

Coastal Zone Local Development Order

Stage 1 Habitat Regulations Assessment

The Local Development Order

1. East Lindsey District Council is proposing to introduce a Local Development Order (LDO) across the Coastal Zone, as defined in the East Lindsey Local Plan (ELLP). LDOs were introduced by the Planning and Compulsory Purchase Act 2004, although aspects of their preparation have been amended by subsequent legislation. An LDO effectively grants planning permission within a defined area for the development of specified land uses. The coastal zone makes up 38% of East Lindsey's administrative area and a map showing the area is included in Schedule 1 of the LDO.

The Regulations

2. Regulation 80 of the Conservation of Habitats and Species Regulations 2017 (as amended) refers to Local Development Orders, and states that:

"A local development order made on or after 30th November 2017 may not grant planning permission for development which—

(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects); and

(b) is not directly connected with or necessary to the management of the site."

3. An assessment is therefore required to establish if the provisions of the LDO are likely to have such significant effects.

The Habitat Regulations Assessment (HRA) Process

4. There are four stages to a HRA. The first stage is referred to as screening. This determines whether the plan is likely, alone or in combination with other plans and programmes, to have a significant effect on European sites. This will determine whether or not a full 'Appropriate Assessment' is needed. If it is deemed to have significant effects, Stage 2 (Appropriate Assessment) then determines whether, in view of the sites conservation objectives, the plan would have an adverse effect on the integrity of the site. This allows the plan to be fine tuned as it emerges to ensure significant effects on European sites are avoided. *If stages 1 and 2 are successful in avoiding any significant effects on the integrity of international sites, Stages 3 and 4 will become unnecessary.* Stage 3 is the Assessment of Alternative Solutions. Where the plan is considered to have an adverse effect on the integrity of a site or sites, there should be an examination of alternatives solutions to avoid negative impacts. Stage 4 is - Assessment where no alternative solutions remain and where adverse impacts remain. Where adverse effects remain, compensation measures are required,

however, plans will only be permitted where the plan would be necessary for Imperative Reasons of Overriding Public Interest (IROPI).

5. This document represents the first stage in the process. The screening stage identifies whether a plan - either alone or in combination with other plans or projects - is likely to have a significant impact on a European site. Screening, should:

- i. Identify if there are any sites falling under the regulations, which may be affected by the proposals
- ii. Determine whether the plan is directly connected with or necessary to the management of the protected site – if it is, then no further assessment is necessary;
- iii. Describe the plan or project and other plans and projects that, 'in combination', have the potential to have significant effects on a European site;
- iv. Examine the conservation objectives for the site or sites;
- v. Identifying the potential effects on the European site in terms of magnitude, duration, location and extent; and
- vi. Assess the significance of any effects on the European site.

Screening

6. There are ten internationally designated sites along the coast, including:

- Humber Estuary Special Area of Conservation (SAC)
- Humber Estuary Special Protection Area (SPA) and Ramsar sites;
- Greater Wash SPA;
- Saltfleetby-Theddlethorpe Dunes and Gibraltar Point SAC;
- Gibraltar Point SPA and Ramsar;
- The Wash and North Norfolk Coast SAC; and
- The Wash SPA and Ramsar sites.

7. The LDO is not directly connected with or necessary to the management of any of these protected sites, therefore further assessment is required.

The Local Development Order

8. East Lindsey District Council is proposing to introduce an LDO across the Coastal Zone, as defined in the ELLP. The area covered by the LDO comprises 38% of the Council's administrative area. The LDO applies only to existing Holiday Parks within that zone. Holiday Parks being defined as – 'any site that benefits from planning permission for the stationing of Caravans but also including lodges, log cabins, chalets, apartments and camping pitches for a

holiday purpose (whether by express planning permission, existing or authorised use) and the Council has verified the same and the extent of the land included in accordance with condition 2.1 of Schedule 3 to this Order Proposals related’.

9. Subject to certain criteria, the LDO would permit the following:

Schedule 2

Part 1

Within the Coastal Zone, planning permission is hereby granted for a period of two years commencing on the date that the Order is adopted for the use of any Caravan, lodge, log cabin, chalet, apartment and camping pitch located within a Holiday Park for holiday purposes at any time of the year.

Part 2

Within the Coastal Zone, planning permission is hereby granted for the following Development within a Holiday Park:

- (i) The Development of buildings, structures and engineering works ancillary to the operation of that Holiday Park
- (ii) The change of use of any building located within a Holiday Park to any use ancillary to the operation of that Holiday Park
- (iii) The Development of a restaurant
- (iv) The Development of a café
- (v) The Development of a games room
- (vi) The laying out of an equipped children’s play area
- (vii) Laying out of sports pitches and facilities including swimming pools, changing rooms and flumes
- (viii) The development of a grocery/convenience store (providing that such a store is ancillary of the operation of the Holiday Park)
- (ix) The development of a pavilion/function room/hall.

Part 3

Within the Coastal Zone, planning permission is hereby granted for the following minor operational Development within a Holiday Park:

- (i) Changes to the external appearance of buildings, including recladding and alterations to doors and windows
- (ii) Changes to pedestrian access routes into a building

- (iii) Provision of cycle parking
- (iv) Provision of covered bin stores
- (v) Provision of lighting columns
- (vi) Provision of CCTV
- (vii) Provision of canopy structures
- (viii) Provision of ATMs
- (ix) Provision of EV charging points
- (x) Telecommunication apparatus

10. The LDO requires that a Notification of Development Form is filled in and submitted to the Council before the Order is relied upon. The developed area of the site will not be extended via the LDO and the approved layout of the pitches within a site shall not be amended, unless expressly approved by the Council. Any Development shall be ancillary to the operation of the Holiday Park and there are limitations on height, floorspace and proximity to dwelling houses. Development is not permitted within 300m of designated European Sites, although this limitation does not apply to the extension to the period of occupancy.

