

12 - Protection and Management of the Environment

Strategic Issues

- 12.01 The aims of the Plan are to ensure sustainable development can be achieved, whilst supporting the objective to contribute to conserving and enhancing our natural, built and historic environment. This includes making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including a low carbon economy NPPF (2021 Para 8).
- 12.02 To conserve and manage the environment, the Councils will employ a hierarchical approach of avoidance, mitigation and compensation.

NATURAL AND LOCAL ENVIRONMENT

- 12.03 The NPPF (2021 Para.174) advocates that local plans should contribute to and enhance the natural and local environment. A framework of policies supports this strategic approach:
- a. Environmental Protection and Conservation
 - b. Biodiversity
 - c. Landscape
 - d. Historic Environment
 - e. Change of use of Land

ENVIRONMENTAL PROTECTION AND CONSERVATION

- 12.04 Babergh and Mid Suffolk have a rich and varied natural environment, including rivers, estuaries, open spaces and countryside, but some local resources are under pressure.
- 12.05 The environmental protection and conservation measures provide a managed policy framework which is adaptable and can respond to pressures through approaches such as prevention, management, mitigation or adaptation from flood risk, water resources, land resources, pollution and climate change.

GREEN INFRASTRUCTURE

- 12.06 All components of the green infrastructure network must be managed at a strategic level to ensure cross boundary and cumulative issues and impacts are effectively managed at a strategic level. This includes natural components, such as biodiversity, geodiversity and landscape, as well as assets within settlements, including historic assets, green spaces and recreational areas.

BIODIVERSITY & GEODIVERSITY

- 12.07 Local sites of biodiversity and geodiversity value are identified in the Plan to ensure consideration can be given to the level of protection provided to these local sites – including County Wildlife Sites, County Geodiversity Sites, Local Nature Reserves and Priority species and habitats.

LANDSCAPE

- 12.08 In Babergh and Mid Suffolk, future development must be managed to respect the key features and local distinctiveness.
- 12.09 Along with Areas of Outstanding Natural Beauty (AONBs), Sites of Scientific Interest (SSSIs) and Conservation Areas, there are also less well-known features that make all landscape character areas significant and worthy of protection. It is important to recognise these elements, in order to balance interests and consider potential impacts in the future, as well as to identify any further management or guidance which may be required that goes beyond the boundaries of defined designations covered by legislation. Furthermore, in cases where mitigation measures are necessary, it may help inform the type of measures which could be appropriate.
- 12.10 There are approximately 16 identified Landscape Characters within Babergh and Mid Suffolk. Babergh makes a valuable and varied contribution to this, with the Suffolk Coasts and Heaths AONB and Dedham Vale AONB, including the Stour Valley, covering a considerable part of the District. Legislation provides protection and guidance within these areas and both have Management Plans providing a robust framework for management of challenges facing these areas in the future.

THE HISTORIC ENVIRONMENT

- 12.11 The importance of heritage assets to the historic character and distinctive appearance of both Districts should not be underestimated. The historic environment is a precious resource valued by residents, visitors and local businesses, and the attractive historic character of many of the villages and wealth of traditional buildings is the focus of a healthy and growing tourism sector.
- 12.12 The Plan seeks to continue to conserve and enhance the heritage assets throughout the Districts, for the benefit of all to enjoy as well as to enrich the quality of life through learning from local historic knowledge and thereby ensure assets are safeguarded for future generations.

