

Addendum to the Sustainability Appraisal
Final Report and Habitats Regulations
Assessment (including review of Main
Modifications to Core Strategy)

Babergh Development Framework
Strategic Policies (Core Strategy) Submission Draft

June 2012

1. Purpose of document

In accordance with the Planning and Compulsory Purchase Act 2004 Regulations and the requirements of the Strategic Environmental Assessment (SEA) arising from the SEA Directive, the Submission Draft Core Strategy was supported by a Sustainability Appraisal and Habitats Regulations Assessment (HRA) (September 2011). A number of main modifications to the Babergh Core Strategy are proposed in response to the public consultation on the Submission Draft Core Strategy in the autumn 2011 and the publication of the final National Planning Policy Framework (NPPF) in March 2012. This document reviews the Sustainability Appraisal and HRA in light of the proposed changes to the Core Strategy. It must be read in conjunction with the Sustainability Appraisal Main Report, Appendices and HRA Report September 2011.

The document is structured as follows:

- i) initially the document scopes whether there is likely to be a deviation from the published Sustainability Appraisal in light of the proposed key changes;
- ii) potential impacts are reviewed and a summary of the reviews provided. Full SA assessment results can be found in the Appendix to this report (June 2012). The document also summarises a review of the HRA in respect of the proposed changes; and
- iii) Finally the alternatives considered during the preparation of the Core Strategy and reasons for selection of preferred alternatives, including for the key focused changes, are set out in Section 4. Although these aspects were presented at the various stages of the Core Strategy preparation process, it is summarised in this document and the focused changes included, for ease of reference.

A number of minor non-substantive changes are also proposed which are consequential, improve wording or make grammatical corrections. These are not included in this review.

2. Proposed Changes to the (Submission Draft) Core Strategy and Policies Document

There are a number of main modifications proposed to the Core Strategy listed below. These are listed as issues but due to their nature they generate a number of consequential changes in a number of places in the Core Strategy. The key focused changes are summarised below together with an indication of the need for a review of the sustainability appraisal.

Table 1: Summary of proposed changes and need for a sustainability appraisal

Summary of Proposed Change by issue / policy	Potential need for review of SA Yes / No	Comment / Reason for need for review of the SA
<p><i>Main Mod. 1</i> <u>New Policy CS0</u> Additional policy on applying the presumption in favour of sustainable development in Babergh to reflect the NPPF.</p>	Yes	The proposed policy is a new policy and therefore needs to be subject to a sustainability appraisal.
<p><i>Main Mod 3</i> <u>Amendments to Policy CS1</u> Amend policy CS1 to reflect the fact Brantham is provided for in the Core Strategy by a new policy and to make minor amendments to improve clarity.</p>	No	The modification relocates text from one part of the policy to another, and adds Brantham to the list of hinterland villages to provide the planning context for consideration of issues outside of the Brantham regeneration opportunities. The proposed changes to the policy do not introduce new issues not previously included in the Core Strategy.
<p><i>Main Mods 2, 4 and 5.</i> <u>Amendments to para 2.4, Policy CS2 and 2.7.1</u> to ensure compliance with the NPPF and provide greater clarity regarding delivery of housing proposed in the policy.</p>	No	The proposed changes to the policy do not introduce new issues not previously included in the Core Strategy. The overall housing target has not changed (other than to update figures to reflect the previous 12 months completions), but this target and the trajectory is now set out in Policy CS2, rather than in the supporting text. Additional guidance about implementation and delivery is added to the policy. The previous Sustainability Appraisal assessed the policy in the context of the housing targets referred to. The proposed changes therefore have no implications on the Sustainability Appraisal.

Summary of Proposed Change by issue / policy	Potential need for review of SA Yes / No	Comment / Reason for need for review of the SA
<p><i>Main Mods 6, 7 and 8.</i> <u>Amend Policy CS3 as follows:</u> Amend Policy CS3 to include Local Plan Policy CP01 (Chilton Mixed Use) and including information about delivery and implementation of the allocation. Mods also include amendments to the preceding text para 2.8.1 and proposals map A.</p>	Yes	The proposed change reallocates the Local Plan CP01 allocation (Chilton mixed use area) in the Core Strategy as part of Policy CS3 and defines the boundary (including the extension to the existing allocation) for this strategic allocation. The Policy provides greater certainty in respect of delivery and sets out more clearly the requirements and parameters required for the delivery of this mixed use development. The allocated site is shown on Map A and proposed as a focused change. This incorporates the reallocation and the proposed extension to the west.
		Although the fundamental intention set out in the Submission Draft Core Strategy remains unchanged, the reallocation of CP01 and additional wording to update the policy accordingly may have implications for the sustainability appraisal and as a former Adopted Local Plan Policy, CP01 will not previously have been subject to the SEA.
<p><i>Main Mod 9</i> <u>New Policy CS3a as follows:</u> Part of policy CS3 that related to Sudbury East Broad Direction of Growth is now Policy CS3a. Additional text included in policy regarding the delivery and implementation of the policy.</p>	Yes	In light of the recent publication of the NPPF and representations, it is necessary to provide further guidance relating to implementation and delivery of this broad location. In particular development within this broad direction of growth is proposed to come forward later in the plan period and its release is linked to monitoring and review of the progress on the delivery of the Chilton Woods development. As this change introduces new content to the Policy it may have implications on the sustainability appraisal.
<p><i>Mods 10, 11 and 12</i> <u>Amend Policy CS4 – Hadleigh Strategic Allocation</u> – add text to give guidance in terms of delivery and implementation. Amend map to define the boundary to show strategic allocation. Mods also include amendments to the preceding text para 2.8.2 and proposals map B.</p>	Yes	The Core Strategy indicates that one of the strategic growth areas is proposed through additional growth at the east of Hadleigh. The key diagram illustrates a new direction of growth as an arrow to indicate the approximate direction of further growth in this area. This was based on Broad Location 1 previously consulted on and subject to a sustainability appraisal. The proposed change defines the boundary for this allocation and the policy is amended to clearly set out the requirements associated with the delivery of this site. As this change introduces new content to the Policy it may have implications on the sustainability appraisal.

Summary of Proposed Change by issue / policy	Potential need for review of SA Yes / No	Comment / Reason for need for review of the SA
<p><i>Main Mods 13,14 and 15</i> <u>Amend Policy CS5 – Ipswich Strategic Allocation</u> – add text to give guidance in terms of delivery and implementation. Map C to define the boundary to show strategic allocation. Also include preceding paragraph 2.8.3</p>	Yes	The Submission Draft Core Strategy indicates that one of the strategic growth areas is proposed through additional growth at the west of the Ipswich Fringe. The key diagram illustrates a new direction of growth as an arrow to indicate the approximate direction of further growth in this area. This was based on Broad Location 8 previously consulted on and subject to a sustainability appraisal. The proposed change defines the boundary for this allocation and the policy is amended to set out more clarity the requirements associated with the delivery of this site. As this change introduces new content to the Policy it may have implications on the sustainability appraisal.
<p><i>Main Mod 16</i> <u>New Paragraph after Policy CS5</u> <u>Explanatory text about</u> recognition of the regeneration potential of the former sugar beet factory at Sproughton and the contribution of this to the district's economic development</p>	No	The Sustainability Appraisal assessed the Submission Draft Core Strategy policies and objectives. The proposed change does not amend any of the objectives or the policy wording, as it provides clarification regarding the role and relationship to areas which are the subject of planning policy, for example the Ipswich Fringe. Therefore there are no implications of the proposed change on the Sustainability Appraisal.
<p><i>Main Mods 17 and 18</i> <u>CS5a New policy- Sugar beet site: re-allocate in line with saved LP Policy EM04 and proposals Map D</u></p>	Yes	In light of the recent publication of the NPPF it is necessary to reallocate the Adopted Local Plan Policy EM04 in the Core Strategy. Its retention, along with other Local Plan employment sites was considered as part of the Issues and Options SA (2009) and the fundamental intention set out in the Submission Draft Core Strategy remains unchanged. Despite this, Policy CS5a in its current form may have implications for the sustainability appraisal.
<p><i>Main Mods 19, 20 and 21</i> <u>CS5b new policy / Wherstead Park: re-allocate in line with saved LP Policy EM05 and proposals map E.</u></p>	Yes	In light of the recent publication of the NPPF it is necessary to reallocate the Adopted Local Plan Policy EM05 in the Core Strategy. Its retention, along with other Local Plan employment sites was considered as part of the Issues and Options SA (2009) and the fundamental intention set out in the Submission Draft Core Strategy remains unchanged. Despite this, Policy CS5b in its current form may have implications for the sustainability appraisal.

Summary of Proposed Change by issue / policy	Potential need for review of SA Yes / No	Comment / Reason for need for review of the SA
<p><i>Main Mods 22 and 23</i> <u>New Policy 6a for Brantham</u> –brief policy reallocating site and include guidance about implementation and delivery. The policy also indicates that Brantham doesn't form part of Housing figures in CS2. Mods also include proposals map F</p>	Yes	Representations sought greater clarity and guidance in respect of regeneration at Brantham, which is provided by the proposed change. In addition, in light of the recent publication of the NPPF it is necessary to reallocate the Adopted Local Plan Policy EM06 in the Core Strategy. Its retention, along with other Local Plan employment sites was considered as part of the Issues and Options SA (2009) and the fundamental intention set out in the Submission Draft Core Strategy remains unchanged. Despite this, Policy CS6a in its current form may have implications for the sustainability appraisal.
<p><i>Main Mod 24</i> <u>Amendments to Policy CS6-</u> deletion of reference to Brantham regeneration area as dealt with in separate new policy CS6a</p>	No	The proposed change is consequential on the introduction of a separate new policy for Brantham regeneration area (CS6a). This amendment is minor and will not have any implications on the Sustainability Appraisal as
<p><i>Main Mod 25</i> <u>Amend policy CS8-</u> add content about developments that should maximise their contribution to climate change.</p>	No	The Submission Draft SA assessed the Policy CS8, the proposed amendments to the policy wording, do not change the intention of the policy, but clarify the wording and provide more clarity. The additional sentence at the start of the policy indicates the need for all development to maximise its contribution to climate change through mitigation where possible, which was the underlying principle of the policy as previously drafted. This amendment makes the intentions clearer. It does not significantly change the content of the policy and therefore has no significant impact on the Sustainability Appraisal. No review is therefore required.

Summary of Proposed Change by issue / policy	Potential need for review of SA Yes / No	Comment / Reason for need for review of the SA
<p><i>Main Mod 26</i> <u>Various amendments to Policy CS10</u> Additional reference to cover health and well being objectives relating to water management, flood risk, protection of the built heritage and protected sites.</p>	No	<p>The proposed changes do not introduce any new principles or objectives; they clarify existing principles in the policy. The increased emphasis of health and well being in the supporting text and minor amendment to the criteria in Policy CS10, do not change the intentions of the policy. Although there was no direct reference to opportunities for exercise in the original policy wording, the change enhances the interpretation of the policy and offers greater emphasis on sustainable development. The SA for Policy CS10 in particular Objective 1: To improve the health of the population overall, is clearly significantly positive as illustrated in Table 11.2 of the Final Sustainability Report (Sept 2011), so any enhanced emphasis will be consistent with this. Although there was no direct reference to water quality in the original policy wording, the change enhances the interpretation of the policy and offers greater emphasis on sustainable development. The SA for Policy CS10 in particular Objective 1: To improve the health of the population overall; Objective 9: To maintain and where possible improve water quality and Objective 16: To reduce vulnerability to climatic events, are clearly significantly positive as illustrated above, so any enhanced emphasis will be consistent with this. It is considered that the impact on Objective 18: To conserve and where appropriate enhance areas of historical and archaeological importance, will stay the same. There is no need for review of the sustainability appraisal in respect of these proposed changes. A summary of the original assessment is illustrated in Table 11.2 of the Final Sustainability Report (Sept 2011).</p>
<p><i>Main Mod CS 27</i> <u>Policy CS11</u> - amendments to include details relating to implementation and delivery and other minor amendments to policy wording to add clarity.</p>	No	<p>The SA of the Submission Draft CS assessed content of policy CS11 although, it did not specify a quantity of floor space required, or the implementation and delivery requirement. These have been added to ensure compliance with the NPPF. The underlying principle is not amended, the wording change adds more information to the policy and any additional allocations for town centre floorspace if required will need to be addressed through allocations in future DPDs, it is therefore considered that a review of sustainability appraisal at this stage, is not considered appropriate as the change is not likely to have any implications. Other wording amendments also improve the clarity of the policy which do not require reassessment of the SA.</p>

Summary of Proposed Change by issue / policy	Potential need for review of SA Yes / No	Comment / Reason for need for review of the SA
<p><i>Main Mods 28 and 29</i> <u>Employment Policies / Strategy</u> Amended to show whether we will make subsequent allocations and it relates to evidence more closely (ELR etc.) <u>Delete Policy CS12</u> but retention of the content as supporting text</p>	No	<p>The proposed change to supporting text not the policy provides more detail regarding the economic strategy and the evidence that supports it. The policies or objectives in the plan remain unaffected by this change, and do not have any implications on the Sustainability Appraisal. Upon reflection and in light of the publication of the NPPF and associated advice, it is considered that the content of Policy CS12 is more appropriate as supporting text rather than a policy. Other policies provide adequate guidance for the delivery of the economic strategy. These changes do not have any implications on the Sustainability Appraisal.</p>
<p><i>Main Mod 30</i> <u>Amend Policy CS14</u> - as reflected in latest SHMA (& SHLAA) Also amend policy CS14 Gypsies & Travellers – to reflect Planning Policy for traveler sites and make Babergh's position regarding the issue clearer. <u>Amendments to Policy CS 14</u> to reflect this as a specific need in Babergh</p>	Yes	<p>The proposed changes provide more guidance in the policy to clarify the position in respect of Gypsies and Travellers. It also is amended to refer to more up to date evidence from the latest SHMA. The proposed amendments to the policy (and supporting text), provides more detailed information about the needs of the elderly in the district. The document reference to this issue and therefore this is not introduced as a new issue but rather it is given greater emphasis. Although there is no change to the intention or principle of the policy, the wording changes need to be checked against the sustainability appraisal and for completeness, the amended policy is reappraised below.</p>
<p><i>Main Mods 31 and 32</i> <u>Amend Policy CS15</u> – delete housing numbers referred to in policy. Various amendments to the Affordable Housing Policy to reflect the latest SHMA and evidence relating to viability. Also amendments to supporting text para 3.5.4</p>	Yes	<p>The proposed changes provide greater clarity with regard to viability and reference to “minimum” preceding the 35% target for provision is deleted. Also wording amendments to remove reference to the council's specific target for affordable housing provision and instead refer to targets being set for specific areas or allocations, as appropriate, are proposed. Although there is no change to the intention or principle of the policy, the wording changes need to be checked against the sustainability appraisal and for completeness, the amended policy is reappraised below.</p>

3. Review of the Sustainability Appraisal and Habitats Regulations Assessment

- 3.1. Table 1 identified the proposed changes which require some review of the Sustainability Appraisal assessments. For each of these changes a full assessment has been carried out (to view the full assessments please refer to the Appendix to this report). A summary of the results are shown in the tables below and this is also shown with the comparative scores where appropriate from the earlier assessment (as shown in the September 2011 final SA report).

Key for the Summary Tables 3.1- 3.10



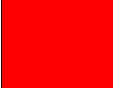

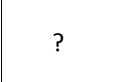
	In conformity with the criterion
	Partially meets the criterion / possibly in conflict with the criterion / some constraints identified
	In conflict with the criterion
	Not relevant to criterion / Neutral effects
	Insufficient information is available

Table 3.1

Proposed Amended Policy CS3 Allocation of the strategic growth area at Chilton, north of Sudbury, including the reallocation of the Adopted Local Plan (2006) policy CP01 and proposed extended boundary			
SA Obj. No.	SA Objectives	SA score (Sept 2011)	Review SA Score (June 2012)
1	To improve the health of the population overall		
2	To maintain and improve levels of education and skills in the population overall		
3	To reduce crime and anti-social activity		
4	To reduce poverty and social exclusion		
5	To improve access to key services for all sectors of the population		
6	To offer everybody the opportunity for rewarding and satisfying employment		
7	To meet the housing requirements of the whole community		
8	To improve the quality of where people live and to encourage community participation		
9	To maintain and where possible improve water quality		
10	To maintain and where possible improve air quality		
11	To conserve soil resources and quality	One sub objective n/a	One sub obj. partially meets criteria
12	To use water & mineral resources efficiently, and re-use and recycle where possible		
13	To reduce waste		
14	To reduce the effects of traffic on the environment		
15	To reduce emissions of greenhouse gases from energy consumption		
16	To reduce vulnerability to climatic events		
17	To conserve and enhance biodiversity and geodiversity		Two sub obj. meets criteria
18	To conserve & where appropriate enhance areas of historical & archaeological importance	Two sub obj. meet criteria	One sub obj. meets criteria
19	To conserve & enhance the quality & local distinctiveness of landscapes & townscapes		

20	To achieve sustainable levels of prosperity & economic growth throughout the plan area		
21	To revitalise town centres		
22	To encourage efficient patterns of movement in support of economic growth		
23	To encourage and accommodate both indigenous and inward investment		

Summary

The Sustainability Appraisal of the broad location in September 2011 was based on the assumption that the existing Local Plan allocation CP01 would be retained. It therefore assessed the broad location as a potential extension of the land allocated under CP01. The June 2012 SA, is based on reallocating the Local Plan site, plus the preferred extended boundary to the west. Most of the assessment scores are the same, with variations evident for site specific constraints. The overall assessment for the site is generally positive, with a few neutral or mixed effects. The significantly negative effect is due to the site being a green field site. However, for growth on this scale there are no more sustainable options such as brown field sites.

The Core Strategy reallocates the Chilton Woods site (CP01 in the Adopted Local Plan) for a mixed use development. In considering options the other broad locations assessed as part of the Core Strategy preparation debated alternatives. Four of the broad locations previously assessed for growth were around Sudbury/ Great Cornard. No other broad locations for growth around Sudbury/ Great Cornard were considered available. The assessments indicated that the broad location to the north of Sudbury (Broad Location 5) performed best in sustainability terms compared with other locations in Sudbury, with the fewest environmental constraints. This broad location to the north of Sudbury was included as a New Direction for Growth in the Draft Core Strategy and was based on an extension to the adopted local plan allocation at Chilton Woods. If the Chilton Woods site were not reallocated the alternatives to accommodate the level of growth which it will provide for, would be the same broad locations considered, which are more constrained. Furthermore, the more advanced position with developers currently undertaking pre-application consultation contributes to greater confidence in respect of delivery within the early part of the plan period.

Background informing the proposed change and alternative options considered.

The Submission Draft Core Strategy based the proposed new direction of growth for the north of Sudbury on the retention of the CP01 boundary. Based on this starting point it was necessary to consider further the options for this growth area accommodating further development within the Core Strategy period up to 2031. In this respect a number of responses to the submission Draft Consultation expressed concern about the lack of clarity and certainty regarding early delivery of development and housing land supply as a result of the direction of growth identified in the Draft Core Strategy, rather than defining a proposed boundary. As this site is intended to come forward during the earlier part of the plan period, it is accepted that there are a number of advantages in proposing a boundary for this site as a focused change to the Core Strategy. These advantages include that it will provide sufficient land availability and flexibility to ensure the best possible form of development, which will be planned efficiently through the masterplan process. In reaching the recommended extended boundary definition consideration was given to the following criteria and assessed against potential alternatives;

- Land Availability
- Capacity/ ability to accommodate required level and character of development
- Landscape / environmental constraints
- Biodiversity/ geodiversity/ archaeological constraints
- Agricultural land classification
- Flood risk
- Accessibility
- Coalescence with other adjoining settlements

Alternative options for accommodating an additional 350 dwellings beyond that committed in the Adopted Local Plan in CP01 at Chilton (now proposed as a reallocation CS3, proposals Map A) were considered against this criteria. A pre-consultation workshop with Town and Parish Councils, Ward Members and landowner / agents representatives was held during March 2012 to discuss these issues. The options identified are listed below;

Option 1 - Accommodate the additional 350 dwellings within the boundary defined for CP01 through intensification within the allocated area (No extension of the boundary).

This would not lead to any further land take, so in respect of many of the criteria scores positively, as there are no additional site specific issues not addressed by the original allocation. However, there is a concern that intensifying development without any additional site area increase may compromise the quality of the development and layout which may be able to be delivered on the site. In the pre-consultation exercise with the Town and Parish Councils it was indicated that there are aspirations for the whole site, (including accommodating an additional 350 dwellings in the next plan period), to be developed at a high quality and at a density and layout which allows for good provision of Green Infrastructure, recreational provision and other infrastructure requirements. Concern was expressed that this may be undermined if additional development were accommodated without any boundary extension.

Option 2 - Accommodate additional growth through an extension of the boundary to the North across whole / part of the site.

In terms of capacity this would allow for sufficient land to ensure a high quality development could be delivered. Land availability is uncertain and unproven. There are landscape constraints associated with extending further north, as the land rises away from Sudbury to the north. A further constraint is the potential for coalescence issues particularly with Great Waldingfield, Acton and Newmans Green. It is important that this is resisted and that there is a clear distinction between the Chilton development and the adjoining settlements.

Option 3 - Accommodate additional growth through extending the boundary to the west

The land is available for development as indicated in 2011 SHLAA. Extending the boundary to the west allows for an access to be located in this area of the site and to allow for sufficient capacity for the site to accommodate the additional 350 dwellings and be developed efficiently and to a high quality allowing for the layout and design to incorporate a good level of green infrastructure, recreational provision and other infrastructure requirements. There are no landscape or environmental constraints and the topography does not raise concerns as the land falls towards Long Melford. The coalescence issue is less evident in this area, as although it takes land within the Long Melford Parish boundary, it is remote from the built up area of the settlement of Long Melford, and extends an area of land already allocated for development to align with field boundaries / features.

Option 4 - Accommodate the additional growth by an extension of the CP01 boundary to the West and in part to the north

This effectively combines options 2 and 3, the comments above for which are relevant. There is no proven justification for requiring an extension, both to the north and the west in order to accommodate the additional growth.

Summary of Sustainability Appraisal for the options identified.

The Sustainability Appraisal objectives cover broad principles which illustrate variations between locations when different locations are assessed but due to the broad nature of most of the SA objectives, only a very small number of them have the potential to demonstrate a variation when site specific areas are assessed within the same general area / direction of growth. The definition of a boundary to illustrate how the additional 350 dwellings may be accommodated within the New Direction of Growth, as proposed by the focused change to the Core Strategy, will not significantly impact on the Sustainability Appraisal of Policy CS3 as indicated in the assessment below. Three SA objectives may result in assessment variations in site specific terms and these are objectives 17, 18 and 19.

In terms of the Sustainability Appraisal for these alternatives, this has also been carried out, just for the 3 objectives to potentially demonstrate site specific variations from the Sustainability Assessment applied to Policy CS3 in the Submission Draft Core Strategy. This is set out below;

Table 3.1a

SA Obj. No.	Sustainability Appraisal Objective	Indicator	Score Option 1	Score Option 2	Score Option 3
17	To conserve and enhance biodiversity and geodiversity	Is the broad location in proximity to a Special Protection Area (SPA), Special Area of Conservation (SAC) or broad location of Special Scientific Interest (SSSI)? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 2-4 km of a SPA, SAC or SSSI. Differentiation is made between European & National Designations given a different level of protection granted to these sites.			
		Is the broad location in proximity to a CWS, LNR or Ancient Woodland? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 500m of a site.			
		Are BAP habitats known to be represented within the broad location?			
		Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS (Regionally Important Geological/Geomorphological Sites)? The broad location within 500m of a SSSI will be coded red and within 1km will be coded amber. The broad location adjacent to RIGS will be coded red and within 500m - amber.			
18	To conserve and where appropriate enhance areas of historical and archaeological importance	Are there any listed buildings within or adjacent to the broad location?			
		Is the broad location in or adjacent to a Conservation Area? Note: The broad locations located in a Conservation Area were coded red, those within 40 metres of a town Conservation Area or within 800m of a village Conservation Area (a PPG2 criteria) were coded orange and broad locations not in proximity to any Conservation Areas were coded green.			

		Is the broad location in or adjacent to a Historic Park and Garden? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a Historic Park and Garden.			
		Does the broad location contain or it is adjacent to a Scheduled Ancient Monument (SAM)? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a SAM.			
		Does the broad location fall within or it is adjacent to an Area of Archaeological Importance or a potential archaeological site? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of an Area of Archaeological Importance or a potential archaeological site.			
19	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Do parts of the broad location cover or they are adjacent to a Green Corridor? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a Green Corridor.			
		Is the broad location in or adjacent to areas of designated landscapes (AONB, Environmentally Sensitive Areas)?			
		Will the broad location development lead to coalescence of urban extensions with nearby villages?			

Summary of assessments and findings

In terms of the Sustainability Appraisal of the 3 objectives listed, option 1 performed well as it does not require any further land take, however option 3 is preferable, as not only does the SA not indicate any negative impacts in respect of these objectives, it is also preferable when assessed against the other criteria considered listed above. Whereas Option 1 does not perform well against all of the other criteria particularly the ability of the site to be developed at the increased capacity and ensure the high quality of design layout and appropriate character is achieved. Option 2, performed worst in sustainability terms and also illustrates a number of constraints when assessed against the other criteria, particularly in respect of coalescence. For these reasons Option 3 is the preferred option, and is proposed as a focused change in the Core Strategy.

