



Babergh and Mid Suffolk

Joint Local Plan

Hearing Statement – Matter 7

Environment Policies

June 2021



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Introduction

This Hearing Statement has been produced by the Councils for the Babergh and Mid Suffolk Joint Local Plan (JLP) Examination in response to the Inspectors' Matters and Questions. The entire Core Document Library for the JLP Examination can be accessed online. The Councils have responded to each Question directly in the body of the Hearing Statement. Appendix 1 provides a specific but brief response to each of the Main Issues raised during the period for representations following the publication of the JLP (as requested at paragraph 22 of the Inspectors' Examination Guidance Note).

For further information please visit the Council's JLP Examination webpages below:

<https://www.babergh.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-submission/joint-local-plan-examination/>

<https://www.midsuffolk.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-submission/joint-local-plan-examination/>



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Question 7.1

➤ a) *Is policy SP09 based on robust and up to date evidence?*

- 1.01 The Councils consider that policy SP09 is based on robust and up to date evidence. Policy SP09 is a strategic policy which seeks to enhance and manage the environment, and is supported by detailed local (development management) policies such as LP17 – Environmental Protection and LP18 – Biodiversity. The Joint Local Plan is supported by a wide evidence base including plan wide assessments/guidance of landscape, through the Councils Landscape Guidance ([Document D08](#)); flood risk, through the Councils Strategic Flood Risk Assessment ([Document EE11](#)); and Water Cycle Study ([Document EE17](#) and [Document EE18](#)). Furthermore site specific appraisals of landscape ([Document EE12](#)), heritage ([Document EE13](#) & [EE15](#)) and flood risk ([Document EE16](#)) have helped shape the plan's strategy.
- 1.02 Environmental corridors were identified within the Green Infrastructure Strategies (Documents [EE01](#), [EE02](#), [EE03](#) & [EE04](#)), which provides information in the first instance regarding where these corridors are located. However, there is currently a review of County Wildlife Sites (CWS) and wildlife corridors ongoing and initial/draft data will be available from July 2021, with the aim to publicise final work August/September 2021. The review has been commissioned by the Babergh and Mid Suffolk Biodiversity Taskforce, Terms of Reference can be seen in Appendix 02. The updated information will be used to create an up to date Green Infrastructure Strategy to consolidate measures/projects required to ensure biodiversity off-setting are delivered effectively in appropriate identified areas.
- 1.03 Impacts upon European and National protected sites have been assessed through the Habitats Regulations Assessment ([Document A05](#)) carried out during the production of the Joint Local Plan and the recommended mitigation measures have been incorporated into the plan.

b) Is it sufficiently clear, including in relation to where the Suffolk Coast RAMS applies?

- 1.04 Yes. Paragraph 12.14 of the Joint Local Plan, and the map on page 56 identifies the 'Zone of Influence' in which contributions are triggered. Reference is also made in the background text in settlements where the RAMS contributions are triggered. Evidence for the 13km Zone of Influence is set out in The Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy (Suffolk Coast RAMS) ([Document EE09](#)).

c) Will it be effective?

1.05 SP09 provides for a collaborative approach between Babergh, Mid Suffolk, Ipswich and East Suffolk to mitigate recreational and leisure disturbance to protected habitats in the Stour, Orwell and Deben estuaries caused by new residential development. The policy provides an effective mechanism to seek contributions which will be used to mitigate impacts in accordance with the recommendations set out in the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (Suffolk Coast RAMS). The Councils have gathered contributions triggered under HRA work for the area identified as Suffolk Coast RAMS since 2014. The Suffolk Coast RAMS Strategy ([Document EE09](#)) has enabled a robust approach to identifying projects and mitigation measures over a 15-year period to address cumulative impacts in a more effective manner. When considered in conjunction with the relevant detailed local (development management) policies, the Councils consider that SP09 will be effective in enhancing and managing the natural and local environment.

Question 7.2

- ***Are the requirements of policy SP10 sufficiently clear including with regard to what is required from developers and will the policy be effective?***

2.01 Policy SP10 provides a high-level strategic policy in relation to Climate Change matters. The policy is supported by a number of detailed local (development management) policies, such as LP25 – Sustainable Construction and Design, which provides greater detail on the Councils expectations for development. The Councils believe that, in line with paragraph 21 of the NPPF ([Document C19](#)), Policy SP10 covers sufficient detail for a strategic policy, and that it is appropriate to deal with matters of detail in the local (development management) policies.

Question 7.3

- ***a) Is policy LP17 consistent with national policy and other parts of the plan?***

3.01 The NPPF Environment Objective includes making effective use of land, using natural resources prudently and minimising waste and pollution. Paragraph 170 of the NPPF requires plans to prevent 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 stability.

3.02 Para 180 of NPPF states policies should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment.



- 3.03 The Councils consider that the policy is consistent with the other parts of the plan, and is consistent with the NPPF.

b) Are the requirements of the policy clear?

- 3.04 The policy has been set out with sections of each topic area to provide clarity and criteria within each section to provide greater comprehension of what is required for all development proposals. The policy should be read in conjunction with the relevant legislation and national guidance, which often changes to meet the latest best practice and science. The Councils believe the policy to be clear, where compliance can be demonstrated through Design and Access Statements and Construction Environment Managements Plans.

c) Would the policy be effective including in relation to the use of brownfield v greenfield land, light pollution and air quality?

- 3.05 There is a limited supply of suitable, achievable and deliverable previously development land (PDL) / 'brownfield' sites/land within the Districts. However, where possible, the Councils support the appropriate development of these where suitable opportunities exist.
- 3.06 The policy seeks to prevent or where practicable reduce all forms of possible pollution including air and light pollution. This includes but is not limited to AQMAs. The strategic transportation improvements referred to in strategic Policy SP08 aim to address the air quality issues concerning the wider Ipswich Strategic Planning Area.
- 3.07 When read in conjunction with the NPPF, PPG and other policies of the Plan (eg. SP08) the policy is considered effective.

d) is there robust evidence to justify the policy?

- 3.08 Yes - The environmental objectives set out in the JLP include; to protect and enhance environmental assets (including landscapes, air and water quality and river corridors) and to reduce the drivers of climate change. The policy expands upon the objectives to provide clarity and guidance of what is required for development proposals within the districts.
- 3.09 The Sustainability Appraisal (SA) baseline ([Document A04](#), Appendix B) notes that the majority of land within Babergh and Mid Suffolk is Agricultural Land Classification Grade 2 and 3 demonstrating the lack of lower grade agricultural land and brownfield sites. It also notes that both districts are prone to drought and are located within a water stressed area. Therefore, there is a need to plan for effective and reliable water systems in place to reduce any harm associated



with droughts. The Water Cycle Study ([Document EE17](#), page 96) has identified the majority of the waterbodies have a moderate or poor ecological status with sewage discharge cited as one of the “*reasons for not achieving good status*”.

