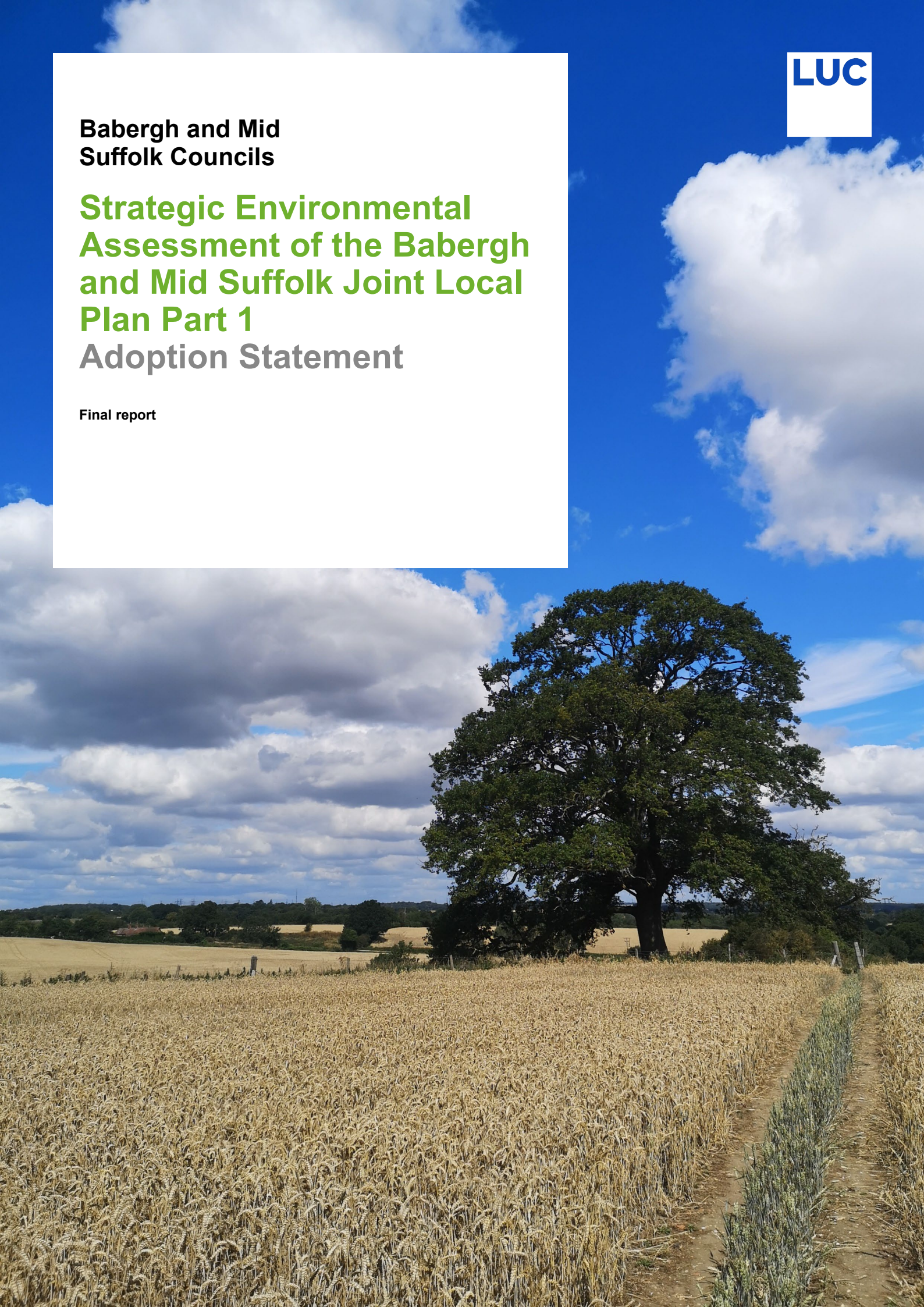


**Babergh and Mid
Suffolk Councils**

**Strategic Environmental
Assessment of the Babergh
and Mid Suffolk Joint Local
Plan Part 1
Adoption Statement**

Final report



Babergh and Mid Suffolk Councils

Strategic Environmental Assessment of the Babergh and Mid Suffolk Joint Local Plan Part 1 Adoption Statement

Project Number
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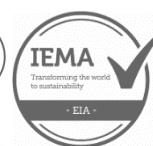
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Chapter 1

Introduction

1.1 Babergh and Mid Suffolk District Councils adopted the Joint Local Plan (Part 1) in November 2023.

1.2 During the preparation of the Joint Local Plan (JLP), the Councils were required by law to carry out a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA) of the JLP as it developed. Both the SA and SEA requirements were met through a single integrated process (referred to as SA), the method and findings of which were described in a number of SA reports which were published alongside the different versions of the JLP during its development.

1.3 Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) requires the Councils to make the final SA Report available alongside the adopted JLP.

1.4 The SA Report for the Pre-Submission (Regulation 19) JLP (October 2020) was published alongside the JLP for public consultation between November and December 2020. That SA Report was later submitted alongside the JLP for examination in March 2021.

1.5 Examination hearings took place in June, September and October 2021, following which schedules of Main and Minor Modifications to the submitted JLP were prepared and published for public consultation between March and May 2023. An updated SA Report (February 2023) was prepared and published alongside the Main Modifications during the consultation period. That SA Report presented an appraisal of the JLP as proposed to be modified, updating the appraisal findings presented previously in the October 2020 SA Report. It therefore comprises the final SA report for the adopted Babergh and Mid Suffolk JLP, along with the Non-Technical Summary of the SA Report.

1.6 Further hearing sessions were held in June 2023. Following these, some minor amendments were made to the detailed wording of the Main Modifications and consequential modifications were made where these were necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or affects the Sustainability Appraisal that has been undertaken.

