

Babergh District Council Local Development Framework

Core Strategy Submission Draft

Sustainability Appraisal Report

Main Report
September 2011

Babergh District Council Local Development Framework Core Strategy Submission Draft Sustainability Appraisal Report Main Report

September 2011

Notice

This report was produced by Atkins and Babergh District Council for the specific purpose of the Submission Core Strategy Development Plan Document Sustainability Appraisal.

This report may not be used by any person other than Babergh District Council without Babergh District Council's express permission. In any event, Atkins accepts no liability for any costs, liabilities or losses arising as a result of the use of or reliance upon the contents of this report by any person other than Babergh District Council.

Document History

JOB NUMBER: 5088144			DOCUMENT REF: Babergh Core Strategy SAR_V4.0.doc			
4	Final	OP	OP	CW	CW	30.09.11
3	Revised Final Draft for Comment	EB/OP	OP	CW	CW	17.06.11
2	Final	OP/SM	OP	CW	CW	01.06.10
1	Draft for Comment	CS/OP/SM	OP	AG		12.04.10
Revision	Purpose Description	Originated	Checked	Reviewed	Authorised	Date

Contents

Section	Page
Glossary	vi
Non-Technical Summary	1
The Process Followed	1
Babergh District Core Strategy	1
Review of Relevant Plans, Policies and Programmes	2
Sustainability Baseline and Identification of Key Issues	2
Sustainability Appraisal Framework	4
Relationship with Habitats Regulations Assessment	5
Compatibility between Core Strategy and SA Objectives	5
Plan Issues and Options	5
Broad Locations Assessment	6
Assessment of Growth Options	6
Assessment of Submission Core Strategy Policies	7
Mitigation Measures	9
Monitoring	9
Conclusions	10
1. Introduction	12
Local Development Framework	12
Babergh District Core Strategy	12
Geographical Area	15
Requirement for Sustainability Appraisal	17
Requirement for Strategic Environmental Assessment	18
The SA Process	18
Purpose of the SA Report	20
Suffolk Sustainability Appraisal Group	21
Programme and Responsibility	22
Consultation	23
Relationship with Habitats Regulations Assessment	23
2. Sustainability Appraisal Methodology	25
Overview of Approach	25
Stage A: Setting the Context and Objectives, Establishing the Baseline and Deciding on Scope	25
Stage B: Developing and Defining Options	27
Stage C: Preparing the Sustainability Appraisal Report	31
Stage D: Consulting on the Draft Plan and Sustainability Appraisal Report	32
Meeting the requirements of the SEA Directive	32
3. Other Relevant Plans and Programmes	33
Introduction	33
Review	41
4. Baseline	42
Introduction	42
Baseline Data Collection	42

Baseline Information	42
5. Key Sustainability Issues	52
Introduction	52
Results	52
6. Sustainability Appraisal Framework	55
Introduction	55
Babergh District Council Core Strategy SA Framework	55
7. Compatibility Assessment	65
8. Issues and Options	71
9. Broad Locations Assessment	95
Assessment Results	103
10. Growth Scenarios	109
Introduction	109
Results of the Assessment of the Growth Scenarios	109
Assessment Summaries and Recommendations	112
11. Assessment of Draft Submission Core Strategy Policies	118
Introduction	118
Results of the Assessment of the Policies	137
Assessment Summaries and Recommendations	138
Cumulative, Synergistic and Indirect Effects	153
Council Response to SA Recommendations	156
12. Mitigation	164
13. Monitoring	165
14. Conclusions	175
15. References	177

List of Tables

Table 1.1 - Incorporating SA in the DPD Preparation Process	20
Table 1.2 - Key SA Tasks and Outputs	22
Table 2.1 - Key to Compatibility of Objectives	27
Table 2.2 – Scoring of Policy Options Assessment	28
Table 2.3 - Key to Broad Locations Assessment	29
Table 2.4 - Scoring of Growth Options and Policies Assessment	29
Table 2.5 - Schedule of SEA Requirements	32
Table 3.1 – Relevant Plans and Programmes	33
Table 4.1 – Social Sustainability Issues	43
Table 4.2 – Environmental Sustainability Issues	48
Table 4.3 – Economic Sustainability Issues	51
Table 5.1 – Key Sustainability Issues	52
Table 6.1 – SA Framework	56
Table 7.1 - Compatibility Assessment between the Core Strategy Objectives and the SA Objectives	67
Table 8.1 – Key to Scoring for Issues and Options Assessment	71
Table 8.2 – Summary of Assessment	72
Table 9.1 - Broad Locations Assessment Framework	97

Table 9.2 - Summary of Assessment Results for Broad Locations	105
Table 10.1 - Summary of Significance of Direct Effects of Growth Options	110
Table 11.1 – Assessment Policy Components	120
Table 11.2 - Summary of Significance of Direct Effects of the Draft Submission Core Strategy Policies (June 2011)	137
Table 11.3 – Number and Distribution of New Homes in Draft Submission Core Strategy	138
Table 11.4 - Cumulative, Synergistic and Indirect Effects	153
Table 11.4 - SA Recommendations and Council Response- Submission Draft Core Strategy June 2011	156
Table 13.1 - SA Objectives with Identified Significant Effects	165
Table 13.2 – Proposed Monitoring Programme	167

List of Figures

Figure 1.1 – Geographical Context	15
Figure 1.2 – Wards and Parishes	16
Figure 2.1 – Relationship between SA Stages and Tasks	26
Figure 4.1 - Map of the Natural Environment of Babergh District	46
Figure 4.2 - Map of the Built Environment of Babergh District	47
Figure 9.1 - Key Diagram in Growth Scenarios and Broad Locations Core Strategy	102
Figure 11.1 – Babergh Key Diagram	136
Figure 11.3 – Energy Hierarchy	148

Appendices (separate volume)

Part I

Appendix A - Baseline Information and Identification of Sustainability Issues

Appendix B - List of documents produced by SSAG for use of Suffolk Authorities in producing their Scoping Reports for the Sustainability Appraisal of LDFs

Appendix C - Early indicators and objectives for the SA framework produced by SSAG

Appendix D - Responses from early informal consultations regarding common framework for SEA for Suffolk

Appendix E - Responses to Consultation on SA Scoping Report

Part II

Appendix A - Issues and Options Assessment and Consultation Responses

Part III

Appendix A - Broad Locations Assessment

Appendix B – Growth Scenario Assessment Tables

Appendix C – Responses to Consultation on Growth Scenarios and Broad Locations Core Strategy

Appendix D – Draft Submission Core Strategy Policies Assessment Tables

Appendix E – Council Response to SA Recommendations

Glossary

Term	Meaning/Definition
AMR	Annual Monitoring Report
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
BDC	Babergh District Council
BREEAM	Building Research Establishment Environmental Assessment Method
CEEQUAL	Civil Engineering Environmental Quality Assessment
CfSH	Code for Sustainable Homes
CIL	Community Infrastructure Levy
CO ₂	Carbon Dioxide
CS	Core Strategy
CWS	County Wildlife Site
DCLG	Department of Communities and Local Government
DPD	Development Plan Document
IMD	Index of Multiple Deprivation
LDD	Local Development Document
LDF	Local Development Framework
LNR	Local Nature Reserve
LPA	Local Planning Authority
NNR	National Nature Reserve
ODPM	Office of the Deputy Prime Minister
ONS	Office of National Statistics
PDL	Previously Developed Land
PM ₁₀	Particulate Matter up to 10 micrometers in size
PPG	Planning Policy Guidance Note
PPPs	Plans, Programmes and Policies
PPS	Planning Policy Statement
RPG	Regional Planning Guidance
SA	Sustainability Appraisal
SM	Scheduled Monument
SEA	Strategic Environmental Assessment
SHLAA	Strategic Housing Land Availability Assessment

Term	Meaning/Definition
SBI	Site of Biological Interest
SPD	Supplementary Planning Document
SSAG	Suffolk Sustainability Appraisal Group
SSSI	Site of Special Scientific Interest
SUDS	Sustainable Drainage Systems
WCS	Water Cycle Study

Non-Technical Summary

This is the non-technical summary of the Sustainability Appraisal (SA) Report, setting out the SA process for the Babergh District Council (BDC) Core Strategy Submission Draft document. This document builds upon SA work previously undertaken and set out in the Local Development Framework SA Scoping Report (prepared in 2007) and SA Report prepared for the Core Strategy Issues and Options document (2009) and Growth Scenarios and Broad Locations document (2010).

This SA Report has been prepared to fulfil the requirements for SA arising from the Planning and Compulsory Purchase Act 2004 and the requirements for Strategic Environmental Assessment (SEA) arising from the SEA Directive. The purpose of SA is to promote sustainable development through better integration of sustainability (economic, social and environmental) considerations in the preparation and adoption of plans. The SEA Directive requires that certain plans and programmes undergo an environmental assessment, due to the likelihood that they will have significant environmental effects once implemented.

The Process Followed

The SA process has involved four main stages to date with a number of consultations held in various occasions:

- **Stage A** – Setting the context and objectives, establishing the baseline and deciding on the scope of the sustainability appraisal. Preparing and consulting on 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 (2011); and
- **Stage D** – Consulting on Issues and Options Initial SA Report (2009), Growth Options and Broad Locations SA Report (2010); and Core Strategy Submission Draft SA Report (this report).

Babergh District Core Strategy

BDC is preparing a Core Strategy DPD, which will form part of the Council's Local Development Framework (LDF). The Core Strategy is the strategic planning policy document that will set out the approach for managing growth and development in Babergh District to 2031. The Strategy seeks to reflect BDC's spatial vision for the District, which is:

"Babergh will continue to be an attractive, high quality place in which to live and work and to visit. The local character and distinctiveness of South Suffolk will be further enhanced by a strong economy and healthier environment providing the framework for a well connected network of settlements that is made up of mixed and balanced communities".

Eight objectives are set out in the Core Strategy to underpin this Vision. The objectives aim to ensure that the DPD supports BDC's vision and meets local, regional and national planning requirements:

Objective 1: Enable – mixed and balanced communities/ comprehensive neighbourhoods

Objective 2: Support economic growth and prosperity, building on the strengths of the local economy, including strengthening the role of the rural economy.

Objective 3: Facilitate – regeneration and renewal

Objective 4: Ensure provision of adequate infrastructure to support new development

Objective 5: Encourage/ Promote – adapting to climate change, resource efficient use of land and infrastructure

Objective 6: Protect / conserve and enhance: local character; built, natural and historic environment including biodiversity, landscape, townscape; shape & scale of communities; the quality and character of the countryside; and treasured views of the district.

Objective 7: Support Rural Communities, local services and facilities

Objective 8: Manage and deliver development in a phased way so that growth is incremental and delivered at the appropriate time.

The Core Strategy spatial vision and objectives will be delivered through 18 policies relating to key areas of change and designed to steering the future development of the area. The policies are:

- CS1 Settlement Pattern Policy
- CS2 Strategy for Development and Distribution of Growth
- CS3 Strategy for Sudbury/Great Cornard
- CS4 Strategy for Hadleigh
- CS5 Strategy for Growth in Babergh's Ipswich Fringe
- CS6 Criteria for development in Core and Hinterland Villages
- CS7 Reducing carbon dioxide emissions
- CS8 Renewable Energy
- CS9 Green Infrastructure
- CS10 Sustainable Development
- CS11 Town, village and local centres
- CS12 Local Economic Strategy
- CS13 The Rural Economy
- CS14 Mix and Types of Dwellings
- CS15 Affordable Housing
- CS16 Rural Exception Sites
- CS17 Infrastructure Provision
- CS18 Monitoring

Review of Relevant Plans, Policies and Programmes

A review of all relevant plans, policies and programmes (PPPs) was undertaken based upon the list of relevant PPPs identified by Suffolk Sustainability Appraisal Group (SSAG) and developed for the individual nature of Babergh, and identified the relationships between the SA and plans and programmes which, in turn, has enabled potential synergies to be exploited and, conversely, conflicting initiatives to be identified. This has informed the identification and development of relevant sustainability objectives to be used for the assessment process through the SA Framework.

Sustainability Baseline and Identification of Key Issues

Collation and analysis of key baseline information for the District enabled a number of key sustainability issues to be identified in the Core Strategy. These are briefly summarised below:

Role of market towns and urban fringe in the district

There are two market towns of Sudbury and Hadleigh in the district. They include the largest concentration of population in the district and provide a range of services and facilities to large rural catchment areas including employment, retail, leisure, health and education, other community facilities and physical

infrastructure to support these. The towns in the Babergh district are of particular importance to the future vitality and viability of the district. The district also includes a part of the urban fringe of Ipswich, an important urban area that provides for most of the key services in this part of the district.

Rural character, the importance of towns and larger villages and access to services and facilities

Babergh is predominantly rural in character with many small villages that have limited services and facilities. These smaller villages depend on the larger villages and town centres in the district to provide for many of their day-to-day needs. It is important that the services and facilities of the villages in the district are safeguarded as well as recognising the important role of larger villages in the district.

Improve sustainability and 'self-containment'

In a rural area such as Babergh it is difficult to achieve a reduction in car travel, as for many people in small villages/ countryside public transport will not replace the need to own and run a car. There is a requirement to reduce the need to travel by ensuring new development is located close to services and facilities and that these developments are carefully planned to provide opportunities for work and leisure etc. close to new homes.

Limited brownfield land

The rural character of and settlement pattern of Babergh, with only two market towns (of limited size) and a part of the Ipswich fringe built up area, mean that the supply of brownfield land for re-development within the district is very limited. The prioritisation of brownfield development land has led to significant pressure to redevelop the district's scarce employment land supply for residential redevelopment. The re-use of brownfield land has to be carefully considered to ensure the sustainable development of the district and achieving a balance between social, economic and environmental issues.

Ageing population

The population in Babergh is an ageing population. This places pressure on local health services and other services, as well as underlining the importance of ensuring that the needs of the elderly population are addressed.

Need for affordable housing

Income in relation to house prices continues to mean that affordability in the district remains a problem and that there is a large need for affordable housing throughout the district.

Need to sustain the economy and achieve the right balance between highly skilled and low skilled jobs

Babergh is an economically diverse area, and economic activity rates in Babergh compare favourably to national and regional rates. It is important that the Core Strategy contributes to sustaining and promoting the economy in the district, particularly since a large proportion of the workforce work outside of the district. Income rates and the level of highly qualified inhabitants are below regional and national averages and it is considered necessary to improve the balance between highly skilled and low skilled jobs in the district.

Strengths of the economy

It is important to recognise the drivers and existing strengths of the local economy and identify the potential for future new businesses and employment opportunities in the district.

The ports of Felixstowe and Harwich, whilst not within the district, are major economic drivers for Babergh and are providers of jobs for many Babergh residents. The ports could also potentially benefit Babergh's economy through related employment generating development within the district, and the associated improvements in infrastructure.

The attractive landscape, estuaries, and coastline combine with the historic towns and villages in the district form the base of an important cultural and historic leisure and tourism sector. Businesses in this sector are important contributors to the local economy. There is also a significant agricultural base in the district.

Climate change

CO₂ levels of emissions in the Babergh District are above regional and national levels. In addition, the East of England region is particularly vulnerable to the effects of climate change. It is therefore important to examine ways of reducing climate change in the district.

Exceptional natural, historic and built environments

The district has a varied and attractive landscape, including several areas of importance to nature conservation. The district also has a prestigious historic environment, of outstanding character and quality. The value of the natural and built environment in the District forms the basis for a strong local tourism industry. Protection and enhancement of the natural, historic and built environments in the Babergh District, whilst planning for growth, will be important.

Infrastructure constraints

New development should be supported by appropriate infrastructure to ensure that our communities are sustainable and healthy. It is therefore important that infrastructure needs are considered together with how new development will be accommodated in the district.

Water issues

Some water quality issues have been identified within the District. Phosphorous levels are high and most watercourses classified as having 'moderate' ecological status. Two environmentally designated sites - Cattawade Marshes and Cornard Mere - have been identified as currently being in unfavourable condition due to water cycle processes. Several wastewater treatment works have no available headroom or are at capacity. Both groundwater sources have also been assigned an overall status of 'poor'

Sustainability Appraisal Framework

The Sustainability Appraisal Framework is a key tool in completing the SA as it allows the assessment of the effects arising from the Core Strategy proposals in key areas to be assessed in a systematic way. A SA Framework containing objectives and associated indicators has been developed using an iterative process, based on the review of relevant PPPs, the evolving baseline, analysis of key sustainability issues and consideration of which of these issues can potentially be addressed by the Core Strategy. The SA Framework has been revised following the consultation on the LDF SA Scoping Report.

The SA objectives are as follows:

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
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 townscape
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

Relationship with Habitats Regulations Assessment

There is a requirement for any policies, plans or projects with potential to affect European sites to undergo Habitats Regulations Assessment (HRA) under the European Habitats Directive. There are a number of European sites within the District and located close to its boundaries. Therefore, an HRA of BDC's Core Strategy is required.

A Stage I HRA preliminary review of the BDC Issues and Options Core Strategy Report was undertaken by Atkins in October 2009. This identified that there may be likely significant effects on the conservation objectives and integrity of nine European Sites arising from the development of the broad locations identified for future growth in the Issues and Options Core Strategy. A more detailed Stage II HRA Screening of the Submission Core Strategy document has been undertaken. Its findings have been considered in this SA Report.

Compatibility between Core Strategy and SA Objectives

In order to ascertain the overall sustainability of the approach proposed for the Core Strategy, the Core Strategy Objectives have been tested against the SA Objectives to gauge their compatibility. Overall the Submission Draft Core Strategy objectives were compatible with the sustainability objectives, with the exception of objectives, 1, 2 and 3 which show possible conflict. These objectives make provision for development of mixed and balanced communities, new land for provision of housing and employment, regeneration and renewal, including encouraging economic, leisure and retail growth. Any objectives promoting growth and development opportunities, by their very nature, will inevitably have the potential for conflict with environmental objectives.

There is potential for predicted conflicts to be mitigated by careful site selection and the implementation of other Core Strategy objectives that aim to safeguard the built and natural environment, achieve sustainable development and provide infrastructural improvements.

Plan Issues and Options

The Core Strategy Issues and Options paper, published for consultation in April/May 2008, set out a range of key issues that the DPD aims to address. These issues were grouped under eight main policy themes:

- Spatial Strategy for Babergh District;
- Housing;
- Economy and Employment;
- Built and Natural Environment;
- Sustainability and Climate Change;
- Retail and Town Centres;
- Social and Community Infrastructure; and
- Physical Infrastructure.

For each issue, the Issues and Options paper set out a number of strategic options. The SA tested the performance of the strategic options for each issue against the SA objectives. The assessment revealed varying degrees of sustainability performance across the options, with some leaning more toward one particular dimension of sustainability (social, environmental or economic) than others.

BDC has considered all of the consultation responses received on the Core Strategy Issues and Options report, including those related to the SA of the Core Strategy Issues and Options document. These comments, as well as the comments on the issues and the options themselves, were taken into consideration in the development of the Submission.

Broad Locations Assessment

Nine broad locations for new development were identified in the Growth Options Core Strategy document and were subject to an assessment in order to determine their performance in sustainability terms, with reference to social, environmental and economic factors. These locations represent urban extensions of Sudbury (4 broad locations), Hadleigh (3 broad locations) and Ipswich (two broad locations).

For the assessment of the broad locations there was a need to devise location specific SA criteria to cover, for example, accessibility to schools, healthcare facilities and other community services, accessibility to public transport routes, opportunities to promote non-motorised transport modes, identify specific environmental constraints and establish the proposed uses for each of the broad locations.

In general, the broad locations have been found to perform with a comparable level of positive effects against a number of the SA objectives. All of the broad locations perform well against the social SA objectives mainly as a result of their good accessibility to the key services and facilities by public transport, including health care facilities, schools, employment, supermarkets and shopping areas. The assessment against the SA environmental objectives provides the most differentiation between the broad locations. Potential effects relate to the proximity of sites to flood risk areas; ecological designations; heritage designations; and landscape designations. All of the broad locations perform equally well against the SA economic objectives as a result of accommodating employment and other uses and providing good connections to encourage efficient patterns of movement in support of economic growth as outlined above.

Overall, broad location 5, which is to the north of Sudbury, is deemed to perform the best in sustainability terms. Broad location 6, east of Sudbury, despite being located relatively close to an SSSI (the Edwardstone Woods), is also rated well overall in sustainability terms. Broad location 1, east of Hadleigh, is associated with comparatively lower level of constraints as well. Broad locations 2 and 9, west of Hadleigh and South West Ipswich Fringe, perform least favourable overall in sustainability terms, having the highest number of the environmental constraints. Broad location 4, west of Sudbury, is also significantly constrained.

The rest of the broad locations (locations 3, 6, 7 and 8) have a comparable level of constraints identified. However, it is believed that the size of each of the broad locations offers the potential for avoiding or mitigating most of the possible negative effects.

Assessment of Growth Options

The Babergh Growth Options Core Strategy document set out eight growth scenarios, four housing growth scenarios and four employment growth scenarios. These options were assessed to predict and evaluate the nature (positive, negative or neutral), scale (significant or non-significant), permanence (temporary or permanent), certainty (low, medium or high) and timeframe (short-term, medium-term or long-term) of the predicted social, environmental and economic effects. Comments were made against each of the SA Objectives that comprise the SA Framework.

Considered overall, the scenarios within the BDC Growth Options Core Strategy were predicted to have a range of sustainability effects. Positive effects were predicted against the social and economic indicators. Several negative effects were predicted against environmental objectives. Potential exists to mitigate the negative effects through detailed policies and site specifics. Moderately to strongly significant effects were predicted against the following SA objectives:

- To maintain and improve levels of education and skills in the population overall (Positive);
- To reduce poverty and social exclusion (Positive);
- To improve access to key services for all sectors of the population (Positive);
- To offer everybody the opportunity for rewarding and satisfying employment (Positive);
- To meet the housing requirements of the whole community (Positive);
- To conserve soil resources and quality (Negative);
- To reduce the effects of traffic on the environment (Negative);
- To reduce emissions of greenhouse gases from energy consumption (Negative);
- To conserve and enhance biodiversity and geodiversity (Negative);
- To achieve sustainable levels of prosperity and economic growth throughout the plan area (Positive);
- To revitalise town centres (Positive);
- To encourage efficient patterns of movement in support of economic growth (Positive); and
- To encourage and accommodate both indigenous and inward investment (Positive).

Overall, Employment Scenarios 2 and 3 were deemed to have the most moderately to significant positive sustainability benefits, but these scenarios were also predicted to have a few moderately to significantly negative effects. Scenario 1 was associated with some moderately significant positive effects and no moderately to significantly negative effects. Scenario 4 showed the most positive effects and no significantly negative effects but it also has the least moderately to significant positive effects. The significance of the predicted positive and negative effects could potentially increase in Scenario 4 depending on the exact numbers that will be provided for the scenario. Negative effects predicted for the four employment scenarios could potentially be mitigated or positive effects enhanced by including policies in the Submission Core Strategy, Site Specific Allocations and the Development Management DPDs to address the mentioned sustainability aspects.

Overall, Housing Scenario 1 was associated with the most sustainability benefits (including the most moderately to significantly positive effects) although a few moderately significant negative effects were also been identified. Scenario 3 and Scenario 4 showed similar sustainability effects and no moderately to significant positive or negative effects were identified for these scenarios. The most moderately to significantly negative effects were identified for Scenario 2 although a few moderately positive to significantly positive effects were also identified for Scenario 2. Negative effects for the four housing scenarios could potentially be mitigated or positive effects enhanced by including policies in the Submission Core Strategy, Site Specific Allocations and the Development Management DPDs to address the mentioned sustainability aspects.

Assessment of Submission Draft Core Strategy Policies

The Core Strategy policies seek to implement the Core Strategy vision and objectives. The Babergh Core Strategy Submission Draft sets out 18 policies. The first iteration of SA of the policies was undertaken on an earlier version of the Core Strategy dated May 2011 which contained 17 policies. These policies were grouped by theme, based on similar aims and objectives, into 9 components for assessment. Although the policies within each component were assessed simultaneously, their key features have been noted and recommendations have been made for individual policies where necessary. The policies were grouped under the following component themes:

1. Spatial Strategy: Levels of Growth and its Distribution
2. Strategy for Sudbury/Great Cornard
3. Strategy for Hadleigh

4. Strategy for Growth in the Ipswich Fringe
5. Strategy for development in Core and Hinterland Villages
6. Sustainable Development and Climate Change
7. Economy
8. Mixed and Special Needs Housing and Exception Sites
9. Infrastructure Provision

The policies under these components were subject to SA to predict and evaluate the nature (positive, negative or neutral), scale (significant or non-significant), permanence (temporary or permanent), certainty (low, medium or high) and timeframe (short-term, medium-term or long-term) of the predicted social, environmental and economic effects. Appraisal comments have been made against each of the SA Objectives that comprise the SA Framework.

Policy CS11 (Town, Village and Local Centres) has been added to the Core Strategy document later in the process after the first iteration of the policies' appraisal. This policy does not introduce fundamentally novel elements to the Core Strategy. It fosters development in Sudbury, Hadleigh, the Ipswich urban fringe at Copdock, in village and local centres and in the New Directions of Growth through the protection of their vitality and viability and opportunities to enhance facilities at an appropriate scale. Development in these areas has been assessed through the relevant Policies CS1-CS6 and the SA findings for these policies are applicable for Policy CS11. Further, this policy itself includes a safeguard, requiring an assessment of new town centre uses on the character and function of the centre, anti-social behaviour and crime, the amenities of nearby residents, as well as on town centre vitality and viability. Therefore, it has been deemed that a separate assessment of the policy is not required.

Policy CS18: Monitoring has not been assessed against the SA objectives, as its purpose (the monitoring of the Core Strategy implementation) does not influence development directly. This policy has been considered in the preparation of the SA monitoring framework.

Considered overall, the policies within the BDC Submission Core Strategy are predicted to have a range of sustainability effects, most of which are positive. Significant effects were predicted against the following SA objectives:

SA Objective against which a significant effect has been predicted	Nature of effect
1. To improve the health of the population overall	Positive
2. To maintain and improve levels of education and skills in the population overall	Positive
3. To reduce crime and anti-social activity	Positive
4. To reduce poverty and social exclusion	Positive
5. To improve access to key services for all sectors of the population	Positive
6. To offer everybody the opportunity for rewarding and satisfying employment	Positive
7. To meet the housing requirements of the whole community	Positive
8. To improve the quality of where people live and to encourage community participation	Positive
9. To improve water and air quality	Positive
11. To conserve soil resources and quality	Negative
12. To use water and mineral resources efficiently, and re-use and recycle where possible	Positive and Negative

SA Objective against which a significant effect has been predicted	Nature of effect
13. To reduce waste	Positive
15. To reduce emissions of greenhouse gases from energy consumption	Negative
16. To reduce vulnerability to climatic events	Positive
17. To conserve and enhance biodiversity and geodiversity	Positive and Negative
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Negative
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	Positive
21. To revitalise town centres	Positive
22. To encourage efficient patterns of movement in support of economic growth	Positive
23. To encourage and accommodate both indigenous and inward investment	Positive

Recommendations in terms of broadening aspects covered by particular policies or strengthening their requirements have been provided during the SA process to temper potential negative effects identified and enhance positive ones. Furthermore, the nature of the Core Strategy is such that planning applications are considered against the Plan as a whole – therefore the joint application of all the policies will offer the potential for offsetting negative effects associated with particular policies.

Mitigation Measures

Although the Core Strategy will have a positive significant effect in sustainability terms overall, certain policies have been identified as offering potential for mixed, minor or significant negative effects, as outlined above.

The SA Report recommends a number of mitigation measures aimed at preventing, reducing or offsetting significant adverse effects that have been identified. These consider mitigation measures that are relevant to specific policies and relate mainly to strengthening their wording by removing ambiguity and improving clarity, broadening scope to cover more sustainability aspects and including more stringent requirements. Mitigation through setting out recommendations for forthcoming relevant local guidance documents (e.g. Development Management and Site Allocations DPDs) has also been considered in the assessment process.

Monitoring

Monitoring the predicted significant sustainability effects of implementing the Core Strategy will be an important ongoing element of the SA process. SA monitoring covers significant social, economic and environmental effects and it involves measuring indicators which will enable a better understanding of the causal links between the implementation of the plan and the likely significant sustainability effects (both beneficial or adverse) being monitored. This will allow the identification of any unforeseen adverse effects and enable appropriate remedial action to be taken.

The SA Framework contains indicators that have been used as the basis for preparing the monitoring programme, bearing in mind that it will not always be necessary to collect data for all the indicators and that there are already some similarities between the indicators proposed in the Core Strategy and the indicators

identified by the SA. Potential indicators for monitoring of the identified significant effects will be established as part of the preparation of the revised SA report for the Submission Core Strategy document (the next iteration of the SA Reporting process), and will be incorporated into the Annual Monitoring Report (AMR) for the LDF.

Conclusions

This SA Report documents the SA process and its key findings for the Core Strategy. The report builds upon SA work undertaken previously as part of the preparation of the LDF SA Scoping Report and appraisal of the strategic alternatives of the Issues and Options and Growth Scenarios and Broad Locations documents.

The latest assessment indicates that the Core Policies within the Babergh District Council Core Strategy Submission Draft generally meet the range of sustainability objectives identified in the SA Framework. The Core Policies are considered to offer potentially significant positive effects on all SA social and economic objectives and on some environmental ones. This specifically relates to the SA social objectives concerned with public health, accessibility for all to key services and facilities, opportunities for housing and employment, social inclusion and cohesion. Significant positive effects are also expected against economic SA objectives concerned with sustainable levels of prosperity, revitalisation of town centres, efficient patterns of movement in support of economic growth and investment.

Significant positive effects are also likely to arise in respect of the SA environmental objectives aiming, reduce waste and vulnerability to climatic events. A mix of significant positive and significant negative effects has been predicted against the environmental objectives on water and mineral resources efficiency and protection of biodiversity. Negative effects against these objectives are associated with constraints in terms of water supply and water treatment capacity as specified in the Water Cycle Study and with potential effects on ecological designations.

On the positive side, strong features of the Core Strategy from the sustainability perspective include the following:

- Policies included under assessment component 6 (Sustainable Development - Planning for Climate Change). A large number of the benefits can be attributed to the Policies 10, 7 and 8,, which set out planning-based elements of delivering more sustainable forms of development, requirements for adherence to the Building for Life and BREEAM design standards and requirements for the provision of low and zero carbon energy. Specifically, compliance with the design standards requires the incorporation and demonstration of such sustainability measures as high energy performance, water conservation, use of recycled materials or materials with a low impact on the environment, promotion of carbon friendly transport modes and sustainable waste management and minimisation of ecological effects.
- Policy CS9: Green Infrastructure promotes a network of multi-functional Green Infrastructure within and between urban and rural areas which creates potential for multiple benefits in such areas as public health, accessibility by sustainable modes, connectivity between biodiversity habitats and adaptation to changing climate.
- Policy CS17 relating to Strategic Infrastructure aims to ensure that a sufficient level of services and facilities are provided for communities. In particular, it specifies improvements to health and educational facilities.

Significant negative effects have been identified against the environmental objectives 11 (soil resources), 15 (emissions of GHG) and 19 (landscape quality). This is explained by the amount of new development to be delivered during the Core Strategy period and its implications in terms of greenfield land take, pressures placed on the landscape, embodied carbon in new development and operational use of energy. In addition, the rural nature of the District makes it challenging to foster a shift towards more sustainable transport modes.

As a result of assessment recommendations, the Council have further refined the wording of the policy content in the Core Strategy Submission Draft, taking into account recommendations arising from both the SA and HRA processes as they developed.

Overall, as a result of the incorporation of the HRA and SA recommendations, the sustainability performance of the Core Strategy has been increased.

Where recommendations arising from the SA were not implemented by the Council, explanations as to why this is the case have been provided. These responses are acceptable from an SA perspective. In relation to other, more specific, recommendations it has been confirmed that the Council will consider them during the preparation of lower tier specific policy documents, e.g. Site Allocations and Development Managements DPDs. Only one SA recommendation in relation to Policy CS7 'Helping to reduce carbon dioxide emissions – design standards' is considered outstanding. Specifically, it is recommended that Policy CS7 should include a reference to Part L1A of the revised building regulations, so its requirements in terms of carbon dioxide emissions reductions are clear. The standards currently referenced in the policy do not include mandatory requirements for carbon dioxide emissions reductions.

Apart from the recommendation outlined above, it is considered that there are no other remaining SA recommendations to the Babergh Core Strategy Submission Draft document.

Finally, the HRA Screening Report (September 2011) concluded that the Babergh Core Strategy Submission Draft is not predicted to have likely significant effects on any European site, either alone or in combination with other plans and projects, subject to Natural England's review.

1. Introduction

Local Development Framework

- 1.1 Local Development Frameworks (LDFs) are to be prepared by Local Planning Authorities (LPAs). LDFs comprise a portfolio of Local Development Documents (LDDs).
- 1.2 The Babergh District LDF includes a Local Development Scheme (LDS) describing the Core Strategy and other Development Plan Documents to be prepared by the LPA including a timetable for their preparation and was adopted in July 2007. It also includes the following LDDs:
- Statement of Community Involvement (SCI) setting out how consultation will be undertaken and in what format. The SCI was adopted in December 2006;
 - The Core Strategy which sets strategic policy across the City which is currently under development;
 - Development Plan Documents (DPDs) which are planning policy documents setting out the Council's approach to a particular issue or area and, at this stage, are intended to include Site Specific Allocations and Development Management Policies DPDs;
 - Supplementary Planning Documents (SPDs) which give more detail to policies in the Core Strategy or other DPDs. The Council has already produced a Safeguarding Employment Land Supplementary Planning Document (adopted in March 2008), an Affordable Housing SPD (adopted in April 2009) and Hamilton Road Quarter (Sudbury Town Centre Redevelopment) SPD (adopted in 11 February 2010).
 - Annual Monitoring Report (AMR)
- 1.3 The Local Development Framework, in time, will replace the Babergh Local Plan, Alteration No 2, for the period 2006 -2016. The Local Plan was adopted in June 2006.

Babergh District Core Strategy

- 1.4 The Core Strategy is a strategic document that sets out the long term spatial vision and strategy for the Babergh District. The production of the Core Strategy has been undertaken in stages, in accordance with national legislation.
- 1.5 In March 2009, an Issues and Options Core Strategy document was published for consultation.
- 1.6 Following receipt of the consultation comments and the abolition of the East of England Regional Spatial Strategy, a second document was produced detailing the Growth Options for the Core Strategy and a public consultation held in October – November 2010.
- 1.7 Following receipt of the consultation comments, the Submission Core Strategy document has been produced detailing the preferred policies, which is the focus of this SA report. The Core Strategy and this SA report will be published for further consultation and thereafter submitted to the Secretary of State.
- 1.8 The Core Strategy seeks to reflect BDC's spatial vision for the District, which is:

"Babergh will continue to be an attractive, high quality place in which to live and work and to visit. The local character and distinctiveness of South Suffolk will be further enhanced by a strong economy and healthier environment providing the framework for a well connected network of settlements that is made up of mixed and balanced communities".

- 1.9 Eight objectives are set out in the Core Strategy to underpin this Vision. The objectives aim to ensure that the DPD supports BDC's vision and meets local, regional and national planning requirements:

Objective 1: Enable – mixed and balanced communities/ comprehensive neighbourhoods

- 1.10 Critical success factors:

- Delivery of 9,700 new jobs and 2,500 new homes by 2031 throughout the district supporting urban and rural areas and meeting the needs of businesses and communities;
- Delivery of a mix of housing types which matches the identified need in each location.

Objective 2: Support economic growth and prosperity, building on the strengths of the local economy, including strengthening the role of the rural economy.

- 1.11 Critical success factors:

- Delivery of well planned strategic mixed use schemes in Sudbury/ Great Cornard, Hadleigh, and Ipswich Fringe;
- Facilitating the right conditions to foster economic growth;
- Protection of existing employment sites and premises;
- Development of strategic and locally important sites implemented during the plan period;
- Maintain and enhance job opportunities in the rural communities to support mixed and balanced communities.

Objective 3: Facilitate – regeneration and renewal

- 1.12 Critical success factors:

- Delivery of a mixed use scheme on the redundant industrial land at Brantham (Policy EM06 of the Adopted Local Plan) through a planned scheme which is well integrated into the existing settlement;
- Redevelopment of the former sugar factory site at Sproughton as a sub-regionally strategic site for port-related and other employment uses;
- Town centre regeneration, particularly to extend or enhance the retail offer, complimentary to the existing vitality and viability of the towns of Sudbury and Hadleigh.

Objective 4: Ensure provision of adequate infrastructure to support new development

- 1.13 Critical success factors:

- The use of a master planning approach to ensure the co-ordination and phased delivery of required infrastructure is planned for in schemes on the larger and strategic sites from the outset;
- The establishment of a Community Infrastructure Levy (CIL) for the Authority;
- Securing contributions either on site, or through financial contributions for the necessary infrastructure to support the new development, as required, site by site.

Objective 5: Encourage/ Promote – adapting to climate change, resource efficient use of land and infrastructure

- 1.14 Critical success factors:

- Evidence of schemes which meet the target reduction in CO2 emissions;
- Brown field sites developed in preference to green field, resulting in a significant amount of development coming forward on brownfield land;

- The number of schemes which demonstrate the use of on site renewables and energy saving initiatives, plus renewable energy generation;
- The number of schemes implemented that demonstrate the use of innovative and/or resource-saving measures such as SuDs and waste management measures.

Objective 6: Protect / conserve and enhance: local character; built, natural and historic environment including biodiversity, landscape, townscape; shape & scale of communities; the quality and character of the countryside; and treasured views of the district

1.15 Critical success factors:

- Strategic sites and other large scale development are well located and designed in relation to the protected areas and most sensitive landscapes;
- The character and context of the landscape/townscape inspires and informs the structure, design and shape of all new, large-scale development. Although the focus will be different for each site important elements are likely to include: landscape form, biodiversity, a design framework based on green infrastructure, and connectivity;
- Enhancement and mitigation is provided where appropriate;
- The scale and character of new development is appropriate to and well integrated into the settlement;
- Development is of a high quality and is of a design which respects the local environment in which it is located, particularly the historic context and character.

Objective 7: Support Rural Communities, local services and facilities

1.16 Critical success factors:

- Key services are retained or improved;
- Rural services are supported in a way which matches the identified need.

Objective 8: Manage and deliver development in a phased way so that growth is incremental and delivered at the appropriate time

1.17 Critical success factors:

- Development within the Strategic sites is phased over the plan period, as outlined in a master plan or other relevant planning delivery framework;
- In Sudbury / Great Cornard phasing ensures that development in the Chilton Mixed Use scheme (Committed development in the Adopted Local Plan) comes forward in the early part of the plan period, and if Chilton is delayed allows for the New Direction of Growth to be implemented sooner;
- Development in other locations respects the cumulative scale of development elsewhere in the settlement and within the functional cluster.

