

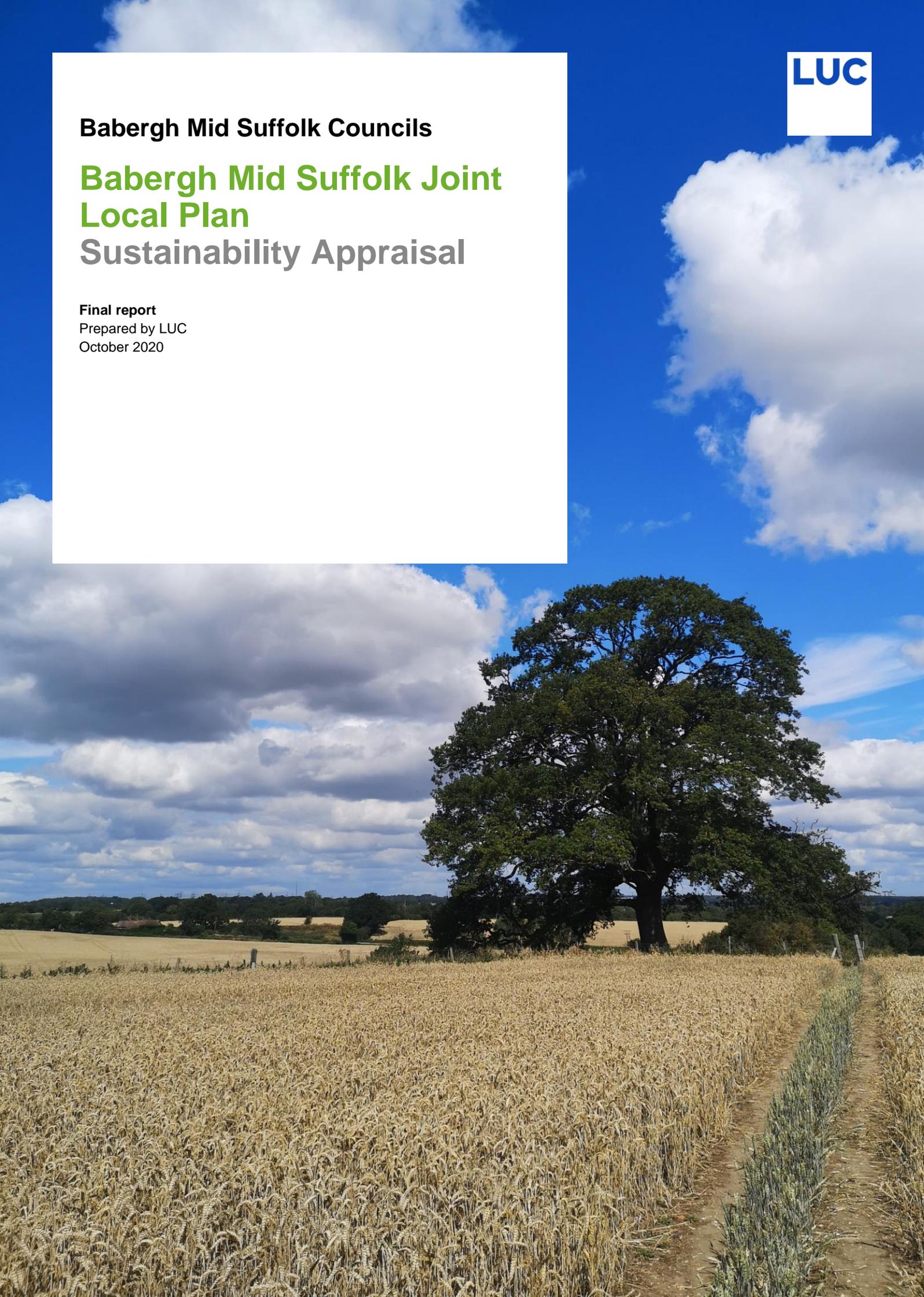
**Babergh Mid Suffolk Councils**

**Babergh Mid Suffolk Joint  
Local Plan  
Sustainability Appraisal**

**Final report**

Prepared by LUC

October 2020



## Babergh Mid Suffolk Councils

### Babergh Mid Suffolk Joint Local Plan Sustainability Appraisal

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# Chapter 1

## Introduction

**Sustainability Appraisal shows how well a plan performs against environmental, social and economic objectives. This chapter provides an introduction to the Sustainability Appraisal process.**

**1.1** LUC was appointed in November 2019 to carry out the Sustainability Appraisal (SA) of the Babergh Mid Suffolk Joint Local Plan (JLP). A considerable amount of SA work on the JLP had already been undertaken (see **Chapter 4 (Summary of Previous Sustainability Appraisal Work Undertaken)**) and LUC was tasked with building on and developing this work for the remaining stages of the JLP preparation process.

**1.2** SA is an assessment process designed to consider and report upon the significant sustainability issues and effects of emerging plans and policies, including their reasonable alternatives. SA iteratively informs the plan-making process by helping to refine the contents of such documents, so that they maximise the benefits of sustainable development and avoid, or at least minimise, the potential for adverse effects.

### Context for the Joint Local Plan

**1.3** Babergh District Council and Mid Suffolk District Council (BMSDC) are predominantly rural districts covering the centre of Suffolk, running from the boundary with Essex in the south to the boundary with Norfolk in the north. The Districts cover a combined area of over 1,400 square kilometres (540 square miles), with 190 parish and town councils, and thriving market towns.

**1.4** The two District Council areas have a lot in common, such as the proportion of residents living in urban and rural areas and their comparable levels of deprivation, and subsequently face similar challenges and opportunities. These challenges and opportunities have drawn both authorities together administratively. Since 2011, both authorities have worked together to deliver Council services in response to the challenges facing local government.

1.5 BMSDC have committed to preparing a Joint Local Plan.

## The Joint Local Plan

1.6 BMSDC are currently preparing a Joint Local Plan (JLP) to set out the strategy for development up to 2037. The JLP aims to manage the delivery of sustainable development through housing delivery and economic growth, whilst creating healthy communities and protecting the natural and historic environment.

### Extant plans for Babergh District

1.7 The current Development Plan for Babergh consists of:

- Saved Policies of the Babergh Local Plan, Alteration No. 2 (2006)
- Local Plan 2011-2031, Core Strategy and Policies (2014)
- Adopted neighbourhood plans.

### Extant plans for Mid Suffolk District

1.8 For Mid Suffolk, the current Development Plan consists of:

- Saved Policies of the Mid Suffolk Local Plan (1998)
- First Alteration to the Mid Suffolk Local Plan (2006)
- Core Strategy (2008) and Core Strategy Focused Review (2012)
- Stowmarket Area Action Plan (2013)
- Adopted neighbourhood plans.

1.9 The JLP will replace the Local Plans, Saved Policies, Core Strategies and the Stowmarket Area Action Plan, and cover the period 2018-2037.

1.10 The JLP is set out in three parts:

1. **Objectives and Strategic Policies:** Establishes the overall strategy for the pattern, scale and quality of development.
2. **Non-strategic Delivery Policies:** Detailed policies for the management and delivery of types of development.
3. **Non-strategic Place and Allocation Policies:** Detailed policies for specific places and neighbourhoods, including new housing and land allocations.

1.11 The location and extent of the Plan area, which incorporates both Council areas is shown in **Figure 1.1**.

## Sustainability Appraisal and Strategic Environmental Assessment

1.12 Under the amended Planning and Compulsory Purchase Act 2004<sup>1</sup>, SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive (European Directive 2001/42/EC) as transposed into law in England by the SEA Regulations<sup>2</sup>, which remain in force despite the UK exiting the European Union in January 2020. Therefore, it is a legal requirement for the JLP to be subject to SA and SEA throughout its preparation.

1.13 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the national Planning Practice Guidance<sup>3</sup>), whereby users can comply with the requirements of the SEA Regulations through a single integrated SA process – this is the process that is being undertaken in Babergh and Mid Suffolk District Councils. From here on, the term ‘SA’ should therefore be taken to mean ‘SA incorporating the requirements of the SEA Regulations’.

1.14 The SA process comprises a number of stages.

**Stage A:** Setting the context and objectives, establishing the baseline and deciding on the scope.

**Stage B:** Developing and refining options and assessing effects.

**Stage C:** Preparing the Sustainability Appraisal Report.

**Stage D:** Consulting on the Local Plan and the SA Report.

**Stage E:** Monitoring the significant effects of implementing the Local Plan.

## Habitats Regulations Assessment

1.15 The requirement to undertake Habitats Regulations Assessment (HRA) of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in July 2007 and updated in 2010 and

<sup>1</sup> The Planning and Compulsory Purchase Act 2004 was amended under the Environmental Assessments and Miscellaneous Planning (EU Exit) Regulations 2018.

<sup>2</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), as amended by The Environmental Assessments and

Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232).

<sup>3</sup> Ministry of Housing, Communities and Local Government (last updated 1 October 2019) Planning Practice Guidance: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

again in 2012 and 2017<sup>4</sup>. The Regulations translate Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) and 79/409/EEC (Birds Directive) into UK law, and remain a legal requirement despite the UK exiting the European Union.

**1.16** The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site.

**1.17** The HRA has been undertaken separately but the findings are reported in this SA Report.

## Meeting the requirements of the SEA Regulations

**1.18 Table 1.1** below signposts the relevant sections of the SA Report that are considered to meet the SEA Regulations requirements.

**1.19** SEA Guidance recognises that data gaps will exist but suggests that where baseline information is unavailable or unsatisfactory, authorities should consider how it will affect their assessments and determine how to improve it for use in the assessment of future plans. Where data gaps exist, these are highlighted in the 'Difficulties encountered' section in **Chapter 2 (Methodology)**. The collection and analysis of baseline data is regarded as a continual and evolving process, given that information can change or be updated on a regular basis. Relevant baseline information will be updated during the SA process as and when data are published.

## Structure of the SA Report

**1.20** This chapter has introduced the SA process for the Babergh Mid Suffolk JLP. The remainder of the report is structured into the following sections:

- **Chapter 2: Methodology** describes the approach taken to the SA of the JLP.
  - **Chapter 3: Sustainability Context for Development in Babergh and Mid Suffolk** describes the relationship between the Babergh Mid Suffolk JLP and other relevant plans, policies and programmes, in addition to the social, economic and environmental characteristics of both Districts through the identification of key sustainability issues.
  - **Chapter 4: Summary of Previous SA Work Undertaken** outlines the SA work that was undertaken at earlier stages in the JLP preparation process.
  - **Chapter 5: Sustainability Appraisal Findings for the Spatial Strategy Options** summarises the SA findings for the Spatial Strategy Options and how well they perform against one another in relation to the SA Objectives.
  - **Chapter 6: Sustainability Appraisal Findings for the Site Options** summarises the SA findings for the reasonable alternative residential and employment site options that have been considered for allocation in the JLP.
  - **Chapter 7: Sustainability Appraisal Findings for the JLP** summarises the SA findings for the policies and site allocations in the JLP, also considering the cumulative effects of the JLP as a whole, and with other plans and programmes.
  - **Chapter 8: Monitoring** describes the approach that should be taken to monitoring the likely significant effects of the JLP and proposes monitoring indicators.
  - **Chapter 9: Conclusions and Next Steps** summarises the key findings from the SA of the JLP and describes the next steps to be undertaken.
- 1.21** The main body of the report is supported by a number of appendices as follows:
- **Appendix A** presents the consultation comments received in relation to the April 2019 SA Scoping Report and the June 2019 Preferred Options SA Report produced by Place Services, in addition to the March 2020 SA Scoping Report produced by LUC.
  - **Appendix B** presents the updated review of relevant plans, policies and programmes, in addition to the updated baseline information for both Districts.
  - **Appendix C** presents the assumptions that were applied during the SA of residential and employment site options.
  - **Appendix D** presents the approach to the SA of Spatial Strategy Options and their detailed appraisal.
  - **Appendix E** presents the detailed SA matrices for the residential and employment site options by parish.
  - **Appendix F** presents the detailed SA matrices for the site allocation policies.
  - **Appendix G** lists the residential and employment site options that were considered for allocation in the JLP and explains why each one is included in the JLP or not.

<sup>4</sup> The Conservation of Habitats and Species Regulations 2017 (SI 2017/1012), as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579).

**Table 1.1: Meeting the requirements of the SEA Regulations**

SEA Regulations' Requirements	Where covered in this SA Report	
Environmental Report		
<p>Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation. The report shall identify, describe and evaluate the likely significant effects on the environment of:</p> <ul style="list-style-type: none"> <li>■ implementing the plan or programme; and</li> <li>■ reasonable alternatives taking into account the objectives and geographical scope of the plan or programme.</li> </ul> <p>(Regulation 12(1) and (2) and Schedule 2).</p>	<p>This full SA Report produced to accompany BMSDC's Joint Local Plan constitutes the 'environmental report'.</p>	
An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.		<b>Chapter 3 and Appendix B.</b>
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.		
The environmental characteristics of areas likely to be significantly affected.		
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 on the conservation of wild birds and the Habitats Directive.		
The environmental protection, objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.		
<p>The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive effects, and secondary, cumulative and synergistic effects, on issues such as:</p> <ol style="list-style-type: none"> <li>a. biodiversity;</li> <li>b. population;</li> <li>c. human health;</li> <li>d. fauna;</li> <li>e. flora;</li> <li>f. soil;</li> <li>g. water;</li> <li>h. air;</li> <li>i. climatic factors;</li> <li>j. material assets;</li> <li>k. cultural heritage, including architectural and archaeological heritage;</li> <li>l. landscape; and</li> <li>m. the interrelationship between the issues referred to in sub-paragraphs (a) to (l).</li> </ol>	<b>Chapters 6 and 7, and Appendix E.</b>	
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.	<b>Chapters 6 and 7, and Appendix E.</b>	
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.	<b>Chapters 2, 5, 6 and 7, and Appendices C, D, E and F.</b>	
A description of the measures envisaged concerning monitoring in accordance with regulation 17.	<b>Chapter 8.</b>	

SEA Regulations' Requirements	Where covered in this SA Report
<p>A non-technical summary of the information provided under paragraphs 1 to 9.</p>	<p>A separate non-technical summary document has been prepared to accompany this SA Report.</p>
<p>The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of:</p> <ul style="list-style-type: none"> <li>■ current knowledge and methods of assessment;</li> <li>■ the contents and level of detail in the plan or programme;</li> <li>■ the stage of the plan or programme in the decision-making process; and</li> <li>■ the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.</li> </ul> <p>(Regulation 12 (3))</p>	<p>Addressed throughout this SA Report.</p>
<p>Consultation</p>	
<p>When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible authority shall consult the consultation bodies.</p> <p>(Regulation 12(5))</p>	<p>Consultation on the SA Scoping Report was undertaken between March and April 2020.</p>
<p>Every draft plan or programme for which an environmental report has been prepared in accordance with regulation 12 and its accompanying report ("the relevant documents") shall be made available for the purposes of consultation in accordance with the following provisions of this regulation.</p> <p>As soon as reasonably practical after the preparation of the relevant documents, the responsible authority shall:</p> <ul style="list-style-type: none"> <li>■ send a copy of those documents to each consultation body;</li> <li>■ take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority's opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental Assessment of Plans and Programmes Directive ("the public consultees");</li> <li>■ inform the public consultees of the address (which may include a website) at which a copy of the relevant documents may be viewed, and the period within which, opinions must be sent.</li> </ul> <p>The period referred to in paragraph (2) (d) must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents.</p> <p>(Regulation 13 (1), (2), and (3))</p>	<p>Consultation is being undertaken in relation to the Joint Local Plan between November and December 2020. The consultation document is accompanied by this SA Report.</p>
<p>Where a responsible authority, other than the Secretary of State, is of the opinion that a plan or programme for which it is the responsible authority is likely to have significant effects on the environment of another Member State, it shall, as soon as reasonably practicable after forming that opinion:</p> <ul style="list-style-type: none"> <li>■ notify the Secretary of State of its opinion and of the reasons for it; and</li> <li>■ supply the Secretary of State with a copy of the plan or programme concerned, and of the accompanying environmental report.</li> </ul> <p>(Regulation 14 (1))</p>	<p>Unlikely to be relevant to the Joint Local Plan, as there will be no effects beyond the UK.</p>
<p>Taking the environmental report and results of the consultation into account in decision-making (relevant extracts of Regulation 16)</p>	
<p>As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall:</p> <ul style="list-style-type: none"> <li>■ make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge.</li> </ul> <p>(Regulation 16(1))</p>	<p>To be addressed after the Joint Local Plan is adopted.</p>

SEA Regulations' Requirements	Where covered in this SA Report
<p>As soon as reasonably practicable after the adoption of a plan or programme:</p> <ul style="list-style-type: none"> <li>■ the responsible authority shall inform (i) the consultation bodies; (ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and (iii) where the responsible authority is not the Secretary of State, the Secretary of State,</li> <li>■ that the plan or programme has been adopted, and a statement containing the following particulars:</li> <li>■ how environmental considerations have been integrated into the plan or programme;</li> <li>■ how the environmental report has been taken into account;</li> <li>■ how opinions expressed in response to: (i) the invitation in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;</li> <li>■ how the results of any consultations entered into under regulation 14(4) have been taken into account;</li> <li>■ the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>■ the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.</li> </ul>	
Monitoring	
<p>The responsible authority shall monitor the significant effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.</p> <p>(Regulation 17(1))</p>	<p>Requirement will be met after adoption of the Joint Local Plan.</p>

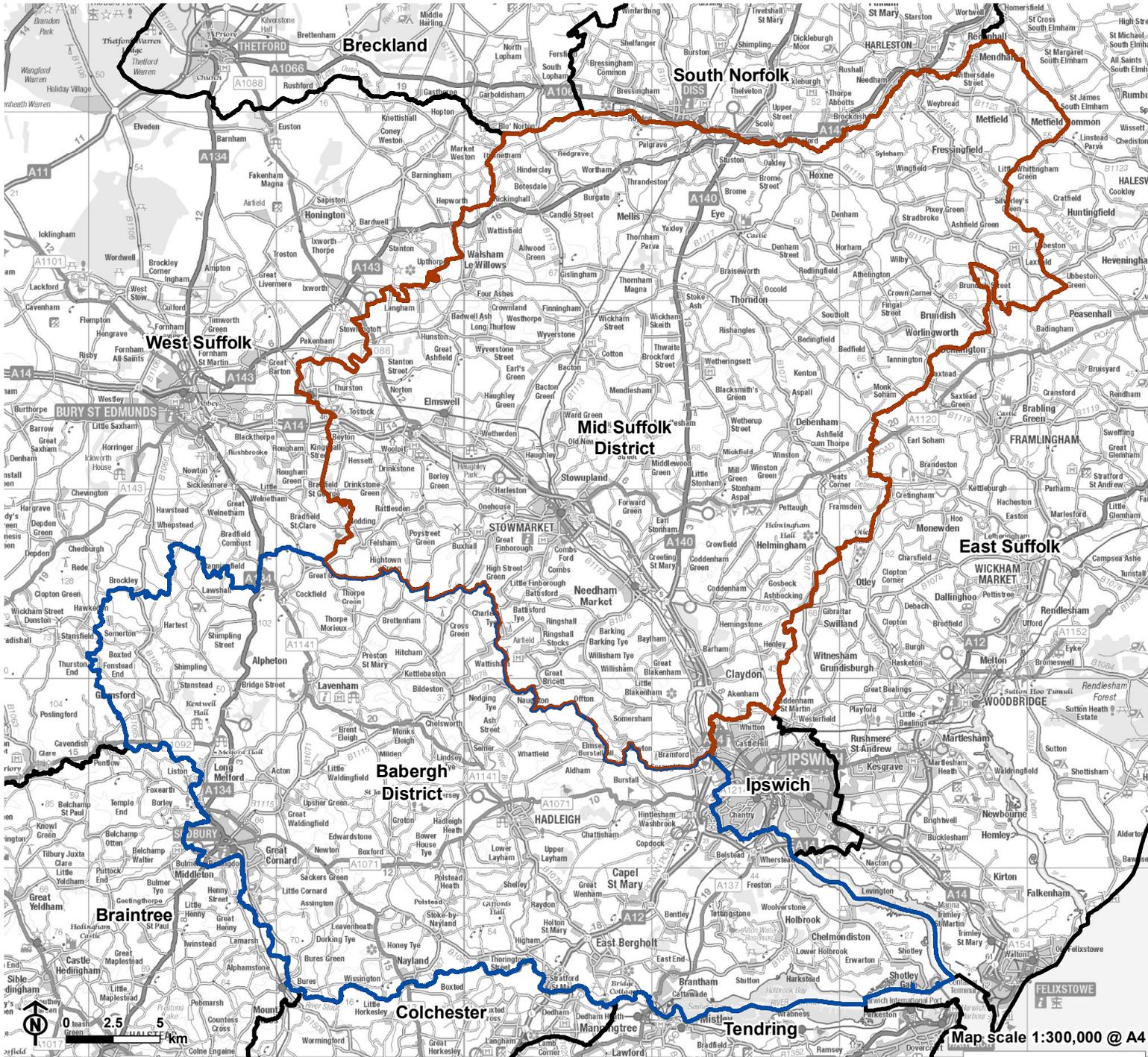


Figure 1.1: Location of Babergh and Mid Suffolk Plan area

- Babergh District
- Mid Suffolk District
- Neighbouring local authority

## Chapter 2

### Methodology

**Sustainability Appraisal should be carried out objectively and consistently and inform plan preparation from the start. This chapter explains how this has been achieved for the Sustainability Appraisal for the Babergh Mid Suffolk Joint Local Plan.**

**2.1** In addition to complying with legal requirements, the approach taken to the SA of the Babergh Mid Suffolk Joint Local Plan is based on current best practice and the guidance on SA/SEA set out in the national Planning Practice Guidance. This involves carrying out SA as an integral part of the plan-making process.

**2.2 Table 2.1** below sets out the main stages of the plan-making process and shows how these correspond to the SA process.

**2.3** This is followed by a description of the approach that has been taken to the SA of the Babergh Mid Suffolk JLP to date and provides information on the subsequent stages of the process.

**Table 2.1: Corresponding stages in plan making and SA**

Local Plan Step 1: Evidence Gathering and Engagement
SA Stages and Tasks
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope <ol style="list-style-type: none"> <li>1. Identifying other relevant policies, plans and programmes, and sustainability objectives</li> <li>2. Collecting baseline information</li> <li>3. Identifying sustainability issues and problems</li> <li>4. Developing the SA Framework</li> <li>5. Consulting on the scope of the SA</li> </ol>
Local Plan Step 2: Production
SA Stages and Tasks
Stage B: Developing and refining options and assessing effects <ol style="list-style-type: none"> <li>1. Testing the Local Plan objectives against the SA Framework</li> <li>2. Developing the Local Plan options</li> <li>3. Evaluating the effects of the Local Plan</li> <li>4. Considering ways of mitigating adverse effects and maximising beneficial effects</li> <li>5. Proposing measures to monitor the significant effects of implementing the Local Plan</li> </ol>
Stage C: Preparing the Sustainability Appraisal Report <ol style="list-style-type: none"> <li>1. Preparing the SA Report</li> </ol>
Stage D: Seek representations on the Local Plan and the Sustainability Appraisal Report <ol style="list-style-type: none"> <li>1. Public participation on Local Plan and the SA Report</li> <li>2. (i) Appraising significant changes</li> </ol>
Local Plan Step 3: Examination
SA Stages and Tasks
<ol style="list-style-type: none"> <li>2. (ii) Appraising significant changes resulting from representations</li> </ol>
Local Plan Step 4 & 5: Adoption and Monitoring
SA Stages and Tasks
<ol style="list-style-type: none"> <li>3. Making decisions and providing information</li> </ol>
Stage E: Monitoring the significant effects of implementing the Local Plan <ol style="list-style-type: none"> <li>1. Finalising aims and methods for monitoring</li> <li>2. Responding to adverse effects</li> </ol>

## Stage A: Scoping

**2.4** The SA process began with the production of an SA Scoping Report for the JLP. The Scoping stage of the SA involves understanding the social, economic and environmental baseline for the Plan area as well as the sustainability policy context and key sustainability issues.

**2.5** The scope of the SA has been constantly reviewed throughout the SA process, and updates published accordingly. Three Scoping Reports have been produced:

- The first SA Scoping Report was prepared internally by BMSDC and published for consultation in January 2017.
- A second SA Scoping Report was prepared by Place Services in April 2019, and subject to public consultation.
- The third and latest SA Scoping Report was prepared by LUC in March 2020.

**2.6** Each Scoping Report built upon the previous one, providing more up-to-date information, and refinements to the SA methodology to ensure that it remained fit for purpose.

**2.7** The most recent Scoping Report prepared by LUC in March 2020 presented the outputs of the following tasks:

- Policies, plans and programmes of relevance to the Joint Local Plan were identified and the relationships between them were considered, enabling any potential synergies to be exploited and any potential inconsistencies and incompatibilities to be identified and addressed (see **Appendix B (Policy Review and Baseline Information)**).
- Baseline information was collected on environmental, social and economic issues in Babergh and Mid Suffolk District Councils. This baseline information provides the basis for predicting and monitoring the likely effects of options for policies and site allocations and helps to identify alternative ways of dealing with any adverse effects identified (see **Appendix B (Policy Review and Baseline Information)**).
- Key sustainability issues for Babergh and Mid Suffolk were identified and their likely evolution without the implementation of the Joint Local Plan were considered (see **Table 3.1 in Chapter 3 (Sustainability Context for Development in Babergh and Mid Suffolk)**).
- A Sustainability Appraisal Framework was presented, setting out the SA Objectives against which options and subsequently policies would be appraised. The SA Framework provides a way in which the sustainability impacts of implementing a plan can be described, analysed and compared. It comprises a series of

sustainability objectives and associated sub-questions that can be used to 'interrogate' options and policies drafted during the plan-making process. These SA Objectives define the long-term aspirations of the Districts with regard to social, economic and environmental considerations. During the SA, the performances of the spatial strategy options, policies and sites are assessed against these SA Objectives and sub-questions (see **Table 2.5**). It should be noted that the main components of the SA Framework, in particular the SA Objectives, remained largely the same during the SA process.

**2.8** Public and stakeholder participation is an important part of the SA and wider plan-making processes. It helps to ensure that the SA report is robust and has due regard for all appropriate information that will support the plan in making a contribution to sustainable development. The most recent SA Scoping Report for the JLP was published for consultation between March and April 2020 with the three statutory consultees (Natural England, the Environment Agency and Historic England), a number of other stakeholders identified by the Council and members of the public.

**2.9 Appendix A (Consultation Comments)** lists the comments that were received during the consultation on the SA Scoping Report and describes how each one has been addressed during the preparation of this SA Report. In light of the comments received, a number of amendments were made to the review of plans, policies and programmes, the baseline information and the key sustainability issues. The updated versions of these are presented in this document. A number of comments received in relation to the SA Scoping Report also related to the SA Framework, which prompted a number of changes to it. These are also highlighted in **Table 2.5**.

**2.10** The review of plans, policies and programmes and the baseline information are summarised in **Chapter 3 (Sustainability Context for Development in Babergh and Mid Suffolk)**. The full, updated review of plans, policies and programmes and the baseline information are included in **Appendix B (Policy Review and Baseline Information)**.

## Stage B: Developing and refining options and assessing effects

**2.11** Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the SA help to identify where there may be 'reasonable alternatives' to the options being considered for a plan.

**2.12** Regulation 12 (2) of the SEA Regulations requires that:

*“The (environmental or SA) report must identify, describe and evaluate the likely significant effects on the environment of—*

- (a) implementing the plan or programme; and*
- (b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme.”*

**2.13** Any alternatives considered for the plan need to be ‘reasonable’. This implies that alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g. the National Planning Policy Framework) or site options that are unavailable or undeliverable.

**2.14** The SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for the plan.

**2.15** This section provides an overview of how the appraisal of options has been undertaken and how this will feed into the development of the Babergh Mid Suffolk Joint Local Plan.

#### Identification and appraisal of options

**2.16** The consideration of reasonable alternatives has been a key focus of attention throughout the SA process.

**2.17** In August 2017, BMSDC identified a series of high level policy options that were subject to appraisal. These fell into the following broad themes: housing, economy, environment, infrastructure and place. Under ‘housing’ this included the appraisal of a range of spatial distribution options.

**2.18** In July 2019, Place Services carried out a comprehensive appraisal of detailed spatial strategy and policy options. The SA at this stage also included the appraisal of a large number of site options for potential allocation in the JLP.

**2.19** More detail on the options covered by the earlier SA work is provided in **Chapter 4 (Summary of Previous Sustainability Appraisal Work Undertaken)** of this SA Report.

**2.20** Following on from this earlier SA work, BMSDC decided it would be both prudent and helpful to consider afresh the range of reasonable alternatives for all aspects of the JLP. This was to ensure that the appraisal of the preferred approach and the reasonable alternatives was as objective and robust as reasonably practical, and to identify whether any amendments should be made to the preferred approach.

The ultimate aim was to provide BMSDC with the confidence and reassurance that the preferred JLP as proposed to be submitted was an appropriate plan when compared to the reasonable alternatives.

**2.21** LUC was therefore appointed in November 2019 to review the appraisal work undertaken to date. As a result of this it was decided to review the range of spatial strategy options and subject them to appraisal again. As part of this process, LUC identified information gaps with respect to landscape evidence and historic environment evidence. BMSDC therefore commissioned detailed studies to ensure that the findings could inform the SA.

**2.22** The results of LUC’s appraisal of reasonable alternatives are reported in **Chapter 5 (Sustainability Appraisal Findings for the Spatial Strategy Options)**, **Chapter 6 (Sustainability Appraisal of Reasonable Alternative Sites)** and **Chapter 7 (Sustainability Appraisal Findings for the JLP)**. As a result of this latest round of SA, a number of changes were made to the preferred approach of the JLP.

#### Stage C: Preparing the Sustainability Appraisal Report

**2.23** This SA Report describes the process that has been undertaken to date in carrying out the SA of the Babergh Mid Suffolk Joint Local Plan. It contains an appraisal of alternative spatial strategy options as well as the potential sites for housing and employment considered for inclusion in the JLP, as well as the policies in the JLP itself.

**2.24** The focus of the appraisal has been the identification of significant effects, whether positive or negative, in accordance with the SEA Regulations.

**2.25** This SA Report is intended to meet all the reporting requirements of Schedule 1 of the SEA Regulations.

#### Stage D: Consultation on the Joint Local Plan and this SA Report

**2.26** Babergh and Mid Suffolk District Councils are inviting comments on the new Joint Local Plan (2020) and this SA Report. These documents are being published on the Council’s website for consultation from November to December 2020.

**2.27 Appendix A (Consultation Comments)** presents the consultation comments received on the 2019 SA Scoping Report and 2019 Preferred Options SA produced by Place Services (see **Chapter 4 (Summary of Previous Sustainability Appraisal Work Undertaken)** for more information on previous SA work undertaken to date). Appendix A also contains the consultation comments that were received in relation to the 2020 SA Scoping Report.

**2.28** In each instance, an explanation is given on how consultation comments have been addressed during the course of the SA.

## Stage E: Monitoring and implementation of the Joint Local Plan

**2.29 Chapter 8 (Monitoring)** sets out suggested monitoring measures for potential negative effects that could arise as a result of the Joint Local Plan.

## Appraisal methodology

### SA Framework

**2.30** The development of a set of SA Objectives (known as the SA Framework) is a recognised way in which the likely environmental and sustainability effects of a plan and reasonable alternatives can be described, analysed and compared.

**2.31** The SA Framework for the Babergh and Mid Suffolk JLP is presented in **Table 2.5** and was originally developed by BMSDC and then refined by Place Services from the analysis of international, national and local policy objectives, baseline information, and key sustainability issues identified in the plan area.

**2.32** The SA Framework comprises a series of SA Objectives, each accompanied by a set of guide questions that were used to appraise the performance of the JLP against the SA Objectives, including alternative overall spatial strategies for growth being considered by the two Councils for inclusion in the JLP.

**2.33** The relationship between the key sustainability issues and the SA Objectives is described in **Table 3.1** of this SA Report.

**2.34** The relationship between the 'SEA Topics', which are the specific topics that SEA is required to cover, as per Schedule 2 of the SEA Regulations, is shown in the final column of **Table 2.5**. It can be seen that a number of the SA Objectives cut across SEA Topics, showing how inter-related many of these are.

### Site Assessment Criteria and Assumptions

**2.35** SA inevitably relies on an element of subjective judgement. However, in order to ensure consistency in the appraisal of the site options, for each of the SA Objectives in the SA Framework, a clear set of decision-making criteria and assumptions for determining significance of the effects were developed. These assumptions set out clear parameters within which certain SA scores would be given, based on factors such as the distance of site options from features such

as biodiversity designations, public transport links and areas of high landscape sensitivity. The assumptions, many of which are applied through the use of Geographical Information Systems (GIS) data, are presented in **Appendix C (Assumptions Applied for the Sustainability Appraisal of Site Options)**. The performance of the sites against the Site Assessment Criteria and Assumptions were used, alongside other technical assessments, to inform BMSDC's selection of individual site allocations.

### Refinements to the SA Framework and Site Assessment Criteria and Assumptions

#### SA Framework

**2.36** As a result of the review of the earlier SA work undertaken for the JLP, LUC proposed some refinements to the original SA Framework developed by BMSDC and by Place Services. These refinements were only minor because the SA Framework, in LUC's view, was robust and accurately reflected the key sustainability issues identified in both Districts, whilst covering all the SEA Topics. Additionally, adhering to the original SA Framework maintained consistency with the previous SA work.

#### Site Assessment Criteria and Assumptions

**2.37** In the 2020 SA Scoping Report, LUC proposed to make refinements to the Site Assessment Criteria and Assumptions developed by Place Services, which are summarised below.

- The previous Site Assessment Criteria and Assumptions recorded effects as being either positive, negative, negligible or uncertain/unknown effects. In order to provide greater definition to the positive and negative effects, it was proposed that these be split between 'major' and 'minor' positive or negative effects. This was to help distinguish between how well potential site allocations perform against the criteria and also assist in the identification of potentially significant effects.
- A number of the Site Assessment Criteria and Assumptions were refined to ensure they related more clearly to the SA Objective concerned, and to avoid duplication of assessment.
- Some of the Site Assessment Criteria and Assumptions were refined to reflect new evidence gathered by BMSDC. This included a Heritage Impact Assessment and a Landscape Sensitivity Assessment.
- Some of the distance criteria by which effects were identified as potentially occurring were refined to reflect, first, the proposed division between 'major' and 'minor' effects and, second, to relate more closely to the guide distances set out by the Institute of Highways and

Transportation which have successfully been used on SA of local plans elsewhere, and which have achieved adoption.

### Amendments to the SA Framework and Site Assessment Criteria and Assumptions following Scoping

**2.38** The SA Framework was subject to some further changes following feedback collated during consultation on the SA Scoping Report with the three statutory consultation bodies (Environment Agency, Historic England and Natural England) under Regulation 12(5) of the SEA Regulations, a number of other stakeholders identified by the Council and members of the public.

**2.39** As was the case with the SA Framework, the Site Assessment Criteria and Assumptions were also subject to further changes following consultation on the SA Scoping Report between March and April 2020. **Table C.3 in Appendix C (Assumptions Applied for the Sustainability Appraisal of Site Options)** sets out the amendments that were made to the residential Site Assessment Criteria and Assumptions in detail. A new set of assessment criteria and assumptions were developed for the employment sites. Further refinements were also made where necessary once the site SAs commenced in order to make sure that they were robust and providing results that appeared reasonable.

**2.40** Once the effects for the residential and employment sites had been generated, LUC went through each site to identify whether any physical barriers were present that could result in the downgrading of 'scores' for certain criteria. A summary was then written for each of the 111 parishes outlining the major positive and major negative effects that each site within these parishes had scored against the criteria.

### Assumptions regarding distances

**2.41** Reference is made to distances in the Site Assessment Criteria and Assumptions. The most sustainable and easily achievable mode of transport is walking, and the distances relate to walking distances.

**2.42** There are a number of pieces of research that give a variety of recommended guidance distances for walking. For example, the Institute of Highways and Transportation found that the average length of a walk journey is one kilometre. The Institute of Highways and Transportation categorises distances depending upon location and purpose of the trip, and 'desirable', 'acceptable' and 'preferred maximum':

**Table 2.2: Institute of Highways and Transportation Walking distances**

	Town centres (m)	Commuting/ school/ sight-seeing (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1,000	800
Preferred maximum	800	2,000	1,200

**2.43** For the purposes of the appraisal, distances in the appraisal will be measured as the straight line distance from the edge of the site option to existing services and facilities, and therefore actual walking distances are likely to be greater (e.g. depending on the house location within a larger site and the availability of a direct route).

**2.44** Given the wide range of services and facilities normally considered in SAs, LUC has developed some guideline distances that it uses in its SA work, which are reflected in the SA Site Assessment Criteria and Assumptions for BMSDC JLP. These guideline distances are set out below in **Table 2.3**. Some of the distances have been changed in response to consultation comments received on the 2020 SA Scoping Report.

**Table 2.3: Walking distance assumptions**

Site assessment criterion: Proximity to...	Desirable	Acceptable	Preferred maximum
GP surgeries/ health centres	<= 400 m	401-800 m	801-1,200 m
Primary schools	<= 400 m	401-800 m	801-1,200 m
Secondary schools	<= 500 m	501-1,000 m	1001-2,000 m
Further and higher education facilities	<= 500 m	501-1,000 m	1001-2,000 m
District centres	<= 200 m	201-400 m	401-800 m
Town centres	<= 400 m	401-800 m	801-1,200 m
Railway stations	<= 500 m	501-1,000 m	1001-2,000 m
Bus stops	<= 300 m	301-600 m	601-1,000 m

Site assessment criterion: Proximity to...	Desirable	Acceptable	Preferred maximum
Cycle paths	<= 200 m	201-400 m	401-800 m
Open spaces and sports centres	<= 300 m	301-800 m	801-1,200 m
Public rights of way (PRoW)	<= 200 m	201-400 m	401-800 m
Centres of employment	<= 500 m	501-1,000 m	1,001-2,000 m

### Significance scoring

**2.45** The dividing line between sustainability scores is often quite small. Significant effects have been distinguished from more minor effects using:

- The SA Framework 'Guide Questions'
- The Site Assessment Criteria and Assumptions
- Professional judgement, where necessary.

**2.46** The effect of an option on an SA Objective was considered to be significant where it is of such magnitude that it will have a noticeable and measurable effect compared with other factors that may influence the achievement of that SA Objective.

**2.47** The detailed site appraisals identify the performance of the sites against a large number of individual criteria, of which there can be up to four for a single SA Objective. This approach was used in order to retain consistency with the approach undertaken in the earlier SA work.

**2.48** However, in order to synthesise the scores against criteria into single 'significance' scores for each SA Objective, an additional step was introduced across all sites. The approach is set out in the final column of **Table C.1** and **Table C.2** in **Appendix C (Assumptions Applied for the Sustainability Appraisal of Site Options)** for residential and employment sites, respectively.

**2.49** For each SA Objective, one of two approaches were adopted. The first approach was to assign numerical scores for each criterion as follows:

- A major positive effect was given +3
- A minor positive effect was given +1
- A negligible effect was given 0
- A minor negative effect was given -1
- A major negative effect was given -3

**2.50** The scores for the individual criteria were then totalled and averaged. A significance score was then assigned based on this average as follows:

- If the average score was  $\geq +2$  a significant positive effect was identified (++)
- If the average score was  $>0$  to  $<2$  a minor positive effect was identified (+)
- If the average score was 0 a negligible effect was identified (0)
- If the average score was  $<0$  to  $>-2$  a minor negative effect was identified (-)
- If the average score was  $\leq -2$  a significant negative effect was identified (--)

**2.51** A similar scoring method was used for carbon emissions from transport (SA Objective 9, criterion 9a), although the numerical values were higher as this was measured by totalling a combination of scores from a number of other criteria.

**2.52** The second approach for some SA Objectives, primarily ones relating to the environment, was to consider each criterion individually, and to define significance scores based on the relevant weight that was appropriate to each criterion, as this was considered to be more robust than averaging scores.

**2.53** In this way, a single significance score was developed for each SA Objective for each residential or employment site, which allowed for consistent, objective and easier comparison of performance of different sites.

### Key to SA scoring symbols

**2.54** The findings of the SA are presented as colour coded symbols showing a score for each option against each of the SA Objectives along with a concise justification for the score given, where appropriate.

**2.55** The colour coding is shown in **Table 2.4** below.

**Table 2.4: Key to SA scoring symbols**

++	Significant/major positive effect likely
++/-	Mixed significant/major positive and minor negative effects likely
+	Minor positive effect
+/-	Mixed minor effects likely
-	Minor negative effect likely

--/+	Mixed significant/major negative and minor positive effects likely
--	Significant/major negative effect likely
0	Negligible effect likely
?	Likely effect uncertain
N/A	Not applicable or relevant

### Cumulative effects

**2.56** The identification of cumulative effects was addressed in three ways (see **Chapter 7 (Sustainability Appraisal Findings for the Joint Local Plan)**):

- The potential cumulative effects on individual settlements where there is more than one site allocation.
- The cumulative effects of the JLP as a whole (i.e. of all the policies and site allocations in the JLP).
- The potential for cumulative effects of the JLP with other planned development, such as adopted or emerging Local Plans for neighbouring districts.

### Difficulties encountered

**2.57** It is a requirement of the SEA Regulations that consideration be given to any data limitations or other difficulties that are encountered during the SA process.

**2.58** The high-level nature of the Spatial Strategy Options assessed in this SA Report, meant that at times it was difficult to assess in detail the likely effects of the options on each SA Objective.

**2.59** There was a need to ensure that a large number of site options could be appraised consistently. This was achieved by the use of assumptions relating to each SA Objective, as described above.

**2.60** The assumptions are presented in **Appendix C (Assumptions Applied for the Sustainability Appraisal of Site Options)** and include a range of distance thresholds.

These are based on the suggested acceptable walking distances presented in Guidelines for Providing for Journeys on Foot (The Institution of Highways and Transportation, 2000). However, distances to bus stops were increased in light of evidence that the IHT Guidelines may be too constrained. It cannot be known which route people will take and this is likely to vary depending on the starting point of each individual's journey. Therefore, for consistency, these thresholds use straight line measurements from the boundary of a site. However, adjustment to scores were made to take

into account barriers to movement (e.g. railway lines, rivers/canals, dual carriageways).

**2.61** Difficulties and limitations relating to specific SA Objectives are detailed below.

### SA Objective 1: To improve the health and wellbeing of the population overall and reduce health inequalities

#### Criterion 1a (GP surgeries)

**2.62** When considering proximity of site allocation options to health facilities, only NHS GP facilities were considered. This is because these are the facilities most likely to be used by local residents.

### SA Objective 2: To maintain and improve levels of education and skills in the population overall

#### Criteria 2a (Primary schools) and 2b (Secondary schools)

**2.63** When considering proximity of site allocation options to existing schools, only state schools were considered. This is because these schools are open to all and it is expected the majority of school age residents will attend state schools. In addition, local catchments may not apply to independent schools, for which pupils will often travel further.

**2.64** School capacity information in both Districts is confidential. Therefore, it is unknown whether each individual school has capacity to accept new pupils or not.

### SA Objective 3: To reduce poverty and social exclusion and ensure access to jobs and services.

#### Criterion 3b (Settlement hierarchy)

**2.65** This criterion previously referred to town, district, local and neighbourhood centres. However, GIS data on local and neighbourhood centres was not available and it was only possible to rely on defined town and district centres.

**2.66** Given the lack of more localised information it was decided that the proposed settlement hierarchy provides a reasonably robust proxy that distinguishes between those settlements that have the services and facilities that might be expected to be present in town, district, local and neighbourhood centres. This categorisation was therefore used to populate criterion 3b.

### SA Objective 9: To reduce contribution to climate change

#### Criterion 9a (Transport links)

**2.67** With regard to reducing both Districts' contribution to climate change, it is acknowledged that not all greenhouse gas emissions arise as a result of transport, although the largest proportion of CO<sub>2</sub> emissions generated in Babergh and Mid Suffolk are as a result of transport.

**2.68** When assessing potential site allocations, one of the primary measurements of the impact of that site on reducing its contribution to climate change is whether it will minimise car travel. Therefore, criterion 9a (Transport links) focused on proximity to sustainable transport links, and proximity to jobs and to services and facilities, including GP surgeries and educational facilities.

**2.69** Whilst it is acknowledged that the presence of sustainable transport links and being within close proximity to services and facilities will not necessarily result in all residents using them, it is expected that more people will travel by sustainable transport than in other locations.

**SA Objective 16: To enable efficient patterns of movement and modal shift towards sustainable modes of transport**

**2.70** When assessing potential site allocations, the primary measurement of the impact of that site on achieving a modal shift towards sustainable modes of transport is whether it will reduce car travel. Therefore, this objective focuses on proximity to sustainable transport links. Whilst it is acknowledged that the presence of sustainable transport links will not necessarily result in all residents using them, it is expected that more people will travel by sustainable transport than in other locations.

**Broadband**

**2.71** The Site Assessment Criteria and Assumptions do not take into consideration Broadband connectivity because it was considered that this is a very localised issue, the status of which can change very quickly. The Government has several programmes in place with the aim to increase speeds and access to Broadband for homes and businesses, and it is likely Broadband connectivity will change very rapidly in a number of areas over the plan period.

Table 2.5: SA Framework (text in red indicates amendments to the SA Framework since the 2019 SA Report)

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

SA Objective	Guide Questions	Relevant SEA Topics
<p>4. To meet the housing requirements of the whole community.</p>	<p>(4.1) Will it meet the housing requirements of the whole community?  (4.2) Will it reduce homelessness?  (4.3) Will it contribute to meeting demand for a range and mix of housing including affordable housing and specialist housing?  (4.4) Will it reduce the number of unfit homes?  (4.5) Does the proposal include homes that can be adapted to support independent living for older and disabled people?  (4.6) Does the proposal address the housing needs of older people, i.e. extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes?</p>	<p>Population  Human Health  Material Assets</p>
<p>5. To conserve and enhance water quality and resources.</p>	<p>(5.1) Will it protect and enhance water resources?  (5.2) Will it support the achievement of Water Framework Directive targets?  (5.3) Will it protect and improve the quality of inland waters?  (5.4) Will it protect and improve the quality of coastal waters?  (5.5) Will it promote sustainable use of water?  (5.6) Will it maintain water availability or water dependent habitats?  (5.7) Will it support the provision of sufficient water supply and treatment infrastructure?  (5.8) Does the proposal incorporate sustainable design and construction techniques?</p>	<p>Water  Biodiversity, Fauna and Flora  Material Assets</p>
<p>6. To maintain and where possible improve air quality and reduce noise pollution.</p>	<p>(6.1) Will it protect and improve air quality?  (6.2) Does the proposal minimise noise pollution caused by traffic and commercial uses?  (6.3) Will it avoid exacerbating existing air quality issues in designated AQMAs?  (6.4) Does the proposal incorporate sustainable design and construction techniques?</p>	<p>Air  Human Health</p>
<p>7. To conserve soil and mineral resources.</p>	<p>7.1) Will it minimise the loss of open countryside to development?  (7.2) Will it minimise loss of the best and most versatile agricultural land to development?  (7.3) Does the proposal make best use of existing land?  (7.4) Will it maintain and enhance soil quality?  (7.5) <del>Will it promote sustainable use of minerals</del> Will the proposals minimise the sterilisation of minerals resources?</p>	<p>Soil  Material Assets</p>

SA Objective	Guide Questions	Relevant SEA Topics
8. To promote the sustainable management of waste.	(8.1) Will it reduce household waste generated /head of population? (8.2) Will it reduce commercial and industrial waste generated /head of population? (8.3) Will it increase rate /head of population of waste reuse and recycling? / Does the proposal encourage recycling (including building materials)? (8.4) Does the proposal incorporate sustainable design and construction techniques?	Material Assets
9. To reduce contribution to climate change.	(9.1) Will it reduce emissions of greenhouse gases /head of population by reducing energy consumption? (9.2) Will it increase the proportion of energy needs being met by renewable sources? (9.3) Does the proposal incorporate renewable energy? (9.4) Does the proposal contain homes that are highly energy efficient? <u>(9.5) Will it reduce people's reliance on the private car through greater accessibility to sustainable modes of transport (e.g. rail, bus and walking)?</u> <u>(9.6) Will it accommodate electric vehicles?</u>	Climatic Factors
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	(10.1) Will it minimise the risk of flooding to people, <del>and</del> property <u>and infrastructure</u> from rivers and watercourses? (10.2) Will it minimise the risk of flooding to people, <del>and</del> property <u>and infrastructure</u> on the estuary? (10.3) Will it reduce the risk of estuarine erosion? (10.4) Will it reduce the risk of damage to people, <del>and</del> property <u>and infrastructure</u> from extreme weather events? (10.5) Does the proposal incorporate sustainable design and construction techniques? (10.6) Does the proposal ensure that buildings and public spaces are designed to respond to winter and summer temperatures, i.e. ventilation, shading and landscaping? (10.7) Does the proposal incorporate sustainable urban drainage techniques?	Water Climatic Factors Human Health Biodiversity, Flora and Fauna Material Assets
11. To conserve and enhance biodiversity and geodiversity.	(11.1) Will it maintain and enhance European designated nature conservation sites? (11.2) Will it maintain and enhance nationally designated nature conservation sites? (11.3) Will it maintain and enhance locally designated nature conservation sites? (11.4) Will it avoid disturbance or damage to protected species and their habitats? (11.5) Will it help deliver the targets and actions for habitats and species within the Suffolk Biodiversity Action Plan?	Biodiversity, Flora and Fauna

SA Objective	Guide Questions	Relevant SEA Topics
	<p>(11.6) Will it help to reverse the national decline in farmland birds?</p> <p>(11.7) Will it protect and enhance sites, features and areas of geological value in both urban and rural areas?</p> <p>(11.8) <del>Will it lead to the creation of new habitat</del><u>Will it ensure ecological networks are not compromised, and future improvements are not prejudiced?</u></p> <p>(11.9) <del>Does the proposal maintain or enhance biodiversity?</del><u>Will it lead to measurable net gain for biodiversity?</u></p> <p><u>(11.10) Will it ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced?</u></p>	
<p>12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.</p>	<p>(12.1) Will it protect and enhance buildings, monuments, sites, places, areas and landscapes of heritage interest or cultural value (including their setting) meriting consideration in planning decisions?</p> <p>(12.2) Will it protect and enhance sites, features and areas of archaeological value in both urban and rural areas?</p> <p>(12.3) Will it enhance accessibility to cultural heritage assets?</p>	<p>Cultural Heritage, Architectural and Archaeological Heritage</p>
<p>13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.</p>	<p>(13.1) Will it conserve and enhance the AONB <u>and its setting?</u></p> <p>(13.2) Will it reduce the amount of derelict, degraded and underused land?</p> <p>(13.3) Will it protect and enhance the settlement and its setting within the landscape? / Will it protect and enhance landscape character / <u>Will it protect and enhance valued landscapes?</u></p>	<p>Landscape</p> <p>Cultural Heritage, Architectural and Archaeological Heritage</p>
<p>14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.</p>	<p>(14.1) Will it improve business development and enhance competitiveness?</p> <p>(14.2) Will it improve the resilience of business and the economy?</p> <p>(14.3) Will it promote growth in key sectors?</p> <p>(14.4) Will it improve economic performance in disadvantaged areas?</p> <p>(14.5) Will it encourage rural diversification?</p> <p>(14.6) Will it encourage indigenous business?</p> <p>(14.7) Will it encourage inward investment?</p> <p>(14.8) Will it make land available for business development?</p> <p>(14.9) Is there a range of retail uses, including food stores and smaller affordable shops for social enterprises?</p> <p>(14.10) Does the proposal include managed and affordable workspace for local businesses?</p>	<p>Population</p> <p>Human Health</p> <p>Material Assets</p>

SA Objective	Guide Questions	Relevant SEA Topics
15. To revitalise the Districts' town centres.	(15.1) Will it increase the range of employment opportunities, shops and services available in town? (15.2) Will it decrease the number of vacant units in town centres? (15.3) Will it enhance the viability and vitality of the Districts' centres?	Population Material Assets
16. To encourage efficient patterns of movement and <del>the use of sustainable methods of travel in support of economic growth</del> <u>modal shift towards sustainable modes of transport.</u>	(16.1) Will it reduce commuting? (16.2) Will it improve accessibility to work by public transport, walking and cycling? (16.3) Would it promote the use of sustainable travel modes and reduce dependence on the private car, <u>including enabling the provision or enhancement of public transport in rural areas?</u> (16.4) Will it increase the proportion of freight transported by rail or other sustainable modes?	Population Air Human Health Climatic Factors Material Assets

## Chapter 3

# Sustainability Context for Development in Babergh and Mid Suffolk

This chapter summarises the policy context for the preparation of the Joint Local Plan and the key sustainability issues facing Babergh and Mid Suffolk.

### Review of plans, policies and programmes

**3.1** The Babergh Mid Suffolk Joint Local Plan is not prepared in isolation, being greatly influenced by other plans, policies and programmes and by broader sustainability objectives. It must be consistent with international and national guidance and strategic planning policies and should contribute to the goals of a wide range of other programmes and strategies, such as those relating to social policy, culture and the historic environment. It must also conform to environmental protection legislation and the sustainability objectives established at an international, national and local level.

**3.2** During the Scoping stage of the SA, a review was undertaken of the other plans, policies and programmes that are relevant to the Joint Local Plan. The key points are summarised below and the full, updated review can be found in **Appendix B (Policy Review and Baseline Information)**.

**3.3** Schedule 2 of the SEA Regulations requires the SA to provide:

(1) *“An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.”*

...and...

(5) The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.

**3.4** It is therefore necessary to identify the relationships between the Babergh Mid Suffolk Joint Local Plan and the relevant plans, policies and programmes so that any potential

links can be built upon and any inconsistencies and constraints addressed.

### Key international plans, policies and programmes

**3.5** At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') are particularly significant as they require Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to be undertaken in relation to the emerging Local Plan. These processes should be undertaken iteratively and integrated into the production of the plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated.

**3.6** There are a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law through national-level policy.

**3.7** The UK left the EU in January 2020, although it is still subject to most EU legislation until the end of the transition period. Following the end of the transition period, most EU law will continue to apply as a result of provisions in the European Union (Withdrawal) Act 2018 (EUWA) and the 'EU Exit' amendments to domestic legislation.

### Key national plans, policies and programmes

**3.8** Arguably the most significant national policy context for the Babergh Mid Suffolk Joint Local Plan is the National Planning Policy Framework (NPPF), which was first published in 2012. The Local Plan must be consistent with the requirements of the NPPF, which was updated and revised in July 2018, with further amendments in 2019<sup>5</sup>. The NPPF sets out information about the purposes of local plan-making, stating that:

*“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”*

**3.9** The NPPF requires local planning authorities to set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver sufficient provision for:

- housing (including affordable housing), employment, retail, leisure and other commercial development;
- infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- community facilities (such as health, education and cultural infrastructure); and
- conservation and enhancement of the natural, built and historic environment, including landscapes, green infrastructure, and planning measures to address climate change mitigation and adaptation.

**3.10** In addition, Local Plans should:

- be prepared with the objective of contributing to the achievement of sustainable development;
- be prepared positively, in a way that is aspirational but deliverable;
- be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- be accessible through the use of digital tools to assist public involvement and policy presentation; and
- serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area.

### Neighbouring Local Plans

**3.11** Throughout the preparation of the Local Plan and the SA process, consideration will be given to the local plans being prepared by the authorities around Babergh and Mid Suffolk. The development proposed in those authorities could give rise to in-combination effects with the effects of the Babergh Mid Suffolk Joint Local Plan, and the effects of the various plans may travel across local authority boundaries. There are eight authorities that border Babergh and Mid Suffolk:

- West Suffolk Council
- Breckland Council
- South Norfolk Council

<sup>5</sup> Ministry of Housing, Communities and Local Government (June 2019) National Planning Policy Framework:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

- East Suffolk Council
- Ipswich Borough Council
- Tendring District Council
- Colchester Borough Council
- Braintree District Council.

**3.12** In addition, Suffolk County Council has responsibility for waste and minerals planning in the area, as well preparing Local Transport Plans.

### Neighbourhood Plans

**3.13** Neighbourhood Plans are prepared at the local level by a parish council, town council or neighbourhood forum. Once adopted, they form part of the formal Development Plan of the area in which they are located.

**3.14** At the time of writing, there were 13 'made' (adopted) Plans within BMSDC. These are as follows:

- Aldham Neighbourhood Plan 2018-2036
- Botesdale & Rickinghall Neighbourhood Plan 2017-2036
- Debenham Neighbourhood Plan 2016-2036
- East Bergholt Neighbourhood Plan 2015-2030
- Elmsett Neighbourhood Plan 2017
- Fressingfield Neighbourhood Development Plan 2018-2036
- Haughley Parish Neighbourhood Plan 2016-2036
- Lavenham Neighbourhood Plan
- Lawshall Neighbourhood Plan 2016-2036
- Mendlesham Neighbourhood Plan 2016-2031
- Stowupland Neighbourhood Development Plan 2016-2036
- Stradbroke Neighbourhood Plan 2016-2036
- Thurston Neighbourhood Development Plan 2018-2036.

**3.15** In addition, around 40 Neighbourhood Plans are in progress.

### Baseline information

**3.16** Schedule 2 of the SEA Regulations requires the 'environmental report' to include a description of:

(3) "The environmental characteristics of areas likely to be significantly affected."

**3.17** Given that SA embraces social and economic matters, as well as the environment, the scope of information to be collected is wide ranging. This 'baseline information' provides the context for assessing the sustainability of proposals in the Babergh Mid Suffolk Joint Local Plan and it provides the basis for identifying trends, predicting the likely effects of the plan and monitoring its outcomes. The requirements for baseline data vary widely, but it must be relevant to environmental, social and economic issues, be sensitive to change and should ideally relate to records which are sufficient to identify trends.

**3.18** The SEA Regulations lists specific topics (the SEA Topics) that need to be considered. These are biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between the above factors.

**3.19** As an integrated SA and SEA is being carried out, baseline information relating to other sustainability topics has also been included; for example, information about housing, education, transport, energy, waste and economic growth. This information was originally presented in the March 2020 SA Scoping Report and an updated version has been included in **Appendix B (Policy Review and Baseline Information)**.

**3.20** To set the context for the SA, a portrait of the two Districts below is provided in the box below.

### **A portrait of Babergh and Mid Suffolk**

Babergh and Mid Suffolk are largely rural Districts in the county of Suffolk. At the 2011 Census their combined population was around 185,000 residents, with slightly more people living in Mid Suffolk than Babergh. Although largely rural, the market towns of Hadleigh and Sudbury in Babergh District, and Stowmarket, Needham Market and Eye in Mid Suffolk provide focal points for the surrounding settlements for jobs, services and facilities. Around two-thirds of the population live in the villages and hamlets of the two Districts.

The two Districts have strong relationships with neighbouring areas, particularly the towns of Ipswich to the east and Bury St Edmunds to the west, and to a lesser extent Colchester to the south. They lie on important components of the strategic road network, most notably the A14, which links the port of Felixstowe on the south Suffolk coast with the M1 and M6 in Leicestershire, via Ipswich, Bury St Edmunds, Cambridge, Huntingdon and Kettering, with Stowmarket and Needham Market strategically placed towards the eastern end of this route. The A12 passes through the eastern part of Babergh between Ipswich and Colchester, and on to London, and the A140 branches off the A14 east of Needham Market to create a link with Norwich to the north passing close to Eye. The two Districts are less well served by rail, especially Babergh which has no mainline railway stations. However, a railway route follows the A14 corridor, providing a number of stations as it passes from Ipswich to Cambridge and beyond. The main transport corridors tend to be the main focus of air and noise pollution, although these are not a significant problem. However, an Air Quality Management Area (AQMA) has been designated in Sudbury, and there are several more AQMAs in neighbouring Ipswich and Bury St Edmunds.

The two Districts are rich in environmental assets, including the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and Dedham Vale AONB (also known as 'Constable Country' after the great landscape painter) to the east and south in Babergh. The Districts are known for their historic interest, with particularly fine historic towns such as Lavenham, Hadleigh and Eye. Between them the two Districts are home to 60 conservation areas, 70 scheduled monuments, and over 6,400 listed buildings, as well as important historic landscapes and parks and gardens.

Similarly, there is considerable wildlife interest, including the Orwell and Stour estuaries in the south-east, which are Ramsar sites, designated for their international importance as wetlands under the Ramsar Convention and also Special Protection Areas which are European designations, with respect to internationally important populations of birds. There is also a large number of Sites of Special Scientific Interest (SSSIs), as well as locally designated County Wildlife Sites and Local Nature Reserves, as well as priority habitats, being those wildlife areas identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan. Quite large areas of the two Districts, particularly in the northern half of Mid Suffolk have fewer designated habitats but are important for farming because of their high grade agricultural land.

In common with much of Eastern England, water resources are under stress and there is a risk of harm to water quality from demands from development placed on waste water treatment plants. Both of these issues could get worse as a result of climate change. The main watercourses in Babergh and Mid Suffolk, such as the River Gipping, the River Brett and the River Stour are associated with flood risk, and parts of the two Districts experience surface water flooding. Extreme rainfall events associated with climate change could make flood risk worse over time. The two Districts also have mineral resources of use to the construction industry, although these are not extensively worked.

Both Districts have an ageing population with 45 to 59-year olds representing the single largest age group at present, and around a quarter of residents are aged 65 years or older, partly reflecting relatively long-life expectancy. The average price of homes is around 10 times the average earnings of residents which means that for many people living in the two Districts, homes are unaffordable to buy. However, although there are a few more deprived neighbourhoods, the two Districts as a whole are in the least deprived of all Districts in England. Overall health of the population is good when compared to national averages.

The most significant occupations in the Districts are in manufacturing, wholesale and retail, accommodation and food service activities, professional scientific and technical activities, education, and human health and social work activities. There are many small and medium sized enterprises in Babergh and Mid Suffolk, rather than dominant larger employers. A high proportion of residents commute to Ipswich, Bury St Edmunds and Colchester. Around 50% more people commute out of the two Districts to work, than commute in.

## Key sustainability issues

**3.21** Schedule 2 of the SEA Regulations requires the ‘environmental report’ to describe:

(2) *“The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.*

*...and...*

(4) *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 Council Directive 79/409/EEC on the conservation of wild birds(a) and the Habitats Directive.”*

**3.22** Given the wider scope of SA, the ‘current state of the environment’ and the ‘environmental problems’ are broadened out to include social and economic issues and are described as ‘sustainability issues’ in this SA Report.

**3.23** A set of key sustainability issues for Babergh and Mid Suffolk was identified during the Scoping stage of the SA and was presented in the SA Scoping Report. **Table 3.1** describes the likely evolution of each key sustainability issue if the Joint Local Plan were not to be adopted. Note that this has been amended slightly since it was originally presented in the SA Scoping Report in response to consultation comments received on the SA Scoping Report and updates to baseline information.

**3.24** The information in **Table 3.1** shows that, in general, the current trends in relation to the various social, economic and environmental issues affecting Babergh and Mid Suffolk would be more likely to continue without the implementation of the Joint Local Plan. In addition, it is likely that policy changes and updates to housing need calculations will mean that the housing provision in the current local plans for both Districts no longer reflect local housing needs. This could result in development outside of the current local plans for both Districts and/or a lack of suitable and sustainable development. In most cases, the emerging Joint Local Plan offers opportunities to directly and strongly affect existing trends in a positive way, through an up-to-date plan that reflects the requirements of the NPPF.

### Brexit

**3.25** The UK left the European Union on 31 January 2020. A transition period is now in place until 31 December 2020. During this period, the UK complies with all EU rules and laws, and virtually nothing has changed for businesses or for the public.

**3.26** However, when the transition period has ended, the relationship with the UK and the EU will depend upon any agreement that has been reached between the two parties. At this point in time, no such agreement has been reached.

**3.27** The full social, environmental and economic impacts of Brexit (whether positive, negative or negligible), will therefore not be known until the end of the transition period and, even then, they may take many years to materialise. Therefore, the impacts of Brexit have not been factored into this SA.

### COVID-19

**3.28** On 11 March 2020, the World Health Organisation announced that they had declared the coronavirus known as COVID-19 as a global pandemic.

**3.29** The global pandemic has caused immense global disruption and suffering. The UK has been one of the worst affected countries, both in terms of people’s health and well-being, and economically.

**3.30** The effects of the pandemic in the medium to long-term, and particularly over the full extent of the JLP plan period, are unknown. Much depends upon the evolution of the virus, and society’s ability to discover effective vaccines or treatments.

**3.31** In the short-term, the impacts have been profound and possibly unprecedented for at least a century. Apart from the impacts on death rates and people’s health (particularly older members of the community, those with pre-existing conditions, and certain sectors of the population), the indirect impacts on sectors of the economy have been massive.

**3.32** From a planning perspective, the pandemic has brought to light the importance of healthy living environments, access to nature and outdoor space, the ability to exercise, and the impact of noise and pollution. There has been a significant impact on city and town centres (including ‘the high street’), as people have switched to online shopping and restrictions have been placed on restaurants, bars and other social activities. Many more people are now working from home, and much fewer people are using public transport.

**3.33** Whether these trends continue, or whether they have simply speeded up trends that were already happening, is difficult to predict. However, it has provided planners with renewed food for thought and increased emphasis on the role of town centres and the high street, the use of the car and alternative modes of transport, the need to provide for both informal and formal recreation, and the design of healthy places in which to live and work.

Table 3.1: Key sustainability issues for Babergh and Mid Suffolk and likely evolution without the Joint Local Plan

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA Objectives
Population, Health and Wellbeing		
<p>BMSDC has an ageing population, which has the potential to result in pressure on the capacity of local services and facilities, such as GP surgeries and hospitals. An ageing population also requires a mixture of housing that will meet the needs of older people, whilst also freeing up houses for younger residents. Current housing stock is predominantly old and inefficient to heat, and therefore unsuitable.</p>	<p>Policy CS21 (Infrastructure Provision) in Babergh's Core Strategy (2014) seeks to protect, safeguard and enhance existing services, facilities and amenities to support members of the community. For Core and Hinterland Villages, Policy CS11 (Strategy for Development for Core and Hinterland Villages) states that new retail, leisure and community uses appropriate to the area, will be encouraged. Additionally, Policy CS16 (Town, Village and Local Centres) promotes service provision in Sudbury and Hadleigh, as well as village and local centres. With regard to housing, Policy CS18 (Mix and Types of Dwellings) seeks to provide residential development that particularly meets the needs of older people, whilst Policy CS12 (Sustainable Design and Construction Standards) states that large scale residential developments will be expected to achieve the Building for Life Silver Standard.</p> <p>In Mid Suffolk's Core Strategy (2008), Policy CS6 (Services and Infrastructure) states that new development will be expected to provide or support the delivery of appropriate and accessible infrastructure to meet the justifiable needs of new development. It specifically states that local priorities for which infrastructure contributions may be sought include healthcare, social and community facilities, village services and facilities, community safety and improvements to public transport. In relation to housing, Policy CS9 encourages the provision of a mix of house types, sizes and affordability.</p> <p>Without the JLP, services would likely still be retained and provided during the current plan period of both areas. Babergh's most up-to-date document in the Local Plan, the Core Strategy, covers the period up to 2031, whilst Mid Suffolk's Core Strategy covers the period up to 2026. With the existing Local Plan, a mixture of housing may not be achieved and designed to be energy efficient. The JLP offers an opportunity to deliver the required services and facilities in a coherent, sustainable manner alongside new development that keeps pace with demand, whilst also requiring certain standards of energy efficiency to be achieved.</p>	<p>SA Objectives 1, 3, 4.</p>
<p>There is an acute need for affordable housing in BMSDC because at present, the mean price of dwellings is higher than the national average and for Babergh, is also higher than the regional average. The proportion of new homes that are affordable are below targets.</p>	<p>Policy CS19 (Affordable Homes) in Babergh's Core Strategy (2014) requires the provision of 35% affordable housing in new developments. Where a development is for one or two dwellings and affordable homes cannot be provided on site, a commuted sum will be required. Policy CS18 (Mix and Types of Dwellings) states that the mix, type and size of housing developments will be expected to reflect established needs in Babergh District.</p> <p>Policy CS9 (Density and Mix) in Mid Suffolk's Core Strategy (2008) states that new housing development should provide a mix of house types, sizes and affordability to cater for different accommodation needs. More specifically, Altered Policy H4 (A Proportion of Affordable Housing in New Housing Developments) contained within the First Alteration to the Mid Suffolk Local Plan (2006) requires the provision of 35% affordable housing as follows:</p> <ul style="list-style-type: none"> <li>■ sites of 15 dwellings or more or sites of 0.5 hectares and above, in Stowmarket and Needham Market;</li> <li>■ sites of 5 dwellings or more or sites of 0.17 hectares and above, in the remainder of Mid Suffolk.</li> </ul> <p>On rural exception sites, Altered Policy H5 (Affordable Housing on Rural Exception Sites) states that permission may be granted for development as an exception to normal planning policy.</p> <p>Without the JLP, provision would continue to be made for affordable housing over the existing plan periods. However, house prices would respond to changes in the housing market and over the long-term, would most likely rise. The JLP provides an opportunity to facilitate and expedite the delivery of affordable housing, whilst also supporting the provision of a more appropriate mix of new homes to meet the needs of a growing population.</p>	<p>SA Objective 4.</p>
<p>There are a number of vulnerable people, including people with learning</p>	<p>In Babergh's Core Strategy (2014), Policy CS18 requires a mix of housing that reflects established needs in the District. However, the policy does not specifically require the delivery of specialist housing. Despite this, Saved Policy HS39 (Special</p>	<p>SA Objective 4.</p>

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA Objectives
<p>difficulties, who have specialist housing needs (defined as sheltered, extra care, residential care or nursing care).</p>	<p>Needs Housing) in Babergh's Local Plan Alteration No. 2 encourages planning applications for nursing, residential care, rest homes and sheltered housing.</p> <p>In Mid Suffolk's Core Strategy (2012), Policy CS9 requires new housing developments to cater for different accommodation needs. However, as was the case with Babergh's Core Strategy, it does not specifically require the delivery of specialist housing. Despite this, Saved Policy H19 (Accommodation for special family needs) in the Mid Suffolk Local Plan (1998) encourages development for specialist needs.</p> <p>Without the JLP, it is likely that specialist housing would still be provided. However, the JLP provides an opportunity to specify how much specialist housing is needed and to place more of a requirement on developers to provide specialist housing.</p>	
<p>There are high percentages of residents within Babergh District and Mid Suffolk District who live in rural areas, comprising 69% of Babergh's population and 75% of Mid Suffolk's population. Villages and rural areas tend to have less in the way of jobs, services and facilities than the market towns, and continue to lose services and facilities (e.g. shops and pubs).</p>	<p>In Babergh's Core Strategy (2014), Policy CS2 (Settlement Pattern Policy) only permits development in the countryside in exceptional circumstances subject to a proven justifiable need. Likewise, Policy CS3 (Strategy for Growth and Development) only encourages development within the town/urban areas, Core and Hinterland Villages, as defined in the Settlement Hierarchy. Policy CS11 (Strategy for Development for Core and Hinterland Villages) sets out how development will be delivered in both the Core and Hinterland Villages. Policy CS20 (Rural Exception Sites) allows for development in more rural areas, as long as it is adjacent or well related to settlement development boundaries. Additionally, Policy CS17 (The Rural Economy) seeks to support the rural economy. Further to this, the Core Strategy encourages sustainable development through Policy CS15 (Implementing Sustainable Development in Babergh). Saved Policies SP05 (Farm Shops) and CR13 (Removal of Agricultural Occupancy Restrictions) in the Local Plan Alteration No. 2 document are also relevant.</p> <p>In Mid Suffolk's Core Strategy (2008), Policy CS1 (Settlement Hierarchy) states that the majority of development will be directed to towns and key service centres and in some cases, villages. However, development in the countryside will be restricted to particular types of development to support the rural economy, meet affordable housing and community need, and provide renewable energy. Policy CS2 (Development in the Countryside and Countryside Villages) sets out what development will be permitted within rural areas. Saved Policies H3 (Housing development in villages), H7 (Restricting housing development unrelated to needs of countryside), H8 (Replacement dwellings in the countryside), H9 (Conversion of rural buildings to dwellings), H10 (Dwellings for key agricultural workers), E10 (New Industrial and commercial development in the countryside), E11 (Re-use and adaption of agricultural and other rural buildings) in the Mid Suffolk Local Plan (1998) are also relevant.</p> <p>Without the JLP, it is likely that people would still continue to live in rural areas. The existing Local Plans for both Districts ensure that the rural economy is supported, whilst also directing development to more sustainable, urban locations in the existing plan period<sup>6</sup>. The new JLP provides an opportunity to ensure that those living within rural areas are supported by infrastructure, services and facilities, although it will continue to be a challenge to do so compared with more urban locations, due to lack of viability.</p>	<p>SA Objectives 1, 3 and 14.</p>
<p>The number of people who have a Level 4 qualification (Degree, Higher Degree, NWQ Level 4-5, Higher National Certificate and Higher National Diploma) and above is lower than the national average, and although the number of people with no qualifications is equal to the national average at 25%, this could be improved.</p>	<p>Babergh's Local Plan does not contain a policy relating to education and school provision as this tends to be achieved through the delivery of schools as part of large strategic sites.</p> <p>Policy CS6 (Services and Infrastructure) in Mid Suffolk's Core Strategy (2008) states that new development will be expected to provide or support the delivery of appropriate and accessible infrastructure to meet the justifiable needs of new development. Infrastructure contributions will be sought for education, libraries and social and community facilities. Saved Policy SC8 (Siting of new school buildings) in the Mid Suffolk Local Plan (1998) are also relevant.</p> <p>Without the JLP, schools may not be delivered to meet growing needs. The JLP offers an opportunity to ensure that large development sites make provision for a</p>	<p>SA Objective 2.</p>

<sup>6</sup> Babergh's most up-to-date document in the Local Plan, the Core Strategy, covers the period up to 2031, whilst Mid Suffolk's Core Strategy covers the period up to 2026.

