

SUDBURY TOWN COUNCIL
MINUTES OF THE MEETING OF THE POLICY AND RESOURCES COMMITTEE HELD IN
SUDBURY TOWN HALL ON THURSDAY 9TH APRIL 2026 AT 6.30PM

Committee members present: Mrs M Barrett – Chair
Mr A Osborne
Mrs J Osborne
Mr A Stohr
Mr A Welsh

Officers in attendance: Mr C Griffin – Town Clerk
Mrs C Morgan – Deputy Town Clerk

1. SUBSTITUTES AND APOLOGIES

Apologies were received from Councillors Mr P Beer and Mr K Graham. Councillor Mr A Osborne was the substitute for Mr K Graham.

2. DECLARATIONS OF INTERESTS

Councillor Mr A Osborne declared that he was a Babergh District Councillor.

3. DECLARATION OF GIFTS AND HOSPITALITY

No declarations of gifts or hospitality were made.

4. REQUESTS FOR DISPENSATION

No requests for dispensation had been received.

5. MINUTES

RESOLVED

That the minutes of the Policy and Resources Committee meeting held on the 26th March 2026 be confirmed and signed as an accurate record.

6. ACTIONS FROM THE PREVIOUS MEETING

The Town Clerk confirmed that the actions from the previous meeting had been taken to the full council for adoption.

7. TO REVIEW AND APPROVE THE DRAFT BODY WORN VIDEO CAMERAS POLICY.

The draft body worn video camera policy, which had been revised by the new Deputy Clerk, had been circulated to members with the agenda.

RESOLVED

To recommend that the full council adopt the draft Body Worn Video Camera Policy shown at pages 295 to 301.

8. TO REVIEW AND APPROVE THE EQUALITY AND DIVERSITY POLICY.

The equality and diversity camera policy, which had been revised by the new Deputy Clerk, had been circulated to members with the agenda.

RESOLVED

To remove paragraph 20 from the draft.

To amend paragraph 28 to make it clear that members of the public who consider that they have been discriminated against should use the council's complaints procedure.

To recommend that the full council adopt the draft Equality and Diversity Policy shown at pages 302 to 305.

9. TO REVIEW AND APPROVE THE LOAN OF COUNCIL POLICY

The loan of council property policy, which had been revised by the new Deputy Clerk, had been circulated to members with the agenda.

RESOLVED

To recommend that the full council adopt the draft Loan of Council Property Policy shown at pages 306 to 309.

10. TO REVIEW AND APPROVE THE USE OF TOWN COAT OF ARMS POLICY

The use of Town Coat of Arms policy, which had been revised by the new Deputy Clerk, had been circulated to members with the agenda.

The Town Clerk clarified that the term 'Coat of Arms' should always be used and not 'crest' when referring to Sudbury's armorial bearings.

RESOLVED

To recommend that the full council adopt the draft Use of Town Coat of Arms Policy shown at page 310.

11. TO REVIEW AND APPROVE THE BIODIVERSITY POLICY

The biodiversity policy, which had been drafted by the Business Manager, had been circulated to members with the agenda.

Members asked what legislation governed the requirement for 20% of the weighting in a tender assessment to be allocated to sustainability and biodiversity. Neither the Town Clerk or Deputy Clerk knew the answer, but the Town Clerk promised to find out and have the information available for the full council to consider when they were adopting this policy.

RESOLVED

To review the requirement for 20% of the weighting in a tender assessment to be allocated to sustainability and biodiversity before adoption.

To recommend that the full council adopt the draft Biodiversity Policy shown at pages 311 to 316.

The meeting concluded at 7:33 pm

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Chairman



SUDBURY
TOWN COUNCIL

POLICY FOR THE USE OF BODY WORN VIDEO CAMERAS (BWVC)

POLICY FOR THE USE OF BODY WORN VIDEO CAMERAS (BWVC)

1. Purpose

The purpose of this policy is to set out how Sudbury Town Council (STC) will use Body Worn Video Cameras (BWVC) lawfully, fairly, transparently and proportionately.

STC uses BWVC to:

- Support the safety and welfare of employees, particularly market operators and highways operators
- Reduce the risk of aggressive, abusive or threatening behaviour escalating
- Provide clear and reliable evidence of incidents
- Support civil enforcement activity
- Improve transparency and accountability in STC operations
- Assist in the investigation of complaints, incidents and disputes
- Support the prevention and detection of anti-social or unlawful behaviour

BWVC must only be used where its use is necessary, justified and proportionate to STC's legitimate operational purposes.

