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# Assessment of England Coast Path proposals between Bawdsey and Aldeburgh on sites of European importance for nature conservation

January 2021





**Assessment of Coastal Access proposals under  
regulation 63 of the  
Habitats Regulations 2017 (as amended)  
(‘Habitats Regulations Assessment’)**

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**Assessment of England Coast Path proposals between  
Bawdsey and Aldeburgh**

**on the Alde-Ore Estuary Ramsar site, Alde-Ore Estuary  
Special Protection Area (SPA), Outer Thames Estuary SPA,  
Sandlings SPA, Alde-Ore & Butley Estuaries Special Area of  
Conservation (SAC), Orfordness-Shingle Street SAC and the  
Southern North Sea SAC**

**20 January 2021**



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# Assessment of Coastal Access proposals under regulation 63 of the Habitats Regulations 2017 (as amended) ('Habitats Regulations Assessment')

## Summary

### I) Introduction

This is a record of the Habitats Regulations Assessment ('HRA') undertaken by Natural England (in its role of competent authority) in accordance with the assessment and review provisions of the Conservation of Habitats and Species Regulations 2017 (as amended) ('the Habitats Regulations').

Natural England has a statutory duty under the Marine and Coastal Access Act 2009 to improve access to the English coast. This assessment considers the potential impacts of our detailed proposals for coastal access from Bawdsey to Aldeburgh on the following sites of international importance for wildlife: Alde-Ore Estuary Ramsar, Alde-Ore Estuary Special Protection Area (SPA), Outer Thames Estuary SPA, Alde-Ore & Butley Estuaries Special Area of Conservation (SAC), Orfordness-Shingle Street SAC, Southern North Sea SAC.

**This assessment should be read alongside Natural England's related Coastal Access Reports which between them fully describe and explain its access proposals for the stretch as a whole. The Overview explains common principles and background and the reports explain how we propose to implement coastal access along each of the constituent lengths within the stretch.**

<https://www.gov.uk/government/publications/england-coast-path-from-bawdsey-to-aldeburgh-comment-on-proposals>

### II) Background

This stretch extends from Bawdsey to Fort Green car park in Aldeburgh, including inland routes around the River Alde and the Butley River.

**Table 1. Summary of the main wildlife interest**

Interest	Description
Non-breeding wetland bird assemblage	A variety of species use the mosaic of brackish saltmarsh and mudflat habitats within the Alde-Ore Estuary and Butley River. Boyton, Hollesley and Hazlewood Marshes are managed nature reserves which provide suitable habitats to support significant bird populations.
Breeding Gull assemblage	Gulls breed at Lantern Marshes on Orford Ness although nests are susceptible to ground predators here including rats. A few nest on the pagoda structures where they are protected from this threat. Havergate Island supports breeding gull populations and the Hollesley and Boyton Marshes also support these birds.



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Interest	Description
Breeding Avocets, Terns	Avocet numbers on the Alde-Ore SPA have been in decline since 2000, perhaps exacerbated by increased nest predation by gulls on Havergate Island and flooding of the Orford Ness nesting sites during the 2013 tidal surge. Works have been conducted to encourage avocet breeding in key sites including the Hollesley and Hazlewood Marshes and on Orford Ness. This species’ foraging is particularly concentrated around Iken, Snape and the Butley River. Terns have nested on the shingle at Shingle Street, Orford Ness and on Havergate Island although their numbers have declined across the SPA since designation.
Marsh Harrier	Breeding marsh harrier are known to occupy the Alde-Ore SPA area, with pairs recorded on Orford Ness and the upper reaches of the Butley River, and historically at Hazlewood Marshes. Outside of the protected sites, breeding has been recorded at Hollesley and Boyton Marshes and at Stanny Farm in Iken.
Heathland and Ground Nesting birds	Nightjar and woodlark are features of the Sandlings SPA and are known at the Snape Warren heathland area managed by the RSPB.
Invertebrate assemblage	A mixed habitat assemblage of invertebrates covering sand and shingle, wetland, woodland, and aquatic species including the starlet sea anemone <i>Nematostella vectensis</i> . Although not a designated feature, survey work in 2020 found the rare snail <i>Vertigo angustior</i> present in a further extensive area near Snape.
Plant Assemblage	These include plants from a range of coastal habitats from the eelgrass <i>Zostera angustifolia</i> which grows in sheltered tidal mudflats to <i>Frankenia laevis</i> , sea heath scrub.
Intertidal habitat	Mudflat and sandflat habitats support overwintering birds and as such are protected under the SAC designation.
Vegetated Shingle	Vegetated shingle at Shingle Street and Orford Ness is protected under a SAC designation, the latter containing an excellent examples of zonation within the shingle vegetation. The underlying Shingle Street SSSI is assessed as being in ‘unfavourable, no change’ condition although this habitat is growing in size due to coastal processes.
Saline Lagoon Margins	A series of percolation lagoons are present at Shingle Street which have developed in the shingle bank adjacent to the shore at the mouth of the Ore estuary. These lagoons are known to support vegetation including the spiral tasselweed <i>Ruppia cirrhosa</i> .



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Interest	Description

### III) Our approach

Natural England's approach to ensuring the protection of sensitive nature conservation features under the Coastal Access Programme is set out in section 4.9 Coastal Access: Natural England's Approved Scheme 2013. Ref [1].

Our final published proposal for a stretch of England Coast Path is preceded by detailed local consideration of options for route alignment, the extent of the coastal margin and any requirement for restrictions, exclusions or seasonal alternative routes. The proposal is thoroughly considered before being finalised and initial ideas may be modified or rejected during the iterative design process, drawing on the range of relevant expertise available within Natural England.

Evidence is also gathered as appropriate from a range of other sources which can include information and data held locally by external partners or from the experience of local land owners, environmental consultants and occupiers. The approach includes looking at any current visitor management practices, either informal or formal. It also involves discussing our emerging conclusions as appropriate with key local interests such as land owners or occupiers, conservation organisations or the local access authority. In these ways, any nature conservation concerns are discussed early and constructive solutions identified as necessary.

The conclusions of our assessment are certified by both the member of staff responsible for developing the access proposal and the person responsible for considering any environmental impacts. This ensures appropriate separation of duties within Natural England.

### IV) Aim and objectives for the design of our proposals

The new national arrangements for coastal access will establish a continuous well-maintained walking route around the coast and clarify where people can access the foreshore and other parts of the coastal margin. These changes will influence how people use the coast for recreation and our aim in designing our detailed proposals has been to secure and enhance opportunities for people to enjoy their visit whilst ensuring appropriate protection for affected European sites.

A key consideration in developing coastal access proposals for Bawdsey to Aldeburgh has been the possible impact of disturbance on breeding birds as a result of recreational activities, and particularly visitors with dogs.

Objectives for design of our detailed local proposals have been to:

- Avoid exacerbating issues at sensitive locations by making use of established coastal paths



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- Where there is no suitable established and regularly used coastal route, develop proposals that take account of risks to sensitive nature conservation features and incorporate mitigation as necessary in our proposals
- Clarify when, where and how people may access the foreshore and other parts of the coastal margin on foot for recreational purposes
- Work with local partners to design detailed proposals that take account of and complement efforts to manage access in sensitive locations
- Where practical, incorporate opportunities to raise awareness of the importance of this stretch of coast for wildlife and how people can help efforts to protect it.

### V) Conclusion

We have considered whether our detailed proposals for coastal access between Bawdsey and Aldeburgh might have an impact on sites of European conservation interest. In Part C of this assessment we identify some possible risks to the relevant qualifying features and conclude that proposals for coastal access, without incorporated mitigation, may have a significant effect on these sites. In Part D we consider these risks in more detail, taking account of avoidance and mitigation measures incorporated into our access proposal, and conclude that there will not be an adverse effect on the integrity of any site. These measures are summarised in Table 2 below.

**Table 2. Summary of risks and consequent mitigation built into our proposals**

Risk to conservation objectives	Relevant design features of the access proposal
<p>Non-breeding wetland bird assemblage - through disturbance</p>	<p>Many parts of the route are aligned along existing coastal access routes including Public Rights of Way (PRoWs) and the Suffolk Coast Path.</p> <p>New access is proposed around the Butley River which is an important area for overwintering birds and has been considered in detail. A suite of interpretation panels will be installed at locations likely to be seen by visitors approaching the estuary to inform them of wildlife interest and asking that dogs are kept under control and are not allowed to enter the water. They will also outline further mitigation measures walkers may encounter, namely two alternative winter routes with accompanying restrictions on the main routes, and a dogs to leads restriction. The alternative routes will be used from 1<sup>st</sup> September to 31<sup>st</sup> March. The installation of signage, new gates, steps and benches will promote the appropriate use of these routes.</p> <p>Around the Alde-Ore Estuary several interpretation panels are proposed which will inform visitors of the wildlife</p>



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Risk to conservation objectives	Relevant design features of the access proposal
	sensitivities of the area. In addition, worn routes through the reedbeds near to Iken cliffs will be blocked by brash to prevent access and therefore decrease the likelihood of bird disturbance events.
Breeding gull assemblage - through disturbance	<p>The main breeding locations for gulls are on Havergate Island and on Orford Ness.</p> <p>Havergate Island is not covered by coastal access rights and therefore existing management will continue.</p> <p>Orford Ness falls within coastal margin but access restrictions are proposed across most of the spit which will result in the existing management on site continuing unchanged.</p>
Breeding avocets and terns - through disturbance	<p>At Shingle Street we propose to clearly waymark the path to encourage users to remain on this. We are aligning along the Suffolk Coastal Path.</p> <p>There is no additional access to the Hollesley, Boyton or Hazlewood Marshes where there are avocet breeding sites. Site management at Orford Ness is not anticipated to change.</p>
Breeding marsh harrier - through disturbance	We are not proposing any additional access over the Hollesley or Boyton Marshes which lie landwards of the path. A proposed seasonal route around part of the Alde-Ore Estuary will reduce potential disturbance to this species at this location and a restriction on access for public safety will increase spatial separation between walkers and potential nest sites.
Heathland and Ground nesting birds – through disturbance	The alignment across Snape Warren Open Access land has been designed to minimise impacts on these species. Existing management includes dogs to leads signage and the route will be clearly waymarked, with few attractors into the coastal margin. As a result of recent surveys, the coastal margin south and east of the arable fields at New England Farm, Snape, will be restricted.
Coastal plant assemblage – through trampling	Much of the route alignment is on a clearly demarked seawall which will be well waymarked, and much of the





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Risk to conservation objectives	Relevant design features of the access proposal
	seawards coastal margin is covered by an s25A access exclusion.
Vegetated shingle – through trampling	<p>We anticipate a negligible increase in use of the coastal margin at Shingle Street, and are clearly waymarking the trail landwards of the expanse of shingle.</p> <p>We do not anticipate a change in management at Orford Ness.</p>
Aquatic Invertebrates - through trampling	<p>The alignment past the lagoons south of Shingle Street follows the Suffolk Coast Path on an existing PRoW.</p> <p>We do not anticipate a change in management at Orford Ness.</p>
Fresh/brackish Aquatic Plant Assemblage - through trampling	Much of the route alignment is on a clearly demarked seawall which will be well waymarked, and much of the seawards coastal margin is covered by an s25A access exclusion.
Coastal lagoons – saline lagoon margins – through trampling	<p>The alignment past the lagoons south of Shingle Street follows the Suffolk Coast Path on an existing PRoW.</p> <p>We do not anticipate a change in management at Orford Ness.</p> <p>Much of the route alignment is along a seawall/embankment which is easy to follow, and which will be well waymarked to encourage walkers to remain on the main path. Much of the seawards coastal margin is covered by an s25A access exclusion.</p>
Installation of infrastructure - through disturbance to birds	<p>The local authority is to schedule installation works with Natural England to limit disturbance risk.</p> <p>Operators are to use hand tools wherever practicable.</p> <p>Operators working within 200m and within sight of roost sites should halt activity 2 hours before and after high tide whenever possible.</p>



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Risk to conservation objectives	Relevant design features of the access proposal
	Installation should be confined to daylight hours and the site designed in such a way to minimise disturbance impacts.

### VI) Implementation

Once a route for the trail has been confirmed by the Secretary of State, we will work with Suffolk County Council to ensure any works on the ground are carried out with due regard to the conclusions of this appraisal and relevant statutory requirements.

### VII) Thanks

The development of our proposals has been informed by input from people with relevant expertise within Natural England and other key organisations. The proposals have been thoroughly considered before being finalised and our initial ideas were modified during an iterative design process. We are particularly grateful to the RSPB, Suffolk Wildlife Trust, National Trust, British Trust for Ornithology (BTO), Suffolk Moth Group and to other organisations and local experts whose contributions and advice have helped to inform development of our proposals.



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## PART A: Introduction and information about the England Coast Path

### A1. Introduction

Natural England has a statutory duty under the Marine and Coastal Access Act 2009 to improve access to the English coast. The duty is in two parts: one relating to securing a long-distance walking route around the whole coast: we call this the England Coast Path; the other relating to a margin of coastal land associated with the route where in appropriate places people will be able to spread out and explore, rest or picnic.

To secure these objectives, we must submit reports to the Secretary of State for Environment, Food and Rural Affairs recommending where the route should be and identifying the associated coastal margin. The reports must follow the approach set out in our methodology (the Coastal Access Scheme), which – as the legislation requires – has been approved by the Secretary of State for this purpose.

Where implementation of a Coastal Access Report would be likely to have a significant effect on a site designated for its international importance for wildlife, called a 'European site'<sup>1</sup>, the report must be subject to special procedures designed to assess its likely significant effects.

The conclusions of this screening are certified by both the member of staff responsible for developing the access proposal and the person responsible for considering any environmental impacts. This ensures appropriate separation of duties within Natural England.

Natural England's approach to ensuring the protection of sensitive nature conservation features under the Coastal Access Programme is set out in the Coastal Access Scheme (Ref [1]). Note that, following a ruling by the Court of Justice of the European Union (Case C-323/17 – usually cited as *People over Wind*), we have issued a technical memorandum concerning the application of this methodology where assessment under the Habitats Regulations is required.

### A2. Details of the plan or project

This assessment considers Natural England's proposals for coastal access along the stretch of coast between Bawdsey and Aldeburgh. Our proposals to the Secretary of State for this stretch of coast are presented in a series of reports that explain how we propose to implement coastal access along each of the constituent lengths within the stretch. Within this assessment we consider each of the relevant reports, both separately and as an overall access proposal for the stretch in question.

Our proposals for coastal access have two main components:

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<sup>1</sup> Ramsar sites are treated in the same way by UK government policy



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- alignment of the England Coast Path; and,
- designation of coastal margin.

### England Coast Path

A continuous walking route around the coast – the England Coast Path National Trail - will be established by joining up existing coastal paths and creating new sections of path where necessary. The route will be established and maintained to National Trail quality standards. The coastal path will be able to 'roll back' as the occasional cliffs on this stretch erode or slip, solving long-standing difficulties with maintaining a continuous route on this stretch of coast.

### Coastal Margin

An area of land associated with the proposed trail will become coastal margin, including all land seawards of the trail down to mean low water.

Coastal margin is typically subject to new coastal access rights, though there are some obvious exceptions to this. The nature and limitations of the new rights, and the key types of land excepted from them, are explained in more detail in Chapter 2 of our Coastal Access Scheme (Ref [1]). Where there are already public or local rights to do other things, these are normally unaffected and will continue to exist in parallel to the new coastal access rights. The exception to this principle is any pre-existing open access rights under Part 1 of the Countryside and Rights of Way Act 2000 (CROW) over land falling within the coastal margin: the new coastal access rights will apply in place of these.

Where public access on foot already takes place on land within the margin without any legal right for people to use the land in this way, the new coastal access rights will secure this existing use legally. Access secured in this way is subject to various national restrictions. It remains open to the owner of the land, should they wish, to continue tolerating other types of established public use not provided for by coastal access rights.

Of particular relevance to this assessment is that most areas of salt marsh and mud flat within the Alde-Ore and Butley Estuaries are considered unsuitable for public access and will be excluded from the new coastal access rights at all times regardless of any other considerations.



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### **PART B: Information about the European Sites which could be affected**

#### **B1. Brief description of the European Sites and their Qualifying Features**

##### **Alde-Ore Estuary Ramsar Site**

The site comprises the estuary complex of the rivers Alde, Butley and Ore, including Havergate Island and Orford Ness. There are a variety of habitats including intertidal mudflats, saltmarsh, vegetated shingle (including the second-largest and best-preserved area in Britain at Orfordness), saline lagoons and grazing marsh. The Orfordness/Shingle Street landform is unique within Britain in combining a shingle spit with a cusped foreland. The site supports nationally-scarce plants, British Red Data Book invertebrates, and notable assemblages of breeding and wintering wetland birds (source: Ramsar Information Sheet).

##### **Alde-Ore Estuary Special Protection Area (SPA)**

The Alde-Ore Estuary is located on the Suffolk coast in eastern England. It comprises the estuarine complex of the rivers Alde, Butley and Ore, including Havergate Island and Orfordness. There is a variety of habitats including intertidal mud-flats, saltmarsh, vegetated shingle (including the second-largest and best-preserved area in Britain at Orfordness), saline lagoons and semi-intensified grazing marsh. The Orfordness/Shingle Street land form is geomorphologically unique within the UK in combining a shingle spit with a cusped foreland. The diversity of wetland habitat types present is of particular significance to the birds occurring on the site as these provide a range of opportunities for feeding, roosting and nesting within the site complex. At different times of the year, the site supports notable assemblages of wetland birds including seabirds, wildfowl and waders. As well as being an important wintering area for waterbirds, the Alde-Ore Estuary provides important breeding habitat for several species of seabird, wader and raptor. During the breeding season, gulls and terns feed substantially outside the SPA (source: SPA description).

##### **Outer Thames Estuary SPA**

The Outer Thames Estuary SPA covers a large marine & coastal area stretching from Caister-on-Sea in Norfolk down the Suffolk coast to Sheerness on the Kent coastline, and reaching as far as Canvey Island into the Thames Estuary. The SPA consists of areas of shallow and deeper water, high tidal current streams and a range of mobile sediments. Large areas of mud, silt and gravelly sediments form the deeper water channels, including the port approaches to London. The coastal parts of the site consist of shingle and sand beaches, rapidly eroding low cliffs and mudflat-lined estuaries. The site is designated for non-breeding red-throated diver (*Gavia stellata*), a diving bird which breeds on the freshwater lochs of Scotland (and Scandinavia) and which overwinters in large numbers within the southern North Sea, feeding predominately on fish. The site is also designated for breeding common tern (*Sterna hirundo*) and little tern (*Sternula albifrons*). Both tern species breed on the dynamic Scroby Sands intertidal sandbank, located 6km offshore from Great Yarmouth and within



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this SPA. The Outer Thames Estuary SPA protects important at-sea foraging waters for common and little tern which breed at seven adjacent SPAs: Great Yarmouth North Denes; Benacre to Easton Bavents; Breydon Water; Minsmere-Walberswick; Alde-Ore Estuary; Foulness; and Thanet Coast and Sandwich Bay SPAs. The coastal waters of the SPA are used for foraging, as well as a wide range of maintenance activities such as bathing and loafing.

### **Sandlings SPA**

The Sandlings SPA covers all or part of several SSSIs in the area due to their European ornithological importance. In particular, for their breeding populations of Nightjars *Caprimulgus europaeus* and Woodlarks *Lullula arborea*. Part of this SPA overlies the Snape Warren SSSI which is of relevance to this stretch. The heaths across this SPA support both acid grassland and heather dominated plant communities, with dependant invertebrate and bird communities of conservation value. Woodlark and nightjar have adapted to breeding in the large conifer forest blocks in the SPA, using areas that have recently been felled and recent plantation, as well as areas managed as open ground.

### **Alde-Ore & Butley Estuaries Special Area of Conservation (SAC)**

The Alde, Ore and Butley Estuaries SAC includes 3 rivers; the Alde, Butley, and Ore, as well as Havergate Island. The site is located on the Suffolk coast between Aldeburgh and Bawdsey. The River Alde runs south along the inner side of the Orford Ness shingle spit and subsequently becomes the River Ore. The Butley River flows into it shortly after Havergate Island.

The overlapping Alde-Ore Estuary Special Protection Area (SPA) holds nationally and internationally important populations of breeding and overwintering birds. This is due to the availability of good roosting habitats and the variety of invertebrates, such as *Macoma balthica* and *Manayunkia aestuarina* communities spread throughout the estuary. Additionally, they are important as they contain 25 saltmarsh communities. These communities include nationally important species such as small cord grass (*Spartina maritima*), which is declining in extent. The site also has the only record of extended sedge (*Carex extensa*) in Suffolk.

The UK is internationally important for estuaries, as it holds over a quarter of the area of north-western Europe's estuaries. This estuary is bar-built, meaning it is a partially drowned river valley with a sediment bar across the mouth. It is the only estuary with a shingle bar in the UK. Historically the River Alde entered the sea at Orford, since then the shingle bar has been pushing the mouth of the estuary steadily south-westwards.

### **Orfordness - Shingle Street SAC**

The Orford Ness - Shingle Street SAC was designated on 1 April 2005 and is located on the Suffolk coast between Aldeburgh and Bawdsey. The reasons for designation were the 3 qualifying features; coastal lagoons, stony banks and annual vegetation of drift lines.

The most extensive of these features are the stony banks particularly at the southern end of the spit. They consist of shingle and form ridges supporting a variety of vegetation. The Orford Ness shingle

spit is important as it supports one of the largest natural expanses in the UK of shingle vegetation affected by salt spray.

Shingle deposits close to the highest tide line host the annual vegetation of drift lines. Occurring at both the sheltered western side of the spit and the eastern exposed coast, this rare fringing habitat is colonised by plant species tolerant to saltwater and periodic disruption.

The site's lagoons are some of the best examples in the UK. A European priority feature, the waters of these lagoons range from fresh to highly saline and support a range of plant species typical of lagoons. Algal species within the lagoons provide habitat for an abundance of lagoon invertebrates. These in turn support important bird communities, such as avocet (*Recurvirostra avosetta*) and spoonbill (*Platalea leucorodia*). Another notable species is the rare starlet sea-anemone.

### Southern North Sea Special Area of Conservation (SAC)

The Southern North Sea SAC covers a marine & coastal area of importance for harbour porpoise. This site includes key winter and summer habitat for this species and covers an area over three times the size of Yorkshire, making it the largest SAC in UK and European waters at the point of designation in 2019. Located to the east of England, this site stretches from the central North Sea (north of Dogger Bank) to the Straits of Dover in the south, covering an area of 36 951km<sup>2</sup>. The majority of this site lies offshore, though it does extend into coastal areas of Norfolk and Suffolk crossing the 12 nautical mile boundary.

**Table 3. Qualifying features**

Qualifying feature	Alde-Ore Estuary Ramsar	Alde-Ore Estuary SPA	Outer Thames Estuary SPA	Sandlings SPA	Alde-Ore & Butley Estuaries SAC	Orfordness-Shingle Street SAC	Southern North Sea SAC
A081 <i>Circus aeruginosus</i> ; Eurasian marsh harrier (Breeding)		✓					
A132 <i>Recurvirostra avosetta</i> ; Pied avocet (Non-breeding)	✓	✓					
A132 <i>Recurvirostra avosetta</i> ; Pied avocet (Breeding)		✓					
A151 <i>Philomachus pugnax</i> ; Ruff (Non-breeding)		✓					
A162 <i>Tringa totanus</i> ; Common redshank (Non-breeding)	✓	✓					
A183 <i>Larus fuscus</i> ; Lesser black-backed gull (Breeding)	✓	✓					
A191 <i>Sterna sandvicensis</i> ; Sandwich tern (Breeding)		✓					

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A195 <i>Sternula albifrons</i> ; Little tern (Breeding)		✓	✓				
A193 Common tern <i>Sterna hirundo</i> (breeding)			✓				
A001 Red-throated diver <i>Gavia stellata</i> (non-breeding)			✓				
Breeding Wetland Bird Assemblage  European marsh harrier <i>Circus aeruginosus</i> Mediterranean gull <i>Larus melanocephalus</i> Sandwich tern <i>Sterna (Thalasseus) sandvicensis sandvicensis</i> Little tern <i>Sternula albifrons albifrons</i>	✓						
Water bird assemblage (non-breeding)  Black-tailed godwit <i>Limosa limosa islandica</i> Spotted redshank <i>Tringa erythropus</i> Common greenshank <i>Tringa nebularia</i> Greater white-fronted goose <i>Anser albifrons albifrons</i> Common shelduck <i>Tadorna tadorna</i> Eurasian wigeon <i>Anas penelope</i> Eurasian teal <i>Anas crecca</i> Northern pintail <i>Anas acuta</i> Northern shoveler <i>Anas clypeata</i>	✓						
A224 <i>Caprimulgus europaeus</i> ; European nightjar (Breeding)				✓			
A246 <i>Lullula arborea</i> ; Woodlark (Breeding)				✓			
Wetland invertebrate assemblage  <i>Nematostella vectensis</i> & <i>Gammarus insensibilis</i> of saline lagoons <i>Malacosoma castrensis</i> <i>Campsicnemus magius</i> <i>Cheilosia velutina</i> <i>Empis prodomus</i> <i>Dixella attica</i> <i>Hylaeus euryscapus</i> <i>Pseudamnicola confusa</i> <i>Euophrys browni</i> <i>Baryphyma duffeyi</i> <i>Haplodrassus minor</i> <i>Trichoncus affinis</i>	✓						



Wetland plant assemblage	✓						
<i>Althaea officinalis</i>							
<i>Frankenia laevis</i>							
<i>Lathyrus japonicus</i>							
<i>Lepidium latifolium</i>							
<i>Medicago minima</i>							
<i>Parapholis incurva</i>							
<i>Puccinellia fasciculata</i>							
<i>Ruppia cirrhosa</i>							
<i>Sarcocornia perennis</i>							
<i>Sonchus palustris</i>							
<i>Trifolium suffocatum</i>							
<i>Vicia lutea</i>							
<i>Zostera angustifolia</i>							
Estuaries					✓		
Mudflat and sandflat not covered by seawater at low tide					✓		
Atlantic salt meadows ( <i>Glaucopuccinellietalia maritimae</i> )					✓		
1150 Coastal Lagoons						✓	
1210 Annual vegetation of drift lines						✓	
1220 Perennial vegetation of stony banks						✓	
Harbour porpoise <i>Phocoena phocoena</i>							✓

Note: as listed in the qualifying feature table above Eurasian marsh harrier, pied avocet, common redshank, common greenshank, common shelduck, Eurasian wigeon, Eurasian teal, northern pintail, northern shoveler and European nightjar will be referenced as marsh harrier, avocet, redshank, greenshank, shelduck, wigeon, teal, pintail, shoveler and nightjar respectively in the remainder of the assessment.