1.7 It should be noted that the adopted JLP is referred to as the JLP: Part 1. This is because certain sections of the submitted JLP were removed from the Plan through Main

Modifications following discussions during the examination process and will instead be addressed in a forthcoming JLP: Part 2. Therefore, earlier SA reports referred only to the JLP, while this Adoption Statement refers to the adoption of the JLP: Part 1.

Requirement for the Adoption Statement

1.8 In addition to the requirement in Regulation 26 of the Town and Country Planning (England) Regulations (2012) for the final SA report to be published alongside the adopted Plan, the SEA Regulations¹ also require a number of steps to be taken upon adoption of a plan (in this case the Babergh and Mid Suffolk JLP: Part 1). Specifically, SEA Regulation 16 sets out the post adoption procedures and requirements for SEA. The planning authority must, as soon as is reasonably practicable after the adoption of a plan for which an SA/SEA has been carried out, make a copy of the plan publicly available alongside a copy of the SA report and an 'SEA adoption statement', and inform the public, Historic England, Natural England and the Environment Agency about the availability of these documents. The SEA Adoption Statement must explain:

- How environmental (and sustainability) considerations have been integrated into the Plan.
- How the Environmental Report has been taken into account during the preparation of the Plan.
- How the opinions expressed by the public and consultation bodies during consultation on the plan and the Environmental Report have been taken into account.
- The reasons for choosing the Plan as adopted, in the light of other reasonable alternatives considered.
- The measures that are to be taken to monitor the significant environmental and sustainability effects of the implementation of the Plan.

1.9 As the SEA process was incorporated into the SA process, this document constitutes the SA/SEA Adoption Statement for the JLP: Part 1. The remainder of the document is structured according to the SEA Regulation requirements listed above as follows:

- **Chapter 2** summarises how environmental considerations have been integrated into the JLP: Part 1 including by explaining who carried out the SA/SEA and what assessment framework was used.

- **Chapter 3** summarises how the Environmental Report has been taken into account, considering the links between the plan-making and SA/SEA processes.
- **Chapter 4** summarises the consultation opinions provided on the Environmental Report at each stage and describes how the results were taken into account.
- **Chapter 5** describes why the Adopted JLP: Part 1 was chosen, in light of the other reasonable alternatives dealt with.
- **Chapter 6** describes how the significant environmental effects of the implementation of the JLP: Part 1 will be monitored.

¹ The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633) as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit)

Regulations 2018 (SI 2018/1232) and The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 (SI 2020/1531)

Chapter 2

How environmental considerations have been integrated into the JLP: Part 1

2.1 The SA (incorporating SEA) process for the Babergh and Mid Suffolk JLP: Part 1 dates back to January 2017 when BMSDC prepared the first SA/SEA Scoping Report for the JLP. In August 2017, BMSDC identified a series of high-level policy options that were subject to appraisal at that time. These fell into the following broad themes: housing, economy, environment, infrastructure and place.

2.2 A second SA Scoping Report was prepared by Place Services on behalf of the Councils in April 2019, and subject to public consultation. In July 2019, Place Services carried out a comprehensive appraisal of detailed spatial strategy and policy options. The SA at this stage also included the appraisal of a large number of site options for potential allocation in the JLP.

2.3 Following on from this stage of SA work, BMSDC decided it would be prudent and helpful to consider afresh the range of reasonable alternatives for all aspects of the JLP. This was to ensure that the appraisal of the preferred approach and the reasonable alternatives was as objective and robust as reasonably practical, and to identify whether any amendments should be made to the preferred approach. The ultimate aim was to provide BMSDC with the confidence and reassurance that the preferred JLP as proposed to be submitted was an appropriate plan when compared to the reasonable alternatives.

2.4 From November 2019, LUC provided SA/SEA support to BMSDC, initially reviewing the SA work that had been completed to date and also carrying out a further round of SA Scoping consultation in March 2020. LUC then prepared the SA Report for the Pre-Submission (Regulation 19) JLP in October 2020. As well as an appraisal of that version of the JLP, the SA Report presented some further work that LUC had undertaken on the JLP options. As a result of LUC's review of the earlier SA work it was decided to review the range of spatial strategy options and subject them to appraisal again. As part of this process, LUC identified information gaps with respect to landscape evidence and historic environment evidence. BMSDC therefore commissioned detailed studies to ensure that the findings could inform the SA. The results of LUC's appraisal of reasonable alternatives were reported in the October 2020 SA Report. As a result of this round of SA, a number of changes were made to the preferred approach of the JLP, as presented in the Pre-Submission document.

2.5 The purpose of the SA was to assist BMSDC in preparing the JLP by identifying the key sustainability issues that face Babergh and Mid Suffolk, to predict what the likely effects of the JLP on these issues would be and to put forward recommendations to mitigate and monitor any negative effects identified. The aim was to help ensure that the JLP has as many positive effects as possible and that any negative effects are avoided or mitigated as far as reasonably possible alongside implemented policies, particularly those resulting in new development within Babergh and Mid Suffolk.

2.6 The SA was undertaken iteratively, such that at each stage of the JLP's preparation, the sustainability and environmental effects of the options for the Plan were assessed. SA reports were produced to describe the approach taken, identify the likely effects of the JLP and make recommendations as to how significant negative effects could be avoided and mitigated and significant positive effects enhanced. In this way, environmental and sustainability considerations were integrated into the JLP as it was developed. **Chapter 3** expands on how the findings of the SA process have been taken into account throughout the plan-making process.