2. Scope

This policy applies to:

- All STC employees authorised to use BWVC
- All managers responsible for BWVC equipment and footage
- All STC owned BWVC devices and associated software
- All audio and visual recordings captured by BWVC

2.2 Only staff who have received appropriate training and authorisation may use BWVC.

3. Legal and Regulatory Framework

STC will operate BWVC in accordance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Human Rights Act 1998
- Freedom of Information Act 2000
- Information Commissioner's Office (ICO) guidance on video surveillance systems, including Body Worn Video
- Reveal Media's Guidance for the Non-Police Use of Body Worn Video Devices

- STC Data Protection Policy, Data Retention Policy and Information Security Procedures and Health and Safety Policy

STC recognises that BWVC captures personal data and may include audio, which is particularly intrusive and must therefore be used where justified. The audio function should only be used where there is clear operational need.

4. Lawful Basis for Processing

The lawful basis for processing personal data through BWVC is:

- Article 6(1)(e) UK GDPR – processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in STC.
- Where special category or criminal offence data is incidentally captured, processing will be managed in accordance with the Data Protection Act 2018 and the STC relevant policy documentation.

5. Roles and Responsibilities

The Town Clerk is responsible for:

- Overall governance of BWVC use
- Ensuring secure storage arrangements are in place
- Oversight of retention, deletion and audit arrangements

The Project Manager or Business Manager is responsible for:

- Issuing and recording BWVC devices
- Maintaining issue and return logs
- Monitoring operational compliance
- Reporting misuse or equipment faults

Each staff member using BWVC is responsible for:

- Safe handling and use of their allocated device
- Carrying out pre-use checks
- Ensuring footage is uploaded promptly
- Complying fully with this policy

Misuse, negligent damage, unauthorised sharing or deliberate non-compliance may be dealt with under the STC disciplinary procedures.

6. Operational Use

BWVC must only be activated where this is a legitimate operational reason, including:

- All market duties, the nature of the work requires continuous recording of both video and audio for the duration of market duties to support staff safety, public reassurance, incident prevention, enforcement activity, or evidential integrity
- all highways duties, the nature of the work requires continuous recording of both video and audio for the duration of highways duties to support staff safety, public reassurance, incident prevention, enforcement activity, or evidential integrity
- Aggressive, abusive or threatening behaviour
- Actual or suspected anti-social behaviour
- Actual or suspected criminal activity
- Civil enforcement action
- Public safety incidents
- Where evidence preservation is necessary
- Where a staff member reasonably believes an interaction may escalate

Staff using BWVC should, where safe and practicable, inform individuals that recording is taking place.

The device should remain focused on the relevant incident and staff using BWVC must take reasonable steps to minimise unnecessary intrusion into the privacy of bystanders and unrelated third parties.

Once activated, recording should continue only for as long as is necessary and proportionate to capture the incident and its immediate aftermath.

Where a staff member decides not to activate BWVC during an incident where its use might reasonably have been expected, the rationale must be recorded in their incident notebook.

7. Storage, Security and Access

All BWVC devices must be stored securely when not in use.

Footage must be uploaded as soon as practicable and no later than the end of the working day to STC's approved secure storage system.

The following is strictly forbidden:

- Downloading footage to personal devices
- Transfer to unapproved cloud or removable storage devices
- Sharing footage via personal email, messaging applications or social media

- Copying footage without authorisation

All recordings must be encrypted and access restricted to authorised personnel only. Access permission must be role-based and subject to regular review.

8. Viewing and Disclosure

Footage may only be viewed by authorised personnel where necessary for:

- Investigation of incidents
- Investigation of complaints
- Disciplinary matters
- Civil enforcement review
- Police requests
- Insurance claims
- Legal proceedings
- Compliance with statutory disclosure obligations

All viewings must take place in a private or restricted environment.

A full audit trail must be maintained recording:

- Who accessed footage
- Date and time of access
- Purpose of access
- Whether footage was copied or disclosed
- Deletion date

Disclosure to the Police, courts, insurers, legal representatives or other lawful recipients must be authorised by the Town Clerk or nominated officer.

