

Date: 23 September 2021
Our ref: 361910
Your ref: Ipswich Local Plan Review Main Modifications Consultation



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BY EMAIL ONLY

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Dear Martyn Fulcher,

Ipswich Local Plan:

- (1) Core Strategy and Policies Development Plan Document Main Modifications**
- (2) Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Main Modifications**
- (3) Sustainability Appraisal of Main Modifications**
- (4) Habitats Regulations Assessment of Main Modifications Core Strategy and Development Plan Document Review**
- (5) Habitats Regulations Assessment of Main Modifications Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review**

Thank you for your consultation on the above dated 28 July 2021 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

(1) Core Strategy and Policies Development Plan Document Main Modifications

Natural England has no comment to make in regard to the Core Strategy and Policies Development Plan Document Main Modifications.

(2) Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Main Modifications

Recreational Disturbance – European designated sites

We note that a large number of the new policies relating to residential allocations include the following statement, "mitigation will be required to address impacts to the Stour and Orwell Estuaries SPA/Ramsar from recreation, and this can be achieved through contribution to the RAMS."

The Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy ('RAMS') has been put in place to ensure that the additional recreational pressure due to increasing levels of housing across the county is not likely to lead to an adverse effect on European designated sites on the Suffolk coast. The strategy allows mitigation to be dealt with on a strategic level, so that the relevant councils, Natural England and relevant stakeholders are able to work together to provide the best outcomes for the designated sites. It also has the benefit of streamlining the process, so reducing the amount of time taken to process individual residential planning applications for the councils and

Natural England worked collaboratively with all the relevant councils, including Ipswich Borough Council, to set up the strategy. We fully support the aims of the strategy; in our view it is the best way to provide appropriate avoidance and mitigation measures for the European sites in question. However, we also advise that a contribution to the RAMS strategy alone for residential developments within the 13km zone of influence is not always sufficient to determine that there will not be an adverse effect on the integrity of the relevant European designated sites, primarily in this instance the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar. It is considered that larger residential developments (50 units +, or equivalent, as a guide) within the 13 km Suffolk Coast RAMS zone of influence, or some smaller residential developments that are in very close proximity (200m or less) to designated sites, are not able to fully mitigate the adverse impacts on European designated sites with a RAMS payment alone. Natural England therefore recommends that these developments include the provision of well-designed open space/green infrastructure (GI) that is proportionate to its scale to minimise any predicted increase in recreational pressure to designated sites, by containing the majority of recreation within and around the development site boundary. As a minimum, we advise that such provisions should include:

- High-quality, informal, semi-natural areas
- Circular dog walking routes of 2.7 km¹ within the site and/or with links to surrounding
- public rights of way (PRoW)
- Dedicated 'dogs-off-lead' areas
- Signage/information leaflets to householders to promote these areas for recreation
- Dog waste bins
- A commitment to the long term maintenance and management of these provisions

As such we consider that policies for larger residential developments (50 units +, or equivalent, as a guide) and any smaller residential developments that are in very close proximity (200m or less) to designated sites, should be amended to reflect that further mitigation will be required beyond a contribution to the Suffolk Coast RAMS to ensure no adverse effect on the integrity of any European site as a result of recreational disturbance. These comments are consistent with our previous advice provided at earlier stages of the Ipswich Local Plan.

There is also some inconsistency throughout new policies relating to residential allocations in regard to the Suffolk Coast RAMS and recreational disturbance. Some policies which allocate sites over 50 dwellings refer directly the requirement for a project level HRA "to check the site design" whilst others do not. Likewise, there is some inconsistency in whether policies for allocated sites below 50 dwellings directly reference a requirement for a proportionate contribution to the Suffolk Coast RAMS. For example there is no mention within 'New Policy Former School Site, Lavenham Road (IP061)'. We advise that the new policies relating to residential allocations are checked to ensure consistency on this matter.

MM199 & MM200 - New Policy Sites off Nacton Road, South Ravenswood

Allocation IP150b is directly adjacent to the Brazier's Wood, Pond Alder Carr and Meadows County Wildlife Site (CWS) which could be affected by urbanisation and recreational disturbance as a result of the new Ravenswood policy sites. The CWS supports many breeding skylark territories. Breeding skylarks are susceptible to recreational disturbance, primarily from dogs-off-leads. You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 174, 175, 179 and 180 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

¹ Taken from *Jenkinson, S., (2013), Planning for dog ownership in new developments: reducing conflict – adding value. Access and greenspace design guidance for planners and developers*

Biodiversity Net Gain

We welcome and commend the various new policy statements which seek to ensure biodiversity net gain is delivered on new development sites, as well as other biodiversity enhancement and protection measures incorporated.

(3) Sustainability Appraisal of Main Modifications

We are satisfied that the methodology and baseline information used to inform the report appears to meet the requirements of the SEA Directive [2001/42/EC] and associated guidance. Furthermore the SA of the main modifications contains a robust assessment of the environmental effects of plan policies and allocations on statutorily (and non-statutorily) designated sites and landscapes including the Orwell Estuary SPA, SSSIs and the Suffolk Coast and Heaths AONB and has taken into account both our advice and the findings of the HRA.

We also wish to state that we support the recommendation for a coherent GI network, which would improve have multiple beneficial effects including improving access to nature, mitigation for recreational impacts on designates sites and improvements to local biodiversity.

(4) Habitats Regulations Assessment of Main Modifications Core Strategy and Development Plan Document Review

Natural England notes that your authority, as competent authority, has undertaken an appropriate assessment of the proposal in accordance with regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process.

Your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in any related planning permissions given.

(5) Habitats Regulations Assessment of Main Modifications Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review

Unfortunately we were unable to access/download the 'Habitats Regulations Assessment of Main Modifications Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review' from the Council's website. If the council could provide send the document directly at the earliest possible occasion we would be happy to provide a prompt response.

If you have any queries relating to the advice in this letter please contact me on 07768 237040

Yours faithfully

Sam Kench
Lead Adviser, Norfolk and Suffolk Team