Table 3.2

Proposed amended policy CS3a for the new Broad Direction of Growth at Sudbury East			
SA Obj. No.	SA Objectives	SA score (Sept 2011) (based on Broad Location 6)	Review SA Score (June 2012)
1	To improve the health of the population overall	Two sub obj. in conformity with criteria	Two sub obj. in conformity with criteria
2	To maintain and improve levels of education and skills in the population overall	One sub obj. in conformity with criteria	One sub obj. in conformity with criteria
3	To reduce crime and anti-social activity		
4	To reduce poverty and social exclusion		
5	To improve access to key services for all sectors of the population	Three sub obj. in conformity with criteria	Three sub obj. in conformity with criteria
6	To offer everybody the opportunity for rewarding and satisfying employment		
7	To meet the housing requirements of the whole community		
8	To improve the quality of where people live and to encourage community participation		
9	To maintain and where possible improve water quality		
10	To maintain and where possible improve air quality		
11	To conserve soil resources and quality	One sub obj. in conformity with criteria	One sub obj. in conformity with criteria
12	To use water & mineral resources efficiently, and re-use and recycle where possible		
13	To reduce waste		
14	To reduce the effects of traffic on the environment		
15	To reduce emissions of greenhouse gases from energy consumption		
16	To reduce vulnerability to climatic events		
17	To conserve and enhance biodiversity and geodiversity	Three sub obj. in conformity with criteria	Three sub obj. in conformity with criteria

18	To conserve & where appropriate enhance areas of historical & archaeological importance	Three sub obj. in conformity with criteria	Three sub obj. in conformity with criteria
19	To conserve & enhance the quality & local distinctiveness of landscapes & townscapes	Two sub obj. in conformity with criteria	Two sub obj. in conformity with criteria
20	To achieve sustainable levels of prosperity & economic growth throughout the plan area		
21	To revitalise town centres		
22	To encourage efficient patterns of movement in support of economic growth		
23	To encourage and accommodate both indigenous and inward investment		

Summary

The proposed change retains the policy objective of indicating land to the east of Sudbury and Great Cornard for a broad direction for growth for employment uses and approximately 500 new homes and land for employment uses. Due to the proposed timing of development in this location coming forward towards the end of the plan period, the site is not allocated with defined boundaries at this stage. The amended policy continues to refer to the broad location for growth, and gives some further guidance in respect of likely timing and the process for the more detailed stages of plan preparation in respect of developing clearer guidance for this site to be delivered later in the plan period. The proposed policy wording provides some broad parameters / considerations likely to be relevant to developing further guidance in a future DPD. This policy has been assessed for the sustainability appraisal; however, the scores do not vary from the original broad location assessment, as no further information of site definition etc is yet known. Therefore there are no implications of the proposed policy change on the sustainability appraisal

Table 3.3

Proposed Amended Policy CS4 Strategic Growth area Allocation at Hadleigh			
SA Obj. No	Sustainability Appraisal Objectives	SA score (Sept 2011)	Review of SA Score (June 2012)
1	To improve the health of the population overall		
2	To maintain and improve levels of education and skills in the population overall		
3	To reduce crime and anti-social activity		
4	To reduce poverty and social exclusion		
5	To improve access to key services for all sectors of the population	Three sub obj. in conformity with criteria	Three sub obj. in conformity with criteria
6	To offer everybody the opportunity for rewarding and satisfying employment		
7	To meet the housing requirements of the whole community		
8	To improve the quality of where people live and to encourage community participation		
9	To maintain and where possible improve water quality		
10	To maintain and where possible improve air quality		
11	To conserve soil resources and quality	One sub objectives n/a	One sub objectives n/a
12	To use water & mineral resources efficiently, and re-use and recycle where possible		
13	To reduce waste		
14	To reduce the effects of traffic on the environment		
15	To reduce emissions of greenhouse gases from energy consumption		
16	To reduce vulnerability to climatic events		
17	To conserve and enhance biodiversity and geodiversity	Two sub obj. in conformity and one in partial conformity	Three sub objectives in conformity with criteria
18	To conserve & where appropriate enhance areas of historical & archaeological importance	Four obj. in conformity with criteria	Four sub obj. in conformity with criteria

19	To conserve & enhance the quality & local distinctiveness of landscapes & townscapes		
20	To achieve sustainable levels of prosperity & economic growth throughout the plan area		
21	To revitalise town centres		
22	To encourage efficient patterns of movement in support of economic growth		
23	To encourage and accommodate both indigenous and inward investment		

Summary

The broad location abuts Hadleigh settlement boundary. Development of sites within it would lead to the loss of greenfield agricultural land. On the positive side this broad location benefits from the services and facilities offered within Hadleigh and it has the advantage of being located in close proximity to public transport routes and Public Rights of Way. The broad location is not at flood risk. Proposed mixed use development should help minimise the need for travel. The broad location has been identified to be situated in proximity to the SSSI and LNR. It is also adjacent to an Area of Archaeological Importance and a Special Landscape Area and it is situated in a relative proximity to a village Conservation Area. These identified constraints do not represent 'show stoppers' for the broad location's development and will be carefully considered through the master planning process. The boundary definition reflects the development requirements and the landscape and topography. Sufficient land is included to ensure the design layout can adequately address landscape constraints and provide good connections and green infrastructure links.

The Submission draft Core Strategy indicates that one of the strategic growth areas is proposed through additional growth at the east of Hadleigh. The key diagram illustrates a new direction of growth as an arrow to indicate the approximate direction of further growth in this area. This was based on Broad Location 1 previously consulted on and subject to a sustainability appraisal.

A number of responses expressed concern about the lack of clarity and certainty about delivery, provided by simply identifying the direction of growth, rather than defining a proposed boundary. As this site is intended to come forward during the earlier part of the plan period, it is accepted that there are a number of advantages in proposing a boundary for this site as a focused change to the Core Strategy, to enable earlier delivery of development and demonstrate greater certainty in respect of this development and its contribution to land supply. The proposed change defines the boundary for the new direction growth shown on Map B and proposed as a focused change

Background informing the proposed change and consideration of alternatives

The proposed change is recommended in response to representations related to concerns about early delivery, certainty and housing land supply. It is understood that these concerns may be addressed by defining a boundary at this stage through a focused change. In reaching the recommended boundary definition consideration was given to the following criteria and assessed;

- Land Availability
- Capacity/ ability to accommodate required level and character of development
- Landscape / environmental constraints
- Biodiversity/ geodiversity / archaeological constraints
- Agricultural land classification
- Flood risk
- Accessibility
- Coalescence with other adjoining settlements

A pre-consultation workshop with Hadleigh Town Councillors, Ward members, and landowner/agents representatives was held to consider options for accommodating an additional 250 dwellings on land to the east of Hadleigh (Broad Location 1). The 2006 Local Plan allocations (for residential and employment development with new roundabout and access off the A1071) were considered, and the only option to emerge for this area was to design the New Direction of Growth to be a logical extension to this development (which is under way) as close as possible to the built up area of the town and town centre services and facilities. No further assessment of alternatives is therefore appropriate.

Table 3.4

Proposed Amended Policy CS5 Strategic Growth area Allocation at Ipswich Fringe			
SA Obj. No	Sustainability Appraisal Objectives	SA score (Sept 2011)	Review of SA Score (June 2012)
1	To improve the health of the population overall	Two sub obj. in conformity with criteria	
2	To maintain and improve levels of education and skills in the population overall		One sub obj. in conformity with criteria
3	To reduce crime and anti-social activity		
4	To reduce poverty and social exclusion		
5	To improve access to key services for all sectors of the population	Three sub obj. in conformity with criteria	Three sub obj. in conformity with criteria
6	To offer everybody the opportunity for rewarding and satisfying employment		
7	To meet the housing requirements of the whole community		
8	To improve the quality of where people live and to encourage community participation		
9	To maintain and where possible improve water quality		
10	To maintain and where possible improve air quality		
11	To conserve soil resources and quality	One sub obj. in conformity with criteria	
12	To use water & mineral resources efficiently, and re-use and recycle where possible		
13	To reduce waste		
14	To reduce the effects of traffic on the environment		
15	To reduce emissions of greenhouse gases from energy consumption		
16	To reduce vulnerability to climatic events		
17	To conserve and enhance biodiversity and geodiversity	Three sub obj. in conformity with criteria	Three sub obj. in conformity with criteria

18	To conserve & where appropriate enhance areas of historical & archaeological importance	Two sub obj. in conformity with criteria	Two sub obj. in conformity with criteria
19	To conserve & enhance the quality & local distinctiveness of landscapes & townscapes	Two sub obj. in conformity with criteria	Two sub obj. in conformity with criteria
20	To achieve sustainable levels of prosperity & economic growth throughout the plan area		
21	To revitalise town centres		
22	To encourage efficient patterns of movement in support of economic growth		
23	To encourage and accommodate both indigenous and inward investment		

Summary

The SA Assessment identifies a few negative impacts, some neutral impacts and a number of overall positive effects. The proximity of the SPA has implications which have been assessed through the HRA, the implications of which will be reflected in the implementation and delivery. Development of the site will need to be designed and managed to reflect the HRA and also to ensure that adequate safe access to services, particularly to primary schools, is provided. Various options exist to achieve this, which are reflected in policy CS5.

The Submission draft Core Strategy indicates that one of the strategic growth areas is proposed through additional growth at land to the west of the Ipswich Fringe. The key diagram illustrates a new direction of growth as an arrow to indicate the approximate direction of further growth in this area. This proposal followed an earlier consultation exercise in which nine alternative broad directions of growth throughout the district were consulted on and the subject of a Sustainability Appraisal. Two of these areas considered were in the Ipswich Fringe.

A number of responses expressed concern about the lack of clarity and certainty about delivery, provided by simply identifying the direction of growth, rather than defining a proposed boundary. As this site is intended to come forward during the earlier part of the plan period, it is accepted that there are a number of advantages in proposing a boundary for this site as a focused change to the Core Strategy, to enable earlier delivery of development and demonstrate greater certainty in respect of this development and its contribution to land supply. The proposed change defines the boundary for the new direction growth to allocate land to the west of the Ipswich Fringe. This is shown on Map C and proposed as a focused change.

Background informing the proposed change and consideration of alternatives

The proposed change is recommended in response to representations related to concerns about early delivery, certainty and housing land supply. It is understood that these concerns may be addressed by defining a boundary at this stage through a focused change. In reaching the recommended boundary definition consideration was given to the following criteria and assessed against potential alternatives;

- Land Availability
- Capacity/ ability to accommodate required level and character of development
- Landscape / environmental constraints
- Biodiversity/ geodiversity/ archaeological constraints
- Agricultural land classification
- Flood risk
- Accessibility
- Coalescence with other adjoining settlements

Alternative options for accommodating an additional 350 dwellings and land for employment on land to the west of Ipswich Fringe were considered against this criteria. A pre-consultation workshop with Parish Councils, Ward Members and landowner / agents representatives was held to discuss these issues. The options identified are listed below;

Option 1- Land between A14, A1214 and Hadleigh Road (A1071)

This area of land is well contained and has a number of advantages in the context of the criteria considered for its suitability for development in the future. It is already partly developed, is available and has the potential to provide a new community (up to 350 dwellings and additional employment land), around existing dwellings within walking distance of shops, other facilities / services, bus services and a pedestrian / cycle route; and a quality business 'gateway' site comprising 6 hectares of employment land reflecting the Suffolk One sixth-form college and planned office development on the opposite side of the road. It has no particular environmental or landscape constraints associated with it.

Option 2- Land North of A1071 (Hadleigh Road) - Chantry Vale

This area is significantly larger area and has more complex issues associated with development. Its availability and deliverability is unproven and parts of it are of high landscape quality and the area includes Chantry Park which is a Registered Park and Garden. Whilst there is clearly the potential and the capacity for this undeveloped, largely agricultural land to make a major contribution to the green infrastructure and other needs of the area, especially in providing for recreation and open-space needs, this may only be able to be delivered as part of a comprehensive plan for the whole area that would be likely to include some development of the urban edge. However, the scale and scope of this is larger than Babergh's requirements for this current plan period and an allocation in this area at this stage may be premature and lead to an unacceptable piecemeal approach that would be damaging to a comprehensive plan for its future. For these reasons, the site is not sequentially preferable.

The Sustainability Appraisal objectives cover broad principles which illustrate variations between locations when different locations are assessed, as they were in the SA of the Broad Locations (autumn 2010). This indicated that the Broad location to the west of Ipswich Fringe (Broad Location 8) performed best in of the options in Ipswich Fringe the Sustainability Appraisal with few environmental constraints.

Due to the broad nature of most of the SA objectives, only a very small number of them have the potential to demonstrate any variation when site specific areas are assessed within the same general area / direction of growth. The definition of a boundary to illustrate how the additional 350 dwellings may be accommodated within the New Direction of growth, as proposed by a focused change, will not significantly impact on the Sustainability Appraisal of Policy CS5 in the draft Core Strategy. Three SA objectives may result in assessment variations in site specific terms these are indicated below and the SA is reviewed in respect of these in the light of the proposed change.

In terms of the Sustainability Appraisal for these alternatives, this has also been carried out, just for the 3 objectives to potentially demonstrate site specific variations from the Sustainability Assessment applied to Policy CS5 in the Submission Draft Core Strategy. This is set out below;

Table 3.4a

SA Obj. No.	Sustainability Appraisal Objective	Indicator	Score Option 1	Score Option 2
17	To conserve and enhance biodiversity and geodiversity	Is the broad location in proximity to a Special Protection Area (SPA), Special Area of Conservation (SAC) or broad location of Special Scientific Interest (SSSI)? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 2-4 km of a SPA, SAC or SSSI. Differentiation is made between European & National Designations given a different level of protection granted to these sites.		
		Is the broad location in proximity to a CWS, LNR or Ancient Woodland? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 500m of a site.		
		Are BAP habitats known to be represented within the broad location?		
		Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS (Regionally Important Geological/Geomorphological Sites)? The broad location within 500m of a SSSI will be coded red and within 1km will be coded amber. The broad location adjacent to RIGS will be coded red and within 500m - amber.		
18	To conserve and where appropriate enhance areas of historical and archaeological importance	Are there any listed buildings within or adjacent to the broad location?		
		Is the broad location in or adjacent to a Conservation Area? Note: The broad locations located in a Conservation Area were coded red, those within 40 metres of a town Conservation Area or within 800m of a village Conservation Area (a PPG2 criteria) were coded orange and broad locations not in proximity to any Conservation Areas were coded green.		
		Is the broad location in or adjacent to a Historic Park and Garden? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a Historic Park and Garden.		

		Does the broad location contain or it is adjacent to a Scheduled Ancient Monument (SAM)? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a SAM.		
		Does the broad location fall within or it is adjacent to an Area of Archaeological Importance or a potential archaeological site? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of an Area of Archaeological Importance or a potential archaeological site.		
19	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Do parts of the broad location cover or they are adjacent to a Green Corridor? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a Green Corridor.		
		Is the broad location in or adjacent to areas of designated landscapes (AONB, Environmentally Sensitive Areas)?		
		Will the broad location development lead to coalescence of urban extensions with nearby villages?		

Summary

The sustainability appraisal of the proposed boundary definition in respect of the 3 objectives for the 2 options considered at the Ipswich Fringe indicates that option 1 is the preferred option. The assessment indicated minimal negative impacts alongside positive impacts. Any potential negative impacts will need to be minimised through good design, and a master planning approach to reflect existing site characteristics and any historical or landscape considerations. Equally through the provision of green infrastructure these interests can be positively managed. In the sustainability review of the 3 objectives, option 2 has illustrates a more significant negative impacts in terms of objectives 18 and 19, which is largely due to the proximity to the Registered Park and Garden and a greater number of existing listed buildings. Option 1 is the preferred option in respect of the sustainability appraisal and sequentially preferable when assessed against the other criteria listed above.

Table 3.5

Proposed New Policy CS5a Sproughton Sugar Beet Site (including the reallocation of EM04 (Adopted Local Plan 2006))			
SA Obj. No	Sustainability Appraisal Objectives	SA score (Sept 2011)	Review of SA Score (June 2012)
1	To improve the health of the population overall	N/A	Two sub obj. n/a
2	To maintain and improve levels of education and skills in the population overall	N/A	
3	To reduce crime and anti-social activity	N/A	
4	To reduce poverty and social exclusion	N/A	
5	To improve access to key services for all sectors of the population	N/A	
6	To offer everybody the opportunity for rewarding and satisfying employment	N/A	
7	To meet the housing requirements of the whole community	N/A	
8	To improve the quality of where people live and to encourage community participation	N/A	
9	To maintain and where possible improve water quality	N/A	
10	To maintain and where possible improve air quality	N/A	
11	To conserve soil resources and quality	N/A	One sub obj. in conformity with criteria
12	To use water & mineral resources efficiently, and re-use and recycle where possible	N/A	
13	To reduce waste	N/A	
14	To reduce the effects of traffic on the environment	N/A	
15	To reduce emissions of greenhouse gases from energy consumption	N/A	
16	To reduce vulnerability to climatic events	N/A	
17	To conserve and enhance biodiversity and geodiversity	N/A	Two sub obj. in conformity with criteria
18	To conserve & where appropriate enhance areas of historical & archaeological importance	N/A	Four sub obj. in conformity with criteria

19	To conserve & enhance the quality & local distinctiveness of landscapes & townscapes	N/A	One sub objective n/a
20	To achieve sustainable levels of prosperity & economic growth throughout the plan area	N/A	
21	To revitalise town centres	N/A	
22	To encourage efficient patterns of movement in support of economic growth	N/A	
23	To encourage and accommodate both indigenous and inward investment	N/A	

Summary

The SA assessment has mostly positive effects with a number of neutral effects, as the proposed use is solely for employment. The positive opportunity for this site to contribute to the strategic employment requirements are specific to the site location, as a brownfield site of the former sugar beet factory. The opportunities associated with its location within the A14 corridor are particularly beneficial to employment uses.

In terms of considering alternatives to the allocated site at Sproughton, the only real option is not to reallocate the site, or to “do nothing”. This is not however, considered to be a reasonable alternative as it would not achieve any positive benefits. The opportunities associated with the site are unique and relate only to this location. It is therefore appropriate that the Core Strategy reallocates the site and provides a policy context for the consideration of opportunities to regenerate the area for economic benefit as a strategic employment site during the plan period.

Table 3.6

Proposed New Policy CS5b Wherstead Park (reallocation of EM05 (Adopted Local Plan 2006)			
SA Obj. No	Sustainability Appraisal Objectives	SA score (Sept 2011)	Review of SA Score (June 2012)
1	To improve the health of the population overall	N/A	One sub obj. n/a
2	To maintain and improve levels of education and skills in the population overall	N/A	
3	To reduce crime and anti-social activity	N/A	
4	To reduce poverty and social exclusion	N/A	
5	To improve access to key services for all sectors of the population	N/A	
6	To offer everybody the opportunity for rewarding and satisfying employment	N/A	
7	To meet the housing requirements of the whole community	N/A	
8	To improve the quality of where people live and to encourage community participation	N/A	
9	To maintain and where possible improve water quality	N/A	
10	To maintain and where possible improve air quality	N/A	
11	To conserve soil resources and quality	N/A	One sub objective n/a
12	To use water & mineral resources efficiently, and re-use and recycle where possible	N/A	
13	To reduce waste	N/A	
14	To reduce the effects of traffic on the environment	N/A	
15	To reduce emissions of greenhouse gases from energy consumption	N/A	
16	To reduce vulnerability to climatic events	N/A	
17	To conserve and enhance biodiversity and geodiversity	N/A	Two sub obj. in conformity with criteria
18	To conserve & where appropriate enhance areas of historical & archaeological importance	N/A	Three sub obj. in conformity; one in partial conformity

19	To conserve & enhance the quality & local distinctiveness of landscapes & townscapes	N/A	Two sub obj. in conformity
20	To achieve sustainable levels of prosperity & economic growth throughout the plan area	N/A	
21	To revitalise town centres	N/A	
22	To encourage efficient patterns of movement in support of economic growth	N/A	
23	To encourage and accommodate both indigenous and inward investment	N/A	

Summary

The assessment of this site is mostly a combination of positive effects with a number of neutral effects. This is largely due to it being proposed for employment uses only, which results in a number of the objectives either not being relevant or having no effect. The opportunities associated with the site are unique and relate only to this location and contribute positively to the strategic employment needs of the district.

In terms of considering alternatives to the allocated site at Wherstead, the only real option is not to reallocate the site, or to “do nothing”. This is not however, considered to be a reasonable alternative as it would not achieve any positive benefits. The opportunities associated with the site are unique and relate only to this location. It is therefore appropriate that the Core Strategy reallocates the site and provides a policy context for the consideration of opportunities to regenerate the area for economic benefit as a strategic employment site during the plan period.

Table 3.7

Proposed New Policy CS6a Brantham Regeneration Area (including the reallocation of EM06 (Adopted Local Plan 2006))			
SA Obj. No	Sustainability Appraisal Objectives	SA score (Sept 2011) Based on summary for CS6 Core & Hinterland villages (incl. Brantham)	Review of SA Score (June 2012) Based on site specific SA
1	To improve the health of the population overall	+	
2	To maintain and improve levels of education and skills in the population overall	+	One sub obj. in conformity with criteria
3	To reduce crime and anti-social activity	+	
4	To reduce poverty and social exclusion	+	
5	To improve access to key services for all sectors of the population	++	Three sub obj. in conformity with criteria
6	To offer everybody the opportunity for rewarding and satisfying employment	++	
7	To meet the housing requirements of the whole community	++	
8	To improve the quality of where people live and to encourage community participation	+	
9	To maintain and where possible improve water quality	-	
10	To maintain and where possible improve air quality	-	
11	To conserve soil resources and quality	--	One sub objective n/a
12	To use water & mineral resources efficiently, and re-use and recycle where possible	-	
13	To reduce waste	-	
14	To reduce the effects of traffic on the environment	-	
15	To reduce emissions of greenhouse gases from energy consumption	--	
16	To reduce vulnerability to climatic events	+/-	

17	To conserve and enhance biodiversity and geodiversity	--	Two sub obj. in conformity with criteria
18	To conserve & where appropriate enhance areas of historical & archaeological importance	-	Three sub obj. in conformity with criteria
19	To conserve & enhance the quality & local distinctiveness of landscapes & townscapes	--	One sub obj. in conformity; one sub obj. n/a
20	To achieve sustainable levels of prosperity & economic growth throughout the plan area	++	
21	To revitalise town centres	++	
22	To encourage efficient patterns of movement in support of economic growth	++	
23	To encourage and accommodate both indigenous and inward investment	++	

Summary

The SA assessment shows a number of positive and neutral effects as well as several potentially negative impacts. The site is located in close proximity to environmentally sensitive areas; however, the site is a regeneration proposal to address location specific issues the benefits of which outweigh the potentially negative effects. These will need to be managed and minimised through mitigation which will be ensured at later stages of the planning process. The two SA in 2011 and 2012 are not directly comparable as the 2011 was based on a Policy assessment which did not include a specific allocation. The 2012 assessment however is for an allocation. The overall objectives assessed are the same, but the site specific approach is a little more detailed providing a more specific stance for some of the objectives assessed. This explains some of the variations and also for the presence of +/- symbols in the 2011 assessment. However, it is useful to illustrate the two together.

In terms of considering alternatives to the allocated site at Brantham, the only real option is not to reallocate the site, or to “do nothing”. This is not however, considered to be a reasonable alternative as it would not achieve any positive benefits. The opportunities associated with the site are unique and relate only to this location. It is therefore appropriate that the Core Strategy reallocates the site and provides a policy context for the consideration of opportunities to regenerate the area during the plan period.

Table 3.8

Proposed additional Policy CS0 - Presumption in favour of Sustainable Development			
SA Obj. No.	Sustainability Appraisal Objectives	SA Score (Sept 2011)	Review of SA Score (June 2012)
1	To improve the health of the population overall	Not applicable as this is a new policy proposed to reflect the NPPF N/A	++
2	To maintain and improve levels of education and skills in the population overall	N/A	++
3	To reduce crime and anti-social activity	N/A	++
4	To reduce poverty and social exclusion	N/A	++
5	To improve access to key services for all sectors of the population	N/A	+++
6	To offer everybody the opportunity for rewarding and satisfying employment	N/A	++
7	To meet the housing requirements of the whole community	N/A	++
8	To improve the quality of where people live and to encourage community participation	N/A	++
9	To maintain and where possible improve water quality	N/A	-/+
10	To maintain & where possible improve air quality	N/A	-
11	To conserve soil resources and quality	N/A	-
12	To use water and mineral resources efficiently, and re-use and recycle where possible	N/A	-/+
13	To reduce waste	N/A	-/+
14	To reduce the effects of traffic on the Environment	N/A	+/-
15	To reduce emissions of greenhouse gases from energy consumption	N/A	+/-
16	To reduce vulnerability to climatic events	N/A	+
17	To conserve and enhance biodiversity and Geodiversity	N/A	-/+
18	To conserve and where appropriate enhance areas of historical and archaeological importance	N/A	-/+

19	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	N/A	-/+
20	To achieve sustainable levels of prosperity and economic growth throughout the plan area	N/A	+++
21	To revitalise town centres	N/A	++
22	To encourage efficient patterns of movement in support of economic growth	N/A	+
23	To encourage and accommodate both indigenous and inward investment	N/A	++

Summary

The proposed policy indicates primarily positive impacts when assessed against the sustainability appraisal objectives. In terms of the social objectives the impacts are positive with a need to ensure that development is located close to a range of facilities and that the location minimises the need to travel. Other policies in the Core Strategy or development management policies will ensure that potentially negative impacts are managed or mitigated such as ensuring local needs are catered for and good connections between development and facilities are designed into new developments from the outset. In terms of the environmental objectives, the assessment indicates a balance between positive impacts and potentially negative impacts. Core Strategy and development management policies adequately ensure that environmental impacts are minimised and that sufficient mitigation is established if appropriate. There will also be opportunities to ensure that infrastructure provision, such as green infrastructure and use of measures such as SuDs can make positive mitigation contributions to environmental objectives when development opportunities are appropriate. As the policy is pro development, the economic objectives all demonstrate positive or significantly positive impacts. Overall there are no significant negative impacts so not mitigation measures are proposed.

