

# **Babergh District Council Local Development Framework**

## **Sustainability Appraisal and Strategic Environmental Assessment for Core Strategy Issues and Options Report**

### **Summary Document**

**May 2009**



## Introduction

Sustainability Appraisals (SA) and Strategic Environmental Assessments (SEA) are carried out as a requirement of European and UK legislation and cover social, environmental and economic topics. Babergh District Council in partnership with other Suffolk authorities has agreed a methodology for this process, which has been set out in the scoping report consulted upon late in 2006 and January 2007 and adopted in 2007. SA/SEA has been carried out in accordance with government guidance: 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks' November 2005 from the Office of the Deputy Prime Minister.

Sustainable development is often referred to as 'development that meets the needs of the present generation without compromising the ability of future generations to meet their own needs'.

We are now on the first stage of consultation for the Core Strategy of the new Local Development Framework, which will replace the Local Plan. This stage of the consultation process is looking at what are the main issues facing and reasonable options available to the district when looking at its future development. The options assessed in this Sustainability Appraisal are those contained in the Issues and Options Core Strategy Report.

At this stage we are not seeking to recommend any particular option, just show what the Council consider the likely effects of each option are and invite comments on the assessments as well as help inform people about the choices which have to be made. This document forms the first part of an on going process which helps shape the final Core Strategy for the district.

## Methodology

The agreed set of objectives against which assessments are made includes 23 objectives in total with 8 social objectives, 11 environmental objectives and 4 economic objectives. Under these objectives are a series of sub objectives and indicators, which can be monitored and assessed.

## Social Objectives

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

## Environmental Objectives

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 contributions to climate change
16. To reduce vulnerability to climatic events
17. To conserve and enhance biodiversity and geodiversity
18. To conserve and where appropriate enhance areas of historical and archaeological importance
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes

## Economic Objectives

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

The tables produced for the SA and SEA cover several pages and result in a large document, but this document summarises the overall findings.

The scoring in the tables for each option against each objective and indicator is whether it has a positive effect, negative, neutral effect or the effect is uncertain and the range is set out below:-

The Option will have a very positive impact on the sustainability objective	<b>++</b>
The Option will have a slightly positive impact on the sustainability objective	<b>+</b>
The Option will have a negligible or neutral impact on the sustainability objective. A recorded neutral effect does not necessarily mean there will be no effect at the project level, but shows that at this strategic level there are no identifiable effects.	<b>0</b>
The Option will have a slightly negative impact on the sustainability objective	<b>-</b>
The Option will have a very negative impact on the sustainability objective	<b>--</b>
The Option impact on an issue is uncertain/cannot be predicted at this stage	<b>?</b>

Option	Key Results	Comments
<b>Section 4: Spatial Strategy for Babergh district</b>		
<b>Spatial Strategy</b>		
<b>Option 1: Business as Usual</b>	+ 29 – 2 ? 18	There are considered to be many benefits of this option, including the possible creation of new jobs and sustaining economic development, access to services and it should contribute to the reduction in car journeys and many people should have access to a variety of services.
<b>Option 2: Maximum Urban Concentration</b>	+ 29 – 3 ? 18	There are many advantages to this option but there are also problems to be resolved including its potential negative impact on rural areas.
<b>Option 3: Equitable Dispersion</b>	+ 22 – 3 ? 14	This option will reinforce town centres as well as potentially helping sustain rural services
<b>Option 4: Rural Development</b>	+ 22 – 5 ? 22	This option could have an adverse impact on town centres as well as the countryside, and not result in sufficient services to meet the needs of the new population.
<b>Option 5: New Settlement</b>	+ 26 – 6 ? 18	This option could allow services and the latest design to be built in from the outset but there would be an adverse impact on the countryside in that area.
<b>Housing (and other) Development in Rural Areas</b>		
<b>Question SS4: Option1: No Change (groups up to 3 dwellings)</b>	+ 4 – 12	This will help meet the need for housing but would increase the need to use a car.
<b>Question SS4: Option2: Groups from 5-6 dwellings</b>	+ 3 – 15 – – 2	This should increase the number of affordable dwellings but, would have an adverse impact on commuting patterns and the need to use the car.
<b>Question SS4: Option3: Groups from 10-12 dwellings</b>	+ 4 – 11 – – 5	This should increase the number of dwellings available and the affordability, but fewer people would have easy access to services and would be more dependent on the car.
<b>Question SS4: Option4: Groups up to 15 dwellings</b>	+ 3 – 11 – – 8	This option has very significant adverse effects, particularly on the landscape and access to services as well as car usage.
<b>Section 5: Housing</b>		
<b>Affordable Housing Provision</b>		
<b>Question H2: Option 1:</b>	+ 7	This option is likely to have several positive

