



**East Suffolk House, Riduna Park, Station  
Road, Melton, Woodbridge, IP12 1RT**

# Cabinet

## **Members:**

Councillor Steve Gallant (Leader)

Councillor Craig Rivett (Deputy Leader and  
Economic Development)

Councillor Norman Brooks (Transport)

Councillor Stephen Burroughes (Customer  
Services, ICT and Commercial Partnerships)

Councillor Maurice Cook (Resources)

Councillor Richard Kerry (Housing)

Councillor James Mallinder (The Environment)

Councillor David Ritchie (Planning & Coastal  
Management)

Councillor Mary Rudd (Community Health)

Councillor Letitia Smith (Communities, Leisure  
and Tourism)

Members are invited to a **Meeting of the Cabinet**  
to be held on **Tuesday, 4 May 2021 at 6:30pm**

This meeting will be conducted remotely, pursuant to the Local Authorities and  
Police and Crime Panels (Coronavirus) (Flexibility of Local Authority and Police  
and Crime Panel Meetings) (England and Wales) Regulations 2020.

The meeting will be facilitated using the Zoom video conferencing system and  
broadcast via the East Suffolk Council YouTube channel at

<https://youtu.be/xDADTqrby5c>

An Agenda is set out below.

## Part One – Open to the Public

### Pages

#### 1 **Apologies for Absence**

To receive apologies for absence, if any.

#### 2 **Declarations of Interest**

Members and Officers are invited to make any declarations of Disclosable Pecuniary or Local Non-Pecuniary Interests that they may have in relation to items on the Agenda and are also reminded to make any declarations at any stage during the Meeting if it becomes apparent that this may be required when a particular item or issue is considered.

#### 3 **Announcements**

To receive any announcements.

#### 4 **Minutes**

To confirm as a correct record the Minutes of the Meeting held on 6 April 2021

**1 - 5**

### **KEY DECISIONS**

#### 5 **Enabling Communities Strategy ES/0748**

Report of the Cabinet Member with responsibility for Communities, Leisure and Tourism

**6 - 19**

#### 6 **Adoption of Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document ES/0749**

Report of the Cabinet Member with responsibility for Planning and Coastal Management

**20 - 139**

#### 7 **Exempt/Confidential Items**

It is recommended that under Section 100A(4) of the Local Government Act 1972 (as amended) the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Paragraphs 3 and 4 of Part 1 of Schedule 12A of the Act.

## Part Two – Exempt/Confidential

### Pages

#### 8 **Exempt Minutes**

- Information relating to any individual.
- Information that is likely to reveal the identity of an individual.
- Information relating to the financial or business affairs of any particular person (including the authority holding that information).

### **KEY DECISIONS**

## 9 Proposed Redevelopment off Newcombe Road and Trinity Road, Lowestoft

- Information relating to the financial or business affairs of any particular person (including the authority holding that information).

## 10 Review of Outsourcing Arrangements

- Information relating to the financial or business affairs of any particular person (including the authority holding that information).
- Information relating to any consultations or negotiations, or contemplated consultations or negotiations, in connection with any labour relations matter arising between the authority or a Minister of the Crown and employees of, or office holders under, the authority.

Close



Stephen Baker, Chief Executive

### Filming, Videoing, Photography and Audio Recording at Council Meetings

The Council, members of the public and press may record / film / photograph or broadcast this meeting when the public and press are not lawfully excluded. Any member of the public who attends a meeting and objects to being filmed should advise the Committee Clerk (in advance), who will instruct that they are not included in any filming.

If you require this document in large print, audio or Braille or in a different language, please contact the Democratic Services Team on 01502 523521 or email:

[democraticservices@eastsoffolk.gov.uk](mailto:democraticservices@eastsoffolk.gov.uk)



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[www.local.gov.uk/Community-Leadership](http://www.local.gov.uk/Community-Leadership)

**Unconfirmed**



Minutes of a Meeting of the **Cabinet** held via Zoom, on **Tuesday, 06 April 2021** at **6:30 PM**

**Members of the Cabinet present:**

Councillor Norman Brooks, Councillor Stephen Burroughes, Councillor Maurice Cook, Councillor Steve Gallant, Councillor Richard Kerry, Councillor James Mallinder, Councillor David Ritchie, Councillor Craig Rivett, Councillor Mary Rudd, Councillor Letitia Smith

**Other Members present:**

Councillor Peter Byatt, Councillor Alison Cackett, Councillor Judy Cloke, Councillor Tony Cooper, Councillor Linda Coulam, Councillor Mike Deacon, Councillor John Fisher, Councillor Tracey Green, Councillor TJ Haworth-Culf, Councillor Mark Jepson, Councillor Caroline Topping, Councillor Steve Wiles

**Officers present:** Stephen Baker (Chief Executive), Liz Beighton (Planning Manager), Kerry Blair (Head of Operations), Emma Bloom (Head of Customer Services, Communications and Marketing), Karen Cook (Democratic Services Manager), Andrew Jarvis (Strategic Director), Nick Khan (Strategic Director), Matt Makin (Democratic Services Officer), Sue Meeken (Political Group Support Officer (Labour)), Brian Mew (Chief Finance Officer & Section 151 Officer), Laura Mundy (Principal Planner (Policy and Delivery)), Agnes Ogundiran (Conservative Political Group Support Officer), Desi Reed (Planning Policy and Delivery Manager), Karen Staples (Regeneration and Growth Manager), Paul Wood (Head of Economic Development and Regeneration), Ben Wright (Planner (Policy and Delivery))

**1 Apologies for Absence**

There were no apologies for absence.

**2 Declarations of Interest**

There were no declarations of interest.

**3 Announcements**

The Leader referred to the next stage in the gradual easing of Covid restrictions due to take place on 12 April 2021, stating that the Prime Minister had confirmed on 5 April that England remained on track based on current data, and that the numbers of infections and hospitalisations were dropping considerably. This, the Leader stated, was thanks in no small part to the vaccination programme which continued to be a

success, not only nationally, but also locally, with Suffolk now one of the leading counties for roll out and take up. The Leader outlined the changes that would come into effect on 12 April and commented that this was particularly good news for East Suffolk given the investment East Suffolk Council (ESC) had made in its leisure facilities across the district, and the Leader stated he was pleased that a huge amount of effort had gone into re-opening them safely. The Economic Development and Environmental Health teams had also been working very closely with local businesses to ensure they would be ready to re-open safely.

The Leader stated that testing also remained a critical element of the national response and changes had been made to the way Suffolk continued to offer community testing. The County had conducted over 57,000 tests at 28 sites, however, the numbers of people using test centres (in Suffolk and across the country) had been lower than expected and the focus would now be given to targeted, vulnerable groups and promoting home testing. With this in mind, the East Suffolk sites at Aldeburgh, Southwold, Woodbridge and Bungay had now closed and those at Halesworth, Saxmundham and Debenham would close on 16 April. Sites would remain open at Lowestoft South, Lowestoft North, Felixstowe, Martlesham, Beccles and Framlingham. From 9 April, everyone in England was to be given access to two rapid coronavirus tests a week. The lateral flow kits, which could provide results in around 30 minutes, would be available for free at testing sites, pharmacies and through the post.

The Leader stated the importance of everyone remaining cautious as restrictions were eased and he referred to there still being very clear rules to follow about gatherings and of course the need to adhere to social distancing at all times, and continuing to wear a face mask and wash hands as often as possible. The data was certainly encouraging the Leader stated, however, it would not take much for the picture to worsen.

Turning to another subject, the Leader referred to the reports being considered by Cabinet having been produced on a new report template; this reformatting focussed more overtly on ESC's Strategic Plan and ambitions and the Leader hoped that members and the public would find this format clearer, more informative and easier to read. The Leader added that he would be happy to receive any feedback on the new report template and he thanked the Democratic Services Team for the work that had gone into the roll out of this new initiative.

The Cabinet Member with responsibility for Customer Services, ICT and Commercial Partnerships reported that he was delighted to announce the appointment of Sandra Lewis as the Council's new Head of Digital and Programme Management. Councillor Burroughes, joined by Cabinet, wished Sandra all the very best in her new role.

#### **4 Minutes**

#### **RESOLVED**

That the Minutes of the Meeting held on 2 March 2021 be agreed as a correct record and signed by the Chairman.

#### **5 Adoption of Statement of Community Involvement**

Cabinet received report **ES/0720** by the Cabinet Member with responsibility for Planning and Coastal Management, who reported that the purpose of the report was to adopt a new Statement of Community Involvement which was required by Section 18 of the Planning and Compulsory Purchase Act of 2004, as amended. The Statement of Community Involvement was a document that set out the measures and actions ESC would take to consult and engage with the community during the preparation of planning policy documents and when determining planning applications.

The Leader acknowledged the amount of work that had gone into the production of the Statement; he gave thanks for this and referred to it being easy to read and understand. The Leader referred to how ESC valued the involvement of the public in the Planning process.

The Cabinet Member with responsibility for the Environment stated that he too welcomed the Statement; he particularly referred to Neighbourhood Plans and how they were an example of how residents could influence development and preservation of their towns and villages.

The Cabinet Member with responsibility for Housing stated that he welcomed the Statement; he referred to the time taken by officers to analyse and respond to all comments in respect of planning applications forwarded by members of the public.

Councillor Haworth-Culf gave thanks for the Statement and gave thanks to all who had participated in the consultation exercise. Councillor Haworth-Culf referred to emails and letters received by many councillors recently in respect of Scottish Power Renewables; she referred to a particular email and asked the Leader if he would be acknowledging receipt of correspondence received. In response, the Leader confirmed that he dealt with all correspondence that he received as expeditiously as possible.

Councillor Byatt gave thanks for what he said was an excellent document; Councillor Byatt referred to the consultees and asked why the New Anglia Local Enterprise Partnership was not included within the statutory list, but had been asked to co-operate only. Officers, in response, commented that the list of statutory consultees was set out within Government legislation.

Councillor Byatt referred to the number of respondents during the consultation period; he referenced the importance of on-line options, but also asked for the fullest possible use of village notice boards and takeaways etc. The Leader, in response, encouraged all ward members to make sure that they were engaging with the parish councils within their wards in respect of all consultation exercises and encouraging them to respond. Officers confirmed that, as well as digital methods, the more traditional methods would continue.

Councillor Byatt, in referring to the new report template and in particular the selection of the priorities of the Strategic Plan which were supported by the proposals within reports, suggested that perhaps, social values might be added going forward.

In response to a question by Councillor Topping regarding what was considered to be the correct length of any consultation exercise, officers advised that almost all of the consultation exercises for documents was prescribed by legislation, as a minimum of

four weeks. Officers confirmed that ESC would almost certainly extend that period to at least six weeks. Councillor Topping referred to how she used social media to publicise consultation exercises; she found this very effective.

Councillor Topping referred to what she thought was a discrepancy within the report in respect of the length of the consultation exercise for the Statement of Community Involvement. It was confirmed that there was an error within the report and the consultation had been open for seven weeks.

On the proposition of Councillor Ritchie, seconded by Councillor Mallinder, it was by unanimous vote

## **RESOLVED**

1. That the Statement of Community Involvement at Appendix A of the report be adopted.
2. That the Head of Planning and Coastal Management, in consultation with the Cabinet Member with responsibility for Planning and Coastal Management, be authorised to make any presentational or typographical amendments to the Statement of Community Involvement prior to it being published.

## **6 Exempt/Confidential Items**

The Leader stated that in exceptional circumstances the Council may, by law, exclude members of the public from all, or part of, an executive decision-making meeting. The Council should, unless there were urgent circumstances, give notice of its intention to do so via the Forward Plan, which was updated and published on its website 28 clear days prior to the meeting. There were various reasons, the Leader added, that the Council, on occasions, had to do this and examples were because a report contained information relating to an individual, information relating to the financial or business affairs of a particular person, or information relating to any consultations or negotiations.

Tonight, the Leader reported, the Cabinet would be considering two substantive exempt matters which were outlined in agenda items 8 and 9 on the published agenda. These were Lowestoft Post Office, Cultural Regeneration Project, which asked Cabinet to consider an alternative cultural regeneration project proposal and decide if it would like to pursue the further development of the project, and if so to give delegated authority to the Strategic Director and Head of Operations to agree Heads of Terms with the potential new operators. Secondly, Garden Waste Service, South of the District, asked Cabinet to approve the procurement of a new garden waste service in the south of the District.

On the proposition of Councillor Gallant, seconded by Councillor Rivett, it was by unanimous vote

## **RESOLVED**

That, under Section 100A(4) of the Local Government Act 1972 (as amended) the public

be excluded from the meeting for the following items of business on the grounds that they involved the likely disclosure of exempt information as defined in Paragraphs 1, 2 and 3 of Part 1 of Schedule 12A of the Act.

**7 Exempt Minutes**

- Information relating to the financial or business affairs of any particular person (including the authority holding that information).

**8 Lowestoft Post Office - Cultural Regeneration Project**

- Information relating to any individual.
- Information that is likely to reveal the identity of an individual.
- Information relating to the financial or business affairs of any particular person (including the authority holding that information).

**9 Garden Waste Service - South of the District**

- Information relating to the financial or business affairs of any particular person (including the authority holding that information).

The meeting concluded at TBC

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Chairman





## CABINET

Tuesday, 04 May 2021

<b>Subject</b>	Enabling Communities Strategy
<b>Report by</b>	Councillor Letitia Smith Cabinet Members with responsibility for Communities, Leisure and Tourism
<b>Supporting Officer</b>	Nicole Rickard Head of Communities <a href="mailto:Nicole.rickard@eastsuffolk.gov.uk">Nicole.rickard@eastsuffolk.gov.uk</a> 07766 998074

Is the report Open or Exempt?	OPEN
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Category of Exempt Information and reason why it is <b>NOT</b> in the public interest to disclose the exempt information.	Not applicable
<b>Wards Affected:</b>	All Wards

## Purpose and high-level overview

**Purpose of Report:**

To seek Cabinet approval for the revised Enabling Communities Strategy 2021 – 2024.

**Options:**

The Strategy has been revised to reflect the updated We Are East Suffolk Strategic Plan.

**Recommendation:**

That the revised Enabling Communities Strategy 2021-2024 be approved.

## Corporate Impact Assessment

**Governance:**

Oversight of the Strategy is picked up through the Communities Strategic Plan Delivery Group and the Strategic Plan Delivery Board.

**ESC policies and strategies that directly apply to the proposal:**

‘We are East Suffolk’ Strategic Plan.

**Environmental:**

The Strategy references enabling communities to deliver projects that ‘improve the environment, the economy and the social life of the area – making services and life better for everyone’. It also focusses on building on existing assets, including the environment.

**Equalities and Diversity:**

The Strategy references communities of interest as well as communities of geography in terms of the communities that the Council wants to enable, supporting individuals and families who may need more help and the importance of hearing different voices.

The Equality Impact Assessment on the Strategy is very generic and it is important that EqlAs are undertaken in relation to specific projects and activities identified within the Strategy. However, it specifically references the work of the two Disability Forums, Youth Voice and work around Period Poverty, all of which target specific Protected Characteristic Groups (Disability, Age and Socio-Economic Disadvantage respectively).

**Financial:**

There are no additional financial implications in relation to the Enabling Communities Strategy, although the Enabling Actions sections of the report include details about a range of activity that is already supported through substantial funding through both core budgets and New Homes Bonus, for example Community Partnerships and various grant schemes including the Councillors Enabling Communities Budgets.

**Human Resources:**

There are no Human Resources implications in relation to the strategy. The resource to deliver the various initiatives outlined within the Strategy sits in various teams in the Council, including the Communities Team.

**ICT:**

There are no ICT implications in relation to this Strategy, although there are examples of digital projects within it, specifically our work around Grandpads – simplified tablets aimed at older people.

**Legal:**

None

**Risk:**

Risk assessments are undertaken in relation to individual projects as relevant.

**External Consultees:**

Community Action Suffolk were consulted in the development of the Strategy as some of the projects referenced are delivered by them on behalf of or in conjunction with East Suffolk Council

## Strategic Plan Priorities

Select the priorities of the <a href="#">Strategic Plan</a> which are supported by this proposal: (Select only one primary and as many secondary as appropriate)		Primary priority	Secondary priorities
<b>T01</b>	<b>Growing our Economy</b>		
P01	Build the right environment for East Suffolk	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P02	Attract and stimulate inward investment	<input type="checkbox"/>	<input type="checkbox"/>
P03	Maximise and grow the unique selling points of East Suffolk	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P04	Business partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P05	Support and deliver infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
<b>T02</b>	<b>Enabling our Communities</b>		
P06	Community Partnerships	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P07	Taking positive action on what matters most	<input checked="" type="checkbox"/>	<input type="checkbox"/>
P08	Maximising health, well-being and safety in our District	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P09	Community Pride	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>T03</b>	<b>Maintaining Financial Sustainability</b>		
P10	Organisational design and streamlining services	<input type="checkbox"/>	<input type="checkbox"/>
P11	Making best use of and investing in our assets	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P12	Being commercially astute	<input type="checkbox"/>	<input type="checkbox"/>
P13	Optimising our financial investments and grant opportunities	<input type="checkbox"/>	<input type="checkbox"/>
P14	Review service delivery with partners	<input type="checkbox"/>	<input type="checkbox"/>
<b>T04</b>	<b>Delivering Digital Transformation</b>		
P15	Digital by default	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P16	Lean and efficient streamlined services	<input type="checkbox"/>	<input type="checkbox"/>
P17	Effective use of data	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P18	Skills and training	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P19	District-wide digital infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
<b>T05</b>	<b>Caring for our Environment</b>		
P20	Lead by example	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P21	Minimise waste, reuse materials, increase recycling	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P22	Renewable energy	<input type="checkbox"/>	<input type="checkbox"/>

P23	Protection, education and influence	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XXX	<b>Governance</b>		
XXX	How ESC governs itself as an authority	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>How does this proposal support the priorities selected?</b></p> <p>This Strategy underpins the second theme of our Strategic Plan – ‘Enabling our Communities’. It sets out the Council’s ambition to enable communities to do things for themselves by providing the support, information, funding and tools to help them to achieve their ambitions.</p> <p>However, East Suffolk communities have a key role to play in delivering all five themes of the Strategic Plan. They lead and working in partnership with us on a wide range of projects including digital projects to help people to stay safe in their homes or to get online, environmental activity for example planting or recycling projects, activity to improve health and wellbeing such as dementia café’s, lunch clubs or local walks, supporting local businesses, providing services or facilities for young people or improving community safety through projects such as Town Pastors.</p>			

## Background and Justification for Recommendation

1 Background facts	
1.1	The Enabling Communities Strategy was originally agreed by Cabinet in November 2015.
1.2	Since then the new ‘We Are East Suffolk’ Strategic Plan has been developed and agreed. One of the five priorities in the Plan is ‘Enabling Our Communities’. In light of this and, taking into account the impact of Covid-19 on our communities it was felt timely to review and update the Enabling Communities Strategy.
1.3	The purpose of the Strategy is to clearly set out our ambitions around ‘enabling’ communities in plain English so that our communities and partners understand what they can expect from us i.e. what we mean by ‘enabling communities’ and how we will deliver this.
2 Current position	
2.1	The Enabling Communities Strategy seeks to define concepts like ‘Enabling Communities’, ‘Asset-based approaches’, ‘Resilient Communities’ and, indeed, what we mean by ‘communities’, explaining communities of ‘place’ or geography and communities of interest. It outlines our twelve step Enabling Communities model and provides a link to our online Enabling Communities Toolkit which includes 19 different ‘tools’ that communities can use to develop their project or activity.
2.2	The previous version of the Enabling Communities Strategy included a list of ‘Enabling Actions’ – things that the Council does to deliver its ambitions around Enabling Communities. This section of the document has now been structured around the four priorities in the ‘Enabling Our Communities’ section of the Strategic Plan – ‘Community Partnerships’, ‘Taking Positive Action on What Matters Most’, ‘Maximising Health, Wellbeing and Safety in our District’ and

	'Community Pride'.
2.3	The Strategy talks about resilient communities and the fact that a resilient community is one that is 'strong and quick to recover when things go wrong'. The revised Strategy uses the community response to the Covid-19 pandemic as an example of resilience, and highlights the Council's role in enabling that response (with funding, advice and practical support) and filling the gaps in less resilient communities, rather than doing things 'to' communities.

### 3 How to address current situation

3.1	The Strategy has been updated to ensure that it feels more current and aligns better to the Councils Strategic Plan, but much of the core content is the same. The ethos of the Strategy is our ambition as a Council to help communities to help themselves rather than doing things to or for them and encouraging communities to build on existing assets – what they already have that is strong – rather than focussing on what is wrong or missing.
3.2	It also highlights the importance of being data-led to ensure that our work is targeted to those people, communities and areas that most need our help and not just those who shout the loudest.

### 4 Reason for recommendation

4.1	The Enabling Communities Strategy has been revised and updated to better reflect the priorities set out in the Enabling Our Communities section of the 'We Are East Suffolk' Strategic Plan.
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## Appendices

### Appendices:

<b>Appendix A</b>	Draft Enabling Communities Strategy 2021-2024
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### Background reference papers:

None.

## EAST SUFFOLK ENABLING COMMUNITIES STRATEGY

### Introduction

The Councils' Strategic Plan (2020-2024) identifies five areas which we believe will be important for East Suffolk over the next four years – economic growth, value for money, digital transformation, our environment and **enabling communities**.

This Enabling Communities Strategy explains what we mean by 'enabling communities' and how East Suffolk Council will work with communities and our partners to **enable** local people and groups to do more. This means that we will help communities to do what they want to do, rather than doing things 'to' or 'for' them. In other words, we will help communities to help themselves.

We also want communities to take advantage of the positive things (the assets) that already exist within their local area, and not just focus on problems and needs. This is called an **'asset-based' approach**.

Communities approach us for support with lots of different projects – such as buying and running a community building as a hub for young people, securing a site for affordable homes for local people or setting up a project to support those with dementia and their carers. This Strategy shows how the Council will work, with its partners, to help our communities to make projects like these a reality. We already work closely with East Suffolk communities to improve the environment, the economy and the social life of the area – all things that make services, and life, better for everyone.

### What is our vision for East Suffolk communities?

We want East Suffolk communities to thrive – to be vibrant, resilient and able to help themselves. National research has identified some things that make communities resilient including healthy, engaged people who feel included and are proud of where they live, good access to green spaces, food, water, energy, services, jobs and housing, and strong links to other places and communities. A **resilient** community is one that is strong and quick to recover when things go wrong.

Covid-19 is a prime example of a test to community resilience. The response from East Suffolk communities to the pandemic was amazing, groups quickly formed to provide food, help with accessing prescriptions and mental wellbeing support to the most vulnerable members of their community. Our role as a Council was to enable that response – with advice, information and funding – and to fill in the gaps where communities were less resilient.

We will work with all of our partners – including Town and Parish Councils and the County Council, health (our Clinical Commissioning Groups and Public Health), schools, Suffolk Police, businesses and the voluntary sector, including Community Action Suffolk, to help East Suffolk communities to be resilient. We work with other organisations because we

want our combined resources (money and people) to have the biggest possible impact.

