

HABITAT REGULATIONS SCREENING ASSESSMENT

ALFORD NEIGHBOURHOOD PLAN

Habitat Regulations Assessment Screening – Alford Neighbourhood Development Plan

The purpose of a Habitat Regulations Assessment is to identify whether any policies and land allocations in a Plan have potential to cause Likely Significant Effects (the terminology used for this assessment), either alone or in combination with other plans and programmes, upon sites that are protected at a European level for the quality of their biodiversity.

The first stage in this process is Screening. This is intended to establish which sites should come under the scope of the assessment and determines whether a plan can be said not to have an impact on those sites. If potential impact is identified, an Appropriate Assessment is required.

The stages in the screening process are:

1. Identify international sites in and around the plan/ strategy area;
2. Examine conservation objectives of the interest feature(s)(where available);
3. Review the policies and proposals of the plan and consider potential effects on European sites (magnitude, duration, location, extent);
4. Examine other plans and programmes that could contribute to 'in combination' effects;
5. Produce Screening Assessment

Stages 1 and 2 - Sites and Features

There are six area designated areas in East Lindsey, covered by eight different designations of three types – Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar site. The full details pertaining to the relevant designations on these sites are contained in the Screening Assessment of the East Lindsey Local Plan, available at the following link:

<https://www.e-lindsey.gov.uk/article/6304/Habitats-Regulations-Assessment->

The following is a summary of this information.

Humber Estuary - Special Protection Area, Special Area of Conservation and Ramsar Site;

Located to the north of the District, the Humber is the second-largest coastal plain estuary in the UK, and the largest coastal plain estuary on the east coast of Britain. It is a muddy, macro-tidal estuary, fed by the Rivers Ouse, Trent and Hull, Ancholme and Graveney. Suspended sediment concentrations are high, and are derived from a variety of sources, including marine sediments and eroding boulder clay along the Holderness coast. Habitats within the Humber Estuary include Atlantic salt meadows and a range of sand dune types in the outer estuary, together with subtidal sandbanks, extensive intertidal mudflats, glasswort beds and coastal lagoons. As salinity declines upstream, reedbeds and brackish saltmarsh communities fringe the estuary. Significant fish species include river lamprey *Lampetra fluviatilis* and sea lamprey *Petromyzon marinus* which breed in the River Derwent, a tributary of the River Ouse. The Humber Estuary Ramsar site supports a breeding colony of grey seals *Halichoerus grypus* at Donna Nook. It is the second largest grey seal colony in England and the southern-most regular breeding site on the east coast. The dune slacks at

SaltfleetbyTheddlethorpe on the southern extremity of the Ramsar site are the most north-easterly breeding site in Great Britain of the natterjack toad *Bufo calamita*.

Site sensitivities

The Humber Estuary is an extremely dynamic estuarine system with a high sediment budget, which results in changing morphology, allowing the movement of the intertidal and subtidal habitats in response to physical and biological variables. The habitats within the estuary are interdependent and inextricably linked to the structure and functioning of one another and of the system as a whole.

The Humber Estuary is subject to the impacts of human activities (past and present) as well as ongoing processes such as sea level rise and climate change. Key issues include coastal squeeze, impacts on the sediment budget, and changes to geomorphological structure and function of the estuary (due to sea level rise, flood defence works, dredging, and the construction, operation and maintenance of ports, pipelines and other infrastructure), changes in water quality and flows, pressure from additional built development, and damage and disturbance arising from access, recreation and other activities.

Conservation objectives

In order to maintain the international sites within the Humber Estuary in favourable condition, there should be no reduction in the extent of the following habitats:

- Estuary;
- Littoral sediment;
- Saline lagoons;
- Sand dunes; and
- Standing open water and canals.

There should also be no change in the composition of inshore sub-littoral sediment and biotope distribution should also be maintained for this habitat.

Saltfleetby-Theddlethorpe Dunes and Gibraltar Point – Special Area of Conservation;

The dune system on the composite Saltfleetby–Theddlethorpe Dunes and Gibraltar Point site contains good examples of shifting dunes. At this site the *Ammophila*-dominated dunes are associated with lyme-grass *Leymus arenarius* and sand sedge *Carex arenaria*.

