

North Norfolk District Council

Habitat Regulations Assessment Screening Report for Consultation

Holt Neighbourhood Plan - Emerging DRAFT Submission Version (March 2022)

May 2022

Final Version for Consultation

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1 Introduction

- 1.1 This report represents a screening of the need for a Habitats Regulations Assessment (HRA) under Directive 92/43/EEC, also known as the Habitats Directive¹ for the emerging updated submission/examination draft of the Holt Neighbourhood Plan dated March 2022. Article 6 (3) of the EU Habitats Directive² and Regulation 63 of the Conservation of Habitats and Species Regulations 2017³ (as amended) requires that an Appropriate Assessment is carried out on any plan or project likely to have a significant effect on a European site.
- 1.2 The purpose of this report is to provide sufficient information in order to consult the required statutory bodies, Environment Agency, Historic England and Natural England and other relevant local interest groups such as water companies and local wildlife trusts, prior to the Local Planning Authority issuing the required screening determination and the finalisation of the submission version of the emerging Holt neighbourhood plan.
- 1.3 The Holt Neighbourhood Plan is being produced by Holt Town Council and is in January 2018. The screening is requested on the updated and emerging submission/examination draft dated March 2022 supplied to the Council. It is recognised that this is not the intended final version for submission but it is assured it contains and will form the substantive content of the revised plan prior to examination. If the emerging Plan is modified in the intervening period further assessment and re screening may be required and the Parish Council is advised to seek further advice from the Council.
- 1.4 European designated sites, in regulation 8 of the Conservation of [Habitats and Species Regulation 2017, as updated](#) consist of those sites classified and proposed (prior to European exit), as Special Areas of Conservation, SAC, Sites of Community Importance and Special Protection Areas, SPA. These are also reflected in the National Planning Policy Framework, NPPF, which also refers to Ramsar sites, which are listed in accordance with the international Ramsar Convention. The NPPF requires decision makers to apply the same protection and process to Ramsar sites as that set out in legislation for European sites⁴.
- 1.5 The Regulations require Habitats Regulations Assessment (HRA) screening to be undertaken by the competent authority i.e. any public body or individual holding public office with a statutory remit and function. In the case of Planning North Norfolk District Council is the competent authority under the EU 'Habitats' Directive 92/43/EEC. The *Habitats Directive* is transposed into UK legislation by the Conservation of Habitats and Species Regulations 2017, as amended (referred to as the *Habitats Regulations*). Under Article 6(3) of the Habitats Directive the Council must consider if the project i.e. the development proposal (Neighbourhood Plan), is likely to have a significant effect on the conservation objectives of the Natura 2000⁵ site or adversely affect the integrity of the Natura 2000 site alone or in combination with other plans or projects. This process is generally referred to as a Habitats Regulations Assessment (HRA).
- 1.6 The HRA process is not defined in legislation but is used to address Articles 6(3) and 6(4) of the Habitats Directive, as transposed by Regulation 63 of the Habitats Regulations. In completing

¹ Directive 92/43/EEC 'on the conservation of natural habitats and of wild fauna and flora': <http://eurlex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31992L0043>

² http://ec.europa.eu/environment/nature/natura2000/management/guidance_en.htm

³ <http://www.legislation.gov.uk/uk/si/2017/1012/contents/made>

⁴ NPPF, 2021 Para 181

⁵ Natura 2000 sites are a network of protected areas covering Europe's most valuable and threatened species and habitats. It is the largest coordinated network of protected areas in the world, extending across all 28 EU countries, both on land and at sea.

this HRA reference has been made to the information contained in the EC guidance document Managing Natura 2000 sites: The provision of Article 6 of the ‘Habitats’ Directive 92/43/EEC (European Communities, 2000), the Habitats Regulations Assessment Handbook by DTA Publications as well as relevant case law, the process is iterative

1.7 Article 6(3) of the EU Habitats Directive states that:

Any plan or project not directly connected with, or necessary to, the management of the [European] site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s conservation objectives. In the light of the conclusions of the assessment of the of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.

1.8 Regulation 105 of the Conservation of Habitats and Species Regulations (2017) as amended states:

Where a land use plan:

- (a) Is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and
- (b) Is not directly connected with or necessary to the management of the site,

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

1.9 It is also a requirement of Regulation 32 schedule 2 of the Neighbourhood Planning Regulations 2012 (as amended).

1.10 A plan or project is subject to an iterative assessment to determine whether it will significantly affect the ecological integrity of any European site, in terms of impacting on the site’s conservation objectives and should conclude whether or not a proposal or policy in the Plan would adversely affect the integrity of any sites.

1.11 To consider whether a proposed development plan or programme is likely to adversely affect the integrity of any European site the HRA is undertaken in stages.

Stage 1: Firstly, plans or programmes must be screened to determine if they are likely to have a significant effect (and are not plans connected to the management of the European site(s) in question). This needs to take account of the likely impacts in combination with other relevant plans and projects. This assessment should be made using the precautionary principle. This means that if there is uncertainty as to whether the plan or programme would cause significant effects on a European site, the full Appropriate Assessment would be required. The screening assessment must reflect the outcomes of the 2018 judgement of the Court of Justice of the European Union⁶, which has ruled

⁶ C-323/17 – People over Wind, Peter Sweetman v Coillte Teoranta

that where mitigation is necessary this must be identified through an Appropriate Assessment.

Stage 2: Carrying out Appropriate Assessment and ascertaining the effect on site integrity. The effects of the plan on the conservation objectives of sites should be assessed, to ascertain whether the plan has an adverse effect on the integrity of a European site.

Stage 3: Identifying mitigation measures and alternative solutions. The aim of this stage is to find ways of avoiding or significantly reducing adverse impacts, so that site integrity is no longer at risk. If there are still likely to be negative impacts, the option should be dropped, unless exceptionally it can be justified by imperative reasons of overriding public interest.

- 1.12 If it cannot be demonstrated at the screening stage that the plan or programme will not have significant effects of the European site(s), an 'Appropriate Assessment' (AA) must then be undertaken. This is a much more detailed study of the effects of the plan or programme and mitigation measures. The parts together form a full HRA. Where it is deemed that adverse effects cannot be ruled out, a plan or project must not proceed, unless exception tests are met.
- 1.13 If an Appropriate Assessment is required, then this will engage the need for a Strategic Environmental Assessment, SEA.
- 1.14 The Neighbourhood Planning (General) Regulations 2012⁷, state that submitted neighbourhood plans need to be accompanied by a statement explaining how the proposed neighbourhood plan meets the "basic conditions" set out in Schedule 4B of the 1990 Town and Country Planning Act. These basic conditions include a requirement to demonstrate how the plan is compatible with EU obligations, which includes the need to undertake a HRA. This is one of the matters that will be tested as part of the independent examination of the Plan. In doing so the competent authority i.e NNDC will issue a Screening Determination as part of the HRA regulations setting out the Councils' HRA determination conclusions. Such a document follows the initial screening and or more detailed Appropriate Assessment following consultation with relevant statutory consultees and can be relied upon by the submitting authority i.e the Parish Council, as part of submission documents and for the subsequent examination.
- 1.15 Neighbourhood planning bodies are advised through national guidance to consider the environmental implications of its proposals in the production of a neighbourhood plan. Screening though can only be undertaken when sufficient information is available to enable the competent authority to determine whether the emerging Plan requires further detailed assessments in relation to the Habitats Regulations 2017 as updated. Undertaken too early a further screening exercise is likely to be necessary at subsequent stages when the direction and content of the plan is known. Undertaken during the later stages in the production of the neighbourhood plan however may have implications for delay as sufficient time needs to be factored into the production of a neighbourhood plan for any procedural steps required under the legislation. Plans should be kept under review and screened again should the content and particularly the scope change. A screening determination issued by the Council is required at submission.

⁷ http://www.legislation.gov.uk/ukxi/2012/637/pdfs/ukxi_20120637_en.pdf

1.16 The Holt Neighbourhood Plan is being produced by Holt Town Council and will need to be in general conformity with the strategic policies of the Local Plan. The adopted Local Plan is currently the North Norfolk Core Strategy 2008 and the Site Allocations Development Plan Document, 2011. The District Council has also a replacement single local plan emerging which is in an advance stage. Para 48 of the NPPF

Local planning authorities may give weight to relevant policies in emerging plans according to:

- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)

1.17 The emerging Local Plan has reached pre submission stage and was consulted on under Regulation 19 in January and February 2022. The Holt Neighbourhood Plan is being developed within the wider context of the adopted and emerging Local Plan.

1.18 The Local Plan was subject to Habitats Regulations Assessment as part of its production. Where screening identified a likely significant effect, an Appropriate Assessment was undertaken and mitigation measures identified were incorporated within the Local Plan, resulting in a conclusion that the local plan will not lead to any adverse effects on European sites. Likely significant effects were identified in relation to a number of site allocations and strategic policies in relation to urban effects, recreation (including dog walking) and Hydrological Impacts Adverse effects were subsequently ruled out through suitable policy wording and measures. In relation to recreational impacts the Council has undertaken and implemented a strategic Green Infrastructure Recreational Avoidance and Mitigation Strategy and requires payment towards strategic mitigation from residential developments throughout the district in relation to qualifying development.

1.19 This screening report contains the results of Stage 1 (above) in relation to the Hold Neighbourhood Plan. Stages 2 and 3 are only required if the screening stage concludes that there is likely to be a significant impact on a European site. The initial screening has been undertaken by North Norfolk District Council and is subject to consultation with Natural England as a statutory consultee.

2 Protected sites covered by this screening report

2.1 In assessing the implications of any plan or project, in this case the neighbourhood plan, for European sites in close proximity, it is essential to fully understand the sites in question, their interest features, current condition, sensitivities and any other ongoing matters that are influencing each of the sites. This section seeks to answer the following questions:

- What are the Natura 2000 site/s affected by the development and why has it been designated?
- Are there any nationally designated sites (SSSI) or Ramsar sites that may be affected by the development?
- What are the qualifying features of the Natura 2000 Site/s and/or the special interest features of any associated SSSI/Ramsar;
- What are the Conservation Objectives for the Natura 2000 Site/s

2.2 The Holt Neighbourhood Plan Area (NPA) contains the following designated European sites and nature conservation sites:

- Norfolk Valley Fens

2.3 Sites included in this assessment are listed in Table 1 below. This includes all sites that are within 20km of the Holt Neighbourhood Plan area (for consistency with the distances applied within the HRA of the Local Plan and adopting the precautionary approach). The locations of the sites are shown on maps in Appendix 1 and the Qualifying Features and Conservation Objectives of the sites are contained below in Table 2.

