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Land West of Holbeach

Habitats Regulations Assessment

Stage 1 Screening

Lincolnshire County Council, Mr RH and Mr AM Goodley

December 2023



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FIGURE 2. DESIGNATED SITES PLAN

1.0 INTRODUCTION

This Habitats Regulations Assessment (HRA) Stage 1 Screening report has been prepared on behalf of Robert Doughty Consultancy (the agent) for Lincolnshire County Council, Mr RH and Mr AM Goodley (the clients), in relation to a proposed development on land west of Holbeach (the Project), see [Figure 1. Site Location Plan](#).

This HRA reports specifically to potential Likely Significant Effects (LSE) arising from the Project upon sites protected under the Conservation of Habitats and Species Regulations 2017 (as amended), including Special Protected Areas (SPAs) and Special Areas of Conservation (SACs) which are European Designated sites (Natura 2000 sites), Ramsar Wetlands of International Importance (Ramsars), and species and habitats which are listed as features of primary selection for the designations.

Plans for the Site

At the time of writing, details of the proposals had yet to be confirmed, however it is understood that the client is seeking permission for the development of approximately 650 dwellings, public open space and landscaping.

Project Location and Context

The Project site is ca.31.6 ha and situated within the western fringes of Holbeach, Lincolnshire, centroid Grid Reference TF 34957 25235. Two main roads bound the Project site to the north and west, including the A17 and A151, respectively. Holbeach town is located directly east and south.

Existing habitats within the Project site include swathes of arable land, neutral grassland and allotments¹. There are a small number of buildings on-site and two ponds bounded by woodland. There is one main drain (New River drain), which is fed by a network of on-site drain ditches, which are not hydrologically linked with the wider landscape.

Purpose of this Report

Under the requirements of the European Council Directive 92/43/EEC 'The Habitats Directive' and Council Directive 79/409/EEC 'The Wild Birds Directive' it is necessary to consider whether the proposed Project may have significant effects upon areas of nature conservation importance designated/classified under the Directives. This is translated into domestic law in England through the Conservation of Habitats and Species Regulations 2017 (2017), 'The Habitat Regulations.'

The Habitat Regulations place a duty upon 'Competent Authorities' to consider the potential for effects upon sites of European importance prior to granting consent for projects or plans. Should the initial screening process identify likely significant effects, it is necessary to further consider the effects through an 'Appropriate Assessment.'

The HRA process has four stages, with this report covering Stage 1 Screening:

- *Stage 1 - Screening*: to test whether a plan or project, either alone or in-combination with other plans and projects, is likely to have a significant effect on a protected site.
- *Stage 2 - Appropriate Assessment*: to determine whether, in view of a protected site's conservation objectives, the plan, alone or in-combination, would have an adverse effect, or even a risk of this, on the integrity of the site with respect to the site structure, function and

¹ Ecology Resources, (October 2023). Preliminary Ecological Appraisal

conservation objectives. If adverse impacts are anticipated, potential mitigation measures to alleviate impacts should be proposed and assessed.

- *Stage 3 - Assessment of Alternatives*: where a plan is assessed as having an adverse impact, or risk of this, on the integrity of an international site even with mitigation in place, there should be an examination of alternatives such as alternative locations and designs of development.
- *Stage 4 - 'IROPI'*: final stage assessment where there are no alternative solutions and where adverse impacts remain. Only where there are 'imperative reasons of overriding public interest' (IROPI), compensatory measures may be agreed and provided to offset adverse impacts and so maintain the overall coherence of the site or integrity of the European site network.

Local Planning Policy

The Project site is situated within the housing allocation area of Holbeach West (Hob048) of the Local Plan². Policy 11 and 16, which include specific ecological considerations are considered pertinent to the site.

Policy 11: Distribution of New Housing includes housing number allocations and extents of land for where housing is allocated, as determined from Policy 10: Meeting Assessed Housing Requirements. Land identified for new housing relates to land linked to existing settlements, with Holbeach identified as a main service centre and allocated up to 2202 houses.

