



Overstrand Urgent Works Habitats Regulations Assessment (HRA) - Screening and Appropriate Assessment

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This report describes work commissioned by Norfolk District Council, by an instruction dated 29th October 2025. The Client's representative for the contract was Tamzen Pope of Norfolk District Council. Steven Heathcote and Fiona Parkinson of JBA Consulting carried out this work.

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A Current Concept Site Plan

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Abbreviations

ECJ	European Court of Justice
HRA	Habitats Regulations Assessment
SAC	Special Area of Conservation
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest

1 Introduction

1.1 Purpose of this Report

The report has been produced by JBA Consulting on behalf of North Norfolk District Council ('the Applicant') to support the design and build of a new steel sheet piled concrete apron to encase the lower portion of the existing seawall at Overstrand located near to Cromer on the North Norfolk Coast approximately 35km north-east of Norwich. The aim is that this will future proof the existing foundations.

This Habitats Regulations Assessment (HRA) document provides North Norfolk District Council, the Competent Authority, information to assist in their consideration of whether the proposed scheme will have likely significant effects on European Sites. Natural England, as the relevant statutory nature conservation body, will be consulted as to whether they agree with the conclusions of this assessment.

1.2 Background

The seafront at Overstrand is a c. 700m section of concrete sea defences between stretches of natural soft cliff. The concrete sea defences are at the base of areas of soft cliff with intertidal beach present immediately below the concrete. The proposed works is to repair undermining of the seawall causing at least two major (reflective) fractures from top to bottom due to drops in beach levels. The steel sheet piles which form the base of the seawall have become severely degraded, and in places the sea has penetrated through the corroded sheets undermining the structure above. The encasement will cover the full extent of the undermined seawall in two locations spanning approximately 170 metres at the east end and 120 metres at the west end. The design life should be between 10-20 years.

The proposed development is located within the Greater Wash Special Protection Area (SPA) and approximately 20m from Overstrand Cliffs Special Area of Conservation (SAC).

1.3 Legislative Context

The Conservation of Habitats and Species Regulations 2017 (as amended by the Conservation of Habitats and Species (amendment) (EU Exit) Regulations 2019), also known as the 'Habitats Regulations', provide legal protection to habitats and species of national importance. The regulations also secure an ecological network of protected sites, consisting of SACs and SPAs. Government guidance also requires that Ramsar sites (which support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance [Ramsar Convention]) are given the same level of protection as SACs and SPAs.

Prior to the UK's withdrawal from the EU, SACs were designated and protected under domestic legislation transposed from European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (Habitats Directive), and SPAs under European Directive 2009/147/EC on the Conservation of Wild Birds (Birds Directive). Together these

sites formed a European-wide Natura 2000 network of protected sites. Since 31 December 2020, SACs and SPAs within the UK no longer fall within the Natura 2000 network and instead form a National Site Network. SPAs and SACs continue to be referred to collectively as 'European sites' within the context of the Habitats Regulations, reflecting their international importance for the conservation of biodiversity.

SACs and SPAs within the National Site Network are also still designated for habitats listed on Annex I and for species listed on Annex II of the Habitats Directive, and criteria listed under the Birds Directive, and it is these Annex I habitats, Annex II species and Birds Directive Criteria against which assessments under the Habitats Regulations are still made.

Regulation 63 of the Habitats Regulations states that "A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project 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 that site, must make an appropriate assessment of the implications of the plan or project for that site in view of that site's conservation objectives." This process is commonly referred to as Habitats Regulations Assessment (HRA).

1.3 Appropriate Assessment Adoption Process and the Competent Authority

This assessment has been produced by JBA Consulting acting on behalf of North Norfolk District Council and as such constitutes a 'Shadow Habitat Regulations Assessment'. The Council are a public body and are able to act as the Competent Authority for the works but would need to formally adopt this assessment as their own.

2 Habitats Regulations Assessment Methods

2.1 Overview

HRA follows a three-stage process as outlined in government guidance (UK Government, 2026) and summarised in Table 2-1. This report provides evidence to support Stage 1 and Stage 2 of the HRA process, to provide the Competent Authority(s) with information to make their assessment.