Within this dune complex there are extensive areas of fixed dune vegetation within largely intact geomorphologically active systems. The lime-rich dunes support a rich and diverse flora, dominated by red fescue *Festuca rubra* and with unusual species including pyramidal orchid *Anacamptis pyramidalis*, bee orchid *Orchis apifera*, sea-holly *Eryngium maritimum* and sea campion *Silene maritima*. The fixed dunes are part of a successional transition.

This site supports a good example of dunes with *Hippophae rhamnoides* in the main part of its natural range in the UK. This habitat develops on dune areas and is present in a range of successional stages from early colonisation to mature scrub associated with elder *Sambucus nigra*, hawthorn *Crataegus monogyna* and ivy *Hedera helix*.

The humid dune slacks are part of a successional transition and some have developed from saltmarsh to freshwater habitats after becoming isolated from tidal inundation by sand deposition. There is a range of different communities present, many of which are species-rich.

Site sensitivities

The site is subject to a high number of visitors which require close management. Seaborne pollution, particularly accidental discharge from shipping or from inshore oil and gas drilling operations could pose problems for the site but contingency plans exist for dealing with oil spills.

Many of the vegetation types supported by sand dunes are fragile and vulnerable to erosion from heavy trampling. Where recreational pressures are significant enough to result in the loss of vegetation cover and prevent recovery, it may be necessary to take steps to manage access by putting boardwalks in or controlling activities in vulnerable areas such as the fore dunes. Such measures are already undertaken in places.

Where recreation pressure is not severe, the impact of trampling can help to retain diversity on some sites – sandy tracks break up the vegetation sward and provide areas of bare sand thus increasing the diversity of habitats available.

Conservation objectives

In order to maintain the international sites within The Wash in favourable condition, there should be no reduction in the extent of the following habitats:

- Coastal saltmarsh;
- Littoral sediment;
- Sabellaria spinulosa reefs;
- Saline lagoons;
- Coastal vegetated shingle; and
- Sub-littoral sands and gravels.

Gibraltar Point - Special Protection Area and Ramsar Site;

Gibraltar Point consists of an actively accreting sand-dune system, saltmarsh and extensive intertidal flats. All stages of dune development are represented with the older dunes extensively colonised by scrub. There are also small areas of freshwater marsh and open water. The site accommodates large numbers of overwintering birds and significant colonies of breeding little tern *Sterna albifrons*. The terns feed outside the SPA in nearby waters. The site is also important for waders during the spring and autumn passage period. The dune and saltmarsh habitats present on the site are representative of all the stages of colonisation and stabilisation. There is a fine example of freshwater marsh containing sedges *Carex* spp., rushes *Juncus* spp., and ferns, including adder's-tongue fern *Ophioglossum vulgatum*. Also most northerly example of nationally rare saltmarsh/dune communities containing sea heath *Frankenia laevis*, rock sea lavender *Limonium binervosum* and shrubby seablite *Suaeda vera*. It also supports an assemblage of wetland invertebrate species of which eight species are listed as rare in the British Red Data Book and a further four species listed as vulnerable.

Site sensitivities

Many of the vegetation types supported by sand dunes are fragile and vulnerable to erosion from heavy trampling. Where recreational pressures are significant enough to result in the loss of vegetation cover and prevent recovery, it may be necessary to take steps to manage access or controlling activities in vulnerable areas such as the fore dunes. It may also be necessary to manage access to limit the impacts of disturbance on breeding birds. Such measures are already undertaken in places.

There are a number of factors that are contributing to saltmarsh change including coastal erosion as a result of coastal flood-defence works, rising sea-levels, variations in sediment deposition, and land claim for development. The birds that use mud and sandflats for feeding and roosting are vulnerable to disturbance from human activities, for example, bait digging, dog walking and wildfowling. These activities can lead to reduced time spent feeding, or individuals being restricted to areas with a poor food supply.

The location and extent of mud or sandflats is dependent on the extent to which the estuary or coast where they occur is constrained from responding to sea level rise and changing sediment regimes.

Conservation objectives

In order to maintain Saltfleetby–Theddlethorpe Dunes and Gibraltar Point SAC in favourable condition, there should be no reduction in the extent of the following habitats:

- Sub-littoral sands and gravels;
- Littoral sediment;
- Coastal saltmarsh; and
- Coastal sand dune.

