

# Ipswich Borough Council Local Plan

## Examination of Core Strategy and Policies Development Plan Document Review and Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document

### Stage 2 Matters and Questions - Response to Matter 8 Heritage, Design and the Natural Environment

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## **Matter 8 – Heritage, Design and the Natural Environment (Policies CS4, DM5, DM6, DM7, DM8, DM9, DM10, DM28, DM31, DM33, DM34)**

**8.1 Are the policies (listed above) in connection with heritage, design and the natural environment soundly-based? If you contend that they are not how should they be modified?**

### **Heritage and Design (CS4 and DM5 to DM9)**

#### Consistency with national policy

1. The statutory framework is contained in the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990.
2. National policy is contained in the National Planning Policy Framework (NPPF)<sup>1</sup> with supporting guidance within the PPG.
3. Page 16 of the Council's Soundness Self-Assessment Checklist<sup>2</sup> explains how policies CS2, DM5 and DM6 comply with paragraphs 56-68 of the NPPF. Page 24 of the Council's Self-Assessment Checklist explains how policies CS4, DM8 and DM9 comply with paragraphs 126-141 of the NPPF.
4. In relation to accessible dwellings, the NPPF states that planning authorities should 'plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own home).' (paragraph 50). The March 2015 Planning Update Ministerial Statement introduced new optional technical standards relating to accessible dwellings. The standards are set out in the Building Regulations and can be required through planning policy. The national Planning Practice Guidance states that 'Where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to Requirement M4(2) and / or M4(3) of the optional requirements in the Building Regulations.'

#### Positively Prepared

5. The Core Strategy will help to deliver the Vision and Strategic Objectives. An integral part of the strategy is to reinforce the high quality urban and historic built environment and setting of Ipswich protecting the Borough's heritage assets including listed buildings, conservation areas, registered historic parks and ancient monuments.
6. Policies DM5, and DM6 provide an effective framework to facilitate high quality and inclusive design, supplemented by policy DM8 (Heritage Assets and Conservation) and policy DM9 (Buildings of Townscape Interest) where necessary. These policies are supported by detailed guidance such as the Local List (Buildings of Townscape Interest) Supplementary Planning Document (SPD)<sup>3</sup>, Space and Design Guidelines SPD<sup>4</sup> and the Ipswich Urban Character SPD<sup>5</sup>, which assesses the significance of the townscape

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<sup>1</sup> CLG, 2015, *National Planning Policy Framework*, CDL reference NCD18

<sup>2</sup> Ipswich Borough Council, 2015, *Soundness Self-Assessment Checklist*, CDL reference SUCD23

<sup>3</sup> IBC, 2014, *Local List (Buildings of Townscape Interest) Supplementary Planning Document*, CDL reference ICD61

<sup>4</sup> IBC, 2015, *Space and Design Guidelines SPD*, CDL reference ICD31

<sup>5</sup> IBC, 2015, *Ipswich Urban Character SPD*, CDL reference ICD62

character of the town excluding the conservation areas which are already covered by detailed character appraisals.

7. The Core Strategy promotes development which is well designed and respects the town's important heritage assets, some of which are of national importance. Through site sheets provided with the site allocations as Appendix 3A to the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document<sup>6</sup>, developers are provided with clear information on the nature of the heritage assets within and adjacent to the site and the potential archaeological interest.
8. Whilst the standards relating to accessible dwellings are optional and were introduced after the Council has published its Local Plan under Regulation 19, the Council has positively sought to establish whether there would be any merit in setting the requirement for Ipswich Borough. The Council has liaised with Suffolk County Council, in terms of their responsibility for care services, in identifying relevant evidence and setting the requirement.