1.18 The Core Strategy spatial vision and objectives will be delivered through 17 policies relating to key areas of change and designed to steering the future development of the area. The policies are:

- CS1 Settlement Pattern Policy;
- CS2 Strategy for Growth and Development;
- CS3 Strategy for Sudbury/Great Cornard;
- CS4 Strategy for Hadleigh;
- CS5 Strategy for Growth in the Ipswich Fringe;

- CS6 Strategy for development in Core and Hinterland Villages;
- CS7 Sustainable Development;
- CS8 Reducing carbon dioxide emissions;
- CS9 Renewable Energy;
- CS10 Green Infrastructure;
- CS11 Local Economic Strategy;
- CS12 The Rural Economy;
- CS13 Mix and Types of Dwellings;
- CS14 Affordable Housing;
- CS15 Rural Exception Sites;
- CS16 Infrastructure Provision;
- CS17 Monitoring.

Geographical Area

- 1.19 The Babergh District is mainly rural in character and covers an area of 230 square miles (596 square kilometres). On its immediate fringes lie the town of Bury St Edmunds to the north, Ipswich to the east and Colchester to the south.

*"The Babergh District was created on the reorganisation of local government from five former local authorities in South Suffolk...Although the name of the District may not generally be known outside East Anglia, many of the towns and villages in the District are nationally known."*¹

- 1.20 Figure 1.1 and Figure 1.2 below show the geographical context of Babergh District as well as its split into wards and parishes.

Figure 1.1 – Geographical Context²



¹ <http://www.south-suffolk.gov.uk/Babergh/Home/About+us/Babergh+Background.htm>

² <http://www.south-suffolk.gov.uk/Babergh/Home/About+us/Babergh+Background.htm>

Figure 1.2 – Wards and Parishes³



³ <http://www.babergh.gov.uk/NR/rdonlyres/D7CC0F22-ACA0-4A67-84E1-052411F0663B/0/pandwmap.pdf>

Requirement for Sustainability Appraisal

- 1.21 Under the Regulations⁴ implementing the provisions of the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is required for all LDDs. The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 removed the requirement for SA for SPDs, although LPAs are still required to screen their SPDs in relation to both SA and Strategic Environmental Assessment (SEA). The purpose of SA is to promote sustainable development through better integration of sustainability considerations in the preparation and adoption of plans. The regulations stipulate that SA of LDDs should meet the requirements of the SEA Directive.
- 1.22 Planning Policy Statement 1 (PPS1) describes Sustainability Appraisal in Paragraph 9 of Annex B: *'A Sustainability Appraisal is intended to assess the impact of plan policies from an environmental, economic and social perspective. It is intended to test the performance of a plan against the objectives of sustainable development and thereby provide the basis for its improvement'*.
- 1.23 SA thus helps planning authorities to fulfil the objective of contributing to the achievement of sustainable development in preparing their plans.
- 1.24 There are many definitions of sustainable development. However, the most commonly used and widely accepted is that coined by the World Commission of Environment and Development in 1987 as: *'Development which meets the needs of the present without compromising the ability of future generations to meet their own needs'*
- 1.25 The UK Government's Sustainable Development Strategy 'Securing the Future', published March 2005, outlines a set of shared UK principles which will be used to achieve the goal of sustainable development. The guiding principles have been agreed by the UK government, Scottish Executive, Welsh Assembly Government and the Northern Ireland Administration. They bring together and build on the various previously existing UK principles to set out an overarching approach. The five guiding principles will form the basis for policy in the UK. For a policy to be sustainable, it must respect all five of these principles in order to integrate and deliver simultaneously sustainable development:
- **Living within environmental limits** – respecting the limits of the planet's environment, resources and biodiversity to improve our environment and ensure that the natural resources needed for life are unimpaired and remain so for future generations;
 - **Ensuring a Strong, Healthy and Just Society** – meeting the diverse needs of all people in existing and future communities, promoting personal wellbeing, social cohesion and inclusion, and creating equal opportunity for all;
 - **Achieving a Sustainable Economy** – Building a strong, stable and sustainable economy which provides prosperity and opportunities for all, and in which environmental and social costs fall on those who impose them (polluter pays); and efficient resource use incentivised;
 - **Promoting Good Governance** – Actively promoting effective, participative systems of governance in all levels of society – engaging people's creativity, energy and diversity;
 - **Using Sound Science Responsibly** – Ensuring policy is developed and implemented on the basis of strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle) as well as public attitudes and values.

⁴ Town and Country Planning (Local Development) (England) Regulations 2004. The Regulations came into force on 28 September 2004.

Requirement for Strategic Environmental Assessment

- 1.26 The EU Directive 2001/42/EC on the assessment of effects of certain plans and programmes on the environment (the 'SEA Directive') came into force in the UK on 20 July 2004 through the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.27 The Directive applies to a variety of plans and programmes including those for town and country planning and land use. The LDF is prepared and adopted by an authority at the local level and is required by legislative provisions. It is prepared for the purposes of town and country planning/land use and is likely to have significant effects on the environment. It is therefore the case that the DPDs and SPDs prepared as part of the Babergh District LDF are required to be subject to environmental assessment, under the SEA Directive.
- 1.28 The overarching objective of the SEA Directive is:
- "To provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans... with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans... which are likely to have significant effects on the environment." (Article 1)*
- 1.29 SEA is an iterative assessment process which plans and programmes are now required to undergo as they are being developed, to ensure that potential significant environmental effects arising from the plan/programme are identified, assessed, mitigated and communicated to plan-makers. SEA also requires the monitoring of significant effects once the plan/programme is implemented.
- 1.30 The SEA Directive and the SEA Regulations state that the SEA must consider the following topic areas:
- Biodiversity;
 - Population;
 - Human Health;
 - Flora and Fauna;
 - Soil;
 - Water;
 - Air;
 - Climatic Factors;
 - Material assets;
 - Cultural heritage, including archaeological and built heritage;
 - Landscape; and
- The interrelationship between these factors.

The SA Process

- 1.31 The requirements to carry out SA and SEA are clearly distinct, but guidance⁵ from the Office for the Deputy Prime Minister (ODPM – now Communities and Local Government (CLG)) states that

⁵ Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, November 2005

it is possible to satisfy both through a single appraisal process and provides a methodology for doing so. Therefore, from herein, the process encompassing SA and SEA will be referred to as SA.

1.32 According to the same guidance, the main stages in the SA process are as follows:

- **Stage A** – Setting the context and objectives, establishing the baseline and deciding on scope;
- **Stage B** – Developing and refining options and assessing effects;
- **Stage C** – Preparing the Sustainability Appraisal Report;
- **Stage D** – Consultation on the plan and the Sustainability Appraisal Report; and
- **Stage E** – Monitoring the significant effects of implementing the plan.

1.33 The ODPM guidance emphasises that SA is an iterative process which identifies and reports on the likely significant effects of the plan and the extent to which its implementation will achieve the social, environmental and economic objectives by which sustainable development can be defined. The intention is that SA is fully integrated into the plan making process from the earliest stages, both informing and being informed by it. The guidance also sets out a requirement for the preparation of the following reports:

- **Scoping Report** (documenting Stage A work) which should be used for consultation on the scope of the SA;
- **Sustainability Appraisal Report** (documenting Stage B work) which should be used in the public consultation on the Core Strategy DPD. The final SA Report fully encompasses the requirement to produce an Environmental Report under the SEA Directive.

1.34 Table 1.1 sets out the various SA stages, tasks and relationships with the DPD preparation, as set out in ODPM guidance.

Table 1.1 - Incorporating SA in the DPD Preparation Process

DPD Stage 1: Pre-production – Evidence Gathering	
SA Stages and tasks	
Stage A: Setting the context and objectives, establishing the baseline and deciding upon the scope	
A1: Identifying other relevant policies, plans and programmes, and sustainability objectives	
A2: Collecting baseline information	
A3: Identifying sustainability issues and problems	
A4: Developing the SA framework	
A5: Consulting on the scope of the SA	
DPD Stage 2: Production	
SA Stages and tasks	
Stage B: Developing and refining options and assessing effects	
B1: Testing the DPD objectives against the SA framework	
B2: Developing the DPD options	
B3: Predicting the effects of the DPD	
B4: Evaluating the effects of the DPD	
B5: Considering ways of mitigating adverse effects and maximising beneficial effects	
B6: Proposing measures to monitor the significant effects of implementing the DPD	
Stage C: Preparing the Sustainability Appraisal Report	
C1: Preparing the SA Report	
Stage D: Consulting on the preferred options of the DPD and SA Report	
D1: Public participation on the preferred options of the DPD and SA Report	
D2 (i): Appraising significant changes	
DPD Stage 3: Examination	
SA Stages and tasks	
D2 (ii): Appraising significant changes resulting from representations	
DPD Stage 4: Adoption and Monitoring	
SA Stages and tasks	
D3: Making decisions and providing information	
Stage E: Monitoring the significant effects of implementing the DPD	
E1: Finalising aims and methods for monitoring	
E2: Responding to adverse effects	

Purpose of the SA Report

- 1.35 SA is required to inform the decision making process during the preparation of the Core Strategy. This will ensure that potential sustainable development implications of the Core Strategy are identified and recognised in the choices made by the LPA. The SA must also test the

performance of the Core Strategy in order to determine whether it appears to be appropriate for the task intended.

- 1.36 The requirement to prepare an SA Report arises directly from Article 5.1 of the SEA Directive which states that:

'An Environmental Report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated.'

- 1.37 In SA, the SA Report incorporates the requirements of the Environmental Report as required under the SEA Directive.

- 1.38 For more information about the work undertaken during the initial stages of the SA process please refer to the Scoping Report, the Issues and Options SA Report and the Growth Options and Broad Locations Core Strategy SA Report on the Council's website. This SA Report takes the process further by reporting on the significant social, environmental and economic effects of the preferred policies.

Suffolk Sustainability Appraisal Group

- 1.39 In 1994, Suffolk's Local Planning Authorities established a work group to compile a common methodology or approach to the SA of Development Plans' objectives, policies and proposals as well as to assess the impact of planning policies and decisions on progress towards sustainable development. The group has evolved to reflect changing circumstances over the years and is now called the Suffolk Sustainability Appraisal Group (SSAG). The group continues to produce annual monitoring information, but the main focus is now concentrated on the statutory requirement to carry out SA incorporating SEA as part of LDFs.

- 1.40 The main area for joint working between SSAG and relevant councils has been Stage A, through the setting of the context and objectives of the DPD, establishing the baseline conditions, deciding on the scope of the SA and developing an appraisal framework of sustainability objectives and indicators. There have been several key areas of joint working that assisted all of the Suffolk authorities in reaching the Scoping Report stage, including:

- Identifying and reviewing of policies, plans and programmes and sustainable development objectives at County, National and International Level that will affect or influence the DPD, SPD and LDF surveys;
- Collecting relevant social, environmental and economic baseline information and produce a characterisation of the District Council area;
- Identifying initial issues through the analysis of trends relating to existing monitoring; and
- Developing the SA framework.

- 1.41 The Scoping Report contains a list of documents compiled by the workgroup. Early consultations regarding the draft SA Framework for Suffolk (incorporating SEA) and responses by the listed consultees is also set out in the Scoping Report.

Programme and Responsibility

1.42 Table 1.2 outlines the timetable and process undertaken to prepare the SA.

Table 1.2 - Key SA Tasks and Outputs

Task / Output	Date	Comments
SSAG and Babergh Scoping Report	August 2007	This report built upon work previously undertaken by SSAG and includes a review of relevant plans and programmes, baseline information about BDC, identification of key sustainability issues for Babergh and development of a SA framework.
Consultation	Dec 04/ Jan 05 (SSAG document); Feb 2007 (BDC document) Aug 2009 (BDC Updated document)	A wide range of organisations, groups and individuals were given the opportunity to make comments. Feedback was received from 8 of these, most notably from the Environment Agency, Natural England, RSPB, Suffolk Wildlife Trust and English Heritage.
Updated Scoping Report (available on the Babergh website)	September 2009	The 2007 Scoping Report was updated, taking into account the consultation comments received.
Draft Core Strategy Issues and Options Initial Sustainability Appraisal Report (available on the Babergh website)	May 2009	The report presented the appraisal of the Draft Core Strategy Issues and Options.
Consultation		A wide range of organisations, groups and individuals were given the opportunity to make comments. Feedback was received from 9 of these organisations/ individuals, most notably from Natural England, English Heritage, Suffolk Coasts and Heaths AONB and GeoSuffolk. In response to the comments received the objectives were amended to include 'geodiversity' in addition to 'biodiversity'. 'Geodiversity' was originally considered as part of the framework for the Issues and Options Core Strategy under historic issues but this was amended to be considered with 'biodiversity' issues.
Growth Options and Broad Locations Core Strategy SA Report	April - July 2010	The report presented the appraisal of the Core Strategy Growth Scenarios and Broad Locations.
Consultation	October – November 2010	A wide range of organisations, groups and individuals were given the opportunity to make comments. Feedback was received from RSPB, the Environment Agency, J & J Design, Colchester Borough Council and Orwell Developments Ltd. Comments relate

		mostly to water quality and resource information and issues, biodiversity and the assessment of broad locations
Core Strategy Submission Draft SA Report	Draft June 2011 Final Oct 2011	This report presents the appraisal of the Submission Core Strategy as well as all relevant information contained in previous SA Reports.

- 1.43 The SA Report is a result of joint working between Babergh District Council (BDC) and Atkins. The initial stages of the SA process were undertaken by BDC and SSAG. Atkins was subsequently appointed to take the process further, assessing first the broad locations for the Core Strategy and advancing the SA Report. Babergh District Council then completed the assessments for the growth scenarios. Atkins then undertook the assessment of the preferred policies in the Core Strategy Submission Draft and finalised the SA Report.

Consultation

- 1.44 The Core Strategy preparation process provides several opportunities for public consultation and involvement and stakeholders and the public has been consulted on the SA Scoping Report (during 2005, 2007 and 2009); the Issues and Options Core Strategy (May 2009); and the Growth Options Core Strategy SA Report (October – November 2010). The public will be consulted on the Submission Core Strategy SA Report (this document). Consultation on the SA of BDC's Core Strategy has and will continue to be undertaken alongside the Core Strategy itself. Consultation responses to the listed SA Reports can be found in the SA Report Appendices. A number of key organisations, including statutory consultation bodies (i.e. English Heritage, Environment Agency and Natural England), were specifically targeted for the consultation process.
- 1.45 The Core Strategy Submission Draft will be subject to a formal public consultation period and will be submitted to the Secretary of State. This SA Report will accompany the Core Strategy Submission Draft Document on consultation which will take place from 10th October to 2nd December 2011.

Relationship with Habitats Regulations Assessment

- 1.46 Under Regulation 48(1) of the Conservation (Natural Habitats, &C) (Amendment) (England and Wales) Regulations 2006 an Habitats Regulations Assessment (HRA) needs to be undertaken in respect of any plan or project which:
1. Either alone or in combination with other plans or projects would be likely to have a significant effect on a European Site, and
 2. Is not directly connected with the management of the site for nature conservation.
- 1.47 European sites include Special Areas of Conservation (SAC) and Special Protection Areas (SPA). Additionally, PPS9 states that consideration should also be given to sites designated as potential SPAs, candidate SACs and Wetlands of International Importance (Ramsar sites). Babergh District is known to contain a number of the above types of sites and it is also located in a proximity to a number of the European sites, and as such, an HRA of BDC's Core Strategy is required.
- 1.48 A Stage I HRA preliminary review of the BDC Issues and Options Core Strategy Report was undertaken by Atkins in October 2009. This identified that there may be likely significant effects from the development of the broad locations, identified for future growth in the Issues and Options Core Strategy, on the conservation objectives and therefore the integrity of nine European sites.



- 1.49 A more detailed Stage II HRA Screening of the Core Strategy Submission Draft document has been undertaken. This HRA Screening has identified some details within individual policies where clarifications within the policy or explanatory text can mitigate potential risks, preventing likely significant effects on the European sites from the policies' implementation. These include:
- A clear commitment to protection of the European sites;
 - Mitigation strategy;
 - Specific mitigation commitments for development at Brantham; and
 - Monitoring at Stour and Orwell Estuaries SPA / Ramsar site.

2. Sustainability Appraisal Methodology

Overview of Approach

- 2.1 The approach used in the SA of the BDC Core Strategy is based on the process set out in the guidance⁶ from the ODPM on SA of LDDs. The SA has been conducted to also meet the requirements of the SEA Regulations⁷.
- 2.2 The methodology adopted involved the completion of SA stages A, B, C and D and associated tasks as outlined in Figure 2.1. The sections below describe the methodology employed, the findings of which are presented in subsequent sections of this report.

Stage A: Setting the Context and Objectives, Establishing the Baseline and Deciding on Scope

- 2.3 Scoping work, which built upon initial SA-related work undertaken by SSAG for the whole of Suffolk, was undertaken by BDC in 2007 and revised in 2009. The updated report is available on the Babergh website. The role of this scoping work was to help ensure that the SA covered the key sustainability issues that are relevant to Babergh within the context of the Core Strategy.

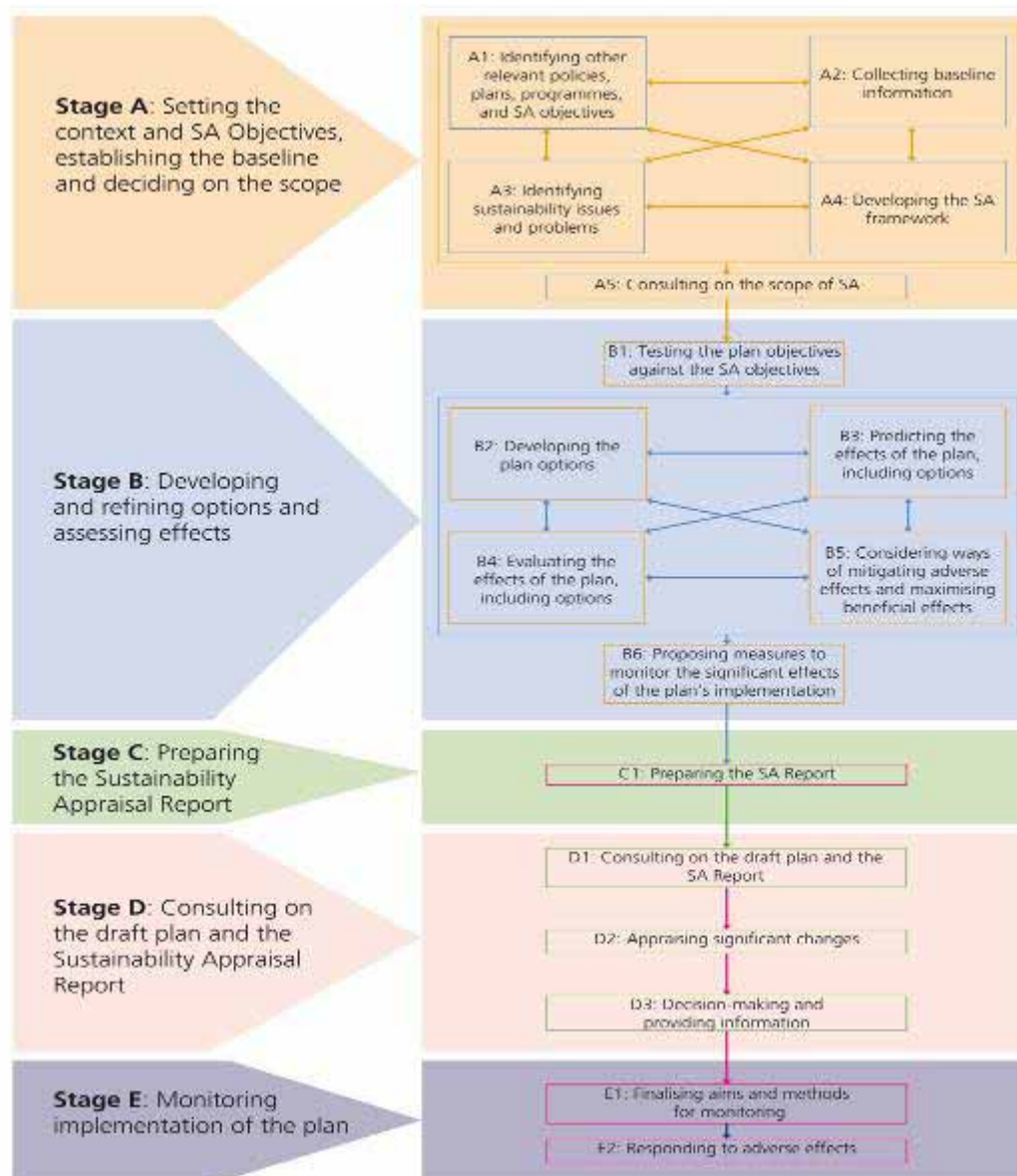
Other Relevant Plans and Programmes

- 2.4 Both the Core Strategy and the SA Scoping Report should be set in the context of national, regional and local objectives along with strategic planning, transport, social, economic and environmental policies. This being the case a comprehensive review of all relevant plans, policies and programmes (PPPs) was carried out as part of the SA scoping process. The review ensures that the objectives in the SA Report generally adhere to, and are not in conflict with, objectives found in other PPPs and also assists in the setting of sustainability objectives for the SA. In addition to this it can also be used to ascertain potential conflicts between objectives which may need to be addressed as part of the process.
- 2.5 The PPPs reviewed included, but not exclusively, those identified by SSAG as likely to affect or influence DPDs, SPDs and LDFs in Suffolk. A list of the PPPs reviewed is included in Section 3. The report with the scoped documents is available on the Babergh website.

⁶ Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, November 2005.

⁷ Environmental Assessment of Plans and Programmes Regulations July 2004, which transposed EU Directive 2001/42/EC on assessment of effects of certain plans and programmes on the environment (the 'SEA Directive') into UK law.

Figure 2.1 – Relationship between SA Stages and Tasks



Source: Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, November 2005.

Baseline Data

- 2.6 To predict accurately how the Core Strategy proposals will affect the environment, social and economic factors, it is important to understand the current state of these factors and then examine their likely evolution without the implementation of the plan.
- 2.7 Baseline information and data are summarised in Section 4. Full baseline datasets can be viewed on the Babergh website where data are listed under social, environmental and economic groupings covering:
- General indicator;
 - Quantified data within the plan area;
 - Comparators and targets (if applicable);
 - Trends (if identified); and

- Source of the information.

2.8 The datasets have been extracted from a wide range of available publications and datasets. Sources have included, among others, baseline data collection undertaken by SSAG, national government and government agency websites, census data, the Office for National Statistics and Annual Monitoring Reports (AMR) produced by BDC. No primary research has been conducted.

Sustainability Issues

2.9 The key sustainability issues for Babergh were derived by analysing the baseline data and contextual information from other documents and assessing what the significant issues relating to the District are likely to be. The issues outlined in the Scoping Report were identified in a generalised manner. Key issues for the sustainability of the district are outlined in Section 5.

Sustainability Appraisal Framework

2.10 A framework of objectives, sub objectives, indicators and targets, against which all documents relating to the LDF of Councils in Suffolk can be assessed, was drawn up by the SSAG and informally consulted upon in December 2004/ January 2005. This initial work was developed by BDC, alongside the outcomes of the review of relevant plans and programmes, the evolving baseline and developing analysis of key sustainability issues. Through this work, a draft SA framework was produced. A revised framework was then developed taking on board comments from the consultation on the Babergh SA Scoping Report (2007) The SA Framework is presented in Section 6.

Consulting on the Scope of the Sustainability Appraisal

2.11 At this stage the Council sought the views of the statutory Consultation bodies, SSAG and others on the scope and level of detail of the ensuing SA Report. A Scoping Report was prepared to that effect in 2007. The consultation results were taken into account and an updated Scoping Report was produced in September 2009, which influenced and helped shape this SA Report (see Babergh website for the Scoping Report).

Stage B: Developing and Defining Options

Compatibility Assessment of Core Strategy Objectives against SA objectives

2.12 A compatibility matrix was developed to identify to what extent the objectives of the BDC LDF, which are replicated within the Core Strategy are compatible with the SA objectives, and vice versa (see Section 7).

2.13 When testing compatibility the following scale was used:

Table 2.1 - Key to Compatibility of Objectives

✓	Positive compatible
×	Possible Conflict
•	Neutral

Assessment of Strategic Options

- 2.14 An assessment of the strategic options the Core Strategy was then conducted. The assessment used a broad-brush and qualitative approach, which is generally accepted as good practice by the SA guidance for the earlier strategic stages of the appraisal.
- 2.15 Potential sustainability effects for each of the strategic options were assessed in terms of progress towards achieving the relevant SA objective and sub objective using the scoring system presented in. The assessment was taken, considering likely positive and negative effects of implementation of the option on each SA sub objective in the short, medium and long term as well as secondary, cumulative and synergistic effects. These were summarised in an overall 'rating' score and the nature of the effect and justification of the score provided.

Table 2.2 – Scoring of Policy Options Assessment

++	The Option will have a very positive impact on the sustainability objective
+	The Option will have a slightly positive impact on the sustainability objective
0	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.
-	The Option will have a slightly negative impact on the sustainability objective
--	The Option will have a very negative impact on the sustainability objective
?	The Option impact on an issue is uncertain/cannot be predicted at this stage

- 2.16 The assessment of the Core Strategy options allowed the most and least sustainable aspects of each option to be identified, with the aim of, where necessary, amending the options in order to promote their likely sustainable effects and reduce their likely unsustainable effects. This assessment also informed the selection of options or their aspects are also considered in the Growth Scenarios Core Strategy. Full details can be found on the Babergh website in the SA for the Core Strategy Issues and Options.

Assessment of Broad Locations

- 2.17 Proposed broad locations for new development were also assessed in order to determine their performance in sustainability terms, with reference to social, environmental and economic factors. Existing SA guidance recognises that the most familiar form of SA prediction and evaluation is generally broad-brush and qualitative. It is recognised that quantitative predictions are not always practicable and broad-based and qualitative predictions can be equally valid and appropriate.
- 2.18 For the assessment of the broad locations there was a need to devise location specific SA criteria to cover, for example, accessibility to schools, healthcare facilities and other community services, accessibility to public transport routes, opportunities to promote non-motorised transport modes, identify specific environmental constraints and establish the proposed broad locations' uses. The SA Framework adopted for the assessment of the broad locations is set out in Section 7.
- 2.19 A 'traffic light' assessment scale (shown in Table 2.3) has been used to depict the conformity or non-conformity of each broad location with the criteria outlined below. The strategic level appraisal recognises that all the broad locations offer a degree of flexibility for accommodating development within them and opportunities for overcoming constraints identified. This resulted in fewer negative 'absolutes' (i.e. red colour coding) being attached to the broad locations' scoring. However, the assessment highlights those areas that need to be carefully looked into and addressed during the next planning stage of the sites allocation process so as to avoid and mitigate potential negative effects.

- 2.20 Matrices were used to record likely sustainability effects of each broad location against each criterion. Full details of the sites assessments can be found in Appendix A (Appendices part III) and a summary of the assessment is presented in Section 7.

Table 2.3 - 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		

Assessment of Growth Scenarios and Policies

- 2.21 The SA Framework, as developed by SSAG and BDC, used to guide the assessment is shown in Table 6.1.
- 2.22 The detailed assessment comprised a systematic two-stage process, described below.

Prediction of Effects

- 2.23 Using the baseline data and supporting information, the effects of the growth scenarios and preferred policies have been predicted for each of the SA objectives. A six point scale was used to characterise the magnitude of predicted effects in terms of the change to the current baseline. Effects were also characterised in terms of their *geographical extent*, their duration (*short, medium or long term*), whether they are likely to be *temporary* or *permanent*, and the degree of *certainty* with which the prediction was made. Predictions were made using the evidence of the baseline data wherever possible. Short term, medium and long term effects were defined as those predicted to commence within the first five, five to ten and ten or more years of implementation of the Core Strategy, respectively.
- 2.24 The magnitude of effects was defined in terms of progress towards achieving the relevant SA objective:
- **Major Positive** - likely to result in substantial progress towards the objective
 - **Minor Positive** - likely to result in limited progress towards the objective
 - **Major Negative** - likely to be substantially detrimental to achieving the objective
 - **Minor Negative** - likely to be to the limited detriment of achieving the objective

Assessment of the Significance of Effects

- 2.25 The effects predicted on each SA objective for the different scenarios and policies were assessed for significance using a simple, systematic process. An assessment score was derived for each objective based on the scores for each effect characteristic (*magnitude, duration, scale, permanence and certainty*) for short, medium and long term effects, using the assessment scale shown in Table 2.4.

Table 2.4 - Scoring of Growth Options and Policies 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

- 2.26 For the purposes of analysing the results of the assessment, significant effects are considered to be those that result in strongly or moderately negative or positive effects.
- 2.27 It should be emphasised that the information quality, and attendant uncertainties and assumptions required to address them, vary across the evidence base for the SA objectives. This has been systematically recorded and taken into account in the detailed appraisal sheets in Appendices B and D (Appendices Part III). Thus, where a major effect has been predicted for a particular SA objective, but the evidence base for this contains uncertainties or its interpretation requires a number of assumptions, the measure of information quality recorded in the appraisal has been reduced, and this is reflected in the calculation of the effect significance.
- 2.28 Where effects have been regarded as positive but not significant, minor negative or a mixture of both positive and negative effects, recommendations have been made to improve the potential of these policies to contribute to more sustainable development.

Secondary and Cumulative Effects Assessments

- 2.29 Annex I of the SEA Directive requires that the assessment of effects include secondary, cumulative and synergistic effects⁸.
- 2.30 **Secondary or indirect effects** are effects that are not a direct result of the plan, but occur away from the original effect or as a result of the complex pathway e.g. a development that changes a water table and thus affects the ecology of a nearby wetland. These effects are not cumulative and have been identified and assessed primarily through the examination of the relationship between various objectives during the prediction of effects.
- 2.31 **Cumulative effects** arise where several proposals individually may or may not have a significant effect, but in-combination have a significant effect due to spatial crowding or temporal overlap between plans, proposals and actions and repeated removal or addition of resources due to proposals and actions. Cumulative effects can be:
- Additive- the simple sum of all the effects;
 - Neutralising- where effects counteract each other to reduce the overall effect;
 - Synergistic– is the effect of two or more effects acting together which is greater than the simple sum of the effects when acting alone. For instance, a wildlife habitat can become progressively fragmented with limited effects on a particular species until the last fragmentation makes the areas too small to support the species at all.
- 2.32 Many environmental problems result from cumulative effects. These effects are very hard to deal with on a project by project basis through Environmental Impact Assessment. It is at the SA level that they are most effectively identified and addressed.
- 2.33 Cumulative effects assessment is a systematic procedure for identifying and evaluating the significance of effects from multiple activities. The analysis of the causes, pathways and consequences of these effects is an essential part of the process.
- 2.34 Cumulative (including additive, neutralising and synergistic) effects have been considered throughout the SA process, as described below:

⁸ ODPM 2006, *A Practical Guide to the SEA Directive*,
<http://www.communities.gov.uk/documents/planningandbuilding/pdf/practicalguidesea.pdf>

- As part of the review of relevant strategies, plans and programmes and the derivation of draft SA objectives, key receptors have been identified which may be subject to cumulative effects.
- In the process of collecting baseline information cumulative effects have been considered by identifying key receptors (e.g. specific wildlife habitats) and information on how these have changed with time, and how they are likely to change without the implementation of the Local Development Framework. Targets have been identified (where possible), that identify how close to capacity the key receptor is, which is a key determining factor in assessing the likelihood of cumulative and synergistic effects occurring, and their degree of significance.
- Through the analysis of environmental issues and problems, receptors have been identified that are particularly sensitive, in decline or near to their threshold (where such information is available).
- The development of SA objectives, sub objectives, indicators and targets has been influenced by cumulative effects identified through the process above.
- The likely cumulative effects of the strategic alternatives have been identified which highlighted potential cumulative effects that should be considered later in the SA process.
- Testing the consistency between the Core Strategy and SA objectives has highlighted the potential for cumulative effects against specific Core Strategy objectives.
- Cumulative effects of the scenarios have been predicted and assessed through the identification of key receptors and SA objectives that consider cumulative effects assessment.

Mitigation

- 2.35 Mitigation measures have been identified during the evaluation process to reduce the scale/importance of significant negative effects and, where possible, enhance positive effects.

Monitoring

- 2.36 SA monitoring involves measuring indicators which will enable a better understanding of the causal links between the implementation of the plan and the likely significant effects (positive or negative) being monitored. It thus helps to ensure that any adverse effects which arise during implementation, whether or not they were foreseen, can be identified and that action can be taken to address them.
- 2.37 Section 12 proposes a framework for the monitoring of the Core Strategy. This has been developed alongside monitoring undertaken and proposed by SSAG, the BDC AMR and National Indicators.

Stage C: Preparing the Sustainability Appraisal Report

- 2.38 This SA Report has been prepared to accompany the Submission Core Strategy on consultation. Previous SA Reports were prepared for the Core Strategy Issues and Options document (2008) and Growth Scenarios and Broad Locations document (2010).

Stage D: Consulting on the Draft Plan and Sustainability Appraisal Report

- 2.39 The previous Core Strategy Issues and Options and Growth Scenarios and Broad Locations SA Reports were consulted upon and their contents revised to take into account comments arising from the consultations. This Submission Core Strategy SA Report will be consulted on next and comments received will inform the ensuing Examination.

Meeting the requirements of the SEA Directive

- 2.40 As mentioned in Section 1 there is a fundamental difference between the SA and SEA methodologies. SEA is primarily focused on environmental effects and the methodology addresses a number of topic areas namely Biodiversity, Population, Human Health, Flora and Flora, Soil, Water, Air, Climatic Factors, Material Assets, Cultural Heritage and Landscape and the interrelationship between these topics. SA, however, widens the scope of the appraisal to assess the effects of a plan to include social and economic, as well as environmental topics.
- 2.41 This SA has been undertaken so as to meet the requirements of the SEA Directive for environmental assessment of plans. Table 2.5 sets out where the specific SEA requirements have been met in this SA Report.

Table 2.5 - Schedule of SEA Requirements

Requirements of the Directive	Where Covered in Report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is:	
a) An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes	Sections 1 and 3
b) The relevant aspects of the current state of the environment and the likely evolution without implementation of the plan or programme	Sections 4 and 5
c) The environmental characteristics of areas likely to be significantly affected	Sections 4 and 5
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directive 79/409/EEC and 92/43/EEC	Sections 4 and 5
e) The environmental protection objectives established at international, community or national level which are relevant to the programme and the way those objectives and any environmental considerations have been taken into account during its preparation	Section 3
f) The likely significant effects on the environment, including: short, medium and long term; permanent and temporary; positive and negative; secondary, cumulative and synergistic effects on issues such as: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Sections 8, 9 and 10
g) The measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse effects on the environment of implementing the plan or programme.	Sections 10 and 11

Requirements of the Directive	Where Covered in Report
h) An outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Sections 8, 9 and 10
i) A description of measures envisaged concerning monitoring (in accordance with regulation 17)	Section 12
j) A non-technical summary of the information provided under the above headings	Non-Technical Summary

3. Other Relevant Plans and Programmes

Introduction

3.1 The SEA Directive states that the Environmental Report should provide information on:

'The plan's relationship with other relevant plans and programmes' and "the environmental protection objectives, established at international, [European] Community or national level, which are relevant to the plan... and the way those objectives and any environmental considerations have been taken into account during its preparation".

3.2 A review of all relevant plans and programmes was undertaken. This review was based upon the list of relevant PPPs identified by SSAG and developed for the individual nature of Babergh, and identified the relationships between the SA and plans and programmes which, in turn, has enabled potential synergies to be exploited and, conversely, conflicting initiatives to be identified. Table 3.1 lists the documents reviewed as part of the Core Strategy SA process.

