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Document to Inform a Habitats Regulations Assessment

**Land East of Seagate Road, Long Sutton, Lincolnshire
(NGR: TF 4369 2232)**

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1.0 Executive Summary

- 1.1 Greenwillows Associates Ltd. has been commissioned to provide ecological input in relation to the development of planning proposals for land east of Seagate Road, Long Sutton, Lincolnshire (NGR: TL 4369 2232).
- 1.2 The proposals are for approximately 215 residential units with associated infrastructure and greenspace. The location is identified as a housing allocation site under Policy 11 of the emerging South East Lincolnshire Local Plan 2011-2036.
- 1.3 Screening for potential effects arising on European level designations (Special Protection Areas, Ramsar sites and Special Areas of Conservation) identifies likely significant effects arising as a result of increased recreational pressures on The Wash SPA/Ramsar site arising from the proposals.
- 1.4 Access points to The Wash most likely to be affected by the proposed development are identified and assessed. Due to a lack of available information regarding locations of high tide waterfowl roosts, a highly precautionary approach is taken in respect of potential effects.
- 1.5 It is concluded that the proposed development will make a minor contribution to cumulative increases in recreational pressure and potential adverse effects that might subsequently arise.
- 1.6 In the absence of an established strategic mitigation scheme to which the developer can make a financial contribution, on-site mitigation measures are proposed in the form of a circular (dog) walking route around the site and provision of information leaflets to new residents identifying alternative, non-coastal walking opportunities in the area.
- 1.7 With timely delivery of this mitigation it is concluded that there would be no residual effects arising from the development.

2.0 Introduction

Background and Proposals

- 2.1 Greenwillows Associates Ltd has been commissioned to prepare a document to inform a Habitats Regulations Assessment (HRA) in respect of proposed development on land east of Seagate Road, Long Sutton, Lincolnshire (NGR: TL 4369 2232).
- 2.2 The site, comprising 10.74 ha of largely arable land, is proposed for residential development, to deliver up to approximately 215 new dwellings. The site is located to the east of Seagate Road, Long Sutton, Lincolnshire - see Plan ECO1. The main part of the town of Long Sutton is located to the north and northwest, while in the wider area arable farming is the predominant land use. The site is identified as a housing allocation under Policy 11 of the emerging South East Lincolnshire Local Plan 2011-2036 (Publication Version, March 2017).
- 2.3 The Wash National Nature Reserve (NNR) lies 6.5km to the northeast of the site, with The Wash Site of Special Scientific Interest (SSSI), Special Protection Area (SPA) and Ramsar Site and The Wash and North Norfolk Coast Special Area of Conservation (SAC) located at approximately 6.9km to the north east. Gibraltar Point SPA and Ramsar Site is located approximately 37km to the north.

Emerging Policy

- 2.4 In relation to internationally designated sites, Policy 24 (The Natural Environment) of the emerging Local Plan states:

“all major housing proposals within 10km of The Wash and the North Norfolk Coast European Marine Site, including Sustainable Urban Extensions in Boston (site Sou006), Spalding (site Pin024/Pin 045) and Holbeach West (site HoB 048), will be the subject of a project-level Habitats Regulations Assessment (HRA) to assess the impact of recreational pressure on The Wash and the North Norfolk Coast European Marine Site.

This should include:

- i. Locally-specific information relating to access and site sensitivities;*

Where the project-level HRA concludes that avoidance and/or mitigation measures are required, it is expected that:

- i. Suitable Alternative Natural Greenspace (SANGs) should be provided on site Sou006, site Pin024/145 and site Hob048 as part of their package of mitigation measures; or*
- ii. all other major housing proposals should provide SANGs on-site and/or through a financial contribution to provide and/or enhance natural greenspace in the locality*
- iii. Suitable Alternative Natural Greenspaces should be designed in accordance with capacity and facility requirements in relation to the developments they mitigate for, best practice elsewhere and relevant evidence.”*

2.5 Policy 24 has arisen as a result of an HRA¹ undertaken in respect of the emerging Local Plan. In summary, this HRA identifies potential for adverse effects on the international-level designations to arise as a result of increased recreational pressures resulting from an increased population living in relatively close proximity to The Wash and North Norfolk Coast European Marine Site (an overarching designation encompassing a number of SPAs and SACs)

Purpose of this Report

2.6 This document assesses the likely effects of the proposed development on the interest features of international designations, in line with guidance for Habitats Regulations Assessments, to enable the competent authority to undertake an Appropriate Assessment of the proposals.

¹ South East Lincolnshire Local Plan Publication Draft: Habitats Regulations Assessment. Footprint Ecology, December 2016.

3.0 Habitat Regulations Assessment Methodology

3.1 The Conservation of Habitats and Species Regulations 2010 (the Regulations) impart a duty on Local Planning Authorities (competent authorities) to carefully consider whether any proposals may have a significant effect on a European site, either alone or in combination with other plans or projects. The approach to the formalised assessment of potential impacts arising on a European site from any proposals (termed plans or projects) is set out within the Regulations.

3.2 The procedure for assessment is an ordered process following a number of key stages, as laid out within the chart within the Office of the Deputy Prime Minister (2005) "*Government Circular: Biodiversity and Geological Conservation - Statutory Obligations and their Impact within the Planning System*" (ODPM circular 06/2005) and discussed below.

Stage 1

3.3 The first stage is to identify whether the proposals are directly connected with or necessary to site management for conservation.

3.4 Where the proposals are not concerned with the management of the European sites, the assessment procedure should follow on to Stage 2.