## B2. European Site Conservation Objectives (including supplementary advice)

Natural England provides advice about the Conservation Objectives for European Sites in England in its role as the statutory nature conservation body. These Objectives (including any Supplementary Advice which may be available) are the necessary context for all HRAs.

The overarching Conservation Objectives for every European Site in England are to ensure that the integrity of each site is maintained or restored as appropriate, and that each site contributes to achieving the aims of the Habitats Regulations, by either maintaining or restoring (as appropriate):

- The extent and distribution of their qualifying natural habitats,
- The structure and function (including typical species) of their qualifying natural habitats,



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- The supporting processes on which their qualifying natural habitats rely,
- The supporting processes on which the habitats of their qualifying features rely,
- The population of each of their qualifying features, and
- The distribution of their qualifying features within the site.

Where Conservation Objectives Supplementary Advice is available, which provides further detail about the features' structure, function and supporting processes mentioned above, the implications of the plan or project on the specific attributes and targets listed in the advice will be taken into account in this assessment.

In light of the European Sites which could be affected by the plan or project, this assessment will be informed by the following site-specific Conservation Objectives, including any available supplementary advice.

Supplementary advice on the conservation objectives for the following sites can be viewed at <https://designatedsites.naturalengland.org.uk> and <http://publications.naturalengland.org.uk>. Alternatively click the designated area titles below for further information:

[Alde-Ore Estuary Ramsar](#)

[Alde-Ore Estuary Special Protection Area \(SPA\)](#)

[Outer Thames Estuary SPA](#)

[Sandlings SPA](#)

[Alde-Ore & Butley Estuaries Special Area of Conservation \(SAC\)](#)

[Orfordness-Shingle Street SAC](#)

[Southern North Sea SAC](#)

For Ramsar sites, a decision has been made by Defra and Natural England not to produce Conservation Advice packages, instead focussing on the production of High Level Conservation Objectives. As the provisions on the Habitats Regulations relating to Habitat Regulations Assessments extend to Ramsar sites, Natural England considers the Conservation Advice packages for the overlapping European Marine Site designations to be, in most cases, sufficient to support the management of the Ramsar interests.



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### PART C: Screening of the plan or project for appropriate assessment

#### C1. Is the plan or project either directly connected with or necessary to the (conservation) management (of the European Site's qualifying features)?

The Coastal Access Plan is not directly connected with or necessary to the management of the European or Ramsar sites for nature conservation listed in B1 above.

**Conclusion:**

As the plan or project is not either directly connected or necessary to the management of all of the European site(s)'s qualifying features, and/or contains non-conservation elements, further Habitats Regulations assessment is required.

#### C2. Is there a likelihood [or risk] of significant [adverse] effects ('LSE')?

This section details whether those constituent elements of the plan or project which are (a) not directly connected with or necessary to the management of the European Site(s) features and (b) could conceivably adversely affect a European site, would have a **likely significant effect**, either alone or in combination with other plans and projects, upon the European sites and which could undermine the achievement of the site's conservation objectives referred to in section B2.

In accordance with case law, this HRA has considered an effect to be 'likely' if it '*cannot be excluded on the basis of objective information*' and is 'significant' if it '*undermines the conservation objectives*'. In accordance with Defra guidance on the approach to be taken to this decision, in plain English, the test asks whether the plan or project '*may*' have a significant effect (i.e. there is a risk or a possibility of such an effect).

This assessment of risk therefore takes into account the precautionary principle (where there is scientific doubt) and **excludes**, at this stage, any measures proposed in the submitted details of the plan/project that are specifically intended to avoid or reduce harmful effects on the European site(s).

Each of the project elements has been tested in view of the European Site Conservation Objectives and against each of the relevant European site qualifying features. An assessment of potential effects using best available evidence and information has been made.

## C2.1 Risk of Significant Effects Alone

The first step is to consider whether any elements of the project are likely to have a significant effect upon a European site ‘alone’ (that is when considered in the context of the prevailing environmental conditions at the site but in isolation of the combined effects of any other ‘plans and projects’). Such effects do not include those deemed to be so insignificant as to be trivial or inconsequential.

In this section, we assess risks to qualifying features, taking account of their sensitivity to coastal walking and other recreational activities associated with coastal access proposals, and in view of each site’s Conservation Objectives.

For the purposes of this assessment, the qualifying features of the European Sites listed in B1 have been grouped as follows:

**Table 4. Feature groups**

Feature group	Qualifying feature(s)
Non-breeding wetland bird assemblage	Black-tailed godwit <i>Limosa limosa islandica</i> Spotted redshank <i>Tringa erythropus</i> Common greenshank <i>Tringa nebularia</i> Greater white-fronted goose <i>Anser albifrons albifrons</i> Common shelduck <i>Tadorna tadorna</i> Eurasian wigeon <i>Anas penelope</i> Eurasian teal <i>Anas crecca</i> Northern pintail <i>Anas acuta</i> Northern shoveler <i>Anas clypeata</i> Pied avocet <i>Recurvirostra avosetta</i> Common redshank <i>Tringa totanus</i> Ruff <i>Philomachus pugnax</i>
Non-breeding red-throated diver	Red-throated diver <i>Gavia stellata</i>
Breeding gull assemblage	Assemblage of breeding birds (lesser black-backed gull, Mediterranean gull)
Breeding avocets and terns	Avocet; little tern; Sandwich tern, common tern
Breeding marsh harrier	Marsh harrier
Heathland and ground nesting birds	Nightjar; woodlark
Saltmarsh & wetland invertebrates	<i>Malacosoma castrensis</i> ; <i>Dixella attica</i> ; <i>Campsicnemus magius</i>



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Feature group	Qualifying feature(s)
Woodland invertebrates	<i>Cheilosia velutina</i> ; <i>Empis prodomus</i>
Shingle & tidal litter invertebrates	<i>Euophrys browning</i> (accepted name now <i>Pseudeuophrys obsoleta</i> ); <i>Hylaeus euryscapus</i> ; <i>Haplodrassus minor</i> ; <i>Trichoncus affinis</i> ; <i>Baryphyma duffeyi</i> (accepted name now <i>Praestigia duffeyi</i> )
Aquatic invertebrates	<i>Nematostella vectensis</i> ; <i>Gammarus insensibilis</i> of saline lagoons; <i>Pseudamnicola confusa</i>
Fresh/brackish aquatic plant assemblage	<i>Althaea officinalis</i> ; <i>Sonchus palustris</i> ; <i>Ruppia cirrhosa</i>
Coastal plant assemblage	<i>Zostera angustifolia</i> ; <i>Frankenia laevis</i> ; <i>Lepidium latifolium</i> ; <i>Parapholis incurve</i> ; <i>Puccinellia fasciculate</i> ; <i>Sarcocornia perennis</i> ; <i>Vicia lutea</i> ; <i>Trifolium suffocatum</i> ; <i>Medicago minima</i>
Intertidal and associated habitat	Atlantic salt meadows: <i>Glauco-Puccinellietalia maritimae</i> ; Estuaries (Atlantic salt meadows <i>Glauco-Puccinellietalia maritimae</i> , Intertidal coarse sediment, Intertidal mixed sediments, Intertidal mud, Intertidal sand and muddy sand, Subtidal mixed sediments, Subtidal mud); Mudflat and sandflat not covered by seawater at low tide (Intertidal coarse sediment, Intertidal mixed sediments, Intertidal mud, Intertidal sand and muddy sand)
Vegetated shingle	Annual vegetation of drift lines; Perennial vegetation of stony banks; <i>Lathyrus japonicus</i> (sea pea)
Coastal lagoons	Coastal Lagoons
Harbour porpoise	Harbour porpoise

**Table 5. Assessment of likely significant effects alone**

Feature	Relevant pressure	Sensitivity to coastal access proposals	Assessment of risk to site conservation objectives	LSE alone?
Non-Breeding Wetland Bird Assemblage	Disturbance of feeding, resting and birds	Non-breeding birds using the wetland habitat around the Alde/Ore Estuary to nest, rest and feed may be disturbed by	Overwintering birds are present in significant numbers in locations on this part of the stretch so significant effects on this feature group	Yes

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Feature	Relevant pressure	Sensitivity to coastal access proposals	Assessment of risk to site conservation objectives	LSE alone?
		<p>recreational activity.</p> <p>The birds can show a range of responses from being alert to making major flights. Disturbance during the wintering season can lead to extra energy expenditure, interrupted feeding and reduced survival rates.</p>	cannot be ruled out at this stage of the assessment.	
Non-breeding red-throated diver	Disturbance of feeding and resting birds	This species feeds predominantly out at sea on open water. These proposals are unlikely to increase access to these areas.	No appreciable risk. A feature of the Outer Thames Estuary SPA, this diving bird may use the adjacent SPAs on the stretch to feed.	No
Breeding gull Assemblage	Disturbance of feeding, and nesting and breeding birds.	Breeding birds nesting and feeding near the proposed route or within the coastal margin may be disturbed by recreational activity. The birds can show a range of responses from being alert to making major flights. Disturbance during breeding season can lead to direct trampling of eggs and chicks, or	Lesser black-backed gulls and Mediterranean gulls are present and nest along this stretch in significant numbers (though the former have declined considerably in recent years), so significant effects on this feature group cannot be ruled out at this stage of the assessment.	Yes



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<b>Feature</b>	<b>Relevant pressure</b>	<b>Sensitivity to coastal access proposals</b>	<b>Assessment of risk to site conservation objectives</b>	<b>LSE alone?</b>
		disturbance of incubating parents leading to increased mortality through predation or hypothermia/heat.		
Breeding avocets and terns	Disturbance of feeding and nesting birds	The qualifying features in this group are colonial species and nest on shingle beaches and rocky islands, on rivers with shingle bars, and at inland gravel pits and reservoirs. Nesting birds are particularly vulnerable to disturbance as a result of recreational activities (including walking and walking with a dog) which can lead to direct trampling of eggs and chicks, or disturbance of incubating parents leading to increased mortality through predation or hypothermia/heat.	Avocet and little tern nesting sites are known along this stretch of the England Coast Path, so significant effects on this feature group cannot be ruled out at this stage of the assessment.	Yes
Breeding marsh harrier	Disturbance of feeding and nesting birds	The birds can show a range of responses from being alert to making major	This species is known to nest along this stretch of the England Coast Path, so significant effects on	Yes



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Feature	Relevant pressure	Sensitivity to coastal access proposals	Assessment of risk to site conservation objectives	LSE alone?
		<p>flights. Disturbance during the breeding season can lead to direct trampling of eggs and chicks, or disturbance of incubating parents leading to increased mortality through predation or hypothermia/heat.</p>	<p>this feature group cannot be ruled out at this stage of the assessment.</p>	
<p>Heathland and ground nesting birds</p>	<p>Disturbance of feeding and nesting birds</p>	<p>Nightjar and woodlark that nest on the ground on heathland near the proposals may be disturbed by recreational activity. The birds can show a range of responses from being alert to making major flights. Disturbance during the breeding season can lead to direct trampling of eggs and chicks, or disturbance of incubating parents leading to increased mortality through predation or hypothermia/heat.</p>	<p>Both woodlark and nightjar are found on the Sandlings SPA, part of which lies seaward of the path at Snape Warren. Significant effects on this heathland ground-nesting bird cannot be ruled out at this stage of the assessment.</p>	<p>Yes</p>



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Feature	Relevant pressure	Sensitivity to coastal access proposals	Assessment of risk to site conservation objectives	LSE alone?
Saltmarsh & Wetland Invertebrates	Trampling: Loss of, or damage to, supporting habitat	A variety of invertebrates may be trampled or have their supporting habitat damaged or destroyed by recreational activity.	No appreciable risk. The wetland invertebrates are restricted to areas of saltmarsh and peatland. These areas are unattractive to walkers and will be subject to a year round exclusion of access (s25A).	No
Woodland Invertebrates	Trampling: Loss of, or damage to, supporting habitat	A variety of invertebrates may be trampled or have their supporting habitat damaged or destroyed by recreational activity.	No appreciable risk. The flies <i>Cheilosia velutina</i> and <i>Empis prodomus</i> are qualifying features for this stretch, both of which are mobile species not susceptible to trampling.  Small parcels of woodland are found within the coastal margin, and near Bawdsey Beach, however the risk of direct and indirect disturbance on the features are considered negligible.	No
Shingle & Tidal Litter Invertebrates	Trampling: Loss of, or damage to, supporting habitat	A variety of invertebrates may be trampled or have their supporting habitat damaged or destroyed by	Shingle Street includes areas of shingle which are to be included within the coastal margin, along with an area of tidal litter present at Gedgrave	Yes



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<b>Feature</b>	<b>Relevant pressure</b>	<b>Sensitivity to coastal access proposals</b>	<b>Assessment of risk to site conservation objectives</b>	<b>LSE alone?</b>
		recreational activity.	Cliffs on the Butley River. This feature will therefore be assessed further.	
Aquatic invertebrates	Trampling: Loss of, or damage to, the features and supporting habitat (eg via dogs entering water)	A variety of invertebrates may be trampled or have their supporting habitat damaged or destroyed by recreational activity.	Brackish/saline lagoons are located along this stretch south of Shingle Street and on Orford Ness. Significant effects on this feature group cannot be ruled out at this stage of the assessment.	Yes
Fresh/brackish Aquatic Plant Assemblage	Trampling: Loss of, or damage to, these plants & their habitat (eg via dogs entering water)	The associated habitats of the qualifying features may be damaged due to trampling.	Brackish/saline lagoons are located along this stretch south of Shingle Street and on Orford Ness. Significant effects on this feature group cannot be ruled out at this stage of the assessment.	Yes
Coastal Plant Assemblage	Trampling of vegetation	Many of these plants such as eelgrass grow in wet areas which are not suitable to align the main path upon. Section 25 year-round access exclusions will prevent access to areas of saltmarsh and flat not suitable for public access.	Some of these coastal plants can grow on firmer ground which would not be considered for an s25A access exclusion, therefore significant effects on this feature group cannot be ruled out at this stage of the assessment.	Yes
Coastal Lagoons	Trampling: Loss of, or damage to,	Trampling of associated species and vegetation	Saline lagoons are present south of Shingle Street and	Yes

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Feature	Relevant pressure	Sensitivity to coastal access proposals	Assessment of risk to site conservation objectives	LSE alone?
	supporting habitat		include the only Suffolk site of <i>Carex extensa</i> sedge and are present on Orford Ness. Significant effects on this feature group cannot be ruled out at this stage of the assessment.	
Intertidal and associated habitat	Trampling: Loss of, or damage to, features and supporting habitat	This habitat could be damaged through trampling.	No appreciable risk. Areas of saltmarsh and flat unsuitable for public access will be covered by year-round S25A access exclusions.	No
Vegetated Shingle	Trampling: Loss of, or damage to, vegetation and supporting habitat	Vegetated shingle can be damaged or destroyed by people walking repeatedly over the same part of it.	Shingle Street and Orford Ness contain areas of this habitat within coastal margin. Significant effects on this feature cannot be ruled out at this stage of the assessment.	Yes
Vegetated Shingle	Loss of supporting and designated habitat through installation of access management infrastructure	The installation of infrastructure associated with these proposals could result in a permanent loss of this habitat type.	Waymarker posts are proposed at Shingle street but these will be installed on the PRoW and therefore will not impact on the vegetated shingle habitats.	No
Harbour porpoise	None identified	Not considered sensitive due to the lack of interaction between path	No appreciable risk. There is no interaction between users of the	No

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Feature	Relevant pressure	Sensitivity to coastal access proposals	Assessment of risk to site conservation objectives	LSE alone?
		users and the feature.	Coast Path and this feature.	
SPA Supporting Habitat	<p>Trampling: Loss of, or damage to, supporting habitat</p> <p>These habitats can provide support for non-breeding birds during foraging activity, moulting, roosting, loafing, etc.</p>	<p>Supporting habitats not covered at low tide could be sensitive to changes in access that lead to increased trampling.</p> <p>Trampling could result in: structural damage, compaction, erosion and loss of or reduction in effectiveness of habitat.</p>	<p>Much of this stretch is aligned along the seawall, with the Alde/Ore Estuary in close proximity and therefore with little seawards coastal margin. Where potential supporting habitat is present the vast majority is unsuitable for public access (and will be covered by an s25A restriction to exclude access) therefore is not considered likely to be at risk from trampling, and the remainder is uninviting to access, not likely to support the above features, in an area where we anticipate negligible use of the coastal margin or a combination of the above.</p>	No
SPA Supporting Habitat	Loss of supporting habitat through installation of access management infrastructure	The installation of infrastructure associated with these proposals could result in a permanent loss of this habitat type.	<p>No appreciable risk. Infrastructure is proposed upon existing walked routes wherever possible (for example Shingle Street and at Snape Warren). Elsewhere infrastructure is proposed along the</p>	No



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Feature	Relevant pressure	Sensitivity to coastal access proposals	Assessment of risk to site conservation objectives	LSE alone?
			seawall features adjacent to, but not part of, the European sites.	
Installation of Infrastructure	Installation works for infrastructure forming part of these proposals may generate noise and visual disturbance.	Bird populations may be disturbed by installation works for infrastructure. Disturbance during the wintering season can lead to extra energy expenditure, interrupted feeding and reduced survival rates.	These proposals include the installation of waymarkers and other infrastructure in close proximity to the European protected sites. These have the potential to disturb bird populations, therefore this potential risk cannot be ruled out at this stage.	Yes

### Conclusion:

The plan or project alone is likely to have a significant effect on the following qualifying features:

- Non-breeding wetland bird assemblage- through disturbance
- Breeding gull assemblage- through disturbance
- Breeding avocets and terns- through disturbance
- Breeding marsh harrier- through disturbance
- Heathland and ground-nesting birds- through disturbance
- Shingle & tidal litter invertebrate habitat- through trampling
- Aquatic invertebrates & habitat- through trampling
- Fresh/brackish aquatic plant assemblage- through trampling
- Coastal plant assemblage- through trampling
- Coastal lagoons – saline lagoon margins- through trampling
- Vegetated shingle- through trampling
- Installation of infrastructure- through disturbance to birds

The plan or project alone is unlikely to have a significant effect on the following qualifying features groups:

- Non-breeding red-throated diver- through disturbance



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- Saltmarsh & wetland invertebrates- through trampling
- Woodland invertebrates- through trampling
- Intertidal habitat- through trampling
- Vegetated shingle- through loss of habitat
- Harbour porpoise
- SPA supporting habitat- through trampling
- SPA supporting habitat- through loss of habitat

### C2.2 Risk of Significant Effects in-combination with the effects from other plans and projects

The need for further assessment of the risk of in-combination effects is considered here.

Natural England considers that it is the appreciable risks of effects (from a proposed plan or project) that are not themselves considered to be significant alone which must be further assessed to determine whether they could have a combined effect significant enough to require an appropriate assessment.

#### Step 1 – Are there any appreciable risks from the access proposals that have been identified in C2.1 as not significant alone?

Further to the risks identified as being significant alone (in C2.1), it is considered that there are no other residual and appreciable risks likely to arise from this project which have the potential to act in-combination with similar risks from other proposed plans or projects to also become significant. It has therefore been excluded, on the basis of objective information, that the project is likely to have a significant effect in-combination with other proposed plans or projects.

#### Conclusion:

**The plan or project, in combination with other plans and projects, is unlikely to have a significant effect on the following qualifying features of the European Site(s):**

- Non-breeding red-throated diver - through disturbance
- Saltmarsh & wetland invertebrates- through trampling
- Woodland invertebrates- through trampling
- Intertidal habitat- through trampling
- Vegetated shingle- through loss of habitat
- Harbour porpoise
- SPA supporting habitat- through trampling
- SPA supporting habitat- through loss of habitat



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### **C3. Overall Screening Decision for the Plan/Project**

On the basis of the details submitted, Natural England has considered the plan or project under Regulation 63(1)(a) of the Habitats Regulations and made an assessment of whether it will have a likely significant effect on a European site, either alone or in combination with other plans and projects.

**In light of sections C1 and C2 of this assessment above, Natural England has concluded:**

As the plan or project is likely to have significant effects (or may have significant effects) on some or all of the Qualifying Features of the European Site(s) 'alone', further appropriate assessment of the project 'alone' is required.



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## PART D: Appropriate Assessment and Conclusions on Site Integrity

### D1. Scope of Appropriate Assessment

A note on terminology used within this assessment:

- Seawall: Describes the earth banks protecting low-lying land from tidal flooding
- Folding: Describes the strip of level ground adjacent to a seawall on its landward side

In light of the screening decision above in section C3, this section contains the Appropriate Assessment of the implications of the plan or project in view of the Conservation Objectives for the European Site(s) at risk.

The Sites and the Qualifying Feature for which significant effects (whether 'alone' or 'in combination') are likely or cannot be ruled out and which are initially relevant to this appropriate assessment are:

**Table 6: Qualifying Features and Risks to Conservation Objectives**

Environmental pressure	Qualifying Feature(s) affected	Risk to Conservation Objectives
Disturbance to the non-breeding wetland bird assemblage	Black-tailed godwit; Spotted redshank; Greenshank; Greater white-fronted goose; Shelduck; Wigeon; Teal; Pintail; Shoveler; Avocet; Redshank; Ruff	Disturbance to the assemblage, following changes in recreational activities as a result of the access proposal, leads to changes to abundance and diversity.
Disturbance to the breeding gull assemblage	Lesser black-backed gull; Mediterranean gull	Disturbance to nesting and feeding breeding birds, following changes in recreational activities as a result of the access proposal, leads to changes to abundance and diversity.
Disturbance to individual	Avocet; Little tern; Sandwich tern, Common tern; Marsh harrier; Nightjar; Woodlark	Disturbance to nesting and feeding breeding birds, following changes in recreational



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Environmental pressure	Qualifying Feature(s) affected	Risk to Conservation Objectives
breeding bird species		activities as a result of the access proposal, leads to changes to abundance and diversity.
Loss of coastal plant assemblages through trampling	<i>Zostera angustifolia</i> ; <i>Frankenia laevis</i> ; <i>Lepidium latifolium</i> ; <i>Parapholis incurva</i> ; <i>Puccinellia fasciculata</i> ; <i>Sarcocornia perennis</i> ; <i>Vicia lutea</i> ; <i>Trifolium suffocatum</i> ; <i>Medicago minima</i>	The trampling and loss of designated features, following changes in recreational activities as a result of the access proposal leads to the reduction in the extent and distribution of qualifying natural habitats and habitats of the qualifying species.
Loss of vegetated shingle communities through trampling	Annual vegetation of drift lines; Perennial vegetation of stony banks; <i>Lathyrus japonicus</i> (sea pea) and other associated vegetated shingle plants.	The trampling and loss of designated features, following changes in recreational activities as a result of the access proposal leads to the reduction in the extent and distribution of qualifying natural habitats and habitats of the qualifying species.
Loss of aquatic invertebrates through trampling	<i>Nematostella vectensis</i> ; <i>Gammarus insensibilis</i> of saline lagoons; <i>Pseudamnicola confusa</i>	The trampling and loss of designated features, following changes in recreational activities as a result of the access proposal leads to the reduction in the extent and distribution of qualifying natural habitats and habitats of the qualifying species.
Loss of fresh/brackish aquatic plant assemblages through trampling	<i>Althaea officinalis</i> ; <i>Sonchus palustris</i> ; <i>Ruppia cirrhosa</i>	The trampling and loss of designated features, following changes in recreational activities as a result of the access proposal leads to the reduction in the extent and distribution of qualifying natural habitats and habitats of the qualifying species.
Loss of coastal/saline lagoon margin communities through trampling	Saline lagoon margins	The trampling of designated features, following changes in recreational activities as a result of the access proposal, leads to the reduction in the extent and distribution of qualifying natural habitats and habitats of the qualifying species.
Disturbance to birds through the installation of infrastructure	The breeding and non-breeding bird species listed above.	Proposals include the installation of waymarker and advisory/ interpretation signs, steps, gates etc. A screen and platform structure for bird watchers is proposed on the east side of the Butley River.



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### **D2. Contextual statement on the current status, influences, management and condition of the European Site and those qualifying features affected by the plan or project**

Land encompassing the Alde-Ore Estuary, the Butley Estuary and Orford Ness was designated as the Alde-Ore site of Special Scientific Interest (SSSI) in 1985. The following year this area was additionally designated under the Natura 2000 network as a Special Protection Area (SPA) and a Ramsar site due to the nationally and internationally important populations of birds that the area supports.

#### **Disturbance to breeding & non-breeding bird species**

##### **Marsh harrier (Breeding)**

Between 1988 and 2016 the number of breeding pairs of marsh harriers had fluctuated between 0 and 3 [2]. Males can require large breeding ranges depending on the breeding cycle stage. It was therefore thought unlikely that the site would hold more than 2-3 males with 4-5 breeding females [2]. The SSSI assessment completed in 2013 recorded two breeding pairs on Orford Ness Lantern Marshes and one breeding pair on Hazlewood Marshes [3]. In 2018, however, there were 4 nests on Orfordness and 2 on the Upper Butley River [4].

Marsh harriers have also bred on neighbouring sites including Stanny Farm at Iken and at the Hollesley and Boyton Marshes RSPB Reserves. It is likely that the Alde-Ore Estuary SSSI and SPA can't support a much larger population than has recently been recorded, when taking into account individuals outside of the protected area [2].

Breeding marsh harrier are present on the Butley River and they have bred at this location in low numbers in 2014, 2015 and 2016. The SSSI target of at least two breeding pairs was met between 2012 and 2016 [2]. In 2018 two nesting attempts were made in the upper reaches although both nests failed [4].

