

Reptile Strategy Supplementary Planning Document Consultation Statement

In July 2020, the Council published the draft Reptile Strategy Supplementary Planning Document for consultation. The consultation was carried out under Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The consultation documents were made available on the Council's website through 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 eight weeks was allowed for comments to be submitted, between 31st July and 25th September.

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

Respondent	Comments	IBC Response
Suffolk Wildlife Trust	<p>Suffolk Wildlife Trust welcomes this reptile strategy as it will help ensure that this biodiversity resource is conserved within the Ipswich locality and also make provision for enhancement for some of these reptile populations wherever possible.</p> <p>We have the following specific comments in relation to the document:</p> <p>Paragraph 4.10: Refers to 'park sites identified above' but not all of the above are Parks – two of those listed currently represent farmland or recently farmed land.</p> <p>Paragraph 4.12: Whilst we agree that land needs sufficient time to be prepared to receive reptiles, we query what measures are in place to prevent natural colonisation of the habitat by reptiles in the intervening period? For example, if arable land is being taken out of production to commence the process of habitat preparation, will these areas be suitably fenced with impermeable reptile fencing to prevent colonisation in time? If mowing/grass cutting is being used as an alternative method to discourage reptiles from colonising potential receptor areas, then this does not constitute 'properly prepared'. This is because this form of management will be arresting the development of the habitat to create a suitable habitat structure for reptiles and significantly, an adequate food supply. This is particularly relevant</p>	<p>Noted.</p> <p>Paragraph 4.10: Noted. Text edited as follows to clarify identification of park sites:</p> <p>4.10 Although the two park sites identified above (Bourne Park and Gippeswyk Park) can provide some limited use in the short-term, to ensure that a sufficient number of suitable receptor sites are available for the level of development which will be occurring over the Local Plan period, IBC will need to produce a schedule of receptor sites to identify all potential sites for reptile translocation across the Borough and when they will be ready for translocation to occur.</p> <p>Paragraph 4.12: Noted. Additional paragraph added as follows:</p> <p><u>4.13 Whilst work is undertaken to develop habitat at receptor sites, a number of measures will be put into place to prevent natural colonisation of the habitat by reptiles during the land preparation process. A combination of short mowing regimes and reptile fencing will be used to prevent reptiles moving into potential habitat areas. As habitat areas are developed, they will be monitored to identify any natural colonisation by reptiles, and this will be taken into account when considering potential translocation density. To further reduce the</u></p>

<p>to those sites which are being proposed to act as a receptor site for very large numbers of reptiles. Consequently, where mowing is taking place, this would need to cease for 2-3 years to allow for the development of habitat to sustain the reptile population into the long term so the use of reptile fencing becomes particularly relevant to prevent colonisation.</p> <p>Paragraph 7.1: Flowchart: Phase 1 is not the only type of habitat survey – suggest amending text box to ‘Phase 1 or similar habitat survey’ Amend all references in the flowcharts from suitable ecologist to ‘suitably qualified ecologist’</p> <p>Appendix 1: The timescales of habitat suitability for Pond Hall Farm and Thorington Hall Farm require reconsideration in the light of comments made in relation to Paragraph 4.12 and what constitutes a ‘properly prepared habitat’. Also see comments made in relation to Appendix 3.</p> <p>Appendix 2: Ensure costs cover requirement for reptile fencing at some receptor sites (or incorporate it into fee for the delivery of ‘reptile ready land’.</p>	<p><u>likelihood of colonisation by reptiles, hibernacula will not be placed on site until the release translocation phase.</u></p> <p>Paragraph 7.1 (Flowchart): Noted. Text edited as follows: Phase 1 <u>or similar</u> habitat survey Suitable <u>Suitably qualified</u> ecologist</p> <p>Appendix 1: Noted, timescales of habitat suitability for Pond Hall Farm and Thorington Hall Farm have been reviewed to take into account comments regarding ‘properly prepared habitat’.</p> <p>Additional paragraph added in section 4 as follows: <u>4.14 The timescale for habitat creation at potential receptor sites which are currently used as arable fields will be longer than grassland sites. It is likely that in order to establish suitable habitats at these arable sites, a minimum of 18 months will be required. However, farmland specifically managed for reptiles from a blank canvas is likely to have a much higher capacity for reptiles. Greater heterogeneity of vegetation height and bare ground can be achieved from a low nutrient start point through patchwork stripping of topsoil. Use of farmland connected to suitable reptile habitat is crucial to the success of this Strategy.</u></p> <p>Appendix 2: Noted, example costings amended to include costs to cover the requirement for reptile fencing at some receptor sites during habitat preparation.</p>
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	<p>Appendix 3: Thorington Hall Farm is currently arable, with the exception of some areas around the existing buildings. The numbers and species of reptiles being proposed for this receptor site will require additional land over and above the habitat associated with the existing field margins. However, intensively farmed sites take a longer period to establish suitable habitat for reptiles, as it takes a number of years for a sufficiently high invertebrate food supply to develop, despite the habitat appearing at first instances as suitable from a purely structural point of view. Pond Hall Farm was recently arable, with the fields left fallow since 2018. In terms of capacity, it should be factored in that areas to the west of the site, where there is a stream, are very wet and unsuitable for common lizard and slow worm. Whilst there is currently some suitable habitat within this site, the mowing regime across much of the site would need to be reconsidered years in advance if these larger areas were to come forward as a future receptor site.</p>	<p>Appendix 3: Noted. The timescales for habitat suitability for receptor sites in Appendix 1 were originally calculated a year ago when the SPD was first drafted. These have been updated to reflect site preparation timescale from planned adoption of the document in 2021.</p> <p>Additional paragraphs added in section 4 as follows:</p> <p><u>4.14 The timescale for habitat creation at potential receptor sites which are currently used as arable fields will be longer than grassland sites. It is likely that in order to establish suitable habitats at these arable sites, a minimum of 18 months will be required. However, farmland specifically managed for reptiles from a blank canvas is likely to have a much higher capacity for reptiles. Greater heterogeneity of vegetation height and bare ground can be achieved from a low nutrient start point through patchwork stripping of topsoil. Use of farmland connected to suitable reptile habitat is crucial to the success of this Strategy. For information on the IBC Habitat Suitability Index, refer to APPENDIX 5.</u></p>
<p>Anglian Water</p>	<p>Thank you for the opportunity to comment on the Draft Reptile SPD. The following response is submitted on behalf of Anglian Water. I would be grateful if you could confirm that you have received this response.</p> <p>We note that there are several allocated housing sites where lizards are present and that the SPD outlines the approach to surveys for these sites and a strategic approach to the use of receptor sites for translocation.</p> <p>The focus of the SPD appears to be housing sites identified in the Local Plan. But we would suggest it should made clear whether the intention is that SPD applies to the allocated housing sites only and not development more generally.</p>	<p>Noted.</p> <p>Noted. Text added to clarify as follows:</p> <p><u>2.5 The SPD will apply to any development site where an existing reptile population is identified.</u></p>