We want to build the skills and knowledge of East Suffolk communities so that they can do more for themselves, rather having things done ‘for’ or ‘to’ them. This ensures that skills stay in the community and can be used for future community projects. Our role includes helping people to identify what matters most to them – what they most want to do or change. Sometimes views about what is most important will differ and so we need to talk about these differences and agree together what should happen first.

Some communities will need more help and support than others and some communities do not need or want our help at all. There are lots of examples of communities doing things for themselves, spending less money and giving better end results for local people and places.

We will work with communities to explore new ways of interacting and engaging with us and each other through digital platforms and similar, as well as utilising more traditional engagement approaches (surveys, meetings and events) to ensure as many people can engage on local issues and tell us what is important to them as possible.

### What do we mean by ‘communities’?

Each of us belongs to lots of different ‘communities’ at the same time. Within each **geographical community** (where people live), there are lots of **communities of ‘interest’**. Communities of interest are groups of people who care about similar things - for example farming, a church or an on-line forum - or have things in common, for example being lesbian/gay, a young mum, of a similar age or having impaired hearing.

### What does an ‘asset based’ approach mean?

Often communities and the organisations that work with them focus on ‘fixing’ things that are wrong, rather than looking at what is already in the community that could help.

Working in this way is called an ‘asset based’ approach because it starts with assets – what’s strong – and not with what’s wrong. Assets are people, groups and things in the community. The most important asset is the people in the community who have the knowledge, energy and enthusiasm to make things happen.

If communities understand what they have that’s strong that they can build on, they can think about the gap between what they want / need and what they already have. They can also agree what is most important to tackle first. This works better than trying to do everything at once.

## How can communities support individuals and families?

Lots of support is needed by some individuals and families in our communities. Some people struggle to cope, particularly when lots of things happen to them at the same time. For example a frail older person might be more in need of support than usual if they have a fall, have no local family and live in a rural area without any transport, or an unemployed young person might drink too much or take drugs and stop going to school when a close family member dies.

Communities can help find the individuals and families who might need more support and think about whether the community itself can give that support, as they did during the Covid-19 pandemic. This often means that people can get the help they need sooner. We want communities to work with communities to protect and support people; keeping them safe in their own homes and in the community.

People often do not ask for help until a problem is too much for them to handle on their own. We want people to get help earlier - before their problems get serious. We will also help individuals to 'help themselves' so that things don't become more serious.

It is important that people look after their own mental and physical health and wellbeing. This includes managing what are known as 'long term conditions' such as diabetes, dementia, depression, heart disease and arthritis. We want to help people to make good choices, ensure that they do not put themselves or others at risk and encourage them to look out for and after each other.

## The East Suffolk Enabling Communities model

We think that there are twelve steps for communities to follow. We have called this our Enabling Communities model. For each of the steps, there are organisations, people or things that can help.

We want to help communities to access the right support (if and when they need it) from the right organisation at the right time.

<b>STEP 1: What's Strong?</b>	Map existing community assets (people, groups, buildings, money and things)
<b>STEP 2: What's Wrong?</b>	Understand current (now) and future (later) needs
<b>STEP 3: What's the gap?</b>	Identify the gap between your assets (what's strong), needs (what's wrong) and aspirations (hopes for the future)
<b>STEP 4: What's most important?</b>	Agree what you want to achieve (outcomes) and in what order (priorities)
<b>STEP 5: What's the best solution?</b>	Agree how to tackle your priorities (and achieve your outcomes)



<b>STEP 6: What help do we need?</b>	Identify sources of advice, information and support
<b>STEP 7: What's getting in our way?</b>	Identify and remove (or manage) any barriers or blockers
<b>STEP 8: Who can lead?</b>	Identify community champions to lead your project. Give them the tools that they need
<b>STEP 9: Who can give time?</b>	Find (formal or informal) volunteers and ensure you understand their skills and interests
<b>STEP 10: What resources do we need</b>	Secure new resources or use existing resources differently
<b>STEP 11: Do IT!</b>	Work together to make your project happen
<b>STEP 12: What difference have we made?</b>	Measure and understand your impact. Celebrate your success!

## Enabling Communities Toolkit

The Council has produced a 'toolkit' which has 19 different 'tools' that you could use to engage local people in your project or activity and get their views about what is most important. The toolkit includes Asset Mapping, Community Visioning and Ideas Walls and can be found at [Enabling Communities Toolkit » East Suffolk Council](#).

## What help and support is available to 'enable' communities?

We want to make sure that we do not just work with those who shout the loudest but find those individuals, families and communities who need our help the most. One way of doing this is using data and intelligence to help us to target our work to those areas that most need our support.

We produced a data pack for each of our eight Community Partnerships which includes lots of useful statistics about the local area. The Community Partnerships used these data packs to identify a set of priorities – the most important things for them to tackle. You can find your Data Pack [here](#). Another great source of information about your community/area is the Suffolk Observatory – [follow the link below](#).

Councillors (District, County and Town/Parish) are community leaders and engage, inspire and represent their communities. Councillors can make sure that all the different voices within a community are heard and support local community champions - people who put time and energy into making things better in their community. You can find your East Suffolk Councillor [here](#).

Communities can get help from ‘enablers’ – usually paid staff who have ‘community development’ or ‘capacity building’ as part of their role, for example in the District Council, County Council, Community Action Suffolk, voluntary sector organisations, and some Parish Councils. Each of the eight East Suffolk Community Partnerships has a support officer – a Communities Officer – you can find your Communities Officer [here](#). The ‘enablers’ can help to identify appropriate support for you/your project, for example training for committee member or help to develop a project plan.

Community Action Suffolk provide advice and support on a wide range of subjects from setting up a Good Neighbour Scheme (GNS) to Volunteering and managing Community Buildings. Become a Member of CAS (FREE) now! [Link to website](#)

Suffolk Community Foundation is an invaluable source of information and advice about funding from local organisations and donors. Their website includes all the giving programmes that are currently live. [Link to website](#)

Information about East Suffolk Council funding programmes, including Councillor Enabling Communities Budgets, can be found at [Community grants and funding » East Suffolk Council](#)

Different departments within the District and County Councils, and a range of other organisations, can provide specialist advice and guidance, for example about economic development, regeneration, planning, highways, housing, coast and flood management, tourism, public health, resort and countryside management, charitable structures, education, social business models and many more.

## East Suffolk Council Enabling Communities Priorities

Our Enabling Communities priorities, set out in the new East Suffolk Strategic Plan are:

### Community Partnerships

***We will facilitate community partnerships to connect people and places at a local level, encourage collective problem solving and ensure a needs-based approach to delivering local solutions to local issues, building upon local assets. We will enable all East Suffolk voices to be heard.***

#### Enabling Actions:

- We have set up eight Community Partnerships. Each Community Partnership has a total of £85,000 of funding to March 2023 for community projects to tackle their top priorities
- There is an overarching Community Partnership Board which has just over £1 million to spend by March 2023 – initial priorities for East Suffolk are Social Isolation / Loneliness, Transport and Mental Wellbeing
- Suffolk Association of Local Councils and Community Action Suffolk are working with us to support Town and Parish Councils and voluntary and community sector organisations to get involved in the eight Community Partnerships
- Community Action Suffolk is leading a piece of work around ‘rural proofing’ to ensure that the needs of rural communities are not overlooked
- Each of our fifty-five Councillors has an Enabling Communities Budget of £7,500 per year to support projects in the ward that they represent

### Taking positive action on what matters most

***We will use data and community intelligence as the basis for working with communities and partners to do the right things in the right places. This will mean less duplication, shared resources and a better experience for individuals, families and communities. We will take a targeted, place-based approach to tackling, deprivation, hidden needs and the challenges of rural areas – helping communities to access the tools to identify and tackle their own needs.***

#### Enabling Actions:

- We lead and fund three partnerships – Lowestoft Rising, Felixstowe Forward and Leiston Together - which bring partners together to co-ordinate work in these three towns
- We set up East Suffolk Youth Voice to enable the views and needs of young people to feed into our work, including the Community Partnerships
- We support the Waveney Youth Council and organise an annual Youth Take Over Day

- We support the Suffolk Coastal and Waveney Disability Forums and events to highlight the needs of those with a range of disabilities in our communities
- We fund Disability Advice North East Suffolk to advocate for and support disabled people
- Our Hidden Needs Grant Programme supports community-led projects that tackle Social Isolation and Loneliness (grants of up to £10,000)
- We fund the Suffolk Funding Portal to enable local groups to quickly identify potential sources of funding for projects
- We set up a Period Poverty project which provides access to free sanitary products in different public locations in our communities
- We fund the three Citizens Advice that cover East Suffolk to enable them to provide a range of support, including financial advice, to vulnerable individuals and families
- Citizens Advice also deliver the Suffolk Advice and Support Service set up to support people in financial need during Covid-19
- We provide practical support and funding for community hubs through our grant schemes (including Bounce Back grants to help community buildings to open back up following Covid-19). Community Action Suffolk provide a whole range of information and practical support to community buildings in Suffolk
- Various teams in the Council provide support and advice to Neighbourhood Plan groups, we also support town and parish plans and village reviews
- We have transferred Council assets (including play parks, allotments, buildings, countryside sites and common land) into community ownership
- We support communities to list assets of community value under the 'Right to Bid' legislation. More than 40 assets have been listed in East Suffolk including pubs, allotments, village greens, community buildings and shops.
- We advise on Housing Needs Surveys to identify housing needs in individual East Suffolk communities and work with Community Land Trusts to meet housing needs that are identified

## **Maximising health, wellbeing and safety in our District**

***We will provide the environment and opportunities for everyone to lead healthy, active, fulfilling and safe lives. We will connect communities together and help individuals and families to be more resilient, achieve their full potential and age well. We will ensure our communities are safe, helping communities to address issues as early as possible.***

### **Enabling Actions:**

- We work with our health colleagues (in the Clinical Commissioning Groups) to support Social Prescribing across the District which is delivered through five local VCSE organisations who use a 'person-centred' approach to connect people to sources of support in their community

- We work with partners to support community safety initiatives including Prevent (Preventing Violent Extremism) awareness raising, Domestic Abuse Forums, Town Pastors, Speedwatch, Pubwatch and Nightsafe
- We support area-based Anti-Social Behaviour meetings to enable joint problem solving and encourage shared ownership of solutions
- Through Suffolk Family Focus we employ staff who provide in-depth support for families with chaotic lifestyles
- We work in partnership to deliver Crucial Crew Plus in schools for 13-15-year-olds focussing on different dimensions of personal safety including online safety, consent, drugs and alcohol and grooming
- We enable a range of community-led interventions to reduce social isolation including Men's Sheds, Meet Up Mondays, Good Neighbour Schemes, Dementia projects, Talking Benches (in conjunction with CAS and Rural Coffee Caravan)
- We facilitate intergenerational projects and activities which bring together older and younger people in communities, working with schools and care homes
- We have funded more than 100 Grandpads – simplified tablets that are loaned to older people without IT kit or Wifi to enable them to stay connected to friends and family
- We want to enable more 'Compassionate Communities' to help and support people at the end of life and their friends and families (led by St Elizabeth's Hospice)
- We help to deliver the Fit and Fed summer activities programmes during the school holidays
- We support a range of health-focussed events and activities including Women's and Men's Cycle Tours and associated community activity, Operation Camouflage at Rock Barracks, Park Runs and Fit Villages

## **Community Pride**

***We want everyone to be proud of where they live, and we will support this by helping people to come together around a shared sense of purpose, responsibility, place, care and respect for each other. We will support places to be culturally rich.***

### **Enabling Actions:**

- We fund Community Action Suffolk to provide Business and Project Planning support to community groups and voluntary sector organisations
- CAS also have a voluntary and community sector 'Health Check'
- We help communities to put on community events e.g. Street Parties
- We are involved in developing the Suffolk Volunteering Strategy which focusses on raising the profile of volunteering, supporting people to volunteer and engaging employers in providing volunteering opportunities
- We encourage staff volunteering through our new Employer Supported Volunteering (ESV) scheme

- Community Action Suffolk host the Volunteer Suffolk Website which includes a wealth of information about volunteer opportunities across the county
- Our Funding Team can help community groups to identify funding, including through sources such as the Suffolk Community Foundation
- Infolink is a countywide online database that includes information about local groups and activities



## CABINET

Tuesday, 04 May 2021

<b>Subject</b>	Adoption of Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document
<b>Report of</b>	Councillor David Ritchie Cabinet Member with responsibility for Planning and Coastal Management
<b>Supporting Officer</b>	Laura Mundy Principal Planner (Policy and Delivery) <a href="mailto:Laura.Mundy@eastsoffolk.gov.uk">Laura.Mundy@eastsoffolk.gov.uk</a> 01394 444556

Is the report Open or Exempt?	OPEN
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Category of Exempt Information and reason why it is <b>NOT</b> in the public interest to disclose the exempt information.	Not applicable.
<b>Wards Affected:</b>	All Wards

## Purpose and high-level overview

### Purpose of Report:

The purpose of this report is to adopt the Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document. The Supplementary Planning Document supports the implementation of the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy, which mitigates for the impact of increased housing growth on protected Habitat Sites. The Supplementary Planning Document provides a framework for implementing the provisions set out in the strategy, and also includes information for developers and applicants to assist them in meeting the other requirements under the Conservation of Habitats and Species Regulations 2017 (as amended).

### Options:

Adopt the Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document. This will mean the Council has an up-to-date Supplementary Planning Document to guide the implementation of the Recreational Disturbance Avoidance and Mitigation Strategy.

An alternative option would be to not adopt the Supplementary Planning Document and continue to implement the Strategy without the additional guidance. However this would be a missed opportunity to provide further clarification on the requirements of the Strategy, and address some of the frequently asked questions that come about through the development management process.

### Recommendations:

1. That the Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document be adopted.
2. That the Head of Planning and Coastal Management, in consultation with the Cabinet Member with responsibility for Planning and Coastal Management, be authorised to make any presentational or typographical amendments to the Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document prior to it being published.

## Corporate Impact Assessment

### Governance:

No Impacts.

### ESC policies and strategies that directly apply to the proposal:

The Supplementary Planning Document supports the implementation of the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy.

Policy WLP8.34 of the Waveney Local Plan and policy SCLP10.1 of the Suffolk Coastal Local Plan include a commitment to producing a Supplementary Planning Document to support the implementation of the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy.



**Environmental:**

The Supplementary Planning Document supports the implementation of the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy, which mitigates for the impact of increased housing growth on protected Habitat Sites. This approach is in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended).

**Equalities and Diversity:**

No Impacts.

An Equality Impact Assessment Screening Opinion was produced to accompany consultation on Supplementary Planning Document in October 2020 (Appendix E). The Supplementary Planning Document was also subject to separate Equality Impact Analysis (ref: EQIA325595691) in April 2021. Both assessments concluded no differential negative impacts on those with protected characteristics.

**Financial:**

The production and adoption of the Supplementary Planning Document is covered by the existing budget of the Planning Policy and Delivery Team. The measures set out in the Recreational Disturbance Avoidance and Mitigation Strategy will be funded through a per-house tariff, collected through the development management process.

**Human Resources:**

No Impacts.

**ICT:**

No Impacts.

**Legal:**

The Supplementary Planning Document has been produced in accordance with the Town and Country Planning (Local Plans) (England) Regulations 2012 (as amended). The Supplementary Planning Document supports the implementation of the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy, which delivers against the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended).

**Risk:**

There are no risks envisaged in relation to the implementation of the recommendations.

**External Consultees:**

In accordance with the Town and Country Planning (Local Plans) (England) Regulations 2012 (as amended) the draft Supplementary Planning Document was subject to consultation. Further details are set out in the Consultation Statement appended to this report (Appendix B). This includes a list of consultees, respondents and their comments.

## Strategic Plan Priorities

Select the priorities of the <a href="#">Strategic Plan</a> which are supported by this proposal: (Select only one primary and as many secondary as appropriate)		Primary priority	Secondary priorities
<b>T01</b>	<b>Growing our Economy</b>		
P01	Build the right environment for East Suffolk	<input type="checkbox"/>	<input type="checkbox"/>
P02	Attract and stimulate inward investment	<input type="checkbox"/>	<input type="checkbox"/>
P03	Maximise and grow the unique selling points of East Suffolk	<input checked="" type="checkbox"/>	<input type="checkbox"/>
P04	Business partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P05	Support and deliver infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
<b>T02</b>	<b>Enabling our Communities</b>		
P06	Community Partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P07	Taking positive action on what matters most	<input type="checkbox"/>	<input type="checkbox"/>
P08	Maximising health, well-being and safety in our District	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P09	Community Pride	<input type="checkbox"/>	<input type="checkbox"/>
<b>T03</b>	<b>Maintaining Financial Sustainability</b>		
P10	Organisational design and streamlining services	<input type="checkbox"/>	<input type="checkbox"/>
P11	Making best use of and investing in our assets	<input type="checkbox"/>	<input type="checkbox"/>
P12	Being commercially astute	<input type="checkbox"/>	<input type="checkbox"/>
P13	Optimising our financial investments and grant opportunities	<input type="checkbox"/>	<input type="checkbox"/>
P14	Review service delivery with partners	<input type="checkbox"/>	<input type="checkbox"/>
<b>T04</b>	<b>Delivering Digital Transformation</b>		
P15	Digital by default	<input type="checkbox"/>	<input type="checkbox"/>
P16	Lean and efficient streamlined services	<input type="checkbox"/>	<input type="checkbox"/>
P17	Effective use of data	<input type="checkbox"/>	<input type="checkbox"/>
P18	Skills and training	<input type="checkbox"/>	<input type="checkbox"/>
P19	District-wide digital infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
<b>T05</b>	<b>Caring for our Environment</b>		
P20	Lead by example	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P21	Minimise waste, reuse materials, increase recycling	<input type="checkbox"/>	<input type="checkbox"/>
P22	Renewable energy	<input type="checkbox"/>	<input type="checkbox"/>
P23	Protection, education and influence	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>XXX</b>	<b>Governance</b>		
XXX	How ESC governs itself as an authority	<input type="checkbox"/>	<input type="checkbox"/>

### How does this proposal support the priorities selected?

This Supplementary Planning Document supports the implementation of the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy, which includes measures to protect some of the most important natural environments, recognised internationally for their ecological value. This directly supports the delivery of Strategic Plan priorities P03 and P23 which seek to protect and enhance the unique natural environment of East Suffolk.

The approach set out in the strategy and Supplementary Planning Document also supports the delivery of priority P08 as the continued protection of the natural environment brings with it health and well-being benefits by ensuring residents have access to high quality natural open space. Maintaining the special characteristics of these unique habitat sites

ensures a rich array of biodiversity across the East Suffolk area which supports Strategic Plan priority P20.

## Background and Justification for Recommendation

1 Background facts	
1.1	The Conservation of Habitats and Species Regulations (2017) (as amended) provide protection for sites that are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species. The network consists of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Both types can also be referred to as European Sites. The National Planning Policy Framework (NPPF) states that Ramsar sites should be afforded the same level of protection and refers to SACs, SPAs and Ramsar sites as 'Habitat Sites'.
1.2	As competent authorities under the Conservation of Habitats and Species Regulations (2017) (as amended), local planning authorities need to ensure that plans and projects under their jurisdiction do not lead to adverse effects on the integrity of European sites.
1.3	Both Local Plans for the district include residential site allocations and support the delivery of new housing. The Habitat Regulation Assessments produced as part of the Local Plan process both identified a risk of increased recreational disturbance at Habitat Sites as a result of planned housing growth.
1.4	To address the impact of housing growth on Habitat Sites, East Suffolk Council, Ipswich Borough Council, Mid Suffolk District Council and Babergh District Council have worked in partnership to produce the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy. The strategy set outs a tariff based approach to funding measures to mitigate the impact of increased recreational disturbance arising from housing growth. A per-house tariff is collected on relevant developments at the planning application stage. These funds are then consolidated and used to deliver a suite a mitigation measures as set out in the Strategy.
1.5	The Supplementary Planning Document has been drafted in discussion with the other partner organisations. Ipswich Borough Council adopted an equivalent Supplementary Planning Document in February 2020. Babergh District Council and Mid Suffolk District Council are proceeding with the implementation of RAMS without a Supplementary Planning Document, until such time as the new joint Local Plan for Babergh and Mid Suffolk is in place.
1.6	As the mitigation of identified impacts is a requirement of the Conservation of Habitats and Species Regulations (2017) (as amended) and was set out in the Local Plan Habitat Regulation Assessment reports, it is not necessary to have a Supplementary Planning Document in place in order to collect the tariff or implement the measures. On this basis, the tariff is already being collected on relevant planning applications. The Supplementary Planning Document, however, provides an opportunity to clarify the requirements of the Strategy, and address some of the frequently asked questions that come about through the development management process. The Supplementary Planning Document also includes information for developers and applicants to assist them in meeting the other requirements under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations).

1.7	Policy WLP8.34 of the Waveney Local Plan and Policy SCLP10.1 of the Suffolk Coastal Local Plan include a commitment to producing a Supplementary Planning Document to support the implementation of the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy.
1.8	The preparation of the Supplementary Planning Document was overseen by the Local Plan Working Group.
1.9	The process for production of Supplementary Planning Documents is set out in the Town and Country Planning (Local Plans) (England) Regulations 2012 (as amended). This requires the Council to undertake consultation to inform the production of the Supplementary Planning Document and, as a minimum, requires that the draft document is published for four weeks and that during that time it is available on the Council's website and that hard copies are available for inspection in the Council's offices.
1.10	The Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document was published for a seven-week public consultation between 19 <sup>th</sup> October and the 7 <sup>th</sup> December 2020.
1.11	Due to the social distancing restrictions and the national lockdown as the result of the Covid-19 pandemic, libraries and other public spaces were not accessible during the consultation period. Therefore, paper copies of documents could not be made available at these locations. Physical copies of documents were, however, sent out on request.
1.12	Further details of the consultation are set out in the Consultation Statement which is appended to this report (Appendix B).
1.13	<p>A total of 28 individuals and organisations responded to the consultation, making a total of 44 comments. The full consultation responses have been published on the Council's website and summarised in the appended consultation statement (Appendix B). The main issues raised through the consultation were:</p> <ul style="list-style-type: none"> <li>• General support for the approach, including from Natural England as the appropriate nature conservation body.</li> <li>• Some querying of the approach to defining the areas in which the tariff will be collected.</li> <li>• Some querying of the tariff levels and whether they would be sufficient to fund all measures. Conversely some questioning of whether the tariff was too high and if viability considerations could therefore be taken into account.</li> <li>• Support for the provision of alternative/ additional measures as part of developments.</li> <li>• Requests for further information on the types of development and applications that the tariff will be applied to.</li> <li>• Requests for further links to the main strategy within the Supplementary Planning document.</li> </ul>
1.14	<p>Changes have been made to address many of the comments received, including:</p> <ul style="list-style-type: none"> <li>• Updated references to European Sites, now referred to as Habitat Sites.</li> <li>• Expanded explanation of impacts of recreational disturbance on Habitat Sites.</li> <li>• Added web links to the main Recreational Disturbance Avoidance and Mitigation Strategy.</li> <li>• Added reference to the HRA record template that is being used in Development Management.</li> </ul>

	<ul style="list-style-type: none"> <li>Added reference to permission in principle to clarify that RAMS will apply in these cases.</li> </ul> <p>In addition, some minor wording changes were suggested by Natural England which have been incorporated in the final Supplementary Planning Document.</p>
1.15	Under the Environmental Assessment of Plans and Programmes Regulations 2004 screening was carried out on the draft Supplementary Planning Document to determine whether a full Strategic Environmental Assessment would be required. The screening concluded that this was not required. The final Strategic Environmental Assessment Screening Opinion is appended to this report (Appendix C).
1.16	Habitat Regulations Assessment screening was also undertaken which concluded that implementation of the Supplementary Planning Document would not lead to likely significant effects on protected Habitat sites and that it is therefore not considered necessary to undertake an Appropriate Assessment. The final Habitat Regulations Assessment Screening Statement is appended to this report (Appendix D).
1.17	The final Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document is appended to this report (Appendix A).