Table 1: Relevant European sites

Designation	Name
SAC	North Norfolk Coast
	The Wash & North Norfolk Coast
	Norfolk Valley Fens
	River Wensum
	Overstrand Cliffs
SPA	North Norfolk Coast
	Greater Wash
SAC (Marine)	North Norfolk Coast
	The Wash and North Norfolk Coast
SPA (Marine)	North Norfolk Coast
	Greater Wash
Ramsar Sites	North Norfolk Coast

Designation	Name
SSSI	Bryant's Heath, Felmingham
	Cockthorpe Common, Stiffkey
	East Runton Cliffs
	Edgefield Little Wood
	Felbrigg Woods
	Glandford (Hurdle Lane)

	Glandford (Letheringsett Road)
	Gunton Park Lake
	Holt Lowes
	Kelling Heath
	Morston Cliff
	North Norfolk Coast
	River Wensum
	Sheringham and Beeston Regis Commons
	Sidestrand and Trimingham Cliffs
	Southrepps Common
	Stiffkey Valley
	Swanton Novers Woods
	Warham Camp
	Wells Chalk Pit
	West Runton Cliffs
	Westwick Lakes
	Weybourne Cliffs
	Weybourne Town Pit
	Wiveton Downs

Table 2 European sites including Ramsar that may be effected by the emerging neighbourhood Plan

Name & Uk Ref No	Description	Ref	Feature Description
North Norfolk Coast SAC - UK0019838 This forms part of the North Norfolk Coast Marine Site	Designated primarily for its coastal habitats including: coastal lagoons, perennial vegetation of stony banks (at Blakeney Point), Mediterranean and thermo-Atlantic halophilous scrub, embryonic shifting dunes, white dunes, fixed grey dunes and humid dune slacks. Species of importance which are present as a qualifying feature on the site, but not a primary reason for selection, include otter and pearlwort.	1150	Coastal lagoons
		1220	Perennial vegetation of stony banks
		1420	Mediterranean and thermo-Atlantic halophilous scrubs (<i>Sarcocornetea fruticosi</i>)
			Embryonic shifting dunes
		2110	Shifting dunes along the shoreline with
		2120	<i>Ammophila arenaria</i> ("white dunes")
			Fixed coastal dunes with herbaceous vegetation ("grey dunes")
		2130	Humid dune slacks
		2190	Otter, <i>Lutra lutra</i>
		1355	Petalwort, <i>Petalophyllum ralfsii</i>
1395			
			Publication date 27 Nov 2018 version 3
The Wash and North Norfolk Coast SAC - UK0017075 This site is a part of The Wash and North Norfolk Coast European Marine Site	An important marine area, covering the intertidal and subtidal areas only, which are also included in the component SPAs/SACs. It forms the largest marine embayment in the UK, consisting of extensive areas of sand and mud flats fringed by saltmarsh, supporting rich invertebrate communities and internationally important overwintering birds. It provides the only classic British example of a barrier beach system.	1110	Subtidal Sandbanks which are slightly covered by sea water all the time
		1140	Mudflats and sandflats not covered by seawater at low tide
			Intertidal mudflats and sandflats
		1150	Coastal lagoons
		1160	Large shallow inlets and bays
		1170	Reefs
		1310	<i>Salicornia</i> and other annuals colonizing mud and sand. Glasswort and other annuals colonising mud and sand
		1330	Atlantic salt meadows (<i>Glaucopuccinellietalia maritimae</i>)
1420	Mediterranean and thermo-Atlantic halophilous scrubs (<i>Sarcocornetea fruticosi</i>). Mediterranean saltmarsh scrub.		
	Otter, <i>Lutra lutra</i>		
1355	Common seal <i>Phoca Vitulina</i>		

Name & Uk Ref No	Description	Ref	Feature Description
		1365	Publication date: 27 Nov 2018 (version 3)
Norfolk Valley Fens SAC UK0012892	A series of rare spring fed fens. The individual fens vary in their structure according to intensity of management and provide a wide range of variation. Such spring-fed flush fens are very rare in the lowlands. The spring-heads are dominated by the small sedge fen type, mainly referable to black-bog-rush – blunt-flowered rush (<i>Schoenus nigricans</i> – <i>Juncus subnodulosus</i>) mire, but there are transitions to reedswamp and other fen and wet grassland types. The individual fens vary in their structure according to intensity of management and provide a wide range of variation. There is a rich flora associated with these fens, including species such as grass-of-Parnassus <i>Parnassia palustris</i> , common butterwort <i>Pinguicula vulgaris</i> , marsh helleborine <i>Epipactis palustris</i> and narrow-leaved marsh-orchid <i>Dactylorhiza traunsteineri</i> .	H4010 H4030 H6210 H6410 H7210 H7230 H91E0 S1014 S1016	Northern Atlantic wet heaths with <i>Erica tetralix</i> ; Wet heathland with cross-leaved heath. European dry heaths. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>FestucoBrometalia</i>); Dry grasslands and scrublands on chalk or limestone. <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinia caerulea</i>); Purple moor-grass meadows Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> ; Calcium-rich fen dominated by great fen sedge (saw sedge) Alkaline fens; Calcium-rich springwater-fed fens Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i>); Alder woodland on floodplains <i>Vertigo angustior</i> ; Narrow-mouthed whorl snail <i>Vertigo moulinsiana</i> ; Desmoulin`s whorl snail. Publication date: 27 Nov 2018 (version 3) Denotes Features in relation to Holt Lows SSSI
River Wensum SAC UK0012647	The River Wensum is a naturally enriched, calcareous lowland river originating in north-west Norfolk, flowing south-east to Norwich where it joins the River Yare. The upper reaches are fed by springs that rise from the chalk and by run-off from calcareous soils rich in plant nutrients. This gives rise to beds of submerged and emergent vegetation characteristic of a chalk stream. It flows over chalk that has been overlain by a complex sequence of glacial drift, sands and gravels. Intensive arable land-use dominates the landscape on the higher plateaus and valley sides, and grazing marsh, fen, reedbed, scrub and scattered woodland characterise the floodplain. Unusually for a lowland river, much of the floodplain of the River Wensum is still traditionally managed and relatively natural. Water	H3260 S1016 S1092 S1096 S1163	Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitriche/Batrachion</i> vegetation; Rivers with floating vegetation often dominated by water-crowfoot. <i>Vertigo moulinsiana</i> ; Desmoulin`s whorl snail <i>Austropotamobius pallipes</i> ; White-clawed (or Atlantic stream) crayfish <i>Lampetra planeri</i> ; Brook lamprey <i>Cottus gobio</i> ; Bullhead

Name & Uk Ref No	Description	Ref	Feature Description
	<p>sediments, with occasional areas of sand, mud and mixed sediments. Subtidal sandbanks occur at the mouth of the Humber Estuary, primarily comprising sand and coarse sediments. Offshore, soft sediments dominate, with extensive areas of subtidal sandbanks off The Wash as well as north and east Norfolk coasts. Closer inshore at The Wash and north Norfolk coast, sediments comprise a mosaic of sand, muddy sand, mixed sediments and coarse sediments, as well as occasional Annex I reefs. The area off the Suffolk coast continues the mosaic habitats mostly dominated by soft sediment.</p>	<p>A193 A195</p>	<p>Sterna hirundo; Common tern (Breeding) Sternula albifrons; Little tern (Breeding)</p> <p>Publication date: 21 Feb 2019 (version 3).</p>

	Description	Feature
North Norfolk Coast Ramsar Site	The low-lying barrier coastline of North Norfolk is designated as a Ramsar site for its diverse and extensive wetland habitats and associated species (notably waterfowl). The Ramsar site effectively covers the same area as the SPA and encompasses a variety of habitats including intertidal sands and muds, saltmarshes, shingle and sand dunes, together with areas of reclaimed freshwater grazing marsh and reed bed, which is developed in front of rising land. Both freshwater and marine habitats support internationally important numbers of wildfowl in winter and several nationally rare breeding birds. The sandflats, sand dune, saltmarsh, shingle and saline lagoons habitats are of international importance for their fauna, flora and geomorphology.	<p>The site has been selected under the following Ramsar criteria:</p> <p>1a - Good representative example of a (near) natural wetland, characteristic of the biogeographic region.</p> <p>2a - Supports an assemblage of rare, vulnerable or endangered species or subspecies.</p> <p>3a - Regularly supports at least 20,000 waterfowl. 3c - Regularly supports at least 1% of all the individuals in a waterfowl population.</p>
	Ramsar Criterion 1a	The site is one of the largest expanses of undeveloped coastal habitat of its type in Europe. It is a particularly good example of a marshland coast with intertidal sand and mud, saltmarshes, shingle banks and sand dunes. There are a series of brackish water lagoons and extensive areas of freshwater grazing marsh and reed beds
	Ramsar criterion 2a	Supports at least three British Red Data Book and nine nationally scarce vascular plants, one British Red Data Book lichen and 38 British Red Data Book invertebrates.
	Ramsar Criterion 3a	Over the winter the site regularly supports over 20,000 waterfowl. Assemblages of international importance with peak counts in winter: 98,462 counts of waterfowl (5 year peak mean (1998/99 to 2002/03)
	Ramsar criterion 3c	<p><i>Populations of breeding,:</i></p> <p><i>Little tern, Sternula albifrons</i></p> <p><i>Common tern, Sterna hirundo</i></p> <p><i>Sandwich tern, Sterna sandvicensis</i></p> <p><i>During the winter the site supports passage and winter bird species of international importance, including</i></p> <p><i>Knot, Calidris canutus</i></p> <p><i>Dark-bellied brent goose Branta bernicla bernicla</i></p> <p><i>Wigeon, Anas penelope</i></p> <p><i>Pink-footed goose Anser brachyrhynchus</i></p>

	Description	Feature	
		Source North Norfolk Coast Coastal Habitat Management Plan Jan 2003. Natural England Access to Evidence	
	SSSI Units	Special Interest Feature	Condition Status
North Norfolk Coast SSSI	Multiple Units (70 live units in total)	Various	Ranging from Unfavourable – recovering to Favourable. 98% in favourable condition

Source: European sites in the East of England <http://publications.naturalengland.org.uk/category/6581547796791296>