CROSS BOUNDARY MITIGATION FOR PROTECTED HABITATS SITES

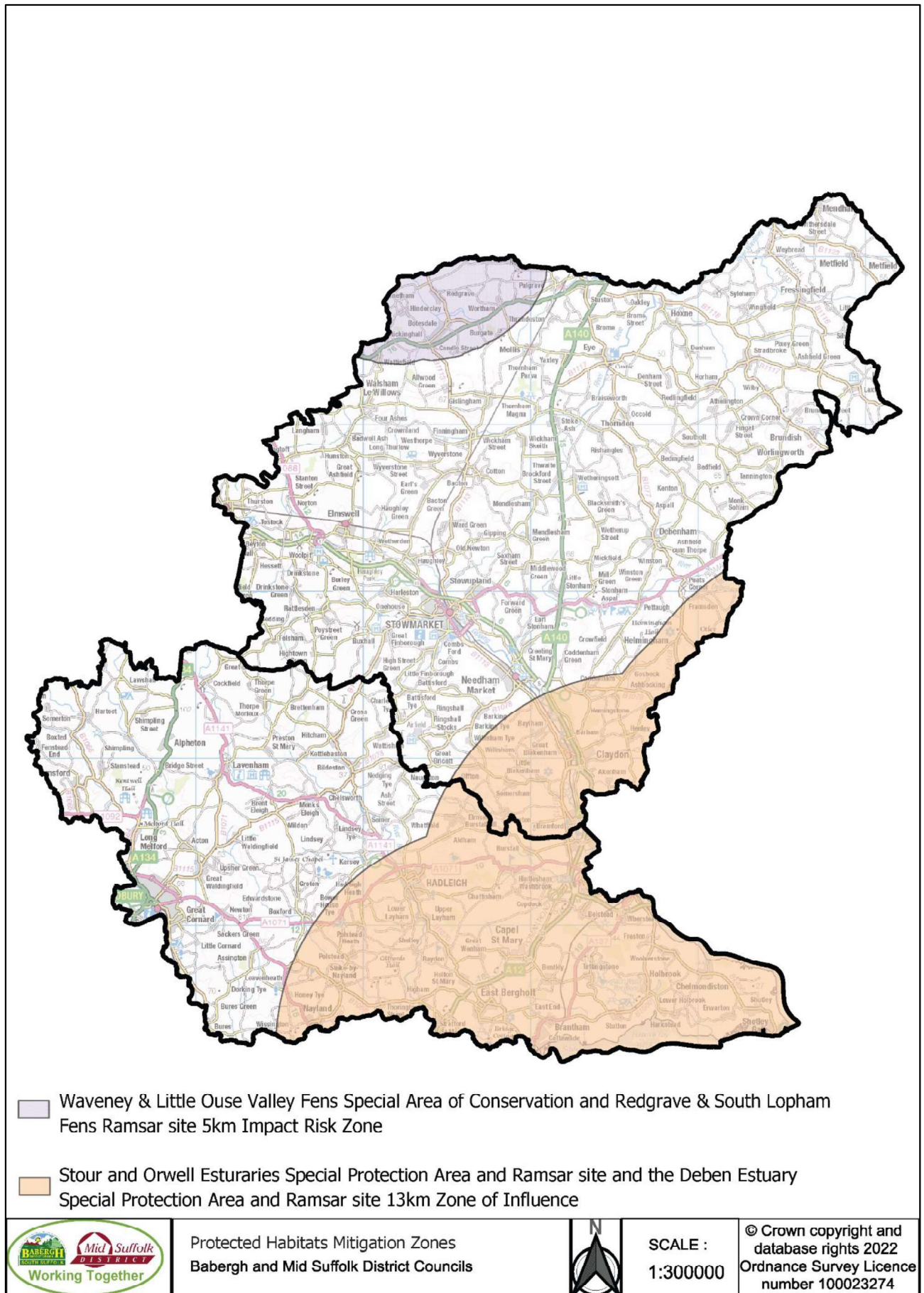
- 12.13 Protection for internationally and nationally protected sites is established in legislation. In producing the Plan, consideration has been given to the level of protection to afford to local sites of biodiversity and geodiversity value including County Wildlife Sites, County Geodiversity Sites and priority habitats and species.
- 12.14 Through previous Habitats Regulations Assessments, there has been recognition of the sensitivity of the internationally Protected Habitats Sites and the potential for significant effects arising from increased recreational disturbance related to new housing development. The sites are protected under the provisions of Wildlife and Countryside Act 1981 and Natural Environment and Rural Communities Act 2006. National policy identifies that development should initially consider whether avoidance of these sensitive areas is practical. In circumstances where this is not possible, appropriate mitigation should be provided, including being able to demonstrate well-designed open space/green infrastructure, proportionate to its scale, and prevents a significant adverse effect on site integrity to a Habitats Site. Such provisions can help

minimise any predicted increase in recreational pressure to the Habitats Sites by containing the recreation within and around the development site boundary away from Habitats Sites, in accordance with Natural England best practice advice¹⁶. Suitable Accessible Natural Green Space (SANGS) guidance¹⁷ can be helpful in achieving this, including provision of high-quality, informal, semi-natural areas; circular dog walking routes of at least 2.7 km within the site and/or with links to the surrounding public rights of way; dedicated 'dogs-off-lead' areas; signage/information leaflets to householders to promote these areas for recreation; dog waste bins; and a commitment to the long-term maintenance and management of these provisions.

- 12.15 Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney Councils (now East Suffolk Council) are taking a joined-up approach to mitigating these impacts. For Babergh and Mid Suffolk, these relate to the Stour and Orwell, and Deben estuaries. The Councils have produced a Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS), which identifies and costs the measures necessary to mitigate recreational and leisure impacts and confirms how they will be funded from residential development. The intention of the strategy is to avoid adverse effects on the integrity of the Habitats Sites, in combination with other plans and projects, over the Plan period.
- 12.16 Strategic projects may require joint working by public bodies, to ensure the requirements of the Habitats Regulations are met.