### Justified

9. Core Strategy policies should not repeat national guidance and it is considered that policy CS4 gives a good indication of what Ipswich wants to achieve, in balancing protection of existing heritage assets with opportunities to encourage high quality design to create distinctive and attractive places.
10. The core design policy is DM5 (Design and Character) which provides a comprehensive schedule of urban design criteria that new development will be expected to meet with a view to achieving the high quality and inclusive design that will improve the character and quality of an area required by the NPPF. In relation to accessible dwellings, the Council's Background to the Requirement for Adaptable and Accessible Dwellings paper<sup>7</sup> explains the rationale behind setting the requirement.
11. Policy DM6 (Tall Buildings) has been included as significant development pressure for tall buildings in the waterfront area of the town has been experienced in recent years. The policy elaborates on the design criteria set out in the English Heritage / CABE 'Guidance on Tall Buildings' 2007<sup>8</sup> and broadly defines the zone in which tall buildings may be considered acceptable.
12. The Council considers that the Core Strategy deals adequately with the historic environment. The Core Strategy recognises the built heritage of Ipswich and the part it plays in defining the distinctive character and identity of the town. This includes the 15 Conservation Areas, the 620 listed buildings; two parks and one cemetery on the National Register of Historic Parks & Gardens; 10 scheduled monuments and an area of archaeological importance.
13. Policies DM5, DM6, DM8 and DM9 are robust in ensuring that the expected high levels of development expected within IP-One area of new development will make a positive contribution to the character and distinctiveness of Ipswich and protect and enhance the high concentration of heritage assets within the area.

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<sup>6</sup> Ipswich Borough Council, 2014, *Proposed Submission Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document*, CDL reference SUCD3

<sup>7</sup> Ipswich Borough Council, 2015, *Background to the Requirement for Adaptable and Accessible Dwellings*, CDL reference LPCD51

<sup>8</sup> CABE, 2007, *Guidance on Tall Buildings*, CDL reference NCD41

14. Alternatives considered e.g. through sustainability appraisal process (SA Report para 4.32) considered no policy option against CS4, but it performed less well because there would be fewer opportunities for providing control and direction, lower environmental standards and fewer opportunities for enhancement and regeneration.
15. The Council proposed Pre-Submission Main Modifications to CS4, DM8, to better ensure that the policies reflect the NPPF, address all aspects of heritage and will be effective. It also proposed Pre-Submission Additional Modifications to references to heritage assets in certain site sheets, for purposes of clarity and completeness.
16. Following consultation on the Pre-Submission Modifications October-November 2015, further discussions have taken place with Historic England and Suffolk County Council Archaeology Service. A Statement of Common Ground between Ipswich Borough Council, Historic England and Suffolk County Council Archaeology Service, proposing further amendments to heritage aspects of the plan including policies CS4 and DM8 and certain site sheets, to resolve outstanding objections, is close to being signed. The Council expects to submit the signed agreement early next week.
17. The Council also wishes to promote updates to other of the site sheets where minor updates in relation to archaeology have been advised by the County Archaeology Service. These are attached as Appendix 1 and are out with the scope of the Statement of Common Ground.
18. Scheduled monuments in central Ipswich are currently under review by the Secretary of State. If boundaries are amended, the IP-One Inset Policies Map will need to be updated.

#### Effective

19. The adopted versions of these policies have ensured that the majority of the Borough's heritage assets are in good condition with only six listed buildings on the Building's at Risk register. No designated heritage assets have been demolished since 1992.
20. CS4 has been frequently used 120 times in decision making, DM5 634 times and DM8 74 times within the last year.
21. DM6, Tall Buildings – No applications whereby consideration of tall buildings was needed were considered during 2014/15. However the policy remains relevant should any applications for tall buildings be submitted.
22. DM9, Buildings of Townscape Interest – This has not been used but remains relevant due to the number of buildings of townscape importance as detailed in the Local List SPD.
23. In relation to accessible dwellings the Council's Background to the Requirement for Adaptable and Accessible Dwellings paper<sup>9</sup> explains the requirement in relation to the Whole Plan Viability Report, the production of which preceded the Government's introduction of the optional standard for accessible dwellings. It is considered that, due to the withdrawal of the Code for Sustainable Homes, the requirement will not have an impact on viability. The policy is likely to be more effective than the adopted policy DM5 which, whilst requiring buildings to be 'designed for long life by being capable of

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<sup>9</sup> Ipswich Borough Council, 2015, *Background to the Requirement for Adaptable and Accessible Dwellings and Wheelchair User Dwellings (Policy DM5)*, CDL reference LPCD51

adaptation to accommodate changing needs and uses over time', does not set specific requirements and can therefore be open to interpretation.