The Alde-Ore SPA species targets for marsh harrier are to maintain the current breeding population and supporting habitat. Much of the site is sympathetically managed by the Suffolk Wildlife Trust, National Trust and RSPB and as such potential pressures to this species, including from inappropriate pest control and hydrological changes, are minimised. Following the flooding of Lantern Marshes in 2013, on/off site mitigation for marsh harrier is incorporated into the Alde-Ore Estuaries Site Improvement Plan [5].

In a national context, the marsh harrier population has increased significantly since the Alde-Ore SSSI designation. The current UK population is estimated at around 600 pairs, so this SSSI in some years (e.g. 2018) still supports close to 1% of the UK population [6] [2].

##### **Avocet (Breeding and Non-Breeding):**



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Avocet use this site for breeding and overwintering and are present year-round across the SPA. Overwintering birds start to arrive in October having flown from their breeding grounds in mainland Europe, departing in February, and form part of the Western European population [2].

Breeding data for avocet on the Alde-Ore Estuary are available dating back to 1947 (when the species famously re-colonised the UK) and these show fluctuations through time, with a record number of pairs counted in 2000. However since then the numbers have declined. Between 2009 and 2013 the peak mean number of nesting pairs was 46 at Orford Ness and Havergate Island [3] and from 2012-16 the site recorded 40 pairs [2]. At the time of SPA designation in 1986 there were 104 pairs present and an SPA target is for >75% of this starting number of pairs to breed on the site [7]. As the recent counts have been low a 'restore' target is in place across the SPA to increase the number of breeding pairs and reduce disturbance caused by human activity. For comparison, the breeding population of avocet across the whole of the UK increased to 2256 pairs in 2017 (*British Birds Rare Breeding Birds Report 2017*).

The number of avocets recorded on Havergate Island have significantly declined since around 2000, possibly due to an increase in the number of herring gulls and lesser black-backed gulls which also nest at the site [2].

On Orford Ness extensive work has been undertaken to create suitable nesting habitat for avocet, including the creation of scrapes. Systematic predator control was introduced in 2016. This work was aided by EU LIFE project funding which Orford Ness has been awarded three times from 1994-1997, 1997-2000 and 2010-2014. The latter funding aimed to improve water level management on Orford Ness and Havergate Island to maintain and improve the quality of coastal lagoons and marshes.

The December 2013 tidal surge affected much of the coastline, and flooded Lantern Marshes on Orfordness. Whilst the breach here was repaired and the water drained in May 2016 to help restore suitable breeding habitat, this area remains vulnerable to future flooding [2].

This surge also flooded the Hazlewood Marshes on the north bank of the Alde-Ore Estuary, dramatically altering this habitat through the introduction of saltwater. Whilst much of the previous plant and bird assemblages were lost from the site, the new habitat created attracts birds including avocet which bred there in 2016.

The numbers of non-breeding, overwintering avocet on the Alde-Ore Estuary increased between 1992/93 and 2013/14 with a relatively stable population [2]. A peak was recorded in 2010/11 when 1946 individuals were counted across the whole site. The SSSI target is to maintain numbers above 50% of 391 individuals, which was the 5 year mean at the time of designation. The 5 year mean from 2009/10 to 2013/14 was 1604 individuals, greatly exceeding this target figure [2]. The SPA target figure is higher, at least 50% of 766 individuals, although this was also greatly exceeded. This increase corresponds with an increase in the UK wintering population for this species [2].

Foraging is particularly concentrated around Iken, Snape and the Butley River where large flocks of more than 600 birds can be seen in winter [8].



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SPA targets for overwintering avocet include to maintain the current population levels, and to reduce disturbance from humans, and to maintain extent and quality of roosting and feeding sites [3].

### **Lesser black-backed gull (Breeding)**

Lesser black-backed gulls are thought to have started breeding on Orford Ness around 1968 [9], possibly as a result of displacement from a Dutch colony, with their numbers supported by chicken factory and fishery discards, outdoor pigs and landfill sites. The UK trend between 1969/70 to 2002 showed an increase for this species [10]. At the time of Alde-Ore Estuary SPA classification the breeding population of lesser black-backed gull was 14,070 pairs (4 year peak mean 1994-1997, derived from the JNCC seabird monitoring programme) which represented internationally important numbers of this species.

Rapid expansion during the 1990s saw a peak of 23,400 pairs in 2000 across the Alde-Ore Estuary SSSI. Since then numbers have dramatically declined for reasons that are not fully understood [2]. Predation, disturbance and reduced food availability as a result in changes to agricultural practice are all possible factors within this decline. The 5 year peak mean (2011-2015) was 1,940 breeding pairs, [3], rising to 2049 pairs (5 year mean 2012-2016), however this is well below the starting figure of 14,070 pairs so a current SPA target is to restore the breeding population abundance.

Orford Ness is a breeding site for lesser black-backed gulls although historically their nesting range across this site was greater, prior to public access in 1995 [2]. Other factors including fox predation and the higher success rate of nesting attempts on rooftops may have contributed to this decrease in range size. In recent years their numbers have fluctuated, with 91 pairs recorded in 2016, 239 recorded in 2017 and 91 recorded in 2018 (raising 15 chicks) [4]. The distal end (the Point) has supported nesting sites for this species although here they are vulnerable to disturbance. The Pagoda and Cobra Mist building roofs provide nesting territory protected from ground predators. The Lantern Marshes on Orford Ness have provided an important breeding site since the 1990s, however this site flooded during the December 2013 tidal surge.

Havergate Island is increasingly being favoured as a nesting site for this species where predator control is in place. Hollesley Marshes RSPB reserve has also recorded some breeding pairs with 4 pairs in 2015 and 19 pairs in 2016 [2].

SPA targets for this feature include the reduction of disturbance from human activity and through predation, and the maintenance of the extent of habitat suitable for nesting, ie grassland swards of 20cm to 60cm in height.

### **Sandwich tern (Breeding)**

Sandwich terns are a summer visitor and begin to arrive in Suffolk towards the end of March. A tendency for movement between colonies can result in wide fluctuations in breeding pairs at a given location [2]. At the time of classification there were 170 breeding pairs across the SPA (SPA supplementary advice).



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Sandwich terns had been recorded nesting on Havergate Island since 1951 with aggregations of up to 100 individuals [2]. However this colony disappeared in 1997 and since then has only nested in some years with a maximum of 15 pairs in 2003 (SPA supplementary advice). Likely part of the same biogeographic population, this species has nested at the RSPB Minsmere Nature Reserve to the north in recent years [11].

The SPA is not meeting its population target of >75% of 170 pairs and therefore a restore target is in place to increase the breeding population numbers.

Foxes, brown rats and lesser black-backed gulls all present predation risks to the eggs of this species. The Alde-Ore Estuaries Site Improvement Plan (SIP) covers the Alde-Ore SPA, the Alde-Ore and Butley Estuaries SAC and Orford Ness-Shingle Street SAC. An action is to investigate any downward trends in breeding numbers of Sandwich tern using SPA including habitat decline, predation, disturbance, regional/wider trends, etc and implement suitable mitigation (action 6H, [5]).

The current UK breeding population was estimated at 12500 pairs (1998-2002, Seabird 2000, JNCC), a 15% decline nationally since the Seabird Colony Register 1985-88 [12], [2].

### **Little tern (Breeding)**

The current UK breeding population is estimated at 1900 pairs (1998-2002, Seabird 2000, JNCC), a 23% decline nationally since the Seabird Colony Register 1985-88 [13] [2].

Little terns arrive in Suffolk from their wintering grounds in West Africa at the start of May in search of suitable shingle nesting sites. 48 pairs of breeding little tern were recorded at the time of site classification and the SPA target is to maintain the breeding population of >75% of this figure. However there has been a dramatic decline in little terns across the whole SPA since 1988 [2]. The five year mean from 2012-2016 was just 1 pair. In 2013 4 pairs nested but none fledged any chicks (SPA supplementary advice).

In 2013 40 birds were briefly recorded on Shingle Street after disturbance to the breeding colony on the Deben Estuary SPA [14]. There is no longer a colony of regular breeding birds although they do roost on the shingle ridges at Shingle Street, Orford Ness and Havergate Island [2].

Within the Alde-Ore Site Improvement Plan, investigating the cause of decline and mitigating the recent breeding failure within the little tern populations are identified as actions, through active management of suitable nesting habitat at Orfordness, Shingle Street and possibly Havergate for benefit of Little terns through fencing, wardening, etc (Actions 6E and 6F, [5]).

The marine and coastal Outer Thames SPA has a target to maintain its current population of 746 breeding individuals [15].

### **Common tern (Breeding)**



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Common terns breed in similar sand and shingle habitats to little terns although have a wider foraging range. They are common summer visitors to the Suffolk coastline and they are a designated feature of the Outer Thames Estuary SPA, a predominantly marine SPA extending into the North Sea. The supplementary advice target for this species is to maintain the current breeding populations at 532 individuals [15].

### Woodlark and Nightjar (Breeding)

These features are designated as part of the Sandlings SPA. This site covers approximately 3,390 hectares, the majority of which lies landward of the path alignment, at a distance whereby no adverse effects are considered likely. Snape Warren Open Access land is part of this SPA and lies within the coastal margin therefore is considered here.

The latest count data used at the time of the SPA designation in 2001 were 109 breeding male nightjars (3.2% of the GB population) and 154 breeding pairs of woodlark (10.3% of the GB population) across the whole Sandlings SPA site [16]. Both species have a 'restore' SPA target to increase their levels to these initially recorded. However, a new target for woodlark is being modelled as the effects of a 1987 gale prior to designation which fell areas of trees and created unusually large area of optimal habitat, perhaps generating a peak in ground-nesting woodlark numbers.

Snape Warren is Open Access land managed by the RSPB. Nightjar and woodlark appear on their 'star species' list [17] on the visitor webpages and the habitat is actively managed. The last Snape Warren SSSI assessment in 2013 gave this area 'unfavourable recovering' status due to bracken and birch scrub however stated the management plan in place would tackle these issues.

Woodlark are a priority species. A national survey in 2006 recorded a maximum of 370 breeding pairs in Suffolk (21% of the UK population). The Suffolk Sandlings contained about 16% of the national total. In 2007 the Suffolk Biodiversity Information Service's species Action Plan stated that about 90% breed on the Suffolk heathlands and therefore continued habitat maintenance is key to maintaining population numbers [18].

### Mediterranean gull (Breeding)

Nationally, Mediterranean gull numbers have increased from around 100 pairs (JNCC Seabird 2000 census) up to 600-700 nesting pairs by 2010, and c.1400 pairs by 2017 (inc. 35 in Suffolk) [19] mostly on the south and south-east coasts of England [20]. This is part of an international range expansion which has taken place over the last 50 years.

These gulls are designated under the Alde-Ore Estuary Ramsar site and therefore SPA supplementary advice targets are not available for this species.

### Ruff (Non-Breeding)

Non-breeding aggregations of ruff are a qualifying feature of the Alde-Ore Estuaries SPA. The UK is at the northern limit of this species' overwintering range and southern limit of its breeding range,



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therefore numbers peak during the spring and autumn migration periods as passage migrants pass through, dependent on food availability and weather conditions [2]. Ruff are a reportable feature of Unit 7 of the Alde-Ore Estuary SSSI – Hazlewood Marshes and are also found in a number of other units.

Numbers on the Alde-Ore Estuary have been low in recent years, with no significant trends. Over the ten years to 2013/14 numbers regularly fell below 10 [2]. The Wetland Bird Survey (WeBS) gives a figure of 13 non-breeding ruff as the 5 year peak mean from 1989/90 - 1993/94, and from 2009/10 to 2013/14 this figure was 6 individuals [3].

A restore target has been set for the population based on the earlier WeBS figure of 13 birds.

### Redshank (Non-Breeding)

The common redshank *Tringa totanus* is a feature of the Alde-Ore Estuary SPA. The SPA target is to maintain the wintering population above 50% of 1162 individuals, the 5 year mean recorded at the time of designation.

With a five year mean of 2,352 (2013/14 to 2017/18) the SPA target is currently being met (WeBS online data). The number of birds in the estuary vary greatly depending on weather conditions, with fewer present during cold snaps [2].

The UK population of overwintering redshank between 2017/18 is estimated at 94,000, down from 112,000 in 2011 [21]. The WeBS 25-year trend (1991/92 to 2016/17) is -15%, however since 2011/12 there has been a small increase in numbers [21].

### Non-breeding Wetland Bird Assemblage (Alde-Ore Ramsar)

The following species are named features within the Alde-Ore Ramsar which are present at levels of international importance with peak counts during the spring and autumn (ie non-breeding): black tailed godwit, spotted redshank and greenshank. In addition the following species have peak counts during the winter: greater white-fronted goose, shelduck, wigeon, teal, pintail, and shoveler.

#### Black-tailed godwit

The Alde-Ore Estuary Ramsar designation recorded 283 individuals, representing an average of 1.8% of the Great Britain (GB) population at that time (5 year peak mean 1998/9 - 2002/3) [22].

Across the UK, the 25 year trend for this species (1991/92 to 2016/17) records a decrease in numbers however the 10 year trend (2006/7 to 2016/17) records a more recent increase [21] with an estimate of 39,000 overwintering individuals across Great Britain in 2017/18 [21].

#### Spotted redshank

The Alde-Ore Estuary Ramsar designation recorded 44 individuals, representing an exceptional average of 32.3% of the GB population (5 year peak mean 1998/9 - 2002/3).



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During the 17/18 overwintering period there were an estimated 67 spotted redshank present in Great Britain [21] and between 2013/14 and 2017/18 the 5 year average for the Alde Estuary was 1 individual (WeBS online data).

### **Greenshank**

The Alde-Ore Estuary Ramsar designation recorded 29 individuals, representing an average of 4.8% of the GB population (5 year peak mean 1998/9 - 2002/3) [22]. Across GB there were an estimate of 810 birds present overwinter in 2013 [21].

### **Greater white-fronted goose**

The Alde-Ore Estuary Ramsar designation recorded 186 individuals, representing an average of 3.2% of the GB population (5 year peak mean for 1996/7 - 2000/01).

Across Great Britain the 25 year trend (1991/92 – 2016/17) has shown a decrease in this species population numbers [21].

Although not a qualifying feature of the Alde-Ore Estuary SPA, WeBS have issued short and medium term alerts due to decreases of 81% and 39% respectively (short term – 5 years, medium term- 10 years).

A principal site for this species is at North Warren just north of this stretch. On the stretch, the Aldeburgh Marshes are an important site and 50 were observed to fly north from this location in January 2018. Boyton and Hollesley Marshes recorded 20 geese each in January 2018, and these birds returned in the second winter period of that year with 9 at Hollesley and 11 at Boyton Marshes.

### **Shelduck**

Between 1992/93 and 2013/14 the numbers of overwintering Shelduck at the Alde-Ore Estuary site remained stable, remaining consistently around 1000 individuals [2].

The Alde-Ore Ramsar information sheet records 1398 individuals, representing an average of 1.7% of the GB population (5 year peak mean 1998/9 - 2002/3).

Across the UK 25-year trend (1991/92 – 2016/17) has shown a decrease in population numbers of 32%. However, an upturn in the trend since the 2013/14 winter may indicate a reversal in that trend. 47,000 individuals were estimated to be present overwinter in 2017/18 across Great Britain [21].

A long-term WeBS alert for shelduck has been issued for the Alde-Ore Estuary SSSI site, due to a decrease of 25% in the long term (up to 25 years). Shelduck are reportable SSSI features at Gedgrave cliffs unit 38, the Alde-Ore Estuary in the Alde Mudflats Nature Reserve, and on Orford Ness and Havergate Island.

During 2018 the WeBS counts may indicate signs of recovering winter populations after five consecutive poor years. The year's highest count, or 1123 on the Alde-Ore Estuary in February, equals last year's peak count at this site (which was the highest for ten years) [4].





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### **Wigeon**

The Alde-Ore Ramsar information sheet records 6851 individuals, representing an average of 1.6% of the GB population (5 year peak mean 1998/9 - 2002/3).

The Wigeon present in the UK during the winter are derived largely from breeding birds from Iceland, Scandinavia and Russia [2].

Between 1992/93 and 2013/14 the population of overwintering Wigeon fluctuated more widely year to year than any other species assessed on the Alde-Ore Estuary. Overall the population is stable with the population trend showing a slight increase [2].

The winter estimate across Great Britain was 450,000 birds in 2017/18 with an overall increase of 23% in the 25-year trend (1991/92 – 2016/17) [21].

High WeBS counts were recorded during 2016 and 2017, returning to more typical counts in 2018. Counts were made at Orford Ness, Havergate Island and Boyton & Hollesley Marshes [4].

### **Teal**

The Alde-Ore Ramsar information sheet records 2447 individuals, representing an average of 1.2% of the GB population (5 year peak mean 1998/9-2002/3).

The birds present in the UK during the winter are derived largely from breeding birds from Iceland, Scandinavia, the near continent and north-west Russia [2].

Between 1992/93 and 2013/14 the population of overwintering teal on the Alde-Ore Estuary SPA has shown a steady increase [2]. This reflects the UK 25 year trend, which has shown an increase of 38% (trend 1991/92 – 2016/17) [21].

During early 2018 numbers of this species recorded within Suffolk were below the average of recent years, but were much improved by the late winter months (ie the second winter period of 2018). 340 birds were counted on Aldeburgh Marshes in September 2018 [4].

### **Pintail**

The Alde-Ore Ramsar information sheet records 556 individuals, representing an average of 1.9% of the GB population (5 year peak mean 1998/9 - 2002/3).

Across the UK this species has shown a decrease in numbers by 25% (25-year trend (1991/92 – 2016/17) [21].

Although not a qualifying feature of the Alde-Ore SPA, a WeBS alert for pintail has been issued as numbers have dropped by 32% in the medium term (last ten years).

2016 recorded low numbers of this species across Suffolk, with numbers improving in 2017 and a count of 230 on the Alde/Ore Estuary in January 2018 is the highest across this large site since 2015 [4]. A pair was present at Hollesley Marshes into late June although with no proof of breeding. A



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female and duckling were seen at Minsmere in 2018 confirming breeding in the county for the second time in three years and the fourth time since 1951 [4].

### Shoveler

The Alde-Ore Ramsar information sheet records 224 individuals, representing an average of 1.5% of the GB population (5 year peak mean 1998/9 - 2002/3).

Across the UK this species has shown an increase of 76% (25-year trend (1991/92 – 2016/17) [21]. With 19,000 birds estimated to be present in Great Britain during the winter of 2017/18.

During the 2018 season WeBS counts of 400 at the Alde-Ore Estuary in January helped maintain the non-breeding population at record levels [4]. A monthly maxima of 106 were counted on Orford Ness in January 2018, 4 on Boyton Marshes and 26 on Hollesley Marshes [4].

### Trampling - Coastal Plant Assemblage

Coastal plant species including the eelgrass *Zostera angustifolia* inhabits estuarine muds below the mid-tide line. Where these muddy habitats are unsuitable for public access they are covered by an s25A access exclusion year round. The majority of the route alignment is on existing public rights of way, or existing walked routes which will minimise the risks to these coastal plant assemblages.

### Trampling - Vegetated Shingle

Vegetated shingle is a qualifying feature of the Orfordness-Shingle Street SAC. This is a delicate habitat and very sensitive to recreational disturbance. Trampling destroys plants and also adversely disrupts the shingle structure that allow the plants to grow.

“Orfordness is an extensive shingle spit some 15 km in length and is one of two sites representing Annual vegetation of drift lines on the east coast of England. In contrast to Minsmere to Walberswick Heaths and Marshes, drift-line vegetation occurs on the sheltered, western side of the spit, at the transition from shingle to saltmarsh, as well as on the exposed eastern coast. The drift-line community is widespread on the site and comprises sea beet *Beta vulgaris* ssp. *maritima* and *orache Atriplex* spp. in a strip 2-5 m wide” (JNCC, [23]).

The southern end of Orford Ness spit has a fine series of undisturbed ridges showing zonation of plant communities. Pioneer communities including sea pea *Lathyrus japonicus* and false oat-grass *Arrhenatherum elatius* grassland occur. Locally these are nutrient-enriched by the presence of a gull colony; elsewhere they support rich lichen communities. The northern part of Orford Ness has suffered considerable damage from defence-related activities but a restoration programme for the shingle vegetation is underway [23].

### Trampling - Saline Lagoon Margins

A series of percolation lagoons are present at Shingle Street which have developed in the shingle bank adjacent to the shore at the mouth of the Ore estuary. The salinity of the lagoons is maintained



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by percolation through the shingle, although at high tides sea water can overtop the shingle bank. The fauna of these lagoons includes typical lagoon species, such as the cockle *Cerastoderma glaucum*, the ostracod *Cyprideis torosa* and the gastropods *Littorina saxatilis tenebrosa* and *Hydrobia ventrosa*. The nationally rare starlet sea anemone *Nematostella vectensis* is also found at the site [23].

### Disturbance to birds through the installation of infrastructure

The majority of the new, updated or replaced infrastructure on this stretch will be immediately adjacent to the European protected sites, although not within them. Much of the stretch is aligned along existing PRowS.

Exceptions are found at the north west of the Butley River where scrub clearance and the installation of two waymarker signs are proposed. Some signage and an advisory board is proposed on the north east of the Butley River on an existing PRow.

The alternative route on the east of the Butley Estuary includes the installation of steps down from the seawall, signage and new or replacement gates. The proposals include the installation of a bird hide on the alternative route and therefore set back from the water's edge.

### Existing Management Strategies Relevant to the Stretch

#### Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB)

The AONB was designated in 1970 and its statutory purpose is to conserve and enhance the area's natural beauty [24]. This AONB covers 155 square miles/403 square kilometres and has a population of around 23,500. The number of day visitors to the AONB is estimated to be around 3 million per annum [25].

Objectives to 2023 include:

- Adopting an 'Attract and Disperse' approach to encourage wider use of the area where there is capacity for visitors.
- The development of unique packages for wildlife enthusiasts and encourage the use of trails through interpretation and stories.

#### Touching the Tide Project

Touching the Tide was a Landscape Partnership Scheme along the Suffolk Heritage Coast, led by the Suffolk Coast and Heaths AONB and hosted by Suffolk County Council. Landscape Partnership Scheme, 90% funded by the Heritage Lottery Fund. In total Touching the Tide had a budget of about £900,000 over three years for 33 different projects with c.90% of funding by the Heritage Lottery Fund and a core project team of three staff.

#### The Recreational Disturbance Avoidance & Mitigation Strategy (RAMS)



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The RAMS strategy for the area [26] is a “means by which sustainable housing growth can be delivered whilst adequately protecting European wildlife sites from harm that could otherwise potentially occur because of increased recreation pressure arising from the new housing growth”. “The Suffolk Coast RAMS provides a strategic and streamlined approach to mitigation measures, enabling development within the Zone of Influence” [27].

### The Alde and Ore Estuary Partnership

“The Alde and Ore Estuary Partnership (AOEP) was formed in 2012 following the 2009 Alde and Ore Futures Project that demonstrated a strong community view that the current shape of the estuary should be maintained for as long as was feasible and practical” [28]. This group coordinates the approach for upgrading and maintaining flood defences within this estuary and has set up The Alde and Ore Estuary Trust to help raise project funds.

This partnership has produced The Estuary Plan which outlines a plan for the future management of the river defences including proposals to upgrade the seawalls.

### Suffolk Wader Strategy

Established in 2015, this group is a partnership of conservation NGOs, government bodies (including Natural England) and the private sector. Their vision is to protect breeding waders in the area to enable numbers of nationally important species including redshank, lapwing and avocet to increase [29]. Orford Ness, Stanny House Farm and Hollesley Marshes are key sites.

### The EU LIFE Projects: The Alde–Ore Estuary - Securing a sustainable future for wildlife

The area including Orford Ness has been awarded three rounds of EU LIFE project funding, in 1994-1997, 1997-2000 and 2010-2014.

The most recent funding was award jointly to the National Trust and the RSPB for the following project: The Alde–Ore Estuary - Securing a sustainable future for wildlife (LIFE08 NAT/UK/000199) which ran from April 2010 to March 2014. This project aimed, amongst other objectives, to further improve the management of Orford Ness and Havergate Island for habitats and birds of conservational interest. Target species included redshank, sandwich tern and avocet. Habitats included vegetated shingle and coastal lagoons, the improved management of which helps prevent them from drying out during the summer [30]. An After LIFE Conservation Plan was drawn up in 2014 to outline areas for continuing focus over the 5-10 years following the project [31].

### The BALANCE Project

This project concluded in December 2013 and included improvements to the Suffolk Coast Path, a visitor and tourism strategy for the area, 55 information boards and explorer guides for the AONB [32]. This project was part funded by the European Regional Development Fund (ERDF).



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### The LIFE Little Tern Project

This five year project ran from 2013 to 2018, with a six month extension to March 2019, and was funded through the EU LIFE Nature programme and the Suffolk Coast and Heaths AONB's 'Touching the Tide' project. This project aimed to improve the conservation status of the little tern in the UK through targeted action at the most important colonies.

Productivity improved in two thirds of the sites coming under LIFE project management across England and Wales (considering raw data) and that the LIFE Project results indicate a slowing in the population decline. As little terns are long-lived seabirds any improved productivity enables populations to slowly recover in the future if management measures are maintained [33].

All of the nesting little terns recorded in 2018 under this project were recorded at Kessingland, north of this stretch. In 2019 little terns also bred on the south Scrape in the RSPB Minsmere Nature Reserve. Orford Ness is mentioned within the annual report as having had 'little terns nesting there in the past' [33].

### **D3. Assessment of potential adverse effects considering the plan or project 'alone'**

This section considers the risks identified at the screening stage in section C and assesses whether adverse effects arising from these risks can be ruled out, having regard to the detailed design of proposals for coastal access.

In reviewing the ability of any incorporated measures to avoid harmful effects, Natural England has considered their likely effectiveness, reliability, timeliness, certainty and duration over the full lifetime of the plan or project. A precautionary view has been taken where there is doubt or uncertainty regarding these measures.

#### **D3.1 Design of the access proposal to address possible risks – at a stretch level**

In this section of the assessment we describe the key issues and pressures within the communities living along this stretch, partly with reference to the emerging Suffolk Coastal Local plan. Using this contextual background increases the confidence with which we can assess the potential impacts and risks from our proposals. We describe our stretch-wide approach to the key nature conservation issues for this area which include non-breeding bird populations and their supporting habitats.