Option	Key Results	Comments
Target of less than 500 new affordable homes per 5-year period	– 2 ?/- 1	effects particularly relating to social indicators such as reducing homelessness, and increasing the range and affordability of housing. Limited negative effects are anticipated and these could be mitigated by careful site selection.
Question H2: Option 2 Target of 500 new affordable homes per 5-year period	+ 7 – 2 ?/- 1	This option is likely to have similar effects to the previous option (option 1) but added benefits in terms of significant positive long term, cumulative and synergistic effects predicted.
Question H2: Option 3: Target of 600 new affordable homes per 5-year period	++ 2 + 5 – 2 ?/- 1	This option is likely to have similar effects to the previous option (option 2) but in addition significant positive social effects are predicted.
Question H2: Option 4: Target of 700 new affordable homes per 5-year period	++ 3 + 4 – 2 ?/- 1	This option is likely to have similar effects to the previous option (option 3) but more significant positive social effects are predicted.
Question H2: Option 5: Target of more than 700 new affordable homes per 5-year period	++ 3 + 4 – 2 ?/- 1	This option is likely to have similar effects to the previous option (option 4) but with additional significant positive short term effects.
<b>Affordable Housing Requirements: Percentages</b>		
Question H4: Option 1: Reduce the percentage affordable housing required to below 35%	+ 4	This option is likely to have positive impacts such as reducing poverty and reducing homelessness.
Question H4: Option 2: Leave it at 35%	++ 2 + 2	This option is likely to have similar effects to the previous option (option 1) but some of these effects are predicted to be significantly positive effects.
Question H4: Option 3: Increase it above 40%	++ 3 + 1 -1	This option is likely to have similar effects to the previous option (option 2), but with more significant positive effects are predicted. This option could have a negative effect in terms of housing delivery
<b>Affordable Housing Requirements: Site Development Thresholds</b>		
Question H5: Option 1: Lower percentage of provision on developments falling below between 10-14 units and a further lower percentage for developments between 5-9 units	+ 4	There are several advantages to this option mainly relating to the social objectives such as increasing the range and affordability of housing and increasing neighbourhood satisfaction. Significant positive long term, cumulative and synergistic effects are predicted.
Question H5: Option 2:	+ 4	This option is likely to have similar effects