Policy 16: Holbeach West Sustainable Urban Extension identifies 44 ha at Holbeach West is allocated for residential use, with approximately 900 new homes that meet the following specific needs relating to integrated design of publicly accessible green infrastructure:

- Green corridors alongside the New River Drain and other drains crossing the site to provide a well-connected green network for access and recreation and to enhance the historic environment.
- Wetlands and woodland and associated environmental enhancement to enhance the biodiversity value of the site.
- A 2ha local park and other multifunctional open space to be a focus for informal recreation and children's play within each neighbourhood.
- Specific requirements identified to mitigate any impacts identified by the project-level HRA.

In addition, there is a specific requirement to integrate significant structural landscaping belts along the boundaries with the A151 and the A17.

The Local Policy identifies that housing can have negative impacts on the natural environment with *Policy 28: The Natural Environment* providing an approach to conserve and enhance natural assets. This includes the requirement for a project-level HRA to be completed for all major housing proposal within 10km of The Wash and North Norfolk Coast European designations.

² South East Lincolnshire Joint Strategic Planning Committee, (2019). South East Lincolnshire Local Plan 2011-2036.

2.0 METHODOLOGY

Desk Study

The following internet sources were reviewed to inform the HRA Stage 1 assessment:

- Multi Agency Geographic Information for the Countryside (MAGIC) (<https://magic.defra.gov.uk>)
- The Joint Nature Conservation Committee (<https://jncc.gov.uk>) for designation citations
- Review of the South East Lincolnshire Local Plan 2011-2036
- Review of The Wash Shoreline Management Plan 2 (2010) Non-technical summary, Gibraltar Point to Old Hunstanton.
- Review of 1:25000 OS base maps (www.ordnancesurvey.co.uk) and Google Earth (www.maps.google.co.uk) to identify potential pathways in the form of hydrological and / or terrestrial connections between the Project and designated sites.

Assessment of Likely Significant Effects

LSE potentially associated with the Project during construction and operational phases are listed in Table 1. Stage 1 screening of the LSE enables for identification of activities associated with a project, alone or in-combination, without detailed assessment, to determine the LSE upon European sites.

In-combination effects have been assessed against the South East Lincolnshire Local Plan 2011-2036 and list of current planning applications covering South Holland District Council.³

Table 1. Potential Likely Significant Effects associated with the Project.	
Broad Category of Potential Effects	Potential Specific Effects on European Sites
Habitat loss/ fragmentation, including loss of functionally linked land and effects on species away from European sites.	Loss of on-site habitat within European site resulting from direct land take. Loss / fragmentation of off-site functionally linked habitat between the Project Site and European site(s).
Increased recreational pressure.	Direct damage to habitats from trampling and erosion. Increased disturbance to species from larger footfall of people and dogs. Killing of species from increased predation (dogs) and eutrophication from dog fouling.
Urbanisation effects.	Noise, vibration, light pollution during construction and operation. Species mortality such as collision risk from new roads, increased traffic. Fly-tipping, vandalism, anti-social behaviour, Increased fire risk.
Hydrological, changes to water table levels and flows.	Drying and reduction of water table levels from increased abstraction for new housing development, effecting functionally linked habitats used by qualifying species.
Hydrological, changes in water quality.	Potential increased surface water runoff from new development leading to contamination of watercourses. Potential increase in wastewater discharge, leading to reduction of water quality.

³ <https://planning.sholland.gov.uk/> a search for applications for King's Lynn, Long Sutton, Holbeach, Boston
(All internet sources cited in this report were accessed in November 2023)

Air pollution, increased emissions from increased levels of nitrogen (N)	Dust smothering during construction phase and Increased emissions during and post construction leading to damage / changes in composition of habitats and their viability as a feeding resource for qualifying bird species.
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3.0 DESIGNATED SITES

As shown on **Figure 2. Designated Sites Plan**, the Project lies within 7.75km of The Wash Ramsar and SPA and The Wash & North Norfolk Coast SAC.

Ramsar sites are wetlands which are considered to be of international significance. Many Ramsar sites in the UK were initially selected on the basis of their importance to waterbirds and are also classified as SPAs. However, their importance to non-bird species and habitats are also considered within the selection assessment process.