9. Retention and Deletion

Non-evidential footage will normally be retained for 31 days, after which it will be securely deleted automatically.

Where footage is required for:

- Incident investigation
- Complaints
- Disciplinary proceedings
- Legal proceedings
- Insurance claims
- Police investigation

- Subject Access request (SAR)
- Freedom of Information request (FOI)

It may be retained longer in accordance with the STC's Data Retention Policy schedule, but only for as long as necessary. Once no longer required, footage must be securely and permanently deleted, with the decision recorded in the audit log.

10. Subject Access Requests, Freedom of Information and Complaints

Individuals may request access to footage containing their personal data by submitting a Subject Access Request (SAR). Requests will be handled in accordance with:

- UK GDPR
- Data Protection Act 2018
- STC SAR Procedures

Request under the Freedom of Information Act 2000 will be considered on a case-by-case basis, subject to relevant exemptions.

Complaints about BWVC use should be made through the STC Complaint's Procedure.

11. Privacy Information and Public Awareness

STC will ensure that the public is made aware of BWVC use through:

- Published privacy notices
- Website information
- Staff verbal notification where appropriate
- Staff uniform / device visibility

This is to ensure compliance with the principles of fairness and transparency.

12. Governance, review and DPIA

STC will maintain a Data Protection Impact Assessment (DPIA) for BWVC use and review it periodically, particularly where:

- Equipment changes
- Software changes
- Audio settings change
- Changes in operational deployment
- Complaints or incidents indicate risk

This policy will be reviewed every five years, or sooner where legislation, ICO guidance or operational requirements change.

Policy Name	Policy for the Use of Body Worn Video Cameras (BWVC)
Current Status	Draft
Approved	
Next Review Date	April 2031
Policy Owner	



SUDBURY
TOWN COUNCIL

EQUALITY, DIVERSITY & INCLUSION POLICY

Our Commitment

1. Sudbury Town Council (STC) is committed to providing equal opportunities in employment and to avoiding unlawful discrimination.
2. This policy is intended to assist STC to put this commitment into practice. Compliance with this policy should also ensure that employees do not commit unlawful acts of discrimination.
3. Striving to ensure that the work environment is free of harassment and bullying and that everyone is treated with dignity and respect is an important aspect of ensuring equal opportunities in employment.

The Law

4. It is unlawful to discriminate directly or indirectly in recruitment or employment because of age, disability, sex, gender reassignment, pregnancy, maternity, race (which includes colour, nationality, caste and ethnic or national origins), sexual orientation, religion or belief, or because someone is married or in a civil partnership. These are known as "protected characteristics".
5. Discrimination after employment may also be unlawful, e.g. refusing to give a reference for a reason related to one of the protected characteristics.
6. STC will not discriminate against or harass a member of the public in the provision of services or goods. It is unlawful to fail to make reasonable adjustments to overcome barriers to using services caused by disability. The duty to make reasonable adjustments includes the removal, adaptation or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. In addition, service providers have an obligation to think ahead and address any barriers that may impede disabled people from accessing a service.

Types of Unlawful Discrimination

7. Direct discrimination is where a person is treated less favourably than another because of a protected characteristic.
8. In limited circumstances, employers can directly discriminate against an individual for a reason related to any of the protected characteristics where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim.
9. Indirect discrimination is where a provision, criterion or practice is applied that is discriminatory in relation to individuals who have a relevant protected characteristic such that it would be to the detriment of people who share that protected characteristic compared with people who do not, and it cannot be shown to be a proportionate means of achieving a legitimate aim.
10. Harassment is where there is unwanted conduct, related to one of the protected characteristics (other than marriage and civil partnership, and pregnancy and maternity) that has the purpose or effect of violating a person's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct.

11. Sexual Harassment is where there is unwanted conduct of a sexual nature that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. This includes verbal, non-verbal or digital conduct regardless of intent.
12. Associative discrimination is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic.
13. Perceptive discrimination is where an individual is directly discriminated against or harassed based on a perception that he/she has a particular protected characteristic when he/she does not, in fact, have that protected characteristic.
14. Third-party harassment occurs where an employee is harassed and the harassment is related to a protected characteristic, by third parties.
15. Victimisation occurs where an employee is subjected to a detriment, such as being denied a training opportunity or a promotion because he/she made or supported a complaint or raised a grievance under the Worker Protection (Amendment of the Equality Act 2010) 2023, or because he/she is suspected of doing so. However, an employee is not protected from victimisation if he/she acted maliciously or made or supported an untrue complaint.
16. Failure to make reasonable adjustments is where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have that protected characteristic and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

Equal Opportunities in Employment

17. STC will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

Recruitment

18. Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability. Disability and personal or home commitments will not form the basis of employment decisions except where necessary.