## **Natural Environment (CS4 and DM10, DM28, DM31, DM33 and DM34)**

### Consistency with national policy

24. The Council has a duty under section 40 of the Natural Environment and Rural Communities Act 2006 to have regard to conserving biodiversity as part of its policy or decision making. This has been considered through plan preparation, for example a Wildlife Audit Update was prepared 2012-13<sup>10</sup> to provide up to date information about habitats and species across the Borough including on development sites. The natural environment policies of the plan will also support the Council in meeting the Biodiversity Duty through the development management process.
25. The NPPF also sets out national planning policy for the natural environment. Pages 23 and 24 of the Council's Soundness Self-Assessment Checklist explain how policies CS4, DM31, DM33 and DM34 comply with paragraphs 109 to 125 of the NPPF. There is further specific reference below to how the natural environment policies of the plan respond to the requirements of the NPPF.

### Positively Prepared

26. The Council's spatial strategy set out in policies CS2 and CS4 provides for development in sustainable locations, alongside protecting the Borough's natural assets. The development management policies for the protection of biodiversity, trees, open space, green corridors and countryside from inappropriate development support the implementation of that strategy.

### Justified

27. The Borough's natural environment assets are listed in the Core Strategy paragraph 8.42 and include sites designated internationally and nationally for their wildlife or geological interest, in addition to more locally significant sites.
28. The adopted Core Strategy 2011 relied on Planning Policy Statement 9 (PPS9) which set out in detail the approach to planning for sites of international and national biodiversity importance and of geological importance, rather than repeating its provisions in the plan. Thus policy CS4 referred to PPS9 and also included a requirement for development to make provision for local biodiversity and geodiversity. The detailed development management policy DM31 set out the approach to county-wide and locally designated sites, species and habitats.
29. Following the replacement of PPS9 with the NPPF in 2012, the local plan policy approach has been reviewed. The NPPF includes a requirement for criteria based policies against which to assess development applications affecting wildlife or geodiversity sites (paragraph 113), and the requirement for local planning authorities to: '... set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure' (paragraph 114).

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<sup>10</sup> SWT, 2012-13, *Ipswich Wildlife Audit*, CDL reference ICD24

30. The Council published an Open Space and Biodiversity Policy<sup>11</sup> in 2013 and updated the Ipswich Wildlife Audit 2012-13<sup>12</sup>. Work was also undertaken to identify an ecological network across Ipswich, illustrated in Plan 5<sup>13</sup>. It identifies core areas linked by corridors, all of which include buffer areas. The core areas equate to sites with high conservation value including the designated wildlife sites (ranks 1 and 2), medium conservation value (ranks 3 and 4) and low conservation value (ranks 5 and 6) and include some proposed development sites with medium value or below. The linking corridors include single features, such as the railways, but also private gardens, which in an urban context make an important contribution to supporting biodiversity. Aspirational corridor links are also identified to help identify where additional links would be valuable, should the opportunity arise to create them. Appendix 2 provides the background to the identification of the Ipswich ecological network.
31. The Council's Parks Service has produced an 'Ipswich Wildlife Network' leaflet<sup>14</sup> and is using the network approach to prioritise work programmes and public awareness raising activities. The Council has also adopted a Space and Design Guidelines SPD<sup>15</sup>, which provides advice in relation to new development and wildlife, such as the need for permeable fencing for wildlife.
32. Policy CS4 has therefore been revised in order to update references to national policy and:
- Add a new clause a. which refers to the appropriate level of protection for international sites (with a proposed Pre-Submission Main Modification to add reference to protected and priority species also);
  - Add reference to increasing the Borough's tree canopy cover target<sup>16</sup> to 22% by 2050 into clause b. (in 2013 it was 12%), responding to the Open Space and Biodiversity Policy; and
  - Add reference to an Ipswich ecological network to clause f.
33. Policy DM31 has been extensively re-written. Criteria have been introduced for the consideration of development proposals affecting a Site of Special Scientific Interest. The policy now reflects the ecological network approach and the level of protection applied varies appropriately according to the biodiversity value of the site. The Council accepts that as local planning authority it may have limited or no direct control over some aspects of the network, for example the management of the railway corridors or private gardens. However, it is considered that the comprehensive approach adopted which combines land use policies, the management of public open spaces, and environmental education activities undertaken by the ranger service proactively addresses the Biodiversity Duty.
34. In relation to trees, policy DM10 has been strengthened, in recognition of the importance of trees to the urban environment for townscape, biodiversity, air quality, climate change mitigation, health and other benefits (see Open Space and Biodiversity Policy<sup>17</sup>). A new opening sentence to DM10 refers to canopy cover and recognises the biodiversity role of trees. New criteria c., d. and e. have been added to the policy to again refer to the canopy cover target and also to veteran trees and tree management, to ensure

