Suffolk Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) Habitat Regulation Assessment (HRA) Record

Application details			
Local Planning Authority:			
Case officer			
Application reference:			
Application description:			
Application address:	1		
Status of Application:			
Grid Ref:			
HRA Stage 1: screening assess	ment		
Test 1 – the significance test:	Based on the developme	nt type a	nd proximity to European designated
_			ent constitutes a 'likely significant
effect' (LSE) to a European site		-	
 Benacre to Easton Bavents Deben Estuary SPA and Rai Minsmere to Walberswick Minsmere – Walberswick S Orfordness-Shingle Street S Sandlings SPA 	rotection Area (SPA) and Rams SPA msar site Heaths & Marshes Special Are SPA	sar site ea of Consei	
Yes			No V
_	cluded in current site allocation ent dwellings and extensions) by (HMOs) cludes holiday caravans and		Conclude no LSE to the above designated sites in terms of recreational disturbance. An Appropriate Assessment (AA) is not required where recreational disturbance to these sites is the only issue or recreational disturbance to these sites can be scoped out of any HRA covering other issues.
Yes			
Conclude LSE. This proposal is with Coast RAMS as it falls within the 13 likely impacts and is a relevant resi as listed above. It is anticipated that area is 'likely to have a significant of features of the aforementioned de increased recreational pressure, wor in combination. Proceed to HRA Stage 2: Appropri recreational disturbance impacts sites.	3 km 'zone of influence' for idential development type at such development in this effect' upon the interest esignated site(s) through then considered either alone ate Assessment to assess	Habitat should non res	s not relevant, however other as Regulations considerations be taken into consideration for sidential developments and in ircumstances a bespoke AA may uired.

HRA Stage 2: Appropriate Assessment

Test 2 – the integrity test: The applicant must provide sufficient evidence to allow the Appropriate Assessment to be made, which is the stage at which avoidance and/or mitigation measures can be considered

Is the proposal on an allocated site or within the Local Plan windfall allowance? No The proposal involves development in excess of that which was considered Yes under the Appropriate Assessment of the Local Plan. Applications involving unplanned development could have in-combination recreational disturbance Is the proposal for 50+ impacts (and other impacts) on designated sites, including those listed residential units (or above. In cases such as this, consult Natural England for bespoke advice before concluding no LSE. Record evidence that mitigation measures have equivalent)? been secured in the 'Summary' section below. A proportionate financial contribution should be secured in line with the Suffolk Coast RAMS requirements, at least. On site mitigation may also be necessary depending Nο on the scale of development. Yes Is the proposal within 200m of one of the above European designated sites? Nο Yes

Annex I includes Natural England's suggested scope of mitigation requirements for development of this scale. Where it has not already been provided, seek the necessary information from the developer in line with that advice. If needed, Natural England are able to offer advice to developers and/or their consultants on the detail of this at this through their charged Discretionary Advice Service (DAS), further information on which is available here.

Record the recreational disturbance mitigation package in the 'Summary' section below.

Consult Natural England after undertaking the Appropriate Assessment of adverse effects on the integrity of European sites. If RAMS contribution and any other necessary mitigation are not secured then refuse for lack of mitigation.

A proportionate financial contribution should be secured in line with the Suffolk Coast RAMS requirements (see **Annex II**). Record evidence that this mitigation measure has been secured in the 'Summary' section below.

Consideration of further bespoke recreational disturbance mitigation measures may also be required in this case.

Consider if there are likely to be effects beyond recreational impacts.

Consult Natural England after undertaking the Appropriate Assessment of adverse effects on the integrity of European sites

If RAMS contribution and any other necessary mitigation are not secured then refuse for lack of mitigation. A proportionate financial contribution should be secured in line with the Suffolk Coast RAMS requirements (see **Annex II**). Record evidence that this mitigation measure has been secured in the 'Summary' section below.

Provided this mitigation is secured, it can be concluded that this planning application will not have an adverse effect on the integrity of the above European sites from recreational disturbance, when considered 'in combination' with other development. Natural England does not need to be consulted on this Appropriate Assessment.

If RAMS contribution is not secured then refuse for lack of mitigation.

Summary of the Appropriate Assessment: To be carried out by the Competent Authority (the local		
planning authority) in liaison with Natural England (where necessary)		
Summary of recreational disturbance mitigation package		
[INSERT]		
Conclusion		
Having considered the proposed avoidance and mitigation measures above, [INSERT LPA] conclude that with mitigation the project will not have an Adverse Effect on the Integrity of the European sites included within the Suffolk Coast RAMS.		
Having made this appropriate assessment of the implications of the plan or project for the site(s) in view of that (those) site(s)'s conservation objectives, and having consulted Natural England and fully considered any representation received (where necessary), the authority may now agree to the plan or project under regulation 63 of the Conservation of Habitats and Species Regulations 2017.		
Local Planning Authority Case Officer comments, signed and dated:		

Annex I – Natural England's recommendations for larger scale residential developments within the 13 km Suffolk Coast RAMS zone of influence (50 units +, or equivalent, as a guide)

Developments of this scale should include provision of well-designed open space/green infrastructure, proportionate to its scale. Such provisions can help minimise any predicted increase in recreational pressure to the European sites by containing the majority of recreation within and around the development site boundary away from European sites. We advise that the Suitable Accessible Natural Green Space (SANGS) guidance here can be helpful in designing this; it should be noted that this document is specific to the SANGS creation for the Thames Basin Heaths, although the broad principles are more widely applicable. As a minimum, we advise that such provisions should include:

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

Natural England would be happy to advise developers and/or their consultants on the detail of this at the pre-application stage through our charged Discretionary Advice Service (DAS), further information on which is available here.

However, the unique draw of the above European sites means that, even when well-designed, 'on-site' provisions are unlikely to fully mitigate impacts when all residential development within reach of the coast is considered together 'in combination'. We therefore advise that consideration of 'off-site' measures (i.e. in and around the relevant European designated site(s)) is also required as part of the mitigation package for predicted recreational disturbance impacts in these cases. Such measures are to be delivered strategically through the Suffolk Coast RAMS to make the sites more resilient to increased recreational pressures. A proportionate financial contribution should therefore be secured from these developments in line with the Suffolk Coast RAMS.

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

Annex II – Natural England's recommendations for smaller scale residential developments within the 13 km Suffolk Coast RAMS zone of influence (0-49 units, or equivalent, as a guide) which are not within/directly adjacent to a European designated site

Whilst the provision of well-designed open space/green infrastructure on site or contributions towards strategic green infrastructure in your district is to be welcomed for developments of this scale, we advise that consideration of 'off-site' measures (i.e. in and around the relevant European designated site(s)) is required as mitigation for predicted recreational disturbance impacts in these cases as a minimum. Such measures are to be delivered strategically through the Suffolk Coast RAMS to make the sites more resilient to increased recreational pressures. A proportionate financial contribution should therefore be secured from these developments in line with the Suffolk Coast RAMS.