Working Practices

19. STC will consider any possible indirectly discriminatory effect of its standard working practices, including the number of hours to be worked, the times at which these are to be worked and the place at which work is to be done, when considering requests for variations to these standard working practices and will refuse such requests only if the council considers it has good reasons, unrelated to any protected characteristic, for doing so. STC will comply with its obligations in relation to statutory requests for contract variations. The council will also make reasonable adjustments to its standard working practices to overcome barriers caused by disability.

Equal Opportunities Monitoring

20. Not used.
21. STC treats personal data collected for reviewing equality and diversity in accordance with the Data Protection Policy. Information about how data is used and the basis for processing is provided in the Data Protection Policy.

People not Employed by STC

22. STC will not discriminate unlawfully against those using or seeking to use the services provided STC.
23. Any bullying or harassment by suppliers, visitors or others should be reported to STC who will take appropriate action.

Training

24. STC will provide training in equal opportunities to those likely to be involved in recruitment or other decision making where equal opportunities issues are likely to arise.
25. STC will provide training to all staff engaged to work at the council to help them understand their rights and responsibilities and what they can do to help create a working environment free of bullying and harassment. Additional training will be provided to managers to enable them to deal with complaints of bullying and harassment.

Employee Responsibilities

26. Every employee is required to assist STC to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination or harassment. Employees can be held personally liable as well as, or instead of, STC for any act of unlawful discrimination. Employees who commit serious acts of harassment may be guilty of a criminal offence.
27. Acts of discrimination, harassment, bullying or victimisation against employees or customers are disciplinary offences and will be dealt with under the STC disciplinary procedure. Discrimination, harassment, bullying or victimisation may constitute gross misconduct and could lead to dismissal without notice.

Grievances and Complaints

28. If a staff member considers that they may have been unlawfully discriminated against, they should use the STC grievance procedure. If a member of the public considers that they may have been unlawfully discriminated against, they should use the STC complaints procedure.
29. STC will take any complaint seriously and will seek to resolve any grievance that it upholds. You will not be penalised for raising a grievance, even if your grievance is not upheld, unless your complaint is both untrue and made in bad faith.

Monitoring and Review

30. This policy will be monitored periodically by STC to judge its effectiveness and will be updated in accordance with changes in the law.
31. This is a non-contractual procedure which will be reviewed from time to time.

(Based on the NALC template 2019)



LOAN OF PROPERTY POLICY

1. Purpose

The purpose of this policy is to set out how Sudbury Town Council (STC) administer the loan of council property to members of staff, councillors or third parties for the facilitation of council business. All loans must be supported by a clear reason and formally authorised before the item leaves council premises.

2. Scope

Property means any tangible, moveable asset that belongs to STC. If in doubt, ask the Town Clerk.

All items recorded in the Fixed Asset register, will require prior approval by Full Council and must also be noted in the register as on loan, detailing the borrower and location details.

All property remains the sole property of STC at all times.

Private use is prohibited unless specifically authorised in writing and assessed for any legal, tax, insurance and policy implications.

3. Legal and regulatory Framework

STC will operate this policy in accordance with:

- Health and Safety Policy
- IT and Communications Policy
- Data Protection Policy
- Data Retention Policy

4. Roles and Responsibilities

The attached loan agreement must be completed by the person borrowing the council property and the appropriate line manager.

Any loan considered contentious must be discussed with the Town Clerk before approval can be given.

A signed copy of the agreement will be retained by the line manager and scanned into the Master Drive.

If a line manager wants to borrow any council property, they must get approval from the Town Clerk.

If the Town Clerk wants to borrow council property, they must get approval from the Mayor.

If a councillor wants to borrow council property, they must get approval from the Town Clerk.