The Sites

The Humber

11. The Humber Estuary is a large estuary with a high tidal range. The high suspended sediment loads in the estuary feed a dynamic and rapidly changing system of accreting and eroding intertidal and sub-tidal mudflats and sand flats as well as saltmarsh and reedbeds. Other notable habitats include a range of sand dune types in the outer estuary, together with sub-tidal sandbanks and coastal lagoons. A number of developing managed realignment sites on the estuary also contribute to the wide variety of estuarine and wetland habitats. The estuary supports a full range of saline conditions from the open coast to the limit of saline intrusion. As salinity declines upstream tidal reedbeds and brackish saltmarsh communities fringe the estuary.

The Humber SAC

12. The Humber Estuary SAC extends about 70km from the mouth of the Humber, past the ports of Grimsby, Immingham, Hull and Goole and up to the limit of saline intrusion on the rivers Ouse and Trent, and along the East Lindsey coastline as far as Mablethorpe North End. The SAC is home to a significant breeding population of the grey seal. Intertidal mud on the Humber has high organic matter and the resulting food resource supports numerous SPA birds of international and national importance as well as juvenile flatfish. Littoral sands

and muddy sands are a major component of the Humber Estuary mudflats and sand flats feature and cover large areas of the outer estuary, particularly on more sheltered shores and at the mouth of the estuary. The sediments of the north bank of the outer estuary are mainly sands and muddy sands, particularly from Cleethorpes to Donna Nook where conditions are relatively stable, while the sediments of the south bank of the outer estuary are predominantly sandy. These also provide large areas of habitat for numerous SPA birds of international and national importance. The high diversity of the species living within these sediments makes this habitat particularly important in terms of the food resource for birds, as well as for flatfish such as plaice and flounder.

Conservation objectives

13. Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and habitats of qualifying species rely
- The populations of qualifying species, and
- The distribution of qualifying species within the site.

Qualifying Features

- H1110. Sandbanks which are slightly covered by sea water all the time; Subtidal sandbanks
- H1130. Estuaries
- H1140. Mudflats and sand flats not covered by seawater at low tide; Intertidal mudflats and sand flats
- H1150. Coastal lagoons*
- H1310. Salicornia and other annuals colonising mud and sand; Glasswort and other annuals colonising mud and sand
- H1330. Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)
- H2110. Embryonic shifting dunes
- H2120. Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes"); Shifting dunes with marram
- H2130. Fixed dunes with herbaceous vegetation ("grey dunes"); Dune grassland*
- H2160. Dunes with *Hippophae rhamnoides*; Dunes with sea-buckthorn
- S1095. *Petromyzon marinus*; Sea lamprey
- S1099. *Lampetra fluviatilis*; River lamprey
- S1364. *Halichoerus grypus*; Grey seal

The Humber SPA and Ramsar Site

14. The Humber SPA and Ramsar sites also extend as far as North End Mablethorpe. On the North Lincolnshire coast, the saltmarsh is backed by low sand dunes with marshy slacks and brackish pools. Parts of the estuary are owned and managed by conservation organisations. The estuary supports important numbers of water birds (especially geese, ducks and waders) during the migration periods and in winter. In summer, it supports important breeding populations of bittern *Botaurus stellaris*, marsh harrier *Circus aeruginosus*, avocet *Recurvirostra avosetta* and little tern *Sterna albifrons*.

Conservation objectives

15. Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:

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

Qualifying Features

- A021 *Botaurus stellaris*; Great bittern (Non-breeding)
- A021 *Botaurus stellaris*; Great bittern (Breeding)
- A048 *Tadorna tadorna*; Common shelduck (Non-breeding)
- A081 *Circus aeruginosus*; Eurasian marsh harrier (Breeding)
- A082 *Circus cyaneus*; Hen harrier (Non-breeding)
- A132 *Recurvirostra avosetta*; Pied avocet (Non-breeding)
- A132 *Recurvirostra avosetta*; Pied avocet (Breeding)
- A140 *Pluvialis apricaria*; European golden plover (Non-breeding)
- A143 *Calidris canutus*; Red knot (Non-breeding)
- A149 *Calidris alpina alpina*; Dunlin (Non-breeding)
- A151 *Philomachus pugnax*; Ruff (Non-breeding)
- A156 *Limosa limosa islandica*; Black-tailed godwit (Non-breeding)
- A157 *Limosa lapponica*; Bar-tailed godwit (Non-breeding)
- A162 *Tringa totanus*; Common redshank (Non-breeding)
- A195 *Sterna albifrons*; Little tern (Breeding)
- Waterbird assemblage

16. The Humber Estuary is an extremely dynamic estuarine system with a high sediment budget, which results in changing morphology, allowing the movement of the intertidal and subtidal habitats in response to physical and

biological variables. The habitats within the estuary are interdependent and inextricably linked to the structure and functioning of one another and of the system as a whole.

17. It is subject to the impacts of human activities (past and present) as well as ongoing processes such as sea level rise and climate change. Key issues include coastal squeeze, impacts on the sediment budget, and changes to geomorphological structure and function of the estuary (due to sea level rise, flood defence works, dredging, and the construction, operation and maintenance of ports, pipelines and other infrastructure), changes in water quality and flows, pressure from additional built development, and damage and disturbance arising from access, recreation and other activities.

Greater Wash SPA

18. The Greater Wash SPA covers circa 3,536km² and is located in the mid-southern North Sea between Bridlington Bay in the north and the Outer Thames Estuary SPA in the south. It is a marine site and protects important areas of sea used by water birds during the nonbreeding period, and for foraging terns in the breeding season. Breeding tern colonies along the coast are already protected by a number of existing classified SPAs: Humber Estuary, Gibraltar Point, North Norfolk Coast, Breydon Water and Great Yarmouth North Denes. The landward boundary of the site extends to the Mean High Water mark.

Conservation Objectives

19. The Conservation Objectives for the site are to ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features, and
- The distribution of the qualifying features within the site.