Table 2-1: The HRA Process

HRA Stage	Description
Stage 1: Screening	<p>This process identifies the likely significant effects upon a European site of a project or plan, either alone or in-combination with other projects or plans and determines whether these impacts are likely to be significant.</p> <p>Following the ECJ judgement in the case of “people over wind” (Case C-323/17). Measures that are necessary to avoid or reduce impacts on the European site, even when considered standard environmental best-practice, can only be assessed at Stage 2.</p> <p>If no likely significant effect is determined, the project or plan can proceed. If a likely significant effect is identified, Stage 2 is commenced.</p>
Stage 2: Appropriate Assessment	<p>Stage 2 is subsequent to the identification of likely significant effects upon a European site in Stage 1. This assessment determines whether a project or plan would have an adverse impact on the integrity of a European site, either alone or in-combination with other projects or plans.</p> <p>If no adverse impact on site integrity is determined, the project or plan can proceed. If an adverse impact is identified, Stage 3 is commenced.</p>
Stage 3: Derogations	<p>Where a plan or project has been found to have adverse impacts on the integrity of a European site it may be granted an exemption, known as a derogation, if it fulfils certain criteria.</p>

2.2 Guidance

The methodology used for this assessment is based on guidance on the government website (UK Government, 2026). In addition, the following guidance documents were also consulted:

- European Commission Notice: Managing Natura 2000 sites. The Provisions of Article 6 of the ‘Habitats’ Directive 92/43/EEC (EC, 2018)
- UK Government Guidance on Habitats Regulations Assessment (UK Government, 2026).

- Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission 2002)
- Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC (European Communities, 2007)
- The National Planning Policy Framework and National Planning Practice Guidance
- The Planning Inspectorate PINS Note 05/ 2018: Consideration of avoidance and reduction measures in Habitats Regulations Assessment: People over Wind, Peter Sweetman, v Coillte Teoranta (The Planning Inspectorate, 2018)

2.3 HRA Stage 1: Screening Methodology

The principles of 'screening' are applied to a project and its components to allow the assessment stage to focus on those aspects that are most likely to have potentially significant or adverse effects on European sites. Screening aims to determine whether the project will have any 'likely significant effects' on any European site as a result of its implementation. It is intended to be a coarse filter for identifying effects (positive and negative) that may occur, to allow the assessment stage to focus on the most important aspects. A project should be considered 'likely' to have an effect if it is not possible (on the basis of objective information) to exclude the likelihood that the project could have significant effects on any European site, either alone or in-combination with other plans or projects; an effect will be 'significant' if it could undermine the site's conservation objectives.

Screening can be used to 'screen-out' European sites and project components from further assessment, if it is possible to determine that significant effects are unlikely (e.g. if sites or interest features are clearly not vulnerable (exposed and/or sensitive) to the outcomes of a project due to the absence of any reasonable impact pathways).

To undertake the screening of the proposed sea wall repairs, it is necessary to:

- Identify the European site(s) likely to be affected by the project, reasons for their designation and their conservation objectives.
- Describe the project and identify the potential impact pathways/effects on the European site(s).
- Identify any other plans or projects that could act in-combination
- Assess the significance of these potential impacts pathways/effects on the European site(s).

2.3.1 The Precautionary Principle

If there is uncertainty, and it is not possible, based on the information available, to confidently determine no significant effects on a site then the precautionary principle will be applied, and the project will be subject to an appropriate assessment.

2.3.2 Mitigation, Avoidance and Protective Measures

Following the *People over Wind & Sweetman v Coillte Teoranta* Case C-323/17, the assessment does not consider protective, avoidance or mitigation measures that are not integral to the design or standard methodology for stage 1 Screening. These measures are carried forward and considered as part of the stage 2 Appropriate Assessment.

2.4 Stage 2: Appropriate Assessment

The Appropriate Assessment involved a detailed consideration of the potential impacts of the project on the integrity of the relevant European site(s), with reference to their conservation objectives and site-specific vulnerabilities. This was used to determine whether the project will adversely affect the integrity of any site, either alone or in combination with other plans or projects. In this assessment, following consideration of the possible pathways and magnitude of impact, avoidance or mitigation measures were applied and the effects re-assessed. This process was carried out iteratively until necessary and sufficient measures have been applied until either no significant impact on site integrity can be demonstrated beyond reasonable scientific doubt, or it is clear that an adverse effect on integrity could not be avoided. If sufficient avoidance or mitigation measures cannot be applied, the project would have to proceed to subsequent stages including a demonstration of no satisfactory alternatives and reasons of overriding public interest.

2.5 Personnel

The assessment was undertaken by Assistant Ecologist Fiona Parkinson BSc (Hons) PGCE and Principal Ecologist Steven Heathcote BA (Hons) DPhil CEcol MCIEEM and reviewed by Senior Ecologist Catherine Porter BSc (Hons) MSc MCIEEM of JBA Consulting.

2.6 Assumptions and limitations

Information on the works and conditions on site are based on current knowledge at the time of writing. The assessment of in-combination effects is based on published documentation available at the time of writing this report.

The field survey was carried out in December. The habitats present on site are all recognisable over winter, and could be mapped accurately, but some species are likely to have died back and would not be visible. Where necessary a precautionary approach has been taken towards the presence of species.

