

# **Habitats Regulation Assessment – supplementary document**

## **1. Introduction**

As part of the development of the East of England Implementation Plan, a Habitats Regulations Assessment (HRA) was undertaken on the consultation version of the Implementation Plan. This HRA, carried out by Enviro Consulting Ltd, was published alongside the Implementation Plan for consultation in May-July 2009.

This report is supplementary to that HRA report. In particular, it aims to:

- give an overview of the key changes to the Implementation Plan that have resulted from the HRA process
- respond to the particular queries that were raised by the HRA and by Natural England
- build on the HRA to take account of any changes to the final Implementation Plan as a result of the consultation exercise.

This supplementary document has been drafted with advice and guidance from Natural England. In particular, Natural England has worked with EEDA and EERA to agree the following processes:

- checking and sourcing the programmes and priorities within the Implementation Plan to ascertain their policy origins
- reviewing and responding to the queries raised by the original HRA
- analysing any locationally specific references that have been made to the Implementation Plan since the HRA was published
- clarifying any issues to do with terminology in the original HRA

This document pulls together in one place the original HRA comments, any additional assessment carried out on new parts of the Implementation Plan, Natural England's comments and EEDA/EERA's response.

It should be noted that the East of England Regional Spatial Strategy (RSS) has also be subject to an HRA. The main findings of that HRA confirm that the policy framework outlined within the RSS specifically promotes the importance of sustainable development and the need for protection of Natura 2000 (or Ramsar) sites.<sup>1</sup> The Regional Economic Strategy (RES) for the East of England has been subject to an Integrated Sustainability Appraisal (ISA)

---

<sup>1</sup> Natura 2000 is a network of areas designated to conserve natural habitats and species that are rare, endangered, vulnerable or endemic within the European Community.

## 2. HRA – consultation draft

Enviros Consulting Ltd conducted an HRA on the consultation draft of the Implementation Plan in March 2009. This was a screening exercise to identify any programmes or priorities in the plan which could have a Likely Significant Effect (LSE) on any Natura 2000 or Ramsar sites. As part of this process it pointed to a number of areas where wording in the Implementation Plan should be changed in order to ensure that the programmes or priorities did not have a LSE on any Natura 2000 sites (or Ramsar sites) and therefore would not require the Appropriate Assessment (AA) stage to be undertaken.

The main justifications given in the original HRA Screening Report for there being no Likely Significant Effects were as follows:

- *“the programme will not be worded to specifically lead to developments, schemes or projects through this programme alone, because it will be implemented through sub-ordinate policies or programmes at the sub-regional level which are more detailed and therefore more appropriate to assess for their effects on European Site and associated sensitive areas, and/or,*
- *the programme will make provision for a scheme, project or development at one or more broad locations such as a county, district, or sub-region, but the location and nature of the development is no more precise than this at this stage, and is to be selected following detailed consideration of options in lower tier plans set out in development planning process.”<sup>2</sup>*

A number of changes were made to the consultation draft, prior to its publication, as a result of recommendations from the HRA where it was not possible to conclude no LSE. Other changes have been made to the final Implementation Plan. These changes are indicated in Table 1 in this supplementary document under ‘EEDA/EERA response’.

For avoidance of doubt, it is necessary to clarify an area of terminology in the original HRA. In Table 4 that assessed sub-regional priorities, Enviro occasionally made reference to sub-regional ‘policy’ in the draft Implementation Plan in the comments/justification column. However, the Implementation Plan uses the terminology sub-regional ‘priorities’ as no new policy is being proposed. Where Enviro use the term sub-regional policy in this context, it should be deemed to refer to sub-regional priorities.

## 3. HRA – final report

### 3.1 Overview

---

<sup>2</sup> Enviro Consulting Ltd, March 2009

As a result of the consultation responses to both the Implementation Plan and the HRA t report, a number of changes were made to the final Implementation Plan. These included:

- a reduction in the number of programmes
- more information on delivery, resources and results
- less contextual information with some of the data evidence moved into a supporting document
- more information on the challenges of the recession
- more information on the phasing of short term priorities
- some wording changes suggested by regional and sub-regional partners

The programmes in the final version of the Implementation Plan have been set out in column one of Table 1. The original HRA comments have been mapped against the new programmes. Given a number of programmes have been merged with one another, in many cases a number of original HRA comments have been allocated to a new programme.

A number of programmes were not included in the final draft as the content of the programme was moved into a delivery section. These are:

- Strengthening links between Housing and Local Strategic Partnerships/Local Area Agreements (Housing)
- Development of innovative funding mechanisms for funding transport interventions (Transport)
- Sustainable engineering – technology and skills transfer (Utilities)

All of these programmes were viewed as not having a likely significant effect on a European or Ramsar Site.

### 3.2 Screening results

Table 1: Themes

Programme [name and change from consultation version)	HRA: Screening comments, with Natural England's comments where appropriate <sup>3</sup>	EEDA/EERA response.	Likely Significant Effects
<b>Housing</b>			
<p><b>1 Ensuring the supply of market and affordable homes</b></p> <p>This programme links four previous programmes - Large Sites for Housing, Employment and Mixed Uses, Monitoring and Intelligence, Innovative Approaches to the Joint Commissioning of Affordable Housing and Short-term response to the credit crunch and recession.</p> <p>The final version of the</p>	<p><u>Large sites for Housing, Employment and Mixed Uses</u> Not part of original assessment</p> <p><u>Monitoring and intelligence</u> This programme is focussed upon monitoring and data collection and will not itself directly lead to development. It supports a region-wide remit to assess housing delivery against RSS Policy H2 – Phasing of Housing Development. Policy H2 requires that the phasing takes “account of the need for additional water infrastructure for supply and/or treatment, as provided for under Policy WAT2”.</p>	<p>The national growth areas and regional growth points are referenced in the RSS.</p> <p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects</p> <p>Natural England agrees with no LSE conclusion as this programme in itself will not lead to development as it is not a land use planning proposal. We do not recommend any further changes to the Implementation Plan.</p>

<sup>3</sup> Comments from Table 3, Habitats Regulations Assessment of the East of England Implementation Plan, Enviro Consulting March 2009. Where Natural England has made additional comments to the HRA in correspondence with EEDA/EERA, these have also been included.

<p>Implementation Plan also includes reference to the national growth areas and regional growth points also noted, Peterborough, Stevenage, Chelmsford, Norwich, Kings Lynn, Haven Gateway and Thetford.</p>	<p>Policy WAT2 further requires impacts on ES to be avoided. It is considered that the programme would not negatively impact upon a ES.</p> <p><u>Innovative approaches to the joint commissioning of sustainable affordable housing</u> The programme will not directly lead to development. It is more of an information sharing exercise and is designed to access different sources with a region-wide remit, though particular focus on the engines of growth. It is considered that the programme would not negatively impact upon a ES.</p> <p><u>Short term response to the credit crunch and recession</u> This programme follows a region-wide remit to support, through a number of means, the delivery of RSS Policies H1 and H2 in providing additional housing requirements. There is particular focus on major strategic sites and growth areas. Policy H2 requires that phasing takes “account of the need for additional water infrastructure for supply and/or treatment, as provided for under Policy WAT2”. Policy WAT2 further requires impacts on</p>		
--	---	--	--

	<p>ES to be avoided. Housing delivery and development will continue to be implemented through sub-ordinate policies/local development frameworks which are appropriately detailed to assess effects on ES and associated sensitive areas. It is considered that the programme would not negatively impact upon a ES.</p> <p><u>Additional comments from Natural England</u>  Natural England is listed as one of the key delivery agents under sub-heading 1a “Regional Collaboration on the approach to integrated delivery”. We do not therefore recommend any further changes to the text of the Implementation Plan.</p>		
<p><b>2 Increasing the supply of affordable homes in rural areas</b></p> <p>This programme builds on the original programme Rural Exception Sites</p>	<p><u>Rural exception sites</u>  The fundamental aim of this programme is to increase the number of affordable homes produced in rural areas through the support of CLTs. This programme makes provision for a type of development within rural areas generally. The quantity and location of development will be decided on a</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects.</p> <p>Natural England agrees with no LSE conclusion.</p>

	<p>demand basis and planned/delivered through lower tier plans which are more detailed and therefore more appropriate to assess potential impacts upon ES.</p> <p><u>Additional comments from Natural England</u>  This programme in itself will not lead to development as it is not a land use planning proposal. We do not recommend any further changes to the implementation Plan.</p>		
<p><b>3 Increasing the efficiency and effectiveness of existing homes</b></p> <p>This programme builds on the original programme, Improving energy efficiency – in existing stock</p>	<p><u>Improving energy efficiency – in existing stock</u>  The programme will not directly lead to development. It is targeted at improving the thermal and lighting efficiency of existing homes to reduce carbon emissions.  It is considered that the programme would not negatively impact upon a ES.</p> <p><u>Additional comments from Natural England</u>  Natural England would support moves to improve energy efficiency in both new</p>	<p>The programme will be promoting behavioural change in all aspects of resource efficiency.</p> <p>No change is needed to text of Implementation Plan.</p>	<p>No likely significant effects.  Natural England agrees with no LSE conclusion</p>

	builds and in existing stocks, but these needs to be backed up by <u>behavioural changes</u> in order to sustain any reductions.		
<p><b>4 Skills and support for delivering and managing sustainable communities</b></p> <p>This programme combines two programmes from the consultation draft (Skills for Planning, Delivering and Managing Sustainable Communities and Strategic Development and Research Unit) that aim to improve the overall sustainability of developments. A duplicate programme was also originally included in the Skills theme.</p> <p>In the final Implementation Plan, the exemplar carbon challenge project in Peterborough is referenced.</p>	<p><u>Skills for Planning, Delivering and Managing Sustainable Communities</u></p> <p>This programme aims to ensure that the skills are available to deliver growth in the region sustainably. No spatial or development related activities are proposed within this programme. Its focus includes ensuring provision of the skills necessary for growth in accordance with RSS Policy SS1 and the principles of sustainable development - including conserving, and enhancing the natural environment. It is considered that the programme would not negatively impact upon a ES.</p> <p><u>Strategic Development and Research Unit</u></p> <p>This programme does not directly relate to development, but rather to providing support and services to those in the planning process to deliver growth, particularly within the KCDCs. Development would then be implemented</p>	<p>The carbon challenge project in Peterborough has already been approved and is being developed in place.</p> <p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects.</p> <p>Natural England agrees with no LSE conclusion</p>

	<p>through sub-ordinate policies which would assess effects on European Site and associated sensitive areas. It is considered that the programme would not negatively impact upon a ES.</p> <p><u>Additional comments from Natural England</u> This programme will not in itself lead to development as it is not a land use planning proposal. It will therefore not have any significant effects on any N2K sites. We do not recommend any further text changes to the Implementation Plan.</p>		
NOTE: A former programme – Strengthening links between housing and LSPs - is no longer included in the Implementation Plan as a separate programme. It is recorded here for information.	The programme has a region-wide remit to support the representation of housing needs within lower tier strategies, partnerships and plans. The programme will not directly lead to development. It is considered that the programme would not negatively impact upon a ES.	No change needed to text of Implementation Plan.	No likely significant effects
<b>Transport</b>			
<b>1 Managing transport in growing and congested urban areas</b>	<p><u>Congestion-busting measures in fast-growing and larger urban areas (including demand management).</u> This programme relates to the better use</p>	<p>No change needed to text of Implementation Plan.</p> <p>All the examples of</p>	<p>No likely significant effects.</p> <p>Natural England agrees with no LSE conclusion</p>

<p>This programme combines two programmes from the consultation draft of the transport theme (Congestion-busting measures in fast-growing and larger urban areas and Transport interventions to facilitate sustained and sustainable housing and jobs growth, focusing on KCDCs), and also incorporates the Real time information systems and intelligent transport from the Utilities theme.</p> <p>In the final Implementation Plan, Ipswich town centre scheme, Chesterton Station, Cambridgeshire guided bus, Luton Dunstable guided bus are referenced as examples of sustainable transport improvements</p>	<p>of existing transport networks and qualitative measures to reduce congestion. The programme will not in itself lead to development and is considered to be of a kind that could have no negative effects on ES.</p> <p><u>Transport interventions to facilitate sustained and sustainable housing and jobs growth, focusing on KCDCs.</u></p> <p>The objective of this Programme is to ensure that transport issues are not a barrier to the delivery of the housing and job growth targets set out in the regional strategies. The programme mostly relates to the development of programmes and strategies and advocates the progression and planning of developments and transport services. It is considered that the programme would not negatively impact upon a ES as no development could occur through programme alone. Its objectives are implemented through subordinate policies which are more detailed and therefore more appropriate to assess for their effects on ES and associated sensitive areas.</p> <p><u>Real time information systems.</u></p> <p>Reduce congestion and travel time by</p>	<p>sustainable transport improvements are sourced from tables 2, 3 and 4 within Appendix A of the East of England Plan.</p> <p>The assessment of the East of England Plan did consider the proposals contained in appendix A. While individual schemes would be subject to further testing, on “in combination effects” the assessment stated:</p> <p><i>In assessing potential in-combination effects, consideration was given to the effects of policies in the RSSs for the neighbouring regions (the East Midlands, South East and London). Consideration was also given to projects which will be brought forward under other consenting regimes outside the framework of the RSS/LDDs (such as the Strategic Transport</i></p>	
---	---	--	--

	<p>giving people access to real time information on public transport journeys (timetables and whether trains/buses etc are on time or delayed), road congestion, parking availability and costs, and on the most efficient means of making a particular point to point journey. This would build on the web based platform Transport Direct and would primarily be focussed on ensuring a standardisation of information input from transport providers.</p> <p><u>Intelligent transport.</u> This is a repetition of Real-time information systems above. If this policy remains then answer would be the same as above.</p> <p><u>Additional comments from Natural England</u> Natural England would support the measures outlined in this programme which aims to reduce the overall amount of travel. This programme will not in itself lead to any development as it is not a land use planning proposal. We would therefore agree with a conclusion of no LSE on N2K sites.</p>	<p><i>Infrastructure Priorities identified in Appendix A of the RSS.</i></p>	
--	---	--	--

<p><b>2 Improving governance of inter-urban transport corridors</b></p> <p>This programme combines two programmes from the consultation draft (Developing key passenger rail links of high economic value, including links to London and Addressing key inter-urban constraints where strong benefits to economic performance can be demonstrated clearly).</p>	<p><u>Developing key passenger rail links of high economic value, including links to London.</u>  This programme aims to support improvements in the quality and quantity of public transport services provided by the rail network and to promote its use, in line with RSS Policies T1 and T5. No development could occur through this programme alone, because it is implemented through sub-ordinate policies which are more detailed and therefore more appropriate to assess for their effects on ES and associated sensitive areas.</p> <p><u>Addressing key inter-urban constraints where strong benefits to economic performance can be demonstrated clearly.</u>  This programme advocates support for qualitative and quantitative improvements to strategic transport links relating to economic outcomes. The programme makes provision for physical development to improve rail network/station improvements and road junctions/trunk road bottleneck areas and uses examples of specific locations, (e.g. the Hitchin ECML junction, Beccles loop</p>	<p>In response to the HRA, and following advice from Natural England, examples of specific locations of transport improvements were omitted from the consultation and final Implementation Plan. No other qualifications to the text are required.</p>	<p>No likely significant effects.</p> <p>Natural England additional comments:  This programme appears to be delivering policies T1-T5 of the RSS which has already been subject to a HRA. Natural England disagreed with the conclusion of no effect on site integrity for Policy T1 due to potential impacts on Epping Forest SAC and the Broads SAC/SPA and Ramsar.</p>
---	--	--	---