Stage 2

3.5 Following to stage 2, it is next necessary to examine if the proposals will result in any 'likely significant effect' on the internationally important features of the European sites, either alone or in combination with other plans or projects.

3.6 Where it is considered that plans or projects will result in no such 'likely significant effects', no further assessment is necessary and permission should not be refused under the assessment.

3.7 If any 'likely significant effects' are identified or where it remains unclear whether effects will be significant the assessment procedure should follow on to Stage 3.

Stage 3 onwards

3.8 Should it be determined that a plan or project will result in 'likely significant effects' on a European site, a full 'Appropriate Assessment' of the likely effects of the plan or project, to be undertaken by the Competent Authority, is required.

4.0 Screening for Likely Significant Effects

Background Information

4.1 Footprint Ecology undertook a Habitats Regulations Assessment of the South East Lincolnshire Local Plan Publication Draft in December 2016 on behalf of the South East Lincolnshire Joint Strategic Planning Committee (the competent authority).

4.2 The production of a Local Plan proceeds through a number of stages, with the accompanying HRA being updated at each iteration and feeding into the next. As such, the HRA of the Local Plan may be considered as a draft document until the Local Plan is finalised. Nonetheless, it is considered that the emerging Plan and its associated HRA are well advanced and the broad conclusions and recommendations of the HRA may at this stage be relied upon.

4.3 The HRA process has considered all international ecological designations within 20km of the Local Plan area (South Holland District and Boston Borough), including re-checking of sites screened out from requiring any further consideration in previous iterations of the HRA. The HRA first identifies those sites which are potentially relevant to the HRA and then considers these sites within the screening process to identify whether there are any likely significant effects arising from the Local Plan.

4.4 The HRA then considers in more detail those five sites identified for inclusion within the screening process. The results of this screening process are set out within Table 1 below.

Table 1

European Sites considered for their relevance to the South East Lincolnshire Local Plan

European Site	Screening for potential relevance to Local Plan	Screening for Likely Significant Effects (LSE)
Baston Fen SAC	Include in screening	Screened out
The Wash & North Norfolk Coast SAC	Include in screening	Screened out
The Wash SPA/Ramsar site	Include in screening	LSE identified
Nene Washes SPA/SAC/Ramsar site	Exclude	N/A
Gibraltar Point SPA/Ramsar site	Include in screening	LSE identified
Saltfleetby-Theddlethorpe Dunes & Gibraltar Point SAC	Include in screening	Screened out
North Norfolk Coast SPA/SAC	Exclude	N/A

Barnack Hills and Holes SAC	Exclude	N/A
Grimsthorpe SAC	Include	Screened out
Ouse Washes SAC/Ramsar site	Exclude	N/A
Orton Pit SAC	Exclude	N/A
Roydon Common & Dersingham Bog SAC/Ramsar sites	Exclude	N/A

4.5 As set out within Table 1, the HRA of the Local Plan identified that likely significant effects might arise from the plan policies in respect of the bird interest of The Wash and Gibraltar Point designations (i.e. the SPA and Ramsar designations relating to these two sites). These were considered further within the HRA.

4.6 The HRA identifies the source of a likely significant effect as being an increase in recreational pressure arising from delivery of the quantum of new housing proposed in the Local Plan. This is then considered in some detail, with discussion informed by a Wash Visitor Survey, again undertaken by Footprint Ecology and published in 2016. Options for mitigation identified within the HRA have been incorporated into the current version of the Local Plan, in Policy 24 as set out above.

Screening of Current Project

4.7 Stage 1: As noted above, the first stage is to identify whether the proposals are directly connected with or necessary to site management for conservation. The current proposals are not concerned with management of the European sites; hence the procedure should follow on to Stage 2.

4.8 Stage 2: On the basis of the findings of the HRA of the Local Plan, and understanding that Natural England has confirmed it considers the current version of the Plan 'sound', this document considers the proposals for land east of Seagate Road should be screened for likely significant effects arising, alone or in-combination, from increased recreational pressure on The Wash and Gibraltar Point SPA/Ramsar sites. Likely significant effects arise through the potential for increased recreational access to or in the vicinity of the designations to cause disturbance to the internationally important bird populations supported by these sites.

4.9 The findings of Footprint's Wash Visitor Study (2016) are considered in more detail in subsequent sections of this document. However, one key finding from visitor surveys was that 75% of all visitors lived within a radius of 28.7km from the location where interviewed.

4.10 As noted at 2.3 above, the application site is located approximately 37km from Gibraltar Point. This straight-line distance equates to an actual car journey of 72km with an estimated journey time of 1 hour 15 minutes (source: Google Maps), so the application

site is well beyond the 'catchment zone' for most visitors. While new residential development at Long Sutton clearly has some potential to generate visits to Gibraltar Point, it is considered that at this degree of separation there is no meaningful scope for any likely significant effect to arise. Indeed, the HRA of the Local Plan excludes the North Norfolk Coast SPA/SAC at the screening stage on the basis of the longer travel time to reach this site from south east Lincolnshire. Since in this case the distance and journey time to Gibraltar Point is significantly greater, it is concluded that recreational effects on Gibraltar Point may be screened out of a project level appropriate assessment.

- 4.11 At its closest point to the designation, the application site is located 6.9km from The Wash SPA/Ramsar site. Accordingly, recreational effects on this designation cannot be screened out and the assessment should proceed on to Stage 3, a full appropriate assessment.

