Babergh and Mid Suffolk District Councils

Biodiversity and Trees Supplementary Planning Document Consultation

The Councils are inviting comments on their Biodiversity and Trees Supplementary Planning Document (SPD) for five weeks from Wednesday 15th May until 4pm on Wednesday 19th June 2024.

The Babergh and Mid Suffolk Joint Local Plan Part 1 2018-2037 Development Plan Document (DPD) was adopted by the Councils in November 2023. The purpose of this SPD is to supplement the relevant policies in the Joint Local Plan (JLP), by providing supplementary information to further explain the policies on biodiversity, protected species and habitats, and trees to inform the preparation, consideration and determination of planning applications, to ensure biodiversity enhancement is provided through the planning process.

The Councils encourage responses to be made via the online consultation portal at https://baberghmidsuffolk.oc2.uk/, and further information and guidance on the consultation can be found at:

www.babergh.gov.uk/supplementary-planning-documents-consultation
www.midsuffolk.gov.uk/supplementary-planning-documents-consultation

Please state whether you are commenting on the document overall, a particular section and/or which paragraph(s) you are commenting on in your response.

For the Biodiversity and Trees SPD, the Councils would particularly welcome views on the following matters:

- The overall scope and content of the SPD.
- Section 4 on the approach to biodiversity net gain.
- Section 5 on the approach to what the Councils expect in developments.
- Section 5.10 on the approach to trees in development.

Babergh and Mid Suffolk District Councils

Biodiversity and Trees
Supplementary Planning Document

Consultation Version

May 2024

Babergh and Mid Suffolk District Councils
Biodiversity and Trees Supplementary Planning Document

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1. Introduction

1.1 Biodiversity is the collective term for the variety of life on earth in all its forms (including human, plants, fungi, protozoa and animal species) and their interactions. It is responsible for the food, water, weather and provision of natural resources including the air that we breath. Without a healthy biodiversity, the processes that support all life forms cannot be sustained. There is therefore a responsibility to protect biodiversity for the current and future generations. The State of Nature Report (2019) demonstrated that the abundance and distribution of the UK's species has, on average, continued to decline since 1970, and the rate of decline appears to be increasing. Intensive agriculture, climate change, non-native invasive species and land-use changes have all been drivers of biodiversity decline.

1.2 Consequently, there is now an international agreement to protect a third of the planet for nature by 2030 in a landmark deal aimed at safeguarding biodiversity. The agreement reached at the COP15 UN biodiversity summit include commitments that will:

- Maintain, enhance and restore ecosystem, including halting species extinction and maintaining genetic diversity;
- 'Sustainable use' of biodiversity – essentially ensuring that species and habitats can provide the services they provide for humanity, such as food and clean water;
- Ensure that the benefits of resources from nature, like medicines that come from plants, are shared fairly and equally and that indigenous peoples' rights are protected; and
- Pay for and put more resources into biodiversity, ensuring that money and conservation efforts get to where they are needed.

1.3 Babergh and Mid Suffolk Districts (hereafter referred to as '**the Districts**') support a variety of wildlife rich habitats, including ancient woodland, lowland acid grasslands and heathlands, lowland fens, ponds and rivers. This wide range of habitat also supports a wide range of protected and Priority species, including otters, brown long-eared bat, stag beetles, water voles and the great crested newt.

1.4 The causes of biodiversity loss are numerous. For planning considerations, planning policies and new developments have the potential to impact both positively and negatively on biodiversity.

1.5 Therefore, the consideration of biodiversity enhancement, mitigation and protection is a vital element of the development process. The purpose of this Supplementary Planning Document (SPD) is to explain the context of legislation, national policy and Joint Local Plan (JLP) policies to ensure biodiversity enhancement is provided through the planning process. The

SPD provides supporting information to further explain policies on biodiversity, protected species and habitats, and trees within the JLP to inform the preparation, consideration and determination of planning applications.

1.6 This guidance should be read alongside other Supplementary Planning Documents being produced, including the Wellbeing and Health SPD and the Design: Local Design Codes SPD.

2. Policy, guidance, legislation and scope of this document

2.1 The National Planning Policy Framework (2023) (NPPF, paragraph 180) sets out that *planning policies and decisions should contribute to and enhance the natural and local environment by:*

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).

2.2 In addition, the NPPF (paragraph 185) sets out specific requirements for development plans to *identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks* ... and to *promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*

2.3 With regard to determining planning applications, the NPPF (paragraph 180) requires that local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

2.4 The Babergh and Mid Suffolk Joint Local Plan (JLP) Part 1 Development Plan Document (DPD) 2018-2037 (November 2023) contains a number of policies to deliver this, namely:

- SP09 – Enhancement and Management of the Environment
- SP10 – Climate Change
- LP16 – Biodiversity and Geodiversity
- LP24 – Design and Residential Amenity [(2c) – protect and retain important natural features including trees or hedgerows].

2.5 The Development Plan for Babergh and Mid Suffolk Districts also includes many Neighbourhood Plans, which can contain local policy and supporting text on matters including biodiversity and trees. Protecting and enhancing biodiversity is just as important at the local, as at a county and national level and this should be recognised in Neighbourhood and Parish Plans. Biodiversity should also be recognised as an important component of the green infrastructure of the local area, along with footpaths, allotments and playing fields.

2.6 Legislation runs alongside the planning process, offering different levels of protection to various habitats and species. Protected habitats and species therefore must be considered throughout developments. The legislation that protects and enhances biodiversity is crucial for maintaining sites of existing wildlife. These include international, national and local policy with links provided below, and further commentary on each provided in Appendix 2:

Environment Act 2021 – establishing requirement for 10% biodiversity net gain, production of a Local Nature Recovery Strategy and strengthening the biodiversity duty for public bodies to conserve and enhance biodiversity.
Conservation of Habitats and Species Regulations 2017 (as amended)
The Wildlife and Countryside Act 1981 (as amended)
The Hedgerow Regulations 1997
Protection of Badgers Act 1992
Countryside and Rights of Way Act 2000
Natural Environment and Rural Communities Act 2006
Biodiversity and Geological Conservation: Circular 06/2005

2.7 A number of other strategies are also detailed in Appendix 2.

2.8 The specific objectives for this document are:

2.8.1 To explain the terminology associated with biodiversity conservation to assist applicants' understanding of the importance placed on biodiversity within the wider environment of Babergh and Mid Suffolk Districts.

2.8.2 To be clear on the ways in which development proposals in Babergh and Mid Suffolk Districts are required to meet the requirements of the NPPF with regard to biodiversity and trees.

2.8.3 To assist the speed of determining planning applications by informing applicants of the level of information expected to accompany planning applications.

2.8.4 To encourage applicants to protect, conserve and restore/enhance locally relevant natural habitats and ecological features on their sites and to create new habitats, as part of a high-quality design.

3. Designated areas (including Suffolk Coast RAMS)

3.1 The strategic policy context for the enhancement and management of the environment is contained in the Babergh and Mid Suffolk Joint Local Plan Policy SP09.

3.2 Policy SP09 states that:

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 Avoidance and 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.*

3.3 The Districts of Babergh and Mid Suffolk are rich in areas designated for their importance to the natural environment and wildlife, and together with ancient and veteran trees are a significant biodiversity resource. These designated sites include the following:

- **Special Protection Areas (SPAs)**
  SPAs are areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within EU countries. The Stour and Orwell Estuaries SPA straddles the eastern part of the Essex/Suffolk border and include extensive mudflats, low cliffs, saltmarsh and small areas of vegetated shingle on the lower reaches.

- **Special Areas of Conservation (SACs)**
  SACs are areas designated to protect habitat types that are in danger of disappearance, have a small natural range, or are highly characteristic of the region; and to protect species that are endangered, vulnerable, rare, or endemic. This includes Waveney and Little Ouse Valley Fens SAC on the Suffolk/Norfolk border.

- **Ramsar Sites (Wetlands of International Importance)**
  Ramsar Sites are designated to protect the biological and physical features of wetlands, especially for waterfowl habitats. For example, the Stour and Orwell Estuaries Ramsar site is important due to the extent and diversity of saltmarsh and which supports seven species of nationally scare plants. Ramsar sites often overlap with SACs and SPAs and UK planning policy determines that they should be accorded the same importance when developments are proposed.

3.4 There are also a number of Sites of Special Scientific Interest (SSSI) and Local Nature Reserves (LNR) designated in the Districts, which are detailed in Appendix 6.

3.5 In addition, County Wildlife Sites (CWSs) are implicitly recognised by the NPPF as having a fundamental role to play in meeting overall national biodiversity targets. CWSs are not protected by legislation, but their importance is recognised when considering planning applications.

3.6 **Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS)**

3.6.1 The coast, heaths and estuaries of Suffolk are internationally recognised wildlife assets. They include areas designated as Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites (hereafter referred to as ‘Habitats sites’). These habitats and the species they hold are protected by UK legislation and the international Ramsar Convention 1971.

3.6.2 New residential development brings new residents and visitors to the local area, and if those people use the Habitats sites for recreation, which

evidence suggests is likely, then pressure is increased on those Habitats sites. Assessing, avoiding and managing that recreation pressure is therefore an important part of planning for growth.

3.6.3 The Local Plan Habitat Regulations Assessments (HRAs) for Babergh District Council, Ipswich Borough 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 Habitats sites through increased recreational use by the additional residents.

3.6.4 To address this, Babergh District Council, East Suffolk Council (formally Suffolk Coastal District Council and Waveney District Council), Ipswich Borough Council, and Mid Suffolk District Council commissioned a Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). This strategy set out a tariff-based approach to mitigating the impact of recreational disturbance on Habitats sites resulting from increased residential development across the Local Authority areas. The Suffolk Coast RAMS facilitates development, whilst at the same time adequately protecting Habitats sites from harm.

3.6.5 The Habitats sites likely to be affected by development in Babergh and Mid Suffolk Districts within the Suffolk Coast RAMS are:

- Deben Estuary SPA and Ramsar site;
- Stour and Orwell SPA and Ramsar site;
- Minsmere and Walberswick Heaths and Marshes SPA and Ramsar site; and
- Sandlings SPA.

3.6.6 Whilst Minsmere and Walberswick Heaths and Marshes, and the Sandlings are not within the Districts, the impact of any development in the Districts could impact on these protected sites.

3.6.7 Where a Habitats site could be affected by a plan or project then a Habitats Regulations Assessment (HRA) screening must be undertaken. If this cannot rule out any possible likely significant effect on the Habitats site, either alone or in combination with other plans and projects, without mitigation, then an Appropriate Assessment must be undertaken. The Appropriate Assessment identifies the interest features of the site (such as birds, plants or coastal habitats), how they could be harmed, and assesses whether the proposed plan or project could have an adverse effect on integrity of the Habitats site (either alone or in combination with other plans and projects), and how this could be mitigated.

3.6.8 Zones of Influence (ZoI) are areas from within which it is deemed there will be likely significant effects arising from additional residents living within the zone and travelling to Habitat sites for recreation. This zone determines where new development may result in changes in recreation and therefore where mitigation will be necessary. Each Habitats site currently has a Zone of Influence of 13km.

3.6.9 Two separate tariff zones are identified:

Zone A – reflects the zone of influence to the Stour and Orwell Special Protection Area (SPA) and Ramsar and the Deben SPA and Ramsar; and
Zone B – relates to all the relevant Habitats sites apart from the Stour and Orwell.