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA Objectives
	new educational facility, as well as ensuring that growing educational needs are also met in other ways (e.g. the provision of a library).	
Although BMSDC is not generally deprived, pockets of deprivation exist across the area, with some rural areas being particularly deprived in terms of access.	<p>Policies CS19 (Affordable Homes) and CS18 (Mix and Types of Dwellings) in Babergh's Core Strategy seek to address the issue of access to affordable housing, whilst policies CS21 (Infrastructure Provision), CS11 (Strategy for Development for Core and Hinterland Villages) and CS16 (Town, Village and Local Centres) in Babergh's Core Strategy (2014) support the provision of services, facilities and amenities (e.g. healthcare). The delivery of housing, in addition to services, will be achieved through high quality and sustainable design, as set out in Policy CS12 (Sustainable Design and Construction Standards). Similarly, Saved Policies CN01 (Design Standards) and CN04 (Design &amp; Crime Prevention) in the Babergh Local Plan Alteration No. 2 (2006) require all new development proposals to be of appropriate scale and form, and for construction materials to be from the location of development. This will help ensure high quality design standards across the District.</p> <p>Policy CS9 (Density and Mix) in Mid Suffolk's Core Strategy (2008) and Amended Policies H4 (A Proportion of Affordable Housing in New Housing Developments) and H5 (Affordable Housing on Rural Exception Sites) in the First Alteration to the Mid Suffolk Local Plan (2006) seek to deliver affordable housing, whilst Policy CS6 seeks to deliver infrastructure across the District. These will be high quality in design and help address poorer living standards across the District, in line with Policy CS5 in the Core Strategy (Mid Suffolk's Environment). Saved Policies GP1 (Design and layout of development), H13 (Design and layout of housing development), E12 (General principles for location, design and layout) and T12 (Designing for people with disabilities) from the Mid Suffolk Local Plan (1998) will also help achieve good design.</p> <p>Without the JLP, the aforementioned policies would continue to apply. However, the JLP presents an opportunity address deprivation more head on by ensuring that all indicators of disparity such as access to housing, income deprivation, health deprivation, employment deprivation, living environment deprivation and education skills deprivation are all addressed. The JLP will allow for changing circumstances in BMSDC to be more appropriately addressed.</p>	SA Objectives 1, 2, 3 and 14.
BMSDC is a relatively safe area in which to live. In recent years however certain types of crime such as burglary, criminal damage and arson, drugs, theft and weapons possession have increased.	<p>Policy CS16 (Town, Village and Local Centres) in Babergh's Core Strategy (2014) states that new retail, leisure and similar service uses, will be assessed for potential impact, including cumulative impact, on crime, including considering security issues raised by crowded places. Likewise, Policy CN04 (Design &amp; Crime Prevention) in the Babergh Local Plan Alteration No. 2 (2006) ensures that development provides for public safety and deters vandalism and crime.</p> <p>Saved Policy GP1 (Design and Layout of Development) in the Mid Suffolk Local Plan (1998) states that development must give consideration to the interrelationship between buildings and open spaces so as to minimise opportunities for criminal activity, consistent with good layout and architectural design.</p> <p>Without the JLP, it is likely that crime would continue to take place. The JLP provides an opportunity to set out more detailed design guidance to 'design out' opportunities for crime, such as promoting active frontages to ensure 'eyes on the street'.</p>	SA Objectives 1 and 3.
The provision of green space varies across BMSDC, with a deficiency in parks and recreation grounds identified and an identified need for improved open space, play and outdoor recreational facilities.	<p>Policy CS14 (Green Infrastructure) in Babergh's Core Strategy (2014) states that existing green infrastructure will be protected and enhanced, and that green infrastructure will be a key consideration on large development sites. Saved Policy CN03 (Open Space within Settlements) in Babergh's Local Plan Alteration No. 2 (2006) states that development resulting in a loss of important open space, will not be permitted.</p> <p>Policy CS6 (Services and Infrastructure) in Mid Suffolk's Core Strategy (2008) states that new development will be expected to provide or support the delivery of infrastructure, including open space and green infrastructure. Saved Policy SB3 (Retaining visually important open spaces) in the Mid Suffolk Local Plan (1998) safeguards open space, whilst Saved Policy GP1 (Design and layout of development) encourages the creation of open spaces between existing and proposed buildings.</p> <p>Without the JLP, there is potential for the quality of open spaces to deteriorate, whilst access to open space will remain limited. The JLP offers the opportunity to better</p>	SA Objective 1.

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA Objectives
	address the changing circumstances in the plan area by ensuring the protection and enhancement of access to and quality of open space. The process will also allow for new open green spaces to be planned and incorporated alongside new development.	
Economy		
There are a number of barriers to economic growth within BMSDC, including educational attainment and a lack of suitable premises for SMEs.	<p>Policy CS3 (Strategy for Growth and Development) in Babergh's Core Strategy (2014) states that 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 regularly reviewed and where appropriate, protected. A small number of sites are also allocated for employment development in the Core Strategy. Saved Policies EM02 (General Employment Areas – Existing and New allocations), EM08 (Warehousing &amp; Distribution), SD01 (Principal Shopping Area), SD02 (Mixed Use Areas – Business &amp; Service), SD03 (Mixed Use Areas – Shopping &amp; Commerce), SD11 (Industrial Areas) in the Babergh Local Plan Alteration No. 2 (2006) are also relevant.</p> <p>Policy FC3 in Mid Suffolk's Core Strategy Focused Review (2012) document states that provision will be made for development that aims to deliver at least 8,000 additional jobs in the District by 2026 and an indicative 11,100 jobs by 2031. To help meet this target and contribute to an overall package of sustainable development for Stowmarket, a new site will be allocated in Stowmarket at Mill Lane. Saved Policies E1-E10, S1-S3, S6-S7 and S10-S13 in the Mid Suffolk Local Plan (1998) are also relevant.</p> <p>Without the JLP, it is uncertain how the job market might change but to some degree, change is inevitable given the UK's exit from the EU. The new Joint Local Plan offers the opportunity to create and safeguard jobs through the allocation and promotion of employment generating uses including office and industrial spaces and the promotion of the rural economy, as well as promoting access and opportunity for all.</p>	SA Objectives 1, 2, 14 and 15.
There has been a decline in shopping consumer patterns, with a number of vacant units present in key towns and service centres.	<p>Policy CS16 (Town, Village and Local Centres) in Babergh's Core Strategy (2014) states that retail development will continue to be focussed in Sudbury and Hadleigh, and in village and local centres where appropriate. More specifically, the Council will make provision for up to 11,000 square metres of comparison retail goods in 2021 in Sudbury. Saved Policy SD03 (Mixed Use Areas – Shopping &amp; Commerce) in the Babergh Local Plan Alteration No. 2 (2006) is also relevant.</p> <p>Saved Policies S1 (Supporting the role of existing town centres), S2 (Uses appropriate to principal shopping areas) and S3 (Amusement Centres) in the Mid Suffolk Local Plan (1998) are relevant. However, the Core Strategy (2008) does not contain a policy for retail development.</p> <p>Without the JLP, vacancy rates in the key towns and service centres may continue to increase. However, the number of vacant units is partly due to the increase in online sales, which is a nationally significant change in shopping behaviours. The JLP presents an opportunity to protect and promote the High Street in the key towns and service centres.</p>	SA Objectives 14 and 15.
Babergh is not identified as a known destination for business growth, partly because of its geographical location between Ipswich, Colchester and Bury St Edmunds.	<p>Babergh's Core Strategy (2014) allocates a small number of sites for employment development and also states that existing employment sites will be regularly reviewed and where appropriate, protected. Saved Policies EM01 (General Employment), EM02 (General Employment Areas – Existing and New allocations), EM08 (Warehousing &amp; Distribution), SD01 (Principal Shopping Area), SD02 (Mixed Use Areas – Business &amp; Service), SD03 (Mixed Use Areas – Shopping &amp; Commerce), SD11 (Industrial Areas) in the Babergh Local Plan Alteration No. 2 (2006) are also relevant.</p> <p>Policy FC3 in Mid Suffolk's Core Strategy Focused Review (2012) makes provision for significant employment development and to help meet this target, a new site will be allocated in Stowmarket at Mill Lane. Saved Policies E1-E10, S1-S3, S6-S7 and S10-S13 in the Mid Suffolk Local Plan (1998) are also relevant.</p> <p>Without the JLP, it is likely that Babergh will continue to not be identified as a destination for business growth. The new JLP presents an opportunity to develop</p>	SA Objectives 14 and 15.

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA Objectives
	Babergh's reputation as a business growth destination and provide employment development where needed, although it will continue to face competition from other areas with more established reputations, networks and infrastructure.	
There is an uneven distribution of services throughout BMSDC and limited infrastructure in place to support economic development.	<p>Babergh's Core Strategy (2014) allocates a small number of sites for employment development and also states that existing employment sites will be regularly reviewed and where appropriate, protected. With regard to infrastructure, Policy CS21 (Infrastructure Provision) states that the District will develop sustainable places in the District and proposals for commercial development will be supported by, and make adequate provision for, appropriate infrastructure. Saved Policies EM02 (General Employment Areas – Existing and New allocations), EM08 (Warehousing &amp; Distribution), SD01 (Principal Shopping Area), SD02 (Mixed Use Areas – Business &amp; Service), SD03 (Mixed Use Areas – Shopping &amp; Commerce), SD11 (Industrial Areas) in the Babergh Local Plan Alteration No. 2 (2006) are also relevant.</p> <p>Policy FC3 in Mid Suffolk's Core Strategy Focused Review (2012) makes provision for significant employment development and to help meet this target, a new site will be allocated in Stowmarket at Mill Lane. The policy states that major new allocations of employment land should be situated primarily in or close to towns and Key Service Centres with good access to the District's major transport routes and good access by public transport. Saved Policies E1-E10, S1-S3, S6-S7 and S10-S13 in the Mid Suffolk Local Plan (1998) are also relevant.</p> <p>Without the JLP, limited additional infrastructure to support economic development will be in place. The new JLP offers an opportunity to address infrastructure issues across BMSDC and therefore to support economic development.</p>	SA Objectives 2, 14, 15 and 16.
Transport, Air Quality and Noise		
Both Babergh and Mid Suffolk benefit from some form of public transport provision. However, due to the Districts being predominantly rural, a lot of residents are dependent on the private car. This prevents both areas from achieving a modal shift towards more sustainable modes of transport.	<p>Policy CS21 (Infrastructure Provision) in Babergh's Core Strategy (2014) states that all proposals for housing and commercial development will be required to be supported by, and make provision for, appropriate infrastructure. Saved Policies TP04-TP19 in the Babergh Local Plan Alteration No. 2 (2006) are also relevant.</p> <p>Policy CS6 (Services and Infrastructure) in Mid Suffolk's Core Strategy (2008) states that new development will be expected to provide or support the delivery of appropriate and accessible infrastructure to meet the justifiable needs of new development. Local priorities for which infrastructure contributions may be sought include transport infrastructure, improvements in public transport and improvements to pedestrian and cycle routes. Saved Policies T2-T14 in the Mid Suffolk Local Plan (1998) are also relevant.</p> <p>Without the JLP, it is likely that dependence on the private car will continue, especially as a result of cuts to public transport. This could have an adverse effect on congestion and air quality. The JLP presents an opportunity to further address the issue of car dependency, especially through joint working in the Ipswich Strategic Planning Area. This can be achieved by promoting sustainable and active transport, sustainable development locations, and integrating new and more sustainable technologies, as new development is to be provided in BMSDC.</p>	SA Objectives 6 and 16.
Capacity issues have been identified at various junctions within BMSDC and although highway schemes to help mitigate congestion are set for implementation, capacity issues in other places will endure.	<p>Policy CS21 (Infrastructure Provision) in Babergh's Core Strategy (2014) states that all proposals for housing and commercial development will be required to be supported by, and make provision for, appropriate infrastructure. Saved Policies TP01-TP19 in the Babergh Local Plan Alteration No. 2 (2006) are also relevant.</p> <p>Policy CS6 (Services and Infrastructure) in Mid Suffolk's Core Strategy (2008) states that new development will be expected to provide or support the delivery of appropriate and accessible infrastructure to meet the justifiable needs of new development. Local priorities for which infrastructure contributions may be sought include transport infrastructure, improvements in public transport and improvements to pedestrian and cycle routes. Saved Policies T04-T14 in the Mid Suffolk Local Plan (1998) are also relevant.</p> <p>Suffolk's Local Transport Plan 2011-2031 (Part 2 – Implementation Plan) sets out a number of schemes coming forward to address highway issues across the county and within BMSDC.</p>	SA Objectives 6 and 16.

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA Objectives
	<p>Without the JLP, there is still potential for congestion to continue to be an issue in BMSDC, particularly given that the growing population is likely to exacerbate this issue. Although, the Local Transport Plan seeks to address congestion issues, the JLP presents the opportunity to address this by providing further clarity for infrastructure providers and also to strengthen policy to promote the use of alternative modes of transport. It also has the potential to direct new development to the most sustainable locations so as to minimise the need to travel by private vehicle on the local network. This approach can be used to complement measures taken by the Highways Authority to combat congestion on the strategic road network.</p>	
<p>BMSDC has one Air Quality Management Area (AQMA), which covers part of Cross Street in Sudbury, and there are five AQMAs designated in neighbouring Ipswich Borough and West Suffolk (in and close to Bury St Edmunds). Additional development within BMSDC has potential to exacerbate air quality issues at these AQMA. Similarly, there is potential for a cumulative impact of development in neighbouring authorities alongside development in BMSDC in terms of air quality.</p>	<p>Babergh's Core Strategy (2014) does not contain a specific policy on air quality but does promote the provision of infrastructure (e.g. footpaths and cycle routes) through Policy CS21 (Infrastructure Provision). Likewise, Mid Suffolk's Core Strategy (2008) does not contain an air quality policy but encourages more environmentally friendly modes of transport through Policy CS6 (Services and Infrastructure).</p> <p>Without the JLP, development may be located in less sustainable locations that increase reliance on car use, which is likely to increase air pollution. Recent national policies and the emergence of new technologies are likely to improve air quality, for example, through cleaner fuels/energy sources. Nonetheless, the JLP provides an opportunity to contribute to improved air quality in BMSDC through the sustainable siting of development and the promotion of alternative travel modes to the motorised vehicle, in line with national policy aspirations.</p>	<p>SA Objectives 13 and 16.</p>
Land and Water Resources		
<p>BMSDC contains safeguarded mineral resources which, where possible, should not be lost or compromised by future growth.</p>	<p>Babergh's Core Strategy (2014) contains text encouraging the re-use of brownfield land. This is beneficial as it will limit the amount of development on land that could be used for minerals extraction in the future. The Local Plan Alteration No. 2 (2006) does not contain a policy on brownfield land and neither does Mid Suffolk's Core Strategy (2008) and Local Plan (1998).</p> <p>Without the JLP, it is possible that development could result in unnecessary sterilisation of mineral resources which would mean they are not available for future generations to use. The JLP provides an opportunity to promote development on brownfield land, in addition to the safeguarding of minerals resources.</p>	<p>SA Objective 7.</p>
<p>The majority of BMSDC comprises best and most versatile agricultural land with a mix of classified agricultural land (Grades 1, 2, and 3). New development should, where possible, be delivered as to avoid the loss of higher grades of agricultural land.</p>	<p>Babergh's Core Strategy (2014) and Local Plan Alteration No. 2 (2006) do not contain a policy on best and most versatile agricultural land. However, the National Planning Policy Framework (NPPF) supports the reuse of brownfield land and states that planning policies and decisions should contribute to and enhance the natural and local environment by "recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land"</p> <p>Policy CS8 (Brown Field Target) in Mid Suffolk's Core Strategy (2008) does not contain a policy on agricultural land but states that the District Council has a target of 50% of dwellings to be built on brownfield/previously developed land in Mid Suffolk. However, Saved Policy CL11 (Retaining high quality agricultural land) in the Local Plan (1998) encourages the conservation of agricultural land, particularly the best and most versatile agricultural land.</p> <p>Without the JLP, it is likely that development would, in some instances, take place on the best and most versatile agricultural land. The JLP provides an opportunity to strengthen the approach and ensure these natural assets are not lost or compromised. This may involve the prioritisation of use of brownfield sites and lower quality agricultural land for development.</p>	<p>SA Objectives 7 and 11.</p>
<p>Due to Babergh and Mid Suffolk having numerous rivers running through their</p>	<p>Policy CS15 (Implementing Sustainable Development in Babergh) in Babergh's Core Strategy (2014) seeks to ensure that there is no deterioration of the status of the water environment in terms of water quality, water quantity and physical</p>	<p>SA Objective 5.</p>

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA Objectives
<p>areas (e.g. the River Gipping and River Brett), there is a need to ensure that not only the rivers are protected but that all water sources including groundwater are too. Many areas in BMSDC are covered by Source Protection Zones.</p>	<p>characteristics. Mid Suffolk's Core Strategy (2008) and Local Plan (1998) do not contain a policy on this.</p>	
<p>Anglian Water provides for Babergh District, whilst Essex and Suffolk Water provides for Mid Suffolk – both of which are prone to drought. Due to water being imported from elsewhere in the country, there must be effective and reliable water systems in place to reduce any harm associated with droughts. The likelihood of droughts may increase as a result of climate change, and it should be noted that there is significant cross-over between water resource availability and water quality.</p>	<p>Policy CS15 (Implementing Sustainable Development in Babergh) in Babergh's Core Strategy (2014) seeks to ensure that there is no deterioration of the status of the water environment in terms of water quality, water quantity and physical characteristics. Mid Suffolk's Core Strategy (2008) and Local Plan (1998) do not contain a policy on this.</p> <p>Without the JLP, it is possible that development could be located in areas that will exacerbate the water stress issue. The JLP has the potential to secure long term sustainable development, which will be essential in ensuring that all new development implements water efficiency standards, and that the phasing of new development is in line with any implementation timescales for any new strategic schemes that water companies might require.</p>	<p>SA Objectives 5 and 9.</p>
<p>A growing population and an increase in development will place pressure on wastewater treatment works (WwTWs). Seven WwTWs have been identified as not having available capacity to meet these needs.</p>	<p>Policy CS15 (Implementing Sustainable Development in Babergh) in Babergh's Core Strategy (2014) states that development will be required to minimise wastewater during construction, and promote and provide for the reduction, re-use and recycling of all types of waste from the completed development. There are no policies on wastewater in Mid Suffolk's existing Local Plan. Without the JLP, it is likely that capacity for wastewater treatment will develop as Suffolk County Council is responsible for its provision. However, the JLP provides an opportunity to encourage the minimisation of wastewater during construction and the operation of buildings.</p>	<p>SA Objective 5.</p>
<p>A growing population will place increased pressure on waste management facilities and there will be a requirement to meet these growing needs.</p>	<p>Policy CS6 in Mid Suffolk's Core Strategy (2008) states that new development will be expected to provide or support the delivery of appropriate infrastructure, including waste minimisation and recycling initiatives. Policy CS2 (Development in the Countryside and Countryside Villages) requires the provision of waste management facilities in the Countryside and Countryside Villages. Lastly, Policy CS3 (Reduce contributions to Climate Change) states that adequate provision will be made for the separation and storage of waste for recycling. There are no policies on waste in Babergh's existing Local Plan. Without the JLP, it is likely that waste management provision would continue as Suffolk County Council is responsible for its provision. However, the JLP still provides an opportunity to promote waste minimisation and recycling initiatives.</p>	<p>SA Objective 8.</p>
<p>Climate Change Adaptation and Mitigation</p>		
<p>While carbon emissions from all sectors have fallen in both districts since 2005, BMSDC's emissions are still above the national and regional averages. There has also been very little progress on transport emissions. Both Councils have committed to meeting net zero by 2030 at the latest, and to meet this will need to make significant shifts in energy efficiency of new and existing buildings,</p>	<p>Policy CS12 (Sustainable Design and Construction Standards) in Babergh's Core Strategy (2014) states that larger scale residential developments will be expected to achieve the Building For Life Silver Standard, whilst non-residential developments are expected to achieve a minimum BREEAM standard of 'Excellent'. Policy CS13 (Renewable/Low Carbon Energy) also requires new development to minimise dependence on fossil fuels and make the fullest contribution to the mitigation of climate change through adopting a sustainable approach to energy use. Large-scale development proposals will be required to use on-site renewable, decentralised, or low carbon energy sources with the aim of achieving a 10% reduction in the predicted carbon dioxide emissions of the development. Likewise, Policy CS15 (Implementing Sustainable Development in Babergh) expects development to address climate change through design, adaptation, mitigation and by incorporating or producing sources of renewable or low-carbon energy. With regard to transport,</p>	<p>SA Objectives 9 and 16.</p>

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA Objectives
transport trends, and the further deployment of a range of renewables infrastructure.	<p>Saved Policies TP04-TP19 in the Babergh Local Plan Alteration No. 2 (2006) are relevant.</p> <p>Policy CS2 (Reduce Contributions to Climate Change) in Mid Suffolk's Core Strategy (2008) states that the Council will promote and encourage the appropriate development of standalone Renewable Energy schemes, in addition to sustainable construction techniques. With regard to transport, Policy CS6 (Services and Infrastructure) states that local contributions for which infrastructure contributions may be sought include improvements in public transport and improvements to pedestrian and cycle routes.</p> <p>Without the JLP, sustainable design and renewable energy schemes would continue to be implemented in the existing plan period. Babergh's most up-to-date document in the Local Plan, the Core Strategy, covers the period up to 2031, whilst Mid Suffolk's Core Strategy covers the period up to 2026. The JLP provides an opportunity to strengthen policies which act positively in terms of climate change, especially those that limit the need to travel through the appropriate siting and design of new development or which encourage electric vehicle uptake in place of petrol and diesel fuelled vehicles, and which make provision for renewable energy generation.</p>	
The effects of climate change in BMSDC is likely to result in extreme weather events (e.g. intense rainfall, prolonged high temperatures and drought) becoming more common and more intense.	<p>Policy CS12 (Sustainable Design and Construction Standards) in Babergh's Core Strategy (2014) and Policy CS2 (Reduce Contributions to Climate Change) in Mid Suffolk's Core Strategy (2008) require new development to adapt to climate change through sustainable design and construction techniques. Policy CS15 (Implementing Sustainable Development in Babergh) in Babergh's Core Strategy also states that development should mitigate the impacts of climate change, such as enhancing natural cooling to reduce the heat island effect, providing pollution sequestration for the absorption of greenhouse gases and the implementation of sustainable drainage systems (SUDs).</p> <p>Without the JLP, extreme weather effects will still take place. However, the JLP provides an opportunity to build upon the approach of current policy to better respond to developing circumstances as evidence and techniques develop.</p>	SA Objective 9.
BMSDC will need to become more resilient to the increased risk of flooding as a result of climate change.	<p>Policy CS15 (Implementing Sustainable Development in Babergh) in Babergh's Core Strategy (2014) encourages the provision of flood water storage areas and sustainable drainage systems.</p> <p>Policy CS4 (Adapting to Climate Change) states that the Council will support development proposals that avoid areas of current and future flood risk, and which do not increase flooding elsewhere, adopting a precautionary principle to development proposals. Saved Policies CL4 (Protecting the river valleys and flood plains) and SC5 (Areas at risk of flooding) are also relevant.</p> <p>Without the emerging JLP, flooding will still take place but it is likely that development will continue to be located away from areas at high risk of flooding. The JLP provides an opportunity, alongside national measures, to mitigate the effects of potential future flooding through appropriate siting of development and flood resilient design.</p>	SA Objectives 9 and 10.
<b>Biodiversity</b>		
BMSDC contains and is in close proximity to a number of both designated and non-designated natural habitats and biodiversity. This includes those designated for their national and international importance. Not all SSSIs are in favourable condition.	<p>Policy CS14 (Green Infrastructure) in Babergh's Core Strategy (2014) seeks to protect and enhance green infrastructure, whilst Policy CS15 (Implementing Sustainable Development) states that development must protect and enhance biodiversity and create open, green spaces where appropriate.</p> <p>Policy CS5 (Mid Suffolk's Environment in Mid Suffolk's Core Strategy (2008) states that development must protect, manage and enhance Mid Suffolk's biodiversity and geodiversity and where appropriate increase opportunities for access and appreciation of biodiversity. Saved Policies CL5-C11 in Mid Suffolk's Local Plan (1998) are also relevant.</p> <p>Without the JLP, pressures on biodiversity assets is likely to continue due to ongoing pressure for further development and growth. The JLP presents an opportunity for new development to come forward at the most appropriate locations in order to avoid</p>	SA Objective 11.

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA Objectives
	detrimental impacts on biodiversity assets, as well as up to date planning policy in relation to future policy direction such as biodiversity net gain.	
<p>Although designated sites represent the most valued habitats in the plan area, the overall ecological network is also important for biodiversity as a whole and helps to support the health of designated sites, allowing species to migrate in response to climate change. The fragmentation and erosion of habitats and the wider ecological network in BMSDC is an ongoing threat to biodiversity.</p>	<p>Policy CS14 (Green Infrastructure) in Babergh's Core Strategy (2014) seeks to protect and enhance green infrastructure, whilst Policy CS15 (Implementing Sustainable Development) states that development must protect and enhance biodiversity and create open, green spaces where appropriate.</p> <p>Policy CS5 (Mid Suffolk's Environment in Mid Suffolk's Core Strategy (2008) states that development must protect, manage and enhance Mid Suffolk's biodiversity and geodiversity and where appropriate increase opportunities for access and appreciation of biodiversity. Saved Policies CL5-C11 in Mid Suffolk's Local Plan (1998) are also relevant.</p> <p>Without the JLP, erosion and fragmentation of habitats and ecological networks could take place through poorly located and designed development. The NPPF requires Local Plans to include policies to safeguard, restore and create ecological networks at a landscape scale. The JLP provides the opportunity to further promote biodiversity gain and to improve the overall ecological network.</p>	SA Objective 11.
Historic Environment		
<p>There are many sites, features and areas of historical and cultural interest in the plan area, a number of which are identified on the Heritage at Risk register. In the context of significant ongoing pressures for development locally, these assets, and their landscape setting, may be at risk from adverse effects from poorly located or designed development.</p>	<p>Policy CS11 (Strategy for Development for Core and Hinterland Villages) in Babergh's Core Strategy (2014) states that development in Core and Hinterland Villages will be approved where appropriate to the landscape, environmental and heritage characteristics of the village. Likewise, Policy CS15 (Implementing Sustainable Development in Babergh) states that development must respect heritage assets, important spaces and historic views. Saved Policies CN06-CN15 in the Babergh Local Plan Alteration No. 2 (2006) are relevant.</p> <p>Policy CS5 (Mid Suffolk's Environment) in Mid Suffolk's Core Strategy (2008) requires development to respect the local distinctiveness and the built heritage of Mid Suffolk. Saved Policies HB1-HB14 in Mid Suffolk's Local Plan (1998) are also relevant.</p> <p>Without the JLP, it is possible that heritage assets within both Districts will be adversely affected by inappropriate development. This is because the JLP will be developed on the basis of a different baseline of expected growth, which may put these assets (including their setting) under increased pressure. The JLP offers an opportunity to limit development in more historically sensitive areas and to ensure that development does not result in adverse effects on the historic environment.</p>	SA Objective 12.
Landscape		
<p>The plan area contains two AONBs and a diverse range of nationally recognised landscape character areas, all of which could be significantly harmed by inappropriate development. As well as loss of undeveloped land to development, indirect effects of development can also erode landscape character, such as noise and light pollution, recreational pressure, changes to the water environment, and pressure on habitats and biodiversity and the historic environment that contribute to landscape character.</p>	<p>Policy CS15 (Implementing Sustainable Development in Babergh) states that development should, where appropriate, respect the landscape and landscape features, whilst also making a positive contribution to the local character, shape and scale of the area. Saved Policies CR01 (Landscaping Quality), CR02 (AONB Landscape), CR04 (Special Landscape Areas), CR07 (Landscaping Schemes) and CR08 (Hedgerows) in the Babergh Local Plan Alteration No. 2 (2006) are also relevant.</p> <p>Policy CS5 (Mid Suffolk's Environment) in Mid Suffolk's Core Strategy (2008) requires all development to protect and conserve landscape qualities taking into account the natural environment and the historical dimension of the landscape as a whole rather than concentrating solely on selected areas. Saved Policy CL2 (Development within special landscape areas) in Mid Suffolk's Local Plan (1998) is also relevant.</p> <p>Without the JLP, it is likely that development could have an adverse effect on the landscape in both Districts. The JLP provides an opportunity to update the current policy position in response to the ongoing evolution of development pressures and their impact on the landscape in BMSDC.</p>	SA Objective 13.

## **Chapter 4**

### **Summary of Previous Sustainability Appraisal Work Undertaken**

The SA process has been going on for over three years alongside the preparation of the Joint Local Plan. This chapter describes the earlier SA work which has helped to shape the Plan.

#### **Background to the Joint Local Plan preparation process**

**4.1** BMSDC commenced preparation of the JLP in 2016. To date, there have been two rounds of Regulation 18<sup>7</sup> consultation on the JLP:

- Publication of a Consultation Document in August 2017
- Publication of a Preferred Options Document in July 2019.

#### **Consultation Document (August 2017)**

**4.2** BMSDC produced a JLP Consultation Document (Regulation 18) in August 2017, which identified the issues, put forward options and, in some instances, indicated an initial preference for what and where development should take place up to 2036<sup>8</sup>.

#### **Preferred Options Document (July 2019)**

**4.3** In July 2019, BMSDC produced a Preferred Options version of the JLP (also Regulation 18). This set out in detail the preferred spatial strategy of BMSDC to be included in the JLP, and the preferred strategic and non-strategic policies, including site allocations. It should be noted that the 'preferred options' were those that BMSDC were minded to pursue at that point in time, subject to consultation responses and further evidence base collection, including the findings of the on-going SA work.

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<sup>7</sup> The Town and Country Planning (Local Planning) (England) Regulations 2012 (SI 2012 No. 767).

<sup>8</sup> The plan period has since been changed to 2037.

4.4 SA work has been undertaken at each stage of the JLP preparation process as described below.

### First stage of SA work

4.5 The first stage of SA work was undertaken internally by BMSDC officers. It resulted in the following outputs.

#### SA Scoping Report (2017)

4.6 BMSDC prepared a joint SA Scoping Report in January 2017. This was produced internally by the two Councils and consulted upon with the statutory consultation bodies (Environment Agency, Historic England and Natural England).

#### Regulation 18 Consultation Document SA (August 2017)

4.7 BMSDC carried out an internal SA of the Regulation 18 JLP Consultation Document, which was subject to consultation, alongside the JLP Consultation Document, with statutory consultation bodies and Suffolk County Council between 21 August and 10 November 2017.

4.8 The SA assessed a number of strategic high level options under the following five headings:

1. Housing options
2. Economy options
3. Environment options
4. Infrastructure options
5. Place options.

4.9 The findings as reported in the SA were as follows:

#### Housing options

##### Housing – requirement

- **HR1 – Objectively Assessed Need (OAN):** Meeting OAN was considered to have positive impacts with regards to housing and positive temporary economic impacts through construction. In many aspects the spatial, temporal and permanence of impacts will be dependent upon the location, composition and delivery of allocations.

##### Housing – delivery

- **HD1 – Apply a contingency (reserve sites):** HD1 was found to provide a mechanism to meet housing need (HR1) with contingency to potentially assist delivery. However, the SA impacts would be the same and depend upon the location, composition and delivery of allocations.
- **HD2 – No contingency:** HD2 was considered to provide a mechanism to meet housing need (HR1). However, the SA impacts would be the same as HR1 and depend

upon the location, composition and delivery of allocations.

#### Review of the Settlement Hierarchy

- **SET1 – Key services:** Due to the concentration of services in the main settlements, SET1 would have the greatest impact in urban areas. However, the assessment recognised that such services are also located in some rural settlements (but not necessarily the wider rural hinterland).
- **SET2 – Key and supporting services:** In comparison to SET1, it was considered that SET2 would provide greater opportunity to reflect the existing settlement pattern taking account of the relationship between service provision and the network of settlements and their inter-relationships.

#### Spatial distribution

- **BHD1/MDH1 – County town focussed; BHD2/MHD2 – Market town/rural area balance; BHD3/MHD3 – Transport corridor focussed; and BHD4/MHD4 – New settlement focussed:** Due to the high level nature of the plan all the options for spatial distribution (BHD1, MHD1, BHD2, MHD2, BHD3, MHD3, BHD4 and MHD4) were found not to be comparable against the majority of criteria. BHD1/MHD1 would have positive impacts in relation to development in towns but, overall, score negatively for rural areas. BHD2/BHD2 would have impacts on both locations, whilst BHD3/MHD3 and BHD4/MHD4 would be dependent on location.

#### Housing types and affordable housing

- **HM1 – Housing mix to accord broadly with Strategic Housing Market Area (SHMA):** It was considered that HM1 would contribute to meeting housing needs but this may or may not be specific to demographic requirements. The option was assessed as impacting upon the composition of development and not the location.
- **HM2 – Requirement for specific dwelling types:** HM2 was determined to provide greater certainty in meeting specific housing needs in comparison to HM1. Similar to HM1, the option was assessed with regard to the composition rather than the location of development.
- **HM3 – Residential and nursing home specialist housing:** It was decided that HM3 would support housing and employment criteria. The location and composition of development(s) would be specific to the impact on the majority of other criteria.

- **AH1 – Setting a requirement for affordable housing:** It was found that AH1 would contribute positively to population, health and housing criteria.
- **RE1 – No market housing on rural exception sites:** The provision of rural exception housing was appraised as being positive in terms of population, health and housing criteria but specific impacts will be dependent upon the location and composition of development.
- **RE2 – Market housing supported on rural exception sites:** The provision of rural exception housing was found to be positive in terms of population, health and housing criteria but specific impacts would be dependent upon the location and composition of development. Inclusion of market housing within the mix may improve the degree to which schemes contribute to the mix and type of housing.

#### Rural growth and development

- **RG1 – A policy criteria based approach:** This policy approach was determined to enable delivery of housing which would contribute to meeting housing need. However, there was uncertainty in terms of site specific impacts that would only be assessed at scheme delivery on each individual proposal. Individual and cumulative impacts cannot be determined.
- **RG2 – Allocations with flexibility for small scale infill:** It was found that this policy approach would enable delivery of housing which would contribute to meeting housing need. Whilst the impact of options would not be clear until areas are identified, in comparison to RG1, the assessment of changes to boundaries could be undertaken at allocation. A criterion for infill development gave an indication of potential mitigations albeit impacts would be dependent on locations of developments.
- **HG1 – Continuation of the current approach which would classify hamlets as open countryside in the settlement hierarchy):** It was considered that HG1 applied a restriction to maintain the status quo in policy terms. Therefore, many impacts would be negligible and/or unknown if dependent upon site specifics.
- **HG2 – Include a policy in New Joint Local Plan:** HG2 was found to contribute positively to population, housing and health indicators. The majority of other indicators were unknown depending upon location, composition and delivery of development.

#### Accommodation needs of gypsy and travellers

- **GT1 – Allocate site(s) to meet identified requirements:** It was decided that GT1 would contribute to housing criteria. Other impacts would be dependent

upon the location, composition and delivery of allocations.

- **GT2 – Allocate sites for Gypsy and Travellers as part of residential allocations:** It was considered that GT2 would contribute to housing criteria. Other impacts would be dependent upon the location, composition and delivery of allocations, as included within wider housing allocations.
- **TS1 – Allocate site(s) to meet identified requirements:** TS1 was found to contribute to meeting specific housing needs. Other impacts would be dependent upon the location, composition and delivery of development.
- **EGT1 – Protect existing authorised pitches and plots:** EGT1 was considered to have a largely neutral impact as it proposed to maintain the status quo. Where impacts arise from the use on this site, this was found to be largely unknown at this stage. It would be informed by the site specific proposals.

#### Economy options

##### Economic needs

- **ECON1 – Allocate to identified need:** Through allocating sufficient land to meet needs, ECON1 was determined to score positively on economic criteria.
- **ECON2 – Allocate above identified need:** In comparison to ECON1, ECON2 was considered to have greater potential for economic growth but the impact would be dependent upon the location of sites, demand and the composition and delivery of proposals. Whilst land would be made available in the short term, the temporal impact would be dependent on delivery.

##### Town centres and retail

- **OC1 – Restrict out of centre retail development:** Whilst a number of impacts would be dependent upon the location of sites, OC1 scored positively in terms of town centre impacts and transport accessibility. The location for out of centre development would impact upon the site specific impacts (currently identified as unknown).
- **OC2 – Support out of centre retail development to meet capacity requirements:** Whilst a number of impacts would be dependent upon the location of sites, OC1 scored more positively than OC2 in terms of town centre impacts and transport accessibility. The location for out of centre development would impact upon the site specific impacts (currently identified as unknown).

- **TC1 – Town centre and primary shopping areas:** Through making provision for a mix of town centre uses within the centres criteria on service accessibility and economy scored positively.
- **PS1 – Primary and secondary shopping frontages:** Through making provision for a mix of uses within primary and secondary frontages criteria on service accessibility and economy scored positively.
- **RIA1 – Impact assessment threshold as per NPPF:** RIA1 concerned a quantifiable threshold applied to a process and did not give an indication on the outcome of an assessment. Therefore, the impact was assessed as not relevant.
- **RIA2 – Impact assessment threshold:** RIA2 was a quantifiable threshold applied to a process and did not give an indication on the outcome of an assessment. Therefore, the impact was assessed as not relevant.

#### Environment options

##### Biodiversity

- **BIO1 – Protection of designations, habitats and species:** It was determined that BIO1 would contribute positively to countryside, water, air, material assets and biodiversity criteria.
- **BIO2 – Protection and enhancement of designations, habitats and species:** In comparison to BIO1, it was found that BIO2 had greater potential for ensuring protection plus enhancement to all biodiversity across both Districts. Both BIO1 and BIO2 were considered to contribute positively to countryside, water, air, material assets and biodiversity criteria.

##### Climate change

- **FR1 – Flood Risk (leave to the NPPF to provide policy framework):** Through making provision for flood risk management that meets the two Districts' needs, FR1 scored positively on environmental and flood risk management criteria.
- **RE1 – Renewable Energy (leave to NPPF to provide policy framework):** Whilst a number of impacts would be dependent upon the location of schemes, it was considered that RE1 would have greater potential than RE2 for renewable initiatives to be taken forward with mitigation as appropriate. The impact of which however would be dependent upon the location of sites, demand and the composition and delivery of proposals.
- **RE2 – Renewable Energy policy:** Whilst a number of impacts would be dependent upon the location of schemes, it was found that RE2, compared to RE1, had

greater potential for renewable initiatives to be taken forward with mitigation as appropriate. The impact would be dependent upon the location of sites, demand and the composition and delivery of proposals.

- **BS1 – Building Sustainability (include sustainable standards):** Through making provision for water efficiency to address water scarcity in the area, BS1 scored positively on energy efficiency impacting on water and climate change criteria.

##### Landscape, heritage and design

- **L1 – Maintain local landscape designations:** The identified impacts reflected the intent of the policy to maintain existing designations and therefore impacts were generally found to be neutral. Developments within such designations would be required to maintain (neutral) or enhance (positive) landscape qualities.
- **L2 – Remove local landscape designations and apply a criterion based policy:** In comparison to L1, it was determined that L2 would have a greater potential to minimise impacts and enhancement to all landscape where possible across both Districts as it would not be specific to a designation. The criteria contained within the policy would be central to its impacts and where necessary could ensure there is scope for mitigation. However, whilst the intent of the policy was clear the absence of the criteria meant that many impacts were unknown.
- **HA1 – Protection of non-designated heritage assets:** Through making provision for a list of all non-designated heritage assets in the area, HA1 scored positively in terms of cultural criteria and the landscape setting.

##### Infrastructure options

##### Infrastructure

- **INF1 – Leave to NPPF to provide the policy framework:** It was considered that many impacts were unknown pending detail on the possible location and composition of projects.
- **INF2 – To have a strategic infrastructure policy:** It was considered that many impacts were unknown pending detail on the possible location and composition of projects.

##### Open space – residential

- **OS1 – Set a prescriptive requirement for on-site provision:** This policy approach would standardise provision of open space. The impact of this policy approach was considered to be largely unknown because it would be dependent upon the location of

provision (including the provision that is already in place and required in that locality) and the scheme specifics.

- **OS2 – Relate requirements to identified needs:** This policy approach would make provision for open space. The impact of the approach was considered to be largely unknown because it would be dependent upon the location of provision and the scheme specifics. Unlike OS1 it was found that the provision could take greater account of provision and requirements in a specific locality.

#### Open space – non-residential

- **NROS1 – Leave to NPPF to provide policy framework:** It was decided that impacts would be largely dependent upon the location and composition of provision.
- **NROS2 – Non-residential uses (include policy):** It was decided that impacts would be largely dependent upon the location and composition of provision.

#### Open space – protection of existing spaces

- **POS1 – Leave to NPPF to provide policy framework:** It was decided that many of the impacts would be dependent upon the composition and location of the proposals.
- **POS2 – Protection of open spaces (include policy):** It was decided that many of the impacts would be dependent upon the composition and location of the proposals.

#### Community facilities

- **CF1 – Leave to NPPF to provide policy framework:** It was decided that many of the impacts would be dependent upon the composition and location of the proposals.
- **CF2 – Protection and provision of community facilities:** It was decided that many of the impacts would be dependent upon the composition and location of the proposals.

#### Place options

##### Settlement boundaries

- **BND1 – Review and designate boundaries for all settlements above a threshold of 10 dwellings adjacent to or fronting an existing highway:** It was found that BND1 would make provision to enable small scale development in smaller settlements and hamlets. The approach would enable housing and therefore contribute to housing need criteria. The other specific impacts would be dependent upon the specific

settlements, potential locations, composition and delivery of development.

## Second stage of SA work

### Updated SA Scoping Report (April 2019)

**4.10** In 2019, BMSDC commissioned Place Services to undertake an independent SA of the JLP. Although an internal Scoping Report had already been produced, Place Services produced an updated Scoping Report in April 2019 to ensure that the scope of the SA was in line with best practice and in response to the changing requirements of the updated 2019 National Planning Policy Framework (NPPF). The updated SA Scoping Report was subject to consultation with the statutory consultation bodies and Suffolk County Council.

### Regulation 18 Preferred Options SA (July 2019)

**4.11** An SA Report was produced by Place Services to accompany the JLP Preferred Options Consultation. This was consulted upon between Monday 22 July and Monday 30 September 2019 by members of the public, as well as statutory consultees.

**4.12** The SA Report contained an appraisal of the JLP's ten strategic policies and reasonable alternatives. The findings were as follows:

- **Policy SP01 – Housing Needs:** It was recommended that the policy should be progressed as the preferred approach because it would ensure significant positive short-long term effects on meeting housing needs and ensuring delivery.
  - No reasonable alternatives.
- **Policy SP02 – Affordable Housing:** It was recommended that the policy should be progressed as the preferred approach because it would enable affordable housing delivery throughout both urban and rural areas. The policy would also be flexible in ensuring that viability be a consideration should any exceptions be required and affect deliverability.
  - The Councils explored an alternative approach to this policy: (ALT1) A lower than the on-site affordable housing need requirement to the SHMA level. ALT1 was not considered the preferred approach.
- **Policy SP03 – Settlement Hierarchy:** It was recommended that the policy should be progressed as the preferred approach because it would enable growth to be directed to where people live across a wide range of higher-lower order settlements. The settlement hierarchy review was based on the quantitative level of

services and facilities in broad areas of settlements, allowing growth to be distributed to the Districts' most sustainable areas.

- The Councils explored three alternative approaches to this policy: (ALT1) a review of settlements based upon recognising key facilities/services only; (ALT2) a review of settlements based upon the population or size of settlements; and (ALT3) an extended criteria range of services and facilities. None of these alternatives were considered the preferred approach.
- **Policy SP04 – Housing Spatial Distribution:** It was recommended that the policy should be progressed as the preferred approach because it was considered to have more positive effects than the other options because it would result in a higher level of dispersal, ensuring benefits are more widely experienced across the Plan area and focused on where people live.
  - The Councils explored two alternative approaches to this policy: (ALT1) a new settlement; and (ALT2) focussed growth in Ipswich and Market Towns. Neither of these alternatives were considered the preferred approach.
- **Policy SP05 – Employment Land:** It was recommended that the policy should be progressed as the preferred approach because it would focus more on deliverability in that it reflects the evidence of the Lichfield's Sector Needs Assessment (2018), which forecast that existing supply is sufficient to meet baseline objectively assessed need over the plan period.
  - No reasonable alternatives.
- **Policy SP06 – Retail and Leisure:** It was recommended that the policy should be progressed as the preferred approach because it would have numerous benefits related to the vitality and viability of town centres, as well as sustainable transport movements and out-commuting.
  - No reasonable alternatives.
- **Policy SP07 – Tourism:** It was recommended that the policy should be progressed as the preferred approach because alongside Policy LP14 (Tourism and Leisure) in the draft JLP, as it would seek to encourage and protect tourism by enabling suitable development.
  - No reasonable alternatives.
- **Policy SP08 – Infrastructure Provision:** No recommendations were made because it was considered that the policy adhered to the requirements of the NPPF. Although it would result in positive effects

on social, economic and environmental themes, uncertainties were highlighted regarding the effects of improvements to highways infrastructure making private vehicle movements more attractive.

- No reasonable alternatives.

- **Policy SP09 – Cross-boundary Mitigation of Effects on Protected Habitats:** It was recommended that the policy should be progressed as a strategic issue to address its significant importance.

- No reasonable alternatives.

- **Policy SP010 – Climate Change:** It was recommended that the policy should be progressed and no other recommendations or mitigation measures be proposed at this stage.

- No reasonable alternatives.

**4.13** The July 2019 SA Report also contained an appraisal of 33 non-strategic delivery policies under the following four themes, similar to those used in the August 2017 SA:

- Housing
- Economy
- Environment
- Healthy Communities and Infrastructure.

**4.14** The Part 2 policies contained within the Regulation 19 JLP are developed from these non-strategic delivery policies (see **Table 4.1** below).

**4.15** Overall, the SA Report identified significant positive impacts in relation to the policy context against the following SA Objectives:

- SA Objective 1: To improve the health and wellbeing of the population overall and reduce health inequalities.
- SA Objective 3: To reduce poverty and social exclusion and ensure access to jobs and services.
- SA Objective 4: To meet the housing requirements of the whole community.
- SA Objective 9: To reduce contributions to climate change.
- SA Objective 10: To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.
- SA Objective 14: To achieve sustainable levels of prosperity and economic growth throughout the plan area.
- SA Objective 15: To revitalise the Districts' town centres.

Table 4.1: Development of the Part 2 JLP policies

Regulation 18 Preferred Options SA (July 2019)	Regulation 19 SA (October 2020)
Housing	
LP01 – Hamlets and Clusters of Development in the Countryside	LP01 – Windfall development in hamlets and dwellings clusters
LP02 – Residential Annexes	LP02 – Residential Annexes
LP03 – Residential Extensions and Conversions	LP03 – Residential Extensions and Conversions
LP04 – Replacement Dwellings in the Countryside	LP04 – Replacement Dwellings In The Countryside (Outside of Settlement Boundaries)
LP05 – Replacement Dwellings and Additional Dwellings on Sub-Divided Within Settlement Boundaries	LP05 – Replacement Dwellings and Additional Dwellings on Sub-Divided Plots Within Settlement Boundaries
	(NEW) LP06 – Mix and type of composition
LP06 – Supported and Special needs Housing	LP07 – Supported and Special Needs Housing
LP07 – Affordable Housing	LP08 – Affordable Housing
LP08 – Provision for Gypsy and Travellers and Travelling Showpeople	LP09 – Provision for Gypsy and Traveller and Travelling Showpeople
LP09 – Moorings and Marinas	LP10 – Moorings, Marinas and Houseboats
LP10 – Self-Build and Custom-Build	LP11 – Self-Build and Custom-Build
Economy	
LP11 – Employment Development	LP12 – Employment Development
LP12 – Safeguarding Economic Opportunities	LP13 – Safeguarding Economic Opportunities
LP13 – Retail and Town Centres	LP14 – Town Centre and retail
LP14 – Tourism and Leisure	LP15 – Tourism
LP15 – Countryside Tourist Accommodation	LP16 – Countryside Tourist Accommodation
Environment	
LP16 – Environmental Protection	LP17 – Environmental Protection
LP17 – Biodiversity	LP18 – Biodiversity
LP18 – Landscape	LP19 – Landscape
LP19 – Areas of Outstanding Natural Beauty	LP20 – Area of Outstanding Natural Beauty
LP20 – The Historic Environment	LP21 – The Historic Environment
LP21 – Change in Land Use for Equestrian or Other Animal / Rural Land Base Uses	LP22 – Change in Land Use for Equestrian or Other Animal/Rural Land Base Uses
LP22 – Agricultural Land to Residential Garden Land	LP23 – Agricultural Land to Residential Garden Land
	(NEW) LP24 – New agricultural/Rural
LP23 – Sustainable Construction and Design	LP25 – Sustainable Construction and Design

Regulation 18 Preferred Options SA (July 2019)	Regulation 19 SA (October 2020)
LP24 – Design and Residential Amenity	LP26 – Design and Residential Amenity
LP25 – Alternative Energy Sources, Storage and Distribution	LP27 – Energy Sources, Storage and Distribution
LP26 – Flood Risk	LP28 – Water resources and infrastructure
LP27 – Sustainable Drainage Systems	LP29 – Flood risk and vulnerability
Healthy Communities and Infrastructure	
LP28 – Designated Open Spaces	LP30 – Designated Open Spaces
LP29 – Services and Facilities Within the Community – Provision / Retention	LP31 – Services and Facilities Within the Community
LP30 – Safe, Sustainable and Active Transport	LP32 – Safe, Sustainable and Active Transport
LP31 – Managing Infrastructure Provision	LP33 – Managing Infrastructure Provision
LP32 – Health and Education Provision	LP34 – Health and Education Provision
LP33 – Developer Contributions and Planning Obligations	LP35 – Developer Contributions and Planning Obligations

**4.16** The SA contained an appraisal of 173 sites, 85 of which were allocated in the Preferred Options JLP (July 2019). It is not clear from the report which of the sites were reasonable alternatives. SA was also undertaken of 68 sites representing settlement boundary expansions.

**4.17** The SA Report identified significant positive impacts in relation to the site allocations against the following SA Objectives:

- SA Objective 3: To reduce poverty and social exclusion and ensure access to jobs and services.
- SA Objective 4: To meet the housing requirements of the whole community.
- SA Objective 15: To revitalise the Districts' town centres.

#### SA Addendum (July 2019)

**4.18** An SA Addendum was produced by Place Services as a result of some errors and site omissions in the Reg. 18 Preferred Options SA. The sites that were omitted have been included above in the total figure of sites that were appraised (173).

**4.19** Consultation responses on the SA work undertaken to date are contained within **Appendix A (Consultation Comments)** of this SA Report.

## This stage of SA work

### LUC's appointment

**4.20** BMSDC commissioned LUC in November 2019 to continue with the SA work, following on from the earlier work undertaken by BMSDC and subsequently by Place Services.

**4.21** As part of the commission, BMSDC requested LUC to review the SA work undertaken to date and, where necessary, to make refinements to ensure that the remaining stages of the SA are robust and as far as reasonably possible, legally compliant.

**4.22** As a result of this review, LUC identified a number of areas where improvements could be made to the SA process. These are reflected in the SA Scoping Report. These relate primarily to the criteria and assumptions to be used in the SA of potential site allocations. It should be noted that the SA Objectives remain unchanged.

## Chapter 5

### Sustainability Appraisal

### Findings for the Spatial Strategy Options

This chapter describes the Spatial Strategy Options that were subject to SA and how well the options performed against the SA Objectives.

**5.1** The consideration of options (or 'reasonable alternatives') is one of the most important parts of the SA process. The national Planning Practice Guidance states:

The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted. In doing so it is important to:

- outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base (employing the same level of detail for each alternative option). Criteria for determining the likely significance of effects on the environment are set out in schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004;
- as part of this, identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them;
- provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives.

Any assumptions used in assessing the significance of the effects of the plan will need to be documented. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.

- The development and appraisal of proposals in plans needs to be an iterative process, with the

proposals being revised to take account of the appraisal findings.

**5.2** Before deciding which detailed policies and site allocations to include in the Joint Local Plan, it was important to decide on the overall preferred spatial strategy. The spatial strategy sets out the Councils' preferred approach to the distribution of development across the Joint Local Plan area, indicating which places or broad locations are likely to be the focus of development, and which are likely to receive less development. The detailed policies and site allocations in the Joint Local Plan should be selected and designed to support and deliver the preferred spatial strategy.

**5.3** Choosing the preferred spatial strategy is therefore a critical stage in the plan-making process. The Councils are not faced with a blank sheet of paper. The selection of a spatial strategy needs to be guided by:

- Compliance with national planning policy, as set out in the National Planning Policy Framework.
- The current distribution of development in the Plan area, such as where the main towns are, the main transport links, how urban or rural the Plan area is, and the role and function of settlements within the Plan area, and the relationship between them and with settlements in neighbouring authorities, particularly where these are of a large scale and influence.
- Development that is already planned, such as where planning consent has been granted but not yet implemented.
- The environmental assets and constraints in the Plan area, in order to ensure that the most important environmental assets are safeguarded, and where possible the environment is improved.
- The objectives of the Councils, insofar as they relate to the Joint Local Plan, such as ensuring there are enough of the right type of homes to meet people's needs, supporting economic development and jobs, addressing the needs of more disadvantaged communities, minimising carbon emissions and dealing with air quality issues that can affect human health.

**5.4** By appraising alternative spatial strategy options, the SA can help provide information about how different options perform, which in turn can help the Councils decide which spatial strategy to pursue. It should be noted, however, that the SA does not decide which spatial strategy should be adopted. Other factors, such as the views of stakeholders and the public, and other evidence base studies, also help to inform the decision. The most important thing, however, is for the Council to show how these various factors, including the

SA, have been taken into account in deciding which spatial strategy to choose, and to demonstrate that the preferred spatial strategy is an appropriate strategy when compared to the alternatives.

**5.5** In theory, there are many different spatial strategies that could be chosen, although the differences between them can often be quite small. However, in practice, the range of alternatives is often not that great

### Spatial strategy options considered earlier in the SA process

**5.6** There have already been two rounds of consideration of spatial strategy options. The first round was undertaken at an early stage in the plan-making process and was undertaken at a very high level. The second round considered a much more restricted range of spatial strategy options. These two rounds are described below.

#### SA of Joint Local Plan options August 2017

**5.7** The first round of SA of spatial strategy options was undertaken internally by Council officers, and considered four spatial strategy options with each option separately appraised for each Council area – Babergh and Mid Suffolk:

- County town focused
- Market town/rural area balance
- Transport corridor focused
- New settlement focused.

**5.8** Although the SA did identify differences between the different options, it concluded that, due to the high level nature of the Plan all the options for spatial distribution were not comparable against the majority of criteria at that stage. The SA was able to conclude, though, that the County town focused option performed positively for development on towns but overall scored negatively for rural areas, that the Market town/rural area balance option impacted on both locations, and the effects of the transport corridor focused option and the new settlement focused options would be dependent on location.

#### SA of Regulation 18 (Preferred Options) June 2019

**5.9** The second round of SA of spatial strategy options, undertaken by Place Services, considered three spatial strategy options:

- A new settlement
- Focussed growth in Ipswich and Market Towns
- A balance to growth in the strategic transport corridor areas, as well as ensuring that other market towns and

rural communities benefit from appropriate growth (the preferred option).

**5.10** It was acknowledged in the SA Report (June 2019) that the exploration of a new settlement for the Plan period had not been progressed beyond a notional consideration due to two key factors:

- No specific 'new settlement' options or concepts were submitted that adhere to the Council's locational criteria for 'allocations of strategic importance', and any locations identified by the Councils could not be considered demonstrably available, deliverable, or developable; and
- A sufficient supply of proportionate sites exists in and around existing settlements to meet the Council's objectively assessed need.

**5.11** The SA went on to note that the Regulation 18 Preferred Options Plan recognised that beyond the Plan period there is the possibility that a new settlement might be a realistic option within the Plan area, should housing need continue to be high. Therefore, the Plan stated that the Councils are mindful to give consideration to the longer term prospect of planning for a new settlement at the Plan review (due to be undertaken within 5 years of this Plan adoption) and included that some key criteria for the broad location of a new settlement would likely include:

- Significant land for a genuine discrete new settlement, or the realistic prospect for transformational development, both in nature and scale, of an existing settlement.
- Opportunities for significant re-use of brownfield land.
- Opportunities for improvement and integration of strategic transport routes.
- Accessibility to job concentrations, or the realistic prospect for significant new employment land located with new homes.
- Opportunities to optimise new infrastructure delivery.

**5.12** The SA concluded that the preferred approach in the Regulation 18 Preferred Options Plan should be progressed:

*"The effects of the Policy can be considered more positive than other options as there will be a higher level of dispersal, ensuring benefits are more widely experienced across the Plan area and focused on where people live."*

## Current spatial strategy options SA

**5.13** Notwithstanding the findings of the earlier two rounds of SA work, the Councils were concerned to ensure that a full range of spatial strategy options was tested again, to give

them confidence that the preferred spatial strategy is indeed the most appropriate one to pursue, or whether there are alternatives that warranted further consideration that could result in a changed or refined preferred spatial strategy approach.

**5.14** Therefore, following LUC's appointment to continue with the SA work, nine spatial strategy options were presented in the SA Scoping Report, which was consulted upon in March and April 2020:

1. Spatial strategy option 1: Focusing development at the Ipswich Fringe.
2. Spatial strategy option 2: Focusing development at the Market Towns/Urban Areas.
3. Spatial strategy option 3: Focusing development at the Core Villages.
4. Spatial strategy option 4: Proportionate growth – all settlements increase in size in proportion to current population.
5. Spatial strategy option 5: Hierarchical growth – distributing development according to the settlement hierarchy.
6. Spatial strategy option 6: Focusing development along sustainable transport corridors.
7. Spatial strategy option 7: Focusing development at one or more new settlements.
8. Spatial strategy option 8: Focusing development at the main concentrations of employment.
9. Spatial strategy option 9: Focusing development in the least environmentally constrained areas.

**5.15** The SA Scoping Report received a number of consultation responses. All the consultation responses that expressed an opinion supported the nine spatial strategy options. There were two main comments:

**5.16** Some consultees suggested including an additional spatial strategy option that included focusing development at the hinterland villages and/or the hamlets in the Plan area. It has been decided not to include this as a separate new spatial strategy option because development at the hinterland villages and hamlets are covered by Spatial strategy option 4 (Proportionate Growth) and Spatial strategy option 5 (Hierarchical Growth).

**5.17** A number of consultees commented upon the need to define what is meant by Spatial strategy option 6 (Sustainable Transport Corridors). The sustainable transport corridors have now been clearly defined.

### Description of the spatial strategy options

**5.18** A description of each of the spatial strategy options is provided below. These are accompanied by maps (see **Figures 5.1 to 5.8**) which shows in diagrammatic form the general locations where development would be delivered

under each option. Further details of Spatial Strategy Option 7 (Focusing development at one or more new settlements) can be found in **Chapter 6 (Sustainability Appraisal of Reasonable Alternative Sites)** under the section entitled 'New settlement alternatives'.

#### **Spatial strategy option 1: Focusing development at the Ipswich Fringe (Figure 5.1)**

Ipswich is the county town of Suffolk and exerts an influence over a large geographical area for where people live and contribute to the economy. Identifying growth close to Ipswich provides access to the town's employment opportunities, services and facilities. Investment can be added to significant existing infrastructure networks. Lower volumes of growth would be attributed to meeting housing need in other and rural areas.

#### **Spatial strategy option 2: Focusing development at the Market Towns & Urban Areas (Figure 5.2)**

The Districts' market towns and urban areas comprise Eye, Hadleigh, Needham Market, Stowmarket and Sudbury (including part of Chilton Parish and Great Cornard Parish), as well as Pinewood which forms part of the urban area of Ipswich, although within the Babergh Mid Suffolk Joint Local Plan area. These areas are generally well served for employment, services and facilities. Capacity and opportunities for optimum infrastructure investment can be varied between settlements. Lower volumes of growth would be attributed to meeting housing need in the rural areas.

#### **Spatial strategy option 3: Focusing development at the Core Villages (Figure 5.3)**

Since 2001, approximately 60% of housing growth has come forward in 'rural' areas across Babergh and Mid Suffolk. Villages with a good range of services and facilities have played a key role and growth has helped to maintain their vitality. The network of 15 core villages in each District provide a focus for services and facilities across the rural area. Focussing development at the core villages would create a more dispersed pattern of development. Lower volumes of growth would be attributed to meeting housing need in the strategic Ipswich fringe, urban areas and market towns and smaller rural communities.

#### **Spatial strategy option 4: Proportionate growth (Figure 5.4)**

This option is a mechanical approach that would seek to identify growth requirements for each settlement applying a percentage increase according to existing housing stock by parish. All settlements are different and a proportionate approach to growth would result in variance in the level of growth. Other factors such as services and facilities would not be a consideration.

#### **Spatial strategy option 5: Hierarchical growth (Figure 5.5)**

The settlement hierarchy is a tool used to identify the broad sustainability characteristics of all settlements in the Districts, based upon a factual assessment of the levels of services/facilities and access to key employment areas. This approach would attribute growth levels using the settlement hierarchy categories only. Settlements at the top of the hierarchy (with most services and facilities) would take larger volumes of growth, with settlements at the bottom taking smaller volumes of growth.

#### **Spatial strategy option 6: Focusing development along sustainable transport corridors (Figure 5.6)**

The London – Cambridge and London – Norwich rail routes and the A12, A14 and (to a lesser extent) A140 roads are crucial transport connections for residents and businesses in the area and beyond. A number of settlements across the Plan area benefit from a close relationship to the transport corridors. Further development in these locations provides closer access for opportunities to travel by more sustainable means – these corridors have greater accessibility to bus services than other parts of the Districts. Investment can be added to significant infrastructure networks. Lower volumes of growth would be attributed to meeting housing need in settlements further away from the transport corridors.

#### **Spatial strategy option 7: Focusing development at one or more new settlements (Figure 6.5)**

Where significant new growth is identified and required, national planning policy encourages councils to consider whether this can be accommodated through planning for a new settlement. These settlements are intended to be of a scale of at least 1,500 and genuinely stand-alone communities, rather than extensions to existing towns and villages. The scale of the settlement is vital to ensure there is sufficient critical mass to fund the extensive level of new infrastructure – free-standing new settlements would need to be towards the upper end of 2,000 to 5,000 dwellings to support a secondary school and

healthcare hub. Beyond what has already been granted planning permission in the Plan period, minimal additional growth would be attributed to meeting housing needs in any other settlements.

**Spatial strategy option 8: Focusing development at the main concentrations of employment (Figure 5.7)**

Access to employment is an important determinant of the sustainability of growth and development. The greatest concentrations of employment are generally associated with the larger settlements, which are supported by a network of sites of varying scales across the wider rural area. Development would be located within a defined buffer catchment of an existing or allocated strategic employment site or enterprise zone. Lower volumes of growth would be attributed to meeting housing needs in areas without nearby employment sites. Although larger settlements also provide concentrations of employment outside strategic employment sites and enterprise zones, such as in town centres, these are covered under other spatial strategy options.

**Spatial strategy option 9: Focussing development in the least environmentally constrained areas (Figure 5.8)**

The Districts have a rich natural and historic environment, with protected areas such as Sites of Special Scientific Interest, Special Protection Areas and Areas of Outstanding Natural Beauty. Significant areas are also characterised by other constraints such as heritage assets, conservation areas, sensitive landscapes, flood zones and designated open space. Development would be prioritised to areas of least or no constraint. It should be noted that, in the map shown in Figure 5.8, the darker the colour the generally less constrained the location in terms of environmental assets and constraints.

**5.19** It should be noted that the above spatial strategy options are not mutually exclusive but are designed to draw out the sustainability pros and cons of focusing development in different ways across the two Districts. The preferred spatial strategy is likely to be a combination of two or more of the spatial strategy options listed above.

**Summary of findings**

**5.20** The SA scores for all the spatial strategy options for each SA Objective are shown in **Table 5.1**.

**Table 5.1: Summary SA scores of spatial strategy options**

SA Objective	Option 1: Ipswich Fringe	Option 2: Market Towns and Urban Areas	Option 3: Core Villages	Option 4: Proportionate Growth	Option 5: Hierarchical Growth	Option 6: Sustainable Transport Corridors	Option 7: New Settlements	Option 8: Strategic Employment Sites and Enterprise Zones	Option 9: Least Environmentally Constrained Areas
SA1: Health and Wellbeing	++/-?	++/-?	++/-	+/-	+/-	+/-	++/-?	++/-	+/-?
SA2: Education	+/-?	++/-?	+/-?	+/-?	+/-?	+/-?	++/--?	++/-?	+/-?
SA3: Access to Jobs and Services	++/-?	++	++/-	+/-	+/-	+/-	++/--?	++/-	+/-?
SA4: Housing	++/--?	++/-?	++/-?	++/-?	++/-?	++/-?	++/-?	++/-	++/--?
SA5: Water	--?	--?	--?	--?	--?	--?	--?	--?	-?
SA6: Air and Noise Pollution	--/+	++/-	++/--	--/+	--/+	++/--	+/-?	++/-	--
SA7: Soils and Minerals	--?	--?	--?	--?	--?	--?	--?	--?	--?
SA8: Waste	0	0	0	0	0	0	0	0	0
SA9: Climate Change Mitigation	++/-	++/-	+/-	--/+	--/+	++/--	++/-?	++/-	--
SA10: Climate Change Resilience	-?	-?	-?	-?	-?	-?	-?	-?	-?

SA Objective	Option 1: Ipswich Fringe	Option 2: Market Towns and Urban Areas	Option 3: Core Villages	Option 4: Proportionate Growth	Option 5: Hierarchical Growth	Option 6: Sustainable Transport Corridors	Option 7: New Settlements	Option 8: Strategic Employment Sites and Enterprise Zones	Option 9: Least Environmentally Constrained Areas
SA11: Biodiversity and Geodiversity	--?	--?	--?	--?	--?	--?	+/-?	--?	-?
SA12: Historic Environment	-?	-?	--?	--?	--?	--?	-?	--?	-?
SA13: Landscapes and Townscapes	--/+?	--/+?	--?	--?	--?	--/+?	--?	--?	-?
SA14: Economic Growth	--/+?	++/-	+/-	+/-?	+/-?	+/-?	+/-?	++/-	--/+?
SA15: Revitalising Town Centres	--/+?	++	+/-	+/-	+/-	++/-	--/+?	++/-?	--/+
SA16: Sustainable Transport	++/-	++	+/-	+/-?	+/-?	++/--	++/-?	++/-?	--/+

**5.21** Looking across the SA Objectives as a whole, the spatial strategy option that performs most strongly is Option 2 (Market Towns & Urban Areas). This is primarily because the Market Towns in Babergh and Mid Suffolk, and the part of the Ipswich urban area that falls within the Babergh Mid Suffolk plan area, tend to be where the jobs, services and facilities are concentrated, which also means that they can contribute to reducing the need to travel by car and hence minimise increases in air pollution and carbon emissions. Three out of the five Market Towns have railway stations, as does Ipswich.

**5.22** Similarly, Option 8 (Employment Led) performs well, primarily because the Strategic Employment Sites and Enterprise Zones are located at the Market Towns and within or close to Ipswich although some are located at smaller settlements along the A14 corridor. The effects of this option reflect aspects of the effects of Option 1 (Ipswich Fringe), Option 2 (Market Towns & Urban Areas), and Option 6 (Sustainable Transport Corridors).

**5.23** Overall, Option 1 (Ipswich Fringe), Option 3 (Core Villages) and Option 6 (Sustainable Transport Corridors) perform similarly. Option 1 performs moderately well because development in the Ipswich urban fringe would be reasonably close to the major centre of employment, services and facilities in the area. Ipswich is already the focus of a significant amount of in-commuting from Babergh and Mid Suffolk, and therefore concentrating development here would reduce journey lengths and potentially offer greater opportunity to use sustainable transport modes, such as buses, cycling and potentially walking. However, focusing development here could still result in car travel from the Ipswich Fringe, and impacting upon the AQMAs in the town, and the distances from the outer reaches of the Ipswich Fringe, coupled with the barriers of the dual carriageways

around Ipswich, may militate against walking and cycling. This option would not meet the needs of other parts of Babergh and Mid Suffolk, including the Market Towns and more rural locations. It is also well within the zone by which recreation impacts on the Stour and Orwell Estuaries SPA and Ramsar site would need to be mitigated.

