

## **Appendix 2 – Draft Reptile Strategy SPD Consultation Statement**

In July 2015 and again in June 2017, the Council published a Call for Ideas for the Reptile Strategy SPD. The consultation was carried out under Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The Call for Ideas was issued through a Local Plan Newsletter available on the Council's web site, a specific web page linked to the 'current consultations' section on the Council's home page and posted or emailed directly to everyone on the Local Plan database. A period of six weeks was allowed for comments to be submitted, between 2<sup>nd</sup> July and 17<sup>th</sup> August 2015 and 14<sup>th</sup> June and 26<sup>th</sup> July 2017.

The comments received are shown below together with the Council's response.

<b>Respondent</b>	<b>Call for ideas comment August 2015</b>	<b>IBC Response</b>
Ipswich Wildlife Group	<p>Any development site should first be surveyed to discover the abundance of any reptiles present. If the green space remaining after development can sustain or enhance the reptile population, the shape should immediately be reptile fenced and measures taken to make the space suitable. Once done, reptiles can be trapped during the development and moved to the prepared green space. Once development is complete the fencing can be removed.</p> <p>Potential receptor sites should meet the following criteria:</p> <p>a) They must not have any significant existing reptile population and should be reptile fenced to stop reptiles moving in once the habitat has been enhanced.</p> <p>b) It is likely that any suitable site will not have good habitat for reptiles, so the habitat must be improved by undertaking the measures stated above. These measures must be complete before any translocation can take place.</p> <p>c) Sites must not be isolated from other wildlife areas. If they are in Ipswich, then being a part of the existing Ecological</p>	<p>Comment noted. The SPD highlights the need for appropriate ecological surveys to be carried out at proposed development sites, and with reference to the mitigation hierarchy, for reptiles to be retained and protected on site if possible.</p> <p>The purpose of the document, however, is not to set out the exact methods by which survey and capture should be carried out, but instead it refers readers to existing government guidance on this in Appendix 6.</p> <p>Comments noted. In paragraph 4.2, the SPD sets out a list of criteria that proposed receptor sites would need to meet before translocation could take place. These would apply to both privately and publicly owned sites.</p>

	<p>Network or at least being an extension of an existing green corridor would be ideal. If they are outside Ipswich, they could be linked with other green areas, potentially forming a Local Nature Reserve.</p> <p>d) Sites must not be earmarked for future development. It is clearly undesirable for a reptile population to be moved onto a site, only to be threatened with future translocation.</p> <p>Ideal receptor sites are likely to be agricultural land or short grass areas, where the habitat is not suitable for reptiles. Possible sites might be at Pond Hall Farm, the British Sugar site, the Suffolk Showground at Trinity Park, the area earmarked for the Country Park in the proposed Northern Fringe development, and an area of acid grassland to the south of Thorington Hall, near Belstead.</p> <p>Support the Borough Council on the preparation of this document.</p>	<p>Comments noted. Pond Hall Farm and Thorington Hall are included in the list of potential receptor sites in Appendix 1. The capacity of these sites is assessed by taking into account a number of different factors including possible future development on site. It has been judged that development proposals at the former British Sugar site are likely not compatible with reptile habitat and the site at Trinity Park is not owned by IBC so has not been considered for this document.</p> <p>The proposed Country Park within Ipswich Garden Suburb could provide a future site for translocation and suitable habitat could be built into the development plan as it moves forward. As design proposals progress, the Council will be able to better assess the potential of the site to provide future reptile habitat and work with developers to build this into the plans.</p>
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		Support for the document noted.
Historic England	No comments to make.	Noted.
Natural England	Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not relate to our remit to any significant extent. We do not therefore wish to comment.	Noted.
Suffolk Wildlife Trust	<p>Support the principle of a strategy for resolving the issue of reptiles and development in the Borough.</p> <p>New development should seek to retain features of ecological interest on site. The mitigation hierarchy should be applied to all development proposals to ensure that impact on ecological features are properly assessed and mitigated/compensated as necessary. If translocation is necessary recommends a criteria to be applied to the selection of a receptor site.</p> <p>Suggest that the area around Pond Hall Farm may be a suitable receptor site. It is suggested that the area is converted to, and managed as, habitat suitable for reptiles as part of the wider proposals for the area.</p>	<p>Comment noted. The SPD states that the mitigation hierarchy should be applied to all development sites so that if reptiles are identified on a site, the most desirable outcome is that the population can remain on site without being subject to harm from proposals. If mitigation on site is not possible, the SPD sets out guidance on the required translocation procedure and how this would be secured through the planning process.</p> <p>Comment noted. In paragraph 4.2, the SPD sets out a list of criteria that proposed receptor sites would need to meet before translocation could take place. These would apply to both privately and publicly owned sites</p> <p>Comment noted. Pond Hall Farm is included in the list of suitable receptor sites as identified by IBC in Appendix 1. The Council would look to employ a range of habitat creation and enhancement measures to ensure that designated areas of the site</p>

		would be suitable for reptile populations.
Suffolk County Council	Offer of support in the development of the SPD.	The SPD was drafted in consultation with IBC Parks officers and Suffolk Wildlife Trust
Marine Management Organisation	With regard to the specific Supplementary Planning Documents for consultation, the MMO have no further comments to make on these.	Noted.
Westerfield Parish Council	Westerfield Parish Council have considered these documents and, on this occasion, have noted the content and do not wish to make comment on the issues involved.	Noted.