Accessed 15.5.22

Conservation Objectives

- 2.4 The conservation objectives are those referred to in the Conservation of Habitats and Species Regulations 2017. In accordance with advice from Natural England they provide a framework which should inform any Habitats Regulation Assessment that the competent authority may be required to make under the legislation. A sites conservation objectives apply to the site and the individual species and/or assemblage of species for which the site has been classified (the “Qualifying features”). The objectives are to ensure that subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the Favourable Conservation Status of its qualifying features by maintaining or restoring.
- 2.5 Conservation Objectives for the **North Norfolk Coast SAC**⁸ and the **Wash and North Norfolk Coast SAC**⁹ (Natural England, published, 27th November 2018, version 3).
- Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;
 - The extent and distribution of qualifying natural habitats and habitats of qualifying species
 - The structure and function (including typical species) of qualifying natural habitats
 - The structure and function of the habitats of qualifying species
 - The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
 - The populations of qualifying species, and,
 - The distribution of qualifying species within the site.
- 2.6 Conservation Objectives for **the Norfolk Valley Fens SAC**¹⁰ (Natural England, published 27th November 2018, version 3).
- Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;
 - The extent and distribution of qualifying natural habitats and habitats of qualifying species

⁸[European Site Conservation Objectives for North Norfolk Coast SAC - UK0019838 \(naturalengland.org.uk\)](#)

⁹[European Site Conservation Objectives for The Wash & North Norfolk Coast SAC - UK0017075 \(naturalengland.org.uk\)](#)

¹⁰[European Site Conservation Objectives for Norfolk Valley Fens SAC - UK0012892 \(naturalengland.org.uk\)](#)

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

This document should be read in conjunction with the accompanying Supplementary Advice document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

2.7 Conservation Objectives for the **River Wensum SAC**¹¹ (Natural England, published 27th November 2018, version 3).

- Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;
 - The extent and distribution of qualifying natural habitats and habitats of qualifying species
 - The structure and function (including typical species) of qualifying natural habitats
 - The structure and function of the habitats of qualifying species
 - The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
 - The populations of qualifying species, and,
 - The distribution of qualifying species within the site

This document should be read in conjunction with the accompanying Supplementary Advice document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above

2.8 Conservation Objectives for the **Overstrand Cliffs SAC**¹² (Natural England, published 27th November 2018, version 3).

- Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;
 - The extent and distribution of the qualifying natural habitat
 - The structure and function (including typical species) of the qualifying natural habitats, and
 - The supporting processes on which the qualifying natural habitats rely

This document should be read in conjunction with the accompanying Supplementary Advice document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

¹¹ [European Site Conservation Objectives for River Wensum SAC - UK0012647 \(naturalengland.org.uk\)](https://naturalengland.org.uk/european-site-conservation-objectives-for-river-wensum-sac-uk0012647)

¹² [European Site Conservation Objectives for Overstrand Cliffs SAC - UK0030232 \(naturalengland.org.uk\)](https://naturalengland.org.uk/european-site-conservation-objectives-for-overstrand-cliffs-sac-uk0030232)

2.9 Conservation Objectives for the **North Norfolk Coast SPA**¹³ (Natural England, published 27th November 2018, version3.

- The objectives are to ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:
 - The extent and distribution of the habitats of the qualifying features
 - The structure and function of the habitats of the qualifying features
 - The supporting processes on which the habitats of the qualifying features rely
 - The populations of the qualifying features
 - The distribution of the qualifying features within the site.

2.10 Conservation Objectives for the **Greater Wash SPA**¹⁴ (Natural England, published 21st February 2019, version3.

- Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;
 - The extent and distribution of the habitats of the qualifying features
 - The structure and function of the habitats of the qualifying features
 - The supporting processes on which the habitats of the qualifying features rely
 - The population of each of the qualifying features, and,
 - The distribution of the qualifying features within the site.

Supplementary Advice

2.11 Natural England has produced Supplementary Advice to the conservation objectives for the Norfolk Valley Fens, River Wensum and Overstrand Cliffs which provides further details when developing, proposing or assessing an activity, plan or project that may affect this site. Any proposals or operations which may affect the site or its qualifying features should be designed so they do not adversely affect any of the attributes listed in the objectives and supplementary advice. The Supplementary Advice to the Conservation Objectives presents attributes which are ecological characteristics of the designated species and habitats within a site. The listed attributes are considered to be those that best describe the site's ecological integrity and which, if safeguarded, will enable achievement of the Conservation Objectives. Each attribute has a target which is either quantified or qualitative depending on the available evidence. The target identifies as far as possible the desired state to be achieved for the attribute.

2.12 The supplementary advice to the Conservation objectives of **Holt Lowes**¹⁵ (Norfolk Valley Fens), uploaded 12.3.2019 accessed 20.5.22, presents attributes which are considered to be those that best describe the site's ecological integrity and which, if safeguarded, will enable achievement of the Conservation Objectives. The detailed targets are contained in the advice note published by Natural England which can be found with the conservation Objectives. [European Site Conservation Objectives for Norfolk Valley Fens SAC - UK0012892 \(naturalengland.org.uk\)](http://publications.naturalengland.org.uk/file/5508865827536896). In many cases, the attribute targets shown in the tables indicate the need to maintain the attributes such as the vegetation structure and composition vegetation. Four features in particular are references in relation to Holt Lowes:

¹³ [European Site Conservation Objectives for North Norfolk Coast SPA - UK9009031 \(naturalengland.org.uk\)](http://publications.naturalengland.org.uk/file/5508865827536896)

¹⁴ [European Site Conservation Objectives for Greater Wash SPA - UK9020329 \(naturalengland.org.uk\)](http://publications.naturalengland.org.uk/file/5508865827536896)

¹⁵ <http://publications.naturalengland.org.uk/file/5508865827536896>

- H4010, Northern Atlantic wet heaths: Maintain the distribution and configuration of the feature, including where applicable its component vegetation types, across the site
- H4030, European dry heaths: Maintain the distribution and configuration of the feature, including where applicable its component vegetation types, across the site.
 - Open character is to be maintained. Isolated trees are important but overall cover of scrub and trees across this habitat feature should be maintained or restored to a fairly sparse level, with a structurally complex edge and with characteristic heathland vegetation as ground cover. Within heathland mosaics, there should be no more than 5% scrub on both sites, and no more than rare if scattered. However, there is a balance that needs to be struck as scrub adds diversity to the physical structure of the site and is therefore important in relation to invertebrate assemblages. However, while there open conditions and bare ground remain, the site will be particularly vulnerable to regeneration (particularly of birch), and it will be necessary to ensure that this is controlled, particularly during the period up until the heather canopy closes.
 - Rhododendron is present at Holt Lowes and should be controlled.
- H4030, European dry heaths: Maintain the properties of the underlying soil types, including structure, bulk density, total carbon, pH, soil nutrient status and fungal: bacterial ratio, to within typical values for the habitat.
 - Peat soils within the Norfolk Valley Fens SAC are considered vulnerable to trampling, These habitats are sensitive to visitor pressure and increased visitor numbers may be detrimental to the peat substrates.
- H6410. Molinia meadows on calcareous, peaty or clayey-silt-laden soils (*Molinia caeruleae*); Purple moor-grass meadows: Restore the distribution and configuration of the feature, including where applicable its component vegetation types, across the site
- H7230. Alkaline fens; Calcium-rich springwater-fed fens: Ensure the component vegetation communities of the feature are referable to and characterised by the following National Vegetation Classification types. Maintaining or restoring these characteristic and distinctive vegetation types, and the range of types as appropriate, will be important to sustaining the overall habitat feature.
 - M13 *Schoenus nigricans* – *Juncus subnodulosus* mire.
 - Maintain and Restore the low nutrient status of irrigating water, ensuring it is rich in base ions, particularly calcium.

2.13 The supplementary advice to the Conservation objectives of the **River Wensum**¹⁶ uploaded 3.3.2019 accessed 20.5.22, presents attributes which are ecological characteristics of the designated species and habitats within a site. The listed attributes are considered to be those that best describe the site's ecological integrity and which, if safeguarded, will enable achievement of the Conservation Objectives. Each attribute has a target which is either quantified or qualitative depending on the available evidence. The target identifies as far as possible the desired state to be achieved for the attribute. The detailed targets are contained in the advice note published by Natural England which can be found with the conservation Objectives. [European Site Conservation Objectives for River Wensum SAC - UK0012647 \(naturalengland.org.uk\)](http://publications.naturalengland.org.uk/file/6254570196172800). In many cases, the attribute targets shown in the tables indicate the need to 'restore' the attribute while others seek to "maintain" levels. This is based on the best available information, including that gathered during monitoring of the feature's current

¹⁶ <http://publications.naturalengland.org.uk/file/6254570196172800>

condition. As new information on feature condition becomes available, this will be added so that the advice remains up to date.

- 2.14 The supplementary advice to the Conservation objectives of **Overstrand Cliffs**, uploaded 27.11.2018 accessed 20.5.22. The detailed targets are contained in the advice note published by Natural England which can be found with the conservation Objectives. [European Site Conservation Objectives for Overstrand Cliffs SAC - UK0030232 \(naturalengland.org.uk\)](https://www.naturalengland.org.uk/conservation-objectives-for-overstrand-cliffs-sac-uk0030232).¹⁷ In many cases, the attribute targets shown in the tables indicate the need to maintain the attributes such as the range of vegetation, natural processes including that of the natural coastal process necessary to maintain cycles of cliff erosion.
- 2.15 The **North Norfolk Coast SPA**, which forms part of their Conservation Advice Package, and includes the use of Supplementary Advice Tables (SATs). The SATs present attributes which are ecological characteristics of the designated species and habitats within a site. The listed attributes are considered to be those which best describe the site's ecological integrity and which if safeguarded will enable achievement of the Conservation Objectives.
- 2.16 For breeding common tern, little tern and sandwich tern one of the features or attributes identified for action is 'supporting habitat: disturbance caused by human activity'. The target for this attribute is 'the frequency, duration and/or intensity of disturbance affecting nesting and/or feeding birds should not reach levels that substantially affects the feature'. The supplementary advice recognises that the nature, scale, timing and duration of some human activities can result in the disturbance of birds at a level that may substantially affect their behaviour, and consequently affect the long-term viability of the population. Disturbance associated with human activity may take a variety of forms including noise, light, sound, vibration, trampling, and presence of people, animals and structures.
- 2.17 In addition to the Supplementary Advice provided by Natural England for the SPA, as the North Norfolk Coast is part of the European Marine Site (EMS), the Conservation Objectives should be used in conjunction with the Regulation 35 Conservation Advice Package (also provided by Natural England). The Regulation 35 package provides advice and guidance on the operations that are likely to damage the interest features of the site.
- 2.18 The Regulation 35 Advice indicates that the Conservation Objectives for the EMS at a site level focus on maintaining the condition of the habitats used by the qualifying species. Habitat condition is to be delivered through appropriate site management including the avoidance of damaging disturbance, such as the effects of trampling or species collection.
- 2.19 In the Favourable Conservation Status table for the North Norfolk Coast SPA, disturbance is listed as an attribute for Annex 1 breeding birds. The attribute is 'predation and disturbance in nesting areas', with the target to achieve no significant reduction in breeding success attributable to human disturbance or predation. Furthermore, 'disturbance in feeding and roosting areas' is also listed as an attribute for the *internationally important assemblage of non-breeding waterfowl including regularly occurring migratory species*, a Qualifying Feature of the SPA. The target here is for no significant reduction in numbers of or displacement of birds attributable to human disturbance from an established baseline, subject to natural change.