5.0 The Wash SPA and Ramsar Site: Features and Vulnerabilities

Description and Interest Features

5.1 The Wash² is located on the east coast of England and is the largest estuarine system in the UK. It is fed by the rivers Witham, Welland, Nene and Great Ouse that drain much of the east Midlands of England. The Wash comprises very extensive saltmarshes, major intertidal banks of sand and mud, shallow waters and deep channels. The eastern end of the site includes low chalk cliffs at Hunstanton. In addition, on the eastern side, the gravel pits at Snettisham are an important high-tide roost for waders. The intertidal flats have a rich invertebrate fauna and colonising beds of Glasswort *Salicornia* spp. which are important food sources for the large numbers of waterbirds dependent on the site. The sheltered nature of The Wash creates suitable breeding conditions for shellfish, principally Mussel *Mytilus edulis*, Cockle *Cardium edule* and shrimps. These are important food sources for some waterbirds such as Oystercatchers *Haematopus ostralegus*. The Wash is of outstanding importance for a large number of geese, ducks and waders, both in spring and autumn migration periods, as well as through the winter. The SPA is especially notable for supporting a very large proportion (over half) of the total population of Canada/Greenland breeding Knot *Calidris canutus islandica*. In summer, the Wash is an important breeding area for terns and as a feeding area for Marsh Harrier *Circus aeruginosus* that breed just outside the SPA.

5.2 This site qualifies under **Article 4.1** of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:

During the breeding season;

- Common Tern *Sterna hirundo*, 152 pairs representing at least 1.2% of the breeding population in Great Britain (Count, as at 1993)
- Little Tern *Sterna albifrons*, 33 pairs representing at least 1.4% of the breeding population in Great Britain (5 year mean, 1992-1996)
- Marsh Harrier *Circus aeruginosus*, 15 pairs representing at least 9.4% of the breeding population in Great Britain (Count as at 1995)

Over winter;

- Avocet *Recurvirostra avosetta*, 110 individuals representing at least 8.7% of the wintering population in Great Britain (5 year peak mean 1991/2 - 1995/6)

² Information from JNCC website <http://jncc.defra.gov.uk/default.aspx?page=2003> accessed 21/10/2017

- Bar-tailed Godwit *Limosa lapponica*, 11,250 individuals representing at least 21.2% of the wintering population in Great Britain (5 year peak mean 1991/2 - 1995/6)
- Golden Plover *Pluvialis apricaria*, 11,037 individuals representing at least 4.4% of the wintering population in Great Britain (5 year peak mean 1991/2 - 1995/6)
- Whooper Swan *Cygnus cygnus*, 68 individuals representing at least 1.2% of the wintering population in Great Britain (5 year peak mean 1991/2 - 1995/6)

5.3 This site also qualifies under **Article 4.2** of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:

On passage;

- Ringed Plover *Charadrius hiaticula*, 1,185 individuals representing at least 2.4% of the Europe/Northern Africa - wintering population (5 year peak mean 1991/2 - 1995/6)
- Sanderling *Calidris alba*, 1,854 individuals representing at least 1.9% of the Eastern Atlantic/Western & Southern Africa - wintering population (2 year mean Aug 1994 - 1995)

Over winter;

- Black-tailed Godwit *Limosa limosa islandica*, 859 individuals representing at least 1.2% of the wintering Iceland - breeding population (5 year peak mean 1991/2 - 1995/6)
- Curlew *Numenius arquata*, 3,835 individuals representing at least 1.1% of the wintering Europe - breeding population (5 year peak mean 1991/2 - 1995/6)
- Dark-bellied Brent Goose *Branta bernicla bernicla*, 22,248 individuals representing at least 7.4% of the wintering Western Siberia/Western Europe population (5 year peak mean 1991/2 - 1995/6)
- Dunlin *Calidris alpina alpina*, 35,620 individuals representing at least 2.5% of the wintering Northern Siberia/Europe/Western Africa population (5 year peak mean 1991/2 - 1995/6)
- Grey Plover *Pluvialis squatarola*, 9,708 individuals representing at least 6.5% of the wintering Eastern Atlantic - wintering population (5 year peak mean 1991/2 - 1995/6)

- Knot *Calidris canutus*, 186,892 individuals representing at least 53.4% of the wintering Northeastern Canada/Greenland/Iceland/Northwestern Europe population (5 year peak mean 1991/2 - 1995/6)
- Oystercatcher *Haematopus ostralegus*, 25,651 individuals representing at least 2.9% of the wintering Europe& Northern/Western Africa population (5 year peak mean 1991/2 - 1995/6)
- Pink-footed Goose *Anser brachyrhynchus*, 33,265 individuals representing at least 14.8% of the wintering Eastern Greenland/Iceland/UK population (5 year peak mean 1991/2 - 1995/6)
- Pintail *Anas acuta*, 923 individuals representing at least 1.5% of the wintering Northwestern Europe population (5 year peak mean 1991/2 - 1995/6)
 - Redshank *Tringa totanus*, 2,953 individuals representing at least 2.0% of the wintering Eastern Atlantic - wintering population (5 year peak mean 1991/2 - 1995/6)
- Shelduck *Tadorna tadorna*, 15,981 individuals representing at least 5.3% of the wintering Northwestern Europe population (5 year peak mean 1991/2 - 1995/6)
- Turnstone *Arenaria interpres*, 717 individuals representing at least 1.0% of the wintering Western Palearctic - wintering population (5 year peak mean 1991/2 - 1995/6)

Assemblage qualification: A wetland of international importance.

