

WILD FRONTIER ECOLOGY

Proposed Nursery Development, Triangle Wood,
Herringswell, Suffolk



Supporting Evidence for Appropriate Assessment

November 2021

| Wild Frontier Ecology Ltd | Client details |
|---|--|
| <p>Report produced by: Graham Riley BSc ACIEEM</p> <p>Report checked by: Katrina Salmon BSc</p> <p>Report authorised by: Robert Yaxley BSc (Hons) CECOL CEnv MCIEEM 1st November 2021</p> | <p>Hollins Architects, Surveyors and Planning Consultants</p> <p>4A Market Hill</p> <p>Framlingham</p> <p>Woodbridge</p> <p>IP13 9BA</p> |
| <p>Unit 2 Cold Blow Farm Great Snoring Fakenham Norfolk NR21 0HF Tel: 01328 864 633 graham@wildfrontier-ecology.co.uk</p> | <p>Contact: James Tanner</p> <p>Tel: 01728723959</p> <p>Email: james.t@hollins.co.uk</p> |

© All rights reserved, Wild Frontier Ecology Ltd 2021. No part of this document to be copied or re-used without the permission of the copyright holder.

Company Registered in England and Wales No 4942219. VAT Reg No. 887 4692 54

Registered Office: Saxon House, Hellesdon Park Road, Drayton High Road, Norwich NR6 5DR

Director: Robert Yaxley BSc (Hons) CECOL CEnv MCIEEM.

The data which we have prepared and provided is accurate, and has been prepared and provided in accordance with the CIEEM’s Code of Professional Conduct. We confirm that any opinions expressed are our best and professional bona fide opinions.



This report conforms to the British Standard 42020:2013 Biodiversity - Code of practice for planning and development.

Contents

| | |
|--|----|
| 1. Non-Technical Summary | 4 |
| 2. Background | 5 |
| 3. Objectives | 11 |
| 4. Relevant Legislation and Policy..... | 12 |
| 5. Appraisal Methods..... | 13 |
| 6. International Protected Sites | 14 |
| 7. Characterisation..... | 16 |
| 8. Potential Impacts on International Designated Sites (Adverse Effects on Integrity of the Sites) | 17 |
| 9. Appropriate Assessment | 19 |
| 9. Conclusion | 22 |
| Appendix 1: Appropriate Assessment Process | 23 |

1. Non-Technical Summary

Wild Frontier Ecology Ltd. was commissioned to provide supporting evidence to allow the local authority (West Suffolk District Council) to complete an Appropriate Assessment of a proposed children's nursery development at Triangle Wood, Herringswell, adjacent to Red Lodge, Suffolk. The proposal entails the conversion of an existing building into a day nursery, as well as the provision of a car parking area within areas of amenity lawns, poor semi-improved grassland, mature trees and shrubs.

There are three international designated nature conservation sites within 8km of the proposal site: Breckland SPA, Breckland SAC and a section of Fenland SAC. These sites are publicly accessible to various degrees and are designated for features which could be adversely impacted by increased visitor pressure, most notably breeding stone curlews. The site is within the 1.5km Constraints Zone of the Breckland SPA, and a data search was undertaken with the RSPB who provided records of nesting stone curlew within 2km of the site.

The proposed nursery development will provide supervision for 24 children in year one and reach capacity in year two with 46 children and 12 adult staff. Opening hours will be from 07:30 to 18:00, five days a week for 51 weeks of the year. There will be no permanent residents of the converted nursery building, and consequently it is not expected that there will be an increase in visitors to adjacent areas of the international designated sites as a result of the development.

The RSPB data search returned 15 historical nesting records of stone curlew (none within the last five years) all between 1 and 2km from the proposal and all outside of the SPA boundary. There will be no increase in building footprint as a result of the proposal. The only credible impacts would be from noise disturbance as a result of the nursery development but given the separation distances and existing background noise these are considered to be negligible.

No impacts are expected to arise from the development that would adversely impact the integrity of features of the international sites in isolation, but a cumulative assessment was undertaken identifying further developments within an 8km buffer.

The Local Plans of West Suffolk and East Cambridgeshire Councils provide guidance for new housing developments on the provision of green infrastructure as well as developer contributions to improve and maintain existing infrastructure. The Habitat Regulations Assessments (HRAs) regarding these plans conclude that there will be no likely significant effects, either alone or in combination, on international designated sites as a result of the planned developments.

2. Background

Wild Frontier Ecology Ltd. (WFE) was commissioned by Hollins Architecture Ltd to gather evidence to inform an HRA after the local planning authority (LPA), West Suffolk District Council (WSDC) requested evidence that stone curlews *Burhinus oedicnemus* will not be adversely affected by the proposed conversion of an existing building into a children's nursery. The proposed development is within the 1.5km Constraints Zone around the Breckland SPA and is located at Triangle Wood close to the villages of Herringwell and Red Lodge (centred on National grid reference: TL 7091 6963, Figure 1).

Sharp et al. (2008)¹ states that reductions in density of breeding stone curlew territories may occur where built development is within 1,500m. The nature of this effect is not specified, i.e., a potential correlation is observed, but a causal mechanism is not identified. This study was important in the formation of Breckland Council's policy CP10.

