

## **WPC response to the Draft Recreation Disturbance Avoidance & Mitigation Strategy (RAMS)**

Our first point is in relation to the mechanism of how the Parish Council can respond to ESC consultations. We note that the most recent consultations have asked for comments either through “inserting” comments onto the ESC document or via “interactive maps”.

Inserting comments is not a suitable way of responding when doing so on behalf of a group such as a Parish Council. The responses must be discussed and approved by all members of the PC and this is simply not feasible if inserting comments into an existing text.

Waldringfield Parish Council will therefore continue to respond in separate response documents as below.

WPC is very pleased to see that Waldringfield is within Zone B, given its very sensitive location in relation to the Deben SPA and RAMSAR sites as well as its proximity to a number of SSSIs within easy travelling distance.

We understand the concept of obtaining funding from developers to help offset the harm that their development will do to the protected and sensitive sites. However we feel very strongly that this should not be the magic bullet which allows development in an inappropriate area. In all cases the first option should be to avoid harm rather than to introduce extraneous measures which try to mitigate the harm. We would also suggest that greater emphasis should be placed on securing developer contributions over a much longer period. For example if funds are paid to cover the cost of a warden on a particular protected site we say that this should be sufficient for more than just 4 or 5 years as the potential for harm will continue beyond that time scale. We also feel strongly that mitigation measures do not address problems such as the pressures on popular recreational areas such as Waldringfield.

The Parish Council is concerned that the draft RAMS makes little or no reference to the Government Planning White Paper which lays out the intention to remove the individual environmental and habitat assessments and replace them with a single sustainability assessment. We think that the RAMS draft should be amended to take account of these proposed changes and to indicate how these changes may affect the implementation of the RAMS.

Similarly there is little or no reference to the end of the Brexit transition period in three weeks time when the European Directives no longer apply. The RAMS document doesn't appear to contain any contingency plans or indication of how ESC is preparing for these imminent statutory changes. The document does not refer to the legal framework which will take the place of the EU directives.