	<p>etc). Advice to be sought from Natural England.</p> <p>This programme involves research into technologies and systems to reduce congestion and travel times. The programme will not itself lead to development and is not considered to be of a kind that would have negative effects on ES</p> <p><u>Additional comments from Natural England</u>  Natural England agrees that no development could occur through this programme and is concerned with delivering the priorities outlined in Policies T1-T5 of the RSS which has already been subject to a HRA. We also support the fact that there are no longer any locationally specific schemes mentioned in the Implementation Plan.</p>		
<p><b>3 Improving journeys to international gateways and freight destinations</b></p> <p>This programme comprises two programmes from the</p>	<p><u>Connections to international gateways.</u>  This programme focuses on the provision of sustainable transport links to international gateways including airports, ports and rail and relates to the delivery of RSS Policies T1, T10, T11 and T12.</p>	<p>The Felixstowe to Nuneaton project is enhancement works to the existing lines. In addition, the Felixstowe to Peterborough part of</p>	<p>No likely significant effects.</p> <p>Agree no further changes to text is required.</p>

<p>consultation draft (Connections to international gateways and Sustained shift of freight from road to rail, including in relation to Felixstowe to Nuneaton).</p> <p>In the final Implementation Plan, Ebbsfleet and St Pancras are given as examples of international gateways</p>	<p>RSS Policy T11 notes that all improvements to access associated with the region's ports should avoid any adverse impact on ES. Policy T1 is in line with the Regional Transport Strategy and promotes managing travel to minimise environmental impacts. No development could occur through this programme alone, because it is implemented through sub-ordinate policies which are more detailed and therefore more appropriate to assess for their effects on ES and associated sensitive areas.</p> <p><u>Sustained shift of freight from road to rail, including in relation to Felixstowe to Nuneaton.</u></p> <p>This programme relates to RSS Policy T10 and includes specific rail strategies/ schemes which are already planned through wider/sub-ordinate strategies or underway to improve rail freight. Related development is therefore planned and/or will be implemented through sub-ordinate policies which are more detailed and therefore more appropriate to assess for their effects on ES and associated sensitive areas. EEDA to check that the following are either already planned and impacts have been assessed through</p>	<p>the gauge enhancement works (also listed in table 2 within Appendix A of the East of England Plan) was part of the authorisation for the extension of Felixstowe Port.</p> <p>No change is needed to the text of the implementation plan.</p>	
--	--	--	--

	wider strategies, underway, or of a kind that would not involve significant development.		
<p><b>4 Ensuring transport contributes to performance of small market towns, rural and coastal areas</b></p> <p>This comprises two programmes Addressing access in town centres and Improving access to key services in rural areas.</p>	<p><u>Addressing access in town centres, particularly in priority regeneration areas.</u> This programme aims to identify policy and physical barriers to transport provisions for town centres and infrastructure improvements to enhance local sustainable transport links. No development could occur through this programme alone, because it is implemented through sub-ordinate policies which are more detailed and therefore more appropriate to assess for their effects on ES and associated sensitive areas.</p> <p><u>Improving access to key services in rural areas.</u> This programme relates mostly to research, problem solving and innovation in transport planning/services (or alternatives) to improve access to key services for rural communities. The spatial context of this programme will be determined through the identification of areas of need. No development could occur through this programme alone,</p>	No change needed to text of Implementation Plan.	<p>No likely significant effects.</p> <p>Natural England agrees with no LSE conclusion.</p>

	because it does not directly prescribe development. It is not considered to be of a kind that would have negative effects on ES.		
<b>Utilities</b>			
<p><b>1 Developing low carbon energy sectors to facilitate sustainable economic growth</b></p> <p>This programme comprises five original programmes in the consultation draft listed here.</p>	<p><u>Regional low carbon electricity programme</u>  This programme relates to RSS Policy ENG2 in supporting the development of new facilities for renewable energy generation.  Most aspects of this theme are qualitative. There are aspects that may involve physical development, such as <i>improving access to the electricity network</i>, which may involve cable-laying and transfer station development, though no spatial element is considered here.  No development could occur through this programme alone, because it is implemented through sub-ordinate policies which are more detailed and therefore more appropriate to assess for their effects on ES and associated sensitive areas.</p> <p><u>Regional low carbon transport fuels programme</u></p>	<p>In response to the comment relating to the carbon transport fuels programme, in the final plan the low carbon transport fuels component of the Low Carbon Energy Sectors Programme no longer contains this as an activity.</p> <p>Where low carbon heat delivery covers biomass, again, this has been removed from the programme components in the final draft in response to the HRA.</p> <p>The development of district heating and renewables in new development remains in</p>	<p>No likely significant effects</p> <p>Natural England agrees with no LSE conclusion. This programme is also delivering policy ENG1 from the RSS which has been subject to a HRA already.</p> <p>EEDA/EERA comment - Also reflects policy ENG2 of East of England Plan.</p>

	<p>This programme is mostly qualitative in nature and concerns research and support to improve bio-fuels availability and markets. One element, the infrastructure development programme to support second generation biofuels, advocates support for developments of a particular type. However, the programme has a region wide remit. The location of the development is to be selected following consideration of options in lower tier plans (development plan documents). Natural England to give comment on this programme please.</p> <p><u>Regional low carbon heat programme</u>  This programme aims to promote renewable heat generation and use through qualitative measures to support the supply and integration of renewable energy products and technologies.  The programme supports the provision of renewable energy within developments but will not in itself lead to development and is not considered to be of a kind that could have an adverse effect up a ES.</p>	<p>the final plan, however, the HRA concludes that this is not an issue as it does not in itself lead to development.</p> <p>No further changes needed to the text of the final Implementation Plan</p>	
--	--	---	--

	<p>Natural England to make comment please.</p> <p>RE: Programme specifically supports CHP/Biomass and energy from waste, which if promoted on large scale and could have an acid deposition effect on habitats. *** Each development would go through EIA but if there is a push on this type of development could there be a cumulative impact?</p> <p><u>Carbon capture and storage regional supply chain</u></p> <p>This programme aims to develop technologies and supply chains for CCS in view of the future potential carbon based and economic opportunities it promises.</p> <p>The programme will not itself lead to development and is not considered to be of a kind that would have negative effects on ES.</p> <p><u>Community energy solutions</u></p> <p>This programme aims to support community energy solutions through qualitative means. The programme will not itself lead to development and is not</p>		
--	--	--	--

	<p>considered to be of a kind that would have negative effects on ES.</p> <p><u>Additional comments from Natural England</u></p> <p>This programme in itself will not lead to development as it is not a land use planning proposal. We do not recommend any further changes to the implementation Plan. We support the fact that reference to biomass has been removed from the Imp Plan.</p>		
<p><b>2 Delivering required water and waste water infrastructure</b></p> <p>This programme builds on the Long term water planning programme in the consultation draft.</p> <p>Reference is made to resource development including Abberton reservoir in Essex</p>	<p><u>Long term water planning</u></p> <p>This programme involves research and planning into water resource management. The programme includes qualitative means by which to reduce/manage water abstraction to improve water quality and to achieve good ecological status or good ecological potential in designated water bodies through the River Basin Planning Process.</p> <p>This programme is intended to conserve and enhance the natural environment, and such enhancement measures are</p>	<p>No change needed to text of Implementation Plan.</p> <p>Works on extending the Abberton reservoir were granted permission by Colchester BC in April 2009.</p>	<p>No likely significant effects</p> <p>Natural England agrees with no LSE conclusion.</p>

	<p>likely to have positive impacts upon ES and associated sensitive areas. The programme will not itself lead to development and is not considered to be of a kind that would have negative effects on ES.</p> <p><u>Additional comments from Natural England</u></p> <p>This programme would not lead to development as it is concerned with planning the region's water resources. Natural England would support any measure put in place to reduce abstraction, improve water quality and / or enhance the natural environment.</p>		
<p><b>3 Moving to better water efficiency</b></p> <p>This programme comprises five original programmes in the consultation draft listed here.</p>	<p><u>Domestic water efficiency</u></p> <p>The programme is aimed at increasing water use efficiency through the dissemination of information, changing water use behaviour and encouraging the use of devices, audits and leakage control measures. The programme will not itself lead to development and is not considered to be of a kind that would have negative effects on ES. (A residual positive impact upon</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects. Natural England agrees with the no LSE conclusion.</p>

	<p>ES may result in the long term through reduced water abstraction).</p> <p><u>Non-household water efficiency programme</u>  This programme aims to increase awareness of water efficiency issues and reduce water abstraction/use by agricultural, commercial and industrial users through information dissemination and changing water use practices. The programme will not itself lead to development and is not considered to be of a kind that would have negative effects on ES. (A residual positive impact upon ES may result in the long term through reduced water abstraction).</p> <p><u>Regional water monitoring</u>  The programme will not itself lead to development and is not considered to be of a kind that would have negative effects on ES.</p> <p><u>Additional comments from Natural England</u>  Natural England support this programme as it is aimed at conserving the region's water supply.</p>		
--	--	--	--

<p><b>4 Upgrading regional broadband speed and access</b></p> <p>This programme builds on the regional broadband improvement programme. Business ICT engagement and ICT and flexible working have been moved into the Enterprise theme. Intelligent transport and Real time information systems has been moved into the Transport theme.</p>	<p><u>Regional Broadband improvement programme</u></p> <p>This programme includes the provision of schemes for excluded communities and promotion of broadband provision in new developments, through planning legislation. In spatial terms, the programme recognises the likely focus of private sector investment will be areas of high population density and that rural areas are at risk of exclusion. Where any physical impacts could result through the provision of services, subordinate policies and legislation will be at a more detailed and relevant level to assess for effects on ES and associated sensitive areas.</p> <p><u>Additional Natural England comments</u></p> <p>This programme in itself will not lead to development as it is not a land use planning proposal. We do not recommend any further changes to the implementation Plan.</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects.</p> <p>Natural England agrees with no LSE conclusion.</p>
<p><b>5 Providing required regional waste infrastructure</b></p> <p>This programme comprises</p>	<p><u>Development of waste recovery and disposal infrastructure</u></p> <p>This programme aims to support the</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects</p> <p>Natural England agrees</p>

<p>three original programmes in the consultation draft – Development of waste recovery and disposal infrastructure, and Intermediate waste infrastructure.</p>	<p>regional coordination and monitoring of development and supply of municipal waste facilities to meet European requirements. The programme will not itself lead to development and is not considered to be of a kind that would have negative effects on ES</p> <p><u>Intermediate waste infrastructure</u></p> <p>This programme relates primarily to RSS Policies WM5 and WM2, outlining the need for local authorities to identify the additional capacity likely to be required to manage their apportioned wastes and manufacture of products from used material.</p> <p>The programme makes provision for a type of development/service that will need to be in place at all centres of population in the region. The need and consequent location of development will be selected following consideration of options in lower tier plans and through sub-ordinate policies which are more detailed and therefore more appropriate to assess for their effects on European Site and associated sensitive areas.</p>		<p>with no LSE as this programme is concerned with investigating land requirements to accommodate the required intermediate waste infrastructure, monitoring and increasing skills in waste management planning. It is not concerned with proposing actual waste sites.</p>
--	---	--	---

	<p><u>Skills in waste management and planning</u></p> <p>The programme will not itself lead to development and is not considered to be of a kind that would have negative effects on ES.</p> <p><u>Additional Natural England comments</u></p> <p>This programme in itself will not lead to development as it is not a land use planning proposal. We do not recommend any further changes to the implementation Plan.</p>		
<p><b>6 Enterprise, business support and innovation</b></p>			

<p><b>1 Key business support products and services</b></p> <p>This incorporates three programmes from the consultation draft, set out here.</p>	<p><u>Integrated business support programme</u>  This programme primarily aims to provide support for manufacturing businesses. The programme would not in itself lead to development and is considered to be of a kind that could have no effect at all on a ES.</p> <p><u>Starting and growing a business programme</u>  This programme aims to provide support and encouragement in starting and growing businesses for business enterprises, with particular focus on Women’s enterprise. The programme would not in itself lead to development and is considered to be of a kind that could have no effect at all on a ES.</p> <p><u>Expanding provision of key business support products and services programme</u>  This programme primarily aims to provide support for manufacturing businesses. The programme would not in itself lead to development and is considered to be of a kind that could have no effect at all on a ES.</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects.</p> <p>Natural England agrees with no LSE.</p>
---	---	---	--

	<p><u>Additional Natural England comments</u> Natural England agrees with the conclusion of the HRA. We do not recommend any further changes to the Implementation Plan.</p>		
<p><b>2 Business finance</b> The Business finance programme incorporates the business finance elements of Starting and Growing a Business and the Financial support for business programme from the draft EEIP. The revised programme incorporates EEDA's new access to finance (including innovation vouchers) and 'understanding finance for business' packages..</p>	<p><u>Financial Support for Business programme</u> This programme aims to provide financial support for businesses. The programme would not in itself lead to development and is considered to be of a kind that could have no effect at all on a ES.</p> <p><u>Additional Natural England comments</u> Natural England agrees with the conclusion of the HRA. We do not recommend any further changes to the Implementation Plan</p>	No change needed to text of Implementation Plan.	<p>No likely significant effects.</p> <p>Natural England agrees with no LSE.</p>
<p><b>3 International and inter-regional trade, investment and collaboration</b> This programme was broadened in scope from the consultation draft to include investor development for domestic investors (in addition to foreign investors).</p>	<p><u>International Trade, Investment and Collaboration programme</u> This programme primarily aims to promote inward investment and export related economy. The programme would not in itself lead to development and is considered to be of a kind that could have no effect at all on a ES.</p> <p><u>Additional Natural England comments</u></p>	No change needed to text of Implementation Plan.	<p>No likely significant effects</p> <p>Natural England agrees with no LSE.</p>

	Natural England agrees with the conclusion of the HRA. We do not recommend any further changes to the Imp Plan		
<p><b>4 Strategic investments in innovation</b></p> <p>Strategic investments in innovation incorporates Knowledge Transfer and Networks, Enterprise Hubs, Third Generation Science Parks and Innovation in Key Sectors from the draft EEIP.</p>	<p><u>Third Generation Science parks</u> This programme would not in itself lead to spatially defined physical development. Its objectives are implemented through sub-ordinate policies which are more detailed and therefore more appropriate to assess for their effects on ES and associated sensitive areas. But we feel there is some uncertainty over the view which may be taken by Natural England on whether an appropriate assessment may be required.</p> <p><u>Enterprise hubs programme</u> This programme involves the creation of focussed physical and virtual facilities to provide advice, support and mentoring for knowledge-based companies. No spatial priorities are outlined for the location of enterprise hubs and they affect a physical form any related development would be implemented through sub-ordinate policies which are more detailed and therefore more appropriate to assess for their effects on ES and associated sensitive areas.</p>	<p>The programme will include businesses economic development as well as physical development. The EEIP identifies some major physical schemes that are place-specific:</p> <p><b>Open innovation science park for food, health and wellness (Unilever R&amp;D HQ, Colworth):</b> Planning permission is in place for the innovation centre and enterprise hub. Building commenced in May 2009. Wider aspirations for the science park do not currently have planning permission or are allocated in the LDF.</p> <p><b>BioScience Park (GSK,</b></p>	<p>No likely significant effects</p> <p>Natural England would agree that no further changes to the plan are required as the local examples listed in the Implementation plan are going through the planning process or have already been granted planning permission.</p>

