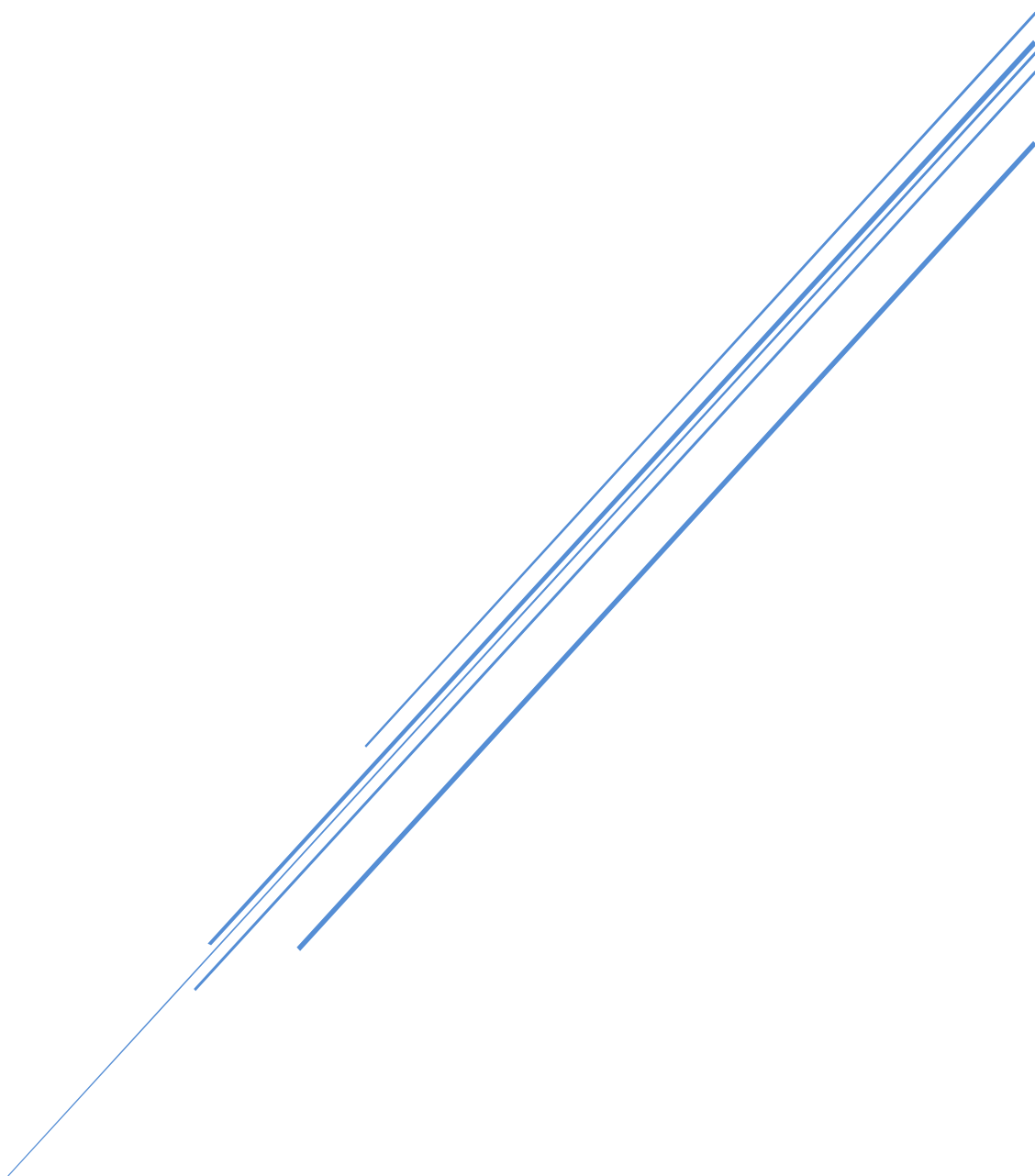


BABERGH & MID SUFFOLK JOINT LOCAL PLAN

Topic Paper: Natural Environment



March 2021

Joint Local Plan Topic Paper

Natural Environment

Purpose of topic paper –

This topic paper is one in a series in the [Core Document Library](#), which sets out how we have developed the policies within the Babergh and Mid Suffolk Joint Local Plan (JLP). Each topic paper will look at the relevant national and local guidance that informs the Joint Local Plan. Topic papers explain how the policies have developed, in addition to the information, evidence and feedback that have informed the choices made in formulating the policies.

The intention of the topic papers is to provide background information; they do not contain any policies, proposals or site allocations. Topic papers have been produced to accompany the Joint Local Plan through the process to adoption.