## 2 Current position

2.1	As the mitigation of identified impacts is a requirement of the Conservation of Habitats and Species Regulations (2017) (as amended) and was set out in the Local Plan Habitat Regulation Assessment reports, it is not necessary to have a Supplementary Planning Document in place in order to collect the tariff or implement the measures. On this basis, the tariff is already being collected on relevant planning applications. However the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy is a long and technical document and the Supplementary Planning Document provides an opportunity to summarise the key provisions of the Strategy.
2.2	Policy WLP8.34 of the Waveney Local Plan and Policy SCLP10.1 of the Suffolk Coastal Local Plan include a commitment to producing a Supplementary Planning Document to support the implementation of the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy.

## 3 How to address current situation

3.1	In addition to delivering against the requirements set out in the Local Plans, the new Supplementary Planning Document provides a helpful guide for applicants, clarifying the requirements of the Strategy, and addressing some of the frequently asked questions that come about through the development management process.
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## 4 Reason for recommendation

4.1	To deliver against the requirements set out in the Local Plans and support the implementation of the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy which mitigates for the impact of increased housing growth on protected Habitat Sites.
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## Appendices

### Appendices:

<b>Appendix A</b>	Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document
<b>Appendix B</b>	Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document – Consultation Statement
<b>Appendix C</b>	Habitats Regulations Assessment of the Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document
<b>Appendix D</b>	Strategic Environmental Assessment Screening Opinion of the Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document
<b>Appendix E</b>	Equality Impact Assessment Screening Opinion, produced to accompany consultation, October 2020.

### Background reference papers:

Date	Type	Available From
May 2019	Suffolk Coast Recreational Disturbance, Avoidance and Mitigation Strategy	<a href="https://www.eastsuffolk.gov.uk/planning/developer-contributions/rams/">https://www.eastsuffolk.gov.uk/planning/developer-contributions/rams/</a>
March 2019	East Suffolk Council- Waveney Local Plan	<a href="https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/">https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/</a>
September 2020	East Suffolk Council- Suffolk Coastal Local Plan	<a href="https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/">https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/</a>
April 2021	Equality Impact Analysis (Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document)	Available on Request



# **Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (SPD)**

A guide to implementing the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy

**April 2021**







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# 1. Introduction

1. The coast, heaths and estuaries of Suffolk are internationally recognised wildlife assets. They include areas designated as Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar Sites (hereafter referred to as 'Habitat Sites'). These habitats and the species they hold are protected by UK legislation and the international Ramsar Convention.
2. Allowing recreation at these Habitat Sites has numerous benefits including raising awareness, bringing revenue to support vulnerable habitat sites and improving health and wellbeing. Recreation can however bring pressure to sensitive wildlife features and if not managed appropriately, can result in habitat deterioration and species population decline. Intensive recreation pressure can cause fragmentation of habitats and isolate populations of the species for which the sites are designated, including those of a number of internationally important wildfowl and wading birds.
3. New residential growth brings new residents to the local area, and if those residents use the Habitat sites for recreation, which evidence suggests, this then increases the pressure on Habitat Sites as a consequence. Assessing, avoiding and managing recreation pressure is therefore an important part of planning for growth.

## 1.1 The Recreational Disturbance Avoidance and Mitigation Strategy

4. New housing growth brings new residents to the local area, and if those residents use the Habitat Sites for recreation, which evidence suggests is likely, then pressure is increased on those Habitat Sites. Assessing, avoiding and managing that recreation pressure is therefore an important part of planning for growth.
5. To address this, East Suffolk Council (formally Suffolk Coastal District Council and Waveney District Council), Ipswich Borough Council, Mid Suffolk District Council and Babergh District Council commissioned a Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). This strategy set out a tariff based approach to mitigating the impact of recreational disturbance on Habitat Sites resulting from increased housing development across the Local Authority areas. The strategy facilitates development, whilst at the same time adequately protecting Habitat Sites from harm. The Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) can be viewed online at: <https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf>

## 1.2 Purpose of the Supplementary Planning Document

6. This Supplementary Planning Document, summarises the requirements of Suffolk Coast RAMS, including the per-dwelling tariff, and provides a framework for implementing those provisions. The Supplementary Planning Document also includes information for developers and applicants to assist them in meeting the other

requirements under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations)<sup>1</sup>.

7. This Supplementary Planning Document provides information to support the implementation of policies set out in the Councils' Local Plans, and is a material planning consideration in the development management process.
8. Initially, this Supplementary Planning Document was produced for East Suffolk District Council and Ipswich Borough Council. Although partners to the Suffolk Coast RAMS project, Babergh District Council and Mid Suffolk District Council are proceeding with the implementation of RAMS without a Supplementary Planning Document, until such time as the new joint Local Plan for Babergh and Mid Suffolk is in place.

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<sup>1</sup> [www.legislation.gov.uk/uksi/2017/1012/pdfs/ukxi\\_20171012\\_en.pdf](http://www.legislation.gov.uk/uksi/2017/1012/pdfs/ukxi_20171012_en.pdf)

## 2. The Recreational Disturbance Avoidance and Mitigation Strategy (RAMS)

### 2.1 Policy Background

9. Where a Habitat Site could be affected by a plan or project then a Habitats Regulations Assessment must be undertaken by the competent authority<sup>2</sup>. This identifies the ecological interest features of the site (such as birds, plants or animals); how they could be potentially harmed by the proposed plan or project; and assesses whether the proposed plan or project could cause that harm to occur.
10. The Local Plan Habitat Regulations Assessments for Ipswich Borough Council, Babergh District Council and Suffolk Coastal District Council (now the southern part of East Suffolk) concluded that without mitigation the level of residential growth proposed would be likely to have significant negative impacts on Habitat Sites through increased recreational use by the additional residents.
11. In response to this, East Suffolk Council (formerly Suffolk Coastal District Council and Waveney District Council), Ipswich Borough Council and Babergh District Council, with support from Natural England, jointly commissioned a Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). The inclusion of Mid Suffolk District Council and Waveney District Council (the latter now being part of East Suffolk) was triggered by the advice of Natural England. This Strategy set out a tariff based approach to mitigating the impact of recreational disturbance on Habitat Sites resulting from increased residential development across the Local Authority areas. The Strategy allows development, whilst at the same time adequately protecting Habitat Sites from harm.
12. Approaching mitigation strategically through a partnership approach ensures maximum effectiveness of conservation outcomes and cost efficiency.
13. Where a Habitat Site could be affected by a plan or project then a Habitats Regulations Assessment (HRA) screening must be undertaken. If this cannot rule out any possible likely significant effect on the Habitat Site, either alone or in combination with other plans and projects, without mitigation, then an Appropriate Assessment must be undertaken. The Appropriate Assessment identifies the interest features of the site (such as birds, plants or coastal habitats), how they could be harmed, and assesses whether the proposed plan or project could have an adverse effect on integrity of the Habitat Site (either alone or in combination with other plans and projects), and how this could be mitigated.

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<sup>2</sup> Further guidance on this is available from the Council's website at:  
<https://www.eastsuffolk.gov.uk/planning/developer-contributions/rams/>

14. The Council have developed a Habitat Regulation Assessment (HRA) Record<sup>3</sup> which provides guidance, agreed with Natural England. This will be used when intending to consent relevant development and in undertaking its Appropriate Assessment.

## 2.2 Habitat Sites

15. The coast, heaths and estuaries of Suffolk are internationally recognised wildlife assets. They include areas designated as Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar Sites. These habitats and the species they hold are protected by UK and the international Ramsar Convention.
16. The RAMS report includes a review of the Habitat Sites within and around the Local Planning Authority boundaries in combination with an analysis of current and predicted future housing growth. This concluded that twelve Habitat Sites should be the focus of the Suffolk Coast RAMS report (see Appendix 1 for details).

## 2.3 Zone of Influence

17. Zones of influence are areas from within which it is deemed there will be likely significant effects arising from additional residents living within the zone and travelling to Habitat sites for recreation. This determines where new development may result in changes in recreation and therefore where mitigation will be necessary. Each Habitat Site has a zone of influence of 13km.
18. The evidence underpinning the methodology for defining the zone of influence is detailed in the RAMS report. Two separate tariff zones are identified:
- Zone A - reflects the zone of influence to the Stour and Orwell Special Protection Area (SPA) and Ramsar and the Deben SPA and Ramsar; and
  - Zone B - relates to all the relevant Habitat Sites apart from the Stour and Orwell.

## 2.4 The Tariff

19. The zones of influence are used to determine the contribution that needs to be made for each new residential dwelling built.

Zone	Tariff
Zone A	£121.89 per dwelling
Zone B	£321.22 per dwelling

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<sup>3</sup> <https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-Coast-RAMS-HRA-Record.pdf>

20. It should be noted that some residential schemes, particularly those located close to a Habitat Site boundary or large scale developments, are likely to need to provide additional mitigation measures (in addition to the tariff) such as Suitable Alternative Natural Green Space (SANGS) or green infrastructure measures such as enhanced walking routes and connections to the Public Right of Way network. This would need to be assessed through a project level Habitats Regulations Assessment (HRA) (including Appropriate Assessment). The Local Planning Authority, in consultation with Natural England, will advise on these cases through the pre-application process.
21. The tariff will be indexed linked, with a base date of 2019 and will be reviewed periodically. The Per house tariffs may be subject to change throughout the lifetime of the Strategy, as housing figures are reviewed again over time, and in response to more detailed understanding of costs, and as measures are implemented and monitored for effectiveness. Any revisions to the tariff will be published via the Council's website.

### 3. Making a Planning application

- 22. Development Management Officers will apply the Suffolk Coast RAMS requirements and this Supplementary Planning Document in their consideration of residential development proposals.
- 23. Project level Habitat Regulations Assessments (HRAs) (including Appropriate Assessments) will still be required. The Suffolk Coast RAMS streamlines these Habitat Regulations Assessments (HRAs) but undertaking an HRA does not negate the need to pay the RAMS tariff.

#### 3.1 What types of development does this apply to?

- 24. The requirements of Suffolk Coast RAMS and this Supplementary Planning Document apply to all new residential developments where there is a net increase in dwelling numbers. This includes, for example, the conversion of existing large townhouses into smaller flats, or the change of use of other buildings to dwellings. It also includes new tourist accommodation. It excludes replacement dwellings and extensions to existing dwellings (where there is no net gain in dwelling numbers). Applicants are advised to contact the Local Planning Authority if in any doubt as to whether their development is within the scope of the Suffolk Coast RAMS and this Supplementary Planning Document.
- 25. Certain restricted development types may be excluded from the Suffolk Coast RAMS. These include nursing homes, where the residents will be those in need of daily nursing care and therefore unable to undertake outdoor recreation. Residential annexes are also excluded, as they do not result in independent dwellings. The Strategy does not cover potential effects arising from non-residential development, employment growth or infrastructure improvements. Other projects that may cause recreational disturbance at Habitat Sites will need to undertake their own Habitat Regulation Assessments (HRAs).

#### 3.2 What types of application does this apply to?

- 26. The Suffolk Coast RAMS tariff applies to all full applications, outline applications, permitted development, permission in principle, variation of condition applications and reserved matters applications where no contribution was made at the outline stage.
- 27. The General Permitted Development Order (GPDO) allows for the change of use of some buildings and land to Class C3 (dwelling houses), with this development subject to prior approval. The Suffolk Coast RAMS will apply to such developments.
- 28. Sites that already have planning permission will not be required to pay any additional mitigation sum, unless they are resubmitted for consideration.



### 3.3 When and how do I pay the contribution?

29. Contributions must be paid to the Local Planning Authority before the commencement of development, unless otherwise agreed.
30. The Suffolk Coast RAMS is payable in addition to any Community Infrastructure Levy (CIL) liability and/or any other S106 or S278 contributions. There may also be other site-specific mitigation requirements that will need to be addressed in addition to the RAMS.
31. Planning obligations are legally binding on the landowner (and any successor in title).
32. The possible mechanisms for securing contributions are detailed below. Development Management officers will advise on the most appropriate mechanism during the course of the application process.

**1. S111, Upfront Payment:** Where a financial contribution towards the Suffolk Coast RAMS is required and there are no other Section 106 planning obligations associated with the application, the payment can either be made upfront. Further details are available on the Council's website at: <https://www.eastsuffolk.gov.uk/planning/developer-contributions/rams/>

**2. Unilateral Undertaking:** A draft template Unilateral Undertaking is available from the Council. This can be completed by applicants themselves or with the assistance of a solicitor. This should be submitted alongside the planning application. The undertaking must be submitted with the site location plan, and the land title plan and register printed from Land Registry within the previous 3 months (title documents can be sourced from [HM Land Registry](#)) or a copy of the title deeds certified by a solicitor.

**3. S106:** In the case of larger or more complicated developments, the most appropriate route for securing contributions will be via a multi-party Section 106 Agreement.

33. Applicants must submit a Heads of Terms document for the Section 106 Agreement, identifying these requirements and specifying their agreement to enter into a planning obligation. Heads of Terms should be provided at the point of submission of the planning application.

### 3.4 Legal / Admin fees

34. Developers or land owners are expected to meet the Local Planning Authority's legal fees associated with any drafting, checking and approving any deed. These legal fees are in addition to the statutory planning application fee, and the contribution itself, and must be reasonable. Details of the Local Planning Authority's current legal fees can be found on the Council's website.

### **3.5 What if I don't get planning permission or choose not to implement my planning permission?**

35. The tariff will be refunded minus a small administrative charge.

### **3.6 Do I have to pay the Suffolk Coast RAMS tariff?**

36. Under the Habitats Regulations, a development which is assessed as having a likely significant effect on the integrity of a Habitat Site, either alone or in-combination with other plans and projects, must provide mitigation or otherwise must satisfy the tests of demonstrating 'no alternatives' and 'reasons of overriding public interest'.

37. Residential development within the RAMS zone of influence must demonstrate that the impact of that development (either alone or in-combination with other plans and projects) on protected sites can be mitigated. Natural England would be consulted and would need to be satisfied that all impacts were being mitigated. Payment of the RAMS tariff is one option for providing that mitigation.

38. The alternative would be for the developer to gather their own evidence for a project level Habitats Regulations Assessment (HRA) and then to secure the necessary bespoke mitigation measures for delivery in perpetuity. This assessment would likely have a much higher cost than if the developer were to make a contribution to the implementation of the RAMS.

### **3.7 How will the tariff be spent?**

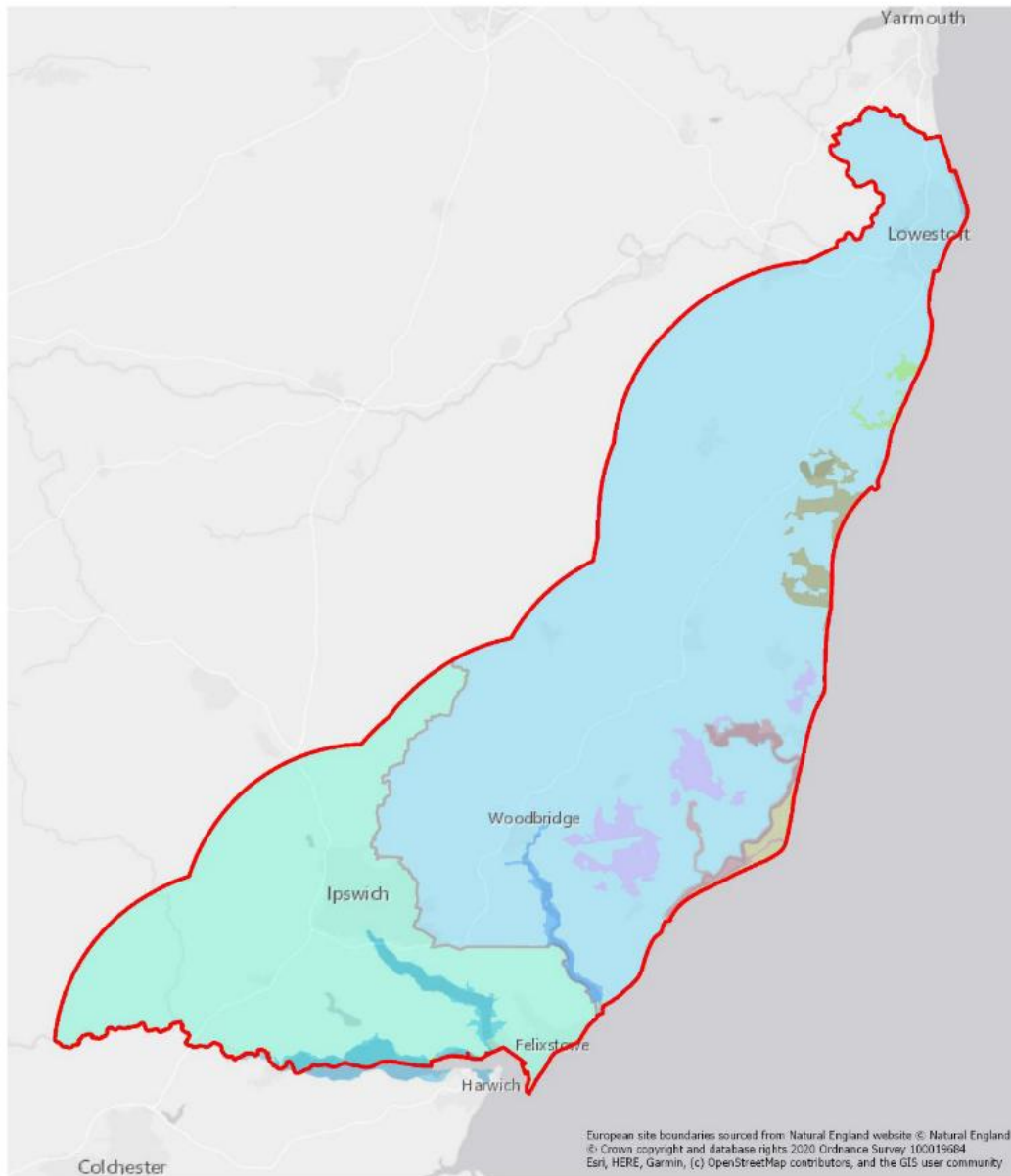
39. A list of strategic projects is listed in the Strategy document (see: <https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf>). The order in which projects come forward will be determined by an Executive Group who will oversee the implementation of the Strategy. Senior officers from each authority will be represented within the Executive Group to provide the necessary authority and decision making. Natural England will also input into the Executive Group in an advisory capacity. A dedicated Delivery Officer gives assurance that the whole project will be effectively managed and delivered.

## Appendix 1: Summary of sites relevant to the Suffolk Coast RAMS

Habitat site	Interest Feature
Alde-Ore Estuary SPA	<ul style="list-style-type: none"> <li>• Ruff</li> <li>• Avocet</li> <li>• Marsh Harrier</li> <li>• Redshank</li> <li>• Lesser Black-Backed Gull</li> <li>• Sandwich Tern</li> <li>• Little Tern</li> </ul>
Alde-Ore Estuary Ramsar	<ul style="list-style-type: none"> <li>• Ramsar criterion 2: The site supports a number of nationally-scarce plant species and British Red Data Book invertebrates</li> <li>• Ramsar criterion 3: The site supports a notable assemblage of breeding and wintering wetland birds</li> <li>• Ramsar criterion 6: Bird species/populations occurring at levels of international importance (Lesser Black-backed Gull, Avocet, Redshank)</li> </ul>
Benacre to Easton Barents SPA	<ul style="list-style-type: none"> <li>• Little Tern</li> <li>• Bittern</li> <li>• Marsh Harrier</li> </ul>
Deben Estuary SPA	<ul style="list-style-type: none"> <li>• Dark-Bellied Brent Goose</li> <li>• Avocet</li> </ul>
Deben Estuary Ramsar	<ul style="list-style-type: none"> <li>• Ramsar criterion 2: Supports a population of the mollusc <i>Vertigo angustior</i></li> <li>• Ramsar criterion 6: Species/populations occurring at levels of international importance (Dark-bellied Brent Goose)</li> </ul>
Minsmere-Walberswick Heaths & Marshes SAC	<ul style="list-style-type: none"> <li>• H4030 European dry heaths</li> <li>• H1210 Annual vegetation of drift lines</li> <li>• H1220 Perennial vegetation of stony banks</li> </ul>
Minsmere – Walberswick SPA	<ul style="list-style-type: none"> <li>• Teal</li> <li>• Bittern</li> <li>• Marsh Harrier</li> <li>• Hen Harrier</li> <li>• European Nightjar</li> <li>• Northern Shoveler</li> <li>• Gadwall</li> <li>• Avocet</li> <li>• Little Tern</li> <li>• White-Fronted Goose</li> </ul>

Minsmere-Walberswick Ramsar	<ul style="list-style-type: none"> <li>• Ramsar Criterion 1: The site contains a mosaic of marine, freshwater, marshland and associated habitats, complete with transition areas in between. Contains the largest continuous stand of reedbeds in England and Wales and rare transition in grazing marsh ditch plants from brackish to fresh water.</li> <li>• Ramsar criterion 2: This site supports nine nationally scarce plants and at least 26 red data book invertebrates, including the mollusc <i>Vertigo angustior</i>.</li> <li>• An important assemblage of rare breeding birds associated with marshland and reedbeds.</li> </ul>
Orfordness-Shingle Street SAC	<ul style="list-style-type: none"> <li>• H1210 Annual vegetation of drift lines</li> <li>• H1220 Perennial vegetation of stony banks</li> <li>• H1150 Coastal lagoons</li> </ul>
Sandlings SPA	<ul style="list-style-type: none"> <li>• European nightjar</li> <li>• Woodlark</li> </ul>
Stour and Orwell Estuaries SPA	<ul style="list-style-type: none"> <li>• Black-tailed godwit</li> <li>• Knot</li> <li>• Dunlin</li> <li>• Waterbird assemblage</li> <li>• Redshank</li> <li>• Grey plover</li> <li>• Dark-bellied brent goose</li> <li>• Northern pintail</li> <li>• Pied avocet</li> </ul>
Stour and Orwell Estuaries Ramsar	<ul style="list-style-type: none"> <li>• Ramsar criterion 2: Contains seven nationally scarce plants: stiff saltmarsh-grass; small cord-grass; perennial glasswort; lax-flowered sea lavender and the eelgrasses <i>Zostera angustifolia</i>, <i>Z. marina</i> and <i>Z. noltei</i>.</li> <li>• Ramsar criterion 2: Contains five British Red Data Book invertebrates: the muscid fly <i>Phaonia fusca</i>; the horsefly <i>Haematopota grandis</i>; two spiders, <i>Arctosa fulvolineata</i> and <i>Baryphema duffeyi</i>; and the endangered swollen spire snail <i>Mercuria confusa</i>.</li> <li>• Ramsar criterion 5: Wintering waterfowl assemblage</li> <li>• Ramsar criterion 6: Species/populations occurring at levels of international importance (Redshank, Dark-bellied Brent Goose, Pintail, Grey Plover, Knot, Dunlin, Black-tailed Godwit)</li> </ul>

## Appendix 2: Map of Zones of Influence



- Overall Zone of Influence
- Zone A
- Zone B
- Alde-Ore Estuary SPA/Ramsar
- Benacre to Easton Bavents SPA
- Deben Estuary SPA/Ramsar
- Minsmere-Walberswick SPA/SAC/Ramsar
- Orfordness-Shingle Street SAC
- Sandlings SPA
- Stour and Orwell Estuaries SPA/Ramsar

## Glossary of Terms

**Avoidance measures:** Actions that avoid the occurrence of significant effects arising from a plan or project on Habitat Sites

**Competent Authority:** The decision maker under the Conservation of Habitats and Species Regulations 2017 (as amended) often the local authority, but could be a planning inspector or other body responsible for assessing a plan or project for approval. The four local planning authorities who are implementing the Suffolk Coast RAMS are competent authorities.

