

Clarification Summary

for

Suffolk Coastal District Council
Proposed Submission Core Strategy and
Development Management Policies

January 2010



Issue

Quality control

Clarification Summary

for

Suffolk Coastal District Council
Proposed Submission Core Strategy and Development Management Policies
Appropriate Assessment

| | |
|---|--|
| Checked by Project Manager: | Approved by: |
| Signature:  | Signature:  |
| Name: Nicholas Sibbett | Name: Dr Jo Parmenter |
| Title: Senior Ecologist | Title: Associate Director |
| Date: 5 th January 2010 | Date: 5 th January 2010 |

The Landscape Partnership is registered with the Landscape Institute, the Royal Town Planning Institute, and is a member of the Institute of Environmental Management and Assessment

The Landscape Partnership

Registered office
Greenwood House
15a St Cuthberts Street
Bedford
MK40 3JB

Registered in England No. 2709001

Contents

| | | |
|---|--|---|
| 1 | Introduction | 1 |
| 2 | Clarifications for Section 5 of the appropriate assessment | 1 |
| 3 | Clarifications for Section 6 of the appropriate assessment | 3 |
| 4 | Clarifications for Section 7 of the appropriate assessment | 4 |
| 5 | Clarifications for Section 9 of the appropriate assessment | 5 |

Figures

| | |
|----|--|
| 01 | Bar chart of visitors to the Suffolk Coast and Heaths AONB |
|----|--|

Part 1: Text

1 Introduction

- 1.1 In December 2008, Suffolk Coastal District Council published its Preferred Options for its Local Development Framework Core Strategy and Development Management Policies. This document sets out the Council's vision for the area to 2025. It then sets out the objectives that a planning strategy must work to if the vision is to materialise. Strategic planning policies then follow, with an emphasis on the 'spatial' aspect. Finally, a suite of Development Management policies will provide guidance upon any detailed aspects.
- 1.2 A draft of the Submission stage was published on Suffolk Coastal District Council's website as part of the agenda for discussion by Cabinet in their meeting on 7th July 2009. Subsequently, the Housing Distribution section was formally made available for public comment, with the Appropriate Assessment, in September 2009 with the consultation period expiring on 18th November 2009. Comments were received primarily from Natural England, in a letter dated 18th November 2009, which included a number of queries about the contents of the Appropriate Assessment, particularly the most complex sections. To help answer these questions, a meeting was held with Natural England on 7th December 2009 during which it was agreed that a Clarification Summary would be a helpful way of answering those queries. This document is the result of that meeting, but it is also considered that this Clarification Summary may be of wider public interest.
- 1.3 'Clarification Summary' means that the contents of the Appropriate Assessment are summarised and presented in a more-easily understood format. However, no material changes have been made to the Appropriate Assessment itself.
- 1.4 This document sets out clarification of the Appropriate Assessment using the numbered sections of the Appropriate Assessment. Sections 1 – 4 and 8 of the Appropriate Assessment are less complex and so no clarification is necessary for those sections. The Appropriate Assessment considers the combined impact of allocations in both Ipswich Borough and Suffolk Coastal, as well as in Suffolk Coastal alone, which is why there are numerous references to Ipswich Borough below.

2 Clarifications for Section 5 of the Appropriate Assessment

Increase in visitors to European sites

- 2.1 The calculations of increased visitors to European sites are complex. Initially, one would expect that a 9.1% increase in the combined population of Ipswich Borough and Suffolk Coastal District to cause a 9.1% increase in visitors to European sites in the Suffolk Coast and Heaths AONB. In reality, a 9.1% increase in population will result in a proportionate increase from only those visitors who come from Ipswich Borough and Suffolk Coastal District. Visitor numbers from elsewhere are unchanged, so the increase in the total number of visitors will be less than 9.1%.
- 2.2 There is relatively little data available about visits to European sites. A study of visitors to the Suffolk Coast and Heaths AONB conducted in 2004 provides some of the best data available. Data presented in Section 5.3 of the Appropriate Assessment shows that about half (55%) of visitors to the Suffolk Coast and Heaths AONB were local people on a day trip, with the remainder being holiday makers staying in tourist accommodation. Of the locals on a day trip, about half (49.5%) were from Ipswich Borough and Suffolk Coastal District, with the remainder from elsewhere, for example, from Norwich or Bury St Edmunds. Combining these figures, half the visitors being on day trips, and half of those being from Ipswich Borough and Suffolk Coastal District, the calculation is that roughly one-quarter of all visits to the AONB are from Ipswich Borough and Suffolk Coastal District. This is the assumption applied to the European sites also.
- 2.3 With roughly around one-quarter of the day trips coming from residents in Ipswich Borough and Suffolk Coastal, those day trips are predicted to rise in proportion with the predicted 9.1% population increase i.e. the number of day trips from Ipswich Borough and Suffolk Coastal are expected to rise by 9.1% in the period 2001 - 2021. However, other sources of visitors (holidaymakers or day trips from elsewhere) will not rise accordingly, so the total visits from all sources is calculated to rise by around 2.48%. These figures are given here as approximates for simplicity of understanding, although the calculations in the Appropriate Assessment are much