2.7 The way in which the environmental and sustainability effects of the JLP were consistently described, analysed and compared was through the use of a set of SA objectives referred to as an 'SA framework'. The SA framework that was used to appraise the JLP is presented in **Table 2.1** overleaf. It was originally developed by BMSDC and then refined by Place Services from the analysis of international, national and local policy objectives, baseline information, and key sustainability issues identified in the Plan area. As a result of the review of the earlier SA work undertaken for the JLP, LUC proposed some refinements to the original SA framework developed by BMSDC and by Place Services. These refinements were only minor because the SA framework, in LUC's view, was robust and accurately reflected the key sustainability issues identified in both Districts, whilst covering all the SEA Topics. Additionally, adhering broadly to the original SA framework would maintain consistency with the previous SA work. Some further minor amendments were made to the SA framework following the March 2020 Scoping consultation (these are all reflected in the SA framework shown overleaf).

2.8 The final column of **Table 2.1** shows how the 'SEA topics' (listed in Schedule 2 of the SEA Regulations as the topics to be covered in SEAs) were all covered by at least one of the SA objectives.

Habitats Regulations Assessment

2.9 The JLP was also required to be subject to Habitats Regulations Assessment (HRA) under the Conservation of

Habitats and Species Regulations 2017 (as amended) (and previous versions of these Regulations, as applicable at the time of preparing each stage of the HRA). The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European designated site for nature conservation and to ascertain whether it would adversely affect the integrity of that site. The HRA process for the JLP was undertaken and reported on separately from the SA but the findings were reflected in the SA reports.

The HRA Report that was submitted alongside the JLP for examination was prepared by Place Services on behalf of BMSDC in October 2020 in relation to the Regulation 19 JLP. An updated HRA Report was prepared by Place Services in February 2023 to consider the implications of the proposed Main Modifications for the HRA findings reported previously. It concluded that the JLP: Part 1 would have no adverse effects on the integrity of any European sites, either alone or in combination with other plans or projects.

Chapter 2

How environmental considerations have been integrated into the JLP: Part 1

Strategic Environmental Assessment of the Babergh and Mid Suffolk

Table 2.1: SA framework used for the SA of the Babergh and Mid Suffolk JLP

SA objective	Guide Questions	Relevant SEA Topics
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	(1.1) Will it improve access to health facilities and social care services? (1.2) Will it encourage healthy lifestyles? (1.3) Will it support special needs and an ageing population? (1.4) Will it increase access to open countryside? (1.5) Will it increase access to public open space? (1.6) Will it improve access to cultural facilities? (1.7) Will it improve access to community facilities? (1.8) Will it reduce crime and anti-social activity? (1.9) Will it reduce noise and odour concerns? (1.10) Does the proposal explore opportunities for shared community use and co-location of services? (1.11) Does the proposal retain and enhance existing open and natural spaces? (1.12) Does the proposal provide a range of play spaces for children and young people?	Population Human Health Material Assets
2. To maintain and improve levels of education and skills in the population overall.	(2.1) Will it improve qualifications and skills of young people and adults? (2.2) Will it support the provision of an adequate range of educational and childcare facilities? / Does the proposal provide childcare facilities? (2.3) Does the proposal contribute to meeting primary, secondary and post 19 education needs?	Population Human Health Material Assets
3. To reduce poverty and social exclusion and ensure access to jobs and services.	(3.1) Will it reduce poverty and social exclusion in those areas most affected? (3.2) Will it maintain and improve access to key services and facilities for all sectors of the population? / Does the proposal retain or re-provide existing social infrastructure? (3.3) Will it reduce unemployment overall? (3.4) Does the proposal include a mix of uses and a range of community facilities? (3.5) Does the proposal include adaptable homes?	Population Human Health

Chapter 2

How environmental considerations have been integrated into the JLP: Part 1

Strategic Environmental Assessment of the Babergh and Mid Suffolk

SA objective	Guide Questions	Relevant SEA Topics
4. To meet the housing requirements of the whole community.	(4.1) Will it meet the housing requirements of the whole community? (4.2) Will it reduce homelessness? (4.3) Will it contribute to meeting demand for a range and mix of housing including affordable housing and specialist housing? (4.4) Will it reduce the number of unfit homes? (4.5) Does the proposal include homes that can be adapted to support independent living for older and disabled people? (4.6) Does the proposal address the housing needs of older people, i.e. extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes?	Population Human Health Material Assets
5. To conserve and enhance water quality and resources.	(5.1) Will it protect and enhance water resources? (5.2) Will it support the achievement of Water Framework Directive targets? (5.3) Will it protect and improve the quality of inland waters? (5.4) Will it protect and improve the quality of coastal waters? (5.5) Will it promote sustainable use of water? (5.6) Will it maintain water availability or water dependent habitats? (5.7) Will it support the provision of sufficient water supply and treatment infrastructure? (5.8) Does the proposal incorporate sustainable design and construction techniques?	Water Biodiversity, Fauna and Flora Material Assets
6. To maintain and where possible improve air quality and reduce noise pollution.	(6.1) Will it protect and improve air quality? (6.2) Does the proposal minimise noise pollution caused by traffic and commercial uses? (6.3) Will it avoid exacerbating existing air quality issues in designated AQMAs? (6.4) Does the proposal incorporate sustainable design and construction techniques?	Air Human Health
7. To conserve soil and mineral resources.	(7.1) Will it minimise the loss of open countryside to development? (7.2) Will it minimise loss of the best and most versatile agricultural land to development? (7.3) Does the proposal make best use of existing land?	Soil Material Assets