- 3.10 Results from air quality assessments found Cross Street, Sudbury was the only area with concentrations of nitrogen dioxide higher than the health based annual mean Air Quality Objective. Although it is noted that primarily, for Babergh and Mid Suffolk and surrounding areas, air pollution follows the main road transport corridors with concentrations in the urban areas, the main roads within the two Districts (A12, A14 and A140) and the railway between London and Norwich, have not been found to have significant poor air quality. The SA baseline does note that the proposed increase in development will impact upon the AQMAs for Ipswich which is to be taken into account for all development proposals around the Ipswich boundary. Noise pollution is not a major issue in Babergh and Mid Suffolk, and again tends to be associated with the main transport corridors.
- 3.11 Air Quality Annual Status Reports are provided by the Councils’ Environmental Health Department however as this is health based only, an additional air quality assessment is being undertaken to ascertain baseline data upon identified designated habitats sites in the HRA. The baseline data will be used to monitor and manage future development within identified locations and trigger further air quality mitigation measures where required.
- 3.12 All development is required to SCC Construction Surface Water Management Plan and all other forms of pollution are assessed on a site-by-site basis.

Question 7.4

➤ **a) Is policy LP18 consistent with national policy?**

- 4.01 Policy LP18 is considered consistent with the NPPF (paragraphs 170, 174 & 175). LP18(1) sets out the need for all development to follow the biodiversity hierarchy in line with paragraph 175. LP18(2) is consistent with NPPF, paragraphs 170, 174 and 175. Criteria (3) is consistent with the NPPF, paragraph 175.
- 4.02 The Policy is consistent with NPPF para 170, in that it seeks to ensure development contributes to and enhances the natural and local environment by protecting and enhancing sites of biodiversity or geological value. In accordance with NPPF para 174, the Policy requires development to contribute to minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. In accordance with paragraph 174 of the NPPF, the policy promotes the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species. Furthermore, consistent with NPPF para



175, the Policy addresses consideration and mitigation of adverse impacts on biodiversity.

b) Are the requirements of the policy clear? In particular is there sufficient clarity regarding County Wildlife Sites, environmental corridors and how off-setting would work?

4.03 The requirements of LP18 are considered clear and in accordance with the mitigation hierarchy:

- Part 1 focuses on the mitigation hierarchy,
- Part 2 sets clear criteria to protect designated sites and to conserve, restore and contribute to enhancement of biodiversity and geodiversity.
- Part 3 addresses considerations where development would have an adverse impact.
- Mechanisms to address compensation are set out in Part 4.

4.04 There is a detailed dataset of Suffolk's non-statutory County Wildlife Sites (CWS). As a local planning authority, the Councils are provided information on the CWS within the two districts which provides a robust set of information. Due to site and species specific sensitivities it is not appropriate for all of the information to be in the public domain. Instead information would be discussed where relevant to specific applications in the appropriate forum. The approach to consideration of County Wildlife Sites is included within "*designated*" and "*potentially designated sites*" specified in Policy LP18(2a), and identified in paragraph 15.19 of the plan.

4.05 Environmental corridors are identified within the Green Infrastructure Strategies (Documents [EE01](#), [EE02](#), [EE03](#) & [EE04](#)), which provide information in the first instance regarding where these corridors are located. There is currently a review of CWS and wildlife corridors ongoing and initial/draft data will be available from July 2021, with the aim to publish final work August/September 2021. The updated information will be used to create an up to date Green Infrastructure Strategy to consolidate measures/projects required to ensure biodiversity off-setting are delivered effectively in appropriate identified areas.

4.06 As set out in Paragraph 15.11 of the Plan, the approach endorsed for calculations of biodiversity net gain is likely to be based upon the nationally endorsed approach. It is noted that the DEFRA biodiversity Metric Calculator (which is referred to in para 15.11) has recently been replaced by the Natural England Biodiversity Metric 2.0 (Beta Version). If the Inspector considers that the text in para 15.11 should be amended refer to the most current metric recommended, the Council would be content to propose this modification.

c) Would the policy be effective?

The policy is considered to provide an effective approach to biodiversity and geodiversity in accordance with the NPPF (paras 170, 174 and 175) and the Environment Bill. The Councils are taking a proactive approach in line with NPPF and the emerging Environment Bill which is considered appropriate and effective.

d) Is the policy based on robust evidence that justifies its requirements particularly in relation to

i. the minimum 10% increase for biodiversity

4.07 Paragraph 170d) of the NPPF states that planning policies should contribute to and enhance the natural and local environment by providing net gains for biodiversity. The minimum 10% increase is in line with the emerging Environment Bill Biodiversity gain objective (Section 2 (3)) which sets this as a mandatory target. As set out above, the Councils are seeking to take a proactive and positive approach to biodiversity matters, and consider that the minimum 10% increase for biodiversity is justified.

ii. wildlife corridors?

4.08 Wildlife corridors are identified in both districts Green Infrastructure Strategies and the data is currently under review to meet current governmental requirements. Revised data will be available in draft from July 2021 with the aim to publicise final work August/September 2021. The updated information will be used to create an up to date Green Infrastructure Strategy to consolidate measures required to ensure biodiversity off-setting are delivered effectively in appropriate identified areas.

e) Is it sufficiently clear how the net gains for biodiversity would be measured?

The metric used will be in line with current practice agreed by Natural England and or as identified within the emerging Environment Bill. Paragraph 15.11 explains that currently the most recognised metric in the UK is the Defra Biodiversity Metric. However, this has recently been replaced by the Natural England Biodiversity Metric 2.0 (Beta Version), therefore the Councils will up date paragraph 15.11 to refer to the most current metric recommended

Question 7.5

➤ a) Is policy LP19 clear and would it be effective?

5.01 The policy is considered clear and effective by firstly setting out criteria for the protection and enhancement of landscape character, and secondly detailing requirements for where significant landscape or visual impacts are likely to occur. Policy LP19(1c) identifies that there are a number of local supporting evidence documents, in particular the Councils Landscape Guidance [Document D08](#) and Heritage and Settlement Sensitivity Assessment (Documents [EE05](#) and [EE06](#)). These documents recognise the particular characteristics, qualities and features of all landscape characters within the districts. In accordance with LP19(1c) proposals should be informed by such guidance. Taking the above into account the Councils believe that the policy would be effective in protecting and enhancing landscape character within the districts.

The Council consider that the policy clear, however if the Inspector considers that amendment is required to the supporting text to ensure that there is greater clarity in the consideration of landscape and visual impacts assessments (LVIAs) as part of the decision making process, the Councils would be content to propose modification to para 15.25. The purpose of this would be to ensure it is explicit that LVIAs are considered essential and not optional where development is likely to be visually prominent or would adversely affect landscape character.