Natural England	Thank you for consulting Natural England on the draft Reptile Strategy SPD. I can confirm that Natural England has no concerns to raise, or any further recommendations concerning this SPD. We are very pleased that reptile mitigation will be provided on a strategic level and find the document sufficiently comprehensive and containing all the information we would expect concerning reptiles and reptile translocation.	Noted.
Historic England	Thank you for consulting us on the Council's draft Reptile Strategy Supplementary Planning Document (SPD). I can confirm that while we do not have any specific comments at this stage, we will be interested in receiving subsequent consultations on this and related documents.	Noted.
East Suffolk Council	<p>Thank you for providing the Council with an opportunity to respond to the consultation on the draft Reptile Strategy Supplementary Planning Document. The Council has reviewed the SPD, in particular in mind of our continued collaborative working on cross boundary issues and giving consideration to the delivery of the cross-border allocation on land at Humber Doucy Lane.</p> <p>Our officer comments, which have included input from the Council's Ecologist, are set out below.</p> <p>The principle of having a strategy in place is commendable and is supported, as a co-ordinated and planned mechanism of enabling development to come forward to meet housing needs in Ipswich Borough given the need to ensure that reptile populations are not harmed or that mitigation can be provided.</p> <p>It is noted that the SPD proposes that receptor sites from IBC owned land within the Borough boundary will be prioritised, but if this does not prove sufficient, additional sites outside the Borough may need to be identified. Should this situation arise, the Council would support having a mechanism in place to consider the need,</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted. Support for cross-boundary working is welcomed. IBC will seek to discuss and agree a mechanism for cross-boundary co-operation regarding identifying reptile translocation sites through the East Anglian Biodiversity and Planning Group. Any final decisions will go through Council Executive.</p>

