Norfolk Coast Partnership

Norfolk Coast National Landscape Management Plan 2025-30

Habitats Regulations Assessment Screening Report

Final report

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Habitats Regulations Assessment Screening Report

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Chapter 1
Introduction

1.1 LUC has been commissioned by Norfolk Coast Partnership (hereafter referred to as 'NCP') to carry out a Habitats Regulations Assessment (HRA) of the Norfolk Coast National Landscape Management Plan (hereafter referred to as 'the Management Plan').

1.2 A new Management Plan for 2025-30 has been drafted and was consulted on for six weeks until the 5th of December 2025. This HRA Screening Report provides an assessment of the potential for impacts to arise (if any) as a result of the new Management Plan.

1.3 This HRA forms part of the supporting documents alongside the Strategic Ecological Assessment (SEA), conducted by LUC[1], to support the development of the Plan.

1.4 The purpose of this report is as follows:

- To identify which Habitats Sites, have the potential to be affected by the Plan, including establishing the key information such as threats to vulnerabilities, current pressures and any species and habitat interdependencies; and
- To carry out HRA Screening and subsequent Appropriate Assessment, if required, of the Management Plan. If Appropriate Assessment is required, the HRA will make recommendations to avoid adverse effects on integrity of Habitats Sites.

Context for the National Landscape Management Plan

1.5 The Norfolk Coast National Landscape (NCNL), formerly known as 'Area of Outstanding Natural Beauty (AONB)', has three component parts: in the west, it stretches from The Wash to Sandringham Estate, along the North Norfolk Coast; it runs from Holme-next-the-Sea to Paston; and in the east, from Sea Palling to Winterton-On-Sea (as shown in **Figure 1.1**). In total, the NCNL covers 453 km^2 of land area and has 90.8 km of coastline.

1.6 Habitats in the NCNL range from coastal and intertidal habitats that support iconic coastal birds such as the marsh

[1] LUC (2025) SEA Scoping Report.

harrier, to inland farmland, which provides important habitat for threatened birds such as the corn bunting. Many national and international nature designations are situated within, or partially within, the NCNL, including five Special Protection Areas (SPA), eight Special Areas of Conservation (SAC), four Ramsar sites and 28 Sites of Special Scientific Interest (SSSIs). The North Norfolk Coast SPA and Ramsar, and The Wash and North Norfolk Coast SAC cover much of the coast in the west of the NCNL. The priority features of the SPA, SAC and Ramsar include coastal lagoon habitat, the most notable located at Blakeney Spit Pools, which is known to support the lagoonal mysid shrimp (*Paramysis nouveli*), a nationally rare species.

1.7 Additionally, the North Norfolk Heritage Coast was defined in 1975 by Local Authorities; a non-statutory designation recognising the large stretch of undeveloped coastline between Holme-next-the-Sea and Weybourne.

1.8 Much of the undeveloped coast has a wilderness quality that is rare in lowland England. The NCNL is known for the quality of its night skies and lack of light pollution, and the inland parts of the NCNL are also known for relative remoteness and tranquillity.

1.9 The NCNL has a strong rural character with agriculture, in particular arable farmland, comprising by far the largest land use. The NCNL has a dispersed pattern of rural settlements with historic fishing and farming communities; however, fishing and agriculture still play a key role in the area's character.

1.10 The National Parks and Access to the Countryside Act of 1949 established the legal framework for England and Wales's 46 National Landscapes (formerly 'Areas of Outstanding Natural Beauty') as well as other Protected Landscapes. These include the National Landscapes, National Parks and National Trails, with the aim of protecting some of the UK's most important habitats, species, history and geology.

1.11 The NCNL sits within the wider Norfolk Coast Protected Landscape (NCPL), which also includes:

- The Wash and North Norfolk Marine Protected Area Network, managed by The Wash and North Norfolk Marine Partnership.
- The Peddars Way and Norfolk Coast Path National Trail, managed by the Norfolk National Trail Partnership.

1.12 The NCNL has a set of seven special qualities that make the area unique and worthy of designation. The special qualities are:

1. Dynamic character and geomorphology of the coast.
2. Strong and distinctive links between land and sea.
3. Diversity of landscapes and settlement types.
4. Biodiversity and locally distinctive habitats.
5. Nationally and internationally important geology.
6. Dark skies and wild areas.
7. Heritage (past and current).

1.13 The primary purpose of the NCNL is to conserve and enhance the natural beauty and special character of the area. There are also two secondary purposes: to take account of the needs of agriculture, forestry, fishing and other local rural industries, and of the economic and social needs of local communities; and to seek to meet the demand for recreation.

Norfolk Coast National Landscape Management Plan

1.14 The NCNL is managed by the NCP, and the work of the NCP is guided by the Plan. The NCP is composed of a broad range of organisations with a shared interest in the Norfolk Coast. As the Plan states:

> "*this collaborative model recognises that no single organisation can deliver the aims of the Management Plan in isolation. Instead, the Partnership provides a framework for coordination, bringing together expertise, aligning priorities, coordinating action and maximising resources for the long-term benefit of the landscape*".

1.15 The current Norfolk Coast AONB Management Plan was adopted in 2019 and then revised in 2022. The current Management Plan sets out a vision and associated objectives and policies for the management of NCNL. The NCP is required by Part IV of the Countryside & Rights of Way (CRoW) Act 2000 to prepare and review AONB Management Plans at intervals of not more than five years.

1.16 As noted above, the NCP has consulted upon a new Draft Management Plan, which will cover the period 2025-2030.

1.17 The Plan sets out the vision, priorities, and strategic direction for protecting and enhancing the NCNL. It does not identify detailed actions or specific projects, but establishes a framework through which priorities can be developed and delivered in partnership with other organisations.

1.18 The Plan's vision is "thriving nature and vibrant communities existing in harmony".

1.19 The Plan is comprised of four priority areas:

1. Nature recovery
2. Climate adaptation and mitigation

3. Sustainable development, including planning, tourism, dark skies and heritage
4. Local communities, including businesses

1.20 Each priority area contains several goals and targets, which supports the special qualities of the NCNL. These goals and targets are summarised in **Appendix C**.

1.21 The specific delivery mechanisms for the Management Plan, including measurable actions, lead partners and implementation detail, will be set out in supporting Action Plans. These Action Plans are due to be developed following publication of this management plan and therefore, have not been subject to consideration within this report.

Local Planning Authorities

1.22 Responsibility of the NCNL is shared by the following Local Planning Authorities (LPAs), Borough Council of King's Lynn and West Norfolk Borough Council, North Norfolk District Council, Great Yarmouth Borough Council and Norfolk County Council.

1.23 Norfolk County Council sits above the three Local Authorities and provides overarching advice and guidance to the Local Authorities as well as NCP.

1.24 The relevant Local Plans and policies which are specific to the NCNL and its management, are provided within the SEA Scoping Report (LUC, 2025).

The Requirement to Undertake a Habitats Regulations Assessment

1.25 The requirement to undertake a HRA of plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in 2007[2]; the currently applicable version is the Habitats Regulations 2017, as amended[3].

1.26 When preparing the new Management Plan, the NCP is therefore required by law to carry out an HRA. The NCP can commission consultants to undertake HRA work on its behalf and this (the work documented in this HRA report) is then reported to and considered by the NCP as the 'competent authority'. The NCP will consider this work and would usually only progress a plan if it considers that the plan will not adversely affect the integrity[4] of any 'Habitats Site', as defined below (the exception to this would be where 'imperative reasons of overriding public interest' can be demonstrated). The requirement for authorities to comply with the Habitats Regulations when preparing a Plan is also noted in the Government's online Planning Practice Guidance[5] (PPG).

1.27 HRA refers to the assessment of the potential effects of a plan on one or more sites afforded the highest level of protection in the UK: SPAs and SACs. These were classified under European Union (EU) legislation but since 1 January 2021 are protected in the UK by the Habitats Regulations 2017 (as amended). Although the EU Directives from which the UK's Habitats Regulations originally derived are no longer binding, the Regulations still make reference to the lists of habitats and species that the sites were designated for, which are listed in annexes to the EU Directives:

- SACs are designated for particular habitat types (specified in Annex 1 of the EU Habitats Directive[6]) and species (Annex II). The listed habitat types and species (excluding birds) are those considered to be most in need of conservation at a European level. Before EU exit day, designation of SACs also had regard to the coherence of the 'Natura 2000' network of Habitats Sites. After EU exit day, regard is had to the importance of such sites for the coherence of the UK's 'national site network'.
- SPAs are classified for rare and vulnerable birds (Annex I of the EU Birds Directive[7]), and for regularly occurring migratory species not listed in Annex I.

1.28 The term 'European sites' was previously commonly used in HRA to refer to 'Natura 2000' sites[8] and Ramsar sites (internationally designated under the Ramsar Convention). However, a Government Policy Paper[9] on changes to the Habitats Regulations 2017 post-EU exit states that:

- Any references to Natura 2000 in the 2017 Regulations and in guidance now refer to the new 'national site network'.

[2] The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 (2007) SI No. 2007/1843. TSO (The Stationery Office), London.
[3] The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579).
[4] The integrity of a site is the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was designated. (Source: UK Government Planning Practice Guidance, available at: https://www.gov.uk/guidance/appropriate-assessment)
[5] https://www.gov.uk/guidance/appropriate-assessment
[6] Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive')
[7] Directive 2009/147/EC of 30 November 2009 on the conservation of wild birds (the 'Birds Directive')
[8] The network of protected areas identified by the EU: https://ec.europa.eu/environment/nature/natura2000/index_en.htm
[9] https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017

- The national site network includes existing SACs and SPAs; and new SACs and SPAs designated under these Regulations.
- Designated Wetlands of International Importance (known as Ramsar sites) do not form part of the national site network. Many Ramsar sites overlap with SACs and SPAs and may be designated for the same or different species and habitats.

1.29 Although Ramsar sites do not form part of the new national site network, the NPPF[10] and practice guidance[11] states that Ramsar sites should be treated within the planning system in the same way as SACs and SPAs.

1.30 Furthermore, sites which have been formally proposed as SPAs and SACs, but which are not yet subject to legal protection under the Habitats Regulations, should be treated within the planning system in the same way as if they were legally designated. The same considerations should, as a matter of policy, be applied to proposed Ramsar sites.

"Any proposals affecting the following sites [in addition to SACs and SPAs] would also require a HRA because these are protected by government policy:

- Proposed SACs
- Potential SPAs
- Ramsar sites - wetlands of international importance (both listed and proposed)
- Areas secured as sites compensating for damage to a Habitats site."

1.31 The legislative requirement for HRA does not apply to other nationally designated wildlife sites such as Sites of Special Scientific Interest or National Nature Reserves.

1.32 For simplicity, this report uses the term 'Habitats Site' to refer to all types of designated site for which Government guidance[12] requires an HRA.

1.33 The overall purpose of an HRA is to conclude whether or not a proposal or policy, or a whole plan, would adversely affect the integrity of the Habitats Site in question. This is judged in terms of the implications of the plan for a site's 'qualifying features' (i.e. those Annex I habitats, Annex II species, and Annex I bird populations for which it has been designated). Significantly, HRA is based on the precautionary principle. Where uncertainty or doubt remains, an adverse effect should be assumed.