The issues covered by this topic paper are:

- The national policy context for the natural environment.
- An overview of key evidence which has been used to inform the policy options, approach taken in the JLP.
- An appraisal of the local natural environment context and policy considerations.
- An overview of the local plan policy approach for protecting and enhancing our natural environment.
- An overview of how the Local Plan Policy has informed the Local Plan Policies for robust approaches to strengthen the Natural Environment.

POLICY CONTEXT

National context

Local plan policies must be positively prepared, justified, effective and consistent with national policy and legislation. The National Planning Policy Framework (NPPF) sets out the overarching planning policy framework, supported by Planning Practice Guidance (PPG). Legislation and statements from government

National planning policy and guidance

The NPPF (particularly at paragraphs 170 – 183) provides comprehensive guidance to Local Planning Authorities on the Natural Environment.

The PPG provides a greater understanding for all areas of the Natural Environment – Landscape Character Assessments would complement Natural England's Character Area profiles. Local Planning Authorities should pursue sustainable development which achieves net gain for nature. The contribution to conserving and enhancing the natural environment and reducing pollution forms one of the core principles for planning.

EVIDENCE BASE

The National Planning Policy Framework requires us to develop policies based on up to date evidence. Our evidence base comprises documents that have helped inform past and current stages of our Joint Local Plan policy development; emerging evidence will help inform future development of policies for the Joint Local Plan.

The key pieces of evidence base relevant to Natural Environment are:

Regional

- Analysis of Accessible Natural Greenspace Provision for Suffolk (Natural England 2010)
- Suffolk Countryside Strategy (2015)
- 'In Step with Suffolk' Rights of Way Improvement Plan 2006 – 2016 (2006) (SCC)
- The Suffolk Historic Landscape Characterisation (SCC, version 3 2008)
- Suffolk Planning Biodiversity Action Plan (2012)
- Suffolk Geodiversity Action Plan (March 2006)
- Suffolk Biodiversity Action Plan, Updated December 2004
- Suffolk's Nature Strategy (2015)
- Dedham Vale AONB and Stour Valley Management Plan 2016 - 2021
- Suffolk Coasts and Heaths AONB Management Plan 2018 – 2023
- The Suffolk Landscape Character Assessment (SCC, 2011)
- Essex and South Suffolk Shoreline Management Plan (Oct 2010) (Environment Agency)
- SCC – Adopted Mineral Core Strategy (Sept 2008)
- SCC – Adopted Minerals Site Specific Allocations DPD (Sept 2009)

Local

- Core Strategy Focused review habitat regulations Assessment 2011
- SAAP Habitat Assessment 2011
- Mid Suffolk Contaminated Land Strategy (revised 2003)
- Contaminated Land Strategy, Babergh DC (Apr 2009)
- Babergh Green Infrastructure Framework (2012)
- Suffolk Coast RAMS (2019)
- Babergh and Mid Suffolk Landscape character Assessment (2015)
- BMSDC Heritage and Settlement Sensitivity Assessment (2018)
- Settlement Sensitivity Assessment – Ipswich Fringe (2018)

APPRAISAL

The following section brings together relevant legislation and key evidence base findings where appropriate. It highlights the main areas relevant to formulating a Joint Local Plan policy approach for the Natural Environment in our districts and indicates how this has informed the choices made during the development of the policies.

Local Context

The natural environment of Babergh and Mid Suffolk supports a rich and diverse variety of landscapes and habitats which support a valuable biodiversity. A variety of habitats are dispersed across the two Districts. Particularly important habitats are located along the estuaries and the river valleys. The importance of these habitats is recognised through a number of designations which include international designations (Special Protection Areas and Special Areas of Conservation), national designations (Sites of Special Scientific Interest) and local areas of importance (County Wildlife Sites). These designations contribute to a unique countryside and estuary/coastal areas of Suffolk which provide opportunities and challenges for housing development.

The Councils have sought to address this by working alongside Ipswich Borough Council and East Suffolk Council, through the production of a combined Recreational disturbance, Avoidance and Mitigation Strategy (RAMS) for the (estuary/coastal) area (Document EE09). The strategy has been drafted by specialist consultants as a Technical Report which supports local plans and gives developers the option to contribute to an agreed and costed scheme of mitigation. This applies to residential developments within the zone of influence, over the plan period. A map of page 56 of the Joint Local Plan, and the relevant background text to settlements, illustrates the areas of Babergh and Mid Suffolk which are within the RAMS 13km Zone of Influence.

The plan makes provision to contribute and enhance the natural environment by protecting and enhancing the biodiversity and geodiversity value and providing measurable net gains for biodiversity.

The rich and varied natural environment of both districts include rivers and estuaries, open spaces and countryside, but some local resources are under pressure. The Joint Local Plan has sought to address these pressures by making provision for the effective use of land, using natural resources prudently and minimising waste and pollution.