The Wash - Special Protection Area and Ramsar site;

The Wash is the largest estuarine system in the UK and is fed by the rivers Witham, Welland, Nene and Great Ouse that drain much of the east Midlands of England. The Wash comprises very extensive saltmarshes, major intertidal banks of sand and mud, shallow waters and deep channels. The intertidal flats have a rich invertebrate fauna and colonising beds of Glasswort *Salicornia* spp. which are important food sources for the large numbers of waterbirds dependent on the site. The sheltered nature of The Wash creates suitable breeding conditions for shellfish which are important food sources for some waterbirds. The Wash is of outstanding importance for a large number of geese, ducks and waders, both in spring and autumn migration periods, as well as through the winter. The SPA is especially notable for supporting a very large proportion (over half) of the total population of Canada/Greenland breeding knot *Calidris canutus islandica*. In summer, the Wash is an important breeding area for tern species and as a feeding area for marsh harrier *Circus aeruginosus* that breed just outside the SPA.

Site sensitivities

The biological richness of The Wash is largely dependent on the physical processes that dominate the natural systems and consequently the ecological vulnerability is closely linked to the physical environment. The intertidal zone is vulnerable to coastal squeeze as a result of land-claim, coastal

defence works, sea-level rise, and storm surges. Intertidal habitats are potentially affected by changes in sediment budget caused by dredging and coastal protection, construction of river training walls and flood defence works.

Activities affecting sediment budget and anthropogenic causes of coastal squeeze will be addressed through the management scheme being developed jointly for the SAC/SPA on the site.

The estuary is fed by four large rivers which drain a substantial area of Eastern England. The volume and quality of water entering The Wash is dependent on the use made of these rivers for water abstraction and agricultural and domestic effluents – such consents and licenses are managed under the provisions of the Habitats Regulations.

Conservation objectives

In order to maintain Gibraltar Point SPA and Ramsar sites in favourable condition, there should be no reduction in the extent of the following habitats:

- Littoral sediment;
- Coastal saltmarsh; and
- Coastal sand dune.

The Wash and North Norfolk Coast Special Area of Conservation;

This site represents one of the largest expanses of sublittoral sandbanks in the UK. The subtidal sandbanks vary in composition and include coarse sand through to mixed sediment at the mouth of the embayment. Sublittoral communities present include large dense beds of brittlestars *Ophiothrix fragilis*. The subtidal sandbanks provide important nursery grounds for many commercial fish species. The Wash is the second largest area of intertidal flats in the UK. The sandflats in the embayment include extensive fine sands and drying coarse sand banks, and this, coupled with variety in degree of exposure, means that there is a high diversity relative to other east coast sites. Sandy intertidal flats predominate, with some soft mudflats in the areas sheltered by barrier beaches and islands along the north Norfolk coast. The Wash is the largest embayment in the UK and is connected via sediment transfer systems to the north Norfolk coast. The embayment supports a variety of mobile species, including fish species and common seal *Phoca vitulina*. In the tide-swept approaches to the Wash, the polychaete worm *Sabellaria spinulosa* forms areas of biogenic reef. The site and its surrounding waters is the only known location of well-developed stable *Sabellaria* reef in the UK. The east coast of England is one of the few areas in the UK where saltmarshes are generally accreting. The proportion of the total saltmarsh vegetation represented by *Salicornia* and other annuals is high because of the extensive enclosure of marsh in this site. The vegetation is also unusual in that it forms a pioneer community with common cord-grass *Spartina anglica*. This site is designated for the extensive ungrazed saltmarshes of the north Norfolk Coast and for the traditionally grazed saltmarshes around the Wash. The Wash saltmarshes represent the largest single area of this habitat type in the UK. Saltmarsh swards dominated by sea-lavenders *Limonium* spp. are particularly well-represented. The Wash and North Norfolk Coast comprises the only area in the UK where all the more typically Mediterranean species that characterise Mediterranean and thermo-Atlantic halophilous scrubs occur together. The vegetation is dominated by a cover of

shrubby sea-blite and sea-purslane *Atriplex portulacoides*, with a patchy cover of herbaceous plants and bryophytes.