Structure of this report

1.34 This chapter has introduced the requirement to undertake an HRA of the new Management Plan for the NCP and provided some background to the content of the Management Plan. The remainder of the report is structured as follows:

- **Chapter 2** describes the approach being undertaken to the HRA for the Plan. It also describes case law changes, summarises the key issues that will need to be considered during the HRA process and describes the identification of Habitats Sites in and around[13] the Norfolk Coast National Landscape that could be affected by the Plan.
- **Chapter 3** describes the Habitats Sites in and around the Norfolk Coast National Landscape and their key vulnerabilities.
- **Chapter 4** sets out the Screening assessment. It describes the assumptions which underpin the HRA and explores each impact pathway in turn.
- **Chapter 5** describes the conclusions and recommendations of the HRA.

1.35 The information in the main body of the report is supported by the following appendices:

- **Appendix A** presents a series of maps showing the location and extent of the National Landscape (**Figure 1.1**) and the Habitats Sites in and around the National Landscape (**Figure 3.1**).
- **Appendix B** sets out detailed information on qualifying features of each of the Habitats Sites that are the focus of the HRA.
- **Appendix C** sets out the Screening assessment of the goals and targets within the Management Plan.

[10] NPPF para 187, available from https://www.gov.uk/government/publications/national-planning-policy-framework--2
[11] Available at: https://www.gov.uk/guidance/construction-near-protected-areas-and-wildlife
[12] The HRA Handbook, Section A3. David Tyldesley & Associates, a subscription based online guidance document: https://www.dtapublications.co.uk/handbook/European
[13] As detailed in Chapter 2, a 20km buffer area around the Norfolk Coast National Landscape has been applied as a starting point for this HRA.

Chapter 2
Approach to HRA

2.1 The HRA should be undertaken by the 'competent authority', in this case the NCP. LUC has been commissioned by the NCP to carry out HRA work on its behalf, although this is to be reported to and considered by the NCP as the competent authority during the development of the Plan, before adopting the Plan. The HRA also typically requires close working with Natural England as the statutory nature conservation body[14] to obtain the necessary information, agree the process, outcomes and mitigation proposals. Where a plan or project requires Appropriate Assessment, consultation with Natural England is a statutory requirement.

Stages of HRA

2.2 The HRA of plans is undertaken in stages (as described below) and should conclude whether or not a proposal would adversely affect the integrity of the Habitats site in question.

2.3 HRAs are carried out at all levels of plan making, including higher tier plans such as national plans to lower tier local plans and at a project level. The process for carrying out an HRA is the same for any plan or project. However, HRAs carried out for local level plans and projects will be more specific to a certain area or development proposal covering a smaller area than an HRA of a national plan. In turn, project-level HRAs will be able to be more specific.

2.4 The HRA process should inform the preparation of a plan by seeking to avoid adverse effects on the integrity of Habitats Sites. Therefore, the outcome of an HRA will help to inform whether a plan should be adopted. If it is determined that adverse effects are unavoidable, recommendations are made through the HRA to ensure that mitigation is included in the goals within the Plan to ensure the delivery of appropriate mitigation. This will reduce the likelihood or severity of any adverse impact on Habitats Sites. Mitigation could include the requirement for project-level/site-specific HRAs for specific proposals within a plan.

Requirements of the Habitats Regulations

2.5 In assessing the effects of a plan in accordance with Regulation 105 of the Conservation of Habitats and Species

[14] Regulation 5 of the Habitats Regulations 2017.

Regulations 2017 (as amended) (the 'Habitats Regulations'), there are potentially two tests to be applied by the competent authority: a 'Significance Test', followed, if necessary, by an Appropriate Assessment which would inform the 'Integrity Test'. The relevant sequence of questions is as follows:

- Step 1: Under Reg. 105(1)(b), consider whether the plan is directly connected with or necessary to the management of the sites. If not, proceed to Step 2.
- Step 2: Under Reg. 105(1)(a) consider whether the plan is likely to have a significant effect on a Habitats site, either alone or in combination with other plans or projects (the 'Significance Test'). If yes, proceed to Step 3.

2.6 [Steps 1 and 2 are undertaken as part of Stage 1: HRA Screening, shown in **Table 2.1** below]

- Step 3: Under Reg. 105(1), make an Appropriate Assessment of the implications for the Habitats site in view of its current conservation objectives (the 'Integrity Test'). In so doing, it is mandatory under Reg. 105(2) to consult Natural England, and optional under Reg. 105(3) to take the opinion of the general public.

2.7 [This step is undertaken during Stage 2: Appropriate Assessment, shown in **Table 2.1**]

- Step 4: In accordance with Reg. 105(4), but subject to Reg. 107, give effect to the plan only after having ascertained that the plan would not adversely affect the integrity of a Habitats site.

2.8 [This step follows Stage 2 where a finding of 'no adverse effect' is concluded. If it cannot be, it proceeds to Step 5 as part of Stage 3 of the HRA process]

- Step 5: Under Reg. 107, if Step 4 is unable to rule out adverse effects on the integrity of a Habitats site and no alternative solutions exist then the competent authority may nevertheless agree to the plan or project if it must be carried out for 'imperative reasons of overriding public interest' (IROPI).

2.9 [This step is undertaken during Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation shown in **Table 2.1**]

Typical stages

2.10 **Table 2.1** summarises the stages and associated tasks and outcomes typically involved in carrying out a full HRA of a plan, based on various guidance documents[15,16,17].

Table 2.1 Stages of HRA

Stage	Task	Outcome
Stage 1: HRA Screening	Description of the plan and confirmation that it is not directly connected with or necessary to the management of Habitats Sites. Identification of potentially affected Habitats Sites and their conservation objectives[18]. Assessment of likely significant effects of the plan alone or in combination with other plans and projects, prior to consideration of avoidance or reduction ('mitigation') measures[19].	Where effects are unlikely, prepare a 'finding of no significant effect report'. Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.

[15] Available online at - Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2019) Appropriate assessment: Guidance on the use of Habitats Regulations Assessment: https://www.gov.uk/guidance/appropriate-assessment

[16] European Commission (2001) Assessment of plans and projects significantly affecting Habitats Sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC.

[17] The HRA Handbook. David Tyldesley & Associates, a subscription based online guidance document: https://www.dtapublications.co.uk/handbook/European

[18] Conservation objectives are published by Natural England for SACs and SPAs.

[19] In line with the CJEU judgment in Case C-323/17 People Over Wind v Coillte Teoranta, mitigation must only be taken into consideration at this stage and not during Stage 1: HRA Screening.

Stage	Task	Outcome
Stage 2: Appropriate Assessment (where Stage 1 does not rule out likely significant effects)	Information gathering (plan and Habitats Sites[20]). Impact prediction. Evaluation of plan impacts in view of conservation objectives of Habitats Sites. Where impacts are considered to directly or indirectly affect qualifying features of Habitats Sites, identify how these effects will be avoided or reduced ('mitigation').	Appropriate Assessment report describing the plan, Habitats site baseline conditions, the adverse effects of the plan on the Habitats site, how these effects will be avoided or reduced, including the mechanisms and timescale for these mitigation measures. If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.
Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation	Identify 'imperative reasons of overriding public interest' (IROPI). Demonstrate no alternatives exist. Identify potential compensatory measures.	This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous.

2.11 It is normally anticipated that emphasis on Stages 1 and 2 of this process will, through a series of iterations, help ensure that potential adverse effects are identified and eliminated through the inclusion of mitigation measures designed to avoid or reduce effects. The need to consider alternatives could imply more onerous changes to a plan document. It is generally understood that so called 'imperative reasons of overriding public interest' (IROPI) are likely to be justified only very occasionally and would involve engagement with the Government.

Case Law

2.12 This HRA has been prepared in accordance with relevant case law findings, including most notably the 'People over Wind' and 'Holohan' rulings from the Court of Justice for the European Union (CJEU).

2.13 The *People over Wind, Peter Sweetman v Coillte Teoranta* (April 2018) judgment ruled that Article 6(3) of the Habitats Directive should be interpreted as meaning that mitigation measures should be assessed as part of an Appropriate Assessment and should not be taken into account at the Screening stage. The precise wording of the ruling is as follows:

> "Article 6(3) ……must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the Screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site."

2.14 In light of the above, the HRA screening stage will not rely upon avoidance or mitigation measures to draw conclusions as to whether the Plan could result in likely significant effects on Habitats Sites, with any such measures being considered at the Appropriate Assessment stage as relevant.

2.15 This HRA will also fully consider the *Holohan v An Bord Pleanala* (November 2018) judgement which stated that:

> "Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that an 'appropriate assessment' must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for

[20] In addition to Habitats site citations and conservation objectives, key information sources for understanding factors contributing to the integrity of Habitats Sites include (where available): conservation objectives, supplementary advice and Site Improvement Plans provided by Natural England.

> the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site."

2.16 In undertaking the HRA, LUC will consider the potential for effects on species and habitats, including those not listed as qualifying features, to result in secondary effects upon the qualifying features of Habitats Sites, including the potential for complex interactions and dependencies. In addition, the potential for offsite impacts, such as through impacts to functionally linked land, and/or species and habitats located beyond the boundaries of the Habitats site, but which may be important in supporting the ecological processes of the qualifying features, will also be fully considered in this HRA.

2.17 Similarly, effects on both qualifying and supporting habitats and species on functionally linked land (FLL) or habitat will be considered in the HRA, in line with the High Court judgment in RSPB and others v Secretary of State and London Ashford Airport Ltd [2014 EWHC 1523 Admin] (paragraph 27), which stated that:

> "There is no authority on the significance of the non-statutory status of the FLL. However, the fact that the FLL was not within a protected site does not mean that the effect which a deterioration in its quality or function could have on a protected site is to be ignored. The indirect effect was still protected. Although the question of its legal status was mooted, I am satisfied …. That while no particular legal status attaches to FLL, the fact that land is functionally linked to protected land means that the indirectly adverse effects on a protected site, produced by effects on FLL, are scrutinised in the same legal framework just as are the direct effects of acts carried out on the protected site itself. That is the only sensible and purposive approach where a species or effect is not confined by a line on a map or boundary fence. This is particularly important where the boundaries of designated sites are drawn tightly as may be the UK practice".

2.18 In addition to this, the HRA will take into consideration the 'Wealden' judgement and the 'Dutch Nitrogen Case' judgements from the CJEU.

2.19 *Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority* (2017) ruled that it was not appropriate to scope out the need for a detailed assessment for an individual plan or project based on the annual average daily traffic (AADT) figures detailed in the Design Manual for Roads and Bridges or the critical loads used by Defra or Environmental Agency without considering the in-combination impacts with other plans and projects.

2.20 In light of this judgement, the HRA will therefore consider traffic growth based on the effects from the Plan in combination with other drivers of growth such as development proposed in neighbouring districts and demographic change.