It was noted that there was a need to safeguard the character of both districts countryside by ensuring new development integrates positively with the existing character and therefore be in line with current NPPF requirements.

Former Local Plans sought to address sensitivities of landscape and development through the identification of Special Landscape Areas, Visually Important Open Spaces and Area of Visual and Recreational Amenity. This was considered a partial and fragmented approach, which was based upon now outdated evidence used to support the former Structure Plan (1998), and is no longer considered to be effective. The Councils have produced Landscape Guidance (Document D08), which identifies the specific landscape and settlement characteristics of the Districts. In line with this, in areas outside of the two Areas of Natural Beauty (AONB), the Joint Local Plan seeks to enhance all landscapes within the districts, rather than specific areas, through the application of Policy LP19. Where open spaces function as sporting and/or recreational spaces (in line with the Councils Open Space Assessment (Document EE10) they are designated as open spaces under Policy LP30 of the JLP.

It is also acknowledged that the landscape and the historic environment have a strong inter-relationship, as the character of the landscape is influenced by historic assets and their settings, as well as traditional villages and historic townscapes. Equally, the landscape can be important to the setting of historic assets. In 2018, the Councils commissioned a Heritage and Settlement Sensitivity Assessment (Document EE05) and Ipswich Fringe Landscape Assessment (Document EE07). Furthermore, in response to Regulation 18 comments, the Councils commissioned further assessment of the historic environment (Document EE13, EE14 and EE15) and a Landscape Sensitivity Assessment (Document EE12) of all potential development sites identified within the Councils Strategic Housing and Economic Land Availability Assessment (SHELAA) (Document EH06). All of these documents include consideration of the inter-relationship between the historic environment and landscape have been used to inform the Joint Local Plan.

Local Plan Policies include Enhancement and Management of the Environment, Environmental Protection, Biodiversity & Geodiversity, Landscape and the AONB.

Neighbourhood plans

Neighbourhood planning enables Neighbourhood Forums and Parish Councils to develop a vision and planning policies for a designated neighbourhood area. Those 'Neighbourhood Development Plans' (NDP) which are successfully adopted will form part of the statutory development plan for the area that they cover. Where a NDP is adopted or emerging before an up-to-date Local Plan is in place, the local planning authority should take it into account when preparing Local Plan policies

There are currently five made NDP in Babergh, two at examination stage, four under consultation and nineteen NDP's currently in progress. For Mid Suffolk there are eight made NDP, five at local referendum stages, two at examination stage, two under consultation and nine NDP's currently in progress.

Aldham NDP policy ALD7 requires financial contributions for all residential development that falls within the zone of influence of European sites. There is not considered to be a conflict between the JLP Natural Environment Policies and ALD7, or any other policies of the Aldham NDP.

Botesdale and Rickinghall NDP policy B&R11 requires development to protect, enhance and harmonise with the identified local landscape sensitivity areas. There is not considered to be a conflict between the JLP Natural Environment Policies and B&R11 or any other policies of the Botesdale and Rickinghall NDP.

East Bergholt NDP policy EB6 requires development to take into account impact upon the Dedham Vale AONB and the East Bergholt Landscape Sensitivity and Capacity Assessments. There is not considered to be a conflict between the JLP Natural Environment Policies and EB6, or any other policies of the East Bergholt NDP.

Debenham NDP policy DEB14 requires development to respect and seek to preserve the character of adjacent countryside, green spaces and landscape setting. Policy DEB19 seeks

to ensure development is designed to have positive and distinctive character with site features including views of highly valued landscape as identified in the Debenham NDP proposals map. Policy DEB20 seeks to improve connectivity between wildlife areas and green spaces. There is not considered to be a conflict between the JLP Natural Environment Policies, DEB14, DEB19 and DEB20 or any other policies of the Debenham NDP.

Elmsett NDP policy EMST7 requires development to protect enhance and harmonise with the identified local landscape sensitivity areas, EMST9 seeks the protection of important views and landscape character. There is not considered to be a conflict between the JLP Natural Environment Policies, EMST7 and EMST9, or any other policies of the Elmsett NDP.

Fressingfield NDP policy FRES 6 seeks to protect landscape character and natural assets. There is not considered to be a conflict between the JLP Natural Environment Policies and FRES 6, or any other policies of the Fressingfield NDP.

Haughley NDP policy HAU14 seeks to protect the rural landscape by requiring development to be designed to minimise adverse impact upon landscape and enhance landscape character where possible. There is not considered to be a conflict between the JLP Natural Environment Policies and HAU14, or any other policies of the Haughley NDP.

Lavenham NDP policy ENV1 requires development to respect views in and out of the historic village core, with full appreciation of the valued surrounding landscape. There is not considered to be a conflict between the JLP Natural Environment Policies and ENV1, or any other policies of the Lavenham NDP.