**5.24** The SA of Option 3 (Core Villages) recognises that the Core Villages provide a range of services and facilities in their own right, and that it is important to maintain these, but they do not offer the jobs, services and facilities of the larger settlements. However, it is important to note that there are some Core Villages well located in relation to the Market Towns, specifically Great Cornard which is adjacent to Sudbury, and Stowupland to Stowmarket, and some Core Villages, such as Woolpit, do have larger employment areas. Whilst a few Core Villages have or are close to railway stations, several of the Core Villages are not as well located for sustainable transport networks and could generate car dependency. Some of the Core Villages are also in more environmentally sensitive areas, such as an AONB.

**5.25** Although Option 6 (Sustainable Transport Corridors) includes the term 'sustainable' because it follows those corridors with accessibility to frequent bus services and/or railway lines, the SA found that it would still be likely to generate significant car traffic, and that there is a risk that development along those corridors could result in an element of dispersal in terms of access to services and facilities if not concentrated in the main settlements. Although it does not perform as well as Option 2 (Market Towns & Urban Areas) and Option 8 (Employment Led), if development under Option 6 were to be concentrated in the locations promoted under these options, rather than more dispersed, then it would perform more strongly.

**5.26** Option 4 (Proportionate Growth) and Option 5 (Hierarchical Growth) performed similarly but relatively poorly overall. This is because, although it is recognised that the smaller settlements require homes and support for their services and facilities, their offer is weaker than larger settlements, and they have fewer jobs to offer, which means that the more dispersed pattern of development could lead to considerable car dependency, which would impact upon carbon emissions given the lack of sustainable transport options. This is notwithstanding that both these options would provide for development at the larger settlements too. In addition, this approach could lead to development in the more environmentally sensitive parts of the Districts, such as the AONBs and within the recreational mitigation zone of the internationally protected biodiversity sites along the Stour and Orwell estuaries.

**5.27** Option 9 (Environmentally Led) might have been expected to perform particularly strongly against the environmentally focused SA Objectives. To a certain extent this is true, but the least environmentally constrained parts of Babergh and Mid Suffolk tend to be some of the more rural areas, which have little in the way of jobs, services, facilities and sustainable transport, so this option performs poorly against the social and economic SA Objectives, and with respect to carbon emissions. However, there are areas close to some of the Market Towns, such as Stowmarket and Sudbury, that are less environmentally constrained and that could form part of this option.

**5.28** The performance of Option 7 (New Settlements) depends upon where such a new settlement might be developed. In theory, a location could be chosen that minimises the risk of significant negative effects on environmental assets, such as best and most versatile agricultural land (SA Objective 7), biodiversity and geodiversity (SA Objective 11), the historic environment (SA Objective 12), and the landscape (SA Objective 13). However, Option 9 (Environmentally Led) has shown that the least environmentally constrained parts of Babergh Mid Suffolk tend to be in the more rural locations and introducing a new settlement into such a location will inevitably change the area's landscape character. Given that it is difficult to achieve self-containment within a new settlement, particularly smaller scale new settlements that do not provide a full range of services, facilities and jobs. On the other hand, a new settlement could 'design-in' walking and cycling (SA Objective 16), low carbon energy networks (SA Objective 9), etc. from the start. The SA recognised that new settlements take a long time to plan and deliver, that it can be many years before the planned range of services and facilities are provided, that there is no guarantee that jobs will be created on site, all of which could lead to considerable car dependent journeys elsewhere. There is also a risk that new settlements could divert investment that would otherwise go into existing

settlements, particularly the Market Towns, whose high streets, jobs, services and facilities require support and investment in their own right.

**5.29** It should be noted that nearly all options should be able to deliver the volume of housing needed (SA Objective 3), although some will be better placed to deliver the range and type of housing across the two Districts better than others. Nearly all options could lead to the loss of best and most versatile agricultural land to development (SA Objective 7) and could have significant negative effects on water quality (SA Objective 5), biodiversity (SA Objective 11), the historic environment (SA Objective 12) and the landscape and townscapes (SA Objective 13). This is because large parts of the Districts have high quality agricultural land, are in water source protection zones, are in SSSI Impact Risk Zones or have local biodiversity interest, and because the historic environment interest is extensive across the Plan area, and considerable parts of the Districts have special landscape qualities.

**5.30** However, it is unlikely that any of the options would lead to the direct loss of assets such as SSSIs or scheduled monuments, and therefore it is often indirect effects that will require consideration (e.g. the effects on supporting ecological networks and the impacts of recreational disturbance, the setting of historic assets) and design and mitigation at the more detailed level. It may be difficult to avoid direct effects on all environmental assets, such as the loss of best and most versatile agricultural land where other sustainability objectives, such as developing close to services and facilities, need to be prioritised. Other environmental assets, such as the AONBs, can be protected from harm by ensuring that development is of a localised scale and character that strengthens rather than detracts from their special qualities.

## Conclusions

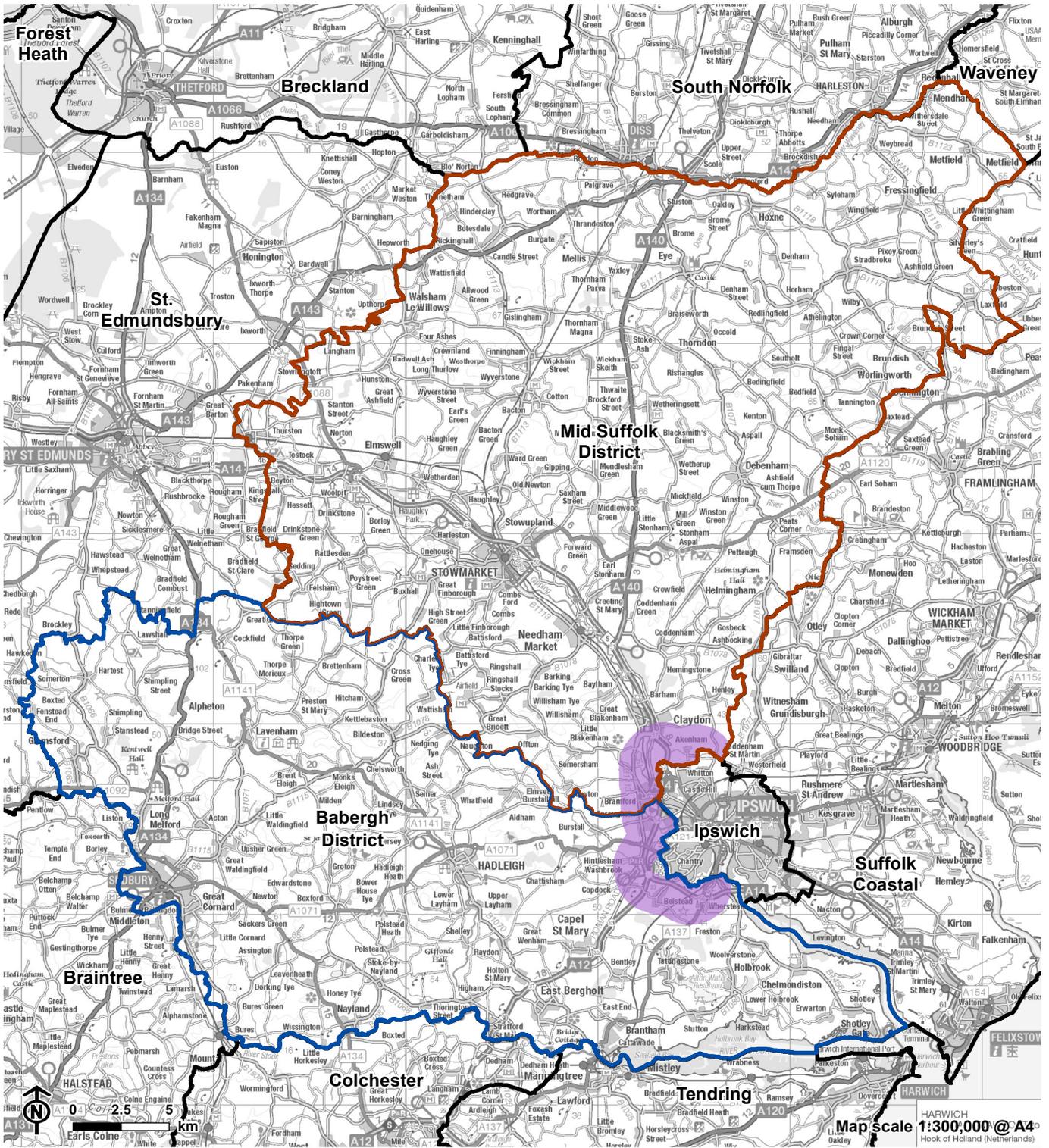
**5.31** In overall terms, a spatial strategy that focuses development on the Market Towns and Urban Areas, also being the major employment locations, is likely to prove the most sustainable across the full range of SA Objectives. However, there are only five Market Towns in the two Districts, and the part of the urban area of Ipswich that lies within the Babergh Mid Suffolk Plan area is relatively small.

**5.32** It is recognised that it would be neither practical nor sustainable for all development to be located at the Market Towns and Urban Areas, given that these only comprise around a quarter of the 2018 housing stock in the Plan area, and that the scope for developing within the part of the Ipswich urban area lying within the Plan area is very limited.

**5.33** There will be local needs outside the Market Towns and Urban Areas that need to be provided for, and support for the jobs, services and facilities that they provide. There is

therefore a good case in sustainability terms to allow for a reasonable proportion of development to be provided at the Core Villages and the Ipswich Fringe (which together account for around 40% of the 2018 housing stock), particularly in Sustainable Transport Corridors, all of which performed similarly across the SA Objectives taken as a whole.

**5.34** However, a large volume of dispersed development across the smaller settlements should be avoided.

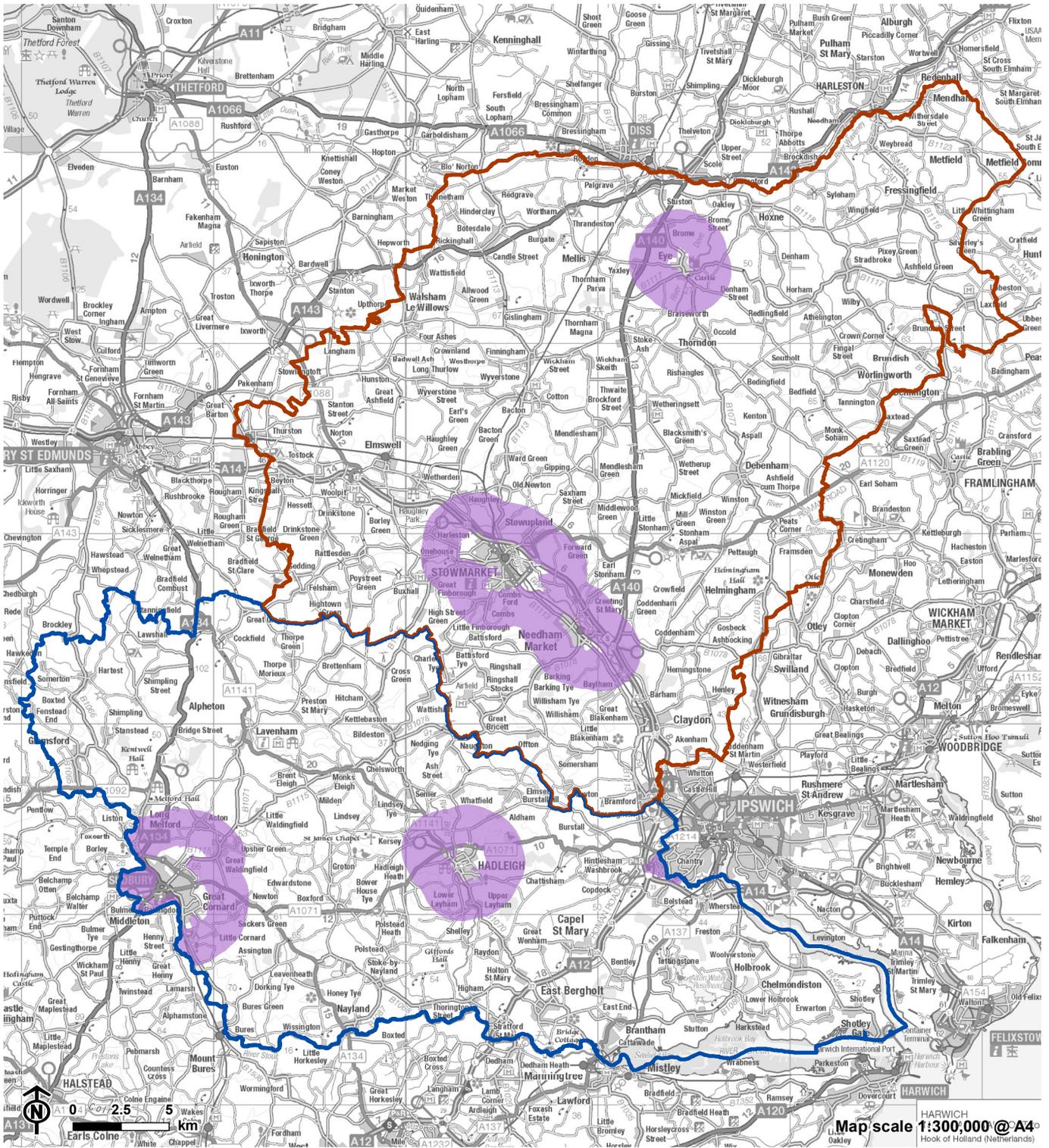


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CB:KS EB:Stenson\_K LUC FIG5\_1\_10920\_r0\_Spatial\_Option1\_A4P 26/05/2020 Source: BMSDC

**Figure 5.1: Spatial Strategy Option 1: Focusing development at the Ipswich Fringe**

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- Spatial option

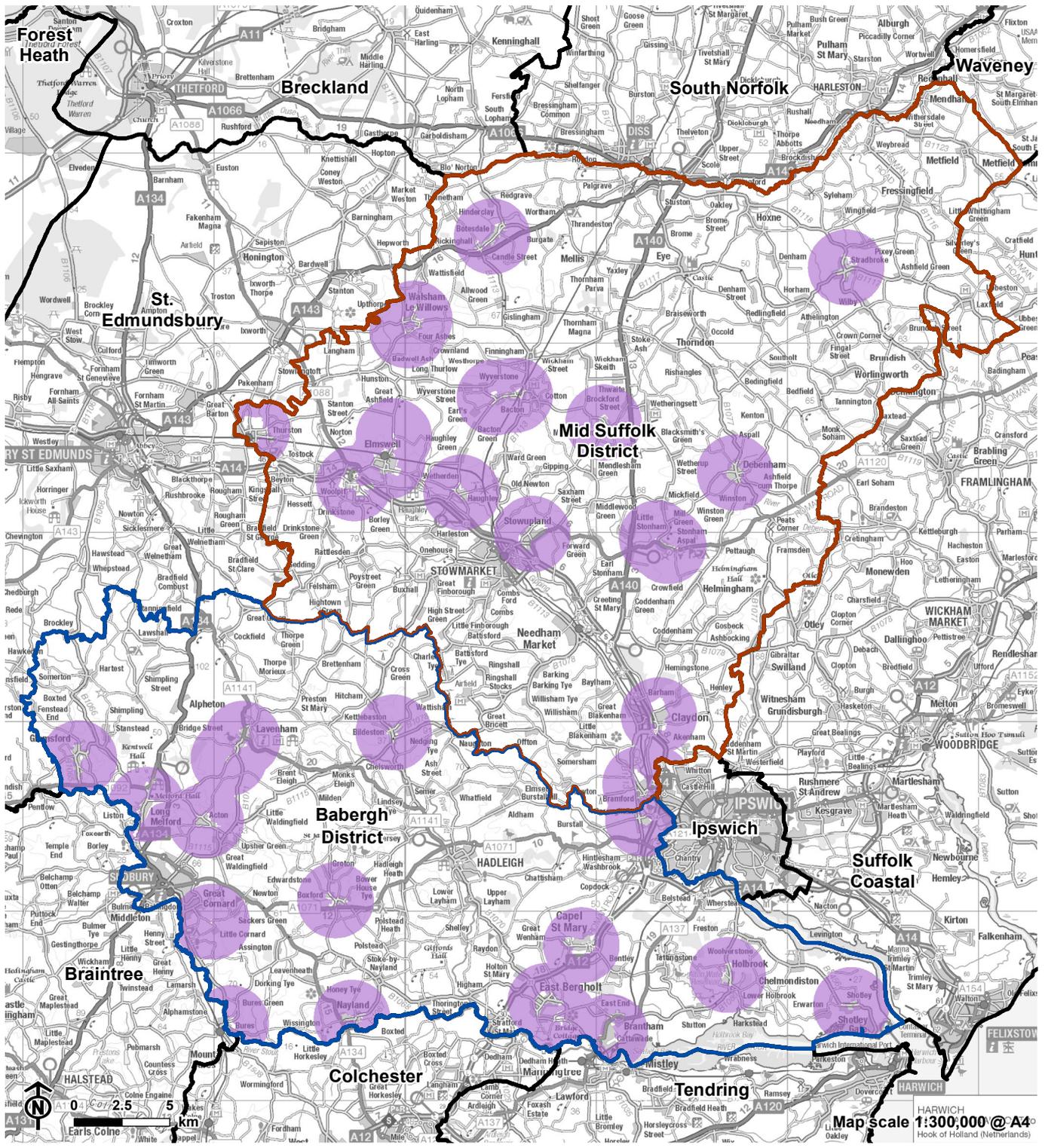


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**Figure 5.2: Spatial Strategy Option 2: Focusing development at the Market Towns/Urban Areas**

- Babergh District
- Mid Suffolk District
- Spatial option

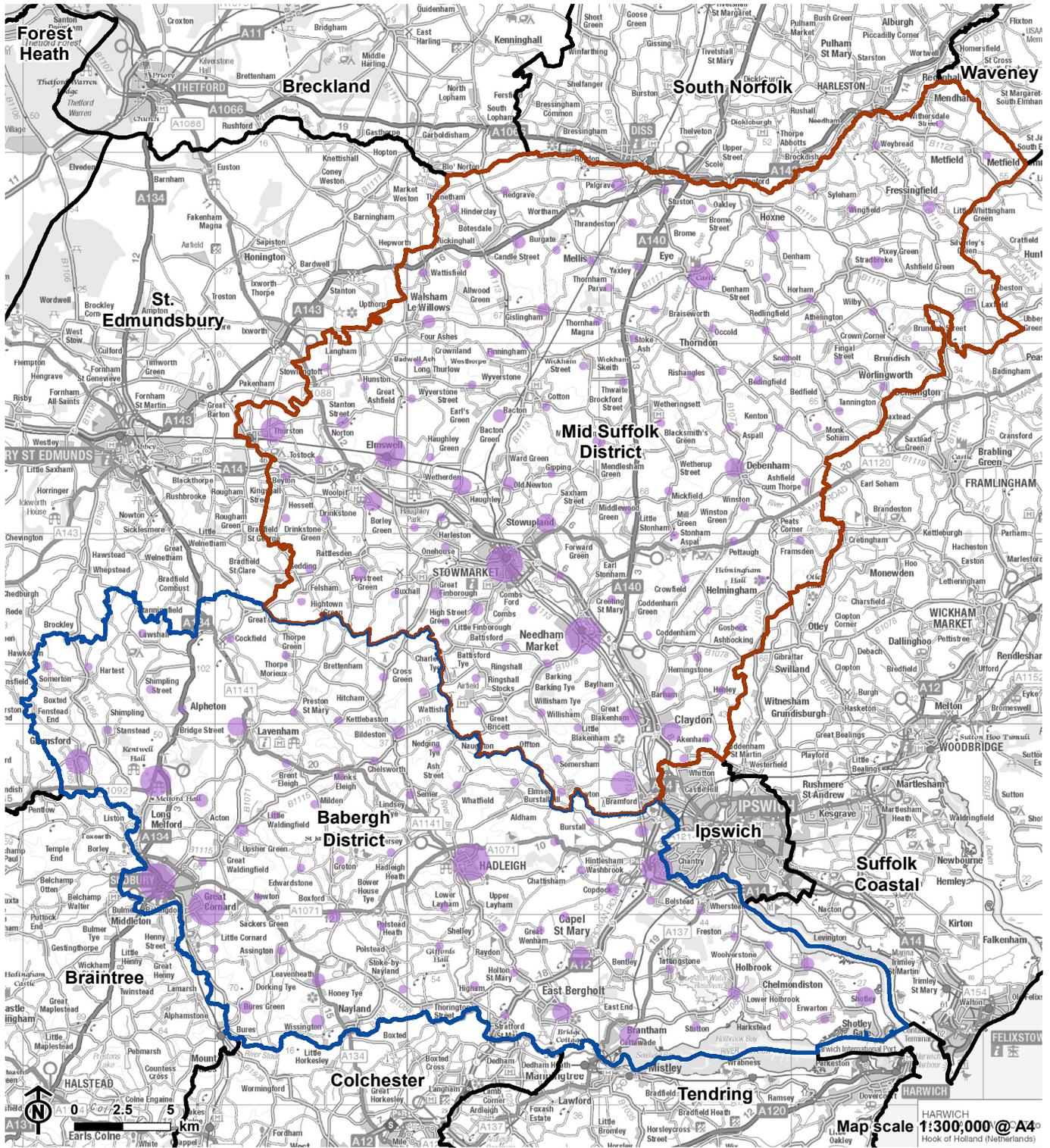


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**Figure 5.3: Spatial Strategy Option 3: Focusing development at the Core Villages**

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- Spatial option

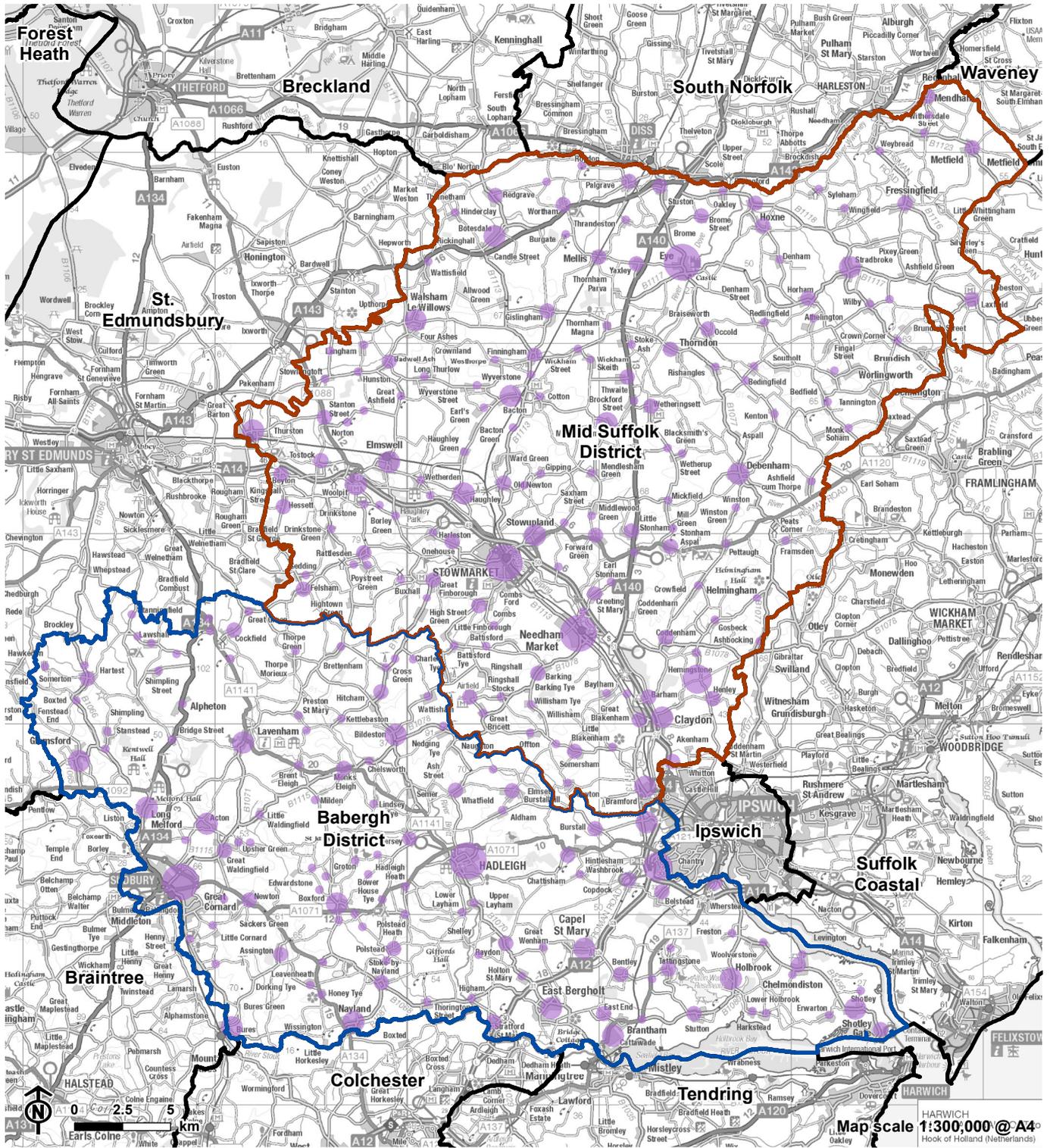


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**Figure 5.4: Spatial Strategy Option 4: Proportionate growth**

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- Spatial option

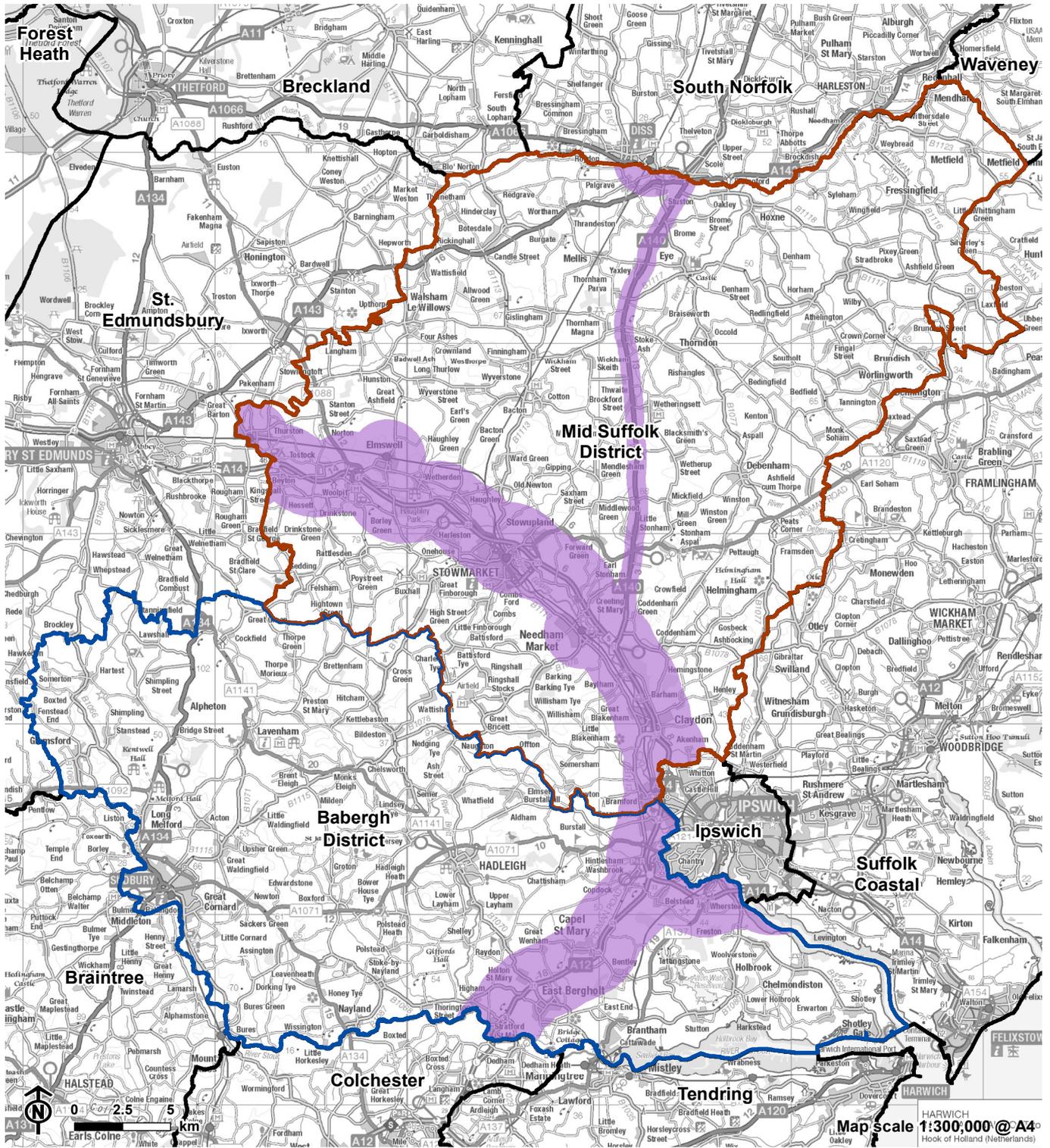


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CB:KS EB:Stenson\_K LUC FIG5\_5\_10920\_r0 Spatial\_Option5\_A4P 26/05/2020 Source: BMSDC

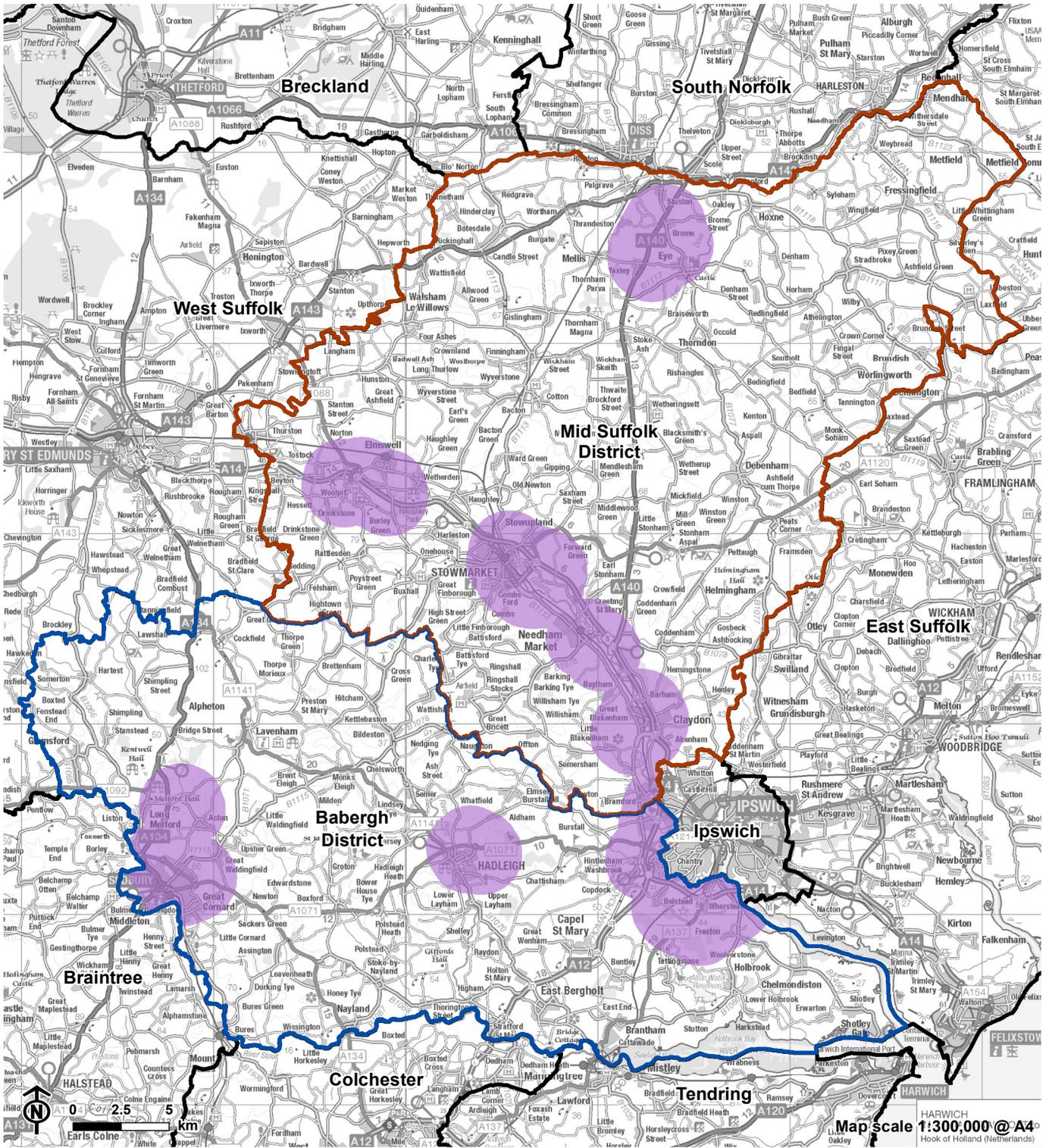
**Figure 5.5: Spatial Strategy Option 5: Hierarchical growth**

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- Spatial option



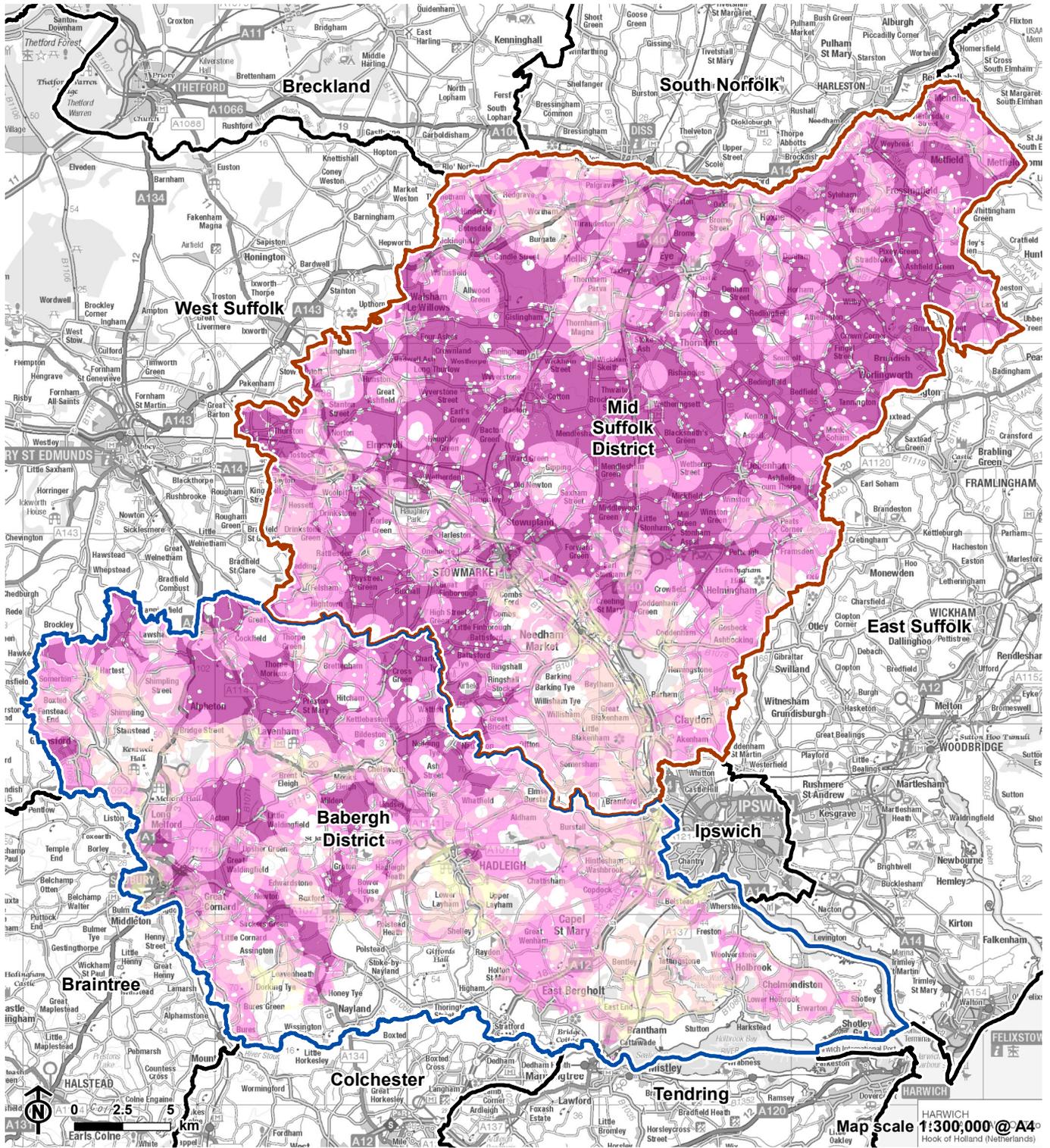
**Figure 5.6: Spatial Strategy Option 6: Focusing development along sustainable transport corridors**

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- Spatial option



**Figure 5.7: Spatial Strategy Option 8: Focusing development at the main concentrations of employment**

- Abbergh District
- Mid Suffolk District
- Neighbouring local authority
- Spatial option



**Figure 5.8: Spatial Strategy Option 8: Focusing development in the least environmentally constrained areas**

- Babergh District
  - Mid Suffolk District
  - Neighbouring local authority
- Spatial option
- Less constrained
  - More constrained

## Chapter 6

# Sustainability Appraisal of Reasonable Alternative Sites

Over 300 potential residential and employment site allocations were subject to SA. This chapter presents the findings of this part of the SA process.

### Introduction

**6.1** BMSDC have carried out a Strategic Housing and Economic Land Availability Assessment (SHELAA)<sup>9</sup> to identify 'reasonable' sites for consideration as allocations for residential or employment use within the JLP.

**6.2** In order to be considered reasonable sites, all potential sites were assessed by BMSDC to determine whether they are likely to be deliverable or developable. Deliverable sites are sites which are suitable, available now and achievable within five years. Developable sites are sites which are suitable with a reasonable prospect they could be available and achievable within the Plan period.

**6.3** The SHELAA considered a number of land sources:

- Existing housing and economic development allocations which are unimplemented.
- Outstanding planning permissions (unimplemented or under construction) for housing and economic development.
- Local authority owned land.
- Redundant public sector land.
- Vacant, derelict and underused land and buildings.
- Land and premises for sale
- Land submitted through 'Call for sites'.

**6.4** Apart from sites with extant planning permissions, sites had to be at least 0.25ha in size or capable of delivering 5 or more dwellings. Sites that would clearly contravene national planning policy or legislation were excluded from further assessment (e.g. sites within internationally or nationally designated biodiversity sites).

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<sup>9</sup> July 2019

**6.5** The remaining sites were assessed by BMSDC officers to determine their suitability, availability and achievability in accordance with national Planning Practice Guidance.

**6.6** The sites that met the suitability, availability and achievability tests were considered to be 'reasonable' sites for the purposes of SA.

## The appraisal process

**6.7** The methodology for the appraisal of the reasonable sites is described in **Chapter 2 (Methodology)** of this SA Report.

**6.8** The sites were classified as either residential or employment sites and appraised on a consistent and objective basis using the criteria and assumptions set out in **Table C.1** and **Table C.2** in **Appendix C (Assumptions Applied for the Sustainability Appraisal of Site Options)** of this SA Report. In order to maintain consistency with the earlier SA work, each site was assessed against a set of criteria for each SA Objective (the criteria have been refined since the original report to improve their relevance and robustness).

**6.9** An additional stage has been introduced in this SA Report, which involved converting the individual criteria based scores into 'significance scores', so that a single SA 'score' for each SA Objective is provided. How this was done is also described in **Chapter 2 (Methodology)** of this SA Report.

**6.10** In total, 259 reasonable residential sites have been subject to SA across the JLP area as a whole, and 53 reasonable employment sites.

**6.11** The appraisal was undertaken on a 'policy-off' basis, which means that potential site-specific mitigation was not taken into account. In doing so, each site has been assessed in exactly the same way, based on the baseline characteristics of each site and its environs. Given the large number of reasonable sites, this was a proportionate and reasonable approach, consistent with SAs of Local Plans undertaken elsewhere, where Local Plans have passed the tests of soundness and been adopted.

**6.12** In practice, it may be possible to mitigate for some of the significant negative effects identified for the sites. In many instances, such mitigation could apply to all the sites where significant effects are identified. In others, mitigation may not be achievable, or may only apply to certain sites and not others. However, as the first principle of sustainable development is to avoid significant adverse effects, before considering mitigating or offsetting effects, the 'policy-off' approach is a useful guide as to which sites perform most strongly against the SA Objectives.

**6.13** Mitigation can take many forms:

- With respect to environmental effects, mitigation could involve the use of buffer zones for biodiversity sites, or

guidance for development that could harm the setting of historic assets.

- In some instances, for example for large sites that are not well located to jobs, services and facilities, it may be possible to mitigate significant effects by providing jobs, services and facilities on site as part of development, such as the provision of a neighbourhood centre, a primary school, or bus services.

**6.14** Mitigation may have the effect of reducing a significant negative effect to a minor or negligible effect, or it may result in a significant negative effect becoming a positive effect (e.g. where a new school is proposed as part of a development).

**6.15** At the end of the analysis of significant effects for each SA Objective, a summary is given of possible mitigation that could be applied to the effects identified.

## Presentation of the findings of the SA of sites

**6.16** The presentation of the findings is firstly by reasonable residential sites, followed by reasonable employment sites.

**6.17** The SA findings are presented by SA Objective. The focus is on significant effects, as required by the SEA Regulations. Therefore, for each SA Objective, only the sites that scored significant positive effects or significant negative effects are listed in a series of tables. The tables are divided into sites that lie within Babergh District and sites that lie within Mid Suffolk District.

**6.18** To aid interpretation of these tables, the sites are divided into three categories:

- Allocated sites that are committed – these are sites that already have planning consent and are therefore automatically allocated in the JLP.
- Allocated sites – these are sites that do not have planning consent but which BMSDC have decided should be allocated in the JLP, taking into account the findings of the SA and other evidence.
- Reasonable alternatives – these are sites that do not have planning consent, and which BMSDC has decided not to allocate in the JLP taking into account the findings of the SA and other evidence.

**6.19** A brief commentary of the findings is provided, plus observations on the scope for mitigation.

**6.20** Summary tables of the significance scores for all the reasonable residential sites and the reasonable employment sites follow each section respectively, together with some overall comments.

**6.21** It should be noted that the findings of the SA are only one factor that BMSDC took into account when deciding which sites to allocate in the JLP. The SA is only one part of the evidence base. There may be other evidence, such as technical studies and assessments, and consultation responses from statutory consultees, service providers and utilities, land promoters and the public, that are taken into account in coming to decisions. The reasons for BMSDC deciding which site to allocate and which to discount are provided in **Appendix G (Reason for Selecting or Rejecting Site Options)**.

## Residential sites

**6.22** The residential sites that were subject to SA are shown in **Figures 6.1 and 6.2**, indicating which sites are already committed (i.e. have planning consent) and therefore automatically allocated, which sites are allocated that are not yet committed (i.e. do not yet have planning consent), and which sites were discounted by BMSDC for inclusion as allocations in the JLP.

**6.23** **Tables 6.1 and 6.2** show the numbers of sites appraised for each settlement hierarchy category for each District, as well as the total dwelling yield of those sites and the average site size.

**6.24** It can be seen from these tables that 60% more sites were subject to SA in Mid Suffolk than in Babergh. The housing supply requirement in Mid Suffolk is nearly a third higher than in Babergh.

**6.25** With the exception of the Ipswich Policy Area, the average dwelling number of the sites for each JLP settlement hierarchy category were similar in both Districts. In the Ipswich Policy Area, the dwelling yield for sites in Babergh was almost double that for Mid Suffolk, although the number of sites appraised in Each District was relatively small.

**Table 6.1: Summary of reasonable residential sites subject to SA in Babergh**

JLP settlement hierarchy category	Number of sites subject to SA	Total dwelling yield	Average dwelling yield
Ipswich Policy Area	13	2,932	226
Market Towns and Urban Areas	20	2,437	122
Core Villages	21	1,731	82
Hinterland Villages	29	518	18
Hamlets and the Countryside	17	201	12
<b>Total</b>	<b>100</b>	<b>7,819</b>	<b>78</b>

**Table 6.2: Summary of reasonable residential sites subject to SA in Mid Suffolk**

JLP settlement hierarchy category	Number of sites subject to SA	Total dwelling yield	Average dwelling yield
Ipswich Policy Area	13	21,493	115
Market Towns and Urban Areas	26	3,546	133
Core Villages	50	4,092	82
Hinterland Villages	42	794	19
Hamlets and the Countryside	28	315	11
<b>Total</b>	<b>159</b>	<b>10,240</b>	<b>64</b>

**6.26** The findings of the SA of residential sites are presented below. The detailed appraisal findings can be found in **Appendix E (Detailed Appraisal of Site Options)**.

**SA Objective 1: To maintain the health and wellbeing of the population overall and reduce health inequalities**

**Significant positive effects**

Significant positive effect (++)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	SS0182	Land south of Heath Road	75	East Bergholt	Core Village
	SS0251*	Land east of Longfield Road	100	Capel St Mary	Core Village
	SS0502	Angel Court, Angel Street	21	Hadleigh	Urban Area/Market Town
	SS0717*	Land east of Ipswich Road	7	Holbrook	Core Village
	SS0812	Land east of the B1064	150	Long Melford	Core Village
	SS1020*	Land west of Bourne Hill	75	Wherstead	Ipswich Policy Area
Allocated sites	SS0191*	Land north of the A1071	475	Sproughton	Ipswich Policy Area
	SS0208*	Land south of The Street	50	Shotley	Core Village
	SS0278	Land south of Wattisham Road	75	Bildeston	Core Village
	SS0537	Former Babergh District Council Offices	50	Hadleigh	Urban Area/Market Town
	SS0754*	Claypits Avenue (Garages)	5	Bures St Mary	Core Village
	SS0910*	Land south-west of Rembrow Road	520	Capel St Mary	Core Village
Reasonable alternative	SS0286*	Land south of Kings Road	100	Glemsford	Core Village
	SS0292	Land west of Sand Hill	60	Boxford	Core Village
	SS0418*	Land south-east of Benton Street	15	Hadleigh	Urban Area/Market Town
	SS0509	Land north of Newton Road	12	Sudbury	Urban Area/Market Town
	SS0745	Elm Road/Chilton Lodge Road	5	Sudbury	Urban Area/Market Town
	SS0909*	Land west of Aldham Mill Hill and east of Gallows Hill	80	Hadleigh	Urban Area/Market Town
	SS1110*	Land west of Duffs Hill	25	Glemsford	Core Village
	SS1185*	Land to the south of Poplar Lane	150	Sproughton	Ipswich Policy Area
Mid Suffolk District					
Allocated sites that are committed	SS0058	Land between Oatfields and Stradbroke Road	18	Fressingfield	Hinterland Village
	SS0088	Former Bacton Middle School	50	Bacton	Core Village
	SS0093	Land east of Green Road	49	Woolpit	Core Village
	SS0129*	Land south of Back Hills	40	Botesdale & Rickinghall	Core Village

Significant positive effect (++)					
	SS0266	Land north of Church Road and east of Wyverstone Road	81	Bacton	Core Village
	SS0518*	Land south of Pretyman Avenue	85	Bacton	Core Village
	SS0547	Land south of Old Stowmarket Road	120	Woolpit	Core Village
	SS0669	Former Needham Market Middle School	41	Needham Market	Urban Area/Market Town
	SS0949	Land north of Mill Road	69	Botesdale & Rickinghall	Core Village
	SS1043	Land south of New Street	60	Stradbroke	Core Village
Allocated sites	SS0031	Land north of Ipswich Road	140	Debenham	Core Village
	SS0065*	Land south of Glebe Way	75	Mendlesham	Core Village
	SS0076	Land north of Church Lane	270	Barham	Ipswich Policy Area
	SS0079*	Land west of Queen Street	75	Stradbroke	Core Village
	SS0101	Former Stowmarket Middle School	40	Stowmarket	Urban Area/Market Town
	SS0264*	Ashes Farm	575	Stowmarket	Urban Areas/Market Town
	SS0268	Land east of Aspoll Road	87	Debenham	Core Village
	SS0615*	Land at allotments north of Millfield	72	Eye	Urban Area/Market Town
	SS0670	Land north-east of The Street	500	Woolpit	Core Village
	SS0681	Land east of Farriers Close	35	Stradbroke	Core Village
	SS0783*	Land west of Heath Road	30	Woolpit	Core Village
	SS0861*	Land south of Church Lane	75	Claydon	Ipswich Policy Area
	SS0902	Land south of Low Road	18	Debenham	Core Village
	SS1118*	Land north of Magdalen Street	80	Eye	Urban Area/Market Town
Reasonable alternatives	SS0014	Land north of Maple Way	150	Eye	Urban Area/Market Town
	SS0028	Land north of Barking Road	300	Needham Market	Urban Area/Market Town
	SS0267*	Land north of Gracechurch Street	150	Debenham	Core Village
	SS0575	Land east of Queen Street	30	Stradbroke	Core Village
	SS0642*	Land to the north of Low Road	250	Debenham	Core Village
	SS0673	Land north-east of Heath Road	10	Woolpit	Core Village
	SS0859	Land south of Church Road	50	Bacton	Core Village
	SS1070	Land east of Barking Road	120	Barking	Urban Area/Market Town
	SS1248	Land south of Mill Road	25	Botesdale	Core Village

\*denotes that effect is recorded as uncertain

**6.27** A high number of allocated sites that are committed and allocated sites that are not yet committed have received a significant positive effect in the significance scoring against SA Objective 1 (To improve the health and wellbeing of the population overall and reduce health inequalities) when compared to the reasonable alternatives. These sites perform more strongly than other sites because they are located within desirable walking distance of healthcare facilities, open space, sport and recreation facilities, and Public Rights of Way. Therefore, people living at these sites are expected to have good access to GP surgeries, whilst also being located within close proximity to open spaces and sports and recreation facilities, which encourage physical activity with positive

effects on health and wellbeing. Indeed, almost all of the sites that scored a significant positive effect against this objective, scored a major positive effect in relation to criterion 1b (Open space, sport and recreation) because they are located within desirable walking distance of an open space, sport and/or recreation facility, in addition to open country and/or registered common land. People may also be encouraged to walk more regularly, with easy access to the footways network. A small number of sites have uncertainty recorded against this effect because they contain a Public Right of Way and it is unknown whether the Public Right of Way will be lost or diverted as a result of development.

### Significant negative effects

Significant negative effect (--)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	N/A	N/A	N/A	N/A	N/A
Reasonable alternative	N/A	N/A	N/A	N/A	N/A
Mid Suffolk District					
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	SS0573	Land south of Church Road	5	Worlingworth	Hamlet/Countryside

Significant negative effect (-)					
Reasonable alternatives	N/A	N/A	N/A	N/A	N/A

**6.28** Only one site (SS0573: Land south of Church Road, Worlingworth) across both Districts is expected to have a significant negative effect against SA Objective 1 (To improve the health and wellbeing of the population overall and reduce health inequalities). This is due to the fact the site, which is located in Mid Suffolk District, is located beyond the preferred maximum walking distance to a primary healthcare facility and an open space, sport and recreation facility. It is located within the preferred maximum walking distance of a Public Right of Way. The site has been allocated in the JLP due to the fact it is well related to the existing settlement of Worlingworth.

**Possible mitigation**

**6.29** For sites with a significant effect, mitigation could be provided by the development of a new healthcare facility, and open space, sport and recreation facilities. The creation of new Public Rights of Way is also a possibility. However, although financial contributions could be made, it is likely that only larger sites would be likely to deliver such mitigation.

**SA Objective 2: To maintain and improve levels of education and skills in the population overall**

**Significant positive effects**

Significant positive effect (++)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	SS0433	Land west of Bures Road	46	Great Cornard	Urban Area/Market Town
	SS0717	Land east of Ipswich Road	7	Holbrook	Core Village
Allocated sites	SS0242	Land at Tye Farm	500	Great Cornard	Urban Area/Market Town
	SS0298	Land north-east of Frog Hall Lane	600	Hadleigh	Urban Area/Market Town
Reasonable alternative	SS0303	Land east of Frog Hall Lane	300	Hadleigh	Urban Area/Market Town
	SS1283	Land to the north of St Bartholomew's Chapel	350	Long Melford	Urban Area/Market Town
Mid Suffolk District					
Allocated sites that are committed	SS0019	Land west of Meadow Lane	64	Thurston	Core Village
	SS0029 <sup>10</sup>	Land south of Union Road	300	Onehouse	Urban Area/Market Town
	SS0151	Land south of Church Road	18	Stowupland	Core Village
	SS0765	Land to the West of Church Road	15	Thurston	Core Village
	SS1043	Land south of New Street	60	Stradbroke	Core Village
Allocated sites	SS0079	Land west of Queen Street	75	Stradbroke	Core Village
	SS0101	Former Stowmarket Middle School	40	Stowmarket	Urban Area/Market Town
	SS0268	Land east of Aspell Road	87	Debenham	Core Village
	SS0672	Land north of Church Street	12	Eye	Urban Area/Market Town
	SS0681	Land east of Farriers Close	35	Stradbroke	Core Village
	SS0861	Land south of Church Lane	75	Claydon	Ipswich Policy Area
	SS1071	Land south of Stowmarket Road	300	Stowupland	Urban Area/Market Town

<sup>10</sup> Site SS0029 was allocated in the Stowmarket Area Action Plan (2013).

Significant positive effect (++)					
	SS1118	Land north of Magdalen Street	80	Eye	Urban Area/Market Town
Reasonable alternatives	SS0087	Land south of Ash Plough and west of Queen Street	20	Stradbroke	Core Village
	SS0267	Land north of Gracechurch Street	150	Debenham	Core Village
	SS0575	Land east of Queen Street	30	Stradbroke	Core Village
	SS1106	Land south of Gipping Road	100	Stowupland	Core Village
	SS1239	Land east of Old Ipswich Road	250	Claydon	Ipswich Policy Area

**6.30** A small number of allocated sites that are committed and allocated sites that are not yet committed have received a significant positive effect in the significance scoring against SA Objective 2 (To maintain and improve levels of education and skills). There is also a small number of reasonable alternatives that receive a significant positive effect. These sites perform more strongly than others because they are located within desirable walking distance of primary schools and secondary

schools. Indeed, around three quarters of the sites are located within desirable walking distance of a primary school, whilst over half but less than three quarters of the sites are located within desirable walking distance of a secondary school. Weight has not been given to further and higher education facilities in the significance scoring against this objective as primary and secondary schools are considered the main determinants of access to education.

#### Significant negative effects

Significant negative effect (--)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	SS0259	Land west of Hadleigh Road	7	Aldham	Hamlet/Countryside
	SS0392	Land west of A137, The Heath	5	Tattingstone	Hamlet/Countryside
	SS0517	Land south-east of Duke Street	6	Hintlesham	Hinterland Village
	SS0591	6 Acre Field	14	Belstead	Ipswich Policy Area
	SS0628	Land to north of Ipswich Road	9	Nedging-with-Naughton	Hinterland Village
	SS0685	Land west of Melford Road	5	Lawshall	Hinterland Village
	SS0880	Land east of The Street	24	Raydon	Hinterland Village
	SS1289	Land north of MacKenzie Place	51	Cockfield	Hamlet/Countryside
	SS1290	Land east of Bury Road	10	Cockfield	Hamlet/Countryside
Allocated sites	SS0203	Land south of Main Road	5	Woolverstone	Hamlet/Countryside
	SS0222	Land west of The Causeway	12	Hitcham	Hinterland Village
	SS0255	Land north of Glebe Lane and west of Main Road	5	Woolverstone	Hamlet/Countryside
	SS0258	Land north of The Street	5	Aldham	Hamlet/Countryside

Significant negative effect (--)					
	SS0288	Land north-west of Melford Road	20	Lavenham	Core Village
	SS0403	Land south of Hadleigh Road, Calais Street	5	Boxford	Hamlet/Countryside
	SS0507	Council Depot	6	Wenham Magna	Hamlet/Countryside
	SS0512	Land east of Upper Street	8	Stanstead	Hamlet/Countryside
	SS0587	Land south of High Road	40	Leavenheath	Hamlet/Countryside
	SS0593	Land south-west of London Road	12	Copdock and Washbrook	Ipswich Policy Area
	SS0682	Land east of Bury Road	15	Lawshall	Hinterland Village
	SS0752	Land Adjacent to the B1070	12	Holton St Mary	Hamlet/Countryside
	SS0877	Land north of Woodlands Road	10	Raydon	Hinterland Village
	SS0954	Land to the west of Hadleigh Road	25	Sproughton	Ipswich Policy Area
	SS1148	Land east of The Tye	5	Lindsey	Hamlet/Countryside
Reasonable alternative	SS0226	Land south-east of George Lane, Glemsford	50	Glemsford	Core Village
	SS0237	Land west of Bury Road, Lawshall	10	Lawshall	Hinterland Village
	SS0395	Land south of Station Road and west of Bergholt Road	60	Bentley	Hinterland Village
	SS0503	Land north-east of Valley View	5	Stanstead	Hamlet/Countryside
	SS0620	Land west of London Road	25	Copdock and Washbrook	Ipswich Policy Area
	SS0685	Land west of Melford Road	5	Lawshall	Hinterland Village
	SS0690	Land south of Lambs Lane	10	Lawshall	Hinterland Village
	SS0874	Land to the south-east of The Street	12	Little Waldingfield	Hamlet/Countryside
	SS1018	Land to the west of A1141	10	Cockfield	Hamlet/Countryside
	SS1044	Land east of Bergholt Road	20	Bentley	Hinterland Village
	SS1060	Land west of Noaks Road	6	Raydon	Hinterland Village
	SS1205	Land west of Rodbridge Hill	30	Long Melford	Core Village
	SS1238	Land south of The Street	10	Harkstead	Hamlet/Countryside
	SS1257	Land south of Hadleigh Road	5	Boxford	Core Village
Mid Suffolk District					
Allocated sites that are committed	SS0012	Land north of Falconer Avenue	56	Old Newton	Hinterland Village
	SS0020	Land south of The Broadway	13	Badwell Ash	Hinterland Village
	SS0037	Land west of The Street	21	Badwell Ash	Hinterland Village
	SS0078	Land south-east of Hunston Road	52	Badwell Ash	Hinterland Village
	SS0110	Land east of The Street	8	Wattisfield	Hamlet/Countryside

Significant negative effect (-)					
	SS0453	Land north of Stoke Road and west of Clint Road	20	Thorndon	Hinterland Village
	SS0478	Land east of The Street	190	Bramford	Ipswich Policy Area
	SS0612	Land east of Bowl Road and north-west of Cobbold Close	9	Battisford	Hamlet/Countryside
	SS0736	Land north of Tostock Road	9	Beyton	Hinterland Village
	SS0818	Land south of B1113 Hall Lane, opposite junction with Half Moon Lane	9	Redgrave	Hinterland Village
	SS1056	Land north of Pesthouse Lane	20	Barham	Ipswich Policy Area
	SS1199	Land west of Stowmarket Road	66	Needham Market	Urban Area/Market Town
	SS1292	Land north of The Broadway	33	Badwell Ash	Hinterland Village
	SS1293	Land south of Great Bricett Business Park	51	Great Bricett	Hamlet/Countryside
Allocated sites	SS0038	Land east of Old Ipswich Road	15	Yaxley	Hinterland Village
	SS0039	Land north of Church Road	60	Elmswell	Core Village
	SS0042	Land west of Old Ipswich Road	20	Yaxley	Hinterland Village
	SS0054	Land north-east of The Street	15	Weybread	Hamlet/Countryside
	SS0084	Land north of The Street	10	Westhorpe	Hamlet/Countryside
	SS0127	Land west of Jacks Green Road	5	Creting St Mary	Urban Area/Market Town
	SS0132	Land west of Station Road	100	Elmswell	Core Village
	SS0163	Land east of Norwich Road	5	Stonham Parva	Hinterland Village
	SS0380	Land south of Wickham Road	10	Finningham	Hinterland Village
	SS0513	Land between New Road and Leys Road	5	Tostock	Hinterland Village
	SS0542	Land south of the B1118	5	Brome & Oakley	Hinterland Village
	SS0558	Land to the south of Long Thurlow Road	10	Badwell Ash	Hamlet/Countryside
	SS0570	Land east of A140 The Street	10	Wetheringsett	Hamlet/Countryside
	SS0603	Land north of Barking Road and west of Hascot Hill	10	Barking	Hinterland Village
	SS0654	Land south of Chalk Hill Lane and West of Hood Drive	8	Great Blakenham	Ipswich Policy Area
	SS0678	Land south of Hubbard's Lane and east of The Green	5	Hessett	Hinterland Village
	SS0706	Land to the west of Debenham Way	10	Pettaugh	Hamlet/Countryside
	SS0723	Land to the west of The Street	8	Stoke Ash	Hamlet/Countryside
SS0786	Land to the south of Wickham Road and west of A140	10	Thwaite	Hinterland Village	

Significant negative effect (--)					
	SS0796	Land to the west of B1077	15	Ashbocking	Hamlet/Countryside
	SS0810	Land west of Norwich Road	5	Stonham Parva	Hinterland Village
	SS0814	Land north of Long Thurlow Road	5	Badwell Ash	Hamlet/Countryside
	SS0849	Land west Gislingham Road	10	Finningham	Hinterland Village
	SS0863	Land north of B1123	25	Metfield	Hinterland Village
	SS0869	Land west of Bildeston Road	5	Combs	Hinterland Village
	SS1011	Land north of B1118	10	Brome & Oakley	Hinterland Village
	SS1058	Land north east of Haggars Mead	20	Stonham Earl	Hinterland Village
	SS1065	Land west of Church Road	10	Beyton	Hinterland Village
	SS1166	Land west of Grange Road	5	Wickham Skeith	Hamlet/Countryside
	SS1188	Land north of Mendlesham Road	5	Cotton	Hamlet/Countryside
	SS1228	Land west of Church Lane	5	Thwaite	Hinterland Village
Reasonable alternatives	SS0091	Land between The Street and A143	100	Botesdale & Rickinghall	Core Village
	SS0735	Land south of Church Road	10	Westhorpe	Hamlet/Countryside
	SS0806	Land north-east of Mill Hill	15	Cotton	Hamlet/Countryside
	SS0809	Land north of Long Thurlow Road	10	Badwell Ash	Hamlet/Countryside
	SS0815	Land south of The Street	5	Hunston	Hamlet/Countryside
	SS1153	Land south-west of Stowmarket Road	134	Needham Market	Urban Area/Market Town
	SS1187	Land east of Stonham Road	10 <sup>11</sup>	Cotton	Hamlet/Countryside
	SS1189	Land east of Eye Road and north of Church Close	10 <sup>12</sup>	Kenton	Hamlet/Countryside
	SS1266	Land south of Half Moon Lane	15	Redgrave	Hinterland Village
	SS1268	Land east of School Lane	8	Coddenham	Hinterland Village

**6.31** A large number of both allocated and reasonable alternative sites receive significant negative effects against SA Objective 2 (To maintain and improve levels of education and skills). These sites perform poorly against SA Objective 2 because they are located beyond the preferred maximum walking distance to primary and secondary schools, which are considered the main determinants of access to education.

**6.32** Almost all of the sites are located beyond the preferred maximum walking distance to a secondary school, whilst around three quarters of the sites are located beyond the

preferred maximum walking distance of a primary school. Therefore, residents at these sites would have relatively poor access to education.

#### Possible mitigation

**6.33** It is difficult to mitigate the distance of a residential site from schools, without developing new schools that are within or closer to the residential site. Realistically, it is unlikely that new schools will be developed unless the residential site is of a large enough scale to justify the development of a new

<sup>11</sup> Based on an assumed density basis.

<sup>12</sup> Based on an assumed density basis.

school. A residential site would need to include several thousand dwellings to support a new secondary school. There is a possibility that a number of smaller residential sites could combine in one settlement to create enough demand for a new school, but in most instances this is unlikely, given the small scale of the reasonable alternative residential sites concerned. Nonetheless, financial contributions could be made to provide additional investment in the capacity of existing schools.

**SA Objective 3: To reduce poverty and social exclusion and ensure access to jobs and services**

**Significant positive effects**

Significant positive effect (++)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	SS0299	Land at Poplar Lane	475	Sproughton	Ipswich Policy Area
	SS1020	Land west of Bourne Hill	75	Wherstead	Ipswich Policy Area
	SS1082	Land east of Kings Hill	8	Great Cornard	Urban Area/Market Town
	SS1121	Land north-west of Waldingfield Road	130	Chilton	Urban Area/Market Town
Allocated sites	SS0191	Land north of the A1071	475	Sproughton	Ipswich Policy Area
	SS0242	Land at Tye Farm	500	Great Cornard	Urban Area/Market Town
	SS0298	Land north-east of Frog Hall Lane	600	Hadleigh	Urban Area/Market Town
	SS0584	Land north of Red Hill Road/ Malyon Road	75	Hadleigh	Urban Area/Market Town
	SS1024	Land north of the A1071	300	Sproughton	Ipswich Policy Area
Reasonable alternative	SS0509	Land north of Newton Road	12	Sudbury	Urban Area/Market Town
	SS0590	Land east of Waldringfield Road and north of Church Field Road	25	Chilton	Urban Area/Market Town
	SS0745	Elm Road/Chilton Lodge Road	5	Sudbury	Urban Area/Market Town
	SS0750	Second Avenue (Garages)	5	Sudbury	Urban Area/Market Town
	SS0909	Land west of Aldham Mill Hill and east of Gallows Hill	80	Hadleigh	Urban Area/Market Town
	SS1177	Land north of Sproughton Road	1,000	Sproughton	Ipswich Policy Area
	SS1185	Land to the south of Poplar Lane	150	Sproughton	Ipswich Policy Area
	SS1283	Land to the north of St Bartholomew's Chapel	350	Long Melford	Urban Area/Market Town
Mid Suffolk District					
Allocated sites that are committed	SS0033	Land west of Old Norwich Road	190	Whitton	Ipswich Policy Area
	SS0064	Land south of Gun Cotton Way	68	Stowmarket	Urban Area/Market Town
	SS0636	Land between Bramford Road and the A14	14	Bramford	Ipswich Policy Area
	SS1288	Land east and west of Prentice Road	60	Stowmarket	Urban Area/Market Town
Allocated sites	SS0264	Ashes Farm	575	Stowmarket	Urban Area/Market Town
	SS0614	Land north of Millfield	34	Eye	Urban Area/Market Town
	SS0668	Land south of Creting Road West	25	Stowmarket	Urban Area/Market Town

Significant positive effect (++)					
Reasonable alternatives	SS1202	Land south of Eye Airfield	174	Eye	Urban Area/Market Town
	SS0864	Land north of Gipping Road	20	Great Blakenham	Ipswich Policy Area
	SS0952	Land south of Gipping Road	10	Great Blakenham	Ipswich Policy Area
	SS1070	Land east of Barking Road	120	Barking	Urban Area/Market Town

**6.34** A number of allocated sites that are committed and allocated sites that are not yet committed have received a significant positive effect in the significance scoring against SA Objective 3 (To reduce poverty and social exclusion and ensure access to jobs and services). A number of the reasonable alternative sites also would have a significant positive effect.

**6.35** These sites perform more strongly than other sites because they perform well against at least two of three assessment criteria. They may fall within deprived areas within the JLP area and therefore have potential to regenerate these areas. They may be located within or adjacent to settlements towards the top of the settlement hierarchy where accessibility to jobs and services is good. The sites may also be located within close proximity of strategic employment sites/enterprise

zones and therefore provide residents with good accessibility to employment opportunities.

**6.36** All sites that scored a significant positive effect against SA Objective 3, have a major positive effect against criterion 3b (Settlement hierarchy) because they are either located within the Ipswich Fringe or a Market Town/Urban Area. All of the sites, with the exception of SS0033 (Land west of Old Norwich Road, Whitton), scored a major positive effect against criterion 3c (Centres of employment) because they are located within close proximity to a centre of employment. However, site SS0033 was the only site to score a major positive effect against criterion 3a (IMD) because it falls within one of the 20% most deprived areas within the JLP area and its development may therefore help regenerate the area.

### Significant negative effects

Significant negative effect (--)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	SS0259	Land west of Hadleigh Road	7	Aldham	Hamlet/Countryside
	SS0392	Land west of A137, The Heath	5	Tattingstone	Hamlet/Countryside
	SS0628	Land to north of Ipswich Road	9	Nedging-with-Naughton	Hinterland Village
	SS0683	Land to the south-west of Harrow Green	5	Lawshall	Hinterland Village
	SS1289	Land north of MacKenzie Place	51	Cockfield	Hamlet/Countryside
	SS1290	Land east of Bury Road	10	Cockfield	Hamlet/Countryside
Allocated sites	SS0203	Land south of Main Road	5	Woolverstone	Hamlet/Countryside
	SS0255	Land north of Glebe Lane and west of Main Road	5	Woolverstone	Hamlet/Countryside
	SS0258	Land north of The Street	5	Aldham	Hamlet/Countryside
	SS0403	Land south of Hadleigh Road, Calais Street	5	Boxford	Hamlet/Countryside
	SS0512	Land east of Upper Street	8	Stanstead	Hamlet/Countryside

Significant negative effect (--)					
	SS0587	Land south of High Road	40	Leavenheath	Hamlet/Countryside
	SS0682	Land east of Bury Road	15	Lawshall	Hinterland Village
	SS0752	Land Adjacent to the B1070	12	Holton St Mary	Hamlet/Countryside
	SS1148	Land east of The Tye	5	Lindsey	Hamlet/Countryside
Reasonable alternative	SS0237	Land west of Bury Road	10	Lawshall	Hinterland Village
	SS0503	Land north-east of Valley View	5	Stanstead	Hamlet/Countryside
	SS0685	Land west of Melford Road	5	Lawshall	Hinterland Village
	SS0690	Land south of Lambs Lane	10	Lawshall	Hinterland Village
	SS1018	Land to the west of A1141	10	Cockfield	Hamlet/Countryside
	SS1238	Land south of The Street	10	Harkstead	Hamlet/Countryside
Mid Suffolk District					
Allocated sites that are committed	SS0110	Land east of The Street	8	Wattisfield	Hamlet/Countryside
	SS0358	Land north of Top Road	8	Rattlesden	Hamlet/Countryside
	SS0500	Land east of Mitchery Lane	22	Rattlesden	Hamlet/Countryside
	SS0612	Land east of Bowl Road and north-west of Cobbold Close	9	Battisford	Hamlet/Countryside
	SS1088	Land north of Ashfield Road	8	Norton	Hamlet/Countryside
	SS1293	Land south of Great Bricett Business Park	51	Great Bricett	Hamlet/Countryside
	SS1294	Land south of Shop Street	26	Worlingworth	Hamlet/Countryside
Allocated sites	SS0084	Land north of The Street	10	Westhorpe	Hamlet/Countryside
	SS0542	Land south of the B1118	5	Brome & Oakley	Hinterland Village
	SS0558	Land to the south of Long Thurlow Road	10	Badwell Ash	Hamlet/Countryside
	SS0573	Land south of Church Road	5	Worlingworth	Hamlet/Countryside
	SS0706	Land to the west of Debenham Way	10	Pettaugh	Hamlet/Countryside
	SS0796	Land to the west of B1077	15	Ashbocking	Hamlet/Countryside
	SS0814	Land north of Long Thurlow Road	5	Badwell Ash	Hamlet/Countryside
	SS1011	Land north of B1118	10	Brome & Oakley	Hinterland Village
	SS1166	Land west of Grange Road	5	Wickham Skeith	Hamlet/Countryside
	SS1188	Land north of Mendlesham Road	5	Cotton	Hamlet/Countryside
Reasonable alternatives	SS0735	Land south of Church Road	10	Westhorpe	Hamlet/Countryside
	SS0806	Land north-east of Mill Hill	15	Cotton	Hamlet/Countryside
	SS0809	Land north of Long Thurlow Road	10	Badwell Ash	Hamlet/Countryside

Significant negative effect (--)					
	SS0815	Land south of The Street	5	Hunston	Hamlet/Countryside
	SS0825	Land west of B1118	5	Wilby	Hamlet/Countryside
	SS1187	Land east of Stonham Road	10 <sup>13</sup>	Cotton	Hamlet/Countryside
	SS1189	Land east of Eye Road and north of Church Close	10 <sup>14</sup>	Kenton	Hamlet/Countryside
	SS1278	Land to the south of Willow Farm	5	Wilby	Hamlet/Countryside
	SS1279	Land to the west of Brundish Road	5	Wilby	Hamlet/Countryside

**6.37** There are a large number of both allocated sites that are committed and the allocated sites that receive significant negative effects against SA Objective 3 (To reduce poverty and social exclusion and ensure access to jobs and services).