2.21 The 2018 *'Coöperatie Mobilisation for the Environment and Vereniging Leefmilieu (Dutch Nitrogen)'* judgement stated that:

> "...the positive effects of the autonomous decrease in the nitrogen deposition…be taken into account in the appropriate assessment…, it is important that the autonomous decrease in the nitrogen deposition be monitored and, if it transpires that the decrease is less favourable than had been assumed in the appropriate assessment, that adjustments, if required, be made."

2.22 The Dutch Nitrogen judgement also states that according to previous case law:

> "…it is only when it is sufficiently certain that a measure will make an effective contribution to avoiding harm to the integrity of the site concerned, by guaranteeing beyond all reasonable doubt that the plan or project at issue will not adversely affect the integrity of that site, that such a measure may be taken into consideration in the 'appropriate assessment' within the meaning of Article 6(3) of the Habitats Directive."

2.23 The HRA will also take into account the *Grace and Sweetman* (July 2018) judgement from the CJEU which stated that:

> ""there is a distinction to be drawn between protective measures forming part of a project and intended to avoid or reduce any direct adverse effects that may be caused by the project in order to ensure that the project does not adversely affect the integrity of the area, which are covered by Article 6(3), and measures which, in accordance with Article 6(4), are aimed at compensating for the negative effects of the project on a protected area and cannot be taken into account in the assessment of the implications of the project."
>
> "As a general rule, any positive effects of the future creation of a new habitat, which is aimed at compensating for the loss of area and quality of that habitat type in a protected area, are highly difficult to forecast with any degree of certainty or will be visible only in the future."
>
> "A mitigation strategy may only be taken into account at AA (a.6(3)) where the competent authority is "sufficiently

certain that a measure will make an effective contribution to avoiding harm, guaranteeing beyond all reasonable doubt that the project will not adversely affect the integrity of the area."

"Otherwise, it falls to be considered to be a compensatory measure to be considered under a.6(4) only where there are imperative reasons of overriding public interest."

2.24 The Appropriate Assessment of the Plan will therefore only consider the existence of measures to avoid or reduce its direct adverse effects (mitigation) if the expected benefits of those measures are beyond reasonable doubt at the time of the assessment.

Screening Methodology

2.25 The HRA Screening of this Plan is undertaken in line with current available guidance and seeks to meet the requirements of the Habitats Regulations:

2.26 The purpose of the Screening stage is to:

- Identify all aspects of the Plan which would have no effect on a Habitats site, so that that they can be eliminated from further consideration in respect of this and other plans.
- Identify all aspects of the Plan which would not be likely to have a significant effect on a Habitats site (i.e. would have some effect, because of links/connectivity, but which are not significant), either alone or in combination with other aspects of the same plan or other plans or projects, which therefore do not require 'Appropriate Assessment'.
- Identify those aspects of the Plan where it is not possible to rule out the risk of significant effects on a Habitats site, either alone or in combination with other plans or projects. This provides a clear scope for the parts of the Plan that will require Appropriate Assessment.

Identification of Habitats Sites which may be affected by the new National Landscape Management Plan

2.27 To initiate the search of Habitats Sites that could potentially be affected by the Plan, it is established practice in HRAs to consider Habitats Sites within the boundary covered by a plan, in this case the National Landscape boundary, and also within a buffer distance from the boundary of the plan area.

2.28 A distance of 15km is typically used when considering Plan related HRA impacts upon Habitats Sites. However, a larger distance of 20km was used from Norfolk Coast National Landscape as a starting point to identify Habitats Sites that could be affected by impacts relating to the Plan. This distance has been applied for a number of HRAs of plans within the Norfolk region, which have been subject to consultation with Natural England. This larger distance is applied with consideration for qualifying bird species with larger dispersal distances (namely pink footed geese, *Anser brachyrhynchus*), which are associated with The Wash SPA and Ramsar site. This is considered an appropriate and proportionate mechanism for initiating a search for Habitats Sites that may be impacted by an emerging plan.

Assessment of 'likely significant effect'

2.29 As required under Regulation 105 of The Conservation of Habitats and Species Regulations 2017 (as amended), an assessment will be undertaken of the 'likely significant effects' of the goals set out within the Plan. The assessment will be undertaken to identify which goals would be likely to have a significant effect on Habitats Sites in the Norfolk Coast National Landscape (+20km). This assessment will need to be repeated with each iteration of the management plan. The Screening assessment has been conducted without taking mitigation into account in accordance with the 'People over Wind' judgment.

2.30 Consideration has been given to the potential for the goals proposed as part of the Plan to result in significant effects associated with:

- Physical loss or damage to habitat.
- Non-physical disturbance (noise, vibration and light pollution).
- Non-toxic contamination.
- Air pollution.
- Recreational pressure.
- Changes to hydrology, including water quantity and quality.

2.31 This thematic/impact category approach allows for consideration to be given to the cumulative effects of the Plan rather than focusing exclusively on individual goals provided by the Plan.

2.32 A risk-based approach involving the application of the precautionary principle has be adopted in the assessment, such that a conclusion of 'no significant effect' will only be reached where it is considered very unlikely, based on current knowledge and the information available, that a proposal in the Plan in question would have a significant effect on the integrity of a Habitats site.

2.33 For some types of impacts, the potential for likely significant effects can be determined on a proximity basis. This Screening Report identifies the Habitats Sites that could

potentially be affected by the Plan and considers the types of impacts that could be relevant to the Plan's possible impact pathways to Habitats Sites. This is detailed in **Chapter 4**.

Interpretation of 'likely significant effect'

2.34 Relevant case law helps to interpret when effects should be considered as being likely to result in a significant effect, when carrying out a HRA of a plan.

2.35 In the Waddenzee case[21], the European Court of Justice ruled on the interpretation of Article 6(3) of the Habitats Directive (translated into Reg. 102 in the Habitats Regulations), including that:

- An effect should be considered 'likely', "if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site" (para 44).
- An effect should be considered 'significant', "if it undermines the conservation objectives" (para 48).
- Where a plan or project has an effect on a site "but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned" (para 47).

2.36 A relevant opinion delivered to the Court of Justice of the European Union[22] commented that:

> "The requirement that an effect in question be 'significant' exists in order to lay down a de minimis threshold. Plans or projects that have no appreciable effect on the site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill."

2.37 This opinion (the 'Sweetman' case) therefore allows for the authorisation of plans and projects whose possible effects, alone or in combination, can be considered 'trivial' or 'de minimis'; referring to such cases as those "which have no appreciable effect on the site". In practice such effects could be screened out as having no likely significant effect; they would be 'insignificant'.

2.38 The HRA Screening assessment will therefore consider whether the Plan could have likely significant effects either alone or in combination.

Mitigation provided by the new National Landscape Management Plan

2.39 Some of the potential effects of the Plan (if any) could be mitigated through the implementation of other goals in the Plan itself. For example, goals to encourage sustainable tourism could help mitigate increased pressure from recreation activities at Habitats Sites. Nevertheless, in accordance with the 'People over Wind' judgment, avoidance and mitigation measures cannot be relied upon at the Screening stage, and therefore, where such measures exist, they will be considered at the Appropriate Assessment stage for impacts and goals where likely significant effects, either alone or in-combination, could not be ruled out.

Assessment of potential in-combination effects

2.40 Regulation 105 of the Habitats Regulations 2017 requires an Appropriate Assessment where "a land use plan is likely to have a significant effect on a Habitats site (either alone or in combination with other plans or projects) and is not directly connected with or necessary to the management of the site". Therefore, it will be necessary to consider whether any impacts identified from the Plan may combine with other plans or projects to give rise to significant effects in-combination.

2.41 Where the Plan is likely to have an effect on its own e.g. due to recreation pressures (due to impact pathways being present), but it is not likely to be significant, the in-combination assessment at Screening stage will need to determine whether there may also be the same types of effect from other plans or projects that could combine with the Plan to produce a significant effect. If so, this likely significant effect (e.g., recreation pressures) arising in combination with other plans or projects, would then need to be considered through the Appropriate Assessment stage (for example to determine if recreation pressures would have an adverse effect on the integrity of the relevant Habitats site). Where the Screening assessment has concluded that there is no impact pathway between goals that may be proposed in the Plan and the conditions necessary to maintain qualifying features of a Habitats site, then there will be no in-combination effects to assess at the Screening or Appropriate Assessment stage. This approach accords with guidance on HRA[23].

[21] European Court of Justice in Case C-127/02 Landelijke Vereniging tot Behoud van de Waddenzee
[22] Advocate General's Opinion to CJEU in Case C-258/11 Sweetman and others v An Bord Pleanala 22nd Nov 2012.
[23] Available online at - The HRA Handbook. David Tyldesley & Associates, a subscription based online guidance document: https://www.dtapublications.co.uk/handbook/European

2.42 If required, the potential for in-combination impacts will focus on plans prepared by local authorities that overlap with Habitats Sites that are within the scope of the HRA. The findings of any associated HRA work for those plans will be reviewed where available. Where relevant, any strategic projects in the area that could have in-combination effects with the plans will also be identified and reviewed. This will include a review of Nationally Significant Infrastructure Projects as detailed on the National Infrastructure Planning website.

2.43 The online HRA Handbook suggests the following plans and projects may be relevant to consider as part of the in-combination assessment:

- Applications lodged but not yet determined, including refusals subject to an outstanding appeal or legal challenge.
- Projects subject to periodic review e.g. annual licences, during the time that their renewal is under consideration.
- Projects authorised but not yet started.
- Projects started but not yet completed.
- Known projects that do not require external authorisation.
- Proposals in adopted plans.
- Proposals in draft plans formally published or submitted for final consultation, examination or adoption.

2.44 The need for in-combination assessment also arises at the Appropriate Assessment stage, as discussed in the section below.

Appropriate Assessment Methodology

2.45 Following the Screening stage, if likely significant effects on Habitats Sites are unable to be ruled out, the plan-making authority is required under Regulation 105 of the Habitats Regulations 2017 to make an 'Appropriate Assessment' of the implications of the Plan for Habitats Sites, in view of their conservation objectives. European Commission Guidance[15] states that the Appropriate Assessment should consider the impacts of the Plan (either alone or in combination with other projects or plans) on the integrity of Habitats Sites with respect to their conservation objectives and to their structure and function.

Assessing the effects on site integrity

2.46 A site's integrity depends on it being able to sustain its 'qualifying features' (i.e. those Annex 1 habitats, Annex II species, and Annex 1 bird populations for which it has been designated) and to ensure their continued viability. The Holohan judgement also clarifies that effects on species and habitats not listed as qualifying features, but which could result in secondary effects upon the qualifying features of Habitats Sites also need to be considered.

2.47 A high degree of integrity is considered to exist where the potential to meet a site's conservation objectives is realised and where the site is capable of self-repair and renewal with a minimum of external management support.

2.48 A conclusion needs to be reached as to whether or not the Plan would adversely affect the integrity of a Habitats site. As stated in the European Commission Guidance[15], assessing the effects on the site(s) integrity involves considering whether the predicted impacts of the Plan goals (either alone or in combination) have the potential to:

- Cause delays to the achievement of conservation objectives for the site.
- Interrupt progress towards the achievement of conservation objectives for the site.
- Disrupt those factors that help to maintain the favourable conditions of the site.
- Interfere with the balance, distribution and density of key species that are the indicators of the favourable condition of the site.
- Cause changes to the vital defining aspects (e.g. nutrient balance) that determine how the site functions as a habitat or ecosystem.
- Change the dynamics of relationships that define the structure or function of the site (e.g. relationships between soil and water, or animals and plants).
- Interfere with anticipated natural changes to the site.
- Reduce the extent of key habitats or the population of key species.
- Reduce the diversity of the site.
- Result in disturbance that could affect the population, density or balance between key species.
- Result in fragmentation.
- Result in the loss of key features.