Chapter 2

How environmental considerations have been integrated into the JLP: Part 1

Strategic Environmental Assessment of the Babergh and Mid Suffolk

SA objective	Guide Questions	Relevant SEA Topics
	(7.4) Will it maintain and enhance soil quality? (7.5) Will the proposals minimise the sterilisation of minerals resources?	
8. To promote the sustainable management of waste.	(8.1) Will it reduce household waste generated /head of population? (8.2) Will it reduce commercial and industrial waste generated /head of population? (8.3) Will it increase rate /head of population of waste reuse and recycling? / Does the proposal encourage recycling (including building materials)? (8.4) Does the proposal incorporate sustainable design and construction techniques?	Material Assets
9. To reduce contribution to climate change.	(9.1) Will it reduce emissions of greenhouse gases /head of population by reducing energy consumption? (9.2) Will it increase the proportion of energy needs being met by renewable sources? (9.3) Does the proposal incorporate renewable energy? (9.4) Does the proposal contain homes that are highly energy efficient? (9.5) Will it reduce people's reliance on the private car through greater accessibility to sustainable modes of transport (e.g. rail, bus and walking)? (9.6) Will it accommodate electric vehicles?	Climatic Factors
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	(10.1) Will it minimise the risk of flooding to people, property and infrastructure from rivers and watercourses? (10.2) Will it minimise the risk of flooding to people, property and infrastructure on the estuary? (10.3) Will it reduce the risk of estuarine erosion? (10.4) Will it reduce the risk of damage to people, property and infrastructure from extreme weather events? (10.5) Does the proposal incorporate sustainable design and construction techniques? (10.6) Does the proposal ensure that buildings and public spaces are designed to respond to winter and summer temperatures, i.e. ventilation, shading and landscaping? (10.7) Does the proposal incorporate sustainable urban drainage techniques?	Water Climatic Factors Human Health Biodiversity, Flora and Fauna Material Assets
11. To conserve and enhance biodiversity and geodiversity.	(11.1) Will it maintain and enhance European designated nature conservation sites? (11.2) Will it maintain and enhance nationally designated nature conservation sites?	Biodiversity, Flora and Fauna

Chapter 2

How environmental considerations have been integrated into the JLP:
Part 1

Strategic Environmental Assessment of the Babergh and Mid Suffolk

SA objective	Guide Questions	Relevant SEA Topics
	<p>(11.3) Will it maintain and enhance locally designated nature conservation sites?</p> <p>(11.4) Will it avoid disturbance or damage to protected species and their habitats?</p> <p>(11.5) Will it help deliver the targets and actions for habitats and species within the Suffolk Biodiversity Action Plan?</p> <p>(11.6) Will it help to reverse the national decline in farmland birds?</p> <p>(11.7) Will it protect and enhance sites, features and areas of geological value in both urban and rural areas?</p> <p>(11.8) Will it ensure ecological networks are not compromised, and future improvements are not prejudiced?</p> <p>(11.9) Will it lead to measurable net gain for biodiversity?</p> <p>(11.10) Will it ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced?</p>	
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	<p>(12.1) Will it protect and enhance buildings, monuments, sites, places, areas and landscapes of heritage interest or cultural value (including their setting) meriting consideration in planning decisions?</p> <p>(12.2) Will it protect and enhance sites, features and areas of archaeological value in both urban and rural areas?</p> <p>(12.3) Will it enhance accessibility to cultural heritage assets?</p>	Cultural Heritage, Architectural and Archaeological Heritage
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	<p>(13.1) Will it conserve and enhance the AONB and its setting?</p> <p>(13.2) Will it reduce the amount of derelict, degraded and underused land?</p> <p>(13.3) Will it protect and enhance the settlement and its setting within the landscape? / Will it protect and enhance landscape character / Will it protect and enhance valued landscapes?</p>	Landscape Cultural Heritage, Architectural and Archaeological Heritage
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	<p>(14.1) Will it improve business development and enhance competitiveness?</p> <p>(14.2) Will it improve the resilience of business and the economy?</p> <p>(14.3) Will it promote growth in key sectors?</p> <p>(14.4) Will it improve economic performance in disadvantaged areas?</p> <p>(14.5) Will it encourage rural diversification?</p> <p>(14.6) Will it encourage indigenous business?</p>	Population Human Health Material Assets

Chapter 2

How environmental considerations have been integrated into the JLP:
Part 1

Strategic Environmental Assessment of the Babergh and Mid Suffolk

SA objective	Guide Questions	Relevant SEA Topics
	(14.7) Will it encourage inward investment? (14.8) Will it make land available for business development? (14.9) Is there a range of retail uses, including food stores and smaller affordable shops for social enterprises? (14.10) Does the proposal include managed and affordable workspace for local businesses?	
15. To revitalise the Districts' town centres.	(15.1) Will it increase the range of employment opportunities, shops and services available in town? (15.2) Will it decrease the number of vacant units in town centres? (15.3) Will it enhance the viability and vitality of the Districts' centres?	Population Material Assets
16. To encourage efficient patterns of movement and modal shift towards sustainable modes of transport.	(16.1) Will it reduce commuting? (16.2) Will it improve accessibility to work by public transport, walking and cycling? (16.3) Would it promote the use of sustainable travel modes and reduce dependence on the private car, including enabling the provision or enhancement of public transport in rural areas? (16.4) Will it increase the proportion of freight transported by rail or other sustainable modes?	Population Air Human Health Climatic Factors Material Assets

Chapter 3

How the Environment Report has been taken into account

3.1 As explained in the previous chapter, the SA process for the Babergh and Mid Suffolk JLP was undertaken iteratively, with the SA reports prepared at each stage informing the preparation of the Plan. As part of the SA process, an assessment of the sustainability and environmental effects was made at each stage of the JLP's development.

3.2 The SA assessed all policies and proposals in each iteration of the JLP and their reasonable alternatives, including the modifications made to the JLP following its submission. This helped BMSDC to formulate their approach with regards to which options to take forward, alongside other material planning considerations.

3.3 **Table 3.1** overleaf shows how preparation of the SA reports (which included the Environmental Report requirements set out in the SEA Regulations) corresponded with each stage of the JLP's preparation, and how the SA was taken into account.