	<p><u>Knowledge transfer and networking systems programme</u> This programme aims to improve collaboration and information sharing to promote success in business. The programme would not in itself lead to development and is considered to be of a kind that could have no effect at all on a ES.</p> <p><u>Investment in key sectors</u> The programme aims to support innovation within energy use and production fields in order to increase resource efficiency and reduce greenhouse gas emissions in line with national strategies. The programme would not in itself lead to development and is considered to be of a kind that could have no effect at all on a ES.</p> <p><u>Additional Natural England comments</u> All other proposals either have planning permission or are outlined in the relevant LDF. These would therefore be subject to HRA through the planning process.</p>	<p><b>Stevenage):</b> Planning Permission Granted, building to start in 2009, complete 2011, project delivery end date: 2013. Planning consent for junction improvements and an additional 60,000 sq m of space.</p> <p><b>Innovation Martlesham (BT):</b> Appears in the Haven Gateway IDP.</p> <p>Policies E3, E4 and HG2 of the East of England Plan support the strategic growth of the ICT cluster. Paragraph 13.30 of the Plan goes further referring to the “Innovation Centre”.</p> <p>Planning application and supporting EIA submitted for redevelopment of part of the site and 2000 homes.</p>	
--	---	--	--

		<p>The further development forms part of the preferred options under policy SP21 (Martlesham Heath Business Campus, including Adastral Park). The Appropriate Assessment carried out for Suffolk Coastal concluded that this policy will “have no adverse affect upon the integrity of any European sites”.</p> <p>Building due to be completed in 2014, project delivery end date: 2014.</p> <p><b>Norwich Research Park:</b></p> <p>Policy 5 (see paragraph 5.38) of the draft Joint Core Strategy (a key document in the LDF) for Broadland Norwich and South Norfolk supports growth at NRP. This in turn derives from policies E1-6 in the East of</p>	
--	--	---	--

		<p>England Plan and the RES Innovation goal.</p> <p><b>Expansion of the Cambridge Cluster through the West of Cambridge development (incorporating the Hauser Forum, and the Cambridge Biomedical Campus at Addenbrookes):</b></p> <p>The West Cambridge development accords with the Cambridge Local Plan. The Planning Approval includes provision for periodic reviews of the Plan without the need for a new Planning Application. The West Cambridge Master Plan was reviewed in 2003 and Cambridge City Council approved all the proposals contained in the review in May 2004.</p>	
--	--	---	--

		No change needed to text of Implementation Plan.	
<p><b>ICT and the workplace</b>  ICT and the workplace comprises Business ICT Engagement, ICT and flexible working and Regional ICT skills, originally in the draft Utilities theme.</p>	<p><u>Business ICT engagement</u>  This programme aims to research into and provide support for the use of ICT in businesses (particularly SMEs). They will not in themselves lead to development and are not considered to be of a kind that would have negative effects on ES.</p> <p><u>ICT for flexible working</u>  This programme aims to increase flexible working in the public, private and third sectors. The programme will not itself lead to development and is not considered to be of a kind that would have negative effects on ES.</p> <p><u>Regional ICT skills</u>  The programme would not in itself lead to development and is considered to be of a kind that could have no effect at all on a ES.</p> <p><u>Additional Natural England comments</u>  Natural England agrees with the conclusion of the HRA. We do not recommend any further changes to the Implementation Plan.</p>	No change needed to text of Implementation Plan.	<p>No likely significant effects.</p> <p>Natural England agrees with no LSE conclusion.</p>

<b>Skills and employability</b>			
<p><b>Leadership and High-Level Skills</b></p>	<p>This programme focuses upon higher education facilities and high quality housing and employment opportunities for graduates. Any development related to such provisions would be implemented through sub-ordinate policies which are more detailed and therefore more appropriate to assess for their effects on ES. The programme is not considered to have any effects that would impact upon a ES.</p> <p><u>Additional Natural England comments</u> Natural England agrees with the conclusion of the HRA. We do not recommend any further changes to the Implementation Plan.</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects</p> <p>Natural England agrees with no LSE.</p>
<p><b>Skills for Business</b> <b>2 original programmes from the consultation draft are incorporated in this programme.</b></p>	<p><u>A demand-led skills system</u> No spatial, development or environment related activities are proposed within this programme. The programme is not considered to have any effects that would impact upon a ES.</p> <p><u>Skills for key sectors and clusters</u> No spatial, development or environment related activities are proposed within this programme. The programme is not</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects</p> <p>Natural England agrees with no LSE.</p>

	<p>considered to have any effects that would impact upon a ES.</p> <p><u>Additional Natural England comments</u> Natural England agrees with the conclusion of the HRA. We do not recommend any further changes to the Implementation Plan.</p>		
<b>Integrated Employability Offer</b>	<p><u>An integrated employment, skills and economic participation offer</u> The programme aims to raise participation levels in employment, education and training and will not itself directly lead to development or have any effects that would impact upon a ES.</p> <p><u>Creating an environment for a thriving third sector</u> The programme aims to support social enterprise/third sector organisations and improve their access to public sector procurement. The programme will not itself directly lead to development or have any effects that would impact upon a ES.</p> <p><u>The role of migrant workers in the East of England economy</u> This programme aims to maximise and promote the benefit from migrant worker skills and employment in the East of</p>	No change needed to text of Implementation Plan.	<p>No likely significant effects</p> <p>Natural England agrees with no LSE.</p>

	<p>England. The programme will not itself directly lead to development or have any effects that would impact upon a ES.</p> <p><u>Additional Natural England comments</u> Natural England agrees with the conclusion of the HRA. We do not recommend any further changes to the Implementation Plan.</p>		
<b>Culture, creativity and the visitor economy</b>			
<p><b>Supporting creative and cultural industries</b></p> <p>This programme incorporates two original programmes from the consultation draft set out here.</p>	<p><u>Delivering growth in the region's cultural and creative economy.</u></p> <p>This programme is focussed primarily upon markets, products and services, with a region-wide remit. Strategically targeted Creative Economy Hubs (if requiring physical development), would be located following consideration of options in lower tier plans (development plan documents). See also RSS Policy C2.</p> <p>The programme is not considered to have any effects that would impact upon an ES.</p> <p><u>Developing skills and creativity for life</u></p> <p>This programme is focussed upon</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects</p> <p>Natural England agrees with no LSE.</p>

	<p>improving communication networks and opportunities for skill and knowledge development across the region. The programme is not considered to have any effects that would impact upon a ES.</p> <p><u>Additional Natural England comments</u> Natural England agrees with the conclusion of the HRA. We do not recommend any further changes to the Implementation Plan.</p>		
<p><b>Creative places and communities</b></p> <p>In the final Implementation Plan, reference is made to supporting Norwich's bid for UNESCO City of Literature and Peterborough's plan to be Environment City. Supporting Norwich, Ipswich/Haven Gateway and Southend's ambitions around culture and sport.</p>	<p><u>Creative places and sustainable communities.</u></p> <p>RSS Policies SS3/C1/C2 outline the need to comply with Policy ENV3 in not impacting ES through development in and around KCDCs, The Lee Valley Regional Park and through wider provision of strategic cultural, sport and tourism facilities.</p> <p>Anthropogenic pressures will therefore be considered at strategic level and facilities for increased tourism implemented through sub-ordinate policies which are more detailed and therefore more appropriate to assess for their effects on ES and associated</p>	<p>The changes made to the programme in the final Implementation Plan will not in itself lead to any development as it is not a land use planning proposal.</p> <p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects Natural England agrees with no LSE.</p>

	<p>sensitive areas.</p> <p><u>Additional Natural England comments</u>  Natural England agrees with the conclusion of the HRA. We do not recommend any further changes to the Implementation Plan.</p>		
<p><b>Growing and sustaining the tourism visitor economy</b></p> <p>This programme incorporates the original visitor economy programme, and elements of the promoting the region through culture programme.</p>	<p><u>Growing and sustaining the visitor economy.</u></p> <p>RSS Policies SS3/C1/C2 outline the need to comply with Policy ENV3 in not impacting ES through development in and around KCDCs, The Lee Valley Regional Park and through wider provision of strategic cultural, sport and tourism facilities.</p> <p>Policy E7 states that tourism development must not have adverse impacts on the integrity of ES and “...should be fully sustainable in terms of their impacts on ... both natural and built environments...”.</p> <p>Anthropogenic pressures will therefore be considered at strategic level and facilities for increased tourism implemented through sub-ordinate policies which are more detailed and</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects  Natural England agrees with no LSE.</p>

	<p>therefore more appropriate to assess for their effects on European Site and associated sensitive areas.</p> <p><u>Promoting the Region through culture.</u></p> <p>Programme focussed at advertising/increasing awareness of natural assets. Potential positive associated impacts from increased publicity/funding, negative impacts from increased anthropogenic pressures on ES. RSS Policy E7 states that tourism development must not have adverse impacts on the integrity of ES and "...should be fully sustainable in terms of their impacts on ... both natural and built environments...".</p> <p>Anthropogenic pressures will therefore be considered at strategic level and facilities for increased tourism implemented through sub-ordinate policies which are more detailed and therefore more appropriate to assess for their effects on European Site and associated sensitive areas.</p>		
--	---	--	--

	<p><u>Additional Natural England comments</u> Natural England agrees with the conclusion of the HRA. We do not recommend any further changes to the Implementation Plan.</p>		
<p><b>The London 2012 Olympics and Paralympic Games</b></p> <p>This programme incorporates the Olympics programme, formerly in the Enterprise theme, along with elements of the Tourism visitor economy programme.</p> <p>In the final Implementation Plan, reference is made to Broxbourne white water canoe course and Hadleigh farm mountain biking course</p>	<p><u>Olympics Programme (formerly in Enterprise theme)</u></p> <p>This programme aims to improve communication and support for businesses in order to maximise economic benefits (particularly for SMEs) of the Olympic games and beyond. The programme would not in itself lead to development and is considered to be of a kind that could have no effect at all on a ES.</p> <p><u>Additional Natural England comments</u> Natural England agrees with the conclusion of the HRA. We do not recommend any further changes to the Implementation Plan.</p>	<p>Broxbourne white water canoe course has already received planning permission. Hadleigh farm mountain biking course is currently undergoing appropriate environmental assessment.</p> <p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects.</p> <p>Natural England agrees with no LSE conclusion.</p>
<p><b>Green Infrastructure, Heritage, Flood Risk and Coastal Environments</b></p>			
<p><b>Flood and erosion risk management</b></p>	<p><u>Flood and Coastal Risk Management (current)</u> This programme is concerned with the management of flood risk and coastal</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects</p> <p>Natural England agrees</p>

	<p>erosion. It relates to the delivery of RSS Policies SS9, WAT3 and WAT4. It seeks to ensure local authorities/local development documents protect existing and planned infrastructure and take account of the environmental consequences of integrated water/flood management. Key components include, maintaining defences where it is in line with the Environment Agency's plans and protection of environmentally sensitive habitats from flood risks.</p> <p>It is considered that the programme would not negatively impact upon a ES as no development could occur through this programme alone. Its objectives are implemented through subordinate policies which are more detailed and therefore more appropriate to assess for their effects on ES and associated sensitive areas.</p> <p><u>Flood and Coastal Risk Management (future)</u></p> <p>This programme is concerned with the management of flood risk and coastal erosion. It relates to the delivery of RSS Policies SS9, WAT3 and WAT4. It seeks to ensure local authorities/local</p>		<p>with no LSE conclusion as the programme relates to RSS policies SS9, WAT 3 and WAT 4 which have been subject to a HRA. Also this programme itself will not lead to any actual development. Any hard infrastructure requirements will be subject to the planning process in lower tier plans.</p>
--	---	--	---

	<p>development documents protect existing and planned infrastructure and take account of the environmental consequences of integrated water/flood management.</p> <p>Key components include, maintaining defences where it is in line with the Environment Agency's plans/CFMPs/SMPs/FCRMs and protection of environmentally sensitive habitats from flood risks.</p> <p>It is considered that the programme would not negatively impact upon a ES as no development could occur through this programme alone. Its objectives are implemented through subordinate policies which are more detailed and therefore more appropriate to assess for their effects on ES and associated sensitive areas.</p> <p><u>Flood Risk and Climate Change adaptation</u></p> <p>This programme relates to the delivery of RSS Policies SS9, WAT3 and WAT4. Its expected outcomes include, facilitating the process of planning for the adaptation of freshwater habitats liable to inundation. It is considered that the programme</p>		
--	--	--	--

	would not negatively impact upon a ES as no development could occur through programme alone. Its objectives are implemented through sub-ordinate policies which are more detailed and therefore more appropriate to assess for their effects on ES and associated sensitive areas.		
<b>Integrated coastal management</b>	<p><u>Integrated Coastal Management</u> This programme relates to the delivery of RSS Policies SS9, WAT3 and WAT4. This Programme will develop and deliver integrated action plans. It is considered that the programme would not negatively impact upon a ES as no spatial development would result as a result of this programme alone. Its objectives are implemented through sub-ordinate policies which are more detailed and therefore more appropriate to assess for their effects on ES and associated sensitive areas.</p> <p><u>Additional Natural England comments</u> Natural England supports the Regional Habitat Creation elements of the programme.</p>	No change needed to text of Implementation Plan.	<p>No likely significant effects.</p> <p>Natural England agrees with no LSE conclusion.</p>
<b>The natural and historic environment</b>	<u>Understand the role of the historic and natural environment in relation to</u>	Policy ENV1 of the East	No likely significant effects

<p>Text was added to the final Implementation Plan to refer to implementation of the region's 12 priority large scale projects: Blackwater Estuary, Brecks Biodiversity Project, Blythe to Alde, Great Fen project, Green Arc, Greensand Ridge, Norfolk and Suffolk Broads, Marston Vale Community Forest, Thames Estuary, Thames Chase Community forest, Wallasea, Wicken Fen Vision</p>	<p><u>RES/RSS outcomes and impacts.</u>  It is considered that this programme is likely to help conserve, enhance and protect the natural environment, including biodiversity, through the provision of an evidence base highlighting sensitive areas, environmental limits and ecosystem services.  No development could occur through this policy or proposal alone. It will serve to inform sustainable development and planning. It is considered that the programme would not negatively impact upon a ES.</p> <p><u>Regionally significant landscapes, habitats and Green infrastructure</u>  The aim of this programme is to support and invest in the management of natural assets in the region including high quality landscapes and iconic species in order to deliver RSS Policy ENV2 and raise the profile of the region. The programme will help to protect the natural environment, including biodiversity.  This programme is considered likely to have a positive impact upon ES.</p> <p><u>Restoring habitats consistent with</u></p>	<p>of England Plan refers to the Broads, Thames Chase and Marston Vale forests, Wicken Fen and Great Fen.</p> <p>These projects reflect the need for habitat creation and restoration, as well as better management of sites, such as the Blackwater Estuary, to avoid adverse impact.</p> <p>No change needed to text of Implementation Plan.</p>	<p>Natural England agrees with no LSE.</p>
---	---	--	--