¹⁷ <http://publications.naturalengland.org.uk/file/5574891690524672>

- 2.20 Furthermore, a site improvement plan (SIP), published 19th December 2014, has been produced for the Wash and North Norfolk Coast Natura 2000 sites incorporating the SAC and SPA designations. It raises fifteen prioritised issues to be addressed, of which the issue of ‘public recreation and disturbance’ is of relevance. To address the *public recreation and disturbance* issue, five actions have been produced. The mechanisms to implement these actions include investigation, research and monitoring; education and awareness raising; and an access strategy.
- 2.21 **Natural England has also produced Marine Conservation Advice Packages** for The North Norfolk Coast Marine, Special Protection Area **and** The Greater Wash Marine Special Protection Area which includes supplementary advice for the marine features. Natural England is in the process of developing Conservation Advice for the terrestrial features, which may need to be taken into account in the future with any updates to this document.
- 2.22 The Supplementary Advice for these marine sites includes the use of Supplementary Advice Tables (SATs). The SATs present attributes which are ecological characteristics of the designated species and habitats within a site. The listed attributes are considered to be those which best describe the site’s ecological integrity and which if safeguarded will enable achievement of the Conservation Objectives. Each attribute has a target which is either quantified or qualitative depending on the available evidence. The target identifies as far as possible the desired state to be achieved for the attribute.
- 2.23 Further Background information and Geology of the Marine Sites is included as an appendix 2 this this report.

3 Holt Neighbourhood Plan

- 3.1 Holt Town Council is producing a Neighbourhood Plan for Holt, in order to set out the vision, objectives and policies for the development of the parish, within the context of the Local Plan and emerging updated Local Plan. This Habitats Regulations Assessment screening assessment reviews the emerging Draft submission Plan following the previous regulation 14 pre submission consultation under taken in January / February 2018. The emerging Draft is significantly reworked to reflect feedback and further advice.
- 3.2 The Neighbourhood Plan includes a range of policies covering the Holt Neighbourhood Plan area as mapped in appendix 3. A number of policies relate to the full Neighbourhood Plan area whilst others are area/location specific. The Neighbourhood Plan does not allocate specific sites for development.
- 3.3 The policies in the Holt Neighbourhood Plan are listed in Table 2 below. An assessment of whether each policy is likely to have a significant effect on European protected sites is included in section 5 of this report

Table 2: List of Neighbourhood Plan Policies

Holt 1	Design Guidance
Holt 2	Housing Mix & Tenure
Holt 3	Green Infrastructure
Holt 4	Employment Growth in Holt
Holt 5	Community Facilities
Holt 6	Connectivity in and around Holt
Holt 7	Open Spaces

4 Other Plans & Projects: In-Combination Effects

- 4.1 Regulation 105 of the 2017 Regulations requires consideration to be given to whether a Plan will have an effect either alone or in - combination with other plans or projects.
- 4.2 The effects of the plan in-combination with other plans or projects are the cumulative effects which will or might arise from the addition of the effects of other relevant plans or projects alongside the plan under consideration. If during the stage 1 screening it is found the subject plan would have no likely effect alone, but might have such an effect in-combination then the appropriate assessment at stage 2 will need to proceed to consider cumulative effects. Where a plan is screened as having a likely significant effect alone, then the subsequent appropriate assessment should initially concentrate on its effects alone.
- 4.2 The emerging Holt Neighbourhood Plan will be subject to examination and referendum. If successful it will sit alongside the Local Plan and form part of the wider Development Plan in as far as material considerations are concerned in the Holt Neighbourhood Plan Area and the determination of any planning applications. The emerging North Norfolk Local Plan covers the administrative area of the District Council, with the exception of the areas that are within the designated Broad's Area. The Broads Authority is the local planning authority for the designated Broads Area. The current adopted Local Plan is made up of the Core Strategy 2008 and the Site Allocations DPD 2011. These are shortly to be replaced with the updated and emerging single Local Plan. The emerging North Norfolk Local Plan sets the future strategic policy in relation to

key topics such as the environment, retail, housing, job creation and tourism, as well as identifying site allocations and setting the strategic policies to deliver sustainable growth over the Plan period 2016- 2036. The adopted Local Plan and the emerging Local Plan have both been subject to a Habitat Regulation assessments with the proposed submission version being subject to HRA December 2021.

- 4.3 ALL Norfolk authorities Local Plans have been subject to HRA and, (with the exception of the Broads Authority) **conclude that the in-combination growth that is planned across the county has the potential to have significant adverse impacts due to recreational pressure on the designated wildlife sites – referred to as a likely significant effect (LSE), in the HRAs.** In some cases the HRA's also conclude that there are also LSE from individual development alone, and as such specific mitigation may be required. Each LPAs Local Plan (recently adopted or emerging¹⁸) through policies contained in them, and informed by the Appropriate Assessments undertaken as part of the HRAs have specific links to the implementation of the Norfolk Wide Green Infrastructure Recreational Impact Avoidance Strategy, GIRAMs, as the agreed process of mitigation for recreational impacts. A Statement of Common Ground has been agreed with Natural England with respect to introduce the required strategic mitigation and to collect a strategic tariff contribution from all qualifying development from March 31st 2022.
- 4.4 Local planning authorities are the designated competent bodies and as such are responsible for ensuring that policies and proposals contained in their Development Plans (including neighbourhood Plans) and submitted as developer proposals **do not** have an adverse effect on the integrity of European sites, Es.
- 4.5 A screening process considered each policy and site proposal in the emerging Local plan and concluded that significant effects were likely except in relation to Overstrand Cliffs where Likely significant effects were ruled out and as such an Appropriate Assessment was required. The Appropriate Assessment undertaken for the proposed Submission Version submission, December 2021 considered the following Themes; Urban Effects, such as light, noise, cat predation, fly tipping, increased fire risk, vandalism and increased spread of invasive species, Recreation Effects , such as the pressures from the quantum of growth and Hydrological Impacts.

Mitigation measures were identified within the Appropriate Assessment and were incorporated within the Local Plan, resulting in a conclusion that the plan will not lead to any adverse effects on European sites within and in the vicinity of North Norfolk District.

- 4.6 The HRA for the adopted Site Specific DPD was undertaken in 2011 and concluded that there is the potential for disturbance to fen orchid at the Norfolk Valley Fens SAC However due to the nature of site and the limited visitation that it receives it can be concluded that levels of disturbance will be very low and there will be no adverse effect were concluded from the level of growth in the Core strategy. Adverse effects were not ruled out for the North Norfolk Coast and Wash SAC but following the appropriate mitigation measures subsequently incorporated it was concluded no adverse effects on the integrity of any of the Natura 2000 or Ramsar sites. Impacts on water quality and water resource from the proposed development at the time were also concluded to have no adverse effect on the integrity of any site as a result of the Plan at the time, (2007). The sites have since been delivered. The strategic policies of the Core Strategy

¹⁸ With the exception of the Broads Authority

were also subject to HRA along with each separate element in other policies and it was concluded that the development levels and policies were not likely to pose a likely significant effect either in isolation or cumulatively.

Urban Effects

4.7 Such issues relate to where urban development is in close proximity to European sites. The emerging Local Plan included an allocation H27/1 for employment use that is separated by a road and a belt of pine woodland from Holt Lowes. A further residential site H20 is also proposed to the north of the employment site. The Local Plan HRA identifies that the main urban effects would relate to fly tipping, spread of alien species, fire incidence, vandalism and that there may be issues in achieving the necessary management at the site (such as grazing). The Assessment concludes that the issues will relate specifically to Mackey's Hill Carpark area and the northern edge of the SAC. Given this very specific location and limited geographical focus the issues are addressed at project level HRA through appropriate wording in the local Plan.

Recreational Impacts

4.8 Different types of European sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex. Recreational pressure is likely to be generated by an increase in residents associated with the new housing but less so for employment development. Most types of European sites can be affected by trampling, which in turn causes soil compaction and erosion and the reduction on vegetation cover. Dog walkers can contribute to pressures on sites through nutrient enrichment via fouling. Nutrient poor habitats such as chalk grassland, heathland are particularly sensitive to the fertilising effects of dog faeces through inputs of phosphates and potassium. Most impacts occur close to paths. Disturbance of birds can adversely affect the condition and survival as the effects result in the birds spending unnecessary energy and detract from the bird's ability to feed. In addition, displacement can cause issues around increased pressure of other sites and in the case of ground nesting birds may increase the risk of leaving a nest along with eggs exposed to predators. In relation to public access conflict can arise between people and habitats in terms of compromising effective site management. Dogs rather than people are often the cause of worrying grazing animals.

4.9 In summary recreational use of a European site has the potential to:

- Cause damage to soils and vegetation through trampling and erosion;
- Cause disturbance to sensitive species, particularly ground-nesting birds and wintering wildfowl.
- Cause eutrophication as a result of dog fouling;
- Cause littering, giving rise to potential animal mortality, nutrient enrichment and small-scale pollution;
- Exacerbate existing management difficulties, for example by grazing being restricted

4.10 With in-combination LSE being identified through all residential and tourism related growth the Norfolk Authorities with guidance from Natural England have adopted a Norfolk-wide strategic solution which is informed by survey data and the emerging Plans growth levels. The Norfolk wide Green Infrastructure & Recreational Impact Avoidance and Mitigation Strategy, GIRAMS identifies a programme of County wide mitigation measures aimed at delivering the mitigation necessary to avoid and mitigate the predicted adverse effects on the integrity of the Habitats

Sites from the in-combination residential and tourist growth through a set programme funded by a per dwelling tariff calculated from the combined growth from all authorities, a specified mitigation package and the requirement for the provision of well-designed functional open space/green infrastructure on-site (alone effects) for appropriate developments of 50 units and above.