The proposed inclusion of this policy is to reflect the NPPF, and as such it is a requirement in order to be compliant with national policy. It is based on the guidance set out in the NPPF and reflects to overall current policy context. Given the context of these changes, no alternatives are required to be considered.

Table 3.9

Proposed Amended Policy CS14 Mix and Types of Dwellings			
SA Obj. No.	Sustainability Appraisal Objectives	SA Score (Sept 2011)	Review of SA Score (June 2012)
1	To improve the health of the population overall	++	++
2	To maintain and improve levels of education and skills in the population overall	+	+
3	To reduce crime and anti-social activity	+	+
4	To reduce poverty and social exclusion	++	++
5	To improve access to key services for all sectors of the population	++	++
6	To offer everybody the opportunity for rewarding and satisfying employment	+	+
7	To meet the housing requirements of the whole community	+++	+++
8	To improve the quality of where people live and to encourage community participation	+	+
9	To maintain and where possible improve water quality	-	-/+
10	To maintain and where possible improve air quality	-	-/+
11	To conserve soil resources and quality	-	-/+
12	To use water and mineral resources efficiently, and re-use and recycle where possible	-	-/+
13	To reduce waste	-	-/+
14	To reduce the effects of traffic on the Environment	-	-/+
15	To reduce emissions of greenhouse gases from energy consumption	-	-/+
16	To reduce vulnerability to climatic events	0	0
17	To conserve and enhance biodiversity and Geodiversity	0	-/+
18	To conserve and where appropriate enhance areas of historical and archaeological importance	0	-/+
19	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	0	-/+

20	To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	+
21	To revitalise town centres	++	++
22	To encourage efficient patterns of movement in support of economic growth	+	+
23	To encourage and accommodate both indigenous and inward investment	+	+
Summary The effects of the proposed changes to the policy have no significant impact on the sustainability appraisal. The summary of the scores indicated in the table illustrate this. Overall the positive effects are unchanged. A few of the moderately negative effects in the original SA are scored as neutral or a mixture of positive and negative, as some of the detailed outcomes will be varied and may be unknown. The summary for the original SA grouped together the other policies in the housing component which may account for some variations. The full assessment is in the addendum appendix. The policy itself is about the mix and types of dwellings, so some of the effects will only be indirectly related to this policy, and in many cases may be positive or negative or a mixture of both.			

Table 3.10

Proposed Amended Policy CS15 Affordable Homes			
SA obj. No.	Sustainability Appraisal Objectives	SA score (Sept 2011)	Review of SA Score (June 2012)
1	To improve the health of the population overall	++	++
2	To maintain and improve levels of education and skills in the population overall	+	+
3	To reduce crime and anti-social activity	+	+
4	To reduce poverty and social exclusion	++	++
5	To improve access to key services for all sectors of the population	++	++
6	To offer everybody the opportunity for rewarding and satisfying employment	+	+
7	To meet the housing requirements of the whole community	+++	+++
8	To improve the quality of where people live and to encourage community participation	+	+
9	To maintain and where possible improve water quality	-	-

10	To maintain and where possible improve air quality	-	-
11	To conserve soil resources and quality	-	-
12	To use water and mineral resources efficiently, and re-use and recycle where possible	-	-
13	To reduce waste	-	-
14	To reduce the effects of traffic on the environment	-	-
15	To reduce emissions of greenhouse gases from energy consumption	-	-
16	To reduce vulnerability to climatic events	0	0
17	To conserve and enhance biodiversity and geodiversity	0	0
18	To conserve and where appropriate enhance areas of historical and archaeological importance	0	0
19	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	0	0
20	To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	+
21	To revitalise town centres	++	++
22	To encourage efficient patterns of movement in support of economic growth	+	++
23	To encourage and accommodate both indigenous and inward investment	+	+
Summary <p>The effects of the proposed changes to the policy have no significant impact on the sustainability appraisal. The summary of the scores indicated in the table illustrate this. Overall the positive effects are largely unchanged. The only variation is in the degree of positive impact indicated for objectives 22 the difference is marginal in the full assessment and the long term effects of successful implementation of the amended policy CS15 will be positive in respect of encouraging efficient patterns of movement in support of economic growth as a consequence of affordable housing provision throughout the district, meeting a range of local needs. The overall implications of the changes do not impact on the sustainability appraisal.</p>			

3.2. Summary of review of the Habitats Regulations in respect of the proposed changes to the Submission Draft Core Strategy

The HRA screening was carried out by Atkins Limited on behalf of Babergh District Council, initially with a Preliminary Review (Stage1) of Issues and Options Core Strategy Report (March 2009) and then for the *Babergh Working Draft Core Strategy (May 2011)* and subsequently updated for the Core Strategy Submission Draft (September 2011). A final report was provided in September 2011 which builds on a previous draft report (July 2011) in which recommendations were provided for Babergh District Council to consider and to incorporate into the Core Strategy where required, to mitigate potential issues identified during the HRA screening process. These were considered in consultation with Natural England, prior to finalisation of the Submission Draft Core Strategy and where appropriate were incorporated into the Core Strategy.

The proposed changes to the Core Strategy relate to amendments in response to representations following the consultation on the Submission Draft Core Strategy. These are largely minor / non-substantive in nature and generally improve the clarity of the document, rather than change the intentions or principles of the strategic policies. Proposed changes are also suggested to ensure full compliance with the NPPF, which includes further amendments to policy and the introduction of a new policy on the presumption in favour of sustainable development.

The most substantive changes relate to the need to reallocate sites in the 2006 Adopted Local Plan in order to secure the long term planning commitment to them. In addition strategic allocations are also proposed for 3 of the 4 broad locations as strategic growth areas, again to provide greater security in respect of delivery of those sites required to come forward in the earlier part of the plan period. Although these changes are more substantive, none of them are new issues and all have been the subject of earlier iterations of the core strategy and therefore subject to the HRA process, at least in principle. As such the principle of the site allocations have been subject to consultation, sustainability appraisal, SEA and the HRA. In respect of the HRA it is necessary to consider the extent to which the proposed changes require any further assessment. For the more substantive proposed Modifications which are site specific or incorporate a new policy this is considered further in the table below.

Proposed Modification	Main	Nature of the Change and relevance to /impact on the HRA	HRA consideration/ ref
Mod 1 New Policy CS0		New policy for the presumption in favour of sustainable development is required by the NPPF and the wording is based on the model policy suggested by the Planning Inspectorate. The policy is additional and required for compliance reasons. The Submission Draft Core Strategy (October 2011) and earlier drafts included a policy on sustainable development which incorporates the broad principles set out in the proposed policy. With the emphasis of this policy being a presumption in favour of	New policy although fundamental principles comprise elements of policy CS10 (formerly CS7). HRA found A3 type policy intended to conserve or enhance the natural, built or historic environment, not likely to have a negative impact on a European site. Recommendations set out in the HRA incorporated in the Submission Draft CS

	<p>sustainable development it provides a specific role not fully covered in policy CS10 (formerly numbered as CS7). In terms of the HRA, the policy and the NPPF provide safeguards which exempt areas which under the Birds or Habitats Directive require an Appropriate Assessment from this presumption. (Paragraph 119 of the NPPF). The policy also includes criterion which refers to other material considerations, which would clearly include development which is likely to have a significant impact on European Sites covered by the Birds and Habitats Directive. In effect these safeguards will prevent there being significant effects in respect of the European Sites and therefore no further HRA is necessary at this stage.</p>	<p>and unaltered by the Modifications.</p>
<p>Mod 2 paragraph 2.4 Mod 4 Policy CS2 Strategy for Growth and Development.</p>	<p>The change updates the figures in the level of growth table to reflect the actual number of completions in the previous 12 months. In addition it incorporates a 10% buffer to allow for non / slow delivery, as required by the NPPF. The total level of growth and the provision by new sites is unchanged. The modification to Policy CS2 incorporates the growth levels, the housing trajectory and the buffer allowance into the policy, whereas previously these were in the supporting text. The level of growth is therefore unchanged from the Submission Draft Core Strategy, therefore will have been subject to the HRA and no further assessment is necessary as these changes will not introduce any new implications.</p>	<p>The overall level of new growth was identified in Policy CS2. No direct losses to a European site predicted as a result of the policy. The recommendation of the HRA to cross refer to Policy CS10 was included in the Submission Draft Core Strategy which remains unaltered in by the Modifications.</p>
<p>Mod 3 Policy CS1 Settlement Pattern Mod 5 note in policy CS2 re Brantham</p>	<p>The modifications to policy CS1, relocate text from one part of the policy to another, delete reference to Brantham as a separate policy is now proposed for Brantham Regeneration Area (CS6a) and the addition of Brantham to the list of hinterland villages. In terms of the</p>	<p>Policy CS1 and CS2 were both subject to the HRA with CS1 having no specific recommendations and CS2 with No direct losses to a European site predicted as a</p>

	<p>HRA, the role of Brantham and the implications of regeneration of the area were included previously in Policy CS6, deletion of this text from policy CS1, does not in any way change the intended proposals for Brantham in the Core Strategy. The addition of Brantham to the Hinterland villages is to cover an omission which will provide a policy context for development in Brantham which is outside the context of any regeneration proposals for the area. This increases the number of hinterland villages to 43, an insignificant variance from the previous policy which was subject to the HRA. The additional note proposed as a modification in Policy CS2 provides an explanation regarding the relationship of Brantham to the Strategy and growth levels, now included in the policy. It reflects the variance of the approach to dealing with the regeneration of Brantham in the Core Strategy but does not change in any way the intention of what is proposed at Brantham and therefore no variance in the policy content which was the subject of the HRA.</p>	<p>result of the policy. The recommendation of the HRA to cross refer to Policy CS10 was included in the Submission Draft Core Strategy which remains unaltered in by the Modifications. Refer to New Policy CS6a.</p>
<p>Mod 6- Paragraph 2.8.1; Mod 7 Policy CS3 Chilton Woods Strategic Land Allocation and Strategy for Sudbury / Great Cornard. Mod 8 – Map A -Chilton Woods Mixed Use Allocation</p>	<p>The modification to the supporting text in paragraph 2.8.1 refers to the policies that follow in relation to strategic development sites at Sudbury and Great Cornard. It provides context and explanation to reflect the amended policies but has no direct implications. The changes to policy CS3 and accompanying Map A, reflect a number of issues which are being addressed by these modifications;</p> <ol style="list-style-type: none"> 1. To provide greater clarity and certainty by defining the boundary for the mixed use proposal in the Core Strategy, rather than identifying it as a New Direction of Growth as an extension to the site allocated as CP01 in the 2006 Local Plan and deferring to a later DPD to define the Boundary; 	<p>Policy CS3 is significantly different to the same policy in the Submission Draft Core Strategy. However, the content of it now incorporates CP01, which was previously referred to in the policy wording. The elements of the policy relating to the</p> <p>New Direction of Growth east of Sudbury and great Cornard is now in a new policy CS3a. The HRA assessed CS3 including reference to the implementation of CP01. It found that</p>

	<p>2. To allow early delivery of development in association with this site and;</p> <p>3. To reflect the need to reallocate the site allocated in the 2006 Local Plan for mixed use at Chilton CP01 as a result of the NPPF.</p> <p>Although these changes appear extensive, in the context of the Submission Draft Core Strategy, they simply clarify and provide more detail on issues and proposals included at that stage. The Submission Draft Core Strategy included the following elements in respect of growth at Chilton;</p> <p>1. Reference in text and policy CS3 to the retention and implementation of Policy CP01 for the mixed use allocation from the 2006 Local Plan. This provides for 700 new dwellings, employment uses as well as community and social infrastructure;</p> <p>2. A proposed New Direction of Growth for an extension to the CP01 allocation to accommodate for an additional 350 dwellings and ;</p> <p>3. Policy guidance in respect of the parameters and broad requirements for the new direction of growth including infrastructure and phasing. In addition reference to later DPDs to define the boundary for the New Direction of Growth and further details as appropriate.</p> <p>The scale, location and nature of development proposed are unchanged from that set out in the Submission Draft Core Strategy which was subject to the HRA. In addition the requirement of the HRA to take into account the “in-combination” impacts of other plans and programmes, the 2006 Local plan will have been included in the HRA screening carried out and reported in September 2011.</p>	<p>there were no direct losses to a European site as a result of the policy, including considering the in-combination impacts with the rest of the strategy. The recommendation of the HRA to cross refer to Policy CS10 was included in the Submission Draft Core Strategy which remains unaltered in by the Modifications.</p>
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<p>Mod 9- New Policy CS3a Strategic Broad Location For Growth - East of Sudbury/ Great Cornard</p>	<p>The modification provides a new policy for the Broad Location for Growth to the east of Sudbury / Great Cornard. This change introduces a number of changes which reflect;</p> <ul style="list-style-type: none"> • Terminology- replacing the New Direction of Growth with Broad Location for Growth • The amendments to Policy CS3 to include the reallocation of CP01 and to define the extension to Chilton as a Strategic Allocation, and therefore the need for this broad location to be presented in a new policy to provide clarity and avoid confusion. • The timing/phasing implications of when/how this broad location will be worked up further working with the local community, stakeholders and landowners through later a DPD. <p>Although the policy wording is new, the principle and location of the broad location is unchanged, and the policy provides more detailed guidance about what will need to be considered, when and by what process in order to establish more detail prior to implementation of this proposal. All these principles were included in the Submission Draft Core Strategy and therefore subject to the HRA.</p>	<p>Policy CS3 of the Submission Draft Core Strategy, included reference to the New Direction of Growth east of Sudbury and Great Cornard. Policy CS3a retains this and the additional guidance does not vary the nature, scale of principle assessed in the HRA. It found that there were no direct losses to a European site as a result of the policy, including considering the in-combination impacts with the rest of the strategy. The recommendation of the HRA to cross refer to Policy CS10 was included in the Submission Draft Core Strategy which remains unaltered in by the Modifications.</p>
<p>Mod 10 paragraph 2.8.2 Mod 11- Policy CS4 Strategic Site Allocation and Strategy for Hadleigh Mod 12 Map B to accompany CS4</p>	<p>The modification to the supporting text in paragraph 2.8.2 refers to the policy that follows in relation to the strategic development site at Hadleigh. It provides context and explanation to reflect the amended policy but has no direct implications. The changes to policy CS4 and accompanying Map B, reflect a number of issues which are being addressed by these modifications;</p> <ol style="list-style-type: none"> 1. To provide greater clarity and certainty by defining the 	<p>Policy CS4 was assessed by the HRA finding that there were no direct losses to a European site predicted as a result of the policy. The recommendation of the HRA to cross refer to Policy CS10 was included in the Submission Draft Core Strategy which remains unaltered in by the Modifications.</p>

	<p>boundary for the mixed use proposal in the Core Strategy, rather than identifying it as a New Direction of Growth;</p> <ol style="list-style-type: none"> 2. To allow early delivery of development in association with this site and; 3. To provide further guidance in respect of the requirements and parameters for the development of this site for mixed use, including providing for 250 houses, land for employment uses, infrastructure and phasing <p>Although these changes appear extensive, in the context of the Submission Draft Core Strategy, they simply clarify and provide more detail on issues and proposals included at that stage. The scale, location and nature of development proposed are unchanged from that set out in the Submission Draft Core Strategy which was subject to the HRA.</p>	
<p>Mod 13 paragraph 2.8.3</p> <p>Mod 14 Policy CS5 Strategic Site Allocation: Babergh Ipswich Fringe</p> <p>Mod 15 Map C to accompany Policy CS5</p>	<p>The modification to the supporting text in paragraph 2.8.3 refers to the policy that follows in relation to the strategic development site at the Ipswich Fringe. It provides context and explanation to reflect the amended policy but has no direct implications. The changes to policy CS5 and accompanying Map C, reflect a number of issues which are being addressed by these modifications;</p> <ol style="list-style-type: none"> 1. To provide greater clarity and certainty by defining the boundary for the mixed use proposal in the Core Strategy, rather than identifying it as a New Direction of Growth; 2. To allow early delivery of development in association with this site and; 3. To provide further guidance in respect of the requirements and parameters for the development of this site for mixed use, including providing for 350 houses, land for employment uses, infrastructure and phasing 	<p>Policy CS5 was assessed by the HRA finding that there were no direct losses to a European site predicted as a result of the policy. The recommendation of the HRA to cross refer to Policy CS10 was included in the Submission Draft Core Strategy which remains unaltered in by the Modifications.</p>

	<p>Although these changes appear extensive, in the context of the Submission Draft Core Strategy, they simply clarify and provide more detail on issues and proposals included at that stage. The scale, location and nature of development proposed are unchanged from that set out in the Submission Draft Core Strategy which was subject to the HRA.</p>	
<p>Mod 16- New paragraph- former sugar factory</p> <p>Mod 17- New Policy CS5a Sproughton Strategic Employment Land Allocation</p> <p>Mod 18- Map D to accompany CS5a</p>	<p>The former sugar beet factory at Sproughton was included in the Submission Draft Core Strategy as a Strategic employment site and listed as such in Policy CS2. This is referred to in that draft as a policy in the 2006 Local Plan which is intended to be carried forward to the Core Strategy. To reflect the requirements of the NPPF, it is required to reallocate allocations from the Adopted Local Plan if the intention is to carry them forward, to provide the appropriate level of certainty. The proposed modification, therefore allocates the site, as defined in the 2006 Local Plan and incorporates the Policy EM04, with updates to reflect the NPPF and consistency requirements, together with accompanying Map D (which reflects the 2006 site allocation).</p> <p>Although these changes appear extensive, in the context of the Submission Draft Core Strategy, they simply clarify and provide more detail on issues and proposals included at that stage. The scale, location and nature of development proposed are unchanged from that set out in the Submission Draft Core Strategy which was subject to the HRA. In addition the requirement of the HRA to take into account the “in-combination” impacts of other plans and programmes, the 2006 Local plan will have been included in the HRA screening carried out and reported in September 2011.</p>	<p>Policy CS2 listed the strategic employment sites including the sugar beet site at Sproughton, with No direct losses to a European site predicted as a result of the policy. The recommendation of the HRA to cross refer to Policy CS10 was included in the Submission Draft Core Strategy which remains unaltered in by the Modifications.</p>

<p>Mod 20 - New paragraph Wherstead Park</p> <p>Mod 21 New Policy CS5b Wherstead Park Strategic Employment Land Allocation</p> <p>Mod 22 Map E to accompany Policy CS5b</p>	<p>The site at Wherstead Park was included in the Submission Draft Core Strategy as a Strategic employment site and listed as such in Policy CS2. This is referred to in that draft as a policy in the 2006 Local Plan which is intended to be carried forward to the Core Strategy. To reflect the requirements of the NPPF, it is required to reallocate allocations from the Adopted Local Plan if the intention is to carry them forward, to provide the appropriate level of certainty. The proposed modification therefore allocates the site, as defined in the 2006 Local Plan and incorporates the Policy EM05, with updates to reflect the NPPF and consistency requirements, together with accompanying Map E (which reflects the 2006 site allocation).</p> <p>Although these changes appear extensive, in the context of the Submission Draft Core Strategy, they simply clarify and provide more detail on issues and proposals included at that stage. The scale, location and nature of development proposed are unchanged from that set out in the Submission Draft Core Strategy which was subject to the HRA. In addition the requirement of the HRA to take into account the “in-combination” impacts of other plans and programmes, the 2006 Local plan will have been included in the HRA screening carried out and reported in September 2011.</p>	<p>Policy CS2 listed the strategic employment sites including Wherstead Park with no direct losses to a European site predicted as a result of the policy. The recommendation of the HRA to cross refer to Policy CS10 was included in the Submission Draft Core Strategy which remains unaltered in by the Modifications.</p>
<p>Mod 22 Policy CS6a Brantham Regeneration Area Allocation</p> <p>Mod 23 Map F to accompany Policy CS6a</p>	<p>The modification introduces an additional Policy for the Brantham regeneration area which is based on policy EM06 of the 2006 Local Plan, which is reallocated in Policy CS6a. The policy wording is updated to reflect the NPPF and consistency requirements. The accompanying map (F) reflects the proposals map boundary in the 2006 Local Plan for EM06.</p>	<p>Policy CS2 listed the strategic employment sites including Brantham, with no direct losses to a European site predicted as a result of the policy. Brantham regeneration area was also specified in Policy CS1 with reference to</p>

	<p>The Submission Draft Core Strategy was clear in its intention to carry forward the policy EM06 from the 2006 Local Plan. Reference to regeneration at Brantham needing to be in accordance with policy EM06 was specified in policies CS1 and CS6 as well as in the supporting text. Brantham was also identified in Policy CS2 to reflect its role in the strategy for growth. The modifications provide for the same potential growth opportunities and policy requirements as in the Submission Draft Core Strategy, but provide greater clarity by having a separate policy, rather than incorporating Brantham with the Core and hinterland villages. The new policy provides further guidance, within the limitations of current information and knowledge.</p> <p>No specific levels of growth were identified for Brantham in the Submission Draft Core Strategy, however as it is acknowledged that it has unique issues associated with the need for regeneration and will be likely to include a proportion of residential development, for the purposes of the HRA (and Water Cycle Study) implications were assessed using a theoretical maximum number of dwellings of 700. This was purely for the purposes of the assessment, and the scale of appropriate housing growth associated with the Brantham regeneration remains unspecified.</p> <p>Although these changes appear extensive, in the context of the Submission Draft Core Strategy, they simply clarify and provide more detail on issues and proposals included at that stage. The scale, location and nature of development proposed are unchanged from that set out in the Submission Draft Core Strategy which was subject to the HRA. In addition the requirement of the HRA to take into account the “in-</p>	<p>development being in accordance with EM06 of the 2006 Local Plan.</p> <p>Under policy CS6 the regeneration proposal at Brantham was assessed in the HRA in most detail. No detail of the scale or type of development was specified in the Submission Draft Core Strategy (nor is it provided in the modifications). Assumptions were made for the purposes of the HRA which assumed a level of housing growth, access restrictions to the estuary, open space & Local nature Reserve provision and an indication of employment type. On the basis of this the assessment was sufficient to indicate that the brownfield site within Brantham could accommodate a level of new housing provision with appropriate green-space provision. Additional wording was recommended by the HRA which was incorporated into the Submission Draft Core Strategy and remains unaltered by the proposed Modifications.</p>
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	combination” impacts of other plans and programmes, the 2006 Local plan will have been included in the HRA screening carried out and reported in September 2011.	
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HRA and other Main Modifications

Other main modifications to policies 8, 11, 14 and 15 were all identified in the HRA as having no direct implications on the European sites and no direct recommendations other than to recommend the cross reference to policy CS10 within the policies which may lead to development, which was included in the relevant policies in the Submission Draft Core Strategy. The proposed modifications add clarity or provide further guidance and do not in themselves alter this position in respect of potential impact on a European site.

Policy CS12 is proposed in the text to be deleted as a policy and retained in the supporting text, as the issues are covered in other policies and its wording is more associated with objectives, rather than policy. This also retains the reference to the need to comply particularly with CS10, as well as other policies in the Core Strategy. This does not therefore vary the position in respect of the HRA as it will not have any direct implications on a European site.

Policy CS10 (formerly CS7) is an A3 type policy intended to conserve or enhance the natural or built environment, where enhancement measures will not be likely to have a negative effect on a European Site. The recommended wording from the HRA was incorporated in the Submission Draft Core Strategy in the Policy and in the supporting text. The modifications to the policy reflect representations made to the consultation or are to ensure compliance with the NPPF, and as such do not themselves alter this position in respect of potential impact on a European site.

Conclusion

The table above reviews the extent to which the modifications require further assessment under the Habitats Regulations. In the case of all of the modifications listed in the table, it is concluded that the changes do not sufficiently alter the policy content previously assessed in the Submission Draft Core Strategy 2011 to require further HRA. The reasons are set out in full in the table. In respect of the other modifications no further HRA for any of the proposed changes is required as they do not impact substantially on the principles and policies previously assessed.

Natural England has been consulted on the above summary of the HRA review and this will be updated to reflect any comments provided when they are available.

4. Clarification of the alternatives considered throughout the preparation of the Core Strategy.

The SA process is an iterative process which follows a stage b stage procedure. The following Stages have been followed;

Stage A - Setting the context and objectives, establishing the baseline and deciding on the scope of the Sustainability Appraisal. Preparing and consulting on the Scoping Report (2007); updated Scoping Report (2009);

Stage B - Developing and refining plan options and assessing effects.