	<p><u>biodiversity action plan (BAP) targets.</u>  This programme aims to protect and enhance the natural environment with specific reference to conserving biodiversity through habitat restoration. This programme is considered likely to have an overall positive impact upon ES.</p> <p><u>Additional Natural England comments</u>  This programme is concerned with enhancing the natural environment and will therefore have a positive effect on N2K sites.</p>		
<p><b>Delivering green infrastructure</b></p>	<p><u>Maintaining the distinctiveness and improving the quality of urban places in the East of England</u>  This programme is intended to enhance existing and future urban environments, through measures which include the establishment and protection of a network of urban greenspaces. These measures will enhance the natural environment, including biodiversity and would not be likely to have an adverse effect on ES and associated sensitive areas. There is the potential for positive impacts upon ES through the implementation of this programme.</p> <p><u>Sustaining Investment in Green</u></p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects</p> <p>This programme is concerned with enhancing the natural environment and will therefore have a positive effect on N2K sites. Natural England agrees with no LSE.</p>

	<p><u>Infrastructure</u> This programme is intended to conserve and enhance the natural environment through the provision of sustained funding for green infrastructure planning and delivery.</p> <p>RSS Policy ENV1, states that local development documents should ensure protection of ES. These enhancement measures will not be likely to have any negative effect on a European Site.</p>		
--	--	--	--

### Sub-regional priorities

<b>Bedford</b>			
<b>Priority</b>	<b>HRA: Screening comments, with Natural England's comments where appropriate</b>	<b>EEDA/EERA response</b>	<b>Likely significant effects</b>
Secure a significantly higher rate of <b>housing delivery, principally through the implementation of existing housing allocations and commitments</b> , whilst ensuring greater quality.	No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.	No change needed to text of Implementation Plan.	No likely significant effects. Natural England agrees with the no LSE conclusion as this priority is aimed at increasing housing delivery of existing housing allocations, it is not

			promoting a net increase in the total number of houses. The priority will also be delivering Policy H1 of the RSS which has already been subject to a HRA.
A significant increase in employment, especially in offices and high-value knowledge-based industries and <b>focusing on key sectors of likely future demand including automotive and aerospace research and development and health.</b>	This policy itself does not specifically prescribe physical development or spatial contexts. Further, any development relating to achieving this policy would be implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.	No change needed to text of Implementation Plan.	No likely significant effects. Natural England agrees with the no LSE conclusion.
Developing cultural and heritage focused tourism in Bedford through <b>enhanced facilities and new attractions including Center Parks and NIRAH.</b>	No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas. However, policy is highly location specific. NE to comment please. There are no ES within 5km of Centre Parks site at Warren Wood, Millbrook or within 5km of proposed NIRAH site, Quest Clay Pit, Stewartby and therefore no Appropriate Assessment is required at	The Secretary of State approved centre parcs Warren Wood in 2007. NIRAH was granted outline permission in September 2009.  The core strategy for the North area of Central Bedfordshire (adopted November 2009) also promotes Tourism and refers to these two sites.	No likely significant effects  Natural England agrees with no LSE conclusion as NIRAH already has outline planning permission and the relevant core strategy identifies the site, any impacts will therefore have been dealt with and considered via the Plan appraisal process.

	<p>this stage.</p> <p><u>Additional Natural England comments</u>  The main point would be that the report correctly states that there are no ES in the county, however, there are several within easy travelling distance – e.g. Portholme, Upper Nene Valley Gravel Pits and Chiltern Beechwoods. I'd highlight that the report seems to discount ES if they are more than 5km away from the proposed centres of new development, and I would question whether this is a large enough area of search, especially when it comes to assessing potential impacts of increased visitor pressure and impacts to water quality/quantity.</p>	<p>Policy E6 of the RSS seeks to avoid impact on wildlife sites but is clear that tourism should be encouraged.</p>	
<p>Achieve a renaissance of Bedford town centre. Promote the town centre key areas of change sites identified in the emerging area action plan such as the <b>Station Quarter, Town Centre West and Riverside Square.</b></p>	<p>The policy will not itself lead to development and is considered to be of a kind that would not lead to any adverse effects on ES and associated sensitive areas.</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects.  Natural England agrees with the no LSE conclusion.</p>
<p>Achieve the environmental</p>	<p>No development could occur through this</p>	<p>No change needed to</p>	<p>No likely significant effects</p>

<p>regeneration of the northern Marston Vale, in conjunction with the <b>Forest of Marston Vale as a key element of sub-regional green infrastructure.</b></p>	<p>policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas. There are no ES within 5km of Marston Vale, between Marston, Moretaine and Stewartby and therefore no Appropriate Assessment is required at this stage.</p> <p><u>Additional Natural England comments</u> Agree.</p>	<p>text of Implementation Plan.</p>	<p>Natural England agrees with the no LSE conclusion.</p>
<p>Continue to improve infrastructure connections between Bedford and other sub-regional centres, as well as the links to the strategic road and rail networks through <b>key schemes such as the A428/A6 link, Wixhams Station and upgrade of Bedford Station.</b></p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p>	<p>The link road is one component of the western bypass for Bedford featured in the adopted core strategies for Bedford and Central Bedfordshire (North).</p> <p>The A428 to A6 section formed part of residential development proposals north of Bromham Road. This development has planning consent (subject to completing legal agreements).</p>	<p>No likely significant effects</p> <p>Natural England agrees with the no LSE conclusion as the priority has already been appraised through the planning process of lower tier plans.</p>

		The Wixhams Station is Included in table 4 within Appendix A of the East of England Plan. It also features in the Core Strategy for the northern part of Central Bedfordshire.	
<b>Realise the role of Cranfield University and the University of Bedfordshire</b> in addressing the below average skills issues in Bedford and supporting and developing the emerging business sectors as set out.	The policy will not itself lead to development and is considered to be of a kind that would not lead to any adverse effects on ES and associated sensitive areas.  <u>Additional Natural England comments</u> Agree	No change needed to text of Implementation Plan.	No likely significant effects. Natural England agrees with no LSE conclusion.

<b>Greater Cambridge</b>			
<b>Priority</b>	<b>HRA: Screening comments, with Natural England's comments where appropriate</b>	<b>EEDA/EERA response</b>	<b>Likely significant effects</b>
Overcome shortages of affordable housing. <b>Major schemes are focused at Northstowe, Southern Fringe, Cambridge North West, Cambridge East and the</b>	No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.	No change needed to text of Implementation Plan.	No likely significant effects.  Natural England agrees with no LSE conclusion. This priority is delivering

<p><b>Northern Fringe</b> and all include significant infrastructure inputs.</p>			<p>Policy H1 and H2 of the RSS which has already been subject to a HRA.</p>
<p>Address the major transport infrastructure deficit. In particular <b>furthering the feasibility</b> of, major schemes such as the <b>A14 and A428 Caxton to St Neots and Haverhill Sustainable Transport Link alongside a programme of transport works under the Transport Innovation Fund (TIF)</b> to include segregated busways, park and ride, city centre improvements.</p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas. There are no ES designations within 5km of A428, Caxton to St Neots. No AA is required because programmes have been covered by the HRA undertaken for the RSS</p>	<p>The A14 improvements, such as Ellington to Fen Ditton, are programmed by the Highways Agency and included in the East of England Plan.</p> <p>Improvements to the A428 between Caxton and the A1 (St. Neots) was included in the Cambridgeshire 2003 Structure Plan.</p> <p>However, the project does not appear in the East of England Plan. Suggest rewording to include feasibility.</p> <p>Haverhill Sustainable Transport Link will be needed as part of its strategic growth (St. Eds submission policy CS12).</p>	<p>No likely significant effects</p> <p>Natural England agrees with the no LSE conclusion provided the suggested re wording is included in the final Plan.</p>

Health infrastructure investment. <b>Support for a private finance initiative relative to Addenbrooke’s 2020 programme and Hinchingsbrooke.</b>	<p>The policy will not itself lead to development and is considered to be of a kind that would not lead to any adverse effects on ES and associated sensitive areas.</p> <p><u>Additional Natural England comments</u> Agree.</p>	No change needed to text of Implementation Plan.	No likely significant effects Natural England agrees with the no LSE conclusion.
<p>Develop a stronger <b>creative quarter in Cambridge and harness the potential of the area to be a leader in the interface between the arts, media and new technologies. A new international conference venue.</b></p> <p><b>Clean-tech, ICT and life sciences support and start-up. Development of the Cambridge Bio-Medical Campus, Haverhill Technology Park and working with the University of East Anglia to create a low</b></p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p> <p>Cambridge Biomedical Campus – no ES designations within 5km Haverhill Business Park – no ES designations within 5km University of East Anglia 1 SAC (River Wensum) within 5km. Should an application for this be forthcoming then the site is likely to require an HRA.</p> <p><u>Additional Natural England comments</u></p>	<p>The incubator may be within an existing building, or as one already planned. A location is not specified and would be assessed through existing policies which protect such areas.</p> <p>The Implementation Plan will be reworded to say “...<i>working with the university of East Anglia to look into the feasibility of a low carbon creative industries incubator</i>”</p>	<p>No likely significant effects, with wording changes.</p> <p>Natural England agrees with no LSE conclusion provided the suggested wording is incorporated into the final Implementation Plan.</p>

<p><b>carbon creative industries incubator.</b></p>	<p>Agree that Impl plan should be reworded to say “...<i>working with the university of East Anglia to look into the feasibility of a low carbon creative industries incubator</i>”</p>		
<p><b>Diversification and regeneration of town centres.</b> Diversify and improve performance whilst preserving the distinctiveness of the sub-region’s market towns in Ely, Royston, Haverhill, Newmarket (including horseracing), St Neots and Huntingdon to enable them to serve the sub-region effectively.</p>	<p>This policy itself does not specifically prescribe physical development. Any development relating to achieving this policy would be implemented through sub-ordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas</p> <p><u>Additional Natural England comments</u> Agree</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects Natural England agrees with the no LSE conclusion.</p>
<p>Green infrastructure improvements through new developments but also specifically through the <b>continued support for the Great Fen Project and the Wicken Fen Vision</b> and the implementation of the Green Infrastructure Strategy.</p>	<p>The policy is intended to protect and enhance the natural environment, including biodiversity and areas of important wildlife habitats, and will not be likely to have any adverse effect on a European Site.</p> <p><u>Additional Natural England comments</u> Natural England supports this programme.</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects Natural England agrees with the no LSE conclusion.</p>
<p><b>Develop comprehensive</b></p>	<p>The policy will not itself lead to physical</p>	<p>No change needed to</p>	<p>No likely significant effects</p>

<p><b>support packages for emerging clusters</b> such as plastronics, display technologies, bio-informatics, semi-conductor design and environmental technologies. This will include SmartLIFE, Citi-Life, Greater Cambridge Environmental Technology Network, Low Carbon Creative Industries Cluster and Open Innovation at the Hauser Forum.</p>	<p>development and is considered to be of a kind that would not lead to any adverse effects on ES and associated sensitive areas.</p> <p><u>Additional Natural England comments</u> Agree</p>	<p>text of Implementation Plan.</p>	<p>Natural England agrees with the no LSE conclusion.</p>
<p>To deepen the local and regional impact of the universities and regional colleges. <b>Support the expansion and growth of Anglia Ruskin University</b> in specialist research, creative and technical areas. <b>Major developments /expansions of Huntingdonshire Regional College, College of West Anglia, University of Cambridge, Cambridge Regional College and Cambridge East ICT college.</b></p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas. NE to comment NB: Anglia Ruskin University – 1 Ramsar site (THE WASH), 1 SPA (THE WASH) and 1 SAC (THE WASH &amp; NORTH NORFOLK COAST) within 5km Huntingdonshire Regional College – 1 SAC (PORTHOLME) within 5km College of West Anglia - 1 Ramsar site (THE WASH), 1 SPA (THE WASH) and 1 SAC (THE WASH &amp; NORTH NORFOLK</p>	<p>Anglia Ruskin University and College of West Anglia</p> <p>Policy CS03 of KLWM’s submission core strategy includes reference to the development of “a major new educational enterprise campus” that will include Anglia Ruskin</p> <p>The re-development of the Anglia Ruskin’s Cambridge site is underway.</p>	<p>No likely significant effects</p> <p>Given the clarification given by EERA and EEDA on the status of the proposed growth and expansion of the universities / colleges we can now agree no LSE as the impacts of these proposals will have been considered or are being considered in lower tier plans.</p>

	<p>COAST) within 5km  Cambridge Regional College – no designations within 5km  Cambridge East ICT College – no designations within 5km  An HRA was not undertaken of the RES and this has introduced a spatial dimension which could impact on two SACs. This is site specific on locations which are in proximity to ES.</p> <p><u>Additional Natural England comments</u></p> <p>The Imp plan should be reworded given physical proximity to SACs so it is explicit as to whether expansion and growth is physical growth and expansion or virtual growth and expansion (i.e by increasing student numbers, courses or funding) . It would not be possible to conclude no LSE given current wording.</p>	<p>Huntingdonshire Regional College</p> <p>The relocation of the college has received planning permission but not implemented.</p> <p>The developments and expansions have either been permitted or are within core strategies.</p>	
--	--	---	--

<b>Greater Norwich</b>			
<b>Priority</b>	<b>HRA: Screening comments, with Natural England’s comments where appropriate</b>	<b>EEDA/EERA response</b>	<b>Likely significant effects</b>
To become a leading <b>Science City</b> with further expansion of <b>Norwich Research Park and</b>	No development could occur through this policy alone, because it is implemented through subordinate policies which are	Specific reference to Hethel and NRP and University of East Anglia	No likely significant effects

<p><b>the western quadrant</b> and the opportunities of bio-technology, food and health research and development.</p>	<p>more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.  1 SAC (RIVER WENSUM) within 5km of NRP.  There is also 1 SAC (NORFOLK VALLEY FENS) within 5km of Hethel  Cannot define boundaries of Western Quadrant.  A HRA was not undertaken of the RES and this has introduced a spatial dimension which could impact on two SACs. Opinion will be sought from NE.</p> <p><u>Additional Natural England comments</u>  Could the Impl Plan be reworded to say “with further investment in the Norwich research Park.....” ?</p>	<p>has been removed from the Implementation Plan</p> <p>The further expansion of the research park was included in South Norfolk’s Local Plan of 2003. A more detailed supplementary planning document was adopted in March 2009.</p> <p>In addition, Policy NR1 of the East of England Plan refers to the expansion of the research park (Colney/Cringleford).</p> <p>The priority reflects established policy.</p>	<p>Given the further clarifications provided by EERA and EEDA on the status of the expansion of the Norwich Research Park and Western Quadrant Natural England can agree with the no LSE conclusion as the priority is delivering adopted plan policies.</p>
<p>Substantial <b>city centre regeneration</b> with housing and employment growth, in particular in media, creative, finance, insurance and cultural sectors. This growth needs to be accompanied by continued improvement of the public realm.</p>	<p>The policy makes provision for types of development and indicates a broad location, but the location of development is to be selected following consideration of options in lower tier plans (development plan documents).  Therefore, no development could occur through this policy alone, because it is implemented through sub-ordinate</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects</p> <p>Natural England agrees with the no LSE conclusion.</p>