2.50 The conservation objectives for each Habitats site are generally to maintain the qualifying features in favourable condition. The Standard Data Forms, Information Sheet on Ramsar Wetlands (RIS) and other site information drawn from Conservation Objectives, Supplementary Advice and Site Improvement Plans, where available and for each Habitats site provide a high-level overview of the issues (both current and predicted) affecting the condition of the European features on the site(s) and outline the priority measures required to improve the condition of the features. These will be drawn on

to help to understand what is needed to maintain the integrity of the Habitats Sites.

2.51 For each Habitats site where an uncertain or likely significant effect is identified in relation to the Plan, the potential impacts will be set out and judgements made (based on the information available) regarding whether the impact will have an adverse effect on the integrity of the site, alone or in-combination with other plans and projects. Consideration will be given to the potential for mitigation measures to be implemented that could reduce the likelihood or severity of the potential impacts such that there would not be an adverse effect on the integrity of the Habitats site.

Chapter 3
Habitats Sites

3.1 Geographical Information Systems (GIS) data has been used to map the locations and boundaries of Habitats Sites in and within 20km of the Norfolk Coast National Landscape boundary (**Figure 3.1, Appendix A**), using publicly available data from Natural England. All Habitats Sites lying partially or wholly within 20km have been included. A distance of 20km is generally considered appropriate for identifying potential impact pathways. Habitats Sites located beyond 20km can be included if they share functional ecological connectivity to the Plan area, for example via river systems.

3.2 Habitats Sites scoped in which are within the Norfolk Coast National Landscape, within 20km, or which share functional ecological connectivity to the Plan area are listed in **Table 3.1** below. Detailed information about each site is provided in **Appendix B**.

Table 3.1 Habitats Sites within the Norfolk Coast National Landscape and within 20km of the district

Habitats site	Closest Distance / Direction from the Norfolk Coast National Landscape
Special Areas of Conservation (SACs)	
Norfolk Valley Fens	Within the Norfolk Coast National Landscape
North Norfolk Coast	Within the Norfolk Coast National Landscape
Overstrand Cliffs	Within the Norfolk Coast National Landscape
Paston Great Barn	Within the Norfolk Coast National Landscape
Roydon Common & Dersingham Bog	Within the Norfolk Coast National Landscape
Southern North Sea	Within the Norfolk Coast National Landscape
The Broads	Within the Norfolk Coast National Landscape
The Wash & North Norfolk Coast	Within the Norfolk Coast National Landscape
Winterton-Horsey Dunes	Within the Norfolk Coast National Landscape
Haisborough, Hammond and Winterton	6.70km east
River Wensum	9.00km south
Inner Dowsing, Race Bank and North Ridge	10.83km north

Habitats site	Closest Distance / Direction from the Norfolk Coast National Landscape
Saltfleetby-Theddlethorpe Dunes & Gibraltar Point	18.32km northwest
Special Protection Areas (SPAs)	
Broadland	Within the Norfolk Coast National Landscape
Great Yarmouth North Denes	Within the Norfolk Coast National Landscape
Greater Wash	Within the Norfolk Coast National Landscape
North Norfolk Coast	Within the Norfolk Coast National Landscape
The Wash	Within the Norfolk Coast National Landscape
Outer Thames Estuary	7.36km southeast
Breydon Water	10.77km southeast
Breckland	16.41km south
Gibraltar Point	17.63km northwest
Ramsar Sites	
Broadland	Within the Norfolk Coast National Landscape
Dersingham Bog	Within the Norfolk Coast National Landscape
North Norfolk Coast	Within the Norfolk Coast National Landscape
The Wash	Within the Norfolk Coast National Landscape
Roydon Common	0.71km south
Breydon Water	10.77km south
Gibraltar Point	17.63km northwest

3.3 The qualifying features of these Habitats Sites have been described within **Appendix B**. In doing so, reference was made to the standard data forms published on the Joint Nature Conservation Committee (JNCC) website[24], and if relevant Information Sheets on Ramsar Wetlands. This analysis enables Habitats site qualifying features to be identified. This information will allow an analysis of how the potential impacts of the Plan may affect the integrity of each site.

3.4 The threats and pressures to these Habitats Sites were also reviewed. In doing so, reference was made to Site Improvement Plans and Conservation Objectives published by Natural England and if relevant Information Sheets on Ramsar Wetlands. This information will allow an analysis of the potential impacts (either positive or negative) of the Plan. For example, the goals within the management plan may help to reduce existing pressures and contribute to the conservation objectives of each Habitats site. Common threats and pressures to the Habitats Sites included public access and disturbance, air and water pollution, unsuitable water levels to maintain habitat integrity, hydrological changes, invasive species, inappropriate management, and changes in species distributions. Additional threats and pressures to the Habitats Sites which are relevant to the management plan included planning permission, lack of site monitoring, habitat

[24] Available at: https://jncc.gov.uk/our-work/ramsar-sites/

fragmentation, climate change, fisheries, and water abstraction.

Chapter 4
Screening Assessment

4.1 For many of the broad impacts that could arise from the Plan, the potential for significant effects will be determined by location, using GIS data to determine the proximity of potential impacts resulting from the management plan to the Habitats Sites that are the subject of the assessment.

4.2 However, there are many uncertainties associated with using set distances as there are very few standards available as a guide to how far impacts will travel. Therefore, a number of assumptions will be applied in relation to assessing the potential effects on Habitats Sites that may result from the Plan, as described below.

4.3 Other types of potential effect may be identified during the HRA process. If so, any assumptions that the assessment of those effects is based on will also be set out.

Screening of Goals and Targets in the Plan

4.4 The goals and targets set out within the Plan were subject to screening for likely significant effects (LSE) (**Appendix C**).

4.5 The Plan sets out the vision, priorities, and strategic direction for protecting and enhancing the NCNL. It does not identify detailed actions or specific projects but establishes a framework through which priorities can be developed and delivered in partnership with other organisations, through the future development and implementation of Action Plans.

4.6 The NCNL is managed by the NCP, a broad range of organisations with a shared interest in the Norfolk Coast. This collaborative model recognises that no single organisation can deliver the aims of the Management Plan in isolation. Instead, the NCP provides a framework for coordination, bringing together expertise, aligning priorities, coordinating action and maximising resources for the long-term benefit of the landscape.

4.7 Therefore, the goals within the Plan aim to protect and conserve nature and the landscape and include targets to restore, create, and manage habitats and protected sites, encourage sustainability and nature-based solutions, and engage with local communities and stakeholders, and do not result in direct action. The specific delivery mechanisms for the Management Plan, including measurable actions, lead

partners and implementation detail, will be set out in supporting Action Plans.

4.8 Therefore, due to the nature of these goals and targets, which aim to inform and support partners such as public bodies, local planning authorities (LPAs), and environmental non-governmental organisations (eNGOs) in delivering their objectives, no LSE were identified from any of the goals and targets set out within the Plan.

Screening of Impacts

Physical Damage and Loss of Habitat - onsite

4.9 Any development supported by the Plan would take place within the Norfolk Coast National Landscape boundary. Therefore, only Habitats Sites within the Norfolk Coast National Landscape could be affected through physical damage or loss of habitat from within the Habitats Sites boundaries as a result of the Plan.

4.10 The Plan includes targets to support LPAs in achieving sustainable development and promote planning and design approaches sensitive to the landscape character, heritage, and biodiversity. This includes targets to support and encourage LPAs and developers to design and enhance walking, cycling, and other green infrastructure networks, and collaborate with local partners to improve active travel infrastructure. However, the Plan itself does not propose development or specify improvements to infrastructure.

Therefore, no likely significant effects are predicted as a result of physical damage and loss of habitat from the Plan.

Physical Loss of Habitat – Functionally Linked Habitat

4.11 Habitat loss from development in areas outside of the Habitats Sites boundaries (offsite) could also result in likely significant effects where that habitat contributes towards maintaining the interest feature for which the Habitats site is designated. This includes land which may provide offsite movement corridors or feeding and sheltering habitat for mobile species such as bats, birds and fish (usually referred to as 'functionally linked' habitat).

4.12 The Plan includes targets to support LPAs in achieving sustainable development and promote planning and design approaches sensitive to the landscape character, heritage, and biodiversity. This includes targets to support and encourage LPAs and developers to design and enhance walking, cycling, and other green infrastructure networks, and collaborate with local partners to improve active travel infrastructure. However, the Plan itself does not propose development or specify improvements to infrastructure.

Therefore, no likely significant effects are predicted as a result of physical damage and loss of functionally linked habitat from the Plan.

Non-Physical Disturbance - onsite

4.13 Noise and vibration effects are most likely to disturb bird species and are thus a key consideration with respect to Habitats Sites where birds are the qualifying features, although such effects may also impact upon some mammals and fish species. Artificial lighting at night (e.g. from streetlamps, flood lighting and security lights) is most likely to disturb bat populations and some nocturnal bird species, and invertebrate populations which are prey species to birds and mammals. Therefore, Habitats Sites where bats or nocturnal birds are a qualifying feature are most likely to be affected. Noise, vibration, and artificial lighting is associated with the construction of new housing, transport infrastructure or other development, such as improvements to sustainable transport and active travel routes.

4.14 It has been assumed (on a precautionary basis and based on our experience of previous HRAs and consultation with statutory bodies) that the effects of noise, vibration and light pollution can cause an adverse effect if development takes place within 500m of a Habitats site with qualifying features sensitive to these disturbances. This approach has been applied to HRAs of Local Plans and Local Development Plans for numerous local authorities in the UK and it has been considered the application of this buffer is appropriate and in line with a precautionary principle.

4.15 However, the Plan itself does not propose development or specify improvements to infrastructure. Instead, the Plan includes a goal to increase knowledge, appreciation, and engagement with dark skies and this includes targets to encourage community-led dark skies initiatives that help reduce light pollution and protect nocturnal environments.

Therefore, no likely significant effects are predicted as a result of non-physical disturbance from the Plan.

Non-Physical Disturbance – Functionally Linked Land

4.16 Non-physical disturbance may also affect qualifying species at functionally linked habitats, as described within the section 'Physical Loss of Habitat – Functionally Linked Habitat'. However, the plan itself does not propose development.

Therefore, no likely significant effects are predicted as a result of non-physical disturbance of functionally linked land from the Plan.

Non-Toxic Contamination

4.17 Non-toxic contamination can include the creation of dust which can smother habitats preventing natural processes. Increased sediment and dust can potentially affect the turbidity of aquatic habitats and can also contribute to nutrient enrichment of both terrestrial and aquatic habitats, which can lead to changes in the rate of vegetative succession and habitat composition.