Table 3.1 – Relevant Plans and Programmes

International/European Context
The Johannesburg Declaration on Sustainable Development – Commitments arising from summit (September 2002)
The UN Millennium Declaration and Millennium Development Goals (September 2000)
Kyoto Protocol and the UN Framework Convention on Climate Change (May 1992)
Bern Convention on the Conservation of European Wildlife and Natural Habitats (September 1979)
Ramsar convention on Wetlands of international importance especially as waterfowl habitat (February 1971)
Bonn Convention on the Conservation of Migratory Species of Wild Animals (June 1979)
European Spatial Development Perspective (May 1999)
Air Quality Framework Directive – 96/62/EC (September 1996) and 2008/50/EC (April 2008)
Directive to promotion of the use of energy from renewable sources – 2001/77/EC; 2003/30/EC and 2009/28/EC (June 2009)
Directive for the encouragement of bio-fuels for transport – 2003/30/EC (May 2003)
Water Framework Directive – 2000/60/EC (October 2000)

Urban Waste Water Treatment Directive – 91/271/EEC (May 1991)
Water pollution caused by Nitrates from agricultural sources: Nitrates Directive – 91/676/EEC (December 1991)
Bathing Water Quality Directive – 76/160/EEC (December 1975) and 2006/7/EC (2006)
Drinking Water Directive – 98/83/EC (November 1998)
Strategic Environmental Assessment 2001/42/EC (June 2001)
Environmental Impact Assessment 85/337/EEC and amended Directive 97/11/EC (March 1997)
Directive 79/409/EEC on the Conservation of Wild Birds, as amended (April 1979)
Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (May 1992)
Framework Waste Directive 75/442/EEC, as amended in codified version of 2006/12/EC (April 2006)
Directive 99/31/EC on the landfill of waste (April 1999)
Directive 2008/50/EC on ambient air quality and cleaner air for Europe (June 2008)
Directive 2008/28/EC on the promotion of the use of energy from renewable sources and amending subsequently repealing Directives 2001/77/EC and 2003/30/EC (June 2009)
Packaging and packaging waste directive – 94/62/EC (December 1994)
A New Partnership for Cohesion – Third Report on Economic and Social Cohesion (February 2004) and Draft New Regulations for Renewed Structural Funds (July 2004)
Aarhus Convention (June 1998)
EU Sixth Environmental Action Plan (July 2002)
Waste Incineration Directive 2000/76/EC (December 2000)
End of Life vehicles Directive 2000/53/EC (implemented April 2002)
Waste Electrical & Electronic Equipment Directive 02/96/EC (April 2002)
National, Regional and Local Context (Generic)
National Planning Policy Guidance and Planning Policy Statements
PPS1 – Creating Sustainable Communities (January 05) and Supplement to PPS1 (December 2007) Planning and Climate Change, and supplement to PPS1 – Eco-towns (July 2009)
PPG2 – Green Belts (January 95)
PPS3 - Housing (November 2006)
PPS4 – Planning for Sustainable Economic Growth (December 2009)
PPS5 – Planning for a Historic Environment (March 2010)
Draft PPS – Planning for a Natural and Healthy Environment (March 2010)
PPS7 - Sustainable Development in Rural Areas (August 2004)
PPG8 - Telecommunications (August 2001)

PPS9 – Biodiversity and Geological Conservation (August 2005)
PPS10 – Planning for Sustainable Waste Management (July 2005)
PPS11 - Regional Spatial Strategies (September 2004)
PPS12 – Local Spatial Planning (June 2008)
PPG13 – Transport (April 2001)
PPG14 - Development on Unstable Land (April 1990)
PPG17 – Planning for Open Space, Sport and Recreation (July 2002)
PPG18 – Enforcing Planning Control (December 1991)
PPG19 - Outdoor Advertisement Control (March 2002)
PPG20 – Coastal Planning (September 1992)
PPS22 – Renewable Energy (August 2004)
PPS23 – Planning and Pollution Control (November 2004)
PPG24 – Planning and Noise (September 1994)
PPS25 – Development and Flood Risk (March 2010), and PPS25 Supplement - Development and Coastal Management (March 2010)
MPS 1 - Planning & Minerals (November 2006)
Urban
Urban White Paper (2000)
Towns and Cities Strategy and Action Plan, Urban Renaissance in the East of England (2003)
Rural
Government Rural White Paper: Our Countryside – the future – a fair deal for rural England, DETR (November 2000)
Countryside and Rights Of Way Act (November 2000)
Rural Strategy DEFRA (2004)
Sustainable Communities
The UK Government Sustainability Development Strategy: Securing The Future (March 2005)
Sustainable Communities Plan: Building for the Future (February 2003)
A Sustainable Development Framework for the East of England (October 2001)
Sustainable Communities in the East of England (February 2003)
Securing the Future', the UK Government Sustainable Development Strategy (March 2005)
Creating Sustainable Communities – In the East of England (January 2005)
Embedding Sustainable Development in the East of England (August 2009)
Regional Spatial Strategy
Regional Spatial Strategy – RSS, The East of England Plan (May 2008)
A Revision to the Regional Spatial Strategy for the East of England, Accommodation for

Gypsies and Travellers and Travelling Showpeople in the East of England (July 2009)
East of England Plan > 2031 (November 2009)
RSS14 for the East of England SEA Scoping Report (September 2004)
Other Regional Strategies
An Integrated Regional Strategy for the East of England (February 05)
East of England European Strategy 2003 – 2004 (June 2003)
Towards Sustainable Construction – A Strategy for the East of England, (2003)
East of England Implementation Plan – A consultation (April 2009)
Moving to the new Single Regional Strategy (July 2009)
Regeneration
Glemsford, Heritage Economic Regeneration Scheme (2000 – 2003)
Sudbury, Heritage Economic Regeneration Scheme (2003 – 2006)
Anglia Estate, Gt Cornard, Regeneration (2005 -2007)
Sudbury Market Town Partnership (2004)
Pin Mill Regeneration (2006)
Community Energy Project in Sudbury (2000 -2003)
Transport
Aviation White Paper 'The future of air transport' (December 2003)
The Future of Rail, White Paper (July 2004)
The Future of Transport: a network for 2030. White Paper (July 2004)
Government/DfT 10 Year Transport Plan (July 2000)
East of England Regional Transport Strategy (April 2003) (Incorporated as a chapter in RPG14)
Suffolk Local Transport Plan 2006-2011
Local Transport Action Plan for Sudbury and Great Cornard 2006
Local Transport Action Plan for Capel St Mary (2006)
Suffolk Bus Strategy, 2006 – 2011 (March 06)
Community Strategies and Community Development Strategies
Altogether a better Suffolk – Suffolk's Community Strategy (2004)
Suffolk's Community Strategy 2008 to 2028 (June 2008)
Western Suffolk Local Strategic Partnership: Community Strategy 2006 to 2016 (2006)
Babergh East Local Strategic Partnership – Community Plan 2005-2008 and 2008 to 2010 (July 2005)
Suffolk Structure Plan
Suffolk Structure Plan – 2001 This has been replaced by the East of England Plan with the exception of a few saved policies

Neighbouring Authority and National Park Local Plans/Local Development Documents
Mid Suffolk District Council, Adopted Core Strategy (September 2008)
St Edmundsbury Borough Council, Submission Core Strategy (January 2010)
Ipswich Borough Council, Proposed Submission Core Strategy (September 2010)
Suffolk Coastal District Council, Core Strategy and Development Management Policies (Pre Submission Document) (March 2010)
Tendring District Council, Issues and Options Core Strategy (May 2009)
Braintree District Council, Submission Draft Core Strategy (February 2010)
Colchester Borough Council, Adopted Core Strategy (December 2008)
Babergh District Council, Strategic Plan 2008 – 2018
Babergh 5 year Capital Strategy (2007)
Public Service Agreements 2008 -2011
Suffolk County Council Corporate Plan 2006/08
Local Area Agreement: Suffolk 2005-2008
Suffolk County Council Policy and Performance Plan 2005/6
Best Value Performance Plan for Babergh, 2003/2004
Babergh Local Plan (2006)
Pathfinder Strategy Babergh (2007)
Social – National, Regional and Local Context
Social Inclusion
Regional Social Strategy for the East of England (May 2004)
Race equal scheme – Action plan for 2004 -2006
Social Inclusion and Community Cohesion Strategy for Suffolk (2008-2010)
Suffolk County Council Equalities Policy (April 2003)
Youth Strategy for Babergh (June 2004)
Health
White Paper: Choosing Health: Making healthy choices easier (Nov 2004)
Healthy Futures A Regional Health Strategy for the East of England 2005 – 2010 (May 2006)
Social Care Annual Plan 2003-2004
Joint Strategic Needs Assessment for Suffolk 2008 – 2011 (December 2007)
NHS Plan (March 2000)
Suffolk Health Improvement Plan 2001/2002 (June 2001)
Local Health Improvement Plan (November 2002) and Healthy Ambitions (June 2008)
Culture
A Better Life: The role of culture in the sustainable development of the East of England

(EERA, September 2006)
Culture: a catalyst for change. A Strategy for Cultural Development for the East of England, Living East (June 2004)
A Cultural Strategy for Suffolk (March 2002)
District Cultural Strategy – Babergh, 2001-2006
Education
School Organisation Plan 2006 – 2011 (August 2006)
Suffolk Children and Young Peoples Plan 2006–2009 and 2009 - 2011
Suffolk's Strategy for Learning 2004-2009: The Single Educational Plan (March 2004)
Housing
Regional Housing Strategy for the East of England 2005-2010 (July 2005) and The East of England Housing Statement - People, Places, Homes: Priorities for Housing and Regeneration in the East of England 2010-2014
Affordable Housing Study: The Provision of Affordable Housing in the East of England 1996-2021 (2003)
East of England Affordable Housing Study Stage 2: Provision for Key workers and Unmet Housing Need (2005)
Suffolk Supporting People Five Year Strategy 2005-2010 (August 2005) and Refreshed Strategy (Update 2008)
ODPM Circular 01/2006: Planning for Gypsies and Travellers (January 2006)
Code for Sustainable Homes: A step-change in sustainable home building practice (Communities and Local Government, 2006) and (February 2008)
Babergh Housing Strategy 2004 - 2009
Babergh Homelessness Review and Strategy 2003
Babergh Housing Needs Surveys, 2004 and 2008
Babergh Housing Supply and demands analysis, 2004
Ipswich Housing Market Area, Strategic Housing Market Assessment 2008
Community Safety
Suffolk Community Safety Strategy, 2001 and Suffolk Community Safety Partnership 2007-2009
Babergh Crime Reduction Partnership, Babergh Community Safety Strategy 2002-2005; 2005 -2008 and Strategic Action Plan 2009-2010
Crime and Disorder Reduction Partnership Strategy 2005-2008
Environmental - National, Regional and Local Context
Environmental Strategies
Environment, Our future: Regional Environment Strategy for the East of England, East of England Regional Assembly and East of England Environment Forum (July 2003)
Soil

Farming and Food Strategy, Facing the Future, DEFRA, (December 2002) and Food 2030 Strategy (January 2010)
The First Soil Action Plan for England: 2004 – 2006 (2004) and Safeguarding our Soils, A Strategy for England (Defra 2009)
Contaminated Land Strategy, Babergh District Council (April 2009)
Open Space
Draft Study of Existing Outdoor Playing Space for Children within Babergh District Council, 2004
Climate
Climate Change – UK Programme, 2006 (March 06)
Defra's Climate Change Plan (March 2010)
Living with Climate Change in the East of England – summary Report supported by technical report (2003)
Nottingham Declaration on climate change (October 2000)
Building a Greener Future: Towards Zero Carbon Development (DCLG) (December 2006)
Air Quality
National Air Quality Strategy for England, Wales, Scotland and Northern Ireland (January 2000) and the updated strategy (July 2007)
Report on the updating and screening assessment of Air Quality in the Babergh District (July 2003)
Water
Water Framework Directive – Initial Advice to Local Planning Authorities in England and Wales (Environment Agency) (February 2006) and Water for life and livelihoods: River Basin Management Plans Anglian Water Basin District (December 2009)
North Essex Catchments Flood Management Plan (December 2009) and
East Suffolk Catchments' Flood Management Plan, Managing Flood Risk (December 2009)
Babergh DC Strategic Flood Risk Assessment (2009)
Water for people and the environment: Water resources strategy – Regional action plan for Anglian Region (Environment Agency) (December 2009) and Water resources Strategy for the England and Wales (March 2009)
Suffolk Shoreline Management Plan (January 2010)
Biodiversity and Nature Conservation
The UK Biodiversity Action Plan (1994)
Working with the Grain of Nature: A Biodiversity Strategy for England (October 2002)
Butterfly Conservation – Regional Action Plan for Anglia (June 2000)
Circular 06/2005 (ODPM): Biodiversity and Geological Conservation – Statutory obligations and their impact on the planning system (August 2006)
BSI PAS 2010 (September 2006)
Wildlife and Countryside Act (1981, as amended)

Suffolk Local Geodiversity Action Plan (Draft March 2006)
State of Nature-Lowlands-future landscapes for wildlife (February 2004)
Suffolk Biodiversity Action Plan, being Updated (2000 - 2007)
Countryside Management
Dedham Vale AONB and Stour Valley Management Strategy 2004-2009; and Management Plan 2010-2015
Suffolk Coast and Heaths AONB Management Plan 2008 -2013
The Stour and Orwell Estuaries: Scheme of management and management strategy 2005 (2010)
Suffolk Countryside Strategy
Babergh Countryside Strategy, (unpublished 1997)
Greenways Countryside Project, Management Strategy 2005 – 2010 (2005)
'In step with Suffolk' Rights of Way Improvement Plan 2006 -2016 (SCC) (2006)
Woodland
A Strategy for England's Trees, Woods and Forests (DEFRA 2007)
Woodland for Life: The Regional Woodland Strategy for the East of England (November 2003)
Minerals and Waste
Suffolk Minerals Local Plan Adopted May 1999
Regional Waste Management Strategy (2002)
MPS 1 – Planning and Minerals (November 2006)
Suffolk Waste Local Plan (February 2006)
Suffolk Waste Submission Core Strategy (December 2009)
Joint Municipal Waste Management Strategy for Suffolk (October 2003)
Economic - National, Regional and Local Context
Economic and Employment Strategies
Regional Economic Strategy for the East of England – A Shared Vision (Nov 2004)
Prioritisation in the East of England (June 2003)
Regional Emphasis Document SR2004 (December 2003)
Framework for Regional Employment and Skills Action (FRESA) (2003)
International Business Strategy, Consultation Draft (December 2003)
Suffolk Rural Action Plan (March 2006)
Expanding Suffolk's Horizons: 2004-7 – A New Economic Strategy for Suffolk (2004)
Economic Development Programme 2006/07-2008/09
Tourism

Regional Tourism Strategy 2008-2010
Tomorrows Tourism Today (August 2004)
Good Practice Guide on Planning for Tourism (DCLG) (May 2005)
Sustainable Tourism Strategy for the East of England (March 2004)
Sport
East of England Plan For Sport (2004)

Review

- 3.3 A review of most of the above documents can be seen on the following website:
<http://www.babergh.gov.uk/Babergh/Home/Planning+and+Building+Control/Local+Development+Framework/Sustainability+Appraisal+and+Strategic+Environment+Assessment+%28For+Core+Strategy%29.htm>
- 3.4 The above mentioned documents were reviewed in terms of the following:
- Document name and reference points;
 - Key objectives, targets and indicators relevant to the LDF and the SA;
 - Implications for the Plan; and
 - Implications for SA.

4. Baseline

Introduction

- 4.1 The SEA Directive says that the Environmental Report should provide information on:
- 'relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan' and the "environmental characteristics of the areas likely to be significantly affected"; and*
- 'any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC'.*
- 4.2 In addition to the requirements of the SEA Directive, the statutory SA process requires the collection of additional information on social and economic characteristics of the plan area.

Baseline Data Collection

- 4.3 Baseline information provides the foundation for predicting and monitoring effects and helps to identify sustainability problems and alternative ways of dealing with them. Sufficient information about the current and likely future state of the plan area is required to allow the plan's effects to be adequately predicted.
- 4.4 The baseline information was gathered around the sustainability topics identified through previous work undertaken by the SSAG on developing a SA framework of objectives and sub objectives. The SSAG workgroup refined and adapted relevant social, environmental and economic baseline information previously gathered for the '*Suffolk's Environment ... towards sustainable development*' report in order to produce a characterisation of the area which sets out baseline data, targets, past trends and issues regarding sustainability. A complete baseline report covering Suffolk as a whole and each district in Suffolk is available and was used in the collection of the baseline data for this SA.
- 4.5 The Babergh SA Scoping Report sets out social, environmental and economic data which were updated in the Final Scoping Report and are reproduced below. The Scoping Report contains a list of the baseline indicators that were gathered. These indicators will be employed to measure the effects of implementation of the Core Strategy, thus forming a key part of the overall monitoring programme for the implementation of the LDF.
- 4.6 It should be noted that not all the information was readily available and some measures have been taken to collect the information for future reference.

Baseline Information

Social Baseline Information and Analysis of Trends

- 4.7 Babergh had a population of 83,461 in 2001 and was estimated at 87,000 in mid-2008⁹; with 34,862 households (2001 census). A significant percentage of the population are considered to be 'older people' (males over 65 and females over 60), with approximately 24%¹⁰ of the population within this category (19.1 % in 2004, Suffolk Observatory).

⁹ <http://www.statistics.gov.uk/statbase/product.asp?vlnk=15106>

¹⁰ <http://www.statistics.gov.uk/statbase/product.asp?vlnk=15106>

- 4.8 Babergh consists of an area of 59,378 hectares. The district has 76 parishes and 25 wards (see Figure 1.2). Babergh District is mainly classified as countryside, and has two market towns: Sudbury and Hadleigh. Of the 76 villages, 15 are considered to have key services and facilities within them and are classified as 'sustainable villages' in the Local Plan (2006). For planning purposes, part of the Ipswich Policy Area falls within the Babergh district.
- 4.9 Based on the 2001 Census figures, of the households in Babergh, 5,500 do not own a car (16%) but a significant proportion of households own 2 or more cars. Affordable housing, particularly for new forming households, is a major issue in the Babergh District, according to the Babergh District Housing Needs Survey, 2004 with average house and flat prices having risen by 109% and 110% respectively, since 2000. Since 2004 the price rises to 2008 have been less with an overall increase of 34.5% according to the Land Registry. In February 2007 (2008 figures in brackets) the average price of a detached house sold in the district was £318,791 (£326,928) and the price for a semi-detached house was £185,392, (208,554) for a terraced house £169,816, (£166,214) and flats/maisonettes £101,051 (£ 130,101).
- 4.10 There are also pockets of social deprivation in the district along with small areas where the health of the residents is notably worse than in the county or district as a whole. It is important not to overlook these areas in the evaluation process otherwise inequalities are likely to increase. Table 4.1 shows a summary analysis of the social baseline information contained in the baseline report and the prediction of future trends without the implementation of the plan being assessed, as required by the SEA Directive.

Table 4.1 – Social Sustainability Issues

Objective	Impact/ Progress	Future Trend	Sustainability Issue
Health	😊 😐	😐	No sustainability issues other than the number of people killed and seriously injured in road traffic accidents, which need to be reduced. Figures for Babergh however are below the average for Suffolk. There are however small areas where people have poor health, particularly in parts of Sudbury and Gt Cornard, which cause concern. Health inequalities may persist in the future without a targeted intervention through the Core Strategy and the lower-tier planning documents.
			Improved monitoring of data for change in playing space is needed.
Education	😊	😊	No sustainability issues. Figures for educational levels are similar or higher than the average for Suffolk. Trends are likely to remain positive with or without the implementation of the Core Strategy.
Crime and anti-social activity	😊 😞	😞	The crime figures for Babergh are relatively low for Suffolk. Even though the vast majority of people feel safe in the area where they live, crime rates and fear of crime have increased in the last number of years. These trends may persist in the future without the Core Strategy due to the lack of regeneration initiatives.
			Noise complaints have increased in the last few years.
			In relation to national figures these are still relatively low rates.

Objective	Impact/ Progress	Future Trend	Sustainability Issue
Poverty	😊	😞	No sustainability issues presently experienced. Figures for Babergh are lower than those for Suffolk. In general, however, there are a few areas which cause concern. Differences in deprivation levels may increase without a targeted intervention through the Core Strategy and the lower-tier planning documents.
Access to services	😐 😞	😞	There has been a rapid decrease in the number of people who have access to a wide range of rural services within their own village. With the area predominantly rural in nature, access to public transport and services are important issues to consider. The use of the car for the school run is increasing which is contrary to the county trend. Accessibility issues may be partially addressed through the Local Transport Plan; however, the lack of consideration and provision of key services locally without the Core Strategy in place is likely to lead to negative trends.
			Monitoring of access to key local services and food shops, new retail space and access to childcare places is improving.
Employment	😊	😞	Unemployment rate is low. Similar levels to average for Suffolk. Failure to strengthen the role of Hadleigh, Sudbury and the Ipswich Fringe without the Core Strategy may restrict employment opportunities for local people in the future.
	😐 😞		The proportion of lone parents and long term-ill who are economically active as well as the average earnings could affect sustainability in the district
Housing	😞 😐	😞	Homelessness, housing stock, housing land availability, housing types and sizes, average property prices are all sustainability issues that have been identified (the housing needs survey indicated housing types and sizes as well as affordability were serious issues within district). Without the Core Strategy the housing issues are likely to remain largely unaddressed.
			Monitoring of special needs housing and the number of unfit homes can be improved. The definition of special needs housing needs further work.
Quality of life	😐	😊	No sustainability issues have been identified but monitoring of data needs to be improved. Higher percentage of residents very satisfied with their neighbourhoods as a place to live than in Suffolk as a whole. Overall the area is likely to remain an attractive place to live with or without the implementation of the Core Strategy.
			Monitoring of the area of land managed for ecological interest with public access needs to be

Objective	Impact/ Progress	Future Trend	Sustainability Issue
			improved.

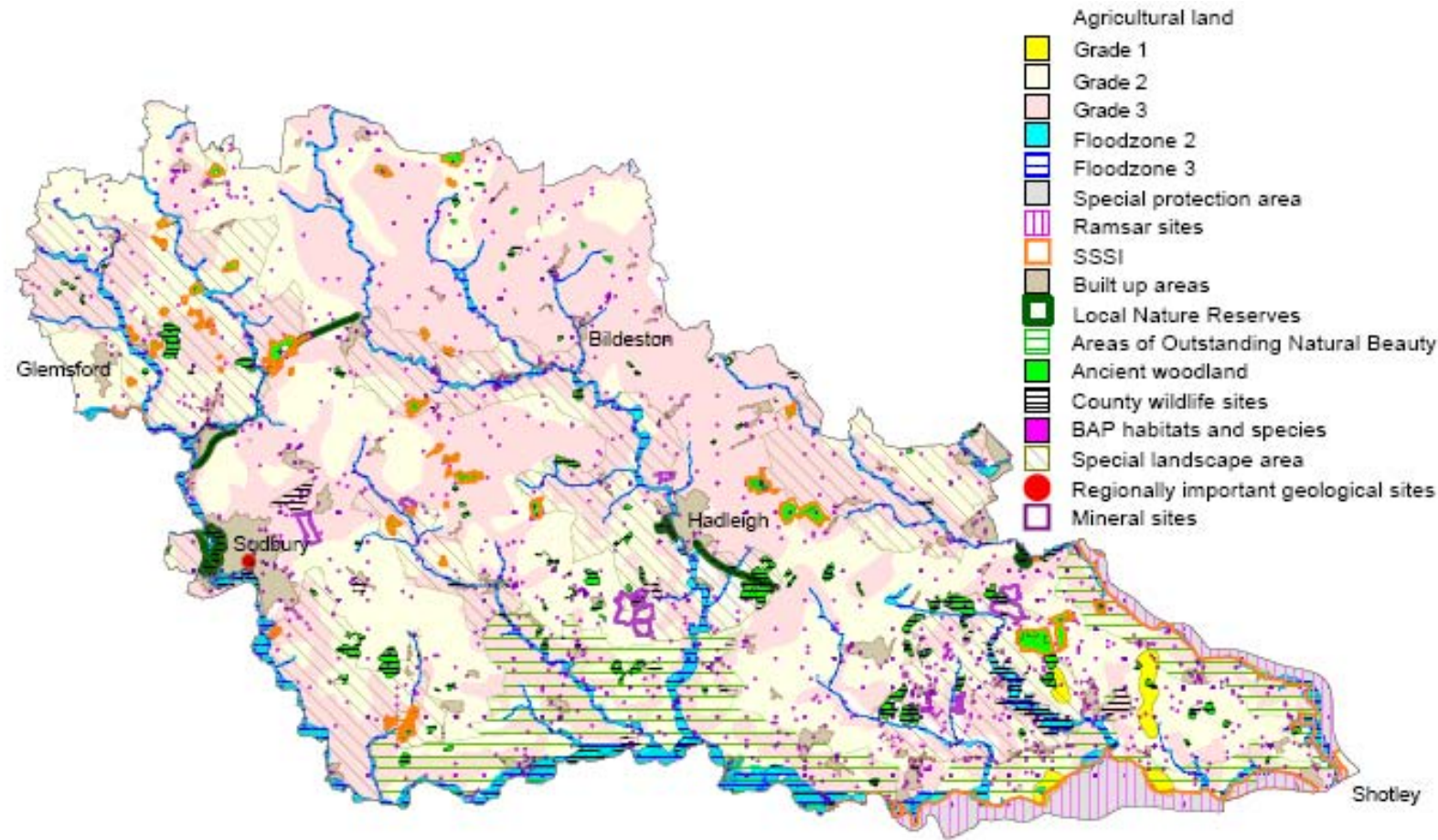
KEY: 😊 = Good progress/positive trend/on target. 😐 = Mixed progress/unable to determine trend.

😞 = Poor progress/negative trend/below target

Environmental Baseline and Analysis of Trends

- 4.11 Conserving the natural and historic environment in Babergh is considered a key issue for the district with its wealth of important and varied natural habitats including grassland, woodland, rivers, estuarine mudflats, saltings, etc. Many of these habitats have their importance recognised by various national, international, county and local designations. A large part of the district is classified as countryside and is under threat from changes in farming practices, new and existing development, visitor pressure, traffic generation and a lack of appropriate management, although large areas are part of countryside management schemes.
- 4.12 Babergh District supports two towns and several villages recognised nationally as being of exceptional architectural, historical or environmental quality. There are 28 designated conservation areas in Babergh and nearly 4000 buildings are listed as being of Special Architectural or Historical Interest.
- 4.13 Figure 4.1 and Figure 4.2 show key natural and built environment assets of the district.

Figure 4.1 - Map of the Natural Environment of Babergh District



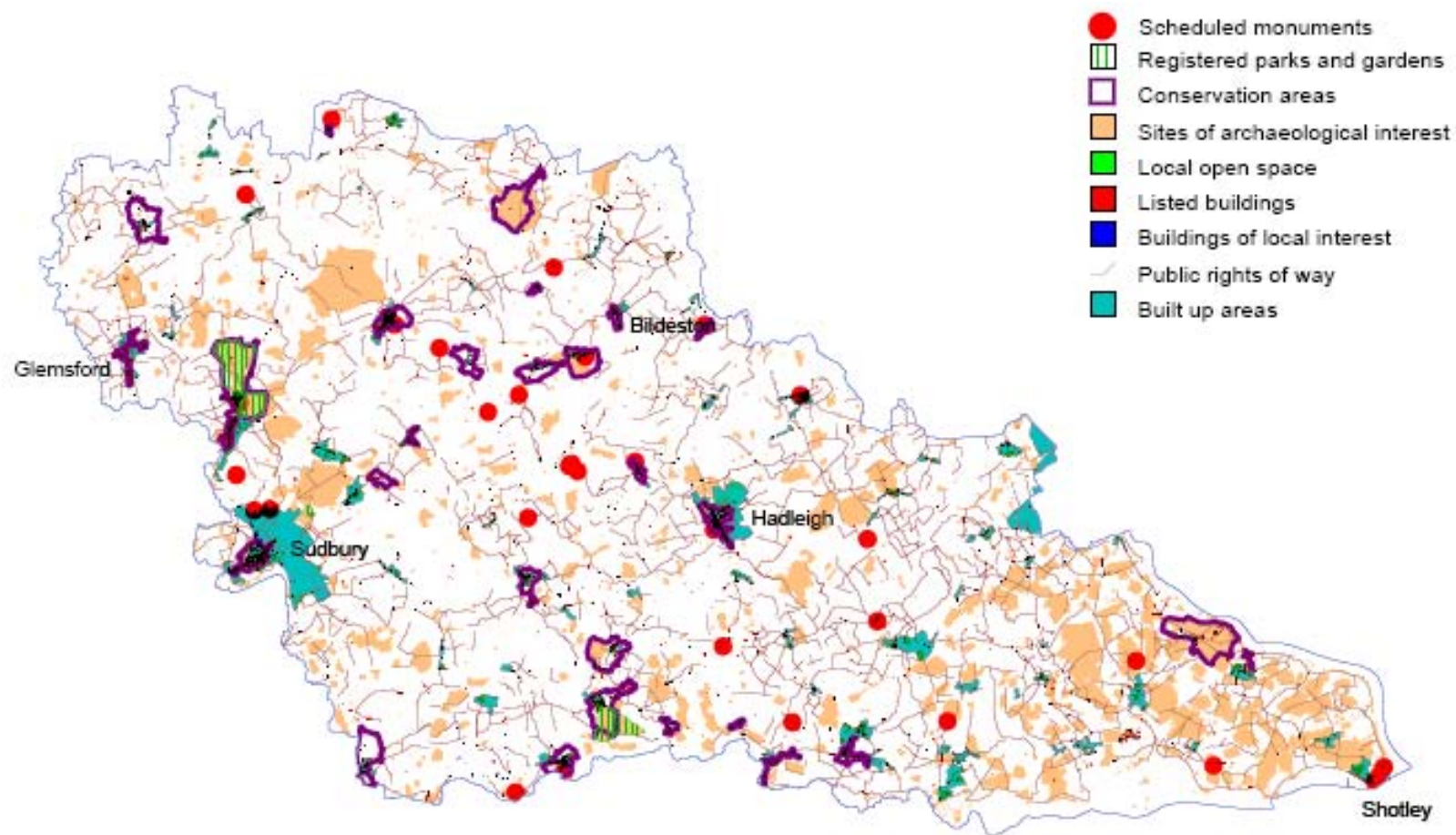
Constraints Map: Natural Environment



SCALE 1:200000

OS Crown copyright. All rights reserved
LA10023274 2009

Figure 4.2 - Map of the Built Environment of Babergh District



Constraints Map: Built Environment



SCALE 1:200000

OS Crown copyright. All rights reserved
LA10023274 2009

- 4.14 A summary of the analysis of the environmental baseline information contained in the baseline report and predicted future trends are provided in the table below. In addition, information on water quantity and quality from the 2011 Babergh Water Cycle Study (WCS) was also considered.

Table 4.2 – Environmental Sustainability Issues

Objective	Impact/ Progress	Future Trends	Sustainability Issue
Water and Air Quality	😊 😐	😊	Generally no sustainability issues regarding air quality although monitoring of locations along A12 and Sudbury town centre does have one Air Quality Management Zone due to traffic. Air quality issues are likely to be addressed through the Local Transport Plan.
	😞 😐	😐	Some water quality issues have been identified within the District. Phosphorous levels are high and most watercourses classified as having 'moderate' ecological status. Ammonia levels are very low and should be maintained through implementation of the appropriate waste water treatment works discharge limits. Two environmentally designated sites - Cattawade Marshes and Cornard Mere - have been identified as currently being in unfavourable condition due to water cycle processes. The situation is likely to remain stable without the Core Strategy in place.
Soil	😊	😊	No sustainability issues; monitoring of indicators has to be improved for rehabilitation and use of contaminated sites. The trends are likely to remain positive stable without the Core Strategy in place, as an additional land take of Greenfield land would be avoided.
Water and mineral resources	😐 😞	😞	No sustainability issues regarding the use of minerals.
			There are currently sufficient water resources to supply the existing requirements. However, several wastewater treatment works have no available headroom or are at capacity. Both groundwater sources have also been assigned an overall status of 'poor' The capacity issues may increase in the future with or without the Core Strategy.
Reduce waste	😊 😐	😊	No sustainability issues, household and municipal waste levels are being reduced. Rates are lower than for Suffolk. Work still needs to be done in some areas of recycling. Recycling rates are likely to increase with or without the Core Strategy due to the nationally set requirements.
Traffic	😞 😐		Sustainability issues – steadily rising traffic levels, amount of development taking place in major towns has decreased in some years (but this may change in the future) and there is also a decrease in rural service provision, this has

Objective	Impact/ Progress	Future Trends	Sustainability Issue
			led to increased car usage. The car is also heavily used for the school run counter to the Suffolk trend. Monitoring of indicators has to be improved. The situation does not compare favourably with those in the rest of Suffolk. Babergh has the second highest proportion of households with 3 or 4 cars in Suffolk in the 2001 Census. The trends may exacerbate without the Core Strategy due to the lack of local services provision and co-location of housing and employment.
			Monitoring of distances to key services, can be improved.
Reducing contributions to climate change	☹️ 😐	☹️	Sustainability issues – gas consumption increasing and few energy efficiency schemes planned. The absence of the Core Strategy will lead to the lack of retro-fitting initiatives for existing buildings and an increase in traffic, therefore, the overall GHG emissions are likely to increase.
			Monitoring of energy efficiency of homes needs to be improved.
Vulnerability to climate change	😊 😐	☹️	Monitoring has to be improved of properties at risk of flooding from rivers and the sea, incidence of fluvial flooding and coastal flooding. Although it is not believed that there are large numbers. Green infrastructure enhancements and other measures helping to adapt to changing climate may not be given an appropriate focus without the Core Strategy.
Biodiversity	😐 ☹️	😐	In terms of area affected, the Stour and Orwell river estuaries are in a declining condition dominate the condition of ecological SSSIs. Monitoring of reported conditions of SSSIs, achievement of the Species Action Plan targets, development proposals affecting selected BAP habitats is improving but bird survey results are not detailed enough to reach a conclusion. Without the Core Strategy in place, the situation may improve through other documents and initiatives (e.g. the estuary Shoreline Management Plan) or may remain stable.
Historical and archaeological areas	😊 😐	😐	No sustainability issues but monitoring of data needs to be improved. The trends are likely to remain stable without the Core Strategy in place
			There may need to be more appraisals of Conservation Areas.
Landscapes and	😐 😊	😊	The area of land designated as 'environmentally sensitive areas' has

Objective	Impact/ Progress	Future Trends	Sustainability Issue
townscapes			decreased, but other schemes have taken over and there has been an increase in the number of schemes overall as well as the area covered. The quality of the landscape as assessed through the landscape character assessment process has identified an improvement in the quality of the landscape features for the 2 character areas affecting Babergh. The trends are likely to remain stable without the Core Strategy in place.
			The number of village greens and commons, light pollution and monitoring the number of planning applications refused for reasons of poor design could to be improved but the latter is probably a poor indicator.

KEY: 😊 = Good progress/positive trend/on target. 😐 = Mixed progress/unable to determine trend.

😞 = Poor progress/negative trend/below target

Economic Baseline and Analysis of Trends

- 4.15 In 2008, 1.7% of the population were unemployed, compared to 1.1% the previous year. This is low compared with the Suffolk rate of 2.2%, which has increased from 1.6% in 2007 (Suffolk Data Observatory). The overall rate in Great Britain was higher still, at 2.8% in 2008.
- 4.16 The Babergh District Council Employment Land Study identified that Babergh has a diverse economy with a strong manufacturing sector, a declining agricultural base, and a tourism industry with significant growth potential. The business base is characterised by a high proportion of micro-businesses (employing 0 - 4 employees) with rates of business formation, in terms of VAT registrations slightly below the County average. The stock of businesses has increased in the District since the mid-1990s, indicating to some extent that the District remains attractive as a business location. It is important that the District becomes less reliant on the existing major companies and continues to nurture SMEs in sectors of growth potential such as ICT, business services and tourism.
- 4.17 Babergh has had a shortage of employment land, which has pushed land prices up. There is also a shortage of commercially attractive buildings available for immediate occupation. Research showed that the overall rating of Babergh as a business location was very positive. New employment land has been allocated in Hadleigh and Sudbury as well as on the Ipswich fringe and other locations to meet the identified local need.
- 4.18 In the context of Suffolk, Babergh has a comparatively small amount of industrial, warehouse and office floorspace reflecting its local and sub-regional economic role. Babergh has 29% of the potential general industry floorspace, no potential office floorspace, 22% of the potential high tech floorspace, no potential starter floorspace, and 2% of the potential storage floorspace in Suffolk. There appears to have been a lack of available start-up space, expansion space and opportunities for the development of any new employment locations. The importance of the provision of rural workspace has been identified in the study and the provision of local employment opportunities has been encouraged through the provision of workspace proposals in sustainable villages within the Local Plan.
- 4.19 According to 2001 Census figures 2,572 of the residents that work in the district travel to work by public transport and 27,977 travel to work by car, motorcycle or van. The average distance

travelled to a fixed place of work is 17.45 miles. This emphasises the need for a continued focus on sustainable development reducing the need to travel.

Table 4.3 – Economic Sustainability Issues

Objective	Impact/ Progress	Future Trends	Sustainability Issue
Prosperity and economic growth	😊 😐	😐	Positive trends in percentage change in the total number of registered businesses in the area, although the new business formation rates are low. Unemployment is very low in relation to national and Suffolk figures. The trends are likely to remain stable without the Core Strategy in place; however, there may be lost opportunities, as the functional clusters will not be strengthened strategically.
Revitalise town centres	😊 😞	😞	Proportion of town centre units with A1 uses has decreased, however the vacant units in the town centres have also decreased. Without the Core Strategy the main urban centres are not likely to be revitalised.
Efficient movement patterns and growth	😐	😞	The proportion of people who travel to work by sustainable modes of transport is below the county average and does not appear to be improving. To confirm this trend may not be possible until the next census. This may be due to the rural nature of the district but it has not reduced the district's attraction to investors. In the absence of the Core Strategy, efficient patterns of movement are not likely to be supported, due to the lack of local services provision in the functional clusters and co-location of housing and employment.
			Monitoring of locally sourced products stocked by major supermarkets has to be improved.
Indigenous and inward investment	😊 😐	😞	There is considerable interest both from within Suffolk and from outside the area, including international interest in investing in Babergh. There is currently (2006) high demand for employment floorspace within Babergh particularly from indigenous firms seeking to expand their businesses locally. The demand for leased premises is however limited. Without the Core Strategy, potential investors will lack a clear signal of where development will be promoted and how the local areas are likely to evolve in the future.

KEY: 😊 = Good progress/positive trend/on target. 😐 = Mixed progress/unable to determine trend. 😞 = Poor progress/negative trend/below target

5. Key Sustainability Issues

Introduction

- 5.1 The identification of the key sustainability issues most relevant to the Core Strategy has been undertaken through the review of relevant plans and programmes documented in Section 3, an analysis of baseline indicators set out in Section 4, key issues identified throughout the development of and likely to be addressed by the Core Strategy and work completed by the SSAG workgroup.

Results

- 5.2 Table 5.1 details the key sustainability issues to be addressed by the Core Strategy.