<b>Respondent</b>	<b>Call for ideas 2 comment July 2017</b>	<b>IBC Response</b>
Suffolk Wildlife Trust	<p>We support the principle of a strategy for resolving the issue of reptiles and development in the Borough and are pleased to have this opportunity to comment on the emerging draft.</p> <p>Comments on site criteria: New development should seek to retain features of ecological interest on site.</p> <p>The mitigation hierarchy (as detailed in British Standard BS42020:2013) should be applied to all development proposals to ensure that impacts on ecological features are properly assessed and mitigated / compensated as necessary. Only once it has been established that avoidance of impact or mitigation on site are not ecological viable should translocation be considered.</p> <p>In those situations, we recommend that the following criteria are applied to the selection of a receptor site:</p> <ul style="list-style-type: none"> <li>• The proposed receptor site should be close to the donor site and consideration should only be given to potential receptor sites within the Borough boundary or the immediately</li> </ul>	<p>Comment noted. The SPD states that the mitigation hierarchy should be applied to all development sites so that if reptiles are identified on a site, the most desirable outcome is that the population can remain on site without being subject to harm from proposals. If this is not possible, the SPD sets out guidance on the required translocation procedure and how this would be secured through the planning process.</p> <p>Comments noted. In paragraph 4.2, the SPD sets out a list of criteria that proposed receptor sites would need to meet before translocation could take place. These would apply to both privately and publicly owned sites</p>

	<p>adjacent parishes. If this is not feasible (for example, if there is a very large population that needs to be translocated), then this must be justified.</p> <ul style="list-style-type: none"> <li>• The proposed receptor site should not support an existing population of reptiles and the reason for this should be understood (i.e. habitat suitability; food availability).</li> <li>• If the proposed receptor site already supports a very small number of animals and it is proposed to supplement this with a small number of animals from a development site, the reason for the low population level at the receptor site should be understood.</li> <li>• The proposed receptor site should be comprised of habitat suitable for the reptile species to be translocated. In addition, it should be of a sufficient size to allow the translocated population to sustain and expand itself.</li> <li>• The proposed receptor site must be suitable for receiving translocated animals prior to any works (including vegetation clearance) being undertaken on the development site.</li> <li>• The proposed receptor site should be connected to other areas of semi-natural habitat suitable for reptiles (or be capable of being connected to such areas), to ensure that fragmentation of populations is prevented.</li> <li>• The proposed receptor site must be able to be secured as suitable reptile habitat in perpetuity.</li> </ul> <p>The means to implement long term and appropriate habitat management must also be secured as part of any planning consent.</p>	<p>Comment regarding securing sites in perpetuity noted. The SPD explores opportunities to secure the long-term protection of receptor sites through Local Nature Reserve designations. Further information is available from GOV.UK on how to set up and manage sites as LNRs, as listed in Appendix 6.</p>
<p>Suffolk Wildlife Trust</p>	<p>Comments on potential receptor sites:</p> <p>We would suggest that consideration is given to the area around Pond Hall Farm being converted to, and managed as, habitat suitable for reptiles as part of the wider proposals for the area.</p> <p>Careful consideration should be given to ensuring that the design and management of</p>	<p>Comments noted. Pond Hall Farm is included in the list of suitable receptor sites as identified by IBC in Appendix 1. The Council would look to employ a range of habitat creation and enhancement measures to ensure that designated areas of the site</p>

	<p>the site is compatible with all of the proposed uses.</p>	<p>would be suitable for reptile populations.</p>
<p>Suffolk Wildlife Trust</p>	<p>We would expect that the guidance is adhered to by all developers in the borough to ensure that beneficial outcomes for reptiles are achieved from all relevant developments.</p> <p>The mitigation hierarchy must be followed in full to ensure the best outcomes in are achieved for habitats and species.</p> <p>We would be happy to input further in to the development of the Reptile Strategy SPD as it evolves.</p>	<p>Comments noted. The SPD sets out a standardised approach to reptile mitigation which will be applied to all development proposals. If after following the mitigation hierarchy process translocation is required, the SPD sets out guidance on how this will be secured through the planning process.</p>
<p>Suffolk County Council</p>	<p>Thank you for consulting Suffolk County Council on the scope for this supplementary planning document. Information held by the Suffolk Biodiversity Information Service could be incorporated into the document. However, a specific Reptile SPD may already duplicate guidance which is already available.</p> <p>Any guidance should refer to information available from Natural England, given reptiles are a protected species:  <a href="https://www.gov.uk/guidance/reptiles-protection-surveys-and-licences">https://www.gov.uk/guidance/reptiles-protection-surveys-and-licences</a>.</p>	<p>Comment noted. The SPD does not seek to duplicate the guidance which is already available, rather it seeks to provide a strategic approach for dealing with reptiles present on development sites across the Borough. The SPD provides a mitigation strategy for developers and outlines how this will be secured by the Council through the planning process.</p> <p>Comment noted. In Appendix 6, the SPD refers readers to guidance from Natural England provided through the GOV.UK site.</p>