**6.38** All of the sites that scored a significant negative effect against this objective, scored a major negative effect in relation to criteria 3b (Settlement hierarchy) and 3c (Centres of employment). This is due to the fact they are all located within or adjacent to a settlement at the bottom of the settlement hierarchy (a hamlet village or any other rural area) and are also located beyond the preferred maximum walking distance to a strategic employment site/enterprise zone. Therefore, people would not have easy access to job opportunities, and the services/facilities typically found in a larger, urban settlement.

#### Possible mitigation

**6.39** Mitigation for significant negative effects in relation to SA Objective 3 is difficult. Given that the sites that perform less well are all located in smaller settlements it is unlikely that they will be where new strategic employment sites are allocated and the range of jobs and services are likely to remain limited and localised.

**6.40** However, given that most of the sites that result in significant negative effects, both allocated and reasonable alternatives, are relatively small (i.e. around 50 dwellings or fewer, with the majority less than 20 dwellings), this scale of development may be appropriate to meet local needs for these smaller settlements, and help to support the viability of local services and facilities.

<sup>13</sup> Based on an assumed density basis.

<sup>14</sup> Based on an assumed density basis.

**SA Objective 4: To meet the housing requirements of the whole community**

**Significant positive effects**

Significant positive effect (++)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	SS0179	Land east of Church Road	34	Stutton	Hinterland Village
	SS0181	Land north-west of Moores Lane	144	East Bergholt	Core Village
	SS0182	Land south of Heath Road	75	East Bergholt	Core Village
	SS0212	Land west of Hadleigh Road	41	Elmsett	Hinterland Village
	SS0259	Land west of Hadleigh Road	7	Aldham	Hamlet/Countryside
	SS0299	Land at Poplar Lane	475	Sproughton	Ipswich Policy Area
	SS0392	Land west of A137, The Heath	5	Tattingstone	Hamlet/Countryside
	SS0433	Land west of Bures Road	46	Great Cornard	Urban Area/Market Town
	SS0517	Land south-east of Duke Street	6	Hintlesham	Hinterland Village
	SS0591	6 Acre Field	14	Belstead	Ipswich Policy Area
	SS0628	Land to north of Ipswich Road	9	Nedging-with-Naughton	Hinterland Village
	SS0683	Land to the south-west of Harrow Green	5	Lawshall	Hinterland Village
	SS0696	Land north of Holbrook Road	6	Stutton	Hinterland Village
	SS0880	Land east of The Street	24	Raydon	Hinterland Village
	SS1020	Land west of Bourne Hill	75	Wherstead	Ipswich Policy Area
	SS1125	Land north of Manningtree Road	14	Stutton	Hinterland Village
	SS1289	Land north of MacKenzie Place	51	Cockfield	Hamlet/Countryside
SS1290	Land east of Bury Road	10	Cockfield	Hamlet/Countryside	
Allocated sites	SS0185	Land south of Ipswich Road	125	Brantham	Core Village
	SS0191	Land north of the A1071	475	Sproughton	Ipswich Policy Area
	SS0208	Land south of The Street	50	Shotley	Core Village
	SS0222	Land west of The Causeway	12	Hitcham	Hinterland Village
	SS0223	Land north of Burstall Lane and West of B1113	105	Sproughton	Ipswich Policy Area
	SS0242	Land at Tye Farm	500	Great Cornard	Urban Area/Market Town
	SS0258	Land north of The Street	5	Aldham	Hamlet/Countryside
	SS0278	Land south of Wattisham Road	75	Bildeston	Core Village

Significant positive effect (++)					
	SS0295	Land south-east of Back Lane	226	Copdock and Washbrook	Ipswich Policy Area
	SS0403	Land south of Hadleigh Road, Calais Street	5	Boxford	Hamlet/Countryside
	SS0507	Council Depot	6	Wenham Magna	Hamlet/Countryside
	SS0587	Land south of High Road	40	Leavenheath	Hamlet/Countryside
	SS0593	Land south-west of London Road	12	Copdock and Washbrook	Ipswich Policy Area
	SS0682	Land east of Bury Road	15	Lawshall	Hinterland Village
	SS0711	Land east of Loraine Way	50	Sproughton	Ipswich Policy Area
	SS0752	Land Adjacent to the B1070	12	Holton St Mary	Hamlet/Countryside
	SS0754	Claypits Avenue (Garages)	5	Bures St Mary	Core Village
	SS0820	Land west of Church Lane	20	Bentley	Hinterland Village
	SS0877	Land north of Woodlands Road	10	Raydon	Hinterland Village
	SS0954	Land to the west of Hadleigh Road	25	Sproughton	Ipswich Policy Area
	SS1024	Land north of the A1071	300	Sproughton	Ipswich Policy Area
	SS1148	Land east of The Tye	5	Lindsey	Hamlet/Countryside
Reasonable alternative	SS0194	Land north of Folly Road	50	Great Waldingfield	Hinterland Village
	SS0211	Land west of Brantham Hill	50	Brantham	Core Village
	SS0220	Land south of Davidson Close	120	Great Cornard	Urban Area/Market Town
	SS0232	Land south of Whatfield Road	20	Elmsett	Hinterland Village
	SS0233	Land north-east of Ipswich Road	15	Elmsett	Hinterland Village
	SS0237	Land west of Bury Road	10	Lawshall	Hinterland Village
	SS0292	Land west of Sand Hill	60	Boxford	Core Village
	SS0395	Land south of Station Road and west of Bergholt Road	60	Bentley	Hinterland Village
	SS0620	Land west of London Road	25	Copdock and Washbrook	Ipswich Policy Area
	SS0644	Land south of Hadleigh Road	8	Elmsett	Hinterland Village
	SS0685	Land west of Melford Road	5	Lawshall	Hinterland Village
	SS0690	Land south of Lambs Lane	10	Lawshall	Hinterland Village
	SS0750	Second Avenue (Garages)	5	Sudbury	Urban Area/Market Town
	SS0874	Land to the south-east of The Street	12	Little Waldingfield	Hamlet/Countryside
SS0968	Highfield Mill	5	Sudbury	Urban Area/Market Town	
SS1018	Urban Area/Market Town	10	Cockfield	Hamlet/Countryside	

Significant positive effect (++)					
	SS1019	Land west of Ballingdon Hill and south of Sandy Lane	60	Sudbury	Urban Area/Market Town
	SS1044	Land east of Bergholt Road	20	Bentley	Hinterland Village
	SS1060	Land west of Noaks Road	6	Raydon	Hinterland Village
	SS1177	Land north of Sproughton Road	1,000	Sproughton	Ipswich Policy Area
	SS1185	Land to the south of Poplar Lane	150	Sproughton	Ipswich Policy Area
	SS1257	Land south of Hadleigh Road	5	Boxford	Core Village
	SS1283	Land to the north of St Bartholomew's Chapel	350	Long Melford	Urban Area/Market Town
Mid Suffolk District					
Allocated sites that are committed	SS0004	Land south of Bacton Road	98	Haughley	Core Village
	SS0009	Land between Jack's Green Road and A14	43	Creeting St Mary	Urban Area/Market Town
	SS0012	Land north of Falconer Avenue	56	Old Newton	Hinterland Village
	SS0020	Land south of The Broadway	13	Badwell Ash	Hinterland Village
	SS0029 <sup>15</sup>	Land south of Union Road	300	Onehouse	Urban Area/Market Town
	SS0037	Land west of The Street	21	Badwell Ash	Hinterland Village
	SS0040	Land west of Wattisfield Road	60	Walsham-le-Willows	Core Village
	SS0047	Land west of Fishponds Way	65	Haughley	Core Village
	SS0058	Land between Oatfields and Stradbroke Road	18	Fressingfield	Hinterland Village
	SS0073	Land north of B1115	143	Stowupland	Urban Area/Market Town
	SS0078	Land south-east of Hunston Road	52	Badwell Ash	Hinterland Village
	SS0085	Land east of Ashfield Road	106	Elmswell	Core Village
	SS0088	Former Bacton Middle School	50	Bacton	Core Village
	SS0110	Land east of The Street	8	Wattisfield	Hamlet/Countryside
	SS0129	Land south of Back Hills	40	Botesdale & Rickinghall	Core Village
	SS0131	Land south of Stowmarket Road	64	Old Newton	Hinterland Village
	SS0151	Land south of Church Road	18	Stowupland	Core Village
	SS0266	Land north of Church Road and east of Wyverstone Road	81	Bacton	Core Village
SS0270	Land north of Station Road	29	Haughley	Core Village	
SS0358	Land north of Top Road	8	Rattlesden	Hamlet/Countryside	

<sup>15</sup> Site SS0029 was allocated in the Stowmarket Area Action Plan (2013).

Significant positive effect (++)					
	SS0369	Land east of Wattisfield Road	22	Walsham-le-Willows	Core Village
	SS0453	Land north of Stoke Road and west of Clint Road	20	Thorndon	Hinterland Village
	SS0500	Land east of Mitchery Lane	22	Rattlesden	Hamlet/Countryside
	SS0550	Land east of Withersdale Road, opposite Mendham Primary School	6	Mendham	Hinterland Village
	SS0612	Land east of Bowl Road and north-west of Cobbold Close	9	Battisford	Hamlet/Countryside
	SS0716	Land west of Ixworth Road	250	Thurston	Core Village
	SS0736	Land north of Tostock Road	9	Beyton	Hinterland Village
	SS0818	Land south of B1113 Hall Lane, opposite junction with Half Moon Lane	9	Redgrave	Hinterland Village
	SS0860	Land to the east of Pear Tree Place	21	Great Finborough	Hinterland Village
	SS0949	Land north of Mill Road	69	Botesdale & Rickinghall	Core Village
	SS1022	Chilton Leys	600	Stowmarket	Urban Area/Market Town
	SS1056	Land north of Pesthouse Lane	20	Barham	Ipswich Policy Area
	SS1088	Land north of Ashfield Road	8	Norton	Hamlet/Countryside
	SS1292	Land north of The Broadway	33	Badwell Ash	Hinterland Village
	SS1294	Land south of Shop Street	26	Worlingworth	Hamlet/Countryside
Allocated sites	SS0038	Land east of Old Ipswich Road	15	Yaxley	Hinterland Village
	SS0042	Land west of Old Ipswich Road	20	Yaxley	Hinterland Village
	SS0054	Land north-east of The Street	15	Weybread	Hamlet/Countryside
	SS0065	Land south of Glebe Way	75	Mendlesham	Core Village
	SS0076	Land north of Church Lane	270	Barham	Ipswich Policy Area
	SS0084	Land north of The Street	10	Westhorpe	Hamlet/Countryside
	SS0127	Land west of Jacks Green Road	5	Creeting St Mary	Urban Area/Market Town
	SS0141	Land south of The Street	35	Stonham Aspal	Hinterland Village
	SS0145	Land west of Main Road	30	Somersham	Hinterland Village
	SS0157 <sup>16</sup>	Land south of Union Road	100	Onehouse	Urban Area/Market Town
	SS0163	Land east of Norwich Road	5	Stonham Parva	Hinterland Village
	SS0264	Ashes Farm	575	Stowmarket	Urban Area/Market Town
	SS0319	Land south of Heath Road	110	Thurston	Core Village

<sup>16</sup> Site SS0157 was allocated in the Stowmarket Area Action Plan (2013).

Significant positive effect (++)					
SS0343	Land south of Forest Road	10	Onehouse	Urban Area/Market Town	
SS0380	Land south of Wickham Road	10	Finningham	Hinterland Village	
SS0513	Land between New Road and Leys Road	5	Tostock	Hinterland Village	
SS0542	Land south of the B1118	5	Brome & Oakley	Hinterland Village	
SS0551	Land east of Norwich Road	325	Barham	Ipswich Policy Area	
SS0558	Land to the south of Long Thurlow Road	10	Badwell Ash	Hamlet/Countryside	
SS0570	Land east of A140 The Street	10	Wetheringsett	Hamlet/Countryside	
SS0573	Land south of Church Road	5	Worlingworth	Hamlet/Countryside	
SS0599	Land to the north-east of the junction between The Street and Cedars Hill	10	Wetheringsett	Hamlet/Countryside	
SS0603	Land north of Barking Road and west of Hascot Hill	10	Barking	Hinterland Village	
SS0654	Land south of Chalk Hill Lane and West of Hood Drive	8	Great Blakenham	Ipswich Policy Area	
SS0678	Land south of Hubbard's Lane and east of The Green	5	Hessett	Hinterland Village	
SS0698	Land to the south-west of Yaxley Road	5	Mellis	Hinterland Village	
SS0706	Land to the west of Debenham Way	10	Pettaugh	Hamlet/Countryside	
SS0723	Land to the west of The Street	8	Stoke Ash	Hamlet/Countryside	
SS0728	Land to the south of Denham Road	30	Hoxne	Hinterland Village	
SS0786	Land to the south of Wickham Road and west of A140	10	Thwaite	Hinterland Village	
SS0796	Land to the west of B1077	15	Ashbocking	Hamlet/Countryside	
SS0810	Land west of Norwich Road	5	Stonham Parva	Hinterland Village	
SS0814	Land north of Long Thurlow Road	5	Badwell Ash	Hamlet/Countryside	
SS0832	Land west of Main Road	45	Henley	Hinterland Village	
SS0849	Land west Gislingham Road	10	Finningham	Hinterland Village	
SS0861	Land south of Church Lane	75	Claydon	Ipswich Policy Area	
SS0863	Land north of B1123	25	Metfield	Hinterland Village	
SS0869	Land west of Bildeston Road	5	Combs	Hinterland Village	
SS1011	Land north of B1118	10	Brome & Oakley	Hinterland Village	
SS1021	Land south of Church Road	10	Old Newton	Hinterland Village	
SS1058	Land north east of Haggars Mead,	20	Stonham Earl	Hinterland Village	
SS1065	Land west of Church Road	10	Beyton	Hinterland Village	

Significant positive effect (++)					
	SS1071	Land south of Stowmarket Road	300	Stowupland	Urban Area/Market Town
	SS1166	Land west of Grange Road	5	Wickham Skeith	Hamlet/Countryside
	SS1188	Land north of Mendlesham Road	5	Cotton	Hamlet/Countryside
	SS1228	Land west of Church Lane	5	Thwaite	Hinterland Village
Reasonable alternatives	SS0028	Land north of Barking Road	300	Needham Market	Urban Area/Market Town
	SS0083	Land north-east of Chapel Road	50	Mendlesham	Core Village
	SS0105	Land between Ixworth Road and Hawes Lane	12	Norton	Hinterland Village
	SS0171	Land south of Ashbocking Road	20	Henley	Hinterland Village
	SS0735	Land south of Church Road	10	Westhorpe	Hamlet/Countryside
	SS0806	Land north-east of Mill Hill	15	Cotton	Hamlet/Countryside
	SS0809	Land north of Long Thurlow Road	10	Badwell Ash	Hamlet/Countryside
	SS0815	Land south of The Street	5	Hunston	Hamlet/Countryside
	SS0864	Land north of Gipping Road	20	Great Blakenham	Ipswich Policy Area
	SS0952	Land south of Gipping Road	10	Great Blakenham	Ipswich Policy Area
	SS1055	Land west of High Road	25	Great Finborough	Hinterland Village
	SS1070	Land east of Barking Road	120	Barking	Urban Area/Market Town
	SS1106	Land south of Gipping Road	100	Stowupland	Core Village
	SS1153	Land south-west of Stowmarket Road	134	Needham Market	Urban Area/Market Town
	SS1187*	Land east of Stonham Road	10 <sup>17</sup>	Cotton	Hamlet/Countryside
	SS1189*	Land east of Eye Road and north of Church Close	10 <sup>18</sup>	Kenton	Hamlet/Countryside
	SS1248	Land south of Mill Road	25	Botesdale	Core Village
	SS1266	Land south of Half Moon Lane	15	Redgrave	Hinterland Village
SS1268	Land east of School Lane	8	Coddenham	Hinterland Village	

\*denotes that effect is recorded as uncertain

**6.41** A large number of sites receive a significant positive effect against SA Objective 4 (To meet the housing requirements of the whole community) because they significantly contribute towards the delivery of housing in the JLP area.

**6.42** Three of the sites that are committed and allocated and seven of the sites that are allocated but not committed score major positive effects against both criterion 4a (Housing

provision) because they provide 250 dwellings or more and criterion 4b (Located within one of the 20% most deprived areas with regard to the 'Barriers to housing and Services' domain of the English Indices of Deprivation). Only three of the reasonable alternative sites perform as well, being SS1177 (Land north of Sproughton Road, Sproughton), SS1283 (Land to the north of St Bartholomew's Chapel,

<sup>17</sup> Based on an assumed density basis.

<sup>18</sup> Based on an assumed density basis.

Sudbury), and SS0028 (Land north of Barking Road, Needham Market).

**6.43** All the other sites that receive significant positive effects do so because they have a major positive effect against criterion 4b (Located within one of the 20% most deprived areas with regard to the 'Barriers to housing and Services'), and a minor positive effect against criterion 4a (Housing provision). The only exception to this is site SS0716 (Land west of Ixworth Road, Thurston) because it receives a major positive effect against a criterion 4a and a minor positive effect against criterion 4b.

**6.44** Although there are a number of reasonable alternative sites that receive significant positive scores against SA Objective 4, there are 36 sites that are allocated that do not have planning consent that only receive minor positive significance scores.

#### Significant negative effects

**6.45** Under the site appraisal methodology, it is not possible for any site to score a significant negative effect against SA Objective 4 (To meet the housing requirements of the whole community) because they all contribute towards housing provision in the JLP area.

#### Possible mitigation

**6.46** None required.

**SA Objective 5: To conserve and enhance water quality and resources**

**Significant positive effects**

**6.47** Under the site appraisal methodology, it is not possible for any site to score a significant positive effect against SA

Objective 5 (To conserve and enhance water quality and resources).

**Significant negative effects**

Significant negative effect (-)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	SS0181	Land north-west of Moores Lane	144	East Bergholt	Core Village
	SS0182	Land south of Heath Road	75	East Bergholt	Core Village
	SS0200	Land east of Valley Road	32	Great Waldingfield	Hinterland Village
	SS0212	Land west of Hadleigh Road	41	Elmsett	Hinterland Village
	SS0251	Land east of Longfield Road	100	Capel St Mary	Core Village
	SS0299	Land at Poplar Lane	475	Sproughton	Ipswich Policy Area
	SS0433	Land west of Bures Road	46	Great Cornard	Urban Area/Market Town
	SS0591	6 Acre Field	14	Belstead	Ipswich Policy Area
	SS0628	Land to north of Ipswich Road	9	Nedging-with-Naughton	Hinterland Village
	SS0812	Land east of the B1064	150	Long Melford	Core Village
	SS0880	Land east of The Street	24	Raydon	Hinterland Village
	SS1020	Land west of Bourne Hill	75	Wherstead	Ipswich Policy Area
	SS1197	Land west of Hadleigh Road	10	East Bergholt	Core Village
	SS1289	Land north of MacKenzie Place	51	Cockfield	Hamlet/Countryside
	SS1290	Land east of Bury Road	10	Cockfield	Hamlet/Countryside
Allocated sites	SS0177	Land south of Tamage Road	100	Acton	Core Village
	SS0185	Land south of Ipswich Road	125	Brantham	Core Village
	SS0191	Land north of the A1071	475	Sproughton	Ipswich Policy Area
	SS0223	Land north of Burstall Lane and West of B1113	105	Sproughton	Ipswich Policy Area
	SS0242	Land at Tye Farm	500	Great Cornard	Urban Area/Market Town
	SS0278	Land south of Wattisham Road	75	Bildeston	Core Village
	SS0288	Land north-west of Melford Road	20	Lavenham	Core Village
	SS0295	Land south-east of Back Lane	226	Copdock and Washbrook	Ipswich Policy Area

Significant negative effect (--)					
	SS0298	Land north-east of Frog Hall Lane	600	Hadleigh	Urban Areas/Market Town
	SS0537	Former Babergh District Council Offices	50	Hadleigh	Urban Area/Market Town
	SS0584	Land north of Red Hill Road/ Malyon Road	75	Hadleigh	Urban Area/Market Town
	SS0587	Land south of High Road	40	Leavenheath	Hamlet/Countryside
	SS0593	Land south-west of London Road	12	Copdock and Washbrook	Ipswich Policy Area
	SS0637	Land south-west of Rembrow Road	30	Capel St Mary	Core Village
	SS0711	Land east of Loraine Way	50	Sproughton	Ipswich Policy Area
	SS0752	Land Adjacent to the B1070	12	Holton St Mary	Hamlets/Countryside
	SS0820	Land west of Church Lane	20	Bentley	Hinterland Village
	SS0910	Land south-west of Rembrow Road	520	Capel St Mary	Core Village
	SS0954	Land to the west of Hadleigh Road	25	Sproughton	Ipswich Policy Area
	SS1024	Land north of the A1071	300	Sproughton	Ipswich Policy Area
	SS1068	Land south of Waldingfield Road	20	Chilton	Hinterland Village
	SS1148	Land east of The Tye	5	Lindsey	Hamlet/Countryside
Reasonable alternative	SS0194	Land north of Folly Road	50	Great Waldingfield	Hinterland Village
	SS0211	Land west of Brantham Hill	50	Brantham	Core Village
	SS0220	Land south of Davidson Close	120	Great Cornard	Urban Area/Market Town
	SS0226	Land south-east of George Lane	50	Glemsford	Core Village
	SS0232	Land south of Whatfield Road	20	Elmsett	Hinterland Village
	SS0233	Land north-east of Ipswich Road	15	Elmsett	Hinterland Village
	SS0237	Land west of Bury Road	10	Lawshall	Hinterland Village
	SS0286	Land south of Kings Road	100	Glemsford	Core Village
	SS0292	Land west of Sand Hill	60	Boxford	Core Village
	SS0303	Land east of Frog Hall Lane	300	Hadleigh	Urban Area/Market Town
	SS0395	Land south of Station Road and west of Bergholt Road	60	Bentley	Hinterland Village
	SS0418	Land south-east of Benton Street	15	Hadleigh	Urban Area/Market Town
	SS0509	Land north of Newton Road	12	Sudbury	Urban Area/Market Town
	SS0620	Land west of London Road	25	Copdock and Washbrook	Ipswich Policy Area
SS0867	Land to the north-east of Pond Hall Lane	30	Hadleigh	Urban Area/Market Town	
SS0874	Land to the south-east of The Street	12	Little Waldingfield	Hamlet/Countryside	

Significant negative effect (--)					
	SS0909	Land west of Aldham Mill Hill and east of Gallows Hill	80	Hadleigh	Urban Area/Market Town
	SS1018	Land to the west of A1141	10	Cockfield	Hamlet/Countryside
	SS1019	Land west of Ballingdon Hill and south of Sandy Lane	60	Sudbury	Urban Area/Market Town
	SS1044	Land east of Bergholt Road	20	Bentley	Hinterland Village
	SS1110	Land west of Duffs Hill	25	Glemsford	Core Village
	SS1177	Land north of Sproughton Road	1000	Sproughton	Ipswich Policy Area
	SS1185	Land to the south of Poplar Lane	150	Sproughton	Ipswich Policy Area
	SS1205	Land west of Rodbridge Hill	30	Long Melford	Core Village
	SS1283	Land to the north of St Bartholomews Chapel	350	Long Melford	Urban Area/Market Town
Mid Suffolk District					
Allocated sites that are committed	SS0004	Land south of Bacton Road	98	Haughley	Core Village
	SS0006	Land west of Barton Road	129	Thurston	Core Village
	SS0008	Land south of Barrells Road	6	Thurston	Core Village
	SS0009	Land between Jack's Green Road and A14	43	Creting St Mary	Urban Area/Market Tow
	SS0012	Land north of Falconer Avenue	56	Old Newton	Hinterland Village
	SS0019	Land west of Meadow Lane	64	Thurston	Core Village
	SS0029 <sup>19</sup>	Land south of Union Road	300	Onehouse	Urban Area/Market Town
	SS0033	Land west of Old Norwich Road	190	Whitton	Ipswich Policy Area
	SS0047	Land west of Fishponds Way	65	Haughley	Core Village
	SS0064	Land south of Gun Cotton Way	68	Stowmarket	Urban Area/Market Town
	SS0073	Land north of B1115	143	Stowupland	Urban Area/Market Town
	SS0085	Land east of Ashfield Road	106	Elmswell	Core Village
	SS0088	Former Bacton Middle School	50	Bacton	Core Village
	SS0093	Land east of Green Road	49	Woolpit	Core Village
	SS0096	Land south of Church Road	38	Elmswell	Core Village
	SS0099	Land north-east of Turkey Hall Lane	51	Bacton	Core Village
	SS0129	Land south of Back Hills	40	Botesdale & Rickinghall	Core Village
SS0151	Land south of Church Road	18	Stowupland	Core Village	

<sup>19</sup> Site SS0029 was allocated in the Stowmarket Area Action Plan (2013).

Significant negative effect (--)					
	SS0266	Land north of Church Road and east of Wyverstone Road	81	Bacton	Core Village
	SS0270	Land north of Station Road	29	Haughley	Core Village
	SS0358	Land north of Top Road	8	Rattlesden	Hamlet/Countryside
	SS0453	Land north of Stoke Road and west of Clint Road	20	Thorndon	Hinterland Village
	SS0478	Land east of The Street	190	Bramford	Ipswich Policy Area
	SS0500	Land east of Mitchery Lane	22	Rattlesden	Hamlet/Countryside
	SS0518	Land south of Pretyman Avenue	85	Bacton	Core Village
	SS0530	Former Mid Suffolk District Council Offices and Car Park	64	Needham Market	Urban Area/Market Town
	SS0547	Land south of Old Stowmarket Road	120	Woolpit	Core Village
	SS0612	Land east of Bowl Road and north-west of Cobbold Close	9	Battisford	Hamlet/Countryside
	SS0636	Land between Bramford Road and the A14	14	Bramford	Ipswich Policy Area
	SS0669	Former Needham Market Middle School	41	Needham Market	Urban Area/Market Town
	SS0716	Land west of Ixworth Road	250	Thurston	Core Village
	SS0736	Land north of Tostock Road	9	Beyton	Hinterland Village
	SS0765	Land to the West of Church Road	15	Thurston	Core Village
	SS0860	Land to the east of Pear Tree Place	21	Great Finborough	Hinterland Village
	SS0949	Land north of Mill Road	69	Botesdale & Rickinghall	Core Village
	SS1005	Former Mid Suffolk District Council Offices and Car Park	30	Needham Market	Urban Area/Market Town
	SS1022	Chilton Leys	600	Stowmarket	Urban Area/Market Town
	SS1056	Land north of Pesthouse Lane	20	Barham	Ipswich Policy Area
	SS1088	Land north of Ashfield Road	8	Norton	Hamlet/Countryside
	SS1190	Land north of Gardenhouse Lane	42	Botesdale & Rickinghall	Core Village
	SS1199	Land west of Stowmarket Road	66	Needham Market	Urban Area/Market Town
	SS1288	Land east and west of Prentice Road	60	Stowmarket	Urban Area/Market Town
SS1293	Land south of Great Bricett Business Park	51	Great Bricett	Hamlet/Countryside	
SS1294	Land south of Shop Street	26	Worlingworth	Hamlet/Countryside	
Allocated sites	SS0031	Land north of Ipswich Road	140	Debenham	Core Village
	SS0039	Land north of Church Road	60	Elmswell	Core Village
	SS0065	Land south of Glebe Way	75	Mendlesham	Core Village

Significant negative effect (-)					
SS0075	Land east of Ixworth Road	200	Thurston	Core Village	
SS0076	Land north of Church Lane	270	Barham	Ipswich Policy Area	
SS0084	Land north of The Street	10	Westhorpe	Hamlet/Countryside	
SS0090	Land east of Church Road and south of Old Post Office Lane	25	Thurston	Core Village	
SS0101	Former Stowmarket Middle School	40	Stowmarket	Urban Area/Market Town	
SS0107	Land north-west of School Road	50	Elmswell	Core Village	
SS0121	Land south of Fitzgerald Road	100	Bramford	Ipswich Policy Area	
SS0132	Land west of Station Road	100	Elmswell	Core Village	
SS0141	Land south of The Street	35	Stonham Aspal	Hinterland Village	
SS0145	Land west of Main Road	30	Somersham	Hinterland Village	
SS0157 <sup>20</sup>	Land south of Union Road	100	Onehouse	Urban Area/Market Town	
SS0163	Land east of Norwich Road	5	Stonham Parva	Hinterland Village	
SS0264	Ashes Farm	575	Stowmarket	Urban Area/Market Town	
SS0268	Land east of Aspoll Road	87	Debenham	Core Village	
SS0319	Land south of Heath Road	110	Thurston	Core Village	
SS0513	Land between New Road and Leys Road	5	Tostock	Hinterland Village	
SS0551	Land east of Norwich Road	325	Barham	Ipswich Policy Area	
SS0570	Land east of A140 The Street	10	Wetheringsett	Hamlet/Countryside	
SS0599	Land to the north-east of the junction between The Street and Cedars Hill	10	Wetheringsett	Hamlet/Countryside	
SS0668	Land south of Creeting Road West	25	Stowmarket	Urban Area/Market Towns	
SS0670	Land north-east of The Street	500	Woolpit	Core Village	
SS0678	Land south of Hubbard's Lane and east of The Gree	5	Hessett	Hinterland Village	
SS0706	Land to the west of Debenham Way	10	Pettaugh	Hamlet/Countryside	
SS0728	Land to the south of Denham Road	30	Hoxne	Hinterland Village	
SS0729	Land south of Beyton Road	200	Thurston	Core Village	
SS0783	Land west of Heath Road	30	Woolpit	Core Village	
SS0786	Land to the south of Wickham Road and west of A140	10	Thwaite	Hinterland Village	
SS0796	Land to the west of B1077	15	Ashbocking	Hamlet/Countryside	

<sup>20</sup> Site SS0157 was allocated in the Stowmarket Area Action Plan (2013).

Significant negative effect (--)					
	SS0810	Land west of Norwich Road	5	Stonham Parva	Hinterland Village
	SS0832	Land west of Main Road	45	Henley	Hinterland Village
	SS0861	Land south of Church Lane	75	Claydon	Ipswich Policy Area
	SS0863	Land north of B1123	25	Metfield	Hinterland Village
	SS0869	Land west of Bildeston Road	5	Combs	Hinterland Village
	SS0902	Land south of Low Road	18	Debenham	Core Village
	SS1058	Land north east of Haggars Mead	20	Stonham Earl	Hinterland Village
	SS1065	Land west of Church Road	10	Beyton	Hinterland Village
	SS1071	Land south of Stowmarket Road	300	Stowupland	Urban Area/Market Town
	SS1118	Land north of Magdalen Street	80	Eye	Urban Area/Market Town
	SS1198	Land north of Laxfield Road	45	Stradbroke	Core Village
Reasonable alternatives	SS0014	Land north of Maple Way	150	Eye	Urban Area/Market Town
	SS0028	Land north of Barking Road	300	Needham Market	Urban Area/Market Town
	SS0083	Land north-east of Chapel Road	50	Mendlesham	Core Village
	SS0091	Land between The Street and A143	100	Botesdale & Rickinghall	Core Village
	SS0105	Land between Ixworth Road and Hawes Lane	12	Norton	Hinterland Village
	SS0119	Land west of Old Ipswich Road	21	Claydon	Ipswich Policy Area
	SS0171	Land south of Ashbocking Road	20	Henley	Hinterland Village
	SS0267	Land north of Gracechurch Street	150	Debenham	Core Village
	SS0642	Land to the north of Low Road	250	Debenham	Core Village
	SS0673	Land north-east of Heath Road	10	Woolpit	Core Village
	SS0859	Land south of Church Road	50	Bacton	Core Village
	SS0864	Land north of Gipping Road	20	Great Blakenham	Ipswich Policy Area
	SS1055	Land west of High Road	25	Great Finborough	Hinterland Village
	SS1070	Land east of Barking Road	120	Barking	Urban Area/Market Town
	SS1106	Land south of Gipping Road	100	Stowupland	Core Village
	SS1153	Land south-west of Stowmarket Road	134	Needham Market	Urban Area/Market Town
	SS1189	Land east of Eye Road and north of Church Close	10 <sup>21</sup>	Kenton	Hamlet/Countryside
SS1239	Land east of Old Ipswich Road	250	Claydon	Ipswich Policy Area	

<sup>21</sup> Based on assumed density basis.

Significant negative effect (-)					
	SS1248	Land south of Mill Road	25	Botesdale	Core Village
	SS1266	Land south of Half Moon Lane	15	Redgrave	Hinterland Village

**6.48** The potential for significant negative effects against SA Objective 5 (To conserve and enhance water quality and resources) were determined using four different criteria relating to Source Protection Zones, water resources, waste water treatment works capacity, and foul sewerage network capacity. Significant negative effects could be recorded on the basis of a single criterion or a number of criteria cumulatively. In total, just over 60% of sites were considered to have the potential for significant negative effects, prior to mitigation.

**6.49** Five of these sites score a significant negative effect against SA Objective 5 because they are expected to have a major negative effect against criterion 5a (Source Protection Zones): SS0433 (Land west of Bures Road, Great Cornard); SS1283 (Land to the north of St Bartholomews Chapel, Sudbury); SS0107 (Land north-west of School Road, Elmswell); SS0132 (Land west of Station Road, Elmswell); and SS1118 (Land north of Magdalen Street, Eye). These five sites all fall within Source Protection Zone 1. Three of the five sites are located in Mid Suffolk District and allocated in the JLP, being SS0107 (Land north-west of School Road, Elmswell), SS0132 (Land west of Station Road, Elmswell) and SS1118 (Land north of Magdalen Street, Eye). The remaining two sites are located in Babergh District, one being allocated and committed, SS0433 (Land west of Bures Road, Great Cornard), whereas the other one is considered a reasonable alternative, SS1283 (Land to the north of St Bartholomew's Chapel, Long Melford).

**6.50** The remaining sites score a significant negative effect against this objective because they are expected to result in three or more minor negative effects against the four criteria.

#### Possible mitigation

**6.51** Mitigation to prevent pollution to water resources in Source Protection Zones needs to be determined on a site-by-site basis, taking into account the nature of the development and the risk posed to the water resource concerned. This will require engagement with the Environment Agency.

**6.52** Broader water resource and wastewater treatment issues are normally dealt with through water resource management plans and asset management plans respectively, which aim to provide long-term plans for the management of the water environment, and are produced by water companies, in liaison with the Environment Agency and the Water Resources Regulation Authority (Ofwat). Individual developments may be required to make a financial contribution (e.g. to the upgrading

of a water recycling centre) if the upgrading is linked to the development concerned.

## SA Objective 6: To maintain and where possible improve air quality and reduce noise pollution

### Significant positive effects

**6.53** Under the site appraisal methodology, it is not possible for any site to score a significant positive effect against SA Objective 6 (To maintain and where possible improve air quality and reduce noise pollution). This is because the overall increase in housing and population numbers across both

Districts will result in an increase in private car use, as well as the train, which will have adverse effects on air quality and noise pollution. Development will also not result in positive effects on odour.

### Significant negative effects

Significant negative effect (--)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	SS0177	Land south of Tamage Road	100	Acton	Core Village
	SS0179	Land east of Church Road	34	Stutton	Hinterland Village
	SS0181	Land north-west of Moores Lane	144	East Bergholt	Core Village
	SS0182	Land south of Heath Road	75	East Bergholt	Core Village
	SS0200	Land east of Valley Road	32	Great Waldingfield	Hinterland Village
	SS0212	Land west of Hadleigh Road	41	Elmsett	Hinterland Village
	SS0251	Land east of Longfield Road	100	Capel St Mary	Core Village
	SS0259	Land west of Hadleigh Road	7	Aldham	Hamlet/Countryside
	SS0299	Land at Poplar Lane	475	Sproughton	Ipswich Policy Area
	SS0392	Land west of A137	5	Tattingstone	Hamlet/Countryside
	SS0433	Land west of Bures Road	46	Great Cornard	Urban Area/Market Town
	SS0517	Land south-east of Duke Street	6	Hintlesham	Hinterland Village
	SS0591	6 Acre Field	14	Belstead	Ipswich Policy Area
	SS0628	Land to north of Ipswich Road	9	Nedging-with-Naughton	Hinterland Village
	SS0683	Land to the south-west of Harrow Green	5	Lawshall	Hinterland Village
	SS0696	Land north of Holbrook Road	6	Stutton	Hinterland Village
	SS0717	Land east of Ipswich Road	7	Holbrook	Core Village
	SS0812	Land east of the B1064	150	Long Melford	Core Village
	SS0872	Land east of Richardson Lane	24	Chelmondiston	Hinterland Village
	SS0880	Land east of The Street	24	Raydon	Hinterland Village
SS1020	Land west of Bourne Hill	75	Wherstead	Ipswich Policy Area	
SS1082	Land east of Kings Hill	8	Great Cornard	Urban Area/Market Town	

Significant negative effect (--)					
	SS1121	Land north-west of Waldingfield Road	130	Chilton	Urban Area/Market Town
	SS1125	Land north of Manningtree Road	14	Stutton	Hinterland Village
	SS1197	Land west of Hadleigh Road	10	East Bergholt	Core Village
	SS1289	Land north of MacKenzie Place	51	Cockfield	Hamlet/Countryside
	SS1290	Land east of Bury Road	10	Cockfield	Hamlet/Countryside
Allocated sites	SS0185	Land south of Ipswich Road	125	Brantham	Core Village
	SS0191	Land north of the A1071	475	Sproughton	Ipswich Policy Area
	SS0203	Land south of Main Road	5	Woolverstone	Hamlet/Countryside
	SS0204	Land south of B1456	15	Chelmondiston	Hinterland Village
	SS0208	Land south of The Street	50	Shotley	Core Village
	SS0223	Land north of Burstall Lane and West of B1113	105	Sproughton	Ipswich Policy Area
	SS0242	Land at Tye Farm	500	Great Cornard	Urban Area/Market Town
	SS0255	Land north of Glebe Lane and west of Main Road, Woolverstone	5	Woolverstone	Hamlet/Countryside
	SS0258	Land north of The Street	5	Aldham	Hamlet/Countryside
	SS0288	Land north-west of Melford Road	20	Lavenham	Core Village
	SS0295	Land south-east of Back Lane	226	Copdock and Washbrook	Ipswich Policy Area
	SS0298	Land north-east of Frog Hall Lane	600	Hadleigh	Urban Area/Market Town
	SS0403	Land south of Hadleigh Road	5	Boxford	Hamlet/Countryside
	SS0465	Land north of B1068 and east of Sudbury Road, Stoke by Nayland	8	Stoke by Nayland	Hinterland Village
	SS0507	Council Depot, Wenham Magna	6	Wenham Magna	Hamlet/Countryside
	SS0512	Land east of Upper Street	8	Stanstead	Hamlet/Countryside
	SS0584	Land north of Red Hill Road/ Malyon Road	75	Hadleigh	Urban Area/Market Town
	SS0587	Land south of High Road	40	Leavenheath	Hamlet/Countryside
	SS0593	Land south-west of London Road	12	Copdock and Washbrook	Ipswich Policy Area
	SS0637	Land south-west of Rembrow Road	30	Capel St Mary	Core Village
	SS0682	Land east of Bury Road	15	Lawshall	Hinterland Village
	SS0709	Land to the south-east of Butt Road	8	Stoke by Nayland	Hinterland Village
	SS0711	Land east of Loraine Way	50	Sproughton	Ipswich Policy Area
SS0752	Land Adjacent to the B1070	12	Holton St Mary	Hamlet/Countryside	
SS0754	Claypits Avenue (Garages)	5	Bures St Mary	Core Village	

Significant negative effect (--)					
	SS0820	Land west of Church Lane	20	Bentley	Hinterland Village
	SS0877	Land north of Woodlands Road	10	Raydon	Hinterland Village
	SS0910	Land south-west of Rembrow Road,	520	Capel St Mary	Core Village
	SS0954	Land to the west of Hadleigh Road	25	Sproughton	Ipswich Policy Area
	SS1024	Land north of the A1071	300	Sproughton	Ipswich Policy Area
	SS1068	Land south of Waldingfield Road	20	Chilton	Hinterland Village
	SS1148	Land east of The Tye	5	Lindsey	Hamlet/Countryside
	SS1155	Land north of Goldenlond	10	Stoke by Nayland	Hinterland Village
Reasonable alternative	SS0194	Land north of Folly Road	50	Great Waldingfield	Hinterland Village
	SS0211	Land west of Brantham Hill	50	Brantham	Core Village
	SS0220	Land south of Davidson Close	120	Great Cornard	Urban Area/Market Town
	SS0226	Land south-east of George Lane	50	Glemsford	Core Village
	SS0232	Land south of Whatfield Road	20	Elmsett	Hinterland Village
	SS0233	Land north-east of Ipswich Road	15	Elmsett	Hinterland Village
	SS0237	Land west of Bury Road	10	Lawshall	Hinterland Village
	SS0286	Land south of Kings Road	100	Glemsford	Core Village
	SS0292	Land west of Sand Hill	60	Boxford	Core Village
	SS0303	Land east of Frog Hall Lane	300	Hadleigh	Urban Area/Market Town
	SS0395	Land south of Station Road and west of Bergholt Road	60	Bentley	Hinterland Village
	SS0418	Land south-east of Benton Street	15	Hadleigh	Urban Area/Market Town
	SS0503	Land north-east of Valley View	5	Stanstead	Hamlet/Countryside
	SS0509	Land north of Newton Road	12	Sudbury	Urban Area/Market Town
	SS0590	Land east of Waldringfield Road and north of Church Field Road	25	Chilton	Urban Area/Market Town
	SS0620	Land west of London Road	25	Copdock and Washbrook	Ipswich Policy Area
	SS0644	Land south of Hadleigh Road	8	Elmsett	Hinterland Village
	SS0685	Land west of Melford Road	5	Lawshall	Hinterland Village
	SS0690	Land south of Lambs Lane	10	Lawshall	Hinterland Village
	SS0745	Elm Road/Chilton Lodge Road	5	Sudbury	Urban Area/Market Town
SS0750	Second Avenue (Garages)	5	Sudbury	Urban Area/Market Town	
SS0867	Land to the north-east of Pond Hall Lane	30	Hadleigh	Urban Area/Market Town	

Significant negative effect (--)					
	SS0874	Land to the south-east of The Street	12	Little Waldingfield	Hamlet/Countryside
	SS0909	Land west of Aldham Mill Hill and east of Gallows Hill	80	Hadleigh	Urban Area/Market Town
	SS0968	Highfield Mill	5	Sudbury	Urban Area/Market Town
	SS1018	Land to the west of A1141	10	Cockfield	Hamlet/Countryside
	SS1019	Land west of Ballingdon Hill and south of Sandy Lane	60	Sudbury	Urban Area/Market Town
	SS1044	Land east of Bergholt Road	20	Bentley	Hinterland Village
	SS1060	Land west of Noaks Road	6	Raydon	Hinterland Village
	SS1110	Land west of Duffs Hill	25	Glemsford	Core Village
	SS1177	Land north of Sproughton Road	1000	Sproughton	Ipswich Policy Area
	SS1185	Land to the south of Poplar Lane	150	Sproughton	Ipswich Policy Area
	SS1205	Land west of Rodbridge Hill	30	Long Melford	Core Village
	SS1238	Land south of The Street	10	Harkstead	Hamlet/Countryside
	SS1257	Land south of Hadleigh Road	5	Boxford	Core Village
	SS1283	Land to the north of St Bartholomew's Chapel	350	Long Melford	Urban Area/Market Town
Mid Suffolk District					
Allocated sites that are committed	SS0004	Land south of Bacton Road	98	Haughley	Core Village
	SS0006	Land west of Barton Road	129	Thurston	Core Village
	SS0008	Land south of Barrells Road	6	Thurston	Core Village
	SS0009	Land between Jack's Green Road and A14	43	Creeting St Mary	Urban Area/Market Town
	SS0019	Land west of Meadow Lane	64	Thurston	Core Village
	SS0020	Land south of The Broadway	13	Badwell Ash	Hinterland Village
	SS0029 <sup>22</sup>	Land south of Union Road	300	Onehouse	Urban Area/Market Town
	SS0033	Land west of Old Norwich Road	190	Whitton	Ipswich Policy Area
	SS0037	Land west of The Street	21	Badwell Ash	Hinterland Village
	SS0040	Land west of Wattisfield Road	60	Walsham-le-Willows	Core Village
	SS0047	Land west of Fishponds Way	65	Haughley	Core Village
	SS0064	Land south of Gun Cotton Way	68	Stowmarket	Urban Area/Market Town
	SS0073	Land north of B1115	143	Stowupland	Urban Area/Market Town

<sup>22</sup> Site SS0029 was allocated in the Stowmarket Area Action Plan (2013).

Significant negative effect (--)					
	SS0078	Land south-east of Hunston Road	52	Badwell Ash	Hinterland Village
	SS0085	Land east of Ashfield Road	106	Elmswell	Core Village
	SS0093	Land east of Green Road	49	Woolpit	Core Village
	SS0096	Land south of Church Road	38	Elmswell	Core Village
	SS0099	Land north-east of Turkey Hall Lane	51	Bacton	Core Village
	SS0129	Land south of Back Hills	40	Botesdale & Rickinghall	Core Village
	SS0358	Land north of Top Road	8	Rattlesden	Hamlet/Countryside
	SS0478	Land east of The Street	190	Bramford	Ipswich Policy Area
	SS0500	Land east of Mitchery Lane	22	Rattlesden	Hamlet/Countryside
	SS0530	Former Mid Suffolk District Council Offices and Car Park	64	Needham Market	Urban Area/Market Town
	SS0547	Land south of Old Stowmarket Road	120	Woolpit	Core Village
	SS0550	Land east of Withersdale Road, opposite Mendham Primary School	6	Mendham	Hinterland Village
	SS0636	Land between Bramford Road and the A14	14	Bramford	Ipswich Policy Area
	SS0669	Former Needham Market Middle School	41	Needham Market	Urban Area/Market Town
	SS0716	Land west of Ixworth Road	250	Thurston	Core Village
	SS0736	Land north of Tostock Road	9	Beyton	Hinterland Village
	SS0765	Land to the West of Church Road	15	Thurston	Core Village
	SS0949	Land north of Mill Road	69	Botesdale & Rickinghall	Core Village
	SS1005	Former Mid Suffolk District Council Offices and Car Park	30	Needham Market	Urban Area/Market Town
	SS1056	Land north of Pesthouse Lane	20	Barham	Ipswich Policy Area
	SS1088	Land north of Ashfield Road	8	Norton	Hamlet/Countryside
	SS1199	Land west of Stowmarket Road	66	Needham Market	Urban Area/Market Town
	SS1288	Land east and west of Prentice Road	60	Stowmarket	Urban Area/Market Town
	SS1292	Land north of The Broadway	33	Badwell Ash	Hinterland Village
Allocated sites	SS0038	Land east of Old Ipswich Road	15	Yaxley	Hinterland Village
	SS0039	Land north of Church Road	60	Elmswell	Core Village
	SS0042	Land west of Old Ipswich Road	20	Yaxley	Hinterland Village
	SS0075	Land east of Ixworth Road	200	Thurston	Core Village
	SS0076	Land north of Church Lane	270	Barham	Ipswich Policy Area
	SS0084	Land north of The Street	10	Westhorpe	Hamlet/Countryside

Significant negative effect (--)				
SS0090	Land east of Church Road and south of Old Post Office Lane	25	Thurston	Core Village
SS0107	Land north-west of School Road	50	Elmswell	Core Village
SS0121	Land south of Fitzgerald Road	100	Bramford	Ipswich Policy Area
SS0127	Land west of Jacks Green Road	5	Creeting St Mary	Urban Area/Market Town
SS0132	Land west of Station Road	100	Elmswell	Core Village
SS0145	Land west of Main Road	30	Somersham	Hinterland Village
SS0157 <sup>23</sup>	Land south of Union Road	100	Onehouse	Urban Area/Market Town
SS0163	Land east of Norwich Road	5	Stonham Parva	Hinterland Village
SS0264	Ashes Farm	375	Stowmarket	Urban Area/Market Town
SS0319	Land south of Heath Road	110	Thurston	Core Village
SS0513	Land between New Road and Leys Road	5	Tostock	Hinterland Village
SS0551	Land east of Norwich Road	325	Barham	Ipswich Policy Area
SS0558	Land to the south of Long Thurlow Road	10	Badwell Ash	Hamlet/Countryside
SS0570	Land east of A140 The Street	10	Wetheringsett	Hamlet/Countryside
SS0573	Land south of Church Road	5	Worlingworth	Hamlet/Countryside
SS0599	Land to the north-east of the junction between The Street and Cedars Hill	10	Wetheringsett	Hamlet/Countryside
SS0603	Land north of Barking Road and west of Hascot Hill	10	Barking	Hinterland Village
SS0654	Land south of Chalk Hill Lane and West of Hood Drive	8	Great Blakenham	Ipswich Policy Area
SS0668	Land south of Creeting Road West	25	Stowmarket	Urban Area/Market Town
SS0670	Land north-east of The Street	500	Woolpit	Core Village
SS0678	Land south of Hubbard's Lane and east of The Green	5	Hessett	Hinterland Village
SS0706	Land to the west of Debenham Way	10	Pettaugh	Hamlet/Countryside
SS0723	Land to the west of The Street	8	Stoke Ash	Hamlet/Countryside
SS0729	Land south of Beyton Road,	200	Thurston	Core Village
SS0783	Land west of Heath Road,	30	Woolpit	Core Village
SS0786	Land to the south of Wickham Road and west of A140	10	Thwaite	Hinterland Village
SS0796	Land to the west of B1077	15	Ashbocking	Hamlet/Countryside

<sup>23</sup> Site SS0157 was allocated in the Stowmarket Area Action Plan (2013).

Significant negative effect (--)					
	SS0810	Land west of Norwich Road	5	Stonham Parva	Hinterland Village
	SS0814	Land north of Long Thurlow Road	5	Badwell Ash	Hamlet/Countryside
	SS0832	Land west of Main Road	45	Henley	Hinterland Village
	SS0861	Land south of Church Lane	75	Claydon	Ipswich Policy Area
	SS1058	Land north east of Haggars Mead	20	Stonham Earl	Hinterland Village
	SS1065	Land west of Church Road	10	Beyton	Hinterland Village
	SS1071	Land south of Stowmarket Road	300	Stowupland	Urban Area/Market Town
Reasonable alternatives	SS0028	Land north of Barking Road	300	Needham Market	Urban Area/Market Town
	SS0080	Land east of Queen Street	10	Stradbroke	Core Village
	SS0105	Land between Ixworth Road and Hawes Lane	12	Norton	Hinterland Village
	SS0119	Land west of Old Ipswich Road	21	Claydon	Ipswich Policy Area
	SS0171	Land south of Ashbocking Road	20	Henley	Hinterland Village
	SS0575	Land east of Queen Street	30	Stradbroke	Core Village
	SS0673	Land north-east of Heath Road	10	Woolpit	Core Village
	SS0735	Land south of Church Road	10	Westhorpe	Hamlet/Countryside
	SS0809	Land north of Long Thurlow Road	10	Badwell Ash	Hamlet/Countryside
	SS0815	Land south of The Street	5	Hunston	Hamlet/Countryside
	SS0864	Land north of Gipping Road	20	Great Blakenham	Ipswich Policy Area
	SS0952	Land south of Gipping Road	10	Great Blakenham	Ipswich Policy Area
	SS1070	Land east of Barking Road	120	Barking	Urban Area/Market Town
	SS1153	Land south-west of Stowmarket Road	134	Needham Market	Urban Area/Market Town
	SS1239	Land east of Old Ipswich Road	250	Claydon	Ipswich Policy Area
SS1268	Land east of School Lane	8	Coddenham	Hinterland Village	

**6.54** In the absence of traffic modelling, a precautionary approach was taken to the identification of potential effects on air pollution. Analysis of Census 2011 data using 'Datashine Commute' indicates that commuting distance by cars to locations containing AQMAs is typically 25km (straight line) for longer journeys, with volumes of car commuting journeys increasingly markedly at around half that distance. Therefore, residential sites within 12.5km of an AQMA were assigned a significant negative effect. This is irrespective of site size, on the premise that all sites within this distance can contribute to air pollution in the AQMAs.

**6.55** A large number of sites are expected to have a significant negative effect against SA Objective 6 (To maintain and where possible improve air quality and reduce noise pollution) because they tend to be located within 12.5km of an AQMA (criterion 6a). Therefore, it is likely that development at these sites could result in adverse effects on the Sudbury AQMA present within Babergh District, in addition to AQMAs in surrounding settlements, most notably in Ipswich and in and close to Bury St Edmunds.

**6.56** Sites also scored a significant negative effect against this objective because they fall within an area that experiences

sound levels exceeding 54.9dB at night. This was the case for one quarter of the sites. Alternatively, it is because they fall within 250m of a Site Safeguard Area of a waste management facility, which was the case for a small number of sites. Only one site scored a major negative effect against criteria 6a (AQMs), 6b (Noise) and 6c (Odour) under SA Objective 6: SS1024 (Land north of the A1071, Sproughton), which has been allocated.

### Possible mitigation

**6.57** Mitigation of air pollution is best achieved by providing alternatives to the car for making journeys, such as walking and cycling and the provision of public transport services. However, these factors are more likely to be taken into account in site selection, rather than provided by individual sites, unless the site is of a large scale. However, harmful vehicle emissions are being reduced on an ongoing basis through a combination of regulations, engine technology, and a switch to less polluting fuels. It is likely that, towards the end of the Plan period, electric cars will form a much greater proportion of cars on the road, helping to reduce air pollution further.

**6.58** Mitigation against odour from waste management facilities is most easily achieved at the waste management facility itself, through waste management practices, and physical barriers, including indoor facilities where possible.

**6.59** The effects of noise pollution from transport corridors can be reduced by physical barriers, such as fencing, and design of development including cuttings and noise attenuation bunds.

**SA Objective 7: To conserve soil and mineral resources**

**Significant positive effects**

Significant positive effect (++)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	SS0502	Angel Court, Angel Street	21	Hadleigh	Urban Area/Market Town
Allocated sites	SS0507	Council Depot	6	Wenham Magna	Hamlet/Countryside
	SS0537	Former Babergh District Council Offices	50	Hadleigh	Urban Area/Market Town
	SS0754	Claypits Avenue (Garages)	5	Bures St Mary	Core Village
Reasonable alternative	SS0745	Elm Road/Chilton Lodge Road	5	Sudbury	Urban Area/Market Town
	SS0750	Second Avenue (Garages)	5	Sudbury	Urban Area/Market Town
	SS1257	Land south of Hadleigh Road	5	Boxford	Core Village
Mid Suffolk District					
Allocated sites that are committed	SS0530	Former Mid Suffolk District Council Offices and Car Park	64	Needham Market	Urban Area/Market Town
	SS0669	Former Needham Market Middle School	41	Needham Market	Urban Area/Market Town
	SS0736	Land north of Tostock Road	9	Beyton	Hinterland Village
	SS1005	Former Mid Suffolk District Council Offices and Car Park	30	Needham Market	Urban Area/Market Town
	SS1056	Land north of Pesthouse Lane	20	Barham	Ipswich Policy Area
Allocated sites	SS0101	Former Stowmarket Middle School	40	Stowmarket	Urban Area/Market Town
	SS0668	Land south of Creeting Road West	25	Stowmarket	Urban Area/Market Town
	SS0672	Land north of Church Street	12	Eye	Urban Area/Market Town
	SS0698	Land to the south-west of Yaxley Road	5	Mellis	Hinterland Village
	SS0728	Land to the south of Denham Road	30	Hoxne	Hinterland Village
	SS0814	Land north of Long Thurlow Road	5	Badwell Ash	Hamlet/Countryside
	SS1118	Land north of Magdalen Street	80	Eye	Urban Area/Market Town
Reasonable alternatives	SS0864	Land north of Gipping Road	20	Great Blakenham	Ipswich Policy Area
	SS0952	Land south of Gipping Road	10	Great Blakenham	Ipswich Policy Area

Significant positive effect (++)					
	SS1187	Land east of Stonham Road	10 <sup>24</sup>	Cotton	Hamlet/Countryside
	SS1279	Land to the west of Brundish Road	5	Wilby	Hamlet/Countryside

**6.60** A high number of allocated sites that are committed and allocated sites that are not yet committed have received a significant positive effect in the significance scoring against SA Objective 7 (To conserve soil and mineral resources) when

compared to the reasonable alternatives. All of these sites receive a significant positive effect because they comprise brownfield land. Therefore, they make efficient use of previously developed land.

### Significant negative effects

Significant negative effect (--)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	SS0177	Land south of Tamage Road	100	Acton	Core Village
	SS0179	Land east of Church Road	34	Stutton	Hinterland Village
	SS0181	Land north-west of Moores Lane	144	East Bergholt	Core Village
	SS0182	Land south of Heath Road	75	East Bergholt	Core Village
	SS0251	Land east of Longfield Road	100	Capel St Mary	Core Village
	SS0299	Land at Poplar Lane	475	Sproughton	Ipswich Policy Area
	SS0591	6 Acre Field	14	Belstead	Ipswich Policy Area
	SS0696	Land north of Holbrook Road	6	Stutton	Hinterland Village
	SS0717	Land east of Ipswich Road	7	Holbrook	Core Village
	SS0812	Land east of the B1064	150	Long Melford	Core Village
	SS0872	Land east of Richardson Lane	24	Chelmondiston	Hinterland Village
	SS1020	Land west of Bourne Hill	75	Wherstead	Ipswich Policy Area
Allocated sites	SS0191	Land north of the A1071	475	Sproughton	Ipswich Policy Area
	SS0203	Land south of Main Road	5	Woolverstone	Hamlet/Countryside
	SS0204	Land south of B1456	15	Chelmondiston	Hinterland Village
	SS0208	Land south of The Street	50	Shotley	Core Village
	SS0242	Land at Tye Farm	500	Great Cornard	Urban Area/Market Town
	SS0255	Land north of Glebe Lane and west of Main Road	5	Woolverstone	Hamlet/Countryside
	SS0295	Land south-east of Back Lane	226	Copdock and Washbrook	Ipswich Policy Area

<sup>24</sup> Based on an assumed density basis.

Significant negative effect (--)					
	SS0403	Land south of Hadleigh Road, Calais Street	5	Boxford	Hamlet/Countryside
	SS0587	Land south of High Road	40	Leavenheath	Hamlet/Countryside
	SS0593	Land south-west of London Road	12	Copdock and Washbrook	Ipswich Policy Area
	SS0752	Land Adjacent to the B1070	12	Holton St Mary	Hamlet/Countryside
	SS0820	Land west of Church Lane	20	Bentley	Hinterland Village
	SS0910	Land south-west of Rembrow Road	520	Capel St Mary	Core Village
	SS0954	Land to the west of Hadleigh Road	25	Sproughton	Ipswich Policy Area
	SS1024	Land north of the A1071	300	Sproughton	Ipswich Policy Area
Reasonable alternative	SS0226	Land south-east of George Lane	50	Glemsford	Core Village
	SS0286	Land south of Kings Road	100	Glemsford	Core Village
	SS0395	Land south of Station Road and west of Bergholt Road	60	Bentley	Hinterland Village
	SS0503	Land north-east of Valley View	5	Stanstead	Hamlet/Countryside
	SS0620	Land west of London Road	25	Copdock and Washbrook	Ipswich Policy Area
	SS1018	Land to the west of A1141	10	Cockfield	Hamlet/Countryside
	SS1044	Land east of Bergholt Road	20	Bentley	Hinterland Village
	SS1060	Land west of Noaks Road	6	Raydon	Hinterland Village
	SS1110	Land west of Duffs Hill	25	Glemsford	Core Village
	SS1185	Land to the south of Poplar Lane	150	Sproughton	Ipswich Policy Area
	SS1238	Land south of The Street	10	Harkstead	Hamlet/Countryside
Mid Suffolk District					
Allocated sites that are committed	SS0029 <sup>25</sup>	Land south of Union Road	300	Onehouse	Urban Area/Market Town
	SS0047	Land west of Fishponds Way	65	Haughley	Core Village
	SS0064	Land south of Gun Cotton Way	68	Stowmarket	Urban Area/Market Town
	SS0078	Land south-east of Hunston Road	52	Badwell Ash	Hinterland Village
	SS0096	Land south of Church Road	38	Elmswell	Core Village
	SS0270	Land north of Station Road	29	Haughley	Core Village
	SS0453	Land north of Stoke Road and west of Clint Road	20	Thorndon	Hinterland Village
	SS0478	Land east of The Street	190	Bramford	Ipswich Policy Area
	SS0716	Land west of Ixworth Road	250	Thurston	Core Village

<sup>25</sup> Site SS0029 was allocated in the Stowmarket Area Action Plan (2013).

Significant negative effect (--)					
	SS1022	Chilton Leys	600	Stowmarket	Urban Area/Market Town
Allocated sites	SS0039	Land north of Church Road	60	Elmswell	Core Village
	SS0075	Land east of Ixworth Road	200	Thurston	Core Village
	SS0076	Land north of Church Lane	270	Barham	Ipswich Policy Area
	SS0121	Land south of Fitzgerald Road	100	Bramford	Ipswich Policy Area
	SS0157 <sup>26</sup>	Land south of Union Road	100	Onehouse	Urban Area/Market Town
	SS0264	Ashes Farm	575	Stowmarket	Urban Area/Market Town
	SS0380	Land south of Wickham Road	10	Finningham	Hinterland Village
	SS0551	Land east of Norwich Road	325	Barham	Ipswich Policy Area
	SS0654	Land south of Chalk Hill Lane and West of Hood Drive	8	Great Blakenham	Ipswich Policy Area
	SS0670	Land north-east of The Street	500	Woolpit	Core Village
	SS0832	Land west of Main Road	45	Henley	Hinterland Village
	SS1065	Land west of Church Road	10	Beyton	Hinterland Village
Reasonable alternatives	SS0014	Land north of Maple Way	150	Eye	Urban Area/Market Town
	SS0028	Land north of Barking Road	300	Needham Market	Urban Area/Market Town
	SS0815	Land south of The Street	5	Hunston	Hamlet/Countryside
	SS1070	Land east of Barking Road	120	Barking	Urban Area/Market Town

**6.61** There are a large number of sites, both allocated and reasonable alternatives, that are expected to have significant negative effects against SA Objective 7 (To conserve soil and mineral resources). All of the sites with the exception of SS0096 (Land south of Church Road, Elmswell), SS0392 (Land west of A137, The Heath, Tattlingstone) and SS1020 (Land west of Bourne Hill, Wherstead), scored a major negative effect against criterion 7b (Agricultural land classification) because they fall on Grade 1 and/or 2 agricultural land, which is considered the Best and Most Versatile Agricultural Land. For the three sites that did not receive this effect, they received a major negative effect against criterion 7c (Minerals Consultation Area, existing, planned or potential mineral extraction sites) because they are located within 250m of an existing, planned or potential site allocated in the Suffolk Mineral and Waste Local Plan for sand and gravel extraction. Three sites scored a major negative effect both criteria, and therefore perform the least well out of all sites against this objective: SS0076 (Land north of Church

Lane, Barham), SS0551 (Land east of Norwich Road, Barham), both of which are allocated but yet committed, and S0620 (Land west of London Road, Copdock and Washbrook), which is not allocated.

#### Possible mitigation

**6.62** With respect to soils, it is difficult to mitigate the loss of Best and Most Versatile Agricultural Land, which will be lost permanently by development.

**6.63** With respect to mineral resources, it may be possible to extract the mineral resource prior to development and, in some instances, to use the resource on site as part of the development itself.

<sup>26</sup> Site SS0157 was allocated in the Stowmarket Area Action Plan (2013).

### SA Objective 8: To promote the sustainable management of waste

#### Significant positive effects

**6.64** There is no significance score for SA Objective 8 (To promote the sustainable management of waste), as this SA Objective is not locationally specific.

#### Significant negative effects

**6.65** There is no significance score for SA Objective 8 (To promote the sustainable management of waste), as this SA Objective is not locationally specific.

**SA Objective 9: To reduce contribution to climate change**

**Significant positive effects**

Significant positive effect (++)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	SS0299	Land at Poplar Lane	475	Sproughton	Ipswich Policy Area
	SS0433	Land west of Bures Road	46	Great Cornard	Urban Area/Market Town
	SS0502	Angel Court, Angel Street	21	Hadleigh	Urban Area/Market Town
	SS1020*	Land west of Bourne Hill	75	Wherstead	Ipswich Policy Area
	SS1082	Land east of Kings Hill	8	Great Cornard	Urban Area/Market Town
Allocated sites	SS0191	Land north of the A1071	475	Sproughton	Ipswich Policy Area
	SS0242	Land at Tye Farm	500	Great Cornard	Urban Area/Market Town
	SS0298	Land north-east of Frog Hall Lane	600	Hadleigh	Urban Area/Market Town
	SS1024	Land north of the A1071	300	Sproughton	Ipswich Policy Area
Reasonable alternative	SS0509	Land north of Newton Road	12	Sudbury	Urban Area/Market Town
	SS0745	Elm Road/Chilton Lodge Road	5	Sudbury	Urban Area/Market Town
	SS0750	Second Avenue (Garages)	5	Sudbury	Urban Area/Market Town
	SS0909	Land west of Aldham Mill Hill and east of Gallows Hill	80	Hadleigh	Urban Area/Market Town
	SS1185	Land to the south of Poplar Lane	150	Sproughton	Ipswich Policy Area
	SS1283	Land to the north of St Bartholomew's Chapel	350	Long Melford	Urban Area/Market Town
Mid Suffolk District					
Allocated sites that are committed	SS0029 <sup>27</sup>	Land south of Union Road	300	Onehouse	Urban Area/Market Town
	SS0064	Land south of Gun Cotton Way	68	Stowmarket	Urban Area/Market Town
	SS0073	Land north of B1115	143	Stowupland	Urban Area/Market Town
	SS0093	Land east of Green Road	49	Woolpit	Core Village
	SS0530	Former Mid Suffolk District Council Offices and Car Park	64	Needham Market	Urban Area/Market Town
	SS0547	Land south of Old Stowmarket Road	120	Woolpit	Core Village
	SS0636	Land between Bramford Road and the A14	14	Bramford	Ipswich Policy Area
	SS0669	Former Needham Market Middle School	41	Needham Market	Urban Area/Market Town

<sup>27</sup> Site SS0029 was allocated in the Stowmarket Area Action Plan (2013).

Significant positive effect (++)					
	SS1022	Chilton Leys	600	Stowmarket	Urban Area/Market Town
	SS1288	Land east and west of Prentice Road	60	Stowmarket	Urban Area/Market Town
Allocated sites	SS0076	Land north of Church Lane	270	Barham	Ipswich Policy Area
	SS0101	Former Stowmarket Middle School	40	Stowmarket	Urban Area/Market Town
	SS0264	Ashes Farm	575	Stowmarket	Urban Area/Market Town
	SS0614	Land north of Millfield	34	Eye	Urban Area/Market Town
	SS0615	Land at allotments north of Millfield	72	Eye	Urban Area/Market Town
	SS0668	Land south of Creeting Road West	25	Stowmarket	Urban Area/Market Town
	SS0670	Land north-east of The Street	500	Woolpit	Core Village
	SS0672	Land north of Church Street	12	Eye	Urban Area/Market Town
	SS0783	Land west of Heath Road	30	Woolpit	Core Village
	SS0861	Land south of Church Lane	75	Claydon	Ipswich Policy Area
	SS1071	Land south of Stowmarket Road	300	Stowupland	Urban Area/Market Town
	SS1118	Land north of Magdalen Street	80	Eye	Urban Area/Market Town
	SS1202	Land south of Eye Airfield	174	Eye	Urban Area/Market Town
Reasonable alternatives	SS0014	Land north of Maple Way	150	Eye	Urban Area/Market Town
	SS0028	Land north of Barking Road	300	Needham Market	Urban Area/Market Town
	SS0267	Land north of Gracechurch Street	150	Debenham	Core Village
	SS0673	Land north-east of Heath Road	10	Woolpit	Core Village
	SS1070	Land east of Barking Road	120	Barking	Urban Area/Market Town
	SS1239	Land east of Old Ipswich Road	250	Claydon	Ipswich Policy Area

**6.66** The scoring of SA Objective 9 (To reduce contribution to climate change) is a function of criteria relating to walking, cycling and public transport for SA Objective 1 (To improve the health and wellbeing of the population overall and reduce health inequalities), SA Objective 2 (To maintain and improve levels of education and skills in the population overall), SA Objective 3 (To reduce poverty and social exclusion and ensure access to jobs and services) and SA Objective 16 (To enable efficient patterns of movement and modal shift towards sustainable modes of transport). Those sites that scored well against these criteria were considered most likely to provide the opportunity to minimise greenhouse gas emissions from transport.

**6.67** A high number of allocated sites that are committed and allocated sites that are not yet committed have received a

significant positive effect in the significance scoring against SA Objective 9 (To reduce contribution to climate change), as have quite a few of the reasonable alternatives. This is due to the fact these sites perform well against related criteria: 1a (GP surgeries); 1b (Open Space, sport and recreation); 1c (Public Rights of Way); 2a (Primary schools); 2b (Secondary schools); 2c (Further and higher education facilities); 3b (Settlement hierarchy); 3c (Centres of employment); 16a (Rail); 16b (Bus); and 16c (Cycling).

**6.68** Most of the sites receiving significant positive effects are in the Ipswich Fringe, Market Towns and Urban Areas, and to a lesser extent Core Villages. It is also notable that many of the sites have higher dwelling yields, which is important in the sense that higher numbers of homes means that higher

numbers of residents will have the opportunity to access jobs, services and facilities without having to use private transport.