Qualifying Features:

- A001 *Gavia stellata*; Red-throated diver (Non-breeding);
- A065 *Melanitta nigra*; Common scoter (Non-breeding);
- A177 *Hydrocoloeus minutus*; Little gull (Non-breeding);
- A191 *Sterna sandvicensis*; Sandwich tern (Breeding);

- A193 *Sterna hirundo*; Common tern (Breeding); and
- A195 *Sternula albifrons*; Little tern (Breeding).

20. The Greater Wash SPA is a large, predominantly marine environment, and the East Lindsey coastline is very much on its periphery. This part of the Lincolnshire Coast is heavily populated with tourism development and there are already thousands of visitors to this part of the coast at any given point over the summer months.

Saltfleetby – Theddlethorpe Dunes and Gibraltar Point SAC

21. This collection of sites is protected as a good example of shifting dunes within a complex site that exhibits a range of dune types. Within this dune complex there are extensive areas of fixed dune vegetation within largely intact geomorphologically-active systems. The lime-rich dunes support a rich and diverse flora. The fixed dunes are part of a successional transition, and the rapidly-accreting dunes on the seaward sand bars and shingle banks make this an important site for research into the processes of coastal development.

Conservation Objectives

22. Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of the qualifying natural habitats;
- The structure and function (including typical species) of the qualifying natural habitats; and,
- The supporting processes on which the qualifying natural habitats rely.
- The population of each of the qualifying features, and
- The distribution of the qualifying features within the site.

Qualifying Features

- Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes");
- "Fixed coastal dunes with herbaceous vegetation ("grey dunes");
- Dunes with *Hippopha rhamnoides*; and
- Humid dune slacks

23. The site is subject to a high number of visitors which require close management as many of the vegetation types supported by sand dunes are fragile and vulnerable to erosion from heavy trampling. It may be necessary to take steps to manage activities in vulnerable areas. Where recreation pressure is not severe, the impact of trampling can help to retain diversity on some sites –

sandy tracks break up the vegetation sward and provide areas of bare sand thus increasing the diversity of habitats available.

Gibraltar Point SPA and Ramsar

24. Gibraltar Point SPA consists of an actively accreting sand-dune system, saltmarsh and extensive intertidal flats. All stages of dune development are represented with the older dunes extensively colonised by scrub. There are also small areas of freshwater marsh and open water. The site accommodates large numbers of overwintering birds and significant colonies of breeding terns. The terns feed outside the SPA in nearby waters. The site is also important for waders during the spring and autumn passage period.

25. Gibraltar Point is also a Ramsar site and was classified for breeding little tern and non-breeding bar-tailed godwit, sanderling and grey plover. These habitats provide important feeding and breeding sites for both birds and other wildlife. The coastal waters adjacent to the SPA provide a vital food source for the breeding tern populations by supporting large populations of small fish. The sand and shingle beaches in the SPA further support breeding little terns by providing important nesting areas.

26. Additionally, both extensive areas of intertidal mud and sand support high densities of marine invertebrates, such as mud snails, providing a food source for internationally important populations of wading birds. Saltmarsh also provides key feeding and roosting habitats for important bird species within the site. The site is important throughout the year; during the spring and autumn passage periods and over winter the site is used by bar-tailed godwit, sanderling and grey plover that use the site for feeding and roosting. During summer Gibraltar Point is used for breeding by little tern. As a Ramsar site, Gibraltar Point was designated on two criteria: criterion 1 the dune and saltmarsh habitats present on the site are representative of all the stages of colonisation and stabilisation, and criterion 2 it supports an assemblage of wetland invertebrate species of which eight species are listed as rare in the British Red Data Book and a further four species listed as vulnerable.

Conservation Objectives

27. Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features; and

- The distribution of the qualifying features within the site.

Qualifying Features:

- Bar-tailed godwit (*Limosa lapponica*), Non-breeding
- Grey plover (*Pluvialis squatarola*), Non-breeding
- Little tern (*Sternula albifrons*), Breeding
- Sanderling (*Calidris alba*), Non-breeding

28. This site is sensitive to erosion from heavy trampling and high levels of recreational pressures may require steps to manage access or control activities in vulnerable areas. It may also be necessary to manage access to limit the impacts of disturbance on breeding birds, for example for dog walking, bait digging etc. Saltmarsh change including coastal erosion can result from coastal flood-defence works, rising sea-levels, variations in sediment deposition, and land claim for development. The location and extent of mud or sand flats is dependent on the extent to which the estuary or coast where they occur is constrained from responding to sea level rise and changing sediment regimes.

The Wash and North Norfolk Coast SAC

29. The Wash and North Norfolk Coast SAC forms one of the most important marine areas in the UK and European North Sea coast. It includes extensive areas of varying, but predominantly sandy, sediments subject to a range of conditions. Communities in the intertidal area include those characterised by large numbers of polychaetes, bivalve and crustaceans. Subtidal communities cover a diverse range from the shallow to the deeper parts of the embayments and include dense brittlestar beds and areas of an abundant reef-building worm ('ross worm') *Sabellaria spinulosa*. The embayment supports a variety of mobile species, including a range of fish, otter *Lutra lutra* and common seal *Phoca vitulina*. The extensive intertidal flats provide ideal conditions for common seal breeding and hauling-out. Sandy sediments occupy most of the subtidal area, resulting in one of the largest expanses of subtidal sandbanks in the UK.

30. The subtidal sandbanks provide important nursery grounds for young commercial fish species, including plaice *Pleuronectes platessa*, cod *Gadus morhua* and sole *Solea solea*. The tide-swept approaches to the Wash include reefs which stand up to 30 cm proud of the seabed and which extend for hundreds of metres. The reefs are diverse and productive habitats which support many associated species that would not otherwise be found in predominantly sedimentary areas. Sandy flats predominate in the intertidal zone with some soft mudflats in the areas sheltered by barrier beaches and islands along the north Norfolk coast. The site contains the largest single area of saltmarsh in the UK and is one of the few areas in the UK where saltmarshes are generally accreting.