¹⁶ Letters from Natural England dated 25th May 2016, 22nd June 2017 and subsequent Annex I referenced in the Babergh and Mid Suffolk Joint Local Plan Habitats Regulations Assessment (Oct 2020).

¹⁷ Natural England SANGS guidance (Aug 2021).



- 12.17 Proposals for development will need to consider internationally designated sites, particularly where they are identified within the relevant Impact Risk Zones and/or Zones of Influence (otherwise referred to under the general term 'Protected Habitats Mitigation Zones').
- 12.18 Development that falls within the Impact Risk Zones for Redgrave & Lopham Fens Ramsar site and Waveney & Lt Ouse Valley Fens SAC will trigger consultation with Natural England. The 5km Impact Risk Zone for these designations are identified on the Protected Habitats Mitigation Zones map and is also identified on the Natural England MAGIC online map.
- 12.19 The Councils will continue to work with other authorities throughout the Plan period, to ensure that the Protected Habitats Mitigation Zones, strategies and mitigation measures are kept under review in partnership with Natural England and other stakeholders. The RAMS 13km Zones of Influence (ZOI) as identified on the Protected Habitats Mitigation Zones map were established in response to evidence to provide an indication of the geographical extent to which recreation pressure may be relevant for each European site, i.e. the geographical zone around each European site, within which new development defined through the RAMS Strategy may pose a risk in terms of additional recreation pressure. For all other development within the Stour and Orwell Estuaries Protected Habitats Mitigation Zone, a 13km Impact Risk Zone will apply, which will trigger consultation with Natural England for further ecological considerations, on a site-by-site basis.
- 12.20 The Councils are also currently working in a county-wide partnership on a cross-boundary project, to identify wildlife corridor networks. This will be used as baseline data for creating, conserving and enhancing wildlife corridors and to support biodiversity net gain requirements.
- 12.21 Monitoring of biodiversity net gain will be undertaken annually on a District level, in line with government requirements.
- 12.22 All development within or directly adjacent to Protected Habitats Sites, will be required to ensure the construction will avoid adverse effects on site integrity of the relevant Protected Habitats Site, in accordance with legislation. This will be required at the application stage.
- 12.23 The Councils commenced the monitoring of air quality from traffic on roads within 200 metres of Protected Habitats Sites in September 2021. An Air Quality Monitoring Plan has been agreed with Natural England for the collection of Nitrogen Dioxide (NO₂) and Ammonia (NH₃) emissions over the period 2021 to 2022. The Part 2 Plan will provide an appropriate stage and timescale to determine whether the planning policies are having (or could have) an adverse effect on the integrity (AEOI) of the relevant Protected Habitats Sites.

SP09 –Enhancement and Management of the Environment

- 1) The Councils will require development to support and contribute to the conservation, enhancement and management of the natural and local environment and networks of green infrastructure, including: landscape, biodiversity, geodiversity and the historic environment and historic landscapes.**
- 2) Development within the identified Protected Habitats Sites Mitigation Zone should seek to avoid harm in the first instance. Where this is not possible, development will be required to demonstrate adverse effects on site integrity will be avoided from increased recreational pressure. Development consisting of over 50 dwellings will be required to demonstrate well-designed open space/green infrastructure, proportionate to its scale. Development will also be required to make appropriate contributions through legal agreements towards management projects and/or monitoring of visitor pressure and urban effects on Habitats Sites and be compliant with the HRA Recreational Disturbance and Avoidance Mitigation Strategy. Development will otherwise need to submit separate evidence of compliance with the HRA regarding predicted impacts upon relevant designated sites.**
- 3) All development that would have an impact on a Protected Habitats Site, will be required to embed mitigation measures to avoid adverse effect on integrity.**
- 4) Through biodiversity net gain, all development will be required to protect and enhance biodiversity ensuring the measures are resilient to climate change.**
- 5) Where the monitoring of air quality from traffic on roads within 200 metres of Protected Habitats Sites demonstrates an adverse effect on their integrity, then the Councils will address any mitigation measures required in the Part 2 Plan.**

Climate Change

- 12.24 The Plan aims to future proof all development from the impact of climate change, by supporting the transition to a low carbon future in a changing climate, .taking account of the long-term implications for flood risk, coastal change, water supply, biodiversity, landscape and visual impacts, the risk of extreme winter and summer temperatures, and overheating from rising temperatures. This should underpin both plan-making and decision-taking (NPPF, 2021, Para. 20). The Plan seeks to meet these aims through a combination of climate change policies, including issues on sustainable construction, design, energy, flood risk and water management.