

Planning Applications and New Validation Criteria

On behalf of the Suffolk Biodiversity Partnership, I am very pleased to see the inclusion of Biodiversity survey and report included in Ipswich BC's 1App Local Validation Requirements for planning and related matters. I have the following comments to make on the text and the related Ipswich BC website:

1. Biodiversity survey and report

- I welcome the phrase "all Biodiversity Action Plan priority species and habitats" as this will ensure compliance with planning policy and the biodiversity duty under the Natural Environment and Communities Act 2006.
- To assist applicants, I suggest including the UK and Suffolk Biodiversity Action Plans in the source column for Biodiversity data in Appendix 1 (Information required to validate planning applications, in addition to standard national requirements). A hyperlink to the Suffolk Biodiversity Partnership on the SCC website would be useful - www.suffolk.gov.uk/Environment/Biodiversity; I would ask however that the latter is labelled as such rather than just Suffolk County Council.
- The reference to the EC Habitat Directive should be the Conservation (Natural Habitats &c.) Regulations 1994 as amended in 2007 (often referred to as the Habitat Regs).

2. Biological records

The inclusion of Suffolk Biological Records Centre in Appendix 1 sources for biodiversity data would be appreciated. It has deliberately been set up and run as a source of independent validated biological information including the distribution of habitats and species in Suffolk but not ecological advice.

3. Designated Wildlife Sites

There is likely to be some confusion regarding the phrase "designated wildlife sites and other sites of known biodiversity interest". PPS9 uses the phrase Local Wildlife Sites to indicate sites of a county or regional value for biodiversity. The text here should therefore give an explanation and definitions of designations used in Suffolk. The link here gives information on County Wildlife Sites - www.suffolk.gov.uk/Environment/Biodiversity/CountyWildlifeSites.htm . For Sites of Special Scientific Interest (SSSIs) applicants should be referred to Natural England.

4. Prior Notification (demolition)

I would suggest that Biodiversity survey and report is included in the list of requirements for demolition of buildings as this should ensure Protected and Priority Species are fully considered.

5. Criteria and Thresholds for survey and assessment

- I strongly recommend the inclusion of the Suffolk version of tables produced by the Association of Local Government Ecologists (ALGE) and Figure 2 ecological survey seasons. These have been tailored to meet the local needs and thus would be considered to be reasonable.
- I attach the Suffolk version of the ALGE tables (as updated and adopted recently by Suffolk County Council after consultation) for your information.

6. Webpage for 1APP

- Based on the experience of the past 6 months, I recommend a section "Where to find supplementary information" with the inclusion of details of ecological consultants for developers e.g. Institute of Ecologist and Environmental Managers www.ieem.org.uk and Environmental Data Services www.endsdirectory.com
- I would also welcome hyperlinks to SBRC, SWT, Natural England and the Biodiversity Partnership on the SCC website; I would ask however that the latter is labelled as such rather than just Suffolk County Council.

7. Opportunities for biodiversity

I would welcome a statement that all applications should consider opportunities that would enhance, restore or add to the biodiversity features. This would send a message that these features should be protected and viewed as assets.