The development comprises the conversion of an existing building to cater for an initial 24 children in year one, rising to 46 in years two-three. The opening hours will be from 07:30 to 18:00, five days a week and will be operational for 51 weeks of the year. Staff numbers will range from eight in year one to 12 in years two and three. A small car parking area and permanent footpath are also within the development plans. There will be no permanent residents of the building once the nursery becomes operational.

The site was visited by WFE (Graham Riley BSc ACIEEM and Katrina Salmon BSc) in September 2021 and was found to comprise of amenity lawns, poor semi-improved grasslands, mature trees, broad-leaved woodland and areas of scrub. A Preliminary Ecological Appraisal report has also been prepared for the site.

¹ Sharp J., Clarke, R.T., Liley D. and Green R.E. (2008) The effect of housing development and roads on the distribution of stone curlews in the Brecks. Report to Breckland District Council.

Figure 1: Proposed Development Location (as shown by red star)

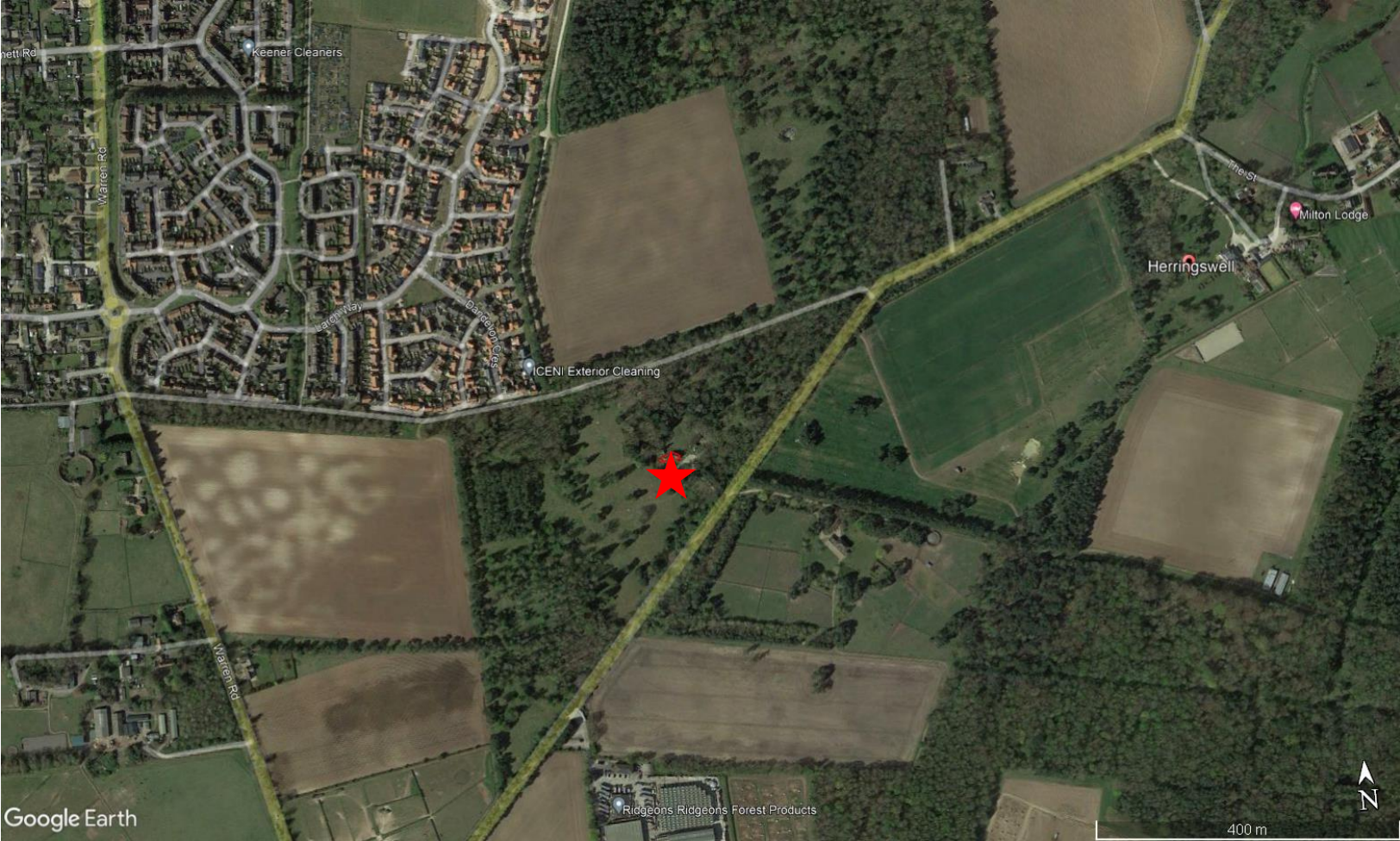


Figure 2: Development Proposal (as supplied by client)



Figure 3: Proposed Development Site Relative to Statutory Designated Sites within 10km