Table 5.1 – Key Sustainability Issues

No.	Key Issue	Description	Relevant SEA Topic
1	Role of market towns and urban fringe in the district	There are two market towns of Sudbury and Hadleigh in the district. They include the largest concentration of population in the district and provide a range of services and facilities to large rural catchment areas including employment, retail, leisure, health and education, other community facilities and physical infrastructure to support these. The towns in the Babergh district are of particular importance to the future vitality and viability of the district. The district also includes a part of the urban fringe of Ipswich, an important urban area that provides for most of the key services in this part of the district.	Population, Material Assets, Landscape
2	Rural character, the importance of towns and larger villages and access to services and facilities	Babergh is predominantly rural in character with many small villages that have limited services and facilities. These smaller villages depend on the larger villages and town centres in the district to provide for many of their day-to-day needs. It is important that the services and facilities of the villages in the district are safeguarded as well as recognising the important role of larger villages in the district.	Population, Material Assets, Cultural Heritage, Landscape
3	Improve sustainability and 'self-containment'	In a rural area such as Babergh it is difficult to achieve a reduction in car travel, as for many people in small villages/ countryside public transport will not replace the need to own and run a car. We need to look at reducing the need to travel by ensuring new development is located close to services and facilities and that these developments are carefully planned to provide opportunities for work and leisure etc. close to new homes.	Human Health, Air, Climatic Factors
4	Limited brownfield	The rural character of and settlement pattern of Babergh, with only 2 market towns (of limited	Soil, Landscape

No.	Key Issue	Description	Relevant SEA Topic
	land	size) and a part of the Ipswich fringe built up area, mean that the supply of brownfield land for re-development within the district is very limited. The prioritisation of brownfield land development has caused some problematic issues in the Babergh district, as it has led to significant pressure to redevelop the district's scarce employment land supply for residential redevelopment. The re-use of brownfield land has to be carefully considered to ensure the sustainable development of the district and achieving a balance between social, economic and environmental issues in the district.	
5	Ageing population	The population in Babergh, as is generally the case elsewhere in the country, is an ageing population. This places pressure on local health services and other services as well as underlining the importance of ensuring that the needs of the elderly population are addressed.	Population, Human Health
6	Need for affordable housing	Income in relation to house prices continues to mean that affordability in the district remains a problem and that there is a large need for affordable housing throughout the district.	Population, Human Health, Material Assets
7	Need to sustain the economy and achieve the right balance between highly skilled and low skilled jobs	Babergh is an economically diverse area, and economic activity rates in Babergh compare favourably with national and regional levels. It is important that we sustain and promote the economy in the district particularly since a large proportion of the workforce work outside of the district. Income rates and the level of highly qualified inhabitants are below regional and national averages and it is necessary for us to improve the balance between highly skilled and low skilled jobs in the district.	Material Assets
8	Strengths of the economy	It is important to recognise the drivers of our local economy and our existing strengths, and identify the potential for future new businesses and employment opportunities in the district. The ports of Felixstowe and Harwich, whilst not within the district, are major economic drivers for Babergh and are providers of jobs for many Babergh residents. The ports could also potentially benefit Babergh's economy through related employment generating development within the district, and the improved infrastructure which comes along with this. The attractive landscape, estuaries, and coastline, and the historic towns and villages in the district form the base of an important cultural and historic leisure and tourism sector. Businesses in this sector are important contributors to the local economy. There is also a significant agricultural base in the	Material Assets

No.	Key Issue	Description	Relevant SEA Topic
		district.	
9	Climate change	CO ₂ levels of emissions in the Babergh District are above regional and national levels. In addition the East of England region is particularly vulnerable to the effects of climate change. It is therefore important that we look at ways to contribute to reducing climate change as well as to adapt to its consequences which are inevitable.	Human Health, Air, Climatic Factors
10	Exceptional natural, historic and built environments	The district has a varied and attractive landscape, including several areas of importance to nature conservation. The district also has a prestigious historic environment, of outstanding character and quality. The value of the natural and built environment in the District forms the basis for a strong local tourism industry. It is important that we protect and enhance the natural, historic and built environments in the Babergh District, whilst planning for growth.	Biodiversity, Flora and Fauna, Soil, Water, Cultural Heritage, Landscape
11	Infrastructure constraints	New development should be supported by appropriate infrastructure to ensure that our communities are sustainable and healthy. It is therefore important that infrastructure needs are considered together with how new development will be accommodated in the district.	Material Assets
12	Water	Some water quality issues have been identified within the District in the recent WCS. Phosphorous levels are high and most watercourses classified as having 'moderate' ecological status. Two environmentally designated sites - Cattawade Marshes and Cornard Mere - have been identified as currently being in unfavourable condition due to water cycle processes. Several wastewater treatment works have no available headroom or are at capacity. Both groundwater sources have been assigned an overall status of 'poor'.	Water

6. Sustainability Appraisal Framework

Introduction

- 6.1 The SA Framework is a key component in completing the SA through synthesising the baseline information and sustainability issues into a systematic and easily understood tool that allows the assessment of effects arising from the implementation of the Core Strategy in key areas through progress towards the achievement of a number of objectives and sub objectives. Although the SEA Directive does not specifically require the use of objectives or indicators in the SEA process, they are a recognised and useful way in which social, environmental and economic effects can be evaluated and compared at key stages of the Strategy's development.
- 6.2 The SA Framework comprises a list of objectives and sub objectives. Progress toward achieving these objectives will be measured using the corresponding indicators. The purpose of the SA Framework is to provide a set of criteria against which the performance of the Core Strategy can be predicted and evaluated.

Babergh District Council Core Strategy SA Framework

- 6.3 An SA Framework has been developed using an iterative process, starting from the initial work undertaken by SSAG and developed following the review of relevant plans and programmes, the evolving baseline, analysis of key sustainability issues and consideration of which of these issues can potentially be addressed by the Core Strategy.
- 6.4 The SA Framework developed for the Babergh Core Strategy includes a series of carefully selected indicators which have been extracted and modified where necessary from the framework of indicators produced by SSAG, and from existing SSAG monitoring, in order to provide a clarification of the intended interpretation of each objective. The early indicators produced by the SSAG workgroup are set out in the Scoping Report. Sub objectives, indicators and targets have been developed as part of the SA framework and link to the baseline data.
- 6.5 The objectives chosen for Babergh District are tailored to its unique set of environmental, social and economic characteristics and the issues raised through the assessment and analysis of baseline information. Each objective is chosen for its desired effect as an outcome rather than a means of reaching that outcome. For example 'to reduce the amount of traffic on the roads' would be an overall objective and one means to achieve the objective would be to 'encourage more people to use public transport'.
- 6.6 The objectives are set out to cover the wide range of social, economic and environmental issues of sustainability and serve to identify how far the Core Strategy is addressing issues of sustainable development by facilitating the identification of potential conflicts between the aims for reaching sustainability and the approach set out in the DPD.
- 6.7 The updated SA Framework includes 23 objectives as shown in Table 6.1 below.

Table 6.1 – SA Framework

No	Headline Objective	Sub-Objective	Indicator	SEA Topic
Social Objectives				
1	To improve the health of the population overall	Will it improve access to high quality, health facilities?	Proportion of population with access to hospital or GP or dentist surgery (DfT accessibility indicators - define access)	Population, Human Health
		Will it reduce death rates?	Overall death rate by all causes (PCT)	
			Cancer deaths (malignant neoplasms) under 75 per 100,000 population (PCT)	
			Ischaemic Heart Disease deaths under 75 per 100,000 population (PCT)	
			Respiratory disease deaths (all ages) per 100,000 population (PCT)	
			Deaths from self harm and injury undetermined (all ages) per 100,000 population (PCT)	
			Number of people killed and seriously injured in road traffic accidents per 100,000 population (SCC)	
			Life expectancy (SDA)	
		Will it encourage healthy lifestyles?	Proportion of journeys to work on foot or by cycle (Census/SCC)	
			How do children travel to school? (QOL/BVPI)	
			Obesity in the population (PCT)	
			Change in existing provision of outdoor playing space (youth and adult space) (District open space assessments)	
			Change in existing provision of children's play space ((District open space assessments)	
			Change in provision of open space (District open space assessments)	
			The % of total length of footpaths and other rights of way which are easy to use by members of the public (BVPI)	
			Change in amount of accessible natural green space (Natural England Standards)	

No	Headline Objective	Sub-Objective	Indicator	SEA Topic
2	To maintain and improve levels of education and skills in the population overall	Will it improve qualifications and skills of young people?	Proportion of Year 11 pupils gaining 5+ A*-C grades at GCSE (District Wide SDA / BVPI)	Population, Material Assets
			Average point score per student at A and AS Level (District Wide SDA / BVPI)	
		Will it improve qualifications and skills of adults?	Proportion of the population with no qualifications (Census)	
			Proportion of the population with NVQ level 4 or higher (District Wide SDA)	
3	To reduce crime and anti-social activity	Will it reduce actual levels of crime?	Recorded Crime per 1000 population (SSAG/ SDA/ Nomis)	Population, Material Assets, Human Health, Air
			Burglary Rate (SDA)	
			Violent Crime Rate (SDA)	
		Will it reduce fear of crime?	Fear of Crime (QOL, Suffolk Speaks, British Crime Survey)	
		Will it reduce noise and odour concerns?	Number of noise complaints (Environmental Health Depts Districts)	
			Number of odour complaints (Environmental Health Depts Districts)	
4	To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	Proportion of the population who live in wards that rank within the most deprived 10% and 25% of wards in the country (SCC)	Population, Human Health, Material Assets
			Housing benefit recipients (LAS)	
5	To improve access to key services for all sectors of the population	Will it improve accessibility to key local services?	Percentage of rural population living in parishes which have a food shop or general store, post office, pub, primary school and meeting place (SSAG)	Population, Material Assets
			Proportion of population with access to key local services (eg GP, post office) (DfT accessibility indicators)	
		Will it improve accessibility to shopping facilities?	New Retail Floor Space in Town Centres (AMR/ Health Checks)	
			Proportion of population with access to a food shop (DfT accessibility indicators) – (those living within 30 minutes of key services by public transport)	
6	To offer everybody the	Will it reduce unemployment overall?	Unemployment rate (SSAG/AMR)	Population, Human

No	Headline Objective	Sub-Objective	Indicator	SEA Topic
	opportunity for rewarding and satisfying employment	Will it reduce long-term unemployment?	Long term unemployment (Nomis)	Health, Material Assets
		Will it provide job opportunities for those most in need of employment?	Proportion of lone parents and long term-ill who are economically active (Census)	
		Will it help to improve earnings?	Average Earnings (Inland revenue/AMR)	
7	To meet the housing requirements of the whole community	Will it reduce homelessness?	Homelessness (districts homelessness presentations)	Population, Human Health, Material Assets
		Will it provide enough housing	Housing Stock (SSAG)	
			Housing Land Availability (SSAG)	
		Will it increase the range and affordability of housing for all social groups?	Affordable Housing (SSAG)	
			Special Needs Housing	
			Housing Types and Sizes (SSAG)	
			Dwellings per hectare of Net Developable Area (SSAG)	
			Average property price to income ratio (SSAG)	
		Will it reduce the number of unfit homes?	Number of unfit homes per 1,000 dwellings (BVPI) (decent homes standard for LA/housing stock)	
8	To improve the quality of where people live and to encourage community participation	Will it improve the satisfaction of people with their neighbourhood as a place to live?	% of residents who are happy with their neighbourhood as a place to live (Suffolk Speaks/ODPM QOL surveys)	Population, Human Health
		Will it increase access to natural green space?	Area of land managed in whole or part for its ecological interest and with public access over and above public rights of way (SCC)	
			Areas of deficiency in terms of natural green space (SCC)	
			Change in amount of accessible natural green space (Natural England standards)	
		Will it encourage engagement in decision making?	Electoral turnout in local authority elections	
			Number of Parish Plans adopted (Suffolk Acre)	

No	Headline Objective	Sub-Objective	Indicator	SEA Topic
		Will increase the number of people involved in volunteer activities?	Number of people involved in volunteer activities (SCC/CVS)	
		Will it improve ethnic relations?	Number / rate of racist incidents (Racial Harassment Initiative)	
		Will it improve access to cultural facilities?	Number of visits to/uses of Council funded or part- funded museums per 1,000 population (BVPI 170a)	
			Number of visits to Council funded or part- funded museums that were in person, per 1,000 population (BVPI 170b)	
			The number of pupils visiting museums and galleries in organised school groups (BVPI 170c)	
Environmental Objectives				
9	To maintain and where possible improve water quality	Will it improve the quality of inland waters?	Water quality in rivers (EA)	Human Health, Water
			River Basin Management Plan Watercourse Status	
			River Basin Management Plan Groundwater Status	
			Groundwater quality (may be available from EA in future - CAMS)	
		Will it improve the quality of coastal waters?	Water quality in estuaries (EA)	
			Bathing water quality (EA)	
10	To maintain and where possible improve air quality	Will it improve air quality?	Have annual mean concentrations of any of 3 pollutants been exceeded (Annual Air Quality Report)	Human Health, Air, Climatic Factors
			Number of Air Quality Management Areas and dwellings affected (SSAG)	
11	To conserve soil resources and quality	Will it minimise the loss of greenfield land to development?	Number and percentage of new dwellings completed on greenfield land (AMR)	Human Health, Soil
			Number and percentage of existing housing commitments on greenfield land (SSAG)	
			Dwellings per hectare of net developable area (SSAG)	
		Will it minimise loss of the best and most versatile agricultural land to development?	Allocations on best and most versatile agricultural land (grades 1, 2, and 3) (AMR)	

No	Headline Objective	Sub-Objective	Indicator	SEA Topic
		Will it maintain and enhance soil quality?	Number and area of potential and declared contaminated land returned to beneficial use (Districts / EA)	
			Number / area of organic farms (Natural England/ Soil Association)	
12	To use water and mineral resources efficiently, and re-use and recycle where possible	Will it promote sustainable use of minerals?	Recycled aggregate production (SSAG)	Human Health, Water
		Will it promote sustainable use of water?	Water consumption data (Environment Agency)	
			Environment Agency Water Resource Availability Status	
			Wastewater Treatment and Collection capacity	
		Will it maintain water availability for water dependant habitats?	Water availability for water dependant habitats (Wetland Habitat Working Group)	
13	To reduce waste	Will it reduce household waste?	Household (and municipal) waste produced (SSAG)	Population, Human Health, Material Assets
		Will it increase waste recovery and recycling?	Tonnage / proportion of household (and municipal) waste recycled, composted and landfilled (SSAG / BVPI / PSA)	
14	To reduce the effects of traffic on the environment	Will it affect traffic volumes?	Traffic volumes in key locations (SCC)	Population, Human Health, Air, Climatic Factors
		Will it reduce the need for local travel?	Percentage of all new residential development taking place in major towns, other towns, and elsewhere (SSAG)	
			Percentage of rural population living in parishes which have a food shop or general store, post office, pub, primary school and meeting place (SSAG)	
			Distance to key services (new accessibility indicators from DfT)	
		Will it increase the proportion of journeys made using modes other than the private car?	Percentage of journeys to work undertaken by sustainable modes (SSAG)	
			Percentage of schoolchildren travelling to school by sustainable modes (BVPI)	
			Car parking standards (SSAG)	
15	To reduce emissions of greenhouse	Will it reduce emissions of green house gases by reducing energy consumption?	Consumption of electricity - Domestic use per consumer and total commercial /industrial use (Dept for Business, Innovation and Skills)	Population, Human Health, Air,
			Consumption of gas - Domestic use per consumer and total commercial /industrial use(Dept for	

No	Headline Objective	Sub-Objective	Indicator	SEA Topic
	gases from energy consumption		Business, Innovation and Skills)	Climatic Factors
			Energy efficiency of homes (BVPI 63 / HECA)	
		Will it increase the proportion of energy needs being met by renewable sources?	Installed electricity generating capacity using renewable energy (SSAG)	
16	To reduce vulnerability to climatic events	Will it minimise the risk of flooding to people and property from rivers and watercourses?	Flood risk - planning applications approved against Environment Agency advice (SSAG)	Population, Human Health, Climatic Factors
			Properties at risk of flooding (EA)	
			Incidence of fluvial flooding (properties affected) (EA)	
		Will it minimise the risk of flooding to people and property on the coast?	Incidence of coastal flooding (properties affected) (EA)	
		Will it reduce the risk of coastal erosion?	Developments refused because of risk of coastal erosion (SSAG)	
		Will it reduce the risk of damage to people and property from storm events?	Incidence of flood watches and warnings (EA)	
17	To conserve and enhance biodiversity and geodiversity	Will it maintain and enhance sites designated for their nature conservation and/or geological interest?	Change in number and area of designated ecological sites (SSAG)	Biodiversity, Flora and Fauna, Landscape
		Will it avoid disturbance or damage to protected species and their habitats?	Reported condition of ecological SSSIs (Natural England)	
			Development proposals affecting protected species outside protected areas (SWT)	
		Will it help deliver the targets and actions for habitats and species within the Suffolk Biodiversity Action Plan?	Achievement of Habitat Action Plan targets (SBRC/SBP)	
			Achievement of Species Action Plan targets (SBRC/SBP)	
			Development proposals affecting selected BAP habitats outside protected areas (SWT)	
		Will it help to reverse the national	Bird survey results (BTO/RSPB)	

No	Headline Objective	Sub-Objective	Indicator	SEA Topic
		decline in farmland birds?		
		Will it protect and enhance sites, features and areas of geological value in both urban and rural areas?	Number and area of geological SSSIs and RIGs (Natural England)	
			Reported condition of geological SSSIs and RIGs (Natural England)	
18	To conserve and where appropriate enhance areas of historical and archaeological importance	Will it protect and enhance sites, features and areas of historical and cultural value in both urban and rural areas?	Area of historic parks and gardens (SSAG)	Cultural Heritage
			Number and area of Conservation Areas and Article 4 directions (SSAG)	
			Number of Conservation Area Appraisals completed and enhancement schemes implemented (SSAG)	
			Number of listed buildings and buildings at risk (SSAG)	
		Will it protect and enhance sites, features and areas of archaeological value in both urban and rural areas?	Number of Scheduled Ancient Monuments (SAMs) damaged as a result of development (SSAG)	
			Planning permissions affecting known or potential archaeological sites (SSAG)	
19	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Will it reduce the amount of derelict, degraded and underused land?	Number and percentage of new dwellings completed on previously developed land (SSAG)	Landscape, Cultural Heritage
			Number and percentage of existing housing commitments on previously developed land (SSAG)	
			Number of vacant dwellings (Babergh Council Tax Records)	
		Will it improve the landscape and/or townscape?	Changes in the landscape (WI landscape survey) (SSAG)	
			Number / area of town / village greens and commons (SCC)	
			Area of designated landscapes - AONB, Environmentally Sensitive Areas (CA/ DEFRA)	
			Number of Environmentally Sensitive Area / Countryside Stewardship / Environmental Stewardship schemes (DEFRA)	
			Light pollution (CPRE)	
			Number of planning applications refused for reasons due to poor design (AMR)	
Economic Objectives				

No	Headline Objective	Sub-Objective	Indicator	SEA Topic
20	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Will it improve business development and enhance competitiveness?	Take-up of employment floorspace (SSAG)	Material Assets
			Employment permissions and allocations (SSAG)	
			Net percentage change in the total number of VAT registered businesses in the area (SDA / Suffolk Observatory)	
			Change in number of businesses paying business rates (NNDR)	
			Business formation rate (0% new VAT registrations as a % of total VAT registered stock) (SDA/Suffolk Observatory)	
		Will it improve the resilience of business and the economy?	Number and percentage of employees by employment division (SSAG)	
			Business start ups and closures (Suffolk Observatory)	
			Number and percentage of businesses by main industry type (AMR)	
			Number an percentage of businesses by size (number of employees) (AMR)	
		Will it promote growth in key sectors?	Number and percentage of businesses by industry type in key sectors (SSAG / AMR)	
		Will it improve economic performance in advantaged and disadvantaged areas?	Comparative industrial and office rental costs within the plan area (CLG/Estate Agents)	
		Will it encourage rural diversification?	Employment permissions and allocations in rural areas (SSAG)	
			Planning consents for B1, B2 and B8 in rural areas ((LAs)	
21	To revitalise town centres	Will it increase the range of employment opportunities, shops and services available in town centres?	Proportion of town centre units with A1 uses (SSAG)	Material Assets
		Will it decrease the number of vacant units in town centres?	Vacant units in town centres (SSAG)	
22	To encourage efficient patterns of movement in	Will it reduce commuting?	Distances travelled to work for the resident population (Census/SCC data)	Material Assets
			Employment permissions and allocations in urban areas (SSAG)	

No	Headline Objective	Sub-Objective	Indicator	SEA Topic
	support of economic growth		Number / percentage of people working from home (Census; SCC data)	
			Percentage of households with broadband and internet connection	
		Will it improve accessibility to work by public transport, walking and cycling?	Number of developments where a travel plan is submitted or is a condition of development (SSAG)	
			Percentage of journeys to work undertaken by sustainable modes (SSAG)	
		Will it reduce journey times between key employment areas and key transport interchanges?	Indicator only relevant for Ipswich but not considered suitable for Suffolk as a whole.	
		Will it increase the proportion of freight transported by rail or other sustainable modes?	Proportion of port freight carried by rail (Port Authorities / AMR)	
		Will it increase the consumption of locally produced food and goods?	Number of farmers markets and farm shops (LAs)	
23	To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	Number of enquiries to business advice services (business link, LAs)	Material Assets
		Will it encourage inward investment?	Number of enquiries to Suffolk Development Agency (Suffolk Development Agency/ LA / SCC)	
		Will it make land available for business development?	Employment land availability (SSAG)	
			Employment permissions and allocations (SSAG)	

7. Compatibility Assessment

7.1 The objectives originally included in the Issues and Options Draft Core Strategy were amended in the Preferred Options Core Strategy. Although the Preferred Options version was not published for public consultation, the amended objectives were tested for compatibility with the sustainability objectives by the Council. The 6 spatial objectives included in the Preferred Options Draft Core Strategy were:

- Objective 1: Promote the sustainable development of strong, safe, healthy and inclusive communities throughout the district. Steer development to towns and larger villages that are already well supported by services; are well served by public transport and have a range of employment opportunities, whilst sustaining rural communities and enhancing these communities where appropriate and possible.
- Objective 2: Allow for provision of sufficient land for housing, employment and other uses to achieve consistency with national and regional planning policy and to meet the needs of the district, including the provision of appropriate uses and mixes. Land supply should be responsive to changing circumstances and an adequate and continuous supply should be available. The use of brownfield land for development should be prioritised and maximised where appropriate.
- Objective 3: Protect, conserve, manage, promote and, where possible enhance the exceptional qualities, character, appearance and attractions of the District's natural, heritage and cultural assets including our historic environment, landscape, countryside, the Stour and Orwell Estuaries and biodiversity/ geodiversity that together contribute to forming a positive sense of place and local character in Babergh district.
- Objective 4: Ensure the protection and where possible, the improvement of natural resources including water and air quality. Promote the sustainable use of resources including water, maximise the use of renewable energies, minimise the production of waste and promote sustainable construction in all new development.
- Objective 5: Promote economic wellbeing and economic growth in a positive and flexible manner; encourage a wide range of shopping, leisure and recreational facilities; promote the prosperity of the District's two town centres, Sudbury and Hadleigh; and protect and enhance community facilities in local centres through policies and initiatives that recognise the strengths and weaknesses and local constraints, opportunities, stresses and influences on the differing parts of the local economy.
- Objective 6: Ensure that all new development makes appropriate provision for all of its physical, social and green infrastructure needs including appropriate transport infrastructure, sustainable modes of transport, social and community facilities, open space and green infrastructure; water and wastewater/sewerage infrastructure; it achieves optimum standards for reducing carbon emissions; and use policies and initiatives to ensure that we mitigate the effects of and/or adapt to climate change.

7.2 Further work, government changes and consultation on the Growth Issues and Scenarios (October / November 2010) has led to the reconsideration of the wording of the objectives. There are now 8 objectives listed in the Submission Core Strategy, shown below:

- Objective 1: Enable – mixed and balanced communities / comprehensive neighbourhoods;
- Objective 2: Support economic growth and prosperity, building on the strengths of the local economy, including strengthening the role of the rural economy;
- Objective 3: Facilitate – regeneration and renewal;

- Objective 4: Ensure provision of adequate infrastructure to support new development;
- Objective 5: Encourage/ Promote – adapting to climate change, resource efficient use of land and infrastructure;
- Objective 6: Protect / conserve and enhance: local character; built, natural and historic environment including biodiversity, landscape, townscape; shape & scale of communities; the quality and character of the countryside; and treasured views of the district;
- Objective 7: Support Rural Communities, local services and facilities;
- Objective 8: Manage and deliver development in a phased way so that growth is incremental and delivered at the appropriate time.

7.3 Although the wording of these objectives has significantly changed from that of the 6 objectives listed in the Preferred Options draft Core Strategy, the principle and intention have changed very little. The updated objectives are strongly aligned to the previous objectives as follows:

- Submission Draft Objective 1- links to PO Objectives 1 and 2;
- Submission Draft Objective 2- links to PO objective 5;
- Submission Draft Objective 3- (largely) links to PO Objective 5;
- Submission Draft Objective 4- links to PO Objective 6;
- Submission Draft Objective 5 – links to PO objectives 4, 2 and 6 (parts);
- Submission Draft Objective 6- links to PO objective 3;
- Submission Draft Objective 7 – links to PO objective 1 (in part); and
- Submission Draft Objective 8 – links to PO Objective 2 (in part).

7.4 The updated objectives were evaluated in terms of their compatibility with each of the sustainability objectives. The former compatibility assessment (for the Preferred Options Draft Core Strategy Objectives), was used as a basis for this, particularly where there was a strong alignment between the two sets of objectives. Table 7.1 below provides a compatibility matrix to identify the extent to which the Submission Core Strategy Objectives are compatible with the sustainability objectives.

Table 7.1 - Compatibility Assessment between the Core Strategy Objectives and the SA Objectives

SA Objectives	1. Enable Mixed and Balance communities	2.Support Economic Growth and prosperity, building on strengths of the local economy including strengthening the rural economy	3.Facilitate regeneration and renewal	4.Ensure provision of adequate infrastructure to support new development	5. Encourage / promote adapting to climate change, resource efficient use of land and infrastructure	6: Protect / conserve and enhance: local character; built, natural and historic environment including biodiversity, landscape, townscape; shape & scale of communities; the quality and character of the countryside; and treasured views of the district.	7: Support Rural Communities, local services and facilities	8: Manage and deliver development in a phased way so that growth is incremental and delivered at the appropriate time.
1. Health	✓	•	•	✓	✓	✓	✓	✓
2. Education and Skills	✓	✓	✓	✓	•	•	✓	✓
3. Crime and anti-social activity	✓	✓	✓	✓	•	✓	✓	✓
4. Poverty and social exclusion	✓	✓	✓	✓	•	✓	✓	✓
5. Key services	✓	✓	✓	✓	•	•	✓	✓
6. Employment	✓	✓	✓	•	•	✓	✓	✓
7. Housing	✓	•	✓	•	•	•	✓	✓

requirements								
8.Sense of community identity and welfare	✓	✓	✓	✓	✓	✓	✓	✓
9 & 10.Water and air quality	x	x	x	✓	✓	✓	•	•
11.To conserve soil resources and quality	•	x	x	•	✓	✓	•	•
12.(part) To conserve mineral resources	x	x	x	•	✓	✓	•	•
12 (part) Water Consumption	x	x	x	•	•	•	•	•
13. To reduce waste	•	x	x	•	✓	•	•	•
14. Reduce effects of traffic on the environment	✓	x	x	✓	•	•	•	x
15. Climate change	✓	x	x	•	✓	✓	•	•
16. Vulnerability to climatic events	✓	x	x	•	✓	✓	•	•
17. Biodiversity	•	•	•	•	✓	✓	•	•

and geodiversity								
18. Historical and archaeological importance	x	x	x	•	•	✓	•	•
19. Landscapes and townscapes	x	x	✓	•	•	✓	•	x
20. Prosperity and economic growth	✓	✓	✓	✓	•	✓	✓	✓
21. Town centres	✓	✓	✓	✓	•	•	•	✓
22 Economic growth	✓	✓	✓	✓	•	•	✓	✓
23. Accommodate indigenous and inward investment	✓	✓	✓	✓	•	•	•	✓

- 7.5 Overall the Submission Core Strategy objectives are compatible with the sustainability objectives, with the exception of objectives 1, 2 and 3 which show possible conflict. These objectives make provision for development of mixed and balanced communities, new land for provision of housing and employment, regeneration and renewal, including encouraging economic, leisure and retail growth. Any objectives promoting growth and development opportunities, by their very nature, will inevitably have the potential for conflict with environmental objectives. Conflicts anticipated between the housing needs of the district and environmental factors included effects on the conservation of soil resources; mineral resources; reduction of waste; reducing traffic and reducing water consumption and impacts on climate change. Other areas of potential conflict exist between achieving economic growth and investment and meeting environmental objectives for example the impact on the distinctive character of historic settlements, especially villages.
- 7.6 There is potential for predicted conflicts to be mitigated by careful site selection and the implementation of other Core Strategy objectives that aim to safeguard the built and natural environment, achieve sustainable development and provide infrastructural improvements.

8. Issues and Options

- 8.1 The detailed assessment tables produced for the SA of the Core Strategy Issues and Options can be found in Appendix A (Appendices Part II). This section summarises the overall findings of the assessment completed by the Council in 2009.
- 8.2 The scoring in the tables for each option against each objective and indicator denotes whether it has a positive effect, negative, neutral effect or the effect is uncertain and the range is set out in Table 8.1. Table 8.2 provides a summary of the assessment findings.

Table 8.1 – Key to Scoring for Issues and Options Assessment

The Option will have a very positive impact on the sustainability objective	++
The Option will have a slightly positive impact on the sustainability objective	+
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.	0
The Option will have a slightly negative impact on the sustainability objective	-
The Option will have a very negative impact on the sustainability objective	--
The Option impact on an issue is uncertain/cannot be predicted at this stage	?

Table 8.2 – Summary of Assessment

Option	Key Results	Comments
Section 4: Spatial Strategy for Babergh district		
Spatial Strategy		
Option 1: Business as Usual	+ 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.
Option 2: Maximum Urban Concentration	+ 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.
Option 3: Equitable Dispersion	+ 22 - 3 ? 14	This option will reinforce town centres as well as potentially helping sustain rural services
Option 4: Rural Development	+ 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.
Option 5: New Settlement	+ 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.
Housing (and other) Development in Rural Areas		
Question SS4: Option1: No Change (groups up to 3 dwellings)	+ 4 - 12	This will help meet the need for housing but would increase the need to use a car.
Question SS4: Option2: Groups from 5-6 dwellings	+ 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.
Question SS4: Option3: Groups from 10-12 dwellings	+ 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.
Question SS4: Option4: Groups up to 15 dwellings	+ 3 - 11 - - 8	This option has very significant adverse effects, particularly on the landscape and access to services as well as car usage.
Section 5: Housing		
Affordable Housing Provision		
Question H2: Option 1: Target of less than 500 new affordable homes per 5-year period	+ 7 - 2 ?/- 1	This option is likely to have several positive 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	This option is likely to have similar effects to the previous option (option 2) but in addition significant positive social effects are predicted.

Option	Key Results	Comments
	- 2 ?/- 1	
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.
Affordable Housing Requirements: Percentages		
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
Affordable Housing Requirements: Site Development Thresholds		
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: Standard percentage and lower thresholds	+ 4	This option is likely to have similar effects to the previous option (option 1) but significant positive long term, cumulative and synergistic effects are not predicted
Gypsies, Travellers and Travelling Showpeople's Accommodation		
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.

Option	Key Results	Comments
Section 6: Economy and Employment		
Employment Land		
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 EMP3: Maintain existing sites and allocate at local centres and more rural locations	+ 9 - 5 ? 1	This option has a large number of positive effects but also a number of negative effects including negatives such as poor access to services.
Question EMP5: Option EMP4: De-allocate some sites not already developed and allocate elsewhere	+ 6 ? 13	Similar to Option EMP2. Additional significant negative cumulative and synergistic effects are anticipated as a loss of additional greenfield and agricultural land.
Question EMP5: Option EMP5: Concentrate on provision of new employment land in the same locations as residential development, or through mixed use developments	+ 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.
Section 7: Built and Natural Environment		
Flood risk		
Question NBE2: Option 1: Development which cannot be located away from flood risk should contribute towards mitigation	++ 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.
Question NBE2: Option 2: Development which cannot be located away from flood risk does not need to contribute towards mitigation	- 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.
Flood risk and climate change considerations		
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.	++ 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.
Pollution (Air quality)		
Question NBE4: Option 1: Locate development away from sources of pollution and develop in areas which minimise the use of the car	++ 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, reducing the need to use the car (which should also be set out in other policies).
Question NBE4: Option 2: Allow development in areas	++ 3	This is a more limited option which reacts to development. Thresholds and details of mitigation

Option	Key Results	Comments
where air quality is an issue only if mitigation measures are put in place	+ 6 - 2 ? 1	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.
Section 8: Sustainability and Climate Change		
Residential Development		
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.
Non Residential Development		
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.
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.
Renewable Energy (for all end uses)		
Question SUS10: Option 1: No requirement	+ 4	There are limited benefits of this option because building regulations will still apply and should

Option	Key Results	Comments
		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 dwelling or 100 sq m non-residential floorspace	+ 5 - 1	There are benefits from this option but they are more limited, and they could still have an adverse impact on townscape or landscape.
Section 9: Retail and Town Centres		
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.
Section 10: Social & Community Infrastructure		
Sport and Recreation Facilities including Green infrastructure		
Question SCI2: 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.
Delivery of Community and Social Infrastructure		
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.

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

Option	Key Strengths	Key Weaknesses
Option 1: Business as Usual	Access to health facilities and healthy lifestyles Improve Qualifications Improve access key local services and shopping facilities Improve access to job opportunities	Loss agricultural land Decline in farmland birds



	Reduce homelessness, provide enough housing Increase range and affordability of housing Reduce need for local travel Increase proportion of energy needs met by renewable sources Reduce underused land Improve landscape/ townscape Improve business development and promote growth in key sectors, improve economic performance Rural diversification, increase range of employment opportunities Decrease vacant units in town centres Will it reduce commuting; improve access to work Increase consumption of local goods Encourage indigenous business, encourage inward investment and make land available for business development	
Option 2: Maximum Urban Concentration	Improve access to health facilities and healthy lifestyles Improve access to key local services and shopping facilities Improve access to job opportunities Improve earnings Reduce homelessness Provide enough housing Increase range and affordability of housing Involvement in volunteer activities Improve access to cultural facilities Increase recycling Reduce need for local travel Reduce car journeys Increase proportion of energy needs met by renewable sources Reduce underused land Improve landscape/ townscape Improve business development Promote growth in key sectors Improve economic performance Increase range of employment opportunities Decrease vacant units in town centres Reduce commuting Improve accessibility to work Reduce journey times between employment areas Increase consumption of local goods Encourage indigenous business Encourage inward investment Make land available for business development	Loss agricultural land Decline in farmland birds Reduction of rural diversification
Option 3: Equitable Dispersion	Improve accessibility of shopping facilities	Reduce access to health facilities



	Reduce homelessness Provide enough housing Increase range and affordability of housing Involvement in volunteer activities Reduce need for local travel Reduce car journeys Increase proportion of energy needs met by renewable sources Reduce underused land Improve business development Promote growth in key sectors Economic performance Rural diversification Increase range of employment opportunities Decrease vacant units in town centres Reduce commuting Improve accessibility to work Reduce journey times between employment areas Increase consumption of local goods Encourage indigenous business Encourage inward investment Make land available for business development	Loss agricultural land Decline in farmland birds
Option 4: Rural Development	Access to health facilities Encourage healthy lifestyles Access key local services Accessibility of shopping facilities Reduce homelessness Provide enough housing Increase range and affordability of housing Involvement in volunteer activities Reduce need for local travel Increase proportion of energy needs met by renewable sources Improve business development Promote growth in key sectors Economic performance Encourage rural diversification Increase range of employment opportunities Reduce commuting Improve accessibility to work Increase consumption of local goods Encourage indigenous business Encourage inward investment	Improve access to cultural facilities Loss agricultural land Decline in farmland birds Improve landscape/ townscape Decrease vacant units in town centres?