The Suffolk Coastal Local Plan covers the length of this stretch of the Coast Path. It describes the area as "a uniquely attractive place to live and work, combining a strong economy with a natural and built environment second to none". This plan outlines the aim to balance ambitions for housing developments to address increasing demand alongside the protection of the precious, yet



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sometimes vulnerable, environment. This Plan sets a housing requirement of 582 dwellings per annum over the period 2018 – 2036 (10,476 in total), which are detailed further in local neighbourhood plans.

The HRA conducted for the Suffolk Coastal Local Plan has informed the Recreational disturbance Avoidance Mitigation Strategy (RAMS) [26]. This strategy has been created to provide suitable mitigation for residential growth identified within the existing local plans. Developers' contributions to the RAMS fund for projects within 13km of the protected sites allows the Appropriate Assessment for smaller developments (up to 50 dwellings) to conclude that their in-combination effect will be mitigated. Larger developments (over 50 dwellings and/or in complex cases) may require additional Suitable Alternative Natural Greenspaces (SANGs). Developments within 200m of a European site will be required to undertake an HRA to assess potential effects from factors such as noise and lighting.

The RAMS sets out a package of measures to positively influence visitor behaviour and mitigate potential effects to European sites. These include a team of wardens/rangers, an audit of car parking in the area, the Suffolk Coast and Heaths Dog Project and improvement to signage to raise public awareness of the sensitive wildlife.

Our objective in designing proposals for coastal access has been to ensure they do not increase the disturbance pressure affecting the site and that where possible they contribute towards efforts to manage existing and future demand for places for coastal recreation in ways that help to reduce disturbance to designated features. To achieve this between Bawdsey and Aldeburgh, our proposals for coastal access:

- Make use of popular established paths (where these meet the key principles of alignment in line with the Coastal Access Approved scheme), for example aligning along stretches of the Suffolk Coast Path.
- Do not create new coastal access rights over intertidal mudflats and saltmarsh which provide supporting habitat for the bird and wildlife interests at the site. In practice, use of such intertidal areas for recreation is limited since they are unattractive, dangerous and inherently unsuitable for public access. Maps showing the extent of excluded areas can be found within the Coastal Access Overview Report (a link to the webpage containing this report is found within section i) introduction above).
- Contribute to raising awareness and encouraging appropriate visitor behaviour in areas of environmental importance by installing new information panels at key points along the stretch. These will reinforce messages resulting from the existing RAMS project and display information about the sensitive features.

The project team see an opportunity to influence both existing and new path users in a positive way by explaining the importance of the area for wildlife, the risk of disturbance and how to avoid it.

Where new access has been proposed particular care has been taken to minimise disturbance, through the consideration of alternative routes to mitigate against seasonal disturbance impacts.



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Establishment works to make the trail fit for use, including any special measures that have been identified as necessary to protect the environment, will be carried out before the new public rights come into force on this stretch. Details of the works to be carried out and the estimated cost are provided in the access proposals. Works on the ground to implement the proposals will be subject to any further necessary consents being obtained, including to undertake operations on a SSSI. Natural England will provide further advice to the local authority carrying out the work as necessary.

Subject to these mitigation measures and those outlined in the table below, it is not considered that the installation of infrastructure will have an impact on the qualifying features within the European protected sites.

**Table 7 Establishment Works – Mitigation Measures**

Establishment Factor	Mitigation Measures
Timing of works	<ul style="list-style-type: none"> <li>• Local authority to plan schedule with natural England to limit disturbance risk.</li> <li>• Natural England to specify a period of low sensitivity at each construction site, based on likely departure and arrival dates of waterbird species that use it.</li> <li>• At all other times, operator to work within 200 metres of, and visible to, a roost site will stop during the 2 hours before and after high tide.</li> <li>• Operator to limit construction activities to daylight hours at all times</li> <li>• Should there be an extended period of cold weather with temperatures below freezing for 14 days works will cease</li> </ul>
Site design	<ul style="list-style-type: none"> <li>• Operator to design access routes, storage areas and site facilities to minimise disturbance impacts.</li> <li>• Operator to conduct operations out of sight of roosting and feeding areas for birds where possible.</li> </ul>
Method	<ul style="list-style-type: none"> <li>• Operator to use hand tools where practicable.</li> <li>• Operator to avoid use of machinery working within 200 metres of, and visible to, roost sites during the 2 hours before and after high tide whenever possible.</li> </ul>

## D3.2 Design of the access proposal to address possible risks – at a local level

In this part of the assessment we consider key locations along the coast between Bawdsey and Aldeburgh where establishing the England Coast Path and associated coastal access rights might impact on qualifying Features of a European site. We explain how the detailed design of our proposals at these locations takes account of possible risks.

The relationship between the locations referred to in this assessment and the corresponding Coastal Access Reports in which the access proposal is described is shown in the table below.

**Table 8. Summary of Qualifying Features at Key Sites**

Location	Risk through Disturbance					Risk through Trampling					
	Non-Breeding Wetland Bird Assemblage	Breeding Gull Assemblage	Breeding Avocets and Terns	Breeding Marsh Harrier	Breeding Heathland Birds	Coastal Plant Assemblage	Vegetated Shingle Plant Assemblage	Shingle & Tidal Litter Invertebrates	Aquatic Invertebrates	Fresh/brackish Aquatic Plant Assemblage	Coastal Lagoons
Shingle Street	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓
Hollesley and Boyton Marshes	✓	✓	✓	✓							
Butley River	✓	✓	✓	✓		✓		✓			





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Location	Risk through Disturbance					Risk through Trampling					
	Non-Breeding Wetland Bird Assemblage	Breeding Gull Assemblage	Breeding Avocets and Terns	Breeding Marsh Harrier	Breeding Heathland Birds	Coastal Plant Assemblage	Vegetated Shingle Plant Assemblage	Shingle & Tidal Litter Invertebrates	Aquatic Invertebrates	Fresh/brackish Aquatic Plant Assemblage	Coastal Lagoons
Gedgrave Marshes to the River Ore	✓	✓	✓	✓		✓		✓			
Iken Marshes & Iken Cliffs	✓	✓	✓	✓		✓		✓			
Snape Maltings	✓	✓	✓	✓		✓		✓			
Snape Warren					✓						
Hazlewood Marshes	✓	✓	✓	✓		✓		✓			
Aldeburgh Marshes	✓	✓	✓	✓		✓		✓			
Orfordness	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓
Havergate Island	✓	✓	✓	✓				✓			



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### D3.2A Shingle Street

This key site covers the trail sections that run parallel to European designated sites along the coast, from approximately adjacent to East Lane Car Park northwards past Shingle Street and up to Barthorp's Creek.

#### Current Situation

##### Access Baseline

Shingle Street contains 29 dwellings and approximately sixty inhabitants which draws day visitors and provides accommodation for holidaymakers [34]. The area is known for its remote, wild location 12 miles east of Ipswich and forms part of rich military history of the area, having been evacuated in 1940 in anticipation of an invasion. In recent years the area has been used as a film set for the BBC drama 'The Child in Time' (2017), the film 'Yesterday' directed by Danny Boyle (2019) and the Netflix production of 'The Dig' (2020).

The Shingle Street shell line is a continual line of approximately 20,000 white whelk shells stretching across the shingle. This was begun in 2005 by two friends who had both been through a period of serious illness. This has now become an important local feature of the area [35].

The England Coast Path proposals for the area are to use the existing PRoW from the south into Shingle Street. This forms part of the Suffolk Coast Path. Due to the remoteness of the area current levels of use are low.

Within Shingle Street the Coast Path proposes to align seawards of the dwellings along the existing PRoW. Restricted parking and an absence of nearby facilities means that current levels of access are relatively low most of the year although this can rise to medium during peak tourist season.

Northwards the route aligns along well walked routes, mostly on a PRoW, where levels of use are regular but low towards Barthorp's Creek.

##### Environmental Baseline

The vegetated shingle at Shingle Street was assessed in 2013 as being in 'unfavourable, no change' condition due to failing targets on species composition and recreational pressures being unresolved (NE SSSI Unit 33 assessment). The presence of the seawall to the north and south of Shingle Street does not allow natural roll-back of shingle, thus resulting in coastal squeeze. Further north there is more room for natural roll-back and accretion of sediment is taking place [36].

Some areas are becoming devoid of vegetated substrate as a result of human activities such as angling, walking and recreational use of the beach. Areas around the East Lane car park to the south of Shingle Street are heavily trampled, with very little lichen type shingle although bigger plants are growing vigorously [36].



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The 'Touching the Tide' community based project for the Suffolk Coast and Heaths AONB made an assessment of the vegetated shingle at Shingle Street in 2018 and compared these data to previous surveys [37]. Across the shingle typical communities included SD1 (*Rumex crispus* – *Glaucium flavum*) and *Lathyrus japonicus* sub-communities. *Arrhenatherum elatius* – *Silene uniflora* communities were recorded further from the seaward edge.

The area of vegetated shingle habitat had grown at a rate of approximately 0.3 to 0.4 hectares per year since 2010, totalling 15.9 hectares by 2018.

The effects of trampling around the two small car parks at either end of Shingle Street were noted. Access impacts appear to be concentrated along the two routes from the car parks to the sea and along the high tide mark, with low access across the mature shingle considered likely due to a lack of litter. There was noticeable reduction in the vegetation along the local feature of the shell line [37].

Signage advises walkers about the ground nesting birds, although visitors tend to fan out over a wide area of the shingle. Signage in 2018 read "there are nesting birds on the beaches and marshes. Please keep your dog under control during the nesting season 1<sup>st</sup> May to 31<sup>st</sup> September".

Little tern have bred at Shingle Street, in 2013 about 40 birds were briefly recorded here after disturbance of the Deben Estuary SPA [2]. There is no longer a regular colony of breeding birds although they can be seen roosting on the shingle ridges at Shingle Street, Orford Ness and Havergate Island.

Sandwich terns are a reportable feature of the SSSI unit which covers Shingle Street (Alde-Ore SSSI Unit 33) [36] and the shingle provides suitable habitat for this species [2]. However important breeding records for this species have been recorded from other locations in this area, such as Havergate Island.

The lagoons south of Shingle Street have been used by breeding avocet although they are not currently a reportable feature of the relevant SSSI unit 33 [36] and the area is subject to local disturbance from humans, dogs and foxes [38]. None were noted during the 2018 breeding season [4] although in 2017 three pairs nested and fledged a single chick [39]. In 2016 one pair hatched two chicks although these were both killed by a dog [40]. In July 2016 a birdwatcher posted online that the avocets had bred in the lagoons, which was "amazing given the wet weather and the constant disturbance from walkers and their dogs" [41]. In 2015 two pairs fledged at least two young at the pools south of Shingle Street [38].

These lagoons have formed as a result of the dynamic coastal processes, with local morphology the result of convergence of sediment transported from the north and periodically from the south [42]. It is reported that following a breach of Orford Ness in 1893 the isolated section of this spit formed a series of islands and banks, which were transported via wave action onto the Shingle Street frontage to form a series of lagoons. These are partially preserved today [42].

Natural processes are now constrained to the south of Shingle Street by the presence of sea defences including a rock revetment which aim to slow erosion rates [42].



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The lagoons have supported several unusual anemones and invertebrates and vegetation communities including spiral tassel-weed. The only colony in Suffolk of the rare extended sedge *Carex extensa* grows round the northern lagoons [34]. The 'coastal lagoon' SSSI feature and 'vascular plant SSSI' feature were both assessed as in unfavourable condition in 2013 (Alde-Ore SSSI, Unit 33) and the unit as a whole was assessed as 'unfavourable no change'.

Inland of the path proposals the land is comprised of coastal and floodplain grazing marsh. Brackish channels support feeding and nesting birds, and the single freshwater channel has recorded otters [34]. Coastal saltmarsh pools within Barthorp's Creek support a variety of invertebrates and the mudflats at its mouth provide feeding habitat for birds [34].

### Detailed design and assessment of risk

Current access levels along the Suffolk Coast Path northwards from East Lane are quite low, increasing locally at Shingle Street to medium levels in summer.

The area is remote with a lack of parking (other than at Shingle Street itself) and other facilities. It is a well-known local beach location although historic and cultural factors support much of the tourist interest which is unlikely to be affected by the establishment of the England Coast Path (which does not create any new access in this area and follows existing walked routes). Therefore we anticipate that these Coast Path proposals will result in a medium relative increase to the trail in this area.

Due to the existing use of the beach we anticipate a negligible increase in the use of the coastal margin as a result of the Coast Path's establishment. The lack of facilities may encourage walkers to continue their journeys away from the area.

### Consideration of possible risks to qualifying features at this location in light of the access proposal

#### Disturbance to the Non-Breeding Wetland Bird Assemblage

At this location the Coast Path is aligning on an existing PRoW or existing walked routes and Coastal Access rights are not applicable to the wetland areas inland of the path. The coastal margin is predominantly comprised of shingle habitats unsuitable for these wetland birds, with the exception of coastal and floodplain grazing marsh south of the Martello tower at Shingle Street. This area does not fall within a European protected site although may provide supporting habitat for birds and wildlife. At this location the Coast Path aligns on existing access and signage informs visitors of the sensitive nature of the area (and advises visitors to keep their dogs under control during the breeding season to protect ground-nesting birds.)

Due to existing access and the anticipated small relative increase of use of the trail at this location, and a lack of attractors seawards of the path, we do not conclude there is a risk to non-breeding wetland birds in this area. Pools adjacent to East Lane car park are not covered by Coastal Access rights.



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Areas of saltmarsh are present within Barthorp's Creek, where the Coast Path proposals are to align on the PRoW around this area. This area is unsuitable for public access therefore an s25A access exclusion will be in place year-round.

We do not anticipate any significant risks to affect this feature group as a result of these proposals.

### Disturbance to the Breeding Gull Assemblage

Whilst breeding gulls are an SPA designated feature along this part of coastline, on a smaller SSSI unit scale they are not reportable features at this location (Alde-Ore Estuary SSSI, Unit 33).

Breeding gulls have been reported elsewhere at Orfordness, Havergate Island and at Snape Marshes but do not appear to favour Shingle Street, possibly due to the levels of access onto the shingle at this location as opposed to the former sites.

Therefore we do not anticipate any significant risks to affect this feature group as a result of these proposals.

### Disturbance to the Breeding Avocets and Terns

Avocet have bred in the pools south of Shingle Street in recent years, despite disturbance from foxes, dogs and humans. The large pools close to East Lane car park are landward of the path, therefore are not affected by coastal access rights. The path aligns along an existing PRoW to the north, part of the Suffolk Coast Path. Fringing vegetation may provide some limited cover for birdlife and local signage in Shingle Street advises of the presence of ground-nesting birds. There are no attractors into the coastal margin and the presence of wet ground may deter dog walkers from allowing their dogs to enter this area. Furthermore, we anticipate only a small to medium relative increase in levels of use along this section of path and negligible increase in use of the coastal margin. Therefore we do not consider there to be a risk to this species at this location.

Little terns have bred on the shingle ridges of Shingle Street although there is no longer a regular breeding colony here. Signage advises visitors of the presence of nests and asks that dogs are kept on leads during the breeding season. We anticipate negligible increased use of the coastal margin at this location, as the shingle is already used we consider that a restriction would be ineffective and increased signage may draw unwanted attention to the presence of this species.

We do not conclude a significant risk to breeding terns at this location as a result of these proposals due to the existing patterns of access and the establishment of a clearly waymarked Coastal Path adjacent to the buildings, off the main area of shingle.

Taking a precautionary approach within this assessment we conclude a potential residual risk to this species when present at this location due to the absence of protective fencing or similar measures which would offer further protection. In addition, the England Coast Path proposals for the Aldeburgh to Hopton-on-Sea stretch identified a potential residual risk to these species at certain



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locations. The absence of a breeding colony in recent years contributes to our assessment of a residual risk only at this location.

### Disturbance to Breeding Marsh Harrier

Marsh harrier breed in reeds and marshes, and sometimes arable fields adjacent to wetlands. This habitat does not fall within the majority of coastal margin found at Shingle Street and no breeding records have been found for this species here. Marsh harrier is not a reportable feature for unit 33 of the Alde-Ore Estuary SSSI.

Therefore we do not anticipate any significant risks to affect this feature at this location as a result of these proposals.

### Trampling of the Coastal Plant Assemblage

We are aligning on an existing PRoW to the south of Shingle Street. There are no attractors and the presence of lagoons and wet ground may deter access and encourage walkers to keep dogs on a lead (local signage also encourages this during the breeding season). The path is clearly demarked and the lack of nearby facilities may encourage walkers to continue their journeys.

A 2017 transect study of the area [43] noted the presence of Ramsar plant assemblage component species: dittander (*Lepidium latifolium*) and Perennial Glasswort *Sarcocornia perennis* present near the lower reaches of Barthorp's Creek. A worn circular route has been established within the coastal margin in this area, which is not covered by an s25A access exclusion. Visitors unfamiliar with the area might walk this circular route in error, therefore clear waymarking of the Coast Path will help prevent this from occurring. We anticipate negligible increase in use of the coastal margin in this area.

Therefore we conclude that there is no significant risk to these features at this location.

### Trampling of the Coastal Lagoons; Trampling of fresh/brackish Aquatic Plant Assemblage & Trampling of Aquatic Invertebrates

"Saltmarsh vegetation is also present around the lagoons and borrowpits on Shingle Street, Havergate Island and Kings and Lantern Marshes on Orfordness" [44].

We are aligning on existing walked routes past the lagoon features to the south of Shingle Street, with no attractors into the coastal margin. It is unlikely that walkers would leave the well demarked path and we anticipate a small increase in usage of this route and a negligible increase in use of the coastal margin as a result of these proposals.

Therefore we conclude that there is no significant risk to these features at this location.



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### Trampling of the Vegetated Shingle; Trampling of Shingle & Tidal Litter Invertebrate Habitat

Due to the existing use of the shingle it is considered that an access restriction would be ineffective, and furthermore we anticipate only a negligible relative increase of use of the coastal margin as a result of these proposals. The route is aligned along the PRow landwards of the shingle; walkers are likely to use this waymarked route in preference to crossing the shingle terrain.

We do not anticipate any significant risks to vegetated shingle at this location although the shingle is in unfavourable condition and is not fulfilling its full habitat potential [36], however this habitat is increasing in spatial extent each year [37]. Taking a precautionary approach we conclude a potential residual risk to this feature at this location. Due to the mobile nature of the shingle & tidal litter invertebrates (a bee species and four species of spider) we consider the risk of trampling to be negligible at this location given the relatively low increase in predicted usage across the coastal margin.

### **D3.2B Hollesley and Boyton Marshes**

Hollesley and Boyton Marshes are managed by the RSPB as coastal nature reserves and lie immediately landwards of the proposed England Coast Path alignment. Whilst not designated European sites they provide important supporting habitat for bird species of the Alde-Ore SPA, therefore potential disturbance impacts are considered here.

#### Access Baseline

The route aligns along existing walked routes, the majority of which form part of the Suffolk Coast Path. The Hollesley Marshes reserve is fenced to prevent ingress. The majority of the coastal margin comprises saltmarsh and mudflat covered by an s25A access exclusion and therefore walkers are likely to remain on the path.

The route aligns around the southern and eastern sides of Boyton Marshes, where a drainage channel prevents landward ingress and the coastal margin is covered by the above access exclusion.

#### Environmental Baseline

The marshes attract a variety of breeding and overwintering birds, and avocet and gulls have bred on the site [2].

Sea level rise has impacted populations of birds including black-headed gulls and redshank within the Butley River which have been displaced onto the Boyton and Hollesley Marshes (RSPB, pers comm.)

The RSPB have installed a bench near Banters Barn Farm where visitors can park for free in order to watch for avocets and other bird interest from this slightly elevated position.



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### Detailed design and assessment of risk

Current levels of use between Hollesley and Boyton Marshes are low. There are few places to park although some is available for visitors to the Boyton Marshes reserve at Banters Barn Farm.

Negligible use of the trail and coastal margin are anticipated as a result of these proposals.

### Consideration of possible risks to qualifying features at this location in light of the access proposal

Due to the lack of local facilities we anticipate that levels of increased use on this section of the Coast Path will be negligible. The reserves will not fall under coastal access rights and no additional access is proposed. The route is on an existing PRow.

Seawards of the path much of the coastal margin is covered by an s25A access exclusion as it is unsuitable for access.

Therefore there is not considered to be any significant risk to the bird populations within the Hollesley and Boyton Marshes reserve.

### D3.2C Butley River

#### Current Situation

##### Access Baseline

These England Coast Path proposals include an inland diversion around the Butley River, creating a new continual route. In some areas this includes the creation of new access.

Approaching from the west, the Coast Path follows the PRow around Boyton Marshes, on the route of the Suffolk Coast Path. Walkers will continue northwards to the Butley Foot Ferry landing.

The Butley Foot Ferry can carry up to four passengers across the Butley River and runs on weekends and bank holidays from Easter Saturday to the second Sunday in October, weather permitting.

North of the foot ferry the Coast Path splits, with the main route continuing on the seawall and an alternative inland winter route on the Suffolk Coast Path towards Butley Low corner. This turns northeast at Coulton's Farm along a permissive walked track to rejoin the main route at the seawall. The alternative route will be used from 1<sup>st</sup> September to 31<sup>st</sup> March each year. This creates up to 1.2km of spatial separation between walkers and the European designated sites, therefore is not considered further in this assessment. The alignment on the PRow up to Butley Low Corner is promoted by the Butley Foot Ferry as part of a ten mile circular route around the river, using the ferry service to cross the water [45].





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The main route is for use over the summer months and aligns along the seawall creating new legal access northwards until it joins with Mill Lane. A length of path approximately 253m in length near to Sparrowhill Covert will require prior scrub clearance in order to create a walkable route along the raised bank.

The route aligns through Chillesford on The Street then turns southwards using PRowS around Decoy Wood. The route continues southwards on this PRow until it stops to the southwest of Chillesford Lodge, where a main summer route and an alternative winter route (for the same dates as above) are proposed. Both create new legal access.

These two routes join and new access is proposed on the bank to Ferry Cottage where the path aligns on a section of PRow before continuing on the seawall seawards of Gedgrave Marshes, currently a permissive walked route.

### Environmental Baseline

The Butley River is part of the Alde-Ore Ramsar and SPA and the Alde-Ore and Butley Estuaries SAC and shooting does not take place here. The proposed route aligns immediately adjacent to these along the length of the river.

The lower reaches<sup>2</sup> of the Butley Estuary on average support 17% of the Alde-Ore Estuary SSSI avocet population, 16% of the redshank population, 16% of the teal population and 16% of the wigeon population [2].

The species population trends for avocet, redshank, shelduck, teal and wigeon within this sector reflect the population trends for the whole SSSI. Avocet and teal numbers are steadily increasing, redshank appear to be declining, shelduck numbers remain stable and wigeon seem to be stable but slightly increasing.

Within the middle and upper reaches<sup>3</sup> of the Butley River species population trends for avocet and wigeon reflect the population trends for the whole SSSI; both fluctuate between years but overall numbers are increasing. There has been a large increase in teal from 2000/01 to 2016, while shelduck are also increasing. Numbers of redshank have fluctuated too greatly for population trends to be determined. This sector supports on average 18% of the Alde-Ore Estuary wintering population of teal [2].

The Butley River provides good habitat for overwintering avocet [39] which have been counted in high numbers- e.g. 265 in November 2017 [46], 240 in December 2014 and 400 in January of that year [47]. The lower and mid reaches of the river in particular provide important high tide sites for

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2 The lower reaches of the Butley River is taken here to be within WeBS sector 12, which covers the units 28 – Butley River, 29 – Butley River south and 38 - Gedgrave Cliff of the Alde-Ore Estuary SSSI.

3 The middle and upper reaches of the Butley River are taken here to be within WeBS sector 13 which covers the units 29 – Butley River south, 42 – Butley marsh east, 43 – Butley marsh west, 44 - Butley marsh/reedbed north & Decoy Wood.



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avocet [2]. Whilst present all year round, important breeding sites for avocet are noted elsewhere on Orford Ness and Havergate Island [2].

The Butley River provides important high tide locations for overwintering teal along its length. The upper reaches (the Alde-Ore Estuary SSSI Unit 44) also provides an important low-tide location [2]. Redshank and wigeon use the river at both high and low tides. The area is important for autumn passage black-tailed godwits; the peak being about 500 between September and January (RSPB, pers comm.).

Breeding marsh harrier are present on the Butley River. They have bred at this location in low numbers in 2014, 2015 and 2016 [2]. In 2018 two nesting attempts were made in the upper reaches although both nests failed [4]. Land on the east side of the Butley River is managed by the RSPB and their volunteers.

Signage at the Butley ferry landing on the east bank informs visitors of the wildlife interest in the area and asks that dogs are kept on leads and that care is taken not to trample any saltmarsh plants.

### Detailed design and assessment of risk

There is no legal access on the seawall on the western seawall of the Butley. Occasional use is noted in the reedbeds near Butley Mills where a picnic table and sculptures are located. The PRoW (and Suffolk Coast Path) from Burrow Hill to Mill Lane and Chillesford has low levels of use.

There is local desire for increased access around the Butley River, and the establishment of these Coast Path proposals would create a new shorter circular route from the Butley Foot ferry to Chillesford and back again on the opposite bank (although this would be over 10km). There is limited local parking towards the south, with some available near Banter's Barn Farm, and facilities available at Chillesford. The existing PRoWs already have some useage so we anticipate a small increase in use over these sections of the trail, rising to up to medium in areas of new access.

Occasional use can be seen in the reedbeds near Butley Mills where a picnic table and sculptures are located. Low levels of use by walkers continue through Chillesford High Street and onto the PRoW past Decoy Wood on the east side of the Butley River. By Crag Pit there is only occasional use and there is currently no access southwards from the Parish boundary between Chillesford parish and Gedgrave parish.

The PRoW stops at the Butley Ferry but low levels of use continue on the seawall which is currently a permissive route agreed between the landowner and Access Authority and extends around the whole of Gedgrave Marshes to Tide Gauge. At Tide Gauge a PRoW from Gedgrave Road links to the seawall and continues northwards to Orford.