### Significant negative effects

Significant negative effect (-)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	SS0259	Land west of Hadleigh Road	7	Aldham	Hamlet/Countryside
	SS0392	Land west of A137, The Heath	5	Tattingstone	Hamlet/Countryside
	SS0517	Land south-east of Duke Street	6	Hintlesham	Hinterland Village
	SS0628	Land to north of Ipswich Road	9	Nedging-with-Naughton	Hinterland Village
	SS0683	Land to the south-west of Harrow Green	5	Lawshall	Hinterland Village
	SS1125	Land north of Manningtree Road	14	Stutton	Hinterland Village
	SS1289	Land north of MacKenzie Place	51	Cockfield	Hamlet/Countryside
Allocated sites	SS0203	Land south of Main Road	5	Woolverstone	Hamlet/Countryside
	SS0222	Land west of The Causeway	12	Hitcham	Hinterland Village
	SS0255	Land north of Glebe Lane and west of Main Road	5	Woolverstone	Hamlet/Countryside
	SS0258	Land north of The Street	5	Aldham	Hamlet/Countryside
	SS0403	Land south of Hadleigh Road, Calais Street	5	Boxford	Hamlet/Countryside
	SS0507	Council Depot	6	Wenham Magna	Hamlet/Countryside
	SS0512	Land east of Upper Street	8	Stanstead	Hamlet/Countryside
	SS0587	Land south of High Road	40	Leavenheath	Hamlet/Countryside
	SS0593	Land south-west of London Road	12	Copdock and Washbrook	Ipswich Policy Area
	SS0682	Land east of Bury Road	15	Lawshall	Hinterland Village
	SS0752	Land Adjacent to the B1070	12	Holton St Mary	Hamlet/Countryside
	SS1068	Land south of Waldingfield Road	20	Chilton	Hinterland Village
	SS1148	Land east of The Tye	5	Lindsey	Hamlet/Countryside
Reasonable alternative	SS0237	Land west of Bury Road	10	Lawshall	Hinterland Village
	SS0395	Land south of Station Road and west of Bergholt Road	60	Bentley	Hinterland Village
	SS0503	Land north-east of Valley View	5	Stanstead	Hamlet/Countryside
	SS0620	Land west of London Road	25	Copdock and Washbrook	Ipswich Policy Area
	SS0644	Land south of Hadleigh Road	8	Elmsett	Hinterland Village

Significant negative effect (--)					
	SS0685	Land west of Melford Road	5	Lawshall	Hinterland Village
	SS0690	Land south of Lambs Lane	10	Lawshall	Hinterland Village
	SS0874	Land to the south-east of The Street	12	Little Waldingfield	Hamlet/Countryside
	SS1018	Land to the west of A1141	10	Cockfield	Hamlet/Countryside
	SS1044	Land east of Bergholt Road	20	Bentley	Hinterland Village
	SS1238	Land south of The Street	10	Harkstead	Hamlet/Countryside
	SS1257	Land south of Hadleigh Road	5	Boxford	Core Village
Mid Suffolk District					
Allocated sites that are committed	SS0012	Land north of Falconer Avenue	56	Old Newton	Hinterland Village
	SS0020	Land south of The Broadway	13	Badwell Ash	Hinterland Village
	SS0037	Land west of The Street	21	Badwell Ash	Hinterland Village
	SS0040	Land west of Wattisfield Road	60	Walsham-le-Willows	Core Village
	SS0078	Land south-east of Hunston Road	52	Badwell Ash	Hinterland Village
	SS0110	Land east of The Street	8	Wattisfield	Hamlet/Countryside
	SS0131	Land south of Stowmarket Road	64	Old Newton	Hinterland Village
	SS0358	Land north of Top Road	8	Rattlesden	Hamlet/Countryside
	SS0369	Land east of Wattisfield Road	22	Walsham-le-Willows	Core Village
	SS0500	Land east of Mitchery Lane	22	Rattlesden	Hamlet/Countryside
	SS0612	Land east of Bowl Road and north-west of Cobbold Close	9	Battisford	Hamlet/Countryside
	SS0736	Land north of Tostock Road	9	Beyton	Hinterland Village
	SS1088	Land north of Ashfield Road	8	Norton	Hamlet/Countryside
	SS1292	Land north of The Broadway	33	Badwell Ash	Hinterland Village
	SS1293	Land south of Great Bricett Business Park	51	Great Bricett	Hamlet/Countryside
SS1294	Land south of Shop Street	26	Worlingworth	Hamlet/Countryside	
Allocated sites	SS0054	Land north-east of The Street	15	Weybread	Hamlet/Countryside
	SS0084	Land north of The Street	10	Westhorpe	Hamlet/Countryside
	SS0141	Land south of The Street	35	Stonham Aspal	Hinterland Village
	SS0163	Land east of Norwich Road	5	Stonham Parva	Hinterland Village
	SS0380	Land south of Wickham Road	10	Finningham	Hinterland Village
	SS0542	Land south of the B1118	5	Brome & Oakley	Hinterland Village
	SS0558	Land to the south of Long Thurlow Road	10	Badwell Ash	Hamlet/Countryside

Significant negative effect (--)					
	SS0570	Land east of A140 The Street	10	Wetheringsett	Hamlet/Countryside
	SS0573	Land south of Church Road	5	Worlingworth	Hamlet/Countryside
	SS0599	Land to the north-east of the junction between The Street and Cedars Hill	10	Wetheringsett	Hamlet/Countryside
	SS0603	Land north of Barking Road and west of Hascot Hill	10	Barking	Hinterland Village
	SS0678	Land south of Hubbard's Lane and east of The Green	5	Hessett	Hinterland Village
	SS0706	Land to the west of Debenham Way	10	Pettaugh	Hamlet/Countryside
	SS0723	Land to the west of The Street	8	Stoke Ash	Hamlet/Countryside
	SS0786	Land to the south of Wickham Road and west of A140	10	Thwaite	Hinterland Village
	SS0796	Land to the west of B1077	15	Ashbocking	Hamlet/Countryside
	SS0810	Land west of Norwich Road	5	Stonham Parva	Hinterland Village
	SS0814	Land north of Long Thurlow Road	5	Badwell Ash	Hamlet/Countryside
	SS0849	Land west Gislingham Road	10	Finningham	Hinterland Village
	SS0863	Land north of B1123	25	Metfield	Hinterland Village
	SS0869	Land west of Bildeston Road	5	Combs	Hinterland Village
	SS1011	Land north of B1118	10	Brome & Oakley	Hinterland Village
	SS1021	Land south of Church Road	10	Old Newton	Hinterland Village
	SS1058	Land north east of Haggars Mead	20	Stonham Earl	Hinterland Village
	SS1065	Land west of Church Road	10	Beyton	Hinterland Village
	SS1166	Land west of Grange Road	5	Wickham Skeith	Hamlet/Countryside
	SS1188	Land north of Mendlesham Road	5	Cotton	Hamlet/Countryside
	SS1228	Land west of Church Lane	5	Thwaite	Hinterland Village
Reasonable alternatives	SS0735	Land south of Church Road	10	Westhorpe	Hamlet/Countryside
	SS0806	Land north-east of Mill Hill	15	Cotton	Hamlet/Countryside
	SS0809	Land north of Long Thurlow Road	10	Badwell Ash	Hamlet/Countryside
	SS0815	Land south of The Street	5	Hunston	Hamlet/Countryside
	SS0825	Land west of B1118	5	Wilby	Hamlet/Countryside
	SS1187	Land east of Stonham Road	10 <sup>28</sup>	Cotton	Hamlet/Countryside

<sup>28</sup> Based on an assumed density basis.

Significant negative effect (-)					
	SS1189	Land east of Eye Road and north of Church Close, Kenton	10 <sup>29</sup>	Kenton	Hamlet/Countryside
	SS1266	Land south of Half Moon Lane	15	Redgrave	Hinterland Village
	SS1268	Land east of School Lane	8	Coddenham	Hinterland Village
	SS1278	Land to the south of Willow Farm	5	Wilby	Hamlet/Countryside
	SS1279	Land to the west of Brundish Road	5	Wilby	Hamlet/Countryside

**6.69** The sites that receive significant negative effects against SA Objective 9 (To reduce contribution to climate change) perform poorly against related criteria: 1a (GP surgeries); 1b (Open Space, sport and recreation); 1c (Public Rights of Way); 2a (Primary schools); 2b (Secondary schools); 2c (Further and higher education facilities); 3b (Settlement hierarchy); 3c (Centres of employment); 16a (Rail); 16b (Bus) and 16c (Cycling).

**6.70** Nearly all of the sites are located in the Hamlets/Countryside and Hinterlands, with a small number in the Core Villages. However, as nearly all of them are relatively small scale, their contribution to greenhouse gas emissions will not be that great.

#### Possible mitigation

**6.71** Greenhouse gas emissions from vehicles can be mitigated by providing opportunities to use alternative, more sustainable modes of transport, such as walking, cycling and public transport. This can be achieved through site design and layout, and by delivering services and facilities on site, or introducing public transport services, particularly buses.

**6.72** However, given the small scale of these sites, it is considered that such opportunities for mitigation will be limited. The small sites in the Hinterland Villages and Hamlets may help, though, to support the local services and facilities that do already exist.

<sup>29</sup> Based on an assumed density basis.

**SA Objective 10: To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change**

**Significant positive effects**

**6.73** It is not possible for any site to score a significant positive effect against SA Objective 10 (To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change) because in general development will not have beneficial effects on flood risk.

**6.74** There may be occasional instances where development could include flood management measures that will reduce the existing risk of flooding but it was not possible to take these into account at this stage of the SA process, if any exist at all. The assessment was therefore focused on the flood risk of sites.

**Significant negative effects**

Significant negative effect (--)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	SS0179	Land east of Church Road	34	Stutton	Hinterland Village
	SS0200	Land east of Valley Road	32	Great Waldingfield	Hinterland Village
	SS0502	Angel Court, Angel Street	21	Hadleigh	Urban Area/Market Town
	SS1082	Land east of Kings Hill	8	Great Cornard	Urban Area/Market Town
	SS1289	Land north of MacKenzie Place	51	Cockfield	Hamlet/Countryside
Allocated sites	SS0537	Former Babergh District Council Offices	50	Hadleigh	Urban Area/Market Town
Reasonable alternative	SS0220	Land south of Davidson Close	120	Great Cornard	Urban Area/Market Town
	SS0232	Land south of Whatfield Road	20	Elmsett	Hinterland Village
	SS0292	Land west of Sand Hill	60	Boxford	Core Village
	SS0303	Land east of Frog Hall Lane	300	Hadleigh	Urban Area/Market Town
	SS0395	Land south of Station Road and west of Bergholt Road	60	Bentley	Hinterland Village
	SS0909	Land west of Aldham Mill Hill and east of Gallows Hill	80	Hadleigh	Urban Area/Market Town
	SS1018	Land to the west of A1141	10	Cockfield	Hamlet/Countryside
	SS1110	Land west of Duffs Hill	25	Glemsford	Core Village
	SS1177	Land north of Sproughton Road	1000	Sproughton	Ipswich Policy Area

Significant negative effect (--)					
Mid Suffolk District					
Allocated sites that are committed	SS0009	Land between Jack's Green Road and A14	43	Creeting St Mary	Urban Area/Market Town
	SS0033	Land west of Old Norwich Road	190	Whitton	Ipswich Policy Area
	SS0037	Land west of The Street	21	Badwell Ash	Hinterland Village
	SS0073	Land north of B1115	143	Stowupland	Urban Area/Market Town
	SS0078	Land south-east of Hunston Road	52	Badwell Ash	Hinterland Village
	SS0096	Land south of Church Road	38	Elmswell	Core Village
	SS0099	Land north-east of Turkey Hall Lane	51	Bacton	Core Village
	SS0478	Land east of The Street	190	Bramford	Ipswich Policy Area
	SS0612	Land east of Bowl Road and north-west of Cobbold Close	9	Battisford	Hamlet/Countryside
	SS0616	Land east of Mill Road	13	Laxfield	Hinterland Village
	SS0765	Land to the West of Church Road	15	Thurston	Core Village
	SS0949	Land north of Mill Road	69	Botesdale & Rickinghall	Core Village
	SS1043	Land south of New Street	60	Stradbroke	Core Village
	SS1056	Land north of Pesthouse Lane	20	Barham	Ipswich Policy Area
Allocated sites	SS0065	Land south of Glebe Way	75	Mendlesham	Core Village
	SS0264	Ashes Farm	575	Stowmarket	Urban Area/Market Town
	SS0570	Land east of A140 The Street	10	Wetheringsett	Hamlet/Countryside
	SS0654	Land south of Chalk Hill Lane and West of Hood Drive	8	Great Blakenham	Ipswich Policy Area
	SS0668	Land south of Creeting Road West	25	Stowmarket	Urban Area/Market Town
	SS0723	Land to the west of The Street	8	Stoke Ash	Hamlet/Countryside
	SS0783	Land west of Heath Road	30	Woolpit	Core Village
	SS0861	Land south of Church Lane	75	Claydon	Ipswich Policy Area
	SS0863	Land north of B1123	25	Metfield	Hinterland Village
	SS0902	Land south of Low Road	18	Debenham	Core Village
	SS1188	Land north of Mendlesham Road	5	Cotton	Hamlet/Countryside
SS1198	Land north of Laxfield Road	45	Stradbroke	Core Village	
Reasonable alternatives	SS0028	Land north of Barking Road	300	Needham Market	Urban Area/Market Town
	SS0105	Land between Ixworth Road and Hawes Lane	12	Norton	Hinterland Village
	SS0575	Land east of Queen Street	30	Stradbroke	Core Village

Significant negative effect (--)					
	SS0642	Land to the north of Low Road	250	Debenham	Core Village
	SS1106	Land south of Gipping Road	100	Stowupland	Core Village
	SS1153	Land south-west of Stowmarket Road	134	Needham Market	Urban Area/Market Town
	SS1239	Land east of Old Ipswich Road	250	Claydon	Ipswich Policy Area

**6.75** Quite a few sites, particularly in Mid Suffolk, receive significant negative effects against SA Objective 10 (To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change), including allocated sites that are committed, allocated sites that are not yet committed, and reasonable alternatives. These sites score a significant negative effect in relation to this objective because they contain land with a 1 in 30 year risk of surface water flooding. One of the sites, SS0009 (Land between Jack's Green Road and A14, Creeting St Mary), also falls within Flood Zone 3 and is therefore at an even greater risk of flooding. However, this site already has planning consent. No other site has more than 25% of its area in Flood Zone 3.

**6.76** BMSDC's Strategic Flood Risk Assessment (SFRA) lists any sites in the JLP area that are at risk of the following types of flooding: fluvial, tidal, surface water, groundwater, sewers and reservoir inundation. According to the SFRA, the most significant sources of flooding are fluvial and surface water.

**6.77** The sites identified in the SFRA as being at risk of fluvial flooding are: SS1288 (Land east and west of Prentice Road, Stowmarket); SS0537 (Former Babergh District Council Offices, Hadleigh); SS0009 (Land between Jack's Green Road and A14, Creeting St Mary); SS0418 (Land south-east of Benton Street, Hadleigh); SS0909 (Land west of Aldham Mill Hill and east of Gallows Hill, Hadleigh); SS0902 (Land south of Low Road, Debenham); SS0065 (Land south of Glebe Way, Mendlesham); SS1177 (Land north of Sproughton Road, Sproughton); SS1020 (Land west of Bourne Hill, Wherstead); SS0765 (Land to the West of Church Road, Thurston); SS0264 (Ashes Farm, Stowmarket); and SS0711 (Land east of Loraine Way, Sproughton). All of these sites, with the exception of SS01288, SS0418, SS1020 and SS0711, are listed in the above table. Sites SS1288 and SS0418 are not listed because they are located in Flood Zone 2, not Flood Zone 3. Sites SS1020 and SS0711 are not listed because according to national data, they do not fall within either Flood Zone 2 or 3. However, SS0711 does contain land with a 1 in 100 year risk of surface water flooding. These differences are as a result of disparities in data.

**6.78** The SFRA identified the following sites as being at risk of surface water flooding: SS1056 (Land north of Pesthouse

Lane, Barham); SS0575 (Land east of Queen Street, Stradbroke); SS1018 (Land to the west of A1141, Cockfield); SS0723 (Land to the west of The Street, Stoke Ash); SS0668 (Land south of Creeting Road West, Stowmarket); SS0537 (Former Babergh District Council Offices, Hadleigh); SS0502 (Angel Court, Angel Street, Hadleigh); SS0902 (Land south of Low Road, Debenham); SS1198 (Land north of Laxfield Road, Stradbroke); SS0009 (Land between Jack's Green Road and A14, Creeting St Mary); SS0179 (Land east of Church Road, Stutton); SS1153 (Land south-west of Stowmarket Road, Needham Market); SS0861 (Land south of Church Lane, Claydon); SS0909 (Land west of Aldham Mill Hill and east of Gallows Hill, Hadleigh); SS0096 (Land south of Church Road, Elmswell); SS0395 (Land south of Station Road and west of Bergholt Road, Bentley); and SS0478 (Land east of The Street, Bramford). All of these sites are listed in the above table as having a significant negative effect against SA Objective 10.

**6.79** With regard to tidal flooding, the SFRA identified one residential site as being at risk: SS1020 (Land west of Bourne Hill, Wherstead). This site did not receive a significant negative effect against SA Objective 10.

**6.80** The SFRA identified the following sites as being at risk of groundwater flooding: SS0145 (Land west of Main Road, Somersham); SS1056 (Land north of Pesthouse Lane, Barham); SS1268 (Land east of School Lane, Coddensham); SS0902 (Land south of Low Road, Debenham); SS1289 (Land north of MacKenzie Place, Cockfield); SS0433 (Land west of Bures Road, Great Cornard); SS0009 (Land between Jack's Green Road and A14, Creeting St Mary); and SS1177 (Land north of Sproughton Road, Sproughton). In the SFRA, sewer and reservoir inundation data were not provided in a format to screen against the sites.

#### Possible mitigation

**6.81** Sites that have a greater risk of fluvial flooding from overflowing rivers can be protected from flooding by flood defences, and the areas of land at most risk from flooding on a site can be protected from development. Surface water flooding can be mitigated through the use of sustainable drainage systems.

**6.82** It should be noted that the 'policy-off' SA used nationally available datasets on flood risk. A separate Strategic Flood Risk Assessment has been undertaken on behalf of BMSDC, which has provided more detailed assessment of specific sites in the two Districts, which has helped to inform site selection and mitigation measures.

## SA Objective 11: To conserve and enhance biodiversity and geodiversity

### Significant positive effects

**6.83** Under the site appraisal methodology, it is not possible for any site to score a significant positive effect against SA Objective 11 (To conserve and enhance biodiversity and geodiversity).

**6.84** It is recognised that some sites may provide greater opportunities for biodiversity enhancement than others, but this information was not available on a consistent basis for all sites. In any event, the NPPF requires biodiversity net gain to be achieved in all development.

**6.85** The primary focus of the site appraisals was therefore on the prevention of harm to biodiversity assets. It should be noted that this is not a straightforward process. The

internationally and nationally designated sites represent the most 'valuable' biodiversity assets, but locally designated sites are also important. Similarly, priority habitats play an important role in maintaining and supporting biodiversity in general. Therefore, given the importance of ecological networks and mosaics of habitats in supporting biodiversity, all such designations were given considerable weight in the site appraisals. Apart from designated sites, Impact Risk Zones defined for Sites of Special Scientific Interest (SSSIs) by Natural England were taken into account. Similarly, buffer zones were delineated for other designated sites and priority habitats to recognise that development close to them could also harm their biodiversity interest.

### Significant negative effects<sup>30</sup>

Significant negative but uncertain effect (–?)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	SS0179	Land east of Church Road	34	Stutton	Hinterland Village
	SS0181	Land north-west of Moores Lane	144	East Bergholt	Core Village
	SS0182	Land south of Heath Road	75	East Bergholt	Core Village
	SS0251	Land east of Longfield Road	100	Capel St Mary	Core Village
	SS0259	Land west of Hadleigh Road	7	Aldham	Hamlet/Countryside
	SS0299	Land at Poplar Lane	475	Sproughton	Ipswich Policy Area
	SS0433	Land west of Bures Road	46	Great Cornard	Urban Area/Market Town
	SS0591	6 Acre Field	14	Belstead	Ipswich Policy Area
	SS0717	Land east of Ipswich Road	7	Holbrook	Core Village
	SS0812	Land east of the B1064	150	Long Melford	Core Village
	SS0872	Land east of Richardson Lane	24	Chelmondiston	Hinterland Village
	SS1020	Land west of Bourne Hill	75	Wherstead	Ipswich Policy Area
	SS1082	Land east of Kings Hill	8	Great Cornard	Urban Area/Market Town
	SS1121	Land north-west of Waldingfield Road	130	Chilton	Urban Area/Market Town
SS1197	Land west of Hadleigh Road	10	East Bergholt	Core Village	

<sup>30</sup> All significant negative effects against this objective are recorded as uncertain depending on whether they can be mitigated or not.

Significant negative but uncertain effect (--?)					
	SS1289	Land north of MacKenzie Place	51	Cockfield	Hamlet/Countryside
Allocated sites	SS0185	Land south of Ipswich Road	125	Brantham	Core Village
	SS0191	Land north of the A1071	475	Sproughton	Ipswich Policy Area
	SS0203	Land south of Main Road	5	Woolverstone	Hamlet/Countryside
	SS0204	Land south of B1456	15	Chelmondiston	Hinterland Village
	SS0208	Land south of The Street	50	Shotley	Core Village
	SS0223	Land north of Burstall Lane and West of B1113	105	Sproughton	Ipswich Policy Area
	SS0242	Land at Tye Farm	500	Great Cornard	Urban Area/Market Town
	SS0255	Land north of Glebe Lane and west of Main Road	5	Woolverstone	Hamlet/Countryside
	SS0258	Land north of The Street	5	Aldham	Hamlet/Countryside
	SS0295	Land south-east of Back Lane	226	Copdock and Washbrook	Ipswich Policy Area
	SS0298	Land north-east of Frog Hall Lane	600	Hadleigh	Urban Area/Market Town
	SS0465	Land north of B1068 and east of Sudbury Road	8	Stoke by Nayland	Hinterland Village
	SS0512	Land east of Upper Street	8	Stanstead	Hamlet/Countryside
	SS0537	Former Babergh District Council Offices	50	Hadleigh	Urban Area/Market Town
	SS0584	Land north of Red Hill Road/ Malyon Road	75	Hadleigh	Urban Area/Market Town
	SS0593	Land south-west of London Road	12	Copdock and Washbrook	Ipswich Policy Area
	SS0637	Land south-west of Rembrow Road	30	Capel St Mary	Core Village
	SS0682	Land east of Bury Road	15	Lawshall	Hinterland Village
	SS0711	Land east of Loraine Way	50	Sproughton	Ipswich Policy Area
	SS0752	Land Adjacent to the B1070	12	Holton St Mary	Hamlet/Countryside
	SS0754	Claypits Avenue (Garages)	5	Bures St Mary	Core Village
	SS0877	Land north of Woodlands Road	10	Raydon	Hinterland Village
	SS0910	Land south-west of Rembrow Road	520	Capel St Mary	Core Village
SS1024	Land north of the A1071	300	Sproughton	Ipswich Policy Area	
SS1148	Land east of The Tye	5	Lindsey	Hamlet/Countryside	
SS1155	Land north of Goldenlond	10	Stoke By Nayland	Hinterland Village	
Reasonable alternative	SS0211	Land west of Brantham Hill	50	Brantham	Core Village
	SS0220	Land south of Davidson Close	120	Great Cornard	Urban Area/Market Town
	SS0232	Land south of Whatfield Road	20	Elmsett	Hinterland Village

Significant negative but uncertain effect (--?)					
	SS0233	Land north-east of Ipswich Road	15	Elmsett	Hinterland Village
	SS0237	Land west of Bury Road	10	Lawshall	Hinterland Village
	SS0286	Land south of Kings Road	100	Glemsford	Core Village
	SS0303	Land east of Frog Hall Lane	300	Hadleigh	Urban Area/Market Town
	SS0395	Land south of Station Road and west of Bergholt Road	60	Bentley	Hinterland Village
	SS0418	Land south-east of Benton Street	15	Hadleigh	Urban Area/Market Town
	SS0509	Land north of Newton Road	12	Sudbury	Urban Area/Market Town
	SS0590	Land east of Waldringfield Road and north of Church Field Road	25	Chilton	Urban Area/Market Town
	SS0685	Land west of Melford Road,	5	Lawshall	
	SS0745	Elm Road/Chilton Lodge Road	5	Sudbury	Urban Area/Market Town
	SS0867	Land to the north-east of Pond Hall Lane	30	Hadleigh	Urban Area/Market Town
	SS0909	Land west of Aldham Mill Hill and east of Gallows Hill	80	Hadleigh	Urban Area/Market Town
	SS0968	Highfield Mill	5	Sudbury	Urban Area/Market Town
	SS1019	Land west of Ballingdon Hill and south of Sandy Lane	60	Sudbury	Urban Area/Market Town
	SS1044	Land east of Bergholt Road	20	Bentley	Hinterland Village
	SS1110	Land west of Duffs Hill	25	Glemsford	Core Village
	SS1177	Land north of Sproughton Road	1000	Sproughton	Ipswich Policy Area
	SS1185	Land to the south of Poplar Lane	150	Sproughton	Ipswich Policy Area
	SS1205	Land west of Rodbridge Hill	30	Long Melford	Core Village
	SS1238	Land south of The Street	10	Harkstead	Hamlet/Countryside
	SS1257	Land south of Hadleigh Road	5	Boxford	Core Village
Mid Suffolk District					
Allocated sites that are committed	SS0004	Land south of Bacton Road	98	Haughley	Core Village
	SS0006	Land west of Barton Road	129	Thurston	Core Village
	SS0009	Land between Jack's Green Road and A14	43	Creeting St Mary	Urban Area/Market Town
	SS0012	Land north of Falconer Avenue	56	Old Newton	Hinterland Village
	SS0020	Land south of The Broadway	13	Badwell Ash	Hinterland Village
	SS0029 <sup>31</sup>	Land south of Union Road	300	Onehouse	Urban Area/Market Town

<sup>31</sup> Site SS0029 was allocated in the Stowmarket Area Action Plan (2013).

Significant negative but uncertain effect (--?)					
	SS0033	Land west of Old Norwich Road	190	Whitton	Ipswich Policy Area
	SS0037	Land west of The Street	21	Badwell Ash	Hinterland Village
	SS0047	Land west of Fishponds Way	65	Haughley	Core Village
	SS0058	Land between Oatfields and Stradbroke Road	18	Fressingfield	Hinterland Village
	SS0064	Land south of Gun Cotton Way	68	Stowmarket	Urban Area/Market Town
	SS0069	Land south of Framlingham Road	49	Laxfield	Hinterland Village
	SS0078	Land south-east of Hunston Road	52	Badwell Ash	Hinterland Village
	SS0110	Land east of The Street	8	Wattisfield	Hamlet/Countryside
	SS0129	Land south of Back Hills	40	Botesdale & Rickinghall	Core Village
	SS0453	Land north of Stoke Road and west of Clint Road	20	Thorndon	Hinterland Village
	SS0478	Land east of The Street	190	Bramford	Ipswich Policy Area
	SS0530	Former Mid Suffolk District Council Offices and Car Park	64	Needham Market	Urban Area/Market Town
	SS0547	Land south of Old Stowmarket Road	120	Woolpit	Core Village
	SS0550	Land east of Withersdale Road, opposite Mendham Primary School	6	Mendham	Hinterland Village
	SS0636	Land between Bramford Road and the A14	14	Bramford	Ipswich Policy Area
	SS0669	Former Needham Market Middle School	41	Needham Market	Urban Area/Market Town
	SS0765	Land to the West of Church Road	15	Thurston	Core Village
	SS0818	Land south of B1113 Hall Lane, opposite junction with Half Moon Lane	9	Redgrave	Hinterland Village
	SS0860	Land to the east of Pear Tree Place	21	Great Finborough	Hinterland Village
	SS1022	Chilton Leys	600	Stowmarket	Urban Area/Market Town
	SS1056	Land north of Pesthouse Lane	20	Barham	Ipswich Policy Area
	SS1288	Land east and west of Prentice Road	60	Stowmarket	Urban Area/Market Town
	SS1292	Land north of The Broadway	33	Badwell Ash	Hinterland Village
	SS1293	Land south of Great Bricett Business Park	51	Great Bricett	Hamlet/Countryside
Allocated sites	SS0031	Land north of Ipswich Road	140	Debenham	Core Village
	SS0039	Land north of Church Road	60	Elmswell	Core Village
	SS0042	Land west of Old Ipswich Road	20	Yaxley	Hinterland Village
	SS0076	Land north of Church Lane	270	Barham	Ipswich Policy Area
	SS0079	Land west of Queen Street	75	Stradbroke	Core Village

Significant negative but uncertain effect (--?)					
SS0084	Land north of The Street	10	Westhorpe	Hamlet/Countryside	
SS0090	Land east of Church Road and south of Old Post Office Lane	25	Thurston	Core Village	
SS0121	Land south of Fitzgerald Road	100	Bramford	Ipswich Policy Area	
SS0141	Land south of The Street	35	Stonham Aspal	Hinterland Village	
SS0145	Land west of Main Road	30	Somersham	Hinterland Village	
SS0157 <sup>32</sup>	Land south of Union Road	100	Onehouse	Urban Area/Market Town	
SS0264	Ashes Farm	575	Stowmarket	Urban Area/Market Town	
SS0268	Land east of Aspoll Road	87	Debenham	Core Village	
SS0319	Land south of Heath Road	110	Thurston	Core Village	
SS0343	Land south of Forest Road	10	Onehouse	Urban Area/Market Town	
SS0513	Land between New Road and Leys Road	5	Tostock	Hinterland Village	
SS0542	Land south of the B1118	5	Brome & Oakley	Hinterland Village	
SS0551	Land east of Norwich Road	325	Barham	Ipswich Policy Area	
SS0570	Land east of A140 The Street	10	Wetheringsett	Hamlet/Countryside	
SS0599	Land to the north-east of the junction between The Street and Cedars Hill	10	Wetheringsett	Hamlet/Countryside	
SS0654	Land south of Chalk Hill Lane and West of Hood Drive	8	Great Blakenham	Ipswich Policy Area	
SS0668	Land south of Creeting Road West	25	Stowmarket	Urban Area/Market Town	
SS0670	Land north-east of The Street	500	Woolpit	Core Village	
SS0678	Land south of Hubbard's Lane and east of The Green	5	Hessett	Hinterland Village	
SS0698	Land to the south-west of Yaxley Road	5	Mellis	Hinterland Village	
SS0728	Land to the south of Denham Road	30	Hoxne	Hinterland Village	
SS0729	Land south of Beyton Road	200	Thurston	Core Village	
SS0786	Land to the south of Wickham Road and west of A140	10	Thwaite	Hinterland Village	
SS0796	Land to the west of B1077	15	Ashbocking	Hamlet/Countryside	
SS0832	Land west of Main Road	45	Henley	Hinterland Village	
SS0861	Land south of Church Lane	75	Claydon	Ipswich Policy Area	
SS0902	Land south of Low Road	18	Debenham	Core Village	
SS1011	Land north of B1118	10	Brome & Oakley	Hinterland Village	

<sup>32</sup> Site SS0157 was allocated in the Stowmarket Area Action Plan (2013).

Significant negative but uncertain effect (--?)					
	SS1058	Land north east of Haggars Mead	20	Stonham Earl	Hinterland Village
	SS1071	Land south of Stowmarket Road	300	Stowupland	Urban Area/Market Town
	SS1118	Land north of Magdalen Street	80	Eye	Urban Area/Market Town
	SS1198	Land north of Laxfield Road	45	Stradbroke	Core Village
Reasonable alternatives	SS0014	Land north of Maple Way	150	Eye	Urban Area/Market Town
	SS0028	Land north of Barking Road	300	Needham Market	Urban Area/Market Town
	SS0105	Land between Ixworth Road and Hawes Lane	12	Norton	Hinterland Village
	SS0119	Land west of Old Ipswich Road	21	Claydon	Ipswich Policy Area
	SS0171	Land south of Ashbocking Road	20	Henley	Hinterland Village
	SS0267	Land north of Gracechurch Street	150	Debenham	Core Village
	SS0575	Land east of Queen Street	30	Stradbroke	Core Village
	SS0864	Land north of Gipping Road	20	Great Blakenham	Ipswich Policy Area
	SS0952	Land south of Gipping Road	10	Great Blakenham	Ipswich Policy Area
	SS1055	Land west of High Road	25	Great Finborough	Hinterland Village
	SS1070	Land east of Barking Road	120	Barking	Urban Area/Market Town
	SS1153	Land south-west of Stowmarket Road	134	Needham Market	Urban Area/Market Town
	SS1187	Land east of Stonham Road	10 <sup>33</sup>	Cotton	Hamlet/Countryside
	SS1239	Land east of Old Ipswich Road	250	Claydon	Ipswich Policy Area
	SS1266	Land south of Half Moon Lane	15	Redgrave	Hinterland Village
	SS1268	Land east of School Lane	8	Coddenham	Hinterland Village

**6.86** It can be seen from the above tables that large numbers of sites, whether allocated and committed, allocated and not yet committed, or reasonable alternatives could have significant negative but uncertain effects against SA Objective 11 (To conserve and enhance biodiversity and geodiversity).

**6.87** A number of sites also score poorly against this objective because 25% or more of their land falls within the 'All consultations' SSSI Impact Risk Zone and/or the 'Residential' SSSI Impact Risk Zone for the proposed dwelling capacity.

**6.88** The following 27 sites contain 25% or more land that falls within the 'All consultations' SSSI Impact Risk Zone and therefore fall within the vicinity of a SSSI: SS0006 (Land west of Barton Road, Thurston); SS0033 (Land west of Old Norwich

Road, Whitton); SS0076 (Land north of Church Lane, Barham); SS0119 (Land west of Old Ipswich Road, Claydon); SS0121 (Land south of Fitzgerald Road, Bramford); SS0145 (Land west of Main Road, Somersham); SS0203 (Land south of Main Road, Woolverstone); SS0204 (Land south of B1456, Chelmondiston); SS0208 (Land south of The Street, Shotley); SS0211 (Land west of Brantham Hill, Brantham); SS0223 (Land north of Burstall Lane and West of B1113, Sproughton); SS0255 (Land north of Glebe Lane and west of Main Road, Woolverstone); SS0319 (Land south of Heath Road, Thurston); SS0478 (Land east of The Street, Bramford); SS0551 (Land east of Norwich Road, Barham); SS0636 (Land between Bramford Road and the A14, Bramford); SS0654 (Land south of Chalk Hill Lane and West of Hood Drive, Great

<sup>33</sup> Based on an assumed density basis.

Blakenham); SS0711 (Land east of Loraine Way, Sproughton); SS0861 (Land south of Church Lane, Claydon); SS0864 (Land north of Gipping Road, Great Blakenham); SS0872 (Land east of Richardson Lane, Chelmondiston); SS0952 (Land south of Gipping Road, Great Blakenham); SS1020 (Land west of Bourne Hill, Wherstead); SS1056 (Land north of Pesthouse Lane, Barham); SS1177 (Land north of Sproughton Road, Sproughton); SS1238 (Land south of The Street, Harkstead); and SS1268 (Land east of School Lane, Coddendam). All of these sites with the exception of SS0006 (Land west of Barton Road, Thurston) and SS0319 (Land south of Heath Road, Thurston) also contain 25% of more of land within the 'Residential SSSI Impact Risk Zone'.

**6.89** The following 67 sites also contain 25% or more of land within the 'Residential' SSSI Impact Risk Zone: SS0028 (Land north of Barking Road, Needham Market); SS0171 (Land south of Ashbocking Road, Henley); SS0179 (Land east of Church Road, Stutton); SS0181 (Land north-west of Moores Lane, East Bergholt); SS0182 (Land south of Heath Road, East Bergholt); SS0185 (Land south of Ipswich Road, Brantham); SS0191 (Land north of the A1071, Sproughton); SS0212 (Land west of Hadleigh Road, Elmsett); SS0220 (Land south of Davidson Close, Sudbury); SS0226 (Land south-east of George Lane, Glemsford); SS0232 (Land south of Whatfield Road, Elmsett); SS0233 (Land north-east of Ipswich Road, Elmsett); SS0251 (Land east of Longfield Road, Capel St Mary); SS0258 (Land north of The Street, Aldham); SS0259 (Land west of Hadleigh Road, Aldham); SS0286 (Land south of Kings Road, Glemsford); SS0295 (Land south-east of Back Lane, Copdock and Washbrook); SS0298 (Land north-east of Frog Hall Lane, Hadleigh); SS0299 (Land at Poplar Lane, Sproughton); SS0303 (Land east of Frog Hall Lane, Hadleigh); SS0392 (Land west of A137, The Heath, Tattingstone); SS0395 (Land south of Station Road and west of Bergholt Road, Bentley); SS0418 (Land south-east of Benton Street, Hadleigh); SS0433 (Land west of Bures Road, Great Cornard); SS0465 (Land north of B1068 and east of Sudbury Road, Stoke by Nayland); SS0502 (Angel Court, Angel Street, Hadleigh); SS0503 (Land north-east of Valley View, Stanstead); SS0507 (Council Depot, Wenham Magna); SS0512 (Land east of Upper Street, Stanstead); SS0517 (Land south-east of Duke Street, Hintlesham); SS0537 (Former Babergh District Council Offices, Hadleigh); SS0558 (Land to the south of Long Thurlow Road, Long Thurlow); SS0584 (Land north of Red Hill Road/ Malyon Road, Hadleigh); SS0591 (6 Acre Field, Belstead); SS0593 (Land south-west of London Road, Copdock and Washbrook); SS0603 (Land north of Barking Road and west of Hascot Hill, Barking); SS0620 (Land west of London Road, Copdock and Washbrook); SS0636 (Land between Bramford Road and the A14, Bramford); SS0637 (Land south-west of Rembrow Road, Capel St Mary); SS0644 (Land south of Hadleigh Road, Elmsett); SS0683 (Land to the

south-west of Harrow Green, Lawshall); SS0696 (Land north of Holbrook Road, Stutton); SS0709 (Land to the south-east of Butt Road, Stoke-by-Nayland); SS0717 (Land east of Ipswich Road, Holbrook); SS0752 (Land Adjacent to the B1070, Holton St Mary); SS0796 (Land to the west of B1077, Ashbocking); SS0809 (Land north of Long Thurlow Road, Long Thurlow); SS0814 (Land north of Long Thurlow Road, Badwell Ash); SS0820 (Land west of Church Lane, Bentley); SS0832 (Land west of Main Road, Henley); SS0863 (Land north of B1123, Metfield); SS0867 (Land to the north-east of Pond Hall Lane, Hadleigh); SS0877 (Land north of Woodlands Road, Raydon); SS0880 (Land east of The Street, Raydon); SS0909 (Land west of Aldham Mill Hill and east of Gallows Hill, Hadleigh); SS0910 (Land south-west of Rembrow Road, Capel St Mary); SS0954 (Land to the west of Hadleigh Road, Sproughton); SS1024 (Land north of the A1071, Sproughton); SS1044 (Land east of Bergholt Road, Bentley); SS1060 (Land west of Noaks Road, Raydon); SS1110 (Land west of Duffs Hill, Glemsford); SS1125 (Land north of Manningtree Road, Stutton); SS1155 (Land north of Goldenlond, Stoke By Nayland); SS1185 (Land to the south of Poplar Lane, Sproughton); SS1197 (Land west of Hadleigh Road, East Bergholt); SS1257 (Land south of Hadleigh Road, Boxford); and SS1268 (Land east of School Lane, Coddendam).

**6.90** A large number of sites score poorly against this objective due to the fact they are located within 250m of a Local Nature Reserve or County Wildlife Site and/or 100m of a priority habitat or ancient woodland.

**6.91** Two of the sites listed above overlap a Local Nature Reserve: SS0242 (Land at Tye Farm, Great Cornard) and SS0812 (Land east of the B1064, Long Melford), albeit by less than 1%. Four sites overlap a County Wildlife Site: SS0191 (Land north of the A1071, Sproughton); SS0698 (Land to the south-west of Yaxley Road, Mellis); SS0812 (Land east of the B1064, Long Melford); and SS1177 (Land north of Sproughton Road, Sproughton). The latter two of these sites overlap a County Wildlife Site by less than 1%, whilst SS0191 overlaps a County Wildlife Site by around 6% and SS0698 by just under 4%. One site, SS1177: Land north of Sproughton Road, also overlaps an area of ancient woodland by less than 1%.

**6.92** There are 31 sites that overlap a Priority Habitat, 14 of which are by less than 1%. These sites are located directly adjacent to a Priority Habitat and subsequently there is some overlap: SS0047 (Land west of Fishponds Way, Haughley); SS0191 (Land north of the A1071, Sproughton); SS0237 (Land west of Bury Road, Lawshall); SS0433 (Land west of Bures Road, Great Cornard); SS0547 (Land south of Old Stowmarket Road, Woolpit); SS0584 (Land north of Red Hill Road/ Malyon Road, Hadleigh); SS0682 (Land east of Bury Road, Lawshall); SS0729 (Land south of Beyton Road, Thurston); SS0765 (Land to the West of Church Road, Thurston); SS0812 (Land east of the B1064, Long Melford);

SS0861 (Land south of Church Lane, Claydon); SS1020 (Land west of Bourne Hill, Wherstead); SS1118 (Land north of Magdalen Street, Eye); and SS1177 (Land north of Sproughton Road, Sproughton). The remaining sites overlap a Priority Habitat by more than 1%. The highest of these are SS1011 (Land north of B1118, Oakley) and SS0465 (Land north of B1068 and east of Sudbury Road, Stoke by Nayland). SS1011 falls entirely within a coastal and floodplain grazing marsh priority habitat, whilst SS0465 comprises a deciduous woodland priority habitat. These sites are closely followed by SS0058 (Land between Oatfields and Stradbroke Road, Fressingfield) and SS1268 (Land east of School Lane, Coddendam), which both contain a deciduous woodland priority habitat. Approximately 70% of SS0058 contains the priority habitat, whilst just over 60% of SS1268 does. Sites SS0575 (Land east of Queen Street, Stradbroke) and SS0668 (Land south of Creting Road West, Stowmarket) contain around 20% of a deciduous woodland priority habitat, whilst site SS0129 (Land south of Back Hills, Botesdale and Rickinghall) contains around 17% and SS0078 around 14%. Sites SS0637 (Land south-west of Rembrow Road, Capel St Mary) and SS1153 (Land south-west of Stowmarket Road, Needham Market) contain just over 11% of a priority habitat. The remaining seven sites contain less than 10% of Priority Habitat but more than 1%. They are: SS0028 (Land north of Barking Road, Needham Market) – 6.6%; SS0299 (Land at Poplar Lane, Sproughton) – 5.4%; SS1055 (Land west of High Road, Great Finborough) – 2.8%; SS1121 (Land south of Church Road, Old Newton) – 2.5%; SS1071 (Land south of Stowmarket Road, Stowupland) – 2.1%; SS0264 (Ashes Farm, Stowmarket) – 1.8%; and SS0141 (Land south of The Street, Stonham Aspal) – 1.2%.

### Possible mitigation

**6.93** It is important to note that the above assessment of sites is prior to mitigation. There are often many opportunities to provide mitigation. These can include avoiding development of the most sensitive parts of the site and including buffer zones, planting or erecting barriers or buffers to prevent disturbance, creation or improvement of habitats particularly where the existing biodiversity interest is low, including within development new ecological links, such as hedgerows and wetlands (for example, through sustainable drainage systems) that link habitats where currently there are gaps, the incorporation of artificial nesting and roosting boxes and areas, and so on.

**6.94** However, avoidance of harm to existing habitats and biodiversity interest should be the priority in the first instance, which is why the above overlaps with designated sites and priority habitats have been highlighted.

## SA Objective 12: To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings

### Significant positive effects

**6.95** Under the site appraisal methodology, it is not possible for any site to score a significant positive effect against SA Objective 12 (To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings).

**6.96** In practice, there may be instances where new development can actually improve the setting of historic assets or bring heritage assets at risk back into beneficial use. The site appraisals have been guided by a separate Heritage Impact Assessment undertaken by LUC.

### Significant negative effects<sup>34</sup>

Significant negative but uncertain effect (–?)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	SS0200	Land east of Valley Road	32	Great Waldingfield	Hinterland Village
	SS0259	Land west of Hadleigh Road	7	Aldham	Hamlet/Countryside
	SS0299	Land at Poplar Lane	475	Sproughton	Ipswich Policy Area
	SS0517	Land south-east of Duke Street	6	Hintlesham	Hinterland Village
	SS1121	Land north-west of Waldingfield Road	130	Chilton	Urban Area/Market Town
Allocated sites	SS0185	Land south of Ipswich Road	125	Brantham	Core Village
	SS0191	Land north of the A1071	475	Sproughton	Ipswich Policy Area
	SS0203	Land south of Main Road	5	Woolverstone	Hamlet/Countryside
	SS0208	Land south of The Street	50	Shotley	Core Village
	SS0222	Land west of The Causeway	12	Hitcham	Hinterland Village
	SS0255	Land north of Glebe Lane and west of Main Road	5	Woolverstone	Hamlet/Countryside
	SS0295	Land south-east of Back Lane	226	Copdock and Washbrook	Ipswich Policy Area
	SS0465	Land north of B1068 and east of Sudbury Road	8	Stoke by Nayland	Hinterland Village
	SS0507	Council Depot	6	Wenham Magna	Hamlet/Countryside
	SS0512	Land east of Upper Street	8	Stanstead	Hamlet/Countryside
	SS0537	Former Babergh District Council Offices	50	Hadleigh	Urban Area/Market Town
	SS0709	Land to the south-east of Butt Road	8	Stoke by Nayland	Hinterland Village
	SS0711	Land east of Loraine Way	50	Sproughton	Ipswich Policy Area

<sup>34</sup> All significant negative effects against this objective are recorded as uncertain depending on whether they can be mitigated or not.

Significant negative but uncertain effect (--?)					
	SS0910	Land south-west of Rembrow Road	520	Capel St Mary	Core Village
	SS1024	Land north of the A1071	300	Sproughton	Ipswich Policy Area
	SS1148	Land east of The Tye	5	Lindsey	Hamlet/Countryside
Reasonable alternative	SS0194	Land north of Folly Road	50	Great Waldingfield	Hinterland Village
	SS0220	Land south of Davidson Close	120	Great Cornard	Urban Area/Market Town
	SS0226	Land south-east of George Lane	50	Glemsford	Core Village
	SS0232	Land south of Whatfield Road	20	Elmsett	Hinterland Village
	SS0233	Land north-east of Ipswich Road	15	Elmsett	Hinterland Village
	SS0292	Land west of Sand Hill	60	Boxford	Core Village
	SS0418	Land south-east of Benton Street	15	Hadleigh	Urban Area/Market Town
	SS0590	Land east of Waldringfield Road and north of Church Field Road	25	Chilton	Urban Area/Market Town
	SS0874	Land to the south-east of The Street	12	Little Waldingfield	Hamlet/Countryside
	SS0909	Land west of Aldham Mill Hill and east of Gallows Hill	80	Hadleigh	Urban Area/Market Town
	SS0968	Highfield Mill	5	Sudbury	Urban Area/Market Town
	SS1018	Land to the west of A1141	10	Cockfield	Hamlet/Countryside
	SS1110	Land west of Duffs Hill	25	Glemsford	Core Village
	SS1177	Land north of Sproughton Road	1000	Sproughton	Ipswich Policy Area
SS1205	Land west of Rodbridge Hill	30	Long Melford	Core Village	
Mid Suffolk District					
Allocated sites that are committed	SS0012	Land north of Falconer Avenue	56	Old Newton	Hinterland Village
	SS0029 <sup>35</sup>	Land south of Union Road	300	Onehouse	Urban Area/Market Town
	SS0085	Land east of Ashfield Road	106	Elmswell	Core Village
	SS0110	Land east of The Street	8	Wattisfield	Hamlet/Countryside
	SS0266	Land north of Church Road and east of Wyverstone Road	81	Bacton	Core Village
	SS0530	Former Mid Suffolk District Council Offices and Car Park	64	Needham Market	Urban Area/Market Town
	SS0669	Former Needham Market Middle School	41	Needham Market	Urban Area/Market Town
	SS0818	Land south of B1113 Hall Lane, opposite junction with Half Moon Lane	9	Redgrave	Hinterland Village

<sup>35</sup> Site SS0029 was allocated in the Stowmarket Area Action Plan (2013).

Significant negative but uncertain effect (--?)					
Allocated sites	SS0038	Land east of Old Ipswich Road	15	Yaxley	Hinterland Village
	SS0076	Land north of Church Lane	270	Barham	Ipswich Policy Area
	SS0079	Land west of Queen Street	75	Stradbroke	Core Village
	SS0264	Ashes Farm	575	Stowmarket	Urban Area/Market Town
	SS0670	Land north-east of The Street	500	Woolpit	Core Village
	SS0672	Land north of Church Street	12	Eye	Urban Area/Market Town
	SS0698	Land to the south-west of Yaxley Road	5	Mellis	Hinterland Village
	SS0728	Land to the south of Denham Road	30	Hoxne	Hinterland Village
Reasonable alternatives	SS0091	Land between The Street and A143	100	Botesdale & Rickinghall	Core Village
	SS0575	Land east of Queen Street	30	Stradbroke	Core Village
	SS0815	Land south of The Street	5	Hunston	Hamlet/Countryside
	SS1266	Land south of Half Moon Lane	15	Redgrave	Hinterland Village

**6.97** The Heritage Impact Assessment has indicated that a large number of the sites, whether allocated and committed, allocated and not committed or reasonable alternatives, have the potential to have significant negative effects against SA Objective 12 (To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings). For the sites that receive a major negative effect, the significance of their known heritage assets (designated or otherwise) and historic landscape character are considered high and development is therefore likely to have an adverse physical impact on these assets. These sites are also likely to be very sensitive to setting change.

#### Possible mitigation

**6.98** Mitigation of potential significant negative effects may be achievable by site layout and design, choice of materials, etc. This can help to avoid the most sensitive locations, views and vistas. However, on some sites there may be limited opportunity to achieve this.

### SA Objective 13: To conserve and enhance the quality and local distinctiveness of landscapes and townscapes

#### Significant positive effects

**6.99** Under the assessment methodology, none of the sites are expected to have a significant positive effect against SA Objective 13 (To conserve and enhance the quality and local

distinctiveness of landscapes and townscapes). The SA scoring was informed by a separate Landscape Sensitivity Assessment undertaken by LUC.

#### Significant negative effects

Significant negative effect (--)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	SS0179	Land east of Church Road	34	Stutton	Hinterland Village
	SS0812	Land east of the B1064, Long Melford	150	Long Melford	Core Village
Allocated sites	SS0242	Land at Tye Farm	500	Great Cornard	Urban Area/Market Town
	SS0295	Land south-east of Back Lane	226	Copdock and Washbrook	Ipswich Policy Area
	SS0298	Land north-east of Frog Hall Lane	600	Hadleigh	Urban Area/Market Town
	SS0465	Land north of B1068 and east of Sudbury Road	8	Stoke by Nayland	Hinterland Village
Reasonable alternative	SS0194	Land north of Folly Road	50	Great Waldingfield	Hinterland Village
	SS0303	Land east of Frog Hall Lane	300	Hadleigh	Urban Area/Market Town
	SS0874	Land to the south-east of The Street	12	Little Waldingfield	Hamlet/Countryside
	SS0909	Land west of Aldham Mill Hill and east of Gallows Hill	80	Hadleigh	Urban Area/Market Town
	SS1018	Land to the west of A1141	10	Cockfield	Hamlet/Countryside
	SS1177	Land north of Sproughton Road	1,000	Sproughton	Ipswich Policy Area
	SS1238	Land south of The Street	10	Harkstead	Hamlet/Countryside
Mid Suffolk District					
Allocated sites that are committed	SS1022	Chilton Leys	600	Stowmarket	Urban Area/Market Town
	SS1199	Land west of Stowmarket Road	66	Needham Market	Urban Area/Market Town

Significant negative effect (--)					
Allocated sites	SS0076	Land north of Church Lane	270	Barham	Ipswich Policy Area
	SS0551	Land east of Norwich Road	325	Barham	Ipswich Policy Area
	SS0670	Land north-east of The Street	500	Woolpit	Core Village
	SS1071	Land south of Stowmarket Road	300	Stowupland	Urban Area/Market Town
	SS1202	Land south of Eye Airfield	174	Eye	Urban Area/Market Town
Reasonable alternatives	SS0091	Land between The Street and A143	100	Botesdale & Rickinghall	Core Village
	SS0642	Land to the north of Low Road	250	Debenham	Core Village
	SS1153	Land south-west of Stowmarket Road	134	Needham Market	Urban Area/Market Town

**6.100** Only a small number of sites are expected to have a significant negative effect against SA Objective 13 (To conserve and enhance the quality and local distinctiveness of landscapes and townscapes), although these do contain allocated and committed sites, and allocated sites that do not have planning consent, particularly in Mid Suffolk. It is noticeable that, in most instances, these tend to be larger scale sites of 100 dwellings or more, although a small number of smaller sites are also included.

**6.101** Sites are expected to have a significant negative effect against this objective because they have high sensitivity in that development would be very likely to give rise to significant adverse landscape and/or visual effects.

#### Possible mitigation

**6.102** Mitigation may be possible through the design and layout of development and the choice of materials. In some instances, it may not be possible to mitigate against the significant negative effects in full due to the inherent landscape sensitivity of the site.

## SA Objective 14: To achieve sustainable levels of prosperity and economic growth throughout the plan area

### Significant positive effects

**6.103** Under the assessment methodology, it is not possible for any residential site to score a significant positive effect against SA Objective 14 (To achieve sustainable levels of prosperity and economic growth throughout the plan area). It is recognised that there could indirect positive effects from new during the construction phase, including the supply of

labour and materials, and also from new residents who could be members of the workforce in the local economy, plus support for local shops, services and facilities. However, these are difficult to judge on a site by site basis in order to draw out comparisons between sites.

### Significant negative effects

Significant negative effect (-)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	SS0298	Land north-east of Frog Hall Lane	600	Hadleigh	Urban Area/Market Town
	SS0537	Former Babergh District Council Offices	50	Hadleigh	Urban Area/Market Town
Reasonable alternative	SS0590	Land east of Waldringfield Road and north of Church Field Road	25	Chilton	Urban Area/Market Town
	SS1185	Land to the south of Poplar Lane	150	Sproughton	Ipswich Policy Area
	SS1283	Land to the north of St Bartholomew's Chapel	350	Long Melford	Urban Area/Market Town
Mid Suffolk District					
Allocated sites that are committed	SS0530	Former Mid Suffolk District Council Offices and Car Park	64	Needham Market	Urban Area/Market Town
	SS0636	Land between Bramford Road and the A14	14	Bramford	Ipswich Policy Area
	SS1293	Land south of Great Bricett Business Park	51	Great Bricett	Hamlet/Countryside
Allocated sites	SS1118	Land north of Magdalen Street	80	Eye	Urban Area/Market Town

Significant negative effect (-)					
Reasonable alternatives	N/A	N/A	N/A	N/A	N/A

**6.104** Very few sites received significant negative effects against SA Objective 14 (To achieve sustainable levels of prosperity and economic growth throughout the plan area). Only three allocated sites in total that had not already received planning consent are included. Likewise, there were only three reasonable alternative sites. All these sites have at least 50% of their area currently in employment use.

**Possible mitigation**

**6.105** Not all employment sites are in the most appropriate location for their use, and some may be struggling or have ceased operating. Where this is not the case, employment uses could be incorporated into the site development, or employment land allocated elsewhere.

**SA Objective 15: To revitalise the Districts' town centres**

**Significant positive effects**

Significant positive effect (++)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	SS0502	Angel Court, Angel Street	21	Hadleigh	Urban Area/Market Town
Allocated sites	SS0537	Former Babergh District Council Offices	50	Hadleigh	Urban Area/Market Town
Reasonable alternative	N/A	N/A	N/A	N/A	N/A
Mid Suffolk District					
Allocated sites that are committed	SS0530	Former Mid Suffolk District Council Offices and Car Park	64	Needham Market	Urban Area/Market Town
	SS0669	Former Needham Market Middle School	41	Needham Market	Urban Area/Market Town
	SS1005	Former Mid Suffolk District Council Offices and Car Park	30	Needham Market	Urban Area/Market Town
	SS1288	Land east and west of Prentice Road	60	Stowmarket	Urban Area/Market Town
Allocated sites	SS0031	Land north of Ipswich Road	140	Debenham	Core Village
	SS0101	Former Stowmarket Middle School	40	Stowmarket	Urban Area/Market Town
	SS0268	Land east of Aspell Road	87	Debenham	Core Village
	SS0672	Land north of Church Street	12	Eye	Urban Area/Market Town
	SS0902	Land south of Low Road	18	Debenham	Core Village
	SS1118	Land north of Magdalen Street	80	Eye	Urban Area/Market Town
Reasonable alternatives	SS0267	Land north of Gracechurch Street	150	Debenham	Core Village

**6.106** The assessment criteria for this SA Objective is tightly confined to walking distances. As a result, only a small

number of sites are expected to have a significant positive effect in the significance scoring against SA Objective 15 (To

revitalise the Districts' town centres). In Babergh District, only two sites score a significant positive effect against this objective because they are located within desirable walking distance of Hadleigh Town Centre. In Mid Suffolk District,

eleven sites score a significant positive effect against this objective due to being within desirable walking distance of a town or district centre. Most of these sites are allocated but not yet committed.

### Significant negative effects

Significant negative effect (--)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	SS0177	Land south of Tamage Road	100	Acton	Core Village
	SS0179	Land east of Church Road	34	Stutton	Hinterland Village
	SS0181	Land north-west of Moores Lane	144	East Bergholt	Core Village
	SS0182	Land south of Heath Road	75	East Bergholt	Core Village
	SS0200	Land east of Valley Road	32	Great Waldingfield	Hinterland Village
	SS0212	Land west of Hadleigh Road	41	Elmsett	Hinterland Village
	SS0251	Land east of Longfield Road	100	Capel St Mary	Core Village
	SS0259	Land west of Hadleigh Road	7	Aldham	Hamlet/Countryside
	SS0299	Land at Poplar Lane	475	Sproughton	Ipswich Policy Area
	SS0392	Land west of A137, The Heath	5	Tattingstone	Hamlet/Countryside
	SS0433	Land west of Bures Road	46	Great Cornard	Urban Area/Market Town
	SS0517	Land south-east of Duke Street	6	Hintlesham	Hinterland Village
	SS0591	6 Acre Field	14	Belstead	Ipswich Policy Area
	SS0628	Land to north of Ipswich Road	9	Nedging-with-Naughton	Hinterland Village
	SS0683	Land to the south-west of Harrow Green	5	Lawshall	Hinterland Village
	SS0696	Land north of Holbrook Road	6	Stutton	Hinterland Village
	SS0717	Land east of Ipswich Road	7	Holbrook	Core Village
	SS0812	Land east of the B1064	150	Long Melford	Core Village
	SS0872	Land east of Richardson Lane	24	Chelmondiston	Hinterland Village
	SS0880	Land east of The Street	24	Raydon	Hinterland Village
SS1020	Land west of Bourne Hill	75	Wherstead	Ipswich Policy Area	
SS1121	Land north-west of Waldingfield Road	130	Chilton	Urban Area/Market Town	
SS1125	Land north of Manningtree Road	14	Stutton	Hinterland Village	
SS1197	Land west of Hadleigh Road	10	East Bergholt	Core Village	

Significant negative effect (--)					
	SS1289	Land north of MacKenzie Place	51	Cockfield	Hamlet/Countryside
	SS1290	Land east of Bury Road	10	Cockfield	Hamlet/Countryside
Allocated sites	SS0185	Land south of Ipswich Road	125	Brantham	Core Village
	SS0191	Land north of the A1071	475	Sproughton	Ipswich Policy Area
	SS0203	Land south of Main Road	5	Woolverstone	Hamlet/Countryside
	SS0204	Land south of B1456	15	Chelmondiston	Hinterland Village
	SS0208	Land south of The Street	50	Shotley	Core Village
	SS0222	Land west of The Causeway	12	Hitcham	Hinterland Village
	SS0223	Land north of Burstall Lane and West of B1113	105	Sproughton	Ipswich Policy Area
	SS0242	Land at Tye Farm	500	Great Cornard	Urban Area/Market Town
	SS0255	Land north of Glebe Lane and west of Main Road	5	Woolverstone	Hamlet/Countryside
	SS0258	Land north of The Street	5	Aldham	Hamlet/Countryside
	SS0278	Land south of Wattisham Road	75	Bildeston	Core Village
	SS0288	Land north-west of Melford Road	20	Lavenham	Core Village
	SS0295	Land south-east of Back Lane	226	Copdock and Washbrook	Ipswich Policy Area
	SS0403	Land south of Hadleigh Road, Calais Street	5	Boxford	Hamlet/Countryside
	SS0465	Land north of B1068 and east of Sudbury Road	8	Stoke by Nayland	Hinterland Village
	SS0507	Council Depot	6	Wenham Magna	Hamlet/Countryside
	SS0512	Land east of Upper Street	8	Stanstead	Hamlet/Countryside
	SS0584	Land north of Red Hill Road/ Malyon Road	75	Hadleigh	Urban Area/Market Town
	SS0587	Land south of High Road	40	Leavenheath	Hamlet/Countryside
	SS0593	Land south-west of London Road	12	Copdock and Washbrook	Ipswich Policy Area
	SS0637	Land south-west of Rembrow Road	30	Capel St Mary	Core Village
	SS0682	Land east of Bury Road	15	Lawshall	Hinterland Village
	SS0709	Land to the south-east of Butt Road	8	Stoke by Nayland	Hinterland Village
SS0711	Land east of Loraine Way	50	Sproughton	Ipswich Policy Area	
SS0752	Land Adjacent to the B1070	12	Holton St Mary	Hamlet/Countryside	
SS0754	Claypits Avenue (Garages)	5	Bures St Mary	Core Village	
SS0820	Land west of Church Lane	20	Bentley	Hinterland Village	
SS0877	Land north of Woodlands Road	10	Raydon	Hinterland Village	

Significant negative effect (--)					
	SS0910	Land south-west of Rembrow Road	520	Capel St Mary	Core Village
	SS0954	Land to the west of Hadleigh Road	25	Sproughton	Ipswich Policy Area
	SS1024	Land north of the A1071	300	Sproughton	Ipswich Policy Area
	SS1068	Land south of Waldingfield Road	20	Chilton	Hinterland Village
	SS1148	Land east of The Tye	5	Lindsey	Hamlet/Countryside
	SS1155	Land north of Goldenlond	10	Stoke By Nayland	Hinterland Village
Reasonable alternative	SS0194	Land north of Folly Road	50	Great Waldingfield	Hinterland Village
	SS0211	Land west of Brantham Hill	50	Brantham	Core Village
	SS0220	Land south of Davidson Close	120	Great Cornard	Urban Area/Market Town
	SS0226	Land south-east of George Lane	50	Glemsford	Core Village
	SS0232	Land south of Whatfield Road	20	Elmsett	Hinterland Village
	SS0233	Land north-east of Ipswich Road	15	Elmsett	Hinterland Village
	SS0237	Land west of Bury Road	10	Lawshall	Hinterland Village
	SS0286	Land south of Kings Road	100	Glemsford	Core Village
	SS0292	Land west of Sand Hill	60	Boxford	Core Village
	SS0303	Land east of Frog Hall Lane	300	Hadleigh	Urban Area/Market Town
	SS0395	Land south of Station Road and west of Bergholt Road	60	Bentley	Hinterland Village
	SS0503	Land north-east of Valley View	5	Stanstead	Hamlet/Countryside
	SS0590	Land east of Waldringfield Road and north of Church Field Road	25	Chilton	Urban Area/Market Town
	SS0620	Land west of London Road	25	Copdock and Washbrook	Ipswich Policy Area
	SS0644	Land south of Hadleigh Road	8	Elmsett	Hinterland Village
	SS0685	Land west of Melford Road	5	Lawshall	Hinterland Village
	SS0690	Land south of Lambs Lane	10	Lawshall	Hinterland Village
	SS0750	Second Avenue (Garages)	5	Sudbury	Urban Area/Market Town
	SS0867	Land to the north-east of Pond Hall Lane	30	Hadleigh	Urban Area/Market Town
	SS0874	Land to the south-east of The Street	12	Little Waldingfield	Hamlet/Countryside
SS0968	Highfield Mill	5	Sudbury	Urban Area/Market Town	
SS1018	Land to the west of A1141	10	Cockfield	Hamlet/Countryside	
SS1019	Land west of Ballingdon Hill and south of Sandy Lane	60	Sudbury	Urban Area/Market Town	
SS1044	Land east of Bergholt Road	20	Bentley	Hinterland Village	

Significant negative effect (--)					
	SS1060	Land west of Noaks Road	6	Raydon	Hinterland Village
	SS1110	Land west of Duffs Hill	25	Glemsford	Core Village
	SS1177	Land north of Sproughton Road	1000	Sproughton	Ipswich Policy Area
	SS1185	Land to the south of Poplar Lane	150	Sproughton	Ipswich Policy Area
	SS1205	Land west of Rodbridge Hill	30	Long Melford	Core Village
	SS1238	Land south of The Street	10	Harkstead	Hamlet/Countryside
	SS1257	Land south of Hadleigh Road	5	Boxford	Core Village
	SS1283	Land to the north of St Bartholomew's Chapel	350	Long Melford	Urban Area/Market Town
Mid Suffolk District					
Allocated sites that are committed	SS0004	Land south of Bacton Road	98	Haughley	Core Village
	SS0006	Land west of Barton Road	129	Thurston	Core Village
	SS0008	Land south of Barrells Road	6	Thurston	Core Village
	SS0009	Land between Jack's Green Road and A14	43	Creeting St Mary	Urban Area/Market Town
	SS0012	Land north of Falconer Avenue	56	Old Newton	Hinterland Village
	SS0019	Land west of Meadow Lane	64	Thurston	Core Village
	SS0020	Land south of The Broadway	13	Badwell Ash	Hinterland Village
	SS0029 <sup>36</sup>	Land south of Union Road	300	Onehouse	Urban Area/Market Town
	SS0033	Land west of Old Norwich Road	190	Whitton	Ipswich Policy Area
	SS0037	Land west of The Street	21	Badwell Ash	Hinterland Village
	SS0040	Land west of Wattisfield Road	60	Walsham-le-Willows	Core Village
	SS0047	Land west of Fishponds Way	65	Haughley	Core Village
	SS0058	Land between Oatfields and Stradbroke Road	18	Fressingfield	Hinterland Village
	SS0069	Land south of Framlingham Road	49	Laxfield	Hinterland Village
	SS0073	Land north of B1115,	143	Stowupland	Urban Area/Market Town
	SS0078	Land south-east of Hunston Road	52	Badwell Ash	Hinterland Village
	SS0085	Land east of Ashfield Road	106	Elmswell	Core Village
	SS0088	Former Bacton Middle School	50	Bacton	Core Village
SS0093	Land east of Green Road	49	Woolpit	Core Village	
SS0096	Land south of Church Road	38	Elmswell	Core Village	

<sup>36</sup> Site SS0029 was allocated in the Stowmarket Area Action Plan (2013).

Significant negative effect (--)					
SS0099	Land north-east of Turkey Hall Lane	51	Bacton		Core Village
SS0110	Land east of The Street	8	Wattisfield		Hamlet/Countryside
SS0129	Land south of Back Hills	40	Botesdale & Rickinghall		Core Village
SS0131	Land south of Stowmarket Road	64	Old Newton		Hinterland Village
SS0151	Land south of Church Road	18	Stowupland		Core Village
SS0266	Land north of Church Road and east of Wyverstone Road	81	Bacton		Core Village
SS0270	Land north of Station Road	29	Haughley		Core Village
SS0358	Land north of Top Road	8	Rattlesden		Hamlet/Countryside
SS0369	Land east of Wattisfield Road	22	Walsham-le-Willows		Core Village
SS0453	Land north of Stoke Road and west of Clint Road,	20	Thorndon		Hinterland Village
SS0478	Land east of The Street	190	Bramford		Ipswich Policy Area
SS0500	Land east of Mitchery Lane	22	Rattlesden		Hamlet/Countryside
SS0518	Land south of Pretyman Avenue	85	Bacton		Core Village
SS0547	Land south of Old Stowmarket Road	120	Woolpit		Core Village
SS0550	Land east of Withersdale Road, opposite Mendham Primary School	6	Mendham		Hinterland Village
SS0612	Land east of Bowl Road and north-west of Cobbold Close	9	Battisford		Hamlet/Countryside
SS0616	Land east of Mill Road	13	Laxfield		Hinterland Village
SS0636	Land between Bramford Road and the A14	14	Bramford		Ipswich Policy Area
SS0716	Land west of Ixworth Road	250	Thurston		Core Village
SS0736	Land north of Tostock Road	9	Beyton		Hinterland Village
SS0765	Land to the West of Church Road	15	Thurston		Core Village
SS0818	Land south of B1113 Hall Lane, opposite junction with Half Moon Lane	9	Redgrave		Hinterland Village
SS0860	Land to the east of Pear Tree Place	21	Great Finborough		Hinterland Village
SS0949	Land north of Mill Road	69	Botesdale & Rickinghall		Core Village
SS1022	Chilton Leys	600	Stowmarket		Urban Area/Market Town
SS1043	Land south of New Street	60	Stradbroke		Core Village
SS1056	Land north of Pesthouse Lane	20	Barham		Ipswich Policy Area
SS1088	Land north of Ashfield Road	8	Norton		Hamlet/Countryside
SS1190	Land north of Gardenhouse Lane	42	Botesdale & Rickinghall		Core Village

Significant negative effect (--)					
	SS1292	Land north of The Broadway	33	Badwell Ash	Hinterland Village
	SS1293	Land south of Great Bricett Business Park	51	Great Bricett	Hamlet/Countryside
	SS1294	Land south of Shop Street	26	Worlingworth	Hamlet/Countryside
Allocated sites	SS0038	Land east of Old Ipswich Road	15	Yaxley	Hinterland Village
	SS0039	Land north of Church Road	60	Elmswell	Core Village
	SS0042	Land west of Old Ipswich Road	20	Yaxley	Hinterland Village
	SS0054	Land north-east of The Street	15	Weybread	Hamlet/Countryside
	SS0065	Land south of Glebe Way	75	Mendlesham	Core Village
	SS0075	Land east of Ixworth Road	200	Thurston	Core Village
	SS0076	Land north of Church Lane	270	Barham	Ipswich Policy Area
	SS0079	Land west of Queen Street	75	Stradbroke	Core Village
	SS0084	Land north of The Street	10	Westhorpe	Hamlet/Countryside
	SS0090	Land east of Church Road and south of Old Post Office Lane	25	Thurston	Core Village
	SS0107	Land north-west of School Road	50	Elmswell	Core Village
	SS0121	Land south of Fitzgerald Road	100	Bramford	Ipswich Policy Area
	SS0127	Land west of Jacks Green Road	5	Creeting St Mary	Urban Area/Market Town
	SS0132	Land west of Station Road	100	Elmswell	Core Village
	SS0141	Land south of The Street	35	Stonham Aspal	Hinterland Village
	SS0145	Land west of Main Road	30	Somersham	Hinterland Village
	SS0157 <sup>37</sup>	Land south of Union Road	100	Onehouse	Urban Area/Market Town
	SS0163	Land east of Norwich Road	5	Stonham Parva	Hinterland Village
	SS0319	Land south of Heath Road	110	Thurston	Core Village
	SS0343	Land south of Forest Road	10	Onehouse	Urban Area/Market Town
	SS0380	Land south of Wickham Road	10	Finningham	Hinterland Village
	SS0513	Land between New Road and Leys Road	5	Tostock	Hinterland Village
SS0542	Land south of the B1118	5	Brome & Oakley	Hinterland Village	
SS0551	Land east of Norwich Road	325	Barham	Ipswich Policy Area	
SS0558	Land to the south of Long Thurlow Road	10	Badwell Ash	Hamlet/Countryside	
SS0570	Land east of A140 The Street	10	Wetheringsett	Hamlet/Countryside	

<sup>37</sup> Site SS0157 was allocated in the Stowmarket Area Action Plan (2013).