<sup>11</sup> IBC, 2013, *Open Space and Biodiversity Policy*, CDL reference ICD23

<sup>12</sup> SWT, 2012-13, *Ipswich Wildlife Audit*, CDL reference ICD24

<sup>13</sup> IBC, IBC, 2015, *Proposed Submission Local Plan Policies Maps and Plans 1-6*, CDL reference SUCD7

<sup>14</sup> IBC, 2015, *Ipswich Ecological Network leaflet*, CDL reference ICD83

<sup>15</sup> IBC, 2015, *Space and Design Guidelines SPD*, CDL reference ICD31

<sup>16</sup> IBC, 2013, *Open Space and Biodiversity Policy*, CDL reference ICD23

<sup>17</sup> See footnote 14

appropriate protection. A new sentence added to the end of the policy requires design to have regard to the setting of protected trees and the integration of landscaping and tree planting into new development. Policy DM10 complies with paragraph 118 of the NPPF, which requires the protection of ancient woodlands and veteran and aged trees.

35. Ipswich has a rich resource of open spaces, sport and recreation facilities, which contribute in significant ways to the town's well-being (section 6, Open Space and Biodiversity Policy<sup>18</sup>). Their distribution is shown on the policies maps<sup>19</sup>. Paragraph 74 of the NPPF calls for such facilities to be protected from development unless certain criteria are met. Policy DM28 sets out the criteria against which applications for development would be considered.
36. Policy DM33 Green Corridors focuses on establishing green corridors for use by people as well as wildlife. The distinction is important, as the wildlife corridors include features such as the railway embankments and cuttings. Whilst they provide a very valuable resource for wildlife, not all the wildlife corridors are appropriate for people to use. However, it mirrors the approach to wildlife corridors by linking open spaces where possible into a network of green infrastructure, as required by the NPPF paragraph 114. The river corridor is a particularly important corridor through Ipswich. For example, it provides a primary opportunity to establish an off-road cycle route through the Borough<sup>20</sup> (the Gipping Corridor). The green corridors and open spaces also have an important role to play in health and well-being and link into many of the priority areas identified through the Suffolk Health and Well-Being Strategy<sup>21</sup>, such as increasing levels of physical activity, and creating an environment in which people can make healthy choices.
37. The administrative boundary of Ipswich is drawn tightly, to the extent that not all of the town falls within the Borough. However, there are some areas at the periphery of the Borough identified as countryside on the policies map, including a small area which falls within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty. Policy DM34 sets out the policy approach that would apply within these areas. It complies with the NPPF, specifically paragraph 28 on businesses within the countryside, 55 on housing, 112 on the best and most versatile agricultural land and 116 on the Area of Outstanding Natural Beauty. The countryside provides an attractive setting for the town and helps to maintain the identity of adjacent villages, such as Rushmere and Bramford. Pre-Submission main Modifications to the policy have been proposed to ensure its accordance with the NPPF.

### Effective

38. The Authority Monitoring Report<sup>22</sup> 2015 indicates that the adopted policies for biodiversity and trees are well used through the development management process. Checking how frequently the policies have been referred to in reports to the Planning and Development Committee reveals that CS4: 'Protecting our Assets' was used 120 times; DM10: 'Protection of Trees and Hedgerows' was used 159 times; and DM31 Conserving Local Natural and Geological Interest was used 34 times. The Authority Monitoring Report also under Objective 8 monitors how the area of protected habitat has changed; over the last year, it has expanded in Ipswich by 31.1ha as a result of an extended County Wildlife Site.

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<sup>18</sup> See footnote 15

<sup>19</sup> IBC, 2015, *Proposed Submission Local Plan Policies Maps*, CDL references SUCD7 and 8

<sup>20</sup> IBC, 2015, *Draft Cycling Strategy for Ipswich*, CDL reference ICD30

<sup>21</sup> SCC, 2015, *Joint Health and Well-Being Strategy for Suffolk*, CDL reference SCD22

<sup>22</sup> IBC, 2015, *Authority Monitoring Report 2014-15*, CDL reference ICD03a