5.4 The area qualifies under **Article 4.2** of the Directive (79/409/EEC) by regularly supporting at least 20,000 waterfowl

- Over winter, the area regularly supports 400,273 individual waterfowl (5 year peak mean 1991/2 - 1995/6) including: Black-tailed Godwit *Limosa limosa islandica*, Avocet *Recurvirostra avosetta*, Golden Plover *Pluvialis apricaria*, Bar-tailed Godwit *Limosa lapponica*, Pink-footed Goose *Anser brachyrhynchus*, Dark-bellied Brent Goose *Branta bernicla bernicla*, Shelduck *Tadorna tadorna*, Pintail *Anas acuta*, Oystercatcher *Haematopus ostralegus*, Grey Plover *Pluvialis squatarola*, Whooper Swan *Cygnus cygnus*, Dunlin *Calidris alpina alpina*, Sanderling *Calidris alba*, Curlew *Numenius arquata*, Redshank *Tringa totanus*, Turnstone *Arenaria interpres*, Little Grebe *Tachybaptus ruficollis*, Cormorant *Phalacrocorax carbo*, White-fronted Goose *Anser albifrons albifrons*, Wigeon *Anas penelope*, Mallard *Anas platyrhynchos*, Ringed Plover *Charadrius hiaticula*, Lapwing *Vanellus vanellus*, Knot *Calidris canutus*, Whimbrel *Numenius phaeopus*.

5.5 The Wash is also designated as a Ramsar site, contiguous with the SPA, being designated

on the basis of a range of criteria as set out below:

Ramsar Criterion 1

- The Wash is a large shallow bay comprising very extensive saltmarshes, major intertidal banks of sand and mud, shallow water and deep channels.

Ramsar Criterion 3

- Qualifies because of the inter-relationship between its various components including 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.

Ramsar Criterion 5

- Assemblages of international importance: Species with peak counts in winter: 292541 waterfowl (5 year peak mean 1998/99 – 2002/2003).

Ramsar Criterion 6

- Species/populations occurring at levels of international importance. Qualifying Species/populations (as identified at designation): Species with peak counts in spring/autumn: Eurasian Oystercatcher *Haematopus ostralegus ostralegus*, Europe and NW Africa - wintering 15616 individuals, representing an average of 1.5% of the population (5 year peak mean 1998/9 – 2002/3); Grey Plover *Pluvialis squatarola*, E Atlantic / W Africa – wintering 13129 individuals, representing an average of 5.3% of the population (5 year peak mean 1998/9 – 2002/3 – spring peak); Red Knot *Calidris canutus islandica*, W and Southern Africa (wintering) 68987 individuals, representing an average of 15.3% of the population (5 year peak mean 1998/9 – 2002/3); Sanderling *Calidris alba*, East Atlantic 3505 individuals, representing an average of 2.8% of the population (5 year peak mean 1998/9 – 2002/3); Eurasian Curlew *Numenius arquata arquata*, Europe (breeding) 9438 individuals, representing an average of 2.2% of the population (5 year peak mean 1998/9 – 2002/3); Common Redshank *Tringa totanus totanus*, 6373 individuals, representing an average of 2.5% of the population (5 year peak mean 1998/9 – 2002/3); Ruddy Turnstone *Arenaria interpres interpres*, NE Canada, Greenland / W Europe and NW Africa 888 individuals, representing an average of 1.7% of the GB population (5 year peak mean 1998/9 – 2002/3). Species with peak counts in winter: Pink-footed Goose *Anser brachyrhynchus*, Greenland, Iceland/UK 29099 individuals, representing an average of 12.1% of the population (5 year peak mean 1998/9 – 2002/3); Dark-bellied Brent Goose *Branta bernicla bernicla*, 20861 individuals, representing an average of 9.7% of the population (5 year peak mean 1998/9 – 2002/3); Common Shelduck *Tadorna tadorna*, NW Europe 9746 individuals, representing an average of 3.2% of the population (5 year peak mean

1998/9 – 2002/3); Northern Pintail *Anas acuta*, NW Europe 431 individuals, representing an average of 1.5% of the GB population (5 year peak mean 1998/9 – 2002/3); Dunlin *Calidris alpina alpina*, W Siberia / W Europe 36600 individuals, representing an average of 2.7% of the population (5 year peak mean 1998/9 – 2002/3); Bar-tailed Godwit *Limosa lapponica lapponica*, W Palearctic 16546 individuals, representing an average of 13.7% of the population (5 year peak mean 1998/9 – 2002/3). Species / populations identified subsequent to designation for possible future consideration under Criterion 6. Species with peak counts in spring/autumn: Ringed Plover *Charadrius hiaticula*, Europe / NW Africa 1500 individuals, representing an average of 2% of the population (5 year peak mean 1998/9 – 2002/3); Black-tailed Godwit *Limosa limosa islandica*, Iceland / W Europe 6849 individuals, representing an average of 19.5% of the population (5 year peak mean 1998/9 – 2002/3). Species with peak counts in winter: European Golden Plover *Pluvialis apricaria apricaria*, *P. a. altifrons* Iceland and Faroes / E Atlantic 22033 individuals, representing an average of 2.3% of the population (5 year peak mean 1998/9 – 2002/3); Northern Lapwing *Vanellus vanellus*, Europe – breeding 46422 individuals, representing an average of 1.4% of the population (5 year peak mean 1998/9 – 2002/3).

Vulnerabilities

5.6 There is a variety of evidence that disturbance caused by human presence within or close to important wildlife areas can have negative impacts on key species. This is particularly the case with birds, with ground-nesting birds being particularly vulnerable during the breeding season (e.g. Taylor, 2006³). Birds of estuaries (wildfowl and waders) have also been identified as particularly susceptible to human disturbance, with consequences likely to be particularly harmful during periods of particularly cold weather (e.g. see Davidson & Rothwell, 1993⁴; Stillman & Goss-Custard, 2002⁵). Several studies have found that people walking dogs frequently cause particularly high levels of disturbance (e.g. see English Nature (now Natural England) report ENRR 649⁶). Disturbance has been identified by Natural England as a generic issue across many European Marine Sites (Coyle & Wiggins 2010⁷).