Significant negative effect (--)					
SS0573	Land south of Church Road	5	Worlingworth	Hamlet/Countryside	
SS0599	Land to the north-east of the junction between The Street and Cedars Hill	10	Wetheringsett	Hamlet/Countryside	
SS0603	Land north of Barking Road and west of Hascot Hill	10	Barking	Hinterland Village	
SS0654	Land south of Chalk Hill Lane and West of Hood Drive	8	Great Blakenham	Ipswich Policy Area	
SS0670	Land north-east of The Street	500	Woolpit	Core Village	
SS0678	Land south of Hubbard's Lane and east of The Green	5	Hessett	Hinterland Village	
SS0681	Land east of Farriers Close	35	Stradbroke	Core Village	
SS0698	Land to the south-west of Yaxley Road	5	Mellis	Hinterland Village	
SS0706	Land to the west of Debenham Way	10	Pettaugh	Hamlet/Countryside	
SS0723	Land to the west of The Street	8	Stoke Ash	Hamlet/Countryside	
SS0728	Land to the south of Denham Road	30	Hoxne	Hinterland Village	
SS0729	Land south of Beyton Road	200	Thurston	Core Village	
SS0783	Land west of Heath Road	30	Woolpit	Core Village	
SS0786	Land to the south of Wickham Road and west of A140	10	Thwaite	Hinterland Village	
SS0796	Land to the west of B1077	15	Ashbocking	Hamlet/Countryside	
SS0810	Land west of Norwich Road	5	Stonham Parva	Hinterland Village	
SS0814	Land north of Long Thurlow Road	5	Badwell Ash	Hamlet/Countryside	
SS0832	Land west of Main Road	45	Henley	Hinterland Village	
SS0849	Land west Gislingham Road	10	Finningham	Hinterland Village	
SS0861	Land south of Church Lane	75	Claydon	Ipswich Policy Area	
SS0863	Land north of B1123	25	Metfield	Hinterland Village	
SS0869	Land west of Bildeston Road	5	Combs	Hinterland Village	
SS1011	Land north of B1118	10	Brome & Oakley	Hinterland Village	
SS1021	Land south of Church Road	10	Old Newton	Hinterland Village	
SS1058	Land north east of Haggars Mead	20	Stonham Earl	Hinterland Village	
SS1065	Land west of Church Road	10	Beyton	Hinterland Village	
SS1071	Land south of Stowmarket Road	300	Stowupland	Urban Area/Market Town	
SS1166	Land west of Grange Road	5	Wickham Skeith	Hamlet/Countryside	
SS1188	Land north of Mendlesham Road	5	Cotton	Hamlet/Countryside	

Significant negative effect (--)					
	SS1198	Land north of Laxfield Road	45	Stradbroke	Core Village
	SS1202	Land south of Eye Airfield	174	Eye	Urban Area/Market Town
	SS1228	Land west of Church Lane	5	Thwaite	Hinterland Village
Reasonable alternatives	SS0080	Land east of Queen Street	10	Stradbroke	Stradbroke
	SS0083	Land east of Queen Street	10	Stradbroke	Core Village
	SS0087	Land north-east of Chapel Road	50	Mendlesham	Core Village
	SS0091	Land between The Street and A143	100	Botesdale & Rickinghall	Core Village
	SS0105	Land south of Ash Plough and west of Queen Street	20	Stradbroke	Core Village
	SS0119	Land between Ixworth Road and Hawes Lane	12	Norton	Hinterland Village
	SS0171	Land west of Old Ipswich Road	21	Claydon	Ipswich Policy Area
	SS0575	Land south of Ashbocking Road	20	Henley	Hinterland Village
	SS0673	Land east of Queen Street	30	Stradbroke	Core Village
	SS0735	Land north-east of Heath Road	10	Woolpit	Core Village
	SS0806	Land south of Church Road	10	Westhorpe	Hamlet/Countryside
	SS0809	Land north-east of Mill Hill	15	Cotton	Hamlet/Countryside
	SS0815	Land south of The Street	5	Hunston	Hamlet/Countryside
	SS0825	Land north of Long Thurlow Road	10	Badwell Ash	Hamlet/Countryside
	SS0859	Land west of B1118	5	Wilby	Hamlet/Countryside
	SS0864	Land south of Church Road	50	Bacton	Core Village
	SS0952	Land north of Gipping Road	20	Great Blakenham	Ipswich Policy Area
	SS1055	Land south of Gipping Road	10	Great Blakenham	Ipswich Policy Area
	SS1106	Land west of High Road	25	Great Finborough	Hinterland Village
	SS1187	Land south of Gipping Road	100	Stowupland	Core Village
SS1189	Land east of Stonham Road	10 <sup>38</sup>	Cotton	Hamlet/Countryside	
SS1239	Land east of Eye Road and north of Church Close	10 <sup>39</sup>	Kenton	Hamlet/Countryside	
SS1248	Land east of Old Ipswich Road	250	Claydon	Ipswich Policy Area	
SS1266	Land south of Mill Road	25	Botesdale	Core Village	
SS1268	Land south of Half Moon Lane	15	Redgrave	Hinterland Village	

<sup>38</sup> Based on an assumed density basis.

<sup>39</sup> Based on an assumed density basis.

Significant negative effect (-)					
	SS1278	Land east of School Lane	8	Coddenham	Hinterland Village
	SS1279	Land to the south of Willow Farm	5	Wilby	Hamlet/Countryside

**6.107** The tightly drawn assessment criteria for this SA Objective has resulted in a large number of sites, whether allocated and committed, allocated but not yet committed, or reasonable alternatives receiving significant negative effects against SA Objective 15 (To revitalise the Districts' town centres). This is due to the fact these sites are not located within desirable walking distance of a town or district centre and are therefore unlikely to help increase footfall in town and district centres.

**6.108** It can be seen that by far the majority of these sites are in the Hinterland Villages and Hamlets/Countryside. A sizeable number are in the Core Villages, with some in the Ipswich Policy Area, and a small number in the Market Towns/Urban Areas themselves. For the latter, these are likely to sites towards the outer limits or on the fringes of the built-up areas.

#### Possible mitigation

**6.109** Although the site appraisal criteria have been tightly prescribed for this SA Objective, it is likely that development within or close to the Districts' centres is likely to provide some support for them, and even development further afield could see people travelling to the Districts' centres to meet some of their needs. The main issue is that, the further away that people are from the Districts' centres, the greater the likelihood they will travel by car, and the greater the risk that they could look elsewhere to access services and facilities provided by the Districts' town centres, including outside the Districts, such as Ipswich and Bury St Edmunds.

**6.110** There is not a great deal that can be done to mitigate these effects on an individual residential site basis, except by providing good public transport services to the Districts' centres. Complementary measures would also help, such as ensuring that the Districts' centres have an attractive offer enabling them to compete with other centres, but residential development outside the Districts' centres are unlikely to be able to contribute to this.

**SA Objective 16: To enable efficient patterns of movement and modal shift towards sustainable modes of transport**

**Significant positive effects**

Significant positive effect (++)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	SS1082	Land east of Kings Hill	8	Great Cornard	Urban Area/Market Town
Allocated sites	N/A	N/A	N/A	N/A	N/A
Reasonable alternative	SS0509	Land north of Newton Road	12	Sudbury	Urban Area/Market Town
	SS0745	Elm Road/Chilton Lodge Road	5	Sudbury	Urban Area/Market Town
Mid Suffolk District					
Allocated sites that are committed	SS0019	Land west of Meadow Lane	64	Thurston	Core Village
	SS0530	Former Mid Suffolk District Council Offices and Car Park	64	Needham Market	Urban Area/Market Town
	SS0669	Former Needham Market Middle School	41	Needham Market	Urban Area/Market Town
	SS0765	Land to the West of Church Road	15	Thurston	Core Village
	SS1005	Former Mid Suffolk District Council Offices and Car Park	30	Needham Market	Urban Area/Market Town
	SS1288	Land east and west of Prentice Road	60	Stowmarket	Urban Area/Market Town
Allocated sites	SS0039	Land north of Church Road	60	Elmswell	Core Village
	SS0101	Former Stowmarket Middle School	40	Stowmarket	Urban Area/Market Town
	SS0107	Land north-west of School Road	50	Elmswell	Core Village
	SS0132	Land west of Station Road	100	Elmswell	Core Village
	SS0264	Ashes Farm	575	Stowmarket	Urban Area/Market Town
	SS0319	Land south of Heath Road	110	Thurston	Core Village
	SS0668	Land south of Creting Road West	25	Stowmarket	Urban Area/Market Town
	SS0729	Land south of Beyton Road	200	Thurston	Core Village

Significant positive effect (++)					
Reasonable alternatives	N/A	N/A	N/A	N/A	N/A

**6.111** In Babergh District, only a small number of sites are expected to have a significant positive effect in relation to the significance scoring against SA Objective 16 (To enable efficient patterns of movement and modal shift towards sustainable modes of transport). These sites score a significant positive effect because they are all located within desirable walking distance of a bus stop and a cycle path. One of the sites (SS0745: Elm Road/Chilton Lodge Road, Sudbury) is also located within desirable walking distance of a railway station. In Mid Suffolk District, all sites that receive a significant positive effect against this objective are located

within desirable walking distance of at least one bus stop. Over half of sites are also located within desirable walking distance of a railway station and/or cycle path.

**6.112** It is interesting to note that, in Mid Suffolk, sites at the Core Villages Elmswell and Thurston perform well. This is because they have a railway station and given the smaller size of these settlements compared to the Market Towns/Urban Areas, there is a greater opportunity to develop within desirable walking distance of the stations.

#### Significant negative effects

Significant negative effect (--)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	SS0512	Land east of Upper Street	8	Stanstead	Hamlet/Countryside
Reasonable alternative	N/A	N/A	N/A	N/A	N/A
Mid Suffolk District					
Allocated sites that are committed	SS0369	Land east of Wattisfield Road	22	Walsham-le-Willows	Core Village

Significant negative effect (--)					
Allocated sites	N/A	N/A	N/A	N/A	N/A
Reasonable alternatives	N/A	N/A	N/A	N/A	N/A

**6.113** A smaller number of sites in both Districts receive a significant negative effect against SA Objective 16 (To enable efficient patterns of movement and modal shift towards sustainable modes of transport). Both Districts contain one site that scores a significant negative effect against this objective because they are located beyond the preferred maximum walking distance to a railway station and cycle path and are located within the preferred maximum walking distance of a bus stop.

**6.114** Given the rural nature of much of the Plan area, it is perhaps surprising that more sites did not receive significant negative effects for this SA Objective. This may be because many of the settlements do have bus services. However, because of a lack of easily accessible and up-to-date information, the quality of the bus services has not been taken into account. It does show, though, that services do exist and, if necessary, could be increased if demand through additional development warranted this. However, the current trend is for bus services to decrease rather than increase, especially in rural areas.

#### Possible mitigation

**6.115** New or improved bus services and cycleways can form part of development proposals although, in practice, this is most likely to happen with larger sites, particularly for bus services. It is highly unlikely that new railway stations will be developed, except where associated with much larger scale development.

#### Summary and conclusions for residential sites

**6.116** Summary tables of the SA scores for all the residential sites considered for inclusion in the JLP are shown in **Table 6.3**. They are presented by parish for each District to enable easy comparison of the performance of the sites at a local level.

- Site names that are in ***bold italics*** are those sites that are already committed and therefore automatically are

allocated in the JLP. As of October 2020, these sites all had planning permission.

- Sites names that are **bold**, without italics, are those sites that do not yet have planning consent but are allocated in the JLP.
- Site names that are in normal text (i.e. are neither bold nor in italics) are sites that BMSDC have decided not to include in the JLP as allocations.

**6.117** Given the number of sites, it can be difficult to identify patterns or trends regarding how different sites perform. Our analysis suggests that, when looking across all the SA Objectives, if each SA Objective is given equal weight:

- Sites in the Market Towns perform best, particularly in Mid Suffolk.
- Sites in the Hinterland Villages and Hamlets and Countryside perform least well across both Districts.
- Sites in the Ipswich Fringe and Core Villages perform similarly. In Mid Suffolk, sites in the Core Villages perform slightly better than the Ipswich Fringe sites, whereas in Babergh, the Ipswich Fringe sites perform slightly better than those in the Core Villages.
- Larger sites, which are generally in the Ipswich Policy Area, Market Towns and Urban Areas, and to a lesser extent the Core Villages tend to perform better than smaller sites, which tend to be in the Hinterland Villages and Hamlets and Countryside.

**6.118** This supports the findings of the SA of the Spatial Strategy Options, which concluded that the Market Towns and Urban Areas are the most sustainable locations to deliver development, followed by the Ipswich Fringe and Core Villages (particularly in the Sustainable Transport Corridors).

**6.119** However, when it comes to comparisons at the parish level, between sites that have been allocated, and sites that have not, no clear cut patterns emerge. In some instances, the sites that are allocated perform more strongly against the SA Objectives when each SA Objective is given equal weight. In

other instances, the sites that are not allocated appear to perform more strongly against the SA Objectives than the sites that have been allocated.

**6.120** Similarly, when looking across all sites, there is not a lot of difference between sites that have already been committed and those that are allocated that have yet to receive planning consent. It is not possible to say that, collectively, one category of site (i.e. committed and allocated, allocated but not committed, or reasonable alternative) clearly performs better than the others, across all of the JLP settlement hierarchy categories.

**6.121** Therefore, in terms of overall performance, the most important factor appears to be which of the JLP settlement hierarchy categories a site falls into when measured against the SA Objectives. There are differences between sites at the settlement level, but these need to be considered on a site-by-site basis.

**6.122** In terms of decision-making, the outcomes of the SA will have been one factor taken into account. Other factors, including other evidence bases, and responses to the public consultation will also have had an influence. In certain instances, a single issue, such as impact on the historic environment, may have been considered to outweigh other factors.

**6.123** The reasons for the decisions made are summarised in **Appendix G (Reasons for Selecting or Rejecting Site Options)** of this SA Report.

Table 6.3: Policy-off significance scores summary table (residential sites)

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
Babergh District																			
Acton Parish																			
SS0177	Land south of Tamage Road	Core Village	100	+	0	+	+	--	--	--	N/A	-	0	--?	--?	-	0	--	-
Aldham Parish																			
SS0258	Land north of The Street	Hamlet/Countryside	5	+	--	--	++	-	--	-	N/A	--	0	--?	--?	0	0	--	-
SS0259	Land west of Hadleigh Road	Hamlet/Countryside	7	+	--	--	++	-	--	-	N/A	--	0	--?	--?	-	0	--	-
Belstead Parish																			
SS0591	6 Acre Field	Ipswich Policy Area	14	+	--	+	++	--	--	--	N/A	-	0	--?	--?	-	0	--	+
Bentley Parish																			
SS0395	Land south of Station Road and west of Bergholt Road	Hinterland Village	60	+	--	-	++	--	--	--	N/A	--	--	--?	--?	-	0	--	-
SS0820	Land west of Church Lane	Hinterland Village	20	+	0	-	++	--	--	--	N/A	-	0	--?	--?	-	0	--	-
SS1044	Land east of Bergholt Road	Hinterland Village	20	+	--	-	++	--	--	--	N/A	--	0	--?	0?	-	0	--	-
Bildeston Parish																			
SS0278	Land south of Wattisham Road	Core Village	75	++	-	-	++	--	-	-	N/A	-	0	--?	--?	-	0	--	-

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
Boxford Parish																			
SS0292	Land west of Sand Hill	Core Village	60	++	0	-	++	--	--	-	N/A	+	--	-?	--?	-	0	--	-
SS0403	Land south of Hadleigh Road, Calais Street	Hamlet/Countryside	5	+	--	--	++	-	--	--	N/A	--	0	-?	-?	-	0	--	-
SS1257	Land south of Hadleigh Road	Core Village	5	+	--	-	++	-	--	++	N/A	--	0	--?	0?	0	0	--	-
Brantham Parish																			
SS0185	Land south of Ipswich Road	Core Village	125	+	-	-	++	--	--	-	N/A	-	0	--?	--?	-	0	--	-
SS0211	Land west of Brantham Hill	Core Village	50	+	0	-	++	--	--	-	N/A	-	-	--?	-?	-	0	--	-
Bures St Mary Parish																			
SS0754	Claypits Avenue (Garages)	Core Village	5	++?	0	-	++	-	--	++	N/A	+	0	--?	-?	0	0	--	+
Capel St Mary Parish																			
SS0251	Land east of Longfield Road	Core Village	100	++?	-	-	+	--	--	--	N/A	-	0	--?	-?	-	0	--	-
SS0637	Land south-west of Rembrow Road	Core Village	30	++?	0	-	+	--	--	-	N/A	-	0	--?	-?	-	0	--	-
SS0910	Land south-west of Rembrow Road	Core Village	520	++?	0	-	+	--	--	--	N/A	+	-	--?	--?	-	0	--	-
Chelmondiston Parish																			
SS0204	Land south of B1456	Hinterland Village	15	++?	0	-	+	-	--	--	N/A	-	0	--?	-?	-	0	--	-

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
SS0872	Land east of Richardson Lane	Hinterland Village	24	+	0	-	+	-	--	--	N/A	-	0	--?	-?	-	0	--	-
Chilton Parish																			
SS0590	Land east of Waldringfield Road and north of Church Field Road	Urban Area/Market Town	25	+?	-	++	+	-	--	-	N/A	+	0	--?	--?	-	--	--	+
SS1068	Land south of Waldingfield Road	Hinterland Village	20	-	-	-	+	--	--	-	N/A	--	0	-?	-?	-	0	--	-
SS1121	Land north-west of Waldingfield Road	Urban Area/Market Town	130	+	-	++	+	-	--	-	N/A	+	-	--?	--?	-	0	--	+
Cockfield Parish																			
SS1018	Land to the west of A1141	Hamlet/Countryside	10	+	--	--	++	--	--	--	N/A	--	--	0	--?	--	0	--	-
SS1289	Land north of MacKenzie Place	Hamlet/Countryside	51	+	--	--	++	--	--	-	N/A	--	--	--?	-?	-	0	--	-
SS1290	Land east of Bury Road	Hamlet/Countryside	10	+	--	--	++	--	--	-	N/A	-	0	0	-?	-	0	--	+
Copdock & Washbrook Parish																			
SS0295	Land south-east of Back Lane	Ipswich Policy Area	226	+	0	+	++	--	--	--	N/A	+	0	--?	--?	--	0	--	+
SS0593	Land south-west of London Road	Ipswich Policy Area	12	-	--	0	++	--	--	--	N/A	--	0	--?	-?	0	0	--	-
SS0620	Land west of London Road	Ipswich Policy Area	25	-	--	0	++	--	--	--	N/A	--	0	-?	-?	-	0	--	-
East Bergholt Parish																			
SS0181	Land north-west of Moores Lane	Core Village	144	+	+	-	++	--	--	--	N/A	-	0	--?	-?	-	0	--	-

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
SS0182	Land south of Heath Road	Core Village	75	++	+	-	++	--	--	--	N/A	+	0	--?	-?	-	0	--	-
SS1197	Land west of Hadleigh Road	Core Village	10	-	+	-	+	--	--	-	N/A	-	0	--?	-?	-	0	--	-
Elmsett Parish																			
SS0212	Land west of Hadleigh Road	Hinterland Village	41	++?	-	-	++	--	--	-	N/A	-	0	-?	-?	-	0	--	+
SS0232	Land south of Whatfield Road	Hinterland Village	20	+	-	-	++	--	--	-	N/A	-	--	--?	--?	-	0	--	+
SS0233	Land north-east of Ipswich Road	Hinterland Village	15	++?	0	-	++	--	--	-	N/A	-	0	--?	--?	-	0	--	+
SS0644	Land south of Hadleigh Road	Hinterland Village	8	+	-	-	++	-	--	-	N/A	--	0	-?	-?	-	0	--	-
Glemsford Parish																			
SS0226	Land south-east of George Lane	Core Village	50	++?	--	-	+	--	--	--	N/A	-	-	0	--?	-	0	--	-
SS0286	Land south of Kings Road	Core Village	100	+++?	-	-	+	--	--	--	N/A	-	0	--?	-?	-	0	--	-
SS1110	Land west of Duffs Hill	Core Village	25	+++?	-	-	+	--	--	--	N/A	-	--	--?	--?	-	0	--	-
Great Cornard Parish																			
SS0220	Land south of Davidson Close	Urban Area/Market Town	120	++?	+	+	++	--	--	-	N/A	+	--	--?	--?	-	0	--	+
SS0242	Land at Tye Farm	Urban Area/Market Town	500	++?	++	++	++	--	--	--	N/A	++	0	--?	-?	--	0	--	+

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
SS0433	Land west of Bures Road	Urban Area/Market Town	46	+	++	+	++	--	--	-	N/A	++	0	--?	0?	-	0	--	+
SS1082	Land east of Kings Hill	Urban Area/Market Town	8	+	+	++	+	-	--	-	N/A	++	--	--?	-?	0	0	-	++
Great Waldingfield Parish																			
SS0194	Land north of Folly Road	Hinterland Village	50	+	0	-	++	--	--	-	N/A	-	0	0	--?	--	0	--	-
SS0200	Land east of Valley Road	Hinterland Village	32	+	0	-	+	--	--	-	N/A	-	--	-?	--?	-	0	--	-
Hadleigh Parish																			
SS0298	Land north-east of Frog Hall Lane	Urban Area/Market Town	600	+?	++	++	+	--	--	-	N/A	++	-	--?	-?	--	--	-	-
SS0303	Land east of Frog Hall Lane	Urban Area/Market Town	300	+	++	+	+	--	--	-	N/A	+	--	--?	-?	--	0	--	-
SS0418	Land south-east of Benton Street	Urban Area/Market Town	15	+++?	+	+	+	--	--	-	N/A	+	-	--?	--?	-	0	-	+
SS0502	Angel Court, Angel Street	Urban Area/Market Town	21	++	+	+	+	-	-	++	N/A	++	--	-?	0	0	0	++	+
SS0537	Former Babergh District Council Offices	Urban Area/Market Town	50	++	0	+	+	--	-	++	N/A	+	--	--?	--?	0	--	++	+
SS0584	Land north of Red Hill Road/ Malyon Road	Urban Area/Market Town	75	+?	+	++	+	--	--	-	N/A	+	-	--?	-?	-	0	--	-

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
SS0867	Land to the north-east of Pond Hall Lane	Urban Area/Market Town	30	+	+	+	+	--	--	-	N/A	+	-	--?	0?	-	0	--	-
SS0909	Land west of Aldham Mill Hill and east of Gallows Hill	Urban Area/Market Town	80	++?	+	++	+	--	--	-	N/A	++	--	--?	--?	--	0	+	+
Harkstead Parish																			
SS1238	Land south of The Street	Hamlet/Countryside	10	+	--	--	+	-	--	--	N/A	--	0	--?	0?	--	0	--	-
Hintlesham Parish																			
<b>SS0517</b>	<b>Land south-east of Duke Street</b>	<b>Hinterland Village</b>	<b>6</b>	-	--	-	++	-	--	-	N/A	--	0	0	--?	0	0	--	-
Hitcham Parish																			
SS0222	Land west of The Causeway	Hinterland Village	12	++?	--	-	++	-	-	-	N/A	--	0	--?	--?	-	0	--	-
Holbrook Parish																			
SS0717	Land east of Ipswich Road	Core Village	7	++?	++	-	+	-	--	--	N/A	+	0	--?	--?	0	0	--	-
Holton St Mary Parish																			
SS0752	Land Adjacent to the B1070	Hamlet/Countryside	12	++?	--	--	++	--	--	--	N/A	--	0	--?	--?	-	0	--	-
Lavenham Parish																			
SS0288	Land north-west of Melford Road	Core Village	20	+	--	-	+	--	--	-	N/A	-	0	--?	--?	-	0	--	+
Lawshall Parish																			

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
SS0237	Land west of Bury Road	Hinterland Village	10	-	--	--	++	--	--	-	N/A	--	-	--?	-?	-	0	--	-
<b>SS0682</b>	<b>Land east of Bury Road</b>	<b>Hinterland Village</b>	<b>15</b>	-	--	--	++	-	--	-	N/A	--	0	--?	-?	-	0	--	-
<b>SS0683</b>	<b>Land to the south-west of Harrow Green</b>	<b>Hinterland Village</b>	<b>5</b>	-	-	--	++	-	--	-	N/A	--	0	0	-?	-	0	--	-
SS0685	Land west of Melford Road	Hinterland Village	5	-	--	--	++	-	--	-	N/A	--	0	--?	-?	-	0	--	-
SS0690	Land south of Lambs Lane	Hinterland Village	10	-	--	--	++	-	--	-	N/A	--	0	-?	-?	-	0	--	-
Leavenheath Parish																			
<b>SS0587</b>	<b>Land south of High Road</b>	<b>Hamlet/Countryside</b>	<b>40</b>	+	--	--	++	--	--	--	N/A	--	0	-?	-?	-	0	--	-
Lindsey Parish																			
<b>SS1148</b>	<b>Land east of The Tye</b>	<b>Hamlet/Countryside</b>	<b>5</b>	+	--	--	++	--	--	-	N/A	--	-	--?	--?	-	0	--	-
Little Waldingfield Parish																			
SS0874	Land to the south-east of The Street	Hamlet/Countryside	12	+?	--	-	++	--	--	-	N/A	--	0	0	--?	--	0	--	-
Long Melford Parish																			
<b>SS0812</b>	<b>Land east of the B1064</b>	<b>Core Village</b>	<b>150</b>	++	-	0	+	--	--	--	N/A	+	0	--?	-?	--	0	--	-
SS1205	Land west of Rodbridge Hill	Core Village	30	+	--	0	+	--	--	-	N/A	-	0	--?	--?	-	0	--	-
SS1283	Land to the north of St Bartholomews Chapel Sudbury	Urban Area/Market Town	350	+	++	++	++	--	--	-	N/A	++	0	-?	-?	-	--	--	+

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
Nedging-with-Naughton Parish																			
SS0628	Land to north of Ipswich Road	Hinterland Village	9	+	--	--	++	--	--	-	N/A	--	-	-?	-?	-	0	--	-
Raydon Parish																			
SS0877	Land north of Woodlands Road	Hinterland Village	10	+	--	0	++	-	--	-	N/A	-	0	-?	-?	-	0	--	+
SS0880	Land east of The Street	Hinterland Village	24	+	--	-	++	--	--	-	N/A	-	0	0	0	-	0	--	+
SS1060	Land west of Noaks Road	Hinterland Village	6	+	--	-	++	-	--	--	N/A	-	0	-?	0?	-	0	--	+
Shotley Parish																			
SS0208	Land south of The Street	Core Village	50	+++?	0	0	++	-	--	--	N/A	+	0	-?	-?	-	0	--	-
Sproughton Parish																			
SS0191	Land north of the A1071	Ipswich Policy Area	475	+++?	+	++	++	--	--	--	N/A	++	0	-?	-?	-	0	--	+
SS0223	Land north of Burstall Lane and West of B1113	Ipswich Policy Area	105	+	-	+	++	--	--	-	N/A	+	0	-?	-?	-	0	--	+
SS0299	Land at Poplar Lane	Ipswich Policy Area	475	+	0	++	++	--	--	--	N/A	++	0	-?	-?	0	+	--	+
SS0711	Land east of Loraine Way	Ipswich Policy Area	50	+	0	+	++	--	--	-	N/A	+	0	-?	-?	-	0	--	+
SS0954	Land to the west of Hadleigh Road	Ipswich Policy Area	25	+	--	+	++	--	--	--	N/A	+	0	-?	-?	-	0	--	+
SS1024	Land north of the A1071	Ipswich Policy Area	300	+	-	++	++	--	--	--	N/A	++	-	-?	-?	-	0	--	+

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
SS1177	Land north of Sproughton Road	Ipswich Policy Area	1000	+	0	++	++	--	--	-	N/A	+	--	--?	--?	--	0	--	+
SS1185	Land to the south of Poplar Lane	Ipswich Policy Area	150	++?	0	++	++	--	--	-	N/A	++	-	--?	-?	+	--	--	+
Stanstead Parish																			
SS0503	Land north-east of Valley View	Hamlet/Countryside	5	+	--	--	+	-	--	--	N/A	--	0	-?	-	0	0	--	-
<b>SS0512</b>	<b>Land east of Upper Street</b>	<b>Hamlet/Countryside</b>	<b>8</b>	-?	--	--	+	-	--	-	N/A	--	0	--?	--?	-	0	--	--
Stoke by Nayland Parish																			
<b>SS0465</b>	<b>Land north of B1068 and east of Sudbury Road</b>	<b>Hinterland Village</b>	<b>8</b>	+	0	-	+	-	--	-	N/A	-	0	--?	--?	--	0	--	-
<b>SS0709</b>	<b>Land to the south-east of Butt Road</b>	<b>Hinterland Village</b>	<b>8</b>	+	0	-	+	-	--	-	N/A	-	0	-?	--?	-	0	--	-
<b>SS1155</b>	<b>Land north of Goldenlond</b>	<b>Hinterland Village</b>	<b>10</b>	+	0	-	+	-	--	-	N/A	-	0	--?	0?	0	0	--	-
Stutton Parish																			
<b>SS0179</b>	<b>Land east of Church Road</b>	<b>Hinterland Village</b>	<b>34</b>	+	0	-	++	-	--	--	N/A	-	--	--?	-?	--	0	--	-
<b>SS0696</b>	<b>Land north of Holbrook Road</b>	<b>Hinterland Village</b>	<b>6</b>	+	0	-	++	-	--	--	N/A	-	0	-?	-?	0	0	--	-
<b>SS1125</b>	<b>Land north of Manningtree Road</b>	<b>Hinterland Village</b>	<b>14</b>	-?	-	-	++	-	--	-	N/A	--	0	-?	-?	-	0	--	-
Sudbury Parish																			
SS0509	Land north of Newton Road	Urban Area/Market Town	12	++	0	++	+	--	--	-	N/A	++	0	--?	0	0	0	-	++

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
SS0745	Elm Road/Chilton Lodge Road	Urban Area/Market Town	5	++	+	++	+	-	--	++	N/A	++	0	--?	0	0	0	+	++
SS0750	Second Avenue (Garages)	Urban Area/Market Town	5	+	+	++	++	-	--	++	N/A	++	0	0	0	0	0	--	+
SS0968	Highfield Mill	Urban Area/Market Town	5	+	-	+	++	-	--	-	N/A	+	-	--?	--?	-	0	--	+
SS1019	Land west of Ballingdon Hill and south of Sandy Lane	Urban Area/Market Town	60	+	-	+	++	--	--	-	N/A	+	0	--?	-?	-	0	--	+
Tattingstone Parish																			
<b>SS0392</b>	<b>Land west of A137, The Heath</b>	<b>Hamlet/Countryside</b>	<b>5</b>	-	--	--	++	-	--	--	N/A	--	0	-?	-?	-	0	--	-
Wenham Magna Parish																			
<b>SS0507</b>	<b>Council Depot</b>	<b>Hamlet/Countryside</b>	<b>6</b>	-	--	-	++	-	--	++	N/A	--	0	-?	--?	0	0	--	-
Wherstead Parish																			
<b>SS1020</b>	<b>Land west of Bourne Hill</b>	<b>Ipswich Policy Area</b>	<b>75</b>	+++?	-	++	++	--	--	--	N/A	++	-	--?	-?	-	0	--	+
Woolverstone Parish																			
<b>SS0203</b>	<b>Land south of Main Road</b>	<b>Hamlet/Countryside</b>	<b>5</b>	+	--	--	+	-	--	--	N/A	--	0	--?	--?	-	0	--	-
<b>SS0255</b>	<b>Land north of Glebe Lane and west of Main Road</b>	<b>Hamlet/Countryside</b>	<b>5</b>	+	--	--	+	-	--	--	N/A	--	0	--?	--?	-	0	--	-

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
Mid Suffolk District																			
Ashbocking Parish																			
SS0796	Land to the west of B1077	Hamlet/Countryside	15	-	--	--	++	--	--	-	N/A	--	-	--?	0?	-	0	--	-
Bacton Parish																			
SS0088	Former Bacton Middle School	Core Village	50	++	-	-	++	--	-	-	N/A	-	0	0	-?	+	0	--	-
SS0099	Land north-east of Turkey Hall Lane	Core Village	51	+	-	-	+	--	--	-	N/A	-	--	-?	-?	-	0	--	-
SS0266	Land north of Church Road and east of Wyverstone Road	Core Village	81	++	0	-	++	--	-	-	N/A	-	0	0	--?	+	0	--	-
SS0518	Land south of Pretymen Avenue	Core Village	85	++?	0	-	+	--	-	-	N/A	-	0	-?	-?	-	0	--	-
SS0859	Land south of Church Road	Core Village	50	++	0	-	+	--	-	-	N/A	+	0	-?	-?	-	0	--	-
Badwell Ash Parish																			
SS0020	Land south of The Broadway	Hinterland Village	13	+	--	-	++	-	--	-	N/A	--	0	--?	-?	0	0	--	-
SS0037	Land west of The Street	Hinterland Village	21	+	--	-	++	-	--	-	N/A	--	--	--?	-?	-	0	--	-
SS0078	Land south-east of Hunston Road	Hinterland Village	52	+?	--	-	++	-	--	--	N/A	--	--	--?	-?	-	0	--	-
SS0558	Land to the south of Long Thurlow Road	Hamlet/Countryside	10	-	--	--	++	-	--	-	N/A	--	0	-?	-?	-	0	--	-
SS0809	Land north of Long Thurlow Road	Hamlet/Countryside	10	-	--	--	++	-	--	-	N/A	--	0	0	-?	-	0	--	-

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
SS0814	Land north of Long Thurlow Road	Hamlet/Countryside	5	-	--	--	++	-	--	++	N/A	--	0	-?	-?	-	0	--	-
SS1292	Land north Of The Broadway	Hinterland Village	33	-	--	-	++	-	--	-	N/A	--	0	--?	-?	-	0	--	-
Barham Parish																			
SS0076	Land north of Church Lane	Ipswich Policy Area	270	++	+	+	++	--	--	--	N/A	++	0	--?	--?	--	0	--	+
SS0551	Land east of Norwich Road	Ipswich Policy Area	325	+?	-	+	++	--	--	--	N/A	+	0	--?	-?	--	0	--	+
SS1056	Land north of Pesthouse Lane	Ipswich Policy Area	20	+?	--	+	++	--	--	++	N/A	+	--	--?	0?	0	0	--	+
Barking Parish																			
SS1070	Land east of Barking Road	Urban Area/Market Town	120	++	-	++	++	--	--	--	N/A	++	0	--?	0?	-	0	+	+
SS0603	Land north of Barking Road and west of Hascot Hill	Hinterland Village	10	+?	--	-	++	-	--	-	N/A	--	0	-?	-?	-	0	--	-
Battisford Parish																			
SS0612	Land east of Bowl Road and north-west of Cobbold Close	Hamlet/Countryside	9	+	--	--	++	--	-	-	N/A	--	--	0	0?	0	0	--	-
Beyton Parish																			
SS0736	Land north of Tostock Road	Hinterland Village	9	+	--	-	++	--	--	++	N/A	--	0	-?	-?	-	0	--	-
SS1065	Land west of Church Road	Hinterland Village	10	+?	--	-	++	--	--	--	N/A	--	0	-?	-?	-	0	--	-

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
Botesdale Parish																			
SS1248	Land south of Mill Road	Core Village	25	++	0	-	++	--	-	-	N/A	+	-	-?	-?	-	0	--	-
Botesdale & Rickinghall Parish																			
SS0091	Land between The Street and A143	Core Village	100	++?	--	-	+	--	-	-	N/A	-	0	0	--?	--	0	--	-
SS0129	<i>Land south of Back Hills</i>	<i>Core Village</i>	<i>40</i>	+++?	0	-	++	--	--	-	N/A	+	-	--?	--	-	0	--	-
SS0949	<i>Land north of Mill Road</i>	<i>Core Village</i>	<i>69</i>	++	0	-	++	--	--	-	N/A	+	--	-?	-?	-	0	--	-
SS1190	<i>Land north of Gardenhouse Lane</i>	<i>Core Village</i>	<i>42</i>	+	-	-	+	--	-	-	N/A	-	0	0	-?	-	0	--	-
Bramford Parish																			
SS0121	Land south of Fitzgerald Road	Ipswich Policy Area	100	++?	+	+	+	--	--	--	N/A	+	0	--?	-?	-	0	--	+
SS0478	<i>Land east of The Street</i>	<i>Ipswich Policy Area</i>	<i>190</i>	+	--	+	+	--	--	--	N/A	+	--	--?	-?	-	0	--	+
SS0636	<i>Land between Bramford Road and the A14</i>	<i>Ipswich Policy Area</i>	<i>14</i>	+	+	++	+	--	--	-	N/A	++	0	--?	-?	0	--	--	+
Brome & Oakley Parish																			
SS0542	Land south of the B1118	Hinterland Village	5	-	--	--	++	-	0	-	N/A	--	0	--?	-?	-	0	--	-
SS1011	Land north of B1118	Hinterland Village	10	-	--	--	++	-	0	-	N/A	--	0	--?	-	-	0	--	-
Claydon Parish																			

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
SS0119	Land west of Old Ipswich Road	Ipswich Policy Area	21	+	0	+	+	--	--	-	N/A	+	0	--?	0?	-	0	--	+
<b>SS0861</b>	<b>Land south of Church Lane</b>	<b>Ipswich Policy Area</b>	<b>75</b>	+++	++	+	++	--	--	-	N/A	++	--	--?	-?	-	0	--	-
SS1239	Land east of Old Ipswich Road	Ipswich Policy Area	250	+	++	+	+	--	--	-	N/A	++	--	--?	-?	-	0	--	+
Coddendam Parish																			
SS1268	Land east of School Lane	Hinterland Village	8	+	--	-	++	-	--	-	N/A	--	0	--?	0?	-	0	--	-
Combs Parish																			
<b>SS0869</b>	<b>Land west of Bildeston Road</b>	<b>Hinterland Village</b>	<b>5</b>	-	--	-	++	--	-	-	N/A	--	0	0	0?	-	0	--	-
Cotton Parish																			
SS0806	Land north-east of Mill Hill	Hamlet/Countryside	15	+	--	--	++	-	-	-	N/A	--	0	-?	0?	-	0	--	-
SS1187	Land east of Stonham Road	Hamlet/Countryside	10	-	--	--	++?	-	-	++	N/A	--	0	--?	-?	0	0	--	-
<b>SS1188</b>	<b>Land north of Mendlesham Road</b>	<b>Hamlet/Countryside</b>	<b>5</b>	+	--	--	++	-	-	-	N/A	--	--	-?	0?	-	0	--	-
Creeting St Mary Parish																			
<b>SS0009</b>	<b>Land between Jack's Green Road and A14</b>	<b>Urban Area/Market Town</b>	<b>43</b>	+	-	+	++	--	--	-	N/A	+	--	--?	-?	-	0	--	+
<b>SS0127</b>	<b>Land west of Jacks Green Road</b>	<b>Urban Area/Market Town</b>	<b>5</b>	+	--	+	++	-	--	-	N/A	+	0	-?	0?	-	0	--	+
Debenham Parish																			

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
SS0031	Land north of Ipswich Road	Core Village	140	++	0	-	+	--	-	-	N/A	+	-	--?	-?	-	0	++	+
SS0267	Land north of Gracechurch Street	Core Village	150	++?	++	-	+	--	-	-	N/A	++	0	--?	-?	-	0	++	+
SS0268	Land east of Aspoll Road	Core Village	87	++	++	-	+	--	-	-	N/A	+	0	--?	-?	-	0	++	+
SS0642	Land to the north of Low Road	Core Village	250	++?	+	-	+	--	-	-	N/A	+	--	-?	-?	--	0	+	-
SS0902	Land south of Low Road	Core Village	18	++	0	-	+	--	-	-	N/A	+	--	--?	-?	-	0	++	+
Elmswell Parish																			
SS0039	Land north of Church Road	Core Village	60	-	--	0	+	--	--	--	N/A	-	0	--?	-?	-	0	--	++
SS0085	Land east of Ashfield Road	Core Village	106	+	-	-	++	--	--	-	N/A	-	0	0	--?	-	0	--	+
SS0096	Land south of Church Road	Core Village	38	+	0	0	+	--	--	--	N/A	+	--	0	0?	-	0	--	+
SS0107	Land north-west of School Road	Core Village	50	++?	-	0	+	--	--	-	N/A	+	0	0	-	-	0	--	++
SS0132	Land west of Station Road	Core Village	100	++?	--	0	+	--	--	-	N/A	-	0	0	-?	-	0	--	++
Eye Parish																			
SS0014	Land north of Maple Way	Urban Area/Market Town	150	++	+	+	+	--	0	--	N/A	++	0	--?	0?	-	0	+	+
SS0614	Land north of Millfield	Urban Area/Market Town	34	++?	+	++	+	-	0	-	N/A	++	0	0	-?	-	0	+	+

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
SS0615	Land at allotments north of Millfield	Urban Area/Market Town	72	++?	+	+	+	-	0	-	N/A	++	0	0	-?	-	0	+	+
SS0672	Land north of Church Street	Urban Area/Market Town	12	+	++	+	+	-	0	++	N/A	++	0	-?	--?	0	0	++	+
SS1118	Land north of Magdalen Street	Urban Area/Market Town	80	++?	++	+	+	--	0	++	N/A	++	0	--?	-?	?	--	++	+
SS1202	Land south of Eye Airfield	Urban Area/Market Town	174	+?	+	++	+	-	0	-	N/A	++	-	-?	-	--	0	--	+
Finningham Parish																			
SS0380	Land south of Wickham Road	Hinterland Village	10	+	--	-	++	-	-	--	N/A	--	-	-?	-?	-	0	--	-
SS0849	Land west Gislingham Road	Hinterland Village	10	+	--	-	++	-	-	-	N/A	--	0	-?	-?	?	0	--	-
Fressingfield Parish																			
SS0058	<i>Land between Oatfields and Stradbroke Road</i>	<i>Hinterland Village</i>	18	++	0	-	++	-	-	-	N/A	-	0	--?	-?	-	0	--	-
Great Blakenham Parish																			
SS0654	Land south of Chalk Hill Lane and West of Hood Drive	Ipswich Policy Area	8	+?	--	+	++	-	--	--	N/A	-	--	--?	-?	-	0	--	-
SS0864	Land north of Gipping Road	Ipswich Policy Area	20	+	-	++	++	--	--	++	N/A	+	0	--?	0?	0	-	--	-
SS0952	Land south of Gipping Road	Ipswich Policy Area	10	+	-	++	++	-	--	++	N/A	+	0	--?	-?	0	0	--	-

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
Great Bricett Parish																			
SS1293	Land south of Great Bricett Business Park	Hamlet/Countryside	51	-	--	--	+	--	-	-	N/A	--	0	--?	-?	-	--	--	-
Great Finborough Parish																			
SS0860	Land to the east of Pear Tree Place	Hinterland Village	21	+	0	-	++	--	-	-	N/A	-	0	--?	-?	-	0	--	-
SS1055	Land west of High Road	Hinterland Village	25	+	0	-	++	--	-	-	N/A	-	-	--?	-?	-	0	--	-
Haughley Parish																			
SS0004	Land south of Bacton Road	Core Village	98	+	0	-	++	--	--	-	N/A	-	0	--?	-?	-	0	--	-
SS0047	Land west of Fishponds Way	Core Village	65	+	-	-	++	--	--	--	N/A	-	0	--?	-?	-	0	--	-
SS0270	Land north of Station Road	Core Village	29	+	-	-	++	--	-	--	N/A	-	0	0	0?	-	0	--	-
Henley Parish																			
SS0171	Land south of Ashbocking Road	Hinterland Village	20	+	0	-	++	--	--	-	N/A	-	0	--?	0?	-	0	--	-
SS0832	Land west of Main Road	Hinterland Village	45	+	-	-	++	--	--	--	N/A	-	0	--?	-?	0	0	--	-
Hessett Parish																			
SS0678	Land south of Hubbard's Lane and east of The Green	Hinterland Village	5	+	--	-	++	--	--	-	N/A	--	0	--?	-?	-	0	--	-
Hoxne Parish																			

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
SS0728	Land to the south of Denham Road	Hinterland Village	30	+	0	-	++	--	-	++	N/A	-	0	--?	--?	-	0	--	-
Hunston Parish																			
SS0815	Land south of The Street	Hamlet/Countryside	5	-	--	--	++	-	--	--	N/A	--	0	-?	--?	-	0	--	-
Kenton Parish																			
SS1189	Land east of Eye Road and north of Church Close	Hamlet/Countryside	10	-	--	--	++?	--	-	-	N/A	--	-	-?	-?	-	0	--	-
Laxfield Parish																			
SS0069	Land south of Framlingham Road	Hinterland Village	49	+	0	-	+	-	-	-	N/A	-	0	--?	0?	-	0	--	-
SS0616	Land east of Mill Road	Hinterland Village	13	+	0	-	+	-	-	-	N/A	-	--	-?	0?	-	0	--	-
Mellis Parish																			
SS0698	Land to the south-west of Yaxley Road	Hinterland Village	5	+	0	-	++	-	-	++	N/A	-	0	--?	--?	-	0	--	+
Mendham Parish																			
SS0550	Land east of Withersdale Road, opposite Mendham Primary School	Hinterland Village	6	-	0	-	++	-	--	-	N/A	-	0	--?	-?	-	0	--	+
Mendlesham Parish																			
SS0065	Land south of Glebe Way	Core Village	75	++?	0	-	++	--	-	-	N/A	-	--	-?	-?	-	0	--	-

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
SS0083	Land north-east of Chapel Road	Core Village	50	+	-	-	++	--	-	-	N/A	-	0	0	-?	-	0	--	-
Metfield Parish																			
SS0863	Land north of B1123	Hinterland Village	25	+	--	-	++	--	-	-	N/A	--	--	-?	-?	-	0	--	-
Needham Market Parish																			
SS0028	Land north of Barking Road	Urban Area/Market Town	300	++	0	+	++	--	--	--	N/A	++	--	--?	-?	-	0	+	+
SS0530	<i>Former Mid Suffolk District Council Offices and Car Park</i>	<i>Urban Area/Market Town</i>	64	+	0	+	+	--	--	++	N/A	++	0	--?	--?	0	--	++	++
SS0669	<i>Former Needham Market Middle School</i>	<i>Urban Area/Market Town</i>	41	++	0	+	+	--	--	++	N/A	++	-	--?	--?	0	0	++	++
SS1005	<i>Former Mid Suffolk District Council Offices and Car Park</i>	<i>Urban Area/Market Town</i>	30	+	-	+	+	--	--	++	N/A	+	0	-?	0?	+	0	++	++
SS1153	Land south-west of Stowmarket Road	Urban Area/Market Town	134	+?	--	+	++	--	--	-	N/A	+	--	--?	-?	--	0	+	+
SS1199	<i>Land west of Stowmarket Road</i>	<i>Urban Area/Market Town</i>	66	+	--	+	+	--	--	-	N/A	+	0	-?	-?	--	0	+	+
Norton Parish																			
SS0105	Land between Ixworth Road and Hawes Lane	Hinterland Village	12	+	0	-	++	--	--	-	N/A	-	--	--?	0?	-	0	--	-

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
SS1088	Land north of Ashfield Road	Hamlet/Countryside	8	+	-	--	++	--	--	-	N/A	--	0	0	0?	-	0	--	-
Old Newton Parish																			
SS0012	Land north of Falconer Avenue	Hinterland Village	56	-	--	-	++	--	-	-	N/A	--	0	--?	--?	-	0	--	-
SS0131	Land south of Stowmarket Road	Hinterland Village	64	-?	-	-	++	-	-	-	N/A	--	0	-?	-?	-	0	--	-
SS1021	Land south of Church Road	Hinterland Village	10	-	-	-	++	-	-	-	N/A	--	0	0	-?	-	0	--	-
Onehouse Parish																			
SS0029 <sup>40</sup>	Land south of Union Road	Urban Area/Market Town	300	+?	++	+	++	--	--	--	N/A	++	0	--?	--?	-	0	--	+
SS0157 <sup>41</sup>	Land south of Union Road	Urban Area/Market Town	100	+	+	0	++	--	--	--	N/A	+	0	--?	-?	-	0	--	+
SS0343	Land south of Forest Road	Urban Area/Market Town	10	+	-	0	++	-	-	-	N/A	+	0	--?	-?	-	0	--	+
Pettaugh Parish																			
SS0706	Land to the west of Debenham Way	Hamlet/Countryside	10	-	--	--	++	--	--	-	N/A	--	0	0	0?	-	0	--	-
Rattlesden Parish																			
SS0358	Land north of Top Road	Hamlet/Countryside	8	+?	-	--	++	--	--	-	N/A	--	0	0	0?	-	0	--	-

<sup>40</sup> Site SS0029 was allocated in the Stowmarket Area Action Plan (2013).

<sup>41</sup> Site SS0157 was allocated in the Stowmarket Area Action Plan (2013).

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
SS0500	Land east of Mitchery Lane	Hamlet/Countryside	22	+	-	--	++	--	--	-	N/A	--	0	0	-	-	0	--	-
Redgrave Parish																			
SS0818	Land south of B1113 Hall Lane, opposite junction with Half Moon Lane	Hinterland Village	9	+	--	-	++	-	-	-	N/A	-	0	--?	--?	-	0	--	-
SS1266	Land south of Half Moon Lane	Hinterland Village	15	+	--	-	++	--	-	-	N/A	--	0	--?	--?	-	0	--	-
Somersham Parish																			
SS0145	Land west of Main Road	Hinterland Village	30	+	-	-	++	--	--	-	N/A	-	0	--?	-?	-	0	--	-
Stoke Ash Parish																			
SS0723	Land to the west of The Street	Hamlet/Countryside	8	-	--	-	++	-	--	-	N/A	--	--	0	-?	-	0	--	-
Stonham Aspal Parish																			
SS0141	Land south of The Street	Hinterland Village	35	-?	-	-	++	--	-	-	N/A	--	0	--?	-?	-	0	--	-
Stonham Earl Parish																			
SS1058	Land north east of Haggars Mead	Hinterland Village	20	+	--	-	++	--	--	-	N/A	--	0	--?	0?	-	0	--	-
Stonham Parva Parish																			
SS0163	Land east of Norwich Road	Hinterland Village	5	+	--	-	++	--	--	-	N/A	--	0	-?	-?	0	0	--	-
SS0810	Land west of Norwich Road	Hinterland Village	5	+?	--	-	++	--	--	-	N/A	--	0	-?	-?	0	0	--	-

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
Stowmarket Parish																			
SS0064	Land south of Gun Cotton Way	Urban Area/Market Town	68	+	-	++	+	--	--	--	N/A	++	0	--?	-?	0	0	-	+
SS0101	Former Stowmarket Middle School	Urban Area/Market Town	40	++	++	+	+	--	-	++	N/A	++	0	-?	-?	0	0	++	++
SS0264	Ashes Farm	Urban Area/Market Town	575	+++?	0	++	++	--	--	--	N/A	++	--	--?	--?	-	0	+	++
SS0668	Land south of Creting Road West	Urban Area/Market Town	25	+	0	++	+	--	--	++	N/A	++	--	--?	-?	0	0	+	++
SS1022	Chilton Leys	Urban Area/Market Town	600	+	+	+	++	--	-	--	N/A	++	-	--?	-	--	0	--	+
SS1288	Land east and west of Prentice Road	Urban Area/Market Town	60	+	0	++	+	--	--	-	N/A	++	-	--?	-?	0	0	++	++
Stowupland Parish																			
SS0073	Land north of B1115	Urban Area/Market Town	143	+	+	+	++	--	--	-	N/A	++	--	0	-?	-	0	--	+
SS0151	Land south of Church Road	Core Village	18	+	++	0	++	--	-	-	N/A	+	0	0	-?	-	0	--	+
SS1071	Land south of Stowmarket Road	Urban Area/Market Town	300	+	++	+	++	--	--	-	N/A	++	-	--?	-?	--	0	--	+
SS1106	Land south of Gipping Road	Core Village	100	+	++	0	++	--	-	-	N/A	+	--	0	-?	-	0	--	+

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
Stradbroke Parish																			
SS0079	Land west of Queen Street	Core Village	75	++?	++	-	+	-	-	-	N/A	+	-	--?	--?	-	0	--	-
SS0080	Land east of Queen Street	Core Village	10	+	+	-	+	-	--	-	N/A	-	0	0	-?	-	0	--	-
SS0087	Land south of Ash Plough and west of Queen Street	Core Village	20	+	++	-	+	-	-	-	N/A	+	0	-?	-?	-	0	--	-
SS0575	Land east of Queen Street	Core Village	30	++	++	-	+	-	--	-	N/A	+	--	--?	--?	-	0	--	-
SS0681	Land east of Farriers Close	Core Village	35	++	++	-	+	-	-	-	N/A	+	-	-?	-?	-	0	--	-
SS1043	Land south of New Street	Core Village	60	++	++	-	+	-	-	-	N/A	+	--	-?	-?	-	0	--	-
SS1198	Land north of Laxfield Road	Core Village	45	+	+	-	+	--	-	-	N/A	-	--	--?	-?	-	0	--	-
Thorndon Parish																			
SS0453	Land north of Stoke Road and west of Clint Road	Hinterland Village	20	+	--	-	++	--	-	--	N/A	-	0	--?	-	0	0	--	+
Thurston Parish																			
SS0006	Land west of Barton Road	Core Village	129	+	0	0	+	--	--	-	N/A	+	0	--?	-?	-	0	--	+
SS0008	Land south of Barrells Road	Core Village	6	+	0	-	+	--	--	-	N/A	-	0	0	0?	-	0	--	-
SS0019	Land west of Meadow Lane	Core Village	64	+	++	-	+	--	--	-	N/A	+	0	-?	-?	-	0	--	++
SS0075	Land east of Ixworth Road	Core Village	200	+?	+	-	+	--	--	--	N/A	+	0	-?	-?	-	0	--	+

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
SS0090	Land east of Church Road and south of Old Post Office Lane	Core Village	25	+	+	-	+	--	--	-	N/A	+	0	--?	-?	-	0	--	+
SS0319	Land south of Heath Road	Core Village	110	-	-	+	++	--	--	-	N/A	+	0	--?	-?	-	0	--	++
SS0716	Land west of Ixworth Road	Core Village	250	+?	+	-	++	--	--	-	N/A	+	0	0	-?	-	0	--	+
SS0729	Land south of Beyton Road	Core Village	200	+	+	0	+	--	--	-	N/A	+	-	--?	0?	-	0	--	++
SS0765	Land to the West of Church Road	Core Village	15	+	++	-	+	--	--	-	N/A	+	--	--?	-?	-	0	--	++
Thwaite Parish																			
SS0786	Land to the south of Wickham Road and west of A140	Hinterland Village	10	-	--	-	++	--	--	-	N/A	--	0	--?	-?	-	0	--	-
SS1228	Land west of Church Lane	Hinterland Village	5	-	--	-	++	-	-	-	N/A	--	0	-?	-?	-	0	--	-
Tostock Parish																			
SS0513	Land between New Road and Leys Road	Hinterland Village	5	+	--	-	++	--	--	-	N/A	-	0	--?	-?	-	0	--	+
Walsham-le-Willows Parish																			
SS0040	Land west of Wattisfield Road	Core Village	60	-	-	-	++	-	--	-	N/A	--	0	0	0?	-	0	--	-
SS0369	Land east of Wattisfield Road	Core Village	22	-	-	-	++	-	-	-	N/A	--	0	0	0?	-	0	--	--
Wattisfield Parish																			

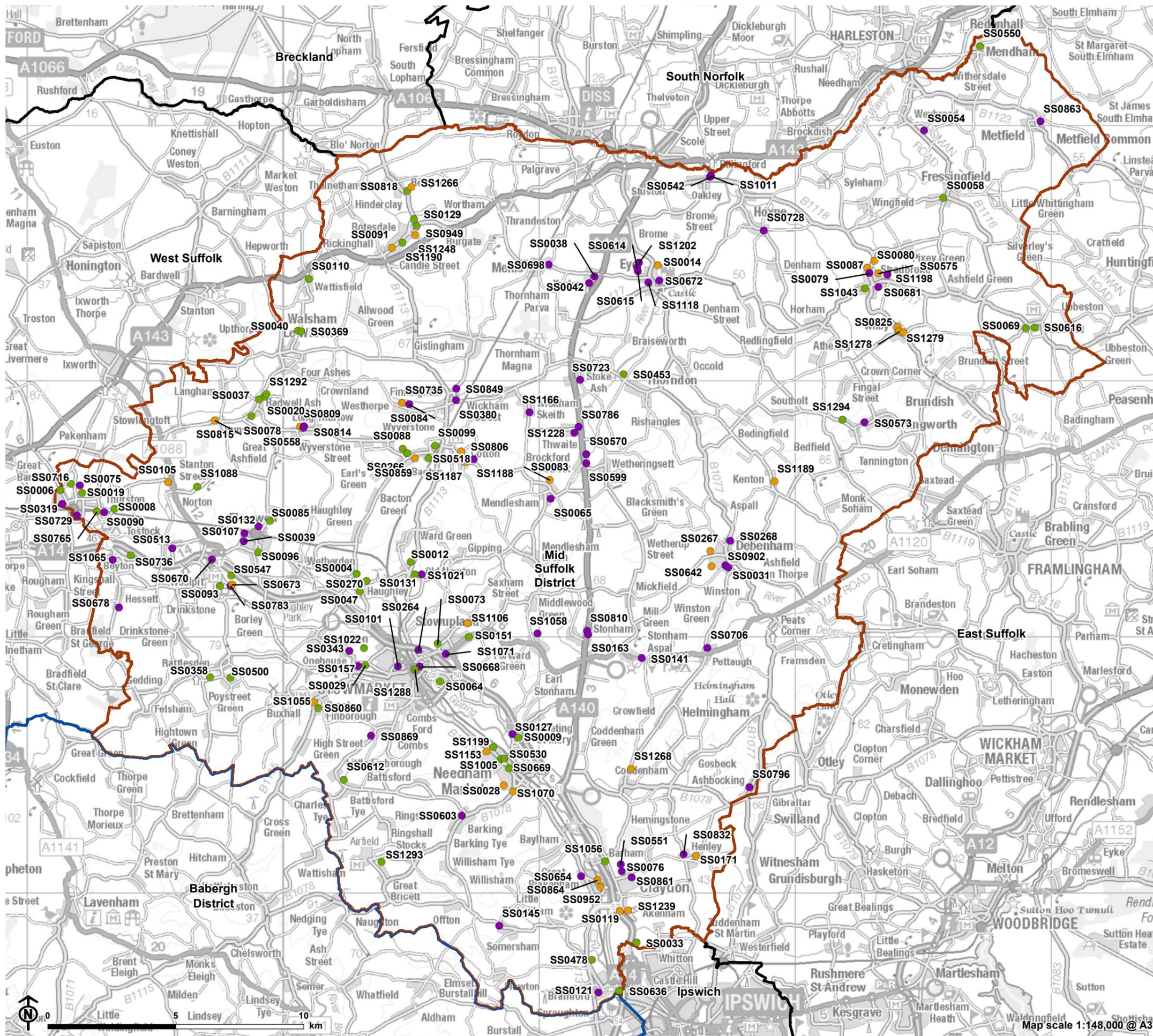
Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
SS0110	Land east of The Street	Hamlet/Countryside	8	+	--	--	++	-	-	-	N/A	--	0	--?	--?	-	0	--	-
Westhorpe Parish																			
SS0084	Land north of The Street	Hamlet/Countryside	10	+	--	--	++	--	--	-	N/A	--	0	--?	-?	-	0	--	-
SS0735	Land south of Church Road	Hamlet/Countryside	10	+	--	--	++	-	--	-	N/A	--	0	-?	-?	-	0	--	-
Wetheringsett Parish																			
SS0570	Land east of A140 The Street	Hamlet/Countryside	10	-	--	-	++	--	--	-	N/A	--	--	--?	0?	-	0	--	-
SS0599	Land to the north-east of the junction between The Street and Cedars Hill	Hamlet/Countryside	10	-?	-	-	++	--	--	-	N/A	--	-	--?	0?	-	0	--	-
Weybread Parish																			
SS0054	Land north-east of The Street	Hamlet/Countryside	15	-?	--	-	++	0	-	-	N/A	--	0	0	-?	-	0	--	+
Whitton Parish																			
SS0033	Land west of Old Norwich Road	Ipswich Policy Area	190	+	-	++	+	--	--	-	N/A	+	--	--?	-?	-	0	--	+
Wickham Skeith Parish																			
SS1166	Land west of Grange Road	Hamlet/Countryside	5	-	--	--	++	-	-	-	N/A	--	-	-?	0?	0	0	--	-
Wilby Parish																			
SS0825	Land west of B1118	Hamlet/Countryside	5	-	+	--	+	-	-	-	N/A	--	0	0	-?	-	0	--	-

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
SS1278	Land to the south of Willow Farm	Hamlet/Countryside	5	-?	+	--	+	0	-	-	N/A	--	0	0	-?	-	0	--	-
SS1279	Land to the west of Brundish Road	Hamlet/Countryside	5	-	+	--	+	0	-	++	N/A	--	0	-?	-?	-	0	--	-
Woolpit Parish																			
<b>SS0093</b>	<b>Land east of Green Road</b>	<b>Core Village</b>	<b>49</b>	<b>++</b>	0	+	+	--	--	-	N/A	<b>++</b>	0	0	-?	-	0	--	+
<b>SS0547</b>	<b>Land south of Old Stowmarket Road</b>	<b>Core Village</b>	<b>120</b>	<b>++</b>	0	+	+	--	--	-	N/A	<b>++</b>	0	--?	-?	-	0	--	+
<b>SS0670</b>	<b>Land north-east of The Street</b>	<b>Core Village</b>	<b>500</b>	<b>++</b>	-	+	+	--	--	--	N/A	<b>++</b>	0	--?	--?	--	0	--	+
SS0673	Land north-east of Heath Road	Core Village	10	++	0	+	+	--	--	-	N/A	++	0	-?	0?	-	0	--	+
<b>SS0783</b>	<b>Land west of Heath Road</b>	<b>Core Village</b>	<b>30</b>	<b>++?</b>	0	+	+	--	--	-	N/A	<b>++</b>	--	0	-?	-	0	--	+
Worlingworth Parish																			
<b>SS0573</b>	<b>Land south of Church Road</b>	<b>Hamlet/Countryside</b>	<b>5</b>	--	-	--	<b>++</b>	-	--	-	N/A	--	0	0	0?	0	0	--	-
<b>SS1294</b>	<b>Land south of Shop Street</b>	<b>Hamlet/Countryside</b>	<b>26</b>	-?	0	--	<b>++</b>	--	-	-	N/A	--	0	-?	-?	-	0	--	-
Yaxley Parish																			
<b>SS0038</b>	<b>Land east of Old Ipswich Road</b>	<b>Hinterland Village</b>	<b>15</b>	+	--	+	<b>++</b>	-	--	-	N/A	+	0	-?	--?	-	0	--	+
<b>SS0042</b>	<b>Land west of Old Ipswich Road</b>	<b>Hinterland Village</b>	<b>20</b>	+	--	0	<b>++</b>	-	--	-	N/A	-	0	--?	-?	-	0	--	-

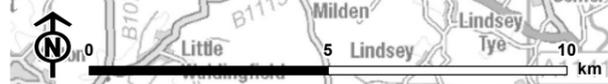




Figure 6.2: Residential sites subject to SA in Mid Suffolk District



- Babergh District
  - Mid Suffolk District
  - Neighbouring local authority
- Site**
- Committed and allocated
  - Allocated not committed
  - Not committed or allocated



## Employment sites

**6.124** The employment sites that were subject to SA are shown in **Figures 6.3 and 6.4**, indicating which sites are already committed (i.e. have planning consent) and therefore automatically allocated, which sites are allocated that are not yet committed (i.e. do not yet have planning consent), and which sites were discounted by BMSDC for inclusion as allocations in the JLP.

**6.125** It was considered that a number of the SA Objectives were not relevant to the appraisal of employment sites, in that allocation for employment would have been unlikely to give rise to significant effects:

- SA Objective 1 (To improve the health and wellbeing of the population overall and reduce health inequalities).
- SA Objective 2 (To maintain and improve levels of education and skills in the population overall).
- SA Objective 4 (To meet the housing requirements of the whole community).
- SA Objective 8 (To promote the sustainable management of waste).

**6.126** It is recognised that economic activity can have an effect on some of these SA Objectives (e.g. being in employment can be good for health), but it was considered that these relationships are more relevant to other policies in the JLP than individual sites.

**6.127** **Tables 6.4 and Table 6.5** show the numbers of employment sites appraised for each settlement hierarchy category for each District, as well as the total hectareage of those sites and the average site size.

**Table 6.4: Summary of reasonable employment sites subject to SA in Babergh**

JLP settlement hierarchy category	Number of sites subject to SA	Total hectares	Average hectares
Ipswich Policy Area	11	193	17.5
Market Towns and Urban Areas	4	11	2.8
Core Villages	2	26	13
Hinterland Villages	2	15	7.5
Hamlets and the Countryside	2	4	2
<b>Total</b>	<b>21</b>	<b>249</b>	<b>11.9</b>

BMSDC

**Table 6.5: Summary of reasonable employment sites subject to SA in Mid Suffolk**

JLP settlement hierarchy category	Number of sites subject to SA	Total hectares	Average hectares
Ipswich Policy Area	5	98	19.6
Market Towns and Urban Areas	10	41	4.1
Core Villages	12	181	15.1
Hinterland Villages	3	44	14.7
Hamlets and the Countryside	2	14	7
<b>Total</b>	<b>32</b>	<b>378</b>	<b>11.8</b>

BMSDC

**6.128** It can be seen from these tables that over 50% more potential employment sites were subject to SA in Mid Suffolk than in Babergh. The average site size was about the same in both Districts, although the size of individual sites varied enormously from very small scale (e.g. 1 hectare or less), to large scale (e.g. 50 hectares or more).

**6.129** In Babergh District, most potential employment sites were in the Ipswich Policy Area, whereas in Mid Suffolk most potential employment sites were in the Market Towns and Urban Areas, or the Core Villages. In both Districts, few potential employment sites were considered in the Hinterland Villages, Hamlets and Countryside.

**6.130** The findings of the SA of employment sites for the other SA Objectives are presented below. The detailed appraisal findings can be found in **Appendix E (Detailed Appraisal of Site Options)**.

**SA Objective 3: To reduce poverty and social exclusion and ensure access to jobs and services**

**Significant positive effects**

Significant positive effect (++)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	N/A	N/A	N/A	N/A	N/A
Reasonable alternative	N/A	N/A	N/A	N/A	N/A
Mid Suffolk District					
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	N/A	N/A	N/A	N/A	N/A
Reasonable alternatives	SS0937	Land east of Bramford Road / B1067	11	Bramford	Ipswich Policy Area

**6.131** Only one site is expected to have a significant positive effect against SA Objective 3 (To reduce poverty and social exclusion and ensure access to jobs and services). This site is a reasonable alternative and scores strongly against this objective because it falls within one of the 20% most deprived areas within the JLP area and therefore offers potential for regeneration. Additionally, it is located at the top of the settlement hierarchy, within the Ipswich Policy Area.

Therefore, it is likely to be located within close proximity to a large number of people giving them access to employment opportunities.

**Significant negative effects**

**6.132** None of the employment sites are expected to have a significant negative effect against SA Objective 3 (To reduce

poverty and social exclusion and ensure access to jobs and services).

**Possible mitigation**

**6.133** As no significant effects were identified, mitigation is not necessary.

### SA Objective 5: To conserve and enhance water quality and resources

#### Significant positive effects

**6.134** Under the site appraisal methodology, it is not possible for any site to score a significant positive effect against SA Objective 5 (To conserve and enhance water quality and resources). The methodology is focused on preventing harm to the water environment.

#### Significant negative effects

Significant negative effect (--)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	N/A	N/A	N/A	N/A	N/A
Reasonable alternative	SS0811	Land to the north of Springlands Way (A134)	0	Long Melford	Urban Area/Market Towns
	SS0934	Land east of High Street & Harefield Rd and west of A134	15	Long Melford	Core Village
	SS0948	The Hollies, Chilton Airfield	8	Chilton	Hinterland Village
	SS1027	Land north of The Street	3	Wherstead	Ipswich Policy Area
	SS1144	Land south of Lavenham Road	1	Brent Eleigh	Hamlet/Countryside
	SS1168	Land west of the A137	11	Wherstead	Ipswich Policy Area
	SS1178	Land north of Sproughton Road	40	Sproughton	Ipswich Policy Area
	SS1273	Park Farm Barns and land west of Vicarage Land	10	Wherstead	Ipswich Policy Area
Mid Suffolk District					
Allocated sites that are committed	SS0773	Lawn Farm	17	Woolpit	Core Village
	SS1032	Land south of Gun Cotton Way	11	Stowmarket	Urban Area/Market Town

Significant negative effect (--)					
Allocated sites	SS0928	Land at Eye Airfield	10	Eye	Urban Area/Market Town
	SS1223 <sup>42</sup>	Land at Mill Lane	79	Stowmarket	Ipswich Policy Area
Reasonable alternatives	SS0327	Land at Hill View Farm	3	Claydon	Ipswich Policy Area
	SS0328	Goldstar Transport Ltd, Elmswell Road	4	Woolpit	Core Village
	SS0330	Land at Grove Lane	14	Elmswell	Core Village
	SS0333	Land at Tower Farm	3	Mendlesham	Core Village
	SS0536	Land east of Norwich Road	17	Wetheringsett-cum-Brockford	Core Village
	SS0655	Land to the east of Tannery Road	38	Combs	Hinterland Village
	SS0782	Land north of New Haughley Street	5	Wetherden	Hamlet/Countryside
	SS0787	Land south of A14	4	Woolpit	Core Village
	SS0791	Land west of Tostock Road and south of A14	9	Drinkstone	Hamlet/Countryside
	SS0792	Land north of A1120 and east of Church Lane	5	Stonham Earl	Hinterland Village
	SS0916	Land to the west of A14	4	Claydon	Ipswich Policy Area
	SS0924	Land south of New Road and north of A14	1	Tostock	Hinterland Village
	SS0926	Land west of Old Ipswich Road	1	Claydon	Ipswich Policy Area
	SS0930	Land north-east of Tot Hill	1	Stowmarket	Urban Area/Market Town
	SS0939	Land east of Rectory Hill and south of The Street	17	Botesdale & Rickinghall	Core Villages
	SS1033	Council Offices	1	Needham Market	Urban Area/Market Town
	SS1154	Land to the south of the A14	3	Woolpit	Core Village
	SS1156	Land south of Old Stowmarket Road	30	Woolpit	Core Village
	SS1158	Land south-west of Wood Road	2	Woolpit	Core Village
SS1249	Land south of Mill Road	0	Botesdale	Core Village	
SS1282	Land off Gipping Way, Stowmarket Site D	1	Stowmarket	Urban Area/Market Town	

**6.135** The potential for significant negative effects against SA Objective 5 (To conserve and enhance water quality and resources) were determined using four different criteria. Significant negative effects could be recorded on the basis of a single criterion or a number of criteria cumulatively. In total,

just over 60% of employment sites were considered to have the potential for significant negative effects, prior to mitigation.