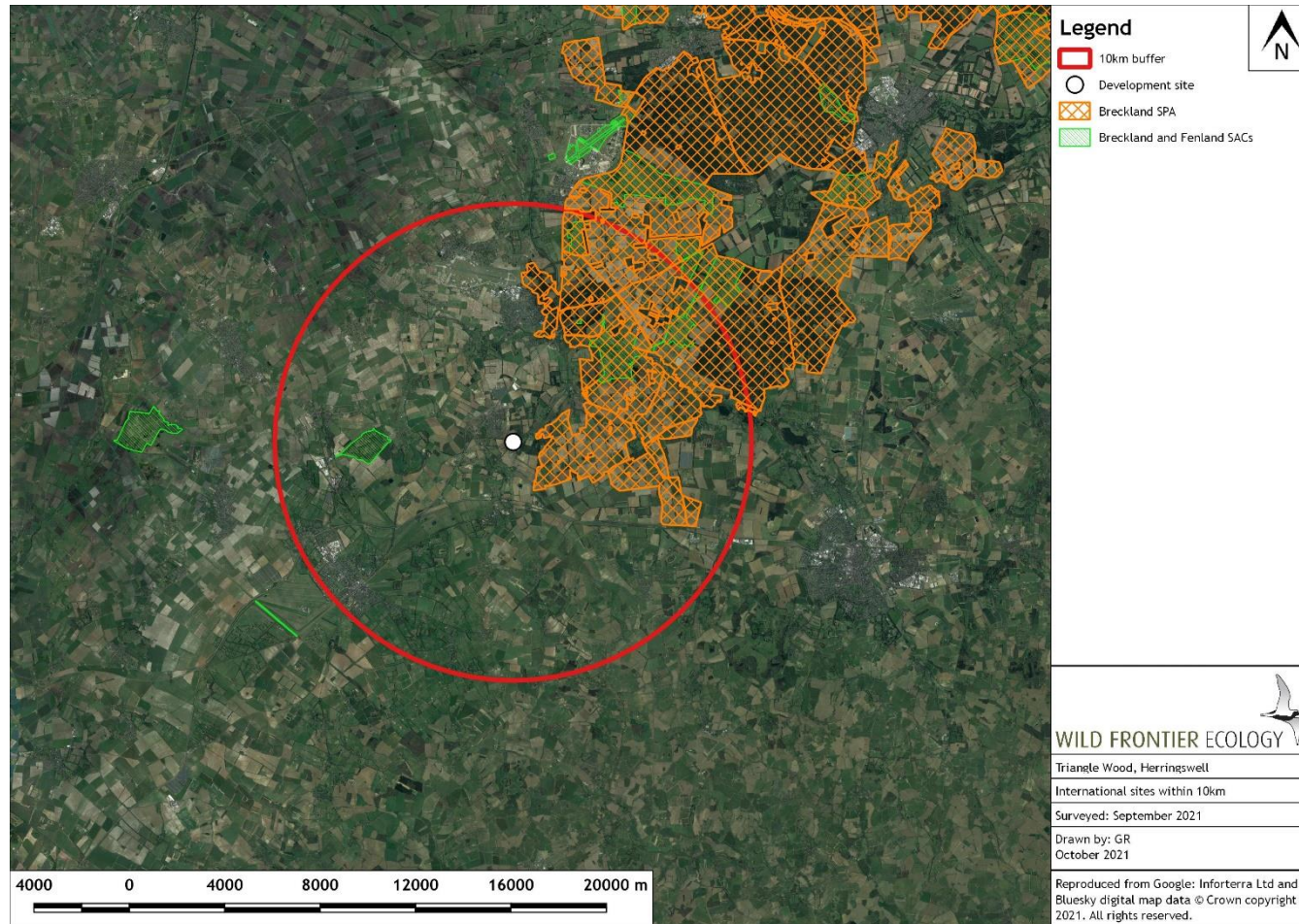


Table 1, below, outlines the Habitats Regulations Assessment process, and defines how this process is being applied to the site under consideration.

Table 1: Habitats Regulations Assessment Process

| Stage | Details | Relevance to Proposed Development at Burnham Norton |
|--|--|---|
| <p>Stage 1: Screening</p> | <p>This stage should seek to identify whether a proposed plan or project is necessary for the management of the international designated site, or likely to have a significant effect on a site, either alone or in combination with other plans or projects. If it is necessary for the management of the designated site, or if no likely significant effect is identified then the project can be ‘screened out’ and no further assessment is necessary.</p> | <p>Project is not necessary for the management of international designated sites.</p> <p>The likelihood of a significant effect on European designated sites as a result of the proposed development cannot be ruled out, as confirmed through an Appropriate Assessment being triggered by WSDC’s planning policies.</p> <p>Therefore, the project must progress to Stage 2.</p> |
| <p>Stage 2: Appropriate assessment</p> | <p>Identification and assessment of potential impacts of the proposed plan or project on the integrity of an international designated site’s structure, function and conservation objectives, either alone or in combination with other plans or projects. Competent authorities can consent to plans or projects that will not adversely affect the integrity of a designated site. Where the integrity of the site is predicted to be adversely impacted, mitigation options need to be considered and the mitigated impacts then re-assessed. If adverse impacts on the designated site’s integrity cannot be avoided despite mitigation measures then consent for the project can only be awarded by following stages 3 and 4.</p> | <p>The Triangle Wood proposal requires Appropriate Assessment by the competent authority (WSDC), with this report representing a compilation of relevant information, assisting them in completing the assessment.</p> |
| <p>Stage 3:* Assessment of alternative solutions</p> | <p>Alternative options for achieving the objectives of the proposed plan or project need to be considered. If there are any feasible alternative solutions then the original plan cannot be consented and the alternative solution will then need to start the appropriate assessment process from stage 1.</p> | <p>Only necessary to consider if, after Appropriate Assessment, the proposal is predicted to have an adverse impact on the integrity of international designated sites.</p> |