Suggested text ref ST06

Paragraph 15.25) *Where development ~~may be~~ **is** visually prominent or **is likely to** adversely affect landscape character, production of a Landscape and Visual Impact Assessment, **will be required**, **This should inform** a strategic landscape masterplans and/or a landscape management plans detailing mitigation proposals. ~~may be required~~*

b) To be sound does the policy need to refer to local landscape designations in neighbourhood plans, and retain existing Visually Important Open Spaces and Special Landscape Area designations?

5.01 All made Neighbourhood Plans are part of the development plan and are expected to be read in conjunction with the national policy and Joint Local Plan. Therefore, the Councils believe it not necessary to cross refer to them as they may be named inconsistently and significantly change over time.



- 5.02 The former Visually Important Open Spaces (VIOS) and Special Landscape Area (SLA) designations were evidenced and based upon the Suffolk Structure Plan (2001) and national guidance dating back to the early 2000's. That approach is considered out of date and less relevant with the current national guidance for Landscape Character Assessment (LCA) which is to protect and enhance the features of the natural environment. These valued features can be identified throughout the landscape characters district wide, not just in isolated pockets. Therefore, the removal of former approach is considered appropriate and in line with current national policy.
- 5.03 Where open spaces previously identified as Visually Important Open Spaces still function as sporting and/or recreational spaces (in line with the Councils Open Space Assessment ([Document EE10](#))) they are designated as open spaces under Policy LP30 of the plan. This is considered to be an appropriate and justified approach.

Question 7.6

➤ ***a) Is policy LP20 consistent with national policy?***

- 6.01 LP20 is considered consistent with the NPPF paras 172 and 180.
- 6.02 Criteria 1) is in line with NPPF paragraph 172 as it sets out the need for development to conserve and enhance the landscape and scenic beauty and the need to protect landscape character and values and heritage assets in the AONB. Including conserving and enhancement of wildlife and cultural heritage which are important considerations in these areas.
- 6.03 Criteria 1d) and 2) are in line with the NPPF paragraph 172a) as they support proposals for local economy so long as it is commensurate with the character and objectives of the AONB.
- 6.04 Criteria 1c) is in line with the NPPF paragraph 180c) as it requires proposals to be sensitive to the landscape and visual impacts including dark skies and tranquil areas.

b) Are the requirements of the policy clear, and would they be effective?

- 6.05 The policy is clear and has been written positively to enable development that will conserve and enhance the landscape and scenic beauty of the AONB.



- c) To be found sound does the policy:**
i. need to identify how development in the project areas and in the setting of the AONB will be assessed?

6.06 The policy clearly refers to development in or near the AONBs, which includes the project areas. The project areas adjoin the AONB and receive AONB services and management, but are not designated as part of AONB. This is also clarified in Para 15.28 of the Plan which states that the protection of AONB's is not just the land within the designation, but also to its setting.

6.07 The Council consider the Policy approach sound, however should the Inspector consider further clarification is required, the Councils would be content to propose modification to 15.27 of the plan:

Suggested text ref ST07

Paragraph 15.27 ...~~These project areas, however, do not currently benefit from the same protection as an AONB.~~
While these project areas, do not currently benefit from the same protection as the AONBs, large areas are Valued Landscapes, Development proposals in the Project Areas should conserve the special qualities that define them as Valued Landscapes and seek to deliver enhancements where the special qualities have been impacted by changes in farming practices or previous development.

- ii. Refer to the need to conserve quality views and the distinctiveness of the AONB and to AONB management plans?**

6.08 The Councils propose a modification to Policy LP20 to refer to the need to conserve quality views and the distinctiveness of the AONB and to AONB management plans.

Suggested text ST08

LP20(1)(f) conserves, quality views and distinctiveness of the AONB, support the public enjoyment of these areas and supports the wider social and economic objectives set out in the AONB Management Plans.

Suggested text ref ST09

LP20(2) Tourism and visitor related development within the AONB will be supported where it reflects the intrinsic quality and respects the character of the AONB of the area, conserves and enhances natural beauty and AONBs and demonstrates the proposal has been informed by all relevant local guidance and the relevant AONB Management Plans [38] which includes the AONBs and identified Project Areas.

iii. Refer to potential future extensions to the AONB?

6.09 The recent adopted extension to the Suffolk Coast and Heaths AONB has taken over 25 years to complete. The Councils acknowledge the aspirations of the Dedham Vale AONB, however, Natural England have currently given no indication of the scope of the area to be reviewed or the project timescales. The Councils can monitor the progress of future AONB projects and they can be taken into account as appropriate through the Plan review. In view of the uncertainty on the timescale and detail, it is not considered appropriate to refer to the future extension in the Plan.

iv. Require that proposals are accompanied by a Landscape and Visual Impact Assessment?

6.10 This is not considered necessary. Policy LP20 should be read in conjunction with the other policies of the plan. Policy LP19(2) sets out the Councils expectations for Landscape and Visual Impact Assessments.

Question 7.7

➤ **a) Is policy LP21 consistent with national policy?**

7.01 Criteria 1 is consistent with NPPF paragraphs 189 and 190 as it requires applications to describe the significance of the heritage asset including contribution made by their setting. The detail required is to be fully justified in the light of the significance and impact identified in the description provided. Heritage assets with archaeological interest will be required to demonstrate how preservation in situ can be achieved. An appropriate desk-based assessment and, where necessary, a field evaluation will be required.

- 7.02 Criteria 2 is consistent with NPPF paragraphs 192 as it supports the re-use/redevelopment of a heritage asset where it would represent optimal viable use. The policy supports proposals that will contribute to the local distinctiveness.
- 7.03 Criteria 3 is consistent with NPPF paragraph 194, 195 and 202 as it sets out that harm to the heritage asset should be avoided in the first instance. Any harm that cannot be avoided, in assessing the planning balance considerations should have regard to the historic environment and the contribution it currently makes to the character of the area and its' sense of place.
- 7.04 Policy LP21 has been produced to be read in conjunction with the relevant legislation (such as the Planning Listed Building and Conservation Area Act 1990) and the NPPF. The Councils have not sought to duplicate paragraphs of the NPPF.

b) Is the policy clear and would it be effective? In particular to be found sound does the policy need to specifically mention Conservation Areas and/ or that it covers both designated and non-designated heritage assets?