Stage C- Preparing Issues and Options Initial SA Report (2009, Growth Options and Broad Locations SA Report (2010); Submission Core Strategy SA Report (2001); and

Stage D - Consulting on Issues and Options Initial SA Report (2009), Growth Option and Broad Locations SA Report (2010), and Core Strategy Submission Draft SA Report (2011 Final Report)

Stage E - Addendum to SA Final Report (2011) incorporating a Review of the implications of proposed focused changes on the Sustainability Appraisal and Habitats Regulations Assessment (June 2012) (this report)

Each of these stages included the consideration of alternatives, including an SA of the alternative options. These are documented in the appropriate places in the various stages of the SA reports. For completeness and ease of reference, the table below summarises the consideration of options for all policies in the Core Strategy and clearly indicates what options were considered, whether they were preferred or dismissed, the reason and at what stage in the process.

Table 4.1- Summary of the Consideration of Alternative Options

Option considered by Topic / Policy	When alternative option were considered	Preferred / dismissed	Summary of reason
Spatial Strategy			
Option 1- Business as usual	Issues and Options 2009	Preferred combined with Option 4	The proportion of this distribution reflects the opportunities and constraints which apply to each location, the responses, and the Sustainability Appraisal. <i>This option performed best in the SA with ____ and the most positive and least negative effects.</i>
Option 2- Maximum Urban concentration	Issues and Options 2009	Dismissed	Does not allow for any growth in the Core/ hinterland villages where there are needs. <i>Performed well in the Sustainability Appraisal, although will did not have any beneficial effects in the core and hinterland villages</i>
Option 3- Equitable Dispersion	Issues and Options 2009	Dismissed	Does not distribute development with any relationship to need or constraints etc. Has mixed sustainability effects with development potential being located more widely away from more sustainable locations.
Option 4- Rural Development	Issues and Options 2009	Preferred combined with Option 1	The proportion of this distribution reflects the opportunities and constraints which apply to each location, the responses. <i>Some potentially negative sustainability effects, due to wider distribution of development away from main urban areas, Also many positive including improving and sustaining rural services and locational criteria for site specifics.</i>
Option 5- New Settlement	Issues and Options 2009	Dismissed	Due to sustainability issues, and significant level of growth required and consultation responses. <i>Most negative sustainability effects.</i>

Broad Location for Growth Options			
Hadleigh			
Broad Location 1: Hadleigh East	Growth Options 2010	Preferred	<u>Sustainability</u> score 28 green; 4 amber and 3 red. Performed well in sustainability terms for Hadleigh. <u>Representations</u> seemed to support growth in one direction only with reservations expressed about growth to the south and west due to physical constraints. <u>In summary</u> : the natural and physical constraints and sensitive landscape setting of Hadleigh limit the amount and direction of growth and this broad location considered best option.
Broad Location 2: Hadleigh West	Growth Options 2010	Dismissed	<u>Sustainability</u> score 27 green; 4 amber and 5 red. Constrained in sustainability terms. <u>In summary</u> : too many natural and physical constraints
Broad Location 3: Hadleigh North	Growth Options 2010	Dismissed	<u>Sustainability</u> score 26 green; 9 amber and 1 red. Scored reasonably well, although somewhat constrained in sustainability terms. <u>In summary</u> : too many natural and physical constraints including sensitive landscape setting.
Other alternatives dismissed as considered unrealistic – Hadleigh South	Before publication of Growth Options 2010 it was considered unrealistic and therefore not assessed in more detail	Dismissed	This was not considered a realistic, reasonable option as a result of physical constraints in particular access constraints.
Sudbury / Great Cornard			
Broad Location 4: Sudbury/ Great Cornard South West	Growth Options 2010	Dismissed	<u>Sustainability</u> score 22 green; 12 amber and 2 red. Constrained in sustainability terms. <u>Representations and in summary</u> : Locations 5 and 6 were identified as the most appropriate areas for growth in Sudbury and Great Cornard. Broad locations 4 and 7 were seen to have too many constraints.

Broad Location 5: Sudbury/ Great Cornard North	Growth Options 2010	Preferred	<u>Sustainability</u> score 29 green; 4 amber and 2 red. Considered best option in sustainability terms. <u>Representations and in summary</u> : Locations 5 and 6 were identified as the most appropriate areas for growth in Sudbury and Great Cornard. Broad locations 4 and 7 were seen to have too many constraints.
Broad Location 6: Sudbury/ Great Cornard East	Growth Options 2010	Preferred	<u>Sustainability</u> score: 26 green; 11 amber and 0 red. Performed well in sustainability terms. <u>Representations and in summary</u> : Broad locations 4 and 7 were seen to have too many constraints.
Broad Location 7: Sudbury/ Great Cornard South East	Growth Options 2010	Dismissed	<u>Sustainability</u> score: 24 green; 9 amber and 2 red. Scored reasonable in sustainability terms. <u>Representations and in summary</u> : Broad locations 4 and 7 were seen to have too many constraints.
No alternatives dismissed as unrealistic			
Ipswich Fringe			
Broad Location 8: Ipswich Fringe West	Growth Options 2010	Preferred	<u>Sustainability</u> score: 26 green; 9 amber and 1 red. Scored reasonable in sustainability terms. <u>Representations</u> : public consultations showed that in accepting that one location may come forward opinion seemed to be unanimous that this should only happen if it were accompanied by improvements to the transport network and that it takes into consideration the proximity to the Stour & Orwell SPA and the need for any development to be closely reviewed through the HRA. <u>In Summary</u> : to create mixed and balanced sustainable communities need to have proportion of Babergh's growth in Ipswich Fringe. Constraints identified addressed in policy. Considered best option in Ipswich Fringe.

Broad Location 9: Ipswich Fringe South West	Growth Options 2010	Dismissed	Sustainability score: 25 green; 5 amber and 5 red. Constrained in sustainability terms
Other alternatives beyond the A12/14 corridor including Strand / Bourne Hill dismissed as considered unrealistic including small, virtually free- standing new town	Before publication of Growth Options 2010 it was considered unrealistic and therefore not assessed in more detail	Dismissed	Locations proposed away from urban areas would compromise the overriding sustainable strategy for growth and therefore considered unrealistic and dismissed. The new settlement concept scored poorly in sustainability terms (Issues and Options 2009). Limited land availability and physical constraints such as the sewerage works; allotment gardens; woodland / parks and flood risk around the southern end of the south west fringe limited realistic options and they were therefore dismissed.
Housing Growth Options			
Scenario 1 Balancing Housing and economic growth (A, B and C)	Growth Options 2010	Partially preferred but not wholly	Although a jobs led strategy is opted for based on 1C, the equivalent housing target at 420 a year was considered unsustainable in terms of constraints and infrastructure and undeliverable given the market conditions. This also applied to housing growth for 1A and 1B. <i>The sustainability effects are mixed with more moderately positive than negative. Other policies are likely to be able to mitigate any potentially negative effects</i>
Scenario 2- Address affordable housing needs and market housing needs	Growth Options 2010	Dismissed	Although it would enable more housing needs to be met, it was considered to be unsustainably and unrealistically high. <i>Performance in the SA was mixed however, more moderately negative effects were predicted than most other scenarios.</i>
Scenario 3- Depressed market and continuing the existing level of development	Growth Options 2010	Dismissed	Considered to make an inadequate contribution to meeting new homes. <i>In terms of SA performance there were few significant effects, either positive or negative.</i>

Scenario 4- Market intervention/ quick market recovery and continuation of existing level of development	Growth Options 2010	Partially Preferred but not wholly	The new home numbers was considered as the most suitable level and supported by the evidence, although a slightly higher annual rate was considered appropriate, sustainable and deliverable. <i>In terms of the SA there are a few moderately positive effects, but no significant or moderately negative.</i>
Employment Growth Scenarios			
Scenario 1- Business as usual	Growth Options 2010	Dismissed	Based on the former RSS target. <i>In terms of SA there are mixed effects with a few moderately positive.</i>
Scenario 2- Shortfall forecast figure one-third of former RSS jobs target	Growth Options 2010	Dismissed	Higher than previous jobs growth and over optimistic particularly given the decline in public sector jobs. <i>In terms of the SA there is a mixture of effects with more moderately/significantly negative effects, but also some positive effects. More than other options potentially due to the higher level of growth associated with this option.</i>
Scenario 3- Shortfall forecast figure and percentage growth to the jobs target up to 2031	Growth Options 2010	Preferred	<i>In terms of the SA there is a mixture of effects with more moderately/significantly negative effects, but also some positive effects. More than some other options potentially due to the higher level of growth associated with this option.</i> As a jobs led plan considered important to get the level at a suitable level and to be ambitious, this level considered to be sustainable and can be provide through mixture of sites incl. existing and strategic allocations
Scenario 4- Jobs growth target in accordance with housing growth target	Growth Options 2010	Dismissed	Level of jobs growth considered to be inadequate based on the level of housing growth which is suitable, would equate to almost half as many jobs as the preferred option. <i>This option performed best in SA terms with fewer negative effects.</i> However considered inadequate to meet the predicted needs.

Strategic Allocations Mixed Use			
Ipswich Fringe			
Option 1- Land between A14, A1214 and Hadleigh Road (A1071)	Addendum to Sustainability Appraisal 2012	Preferred	<p>Sustainability: Performed best in Sustainability terms against the objectives reassessed relating to site specific considerations. The scores reflect its location further away from site specific constraints than alternatives.</p> <p><u>In summary:</u> The site is already partly developed, is available and has the potential to provide a new community around existing dwellings within walking distance of services. It has no particular environmental or landscape constraints associated with it.</p>
Option 2- Land North of A1071 (Hadleigh Road) - Chantry Vale	Addendum to Sustainability Appraisal 2012	Dismissed	<p>Sustainability: Did not perform as well as option 1, largely due to the proximity to Chantry Park as a Registered Park and Garden as well as a number of listed buildings.</p> <p><u>In summary:</u> This area is significantly larger area and has more complex issues associated with development. Its availability and deliverability is unproven and parts of it are of high landscape quality and the area includes Chantry Park which is a Registered Park and Garden. Whilst there is clearly the potential and the capacity for development of this land, an allocation in this area at this stage may be premature and lead to an unacceptable piecemeal approach that would be damaging to a comprehensive plan for its future. For these reasons, the site is not sequentially preferable.</p>
Sudbury (Chilton)			
Option 1 - Accommodate the additional 350 dwellings within the boundary defined for CP01 through intensification within the allocated area (No	Addendum to Sustainability Appraisal 2012	Dismissed	<p>Sustainability: This option performed well in sustainability terms as it does not require any further land take, however in terms of other criteria it is less favourable and the quality of development could be compromised.</p> <p><u>In summary:</u> this would not lead to any further land take, so in</p>

extension of the boundary).			respect of many of the criteria scores positively, as there are no additional site specific issues not addressed by the original allocation. Could compromise the quality of the development.
Option 2 - Accommodate additional growth through an extension of the boundary to the North across whole / part of the site.	Addendum to Sustainability Appraisal 2012	Dismissed	<p>Sustainability: Performance in the SA against the 3 objectives reflects the constraints including coalescence concerns if expansion was to go further north.</p> <p><u>In summary:</u> Allow for sufficient land to ensure a high quality development could be delivered. Land availability is uncertain and unproven. There are landscape constraints associated with extending further north, as the land rises away from Sudbury to the north. A further constraint is the potential for coalescence issues with Great Waldingfield, Acton and Newmans Green. It is important that this is resisted and that there is a clear distinction between the Chilton development and the adjoining settlements.</p>
Option 3 - accommodate additional growth through extending the boundary to the west	Addendum to Sustainability Appraisal 2012	Preferred	<p>Sustainability: Performed well in terms of the SA of the 3 objectives, with few negative impacts evident. Also allows for additional growth to be accommodated to a high quality providing the necessary additional capacity.</p> <p><u>In summary:</u> The land is available. Extending the boundary to the west allows for an access to be located in this area and sufficient land for the site to accommodate the additional 350 dwellings whilst developed efficiently and to a high quality. No landscape or environmental constraints. Coalescence issue is less evident, as it is remote from the built up area of Long Melford, and extends an area of land already allocated for development to align with field boundaries / features.</p>
Option 4 - Accommodate the additional growth by an extension of CP01 boundary to the West and in part to the north	Addendum to Sustainability Appraisal 2012	Dismissed	<p>Sustainability: In terms of the SA, the results for options 2 and 3 are relevant. There is no proven justification for extending the Chilton allocation to the north and the west. Therefore preferred to only extend in the direction which demonstrates the least overall constraints, including in terms of the SA (Option 3 only).</p> <p><u>In summary:</u> This combines options 2 and 3. There is no proven justification for requiring an extension to both the north and the west to accommodate the additional growth.</p>

Hadleigh			
Hadleigh Policy CS4.	Addendum to Sustainability Appraisal 2012	Preferred	<p>Sustainability: No site specific alternatives were assessed for the definition of the site boundary, therefore this was assessed as an allocation showing no overall variation from the broad location assessment. Comparison with alternatives is therefore based on the Broad Location assessment where this was the preferred location in SA terms compared to alternatives in Hadleigh.</p> <p><u>In summary:</u> The 2006 Local Plan allocations were considered, and the only option to emerge for this area was to design the Strategic Allocation as a logical extension to this development and as close as possible to the built up area of the town and services / facilities. No further assessment of alternatives is therefore appropriate.</p>
Strategic Employment Allocations			
Policy 5a Strategic allocation at Sproughton (reallocation of EM04) Option to reallocate	Issues and Options 2009 And June 2012	Preferred	Considered indirectly as part of Issues and Options EMP1 and EMP2 to retain existing allocations in the Local Plan, of which this is one. <i>Performed well in SA with few negative scores and limited negative effects.</i>
Option not to reallocate EM04	June 2012 addendum	Dismissed	Not reallocating is the only alternative, as the opportunities for strategic employment on this site are specific to the location to generate enhancement and regeneration. Alternatives sites are therefore not an option as they would not address the specific issues they set out to achieve.
Policy 5b Wherstead Park reallocation of EM05. Option to reallocate EM05	Issues and Options 2009 And June 2012	Preferred	Considered indirectly as part of Issues and Options EMP1 & EMP2 to retain existing allocations in the Local Plan, of which this is one. <i>Performed well in SA with few negative scores and limited negative effects</i>
Option not to reallocate EM05	June 2012 addendum	Dismissed	Not reallocating is the only alternative, as the opportunities for strategic employment on this site are specific to the location to generate enhancement and regeneration. Alternatives sites are therefore not an option as they would not address the specific issues they set out to achieve.

Policy CS6a Brantham Regeneration Area allocation. Option: Reallocation of EM06	Issues and Options 2009 Submission Draft SA 2011 And June 2012	Preferred	Considered indirectly as part of Issues and Options EMP1 and EMP2 to retain existing allocations in the Local Plan, of which this is one. <i>In terms of SA, the site was the subject of a more specific SA as part of CS6 in the Submission Draft SA. There are many constraints associated with environmental issues, including flood risk and sensitive sites, however, the particular unique problems with this site mean that doing nothing is not an option and the potentially negative effects need to be managed through mitigation. HRA also assessed and made recommendations reflected in the Submission draft CS.</i>
Option: Not to reallocate EM06		Dismissed	Not reallocating is the only alternative, as the opportunities for strategic employment on this site are specific to the location to generate enhancement and regeneration. Alternatives sites are therefore not an option as they would not address the specific issues they set out to achieve. Regeneration is a priority and not acceptable to leave as it is.
Employment Land Provision (approach)			
Option 1: Maintain current allocations and seek to gain increase in land availability	Issues and Options 2009	Preferred partially	<u>Sustainability</u> : +11 -2 Positive effects are anticipated such as reducing unemployment and provision of sufficient employment land. Negative effects include loss of Greenfield and agricultural land. Mitigation includes careful site selection. <u>In summary</u> : Retention of existing allocations together with strategic allocations as part of mixed used development has sustainability benefits and is the preferred approach
Option 2: Maintain current allocations and allocate new sites	Issues and Options 2009	Preferred partially	<u>Sustainability</u> : +6 ?13 Less positive effects than option one but more unknown effects as it would depend on the location of new employment sites. <u>In summary</u> : Retention of existing allocations together with strategic allocations as part of mixed used development has sustainability benefits and is the preferred approach

Option 3: Maintain current allocations and allocate at local centres and more rural locations	Issues and Options 2009	Dismissed	<u>Sustainability</u> : +9 -5 ?1 This option had a number of positive effects. Negative effects include poor access to services. <u>In summary</u> : Wider dispersal of employment sites is not the most sustainable option.
Option 4: De-allocate some sites not already developed and allocate elsewhere	Issues and Options 2009	Dismissed	<u>Sustainability</u> : +6 ?13 Similar to the second option, however additional significant unknown cumulative and synergistic effects anticipated depending on the location of sites. <u>In summary</u> : The existing allocated sites are located close to urban areas or the A14 corridor. In addition some of them provide the opportunity to contribute towards site specific regeneration enhancements which has sustainable and wider benefits. New allocations would not allow for these benefits and may be directed towards less sustainable locations.
Option 5: Concentrate on provision of new employment land in the same locations as residential development, or through mixed use developments	Issues and Options 2009	Preferred partially	<u>Sustainability</u> : +11 -2 ?2 Similar to option one as most of the existing employment sites are close to urban areas or the larger villages in the district. Unknown impacts identified include the impact on town centres depending on their locations and the uses allowed at these sites. <u>In summary</u> : Including employment within the strategic allocations as part of mixed used development has sustainability benefits and is the preferred approach, together with the retention of employment sites where appropriate.
Affordable Housing			
Affordable Housing Requirements – percentages required from new development			
Option 1: Reduce % requirement to less than 35%	Issues and Options 2009	Dismissed	<u>Sustainability appraisal</u> : +4 positive impacts such as reducing poverty and reducing homelessness. <u>In summary</u> : high need for affordable housing in Babergh and viability showing that could require 35% and therefore this option is not considered the most appropriate option.

Option 2: Leave % requirement at 35%	Issues and Options 2009	Preferred	<u>Sustainability appraisal</u> : ++2 +2 positive impacts such as reducing poverty and reducing homelessness but predicted that some would be significantly positive. <u>In summary</u> : Based on need but also viability information this is considered the most appropriate option for Babergh
Option 3: Increase% requirement to more than 40%	Issues and Options 2009	Dismissed	<u>Sustainability appraisal</u> : ++3 +1 positive impacts such as reducing poverty and reducing homelessness but predicted that some would be significantly positive. The option could also have a negative effect in terms of housing delivery. <u>In summary</u> : Although this could in theory provide more affordable homes it is not considered achievable based on viability evidence for Babergh.
Affordable Housing Site thresholds (number of dwellings for requirement of AH provision)			
Option 1: Lower % of provision on development between 10-14 units and lower % for developments between 5-9 units	Issues and Options 2009	Dismissed	<u>Sustainability</u> : +4 There are several advantages to this option relating to social objectives such as increasing the range and affordability of housing and increasing neighbourhood satisfaction. Significantly positive long term, cumulative and synergistic effects predicted. <u>In summary</u> : Evidence regarding viability showed that small sites would still be viable to provide for affordable housing and as a result of the number of small sites below a 3 dwelling threshold coming forward in Babergh this approach was dismissed
Option 2: Standard % and lower thresholds	Issues and Options 2009	Preferred	<u>Sustainability</u> : +4 There are several advantages to this option relating to social objectives such as increasing the range and affordability of housing and increasing neighbourhood satisfaction. Significantly positive long term, cumulative and synergistic effects predicted. <u>In summary</u> : Evidence regarding viability showed that small sites would still be viable to provide for affordable housing and as a result of the number of small sites below a 3 dwelling threshold coming forward in Babergh this approach was considered the most appropriate and preferred one for this district.

Gypsies, Travellers and Travelling Showpeople's accommodation			
Option1: Plan for provision through expansion of existing sites	Issues and Options 2009	Combination of all options considered	<p><u>Sustainability</u>: +4; -13 This option is likely to have a number of negative effects and some positive effects. Negative effects include access to services and loss of Greenfield land. The positive effects include reducing poverty and provision of sufficient housing. <u>In summary</u>: Only one existing pitch provided in Babergh and therefore limited scope to expand existing sites at present. The best approach was considered to be a combination of all the options considered as this would also create scope to address the negative effects identified in the sustainability appraisal.</p>
Option 2: Plan for provision through entirely new sites	Issues and Options 2009	Combination of all options considered	<p><u>Sustainability</u>: +4 ?14 This option is likely to have mostly unknown effects with some positive effects also identified. Unknown effects such as access to services, etc have been identified as this option does not indicate where new sites will be located. Similar positive effects to the previous option were identified.</p> <p><u>In summary</u>: Only one existing pitch provided in Babergh and therefore limited scope to expand existing sites at present. The best approach for Babergh was considered to be a combination of all the options and this would provide scope to ensure that the unknown impacts can be managed.</p>
Option 3: A combination of 1 & 2	Issues and Options 2009	Combination of all options considered	<p><u>Sustainability</u>: as above</p> <p><u>In summary</u>: as above</p>
Option 4: Provision through rural exception sites	Issues and Options 2009	Combination of all options considered	<p><u>Sustainability</u>: +6 -9 ?3 This option is likely to have a number of negative and positive effects. Negative effects include access to services, loss of Greenfield land. Positive impacts include reducing poverty and provision of sufficient housing.</p> <p><u>In summary</u>: There may be a need to provide for rural exception sites and but only choosing this option may not address all the needs that could arise. Therefore the best approach for Babergh was considered to be a combination of all the options and this would provide scope to ensure that the unknown and negative impacts can be managed.</p>

Option 5: Plan for provision through planned sites wherever major developments come forward	Issues and Options 2009	Combination of all options considered	<p><u>Sustainability</u>: +13 -2 ?3 A number of positive effects were identified including access to services and the provision of sufficient housing.</p> <p><u>In summary</u>: This option scored the best in sustainability terms but it may not address all the needs that could arise. Therefore the best approach for Babergh was considered to be a combination of all the options and this would provide scope to ensure that the unknown and negative impacts can be managed</p>
Built and Natural Environment			
Flood Risk- Option 1 Development that cannot be located away from flood risk should contribute towards mitigation	Issues and Options 2009	Preferred	<p><u>Sustainability</u>: ++2 +2 National policy controls development in flood risk areas to a degree, but where development cannot be situated away from flood risk areas, contributions towards mitigation should be made.</p> <p><u>In summary</u>: Most sustainable option and considered a realistic option for Babergh</p>
Option 2: Development that cannot be located away from flood risk does not need to contribute towards mitigation	Issues and Options 2009	Dismissed	<p><u>Sustainability</u>: -2 -2 It would have negative impacts if development is allowed to take place in an area of higher flood risk without requiring some contribution towards mitigation measures.</p> <p><u>In summary</u>: Not sustainable option and not considered an appropriate option for Babergh</p>
Pollution: Option 1: Locate development away from sources of pollution and develop in areas which minimise the use of the car	Issues and Options 2009	Preferred	<p><u>Sustainability</u>: ++9 +6 -1 Many of the benefits stem from the need to locate development in accessible locations, reducing the need to use the car.</p> <p><u>In summary</u>: Most sustainable option. Development located away from air quality management area. Policy CS10 will also ensure than an appropriate level of services, facilities and infrastructure are available to serve proposed development, seeking to minimise travel by using the 'walking, cycling, public transport, commercial vehicles and cars' hierarchy and where appropriate requiring a transport assessment and travel plan.</p>

Option 2: allow development in areas where air quality is an issue only if mitigation measures are put in place	Issues and Options 2009	Dismissed	<p><u>Sustainability</u>: ++3 +6 -2 ?1 This is a more limited option which reacts to development. Thresholds and details of mitigation measures would need to be determined. Areas where air quality is an issue would improve where development takes place, but care must be taken that areas where it is not an issue do not get worse.</p> <p><u>In summary</u>: Positive benefits but not most sustainable option. Not considered most appropriate option for Babergh.</p>
Option 3: Develop a specific air quality management policy	Issues and Options 2009	Dismissed	<p><u>Sustainability</u>: ++6 +11 -3 ?1 Developing a specific air quality management policy should ensure that overall levels are maintained or improved. This policy could also be linked with, renewable energy or other sustainability objectives into policy.</p> <p><u>In summary</u>: Positive benefits but not most sustainable option. Not considered most appropriate option for Babergh.</p>
Sustainability and Climate Change			
Residential Development Standards			
Option 1: National minimum standards	Issues and Options 2009	Dismissed	<p><u>Sustainability</u>: +6 The option will result in the more efficient use of resources and energy</p> <p><u>In summary</u>: This was not considered an appropriate option for Babergh, however Policy CS10 address this aspect by requiring that new development be appropriately designed to be energy efficient and that sustainable building methods are used to optimise energy efficiency.</p>
Option 2: Higher standards introduced a year earlier	Issues and Options 2009	Dismissed but will be considered in more detail in SSA where viable	<p><u>Sustainability</u>: ++1 +6 The option will result in further improvements in the use of resources and in the long run greater energy efficiency and use of renewable energy sources</p> <p><u>In summary</u>: This was not considered an appropriate option for Babergh, however Policy CS10 address this aspect by requiring that new development be appropriately designed to be energy efficient and that sustainable building methods are used to optimise energy efficiency.</p>

Option 1: all new build development 1 dwelling and above	Issues and Options 2009	Dismissed	<u>Sustainability</u> : ++5 +1 There are several significantly positive and some positive benefits to this option including increasing recycling as well as the reducing the use of energy. <u>In summary</u> : There is not sufficient evidence to show that this option is achievable in the Babergh district.
Option 2: all new build development 3 dwellings and above	Issues and Options 2009	Dismissed	<u>Sustainability</u> : +6 There are positive benefits identified in this option but not so many significantly positive effects as for option one <u>In summary</u> : Like the previous option there is not sufficient evidence to show that this option is achievable in the Babergh district
Option 3: all development 3 dwellings and above	Issues and Options 2009	Preferred	<u>Sustainability</u> : +6 Same as above <u>In summary</u> : Large new developments may create economies of scale that may provide the potential for achieving lower level/ zero carbon homes in advance of changes to Building Regulations. This option also has several predicted positive sustainability impacts.
Non Residential development			
Option 1: National minimum standards (building regulations)	Issues and Options 2009	Dismissed	<u>Sustainability</u> : +5 ?1 <u>In summary</u> : Less sustainable than chosen option
Option 2 BREEAM Good Standard	Issues and Options 2009	Dismissed	<u>Sustainability</u> : +6 ?2 <u>In summary</u> : Less sustainable than chosen option
Option 3: BREEAM very Good Standard	Issues and Options 2009	Preferred Option	<u>Sustainability</u> : ++1 +9 <u>In summary</u> : Non-residential development creates economies of scale that may provide the potential for achieving more sustainable designs in advance of changes to Building Regulations. This option also has several predicted significantly positive and positive sustainability impacts. Although not the most sustainable option it is considered an achievable option in Babergh at present.