| | | |
|--|---|---|
| <p>Stage 4:*</p> <p>Imperative Reasons of Overriding Public Interest and compensatory measures</p> | <p>Where mitigation cannot remove adverse impacts and alternative solutions are not feasible/available, the proposed plan or project can only be consented for Imperative Reasons of Overriding Public Interest (IROPI) and if compensatory measures are secured.</p> | <p>Only necessary to consider if, after stage 3, there are no feasible alternative solutions.</p> |
|--|---|---|

*Stages 3 and 4 are not relevant to this proposal at this stage of the assessment. Further detail on the AA process is given in Appendix 2.

3. Objectives

The main objective of this report is to assist West Suffolk District Council in determining whether the proposed development will have an adverse effect on the integrity of international designated sites, most notably nesting stone curlew associated with Breckland SPA.

There are three international designated sites within 10km of the proposal site in Herringswell, as shown in Figure 3 above; Breckland SPA, Breckland SAC, and a section of Fenland SAC. These sites are considered for potential impacts in this assessment.

4. Relevant Legislation and Policy

4.1 Statutory and Non-statutory Site Designations

4.1.1 International (European) Site Designations

The European Council Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (92/43/EEC) as amended directs the designation of important wildlife sites through the European Community as Special Areas of Conservation, and gives statutory protection to habitats and species listed in the Directive as being threatened or of community interest. Sites identified as candidate SAC (cSAC) are provided with the same level of protection as SAC.

Annex I of 92/43/EEC as amended lists habitat types which are regarded as being of international/European importance. Included within these are a number of 'priority habitat types' which are habitats regarded as being in danger of disappearance and whose natural range falls broadly within the European Union. This European law had been transposed into UK legislation by The Conservation (Natural Habitats) &c Regulations 1994, now replaced by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

Habitats of European-wide importance for birds are listed under the EC Wild Birds Directive (79/409/EEC) as amended. Habitats designated under this Directive are notified as Special Protection Areas and are identified for holding populations > 1% of the reference population as defined in Appendix 4 of the SPA review of bird species listed in Annex 1 of the same Council Directive. Sites identified as potential SPA (pSPA) are provided with the same level of protection as SPA. This has also been transposed into UK legislation by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

Wetlands of International Importance are designated under the Ramsar Convention.

5. Appraisal Methods

5.1 Desk Study

The Multi Agency Geographic Information for the Countryside (MAGIC) website² was reviewed to identify separation distances from the proposed development site to all relevant international designated sites. A 10km radius around the proposed development site was reviewed to identify all such sites. Information on any identified sites was obtained from the websites of the Joint Nature Conservation Committee³ and Natural England⁴.

Relevant studies and information on recreation, visitor habits, travelling distances and other factors was reviewed as part of the appraisal of potential impacts to designated sites from secondary impacts (i.e. visitors, recreation etc.). This information was sourced from WFE's in-house library of studies and research, completed for HRAs of plans and projects across East Anglia.

The RSPB was contacted in September 2021 and asked to provide data for nesting stone curlews they held for the area within 2 kilometres of the proposal site within the last 15 years. This information is sourced from the East of England Stone Curlew Recovery Project (EESCRP), which has been monitoring stone curlew nesting in Breckland SPA since 1985.

5.2 Ecological Site Surveys

The proposed development site was subject to a site visit on 23rd September 2021 by Graham Riley BSc ACIEEM and Katrina Salmon BSc and an Extended Phase 1 Habitat Survey was undertaken of the development footprint.

² www.magic.gov.uk

³ jncc.defra.gov.uk

⁴ www.naturalengland.org.uk

6. International Protected Sites

The international designated sites considered within this HRA are as follows:

Special Protection Areas (SPA)

- Breckland

Special Areas of Conservation (SAC)