- 7.05 Policy LP21 uses the term heritage assets, which is consistent with the NPPF, and is defined in the background text to Policy LP21 (paragraph 15.30). The Councils do not consider there is a need to specifically mention Conservation Areas within the policy as it is encompassed within the term heritage assets.
- 7.06 Non-designated heritage assets are specifically mentioned within LP21(3). The Councils have differentiated between designated and non-designated heritage assets, as within the NPPF different policy tests apply where harm is identified to designated and non-designated heritage assets. Furthermore, non-designated heritage assets are not covered by statutory legislation.
- 7.07 The Councils have engaged with Historic England throughout the development of the plan, and have previously made some amendments prior to the Regulation 19 consultation in line with their comments.

Question 7.8

- ***Is policy LP22 consistent with national policy particularly with regard to highway matters? Is the proposal to remove PD rights justified?***

- 15.01 The Councils proposed a modification to ensure that highways matters in Policy LP22 are consistent with the NPPF. The Councils have agreed with Suffolk County Council to propose the following modification.



Suggested text ref ST10

LP22(1)(l) ~~The proposal must not cause any adverse impacts to highways safety.~~ **Significant impacts on highway safety or the function of the highway network must be mitigated. The resultant impact on highway safety or function must not be severe.**

Suggested text ref ST11

LP22(2)(h) ~~The proposal must not cause any adverse impacts to highways safety.~~ **Significant impacts on highway safety or the function of the highway network must be mitigated. The resultant impact on highway safety or function must not be severe.**

8.01 As two rural districts it is essential to ensure development within the countryside is appropriate to the location and surroundings therefore the removal of PD rights does not restrict appropriate development but retains an overview of all development on sites that have been given permission.

Question 7.9

➤ ***Is the approach in policy LP23 justified?***

9.01 As two rural districts, it is relatively common for agricultural land to be sold for inclusion of a dwelling curtilage. For example, the equivalent existing Babergh Saved Policy (CR10) was used 16 times in the 2019/20 period. Changes from agricultural to residential garden land can be undertaken sensitively with the surrounding landscape. However, the introduction of domestic paraphernalia, such as visible fencing and sheds, can have a negative landscape impact is introduced. The policy ensures changes to agricultural land are designed to retain a sensitivity to the surroundings.

Question 7.10

- **a) Are the requirements of policy LP24 clear, including with regard to what proposals are covered by the policy?**

10.01 The policy is all encompassing to cover new agricultural and rural buildings in the countryside. The policy provides criteria for proposals to be considered including the suitability of location, impact on surroundings and subsequent transport matters. It is noted that the clarity in the application of the policy could be improved by the terminology being made consistent with the NPPF, para 83 by referring to rural development in the countryside, rather than remote, isolated or detached. Should the Inspector consider this appropriate the Council would be content with this modification.

Suggested text ref ST12

LP24(1) *There must be appropriate justification and demonstrable evidence **for any new proposals ~~which are remote, isolated or detached within the countryside which are in rural locations~~**....*

- b) Would the policy be effective?**

10.02 The policy is considered to be robust with the key local matters highlighted. It should be read alongside all other policies within the JLP and the NPPF.

- c) Is the policy consistent with national policy particularly with regard to highway matters?**

15.02 The Councils proposed a modification to ensure that highways matters in Policy LP24 are consistent with the NPPF. The Councils have agreed with Suffolk County Council to propose the following modification:

Suggested text ref ST13

LP24(2)(d) *Proposals within rural areas must provide safe access. It must be demonstrated that such proposals would not cause ~~significant levels of traffic~~ **severe cumulative impacts**, particularly lorries/HGV's on rural roads.*

Question 7.11

- **a) Are the criteria in policy LP25 justified and consistent with national policy? In particular is there robust evidence to justify the targets within the policy and do they take into account viability?**

- 11.01 The policy has been written in compliance with NPPF meeting the challenge of climate change, flooding and coastal change. Both Babergh and Mid Suffolk Councils have also acknowledged climate emergencies in the area and measures required to address these.
- 11.02 Regarding water efficiency targets, the NPPG states that where there is a clear local need, local planning authorities can set out policies requiring new dwellings to meet the optional Building Regulations requirement of 110 litres/person/day¹. The Environment Agency – Water stressed areas ([Document D07](#)) classifies the Anglian Water company area as a serious water stress area. Furthermore, the Councils Water Cycle Study ([Document EE17](#), page 63), states “*there is sufficient evidence to support the adoption of the tighter water efficiency target of 110 l/p/d [litres/person/day] allowed for in building regulations.*”
- 11.03 The energy efficiency target has been set in response to the Written Ministerial Statement from the 25th March 2015, which clearly states Local Planning Authorities were permitted to set their own energy efficiency standards that exceed Building Regulations energy requirements until commencement of amendments to the Planning and Energy Act 2008 in the Deregulation Bill. This was intended to take place alongside the introduction of the zero carbon homes policy in late 2016. The Written Ministerial Statement states that it expected Local Authorities to take this statement of Governments intent into account and to not set conditions above Code for Sustainable Homes Level 4. This equates to around 20% improvement of CO₂ emissions performance above the Target Emission Rate of the 2013 Edition of the 2010 Building Regulations.
- 11.04 In the Government response (2018) to the NPPF it stated Local Authorities are not restricted from requiring energy efficiency standards above Building Regulations standards. The Government’s 25year Environment Plan also seeks new homes to be built in a way that reduces demands on water, energy and material resources.
- 11.05 The Government’s ambition relating to carbon reduction measures are also reflected within the para 148 of the NPPF which requires the planning system

¹ Paragraph: 014 Reference ID: 56-014-20150327

to support the transition to a low carbon future and to contribute to radical reductions in greenhouse gas emissions.

- 11.06 Both Councils are signed up to the Suffolk Emergency Declaration which is committed to reducing their own carbon emissions working towards the aspiration to make the county of Suffolk carbon neutral by 2030.
- 11.07 All policy requirements in the Plan have been reviewed and assessed for viability in the Plan Viability and CIL Review Study ([Document ER02](#)). The specific policy requirements costs are summarised in Table 4-1 (p40) and set out in full at Appendix 1 (97) of [Document ER02](#). Policy LP25 is acknowledged to have a high potential impact upon viability, however reasonable costs have been allowed and must be balanced against the costs of all other policies in the Plan such as the provision of affordable housing. The report shows (Chapter 7, p84 of [Document ER02](#)) the bulk of expected development typologies are viable.

b) Are the requirements of the policy clearly articulated and would the policy be effective?

- 11.08 The Councils consider the policy to be clearly articulated and that it would be effective. However, if the Inspectors consider that greater clarity is required, the Councils would be content to suggest a modification to LP25(3)(f) which may address this point.

Suggested text ref ST14

*LP25(3)(f) ~~Development that incorporates a high level of building materials with low embodied carbon will be encouraged;~~
encourage development to incorporate sustainable building materials; and*

- 11.09 The requirements of the policy are essential to ensuring that the Councils' objectives to address the effects of climate change can be met. A viability assessment ([Document ER02](#)) has been carried out to ensure that the policy requirements (together with other Plan requirements) are deliverable.