The survey involved walking the area in the vicinity of the proposed works including a 250m buffer along the coast. The designated sites have not been visited in full, with much of the information on their qualifying interest taken from published information. This is sufficient to determine relevant likely significant effects for this assessment.

2.7 Consultation

The initial Habitat Regulations Assessment was sent to Natural England for review on 09 March 2026. Their formal response was sent on 25 March 2026. This assessment was duly revised in light of their comments. In particular, the potential for likely significant effects due to pollution and other emissions from site and the spread of INNS was accepted, and an Appropriate Assessment was completed. Natural England requested to be consulted again once the revised assessment was prepared.

3 Description of the project

3.1 Site Location

The site is located on the coastline within the tidal environment approximately 3km south east of Cromer on the North Norfolk Coast. The approximate central Ordnance Survey grid reference (OSGR) is TG2497240970. Figure 3-1 below shows the location of the site in relation to the surrounding area.



Figure 3-1: Site Location Map

3.2 Proposed Works

Works consist of remedial works to the existing steel sheet piled coastal wall and will involve constructing a new steel sheet piled concrete apron to encase the lower portion of the existing seawall. Steel sheet piles will be installed no more than 1m seaward of the existing steel sheet piles and to a depth of no more than 5m below ground level. The gap between the new wall and the existing will be filled with concrete.

The assessment is based on the following key principals:

- Works will take place during July to October 2026.
- Access will take place via the existing hardstanding track at the eastern extent of the site (off Clifton Way) and will use the existing site compound on hard standing at the base of the cliffs in this location.
- Vehicle movements to access the western site (Fisherman's Slope) will be along the existing concrete promenade.
- The number of active machines on site is likely to be small, not more than 5 at any one time.
- The works will require only modest delivery of material (e.g. cement, metal piles) and very limited long-term storage of hazardous liquids. Where used, these substances will be stored in site compounds in a way that spills would be easily contained.
- The works will be outside Overstrand Cliffs SAC all times, although some works will be within the Greater Wash SPA boundary.

The works will follow the following methodology:

- Mobilise to site with temporary welfare unit.
- Establish site compound including offices, welfare and storage.
- Fence off East promenade section.
- String out piles along lower level, ready for installation.
- Mobilise Excavator with Movax Piling Attachment.
- Drive piles. Machine to be positioned on high level promenade.
- Once piling complete use combination of mini digger and Vac-ex unit to remove sand from behind piles.
- Tip sand in compound then redistribute on beach with excavator and dumper
- Place concrete using pump. Form stopends with expamet or similar.
- Prior to completion of piling fence off West promenade section and string out piles.
- Drive piles.
- Once piling complete use combination of mini digger and Vac-ex unit to remove sand from behind piles.
- Tip sand in compound then redistribute on beach with excavator and dumper.
- Remove fencing and clear site.

4 European Sites

4.1 Project Area of Influence and European Sites

The proposed works is located within the Greater Wash SPA and adjacent to but just outside of, the Overstrand Cliffs SAC, see Figure 4-1. At the closest point the works could be within 5m of the boundary, but will not take place inside the SAC.



Figure 4-1: Location of works in relation to European designated sites.

4.2 The Greater Wash SPA

4.2.1 Qualifying Features

The site is designated under the Habitats Directive 92/43/EEC, which is transposed into UK law under the Conservation of Habitats and Species Regulations 2017 as it is used regularly by 1% or more of the Great Britain populations of the following species listed in Annex I in any season (Natural England 2018^b):

- Non-breeding
 - Red-throated Diver *Gavia Stellata*
 - Little Gull *Hydrocloeus minutus*
- Breeding
 - Sandwich Tern *Sterna sandvicensis*
 - Common Tern *Sterna hirundo*
 - Little Tern *Sterna albifrons*

In addition, the site qualifies under Article 4.2 of the Directive 2009/147/EC by regularly supporting a population of migratory species of international importance:

- Common Scoter *Melanitta nigra*

4.2.2 Conservation Objectives

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 Natural England (2015);

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

4.2.3 Known Pressures and Threats to Conservation Status

The standard data form for the SPA (JNCC 2018) identifies five pressures/threats to the conservation status of the SPA. These are:

- Outdoor sports and recreation.
- Shipping lanes.
- Renewable abiotic energy use.
- Marine water pollution.
- Fishing and harvesting of aquatic resources.

4.3 Overstrand Cliffs SAC

4.3.1 Qualifying Features

The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I Natural England (2005):

- Vegetated sea cliffs of the Atlantic and Baltic coasts.