5.7 Footprint Ecology's Wash Visitor Survey makes reference (p 58) to unpublished work undertaken by Natural England to identify which estuary SPA sites are likely to be most

³ Taylor, E.C. 2006 Stone Curlews *Burhinus oedecnemus* and human disturbance: effects on behaviour, distribution and breeding success. PhD Thesis, Cambridge University

⁴ Davidson, N.C. & Rothwell, P.I. 1993 Human disturbance to waterfowl on estuaries: conservation and coastal management implications of current knowledge. Wader Study Group Bulletin, 1993

⁵ Stillman, R.A. & Goss-Custard, J.D. 2002 Seasonal changes in the response of oystercatchers *Haematopus ostralegus* to human disturbance. J. Avian Biol., 33, 358-365

⁶ Taylor, K., Anderson, P., Taylor, R., Longden, K. & Fisher, P. (2005) Dogs, Access and Nature Conservation English Nature Research Report 649

⁷ Coyle, M. & Wiggins, S. (2010) European Marine Site Risk review. Natural England Research Report NERR308

vulnerable to further increases in housing density. This study identifies small estuaries, with existing high levels of housing nearby and good public access facilities as being likely to be under the most pressure. With its large size (over 62,000 ha) and low levels of existing housing), the Wash appears to be one of the least vulnerable sites in England. Indeed, examination of Site of Special Scientific Interest (SSSI) Impact Risk Zones (IRZ) on Defra's MAGIC⁸ on-line database finds that, in the vicinity of Long Sutton, new residential development is not identified as being of concern beyond approximately 2km from The Wash SSSI. While the IRZ relates to interest features of the SSSI rather than the SPA designation, these features inevitably include those identified in the European level designation. A review of current condition assessments of the SSSI Units reveals that all those in the vicinity of Long Sutton are in favourable or unfavourable recovering condition (although it is noted that the condition assessments appear to be primarily based on habitat condition rather than bird numbers). As such, notwithstanding the proposed policy in the emerging Local Plan, it does not appear that current levels of recreational visits to The Wash are at present a major cause of concern to Natural England.

5.8 However, the emerging Local Plan is proposing a quantum of residential development within the Plan period representing an increase in housing stock of approximately 28%, with certain large-scale development proposals being in relatively close proximity to The Wash (sites Sou006, Pin024/145 and Hob048). On the basis of the Plan proposals, The Wash Visitor Survey predicts an increase in recreational access over the Plan period of approximately 10%. As identified within the HRA of the Local Plan, the ecological effects of disturbance can be difficult to quantify, while new residential development would represent a permanent change. Taking a precautionary approach, a significant effect from nearby development cannot be ruled out. However, taking into account the current relatively low levels of recreational access and the nature of the designation itself, in particular the vast extent of low tide feeding areas, any effects of increased recreational access are considered most likely to relate to high tide roost sites, potentially including agricultural fields outside the SPA/Ramsar site boundary.

5.9 No specific features of elevated interest within the context of the designation have been identified in the vicinity of Long Sutton. However, there appears to be a lack of available data in relation to any specific features of elevated significance (other than the presence of an important and well known high tide roost location on gravel pits at Snettisham).

⁸ Multi-Agency Geographic Information for the Countryside www.natureonthemap.naturalengland.org.uk

6.0 Local Access Opportunities to The Wash from Long Sutton

6.1 On the basis of OS mapping and online aerial photography, five access points to the SPA / Ramsar site were visited between the outfalls of the River Welland to the north of Long Sutton and the River Great Ouse to the east (effectively covering all of The Wash within a straight-line distance of up to 15km from the site). The access locations were identified without reference to the Wash Visitor Survey. However, these five locations were all included within that survey. (The Visitor Survey identified no additional access points in this area.)

6.2 The access points identified are (from west to east):

- Barge Road, Holbeach St Matthew
- Gedney Drove End
- Sutton Bridge West
- Sutton Bridge East
- Ongar Hill

6.3 In the descriptions below, all distances are to the associated car parking locations rather than to the SPA. All sites were visited over a September weekend. The weather was varied, with a mix of sunshine and showers, but relatively mild.

6.4 **Holbeach St Matthew:** This access point ('Shep White's car park') is located approximately 12km (straight line) and 16km (driving route) from the application site. The site has a very 'remote' feel, being accessed by single track roads and is not signposted. The road leading to the parking area is in poor condition with many large potholes. Although rather rough, the parking area can accommodate several vehicles. One other vehicle, possibly belonging to a wildfowler, was seen at this location at the time of the visit.

6.5 The coastal footpath, as at the other access locations surveyed, runs along the top of the sea wall. Alternative, inland, routes are available from this location but a circular walking route, likely to be preferred by most walkers, would involve walking along the sea bank adjacent to the saltmarsh which is extensive at this location.

6.6 Footprint's Wash Visitor Survey recorded an average of 4.3 people/hour visiting this location, compared with an overall average for all locations covered by the survey of 4.6 people/hour. The Visitor Survey also recorded that approximately 20% of visitors to this location were wildfowlers. Somewhat surprisingly, given its apparent remoteness, this location appears to draw visitors from a relatively wide area, with a median distance between the location and visitors' home postcodes of 10.5km, the greatest of any of the survey locations other than Gibraltar Point and Frampton Marsh, both these being relatively high-profile nature reserves likely to draw visitors from considerable distances.