- Breckland
- Fenland

Table 2. Site Designations

| Site name | Designation | Reason for designation | Conservation Objectives |
|-----------|------------------------------|---|---|
| Breckland | Special Protection Area | <p>This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:</p> <p>Nightjar <i>Caprimulgus europaeus</i>: 415 pairs representing up to 12.2% of the breeding population in Great Britain (count as at 1998)</p> <p>Stone curlew <i>Burhinus oedicephalus</i>: 142 pairs representing up to 74.7% of the breeding population in Great Britain (count as at 1998)</p> <p>Woodlark <i>Lullula arborea</i>: 430 pairs representing up to 28.7% of the breeding population of Great Britain (count as at 1997)</p> <p>Breckland Forest SSSI is also noted for supporting small numbers (less than 1% of the Great Britain population) of goshawk <i>Accipiter gentilis</i>.</p> <p>Stone curlew is not listed within the Breckland Forest SSSI component of the SPA designation.</p> | <p>Ensure the integrity of the site is maintained... by maintaining or restoring:</p> <p>The extent and distribution of qualifying natural habitats and habitats of qualifying species.</p> <p>The structure and function (including typical species) of qualifying natural habitats.</p> <p>The structure and function of habitats of qualifying species.</p> <p>The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely.</p> <p>The populations of qualifying species.</p> <p>The distribution of qualifying species within the site.</p> |
| Breckland | Special Area of Conservation | <p>Annex I habitats (primary reason for selection):</p> <p>2330: Inland dunes with open <i>Corynephorus</i> and <i>Agrostis</i> grasslands</p> <p>3150: Natural eutrophic lakes with <i>Magnopotamion</i> or <i>Hydrocharition</i>-type vegetation</p> <p>4030: European dry heaths</p> | <p>Ensure the integrity of the site is maintained... by maintaining or restoring:</p> <p>The extent and distribution of qualifying natural habitats and habitats of qualifying species.</p> <p>The structure and function (including typical species)</p> |

| Site name | Designation | Reason for designation | Conservation Objectives |
|-----------|------------------------------|--|--|
| | | <p>6210: Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>)</p> <p>Annex I habitats (present as a qualifying feature but not a primary reason for selection of this site):</p> <p>91E0: Alluvial Forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i></p> <p>Annex II species (present as a qualifying feature but not a primary reason for site selection):</p> <p>1166: Great crested newt <i>Triturus cristatus</i></p> | <p>of qualifying natural habitats.</p> <p>The structure and function of habitats of qualifying species.</p> <p>The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely.</p> <p>The populations of qualifying species.</p> <p>The distribution of qualifying species within the site.</p> |
| Fenland | Special Area of Conservation | <p>Annex I habitats (primary reason for selection):</p> <p>6410: <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden-soils</p> <p>7210: Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i></p> <p>Annex II species (present as a qualifying feature but not a primary reason for site selection):</p> <p>1149: Spined loach <i>Cobitis taenia</i></p> <p>1166: Great crested newt <i>Triturus cristatus</i></p> | <p>Ensure the integrity of the site is maintained... by maintaining or restoring:</p> <p>The extent and distribution of the habitats of the qualifying species.</p> <p>The structure and function of the habitats of the qualifying features.</p> <p>The supporting processes on which the habitats of the qualifying features rely.</p> <p>The population of each of the qualifying features.</p> <p>The distribution of qualifying features within the site.</p> |

The above sites are publicly accessible to varying degrees although the majority of the Breckland Farmland SSSI component of the Breckland SPA, which is the most proximate to the proposal is within private land with no general access. The closest section of the SPA is approximately 1km to the east and has no public access although the Icknield Way Trail forms the western boundary of this area. The closest accessible part of the designation is a stretch of footpath running from the village of Tuddenham to Cavenham approximately 2.5km to the west. Further afield (an approximately 5km drive) is the publicly accessible Cavenham Heath National Nature Reserve, which is also part of Breckland SAC. There are several trails here, and outside of the stone curlew nesting season access is available across the whole site via 'Open Access'.

The most proximate section of Breckland SAC is 4.4km to the north-east and the closest section of Fenland SAC is 5km to the west comprising Chippenham Fen SSSI which has public footpath access.

7. Characterisation

7.1 Characterisation of the project

The proposed layout for the development is detailed in Figure 2.

The site is comprised of two existing buildings, areas of amenity lawns and poor semi-improved grassland along with areas of broad-leaved woodland and scrub. Current plans are for the renovation of the main building to provide day accommodation for an initial 24 children, rising to 46 in years two and three of the project with eight and then 12 staff to supervise. The nursery will be operational for 51 weeks a year from 07:30 until 18:00 and there will be staggered drop off and pick up times. There will be no full-time residents of the building which will remain empty overnight and at weekends.

There are also plans for a car parking area and a footpath connecting the development with the village of Red Lodge approximately 200m to the north-west.

It is expected that the children will remain on-site throughout the day, either indoors or spending periods playing outside if the weather permits.

7.2 Stone Curlew Nesting Data

There were no records provided by the RSPB for nesting stone curlew covering the most recent five-year period, which is partly a reflection of a less intensive survey methodology that has been employed since 2018. Therefore, all records within the last 10 years are recorded in Table 3, below.

Table 3: Records of nesting stone curlews in proximity to the proposal site

| Distance band from proposal site to stone curlew nesting record | Number of stone curlew nesting records in last ten years inside SPA | Number of stone curlew nesting records in last ten years outside SPA |
|---|---|--|
| 0m - 500m | 0 | 0 |
| 500m - 1,000m | 0 | 0 |
| 1,000m - 1,500m | 0 | 6 |
| 1,500m - 2,000m | 0 | 2 |

All records were outside of the SPA and concentrated within a relatively small area around Warrenhill Farm located just over 1km to the south of the proposal.