Question 7.12

- ***Are the requirements of policy LP26 justified and clearly articulated and would the policy be effective? In particular:***

a) is the requirement to meet Space Standards in the Technical Housing Standards based on robust evidence?



12.01 The Councils believe the policy is clearly articulated and effective.

12.02 As of 30th September 2020, a review by Central Government requires all new homes delivered through permitted development rights to meet the National Described Space Standards. The Viability Assessment ([Document ER02](#)) of the JLP notes that a number of the market units being delivered can be much larger than the minimum space standards but the affordable units are typically in line with them. Therefore, it is considered appropriate to ensure all development is built with guidance on space standards to provide homes with comfortable living accommodation.

b) does the policy need to encourage the use of design codes and use of the Design Review Panel?

12.03 No - Babergh and Mid Suffolk are in partnership with all Suffolk Planning authorities in producing an up to date Suffolk Design interactive website ([Document H05](#)). Suffolk Design is a local authority wide project to embed high quality functional design into developments in Suffolk the initiative aims to ensure good design becomes part of everyone's life. By promoting good practice in design incorporating design principles within the policy the Councils are proactively supporting the Suffolk Design initiative.

c) is 1f consistent with LP06?

12.04 The Councils acknowledge there is a need for compatibility to be addressed. Should the Inspectors be minded to remove LP26(1)(f), the Councils will be content with this.

Suggested text ref ST15

~~LP26(1)(f) 1f. Where relevant and necessary ensure design and amenity accommodates for the ageing population in accordance with M4(2) standards.~~

d) is it sufficiently clear as to when part 2k will be applied?

12.05 The Councils acknowledge that not all proposals/locations will be appropriate for disabled/aging people. Therefore, LP26(2k) incorporates the wording

“where appropriate” to provide flexibility, and allow for applications to be assessed on a case by case basis, depending upon the proposal and location.

Question 7.13

➤ ***Are the requirements of policy LP27 justified and would it be effective?***

13.01 Paragraph 148 of the NPPF states the planning system should support the transition to a low carbon future in a changing climate. Para.151 expands on this by requiring the planning system to help increase the use and supply of renewable and low carbon energy and heat.

13.02 Both Councils are signed up to the Suffolk Emergency Declaration which is committed to reducing their own carbon emissions working towards the aspiration to make the county of Suffolk carbon neutral by 2030. The policy sets out criteria and standards to aid guidance on how these energy proposals will be supported. This is considered to be a justified and effective approach.

13.03 The policy supports renewable, decentralised and community energy generating proposals, subject to a number of criteria. The criteria set out has sought to address all areas identified within the current NPPF, whilst maintaining an open approach to enable a case by case review to reduce unreasonable restrictions. It is therefore considered justified and effective.

Question 7.14

➤ ***Are the requirements of policy LP28 clear and justified?***

14.01 The NPPF (para.149) requires plans to be take a proactive approach to mitigating and adapting to climate change and to take account of long term implications for water supply, amongst other issues. Paragraph 170 requires policies to contribute to and enhance the natural and local environment preventing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of water pollution.

14.02 Policy LP28 has been developed through engagement with the Environment Agency, the water bodies and the Lead Local Flood Authority. With East Anglia being one of the driest parts of the country, these organisations are all involved in an important regional project which seeks to link all aspects of water management known as Holistic Water Management. The Councils believe it is important to ensure that development is compatible with this approach and that steps are made to reduce the impacts of climate change.

14.03 The policy is considered to be clear and justified.



Question 7.15

➤ ***Are the requirements of policy LP29 clear and justified?***

- 15.03 Para. 148 of the NPPF requires plans to support the transition to a low carbon future in a changing climate taking into full account of flood risk. Paragraph 149 requires plans to take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk.
- 15.04 Policy LP29 has been developed through engagement with the Environment Agency, the water bodies and the Lead Local Flood Authority.
- 15.05 In order to improve the clarity of the policy, the Councils have agreed with Suffolk County Council and Anglian Water to propose the following modification:

Suggested text ref ST16

LP29(3) *Mitigation is provided against existing and potential flood risks throughout the life of the development (including fluvial, surface, coastal and sewer flooding) through application of a sequential approach to flood risk, the implementation of Sustainable Drainage Systems (SuDS), and **avoiding or mitigating** risks to ground or surface water quality.*

Suggested text ref ST17

LP29(7) *In circumstances requiring surface water management measures (including rain water harvesting and ~~greywater recycling~~), adequate mitigation which avoids any risks and/or detrimental impacts are provided to the Lead Local Flood Authority.*

Appendix 01

Main issues raised from R19 JLP consultation statement (Ref A06)

SP09 main issue

SP09 – Enhancement and Management of the Environment. Main issue	Council brief response
1. Policy amendment to require HRA under all relevant circumstances.	The Suffolk Coast Recreational Avoidance Mitigation Strategy (RAMS) already establishes mitigation/ projects and contributions required.
2. Need to improve baseline data and availability of data to inform JLP.	See Question 7.1
3. A policy requiring appropriate payment of the Suffolk Coast RAMS tariff should be embedded into the Plan.	Already embedded within policy supporting text and para 2 of SP09.
4. Clarify Zone of Influence and modify map to include Ipswich and East Suffolk.	See question 7.1b.
5. Biodiversity net gain should be targeted to locally relevant, declining habitats and species and which aim to increase connectivity within the wider landscape. A commitment to have both sought and published reports, on specific clearly important areas.	Biodiversity net gain is important to the Councils and a targeted approach may be effective and measurable in achieving goals.
6. Caveat policy for where development proposals cannot protect the networks of habitats, suitable mitigation should be part of the scheme.	This is not considered an appropriate approach.
7. Policy amendment to para 3 to ensure relevant biodiversity projects are incorporated.	Reference to ‘relevant biodiversity projects’ could be considered.
8. Policy amendment to para 3 to clarify the approach.	The Councils consider the policy to be written and worded appropriately.

SP10 main issue

SP10 – Climate Change Main issue	Council brief response
1. Include a statement on what is expected on large developments for climate change.	Policy is applicable to all scales, provision within LP25 and numerous detailed local policies
2. Require developers to build sustainable carbon-neutral housing.	Local Plan policy LP25 and LP27 provides support for decentralisation of energy and low carbon development, no evidence to justify requirement for carbon neutral
3. State measures for carbon storage & map carbon sinks.	Detail is in LP18, LP19 and LP30 & Suffolk Biodiversity Action Plan identifies carbon sinks.