**6.136** Three of the sites are expected to have a significant negative effect against this objective because they have a major negative effect against one of the four criteria. Sites

<sup>42</sup> SS1223 was allocated in the Stowmarket Area Action Plan (2013).

SS0333 (Land at Tower Farm, Mendlesham) and SS0939 (Land east of Rectory Hill and south of The Street, Rickingham) have a major negative effect recorded against criterion 5a (Source Protection Zones) because they are both located in Source Protection Zone 1. The other site, SS0791 (Land west of Tostock Road and south of A14, Drinkstone), has a major negative effect recorded against criterion 5d (Foul Sewerage Network Capacity) because it scores Red in the Foul Sewerage Network Capacity RAG Assessment. This is due to the fact it is remote from the nearest sewer and therefore connecting to the foul sewerage network may not be viable. This site is not allocated but is a reasonable alternative employment site.

**6.137** The remaining sites are expected to have a significant negative effect overall because they score a minor negative effect against three of more criteria.

#### Possible mitigation

**6.138** Mitigation to prevent pollution to water resources in Source Protection Zones needs to be determined on a site-by-site basis, taking into account the nature of the development and the risk posed to the water resource concerned. This will require engagement with the Environment Agency.

**6.139** Broader water resource and wastewater treatment issues are normally dealt with through water resource management plans and asset management plans respectively, which aim to provide long-term plans for the management of the water environment, and are produced by water companies, in liaison with the Environment Agency and the Water Resources Regulation Authority (Ofwat). Individual developments may be required to make a financial contribution (e.g. to the upgrading of a water recycling centre) if the upgrading is linked to the development concerned.

## SA Objective 6: To maintain and where possible improve air quality and reduce noise pollution

### Significant positive effects

**6.140** Under the site appraisal methodology, it is not possible for any site to score a significant positive effect against SA Objective 6 (To maintain and where possible improve air quality and reduce noise pollution). This is because the overall increase in housing and population numbers across both

Districts will result in an increase in private car use, as well as the train, which will have adverse effects on air quality and noise pollution. Development will also not result in positive effects on odour.

### Significant negative effects

Significant negative effect (--)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	SS0721	Sproughton Enterprise Park / Former Sugar Beet Factory Site	50	Sproughton	Ipswich Policy Area
	SS1035	Land to the east of Frog Hall Lane	6	Hadleigh	Urban Area/Market Town
Reasonable alternative	SS0227	Land between London Road and A12	1	Copdock and Washbrook	Ipswich Policy Area
	SS0726	Land to the south of Corn Hatches Lane	7	Elmsett	Hinterland Village
	SS0811	Land to the north of Springlands Way (A134)	0	Long Melford	Urban Area/Market Town
	SS0918	Land east of London Road	30	Copdock and Washbrook	Ipswich Policy Area
	SS0919	Lane west of London Road and south of Folly Lane	7	Copdock and Washbrook	Ipswich Policy Area
	SS0934	Land east of High Street & Harefield Rd and west of A134	15	Long Melford	Core Village
	SS0942	Land north of Newton Road / A134	11	Chilton	Core Village
	SS0944	Land north of Elm lane	9	Copdock and Washbrook	Ipswich Policy Area
	SS0945	Land south of Mill Lane and west of London Road	20	Copdock and Washbrook	Ipswich Policy Area
	SS0948	The Hollies, Chilton Airfield	8	Chilton	Hinterland Village
	SS1027	Land north of The Street	3	Wherstead	Ipswich Policy Area
	SS1031	Land south of Ipswich Road	5	Hadleigh	Urban Area/Market Town
SS1144	Land south of Lavenham Road	1	Brent Eleigh	Hamlet/Countryside	

Significant negative effect (--)					
	SS1168	Land west of the A137	11	Wherstead	Ipswich Policy Area
	SS1178	Land north of Sroughton Road	40	Sroughton	Ipswich Policy Area
	SS1225	Land West of Bull Lane	3	Acton	Hamlets/Countryside
	SS1260	Land south east of A12	12	Copdock	Ipswich Policy Area
	SS1273	Park Farm Barns and land west of Vicarage Land	10	Wherstead	Ipswich Policy Area
Mid Suffolk District					
Allocated sites that are committed	SS0773	Lawn Farm	17	Woolpit	Ipswich Policy Area
	SS1032	Land south of Gun Cotton Way	11	Stowmarket	Core Village
Allocated sites	N/A	N/A	N/A	N/A	Core Village
Reasonable alternatives	SS0327	Land at Hill View Farm	3	Claydon	Hamlet/Countryside
	SS0328	Goldstar Transport Ltd, Elmwell Road	4	Woolpit	Core Village
	SS0330	Land at Grove Lane	14	Elmwell	Hamlet/Countryside
	SS0782	Land north of New Haughley Street	5	Wetherden	Ipswich Policy Area
	SS0787	Land south of A14	4	Woolpit	Hinterland Village
	SS0791	Land west of Tostock Road and south of A14	9	Drinkstone	Ipswich Policy Area
	SS0916	Land to the west of A14	4	Claydon	Ipswich Policy Area
	SS0924	Land south of New Road and north of A14	1	Tostock	Urban Area/Market Town
	SS0926	Land west of Old Ipswich Road	1	Claydon	Urban Area/Market Town
	SS0937	Land east of Bramford Road / B1067	11	Bramford	Core Village
	SS1033	Council Offices	1	Needham Market	Core Village
	SS1034	Council Offices Car Park	1	Needham Market	Core Village
	SS1154	Land to the south of the A14	3	Woolpit	Urban Area/Market Town
	SS1156	Land south of Old Stowmarket Road	30	Woolpit	Urban Area/Market Town
	SS1158	Land south-west of Wood Road	2	Woolpit	Urban Areas/Market Town
	SS1282	Land off Gipping Way	1	Stowmarket	Ipswich Policy Area
SS1286	Land Opposite Linnet Drive	3	Stowmarket	Core Village	

Significant negative effect (--)					
	SS1287	Land East of Tomo Business Park	0	Stowmarket	Core Village

**6.141** The reasonable alternatives receive more significant negative effects against SA Objective 6 (To maintain and where possible improve air quality and reduce noise pollution) when compared to the allocated sites that are committed and the allocated sites that are not yet committed. However, it is important to note that there are more reasonable alternatives than allocated sites that are committed and allocated sites that are not yet committed altogether.

**6.142** These sites score a significant negative effect in relation to this objective because they tend to be located within 12.5km of an AQMA. Therefore, it is likely that development at these sites could result in adverse effects on the Sudbury AQMA present within Babergh District, in addition to AQMAs in surrounding districts, most notably Ipswich and in and close to Bury St Edmunds. Some of the sites also scored a significant negative effect against this objective because they fall within 400m of a Site Safeguard Area of a water recycling centre.

#### Possible mitigation

**6.143** Mitigation of air pollution is best achieved by providing access to employment sites by more sustainable modes of transport, such as walking and cycling and the provision of public transport services. However, these factors are more likely to be taken into account in site selection, rather than provided by individual sites, unless the site is of a large scale. However, harmful vehicle emissions are being reduced on an ongoing basis through a combination of regulations, engine technology, and a switch to less polluting fuels. It is likely that, towards the end of the Plan period, electric cars will form a much greater proportion of cars on the road, helping to reduce air pollution further.

**6.144** Mitigation against odour from water recycling centre is most easily achieved at the water recycling centre itself, although there may be limits to how easily this can be made any better than current conditions.

**SA Objective 7: To conserve soil and mineral resources**

**Significant positive effects**

Significant positive effect (++)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	SS0721	Land south of Lavenham Road	50	Sproughton	Ipswich Policy Area
Reasonable alternative	SS1144	Land south of Lavenham Road	1	Brent Eleigh	Hamlets and Countryside
Mid Suffolk District					
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	N/A	N/A	N/A	N/A	N/A
Reasonable alternatives	SS0333	Land at Tower Farm	3	Mendlesham	Core Village
	SS0655	Land to the east of Tannery Road	38	Combs	Hinterland Village
	SS1033	Council Offices	1	Needham Market	Urban Area/Market Town
	SS1034	Council Offices Car Park	1	Needham Market	Urban Area/Market Town
	SS1286	Land Opposite Linnet Drive	3	Stowmarket	Urban Area/Market Town
	SS1287	Land East of Tomo Business Park	0	Stowmarket	Urban Area/Market Town

**6.145** In Babergh District, one allocated site that is not yet committed, and one reasonable alternative, receive a significant positive effect against SA Objective 7 (To conserve

soil and mineral resources). In Mid Suffolk District, it is only reasonable alternatives that receive a significant positive effect against this objective. This is due to the fact these sites

comprise brownfield land and therefore make efficient use of land.

### Significant negative effects

Significant negative effect (--)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	N/A	N/A	N/A	N/A	N/A
Reasonable alternative	SS0227	Land between London Road and A12	1	Copdock and Washbrook	Ipswich Policy Area
	SS0811	Land to the north of Springlands Way (A134)	0	Long Melford	Urban Area/Market Town
	SS0918	Land east of London Road	30	Copdock and Washbrook	Ipswich Policy Area
	SS0919	Lane west of London Road and south of Folly Lane	7	Copdock and Washbrook	Ipswich Policy Area
	SS0934	Land east of High Street & Harefield Rd and west of A134	15	Long Melford	Core Village
	SS0942	Land north of Newton Road / A134	11	Chilton	Core Village
	SS0944	Land north of Elm lane	9	Copdock and Washbrook	Ipswich Policy Area
	SS1027	Land north of The Street	3	Wherstead	Ipswich Policy Area
	SS1260	Land south east of A12	12	Copdock	Ipswich Policy Area
SS1273	Park Farm Barns and land west of Vicarage Land	10	Wherstead	Ipswich Policy Area	
Mid Suffolk District					
Allocated sites that are committed	SS0773	Lawn Farm	17	Woolpit	Core Village
	SS1032	Land south of Gun Cotton Way	11	Stowmarket	Urban Area/Market Town

Significant negative effect (--)					
Allocated sites	N/A	N/A	N/A	N/A	N/A
Reasonable alternatives	SS0436	Land south-west of Needham Road	12	Stowmarket	Urban Area/Market Town
	SS0792	Land north of A1120 and east of Church Lane	5	Stonham Earl	Hinterland Village

**6.146** In Babergh District, more reasonable alternatives are expected to have a significant negative effect against SA Objective 7 (To conserve soil and mineral resources). In Mid Suffolk District, an equal number of allocated sites that are committed and reasonable alternative sites are expected to have a significant negative effect against this objective. This is due to the fact a significant proportion of these sites fall on Grade 1 or 2 agricultural land (the Best and Most Versatile Agricultural Land). A small number of these sites also fall within 250m of an existing, planned or potential site allocated in the Suffolk Minerals and Waste Local Plan for sand and gravel extraction (SS0227, SS0918, SS0919 and SS1260).

#### Possible mitigation

**6.147** With respect to soils, it is difficult to mitigate the loss of Best and Most Versatile Agricultural Land, which will be lost permanently by development.

**6.148** With respect to mineral resources, it may be possible to extract the mineral resource prior to development and, in some instances, to use the resource on site as part of the development itself.

**SA Objective 9: To reduce contribution to climate change**

**Significant positive effects**

Significant positive effect (++)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	SS0721	Sproughton Enterprise Park / Former Sugar Beet Factory Site	50	Sproughton	Ipswich Policy Area
Reasonable alternative	SS0942	Land north of Newton Road / A134	11	Chilton	Core Village
Mid Suffolk District					
Allocated sites that are committed	SS1032	Land south of Gun Cotton Way	11	Stowmarket	Urban Area/Market Town
Allocated sites	SS1223 <sup>43</sup>	Land at Mill Lane	79	Stowmarket	Ipswich Policy Area
Reasonable alternatives	SS0324	Land north of Spikes Lane	1	Stowmarket	Urban Area/Market Town
	SS0436	Land south-west of Needham Road	12	Stowmarket	Urban Area/Market Town
	SS1033	Council Offices	1	Needham Market	Urban Area/Market Town
	SS1034	Council Offices Car Park	1	Needham Market	Urban Area/Market Town
	SS1282	Land off Gipping Way	1	Stowmarket	Urban Area/Market Town
	SS1286	Land Opposite Linnet Drive	3	Stowmarket	Urban Area/Market Town
	SS1287	Land East of Tomo Business Park	0	Stowmarket	Urban Area/Market Town

<sup>43</sup> Site SS1223 was allocated in the Stowmarket Area Action Plan (2013).

**6.149** In Babergh District, one allocated site that is not yet committed, and one reasonable alternative, receive a significant positive effect against SA Objective 9 (To reduce contribution to climate change). In Mid Suffolk District, a higher number of reasonable alternatives than allocated sites that are committed and allocated sites that are not yet

committed, receive a significant positive effect against this objective. These sites are expected to have a significant positive effect against this objective because they perform strongly against related criteria: 3b (Settlement hierarchy); 16a (Rail); 16b (Bus); and 16c (Cycling).

### Significant negative effects

Significant negative effect (--)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	N/A	N/A	N/A	N/A	N/A
Reasonable alternative	SS1144	Land south of Lavenham Road	1	Brent Eleigh	Hamlet/Countryside
Mid Suffolk District					
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	N/A	N/A	N/A	N/A	N/A
Reasonable alternatives	SS0333	Land at Tower Farm	3	Mendlesham	Core Village
	SS0536	Land east of Norwich Road	17	Wetheringsett-cum-Brockford	Core Village

**6.150** Only reasonable alternatives receive a significant negative effect against SA Objective 7 (To conserve soil and mineral resources). These sites are expected to have a significant negative effect against this objective because they perform poorly against related criteria: 3b (Settlement hierarchy); 16a (Rail); 16b (Bus); and 16c (Cycling).

**6.151** It should be noted that most of these sites are small scale, with the exception of site SS0536 (Land east of Norwich Road, Mendlesham).

#### **Possible mitigation**

**6.152** Greenhouse gas emissions from vehicles can be mitigated by providing opportunities to use alternative, more sustainable modes of transport, such as walking, cycling and public transport. This can be achieved through site design and layout, and by delivering services and facilities on site, or introducing public transport services, particularly buses.

**6.153** However, given the small scale of most these sites, it is considered that such opportunities for mitigation will be limited.

**SA Objective 10: To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change**

**Significant positive effects**

**6.154** Under the site appraisal methodology, it is not possible for any site to score a significant positive effect against SA Objective 10 (To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change) because in general development will not have beneficial effects on climate change adaption, particularly flood risk.

**Significant negative effects**

Significant negative effect (--)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	N/A	N/A	N/A	N/A	N/A
Reasonable alternative	SS0227	Land between London Road and A12	1	Copdock and Washbrook	Ipswich Policy Area
	SS0918	Land east of London Road	30	Copdock and Washbrook	Ipswich Policy Area
	SS0919	Lane west of London Road and south of Folly Lane	7	Copdock and Washbrook	Ipswich Policy Area
	SS1178*	Land north of Sproughton Road	40	Sproughton	Ipswich Policy Area
	SS1225	Land West of Bull Lane	3	Acton	Hamlet/Countryside
	SS1260	Land south east of A12	12	Copdock	Ipswich Policy Area
Mid Suffolk District					
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A

Significant negative effect (--)					
Allocated sites	SS0928	Land at Eye Airfield	10	Eye	Urban Area/Market Town
	SS1223 <sup>44</sup>	Land at Mill Lane	79	Stowmarket	Ipswich Policy Area
Reasonable alternatives	SS0324	Land north of Spikes Lane	1	Stowmarket	Urban Area/Market Town
	SS0330	Land at Grove Lane	14	Elmswell	Core Village
	SS0333	Land at Tower Farm	3	Mendlesham	Core Village
	SS0655	Land to the east of Tannery Road	38	Combs	Hinterland Village
	SS0916	Land to the west of A14	4	Claydon	Ipswich Policy Area
	SS1154	Land to the south of the A14	3	Woolpit	Core Village
	SS1156	Land south of Old Stowmarket Road	30	Woolpit	Core Village
	SS1282	Land off Gipping Way	1	Stowmarket	Urban Area/Market Town

\*denotes that effect is recorded as uncertain

**6.155** In Babergh District, only reasonable alternatives receive a significant negative effect against SA Objective 10 (To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change).

**6.156** In Mid Suffolk District, a higher number of reasonable alternatives than allocated sites receive a significant negative effect against this objective. All of these sites, with the exception of SS0324 (Land north of Sikes Lane, Stowmarket), are expected to have a significant negative effect against this objective because they contain land with a 1 in 30 year risk of surface water flooding. Site SS0324 is expected to have a significant negative effect because it falls within Flood Zone 3. Sites SS0227 (Land between London Road and A12) and SS0919 (Lane west of London Road and south of Folly Lane) fall within Flood Zone 3, in addition to containing land with a 1 in 30 year risk of surface water flooding.

**6.157** BMSDC's Strategic Flood Risk Assessment (SFRA) lists any sites in the JLP area that are at risk of the following types of flooding: fluvial, tidal, surface water, groundwater, sewers and reservoir inundation. According to the SFRA, the most significant sources of flooding are fluvial and surface water.

**6.158** The employment sites identified in the SFRA as being at risk of fluvial flooding are: SS0227 (Land between London Road and A12, Copdock and Washbrook); SS1282 (Land off Gipping Way, Stowmarket Site D); SS0919 (Lane west of London Road and south of Folly Lane, Copdock and Washbrook); SS0324 (Land north of Spikes Lane, Stowmarket); SS0916 (Land to the west of A14, Claydon);

SS1154 (Land to the south of the A14, Woolpit); SS1260 (Land south east of A12, Copdock); SS1178 (Land north of Sproughton Road, Sproughton); and SS1223 (Land at Mill Lane, Stowmarket). All of these sites are listed in the above table as having a significant negative effect against SA Objective 10.

**6.159** The SFRA identified the following sites as being at risk of surface water flooding: SS1154 (Land to the south of the A14, Woolpit); SS0655 (Land to the east of Tannery Road, Combs); SS0227 (Land between London Road and A12, Copdock and Washbrook); SS1225 (Land West of Bull Lane, Acton Industrial Estate); SS0919 (Lane west of London Road and south of Folly Lane, Copdock and Washbrook); and SS0916 (Land to the west of A14, Claydon). All of these sites are listed in the above table as having a significant negative effect against SA Objective 10.

**6.160** With regard to groundwater flooding, the SFRA identified the following sites as being at risk: SS0916 (Land to the west of A14, Claydon); SS1154 (Land to the south of the A14, Woolpit); SS1092 (Land south of Stone Street, Hadleigh); and SS1178 (Land north of Sproughton Road, Sproughton). The SFRA did not identify any employment sites as being at risk of tidal flooding. Sewer and reservoir inundation data were not provided in a format to screen against the sites in the SFRA.

#### Possible mitigation

**6.161** Sites that have a greater risk of fluvial flooding from overflowing rivers can be protected from flooding by flood

<sup>44</sup> Site SS1223 was allocated in the Stowmarket Area Action Plan (2013),

defences, and the areas of land at most risk from flooding on a site can be protected from development. In addition, surface water flooding can be mitigated through the use of sustainable drainage systems.

**6.162** It should be noted that the 'policy-off' SA used nationally available datasets on flood risk. A separate Strategic Flood Risk Assessment has been undertaken on behalf of BMSDC, which has provided more detailed assessment of specific sites in the two Districts, which has helped to inform site selection and mitigation measures.

## SA Objective 11: To conserve and enhance biodiversity and geodiversity

### Significant positive effects

**6.163** Under the site appraisal methodology, it is not possible for any site to score a significant positive effect against SA Objective 11 (To conserve and enhance biodiversity and geodiversity).

**6.164** It is recognised that some sites may provide greater opportunities for biodiversity enhancement than others, but this information was not available on a consistent basis for all sites. In any event, the NPPF requires biodiversity net gain to be achieved in all development.

**6.165** The primary focus of the site appraisals was therefore on the prevention of harm to biodiversity assets. It should be noted that this is not a straightforward process. The internationally and nationally designated sites represent the most 'valuable' biodiversity assets, but locally designated sites

are also important. Similarly, priority habitats play an important role in maintaining and supporting biodiversity in general. Therefore, given the importance of ecological networks and mosaics of habitats in supporting biodiversity, all such designations were given considerable weight in the site appraisals. Apart from designated sites, Impact Risk Zones defined for Sites of Special Scientific Interest (SSSIs) by Natural England were taken into account. It should be noted that the categories of use that could fall within 'employment uses' under Impact Risk Zones are wide ranging, and so a precautionary approach was adopted. Similarly, buffer zones were delineated for other designated sites and priority habitats to recognise that development close to them could also harm their biodiversity interest.

### Significant negative effects<sup>45</sup>

Significant negative but uncertain effect (–?)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	SS0721	Sproughton Enterprise Park / Former Sugar Beet Factory Site	50	Sproughton	Ipswich Policy Area
	SS1035	Land to the east of Frog Hall Lane	6	Hadleigh	Urban Area/Market Town
Reasonable alternative	SS0227	Land between London Road and A12	1	Copdock and Washbrook	Ipswich Policy Area
	SS0726	Land to the south of Corn Hatches Lane	7	Elmsett	Hinterland Village
	SS0811	Land to the north of Springlands Way (A134)	0	Long Melford	Urban Area/Market Town
	SS0918	Land east of London Road	30	Copdock and Washbrook	Ipswich Policy Area
	SS0919	Lane west of London Road and south of Folly Lane	7	Copdock and Washbrook	Ipswich Policy Area
	SS0934	Land east of High Street & Harefield Rd and west of A134	15	Long Melford	Core Village
	SS0942	Land north of Newton Road / A134	11	Chilton	Core Village

<sup>45</sup> All significant effects against this objective are recorded as uncertain depending on whether they can be mitigated or not.

Significant negative but uncertain effect (--?)					
	SS0944	Land north of Elm lane	9	Copdock and Washbrook	Ipswich Policy Area
	SS0945	Land south of Mill Lane and west of London Road	20	Copdock and Washbrook	Ipswich Policy Area
	SS0948	The Hollies, Chilton Airfield	8	Chilton	Hinterland Village
	SS1027	Land north of The Street	3	Wherstead	Ipswich Policy Area
	SS1031	Land south of Ipswich Road	5	Hadleigh	Urban Area/Market Town
	SS1092	Land south of Stone Street	0	Hadleigh	Urban Area/Market Town
	SS1144	Land south of Lavenham Road	1	Brent Eleigh	Hamlet/Countryside
	SS1168	Land west of the A137	11	Wherstead	Ipswich Policy Area
	SS1178	Land north of Sproughton Road	40	Sproughton	Ipswich Policy Area
	SS1225	Land West of Bull Lane, Acton Industrial Estate	3	Acton	Hamlets/Countryside
	SS1260	Land south east of A12	12	Copdock	Ipswich Policy Area
	SS1273	Park Farm Barns and land west of Vicarage Land	10	Wherstead	Ipswich Policy Area
Mid Suffolk District					
Allocated sites that are committed	SS0773	Lawn Farm	17	Woolpit	Core Village
	SS1032	Land south of Gun Cotton Way	11	Stowmarket	Urban Area/Market Town
Allocated sites	SS0928	Land at Eye Airfield	10	Eye	Urban Area/Market Town
	SS1223 <sup>46</sup>	Eye	79	Stowmarket	Ipswich Policy Area
Reasonable alternatives	SS0324	Land north of Spikes Lane	1	Stowmarket	Urban Area/Market Town
	SS0325	Land at Mendlesham Airfield	70	Mendlesham	Core Village
	SS0327	Land at Hill View Farm	3	Claydon	Ipswich Policy Area
	SS0328	Goldstar Transport Ltd, Elmswell Road	4	Woolpit	Core Village
	SS0330	Land at Grove Lane	14	Elmswell	Core Village
	SS0333	Land at Tower Farm	3	Mendlesham	Core Village
	SS0436	Land south-west of Needham Road	12	Stowmarket	Urban Area/Market Town
	SS0536	Land east of Norwich Road	17	Wetheringsett-cum-Brockford	Core Village

<sup>46</sup> Site SS1223 was allocated in the Stowmarket Area Action Plan (2013).

Significant negative but uncertain effect (--?)					
SS0655	Land to the east of Tannery Road	38	Combs	Hinterland Village	
SS0782	Land north of New Haughley Street	5	Wetherden	Hamlet/Countryside	
SS0787	Land south of A14	4	Woolpit	Core Village	
SS0791	Land west of Tostock Road and south of A14	9	Drinkstone	Hamlet/Countryside	
SS0792	Land north of A1120 and east of Church Lane	5	Stonham Earl	Hinterland Village	
SS0916	Land to the west of A14	4	Claydon	Ipswich Policy Area	
SS0924	Land south of New Road and north of A14	1	Tostock	Hinterland Village	
SS0926	Land west of Old Ipswich Road	1	Claydon	Ipswich Policy Area	
SS0930	Land north-east of Tot Hill	1	Stowmarket	Urban Area/Market Towns	
SS0937	Land east of Bramford Road / B1067	11	Bramford	Ipswich Policy Area	
SS0939	Land east of Rectory Hill and south of The Street	17	Botesdale & Rickinghall	Core Village	
SS1033	Council Offices	1	Needham Market	Urban Area/Market Town	
SS1034	Council Offices Car Park	1	Needham Market	Urban Area/Market Town	
SS1154	Land to the south of the A14	3	Woolpit	Core Village	
SS1156	Land south of Old Stowmarket Road	30	Woolpit	Core Village	
SS1158	Land south-west of Wood Road	2	Woolpit	Core Village	
SS1249	Land south of Mill Road	0	Botesdale	Core Village	
SS1282	Land off Gipping Way	1	Stowmarket	Urban Area/Market Town	
SS1286	Land Opposite Linnet Drive	3	Stowmarket	Urban Area/Market Town	
SS1287	Land East of Tomo Business Park	0	Stowmarket	Urban Area/Market Town	

**6.166** A high number of reasonable alternatives receive a significant negative but uncertain effect against SA Objective 11 (To conserve and enhance biodiversity and geodiversity). However, it is important to note that there are more reasonable alternatives than allocated sites that are committed and allocated sites that are not yet committed altogether.

**6.167** In Babergh District, three allocated sites are expected to have a significant negative but uncertain effect against this objective (SS0721, SS1027 and SS1035). In Mid Suffolk District, two allocated sites that are committed (SS0773 and SS1032) and two allocated sites that are not yet committed (SS0928 and SS1223), are expected to have a significant negative effect against this objective.

**6.168** All employment sites are expected to have a significant negative effect against this objective because 25% or more of their land falls within the 'Air pollution' SSSI Impact Risk Zone. Although it is not yet known what employment uses will be provided at each site, a precautionary approach was taken. Therefore, any development that could cause air pollution or dust either in its construction or operation, was given a significant negative effect. A small number of these employment sites also fall within the 'All consultations' SSSI Impact Risk Zone and are therefore located within the vicinity of a SSSI. These sites are: SS0327 (Land at Hill View Farm); SS0721 (Sproughton Enterprise Park / Former Sugar Beet Factory Site); SS0916 (Land to the west of A14); SS0926 (Land west of Old Ipswich Road); SS0937 (Land east of Bramford Road / B1067); and SS1178 (Land north of

Sproughton Road). However, no sites fall within (or contain) a SSSI.

**6.169** With regard to the 'Water supply' SSSI Impact Risk Zone, 25% or more of the land within the following 26 employment sites fall within this Zone: SS0325 (Land at Mendlesham Airfield, Mendlesham); SS0328 (Goldstar Transport Ltd, Elmswell Road, Woolpit); SS0436 (Land south-west of Needham Road, Stowmarket); SS0536 (Land east of Norwich Road, Mendlesham); SS0655 (Land to the east of Tannery Road, Combs); SS0787 (Land south of A14, Woolpit); SS0792 (Land north of A1120 and east of Church Lane, Stonham Earl); SS0916 (Land to the west of A14, Claydon); SS0924 (Land south of New Road and north of A14, Tostock); SS0934 (Land east of High Street & Harefield Rd and west of A134, Long Melford); SS0939 (Land east of Rectory Hill and south of The Street, Rickinghall); SS1027 (Land north of The Street, Wherstead); SS1031 (Land south of Ipswich Road, Hadleigh); SS1032 (Land south of Gun Cotton Way, Stowmarket); SS1033 (Council Offices, Needham Market); SS1034 (Council Offices Car Park, Needham Market); SS1035 (Land to the east of Frog Hall Lane, Hadleigh); SS1144 (Land south of Lavenham Road, Brent Eleigh); SS1154 (Land to the south of the A14, Woolpit); SS1168 (Land west of the A137, Wherstead); SS1223 (Land at Mill Lane, Stowmarket); SS1225 (Land West of Bull Lane, Acton Industrial Estate); SS1273 (Park Farm Barns and land west of Vicarage Land, Wherstead); SS1282 (Land off Gipping Way, Stowmarket Site D); SS1286 (Land Opposite Linnet Drive, Stowmarket); and SS1287 (Land East of Tomo Business Park, Stowmarket).

**6.170** In addition to the above, a large number of employment sites contain or are located within 250m of a Local Nature Reserve or County Wildlife Site and/or contain or fall within 100m of a priority habitat or ancient woodland. Seven sites overlap a County Wildlife Site: SS0324 (Land north of Spikes Lane, Stowmarket); SS0330 (Land at Grove Lane, Elmswell); SS0787 (Land south of A14, Woolpit); SS0948 (The Hollies, Chilton Airfield); SS1178 (Land north of Sproughton Road, Sproughton); SS1223 (Land at Mill Lane, Stowmarket); and SS1260 (Land south east of A12, Copdock). Most of these sites overlap a County Wildlife Site by less than 1%. However, SS0330 overlaps a County Wildlife Site by just over 5%, closely followed by site SS1260 which overlaps a County Wildlife Site by just over 3%. Sites SS0787 and SS0948 overlap a County Wildlife Site by just over 1%.

**6.171** Four of the sites overlap an area of Ancient Woodland: SS0330 (Land at Grove Lane, Elmswell); SS0787 (Land south of A14, Woolpit); SS1178 (Land north of Sproughton Road, Sproughton); and SS1260 (Land south east of A12, Copdock). SS0787 overlaps an area of Ancient Woodland by 4%, whilst the remaining three sites overlap an area of Ancient Woodland by less than 1%.

**6.172** With regard to Priority Habitats, 15 of the sites listed in the table above overlap with a Priority Habitat. Some of these sites overlap a Priority Habitat by less than 1% because they are located directly adjacent to one. These sites are: SS0324 (Land north of Spikes Lane, Stowmarket); SS0773 (Lawn Farm, Woolpit); SS0787 (Land south of A14, Woolpit); SS0918 (Land east of London Road, Copdock and Washbrook); SS1144 (Land south of Lavenham Road, Brent Eleigh); SS1178 (Land north of Sproughton Road, Sproughton); and SS1260 (Land south east of A12, Copdock). Similarly, sites SS1223 (Land at Mill Lane, Stowmarket) and SS0721 (Sproughton Enterprise Park / Former Sugar Beet Factory Site, Sproughton) overlap a Priority Habitat by just over 1%, whilst site SS1032 overlaps a Priority Habitat by 2.5% and SS1156 (Sproughton Enterprise Park / Former Sugar Beet Factory Site, Sproughton) by 4.4%. However, site SS1282 (Land off Gipping Way, Stowmarket Site D) comprises a deciduous woodland priority habitat, whilst Site SS0930 (Land north-east of Tot Hill, Stowmarket) contains just under 60% of a deciduous woodland priority habitat. Site SS1225 (Land West of Bull Lane, Acton Industrial Estate) contains around 22% of a priority habitat where no main habitats are present but there are additional habitats in existence there, whilst SS0782 (Land north of New Haughley Street, Wetherden) contains around 10% of additional habitats. In addition, site SS1225 contains around 22% a deciduous woodland priority habitat.

#### Possible mitigation

**6.173** It is important to note that the above assessment of sites is prior to mitigation, and in many instances the potential risk of significant effects could be reduced by the end use of the site concerned.

**6.174** There are, nonetheless, many opportunities to provide mitigation. These can include avoiding development of the most sensitive parts of the site and including buffer zones, planting or erecting barriers or buffers to prevent disturbance, creation or improvement of habitats particularly where the existing biodiversity interest is low, including within development new ecological links, such as hedgerows and wetlands (for example, through sustainable drainage systems) that link habitats where currently there are gaps, the incorporation of artificial nesting and roosting boxes and areas, and so on.

**6.175** However, avoidance of harm to existing habitats and biodiversity interest should be the priority in the first instance, which is why the above overlaps with designated sites and priority habitats have been highlighted.

**SA Objective 12: To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings**

**Significant positive effects**

**6.176** Under the site appraisal methodology, it is not possible for any site to score a significant positive effect against SA Objective 12 (To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings).

**6.177** In practice, there may be instances where new development can actually improve the setting of historic assets or bring heritage assets at risk back into beneficial use. The site appraisals have been guided by a separate Heritage Impact Assessment undertaken by LUC.

**Significant negative effects**

Significant negative effect (--)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	N/A	N/A	N/A	N/A	N/A
Reasonable alternative	SS0934*	Land east of High Street & Harefield Rd and west of A134	15	Long Melford	Core Village
	SS0944*	Land north of Elm lane	9	Copdock and Washbrook	Ipswich Policy Area
	SS0945*	Land south of Mill Lane and west of London Road	20	Copdock and Washbrook	Ipswich Policy Area
	SS1027*	Land north of The Street	3	Wherstead	Ipswich Policy Area
	SS1178*	Land north of Sproughton Road	40	Sproughton	Ipswich Policy Area
	SS1273*	Park Farm Barns and land west of Vicarage Land	10	Wherstead	Ipswich Policy Area
Mid Suffolk District					
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A

Significant negative effect (--)					
Allocated sites	SS1223* <sup>47</sup>	Land at Mill Lane	79	Stowmarket	Ipswich Policy Area
Reasonable alternatives	SS0655	Land to the east of Tannery Road	38	Combs	Hinterland Village
	SS0937*	Land east of Bramford Road / B1067	11	Bramford	Ipswich Policy Area
	SS0939*	Land east of Rectory Hill and south of The Street	17	Botesdale & Rickinghall	Core Villages
	SS1033*	Council Offices	1	Needham Market	Urban Areas and Market Towns
	SS1249*	Land south of Mill Road	0	Botesdale	Core Villages

\*denotes that effect is recorded as uncertain

**6.178** More reasonable alternatives than allocated sites that are committed, and allocated sites that are not yet committed, receive a significant negative effect against SA Objective 12 (To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings). However, it is important to note that there are more reasonable alternatives overall.

**6.179** The employment sites listed in the above table are all expected to have a significant negative effect against this objective because the significance of their known heritage assets (designated or otherwise) and historic landscape character are considered high and development is therefore likely to have an adverse physical impact on these assets. These sites are also likely to be very sensitive to setting change.

#### Possible mitigation

**6.180** Mitigation of potential significant negative effects may be achievable by site layout and design, choice of materials, etc. This can help to avoid the most sensitive locations, views and vistas. However, on some sites there may be limited opportunity to achieve this.

<sup>47</sup> Site SS1223 was allocated in the Stowmarket Area Action Plan (2013).

### SA Objective 13: To conserve and enhance the quality and local distinctiveness of landscapes and townscapes

#### Significant positive effects

**6.181** None of the sites are expected to have a significant positive effect against SA Objective 13 (To conserve and enhance the quality and local distinctiveness of landscapes and townscapes).

#### Significant negative effects

Significant negative effect (--)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	SS1035	Land to the east of Frog Hall Lane	6	Hadleigh	Urban Area/Market Town
Reasonable alternative	SS0811	Land to the north of Springlands Way (A134)	0	Long Melford	Urban Area/Market Town
	SS0918	Land east of London Road	30	Copdock and Washbrook	Ipswich Policy Area
	SS0934	Land east of High Street & Harefield Rd and west of A134	15	Long Melford	Core Village
	SS0944	Land north of Elm lane	9	Copdock and Washbrook	Ipswich Policy Area
	SS0945	Land south of Mill Lane and west of London Road	20	Copdock and Washbrook	Ipswich Policy Area
	SS0948	The Hollies, Chilton Airfield	8	Chilton	Hinterland Village
	SS1031	Land south of Ipswich Road	5	Hadleigh	Urban Area/Market Town
	SS1178	Land north of Sproughton Road	40	Sproughton	Ipswich Policy Area
Mid Suffolk District					
Allocated sites that are committed	SS0773	Lawn Farm	17	Woolpit	Core Village

Significant negative effect (--)					
Allocated sites	N/A	N/A	N/A	N/A	N/A
Reasonable alternatives	SS0782	Land north of New Haughley Street	5	Wetherden	Hamlet/Countryside
	SS0939	Land east of Rectory Hill and south of The Street	17	Botesdale & Rickinghall	Core Village
	SS1156	Land south of Old Stowmarket Road	30	Woolpit	Core Village
	SS1158	Land south-west of Wood Road	2	Woolpit	Core Village
	SS1249	Land south of Mill Road	0	Botesdale	Core Village

**6.182** More reasonable alternatives than allocated sites that are committed and allocated sites that are not yet committed are expected to have a significant negative effect against SA Objective 13 (To conserve and where enhance the quality and local distinctiveness of landscapes and townscapes). However, it is important to note that there are more reasonable alternatives overall. These sites also score a significant negative effect because they have high sensitivity in that development would be very likely to give rise to significant adverse landscape and/or visual effects.

**Possible mitigation**

**6.183** Mitigation may be possible through the design and layout of development and the choice of materials. In some instances, it may not be possible to mitigate against the significant negative effects in full due to the inherent landscape sensitivity of the site.

**SA Objective 14: To achieve sustainable levels of prosperity and economic growth throughout the plan area**

**Significant positive effects**

Significant positive effect (++)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	SS0721	Sproughton Enterprise Park / Former Sugar Beet Factory Site	50	Sproughton	Ipswich Policy Area
	SS1035	Land to the east of Frog Hall Lane	6	Hadleigh	Urban Area/Market Town
Reasonable alternative	SS0726	Land to the south of Corn Hatches Lane	7	Elmsett	Hinterland Village
	SS0811	Land to the north of Springlands Way (A134)	0	Long Melford	Urban Area/Market Town
	SS0918	Land east of London Road	30	Copdock and Washbrook	Ipswich Policy Area
	SS0919	Lane west of London Road and south of Folly Lane	7	Copdock and Washbrook	Ipswich Policy Area
	SS0934	Land east of High Street & Harefield Rd and west of A134	15	Long Melford	Core Village
	SS0942	Land north of Newton Road / A134	11	Chilton	Core Village
	SS0945	Land south of Mill Lane and west of London Road	20	Copdock and Washbrook	Ipswich Policy Area
	SS0948	The Hollies, Chilton Airfield	8	Chilton	Hinterland Village
	SS1031	Land south of Ipswich Road	5	Hadleigh	Urban Area/Market Town
	SS1168	Land west of the A137	11	Wherstead	Ipswich Policy Area
	SS1178	Land north of Sproughton Road	40	Sproughton	Ipswich Policy Area
	SS1260	Land south east of A12	12	Copdock	Ipswich Policy Area
SS1273	Park Farm Barns and land west of Vicarage Land	10	Wherstead	Ipswich Policy Area	
Mid Suffolk District					

Significant positive effect (++)					
Allocated sites that are committed	SS0773	Lawn Farm	17	Woolpit	Core Village
Allocated sites	SS0928	Land at Eye Airfield	10	Eye	Urban Area/Market Town
	SS1223 <sup>48</sup>	Land at Mill Lane	79	Stowmarket	Ipswich Policy Area
Reasonable alternatives	SS0325	Land at Mendlesham Airfield	70	Mendlesham	Core Village
	SS0330	Land at Grove Lane	14	Elmswell	Core Village
	SS0333	Land at Tower Farm	3	Mendlesham	Core Village
	SS0436	Land south-west of Needham Road	12	Stowmarket	Urban Area/Market Town
	SS0536	Land east of Norwich Road	17	Wetheringsett-cum-Brockford	Core Village
	SS0655	Land to the east of Tannery Road	38	Combs	Hinterland Village
	SS0782	Land north of New Haughley Street	5	Wetherden	Hamlet/Countryside
	SS0791	Land west of Tostock Road and south of A14	9	Drinkstone	Hamlet/Countryside
	SS0792	Land north of A1120 and east of Church Lane	5	Stonham Earl	Hinterland Village
	SS0937	Land east of Bramford Road / B1067	11	Bramford	Ipswich Policy Area
	SS0939	Land east of Rectory Hill and south of The Street	17	Botesdale & Rickinghall	Core Village
	SS1156	Land south of Old Stowmarket Road	30	Woolpit	Core Village
SS1249	Land south of Mill Road	0	Botesdale	Core Village	

**6.184** The sites listed in the table above are all expected to have a significant positive effect against SA Objective 14 (To achieve sustainable levels of prosperity and economic growth throughout the plan area) because they are all over 5ha in size and will therefore provide a significant number of employment opportunities (criterion 14b: Employment sites). One of the sites, SS0937 (Land east of Bramford Road / B1067), also performs strongly against criterion 14a (Employment deprivation) because it is located within one of the 20% most deprived areas with regard to the Employment Deprivation domain of the English Indices of Deprivation, and

therefore offers potential for regeneration in an area with few employment opportunities.

#### Significant negative effects

**6.185** None of the employment sites will result in a significant negative effect against SA Objective 14 (To achieve sustainable levels of prosperity and economic growth throughout the plan area) because they provide employment opportunities.

<sup>48</sup> Site SS1223 was allocated in the Stowmarket Area Action Plan (2013).

**Possible mitigation**

**6.186** No mitigation is required because no sites will have a significant negative effect.

**SA Objective 15: To revitalise the Districts' town centres**

**Significant positive effects**

Significant positive effect (++)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	N/A	N/A	N/A	N/A	N/A
Reasonable alternative	N/A	N/A	N/A	N/A	N/A
Mid Suffolk District					
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	N/A	N/A	N/A	N/A	N/A
Reasonable alternatives	SS1033	Council Offices	1	Needham Market	Urban Area/Market Town
	SS1034	Council Offices Car Park	1	Needham Market	Urban Area/Market Town

**6.187** The assessment criteria for this SA Objective is tightly confined to walking distances. As a result, only two sites, both of which are reasonable alternatives, are expected to have a significant positive effect against SA Objective 15 (To

revitalise the Districts' town centres). This is due to the fact they are both located within 400m of a Town Centre, being Needham Market.

Significant negative effects

Significant negative effect (-)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	SS0721	Sproughton Enterprise Park / Former Sugar Beet Factory Site	50	Sproughton	Ipswich Policy Area
Reasonable alternative	SS0227	Land between London Road and A12	1	Copdock and Washbrook	Ipswich Policy Area
	SS0726	Land to the south of Corn Hatches Lane	7	Elmsett	Hinterland Village
	SS0811	Land to the north of Springlands Way (A134)	0	Long Melford	Urban Area/Market Town
	SS0918	Land east of London Road	30	Copdock and Washbrook	Ipswich Policy Area
	SS0919	Lane west of London Road and south of Folly Lane	7	Copdock and Washbrook	Ipswich Policy Area
	SS0934	Land east of High Street & Harefield Rd and west of A134	15	Long Melford	Core Village
	SS0942	Land north of Newton Road / A134	11	Chilton	Core Village
	SS0944	Land north of Elm lane	9	Copdock and Washbrook	Ipswich Policy Area
	SS0945	Land south of Mill Lane and west of London Road	20	Copdock and Washbrook	Ipswich Policy Area
	SS0948	The Hollies, Chilton Airfield	8	Chilton	Hinterland Village
	SS1027	Land north of The Street	3	Wherstead	Ipswich Policy Area
	SS1031	Land south of Ipswich Road	5	Hadleigh	Urban Area/Market Towns
	SS1092	Land south of Stone Street	0	Hadleigh	Urban Area/Market Town
	SS1144	Land south of Lavenham Road	1	Brent Eleigh	Hamlet/Countryside
	SS1168	Land west of the A137	11	Wherstead	Ipswich Policy Area
	SS1178	Land north of Sproughton Road	40	Sproughton	Ipswich Policy Area
SS1225	Land West of Bull Lane	3	Acton	Hamlet/Countryside	
SS1260	Acton Industrial Estate	12	Copdock	Ipswich Policy Area	
SS1273	Land south east of A12	10	Wherstead	Ipswich Policy Area	
Mid Suffolk District					

Significant negative effect (--)					
Allocated sites that are committed	SS0773	Lawn Farm	17	Woolpit	Core Village
Allocated sites	SS0928	Land at Eye Airfield	10	Eye	Urban Area/Market Town
	SS1223 <sup>49</sup>	Land at Mill Lane	79	Stowmarket	Ipswich Policy Area
Reasonable alternatives	SS0324	Land north of Spikes Lane	1	Stowmarket	Urban Areas and Market Towns
	SS0325	Land at Mendlesham Airfield	70	Mendlesham	Core Villages
	SS0327	Land at Hill View Farm	3	Claydon	Ipswich Policy Area
	SS0328	Goldstar Transport Ltd, Elmswell Road	4	Woolpit	Core Villages
	SS0330	Land at Grove Lane	14	Elmswell	Core Villages
	SS0333	Land at Tower Farm	3	Mendlesham	Core Villages
	SS0436	Land south-west of Needham Road	12	Stowmarket	Urban Areas and Market Towns
	SS0536	Land east of Norwich Road	17	Wetheringsett-cum-Brockford	Core Villages
	SS0655	Land to the east of Tannery Road	38	Combs	Hinterland Villages
	SS0782	Land north of New Haughley Street	5	Wetherden	Hamlets and Countryside
	SS0787	Land south of A14	4	Woolpit	Core Villages
	SS0791	Land west of Tostock Road and south of A14	9	Drinkstone	Hamlets and Countryside
	SS0792	Land north of A1120 and east of Church Lane	5	Stonham Earl	Hinterland Villages
	SS0916	Land to the west of A14	4	Claydon	Ipswich Policy Area
	SS0924	Land south of New Road and north of A14	1	Tostock	Hinterland Villages
	SS0926	Land west of Old Ipswich Road	1	Claydon	Ipswich Policy Area
SS0930	Land north-east of Tot Hill	1	Stowmarket	Urban Areas and Market Towns	
SS0937	Land east of Bramford Road / B1067	11	Bramford	Ipswich Policy Area	
SS0939	Land east of Rectory Hill and south of The Street	17	Botesdale & Rickinghall	Core Villages	
SS1154	Land to the south of the A14	3	Woolpit	Core Villages	

<sup>49</sup> Site SS1223 was allocated in the Stowmarket Area Action Plan (2013).

Significant negative effect (-)					
	SS1156	Land south of Old Stowmarket Road	30	Woolpit	Core Villages
	SS1158	Land south-west of Wood Road	2	Woolpit	Core Villages
	SS1249	Land south of Mill Road	0	Botesdale	Core Villages

**6.188** As set out in the above table, a large number of employment sites are expected to have a significant negative effect against SA Objective 15 (To revitalise the Districts' town centres) because they are located beyond the preferred maximum walking distance to a town and/or district centre. Indeed, employment sites tend to be located on the outskirts of urban areas, around existing industrial areas.

#### Possible mitigation

**6.189** Although the site appraisal criteria have been tightly prescribed for this SA Objective, it is possible that employment development in settlements containing town and district centres, even if those employment sites are on the edge of town, for example from workers using town and district centre shops, services and facilities during lunch breaks and before and after work. However, the further away that people are from the Districts' centres, the greater the likelihood they will travel by car, and the greater the risk that they could look elsewhere to access services and facilities.

**6.190** There is not a great deal that can be done to mitigate these effects on an individual employment site basis, except by providing good public transport services to the Districts' centres. Complementary measures would also help, such as ensuring that the Districts' centres have an attractive offer enabling them to compete with other centres, but employment development outside the Districts' centres are unlikely to be able to contribute to this.

**SA Objective 16: To enable efficient patterns of movement and modal shift towards sustainable modes of transport**

**Significant positive effects**

Significant positive effect (++)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	N/A	N/A	N/A	N/A	N/A
Reasonable alternative	N/A	N/A	N/A	N/A	N/A
Mid Suffolk District					
Allocated sites that are committed	SS1032	Land south of Gun Cotton Way	11	Stowmarket	Urban Area/Market Town
Allocated sites	N/A	N/A	N/A	N/A	N/A
Reasonable alternatives	SS1033	Council Offices	1	Needham Market	Urban Area/Market Town
	SS1034	Council Offices Car Park	1	Needham Market	Urban Area/Market Town
	SS1282	Land off Gripping Way	1	Stowmarket	Urban Area/Market Town
	SS1287	Land East of Tomo Business Park	0	Stowmarket	Urban Area/Market Town

**6.191** None of the employment sites in Babergh District are expected to have a significant positive effect against SA Objective 16 (To enable efficient patterns of movement and modal shift towards sustainable modes of transport). In Mid Suffolk District, a small number of sites are expected to have a significant positive effect against this objective, mainly due to

the fact they are located within desirable walking distance of bus stops and cycleways. One of the sites, SS1287 (Land East of Tomo Business Park), is also located within desirable walking distance of a railway station and therefore performs more strongly than the other sites.

### Significant negative effects

Significant negative effect (--)					
Babergh District					
	Site ref.	Site names	Yield	Parish	JLP Classification
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	N/A	N/A	N/A	N/A	N/A
Reasonable alternative	N/A	N/A	N/A	N/A	N/A
Mid Suffolk District					
Allocated sites that are committed	N/A	N/A	N/A	N/A	N/A
Allocated sites	N/A	N/A	N/A	N/A	N/A
Reasonable alternatives	SS1144	Land south of Lavenham Road	1	Brent Eleigh	Hamlet/Countryside

**6.192** Only one site is expected to have a significant negative effect against SA Objective 16 (To enable efficient patterns of movement and modal shift towards sustainable modes of transport). This site is located in Mid Suffolk District and considered a reasonable alternative. The site is located beyond the preferred maximum walking distance to a railway station and cycle way.

#### Possible mitigation

**6.193** New or improved bus services and cycleways can form part of development proposals although, in practice, this is most likely to happen with larger sites, particularly for bus services. It is highly unlikely that new railway stations will be developed, except where associated with much larger scale development.

### Summary and conclusions for employment sites

**6.194** Summary tables of the SA scores for all the employment sites considered for inclusion in the JLP are shown in **Table 6.6**. They are presented by parish for each District to enable easy comparison of the performance of the sites at a local level.

- Site names that are in ***bold italics*** are those sites that are already committed and therefore automatically are allocated in the JLP. As of October 2020, these sites all had planning permission.
- Sites names that are **bold**, without italics, are those sites that do not yet have planning consent but are allocated in the JLP.
- Site names that are in normal text (i.e. are neither bold nor in italics) are sites that BMSDC have decided not to include in the JLP as allocations.

**6.195** There were many fewer sites considered for employment uses, when compared to residential uses and, unlike the residential sites, by far the majority have not been allocated in the JLP. Of the 53 sites subject to SA, only seven sites are allocated and, of these, two already have planning consent.

**6.196** Given that only often small numbers of sites in each of the JLP settlement hierarchy categories in each District were subject to SA, any generalised conclusions need to be treated with a considerable degree of caution. Bearing this in mind, our analysis suggests that, when looking across all the SA Objectives, if each SA Objective is given equal weight:

- Sites in the Market Towns and Urban Areas tended to perform slightly better than sites elsewhere, although not significantly so, but notably better than sites in the Hinterland Villages and Hamlets and Countryside.
- Sites in the Market Towns and Urban Areas and (although to a lesser extent) Ipswich Policy Area in Mid Suffolk are the best performing overall.
- Site size does not appear to make a difference in terms of performance.
- Most of the allocated sites perform relatively well, although there are some reasonable alternatives that perform as well, and some better both overall at both an individual and parish level.

**6.197** Two sites in particular appear not to perform that well both overall, and when compared to other potential employment sites in the parish in which they are found. These are SS0773 (Lawn Farm, Woolpit), which already has planning consent, and SS1027 (Land north of The Street, Wherstead), which does not yet have planning consent, although this is a relatively small site of three hectares.

**6.198** In terms of decision-making, the outcomes of the SA will have been one factor taken into account. Other factors, including other evidence bases, and responses to the public consultation will also have had an influence. In certain instances, a single issue, such as impact on the historic environment, may have been considered to outweigh other factors.

**6.199** The reasons for the decisions made are summarised in **Appendix G (Reasons for Selecting or Rejecting Site Options)** of this SA Report.

Table 6.6: Policy-off significance scores summary table (employment sites)

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
Babergh District																			
Acton Parish																			
SS1225	Land West of Bull Lane, Acton Industrial Estate	Hamlet/Countryside	3	N/A	N/A	-	N/A	-	--	-	N/A	-	--	--?	-?	-	+	--	-
Brent Eleigh Parish																			
SS1144	Land south of Lavenham Road	Hamlet/Countryside	1	N/A	N/A	-	N/A	--	--	++	N/A	--	0	--?	0?	0	+	--	--
Chilton Parish																			
SS0942	Land north of Newton Road / A134	Core Village	11	N/A	N/A	+	N/A	-	--	--	N/A	++	0	--?	-?	-	++	--	+
SS0948	The Hollies, Chilton Airfield	Hinterland Village	8	N/A	N/A	-	N/A	--	--	-	N/A	-	0	--?	-?	--	++	--	-
Copdock Parish																			
SS1260	Land south east of A12	Ipswich Policy Area	12	N/A	N/A	+	N/A	-	--	--	N/A	0	--	--?	-?	-	++	--	-
Copdock & Washbrook Parish																			
SS0227	Land between London Road and A12	Ipswich Policy Area	1	N/A	N/A	+	N/A	-	--	--	N/A	0	--	--?	-?	-	+	--	-
SS0918	Land east of London Road	Ipswich Policy Area	30	N/A	N/A	+	N/A	-	--	--	N/A	+	--	--?	-?	--	++	--	-

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
SS0919	Lane west of London Road and south of Folly Lane	Ipswich Policy Area	7	N/A	N/A	+	N/A	-	--	--	N/A	0	--	--?	-?	-	++	--	-
SS0944	Land north of Elm lane	Ipswich Policy Area	9	N/A	N/A	+	N/A	-	--	--	N/A	+	0	--?	--?	--	+	--	+
SS0945	Land south of Mill Lane and west of London Road	Ipswich Policy Area	20	N/A	N/A	+	N/A	-	--	-	N/A	+	0	--?	--?	--	++	--	+
Elmsett Parish																			
SS0726	Land to the south of Corn Hatches Lane	Hinterland Villages	7	N/A	N/A	-	N/A	-	--	-	N/A	0	-	--?	-?	-	++	--	+
Hadleigh Parish																			
SS1031	Land south of Ipswich Road	Urban Area/Market Town	5	N/A	N/A	+	N/A	-	--	-	N/A	0	-	--?	-?	--	++	--	-
<b>SS1035</b>	<b>Land to the east of Frog Hall Lane</b>	<b>Urban Area/Market Town</b>	<b>6</b>	N/A	N/A	+	N/A	-	--	-	N/A	+	0	--?	-?	--	++	-	-
SS1092	Land south of Stone Street	Urban Area/Market Town	0	N/A	N/A	+	N/A	-	-	-	N/A	0	0	--?	-?	-	+	--	-
Long Melford Parish																			
SS0811	Land to the north of Springlands Way (A134)	Urban Area/Market Town	0	N/A	N/A	+	N/A	--	--	--	N/A	+	0	--?	-?	--	++	--	+
SS0934	Land east of High Street & Harefield Rd and west of A134	Core Village	15	N/A	N/A	+	N/A	--	--	--	N/A	-	-	--?	--?	--	++	--	-

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
Sproughton Parish																			
SS0721	Sproughton Enterprise Park / Former Sugar Beet Factory Site	Ipswich Policy Area	50	N/A	N/A	+	N/A	-	--	++	N/A	++	-	--?	-?	0	++	--	+
SS1178	Land north of Sproughton Road	Ipswich Policy Area	40	N/A	N/A	+	N/A	--	--	-	N/A	+	--?	--?	--?	--	++	--	+
Wherstead Parish																			
SS1027	Land north of The Street	Ipswich Policy Area	3	N/A	N/A	+	N/A	--	--	--	N/A	+	0	--?	--?	-	+	--	+
SS1168	Land west of the A137	Ipswich Policy Area	11	N/A	N/A	+	N/A	--	--	-	N/A	+	0	--?	-?	-	++	--	+
SS1273	Park Farm Barns and land west of Vicarage Land	Ipswich Policy Area	10	N/A	N/A	+	N/A	--	--	--	N/A	+	0	--?	--?	-	++	--	+
Mid Suffolk District																			
Botesdale Parish																			
SS1249	Land south of Mill Road	Core Village	0	N/A	N/A	+	N/A	--	-	-	N/A	-	-	--?	--?	--	++	--	-
Botesdale & Rickinghall Parish																			
SS0939	Land east of Rectory Hill and south of The Street	Core Village	17	N/A	N/A	+	N/A	--	-	-	N/A	-	0	--?	--?	--	++	--	-
Bramford Parish																			
SS0937	Land east of Bramford Road / B1067	Ipswich Policy Area	11	N/A	N/A	++	N/A	-	--	-	N/A	+	0	--?	--?	-	++	--	+

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
Claydon Parish																			
SS0327	Land at Hill View Farm	Ipswich Policy Area	3	N/A	N/A	+	N/A	--	--	-	N/A	+	-	--?	0	-	+	--	+
SS0916	Land to the west of A14	Ipswich Policy Area	4	N/A	N/A	+	N/A	--	--	-	N/A	+	--	--?	-?	-	+	--	-
SS0926	Land west of Old Ipswich Road	Ipswich Policy Area	1	N/A	N/A	+	N/A	--	--	-	N/A	+	0	--?	0?	-	+	--	+
Combs Parish																			
SS0655	Land to the east of Tannery Road	Hinterland Village	38	N/A	N/A	-	N/A	--	-	++	N/A	-	--	--?	--	-	++	--	-
Drinkstone Parish																			
SS0791	Land west of Tostock Road and south of A14	Hamlet/Countryside	9	N/A	N/A	-	N/A	--	--	-	N/A	-	0	--?	-?	-	++	--	+
Elmswell Parish																			
SS0330	Land at Grove Lane	Core Village	14	N/A	N/A	+	N/A	--	--	-	N/A	-	--	--?	-?	-	++	--	-
Eye Parish																			
SS0928	Land at Eye Airfield	Urban Area/Market Town	10	N/A	N/A	+	N/A	--	-	-	N/A	+	--	--?	-?	-	++	--	+
Mendlesham Parish																			
SS0325	Land at Mendlesham Airfield	Core Village	70	N/A	N/A	-	N/A	-	-	-	N/A	-	0	--?	-?	-	++	--	-

Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
SS0333	Land at Tower Farm	Core Village	3	N/A	N/A	-	N/A	--	-	++	N/A	--	--	--?	-?	0	++	--	-
Needham Market Parish																			
SS1033	Council Offices	Urban Area/Market Town	1	N/A	N/A	+	N/A	--	--	++	N/A	++	0	--?	--?	0	+	++	++
SS1034	Council Offices Car Park	Urban Area/Market Town	1	N/A	N/A	+	N/A	-	--	++	N/A	++	0	--?	-?	+	+	++	++
Stonham Earl Parish																			
SS0792	Land north of A1120 and east of Church Lane	Hinterland Village	5	N/A	N/A	-	N/A	--	-	--	N/A	-	0	--?	-?	-	++	--	-
Stowmarket Parish																			
SS0324	Land north of Spikes Lane	Urban Area/Market Town	1	N/A	N/A	+	N/A	-	-	-	N/A	++	--	--?	0?	-	+	--	+
SS0436	Land south-west of Needham Road	Urban Area/Market Town	12	N/A	N/A	+	N/A	-	-	--	N/A	++	-	--?	0?	-	++	--	+
SS0930	Land north-east of Tot Hill	Urban Area/Market Town	1	N/A	N/A	+	N/A	--	-	-	N/A	+	0	--?	0?	-	+	--	+
<b>SS1032</b>	<b>Land south of Gun Cotton Way</b>	<b>Urban Area/Market Town</b>	<b>11</b>	N/A	N/A	+	N/A	--	--	--	N/A	++	-	--?	0?	0	+	-	++

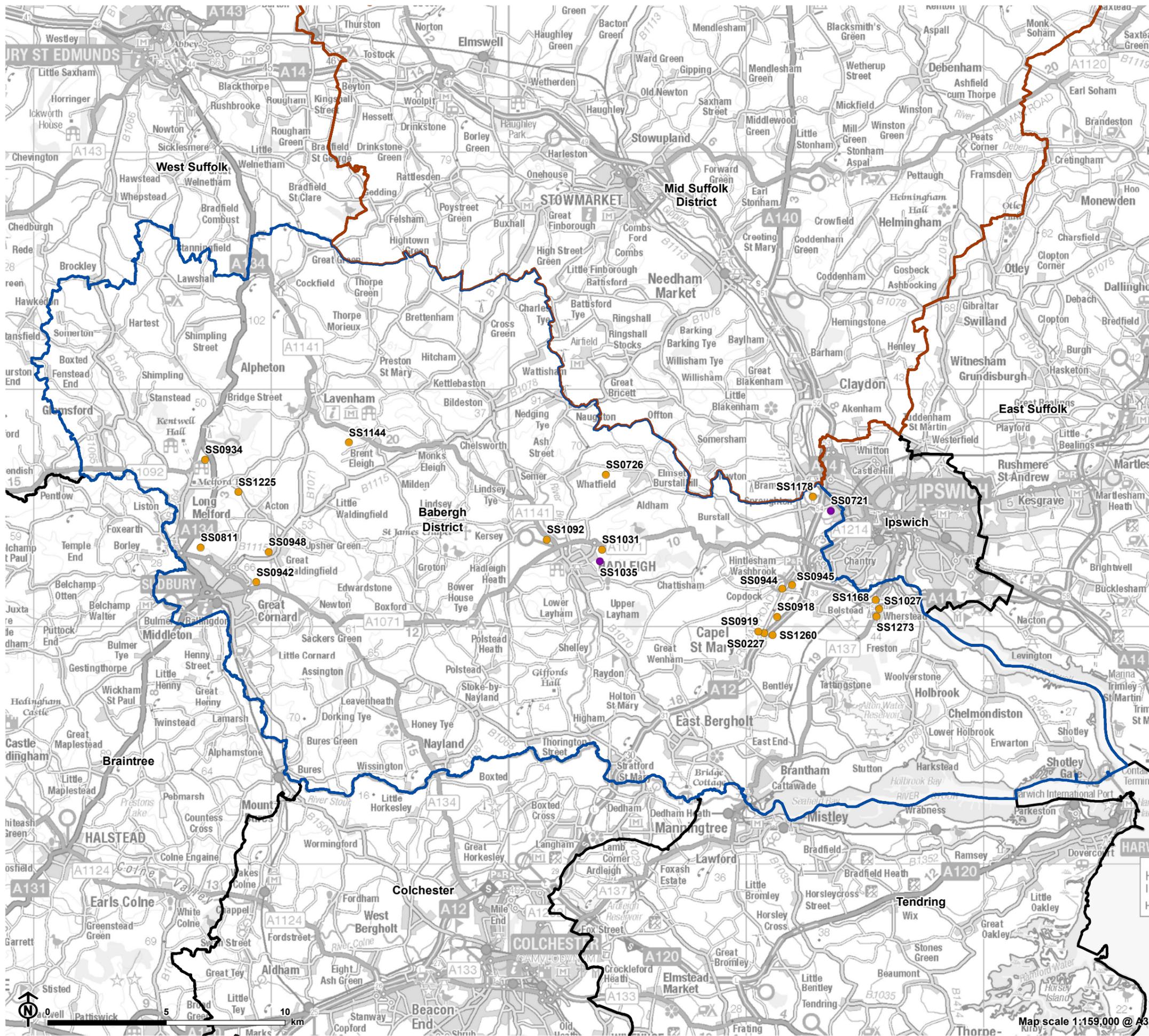
Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
<b>SS1223<sup>50</sup></b>	<b>Land at Mill Lane</b>	<b>Ipswich Policy Area</b>	<b>79</b>	N/A	N/A	+	N/A	--	-	-	N/A	++	--	--?	--?	-	++	--	+
SS1282	Land off Gipping Way	Urban Area/Market Town	1	N/A	N/A	+	N/A	--	--	-	N/A	++	--	--?	-?	0	+	-	++
SS1286	Land Opposite Linnet Drive	Urban Area/Market Town	3	N/A	N/A	+	N/A	-	--	++	N/A	++	0	--?	0?	0	+	-	+
SS1287	Land East of Tomo Business Park	Urban Area/Market Town	0	N/A	N/A	+	N/A	-	--	++	N/A	++	0	--?	-?	0	+	+	++
Tostock Parish																			
SS0924	Land south of New Road and north of A14	Hinterland Village	1	N/A	N/A	-	N/A	--	--	-	N/A	-	0	--?	-?	-	+	--	-
Wetherden Parish																			
SS0782	Land north of New Haughley Street	Hamlet/Countryside	5	N/A	N/A	-	N/A	--	--	-	N/A	-	0	--?	-?	--	++	--	-
Wetheringsett-cum-Brockford																			
SS0536	Land east of Norwich Road	Core Village	17	N/A	N/A	-	N/A	--	-	-	N/A	--	0	--?	-?	-	++	--	-
Woolpit Parish																			
SS0328	Goldstar Transport Ltd, Elmswell Road	Core Village	4	N/A	N/A	+	N/A	--	--	-	N/A	+	-	--?	-?	-	+	--	+

<sup>50</sup> Site SS1223 was allocated in the Stowmarket Area Action Plan (2013).

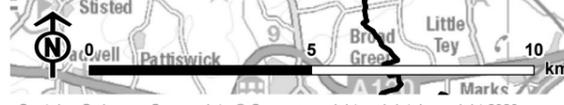
Site ref.	Site name	JLP Classification	Yield	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
<b>SS0773</b>	<b>Lawn Farm</b>	<b>Core Village</b>	<b>17</b>	N/A	N/A	+	N/A	--	--	--	N/A	-	-	--?	-?	--	++	--	-
SS0787	Land south of A14	Core Village	4	N/A	N/A	+	N/A	--	--	-	N/A	-	0	--?	0?	-	+	--	-
SS1154	Land to the south of the A14	Core Village	3	N/A	N/A	+	N/A	--	--	-	N/A	0	--	--?	0?	-	+	--	-
SS1156	Land south of Old Stowmarket Road	Core Village	30	N/A	N/A	+	N/A	--	--	-	N/A	+	--	--?	-?	--	++	--	+
SS1158	Land south-west of Wood Road	Core Village	2	N/A	N/A	+	N/A	--	--	-	N/A	-	0	--?	-?	--	+	--	-



Figure 6.3: Employment sites subject to SA in Babergh District



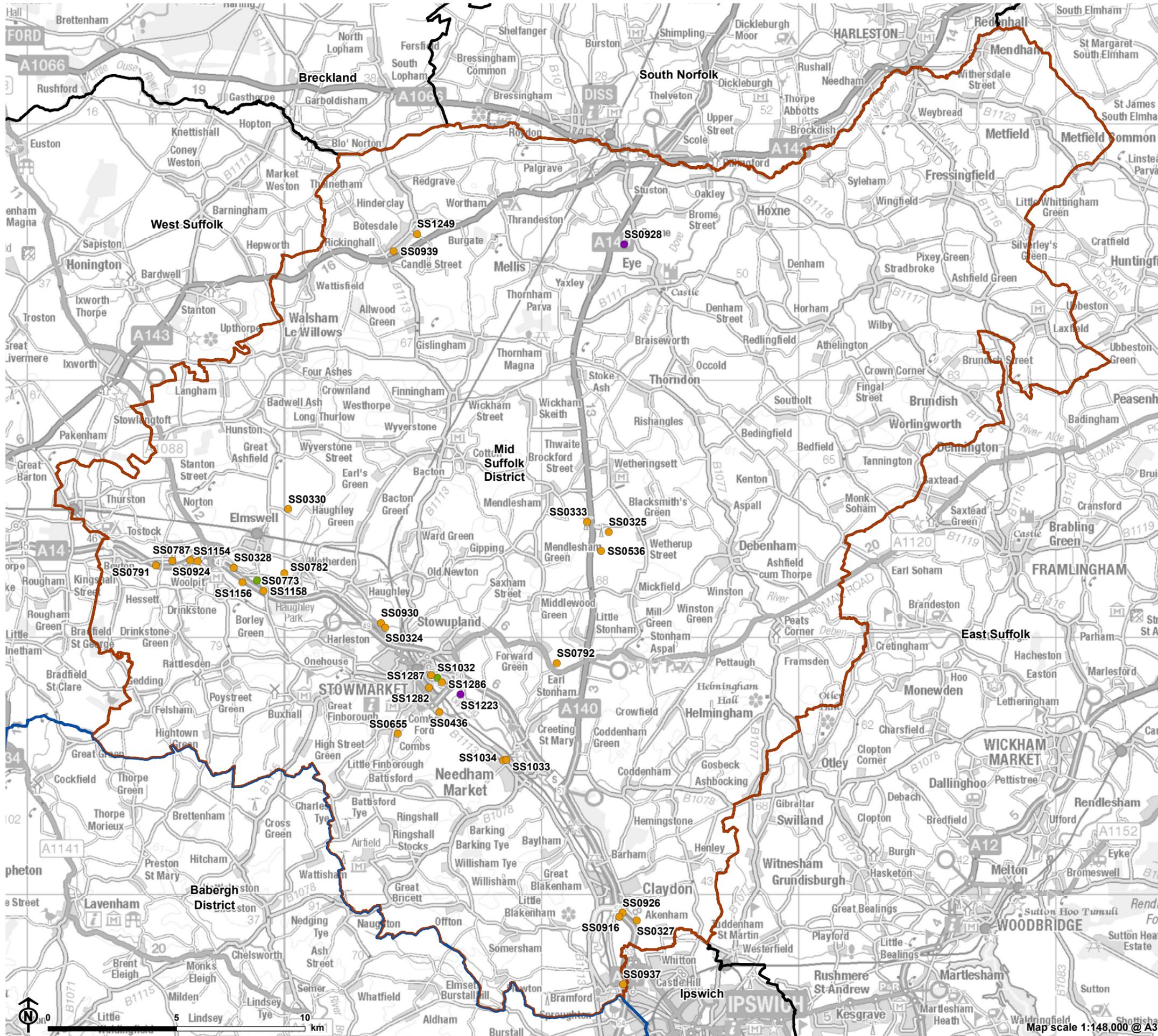
- Babergh District
  - Mid Suffolk District
  - Neighbouring local authority
- Site**
- Committed and allocated
  - Allocated not committed
  - Not committed or allocated



Map scale 1:159,000 @ A3



Figure 6.4: Employment sites subject to SA in Mid Suffolk District



- Babergh District
  - Mid Suffolk District
  - Neighbouring local authority
- Site**
- Committed and allocated
  - Allocated not committed
  - Not committed or allocated

## New settlement alternatives

### Background

**6.200** National planning policy is supportive of sustainable new settlements. Para 72 in the NPPF sets out that:

*“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.”*

**6.201** The SA of Spatial Strategy Options in **Chapter 5 (Sustainability Appraisal Findings for the Spatial Strategy Options)** found that a new settlement option could potentially perform relatively well in sustainability terms if a location could be found that does not have environmental constraints, but that it is difficult to achieve self-containment within a new settlement, particularly smaller scale new settlements that do not provide a full range of services, facilities and jobs. On the other hand, a new settlement could ‘design-in’ walking and cycling etc. from the start.