more detailed and broken down by individual broad allocations in the two Councils' Core Strategy documents. Figure 1, which is drawn to relative scale, is a bar chart where the length of the bar represents the number of visitors in each group. It shows the effect of the 9.1% increase in day trips from Ipswich Borough / Suffolk Coastal District in relation to the total visits from all sources.

- 2.4 There are a number of assumptions made regarding these calculations and people's behaviour, which are listed in full in the Appropriate Assessment. Some of these assumptions are listed here
- 'New' people in the Borough / District will have the same visiting pattern as 'existing' people
 - Visits by holiday makers will not be changed by any increased use by local visitors
 - Sites, including their car parks, will not constrain the number of visits by becoming 'full' and turning away visitors
 - The separate breakdown of visits into 'day-trippers' and 'holidaymakers' was undertaken in the school summer holiday period when a greater proportion of 'holidaymakers' may have been present compared to other months
- 2.5 To allow for these assumptions, the approximate 2.48% increase in total visitors to the AONB was given as a range of 2% - 5%.

Population increases used for day visitor calculations

- 2.6 The Appropriate Assessment uses an average figure of population increase of 1.38 people per new dwelling in Ipswich Borough, and 0.9 people per new dwelling in Suffolk Coastal District. These figures initially seem low, particularly where it appears that less than one new person on average will 'occupy' a new dwelling in Suffolk Coastal District. However, these figures are not occupancy rates for the new dwellings and should not be read as such. As described in the Appropriate Assessment, these figures are derived from Suffolk County Council population predictions, based on the proposed housing growth¹. The increase in population predicted by Suffolk County Council was divided by the policy-led increase in dwellings, to calculate a net increase in population ratio of 0.9 people per dwelling in SCDC area and 1.38 people per dwelling in IBC area. This is not an assumption about the occupancy rate of new dwellings, as clearly some multiple person households already living in the area will fragment and disperse into the new dwellings, or some dwellings (existing or new) may be bought as holiday homes with zero occupancy. This reflects a trend towards a lower occupancy level per house caused by an increase in split households, an ageing population and the number of second homes across the Borough and District as a whole
- 2.7 In other words some of the residents of those additional dwellings will come from existing dwellings within the area and so not be 'new' additional people. The patterns of people moving out of, within, between and into, Ipswich Borough or Suffolk Coastal District are complex, but the population predictions are realistic and there are no better alternatives.

Population increases for specific sites close to new allocations

- 2.8 Where a large allocation of housing is proposed close to a European site, the impact of the new population close to that site relates to the population increase at that location, and is not necessarily balanced by reductions in household size at further distance. This is implied in Section 5 of the Appropriate Assessment as impacts on local sites from people living close to them are treated separately from day visits to places further away.

Population impacts for specific sites close to new allocations

- 2.9 Section 5 of the Appropriate Assessment explains that the majority of people will not walk over 1km from their home to regularly visit a local site, and will not drive over 8km from their home to regularly visit a local site. In this context, a 'local site' is one frequently used for regularly occurring activities such as dog walking. Of course, people will drive further to other sites, but this

¹ 'Projected changes in the population' undated document with file name *Populationprojection01to21updated in2009.pdf* which is available from <http://www.suffolk.gov.uk/CouncilAndDemocracy/AboutSCC/SpecialistSupportFunctions/PlanningAndPerformanceImprovement/Demography+and+Population+Data.htm>

does not usually occur on a regular repeated basis, and these more distant trips are considered in the assessment of 'day trips' across the wider area. These distances have caused some misunderstanding as they have been misinterpreted by some consultees as no-build buffer zones. The distances are used in the Appropriate Assessment as a tool to predict where there may be increased regular repeated visits from new developments to European sites. These distances are not no-build buffer zones.

