

Date: 05 October 2021
Our ref: 369844
Your ref: Ipswich Local Plan Review Main Modifications Consultation



PlanningPolicy@ipswich.gov.uk
BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

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 continued consultation on the above.

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 on the above (dated 24th September 2021, our ref: 361910), we advised that:

- *'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.'*
- *'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.'*
- *'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 [Recreational Disturbance Avoidance and Mitigation Strategy] RAMS to ensure no adverse effect on the integrity of any European site as a result of recreational disturbance.'*

The further Plan policy measures which we advised were necessary related to securing the provision of well-designed open space/green infrastructure (GI) within developments, proportionate to their scale. This is in order to minimise any predicted increase in recreational pressure to European designated sites, by containing the majority of recreation within and around a development site boundary. Our concerns related to some of the wording within the Site Allocations and Policies Document, which appeared to indicate that certain residential site allocation policies >50 units (dwellings) would be considered fully mitigated in regard to recreational disturbance on European sites through a financial contribution to the RAMS strategy alone.

Following our consultation response, we attended a meeting with Ipswich Borough Council on the 5th October 2021 to discuss our concerns. The council provided further information and clarification on how this advice had already been captured by their core strategy policy DM8 and their active

Suffolk Coast RAMS Supplementary Planning Document (SPD). The council highlighted that the residential planning policies within the '*Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document*' outline site constraints only and compliance with the core strategy policy DM8 and RAMS SPD are sufficient to provides the necessary safeguards with respect to this issue.

On this basis, we agree with the councils reasoning and are now satisfied that the Plan will not result in adverse effects on the integrity of any of the European sites in question, providing that all mitigation measures are appropriately secured in any related planning permissions, consistent with the Plan policy. As such this advice supersedes our previous consultation letter (dated 24th September 2021, our ref: 361910).

Therefore, in the context of our remit, Natural England considers the approach taken with regards to the natural environment within the Ipswich Local Plan to be sound.

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