Please note that it is only Zone A that is applicable to Babergh and Mid Suffolk Districts.

3.6.10 The most recent tariff for each new residential dwelling built in each zone is set out on the Councils' websites. These are indexed linked from the relevant base date. The per dwelling tariffs may be subject to change throughout the lifetime of the Strategy, as housing figures are reviewed again over time, and in response to more detailed understanding of costs, and as measures are implemented and monitored for effectiveness. Any revisions to the tariff will be published on the Councils' websites.

3.6.11 It should also be noted that some residential schemes, particularly those located close to a Habitats site boundary or large-scale developments, are likely to need to provide additional mitigation measures (in addition to the tariff) such as Suitable Alternative Natural Green Space (SANGS) or green infrastructure measures such as enhanced walking routes and connections to the Public Right of Way network. This would need to be assessed through a project level Habitats Regulations Assessment (including Appropriate Assessment).

Types of development this applies to

3.6.12 The requirements apply to all new residential developments where there is a net increase in dwelling numbers. This includes, for example, the conversion of existing large townhouses into smaller flats, or the change of use of other buildings to dwellings. It also includes new tourist accommodation. It excludes replacement dwellings and extensions to existing dwellings (where there is no net gain in dwelling numbers).

3.6.13 Certain restricted development types may be excluded. These include nursing homes, where the residents will be those in need of daily nursing care and therefore unable to undertake outdoor recreation. Residential

annexes are also excluded, as they do not result in independent dwellings. The SPD does not cover potential effects arising from non-residential development, employment growth or infrastructure improvements. Other projects that may cause recreational disturbance at Habitats sites will need to undertake their own Habitats Regulations Assessments.

Types of application this applies to

3.6.14 The tariff applies to all full applications, outline applications, permitted development and the technical consent stage (the second part to permissions in principle).

3.6.15 RAMS will also apply to development subject to a prior approval application under the General Permitted Development Order (GPDO) allowing for the change of use of some buildings and land to Class C3 (dwelling houses).

3.6.16 If a planning permission has expired and the applicant was previously not required to make a RAMS contribution, RAMS may be required on a resubmission (where it falls within the ZoI and one of the application types above).

How the tariff should be paid

3.6.17 If, during the application process an applicant has been advised that a Recreational Disturbance Avoidance and Mitigation Strategy contribution is required, the RAMS Payment Form is to be completed. Payment must be submitted before a decision is issued. Further advice can be sought from the Planning teams for the requirements of a particular application or as part of the pre-application process.

3.6.18 Further detail on mitigation measures is identified with the RAMS technical report. Projects will be brought forward in line with these measures and expenditure will be reported within the Councils' Infrastructure Funding Statements.

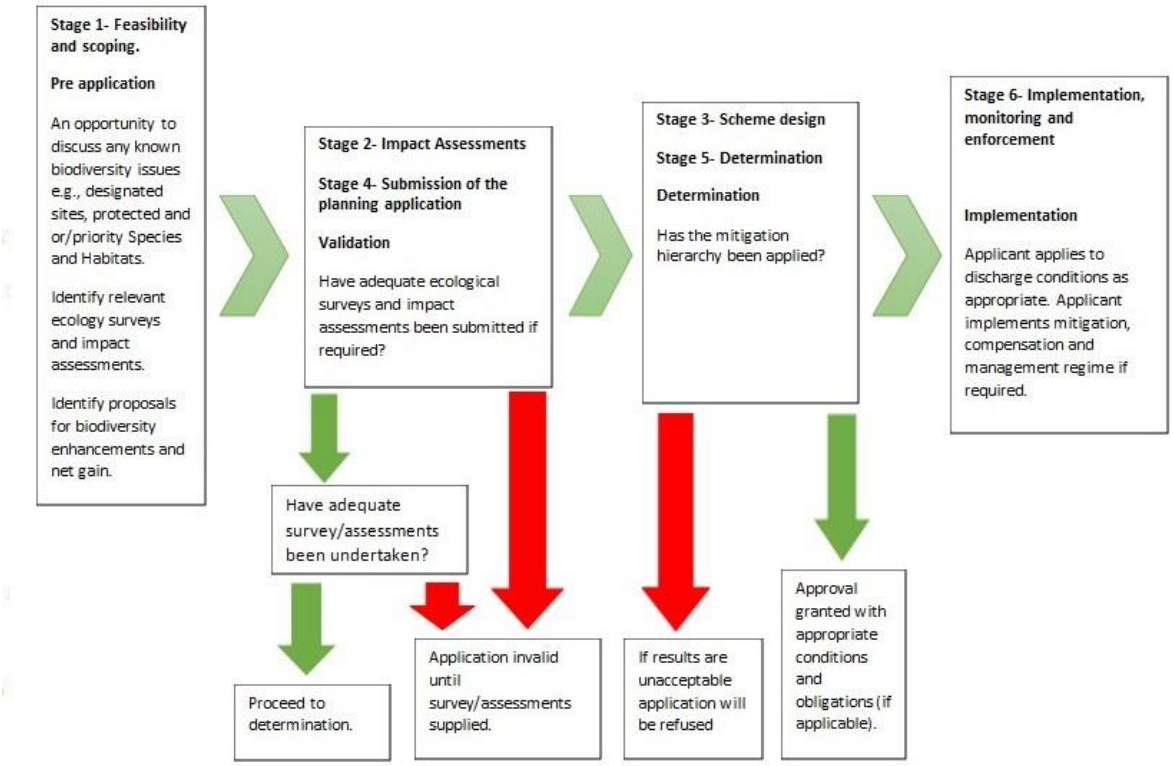
3.7 Permitted Development

3.7.1 These types of developments which do not require a specific grant of planning permission, including new agricultural buildings, larger household extensions and telecommunication systems. These arrangements have been expanded to cover other changes of use including, shops or offices to residential use, and the conversion of agricultural buildings for commercial or residential use.

3.7.2 **These types of development must take account of Protected Habitats and Priority species.**

3.7.3 Permitted development requires compliance with paragraphs 75 to 78 of the Conservation of Species and Habitats Regulations 2017 (as amended), when exercising functions relating to permitted development, such as the grant of prior approval.

4. Biodiversity Mitigation Hierarchy and Biodiversity Net Gain



4.1 Policy SP09 (3) sets out that *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.*

4.2 Policy SP09 (4) sets out that *through **biodiversity net gain,** all development will be required to protect and enhance biodiversity ensuring the measures are resilient to climate change.*

4.3 Policy LP16 (1) states that *all development must follow the biodiversity mitigation hierarchy.*

4.4 The mitigation hierarchy is explained in the Government's Planning Practice Guidance (PPG) for the Natural Environment and below:

a) **Avoidance**: The first aim is to prevent adverse effects through good design. This can include alternative design choices, alterations to site layout, or selecting sites where biodiversity harm is minimised.

b) **Mitigation**: When avoidance is not possible, efforts should focus on mitigating negative impacts. This might involve measures to reduce harm during or after the project. Mitigation should be part of the development proposal and can be imposed as conditions.

c) **Compensation**: Compensation should only be used as a last resort when avoidance and mitigation are not sufficient. It addresses residual impact that cannot be avoided or mitigated. The extent and timing of compensation should consider the quality and risks associated with creating new habitats or restoring existing ones. Specific legal requirements apply to compensation, especially concerning designated sites.

4.5 While following the hierarchy, development proposals should explore opportunities to enhance or create benefits for wildlife. This should be considered in addition to the avoidance, mitigation, and compensation measures to optimise the overall impact on biodiversity.

4.6 The commencement for biodiversity net gain (BNG) as set out in the Environment Act 2021 is subject to secondary legislation made by the Secretary of State on 29th November 2023, which provides the detail for the new biodiversity net gain framework. There are six statutory instruments which become law in February 2024.

What is required to meet the Councils' BNG requirements?

4.7 The Government has published understanding biodiversity net gain guidance on their website so that the impacts on biodiversity interests can be properly assessed using the statutory (official) biodiversity metric calculation tool.

4.8 Applicants are required to submit an Ecological Report to the Councils, clearly: showing what is there, how it will be affected by the development, how the development is compatible with policy, how any negative impacts will be avoided, mitigated or compensated so that a measurable net gain to biodiversity can be demonstrated.

4.9 This will also include the:

- **Identification of all habitat types present at the site** – a short description of the habitat will be required for the relevant Council to confirm the habitat type;
- **The Area** – survey material showing the location and area (ha) covered by each habitat type. This should be provided as a GIS layer to enable verification; and
- **A description of the condition of each habitat type** – this should be assessed using the condition assessment criteria as outlined in the Natural England Biodiversity Metric.

4.10 An impact assessment for ecology will be carried out, which will inform the BNG to be delivered. It is essential that the BNG is recognised as a distinct

process in itself and does not replace habitat assessments and mitigation required on development sites regarding protected sites, species and habitats.

4.11 There are four key stages of an ecological assessment:

- Stage 1 – Survey and assessment.
- Stage 2 – Identify irreplaceable habitats and national and international designated sites, non-statutory designated sites and priority habitats.
- Stage 3 – Create a baseline BNG calculation for development.
- Stage 4 – Apply the biodiversity mitigation hierarchy.

How will the Councils assess the BNG calculation?

4.12 The Councils will review and verify the baseline calculations. This means we will recognise any habitat degradation that has taken place since 30th January 2020 to take the earlier habitat state as the baseline for the purposes of BNG. Aerial imagery or data sets from that time will be used to support our assessment. For example, if a grassland site were strimmed or ploughed in July, we will be able to seek compensation for the habitat as it was in June, rather than the degraded habitat present in July.

4.13 The BNG report will include habitat mapping that clearly sets out existing and proposed losses together with the proposed biodiversity gain, to meet the minimum 10% BNG requirement.

4.14 It is recognised that on some developments the minimum 10% BNG requirement may be exceeded, and the Councils would encourage applicants to deliver at least 20% BNG where possible, for the reasons set out below.

4.15 The environmental ambitions agreed by the Councils are clear, that everything must be done that is possible to protect and enhance the precious habitats, nature rich landscapes, wildlife and species that are under huge pressure from pollution, habitat loss and climate change.

4.16 Leading wildlife organisations published their *State of Nature* report on the UK's current biodiversity in 2023, and this shows that nature is continuing to decline at an alarming rate, in one of the most nature-depleted countries in the World.

4.17 The *State of Nature 2023* report reveals:

- One in six species is now at risk of being lost from Great Britain.
- The wildlife studied has, on average, declined by 19% since monitoring began in 1970.

- The majority of important habitats are in poor condition, though restoration projects have clear benefits for nature, people and adapting to climate change.

4.18 The stark evidence highlighted demands a strong and effective response. There is a desperate need for more, bigger, better-connected places for wildlife, so nature can recover and adapt to climate change, and healthier, happier and more prosperous communities across the Districts can be created.

4.19 Most developments must demonstrate a minimum 10% measurable net gain for biodiversity, in line with the requirements of the Environment Act 2021 and Joint Local Plan policy. However, the Councils believe there is a justification to expect more than this, where possible.

Delivering BNG Off-site

4.20 The Councils request that applicants deliver their BNG requirements on site. However, where the Councils agree that the BNG report demonstrates that the mitigation hierarchy has been followed or there is clear evidence that supports the protection of sensitive habitat or species which would be better located away from the site. Off-site compensation is generally a last resort and will only be considered on a case-by-case basis.