- 2.10 In the Dorset² example given in the Appropriate Assessment, and in the Thames Basin Heaths, development control policy has been to prevent development within 400m of European sites to prevent immediate impact, and to require that development within 5km of European sites is mitigated by the provision of alternative greenspace for recreation by the residents of the new houses and residents of existing houses. The Government's South-East Plan clearly sets this out in its Policy NRM³ for the Thames Basin Heaths. It is considered that the use in the IBC/Suffolk Coastal Appropriate Assessments, of 1km instead of 400m (for walking distance), and 8km instead of 5km (for driving distance), as thresholds for considering impacts from large allocations on local specific sites, is a highly precautionary approach compared to the precedent set in the South-East of England where the urban density is much higher than Suffolk. It was not thought necessary to include any distance threshold, even for assessment purposes, in The East of England Plan. These thresholds do not prevent detailed proposals outside these thresholds from being separately assessed under the Habitats Regulations on an individual basis.
- 2.11 Where people travel greater distances than in the above thresholds, their impact is separately considered in the assessment of 'day visitors' to European sites in the wider area. Section 7 therefore assesses the impact of new housing development near local specific sites (within the 1km / 8km thresholds) separately to the impact of new housing development on sites in the wider area. This is because people living within these distances of a European site are likely to visit more frequently than if the European site were further away.
- 2.12 Within the Suffolk Coastal LDF Updated Preferred Option 07/09⁴ of September 2009, an allocation of 2000 houses at Martlesham was proposed, as assessed in the Appropriate Assessment. There is no 'site plan' but the allocation is in the region of Martlesham Creek, part of the Deben Estuary SPA. This is why Section 7 of the Appropriate Assessment proposes significant extra mitigation for the Deben Estuary SPA to account for the increased visitors from the proposed housing.
- 2.13 There is also an allocation in the Felixstowe area, in the region of the Stour and Orwell Estuaries SPA. This is why Section 7 of the Appropriate Assessment proposes significant extra mitigation for the Stour and Orwell Estuaries SPA to account for the increased visitors.

3 Clarifications for Section 6 of the Appropriate Assessment

Assessments of housing impact

- 3.1 The potential housing impacts are assessed in the absence of mitigation in this Section. Impacts on European sites in the wider AONB area are assessed for the broad allocations in Suffolk Coastal District alone, and again for the Ipswich Borough allocations in combination with allocations in Suffolk Coastal District. For the combined allocations, it was not possible to conclude that there would be no impact resulting from an increased number of visitors to European sites from an increased population. However, the sites and locations where a small increase in visitors might provide a tipping point above which harm might be caused, could not be identified.
- 3.2 Subsequently, specific European sites close to large housing allocations were assessed, as these sites would attract a larger increase in visitors compared to the wider area; people are likely to make regular repeated visits to sites within 1km (if walking) or 8km (if driving) of their home, compared to more distant sites. The Deben Estuary SPA near Martlesham, and the Stour and

² see <http://boroughofpoole.com/go.php?structureID=strategiesandplans&ref=195> accessed on 4th January 2010

³ available from <http://www.gos.gov.uk/gose/planning/regionalPlanning/815640/> accessed on 14th December 2009

⁴ available from <http://suffolkcoastal.jdi-consult.net/ldf/readdoc.php?docid=4&chapter=7&docelemid=d123#d123> accessed on 5th January 2009

Orwell Estuaries SPA near Felixstowe, were identified as sites where additional impact may occur from Suffolk Coastal District allocations, in the absence of mitigation.

Assessment of other policies

- 3.3 No other policies apart from housing were assessed as creating an impact upon European sites.