**Development Plan Document (DPD):** A Local Development Document which forms part of the statutory Development Plan, examples include the Core Strategy and Area Action Plans.

**European Sites:** an ecological network of sites (SPAs and SACs) established under the Habitats Directive and Wild Birds Directive to provide a strong protection for Europe's wildlife areas. Para 176b of the National Planning Policy Framework (NPPF, 2019) states that Ramsar sites should be given the same protection as Habitats sites.

**Green Infrastructure:** a strategic, planned network of natural, semi-natural and artificial features and networks designed and managed to deliver a wide range of ecosystem services and quality of life benefits.

**Habitat fragmentation:** the process by which habitat loss results in the division of larger, continuous habitats into smaller, more isolated remnants. Fragmentation disrupts ecological processes, isolates species populations and leads to reduced species richness (i.e. reduced biodiversity).

**Habitats Regulations Assessment:** An assessment undertaken by a competent authority, to determine the nature and extent of any potential impacts on Habitat sites arising from a plan or project. The assessment is undertaken where a competent authority is undertaking, or giving authorisation for a plan or project.

**Habitats Sites:** The term used in National Planning Policy Framework to refer to SACs, SPAs and Ramsar Sites. See 'European Sites'.

**Local Development Document:** comprising two types, Development Plan Documents and Supplementary Planning Documents, which together form the Local Development Framework.

**Mitigation Measures:** Actions that minimise the potential effects arising from a plan or project on a Habitat Site.

**Natural England:** The UK government public body responsible for caring for England's natural environment.

**Ramsar Site:** An internationally important wetland site designated under the Ramsar Convention 1971.

**Suitable Alternative Natural Greenspaces (SANGs):** the name given to greenspace that is of a quality and type suitable to be used as mitigation to offset the impact of new development.

**Special Area of Conservation (SAC):** Areas defined by regulation 13 of the Conservation of Habitats and Species Regulations 2017 (as amended) which have been given special protection as important conservation sites.

**Special Protection Area (SPA):** Areas classified under regulation 15 of the Conservation of Habitats and Species Regulations 2017 (as amended) which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds.

**Supplementary Planning Document (SPD):** Documents which add further detail to the policies in the Development Plan. They can be used to provide further guidance for development on specific sites, or on particular issues. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the Development Plan.

**Zone of Influence (Zoi):** established to provide an indication of the geographical extent to which recreation pressure may impact each Habitat Site.

# Consultation Statement

Agenda Item 6

ES/0749

## Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) Supplementary Planning Document

February 2021





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# 1 Introduction

1. New residential growth brings new residents to the local area, and if those residents use protected Habitat sites for recreation, this then increases the pressure on those Habitat Sites. Assessing, avoiding, and managing recreation pressure is therefore an important part of planning for growth. To address this, East Suffolk Council, Ipswich Borough Council, Mid Suffolk District Council and Babergh District Council commissioned a Recreational Disturbance Avoidance and Mitigation Strategy (RAMS)<sup>1</sup>. This strategy set outs a tariff based approach to mitigating the impact of recreational disturbance on Habitat Sites resulting from increased housing development across the Local Authority areas.
2. The Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (RAMS SPD), summarises the requirements of Suffolk Coast RAMS, including the per-dwelling tariff, and provides a framework for implementing those provisions. The Supplementary Planning Document also includes information for developers and applicants to assist them in meeting the other requirements under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations)<sup>2</sup>.
3. The RAMS SPD has been produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The SPD provides information to support the implementation of policies set out in the Councils' Local Plans, and once adopted will become a material planning consideration in the development management process.
4. The Council's approach to engagement in the preparation of a Supplementary Planning Document is set out in the Statement of Community Involvement<sup>3</sup>. While preparing the RAMS SPD East Suffolk Council has consulted with relevant organisations and members of the public. Details of this consultation process are set out below.

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<sup>1</sup><https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf>

<sup>2</sup> [www.legislation.gov.uk/uksi/2017/1012/pdfs/uksi\\_20171012\\_en.pdf](https://www.legislation.gov.uk/uksi/2017/1012/pdfs/uksi_20171012_en.pdf)

<sup>3</sup> <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/statement-of-community-involvement-and-local-development-scheme/>

## 2. Preparation of the Draft Document

5. To reflect the approach taken by the wider RAMs project, the RAMS SPD was drafted in collaboration with the other Local Planning Authorities within the RAMS partnership (Ipswich Borough Council, Babergh District Council and Mid Suffolk District Council) although adoption of individual SPDs is being progressed separately. Ipswich Borough Council have adopted their SPD<sup>4</sup>, and Babergh District Council and Mid Suffolk District Council are proceeding with the implementation of RAMS without a Supplementary Planning Document, until such time as the new joint Local Plan for Babergh and Mid Suffolk is in place.
6. The approach to the implementation of the RAM Strategy, and therefore the content of the RAMS SPD, has been informed by early engagement with key local stakeholder through the RAMS Working Group. A workshop meeting of the RAMS working group was held in December 2019. A list of organisations involved in the RAMS working group is included in Appendix 2.
7. Within East Suffolk, the Planning Policy and Delivery Team worked in collaboration with the following groups and teams within the Council as part of the preparation of the RAMS SPD:
  - East Suffolk Council Development Management Team
  - East Suffolk Council Major Sites and Infrastructure Team
  - East Suffolk Council Local Plan Working Group

## 3. Public Consultation

8. Following the production of the Draft RAMS SPD, a seven-week public consultation took place between **19<sup>th</sup> October** and the **7<sup>th</sup> December 2020**. The draft RAMS SPD was published at the same time as consultations on the draft Statement of Community Involvement (SCI) and the emerging Cycling and Walking Strategy. The RAMS SPD consultation was advertised alongside the SCI using posters, a press release and social media posts. The poster and an example Twitter post that accompanied these consultations can be found in Appendix 3. Those on the Council's planning policy consultation database were contacted directly by email or letter and the list of consultation bodies can be found in Appendix 1.

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<sup>4</sup> <https://www.ipswich.gov.uk/content/suffolk-coast-rams-supplementary-planning-document-spd>

9. The consultation documents were made available on the East Suffolk Council website at:

<https://eastsuffolk.inconsult.uk/consult.ti/DraftRAMSSPD2020/consultationHome>

10. Comments on the draft RAMS SPD could be made directly through the Council's website. Comments were also accepted via email and letter. A summary of the comments received and the Council's response are set out in Appendix 4.
11. Due to the social distancing restrictions and the national lockdown as the result of the Covid-19 pandemic, libraries and other public spaces were not accessible during the consultation period. Therefore, paper copies of documents could not be made available at these locations. Physical copies of documents were, however, sent out on request.
12. A total of 28 individuals and organisations responded to the consultation, making 44 individual comments.
13. Full copies of the consultation responses have been published on the Council's website at:  
<https://eastsuffolk.inconsult.uk/consult.ti/DraftRAMSSPD2020/consultationHome>

## Appendix 1: Consultation Bodies

### **Specific consultation bodies**

The Coal Authority  
 Environment Agency  
 Historic England  
 Marine Management Organisation  
 Natural England  
 Network Rail  
 Highways Agency  
 Suffolk County Council  
 Parish and Town Councils within and adjoining the East Suffolk District  
 Suffolk Constabulary  
 Adjoining local planning authorities – Ipswich Borough Council, Babergh District Council, Mid Suffolk District Council, South Norfolk District Council, Great Yarmouth Borough Council and the Broads Authority  
 NHS England and the Care Commissioning Groups  
 Anglian Water  
 Essex and Suffolk Water  
 Homes England  
 Electronic communication companies who own or control apparatus in the District  
 Relevant gas and electricity companies

### **General consultation bodies**

Voluntary bodies some or all of whose activities benefit any part of the District  
 Bodies which represent the interests of different racial, ethnic or national groups in the District  
 Bodies which represent the interests of different religious groups in the District  
 Bodies which represent the interests of disabled persons in the District  
 Bodies which represent the interests of persons carrying on business in the District

### **Other individuals and organisations**

Includes local businesses, high schools, individuals, local organisations and groups, planning agents, developers, landowners, residents and others on the Local Plan mailing list.

## Appendix 2: RAMS Working Group members

- Babergh Mid Suffolk Councils
- East Suffolk Council
- Ipswich Borough Council
- ABP (Associated British Ports) Ipswich Docks
- Alde-ore Partnership
- Suffolk Coast and Heaths AONB Unit
- Blyth Estuary Partnership
- Coastal Partnership East
- Deben Estuary Partnership
- Environment Agency
- Felixstowe Forward
- Port of Felixstowe
- Forestry England
- Greenways
- Harwich Haven Authority
- Inshore Fisheries and Conservation Authorities
- Marine Management Organisation
- National Trust
- Natural England
- Norse
- RSPB
- Suffolk Biodiversity Information Service
- Shotley Open Spaces
- Suffolk County Council
- Suffolk Wildlife Trust
- Suffolk Yacht Harbour

## Appendix 3: Consultation Poster and Twitter Post

 **EASTSUFFOLK COUNCIL**

Consultation period  
19 October to 07 December 2020

# HOW DO YOU WANT TO ENGAGE WITH LOCAL PLANNING?

Local planning identifies sites for new housing and employment and sets out policies to shape future development.

## What are we doing?

We would like to hear your views on how we can better engage you in the planning process.

We have prepared a draft Statement of Community Involvement which sets out how we could engage with the community as we create planning documents and determine planning applications.

## How can you get involved?

### COMPLETE A QUESTIONNAIRE

Help us by answering seven key questions about how you think we should involve the community in planning.

### COMMENT ON THE DOCUMENT

The draft 'Statement of Community Involvement' sets out our proposals for community engagement in the planning process. Let us know your thoughts on this draft.

**Find out more and give your views:**  
**[www.eastsuffolk.gov.uk/planningpolicy](http://www.eastsuffolk.gov.uk/planningpolicy)**

Alternatively, please send comments to:  
East Suffolk Council, Planning Policy & Delivery Team, Riverside, 4 Canning Road, Lowestoft, Suffolk NR33 0EQ

 [planningpolicy@eastsuffolk.gov.uk](mailto:planningpolicy@eastsuffolk.gov.uk)  
 01394 444557 / 01502 523029

### Other consultations

We are also seeking views on a new Supplementary Planning Document mitigating the impact of new housing development on protected habitat sites. Visit [www.eastsuffolk.gov.uk/planningpolicy](http://www.eastsuffolk.gov.uk/planningpolicy) to find out more and give your views.





## Appendix 4: Responses to the Draft RAMS Supplementary Planning Document

Name/ Organisation	Comment ID/ Ref	Type of response	Comment Summary	Council Response	Action
John Milne	1	Observation	Tariff seems very low to compensate for such significant damage.	The tariff set out in the SPD is taken from the RAMS Strategy where the approach is fully evidence. The tariff is based on a comprehensive assessment of housing delivery, the impacts of that development and the cost of mitigation measures. Full details are set out here: <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf</a> It is not considered necessary to repeat this level of detail in the SPD.	None.
Michelle Golding	2	Observation	Why does Zone A avoid Beccles quay?	The RAMS zones detailed in the SPD are taken from the RAMS Strategy where the approach is fully evidence.  Zones of influence were established in response to evidence to provide an indication of the geographical extent to which recreation pressure may be relevant for each Habitat site, i.e.	None.

				<p>the geographical zone around each Habitat site, within which new housing may pose a risk in terms of additional recreation pressure.</p> <p>Full details are set out here:  <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf</a> </p>	
Karrie Langdon	3	Observation	<p>When reviewing the impact on the environment the overall effect should reflect the impact on the whole area to ensure the habitats are not fragmented. Natural corridors for wildlife are an essential part to maintain a healthy eco-system.</p>	Noted.	None.
Sally Batten	4	Objection	<p>I would like to see a much more generous amount of land allocated to SANGS per development.</p>	<p>A number of site allocations within the Local Plans include a requirement to deliver SANG. Where green infrastructure requirements are identified through the development management process, the Council will apply Natural England's advice which is set out in annex 1 of the Habitat Regulation Assessment Record template:</p>	<p>Link added at paragraph 14 to HRA record and associated Natural England advice.</p>

				<a href="#">Suffolk-Coast-RAMS-HRA-Record.pdf (eastsuffolk.gov.uk)</a>  As set out in the SPD this would need to be assessed through a project level Habitats Regulations Assessment (HRA) and the Local Planning Authority, in consultation with Natural England, will advise on these cases.	
Ubbeston Parish Council	5		Ubbeston Parish Council are aware that housing developments need to happen, but not at the expense of our local habitat and area. Various developments have recently happened in small villages that has caused noise pollution during the year, in what should be a very peaceful area. Council feels that noise assessments need to be looked at in depth not to spoil the tranquility of the area.	Noted, but not relevant to SPD.	None.
Norfolk County Council	6	Observation	1) It should be made clear how new camping and caravan sites will fit into the strategy as they also contribute to increased recreational impacts but are not covered in the document;	1) The SPD is clear that the RAMS tariff does apply to new tourist accommodation and applicants are advised to contact the Council to discuss if necessary. Mitigation requirements may need to be	Link added at paragraph 14 to HRA record and associated Natural England advice.

			<p>2) Development sites should provide facilities for on-site recreation (for example, for the morning and evening dog walk) for multiple user groups.</p> <p>3) It is recommended that East Suffolk provide guidance (draft template) as to the content of any Habitat Regulation Assessment (HRA) as there can be wide variability in quality/validity of evidence provided by applicants.</p>	<p>identified through a project level Habitats Regulations Assessment (HRA).</p> <p>2) Where green infrastructure requirements are identified, the Council will apply Natural England's advice which is set out in annex 1 of the Habitat Regulation Assessment Record template: <a href="https://eastsuffolk.gov.uk/Suffolk-Coast-RAMS-HRA-Record.pdf">Suffolk-Coast-RAMS-HRA-Record.pdf</a> (<a href="https://eastsuffolk.gov.uk">eastsuffolk.gov.uk</a>) As set out in the SPD, this would need to be assessed through a project level Habitats Regulations Assessment (HRA).</p> <p>3) The Council has produced a Habitat Regulation Assessment Record template: <a href="https://eastsuffolk.gov.uk/Suffolk-Coast-RAMS-HRA-Record.pdf">Suffolk-Coast-RAMS-HRA-Record.pdf</a> (<a href="https://eastsuffolk.gov.uk">eastsuffolk.gov.uk</a>) This does not form part of the SPD to allow it be updated to reflect current best practice as needed. However, agree that including a link to the HRA record template would be useful.</p>	
Levington & Stratton Hall Parish Council	7	Objection	Although there is reference to a tariff-based application to housing developments within a	The RAMS zones detailed in the SPD are taken from the RAMS Strategy where the approach is	Link added at paragraph 14 to HRA record and

			<p>Zone of Influence of 13km, should this be more like 20km.</p> <p>It is essential that alternatives to crowding protected sites are provided, such as Suitable Alternative Natural Green Space [SANGS] and other suggested alternatives. Without additional residential developments, the area is already well visited and any detrimental impact should be mitigated by ensuring there is no additional car parking in the area and narrow rural lanes are retained and protected.</p>	<p>fully evidence. Zones of influence were established in response to evidence to provide an indication of the geographical extent to which recreation pressure may be relevant for each Habitat site, i.e. the geographical zone around each Habitat site, within which new housing may pose a risk in terms of additional recreation pressure. Full details are set out here:  <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf</a></p> <p>A number of site allocations within the Local Plans include a requirement to deliver SANG. Where green infrastructure requirements are identified through the development management process, the Council will apply Natural England's advice which is set out in annex 1 of the Habitat Regulation Assessment Record template:  <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf">Suffolk-Coast-RAMS-HRA-Record.pdf (eastsuffolk.gov.uk)</a></p>	<p>associated Natural England advice.</p>
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				As set out in the SPD this would need to be assessed through a project level Habitats Regulations Assessment (HRA) and the Local Planning Authority, in consultation with Natural England, will advise on these cases.	
Woodbridge Town Council	8	Objection	The RAMS report indicates that in many places the boundary between the two zones is an arbitrary one, and not one based on data. Woodbridge Town Council would like the boundary of the northern zone to reach down to the Deben estuary to more properly reflect the impact on the areas in the northern zone.	The RAMS zones detailed in the SPD are taken from the RAMS Strategy where the approach is fully evidence. Zones of influence were established in response to evidence to provide an indication of the geographical extent to which recreation pressure may be relevant for each Habitat site, i.e. the geographical zone around each Habitat site, within which new housing may pose a risk in terms of additional recreation pressure. Full details are set out here: <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf</a> However, for the purposes of implementation, it is necessary to define a simple and pragmatic	None.

				approach which can be applied without unnecessary complications for administration and therefore, in places, the zone boundaries have been adjusted.	
Karrie Langdon	9	Objection	As the council has declared an environment emergency and the pressing need to support biodiversity within residential areas and funding actions to increase biodiversity, then new housing developments must include designs to promote these values. If a housing development will pay this tariff to mitigate the impact on a habitat. The development should be required to add to the biodiversity of the area to promote wildlife. For example to plant more hedges rather than putting up a fence. The hedge must be supporting of local endangered species of moths and butterflies. The gardens should be landscaped with plants that support insects and wildlife. If there are specific species that can be supported then the plants to be used within the landscape should be	The purpose of the RAMS strategy and SPD is to provide a strategic mitigation scheme to address the impacts of increased recreational disturbance at Habitat Sites arising as the result of new residential development. The Local Plans include policy requirements relating to broader biodiversity measures (see Policy SCLP10.1 of the Suffolk Coastal Local Plan and Policy WLP8.34 of the Waveney Local Plan).	None.

			stipulated as part of the development.		
Boyton Parish Council	10	Support/ Observation	We support a system of mitigation funding to address small-scale, cumulative recreational impacts on sensitive areas, induced by new home development. This is a pragmatic approach, with lower transaction costs than full impact assessment. The proposed tariffs do not, however, appear sufficiently high to counter potential impacts, given that the tariffs appear to be one-off payments yet the impacts will recur year-on-year (thus effectively in perpetuity).	Support noted. The tariff set out in the SPD is taken from the RAMS Strategy where the approach is fully evidence. The tariff is based on a comprehensive assessment of housing delivery, the impacts of that development and the cost of mitigation measures. Where appropriate, the ongoing costs of mitigation measures are taken into account as part of the tariff calculation (up to 15 years of funding). Full details are set out here (see table 6): <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf</a> It is not considered necessary to repeat this level of detail in the SPD.	None.
Boyton Parish Council	11	Objection	We do not support the proposed system applying to all new homes within a 13km boundary. New homes very near to sensitive areas (e.g., within 5km) may have genuinely significant impacts which will continue to need	The zones of influence were established in response to evidence to provide an indication of the geographical extent to which recreation pressure may be relevant for each Habitat site, i.e. the geographical zone around	None.



			<p>specific consideration of appropriate mitigation and appropriate funding to support that mitigation (which is likely in many cases to be considerably more than the small-scale tariffs suggested here).</p>	<p>each Habitat site, within which new housing may pose a risk in terms of additional recreation pressure.</p> <p>The approach, as set out in the SPD, does take into account that some development, by virtue of its proximity to a Habitat site, may require additional mitigation measures beyond the RAMS contribution. This would need to be assessed through a project level Habitats Regulations Assessment (HRA) (including Appropriate Assessment). Where appropriate, the ongoing costs of some mitigation measures are taken into account as part of the tariff calculation (up to 15 years of funding). Full details are set out here (see table 6):  <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf</a> It is not considered necessary to repeat this level of detail in the SPD.</p>	
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Westerfield Parish Council	12	Support	Westerfield Parish Council support the policies of the District Council in protecting habitats and consider that this Supplementary Planning Document should be adopted.	Support noted.	None.
Martlesham Parish Council	13	Objection	Is the Ramsar site on the Deben in Zone A or B? It seems to fit both definitions and the map at App 2 shows it in Zone B.	As shown on the map in Appendix 2 of the SPD, the Deben sites fall within tariff Zone B. However, the wording in the SPD reflects the fact that zone of influence specific to the Deben does extend into Zone A. Further detail on how the Zones of Influence have been established is set out in section 6 of the Strategy ( <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf</a> )	None.
Martlesham Parish Council	14	Observation	How would the measures be financed and maintained over time, especially ongoing services such as wardens?	Where appropriate, the ongoing costs of mitigation measures (including wardens) are taken into account as part of the tariff calculation (up to 15 years of funding). Full details are set out here (see table 6): <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Section-</a>	None.