Borrowers must:

- Take reasonable care of the property
- Keep it secure at all times

- Not allow use by any other third party
- Report faults immediately to the appropriate line manager
- Report loss, theft or damage immediately to the appropriate line manager
 - The police must be informed and a crime number obtained for lost or stolen electronic devices
- Return the item on request or at the end of the loan period

For electronic devices, borrowers must comply with all IT, Data Protection, Data Retention and cyber security policies, including password protection, software updates, secure storage, and immediate reporting of any suspected personal data breach.

STC may inspect, update, service or recall any loaned item at any time.

Failure to comply with this policy may result in disciplinary, conduct, insurance or recovery action where appropriate.

Policy Name	Policy for the Loan of Council Owned Property
Current Status	Draft
Approved	
Next Review Date	April 2031
Policy Owner	

LOAN OF PROPERTY OWNED BY SUDBURY TOWN COUNCIL

This loan agreement exists between Sudbury Town Council and the person who has signed the loan agreement.

Description of property, including Make, Model & Serial number (if applicable)	
Name of person requesting loan (BLOCK CAPITALS)	
Date loan started	Date by which the loan must be returned or resigned out
<p>I understand that the property I am borrowing remains in the ownership of Sudbury Town Council and confirm that I have read and understood the policy for the loan of Sudbury Town Council property. I agree to take all responsible care of the property and return it by the date specified above or at the time my employment/time as a councillor ceases. I understand that if the property is lost or damaged, I may be charged for replacement costs. I confirm that I have home insurance to cover the property within my home and will be responsible for any required claims, including excess policy payments.</p> <p>I confirm that I have read and understood Sudbury Town Council’s IT and Communications Systems policy. <input type="checkbox"/></p>	
Signed	Date
Loan authorised by the appropriate manager	Date
Name	
Signed	



USAGE OF THE TOWN COAT OF ARMS POLICY

The Town Clerk shall exercise their discretion when considering requests for the use of the Town Coat of Arms. Where there is any uncertainty, the request shall be referred to the Policy and Resources Committee for consideration.

This guidance is intended to uphold and enhance the civic status of the town. Approval should therefore generally be limited to well-established charitable, community, or sporting organisations, and shall not be granted for commercial or political purposes.

The right to use the Town Coat of Arms may be withdrawn if circumstances change in the future, for example if the organisation relocates outside the town or no longer meets the criteria for approval.

Mr C Griffin
Town Clerk

April 2026

Policy Name	Usage of the Town Coat of Arms
Current Status	
Approved	
Next Review Date	April 2031
Policy Owner	



Sudbury Town Council Biodiversity Policy

DEFINITIONS AND KEY COMPONENTS

- **Legislation & Targets:** The [Environment Act 2021](#) mandates legally binding targets, including halting species decline by 2030, reversing it by 2042, and creating 500,000 hectares of new habitat by 2042.
- **Biodiversity Net Gain (BNG):** [Mandatory in England](#), most developments must deliver a 10% improvement in biodiversity value, requiring a "net gain" compared to the pre-development state.
- **30 by 30 Target:** The [Global Biodiversity Framework](#) sets a target to effectively conserve and manage 30% of land and sea by 2030.
- **Mitigation Hierarchy:** Policies require developers to follow a strict order: first avoid damage, then minimise, restore on-site, and lastly compensate/offset off-site.
- **Local Action:** [Local councils](#) are required to strengthen their biodiversity duty through habitat maintenance, wildflower planting, and wildlife-friendly management

BACKGROUND

The Importance of Biodiversity

Biodiversity is key to all the processes that support life on Earth. We rely on it for our essential needs, like food, shelter, energy and medicine, as well as for the ecosystem services it provides, such as climate regulation, flood management, water purification, disease and pest control, and pollinationⁱ

Additionally, more than half of the world's gross domestic product (GDP) is highly or moderately dependent on nature (WEF 2020; PwC 2023). Biodiversity also holds deep cultural significance. It not only provides a sense of place but also offers endless opportunities for recreation, tourism and inspiration amid our diverse landscapes.

Locally, Visit East of England's entire visitor economy manifesto ' *Naturally*ⁱⁱ recognises the role of East Anglia's diverse natural assets both nature's local recovery and the region's economic development. From award-winning coastlines, ancient water meadows and riversides, clean water bathing sites, marshes, heathlands and fens – all supporting a range of wildlife and attracting visitors.