- 4.11 Recreation issues subject are subject to strategic mitigation brought forward through the GIRAMS and applied since 31 March 2022. Following the People over Wind Judgement¹⁹ when making screening decisions for the purposes of deciding whether an appropriate assessment is required, competent authorities cannot take into account any mitigation measures. The implications are considered in more detail in the initial screening section of this report.

Water Quality / Increased pressure on Water Resources

- 4.12 The east of England has been identified by the Environmental Agency as a region of considerable pressure of water resources and has been identified as an area of serious water stress, for the purposes of Regulation 4 of the Water Industry (Prescribed Condition) Regulation 1999 (as amended).
- 4.13 Pressure on water resources resulting in reduction of water levels or flow in streams, rivers and waterbodies would be a likely consequence of increased water demand requiring greater water abstraction from ground water or surface water. Surface water abstraction could have a direct impact upon water levels and stream flow, ground water abstraction would potentially lead to reduced flows in any watercourses which derive a significant proportion of their water from spring flow. Wetland European sites may be impacted by becoming too dry to support the special interest feature. Water supply to North Norfolk is from the North Norfolk Coast Cromer Ridge chalk aquifer, outside the neighbourhood plan area.
- 4.14 Anglian Water in its 2019 Water Resources Management Plan have identified the relevant Resource Zones to North Norfolk and outlines how Anglian Water will maintain a sustainable balance between water supplies and demand over the next 25yrs. The assessment and plan takes into consideration planned and predicted growth as well as climate change. All resource zones are forecast to be in deficit to 2045 prior to measures in the Plan being implemented. Anglian Water, through the Plan are committed to manage water resources by managing demand, from existing and proposed customers, i.e. supplying less water per customer and by transferring water from other areas, with no increase in abstraction from existing bore holes and no new abstractions. The Norfolk Planning Authorises through the Strategic Framework, in conjunction with Natural England, Environment Agency and Anglian Water, recognises that Plans should contribute to long-term water resilience and are committed to introducing the optional higher water efficiency standards across all authorities in the County in line with Government's Building Regulations requirement of 110 litres water use per person per day.

Nutrient Neutrality

- 4.15 As set out in the 25 Year Environment Plan, England's protected sites are a vitally important part of this government's commitments to the environment and includes a commitment to halt species decline by 2030. These sites represent some of the country's most sensitive and precious habitats, providing wintering and breeding habitats for wetland birds and support rare and

¹⁹ People Over Wind: European Court Case C-323/17 People Over Wind & Peter Sweetman v Coillte Teoranta 12 April 2018

characteristic species The sites provide many benefits to wider society including, carbon capture, flood control, climate change adaptations well as enhancing our access to nature with associated health benefits. However one of the significant causes of decline in our protected sites is the damage caused by nutrient pollution in water courses.

- 4.16 Nutrient pollution is a particular problem for freshwater habitats and estuaries. Increased levels of nutrients, especially nitrogen and phosphorus, can speed up the growth of certain plants, disrupting natural processes and impacting wildlife. This process damages water depended sites, harming the plants and wildlife, and affects the oxygen carrying capacity of the water. In technical terms its can put sites in “unfavourable condition”. The sources of excess nutrients are site specific, but predominantly originate from wastewater treatment works and agricultural pollution.
- 4.17 The Council has subsequently 16.3.22, been informed by Natural England of nutrient impacts in relation to the Broads Special Area of Conservation and the Wensum SAC and their catchments and how nutrient neutrality can be used as a potential mitigation to enable plans or projects to proceed without causing harm to the Habitat Sites affected. Local Planning Authorities have been advised both of these European sites are in unfavorable condition due to excess nutrients and that projects and plans should only go ahead if they will not cause additional pollution to sites. This means that new residential development can only happen if the nutrient load created through additional wastewater from development is mitigated and demonstrated through “nutrient neutrality”. This typically involves creating new wetlands to strip nutrients from water or creating buffer zones to revert to nature. Should development proposals or Plan fall into the identified catchments then there is the potential for a negative impacts on the number of homes that can be granted permission and or plan in the affected area.
- 4.18 Holt lies outside both the Broads and River Wensum catchments for nutrient neutrality. The Broad catchments as identified by Natural England are detailed in Appendix 4.

5 Screening Assessment: Test of Likely Significant Effects

- 5.1 The Council has subsequently 16.3.22, been informed by Natural England of nutrient impacts in relation to the Broads Special Area of Conservation and the Wensum SAC and their catchments and how nutrient neutrality can be used as a potential mitigation to enable plans or projects to proceed without causing harm to the Habitat Sites affected. Local Planning Authorities have been advised both of these European sites are in unfavorable condition due to excess nutrients and that projects and plans should only go ahead if they will not cause additional pollution to sites. This means that new residential development can only happen if the nutrient load created through additional wastewater from development is mitigated and demonstrated through “nutrient neutrality”. This typically involves creating new wetlands to strip nutrients from water or creating buffer zones to revert to nature. Should development proposals or Plan fall into the identified catchments then there is the potential for a negative impacts on the number of homes that can be granted permission and or plan in the affected area.
- 5.2 Holt lies outside both the Broads and River Wensum catchments for nutrient neutrality. The Broad catchments as identified by Natural England are detailed in Appendix 4.

What constitutes a likely significant effect?

- 5.3 The screening for likely significant effects of a plan involves checking all aspects of the plan and identifying any areas of potential concern, which are then examined in more detail in the appropriate assessment (stage 2) of HRA. The check for likely significant effects at this screening stage provides a provisional screening of the plan. It is undertaken to enable the plan maker – in this case the Parish Council to do two things; narrow down the elements of the plan that may pose a risk to European sites to highlight those options that are likely to be harmful and, where an option poses a risk but is a desired element of the plan, the screening exercise identifies where further assessment is necessary in order to determine the nature and magnitude of potential impacts on European sites and what could be done to eliminate those risks. Where further assessment is identified as necessary, this should be undertaken by a competent, suitably qualified and professional body. Further assessment and evidence gathering after early screening may include, for example, the commissioning of additional survey work, modelling, researching scientific literature or setting out justifications in accordance with expert opinion.
- 5.4 At the screening stage of HRA, there is the opportunity to identify changes to the plan that could be made to avoid risks to European sites, and this is particularly relevant at this stage in the plan making as issues can be identified up front and resolved with later iterations of the plan.
- 5.5 Where the screening identifies risks that cannot be avoided with simple clarifications or corrections, a more detailed assessment has to be undertaken to gather more information about the likely significant effects and give the necessary scrutiny to potential mitigation measures. This is the appropriate assessment stage of HRA.
- 5.6 A likely significant effect could be concluded on the basis of clear evidence of risk to European site interest, or there could be a scientific and plausible justification for concluding that a risk is present, even in the absence of direct evidence. **The latter is a precautionary approach**, which is one of the foundations of the high-level of protection pursued by EU policy on the environment, in accordance with the EU Treaty²⁰ **The precautionary principle should be applied at all stages in the HRA process and follows the principles established in case law**

²⁰ Article 191 of the Treaty on the Functioning of the EU. Previously Article 174 of the Treaty of the EC.

relating to the use of such a principle in applying the European Directives and domestic Habitats Regulations. In particular, the European Court in the ‘Waddenzee’ case¹² refers to “*no reasonable scientific doubt*” and in the ‘Sweetman’ case¹³ the Advocate General identified that a positive conclusion on screening for likely significant effects relates to where there “*is a possibility of there being a significant effect*”.

- 5.7 **The screening in this report looks at policies and options prior to any avoidance, reduction/mitigation measures in line with People Over Wind.** Mitigation potential can only be considered at Appropriate Assessment stage. People Over Wind clarified the need to carefully explain actions taken at each HRA stage, particularly at the screening for likely significant effects stage. The Judgment highlights the need for clear distinction between the stages of HRA, and good practice in recognising the function of each. The screening for likely significant effects stage should function as a screening or checking stage (regardless of avoidance, reduction/mitigation measures), to determine whether further assessment is required. Assessing the nature and extent of potential impacts on European site interest features, and the robustness of mitigation options, should be done at the appropriate assessment stage.

Assessment Matrix

- 5.8 The following key is used to assess the likely effects of the proposed policy on a sites qualifying features in Table 1.



No likely significant effect (NLSE) on the site’s qualifying features.



Likely significant effect (LSE) on the site’s qualifying features (with or without mitigation).



Uncertain likely significant effect.

Table 2: Assessment Matrix

Neighbourhood Plan policy	Policy feature	Potential impacts/effects of the development on the European site and why?	
		Likely Effect	Recommendations and opportunities
Policy 1 Design Guidance	Seeks to control the design of development – a criteria based approach reflecting the conservation Area Appraisal. Adopted Design Guide SPD (NNDC) and special interests and features of the neighbourhood Plan Area.	No LSE- The HNP does not bring forward any additional planned growth. The approach is primarily concerned with proposals acknowledging the suit of design guidance in existence and the towns setting as depicted though the Conservation Area Appraisal and key landscape characteristics.	N/A
Policy 2 Housing Mix and Tenure	Seeks to inform development proposals to address local requirements. The approach sets out areas of support towards dementia friendly properties, elderly specialist accommodation and provision of affordable housing	No LSE - The HNP does not bring forward any additional growth. The approach is primarily concerned with ensuring development is appropriate to the local needs and as such is a qualitative approach on existing dwellings and planned growth.	N/A
Policy 3 Green Infrastructure	Policy sets out a green infrastructure network and seeks to translate the provisions of green infrastructure policies in the Local Plan and emerging Local Plan into a specific, mapped network within the town and throughout the rest of the Parish.	No LSE –The approach is qualitative and does not promote a quantum of development or specific locations within the settlement boundary or increase in across the NPA. Elements of the approach are environmentally positive, the approach encourages enhancements and consideration of habitat connectivity.	N/A
Policy 4 Employment Growth in Holt	The policy seeks to priorities employment uses on already designated employment sites supporting Use Classes B2, B8, E(g) throughout and specifically hotel use C1 as an acceptable use on land at Old Station Rd	No LSE - The approach is primarily concerned with ensuring employment development is appropriate to the local needs and as such is a qualitative approach on employment designations.	N/A
Policy 5 Community Facilities	The policy identifies community facilities and seeks to ensure they are not lost or replaced through betterment through development	No LSE - Impact pathways highly unlikely for this development type	N/A