39. As policy DM31 is substantially new, it is yet to be seen how effective the ecological corridor approach will prove to be in strengthening biodiversity across Ipswich. The Council considers that with the appropriate land use policies and SPD guidance in place, management measures for the Council's own parks, and 'softer' initiatives, such as events in the Borough's parks which focus on wildlife-friendly gardening, the biodiversity of the Borough should be enhanced. Monitoring will continue.
40. Adopted policy DM28 has been in operation for five years and has proved effective in protecting the Borough's open spaces and sport and recreation facilities. The policy was used three times over the last twelve months<sup>23</sup>.
41. The green corridors policy is a new policy in the Core Strategy, but continues an approach established through the 1997 Ipswich Local Plan<sup>24</sup> (policies NE3 and 4). The Authority Monitoring Report from 2011-12<sup>25</sup>, the last year in which the use of the 1997 Local Plan policies was reported, shows that policies NE3 and NE4 were still being used in development management at that time (twice and seven times respectively).
42. Policy DM34 sets out clear criteria for development in the countryside and therefore the Council considers that it will be effective. The 1997 Local Plan set out the approach to maintain separation between Ipswich and villages close to its boundary and it has proved to be effective, for example through guiding the conceptual framework set out in the Ipswich Garden Suburb Supplementary Planning document<sup>26</sup>.
43. The Council, therefore, concludes that the Heritage, Design and the Natural Environment policies are soundly based.

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<sup>23</sup> See footnote 17

<sup>24</sup> IBC, 1997, *Ipswich Local Plan*, CDL reference LPCD01

<sup>25</sup> IBC, 2012, *Authority Monitoring Report 2011-12*, CDL reference ICD03c

<sup>26</sup> IBC, 2014, *Ipswich Garden Suburb SPD Interim Guidance*, CDL reference ICD55



## Appendix 1 Archaeology revisions to site sheets proposed by Ipswich Borough Council

Double strike through or double underline indicate the changes proposed.

### IP005 Former Took's Bakery, Old Norwich Road

In terms of archaeology, the site lies on high ground above the Gipping Valley. The adjacent site IP032 ~~this site~~ has been subject to geophysical survey and a desk based assessment has been carried out for both sites. There is potential for remains of multiple periods on the site and trenched evaluation will be required. ~~evaluated and features of prehistoric and Roman date were identified over much of the site in the form of pits and boundary ditches. There is a need for archaeological excavation.~~ There is no objection in principle to development but any permission will require a condition relating to archaeological investigation.

### IP032 King George V Field, Old Norwich Road

In terms of archaeology, the site lies on high ground above the Gipping Valley. It ~~this site~~ has been subject to geophysical survey and a desk based assessment has been carried out for both this site and the adjacent site IP005. There is potential for remains of multiple periods on the site and trenched evaluation will be required. ~~evaluated and features of prehistoric and Roman date were identified over much of the site in the form of pits and boundary ditches. There is a need for archaeological excavation.~~ ~~This site has been evaluated for archaeology and features of prehistoric and Roman date were identified over much of the site in the form of pits and boundary ditches. There is a need for archaeological excavation.~~ There is no objection in principle to development but any permission will require a condition relating to archaeological investigation.

### IP039a Land between Gower Street & Great Whip Street

In terms of archaeology, the site lies immediately adjacent to a large area of Anglo-Saxon and Medieval occupation at Stoke Quay (IPS 683). There is high potential for Middle Saxon archaeology. Early evaluation is advised. There is no objection in principle to development but any permission will require a condition relating to archaeological investigation. Archaeological costs have the potential to be relatively high.

### IP052 Land between Lower Orwell Street & Star Lane

In terms of archaeology, this site is within the urban core (IPS 413) and close to scheduled areas of Middle Saxon and medieval occupation (SF 189-191). It is within the street pattern area close to the waterfront and is likely to contain complex and important archaeological remains that will involve potentially high excavation costs. ~~There is no objection in principle to development but any permission will require a condition relating to archaeological investigation. Archaeological costs have the potential to be relatively high.~~ Measures for archaeology should be addressed at an appropriate stage in the planning process. Early evaluation is advised so that decisions can be taken on preservation in situ and/or appropriate investigation strategies designed.