4.18 The effects of non-toxic contamination are likely to result from development proposals. This is most likely to be significant if development takes place within 500m of a Habitats site with qualifying features sensitive to non-toxic contamination, such as riparian and wetland habitats, or sites designated for habitats and plant species which rely on these habitats. This is the distance that, in our experience, provides a robust assessment of effects on plan-level HRA and meets with the agreement of statutory bodies.

4.19 However, the Plan does not propose development or specify improvements to infrastructure.

Therefore, no likely significant effects are predicted as a result of non-toxic contamination from the Plan.

Air Pollution

4.20 In terms of vehicle traffic, nitrogen oxides (NOx, i.e. NO and NO2) are key pollutants. Deposition of nitrogen compounds may lead to both soil and freshwater acidification, and NOx can cause eutrophication of soils and water. The HRA will refer to the UK Air Pollution Information System[25] to determine whether concentrations of NOx at the Habitats Sites are currently exceeding critical loads or not.

4.21 Based on the Highways Agency Design Manual for Road and Bridges (DMRB) Document LA105: Air Quality[26] (which was produced to provide advice regarding the design, assessment and operation of trunk roads (including motorways)), it is assumed that air pollution from roads is unlikely to be significant beyond 200m from the road itself. Where increases in traffic volumes are forecast, this 200m buffer needs to be applied to the relevant roads in order to make a judgement about the likely geographical extent of air pollution impacts.

4.22 The DMRB Guidance for the assessment of local air quality in relation to highways developments provides criteria that should be applied to ascertain whether there are likely to be significant impacts associated with routes or corridors. Based on the DMRB guidance, affected roads which should be assessed are those where:

- Daily traffic flows will change by 1,000 AADT (Annual Average Daily Traffic) or more; or
- Heavy duty vehicle (HDV) flows will change by 200 AADT or more; or
- Daily average speed will change by 10 km/hr or more; or
- Peak hour speed will change by 20 km/hr or more; or
- Road alignment will change by 5m or more.

4.23 In line with the Wealden judgment[27], statutory consultees now expect to see in-combination air pollution effects assessed. The implication of the judgment is that, where the road traffic effects of other plans or projects are known or can be reasonably estimated (including those of adopted plans or consented projects), then these should be included in road traffic modelling by the local authority whose plan or project is being assessed. The screening criteria of 1,000 AADT should then be applied to the traffic flows of the plans in combination.

4.24 Roads forming part of the strategic road network[28] (motorways and trunk roads) are most likely to experience any significant increases in vehicle traffic as a result of goals, such as those relating to development, (i.e. greater than 1,000 AADT etc.) alongside some important major roads. As such, where a site is within 200m of only minor roads, no significant effect from traffic-related air pollution is considered to be the likely outcome.

4.25 The JNCC's 'Guidance on decision-making thresholds for air pollution'[29] states that, when assessing the air pollution impacts of a plan, 10km should be used as a zone of influence within which the plan is likely to have significant effects on air quality. This buffer has been applied in this assessment.

4.26 However, the Plan states:

[25] http://www.apis.ac.uk/
[26] https://www.standardsforhighways.co.uk/dmrb/search/10191621-07df-44a3-892e-c1d5c7a28d90
[27] Wealden District Council v. (1) Secretary of State for Communities and Local Government; (2) Lewes District Council; (3) South Downs National Park Authority and Natural England
[28] For the purposes of this HRA, the strategic road network relates to the primary road network within the Gower National Landscape and a 10km buffer.
[29] Available at: https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447

"*With Norfolk's visitor economy projected to grow over the next five years, adopting and promoting sustainable tourism practices is crucial to preserving and enhancing the Norfolk Coast National Landscape and protecting its most sensitive sites for generations to come.*"

4.27 The Plan does not propose new employment, housing or additional tourism accommodation and will not result in growth or directly result in an increase in visitor numbers and there should be no increase in vehicle traffic as a result of the Plan.

Therefore, no likely significant effects are predicted as a result of air pollution from the Plan.

Recreational Pressure

4.28 Recreational activities and human presence can result in significant effects on Habitats Sites as a result of erosion and trampling, associated impacts such as fire and vandalism, or disturbance to sensitive features, such as birds, through both terrestrial and water-based forms of recreation.

4.29 Habitats Sites typically have a 'Zone of Influence' (ZOI) within which increases in population would be expected to result in likely significant effects. ZOIs are usually established following targeted visitor surveys, and the findings are therefore typically specific to each Habitats site (and often to specific areas within a Habitats site). The findings are likely to be influenced by a number of complex and interacting factors and therefore it is not always appropriate to apply a generic or non-specific ZOI to a Habitats site. This is particularly the case in relation to coastal Habitats Sites, which have the potential to draw large number of visitors from areas much further afield. In contrast to coastal Habitats Sites, the ZOI for non-coastal Habitats Sites are typically less variable, with visitors travelling from areas more local to a site. Although these sites are unique in their own right, they tend to not have the same draw as coastal sites and with recreational activities more easily managed and directed to alternative greenspace in the area.

4.30 The Plan states:

"*With Norfolk's visitor economy projected to grow over the next five years, adopting and promoting sustainable tourism practices is crucial to preserving and enhancing the Norfolk Coast National Landscape and protecting its most sensitive sites for generations to come.*"

4.31 The Plan also does not propose new employment, housing or additional tourism accommodation and will not result in growth. The Plan includes targets to promote sustainable tourism and monitor and evaluate visitor numbers to the NCNL, assessing potential impacts to inform adaptive management. As such, the Plan will not directly result in an increase in visitor numbers, and therefore no impacts are considered likely in relation to increased recreational pressure as a result of the Plan.

Therefore, no likely significant effects are predicted as a result of recreational pressure from the Plan.

Water

4.32 An increase in demand for water abstraction and treatment could result in changes in hydrology at Habitats Sites. Depending on the qualifying features and particular vulnerabilities of the Habitats Sites, this could result in likely significant effects, for example due to changes in environmental or biotic conditions, water quantity, hydrology, chemistry, and the extent, condition and distribution of supporting habitats.

Water Quantity

4.33 The Norfolk Coast is supplied primarily by Anglian Water and located within the Fenland, Norfolk Happisburgh, Norfolk North Coast, and Northern Central Water Resource Zones (WRZs).

4.34 The Plan does not propose new employment and housing and will not result in growth. The Plan will not directly result in an increase in visitor numbers and as such, it is not anticipated that the goals within the Plan will result in an increased demand for water supply through abstraction or other issues.

Therefore, no likely significant effects are predicted as a result of impacts to water quantity from the Plan.

Water Quality

Water treatment and discharge

4.35 Habitats can also be affected by changes in water quality such as nutrient enrichment, changes in salinity, and runoff, discharge or spillage from industry, agriculture, or construction. Changes in water abstraction, discharge and land use can also affect water quality, for example a change in land use from agriculture to residential reduces direct nutrient run-off to watercourses but increases the volume of nutrients discharged from wastewater treatment works. Direct hydrological pathways are usually considered with regards to water quality impacts of construction upon downstream

watercourses, waterbodies and hydrologically connected Habitats Sites.

4.36 Increased levels of nitrogen and phosphorus entering aquatic environments via surface water and groundwater can severely threaten these sensitive habitats and species within a Habitats site. The elevated levels of nutrients can cause eutrophication, leading to algal blooms which disrupt normal ecosystem function and cause major changes in the aquatic community. These algal blooms can result in reduced levels of oxygen within the water, which in turn can affect the populations of many aquatic organism including invertebrates and fish. In freshwater habitats and estuaries, poor water quality due to nutrient enrichment from elevated nitrogen and phosphorus levels is one of the primary reasons for Habitats Sites being in unfavourable condition.

4.37 The Plan does not propose new employment, housing or additional tourism accommodation and will not result in growth. As such, it is not expected that goals within the Plan will result in increased demand for water treatment. The Plan also includes goals to encourage sustainable and regenerative agricultural systems and sustainable construction. No impacts are therefore predicted in relation to this impact pathway.

Direct pollution / runoff

4.38 Development has the potential to increase pollution from direct run-off at nearby Habitats Sites. This is considered likely to occur during the construction of new infrastructure, such as improvements or creation of new public rights of ways. Distances for considering impacts from direct pollution/run-off can vary depending on topography and connectivity, but a 500m buffer is applied as an initial screening distance.

4.39 However, as the Plan does not propose development or specify improvements to infrastructure, no impacts are predicted in relation to this impact pathway.

Therefore, no likely significant effects are predicted as a result of water quality impacts from the Plan.

Summary of Screening Assessment

4.40 The outcome of the screening assessment for each Habitats Site in relation to each broad impact type is summarised in **Table 4.1** below.

Table 4.1 Summary of Screening Assumptions

Habitats site	Physical damage/loss of habitat	Non-physical disturbance	Non-toxic contamination	Air Pollution	Recreational Pressure	Water Quantity	Water Quality
Norfolk Valley Fens SAC	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out
North Norfolk Coast SAC, SPA and Ramsar site	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out
Overstrand Cliffs SAC	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out
Paston Great Barn SAC	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out
Roydon Common & Dersingham Bog SAC and Ramsar site	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out
Southern North Sea SAC	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out
The Broads SAC, Broadland SPA and Ramsar site	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out

Habitats site	Physical damage/loss of habitat	Non-physical disturbance	Non-toxic contamination	Air Pollution	Recreational Pressure	Water Quantity	Water Quality
The Wash & North Norfolk Coast SAC, The Wash SPA and Ramsar site	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out
Winterton-Horsey Dunes SAC	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out
Haisborough, Hammond and Winterton SAC	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out
River Wensum SAC	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out
Inner Dowsing, Race Bank and North Ridge SAC	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out
Saltfleetby-Theddlethorpe Dunes & Gibraltar Point SAC	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out
Great Yarmouth North Denes SPA	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out
Greater Wash SPA	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out
Outer Thames Estuary SPA	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out
Breydon Water SPA and Ramsar site	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out
Breckland SPA	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out
Gibraltar Point SPA and Ramsar site	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out
Roydon Common Ramsar Site	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out	Screened Out

Chapter 5
Conclusion and Next Steps

5.1 This Screening Report has demonstrated the HRA processes that have been undertaken in relation to the Norfolk Coast National Landscape Management Plan. It has been produced to provide guidance for developing the Plan in the context of Habitats Sites, and to meet the requirements of the Habitats Regulations 2017 (as amended).

5.2 It should be recognised that a key driver for the Plan is to protect and conserve nature and the landscape. The Plan includes goals and targets to restore, create, and manage habitats and protected sites, encourage sustainability and nature-based solutions, and engage with local communities and stakeholders. Therefore, no likely significant effects were identified from any of the goals and targets set out within the Plan (as detailed in **Appendix C** and the conclusions of the screening assessment in **Chapter 4**). These goals and targets help to protect the national landscape and the Habitats Sites, which are within it. Some goals and targets aim to reduce existing threats and pressures, and therefore indirectly contribute to the conservation objectives of each Habitats site.

5.3 The Plan is a high-level Plan and is a material consideration for LPAs when considering development proposals, and when developing Local Plans, however the Plan does not propose specific actions with regards to development, growth, or tourism. Therefore, given the nature of the goals and targets, which aim to inform and support partners such as public bodies, LPAs, and eNGOs in delivering their objectives, there are no likely significant effects as a result of the Plan.