4.3.2 Conservation Objectives

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 (Natural England 2018^a);

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

4.3.3 Known Pressures and Threats to Conservation Status

The standard data form for the SAC (JNCC 2015) identifies one pressures/threats to the conservation status of the SAC. These are:

- Human induced changes in hydraulic conditions.

5 Screening Assessment

5.1 Introduction

The proposed development is not wholly directly connected with, or necessary to, the conservation management of the site's qualifying features. Therefore, a HRA screening assessment is required.

The following section identifies potential hazards of the proposed works. The effects of relevant hazards are then assessed in relation to the qualifying features of the Greater Wash SPA and Overstrand Cliffs SAC. The likelihood of potential exposure to the hazard and the mechanism of effects are also identified where possible. This then allows for likely significant effects on the interest feature of the designated site to be identified.

5.2 Potential Hazards to European Sites

The proposed project, as detailed in Section 3, was assessed in order to identify potential hazards that might arise to the qualifying interest feature of the Overstrand Cliffs SAC and Greater Wash SPA. The potential hazards to the European site are based on the qualifying feature and conservation objectives. These are:

- Competition from, or mortality due to, invasive non-native species (INNS)
- Change in water chemistry
- Noise and visual disturbance (temporary during construction)
- Killing/injury or removal of fish or other animals

Table 5-1: Assessment of potential hazards upon qualifying interest features of Greater Wash SPA

Potential hazards	Breeding birds	Non-breeding birds
Noise and visual disturbance	✓	✓
Change in water chemistry	✓	✓
Killing/injury or removal of fish or other animals	✓	✓
Competition from, or mortality due to, invasive non-native species (INNS)	✓	✓

Table 5-2: Assessment of potential hazards upon qualifying interest features of Overstrand Cliffs SAC

Potential hazards	Annex 1 Habitats
Noise and visual disturbance	x
Change in water chemistry	✓
Killing/injury or removal of fish or other animals	x
Competition from, or mortality due to, invasive non-native species (INNS)	✓

Potential hazards	Annex 1 Habitats
Direct habitat loss or habitat degradation	✓

5.3 Assessment of Likely Significant Effects

An assessment of the hazards identified in tables Table 5-1 and Table 5-2 was undertaken to determine whether they would be likely to have a significant effect on the qualifying features of Greater Wash SPA and Overstrand Cliffs SAC, as a consequence of the project, either alone, or in-combination with other plans or projects. The results of the screening assessment are given in Table 5-3.

Table 5-3: Screening Assessment Greater Wash SPA

Qualifying Feature	Risk (Pressure)	Likely Significant Effect Alone	Yes or No	Likely Significant Effect in Combination	Yes or No
Greater Wash SPA					
Breeding Birds: Sandwich Tern <i>Sterna sanvicensis</i> Common Tern <i>Sterna hirundo</i> Little Tern <i>Sterna albifrons</i>	Noise and visual disturbance	<p>There is potential for the works to result in temporary noise and visual disturbance to breeding birds using the habitats within the North Sea, adjacent to the site.</p> <p>The site is located within an existing area of heavily modified coastline and the proposed works are temporary and small scale. They are situated on a public beach, with the works due to take place in Summer when the beach will be busy and so the site is already subject to both noise and visual disturbance, and there will be a level of habituation to disturbance.</p> <p>The area of the SPA is 622km² with the project area being one of the least important areas for the designated birds on the basis of modified environment and high recreational use, additionally the breeding bird population are unlikely to nest in the area due to recreational pressure.</p> <p>No effect</p>	No	No requirement for assessment of effect in-combination - zero effect alone.	No
	Change in water chemistry	<p>Construction works have the potential to release pollutants (e.g. through spillages/leaks) or mobilise sediment which could adversely affect habitats which are used by breeding bird species.</p> <p>Likely significant effect</p>	Yes	All of the planning applications within 1km of the site are all small-scale works that have no direct	No

Qualifying Feature	Risk (Pressure)	Likely Significant Effect Alone	Yes or No	Likely Significant Effect in Combination	Yes or No
				connection to the site. There are no Nationally Significant Infrastructure Projects within 1km of the site.	
	Killing/injury or removal of fish or other animals	There will be no alone effect as the works will only be undertaken around low tide, when there is no water within the working area therefore the birds will not be in the works area. There is a potential indirect impact from pollution events as discussed above, but this is considered separate from the killing/injuring or removal of fish and other prey items. No effect	No	No requirement for assessment of effect in-combination - zero effect alone.	No
	Competition from, or mortality due to, invasive non-native species (INNS)	There are no INNS that could affect the designated breeding Sandwich, Common and Little Tern. No effect	No	No requirement for assessment of effect in-combination - zero effect alone.	No