4.21 Any land proposed for use for off-site BNG must be a registered biodiversity gain site. To be eligible for registration on the gain site register, land must be secured by one of two legal mechanisms. The first are planning obligations with local planning authorities (LPAs) under section 106 Town and Country Planning Act 1990 (the Act). The second legal mechanism is conservation covenants.

4.22 The Councils require all applications subject to BNG requirements to conform to this guidance so we can achieve consistency of information on which to carry out decision-making. It should be noted that the granting of permission may be withheld for several reasons including:

- inadequate information is submitted about how the applicant plans to deliver a 10% BNG;
- better BNG outcomes are achievable however, a developer is not willing to engage in making changes to the application, for instance not following the mitigation hierarchy;
- if (even after making the necessary changes to the design following the mitigation hierarchy) biodiversity net gain is not achievable through the proposals on site and the applicant is unwilling to accept necessary pre-commencement conditions relating to biodiversity or sign a legal agreement for Biodiversity Offsetting.

4.23 It should also be noted that we may impose Planning conditions to secure the submission of information and to ensure the developer undertakes particular actions. There is often also a need to use legal agreements as well as or instead of planning conditions because planning conditions:

- are not appropriate for securing financial contributions;
- may not be able to be applied outside of the development site;
- may be limited in their scope in other ways.

The location hierarchy for off-site BNG

4.24 We expect all off-site BNG to be delivered within the Districts and as close to the development site as possible where it is practical to do so.

4.25 Where BNG is demonstrated not to be deliverable onsite, we expect the applicant to prioritise the delivery of BNG off-site in accordance with the following locational hierarchy:

- Within the District (either in Babergh or Mid Suffolk) in which the development is proposed.
- Within either District.
- Within the wider Suffolk Local Nature Recovery Strategy Area.
- Within a neighbouring Local Nature Recovery Strategy Area.

4.26 Applicants relying on delivery of off-site BNG will be required to demonstrate they have used reasonable endeavours to secure that gain in the most sequentially preferable location as set out in the above hierarchy, before moving onto the next most preferable location. Ecological justification, including submission of supporting evidence, will be required to demonstrate where provision of BNG is not practicable in accordance with the above hierarchy.

4.27 Only where it can be demonstrated that there is no feasible possibility of delivering compensation within the locational hierarchy, will the purchase of national credits will be considered an appropriate means of delivering BNG.

4.28 The Local Nature Recovery Strategy (LNRS), which is being led by Suffolk and Norfolk County Councils as responsible bodies, will be used to inform how and where BNG should be delivered, i.e., which habitats are appropriate in what locations. In particular, the LNRS will be used to target offsite BNG so that it contributes to the Nature Recovery Network and the LNRS can be used to determine the ‘strategic significance’ score that is part of the Biodiversity Metric scoring approach. The ‘strategic significance’ score is a landscape scale factor, which gives additional unit value to

habitats that are located in preferred locations for biodiversity and other environmental objectives. The LNRS is expected to be published in 2025.

4.29 In line with recommendations from the Wildlife Trusts, in the interim period a matrix for scoring BNG delivery sites has been developed alongside mapping to provide a consistent and defensible approach to determining the appropriateness of such sites.

4.30 Joint Local Plan Policy LP16 sets out the detailed considerations on biodiversity to be taken into account through the development management process, noting the secondary legislation and the Government's Planning Practice Guidance.

Biodiversity measures in householder applications

4.31 In the case of householder applications, the Councils would encourage biodiversity enhancements to be created, and it recognised that this is different to the requirements for BNG as householder applications are exempt.

4.32 The types of enhancements set out below are relatively straightforward, they should be an integral aspect of the application and designed sensitively with longevity in mind. The Councils encourage as many of the following measures as possible and practical to be incorporated into development:

- Integral bat boxes.
- Integral bird boxes / bricks as opposed to generalist bird boxes, and these should be tailed to priority species such as House Sparrow, Starling, Swift and others (see Appendix 7 for the full list of Priority species).
- Integral bee bricks.
- Green roofs / walls or Brown / "Living" roofs. These should support diverse habitats. Sedum is not considered appropriate as it is a monoculture. For more information see: Green Roof Code.
- Hedgehog friendly fencing.

4.33 In some instances, timber may suffice (for example in the case of a timber shed or timber boxes. The Councils request that this information is submitted upfront in accordance with Local Validation List, and this would also mean that costs associated with discharging of conditions would be minimised.

4.34 Biodiversity enhancement measures proposed for householder developments, will be secured via condition.

5. What the Councils expect in developments

5.1 Design approach

Space for nature and to enable nature recovery are two components that should be designed into any development at the earliest possible stage. Along with an assessment of the site constraints, such as landscape sensitivities, key landscape features such as trees and hedges, and areas of flood risk, creating space for nature should be clearly shown in site masterplans, or through the Design and Access Statement supporting any planning application. This is essential to work toward achieving the Councils' minimum requirement of 10% BNG on all new developments.

5.1.1 Over-arching principles include following the biodiversity mitigation hierarchy in the first instance and where BNG is necessary, securing a minimum requirement of 10%, and the Councils would encourage delivery of 20% where possible.

5.2 Pre-application stage

5.2.1 There are many advantages to seeking pre-application advice at an early stage in the preparation of development proposals, particularly for ecology and BNG as required by the Joint Local Plan (Policies SP09 and LP16), read in conjunction with secondary legislation and the Government's Planning Practice Guidance (PPG). This frontloads the process and avoids risks of delays and additional costs on submission, by providing the developers and their agents with clarity on the scope of information that will be expected to enable the application to be determined.

5.2.2 Where there is a predictable impact on biodiversity and insufficient ecological information is submitted to support determination, the Councils are likely to either not validate or refuse an application, unless exemptions set out in secondary legislation apply.

5.2.3 Developers wishing to seek substantive advice on recreational pressure impacts and mitigation relating to Sites of Special Scientific Interest should be directed to Natural England's Discretionary Advice Service.

5.3 Biodiversity Validation requirements

5.3.1 Where ecology reports recommend further surveys for protected species, submission of the results and full details of mitigation and compensation is now a validation requirement.

Further advice on how to integrate biodiversity conservation into the planning process

5.3.2 Advice is available from Natural England, and this must be considered within the process together with Standing advice on ancient woodland, ancient trees and veteran trees.

5.3.3 There is ecological guidance available on the Babergh District Council and Mid Suffolk District Council websites providing information dealing with the impact details of construction and protected species.

5.3.4 British Standard on Biodiversity – A Code of Practice for Planning and Development BS42020:2013. This British Standard relates to how biodiversity, protected species and habitats must be considered in a planning context. It provides clear guidance and recommendations to ecological consultants, planning applicants and planning authorities, which ensure that ecological considerations are given the appropriate weight at each stage of the planning process and are sufficiently informed by high quality ecological survey and assessments.

5.4 Existing biodiversity information

5.4.1 Biodiversity baseline information from the Suffolk Biodiversity Information Service (SBIS) is needed within all ecological reports, to identify the presence of designated sites and existing records of habitats and species that could be affected by development. Data search requests should be for a minimum 1km buffer from the red line boundary for protected and Priority species and at least 2km for all designated sites. Note for all residential development, the zone of influence for the Suffolk Coast RAMS needs to be checked as this extends a considerable distance from Habitats sites (13km). While older data may be less relevant in some cases, it may provide the only baseline available for a site and so should not be discounted.

5.4.2 An absence of records does not mean a record of absence and ecological consultants need to use their professional judgment to ensure that biodiversity features are not overlooked. Survey and assessment of all species likely to be present on and adjacent to the development site and any which could be affected indirectly should be covered.

5.4.3 Provision of this data within submitted ecological reports needs to be presented in accordance with the terms and conditions of SBIS and any sensitive records should only be shown at 10km resolution.

5.4.4 The consultant ecologist should also determine whether the development site falls within a Site of Special Scientific Interest Impact Risk Zone, as shown on the Multi-Agency Geographic Information for the Countryside

map, which would indicate that the development could result in indirect impacts that require consultation with Natural England.

5.4.5 The following provide guiding principles the Councils will typically look to secure in development to ensure there is space for nature, and that important habitats and species and conserved and enhanced.

Local information sources such as Suffolk Biodiversity Information Service should be consulted to reference Biodiversity Action Plans for particular Priority Species and Priority Habitats in Suffolk.

5.5 Determination of planning applications

5.5.1 In line with BS42020:2013, applicants must ensure that relevant planning applications are supported by adequate ecological information, using up to date desk studies and site assessment to inform survey methodologies sufficient in scope to allow the impact of a proposal to be appropriately assessed. The Councils would encourage householders and developers of small sites, to submit this information where there may be unexpected risks of impacts to habitats and species.

5.5.2 A Preliminary Ecological Assessment is often carried out by ecologists as an initial means of recording the habitats and condition of a development site and predicting the likely ecological constraints and impacts that might arise from its development.

5.5.3 Preliminary Ecological Assessment Reports are valuable documents that should be commissioned at the earliest stages of design, and their results should influence the layout and form of the proposals. Identifying important ecological resources at the outset and avoiding impacts on them will limit the loss of biodiversity and reduce the need for mitigation and compensation measures. In many cases these reports will include recommendations for further survey, particularly in relation to protected and Priority species.

5.5.4 All surveys must be carried out in accordance with published standards and best practice guidance, as appropriate to the information they are expected to generate. To ensure the acceptability of impact assessment, any deviations from best practice should be explained and justified.

5.5.5 Pre-development biodiversity value must be calculated before any site clearance or other habitat management work has been undertaken, by the applicants or anybody else. However, if this is known to have happened, the condition of the site on or after 30th January 2020 will be taken as the habitat baseline stated in Schedule 14 Part 1 paragraph 6 of the Environment Act 2021. This is consistent with existing good practice guidelines for ecological

assessment, including CIEEM and BREEAM guidelines. Where previous surveys are not available, this will be established through SBIS records and habitat areas identified through aerial photographs. Where habitat conditions are not known, then a precautionary approach will be applied.

5.5.6 Where additional information is required post validation to meet legal requirements e.g. protected species surveys and mitigation, this must be provided prior to determination to support a lawful decision. It is considered unlawful to secure this information by condition as the Councils need certainty of likely impacts on protected species and that mitigation measures are appropriate and deliverable.

5.5.7 Planning conditions may include requirements for the following:

- Ecology report recommendations (mitigation, compensation and enhancement measures).
- Construction Environment Management Plans including Biodiversity.
- Wildlife sensitive lighting plans.
- Environmental Clerk of Works for large scale development sites (where required).
- Landscape and Environment Management Plan.
- Biodiversity Net Gain Plan (BNG habitats).
- Biodiversity Enhancement Strategy (for species).
- Householder Biodiversity Enhancement Measures.

5.6 Habitats Regulations Assessment (HRA)

5.6.1 Where development is proposed close to a Habitats site so construction impacts need mitigation (also water quality and water quantity (see policy in JLP) it may result in significant impacts which need to be assessed. Some types of development e.g. residential, are predicted to result in recreational disturbance on Habitats sites at a distance from the development site.