In Sudbury, the promotion and protection of our natural environment is as important as any other heritage or community asset. From our ancient water meadows that support a huge variety of wildlife, to our recently attained DEFRA Clean Bathing status for the River Stour at Friars Meadow, to the council's green assets at The Croft, Millacre, Cemetery, Allotments and any other open space that may come under the Council's care in the future.

National decline and consequences of inaction

The UK is one of the most nature depleted countries in the world. The 2023 *State of Nature*ⁱⁱⁱ reports that: 16% of species are threatened with extinction from Great Britain. 151 of 10,008 assessed have already become extinct. The distributions of half of flowering plant species have decreased across Great Britain by 54%.

Failure to reverse biodiversity decline threatens critical ecosystem services, including food security, water purification, and flood management, while accelerating climate change impacts, increased disease outbreaks, and diminished public health.^{iv}

In accordance with the duty^v imposed on Town and Parish Councils by Section 40 of the Natural Environment and Rural Communities Act 2006, updated by Section 102 of the Environment Act 2021, the council, must from time to time consider what action the authority can properly take, consistently with the proper exercise of its functions, to further the general biodiversity objective. This duty also means that Town and Parish Councils can spend funds in conserving biodiversity.

LOCAL ACTION

“Parish and town councils are crucial in promoting biodiversity within their communities”.

National Association of Local Councils (NALC)

SLCC advises^{vi}: *“English public authorities **including town and parish councils** should be able to show their duty to have regard for conserving biodiversity if they have identified ways to integrate biodiversity when they:*

- *Develop policies and strategies and put them into practice.*
- *Manage and advise on the planning system in line with NPPF policies on biodiversity.*
- *Manage: their land and buildings, woodlands and nature reserves, gardens, parks and public open space, community amenities e.g. sports grounds and cemeteries, waste and pollution, energy and water.*
- *Develop infrastructure, such as roads, buildings or flood defences.*
- *Make decisions about procurement.*
- *Implement economic, environmental and social programmes”*

NEED FOR A BIODIVERSITY POLICY

For several years Sudbury Town Council (hereafter ‘the council’) has been positively implementing schemes^{vii} for biodiversity net gain in areas within our control. This includes:

- Introduction of pollinator-friendly and drought tolerant perennial planting schemes to replace wasteful annual planting, this has been integrated into our Floral Displays contract (current 2023 – 2026) partly informed by Bug Life's (2021) ‘B-Lines’ Report.^{viii}
- Implementing a rainwater harvesting project (currently under review)
- Introduction of ‘no mow’ summer meadows on the Croft and North Croft. (2023 and ongoing).



- Better management of our Green Cemetery with a refocus on native tree species integrated into our memorial planting policy within the cemetery regulations to encourage wildlife and balance the needs of Cemetery users. (2024 and ongoing)
- Dedicated wildlife zones in our allotments that create essential habitats for a range of endangered species including the common lizard.

Although these local schemes appear to have an impact on encouraging biodiversity locally, the adoption of a formal biodiversity policy would play a key role in monitoring the council's biodiversity net gain actions and recording their impact(s) to relevant bodies^x ensuring the council is proactive in supporting nature recovery in our region. There is a need to regularly review and adapt our biodiversity action plan to respond to legislation^x and local impact.

The National Association for Local Councils (NALC)^{xi} advises that local councils should develop and implement policies that support biodiversity conservation, such as biodiversity action plans or green procurement policies. These policies can guide decision-making and ensure that biodiversity considerations are integrated into parish council activities and projects.

AIMS, OBJECTIVES AND ACTIONS:

The aim of this policy is to proactively seek and implement ways of conserving and enhancing the biodiversity of the Council's assets and in areas of influence within the town.

The Council will:

- The Full Council and any committees of the Council will consider sustainability, environmental impact and biodiversity when making decisions and will develop and implement policies and strategies as required.
- In particular, the Council will aim to improve the biodiversity of the area in the following ways:
 - consider the potential impact on biodiversity represented by planning applications.
 - manage its land and property using environmentally friendly practices that will promote biodiversity especially by defining 'no mow summer meadows' / wildflower areas within our land asset areas. **(see appendix a)** and being proactive in creating habitats for native species, especially those that are endangered such as swift and other bird boxes, bug houses, protected areas for lizards, slow worms, toads etc.
 - Seeking the best sites within our control to plant and sow pollinator-friendly wildflower, plant and tree species to encourage and support a range of species.
 - support local businesses and council operations in the adoption of low impact/nature positive practices.
 - Make sustainability and biodiversity consideration a significant proportion **(up to 20%)** of application weightings in tender and procurement contract considerations that may affect biodiversity.
 - Work collaboratively with other organisations in and around Sudbury to encourage sustainable management of land with biodiversity at the forefront (detailed below)
 - support residents and local organisation activities that enhance and promote biodiversity.