Chapter 3

How the Environment Report has been taken into account

Strategic Environmental Assessment of the Babergh and Mid Suffolk
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Table 3.1: Iterations of the Babergh and Mid Suffolk JLP and accompanying SA outputs

JLP consultation stage and documents	SA documents	How SA was taken into account
Babergh District Council and Mid Suffolk District Council Joint Local Plan Consultation Document Reg. 18 (August 2017)	Babergh and Mid Suffolk Joint Local Plan: Sustainability Appraisal (August 2017)	<p>At this initial stage the JLP Consultation Document set out the amount of growth that needs to be planned for, options for where growth should go and how it should be delivered. It was primarily based upon and in conformity with current and emerging national planning policy and legislation. The options identified in the JLP Consultation Document were of a strategic, high-level nature.</p> <p>The options that were subject to appraisal fell into the following broad themes: housing, economy, environment, infrastructure and place. Under 'housing' this included the appraisal of a range of spatial distribution options. This SA work was published in the August 2017 SA Report for consultation alongside the JLP.</p>
Babergh District and Mid Suffolk District Councils Joint Local Plan 2016- 2036 – Regulation 18 (Preferred Options) (July 2019)	Babergh District and Mid Suffolk District Councils Joint Local Plan 2016- 2036 – Regulation 18 (Preferred Options) Sustainability Appraisal Environmental Report (June 2019)	In this SA report, Place Services carried out a comprehensive appraisal of detailed spatial strategy and policy options. The SA at this stage also included the appraisal of a large number of site options for potential allocation in the JLP.
N/A	SA Addendum (July 2019)	An SA Addendum was produced by Place Services as a result of some errors and site omissions in the Reg. 18 Preferred Options SA (July 2019).
Pre-Submission (Regulation 19) JLP (November – December 2020).	SA Report for the Regulation 19 JLP (October 2020).	<p>LUC was appointed in November 2019 to review the appraisal work undertaken to date. As a result of this it was decided to review the range of spatial strategy options and subject them to appraisal again. As part of this process, LUC identified information gaps with respect to landscape evidence and historic environment evidence. BMSDC therefore commissioned detailed studies to ensure that the findings could inform the SA.</p> <p>The results of LUC's appraisal of reasonable alternatives were reported in the October 2020 SA Report. The October 2020 SA Report also included an appraisal of the current Pre-Submission version of the JLP including</p>

Chapter 3

How the Environment Report has been taken into account

Strategic Environmental Assessment of the Babergh and Mid Suffolk
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JLP consultation stage and documents	SA documents	How SA was taken into account
		policies and site allocations. The SA findings for the previous iteration of the JLP, along with other factors, contributed to the Council's decision making regarding which policies and site allocations were included in the Pre-Submission Joint Local Plan.
Submission to the Secretary of State (March 2021)	October 2020 Regulation 19 SA Report Submitted with the JLP in March 2021.	No new SA work was carried out at this stage.
Examination March 2021 – September 2023. Babergh and Mid Suffolk JLP: Part 1 – Modifications Schedule (March 2023).	SA Report for the JLP Main Modifications (February 2023).	<p>Following examination hearings in June, September and October 2021, BMSDC prepared a schedule of Main Modifications to the submitted JLP (now referred to as the JLP: Part 1). The Main Modifications were subject to SA by LUC and the findings were presented in an SA Report (February 2023). The SA Report reflected the removal of large parts of the submitted JLP, including site allocations, through the schedule of Main Modifications. The SA concluded that the JLP as proposed to be modified was likely to have a range of positive effects and, while it may also have some negative effects, these were generally considered unlikely to be significant. The SA recognised that at the site level there could be issues to address, but that there are safeguards in the JLP that could be used to mitigate such effects. It was also noted that such issues will be considered further in the SA of the forthcoming Part 2 JLP.</p> <p>In light of these overall findings and the existing recommendations made through the course of the SA and the wider plan-making process, no further SA recommendations were considered necessary.</p>
Adopted Babergh and Mid Suffolk JLP: Part 1 (November 2023).	SEA Adoption Statement (November 2023).	<p>This Adoption Statement summarises the SA/SEA process and how this has influenced the preparation of the Babergh and Mid Suffolk JLP: Part 1.</p> <p>Following consultation on the Main Modifications and the associated SA Report, the Inspector's Report concluded that, with the inclusion of the recommended modifications, the JLP: Part 1 satisfies the requirements of Section 20 (5) of the Planning and Compulsory Purchase Act 2004 and meets the criteria for soundness in the National Planning Policy Framework. No further SA work was required following the publication of this report.</p>

Chapter 4

How opinions of consultation bodies and the public have been taken into consideration

4.1 At each stage of the Babergh and Mid Suffolk JLP's development, an SA Report was published alongside the JLP document for consultation with the public and the consultation bodies specifically referred to in the SEA Regulations (i.e. Historic England, the Environment Agency and Natural England). The SEA Regulations require that the SEA Adoption Statement provides an account of how any opinions expressed by the public and the consultation bodies have been taken into account.

4.2 The JLP consultation stages and responses received relating to the SA documents are summarised below.

SA Scoping Report for the JLP (January 2017)

4.3 The SA Scoping Report was subject to consultation in early 2017, including formal consultation with the SEA statutory bodies (Historic England, the Environment Agency and Natural England). This provided an opportunity for consultees to comment on the proposed scope of the SA, including whether the objectives in the SA framework provided a reasonable framework for assessing the likely significant effects of the JLP and whether the review of relevant plans, policies and programmes (the 'PPP' review) and baseline information were appropriate and complete.