The coastal margin in this area predominantly comprises river muds, reeds and related habitats which are unsuitable for public access and are therefore covered by an s25A restriction to exclude public access year-round. At the north of the river, adjacent to Butley Mills, an s24 access exclusion will be applied for land management purposes to prevent damage to a commercial crop.



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Decoy woods near Chillesford are within spreading room, however walkers are unlikely to leave the path as the wood is uninviting and wet underfoot. We anticipate negligible to no increase in use of the coastal margin in these areas.

Due to the creation of new access in an area with an anticipated medium increase in use of the trail we have thoroughly considered the options for mitigation, particularly to address the potential risk of disturbance to overwintering birds.

We see an opportunity to create a set of interpretation panels around the Butley River which will complement each other and emphasise that the whole of the Butley River contains special wildlife interest. These panels will serve to inform walkers of the presence of bird species and ask that dogs should not be permitted to enter the water, or otherwise cause disturbance to birds. The panels will also outline the alternative routes and the short section where the dogs to leads restriction is located, forewarning walkers of these mitigation measures. They will help encourage the development of positive behaviours in this area of new access.

The interpretation panels will be placed in locations likely to be seen by visitors to the area. We propose a panel near to the Butley Foot Ferry landing on the west bank, to provide information to those using this ferry, or choosing to view it from the bank as part of a walk. The third panel will be located on the track from Butley Low Corner on the west bank, where the alternative winter route joins the main trail. This will be viewed by those visiting the River from the west using this track. The fourth panel will be on the west bank at the junction between Mill Lane and the new access, viewed by those travelling south from Chillesford. And finally, a panel is proposed at the junction between the track from Chillesford Lodge and the main trail to be viewed by those approaching the Butley River from the east.

### **Consideration of possible risks to qualifying features at this location in light of the access proposal**

#### Disturbance to the Non-breeding Wetland Bird Assemblage

The Butley River is an important overwintering site for birds and we are grateful for the RSPB's input in designing these proposals.

The alignment is along the seawall and in close proximity to the bird interest with the potential to cause disturbance. The site is particularly important for its overwintering birds, who may expend energy during disturbance events that reduces their ability to survive the colder months.

We therefore propose two restrictions along parts of the seawall during the winter months, from 1<sup>st</sup> September to 31<sup>st</sup> March. Alternative winter routes are provided for walkers which are off the seawall reducing the likelihood of disturbance. Please see Map 4 below.



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### The West Bank Alternative Route:

From the Butley Foot Ferry landing northwards to near Butley Low Corner.

- Advisory signs are to be installed at the north and south ends of the alternative route to inform walkers.
- Gates at the north and south will direct walkers to either the main or alternative route as appropriate for the time of year.
- Timber steps at the north end will create a convenient access onto the alternative route thereby encouraging its use.

### The East Bank Alternative Route:

From the end of the PRoW near Cook's Barn southwards for about 1.2km?

- High quality interpretation boards at each end of both alternative routes will inform the public of wildlife sensitivity and encourage them to leave the sea wall. Due to the proximity of the seawall we consider interpretation boards important to encourage compliance.
- Steps from the sea wall onto the landward folding will be installed to encourage access.
- Two robust seats will be installed to encourage walkers down off the sea wall at both ends to enjoy the views across the grazing marsh and hills.
- Signage will inform walkers that the landward folding is grazed and that dogs must be kept on short leads in the vicinity of livestock.
- Plans to install a platform and screen for birdwatchers partway along the alternative route will provide an opportunity for concealed birdwatching. This will be a simple viewing platform and screen and will act as a focal point, encouraging walkers off the seawall and on to the winter alternative route.

RSPB staff will undertake to lock the gates at the north and south end of the alternative routes seasonally, thus ensuring no access on the seawall during the winter months.

Much of the remaining length of new access on the east bank, from Ferry Cottage northwards to the split between the main and alternative routes, is fenced on the seaward side which will prevent walkers from accessing the water and deter dogs from entering.

On the west bank there is a length of new access on the seawall north of the alternative route. The northernmost part of this aligns on the headland of an arable field with vegetation providing a screen between walkers and the River. Further south this vegetation becomes more sparse, although tall reeds in places provide cover. Vegetation clearance will take place along approximately 253m of the seawall to create a walkable path along the bank, wherever practicable vegetation will be left seawards of the path to create a visual screen.

We conclude that these mitigation measures will result in no significant adverse effects to this feature at this site. However as this is new access we are taking the precautionary principle and concluding that there may be a residual risk.



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### Disturbance to the Breeding Gull Assemblage

The Butley River is not a known location for breeding gull populations, although these nest nearby on Havergate Island. SSSI Units 28, 29, 42, 43 and 44 do not list gulls as reportable features and these are not likely to be present in these units [2]. There is no proposed access into much of the coastal margin due to the presence of the s25A and s24 restrictions and furthermore, signage will encourage dogs to be on leads in the presence of livestock on the east bank which may indirectly benefit this feature.

Therefore we do not conclude any risk to this feature at this location.

### Disturbance to the Breeding Avocets and Terns

The Butley River does not contain shingle habitat suitable for breeding terns, and therefore there is no appreciable risk to this feature at this location.

The Butley river is not a known key breeding site for avocet, although they use Lantern Marshes, Kings Marshes and nearby land on Orford Ness in the vicinity [2]. The lower and mid reaches of the river in particular provide important high tide roost sites for avocet, ie they are likely to benefit from the proposed section along which dog owners are required to keep their dogs on a lead [2].

Avocet breed in areas where brackish water is present along with areas of bare mud. An s25 restriction excludes access to suitable breeding habitat from the public. Dog walkers will be advised to keep their dogs on leads when in the presence of livestock on the east bank.

We are therefore able to conclude that there is no significant risk to this feature at this location.

### Disturbance to the Breeding Marsh Harrier

Marsh harrier nest in thick reedbed close to open water and have attempted to breed in the upper reaches of the Butley River in recent years [4].

Advisory signage is proposed to request that owners keep dogs to leads on the sea wall in the presence of livestock on the eastern bank. An s25A access exclusion is present across areas of saltmarsh unsuitable for access.

We conclude no significant risk to this feature at this location.

### Trampling of the Coastal Plant Assemblage

Much of the ground seawards of the route alignment is unsuitable for access and therefore will be subject to and s25A year-round access restriction. The route alignment is clearly waymarked and there are no attractors to leave the path, which in some areas is fenced on the seawards side.



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A section 24 access exclusion for land management is proposed across an area of commercial reedbeds south of Chillesford, which are unsuitable for public access.

A 2017 saltmarsh vegetation transect study commissioned by Natural England [37] recorded the presence of two Ramsar plant assemblage component species - dittander (*Lepidium latifolium*) and perennial glasswort *Sarcocornia perennis* along the western bank, south of Chillesford. Approximately half of this transect length will be covered by our proposed s24 access restriction. The remaining length is within unrestricted coastal margin south of Butley Mills and so has been considered in greater detail.

The coastal margin immediately south is predominantly reedbed, and not inviting for general recreational access use. Artistic statues have been installed in the reedbeds near to Butley Mills and worn routes to these have been created by visitors, however this only affects a small area and visitors are unlikely to leave these worn routes. We anticipate a negligible increase in the use of the coastal margin at this location and therefore do not conclude any significant risks to the coastal plant features.

Therefore there are considered to be no additional risks to coastal plants as a result of these proposals.

### Trampling of the Shingle & Tidal Litter Invertebrate Habitat

Specialist advice was sought with regards to this feature group. Accumulations of tidal litter can provide important habitats for invertebrates, in particular the drift zones associated with upper saltmarsh. In many areas along this stretch the presence of the seawall close to the water's edge leaves little room for this upper saltmarsh habitat to develop. However one area which contains an accumulation of tidal litter within the coastal margin is at Gedgrave Cliffs, near to Ferry Cottage on the eastern bank of the Butley River. A length of approximately 140m of this habitat has been considered further. We are proposing new coastal access in this location although the area is currently used by those on foot and with vehicles associated with the commercial oyster bed operations. Given the relative increase in walkers at this location our proposals are not likely to cause significant impacts to the potential invertebrate habitat in the area.

Elsewhere on the stretch, Orford Ness is likely to hold suitable habitat of much greater extent than at the Gedgrave Cliffs.

## **D3.2D Gedgrave Marshes to the River Alde**

### **Current Situation**

#### Access Baseline

There is a current permissive walked route on the seawall around Gedgrave Marshes and these proposals seek to establish legal access. Suffolk County Council signage located near the Orford ferry landing on the east bank informs walkers of a 'licenced footpath to Orford for walkers from the



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Butley Ferry- 4 miles. Dogs must be kept on leads' and indicates that livestock and birdlife are present in the area (signage noted October 2019).

The alignment continues on the seawall to Orford, overlying an existing PRow near Chantry Point. The route follows this PRow past Town Marshes until the presence of the River Alde requires the path to turn inland.

### Environmental Baseline

The proposed alignment runs adjacent to the landward edge of the Alde-Ore Ramsar, Alde-Ore SPA and the Alde-Ore and Butley Estuaries SAC sites. There is no seawards spreading room as any seawards coastal margin is comprised of ground unsuitable for public access and therefore subject to an s25A access exclusion.

Overwintering birds including avocet, redshank, shelduck, teal, wigeon and ruff overwinter use the Town Marshes area inland of the stretch. Licenced shooting activity occurs along this stretch including at Town Marshes.

### **Detailed design and assessment of risk**

Current levels of use are low on the PRow from the Tide Gauge and increase around Chantry Point to medium levels. Approaching Orford, about 300m from the B1084 (Quay Street) levels of access increase to high in summer. To the north east of Orford levels are medium-high during summer but low to medium in winter. By the sluice at Town Marshes there is occasional use of the PRow which continues to Ferry Farm. At Ferry Farm the PRow meets Ferry Lane.

We anticipate a negligible increase in use of the trail at this location, as existing patterns of access are unlikely to change.

We anticipate negligible increase in use of the coastal margin as much of this is saltmarsh and flat unsuitable for public access and therefore subject to an s25A access restriction. In addition fencing seawards of the alignment prevents access.

### **Consideration of possible risks to qualifying features at this location in light of the access proposal**

Disturbance to the non-breeding wetland bird assemblage; breeding gull assemblage; breeding avocets and terns; breeding marsh harrier; Trampling of the coastal plant assemblage; shingle & tidal litter invertebrate habitat

The route aligns along clearly marked existing access routes and the coastal margin is subject to a year-round s25A access exclusion. In addition, fencing prevents access seawards along much of this length. Fencing landwards along much of this length prevents ingress to the coastal grazing marsh habitat inland. In places fencing has been installed to prevent access by walkers and dogs.



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Therefore there is not considered to be a risk to these features at this location.

### D3.2E Iken Marshes & Iken Cliffs

This section considers the stretch proposals from where the path turns inland to route around the Alde-Ore to the Iken Cliff Car Park.

#### Current Situation

##### Access Baseline

The proposed alignment follows the seawall turning inland at the River Alde. The route will align along Ferry Road and the subsequent minor road to Iken Cliff, away from the European designated sites.

Current levels of use are low. However sailing activities take place on the watercourse with the Slaughden Sailing Club and the Aldeburgh Yacht Club located nearby. Boat trips are available from Snape and the Alde & Ore Wildfowlers' Association moor their club boat at the Saltings.

A large car park is available on Tunstall Road, west of Iken. The proposed route provides good views from Iken Cliff across to The Anchorage. Our proposals include alignment along the footpath adjacent to the water's edge at Iken Cliff but, in part the alignment is on adjacent higher, drier ground. Dogs have been noted to disturb the birds here, an ongoing issue at this site.

##### Environmental Baseline

The River Alde is a designated SPA, SAC and Ramsar site and is an important overwintering location for birds. There is the potential for disturbance to these birds from the proposed main route on the seawall around these marshes, where wildlife is not habituated to access.

Landwards of the alignment avocet and marsh harrier have bred on land near Stanny Farm. Avocet have bred regularly since 2005 and marsh harriers have bred here in small numbers in over half the years between 1988 and 2016 [2].

The River Alde at Iken Marshes forms WeBS sector 4 of the Alde-Ore estuary site which supports on average 13% of the wintering population of shelduck, teal and redshank within the Alde-Ore Estuary and 15% of the wigeon population [2].

Teal and avocet numbers are steadily increasing, redshank appear to be declining and shelduck numbers remain stable. The wigeon population trend includes large yearly fluctuations although is in decline, contrasting the trend across the wider area [2].

Land at Iken Marshes provides important feeding locations for avocet (data collected in 2001/02) [2]. Important feeding sites for redshank included the mudflats in the centre of this section (low tide





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area CA013). In 2001/02 the land around Stanny Farm (CA015) was an important winter feeding site for teal. The mudflats at Iken Marshes (CA012 and CA013) were important for wigeon in 2001/02.

The west of the Marshes, at The Anchorage and at Iken Cliffs, is a key site for redshank (WeBS sector 2). This sector supports 22% of the Alde-Ore population of redshank, 30% of the avocet and 19% of the shelduck [2]. Avocet numbers are increasing and shelduck numbers are stable, in line with the trends across the whole Alde-Ore estuary. Wigeon are decreasing in contrast to the whole site trend.

### Detailed design and assessment of risk

There is no current access around Stanny Point and this will remain the case. The Anchorage currently experiences low levels of access, increasing to medium levels towards Iken Cliff where the car park is located.

We anticipate a small increase in use of the Coast Path along this section. Concentrations of walkers and other visitors at Snape Maltings (see next section) are expected to remain at their current high levels.

We anticipate negligible increase in use of the coastal margin because much of this is covered by restrictions to access year-round (of three different types, see the relevant Report for full details).

Around the Alde Ore Estuary we propose to install a set of interpretation panels which will complement each other and emphasise that the whole of the Estuary contains special wildlife interest. These panels will serve to inform walkers of the presence of bird species and ask that walkers minimise potential disturbance to birds.

The interpretation panels will be placed in locations likely to be seen by visitors to the area. We propose that one panel is placed either end of the Iken Cliff section, ie on the PRoW near to Church Lane, and one at the Iken Cliffs car park. Further signs will be placed at the west end of the Sailors' Path corner and two at points near Aldeburgh Marshes.

### Consideration of possible risks to qualifying features at this location in light of the access proposal

#### Disturbance to the Non-breeding Wetland Bird Assemblage

Because the route follows minor roads, inland of the marshes, this minimises the risk to both the breeding and overwintering bird populations.

We propose to prevent and deter access into the reedbeds adjacent to the footpath at Iken Cliff via the placement of brush piles, which will block the worn routes into the reedbeds and allow these plants to recover. The Suffolk Wildlife Trust will source the brush and determine the most appropriate locations at the time of establishment. The ECP will cover the costs associated with the transport and installation of this material.



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In addition, the interpretation panels at either end of the Iken Cliff section (i.e. on the PRow near to Church Lane, and one at the Iken Cliff car park) will promote positive visitor behaviours requesting that dogs are not permitted to enter the water or to chase bird interest.

### Disturbance to the Breeding Gull Assemblage

The Alde Estuary is not a known location for breeding gull populations, although these nest nearby on Havergate Island and Orfordness. There is no proposed access into much of the coastal margin due to the presence of the s25A exclusion.

Therefore we do not conclude any significant risk to this feature at this site.

### Disturbance to the Breeding Avocets and Terns

This area does not provide suitable shingle habitat for breeding little terns.

Avocet regularly breed on the Alde-Ore Estuary (inc. at Stanny House in recent years), however the route is well inland of the marshes, providing spatial separation between path users and potential breeding habitat. The main area of marshes at Stanny House will fall in the coastal margin, but access will be restricted for conservation reasons (CROW s26(3a) restriction). The river wall around Iken Marshes will also be restricted in the same way, and the saltmarsh on the estuary side of the wall is covered by an s25A access exclusion.

The placement of interpretation panels and brash to reduce the risk of disturbance, particularly from dogs, is outlined above and will benefit these species.

Therefore we do not consider there to be additional risks to this feature at this location.

### Disturbance to the Breeding Marsh Harrier

As above, the large area of suitable habitat combined with and the s25A and s26(3a) year-round access restrictions to prevent access to the river wall and marshes will reduce the potential for bird disturbance.

The placement of interpretation panels and brash to reduce the risk of disturbance, particularly from dogs, is outlined above and will benefit these species.

Therefore we do not consider there to be additional risks to this feature at this location.

### Trampling of the Coastal Plant Assemblage

East of Iken Church the route will mainly follow minor roads some distance inland; west of Iken Church we are proposing to walk mainly on the existing public footpath with the areas of saltmarsh subject to a year-round s25A access exclusion.



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Therefore there are considered to be no additional risks to coastal plants as a result of these proposals.

### Trampling of the Shingle & Tidal Litter Invertebrate Habitat

The habitat type required by these species is not present within spreading room at this location.

### **D3.2F Snape Maltings**

This section considers the impact of the path from Iken Cliff car park, northwest to Snape Maltings and the crossing of the River Alde at Snape Bridge, before aligning parallel to the north bank along the Sailors' Path to the start of the Snape Warren open access land.

### **Current Situation**

#### Access Baseline

From the Iken Cliff car park the path aligns either on or immediately adjacent to the PRow, part of the Suffolk Coast Path. Part of the alignment lies within the European sites boundary on an existing path, part of the 'Snape Explorer South Trail' route promoted by the AONB.

At Snape Maltings the path crosses the Snape Bridge and aligns along the bank adjacent to the European Designated sites, an existing PRow known as the 'Sailors' Path' and promoted by the AONB as part of the 'Snape Explorer North Route' circular walk. This is a well-used trackway around the landward edge of the Snape Warren Open Access land, managed by the RSPB.

#### Environmental Baseline

This section of the path aligns close to the Alde-Ore Estuary which is a designated Ramsar, SAC and SPA site. This area is an important high and low tide location for non-breeding avocet, redshank and shelduck [2].

This part of the Estuary is surveyed as 'WeBS sector 1' within the Alde-Ore WeBS site. It is a key sector for non-breeding redshank and shelduck and supports the most individuals when compared to other sectors of the site. This sector supports on average 23% of the Alde-Ore estuary redshank population and 21% of shelduck. It also supports 20% of the Alde-Ore population of avocet [2].

The species population trends for these birds reflect trends for the whole site. Avocet and teal numbers are increasing, redshank appear to be declining, shelduck numbers are stable and wigeon are stable but slightly increasing [2].

Marsh harrier have been recorded nesting in Snape Wetlands and in 2018 three pairs fledged four young [4]. Breeding marsh harrier are not reported from this part of the estuary (SSSI units 1-4) but have instead been noted further eastwards within units 8 and 9 [2].



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Avocet are present year-round on the estuary but their important breeding sites are noted as on Orfordness, units 16, 18 and 22 (Lantern Marshes, Kings Marshes and land southwest of Kings Marshes).

### Detailed design and assessment of risk

The route from Iken Cliffs towards Snape Maltings is currently used at medium to high levels, with high usage around Snape Maltings and its facilities. Once over Snape Bridge, access levels drop to between medium and high towards the western edge of Snape Warren.

We anticipate a small increase in usage of the route in this area with the advent of the Coast Path. From Snape Bridge eastwards, the promotion of the attractive Sailors' Path is likely to incur a large increase in access. Visitor facilities are good at both Snape and Aldeburgh, about 10km apart.

We anticipate negligible change in use of the coastal margin within this key site as much of this is unsuitable for public access and is covered by an s25A access exclusion.

### Consideration of possible risks to qualifying features at this location in light of the access proposal

#### Disturbance to the Non-Breeding Wetland Bird Assemblage

The wetland areas will be covered by an s25A access exclusion as they are unsuitable for access. The path aligns along well-walked and promoted paths in the area, therefore we do not consider our proposals to add a significant disturbance pressure in the area.

We propose to install an interpretation panel at the west end of the Sailors' path to promote positive visitor behaviours and informing visitors of the special wildlife interest of the area.

#### Disturbance to the Breeding Gull Assemblage

This location on the Alde-Ore Estuary is not a known location for breeding gull populations, although these nest relatively nearby on Havergate Island and Orfordness. The Alde-Ore Estuary SSSI Units 1,2,3,4 in this area do not list gulls as reportable features and these are not likely to be present in these units [2]. There is no proposed access into much of the coastal margin due to the presence of the s25A.

Therefore we do not conclude a significant risk to this feature at this site.

#### Disturbance to the Breeding Avocets and Terns

Avocets are present on the Alde-Ore estuary year round although their important breeding sites are noted as being on Orford Ness (Lantern Marshes, Kings Marshes and land southwest of Kings Marshes).



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Breeding avocet and terns are not reported as likely to be present within the SSSI units relevant to this area of the Estuary (units 1, 2, 3 or 4) [2].

This area does not contain shingle habitat suitable for breeding terns and breeding has not been reported for this site.

Therefore these features are not likely to be significantly affected by these proposals at this location.

### Disturbance to the Breeding Marsh Harrier

As we are aligning on existing walked routes where these species are unlikely to be breeding we do not consider that these proposals pose a risk to this species at this location.

### Trampling of the Coastal Plant Assemblage

The alignment is on existing promoted walked routes with minimal coastal margin, much of which is subject to a year-round access exclusion.

Therefore we consider no significant risk to affect this feature at this location as a result of these proposals.

### Trampling of the Shingle & Tidal Litter Invertebrate Habitat

The habitat type required by these species is not present within spreading room at this location.

## **D3.2G Snape Warren**

### **Current Situation**

#### Access Baseline

Snape Warren is an area of Open Access heathland managed by the RSPB and alignment decisions here have been informed by discussions with this organisation and the landowner. Our proposals are to align around the northern edge of this area of Open Access land on an existing walked route. Promoted as the Snape Warren Trail. Current signage advises that dogs should be kept on leads in the area.

#### Environmental Baseline

Nightjar and woodlark breed on this area of heathland and conservation works by the RSPB include the clearance of scrub and bracken to create a more open heathland environment. Signage is in place which advises walkers to keep to the paths with their dogs on leads in order to protect the environment.



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The Open Access heathland seawards of the path and within the coastal margin may attract some visitors (such as bird-watchers) away from the paths, but in some specific areas vegetation including gorse may discourage access.

South of Snape Warren towards the Alde Estuary rough grasses make the terrain difficult, and closer to the water's edge the presence of saltmarsh and fringing vegetation means that an s25A access exclusion is proposed. In the autumn of 2020, shortly before this HRA was finalised, surveys carried out by Toby Abrehart found the rare narrow-mouthed whorl snail *Vertigo angustior* as well as significant numbers of roosting waders (e.g. 500 curlew and 350 black-tailed godwit). The snail is listed on Annex II of the Habitats Directive and is endangered in the UK, until 2005 only being known from some ten sites. Both the snail itself, and its tussocky grass habitat, would be vulnerable to increased use of the area by walkers. As a result of this discovery, a s26(3a) restriction has been proposed on the area of land lying between the arable fields (excepted from coastal access) and the saltmarsh (s25A restriction). As this area lies over 1.5km from the Coast Path route, with arable fields in between, it is thought that very few people will be affected by this restriction. The importance of the area is increased by the lack of any river wall allowing tidal effects to extend gradually up the slope to the north, supporting transitional habitats.

### Detailed design and assessment of risk

There is currently a medium level of usage across this part of the proposed route. We anticipate a small relative increase in the number of walkers in the area due to the proximity of the facilities at Snape Maltings and the promotion of the Sailors' Path as part of a National Trail. We anticipate a negligible increase in use of the coastal margin along this section of route. Despite this, the discovery of the rare snail as above, as well as significant numbers of roosting waders, has led to an additional s26(3a) restriction between the arable fields and saltmarsh.

### Consideration of possible risks to qualifying features at this location in light of the access proposal

#### Disturbance to the Breeding Heathland Birds (nightjar and woodlark)

We are aligning on existing managed Open Access land on a well-waymarked path. This was originally set up by the RSPB to direct walkers away from known favourable bird territories and therefore little risk of disturbance to breeding birds is anticipated. Signage encourages walkers to keep dogs to leads and advises of the wildlife interest.

Due to these above reasons we do not consider there to be a risk to these features at this site.

#### Disturbance to the Non-Breeding Wetland Bird Assemblage

Although there are few attractors into the coastal margin and the Coast Path route is direct, even the presence of a small number of extra walkers to the east and south of the New England Farm arable fields could cause significant disturbance to the wintering bird interest of the Alde-Ore SPA/SSSI. Recent high tide roost surveys (by Toby Abrehart) have found significant numbers of



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curlew (the 500 birds recorded here is over 50% of the SPA's total), black-tailed godwit (29% of the SPA total), avocet and redshank (23% of the SPA total).

Taking account of this risk to roosting waders (and also likely disturbance of feeding waders on the nearby mudflats before/after high tide), a s26(3a) restriction is proposed. This restriction will also help safeguard the snail *Vertigo angustior* and its habitat (see above).

The adjacent saltmarsh areas will be covered by an s25A access exclusion as they are unsuitable for access.

### D3.2H Hazlewood Marshes

The Hazlewood Marshes Nature Reserve lies within coastal margin and is part of the SAC, SPA and Ramsar sites. The route alignment passes within 100m of this site so taking a precautionary approach potential impacts to this reserve are assessed here.

#### Current Situation

##### Access Baseline

The site, and access to it, is managed by the Suffolk Wildlife Trust. A trail is promoted around the western edge of the marshes to a bird hide [48]. Dogs are not permitted at this location.

Car parking is available where the Sailors' Path joins the Saxmundham Road, and about 10 minutes' walk from the reserve.

##### Environmental Baseline

In 2013 the tidal surge event breached these marshes and flooded the site. Communities of plants were lost and the birds which previously depended on them (water rail, bittern) left the site. However the subsequent creation of an intertidal habitat has attracted new species and the site reopened in 2016. Lapwing and redshank breed at this site [49], as do avocet. In 2016 two pairs nested and fledged two chicks [2].

The relevant SSSI unit 7 was last assessed in October 2013, prior to the flooding event.

Breeding marsh harriers were recorded on the site in 2007, 2009, 2011 and 2013 prior to the flooding event [2].

#### Detailed design and assessment of risk

The route is aligned at least 90m away from Hazlewood Marshes, therefore walkers on the path are not expected to impact the site. Along this part of the alignment there are medium levels of access currently, and we anticipate a small relative increase in users of this part of the route. It is possible



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that walkers may wish to visit the Hazlewood Marshes nature reserve as they pass by. The reserve is promoted online so visits from wildlife enthusiasts, and local usage, is unlikely to change.