4 Clarifications for Section 7 of the Appropriate Assessment

Mitigation for an increase in visitors to European sites in the wider area

- 4.1 The first mitigation technique to reduce the number of visits to European sites is to provide an alternative place for countryside recreation, particularly for those people who are seeking open space for recreational purposes rather than wishing to visit sites possessing European qualifying features. A new Country Park, to the north-east of Ipswich is proposed, and committed to, to act as this alternative recreational area. The Country Park will be used by residents of both new and existing housing, and by residents of both Ipswich Borough and Suffolk Coastal. It will attract a significant proportion of the recreational demand for the area but in itself cannot be guaranteed to prevent all the increase in recreational activity on European sites.
- 4.2 The second mitigation measure requires the identification of key sites where visitor pressure is currently, or close to, causing harm, and/or where an increase could cause harm, and develop mitigation through
- identifying the origin of visitors to those identified key sites
 - writing and implementing a visitor management plan for key sites without such a plan, or
 - revising existing plans, to reduce visitor impact.
 - changing visitor infrastructure (e.g. car parks, paths), new or revised interpretation, wardening, provision of alternative recreation opportunities in less sensitive locations, etc, bylaws, identification of parts of sites where recreation will not be encouraged, etc.
 - developing a monitoring programme, to determine visitor numbers and allow the impact of the visitor numbers to be identified, throughout time
- 4.3 This second mitigation measure, implemented with partners, will prevent any adverse effect upon the integrity of European sites in the wider area.

Mitigation for an increase in visitors to specific local European sites

- 4.4 The first mitigation technique given for housing allocations at Martlesham and Felixstowe was to avoid European sites, with a clear guidance that allocations should be over 1km from the estuaries. No 'site plans' are included within the Core Strategy, but providing that the allocations are over 1km away from the SPAs there would be few extra people visiting the SPAs and little impact.
- 4.5 It is considered in the Appropriate Assessment that sufficient provision of accessible greenspace was made in association with allocated housing at Martlesham and Felixstowe, there was unlikely to be an impact upon the respective SPAs in the area. No 'site plans' are included within the Core Strategy, but providing that the allocations are over 1km away from the SPAs there would be few extra people visiting the SPAs and little impact.
- 4.6 Mitigation for the large allocations at Martlesham and Felixstowe is therefore aimed at the provision of sufficient greenspace, in terms of size, location and attractiveness, to reduce visitor impact on the respective estuaries.
- 4.7 Consultees may consider that there may be an increase in visitors to the respective estuary near the allocations at Martlesham or Felixstowe, even if any sites which may come forward are outside the 1km walking distance threshold for regular repeated visits. The Appropriate Assessment includes this consideration, as an impact to sites in the wider area, where visitor management will be required (see paragraph 4.2 above).

5 Clarifications for Section 9 of the appropriate assessment

The evidence base

- 5.1 In a meeting with Natural England on 7th December 2009, it was agreed that the Appropriate Assessment was written using the best evidence available. Although it would have been desirable to have had better evidence of visitor numbers on European sites, it would not be reasonable to delay the Appropriate Assessment, and therefore the Core Strategies and Policies, for a number of years until further evidence was collected.
- 5.2 The level of evidence within the Appropriate Assessment meets or is above the minimum needed to support the assessments, so the conclusions are sound.






Further work needed

- 5.3 The Appropriate Assessment sets out further studies that would help the understanding of visitors on European sites, even in the absence of the housing provision. In particular, visitor surveys at European sites to identify visitor numbers and origins, would help work out where increased management measures would be of nature conservation benefit.
- 5.4 This further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress. It is mentioned to raise the issue that was uncovered by the process of writing this assessment, that the impact of existing visitors is very patchily known. The mitigation mentioned in Section 7 would encompass a significant proportion of this further work.
- 5.5 Although Natural England was suggested as a lead in these studies, there is no commitment for Natural England to lead and another lead partner may be found. As well as those organisations listed in the Appropriate Assessments, it would be helpful to involve voluntary organisations such as Estuary Management Groups.

Figure 1



Key

-  Visitors on holiday (45% of total existing)
-  Day trips (55% of total existing)
-  Day trips from elsewhere (50.5% of day trips)
-  Day trips from Ipswich and Suffolk Coastal (49.5% of day trips)
-  9.1% increase in day trips from Ipswich and Suffolk Coastal
▶ equivalent to 2.48% increase in total visitors

Suffolk Coastal District Council
LDF Appropriate Assessment

Visitors to the Suffolk Coast and Heaths AONB

Figure 01

January 2010