4.4 Comments received on the SA scoping were taken into consideration by BMSDC and addressed in the SA Report for the Regulation 18 JLP in August 2017. Comments related to suggestions for additional plans, policies and programmes to include; amendments to indicators and terminology; and additional baseline information to include.

Babergh District Council and Mid Suffolk District Council Joint Local Plan Consultation Document Reg. 18 (August 2017)

4.5 This SA Report was prepared by BMSDC in relation to the Regulation 18 consultation document and it was consulted upon alongside the JLP with the statutory bodies and Suffolk County Council. The responses received were taken into account by BMSDC in preparing the next iteration of the JLP.

SA Scoping Report for the JLP (April 2019)

4.6 An updated SA Scoping Report was prepared by Place Services on behalf of BMSDC in April 2019 and subject to

Chapter 4

How opinions of consultation bodies and the public have been taken into consideration

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consultation with Historic England, the Environment Agency and Natural England. Comments received on the updated SA Scoping Report were taken into consideration by BMSDC and addressed in the June 2019 SA Report for the Regulation 18 (Preferred Options) JLP. Appendix 2 of that SA Report summarises the Scoping consultation comments and the changes made in the SA as a result. In particular, some additional documents were included in the review of plans, policies and programmes and further sources of baseline information were taken into account. This information was also presented in Appendix A of the updated SA Scoping Report in March 2020.

Babergh District and Mid Suffolk District Councils Joint Local Plan 2016- 2036 – Regulation 18 (Preferred Options) (June 2019)

4.7 This SA Report was prepared by Place Services on behalf of BMSDC in relation to the Regulation 18 (Preferred Options) consultation document and it was published alongside the JLP during the consultation period.

4.8 A record of the responses received and how they were taken into account was provided in the updated SA Scoping Report in March 2020. However, many of the comments were superseded by the fact that LUC had now undertaken reappraisal of the sites and options.

SA Addendum (July 2019)

4.9 An SA Addendum was produced by Place Services as a result of some errors and site omissions in the Reg. 18 Preferred Options SA. A record of the small number of responses received, and how they were taken into account, was provided in the updated SA Scoping Report in March 2020. None of the comments made resulted in any changes being needed to the SA.

SA Scoping Report for the JLP (March 2020)

4.10 The most recent SA Scoping Report prepared by LUC in March 2020 presented an up-to-date review of the plans, policies and programmes of relevance to the JLP; updated baseline information; updated key sustainability issues; and the SA framework.

4.11 The SA Scoping Report was published for consultation in April 2020 with the three statutory consultees (Natural England, the Environment Agency and Historic England), as well as a number of other stakeholders identified by the Councils and members of the public.

4.12 Appendix A in the October 2020 SA Report for the Pre-Submission JLP lists the comments that were received during the consultation on the March 2020 SA Scoping Report and describes how each one was addressed during the

preparation of that subsequent report. In light of the comments received, a number of amendments were made to the review of plans, policies and programmes, the baseline information, key sustainability issues and SA framework.

SA Report for the Pre-Submission (Regulation 19) JLP (October 2020)

4.13 The SA Report for the Pre-Submission (Regulation 19) JLP (October 2020) accompanied the JLP for Regulation 19 consultation between November and December 2020. The consultation responses received in relation to the SA Report were reviewed by LUC. Many of the consultation comments focussed on the appraisal of specific sites that had been selected or rejected for allocation, including a number of comments from site owners and promoters. Such queries were checked to ensure that the information presented in the SA was factually correct and consistent.

4.14 This SA Report was submitted alongside the JLP for examination in March 2021.

Main Modifications SA Report (February 2023)

4.15 Following the examination hearings in June, September and October 2021, an SA Report (February 2023) was prepared and published for public consultation alongside BMSDC's schedule of Main Modifications between March and May 2023. This SA Report presented an appraisal of the JLP as proposed to be modified (no reasonable alternatives to the proposed modifications were identified for appraisal at this stage).

4.16 Consultation comments were received from various organisations, developers and members of the general public, most of which related to the Main Modifications themselves rather than the accompanying SA. The consultation comments received in relation to the Main Modifications were sent to the Inspectors for consideration in preparing the Inspector's report.

Chapter 5

Why the adopted Local Plan was chosen in light of the other reasonable alternatives dealt with

5.1 BMSDC considered a range of reasonable alternative options during the preparation of the JLP, in particular in relation to strategic policies addressing the scale and distribution of growth. It should be noted that this Adoption Statement focuses on the alternatives that were considered in relation to those aspects of the JLP that remain in the adopted Part 1 Plan. Options that were appraised and considered in earlier iterations of the SA in relation to aspects of the JLP that will now be considered as part of the forthcoming Part 2 Plan, such as site allocation options, are not addressed here.

5.2 Information considered by BMSDC before final decisions were made included:

- the SA findings, particularly the significant effects generated by each option;
- the JLP vision and objectives;
- the results of consultation and engagement with the general public and key stakeholders; and
- the evidence base for the JLP.

5.3 The JLP Plan sets the spatial vision of the place that Babergh and Mid Suffolk will become by 2037 based upon the following key priorities:

- Enabling sustainable economic growth.
- Enhancing and protecting the environment.
- Delivering appropriate housing through existing commitments and windfall development.
- Supporting strong and healthy communities and delivering Infrastructure.

5.4 The approach within the Plan has been informed by a range of evidence-base studies and the Sustainability Appraisal.

5.5 Strategically the JLP sets out to address identified issues for cooperation with both neighbouring authorities and statutory partners and infrastructure providers. Collective resolution has been agreed on all the identified issues as detailed in the statements of common ground.