	<p>policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p> <p><u>Additional Natural England comments</u> Agree with HRA comments.</p>		
<p>Developing the <b>north-east quadrant</b> as a sustainable major urban extension of over 10,000 new homes, 5,000 new jobs and with excellent accessibility to the city centre. This development will require the completion of the <b>Norwich Northern Distributor Road</b>, which will also bring considerable economic and transport benefits across the sub-region and meet existing transport needs.</p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas. Although the route of the proposed trunk road still uncertain this transport programme has been covered by the HRA undertaken for the RSS</p> <p><u>Additional Natural England comments</u> <b>Initial comments</b> The discussion of the Greater Norwich Growth Point needs to consider the Broadland SPA and Ramsar, and the Broads SAC, as well as the River Wensum and Norfolk Valley Fens SAC, because of impacts on water quality and availability.</p> <p>Also – why is there no mention of green infrastructure under this head? There are</p>	<p><b>Initial response</b> The level of growth, including the north Norwich distributor road is part of the RSS. RPS considered the impact on water less significant than recreation and then the conclusion was no effect on integrity.</p> <p>Green infrastructure was not raised as a priority by sub-regional partners. It would be part of the development of the north-east quadrant for example.</p> <p>The development of the North East Quadrant is included in the submission core strategy</p>	<p>No likely significant effects, with addition of footnote.</p> <p>Natural England has agreed with this approach.</p>

	<p>a number of projects already in train in Norwich and it is even more critical here than in Thetford or King's Lynn as the predicted growth is so much greater. Need clarification that the development of the North East Quadrant is covered by the relevant Local Plan.</p> <p><b>Supplementary comments</b>  Natural England cannot currently agree with the no LSE conclusion as this relates to the Norwich Northern Distributor Road. The funding for this scheme is still uncertain as the NNDR is listed in the RSS as schemes identified in the Regional Funding Allocation - but yet to be approved. There would be potential impacts on the River Wensum SAC if the NNDR were to go ahead. We would therefore advise that the text relating to the road needs to be reworded as it currently doesn't mention the need to consider environmental issues. The wording here is stronger than what is contained in the RSS.</p> <p>Issues relating to the north-east quadrant have been addressed.</p> <p>Are there any implications for growth re</p>	<p>of the Greater Norwich Partnership.</p> <p>The priority is reflecting the locational choices which have been subject to an appropriate assessment (Aug 2009).</p> <p><b>Supplementary response</b>  The NNDR is included in table 4, appendix A of the East of England Plan. Furthermore, submitted policy includes the route of the NNDR and refers to economic and transport benefits.</p> <p>A stage two AA on this route is underway and there is the potential for in combination effects. Mitigation has been identified the latest (Feb 2010) assessment states:</p>	
--	---	--	--

	<p>water cycle study??</p>	<p>“land parcels between the NDR and the River Wensum are allocated as ecological buffer zones within which no significant development is permitted”</p> <p>The priority does provide further detail than regional policy but goes no further than locally determined policy which has been assessed for impacts.</p> <p>Funding secured for part of the route, although not relevant to impact on sites.</p> <p>The implication of the water cycle study has not altered regional (or even national) growth policies.</p> <p>A footnote will be added to the Implementation</p>	
--	----------------------------	--	--

		<p>Plan to clarify this position: “The feasibility for part of the NNDR has been confirmed. The remaining section, including the possibility for the route to require mitigation to habitats along the River Wensum, is still being determined through the local planning process.”</p>	
<p>Major transport improvements including road improvements <b>(A11 five ways to Thetford, A47 and A14), enhancements to rail services with improved journey times and reliability to London, improved east-west links and new stations</b> associated with growth in the north-east quadrant. Enhance the potential of Norwich airport, including links to Amsterdam Schipol.</p>	<p>The policy makes provision for types of development and indicates broad locations, but the location of development is to be selected following consideration of options in lower tier plans (development plan documents). Therefore, no development could occur through this policy alone, because it is implemented through sub-ordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas. Whilst these programmes are very spatially specific. These transport programmes have been covered by the HRA undertaken for the RSS.</p>	<p>Source is Policy T15 in RSS</p> <p>These transport programmes have been covered by the HRA undertaken for the RSS.</p> <p>Five Ways to Thetford - RPS (para. 4.225). “No specific proposals are promoted by the RSS, and any such potential effects would be assessed through the consenting processes specifically relevant to such infrastructure</p>	<p>No likely significant effects</p> <p>Natural England agrees with the no LSE conclusion as the schemes are covered by the RSS and would also be subject to the consenting / appraisal processes required for road scheme enhancements.</p>

	<p><u>Additional Natural England comments</u> A11 Fiveways to Thetford is covered by the RSS under “Schemes currently programmed for delivery”</p> <p>Please confirm status of A47 and A14.</p>	<p>developments.”</p> <p>The A47 and A14 are connected by the A11. The Five Ways junction serves these roads as well as Thetford.</p>	
<p>Ensuring that growth helps <b>tackle the severe deprivation</b> in many parts of the city. Growth needs to be matched with <b>continued focus on skills and capacity building in those areas and communities together with physical regeneration in priority estates.</b></p>	<p>This policy focuses upon the regeneration of deprived communities through the provision of services, support and opportunities. One element of this is physical regeneration, in the broad spatial context of areas considered to be priority estates. No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p> <p><u>Additional Natural England comments</u> Agree</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects</p> <p>Natural England agrees with the no LSE conclusion.</p>

<b>Greater Peterborough</b>			
<b>Priority</b>	<b>HRA: Screening comments, with Natural England’s comments where appropriate</b>	<b>EEDA/EERA response</b>	<b>Likely significant effects</b>
Maximising the potential of	No development could occur through this	No change needed to	No likely significant effects

<p>Peterborough's <b>Environment City status and its ambition to be the UK's overall 'environment capital'</b> in its regeneration and growth. This will build on the carbon challenge and associated South Bank development to create an 'eco-quarter', including the expansion of environmental technologies and eco innovation (such as renewable and decentralised energy generation and zero carbon technologies).</p>	<p>policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p> <p><u>Additional Natural England comments</u> Agree</p>	<p>text of Implementation Plan.</p>	<p>Natural England agrees with the no LSE conclusion.</p>
<p>In order to restore and enhance its economic significance and reputation, a key priority is <b>city centre regeneration</b> incorporating exemplar zero carbon development, university presence and maximising major retail, employment and housing potential via developments such as the Station Quarter. Such regeneration will require a transformation of public realm and the creation of attractive</p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p> <p>It is noted that within 5km of the main stations there is 1 Ramsar site (NENE WASHES), 1 SPA (NENE WASHES) and 2 SACs (NENE WASHES and ORTON PIT) that may require consideration in these policies.</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects. Natural England agrees with no LSE conclusion.</p>

and distinctive public spaces.			
<p><b>Development of key innovation and business clusters</b> including environment technologies but also focusing on other strengths such as financial services, culture and knowledge employment.</p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p> <p><u>Additional Natural England comments</u> Agree</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects Natural England agrees with the no LSE conclusion.</p>
<p>The development of a major logistics centre of regional/national significance at an '<b>inland port</b>' at Magna Park, which would itself require key transport improvements such as the Felixstowe to Nuneaton rail upgrade.</p>	<p>This policy makes provision for a type of development and indicates a broad location, but the nature and location of development is to be selected following consideration of options in lower tier plans (development plan documents). No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p> <p>This transport programme has been covered by the HRA undertaken for the RSS.</p>	<p>Specific reference to Magna Park will be removed from the final Implementation Plan, and wording amended to include 'investigate options'</p> <p>Felixstowe to Nuneaton is in RSS</p> <p>While the Peterborough's core strategy does support this proposal, it is qualified by the need for a project level HRA.</p>	<p>No likely significant effects, with wording changes.</p> <p>Natural England agrees with the no LSE conclusion provided that the wording is changed as outlined in our previous comments.</p>

	<p><u>Additional Natural England comments</u> Need to remove direct reference to Magna park. Also suggest rewording of Impl Plan to “Investigate the options for developing a logistics centre of regional / national significance at an inland port”. – cannot currently conclude no LSE with current wording due to proximity to Nene Washes SPA/SAC</p>		
<p>Development of a <b>university</b> in the city together with improvements to <b>further education and training</b> opportunities to help tackle skills capacity and deprivation constraints and to provide a local university option for a large catchment area without one.</p>	<p>This policy itself does not specifically prescribe physical development. Any development relating to achieving this policy would be implemented through sub-ordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas</p> <p><u>Additional Natural England comments</u> Agree</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects Natural England agrees with the no LSE conclusion.</p>
<p><b>Regeneration of the former new town neighbourhood centres</b> together with replacing/upgrading of substandard and outdated utilities and infrastructure.</p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects Natural England agrees with the no LSE conclusion.</p>

Great Yarmouth and Lowestoft			
Priority	HRA: Screening comments, with	EEDA/EERA response	Likely significant effects

	<b>Natural England's comments where appropriate</b>		
<p>Given the peripheral location of the two towns and their specific estuarial geography, the key priorities are for <b>major transport improvements</b>. These include a further road river crossing in each of the towns (of particular and immediate importance to Great Yarmouth and EastPort), major improvements to the A47, including the A47/A12 junction, the electrification of the railway line to Norwich and line improvements to Ipswich. These improvements are seen as critical to the success of the other sub-regional priorities.</p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p> <p>Within 5km of A47/A12 Junction and along the A47 outside of Great Yarmouth, there is 1 Ramsar site (BREYDON WATER) and 2 SPAs (BREYDON WATER and GREAT YARMOUTH NORTH DENES). There are a number of programmes which refer to works on the A47 and A12 and it is unclear whether this is referred to in the RSS.</p> <p><u>Additional Natural England comments</u> Great Yarmouth and Lowestoft – again needs to consider the Broadland SPA and Ramsar, and the Broads SAC. Potential also for recreational impacts on Winterton &amp; Horsey Dunes SAC &amp; watery issues need consideration in relation to the Waveney &amp; Little Ouse Valley Fens SAC, &amp; even as far downstream as Redgrave &amp; South</p>	<p>Need to be more specific about which priority this refers to. The RSS allocates growth and identifies these two areas for regeneration already. The sub-regional policy has been through an appropriate assessment.</p> <p>The wording in the Implementation Plan with reference to the river crossings (first row) will be changed to “investigation into the potential for a further road river crossing in each...”</p> <p>Impact of specific schemes such as the power park were broadly assessed through the RSS as part of employment policy and sub-regional policy (GYL1)</p>	<p>No likely significant effects, with wording changes.</p> <p>Natural England agrees with the no LSE conclusion provided that the wording is changed as outlined in our previous comments.</p>

	<p>Lopham Fens Ramsar, as we have advised at the Great Yarmouth BC &amp; Waveney DC water cycle study scoping stage.</p> <p>Wording needs to be changed as suggested to enable conclusion of no LSE to be reached.</p>		
<p><b>Regeneration of both town centres</b> to include new housing, retail and commercial space, improvements to public realm and improving the public access and connections between the centres and the waterfronts.</p>	<p>This policy makes provision for broad types of development and indicates broad locations, but the nature and location of development is to be selected following consideration of options in lower tier plans (development plan documents).</p> <p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p>	<p>No change needed to text of Implementation Plan.</p> <p>The relevant RSS policy is GYL1.</p>	<p>No likely significant effects.</p>
<p><b>Development and promotion as a world leader in energy technology</b> with further development of <b>Lowestoft Power Park</b>, building on the investment at Orbis Energy and the potential for renewables. This would include a focused</p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p> <p>An HRA was not undertaken of the RES</p>	<p><b>Initial response</b> Source is RES The Spatial Response: Great Yarmouth and Lowestoft</p> <p>The power park is not specifically mentioned in the RSS although</p>	<p>No likely significant effects</p> <p>Natural England have agreed no changes are needed to the text.</p>

<p>upgrade of the business park, and development of advanced engineering in oil, gas, nuclear and renewables.</p>	<p>and this has introduced a spatial dimension which could impact on two ES.</p> <p><u>Additional Natural England comments</u>  <b>Initial response</b>  HRA should identify which N2k sites could be affected. Wording will need to change as it's unclear whether development means actual physical development or virtual development in terms of investment and area of expertise? Needs to be addressed given HRA comments from initial report.  <b>Supplementary response</b>  Currently unable to conclude no LSE given existing wording in the Impl Plan – especially given that the power park has not been formally assessed through the RSS.</p>	<p>diversifying employment into renewable energy was (see RPS). Therefore, at a regional level, there is policy that has been assessed. Also the employment and housing policies (sub-regional) have been assessed.</p> <p>Policy GYL1 of the East of England Plan (May 2008) promotes the renewable energy cluster. Waveney's adopted core strategy (Policy CS08) specifically refers to the development of the "energy cluster and 'power park' of around 8 ha".</p> <p><b>Supplementary response</b>  The Power Park has been assessed by local policy. The East of England Plan but policies E3, E4 and GYL1 do support it. The proposal is part of the</p>	
---	---	---	--

		<p><u>adopted core strategy.</u> <u>Policy CS08 states:</u></p> <p>“A renewable energy cluster and ‘power park’ of around 8 ha will be promoted in the Lake Lothing and harbour area of central Lowestoft, especially focused on expanding existing development in the Ness Point and outer harbour area.”</p> <p>The implementation plan reflects regional policy and goes no further than adopted policy.</p>	
<p>Maximising the potential of <b>EastPort</b>, including improvements to connectivity and integration with the rest of Great Yarmouth, alongside the provision of sufficient land supply for port-related activity</p>	<p>This policy makes provision for broad types of development and indicates broad locations, but the nature and location of development is to be selected following consideration of options in lower tier plans (development plan documents). No development could occur through this policy alone, because it is</p>	<p>The outer harbour at Eastport was competed in November 2009.</p> <p>The potential refers to the port as an asset rather than further development. However, “within permitted capacity” could be added</p>	<p>No likely significant effects, with wording changes</p> <p>Natural England agrees with no LSE conclusion provided the Implementation Plan is reworded as suggested.</p>

	<p>implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas</p> <p><u>Additional Natural England comments</u> Please confirm status of Eastport??</p>	to qualify this statement.	
<p>Completion of <b>flood mitigation works to allow development of key sites</b> including Lake Lothing, Lowestoft Power Park and parts of Great Yarmouth harbour areas.</p>	<p>This policy makes provision for broad types of development and indicates broad locations, but the nature and location of development is to be selected following consideration of options in lower tier plans (development plan documents). No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas. Natural England to advise.</p> <p><u>Additional Natural England comments</u> Need confirmation as to whether the flood mitigation proposed has already got approval – please confirm. This doesn't appear to have come from the RSS so Impl Plan may need to be</p>	<p>The East of England Plan places considerable support for regeneration and brownfield redevelopment. Flood mitigation is required for this policy to be implemented. However, the AA did not fully identify flood mitigation.</p> <p>A footnote will be added "Mitigation and adaptation measures are required to implement the regeneration policies of the RSS that refer to brownfield and waterfront redevelopment. No specific proposals are promoted by the Implementation Plan and</p>	<p>No likely significant effects, with addition of footnote</p> <p>Natural England have agreed with this approach</p>

	amended. Can't currently agree with no LSE	any such potential effects would be assessed through the consenting processes specifically relevant to such infrastructure developments".	
Improvements to further and higher education, including the existing college and <b>expansion of the presence and impact of the University of East Anglia and University Campus Suffolk.</b>	<p>This policy makes provision for broad types of development and indicates broad locations, but the nature and location of development is to be selected following consideration of options in lower tier plans (development plan documents).</p> <p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas</p> <p><u>Additional Natural England comments</u> Agree</p>	No change needed to text of Implementation Plan	No likely significant effects

<b>Haven Gateway</b>			
<b>Priority</b>	<b>HRA: Screening comments, with Natural England's comments where appropriate</b>	<b>EEDA/EERA response</b>	<b>Likely significant effects</b>