Site sensitivities

The site is vulnerable to natural sea level rise, storm surges and changes in erosion patterns which are increasingly likely to affect the freshwater grazing marsh and reedbed habitats. Increasing interest in abstraction of groundwater for irrigation of arable land may affect freshwater spring flows onto grazing marshes and would be addressed through application of provisions under the Habitat Regulations. The site is visited by a large number of tourists especially in the summer.

By their very nature embryonic shifting dunes are restricted in the area they can occupy. They are made even scarcer by the fact that only a relatively small number of dunes are actively prograding, the condition under which this habitat type develops best. Embryonic shifting dunes are also particularly vulnerable to trampling by beach users and to mechanical cleaning of beaches, and this may well be a significant factor in limiting their extent.

Conservation objectives

In order to maintain the international sites within The Wash in favourable condition, there should be no reduction in the extent of the following habitats:

- Coastal saltmarsh;
- Littoral sediment;
- Sabellaria spinulosa reefs;
- Saline lagoons; and
- Sub-littoral sands and gravels.

In order to maintain the condition of the site, the population of common seals must display a stable or increasing usage of the site.

and

Greater Wash – Special Protection Area.

The Greater Wash was classified as an SPA in March 2018. It is classified for the protection of red-throated diver (*Gavia stellata*), common scoter (*Melanitta nigra*), and little gull (*Hydrocoloeus minutus*) during the non-breeding season, and for breeding Sandwich tern (*Sterna sandvicensis*), common tern (*Sterna hirundo*) and little tern (*Sternula albifrons*). This site protects important foraging areas for the largest breeding populations of little tern in the UK marine SPA network (798 pairs), and important areas used by the second largest non-breeding populations of red-throated diver (1,407 individuals) and little gull (1,255 individuals) within the UK SPA network. The boundary of the Greater Wash SPA extends beyond 12 nautical miles; hence it is a site for which both Natural England and JNCC have responsibility to provide statutory advice. The SPA lies along the east coast of England in the mid-southern North Sea and extends between the counties of Yorkshire (to the north) and Suffolk (to the south).

Site Sensitivities and Conservation Objectives for this site are still being developed.

The Greater Wash is the closest site to Alford and is protected for its populations of breeding and non-breeding birds. It covers an extensive area, stretching some circa 3,536km². The Greater Wash is a marine SPA so extends from the high water mark to approximately 14 nautical miles out to sea. The area provides important foraging areas for a number of species of bird. While the site sensitivities have yet to be established, there will be some similarities to the marine aspects of the other internationally protected sites along the coast. Such as sensitivity to human recreational activity and disturbance, particularly beyond the high water mark, flood defence work and dredging, storm surges, seaborne pollution and off shore wind farm development.

Stage 3 - Alford Neighbourhood Plan

Alford Neighbourhood Plan has been prepared by a dedicated group under the auspices of Alford Town Council. Once the Plan is made (adopted by the District Council) it will form part of the development plan and will be used in the decision making process on planning applications. The Plan contains 11 policies covering a range of issues, including housing, town centre vitality and viability, green space, heritage and design. It also allocates sites to accommodate 43 dwellings and 0.5 hectare of employment land.

Alford lies the following distances from the protected sites:

Humber Estuary - Special Protection Area (11km), Special Area of Conservation (17.5km) and Ramsar Site (11km);

Gibraltar Point - Special Protection Area (18.3km);

The Wash - Special Protection Area (20.3km) and Ramsar site (18.25km);

Saltfleetby-Theddlethorpe Dunes (11.8km) and Gibraltar Point (17.5km) – Special Area of Conservation;

The Wash and North Norfolk Coast Special Area of Conservation (20.5km).

Greater Wash – Special Protection Area (8km).

Below is an assessment of each policy, looking at the possible impact of the policy, whether this will have Likely Significant Effects on the designated site or sites, if there are any in combination effects which have Likely Significant Effects and whether Appropriate Assessment is required.