Option	Key Results	Comments
Standard percentage and lower thresholds		to the previous option (option 1) but significant positive long term, cumulative and synergistic effects are not predicted
<b>Gypsies, Travellers and Travelling Showpeople's Accommodation</b>		
Option 1: Plan for provision through expansion of existing sites	+ 4 – 13 ?/- 1	This option is likely to have a number of negative effects, with some positive effects. Negative effects include effects such as access to services and loss of greenfield land. Positive effects include reducing poverty and provision of sufficient housing.
Option 2: Plan for provision through entirely new sites	+ 4 ? 14	This option is likely to have mostly unknown effects and some positive effects. Unknown effects such as access to services and the need for local travel have been identified as it is not determined where sites will be allocated. Similar positive effects have been identified to those in the previous option (option 1).
Option 3: Plan for provision through a combination of Option 1 and 2	+ 4 – ? 14	The effects predicted for this option is a combination of those for option 1 and option 2.
Option 4: Plan for provision through rural exceptions site policies	+ 6 – 9 ? 3	This option is likely to have a number of negative effects, with a few positive effects. Negative effects include effects such as access to services and loss of greenfield land. Positive effects include reducing poverty and provision of sufficient housing.
Option 5: Plan for provision through planned sites wherever major developments come through	+ 13 – 2 ? 3	There are many advantages to this option, a couple of disadvantages and a few unknown effects predicted. Positives include access to services and the provision of sufficient housing.
<b>Section 6: Economy and Employment</b>		
<b>Employment Land</b>		
Question EMP5: Option EMP1: Maintain current allocations and seek to gain increases in land availability	+ 11 – 2	This option has mostly positive effects with a couple of negative effects. Positive effects are anticipated such as reducing unemployment and provision of sufficient employment land. Negative effects include loss of greenfield and agricultural land. Mitigation could include careful site selection.
Question EMP5: Option EMP2: Maintain current allocations and allocate new sites	+ 6 ? 13	This option has less positive effects than option 1 but more unknown effects. The unknown effects will depend on the location of new employment sites.
Question EMP5: Option	+ 9	This option has a large number of positive

Option	Key Results	Comments
<b>EMP3: Maintain existing sites and allocate at local centres and more rural locations</b>	– 5 ?1	effects but also a number of negative effects including negatives such as poor access to services.
<b>Question EMP5: Option EMP4: De-allocate some sites not already developed and allocate elsewhere</b>	+ 6 ? 13	Similar to Option EMP2. Additional significant negative cumulative and synergistic effects are anticipated as a loss of additional greenfield and agricultural land.
<b>Question EMP5: Option EMP5: Concentrate on provision of new employment land in the same locations as residential development, or through mixed use developments</b>	+ 11 – 2 ?2	Similar to Option EMP1. Two unknown effects have been identified as mixed developments could impact on town centres, depending on their location.
<b>Section 7: Built and Natural Environment</b>		
<b>Flood risk</b>		
<b>Question NBE2: Option 1: Development which cannot be located away from flood risk should contribute towards mitigation</b>	++ 2 + 2	National policy controls development in flood risk areas to a degree, but where development can not be situated away from flood risk areas, contributions towards mitigation should be made.
<b>Question NBE2: Option 2: Development which cannot be located away from flood risk does not need to contribute towards mitigation</b>	– 2 – –2	It would be irresponsible to allow development (which would inevitably contribute to risk) to take place in an area of higher flood risk without requiring some contribution towards mitigation measures.
<b>Flood risk and climate change considerations</b>		
<b>Question NBE3: The options consider how far ahead we should consider climate change, and so this SA has been carried out considering only the fact that future change should be considered, not specifically how far in the future.</b>	++ 3 + 1	Climate change should definitely be considered through policies as far in advance as it is reasonable to do so, and as far as robust predictions can be made.
<b>Pollution (Air quality)</b>		
<b>Question NBE4: Option 1: Locate development away from sources of pollution and develop in areas which</b>	++ 9 + 6 – 1	The definition for what constitutes “pollution” would need to be carefully considered. Many of the benefits stem from the need to locate development in accessible locations,

Option	Key Results	Comments
minimise the use of the car		reducing the need to use the car (which should also be set out in other policies).
Question NBE4:Option 2: Allow development in areas where air quality is an issue only if mitigation measures are put in place	++ 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.
Question NBE4:Option 3: Develop a specific air quality management policy	++ 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, for example, renewable energy or other sustainability objectives into a policy. It is difficult to appraise fully without full policy details.
<b>Section 8: Sustainability and Climate Change</b>		
<b>Residential Development</b>		
Question SUS6 Option1: National Minimum Standard	+ 6	This option will result in the more efficient use of resources and energy.
Question SUS6 Option2: higher Standards introduced a year earlier	++ 1 + 6	This 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.
Question SUS7: Option1: All new build and conversions in excess of 1 room.	+ 5 + 1	There are major positive benefits for this option, including the use of water and recycling as well as the reduced use of energy.
Question SUS7: Option 2: All new developments of 1 dwelling and above	+ 6	There are 6 minor positive benefits identified in this option, which are similar to the first option, but do not benefit so many properties.
Question SUS7: Option 3: All development 3 dwellings and above	+ 6	There will still be benefits from this option but they will apply to fewer dwellings, with many developments in the district of less than 3 dwellings.
<b>Non Residential Development</b>		
Question SUS8: Option1: National minimum standards (Building reg's)	+ 5 ? 1	Building regulations for non domestic properties can be stricter than for dwellings and can require the use of renewable energy sources and energy saving measures.
Question SUS8: Option2: BREEAM Good standard	+ 6 ? 2	This standard requires more efficient use of water as well as energy.