Option 4: BREEAM excellent Standard	Issues and Options 2009	Dismissed	<u>Sustainability</u> : ++3 +12 <u>In summary</u> : Most sustainable option but it is not considered achievable in Babergh at present.
Option 1: All development of 1 or more	Issues and Options 2009	Preferred	<u>Sustainability</u> : ++4 +8 <u>In summary</u> : Most sustainable option and considered that this may be achievable in the district.
Option 2: development over 0.1ha or 100sq m	Issues and Options 2009	Dismissed	<u>Sustainability</u> : ++1 +8 ?1 <u>In summary</u> : Not the most sustainable option
Option 3: development over 1ha or 1000sq m	Issues and Options 2009	Dismissed	<u>Sustainability</u> : +5 ?2 <u>In summary</u> : Not the most sustainable option
Renewable energy			
Option 1: No requirement	Issues and Options 2009	Dismissed	<u>Sustainability</u> : +4 Some positive impacts identified as it is considered that renewable energy use will increase as a result of building regulations. <u>In summary</u> : Not most sustainable option.
Option 2: national or regional requirement	Issues and Options 2009	Preferred Option	<u>Sustainability</u> : +5 -1 Several positive effects identified relating to reduced use of energy. The negative effect identified related to the impact on townscape and landscape and this has been addressed in other policies included in the Core Strategy. For this reason, this option is considered the most sustainable. <u>In summary</u> : Most sustainable option and considered most appropriate for Babergh.
Option 1: No requirement for decentralised renewable energy	Issues and Options 2009	Dismissed	<u>Sustainability</u> : +3 -3 ?1 Some positive impacts identified as it is considered that renewable energy use will increase as a result of building regulations. <u>In summary</u> : Not most sustainable option but still positive benefits

Option 2: At least 25% requirement for decentralised renewable energy	Issues and Options 2009	Dismissed but included requirement for 10% (see previous option 2)	<p><u>Sustainability</u>: +7 -1 Higher number of positive effects identified but could have negative impact on townscape/ landscape.</p> <p><u>In summary</u>: Chosen option was between Option 2 and option one and it would therefore have several positive effects with some predicted negative effects. Option 2 was not considered achievable for Babergh. Draws justification from RSS. Development Management policies may identify specific opportunities for decentralised heat and power networks.</p>
Option 1: applies to all developments	Issues and Options 2009	Dismissed	<p><u>Sustainability</u>: +9 -1 Several positive effects predicted but this could adversely affect landscape/ townscape. Most sustainable option.</p> <p><u>In summary</u>: Not chosen as not considered achievable option for Babergh at present as larger developments often have economies of scale that make it viable and possible to provide decentralised energy.</p>
Option 2 applies to 1 dwelling or 100sq m non residential floorspace.	Issues and Options 2009	Dismissed but included reference to large scale development	<p><u>Sustainability</u>: +5 -1 There are several benefits from this option but they are more limited and they could still have an adverse impact on townscape or landscape.</p> <p><u>In summary</u>: Chosen option was variation of Option 2 and predicted that it will have several positive effects with some predicted negative effects. Although not most sustainable option, variation chosen as considered achievable option for Babergh with larger developments that often have economies of scale that could make it viable and possible to provide decentralised energy. Draws justification from RSS.</p>
Retail and Town Centres			
Option 1: Business as usual	Issues and Options 2009	Preferred	<p><u>Sustainability</u>: +21 Variety of benefits identified for option including providing local jobs and opportunities for local business as well as cutting down need to travel by car.</p>

			<u>In summary:</u> Several positive impacts and short term effects similar to Option 2. Considered appropriate to define retail hierarchy and make provision for retail needs of town centres in district but would be more beneficial if this option is combined with Option 2.
Option 2: Promote and enhance local and town centres	Issues and Options 2009	Preferred	<u>Sustainability:</u> +21 Benefits similar to above option but over time more significant effects. <u>In summary:</u> Similar sustainability benefits but more significant over long term and therefore most sustainable option. Considered appropriate to combine option 1 and 2 as this will provide a strategy for town centres but also for smaller village centres in the district.
Option 3: Retail and management strategy for Sudbury and Hadleigh Town centres	Issues and Options 2009	Dismissed	<u>Sustainability:</u> +15 -4 This option focuses on town centres but potentially neglects the smaller centres. <u>In summary:</u> Not most sustainable option and not appropriate for Babergh.
Social and community infrastructure			
Green infrastructure included in policies – Core Strategy or Development Management?	Issues and Options 2009	Preferred	<u>Sustainability:</u> ++2 +2 Several positive effects identified in sustainability appraisal. <u>In summary:</u> Sustainable option and included in policies in Core Strategy
Infrastructure importance			
Option 1: All of equal importance	Issues and Options 2009	Preferred	<u>Sustainability:</u> ++1 +11 This option ensures that development is supported by a balanced and wide range of facilities. <u>In summary:</u> Most sustainable option and preferred option

Option 2: Some greater importance than others	Issues and Options 2009	Dismissed	<u>Sustainability</u> : ++2 -9 ?2 This option is beneficial for specific facilities but then leads to weaker access to other facilities. <u>In summary</u> : Not sustainable option and dismissed
Option 1: threshold applied above which contributions are required	Issues and Options 2009	Partly dismissed but included that CIL will be introduced	<u>Sustainability</u> : +1 -1 ?5 Details would need to be worked out. If the threshold is too low there is a risk that smaller developments will not come forwards and that rural development may contribute to demand but not require contributions for services if thresholds are too high. <u>In summary</u> : Partly dismissed and CIL will be dealt with separately setting out appropriate thresholds. Reference to CIL included in Core Strategy as this could have some important positive effects.
Option 2:106 / case by case assessment	Issues and Options 2009	Preferred	<u>Sustainability</u> : ++2 +6 Several significantly positive and positive effects identified and considered a sustainable option. <u>In summary</u> : Included and considered sustainable.
Provision for social and community infrastructure through CS or Development management?	Issues and Options 2009	Preferred	<u>Sustainability</u> : ++4 +7 Several significantly positive and positive effects identified and considered a sustainable option. <u>In summary</u> : Included and considered sustainable.
Physical Infrastructure			
Option 1: BAU secure infrastructure through case by case 106 assessment	Issues and Options 2009	Preferred	<u>Sustainability</u> : ++4 +7 –1 Need to ensure that smaller developments also contribute and that needs are addressed (reactive) and it is difficult to coordinate significant funding projects through 106 <u>In summary</u> : Sustainable option and included. Responses indicated that a combination of options is preferred. Options 1, 2, 3 and part of option 4 were combined as it was considered that this is the most appropriate for local circumstances.




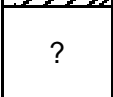

Option 2: implement a tariff based approach	Issues and Options 2009	Preferred	<p><u>Sustainability</u>: ++3 +8 -1 Need to carefully consider thresholds, needs and viability. Difficult to coordinate larger projects through tariffs.</p> <p><u>In summary</u>: Sustainable option and included. Responses indicated that a combination of options is preferred. Options 1, 2, 3 and part of option 4 were combined as it was considered that this is the most appropriate for local circumstances.</p>
Option 3: make provision for large scale infrastructure	Issues and Options 2009	Preferred	<p><u>Sustainability</u>: ++7 +8 ?1 Would need to use with other measures for contributions else would not address need. More pro-active than Option 1 & 2.</p> <p><u>In summary</u>: Sustainable option and included. Responses indicated that a combination of options is preferred. Options 1, 2, 3 and part of option 4 were combined as it was considered that this is the most appropriate for local circumstances.</p>
Option 4 secure grant funding from national government or bigger projects	Issues and Options 2009	Amended - included that the Council will work with service providers, developers and other partners to create sustainable places in Babergh	<p><u>Sustainability</u>: ++8 +7 ?1 Similar to Option 3.</p> <p><u>In summary</u>: Sustainable option and partly included. Responses indicated that a combination of options is preferred. Options 1, 2, 3 and part of option 4 were combined as it was considered that this is the most appropriate for local circumstances.</p>

Appendix: Addendum to the Sustainability Appraisal Final Report

Review of the Sustainability Assessments for the proposed changes to the submission draft core strategy

JUNE 2012

Key to Broad Locations Assessment

	In conformity with the criterion		Not relevant to criterion / Neutral effects
	Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified		Insufficient information is available
	In conflict with the criterion		

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
Proposed Amended Policy CS3 Allocation of the strategic growth area at Chilton, north of Sudbury, including the reallocation of the Adopted Local Plan (2006) policy CP01 and proposed extended boundary (Proposals Map A)					
Proposed Use - Mixed Use					
Social					
1	To improve the health of the population overall	Is it within 30 mins of a GP, dentist and hospital by public transport?	The Allocation Area is within 30min of a GP by public transport.		
		Will it lead to a loss of public open space or open access land?	The Allocation Area is not likely to result in any loss of public open space.		
		Will it improve accessibility by Public Rights of Way?	A number of PRoW cross the site and there are cycle routes adjacent to the site. These will improve accessibility to the Allocated Area.		

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
2	To maintain and improve levels of education and skills in the population overall	Is it within 30 mins of a school by public transport?	The site is within 30 mins of a school by public transport		
		Is it within walkable/cyclable distances (800m and 2-5km)?	It is within walking and cyclable distance. The nearest school is adjacent to the Allocation Area boundary.		
4	To reduce poverty and social exclusion	Will the broad location be situated near or within LSOAs in the most deprived 20% to 40% in the country?	As the Allocation Area is not situated close to or within a deprived area, opportunities for regeneration are not likely.		
5	To improve access to key services for all sectors of the population	Is it within 30 mins of the town centre by public transport?	The Allocation Area is within 30 mins of the town centre by public transport.		
		Is it within walkable/cyclable distances (800m and 2-5km) to key services?	It is within cyclable distance but not within walkable distance. The town centre is located approximately 1.5km from the allocation area.		
		Is it within 30 mins of a supermarket/ shopping centre by public transport?	The Allocation Area is within 30 mins of a shop / supermarket by public transport.		
		Is it within walkable/cyclable distances (800m and 2-5km) to supermarkets / shopping centre?	It is within cyclable and walking distance. The nearest grocery shop is adjacent to the allocation area.		
		Is the broad location proposed for mixed-use development with good accessibility to local facilities?	The Allocation Area is proposed for mixed use development. Good accessibility to local facilities is one of the policy requirements.		
6	To offer everybody the opportunity for rewarding and satisfying employment	Is the broad location proposed for employment or mixed use with employment included?	The Allocation Area is proposed for mixed use development with employment included.		
7	To meet the housing requirements of the whole community	Is the broad location proposal over the relevant thresholds for the application of affordable housing policy? Babergh Local Plan policy HS08 specifies that sites which come forward for residential development in a settlement with a population of 3,000 or more and which are 0.5ha	The Allocation Area would be capable of accommodating larger sites and provision of affordable housing.		

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
		or more in size, capable of accommodating at least 15 dwellings, or on sites of similar size and capacity on which a renewal of planning permission is sought, the District Council will require up to 35% of dwellings to be provided in the form of affordable housing to meet identified local needs.			
8	To improve the quality of where people live and encourage community participation	Does the broad location have a good access to natural green space?	The Allocation Area contains natural green spaces within it, which may help stimulate social interaction.		
Environmental					
9	To maintain and where possible improve water quality	Is the broad location proposed within a groundwater source protection zone?	The Allocation Area is within Zone 2 (Outer Zone) and is adjacent to / in part overlaps an Inner Zone.		
10	To maintain and where possible improve air quality	Is the broad location proposed within an Air Quality Management Area (AQMA)?	The Allocation Area is not within an AQMA.		
11	To conserve soil resources and quality	Is the broad location proposed on Greenfield land?	The Allocation Area is proposed on Greenfield Land.		
		Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3a)?	The Allocation Area is located on Grade 3 Agricultural Land		
		Will it lead to remediation of contaminated land?	A small area at the eastern edge of the site is identified as an area of potential contamination (associated with the former Gt Waldingfield Airfield). Depending on what use this part of the site is put to, remediation opportunities may arise		
14	To reduce the effects of traffic on the environment	Does the broad location have good accessibility to local facilities (as assessed above)?	The Allocation Area can be accessed by public transport, therefore, it should help minimise the need for travel and reliance on the private car.		

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
15	To reduce emissions of greenhouse gases from energy consumption	Will the broad location proposal promote the incorporation of small-scale renewable in developments?	The site is large enough to provide opportunities for incorporating small scale renewable energy proposals.		
16	To reduce vulnerability to climatic events	Does the broad location lie within the flood risk zones (2, 3a, 3b) identified in the SERA and have a proposed 'non-compatible' use or is located within 9m of a river?	The Allocation Area is not within a Flood Risk Zone.		
17	To conserve and enhance biodiversity and geodiversity	Is the broad location in proximity to a Special Protection Area (SPA), Special Area of Conservation (SAC) or broad location of Special Scientific Interest (SSSI)? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 2-4 km of a SPA, SAC or SSSI. Differentiation is made between European and national designations given a different level of protection granted to these sites.	The Edwardstone Wood SSSI is located to the east within a 4km distance but is further than 2km away from the Allocated Area site boundary.		
		Is the broad location in proximity to a County Wildlife Site, Local Nature Reserve or Ancient Woodland? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 500m of a site.	The Allocation Area lies adjacent to (covers in part) a CWS. The site Masterplan will be required to take account of all such area and propose appropriate mitigation measures accordingly.		
		Are BAP habitats known to be represented within the broad location?	There are no BAP habitats within the Allocated Area.		
		Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS (Regionally Important Geological / Geomorphological	There are no geological SSSI's or RIGS within the Allocated Area.		

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
		Sites)? The broad location within 500m of a SSSI will be coded red and within 1km will be coded amber. The broad location adjacent to RIGS will be coded red and within 500m - amber.			
18	To conserve and where appropriate enhance areas of historical and archaeological importance	Are there any listed buildings within or adjacent to the broad location?	As necessary, the policy will require that appropriate measures be taken to preserve the setting of Chilton Hall (Grade 2*), the Garden Wall (Grade 2) and the Church of St Mary (Grade 1) - which are all located south of the Allocation Area.		
		Is the broad location in or adjacent to a Conservation Area? Note: The broad locations located in a Conservation Area were coded red, those within 40 metres of a town Conservation Area or within 800m of a village Conservation Area (a PPG2 criterion) were coded orange and broad locations not in proximity to any Conservation Areas were coded green.	The Allocation Area is not within or adjacent to a Conservation Area.		
		Is the broad location in or adjacent to a Historic Park and Garden? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a Historic Park and Garden.	The Allocation Area is adjacent to the wider Historic Park and Garden area at Chilton Hall. However, effective masterplanning, and the use of well designed and integrated Green Infrastructure should enable the development not to impact on the setting of Chilton Hall.		
		Does the broad location contain or it is adjacent to a Scheduled Ancient Monument (SAM)? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a SAM.	The Allocation Area is located adjacent to a SAM, the Wood Hall Moated Site. As necessary, the policy will require that appropriate measures be taken to preserve the setting of this SAM.		
		Does the broad location fall within or it is adjacent to an Area of Archaeological Importance or a	There are several sites of archaeological interest within the Allocation Area. The site area is large enough to enable negative impacts on these sites		

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
		potential archaeological site? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of an Area of Archaeological Importance or a potential archaeological site.	to be minimised.		
19	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Do parts of the broad location cover or they are adjacent to a Green Corridor? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a Green Corridor.	No.		
		Is the broad location in or adjacent to areas of designated landscapes (AONB, Environmentally Sensitive Areas)?	The Allocated Area is not within or adjacent to areas of designated landscape.		
		Will the broad location development lead to coalescence of urban extensions with nearby villages?	The Allocated Area will not lead to coalescence of any villages with the urban extension.		
Economic					
20	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Is the broad location proposed for mixed-use development or employment?	The Allocated Area is proposed for mixed-use development accommodating employment areas.		
21	To revitalise town centres	Is the broad location proposed for mixed-use development or employment in town centres?	The Allocated Area is located at the edge of town, not providing immediate benefits to the vitality of the town centre.		
22	To encourage efficient patterns of movement in support of economic growth	Is the broad location proposed in a proximity to a public transport route or in a walkable/cyclable distance?	The Allocated Area is located in proximity to a public transport route. The Policy will also seek to deliver further sustainable travel opportunities.		

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
23	To encourage and accommodate both indigenous and inward investment	Will it increase employment land availability?	The Allocated Area is proposed for mixed-use development accommodating employment and other uses, which should stimulate investment flows.		
Summary Assessment					
<p>The Sustainability Appraisal of the broad location in September 2011 was based on the assumption that the existing Local Plan allocation CP01 would be retained. It therefore assessed the broad location as a potential extension of the land allocated under CP01. The June 2012 SA, is based on reallocating the Local Plan site, plus the preferred extended boundary to the west. Most of the assessment scores are the same, with variations evident for site specific constraints. The overall assessment for the site is generally positive, with a few neutral or mixed effects. The significantly negative effect is due to the site being a green field site. However, for growth on this scale there are no more sustainable options such as brown field sites.</p>					

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
Proposed amended policy CS3a for the new Broad Direction of Growth at Sudbury East					
Proposed Use - Mixed Use					
Social					
1	To improve the health of the population overall	Is it within 30 mins of a GP, dentist and hospital by public transport?	The Proposed Change does not define a boundary. It provides a policy to support the Broad Direction of Growth and, therefore, there is no change from the previous SA.		
		Will it lead to a loss of public open space or open access land?			
		Will it improve accessibility by Public Rights of Way?			
2	To maintain and improve levels of education and skills in the population overall	Is it within 30 mins of a school by public transport?			
		Is it within walkable / cyclable distances (800m and 2-5km)?			
4	To reduce poverty and social exclusion	Will the broad location be situated near or within LSOAs in the most deprived 20% to 40% in the country?			
5	To improve access to key services for all sectors of the population	Is it within 30 mins of the town centre by public transport?			
		Is it within walkable / cyclable distances (800m and 2-5km) to key services?			
		Is it within 30 mins of a supermarket / shopping centre by public transport?			
		Is it within walkable / cyclable distances (800m and 2-5km) to supermarkets / shopping centre?			
		Is the broad location proposed for mixed-use development with good accessibility to local facilities?		The Proposed Change does not define a boundary. It provides a policy to support the Broad Direction of Growth and, therefore, there is no change from the previous SA.	

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
6	To offer everybody the opportunity for rewarding and satisfying employment	Is the broad location proposed for employment or mixed use with employment included?			
7	To meet the housing requirements of the whole community	Is the broad location proposal over the relevant thresholds for the application of affordable housing policy? Babergh Local Plan policy HS08 specifies that sites which come forward for residential development in a settlement with a population of 3,000 or more and which are 0.5ha or more in size, capable of accommodating at least 15 dwellings, or on sites of similar size and capacity on which a renewal of planning permission is sought, the District Council will require up to 35% of dwellings to be provided in the form of affordable housing to meet identified local needs.			
8	To improve the quality of where people live and encourage community participation	Does the broad location have a good access to natural green space?			
Environmental					
9	To maintain and where possible improve water quality	Is the broad location proposed within a groundwater source protection zone?	The Proposed Change does not define a boundary. It provides a policy to support the Broad Direction of Growth and, therefore, there is no change from the previous SA.		
10	To maintain and where possible improve air quality	Is the broad location proposed within an Air Quality Management Area (AQMA)?			
11	To conserve soil resources and quality	Is the broad location proposed on Greenfield land?			

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
		Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3a)?			
		Will it lead to remediation of contaminated land?			
14	To reduce the effects of traffic on the environment	Does the broad location have good accessibility to local facilities (as assessed above)?			
15	To reduce emissions of greenhouse gases from energy consumption	Will the broad location proposal promote the incorporation of small-scale renewable in developments?			
16	To reduce vulnerability to climatic events	Does the broad location lie within the flood risk zones (2, 3a, 3b) identified in the SERA and have a proposed 'non-compatible' use or is located within 9m of a river?			
17	To conserve and enhance biodiversity and geodiversity	Is the broad location in proximity to a Special Protection Area (SPA), Special Area of Conservation (SAC) or broad location of Special Scientific Interest (SSSI)? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 2-4 km of a SPA, SAC or SSSI. Differentiation is made between European and national designations given a different level of protection granted to these sites.	The Proposed Change does not define a boundary. It provides a policy to support the Broad Direction of Growth and, therefore, there is no change from the previous SA.		
		Is the broad location in proximity to a County Wildlife Site, Local Nature Reserve or Ancient Woodland? Note:			

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
		For the purposes of this assessment, proximity will be taken to mean that the broad location is within 500m of a site.			
		Are BAP habitats known to be represented within the broad location?			
		Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS (Regionally Important Geological/Geomorphological Sites)? The broad location within 500m of a SSSI will be coded red and within 1km will be coded amber. The broad location adjacent to RIGS will be coded red and within 500m - amber.			
18	To conserve and where appropriate enhance areas of historical and archaeological importance	Are there any listed buildings within or adjacent to the broad location?	The Proposed Change does not define a boundary. It provides a policy to support the Broad Direction of Growth and, therefore, there is no change from the previous SA.		
		Is the broad location in or adjacent to a Conservation Area? Note: The broad locations located in a Conservation Area were coded red, those within 40 metres of a town Conservation Area or within 800m of a village Conservation Area (a PPG2 criteria) were coded orange and broad locations not in proximity to any Conservation Areas were coded green.			
		Is the broad location in or adjacent to a Historic Park and Garden? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a Historic Park and Garden.			

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
		Does the broad location contain or it is adjacent to a Scheduled Ancient Monument (SAM)? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a SAM.			
		Does the broad location fall within or it is adjacent to an Area of Archaeological Importance or a potential archaeological site? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of an Area of Archaeological Importance or a potential archaeological site.			
19	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Do parts of the broad location cover or they are adjacent to a Green Corridor? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a Green Corridor.	The Proposed Change does not define a boundary. It provides a policy to support the Broad Direction of Growth and, therefore, there is no change from the previous SA.		
		Is the broad location in or adjacent to areas of designated landscapes (AONB, Environmentally Sensitive Areas)?			
		Will the broad location development lead to coalescence of urban extensions with nearby villages?			
Economic					
20	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Is the broad location proposed for mixed-use development or employment?	The Proposed Change does not define a boundary. It provides a policy to support the Broad Direction of Growth and, therefore, there is no change from the previous SA.		

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
21	To revitalise town centres	Is the broad location proposed for mixed-use development or employment in town centres?			
22	To encourage efficient patterns of movement in support of economic growth	Is the broad location proposed in a proximity to a public transport route or in a walkable/cyclable distance?			
23	To encourage and accommodate both indigenous and inward investment	Will it increase employment land availability?	The Proposed Change does not define a boundary. It provides a policy to support the Broad Direction of Growth and, therefore, there is no change from the previous SA.		
Summary Assessment					
<p>The proposed change retains the policy objective of indicating land to the east of Sudbury and Great Cornard for a broad direction for growth for employment uses and approximately 500 new homes and land for employment uses. Due to the proposed timing of development in this location coming forward towards the end of the plan period, the site is not allocated with defined boundaries at this stage. The amended policy continues to refer to the broad location for growth, and gives some further guidance in respect of likely timing and the process for the more detailed stages of plan preparation in respect of developing clearer guidance for this site to be delivered later in the plan period. The proposed policy wording provides some broad parameters / considerations likely to be relevant to developing further guidance in a future DPD. This policy has been assessed for the sustainability appraisal; however, the scores do not vary from the original broad location assessment, as no further information of site definition etc is yet known. Therefore there are no implications of the proposed policy change on the sustainability appraisal</p>					

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
Proposed Amended Policy CS4 Strategic Growth area Allocation at Hadleigh					
Proposed Use - Mixed Use					
Social					
1	To improve the health of the population overall	Is it within 30 mins of a GP, dentist and hospital by public transport?	The allocated area is within 30 mins of a GP and dentist surgery by public transport		
		Will it lead to a loss of public open space or open access land?	The allocated area will not lead to loss of public open space or open access land.		
		Will it improve accessibility by Public Rights of Way?	The allocated area is adjacent to a public footpath.		
2	To maintain and improve levels of education and skills in the population overall	Is it within 30 mins of a school by public transport?	The allocated area is within 30 mins of a school by public transport.		
		Is it within walkable/cyclable distances (800m and 2-5km)?	It is within walkable / cyclable distances. There are two schools within 500m of the allocated area.		
4	To reduce poverty and social exclusion	Will the broad location be situated near or within LSOAs in the most deprived 20% to 40% in the country?	As the allocated area is not situated close to or within a deprived area, opportunities for regeneration are not likely.		
5	To improve access to key services for all sectors of the population	Is it within 30 mins of the town centre by public transport?	The allocated area is within 30 mins of the town centre by public transport.		
		Is it within walkable/cyclable distances (800m and 2-5km) to key services?	It is within cyclable distance but not walkable distance. The town centre is located approximately 1km from the centre of the allocated area.		
		Is it within 30 mins of a supermarket/ shopping centre by public transport?	The allocation area is within 30 mins of the town centre by public transport.		
		Is it within walkable/cyclable distances (800m and 2-5km) to supermarkets / shopping centre?	It is within cyclable distance but not walkable distance.		