<p>Maximising its potential as an international gateway with <b>expansion and modernisation of Felixstowe and Harwich ports</b>, including expansion of container capacity and associated logistics. Associated with this is the need to <b>regenerate Felixstowe and Harwich town centres, in particular the seafronts and relationship with the port areas.</b></p>		<p>Insert “within permitted capacity” after Harwich ports.</p> <p>HG2 relates to employment development supporting the “appropriate expansion” of the ports. This term satisfied the requirements of the AA for the East of England Plan. Therefore insert “appropriate” before expansion.</p> <p>The same policy also refers to regeneration of Felixstowe and Harwich.</p> <p>This priority does not go further than existing regional policy and the precise details will be determined through local development documents</p>	<p>No likely significant effects</p> <p>Natural England agrees with no LSE conclusion.</p>
<p>Major <b>transport infrastructure improvements</b> largely associated with the gateway</p>		<p>Felixstowe to Nuneaton gauge improvement.</p>	<p>No likely significant effects, with wording changes</p>

<p>role and the need for improved connectivity to national markets, including the <b>upgrade of the Felixstowe to Nuneaton rail line and increasing the capacity of the A12, A14 and A120</b> (which is crucial to the gateway links to Stansted).</p>		<p>The Felixstowe to Nuneaton project is enhancement works to the existing lines. In addition, the Felixstowe to Peterborough part of the gauge enhancement works (also listed in table 2 within Appendix A of the East of England Plan) was part of the authorisation for the extension of Felixstowe Port.</p> <p>Increasing capacity on:  A12  Collection of improvements planned. Works could include traffic management.</p> <p>A14  Traffic Management Scheme being implemented</p> <p>A120  Improving the link between Braintree to Marks Tey is listed in table</p>	<p>Provided the suggested wording is included in the final Implementation Plan Natural England can agree with the no LSE conclusion.</p>
--	--	---	--

		<p>4 within Appendix A of the East of England Plan. However scheme finalised.</p> <p>Because of the absence of firm proposals for A12 and A120, and the options that could be taken, the working should be changed to be:</p> <p><b>“investigating options to increase the”</b></p>	
<p><b>Science-based business expansion</b> with the development of <b>an expanded business park at Martlesham</b> (which will facilitate considerable housing growth) and consolidation of the <b>research and commercialisation capacity of the University of Essex</b> with the creation of a Knowledge Gateway and International Centre.</p>		<p><b>Innovation Martlesham (BT):</b> As above under the business parks</p> <p>The Appropriate Assessment carried out for Suffolk Coastal concluded that this policy will “have no adverse affect upon the integrity of any European sites”.</p> <p><b>University of Essex</b></p>	<p>No likely significant effects Natural England agrees with no LSE conclusion as proposals have already gone through the planning / appraisal process.</p>

		Planning consent for Gateway and International Centre granted in need to insert date	
Achieving the <b>regeneration of coastal towns, in particular Jaywick</b> , currently one of the most deprived areas in the UK.		This priority repeats policy HG2 of the East of England Plan which includes reference to physical renewal.	No likely significant effects Natural England agrees with no LSE conclusion
Unlocking the potential of <b>key employment sites</b> , currently underutilised and underdeveloped, including Sproughton and Brantham.		<p>This priority refers to the potential which depends on many variables including impact to international sites.</p> <p>The Sproughton site is within 5 km of the Orwell Estuary.</p> <p>The Brantham Site is adjacent to the Stour Estuary.</p> <p>Both sites are covered by saved policies that encourage redevelopment. The precise impacts would</p>	<p>No likely significant effects</p> <p>NE would agree but would suggest rewording is slightly stronger “ensuring no adverse effects on the site integrity of important wildlife sites”</p> <p>EEDA and EERA agree to make this change.</p>

		<p>depend on the uses permitted. Therefore change working to:</p> <p>“Unlocking the potential of key employment sites currently underutilised taking account of environmental constraints, including Sproughton and Brantham</p>	
<p>Further development of Haven Gateway’s regional cultural and tourism potential with a potential <b>International Centre for Classical Music at Aldeburgh and building on the developments of firstsite:newsite and Dance East.</b></p>		<p>The priority is to encourage the cultural and tourism potential of the Haven Gateway and does not include new development.</p> <p>The International Centre for Classical Music opened further facilities in 2009 and future plans reuse existing buildings.</p> <p>The newsite for Firstsite is under construction and Dance East’s site has been completed.</p>	<p>No likely significant effects</p> <p>Natural England agrees with no LSE conclusion.</p>

<p><b>Town centre regeneration in Ipswich and Colchester.</b> Ipswich requires major transport improvements focused on public transport, flood defence works and the expansion of University Campus Suffolk. Colchester's focus is on sites for expansion, enhancing its cultural identity, improving its public realm and the regeneration of its former port and associated river frontages.</p>		<p>Both towns are key centres for development and change and priorities for regeneration within the East of England Plan.</p> <p>This priority reflects the East of England Plan, Colchester's adopted core strategy and Ipswich's submitted core strategy. Applications for the flood defence works will be submitted in Spring 2010.</p>	<p>No likely significant effects</p> <p>Natural England agrees with no LSE conclusion.</p>
--	--	--	--

<b>Heart of Essex</b>			
<b>Priority</b>	<b>HRA: Screening comments, with Natural England's comments where appropriate</b>	<b>EEDA/EERA response</b>	<b>Likely significant effects</b>
<p><b>Employment and business development</b> building on existing strengths in higher value added knowledge jobs, making use of key support to new or relocating businesses through ventures such as through provision of business/technology incubator support and maximising the</p>	<p>The policy will not itself lead to physical development and is considered to be of a kind that would not lead to any adverse effects on ES and associated sensitive areas.</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects</p> <p>Natural England agrees with the no LSE conclusion.</p>

impact of Stansted.			
<p>Remedying the recognised deficiencies in current provision through key <b>improvements to transport and connectivity</b>, including completion of the A120, dualling and expansion of capacity on the A12, M25 and M11.</p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p> <p>No ES designations occur within 5km of these roads. Need guidance on whether building capacity programme is included in RSS as this is unclear as it mentions a number of junction improvements</p> <p><u>Additional Natural England comments</u>  Second row (Transport) - both M11 and M25 are <u>immediately adjacent</u> to Epping Forest SSSI &amp; SAC. (doesn't M11 fit better into London Arc/Harlow/Stansted area?)  Need to amend Impl Plan wording to "...developing the options to improve transport and connectivity...."</p>	<p>The Implementation Plan wording will be changed to "...developing options for key improvements to transport and connectivity...."</p>	<p>No likely significant effects, with wording changes</p> <p>Natural England agrees with the no LSE conclusion provided that the wording is changed as outlined in our previous comments</p>
<p><b>Provision of the key infrastructure to facilitate growth in Chelmsford and Braintree</b> including flood alleviation, major highways and</p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for</p>	<p>Growth at Chelmsford and key infrastructure. CH1 – the HRA assessment considered water and recreational pressure.</p>	<p>No likely significant effects</p> <p>Natural England agrees with no LSE conclusion.</p>

<p>transportation schemes and community infrastructure to allow the development of over 4,000 homes in North Chelmsford and strengthening of green infrastructure.</p>	<p>the effects on ES and associated sensitive areas. There are no ES designations within 5km of Chelmsford or Braintree. It is unclear at this stage whether these programmes have been included in Annex 2 of the RSS.</p> <p><u>Additional Natural England comments</u> Third row (+ sixth row) (Braintree &amp; Chelmsford) - no consideration of any potential ES impacts arising from: water supply, wastewater treatment, increased recreational pressure.</p>	<p>Chelmsford themselves undertook an AA for core strategy in 2006.</p> <p>Braintree. Not referenced in RPS assessment although the housing figures are part of RSS. An AA is underway.</p> <p>The priority reflects adopted policy.</p>	
<p><b>Town centre regeneration and enhancement in Chelmsford, Braintree, Brentwood and Maldon</b> to increase the retail, housing and cultural offers in the three towns and, particularly in Chelmsford's case, to provide employment expansion opportunities.</p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p> <p><u>Additional Natural England comments</u> Agree</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects</p> <p>Natural England agrees with the no LSE conclusion.</p>
<p><b>Tackling both high-level skill needs</b> (including further expansion of Anglia Ruskin University) and <b>low level employment/employability</b> in</p>	<p>The policy will not itself lead to physical development and is considered to be of a kind that would not lead to any adverse effects on ES and associated sensitive areas.</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects</p> <p>Natural England agrees with the no LSE conclusion.</p>

the rural areas, in particular Maldon, by improvement of further education and basic skill training opportunities.	<u>Additional Natural England comments</u> Agree		
<b>Increasing the delivery and availability of appropriate and affordable housing</b> in all parts of the sub-region, with major growth concentrated on Chelmsford and Braintree.	This policy makes provision for a type of development and indicates broad locations, but the location of development is to be selected following consideration of options in lower tier plans (development plan documents). No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.  <u>Additional Natural England comments</u> Agree	No change needed to text of Implementation Plan.	No likely significant effects Natural England agrees with the no LSE conclusion.

<b>London Arc West - Hertfordshire</b>			
<b>Priority</b>	<b>HRA: Screening comments, with Natural England's comments where appropriate</b>	<b>EEDA/EERA response</b>	<b>Likely significant effects</b>
Broaden the housing offer to deliver greater diversity and choice. <b>Overcome particular shortages of affordable and</b>		This is a broad policy and reflects existing policies in the spatial strategy. The priority covers the type of	No likely significant effects Natural England agrees with the no LSE conclusion

<b>key-worker housing</b> and other community infrastructure.		homes rather than numbers.	
Continue to <b>grow the University of Hertfordshire</b> as the UK's leading business-facing university		The priority focuses on non-physical growth	No likely significant effects  Natural England agrees with the no LSE conclusion
<b>A positive approach to green infrastructure including greenbelt review and embracing natural assets such as Lee Valley Regional Park, the Stort Valley, Weald Country Park and Aldenham Country Park.</b>		Greenbelt reviews are part of the East of England Plan. The priority reflects the role of green infrastructure in policy ENV1.	No likely significant effects Natural England agrees with the no LSE conclusion
Build on the performance of and enhancements to the sub-region's globally leading companies and research institutes, <b>supporting and enabling supply chains and business network</b> and supporting the development of third generation science parks.	Natural England comment  Need clarification re Science Parks.	Most of the priority is concerned with non-physical economic development.  Reference to the development of third generation science parks relates to Stevenage which is part of the main programme within Innovation theme.	No likely significant effects
<b>Address the issues of the infrastructure deficit</b> in the		The priority does not identify particular site-	No likely significant effects Natural England agrees

<p>sub-region focusing particularly on water and energy shortages.</p>		<p>specific proposals or measures, which could include demand management measures.</p> <p>Environmental matters could be one of the issues addressed by this priority</p>	<p>with the no LSE conclusion</p>
<p><b>Investment in transport infrastructure</b>, with particular emphasis on routes into London including the M1, rail capacity and sustainable connections between settlements and the airports and addressing east-west public transport links.</p>		<p>This is a wide-ranging priority however, it is clear that physical investment is a major component. Hatfield Forest, Lee Valley, Wormley-Hoddesdonpark Woods and the Chilterns Beechwoods are within this area.</p> <p>At start insert: “Establish feasibility for”...</p>	<p>No likely significant effects, with wording changed</p> <p>Provided wording is changed as suggested then NE could agree with no LSE conclusion.</p>
<p><b>Support key towns as sub-regional centres</b>, enhancements to town centres in particular Stevenage, Watford and its cultural offer, and the town centre environments of the new towns.</p>		<p>This priority supports policies LA4, SV1 of the East of England Plan.</p>	<p>No likely significant effects</p> <p>Already assessed as part of RSS HRA so agree no LSE conclusion.</p>

**London Arc East – Harlow / Stansted Corridor**

Priority	HRA: Screening comments, with Natural England’s comments where appropriate	EEDA/EERA response	Likely significant effects
<p><b>Delivering the employment potential arising within the sub-region</b>, in particular the development of key business clusters. This will require the provision of infrastructure improvements to facilitate this alongside the provision of a range of housing growth and connectivity improvements.</p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects Natural England agrees with the no LSE conclusion.</p>
<p><b>Securing Harlow as a sub-regional centre and catalyst for fundamental change.</b> Joint and effective strategic planning and delivery to ensure its expansion (of homes, jobs growth and economic activity).</p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p> <p><u>Additional Natural England comments</u> Second &amp; third rows (Harlow) - Epping Forest SSSI &amp; SAC is just over 5km away, it could well be impacted by increased traffic and associated air pollution.</p>	<p>Harlow has been thoroughly considered through the RSS. Air quality, recreation etc was considered – see RPS report. The Implementation Plan does not extend any further spatial implications.</p>	<p>No likely significant effects Natural England agrees with the no LSE conclusion.</p>

<p><b>Regeneration of Harlow town centre.</b> Improvements and expansion of retail and commercial space. Address current problems of negative image and perception. The provision of a university in the town, through Anglia Ruskin University, together with major improvements to further education, will greatly assist this as well as addressing key skill shortages.</p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p> <p><u>Additional Natural England comments</u></p> <p><b>Initial response</b> Second &amp; third rows (Harlow) - Epping Forest SSSI &amp; SAC is just over 5km away, it could well be impacted by increased traffic and associated air pollution.</p> <p>- Rye Meads SSSI (part of Lee Valley SPA &amp; Ramsar) is probably within 5km and is <u>certainly linked</u>, as the ES includes part of the Rye Meads sewage works, whose treated effluent is the main water input to the ES. Will provide further comments later.</p> <p><b>Supplementary response</b> The Rye Meads SSSI (and component site of the Lee Valley SPA and Ramsar site) is currently in favourable condition.</p> <p>The report of the Water Cycle Study for</p>	<p><b>Initial response</b> Harlow has been thoroughly considered through the RSS. Air quality, recreation etc was considered – see RPS report. The Implementation Plan does not extend any further spatial implications.</p> <p>Not clear what part of the London Arc East section this refers to.</p> <p>The options for improving the Rye Meads works is being considered. The RSS acknowledges this in para. 10.8. Indeed RPS could not conclude that no effect will occur – hence the qualification in para 10.8.</p> <p><b>Supplementary response</b> NE’s response still does not focus on the regeneration of the town</p>	<p>No likely significant effects, provided wording is changed</p> <p>Natural England has agreed to the wording change</p>
---	--	---	---

	<p>the Rye Meads catchment area concluded that, assuming large scale investment in capacity enhancements at Rye Meads Wastewater Treatment Works(*1), and that the RSS's 'challenging' water efficiency targets can be met (*2), then:</p> <ul style="list-style-type: none"> <li>- for Harlow expansion, there is treatment capacity at least to 2021, and possibly post 2021;</li> <li>- for Stevenage expansion, even treatment capacity to 2021 is questionable (if used for Stevenage, may well impact on post-2021 Harlow expansion), and no capacity post 2021. In addition, the trunk sewer to Rye Meads is already operating at greater than 100% capacity at times (ie it is overflowing). However, all alternative proposals to give Stevenage its own sewage works discharging to a different river would probably fall foul of the Water Framework Directive, as the required discharge quality is unlikely to be achievable. The report therefore recommended a further study and report!</li> </ul>	<p>centre (improvement to commercial floorspace, place marketing, the university and skills) and, instead, refers to the expansion of Harlow and growth at Stevenage.</p> <p>Specific reference to Rye Meads will be made in the sub-regional section under Sub-regional priorities introductory text.</p>	
--	--	--	--