Conservation Objectives

31. Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- The extent and distribution of qualifying natural habitats and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats;
- The structure and function of the habitats of qualifying species;
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;
- The populations of qualifying species; and
- The distribution of qualifying species within the site.

Qualifying Features

- Coastal lagoons
- Embryonic shifting dunes
- Fixed dunes with herbaceous vegetation ("Grey dunes")
- Humid dune slacks
- Mediterranean and thermo-Atlantic halophilous scrubs (*Sarcocornetea fruticosi*)
- Otter (*Lutra lutra*)
- Perennial vegetation of stony banks
- Petalwort (*Petalophyllum ralfsii*)
- Shifting dunes along the shoreline with *Ammophila arenaria* ("White dunes")

32. The site is vulnerable to natural sea level rise, storm surges and changes in erosion patterns which are increasingly likely to affect the freshwater grazing marsh and reed bed habitats. Increasing interest in abstraction of groundwater for irrigation of arable land may affect freshwater spring flows onto grazing marshes and would be addressed through application of provisions under the Habitat Regulations. The site is visited by a large number of tourists especially in the summer.

The Wash SPA and Ramsar

33. The Wash is the largest estuarine system in the UK and comprises very extensive saltmarshes, major intertidal banks of sand and mud, shallow waters and deep channels. The sheltered nature of The Wash creates suitable breeding conditions for shellfish which are important food sources for some water birds. The Wash is of outstanding importance for a large number of geese, ducks and waders, both in spring and autumn migration periods, as well as through the winter. The SPA is especially notable for supporting a very large proportion (over

half) of the total population of Canada/Greenland breeding Knot *Calidris canutus islandica*. In summer, the Wash is an important breeding area for terns and as a feeding area for Marsh Harrier *Circus aeruginosus* that breed just outside the SPA. To the north, the coastal habitats of The Wash are continuous with Gibraltar Point SPA, whilst to the east The Wash adjoins the North Norfolk Coast SPA.

Conservation Objectives

34. The objectives are to ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:

- the extent and distribution of the habitats of the qualifying features;
- the structure and function of the habitats of the qualifying features;
- the supporting processes on which the habitats of the qualifying features rely;
- the populations of the qualifying features; and
- the distribution of the qualifying features within the site.

Qualifying Features

- Bar-tailed godwit (*Limosa lapponica*), Non-breeding
- Bewick's swan (*Cygnus columbianus bewickii*), Non-breeding
- Black-tailed godwit (*Limosa limosa islandica*), Non-breeding
- Common scoter (*Melanitta nigra*), Non-breeding
- Common tern (*Sterna hirundo*), Breeding
- Curlew (*Numenius arquata*), Non-breeding
- Dark-bellied brent goose (*Branta bernicla bernicla*), Non-breeding
- Dunlin (*Calidris alpina alpina*), Non-breeding
- Gadwall (*Mareca strepera*), Non-breeding
- Goldeneye (*Bucephala clangula*), Non-breeding
- Grey plover (*Pluvialis squatarola*), Non-breeding
- Knot (*Calidris canutus*), Non-breeding
- Little tern (*Sternula albifrons*), Breeding
- Oystercatcher (*Haematopus ostralegus*), Non-breeding
- Pink-footed goose (*Anser brachyrhynchus*), Non-breeding
- Pintail (*Anas acuta*), Non-breeding
- Redshank (*Tringa totanus*), Non-breeding
- Sanderling (*Calidris alba*), Non-breeding
- Shelduck (*Tadorna tadorna*), Non-breeding
- Turnstone (*Arenaria interpres*), Non-breeding
- Waterbird assemblage, Non-breeding
- Wigeon (*Mareca penelope*), Non-breeding

35. The biological richness of The Wash is largely dependent on the physical processes. The intertidal zone is vulnerable to coastal squeeze as a result of land-claim, coastal defence works, sea-level rise, and storm surges. Intertidal habitats are potentially affected by changes in sediment budget caused by dredging and coastal protection, construction of river training walls and flood defence works. The volume and quality of water entering The Wash is dependent on the use made of the surrounding rivers for water abstraction and agricultural and domestic effluents – such consents and licenses are managed under the provisions of the Habitats Regulations.

Test of Likely Effects

Identify the potential effects on the European site

36. Before starting to assess the site areas it should be noted that there is a difficulty in understanding what aspects of the LDO will be utilised, to what extent and in what locations. For many different reasons, not all caravan site owners may wish to utilise the LDO. The LDO only relates to planning permission, and caravan owners and operators will still need to obtain an appropriate licence. The site licence does not form part of the LDO, it is a separate process, and caravan site owners will have to apply for an amendment to a current licence to take up longer periods of occupancy. There are different requirements for winter occupation and this may influence take up of the LDO, both in terms of those seeking to extend the season. Whether or not the decision is taken to extend the season may also influence decisions on whether or not to make additional investment in services and facilities on the sites under other parts of the LDO. The provisions of the LDO may mean that planning permission is no longer required for any work needed to make the site compliant with licencing conditions but work will still need to be carried out and, currently, the LDO only grants an extension of the site occupancy period for two years.

37. As a HRA has to have some indication of the magnitude of what is being assessed, in order to carry out the assessment, this take up of the opportunities under the LDO has been taken into consideration in estimating the scale of what may come forward under the LDO. This is can only be viewed as an approximation of what may come forward and in no way predetermines the site licencing process.

38. The LDO also includes a buffer area around the European Protected Sites, which are the subject of this HRA. No Development listed in Part 2 of the LDO, can take place within this buffer area. This will, in some cases, reduce the number of sites that can take advantage of that particular part of the LDO and, on sites that straddle the buffer line, may move development further from the European site, thus reducing the direct impacts. However, much depends on where that development will take place.

39. The assessment of likely effects will look at spatial groups of caravan sites along the coast and then look at the potential for cumulative effects at the end.