	<p>identification and securing of any sites outside of the Borough to be worked up with neighbouring authorities in order that this can be fully considered and co-ordinated.</p> <p>In view of the comments above the Council would like to make the following observations:</p> <p>It is positive to see the mitigation hierarchy reinforced by this document. However, while biodiversity net gain has been referenced in regard to other documents, nothing is said about how this strategy will fit in with this and there may be opportunities to link with wider net gains for biodiversity.</p> <p>Section 4.9 – Is there a suggested mechanism to secure the future of private receptor sites? This is considered to be important in ensuing that sites can maintain their receptor site function.</p>	<p>Noted. The Reptile Strategy SPD will result in the creation of new habitat for reptile translocation on a number of sites across the Borough. This habitat creation could also benefit other species such as skylarks and a range of pollinators, therefore providing opportunities to enhance biodiversity.</p> <p>In line with the NPPF, developers will be required to provide biodiversity net gains for development sites. This is subject to the mitigation hierarchy so net gains should be provided on site where possible, however, off-site provision may be acceptable in some cases.</p> <p>Similarly, following the mitigation hierarchy, opportunities to retain/enhance reptile habitat on site should be considered in the first instance, and where this is not possible, translocation of reptiles to IBC/private receptor sites will be considered. It may be possible that off-site receptor site habitat creation could contribute to off-site biodiversity net gain.</p> <p>The Reptile Strategy SPD will be reviewed once the Environment Bill has been passed in order to clarify whether receptor site habitat creation could count towards off-site biodiversity contribution.</p> <p>Section 4.9: Noted. Section 6 of the Reptile Strategy SPD provides further information regarding the future security of private receptor sites. The SPD will be reviewed once the Environment Bill has been passed to assess the suitability of conservation covenants for reptile receptor sites.</p>
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	<p>Section 4.11 – Whilst the principle of buying arable land for conversion is supported, it needs to be acknowledged that this will take a lot longer to get to a suitable standard compared to existing unsuitably managed grassland.</p> <p>Section 5.4/Appendix 2 – If this is intended to give an indication of the cost for IBC to capture and translocate reptiles from a development site, reference should be made to the criteria for a site being considered clear of reptiles (i.e. likely minimum number of days trapping required/tin density/requirement for 5 clear trapping days/suitable timing and weather conditions). The cost quoted could be considerably out dependent on size of site, species present, habitats present etc.</p>	<p>An additional paragraph will be added in section 6 as follows:</p> <p><u>6.6 The Council will create an online register of reptile translocation sites, including both Council owned and privately owned sites. The sites will also be incorporated into the IBC interactive online mapping system.</u></p> <p>Section 4.11: Noted. Additional paragraph added in section 4 as follows:</p> <p><u>4.14 The timescale for habitat creation at potential receptor sites which are currently used as arable fields will be longer than grassland sites. It is likely that in order to establish suitable habitats at these arable sites, a minimum of 18 months will be required. However, farmland specifically managed for reptiles from a blank canvas is likely to have a much higher capacity for reptiles. Greater heterogeneity of vegetation height and bare ground can be achieved from a low nutrient start point through patchwork stripping of topsoil. Use of farmland connected to suitable reptile habitat is crucial to the success of this Strategy.</u></p> <p>Section 5.4: Noted. Additional text added for clarification as follows:</p> <p>5.4 The Section 106 agreement will consist of an Ecology Management Contribution; a sum paid towards the off-site translocation and future monitoring and management of a specified number of reptiles. Further contribution will be required prior to commencement should the actual number of reptiles to be moved exceed the estimation used to calculate the original sum paid. This will be charged at a set rate which will change incrementally depending on the additional number of reptiles identified. For an example full breakdown of costs, refer to APPENDIX 2. <u>The final cost for an individual project will be dependent</u></p>
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	<p>5.5 – It is not clear whether a developer can use their own ecologist to translocate to an IBC receptor site? It is considered that IBC would need to be satisfied that the site is an appropriate receptor site and that mechanisms are in place for these to be monitored and retained. It is not clear how these sites would be monitored and what would happen after ten years.</p> <p>6.3 – It is not clear what is meant by “If management is not deemed successful, measures will be taken to retrieve compensation”.</p>	<p><u>on a number of variable site factors. Costs will increase in line with inflation.</u></p> <p>Section 5.5: Noted. Additional text added to section 5 to clarify this as follows:</p> <p>5.3 If it is not viable for reptile populations to remain on site, translocation to suitable receptor sites is required. This can be secured through a Section 106 agreement with the Council, to include the translocation and ongoing monitoring and management of reptile populations and habitats. <u>If preferred, a suitably qualified Ecologist can carry out the physical translocation to an IBC receptor site and this will be reflected in the monetary contribution, but IBC will be responsible for all work to the receptor site such as hibernacula installation.</u></p> <p><u>5.5</u> Alternatively, if a developer is able to provide a suitable private receptor site, then translocation can be carried out privately. Planning conditions will be used to secure detailed receptor site information including appropriate ecological surveys to ensure that the habitat is suitable to support reptile populations. In addition, a comprehensive management plan and monitoring schedule will be required for approval by the Council and a rolling bond will be secured through a Section 106 agreement to enable the Council to undertake remedial work should translocation and ongoing management be deemed unsuccessful <u>the site owner be in breach of the management and monitoring obligations.</u> If all requirements are met, the bond will be returned after ten years as agreed with the Council.</p> <p>Section 6.3: Noted. Additional text added to paragraph 6.3 as follows:</p> <p>6.3 Regular maintenance will be required to ensure that optimum reptile habitat is retained, and on-going monitoring will require regular</p>