5.4 As there is no likely significant effect upon any Habitats Sites arising from this Plan alone, there is no risk that the Plan could contribute to 'in combination' effects with other plans or projects.

5.5 On the basis of the information above, it is determined that the Plan individually and/or in combination with other plans or projects, will not have a significant effect on the Habitats Sites and as a result there will be no adverse effects on the integrity of any Habitats Sites.

5.6 In accordance with the Habitats Directive and transposing legislation, given the information contained in this Screening Report and the conclusion that the Plan will not

have a significant effect on the Habitats Sites, the Plan does not need to be subject to Appropriate Assessment.

5.7 HRA is an iterative process and as such, this assessment should be updated if any relevant, newly available evidence or comments from key consultees are received prior to the plan being finalised. This report will be subject to consultation with Natural England to confirm that the conclusions of the assessment are considered appropriate at this stage of plan making.

5.8 The specific delivery mechanisms for the Management Plan, including measurable actions, lead partners and implementation detail, will be set out in supporting Action Plans. Therefore, any subsequent action plans would need to avoid impacts upon Habitats Sites, through appropriate design and implementation of proposals, initiatives and actions. Where there is potential for likely significant effects to arise from an Action Plan, it may be required to be subject to HRA. For example, key considerations for improvements or development of new green infrastructure and visitor facilities should ensure no direct or indirect impact upon Habitats Sites and their qualifying features, including mobile species. Action Plans for which likely significant effects are identified upon Habitats Sites, will be required to proceed to Appropriate Assessment stage to determine whether the Action Plan will result in Adverse Effects on Integrity (AEoI). At that stage, the Appropriate Assessment can take into account any mitigation, such as safeguards embedded within the Action Plan (e.g. establishing seasonal restrictions to public access to avoid certain areas during sensitive periods such as bird breeding season).

LUC
March 2026

Appendix A

Figures

A.1 Figure 1.1: Location and Extent of Norfolk Coast National Landscape

A.2 Figure 3.1: International Nature Conservation Designations (“Habitats Sites”) within 20km of Norfolk Coast National Landscape

Figure 1.1: Location and Extent of Norfolk Coast National Landscape

Norfolk Coast National Landscape boundary

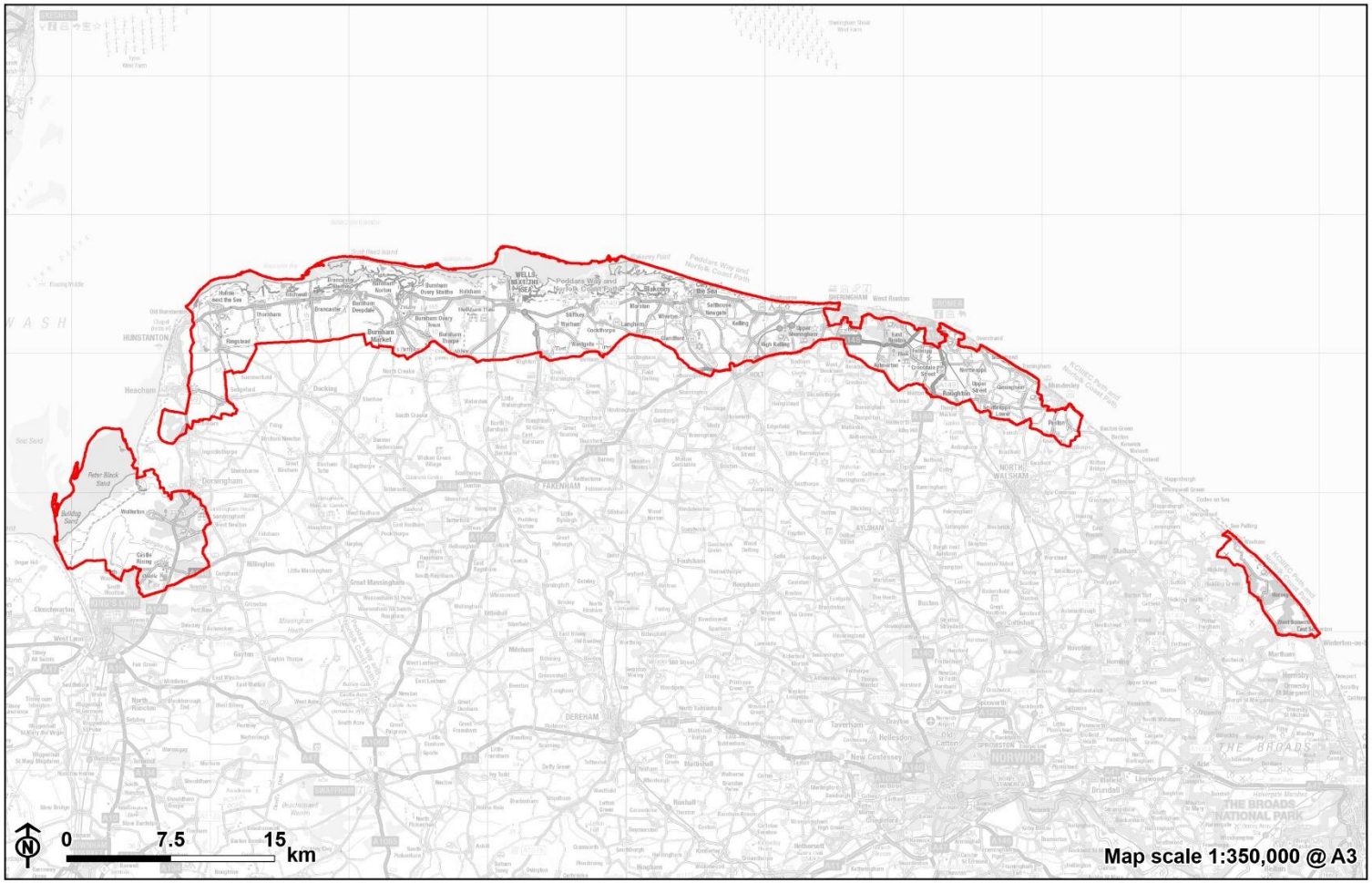
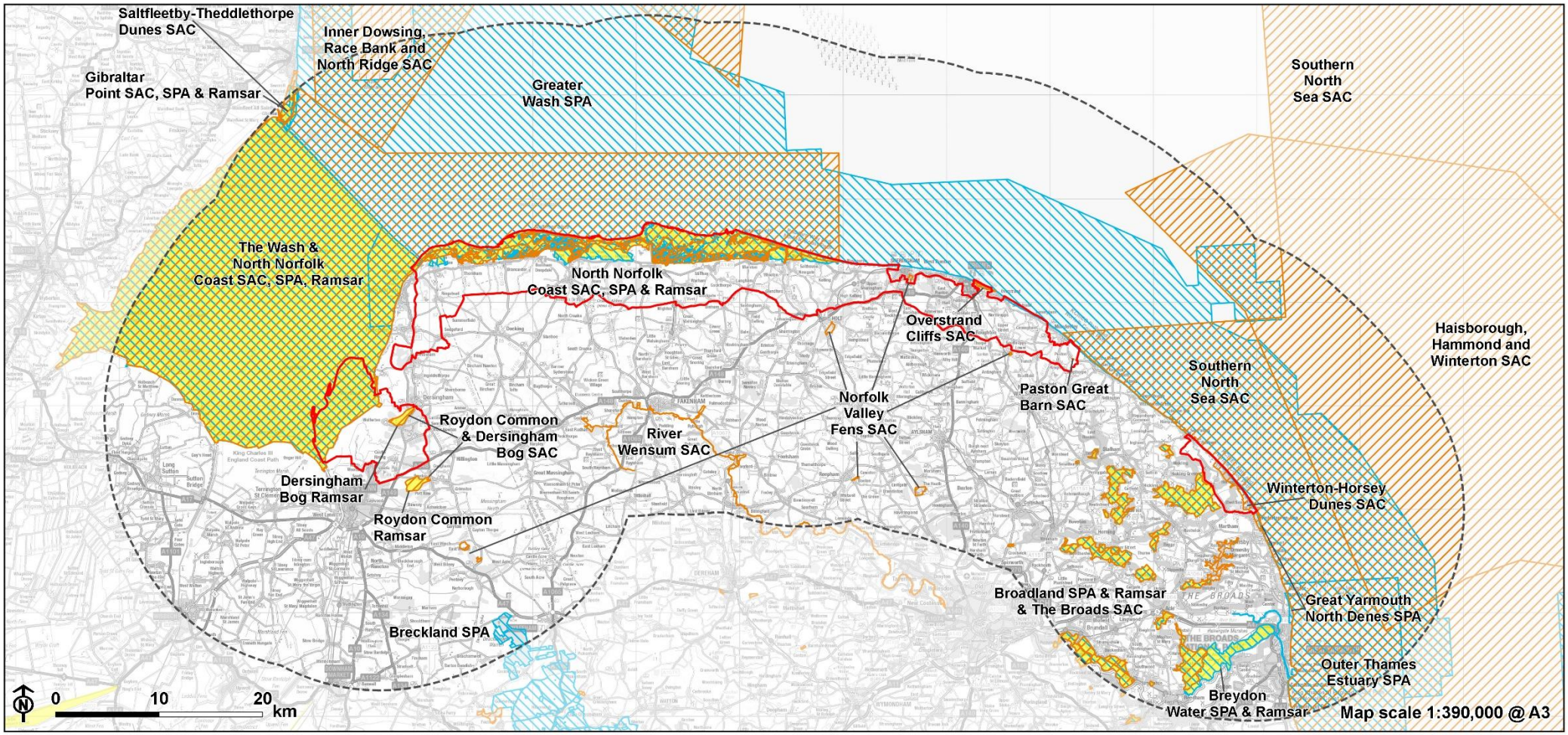


Figure 3.1: International Nature Conservation Designations (Habitat Sites) within 20km of Norfolk Coast National Landscape



Appendix B

Habitats Site Information

B.1 This appendix contains information about the Habitats Sites scoped into the HRA. Information about each qualifying features are drawn from Natural England's site information documents which include Conservation Objectives and the Standard Data Forms or Information Sheets on Ramsar Wetlands available from the JNCC website.