6.7 **Gedney Drove End:** This access point is located 8.5km (straight line distance) and 11.6km (driving route) from the application site. The narrow road becomes a drivable track

leading to a barrier at the sea wall, with limited parking due to the narrowness of the track and its location on a raised bank (an old sea bank) above the adjacent land. There is an alternative parking location southeast of this access point, with roadside parking for approximately 10 cars off Marsh Lane, approximately 10.0km driving distance from Long Sutton. A Wash National Nature Reserve (NNR) information board is located on the sea bank at this access location. The sign provides a map, together with some general information about the NNR and a request to keep dogs under effective control. There is also a section warning that parts of the reserve are dangerous (deep pools, soft mud, etc.) and requesting visitors to keep to the sea bank. Other footpaths in the area run along old sea banks, some leading to the sea wall marking the SPA boundary. However, these lack parking areas nearby. Several signs identifying shooting rights (Gedney Drove End & District Wildfowling) were observed in the vicinity.

6.8 The more distant access point has the advantage that cars can be parked immediately next to the sea wall, while a well surfaced roadway that walkers can follow runs for some distance to the north, slightly below the top of the wall. The roadway is assumed to be used by the RAF, with the adjacent salt marsh north to Holbeach St Matthew being identified on OS maps as a Danger Area.

6.9 At the time of the visit, a single other vehicle was present, with two people, the presumed owners, seen walking dogs along the roadway. An interpretation board is located close to the access point to the sea bank.

6.10 The Visitor Survey identified Gedney Drove End as having a median distance to visitors' home post codes of 7.8km, with a recorded 3.4 people/hour visiting.

6.11 **Sutton Bridge West (Guy's Head):** This site is located at a straight-line distance of 6.4km from Long Sutton, with a driving distance of 9.0km. Although relatively close to the village of Sutton Bridge, the parking location, by the former lighthouse, is very 'low key', with limited, unmarked roadside parking for up to approximately 8 vehicles adjacent to the River Nene. Two other vehicles were present at the time of the visit. Two people were seen apparently taking water samples from Lutton Leam at a location close to its outfall into the Nene.

6.12 The public right of way initially follows the raised bank of the Nene for approximately 800m before reaching coastal saltmarsh. Again, there are signs identifying wildfowling rights. Following the footpath to the saltmarsh (alternative rights of way being available on former sea banks a short distance inland) another NNR information board is reached, at the base of the bank on the edge of the saltmarsh. The sign provides the same information as that at Gedney Drove End.

6.13 The Visitor Survey recorded visits to this location at an average rate of 3.6 people/hour, with a median distance to home postcode of 5.1km.

6.14 **Sutton Bridge East (East Bank):** This location is 6.5km (straight line) and 10.0km (driving route) from Long Sutton. It is almost directly opposite Sutton Bridge West, on the opposite

side of the River Nene. A well maintained car park is located adjacent to a picnic area (East Bank Picnic Site). The picnic area is signposted from the A17 just outside Sutton Bridge. The public right of way follows the east bank of the Nene past the Sir Peter Scott Lighthouse (East Lighthouse), again for approximately 800m before arriving at the coastal saltmarsh. The only public right of way follows the sea bank eastwards towards Admiralty Point and the River Great Ouse (the 'Peter Scott Walk'). A further NNR sign was seen, again providing the same information.

6.15 Three cars were in the car park at the time of visit and approximately six walkers were seen. The Visitor Survey recorded an average of 6.0 people/hour visiting this location (with particularly high numbers during the November survey), and with a median visitor postcode distance of 9.0km. This relatively large visitor catchment is considered to be a reflection of the ease of access, a short distance from the A17, with a good-sized car park and picnic facilities, advertised on the Lincolnshire County Council website, and with the added attraction of the lighthouse. Of all the access locations visited, this was considered to be the easiest to locate, with the best approach roads and parking facilities.

6.16 **Ongar Hill:** This location is 14.7km (straight line) and 20.9km (driving route) from Long Sutton. Parking for several cars is available at the end of the road, and a footpath, apparently only lightly used, leads between arable fields to the sea wall approximately 470m away. No other cars were seen in the parking area during the visit, although a single walker was seen on the sea wall, heading east. A further NNR sign, again with the same wording as previously seen, is located at the (inland) base of the sea wall.

6.17 The visitor survey recorded visits at a rate of 2.1 people/hour, with a median postcode distance of 5.6km.

Summary of Local Access opportunities

6.18 Access to the Wash is available at several locations within a few kilometres of Long Sutton. These locations all offer car parking, but most have a very rural, remote feel to them. The easiest access point to find, and the one most likely to come to the attention of new residents, is considered to be the one at Sutton Bridge East (East Bank Picnic Site). This had a relatively high median distance to visitors' home postcode, although only 9.0km, so is still considered to be only a relatively local attraction.

6.19 All the locations visited, other than where footpaths followed river banks, have footpaths along the sea wall that adjoin extensive areas of saltmarsh to the seaward side, with arable farmland inland.

6.20 While residents of the proposed development at Long Sutton could visit the Wash at any of the locations considered above, the access location considered most likely to be used is Sutton Bridge East. This conclusion is supported by consideration of Map 8 within the Wash Visitor Survey report, illustrating convex hulls formed from the closest 50% of home postcodes to each survey location.