5.6.2 To support the Councils in meeting policy requirements policy requirements and their legal duties under the Conservation of Habitats and Species Regulations 2017 (as amended) – known as the Habitats Regulations – where development is likely to result in a significant effect on a Habitats site, proposals need to be supported by information to support the HRA screening report prepared by the Local Planning Authority. This needs to include the results of any necessary surveys and details of any mitigation measures to avoid adverse effects on the integrity of the site(s) embedded into design of the development.

5.6.3 All of the Councils' HRA Appropriate Assessments will be sent to Natural England for their formal consultation response on their conclusions before any decision can be issued.

5.6.4 The aim of the Habitats Regulations Assessment process is to 'maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest'. The Conservation of Habitats and Species Regulations 2017 (as amended) transposed the European Habitats and Wild Birds Directives into UK law to make them operable from 1st January 2021 when the UK had left the EU. These remain unchanged until amended by Parliament so the requirements for Habitats Regulations Assessment under the Conservation of Habitats and Species Regulations 2017 (as amended) have been retained.

5.6.5 Where a Habitats site could be affected by a plan, such as a Neighbourhood Plan, or any project, such as a new development, then HRA screening must be undertaken by the Council as the competent authority. If this cannot rule out any possible likely significant effect on a Habitats site, either alone or in combination with other plans and projects, prior to the consideration of mitigation measures, then an Appropriate Assessment must then be undertaken. The Appropriate Assessment identifies the interest features of the site (such as birds, plants or habitats), how these could be harmed, assesses whether the proposed plan or project could have an adverse effect on the integrity of the Habitats site (either alone or in-combination), and finally how this could be mitigated to meet the Stage 2 HRA 'integrity' test.

5.6.6 Also see the section on the Suffolk Coast RAMS earlier in this SPD.

5.7 District level licensing for great crested newts

5.7.1 This is a strategic mitigation scheme run by Natural England which includes:

- maps to show where great crested newts are likely to live and the most important areas to conserve;
- target areas for new or restored ponds to compensate for loss of habitat for great crested newts;
- a strategy which includes an impact assessment of the effects of development at a local authority level or larger scale; and
- a developer contributions scheme to fund compensatory habitat.

5.7.2 Natural England collects data on great crested newt populations in the areas covered by their scheme. Using data modelling, they predict where newts live and prepare a great crested newt licensing strategy based on that data.

5.7.3 They use the data to:

- map risk zones showing where great crested newts are likely to live;
- assess the effect of a proposed development on great crested newts in the area; and

- predict suitable habitat areas to target for compensation ponds (known as strategic opportunity areas).

5.7.4 There are three risk zones under the Natural England district level licensing scheme for great crested newts:

- red zones have great crested newt populations of regional, national or international importance – developers cannot use district level licensing in these zones;
- amber zones have great crested newt populations, habitats and dispersal routes – developers can use district level licensing in these zones; and
- green zones have fewer areas with great crested newts – developers can use district level licensing in these zones.

5.7.5 In an amber or green zone, all types of development are suitable for the scheme, including:

- permitted development;
- nationally significant infrastructure projects; and
- phased developments.

5.7.6 If a phased development has used a mitigation licence before, future phases may be able to use district level licensing.

View the great crested newt risk zone maps on Natural England's Open Data Geoportal.

Application process

5.7.7 To join the scheme, developers need to apply for an impact assessment and conservation payment certificate (an IACPC) from Natural England.

5.7.8 If a developer is accepted to join the Natural England Norfolk and Suffolk Great Crested Newt District Level Licensing scheme, they do not need to carry out their own surveys for this European Protected Species or plan and carry out mitigation work.

5.7.9 If a consent for development is issued, developers do not need to meet the Government's Standing Advice for Great Crested Newt. However, the Councils will still require survey and assessment for other protected and Priority species likely to be present and affected by development, together with delivery of any mitigation needing to be secured by a condition of any consent.

5.7.10 Natural England has a District Level Licensing scheme for great crested newt in Norfolk and Suffolk that developers can pay to join for each of their sites, to better protect Great Crested Newt populations as an alternative to conventional site-based survey, licensing and mitigation methods. Full details are available on the relevant pages of the Government District Level Licensing website.

5.7.11 As an alternative to great crested newt surveys and assessment, the use of District Level Licensing provides a year-round option for developers to mitigate predicted impacts on great crested newt and can provide certainty of costs and timescales.

5.7.12 With an agreement in place with Natural England to use District Level Licensing, the Councils only need an Impact Assessment and Conservation Payment Certificate countersigned by Natural England to be submitted with the planning application as evidence of site registration under this strategic mitigation scheme.

5.7.13 Participation in the District Level Licensing scheme does not negate the need for proposals to follow the mitigation hierarchy or deliver measurable net gain. The Councils will still require survey and assessment for other protected and Priority habitats and species likely to be present and affected by development, with any necessary mitigation secured by a condition of any consent.

5.7.14 A precautionary approach to site clearance, under the supervision of a suitably qualified ecologist, will be required for all development supported by Great Crested Newt District Level Licensing, as all protected and Priority species predicted to be on site will need to be moved to a place of safety to avoid reckless actions and prevent wildlife crime. This will include supervision of any habitat works by an Ecological Clerk of Works, who will undertake a fingertip search, and implementation of a Construction Environment Management Plan (Biodiversity).

5.7.15 The Environment Act includes an intention to prepare other Strategic Mitigation Schemes in consultation with stakeholders to support delivery of sustainable development.

5.8 Recreational pressure on Sites of Special Scientific Interest (SSSIs) and County Wildlife Sites (CWSs)

5.8.1 Natural England expects applicants to undertake an assessment of impact of residential development on designated Sites of Special Scientific Interest (SSSIs) and County Wildlife Sites (CWSs) where they have public access.

5.8.2 Impact Risk Zones are an online mapping tool developed by Natural England to make an initial assessment of the potential risks to Sites of Special Scientific Interest posed by development proposals. They define zones around each Site of Special Scientific Interest which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal that could potentially have adverse impacts. Impact Risk Zones can be viewed via the Multi-Agency Geographic Information for the Countryside.

5.9 Biodiversity Design case studies

5.9.1 Joint Local Plan Policy LP24 sets out development management considerations on design and residential amenity. With particular regard to biodiversity Policy LP24 (2c) sets out the need to *protect and retain important natural features including trees or hedgerows during and post construction.*

5.9.2 The following section of this SPD details good practice in the design and implementation of biodiversity measures.

Landscaping	
Landscaping schemes should retain, enhance and increase the most valuable existing semi-natural and priority habitat on site. Hedgerow breakage should be minimised to maintain connectivity, including boundary hedges. Hedgerows should be designed to link up habitats within the boundary, and the wider landscape. For example, native hedgerows with species rich buffers, which provide routes and act as wildlife corridors so species can forage and disperse.	 Example of native mixed hedging
Sustainable Drainage Systems (SuDS) should be designed to benefit biodiversity. Rain Garden Guide https://www.susdrain.org/delivering-suds/	 A SuDS scheme in Needham Market
New semi-natural and priority habitat can be created to offset and compensate for biodiversity loss from a development. This habitat could include native woodland, hedges, scrub, ponds and wildflower meadows. Bespoke species habitats could include creating deadwood habitats and hibernaculum. Further information: Fresh water habitats: Pond creation toolkit. https://www.woodlandtrust.org.uk/plant-trees/advice/ https://hedgelink.org.uk/ https://www.buildingwithnature.org.uk	 Example of a hibernaculum

Ensure a 10m ecological riparian buffer zone is maintained for existing streams and rivers. This helps to protect them from the impact of adjacent land uses. It is also important to ensure existing green infrastructure within and adjacent to the scheme also has appropriate buffers. Developments will need to incorporate a 15m protective buffer to County Wildlife Sites and to ancient woodland. In respect of ancient and veteran trees, a buffer zone is at least a radius of 15 times trunk diameter measured at 1.5m or narrowest point below. Buffers should consist of semi-natural habitat comprising of native plant species.	 A buffer zone between agricultural land and a SSSI in north Suffolk
Wherever appropriate, developments should include the restoration and enhancement of any watercourses on and adjacent to the development site, including naturalisation of any culverted lengths. These measures can also include the removal of any invasive species, such as Himalayan Balsam.	 Water course restoration in Eye

Where there is access to adequate public and private open space (including gardens), appropriate nest boxes should be installed for the benefit of Priority species. Swift bricks and integrated boxes can be used within developments (see Buildings below).	 Example of a bird nest box
Rewilding can also be used to compensate for biodiversity loss on site. However, compensation should only be considered as a last resort. Rewilding can include: Expanding or connecting ancient woodland areas to increase carbon sequestration and allowing wildlife to establish and disperse. Restoring wetlands and introducing beavers to reduce flood risk and store carbon, as well as increasing biodiversity. Reintroducing species such as large herbivores or predators to an area to restore ecosystem functioning. Reducing high populations of grazing animals to allow vegetation and trees to grow.	 20-year old naturally generated woodland in Milden (above), compared to 37-year old planted woodland (below), showing the difference in structure 

Buildings	
Nesting and roosting opportunities for Priority bird species (such as Barn owl and kestrels) should be incorporated into the structure of the building or in the roof space. This should be of priority as the move to low and zero carbon buildings has reduced traditional nesting spaces for birds. Where this is not feasible, the attachment of nest boxes and bat roost boxes to the external walls of new buildings should be considered. The design of these boxes should be appropriate for different Priority species that are being targeted. Further information: Bat Conservation Trust: Putting up bat boxes Swift Conservation: Fitting Swift Nest Places The Barn Owl Trust: Barn Owl nest boxes	 Example of an attached nest box  Example of an integrated bird box
Boundary treatments adjacent to private gardens / residential properties should consist of semi-natural habitat consisting of mixed native scrub, hedgerows or woodland, providing in part habitat for hedgehogs to forage and live. However, suckering and thorny species in native hedgerow adjacent to recreational areas and native hedgerow with suckering species adjacent to allotments are discouraged. If this is not feasible 'wildlife friendly' fencing which has a 15cm gap between the fence and the ground or a 13cm-by-13cm ground level gap in the fence should be incorporated. These gaps will need to be indicated on the landscape/ecological plan. Log piles and hibernacula should be provided to form habitat for insects and	 Example of a wildlife friendly boundary fence

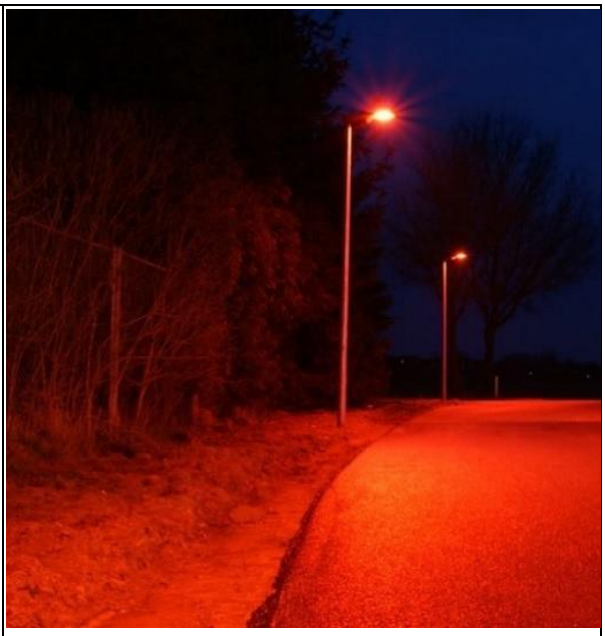
some reptiles, and foraging opportunities for other native bird and mammal species. Further information: Hedgehog Street- Link your garden	
Formal landscape planting schemes, particularly those in urban and suburban areas should consist of a mixture of new and retained native shrubs, trees and plants to help pollinator abundances. Landscaping schemes should comprise of appropriate native species and fruit trees to enhance biodiversity with foraging / habitat opportunities, particularly heritage orchard species from the area. Further information: Apples & Orchards Project | Local heritage fruit varieties in the East of England (applesandorchards.org.uk) https://www.uea.ac.uk/groups-and-centres/orchards-east Royal Horticultural Society RHS- Plants for Pollinators list	 A native tree and shrub planting scheme on council land in Sudbury
Bee bricks can be incorporated into building developments.	 Example of a bee brick

Lighting schemes should follow guidance from the Bat Conservation Trust and ILP (GN08/23). The implementation of a Wildlife Sensitive Lighting Design Scheme should be submitted to demonstrate measures to avoid lighting impacts to foraging / commuting bats, which are likely to be present within the local area of the development site.