We do not anticipate the existing management practises to change as a result of these proposals and anticipate a negligible increase in use of the coastal margin at this location. The marshes themselves are unsuitable for access and will be subject to a proposed s25A year-round access exclusion.

### **Consideration of possible risks to qualifying features at this location in light of the access proposal**

#### Disturbance to the Non-breeding Wetland Bird Assemblage

Prior to the 2013 tidal surge this was an important site for wetland birds, however this has now given way to an intertidal habitat. This nature reserve is managed by the Suffolk Wildlife Trust and is promoted on their website. Dogs are not permitted on site.

We do not anticipate any significant risks to this feature group at this location.

#### Disturbance to the Breeding Gull Assemblage

The Alde Estuary is not a known location for breeding gull populations, although these nest nearby on Havergate Island. There is no proposed access into much of the coastal margin, including Hazlewood Marshes, due to the presence of the s25A exclusion.

We do not anticipate any significant risks to this feature group at this location.

#### Disturbance to the Breeding Avocets and Terns; Breeding Marsh Harrier

This site is managed by the Suffolk Wildlife Trust with existing practises in place such as the exclusion of dogs. As we anticipate a negligible increase in use of the coastal margin in this location there is not likely to be a significant impact on these features at this location.

#### Trampling of the Coastal Plant Assemblage

The route is aligned on existing access and access to the Hazlewood Marshes is managed by the Suffolk Wildlife Trust. No additional access is proposed across Hazlewood Marshes due to the proposed s25A year-round access exclusion as it is unsuitable for access.

We do not consider any significant risks to this feature at this location.

#### Trampling of the Shingle & Tidal Litter Invertebrate Habitat

The habitat type required by these species is not present within spreading room at this location.





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### D3.2I Aldeburgh Marshes

This section considers the stretch of path adjacent to the Alde-Ore Estuary. This begins on the east bank of the Estuary approximately opposite Cob Island, and ends where the path turns northwards away from the Estuary towards Aldeburgh.

#### Current Situation

##### Access Baseline

The seaside town of Aldeburgh is present to the north east of this section.

These proposals include using the existing PRoW on the sea wall from the car park at the southern end of Slaughden Road. The PRoW and proposed route turns off the bank, across Aldeburgh Marshes following this until it joins Saxmundham Road.

Part of the sea wall around the Aldeburgh Marshes was improved in 2017 to provide increased resilience against flooding as part of the Alde and Ore Estuary Plan [50]. Phases 2 and 3 of this are proposed for 2020 to 2023 and may involve temporary closures of part of the coast path.

The Slaughden Sailing Club and the Aldeburgh Yacht Club are located nearby and sailing activity is commonplace in the area.

##### Environmental Baseline

The Aldeburgh Marshes are important for overwintering redshank (the Alde-Ore Estuary SSSI units 8 and 10) at high and low tide, and for ruff and teal at high tide (SSSI unit 10) [2]. Shelduck and wigeon use both SSSI units at high tide and units 10 and 8 at low tide respectively.

This sector of WeBS (sector 5 of the Alde-Ore Estuary site) has recorded species population trends which reflect that of the wider Alde-Ore Estuary site. Avocet and teal numbers are increasing, redshank are declining and shelduck numbers are stable. Wigeon are variable but increasing [2].

#### Detailed design and assessment of risk

There are current low levels of use on the PRoW on Aldeburgh Marshes, rising to medium further south along the PRoW closer to Aldeburgh. Medium levels become high on the approach to the Fort Green car park in Aldeburgh. We anticipate a small increase in path users along this stretch.

The path alignment on the seawall means that there is minimal coastal margin, and what is present is unsuitable for public access and therefore subject to a year-round s25A access exclusion. A negligible increase in use is therefore predicted.

Around the Alde Ore Estuary we propose to install a set of interpretation panels which will complement each other and emphasise that the whole of the Estuary contains special wildlife



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interest. These panels will serve to inform walkers of the presence of bird species and ask that walkers minimise potential disturbance to birds. We propose to place one sign on the edge of the Marshes, and another on the sea wall south of Aldeburgh where the PRoW westwards begins (and walkers would cross the Slaughden Road).

### **Consideration of possible risks to qualifying features at this location in light of the access proposal**

#### Disturbance to the Non-Breeding Wetland Bird Assemblage

This route is on an existing PRoW and the coastal margin is covered by an s25A exclusion. Given the high levels of access close to Aldeburgh it is unlikely that these proposals will cause additional risks to this feature at this location.

We propose two interpretation panels at either end of this section to promote positive visitor behaviours and to inform visitors of the special wildlife interest in the area.

We do not consider any significant risks to this feature at this location.

#### Disturbance to the Breeding Gull Assemblage

The Alde Estuary is not a known location for breeding gull populations, although these nest nearby on Havergate Island. There is no proposed access into much of the coastal margin due to the presence of the s25A exclusion. This route is on an existing PRoW.

Therefore we do not consider any significant risks to this feature at this location.

#### Disturbance to the Breeding Avocets and Terns

This route is on an existing PRoW and the coastal margin is covered by an s25A exclusion. SSSI unit 8, at the westernmost part of this key site, is likely to support breeding avocet [2] although this includes suitable habitat at Stanny Point and Cob Island on the west side of the river.

Therefore we do not consider any significant risks to this feature at this location.

#### Disturbance to the Breeding Marsh Harrier

SSSI unit 8 is likely to support breeding marsh harrier, however as above this is likely to be on the marshland habitat of Stanny Point and Cob Island on the far side of the Estuary and therefore spatially separated from path users. This route is on an existing PRoW and the coastal margin is covered by an s25A exclusion.

Therefore we do not consider any significant risks to this feature at this location.



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### Trampling of the Coastal Plant Assemblage

This route aligns along an existing PRoW with very little available coastal margin as it is covered by a s25A access exclusion.

Therefore we do not consider any significant risks to this feature at this location.

### Trampling of the Shingle & Tidal Litter Invertebrate Habitat

The habitat type required by these species is not present at this location.

## **D3.2J Orford Ness**

The route does not align onto Orford Ness as there is no way to get off the Ness at the southern point near Orford. It falls though within coastal margin and therefore has been assessed here.

### **Current Situation**

#### Access Baseline

The Orford Ness National Nature Reserve is managed by the National Trust and attracts approximately 8500 visitors per year [51]. Trails across the area are promoted and the trail leaflet asks visitors to keep to the well-waymarked routes. This is important due to the history of the site and the potential for unexploded ordnance in some areas, in addition to the 'very fragile habitats and wildlife' which 'can be easily damaged and disturbed' [52]. The main visitor trail (red route) is available year round, other routes are seasonal. Dogs are not permitted on the reserve.

Visits to Orford Ness are via boat trips from Orford Quay. During 2019 these boats ran on Saturdays from April to June, Tuesday-Saturday from June to September and Saturdays only during October.

Access on foot to Orford Ness is only possible from the north, where a PRoW terminates at the edge of the NNR. Public access is strongly discouraged and the NNR management plan aims to "manage and prevent where possible all unauthorised access by the public, on foot, cycle or by vehicle via Slaughden, or by boat from the river" [51]. To this end a locked metal gate is present at the edge of the NNR to prevent unauthorised vehicular access, alongside a sign stating 'strictly no access beyond this point (fragile habitats and wildlife easily damaged and disturbed)'. Keys to the gate are held by National Trust staff and volunteers.

Access beyond this point is low and includes permitted access granted to those with fishing licences from the Orford Ness Angling Club (ONAC) focused within the area up to 500m south of the gate, where there is a haulage track and sea defence groynes on the seaward side. Approximately 300 fishing licenses have been granted. Wildfowling also shoot under licence on Orford Ness from October to February. A second locked field gate at the end of the haulage track, along with barbed wire and signage, serves to remind all, that no access is permitted, and reminds ONAC members not



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to continue by vehicle beyond that point. In addition, natural erosion approximately 500m south of the first gate has narrowed access, reducing the possibility of vehicular access.

Recreational use of the spit by visitors who use private boats for access is discouraged. However due to historic use the National Trust tolerates waymarked permissive routes across the width of the spit at the southern end, in addition to a short PRow opposite the north end of Havergate Island. Visitors sail to the landwards side of the spit, cross the shingle on foot and access the beach on the seawards side.

### Environmental Baseline

Orford Ness contains the full suite of legal nature conservation designations as it is part of a National Nature Reserve, the Alde-Ore Estuary SSSI, Alde-Ore Estuary SPA, Alde-Ore and Butley Estuaries SAC, Alde-Ore Estuary Ramsar Site, and Orfordness-Shingle Street SAC, the Suffolk Coast and Heaths AONB and the Suffolk Heritage Coast. It hosts a significant portion of Europe's vegetated shingle habitat.

The SSSI citation states "Orfordness contains one of the best examples of zonation in the shingle vegetation. Above the high water mark *Rumex crispus* and *Glaucium flavum* give a highly distinctive character to the mainly bare shingle, with *Lathyrus japonicus* becoming much more abundant within the matrix further inland. This vegetation gives way in turn to grassland dominated by *Arrhenatherum elatius* and *Silene maritima*. A wide range of rare or local species also occur including yellow vetch *Vicia lutea* and the dwarf clovers *Trifolium suffocatum*, *T. glomeratum*, *T. striatum*, *T. scabrum* and bur medick *Medicago minima*... There are also very large breeding colonies of black-headed gull, lesser-black-backed gull and herring gull on Orfordness."

Orford Ness has a history of military testing through the World Wars and Cold War which has left a legacy of unexploded ordnance in the area. This, combined with the sensitive shingle habitats, results in much of the shingle area being prohibited from access for National Trust staff and visitors.

Awarded funding has previously helped facilitate projects including the LIFE+ Nature Project: The Alde-Ore Estuary - Securing a sustainable future for wildlife (LIFE08 NAT/UK/000199) which ran from April 2010 to March 2014. An objective of this project was to develop and implement a system to protect shingle habitats and species by managing unauthorised access. This system had 'some success...but will involve continuing development, monitoring and input'. [31] This plan included the formation of a Working Group, open day visits to the site for local communities, and robust signage and interpretation installed at key points on the spit at Orford Ness, 'designating crossing points to the sea as permissive paths and communicating the issues to members of the public and asking for their support. Early indications are promising and monitoring will continue' [31].

An After-LIFE Conservation Plan outlines site aims for the 5-10 years following the project [31] its objectives towards access on the spit are to encourage safe and sustainable use of the site by the public. To continue to monitor visitor numbers and distribution to ensure no negative impacts. To encourage locals to become volunteers and to continue regular liaison with local communities and interest groups. Continue to progress work completed successfully under the LIFE+ project by



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carrying out regular patrols and engagement with user groups to manage unauthorised access causing damage and disturbance to habitats and wildlife. The 2014 After LIFE conservation plan stated the intention to employ a Community Ranger for three years to undertake this work.

Structures including the Cobra Mist buildings and the pagodas remain on the Ness; which attract visitors although are inherently dangerous. Gulls are now seen to nest on the roof of the main Cobra Mist building and in 2017, 19 lesser black-backed gulls nested on the pagoda structures. During this season the majority, 213 pairs, nested on the Lantern Marshes, a large increase on the 76 recorded on Lantern Marshes in 2015 [53]. However despite the higher numbers in 2017 the breeding success was disappointing, perhaps due to predation from brown rats. In 2012 640 pairs of lesser black-backed gulls were recorded on Orford Ness [54], but by 2019 this dropped to just 52 pairs, all on the building roofs (Suffolk Bird Report 2019).

Work has been undertaken on Orford Ness to create suitable habitat for avocet on Orford Ness including scrape creation and predator control introduced in 2016 [2]. In 2017 a minimum of 35 pairs nested on Orford Ness, compared with 39 pairs in 2016 and 52 pairs in 2015. In 2017 14 pairs were seen at the Airfields, 17 pairs on Kings Marsh and 4 pairs on Lantern Marsh although birds were observed to move sites, particularly after nesting attempt failure. At least 20 young were known to have fledged, the most for many years [53].

Ruff have been recorded here (near Kings Marshes) and in 2010/11 they were only recorded here within the Alde-Ore Estuary SSSI and SPA site, with a peak count of 4 [2].

Little terns have previously nested on Orford Ness including at Sudbourne Beach, and at the distal end of the spit. Predation has been an issue in the past and they are not known here at present, with the last breeding record from 2013 [53].

Just south of Kings Marshes is a redshank and avocet high tide roost (year round). Marsh harrier use Kings Marshes where a pair nested in 2016 although this failed [40]. One pair of marsh harrier nested in the Chantry reedbed (on the nearby mainland) in 2017 but failed to produce any young [53]. They were also recorded as present overwinter in 2016 and 2017 [40] [39].

Breeding redshank use the area to the east of Kings Marshes. In 2017 a minimum of 39 breeding pairs were noted, compared to 37-40 pairs in 2016. The main concentration was on the Airfields with others at Lantern Marshes. At least 20 young fledged [53].

During the 2017 breeding season a minimum of 20 breeding pairs of shelduck were confirmed. 20 broods produced 163 ducklings and at least 90 of these are known to have fledged. No wigeon or pintail were seen. There was no breeding activity from teal or shoveler although 1-2 pairs were seen in the area. One pair of shoveler bred on Orford Ness in 2012 [54].

Saltmarsh elements are present at Orford Ness and the lagoons of Kings Marsh include the rare tassel pondweeds *Ruppia spiralis* and *R. maritima* (SSSI citation). The After LIFE Conservation Plan outlined an aim to maintain the extent of the saltmarsh habitat at >166.7 ha, and keep the habitat undisturbed.



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The Starlet sea anemone *Nematostella vectensis* is present within the lagoon features on Orford Ness, which protected under Schedule 8 of the Wildlife and Countryside Act 1981.

Vegetated shingle habitat to be maintained at its current extent is an outlined objective within the After LIFE Conservation plan for Orford Ness. The distribution and abundance of key plant species (*Vicia lutea*, *Lathyrus japonicus* & *Limonium binervosum*) and key invertebrate species is to be maintained. The distribution and abundance of *Spartina maritima* and sea barley (*Hordeum marinum*) is to be maintained.

### Detailed design and assessment of risk

Access is currently low on Orford Ness and it is managed by the National Trust, with some access by licenced fishermen at the north end from Slaughden. We anticipate a small increase in usage of the trail at the northern end of Orford Ness, a possible increase in Orford Ness beach where access already occurs to some extent, and a negligible increase in use of Orford Ness as a whole.

Access to the coastal margin will be restricted to people without dogs on marked routes on Orford Ness. This is proposed under Section 24 of the Countryside and Rights of Way Act (2000) for the purpose of land management, to enable the National Trust and the Orford Lighthouse Trust to continue to manage this visitor attraction for public access.

Orford Ness is a complex site with various concerns that could be impacted from the introduction of coastal access rights, as follows:

- Areas of saltmarsh and mud unsuitable for general public access.
- Public safety concerns from unexploded ordnance.
- Concerns with damage from recreational access to vegetated shingle.
- Concerns with disturbance from recreational access to breeding and wintering birds.

The exclusion of coastal access rights on the Ness for the purpose of land management replicates existing visitor management, to enable the National Trust to continue managing the site in a practical way. The restriction also has the effect of preventing access to areas of saltmarsh and mud unsuitable for general public access, protecting the public from any risks from unexploded ordnance, and protecting the notified features from damage or disturbance from the general public.

The three existing short permissive routes across the spit at the southern end will have coastal access rights year round to people without dogs. Existing visitor management allowing seasonal access to permissive routes from the jetty and slipway on the Ness will continue as they do now, without any additional coastal access rights. Public rights of way are unaffected by restrictions.

These access restrictions and exclusions have been proposed following discussions with site staff. The existing visitor management practises on the site will continue effectively unchanged in light of the new Coastal Access rights.



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Disturbance to the non-breeding wetland bird assemblage; Non-Breeding Wetland Bird Assemblage; Breeding Gull Assemblage; Breeding Avocets and Terns; Breeding Marsh Harrier; Trampling of the Coastal Plant Assemblage; Coastal Lagoons

This Nature Reserve will continue to be managed as it is at present, therefore we do not anticipate any additional risks to these features as a result of our proposals. Dogs are not permitted in the area.

Trampling of Aquatic Invertebrates; Trampling of Fresh/brackish Aquatic Plant Assemblage

As above, existing management including the exclusion of dogs will continue. We are proposing s25A access exclusions on areas unsuitable for public access. We do not anticipate any additional risks to these features as a result of our proposals. Dogs are not permitted in the area.

Trampling of the Vegetated Shingle; Shingle & Tidal Litter Invertebrate Habitat

We do not anticipate that levels of use across Orford Ness will change as a result of these proposals. The existing management practises on the site are not expected to change. The spit provides no through-route and the shingle presents difficult walking terrain, combined with the 'no access' sign at the northern end, these will continue to deter access. Therefore with respect to increased usage from the north we do not consider there to be any additional risks.

There are currently three well-demarked routes across the shingle at the southern end of Orford Ness which have historically been used recreationally by those who have sailed from the mainland and who moor their boats on the northern side of Orford Ness and walk across the shingle to access the beach on the southern side. These walked routes are managed as permissive routes by the National Trust. Increase as a result of the Coast Path is expected to be negligible, due to the complication of getting a boat to the site.

We therefore do not consider there to be a significant risk to these features at this location.

### **D3.2K Havergate Island**

As it is not accessible on foot, and is therefore not 'in scope' for Coastal Access, the island can be ruled out of this HRA.

### **D3.3 Assessment of potentially adverse effects (taking account of any additional mitigation measures incorporated into the design of the access proposal) alone**

**Table 9: Summary of Appropriate Assessment**

Risk to conservation objectives	Relevant design features of the access proposal	Can ‘no adverse effect’ on site integrity be ascertained?	Residual effects?
<p>Non-breeding wetland bird assemblage-through disturbance</p>	<p>Many parts of the route are aligned along existing coastal access routes including PRoWs and the Suffolk Coast Path.</p> <p>It is likely that the summer months will see the highest proportion of path users.</p> <p>Over large parts of the route around the Butley Estuary an alternative route is proposed which will take walkers away from the sea wall, thus reducing the likelihood of disturbing birds seawards of the path.</p> <p>A year round dogs to leads restriction is proposed on an exposed part of the Butley Estuary route which is close to the water.</p> <p>Interpretation panels around the Butley River and the Alde Ore Estuary will inform walkers of the wildlife sensitivity of the area.</p> <p>Brash will be used to block worn routes through the reedbeds at Iken Cliffs in order to prevent access, particularly by dogs, which causes bird disturbance.</p> <p>Interpretation panels around the Alde-</p>	<p><b>Yes</b></p>	<p><b>Yes</b></p> <p>A residual risk is concluded for the Butley River, as the alignment here includes some new access.</p>





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Risk to conservation objectives	Relevant design features of the access proposal	Can 'no adverse effect' on site integrity be ascertained?	Residual effects?
	Ore Estuary will inform visitors to the wildlife sensitivity of the area.		
Breeding gull assemblage- through disturbance	<p>The main breeding locations for gulls are on Havergate Island, which is not impacted by our proposals, and Orford Ness.</p> <p>Through the use of s25A restrictions to complement the existing management practises on the site (i.e. a locked gate with signage, and at times the presence of wardens) we do not anticipate a change in use across Orford Ness.</p>	<p><b>Yes</b></p> <p>We expect that the existing use of Orford Ness will not change as a result of our proposals.</p>	<p><b>No</b></p>
Breeding avocets and terns- through disturbance	<p>Breeding avocet are present south of Shingle Street but we anticipate a small relative increase of path users along this stretch of PRow, where there are few attractors into the coastal margin and the presence of wet ground may deter dog owners from allowing their dogs into the coastal margin.</p> <p>There is no longer a regular colony of breeding terns at this site.</p> <p>Existing signage at the site warns path users of the possible presence of ground-nesting birds.</p> <p>There is no additional access to the Hollesley, Boyton or Hazlewood Marshes where there are avocet breeding sites.</p> <p>Site management at Orford Ness is not anticipated to change.</p>	<p><b>Yes</b></p>	<p><b>Yes</b></p> <p>Avocet have been recorded breeding near Shingle Street, despite existing signage and our proposed alignment on a PRow we are taking a precautionary approach by concluding a residual insignificant effect which has the potential to act in-combination with other plans or projects in the area.</p>
Breeding marsh harrier-	Marsh harrier have attempted to breed on the upper Butley river, however we	<p><b>No</b></p>	<p><b>No</b></p>



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Risk to conservation objectives	Relevant design features of the access proposal	Can ‘no adverse effect’ on site integrity be ascertained?	Residual effects?
through disturbance	<p>are not proposing any access over the areas of saltmarsh and reedbed unsuitable for access.</p> <p>Land near to the Iken seawall has also been used as a breeding site, however the path alignment here is well inland and access to the marshes (in the coastal margin) will be restricted.</p>		
Heathland and ground nesting birds – through disturbance	<p>The alignment at Snape Warren Open Access land has been designed to present minimal risks to these features. The alignment is on a well-walked path which will be waymarked. There are few attractors into the coastal margin (plus the margin to the south of the New England Farm arable fields will be restricted).</p> <p>Existing management on the site is not expected to change.</p>	<p><b>No</b></p> <p>We are aligning on existing managed Open Access land on a well-waymarked path. Signage encourages walkers to keep dogs to leads and advises of the wildlife interest. There are few attractors into the coastal margin.</p>	<p><b>No</b></p> <p>Trails around this area are promoted by the AONB and this is an area of Open Access land, on which signage indicates that dogs should be kept on leads.</p>
Coastal plant assemblage – through trampling	<p>Much of the route alignment is on a clearly demarked seawall which will be well waymarked, and much of the seawards coastal margin is covered by an s25A access exclusion.</p> <p>This applies to the areas of new access proposed at the Butley Estuary.</p>	<p><b>Yes</b></p> <p>The nature of these proposals will not require any significant loss of this feature group.</p>	<p><b>No</b></p>
Vegetated shingle –	<p>We anticipate a negligible increase in use of the coastal margin at Shingle Street, and are clearly waymarking the trail</p>	<p><b>Yes</b></p>	<p><b>Yes</b></p> <p>This is a key feature of Shingle</p>



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Risk to conservation objectives	Relevant design features of the access proposal	Can ‘no adverse effect’ on site integrity be ascertained?	Residual effects?
through trampling	<p>which lies landwards of the expanse of shingle.</p> <p>We do not anticipate a change in management at Orford Ness.</p>		<p>Street, so although we anticipate a negligible increase in use of the coastal margin we have conservatively concluded a residual risk to this feature at this location.</p>
Shingle & Tidal Litter Invertebrates	<p>At Shingle Street we anticipate a negligible increase in use of the coastal margin and due to the mobile nature of these species we do not consider that trampling presents an appreciable risk.</p> <p>At Orford Ness we do not anticipate a change to the current management practices.</p>	<b>Yes</b>	<b>No</b>
Aquatic Invertebrates-through trampling	<p>Saline lagoons are found at Shingle Street where we are aligning on the Suffolk Coast Path with a negligible increase in use of the coastal margin.</p> <p>On Orford Ness we anticipate no change to existing management.</p>	<b>Yes</b>	<b>No</b>
Fresh/brackish Aquatic Plant Assemblage-through trampling	<p>These features are found in the coastal margin at Shingle Street, where the alignment is along the Suffolk Coast Path and a negligible increase in use of the coastal margin is anticipated.</p>	<b>Yes</b>	<b>No</b>
Coastal lagoons – saline lagoon margins –	<p>As above, these features are noted at Shingle Street where we are aligning on the Suffolk Coast Path, and at Orford</p>	<b>Yes</b>	<b>No</b>



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Risk to conservation objectives	Relevant design features of the access proposal	Can ‘no adverse effect’ on site integrity be ascertained?	Residual effects?
through trampling	Ness where existing management is not expected to change.		
Installation of infrastructure-through disturbance to birds	Infrastructure will be installed to minimise disturbance to birds, as outlined in table 7 above. Appropriate SSSI consents will be obtained where necessary.	Yes	No

**Conclusion:**

The following risks to achieving the conservation objectives identified in D1 are effectively addressed by the proposals and no adverse effect on site integrity (taking into account any incorporated mitigation measures) can be concluded:

- Breeding gull assemblage - through disturbance
- Breeding marsh harrier – through disturbance
- Heathland and ground nesting birds – through disturbance
- Coastal plant assemblage – through trampling
- Aquatic invertebrates - through trampling
- Fresh/brackish Aquatic Plant Assemblage - through trampling
- Coastal lagoons – saline lagoon margins – through trampling
- Installation of infrastructure - through disturbance to birds

The following risks to achieving the conservation objectives identified in D1 are effectively addressed by the proposals and no adverse effect on site integrity (taking into account any incorporated mitigation measures) can be concluded, although there is some residual risk of insignificant impacts:

- Non-breeding wetland bird assemblage - through disturbance. Around the Butley River.
- Breeding avocets - through disturbance at Shingle Street.
- Vegetated shingle - through trampling at Shingle Street.

## **D4 Assessment of potentially adverse effects considering the project ‘in-combination’ with other plans and projects**

The need for further assessment of the risk of in-combination effects is considered here.

Natural England considers that it is the appreciable effects (from a proposed plan or project) that are not themselves considered to be adverse alone which must be further assessed to determine whether they could have a combined effect significant enough to result in an adverse effect on site integrity.

### **Step 1 – Are there any appreciable risks from the access proposals that have been identified in D3.3 as not themselves considered to be adverse alone?**

Natural England considers that in this case the potential for adverse effects from the plan or project has not been wholly avoided by the incorporated or additional mitigation measures outlined in section D3. It is therefore considered that there are residual and appreciable effects likely to arise from this project which have the potential to act in-combination with those from other proposed plans or projects. These are:

- Non-breeding wetland bird assemblage- through disturbance. Specifically at the Butley River as some new access is proposed here.
- Breeding avocets- through disturbance at Shingle Street.
- Vegetated shingle- through trampling at Shingle Street.