7.0 Potential Effects of Increased Recreational Access

- 7.1 Bird survey data for the Wash is available in the form of WeBS data, comprising counts of birds in numerous sectors within the Wash. However, bird locations will vary depending on a variety of factors, notably the state of the tide but also the levels of disturbance in different locations. As such, with the potential for disturbance levels to increase as new housing is delivered in south east Lincolnshire, it is considered that no areas can be confidently identified on the basis of bird counts, as locations where birds would not be disturbed by increasing levels of public access.
- 7.2 It is also the case that the identified presence of birds does not, in itself, indicate whether or not disturbance would actually occur. To investigate the potential for disturbance to occur in the vicinity of Sutton Bank East, the location considered most likely to experience a detectable increase in visitor numbers as a result of the proposed development at Long Sutton, a survey was undertaken on 19th November at high tide (c. 06.36hrs). The tide was not a spring tide, but was relatively high, reaching 6.6m AOD.
- 7.3 The site was walked from the car park along the sea wall, initially parallel to the River Nene and then eastwards along the edge of the saltmarsh for a total distance of approximately 3.5km, within 45 minutes of high tide, returning on the same path. Low numbers of Redshank (approximately 4 birds) and a pair of Mallard were considered to have been flushed by the surveyor, although potentially other birds, not seen within saltmarsh vegetation, could have experienced disturbance but not been provoked to flight.
- 7.4 During the survey, numerous waterfowl, including Curlew, Dunlin, Redshank, Shelduck, Brent Goose and Black-tailed Godwit were observed on the lower edge of the saltmarsh, apparently at the edge of the open water. On this tide, the birds were well beyond any disturbance zone that would be generated by walkers on the sea wall.
- 7.5 Low numbers of waders (Ruff) were observed along the rocky revetment of the River Nene, although disturbance of birds here is considered unlikely, because of restricted levels of visibility due to the vertical distance between the footpaths on the sea wall on either side of the river and the river level location of the birds, resulting in birds only being directly observable from the footpath on the opposite bank.
- 7.6 Occasional Redshank and Black-tailed Godwit were also noted, feeding and lounging in shallow marginal waters of the drainage channels at the inland base of the sea wall. Again, disturbance is generally unlikely to result from bank top walkers because of generally restricted sight lines.
- 7.7 Most arable fields adjacent to the sea wall held no waterfowl at the time of survey. However, on the return route, a flock of 67 Golden Plover were noted to land in one field, with a further c. 250 Golden Plover flying over but not landing. The birds within the field were estimated to be within 100m of the sea wall. They did not obviously respond to the presence of the surveyor as he passed the flock.

- 7.8 It is concluded that at most times, and even on most high tides, disturbance to birds from walkers following the sea wall footpaths will be minimal. However, it is likely that on the highest spring tides, many more birds would be forced to move considerably closer to the sea wall, potentially roosting within nearby arable fields. On these occasions, disturbance would potentially be sufficient to cause large numbers of birds to take flight, moving to more remote locations. The presence of dogs, particularly dogs running off lead, would significantly increase the likelihood of disturbance occurring.
- 7.9 During discussions, the WeBS survey co-ordinator for the Wash noted that dogs off-lead had also been noted to cause disturbance to nesting Redshank during summer months.

8.0 Assessment of The Application Site

8.1 The application site comprises arable land on the southern edge of Long Sutton. No public rights of way run through or immediately adjacent to the site. However, the site is used by number of local dog walkers. In addition, there is a public footpath running west from Seagate Road, at its closest point being approximately 140m from the site. This footpath continues westwards for approximately 600m. At this point it reaches a small drainage channel / watercourse, with the right of way continuing south towards the A17 and north towards Long Sutton. The southern route does provide a circular walking route, but this involves crossing the A17 road twice, which is likely to be a deterrent to regular use, with the final 0.75 km being along Seagate Road itself. The northern route involves walking through residential parts of Long Sutton to achieve a circular route. Alternatively, a walk across the fields to the edge of town, returning on the same route provides a walk from the boundary of the application site of approximately 2.7km. From a review of OS mapping, there appear to be relatively few other public rights of way in the countryside around Long Sutton.

9.0 Assessment of Effects of the Proposals on the Wash SPA / Ramsar Site

- 9.1 This assessment relates only to potential recreational disturbance effects on The Wash arising from the increased population of Long Sutton associated with the proposed development of approximately 215 dwellings. The site is located over 6km from The Wash, so no construction effects are anticipated. Neither does the site represent or adjoin supporting habitat for bird species associated with the designation. The potential for effects to arise are considered from the site in isolation and cumulatively with other development, 'other development' in this instance being taken to be development proposed within the emerging Local Plan.
- 9.2 Overall, Footprint Ecology's Visitor Survey predicts an increase in recreational pressure on The Wash as a result of new development proposed in the Local Plan for 2011-2036 of approximately 10%. For Long Sutton, the identified allocation of land for a total of 560 new homes is predicted by the Visitor Survey to result in a 25% increase in recreational access by residents of Long Sutton, the new development representing an increase in housing stock within the town of 25%. It is understood that this is calculated on the basis of new development drawing in occupiers new to the area. In practice, a proportion of residents of new development will comprise local residents moving from elsewhere within the area, with a corresponding reduction in average household size. As such, the actual population increase could be lower than anticipated. Nonetheless, assuming a 'worst case scenario' in relation to the present application site (215 units), this would result in an increase in recreational access from Long Sutton of approximately 9.5%. Extrapolating from the Visitor Survey results, in which 4.2% of local (Lincolnshire) visitors gave a Long Sutton home postcode, the proposed development of c. 215 new homes in Long Sutton would contribute an estimated increase of 0.4% of current visitor levels arising within Lincolnshire, and approximately 0.3% of all visits.
- 9.3 Given that current visitor levels have not been identified as damaging to the effective conservation of the interest features of the SPA / Ramsar site, it is concluded that, considered in isolation, the effects of the proposals are not significant. This is particularly considered to be the case because it is predicted that the majority of additional visits generated would be to the Sutton East access point. While no specific information has been identified to determine whether there are any key ecological features, such as high tide roosts, within the vicinity of this access point, the site is already relatively well used, so birds may be more habituated to human presence than at less frequently visited locations. Visitor Survey information also indicates visitors very largely keep to rights of way at this location. The results of the survey visit undertaken by Greenwillows Ltd at high tide suggest that for the great majority of the time (i.e. other than exceptionally high tides) disturbance from visitors would be no more than minor.
- 9.4 However, considered in combination with other residential development proposed within the emerging Local Plan, the site is seen to be contributing to a predicted overall increase in recreational visits of approximately 10%. From the Visitor Survey results it is apparent