Table B.1 Habitats Sites

Site Code	Site Name	Qualifying Features
UK0012892	Norfolk Valley Fens SAC	Annex I habitats that are a primary reason for selection of this site: ■ Alkaline fens. Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site: ■ Northern Atlantic wet heaths with *Erica tetralix*. ■ European dry heaths. ■ Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*) (* important orchid sites). ■ Molinia meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*). ■ Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae*. *Priority feature ■ Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion, Alnion incanae, Salicion albae*) *Priority feature Annex II species that are a primary reason for selection of this site: ■ Narrow-mouthed whorl snail *Vertigo angustior*. ■ Desmoulin's whorl snail *Vertigo moulinsiana.*
UK0019838	North Norfolk Coast SAC	Annex I habitats that are a primary reason for selection of this site: ■ Coastal lagoons. * Priority feature ■ Perennial vegetation of stony banks. ■ Mediterranean and thermo-Atlantic halophilous scrubs (*Sarcocornetea fruticosi*). ■ Embryonic shifting dunes. ■ "Shifting dunes along the shoreline with *Ammophila arenaria* (""white dunes"")". ■ "Fixed coastal dunes with herbaceous vegetation (""grey dunes"")". * Priority feature ■ Humid dune slacks. Annex II species present as a qualifying feature, but not a primary reason for site selection: ■ Otter *Lutra lutra*. ■ Petalwort *Petalophyllum ralfsii*.
UK0030232	Overstrand Cliffs SAC	Annex I habitats that are a primary reason for selection of this site: ■ Vegetated sea cliffs of the Atlantic and Baltic Coasts.
UK0030235	Paston Great Barn SAC	Annex II species that are a primary reason for selection of this site: ■ Barbastelle *Barbastella barbastellus*.

Site Code	Site Name	Qualifying Features
UK0012801	Roydon Common & Dersingham Bog SAC	Annex I habitats that are a primary reason for selection of this site: ■ Northern Atlantic wet heaths with *Erica tetralix*. ■ Depressions on peat substrates of the Rhynchosporion. Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site: ■ European dry heaths.
UK0030395	Southern North Sea SAC	Annex II species that are a primary reason for selection of this site: ■ Harbour porpoise *Phocoena Phocoena*.
UK0013577	The Broads SAC	Annex I habitats that are a primary reason for selection of this site: ■ Alkaline fens (Calcium-rich spring water-fed fens). ■ Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion, Alnion incanae, Salicion albae*). ■ Calcareous fens with *Cladium mariscus* and species of the *Caricion devallianae*. ■ Hard oligo-mesotrophic waters with benthic vegetation of *Chara* spp. ■ Natural eutrophic lakes with *Magnopotamion* or *Hydrocharition*-type vegetation. ■ Transition mires and quaking bogs. Annex I habitats present as a qualifying feature, but not a primary reason for site selection: ■ Molinia meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*). Annex II species that are a primary reason for selection of this site: ■ Desmoulins whorl-snail *Vertigo moulinsiana*. ■ Little whirlpool rams-horn snail *Anisus vorticulus*. ■ Fen orchid *Liparis loeselii* Annex II species present as a qualifying feature, but not a primary reason for site selection: ■ Otter *Lutra lutra*.
UK0017075	The Wash & North Norfolk Coast SAC	Annex I habitats that are a primary reason for selection of this site: ■ Sandbanks which are slightly covered by sea water all the time. ■ Mudflats and sandflats not covered by seawater at low tide. ■ Large shallow inlets and bays. ■ Reefs. ■ Salicornia and other annuals colonizing mud and sand. ■ Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*).

Site Code	Site Name	Qualifying Features
		■ Mediterranean and thermo-Atlantic halophilous scrubs (*Sarcocornetea fruticosi*). Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site: ■ Coastal lagoons. * Priority feature Annex II species that are a primary reason for selection of this site: ■ Harbour seal *Phoca vitulina*. Annex II species present as a qualifying feature, but not a primary reason for site selection: ■ Otter *Lutra lutra*.
UK0013043	Winterton-Horsey Dunes SAC	Annex I habitats that are a primary reason for selection of this site: ■ Atlantic decalcified fixed dunes (*Calluno-Ulicetea*). ■ Humid dune slacks. Annex I habitats present as a qualifying feature, but not a primary reason for site selection: ■ Embryonic shifting dunes. ■ Shifting dunes along the shoreline with *Ammophila aremaria* (white dunes).
UK0030369	Haisborough, Hammond and Winterton SAC	Annex I habitats that are a primary reason for selection of this site: ■ Sandbanks which are slightly covered by sea water all the time. ■ *Sabellaria spinulosa* reefs.
UK0012647	River Wensum SAC	Annex I habitats that are a primary reason for selection of this site: ■ Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation. Annex II species that are a primary reason for selection of this site: ■ White-clawed (or Atlantic stream) crayfish *Austropotamobius pallipes*. Annex II species present as a qualifying feature, but not a primary reason for site selection: ■ Desmoulin's whorl snail *Vertigo moulinsiana*. ■ Brook lamprey *Lampetra planeri*. ■ Bullhead *Cottus gobio*.
UK0030370	Inner Dowsing, Race Bank and North Ridge SAC	Annex I habitats that are a primary reason for selection of this site: ■ Sandbanks which are slightly covered by sea water all the time. ■ Reefs.
UK0030270	Saltfleetby-Theddlethorpe Dunes & Gibraltar Point SAC	Annex I habitats that are a primary reason for selection of this site: ■ "Shifting dunes along the shoreline with *Ammophila arenaria* (""white dunes"")".

Site Code	Site Name	Qualifying Features
		■ "Fixed coastal dunes with herbaceous vegetation (""grey dunes"")". * Priority feature ■ Dunes with *Hippopha rhamnoides*. ■ Humid dune slacks. Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site: ■ Embryonic shifting dunes.
UK9009253	Broadland SPA	Qualifying individual species listed in Annex I of the Wild Birds Directive (Article 4.1): ■ Great bittern; *Botaurus stellaris* (Breeding) ■ Eurasian marsh harrier; *Circus aeruginosus* (Breeding) ■ Bewick's swan; *Cygnus columbianus bewickii* (Non-breeding) ■ Whooper swan; *Cygnus cygnus* (Non-breeding) ■ Hen harrier; *Circus cyaneus* (Non-breeding) ■ Ruff; *Philomachus pugnax* (Non-breeding) Qualifying individual species not listed in Annex I of the Wild Birds Directive (Article 4.1): ■ Eurasian wigeon; *Anas penelope* (Non-breeding) ■ Gadwall; *Anas strepera* (Non-breeding) ■ Northern shoveler; *Anas clypeata* (Non-breeding)
UK9009271	Great Yarmouth North Denes SPA	■ Little tern; *Sterna albifrons* (Breeding)
UK9020329	Greater Wash SPA	■ Common scoter; *Melanitta nigra* (Non-breeding) ■ Common tern; *Sterna hirundo* (Breeding) ■ Little gull; *Hydrocoloeus (Larus) minutus* (Non-breeding) ■ Little tern; *Sterna albifrons* (Breeding) ■ Red-throated diver; *Gavia stellata* (Non-breeding) ■ Sandwich tern; *Thalasseus sandvicensis* (Breeding)
UK9009031	North Norfolk Coast SPA	■ Great bittern; *Botaurus stellaris* (Breeding) ■ Pink-footed goose; *Anser brachyrhynchus* (Non-breeding) ■ Dark-bellied brent goose; *Branta bernicla bernicla* (Non-breeding) ■ Eurasian wigeon; *Anas penelope* (Non-breeding) ■ Eurasian marsh harrier; *Circus aeruginosus* (Breeding) ■ Montagu's harrier; *Circus pygargus* (Breeding) ■ Pied avocet; *Recurvirostra avosetta* (Breeding) ■ Red knot; *Calidris canutus* (Non-breeding)

Site Code	Site Name	Qualifying Features
		■ Sandwich tern; *Sterna sandvicensis* (Breeding) ■ Common tern; *Sterna Hirundo* (Breeding) ■ Little tern; *Sterna albifrons* (Breeding) ■ Waterbird assemblage
UK9008021	The Wash SPA	■ *Cygnus columbianus bewickii*; Bewick's swan (Non-breeding) ■ *Anser brachyrhynchus*; Pink-footed goose (Non-breeding) ■ *Branta bernicla bernicla*; Dark-bellied brent goose (Non-breeding) ■ *Tadorna tadorna*; Common shelduck (Non-breeding) ■ *Anas penelope*; Eurasian wigeon (Non-breeding) ■ *Anas strepera*; Gadwall (Non-breeding) ■ *Anas acuta*; Northern pintail (Non-breeding) ■ *Melanitta nigra*; Black (common) scoter (Non-breeding) ■ *Bucephala clangula*; Common goldeneye (Non-breeding) ■ *Haematopus ostralegus*; Eurasian oystercatcher (Non-breeding) ■ *Pluvialis squatarola*; Grey plover (Non-breeding) ■ *Calidris canutus*; Red knot (Non-breeding) ■ *Calidris alba*; Sanderling (Non-breeding) ■ *Calidris alpina alpina*; Dunlin (Non-breeding) ■ *Limosa limosa islandica*; Black-tailed godwit (Non-breeding) ■ *Limosa lapponica*; Bar-tailed godwit (Non-breeding) ■ *Numenius arquata*; Eurasian curlew (Non-breeding) ■ *Tringa totanus*; Common redshank (Non-breeding) ■ *Arenaria interpres*; Ruddy turnstone (Non-breeding) ■ *Sterna hirundo*; Common tern (Breeding) ■ *Sterna albifrons*; Little tern (Breeding) ■ Waterbird assemblage
UK9020309	Outer Thames Estuary SPA	■ Common tern; *Sterna hirundo* (Breeding) ■ Little tern; *Sterna albifrons* (Breeding) ■ Red-throated diver; *Gavia stellata* (Non-breeding)
UK9009181	Breydon Water SPA	■ Bewick's swan; *Cygnus columbianus bewickii* (Non-breeding) ■ Pied avocet; *Recurvirostra avosetta* (Non-breeding) ■ European golden plover; *Pluvialis apricaria* (Non-breeding) ■ Northern lapwing; *Vanellus vanellus* (Non-breeding) ■ Ruff; *Philomachus pugnax* (Passage)

Site Code	Site Name	Qualifying Features
		■ Common tern; *Sterna hirundo* (Breeding) ■ Waterbird assemblage (Non-breeding)
UK9009201	Breckland SPA	■ *Burhinus oedicnemus*; Stone-curlew (Breeding) ■ *Caprimulgus europaeus*; European nightjar (Breeding) ■ *Lullula arborea*; Woodlark (Breeding)
UK9008022	Gibraltar Point SPA	■ *Pluvialis squatarola*; Grey plover (Non-breeding) ■ *Calidris alba*; Sanderling (Non-breeding) ■ *Limosa lapponica*; Bar-tailed godwit (Non-breeding) ■ *Sterna albifrons*; Little tern (Breeding)
UK11010 (68)	Broadland Ramsar Site	Ramsar Criterion 2: ■ The site supports a number of rare plants and invertebrates including nine British Red Data Book plants and 136 British Red Data Book invertebrate species. Annex II species include: ■ Desmoulin's whorl snail, *Vertigo moulinsiana*. ■ Otter, *Lutra lutra*. ■ Fen orchid, *Liparis loeselii*. Ramsar Criterion 6 - Species/populations occurring at levels of international importance – qualifying species/populations (as identified at designation): Species with peak counts in winter: ■ Bewick's swan; *Cygnus columbianus bewickii* ■ Eurasian wigeon; *Anas Penelope*. ■ Gadwall; *Anas strepera strepera*. ■ Northern shoveler; *Anas clypeata*. Species/populations identified subsequent to designation for possible future consideration under criterion 6: Species with peak counts in winter: ■ Pink-footed goose; *Anser brachyrhynchus*. ■ Greylag goose; *Anser anser anser*.
UK11019 (751)	Dersingham Bog Ramsar Site	■ Ramsar criterion 2: Supports an important assemblage of invertebrates - nine British Red Data Book species have been recorded.
UK11048 (76)	North Norfolk Coast Ramsar Site	Ramsar criterion 1: ■ The site is one of the largest expanses of undeveloped coastal habitat of its type in Europe. It is a particularly good example of a marshland coast with intertidal sand and mud, saltmarshes, shingle banks and sand dunes. There