				<a href="#">106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf</a>	
Cllr Rachel Smith-Lyte, East Suffolk Council	15	Observation	All of these sites and wonderful species are already at risk from recreational disturbance and no amount of money paid to the Council can mitigate for their loss. We need better public information and better enforcement to actually stop this behaviour.	A key measure within the strategy is the funding of a small, mobile team of wardens to provide an on-site presence, talk to visitors, and influence visitor behaviour. Further detail on the role of wardens can be found in Section 8 of the Strategy: <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf</a> As the SPD is focused on the mechanisms for the collection of the tariff, is not considered necessary to repeat this level of detail in the SPD.	None.
Cllr Rachel Smith-Lyte, East Suffolk Council	16	Observation	Section 106's offer little protection from those sites being developed later on - they can be overturned after a period of time and development takes place anyway.	Habitat sites are protected from development under the Conservation of Habitats and Species Regulations 2017 (as amended).	None.
Cllr Rachel Smith-Lyte, East Suffolk Council	17	Objection	These sites and species stand to be decimated if Sizewell C and/or 'Freeport' at Felixstowe and Harwich gets the go ahead. Ergo the very thing/reason that people	The purpose of the RAMS strategy and SPD is to mitigate for the impact of increased recreational disturbance arising as the result of new residential	None.

			want to live here will be no more, the golden goose killed. Once the habitats are gone so would the wildlife be.	development. It does not seek to address impacts arising from other development such as major infrastructure projects. Development outside the remit of RAMS will need to address any likely significant effects through bespoke mitigation measures.	
Cllr Rachel Smith-Lyte, East Suffolk Council	18	Objection	We don't need ALL the new housing we're being told we have to take. Our council should be pushing back harder to Westminster etc. on this and the onus should be on them to justify the need, not the other way around. We need to join the dots better and complain, loudly! Our fragile and precious coast and heaths and associated species need us.	The purpose of the RAMS strategy and SPD is to provide a strategic mitigation scheme to address the impact of increased recreational disturbance at Habitat sites arising as the result of new residential development. The SPD cannot be used to challenge housing figures which are established through the Local Plan process.	None.
Joanna Barfield	19	Observation	The existence of these internationally recognised sites in Suffolk underlines the problem of over-development for housing.	Comment noted.	None.
Beccles Town Council	20	Observation	Could the boundary be extended to include Beccles, particularly as the town has close links with those areas of the protected habit sites as they are on our doorstep to visit.	The RAMS zones detailed in the SPD are taken from the RAMS Strategy where the approach is fully evidence. Zones of influence were established in response to evidence to provide an indication	None

				<p>of the geographical extent to which recreation pressure may be relevant for each Habitat site, i.e. the geographical zone around each Habitat site, within which new housing may pose a risk in terms of additional recreation pressure. Full details are set out here:</p> <p><a href="https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf</a></p> <p>Any change to zone boundaries would need to be informed by a review of the evidence underpinning the Strategy.</p>	
Bourne Leisure Ltd	21	Objection	<p>We question the principle of simply cross applying the tariff to tourist accommodation– this should not be a ‘one-size-fits-all’ strategy and needs to acknowledge that a more nuanced, proportionate approach is required to ensure a reasonable share of the mitigation cost if impacts on European wildlife sites are likely.</p>	<p>The SPD is clear that RAMS tariff does apply to new tourist accommodation and applicants are advised to contact the Council to discuss the relevance of the RAMS to their proposed development. Mitigation requirements may need to be identified through a project level Habitats Regulations Assessment (HRA) and this is set out in the SPD.</p>	None.

			<p>The 13km zone of influence around each of the European wildlife seems 'generous', particularly when compared to the examples of other zones of influence applied at other European sites by local authorities elsewhere,</p> <p>The zone north of the River Blyth is even larger than 13km; this is justified in the Technical Paper on the basis of needing to address movements of Little Terns along the coast outside the European sites. This represents a deviation from the strategy applied to the other locations in the Technical Paper where the focus is on the designated European sites, not the activities of individual species beyond these sites. This will have a compound effect on tourist accommodation sites north of Lowestoft.</p> <p>Any tariff required to mitigate the impacts of new tourist accommodation should fairly and reasonably relate to the</p>	<p>The RAMS zones detailed in the SPD are taken from the RAMS Strategy where the approach is fully evidence. Zones of influence were established in response to evidence to provide an indication of the geographical extent to which recreation pressure may be relevant for each Habitat site, i.e. the geographical zone around each Habitat site, within which new housing may pose a risk in terms of additional recreation pressure. Full details are set out here:  <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf</a></p> <p>As detailed in the strategy, north of the River Blyth, the key concern from recreation pressure is Little Terns. Evidence has shown that these are mobile along the coast, nesting directly on the beaches and have nested at locations such as Kessingland that are outside the Habitat sites. It is therefore appropriate to</p>	
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			<p>accommodation type and usage proposed and thus should be pro-rata that of the residential rate. Where it can be demonstrated by evidence included with planning applications that any net additional tourist accommodation will not result in additional recreational visits to protected European Sites, a RAMS payment should not be required if the Council accepts the evidence.</p>	<p>respond to this evidence by extending the zone along the coast to encompass the whole northern part of Waveney District. This makes a pragmatic and logical boundary around Lowestoft. This also provides a zone of influence up to the northern boundary of Suffolk, where the Norfolk strategic mitigation commences for Great Yarmouth Borough.</p>	
<p>Broads Authority</p>	<p>22</p>	<p>Objection</p>	<p>Paragraph underneath the table – are additional measures required as well as the tariff? It is not clear as written.</p>	<p>This wording highlights that some development may require additional mitigation measures in addition to payment of the tariff. It would not be possible, or appropriate, to define all the circumstances in which this might be necessary within the SPD.</p> <p>Some guidance is included in the advice from Natural England which is set out in annex 1 of the Habitat Regulation Assessment Record template: <a href="#">Suffolk-Coast-RAMS-HRA-Record.pdf (eastsuffolk.gov.uk)</a> Agree to add a link to this advice to paragraph 14 of the SPD.</p>	<p>Link added at paragraph 14 to HRA record and associated Natural England advice.</p>

Broads Authority	23	Observation	<p>Regarding extensions and annexes not being charged the tariff, if more people will be inhabiting a changed dwelling, why does this not count? It seems that the tariff relates to dwellings and not people. Why is that?</p> <p>What about residential moorings and gypsy and traveller sites? Do they pay the tariff?</p>	<p>The tariff has been calculated on the basis of a net increase in dwellings and this approach is detailed in the Strategy <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf</a></p> <p>Annexes and extension are not included as they do not constitute a net increase in dwellings.</p> <p>As set out in the SPD, other uses that might result in increased recreational pressure on Habitat sites, will need to be assessed through a project level Habitats Regulations Assessment (HRA) and the Local Planning Authority, in consultation with Natural England, will advise on these cases.</p>	
Broads Authority	24	Observation	<p>What about permission in principle? That may become more of a prominent way of gaining permission if the Changes to the Current Planning System consultation ideas are taken forward.</p>	<p>Regulation 63 of the Conservation of Habitats and Species Regulations (2017) (as amended) requires that the council, as a competent authority, must undertake an Appropriate Assessment before giving any</p>	<p>Amend paragraph 26, section 3.2 to read:  “...The Suffolk Coast RAMS tariff applies to all full applications,</p>



				consent, permission or other authorisation for a plan or project which is likely to have a significant effect on a Habitat site. Therefore, the measures in the SPD will apply equally to a permission in principle application as it would a standard application. Agree to add refence into section 3.2 of the SPD to clarify that permission in principle applications are RAMS liable.	outline applications, permitted development, <b><u>permission in principle</u></b> , variation of condition applications and reserved matters applications..."
Broads Authority	25	Objection	What is the strategy document referred to? It is not clear.	Agree, references to the Strategy to made clearer.	Links to RAMS strategy added to paragraph 4 and paragraph 38.
Felixstowe Town Council	26	Observation	The SPD should provide a quick reference to the main delivery elements of the Strategy that developers and decision makers need to have regard for within development proposals and determinations. Such as: <ul style="list-style-type: none"> <li>• What is RAMS?</li> <li>• How is it calculated?</li> <li>• Who pays and how much, and when?</li> <li>• Who holds the funding and how is this governed?</li> </ul>	Alongside the Strategy and SPD, the Council produced a list of answers to frequently asked questions and this is available on the Council's website at: <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-Coast-Recreational-Disturbance-Avoidance-Mitigation-Strategy-FAQ.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-Coast-Recreational-Disturbance-Avoidance-Mitigation-Strategy-FAQ.pdf</a>	None.

				These do not form part of SPD in order that they can be updated in response to any issues arising.	
Gladman Developments Ltd	27	Objection	<p>Should sites provide mitigation through other means (i.e. SANG) we would query whether the measures proposed would lead to 'double dipping' for essentially the same form of green infrastructure. The CIL regulations seek to avoid 'double dipping'</p> <p>Flexibility should be provided to ensure sustainable development opportunities are delivered without pressure from development viability. This may include the phasing of payments/ infrastructure alignment with the delivery of housing on a site rather than requiring upfront payment.</p> <p>The SPD should cross reference to viability. Specifically, the Council should not seek to jeopardise housing delivery and seek to negotiate an appropriate level of financial contribution that can reasonably be provided without</p>	<p>As set out in section 3.6 of the SPD under the Habitats Regulations, a development which is assessed as having a likely significant effect on the integrity of a Habitat site, either alone or in-combination must provide mitigation or otherwise must satisfy the tests of demonstrating 'no alternatives' and 'reasons of overriding public interest'. The SPD is clear that payment of the RAMS tariff is one option for providing that mitigation. The alternative would be for the developer to gather their own evidence for a project level Habitats Regulations Assessment (HRA) and then to secure the necessary bespoke mitigation measures for delivery in perpetuity.</p> <p>The SPD sets out a number of options for securing the RAMS tariff. Upfront payment is not the only option.</p>	None.

			having adverse effects on development viability.	As the competent authority, the Council must ensure that mitigation is secured where likely significant effects have been identified. The cost of the RAMS tariff was taken into account when considering the 'whole plan viability' of the Local Plans.	
Jenny Sheahan	28	Objection	I have no comments on this document other than to say that I found it too obtuse and unclear what 'wildlife assets' were in real terms; one or two examples of Special Areas of Conservation in East Suffolk should have been cited at the top of the doc to make it more relevant to residents who may wish to respond.	Comments noted. This is technical document dealing with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended) and therefore does contain a certain amount of technical language. Agree to add some additional wording to the introduction section in order to further explain the impact of recreational pressure on wildlife.	Additional wording added to introduction at paragraph 3 to further explain the impact of recreational pressure on wildlife.
Lowestoft Town Council	29	Observation	The Town Council strongly feels that no housing should be permitted on protected habitat sites or in the vicinity if the development would have a negative impact on the protected site. The Town Council is keen that the current regulations are not diluted in favour of housing	Comments noted. The purpose of the RAMS strategy and SPD is to provide a strategic mitigation scheme to address the impact of increased recreational disturbance on Habitat Sites arising as the result of new residential development.	None.

			delivery numbers and wherever possible all green spaces not just protected habitats should be preserved and not developed.		
Natural England	30	Support/ Observation	<p>Natural England is pleased to offer our endorsement of the Suffolk Coast RAMS SPD.</p> <p>More detail within the introduction on the impact of recreational pressure on wildlife, including why and how it occurs, would be useful.</p> <p>Within section 2.2, a reference and/or link to the RAMS report should be included.</p> <p>We are pleased to note the detailing of the importance of Suitable Alternative Natural Green Space (SANGS) and other green infrastructure measures within section 2.4 as a means of minimising predicted increases in recreational pressure on European sites, by containing the majority of daily recreational use within or around the development site's boundary. We</p>	<p>Support noted.</p> <p>The introduction to the SPD does outline the impact of recreational pressure but agree that this could be expanded.</p> <p>Agree that a link to the Strategy should be included as part of the Introduction and at section 3.7.</p> <p>Comments noted re. development of a GI strategy. The Council are planning on developing a GI strategy for the whole of the district in due course.</p> <p>Agree to amend paragraph 22, section 3, to clarify the requirements in relation to HRA.</p> <p>Agree to amend paragraph 35, section 3.6 to clarify wording.</p>	<p>Additional wording added to introduction to further explain the impact of recreational pressure on wildlife.</p> <p>Links to RAMS strategy added to paragraph 4 and paragraph 38.</p> <p>Paragraph 22, section 3, amended to read:          "...Habitat Regulations Assessments (HRAs) <b>but undertaking an HRA</b> <del>this</del> does not negate the need to pay the RAMS tariff."</p>

		<p>have also become aware throughout the interim period that developments within built up or more densely populated areas may not always be able to provide the recommended open space measures on site, often due to site constraints. We would therefore suggest where this is the case, that planning authorities integrate the need for such avoidance measures through strategic plans where possible, such as relevant Green Infrastructure Strategies, to allow for strategic provision of GI as an avoidance mitigation measure.</p> <p>Section 3. states “Project level Habitat Regulations Assessments (HRAs) (including Appropriate Assessments) will still be required. The Suffolk Coast RAMS streamlines these Habitat Regulations Assessments (HRAs) but this does not negate the need to pay the RAMS tariff.” This final sentence may be slightly unclear, should the sentence state that “The Suffolk Coast RAMS</p>		<p>Para 35, section 3.6, amended to read: “....a development which is <b><u>assessed as having a likely significant effect</u></b> <del>likely to have an impact on the</del> integrity of a Habitat site...”</p>
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			<p>streamlines these Habitat Regulations Assessments (HRAs) but [undertaking an HRA] does not negate the need to pay the RAMS tariff”?</p> <p>Section 3.6: the sentence should read, “a development which is assessed as having a [likely significant effect] on the integrity of a European site.”</p> <p>Within section 3.7 a reference and/or link to the strategy document should ideally be included.</p>		
RSPB	31	Support/ Observation	<p>The RSPB, National Trust and Suffolk Wildlife Trust have been supportive of the development of the Recreational Disturbance Avoidance and Mitigation Strategy and we welcome the production of the Draft RAMS SPD. We have appreciated the opportunity to feed into the process of developing the scheme.</p> <p>We welcome the statements in the SPD that the RAMS applies to</p>	<p>Support noted.</p> <p>There has been engagement with the neighbouring mitigation projects throughout the development of the RAM Strategy and this will continue as implementation of the project progresses.</p> <p>We welcome the RSPB’s commitment to continued involvement in the RAMS project.</p>	None.

			<p>all residential developments where there is a net increase in dwelling numbers, that project level HRA is still required for residential developments with the potential to affect SPAs, SACs and/or Ramsar sites, that the RAMS forms one option for developers to provide mitigation and that some larger projects (or those very close to a European site) may need to provide bespoke mitigation alongside a contribution to the RAMS.</p> <p>We recognise that, for practical reasons, it has been necessary to agree a defined boundary to the geographical coverage of the RAMS.</p> <p>We suggest that the proposed Executive Group creates and maintains links with the Essex Coast RAMS and the emerging strategy in Norfolk to ensure that where possible the strategies are aligned, and cross-border issues are discussed.</p>		
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			We support the proposal to form an Executive Group to oversee the implementation of the RAMS and look forward to seeing details of the work to be carried out under the Strategy over forthcoming years. We would appreciate the opportunity for our organisations to sit on this group and feed into these discussions.		
Yvonne Smart	32	Observation	If outline permission already given, will applicant not be required to pay any additional mitigation sum?	Because the requirements of the Habitats Regulations apply to the granting of all types of permissions, developments which were granted Outline permission prior to the existence of RAMS will need to be subject to a new Habitats Regulations Assessment (HRA) on the submission of Reserved Matters applications. Therefore, in order to comply with the requirements of the Habitats Regulations, financial contributions to RAMS will be requested at Reserved Matters application stage for eligible developments which did not make a contribution at the Outline stage.	None.



Suffolk County Council	33	Observation	We have no comments to make on the draft document at this time. However, we request to be kept updated and engaged in the later developments of this document.	Noted.	None.
Walberswick Parish Council	34	Support	Welcome the processes / tariffs aimed at mitigating the impact of development and visitor numbers on natural habitats which are such an essential aspect of the ESC coast. The unprecedented numbers of visitors during the 2020 summer highlighted that the coastal communities do not have the necessary infrastructure and support to handle such numbers. This lack of infrastructure includes: an acute shortage of public toilets, insufficient police or civilian enforcement to stop anti-social behaviour and fly parking, illegal camping, and littering. The RAMS strategy should assure that processes are in place to provide appropriate financing and infrastructure to handle increased visitors and use associated both	Support noted. However, the purpose of the RAMS project and SPD is to provide a strategic mitigation scheme to address the impacts of increased recreational disturbance at Habitat Sites arising as the result of new residential development in the RAMs area. A number of the infrastructure requirements listed here will not be funded through the RAMs project. Full details of the measures that will be funded through the tariff are set out in table 6 of the strategy: <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf</a>	None.

			with new housing as well as day visitors.		
Waldringfield Parish Council	35	Objection	<p>We feel very strongly that this should not be the magic bullet which allows development in an inappropriate area. In all cases the first option should be to avoid harm rather than to introduce extraneous measures which try to mitigate the harm.</p> <p>We would also suggest that greater emphasis should be placed on securing developer contributions over a much longer period.</p> <p>We also feel strongly that mitigation measures do not address problems such as the pressures on popular recreational areas such as Waldringfield.</p> <p>The draft RAMS makes little or no reference to the Government Planning White Paper. The RAMS draft should be amended to take account of these proposed changes.</p>	<p>The mitigation measures are outlined in table 6 of the Strategy:  <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf</a></p> <p>These are a combination of those measures that avoid effects and those which mitigate for effects.</p> <p>Where appropriate, the ongoing costs of these mitigation measures are taken into account as part of the tariff calculation (up to 15 years of funding).</p> <p>The approach, as set out in the SPD, does take into account that some development, by virtue of it's proximity to a Habitat site, may require additional mitigation measures beyond the RAMS contribution. This would need to be assessed through a project level Habitats Regulations Assessment (HRA) (including Appropriate Assessment).</p>	<p>References to European legislation updated through the SPD and 'European Sites' replaced with 'Habitat Sites' in accordance with the terminology used the National Planning Policy Framework.</p>

			<p>There is little or no reference to the end of the Brexit transition period.</p>	<p>At this stage the Council is still required to the deliver against the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended). Future reviews of the Strategy and SPD will take account of any new legislative framework in place at the time.</p> <p>As confirmed by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, SAC, SPAs, and Ramsar sites continued to be protected in the same way post Brexit. However, agree that references to European legislation within the SPD should be updated.</p>	
Pigeon Investment Management	36	Objection	<p>It is recommended that greater emphasis is given to potential impacts of schemes in isolation. As phrased within the Suffolk Coast RAMS SPD, it is not necessarily clear that the tariff relates to in combination impacts and that in isolation there may be a need for project-specific</p>	<p>The wording at paragraph 19 highlights that some schemes may require additional mitigation measures in addition to payment of the tariff. It would not possible, or appropriate to define all the circumstances in which this might be necessary within the SPD.</p>	None.

			mitigation. Further clarification should be provided on this point including when a project may be required to provide mitigation for in isolation impacts.	Some guidance is included in the advice from Natural England which is set out in annex 1 of the Habitat Regulation Assessment Record template: <a href="https://eastsoffolk.gov.uk/Suffolk-Coast-RAMS-HRA-Record.pdf">Suffolk-Coast-RAMS-HRA-Record.pdf</a> ( <a href="https://eastsoffolk.gov.uk">eastsoffolk.gov.uk</a> ) Agree to add a link to this advice to paragraph 14 of the SPD.	
Pigeon Investment Management	37	Objection	Periodic review is proposed for the amount of per-dwelling tariff, but without any clarification over the review intervals or the future factors likely to influence the tariff. It is proposed that greater clarity is provided over the intervals and the information that will feed into the review process. As well as reviewing the mitigation required in relation to European sites, it is also recommended that the review process is 'future proofed' with respect to future policy changes.	As outlined in Section 10 of the Strategy, monitoring and review is essential for the successful future delivery of the RAMS project. The Strategy is clear that review will be needed once new monitoring evidence is available. Table 6 of the Strategy highlights the monitoring projects that should be prioritised for funding in the early stages of implementation. Once these have been delivered, then an assessment of review requirements can be undertaken.	None.
Pigeon Investment Management	38	Objection	The requirement for some schemes to provide Suitable Alternative Natural Green Space (SANGs) or green infrastructure measures. Some schemes should	As set out in section 3.6 of the SPD, under the Habitats Regulations, a development which is assessed as having a likely significant effect on the	Link added at paragraph 14 to HRA record and associated Natural England advice.

			<p>not need to pay the tariff where adequate mitigation is provided.</p> <p>It is not clear which schemes would require these additional mitigation measures, in terms of proximity or size of scheme. It would be useful to provide guidance here to clarify this issue at the outset. While it is appreciated that a project level HRA would need to demonstrate the likely effectiveness of mitigation if the tariff is not required to be paid, but this point could be elaborated upon in terms of the likely mitigation measures required.</p>	<p>integrity of a Habitat site, either alone or in-combination must provide mitigation or otherwise must satisfy the tests of demonstrating 'no alternatives' and 'reasons of overriding public interest'. The SPD is clear that payment of the RAMS tariff is one option for providing that mitigation. The alternative would be for the developer to gather their own evidence for a project level Habitats Regulations Assessment (HRA) and then to secure the necessary bespoke mitigation measures for delivery in perpetuity.</p> <p>The wording at paragraph 19 highlights that some schemes may require additional mitigation measures in addition to payment of the tariff. It would not possible, or appropriate to define all the circumstances in which this might be necessary within the SPD.</p> <p>Some guidance is included in the advice from Natural England</p>	
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				which is set out in annex 1 of the Habitat Regulation Assessment Record template: <a href="https://www.eastsuffolk.gov.uk/eastsuffolk.gov.uk/rams-hra-record.pdf">Suffolk-Coast-RAMS-HRA-Record.pdf</a> ( <a href="https://www.eastsuffolk.gov.uk/eastsuffolk.gov.uk">eastsuffolk.gov.uk</a> ) Agree to add a link to this advice to paragraph 14 of the SPD.	
Pigeon Investment Management	39	Objection	<p>Although the SPD summarises the aspects of the Strategy that relate to the tariff, it does not contain detail over key aspects such as the mitigation actions to be undertaken and the management of funds.</p> <p>The SPD is also based upon full cost recovery and does not take into account existing funding streams. This is questionable in the context of the tests set out under Regulation 122 of the Community Infrastructure Regulations 2010 (as amended). Consideration should therefore be given to existing funding streams.</p>	<p>The mitigation measures and other proposals connected to the implementation of the RAMS project are set out in the Strategy:  <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf</a></p> <p>The focus of the SPD is to support the collection of the tariff through the development management process. It is not considered necessary, or appropriate to repeat all aspects of the strategy in the SPD.</p> <p>The strategy does make reference to potential other sources of funding (e.g New Burdens funding). It is not considered necessary, or appropriate to</p>	None.

				repeat this level of detail in the SPD.	
Pigeon Investment Management	40	Objection	<p>The source of funding for the River Deben is unclear.</p> <p>This Suffolk Coast RAMS SPD relates only to Zone A and should be focussed towards mitigation along the Stour and Orwell Estuaries SPA/Ramsar and possibly the Deben SPA/Ramsar only.</p> <p>There is no commentary or guarantee that funds will be ringfenced in relation to the sites for which their respective schemes would impact. Greater assurance is requested over the point that “development in any location is only contributing to mitigation relevant to that location”.</p>	<p>As shown on the map in Appendix 2 of the SPD, the Deben sites fall within tariff Zone B. However, the wording in the SPD reflects the fact that zone of influence specific to the Deben does extend into Zone A. Further detail on how the Zones of Influence have been established is set out in section 6 of the Strategy.</p> <p>The East Suffolk Council area is covered by both Zone A and Zone B and therefore the SPD covers mitigation requirements across both tariff zones.</p> <p>As outlined in section 6 of the Strategy, it is necessary to define a simple, pragmatic and useable approach to the tariff zones, whereby development in any location is only contributing to mitigation relevant to that location. Within the overall zone it is therefore necessary to draw divisions to reflect the relevance to different sites. For example,</p>	None.

				there is no link between development in the far south, near the Orwell and impacts to Little Terns at Benacre or Kessingland.	
Pigeon Investment Management	41	Objection	It is suggested that the payment of the tariff is more strongly linked to the occupation date of homes, with payments linked to the phasing of larger schemes.	The SPD sets out a number of options for securing the RAMS tariff. Upfront payment is not the only option.	None.
Pigeon Investment Management	42	Objection	<p>Within the Strategy the number and quantum of measures to be implemented are not explained or justified in quantitative terms, e.g. the overall website costs and the numbers of automated car counters.</p> <p>It is not clear how these measures relate to new homes and whether there is overlap with the activities and duties of other organisations.</p>	<p>The tariff set out in the SPD is taken from the RAMS Strategy where the approach is fully evidence. The tariff is based on a comprehensive assessment of housing delivery, the impacts of that development and the cost of mitigation measures. The measures are set out and costed in table 6 of the Strategy: <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf</a> It is not considered necessary to repeat this level of detail in the SPD.</p> <p>Section 8 of the strategy, details the role of the RAMS Delivery Officer which includes identifying</p>	None.