	Make land available for business development	
Option 5: New Settlement	Encourage healthy lifestyles Will reduce crime Reduce fear of crime Improve accessibility of shopping facilities Reduce homelessness Provide enough housing Increase range and affordability of housing Increase green space Sustainable use of minerals Increase recycling Reduce need for local travel Increase car journeys Reducing energy consumption Increase proportion of energy needs met by renewable sources Reduce underused land Improve landscape/ townscape Improve business development Promote growth in key sectors Economic performance Decrease vacant units in town centres Improve accessibility to work Reduce journey times between employment areas Increase consumption of local goods Encourage indigenous business Encourage inward investment Make land available for business development	Access to health facilities Access key local services Improve access to cultural facilities Loss agricultural land Decline in farmland birds Reduce rural diversification
Question SS4: Option1: No Change (groups up to 3 dwellings)	Encourage healthy lifestyles Provide enough housing Increase range and affordability of housing Reduce underused land	Access key local services Accessibility of shopping facilities Access child care Access to job opportunities Loss of Greenfield land Loss agricultural land Effect traffic volumes Reduce need for local travel Increase car journeys Decline in farmland birds Increase commuting Improve accessibility to work
Question SS4: Option2: Groups from	Provide enough housing	Access key local services



5-6 dwellings	Increase range and affordability of housing Reduce underused land	Accessibility of shopping facilities Access child care Reduce satisfaction with neighbourhood Engagement in decision making Involvement in volunteer activities Loss of Greenfield land Loss agricultural land Effect traffic volumes Increase need for local travel Increase car journeys Increase energy consumption? Decline in farmland birds Impact on landscape/ townscape Increase commuting Reduce accessibility to work
Question SS4: Option3: Groups from 10-12 dwellings	Reduce homelessness Provide enough housing Increase range and affordability of housing Reduce underused land	Access key local services Accessibility of shopping facilities Access child care Reduce access to job opportunities Reduce satisfaction with neighbourhood Engagement in decision making Involvement in volunteer activities Effect traffic volumes Increase need for local travel Increase car journeys Reducing energy consumption Impact on targets of Suffolk Biodiversity Action Plan Decline in farmland birds Impact on landscape/ townscape Reduce range of employment opportunities Increase commuting Reduce accessibility to work
Question SS4: Option4: Groups up to 15 dwellings	Provide enough housing Increase range and affordability Reduce underused land	Health facilities Increase crime Increase fear of crime Increase noise and odours Access key local services Accessibility of shopping facilities Access child care Job opportunities Satisfaction with neighbourhood

		Engagement in decision making Involvement in volunteer activities Loss agricultural land Effect traffic volumes Increase need for local travel Increase car journeys Impact on landscape/ townscape Increase commuting Reduce accessibility to work
Question H2: Option 1: Target of less than 500 new affordable homes per 5-year period	Reduce poverty Reduce homelessness Provide enough housing Increase range and affordability of housing Satisfaction of neighbourhood Reduce commuting Improve accessibility to work	Loss of Greenfield land Loss agricultural land
Question H2: Option 2 Target of 500 new affordable homes per 5-year period	Reduce poverty Reduce homelessness Provide enough housing Increase range and affordability of housing Satisfaction of neighbourhood Reduce commuting Improve accessibility to work	Loss of Greenfield land Loss agricultural land
Question H2: Option 3: Target of 600 new affordable homes per 5-year period	Reduce poverty Reduce homelessness Provide enough housing Increase range and affordability Satisfaction of neighbourhood Reduce commuting Improve accessibility to work	Loss of Greenfield land Loss agricultural land
Question H2: Option 4: Target of 700 new affordable homes per 5-year period	Reduce poverty Reduce homelessness Provide enough housing Increase range and affordability of housing Satisfaction of neighbourhood Reduce commuting Improve accessibility to work	Loss of Greenfield land Loss agricultural land
Question H2: Option 5: Target of more than 700 new affordable homes per 5-year period	Reduce poverty Reduce homelessness Provide enough housing Increase range and affordability	Loss of Greenfield land Loss agricultural land

	Satisfaction of neighbourhood Reduce commuting Improve accessibility to work	
Question H4: Option 1: Reduce the percentage affordable housing required to below 35%	Reduce poverty Reduce homelessness Increase range and affordability of housing Satisfaction of neighbourhood	
Question H4: Option 2: Leave it at 35%	Reduce poverty Reduce homelessness Increase range and affordability of housing Satisfaction of neighbourhood	
Question H4: Option 3: Increase it above 40%	Reduce poverty Reduce homelessness Increase range and affordability of housing Satisfaction of neighbourhood	Not providing enough housing
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	Reduce poverty Reduce homelessness Increase range and affordability of housing Satisfaction of neighbourhood	
Question H5: Option 2: Standard percentage and lower thresholds	Reduce poverty Reduce homelessness Increase range and affordability of housing Satisfaction of neighbourhood	
Option 1: Plan for provision through expansion of existing sites	Reduce poverty Reduce homelessness Provide enough housing Increase range and affordability of housing	Health facilities Reduction in Qualifications Access key local services Accessibility of shopping facilities Reduce satisfaction with neighbourhood Reduce access to cultural facilities Loss of Greenfield land Loss agricultural land Increase need for local travel Impact on landscape/ townscape Increase commuting Reduce accessibility to work
Option 2: Plan for provision through entirely new sites	Reduce poverty Reduce homelessness Provide enough housing	

Option 3: Plan for provision through a combination of Option 1 and 2	Reduce poverty Reduce homelessness Provide enough housing Increase range and affordability of housing	
Option 4: Plan for provision through rural exceptions site policies	Reduce poverty Reduce homelessness Provide enough housing Increase range and affordability of housing Will it reduce commuting Improve accessibility to work	Health facilities Reduction in Qualifications Access key local services Accessibility of shopping facilities Access child care Reduce access to cultural facilities Loss of Greenfield land Loss agricultural land Increase need for local travel
Option 5: Plan for provision through planned sites wherever major developments come through	Health facilities Improve Qualifications Reduce poverty Access key local services Accessibility of shopping facilities Access child care Reduce homelessness Provide enough housing Increase range and affordability Improve access to cultural facilities Reduce need for local travel Will it reduce commuting Improve accessibility to work	Loss of Greenfield land Loss agricultural land
Question EMP5: Option EMP1: Maintain current allocations and seek to gain increases in land availability	Reduce poverty Access key local services Unemployment Job opportunities Satisfaction of neighbourhood Reduce need for local travel Improve business development Economic performance Will it reduce commuting Improve accessibility to work Make land available for business development	Loss of Greenfield land Loss agricultural land
Question EMP5: Option EMP2: Maintain current allocations and allocate new sites	Reduce poverty Unemployment Job opportunities	Reduce business development Economic performance Land available for business development
Question EMP5: Option EMP3: Maintain	Reduce poverty	Access key local services

existing sites and allocate at local centres and more rural locations	Unemployment Job opportunities Satisfaction of neighbourhood Reduce need for local travel Improve business development Economic performance Rural diversification Make land available for business development	Loss of Greenfield land Loss agricultural land Increase commuting Reduce accessibility to work
Question EMP5: Option EMP4: De-allocate some sites not already developed and allocate elsewhere	Reduce poverty Unemployment Job opportunities Improve business development Economic performance Make land available for business development	
Question EMP5: Option EMP5: Concentrate on provision of new employment land in the same locations as residential development, or through mixed use developments	Reduce poverty Access key local services Unemployment Job opportunities Satisfaction of neighbourhood Reduce need for local travel Improve business development Economic performance Reduce commuting Improve accessibility to work Make land available for business development	Loss of Greenfield land Loss agricultural land
Question NBE2: Option 1: Development which cannot be located away from flood risk should contribute towards mitigation	Satisfaction of neighbourhood Quality of water Minimise risk of flooding Risk damage from storms	
Question NBE2: Option 2: Development which cannot be located away from flood risk does not need to contribute towards mitigation		Satisfaction with neighbourhood Quality of water Risk of flooding Risk damage from storms
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.	Satisfaction of neighbourhood Quality of water Minimise risk of flooding Risk damage from storms	
Question NBE4: Option 1: Locate	Health facilities	Not reducing underused land

development away from sources of pollution and develop in areas which minimise the use of the car	Death rates Healthy lifestyles Reduce noise and odours Access key local services Accessibility of shopping facilities Access child care Satisfaction of neighbourhood Quality of air Effect traffic volumes Reduce need for local travel Reduce car journeys Reducing energy consumption Improve landscape/ townscape Promote growth in key sectors	
Question NBE4:Option 2: Allow development in areas where air quality is an issue only if mitigation measures are put in place	Healthy lifestyles Reduce noise and odours Satisfaction of neighbourhood Effect traffic volumes Reduce need for local travel Reducing energy consumption Increase proportion of energy needs met by renewable sources	Not providing enough housing Reduce range and affordability of housing Quality of air
Question NBE4:Option 3: Develop a specific air quality management policy	Health facilities Death rates Healthy lifestyles Reduce noise and odours Access key local services Accessibility of shopping facilities Access child care Satisfaction of neighbourhood Quality of air Effect traffic volumes Reduce need for local travel Increase car journeys Reducing energy consumption Increase proportion of energy needs met by renewable sources Improve landscape/ townscape Improve accessibility to work Increase freight transported	Not providing enough housing Reduce range and affordability of housing Reduce rural diversification
Question SUS6 Option1: National Minimum Standard	Sustainable use of minerals Sustainable use of water Reduce household waste Increase recycling	

	Reducing energy consumption Increase proportion of energy needs met by renewable sources	
Question SUS6 Option2: higher Standards introduced a year earlier	Death rates Sustainable use of minerals Sustainable use of water Reduce household waste Increase recycling Reducing energy consumption Increase proportion of energy needs met by renewable sources	
Question SUS7: Option1: All new build and conversions in excess of 1 room.	Sustainable use of minerals Sustainable use of water Reduce household waste Increase recycling Reducing energy consumption Increase proportion of energy needs met by renewable sources	
Question SUS7: Option 2: All new developments of 1 dwelling and above	Sustainable use of minerals Sustainable use of water Reduce household waste Increase recycling Reducing energy consumption Increase proportion of energy needs met by renewable sources	
Question SUS7: Option 3: All development 3 dwellings and above	Sustainable use of minerals Sustainable use of water Reduce household waste Increase recycling Reducing energy consumption Increase proportion of energy needs met by renewable sources	
Question SUS8: Option1: National minimum standards (Building reg's)	Reducing energy consumption Increase proportion of energy needs met by renewable sources Improve business development Economic performance Encourage inward investment	
Question SUS8: Option2: BREEAM Good standard	Sustainable use of water Reducing energy consumption Increase proportion of energy needs met by renewable sources Improve business development Economic performance Encourage inward investment	

Question SUS8: Option3: BREEAM Very Good standard	Reducing energy consumption Increase proportion of energy needs met by renewable sources Maintain designated sites Deliver targets of Suffolk Biodiversity Action Plan Improve business development Economic performance Will it reduce commuting Improve accessibility to work Encourage indigenous business Encourage inward investment	
Question SUS8: Option4: BREEAM Excellent standard	Sustainable use of minerals Sustainable use of water Increase recycling Reduce need for local travel Increase car journeys Reducing energy consumption Increase proportion of energy needs met by renewable sources? Deliver targets of Suffolk Biodiversity Action Plan Improve business development Promote growth in key sectors Economic performance Will it reduce commuting Increase consumption of local goods Encourage indigenous business Encourage inward investment	
Question SUS9: Option1: All developments of 1 room or more	Sustainable use of minerals Sustainable use of water Reduce need for local travel Increase car journeys Reducing energy consumption Increase proportion of energy needs met by renewable sources? Deliver targets of Suffolk Biodiversity Action Plan Improve business development Economic performance Will it reduce commuting Encourage indigenous business Encourage inward investment	

Question SUS9: Option2: Development over 0.1 Ha or 100 sq m	Reducing energy consumption Increase proportion of energy needs met by renewable sources? Maintain designated sites Improve business development Economic performance Will it reduce commuting Improve accessibility to work Encourage indigenous business Encourage inward investment	
Question SUS9: Option3: Development over 1 Ha or 1000 sq m	Reducing energy consumption Increase proportion of energy needs met by renewable sources Improve business development Economic performance Encourage inward investment	
Question SUS10: Option 1: No requirement	Increase proportion of energy needs met by renewable sources Improve business development Economic performance Encourage inward investment	
SUS10: Option 2: national or regional requirement	Increase proportion of energy needs met by renewable sources Improve business development Economic performance Encourage inward investment	Impact on landscape/ townscape
SUS11: Option1: No requirement for decentralised renewable energy.	Improve business development Economic performance Encourage inward investment	Reduce proportion of energy needs met by renewable sources Risk of flooding Risk damage from storms
SUS11: Option2: At least 25% decentralised renewable energy.	Increase proportion of energy needs met by renewable sources Minimise risk of flooding Risk damage from storms Improve business development Economic performance Rural diversification Encourage inward investment	Impact on landscape/ townscape
SUS12: Option1: Applies to all developments	Increase recycling Increase proportion of energy needs met by renewable sources Minimise risk of flooding	Impact on landscape/ townscape

	- Risk damage from storms - Improve business development - Promote growth in key sectors - Economic performance - Encourage indigenous business - Encourage inward investment	
SUS12: Option2: Above 1 dwelling or 100 sq m non-residential floorspace	- Increase proportion of energy needs met by renewable sources? - Improve business development - Economic performance - Rural diversification - Encourage inward investment	Impact on landscape/ townscape
Question R2: Option 1: Business as usual	- Will reduce crime - Reduce fear of crime - Access key local services - Accessibility of shopping facilities - Unemployment - Job opportunities - Satisfaction of neighbourhood - Effect traffic volumes - Reduce need for local travel - Increase car journeys - Reducing energy consumption? - Reduce underused land - Improve landscape/ townscape - Increase range of employment opportunities - Decrease vacant units in town centres - Will it reduce commuting - Improve accessibility to work - Increase consumption of local goods - Encourage indigenous business - Encourage inward investment - Make land available for business development	
Question R2: Option 2: Promote and enhance local and town centres	- Will reduce crime - Reduce fear of crime - Access key local services - Accessibility of shopping facilities - Unemployment - Job opportunities - Satisfaction of neighbourhood - Effect traffic volumes - Reduce need for local travel	

	Increase car journeys Reducing energy consumption? Reduce underused land Improve landscape/ townscape Increase range of employment opportunities Decrease vacant units in town centres? Will it reduce commuting Improve accessibility to work Increase consumption of local goods Encourage indigenous business Encourage inward investment Make land available for business development	
Question R2: Option 3: Retail and management strategy for Sudbury and Hadleigh town centres	Will reduce crime Reduce fear of crime Accessibility of shopping facilities Unemployment Job opportunities Reducing energy consumption? Improve landscape/ townscape Increase range of employment opportunities Decrease vacant units in town centres? Will it reduce commuting Improve accessibility to work Increase consumption of local goods Encourage indigenous business Encourage inward investment Make land available for business development	Access key local services Satisfaction with neighbourhood Increase car journeys Not reducing underused land
Question SCI2: Should green infrastructure be considered in policy documents? (Either Core Strategy or Development Control Policies)	Healthy lifestyles Satisfaction of neighbourhood Increase green space Improve landscape/ townscape	
Question SC13: Option 1: All of equal importance	Health facilities Healthy lifestyles Improve Qualifications Access key local services Accessibility of shopping facilities Access child care Satisfaction of neighbourhood Increase green space Improve access to cultural facilities Effect traffic volumes Reduce need for local travel	

	Increase journeys by methods other than personal car	
Question SC13: Option 2: Some of greater importance than others	Health facilities Improve Qualifications	Increase crime Increase fear of crime Accessibility of shopping facilities Not increase green space Reduce access to cultural facilities Effect traffic volumes Increase need for local travel Increase journeys by methods other than personal car
Question SC14: Option 1: Threshold applied above which contributions required	Increase green space	
Question SC14: Option 2: S106/case by case assessment	Health facilities Improve Qualifications Will reduce crime Reduce fear of crime Access key local services Access child care Provide enough housing Increase green space	
Question SCI 5: That the provisions of SCI should be addressed through either Core Strategy or Development Control Policies documents.	Health facilities Improve Qualifications Will reduce crime Reduce fear of crime Access key local services Accessibility of shopping facilities Access child care Satisfaction of neighbourhood Increase green space Improve access to cultural facilities Effect traffic volumes	
Question INF2: Option1: BAU- secure infrastructure through case by case assessment- s106	Will reduce crime Reduce fear of crime Quality of water Increase recycling Effect traffic volumes Increase journeys by methods other than personal car Increase proportion of energy needs met by renewable sources Minimise risk of flooding Improve accessibility to work Increase freight transported	Discourage inward investment



Question INF2: Option 2: Implement a tariff based approach	Will reduce crime Reduce fear of crime Quality of water Increase recycling Effect traffic volumes Increase journeys by methods other than personal car Reducing energy consumption Increase proportion of energy needs met by renewable sources? Minimise risk of flooding Improve accessibility to work Increase freight transported	Not providing enough housing
Question INF2: Option 3: Make provision for large scale infrastructure requirements	Will reduce crime Reduce fear of crime Provide enough housing Satisfaction of neighbourhood Effect traffic volumes Increase journeys by methods other than personal car Reducing energy consumption Increase proportion of energy needs met by renewable sources Minimise risk of flooding Improve business development Economic performance Improve accessibility to work Increase freight transported	

Option 4: Secure grant funding from national government for bigger projects.	Will reduce crime Reduce fear of crime Provide enough housing Satisfaction of neighbourhood Quality of water Effect traffic volumes Increase journeys by methods other than personal car Reducing energy consumption Increase proportion of energy needs met by renewable sources Minimise risk of flooding Improve business development Economic performance Improve accessibility to work Increase freight transported Encourage inward investment	
---	---	--

9. Broad Locations Assessment

Introduction

- 9.1 Nine broad locations for new development identified in the Growth Scenarios and Broad Locations Core Strategy document were subject to an assessment in order to determine their performance in sustainability terms, with reference to social, environmental and economic factors. This work was undertaken in 2010. These locations represented urban extensions of Sudbury (4 broad locations), Hadleigh (3 broad locations) and Ipswich (two broad locations) as shown on the Key Diagram on Figure 9.1.
- 9.2 The rationale used for the broad locations assessment, the assessment results and a discussion of the relative merits and disadvantages of the broad location options identified, highlighting the most and least sustainable options, are set out below.

Assessment Framework

- 9.3 The methodology for the Broad Locations Assessment is explained in Section 2. This section gives further explanation relating to the specific framework used for the assessment of the strategic locations for the implementation of the Core Strategy.
- 9.4 Existing SA guidance recognises that the most familiar form of SA prediction and evaluation is generally broad-brush and qualitative. It is recognised that quantitative predictions are not always practicable and broad-based and qualitative predictions can be equally valid and appropriate.
- 9.5 The assessment was based on following information and tools:
- Maps of each broad location, provided by the Council;
 - Index of Multiple Deprivation, Suffolk Results, Suffolk County Council, January 2008;
 - Natural and Built Environmental Constraints maps, provided by the Council;
 - Environment Agency (EA) flood risk maps (www.environment-agency.gov.uk);
 - Google Earth maps in order to gain an aerial view of the broad locations, to assess broad locations' accessibility, their position within the local landscape, and to ascertain distances to the nearest settlements and local services and facilities, as well as the availability of the latter;
 - Multi-Agency Geographic Information for the Countryside (www.magic.gov.uk) constraints maps for Agricultural Land Classification (ALC) and statutory designations; and
 - Natural England England's interactive mapping website (www.natureonthemap.org.uk) for ecological designations and Biodiversity Action Plan (BAP) Priority Habitats; and
 - Babergh District Council Preliminary Review (Stage 1) of Issues and Options Core Strategy Report (March 2009) to inform the Habitats Regulations Assessment, October 2009.
- 9.6 For the assessment of the broad locations there was a need to devise location specific SA criteria to cover, for example, accessibility to schools, healthcare facilities and other community services, accessibility to public transport routes, opportunities to promote non-motorised transport modes, identify specific environmental constraints and establish the proposed broad locations' uses. Table 9.1 below presents the SA Framework adapted for the assessment of the broad locations including decision-making criteria and indicators and indicating the conformity/non-conformity assessment scale for each indicator considered.



- 9.7 Three SA objectives were excluded from the original SA framework devised during the scoping stage of the SA/SEA, as the indicators developed to measure the progress in achieving these objectives, were deemed to be beyond the sphere of influence of the broad locations' allocation process. These objectives are as follows:
- Objective 3: To reduce crime and anti-social activity;
 - Objective 11: To use water and mineral resources efficiently, and re-use and recycle where possible; and
 - Objective 12: To reduce waste.

Table 9.1 - Broad Locations Assessment Framework

SA Objective		Decision Making Criteria	Indicator	Conformity/Non-conformity
Social				
1	To improve the health of the population overall	Is there adequate access to health facilities?	Is it within 30 mins of a GP, dentist and hospital by public transport?	Yes / Restricted / No
		Will it encourage healthy lifestyles?	Will it lead to a loss of public open space or open access land?	Possibly / No
			Will it improve accessibility by Public Rights of Way?	Yes / No
2	To maintain and improve levels of education and skills in the population overall	Will it improve qualifications and skills of young people?	Is it within 30 mins of a school by public transport?	Yes / Restricted / No
			Is it within walkable/cyclable distances (800m and 2-5km) to a school?	Yes / Restricted / No
4	To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	Will the broad location be adjacent or within LSOAs in the most deprived 20% to 40% in the country?	Yes / No
5	To improve access to key services for all sectors of the population	Will it improve accessibility to key local services?	Is it within 30 mins of the town centre by public transport?	Yes / Restricted / No
			Is it within walkable/cyclable distances (800m and 2-5km) to key services?	Yes / Restricted / No
		Will it improve accessibility to shopping facilities?	Is it within 30 mins of a supermarket/ shopping centre by public transport?	Yes / Restricted / No
			Is it within walkable/cyclable distances (800m and 2-5km) to supermarkets/shopping centre?	Yes / Restricted / No
		Will it improve accessibility and decrease the need of travel?	Is the broad location proposed for mixed-use development with good accessibility to local facilities?	Yes / No
6	To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce the unemployment overall?	Is the broad location proposed for employment or mixed use with employment included?	Yes / No



SA Objective		Decision Making Criteria	Indicator	Conformity/Non-conformity
7	To meet the housing requirements of the whole community	Will it increase the range and affordability of housing for all social groups?	Is the broad location proposal over the relevant thresholds for the application of affordable housing policy? Babergh Local Plan policy HS08 specifies that broad locations 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 broad locations 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.	Yes / No
8	To improve the quality of where people live and encourage community participation	Will it increase access to natural green space?	Is the broad location proposed in an area with accessible natural green space?	Yes / No
Environmental				
9	To maintain and where possible improve water quality	Will it avoid development in areas protected for water quality reasons?	Is the broad location proposed within a groundwater source protection zone?	Yes (the whole location within zone 1 - Inner protection) / Partially or within zones 2 and 3 / No
10	To maintain and where possible improve air quality	Will it improve air quality?	Is the broad location proposed within an Air Quality Management Area (AQMA)?	Yes / Partially / No
11	To conserve soil resources and quality	Will it minimise the loss of Greenfield land to development?	Is the broad location proposed on Greenfield land?	Yes / Partially / No
		Will it minimise the loss of the best and most versatile agricultural land to development?	Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3a)?	Yes / Partially / No
		Will it maintain and enhance soil quality?	Will it lead to remediation of contaminated land?	Yes / No
14	To reduce the effects of traffic on the environment	Will it decrease the need for local travel?	Does the broad location have good accessibility to local facilities (as assessed above)?	Yes / Partially / No



SA Objective		Decision Making Criteria	Indicator	Conformity/Non-conformity
15	To reduce emissions of greenhouse gases from energy consumption	Will it increase the proportion of energy needs being met by renewable sources?	Will the broad location proposal promote the incorporation of small-scale renewable in developments?	Yes / No
16	To reduce vulnerability to climatic events	Will it minimise the risk of flooding to people and property from rivers and watercourses?	Does the broad location lie within the flood risk zones (2, 3a, 3b) identified in the SFRA and have a proposed 'non-compatible' use or is located within 9m of a river?	Yes / Partially / No
17	To conserve and enhance biodiversity and geodiversity	Will it maintain and enhance sites designated for their nature conservation interest?	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.	Yes - the Location within 4km of European site and 2km of SSSI/ Location is within 4km of SSSI/ No
			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.	Yes - the whole Location within 500m of designation/Part of the location is within 500m/ No
		Will it avoid disturbance or damage to protected species and their habitats?	Are BAP habitats known to be represented within the broad location?	Yes - predominant portion of Location contains BAP habitats / Smaller parts of Location contain BAP habitats/ No



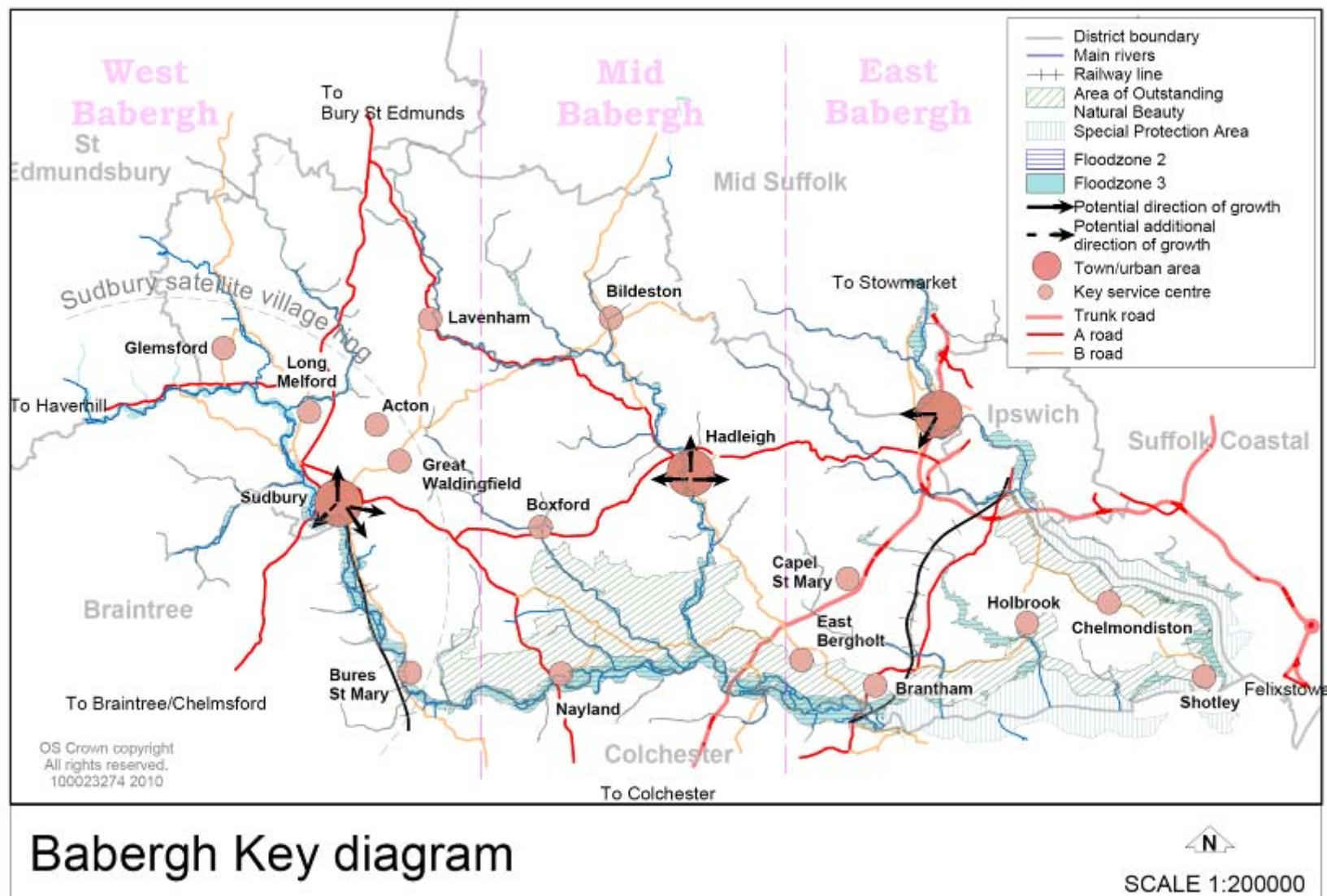
SA Objective		Decision Making Criteria	Indicator	Conformity/Non-conformity
		Will it protect and enhance sites, features and areas of geological value?	Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS (Regionally Important Geological/Geomorphological Sites). The broad 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.	Yes - the whole Location within 500 m /Part of the location within 500m or 1 km /No
18	To conserve and where appropriate enhance areas of historical and archaeological importance	Will it protect and enhance sites, features and areas of historical and cultural value?	Are there any listed buildings on or adjacent to the broad location?	Yes / No
			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.	Yes / Partially or in Proximity/ No
			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.	Yes / Partially on in Proximity/ No
			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.	Yes / Partially or in Proximity/ No
		Will it protect and enhance sites, features and areas of archaeological value?	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.	Yes - the whole Location falls within such area/ Partially or located in Proximity/ No



SA Objective		Decision Making Criteria	Indicator	Conformity/Non-conformity
19	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Will it improve the landscape or townscape?	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.	Yes / No
			Is the broad location in or adjacent to areas of designated landscapes (AONB, Environmentally Sensitive Areas)?	Yes / Partially and Adjacent / No
			Will the broad location development lead to coalescence of urban extensions with nearby villages?	Yes / No
Economic				
20	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Will it improve business development and enhance competitiveness?	Is the broad location proposed for mixed-use development or employment?	Yes / No
21	To revitalise town centres	Will it increase the range of employment opportunities, shops and services available in town centres?	Is the broad location proposed for mixed-use development or employment in town centres?	Yes / No
22	To encourage efficient patterns of movement in support of economic growth	Will it improve accessibility to work by public transport, walking and cycling?	Is the broad location proposed in a proximity to a public transport route or in a walkable/cyclable distance?	Yes / No
23	To encourage and accommodate both indigenous and inward investment	Will it make land available for business development?	Will it increase employment land availability?	Yes / No

Note: For some criteria/indicators, the whole range of possible effect is not applicable, as they represent just negative or positive screening criteria.

Figure 9.1 - Key Diagram in Growth Scenarios and Broad Locations Core Strategy



Assessment Results

- 9.8 Table 9.2 below sets out a summary of the assessments results for the broad locations proposed for development. Appendix A (Appendices, Part III) provides more detailed assessment results for each broad location.
- 9.9 The broad locations were found to perform with a comparable level of positive effects against a number of the SA objectives. Although the assessment against these objectives did not allow for differentiation between the broad locations due to the level of detail available, it highlighted the areas where the development of the broad locations would generate positive sustainability effects. The SA objectives concerned were:
- Objective 7 - *To meet the housing requirements of the whole community.* As all the broad locations will accommodate substantial numbers of housing, including affordable housing, they are expected to benefit this SA objective.
 - Objective 6 - *To offer everybody the opportunity for rewarding and satisfying employment.* All the broad locations would be capable of accommodating larger sites and it is likely that these sites will be expected to provide a mix of uses, including employment and community facilities, which should provide new employment opportunities in the area.
 - Objective 15 - *To reduce emissions of greenhouse gases from energy consumption.* The size of all the broad locations will allow for development proposals to incorporate the required proportion of energy from decentralised and renewable or low-carbon sources.
 - Objectives 20 and 23 - *To achieve sustainable levels of prosperity and economic growth throughout the plan area; to encourage and accommodate both indigenous and inward investment.* All the broad locations are deemed to be equally beneficial against these economic objectives through the accommodation of employment and mixed uses and ensuring an adequate provision of this type of land use for the future development in the District; also refer to explanation in Objective 6.
- 9.10 All the broad locations performed well against the social SA objectives mainly as a result of their good accessibility by public transport to the key services and facilities, including health care facilities, schools, employment, supermarkets and shopping areas. Broad locations 2, 3 and 9 performed the best in terms of accessibility, potentially providing walkable access to the key services and facilities. Good levels of accessibility reflected the urban extension nature of all the broad locations. All the broad locations also had a good access to natural green space which may stimulate social mixing and interaction, benefiting SA objective 8 (*encourage community participation*). Development within broad location 6 in the east of Sudbury may also provide regeneration opportunities, as it is partially situated in the area with higher deprivation levels (amongst 40% of most deprived Lower Super Output Areas in the country), delivering benefits against SA objective 4 (*poverty and social exclusion*).
- 9.11 The assessment against the SA environmental objectives provided the most differentiation between the broad locations. Flood constraints were identified for parts of broad locations 2, 3, 4 and 9, which mainly related to river bodies crossing the locations.
- 9.12 Broad locations 1, 3, 4, 6, 7 and 9 were found to be situated in proximity (within 2km or 4km distance) to SSSI sites designated for their ecological value. Broad location 8 and 9 (Ipswich fringe) were situated in proximity not only to the SSSI but also to the European site, a Special Protection Area.
- 9.13 Parts of broad locations 2, 3 and 4 lied within urban Conservation Areas. Broad locations 6 and 8 are adjacent to the Historic Parks and Gardens. One Scheduled Monument is located within broad location 2 and another is adjacent to broad location 5. All the broad locations contain sites of archaeological interest. Their size is comparatively small to the size of the broad locations,

apart from broad location 3 where sites of archaeological interest occupy a significant area within the location. All the broad locations apart from locations 1, 5 and 6 also had some degree of landscape constraints being adjacent or located within the Special Landscape Areas and Environmentally Sensitive Areas.

- 9.14 All the broad locations performed equally well against the SA economic objectives as a result of accommodating employment and other uses and providing good and encouraging efficient patterns of movement in support of economic growth as outlined above.
- 9.15 Overall, broad location 5, north of Sudbury, was deemed to perform the best in sustainability terms, as it had fewer environmental constraints compared to all other locations. Broad location 6, east of Sudbury, even though being located in relative proximity to SSSI, was also rated well overall in sustainability terms. Broad location 1, east of Hadleigh, was associated with comparatively lower level of constraints as well.
- 9.16 The results of the assessment indicated that broad locations 2 and 9, west of Hadleigh and South West Ipswich Fringe, performed least favourable overall in sustainability terms, having the highest number of the environmental constraints. Broad location 4, west of Sudbury, was also significantly constrained.
- 9.17 The rest of the broad locations (locations 3, 6, 7 and 8) had a comparable level of constraints identified. However, it is believed that the size of each of the broad locations offers the potential for avoiding or mitigating most of the possible negative effects. The findings of this assessment together with that of the HRA Screening informed the next stages of the Core Strategy development and will inform the future site allocation process.



Table 9.2 - Summary of Assessment Results for Broad Locations

SA Objective and Indicator		Hadleigh - Broad Location	Hadleigh - Broad Location	Hadleigh - Broad Location	Sudbury - Broad Location	Sudbury - Broad Location 5	Sudbury - Broad Location 6	Sudbury - Broad Location 7	Ipswich Fringe - Broad Location 8	Ipswich Fringe - Broad Location 9
Social										
1	Is it within 30 mins of a GP, dentist and hospital by public transport?									
	Will it lead to a loss of public open space or open access land?									
	Will it improve accessibility by Public Rights of Way?									
2	Is it within 30 mins of a school by public transport?									
	Is it within walkable/cyclable distances (800m and 2-5km)?									
4	Will the broad location be situated near or within LSOAs in the most deprived 20% to 40% in the country?									
5	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?									
6	Is the broad location proposed for employment or mixed use with employment included?									



SA Objective and Indicator		Hadleigh - Broad Location	Hadleigh - Broad Location	Hadleigh - Broad Location	Sudbury - Broad Location	Sudbury - Broad Location 5	Sudbury - Broad Location 6	Sudbury - Broad Location 7	Ipswich Fringe - Broad Location 8	Ipswich Fringe - Broad Location 9
7	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.									
8	Does the broad location have a good access to natural green space?									
Environmental										
9	Is the broad location proposed within a groundwater source protection zone?									
10	Is the broad location proposed within an Air Quality Management Area (AQMA)?									
11	Is the broad location proposed on Greenfield land?									
	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	Does the broad location have good accessibility to local facilities (as assessed above)?									
15	Will the broad location proposal promote the incorporation of small-scale renewable in developments?									
16	Does the broad location lie within the flood risk zones (2, 3a, 3b) identified in the SFRA and have a proposed 'non-compatible' use or is located within 9m of a river?									



SA Objective and Indicator		Hadleigh - Broad Location	Hadleigh - Broad Location	Hadleigh - Broad Location	Sudbury - Broad Location	Sudbury - Broad Location 5	Sudbury - Broad Location 6	Sudbury - Broad Location 7	Ipswich Fringe - Broad Location 8	Ipswich Fringe - Broad Location 9
17	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.									
	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.									
	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	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 criterion) 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 and Indicator		Hadleigh - Broad Location	Hadleigh - Broad Location	Hadleigh - Broad Location	Sudbury - Broad Location	Sudbury - Broad Location 5	Sudbury - Broad Location 6	Sudbury - Broad Location 7	Ipswich Fringe - Broad Location 8	Ipswich Fringe - Broad Location 9
	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	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?									
Economic										
20	Is the broad location proposed for mixed-use development or employment?									
21	Is the broad location proposed for mixed-use development or employment in town centres?									
22	Is the broad location proposed in a proximity to a public transport route or in a walkable/cyclable distance?									
23	Will it increase employment land availability?									



10. Growth Scenarios

Introduction

- 10.1 BDC considered a total of eight Growth Scenarios for the Core Strategy, four for housing growth and four for employment growth.
- 10.2 Housing Growth Scenarios:
- Scenario 1: Balancing housing and economic growth
 - Scenario 2: Address affordable housing needs and market housing needs
 - Scenario 3: Depressed market and continuing the existing level of development
 - Scenario 4: Market intervention / quick market recovery and continuation of existing level of development
- 10.3 Employment Growth Scenarios:
- Scenario 1: "Business as usual"
 - Scenario 2: 'Shortfall' forecast figure and one-third of the former RSS jobs target
 - Scenario 3: Shortfall forecast figure and percentage growth to the jobs target up to 2031
 - Scenario 4: Jobs growth target in accordance with housing growth target
- 10.4 The SA Framework, as developed by SSAG and BDC, used to undertake the assessment is shown in Table 6.1. Further detail relating to the scoring methodology for assessment is included in Section 2.
- 10.5 The results of the detailed appraisal of the potential effects predicted to arise as a result of the implementation of the Core Strategy Scenarios are included in Appendix B (Appendices Part III). The section below presents an analysis of the detailed appraisal in terms of the significance of direct effects and potential cumulative effects and recommendations for improving the sustainability of the various scenarios under consideration..Suggestions for mitigation of adverse effects or enhancement of positive ones are also set out.

Results of the Assessment of the Growth Scenarios

- 10.6
- 10.7
- 10.8

10.9 Table 10.1 presents a summary of the significance of direct effects appraisal.

Table 10.1 - Summary of Significance of Direct Effects of Growth Options

SA Objective		Housing				Employment			
		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 1	Scenario 2	Scenario 3	Scenario 4
1	To improve the health of the population overall	+	+	+	+	+	+	+	+
2	To maintain and improve levels of education and skills in the population overall	++	0	0	0	+	++	++	+
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	+++	0	0	0	++	+++	++	++
7	To meet the housing requirements of the whole community	++	+++	+	+	0	0	0	++
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	-	-	-	-	-	-	-	-

SA Objective		Housing				Employment			
		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 1	Scenario 2	Scenario 3	Scenario 4
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	-	-	-	-	-	-	-	-
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	-	-	-	-	-	-	-	-
20	To achieve sustainable levels of prosperity and economic growth throughout the plan area	+++	0	0	0	++	+++	+++	+
21	To revitalise town centres	++	0	0	0	++	+++	++	+
22	To encourage efficient patterns of movement in support of economic growth	+++	0	0	0	++	+++	+++	+
23	To encourage and accommodate both indigenous and inward investment	+++	0	0	0	++	+++	++	+



Assessment Summaries and Recommendations

Housing Scenarios

Scenario 1: Balancing housing and economic growth

- 10.10 It was predicted that this scenario will have a number of moderate to significantly positive effects against the SA objectives. Provision of higher numbers of housing developments will seek to address housing needs. This scenario is based on balancing housing growth with economic growth and it was predicted that it will improve access to key services such as employment, reduce poverty and social exclusion, improve educational skills and achieve economic growth in the district.
- 10.11 Moderately significant negative effects were predicted against SA objective 11, 15 and 17. Objective 11 seeks to protect soil resources and moderately negative effects are predicted due to the large amount of greenfield land to be developed over the plan period. Objective 15 seeks to reduce emissions of greenhouse gases from energy consumption and objective 17 seeks to conserve and enhance biodiversity in the district. High growth levels were predicted to impact on energy consumption and biodiversity.

Recommendations

- 10.12 Although only one significantly negative effect was predicted from the assessment of the policies in this component, a number of recommendations to improve performance of this scenario towards the achievements of the SA objectives are made below. More detail has subsequently emerged as the distribution and location of growth and the implications of this were considered as part of the Core Strategy preparation process as well as its effects on the environment..
- 10.13 It was recommended that consideration be given to the following aspects during the development of the submission Core Strategy, Site Specific Allocations and Development Management DPDs to mitigate negative effects and enhance positive effects predicted including:
- The effects of development on water quality and local air quality should be considered and how any negative impacts can be mitigated;
 - The provision of sustainable transport infrastructure and planting/greening to provide increased pollution sequestration should be considered and other ways of reducing the effects of traffic on the environment including ensuring that new sites for development should be within accessible distances to services and facilities and should be integrated with the green infrastructure network;
 - Inclusion of policies to reduce waste, increase recycling, and reduce emissions of greenhouse gases from energy consumptions should be considered;
 - Protection of geodiversity and biodiversity in line with national guidance;
 - Protection of sites of archaeological interest focusing on those which are important at the local level;
 - Protection of the historic character of the district and the quality and local distinctiveness of landscapes and townscapes;
 - Considering ways to reduce the vulnerability to climatic events;
 - A key consideration should be to ensure that appropriate levels and types of employment land are delivered in accessible locations; and



- The fragmentation of agricultural holdings should be avoided. The potential for development to be on brownfield land, ahead of greenfield land should be considered. This should include the use and remediation of potentially contaminated sites as the first priority.

Scenario 2: Address affordable housing needs and market housing needs

- 10.14 The approach to the provision of housing based on affordable housing needs in the district has led to the prediction of a range of moderately to significant positive effects against social and economic SA objectives. This includes for the provision of housing across the district by responding to specific identified affordable housing needs. This could help to reduce social exclusion and improve access to key services and facilities. The assessment highlighted that 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.
- 10.15 If this scenario was chosen housing numbers would significantly increase from existing levels of provision and it was predicted that this could result in significant negative effects against SA objective 11, 14, 15 and 17. Objective 11 seeks to protect soil resources and quantity, Objective 15 is aimed at reducing greenhouse emissions and Objective 17 is aimed at conserving and enhancing biodiversity and geodiversity in the district. Objective 14 seeks to reduce the effects of traffic on the environment.

Recommendations

- 10.16 Several significant negative effects were predicted from the assessment of this scenario but more detail will emerge once the distribution and location of growth and the implications of these are considered as part of the Core Strategy preparation process and what effects this will have on the environment. Nevertheless a number of recommendations to improve the performance of this scenario towards the achievements of the SA objectives are made below.
- 10.17 It is recommended that consideration be given to the following aspects during the development of the submission Core Strategy, Site Specific Allocations and Development Management DPDs to mitigate negative effects and enhance positive effects predicted including:
- The effects of development on water quality and local air quality should be considered in more detail.
 - The effects of development on geodiversity and biodiversity as well as on sites of archaeological interest and the historic character of the district and the quality and local distinctiveness of landscapes and townscapes should be considered in more detail and these should be protected.
 - The provision of sustainable transport infrastructure and planting/greening to provide increased pollution sequestration should be considered and other ways of reducing the effects of traffic on the environment including ensuring that new sites for development should be within accessible distances to services and facilities and should be integrated with the green infrastructure network;
 - Inclusion of policies to reduce waste, increase recycling, and reduce emissions of greenhouse gases from energy consumptions should be considered;
 - Considering ways to reduce the vulnerability to climatic events;
 - It would be beneficial if housing growth is balanced with employment growth in the district; and



- The fragmentation of agricultural holdings should be avoided. The potential for development to be on brownfield land, ahead of greenfield land should be considered. This should include the use and remediation of potentially contaminated sites as the first priority.