LOCAL COMMUNITY

The Council will:

- Raise public awareness of biodiversity issues, including through its website, newsletters and engagement events and workshops.



- Engage with local businesses and residents regarding biodiversity in the community and how members of the community can assist and make a difference.
- Where feasible, involve the community in biodiversity projects on its land including for example tree planting, wildflower meadows, birdbox making.

PARTNERS

The Council will:

- Work in partnership with other organisations to protect, promote and enhance biodiversity within the council area. Identified local organisations include, but are not limited to:
 - **Sudbury Common Lands Charity**
 - **River Stour Trust** (especially with regard to Clean Bathing status).
 - **The Council's Floral Contractor** (at the time of writing, The Garden Nursery)
 - **Eden-Rose Coppice**
 - **Closed churchyard grounds Maintenance: All Saints and St. Gregory's**
 - **Suffolk Wildlife Trust**
 - **Biodiversity Officer at Babergh District Council**
 - **Suffolk County Council Ecology team**
 - **Suffolk Biodiversity Information Service (iRecord app)**
 - **Suffolk Tree Warden Network**
- review any local nature recovery strategies, species conservation strategies, or protected site strategies in respect of local Sites of Special Scientific Interest (SSSIs) and consider how it may become more involved in implementing the strategies' recommendations.

REPORTING

The Council will:

- During the Summer season May – October, measure, record and report to local and national biodiversity data recorders such as: *State of Nature, Suffolk Wildlife Trust and / or Suffolk Biodiversity Information Service* monthly.
- Keep our own records of species recording in areas with and without special measures implemented.

MONITORING AND REVIEW

- This Policy should be reviewed annually and in accordance with national biodiversity legislation.



REFERENCES

ⁱ (2025) Department of Agriculture, Environment and Rural Affairs (DAERA), Scottish Government, Welsh Government and UK Government (2025) published '*Blueprint for Halting and Reversing Biodiversity Loss: the UK's National Biodiversity Strategy and Action Plan for 2030*'ⁱ

https://uk.chm-cbd.net/sites/gb/files/2025-04/31.03.2025_UK_National_Biodiversity_Strategy_and_Action_Plan.pdf

ⁱⁱ '*Visit East Anglia, Naturally*'

https://issuu.com/visiteastanglia-uk/docs/vee_ddp_175x297mm_issuu/s/17314267

ⁱⁱⁱ <https://stateofnature.org.uk/infographics/> (2023)

^{iv}

https://assets.publishing.service.gov.uk/media/696e0eae719d837d69afc7de/National_security_assessment_-_global_biodiversity_loss_ecosystem_collapse_and_national_security.pdf

^v <https://www.legislation.gov.uk/ukpga/2006/16/section/40>

<https://www.gov.uk/government/publications/defras-biodiversity-duty-statement-2025/defras-statement-on-the-strengthened-biodiversity-duty>

^{vii} Sudbury Town Council implemented and ongoing schemes: No mow and wildflower conservation areas, public engagement and partnership working, protected areas within the allotments where endangered species have been found. As well as urban town centre 'B-Line' pollinator friendly corridors.



viii

B-Lines: Insect Super Highways, Buglife (2021)

<https://cdn.buglife.org.uk/2021/03/B-Lines-Report-DIGITAL-01.pdf>

^{ix} Local and national biodiversity data recorders:

<https://stateofnature.org.uk/get-involved/>

<https://www.suffolkwildlifetrust.org/identification>

<https://nbn.org.uk/record-share-explore-data/record-wildlife-a-fun-way-to-help-nature/>

^x *UK Biodiversity Action Plan*, UK Government

<https://assets.publishing.service.gov.uk/media/5a7ced59ed915d2017106d17/2428.pdf>

^{xi} *Tackling Climate Change: Biodiversity*, NALC

<https://www.nalc.gov.uk/campaigns/tackling-climate-change/biodiversity.html>