Site Code	Site Name	Qualifying Features
		are a series of brackish-water lagoons and extensive areas of freshwater grazing marsh and reed beds. Ramsar criterion 2: ■ Supports at least three British Red Data Book and nine nationally scarce vascular plants, one British Red Data Book lichen and 38 British Red Data Book invertebrates. Ramsar criterion 5: Assemblages of international importance: Species with peak counts in winter: ■ Waterfowl Ramsar criterion 6 – species/populations occurring at levels of international importance. Qualifying Species/populations (as identified at designation): Species regularly supported during the breeding season: ■ Sandwich tern; *Sterna (Thalasseus) sandvicensis sandvicensis* ■ Common tern; *Sterna hirundo hirundo* ■ Little tern; *Sterna albifrons albifrons* Species with peak counts in spring/autumn: ■ Red knot; *Calidris canutus islandica* Species with peak counts in winter: ■ Pink-footed goose; *Anser brachyrhynchus* ■ Dark-bellied brent goose; *Branta bernicla bernicla* ■ Eurasian wigeon; *Anas penelope* ■ Northern pintail; *Anas acuta* Species/populations identified subsequent to designation for possible future consideration under criterion 6: Species with peak counts in spring/autumn: ■ Ringed plover; *Charadrius hiaticula* ■ Sanderling; *Calidris alba* ■ Bar-tailed godwit; *Limosa lapponica lapponica*
UK11072 (395)	The Wash Ramsar Site	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

Site Code	Site Name	Qualifying Features
		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: ■ Waterfowl 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* ■ Grey plover; *Pluvialis squatarola* ■ Red knot; *Calidris canutus islandica* ■ Sanderling; *Calidris alba* ■ Eurasian curlew; *Numenius arquata Arquata* ■ Common redshank; *Tringa totanus totanus* ■ Ruddy turnstone; *Arenaria interpres interpres* Species with peak counts in winter: ■ Pink-footed goose; *Anser brachyrhynchus* ■ Dark-bellied brent goose; *Branta bernicla bernicla* ■ Common shelduck; *Tadorna tadorna* ■ Northern pintail; *Anas acuta* ■ Dunlin; *Calidris alpina alpina* ■ Bar-tailed godwit; *Limosa lapponica lapponica* Species/populations identified subsequent to designation for possible future consideration under criterion 6: Species with peak counts in spring/autumn: ■ Ringed plover; Charadrius hiaticula ■ Black-tailed godwit; *Limosa limosa islandica* Species with peak counts in winter: ■ European golden plover; *Pluvialis apricaria apricaria* ■ Northern lapwing; *Vanellus vanellus*
UK11061 (588)	Roydon Common Ramsar Site	Ramsar criterion 1: ■ The site is the most extensive example of valley mire-heathland biotope within East Anglia. – It is a mixed valley mire holding vegetation communities which reflect the influence of both base-poor and base-rich water.

Site Code	Site Name	Qualifying Features
		Ramsar criterion 3: ■ The vegetation communities have a restricted distribution within Britain. – It also supports a number of acidophilic invertebrates outside their normal geographic range and six British Red Data Book invertebrates.
UK11008 (821)	Breydon Water Ramsar Site	Ramsar criterion 5: Assemblages of international importance: Species with peak counts in winter: ■ Waterfowl Ramsar criterion 6 – species/populations occurring at levels of international importance. Qualifying Species/populations (as identified at designation): Species with peak counts in winter: ■ Tundra swan; *Cygnus columbianus bewickii* ■ Northern lapwing; *Vanellus vanellus* Species/populations identified subsequent to designation for possible future consideration under criterion 6: Species with peak counts in winter: ■ Pink-footed goose; *Anser brachyrhynchus* ■ Eurasian wigeon; *Anas penelope*, ■ Northern shoveler; *Anas clypeata* ■ European golden plover; *Pluvialis apricaria apricaria* ■ Black-tailed godwit; *Limosa limosa islandica*
UK11027 (589)	Gibraltar Point Ramsar Site	Ramsar criterion 1: ■ The dune and saltmarsh habitats present on the site are representative of all the stages of colonisation and stabilisation. There is a fine example of freshwater marsh containing sedges *Carex* spp., rushes *Juncus* spp., and ferns, including adder's-tongue fern *Ophioglossum vulgatum*. Also most northerly example of nationally rare saltmarsh/dune communities containing sea heath *Frankenia laevis*, rock sea lavender *Limonium binervosum* and shrubby seablite *Suaeda vera*. Ramsar criterion 2: ■ Supports an assemblage of wetland invertebrate species of which eight species are listed as rare in the British Red Data Book and a further four species listed as vulnerable. Ramsar criterion 5: Assemblages of international importance: Species with peak counts in winter: ■ Waterfowl

Site Code	Site Name	Qualifying Features
		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: ■ Grey plover; *Pluvialis squatarola* ■ Sanderling; *Calidris alba* ■ Bar-tailed godwit; *Limosa lapponica lapponica* Species with peak counts in winter: ■ Dark-bellied brent goose; *Branta bernicla bernicla* Species/populations identified subsequent to designation for possible future consideration under criterion 6: Species with peak counts in spring/autumn: ■ Red knot; *Calidris canutus islandica*

Appendix C

Screening of Goals and Targets in the Management Plan

Table C.1 Screening of Goals and Targets in the Management Plan

Priority	Goal and Targets	Potential for Likely Significant Effect (LSE)?
Nature recovery	Goal 1: Thriving plans and wildlife (PTLOF) ■ Goal 1 sets out five targets to restore, create, and manage wildlife-rich and priority habitats outside of protected sites, bring SSSIs into favourable condition, and encourage land managers to adopt nature-friendly farming.	No LSE – the goal and targets will not result in development, and seeks to improve SSSI condition, which would be positive for associated Habitats Sites.
	Goal 2: Assess & enhance management of designated sites, priority habitats & species ■ Goal 2 sets out 12 targets to support the restoration, creation, and enhancement of priority habitats and locally designated sites, including the prevention and control of invasive non-native species (INNS), strengthen habitat connectivity, improve monitoring of nature recovery, promote nature-based solutions and agri-environment schemes among landowners, and develop opportunities for nature recovery within cycling and walking routes and green and open spaces.	No LSE – the goal and targets will not result in development and it is likely to have a positive effect on Habitats Sites through supporting nature recovery.
	Goal 3: Strengthen partnership working to deliver better outcomes for nature ■ Goal 3 sets out two targets to enhance the coordination of nature recovery, secure new funding and create green jobs to foster partnerships for nature recovery and sustainable growth.	No LSE – the goal and targets will not result in development and will not have any impact on Habitats Sites as it is about strategic coordination of funding and delivery partners.
	Goal 4: Increase nature recovery engagement opportunities ■ Goal 4 sets out two targets to engage, support, and develop local communities in nature recovery.	No LSE – the goal and targets will not result in development and is likely to have a positive effect on Habitats Sites by supporting nature recovery.
Climate adaptation & mitigation	Goal 5: Mitigating and adapting to climate change (PTLOF) ■ Goal 5 sets out three targets to mitigate climate change by reduce greenhouse gas emissions in protected landscapes, restoring peat, and increasing tree and woodland cover.	No LSE – the goal and targets will not result in development and is likely to have a positive effect on Habitats Sites through supporting long-term climate mitigation.
	Goal 6: Reduce emissions from transport, agricultural practices & the built environment ■ Goal 6 sets out eight targets to support the development of green infrastructure networks and promote sustainable transport, agriculture, construction, development, and business.	No LSE – the goal and targets will not result in development and is likely to have a positive effect on Habitats Sites through supporting reduction in environmental pollution.

Priority	Goal and Targets	Potential for Likely Significant Effect (LSE)?
	Goal 7: Support people and places to adapt to climate change and build sustainable, resilient communities ■ Goal 7 sets out four targets to promote sustainability within local communities through engagement with the public, local authorities, and stakeholders.	No LSE – the goal and targets will not result in development and will likely have a positive effect on Habitats Sites through supporting reduction in environmental pollution.
Sustainable development	Goal 8: Reduce the impacts of development on habitats and species ■ Goal 8 sets out three targets to collaborate with and support and encourage local authorities to incorporate nature-based solutions.	No LSE – the goal and targets will not result in development and is likely to have a positive effect on Habitats Sites by supporting nature-friendly development.
	Goal 9: Reduce the impacts of developments on landscape character and heritage features ■ Goal 9 sets out one target to encourage developers to protect and enhance landscape character and heritage.	No LSE – the goal and targets will not result in development and is likely to have positive effect on Habitats Sites through protection of landscape.
	Goal 10: Increase the sustainability of the visitor economy for the benefit of the environment and host communities ■ Goal 10 sets out four targets to manage tourism by promoting sustainability, safeguarding habitats and species, and supporting local businesses.	No LSE – the goal and targets will not result in development and is likely to have a positive effect on Habitats Sites by promoting sustainable tourism.
	Goal 11: Improve visitor engagement with protected landscapes ■ Goal 11 sets out five targets to improve visitor engagement and protection of the landscape through adaptive management and assessment of visitor numbers and impacts.	No LSE – the goal and targets will not result in development and is likely to have a positive effect on Habitats Sites through managing visitors.
	Goal 12: Increase knowledge, appreciation and engagement with dark skies ■ Goal 12 sets out four targets to promote and encourage dark skies through engagement with communities.	No LSE – the goal and targets will not result in development and is likely to have a positive effect on Habitats Sites by promoting dark skies initiatives.
	Goal 13: Enhancing heritage & engagement with the natural environment (PTLOF) ■ Goal 13 sets out two targets to protect heritage assets and improve accessibility and engagement within protected landscapes.	No LSE – the goal and targets will not result in development and will not have an impact on Habitats Sites as it supports protection and engagement with heritage assets.
	Goal 14: Increase appreciation and stewardship of local heritage	No LSE – the goal and targets will not result in development and will not have any impact

Priority	Goal and Targets	Potential for Likely Significant Effect (LSE)?
	■ Goal 14 sets out one target to support and encourage people to value, engage with, and conserve heritage assets.	on Habitats Sites as it supports appreciation of heritage assets.
Local communities	Goal 15: Empower communities to actively care for the National Landscape ■ Goal 15 sets out four targets to celebrate and support local communities, businesses, and products by promoting stewardship and collaboration in order to contribute to sustainability within the national landscape.	No LSE – the goal and targets will not result in development and will not have any impact on Habitats Sites as it supports community awareness and protection of the national landscape.
	Goal 16: Support the health & wellbeing of local communities through connection with nature ■ Goal 16 sets out three targets that promote engagement with nature.	No LSE – the goal and targets will not result in development and will not have any impact on Habitats Sites as it supports community connection with the national landscape.