8. Potential Impacts on International Designated Sites (Adverse Effects on Integrity of the Sites)

8.1 Disturbance during Construction

All construction traffic would access the site from the Herringswell to Kennet Road and would be of a small scale due to the limited scale of the construction works, the majority of which will take place within the main building on site. It is expected that noise associated with the construction will be largely subsumed into the general traffic noise of the neighbouring area. Given the separation distance to the SPA no negative effects from construction are expected.

8.2 Direct Impacts

The site is entirely outside of the SPA and SAC sites considered, so no land take or other direct impacts are anticipated. None of the habitats or species for which the international sites are designated are found on or will regularly occur within the development footprint. It is possible that stone curlews occasionally forage within adjacent fields/horse paddocks but given the proximity of the village of Red Lodge and associated vehicle and human disturbance, this is most likely to occur at night, when the nursery will be unoccupied.

No new buildings will be constructed as a result of the proposal, the development is a 'change of use' of an existing building and will not contribute to a reduction in the density of nesting stone curlews through new built development within 1,500m of the SPA. Once the renovation works are completed, the nursery will be occupied during weekdays by up to 58 people (adults and children). There will be a degree of noise pollution generated by the children when playing outside but given the 1km separation distance to the SPA and the most proximate stone curlew records (outside of the SPA) this will be of a negligible level. There will be a minor increase in traffic associated with the 'pick-ups' and 'drop-offs' of children. However, these will be 'staggered' to avoid congestion periods, and again assessed to be of negligible levels with regard to SPA designated features (nesting stone curlews).

Night lighting will only be of relevance in winter months when stone curlews will not be present within the SPA and surrounding areas, but in any case, the building is effectively screened from view from the SPA by areas of woodland.

8.3 Indirect Proximity Impacts

Non-specific proximity impacts as defined by Sharp et al. 2008 are not applicable in this instance as they only refer to new building, such as the development of 8,000 houses around Thetford, and increased road traffic on the A11. The current development is not a new building and there will be no enlargement of the current building footprint, nor is it adjacent to a trunk road. Additionally, all nesting attempts within 1,500 metres of the development are outside of the SPA boundary.

8.4 Recreational Disturbance

Recreational impacts to the SPA/SAC sites would be defined as those causing disturbance/damage to the notified features of the sites such as breeding stone curlews and scarce habitats. These are most likely to be caused by walking, especially with dogs off the lead, resulting in disturbance of sensitive nesting species by noise and visual disturbance.

Studies indicate that a new housing development is likely to result in the residents walking to any international designated site within 1km and driving to any such site within 8km

for walking or other recreation where facilities such as open access or rights of way exist.^{5,6} However, the nursery development will not lead to an increase in the permanent population of the site, rather a reduction in full-time residents i.e., those likely to use the wider area for recreational purposes. There will be no recreational disturbance of local designated sites (including land used by stone curlews within the 1.5km Constraints Zone) due to the children remaining on site at all times while under the supervision of the care providers. Therefore, the development is assessed as being extremely unlikely to give rise to significant disturbance impacts to features such as breeding stone curlews.

It is necessary to consider whether impacts from neighbouring developments, in combination with impacts from this development, could have any adverse impacts on the integrity of the SPA/SAC. An Appropriate Assessment for in-combination effects is therefore provided below.

⁵ Natural England (2011). Monitor of Engagement with the Natural Environment: The national survey on people and the natural environment: 2010 / 2011 national visitor survey. NE, Peterborough.

⁶ Cruickshanks K, Liley D and Hoskin R (2011) Suffolk Sandlings Living Landscape Project Visitor Survey Report.

9. Appropriate Assessment

9.1.1 Analysis of Potential Effects (Without Mitigation)

The HRA for West Suffolk District Council Site Allocations Local Plan prepared by Land Use Consultants in 2019 considers cumulative impacts from sites with planning permission for residential developments in conjunction with proposed housing site allocations. Sites for which planning permission has been obtained for the construction of five or more dwellings within 8km of the proposal site are detailed in Table 4, below. 8km is the distance within which people have been found to drive to European sites for walking and other recreational activities. The 8km buffer also falls within the jurisdiction of East Cambridgeshire Council and developments are considered from this region as well.

Given the National Statistics stating that the average UK household is occupied by 2.4 people⁷, the below developments will give rise to 959 new dwellings, therefore a possible increase of approximately 2,300 people. The Pet Food Manufacturers Association (PFMA)⁸ estimated that in 2017 20% of households in the East of England owned pet dogs at a density of 1.3 dogs per household and therefore 192 new dog walkers would be anticipated. The proposed development, however, will not contribute to any population increase as it will no longer be a private dwelling with permanent occupants. There will therefore not be any corresponding increase in visitor pressure on international designated sites such as could adversely affect the integrity of the sites i.e., through disturbance of nesting stone curlews.