SACs are sites adopted by the European Commission and formally designated by the government for their high-quality habitats and species under the respective Annexes I and II the Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora (the Habitats Directive).

SPAs are selected and protected under the European Union Directive 2009/147/EC for the Conservation of Wild Birds, requiring member states of the European Union to safeguard habitats of migratory birds and certain threatened birds.

SACs and SPAs together form a national site network (Natura 2000 sites) where the UK Government is required under the European Union to administer the protection and maintenance of SPAs and SACs.

Tables 2-4 provide a summary overview of the Ramsar, SPA and SAC qualifying criteria.

Table 2. The Wash Ramsar ⁴			
Designation code	Centroid	Area (ha)	Counties covered
UK11072	52 56 16 N; 00 17 12 E	62211.66	Lincolnshire, Norfolk
General Site Character. The Wash is located on the east coast of England between the coastal town of Hunstanton in North Norfolk and Skegness in Lincolnshire. The largest estuarine system in Britain, the Wash is fed by the rivers Witham, Welland, Nene and Great Ouse. Extensive saltmarshes and intertidal banks of sand and mud provide favourable conditions for over-wintering migrant wildfowl and waders. Also supports the North Sea's largest breeding population of common seal <i>Phoca vitulina</i> and grey seal <i>Halichoerus grypus</i>.			
Ramsar Criteria. The Wash qualifies under four Ramsar Criteria: Criterion 1: coastal habitats for extensive saltmarshes, major intertidal banks of sand and mud, shallow water and deep channels. Criterion 3: due to the inter-relationship between various components; saltmarshes intertidal sand and mud flats and the estuarine waters. The saltmarshes and the plankton in the estuarine water provide a primary source of organic material which, together with other organic matter, forms the basis for the high productivity of the estuary. Criterion 5: qualifies for its' bird assemblages - 292,541 waterfowl (5-year peak mean) Criterion 6: breeding and over-winter wildfowl and wader populations, with 17 listed species; grey plover <i>Pluvialis squatarola</i>, red knot <i>Calidris canutus</i>, sanderling <i>Calidris alba</i>, Eurasian curlew <i>Numenius arquata</i>, common redshank <i>Tringa tetanus</i>, ruddy turnstone <i>Arenaria interpres</i>, pink-footed goose <i>Anser brachyrhynchus</i>, dark-bellied brent goose <i>Branta bernicula</i>, common shelduck <i>Tadorna tadorna</i>, northern			

⁴ Data extracted and summarised from: JNCC, (13.06.2008). Ramsar Information Sheet: UK11072, Version 3.0.

pintail *Anas acuta*, dunlin *Calidris alpina alpina*. And consideration for ringed plover *Limosa limosa*, black-tailed godwit *Limosa limosa islandica*, European golden plover *Pluvialis apricaria*, northern lapwing *Vanellus vanellus*.

Factors adversely affecting the site's ecological character. None identified on the Ramsar sheet.

Current site use. Land based recreation is chiefly limited to wildfowling, bird watching and walking along the sea banks at around two-thirds of the site. Water sports including windsurfing, water-skiing and power boats occur mainly at Hunstanton and Heacham on the Norfolk shore. Recreational activities are subject to the Wash Estuary Management Plan⁵ but are not generally seen as detrimental to the site.

Table 3. The Wash and North Norfolk Coast SAC⁶

Designation code	Centroid	Area (ha)	Counties covered
UK0017075	TF 558403	107718	Lincolnshire, Norfolk
General Site Character. Marine areas and sea inlets making up 51%, tidal rivers, estuaries, mud flats, sand flats, lagoons (including salt work basin) equating to 46% and salt marshes, salt pastures and salt steppes of 3%. Conservation Aim. Ensure that the integrity of the site is maintained or restored as appropriate and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring.			
Annex I habitats, primary reason for selection: 1110 Sandbanks which are slightly covered by sea water all the time. 1140 Mudflats and sandflats not covered by seawater at low tide. 1160 Large shallow inlets and bays. 1170 Reefs. 1310 Salicornia and other annuals colonizing mud and sand. 1330 Atlantic salt meadows (salt marsh). 1420 Mediterranean and thermos-Atlantic <i>halophilous</i>. With the exclusion of 1330 and 1420, all qualifying habitats occur within the aquatic zone. 1330 and 1420 are associated with saltmarsh, which are part inundated during high tide.			
Annex II species, primary reason for selection. 1365 Harbour seal <i>Phoca vitulina</i>.			
Non primary qualifying features. 1150 Coastal lagoons and 1355 otter <i>Lutra lutra</i>.			