SP10 – Climate Change Main issue	Council brief response
	The Environment and Climate Change Task Force will embed principles within the Suffolk Design Charter.
4. Provide more local guidance in terms of the expectations of the development industry in respect of climate change.	See Question 7.2

LP17 to LP29 main issue

Policy and Main issues	Council brief response
LP17 – Environmental Protection	
1. Object - strategic and housing policies do not give priority to the reuse of brownfield land.	See Question 7.3
2. Should be removed, as could be used as a barrier against sustainable greenfield sites.	
3. Policy should require more than a 'contribution' to making more efficient use or reuse of existing resources.	The Councils consider that the wording is appropriate.
4. Light pollution - Saved BDC Policy EN22 should be reinstated. Current policy fails to reflect NPPF para 180.	The Councils consider that LP17 is appropriate and consistent with national policy.
5. Should be more explicit that impact may be within Ipswich, and that air quality assessments should consider AQMAs within Ipswich.	Policy seeks to prevent, or where not practicable, reduced air pollution. This is relevant to a wider area, including AQMAs both within and outside the Plan area where relevant.
6. Reference to 'National and International Standards' is required through a footnote or reference.	Considered that the policy is appropriately worded and is to be read in conjunction with legislation and guidance. See question 7.3
7. Remove requirement to 'enhance' groundwater, surface water features etc.	The Councils consider that it is appropriate to include 'enhancement' within the policy, as some watercourses have been identified as being of poor quality (see Question 7.3)
8. Policy should refer to the requirement for waste management plans for new developments and include consideration of cumulative impacts.	Accreditation to BREEAM Standards within LP25, addressed construction and operational waste.
9. would like to see proactive measures to ensure that legally binding targets on biodiversity, air quality, water, and resource and waste efficiency are not only achievable but also can be surpassed.	JLP policies set out a package of environmental measures which do not act as a ceiling. JLP monitoring will review the effectiveness of the plan over its lifetime.
LP18 – Biodiversity and Geodiversity	



Policy and Main issues	Council brief response
1. Not consistent with NPPF as it places enhancing habitats as the first step.	The Councils propose a modification to comply with the NPPF (see question 7.4). County Wildlife Sites are included within the Policy. See question 7.4.
2. For clarity policy should state that locally designated sites such as County Wildlife Sites are included	
3. County Wildlife Sites should be mapped and safeguarded.	
4. Request explicit reference to the need for biodiversity enhancements to be targeted at locally relevant, declining habitats and species.	Biodiversity net gain is important to the Councils and a targeted approach may be effective and measurable in achieving goals.
5. Enhancements for biodiversity should be on the basis of an up to date Ecological Appraisal and relate to the site, rather than scale of development.	Noted. It is considered that the wording for 18c) is appropriate.
6. Remove requirement for 10% biodiversity net gain, as Environment Bill has not passed through Parliament. Would be NPPF compliant if specific percentage requirement was removed.	The Councils are taking a proactive approach in line with NPPF Para 170 a) and the emerging Environment Bill (see question 7.4).
7. Net gain must be set at 20%.	
8. 10% net gain will not alone justify greenfield developments and should be part of a hierarchy of safeguards.	
9. Give clear indication as what potential uses of the Metric could be and make clear that off-site compensation could never be the main option considered.	The metric used will be in line with current practice and or as identified within the Environment Bill (see question 7.4).
10. Off-site offsetting must be situated close to the development site.	Noted. Agree in principle that it should be on the most locally appropriate area.
11. need to state that 'biodiversity offsetting' will be an exceptional step.	Provision within policy to ensure Biodiversity Hierarchy
12. Remove part 2f of the policy, as this is addressed in Part 3 of the policy.	LP18 2f) applies measures to assist recovery of species whereas part 3) refers to where development has potential to have an adverse impact upon protected species therefore the Councils consider the inclusion to be appropriate.
13. Need to proactively map protected areas, wildlife links and stepping stones.	Biodiversity mapping and subsequent net gain is important to the Councils and a targeted approach may be effective and measurable in achieving goals.
14. Insufficient detail about how to ensure environmental corridors will work and should be implemented at every opportunity.	
15. enhancement and management of local networks are likely to fall into multiple landowners, therefore, schemes should only do	

Policy and Main issues	Council brief response
so where possible. 'Local networks of biodiversity' not defined in plan.	
16. Plan needs to be clear that any habitat found to have sensitive species must be left undisturbed and protected.	Noted. Policy aims address habitats and species and require demonstration adherence of the biodiversity hierarchy. Therefore, the Councils consider the wording to be appropriate.
LP19 – Landscape	
1. Modification to background text suggested to strengthen requirements.	The Councils propose a minor modification to paragraph 15.25 of the plan. See question 7.5
2. JLP should retain Visually Important Open Spaces and Special Landscape Area designations, as it is unclear how non designation led approach will be delivered and what criteria will be applied.	The Councils do not consider it appropriate to retain these designations in the JLP (see question 7.5).
3. Policy should include reference to local landscape designations in adopted NPs.	The Councils do not consider it appropriate to refer to Neighbourhood Plans (NPs) as made NPs are part of the Development Plan (see question 7.5).
4. Amend to require a commitment to implement specific landscape mitigation measures identified in the LVIA at the earliest possible opportunity.	The policy is considered appropriate. See question 7.5
LP20 – Area of Outstanding Natural Beauty	
1. Modification requested to background text to refer to Valued Landscapes within AONB Project Areas	The Councils propose a modification to para 15.27 of the JLP (see question 7.6).
2. Policy should be more restrictive and include AONB Project Areas.	Policy is to be read in conjunction with NPPF and has been positively prepared. See Question 7.6
3. Major development should normally be refused in AONBs, as per NPPF.	
4. Require planning applications to be supported by a Landscape and Visual Impact Assessment that identifies the impact of the development on the wider landscape and the Area of Outstanding Natural Beauty.	Noted However, Policy LP20 should be read in conjunction with the other policies of the plan. Policy LP19(2) sets out the Councils expectations
5. Modification requested to conserve the distinctiveness of the AONB and reference to AONB Management Plans	Noted. A modification could address this. See Question 7.6
LP21 – The Historic Environment	
1. Conservation areas should be specifically mentioned.	See Question 7.7
2. Policy should refer to the identification of non-designated heritage assets in NPs.	See Question 7.7