Option	Key Results	Comments
Question SUS8: Option3: BREEAM Very Good standard	++ 1 + 9	There are wider ranging benefits for this option but the initial capital cost will be higher. Benefits include a substantial reduction in energy consumption.
Question SUS8: Option4: BREEAM Excellent standard	++ 3 + 12	There are now substantial benefits from this option which include; efficient use of energy, water and minerals as well as energy from renewable resources, but there are substantial initial capital costs.
Question SUS9: Option1: All developments of 1 room or more	++ 4 + 8	There are many benefits of this option including efficient use of, water, energy and minerals as well as safeguarding or improving important biodiversity sites and encouraging reduced car usage, but there are substantial initial capital costs.
Question SUS9: Option2: Development over 0.1 Ha or 100 sq m	++ 1 + 8 ? 1	There are still benefits from this approach but they are not so strong as they apply to fewer developments
Question SUS9: Option3: Development over 1 Ha or 1000 sq m	+ 5 ? 2	The benefits of this option are reduced substantially as it would only apply to relatively few developments in the district.
<b>Renewable Energy (for all end uses)</b>		
Question SUS10: Option 1: No requirement	+ 4	There are limited benefits of this option because building regulations will still apply and should result in reduced energy usage and the need for some renewable energy use.
SUS10: Option 2: national or regional requirement	+ 5 – 1	There are benefits of more renewable energy use, but this could have a negative impact on the landscape and townscape.
SUS11: Option1: No requirement for decentralised renewable energy.	+ 3 – 3 ? 1	There will still be renewable energy used under the building regulations and this will increase over time, but this will have a negative effect on climate change related issues.
SUS11: Option2: At least 25% decentralised renewable energy.	+ 7 – 1	There are now considered to be more benefits of this option as it would have a positive effect on problems created by climate change. There is likely to be an adverse impact on the landscape or townscape.
SUS12: Option1: Applies to all developments	+ 9 – 1	It is considered that in the long run this will have benefits for the economy but there will be initial capital costs. There will also be a beneficial effect on problems caused by climate change. Landscape and townscape could be adversely affected.
SUS12: Option2: Above 1	+ 5	There are benefits from this option but they

Option	Key Results	Comments
dwelling or 100 sq m non-residential floorspace	– 1	are more limited, and they could still have an adverse impact on townscape or landscape.
<b>Section 9: Retail and Town Centres</b>		
Question R2: Option 1: Business as usual	+21	There are a variety of benefits to this option, including providing local jobs and opportunities for local business as well as cutting down the need to travel by car.
Question R2: Option 2: Promote and enhance local and town centres	+21	The benefits for this option are similar to the above option but over time if it is properly implemented there could be stronger benefits. This will of course depend on the correct strategy and having sufficient resources.
Question R2: Option 3: Retail and management strategy for Sudbury and Hadleigh town centres	+15 -4	This option focuses on the town centres but potentially neglects the smaller local centres; which could decline with all the attendant consequences, such as the need to travel greater distances for shops and reduced satisfaction with a neighbourhood.
<b>Section 10: Social &amp; Community Infrastructure</b>		
<b>Sport and Recreation Facilities including Green infrastructure</b>		
Question SC12: Should green infrastructure be considered in policy documents? (Either Core Strategy or Development Control Policies)	++ 2 + 2	Green infrastructure should be considered, but SA does not show clearly whether it would be best placed in Core Strategy policies or Development Control Policies.
<b>Delivery of Community and Social Infrastructure</b>		
Question SC13: Option 1: All of equal importance	++ 1 + 11	This option ensures that developments are supported by a balanced and wide range of facilities.
Question SC13: Option 2: Some of greater importance than others	++ 2 - 9 ? 2	This option is beneficial for specific facilities- i.e. those which are considered more important- but then leads to weaker access to other facilities which could lead to other issues.
Question SC14: Option 1: Threshold applied above which contributions required	+ 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 also that rural development (infill etc) may contribute to demand but not require contributions for services. If the threshold is too high we might miss out on contributions where they are needed.