Scenario 3: Depressed market and continuing the existing level of development

- 10.18 The SA for this scenario predicted no significantly positive effects against the social and economic objectives. The scenario would provide for slightly lower levels of housing development than what we have experienced in the district between 2001 and 2010. Several positive effects have been predicted. These effects could be enhanced by appropriate policy formulation in the submission Core Strategy, Site Specific Allocations and Development Management DPDs.
- 10.19 In terms of the effects on environmental SA objectives, only one moderately negative effect was predicted on Objective 11. Several negative effects were predicted but as would be the case for the other growth scenarios more detail will emerge once the distribution and location of growth and the implications of this are considered as part of the Core Strategy preparation process and what effects this will have on the environment.

Recommendations

- 10.20 Although only one moderately significant negative effect was predicted from the assessment of this scenario, recommendations to improve performance of this scenario towards the achievements of the SA objectives are made below.
- 10.21 It is recommended that consideration be given to the following aspects during the development of the submission Core Strategy, Site Specific Allocations and Development Management DPDs to mitigate negative effects and enhance positive effects predicted, including:
- The effects of development on water quality, local air quality, emissions, waste, geodiversity and biodiversity, sites of archaeological interest, the historic character of the district and the quality and local distinctiveness of landscapes and townscapes, ways to reduce the vulnerability to climate change and access to services and employment should be considered; and
 - The fragmentation of agricultural holdings should be avoided. The potential for development to be on brownfield land, ahead of greenfield land should be considered. This should include the use and remediation of potentially contaminated sites as the first priority.

Scenario 4: Market intervention / quick market recovery and continuation of existing level of development

- 10.22 There is little difference in overall numbers between Scenarios 3 and 4 and there is little difference between the predicted sustainability effects. As with Scenario 3, no significantly positive effects against the social and economic objectives were predicted for Scenario 4. These effects could be enhanced by appropriate policy formulation in the submission Core Strategy, Site Specific Allocations and Development Management DPDs.
- 10.23 In terms of the effects on environmental SA objectives, only one moderately significant negative effect was predicted on Objective 11. Several negative effects were predicted but as would be the case for the other growth scenarios more detail will emerge once the distribution and location of growth and the implications of this are considered as part of the Core Strategy preparation process and what effects this will have on the environment.



Recommendations

- 10.24 Although only one moderately significant negative effect was predicted from the assessment of this scenario, recommendations to improve performance of this scenario towards the achievements of the SA objectives are made below.
- 10.25 It is recommended that consideration be given to the following aspects during the development of the submission Core Strategy, Site Specific Allocations and Development Management DPDs to mitigate negative effects and enhance positive effects predicted, including:
- The effects of development on water quality, local air quality, emissions, waste, geodiversity and biodiversity, sites of archaeological interest, the historic character of the district and the quality and local distinctiveness of landscapes and townscape, ways to reduce the vulnerability to climate change and access to services and employment should be considered; and
 - The fragmentation of agricultural holdings should be avoided. The potential for development to be on brownfield land, ahead of greenfield land should be considered. This should include the use and remediation of potentially contaminated sites as the first priority

Employment Scenarios

Scenario 1: “Business as usual”

- 10.21 The SA of Scenario 1 predicted a number of moderately significant positive effects against the social and economic objectives. The scenario seeks to provide everyone with an opportunity to employment and achieve growth in the key sectors of the local economy, as well as increased economic diversification. It also aims to improve the provision of employment within the district through the identification of a range of both strategic and local employment sites across the plan area, as well as diversifying the local economy. Several other positive effects were predicted against the social and economic objectives.
- 10.22 In terms of the effects on environmental SA objectives, a range of negative effects are predicted. These effect may, however, be offset to some extent through the inclusion of policies focussing on reducing impacts on the environment and reducing green house emissions.

Recommendations

- 10.23 It is recommended that policies be considered in the submission Core Strategy, Site Specific Allocations and Development Management DPDs that would mitigate the predicted effects against the environmental objectives.

Scenario 2: ‘Shortfall’ forecast figure and one-third of the former RSS jobs target

- 10.24 A number of moderately to significantly positive effects were predicted for this scenario against the social and economic objectives. This includes maintaining and improving skills in the district, reducing poverty and social inclusion, improving access to services, providing people with an opportunity to employment and improving the local economy by providing for high job growth over the next twenty years in the district. Several other positive effects were predicted against the social and economic objectives.
- 10.25 In terms of the effects on environmental SA objectives, a few significantly negative effects were predicted. These include loss of soil resources, increasing greenhouse emissions and loss of biodiversity. Several other negative effects were predicted against the environmental objectives. These effects, however, may be offset to some extent through the inclusion of policies focussing on reducing impacts on the environment and reducing green house emissions.



Recommendations

- 10.26 It is recommended that policies be considered in the submission Core Strategy, Site Specific Allocations and Development Management DPDs that would mitigate the predicted effects against the environmental objectives with particular emphasis on:
- Fragmentation of agricultural holdings should be avoided. The potential for development to be on brownfield land, ahead of Greenfield land should be considered. This should include the use and remediation of potentially contaminated sites as the first priority;
 - The provision of sustainable transport infrastructure and planning/ greening to provide increased pollution sequestration should be considered and other ways of reducing the effects of traffic on the environment including ensuring that new sites for development should be within accessible distances to services and facilities and should be integrated with the green infrastructure network;
 - Inclusion of policies to reduce waste, increase recycling, and reduce emissions of greenhouse gases from energy consumption should be considered; and
 - The effects of development on water quality and local air quality should be considered in more detail; and
 - The effects of development on geodiversity and biodiversity as well as on sites of archaeological interest and the historic character of the district and the quality and local distinctiveness of landscapes and townscape should be considered in more detail and these should be protected.

Scenario 3: Shortfall forecast figure and percentage growth to the jobs target up to 2031

- 10.27 A number of moderately positive to significantly positive effects were predicted for this scenario against the social and economic objectives, although for Scenario 2 more significantly positive effects were predicted than for this scenario. Moderately to significantly positive effects predicted for Scenario 3 includes maintaining and improving skills in the district, reducing poverty and social inclusion, improving access to services, providing people with an opportunity to employment and improving the local economy by providing for high job growth over the next twenty years in the district. Several other positive effects were predicted against the social and economic objectives.
- 10.28 In terms of the effects on environmental SA objectives, a few moderately significant negative effects were predicted against Objective 11, 15 and 17. These objectives are aimed at conserving soil resources, decreasing greenhouse emissions and conserving and enhancing biodiversity. Several other negative effects were predicted against the environmental objectives. These effects, however, may be offset to some extent through the inclusion of policies focussing on reducing impacts on the environment and reducing green house emissions.

Recommendations

- 10.29 It is recommended that policies be considered in the submission Core Strategy, Site Specific Allocations and Development Management DPDs that would mitigate the predicted effects against the environmental objectives (see Appendix B for full details).

Scenario 4: Jobs growth target in accordance with housing growth target

- 10.30 Two moderately significant positive effects were predicted for this scenario against the social and economic objectives. The scenario seeks to provide everyone with an opportunity to employment and meeting the housing requirements of the community. Several other positive effects were predicted against the social and economic objectives.



The significance of the positive effects could increase, depending on the exact numbers of jobs to be provided through this scenario.

- 10.31 In terms of the effects on environmental SA objectives, a range of negative effects were predicted. No significantly negative effects were predicated. Depending on the exact number of jobs to be provided, the significance of the negative effects could increase. These effects may, however, be offset to some extent through the inclusion of policies focussing on reducing impacts on the environment and reducing green house emissions.

Recommendations

- 10.32 It is recommended that policies be considered in the submission Core Strategy, Site Specific Allocations and Development Management DPDs that would mitigate the predicted effects against the environmental objectives (see Appendix B for full details)..

11. Assessment of Core Strategy Submission Draft Policies

Introduction

- 11.1 BDC has considered all of the consultation responses it has received on the 2009 Core Strategy Issues and Options report and the 2010 Core Strategy Future Growth of Babergh – 2031 report, including those pertinent to the SA. The consultation responses and subsequent actions are detailed in Appendix A (Appendices Part II) and Appendix C (Appendices Part III). These comments were considered in the development of the policies.
- 11.2 This chapter summarises the SA of the draft Core Strategy Submission document as dated 16 May 2011. Since this iteration of assessment, the Council have taken into consideration the SA recommendations. This had lead to some revision of the Core Strategy wording (dated 28.09.11). These revisions have been reviewed and their implications for the SA are reported in the Conclusions of this report.
- 11.3 The Babergh Core Strategy Submission Draft document (as of May 2011) set out 17 policies. For the purposes of the SA, 16 of these policies were grouped by theme, based on similar aims and objectives, into 9 components for assessment. Although the policies were assessed simultaneously, their key features have been recognised and recommendations have been made for individual policies where necessary. The components used for the assessment are shown in Table 11.1 and the Key Diagram is shown in Figure 11.1. Table 11.1 shows the policies' text and where necessary it also includes extracts from the policies' supporting text.
- 11.4 Policy CS11 (Town, Village and Local Centres) has been added to the Core Strategy document later in the process after the first iteration of the policies' appraisal. This policy does not introduce fundamentally novel elements to the Core Strategy. It fosters development in Sudbury, Hadleigh, the Ipswich urban fringe at Copdock, in village and local centres and in the New Directions of Growth through the protection of their vitality and viability and opportunities to enhance facilities at an appropriate scale. Development in these areas has been assessed through the relevant Policies CS1-CS6 and the SA findings for these policies are applicable for Policy CS11. Further, this policy itself includes a safeguard, requiring an assessment of new town centre uses on the character and function of the centre, anti-social behaviour and crime, the amenities of nearby residents, as well as on town centre vitality and viability. Therefore, it has been deemed that a separate assessment of the policy is not required.
- 11.5 Policy CS18: Monitoring was not assessed against the SA objectives, as its purpose (the monitoring of the Core Strategy implementation) does not influence development directly and differs in this way from the rest of the policies. Instead, the policy has been considered in the preparation of the monitoring framework. It has been recommended that the Council takes on board the recommendations for monitoring in the SA Report in finalising this policy.
- 11.6 The SA Framework, as developed by BDC, used to undertake the assessment is shown in Table 6.1. The results of the detailed appraisal of the potential effects predicted to arise as a result of the implementation of the Core Strategy Policies are included in Appendix B (Appendices Part III). The section below presents an analysis of the detailed appraisal in terms of the significance of direct effects and potential cumulative effects and recommendations for improving the sustainability of the policies. Suggestions for mitigation of adverse effects or enhancement of positive effects are also set out.



- 11.7 Table 11.2 presents a summary of the significance of direct effects from the detailed policies' assessment. The significance of effects is denoted using the following system of symbols:

+++	Strongly positive
++	Moderately positive
+	Slightly positive
0	No effect
-	Slightly negative
--	Moderately negative
---	Strongly negative
+/-	Combination of positive and negative effects / neutral effect

- 11.8 For the purposes of analysing the results of the assessment, significant effects are those which result in moderately or strongly positive or negative effects.
- 11.9 Although the policies were appraised individually or in groups as components, the combined effect of all of the policies together has been recognised in assigning a score for the predicted sustainability performance against each SA Objective. This approach is considered to be more holistic and it reflects the reality of the policies of the Plan being adopted and implemented together.
- 11.10 Further detail relating to the scoring methodology for assessment is included in Section 2.

Table 11.1 – Assessment Policy Components (as at May 2011)

Component/Policy	Policy Content
1. Spatial Strategy: Levels of Growth and its Distribution • Policy CS 1: Settlement Pattern Policy; • Policy CS2: Strategy for Growth and Development (<i>section relating to housing</i>)	<u>Policy CS1: Settlement Pattern Policy</u> ‘The development strategy for Babergh is planned to a time horizon of 2031. Most new development (including employment, housing, and retail) in Babergh will be directed to the towns/urban areas, and to Brantham and the Core Villages and Hinterland Villages identified below: <u>Towns / Urban areas</u> • Sudbury and Great Cornard • Hadleigh • Babergh Ipswich Fringe (edge of urban area) • Brantham Regeneration A Master Plan will be prepared in conjunction with the landowner for the regeneration of the former industrial site at Brantham to provide a framework for the area defined by Local Plan Policy EM06 and to ensure the integration of the redevelopment with the village. <u>Core Villages serving Functional Clusters</u> Core villages will act as a focus for development within their functional cluster and, where appropriate, site allocations to meet housing and employment needs will be made in the Site Allocations document. Rural exceptions sites will also be pursued for these villages according to identified local needs. The core villages identified on the Key Diagram are: • Bildeston • Boxford • Bures St Mary • Capel St Mary • East Bergholt • Glemsford • Holbrook

Component/Policy	Policy Content
	• Lavenha • Long Melford • Nayland <u>Hinterland Villages</u> Hinterland villages are identified on the key diagram and listed below: • Acton • Aldham • Assington • Belstead • Bentley • Brent Eleigh • Brettenham • Burstall • Chelmondiston • Chelsworth • Cockfield • Copdock and Washbrook • Edwardstone • Elmsett • Great Waldingfield • Harkstead • Hartest • Hintlesham • Hitcham • Holton St Mary

Component/Policy	Policy Content
	• Kersey • Lawshall • Layham • Leavenheath • Little Waldingfield • Monks Eleigh • Nedging and Naughton • Newton • Pinewood • Polstead • Preston St Mary • Raydon • Shimpling Street • Shotley • Sproughton • Stanstead • Stoke By Nayland • Stratford St Mary • Stutton • Tattingstone • Wattisham • Whatfield • Woolverstone <u>Countryside</u> In the countryside, outside the towns/urban areas, core and hinterland villages defined above, development will only be permitted in

Component/Policy	Policy Content				
	exceptional circumstances subject to a proven justifiable need The scale and location of development will depend upon the local housing need, the role of settlements as employment providers and retail/service centres, as well as having regard to environmental, physical and social infrastructure constraints, and the views of local communities as expressed in community/neighbourhood plans'. <u>Supporting text</u> The future directions of growth, the edge of town/urban extensions, have been selected as locations that can be aligned with the capacity of existing infrastructure, or can be planned at a scale that is sufficiently viable to include new or improved infrastructure, and planned to include employment land, green infrastructure, and access to services including transport. For Babergh district it would be difficult in practice to achieve a precise or very close geographical relationship between provision of new jobs and homes 'across the board', as may be easier within urban districts / areas. This is partly because of the need to sustain and revitalise the rural areas, as well as the urban areas, in a large mainly rural district (with a dispersed settlement and population pattern) of some 230 square miles. Given Babergh's inevitable strong connections with surrounding areas (bordering 6 other large district areas), achieving an objective of 'self-containment' for live-work patterns is considered unrealistic. At the same time, in terms of sustainable travel patterns and quality of life, 43% out-commuting (and a similar level of in-commuting) is disadvantageous. In terms of new planned strategic growth, both the already planned and proposed additional mixed and balanced communities for the urban edge extensions (for each urban area) have been conceived to provide for as close a geographical relationship between housing and jobs as possible <u>Policy CS2: Strategy for Growth and Development</u> <i>(section related to housing)</i> Employment and housing growth will be accommodated within Babergh's existing settlement pattern and in new mixed and balanced communities on the edges of the towns and the Babergh Ipswich Fringe. Particularly in the case of the latter (but also in other cases), a co-ordinated approach towards planning and development in nearby local authority areas will be adopted. In order to ensure this, close collaborative working will be maintained with all partners, including local authorities, the Haven Gateway Partnership and others. <u>Number and Distribution of New Homes</u> In addition to existing commitments and a "windfall" figure of 750 for the second half of the plan period (2021 – 2031) provision will be made for 2,500 new dwellings to be built in the following locations: <table border="1" data-bbox="689 1401 1529 1441"> <thead> <tr> <th data-bbox="689 1401 1240 1441">Location</th><th data-bbox="1240 1401 1529 1441">Number of Dwellings</th></tr> </thead> <tbody> <tr> <td> </td><td> </td></tr> </tbody> </table>	Location	Number of Dwellings		
Location	Number of Dwellings				

Component/Policy	Policy Content										
	<table border="1"> <tr> <td>Sudbury and Great Cornard</td><td>850</td></tr> <tr> <td>Hadleigh</td><td>250</td></tr> <tr> <td>Ipswich Fringe</td><td>350</td></tr> <tr> <td>Brantham Regeneration, *Core and Hinterland Villages</td><td>(check)1050</td></tr> <tr> <td>Total</td><td>2,500</td></tr> </table>	Sudbury and Great Cornard	850	Hadleigh	250	Ipswich Fringe	350	Brantham Regeneration, *Core and Hinterland Villages	(check)1050	Total	2,500
Sudbury and Great Cornard	850										
Hadleigh	250										
Ipswich Fringe	350										
Brantham Regeneration, *Core and Hinterland Villages	(check)1050										
Total	2,500										
2. Strategy for Sudbury/Great Cornard	<u>Policy CS3: Strategy for Sudbury/Great Cornard</u> An Area Action Plan DPD will, subject to resource availability, be prepared for Sudbury/Great Cornard to provide a framework for all new development in the town and to ensure that development of the larger greenfield sites is integrated into the town and delivered at the right time. In addition to expanding the capacity for development of the Chilton Mixed Use, Local Plan (2006) allocation to the north, provision will be made for land to be developed for employment uses and housing to the north east of the town. The Council will encourage and support the continued growth and diversification of Sudbury town centre to serve its catchment area, particularly the provision of larger, more versatile retail and service units and improvements to public transport, strategic and local access. Development in the directions of growth will be closely monitored and the following phasing and timing reviewed to ensure delivery of an appropriate amount of new housing and employment land through the plan period: i) 2011-2 onwards - implementation of the Chilton Mixed Use Development in accordance with Local Plan Policy CP01; ii) 2016 review of progress with delivery of CP01 and target date set for release of land for employment and housing in the direction of growth identified on the key diagram; iii) mid – late part of plan period – masterplan submitted and approved and first phase of land released for development for employment land and up to 500 dwellings. In addition to Policy XX? development in Sudbury/Great Cornard should, where appropriate, provide: • high quality design, structural landscape planting, and layouts and scale of development that respect adjacent landscape or townscape features, ensure a separate identity and avoid creeping coalescence with adjacent settlements; • a green infrastructure framework connecting with and adding or extending formal and informal green spaces, wildlife areas, and natural landscape settings and features; • good links and/or the enhancement of existing links for pedestrians and cyclists to the town centre, rail station, employment areas,										

Component/Policy	Policy Content
	schools, bus stops, etc.
3. Strategy for Hadleigh	<u>Policy CS4: Strategy for Hadleigh</u> Subsequent documents / plans / proposals will set boundaries and provide a framework for growth within the direction of growth shown on the key diagram. Development in Hadleigh will be closely monitored and reviewed to ensure delivery of an appropriate amount of new housing and employment land through the plan period. In addition to Policy XX? development in Hadleigh should, where appropriate, provide: • high quality design, structural landscape planting, and layouts and scale of development that respect adjacent landscape or townscape features, and maintain the separate identity of Hadleigh; • a green infrastructure framework connecting with and adding or extending formal and informal green spaces, wildlife areas, and natural landscape settings and features; and • good links and/or the enhancement of existing links for pedestrians and cyclists to town centre shops and services, employment areas, schools, bus stops, etc. Hadleigh will be promoted as a visitor attraction and a wide range of diverse uses and facilities will be encouraged. Small scale refurbishments and redevelopments aimed at enhancing retail quality and consumer choice will be supported in this centre.
4. Strategy for Growth in the Ipswich Fringe	<u>Policy CS5: Strategy for Growth in the Ipswich Fringe</u> Subsequent documents / plans / proposals will set boundaries and provide a framework for growth within the direction of growth shown for Babergh's Ipswich Fringe on the key diagram. In addition to Policy XX? development in Babergh's Ipswich Fringe should: • be based upon and designed around a green infrastructure framework providing high quality design, structural landscape planting, and connections to or potential links with existing formal and informal green spaces, wildlife areas, and natural landscape settings and features, particularly the Gipping Valley footpath, Chantry Park and Belstead Brook Park; and • provide good links and/or the enhancement of existing links for pedestrians and cyclists to local shops and services, employment areas, schools, and public transport routes and services.

Component/Policy	Policy Content
	▪ Note: Reference needs to be added to policy. Copdock interchange [refer to delivery policy] <u>Supporting text</u> The urban edge of Ipswich extends into and borders Babergh district, and the town provides jobs, services, leisure and cultural facilities for many Babergh residents. The creation of mixed and balanced sustainable communities means that a proportion of Babergh's growth should be accommodated in the Ipswich Fringe area to provide the opportunity for homes and jobs close to existing jobs and services and good public transport links.
5. Strategy for development in Core and Hinterland Villages	<u>Policy CS6: Strategy for development in Core and Hinterland Villages</u> Proposals for development in Core Villages will be approved on sites allocated in the Site Allocations DPD, and elsewhere where proposals score positively when assessed against Policy CS11 and the following matters are addressed to the satisfaction of the local planning authority where relevant and appropriate to the scale and location of the proposal: • site location and sequential approach to site selection; • Sustainability Appraisal; • Locally identified need - housing and employment, and specific local needs such as affordable housing; • Locally identified community needs; and • Cumulative impact of development in the area. Comprehensive redevelopment proposals for the site identified and allocated as the Brantham Industrial Area in the 2006 Babergh Local Plan will be approved where proposals comply with criteria in Local Plan Policy EM06 and policies in this Core Strategy, principally Policy CS11. Development in Hinterland Villages will be approved where proposals are able to demonstrate a close functional relationship to the existing settlement on sites where the relevant issues listed above are addressed to the satisfaction of the local planning authority and where the proposed development: • is well designed and appropriate in size/scale, layout and character to its setting and to the village, • is adjacent or well related to the existing pattern of development for that settlement, • meets a proven local need, such as affordable housing or targeted market housing identified in a community local plan/neighbourhood plan, • supports local services and/or creates or expands employment opportunities, and

Component/Policy	Policy Content
	• does not compromise the delivery of permitted or identified schemes in community/village local plans within the same functional cluster. The cumulative impact of development both within the hinterland village in which the development is proposed and within the functional cluster of villages in which it is located will be a material consideration when assessing such proposals. All proposals for development in Hinterland Villages must demonstrate how they meet the criteria list above. <u>Supporting text</u> It is intended to provide greater flexibility within rural communities, allowing growth and service/ infrastructure improvements, to develop in line with the day to day practice of people living in those communities. The approach advocated for the management of growth in the core villages and their catchment areas, has many benefits for the communities. The application of Policy CS 6 and other relevant policies in the Core Strategy will lead to the following benefits; * Greater flexibility in the provision of affordable housing * Greater flexibility in the allocation / take up affordable housing * Flexibility in the provision and location of facilities * Flexibility in the provision and location of leisure and recreation facilities * Flexibility in provision of employment
6. Sustainable Development and Climate Change	<u>Policy CS7: Sustainable Development</u> Proposals for development must respect the local context and character of the different parts of the district, and should demonstrate how the proposal addresses the key issues and contributes to meeting the objectives of the Babergh Core Strategy. All new development within the district, will be required to demonstrate the principles of sustainable development, and in particular, and where appropriate to the scale and nature of the proposal, should: • respect the landscape, landscape features, streetscape/townscape, important spaces and historic views; • make a positive contribution to the local character, shape and scale of the area; • protect or create jobs and/or strengthen or diversify the local economy; • ensure an appropriate level of services, facilities and infrastructure are available or provided to serve the proposed development; • retain, protect or enhance local services and facilities and rural communities; • protect and enhance biodiversity, prioritise the use of brownfield land for development, and use and greenfield land and scarce

Component/Policy	Policy Content
	resources efficiently; • address climate change through design, adaptation, mitigation and by incorporating or producing sources of renewable energy; • make provision for open space, amenity, leisure and play through providing, enhancing and contributing to the green infrastructure of the district • create green spaces and/or extend existing green infrastructure to access to shady outdoor space within new developments and increase the connectivity of habitats and the enhancement of biodiversity and mitigate some of the impacts of climate change e.g. enhancement of natural cooling and reduction in the heat island effect, provision of pollution sequestration for the absorption of greenhouse gases, and through the design and incorporation of flood water storage areas, sustainable drainage systems (SuDS); • minimise both the risk of flooding as well as the risk from flooding to people and property, and incorporate, where appropriate, flood mitigation and/or flood resilience measures; • minimise surface water run-off and incorporate sustainable drainage systems (SuDS) where appropriate; • minimise waste (including waste water) during construction, and promote and provide for the reduction, re-use and recycling of all types of waste from the completed development. • be designed to make the best use of the site in terms of solar energy, passive heating and cooling, natural light and natural ventilation; • use sustainable building methods that optimise energy and water efficiency, and use techniques, methods and materials resilient to climate change (e.g. resilience to high winds and driving rain); • be accessible to people of all abilities including those with mobility impairments; • seek to minimise the need to travel by car using the following hierarchy: walking, cycling, public transport, commercial vehicles and cars) thus improving air quality; and • where appropriate to the scale of the proposal, provide a transport assessment and Travel Plan showing how car based travel to and from the site can be minimised. Development Briefs/Masterplans will be required for the New Directions of Growth, sites defined in the Site Allocations DPD, and for sites which by virtue of size, location or proposed mix of uses are determined by the local planning authority to require a master planning approach. A landscape/townscape appraisal, multifunctional Green Infrastructure strategy, and Design Concept statement will be essential components for Development Briefs and Masterplans. Proposals for development must ensure adequate protection and enhancement is given to local distinctive features which characterise Babergh's landscape and heritage assets of the built and natural environment, but are outside boundaries of designated sites covered by

Component/Policy	Policy Content
	statutory legislation. In particular proposals should; • Protect and where possible enhance the landscape and heritage areas including habitats and features of landscape, historic, architectural, archaeological, biological, hydrological and geological interest. Adaptation or mitigation will be required if evidence indicates there will be damaging impacts if a proposal is otherwise acceptable and granted planning permission. • Mitigation, adaptation and enhancement will need to reflect the existing landscape character and / or historic pattern / characteristics and provide relevant features appropriate to the specific area / location including habitat type, respecting the bio-diversity, geodiversity or historic character of the location affected. <u>Policy CS8: Reducing carbon dioxide emissions</u> Larger scale residential developments, particularly those within the future directions for growth, will be expected to achieve the Building For Life Silver Standard. All new non-residential developments will be expected to achieve, as a minimum, the BREEAM “Very Good” standard or equivalent. The Council will seek opportunities to identify sites where these standards can be achieved or exceeded, and will identify such sites in the Site Specific Allocations DPD where it is viable to require this as part of the overall scheme,. <u>Policy CS9: Renewable Energy</u> Development within the New Directions of Growth, and other large-scale development proposals will be expected to use on-site renewable energy sources, decentralised renewable or low carbon energy sources with the aim of achieving 15% of the predicted carbon reductions of all types of development. In other cases the Council will support proposals for development that includes on-site low and zero carbon technologies including, where appropriate, proposals to retro-fit existing buildings as part of schemes to extend or convert those buildings. Opportunities for incorporating renewable energy provision into new development, and/or producing renewal energy may be identified in the Site Allocations DPD. In all cases, the Council will encourage and support community initiatives, including linking with/contributing to the provision of local off-site renewable energy sources and the use of energy service companies (ESCOs) or similar energy saving initiatives.

Component/Policy	Policy Content
	<u>Policy C10: Green Infrastructure</u> Existing green infrastructure will be protected and enhanced. In new developments green infrastructure will be a key consideration and on the larger sites it will be central to the character and layout of development. All new development will make provision for high quality, multi- functional green infrastructure. Particular consideration will be given to ensuring new provision establishes links with existing Green infrastructure, providing a well connected network of green infrastructure in urban and rural areas. Specific requirements, characteristics and standards of GI provision within strategic sites and larger site allocations will be identified in the Site allocations DPD and where appropriate through master planning mechanisms.
7. Economy	<u>Policy CS2: Strategy for Growth and Development</u> <i>(section related to economy)</i> Employment and housing growth will be accommodated within Babergh's existing settlement pattern and in new mixed and balanced communities on the edges of the towns and the Babergh Ipswich Fringe. Particularly in the case of the latter (but also in other cases), a co-ordinated approach towards planning and development in nearby local authority areas will be adopted. In order to ensure this, close collaborative working will be maintained with all partners, including local authorities, the Haven Gateway Partnership and others. <u>The Local Economy</u> In order to support and encourage economic growth and employment opportunities and to ensure that a continuous range and diversity of sites and premises are available across the district through the plan period existing employment sites will be protected and new sites allocated in DPDs. These will comprise: • sub-regionally and locally strategic sites at Sroughton, Brantham, Wherstead and Sprites Lane, Ipswich to accommodate the need for strategic and well-located sites for port-related and other businesses, and new business land and premises in Ipswich; • allocations within mixed-use planned developments at Chilton and land off Lady Lane, Hadleigh (Local Plan allocations); • employment land as part of mixed use development planned for the New Directions of Growth; and, • where appropriate, allocations will be made to protect existing and provide for new employment areas in towns, villages and the rural area. Sufficient land will be allocated, and existing sites and premises protected from other types of development to accommodate a range of

Component/Policy	Policy Content
	employment development to provide for 9,700 new jobs in Babergh by 2031. In addition, strategic sites and sites within the Ipswich Fringe will be allocated and protected to provide for jobs growth for Ipswich. Employment uses that will contribute to the local economy and increase the sustainability of Core Villages, Hinterland Villages and the rural economy will be promoted and supported, where appropriate in scale, character and nature to their locality. Proposals for uses in new and emerging employment sectors, particularly those that re-use existing land or premises, contribute to farm diversification, and/or design or produce low carbon goods or services will be encouraged subject to scale and impact on their location. A flexible approach will be taken to home working and other innovative approaches to sustainable economic activity that make a positive contribution to the local economy and are in scale and character with, and appropriate to, their location. Town centres and Core Villages are the main focus for retail, leisure and community uses in the district. A healthy mix of uses and range of shops and services will be promoted in the two principal town centres of Sudbury and Hadleigh to ensure that these centres are active, vibrant and well used. * Allocations will be made in the Site Specific DPD, as appropriate, for new retail floorspace in Sudbury and Hadleigh. <u>Policy C11: Local Economic Strategy</u> The Council's strategy is to encourage and promote proposals that strengthen the local economy and provide a diversity of employment opportunities. The following existing business sectors are identified as major employers in the district: • manufacturing • port related logistics/warehousing and distribution • ICT • Non-B Use Class businesses including tourism, leisure and hospitality, education, health and welfare Development in these sectors will be encouraged and where appropriate clusters and/or networks will be identified through allocations and policies in other DPDs. <u>Policy C12: The Rural Economy</u> Historic villages such as Lavenham and Long Melford and coastal villages such as Chelmondiston and Shotley play an important role in tourism and leisure within the district, and appropriate new development that supports this role will be encouraged.

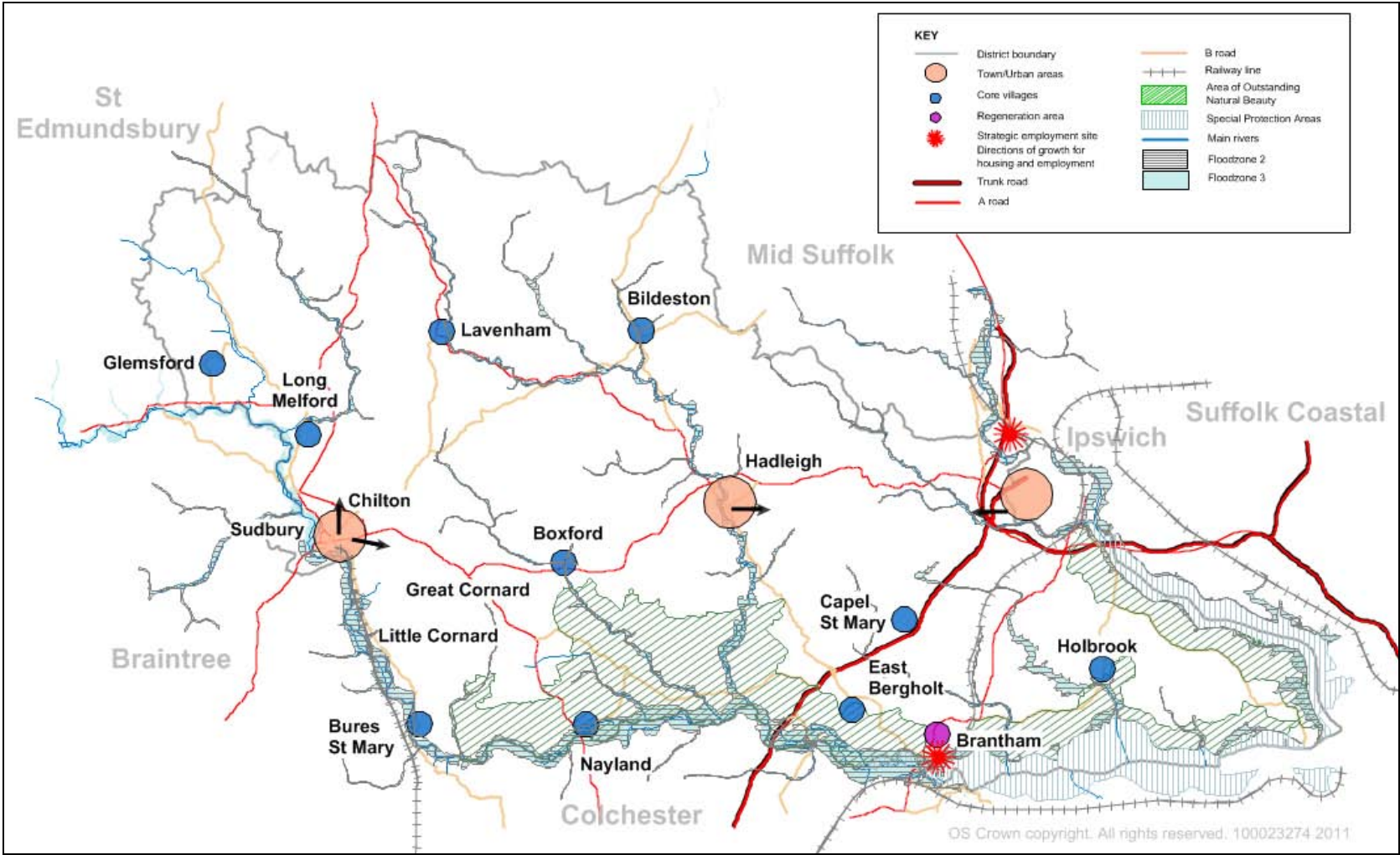
Component/Policy	Policy Content
	The economy in the rural area will be supported through the encouragement of proposals for farm diversification, the re-use of redundant rural buildings, tourism and leisure based businesses, the protection of small rural businesses and, where appropriate, farm shops and farmers markets. <u>Supporting text</u> Babergh is an economically diverse area, with industrial areas at the Ipswich fringe, Sudbury, Hadleigh and Brantham, traditional retail sectors in the two towns, a high proportion of small businesses, and tourism and leisure based around the historic villages of Long Melford, Lavenham, Kersey, and the Orwell and Stour estuaries and the scenic Constable Country. There is a significant agricultural base, and historically, Babergh has had a relatively high proportion of manufacturing employment. Our approach will be to create opportunities for jobs in these current and emerging sectors by protecting existing and allocating new sites in the district in locations that meet the needs of the local economy, by creating sustainable new mixed use developments, and through flexible policies that support non-B Use Class employment in the tourism/culture/ leisure/hospitality sectors and new ways of working, particularly home working. The Council will continue to work with our neighbouring authorities and sub-regional economic groups to consider the most appropriate distribution for new employment development taking into account the needs of businesses, land availability, environmental constraints, and a sustainable relationship with the parts of the Ipswich Fringe proposed for housing growth. Strategic employment sites within the sub-region that are located in Babergh district will be protected for employment development and allocated in the Site Allocations DPD. Our approach aims to reflect the economic geography of the district so that the strengths of each area are recognised and encouraged, existing sites protected and new sites allocated. The potential capacity of existing sites, sites within new mixed and balanced communities, and the potential for economic development in Core Villages have given us a “bottom-up” target of new jobs for the twenty year plan period.
8. Mixed and Special Needs Housing and Exception Sites	<u>Policy C13: Mix and Types of Dwellings</u> All new housing developments will be expected to contribute towards providing a mix of dwelling types and sizes to provide for the accommodation needs of the whole population of Babergh district, including those of vulnerable groups (such as the elderly and those with special needs), where such local needs exist, and at a scale appropriate to the size of the development. The mix, type and size of the housing development proposed on all sites will be expected to reflect established needs in the Babergh district.

Component/Policy	Policy Content
	Development on strategic housing sites or mixed use developments with a substantial residential element will be required to make provision for the accommodation needs of vulnerable or identified groups of people, as reflected in established local needs. New pitches will be provided at an appropriate level and in suitable locations to meet the identified needs of Gypsies and Travellers in the district. <u>Policy CS 14: Affordable Housing</u> In order to promote achievement of Babergh's medium-term target of 500 new affordable homes by 2015-6 (and thereafter its revised target) all residential development will be required to provide a minimum of 35% affordable housing. Individual targets may be set for New Directions of Growth and in Core Villages in Area Action Plan and Site Allocation DPDs. Where the proposed development is for a single dwelling, and where affordable housing cannot be provided on site, a commuted sum will be required. The tenure types, mixes and sizes of affordable housing will reflect established needs in the District. Where proven, issues of development viability and tenure mix will be considered to determine appropriate affordable housing requirements on site or appropriate levels of commuted sums. <u>Policy CS 15: Rural Exception Sites</u> The Council will take a flexible approach to the location of rural exception sites in the district, and will allow proposals adjacent, or well related to the settlement development boundaries of Core and Hinterland Villages where: - the proposed development by virtue of its size, scale and type will not exceed the identified local need (including need identified in other settlements within the same or adjacent /adjoining functional cluster); - the type of dwellings to be provided are consistent with the needs identified by the housing needs survey and agreed in advance by the District Council; and where - the proposed development is appropriate to the size/scale and character of the village, and is acceptable in terms of other detailed considerations such as site location and circumstances, design, layout, materials, landscaping, biodiversity, impacts on the countryside, amenity, and access, etc. <u>Supporting text</u> The Babergh District and beyond is made up of many communities. The aim is to retain those existing mixed and balanced communities and ensure that development sustains and enhances them.