Lawshall NDP policy LAW7 seeks to protect existing natural environmental assets of Lawshall. Policy LAW8 seeks the protection and maintenance of features of biodiversity value. LAW10 requires development to protect or enhance the special landscape qualities identified in the Landscape Character Assessment. There is not considered to be a conflict between the JLP Natural Environment Policies, LAW7, LAW8 and LAW10, or any other policies of the Lawshall NDP.

Mendlesham NDP policy MP10 seeks to protect the visually important open spaces for their contribution to the character and appearance of their surroundings. There is not considered to be a conflict between the JLP Natural Environment Policies and MP10, or any other policies of the Mendlesham NDP.

Stradbroke NDP does not have a Natural Environment policy. There is not considered to be a conflict between the JLP Natural Environment Policies and any policies of the Stradbroke NDP.

Stowupland NDP policy SNP8 requires development to maintain key views and protect visual qualities of upland landscape as identified on proposals map (9). Policy SNP10 requires development to retain features of the natural environment and create new features that reflect the characteristics of the locality. There is not considered to be a conflict between the JLP Natural Environment Policies and policy SNP8 and SNP10 or any other policies of the Stowupland NDP.

Thurston NDP policy 9 requires new development to be designed to minimise impact upon landscape and the high quality rural landscape, ensuring valued local features, as identified in Thurston Parish Environment, Landscape Green and Open spaces Report (2018), are protected where possible. Policy 11 seeks the incorporation of design features which will encourage wildlife to thrive into development proposals. Policy 12 requires all new development to have regard to guidance from the Institute of Lighting Professionals to ensure appropriate sensitive use of lighting is proposed. There is not considered to be a conflict between the JLP Natural Environment Policies and policies 9, 11 and 12, or any other policies of the Thurston NDP.

Consultation feedback

As part of developing the Joint Local Plan we have consulted at the following main stages:

Regulation 18 Issues and options (August 2017) – which identified a range of issues and potential options for how we should plan for Babergh and Mid Suffolk Districts

Comments received as part of the consultation stages have been taken into account in the preparation of the Joint Local Plan. The main issues raised in the Reg 18 consultation, together with our response, is set out in the accompanying **Consultation Statement**.

The Issues and Options Draft Joint Local Plan 2017 included Natural Environment policies. The representations for 2017 largely covered the following point –

- Need to ensure we not only protect but also enhance existing habitats and species across the districts.
- Proposals minimise impacts on landscape but does not enhance as is required by NPPF.
- Give greater weight to Neighbourhood Plans, Village Design Statements and Local List.

As a result of this feedback, the Natural Environment Policies in the regulation 18 plans were drafted with these views considered. The other points raised could not be addressed, either because they covered a matter that did not relate to Natural Environment because they dealt with detailed matters that are not appropriate to include in a policy, or because they ran contrary to national policy.

Regulation 18 The Preferred Options Draft Joint Local Plan (September 2019) included Natural Environment policies. The representations for 2019 largely covered the following point –

- Need to ensure we not only protect but also enhance existing.
- Reference to conserving and restoring Priority Habitats is omitted.
- Need to include ancient and veteran trees as set out in NPPF.
- No requirement for approval of comprehensive landscape schemes as part of application.

- Not enough reference to how Project Areas to both AONBs will be treated when applications are submitted.

As a result of this feedback, the Natural Environment Policies in the regulation 19 plans were drafted with these views considered. The other points raised could not be addressed, either because they covered a matter that did not relate to Natural Environment, because they dealt with detailed matters that are not appropriate to include in a policy, or because they ran contrary to national policy.

Pre-submission Regulation 19 draft Joint Local Plan (November 2020) included Natural Environment policies. The representations for 2020 largely covered the following points –

- Improve ecological baseline and availability of data to inform Local Plan
- Clarify RAMS
- Biodiversity Net Gain to be targeted locally relevant
- Development impact upon Ipswich and Air Quality should be considered
- Reference National/International standards
- Biodiversity offsetting should be exceptional
- Measures should be identified in the LVIA
- Protect AONB project areas

LOCAL PLAN POLICY APPROACH

Conclusion

This topic paper outlines and explains how the Natural Environment policies of the draft Joint Local Plan has evolved from the Council's evidence base, national planning policy and guidance and consultation comments received from the second Reg 18 and Reg 19 Draft Joint Local Plan. The document is intended to provide background information and does not in itself contain any policies or site allocations.

By considering and reflecting national policy and guidance, the local context and public opinion, the Natural Environment Policies provides strong development management policies, which will help direct development towards the most sustainable locations in the districts. The policy will enable the Council to accommodate all of its objectively assessed development needs safely without negatively impacting upon the Natural Environment.