				‘opportunities that will enhance the success of the Strategy, such as adding to existing initiatives or identifying local delivery bodies for particular projects.’ The strategy includes provision for biannual stakeholder group meetings to facilitate this.	
Pigeon Investment Management	43	Objection	The RAMS tariff should not apply to reserved matters applications.	Regulation 63 of the Conservation of Habitats and Species Regulations (2017) (as amended) requires that the council, as a competent authority, must undertake an Appropriate Assessment before giving any consent, permission or other authorisation for a plan or project which is likely to have a significant effect on a Habitat site. This requirement applies to all types of planning application, including those for Reserved Matters and Variation of Condition. Because the requirements of the Habitats Regulations apply to the granting of all types of permissions, developments which were granted Outline permission prior to the existence of RAMS will	None.

				need to be subject to a new Habitats Regulations Assessment (HRA) on the submission of Reserved Matters applications. Therefore, in order to comply with the requirements of the Habitats Regulations, financial contributions to RAMS will be requested at Reserved Matters application stage for eligible developments which did not make a contribution at the Outline stage.	
Historic England	48	Observation	We regret that we are unable to comment specifically at this time as a result of the number of consultations we are currently receiving. Although we have not been able to provide a substantive response at this stage, this does not mean that we are not interested in further iterations of the document. Please note that we may still advise on, and potentially object to, any specific development proposal(s) which may subsequently arise from this or later versions of the	Noted.	None.

			documents subject to the consultation.		
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# Habitats Regulations Assessment of the Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document

April 2021

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## 1. Introduction

1.1 The European Habitats Directive<sup>1</sup> and Wild Birds Directive<sup>2</sup> provide protection for sites that are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species. The network consists of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Both types can also be referred to as European Sites. The National Planning Policy Framework (NPPF) also states that Ramsar sites should be afforded the same level of protection as the European sites.

1.2 The requirement to undertake Habitats Regulation Assessment (HRA) of plans and projects is set out in the Conservation of Habitats and Species Regulations (2017) (as amended).

1.3 Regulation 105 of the Conservation of Habitats and Species Regulations (2017) states:

‘Where a land use plan:

(a) Is likely to have a significant effect on a European sites 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, The plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site’s conservation objectives.’

1.4 The HRA is therefore undertaken in stages and should conclude whether or not a proposal or policy would adversely affect the integrity of any sites.

Stage 1: Determining whether a plan is likely to have a significant effect on a European site. This needs to take account of the likely impacts in combination with other relevant plans and projects. This assessment should be made using the precautionary principle. The screening assessment must reflect the outcomes of the 2018 judgement of the Court of Justice of the European

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<sup>1</sup> 92/43/EEC

<sup>2</sup> 2009/147/EEC

Union<sup>3</sup>, which has ruled that where mitigation is necessary this must be identified through an Appropriate Assessment.

Stage 2: Carrying out Appropriate Assessment and ascertaining the effect on site integrity. The effects of the plan on the conservation objectives of sites should be assessed, to ascertain whether the plan has an adverse effect on the integrity of a European site.

Stage 3: Identifying mitigation measures and alternative solutions. The aim of this stage is to find ways of avoiding or significantly reducing adverse impacts, so that site integrity is no longer at risk. If there are still likely to be negative impacts, the option should be dropped, unless exceptionally it can be justified by imperative reasons of overriding public interest.

- 1.5 The Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (RAMS SPD) has been produced by East Suffolk Council. The SPD will apply to the whole of the East Suffolk Council area, although the related RAMS tariff will only apply in the identified RAMS zone. This report considers whether there are likely to be significant effects on protected European sites and where a full Appropriate Assessment may be required.
- 1.6 East Suffolk Council is covered by two Local Plans, the East Suffolk Council - Suffolk Coastal Local Plan adopted September 2020 and the Waveney Local Plan adopted March 2019. Part of East Suffolk lies within the Broads, and within this area spatial planning and development management is the responsibility of the Broads Authority.
- 1.7 Both Local Plans were subject to Habitats Regulations Assessment as part of their production. Where screening identified a likely significant effect, Appropriate Assessment was undertaken and the mitigation measures identified were incorporated within the Plans, resulting in conclusions that the plans will not lead to any adverse effects on European wildlife sites within and in the vicinity of the (then) Suffolk Coastal and Waveney Districts. Both

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<sup>3</sup> C-323/17 – People over Wind, Peter Sweetman v Coillte Teoranta

Appropriate Assessments identified recreational disturbance particularly from dog walkers as a significant effect. The Council has subsequently produced a Recreational Avoidance and Mitigation Strategy (which this SPD supports) and requires payment towards mitigation from residential developments within 13km of the protected European sites.

## 2. Protected sites covered by this report

- 2.1 Sites included in this assessment are listed in Table 1. This includes all sites that are within 20km of East Suffolk Council. The locations of the sites are shown on maps in Appendix 2 and the Qualifying Features and Conservation Objectives of the sites are contained in Appendix 3, along with a summary of the pressures and threats as documented in the Appropriate Assessments for the Local Plans.

**Table 1: Relevant European protected sites**

Name
Alde-Ore and Butley Estuaries SAC,
Alde-Ore Estuary SPA, Ramsar
Benacre to Easton Bavents SPA
Benacre to Easton Bavents Lagoons SAC
Breydon Water SPA, Ramsar
Broadland SPA, Ramsar
Deben Estuary SPA, Ramsar
Dew's Ponds SAC
Great Yarmouth North Denes SPA
Haisborough, Hammond and Winterton SAC
Minsmere to Walberswick Heaths & Marshes SAC
Minsmere – Walberswick SPA, Ramsar
Norfolk Valley Fens SAC
Outer Thames Estuary SPA
Orfordness – Shingle Street SAC
Sandlings SPA
Southern North Sea SAC
Staverton Park and The Thicks, Wantisden SAC
Stour and Orwell Estuaries SPA, Ramsar
The Broads SAC



Winterton-Horsey Dunes SAC
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### 3. Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (RAMS SPD)

- 3.1 This HRA report reviews the Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (RAMS SPD).
- 3.2 Appropriate Assessments carried out for the Local Plans identified a likely significant effect from increased recreational pressure on Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar Sites arising from the delivery of new housing. To address this, East Suffolk Council, Ipswich Borough Council, Mid Suffolk District Council and Babergh District Council produced a Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). This strategy set out a tariff based approach to mitigating the impact of recreational disturbance on European Sites resulting from increased housing development across the Local Authority areas. Delivery of the RAM strategy fulfils a key requirement of the Appropriate Assessments of the Suffolk Coastal and Waveney Local Plans.
- 3.3 The Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document, supports the delivery of the mitigation measures set out in the Suffolk Coast RAMS and provides a framework for implementing those provisions. The Supplementary Planning Document also includes information for developers and applicants to assist them in meeting the other requirements under the Conservation of Habitats and Species Regulations (2017) (as amended) (the Habitats Regulations). The Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document builds on the approach set out in Suffolk Coastal Local Plan policies SCLP2.3: Cross-boundary mitigation of effects on Protected Habitats and SCLP10.1 (Biodiversity and Geodiversity) and Waveney Local Plan policy WLP8.34 (Biodiversity and Geodiversity). Both local plans were subject to Sustainability Appraisal including Strategic Environmental Assessment throughout their development.

- 3.4 Chapter 1 (sections 1.1 and 1.2) of the SPD provides the background to the Suffolk Coast RAMS and sets out the purpose of the SPD. This section is descriptive and has therefore not been included in the screening table in section 5 of this report.
- 3.5 Section 2.1 of the SPD covers the policy background, and explains the development of the Suffolk Coast RAMS which the SPD supports. Section 2.2 of the SPD is also descriptive, and clarifies which European Sites the Suffolk Coast RAMS applies to. The SPD explains that twelve European Sites formed the focus of the Suffolk Coast RAMS report. Section 2.3 of the SPD explains the zone of influence where the RAMS tariff will be collected. The list of relevant sites and the zone of influence were both established through the Suffolk Coast RAMS (informed by the relevant Local Plan Appropriate Assessments) and neither were reviewed or changed through the SPD process. As these sections merely describe what is already set out in the Suffolk Coast RAMS, they have not been included in the screening table in section 5 of this report.
- 3.6 Section 2.4 of the SPD sets out the per dwelling tariff that is payable within the zone of influence. This is taken from the Suffolk Coast RAMS and is included here for ease of reference. This section also covers what additional measures (in addition to the RAMS tariff) might be required in certain circumstances. This additional guidance goes beyond what is included in the Suffolk Coast RAMS and has therefore been included in the screening table in section 5 of this report.
- 3.7 Chapter 3 of the SPD provides guidance for those the making a planning application with the zone of influence. Section 3.1 sets out the types of development that RAMS will be applied to. The Suffolk Coast RAMS established that the tariff should apply to all new residential developments where there is a net increase in dwelling numbers. The SPD provides further guidance on the exact types of residential development that the tariff will apply to. Similarly, section 3.2 clarifies the types of planning applications that the RAMS tariff will apply to. Section 3.3 sets out the mechanisms that the council has put in place to collect RAMS contributions, and explains the relationship between the tariff and any other contributions that may be payable. The additional guidance in these sections goes beyond what is included in the Suffolk Coast RAMS and has therefore been included in the screening table in section 5 of this report.

- 3.8 Sections 3.4 and 3.5 of the SPD deal with detailed technical matters relating the payment of fees and the refusal of planning permission. This additional guidance goes beyond what is included in the Suffolk Coast RAMS and has therefore been included in the screening table in section 5 of this report.
- 3.9 Section 3.6 of the SPD briefly summarises the requirements within the Habitats Regulations to ensure that impacts of development are adequately mitigated. This section sets out the Council's approach to the consideration of alternative mitigation measures. This additional guidance goes beyond what is included in the Suffolk Coast RAMS and has therefore been included in the screening table in section 5 of this report.
- 3.10 Section 3.7 of the SPD cross-references the strategy and summarises the approach to the spending of collected RAMS contributions. Although mostly descriptive this does highlight a key aspect of the RAMS project (implementing the mitigation) and has therefore been included in the screening table in section 5 of this report.

## 4. Other Plans and Projects

- 4.1 Regulation 105 of the Habitats Regulations requires consideration to be given to whether a Plan will have an effect either alone or in combination with other plans or projects.
- 4.2 As noted in the introduction, the other key plans are the Local Plans. The Local Plans set out the broad scale and distribution of development across the area of East Suffolk formerly covered by Suffolk Coastal District and Waveney District. Part of East Suffolk lies within the Broads, and within this area spatial planning and development management is the responsibility of the Broads Authority. A separate HRA process has been undertaken for the Broads Local Plan (adopted 2019).
- 4.5 The Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (RAMS SPD) adds detail to Suffolk Coastal Local Plan policies SCLP2.3: Cross-boundary mitigation of effects on Protected Habitats and SCLP10.1 (Biodiversity and Geodiversity) and Waveney Local Plan policy WLP8.34 (Biodiversity and Geodiversity) and provides further guidance on the implementation of those policies.

- 4.6 A screening process considered each policy in the Suffolk Coastal and Waveney Local Plans and concluded whether significant effects were likely and if Appropriate Assessment was therefore needed. The Appropriate Assessments of the Suffolk Coastal and Waveney Local Plans considered the following themes:
- Recreation pressure,
  - Air quality and traffic emissions,
  - Biodiversity net gain,
  - Urbanisation,
  - Water quality, resources and treatment, and
  - Flood risk and coastal erosion.
- 4.7 Mitigation measures were identified within the Appropriate Assessments and incorporated within both Local Plans, resulting in a conclusion that neither plan would lead to any adverse effects on European wildlife sites within and in the vicinity of the (then) Suffolk Coastal and Waveney Districts. Delivery of the Suffolk Coast RAMS (supported by this SPD) fulfils a key requirement of the Appropriate Assessments of the Suffolk Coastal and Waveney Local Plans.

## 5. Assessment of likely significant effects of the Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (RAMS SPD) on European protected sites

- 5.1 Table 3 below considers each relevant section of the Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (RAMS SPD) in relation to whether there is potential for a likely significant effect on protected European sites. This constitutes Stage 1 as set out under paragraph 1.4 above. Consideration is given to the characteristics and location of the protected sites. The relevant sections are considered within the context of the Local Plan policies from which they hang and which have themselves been subject to Habitats Regulations Assessment, as set out in section 4 above.

**Table 3: Likely significant effects of the Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document**

<b>Section</b>	<b>Assessment of potential impact on Natura 2000 sites</b>	<b>Natura 2000 sites that could possibly be affected</b>	<b>Likely significant effect identified</b>	<b>AA needed?</b>
2.4 The Tariff	Sets out the per dwelling tariff that is payable within the zone of influence. This is taken from the Suffolk Coast RAMS and is included here for ease of reference. The section also covers what additional measures (in addition to the RAMS tariff) might be required in certain circumstances, including the provision of SANG. The RAMS tariff payments and any additional measures will be used to ensure the mitigation of impacts and will therefore not give rise to any likely significant effects.	None	None	No
3.1 What types of development does this apply to?	Sets out the types of development that RAMS will be applied to. RAMS tariff payments will be used to deliver mitigation measures and this section of the SPD ensures that all relevant types of development that could lead to recreational disturbance impacts contribute to those mitigation measures.	None	None	No
3.2 What types of application does this apply to?	Sets out the types of applications that RAMS will be applied to. RAMS tariff payments will be used to deliver mitigation measures and this section of the SPD	None	None	No

Section	Assessment of potential impact on Natura 2000 sites	Natura 2000 sites that could possibly be affected	Likely significant effect identified	AA needed?
	ensures that all relevant types of development that could lead to recreational impacts contribute to those mitigation measures.			
3.3 When and how do I pay the contribution?	Sets out the mechanisms that the council has put in place to collect the RAMS contributions and explains the relationship between the tariff and any other contributions that may be payable. The guidance in this section ensures that contributions are collected in a timely and appropriate manner, ensuring that mitigation measures can be funded.	None	None	No
3.4 Legal / Admin fees	Sets out detailed technical matters relating the payment of fees. This section clarifies the process for applicants but doesn't directly relate to delivery of development.	None	None	No
3.5 What if I don't get planning permission or choose not to implement my planning permission?	Sets out detailed technical matters relating to the refusal of planning permission and the refund process. This section clarifies the process for applicants but doesn't directly relate to delivery of development.	None	None	No
3.6 Do I have to pay the Suffolk Coast RAMS tariff?	Briefly summarises the requirements within the Habitats Regulations to ensure that impacts of development are adequately mitigated. This section sets	None	None	No

Section	Assessment of potential impact on Natura 2000 sites	Natura 2000 sites that could possibly be affected	Likely significant effect identified	AA needed?
	out the Council's approach to the consideration of alternative measures, ensuring that effects are appropriately mitigated.			
3.7 How will the tariff be spent?	Cross-references the strategy and briefly summarises the approach to the spending of RAMS contributions. Although mostly descriptive, this does highlight a key aspect of the RAMS project (implementing the mitigation).	None	None	No



## 7. Summary and conclusions

- 7.1 The Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (RAMS SPD) provides additional guidance to inform the determination of planning applications alongside the Waveney and Suffolk Coastal Local Plans. The SPD provides further guidance on the implementation of the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy, to help ensure the impacts of new residential development are adequately mitigated.
- 7.2 Delivery of the Suffolk Coast RAMS (supported by this SPD) fulfils a key requirement of the Appropriate Assessments of the Suffolk Coastal and Waveney Local Plans. Implementation of the SPD will not lead to likely significant effects on protected European sites.
- 7.3 The draft Screening Statement was published for consultation alongside the draft Supplementary Planning Document. Natural England, as the appropriate nature conservation body, were consulted on the draft Screening Statement and confirmed that they agree with the conclusions.

Signed: 

Dated: 15<sup>th</sup> April 2021

Desi Reed  
Planning Policy and Delivery Manager  
East Suffolk Council

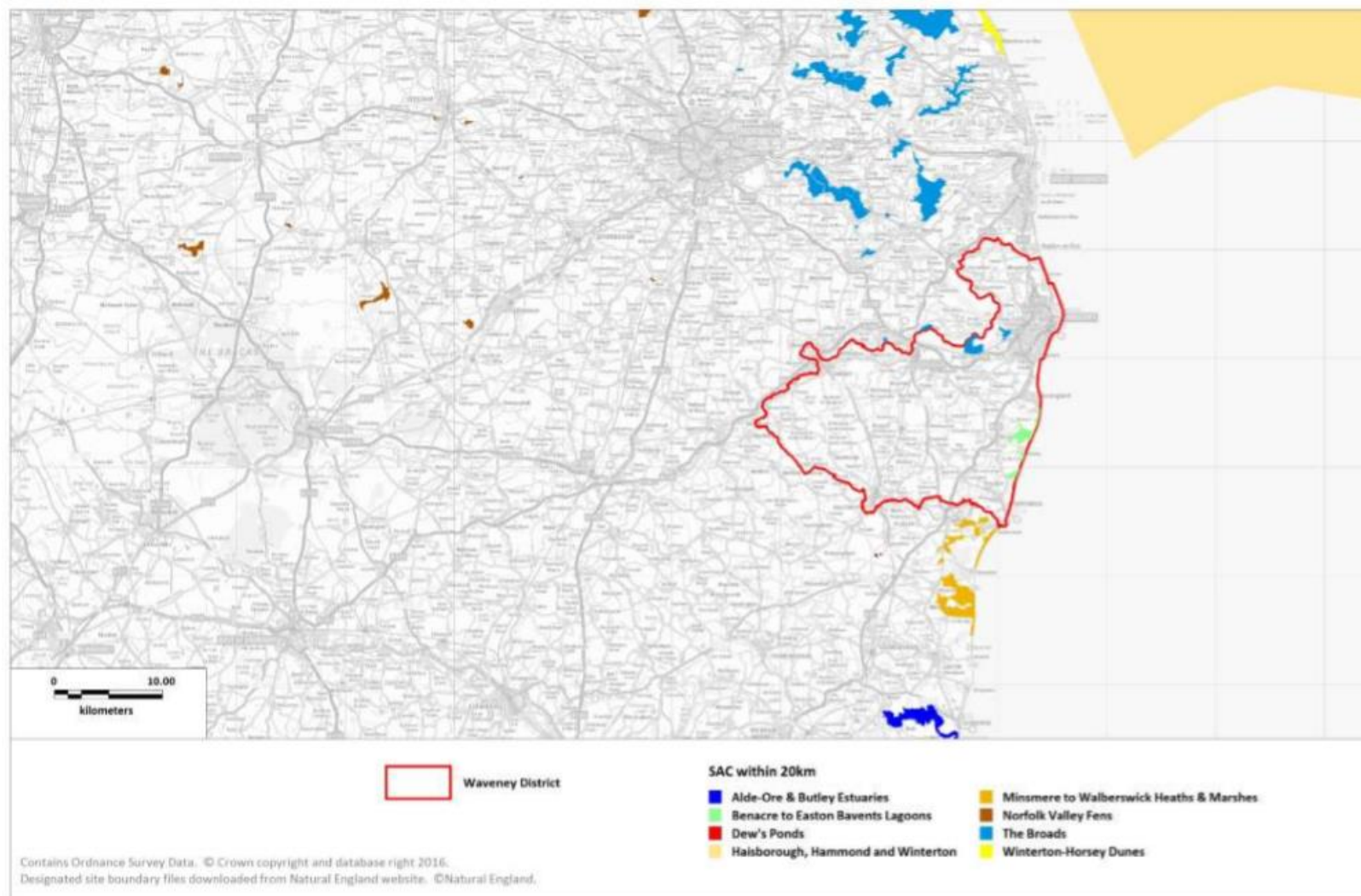
## Appendix 1: Sources of background information

- Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils (May 2019)
- Habitats Regulations Assessment for the Suffolk Coastal Local Plan at Final Draft Plan stage (incorporating Main Modifications) (May 2020)
- The Habitats Regulations Assessment of the Waveney Local Plan (December 2018)