Component/Policy	Policy Content
	It is important that opportunities are created to provide economic choices and to offer the option for to live close to where people work wherever possible or desirable. The range of homes available also needs to reflect the varying needs of the community, offer housing size and types which reflect needs at any given time. Affordability of homes is a key issue in Babergh which can be helped by the policy approach towards affordable housing and also guiding an appropriate mix and type of housing. Babergh is a rural district with few sites coming forward for larger developments particularly in rural areas. To balance the housing market in the district, all but very small, developments should provide a mix of house types and sizes in accordance with established needs. It is not considered practical to require a particular mix of dwellings on very small sites although these developments should contribute to the overall aims of mixed communities. Larger strategic developments will have an important role to play in addressing the particular needs of disadvantaged groups within the community, including the elderly population and vulnerable groups in the district. The strategy has to be backed up with legal powers to ensure that obligations are met. These are principally found within Section 106 of the Town and Country Planning Act, which facilitates a binding legal agreement on such matters between the Council as local planning authority and the land owner/ developer and successors in title. A new tool available for use in Infrastructure provision is the Community Infrastructure Levy (a "CIL"). This enables a local planning authority to make a levy on new buildings according to their size, location and end use, which can then be put towards infrastructure projects. It is expected that a CIL will be introduced in Babergh, which will be of significant benefit to the District, and the relevant procedures will be the subject of a Supplementary planning document.
9. Infrastructure Provision	<u>Policy CS16: Infrastructure Provision</u> The District Council will work with service providers, developers and other partners to develop sustainable places in the Babergh District with safe and healthy communities and secure the appropriate social, physical and green infrastructure needed to support these places and safeguard the environment. Developers must make full and proper proposals to meet these needs. The Council will protect, safeguard and enhance existing services, facilities and amenities that are important to the sustainability of local communities. New housing and commercial development will be required to be supported by and make adequate provision for appropriate infrastructure, services and facilities to ensure that the development is sustainable and of a high quality. Strategic as well as local infrastructure requirements will be planned for. Those infrastructure items currently foreseen are identified in Table ? Other items will come forward as the detailed planning of development progresses and must be provided for.

Component/Policy	Policy Content
	New development may need to be appropriately phased to ensure the proper provision of all infrastructure needed to support the development. Where appropriate the Council will seek on-site provision of infrastructure by the developer. Alternatively, financial contributions may be required to ensure timely off-site or on-site delivery of all types of infrastructure, according to agreed timetables which will be co-ordinated to relate to the advancement of the development. Arrangements for the ongoing maintenance of facilities will be required. The Council will secure the co-ordinated provision of Infrastructure elements with development timetables through planning conditions, and Section 106 Agreements attached to the planning permissions for developments, and/or through a Community Infrastructure Levy programme. A Supplementary Planning Document will be prepared setting out the mechanisms that will be used for taking development contributions, including the scope for pooling of contributions secured within the functional clusters, together with further details of the types and priorities of infrastructure provision. Planning applications which do not make proper provision to secure and maintain the necessary infrastructure will be refused. <u>Supporting text</u> The term “infrastructure” is used to refer to all of the facilities that are provided on a communal basis within a settlement, to enable it to function properly in the current day. Thus it will include: • utilities • transport – roads, rail, footpaths, cycleways • social • community , • educational – schools, nurseries • recreational – play areas • green areas

Figure 11.1 – Babergh Key Diagram



Results of the Assessment of the Policies

- 11.11 Appendix D (Appendices Part III) presents the results of the detailed appraisal of the potential effects of the draft Submission Core Strategy policies predicted to arise from their implementation. The section below presents an analysis of the detailed appraisal in terms of the significance of direct effects and recommendations for improving the sustainability of the policies. Suggestions for mitigation of adverse effects or enhancement of positive ones are also set out. Table 11.2 presents a summary of the significance of direct effects from the detailed appraisal.

Table 11.2 - Summary of Significance of Direct Effects of the Draft Submission Core Strategy Policies (May 2011)

SA Objective		1. Spatial Strategy	2. Sudbury Great Cornard	3. Hadleigh	4. Ipswich Fringe	5. Villages & Brantham	6. Sustainable Development	7. Economy	8. Housing	9. Infrastructure
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	++	++	++	++	++	++	0	++	0
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	+
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	++	++	++	0	++	++	++	++	++
22	To encourage efficient patterns of movement in support of economic growth	++	++	+	++	+	++	++	+	++
23	To encourage and accommodate both indigenous and inward investment	++	++	++	++	++	+	++	+	++

Assessment Summaries and Recommendations

Component 1: Spatial Strategy: Levels of Growth and its Distribution

- Policy CS 1: Settlement Pattern Policy;
- Policy CS2: Strategy for Growth and Development (section relating to housing).

11.12 These policies were appraised together given their similar aim, which is to set out the spatial location and distribution of residential development in the District to meet the identified housing needs over the next 20 years. The policies direct most of new development to the towns/urban areas and to Brantham and the Core and Hinterland Villages.

11.13 The key areas where development will be focussed are illustrated in the table below, which sets out the planned housing numbers and distribution.

Table 11.3 – Number and Distribution of New Homes in Draft Submission Core Strategy

Location	Number of Dwellings
Sudbury and Great Cornard	850
Hadleigh	250
Ipswich Fringe	350
Brantham Regeneration, Core and Hinterland Villages	(check)1050
Total	2,500

11.14 The policies contained within the Spatial Strategy Component have been predicted to have a number of significant positive effects against the SA social and economic objectives. Specifically such effects were predicted against the SA objectives 4 (social exclusion), 5 (access to key services for all), 6 (opportunity for employment), 7 (housing needs), 8 (community participation), 21 (town centres), 22 (efficient patterns of movement) and 23 (indigenous and inward investment). This is because the provision of housing together with associated infrastructure, retail and co-location of employment during the plan period will ensure that the District's housing needs are met and that economic prosperity is promoted. Policy CS1 directs most of new development to the towns/urban areas (Sudbury and Great Cornard, Hadleigh and the Ipswich Fringe) and to Brantham and the Core Villages and Hinterland Villages. These areas are the key settlements in the

district and increased development is likely to catalyse investment and will increase accessibility to a wide range of services, facilities and employment for a greater number of people across the district.

- 11.15 A significantly negative effect is predicted against SA objective 11 (soil resources and quantity) due to the inevitable release of greenfield land for development over the plan period, as the supply of brownfield land in the District is limited.

Recommendations

- 11.16 A number of recommendations for the improvement of the Component's performance against the SA objectives have been made during the assessment process. Given the high level and strategic nature of the Core Strategy overall and the policies within this component specifically, the majority of the recommendations provided apply to the lower tier documents in the LDF, which will be subsequently developed under the Core Strategy strategic policy umbrella:
- Objective 2 (education and skills) - It is recommended that the list of planning constraints in Policy CS1 includes a reference to specific accessibility criteria that could be provided in more detailed DPDs. This could include the requirement for development to be within walking/ cycling distance or easy reach by public transport to specified local services and facilities, including education facilities for both children and adults and employment opportunities (see an example provided in Box 1 below).
 - SA objective 8 (quality of life and community participation) - The planning considerations are to be provided as part of the Site Allocations DPD. It is recommended that this document specifically refers to the need for cultural and community facilities and spaces to encourage community participation.
 - SA objective 9 (water quality) - It is suggested that the water quality protection requirements are set out in the Development Management (DM) DPD. The planning considerations in the Site Allocations DPD should also include safeguarding against potential pollution to watercourses/estuaries and groundwater and promote opportunities for water quality improvements.
 - SA objective 10 (air quality) - It is suggested that planning considerations in a separate DPD (e.g. the DM DPD) include the consideration of effects of development on local air quality. Measures should be included to address potential adverse effects, such as the provision of sustainable transport infrastructure and planting/greening to provide increased pollution sequestration.
 - Objective 11 (soil resources and quantity) - 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 requirement for developers to assess the potential for development on brownfield land, ahead of greenfield development could be included. 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.

- Objective 13 (waste) - 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 and environmental management plans (CEMP).
- Objective 18 (heritage) - It is recommended that detailed planning guidance includes the protection of sites of archaeological interest.
- Objective 19 (landscape) - Specific design standards could be developed as part of the Site Allocations DPD to guide development in areas of high landscape value and minimise potentially negative effects.

Box 1 - Accessibility Planning Guidance, DfT 2006¹

- Percentage of a) pupils of compulsory school age and b) pupils of compulsory school age in receipt of free school meals, within 15/30 minutes of a primary school and 20/40 minutes of a secondary school by public transport;
- Percentage of 16-19 year olds between 30/60 minutes of a further education establishment by public transport;
- Percentage of a) people of working age (16 – 74) and b) people in receipt of Jobseekers' allowance within 20/40 minutes of work by public transport;
- Percentage of a) households and b) households without access to a car within 30/60 minutes of a hospital by public transport;
- Percentage of a) households and b) households without access to a car within 15/30 minutes of a GP by public transport;
- Percentage of a) households and b) households without access to a car within 15/30 minutes of a supermarket by public transport.

- 11.17 The strategy for Sudbury/Great Cornard stems from Policy CS 1: Settlement Pattern, which identifies this historic market town as one of the key urban areas where new development will be directed. This policy identifies two directions of growth to the north and north east of the town. This identification builds on the earlier Core Strategy work on the assessment of the broad locations (see section 9) by taking forward those locations which were deemed more sustainable. An Area Action Plan is planned to be prepared to guide development in this area.
- 11.18 The policies contained within this Component have been predicted to have a number of significant positive effects against the SA social and economic objectives. Specifically such effects are expected against the SA objectives 1 (public health), 5 (access to key services for all), 6 (opportunity for employment), 7 (housing needs), 20 (prosperity and economic growth), 21 (town centres), 22 (efficient patterns of movement) and 23 (indigenous and inward investment). This is because Policy CS3 seeks to provide housing, the scale of which is such that there will be a significant provision of mixed types of dwellings, notably a proportion of which will be affordable and for vulnerable groups; and it also seeks to increase the prosperity and economic growth of Sudbury through a balanced simultaneous increase in employment, a revitalised town centre with better retail, and associated infrastructure to support this. The policy provides for employment uses in the shorter term at Chilton and the longer term to the north-east of Sudbury. This may lead to an increase in overall employment, which is likely to deliver an increase in vocationally based training and skills and retention of local labour. The policy also seeks to provide a green infrastructure framework, for example by adding or extending green spaces, thereby providing recreational health benefits as well as a

number of other benefits associated with green infrastructure. The policy also seeks to provide improvements to public transport and good links and/or the enhancement of existing links for pedestrians and cyclists to the town centre, rail station, employment areas, schools, bus stops and other destinations. This should promote efficient movement patterns not only in Sudbury but also across its functional cluster.

- 11.19 Significant negative effects have been predicted against SA objective 11 (soil resources and quantity), as the component will lead to an increase in overall development within the new directions of growth. This will lead to greenfield land take and a loss of soil resources and agricultural land in the absence of sufficient brownfield land.

Recommendations

- 11.20 A number of recommendations have been proposed to minimise predicted negative effects and enhance predicted positive effects:
- Objective 1 (public health) - Given the scale of potential development associated with the policy, it is recommended that health facilities be provided in the new directions of growth, or existing facilities be extended and improved to support the potential growth in population.
 - Objective 2 (education and skills) - Given the scale of potential development associated with the policy, it is recommended that education facilities like schools be provided in the new directions of growth, or existing facilities be extended and improved to support the potential growth in population.
 - Objective 11 (soil resources and quantity) – The recommendation provided under Component 1 applies here as well.
 - Objective 12 (efficient use of water and mineral resources) - In terms of water resources conservation the Water Cycle Study (WCS) recommends such measures as leakage control, water efficiency, and metering.
 - Objectives 10 and 14 (air quality and effects of traffic) - There should be targeted traffic improvements in traffic and air quality hotspots, such as Cross Street.

Component 3: Strategy for Hadleigh

- Policy CS4: Strategy for Hadleigh
- 11.21 The strategy for Hadleigh stems from Policy CS 1: Settlement Pattern, which identifies this town as one of the key urban areas where new development will be directed. Hadleigh plays an important role as an employment and local service centre for the mid-Babergh area. The policy identifies one direction of growth to the east of the town. This identification builds on the earlier Core Strategy work on the assessment of the broad locations (see section 9) by taking forward the location which was deemed more sustainable.
- 11.22 Similarly to the policies in Component 2, the policies contained within this Component have been predicted to have a number of significant positive effects against the SA social and economic objectives. Specifically such effects are likely to arise against the SA objectives 5 (access to key services for all), 6 (opportunity for employment), 7 (housing needs), 20 (prosperity and economic growth), 21 (town centres), 22 (efficient patterns of movement) and 23 (indigenous and inward investment).

- 11.23 Those significant positive effects as well as a number of non-significant positive effects are expected, because the component provides for residential and employment development in the second largest settlement in Babergh. The scale of the housing proposed is such that a proportion of it is expected to be affordable. Simultaneous promotion of both housing and employment allocation will also improve access to local job opportunities for people in the Hadleigh's catchment area. The component seeks to provide good links and/or the enhancement of existing links for pedestrians and cyclists which may improve access for all, including those without access to a private car. The policy also seeks to strengthen the town centre as a visitor attraction and provide additional retail and other types of facilities, which will generate employment opportunities for local people.

Recommendations

- 11.24 The following recommendations have been proposed to minimise predicted negative effects and enhance predicted positive effects:
- Objective 1 (public health) - Given the scale of potential development associated with the policy, it is recommended that health facilities be provided in the new directions of growth, or existing facilities be extended and improved to support the potential growth in population.
 - Objective 2 (education and skills) - Given the scale of potential development associated with the policy, it is recommended that education facilities like schools be provided in the new direction of growth, or existing facilities be extended and improved to support the potential growth in population.
 - Objectives 11 (soil resources and quantity) – The recommendation provided under Component 1 applies here as well.
 - Objective 12 (efficient use of water and mineral resources) - Restrictions in wastewater treatment capacity would require consent increase and review as recommended in the Babergh Water Cycle Study. In terms of water resources conservation the Water Cycle Study recommends such measures as leakage control, water efficiency and metering.
 - Objective 18 (heritage) - It is recommended that the Site Allocations DPD includes safeguards for the protection of sites of archaeological interest, as the broad location assessment identified potential for some effects at the northern edge of the Hadleigh direction of growth.

Component 4: Strategy for Growth in the Ipswich Fringe

- Policy CS5: Strategy for Growth in the Ipswich Fringe
- 11.25 Ipswich is closely connected with Babergh district, providing jobs, services and various facilities for its residents. Therefore, accommodating a proportion of Babergh's growth within the Ipswich Fringe is important for the local prosperity. This policy identifies one direction of growth to the west of the town. This identification builds on the earlier Core Strategy work on the assessment of the broad locations (see section 9) by taking forward the location which was deemed more sustainable.
- 11.26 In terms of social and economic benefits, the Component performs similar to the other two components, directing new development towards the urban areas, due to such shared factors, as a simultaneous increase of employment and housing

development in the key urban area, emphasis on good design and links with green infrastructure, provision of good links and/or the enhancement of existing links for pedestrians and cyclists to local shops and services, employment areas, schools, and public transport routes and services. Therefore, significant positive effects have been predicted against SA objectives 5 (access to key services for all), 6 (opportunity for employment), 7 (housing needs), 20 (prosperity and economic growth), 22 (efficient patterns of movement) and 23 (indigenous and inward investment).

- 11.27 With regard to the component's performance against the SA environmental objectives, in addition to significant negative effects against SA objective 11 (soil), significant negative effects have been predicted against SA objective 17 (biodiversity). The Key Diagram shows that the overall direction of growth in the Ipswich fringe is towards the west, away from the Orwell Estuary. However, new development may still have direct or indirect effects (in particular disturbance from recreation) on such designations as the Stoke Tunnel SSSI, Stour and Orwell Estuaries SPA and Ramsar site. The HRA Screening assessed the effects of this policy on the European sites in more detail.

Recommendations

- 11.28 The following recommendations have been proposed to minimise predicted negative effects and enhance predicted positive effects:
- Objective 1 (public health) - Given the scale of potential development associated with the policy, it is recommended that health facilities be provided in the new directions of growth, or existing facilities be extended and improved to support the potential growth in population.
 - Objective 2 (education and skills) - Given the scale of potential development associated with the policy, it is recommended that education facilities like schools be provided in the new direction of growth, or existing facilities be extended and improved to support the potential growth in population.
 - Objectives 11 (soil resources and quantity) – The recommendation provided under Component 1 applies here as well.
 - Objective 17 (biodiversity) - The results of the preliminary and final HRA Screening must be incorporated in the Core Strategy development.

Component 5: Strategy for development in Core and Hinterland Villages

- Policy CS6: Strategy for development in Core and Hinterland Villages
- 11.29 This policy directs new development towards ten Core and 42 Hinterland villages that have an important function within the rural area, as they can provide for day to day essential needs of nearby communities. The Core Strategy does not identify the amount of new development or locations for growth in each of these settlements, which are scattered across the District. This will be subject to detailed analysis of local needs, opportunities, environmental factors, physical and social infrastructure constraints and will be set out in the Site Allocations DPD. A specific location is only known with regard to Brantham, a site where existing brownfield land is allocated for redevelopment on the basis of the saved policy EM06 in the Local Plan.
- 11.30 The Component has been predicted to have a number of significant positive effects against the following SA social and economic objectives: 5 (access to key services

for all), 6 (opportunity for employment), 7 (housing needs), 20 (prosperity and economic growth), 21 (town centres) and 23 (indigenous and inward investment). This is because the policy seeks to increase the prosperity and economic growth of Babergh through a balanced increase in housing and employment in the right rural locations. The intention is that these smaller settlements should play a complementary role to the towns of Sudbury, Hadleigh and Ipswich. This is likely to ensure the growth of sustainable communities in the Core and Hinterland Villages and their functional clusters. Whilst the component does not specifically identify where housing will be allocated other than at Brantham, the scale of housing overall is significant. The development will be encouraged where it supports the local need in affordable housing or targeted market housing. The component seeks to provide employment uses in functional clusters. The redevelopment of the site at Brantham, in particular, is likely to be a significant generator of employment. The policy also seeks to provide local services, where the need was identified. This will improve access to key services for those living in the more remote places in the District.

- 11.31 The Component scores lower in terms of its environmental effects compared to the other three area specific components. In addition to significant negative effects predicted against SA objective 11 (soil), significant negative effects have also been predicted against SA objectives 15 (GHG emissions), 17 (biodiversity) and 19 (landscape). This is because new development in these settlements will involve Greenfield land take and the overall increase of development across Babergh is likely to lead to the growth of GHG emissions associated with development itself and traffic. Even though the Core Strategy includes a number of measures to reduce GHG emissions, achieving a substantial modal shift to more sustainable transport modes and thus reducing transport related GHG emissions may be challenging and not realistic in the rural district, at least in the short to medium term. The negative effects on biodiversity have been predicted, because Brantham is adjacent to the Stour Estuary, part of the Stour and Orwell Estuaries SPA and Ramsar site. The Stour Estuary is the part of the SPA where human use and disturbance are lower and bird numbers recorded are higher than on the Orwell Estuary. Additionally, the Brantham site is located in an area of high landscape sensitivity and includes an AONB designation. Elsewhere, in the Core Villages and Hinterlands, development may also increase the pressure on landscapes and townscapes.

Recommendations

- 11.32 The following recommendations have been proposed to minimise predicted negative effects and enhance predicted positive effects:
- Objective 1 (health) - Given the scale of potential development associated with the policy, it is recommended that health facilities be provided in key sites such as Brantham to support the potential growth in population.
 - Objective 2 (education and skills) - Given the scale of potential development associated with the policy, it is recommended that education facilities like schools be provided in key sites such as Brantham, or existing facilities be extended and improved to support the potential growth in population.
 - Objectives 10 (air quality) - Development of sites with good accessibility to public transport routes should be prioritised.
 - Objective 17 (biodiversity) - The results of the preliminary and final HRA Screening must be incorporated in the Core Strategy development. The

policy promoting growth at Brantham must provide robust protection for the European site.

General Recommendations

11.33 Recommendations for the lower-tier documents have also been provided as part of the assessment of the policies CS3- CS6 to ensure that sustainability considerations are taken through to the next planning level:

- Objective 1 (public health) - Relevant lower tier documents such as Site Allocations or Development Management DPD and design proposals should properly address the issues of safety on Hadleigh High Street so walking and cycling can be encouraged.
- Objective 2 (education and skills) - It is recommended that the list of planning constraints includes reference to specific accessibility criteria that could be provided in more detailed DPDs. This could require development to be within walking/ cycling distance or easy reach by public transport of specified local services and facilities, including education facilities for both children and adults and employment opportunities.
- Objective 3 (crime) - Relevant lower-tier documents (e.g. the site allocations DPD, area action plans, masterplans) should include the requirement for new development to conform to the Secured by Design guidelines, thus reducing the opportunity for crime.
- Objective 4 (poverty and social exclusion) - It is recommended that the relevant lower tier documents, e.g. the Sudbury/Great Cornard AAP, provide further focus on pockets of deprivation and sets out measures to address social exclusion and deprivation issues.
- Objective 5 (access to key services) - Further detail should be provided on where improved access will be provided. This could be done in the Area Action Plan or the Site Allocations DPD. There should be a clear preference for sustainable modes of travel over the private car usage.
- Objectives 10 and 14 (air quality and effects of traffic) - Lower tier documents, e.g. the Area Action Plan DPD, should include specific details on how congestion in the town centres (e.g. in hotspots such as at the Copdock junction) will be tackled. This should be linked to measures in the Local Transport Plan.
- Objectives 16 (vulnerability to climatic events) - Development in the flood risk zone should be avoided or a flood risk assessment should be required for such development. Mitigation of flood risk should be based on the national policy in PPS25. Additionally a locally specific policy could be developed in the Development Management DPD.
- Objective 19 (landscape and townscape) - The Development Management DPD should include specific safeguards to protect the local landscape, in particular areas designated as Special Landscape Areas and other local landscape designations. This should then be taken on board in the development of the Site Allocations DPD.
 - The development within the identified directions of growth near Sudbury should avoid coalescence of urban extension with Great Waldingfield. The Site Allocations DPD should address this issue.
 - Consideration should be given in particular to avoiding, reducing and compensating for landscape effects at Brantham.

Component 6: Sustainable Development and Climate Change

- Policy CS7: Sustainable Development;
- Policy CS8: Reducing carbon dioxide emissions;
- Policy CS9: Renewable Energy;
- Policy C10: Green Infrastructure (GI).

11.34 Policy CS7: Sustainable Development is an overarching policy encompassing the many planning-based elements of delivering more sustainable forms of development. It provides the strategic guidance for the LDF as a whole as well as for individual development decisions. Policy CS8: Reducing carbon dioxide emissions promotes CO₂ emissions cuts and good practice in sustainable high quality design by requiring the adherence to the Building for Life Silver Standards for residential development and the BREEAM 'Very Good' standard for non-residential development. Policy CS9: Renewable Energy encourages the provision of zero/low carbon energy on-site or through community schemes, and where appropriate through larger scale generation of renewable energy. Policy CS10: GI promotes a network of multi-functional GI within and between urban and rural areas.

11.35 This component has been assessed as delivering significant positive effects against the highest number of the SA objectives as compared to the rest of the assessment components. This is not surprising, as the primary aim of Policy CS7 is to steer the implementation of the other, more specific, Core Strategy policies towards a more sustainable path and the other three policies in the component complement this aim. A range of significantly positive effects are predicted to arise from the Core Strategy in terms of the policies in this component. No significantly negative effects are predicted. Significant positive effects have been predicted against objectives to: improve the overall health of the population (SA objective 1); improve education and skills (SA objective 2); reduce crime and anti-social activity (SA objective 3); reduce poverty and social exclusion (SA objective 4); improve access to key services and facilities (SA objective 5); increase employment opportunities (SA objective 6); meet the housing requirements of the community (SA objective 7); encourage community participation (SA objective 8); improve water quality (SA objective 9); use water and mineral resources effectively (SA objective 12); reduce waste (SA objective 13); reduce vulnerability to climatic events (SA objective 16); conserve and enhance biodiversity and geodiversity (SA objective 17); revitalise town centres (SA objective 21) and encourage efficient patterns of movement to support economic growth (SA objective 22).

11.36 A large number of the benefits can be attributed to the policy requirements for adherence to the Building for Life and BREEAM design standards.

Recommendations

11.37 Recommendations to further enhance the performance of the policies against the SA objectives are made below.

- Objective 1 (public health) - More detailed policy considerations for Policy CS7 could include a specific list of the types of services and facilities that should be provided based on nationally accepted accessibility criteria (see Box 1 above).

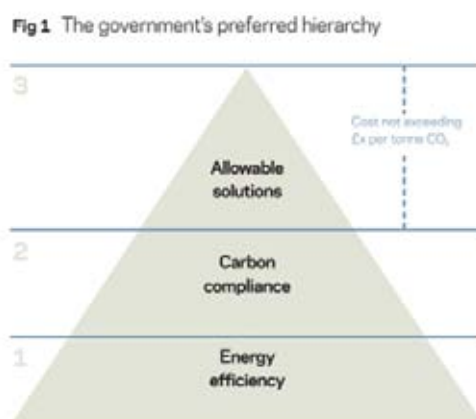
- Objective 3 (crime) - Secured by Design standards, or reducing the fear of crime through design could be included in the list of sustainable design principles at the more detailed policy stages.
- Objective 5 (access to key services) - It is recommended that the policy CS8 includes a definition of 'larger' developments to which the requirement of Building for Life Silver Standards will be applied.
 - Reducing food miles through the creation of local farmers markets as detailed in the supporting text, should be included in more detailed planning policy that may specify ways in which the council plans to reduce the need to travel through the LDF.
- Objective 7 (housing) - It is suggested that Policy CS8 title is changed to 'Sustainable design standards', as the requirements for both the Building for Life Standards and BREEAM cover a wide range of issues, not just CO₂ reductions.
- Objective 9 (water quality) - The recommendation provided under Component 1 applies here as well.
- Objective 10 (air quality) - It is recommended that the Core Strategy requirement for Travel Plans and transport assessments is strengthened and made more specific in the Development Management DPD, e.g. thresholds for development size for this requirement need to be specified to avoid ambiguity in the interpretation. The Development Management DPD could include a separate policy on Sustainable Transport.
- Objective 13 (waste) - It is recommended that Policy CS8 requires mandatory scoring for waste criteria within the requirements for BREEAM, which only becomes mandatory under BREEAM 'Excellent' rating.
- Objective 15 (GHG emissions) - It is recommended that bullet 13 of Policy CS7 is reworded to reflect the energy hierarchy (see Figure 11.2), without specifying particular methods, which could be included in the supporting text. Text could read: 'reflect the principles of the energy hierarchy, seeking to minimise the demand for energy through the design and layout of development, followed by energy efficiency, then the production of energy from zero or low carbon sources to meet residual demand.'
 - Policy CS9 could then be entitled 'meeting residual energy demand through low and zero carbon energy sources.'
 - It is recommended that policy CS8 be revised to refer to Part L1A of the [revised building regulations¹¹](http://www.planningportal.gov.uk/uploads/br/BR_PDF_AD11A_2010.pdf) in terms of the CO₂ emissions reduction requirements. It can also set out locally specific standards for the implementation of the Code for Sustainable Homes (CfSH). This should be in addition to requirements for Building for Life Standards and BREEAM "Very Good" standard, as these both standards are not prescriptive in terms of carbon dioxide reductions.
 - Further, it is recommended that where development is in greenfield locations, a higher standard of sustainable design is required (see also recommendation for Objective 11 for Component 1), which could

¹¹ Part L1A of the Building Regulations: Conservation of fuel and power in new dwellings, October 2010.
http://www.planningportal.gov.uk/uploads/br/BR_PDF_AD11A_2010.pdf

include the development of locally specific mandatory requirements within the CfSH criteria.

- The wording of Policy CS9 could be strengthened by defining large-scale developments and changing the wording from 'will be expected' to 'will be required' in relation to the use of zero/low carbon energy.
- Objective 16 (vulnerability to climatic events) - The message regarding flood mitigation in the policy CS7 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.
- Objective 17 (biodiversity) - It is recommended that the supporting text of Policy CS10 includes the following additional aims of GI: to contribute to habitat connectivity and habitats themselves, and to assist in adapting to climate change and to contribute towards mitigating climate change. 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.
- Objective 18 (heritage) - 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 (PPS5).

Figure 11.2 -- Energy Hierarchy¹²



Component 7: Economy

- Policy CS2: Strategy for Growth and Development (section related to economy);
- Policy CS11: Local Economic Strategy;
- Policy CS12: The Rural Economy.

11.38 The section of Policy CS2: Strategy for Growth and Development that relates to economy identifies the number of new jobs (9,700) to be provided in Babergh by 2031 and indicative locations of future employment sites. Policy CS11: Local Economic Strategy identifies business sectors which will be specifically

¹² Sustainability: Zero-carbon homes 17 April 2009 <http://www.building.co.uk/story.asp?storycode=3138410>

encouraged. Policy CS12: The Rural Economy focuses on appropriate growth opportunities for the rural economy.

- 11.39 The SA of the policies for the Submission Core Strategy has predicted a large number of significantly positive effects against the social and economic objectives. Significant positive effects are predicted in terms of reducing poverty and social deprivation (SA Objective 4), through improved access to employment and through the proximity of development to the Chilton direction of growth. Significant effects are likely to occur in terms of employment, prosperity and growth (SA Objectives 6 and 20), as the policies seek to provide strategic and local employment sites, as well as diversifying the local economy to build upon current and growing business sectors. The component is likely to help revitalise town centres (SA objective 21) through improving the range of employment opportunities. The component is likely to encourage efficient patterns of movement through encouraging a decrease in out commuting over time (SA objective 22). The component may significantly encourage and accommodate both indigenous and inward investment through improving the attractiveness of the district (SA objective 23).
- 11.40 In terms of the effects on environmental SA objectives, a number of significant negative effects are predicted. The policies are likely to lead to pressure on greenfield land, in the face of limited brownfield land availability, thus undermining the soil resources and quality objective (SA objective 11). The provision of employment sites and their realisation is likely to increase overall GHG emissions (SA objective 15) through the buildings themselves, as well as trip generation. The intensification of development in this area may lead to negative effects on the RIGS in Sudbury and ecology more widely (SA objective 17).

Recommendations

- 11.41 The following recommendations have been proposed to minimise predicted negative effects and enhance predicted positive effects:
- Objective 1 (health) - Policy CS2 could specify the types of access promotion, which should include local walking and cycling. More detailed policy in forthcoming DPDs should specify accessibility standards, so as to ensure that the majority of the population live within walking/cycling distance or good access by public transport of local key services, and specifically have good access to health care facilities.
 - Objective 9 (water quality) - The recommendation provided under Component 1 applies here as well.
 - Objective 10 (air quality) - Employment development with good links to residential development by sustainable modes or with potential for their development and improvement should be prioritised in the Site Allocations DPD.
 - Objectives 11 (soil resources and quantity) – The recommendation provided under Component 1 applies here as well.
 - Objective 17 (biodiversity and geodiversity) - It is understood that further detailed policy considerations will include detailed criteria-based policies for the management of the built and natural environment, and mitigation issues will be addressed through development management policies as required. This should include the consideration of RIGS.
 - Objective 19 (landscape) - National policies protect designated landscapes. However, it is recommended that an additional policy is developed to address the importance of local landscape character at the more detailed policy stage.

The Wherstead site in particular is subject to specific design standards in further detailed policy considerations, to minimise potentially negative effects on the AONB.

Component 8: Mixed and Special Needs Housing

- Policy CS13: Mix and Types of Dwellings;
 - Policy CS14: Affordable Housing;
 - Policy CS15: Rural Exception Sites.
- 11.42 As suggested by their titles, the policies within this assessment component focus on types and sizes of new dwellings, their mix, the need to provide specialist housing (e.g. vulnerable or other identified groups such as gypsies) and affordable housing and set out criteria for the identification of rural exception sites.
- 11.43 The approach to the provision of housing mixes and types in the Core Strategy may lead to a range of significant positive effects against social and economic SA objectives. No significantly negative effects are predicted.
- 11.44 There may be significant benefits on health (SA Objective 1), particularly through the provision of accommodation for elderly/special needs groups and pitches for gypsies, travellers and travelling showpeople. By responding to specific identified needs across a range of demographic groups, the component also significantly benefits objectives for poverty and social exclusion (SA Objective 4). Access will be significantly improved to key services for all sectors of the population (SA Objective 5). The component significantly helps meet the housing requirements of the whole community (SA Objective 7), including the affordable housing target for all developments to provide a minimum of 35% of such dwellings. Lastly, the increased diversity in the socio-economic mix and a range of skills that may arise from an increase in diversity within housing provision may help to revitalise town centres (SA Objective 21).

Recommendations

- 11.45 Although no significantly negative effects were predicted from the assessment of the policies in this component, a number of recommendations to improve their performance towards the achievements of the SA objectives are made below.
- Objective 3 (crime and anti-social activity) - Policy CS13 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 emphasise the need for integration of travelling and settled communities. Some of these details can be set out in lower tier documents, e.g. the Site Allocations DPD.
 - Objective 4 (poverty and social exclusion) - 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 CS13 supporting text.
 - Objective 5 (access to key services) - 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.
 - In policy C13, reference could be made to ensuring that Gypsy, Traveller and Travelling Showpeople's accommodation also has

good access to local services and facilities, so that they are not isolated communities

- Objective 16 (vulnerability to climatic events) - The Site Allocations DPD will identify the location of potential Gypsy, Traveller and 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 the site allocation process.

Component 9: Infrastructure Provision

- Policy CS16: Infrastructure Provision

- 11.46 Policy CS16: Infrastructure Provision aims to support the creation of sustainable communities in Babergh through an appropriate provision of social, physical and green infrastructure. The term 'infrastructure' is used to refer to all of the facilities that are provided on a communal basis within a settlement, to enable it to function properly in the current day, including:
- utilities;
 - transport – roads, rail, footpaths, cycleways;
 - social;
 - community;
 - educational – schools, nurseries;
 - recreational – play areas; and
 - green areas.
- 11.47 The policy within this Component is predicted to have mostly positive significant effects with one adverse significant effect.
- 11.48 The policy is likely to lead to significant health benefits (SA Objective 1), through the provision of health care facilities at Sudbury / Great Cornard and potentially elsewhere, and in combination with the opportunities provided by green infrastructure such as play areas and sports fields.
- 11.49 The policy seeks to improve accessibility through the provision of adequate social, green and physical infrastructure as well public transport infrastructure. This is likely to result in significant positive effects against objectives for accessibility (SA Objective 5), poverty and social exclusion (SA Objective 4), employment (SA Objective 6) and the quality of where people live (SA Objective 8). This is particularly important for the young and old, who may be restricted in accessing facilities outside their immediate community. The creation of a green infrastructure network could help the plan area to adapt to the effects of climate change as well as significantly enhancing local biodiversity (SA Objective 17).
- 11.50 The policy is likely to significantly support economic prosperity, indigenous and inward investment, town centre vitality and efficiency of movement by providing the infrastructure to support job and wealth creation (SA Objectives 20-23).
- 11.51 The one significant adverse effect arises from the absence in mention of water infrastructure. Delivery of new development without properly addressing such constraints can lead to over-abstraction of water and put strain on treatment infrastructure (SA objective 12).

Recommendations

- Objective 1 (health) - It should be ensured that the specific health needs of the ageing population are catered for in the provision of facilities. This may include specific accessibility arrangements. More specific references should be made to the number and location of health facilities.
 - More specific references should be made to sustainable transport improvements in the form of walking and cycling, detailing location of such facilities. The latter could be included in the Site Allocations DPD.
- Objective 2 (education and skills) - Further details should be provided on where and how many educational facilities are located. The policy should ensure the provision of educational facilities for adults.
- Objective 9 (water quality) - The findings of the WCS (e.g. infrastructure upgrades required in the growth locations) need to be considered and addressed before the site allocations process. Performance against this objective will also depend on the successful implementation of the policy CS7 (e.g. SUDS) and CS10 (green infrastructure).
- Objective 12 (water and mineral resources efficiency) - The findings and recommendations of the WCS (e.g. building a storage reservoir to make supply more reliable) need to be considered and addressed before the site allocations process is initiated.
- Objective 13 (waste) - Policy CS16 could include a requirement for the provision of sustainable waste management facilities such as community 'bring' sites.

Cumulative, Synergistic and Indirect Effects

11.52 The detailed assessment, the results of which are presented in Appendix B, was focused primarily on direct and indirect (secondary) effects, acting in isolation. As required by the SEA Regulations, cumulative, synergistic and indirect effects have also been recorded and analysed during the appraisal. Details of the methodology used can be found in Section 2.

11.53 Table 11.4 shows the results of this analysis.

Table 11.4 - Cumulative, Synergistic and Indirect Effects

Policy Component	Effects	Causes	Significance
All policies	Synergistic, Cumulative and Indirect effects on tackling poverty and social exclusion, reducing crime and fear of crime and improve health levels	A number of the policies may help to reduce poverty and social exclusion in the district, both cumulatively and indirectly. Secondary effects may include reduced rates of crime and a fear of crime. Factors potentially contributing to this include: - Improving the quality of housing and development as well as affordability; - Improving skills levels and access to community facilities, education and employment; - Improving access to health facilities may have more direct benefits on health levels, whereas policies that seek to improve accessibility by sustainable modes of transport and the overall provision of community facilities including open space may not only improve access, but indirectly improve physical and mental health levels through an increase in physical activity and a reduction in the fear of crime. Synergistically, an increase in the use of more sustainable modes of transport, including walking and cycling, added to the increased provision of open green space could have multiple environmental benefits. These could include improved air, noise and water quality amongst others, which will have benefits for human health both physically and mentally. Increased community interaction through the above measures of increasing walking as a mode of transport and the provision of areas of open space and community facilities within local areas is also likely to have beneficial effects on reducing social exclusion, which can also have increased positive effects on health levels.	Significant positive effects likely over the longer term as development proposals and infrastructure completed, providing this is done in an equitable way across the plan area and areas of deficiency are targeted.