Level of growth

5.6 The Plan sets out to meet both Babergh and Mid Suffolk's objectively assessed needs. The standard method is used to provide the housing requirements of the plan for both districts. Prior to Examination, it was considered that no exceptional circumstances had been identified to justify an alternative approach to the standard method. During the Examination, the Inspector requested that SA work was undertaken in relation to two alternative options for the housing figure:

- 2021 standard method figure (slightly lower than the submitted JLP figure which was based on the 2020 OAN)
- High uplift (20%) to 2020 standard method and JLP figure

5.7 The standard method provides a significant increase (approximately 30-40%) in housing requirements for both districts against saved Core Strategy policies. The Government has acknowledged the significant challenges of increasing the rate of delivery for local authorities and accordingly the standard method sets a 40% increase as a cap on new housing requirements.

5.8 In recent years both Babergh and Mid Suffolk has been below the adopted level of housing requirement and delivery of the level of housing OAN is a key challenge. However, a substantial number of the dwellings required are already permitted which will contribute to meeting the overall requirement. The Part 2 JLP will allocate sites to give greater confidence to meeting delivery targets and an ongoing five year land supply.

5.9 In consideration of the challenges of meeting the required uplift to deliver the OAN it is not considered reasonable nor sustainable to pursue a housing target in excess of that set out in the JLP: Part 1.

5.10 Economically, projections of need are limited in terms of land area and consequently the Plan seeks to provide a supportive and flexible approach to economic development. A status quo is sought to be maintained in supporting current employment uses and the network of town centres across both Districts. Further there is flexibility to net growth on strategic employment sites.

Other key policy objectives and issues

5.11 The various stages of developing the Sustainability Appraisal have provided an iterative and rational method for refining the options considered throughout the JLP process.

5.12 Based on the overarching objectives of the JLP policies, and informed through the supporting evidence and the

Sustainability Appraisal, the policies framework seeks to ensure the delivery of appropriate housing, enabling sustainable economic growth, enhancing and protecting the environment, supporting strong and healthy communities and delivering infrastructure. The various SA Reports published during the preparation of the plan have shown that reasonable and alternative options have been considered and evaluated.

Chapter 6

How the significant environmental effects of the implementation of the Local Plan will be monitored

6.1 The SEA Regulations require that *“The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action”* (Regulation 17), and that the Environmental Report should provide information on *“a description of the measures envisaged concerning monitoring”* (Schedule 2).

6.2 Although national Planning Practice Guidance states that monitoring should be focused on the significant environmental effects of implementing the Plan, the reason for this is to enable local planning authorities to identify unforeseen adverse effects at an early stage and to enable appropriate remedial actions. Since effects which the SA expects to be minor may become significant and vice versa, monitoring measures have been proposed in relation to all of the SA objectives in the SA framework. As the JLP: Part 1 is implemented and the likely significant effects become more certain, the Councils may wish to narrow down the monitoring framework to focus on those effects of the JLP: Part 1 likely to be significantly adverse.

6.3 **Table 6.1** shows the indicators to be used by BMSDC to monitor the potential sustainability effects of implementing the JLP: Part 1.

Table 6.1: Proposed monitoring indicators

SA Objectives	Proposed Monitoring Indicators
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	<ul style="list-style-type: none"> ■ Performance against relevant indices of multiple deprivation indicators ■ Percentage of adult participation in sport ■ Obesity levels ■ Access to doctors surgeries and average wait times for appointments ■ Number of S.106 contributions secured for health, education and community services ■ Residents' opinions on availability of open space/leisure facilities ■ Life expectancy ■ Net additional number of dwellings meeting space standards ■ Net additional new homes built to accessible and adaptable dwelling standards (Part M4(2)) ■ Net losses or gains of open space by sqm ■ Net loss/gain of community services and facilities ■ Net change of use of land to Use Class F (either for full flexibility or one or more uses within Use Class F) ■ Net loss/gain of health and educational uses
1. To maintain and improve levels of education and skills in the population overall.	<ul style="list-style-type: none"> ■ GCSE or equivalent performance ■ Level 2 qualifications by working age residents ■ Level 4 qualifications and above by working age residents ■ Employment status of residents ■ Net additional square metres of educational floorspace by primary, secondary, further, higher and vocational levels ■ S.106 contributions secured for education and training services ■ Average gross weekly earnings ■ Number of young people in higher or further education or vocational levels ■ Performance against relevant indices of multiple deprivation indicators ■ Net change of use of land to Use Class F (either for full flexibility or one or more uses within Use Class F) ■ Net loss/gain of health and educational uses
2. To reduce poverty and social exclusion and ensure access to jobs and services.	<ul style="list-style-type: none"> ■ Employment/unemployment rate in both Districts ■ % of population within 30 minute public transport time of educational, healthcare and community facilities ■ S.106 contributions accumulated per annum for improvements to public transport, leisure services, education, health and community services ■ Performance against relevant indices of multiple deprivation indicators ■ Net additional new homes built to accessible and adaptable dwelling standards (Part M4(2))
3. To meet the housing requirements of the whole community.	<ul style="list-style-type: none"> ■ Net additional new housing ■ Number of windfall homes completed ■ Local Affordability Ratio ■ Five-Year Housing Land Supply (expressed as a percentage and years) ■ Housing Delivery Test (expressed as a percentage) ■ Percentage of each dwelling type, size and tenure of development completed

Chapter 6

How the significant environmental effects of the implementation of the Local Plan will be monitored