North Somercotes

40. There is a cluster of caravan sites at North Somercotes comprised of the large Lakeside Park, along with the smaller Oasis Lakes and, further inland, Brickyard Fisheries. The majority of Lakeside Park is likely be able to meet the winter licence conditions, although the touring site may not as it does not appear to have the hardened surroundings for all the pitches or lighting required. Oasis Lakes and Brickyard Fisheries would not meet the conditions without significant infrastructure provision.

41. There are approximately 460 static caravan pitches at Lakeside Park. The site is 825m from Humber Estuary SAC, SPA and Ramsar Site, and Greater Wash SPA. There is no direct access from the site in that area through rights of way or road access. The closest access point is Howden's Pullover, which is 2.3km by road to the South East and Donna Nook is 4.7km by road to the North West.

42. Based on an average of 4 occupants per static caravan, Lakeside Park could accommodate 1840 people on the site, which is a similar population to the nearby village of North Somercotes. The Humber Estuary designations cover both terrestrial and marine designations and cover a wide range of qualifying features; these are detailed elsewhere in his report.

43. The change to the occupancy of caravans means that the coastal areas will potentially be exposed to some increased visitor activity during the winter months including trampling of the dune features and increased numbers of walkers on the beach and intertidal habitat which hosts a number of the species which underpin the designation of the Humber as an SPA and Ramsar Site. The SAC is designated in part due to the presence of the colony of breeding grey seals that are present at Donna Nook and visitor penetration is already strictly controlled during those periods. However, the current occupancy on the site runs from 1st March to 5th January. As the seals arrive at the end of October and have largely departed by the middle of January, this should have no additional impact on visitor numbers in this area.

44. As the site lies over 800m outside the designated areas, and with no direct access, it is considered that there will be no direct impact on the sites from any additional building or intensification of use within the site boundaries. There may be some additional visitors using the beach area for recreation but as this will require a journey, by car or on foot, and as the occupancy period will only be extended by 2 months, it is not felt this will lead to a significant increase in the number of visitors using the site. Therefore, there is no likely significant effects from the LDO.

Saltfleet

45. Although the cluster of caravans at Saltfleet is made up of a number of different sites, it appears as one homogeneous group of caravans. The sites are all within 300m of the Humber Estuary SAC, SPA and Ramsar site and Greater Wash SPA so would not be able to carry out new development under the LDO but would be able to extend the season.

46. Between them, the sites have capacity for 1020 static caravans and approximately 40 touring caravans. This would provide accommodation for approximately 4,160 people. However, none of the caravan sites currently have all the requirements in place to enable them to be licenced for winter occupation. The reasons vary between sites and some would be easy to address, although some could require reorganising of some caravan pitches. It is unlikely that this will happen with every site. However, it is a possibility that site owners would deem that the demand generated from all year round use of the site would be worth the investment. The largest site in the cluster accommodates almost half of the static caravans and its caravans are privately owned so there may be some aspiration here to allow its owners to visit their caravans during the winter.

47. All the sites are within 300m of the SAC, SPA and Ramsar sites, the southern extent of the cluster is also on the edge of the 300m buffer round the Saltfleetby – Theddlethorpe Dunes and Gibraltar Point SAC. All caravan sites have access to the beach and dunes via the pullover at the end of Sea Lane, and the New Inn Caravan site has direct access through the dunes and on to the beach.

48. The caravan sites in this area are currently able to open from March until either the end of October or the end of November. The Humber Estuary SAC is designated, in part, due to the breeding population of grey seals which are present in the estuary throughout the year but which arrive on the coast, in the vicinity of Donna Nook, in late October to have their pups and breed. The seals stay on the beach until January. Visiting the seals has become a significant tourist attraction. The viewing area for the seals is approx. 8km by road from the sites at Saltfleet, or a walk along the beach of approx. 6.7km. Given that people travel from all over the country, even internationally, to Donna Nook to witness the seals, it is a reasonable assumption that winter visitors to the caravan sites would also wish to experience this. The number of visitors to Donna Nook fluctuates, often as a result of the weather as the site is very exposed. However, an evaluation report prepared by the Lincolnshire Wildlife Trust in respect of a Heritage Lottery Fund Project (EVALUATION REPORT FOR HERITAGE LOTTERY FUND DONNA NOOK - SEE THE SEALS SAFELY YH-11-07041 LINCOLNSHIRE WILDLIFE TRUST 2016) indicates that between 60 and 70,000 visitors are drawn to visit the seals each year during the time that they are on site. The weekends are by far the busiest time, receiving up to three times the visitors of a typical weekday, with 4,692 people visiting the site on a peak Sunday in 2015. The report goes on to say that, provided visitors stay behind

the fencing and do not encroach onto the beach area, when the seals can become very distressed (and is a danger for the public), "the seals appear largely unaffected by the presence of so many people". There is no indication that the additional visitors that may be generated by the nearby caravan sites would have likely significant effects on this qualifying species. However, the Humber SAC is also designated for its dunes, mudflats and sand flats (see above) and the species they support. Indeed the project which was the subject of the Lincolnshire Wildlife Trust evaluation report was as a result of a need to protect the dunes from the high visitor numbers at Donna Nook. However, sound management practices have been put in place to address this.

49. The Humber and Lincolnshire Coastline are also designated as a SPA and Ramsar site, see above. These designations relate primarily to birdlife on the estuary, a significant proportion of which are over wintering birds. The area around Saltfleet is noted for the Bar-tailed godwit which uses the mudflats as well as the saltmarsh and coastal lagoons for roosting and feeding, as does the Dunlin. This area is also of particular importance in supporting an assemblage of species including oystercatchers and curlew. Nearby, at Saltfleeby, is an important winter roost site for the Hen Harrier which uses the saltmarsh and reedbeds for roosting and hunting as well as other areas such as arable fields, rough grass, and uncultivated areas along drainage ditches.