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
		Is the broad location proposed for mixed-use development with good accessibility to local facilities?	The area is proposed for mixed use development and will have good accessibility to local facilities.		
6	To offer everybody the opportunity for rewarding and satisfying employment	Is the broad location proposed for employment or mixed use with employment included?	The area is proposed for mixed use development with employment included.		
7	To meet the housing requirements of the whole community	Is the broad location proposal over the relevant thresholds for the application of affordable housing policy? Babergh Local Plan policy HS08 specifies that sites which come forward for residential development in a settlement with a population of 3,000 or more and which are 0.5ha or more in size, capable of accommodating at least 15 dwellings, or on sites of similar size and capacity on which a renewal of planning permission is sought, the District Council will require up to 35% of dwellings to be provided in the form of affordable housing to meet identified local needs.	The allocation area would be capable of accommodating larger sites and provision of affordable housing.		
8	To improve the quality of where people live and encourage community participation	Does the broad location have a good access to natural green space?	Yes. Opportunities exist to access areas of natural green space.		
Environmental					
9	To maintain and where possible improve water quality	Is the broad location proposed within a groundwater source protection zone?	The allocation area is not situated within a groundwater source protection zone.		
10	To maintain and where possible improve air quality	Is the broad location proposed within an Air Quality Management Area (AQMA)?	The allocation area is not within an AQMA		

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
11	To conserve soil resources and quality	Is the broad location proposed on Greenfield land?	The allocation is proposed on Greenfield Land		
		Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3a)?	The allocation is located on Grade 3 Agricultural Land.		
		Will it lead to remediation of contaminated land?	There are no potentially contaminated sites within the allocation area.		
14	To reduce the effects of traffic on the environment	Does the broad location have good accessibility to local facilities (as assessed above)?	The Allocation Area can be accessed by public transport, therefore, it should help minimise the need for travel and reliance on the private car.		
15	To reduce emissions of greenhouse gases from energy consumption	Will the broad location proposal promote the incorporation of small-scale renewable in developments?	The proposal is large enough to allow opportunities for incorporating small scale renewable development proposals.		
16	To reduce vulnerability to climatic events	Does the broad location lie within the flood risk zones (2, 3a, 3b) identified in the SERA and have a proposed 'non-compatible' use or is located within 9m of a river?	The allocation area is not situated within Flood Zones 2, 3a or 3b or in proximity to a water course.		
17	To conserve and enhance biodiversity and geodiversity	Is the broad location in proximity to a Special Protection Area (SPA), Special Area of Conservation (SAC) or broad location of Special Scientific Interest (SSSI)? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 2-4 km of a SPA, SAC or SSSI. Differentiation is made between European & national designations given a different level of protection granted to these sites.	The allocation area is situated approximately 1km west of the Hintlesham Woods SSSI.		
		Is the broad location in proximity to a County Wildlife Site, Local Nature Reserve or Ancient Woodland? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 500m of a site.	At its closest point, the allocation area is approx 600m away from the start of the Hadleigh Railway Walk LNR.		

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
		Are BAP habitats known to be represented within the broad location?	There are no known BAP habitats represented within the allocated area.		
		Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS (Regionally Important Geological/Geomorphological Sites)? The broad location within 500m of a SSSI will be coded red and within 1km will be coded amber. The broad location adjacent to RIGS will be coded red and within 500m - amber.	There are no geological SSSIs or RIGS in proximity of this broad location.		
18	To conserve and where appropriate enhance areas of historical and archaeological importance	Are there any listed buildings within or adjacent to the broad location?	There are no listed buildings within or adjacent to the allocated area.		
		Is the broad location in or adjacent to a Conservation Area? Note: The broad locations located in a Conservation Area were coded red, those within 40m of a town Conservation Area or within 800m of a village Conservation Area (a PPG2 criteria) were coded orange and broad locations not in proximity to any Conservation Areas were coded green.	The nearest Conservation Area is located approximately 250m west of the allocation area. However, this is the Conservation Area within the town, which is not likely to be affected by new development at the edge of the town.		
		Is the broad location in or adjacent to a Historic Park & Garden? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a Historic Park & Garden.	The allocation area is not situated in proximity to a Historic Park and Garden.		
		Does the broad location contain or it is adjacent to a Scheduled Ancient Monument (SAM)? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a SAM.	The nearest SAM is Toppesfield Bridge, which is located approximately 1km west of the site.		

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
		Does the broad location fall within or is it adjacent to an Area of Archaeological Importance or a potential archaeological site? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of an Area of Arch' Importance or a potential archaeological site.	The allocation area is adjacent to a site of archaeological interest. However, this is only along part of the sites northern border.		
19	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Do parts of the broad location cover or are they adjacent to a Green Corridor? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a Green Corridor.	No		
		Is the broad location in or adjacent to areas of designated landscapes (AONB, Environmentally Sensitive Areas)?	The allocation site does overlap with an area designated as a SLA or AONB.		
		Will the broad location development lead to coalescence of urban extensions with nearby villages?	Development of the allocated site will not lead to coalescence of any villages with the urban extension.		
Economic					
20	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Is the broad location proposed for mixed-use development or employment?	The allocation area is proposed for mixed-use development accommodating employment areas.		
21	To revitalise town centres	Is the broad location proposed for mixed-use development or employment in town centres?	The allocation is located at the edge of the town, not providing immediate benefits to the vitality of the town centre.		
22	To encourage efficient patterns of movement in support of economic growth	Is the broad location proposed in a proximity to a public transport route or in a walkable/cyclable distance?	The allocated area is located in proximity to a public transport route. The Policy will also seek to deliver further sustainable travel opportunities.		

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
23	To encourage and accommodate both indigenous and inward investment	Will it increase employment land availability?	The Allocated Area is proposed for mixed-use development accommodating employment and other uses, which should stimulate investment flows.		
Summary Assessment					
<p>The broad location assessed, abuts Hadleigh settlement boundary. Development of sites within it would lead to the loss of greenfield agricultural land. On the positive side this broad location benefits from the services and facilities offered within Hadleigh and it has the advantage of being located in close proximity to public transport routes and Public Rights of Way. The broad location is not at flood risk. Proposed mixed use development should help minimise the need for travel. The broad location has been identified to be situated in proximity to the SSSI and LNR. It is also adjacent to an Area of Archaeological Importance and a Special Landscape Area and it is situated in a relative proximity to a village Conservation Area. These identified constraints do not represent 'show stoppers' for the broad location's development and will be carefully considered through the master planning process. The boundary definition reflects the development requirements and the landscape and topography. Sufficient land is included to ensure the design layout can adequately address landscape constraints and provide good connections and green infrastructure links. No further constraints are evident from the assessment of the boundary definition proposed for this broad location.</p>					

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
Proposed Amended Policy CS5 Strategic Growth area Allocation at Ipswich Fringe					
Proposed Use - Mixed Use					
Social					
1	To improve the health of the population overall	Is it within 30 mins of a GP, dentist and hospital by public transport?	Medical services could be accessed by public transport within 30 mins of the site.		
		Will it lead to a loss of public open space or open access land?	There will be no loss of public open space or open access land.		
		Will it improve accessibility by Public Rights of Way?	The allocated area contains an existing PRow, Another PRow and a Cycle Route are nearby.		
2	To maintain and improve levels of education and skills in the population overall	Is it within 30 mins of a school by public transport?	The allocation area is within 30 mins of a school by public transport.		
		Is it within walkable / cyclable distances (800m and 2-5km)?	Yes, there are various potential options although enhancements to access and route safety will need to be considered.		
4	To reduce poverty and social exclusion	Will the broad location be situated near or within LSOAs in the most deprived 20% to 40% in the country?	As the allocation area is not situated close to or within a deprived area, opportunities for regeneration are not likely.		
5	To improve access to key services for all sectors of the population	Is it within 30 mins of the town centre by public transport?	The allocation area is within 30 mins of the town centre by public transport.		
		Is it within walkable / cyclable distances (800m and 2-5km) to key services?	It is within cyclable distance but not within walkable distance. The town centre is approximately 1.8km west of the area.		
		Is it within 30 mins of a supermarket / shopping centre by public transport?	The allocation area is within 30 mins of a shop / supermarket by public transport.		
		Is it within walkable / cyclable distances (800m and 2-5km) to supermarkets / shopping centre?	Part of the allocation area falls within walking distance. The whole area is within cyclable distance.		

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
		Is the broad location proposed for mixed-use development with good accessibility to local facilities?	The allocated area is proposed for mixed-use development and the policy actively promotes good links to shops and services.		
6	To offer everybody the opportunity for rewarding and satisfying employment	Is the broad location proposed for employment or mixed use with employment included?	The allocation area is proposed for mixed use development, including employment use.		
7	To meet the housing requirements of the whole community	Is the broad location proposal over the relevant thresholds for the application of affordable housing policy? Babergh Local Plan policy HS08 specifies that sites which come forward for residential development in a settlement with a population of 3,000 or more and which are 0.5ha or more in size, capable of accommodating at least 15 dwellings, or on sites of similar size and capacity on which a renewal of planning permission is sought, the District Council will require up to 35% of dwellings to be provided in the form of affordable housing to meet identified local needs.	The allocation area would be capable of accommodating larger sites and provision of affordable housing.		
8	To improve the quality of where people live & encourage community participation	Does the broad location have a good access to natural green space?	Yes, the broad location does have a good access to areas of natural green space		
Environmental					
9	To maintain and where possible improve water quality	Is the broad location proposed within a groundwater source protection zone?	The allocation area falls within a groundwater source protection zone 2 (Outer Zone).		
10	To maintain and where possible improve air quality	Is the broad location proposed within an Air Quality Management Area (AQMA)?	The allocation area is not within a AQMA.		

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
11	To conserve soil resources and quality	Is the broad location proposed on Greenfield land?	The allocation area contains a mix of Greenfield and Brownfield land.		
		Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3a)?	The allocation area is situated almost entirely on Grade 2 agricultural land (with some Grade 3)		
		Will it lead to remediation of contaminated land?	A small pocket of land has been identified as one of potential contamination. Development may provide opportunities for remediation.		
14	To reduce the effects of traffic on the environment	Does the broad location have good accessibility to local facilities (as assessed above)?	The allocation area can / would be accessible by public transport, therefore, it should help minimise the need for travel and reliance on the private car.		
15	To reduce emissions of greenhouse gases from energy consumption	Will the broad location proposal promote the incorporation of small-scale renewable in developments?	The site is large enough to allow for incorporation of small scale renewable developments.		
16	To reduce vulnerability to climatic events	Does the broad location lie within the flood risk zones (2, 3a, 3b) identified in the SERA and have a proposed 'non-compatible' use or is located within 9m of a river?	The allocation area is not within a Flood Risk Zone.		
17	To conserve and enhance biodiversity and geodiversity	Is the broad location in proximity to a Special Protection Area (SPA), Special Area of Conservation (SAC) or broad location of Special Scientific Interest (SSSI)? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 2-4 km of a SPA, SAC or SSSI. Differentiation is made between European and national designations given a different level of protection granted to these sites.	The site is situated approximately 2km away from a SSSI, and the nearest SPA designation (the Stour & Orwell Estuary) is 2.8km south-east of the site. The HRA has assessed the implications and mitigation requirements of this in more detail.		

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
		Is the broad location in proximity to a County Wildlife Site, Local Nature Reserve or Ancient Woodland? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 500m of a site.	The allocation area is not located in proximity to a CWS, LNR or Ancient Woodland.		
		Are BAP habitats known to be represented within the broad location?	There are no BAP habitats present on site.		
		Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS (Regionally Important Geological / Geomorphological Sites)? The broad location within 500m of a SSSI will be coded red and within 1km will be coded amber. The broad location adjacent to RIGS will be coded red and within 500m - amber.	The allocation of this site would not lead to a loss of or damage to a geological SSSIs or RIGs		
18	To conserve and where appropriate enhance areas of historical and archaeological importance	Are there any listed buildings within or adjacent to the broad location?	Poplar Farm, which is located centrally within the allocated area, is a Grade 2 listed building.		
		Is the broad location in or adjacent to a Conservation Area? Note: The broad locations located in a Conservation Area were coded red, those within 40m of a town Conservation Area or within 800m of a village Conservation Area (a PPG2 criteria) were coded orange and broad locations not in proximity to any Conservation Areas were coded green.	The allocation area is not in or adjacent to a Conservation Area.		

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
		Is the broad location in or adjacent to a Historic Park and Garden? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a Historic Park and Garden.	The allocated area is not in or adjacent to a Historic Park and Garden. At its closest point, Chantry Park (which is in Ipswich Borough) is approximately 600m north-east of the site boundary.		
		Does the broad location contain or it is adjacent to a Scheduled Ancient Monument (SAM)? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a SAM.	The allocation area does not contain and is not located in proximity to a SAM.		
		Does the broad location fall within or it is adjacent to an Area of Archaeological Importance or a potential arch' site? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of an Area of Arch' Importance or a potential archaeological site.	There are several sites of archaeological interest within the allocation area.		
19	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Do parts of the broad location cover or they are adjacent to a Green Corridor? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a Green Corridor.	The Allocated Area does not cover and is not adjacent to a Green Corridor.		
		Is the broad location in or adjacent to areas of designated landscapes (AONB, Environmentally Sensitive Areas)?	The allocation area is partially within a Special Landscape Area.		
		Will the broad location development lead to coalescence of urban extensions with nearby villages?	Development of the allocated area will not lead to coalescence of any villages with the urban extension.		

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
Economic					
20	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Is the broad location proposed for mixed-use development or employment?	The allocation area is proposed for mixed-use development accommodating employment uses.		
21	To revitalise town centres	Is the broad location proposed for mixed-use development or employment in town centres?	The Allocation Area is located at the edge of town, not providing immediate benefits to the vitality of the town centre.		
22	To encourage efficient patterns of movement in support of economic growth	Is the broad location proposed in a proximity to a public transport route or in a walkable/cyclable distance?	The Allocation Area is located in proximity to a public transport route. The Policy will also seek to deliver further sustainable travel opportunities.		
23	To encourage and accommodate both indigenous and inward investment	Will it increase employment land availability?	The Allocation Area is proposed for mixed-use development accommodating employment and other uses, which should stimulate investment flows.		
Summary Assessment					
<p>The SA Assessment identifies a few negative impacts, some neutral impacts and a number of overall positive effects. The proximity of the SPA has implications which have been assessed through the HRA, the implications of which will be reflected in the implementation and delivery. Development of the site will need to be designed and managed to reflect the HRA and also to ensure that adequate safe access to services, particularly to primary schools, is provided. Various options exist to achieve this, which are reflected in policy CS5.</p>					

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
Proposed New Policy CS5a Sproughton Sugar Beet Site (including the reallocation of EM04 (Adopted Local Plan 2006))					
Proposed Use - Employment					
Social					
1	To improve the health of the population overall	Is it within 30 mins of a GP, dentist and hospital by public transport?	Not relevant. The site is allocated for employment use.	No score applicable for Sproughton Sugar Beet site as SA was not carried out as a broad location but as part of Policy CS2 as a strategic employment site. N/A	
		Will it lead to a loss of public open space or open access land?	There will be no loss of public open space o open access land.	N/A	
		Will it improve accessibility by Public Rights of Way?	An adjacent PRoW will improve accessibility to the site.	N/A	
2	To maintain and improve levels of education and skills in the population overall	Is it within 30 mins of a school by public transport?	Not relevant. New Local Plan (Policy CS5a) allocates this site for employment use.	N/A	
		Is it within walkable/cyclable distances (800m and 2-5km)?	Not relevant. New Local Plan (Policy CS5a) allocates this site for employment use.	N/A	
4	To reduce poverty and social exclusion	Will the broad location be situated near or within LSOAs in the most deprived 20% to 40% in the country?	As the Allocation Area is not situated close to or within a deprived area, the implications of regeneration are not likely to impact on deprivation levels.	N/A	

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
5	To improve access to key services for all sectors of the population	Is it within 30 mins of the town centre by public transport?	Not relevant.	N/A	
		Is it within walkable/cyclable distances (800m and 2-5km) to key services?	Not relevant.	N/A	
		Is it within 30 mins of a supermarket / shopping centre by public transport?	Not relevant.	N/A	
		Is it within walkable/cyclable distances (800m and 2-5km) to supermarkets / shopping centre?	Not relevant.	N/A	
		Is the broad location proposed for mixed-use development with good accessibility to local facilities?	Not relevant. New Local Plan (Policy CS5a) allocates this site for employment use.	N/A	
6	To offer everybody the opportunity for rewarding and satisfying employment	Is the broad location proposed for employment or mixed use with employment included?	The site is proposed for employment use.	N/A	
7	To meet the housing requirements of the whole community	Is the broad location proposal over the relevant thresholds for the application of affordable housing policy? Babergh Local Plan policy HS08 specifies that sites which come forward for residential development in a settlement with a population of 3,000 or more and which are 0.5 hectares or more in size, capable of accommodating at least 15 dwellings, or on sites of similar size and capacity on which a renewal of planning permission is sought, the District Council will require up to 35% of dwellings to be provided in the form of affordable housing to meet identified local needs.	Not relevant. New Local Plan (Policy CS5a) allocates this site for employment use.	N/A	
8	To improve the quality of where people live and encourage community participation	Does the broad location have a good access to natural green space?	Not relevant.	N/A	

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
Environmental					
9	To maintain and where possible improve water quality	Is the broad location proposed within a groundwater source protection zone?	The former Sugar Beet site is situated within a groundwater source protection zone 2 (Outer Zone) and is adjacent to an Inner Zone.	N/A	
10	To maintain and where possible improve air quality	Is the broad location proposed within an Air Quality Management Area (AQMA)?	The Allocation Area is not within an AQMA.	N/A	
11	To conserve soil resources and quality	Is the broad location proposed on Greenfield land?	The former Sugar Beet site is Brownfield land.	N/A	
		Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3a)?	The former Sugar Beet site comprises a mix of Non-Agricultural, Grade 3 and Urban Agricultural Land Classifications.	N/A	
		Will it lead to remediation of contaminated land?	Redevelopment may provide opportunities for remediation of contaminated land associated with the sites former use.	N/A	
14	To reduce the effects of traffic on the environment	Does the broad location have good accessibility to local facilities (as assessed above)?	The site is well located in relation to the A14 Corridor, with obvious benefits for employment use.	N/A	
15	To reduce emissions of greenhouse gases from energy consumption	Will the broad location proposal promote the incorporation of small-scale renewable in developments?	The site is large enough to provide opportunities for incorporating small scale renewable energy proposals.	N/A	
16	To reduce vulnerability to climatic events	Does the broad location lie within the flood risk zones (2, 3a, 3b) identified in the SERA and have a proposed 'non-compatible' use or is located within 9m of a river?	The former Sugar Beet Site lies adjacent to an area designated as Flood Zone 2 and Floods Zone 3.	N/A	
17	To conserve and enhance biodiversity and geodiversity	Is the broad location in proximity to a Special Protection Area (SPA), Special Area of Conservation (SAC) or broad location of Special Scientific Interest (SSSI)? Note: For the purposes of this assessment, proximity will be taken to	The former Sugar Beet site is just within the 4km limit of Bobbitshole, Belstead (a SSSI) and the Orwell Estuary (a SSSI and SPA).	N/A	

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
		mean that the broad location is within 2-4 km of a SPA, SAC or SSSI. Differentiation is made between European and national designations given a different level of protection granted to these sites.			
		Is the broad location in proximity to a County Wildlife Site, Local Nature Reserve or Ancient Woodland? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 500m of a site.	There are two CWS and one area of Ancient Woodland in the local area but all are more than 500 metres away from the site boundary.	N/A	
		Are BAP habitats known to be represented within the broad location?	There are no BAP habitats on the site.	N/A	
		Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS (Regionally Important Geological / Geomorphological Sites)? The broad location within 500m of a SSSI will be coded red and within 1km will be coded amber. The broad location adjacent to RIGS will be coded red and within 500m - amber.	There are no geological SSSI's or RIGS within the Allocated Area.	N/A	
18	To conserve and where appropriate enhance areas of historical and archaeological importance	Are there any listed buildings within or adjacent to the broad location?	There are no listed buildings within or adjacent to the site.	N/A	
		Is the broad location in or adjacent to a Conservation Area? Note: The broad locations located in a Conservation Area were coded red, those within 40 metres of a town Conservation Area or within 800m of a village Conservation Area (a PPG2 criterion) were coded orange and broad locations not in proximity to any Conservation Areas were coded green.	The former Sugar Beet site is not within or adjacent to a Conservation Area.	N/A	

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
		Is the broad location in or adjacent to a Historic Park and Garden? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a Historic Park and Garden.	The former Sugar Beet site is not situated in proximity to a Historic Park or Garden.	N/A	
		Does the broad location contain or it is adjacent to a Scheduled Ancient Monument (SAM)? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a SAM.	The former Sugar Beet site does not contain and is not adjacent to any SAM.	N/A	
		Does the broad location fall within or it is adjacent to an Area of Archaeological Importance or a potential archaeological site? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of an Area of Archaeological Importance or a potential archaeological site.	The former Sugar Beet site contains a small number of scattered sites of archaeological interest.	N/A	
19	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Do parts of the broad location cover or are they adjacent to a Green Corridor? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a Green Corridor.	No.	N/A	
		Is the broad location in or adjacent to areas of designated landscapes (AONB, Environmentally Sensitive Areas)?	The former Sugar Beet site is not located in or adjacent to areas of designated landscape.	N/A	
		Will the broad location development lead to coalescence of urban extensions with nearby villages?	Re-development of the former Sugar Beet site will not lead to coalescence of any villages with the urban extension.	N/A	

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
Economic					
20	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Is the broad location proposed for mixed-use development or employment?	The Former Sugar Beet site is proposed for employment related uses and is well located along the A14 Corridor.	N/A	
21	To revitalise town centres	Is the broad location proposed for mixed-use development or employment in town centres?	The former Sugar Beet site is located on the Ipswich Fringe, not providing immediate benefits to the vitality of the town centre.	N/A	
22	To encourage efficient patterns of movement in support of economic growth	Is the broad location proposed in a proximity to a public transport route or in a walkable/cyclable distance?	The former Sugar Beet site lies adjacent to an area that is currently served by public transport.	N/A	
23	To encourage and accommodate both indigenous and inward investment	Will it increase employment land availability?	The former Sugar Beet site is allocated for employment use(s), so will have positive benefits for employment and should encourage both indigenous and inward investment.	N/A	
Summary Assessment					
<p>The SA Assessment has identified a number of mixed effects. As an employment only allocation the site has a number of neutral or non-relevant impacts, with a number of positives identified under the economic objectives. The reallocation of this site will contribute positively to the employment provision and presents an opportunity to address site specific issues on the former Sugar Beet site.</p>					

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
Proposed New Policy CS5b Wherstead Strategic Employment Allocation					
Proposed Use - Employment					
Social					
1	To improve the health of the population overall	Is it within 30 mins of a GP, dentist and hospital by public transport?	Not relevant. The site is allocated for employment use/	N/A	
		Will it lead to a loss of public open space or open access land?	There will be no loss of public open space or open access land..	N/A	
		Will it improve accessibility by Public Rights of Way?	PRoW through and adjacent to the site will improve accessibility.	N/A	
2	To maintain and improve levels of education and skills in the population overall	Is it within 30 mins of a school by public transport?	Not relevant. New Local Plan (Policy CS5b) allocates this site for employment use.	N/A	
		Is it within walkable/cyclable distances (800m and 2-5km)?	Not relevant. New Local Plan (Policy CS5b) allocates this site for employment use.	N/A	
4	To reduce poverty and social exclusion	Will the broad location be situated near or within LSOAs in the most deprived 20% to 40% in the country?	As the Allocation Area is not situated close to or within a deprived area, the implications of regeneration are not likely to impact on deprivation levels.	N/A	
5	To improve access to key services for all sectors of the population	Is it within 30 mins of the town centre by public transport?	Not relevant	N/A	
		Is it within walkable/cyclable distances (800m and 2-5km) to key services?	Not relevant	N/A	
		Is it within 30 mins of a supermarket / shopping centre by public transport?	Not relevant	N/A	
		Is it within walkable/cyclable distances (800m and 2-5km) to supermarkets / shopping centre?	Not relevant	N/A	