	<p>(*1 There is space to upgrade the Rye Meads sewage works without impacting the SSSI/SPA/Ramsar. The first key upgrade is actually likely to be a new high voltage power supply, as the current supply is close to overloading.)  (*2 Even though the actual average per capita consumption is still rising.)</p>		
<p><b>Improvements to transport infrastructure</b> including M25 widening, M11 hard shoulder operation, improving M11 Junction 7, upgrading of the A414 (including a northern relief road for Harlow to accompany the housing growth) and continued improvements to rail services to London and Stansted.</p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.  Harlow junction with A414 – no designations within 5km. Therefore, no AA is required because programmes have been covered by the HRA undertaken for the RSS.</p> <p><u>Additional Natural England comments</u>  <b>Initial response</b>  States that there are no ES within 5km of Harlow junction with A414. While this is true, as Epping Forest SAC lies at 6.5km, road improvement schemes in this vicinity are of concern to NE due to air quality effects, of increased NOx, for</p>	<p><b>Initial response</b>  Improvements to the A414 are not detailed in the RSS. Essex considering options however, the Harlow by-pass in included in the RSS. Effects on Epping Forest were assessed by RPS including the growth at Harlow.</p> <p>The final Implementation Plan will be rephrased to “Developing options to improve transport infrastructure ...”</p> <p><b>Supplementary response</b>  Agree with suggested</p>	<p>No likely significant effects, with wording changes</p> <p>Natural England have agreed the wording change</p>

	<p>example.</p> <p>M25 is <u>immediately adjacent</u> to Epping Forest SSSI &amp; SAC.</p> <p>why isn't M11 referenced here? (especially as main reason for widening will be Stansted expansion!) (M11 is also <u>immediately adjacent</u> to Epping Forest SSSI &amp; SAC).</p> <p>- A414 improvements and/or Harlow northern bypass may be within 5km of Rye Meads SSSI (part of Lee Valley SPA &amp; Ramsar)</p> <p><b>Supplementary response</b>          Cannot currently agree with no LSE conclusion. Still have concerns over improvements to A414 and potential impacts on Epping Forest SAC. Suggested new wording will go someway to addressing concerns but suggest the following “Developing options to improve transport infrastructure and to improve traffic management.....”</p>	wording	
Balancing the growth agenda with the need to <b>maintain the</b>	The policy is intended to conserve / enhance the natural, built and historic	No change needed to text of Implementation Plan.	No Likely significant effects

<p><b>high quality historic and rural character of the area</b> with high-quality design standards and ensuring excellent green infrastructure as a resource for local communities.</p>	<p>environment, and enhancement measures will not be likely to have any effect on ES or associated sensitive areas.</p> <p><u>Additional Natural England comments</u> Agree</p>		<p>Natural England agrees with the no LSE conclusion.</p>
<p>Maximising the potential arising from the <b>2012 Olympic Games and Paralympic Games</b>, both directly and indirectly from the employment and business opportunities arising from construction, tourism and legacy gains.</p>	<p>The policy will not itself lead to physical development and is considered to be of a kind that would not lead to any adverse effects on ES and associated sensitive areas.</p> <p><u>Additional Natural England comments</u> <b>Initial response</b> Sixth row (Olympics) - aim of maximising benefits for region <u>will</u> lead to development (eg we are already being consulted about team training camps, park-and-ride schemes, etc)</p> <p><b>Supplementary response</b> Currently unable to agree with no LSE conclusion. The knock on impacts are real and this programme is more detailed than what is in the RSS (Olympics is only mentioned in the supporting text). Perhaps something could be put into the Implementation Plan which also mentions opportunities</p>	<p><b>Initial response</b> It is unclear what the potential problem is here. The emphasis is on economic rather than spatial development. There are other policies to protect inappropriate development which would take precedence. The cumulative effects are conjectural.</p> <p>The emphasis is on economic rather than spatial development.</p> <p>There are other policies to protect inappropriate development which would take precedence.</p> <p><b>Supplementary</b></p>	<p>No Likely significant effects, with insertion of footnote</p> <p>Natural England have agreed this approach</p>

	<p>for improving the natural environment and provision of green infrastructure.</p>	<p><b>response</b>  NE's concerns are understandable because there appears to be spatial implications. However, this priority does not identify sites and could not be used to support a particular development because it only relates to employment and business development on an economic (networking, linking supply chains, preparing employees and businesses) rather than physical basis.</p> <p>A footnote will be added to clarify this position: "This priority relates to employment and business development on an economic basis, and is not intended to identify any particular physical sites".</p> <p>Green infrastructure is part of the previous priority.</p>	
--	---	---	--

**Luton and South Bedfordshire**

Priority	HRA: Screening comments, with Natural England's comments where appropriate	EEDA/EERA response	Likely significant effects
<p><b>Further growing the role of London Luton Airport</b> as an international gateway to the area and a major employment generator/source.</p>	<p>The policy will not itself lead to physical development and no development could occur through this policy alone, because it is implemented through sub-ordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p> <p>No ES designations within 10km from Luton airport and therefore it is unlikely that an HRA will be required at this stage.</p> <p><u>Additional Natural England comments</u> The wider implications of Luton Airport expansion– there are no ES within 10km, though the wider implications in terms of air quality and climate change are likely to impact upon ES across a wider area than this. Likewise the wider implications of major road expansion in this western edge of the county, and whether this has implications for aerial pollution across the region.</p>	<p>The expansion of Luton Airport is supported by the RSS, with the usual qualification on impact on wildlife sites. The impact on climate change is not a regional concern given the national policy support and that other regulatory measures will be in place. The text in the Implementation Plan will be changed to refer to <b>Growing the role of London Luton Airport within permitted capacity</b> for clarity.</p>	<p>Natural England agrees with no LSE conclusion provided Implementation Plan wording is changed as suggested by EEDA/EERA.</p>

<p><b>Investment in infrastructure to support growth, including M1 widening, alternative traffic management, junction 10a improvements, a new Junction 11a, the A5-M1 link and Woodside connection, East Luton Corridor, Luton Northern Bypass, Luton North, and Luton Parkway Station.</b></p>	<p>The policy relates to the provision of funds to support infrastructure development in specific areas of need. Any development made more feasible through this policy would however be implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p> <p>Junction 10a – no designations within 5km  Junction 11a – no designations within 5km of potential location.  East Luton Corridor – no designations within 5km  Luton Parkway Station – no designations within 5km  Luton North – North of Luton there are no designations within 5km</p> <p>No AA is required because programmes have been covered by the AA undertaken for the RSS.</p>	<p>Source is Policy T15 (listed in table 3 within Appendix A of the East of England Plan), Projects also listed in figure 4 of the MKSM sub-regional strategy e.g Luton Northern Bypass</p> <p>No AA is required because priorities have been covered by the HRA undertaken for the RSS.</p> <p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects</p> <p>Natural England agrees with no LSE conclusion</p>
<p><b>Continuing the move to higher value industries through the provision of sufficient high-quality</b></p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and</p>	<p>Luton is identified as a KCDC which is covered through the Sub-regional strategy for Milton Keynes.</p>	<p>No likely significant effects</p> <p>Natural England agrees with no LSE conclusion</p>

<p>employment land and adequate infrastructure, <b>building on current investments at Butterfield Business and Technology Park, Napier Park</b> and providing new opportunities for similar developments in the new growth areas.</p>	<p>therefore more appropriate to assess for the effects on ES and associated sensitive areas.          Butterfield – no designations within 5km          Napier Park – no designations within 5km          Therefore it is considered that no AA will be required at this stage</p>	<p>No change needed to text of Implementation Plan.</p>	
<p><b>Town centre regeneration</b> of the sub-regional centre of Luton, and the other towns in the sub-region - Dunstable, Houghton Regis and Leighton Linsdale to address transport issues, provide modern quality urban environments and a range of retail and services to serve the growing population and attract visitors.</p>	<p>This is a high level policy which makes provision for types of development and indicates broad locations, but the nature and location of development is to be selected following consideration of options in lower tier plans (development plan documents). Therefore, no development could occur through this policy alone, because it is implemented through sub-ordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects.          Natural England agrees with no LSE conclusion</p>
<p>Protect and expand green infrastructure across the sub-region, but with particular emphasis on <b>effective integration of green infrastructure into urban areas through new</b></p>	<p>The policy is intended to protect and enhance the natural environment and will not be likely to have any adverse effect on a European Site.</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects.          Natural England agrees with no LSE conclusion.</p>

<b>development.</b>			
<b>Address the issue of low skills.</b> Promoting the role of the University of Bedfordshire as a knowledge hub and ensuring further education provision is expanded at Barnfield, Luton and Dunstable colleges.	This policy itself does not specifically prescribe physical development. Any development relating to achieving this policy would be implemented through sub-ordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas	No change needed to text of Implementation Plan.	No likely significant effects Natural England agrees with no LSE conclusion.

<b>North / West Norfolk and West Suffolk</b>			
<b>Priority</b>	<b>HRA: Screening comments, with Natural England's comments where appropriate</b>	<b>EEDA/EERA response</b>	<b>Likely significant effects</b>
The development of <b>a range of new housing in the growth points at King's Lynn, Thetford and Bury St Edmunds. Supply of affordable homes</b> is a particular priority in parts of North Norfolk and the other market towns.	This priority is non-spatial but has spatial implications. It is recommended that these will require AA within subordinate plans	Growth already part of adopted policy, particularly KL1 and TH1  However, policy TH1 includes: <i>"which avoid harm to the Breckland SPA and/or Breckland SAC" to reflect RPS's concerns.</i>  <b>Wording has changed slightly from consultation draft</b>	No Likely Significant Effects  Given that this priority is delivering what is contained in the sub-regional policy of the RSS we agree with no LSE conclusion as this will have been assessed in the RSS HRA.

		<p>The main areas affected by KL1 and TH1 by RPS were:  Breckland SPA and Breckland SAC  Roydon Common and Dersingham Bog SAC and RAMSAR  Wash and North Norfolk Coast SAC, SPA and Ramsar site  The Wash SPA and Ramsar Site.</p> <p>These should have been included in the original assessment.</p>	
<p><b>Improving the amount and quality of jobs, in particular to address the low-wage economy</b> through new employment sites and improving skills of the workforce. The Kings Lynn Academy, the National Construction College, and facilities for the College of West Anglia, Anglia Ruskin University in King's Lynn and</p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.  College of West Anglia and Anglia Ruskin University - both have 1 Ramsar site (THE WASH), 1 SPA (THE WASH) and 1 SAC (THE WASH &amp; NORTH NORFOLK COAST) within 5km</p>	<p>Sources and status of policies:</p> <p>KL1 provision for employment to support economic development.</p> <p>TH1: growth of employment base.</p> <p>North Norfolk Adopted Core Strategy (Policy SS5</p>	<p>Natural England agrees with no LSE conclusion.</p>

<p>University Campus Suffolk in Bury St Edmunds are vital components.</p>	<p>This appears to provide more detail on RSS Policy KL1. This is site specific on locations which are in proximity to ES.</p>	<p>and proposals map) designated sites.</p> <p>College of West Anglia - Planning permission granted for new campus in Nov 2008</p> <p>No change needed to text of Implementation Plan.</p>	
<p><b>Coastal erosion</b> is having a significant impact on the communities and economy of the North Norfolk coast. Action needs to be taken to defend or to compensate, to avoid uncertainty.</p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p> <p><b>Natural England comments</b> This priority is rather ambiguous and it isn't clear what it is trying to achieve. This will need to be reworded to ensure coastal erosion takes account of significant impacts on the environment as well as on the communities and economy of this sub-region. It should be reworded to "Coastal erosion is having a significant impact on the communities, economy <b>and the environment</b> of the North Norfolk Coast. <b>Strategies for the</b></p>	<p>EEDA and EERA feel that the priority is not promoting coastal erosion.</p> <p>The priority is calling for action (to defend or to compensate) rather than promoting specific physical schemes.</p> <p>Nonetheless, we will include the changes that Natural England suggest.</p>	<p>No likely significant effects (with wording change).</p> <p>Natural England have agreed this approach</p>

	<p><b>coast should adopt an integrated approach that recognises and responds to the likelihood of increased flood and erosion risks as a result of climate change,</b></p> <p>Natural England cannot agree with no LSE as the wording currently takes no account of the impact on the natural environment and the N2k sites which are present along the north Norfolk coast. Wording of impl plan needs changing.</p>		
<p><b>Flood risk</b> mitigation investment is a key priority that predicated the growth in King's Lynn.</p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p> <p>It should be noted that 2 Ramsar sites (The Wash and Roydon Common), 1 SPA (The Wash) and 2 SACs (Roydon Common &amp; Dersingham Bog and The Wash &amp; North Norfolk Coast) lie within 8km of Kings Lynn and flood risk mitigation within the area would need to ensure the conservation and protection of these.</p>	<p>Policy KL1 of the East of England Plan details the growth and the need for account to be made to flood risk is identified in the supporting text.</p> <p>King's Lynn and West Norfolk's core strategy (and accompanying AA) provides further detail</p> <p>NE comment suggests what the priority should be rather than assessing whether the priority has</p>	<p>No likely significant effects, with wording changes</p> <p>Natural England have agreed this approach</p>

	<p>This appears to provide more detail on RSS Policy WAT4. Defers to CFMPs for detail.</p> <p><b>Natural England comments</b></p> <p>This priority should also be about mitigation and adaptation and the priority should focussed on the sustainable growth of Kings Lynn. Therefore suggest this is reworded to better reflect the Programme Theme on floodrisk and the need to ensure there will be no LSE on N2K sites. We suggest the following “flood mitigation <b>and adaptation</b> investment is a key priority <b>to ensure the sustainable growth of parts</b> of King’s Lynn.</p> <p>Natural England disagrees with no LSE conclusion as currently worded.</p>	<p>been assessed elsewhere or with has no LSE.</p> <p>Core Strategy (which has been subject to an AA) refers to the need for growth and regeneration. It specifically refers to flood-protection strategies in King’s Lynn and mitigation through appropriate design and engineering solutions.</p> <p>The implementation priority identified is achieving mitigation. There are other regional and local policies that refer to adaptation.</p> <p>Nonetheless, we have agreed to make the wording change.</p>	
<p>Tourism is important to sustaining the local economy. The priority is to <b>improve visitor spend whilst promoting sustainable</b></p>	<p>The policy or proposal will not itself lead to development and is considered to be of a kind that would not lead to any adverse effects on ES and associated sensitive areas.</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects Natural England agrees with no LSE conclusion.</p>

<p><b>tourism.</b></p> <p>Resolving the <b>infrastructure deficit and delivering infrastructure to support growth.</b> Whilst the growth points have some degree of resource for infrastructure, utilities, social and green infrastructure are required, in particular provision of new hospitals in Bury St Edmunds and Kings Lynn.</p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects Natural England agrees with no LSE conclusion</p>
<p>Access improvements <b>are needed to road (A14, A10 and A47) and rail (Sheringham-Norwich, Norwich-Cambridge, Bury St Edmunds bus and rail interchange &amp; rail services). The sub-regional priorities are to improve the A47 between the A1 and Great Yarmouth, dualling the A11, Peterborough/A1, Bury St Edmunds relief road and A14 junctions.</b></p>	<p>The policy makes provision for types of development and indicates broad locations, but the nature and location of development is to be selected following consideration of options in lower tier plans (development plan documents). Therefore, no development could occur through this policy alone, because it is implemented through sub-ordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p> <p><b><u>Additional Natural England comments</u></b> Please confirm status of road schemes</p>	<p>Access improvements include better management rather than physical works. An example is the A14 Management programme which is underway. However this priority contains some schemes that need to be investigated further.</p> <p>At start insert: "Further establish feasibility for access improvements needed to road"...</p>	<p>No likely significant effects, provided wording is included.</p> <p>Natural England have agreed this approach.</p>

