

Date: 24 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:
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.

In our previous consultation response (dated 23rd September 2021) we noted that we were unable to access 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. The council has since sent us the HRA directly and on this document we offer the following advice:

Natural England notes that your authority, as competent authority, has undertaken an appropriate assessment of the plan 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, and a competent authority should have regard to Natural England's advice.

Your appropriate assessment concludes that your authority is able to ascertain that the plan 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 any adverse effects, it is the advice of Natural England that **it is not possible** to ascertain that the plan will not result in adverse effects on the integrity of the sites in question.

Natural England advises that the assessment does not currently provide enough information and/or certainty to justify the assessment conclusion and that your authority should not adopt the plan at this stage.

Further assessment and consideration of mitigation options is required, and Natural England provides the following advice on the additional assessment work required;

As stated within our previous consultation response (23rd September 2021, our ref: 361910) 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.

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 as to whether policies for allocated sites below 50 dwellings directly refer to 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 should be checked to ensure consistency on this matter.

Should the above advice be applied to the Main Modifications Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review and be considered

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*

within the Habitats Regulations Assessment, we advise that the plan will not result in an adverse effect on the integrity of any European designated site.

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