Policy and Main issues	Council brief response
3. Modification requested to clarify that different weight to be granted to impacts on designated and non-designated assets - as per NPPF.	See Question 7.7
4. Para 1 - depending on the nature of the works/development proposed should be removed.	The NPPF requires a proportionate heritage statement. The Councils believe the wording is in line with NPPF requirements.
5. Criteria set for heritage statements is excessive and above NPPF requirements.	Requirements are considered appropriate to understand the potential impact of schemes on the historic environment.
6. Should be expanded to cover full extent of NPPF para 192.	The Councils consider that the policy is compliant with the NPPF and paragraph 192.
7. Re-use of heritage assets should not require compliance with relevant JLP policies.	Provisions of the Planning and Listed Buildings Act apply to all heritage assets
8. Policy should acknowledge that in certain cases, redevelopment within the setting of a heritage asset can be beneficial to the asset and will be supported.	The NPPF sets out the considerations of such cases under paragraph 202 ('enabling development'). It is not considered appropriate to replicate this requirement in policy.
9. Policy is too subjective, provides no locally specific guidance. Needs to respect community values and identify the districts intentions for heritage preservation.	Policy is considered suitable and appropriate. Parishes may wish to establish specific localised/parish level circumstances through Neighbourhood Plans.
LP22 – Change in Land Use for Equestrian or Other Animal/Rural Land Base Uses	
1. Policy should require significant highway impacts to be mitigated and ensure test of highway acceptability is in line with NPPF.	Noted. Wording proposed by SCC is appropriate and in line with NPPF and the main transport JLP policies.
LP23 – Agricultural Land to Residential Garden Land	
1. Policy is unnecessarily onerous and not justified. Should be simplified, with a criteria based policy, taking into account the following considerations: size and scale, the aspect and location of site, presence of landscape features, the extent to which high quality agricultural land would be taken out of productive use.	The policy is considered appropriate and justified.
LP24 – New Agricultural/Rural Buildings in the Countryside	
1. Amend - new agricultural development connected with the poultry industry is that it will follow transport evidence modelled capacity.	A modification is proposed regarding traffic impact – see Question 7.10.
2. Policy should be amended to provide greater clarity as to what evidence and justification is required.	Noted. To be read in conjunction with NPPF paras 77-79 and 83-84, and other policy requirements of the Plan.

Policy and Main issues	Council brief response
3. “significant levels of traffic” is not defined - The policy needs to positively address the issue through measures which manage and mitigate impacts (including cumulative impacts).	A modification is proposed regarding traffic impact – see Question 7.10
4. Does not provide an adequate means to control the development of an increasing number of Intensive Poultry Units.	Policy is considered robust and sound. There are also a number of supporting policies within the JLP to ensure proposals will be considered appropriately eg. CEMP requirements in LP25
5. Does not address cumulative or in combination concerns regarding proliferation and over concentration of IPU's and the resultant growth of HGV traffic on an inadequate rural road network.	
LP25 – Sustainable Construction and Design	
1. Recommended rewording for para 15.53 to acknowledge expiry of zonal charge Anglian Water levy.	Noted and agreed in principle. The Plan could be amended for this.
2. Amend wording to say "encouraged" not "required."	The Councils consider that the wording is appropriate and is fundamental to achieving the objectives for climate change etc.
3. Basic renewable energy generation systems should be mandatory, not just encouraged.	The Councils consider that the wording is appropriate and flexible to allow for innovation
4. Not considered appropriate for the Councils to set different targets or policies outside of the Building Regs.	Written Ministerial Statements and NPPF allows for local plans to set different standards. See Question 7.11
5. The policy should require compliance with Future Homes Standard and reject gas heating.	Future Homes Standard is currently out to consultation and is expected to be implemented through the Building Regulations. The policy does require contributions to lowering CO2.
6. The concept of 'consequential improvement' should be included.	This is outside the remit of the Local Plan - required by regulation 28 of the Building Regulations
7. Does not go far enough to achieve the vision of a carbon neutral borough by 2030.	The Plan encourages the move to environmental improvement and gain. However, the policies must also have regard to social and economic objectives and be viable.
8. Amend para 2f to add - High embodied carbon (e.g. timber) will be encouraged.	The Councils have proposed to simplify interpretation of policy LP25 by amending 3f) to ensure development incorporates sustainable building materials will be encouraged . see question 7.11b)
9. "Policy part 3 should be reduced to apply to 10 or more dwellings and to comply with current Building Regs on reduction of CO2	The rewording would not achieve Councils vision for a low carbon future.



Policy and Main issues	Council brief response
emissions, water and energy efficiency standards.”	
10. Object to the requirements in this policy to deliver energy and water savings above current Building Regulations without adequate justification.	The Councils believe the Policy is justified. See Question 7.11
11. Not clear who is responsible for encouraging the water efficiency target and further clarity should be provided.	
12. Clarification of water efficiency standard required.	
13. Policy amendment - remove para 6 and retain supporting text para 15.53.	Noted however para 6 is to be retained as it encourages greater water efficiency
14. Criteria 3a) and 3b) to only be applicable to major development and reduce the standards being sort throughout the rest of the criteria.	The rewording would not achieve Councils vision for a low carbon future.
15. A full Sustainability Design and Construction Statement should not be required at the early stages of a planning application, where matters are reserved for future determination. The wording of the Policy should be amended to reflect this.	Discussion and consideration of sustainable design and construction issues should take place at the earliest possible stage in the development process. This will provide the greatest opportunities for a well-designed and constructed development and at the same time enable costs to be minimised.
16. Highest BREEAM standard should be required.	The policy requires a minimum of "very good" further standards must be subject to viability testing. The Councils consider that this is appropriate.
17. Amend para 6 - Delete 'wherever feasible'.	The Councils consider that the wording is appropriate.
18. para 3c) needs to be split into two parts.	Noted. This may improve clarity.
19. A specific commitment should stipulate high quality fibre optic broadband as provision for any development. Adequate provision for future development should also provide and empower citizens to participate in active travel.	Addressed in Infrastructure matters.
LP26 – Design and Residential Amenity	
1. NPs have design codes and policy should ensure these are used in determining planning applications. No recognition of NP's design work.	Made Neighbourhood Plans are part of the development plan. Neighbourhood Plans are referenced within part 3 of the policy.
2. Should encourage Design Codes, with larger schemes reviewed by an Independent Design Review Panel.	See question 7.12 above.
3. No reference to enhancing the existing character and context.	Noted. The policy should read alongside NPPF para 130 and is considered appropriate.