### **Step 2 – Have any combinable risks been identified for other live plans or projects?**

**Table 10: Review of other live plans and projects**

<b>Competent Authority</b>	<b>Plan or project</b>	<b>Have any insignificant and combinable effects been identified?</b>
East Suffolk Council	Emerging Suffolk Coastal Local Plan 2018-2036	<b>No.</b> The appropriate assessment associated with this plan considers the risk of recreational pressure to qualifying features of all European sites and concludes that reliance can be placed on mitigation (Refs [55] & [26]). A Recreational disturbance Avoidance Mitigation Strategy (RAMS) has been developed to be implemented over the planning period that incorporates SANG (Suitable Alternative Natural Greenspace) and SAMM (Strategic Access Management and Monitoring) designed to avoid effects of increased visitors and urbanisation which arise from additional housing near European sites. As a result the Appropriate Assessment concludes no adverse effect alone or in combination.



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Competent Authority	Plan or project	Have any insignificant and combinable effects been identified?
East Suffolk Council	East Suffolk Business Plan	<p><b>No.</b> Developed by the East Suffolk Council this plan will sit alongside the Local Plans and the associated Recreational disturbance Avoidance Mitigation Strategy (RAMS).</p> <p>This joint plan brings together the business plans of the Suffolk Coastal and Waveney District Councils to ensure high quality frontline services are maintained, while controlling the costs to our communities [56].</p> <p>Some of the outlined plans across the whole of East Suffolk include:</p> <ul style="list-style-type: none"> <li>• Support the development of a single footpaths service across Suffolk.</li> <li>• Increase visitor numbers to East Suffolk outside of the main tourist seasons.</li> <li>• Continue to support the Suffolk Coast Destination Management Organisation to develop and sustain local tourism.</li> </ul> <p>This plan identifies opportunities for businesses and economic growth with a target is to increase productivity performance by 1.75% per annum between 2018 and 2023.</p>
East Suffolk Council	East Suffolk Growth Plan 2014 – 2025	<p><b>No.</b> Developed by the East Suffolk Council this plan will sit alongside the Local Plans and the associated Recreational disturbance Avoidance Mitigation Strategy (RAMS).</p> <p>This plan aims to support entrepreneurs and entrepreneurship in East Suffolk, encouraging established businesses to invest and grow and attracting inward investment to East Suffolk, focused around existing and emerging sectors and supply chains [57]. This document makes reference to the local plans in the area.</p>
The Suffolk Coast and Heaths Areas of Outstanding Natural Beauty (AONB) Partnership	Suffolk Coast & Heaths Area of Outstanding	<p><b>No.</b> This plan supports tourism where it is inclusive, sustainable and supports the purpose of the designation. The England Coast Path proposals promote responsible access through the use of clear signage &amp; interpretation</p>



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Competent Authority	Plan or project	Have any insignificant and combinable effects been identified?
	Natural Beauty (AONB) Management Plan 2018 -23	<p>panels where appropriate. Any limited infrastructure associated with this stretch of the coast path will be designed with consideration to the aesthetics of the local area.</p> <p>These proposals have been developed with regard to the Suffolk Coast &amp; Heaths AONB Partnership Position Statement (December 2018): England Coast Path [46]. This includes reference to indicators of natural beauty specific to the Suffolk Coast and Heaths AONB [58]. We do not consider that our proposals will adversely affect these indicators of local natural beauty and there are no combinable risks.</p>
The Environment Agency	Shoreline Management Plan 7 Lowestoft Ness to Landguard Point	<p><b>No.</b></p> <p>A Shoreline Management Plan (SMP) is a large-scale assessment of the risks associated with coastal processes which seeks to reduce these risks to people and the developed, historic and natural environments. As policies within the SMP will create adverse effects on sites of international nature conservation importance, it was necessary to prepare a Statement of Case (SoC) for Imperative Reasons of Overriding Public Interest (IROPI) for approval by the Secretary of State for Environment, Food and Rural Affairs. This provides evidence that no feasible alternatives exist and that compensatory measures are secured. Subsequently the SMP was formally adopted by the operating authorities and published in Spring 2012 [59].</p> <p>A Hold the Line management approach is adopted at Slaughden and management has included the recycling of shingle from further south on Orford Ness into this area [60]. As these England Coast Path proposals do not anticipate any changes to the existing management practises on Orford Ness, these works pose no in-combination risks.</p>
The Environment Agency	East Suffolk	<b>No.</b>

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Competent Authority	Plan or project	Have any insignificant and combinable effects been identified?
	Catchment Flood Management Plan December 2009	This catchment flood management plan assesses the risk of flooding across the East Suffolk Catchment. This stretch falls within the Suffolk Coast and Heaths sub-area which is assigned Policy 2 – ‘Areas of low to moderate flood risk where we can generally reduce existing flood risk management actions’. Therefore no additional risks to European protected sites from flood defences are anticipated as a result of this plan.
The Alde-Ore Estuary Partnership	The Alde and Ore Estuary Plan	<p><b>No.</b></p> <p>The Alde-Ore Estuary Plan aims addresses management of the estuary as a whole, its strategic aims being to sustain or enhance the features of the estuary area. This includes planning to ensure the flood and river defences of a standard that will withstand overtopping without breaching during a tidal surge of a 1 in 200 year frequency given the sea level rise predicted up to the year 2050. A rolling programme of works developed in association with the EA will assist in achieving this aim.</p> <p>At present the Partnership is undergoing a project to upgrade parts of the seawall. Phase 1 of the Aldeburgh Town Marsh was completed in 2017 with 1.5km of river wall upgraded. Phases 2 and 3 are scheduled for 2020/2023.</p> <p>The Appropriate Assessment of the Habitats Regulations Assessment (revised draft III) [50] concluded that there will be no adverse effect on the integrity of the European designated sites at plan stage. This is subject to the Partnership conducting a formal monitoring and review programme for the Estuary, and entering into a commitment with the Alde and Ore Estuary Plan to provide suitable replacement habitat if a need is identified. Details of the monitoring programme are published within the Strategic Environmental Assessment Report (SEA) [61].</p> <p>The HRA produced at project stage [62] stated temporary closures of the Aldeburgh Marshes seawall will be required. Walkers will be directed onto other footpaths which have a lower potential environmental sensitivity.</p>





**Assessment of Coastal Access proposals under  
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Habitats Regulations 2017 (as amended)  
(‘Habitats Regulations Assessment’)**

Competent Authority	Plan or project	Have any insignificant and combinable effects been identified?
		<p>The project-level stage HRA outlines that mitigation will be required for breeding marsh harrier and avocet, thus identifying a likely significant effect to these species. Suitable mitigation measures will be agreed with Natural England prior to works commencing and may include pre-construction surveys, a watching brief during the breeding bird season and the application of exclusion zones around nest sites if they are encountered [62]. At the time of writing there are no potential residual risks from this project to assess.</p>
Deben Estuary Partnership	Deben Estuary Plan	<p><b>No.</b></p> <p>This aims to set out how flood risk can be managed but also ways in which the interrelated benefits, challenges and threats to the estuary and its hinterland relate to the sustainability of the wider area.</p> <p>The Deben Estuary is outwith these project proposals. The only section within the scope of this plan is along part of Ferry Road at Bawdsey, on the Suffolk Coast Path. This does not fall within a European designated site.</p>
Natural England	Implementation of Coastal Access Rights from Aldeburgh to Hopton-on-Sea	<p><b>Yes</b></p> <p>This stretch of coast path was published in late January 2020 [63]. The habitats regulations assessment for this project identified the following residual risks:</p> <ul style="list-style-type: none"> <li>• Disturbance to individual breeding bird species - at Pottersbridge Marshes through disturbance from path users on the Easton Broad OAR.</li> <li>• Disturbance to individual breeding bird species – to nesting little terns at Covehithe Broad.</li> <li>• Disturbance to individual breeding bird species – to nesting little terns at Kessingland Beach.</li> <li>• Loss of SPA supporting habitat – due to the installation of the pedestrian gate and fencing at Easton Wood, the installation of the post and rope guide fence on the shingle at the Dingle Marshes foreshore, and clearance of vegetation at the Easton Broad OAR.</li> </ul>



**Assessment of Coastal Access proposals under  
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Competent Authority	Plan or project	Have any insignificant and combinable effects been identified?
Natural England	Implementation of Coastal Access Rights from Felixstowe Ferry to Bawdsey	<p><b>No.</b> The habitats regulations assessment for this project did not identify any significant or residual risks as a result of the project proposals. There are no combinable risks to assess in relation to this stretch of coast path.</p>
Secretary of State for Business, Energy and Industrial Strategy	Sizewell C nuclear power station	<p><b>No.</b> The development of Sizewell C has the potential for recreational impacts on European designated sites nearby. The closure of existing walked routes along the beach frontage and Sizewell Marshes SSSI is expected to displace local users to other locations for recreation, including European designated sites.</p> <p>As a result, a recreational management and monitoring strategy is being devised, in partnership with relevant stakeholders. The strategy includes the provision and promotion of ‘on-site’ alternative greenspace within / in close proximity to the main development site and strategic ‘off-site’ measures to make the designated sites more resilient to changes/increases in recreational pressures (e.g. visitor engagement, education and information, access management etc.) arising from the proposed development. We anticipate that the pending mitigation package will allow a conclusion of no adverse effect, both alone and in combination with other live plans or projects, from recreational impacts in relation to this project. We are unable to assess this project further at time of writing although will work collaboratively with developers to ensure potential environmental effects are minimised.</p>
CODE Development Planners Ltd	Adastral Park Development DC/17/1435/OUT	<p><b>No.</b> Outline planning application for up to 2000 dwellings an employment area of c0.6ha, a school, green infrastructure (including Suitable Accessible Natural Greenspace (SANGs), outdoor play areas, sports ground and allotments/community orchards), public footpaths and cycleways, vehicle accesses and associated infrastructure.</p>

## Assessment of Coastal Access proposals under regulation 63 of the Habitats Regulations 2017 (as amended) ('Habitats Regulations Assessment')

Competent Authority	Plan or project	Have any insignificant and combinable effects been identified?
		<p>This proposed development is located over 10km inland from Bawdsey, a significant distance from our coast path proposals.</p> <p>It is concluded that with the intended measures in place, and from adherence to the Construction Environmental Management Plan (CEMP) designed for the site, the proposed development may be constructed without significant long-term adverse effects on the immediate and wider environment [64].</p>
East Anglia Offshore Wind - East Anglia ONE Ltd	East Anglia ONE offshore windfarm	<p><b>No.</b></p> <p>East Anglia ONE Ltd were granted a development consent order in June 2014 for East Anglia ONE offshore wind farm, a 1200MW offshore windfarm and associated infrastructure. In 2015 the project was scaled down to 714MW. Construction began in 2018, first power has been generated and project completion is expected during 2020. The landfall site is at Bawdsey.</p> <p>The Ecological Management Plan [65] outlines mitigation measures including scrub clearance to be undertaken outside of the breeding season (February to August). Other mitigation includes pre-construction surveys, targeted habitat management, and the use of visual and acoustic screening during construction phases.</p> <p>The Ecological Statement Summary [66] describes some temporary effects from the landfall and onshore cabling routes including a 'negative impact significant at local level' to wintering birds. The construction phase is not anticipated to overlap with these Coast Path establishment phase and therefore this does not produce a combinable risk.</p>
East Anglia Offshore Wind	East Anglia THREE	<p><b>Yes.</b></p> <p>This project received planning consent in August 2017 and construction is due to commence in 2021. Whilst the landfall site at Bawdsey and the onshore cabling route does not overlap a European designated site, due to its</p>



**Assessment of Coastal Access proposals under regulation 63 of the Habitats Regulations 2017 (as amended) ('Habitats Regulations Assessment')**

Competent Authority	Plan or project	Have any insignificant and combinable effects been identified?
		<p>proximity to our proposals potential combinable risks are assessed here.</p> <p>The Environmental Statement Chapter discussing onshore ornithology states: “The majority of construction works and therefore disturbance risks will be associated with East Anglia ONE, and although potential for continued disturbance exists in consecutive years for the proposed East Anglia THREE and a future East Anglia project, this will be of notably lesser magnitude [67].”</p> <p>This document assesses the cumulative construction impacts for East Anglia ONE, the proposed East Anglia THREE project and a future East Anglia Offshore Wind project [67].</p> <p>The cumulative impact magnitude via temporary disturbance and displacement is considered negligible for all species assessed and this risk is therefore not considered further (Table 24.17, [67]).</p> <p>The temporary cumulative habitat loss risk as assessed as having a negligible impact for brent goose and Cetti’s warbler. For wildfowl &amp; waders there is no anticipated change. For breeding marsh harrier, shelduck and teal* the impact magnitude is low (Table 24.16, [67]) therefore these will be considered further.</p> <p>*Note- shelduck and teal form part of the ‘breeding bird’ group. From the species list for this group, the only species of relevance to this report with confirmed breeding were shelduck, and teal for which possible breeding was recorded. Marsh harrier were also confirmed to be breeding.</p>



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Competent Authority	Plan or project	Have any insignificant and combinable effects been identified?
East Anglia Offshore Wind	East Anglia TWO	<p><b>No.</b> The planning consent decision is expected in Spring 2021. If successful the earliest project construction would be in 2024 with completion in 2030.</p> <p>The landfall location and associated infrastructure are proposed northwards of this stretch between Thorpeness and Sizewell [68].</p> <p>The information to support the Habitats Regulations Assessment does not anticipate any adverse risks to onshore European designated sites. However as this project is still within the development phase we cannot further assess combinable risk [69].</p>
East Anglia Offshore Wind	East Anglia ONE North	<p><b>No.</b> A planning consent decision is expected in 2021. If successful, the earliest project construction would be in 2025.</p> <p>The landfall location and associated infrastructure are proposed northwards of this stretch between Thorpeness and Sizewell.</p> <p>A package of mitigation measures are outlined which enables a conclusion of no adverse effect to onshore European protected sites [70]. However as this project is still within the development phase we cannot further assess combinable risk.</p>

## Assessment of Coastal Access proposals under regulation 63 of the Habitats Regulations 2017 (as amended) ('Habitats Regulations Assessment')

Competent Authority	Plan or project	Have any insignificant and combinable effects been identified?
The National Trust	DC/19/2303/FUL Installation of ground mounted solar photovoltaic panels to existing hardstanding and installation of inverters, mobile generator and fuel bowser and associated infrastructure on land at Orford Ness	<p>Planning permission for this project was granted in September 2019. This project will take place on Orford Ness, where we do not propose any changes in access.</p> <p>The Habitats Regulations Assessment states that works will be carried out at the optimum time of year (September) to reduce any visual disturbance to overwintering birds. There are no likely significant effects or residual effects concluded as a result of this project, either alone or in-combination with other projects.</p>

In light of this review, we have identified insignificant and combinable effects are likely to arise from the following projects that have the potential to act in-combination with the access proposals:

- Implementation of coastal access from Aldeburgh to Hopton-on-Sea.
- Construction of East Anglia Three – temporary cumulative habitat loss to marsh harrier and breeding birds, specifically shelduck and teal.

### Step 3 – Would the combined effect of risks identified at Steps 1 and 2 be likely to have an adverse effect on site integrity?

In light of the conclusions of Steps 1 & 2, we have made an assessment of the risk of in combination effects. The results of this risk assessment, taking account of each qualifying feature of each site and in view of each site's Conservation Objectives, are as follows:

**Table 11: Assessment of Combined Risks with other Plans or Projects**

Residual Risk	In-Combination Effect	Assessment of risk to site conservation objectives	Potential Adverse Effect?
The establishment of the England Coast Path stretch from Aldeburgh to Hopton-on-Sea, which was published in January 2020,	There is a risk that effects considered residual for one stretch are exacerbated when combined with these proposals, becoming a significant risk.	<p>Across both stretches of the coast path we have considered mitigation which will best protect the interest features of the site.</p> <p>Disturbance to breeding birds at Pottersbridge will not impact the non-breeding wetland bird</p>	<b>No.</b> The implementation of coastal access between Aldeburgh and Hopton-on-Sea will not adversely

## Assessment of Coastal Access proposals under regulation 63 of the Habitats Regulations 2017 (as amended) ('Habitats Regulations Assessment')

Residual Risk	In-Combination Effect	Assessment of risk to site conservation objectives	Potential Adverse Effect?
adjacent to this stretch from Bawdsey to Aldeburgh, could result in a higher frequency of interactions between people using the coast path and waterbirds close to the shore during the breeding and overwintering periods.		<p>population on BSA due to spatial separation and the fact that the sensitive time period does not overlap.</p> <p>Disturbance at Pottersbridge will not impact breeding avocets or breeding marsh harrier on this stretch, due to the spatial separation between these sites with suitable habitat in the vicinity.</p> <p>Nesting little terns on the AHS stretch will not be impacted by our proposals on this stretch, the regular breeding colony of little terns was last recorded in 2013.</p> <p>Loss of SPA supporting habitat between Aldeburgh and Hopton-on-Sea due to the installation of infrastructure will not be exacerbated by this project, as waymarkers and other infrastructure are to be installed on the walked routes therefore minimising any habitat loss.</p>	affect the birds at residual risk as identified within these proposals.
Displacement from the construction works from East Anglia Three could result in breeding birds moving closer to the coast path proposals.	The combined effect of displacement from works associated with East Anglia Three and disturbance events associated with these coast path proposals at the Butley River for marsh harrier and at Shingle Street for avocet could reduce the breeding fitness of these species.	The landfall and onshore cable route falls outwith the Alde-Ore Estuary SPA and lies closer to the Deben Estuary SPA for which marsh harrier and breeding avocet are not designated. Given the measures proposed in table 7 above to minimise disturbance to bird interest during installation of the infrastructure associated with these proposals, combined with the spatial separation between these projects and availability of similar habitat in the vicinity, there is not considered	<b>No.</b>



## Assessment of Coastal Access proposals under regulation 63 of the Habitats Regulations 2017 (as amended) ('Habitats Regulations Assessment')

Residual Risk	In-Combination Effect	Assessment of risk to site conservation objectives	Potential Adverse Effect?
		<p>to be a significant risk from this potential in-combination effect.</p> <p>No residual effect is determined for non-breeding birds and therefore these are not likely to be affected by this in-combination risk.</p>	

### D5. Conclusions on Site Integrity

Because the plan/project is not wholly directly connected with or necessary to the management of the European site and is likely to have a significant effect on that site (either alone or in combination with other plans or projects), Natural England carried out an Appropriate Assessment as required under Regulation 63 of the Habitats Regulations to ascertain whether or not it is possible to conclude that there would be no adverse effect on the integrity of a European Site(s).

**Natural England has concluded that:**

It can be ascertained, in view of site conservation objectives, that the access proposal (taking into account any incorporated avoidance and mitigation measures) will not have an adverse effect on the integrity of the Alde-Ore Estuary Ramsar, Alde-Ore Estuary Special Protection Area (SPA), Outer Thames Estuary SPA, Sandlings SPA, Alde-Ore & Butley Estuaries Special Area of Conservation (SAC), Orfordness-Shingle Street SAC and the Southern North Sea SAC either alone or in combination with other plans and projects.





## Assessment of Coastal Access proposals under regulation 63 of the Habitats Regulations 2017 (as amended) ('Habitats Regulations Assessment')

### PART E: Permission decision with respect to European Sites

Natural England has a statutory duty under section 296 of the Marine and Coastal Access Act 2009 to improve access to the English coast. To fulfil this duty, Natural England is required to make proposals to the Secretary of State under section 51 of the National Parks and Access to the Countryside Act 1949. In making proposals, Natural England, as the relevant competent authority, is required to carry out a HRA under Regulation 63 of the Habitats Regulations.

We, Natural England, are satisfied that our proposals to improve access to the English coast between Bawdsey and Aldeburgh are fully compatible with the relevant European site conservation objectives.

It is open to the Secretary of State to consider these proposals and make a decision about whether to approve them, with or without modifications. If the Secretary of State is minded to modify our proposals, further assessment under the Habitats Regulations may be needed before approval is given.

### Certification

<b>Assessment prepared by:</b>	Mary Andrew & Adam Gretton	<i>On behalf of the Coastal Access Programme Team</i>
<b>Date:</b>	15/1/21	
<b>HRA approved by:</b>	Kate Waterfield	<i>Senior officer with responsibility for protected sites</i>
<b>Date:</b>	20/1/21	



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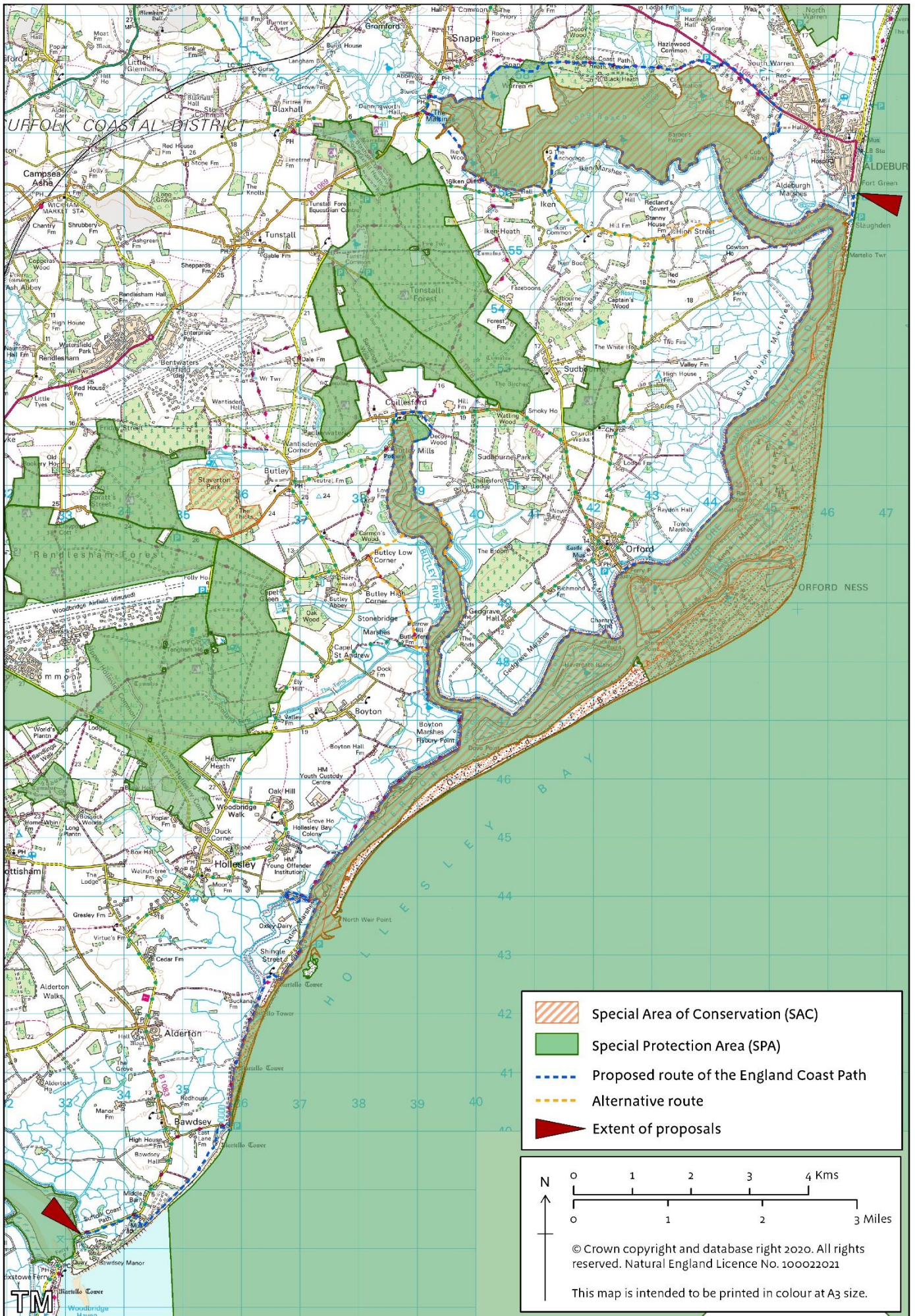


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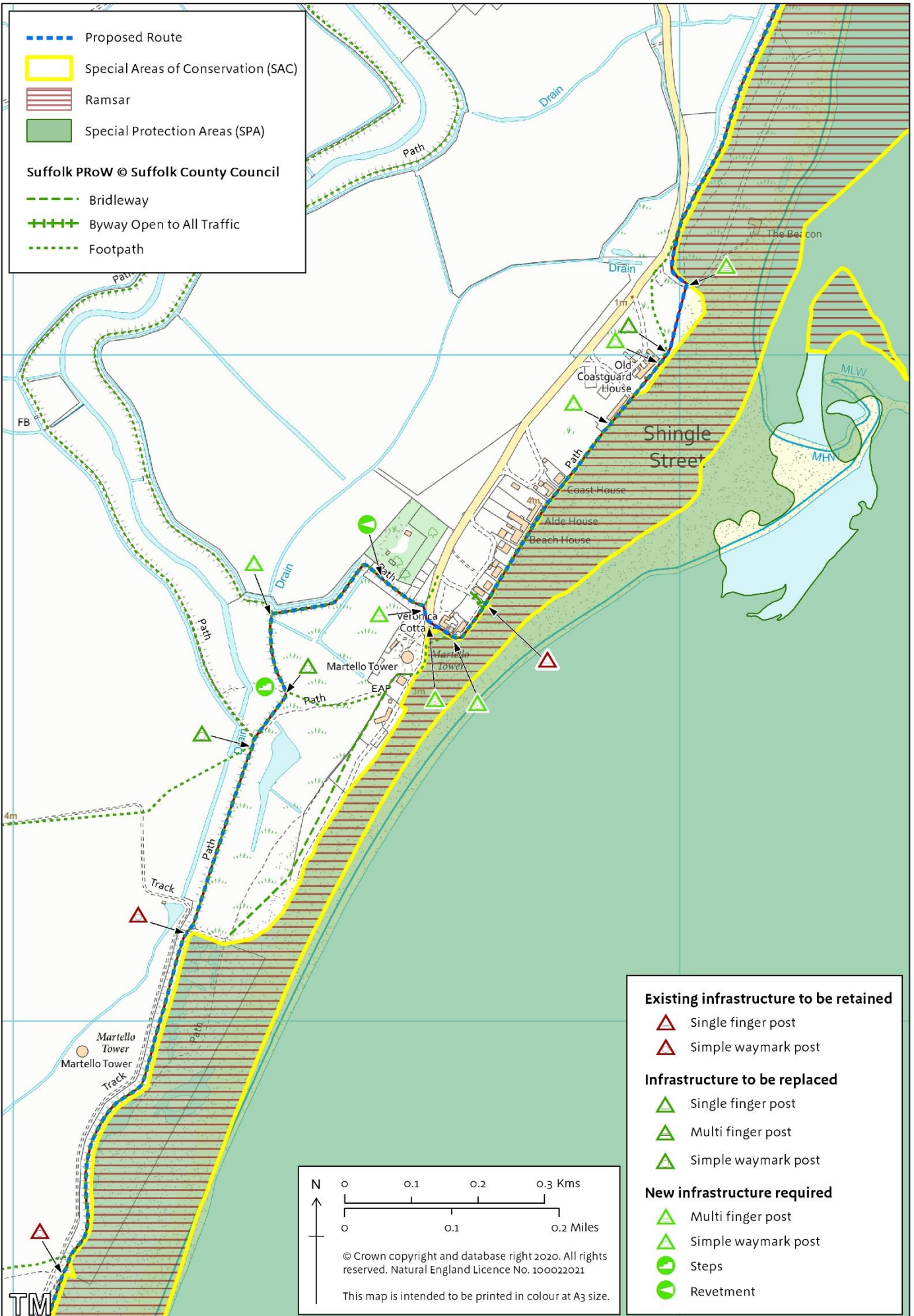
Map 1 - Extent of the Alde-Ore & Butley Estuaries' SPA and SAC (Natura 2000) sites