that one of the attractions of visiting the Wash is that it is 'away from the crowds'. As such, if visitor numbers increase at a particular location, this may cause some users to look for other, less well used access locations.

- 9.5 Although some opportunities for walkers, including dog walkers, are present in close proximity to the application site, these are limited and the attraction of coastal locations would doubtless result in some additional visits to the SPA/Ramsar site arising from the proposed development. Levels of disturbance generated, and any potentially significant associated effects on the bird populations, would depend very much on the state of the tide and the behaviour of the visitors and their dogs.

Conclusion

- 9.6 It is concluded that the proposed development of land east of Seagate Road would in isolation have no likely significant effect on the Wash designations. However, it would make a minor contribution to increased recreational pressure on the Wash SPA/Ramsar site resulting from cumulative development as identified in the emerging Local Plan. Although the Wash is considered to be at relatively low risk of significant adverse effects arising from increased recreational access, the potential for significant adverse effects to arise cannot be dismissed with the high degree of certainty required in relation to Habitats Regulations Assessments. Accordingly, the proposals are considered to make a very small contribution to possible cumulative effects of development. On this basis, the following section sets out proportionate precautionary mitigation measures.

10.0 Mitigation Measures

- 10.1 Policy 24 of the emerging Local Plan sets out that, other than for the major development locations in Boston, Spalding and Holbeach (for which SANG provision is required), all major housing proposals should provide SANGs on-site and/or through a financial contribution to provide and/or enhance natural greenspace in the locality.
- 10.2 SANG provision along the lines of that required for development likely to impact designations such as the Thames Basin Heaths SPA may be feasible for standalone delivery of very large developments. However, at the lower end of 'major' residential development, SANG provision is much more likely to be effectively delivered through developer contributions to a strategic scheme under the control of the Local Authority. Indeed, while the Local Plan identifies 'major' development as being required to provide mitigation, in fact all new residential development would be making a contribution to increased recreational access and, as such, should be expected to contribute to providing mitigation of overall effects that might arise. (NB some similar strategic schemes are already in embryonic development in other counties).
- 10.3 In the case of the current development proposals, these appear to be being brought forward in advance of any strategic proposals to which a proportionate financial contribution could be made. In the absence of a strategic scheme, the developer has no opportunity to commit to works on land outside his control. Assuming this to be the case, the following proposals are considered to represent sufficient mitigation for the development's potential contribution to increased recreational pressures on The Wash that would occur in the absence of mitigation.
- 10.4 It is proposed to create a pedestrian route around the perimeter of the site. It is anticipated that this would amount to a walking route of approximately 1.2km. It would incorporate and enhance a route currently used informally by local dog walkers. The route would be fenced so it is safe for dogs to run off lead and the area would be sown / planted using native species to provide an attractive semi-natural habitat. To enhance the attractiveness of the route additional features such as a human / dog trim trail could be considered together with faeces deposit bins. The total area of semi-natural greenspace that would be provided within the development site would be 2.2ha. The objective of this provision would be to accommodate routine daily walking / dog walking requirements of residents of the new development.
- 10.5 In addition, leaflets would be provided to all residents identifying other walking routes in the vicinity of Long Sutton, including reference to information available from the Local Authority. It is suggested that the leaflet should include information on The Wash, including the Sutton Bridge East location, explaining the importance of keeping dogs under close control and keeping to public footpaths.
- 10.6 It is suggested that full details of these two measures would be subject to planning condition requiring that the Local Authority must approve proposals in writing. Conditions

could also specify timing of delivery of a complete and functional walking route; it is anticipated that this would be in advance of first occupation.

11.0 Conclusions

- 11.1 This document provides information to assist the competent authority to undertake an appropriate assessment of the development proposals for land east of Seagate Road, Long Sutton.
- 11.2 It is concluded that The Wash is at relatively low risk of significant adverse effects arising from increased recreational access pressures arising from cumulative residential development as proposed in the emerging South East Lincolnshire Local Plan 2011-2036. Nonetheless, an increase in recreational visits of approximately 10% is anticipated to result from the Local Plan proposals and adverse effects cannot be ruled out. On that basis the Local Plan proposes mitigation involving provision of SANG or financial contributions to creation or enhancement of greenspace in the vicinity of new development.
- 11.3 Effects arising from the proposed development of land east of Seagate Road are considered to be minor and not significant in isolation. However, they do make a small contribution to potential cumulative effects. Therefore, in the absence of a strategic scheme to which the developer could make a financial contribution, mitigation is proposed in the form of creation of an attractive circular walking route around the development site, following SANG principles, together with provision of written advice to new householders on local opportunities for walking. This advice would explain the importance and sensitivities of The Wash SPA/ Ramsar site.
- 11.4 It is considered that these measures would represent proportionate mitigation of any effects on the SPA/Ramsar site and the appropriate assessment could conclude there would be no residual effect.