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	<p>It is not clear how it will be judged whether a translocation site is suitable or not. Parts of the document refer to assessing reptile numbers and parts refer to habitat size/quality. Assessing absolute reptile numbers on a site is often very difficult and is well beyond the scope of surveys normally undertaken for development proposals (7 visits). A professional ecological judgement based on species present, donor site size, donor site habitat quality and donor site connectivity vs receptor site size, receptor site habitat quality and receptor site connectivity would be more appropriate than trying to make an assessment based on actual animal numbers.</p> <p>The flow charts that outline the Translocation Process are at times a little hard to follow. Could a clearer direction be given to the reader or more colours used to indicate which direction needs to be followed?</p> <p>Flow Chart Part 2 – Mitigation hierarchy – displacing animals into other parts of the site/adjacent habitat is likely to be mitigation rather than avoidance.</p>	<p>site surveys to be undertaken to review reptile population size and health. This information will need to be recorded in appropriate reports <u>in years 1, 3, 5, 7 and 10</u>, which will be reviewed by the Council. <u>The Council's Parks team will carry out site visits in agreement with the landowner to help assess whether the objectives of the management plan are being met. This will be secured through a Section 106 agreement. If management and monitoring obligations are not met, the Council not deemed successful, will take measures will be taken to retrieve compensation through the bond collected as part of the Section 106 agreement to enable improvements to be made.</u></p> <p>Noted. The Council agree that a professional ecological judgement is an appropriate option for assessing whether a site is suitable for translocation.</p> <p>The IBC Wildlife team has a matrix for assessing reptile capacity for receptor sites which includes many of the factors mentioned. This information has been included in Appendix 5.</p> <p>Noted. The design and layout of the flow charts has been reviewed and edited for clarity.</p> <p>Flow Chart Part 2: Noted. This has been clarified in the text as follows:</p> <p>Avoid: Change layout to avoid area occupied, displace from sensitive areas by changing vegetation, change timing of work.</p> <p>Mitigate: Translocation, <u>displace from sensitive areas by changing vegetation.</u></p> <p>Compensate: Create links to other habitats, create new habitat, improve existing habitat</p>
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	<p>Flow Chart Part 4 – It is not clear whether the “Can reptiles be protected on site?” refers to the donor site or the receptor site? If it is the donor site, then the question seems to fit better as part of Flow Chart Part 2. If it is the receptor site, then it seems to fit better as part of Flow Chart Part 3.</p> <p>Appendix 2 – what are the S106 costs based on? Are these averages of past agreements?</p> <p>Para 3.23 – It is noted that the site sheet for site ISPA4.1 Northern End of Humber Doucy Lane in the emerging Ipswich Local Plan (Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD Review – Final Draft, January 2020) does not refer to the need for reptile relocation. However, it isn’t clear whether the reference to ‘reptile’ in the 2019 Wildlife Audit would trigger the need for a survey and it would be helpful to provide further clarity around where surveys and mitigation measures will be required.</p>	<p>Flow Chart Part 4: Noted, the flow chart order has been reviewed and amended for clarity.</p> <p>Appendix 2: The indicative section 106 costs are based on past agreements. The text has been edited as follows for clarity:</p> <p>APPENDIX 2: <u>Example</u> Breakdown of Section 106 Agreement Costs (based on previous IBC agreements)</p> <p>Para 3.23: Noted. Additional text will be considered for addition to the ISPA4.1 Site Sheet to clarify the need for further reptile surveys to be undertaken at the site allocation. These changes would be published for comment in the main modifications document as part of the Local Plan examination.</p>
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Call For Ideas Consultation

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 2nd July and 17th August 2015 and 14th June and 26th July 2017.

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

Respondent	Call for ideas comment August 2015	IBC Response
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 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>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. 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>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>

	Support the Borough Council on the preparation of this document.	<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> <p>Support for the document noted.</p>
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 would be suitable for reptile populations.</p>

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.

Respondent	Call for ideas 2 comment July 2017	IBC Response
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. 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"> • 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 adjacent parishes. If this 	<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>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>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"> • 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). • 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. • 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. • The proposed receptor site must be suitable for receiving translocated animals prior to any works (including vegetation clearance) being undertaken on the development site. • 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. • The proposed receptor site must be able to be secured as suitable reptile habitat in perpetuity. <p>The means to implement long term and appropriate habitat management must also be secured as part of any planning consent.</p>	
Suffolk Wildlife Trust	<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 the site is compatible with all of the proposed uses.</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 would be suitable for reptile populations.</p>

Suffolk Wildlife Trust	<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 into 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>
Suffolk County Council	<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: https://www.gov.uk/guidance/reptiles-protection-surveys-and-licences.</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>