Policy 6 Connectivity in and Around Holt	This policy introduces the Holt Green Wheel concept and shows its extent on the policies map. The Policy seeks to ensure that major development supports and enhances connectivity to and throughout the green wheel.	No LSE –The approach is qualitative with the aim of protecting and enhancing connectivity and permeability and promoting non car use across the town.	N/A
Policy 7 Open Spaces	The policy designates two additional sites (outside the Local Plan) as open space and sets out an approach that seeks its retention	No LSE – The approach is primarily concerned with identifying two important open spaces and ensuring consideration is first given to that recreational use.	N/A

6 In-Combination Effects

- 6.1 Existing Plans and proposals must be considered when assessing new plans or programmes for likely significant effects as they may create in combination effects.
- 6.2 The Holt Neighbourhood Plan proposes no site allocations but is supportive through various criteria approaches of specific types of development in areas designated in the Local Plan. Other policies promote local considerations including the distinctive historical and landscape settings and are considered environmentally positive where they encourage enhancements and consideration of habitat connectivity. The emerging Local Plan does identify residential site allocations for development in the parish, as does the existing Development Plan, however those previously identified in the Site Specific DPD 2011 have all been built out. Those sites identified in the emerging Local Plan are considered strategic policies and as such lie outside this Neighbourhood Plan. As part of the plan development the emerging Local Plan has undergone detailed HRA and Appropriate Assessment and it has been concluded that the proposed submission version January 2022 is in conformity with the Habitats Regulations, and at a plan level a conclusion of no adverse effects, alone or in combination, on European site integrity has been drawn. This emerging neighbourhood Plan, March 2022 seeks to align its approaches and policies with the emerging Local Plan and adopted Plan. It is not promoting any quantum of development and as such the impacts of the plan on the integrity of the European sites is considered to be limited as the emerging Holt neighbourhood plan does not seek to increase in population and overall visitor numbers, and remains largely qualitative.
- 6.3 The Local Plan identifies Holt as a growth location. Outside the settlement boundary of the town the parish is classified as countryside policy area, where development is limited to that which requires a rural location. Proposals that do not accord with this as set out in Core Strategy policy SS2 will not be permitted. Holt is outside the catchment areas for Nutrient Neutrality as identified by Natural England March 2022 and detailed in appendix 4. The emerging Holt neighbourhood plan proposes no additional growth, and remains largely qualitative in its conformity with the adopted and emerging Local Plan. The neighbourhood Plan only seeks to add locally derived material considerations to guide and influence proposals to aid their application.

7 Overall Conclusion - Screening Outcome

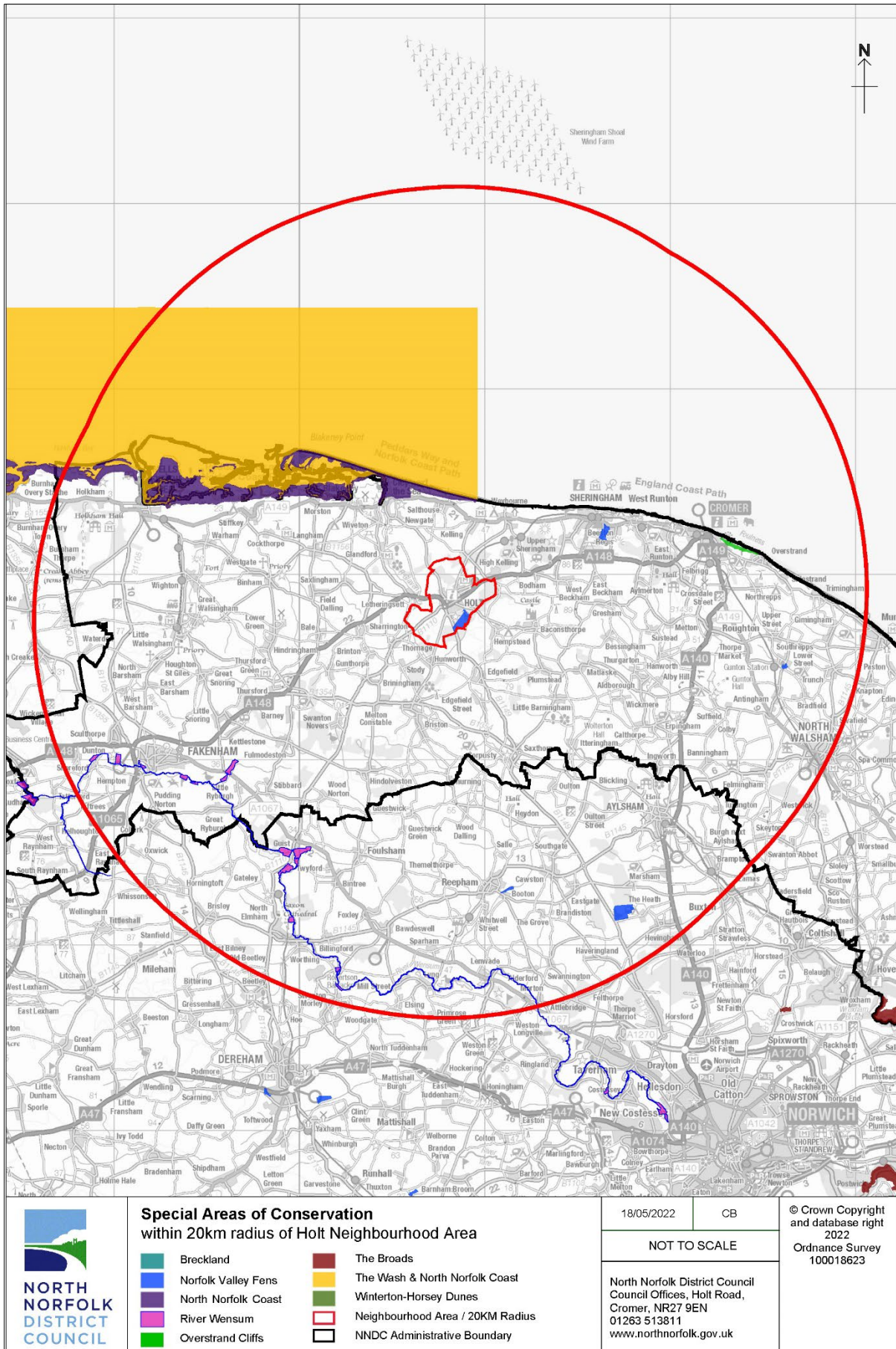
- 7.1 It is concluded that there are no likely adverse effects upon the integrity of any European site. This decision is subject to review following consultation with the statutory bodies.**

Next Stages

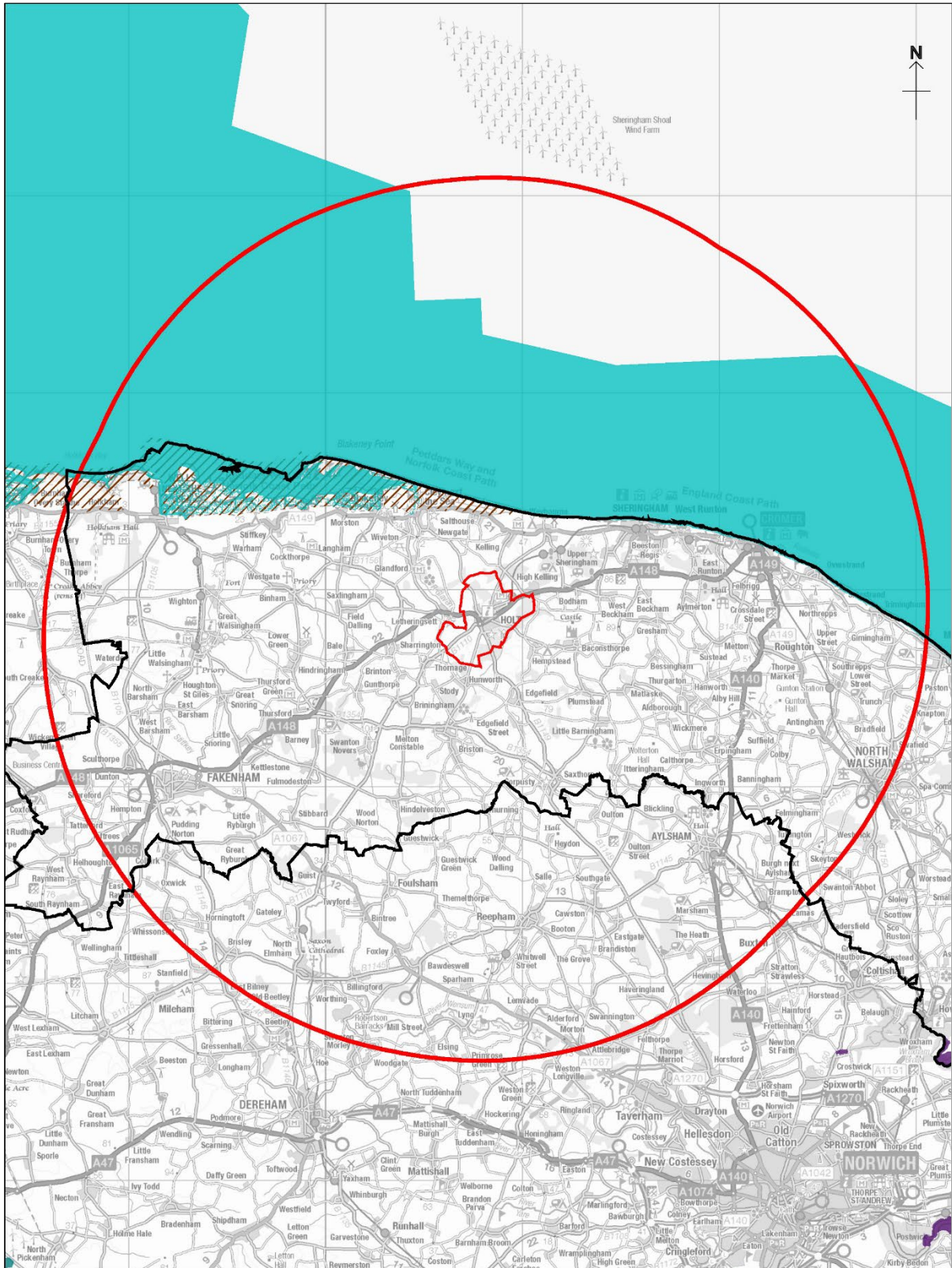
- 7.2 The outcome of this Screening Report is subject to review by the required statutory bodies, Environment Agency, Historic England and Natural England and North Norfolk District Council. The Screening Report and subsequent screening opinion may also need to be reviewed if significant changes are made to the emerging draft neighbourhood plan as a result of this review, other evidence that informs a significant change to the Plan and or further iterations by the parish Council prior to Submission Stage, (Regulation 16). A Screening Determination report on whether the emerging March 2022 version of the Holt Neighbourhood Plan does or does not require a Habitat Regulations Assessment will be issued following receipt of advice from the statutory consultation bodies on this report.