Lighting should be considered throughout the development process. It should be minimised where possible, ensuring LED bulbs with warm white (<3000K, ideally <2700K) are used, motion sensors (if required) are used to avoid the amount of 'lit-time', and the appropriate direction of lighting to avoid illuminating ecological features, such as hedgerows and waterbodies.

Artificial lighting should avoid spill onto "dark corridors" such as hedgerow networks, railway embankments, waterways, parkland and woodland edge habitat.

A lighting design plan will need to be submitted and should include specification, number, orientation, dimming and control (timing and sensing) and arrangement for each luminaire and a luxe contour plan if appropriate.



Examples of wildlife friendly lighting

Bat boxes should be provided in new developments, on new buildings. Foraging corridors for bat species should be considered.	 Example of a bat box attached to a new building
Green roofs and living walls: Green roofs can provide benefits for biodiversity, as they can support species of bird and invertebrates by providing low nutrient, well drained habitat. Living walls protect buildings from weathering and temperature fluctuations. They are most useful in an urban setting where they provide green infrastructure provision. Further information: Living roofs	 Example of a living wall
Roads and Streets	
Developers can offset by creating underpasses and green bridges to enable wildlife to disperse and move freely. Further information: Green Bridges- safer travel for wildlife Wildlife Traffic Handbook	 Example of a wildlife underpass

Street trees can be used as natural traffic management, whilst helping to improve local air quality, moderate temperature extremes, reduce surface water run-off, and enhance ecological connectivity. Street trees also help by increasing property value and the well-being of local residents.	 Street trees in Great Cornard
Use SuDS / reedbeds for treatment of surface water runoff. Wildlife friendly kerb stones can also be used to avoid reptile and amphibian mortalities caused by gully pots. Further information: Common Toads and Roads: Guidance for planners and highway engineers in England	 Example of a kerb designed to allow amphibians to bypass gully grating
Biodiverse road verges can be created to support more wildlife. Wildflowers can be planted to create wildflower meadows which will attract higher numbers of pollinators. In some cases, the existing wildflowers present prior to development can be retained by managing open spaces as meadows, rather than as amenity grass.	 A wildflower rich verge in Stowmarket

Further good practice guidance on enhancing biodiversity can be found here:

State of Nature 2023: report on the UK's current biodiversity.

Recovering together: a report of public opinion on the role and importance of nature during and in our recovery from the Coronavirus crisis in England, RSPB, (June 2020).

Hedgehog Street – How many hedgehogs are left? British Hedgehog Preservation Society and The People's Trust for Endangered Species.

Biodiversity in new housing developments: creating wildlife-friendly communities, NHBC (April 2021).

5.10 Trees in development

5.10.1 The planting of trees can enhance the appearance of a development. Trees are amongst the most permanent and significant features in our towns and countryside, and they improve the environmental quality of the environment in a number of ways:

- Planting of trees can enhance the appearance of a development whilst providing rich habitats for a range of wildlife.
- Trees can also provide cooling and shading during summer months and reduce the energy required for air conditioning systems, provide shelter from winds and rain during the winter months, and help reduce rainwater run-off.
- Trees absorb noise and pollution, provide oxygen and moisture, provide privacy and can help stabilise land.
- Retaining existing mature trees within development schemes when possible, demonstrates the protection of the local setting, which combined with new planting proposals, creates significant aesthetic and physical amenity and increased biodiversity.
- Trees help us feel less stressed and more restored. Probably the most well-researched benefit of nature exposure is that it seems to help decrease our stress, rumination, and anxiety.

5.10.2 Ensuring there is sufficient space for new trees in development will be further explained in the Councils' Design SPD to be produced later in 2024. This SPD will set out further detail on accommodating trees in development, providing good practice on retaining trees.

5.10.3 Appendix 4 details information that needs to be submitted with any planning application where there are trees on a site. Further information is available in the Councils' Local Validation Requirements Checklist.

Ancient and veteran trees

5.10.4 Ancient trees are those that have passed beyond maturity and are old in comparison with other trees of the same species. This gives these trees considerable aesthetic and cultural value and can create complex and irreplaceable habitat for a range of species. During the later stages of life, trees are progressively colonised by fungi that change the properties of wood and increasing quantities of dead and dysfunctional woody tissue can accumulate. As a result of this decay and natural occurring change a variety of 'veteran features' can develop, including trunk hollowing, branch cavities, shattered branch ends, loose bark and a range of modified woody tissue.

5.10.5 These features provide a range of habitats many of which are specific to various invertebrates that are dependent on the presence of dead or decaying wood. Different types of decay provide important habitats for these specialised and rare invertebrates, some of which are interdependent with each other and often have limited mobility. The longer these features are in place the greater the diversity of colonising species. The scale, variety, complexity and longevity of these habitats in ancient trees makes them irreplaceable.

5.10.6 Veteran trees are different to ancient trees in that they lack their great age but have developed some of the features and habitats found on their older counterparts, and for this reason are still extremely important.

5.10.7 More information on ancient and veteran trees can be found on the websites of the Woodland Trust and Ancient Tree Forum.

Identifying ancient and veteran trees:

5.10.8 Ancient and veteran trees are given a high level of protection in the planning system, and it is important to distinguish between these and trees that are simply old or mature. Ancient and veteran trees are defined in NPPF (2023) (p. 67) as:

A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees but not all veteran trees are old enough to be classified as ancient.

5.10.9 However, they will have developed characteristics similar to those found in ancient trees and therefore are also important. Very few trees of any species reach the ancient life-stage.

5.10.10 They are described in Government's Planning Practice Guidance (PPG) (Natural Environment / Paragraph: 032) as follows:

Ancient trees are trees in the ancient stage of their life. Veteran trees may not be very old but exhibit decay features such as branch death or hollowing. Trees become ancient or veteran because of their age, size or condition. Not all of these three characteristics are needed to make a tree ancient or veteran as the characteristics will vary from species to species.

5.10.11 For a tree to be considered veteran in the way the term is used in NPPF it needs to be irreplaceable as a habitat, and that is more likely to be the case for trees that are large and old for their species. Mature trees with only a limited range of veteran features and forms of decay that are commonplace and supporting only common invertebrate species are unlikely to qualify as veteran in this understanding of the word.

5.10.12 The Ancient Tree Inventory (ATI) records ancient, veteran and notable trees. It is compiled from information provided by members of the public and only records a proportion of ancient or veteran trees. It can be viewed on an interactive map on the Woodland Trust website. The ATI should be consulted to identify any important features that have already been recorded.

5.10.13 Tree surveys undertaken for development should identify ancient and veteran trees. In some cases, it may be necessary for potential veteran trees to also be surveyed by an experienced entomologist to determine whether they provide exceptional value for dead wood invertebrates.

5.10.14 Features characteristic of ancient and veteran trees include:

- a large girth for the species
- major trunk cavities or progressive hollowing
- naturally forming water pools
- decay holes
- bark loss
- large quantities of dead wood in the canopy
- crevices in the bark, under branches or on the root plate sheltered from direct rainfall
- fungal fruiting bodies
- colonisation from epiphytic plants (plants that grow on other plants)
- an 'old' look
- high aesthetic interest.

5.10.15 A Tree Planting Strategy is being developed by the Councils. Quantifying the spatial extent of canopy cover is one of the first steps in 'measuring to manage' urban forests. It also answers the fundamental questions: 'How much urban forest do our areas have?', 'Where are they?' and 'How have they changed over time?'. Further evaluation and appreciation have been given to canopy cover across the Districts in considering its relationship with other environmental and social indicators. The benefits they provide, ecosystem services, also contribute to natural capital when assigned monetary values. Adding this perspective allows the urban forest to be viewed as an asset, encouraging planners, urban foresters, and residents to consider trees as key components of community planning, sustainability, and resilience.

5.10.16 The Councils' draft Tree Planting Strategy identifies where more trees should be planted, and suitable for planting has been defined as:

1. Not in areas of water, roads, buildings, paths or tracks or under existing canopy.
2. Within 10m of a road (scores higher than over 10m from a road).
3. In an area of high pollution (both NO_2 and PM2.5 levels).
4. In the most highly deprived areas in the District (scores higher).
5. In an area prone to Flooding (scores higher).
6. In an area with poor health outcomes.
7. In an area where Urban Heat Island effects are greatest.

5.11 ***Green Infrastructure to help enhance biodiversity***

5.11.1 A Green Infrastructure (GI) Strategy will also be produced by the Councils and Natural England provides information on what good Green Infrastructure should look like and the benefits it provides:

- Urban landscapes can be rich in wildlife and help to support nature's recovery.

- Significant amounts of wildlife rich habitat exist in local nature reserves, that are often within or close to urban settings.

- These areas provide important green infrastructure for local communities and can support rare as well as common species. Urban areas are particularly important for pollinators and small areas of habitat – and improve people's access to green space, particularly in urban areas.

- Creates active and healthy places: economically poorer communities can have access to good quality natural green or blue spaces close to

where they work, it helps reduce obesity, outdoor activities and activities in outdoor space improves mental health.

- At the local level, GI should maximise health and wellbeing outcomes particularly in deprived areas and for disadvantaged groups.

- Address inequality issues in access to natural greenspace and routes.

- Be managed to deliver indirect benefits such as urban cooling, noise reduction, flood risk management and air quality improvements which can improve health outcomes.

- Should include mapped sources of information which can allow application of appropriate standards to quantify deficits and identify priority locations for health-related GI investment.

- Partnership working between greenspace managers, transport and health professionals and should then form part of successful GI planning and delivery.

- Unsustainable engagement with nature is endangering the prosperity of current and future generations.

- Our economies are embedded in nature and depend on it. Placing accurate economic values on green infrastructure supports sustained investment in nature.

- GI can also play a vital role in improving water quality, for example by introducing vegetation which can help trap, filter out or reduce contaminants released to the environment. The recreational benefits of blue infrastructure are also important aspects of GI.

- Sustainable Drainage Systems or SuDS are a way of managing water using natural processes. SuDS mimic nature in urban environments by holding back rainwater where it falls or letting it soak into the ground, instead of letting it run off hard surfaces like pavements and car parks straight into sewers.