Qualifying Feature	Risk (Pressure)	Likely Significant Effect Alone	Yes or No	Likely Significant Effect in Combination	Yes or No
Non-Breeding Birds: Red-throated Diver <i>Gavia stellata</i> Little Gull <i>Hydrocoloeus minutus</i> Common Scoter <i>Melanitta nigra</i>	Noise and visual disturbance	<p>There is potential for the works to result in temporary noise and visual disturbance to non-breeding birds using the habitats within the North Sea, adjacent to the site.</p> <p>The site is located within an existing area of heavily modified coastline and the proposed works are temporary and small scale. They are situated on a public beach, so the site is already subject to both noise and visual disturbance, and there will be a level of habituation to disturbance.</p> <p>Additionally, all the designated birds of the SPA are birds that prefer habitat further out to sea, and so are unlikely to be in the works area (BTO 2026).</p> <p>The area of the SPA is 622km² with the project area being one of the least important areas for the designated birds on the basis of modified environment and high recreational use, additionally the breeding bird population are unlikely to nest in the area due to recreational pressure.</p> <p>No effect</p>	No	No requirement for assessment of effect in-combination - zero effect alone.	No
	Change in water chemistry	<p>Construction works have the potential to release pollutants (e.g. through spillages/leaks) or mobilise sediment which could adversely affect habitats which are used by non-breeding bird species.</p> <p>Likely significant effect</p>	Yes	All of the planning applications within 1km of the site are all small-scale works that have no direct connection to the	No

Qualifying Feature	Risk (Pressure)	Likely Significant Effect Alone	Yes or No	Likely Significant Effect in Combination	Yes or No
				site. There are no Nationally Significant Infrastructure Projects within 1km of the site.	
	Killing/injury or removal of fish or other animals	There will be no alone effect as the works will not be undertaken when the working area is at risk of tidal inundation. There is a potential indirect impact from pollution events as discussed above, but this is considered separate from the killing/injuring or removal of fish and other prey items. No effect	No	No requirement for assessment of effect in-combination - zero effect alone.	No
	Competition from, or mortality due to, invasive non-native species (INNS)	There are no INNS that could affect the designated non-breeding Red-throated Diver, Little Gull and Common Scoter. No effect	No	No requirement for assessment of effect in-combination - zero effect alone.	No

Table 5-4: Screening Assessment Overstrand Cliffs SAC

Qualifying Feature	Risk (Pressure)	Likely Significant Effect Alone	Yes or No	Likely Significant Effect in Combination	Yes or No
Overstrand Cliffs SAC					
Annex 1 Habitat: Vegetated sea cliffs of the Atlantic and Baltic coasts	Competition from, or mortality due to, invasive non-native species (INNS)	The works are 5m from the SAC boundary, therefore, there is a risk of spreading or introducing INNS via small, mobile fragments of vegetation. Likely significant effect	Yes	There is no requirement for an assessment of effect in-combination - zero effect alone.	No
	Change in water chemistry	Construction works have the potential to release pollutants (e.g. through spillages/leaks) or mobilise sediment which could adversely affect the designated habitats. Likely significant effect	Yes	All of the planning applications within 1km of the site are all small-scale works that have no direct connection to the site. There are no Nationally Significant Infrastructure Projects within 1km of the site.	No

Qualifying Feature	Risk (Pressure)	Likely Significant Effect Alone	Yes or No	Likely Significant Effect in Combination	Yes or No
	Direct habitat loss or habitat degradation	<p>The works are close to areas of SAC habitat but will remain outside the boundary at all times there is no need to enter the protected area. The presence of concrete structures and rock armour create a clear natural separation of the works from the SAC.</p> <p>No effect</p>	No	There is no requirement for an assessment of effect in-combination - zero effect alone.	No

5.4 Other Plans and Projects

A search of the North Norfolk District Planning Portal (<https://idoxpa.north-norfolk.gov.uk/online-applications/simpleSearchResults.do?action=firstPage>) [Accessed: 10/12/2025] was undertaken to identify other plans or projects that have the potential to impact on the same qualifying interest features of European sites under consideration. No plans were identified that could potentially act in-combination with the proposed works. All of the planning applications within 1km of the site are all small-scale works that have no direct connection to the site. There are no Nationally Significant Infrastructure Projects within 1km of the site.

5.5 Screening Assessment Summary

At stage 1, certain effects could not be screened out without appropriate management strategies put in place, those effects requiring appropriate assessment are summarised in Table 5-5 below.