Appendix 1: Locations of European Sites

Proximity to Special Areas of Conservation

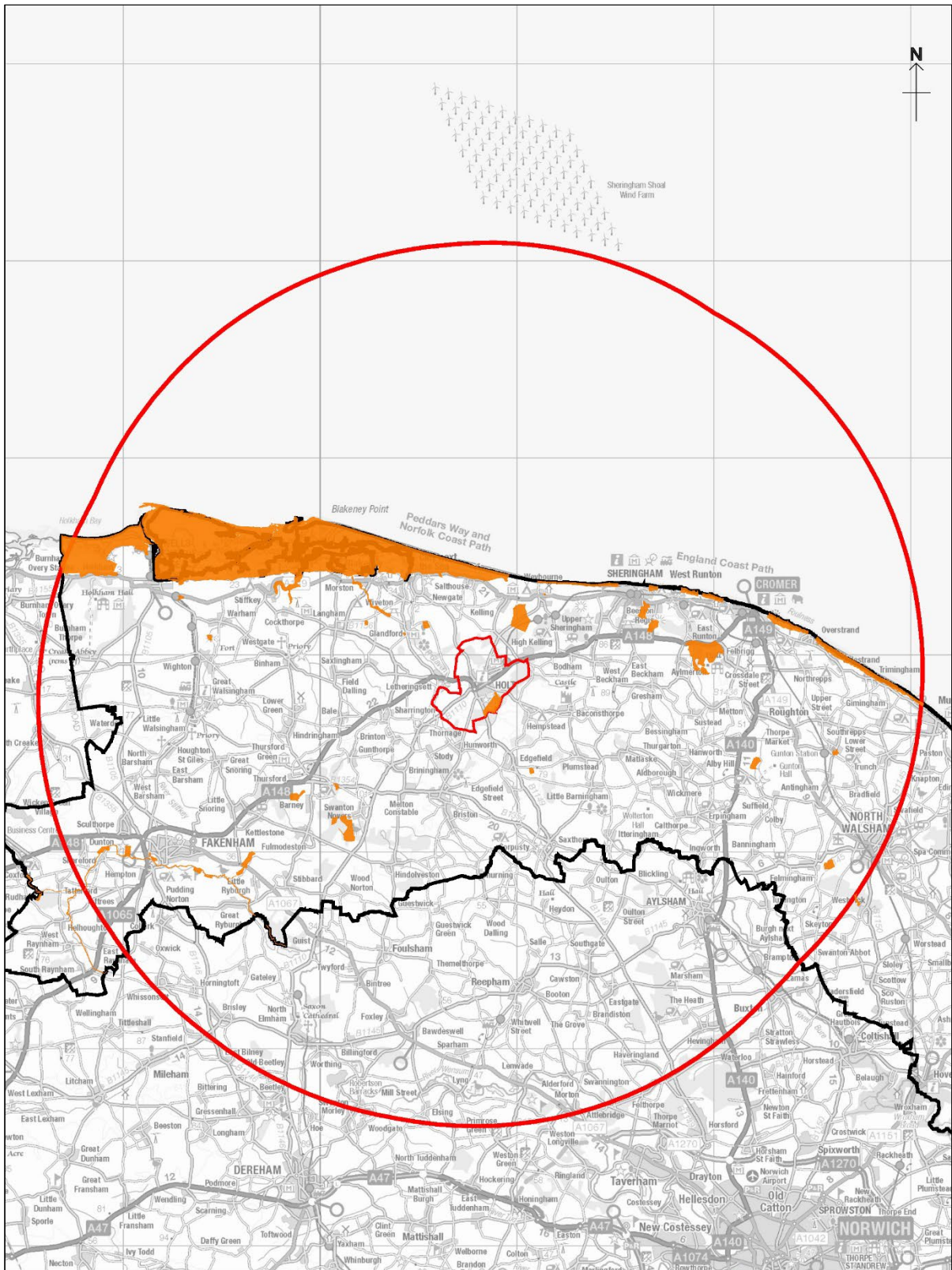



Proximity to Special Protection Areas & RAMSAR



 <p>NORTH NORFOLK DISTRICT COUNCIL</p>	<p>Special Protection Areas & RAMSAR Sites within 20km radius of Holt Neighbourhood Area</p> <ul style="list-style-type: none">  North Norfolk Coast SPA & North Norfolk Coast RAMSAR  Greater Wash SPA  Neighbourhood Area / 20KM Radius  NNDC Administrative Boundary 	18/05/2022	CB	<p>© Crown Copyright and database right 2022 Ordnance Survey 100018623</p>
		NOT TO SCALE		
		<p>North Norfolk District Council Council Offices, Holt Road, Cromer, NR27 9EN 01263 513811 www.northnorfolk.gov.uk</p>		

Proximity to Sites of Special Scientific Interest (SSSI)



 <p>NORTH NORFOLK DISTRICT COUNCIL</p>	<p>Sites of Special Scientific Interest (SSSI) within 20km radius of Holt Neighbourhood Area</p> <ul style="list-style-type: none"> SSSI Neighbourhood Area / 20KM Radius NNDC Administrative Boundary 	18/05/2022	CB	<p>© Crown Copyright and database right 2022 Ordnance Survey 100018623</p>
		NOT TO SCALE		
		<p>North Norfolk District Council Council Offices, Holt Road, Cromer, NR27 9EN 01263 513811 www.northnorfolk.gov.uk</p>		

Appendix 2: Natural England Conservation Advice for Marine Protected Areas Background information and Geology²¹

The following information is taken from Southern North Sea marine area site packages <https://www.gov.uk/government/publications/southern-north-sea-marine-area-index-map-and-site-packages> , last updated 15th September 2017.

The North Norfolk Coast SAC has an area of 3,207.37 ha and is located to the east of The Wash embayment on the East coast of England. The Annex I habitats that are marine features of the site include coastal lagoons and Mediterranean and thermo-Atlantic halophilous scrub, both of which are listed as primary reasons for selection of the site. Otter is the only Annex II species listed as a qualifying feature of the site.

Coastal lagoons are a priority habitat and are relatively uncommon in the UK. They can increase biodiversity and provide important habitats for breeding and overwintering birds; for this reason much of the coastal lagoon resource within the UK has been included in the SAC series.

The SAC was designated for percolation lagoons and together with the Orfordness-Shingle Street SAC and the Benacre-Eastern Bavenets SAC, forms a significant part of the percolation lagoon resource in this part of the UK. Percolation lagoons are separated from the sea by shingle banks, but allow sea water to enter by percolating through the shingle or by over-topping the bank (eg in storms). Salinity in the lagoons is maintained by this percolation of seawater through the beach or dune barrier with the substrate located at the bottom of the lagoons being generally made up of shingle covered by mud.

This site is particularly important for Mediterranean and thermo-Atlantic halophilous scrubs, as it is the only area where all the typical plant species for this habitat occur. The scrubby, salt-tolerant vegetation often develops in the uppermost levels of the saltmarsh, where there is saltmarsh to dune transition and also where dunes overlay shingle. Vegetation here is generally dominated by scattered shrubby bushes with patchy herbaceous plants and bryophytes.

The SAC is also important for otters. These animals became extinct in Norfolk in the 1980's but after a re-introduction, sightings of coastal otters have increased with them most likely using the inland areas for freshwater and using the coastline for hunting.

The pursuit of traditional activities, including those of common rights, and those embraced by the Longshore Economy such as samphire gathering, bait digging and wildfowling is widely recognised by Natural England and the other relevant authorities as a particularly important aspect of the local cultural heritage and economy at this site. Such activities are generally seasonal in nature, localised in their occurrence, employ traditional methods and place a strong emphasis on the principles of sustainability. The Wells, Boston and King's Lynn Advisory Groups' understanding of the levels of these activities since Regulation 33 advice was published in 2000, is that they have had no adverse effect on the site's condition and that there is evidence that some activities, particularly reed cutting and mussel cultivation, can make a positive contribution to the favourable condition of the site. It is thus agreed that such activities, including all the Common Rights on the north Norfolk coast between Holme and Holkham, as currently and historically practiced under law relating to Commons and carried out using traditional methods, are compatible with the need to maintain condition of the site's features.

As part of the development of the management scheme for the European marine site, the relevant authorities, advisory groups and local communities will need to continue to work together, to obtain a better shared understanding of the benefits and deficits of these activities as they change over

²¹ Natural England conservation advice for marine Protected Areas, <https://www.gov.uk/government/collections/conservation-advice-packages-for-marine-protected-areas>

time. This will provide an essential mechanism for determining whether fluctuations in these activities may have the potential to adversely affect the interest features of the site.

The Wash and North Norfolk SAC, encompasses the largest embayment in the UK, as well as:

- extensive intertidal sand and mudflats
- subtidal sandbanks
- biogenic and geogenic reef
- saltmarsh
- a barrier beach system, unique in the UK

Subtidal sandbanks and reefs are widespread throughout The Wash and North Norfolk coast. Commercially important fish species use sandbanks as nursery grounds and reefs are associated with elevated biodiversity and species abundance. The site has an outstanding example of the habitat *Sabellaria spinulosa* reef, which is of European significance. It is one of only five SACs in the UK where this habitat is the primary reason for the sites designation and contains a significant proportion of the *S. spinulosa* reef located on the eastern coast of the UK.

The large areas of intertidal sand and mudflats form important habitat for polychaete worms, bivalves and crustaceans and foraging ground for wading bird species. Mussel and cockle beds found on the intertidal flats also support important fisheries in the area.

Further inland, saltmarsh and saline reedbeds cover 7,642ha of the site. *Salicornia* and saltmarsh communities colonise the sand and mudflats. Atlantic salt meadows form one of the most diverse and extensive examples of this habitat in the UK. The high diversity of these salt meadows is partly due to the variety of specialist species associated with the different habitats present in the site.