Policy/ Allocation	Possible Impact	Risk of Likely Significant Effects (LSE)?	Potential Impacts from other Plans and Programmes	Risk of 'In Combinations' Likely Significant Effects (LSE)	Appropriate Assessment Required
Policy 1 – Site Allocation	<p>This policy is the primary policy for the allocation of land for housing in Alford. The Strategic Allocation for the whole of East Lindsey was assessed through the HRA of the East Lindsey Local Plan. The ANP allocated sites for 43 plots within the built part of the town. However, this, in combination with the additional planning permissions granted in the town means that the housing target for the Town has been exceeded by 44 units. This represents an additional 0.5% of the overall housing allocation for the District. As the overall target was assessed as not having Likely Significant Effects, it is unlikely that the quantum allocated in Alford would produce Likely Significant Effects, either on its own or in combination with the overall housing distribution. The closest of the sites (either allocated or granted planning permission) lies 8.6km from the nearest protected site (Greater Wash SPA). The combination of the distance and the scale of development reduce the opportunities for direct impact on the site. There may some additional visitor pressure along the coast from the additional residents. Using Alford's average of 2.27</p>	No	<p>The housing provision in the ANP forms part of the wider delivery of housing development across the whole of East Lindsey's administrative district. The overall housing requirement for East Lindsey, including that required for Alford was assessed as part of the HRA of the East Lindsey Local Plan. The ANP allocated sites for 43 plots within the built part of the town. However, this, in combination with the additional planning permissions granted in the town means that the housing target for the Town has been exceeded by 44 units. This represents an additional 0.5% of the overall housing allocation for the District. As the overall target was assessed as not having Likely Significant</p>	No	No

	<p>persons per household, these sites would add 100 people to the town. There are 11 access points, ranging from 8.6km to 12.3km from closest allocated site, facilitating access to the closest protected site. The access points deliver a range of visitor experience from simple car parks with no facilities to visitor centres. This variety means the additional residents seeking recreation along the coast are likely to be distributed across a number of these sites and the impact of the additional development either on one part of the protected site or across the site as a whole (which extends to circa 3536km²) is not considered to have Likely Significant Effects.</p>		<p>Effects, it is unlikely that the quantum allocated in Alford would produce Likely Significant Effects, either on its own or in combination with the overall housing distribution.</p>		
Policy 2 – Local Connection Criteria	<p>This policy has a more administrative aspect to it and will not impact on protected sites.</p>	No	None	No	No
Policy 3 – Residential Development	<p>Policy 3 sets the criteria for determining applications for windfall residential development in the town. The policy seeks to focus development within the built form of the town, providing easy access to the services and facilities in the town and seeking the use of brownfield land. The quantum of development that may come forward through that policy cannot be predicted. However, used in combination with the East Lindsey Local Plan policies to protect biodiversity, it is considered that this policy will not have Likely Significant Effects on the protected sites.</p>	No	<p>Any development coming forward under this policy will have to be seen in the context of the District wide policies for housing development, including windfall development. However, given the criteria in policy 3 which focus development within the built form of the town, it is considered that there will be few opportunities to add significantly to the amount of development across the District and therefore there</p>	No	No

			will be no Likely Significant Effects arising, in combination, from policy 3.		
Policy 4 – Flood Risk	This policy addresses development in a flood risk area and is not considered to have Likely Significant Effects on the protected sites.	No	The policy forms part of a wider approach to flood risk across the District and beyond but will not have in combination Likely Significant Effects.	No	No
Policy 5 – Town Centre Vitality and Viability	Policy 5 sets out the uses that would be considered appropriate in the Town Centre and the approach to such development proposed outside the town centre. It is unlikely to add to the creation of development that could impact on protected sites some 8km distant and so is considered not to have Likely Significant Effects.	No	The policy works in conjunction with policies for retail development across East Lindsey but will not have in combination Likely Significant Effects.	No	No
Policy 6 – Employment	The East Lindsey Local Plan identifies a need for 1ha of employment land in Alford. That requirement was assessed under the East Lindsey HRA, although the exact location of the land within the town was not known. Due to a shortage of available sites, the ANP has allocated 0.5ha of land for employment, so falling within the quantum which was subject to HRA in the East Lindsey Local Plan. The ANP has also identified a further 3.18ha of land on two additional sites which could be considered suitable if their availability changed. The allocated site is well within the built form of the town. The type of development which will come forward on the site is not known at this time but it is	No	The requirement for employment land in Alford forms part of wider plans for employment development across East Lindsey. There are sites closer to the protected sites which have already been assessed under the HRA of the East Lindsey Local Plan. The current allocation in Alford will not create Likely Significant Effects in combination with other plans and programmes as it has already been factored in to the previous	No	No