Policy Component	Effects	Causes	Significance
All policies	Cumulative effects of strengthening the local economy	There are various policies for the stimulation of economic growth through revitalising town centres, focusing employment in existing centres and accessible locations, encouraging inward investment and supporting traditional and new rural businesses as well as emerging sectors such as zero and low carbon goods or services.	Significant positive effects likely over the longer term.
All policies	Combined effects of offering opportunities for employment and encouraging the retention of skilled labour for 'self sufficiency' and the development of sustainable communities.	Collectively, the policies within each of the themes identified may offer opportunities for providing employment, including the following: -The strengthening of existing business sectors; -The promotion of diversification through industries such as renewable energy generation, farm diversification, tourism; and - Focusing employment and retail development, as part of mixed use developments, in key centres and accessible locations. Indirect effects of the policies could lead to a reduction in out-commuting and an increase in the use of more sustainable transport modes due a reduction in the need to travel. This could have benefits for the local natural environment as well as local community benefits through an increased vested interest of the workforce and an increase in community mixing.	Significant positive effects in the medium to long term.
1, 2, 3, 4, 5, 6, 8	Cumulative effects on addressing local housing needs	The Core Strategy will seek to meet housing targets, as well as providing policy that will enable adaptation to the changing housing needs of the community over time. There are also policies in the plan seeking to deliver adaptability in housing design through adherence to the Building for Life Standards.	Significant positive effects likely in the short, medium and longer terms.
6, 8	Cumulative and synergistic effects of improving the quality of where people live.	The policy requirements will assist in improving the quality of living environments and community participation through stipulating adherence to Building for Life principles and BREEAM, ensuring housing quality and high standards of design in all development.	Significant and sustained positive effects in creating the culture for quality built and natural environments.
3, 6, 9	Cumulative and synergistic effects on	GHG emissions arise from a wide variety of sources including transport, construction, waste transfer and the	Positive effects overall if the Core Strategy

Policy Component	Effects	Causes	Significance
	contributing to climate change and vulnerability of climatic events and adapting to the effects of climate change.	general operation of buildings (heating and lighting systems). While the cumulative effects of realising the scale of development set out in these policies is likely to result in an overall increase in GHG emissions across the plan area, the policies should, in combination, afford a combating effect (i.e. through reducing average emissions per unit). As part of this, measures to reduce contributions to climate change will also enable adaptation to its effects. For example, sustainable building design requirements may include increased insulating properties, which can help both to improve energy efficiency as well as enable buildings to cope with increased temperature variations. The provision of SUDS and green infrastructure (GI) can help areas adapt to the effects of climate change through reducing the rate of surface water runoff and a reduction in the albedo effect and urban heat. Where significant areas of vegetation are created, this may increase carbon sequestration capacity. If both the insulation improvements and GI are combined, for example through green roofs, synergistic effects may also include, in addition to those above, increased adaptation benefits for biodiversity and flood risk amongst others.	policies in combination with the potential for green infrastructure are implemented effectively.
1, 2, 3, 4, 5, 7, 8, 9	Cumulative negative effects on soils, biodiversity, geodiversity and landscape	Potential loss of non-designated habitats and landscapes with consequences for the ability of the environment to maintain species diversity as a consequence of policies that will result in the development of large amounts of greenfield land (up to 65% of all new development). Indirect effects may arise through a potential increase in traffic levels, both from public and private transport as the rural areas experience new transport infrastructure (i.e. additional land-take and the encroachment of traffic into new areas). Effects may be more pronounced over the long term as a loss of connectivity between habitats results in a loss of the ability of species to adapt to the changes in climate.	Negative effects in the long term unless comprehensive policies are developed at the Development Management/Site Allocations stage.
1, 2, 3, 4, 5, 7, 8, 9	Synergistic negative effects on a loss of	Policies will result in a loss of soil resources through the development of large areas of greenfield land (up to	Negative effects overall in terms of protecting and

Policy Component	Effects	Causes	Significance
	vegetation and soils leading to a loss of carbon sinks and pollution sequestration.	65% of development could be directed to greenfield sites), which could reduce the capacity of the local carbon sink. Air quality may be affected as a result of a loss of vegetation providing pollution sequestration.	maintaining natural resources and an increase in GHG emissions.

- 11.54 The assessment serves to highlight the need for those elements that are expected to result in significant effects to be addressed more overtly as part of the DPD process, supported by mitigation as appropriate, as well as enhancement of beneficial effects where possible.

Council Response to SA Recommendations

- 11.55 The Council has given careful consideration to the SA recommendations in finalising the Core Strategy Submission Draft document. This is documented in Table 11.5.

Table 11.5 - SA Recommendations and Council Response- Submission Draft Core Strategy June 2011

Sustainability appraisal recommendation	Core Strategy Policy ref / component	CS / other Subsequent DPD	Response / justification
Objective 2 (education and skills) - It is recommended that the list of planning constraints in Policy CS1 includes a reference to specific accessibility criteria that could be provided in more detailed DPDs	Component 1 Policy CS 1&Policy CS2	Detail to be provided in subsequent DPDs	Considered this is adequately covered in CS policies 3-6
SA objective 8 (quality of life and community participation) - The planning considerations are to be provided as part of the Site Allocations DPD. It is recommended that this document specifically refers to the need for cultural and community facilities and spaces to encourage community participation.		Detail to be provided in subsequent DPDs	"Cultural" added to list in supporting text describing the term 'infrastructure'.
SA objective 9 (water quality) - It is suggested that the water quality protection requirements are set out in the Development Management (DM) DPD.		Subsequent DPD	Noted
SA objective 10 (air quality) - It is suggested that planning considerations in a separate DPD (e.g. the DM DPD)		Subsequent DPD	Noted
Objective 11 (soil resources and quantity) - It is recommended that the protection of soil quality is followed through and addressed in more detail in the DM DPD.		Subsequent DPD	Noted
Objective 13 (waste) - It is recommended that the future DM DPD includes a policy relating to sustainable waste management, specifically promoting adherence		Subsequent DPD	Noted

to the waste hierarchy.			
Objective 18 (heritage) - It is recommended that detailed planning guidance includes the protection of sites of archaeological interest.		Subsequent DPD	Noted
Objective 19 (landscape) - Specific design standards could be developed as part of the Site Allocations DPD to guide development in areas of high landscape value and minimise potentially negative effects.		Subsequent DPD	Noted
Objective 1 (public health) - Given the scale of potential development associated with the policy, it is recommended that health facilities be provided in the new directions of growth, or existing facilities be extended and improved to support the potential growth in population.	CS3 Strategy for Growth Sudbury / Great Cornard	Core Strategy	The infrastructure Table now complete in Appendix 3. This adequately covers this point
Objective 2 (education and skills) - Given the scale of potential development associated with the policy, it is recommended that education facilities like schools be provided in the new directions of growth, or existing facilities be extended and improved to support the potential growth in population.		Core Strategy	The infrastructure Table now complete in Appendix 3. This adequately covers this point
Objective 12 (efficient use of water and mineral resources) - In terms of water resources conservation the Water Cycle Study (WCS) recommends such measures as leakage control, water efficiency, and metering.		Subsequent DPD	Noted
Objectives 10 and 14 (air quality and effects of traffic) - There should be targeted traffic improvements in traffic and air quality hotspots, such as Cross Street.		Detail to be provided in subsequent DPDs	Monitored closely already by BDC the Air Quality Management Zone
Objective 1 (public health) - Given the scale of potential development associated with the policy, it is recommended that health facilities be provided in the new directions of growth, or existing facilities be extended and improved to support the potential growth in population.	Component 3 Policy CS4: Strategy for Hadleigh	Core Strategy	The infrastructure Table now complete in Appendix 3. This adequately covers this point
Objective 2 (education and skills) - Given the scale of potential development associated with the policy, it is recommended that education facilities like schools be provided in the new direction of growth, or existing facilities be extended and improved to support the potential growth in population.		Core Strategy	The infrastructure Table now complete in Appendix 3. This adequately covers this point
Objective 2(education and skills)		Core Strategy	The infrastructure Table now

Given the scale of potential development associated with the policy, it is recommended that education facilities like schools be provided in the new direction of growth, or existing facilities be extended and improved to support the potential growth in population.			complete in Appendix 3. This adequately covers this point
Objective 18 (heritage) - It is recommended that the Site Allocations DPD includes safeguards for the protection of sites of archaeological interest, as the broad location assessment identified potential for some effects at the northern edge of the Hadleigh direction of growth.		Subsequent DPD	Noted
Objective 1 (public health) - Given the scale of potential development associated with the policy, it is recommended that health facilities be provided in the new directions of growth, or existing facilities be extended and improved to support the potential growth in population.	Component 4 Policy CS5: Strategy for Growth in the Ipswich Fringe	Core Strategy	The infrastructure Table now complete in Appendix 3. This adequately covers this point
Objective 2 (education and skills) - Given the scale of potential development associated with the policy, it is recommended that education facilities like schools be provided in the new direction of growth, or existing facilities be extended and improved to support the potential growth in population.		Core Strategy	The infrastructure Table now complete in Appendix 3. This adequately covers this point
Objective 17 (biodiversity) - The results of the preliminary and final HRA Screening must be incorporated in the Core Strategy development.		Core Strategy	Agreed. Amendments incorporated. See table xx on HRA recommendations
Objective 1 (health) - Given the scale of potential development associated with the policy, it is recommended that health facilities be provided in key sites such as Branham to support the potential growth in population.	Component 5 Policy CS6: Strategy for development in Core and Hinterland Villages	Core Strategy	The infrastructure Table now complete in Appendix 3. This adequately covers this point
Objective 2 (education and skills) - Given the scale of potential development associated with the policy, it is recommended that education facilities like schools be provided in key sites such as Branham, or existing facilities be extended and improved to support the potential growth in population.		Core Strategy	The infrastructure Table now complete in Appendix 3. This adequately covers this point
Objectives 10 (air quality) - Development of sites with good accessibility to public transport routes should be prioritised		Core Strategy and subsequent DPD	Adequately covered by CS policies CS2, 3-6 and 10

Objective 17 (biodiversity) - The results of the preliminary and final HRA Screening must be incorporated in the Core Strategy development. The policy promoting growth at Brantham must provide robust protection for the European site.		Core Strategy	Agreed. Amendments incorporated. See table xx on HRA recommendations
	Component 6 Policy CS10: Sustainable Development; Policy CS7: Reducing carbon dioxide emissions; Policy CS8: Renewable Energy; Policy CS9 Green Infrastructure (GI).		
Objective 1 (public health) - More detailed policy considerations for Policy CS10 could include a specific list of the types of services and facilities that should be provided based on nationally accepted accessibility criteria		Core Strategy	The infrastructure Table now complete in Appendix 3. This adequately covers this point. More details are available in background evidence.
Objective 3 (crime) - Secured by Design standards, or reducing the fear of crime through design could be included in the list of sustainable design principles at the more detailed policy stages.		Subsequent DPD	Noted
Objective 5 (access to key services) - It is recommended that the policy CS7 includes a definition of 'larger' developments to which the requirement of Building for Life Silver Standards will be applied.		Subsequent DPD	No change necessary to Core Strategy – will be addressed through allocations in Site Allocations DPD
Objective 7 (housing) - It is suggested that Policy CS7 title is changed to 'Sustainable design standards', as the requirements for both the Building for Life Standards and BREEAM cover a wide range of issues, not just CO2 reductions.		Core Strategy	Agreed – policy CS7 title amended to “Helping to reduce carbon dioxide emissions – design standards” – will re-visit at end of consultation period.
Objective 10 (air quality) - It is recommended that the Core Strategy requirement for Travel Plans and transport assessments is strengthened and made more specific in the Development Management DPD, e.g. thresholds for development size for this requirement need to be specified to avoid ambiguity in the interpretation.		Subsequent DPD	It is considered that this is adequately covered in CS 10 and more specific guidance and requirements will be provided in subsequent DPDs.
Objective 13 (waste) - It is recommended that Policy CS7 requires mandatory scoring for		Subsequent DPD	Noted

waste criteria within the requirements for BREEAM, which only becomes mandatory under BREEAM 'Excellent' rating.			
Objective 15 (GHG emissions) - It is recommended that bullet 13 of Policy CS10 is reworded to reflect the energy hierarchy (see Figure 11.2), without specifying particular methods, which could be included in the supporting text. Text could read: 'reflect the principles of the energy hierarchy, seeking to minimise the demand for energy through the design and layout of development, followed by energy efficiency, then the production of energy from zero or low carbon sources to meet residual demand.' Policy CS8 could then be entitled 'meeting residual energy demand through low and zero carbon energy sources.' It is recommended that policy CS7 be revised to include locally specific standards for the implementation of the Code for Sustainable Homes (CfSH). This could be in addition to requirements for Building for Life Standards. Further, it is recommended that where development is in greenfield locations, a higher standard of sustainable design is required (see also recommendation for Objective 11 for Component 1), which could include the development of locally specific mandatory requirements within the CfSH criteria. The wording of Policy CS8 could be strengthened by defining large-scale developments and changing the wording from 'will be expected' to 'will be required' in relation to the use of zero/low carbon energy		Core Strategy	Not considered necessary. Format of CS10 intended to be non-technical and covers the points raised adequately. Energy hierarchy explained in Technical Background Document.
Objective 16 (vulnerability to climatic events) - The message regarding flood mitigation in the policy CS10 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.		Subsequent DPD	Noted
Objective 17 (biodiversity) - It is recommended that the supporting text of Policy CS9 includes the following additional aims of GI: to contribute to habitat connectivity and habitats themselves, and to assist in		Core Strategy	Agreed, amendment made – bullet points added in supporting text for CS9: Contribute to habitat connectivity and to habitat creation,

adapting to climate change and to contribute towards mitigating climate change. 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.		Subsequent DPD	protection and enhancement; Assist in adapting to climate change and contribute towards mitigating climate change; Noted
Objective 18 (heritage) - 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 (PPS5).		Subsequent DPD	Noted
Objective 1 (health) - Policy CS2 could specify the types of access promotion, which should include local walking and cycling. More detailed policy in forthcoming DPDs should specify accessibility standards, so as to ensure that the majority of the population live within walking/cycling distance or good access by public transport of local key services, and specifically have good access to health care facilities.	Component 7 Policy CS2: Strategy for Growth and Development (section related to economy); Policy CS12: Local Economic Strategy; Policy CS13: The Rural Economy.	Subsequent DPD	Adequately covered in CS policies 3-6 and 10
Objective 10 (air quality) - Employment development with good links to residential development by sustainable modes or with potential for their development and improvement should be prioritised in the Site Allocations DPD.		Subsequent DPD	Noted
Objective 17 (biodiversity and geodiversity) - It is understood that further detailed policy considerations will include detailed criteria-based policies for the management of the built and natural environment, and mitigation issues will be addressed through development management policies as required. This should include the consideration of RIGS.		Subsequent DPD	Noted
Objective 19 (landscape) - National policies protect designated landscapes. However, it is recommended that an additional policy is developed to address the importance of local landscape character at the more detailed policy stage.		Subsequent DPD	Noted
	Component 8 Policy CS14: Mix and Types of Dwellings; Policy CS15:		

	Affordable Housing; Policy CS16: Rural Exception Sites.		
Objective 3 (crime and anti-social activity) - 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 emphasise the need for integration of travelling and settled communities. Some of these details can be set out in lower tier documents, e.g. the Site Allocations DPD.		Core Strategy and Subsequent DPDs	Agree, amendment to Policy CS 14 provides further guidance. The following has been added to policy: The preferred approach to any provision necessary is to be through major developments or through small, rural exceptions sites, depending upon whether the identified need is urban or rural in nature. Proposals will be assessed against the policies of this Core Strategy (particularly Policy CS10) and relevant policies of subsequent DPD(s). Additional detail is to be provided in subsequent DPDs
Objective 4 poverty and social exclusion) - 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.		Subsequent DPD	Noted
Objective 5 (access to key services) - 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. In policy CS14, reference could be made to ensuring that Gypsy, Traveller and Travelling Showpeople's accommodation also has good access to local services and facilities, so that they are not isolated communities		Core Strategy Core Strategy and Subsequent DPDs	The infrastructure Table now complete in Appendix 3. This adequately covers this point Agree, amendment to Policy CS 14 provides further guidance. Additional detail is to be provided in subsequent DPDs
Objective 16 (vulnerability to climatic events) - The Site Allocations DPD will identify the location of potential Gypsy, Traveller and 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 the site allocation process.		Subsequent DPD	Noted
Objective 1 (health) - It should be ensured that the specific health needs of the ageing population	Component 9	Core Strategy and subsequent	Adequately covered in policies CS3-6 and DC17. The infrastructure Table now

are catered for in the provision of facilities. This may include specific accessibility arrangements. More specific references should be made to the number and location of health facilities. More specific references should be made to sustainable transport improvements in the form of walking and cycling, detailing location of such facilities. The latter could be included in the Site Allocations DPD.	Policy CS17: Infrastructure Provision	DPD	complete in Appendix 3. This adequately covers this point. Also more details provided in supporting evidence and subsequent DPDs
Objective 2 (education and skills) - Further details should be provided on where and how many educational facilities are located. The policy should ensure the provision of educational facilities for adults.		Core Strategy and subsequent DPD	Adequately covered in policies CS3-6 and DC17. The infrastructure Table now complete in Appendix 3. This adequately covers this point. Also more details provided in supporting evidence and subsequent DPDs
Objective 9 (water quality) - The findings of the WCS (e.g. infrastructure upgrades required in the growth locations) need to be considered and addressed before the site allocations process. Performance against this objective will also depend on the successful implementation of the policy CS10 (e.g. SUDS) and CS9 (green infrastructure).		Subsequent DPD	Noted
Objective 12 (water and mineral resources efficiency) - The findings and recommendations of the WCS (e.g. building a storage reservoir to make supply more reliable) need to be considered and addressed before the site allocations process is initiated.		Subsequent DPD	Noted.
Objective 13 (waste) - Policy CS17 could include a requirement for the provision of sustainable waste management facilities such as community 'bring' sites.		Core Strategy	Adequately covered. Appendix 3 infrastructure table. More detail can be considered at later stage, as appropriate site by site.
Recommendations for the lower-tier documents (refer to paragraph 11.32)	Policies CS3- CS6	Subsequent DPD	Noted and will be considered in more detail at the appropriate time

12. Mitigation

- 12.1 The term mitigation encompasses any approach that is aimed at preventing, reducing or offsetting significant adverse environmental effects that have been predicted. In practice, a range of measures applying one or more of these approaches is likely to be considered in mitigating any significant adverse effects predicted as a result of implementing the policies of the Core Strategy. In addition, it is also important to consider measures aimed at enhancing positive effects. All such measures are generally referred to as mitigation measures.
- 12.2 However, the emphasis should be in the first instance on proactive avoidance of adverse effects. Only once alternative options or approaches to avoiding an effect have been examined, should mitigation then examine ways of reducing the scale/importance of the effect.
- 12.3 Mitigation can take a wide range of forms, including:
- Suggested re-wording of some policies in order to improve the likelihood of positive effects and to minimise adverse effects;
 - Technical measures (such as setting guidelines) to be applied during the implementation stage;
 - Identifying issues to be addressed in project environmental impact assessments for certain projects or types of projects;
 - Proposals for changing other plans and programmes; and
 - Contingency arrangements for dealing with possible adverse effects.
- 12.4 Section 11 puts forward a range of recommendations for improvements to the policies of the Core Strategy in terms of taking a more proactive approach to achieving more sustainable development.
- 12.5 Mitigation measures for each Policy have been considered and the Policies Assessment Tables (Appendix D, Appendices Part III) include cross-references to mitigation measures where appropriate.

13. Monitoring

13.1 The SEA Directive states that:

'member states shall monitor the significant environmental effects of the implementation of plans and programmes...in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action' (Article 10.1). In addition, the Environmental Report should provide information on a 'description of the measures envisaged concerning monitoring' (Annex I (i)) (Stage E).

13.2 SA monitoring will cover predicted significant social and economic effects as well as significant environmental effects; and it involves measuring indicators that will enable the establishment of a causal link between the implementation of the plan and the likely significant sustainability effects (both beneficial or adverse) being monitored. This will allow the identification of any unforeseen adverse effects and enable appropriate remedial action to be taken.

13.3 The SA guidance recommends that SA monitoring be incorporated into each Council's existing monitoring arrangements. Under Section 35 of the Planning and Compulsory Purchase Act 2004 and Regulation 48 of the Town and Country Planning Regulations 2004 the councils are required to prepare Annual Monitoring Reports (AMRs) to assess the implementation of their LDFs. For monitoring efforts to be optimally effective, it will be important that the councils seek to integrate the monitoring of the significant sustainability effects of the Core Strategy with the AMR process.

13.4 Potential indicators for monitoring these effects have been identified as part of this appraisal and are listed under the relevant objective in the SA framework set out in Table 6.1.

13.5 In order to reach a final framework of indicators for their AMRs, recent research suggests that councils will need to consider the effects identified in the SAs to effectively monitor the sustainability effects of each LDF as a whole. This should be undertaken in dialogue with statutory consultees and other bodies, as in many cases the monitoring information may need to be provided by outside bodies.

13.6 Significant effects on the SA objectives (including direct as well as cumulative, synergistic and indirect effects) have been identified by the assessment and form the basis of the monitoring programme and are listed in Table 13.1.

Table 13.1 - SA Objectives with Identified Significant Effects

SA Objective against which a significant effect has been predicted	Nature of effect
1. To improve the health of the population overall	Positive
2. To maintain and improve levels of education and skills in the population overall	Positive
3. To reduce crime and anti-social activity	Positive
4. To reduce poverty and social exclusion	Positive
5. To improve access to key services for all sectors of the population	Positive
6. To offer everybody the opportunity for rewarding and satisfying employment	Positive
7. To meet the housing requirements of the whole community	Positive
8. To improve the quality of where people live and to encourage community participation	Positive

SA Objective against which a significant effect has been predicted	Nature of effect
9. To improve water and air quality	Positive
11. To conserve soil resources and quality	Negative
12. To use water and mineral resources efficiently, and re-use and recycle where possible	Positive and Negative
13. To reduce waste	Positive
15. To reduce emissions of greenhouse gases from energy consumption	Negative
16. To reduce vulnerability to climatic events	Positive
17. To conserve and enhance biodiversity and geodiversity	Positive and Negative
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Negative
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	Positive
21. To revitalise town centres	Positive
22. To encourage efficient patterns of movement in support of economic growth	Positive
23. To encourage and accommodate both indigenous and inward investment	Positive

- 13.7 The monitoring programme outlined in Table 13.2 is preliminary and will be confirmed at the time of the adoption of the Core Strategy DPD.
- 13.8 The programme may still evolve based on the results of public consultation, dialogue with environmental and other consultees and the identification of additional data sources, as in many cases information will be provided by outside bodies. It should be noted, however, that there will be a need for careful consideration of the practicalities of monitoring to be taken into account in shaping the final monitoring strategy, especially in the context of limited resources at the District level. The emphasis must be on creating a balanced, effective, yet achievable set of monitoring criteria.



Table 13.2 – Proposed Monitoring Programme

No	SA objective against which a significant effect was predicted	Indicator(s) to be used	Suggested frequency of review/analysis of monitoring data/mitigation	Responsibility for undertaking monitoring/ source
1	To improve the health of the population overall	Proportion of population with access to hospital or GP or dentist surgery	Annually	BDC
		Number of people killed and seriously injured in road traffic accidents per 100,000 population	Annually	Office for National Statistics
		Proportion of journeys to work on foot or by cycle	Annually	Office for National Statistics
		Travel to School data	Annually	BDC
		Obesity in the population	Annually	BDC
		Change in existing provision of outdoor playing space (youth and adult space)	Annually	BDC/Developers
		Change in existing provision of children's play space	Annually	BDC/Developers
		Change in provision of open space	Annually	BDC/Developers
		The % of total length of footpaths and other rights of way which are easy to use by members of the public	Annually	BDC
		Change in amount of accessible natural green space	Annually	BDC/Developers
2	To maintain and improve levels of education and skills in the population overall	Proportion of Year 11 pupils gaining 5+ A*-C grades at GCSE	Annually	Office for National Statistics
		Average point score per student at A and AS Level	Annually	Office for National Statistics
		Proportion of the population with no qualifications	Annually	Office for National Statistics
		Proportion of the population with NVQ level 4 or higher	Annually	Office for National Statistics
3	To reduce crime	Recorded Crime per 1000 population	Annually	Office for National Statistics



No	SA objective against which a significant effect was predicted	Indicator(s) to be used	Suggested frequency of review/analysis of monitoring data/mitigation	Responsibility for undertaking monitoring/ source
	and anti-social activity	Violent Crime Rate	Annually	Home Office
		Fear of Crime	Annually	Home Office
		Number of noise complaints	Annually	BDC
		Number of odour complaints	Annually	BDC
4	To reduce poverty and social exclusion	Proportion of the population who live in wards that rank within the most deprived 10% and 25% of wards in the country	Annually	Office for National Statistics
		Housing benefit recipients	Annually	BDC
5	To improve access to key services for all sectors of the population	Percentage of rural population living in parishes which have a food shop or general store, post office, pub, primary school and meeting place	Annually	BDC
		Proportion of population with access to key local services (eg GP, post office)	Annually	BDC
		New Retail Floor Space in Town Centres	Annually	BDC
		Proportion of population with access to a food shop – (those living within 30 minutes of key services by public transport)	Annually	BDC
		Number of child care places per thousand children under 5	Annually	BDC
6	To offer everybody the opportunity for rewarding and satisfying employment	Unemployment rate	Annually	Office for National Statistics
		Long term unemployment	Annually	Office for National Statistics
		Proportion of lone parents and long term-ill who are economically active	Annually	Office for National Statistics
		Average Earnings	Annually	Office for National Statistics
7	To meet the housing requirements of the	Homelessness	Annually	Office for National Statistics
		Housing Stock	Annually	BDC



No	SA objective against which a significant effect was predicted	Indicator(s) to be used	Suggested frequency of review/analysis of monitoring data/mitigation	Responsibility for undertaking monitoring/ source
	whole community	Housing Land Availability	Annually	BDC
		Affordable Housing	Annually	BDC
		Special Needs Housing	Annually	BDC
		Housing Types and Sizes	Periodically	BDC
		Dwellings per hectare of Net Developable Area	Annually	BDC
		Average property price to income ratio	Annually	BDC
		Number of unfit homes per 1,000 dwellings	Annually	BDC
8	To improve the quality of where people live and to encourage community participation	% of residents who are happy with their neighbourhood as a place to live	Periodically	BDC
		Area of land managed in whole or part for its ecological interest and with public access over and above public rights of way	Periodically	BDC
		Areas of deficiency in terms of natural green space	Annually	BDC
		Change in amount of accessible natural green space (Natural England standards)	Annually	BDC
		Number of people involved in volunteer activities	Periodically	BDC
		Number of visits to/uses of Council funded or part- funded museums per 1,000 population	Annually	BDC
9	To maintain and where possible improve water quality	Water quality in rivers	Periodically	Environment Agency
		Water quality in estuaries	Periodically	Environment Agency
		Bathing water quality	Periodically	Environment Agency
11	To conserve soil	Number and percentage of new dwellings completed on greenfield land	Annually	BDC/Developers



No	SA objective against which a significant effect was predicted	Indicator(s) to be used	Suggested frequency of review/analysis of monitoring data/mitigation	Responsibility for undertaking monitoring/ source
	resources and quality	Number and percentage of existing housing commitments on greenfield land	Annually	BDC/Developers
		Dwellings per hectare of net developable area	Annually	BDC/Developers
		Allocations on best and most versatile agricultural land (grades 1, 2, and 3)	Annually	BDC/Developers
		Number and area of potential and declared contaminated land returned to beneficial use	Annually	BDC/Developers
		Number / area of organic farms	Annually	BDC/Land and farms owners
12	To use water and mineral resources efficiently, and re-use and recycle where possible	Recycled aggregate production	Annually	BDC
		Water consumption	Annually	BDC
		Water availability for water dependant habitats	Periodically	BDC/Natural England
		Environment Agency Water Resource Availability Status	Annually	EA
		Wastewater Treatment and Collection capacity	Annually	Water Company
13	To reduce waste	Household (and municipal) waste produced	Annually	BDC
		Tonnage / proportion of household (and municipal) waste recycled, composted and landfilled	Annually	BDC
15	To reduce emissions of greenhouse gases from energy consumption	Consumption of electricity - Domestic use per consumer and total commercial /industrial use	Annually	BDC
		Consumption of gas - Domestic use per consumer and total commercial /industrial use	Annually	BDC
		Energy efficiency of homes	Annually	BDC/Developers
		Installed electricity generating capacity using renewable energy	Annually	Relevant utilities providers/ BDC



No	SA objective against which a significant effect was predicted	Indicator(s) to be used	Suggested frequency of review/analysis of monitoring data/mitigation	Responsibility for undertaking monitoring/ source
16	To reduce vulnerability to climatic events	Flood risk - planning applications approved against Environment Agency advice	Annually	Environment Agency / BDC
		Properties at risk of flooding	Annually	Environment Agency/ BDC
		Incidence of fluvial flooding (properties affected)	Annually	Environment Agency/ BDC
		Incidence of coastal flooding (properties affected)	Annually	Environment Agency/ BDC
		Developments refused because of risk of coastal erosion	Annually	Environment Agency/ BDC
		Incidence of flood watches and warnings	Annually	Environment Agency/ BDC
17	To conserve and enhance biodiversity and geodiversity	Change in number and area of designated ecological sites	Annually	BDC
		Reported condition of ecological SSSIs	Periodically	Natural England
		Development proposals affecting protected BAP habitats and species outside protected areas	Annually	BDC/Developers
		Achievement of Habitat and Species Action Plan targets	Periodically	BDC (Monitored through Local BAP using the Biodiversity Action Reporting System) / UK Biodiversity Partnership
		Level of recreational pressures on the Stour and Orwell Estuaries SPA/Ramsar Site	Annually	BDC in partnership with neighbouring authorities
		Bird survey results	Periodically	BDC/Developers/RSPB
		Number and area of geological SSSIs and RIGS	Periodically	Natural England/ Local Geoconservation Groups
		Reported condition of geological SSSIs and RIGS	Periodically	Natural England/ Local Geoconservation Groups



No	SA objective against which a significant effect was predicted	Indicator(s) to be used	Suggested frequency of review/analysis of monitoring data/mitigation	Responsibility for undertaking monitoring/ source
19	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Number and percentage of new dwellings completed on previously developed land	Annually	BDC/ Developers
		Number and percentage of existing housing commitments on previously developed land	Annually	BDC/ Developers
		Number of vacant dwellings	Annually	BDC
		Changes in the landscape (WI landscape survey)	Annually	BDC/ Developers/ Natural England
		Number / area of town / village greens and commons	Annually	BDC
		Area of designated landscapes - AONB, Environmentally Sensitive Areas	Annually	BDC/ Natural England
		Number of Environmentally Sensitive Area / Countryside Stewardship / Environmental Stewardship schemes	Annually	BDC/ Natural England
		Light pollution CPRE	Periodically	CPRE
		Number of planning applications refused for reasons due to poor design	Annually	BDC
20	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Take-up of employment floorspace	Annually	BDC
		Employment permissions and allocations	Annually	BDC
		Net percentage change in the total number of VAT registered businesses in the area	Annually	BDC
		Change in number of businesses paying business rates	Annually	BDC
		Business formation rate (Or new VAT registrations as a % of total VAT registered stock)	Annually	Office for National Statistics
		Number and percentage of employees by employment division	Annually	Office for National Statistics



No	SA objective against which a significant effect was predicted	Indicator(s) to be used	Suggested frequency of review/analysis of monitoring data/mitigation	Responsibility for undertaking monitoring/ source
		Business start ups and closures	Annually	Office for National Statistics
		Number and percentage of businesses by main industry type	Annually	Office for National Statistics
		Number an percentage of businesses by size (number of employees)	Annually	Office for National Statistics
		Number and percentage of businesses by industry type in key sectors (local authority to specify key sectors)	Annually	BDC/ Office for National Statistics
		Comparative industrial and office rental costs within the plan area		
		Employment permissions and allocations in rural areas	Annually	BDC
		Planning consents for B1, B2 and B8 in rural areas (part of employment land availability for regional level).	Annually	BDC
21	To revitalise town centres	Proportion of town centre units with A1 uses)	Annually	BDC
		Vacant units in town centres	Annually	BDC
22	To encourage efficient patterns of movement in support of economic growth	Distances travelled to work for the resident population	Annually	BDC/ Office for National Statistics
		Employment permissions and allocations in urban areas	Annually	BDC
		Number / percentage of people working from home	Annually	Office for National Statistics
		Number of developments where a travel plan is submitted or is a condition of development	Annually	BDC/ Developers
		Percentage of journeys to work undertaken by sustainable modes	Annually	Office for National Statistics
23	To encourage and accommodate both indigenous and inward investment	Number of enquiries to business advice services	Annually	BDC/ Local business advice services providers
		Number of enquiries to Suffolk Development Agency / LA / SCC	Annually	BDC/ Suffolk Development



No	SA objective against which a significant effect was predicted	Indicator(s) to be used	Suggested frequency of review/analysis of monitoring data/mitigation	Responsibility for undertaking monitoring/ source
				Agency / SCC
		Employment land availability	Annually	BDC
		Employment permissions and allocations	Annually	BDC

14. Conclusions

- 14.1 This SA Report documents the SA process and its key findings for the Core Strategy. The report builds upon SA work undertaken previously as part of the preparation of the LDF SA Scoping Report and appraisal of the strategic alternatives of the Issues and Options and Growth Scenarios and Broad Locations documents.
- 14.2 The latest assessment indicates that the Core Policies within the Babergh District Council Core Strategy Submission Draft generally meet the range of sustainability objectives identified in the SA Framework. The Core Policies are considered to offer potentially significant positive effects on all SA social and economic objectives and on some environmental ones. This specifically relates to the SA social objectives concerned with public health, accessibility for all to key services and facilities, opportunities for housing and employment, social inclusion and cohesion. Significant positive effects are also expected against economic SA objectives concerned with sustainable levels of prosperity, revitalisation of town centres, efficient patterns of movement in support of economic growth and investment.
- 14.3 Significant positive effects are also likely to arise in respect of the SA environmental objectives aiming, reduce waste and vulnerability to climatic events. A mix of significant positive and significant negative effects has been predicted against the environmental objectives on water and mineral resources efficiency and protection of biodiversity. Negative effects against these objectives are associated with constraints in terms of water supply and water treatment capacity as specified in the Water Cycle Study and with potential effects on ecological designations.
- 14.4 On the positive side, strong features of the Core Strategy from the sustainability perspective include the following:
- Policies included under assessment component 6 (Sustainable Development - Planning for Climate Change). A large number of the benefits can be attributed to the Policies 10, 7 and 8, which set out planning-based elements of delivering more sustainable forms of development, requirements for adherence to the Building for Life and BREEAM design standards and requirements for the provision of low and zero carbon energy. Specifically, compliance with the design standards requires the incorporation and demonstration of such sustainability measures as high energy performance, water conservation, use of recycled materials or materials with a low impact on the environment, promotion of carbon friendly transport modes and sustainable waste management and minimisation of ecological effects.
 - Policy CS9: Green Infrastructure promotes a network of multi-functional Green Infrastructure within and between urban and rural areas which creates potential for multiple benefits in such areas as public health, accessibility by sustainable modes, connectivity between biodiversity habitats and adaptation to changing climate.
 - Policy CS17 relating to Strategic Infrastructure aims to ensure that a sufficient level of services and facilities are provided for communities. In particular, it specifies improvements to health and educational facilities.
- 14.5 Significant negative effects have been identified against the environmental objectives 11 (soil resources), 15 (emissions of GHG) and 19 (landscape quality).



This is explained by the sheer amount of new development to be delivered during the Core Strategy period and its implications in terms of greenfield land take, pressures placed on the landscape, embodied carbon in new development and operational use of energy. In addition, the rural nature of the District makes it challenging to foster a shift towards more sustainable transport modes.

- 14.6 As a result of assessment recommendations, the Council have further refined the wording of the policy content in the Core Strategy Submission Draft, taking into account recommendations arising from both the SA and HRA processes as they developed.
- 14.7 Overall, as a result of the incorporation of the HRA and SA recommendations, the sustainability performance of the Core Strategy has been increased.
- 14.8 Where recommendations arising from the SA were not implemented by the Council, explanations as to why this is the case have been provided. These responses are acceptable from an SA perspective. In relation to other, more specific, recommendations it has been confirmed that the Council will consider them during the preparation of lower tier specific policy documents, e.g. Site Allocations and Development Managements DPDs. Only one SA recommendation in relation to Policy CS7 'Helping to reduce carbon dioxide emissions – design standards' is considered outstanding. Specifically, it is recommended that Policy CS7 should include a reference to Part L1A of the revised building regulations, so its requirements in terms of carbon dioxide emissions reductions are clear. The standards currently referenced in the policy do not include mandatory requirements for carbon dioxide emissions reductions.
- 14.9 Apart from the recommendation outlined above, it is considered that there are no other outstanding SA recommendations to the Babergh Core Strategy Submission Draft document.
- 14.10 Finally, the HRA Screening Report (September 2011) concluded that the Babergh Core Strategy Submission Draft is not predicted to have likely significant effects on any European site, either alone or in combination with other plans and projects, subject to Natural England's review.

15. References

- European Commission (2001) Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment".
- ODPM (September 2005). A Practical Guide to the Strategic Environmental Assessment Directive
- ODPM (November 2005) Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents
- Environmental Assessments of Plans and Programmes Regulations (Statutory Instrument 2004 no. 1633)
- The Planning and Compulsory Purchase Act 2004
- The Town and Country Planning (Local Development)(England) (Amendment) Regulations 2008
- Commission for Architecture and the Built Environment (CABE) and the Home Builders Federation, *Building for Life: the 20 Criteria*, <http://www.buildingforlife.org/criteria/> and *Delivering great places to live: 20 questions you need to answer* (2008 Edition), <http://www.buildingforlife.org/files/publications/bfl-criteria-guide.pdf>
- CLG December 2007, *Planning Policy Statement: Planning and Climate Change - Supplement to Planning Policy Statement 1*, <http://www.communities.gov.uk/publications/planningandbuilding/ppsclimatechange>
- CLG March 2010, *Consultation on a Planning Policy Statement: Planning for a Low Carbon Future in a Changing Climate*, <http://www.communities.gov.uk/publications/planningandbuilding/ppsclimateconsultation>
- CLG March 2010, *Consultation paper on a new Planning Policy Statement: Planning for a Natural and Healthy Environment*, <http://www.communities.gov.uk/publications/planningandbuilding/naturalenvironmentconsultation>
- Royal Haskoning June 2011, *Babergh Water Cycle Study*



This page has been left intentionally blank.

Atkins is an international Design, Engineering & Management Consultancy. Our clients choose Atkins to plan, design and enable their major projects across a wide range of disciplines both in the UK and overseas.

We are the largest engineering consultancy in the UK and the largest multi-disciplinary consultancy in Europe. Our unrivalled reputation rests on the skills of the 15,000 specialists within the organisation.

Our clients are varied and include governments, local and regional authorities, funding agencies and commercial and industrial enterprises. We help our clients to realise their objectives by developing and delivering practical solutions, adding value to their businesses through the application of our experience, innovative thinking and state-of-the-art technology.

Atkins Limited

Woodcote Grove, Ashley Road,
Epsom, Surrey KT18 5BW, England

Contact: Cristina West

Telephone number: +44 (0) 1372 756931

Fax number: +44 (0) 1372 746608

Email: cristina.west@atkinsglobal.com

Web address: www.atkinsglobal.com/environment