Table 4: Details of concurrent residential developments with planning permission within 8km of the proposal site

| Planning Reference | Location | Number of Dwellings/ Units |
|--------------------|---|----------------------------|
| DC/20/1969/FUL | St Johns Street Beck Row | 5 |
| DC/16/1758/FUL | Skeltons Drove Beck Row | 10 |
| DC/17/0717/FUL | St Johns Street Beck Row | 12 |
| DC/16/1897/FUL | Laurel Close Holywell Row | 6 |
| DC/17/1107/FUL | Wilde Street Beck Row | 39 |
| DC/18/1206/FUL | Willow Close Holywell Row | 5 |
| DC/18/1244/FUL | St Johns Street Beck Row | 7 |
| DC/19/0976/FUL | Eriswell Road Holywell Row | 5 |
| DC/19/0966/FUL | Eriswell Road Holywell Row | 15 |
| DC/19/1132/FUL | St Johns Street Beck Row | 6 |
| DC/19/2265/FUL | Stock Corner Beck Row | 9 |
| DC/17/2446/FUL | Holiday Cabins Hall Farm Upper Green Higham | 8 |
| DC/16/1922/FUL | Bury Road Kentford CB8 7PR | 5 |
| DC/16/1571/OUT | Land At Manor Farm Road West Row | 5 |
| DC/18/0614/FUL | Beeches Road West Row | 46 |
| DC/19/0505/FUL | Pembroke Close Mildenhall | 6 |

⁷ <http://www.ons.gov.uk/ons/rel/census/2011-census/population-estimates-by-five-year-age-bands--and-household-estimates--for-local-authorities-in-the-united-kingdom/stb-population-and-household-estimates-for-the-united-kingdom-march-2011.html>

⁸ <http://www.pfma.org.uk/pet-population-2016/>

| Planning Reference | Location | Number of Dwellings/ Units |
|--------------------|--|----------------------------|
| DC/19/0508/FUL | Downing Close Mildenhall | 5 |
| DC/19/0507/FUL | Emmanuel Close Mildenhall | 11 |
| DC/19/0506/FUL | Newnham Close Mildenhall | 6 |
| DC/19/1682/FUL | Icklingham Road West Stow IP28 6HE | 5 |
| DC/16/2184/FUL | Fordham Road Newmarket Suffolk | 10 |
| DC/17/0386/FUL | Exning Road Newmarket | 10 |
| DC/17/1614/FUL | Vicarage Road Newmarket | 10 |
| DC/17/1881/FUL | South Drive Exning Road Newmarket | 69 |
| DC/18/1930/FUL | 122 Valley Way Newmarket | 6 |
| DC/18/2477/FUL | Exning Road Newmarket Suffolk | 79 |
| DC/18/2495/FUL | Site Between Windsor Road and Valley Way Newmarket | 13 |
| DC/19/2215/FUL | Valley Way Newmarket | 9 |
| DC/20/1025/FUL | Vicarage Road Newmarket | 15 |
| DC/18/0470/FUL | High Street Tuddenham | 8 |
| DC/16/0300/OUT | Barrow Hill Barrow | 75 |
| 17/01518/FUM | Land To Rear of The Paddocks Cheveley | 10 |
| 18/00989/FUM | The Paddocks Cheveley | 10 |
| 19/00767/OUM | Little Green Cheveley | 22 |
| 19/00331/OUM | Scotland End Chippenham | 10 |
| 17/00221/FUM | Rule Gardens Fordham | 16 |
| 16/01551/OUM | Station Road Fordham | 27 |
| 17/00880/OUM | Market Street Fordham | 150 |
| 16/01662/OUM | Mildenhall Road Fordham | 74 |
| 19/00340/FUL | Mildenhall Road Fordham | 8 |
| 16/00055/OUM | Hall Barn Road Isleham | 14 |
| 17/00510/FUM | Pritty Garden Isleham | 10 |
| 20/00260/OUM | Hall Barn Road Isleham | 17 |
| 16/00690/FUM | Cricket Field Road Newmarket | 6 |
| DC/16/2833/FUL | Warren Road Red Lodge Suffolk | 8 |
| DC/19/2128/FUL | Turnpike Road Red Lodge Suffolk | 25 |

9.1.2 Analysis of Measures to Avoid or Reduce Impacts

In isolation the proposed nursery development is anticipated to have negligible effects on the notified features of proximate international designated sites; Breckland SPA, Breckland SAC and Fenland SAC. However, cumulative recreational impacts could lead to adverse effects on the integrity of the site when residential developments in the borough are considered (without mitigation).

The HRA for West Suffolk Local Plan stipulates that the adopted local policies within its Core Strategy provide a general commitment to provide new or enhanced open space alongside new development and to manage and monitor recreational pressure. Policy CS2 promotes green infrastructure enhancement and/or provision on all new developments. Policy CS13 ensures that there is sufficient capacity in existing local infrastructure for open space, sport and recreation before land is released for development. It also makes provision for developer contributions to improve infrastructure and arrange subsequent maintenance. The provision of Suitable Alternative Natural Greenspace (SANG) is widely accepted as an effective measure for diverting recreational visits away from international

and other designated sites. The policy also promotes the connectivity of existing areas of Greenspace and walking routes.

The East Cambridgeshire Council HRA requires development proposals within and close to the 1.5km stone curlew Constraints Zone (notably in the area of Kennett) to undergo project level HRA through ecological assessment to rule out adverse effects. A precautionary approach is advised.

The proposed development is of a nature and scale such that there are no additional recreation issues beyond those being mitigated for through the above strategies. It is concluded that a result of no adverse effects on the integrity of international designated sites is likely to be achievable, and no residual effects are anticipated.

