

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

	Groups	Likely Impact (positive/negative/no impact)	Reason for your decision
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.