Policy and Main issues	Council brief response
4. Consideration should be given to a requirement for dwellings to incorporate live/work spaces, to reduce the need to commute.	A suitable mix of dwellings will be required on a case by case basis. Policies of the plan overall seek to reduce the need to travel, such as the locations of growth and transport mitigation – also see question 6.3c (Matter 6).
5. If natural features such as trees/hedgerows are lost they should be replaced.	Criteria 2c seeks to protect and retain these features. Policy should be read in conjunction with the other policies of the plan.
6. 2e - 'exceptional design' and 'sensitive area / landscape' need to be defined. Requiring developments of all scale to do this is onerous.	Noted. The policy should read alongside LP19 and NPPF para 79 and is considered appropriate.
7. No evidence to justify space standards.	See question 7.12
8. Clarity required on term 'where appropriate' in part 2 (k).	The policy is written in a flexible manner – see question 7.12.
9. M4(2) requirement is within other policies, not clear what schemes criteria would apply to.	The Councils propose a modification to remove LP26(1)(f) see question 7.12.
10. This policy offers more flexibility than LP06. This part should be retained and LP06 requirement removed.	
11. Remove last sentence of part 3 of the policy as maintain and improve are two different requirements.	Noted. The Councils consider the policy to be justified and effective.
LP27 – Energy Sources, Storage and Distribution	
1. Remove part 2 of the policy.	The Councils consider that the wording in policy is sound, justified and clear and is supported by the other JLP policies – see question 7.13
2. Part 1, the current wording dealing with impact fails to consider avoidance of harm and therefore needs to be revised.	
LP28 – Water resources and infrastructure	
1. Amend part 1 for clarification regarding appropriate water efficiency measures.	Wording is considered appropriate. Policy has been developed through engagement with Environment Agency, water bodies and the Lead Local Authority – see question 7.14.
2. Amend part 1 to not require conformity.	
3. Part 3 is not considered justified as it duplicates other legislation.	
4. Propose listing of specific recycling measures.	The Councils consider that the wording is appropriate. Measures would be considered on relevant technologies.
LP29 – Flood Risk and Vulnerability	
1. Remove reference to grey water recycling from point 7.	Modification proposed – see answer to question 7.15
2. Amend part 4 to include discussion with relevant drainage authority. Amend part 5 to delete considerations for cumulative impacts.	Policy is considered suitable. Cumulative impacts are an important factor that needs to be taken into consideration.

Policy and Main issues	Council brief response
3. Policy requires clarification for minor development and the LLFA.	Policy has been developed through engagement with the Environment Agency, the water bodies and the Lead Local Flood Authority.
4. Policy amendment to part 3 to clarify avoiding and mitigating risks for SuDS.	Modification proposed – see response to question 7.15.
5. Overlap between LP29 and LA078 part IX. - Requests IX to be removed from LA078, no amendments to LP29 requested.	Policy LP29 is considered appropriate. Site specific matters to be addressed in Matter 9.

Appendix 02

Babergh and Mid Suffolk District Councils' Biodiversity Task Force Terms of Reference

Babergh & Mid Suffolk District Councils' Biodiversity

Task Force Terms of Reference

1. Title of Task Force

Babergh & Mid Suffolk District Councils' (BMSDC) Biodiversity Task Force.

2. Purpose

The Task Force has been convened in response to biodiversity motions passed by both Councils in 2019. Its role is to make recommendations to Cabinet(s) on opportunities and actions to protect and improve biodiversity, both in the way in which the Councils jointly carry out their own operations and initiatives, and through partnership working. Both Babergh and Mid Suffolk District Councils recognise that there is an urgent need for action.

Mid Suffolk – The council pledges that:

- 1. a task force reviews recognised and potential wildlife corridors in the District, and brings forward proposals to enhance these corridors.*
- 2. additional arboricultural and bio-diversity advisory resources are made available, as necessary, to:*
 - Support the task force*
 - Provide more input to support planning officers*
 - Strengthen the role of public realm team*
 - Provide advice to parishes and other community landowners.*
- 3. additional resources and biodiversity proposals during 2019/20 would need to be funded from the Growth and Efficiency Fund and then considered in preparing the budget for future years*

Babergh – The council pledges that:

- 1. Creation and development of a Wildlife Network Map from which Wildlife Corridors will be identified and created. The map, available to the public, will assist the District to develop Eco Tourism, thereby attracting much needed tourist revenue to the region.*
- 2. As part of our commitment to Biodiversity the Council will work closely with our existing Partners, the County Council and other NGO's involved in protecting our natural habitats.*
- 3. Introduction of the 'Trees for Life' scheme in Babergh District. This offers every family with a new-born baby a tree to plant. The trees to be planted will be native trees and will be locally grown and sourced.*
- 4. That additional biodiversity resources be provided as necessary, to:*
 - Support the Task Force*



- *Provide more input to support planning officers*
 - *Strengthen the role of public realm team*
 - *Provide advice to parishes and other community landowners*
5. *Any funding to maintain and improve the biodiversity of our area for 2019/20 will be recommended to Cabinet for approval. The task force would recommend the amount to be spent in future years in a report back to Cabinet by March 2020.*

3. Rationale

The Councils along with Suffolk County Council and other local authorities recognise the need to act decisively to respond to the commitments they have made. One of the first steps must be to ensure that there is clarity about the current position and to understand where the most potential lies for improvement. This will enable resources to be prioritised to achieve maximum benefit. Further work, beyond the scope and term of this Task Force, will be required with partner organisations to improve biodiversity across Suffolk.

4. B&MSDC Priorities

The work of the Task Force provides the opportunity to contribute to all priority areas of the Corporate Plan:

- Economy
- Housing
- Communities
- Customers
- Environment
- Wellbeing

5. Sponsoring Cabinet Members and joint Chair of the Task Force

Councillor Elisabeth Malvisi
Councillor Jessica Fleming

6. Task Force Members

There will be three seats available on the Task Force for each Council additional to the cabinet members of each Council. These seats will be filled by invitation from the Chair only.

7. Lead Officer

Cassandra Clements - Assistant Director of Environment & Commercial Partnerships

8. Supporting Officers

Nominated officers from Countryside and Public Realm, Law and Governance and Strategic Planning teams.

9. Short description of issues to be covered

Meetings to cover (subject to amendment by the Task Force):



- Biodiversity mapping
- Management of the public realm, council-owned land and roadside verges - managing for the benefit of biodiversity
- Protecting and enhancing biodiversity in planning and development
- Encouraging biodiversity on agricultural and private land
- Consideration of proposals for Cabinet.

10. Outcome

Recommended actions to avoid biodiversity loss, conserve and enhance existing habitats and species and achieve biodiversity net gain.

11. Outline Timescale

- Meetings to cover the issues shown in 9. above commencing July 2020 and completing by mid-September 2020.
- Presentation to Cabinet for approval in October 2020.

The Chairman and Supporting/Lead Officers may choose to set up a task and finish group to address specific areas of work. The composition of any such group would be at the respective Chairman's discretion and may involve members outside of the Task Force. The Chairman and Supporting/ Lead Officer may invite guest speakers and/ or third parties to widen the expertise and advice available to the Task Force as the work of the group dictates. The Chairman and Supporting/Lead Officers must ensure the Panel adheres to all relevant dates in respect of submitting reports to Cabinet. This will include a date for Cabinet briefing of the draft final report and deadline for submission of the final report to Democratic Services. It will also include submission of the Key Decision Forward Plan Request.

12. Details of other parties that may be involved

- Suffolk Wildlife Trust
- Essex County Council – Place Services