### IP055 Crown Car Park, Charles Street

~~The site is within an area of Anglo-Saxon and medieval suburban activity, beyond the early town defences. Geotechnical survey data will inform understanding of the impacts of past landscaping, but this will be heavy across most of the site. In the event that archaeological remains may have~~

~~survived previous landscaping in the southern part of it, consent for development may require a planning condition to secure a programme of targeted archaeological work.~~

#### IP061 School Site, Lavenham Road

In terms of archaeology, this site is in the vicinity of a Bronze Age cremation (IPS017), and Roman and Iron Age finds (IPS 034, IPS 185). It has been subject to geophysical survey and some follow up test pits which identified areas of recent overburden but did not reveal major archaeological features. Trial trenching of this site should be carried out in order to further characterise archaeological remains. Evaluation should be undertaken early in the project management to allow mitigation and investigation strategies to be developed. Sparse remains might be anticipated. ~~Depending on the nature of ground works, a condition may be recommended on any grant of permission to secure a programme of archaeological works.~~

#### IP105 Depot, Beaconsfield Road

This site affects an area of archaeological interest, on land formerly in the low lying plains of the River Gipping. There is potential for palaeo-environmental remains to exist. ~~The likely site of a medieval watermill at Kettlebaston (KBA 014) is indicated by field names and the alignment of the river less than 200m upstream. This shows activity in the area, and Saxon remains were recorded at IPS 395 in a similar topographic location to the site, PDA 250m to the west.~~

#### IP256 Artificial Hockey Pitch, Ipswich Sports Club, Henley Rd

This site lies in the vicinity of Iron Age and Roman sites. ~~There is no archaeological objection in principle to development but any permission will require a condition relating to archaeological investigation.~~ Whilst it remains an area of archaeological potential, given the impacts of previous landscaping there would be no requirement for an archaeological condition or work on this site on the basis that it looks heavily truncated.

## **Appendix 2 Ipswich Ecological (Wildlife) Network**

### **1 Introduction**

- 1.1 This note has been produced to accompany and explain Ipswich's Ecological Network Map. It provides evidence for the Ipswich Local Plan. The Map has several potential uses; in development planning to protect important ecological assets, to target resources towards key areas for maintaining and enhancing the ecological network and to complement existing green infrastructure data.

### **2 What are ecological networks and why are they important?**

- 2.1 Ecological networks have become recognised in the UK as an effective way to maintain and restore connectivity in the landscape and conserve wildlife in areas that have become fragmented due to human activities. National Planning Policy Framework (para 117) states that '*planning policies should: plan for biodiversity at a landscape scale and across local authority boundaries; identify and map components of ecological networks and promote the preservation, restoration and recreation of priority habitats and networks*<sup>2</sup>.
- 2.2 The ecological network identifies ways to create links through all types of environments, enabling species to move between areas and increasing the likelihood of their survival, particularly in respect of climate change and maintaining genetic viability. A strong and effective ecological network also has the added benefit of assisting us in the delivery of ecosystem services, which are of economic and social value.
- 2.3 Ipswich has a range of both statutory and non-statutory sites which help support wildlife. However, it is clear that the designation of a relatively small number of equally relatively small and isolated sites has not protected against a decline in biodiversity. A landscape approach to conserving and enhancing biodiversity is now the recognised approach and the ecological network is one method of recognising and implementing such an approach to nature conservation.
- 2.4 Ecological network maps help locate where the core areas of high quality habitat are and identify aggregations of high quality habitat as well as those which are isolated. In turn this information can be used to focus effort and resources to where they can make the most difference; restoring a core area, creating a corridor or stepping stone between core areas or even the creation of completely new core areas in areas of ecological deprivation.

### **3 Data sets and methodology used to compile the map**

- 3.1 The map was prepared using the currently available ecological data from the Wildlife Audit carried out by Suffolk Wildlife Trust. The decision of which sites to allocate as core areas was made using the ranking system in the audit, namely sites ranked 1-4 (see appendix B). The components of the map closely follow the suggestions made in the 'Making Space for Nature' Lawson review.
- 3.2 The map is a dynamic resource and will be regularly updated whenever further data becomes available, e.g. fresh ecological surveys or species data from Suffolk Biological Information Service. Conserving and enhancing biodiversity is important wherever it is and blank areas on the map do not imply they have no biodiversity interest or value. It should also be appreciated that habitat and species data is never

complete and detail and knowledge may be lacking. Further survey work should be carried out to update data sets, particularly where there are current knowledge gaps.

#### **4 Components of the ecological network**

4.1 Three main categories have been identified, based on the descriptions in the Making Space for Nature, Lawton Review<sup>1</sup>:

**4.2 Core Areas** – Areas of high ecological value which form the heart of the network.

They contain habitats that are rare or important because of the wildlife they support or the ecosystem services they provide. They should be seen as areas where species can thrive and disperse to other parts of the network. They include protected wildlife sites and other semi-natural areas of high ecological quality, including Special Areas of Conservation (SACs), Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs) etc and other areas of high ecological quality, Biodiversity Action Plan (BAP) habitats, Local Wildlife Sites (LWSs) etc. These areas are coloured dark green on the map (Plan 5).