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
		Is the broad location proposed for mixed-use development with good accessibility to local facilities?	Not relevant. New Local Plan Policy CS5b allocates this site for employment use.	N/A	
6	To offer everybody the opportunity for rewarding and satisfying employment	Is the broad location proposed for employment or mixed use with employment included?	The site is proposed for employment use.	N/A	
7	To meet the housing requirements of the whole community	Is the broad location proposal over the relevant thresholds for the application of affordable housing policy? Babergh Local Plan policy HS08 specifies that sites which come forward for residential development in a settlement with a population of 3,000 or more and which are 0.5 hectares or more in size, capable of accommodating at least 15 dwellings, or on sites of similar size and capacity on which a renewal of planning permission is sought, the District Council will require up to 35% of dwellings to be provided in the form of affordable housing to meet identified local needs.	Not relevant. New Local Plan Policy CS5b allocates this site for employment use.	N/A	
8	To improve the quality of where people live and encourage community participation	Does the broad location have a good access to natural green space?	Not relevant.	N/A	
Environmental					
9	To maintain and where possible improve water quality	Is the broad location proposed within a groundwater source protection zone?	The Allocated Area is situated within an Outer Zone (Zone 2) groundwater source protection zone.	N/A	
10	To maintain and where possible improve air quality	Is the broad location proposed within an Air Quality Management Area (AQMA)?	The Allocated Area is not within an AQMA	N/A	
11	To conserve soil resources and quality	Is the broad location proposed on Greenfield land?	The site is divided approximately in half – commercial premises and greenfield site.	N/A	

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
		Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3a)?	The site is located on predominantly grade 2, with some grade 3 agricultural land. (Part of the site has already been developed)	N/A	
		Will it lead to remediation of contaminated land?	There are no areas of contaminated land identified within the Allocated Area boundary.	N/A	
14	To reduce the effects of traffic on the environment	Does the broad location have good accessibility to local facilities (as assessed above)?	The Wherstead site can be accessed by public transport, therefore it should help minimise reliance on private cars.	N/A	
15	To reduce emissions of greenhouse gases from energy consumption	Will the broad location proposal promote the incorporation of small-scale renewable in developments?	The site could provide opportunities for incorporating small scale renewable energy proposals.	N/A	
16	To reduce vulnerability to climatic events	Does the broad location lie within the flood risk zones (2, 3a, 3b) identified in the SERA and have a proposed 'non-compatible' use or is located within 9m of a river?	The Allocated Area does not lie within any Flood Zones and is not located within 9m of a river.	N/A	
17	To conserve and enhance biodiversity and geodiversity	Is the broad location in proximity to a Special Protection Area (SPA), Special Area of Conservation (SAC) or broad location of Special Scientific Interest (SSSI)? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 2-4 km of a SPA, SAC or SSSI. Differentiation is made between European and national designations given a different level of protection granted to these sites.	The Allocated Area is within 2km of Bobbitshole, Belstead (a SSSI) and the Orwell Estuary (a SSSI and SPA).	N/A	
		Is the broad location in proximity to a County Wildlife Site, Local Nature Reserve or Ancient Woodland? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 500m of a site.	The Allocated Area is within 500m of a CWS, LNR or area of Ancient Woodland.	N/A	

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
		Are BAP habitats known to be represented within the broad location?	Unknown at this stage.	N/A	?
		Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS (Regionally Important Geological / Geomorphological Sites)? The broad location within 500m of a SSSI will be coded red and within 1km will be coded amber. The broad location adjacent to RIGS will be coded red and within 500m - amber.	There are no geological SSSIs or RIGS with the Allocated Area.	N/A	
18	To conserve and where appropriate enhance areas of historical and archaeological importance	Are there any listed buildings within or adjacent to the broad location?	The Allocated Site contains three Grade 2 Listed Buildings. There are a number of other Grade 2 properties adjacent to the south	N/A	
		Is the broad location in or adjacent to a Conservation Area? Note: The broad locations located in a Conservation Area were coded red, those within 40 metres of a town Conservation Area or within 800m of a village Conservation Area (a PPG2 criteria) were coded orange and broad locations not in proximity to any Conservation Areas were coded green.	Wherstead Park is not within or adjacent to a Conservation Area.	N/A	
		Is the broad location in or adjacent to a Historic Park and Garden? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a Historic Park and Garden.	Wherstead Park is not within or adjacent to a Historic Park or Garden.	N/A	
		Does the broad location contain or it is adjacent to a Scheduled Ancient Monument (SAM)? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a SAM.	The Allocated Area does not contain and is not adjacent to a SAM.	N/A	

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
		Does the broad location fall within or is it adjacent to an Area of Archaeological Importance or a potential archaeological site? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of an Area of Archaeological Importance or a potential archaeological site.	The Allocated Area contains a number of sites of archaeological interest.	N/A	
19	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Do parts of the broad location cover or are they adjacent to a Green Corridor? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a Green Corridor.	No.	N/A	
		Is the broad location in or adjacent to areas of designated landscapes (AONB, Environmentally Sensitive Areas)?	The eastern half of the site lies within the Suffolk Coast & Heaths AONB. The policy recognises this.	N/A	
		Will the broad location development lead to coalescence of urban extensions with nearby villages?	Any redevelopment of the site would not lead to coalescence of any villages with the urban extension.	N/A	
Economic					
20	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Is the broad location proposed for mixed-use development or employment?	The site is proposed for employment related uses and Is well located adjacent to the A14 Corridor.	N/A	
21	To revitalise town centres	Is the broad location proposed for mixed-use development or employment in town centres?	Wherstead Park is located on the Ipswich Fringe, not providing immediate benefits to the vitality of the town centre.	N/A	
22	To encourage efficient patterns of movement in support of economic growth	Is the broad location proposed in a proximity to a public transport route or in a walkable/cyclable distance?	Wherstead Park lies adjacent to an area that is currently served by public transport.	N/A	

SA Objective			Findings	Assessment Score Sept 2011	Assessment Score June 2012
23	To encourage and accommodate both indigenous and inward investment	Will it increase employment land availability?	The Wherstead Park site is allocated for employment use(s), so will have positive benefits for employment and should encourage both indigenous and inward investment.	N/A	
Summary Assessment					
<p>The assessment of this site is mostly a combination of positive effects with a number of neutral effects. This is largely due to it being proposed for employment uses only, which results in a number of the objectives either not being relevant or having no effect. The opportunities associated with the site are unique and relate only to this location and contribute positively to the strategic employment needs of the district.</p>					

SA Objective		Indicator	Findings	Assessment Score Sept 2011	Assessment Score June 2012
Proposed New Policy CS6a Brantham Regeneration Area (including the reallocation of EM06 (Adopted Local Plan 2006))					
Proposed Use - Employment / Mixed Use					
Social					
1	To improve the health of the population overall	Is it within 30 mins of a GP, dentist and hospital by public transport?	It is within 30 mins of a GP. The nearest GP surgery is in neighbouring Manningtree, approx. 3km from the site.-	No score applicable for Brantham. SA was not carried out as a broad location but as part of policy CS6 (Core & Hinterland Villages. N/A	
		Will it lead to a loss of public open space or open access land?	No. The new Local Plan policy seeks to provide new areas of public open space.	N/A	
		Will it improve accessibility by Public Rights of Way?	An existing PRoW runs along the northern boundary. The new policy seeks to enhance walking / cycle links between the site and the village as part of any future redevelopment proposal.	N/A	
2	To maintain and improve levels of education and skills in the population overall	Is it within 30 mins of a school by public transport?	There are schools in Brantham and nearby Manningtree.	N/A	
		Is it within walkable/cyclable distances (800m and 2-5km)?	Some schools are within cyclable distance.	N/A	
4	To reduce poverty and social exclusion	Will the broad location be situated near or within LSOAs in the most deprived 20% to 40% in the country?	As the Allocation Area is not situated close to / within a deprived area, opportunities for regeneration are not likely.	N/A	
5	To improve access to key services for all sectors of the population	Is it within 30 mins of the town centre by public transport?	Local services in Brantham & Manningtree (Tendring) would be accessible by public transport within 30 mins.	N/A	

SA Objective		Indicator	Findings	Assessment Score Sept 2011	Assessment Score June 2012
		Is it within walkable / cyclable distances (800m and 2-5km) to key services?	The site is within cyclable distance of key services.	N/A	
		Is it within 30 mins of a supermarket/ shopping centre by public transport?	The site is within 30 mins of a supermarket.	N/A	
		Is it within walkable / cyclable distances (800m and 2-5km) to supermarket / shopping centre?	The site is within cyclable distance of supermarket.	N/A	
		Is the broad location proposed for mixed-use development with good accessibility to local facilities?	Reasonable access to most facilities. Community infrastructure needs will be reviewed when more details of the proposed level of development comes forward, to ensure adequate access from any residential land provided.	N/A	
6	To offer everybody the opportunity for rewarding and satisfying employment	Is the broad location proposed for employment or mixed use with employment included?	The Regeneration area is proposed for mixed-use development, including employment use.	N/A	
7	To meet the housing requirements of the whole community	Is the broad location proposal over the relevant thresholds for the application of affordable housing policy? Babergh Local Plan policy HS08 specifies that sites which come forward for residential development in a settlement with a population of 3,000 or more and which are 0.5ha or more in size, capable of accommodating at least 15 dwellings, or on sites of similar size and capacity on which a renewal of planning permission is sought, the District Council will require up to 35% of dwellings to be provided in the form of affordable housing to meet identified local needs.	Although the new local plan policy includes some allowance for an appropriate level of enabling residential development it is not possible at this stage to quantify the numbers involved. That said, any new housing development will need to take into account relevant policies which address (affordable) housing need.	N/A	
8	To improve the quality of where people live and encourage community participation	Does the broad location have a good access to natural green space?	The Stour Estuary footpath would be accessible from the site. The Policy will also require provision of public open space.	N/A	

SA Objective		Indicator	Findings	Assessment Score Sept 2011	Assessment Score June 2012
Environmental					
9	To maintain and where possible improve water quality	Is the broad location proposed within a groundwater source protection zone?	A part of the site, south of the railway line, falls within Outer Zone (zone 2). However, the new Local Plan policy states that the land south of the railway line is expected to be subject to minimal or no new development.	N/A	
10	To maintain and where possible improve air quality	Is the broad location proposed within an Air Quality Management Area (AQMA)?	The Allocation Area is not within an AQMA.	N/A	
11	To conserve soil resources and quality	Is the broad location proposed on Greenfield land?	No	N/A	
		Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 & 3a)?	The site comprises a mix of mainly non agricultural land uses.	N/A	
		Will it lead to remediation of contaminated land?	Opportunities exist for the remediation of contaminated land associated with the sites former use.	N/A	
14	To reduce the effects of traffic on the environment	Does the broad location have good accessibility to local facilities (as assessed above)?	Reasonable access to most facilities. Community infrastructure needs will be reviewed when more details of the proposed level of development comes forward, to ensure adequate access from any residential land provided.	N/A	
15	To reduce emissions of greenhouse gases from energy consumption	Will the broad location proposal promote the incorporation of small-scale renewable in developments?	The site is large enough to provide opportunities for incorporating small scale renewable energy proposals.	N/A	
16	To reduce vulnerability to climatic events	Does the broad location lie within the flood risk zones (2, 3a, 3b) identified in the SERA and have a proposed 'non-compatible' use or is located within 9m of a river?	The Allocation Area lies almost entirely within Flood Zones 2 & 3 and is located adjacent to the upper reaches of the Stour Estuary.	N/A	

SA Objective		Indicator	Findings	Assessment Score Sept 2011	Assessment Score June 2012
17	To conserve and enhance biodiversity and geodiversity	Is the broad location in proximity to a Special Protection Area (SPA), Special Area of Conservation (SAC) or broad location of Special Scientific Interest (SSSI)? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 2-4km of a SPA, SAC or SSSI. Differentiation is made between European and national designations given a different level of protection granted to these sites.	The Allocated Area lies adjacent to the Stour & Orwell SPA and the Stour Estuary SSSI.	N/A	
		Is the broad location in proximity to a County Wildlife Site, Local Nature Reserve or Ancient Woodland? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 500m of a site.	There are no CWS, LNRs or areas of Ancient Woodland in proximity to the allocated area.	N/A	
		Are BAP habitats known to be represented within the broad location?	The adjacent Stour Estuary area contains a number of BAP habitats..	N/A	
		Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS (Regionally Important Geological / Geomorphological Sites)? The broad location within 500m of a SSSI will be coded red and within 1km will be coded amber. The broad location adjacent to RIGS will be coded red and within 500m - amber.	There are no geological SSSI's or RIGS within the Allocated Area.	N/A	
18	To conserve and where appropriate enhance areas of historical and archaeological importance	Are there any listed buildings within or adjacent to the broad location?	The (old) Cattawade Bridge and Crown Public House (both Grade 2) are located approx. 100m west of the Allocation Area.	N/A	
		Is the broad location in or adjacent to a Conservation Area? Note: The broad locations located in a Conservation Area	The Allocation Area is not within or adjacent to a Conservation Area.	N/A	

SA Objective		Indicator	Findings	Assessment Score Sept 2011	Assessment Score June 2012
		were coded red, those within 40 metres of a town Conservation Area or within 800m of a village Conservation Area (a PPG2 criteria) were coded orange and broad locations not in proximity to any Conservation Areas were coded green.			
		Is the broad location in or adjacent to a Historic Park and Garden? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a Historic Park and Garden.	The Allocation Area is not within or adjacent to a Historic Park or Garden.	N/A	
		Does the broad location contain or it is adjacent to a Scheduled Ancient Monument (SAM)? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a SAM.	There are no SAMs on or adjacent to the Allocation Area.	N/A	
		Does the broad location fall within or it is adjacent to an Area of Archaeological Importance or a potential archaeological site? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of an Area of Arch' Importance or a potential archaeological site.	The Allocation Area contains a number of sites of archaeological interest.	N/A	
19	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Do parts of the broad location cover or they are adjacent to a Green Corridor? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a Green Corridor.	No.	N/A	
		Is the broad location in or adjacent to areas of designated landscapes (AON, Environmentally Sensitive Areas)?	The Allocated Area is partly adjacent to the Suffolk Coasts & Heaths AONB and lies approximately 200m east of the Dedham Vale & Stour Valley AONB / Suffolk River Valleys ESA.	N/A	

SA Objective		Indicator	Findings	Assessment Score Sept 2011	Assessment Score June 2012
		Will the broad location development lead to coalescence of urban extensions with nearby villages?	Development of the site would not lead to coalescence but will provide opportunities to enhance links between the employment area & the rest of Brantham	N/A	
Economic					
20	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Is the broad location proposed for mixed-use development or employment?	The new Local Plan policy allocates the site as a regeneration area, primarily for employment use, but also includes element of enabling residential development and community facilities.	N/A	
21	To revitalise town centres	Is the broad location proposed for mixed-use development or employment in town centres?	The Allocated Area is not within a town centre location.	N/A	
22	To encourage efficient patterns of movement in support of economic growth	Is the broad location proposed in a proximity to a public transport route or in a walkable / cyclable distance?	The Allocated Area is within reasonable proximity to the Mainline Railway Station at Manningtree and would provide opportunities for improvements for access by other forms of public transport.	N/A	
23	To encourage and accommodate both indigenous and inward investment	Will it increase employment land availability?	The Allocated Area is proposed for mixed-use development, including employment, which should stimulate investment flows.	N/A	
Summary Assessment					
<p>The SA Assessment shows mixed results, with a number of potentially negative effects due to the environmentally sensitive location and risk of flooding. However, the allocation of the regeneration area at Brantham is to address particular site specific regeneration requirements. The alternative 'do nothing' approach will not allow for any positive outcomes. The negative effects can be mitigated against, managed or minimised. In this unique case the positive outcomes of regeneration outweigh the potentially negative impacts.</p>					

Key

Effects

√√	Local	ST-MT	Temp	Low
√	Sub-Reg	ST-LT	Perm	Med
-	Reg/Nat	MT-LT		High
?		ST		
X		MT		
XX		LT		

Assessment

+++	Strongly positive
++	Moderately positive
+	Slightly positive
0	No effect
-	Slightly negative
--	Moderately negative
---	Strongly negative
+/-	Combination of positive and negative effects / neutral effect
n/a	Not assessed

Terms

Mag	Magnitude
Scale	Geographic extent
T/P	Temporary/permanent
Cert	Certainty
ST	Short term
MT	Medium term
LT	Long term
Sm	Summary assessment

Presumption in favour of Sustainable Development													
New Policy CS0													
SA Objective		Effects					Assessment					Commentary	Recommendations
		Mag	Scale	Dur	T/P	Cert		ST	MT	LT	Sm		
1	To improve the health of the population overall	√	Local	ST-LT	T	Med		++	++	++	++	The new policy promotes sustainable development which is likely to be located close to existing services and facilities. This could help to improve accessibility to healthcare facilities for new communities. Minimising the need to travel by car could help to encourage healthy lifestyles through increasing the proportion of journeys made by foot or bicycle. Improvements in the built environment through the implementation of design standards through CS8 and renewable energy through CS9 may improve health through improved living environments.	Specific requirements which may be related to particular developments or locations may need to provide appropriate facilities or infrastructure. These requirements should be addressed through other Strategic policies or future DPDs
2	To maintain and improve levels of education and skills in the population overall	√	Local	MT-LT	T	Med		+	++	++	++	The new policy promotes sustainable development which is likely to be located close to existing services and facilities. This could help to improve accessibility to educational facilities for new communities. Over the long term, policies to ensure the implementation of sustainable design standards and the development of onsite renewable energy generation may lead to the creation of local skills in these industries.	Non identified
3	To reduce crime and anti-social activity	-	Local	ST-LT	T	Med		+	++	++	++	Sustainable development is promoted by the new policy, this should lead to development which can contribute to social / community cohesion "A neighbourhood that is easy to get around tends to feel safer and more	Specific requirements which may be related to particular developments or locations may need to provide appropriate

												secure." Further, development that seeks to reduce the need to travel by car may improve community cohesion through increased community mixing; and could reduce the fear of crime directly through increased natural surveillance.	facilities or infrastructure. These requirements should be addressed through other Strategic policies or future DPDs
4	To reduce poverty and social exclusion	-	Local	ST-LT	T	Med		+	++	++	++	The new policy promotes sustainable development which is likely to be located close to services and facilities should help to reduce poverty and social exclusion through improving equality of opportunity. Further, an overall increase in the quality of the design of development, including improvements to the existing housing stock, should help to ensure that all members of the community are able to access high quality housing.	Specific requirements which may be related to particular developments or locations may need to provide appropriate facilities or infra-structure. These requirements should be addressed through other Strategic policies or future DPDs
5	To improve access to key services for all sectors of the population	√√	Local	ST-LT	T	Med		++	++	++ +	+++	The new policy promotes sustainable development which is likely to locate development to reduce the need to travel by private car and will lead to an improvement in accessibility to services and facilities. This effect is likely to be greater in the long term as more new developments are realised.	To ensure adequate provision of services and access to them is planned into new developments and such requirements incorporated into master plans where appropriate.
6	To offer everybody the opportunity for rewarding and satisfying employment	√√	Local	MT-LT	T	Med		+	+	++	++	The new policy promotes sustainable development which includes seeking to ensure that developments are comprehensive, and include provision for employment, which could increase local job opportunities. This would deliver increasing benefits against the objective as the plan period progresses.	Other policies in the CS contribute towards promoting opportunities for offering everybody the opportunity for rewarding & satisfying employment. Monitoring & review of delivery and the

												evidence base will be essential to ensure the needs are being met and revisions put in place if appropriate.	
7	To meet the housing requirements of the whole community	√	Local	MT-LT	T	Med		+	+	++	++	The new policy promotes sustainable development which includes seeking to ensure that developments are comprehensive, and include provision for housing, which could increase opportunities for meeting housing needs of the whole community. This would deliver increasing benefits against the objective as the plan period progresses	Other policies in the CS contribute towards promoting opportunities for meeting housing needs of the whole community. Monitoring & review of delivery and the evidence base will be essential to ensure the needs are being met and revisions put in place if appropriate.
8	To improve the quality of where people live and to encourage community participation	√	Local		T	Med		+	++	++	++	The new policy promotes sustainable development which should enhance opportunities to seek to ensure developments have a clear identity and a legible network of walking routes through and connecting settlements could enhance community cohesion.	To ensure the master planning process allows for opportunities to encourage community participation. Also opportunities may come forward where neighbourhood plans are pursued.
9	To maintain and where possible improve water quality	√	Local	ST-LT	T	Med		+	++	++	++	The new policy promotes sustainable development which could include opportunities to require development to incorporate SUDS where appropriate, which could help to improve local water quality	It is suggested that the planning considerations to be included in the site allocations DPD incl. safeguarding against potential pollution to watercourses / estuaries and ground-water and promote opportunities for water quality improvements.

													Safeguards with regard to the water quality protection could be further enhanced through appropriate incorporation in the Development Management DPD.
10	To maintain and where possible improve air quality	x	Local	ST-LT	T	Med		-	-	-	-	The new policy promotes sustainable development which will be likely to reduce the need to travel through the provision of local services and facilities where possible in new development and promotes transport hierarchy. This could help reduce increases in traffic over the plan period. However, a substantial modal shift to more sustainable modes of transport may not be possible across the district due to its rural nature. Therefore, transport related emissions may increase.	Future DPDs including site allocations and Development management policies should be specific e.g. thresholds for development size for this requirement need to be specified to avoid ambiguity in the interpretation. The DM DPD could include a separate policy on Sustainable Transport
11	To conserve soil resources and quality	x	Local	ST-LT	T	Med		-	-	-	-	The policy promotes sustainable development which in some cases may be on green field sites, which would be sequentially preferable. However, there will be cases where the opportunities offered by a proposed development, may require green field development, which would impact detrimentally on soil resources. Again a sequential approach to conserving these will also be appropriate through agriculture land classification and other specific designations	It is recommended that the protection of soil quality is followed through and addressed in more detail in the DM DPD. It should specify that although greenfield sites may be permitted for development in some cases, the fragmentation of agricultural holdings should be avoided. A

													<p>requirement for developers to assess the potential for development on brownfield land, ahead of greenfield development could be included.</p> <p>Applications should demonstrate that where brownfield development is not possible, other sustainability factors (such as reducing the need to travel by car) could justify the release of Greenfield land. The use and remediation of potentially contaminated sites should be considered as the first priority. Development on Greenfield land should be of the highest sustainable design standards, including making the most efficient use of land and ensuring areas of high agricultural value are avoided.</p>
12	To use water and mineral resources efficiently, and re-use and recycle where	√	Sub-Reg	ST-LT	T	Med		+/-	+/-	+/-	+/-	The new policy promotes sustainable development which includes the need to be resource efficient. Additional development will inevitably involve the use of primary and secondary materials and resource during construction and	None identified

	possible											operation. Therefore, effects are deemed to be mixed.	
13	To reduce waste	√	Sub-Reg	ST-LT	T	Med		+/-	+/-	+/-	+/-	Sustainable development and other policies in the plan will seek to minimise waste. Although recycling opportunities will be maximised through sustainable development principles, an increase in development will inevitably lead to the growth of waste arisings, therefore the overall effects are deemed mixed.	It is recommended that the future DM DPD includes a policy relating to sustainable waste management, specifically promoting adherence to the waste hierarchy. It should also include the requirement for major development proposals to prepare site waste management plans and construction & environmental management plans (CEMP).
14	To reduce the effects of traffic on the environment	x	Sub-Reg	MT-LT	T	Med		-	-	+/-	-	The promotion of sustainable development is likely to encourage development to be located in areas with good accessibility to a range of services and promotion of opportunities to minimise the use of the car. However, in a rural district development is likely to lead to an overall increase in trip generation. In the longer term this may decrease as new generation cars become more widely used and a higher proportion of residents take up sustainable ways of travelling. The effects will therefore be slightly negative with this potentially balancing to mixed in the longer term	Specific requirements which may be related to particular developments or locations may need to provide appropriate facilities or infrastructure. These requirements should be addressed through other Strategic policies or future DPDs
15	To reduce emissions of greenhouse gases from	-	Reg / Nat	MT-LT	T	Med		+/-	+/-	+/-	+/-	New sustainable development is likely to lead to increases in overall GHG emissions. However other policies in	Requirement to monitor the implementation of

	energy consumption											the plan and sustainability objectives will seek to GHG emissions per unit, so the effects are therefore likely to be mixed.	policies CS7, CS8 and CS9 which could contribute to reducing CO2 emissions etc.. Review and adapt as appropriate.
16	To reduce vulnerability to climatic events	√	Sub-Reg	ST-LT	T	Med		++	++	++	++	The new policy promotes sustainable development which should seek to ensure that development is built to be resilient to the effects of climate change through the use of materials, as well as mitigating flood risk. These elements of the Core Strategy should help ensure that the design of development minimises vulnerability to climate change effects.	Flood mitigation should be taken through to the lower tier policy in the DM DPD. It should elaborate on the requirements for flood risk assessments, flood mitigation and flood resilience measures.
17	To conserve and enhance biodiversity and geodiversity	√	Sub-Reg	ST-LT	T	Med		++	++	++	++	The new policy promotes sustainable development which should seek opportunities to conserve and enhance biodiversity and geodiversity. A sequential approach towards protected sites will be required and will influence the extent to which development is considered sustainable. Overall the effects should be positive, as development which unacceptable damages biodiversity and geodiversity is unlikely to be acceptable. Other development will seek opportunities to enhance these interests.	It is noted that further DC policies will consider the protection of biodiversity and geodiversity in more detail. Biodiversity conservation should include both designated and non-designated habitats and species, as well as the connectivity between them. It is recommended that the Site Allocations DPD includes a map demonstrating the intended and existing GI network, including important ecological and geological sites as well as non-designated assets.