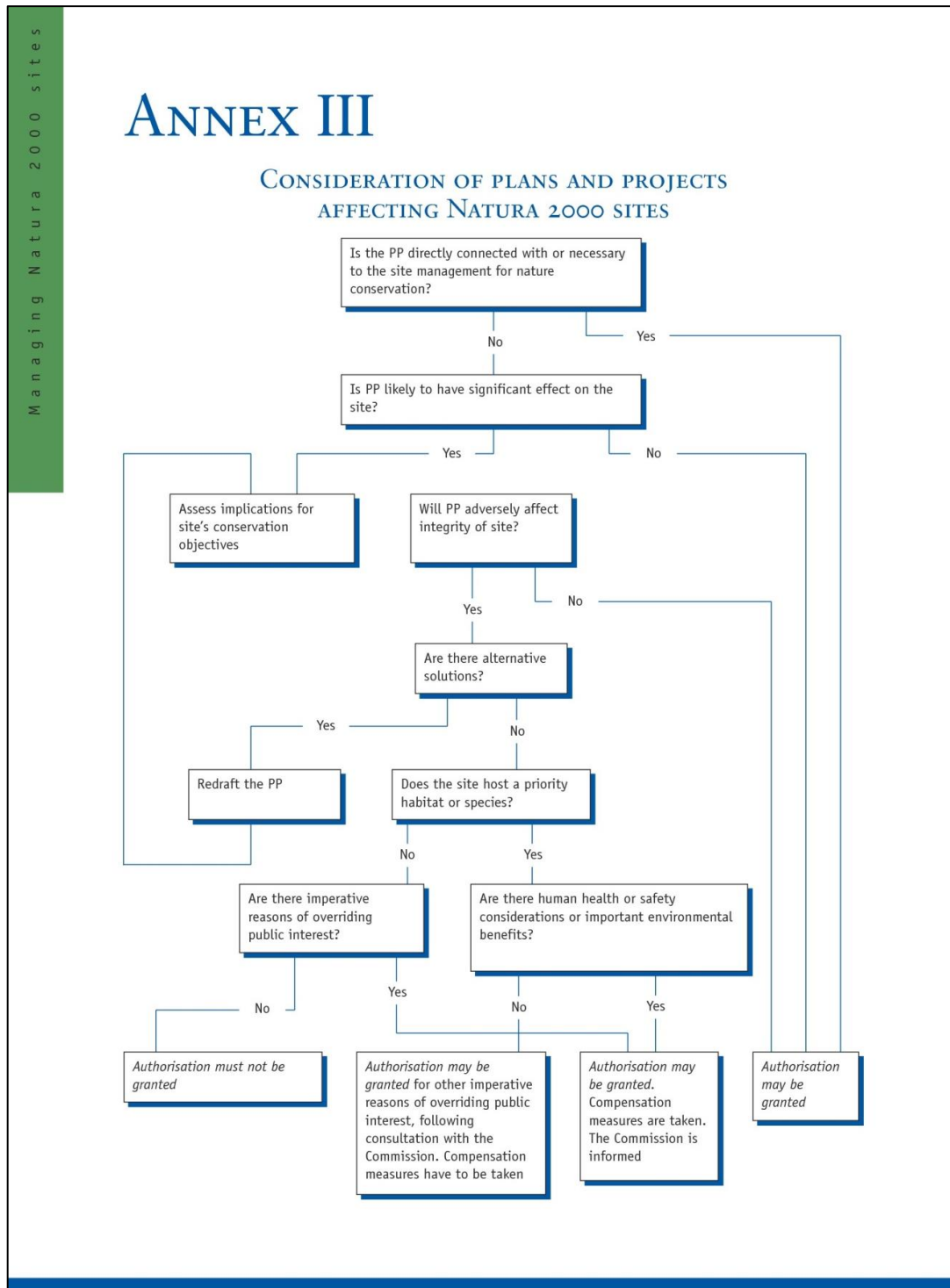
9. Conclusion

The main objectives of this report are to assist WSDC in determining whether the proposed development could have an adverse impact on proximate international designated sites with special regard to nesting stone curlew, whether directly or due to increased recreational use. The sites considered in this report are the following: Breckland SPA, Breckland SAC and Fenland SAC. Given the relatively close proximity of these sites to the development and that some areas are accessible to the public, there is considered to be potential for negative impacts as a result of cumulative recreation pressures from new residential developments within the Borough, including the proposed development. However, given that the development does not represent a new building but a change of use from an existing building, and that there will be no permanent residents associated with the nursery, any potential impacts will be reduced to a negligible level, either alone or in combination.

Appropriate mitigation measures are stipulated in the HRAs for West Suffolk and East Cambridgeshire for new developments and these will sufficiently address potential disturbance issues to the above designated sites.

Appendix 1: Appropriate Assessment Process

The following diagram is taken from “Managing Nature 2000 Sites: The provisions of Article 6 of the ‘Habitats’ Directive 92/43/EEC” (2000)⁹.



⁹ European Commission (2000). *Managing Nature 2000 Sites: The provisions of Article 6 of the ‘Habitats’ Directive 92/43/EEC*. European Commission, Belgium.