Core areas also contain lower ranked sites with medium (ranked 3-4) or low (ranked 5-6) conservation value.

**4.3 Core Area Buffer Zones** – These surround the core areas and stepping stones and protect them from adverse impacts of the wider environment.

Buffer zones vary in width depending on the type of site and the habitat it contains (International and national sites buffered to 400m and Local Sites and BAP habitats to 100m). These areas are coloured light green on the map.

Opportunities for enhancing the ecological network are to be considered during any local planning within the buffer zones. For example, increased permeability for wildlife in new developments through biodiversity enhancement such as; habitat creation or restoration, wildlife beneficial landscaping, green roofs etc.

The encouragement of voluntary enhancements to the network buffer zones, e.g. residential gardens, school grounds or private businesses, will be led by the Council's Parks & Open Spaces department, for example, wildlife beneficial gardening.

**4.4 Corridors and stepping stones** – Spaces that improve connectivity between core areas, enabling species to move, feed, disperse, migrate or reproduce.

Connectivity need not come from linear, continuous habitats; a number of small sites may act as 'stepping stones' across which certain species can move between core areas. Equally, a land mosaic between sites that allows species to move is effectively an ecological corridor.

Many features act as natural corridors e.g. rivers, hedgerows and even some roadside verges. They are not necessarily linear but may be a number of small sites. They act in a way that connects, complements or conserves core areas. Corridors are treated in the same way as buffer zones during the local planning process.

#### **Appendix A: References**

1. Lawton, J.H., Brotherton, P.N.M., Brown, V.K., Elphick, C., Fitter, A.H., Forshaw,

J., Haddow, R.W., Hilborne, S., Leafe, R.N., Mace, G.M., Southgate, M.P., Sutherland, W.J., Tew, T.E., Varley, J., & Wynne, G.R. (2010) *Making Space for Nature: a review of England's wildlife sites and ecological network*. Report to Defra

2. Department for Communities and Local Government. (2012) National Planning Policy Framework

## **Appendix B: Wildlife Audit ranking system**

A system of ranking each site from the information gathered during surveys was established, using a simple numbering method. Numbers 1-6 were used (1 = high, 6 =low).

1 Statutory designation e.g. SSSI (Site of Special Scientific Interest) scheduled under the Wildlife and Countryside Act 1981.

2 Non-statutory designation e.g. County Wildlife Site (CWS). CWSs are sites regarded as important in a county/regional context.

3 Non-statutory designation e.g. Local Wildlife Site (LWS), Biodiversity Action Plan (BAP) species and habitats (except those that are locally common e.g. song thrush) and/or species protected under the Wildlife and Countryside Act (1981).

4 No designation but clearly of value due to size, connectivity, species diversity, potential for BAP and protected species and locally common BAP and protected species.

5 No designation but has some natural capital: is in character with the area (e.g. woodland), provides limited connectivity.

6 No designation and of no conservation value.

**Site Ranking 1:** Sites of Special Scientific Interest (SSSIs): the most important sites for wildlife within a national context. The criterion used to assess such sites has been developed by English Nature.

**Site Ranking 2:** County Wildlife Sites (CWSs): these sites have a high priority for protection. Although there is currently no statutory protection, all of Suffolk's local authorities have included a policy in their local plans to protect CWSs from development.

**Site Ranking 3:** (including Local Wildlife Sites (LWSs)): sites which do not fulfil the criteria for SSSI or CWS status but have a high conservation value. These sites comprise the best examples of different habitats or are important for a particular species and area.

**Site Ranking 4 and 5:** Other Sites of Nature Conservation Interest: sites which are less important for wildlife but still retain a degree of naturalness. Locally common BAP species such as song thrush may be present and also locally common protected species such as reptiles. However, this ranking applies only in cases of low numbers of a single species and not significant populations of one or more species. (See LWS and CWSs).

In addition, these sites often provide valuable stepping stones and wildlife corridors along which species can travel between sites.

**Site Ranking 6:** Areas that are of limited or no value for wildlife: These may include built areas, large arable fields or regularly mown amenity grassland with no other semi- natural features.