50. Many of the vegetation types supported by sand dunes are fragile and vulnerable to erosion from heavy trampling. However, this is a year round issue and not restricted to the winter period. Access points are limited in this area and already set up to deal with the summer pressure. Visitor numbers are likely to be significantly lower in the November to February period that will be permitted through the LDO due to the different weather conditions. As many of the bird species in the areas are winter visitors, extending the season to increase the number of visitors using the coast, could have an impact. However, the public rights of way network in this area is not extensive, so access to the saltmarsh and surrounding arable fields is limited. Also, the intertidal habitat that is used for feeding is very extensive and it is not considered that the number of visitors walking on the beach will of such a magnitude that they will have a significant effect on the qualifying species in this area.

Mablethorpe North End

51. There is a cluster of sites at Mablethorpe North End with the capacity for approximately 1376 static caravans and 205 touring caravans and tents. This would provide accommodation for 5914 people. Current occupancy conditions in this area allow cover the period between March and the end of October or November. Not all of the caravan sites currently have all the requirements in place to enable them to be licenced for winter occupation. The reasons vary between sites and some would be easy to address, and others could require reorganising some caravan pitches to address them. It is unlikely that this will

happen with every site, however, it is a possibility that site owners would deem that the demand generated from all year round use of the site would be worth the investment. Some of the sites have privately owned caravans so there may be some aspiration here to allow its owners to visit their caravans during the winter. Some of the other sites could satisfy winter demand by accommodating visitors in the units that are better able to meet the licencing requirements, without having to carry out much additional work. Touring caravan pitches in this area would all require additional infrastructure. It would seem reasonable to expect that, even without any additional work or small changes, around 50% of the static caravans could meet the licensing requirements and be available for winter occupancy; meaning up to 3,000 additional winter bed spaces.

52. Almost all of the sites are just outside the 300m buffer zone for the Greater Wash SPA, so could take advantage of the ability to create new development on at least part of their site. Part of one of the sites abuts the Humber Estuary SPA and Ramsar site, as well as the Saltfleetby – Theddlethorpe Dunes and Gibraltar Point SAC, and all of that sites and almost all of one other, are within the 300m buffer of those sites. The main beach access at North End also runs along the southern boundary of these European designated sites.

53. The Greater Wash SPA and Humber Estuary SPA and Ramsar designations, see above, relate primarily to birdlife on the estuary, a significant proportion of which are over wintering birds. The Saltfleetby – Theddlethorpe Dunes and Gibraltar Point SAC is designated for its dune systems. Many of the vegetation types supported by sand dunes are fragile and vulnerable to erosion from heavy trampling. However, this is a year round issue and not restricted to the winter period. Access points are already set up to deal with the summer visitor pressure. Visitor numbers are likely to be significantly lower in the November/December to February period that will be permitted through the LDO, and use of the beach lower due to the weather conditions. As many of the bird species in the areas are winter visitors, extending the season to increase the number of visitors using the coast, could have an impact. However, incursion into the dunes is likely to be limited away from the access points, and the intertidal habitat that is used for feeding is very extensive and it is not considered that the number of visitors walking on the beach will be of such a magnitude that they will have a significant effect on the qualifying species in this area. Built development coming forward within the sites, as a result of the LDO, may attract more visitors to the site, however, it is not considered that, in themselves, they will have a direct impact on the qualifying features of the designated areas. In this part of the coast, it is considered that the LDO will not lead to significant effect on the sites.

54. In addition, there are large caravan sites inland, but within the coastal area. Some of the caravans on one of the sites already has all year round occupancy, the remainder has occupancy condition of 1st March to 30th November. Another site has occupancy from 1st March to 5th January.

Additional numbers may add to visitors to the beach, but these visitors will be required to travel into Mablethorpe by car for this and it is felt that the additional numbers using the beach in that 3 month period will not add significantly to pressure on the qualifying species.

Trusthorpe and Sutton on Sea

55. The next cluster of caravans along the coast is from the southern end of Mablethorpe to Sutton on Sea. In this area there is capacity for 2,434 static caravans and 226 touring caravans; equating to approximately 10,180 visitors. Currently, the occupancy conditions in this part of the coast vary with around 400 caravans having occupancy from 1st March to 5th January and the remainder having occupancy conditions from 1st March to with 31st October or 30th November.

56. Few of the caravan sites currently have all the requirements in place to enable them to be licenced for winter occupation. The reasons vary between sites but in some cases minor changes would be needed and in other this could be addressed by reorganising some caravan pitches. It is unlikely that this will happen with every site, however, it is a possibility that site owners would deem that the demand generated from all year round use of the site would be worth the investment. Some of the sites have privately owned caravans so there may be some aspiration here to allow its owners to visit their caravans during the winter. Some of the other sites could satisfy winter demand by accommodating visitors in the units that are better able to meet the licencing requirements, without having to carry out much additional work.

57. None of the touring caravan sites in this area currently have infrastructure necessary to meet the licensing conditions. It would seem reasonable to expect that, even without additional work, around 50% of the static caravans could meet the licensing requirements and be available for winter occupancy; meaning up to 1,300 caravans and 5,200 additional winter bed spaces.

58. Four of these site are within 300m of the Greater Wash SPA, so would not be able to carry out new development under the LDO but would be able to extend the season. The Greater Wash is protected for three species of non-breeding birds and three species of breeding birds. Data for the non-breeding species shows that they are present in the winter months as either part of their migratory passage or overwintering. However, these species tend be present off shore and, where they do reach the shore, tend to occupy areas further south. The breeding species are present in the summer months. There are 10 access point directly onto the beach in this part of the coastline, distributing caravan occupants quite evenly along the extent of the beach.

59. Visitor numbers are likely to be significantly lower in the November/December to February period, as permitted through the LDO, and use of the beach lower due to the weather conditions. As many of the bird species in

the areas are winter visitors, extending the season to increase the number of visitors using the coast, could have an impact. However, given the nature of the species that are qualifying features for the SPA, the number of visitors using the beach and the distribution of the points of access to the beach, it is not felt that any conflict presented by visitors will be of such a magnitude that they will have a significant effect on the qualifying species in this area. Built development coming forward within the sites, as a result of the LDO, may attract more visitors to the site, however, it is not considered that, in themselves they will have a direct impact on the qualifying features of the Greater Wash SPA. In this part of the coast, it is not considered that the LDO will lead to significant effect on the sites.