- This approach can enable developments to include green roofs and walls, rain gardens, soakaways, permeable pavements and various other water retention features. These measures are capable of slowing the water flow, bringing rain and greywater into use, creating new habitats, reducing water pollution and enhancing and creating recreational opportunities.

5.11.2 The Councils will however work with Suffolk County Council in the development of the Local Nature Recovery Strategy to ensure the most beneficial positive impacts for nature recovery are secured through biodiversity net gain.

6. What you need to submit with a planning application

6.1 Please refer to the Councils' Local Validation Requirements Checklist.

Appendix 1 – Glossary

Biodiversity: short for biological diversity—means the diversity of life in all its forms—the diversity of species, of genetic variations within one species, and of ecosystems.
Conservation: The management of human use of nature so that it may yield the greatest sustainable benefit to current generations while maintaining its potential to meet the needs and aspirations of future generations.
CGS – County Geology Sites: is a conservation designation for places that are considered to be especially important for the geology they exhibit.
CWS – County Wildlife Sites and the designation of these sites is non-statutory, but recognises the higher value of a site for wildlife. They are designated due to supporting characteristic or threatened species or habitat. They are recognised as having a fundamental role in meeting national biodiversity targets.
Ecosystem: self-regulating communities of plants and animals interacting with each other and with their non-living environment—forests, wetlands, mountains, lakes, rivers, deserts and agricultural landscapes.
Ecosystem services: are processes by which the environment produces benefits useful to people, akin to economic services. Including provision of clean water and air, pollination of crops, mitigation of environmental hazards, pest and disease control and carbon sequestration.
Flora: All of the plants found in a given area.
Fauna: All of the animals found in a given area.
GI – Green Infrastructure: is a term used to describe a strategically planned network of natural and semi-natural areas, which can bring environmental and quality of life benefits for communities.
Habitat: A place or type of site where an organism or population naturally occurs.
Habitat fragmentation: Fragmentation of habitats occur when a continuous has become divided into separate, often isolated small patches interspersed with other habitats, or land uses such as agriculture, housing, transport and industry. Small fragments of habitats can only support small populations of fauna and these are more vulnerable to extinction.
JLP – Joint Local Plan: is Babergh and Mid Suffolk District Councils' Local Plan Development Plan Document for the period 2018-2037. Part 1 was adopted in November 2023.
LNR – Local Nature Reserve: Local authorities can create local nature reserves (LNRs) under the National Parks and Access to the Countryside Act 1949. Town and parish councils can create LNRs if the district council has given them the power to do this.
National Landscapes (formerly AONBs – Areas of Outstanding Natural Beauty): is land protected by the Countryside and Rights of Way Act 2000 (CROW Act). It protects the land to conserve and enhance its natural beauty. The CROW Act sets out the roles and responsibilities that different organisations must follow to manage National Landscapes.
NNR – National Nature Reserve: they were established to protect some of our most important habitats, species and geology, and to provide 'outdoor laboratories' for research.

Ramsar – The Ramsar Convention on wetlands of international importance.
RNR – Roadside Nature Reserve: under the Roadside Nature Reserve Scheme and are individually managed to benefit the plants and animals that live there.
SAC – Special Area of Conservation and are protected areas under the Conservation of Habitats and Species Regulations 2017.
SBIS – Suffolk Biodiversity Information Service – Suffolk's biological data centre with a database of over 5 million records. They collate, manage and share species and site data to inform better decisions and actions to benefit Suffolk's wildlife.
SPA – Special Protection Area and are protected areas for birds in the UK classified under the Wildlife and Countryside Act 1981and Conservation Regulations 2010 and the Conservation of Offshore Marine Habitats and Species Regulations 2017.
SSSI – Site of Special Scientific Interest.

Appendix 2 – Legislation and policy commentary

Environment Act 2021

The Act sets the requirement for any new development to generate Biodiversity Net Gain to make a positive impact and reverse biodiversity loss. The Act also makes provision for the Secretary of State to set up a system of statutory biodiversity credits, which can be bought by developers as a last resort when onsite and local offsite provision of habitat cannot deliver the Biodiversity Net Gain required. It also states Local Nature Recovery Strategies must be produced by a Responsible Authority appointed by the Government, which is Suffolk County Council (SCC). The Local Nature Recovery Strategies are part of delivering the National Nature Recovery Network, aiming to expand and connect areas of existing biodiversity.

The Local Nature Recovery Strategy, which is currently being formed by SCC, and Biodiversity Net Gain.

More about local nature recovery strategies can be found here on the Government's website: Local Nature Recovery Strategy pilots: lessons learned

Conservation of Habitats and Species Regulations (2017)

Details the mechanisms by which conservation of species, plants and sites is implemented in the UK. It also details Habitats sites and lists European Protected Species which are protected under the Regulations and granting of Special Nature Conservation orders.

The Wildlife and Countryside Act 1981 (as amended)

This detail lists of species of flora and fauna which are protected in the UK, and the protection of species in the UK overall, as well as information about protection of species in sites of special scientific interest and nature conservation in the countryside and national parks. Schedules 1,5 and 8 list the species protected by this Act.

The Hedgerow Regulations 1997

Protection of hedgerows meeting criteria of importance from being removed within certain exemptions.

Natural Environment and Rural Communities Act 2006

Under this act, Section 40 requires that:
"public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity".
It is the duty of planning authorities to have regard for biodiversity in so far as it is consistent with the discharging of their normal duties.

Biodiversity and Geological Conservation: Circular 06/2005
This provides guidance on how to apply laws of nature conservation and planning. It covers internationally and nationally designated sites; the conservation of habitats and species outside those sites; the species protected by law; and other duties such as Environmental Impact Assessment (EIA). It can be viewed here.

National Planning Policy Framework (NPPF)
The National Planning Policy Framework has also been strengthened over the years with regards to biodiversity, moving from aspiring for 'no net losses of biodiversity to requiring a 'biodiversity net gain'. This is in line with the Government's 25 Year Environment Plan and strengthened by the requirement for a minimum 10% net gain under the Environment Act (2021) and changes to the Town and Country Planning Act (1990).

Chapters 15 and Paragraph 180 identify the importance of the planning authority to contribute to and enhance the natural and local environment.

> *180. Planning policies and decisions should contribute to and enhance the natural and local environment by:*
> *(a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
> *(b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
> *(c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
> *(d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
> *(e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
> *(f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*

Paragraphs 185 and 186 go on to require plans to protect and enhance biodiversity and geodiversity:

> *179. To protect and enhance biodiversity and geodiversity, plans should:*
> *(a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local*

partnerships for habitat management, enhancement, restoration or creation; and

(b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

180. When determining planning applications, local planning authorities should apply the following principles:

(a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

(b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

(c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons [63] and a suitable compensation strategy exists; and

(d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

National Planning Policy Guidance

- This guidance details how to conduct environmental impact assessments, the purpose of them and when they are required.
- The chapters relevant to biodiversity are chapters on Climate Change, Natural Environment and Environmental Impact Assessments.
- Natural Environment details the information and assessment needed at different stages of development. It advises on how planning can help conserve healthy soils, brownfield sites with high biodiversity, including green infrastructure.
- How local authorities can plan for biodiversity, and evidence that can be gathered from mapping ecological networks, as well as safeguard local wildlife sites and local geological sites.
- It details how to consider species and ecosystem services in planning, as well as in the planning application.
- It details achieving Net Gain, the Mitigation hierarchy and considerations when planting trees near settlements and finding ancient woodland and information on how planning can ensure conservation of landscapes.

Other Strategies:
Babergh and Mid Suffolk Biodiversity Action Plan
Babergh and Mid Suffolk Carbon Reduction Management Plan

The Biodiversity Action Plan and Carbon Reduction Management Plan are responses to enhancing and protecting biodiversity. They identify local strategies and plans for wildlife, supported by the Local Nature Recovery Strategy.

In 2019, following climate emergency declarations, the Councils set up an Environment and Climate Change Task Force to look at the climate challenge the districts face. Following engagement with environmental experts, the task force presented their recommendations to cabinets in July 2020. The proposals were unanimously approved, forming the two councils' first Carbon Reduction Management Plan.

A task force subcommittee then looked at biodiversity in the Districts. Their recommendations were presented to cabinets in November 2020. This formed the Biodiversity Action Plan, which sets out how the Councils aim to protect and strengthen plant life and local wildlife in the Districts.

There are several reports made by the Councils of how they plan to tackle biodiversity and the success of schemes so far.

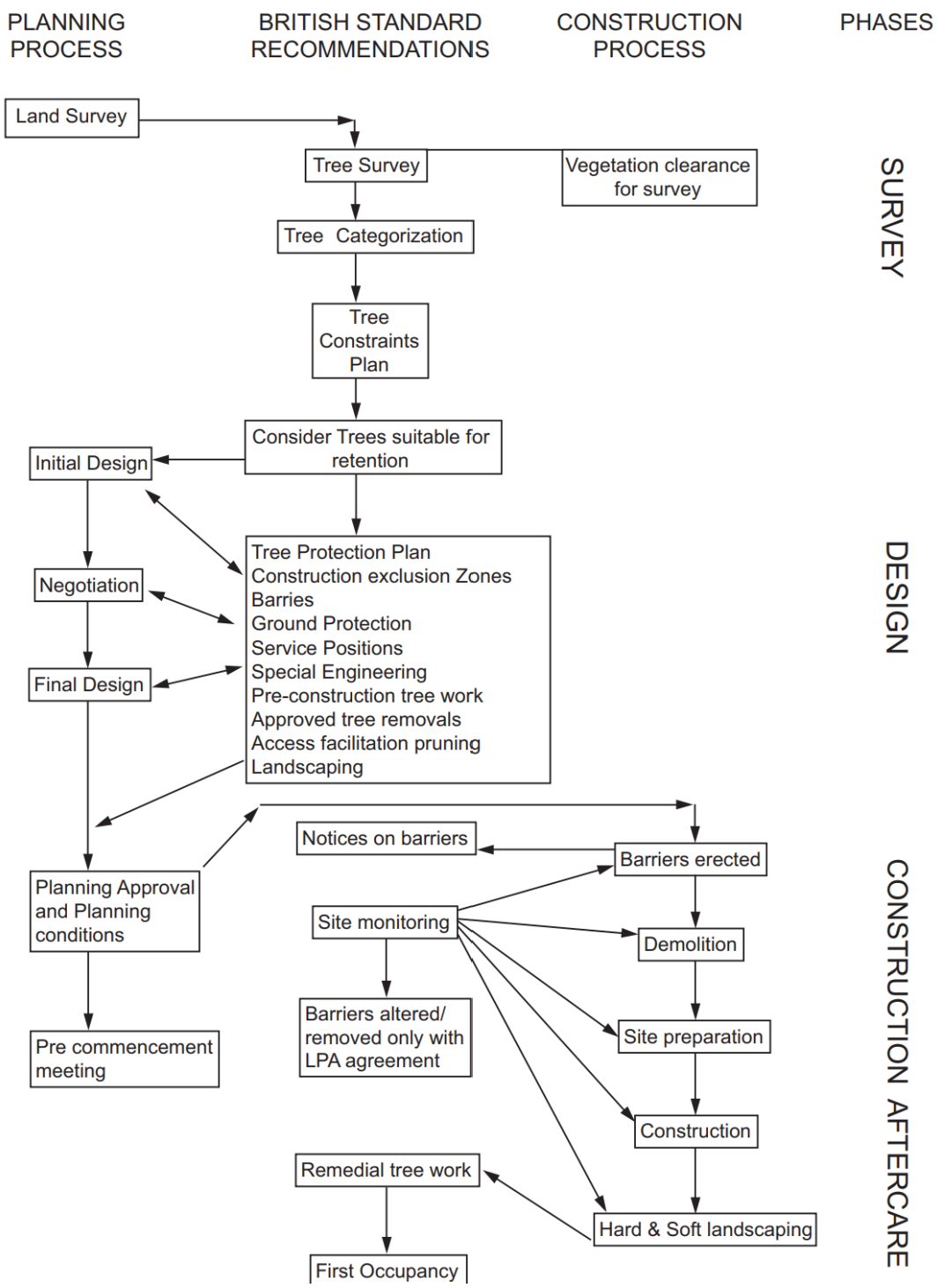
Other strategies being prepared include the Green Infrastructure Strategy, the Tree Planting Strategy and a revised Open Space Assessment.