Table 5-5: Summary of screening conclusions for the project showing all screened in hazards and European Sites

Qualifying Feature	Hazard	Likely significant effect alone	Likely significant effect in-combination
The Greater Wash SPA			
A191 <i>Sterna sandvicensis</i> Sandwich Tern (Breeding) A193 <i>Sterna hirundo</i> Common Tern (Breeding) A195 <i>Sternula albifrons</i> Little Tern (Breeding) A065 Common Scoter, <i>Melanitta nigra</i> (non-breeding) A177 Little Gull <i>Hydrocoloeus (Larus) minutus nigra</i> (non-breeding) A001 Red-throated Diver <i>Gavia stellata</i> (non-breeding)	Disturbance Mortality Competition from, or mortality due to, Invasive Non-Native Species (INNS)	No Likely Significant Effect	No Likely Significant Effect
A191 <i>Sterna sandvicensis</i> Sandwich Tern (Breeding) A193 <i>Sterna hirundo</i> Common Tern (Breeding) A195 <i>Sternula albifrons</i> Little Tern (Breeding) A065 Common Scoter, <i>Melanitta nigra</i> (non-breeding) A177 Little Gull <i>Hydrocoloeus (Larus) minutus nigra</i> (non-breeding) A001 Red-throated Diver <i>Gavia stellata</i> (non-breeding)	Changes in water quality	Likely Significant Effect	None
Overstrand Cliffs SAC			
Annex 1 Habitat: Vegetated sea cliffs of the	Disturbance	No Likely	No Likely

Qualifying Feature	Hazard	Likely significant effect alone	Likely significant effect in-combination
Atlantic and Baltic coasts	Mortality	Significant Effect	Significant Effect
Annex 1 Habitat: Vegetated sea cliffs of the Atlantic and Baltic coasts	Changes in water quality Competition from, or mortality due to, Invasive Non-Native Species (INNS)	Likely Significant Effect	None

6 Appropriate Assessment

6.1 Introduction

Stage 2 of the HRA process is an Appropriate Assessment, which is required because likely significant effects caused by the proposed works have been identified on The Greater Wash SPA and Overstrand Cliffs SAC.

6.2 European Sites

Table 6-1 below shows the European sites that have been screened into the Appropriate Assessment, as summarised in Table 5-5.

Table 6-1: European sites screened into this assessment

Site Name	Proximity to Site	Qualifying Interests Screened In
The Greater Wash SPA	Overlaps footprint of works	<ul style="list-style-type: none"> • A191 <i>Sterna sandvicensis</i> Sandwich Tern (Breeding) • A193 <i>Sterna hirundo</i> Common Tern (Breeding) • A195 <i>Sternula albifrons</i> Little Tern (Breeding) • A065 Common Scoter, <i>Melanitta nigra</i> (non-breeding) • A177 Little Gull <i>Hydrocoloeus (Larus) minutus nigra</i> (non-breeding) • A001 Red-throated Diver <i>Gavia stellata</i> (non-breeding)
Overstrand Cliffs SAC	5m away from the site boundary	Annex 1 Habitat: Vegetated sea cliffs of the Atlantic and Baltic coasts

6.3 The Greater Wash SPA: Breeding Sandwich, Common and Little Tern

6.3.1 Pathways to adverse effects on site integrity

Potential chemical or work material spills, or mobilisation and deposition of high volumes of dust or silt could have an indirect significant effect on the breeding Sandwich, Common and Little Tern and non-breeding Common scoter, Little Gull and Red-throated Diver as any spill has the potential to spread into the sea. If this were to happen then there could be a reduction in the amount of key food for the birds (fish) in the immediate area, reducing the amount of available food for the breeding Sandwich, Common and Little Tern, and non-breeding Common scoter, Little Gull and Red-throated Diver, as well as a direct impact on birds coming into contact with polluted water. This has the potential to result in issues relating to the following conservation objectives:

- Maintain or restore extent and distribution of the habitats of the qualifying features
- Maintain or restore structure and function of the habitats of the qualifying features
- Maintain or restore distribution of the qualifying features within the site

These Conservation Objectives would all be undermined, in the absence of mitigation, if pollution events result in loss of habitat condition, causing changes in structure and function and causing the bird species to change distribution to use other areas of habitat.

6.3.2 Proposed Mitigation

To minimise adverse impacts to breeding birds of the SPA, the following mitigation will be implemented:

- In-situ (wet) concrete will be transported by wagon and then installed behind sheet piling using either concrete chute or pump directly from the wagon.
- Pours will be carefully monitored for any signs of leakage.
- There will be no storage of chemicals or powders on site unless it is kept inside a storage container or portacabin.
- All plant will be checked daily for fuel leaks.
- All plant will have drip trays.
- The generator in the compound will be checked daily for fuel leaks.
- The generator in the compound will have a drip tray.