Table 4. The Wash SPA

Designation code	Centroid	Area (ha)	Counties covered
UK9008021	TF 558403	107718	Lincolnshire and Norfolk
General Site Character. The Wash is numerically the most important area in Britain for wintering waders and wildfowl. Conservation Aim. To ensure that the integrity of the site is maintained or restored as appropriate and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring.			
The Wash qualifies under Article 4(1), for the following species: Bewick's swan <i>Cygnus columbianus bewickii</i>; 130 over wintering (3% British population) Common tern <i>Sterna hirundo</i>; 220 breeding pairs (2% British population) Little tern <i>Sterna albifrons</i>; 30 breeding pairs (2% British population) The Wash qualifies for internationally important wetland species under Article 4(2): Pink-footed goose <i>Anser brachyrhynchus</i>; 7,300 over wintering (7% British population)			

⁵ Env. Agency. (2010). The Wash Shoreline Management Plan 2, Non-technical summary, Gibraltar Point to Old Hunstanton.

⁶ <https://publications.naturalengland.org.uk/> citation for the Wash and North Norfolk Coast SAC.

Dark-bellied brent goose *Branta bernicla bernicla*; 17,000 over wintering (12% European population)
 Common shelduck *Tadorna tadorna*; 16,000 over wintering (12% European population)
 Northern pintail *Anas acuta*; 1,700 over wintering (2% European population)
 Eurasian oystercatcher *Haematopus ostralegus*; 24,000 (3% European population)
 Grey plover *Pluvialis squatarola*; 5,500 (7% European population)
 Red knot *Calidris canutus*; 7,500 over wintering (21% European population)
 Sanderling *Calidris alba*; 500 over wintering 3% (European population)
 Dunlin *Calidris alpina alpina*; 29,000 over wintering (1% European population)
 Bar-tailed godwit *Limosa lapponica*; 8,200 (1% European population)
 Eurasian curlew *Numenius arquata*; 3,700 over wintering (1% European population)
 Common redshank *Tringa totanus*; 4,331 over wintering (5% European population)
 Ruddy turnstone *Arenaria interpres*; 980 over wintering (2% European population)

Nationally important site for other non-breeding species

Black-tailed godwit *Limosa limosa islandica*; 260 wintering (2% British population)
 Eurasian wigeon *Anas penelope*; 3,900 wintering (2% British population)
 Common goldeneye *Bucephala clangula*; 220 wintering (1% of British population)
 Gadwall *Anas strepera*; 130 wintering (3% of British population)
 Black (common) scoter *Melanitta nigra*; 830 (2% British population)

Non primary qualifying features. Saltmarsh supports a diverse breeding bird population, including over 4,000 pairs of black-headed gulls *Larus ridibundus*, shelducks and numerous wader species.

4.0 SCREENING OF LIKELY SIGNIFICANT EFFECTS

Assessment of Effects - Alone

Tables 5 and 6 detail the assessment of LSE for the Wash and North Norfolk Coast SAC and the Wash SPA. The assessment consistently results as **Not Significant**, meaning the Project will not have a detrimental effect on the qualifying features of the European designations, which inherently also relates to qualifying criteria of the RAMSAR.

Key factors for the **Not Significant** results include:

- The distance (7.75km) to the nearest point of the European designations combined with an absence of hydrological connectivity.
- The Project Site is adjacent to the existing conurbation of Holbeach Town and is bounded by main roads (A151 and A17). Relative to these features, construction and operation of the Project are not likely to exceed noise or pollution levels beyond current conditions.
- Due to the inaccessibility and extensive character of the designated estuarine habitats, additional footfall is not likely impact habitats or effect the habitual patterns of bird species.