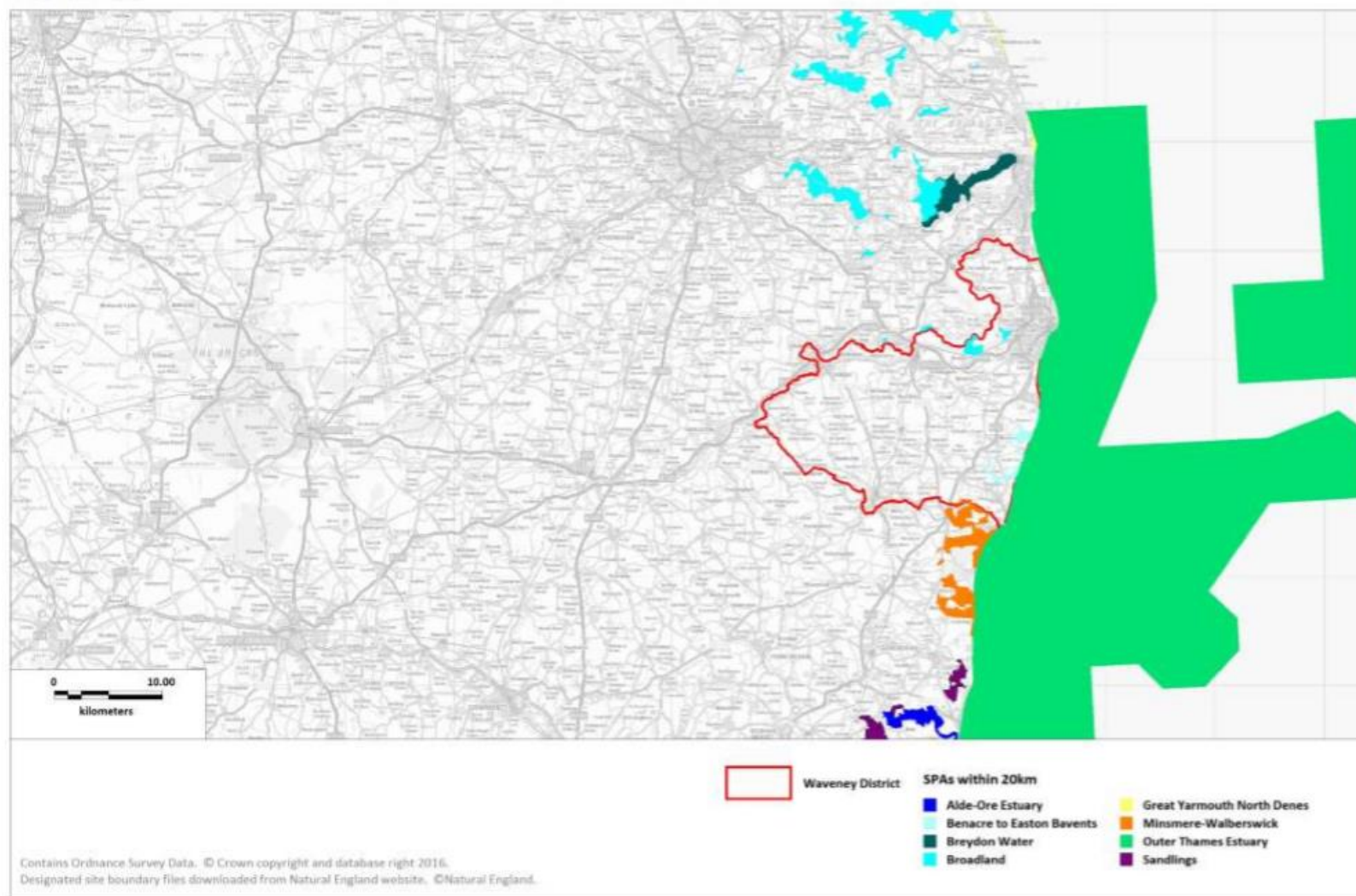
## Appendix 2: Locations of European protected sites

European protected sites within 20km of the East  
Suffolk Council- Waveney Local Plan Area

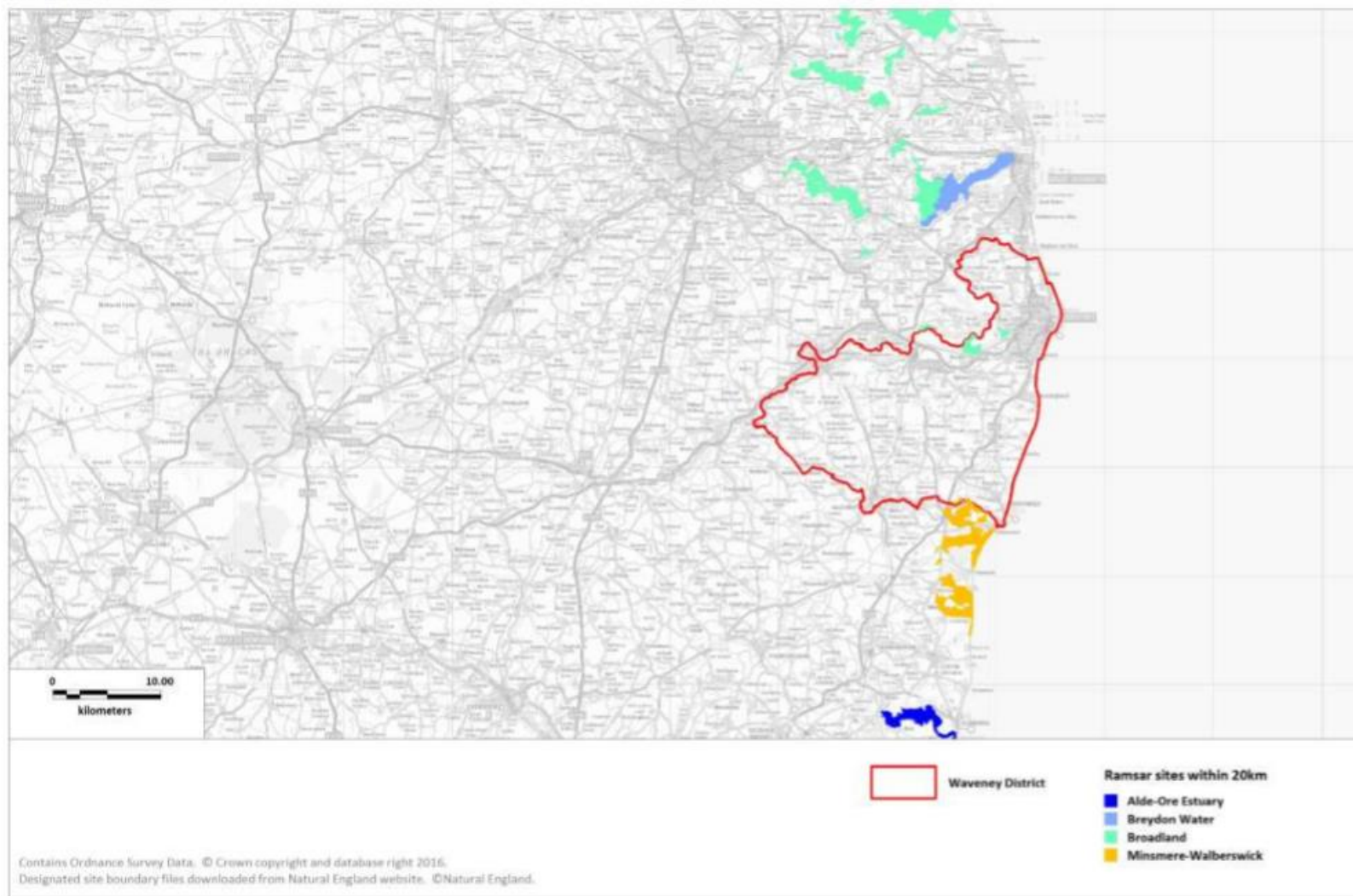
Map 1: SACs



Map 2: SPAs



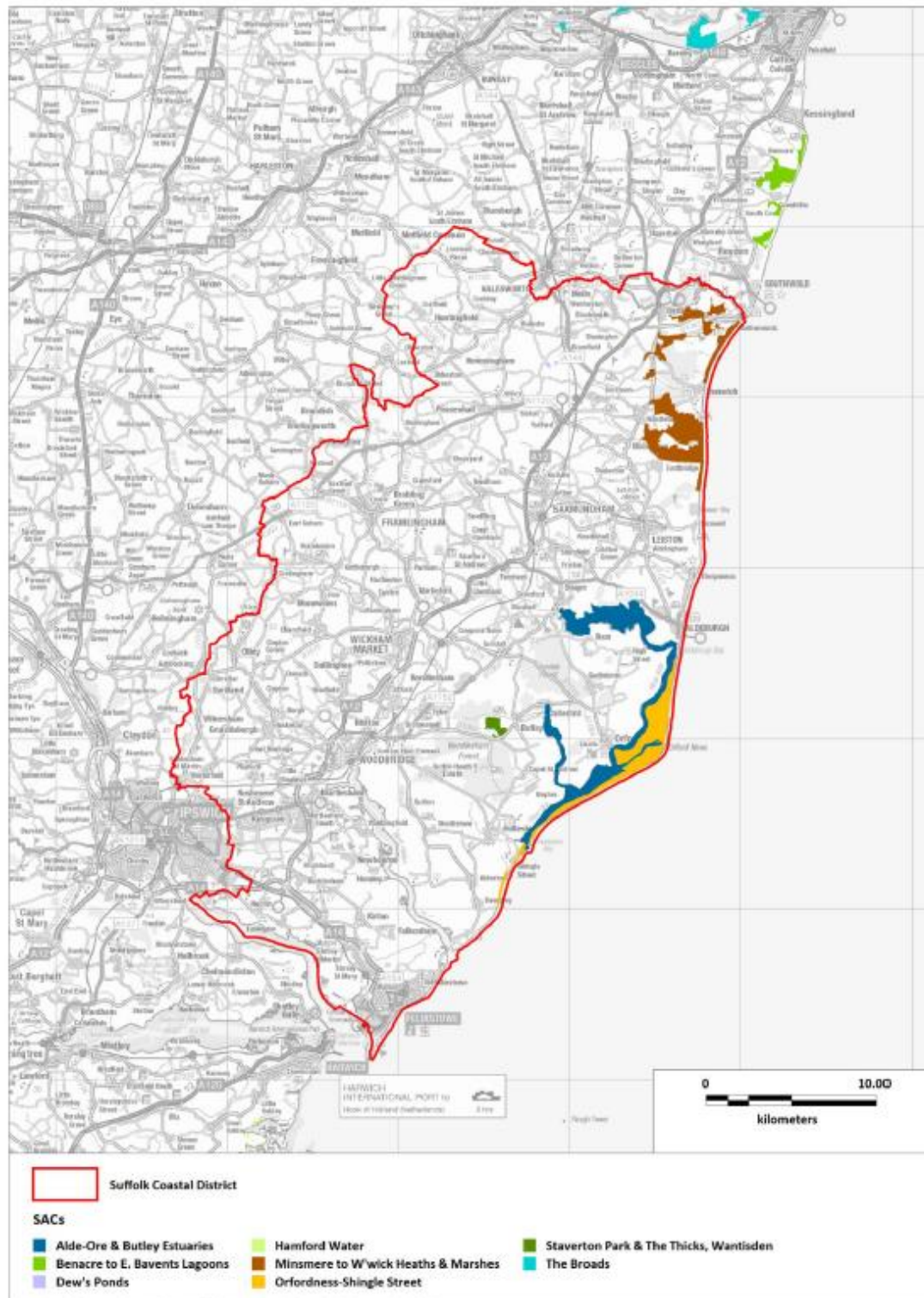
**Map 3: Ramsar Sites**



## European protected sites within 20km of the East Suffolk Council- Suffolk Coastal Local Plan Area

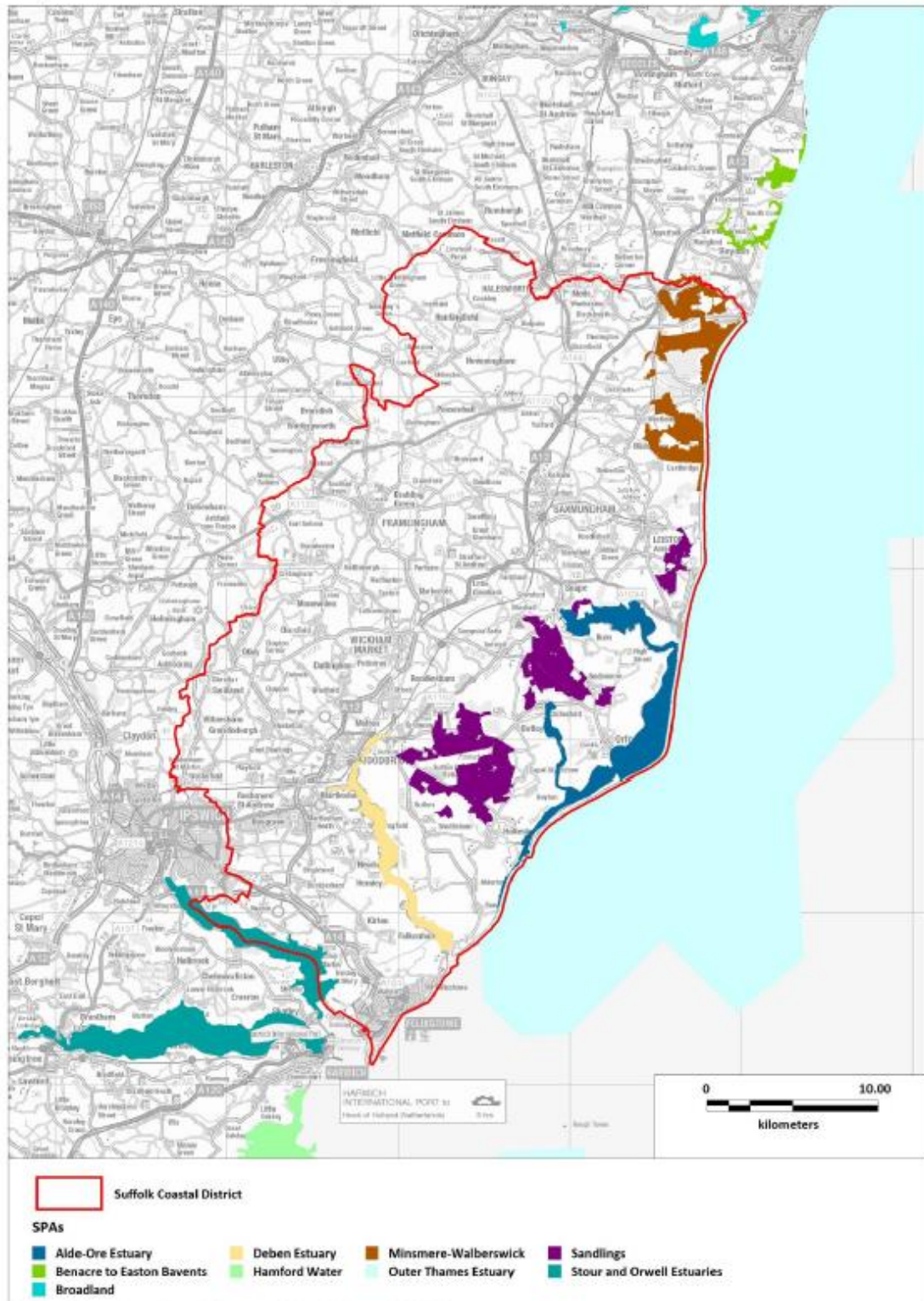


Map 1: SAC sites where boundary within 20km of Suffolk Coastal District



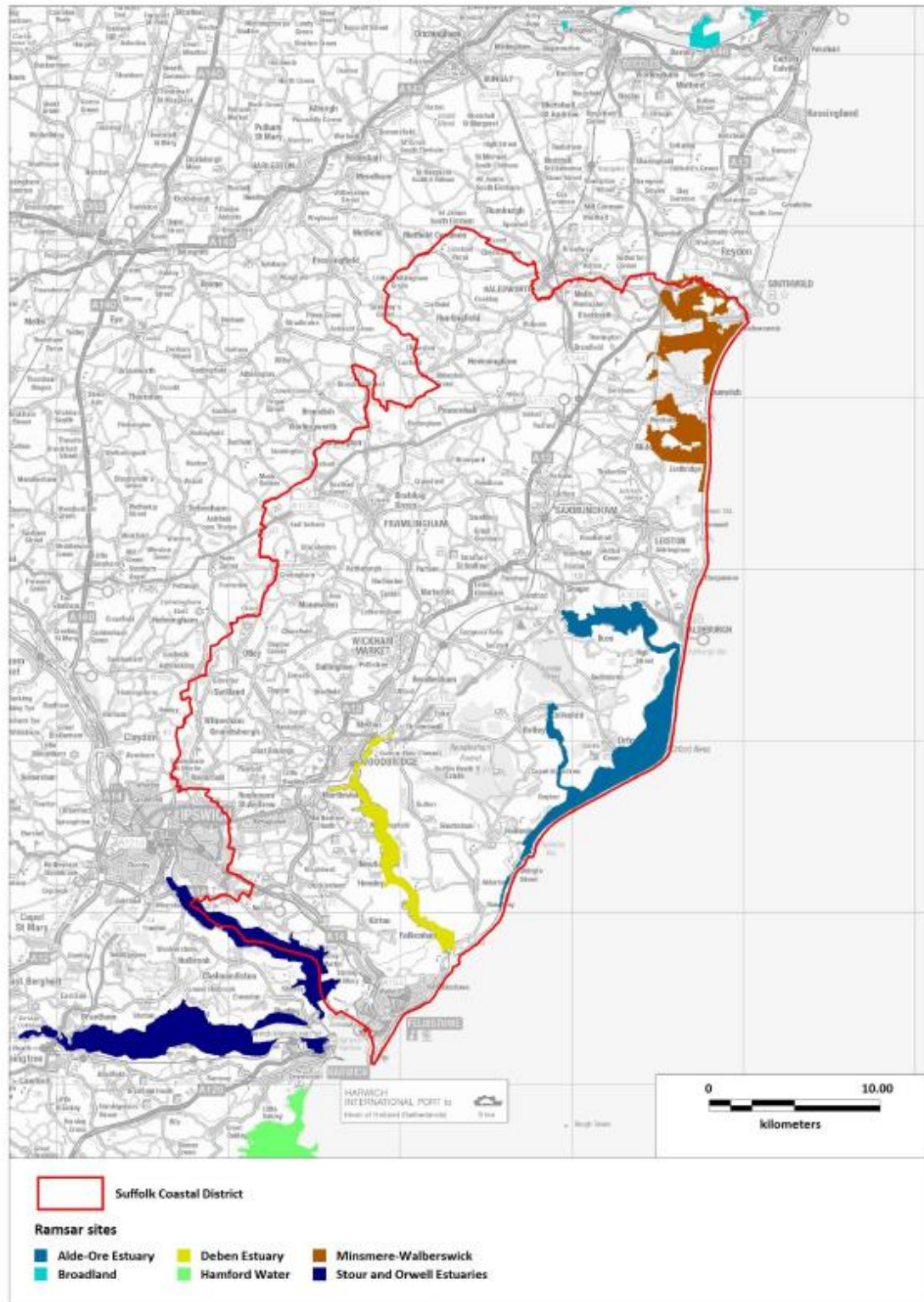


**Map 2: SPA sites where boundary within 20km of Suffolk Coastal District**



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**Map 3: Ramsar sites where boundary within 20km of Suffolk Coastal District**



## Appendix 3: Relevant European protected sites

Name	Qualifying features	Conservation Objectives	Pressure and threats (as summarised in the Habitats Regulations Assessment for the Suffolk Coastal Local Plan at Final Draft Plan Stage (December 2018))
<b>Special Areas of Conservation</b>			
Alde-Ore and Butley Estuaries	H1130: Estuaries H1140: Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats H1330: Atlantic salt meadows	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; The structure and function (including typical species) of qualifying natural habitats; The supporting processes on which qualifying natural habitats rely.	Hydrological changes, public access/disturbance, inappropriate coastal management, coastal squeeze, inappropriate pest control, changes in species distributions, invasive species, air pollution, fisheries (commercial marine and estuarine) (Alde-Ore and Butley Estuaries SAC and Alde-Ore SPA)
Benacre to Easton Barents Lagoons	H1150# Coastal lagoons, A195(B) <i>Sterna albifrons</i> : Little tern A021(B) <i>Botaurus stellaris</i> : Great bittern A081(B) <i>Circus aeruginosus</i> : Eurasian marsh harrier	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,	Public access/disturbance, water pollution, physical modification, changes in species distributions, fisheries (marine and estuarine).

		The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.	
Dew's Ponds	S1166 Triturus cristatus: Great crested newt	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 habitats of qualifying species, The structure and function of the habitats of qualifying species, The supporting processes on which the habitats of qualifying species rely, The populations of qualifying species, and, The distribution of qualifying species within the site.	None identified
Minsmere to Walberswick Heaths and Marshes	H4030 European dry heaths H1210 Annual vegetation of drift lines H1220 Perennial vegetation of stony banks A052(B) Anas crecca: Eurasian teal A021(B) Botaurus stellaris: Great bittern A081(B) Circus aeruginosus: Eurasian marsh harrier	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,	Coastal squeeze, public access/disturbance, changes in species distributions, invasive species, inappropriate pest control, air pollution, water pollution, deer, fisheries (commercial marine and estuarine)

	<p>A082(NB) Circus cyaneus: Hen harrier</p> <p>A224(B) Caprimulgus europaeus: European nightjar</p> <p>A056(B) Anas clypeata: Northern shoveler</p> <p>A056(NB) Anas clypeata: Northern shoveler</p> <p>A051(B) Anas strepera: Gadwall</p> <p>A051(NB) Anas strepera: Gadwall</p> <p>A132(B) Recurvirostra avosetta: Pied avocet</p> <p>A195(B) Sterna albifrons: Little tern</p> <p>A394(NB) Anser albifrons albifrons: Greater white-fronted goose</p>	<p>The structure and function (including typical species) of qualifying natural habitats, and,</p> <p>The supporting processes on which qualifying natural habitats rely.</p>	
Orfordness – Shingle Street	<p>H1150: Coastal Lagoons</p> <p>H1210: Annual vegetation of drift lines</p> <p>H1220: Perennial vegetation of stony banks; Coastal shingle vegetation outside the reach of waves</p>	<p>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:</p> <p>The extent and distribution of qualifying natural habitats;</p> <p>The structure and function (including typical species) of qualifying natural habitats; and</p> <p>The supporting processes on which qualifying natural habitats rely.</p>	Not identified in Suffolk Coastal Final Draft Local Plan HRA.