South of Sutton on Sea and Sandilands to north of Anderby

60. Between the south sides of Sutton on Sea/Sandilands to north of Anderby, there is a scattering of caravan sites, mainly for touring caravans. The sites have capacity for 80 static caravans and 367 tourers; with potential for approximately 1,054 visitors. All the sites are more than 300m from the Greater Wash SPA. Most of the sites are not capable of meeting the site licence requirements without adding additional infrastructure; although one would not need a lot of changes to take it to the required standard. Given that all these sites are over 1km from the beach, and contain a low number of caravans which are mainly tourers, it is considered that they will not generate a large number additional winter visitors. There may be some development coming forward in the form of ancillary buildings. However, all of these sites are quite small and, for that reason, any ancillary buildings will also be relatively small. It is therefore considered that the LDO will not lead to significant effect on the Greater Wash SPA.

Anderby Creek and Anderby

61. Anderby Creek has a large grouping of caravan sites, made up of a number of different sites but with capacity for 511 static caravans (2,044 visitors) across them. One of the sites is completely within 300m of the Greater Wash SPA and half of another site is also within 300m. The areas within the 300m will not be able to take advantage of the built development aspects of the LDO, although the option to extend the season is open to them. None of the sites would currently meet the standard for winter caravan site occupancy. The reasons vary between sites, but in some cases minor changes would be needed and in others this could be resolved by reorganising pitches. All but one of the sites have occupancy conditions to the end of October, the other is the end of November; so extending the season by 3 or 4 months. It is unlikely that every site will wish to make the improvements to enable all year occupancy. However, it is a possibility that some site owners would deem that the demand generated from all year round use of the site would be worth the investment. Looking at the work that would be needed for the sites, it again seems to reasonable to

assume that around 50% may choose to do this, meaning around 250 static caravans (potentially 1,000 visitors).

62. In addition, there are further touring caravan sites at Anderby and further inland (within the Coastal Zone), which have capacity for 200 caravans and tents (approximately 400 visitors). However, none of these sites would meet the criteria for winter site licences as they are all grass pitches. A considerable amount of infrastructure would be needed to meet the licence requirements.

63. There is one main visitor access point directly onto the beach in this part of the coastline, although there are others further along the coast that some visitors may choose to use, particularly those that had already got in their car to access the coast from inland. The qualifying features for the Greater Wash are three species of non-breeding birds and three species of breeding birds. Data for the non-breeding species shows that they are present in the winter months as either part of their migratory passage or overwintering. However, these species tend to be present off shore and, where they do reach the shore, tend to occupy areas further south. The breeding species are present in the summer months. Visitor numbers are likely to be significantly lower in the November/December to February period that will be permitted through the LDO, and use of the beach lower due to the weather conditions. As many of the bird species in the areas are winter visitors, extending the season to increase the number of visitors using the coast, could have an impact.

64. However, given the nature of the species that are qualifying features for the SPA, and the reduced numbers of visitors using the beach, it is not felt that any conflict presented by visitors will be of such a magnitude that they will have a significant effect on the qualifying species in this area. The sites in this area are, individually, not large and any built development coming forward through the LDO will likewise be small in nature. In this part of the coast, it is not considered that the LDO will lead to significant effect on the sites.

Chapel St Leonards, Ingoldmells and Skegness

65. The largest concentration of caravans along the coast is at Chapel St Leonards/Ingoldmells/Skegness. Although there are many individual sites here, the majority of them form an almost continual line of development from north of Chapel St Leonards to Skegness, so cannot be subdivided. Some of these sites fall wholly or partly within the 300m buffer of the European designated sites and would not be eligible for that part of the LDO relating to new development or change of use of buildings on the site within that area. However, the majority of sites are outside it, and some of them are some distance inland. Sites along the coastline in this area are often large in size and although it may require a loss in caravan pitches to create space for new development, owners may wish to enhance the visitor experience in the winter by adding new services and facilities; especially given the inclemency of the weather over the November/December to February period. However, any effects from new

building on the sites would be felt all year. The range of potential uses of building on site is very broad. Some may require an increase in water usage, all are likely to increase demand for electricity and waste disposal. However, direct impacts on the Greater Wash SPA are likely to be limited.

66. All the caravan sites would have the option of all year round occupancy. There is current capacity for 20,733 static caravans and 3,877 tourers or tents along this stretch of the coastline, providing capacity for in the region of 90,686 visitors. (These figures including planning permissions that have started on site, even if they are not yet completed as they will become so within the life of the LDO). Most sites have an occupancy period of beginning or mid-March to the end of October or November. In a few cases all or part of a site can be occupied until 5th January. As with other parts of the coast, not all of these sites will currently meet the site licence requirements for winter occupation or will wish to pursue this. Looking at which sites currently meet the criteria, or could meet them with some minor alterations to the site, it is estimated that sites containing in the region of 13,000 static caravans and 1,700 touring caravans (approximately 55,400 visitors) could, in the short term, implement the extended season under the LDO.

67. The qualifying features for the Greater Wash are three species of non-breeding birds and three species of breeding birds. Data for the non-breeding species shows that they are present in the winter months as either part of their migratory passage or overwintering. However, these species tend to be present off shore and, where they do reach the shore, tend to occupy areas further south. Of the non-breeding qualifying species, this part of the coast is at the outer reaches of the Common Scooter's distribution, but numbers are very small in this area. The breeding species are present in the summer months.