Assessment of Effects - In-combination

Review of <https://planning.sholland.gov.uk> shows the following proposed and granted planning permissions for Holbeach and the surrounding settlements of Holbeach St Marks, Holbeach Hurn, Saracen's Head, Fleet Hargate, Gedney and Long Sutton:

- H09-1029-23-reserved matters: land off Hallgate & Fen Road, south of Holbeach. Erection of 285 dwellings including parking, public open space, drainage, infrastructure, landscaping, access, appearance, layout and scale (Phase 3) .
- H11-0935-2 resubmission for modification post approval: Long Sutton relating to erection of 171 dwellings. A decision for the application is due on the 20th December 2023.

All proposed and granted developments fall within allocated housing areas close to existing settlements. In accordance with Local Planning Policy, all developments will need to integrate green infrastructure (footpath and cycle routes) to offset wider pressure on coastal paths linked to European designations.

In combination, the developments linked to existing settlements and provision for green infrastructure are assessed as having no significant impacts on the designations. The assessment of potential impacts in Table 5 and 6 illustrate that there will be no direct or indirect effects upon habitats or bird species during construction or operation of the Project. Whilst this assessment is Project specific, the resulting significance is not likely to be influenced by the in-combination effects of additional proposed developments.

Table 5. The Wash and North Norfolk Coast SAC - Assessment of Likely Significant Effects.

Potential Impact	Assessment Construction Phase	Assessment Operational Phase	Significance
Habitat loss/ fragmentation	The Project Site is 7.75km from the SAC and will not result in direct habitat loss or fragmentation.	No operational activities identified to result in habitat Loss / fragmentation of European site extents or off-site habitats between the Project and the SAC.	Not significant
Increased recreational pressure	No recreational activities anticipated during construction.	Habitats associated with the SAC are largely inaccessible due to their estuarine character, with recreational access via established walking routes. No damage to habitats from trampling are predicted. In addition, publicly accessible green space as part of the development will offset pressure upon coastal paths.	Not significant
Urbanisation effects	Noise, vibration and light pollution are not relevant to SAC habitats.	Limited road access to the SAC, with inaccessible estuarine habitats a low risk for fire damage.	Not significant
Hydrological, changes to water table levels and flows.	The Project Site is bounded by the A151 to the west, the A17 to the north and the built environment of Holbeach town to the east and south. No anticipated change to water tables and not significant to estuarine influences of the SAC.	Due to existing built infrastructure and 7.75km distance to the SAC, no anticipated change to water tables or effects of estuarine process throughout SAC extents.	Not significant
Hydrological, changes in water quality	No hydrological pathways to SAC, fragmented drain system surrounding Project site.	No hydrological pathways to SAC, fragmented drain system surrounding Project site.	Not significant
Air pollution	No newly built main road infrastructure as part of Project, due to distance of SAC, no significant emission anticipated from construction traffic.	Increased levels of traffic unknown, although due to distance of SAC, no predicted emission effects upon the function of SAC estuarine habitats.	Not significant

Table 6. The Wash SPA - Assessment of Likely Significant Effects.			
Potential Impact	Assessment Construction Phase	Assessment Operational Phase	Significance
Habitat loss/ fragmentation & effects on species away from European sites	The Project Site is 7.75km from the SPA and no habitats for which the qualifying bird species depend upon will be directly or indirectly impacted.	Inaccessible estuarine habitats for which SPA qualifying bird species depend upon will not be impacted by operational activities of the Project site. Off-site habitats between the Project site and SPA could be utilised by breeding and overwintering SPA species, which will be subject to the same agricultural activities and not related to operation of the Project site.	Not significant
Increased recreational pressure	No recreational activities anticipated during construction.	Estuarine habitats utilised by SPA species are extensive and largely inaccessible to the public. Sea banks extending around two-thirds of the SPA are mainly accessed for bird watching, with activities such as windsurfing, water-skiing and power boating associated with Hunstanton. The Wash Estuary Management Plan identified these recreational activities as not detrimental to the SPA. Patterns of recreational activity during operation of the Project Site are assessed to remain consistent with current use of the SPA and are not likely to be detrimental to the integrity of the qualifying SPA features.	Not significant
Urbanisation effects	As the Project Site is 7.75km from the SPA and linked to existing conurbation of Holbeach, combined with noise generated from the A151 and the A17, development activities of the Project Site are no considered to result in significant additional effects from noise, vibration and light pollution.	Activities (noise, light pollution) from expanded urbanisation relative to the distance of the SPA are not likely to affect the habitual behaviour of the SPA qualifying bird species.	Not significant
Hydrological, changes to water table levels and flows.	During construction there are no anticipate changes to the water table, thus no subsequent effects upon estuarine process that could influence SPA species habitual patterns.	There are no anticipated changes to water table and no identified negative effects upon estuarine process or influential changes to the habitual patterns of SPA qualifying species.	Not significant
Hydrological, changes in water quality	No hydrological pathways to SPA, fragmented drain system surrounding Project site.	No hydrological pathways to SPA, fragmented drain system surrounding Project site.	Not significant