Option	Key Results	Comments
<b>Question SC14: Option 2: S106/case by case assessment</b>	<b>++ 2</b> <b>+ 6</b>	Based on local need on a case by case basis.
<b>Question SCI 5: That the provisions of SCI should be addressed through either Core Strategy or Development Control Policies documents.</b>	<b>++ 4</b> <b>+ 7</b>	Provision for Social & Community Infrastructure in the new documents scored highly.
<b>Section 11: Physical Infrastructure</b>		
<b>Provision of Physical Infrastructure</b>		
<b>Question INF2: Option1: BAU- secure infrastructure through case by case assessment- s106</b>	<b>++ 4</b> <b>+ 7</b> <b>-- 1</b>	Ensure correct ones at correct levels but reactive and difficult to coordinate significant funding projects
<b>Question INF2: Option 2: Implement a tariff based approach</b>	<b>++ 3</b> <b>+ 8</b> <b>- 1</b>	May not get contributions from smallest developments even where development increases the demand for infrastructure. Reactive and could be difficult to coordinate larger projects.
<b>Question INF2: Option 3: Make provision for large scale infrastructure requirements</b>	<b>++ 7</b> <b>+ 8</b> <b>? 1</b>	Would need to be used in conjunction with more local measures for contributions and consideration of softer infrastructure More proactive than first two options on their own.
<b>Option 4: Secure grant funding from national government for bigger projects.</b>	<b>++ 8</b> <b>+ 7</b> <b>? 1</b>	Similar to above (option 3)

## The Way Forward

Babergh District Council will consider all the responses it has received on the Core Strategy Issues and Options report, including those to the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the options. The scores here may be amended following comments from the public or organisations with an interest in the process. There will also be comments on the issues and the options themselves and the Council will have to consider these and decide on which options are preferred.

The next stage is to identify the Council's preferred options/ draft policies; this will cover the topic areas in the consultation document and should represent the best choice having regard to the consultation responses, the evidence base supporting the Core Strategy, government guidance and the sustainability issues raised. The SA and SEA will form an important part of the decision making process and any significant weakness identified will have to be satisfactorily addressed in the preferred options. Where possible,

strengths identified can also be reinforced through the later stages of the document's development.

When the Preferred Options/ Draft Policies for the Core Strategy are selected (planned to be late 2009) another SA/SEA will be completed for these Preferred Options/ Draft Policies. This will of course involve fewer assessments and will be a shorter document, but it will also have to justify why the other options have been rejected. Comments on the results of this SA and SEA are welcomed within the timescales of the consultation period and will be considered as part of the Core Strategy development process.

### **How to comment**

We welcome comments and views on the SA and SEA and this will be open for a six week period:

- Start date Tuesday the 12<sup>th</sup> May 2009 and ending 23<sup>rd</sup> June 2009 at 5pm

Representations can be made:

- Online on the Council's website [www.babergh.gov.uk](http://www.babergh.gov.uk) under 'planning and building control' and then 'local development framework'
- Or emailed to [ldf@babbergh.gov.uk](mailto:ldf@babbergh.gov.uk)
- Or paper responses can be sent to Babergh District Council, Planning Policy Team, Corks Lane, Hadleigh, Ipswich, Suffolk, IP7 6SJ