68. There are dozens of access points directly onto the beach in this part of the coastline, potentially distributing caravan occupants along the extent of the beach. Visitor numbers are likely to be significantly lower in the November/December to February period, as permitted through the LDO, and use of the beach lower due to the weather conditions. As many of the bird species in the areas are winter visitors, extending the season to increase the number of visitors using the coast, could have an impact. However, given the nature of the species that are qualifying features for the SPA, the number of visitors using the beach and the distribution of the points of access to the beach, it is not felt that any conflict presented by visitors will be of such a magnitude that they will have a significant effect on the qualifying species in this area. Built development coming forward within the sites may attract more visitors to individual sites, however, it is not considered that, in themselves they will have a direct impact on the qualifying features of the Greater Wash SPA. In this part of the coast, it is not considered that the LDO will lead to significant effect on the sites.

South of Skegness

69. South of Skegness there are a number of caravan sites either in small groups or sitting on their own. A few of the sites are located along the A52, and these are around 3kms from the European designated sites. The remainder of the sites are further inland. There is capacity for 758 static caravans and 335 touring caravans, so around 3,700 visitors, in this part of the coast. All sites could carry out new development of services and facilities under the LDO, however, all of these sites are quite small and, for that reason, any ancillary buildings will also be relatively small. It is therefore considered unlikely to lead to significant effect on the European designations.

70. Most sites have an occupancy period of beginning or mid-March to the end of October or November. In a few cases all or part of a site can be occupied until 5th January and all could consider taking up the extended season offered by the LDO. However, some of the sites are located in the more rural parts of the coast and do not have the benefit of mains drainage, which is part of the requirement for a caravan licence for all year round occupancy. However, there still remain around 250 static caravans, and a much smaller number of touring caravans, that either meet the winter licencing conditions or would be able to meet them relatively easily. Adding 1,000 additional winter visitors in this part of the coast.

71. The international designations along this part of the coast are made up of the Greater Wash SPA, Gibraltar Point SPA and Ramsar Site, The Wash SPA and Ramsar Site, Saltfleetby – Theddlethorpe Dunes and Gibraltar Point SAC, The Wash and North Norfolk Coast SAC.

72. The Greater Wash SPA extends along the majority of the Lincolnshire coast, finishing at Gibraltar Point in the south. It has qualifying features made up of three species of non-breeding birds and three species of breeding birds. Data for the non-breeding species shows that they are present in the winter months as either part of their migratory passage or overwintering. These species are largely present off shore and, where they do reach the shore, they are in small clusters. In the case of one species in the range of 10.52 – 14.83 birds per km² around Skegness, including Gibraltar Point. The breeding species are present in the summer months.

73. Gibraltar Point SPA and Ramsar site have a number of bird species as qualifying features. Most of these are non-breeding, with 1 breeding. The breeding season is during the summer months (April – July). However, the five non-breeding species will be present in the winter months. Most of the species use the area for foraging, mainly in the intertidal area. One of the species has overwintering roosts at Gibraltar Point between the dunes and saltmarsh. Disturbance from visitors could present a threat.

74. The Wash SPA and Ramsar sites contain a large number of qualifying bird species. For the breeding species, this takes place in the summer months so is

unlikely to be affected by the LDO. One species of bird is present during its migration but this takes place outside of the period that the caravan sites would be looking to extend into. Some of the species are more prevalent off shore, or in other parts of the Wash, or use the area for foraging, this includes surrounding fields. Two species have also been identified as having developed saltmarsh roosts in areas along the coast, although these are away from the main access point at Gibraltar Point.

75. The qualifying features for the Wash SAC relate to the land based biodiversity of the area: Atlantic salt meadows; Coastal lagoons; Large shallow inlets and bays; Mediterranean and thermo-Atlantic halophilous scrubs; Mudflats and sand flats not covered by seawater at low tide; Reefs; Salicornia and other annuals colonising mud and sand; Sandbanks which are slightly covered by sea water all the time – as well as Harbour (common) seal and Otter.

76. Similarly, the qualifying features of the Saltfleetby – Theddlethorpe Dunes and Gibraltar Point SAC are also land based: Embryonic shifting dunes; Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes"); Fixed coastal dunes with herbaceous vegetation ("grey dunes"); Dunes with *Hippophora rhamnoides*; Humid dune slacks.

77. The site sensitivities of these designations include the number of visitors to the sites and this requires close management as many of the vegetation types supported by sand dunes are fragile and vulnerable to erosion from heavy trampling.

78. Given the distance from the designated sites, the risk of direct effects on the site from Development through the LDO is considered minimal. The potential risk comes from the increased number of visitors to the area. There is limited public access (road or public right of way) in this part of the coastline, so most visitors will access the designated area through Gibraltar Point. Given the distances needed to travel, and the prevailing weather conditions over the winter period (November to February) these would be visitors who had chosen to take a special trip to access the wild coast and therefore, it is not considered that additional numbers will be significant. Management of visitors at Gibraltar Point is already a fundamental part of the way the site operates and it is not considered that any winter visitors to the caravan sites from this part of the coast will add significantly to that. Given this, and the distribution of the qualifying features across the designated areas, it is considered not that there would be a significant effect.

Cumulative Effects

79. Each section of the coast has been assessed on the likely effects it would have on the European designation/s that is located closest to. No significant effects have been found. Across the coast, the potential for an increase in visitors is significant, however, this has to be tempered with the fact that the winter months are unlikely to attract the same number of visitors as the summer. This is for a number of reasons, firstly, there are extended periods of school holidays in these three months, and secondly, the beach based focus of summer holidays will not have such a strong pull due to the prevailing weather conditions. The winter period may attract a different holiday maker, seeking to experience the wild coast but it is not considered that these numbers will match the peak of summer visitors. The areas designated for their terrestrial qualifying features have already been adapted to manage the high numbers of visitors along the coast in the summer months. In addition, the winter visiting species that represent the qualifying features along the coast are largely present off shore. Where they do reach the shore, they largely occupy areas that are already specifically and carefully managed for this purpose; such as Donna Nook, Saltfleeby – Theddlethorpe Dunes and Gibraltar Point – which are all National Nature Reserves.