The salt meadow expanse within the site also includes the only location in the UK where all the more typically Mediterranean species that characterise Mediterranean and thermo-Atlantic halophilous scrubs occur together. Four SACs have been designated for this habitat in the UK, totaling around 155ha, of which 107ha is located along the North Norfolk coast.

Coastal lagoons on the North Norfolk coast are maintained by the barrier beach system and inland coastal lagoons provide habitat for unique invertebrate communities

The site is also important for common seals *Phoca vitulina*, providing key habitat for breeding and hauling-out. The site is home to the largest colony of common seals in the UK, around 7% of the UK breeding population, and they can be found hauling out on sand and mudflats throughout in areas such as Blakeney Point. In addition, otters *Lutra lutra*, are also present in the site and included as a qualifying feature.

The pursuit of traditional activities, including those of common rights, and those embraced by the Longshore Economy such as samphire gathering, bait digging and wildfowling is widely recognised by Natural England and the other relevant authorities as a particularly important aspect of the local cultural heritage and economy at this site. Such activities are generally seasonal in nature, localised in their occurrence, employ traditional methods and place a strong emphasis on the principles of sustainability. The Wells, Boston and King's Lynn Advisory Groups' understanding of the levels of these activities since Regulation 33 advice was published in 2000, is that they have had no adverse effect on the sites condition and that there is evidence that some activities, particularly reed cutting and mussel cultivation, can make a positive contribution to the favourable condition of the site. It is thus agreed that such activities, including all the Common Rights on the north Norfolk coast between Holme and Holkham, as currently and historically practiced under law relating to Commons and carried out using traditional methods, are compatible with the need to maintain condition of the site's features.

As part of the development of the management scheme for the European marine site, the relevant authorities, advisory groups and local communities will need to continue to work together, to obtain a better shared understanding of the benefits and deficits of these activities as they change over time. This will provide an essential mechanism for determining whether fluctuations in these activities may have the potential to adversely affect the interest features of the site.

The North Norfolk SPA is located east of The Wash on the northern coastline of Norfolk, eastern England. The SPA covers 7886.79 ha and extends 40km from Holme to Weybourne and includes a great variety of coastal habitats; intertidal mudflats and sandflats, coastal waters, saltmarshes, shingle, sand dunes, freshwater grazing marshes and reedbeds.

The site is important within Europe as one of the largest areas of undeveloped coastal habitat of its type. It is the fourth most important wetland site for waterfowl in Britain. The site is particularly important for saltmarsh containing some of the best examples of this habitat type in Europe.

Other coastal habitats include extensive shingle deposits at Blakeney Point; major sand dunes at Scolt Head and extensive reedbeds at Brancaster, Cley and Titchwell and coastal grazing marsh also present at Cley. Freshwater grazing marsh is found all along the coast with that at Holkham notable for its network of clear dykes with a rich diversity of aquatic plant species.

The coastal waters along the North Norfolk Coast are shallow and follow the complex series of harbours and inlets along the coast. These support large populations of small fish including sand eel and sprat which provide vital food for breeding tern populations upon which breeding success depends. Terns use the vegetated and unvegetated shingle spits, bars and beaches for nesting.

The intertidal mud and sand flats support high densities of invertebrates important for breeding avocet and supporting high numbers of wading birds and wildfowl throughout the year. Additionally the remote nature of the habitats provides secure breeding sites for pink-footed geese (*Anser brachyrhynchus*) and dark-bellied brent geese (*Branta bernicula bernicula*).

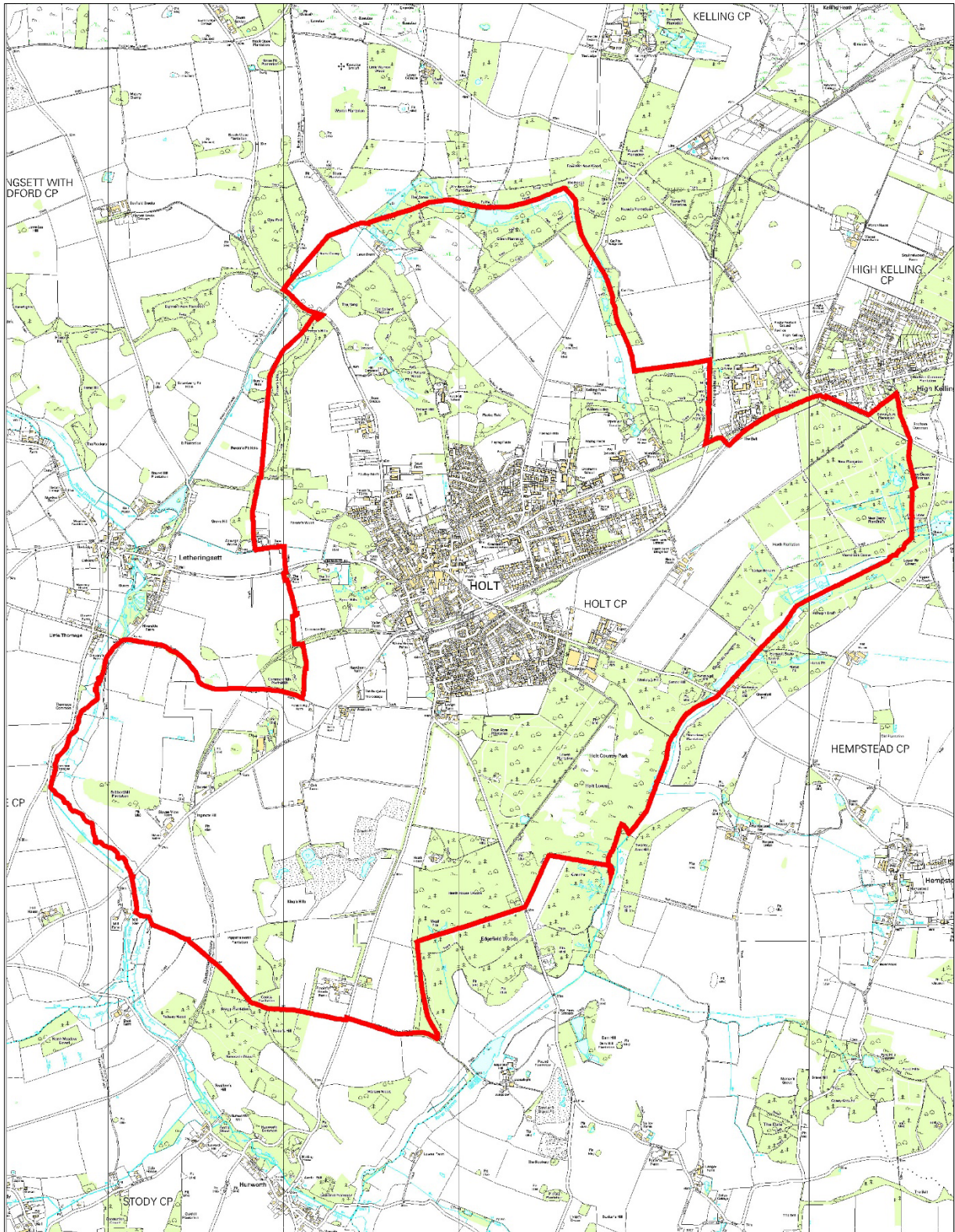
The saltmarsh supports breeding populations of skylark and meadow pipit. These in turn support internationally important breeding populations of marsh harrier. A variety of saltmarsh invertebrates also support wading birds.


Large numbers of waterbirds use the site throughout the year. In summer the site and its surroundings is important for breeding populations of waders, four species of tern, bittern (*Botaurus stellularis*) and wetland raptors including the marsh harrier (*Circus aeruginosus*). In winter, the site becomes important for large numbers of geese, sea-ducks, other ducks and waders using the site for roosting and feeding. Some species, such as some wintering sea-ducks, feed in coastal waters outside but adjacent to the SPA. The site is also important to migrating birds in the spring and autumn passage periods.

The pursuit of traditional activities, including those of common rights, and those embraced by the Longshore Economy such as samphire gathering, bait digging and wildfowling is widely recognised by Natural England and the other relevant authorities as a particularly important aspect of the local cultural heritage and economy at this site. Such activities are generally seasonal in nature, localised in their occurrence, employ traditional methods and place a strong emphasis on the principles of sustainability. The Wells, Boston and King's Lynn Advisory Groups' understanding of the levels of these activities since Regulation 33 advice was published in 2000, is that they have had no adverse effect on the sites condition and that there is evidence that some activities, particularly reed cutting and mussel cultivation, can make a positive contribution to the favourable condition of the site. It is thus agreed that such activities, including all the Common Rights on the north Norfolk coast between Holme and Holkham, as currently and historically practiced under law relating to Commons and carried out using traditional methods, are compatible with the need to maintain condition of the site's features.

As part of the development of the management scheme for the European marine site, the relevant authorities, advisory groups and local communities will need to continue to work together, to obtain a better shared understanding of the benefits and deficits of these activities as they change over time. This will provide an essential mechanism for determining whether fluctuations in these activities may have the potential to adversely affect the interest features of the site.

Appendix 3: Neighbourhood Plan Area



 <p>NORTH NORFOLK DISTRICT COUNCIL</p>	<p>Holt Neighbourhood Area</p> <p>North Norfolk District Council Council Offices, Holt Road, Cromer, Norfolk, NR27 9EN Tel: 01263 513811 Fax: 01263 515042</p>	<p>Scale = 1:30000 +USERID+</p>
		<p>+TIMEDATE+</p>
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Appendix 4: Nutrient Neutrality Catchment Areas

The Broads SAC Catchment Area (Natural England, March 2022)



European protected sites requiring nutrient neutrality strategic solutions

Scale: 1:330,000

Component SSSIs of The Broads SAC

- Local Authorities
- SSSI subject to nutrient neutrality strategy
- Nutrient neutrality SSSI catchment

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European protected sites requiring nutrient neutrality strategic solutions

Scale: 1:190,000

Component SSSIs of River Wensum SAC

- Local Authorities
- SSSI subject to nutrient neutrality strategy
- Nutrient neutrality SSSI catchment
- National Parks

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North Norfolk Coast SPA

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Natural England Conservation Advice for Marine Protected Areas

North Norfolk Coast SAC

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The Wash and North Norfolk Coast SAC

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Core Strategy, site specific DPD and emerging Local Plan

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