6.3.3 Assessment in light of avoidance and mitigation measures

These measures to control pollution and other emissions from site can be implemented with a high degree of confidence and are known methods that will reduce to negligible levels the potential for any potential pollution of the water. With these measures in place there will be no adverse effects on the integrity of the Great Wash SPA nor any of its qualifying interest features.

6.4 Overstrand Cliffs SAC: Annex 1 Habitat Vegetated sea cliffs of the Atlantic and Baltic coasts

6.4.1 Pathways to adverse effects on site integrity

Pollution forms a medium threat and pressure to Vegetated Sea cliffs of the Atlantic and Baltic coasts (JNCC 2019). There is the potential for chemicals from the plant machines and works materials to be spilled during the site operation. This could spill into the adjacent SAC 5m away from the site.

There is also the potential for the spread of INNS into the adjacent SAC via small, mobile fragments of vegetation. If these fragments establish these species could outcompete the species associated with the vegetated sea cliffs. Additionally, under the Wildlife and Countryside Act 1981 (as amended) it is an offence to allow any Schedule 9 plant to spread to the wild.

In terms of Conservation Objectives, both of these impacts, in the absence of mitigation, would result in an adverse effect through preventing the maintenance of the structure and function of the vegetation that forms the Vegetated Sea Cliff.

6.4.2 Proposed Mitigation

To minimise adverse impacts to Vegetated Sea cliffs of the Atlantic and Baltic coasts, the following mitigation will be implemented:

- In-situ (wet) concrete transported by wagon and then installed behind sheet piling using either concrete chute or pump directly from the wagon.
- Pours will be carefully monitored for any signs of leakage.
- There will be no storage of chemicals or powders on site unless it is kept inside a storage container or portacabin.
- All plant will be checked daily for fuel leaks.
- All plant will have drip trays.
- The generator in the compound will be checked daily for fuel leaks.
- The generator will have a drip tray.
- A daily check will be made of any tracks and working areas where INNS are present on the cliffs above to look for loose or fallen debris that could contain fragments. If debris has fallen, this should be cleaned from tracks and working areas and disposed of appropriately prior to the start of works.
- All works equipment will be checked for INNS, cleaned and dried daily.
- All works personnel will check their clothing for INNS, and clothing will be cleaned and dried on entering and exiting site.

6.4.3 Assessment in light of avoidance and mitigation measures

These measures to control pollution and other emissions from site can be implemented with a high degree of confidence and are known methods that will reduce to negligible levels the potential for any potential pollution of the water or the SAC habitat. The measures to control INNS are also simple measures that can be implemented with a high degree of confidence. With these measures in place there will be no adverse effects on the integrity of the Overstrand Cliffs SAC nor any of its qualifying interest features.