Staverton Park and The Thicks, Wantisden	H9190: Old acidophilous oak woods with <i>Quercus robur</i> on sandy plains; Dry oak-dominated woodland.	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; The structure and function (including typical species) of qualifying natural habitats; and The supporting processes on which qualifying natural habitats rely.	Woodland management, disease, atmospheric pollution.
The Broads	H7210# Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> S1016 <i>Vertigo moulinsiana</i> : Desmoulin's whorl snail H7230 Alkaline fens H6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils ( <i>Molinion caeruleae</i> ) H91E0# Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> ( <i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i> ) H7140 Transition mires and quaking bogs	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,	Water pollution, climate change, invasive species, siltation, inappropriate water levels, hydrological changes, water abstraction, change in land management, inappropriate ditch management, inappropriate scrub control, changes in species distributions, public access/disturbance, undergrazing, drainage, direct impact from 3rd party

	<p>H3140 Hard oligo-mesotrophic waters with benthic vegetation of Chara spp</p> <p>H3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation</p> <p>S1355 Lutra lutra: Otter</p> <p>S1903 Liparis loeselii: Fen orchid</p> <p>S4056 Anisus vorticulus: Little ramshorn whirlpool snail</p>	The populations of qualifying species, and, The distribution of qualifying species within the site.	
<b>Special Protection Areas</b>			
Alde-Ore Estuary (also Ramsar site)	<p>A081: Eurasian marsh harrier (breeding)</p> <p>A132: Pied avocet (non-breeding)</p> <p>A132: Pied avocet (breeding)</p> <p>A151: Ruff (non-breeding)</p> <p>A162: Common redshank (non-breeding)</p> <p>A183: Lesser black-backed gull (breeding)</p> <p>A191: Sandwich tern (breeding)</p> <p>A195: Little tern (breeding)</p>	<p>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:</p> <p>The extent and distribution of the habitats of the qualifying features;</p> <p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>	<p>Hydrological changes, public access/disturbance, inappropriate coastal management, coastal squeeze, inappropriate pest control, changes in species distributions, invasive species, air pollution, fisheries (commercial marine and estuarine)</p> <p>(Alde-Ore and Butley Estuaries SAC and Alde-Ore SPA)</p>
Benacre to Easton Bvents	<p>H1150# Coastal lagoons,</p> <p>A195(B) Sterna albifrons: Little tern</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to</p>	<p>Public access/disturbance, water pollution, physical modification, changes</p>

	<p>A021(B) <i>Botaurus stellaris</i>: Great bittern</p> <p>A081(B) <i>Circus aeruginosus</i>: Eurasian marsh harrier</p>	<p>achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p> <p>The extent and distribution of the habitats of the qualifying features,</p> <p>The structure and function of the habitats of the qualifying features,</p> <p>The supporting processes on which the habitats of the qualifying features rely,</p> <p>The population of each of the qualifying features, and,</p> <p>The distribution of the qualifying features within the site.</p>	<p>in species distributions, fisheries (marine and estuarine).</p>
Broadlands (also Ramsar site)	<p>H7210# Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i></p> <p>S1016 <i>Vertigo moulinsiana</i>: Desmoulin's whorl snail</p> <p>H7230 Alkaline fens</p> <p>H6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>)</p> <p>H91E0# Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, <i>Alnion incanae</i>, <i>Salicion albae</i>)</p> <p>H7140 Transition mires and quaking bogs</p> <p>H3140 Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara</i> spp</p>	<p>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;</p> <p>The extent and distribution of qualifying natural habitats and habitats of qualifying species,</p> <p>The structure and function (including typical species) of qualifying natural habitats,</p> <p>The structure and function of the habitats of qualifying species,</p> <p>The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely,</p> <p>The populations of qualifying species, and,</p>	<p>Water pollution, climate change, invasive species, siltation, inappropriate water levels, hydrological changes, water abstraction, change in land management, inappropriate ditch management, inappropriate scrub control, changes in species distributions, public access/disturbance, undergrazing, drainage, direct impact from 3rd party</p>



	H3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation S1355 Lutra lutra: Otter S1903 Liparis loeselii: Fen orchid S4056 Anisus vorticulus: Little ramshorn whirlpool snail	The distribution of qualifying species within the site.	
Deben Estuary (also Ramsar site)	A046a: Dark bellied brent goose (non-breeding) A132: Pied avocet (non-breeding)	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.	Coastal squeeze, disturbance to birds, water and air pollution.
Outer Thames Estuary	A001: Red-throated Diver (Non-breeding) A195: Common Tern (Breeding) A193: Little Tern (Breeding)	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;	Not identified in Suffolk Coastal Final Draft Local Plan HRA. SIP identifies fisheries.

		<p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>	
Minsmere to Walberswick (also Ramsar site)	<p>H4030 European dry heaths</p> <p>H1210 Annual vegetation of drift lines</p> <p>H1220 Perennial vegetation of stony banks</p> <p>A052(B) <i>Anas crecca</i>: Eurasian teal</p> <p>A021(B) <i>Botaurus stellaris</i>: Great bittern</p> <p>A081(B) <i>Circus aeruginosus</i>: Eurasian marsh harrier</p> <p>A082(NB) <i>Circus cyaneus</i>: Hen harrier</p> <p>A224(B) <i>Caprimulgus europaeus</i>: European nightjar</p> <p>A056(B) <i>Anas clypeata</i>: Northern shoveler</p> <p>A056(NB) <i>Anas clypeata</i>: Northern shoveler</p> <p>A051(B) <i>Anas strepera</i>: Gadwall</p> <p>A051(NB) <i>Anas strepera</i>: Gadwall</p>	<p>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;</p> <p>The extent and distribution of the habitats of the qualifying features,</p> <p>The structure and function of the habitats of the qualifying features,</p> <p>The supporting processes on which the habitats of the qualifying features rely,</p> <p>The population of each of the qualifying features, and,</p> <p>The distribution of the qualifying features within the site.</p>	<p>Coastal squeeze, public access/disturbance, changes in species distributions, invasive species, inappropriate pest control, air pollution, water pollution, deer, fisheries (commercial marine and estuarine)</p>

	A132(B) <i>Recurvirostra avosetta</i> : Pied avocet A195(B) <i>Sterna albifrons</i> : Little tern A394(NB) <i>Anser albifrons</i> : Greater white-fronted goose		
Outer Thames Estuary	A001 (W) <i>Gavia stellata</i> Red-throated Diver A195 (B) <i>Sterna hirundo</i> Common Tern A193 (B) <i>Sternula albifrons</i> Little Tern	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.	Not identified in Suffolk Coastal Final Draft Local Plan HRA. SIP identifies fisheries.
Sandlings	A224: European nightjar (breeding) A246: Woodlark (breeding)	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;	Changes in species distributions, inappropriate scrub control, deer, air pollution, public access/disturbance.

		<p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>	
Stour and Orwell Estuaries (also Ramsar site)	<p>A046a: Dark bellied brent goose (non-breeding)</p> <p>A054: Northern pintail (non-breeding)</p> <p>A132: Pied avocet (non-breeding)</p> <p>A141: Grey plover (non-breeding)</p> <p>A143: Red knot (non-breeding)</p> <p>A149: Dunlin (non-breeding)</p> <p>A156: Black-tailed godwit (non-breeding)</p> <p>A162: Common redshank (non-breeding)</p> <p>Waterbird assemblage</p>	<p>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:</p> <p>The extent and distribution of the habitats of the qualifying features;</p> <p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>	Coastal squeeze, disturbance to birds, air pollution and new development.

## Appendix 4: Natural England Consultation Response

### **Draft Strategic Environmental Assessment and Habitats Regulations Assessment screening opinions**

Natural England notes that we are satisfied with the conclusions of the SEA and HRA Screening Documents; it is not necessary for a Strategic Environmental Assessment to be undertaken in relation to the SPD and we agree with the conclusion of the Habitats Regulation Assessment Screening Statement.

Implementation of the SPD will not lead to likely significant effects on protected European sites and therefore no further assessment is necessary.

Natural England  
07 Dec 2020



# Strategic Environmental Assessment Screening Opinion

## Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document

April 2021

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## 1. Introduction

In some circumstances a Supplementary Planning Document could have significant environmental effects and may fall within the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 and so require Strategic Environmental Assessment.

This screening report is designed to test whether or not the contents of the Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document requires a full Strategic Environmental Assessment (SEA). The legislative background below outlines the regulations that require the use of this screening exercise. Section 4 provides a screening assessment of the likely significant effects of the SPD and the need for a full SEA.

## 2. Legislative Background

The basis for Strategic Environmental Assessment legislation is European Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the Environment'. This document is also known as the Strategic Environmental Assessment (or SEA) Directive. European Directive 2001/42/EC was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations.

The SEA Regulations include a definition of 'plans and programmes' to which the regulations apply. SEA requirements relate to plans or programmes which are subject to preparation or adoption by an authority at national, regional or local level, which includes those prepared for town and country planning and land use. SEA is required where the plan or programme is likely to have significant environmental effects. It is therefore necessary to screen the SPD to identify whether significant environmental effects are likely. Where screening identifies significant environmental effects, a full Strategic Environmental Assessment is required.



### 3. Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC

The preparation of the SPD triggers a requirement to determine whether it is likely to have a significant environmental effect. This requirement is discharged by the 'responsible authority' being the authority by which or on whose behalf the plan is prepared. Before making a determination, the responsible authority shall: -

- a) Take into account the criteria specified in Schedule 1 to the Regulations;  
and
- b) Consult the consultation bodies.

The consultation bodies are defined in section 4 of the SEA Regulations. The opinions from the statutory consultation bodies: Historic England, the Environment Agency and Natural England, are therefore to be taken into account.

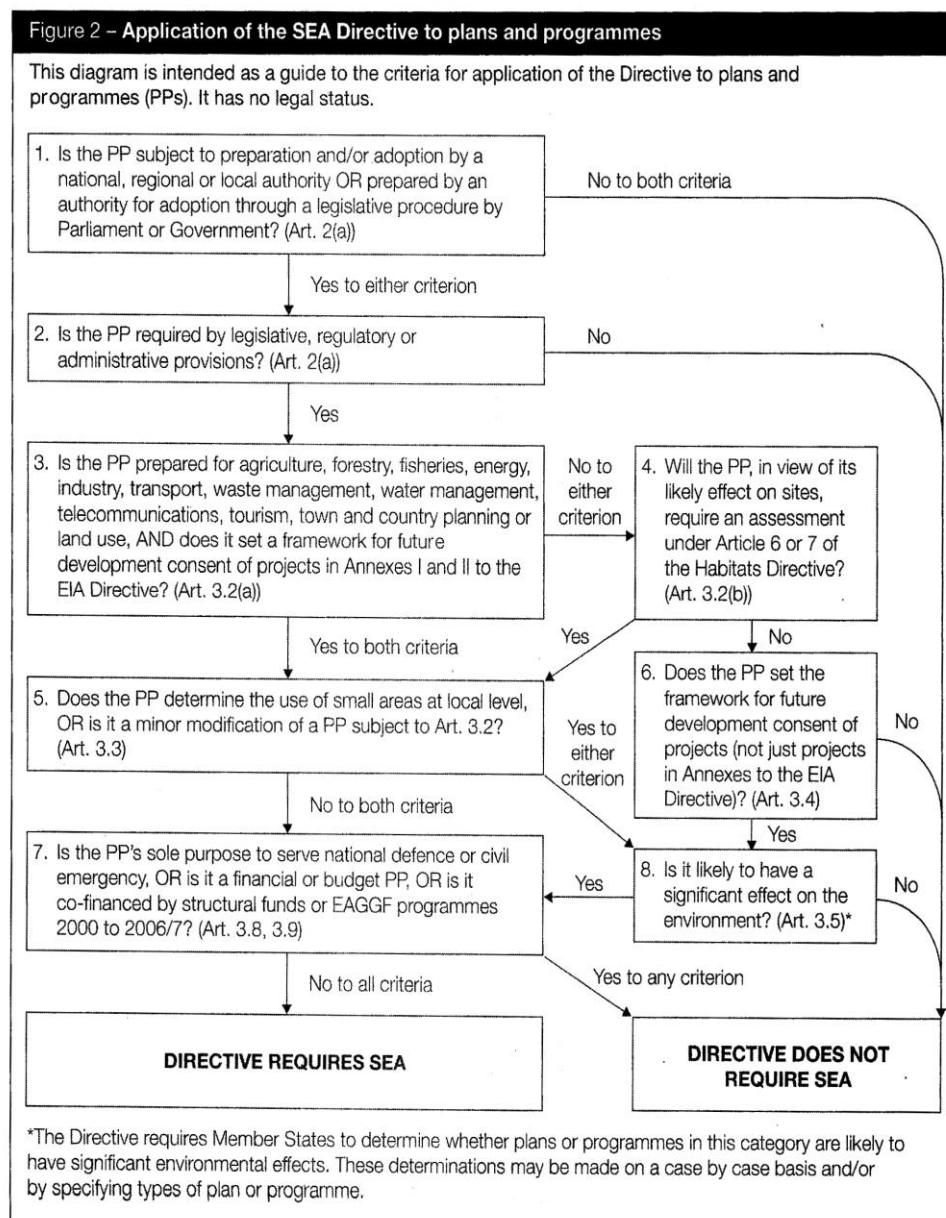
Schedule 1 of the SEA Regulations sets out the criteria for determining likely significant effects as follows:

- 1. The characteristics of plans and programmes, having regards, in particular to:
  - a. The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.
  - b. The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.
  - c. The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.
  - d. Environmental problems relevant to the plan or programme.
  - e. The relevance of the plan or programme for the implementation of community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:
  - a. The probability, duration, frequency and reversibility of the effects.
  - b. The cumulative nature of the effects.
  - c. The trans boundary nature of the effects.
  - d. The risks to human health or the environment (e.g. due to accidents).
  - e. The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
  - f. the value and vulnerability of the area likely to be affected due to:
    - i. special natural characteristics or cultural heritage;
    - ii. exceeded environmental quality standards or limit values;
    - iii. intensive land-use; and
  - g. the effects on areas or landscapes which have a recognised national, community or international protection status.

## 4. Assessment

The diagram below illustrates the process for screening a planning document to ascertain whether a full SEA is required.



Source: A Practical Guide to the Strategic Environmental Assessment Directive (2005)

The following assessment applies the questions from the preceding diagram. The answers determine whether the Neighbourhood Plan will require a full Strategic Environmental Assessment.

**1. Is the PP subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))**

Yes. The preparation and adoption of the Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document is being carried out by East Suffolk Council. The Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document is being produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

**2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))**

Yes. The production of the SPD forms part of the delivery of the statutory Development Plan and the process for preparing SPDs is set out in the Town and Country Planning (Local Development) (England) Regulations 2012 and relates to the administration of the Council's planning service.

**3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))**

The SPD is prepared in support of the delivery of town and country planning and land use policies.

The SPD will not set a framework for the future consent of projects listed in Annexes I and II of the EIA Directive.

**4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))**

A separate screening exercise has been carried out under the Habitats Directive (92/43/EEC) and Conservation of Habitats and Species Regulations (2017) (as amended). This has determined that a full Appropriate Assessment is not required.

**5. Does the PP determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)**

Not applicable (based on the responses to questions 3 and 4 above).

**6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3(4))**

Yes. The Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document will be a material consideration in the determination of planning applications and will be applied alongside the policy framework provided by the Local Plan.

**7. Is the PP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)**

No. Not applicable.

**8. Is it likely to have a significant effect on the environment? (Art. 3(5))**

No.

Appropriate Assessments carried out for the Local Plans identified a likely significant effect from increased recreational pressure on Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar Sites arising from the delivery of new housing. To address this, East Suffolk Council, Ipswich Borough Council, Mid Suffolk District Council and Babergh District Council produced a Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). This strategy set out a tariff based approach to mitigating the impact of recreational disturbance on European Sites resulting from increased housing development across the Local Authority areas.

The Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document, supports the delivery of the mitigation measures set out in the Suffolk Coast RAMS and provides a framework for implementing those provisions. The SPD also includes information for developers and applicants to assist them in meeting the other requirements under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations). The Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document builds on the approach set out in Suffolk Coastal Local Plan policies SCLP2.3: Cross-boundary mitigation of effects on Protected Habitats and SCLP10.1: Biodiversity and

Geodiversity and Waveney Local Plan policy WLP8.34: Biodiversity and Geodiversity. Both Local Plans were subject to Sustainability Appraisal including Strategic Environmental Assessment throughout their development.

## 5. Conclusion

The Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document supports the implement of policies in the East Suffolk Council-Suffolk Coastal Local Plan adopted September 2020 and the East Suffolk Council-Waveney Local Plan adopted March 2019 which were both subject to Sustainability Appraisal including Strategic Environmental Assessment.

It is considered by East Suffolk Council that it is not necessary for a Strategic Environmental Assessment to be undertaken of the Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document to ensure compliance with SEA legislation.

The draft Screening Opinion was published for consultation alongside the draft Supplementary Planning Document. The responses of the consultation bodies are contained in Appendix 1.

Signed: 

Dated: 15<sup>th</sup> April 2021

Desi Reed  
Planning Policy and Delivery Manager  
East Suffolk Council

## Appendix 1: Responses from Statutory Consultees

### Natural England

Natural England notes that we are satisfied with the conclusions of the SEA and HRA Screening Documents; it is not necessary for a Strategic Environmental Assessment to be undertaken in relation to the SPD and we agree with the conclusion of the Habitats Regulation Assessment Screening Statement.

Implementation of the SPD will not lead to likely significant effects on protected European sites and therefore no further assessment is necessary.

Natural England  
07 Dec 2020

### Historic England

With regards the draft Strategic Environmental Assessment screening report, we support the Council's conclusion that it is not necessary for a Strategic Environmental Assessment to be undertaken of the Draft Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document to ensure compliance with SEA legislation.

Andrew Marsh  
Historic England  
10 Nov 2020

### Environment Agency

*No response received.*

# Equality Impact Assessment Screening Opinion

Draft Recreational Disturbance Avoidance  
and Mitigation Strategy  
Supplementary Planning Document

October 2020



## Introduction

1. It is the Council's duty under the Equality Act 2010 to undertake an Equality Impact Analysis at the time of formulating a decision, drafting a report, designing or amending a policy. This will ensure that the Council is considering and taking positive action where possible to promote access to services for all their communities, including their wider communities. The Equality Impact Assessment Screening Assessment will assess whether there is any impact upon any of the groups with protected characteristics under the Equalities Act, which are listed in the table below. If an adverse impact upon any of these groups is identified then a full Equalities Impact Assessment will be required.
2. East Suffolk's coasts and estuaries are recognised as considerable wildlife assets. They contain areas designated as Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites (collectively referred to as European sites). These sites are protected by UK and European legislation (as amended, including through EU exit legislation) and the international Ramsar Convention. New housing growth brings new residents to the local area, and if those residents use the European Sites for recreation, which evidence suggests is likely, then pressure is increased on those European Sites. Assessing, avoiding and managing that recreation pressure is therefore an important part of planning for growth.
3. To address this, East Suffolk Council (formally Suffolk Coastal District Council and Waveney District Council), Ipswich Borough Council, Mid Suffolk District Council and Babergh District Council commissioned a Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). This strategy set out a tariff-based approach to mitigating the impact of recreational disturbance on European Sites resulting from increased housing development across the Local Authority areas. The strategy facilitates development, whilst at the same time adequately protecting European Sites from harm.
4. This Supplementary Planning Document summarises the requirements of Suffolk Coast RAMS, including the per-dwelling tariff, and provides a framework for implementing those provisions. The Supplementary Planning Document also includes information for developers and applicants to assist them in meeting the other requirements under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations).
5. This Supplementary Planning Document provides information to support the implementation of policies set out in the Councils' Local Plans and is a material planning consideration in the development management process.

6. Where a European Site could be affected by a plan or project then a Habitats Regulations Assessment must be undertaken by the competent authority. This identifies the ecological interest features of the site (such as birds, plants or animals); what they could be potentially harmed by the proposed plan or project; and assesses whether the proposed plan or project could cause that harm to occur.
7. The Local Plan Habitat Regulations Assessments for Ipswich Borough Council, Babergh District Council and Suffolk Coastal District Council (now the southern part of East Suffolk) concluded that without mitigation the level of residential growth proposed would be likely to have significant negative impacts on European sites through increased recreational use by the additional residents.
8. In response to this, East Suffolk Council (formerly Suffolk Coastal District Council and Waveney District Council), Ipswich Borough Council and Babergh District Council, with support from Natural England, jointly commissioned a Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). The inclusion of Mid Suffolk District Council and Waveney District Council (the latter now being part of East Suffolk) was triggered by the advice of Natural England. This Strategy set out a tariff-based approach to mitigating the impact of recreational disturbance on European Sites resulting from increased residential development across the Local Authority areas. The Strategy allows development, whilst at the same time adequately protecting European Sites from harm.
9. East Suffolk Council was formed in 2019 by the merger of Suffolk Coastal and Waveney District Councils. The new Council therefore uses Local Plans adopted by the former Suffolk Coastal and Waveney District Councils. The East Suffolk RAMS SPD will help to deliver policies from both the Suffolk Coastal and Waveney Local Plans, which have already been subject to EqlA screening. The relevant policies include Suffolk Coastal Local Plan policies SCLP2.3: Cross-boundary mitigation of effects on Protected Habitats and SCLP10.1 (Biodiversity and Geodiversity) and Waveney Local Plan policy WLP8.34 (Biodiversity and Geodiversity).
10. The Equality Act 2010 lists nine protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation. East Suffolk Council has added a tenth characteristic, socio-economic deprivation, in addition to the nine protected characteristics listed in the legislation. This reflects that pockets of deprivation that exist across East Suffolk.

## Screening of impact on different groups

	<b>Groups</b>	<b>Likely Impact</b> (positive/negative/no impact)	<b>Reason for your decision</b>
a	Age (Includes safeguarding issues)	No impact.	This document sets out a development tariff to support European sites affected by development and will therefore not discriminate against this group.
b	Disability	No impact.	This document sets out a development tariff to support European sites affected by development and will therefore not discriminate against this group.
d	Gender reassignment	No impact.	This document sets out a development tariff to support European sites affected by development and will therefore not discriminate against this group.
e	Marriage and Civil Partnership	No impact.	This document sets out a development tariff to support European sites affected by development and will therefore not discriminate against this group.
f	Pregnancy and maternity	No impact.	This document sets out a development tariff to support European sites affected by development and will therefore not discriminate against this group.
g	Race	No impact.	This document sets out a development tariff to support European sites affected by development and will therefore not discriminate against this group.
h	Religion or Belief	No impact.	This document sets out a development tariff to support European sites affected by

			development and will therefore not discriminate against this group.
i	Sex	No impact.	This document sets out a development tariff to support European sites affected by development and will therefore not discriminate against this group.
j	Sexual orientation	No impact.	This document sets out a development tariff to support European sites affected by development and will therefore not discriminate against this group.
i	Socio-economic deprivation	No impact.	This document sets out a development tariff to support European sites affected by development and will therefore not discriminate against this group. This includes groups who are experiencing economic deprivation, which also causes social deprivation as well. The range of measures detailed in the SCI, including making documents available online and sending hard copies of consultation materials to those who request them, will ensure that those who are experiencing socio-economic problems will still be able to access consultation materials and will not be disadvantaged.

## Consultation and Engagement

- There has been engagement with the Planning Policy and Delivery Team, Development Management the Major Sites and Infrastructure Team. During the production of the Recreational Disturbance Avoidance and Mitigation Strategy SPD.

12. Engagement took the form of meetings with members from the teams to outline the purpose and aims of the SPD and discuss content. Further discussions were held by email and draft documents were also circulated for comments. These comments were then considered and changes were made as appropriate.
13. The Council also worked with colleagues from Ipswich Borough Council (a partner within the RAMS partnership) on the drafting of the SPD. Copies of the draft SPD were shared with the RAMS steering group, which is made up of East Suffolk Council, Ipswich Borough Council and Babergh and Mid Suffolk Council.
14. In view of the current Covid-19 social distancing measures, the Council has set out measures to enable safe participation in the consultation and to ensure that those who wish to engage in the consultation are not disadvantaged. The Council would normally make hard copies of consultation documents available to view in libraries and in the Council's offices for those who are unable to view them online, however as this is not possible to do this at this time the Council has put alternative measures in place. For those unable to view the consultation documents online, hard copies are being made available on request (free of charge) by post. In view of these measures the Council does not consider that this consultation will disadvantage any of the groups covered by this EQIA screening exercise.

## Presentation in Different Languages

15. As part of a six-week period of formal consultation, the document will be published on the Council's website, with hard copies available on request for those unable to access it online. The document may be requested in a different language. When such requests are received the Customer Services Team will be involved with ensuring this request is actioned.

## Proposed Changes

16. The Council will analyse responses received during the public consultation and will make any necessary changes as a result of comments received.

## Conclusion

17. No negative impact upon any group with protected characteristics or experiencing socio-economic deprivation was identified and therefore a full Equality Impact Assessment is not required.