Map 2 - Overview of HRA key site locations

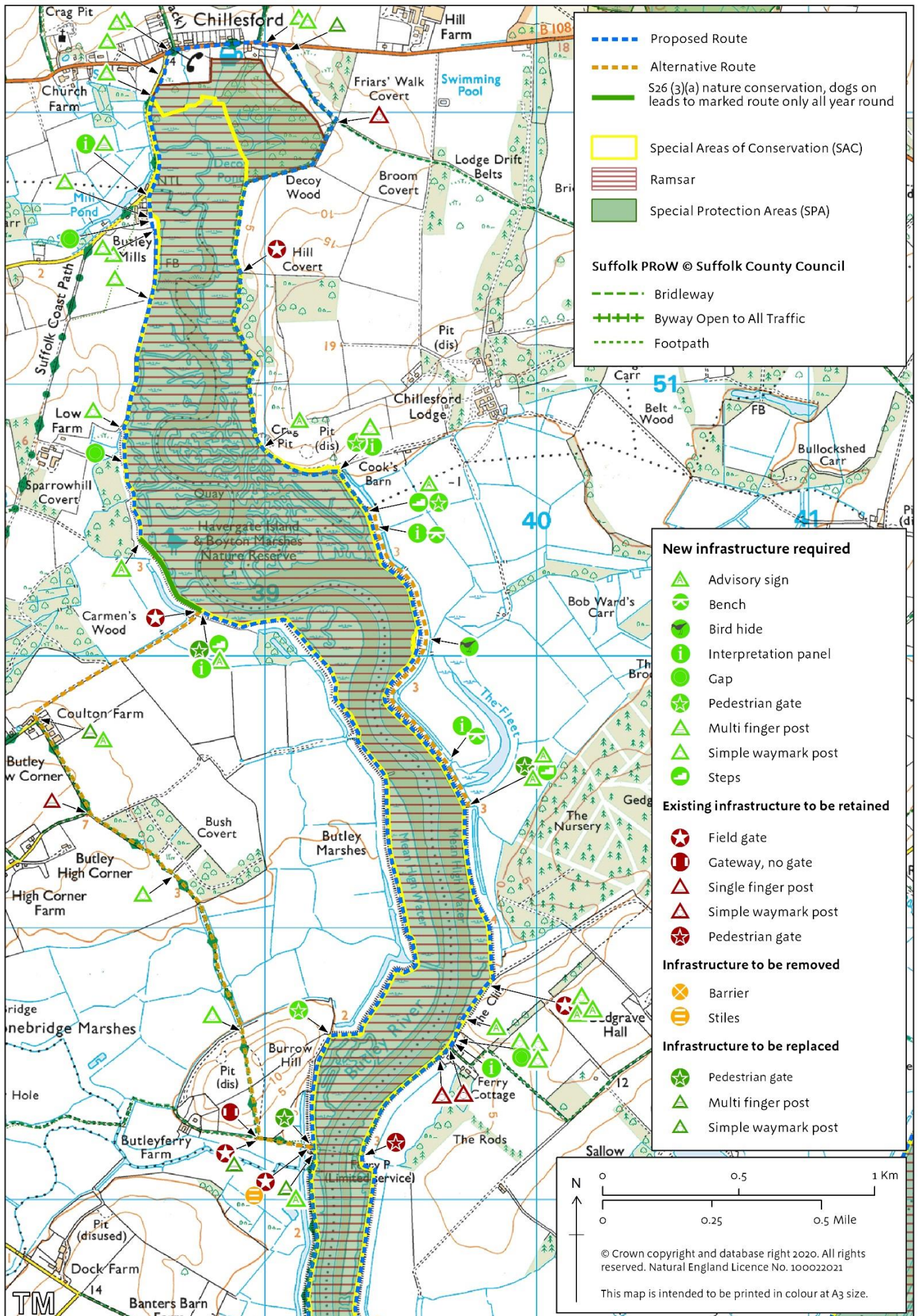


### Map 3 - Proposed alignment at Shingle Street





Map 4 - Proposed alignment around the Butley River





## Assessment of Coastal Access proposals under regulation 63 of the Habitats Regulations 2017 (as amended) ('Habitats Regulations Assessment')

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### Appendix 2: Figures from Ornithological Report

The following Maps A and B have been reproduced here with permission from:

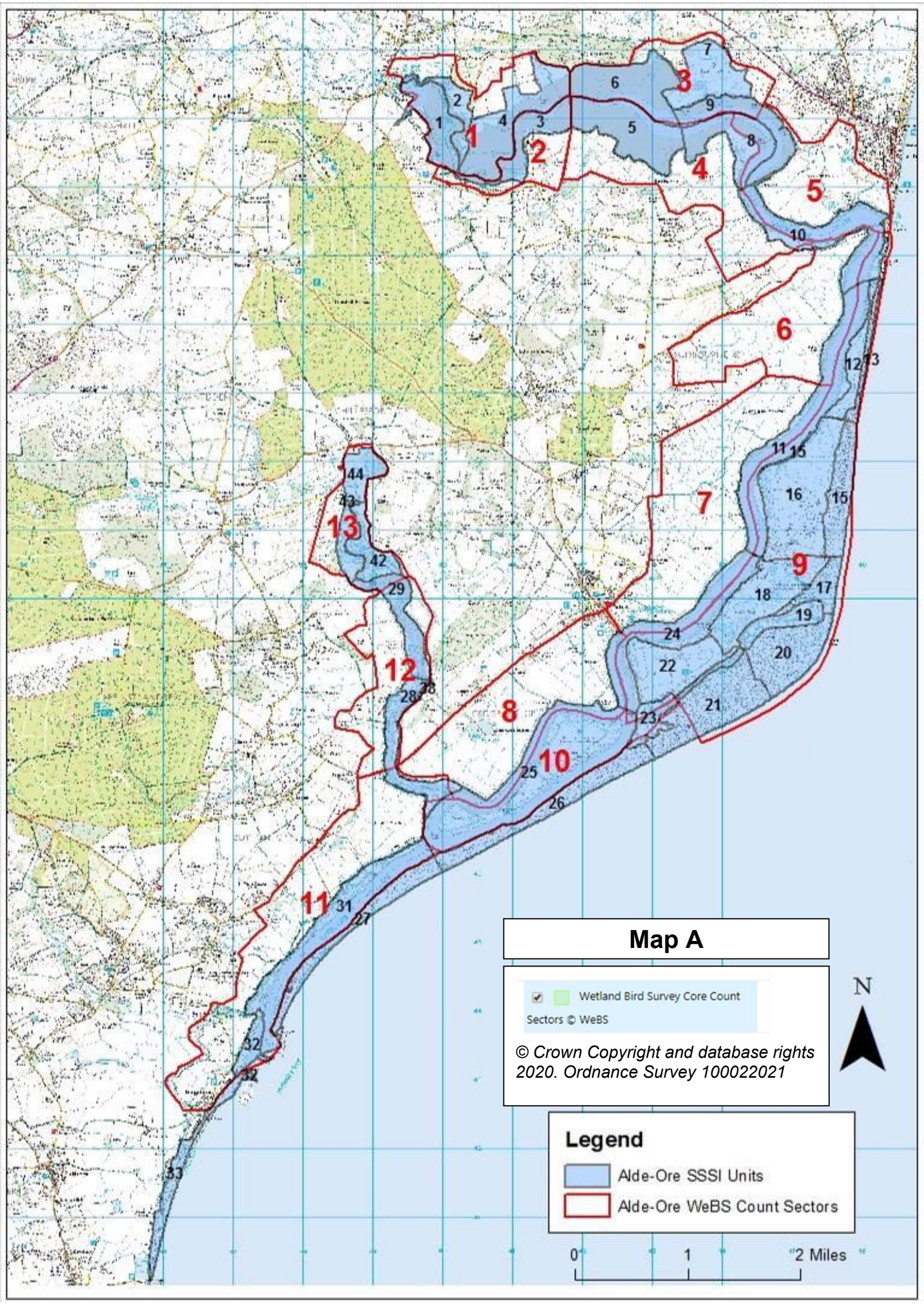
*The Ornithological Importance and Status of the Alde-Ore Estuary*  
A Natural England report by Patrick Woods, January 2017

For the purposes of clarity within this report the labels 'Map A' and 'Map B' have been added.

Map A displays Alde-Ore SSSI unit boundaries and Alde-Ore Wetland Bird Survey (WeBS) count sectors.

Map B displays Alde-Ore SSSI unit boundaries and WeBS low tide count sectors.

*Data were supplied by the Wetland Bird Survey (WeBS), a partnership between the British Trust for Ornithology, the Royal Society for the Protection of Birds and the Joint Nature Conservation Committee (the last on behalf of the statutory nature conservation bodies: Natural England, Natural Resources Wales and Scottish Natural Heritage and the Department of the Environment Northern Ireland) in association with the Wildfowl and Wetlands Trust*





**Map A**

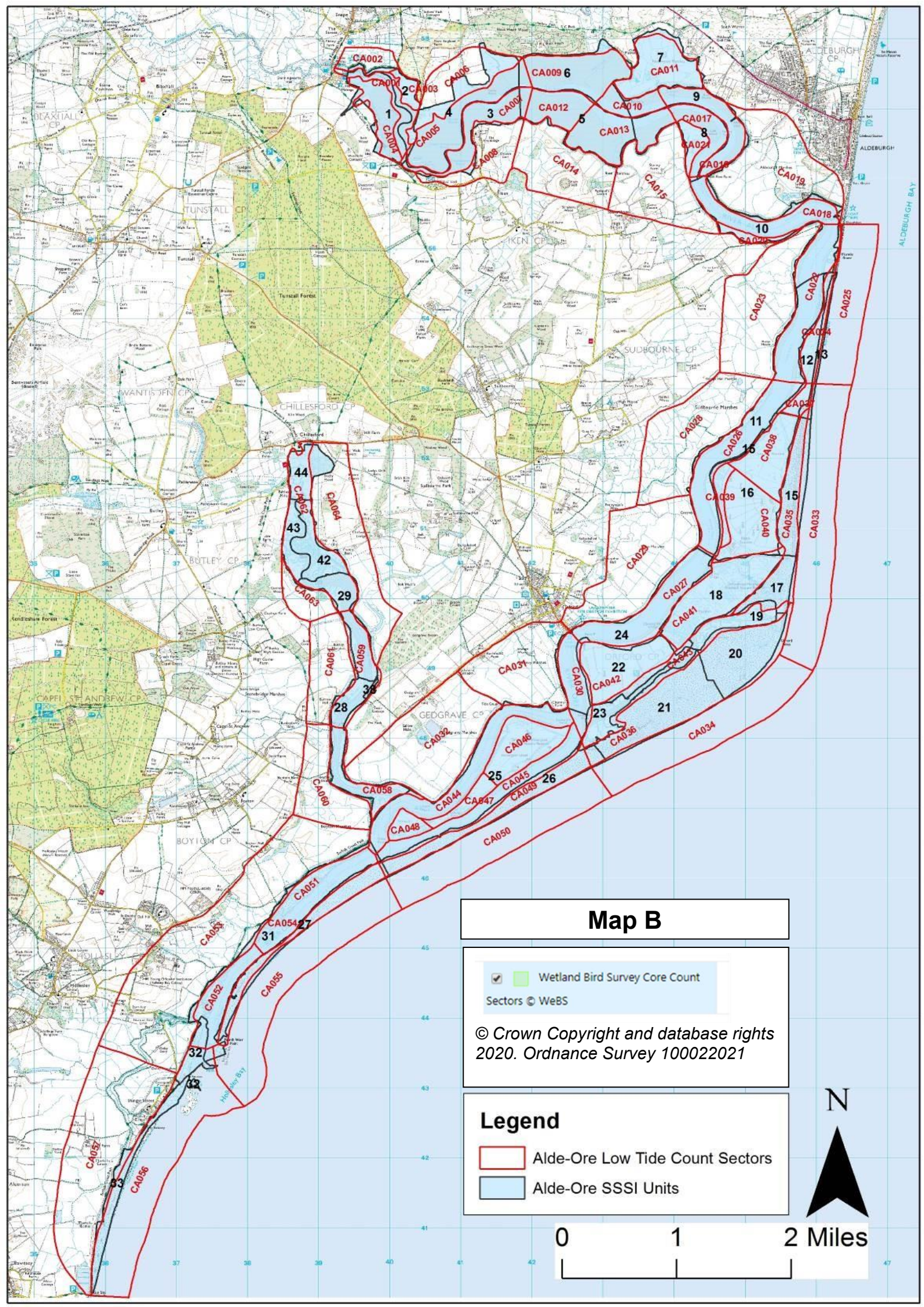
Wetland Bird Survey Core Count  
Sectors © WeBS

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**Legend**

-  Alde-Ore SSSI Units
-  Alde-Ore WeBS Count Sectors

0 1 2 Miles

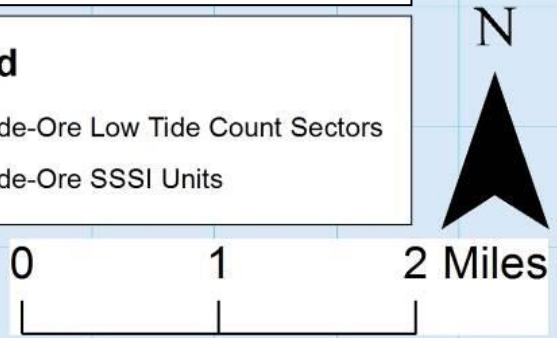


### Map B

Wetland Bird Survey Core Count  
 Sectors WeBS  
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### Legend

- Alde-Ore Low Tide Count Sectors
- Alde-Ore SSSI Units



### Appendix 3: Qualifying Features Assessed in the HRA and NCA documents

The following table outlines which qualifying features are assessed in this Habitats Regulations Assessment (HRA) and which are assessed in the accompanying Nature Conservation Assessment (NCA).

Qualifying feature	Alde-Ore Estuary Ramsar	Alde-Ore Estuary SPA	Outer Thames Estuary SPA	Sandlings SPA	Alde-Ore & Butley Estuaries	Orfordness-Shingle Street SAC	Southern North Sea SAC	Bawdsey Cliff SSSI	Iken Wood SSSI	Aldeburgh Hall Pit SSSI	Aldeburgh Brick Pit	Round Hill Pit, Aldeburgh SSSI	Snape Warren SSSI	Alde-Ore Estuary SSSI	NCA	HRA
A081 <i>Circus aeruginosus</i> ; Eurasian marsh harrier (Breeding)		✓												✓		HRA
A132 <i>Recurvirostra avosetta</i> ; Pied avocet (Non-breeding)	✓	✓												✓		HRA
A132 <i>Recurvirostra avosetta</i> ; Pied avocet (Breeding)		✓												✓		HRA
A151 <i>Philomachus pugnax</i> ; Ruff (Non-breeding)		✓												✓		HRA
A162 <i>Tringa totanus</i> ; Common redshank (Non-breeding)	✓	✓												✓		HRA
A183 <i>Larus fuscus</i> ; Lesser black-backed gull (Breeding)	✓	✓												✓		HRA
A191 <i>Sterna sandvicensis</i> ; Sandwich tern (Breeding)		✓												✓		HRA
A195 <i>Sternula albifrons</i> ; Little tern (Breeding)		✓	✓											✓		HRA
A193 Common tern <i>Sterna hirundo</i> (breeding)			✓													HRA
A001 Red-throated diver <i>Gavia stellata</i> (non-breeding)			✓													HRA
Breeding Wetland Bird Assemblage  Marsh Harrier <i>Circus aeruginosus</i> Mediterranean gull <i>Larus melanocephalus</i> Sandwich tern <i>Sterna</i>	✓															HRA

## Assessment of Coastal Access proposals under regulation 63 of the Habitats Regulations 2017 (as amended) ('Habitats Regulations Assessment')

Qualifying feature	Alde-Ore Estuary Ramsar	Alde-Ore Estuary SPA	Outer Thames Estuary SPA	Sandlings SPA	Alde-Ore & Butley Estuaries	Orfordness-Shingle Street SAC	Southern North Sea SAC	Bawdsey Cliff SSSI	Iken Wood SSSI	Aldeburgh Hall Pit SSSI	Aldeburgh Brick Pit	Round Hill Pit, Aldeburgh SSSI	Snape Warren SSSI	Alde-Ore Estuary SSSI	NCA	HRA
<i>(Thalasseus) sandvicensis sandvicensis</i> Little tern <i>Sternula albifrons albifrons</i>																
Water bird assemblage (non-breeding)  Black-tailed godwit <i>Limosa limosa islandica</i> Spotted redshank <i>Tringa erythropus</i> Common greenshank <i>Tringa nebularia</i> Greater white-fronted goose <i>Anser albifrons albifrons</i> Common shelduck <i>Tadorna tadorna</i> Eurasian wigeon <i>Anas penelope</i> Eurasian teal <i>Anas crecca</i> Northern pintail <i>Anas acuta</i> Northern shoveler <i>Anas clypeata</i>	✓															HRA
A224 <i>Caprimulgus europaeus</i> ; European nightjar (Breeding)				✓												HRA
A246 <i>Lullula arborea</i> ; Woodlark (Breeding)				✓												HRA
Wetland invertebrate assemblage  <i>Nematostella vectensis</i> & <i>Gammarus insensibilis</i> of saline lagoons <i>Malacosoma castrensis</i> <i>Campsicnemus magius</i> <i>Cheilosia velutina</i> <i>Empis prodomus</i> <i>Dixella attica</i> <i>Hylaeus euryscapus</i>	✓															HRA

## Assessment of Coastal Access proposals under regulation 63 of the Habitats Regulations 2017 (as amended) (‘Habitats Regulations Assessment’)

Qualifying feature	Alde-Ore Estuary Ramsar	Alde-Ore Estuary SPA	Outer Thames Estuary SPA	Sandlings SPA	Alde-Ore & Butley Estuaries	Orfordness-Shingle Street SAC	Southern North Sea SAC	Bawdsey Cliff SSSI	Iken Wood SSSI	Aldeburgh Hall Pit SSSI	Aldeburgh Brick Pit	Round Hill Pit, Aldeburgh SSSI	Snape Warren SSSI	Alde-Ore Estuary SSSI	NCA	HRA
<i>Pseudamnicola confusa</i> <i>Euophrys browningi</i> <i>Baryphyma duffeyi</i> <i>Haplodrassus minor</i> <i>Trichoncus affinis</i>																
Wetland plant assemblage  <i>Althaea officinalis</i> <i>Frankenia laevis</i> <i>Lathyrus japonicus</i> <i>Lepidium latifolium</i> <i>Medicago minima</i> <i>Parapholis incurva</i> <i>Puccinellia fasciculata</i> <i>Ruppia cirrhosa</i> <i>Sarcocornia perennis</i> <i>Sonchus palustris</i> <i>Trifolium suffocatum</i> <i>Vicia lutea</i> <i>Zostera angustifolia</i>	✓															HRA
Estuaries					✓									✓		HRA
Mudflat and sandflat not covered by seawater at low tide					✓											HRA
Atlantic salt meadows ( <i>Glauco-Puccinellietalia maritima</i> )					✓									✓		HRA
1150 Coastal Lagoons						✓								✓		HRA
1210 Annual vegetation of drift lines						✓										HRA
1220 Perennial vegetation of stony banks						✓										HRA
Harbour porpoise <i>Phocoena phocoena</i>							✓									HRA
Aggregations of breeding birds - Black-headed gull, <i>Larus ridibundus</i>														✓		NCA

## Assessment of Coastal Access proposals under regulation 63 of the Habitats Regulations 2017 (as amended) (‘Habitats Regulations Assessment’)

Qualifying feature	Aide-Ore Estuary Ramsar	Aide-Ore Estuary SPA	Outer Thames Estuary SPA	Sandlings SPA	Aide-Ore & Butley Estuaries	Orfordness-Shingle Street SAC	Southern North Sea SAC	Bawdsey Cliff SSSI	Iken Wood SSSI	Aldeburgh Hall Pit SSSI	Aldeburgh Brick Pit	Round Hill Pit, Aldeburgh SSSI	Snape Warren SSSI	Aide-Ore Estuary SSSI	NCA	HRA
	Aggregations of breeding birds - Herring gull, <i>Larus argentatus</i>														✓	NCA
Aggregations of breeding birds - Shoveler, <i>Anas clypeata</i> (non-breeding only is part of Ramsar assemblage)														✓	NCA	
Aggregations of non-breeding birds - Bewick's swan, <i>Cygnus columbianus bewickii</i>														✓	NCA	
Aggregations of non-breeding birds - Shelduck, <i>Tadorna tadorna</i> (part of Ramsar assemblage)	✓													✓	HRA	
Aggregations of non-breeding birds - Teal, <i>Anas crecca</i> (part of Ramsar Assemblage)	✓													✓	HRA	
Aggregations of non-breeding birds - Wigeon, <i>Anas penelope</i> (part of Ramsar Assemblage)	✓													✓	HRA	
Assemblages of breeding birds - Lowland damp grasslands: -														✓	NCA	
Mute Swan																NCA
Shelduck (non-breeding only is Ramsar)																NCA
Gadwall																NCA
Teal (non-breeding only is Ramsar)																NCA
Pintail (non-breeding only is Ramsar)																NCA
Garganey																NCA
Shoveler (non-breeding only is Ramsar)																NCA
Pochard																NCA



## Assessment of Coastal Access proposals under regulation 63 of the Habitats Regulations 2017 (as amended) ('Habitats Regulations Assessment')

Qualifying feature	Alde-Ore Estuary Ramsar	Alde-Ore Estuary SPA	Outer Thames Estuary SPA	Sandlings SPA	Alde-Ore & Butley Estuaries	Orfordness-Shingle Street SAC	Southern North Sea SAC	Bawdsey Cliff SSSI	Iken Wood SSSI	Aldeburgh Hall Pit SSSI	Aldeburgh Brick Pit	Round Hill Pit, Aldeburgh SSSI	Snape Warren SSSI	Alde-Ore Estuary SSSI	NCA	HRA
	Grey Heron															
Little Egret																NCA
Marsh Harrier		✓														HRA
(Corncrake – rare visitor)																NCA
Lapwing																NCA
Ruff (non-breeding only is Ramsar)																NCA
Snipe																NCA
Black-tailed Godwit																NCA
Curlew																NCA
Redshank (non-breeding only is Ramsar)																NCA
Cuckoo																NCA
Grasshopper Warbler																NCA
Sedge Warbler																NCA
Yellow Wagtail																NCA
Reed Bunting																NCA
Quail																NCA
Short-eared Owl																NCA
Whinchat																NCA
Mute Swan																NCA
Shelduck (non-breeding only is Ramsar)																NCA
Assemblages of breeding birds - Mixed														✓		NCA
Assemblages of breeding birds - variety of species <i>(Note: breeding avocet, marsh harrier, lesser black-backed gull, Mediterranean gull, &amp; Sandwich, little and common terns are assessed in the HRA)</i>														✓		NCA

## Assessment of Coastal Access proposals under regulation 63 of the Habitats Regulations 2017 (as amended) (‘Habitats Regulations Assessment’)

Qualifying feature	Aide-Ore Estuary Ramsar	Aide-Ore Estuary SPA	Outer Thames Estuary SPA	Sandlings SPA	Aide-Ore & Butley Estuaries	Orfordness-Shingle Street SAC	Southern North Sea SAC	Bawdsey Cliff SSSI	Iken Wood SSSI	Aldeburgh Hall Pit SSSI	Aldeburgh Brick Pit	Round Hill Pit, Aldeburgh SSSI	Snape Warren SSSI	Aide-Ore Estuary SSSI	NCA	HRA
	Hard maritime cliff and slope														✓	
IA - Coastal Geomorphology														✓		NCA
Invert. assemblage F1 unshaded early successional mosaic														✓		NCA
Invert. assemblage M1 rocky shore														✓		NCA
Invert. assemblage M311 saltmarsh and transitional brackish marsh ( <i>part of Ramsar inverts</i> )	✓													✓		HRA
Littoral sediment														✓		NCA
Population of Schedule 5 sea anemone - <i>Nematostella vectensis</i> , Starlet Sea Anemone ( <i>part of Ramsar invert assemblage</i> )														✓		HRA
SM4-28 – Saltmarsh ( <i>part of SAC saltmarsh</i> )					✓									✓		HRA
Vascular plant assemblage														✓		NCA
Floodplain fen (lowland)													✓			NCA
Lowland dry acid grassland (U1b,c,d,f)													✓			NCA
Lowland dry acid grassland (U4)													✓			NCA
Lowland dry heath													✓			NCA
ED- Neogene										✓	✓	✓				NCA
EC – Quaternary of East Anglia								✓								NCA
Lowland mixed deciduous woodland									✓							NCA