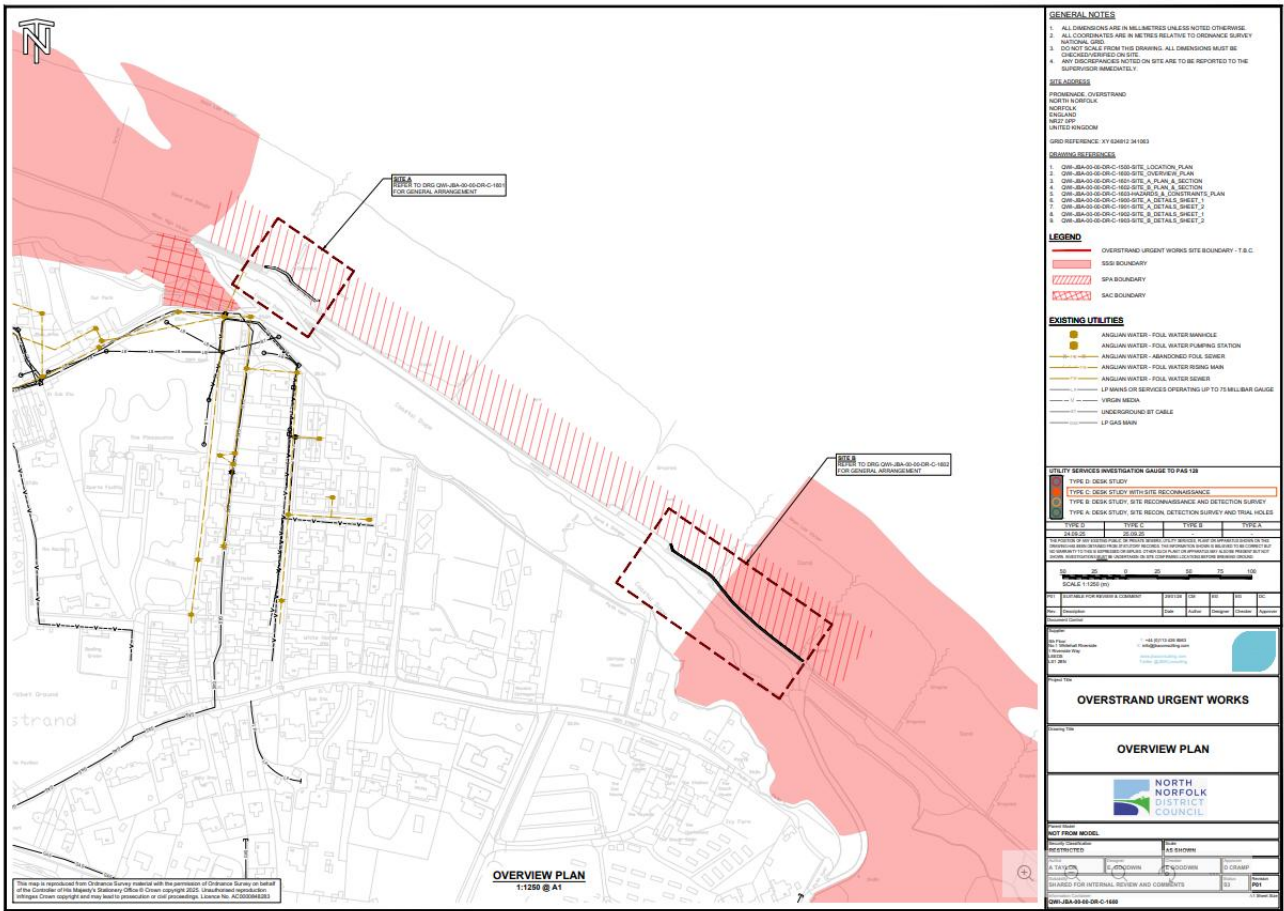
6.5 In-combination Effects

A search of the North Norfolk District Planning Portal (<https://idoxpa.north-norfolk.gov.uk/online-applications/simpleSearchResults.do?action=firstPage>) [Accessed: 10/12/2025] was undertaken to identify other plans or projects that have the potential to impact on the same qualifying interest features of European sites under consideration. No plans were identified that could potentially act in-combination with the proposed works. All of the planning applications within 1km of the site are all small-scale works that have no direct connection to the site. There are no Nationally Significant Infrastructure Projects within 1km of the site.

6.6 Appropriate Assessment Conclusion

Taking into account the prevailing site conditions, screened in qualifying features, and the typical habitats and species necessary to support these features, the proposed works and mitigation measures and the conservation objectives for each European site, no adverse impacts on site integrity were identified. The proposed mitigation measures are considered sufficient such that adverse impacts on site integrity, in view of the site's conservation objectives, will not occur. Given the mitigation measures proposed are industry standard methods for minimising impacts and ensuring receptors are not present within works footprints at the time of works, there is a high degree of confidence that the mitigation measures proposed will be successful.

A Current Concept Site Plan



References

BTO (2026) BirdFacts Species: profiles of birds occurring in the United Kingdom. BTO, Thetford (www.bto.org/birdfacts, accessed on 18/05/2026).

DTA, 2019. *The Habitat Regulations Assessment Handbook*. DTA Publications.

JNCC (2018) *Standard data form - Greater Wash* Available at: <https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9020329.pdf> [Accessed: 10th December 2025]

JNCC (2015) *Standard data form - Overstrand Cliffs* Available at: <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0030232.pdf> [Accessed: 10th December 2025]

JNCC (2019) Habitat 1230: Vegetated sea cliffs of the Atlantic and Baltic coasts. UK Habitats Directive Article 17 Report 2019. Available at: <https://hub.jncc.gov.uk/jncc-assets/Art17/H1230-UK-Habitats-Directive-Art17-2019.pdf> (Accessed: 14 April 2026).

Lafferty, K.D. Birds at a Southern California beach: seasonality, habitat use and disturbance by human activity. *Biodiversity and Conservation* 10, 1949–1962 (2001).
<https://doi.org/10.1023/A:1013195504810>

Natural England (2018^a) *European Site conservation objectives for Overstrand Cliffs SAC* Available at: <https://publications.naturalengland.org.uk/publication/5901598018502656> [Accessed: 10th December 2025]

Natural England (2005) *Citation for Overstrand Cliffs SAC* Available at: <https://publications.naturalengland.org.uk/publication/5901598018502656> [Accessed: 10th December 2025]

Natural England (2018^b) *Citation for Greater Wash SPA* Available at: <https://publications.naturalengland.org.uk/publication/4597871528116224> [Accessed: 10th December 2025]

Natural England (2015) *European Site conservation objectives for Greater Wash SPA* Available at: <https://publications.naturalengland.org.uk/publication/4597871528116224> [Accessed: 10th December 2025].



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