

Our ref: BMS Draft SPD Consultation
Your ref: Draft Biodiversity and Trees SPD
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Dear Robert Hobbs,

RE: Draft Biodiversity and Trees Supplementary Planning Document Consultation

Thank you for the opportunity to comment on the Draft Biodiversity and Trees Supplementary Planning Document. Ipswich Borough Council's Planning Policy Team have provided comments from the perspective of a partner in the Suffolk Coast RAMS project and adjoining authority.

Introductory Chapter

Paragraph 1.5 specifically addresses the purpose of the SPD; however, it does not reference the Suffolk Coast RAMS chapter (chapter 3). It may be beneficial to explain that Ipswich and East Suffolk Councils have adopted the Suffolk Coast RAMS SPD and that B&MS has integrated this information into the Draft Biodiversity and Trees SPD to align with the partner RAMS authorities, ensuring a cohesive strategy across the RAMS area.

Suffolk Coast RAMS – Chapter 3

The Draft Biodiversity and Trees SPD states in paragraph 3.2 (2) that developments consisting of 50 dwellings or more will be required to demonstrate well-designed open space/green infrastructure, proportionate to their scale. This requirement also applies to sites within a certain distance of designated areas. Although this is discussed later in paragraph 3.6.11, it is not mentioned in paragraph 3.2 (2). For consistency, it could be referenced in paragraph 3.2 (2), perhaps as a footnote to the policy text. Clarification on the specific distance is currently being sought from Natural England, and the outcome of these discussions should be considered before adopting the SPD.

In paragraph 3.6.4, a direct link to the Suffolk Coast RAMS Strategy document is provided. Since the RAMS authorities are about to commence a review of the Strategy, it would be beneficial to link to the relevant webpage, as opposed to the document itself. This would allow the Strategy to be updated on the webpage, preventing the Biodiversity and Trees SPD from becoming outdated when the new/updated RAMS Strategy is published in 2025.

Paragraph 3.6.5 refers to "*habitat sites likely to be affected by development in Babergh and Mid Suffolk Districts*". To avoid any confusion, it may be beneficial to clarify that funds will be spent across the entire Strategy area. For example, the adopted Ipswich RAMS SPD states that "*monies collected from zones A and B will be combined and spent across the tariff area*".

Paragraph 3.6.8 of the Draft Biodiversity and Trees SPD states that habitat sites currently have a Zone of Influence (ZOI) of 13km. As the Suffolk Coast RAMS is about to embark on a review process, including a review of the ZOI, it may be beneficial not to specifically mention the existing 13km ZOI to enhance the Draft Biodiversity and Trees SPD's longevity. Instead, a reference to the ongoing review process could be added, stating that the ZOI may change in response to the review and more detailed visitor survey information. Any revisions to the ZOI would then be published on the Council's website, aligning with the caveats around the tariff outlined in paragraph 3.6.10. Alternatively, a link could be provided to a map layer displaying the ZOI for accessibility and clarity.

The reference to index linking of the RAMS tariff is welcomed, this will ensure that the Strategy secures sufficient funds to deliver the recreational mitigation required.

The alignment between the Ipswich and East Suffolk, Suffolk Coast RAMS SPD is welcomed. It would be beneficial to acknowledge the connection between the Draft Biodiversity and Trees SPD and the adopted Ipswich and East Suffolk, Suffolk Coast RAMS SPD, explaining the rationale behind this coordinated approach.

Biodiversity Net Gain

Paragraph 4.25 of the Draft Biodiversity and Trees SPD outlines the location hierarchy for off-site Biodiversity Net Gain (BNG). If it's demonstrated that BNG cannot be feasibly delivered on-site, the SPD mandates that the applicant prioritise off-site BNG delivery according to the following locational hierarchy:

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

Considering that Babergh and Mid Suffolk directly adjoin Ipswich Borough and given the presence of several strategic development sites near the Ipswich Borough boundary, it is suggested that before requiring development to provide off-site BNG within the wider Suffolk Local Nature Recovery Strategy Area, consideration should be given to providing it within the closest adjoining Borough/District.

Paragraph 4.29 discusses the use of a matrix for scoring BNG delivery sites without providing a link to the matrix. Previously, the Suffolk Authorities collaborated to create interim guidance on BNG and successfully worked together on aligned approaches. It would be advantageous if all authorities could agree to utilise the matrix as an interim system for scoring the strategic significance of BNG sites.

Paragraphs 4.31 - 4.34 discuss biodiversity measures specifically in household applications. The reasoning behind why these measures are addressed separately is not clearly explained in the text. It is understood that householder development is exempt from mandatory BNG and clarifying this exemption for the lay reader may be beneficial.

Conclusions

Nature operates without consideration for geographical boundaries, and there is a lack of acknowledgment regarding the importance of coordinating with neighbouring Boroughs/Districts' nature conservation strategies, especially in areas where development is situated near District boundaries. It is essential to recognise that ecosystems extend beyond administrative borders and that collaboration with adjacent Districts is crucial for effective nature conservation and management, particularly when development activities have the potential to impact shared habitats and biodiversity. Therefore, it would be beneficial to include provisions that emphasize the significance

of cross-boundary cooperation and the integration of neighbouring Borough/Districts' nature conservation strategies, ensuring a holistic approach to environmental and biodiversity protection. For Ipswich this would include recognition of the Ipswich Ecological Network, green and blue corridors and green trail, as identified through Policy DM8 The Natural Environment, Policy DM10 Green and Blue Corridors, Plan 5 Ipswich Ecological Network and Plan 6 Green Corridors. The Draft Biodiversity and Trees SPD does recognise the significance of the Suffolk Local Nature Recovery Strategy (LNRS). However, the Suffolk LNRS is still in the development phase and has not yet been published, as such there is currently no avenue for aligning with neighbouring authorities' nature conservation strategies through this draft SPD.

Thank you again for the opportunity to comment on this draft SPD. If you require further detail on any of the matters raised please don't hesitate to get in touch using the contact details provided in the header of this letter.

Yours sincerely,



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Ipswich Borough Council