Strategic Environmental Assessment of the Babergh and Mid Suffolk

SA Objectives	Proposed Monitoring Indicators
	<ul style="list-style-type: none"> ■ Net additional affordable housing, including percentage of community-led and rural exception housing, and as percentage of total net additional new housing ■ Number of eligible schemes not achieving 35% affordable housing ■ Statutory Homelessness ■ Net additional number of dwellings meeting space standards ■ Net additional new homes built to accessible and adaptable dwelling standards (Part M4(2)) ■ Net additional care/nursing homes ■ Net additional sheltered homes ■ Net gain and loss of rural workers housing with restrictions ■ Net addition of Gypsy and Traveller pitches and travelling show people plots ■ Number of households registered on the 'Self-Build Register' ■ Number of serviced dwelling plots completed, for self/custom build
4. To conserve and enhance water quality and resources.	<ul style="list-style-type: none"> ■ Percentage of permissions that meet improved water efficiency standards ■ BREEAM certifications on non-residential development over 1,000 sqm ■ Number of new developments incorporating Sustainable urban Drainage Systems (SuDS) ■ Adoption of Water Resources Management Plan by water companies ■ Water use per household ■ Water pollution incidents recorded by the Environment Agency ■ Percentage of water bodies at good ecological status or potential ■ Percentage of water bodies at good or high biological status ■ Percentage of water bodies at good chemical status
5. To maintain and where possible improve air quality and reduce noise pollution.	<ul style="list-style-type: none"> ■ Percentage of journeys to work by public transport or active transport ■ Air pollution data ■ Road and rail noise levels produced by Defra
6. To conserve soil and mineral resources.	<ul style="list-style-type: none"> ■ Net percentage of development (in hectares) taking place on previously developed land ■ Amount of agricultural land in hectares permitted for non-agricultural use ■ Number of planning applications approved within a Minerals Consultation Area
7. To promote the sustainable management of waste.	<ul style="list-style-type: none"> ■ Non-recyclable waste generation per capita ■ Percentage of household waste that was reused, recycled or composted
8. To reduce contribution to climate change.	<ul style="list-style-type: none"> ■ Percentage of permissions that meet the Target Emission Rate ■ BREEAM certifications on non-residential development over 1,000 sqm ■ Number of renewable energy schemes permitted and net additional (kW/MW) generated ■ Number of community-led renewable energy schemes permitted and net additional (kW/MW) generated ■ Percentage of energy supplied from renewable sources ■ Percentage of journeys made by public transport or active transport ■ Energy consumption GWh/household ■ Air Quality Management Areas ■ Nitrogen dioxide emissions ■ PM2.5 emissions

Chapter 6

How the significant environmental effects of the implementation of the Local Plan will be monitored

Strategic Environmental Assessment of the Babergh and Mid Suffolk

SA Objectives	Proposed Monitoring Indicators
	<ul style="list-style-type: none"> ■ PM10 emissions
9. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	<ul style="list-style-type: none"> ■ Development identified in Flood Zones 2 and/or 3 ■ Number of new developments incorporating Sustainable urban Drainage Systems (SuDS) ■ Incidence of flood warnings in site area
10. To conserve and enhance biodiversity and geodiversity.	<ul style="list-style-type: none"> ■ Number and hectares of Sites of Special Scientific Interest (SSSI) ■ Percentage of Districts' SSSIs in a favourable or unfavourable condition ■ Specific environmental indicators to be set out in Suffolk Coast Recreational disturbance Avoidance and Mitigation Strategy ■ Condition Status of all designated habitat sites and protected species ■ Net loss of designated sites and protected species ■ Measurable net gain in biodiversity (10%) ■ Net loss of ancient/veteran trees (Tree Preservation Orders) ■ Net loss of ancient woodland ■ Air Quality Management Areas and threshold areas. Where appropriate, nitrogen dioxide and ammonia monitoring from any road 300m from SPA [Ipswich Strategic Transport Mitigation Strategy]) ■ Delivery of projects identified through the Recreational disturbance Avoidance and Mitigation Strategy ■ Achievement of Biodiversity Action Plan targets
11. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	<ul style="list-style-type: none"> ■ Number of Listed Buildings ■ Number of Scheduled Monuments ■ Number of Conservation Areas ■ Number of Archaeological Priority Areas ■ Number of entries on Heritage at Risk list ■ Number of entries removed from Heritage at Risk list ■ Number of non-designated heritage assets ■ Number of planning applications approved in Archaeological Priority Areas
12. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	<ul style="list-style-type: none"> ■ Number of major applications granted within the Areas of Outstanding Natural Beauty ■ Developments permitted contrary to Landscape Sensitivity Assessment (sites with high sensitivity) ■ Percentage of development built on brownfield sites/previously developed land ■ Hectares of open space in both Districts
13. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	<ul style="list-style-type: none"> ■ Net gain/loss per sqm of development on strategic employment sites ■ Net gain/loss per sqm of employment land across the Districts ■ Net gain/loss per ha of employment land across the Districts ■ Occupied plots on schemes ■ Change of use to Use Class E within and outside of defined Town Centres and net additional Use Class E on greenfield sites ■ Tourism jobs as a percentage of total employment ■ Monetary value of the tourism economy ■ Number of people claiming jobseekers allowance

Chapter 6

How the significant environmental effects of the implementation of the Local Plan will be monitored

Strategic Environmental Assessment of the Babergh and Mid Suffolk

SA Objectives	Proposed Monitoring Indicators
14. To revitalise the District's town centres.	<ul style="list-style-type: none">■ Change of use to Use Class E within and outside of defined Town Centres and net additional Use Class E on greenfield sites■ Use Class E net gains and losses by use within town centres■ Number of shops within town centres■ Number of vacant units in town centres■ Net additional square metres of retail floorspace■ Pedestrian footfall count■ Net dwelling completions per annum within town centres
15. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	<ul style="list-style-type: none">■ Delivery of sustainable and active transport projects as identified in the Infrastructure Delivery Plan, the Ipswich Strategic Planning Area Transport Mitigation Strategy and the Babergh and Mid Suffolk Local Cycling and Walking Infrastructure Plan■ Percentage of journeys made by public transport or active transport■ Car ownership■ Public transport punctuality and efficiency

LUC
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