Appendix 3 – Guidelines for Ecological Survey Timings

See Appendix B of Suffolk Biodiversity Validation Checklist

Appendix 4 – Trees in Development

British Standard 5837 (2012): Trees in Relation to Design, Demolition and Construction.



Tree Constraints Plan

The Tree Constraints Plan should be a combination of the information gathered during a topographical survey (location of all trees, shrubs and hedges and other relevant features such as streams, buildings and spot level heights) and an accurate tree survey.

The tree survey should be carried out in accordance with BS 5837 (2012) and contain the following information about each tree on the site that has a stem diameter above 75mm measured at 1.5m above ground level, and those trees of smaller diameter that are of particular interest or potential value:

- A tree reference number (this should relate to the to the Tree Constraints Plan).
- Tree species.
- Height.
- Stem diameter taken at 1.5m from ground level (Diameter at Breast Height).
- Branch spread (in four directions North, East, South and West).
- Height of crown clearance above ground.
- Age class.
- Physiological condition.
- Structural condition.
- Preliminary management requirements.
- Estimated safe useful life expectancy.
- Category grading (see BS 5837).

It is important to remember that the parts of a tree that lie below the soil surface, its' roots, are just as important as those above ground (trunk, branches, leaves).

Every effort should be made to ensure that the roots of retained trees are not damaged during the construction process.

Root problems can lead to a decline in a tree's health resulting in the need for a tree to be removed or even structural collapse.

Tree roots can be easily damaged by:

- Abrasion.
- Crushing by vehicles/plant equipment and/or storage of building materials or soil.
- Compaction of the surrounding soil leading to root death by asphyxiation (lack of oxygen) or drought (inability to obtain water).
- Severing and removal of roots by excavation.
- Poisoning from spillage or storage of fuel, oil, chemicals etc.
- Changes in soil levels around trees resulting in root death as a result of exposure or asphyxiation.

- Installation of impermeable surfaces leading to a decline in tree health due to lack of water.

It is vital therefore that the Tree Constraints Plan should also clearly show the Root Protection Area of each tree.

A tree's Root Protection Area can be equated to a circle, using the tree as the centre-point, with a radius that is twelve times the tree's Diameter at Breast Height for a single stemmed tree, or alternatively ten times its basal diameter measured above the root flare for a multi-stemmed tree.

Tree Protection Plan

Trees are particularly vulnerable on development sites and may be affected either immediately if removal or pruning is necessary to accommodate a development, or in the longer term.

This may be as a result of disturbance during the development process or following pressure to remove or prune trees from the occupants of new buildings.
The design layout should take these issues into account.

Once it has been decided which trees, hedges or shrubbery are to be incorporated into a design layout it is important to ensure that they will survive the development process.

A Tree Protection Plan is an essential aspect of tree protection with regard to development.

The Tree Protection Plan is a scale plan showing:

- Any proposed or existing buildings or structures.
- All retained trees both on and neighbouring the site and their corresponding Root Protection Areas and crown spreads (N, E, S and W).
- The location of protective fences or barriers (details of how these are to be constructed must also be supplied).
- Proposed location of all plant and materials storage.
- Drainage runs, roads and driveways.
- Existing and new accesses.
- Any other surface or underground features that may affect the trees on or neighbouring the site.

Arboriculture Method Statement

If construction or the laying of hard surfaces is allowed within the Root Protection Area of a tree, or if any part of the development process is likely to detrimentally affect any retained trees, then it is likely that an Arboriculture Method Statement will be required. An Arboriculture Method Statement details the methodology for the implementation of any aspect of development, that has the potential to result in the loss of or damage to a tree and explains how this damage will be avoided.

Appendix 5 – BNG Guidance from the Chartered Institute of Ecology and Environmental Management (CIEEM)

Principle 1: Apply the Mitigation Hierarchy.

Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision-makers where possible, compensate for losses that cannot be avoided. If compensating for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere.

Principle 2: Avoid Losing biodiversity that cannot be offset to achieve No Net Loss or Net Gain.

Avoid impacts on irreplaceable biodiversity - these impacts cannot be offset to achieve No Net Loss or Net Gain.

Principle 3: Be inclusive and equitable.

Engage stakeholders early, and involve them in designing, implementing, monitoring and evaluating the approach to Net Gain. Achieve Net Gain in partnership with stakeholders where possible and share the benefits fairly among stakeholders.

Principle 4: Address risks Mitigate difficulty, uncertainty and other risks to achieving Net Gain.

Apply well-accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any remaining risks, as well as to compensate for the time between the losses occurring and the gains being fully realised.

Principle 5: Make a measurable Net Gain contribution.

Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.

Principle 6: Achieve the best outcomes for biodiversity.

Achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge to make clearly justified choices when:

- Delivering compensation that is ecologically equivalent in type, amount and condition, and that accounts for the location and timing of biodiversity losses.
- Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation.
- Achieving Net Gain locally to the development while also contributing towards nature conservation priorities at local, regional and national levels.

- Enhancing existing or creating new habitat.
- Enhancing ecological connectivity by creating more bigger, better and joined areas for biodiversity.

Principle 7: Be additional.

Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e., do not deliver something that would occur anyway).

Principle 8: Create a Net Gain legacy Ensure Net Gain generates long-term benefits by:

- Engaging stakeholders and jointly agreeing practical solutions that secure Net Gain in perpetuity.
- Planning for adaptive management and securing dedicated funding for long-term management.
- Designing Net Gain for biodiversity to be resilient to external factors, especially climate change.
- Mitigating risks from other land uses.
- Avoiding displacing harmful activities from one location to another.
- Supporting local-level management of Net Gain activities.

Principle 9: Optimise sustainability.

Prioritise Biodiversity Net Gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy.

Principle 10: Be transparent.

Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.

Biodiversity Net Gain should be applied to all developments which are subject to it in the Town and Country Planning Act. There is specific guidance for smaller developments wishing to apply biodiversity Net Gain, including use of the Small Sites Biodiversity Metric.

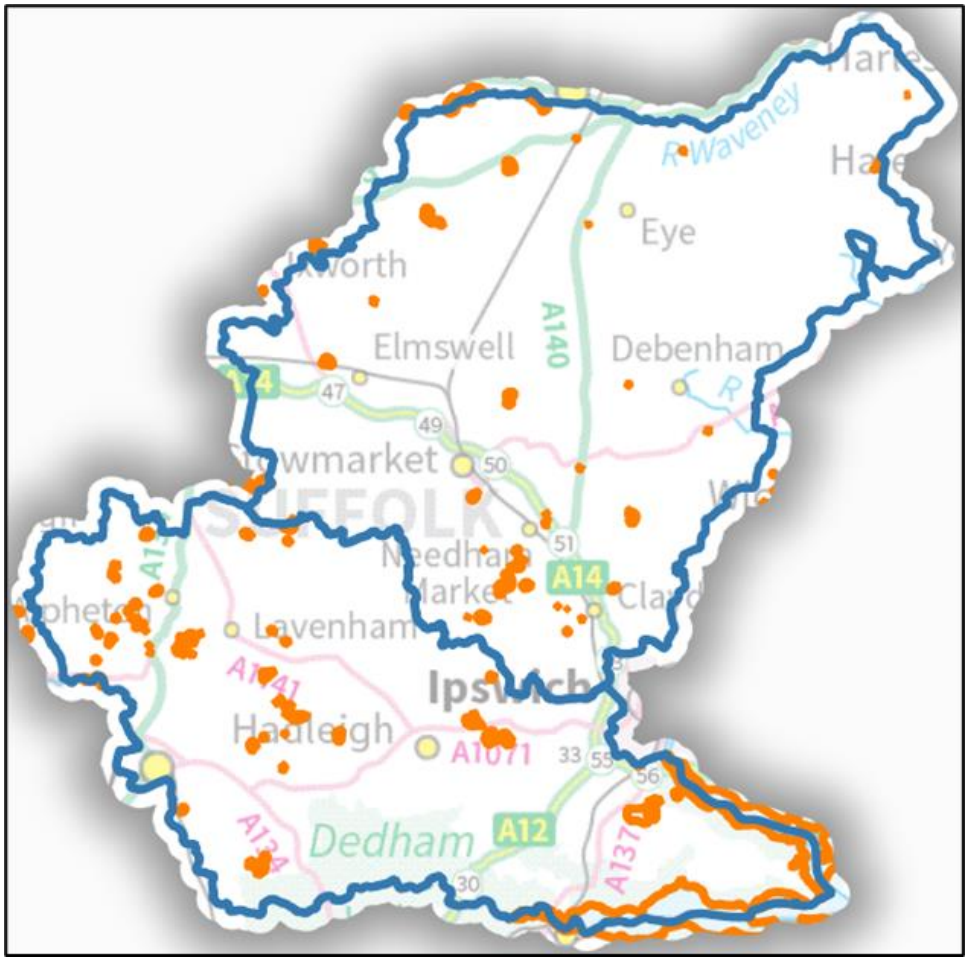
Appendix 6 – Designated sites in Babergh and Mid Suffolk

Babergh Sites of Special Scientific Interest:

- Arger Fen, Bures St Mary and Nayland with Wissington
- Bobbitshole, Pinewood
- Brent Eleigh Woods, Brent Eleigh
- Cattawade Marshes, Brantham
- Cornard Mere, Little Cornard
- Edwardstone Woods, Edwardstone
- Elmsett Park Wood, Elmsett
- Freston and Cutler's Wood with Holbrook Park
- Frithy and Chadacre Woods, Lawshall and Shimpling
- Glemsford Pits, Glemsford
- Groton Wood, Groton
- Hintlesham Woods, Hintlesham
- Kentwell Woods, Long Melford
- Lineage Wood and Railway Track, Long Melford
- Milden Thicks, Milden and Little Waldingfield
- Orwell Estuary
- Stour Estuary
- Thorpe Morieux Woods, Cockfield and Thorpe Morieux

Mid Suffolk Sites of Scientific Interest:

- Barking Woods, Barking
- Burgate Wood, Burgate
- Chippenhall Green, Fressingfield
- Combs Wood, Stowmarket
- Creeting St Mary Pits, Creeting St Mary
- Fox Fritillary Meadow, Framsden
- The Gardens, Great Ashfield
- Gripping Great Wood, Stowmarket
- Gosbeck Wood, Gosbeck
- Great Blakenham Pit, Great Blakenham
- Gypsy Camp Meadows, Thrandeston
- Hascot Hill Pit
- Hoxne Brick Pit, Hoxne
- Lingwood Meadows, Earl Stonham
- Little Blakenham Pit, Little Blakenham
- Major Farm Meadow, Braiseworth
- Metfield Meadow, Metfield
- Mickfield Meadow, Mickfield
- Middle Wood, Offton
- Norton Wood, Norton
- Redgrave and Lopham Fens
- Sandy Lane Pit, Barham
- Westhall Wood and Meadow, Rickinghall
- Wortham Ling, Wortham



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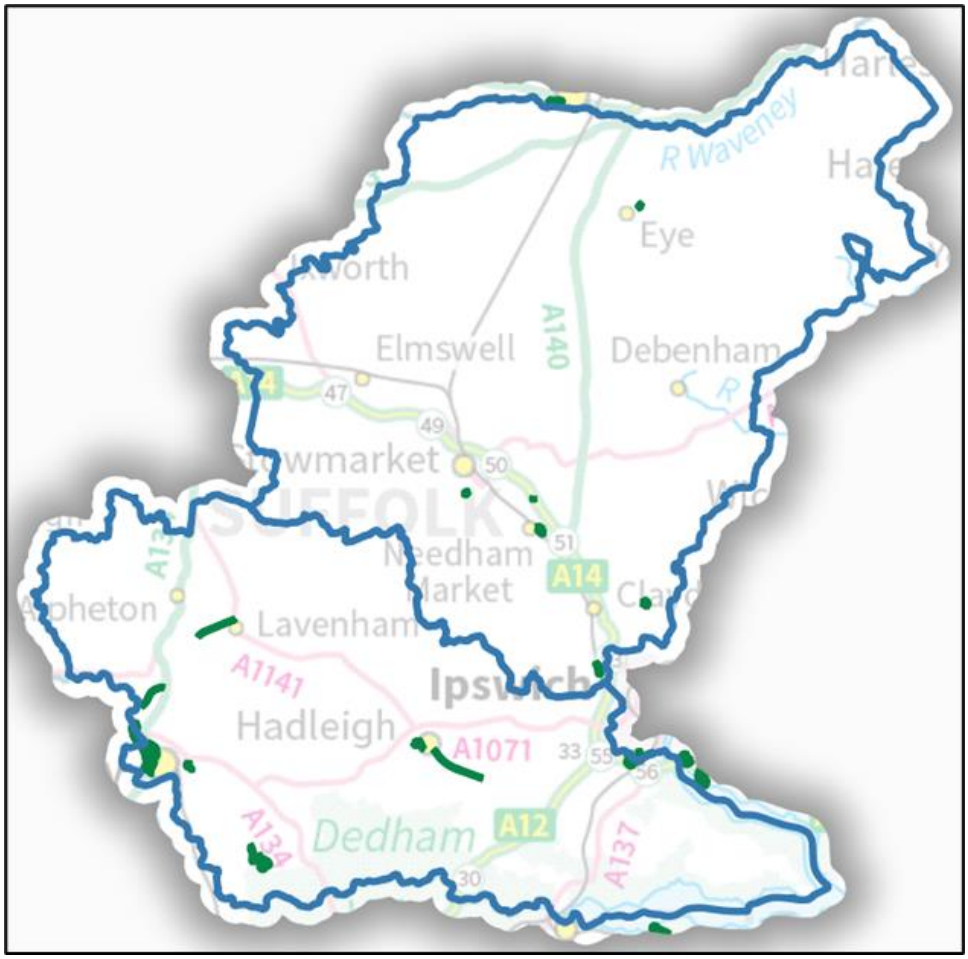
Babergh Local Nature Reserves:

- Arger Fen and Spouse's Vale, Bures St Mary
- Bobbits Lane, Pinewood
- Broom Hill, Hadleigh
- Millenium Wood, Pinewood
- Railway Walk, Hadleigh
- Riverside Walk, Hadleigh
- Shawlands Wood, Great Cornard
- Spring Wood, Belstead
- Sudbury Common Lands, Sudbury
- The Railway Walks, Lavenham
- The Railway Walks, Long Melford
- The Railway Walks, Sudbury
- Tiger Hill, Bures St Mary

Mid Suffolk Local Nature Reserves:

- Bramford Meadows, Bramford
- Church Meadow, Combs Ford
- Fen Alder Carr, Creeting St Mary
- Needham Lake, Needham Market
- The Pennings, Eye
- Rede Wood, Claydon



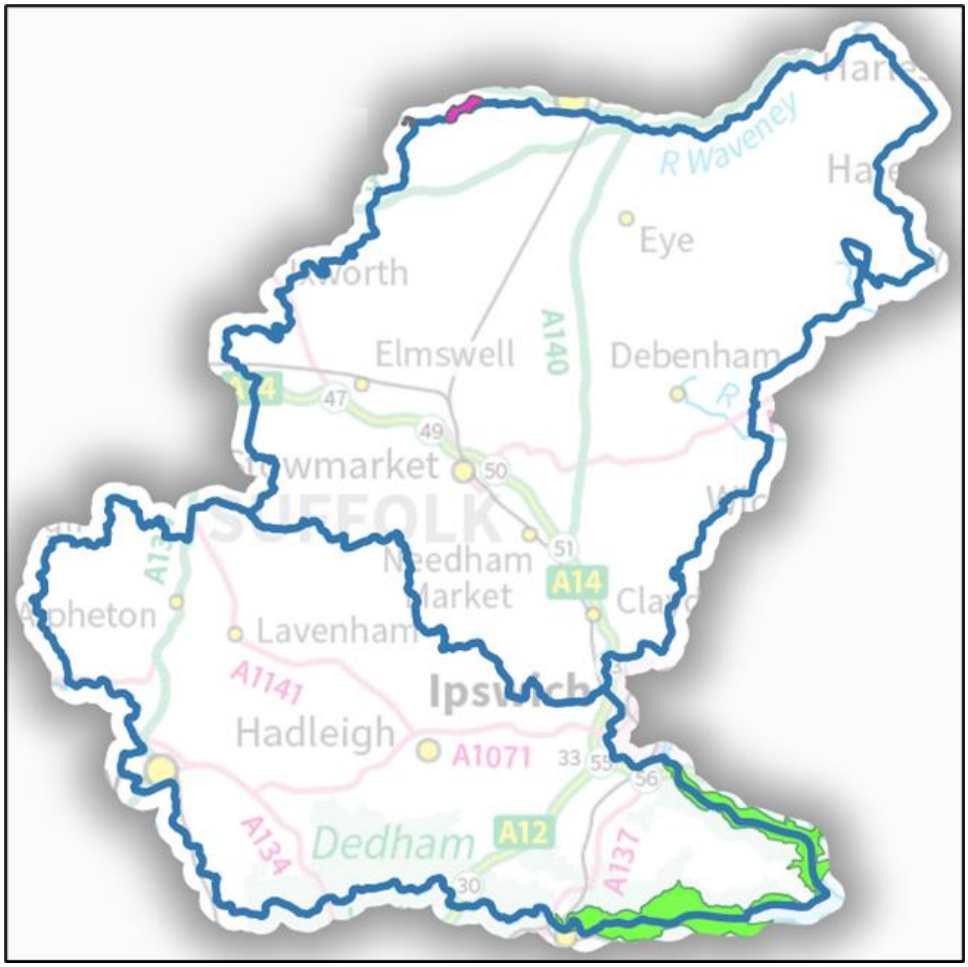
B&MS Local Nature Reserves

Babergh Special Protection Area/Ramsar Site:

- Stour and Orwell Estuaries SPA and Ramsar site (Suffolk/Essex)

Mid Suffolk Special Area of Conservation/Ramsar Site:

- Waveney and Little Ouse Valley Fens SAC (Suffolk/Norfolk)
- Redgrave & South Lopham Fens Ramsar site (Suffolk/Norfolk)



B&MS SPA/SAC/Ramsar sites

Appendix 7 – Priority Species and Habitats in Suffolk

Priority Species

Amphibians and Reptiles
Ants, Bees and Wasps
Aquatic Invertebrates
Beetles
Birds
Bugs
Butterflies
Crickets and Grasshoppers
Dragonflies and Damselflies
Ferns and Flowering Plants
Fish (freshwater)
Flies
Freshwater Algae
Fungi and Slime Moulds
Galls
Lichens
Liverworts and Mosses
Mammals
Mammals – Bats
Marine Life (including fish)
Molluscs
Moths
Other Invertebrates
Spiders and Other Arachnids

Priority Habitats

Arable field margins
Coastal and floodplain grazing marshes
Coastal saltmarsh and intertidal mudflats
Coastal sand dunes
Coastal vegetated shingle
Hedgerows
Lowland acid grasslands and heathlands
Lowland calcareous grasslands
Lowland fens
Lowland meadows
Lowland mixed deciduous woodlands
Marine habitats
Maritime cliffs and slopes
Open mosaic
Ponds
Reedbeds
Rivers and streams
Saline lagoons
Traditional orchards
Wet woodlands
Wood pastures and parklands

Source: https://www.suffolkbis.org.uk/species

Appendix 8 – Monitoring and Fees

Management and Monitoring Plans

Management and Monitoring Plans will need to be submitted as part of a detailed Biodiversity Net Gain Plan. Separate plans will be needed for onsite and off-site delivery of biodiversity units and should include the following pieces of information:

- The baseline biodiversity assessment against which an uplift in biodiversity value will be monitored.
- The project's biodiversity targets.
- A detailed management plan setting out how habitats will be created or enhanced and describing the proposed ongoing management for a minimum of 30 years.
- The details of when target condition will be achieved and how it shall be maintained. A detailed monitoring plan that will be used to inform ongoing management and assess the progress towards achieving target condition. This should outline the surveys that will be used to inform condition monitoring reports. Monitoring reports will be provided to the Local Planning Authority in years 1, 2, 3, 5, 10, 15, 20, 25 and 30. The roles, responsibilities and professional competencies of the people involved in implementing and monitoring the biodiversity net gain delivery.
- Evidence that the necessary resources are available to deliver the proposed biodiversity net gain plan and the ongoing management.
- GIS files showing the baseline biodiversity values and all proposed target biodiversity values for any created or enhanced habitats both on and off-site. These GIS files shall be updated following monitoring surveys and with current condition values and submitted to the local planning authority as part of monitoring report.

Changes to a previously agreed management plan, suggested as a result of monitoring visits, shall be agreed in writing by the respective Council.

Fees

A monitoring fee will be secured to ensure biodiversity net gain is being achieved in line with the Biodiversity Net Gain Management and Monitoring Plan. The Councils must track and record the progress towards reaching biodiversity net gain. The Biodiversity Net Gain Management and Monitoring Plan will also be required to set out the frequency for the respective Council to be sent audit reports.

The fee will cover the costs of reviewing audit reports, it will take into account site progress checks and keep track of cumulative gains and losses as well as report information internally and to Government. The fee will be used to calculate the Councils' monitoring cost, and this will be secured as a fee to the respective Council through a legal agreement with the developer. This is additional to any fees which are paid to the Councils to determine planning application and legal fees for the drafting of legal agreements.

A legal agreement will need to be completed between the respective Council and the developer which secures the delivery of the biodiversity units to achieve biodiversity net gain and to maintain the land in the long term (for at least 30 years).