	<p>identified for B1 and B8 uses. The nature of employment covered by B1 and B8 uses mean that they are unlikely to cause any effects through smoke, fumes and other pollutants that are likely to impact on the protected sites along the coast 8.6km (and further) to the east. The two identified but unallocated sites are on the western side of the town, are within the built form of the town and are 10km from the closest protected site. One of these sites is also identified for B1 and B8 uses with the third also allowing B2 uses. The site which can accommodate B2 uses is an extension of the existing industrial estate and is adjacent to existing residential development. The policy requires that development does not harm the amenities of residents and development with significant pollution risks is unlikely to be forthcoming. It is therefore considered that the presence of the employment land will not cause Likely Significant Effects.</p>		<p>assessment. The additional sites which have not been allocated are over and above this requirement but, as part of an overall District wide strategy for employment land are unlikely to add to potential impacts on the protected sites due to the requirements in the policy, the distance from the designated sites and the sensitivities and conservation objectives for the sites.</p>		
Policy 7 – Local Green Space	<p>The policy seeks to protect identified area of green space in the town and will have no Likely Significant Effect on the internationally protected biodiversity sites.</p>	No	None	No	No
Policy 8 – Green Infrastructure and Connectivity	<p>This policy seeks the protection and enhancement of public rights of way, green space and trees and hedgerows in the town. As the policy is seeking to promote recreational opportunities in the town it may reduce some of the movement of people to the protected coastal area for recreation. It is</p>	No	None	No	No

	considered that the policy will have no Likely Significant Effects.				
Policy 9 – Sport and Leisure Facilities	Policy 9 seeks to support the provision of new sport and leisure facilities and protect existing ones. As with policy 8, there may be some benefits to increasing sport and leisure facilities in the town to reducing the number of residents seeking leisure opportunities at the coast. It will have no Likely Significant Effects on the internationally protected biodiversity sites.	No	None	No	No
Policy 10 – Heritage and Design	Policy 10 provides a framework for historic buildings and the conservation area; it will have no Likely Significant Effects on the internationally protected biodiversity sites.	No	None	No	No
Policy 11 – Renewable Energy and Energy Efficiency	The policy supports buildings which are energy efficient and incorporate renewable technology. As the scale of the potential development is small and not proximate to the designated sites there will be no Likely Significant Effects.	No	None	No	No

Stage 4 – In combination Effects

Most of the policies in the Alford Neighbourhood Plan are discrete to the town and will not work in combination with wider plans or programmes in respect of impacts beyond the town. The only policies which form part of a wider strategy with development implications are the policies for housing (Policy 1) and employment land (policy 6) in that they connect to the wider development strategy in the East Lindsey Local Plan. However, the East Lindsey Local Plan is district wide and so distributes development across a wide area. The aspects of the Plan that are relevant to Alford are expressed through the Alford Neighbourhood Plan so are, for the most part, one and the same, with the exception of a small quantum of housing and employment development which it is considered will not have Likely Significant Effects.

Stage 5 – Screening Assessment

As a result of the above assessment of policies and potential in combination effects, it is considered that the policies in the Alford Neighbourhood Plan will have no Likely Significant Effects on the internationally protected biodiversity sites in the area. For the majority of the policies, they do not extend spatially beyond the parish of Alford and address proposals of a type and nature e.g. green space and historic environment which do not add to development pressures on the designated sites. The only policies that have potential for wider scope are Policy 1 – Site Allocations and Policy 6 - Employment. However, in the case of policy 1, it is considered that the amount of development over and above that assessed in the Habitat Regulations Assessment of the East Lindsey Local Plan is of such a scale and distance from the protected sites that it would not have a Likely Significant Effect. Similarly, the quantum of Employment land allocated has already been assessed through the Habitat Regulations Assessment of the East Lindsey Local Plan and the location of the site, the relative small scale (0.5ha) and the distance from the internationally designated sites means that this too is not deemed to have Likely Significant Effects. The two non-allocated but identified employment sites are also of a type and scale that are unlikely to have impact on the designated sites when viewed in relation to the site requirements in the policy, the distance from the protected sites and the sensitivities and conservation objectives for the designated sites.