		<p>Also. Need to qualify Bury St Edmunds to "Eastern Relief Road".</p> <p>The proposed change reflects the fact that schemes along the A1, A47 and A10 are subject to further feasibility which can include impact on sites relevant to HRA.</p> <p>Given the amendment (similar amendments have been excepted elsewhere) the remaining schemes should not need further explanation.</p> <p>The duelling of A11 could be removed because the assessments have been completed (the inquiry has closed), the Eastern Relief Road at Bury St. Eds is part of the submitted (and HRA assessed) core strategy.</p>	
Achieve greater self-containment by <b>developing</b>	No development could occur through this policy alone, because it is	No change needed to text of Implementation Plan.	No likely significant effects

<p><b>the role of town centres</b> through improving the built environment, accessibility and ensuring that the range of services available are protected and enhanced to serve the town and the rural hinterland with a particular emphasis in Bury on the provision of office space. Protect the historic settlements of Kings Lynn, Bury St Edmunds and Thetford.</p>	<p>implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p>		<p>Natural England agrees with no LSE conclusion</p>
<p>Improvements to <b>green infrastructure</b>. In Thetford, the green infrastructure is critical to mitigate the impact of growth on protected habitats, a similar approach is likely to be required in King's Lynn and is an identified priority in Bury St Edmunds.</p>	<p>The policy is intended to protect and enhance the natural environment, including biodiversity and protected habitats, and will not be likely to have any adverse effect on a European Site.</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects  Natural England agrees with no LSE conclusion</p>

<b>Thames Gateway South Essex</b>			
<b>Priority</b>	<b>HRA: Screening comments, with Natural England's comments where appropriate</b>	<b>EEDA/EERA response</b>	<b>Likely significant effects</b>
<p>Maximising the benefits of the strategic location through the development of <b>London</b></p>	<p>The policy will not itself lead to development and is considered to be of a kind that would not lead to any</p>	<p>For the avoidance of doubt, the empowerment order to develop the</p>	<p>Permission has already been granted to develop the London Gateway Port.</p>

<p><b>Gateway Port and the associated business parks</b> as a world-class gateway. The success of this is dependant to a significant degree on the links with transport (see below).</p>	<p>adverse effects on ES and associated sensitive areas. There are no ES designations within 5km of London Gateway Port, near West Thurrock and therefore no Appropriate Assessment is required at this stage. An Appropriate Assessment already undertaken for this scheme. – NE to confirm.</p> <p><u>Additional Natural England comments</u> Justification states: “no ES designations within 5km of London Gateway Port”. This is incorrect as the Thames Estuary and Marshes SPA/Ramsar site lies directly to the west and south of London Gateway Port and it is very difficult to ascertain no LSE in maximising benefits of the strategic location of London Gateway Port.</p> <p>In addition, the port development includes increased dredging which could potentially affect other ES further down the Thames estuary.</p>	<p>London Gateway Port and the logistics park was granted in May 2008. This is the authorisation necessary and included an HRA assessment. We recognise that this would include the Thames Estuary and Marshes SPA/Ramsar.</p> <p>The associated business parks statement is less clear but no specific proposals are promoted by this statement. Furthermore, policy ETG5 of the RSS seeks to increase employment including sites and premises that support Thurrock’s role as a logistics centre.</p> <p>No change needed to text of Implementation Plan.</p>	<p>The proposal has been subject to a HRA and this concluded Adverse Effect On Integrity. The project is proceeding only because IROPI accepted, no alternatives, and comp measures secured.</p> <p>EEDA/EERA response - The statement from Natural England should refer to the impacts of this priority rather than the previous decision from which it is based. Therefore we conclude no likely significant effects.</p>
<p>Matching growth to skills through the development of <b>new business focused facilities including an</b></p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects Natural England agrees with no LSE conclusion</p>

<p><b>academy for logistics and ports.</b> Maximise the benefits of the university presence in Southend and major new college investments in Basildon and Thurrock.</p>	<p>therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p>		
<p><b>Transforming the gateway into an eco sub-region.</b> London Gateway has the potential to act as a demonstrator for renewable energy technologies building on current investments in automotive energy efficiency in Basildon and a new bio energy park in Thurrock.</p>	<p>This policy itself does not specifically prescribe physical development or spatial contexts. Further, any development relating to achieving this policy would be implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.</p> <p>Natural England comments Need clarification as to which policy this is delivering as there doesn't appear to be any reference to renewable energy technologies or a new bio energy park in Thurrock. Need confirmation as to status of these.</p>	<p>No change needed to text of Implementation Plan.</p>	<p>No likely significant effects</p>
<p>A <b>programme of town centre regeneration</b> is required with a focus on Southend-on-Sea, Basildon, Thurrock and Castle Point, alongside the major</p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for</p>	<p>Town centre regeneration includes social, economic as well as physical development. The regeneration of</p>	<p>Lakeside Basin has been subject to EiP and HRA.  Therefore, no likely significant effects.</p>

<p>reinvention of the Lakeside Basin and West Thurrock.</p>	<p>the effects on ES and associated sensitive areas.          Provided there are considerable numbers of brownfield sites within each of these and no ES sites no further wording change is required.          Assume this is so as relates to town centres.          Southend-on-sea – 2 Ramsars/SPAs (Crouch &amp; Roach Estuaries (Mid Essex – Coast Phase 3) and Benfleet and Southend Marshes), and 1 SAC (Essex Estuaries) within 5km of town centre.          Basildon – no ES designations within 5km of site.          Thurrock – no ES designations within 5km of the site          Castle Point – 2 Ramsar/SPA sites (Thames Estuary &amp; Marshes and Benfleet and Southend Marshes) within 5km          Cannot locate boundaries of Lakeside Basin.          West Thurrock – no designations within 5km          It is considered that the location and nature of development is sufficiently broad that no AA is required at this stage.</p>	<p>Southend is included in policy ETG4 of the RSS.</p> <p>Similar to regeneration above. The emphasis is brownfield land within the town centres – although Thurrock and Basildon are also covered by ETG2 and ETG3.</p> <p>Lakeside Basin has been subject to EiP and HRA. Lakeside Basin policy now adopted.</p> <p>No change needed to text of Implementation Plan</p>	
---	--	---	--

	<p><u>Additional Natural England comments</u>  Fourth row (Supporting town centres) -  Southend - depending upon how you define the 'town centre' of a seaside resort (ie does it include the central section of seafront?),  - the Foulness SSSI, SPA &amp; Ramsar is probably also within 5km.  - Lakeside Basin – the boundary can be defined it has just had a single subject RSS review.</p> <p>Justification states that there are no ES designations within 5km of Basildon and Thurrock. Assuming “Basildon” and “Thurrock” refer to the whole LPA area, rather than specific town centres (which are currently undefined), then there <u>are</u> ES designations within 5km in Thurrock, namely the Thames Estuary and Marshes SPA.</p> <p>For Basildon, there are none. With respect to this sub-regional priority (vital town centres) the justification considers that the location and nature of development is “sufficiently broad that no AA is required at this stage”. It is</p>		
--	---	--	--

	always difficult to assess whether LSE is triggered at a strategic level; as this priority is unlikely to result in greater recreational disturbance the report's conclusion seems reasonable.		
<b>Promoting green infrastructure and innovative flood protection</b> to improve the quality of the environment and create habitats/attract visitors through the ongoing application of the 'Green Grid'.	This policy is not spatially specific and is intended to protect the natural environment, including biodiversity. It is considered to be of a kind that would not lead to any adverse effects on ES and associated sensitive areas.	No change needed to text of Implementation Plan	No likely significant effects Natural England agrees with no LSE conclusion
<b>Supporting housing growth</b> through the creation of sustainable communities aligned with economic development and unlocking the potential of sites.	This policy itself does not specifically prescribe physical development or spatial contexts. Further, any development relating to achieving this policy would be implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas  Need clarification of which policy this priority is delivering.	No change needed to text of Implementation Plan	No likely significant effects Provided this is just delivering what is already contained in the RSS sub-regional policy then Natural England would agree with no LSE conclusion.
<b>Tackling regeneration of deprived communities.</b> Targeted investment increasing	This policy does not specifically prescribe physical development or spatial contexts. It is considered to be of	No change needed to text of Implementation Plan	No likely significant effects Natural England agrees with no LSE conclusion

<p>life chances for those people living there and connecting local residents to new employment opportunities.</p>	<p>a kind that would not lead to any adverse effects on ES and associated sensitive areas.</p>		
<p><b>Meeting the challenges of connectivity</b> by realising and harnessing the potential of London Southend Airport as a key transport gateway. Investing in key road infrastructure including J30/31 on the M25, the A130/A13 junction and the A127 in Southend, developing an improved public transport system including enhancements to bus and rail and demand management.</p>	<p>No development could occur through this policy alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for the effects on ES and associated sensitive areas.  NB J30/31 – no designations within 5km  A130/A13 – 1 Ramsar site (BENFLEET AND SOUTHEND MARSHES) and 1 SPA (BENFLEET AND SOUTHEND MARSHES) within 5km  Southend– 2 Ramsar sites (CROUCH &amp; ROACH ESTUARIES (MID-ESSEX COAST PHASE 3) and BENFLEET AND SOUTHEND MARSHES), 2 SPAs (CROUCH &amp; ROACH ESTUARIES (MID-ESSEX COAST PHASE 3) and BENFLEET AND SOUTHEND MARSHES), and 1 SAC (ESSEX ESTUARIES) within 5km from end of A127 in Southend.  These transport programmes have been covered by the HRA undertaken for the RSS.</p>	<p>The implementation plan does not suggest growing the airport (unlike policy E7 of the RSS), instead it describes it as a transport gateway (through air, rail and bus for example).  The Plan will refer to <b>permitted capacity</b>.</p>	<p>No likely significant effects   Provided the wording of the Impl Plan is changed to “within permitted capacity”.</p>

	<p><u>Additional Natural England comments</u> Eighth row (Southend Airport) - all very well looking at ES within 5km of road links to the airport; but need to consider impacts from the airport expansion itself? (eg potentially increased amount of flying over ES)</p>		
<p><b>Driving forward innovation across priority sectors</b> through support for creative industries, including the Production Campus and Creative National Skills Academy in Thurrock and a focused offer in Southend-on-Sea built around the university, METAL and thriving arts and new media businesses and other potential hubs such as at Ford Dunton.</p>	<p>This policy itself does not specifically prescribe physical development, but rather supports existing programmes, institutes, businesses and potential hubs. It is considered to be of a kind that would not lead to any adverse effects on ES and associated sensitive areas.</p>	<p>No change needed to text of Implementation Plan</p>	<p>No likely significant effects Natural England agrees with no LSE conclusion</p>

### 3.3 In combination effects assessment

In Enviro's HRA on the draft consultation version of the Implementation Plan, it concluded that *'there are a number of areas where numerous programmes converge spatially or thematically. These are generally high priority topics for the region and include coastal flooding and regeneration; services and housing provisions in rural areas; transport infrastructure; and renewable energy. However, none of the programmes were considered to potentially exacerbate negative effects upon ES..... There are a number of sub-regional programmes which have the potential to impact upon ES. The exact nature and location of any impacts is not defined within programmes at this scale, however it is noted that there is an emphasis on development in areas that are in proximity to The Wash along its coastal boundary. However, it is not possible to determine whether these impacts will be significant. It is recommended that further assessment be undertaken within subordinate documents'*.

Regarding Enviro's recommendations over subordinate documents these will in the main comprise Local Development Documents which are legally required to undergo assessment under the Habitats Regulations. These provide the more detailed expression of the policies in the RSS which the Implementation Plan is setting out the means to deliver. The RSS has already been subject to a thorough process of Habitats Regulations Assessment, which considered both the effects of the plan itself and those in combination with other plans and projects. The conclusion was that the RSS would have no adverse effects on European sites. The RES was not subject to a Habitats Regulations Assessment as, unlike the RSS, it did not form part of the statutory development plan and had no legal force through the Planning Act over any subsequent planning policies or decisions that might have an effect on a European Site.

### 3.4 Dealing with uncertainty

The higher the level of a plan in the hierarchy the more general and strategic will be its provisions and therefore the more uncertain its effects will be. The protective nature of the Habitats Directive is intended to operate at these differing levels. It is accepted that in some circumstances assessment 'down the line' will be more effective in assessing the potential effects of a proposal. As part of the HRA screening process where this down the line justification has been identified we have ensured the following tests have been met:

- The higher tier plan assessment cannot reasonably assess the effects on a European site in a meaningful way.
- The Habitats Regulations Assessment of lower tier plans, which identifies more precisely the location, scale and nature of development, will be able to change the proposal if an adverse effect on site integrity cannot be ruled out. This can occur as the lower tier plan is free to change the nature and scale of development in order to avoid any adverse effects.

- The Habitats Regulations Assessment of the plan at the lower tier is required as a matter of law or Government Policy.

## 4. Conclusions

The HRA process and parallel discussions with Natural England have been important inputs into development of the final East of England Implementation Plan. A number of changes were made to the Implementation Plan as a direct result of these appraisal processes as follows:

- a statement in the Introduction to the Implementation Plan clarifying the role of the Implementation Plan: “Notwithstanding these appraisals, this Implementation Plan does not create new policy or make amendments to existing policy. The statements contained within this document form agreed next steps in the process of implementing the RES and RSS and do not supersede the relevant policies that are regional and expressed locally. For the avoidance of doubt, the contents of this Implementation Plan are not designed to be used in determining planning and other related applications for new development”
- a number of changes to the thematic programmes at consultation draft stage. These included removal of the low carbon transport fuels component of the Low Carbon Energy Sectors Programme in Utilities and examples of specific locations of transport improvements in the Transport theme
- textual changes in section 1 of the final Implementation Plan to give a greater profile to the role of the HRA
- a number of changes to the wording of the sub-regional priorities in the final Implementation Plan. These include:
  - insertion of ‘within permitted capacity’ to description of growing the role of Luton and Southend Airports, and to Eastport
  - inclusion of ‘further investigation in the potential for’ when referring to road/river crossings in Great Yarmouth
  - inclusion of ‘developing options for’ or ‘investigating feasibility’ with reference to transport infrastructure improvements in several sub-regions
  - addition of ‘look into the feasibility of’ with reference to the low carbon creative industries incubator in Greater Cambridge
  - deletion of specific locational reference to Magna Park in Greater Peterborough
  - inclusion of footnote to clarify the scope of the priority related to the Olympic Games
  - insertion of footnote to clarify Norwich Northern Distributor Road
  - insertion of footnote to clarify flood mitigation works in Great Yarmouth and Lowestof

- specific reference to the issue of Rye Meads in the utilities theme and in two appropriate sub-regional sections

The outcome of the HRA process was that it concluded that there are no LSE either alone or in combination deriving from the Implementation Plan.