18	To conserve and where appropriate enhance areas of historical and archaeological importance	√	Local	ST-LT	T	Med		+/-	+/-	+/-	+/-	The new policy promotes sustainable development which will include the need for development to reflect local design character and respond to and reinforce locally distinctive patterns of development, landscape and culture which could provide benefits against this objective. Potentially negative effects may arise as a result of a significant increase in the generation of energy from low and zero carbon sources, both on and off sites in relation to their visual impact. Therefore scoring reflects a range of both positive and negative effects.	Further detailed DPD should seek to address potentially negative effects that may arise from the incorporation of low and zero carbon energy technologies on the historic environment in accordance with the latest national guidance
19	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	-	Local	ST-LT	T	Med		+/-	+/-	+/-	+/-	The new policy promotes sustainable development which will include ensuring Improvements to the quality of design in new development should have a positive effect on local landscapes and townscapes. Potentially negative effects in terms of visual impact may arise from the development of large scale renewable energy generation schemes. Therefore a range of positive and negative effects are predicted.	Further detailed DPD should seek to address potentially negative effects that may arise from the incorporation of low and zero carbon energy technologies on the landscape in accordance with the latest national guidance.
20	To achieve sustainable levels of prosperity and economic growth throughout the plan area	√√	Sub-Reg	MT-LT	T	Med		+	+	++	++	The new policy promotes sustainable development which will include ensuring improvement in the quality of design may improve the attractiveness of the area which could encourage economic growth. Economic growth may also be stimulated through increasing footfall through the co-location of services, facilities & employment with housing.	None identified

21	To revitalise town centres	√	Local	MT-LT	T	Med		+	++	++	++	The new policy promotes sustainable development which will include seeking to improve the quality of design throughout the district which could help to improve the attractiveness of town centres to potential residents and employers. An increase in travel by walking and cycling could help to reinforce this effect through increasing footfall locally, as well as leading to reduced traffic and related environmental improvements such as reduced air and noise pollution.	None identified
22	To encourage efficient patterns of movement in support of economic growth	√	Local	MT-LT	T	Med		+	++	++	++	The new policy promotes sustainable development which will encourage economic growth which may also be stimulated through increasing footfall through the co-location of services, facilities and employment with housing. Encouraging development to be close to public transport may encourage greater accessibility supporting economic growth and reducing out-commuting.	None identified
23	To encourage and accommodate both indigenous and inward investment	√	Sub-Reg	MT-LT	T	Med		+/-	+	++	+	The new policy promotes sustainable development which will encourage an improvement in the quality of design and may improve the attractiveness of the area which could encourage further investment in the long term. However, stringent planning controls through sustainable design standards could reduce initial investment interest from developers who may regard this as creating increased initial costs.	None identified

Housing													
Proposed Amended Policy CS14 Mix and Types of Dwellings													
		Effects					Assessment						
SA Objective		Mag	Scale	Dur	T/P	Cert		ST	MT	LT	Sm	Commentary	Recommendations
1	To improve the health of the population overall	√	Local	MT-LT	Temp	Med		+	++	++	++	Amended Policy CS14 seeks to provide a mix of dwelling types to meet established local needs. This is likely to have positive effect on health, particularly as the provision of elderly / special needs accommodation may be a significant determinant of the quality of life for this section of the community. The provision of pitches for Gypsies, Travellers & Travelling Showpeople communities may improve the health of these communities through ensuring that they have good access to health facilities that may otherwise not be the case. Effects are likely to be more significant over the medium to longer term as more sites are developed.	None identified.
2	To maintain and improve levels of education and skills in the population overall	√	Local	MT	Temp	Low		0	+	++	+	Insofar as the provision of Gypsy, Traveller & Travelling Showpeople sites will ensure that these communities have good access to educational services, overall skills levels may increase in the long term. The development of bricks and mortar housing may increase potential to access to education and job opportunities, again delivering potential improvements in local skills levels as other strategic policies require that new development is close to or incorporates social infrastructure, services and facilities. This may include educational facilities.	None identified.

3	To reduce crime and anti-social activity	√	Local	ST-LT	Temp	Low		+/-	+	+	+	<p>The development of Gypsy, Traveller and Travelling Showpeople sites through policy CS14 is likely to give rise to a range of effects: efforts to integrate travelling and settled communities and upgrade the quality of provision for Gypsies, Travellers and Travelling Showpeople; however, significant prejudices exist and it is likely that perceptions of crime will continue the current trend of outstripping actual crime levels. The Policy, together with affordable housing policy, seek to provide an increase mix of bricks and mortar housing, affordable housing and rural housing. These policies may lead to an increase in the diversity of communities, which could help to increase community interaction and reduce the fear of crime. Overall, the balance of effects is predicted to be slightly beneficial.</p>	<p>The Policy CS14 relating to the provision of Gypsy, Traveller and Travelling Showpeople sites should be strengthened to provide a clearer expression of numbers and location of pitches, targets, deliverability and emphasis the need for integration of travelling and settled communities. Some of these details can be set out in the lower tier document, e.g. the site allocations DPD.</p>
4	To reduce poverty and social exclusion	√√	Sub-Reg	ST-LT	Temp	Med		++	++	++	++	<p>The amended Policy CS14 together with affordable housing policies seek to redress the balance in the provision of housing across the district by responding to specific identified needs across a range of demographic groups. This could help to reduce social exclusion through the provision of specific types of housing to meet local needs as well as improving accessibility to local services & facilities. This may help to increase the mix of population ages, retaining younger people within communities and increase local employment levels, adding to vitality and viability.</p>	<p>Further details regarding the established needs in terms of accommodation needs are expected to be provided in the Site Allocations DPD as mentioned in the policy CS14 supporting text.</p>

5	To improve access to key services for all sectors of the population	√	Local	ST-LT	Temp	Med		++	++	++	++	Policy CS14 seeks to provide a mix and type of dwellings to accommodate the needs of all sectors of the population. The location and distribution of these homes will be subject to other strategic policies which seek to ensure they are located close to key services and facilities.	It should be ensured that any provision of new services and facilities as part of new development are provided to benefit existing as well as new communities, and that they are provided ahead of the occupation of new residential developments. Amended Policy CS 14 includes the need to accommodate Gypsies and Traveller sites in respect of the other strategic policies
6	To offer everybody the opportunity for rewarding and satisfying employment	√	Local	LT	Temp	Low		+	+	+	+	The provision of a mix of housing, through the amended policy CS14 and other strategic policies seek to provide for a range of people which could help to improve the diversity of the community and enable a greater diversity in the composition of the workforce in the district. This, alongside the requirement for developments to be within accessible distances to employment facilities, may help to improve the potential for greater levels of employment within the district over the long term.	None identified.

7	To meet the housing requirements of the whole community	√√	Local	MT-LT	Temp	High		++	+++	+++	+++	The amended policy CS14 seeks to meet the housing requirements of the whole community, specifically those with identified housing needs (both the travelling and settled population). Effects are likely to be greater over the medium to long term as more development sites are realised and the required proportions of special needs/affordable housing are provided.	The Policy CS14 relating to the provision of Gypsy, Traveller & Travelling Showpeople sites should be strengthened to provide a clearer expression of no's & location of pitches, targets, deliverability and emphasis the need for integration of travelling and settled communities. Some of these details can be set out in the lower tier document, e.g. the site allocations DPD.
8	To improve the quality of where people live and to encourage community participation	√	Local	MT-LT	Temp	Med		+	+	++	+	An increase in the mix of housing, including affordable housing and Gypsy, Traveller and Travelling Showpeople sites, is likely to lead to an increase in the socioeconomic mix of the communities within the district. The delivery of this policy in line with other strategic policies will ensure that that development is provided close to or with the necessary infrastructure for developments to reduce the need to travel. This may increase the proportion of the community that live, work and play within their local area and lead to an increase in social mixing and cohesion, with greater effects being realised in the medium to longer term.	Ensure adequate infrastructure including green infrastructure is provided close to where people live and work. Other strategic policies and future DPDs incl. Site Allocations, Dev' Management policies and where appropriate Neighbourhood Plans, as well as the master planning process will need to ensure this provision which should in turn help promote greater community participation.

9	To maintain and where possible improve water quality	-	Local	ST-LT	Perm	Low		-/+	-/+	-/+	-/+	The type of housing development under the amended Policy CS14 will not directly affect the quality of local water resources as all development will be subject to the planning requirements of other strategic policies	Detailed considerations relating to specific sites or issues will need to be covered more thoroughly where appropriate in future DPDs incl. Site Allocations & Dev' Management policies.
10	To maintain and where possible improve air quality	-	Local	ST-LT	Perm	Low		-/+	-/+	-/+	-/+	The type of housing development under the amended Policy CS14 will not directly affect the local air quality and all development will be subject to the planning requirements of other strategic policies.	Detailed considerations relating to specific sites or issues will need to be covered more thoroughly where appropriate in future DPDs incl. Site Allocations & Dev' Management policies.
11	To conserve soil resources and quality	-	Local	ST-LT	Perm	Low		-/+	-/+	-/+	-/+	The type of housing development under the amended Policy CS14 will not directly affect the local soil resources quality and all development will be subject to the planning requirements of other strategic policies.	Detailed considerations relating to specific sites or issues will need to be covered more thoroughly where appropriate in future DPDs incl. Site Allocations & Dev' Management policies.
12	To use water and mineral resources efficiently, and re-use and recycle where	-	Local	ST-LT	Perm	Low		-/+	-/+	-/+	-/+	The type of housing development under the amended Policy CS14 will not directly affect the local mineral resources and all development will be subject to the planning requirements of other strategic policies which will	Detailed considerations relating to specific sites or issues will need to be covered more thoroughly

	possible											include promoting opportunities to maximise re-use and recycling where possible.	where appropriate in future DPDs incl. Site Allocations and Dev' Management policies.
13	To reduce waste	-	Local	ST-LT	Perm	Low		-/+	-/+	-/+	-/+	The type of housing development under the amended Policy CS14 will not directly affect the local waste issues and all development will be subject to the planning requirements of other strategic policies, which will include promoting opportunities to maximise the reduction of waste where possible.	Detailed considerations relating to specific sites or issues will need to be covered more thoroughly where appropriate in future DPDs incl. Site Allocations and Dev' Management policies.
14	To reduce the effects of traffic on the environment	-	Local	ST-LT	Perm	Low		-/+	-/+	-/+	-/+	The type of housing development under Policies CS14 is not likely to have a direct effect on traffic and all development will be subject to the same requirements under other strategic policies.	Detailed considerations relating to specific sites or issues will need to be covered more thoroughly where appropriate in future DPDs incl. Site Allocations and Dev' Management policies.
15	To reduce emissions of greenhouse gases from energy consumption	-	Local	ST-LT	Perm	Low		-/+	-/+	-/+	-/+	The type of housing development under Policies CS14 is not likely to have a direct effect on green house gas emissions and all development will be subject to the same requirements under other strategic policies.	Detailed considerations relating to specific sites or issues will need to be covered more thoroughly where appropriate in future DPDs incl. Site Allocations and Dev' Management policies.

16	To reduce vulnerability to climatic events	-					0	0	0	0	The type of housing provided is not likely to have a direct effect against this objective. All development will be subject to the same requirements under other strategic policies	The Site Allocations doc' could be used to clarify the location of potential Gypsy, Traveller & Travelling Showpeople sites. This offers the opportunity to ensure national policies are effectively translated into local approaches to delivery. Specifically, the high vulnerability of pitches to flood risk should be recognised in site allocation process.
17	To conserve and enhance biodiversity and geodiversity	-	Local	ST-LT	Perm	Low	-/+	-/+	-/+	-/+	The type of housing provided is not likely to have a direct effect against this objective. All development will be subject to the same requirements under other strategic policies. New development in rural areas may have some effects on biodiversity and geodiversity, although it is likely that these effects will be mitigated through the development criteria in other strategic policies. Therefore, overall effects are deemed to be a mixture of negative and positive.	Detailed considerations relating to specific sites or issues will need to be covered more thoroughly where appropriate in future DPDs including Site Allocations and Development Management policies.
18	To conserve and where appropriate enhance areas of historical and archaeological importance	-	Local	ST-LT	Perm	Low	-/+	-/+	-/+	-/+	The type of housing provided is not likely to have a direct effect against this objective. All development will be subject to the same requirements under other strategic policies. New dev' may have some effects on historical/archaeological areas, although it is likely that these effects will be mitigated through the development criteria in other strategic policies. Therefore, overall effects are deemed to be a mixture of negative and positive.	Detailed considerations relating to specific sites or issues will need to be covered more thoroughly where appropriate in future DPDs incl. Site Allocations and Dev' Management policies.

19	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	-	Local	ST-LT	Perm	Low		-/+	-/+	-/+	-/+	The type of housing provided is not likely to have a direct effect against this objective. All development will be subject to the same requirements under other strategic policies. New dev' may have some effects on the quality and local distinctiveness of landscapes & townscapes, although it is likely that these effects will be mitigated through the development criteria in other strategic policies. Therefore, overall effects are deemed to be a mixture of negative and positive.	Detailed considerations relating to specific sites or issues will need to be covered more thoroughly where appropriate in future DPDs incl. Site Allocations and Dev' Management policies.
20	To achieve sustainable levels of prosperity & economic growth throughout the plan area	√	Local	MT-LT	Temp	Low		+	+	+	+	The increased diversity in the socioeconomic mix that may arise from an increase in diversity within housing provision may help to encourage improved economic diversity and thus help to strengthen the resilience of the local economy.	None identified.
21	To revitalise town centres	√	Local	MT-LT	Temp	Med		+	+	++	++	The increased diversity in the socioeconomic mix that may arise from an increase in diversity within housing provision may help to encourage improved economic diversity. A more diverse and larger catchment population is also likely to better support the revitalisation and longer term viability of the town centres.	None identified.
22	To encourage efficient patterns of movement in support of economic growth	√	Local	MT-LT	Temp	Med		+	+	++	+	The type of housing provided may have an effect against this objective in that the provision of a greater mix of socioeconomic groups within the community alongside the provision of increased accessibility to employment opportunities may help to encourage more people to work locally, and access employment by more sustainable modes of transport. This effect will be most noticeable over the medium to long term.	None identified.

23	To encourage and accommodate both indigenous and inward investment	√	Local	ST-LT	Temp	Low		+	+	+	+	The increased diversity in the socioeconomic mix that may arise from an increase in diversity within housing provision may help to encourage inward investment through an increase in the diversity of the local labour force, especially as new housing provision will be within accessible distances of employment sites.	None identified.
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Housing													
Proposed Amended Policy CS15 Affordable Homes													
SA Objective		Effects					Assessment					Commentary	Recommendations
		Mag	Scale	Dur	T/P	Cert		ST	MT	LT	Sm		
1	To improve the health of the population overall	√	Local	MT-LT	Temp	Med		+	++	++	++	The amended Policy CS15 retains the overall objective to provide additional affordable housing throughout the district, to be delivered on strategic sites and in association with other development throughout the district. Contributing towards meeting these needs is a priority for Babergh and is likely to have beneficial effects, particularly in the longer term.	None identified
2	To maintain and improve levels of education and skills in the population overall	√	Local	MT	Temp	Low		0	+	++	+	The amended policy CS15 will help provide affordable housing for the needs of the population. This is likely to be located in areas with good accessibility to services including schools potentially offering improved opportunities for education.	None Identified.

3	To reduce crime and anti-social activity	√	Local	ST-LT	Temp	Low		+/-	+	+	+	CS15 seeks to provide an increase in housing, affordable housing and rural housing. This amended policy may lead to an increase in the diversity of communities, which could help to increase community interaction and reduce the fear of crime. Overall, the balance of effects is predicted to be slightly beneficial.	Detailed considerations relating to specific sites or issues will need to be covered more thoroughly where appropriate in future DPDs incl. Site Allocations and Dev' Management policies.
4	To reduce poverty and social exclusion	√√	Sub-Reg	ST-LT	Temp	Med		++	++	++	++	Amended Policy CS15 seeks to redress the balance in the provision of housing across the district by responding to specific identified needs across a range of demographic groups and in particular affordable housing provision. This could help to reduce social exclusion through the provision of specific types of housing to meet local needs as well as improving accessibility to local services and facilities. This may help to increase the mix of population ages, retaining younger people within communities and increase local employment levels, adding to vitality and viability.	Further details regarding the established needs in terms of accommodation needs are expected to be provided in the Site Allocations DPD as mentioned in the supporting text.
5	To improve access to key services for all sectors of the population	√	Local	ST-LT	Temp	Med		++	++	++	++	Amended Policy CS15 together with CS16 seek to provide affordable housing in all areas including rural locations. In accordance with other strategic policies, this development will have good access to services and facilities, which will help generate benefits for more sectors of the population.	Detailed considerations relating to specific sites or issues will need to be covered more thoroughly where appropriate in future DPDs incl. Site Allocations & Dev' Management policies.

6	To offer everybody the opportunity for rewarding and satisfying employment	√	Local	LT	Temp	Low		+	+	+	+	The provision of a mix of housing, through the policies including affordable housing for a range of people could help to improve the diversity of the community and enable a greater diversity in the composition of the workforce in the district. This, alongside the requirement in policy CS7 for developments to be within accessible distances to employment facilities, may help to improve the potential for greater levels of employment within the district over the long term.	None identified.
7	To meet the housing requirements of the whole community	√√	Local	ST-LT	Temp	High		++	+++	+++	+++	The amended policy seeks to meet the housing requirements of the whole community, specifically those with identified housing needs. There is an affordable housing target for all developments to provide 35%. Effects are likely to be greater over the medium to long term as more development sites are realised and the required proportions of special needs / affordable housing are provided.	None identified.
8	To improve the quality of where people live and to encourage community participation	√	Local	MT-LT	Temp	Med		+	+	++	+	An increase in the mix of housing, incl. affordable housing, is likely to lead to an increase in the socio-economic mix of the communities within the district. The delivery of this policy in line with other strategic policies will ensure that development is provided close to or with the necessary infrastructure for developments to reduce the need to travel. This may increase the proportion of the community that live, work and play within their local area	Green space will be provided through policy CS9.

												and lead to an increase in social mixing and cohesion, with greater effects being realised in the medium to longer term.	
9	To maintain and where possible improve water quality	X	Local	ST-LT	Perm	Low		-	-	-	-	Amended Policy CS15 – affordable housing will not directly affect the quality of local water resources and all development will be subject to the planning requirements of other strategic policies.	Detailed considerations relating to specific sites or issues will need to be covered more thoroughly where appropriate in future DPDs incl. Site Allocations and Dev’ Management policies.
10	To maintain and where possible improve air quality	X	Local	ST-LT	Perm	Low		-	-	-	-	Amended Policy CS15 – affordable housing will not directly affect the local air quality and all development will be subject to the planning requirements of other strategic policies.	Detailed considerations relating to specific sites or issues will need to be covered more thoroughly where appropriate in future DPDs incl. Site Allocations and Dev’ Management policies.
11	To conserve soil resources and quality	X	Local	ST-LT	Perm	Low		-	-	-	-	Amended Policy CS15 – affordable housing will not directly affect the local soil resources and quality. Although development of affordable housing as part of overall housing provision may have a moderately negative impact on soil resources in some cases. However, all development will be subject to the planning requirements of other strategic policies.	Detailed considerations relating to specific sites or issues will need to be covered more thoroughly where appropriate in future DPDs incl. Site Allocations & Dev’ Management policies.

12	To use water and mineral resources efficiently, and re-use and recycle where possible	X	Local	ST-LT	Perm	Low	-	-	-	-	Amended Policy CS15 – affordable housing will not directly affect the efficient use of mineral resources. Although development of affordable housing as part of overall housing provision may have a moderately negative impact on the efficient use of mineral resources in some cases. However, all development will be subject to the planning requirements of other strategic policies which will include promoting opportunities to recycle where possible.	Detailed considerations relating to specific sites or issues will need to be covered more thoroughly where appropriate in future DPDs incl. Site Allocations and Dev' Management policies.
13	To reduce waste	X	Local	ST-LT	Perm	Low	-	-	-	-	Amended Policy CS15 – affordable housing will not directly affect the opportunities to reduce waste. Although development of affordable housing as part of overall housing provision may have a moderately negative impact on the ability for overall waste reduction. However, all development will be subject to the planning requirements of other strategic policies which will seek to minimise waste.	None Identified.
14	To reduce the effects of traffic on the environment	X	Local	ST-LT	Perm	Low	-	-	-	-	Amended Policy CS15 – affordable housing will not directly affect the effects of traffic. Although development of affordable housing as part of overall housing provision may have a moderately negative impact on the effects of traffic in some cases. However, all development will be subject to the planning requirements of other strategic policies which will include minimising the effects of traffic and encouraging affordable housing to be provided in locations with good accessibility to local services.	Detailed considerations relating to specific sites or issues will need to be covered more thoroughly where appropriate in future DPDs incl. Site Allocations and Development Management policies.

15	To reduce emissions of greenhouse gases from energy consumption	X	Local	ST-LT	Perm	Low		-	-	-	-	Amended Policy CS15 - affordable housing will not directly affect the emissions of greenhouse gases from energy consumption. Although development of affordable housing as part of overall housing provision may have a moderately negative with potential for development to create an overall increase in the emissions of greenhouse gases from energy consumption. However, all development will be subject to the planning requirements of other strategic policies which will include minimising the emissions from greenhouse gases and encouraging affordable housing to be provided in locations with good accessibility to local services.	Detailed considerations relating to specific sites or issues will need to be covered more thoroughly where appropriate in future DPDs including Site Allocations and Development Management policies.
16	To reduce vulnerability to climatic events	-						0	0	0	0	The type of housing provided including whether or not it is affordable housing, is not likely to have a direct effect against this objective. All development will be subject to the same requirements under other strategic policies.	Detailed considerations relating to specific sites or issues will need to be covered more thoroughly where appropriate in future DPDs incl. Site Allocations and Dev Management policies
17	To conserve and enhance biodiversity and geodiversity	?	Local	MT-LT	Temp	Low		0	0	0	0	The type of housing provided including whether or not it is affordable housing, is not likely to have a direct effect against this objective. All development will be subject to the same requirements under other strategic policies. New development in some cases may	Detailed considerations relating to specific sites or issues will need to be covered more thoroughly where appropriate in future DPDs

											have some effects on biodiversity and geodiversity, although it is likely that these effects will be mitigated through the development criteria in other strategic Policies. Therefore, overall effects are deemed neutral.	including Site Allocations and Development Management policies.	
18	To conserve and where appropriate enhance areas of historical and archaeological importance	?	Local	MT-LT	Temp	Low		0	0	0	0	The type of housing provided including whether or not it is affordable housing, is not likely to have a direct effect against this objective. All development will be subject to the same requirements under other strategic policies. New development in some cases may have some effects on areas of historical and archaeological importance, although it is likely that these effects will be mitigated through the development criteria in other strategic Policies. Therefore, overall effects are deemed neutral.	Detailed considerations relating to specific sites or issues will need to be covered more thoroughly where appropriate in future DPDs including Site Allocations and Development Management policies.
19	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	?	Local	MT-LT	Temp	Low		0	0	0	0	The type of housing provided including whether or not it is affordable housing, is not likely to have a direct effect against this objective. All development will be subject to the same requirements under other strategic policies. New development in some cases may have some effects on the quality and local distinctiveness of landscapes and townscapes, although it is likely that these effects will be mitigated through the development criteria in other strategic Policies. Therefore, overall effects are deemed neutral.	Detailed considerations relating to specific sites or issues will need to be covered more thoroughly where appropriate in future DPDs including Site Allocations and Development Management policies.

20	To achieve sustainable levels of prosperity and economic growth throughout the plan area	√	Local	MT-LT	Temp	Low		+	+	+	+	The increased diversity in the socioeconomic mix that may arise from an increase in diversity within housing provision may help to encourage improved economic diversity and thus help to strengthen the resilience of the local economy.	None identified.
21	To revitalise town centres	√	Local	MT-LT	Temp	Low		+	++	++	++	The increased diversity in the socioeconomic mix that may arise from an increase in diversity within housing provision may help to encourage improved economic diversity. A more diverse and larger catchment population is also likely to better support the revitalisation and longer term viability of the town centres.	None identified.
22	To encourage efficient patterns of movement in support of economic growth	√	Local	MT-LT	Temp	Med		+	+	++	++	The type of housing provided may have an effect against this objective in that the provision of a greater mix of socioeconomic groups within the community alongside the provision of increased accessibility to employment opportunities may help to encourage more people to work locally, and access employment by more sustainable modes of transport. This effect will be most noticeable over the medium to long term.	None identified.
23	To encourage and accommodate both indigenous and inward investment	√	Local	MT-LT	Temp	Med		+	+	++	+	The increased diversity in the socioeconomic mix that may arise from an increase in diversity within housing provision may help to encourage inward investment through an increase in the diversity of the local labour force, especially as new housing provision will be within accessible distances of employment sites.	None identified.