Table 6. The Wash SPA - Assessment of Likely Significant Effects.			
Potential Impact	Assessment Construction Phase	Assessment Operational Phase	Significance
Air pollution	No newly built main road infrastructure as part of Project and due to distance of SPA, no significant emission anticipated from construction traffic.	Due to distance of SPA, no predicted emission effects upon food availability for qualifying bird species.	Not significant

5.0 CONCLUSION

The HRA Stage 1 Screening Assessment for LSE results in the Project as being **Not Significant** alone or in combination to the qualifying features of The Wash Ramsar/SPA and The Wash & North Norfolk Coast SAC. Based on this assessment a Stage 2 Appropriate Assessment will not be required.

The development will need to align to local planning policy relating to Policy 16: Holbeach West Sustainable Urban Extension and Policy 28: The Natural Environment to ensure that accessible green infrastructure is integrated with the development, including significant structural landscaping belts along the boundaries with the A151 and the A17, parkland, wetland, woodland and green corridors alongside the New River Drain and other drains crossing the site.



Data sources: © Ecology Resources Ltd. 2023, Map data © 2023 Google Satellite, QuickMapServices © OpenStreetMap contributors



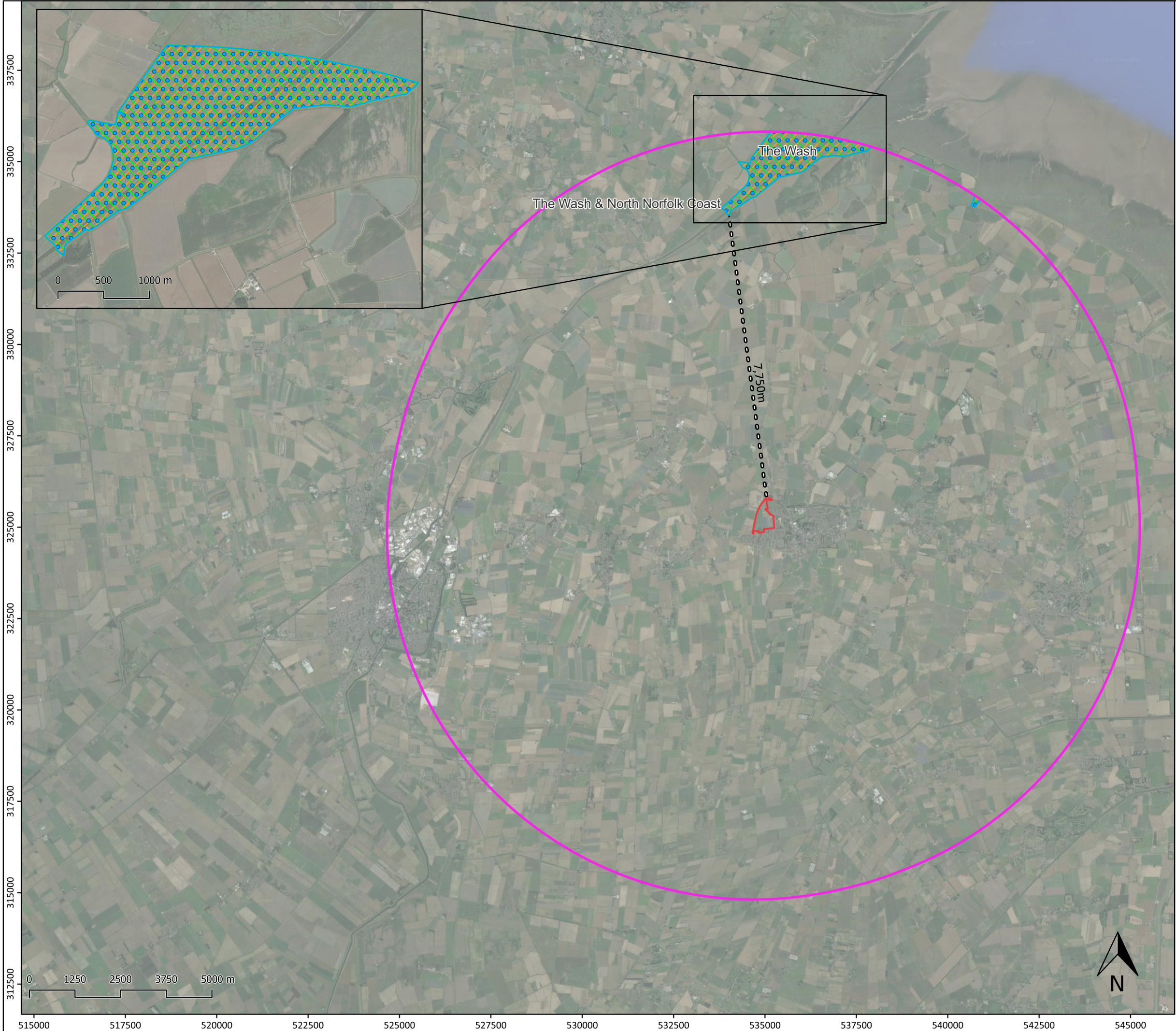
LEGEND

Red Line Boundary

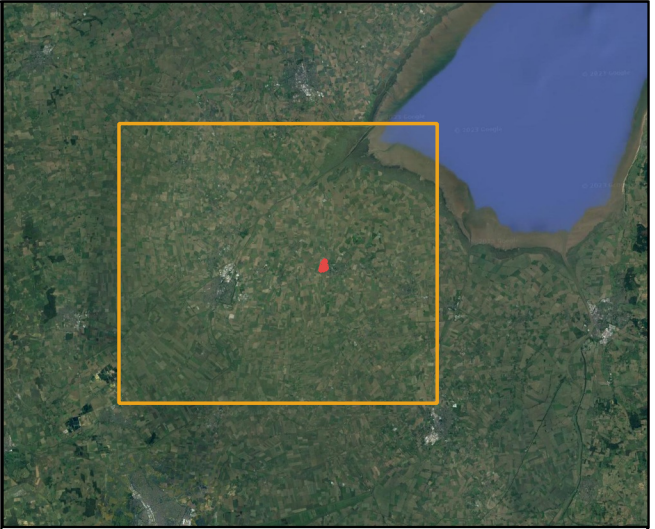
Figure 1. Site Location Plan

PROJECT TITLE		Land West of Holbeach				
REF	23156	CLIENT	Robert Doughty Consultancy			
VER	DATE	CREATED BY	VER	DATE	CREATED BY	
01	10/10/2023	Sam Groves				
CRS		OSGB36 \ British National Grid EPSG:27700				1:5000





Data sources: © Ecology Resources Ltd. 2023, Map data © 2023 Google Satellite, QuickMapServices © OpenStreetMap contributors



LEGEND

- Red Line Boundary
- 10km Buffer
- Statutory Designated Sites
 - Ramsar
 - Special Protection Area (SPA)
 - Special Area of Conservation (SAC)

Figure 3. Site Consultation Plan 2

PROJECT TITLE		Land West of Holbeach				
REF	23156	CLIENT	Robert Doughty Consultancy			
VER	DATE	CREATED BY	VER	DATE	CREATED BY	
01	10/10/2023	Sam Groves				
CRS		OSGB36 \ British National Grid EPSG:27700				1:100000