**6.202** The Babergh and Mid Suffolk Joint Local Plan Preferred Options consultation document (July 2019), set out some of the key criteria for consideration of the broad location that a new settlement could be based upon:

1. Significant land for a genuine discrete new settlement, or the realistic prospect for transformational development, both in nature and scale, of an existing settlement.
2. Opportunities for significant reuse of brownfield land.
3. Opportunities for improvement and integration of strategic transport routes.
4. Accessibility to job concentrations, or the realistic prospect for significant new employment land located with new homes.
5. Opportunities to optimise new infrastructure delivery.

### New settlement submissions

**6.203** The following locations have been submitted through the JLP process through either the formal ‘call for sites’ processes, the 2019 Regulation 18 JLP Consultation or the Babergh and Mid Suffolk Sustainability Appraisal Scoping Consultation (March 2020):

- Sproughton (Babergh)
- Copdock (Babergh)
- Belstead (Babergh)
- Hintlesham-Hadleigh (Babergh)
- Holton St Mary (Babergh)
- Mendlesham (Mid Suffolk)
- Eye (Mid Suffolk)
- Akenham (Mid Suffolk)

**6.204** Indicative locations for these new settlement proposals are shown in **Figure 6.5**.

### BMSDC assessment of new settlement submissions

**6.205** BMSDC have carried out an assessment of the new settlement submissions against the criteria set out in the July 2019 JLP as shown in **Table 6.7** below.

**6.206** Having considered the concept of a new settlement, and the specific proposals put forward by land promoters, BMSDC have concluded that none of the new settlement submissions should be considered as reasonable alternatives for this JLP. This is because:

- None of the new settlement proposals clearly meet the criteria set out in the JLP for a new settlement.
- There is a sufficient supply of proportionate sites in and around existing settlements to meet the Councils’ Objectively Assessed Need.
- The long lead-in and delivery times required to deliver a new settlement.

**6.207** As a result, the new settlement proposals put forward by land promoters have not been subject to SA.

**6.208** Whilst a new settlement approach has been discounted from the current Joint Local Plan (due to the long lead in and delivery times), the Council are mindful to give consideration to the longer term prospect of planning for a new settlement at Plan review, which is due to be undertaken within five years of the adoption of the JLP. This is set out in the supporting text to Policy SP04 (Housing Spatial Distribution).

Table 6.7: BMSDC assessment of new settlement submissions against JLP criteria

Key New Settlement Criteria for Babergh and Mid Suffolk	Considerations
(I) Significant land for a genuine discrete new settlement, or the realistic prospect for transformational development, both in nature and scale, of an existing settlement	<p>All of the areas are considered to comprise the potential land area (at least 50ha) to accommodate a scale of growth proportionate to a village-scale new settlement (c. able to accommodate c/ 1,500 homes with some local stand-alone facilities and supporting infrastructure).</p> <p>Locationally not all of the areas would be considered discrete new settlements.</p> <p>Three of the proposed submissions (Sproughton, Copdock and Belstead) are located within the Ipswich Fringe which is a designated growth area of close functional relationship to Ipswich in the Joint Local Plan. A diversity of allocation sites (of varying scales) within this area have been identified in the JLP (with LA### references) and are accounted for accordingly in the settlement hierarchy under Ipswich Fringe. A new settlement within the Ipswich Fringe area would not be considered functionally discrete and Ipswich already has a substantial Garden Suburb (of approx. 3,500 dwellings) being delivered through the Ipswich Borough Council Local Plan.</p> <p>The proposed areas of search in the Hintlesham, Akenham and Holton St Mary areas, have the potential to provide for a new and discrete area of development suitable to accommodate the c. 1,500 dwellings upwards with supporting infrastructure and services, however they have limitations on potential for criteria (II – V). Hintlesham and Akenham are not located in close proximity to the strategic infrastructure network. The limited facilities, particularly in Akenham and Holton St Mary, would have consequences for the scale of growth required if any proposition is to be considered sustainable in accordance with the NPPF, para 72.</p> <p>Mendlesham and Eye are considered more akin to an extension to the existing settlements and are not considered functionally discrete. Both settlements currently have a Neighbourhood Plan and JLP allocations to meet their needs. Mendlesham Parish is currently reviewing their neighbourhood plan.</p>
(II) Opportunities for significant reuse of brownfield land	<p>The sites with potential for significant re-use of brownfield land are limited to the former airfield sites in Eye and Mendlesham, both of which are considered to be extensions to the existing settlements rather than new and or discrete settlements.</p>
(III) Opportunities for improvement and integration of strategic transport routes	<p>The A12, A14 and A140 comprise the strategic transportation routes identified by the JLP. With the exception of allocations contained within the Ipswich Fringe growth area, all settlements would require substantive upgrade to access the strategic road network. Hintlesham and Akenham are located over a mile from the network. Consequently, to varying degrees, all would require significant transport infrastructure investment to both connect to and enhance the network.</p> <p>The proposal at Belstead sets out that the location of development in this area could improve the opportunities for Government RIS 3 funding for the A12/A14 Copdock interchange. However, at present this is an area of significant infrastructure constraint which needs to be managed strategically. The Ipswich Strategic Policy Area has identified a number of transport mitigations which are being delivered, including improvements to modal shift, at a strategic level. It would be fundamental that any development in the locality of the area would not exacerbate the identified constraints and hinder delivery across the wider area during the Plan period.</p> <p>The proposal at Akenham references links to the Ipswich Northern Relief Road. At this stage however it is unclear whether this transportation project will be delivered in the future, beyond the timeframe of the Joint Local Plan.</p>

Key New Settlement Criteria for Babergh and Mid Suffolk	Considerations
<p>(IV) Accessibility to job concentrations, or the realistic prospect for significant new employment land located with new homes</p>	<p>All options appear reasonably nearby employment concentrations (perhaps Holton being the most remote). Some such as Mendlesham and Eye are effectively built around an existing employment location (albeit with potentially limited diversity of employment opportunities).</p> <p>The remainder of the new settlement proposals are beyond walking distance to employment concentrations and/or have physical barriers and/or minor roads between the new settlement location and the employment concentrations (e.g. the A12 and A14 for Belstead; and the A14/railway line for Sproughton)</p> <p>Although the new settlement proposals do or are likely to include provision for employment, none are likely to be able to provide sufficient scale and diversity of employment on site to facilitate a significant degree of self-containment.</p>
<p>(V) Opportunities to optimise new infrastructure delivery</p>	<p>Beyond the Ipswich Fringe growth area and the edge of settlement proposals in Mendlesham and Eye, all of the locations for proposed new settlements are in areas where existing facilities are limited. As set out in the NPPF (para 72) there is a need for the settlements to be supported by the necessary infrastructure. This would require a critical mass of development from 1,500 upwards depending on the specific requirements for infrastructure delivery.</p>

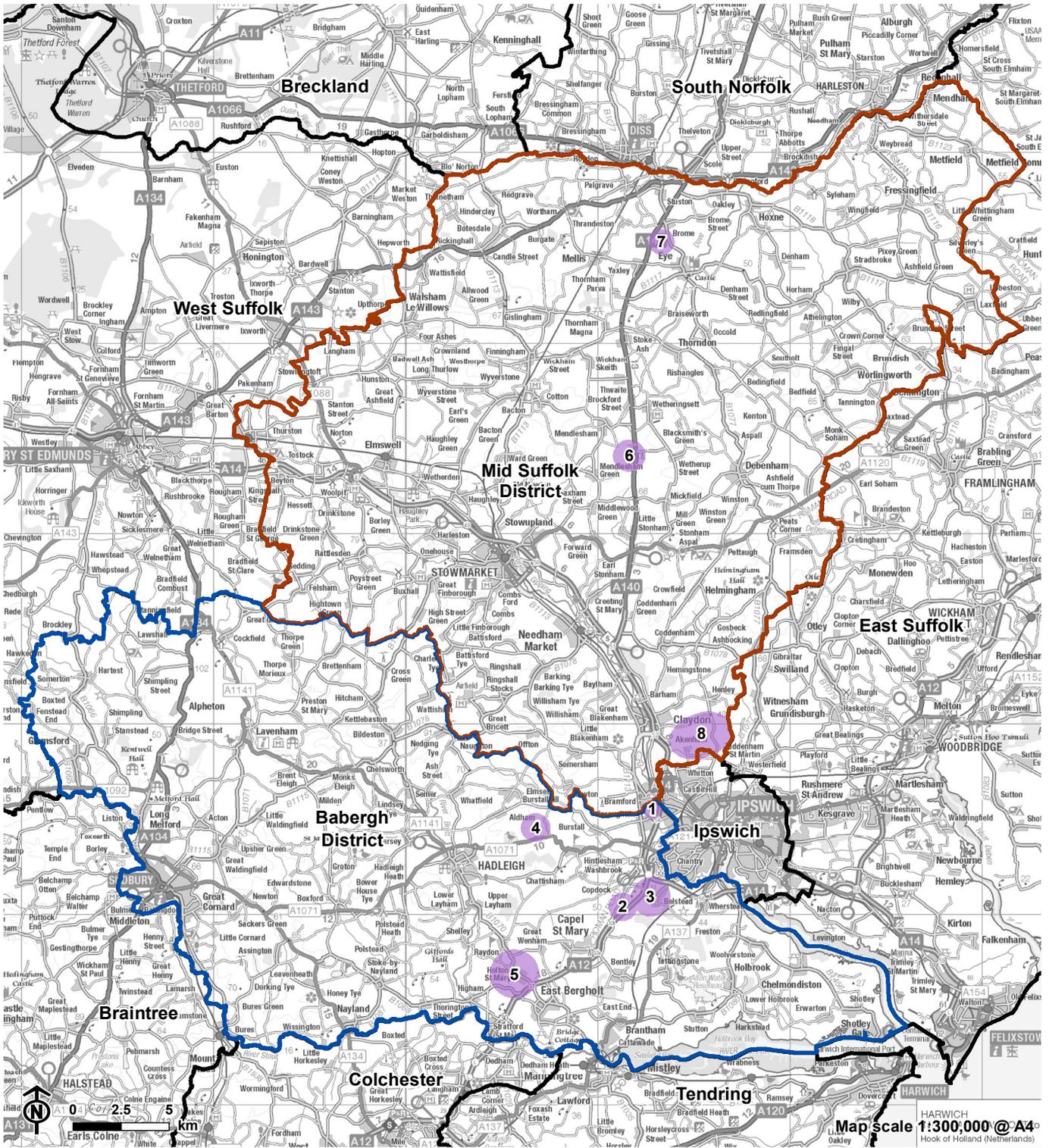


Figure 6.5: New settlement submissions

- Babergh District
  - Mid Suffolk District
  - Neighbouring local authority
  - Locations of submitted new settlement proposals
- |               |                        |
|---------------|------------------------|
| 1: Sproughton | 3: Belstead            |
| 2: Copdock    | 4: Hintlesham-Hadleigh |
|               | 5: Holton St Mary      |
|               | 6: Mendlesham          |
|               | 7: Eye                 |
|               | 8: Akenham             |

# Chapter 7

## Sustainability Appraisal

### Findings for the Joint Local Plan

This chapter describes the effects of implementing the Joint Local Plan including cumulative effects. It describes the effects of reasonable alternative policy approaches as well as the reasons given by the Councils for choosing the policies in the Joint Local Plan.

#### Introduction

7.1 The Joint Local Plan is divided into three parts:

- Part 1: Vision, Objectives and Strategic Policies
- Part 2: Local Policies
- Part 3: Place and Allocation Policies

7.2 The SA has appraised each component part of the JLP and the findings are set out in this chapter of the SA. It includes an appraisal of reasonable alternative policy approaches, where these have been considered by BMSDC in deciding which policy approach to include in the JLP.

7.3 A summary of the 'policy-on' effects of the Place and Allocation Policies is presented, which describes the effects of implementing site allocations taking into account the mitigation provided in each policy. The detailed 'policy-on' site allocation appraisals are provided in **Appendix F (Detailed Appraisal of Place and Allocations Policies)** of this SA Report. It should be noted that a large number of allocated sites already have planning consent. The SA, however, is of the JLP policies as worded, not of the planning consents themselves. Therefore, where there are conditions or planning obligations included as part of the planning consent, they will not be reflected in this SA unless they are also mentioned in the relevant policy in the JLP.

7.4 Following the SA of each JLP policy, a section is provided that describes the anticipated cumulative effects of implementing the JLP. This is divided into three components:

- The cumulative effects of site allocations on individual settlements in the JLP.
- The cumulative effects of the policies in the JLP as a whole.
- The cumulative effects of the JLP with development proposed in other plans or projects in Suffolk neighbouring authorities.

**7.5** This chapter also includes the reasons why BMSDC has decided to include the policy approaches in the JLP compared to reasonable alternatives. It also provides a summary of how BMSDC has taken into account the recommendations of the SA in preparing the JLP.

## Vision

**7.6** This section describes the findings of the SA in relation to the overarching Vision for the JLP. The Vision for the JLP is as follows:

*By 2037, Babergh and Mid Suffolk Districts will have transitioned to a low carbon future, with the ambition to be carbon neutral by 2030. Significant growth will have occurred embedding the principles of sustainable development, balancing social, economic and environmental issues.*

*Major new housebuilding will have taken place including the delivery of affordable housing for first time buyers and those on low incomes, whilst recognising the Districts have an ageing population. Strategic employment sites will be protected, and their proposed expansion supported in principle to ensure jobs are retained locally and created where opportunities exist, allowing businesses to expand and new businesses to invest in the area.*

*There will be enhanced biodiversity through the delivery of net gains across the Districts supported by an identified ecological network. The historic and landscape character of the Districts will be apparent with development being sensitive to this character and applying good design principles.*

*There will be a clear vision for the towns of Hadleigh and Sudbury in Babergh, and for Eye, Needham Market, and Stowmarket in Mid Suffolk. Many communities will have adopted neighbourhood plans, adding locally to the decision-making process.*

*A significant amount of growth will have taken place within the strategic transport corridors recognising the opportunities that exist to move around the area and the relationship with the wider housing market area and functional economic area.*

*Infrastructure including education, health and transport will have been delivered, including school extensions,*

*expanded health facilities and more opportunities for walking, cycling and use of public transport, as communities grow with active and healthy futures.*

## SA findings

**7.7** The likely sustainability effects of the Vision and Objectives have been appraised and the results presented in **Table 7.1**.

**7.8** The Vision for both Districts sets out a general ambition for development to take place in a sustainable way, embracing a mix of social, economic and environmental aspirations. This will enable both Districts to be attractive places to live, work and invest. The Vision also reflects the Climate Emergency declared by BMSDC in July 2019, with reference to their ambition to become carbon neutral by 2030.

**7.9** If the Vision is achieved, it can be expected to lead to significant positive effects against the following SA Objectives:

- SA Objective 1 (Health and Wellbeing), because if other aspects of the Vision are achieved, such as the delivery of affordable homes, walking and cycling, and active and healthy futures, this will provide the foundations for people's health and wellbeing to improve.
- SA Objective 3 (Accessibility), because the Vision emphasises investment in community infrastructure such as education, health and transport.
- SA Objective 4 (Housing), because housing needs will have been met.
- SA Objective 9 (Climate Change Mitigation), because carbon neutrality will have been achieved by 2030.
- SA Objective 11 (Biodiversity and Geodiversity), because the Vision seeks to deliver net gains in biodiversity rather than simply biodiversity that already exists.
- SA Objective 14 (Economic Growth), because the Vision sees the strategic employment locations growing, but as these are focused in a limited number of locations, a minor negative effect may also result for economic activity and employment elsewhere in the Plan area.
- SA Objective 16 (Sustainable Travel), because of the emphasis on walking, cycling and use of public transport, but with significant growth targeted in the strategic transport corridors, this could lead to increased car use, resulting also in a minor negative effect.

**7.10** Achievement of the Vision is also likely to result in minor positive effects against SA Objective 2 (Education and Skills), SA Objective 12 (Historic Environment), SA Objective 13

(Landscape/Townscape) and SA Objective 15 (Town Centres).

**7.11** Because they are not specifically mentioned, the Vision's contribution to the achievement of the following objectives is likely to be negligible: SA Objective 5 (Water), SA Objective 6 (Air and Noise), SA Objective 7 (Soils and Minerals) and SA Objective 8 (Waste).

**7.12** The Vision is unlikely to have any significant adverse effects in relation to the SA Objectives.

**7.13** All of the effects of the Vision are subject to some uncertainty since their achievement will depend on the details of the Part 1 and 2 JLP policies and site allocations which are designed to implement them. The effects of the policies and site allocations are examined later in the SA report.

## Objectives

**7.14** The Vision is supported by nine strategic objectives:

### Housing

1. Delivery of the right types of homes, of the right tenure in the right place meeting need.

### Economy

2. Encourage the development of employment sites and other business growth, of the right type, in the right place and encourage investment in infrastructure, skills and innovation in order to increase productivity.
3. To encourage inward investment to the Districts by supporting infrastructure improvements that will enable the continued growth of The Port of Felixstowe and strengthen the Districts' links to The Port of Felixstowe and the rest of the UK.

### Environment

4. To protect and enhance environmental assets (including designated sites, landscapes, heritage, biodiversity net gains, green spaces, air and water quality, and river corridors) for current and future generations.
5. Ensure new development avoids areas of flood risk and reduce future flood risk.
6. To reduce the drivers of climate change as much as possible from a social, economic and environmental perspective, with the ambition to be carbon neutral by 2030.

### Healthy Communities & Infrastructure

7. To enable all communities to thrive, grow, be healthy, active and self-sufficient through supporting the provision of the necessary infrastructure, and encouraging more sustainable travel.

**8.** To support communities to deliver plans and projects at the district and neighbourhood levels, specifically providing opportunities for the District Councils supporting communities on the development on neighbourhood plans.

**9.** To work with the communities of Hadleigh and Sudbury in Babergh and Stowmarket in the development of a vision and strategy for both towns.

## SA findings

### Objective 1

**7.15** Objective 1 seeks to deliver the right types of homes, of the right tenure in the right places. As the objective aims to increase housing supply, it is expected to have a significant positive effect in relation to SA Objective 4 (Housing).

**7.16** In addition, providing different types and tenures of housing may help reduce deprivation and social exclusion, and improve the health and wellbeing of the population overall. Therefore, the objective is likely to have a minor positive effect in relation to SA Objective 1 (Health and Wellbeing).

**7.17** Objective 1 is expected to have a negligible effect against the remaining SA Objectives.

### Objective 2

**7.18** Objective 2 encourages the development of employment sites and other business growth. Furthermore, it encourages investment in infrastructure, skills and innovation. As such, this objective is expected to have significant positive effects in relation to SA Objective 14 (Economic Growth) and SA Objective 2 (Education and Skills).

**7.19** In addition, encouraging business growth and the development of employment sites will increase employment opportunities. This is likely to reduce levels of unemployment and deprivation. As such, a significant positive effect is also expected in relation to SA Objective 3 (Accessibility) and a minor positive effect is expected in relation to SA Objective 1 (Health and Wellbeing).

**7.20** Objective 2 is expected to have a negligible effect against the remaining SA Objectives.

### Objective 3

**7.21** Objective 3 seeks to encourage inward investment to the Districts by supporting infrastructure improvements that will enable the continued growth of and links to The Port of Felixstowe. Strengthening links to The Port of Felixstowe will result in this objective having a significant positive effect against SA Objective 14 (Economic Growth).

**7.22** The continued growth of The Port of Felixstowe as a result of inward investment will also create opportunities for skills development and employment, which may reduce levels of unemployment and deprivation, although The Port itself is outside the JLP area. Therefore, minor positive effects are expected against SA Objective 3 (Accessibility), SA Objective 2 (Education and Skills) and SA Objective 1 (Health and Wellbeing).

**7.23** Objective 3 is expected to have a negligible effect against the remaining SA Objectives.

#### Objective 4

**7.24** Objective 4 seeks to protect and enhance environmental assets. The objective specifically states that the JLP aims to achieve biodiversity net gains, therefore, a significant positive effect is expected against SA Objective 11 (Biodiversity and Geodiversity).

**7.25** The objective explicitly references the protection and enhancement of landscapes and heritage, although in less specific terms than biodiversity. Therefore, a minor positive effect is expected in relation to SA Objective 12 (Historic Environment) and SA Objective 13 (Landscape/Townscape). Reference is also made to the protection and enhancement of air and water quality, and river corridors. Therefore, minor positive effects are also expected against SA Objective 5 (Water) and SA Objective 6 (Air and Noise).

**7.26** The objective also seeks to protect and enhance green spaces. Continued and improved access to green spaces will have beneficial effects on people's physical health and mental wellbeing. Therefore, a minor positive effect is also expected against SA Objective 1 (Health and Wellbeing).

**7.27** Objective 4 is expected to have a negligible effect against the remaining SA Objectives.

#### Objective 5

**7.28** Objective 5 seeks to ensure new development avoids areas of flood risk and reduces future flood risk. Flooding is expected to become more frequent as a result of climate change. Therefore, by locating development away from areas of flood risk and incorporating measures to reduce flood risk, this objective is expected to have a significant positive effect against SA Objective 10 (Climate Change Adaptation).

**7.29** The requirement for mitigation measures to reduce future flood risk, for example through the implementation of SuDS, is likely to have minor positive effects in relation to SA Objective 5 (Water). Furthermore, the sustainable use of water in new development such as rainwater harvesting may also reduce surface-water runoff. This could improve water quality and also reduce flood risk.

**7.30** Objective 5 is expected to have a negligible effect against the remaining SA Objectives.

#### Objective 6

**7.31** Objective 6 aims to reduce the drivers of climate change from a social, economic and environmental perspective, with the ambition to be carbon neutral by 2030. As the overarching aim of the objective is to decelerate climate change, a significant positive effect is expected against SA Objective 9 (Climate Change Mitigation).

**7.32** Objective 6 is expected to have a negligible effect against the remaining SA Objectives.

#### Objective 7

**7.33** Objective 7 seeks to enable all communities to thrive, grow, be healthy, active and self-sufficient through supporting the provision of necessary infrastructure, and encouraging more sustainable travel. As this objective seeks to provide infrastructure for communities, such as health, education and community facilities, open space, and play space, it is considered that significant positive effects are likely in relation to SA Objective 1 (Health and Wellbeing) and SA Objective 2 (Education and Skills). Furthermore, encouraging more sustainable travel is expected to result in a significant positive effect against SA Objective 16 (Sustainable Travel).

**7.34** The objective is also expected to have a minor positive effect against SA Objective 5 (Water) and SA Objective 8 (Waste) by ensuring there is sufficient water supply, treatment infrastructure and waste management to meet the needs of new development.

**7.35** Objective 7 is expected to have a negligible effect against the remaining SA Objectives.

#### Objective 8

**7.36** Objective 8 seeks to support communities to deliver plans and projects at the district and neighbourhood levels. Although this will have beneficial effects on community participation in planning, it does not directly affect any of the sixteen SA Objectives.

#### Objective 9

**7.37** Objective 9 seeks to work with the communities of Hadleigh and Sudbury in Babergh and Eye, Needham Market and Stowmarket in Mid Suffolk in the development of a vision and strategy for these towns. Although this will have beneficial effects on community participation in planning, it does not directly affect any of the sixteen SA Objectives.

7.38 It is noted that none of the objectives explicitly address SA Objective 7 (Soils and Minerals) and SA Objective 15 (Town Centres).

Table 7.1: Summary of SA scores for the Publication Draft JLP Vision and Objectives

SA Objective	Vision	Objective 1	Objective 2	Objective 3	Objective 4	Objective 5	Objective 6	Objective 7	Objective 8	Objective 9
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	++?	+	+	+	+	0	0	++	0	0
2. To maintain and improve levels of education and skills in the population overall.	++?	0	++	+	0	0	0	++	0	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	++?	0	++	+	0	0	0	0	0	0
4. To meet the housing requirements of the whole community.	++?	++	0	0	0	0	0	0	0	0
5. To conserve and enhance water quality and resources.	0	0	0	0	+	+	0	+	0	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0	0	0	0	+	0	0	0	0	0
7. To conserve soil and mineral resources.	0	0	0	0	0	0	0	0	0	0
8. To promote the sustainable management of waste.	0	0	0	0	0	0	0	+	0	0
9. To reduce contribution to climate change.	++?	0	0	0	0	0	++	0	0	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0	0	0	0	0	++	0	0	0	0
11. To conserve and enhance biodiversity and geodiversity.	++?	0	0	0	++	0	0	0	0	0
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	++?	0	0	0	+	0	0	0	0	0
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	++?	0	0	0	+	0	0	0	0	0
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	++/- ?	0	++	++	0	0	0	0	0	0
15. To revitalise the Districts' town centres.	++?	0	0	0	0	0	0	0	0	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport	++/- ?	0	0	0	0	0	0	++	0	0

## Part 1: SA of Strategic Policies

### Policy SP01 – Housing Needs

#### A. Policy SP01 – Housing Needs.

No alternative options are put forward at this stage, as there is no evidence to suggest that the housing requirement should be set at any level other than the local housing need figure.

#### Babergh District

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	0
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	0
4. To meet the housing requirements of the whole community.	++
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	0
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	0
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	0
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

#### Option A: Policy SP01 – Housing Needs (Babergh District)

**7.39** Policy SP01 (Housing) sets out the housing requirement for Babergh District, as identified in the Ipswich Housing Market Area and using the government's standard methodology for calculation of housing need. The policy seeks

to deliver 7,904 (416 dwellings per annum) over the plan period within Babergh District. This is a considerable amount of housing and according to Policy SP01, the mix, type and size of new housing development should reflect established needs. Therefore, a significant positive effect is expected against SA Objective 4 (Housing).

## Mid Suffolk

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	0
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	0
4. To meet the housing requirements of the whole community.	++
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	0
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	0
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	0
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

### Option A: Policy SP01 – Housing Needs (Mid Suffolk District)

**7.40** Policy SP01 (Housing) sets out the housing requirement for Mid Suffolk District, as identified in the Ipswich Housing Market Area and using the government's standard methodology for calculation of housing need. The policy seeks to deliver 10,165 dwellings (535 dwellings per annum) over the plan period within Mid Suffolk District. This is a considerable amount of housing and according to Policy SP01, the mix, type and size of new housing development should reflect established needs. Therefore, a significant positive effect is expected against SA Objective 4 (Housing).

## Policy SP02 – Affordable Housing

- A. SP02 – Affordable Housing.  
B. Lower than the on-site affordable housing (AH) need requirement to the SHMA level.

### Babergh District

SA Objective	A.	B.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	0	0
2. To maintain and improve levels of education and skills in the population overall.	0	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	0	0
4. To meet the housing requirements of the whole community.	++	+/-
5. To conserve and enhance water quality and resources.	0	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0	0
7. To conserve soil and mineral resources.	0	0
8. To promote the sustainable management of waste.	0	0
9. To reduce contribution to climate change.	0	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0	0
11. To conserve and enhance biodiversity and geodiversity.	0	0
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	0	0
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	0	0
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0	0
15. To revitalise the Districts' town centres.	0	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0	0

#### Option A: Policy SP02 – Affordable Housing (Babergh District)

**7.41** According to Policy SP02, the Plan will assist to deliver 2,096 affordable dwellings in Babergh District up to 2037. This represents 27% of the total housing need requirement for the District.

**7.42** Policy SP02 (Affordable Housing) sets out the proportion of affordable housing that must be provided as part of development in Babergh District at 35%. According to the policy, proposals for new affordable housing must have regard to the mix and type of housing needs identified in both Districts. Therefore, as well as providing affordable housing

this policy ensures that different people's needs are met in relation to housing type. Although this percentage of affordable housing could raise issues regarding viability for some sites, it provides a buffer over and above the specific affordable housing needs requirements. This should allow for some scope for flexibility for the delivery of the full requirement for affordable housing regarding the viability test on a site-by-site basis. This should help to achieve the overall affordable housing need requirement for the District, recognising that small sites below ten dwellings and 0.5 hectares will not be required to contribute to affordable housing need. As such, a significant positive effect is expected in relation to SA Objective 4 (Housing).

**Option B: Lower than the on-site affordable housing (AH) need requirement to the SHMA level**

**7.43** Option B would deliver a lower amount of on-site affordable housing than is set out in the SHMA. Therefore, although this option would ensure the delivery of some

affordable housing, it would be less likely to meet the identified need for affordable housing. As such, a mixed minor positive and minor negative effect is expected in relation to SA Objective 4 (Housing).

**Mid Suffolk District**

SA Objective	A.	B.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	0	0
2. To maintain and improve levels of education and skills in the population overall.	0	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	0	0
4. To meet the housing requirements of the whole community.	++	+/-
5. To conserve and enhance water quality and resources.	0	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0	0
7. To conserve soil and mineral resources.	0	0
8. To promote the sustainable management of waste.	0	0
9. To reduce contribution to climate change.	0	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0	0
11. To conserve and enhance biodiversity and geodiversity.	0	0
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	0	0
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	0	0
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0	0
15. To revitalise the Districts' town centres.	0	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0	0

**Option A: Policy SP02 – Affordable Housing (Mid Suffolk District)**

**7.44** According to Policy SP02, the Plan will assist to deliver 2,428 affordable dwellings in Mid Suffolk District up to 2037. This represents 24% of the total housing need requirement for the District.

**7.45** Policy SP02 (Affordable Housing) sets out the proportion of affordable housing that must be provided as part of development in Mid Suffolk District at 35%. According to the policy, proposals for new affordable housing must have regard to the mix and type of housing needs identified in both

Districts. Therefore, as well as providing affordable housing this policy ensures that different people's needs are met in relation to housing type. Although this percentage of affordable housing could raise issues regarding viability for some sites, it provides a buffer over and above the specific affordable housing needs requirements. This should allow for some scope for flexibility for the delivery of the full requirement for affordable housing regarding the viability test on a site-by-site basis. This should help to achieve the overall affordable housing need requirement for the District, recognising that small sites below ten dwellings and 0.5 hectares will not be required to contribute to affordable housing need. As such, a

significant positive effect is expected in relation to SA Objective 4 (Housing).

**Option B: Lower than the on-site affordable housing (AH) need requirement to the SHMA level**

**7.46** Option B would deliver a lower amount of on-site affordable housing than is set out in the SHMA. Therefore,

although this option would ensure the delivery of some affordable housing, it would be less likely to meet the identified need for affordable housing. As such, a mixed minor positive and minor negative effect is expected in relation to SA Objective 4 (Housing).

**Discounted alternative options**

- **Option B: Lower than the on-site affordable housing (AH) need requirement to the SHMA level:** It is not considered appropriate to lower the AH requirement as this would not be likely to deliver the identified district volume of AH overall (not every site contributes to AH). Viability is built into the preferred policy to enable flexibility in exceptional circumstances and the housing supply has a 20% buffer to assist with delivery.

## Policy SP03 – Settlement Hierarchy

- A. Policy SP03 – Settlement Hierarchy.  
B. A review of settlements based upon recognising key facilities/services only.  
C. A review of settlements based upon the population or size of settlements.  
D. A review of settlements based upon an extended criteria range of services and facilities.

SA Objective	A.	B.	C.	D.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	+	+?	+/-?	+?
2. To maintain and improve levels of education and skills in the population overall.	+	+?	+/-?	+?
3. To reduce poverty and social exclusion and ensure access to jobs and services.	++/-	++/-?	--/+?	++/-?
4. To meet the housing requirements of the whole community.	++/-	++/-?	++/-?	++/-?
5. To conserve and enhance water quality and resources.	?	?	?	?
6. To maintain and where possible improve air quality and reduce noise pollution.	--/+	--/+?	?	--/+?
7. To conserve soil and mineral resources.	?	?	?	?
8. To promote the sustainable management of waste.	0	0	0	0
9. To reduce contribution to climate change.	+	+?	--/+?	+?
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	?	?	?	?
11. To conserve and enhance biodiversity and geodiversity.	+	+?	+	+
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	+	+?	+	+
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+	+?	+	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	+	+?	+	+
15. To revitalise the Districts' town centres.	++	++?	+/-?	++?
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	+	+?	--/+?	+

### Option A: Policy SP03 – Settlement Hierarchy

**7.47** This policy assigns each of the settlements in Babergh and Mid Suffolk Districts to one of five JLP settlement hierarchy categories:

- Ipswich Fringe
- Market Towns and Urban Areas
- Core Villages
- Hinterland Villages
- Hamlets

**7.48** Policy SP03 (Settlement Hierarchy) states that the scale and location of development will depend upon the role of settlements within the settlement hierarchy, the spatial distribution, the capacity of existing physical and social infrastructure or new/enhanced infrastructure, as well as having regard to the natural, built and historic environment. It seeks to prevent the coalescence of settlements.

**7.49** The policy states that the Ipswich Fringe settlements, Market Towns/Urban Areas and Core Villages will act as a focus for development which will be delivered through site

allocations in the JLP and/or Neighbourhood Plans, and windfall development in accordance with the relevant policies.

**7.50** The policy goes on to say that settlement boundaries have been created as defined on the Policies Map in order to demonstrate the extent of land which is required to meet the development needs and that new allocations are included within the defined settlement boundaries.

**7.51** It states that the principle of development is established within settlement boundaries, subject to the other policies in the Plan, and that outside of the defined boundaries in isolated locations development will only be permitted in exceptional circumstances.

**7.52** Finally, the policy sets out that development within the settlement boundaries will be permitted where it meets certain criteria listed in Policy SP03 (Settlement Hierarchy).

**7.53** Policy SP03 (Settlement Hierarchy) is closely linked to Policy SP04 (Housing spatial distribution) which sets out how many homes are to be delivered, as a minimum, for each settlement hierarchy category for each District. This confirms that the majority of development will take place in the Ipswich Fringe, the Market Towns and Urban Areas and Core Villages.

**7.54** As a result it will lead to significant positive effects on SA Objective 3 (Accessibility) and SA Objective 4 (Housing) as settlements higher up the hierarchy (Ipswich Fringe, Market Towns and Core Villages) are those with the most services and facilities and jobs (taking into account the proximity of the Ipswich Fringe to the regional hub of Ipswich), and where larger scale housing development is most likely to be achievable, also helping to deliver affordable housing. There is a risk, though, that some of the services and facilities in the smaller settlements lower down the hierarchy, in the Hinterland Villages and Hamlets, could find viability more of a challenge as a result, which could in particular affect the more elderly residents in these locations, and is recognised in the mixed minor negative score given against these SA Objectives.

**7.55** A significant positive effect is also recorded for SA Objective 15 (Town Centres) as the settlement hierarchy places the Market Towns at the upper end of the hierarchy, which should help to support their vitality and viability through additional development. Similarly, the settlement hierarchy should lead to development in many places in the District, as Market Towns and Urban Areas, and Core Villages, can be found throughout Babergh and Mid Suffolk, resulting in a minor positive effect on SA Objective 14 (Economy).

**7.56** Settlements higher up the hierarchy tend to be where health, sport and leisure facilities, and schools (especially secondary schools) are located, resulting in minor positive effects against SA Objective 1 (Health and Wellbeing) and SA Objective 2 (Education and Skills).

**7.57** Given that the bulk of development will be where the jobs, services and facilities, as well as public transport services are located, this will result in minor positive effects for SA Objective 9 (Climate Change Mitigation) and SA Objective 16 (Sustainable Travel).

**7.58** The constraints against development outside settlement boundaries, and the criteria based safeguards for development within the settlement boundaries, should help to deliver positive effects against SA Objective 11 (Biodiversity), SA Objective 12 (Historic Environment) and SA Objective 13 (Landscape/Townscape).

**7.59** The effects on SA Objective 5 (Water), SA Objective 7 (Soils and Minerals) and SA Objective 10 (Climate Change Adaptation) are uncertain, as these matters are not explicitly mentioned in the policy and will depend upon the particular sites coming forward, although the policy does reference the need for new/enhanced infrastructure, which could mean investment in water supply and waste water treatment, and flood defences.

**7.60** There are mixed significant negative and minor positive effects recorded for SA Objective 6 (Air and Noise) because the focus on the Ipswich Fringe and Market Towns and Urban Areas is where the AQMAs are (i.e. Sudbury and Ipswich), and therefore any additional traffic generated by development in these locations could exacerbate pollution in the AQMAs. However, the settlements in the upper end of the hierarchy are where the most jobs, services, facilities, and public transport services are, meaning that there are alternatives to use of the car, which should help to address pollution issues, resulting in a mixed minor positive effect.

#### **Option B: A review of settlements based upon recognising key facilities/services only**

**7.61** Although Option B would focus on key services and facilities only, there is no reason to expect a substantial difference from preferred Option A in terms of the effects against the SA Objectives, assuming that the key services and facilities in Ipswich are taken into account for settlements in the Ipswich Fringe.

**7.62** The settlements in the upper end of the hierarchy in Option A tend to be the ones with, or with closer access to, key services and facilities and therefore it can be expected that the effects would be similar, assuming that the same criteria based safeguards in the policy wording of Option A regarding the delivery of development would still apply. However, there is some uncertainty attached to this, which is reflected in the scoring.

### Option C: A review of settlements based upon the population or size of settlements

**7.63** If Option C were to be pursued, this would result in more homes in the Hinterland Villages and Hamlets in both Districts than under preferred Option A. In Mid Suffolk, the proportion of homes to be delivered in the Hinterland Villages and the Hamlets would be more than any of the other settlement categories. In Babergh District, the Core Villages would receive the highest proportion of development. In both Districts, the proportion to be delivered in the Ipswich Fringe would be unlikely to be as great as any of the other options, assuming that only the population or size of the settlements concerned are taken into account, rather than their proximity to Ipswich.

**7.64** There is no reason to suppose that the housing needs of Babergh and Mid Suffolk could not be met under this option although the homes may not be where they are most needed, for example in terms of addressing housing deprivation. As a result, a mixed significant positive and minor negative effect is recorded against SA Objective 3 (Housing).

**7.65** Whilst this option could have positive effects on the viability of the services and facilities in these smaller settlements, the range of services and facilities that they offer do not match those of the Market Towns and Urban Areas, or of Ipswich, especially in the Hinterland Villages and Hamlets. The Core Villages do often have more in the way of services and facilities, but not as great as the Market Towns and Urban Areas, and Ipswich. Similarly, public transport services are generally not as good.

**7.66** As a result, there could be significant negative effects against SA Objective 3 (Accessibility), SA Objective 9 (Climate Change Mitigation), and SA Objective 16 (Sustainable Travel) as residents would be more likely to drive elsewhere to access the services and facilities that they need, as well as jobs, resulting in increased carbon emissions. These effects are mixed with a minor positive effect to recognise that the support for more local services and facilities through additional development could maintain and encourage some local journeys. This option may lead to less pollution in the AQMAs of Sudbury and Ipswich, unless people resorted to their cars to access these settlements in numbers greater than the other options. Therefore, the effects against SA Objective 6 (Air and Noise) are uncertain.

**7.67** The Hinterland Villages and Hamlets are less well served by health facilities and secondary schools than the Market Towns and Urban Areas, although additional development could help to support the viability of such services and facilities resulting in mixed minor positive and minor negative effects for SA Objective 1 (Health and Wellbeing) and SA Objective 2 (Education and Skills).

**7.68** This option would be of less benefit to SA Objective 15 (Town Centres) than the other options, although the economy as a whole would probably experience similar effects as the other options for SA Objective 14 (Economy).

**7.69** It is assumed that the constraints against development outside settlement boundaries, and the criteria based safeguards for development within the settlement boundaries in Option A, would also apply to Option C. This should help to deliver minor positive effects against SA Objective 11 (Biodiversity), SA Objective 12 (Historic Environment) and SA Objective 13 (Landscape/Townscape).

**7.70** The effects on SA Objective 5 (Water), SA Objective 7 (Soils and Minerals) and SA Objective 10 (Climate Change Adaptation) are uncertain, as these matters are not mentioned in the policy and will depend upon the particular sites coming forward, and the infrastructure provided.

**7.71** All the predicted effects have considerable uncertainty attached to them.

### Option D: A review of settlements based upon an extended criteria range of services and facilities

**7.72** Although Option D would focus on a wider set of services and facilities than Option A, there is no reason to expect a substantial difference from preferred Option A in terms of the effects against the SA Objectives, assuming that the key services and facilities in Ipswich are taken into account for settlements in the Ipswich Fringe.

**7.73** The settlements in the upper end of the hierarchy in Option A tend to be the ones with, or with closer access to, the greatest range of services and facilities. Therefore, it can be expected that the effects would be similar, assuming that the same criteria based safeguards in the policy wording of Option A regarding the delivery of development would still apply. However, there is some uncertainty attached to this, which is reflected in the scoring.

### Discounted alternative options

- **Option B: A review of settlements based upon recognising key facilities/services only:** Does not recognise the differing importance of different services and facilities to communities and in reducing the need to travel
- **Option C: A review of settlements based upon the population or size of settlements:** Rural settlements of a significant size could be misrepresented if they do not have good access to key services and facilities.

- **Option D: A review of settlements based upon an extended criteria range of services and facilities:** Would be unlikely to distinguish any significantly greater sustainability characteristics.

## Policy SP04 – Housing Spatial Distribution

A. Policy SP04 – Housing Spatial Distribution.

B & C. Reasonable alternatives – see commentary below.

### Preferred approach

**7.74** The spatial strategy for housing, as presented in Policy SP04 (Housing Spatial Distribution) reflects a combination of factors:

- The findings of the SA of the Spatial Strategy Options presented in **Chapter 5 (Sustainability Appraisal Findings for the Spatial Strategy Options)** of this SA Report.
- Evidence base studies such as analysis of the sensitivities and constraints of the area (e.g. flood zones, heritage features and landscape sensitivity, etc) and the infrastructure capacity and opportunities (e.g. schools, healthcare, water supply and treatment, etc).
- Extant planning permissions, and the availability and deliverability of sites through the Strategic Housing and Economic Land Availability Assessment (SHELAA) process.
- Views received from consultation responses during earlier stages of the JLP preparation process.

**7.75** Policy SP04 sets out the distribution of housing across the two Districts, split into each of the settlement hierarchy categories, plus an allowance for windfall sites coming forward.

**7.76** The effects of each individual site allocation in the JLP are presented later in this SA Report. The effects of Policy SP04 focus on the principles of the spatial distribution, drawing on the SA of the Spatial Strategy Options presented in **Chapter 5 (Sustainability Appraisal Findings for the Spatial Strategy Options)** of this SA Report, as well as broad patterns of distribution of site allocations at the settlement level.

**7.77** Although Policy SP04 is a single policy, the spatial distribution is presented separately in the policy for each District, and therefore the appraisal has also been undertaken separately.

**7.78** It should be noted that Policy SP04 requires designated Neighbourhood Plans to deliver the minimum housing requirements as set out for each Neighbourhood Plan area. The housing numbers in the table below Policy SP04 represent the outstanding planning permissions granted as of 1 April 2018. As these already have planning consent, the

housing numbers for each Neighbourhood Plan area have not been subject to further appraisal in this SA Report.

### Reasonable alternatives

**7.79** A significant volume of the proposed new housing supply up to 2037 has already been identified through consented schemes (both pre-Plan base date and proposed allocations). These are considered fixed as far as the spatial distribution goes. Therefore, a residual housing number of approximately 3,500 dwellings (Babergh) and 4,400 dwellings (Mid Suffolk) is what is realistically outstanding for the JLP. The reasonable alternatives for Policy SP04 are therefore quite limited.

**7.80** The SA appraised nine high level spatial distribution options (**Chapter 5 (Sustainability Appraisal Findings for the Spatial Strategy Options)**). However, it identified that the expected sustainability performance of some of those options was very similar. Further optioneering work by BMSDC on the outstanding spatial distribution has therefore concentrated on options which can be expected to perform as genuinely distinct. This left the following SA spatial options from which reasonable alternatives could be considered:

- Option 1 – Ipswich Fringe focus (one further option identified).
- Option 2 – Focusing development at Market Towns and Urban Areas (two further options identified).
- Option 4 – Proportionate growth (one further option identified).
- Option 9 – Focus on least environmentally constrained areas (no reasonable options identified).

**7.81** In order to consider the locational potential for the above residual dwellings numbers to be found within the JLP, regard has been had to the SHELAA for residual site opportunities (without consented schemes). In the SA of Spatial Strategy Options (**Chapter 5 (Sustainability Appraisal Findings for the Spatial Strategy Options)**), the SA identified that the most sustainable settlement categories are the Market Towns and Urban Areas, followed by the Ipswich Fringe and Core Villages. This is representative of the Settlement Hierarchy within the JLP. However, no one settlement category alone has the potential to meet the whole District residual housing target. It is estimated that the residual SHELAA capacity by settlement category for each of the Districts is as follows:

**Table 7.2: SHELAA capacity by settlement category for Babergh**

JLP settlement category	Estimated residual dwellings capacity	% of residual housing supply achievable for each settlement category
Ipswich Fringe	2,300	66%
Market Towns and Urban Areas	2,100	60%
Core Villages	1,200	34%
Hinterland Villages	300	9%
Hamlets	200	6%

BMSDC

**Table 7.3: SHELAA capacity by settlement category for Mid Suffolk**

JLP settlement category	Estimated residual dwellings capacity	% of residual housing supply achievable for each settlement category
Ipswich Fringe	1,100	25%
Market Towns and Urban Areas	2,100	48%
Core Villages	2,500	57%
Hinterland Villages	400	9%
Hamlets	200	5%

BMSDC

**7.82** It is unlikely to be practical or sustainable to allocate every single SHELAA site in a particular settlement hierarchy category, and therefore each of the settlement hierarchy categories might be expected to make a contribution to the residual supply. Noting the respective District spatial capacity potential to meet residual housing supply, the reasonable alternatives to Policy SP04 were identified as below:

**Option 1 – Ipswich Fringe focus**

- Babergh - Policy SP04 Alternative B – Growth in the Ipswich Fringe could be focussed with 60% of the residual supply, with 25% in Urban areas and Market Towns, 10% in Core Villages and 2.5% in both the Hinterland villages and Hamlet villages.
- Mid Suffolk – No reasonable alternative is achievable as there is a lack of residual capacity in the Ipswich Fringe to support an Ipswich focussed approach.

**Option 2 – Focusing development at Market Towns and Urban Areas**

- Babergh – Policy SP04 Alternative C – The Market Towns and Urban Areas are assessed as having high sustainability characteristics and are also concentrations for employment areas. Growth in the Ipswich Fringe could be 20% of the residual supply, with 60% in Urban Areas and Market Towns, 15% in Core Villages and 2.5% in both the Hinterland villages and Hamlet villages.
- Mid Suffolk – Policy SP04 Alternative B - The Market Towns and Urban Areas are assessed as having high sustainability characteristics and are also concentrations for employment areas. Growth in the Ipswich Fringe could be 25% of the residual supply, with 48% in Urban Areas and Market Towns, 22% in Core Villages and 2.5% in both the Hinterland villages and Hamlet villages.

**Option 4 – Proportionate growth**

- Babergh – No reasonable alternative is achievable as there is not the range of residual capacity across the three most sustainable categories (Ipswich Fringe, Market Towns and Urban Areas, Core Villages) to ensure that residual allocated growth is proportionate to the housing stock. For example, Core Villages represent 55% of the total housing stock of the three most sustainable categories, which would require capacity for at least 1,800 dwellings (with only 1,200 available).
- Mid Suffolk – Policy SP04 Alternative C - Based upon the proportionate housing stock of the three most sustainable categories (Ipswich Fringe, Market Towns and Urban Areas and Core Villages), then proportionate residual growth could be allocated as 13% Ipswich Fringe, 48% Urban Areas and Market Towns, 34% Core Villages and 2.5% in both the Hinterland villages and Hamlet villages.

**Option 9 – Focus on least environmentally constrained areas**

- No reasonable alternative is achievable as there is a lack of residual capacity in the areas identified of least environmental constraint which are typically more sparse rural areas. This option also scored poorly at conceptual level reflecting that sparse rural areas are where facilities and services are more limited.

**7.83** In summary, and taking into account existing commitments, these provide the following reasonable alternatives.

**Table 7.4: Reasonable alternative housing spatial distributions for Babergh**

JLP settlement category	A. JLP Policy SP04	B. Ipswich Fringe focus	C. Market Towns and Urban Areas focus
Ipswich Fringe	2,046 (21%)	3,000 (31%)	1,500 (16%)
Market Towns and Urban Areas	3,161 (33%)	2,700 (28%)	4,000 (42%)
Core Villages	2,699 (28%)	2,200 (23%)	2,400 (25%)
Hinterland Villages	866 (9%)	900 (9%)	900 (9%)
Hamlets and Countryside	339 (4%)	300 (3%)	300 (3%)
Windfall	500 (5%)	500 (5%)	500 (5%)
<b>Total</b>	<b>9,611</b>	<b>9,600</b>	<b>9,600</b>

% may not sum to 100% due to rounding

**Table 7.5: Reasonable alternative housing spatial distributions for Mid Suffolk**

JLP settlement category	A. JLP Policy SP04	B. Market Towns and Urban Areas focus	C. Proportionate Growth
Ipswich Fringe	1,718 (14%)	2,000 (16%)	1,500 (12%)
Market Towns and Urban Areas	3,966 (31%)	4,700 (37%)	4,700 (37%)
Core Villages	4,761 (38%)	4,000 (32%)	4,500 (36%)
Hinterland Villages	1,267 (10%)	1,100 (9%)	1,100 (9%)
Hamlets and Countryside	404 (3%)	400 (3%)	400 (3%)
Windfall	500 (4%)	500 (4%)	500 (4%)
<b>Total</b>	<b>12,616</b>	<b>12,600</b>	<b>12,600</b>

% may not sum to 100% due to rounding

### Babergh District

SA Objective	A.	B.	C.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	++/-	++/-	++/-
2. To maintain and improve levels of education and skills in the population overall.	++/-	++/-	++/-
3. To reduce poverty and social exclusion and ensure access to jobs and services.	++/-	++/-	++/-
4. To meet the housing requirements of the whole community.	++	++/-	++/-
5. To conserve and enhance water quality and resources.	-	-	-
6. To maintain and where possible improve air quality and reduce noise pollution.	--/+	--/+	--/+
7. To conserve soil and mineral resources.	--/+	--/+	--/+
8. To promote the sustainable management of waste.	N/A	N/A	N/A
9. To reduce contribution to climate change.	++/-	++/-	++/-
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	-	-	-
11. To conserve and enhance biodiversity and geodiversity.	--?	--?	--?
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	-?	-?	-?
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	-	-	-
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	++/-	+/-	++/-
15. To revitalise the Districts' town centres.	++/-	+/-	++

SA Objective	A.	B.	C.
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	++/-	++/-	++/-

### Babergh Option A: Policy SP04 – Housing Spatial Distribution

**7.84** Under Policy SP04 for Babergh the greatest proportion of additional homes (33%) will be delivered at the Market Towns and Urban Areas, followed by the Core Villages (28%) and the Ipswich Fringe (21%). The Hinterland Villages and Hamlets will receive a much smaller proportion (13% in total).

**7.85** However, to put this into context, it is important to understand what this means at a settlement level. On average, the following numbers of dwellings would be delivered per settlement in each of the settlement categories.

**Table 7.6: Average number of additional dwellings per settlement in Babergh under Policy SP04**

JLP settlement category	Number of settlements as per Policy SP03	Total dwellings as per Policy SP04	Average number of dwellings per settlement
Ipswich Fringe	6	2,046	341
Market Towns and Urban Areas	3	3,161	1,054
Core Villages	13	2,699	208
Hinterland Villages	23	866	38
Hamlets	74	339	5
Windfalls	N/A	500	N/A

Note: Villages in the Ipswich Policy Area are included in the figures for the Ipswich Policy Area. In the settlement hierarchy, some settlements have been divided into more than one component part – each is treated separately in the figures in this table. Great Cornard is included as part of the Market Town of Sudbury rather than as a separate Core Village.

**7.86** This shows that the Market Towns and Urban Areas on an average basis will receive significantly more dwellings than the Ipswich Fringe settlements and Core Villages. For the Hinterland Villages the number of dwellings to be delivered per annum over the Plan period is on average two dwellings per settlement. For the Hamlets, on average each settlement will receive one new dwelling every four years. Windfalls could increase these amounts but not significantly.

**7.87** In practice, some settlements within each settlement category are likely to receive more housing than others (e.g. in the Ipswich Fringe, Sproughton is the focus of development in the JLP, and of the Core Villages, Capel St Mary would

receive significantly more dwellings than the other Core Villages in Babergh). Although individual settlements are not identified in Policy SP04, the averages indicate that there are significant differences between the amount of housing that a settlement might expect to receive depending upon which settlement category it is in.

**7.88** It is also helpful to understand how the pattern of housing stock is likely to change as a result of Policy SP04 from the beginning to the end of the Plan period.

**Table 7.7: Babergh estimated housing stock at the beginning and end of the Plan period under Policy SP04**

Settlement hierarchy category	Estimated housing stock at the beginning of the Plan period	% of total housing stock at the beginning of the Plan period	Estimated housing stock at the end of the Plan period	% of total housing stock at the end of the Plan period
Ipswich Fringe	3,270	8%	5,316	11%
Market Towns and Urban Areas	10,267	25%	13,428	27%
Core Villages	16,673	41%	19,372	39%
Hinterland Villages	6,352	16%	7,218	14%
Hamlets	4,268	10%	4,607	9%
<b>Total</b>	<b>40,830</b>	<b>100%</b>	<b>49,941</b>	<b>100%</b>

BMSDC (Note: ignores windfall provision)

**7.89** This shows that, under Policy SP04, there is a small but discernible shift in the total housing stock during the course of the Plan period, particularly towards the Ipswich Fringe and Market Towns and Urban Areas. The Hinterland Villages and Hamlets, on the other hand, show a reduction in the proportion of the total housing stock at the end of the Plan period. For these categories in the settlement hierarchy, this is in line with the conclusions of the SA of the Spatial Strategy Options. However, the overall proportion of the housing stock at the Core Villages reduces over the Plan period, and the increase in the housing stock is greatest in the Ipswich Fringe as opposed to the Market Towns and Urban Areas, albeit from a much lower base.

**7.90** Policy SP04 (Housing Spatial Distribution) will result in significant positive effects for SA Objective 4 (Housing), because the spatial distribution will allow for homes to be delivered across a range of settlements in Babergh District.

**7.91** Significant positive effects are also recorded against SA Objective 1 (Health and Wellbeing), SA Objective 2 (Education and Skills), SA Objective 3 (Accessibility), SA Objective 9 (Climate Change Mitigation) and SA Objective 16 (Sustainable Travel). This is because by far the greatest proportion of development will go to the Market Towns and Urban Areas, Ipswich Fringe and Core Villages, which is where the jobs, services and facilities are concentrated in Babergh and in neighbouring Ipswich, and these locations are the best served by public transport. This should result in shorter journeys or less need to use private vehicles, thereby reducing carbon emissions. However, these significant positive effects are mixed with a minor negative effect because the Core Villages do not offer the range of jobs, services and facilities as close to hand as the Market Towns and Urban Areas, and some development will still take place in Hinterland Villages and Hamlets that generally tend not to be so well served. For similar reasons, a mixed significant positive and minor negative effect is recorded for SA Objective 14 (Economic Growth) and SA Objective 15 (Town Centres). On the other hand, the Ipswich Fringe in Babergh offers an opportunity to deliver a significant amount of housing on the edge of the regionally important town of Ipswich, which offers a concentration of jobs, services and facilities, and the potential for regeneration on the edge of the town.

**7.92** Significant negative effects are recorded for SA Objective 6 (Air and Noise), SA Objective 7 (Soils and Minerals) and SA Objective 11 (Biodiversity). The significant negative effect for SA Objective 6 (Air and Noise) reflects that the focus on the Ipswich Fringe and Market Towns and Urban Areas, which is where the AQMAs are (i.e. Sudbury and Ipswich), and therefore any additional traffic generated by development in these locations could exacerbate pollution in the AQMA areas. However, by focusing development in those parts of the District that have the most jobs, services and facilities, and best public transport services, means that there are alternatives to use of the car, resulting in a mixed minor positive effect.

**7.93** With respect to SA Objective 7 (Soils and Minerals), the significant negative effect is in recognition of the extensive areas of Grade 2 agricultural land in the District as well as Grade 3 agricultural land, some of which could have the potential to be Grade 3a, representing best and most versatile agricultural land. Such land can be found close to the Market Towns and Urban Areas as well as in the Ipswich Fringe and some of the Core Villages. However, the focus on the main settlements in the District provides an opportunity to develop brownfield land, resulting in a mixed minor positive effect.

**7.94** For SA Objective 11 (Biodiversity) the significant negative effect reflects not only designated biodiversity assets that can be found close to the main areas of development, but also the potential harm to supporting habitats and ecological networks. However, the significant effects are uncertain, because there may well be considerable scope to avoid harm to ecological assets and to incorporate biodiversity improvements in development.

**7.95** For all other SA Objectives, the effects of the spatial distribution are considered to be minor.

**7.96** It should be noted that the actual effects will depend upon which sites are allocated, and that many of the effects are more easily identified and evaluated at the site level.

#### Babergh Option B: Ipswich Fringe Focus

**7.97** Under Option B for Babergh the greatest proportion of additional homes (31%) would be delivered in the Ipswich Fringe, followed by the Market Towns and Urban Areas (28%), and the Core Villages (23%). The Hinterland Villages and Hamlets would receive similar amounts of housing as Policy SP04 (12% in total).

**7.98** On average, this means that the following numbers of dwellings would be delivered per settlement in each of the settlement categories.

**Table 7.8: Average number of additional dwellings per settlement in Babergh under Option B**

JLP settlement category	Number of settlements as per Policy SP03	Total dwellings under Option B	Average number of dwellings per settlement
Ipswich Fringe	6	3,000	500
Market Towns and Urban Areas	3	2,700	900
Core Villages	13	2,200	169
Hinterland Villages	23	900	39
Hamlets	74	300	4
Windfalls	N/A	500	N/A

Note: Villages in the Ipswich Policy Area are included in the figures for the Ipswich Policy Area. In the settlement hierarchy, some settlements have been divided into more than one component part – each is treated separately in the figures in this table. Great Comard is included as part of the Market Town of Sudbury rather than as a separate Core Village.

**7.99** This shows that the Market Towns and Urban Areas on an average basis would also receive significantly more dwellings than the Ipswich Fringe settlements and Core

Villages, although not to the same degree as Option A. For the Hinterland Villages and the Hamlets there would be little difference compared to Policy SP04.

**7.100** The overall pattern of housing stock under Option B would change from the beginning to the end of the Plan period as follows:

**Table 7.9: Babergh District estimated housing stock at the beginning and end of the Plan period under Option B**

Settlement hierarchy category	Estimated housing stock at the beginning of the Plan period	% of total housing stock at the beginning of the Plan period	Estimated housing stock at the end of the Plan period	% of total housing stock at the end of the Plan period
Ipswich Fringe	3,270	8%	6,270	13%
Market Towns and Urban Areas	10,267	25%	12,967	26%
Core Villages	16,673	41%	18,873	38%
Hinterland Villages	6,352	16%	7,252	15%
Hamlets	4,268	10%	4,568	9%
<b>Total</b>	<b>40,830</b>	<b>100%</b>	<b>49,930</b>	<b>101%</b>

BMSDC (Note: ignores windfall provision)

**7.101** This shows that the most significant shift in housing stock as a proportion of the total housing stock would be towards the Ipswich Fringe. The overall proportion of housing stock in the Market Towns and Urban Areas, Hinterland Villages and Hamlets would remain approximately the same. The housing stock in the Core Villages as a proportion of total housing stock would reduce, although not by a great deal.

**7.102** Given that the differences in the spatial distribution between Option B and Policy SP04 are not that great, particularly in terms of the overall changes in the total housing stock by settlement hierarchy category, many of the effects identified for Policy SP04 are the same for Option B.

**7.103** Differences have been identified with respect to SA Objective 4 (Housing), SA Objective 14 (Economic Growth) and SA Objective 15 (Town Centres). Although Option B would make even greater use of the opportunity to deliver homes close to Ipswich, which is the main regional centre of jobs, services and facilities, and also a commuting destination of many residents in Babergh, this would mean that fewer homes are delivered elsewhere in Babergh, particularly in the Market Towns and Core Villages, and do less to address

issues of affordability across the District, resulting in mixed significant positive and minor negative effects on SA Objective 4 (Housing). Option B could also provide less support for the local economy of these settlements and their town centres, resulting in mixed minor positive and minor negative effects on SA Objective 14 (Economic Growth) and SA Objective 15 (Town Centres).

**7.104** It should be noted that the actual effects will depend upon which sites would be allocated under this option, given that many of the effects are more easily identified and evaluated at the site level. This is addressed in **Chapter 6 (Sustainability Appraisal of Reasonable Alternative Sites)** of this SA Report.

#### Babergh Option C: Market Towns and Urban Areas focus

**7.105** Under Option C for Babergh the greatest proportion of additional homes (42%) would be delivered in the Market Towns and Urban Areas, followed by the Core Villages (25%) and Ipswich Fringe (16%). The Hinterland Villages and Hamlets would receive similar amounts of housing as Preferred Option A (12% in total).

**7.106** On average, this means that the following numbers of dwellings would be delivered per settlement in each of the settlement categories.

**Table 7.10: Average number of additional dwellings per settlement in Babergh under Option C**

JLP settlement category	Number of settlements as per Policy SP03	Total dwellings under Option C	Average number of dwellings per settlement
Ipswich Fringe	6	1,500	250
Market Towns and Urban Areas	3	4,000	1,333
Core Villages	13	2,400	185
Hinterland Villages	23	900	39
Hamlets	74	300	4
Windfalls	N/A	500	N/A

Note: Villages in the Ipswich Policy Area are included in the figures for the Ipswich Policy Area. In the settlement hierarchy, some settlements have been divided into more than one component part – each is treated separately in the figures in this table. Great Comard is included as part of the Market Town of Sudbury rather than as a separate Core Village.

**7.107** This shows that the Market Towns and Urban Areas would also receive far higher numbers of dwellings on average than the Ipswich Fringe settlements and Core Villages. For the

Hinterland Villages and the Hamlets there would be little difference compared to Policy SP04.

**7.108** The overall pattern of housing stock under Option B would change from the beginning to the end of the Plan period as follows:

**Table 7.11: Babergh District estimated housing stock at the beginning and end of the Plan period under Option C**

Settlement hierarchy category	Estimated housing stock at the beginning of the Plan period	% of total housing stock at the beginning of the Plan period	Estimated housing stock at the end of the Plan period	% of total housing stock at the end of the Plan period
Ipswich Fringe	3,270	8%	4,770	10%
Market Towns and Urban Areas	10,267	25%	14,267	29%
Core Villages	16,673	41%	19,037	38%
Hinterland Villages	6,352	16%	7,252	15%
Hamlets	4,268	10%	4,568	9%
<b>Total</b>	<b>40,830</b>	<b>100%</b>	<b>49,930</b>	<b>101%</b>

BMSDC (Note: ignores windfall provision)

**7.109** This shows that the most significant shift in housing stock as a proportion of the total housing stock would be towards the Market Towns and Urban Areas. The overall proportion of housing stock in the Ipswich Fringe would also increase, but not to the same degree, and the proportion of the housing stock in the Core Villages would reduce. The proportion of the housing stock in the Hinterland Villages and Hamlets would remain approximately the same.

**7.110** Given that the SA of the Spatial Strategy Options in **Chapter 5 (Sustainability Appraisal Findings for the Spatial Strategy Options)** concluded that the Market Towns and Urban Areas would be the most sustainable locations to focus development and it might be expected that Option C would fare particularly well against the SA Objectives. In

practice, though, Policy SP04 already focuses far more development at the Market Towns and Urban Areas, on an average number of homes per settlement basis, and the difference in concentrating even more homes on the Market Towns and Urban Areas is unlikely to be that great, given the numbers involved. This is illustrated in particular by the changes in the total housing stock at the end of the Plan period which show a shift to the Market Towns and Urban Areas, but not one that is significantly different to Policy SP04. As a result, many of the effects identified for Policy SP04 are the same for Option C.

**7.111** Differences have been identified with respect to SA Objective 4 (Housing) and SA Objective 15 (Town Centres). Although Option C would concentrate more homes at the Market Towns and Urban Areas, this would mean fewer homes elsewhere, including the Ipswich Fringe (which is an important commuting destination for residents of Babergh) and the Core Villages. This in turn might mean that there is less opportunity for people living where they wish to live, and that the smaller amount of housing outside the Market Towns and Urban Areas may result in there being less opportunity to address affordability issues outside of these settlements. As a result, it is anticipated that Option C would result in a mixed significant positive and minor negative effects on SA Objective 4 (Housing).

**7.112** On the other hand, focusing even more development at the Market Towns and Urban Areas would be likely to provide even greater support for their town centres, resulting in a significant positive effect against SA Objective 15 (Town Centres), with less of the minor negative effects identified for the other two options.

**7.113** With the exception of these two SA Objectives, the effects of Option C are likely to be similar to those of Policy SP04.

**7.114** It should be noted that the actual effects will depend upon which sites would be allocated under this option, given that many of the effects are more easily identified and evaluated at the site level. This is addressed in **Chapter 6 (Sustainability Appraisal of Reasonable Alternative Sites)** of this SA Report.

### Discounted alternative options (Babergh)

**Option B: Ipswich Fringe focus:** This alternative spatial pattern is discounted as the proposed policy distribution is considered the most balanced and appropriate mix accounting for the availability and deliverability of sites, the sensitivities and constraints of the area, and the infrastructure capacity and opportunities.

**Option C: Market Towns and Urban Areas focus:** This alternative spatial pattern is discounted as the proposed policy distribution is considered the most balanced and appropriate mix accounting for the availability and deliverability of sites, the sensitivities and constraints of the area, and the infrastructure capacity and opportunities.

### Mid Suffolk District

SA Objective	A.	B.	C.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	++/-	++/-	++/-
2. To maintain and improve levels of education and skills in the population overall.	++/-	++/-	++/-
3. To reduce poverty and social exclusion and ensure access to jobs and services.	++/-	++/-	++/-
4. To meet the housing requirements of the whole community.	++	++/-	++/-
5. To conserve and enhance water quality and resources.	-	-	-
6. To maintain and where possible improve air quality and reduce noise pollution.	--/+	--/+	--/+
7. To conserve soil and mineral resources.	--/+	--/+	--/+
8. To promote the sustainable management of waste.	N/A	N/A	N/A
9. To reduce contribution to climate change.	++/-	++/-	++/-
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	-	-	-
11. To conserve and enhance biodiversity and geodiversity.	--?	--?	--?
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	-?	-?	-?
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	-	-	-
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	++/-	++/-	++/-
15. To revitalise the Districts' town centres.	++/-	++	++
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	++/-	++/-	++/-

### Mid Suffolk Option A: Policy SP04 – Housing Spatial Distribution

**7.115** Under Policy SP04 for Mid Suffolk the greatest proportion of additional homes (33%) will be delivered at the Market Towns and Urban Areas, followed by the Core Villages (28%) and the Ipswich Fringe (21%). The Hinterland Villages and Hamlets will receive a much smaller proportion (13% in total).

**7.116** On average, this means that the following numbers of dwellings would be delivered per settlement in each of the settlement categories.

**Table 7.12: Average number of additional dwellings per settlement in Mid Suffolk under Policy SP04**

JLP settlement category	Number of settlements as per Policy SP03	Total dwellings as per Policy SP04	Average number of dwellings per settlement
Ipswich Fringe	7	1,718	245
Market Towns and Urban Areas	3	3,966	1,322
Core Villages	11	4,761	433
Hinterland Villages	40	1,267	32

JLP settlement category	Number of settlements as per Policy SP03	Total dwellings as per Policy SP04	Average number of dwellings per settlement
Hamlets	86	404	5
Windfalls	N/A	500	N/A

Note: Villages in the Ipswich Policy Area are included in the figures for the Ipswich Policy Area. In the settlement hierarchy, some settlements have been divided into more than one component part – each is treated separately in the figures in this table.

**7.117** This shows that the Market Towns and Urban Areas on an average basis will receive significantly more dwellings than the Ipswich Fringe settlements and Core Villages. This is a similar pattern to Babergh under Policy SP04, although in Mid Suffolk, on average each Core Village will receive more dwellings than each of the Ipswich Fringe settlements – in Babergh it is the other way round. As with Babergh, in the Hinterland Villages the number of dwellings to be delivered per annum over the Plan period is on average two dwellings per settlement. For the Hamlets, on average each settlement will receive one new dwelling every four years. Windfalls could increase these amounts but not significantly.

**7.118** In practice, some settlements within each settlement category are likely to receive more housing than others (e.g. of the Market Towns and Urban Areas, Stowmarket would receive far more dwellings than any other of the settlements in this category, of the Core Villages, Thurston and Woolpit and to a certain extent Elmswell would receive the most homes, and Bramford would receive the most homes in the Ipswich Fringe). Although individual settlements are not identified in Policy SP04, the averages indicate that there are significant differences between the amount of housing that a settlement might expect to receive depending upon which settlement category it is in.

**7.119** The overall pattern of housing stock is likely to change as a result of Policy SP04 from the beginning to the end of the Plan period as follows:

**Table 7.13: Mid Suffolk estimated housing stock at the beginning and end of the Plan period under Policy SP04**

Settlement hierarchy category	Estimated housing stock at the beginning of the Plan period	% of total housing stock at the beginning of the Plan period	Estimated housing stock at the end of the Plan period	% of total housing stock at the end of the Plan period
Ipswich Fringe	3.557	8%	5.725	10%
Market Towns	12.721	28%	16.687	29%

Settlement hierarchy category	Estimated housing stock at the beginning of the Plan period	% of total housing stock at the beginning of the Plan period	Estimated housing stock at the end of the Plan period	% of total housing stock at the end of the Plan period
and Urban Areas				
Core Villages	10,229	23%	14,990	26%
Hinterland Villages	11,014	24%	12,281	21%
Hamlets	7,647	17%	8,051	14%
<b>Total</b>	<b>45,168</b>	<b>100%</b>	<b>57,734</b>	<b>100%</b>

BMSDC (Note: ignores windfall provision)

**7.120** This shows that there is a small but discernible shift in the total housing stock during the course of the Plan period, particularly towards the Ipswich Fringe and Core Villages. The proportion of housing stock at the Market Towns and Urban Areas will also increase but not by as much. The Hinterland Villages and Hamlets, on the other hand, show a marked reduction in the proportion of the total housing stock at the end of the Plan period.

**7.121** For these categories in the settlement hierarchy, this is in line with the conclusions of the SA of the Spatial Strategy Options. However, the overall proportion of the total housing stock at the Core Villages reduces over the Plan period, and the increase in the housing stock is greatest in the Ipswich Fringe as opposed to the Market Towns and Urban Areas, albeit from a much lower base.

**7.122** The spatial distribution for Mid Suffolk is similar to that of Babergh, in that it focuses the bulk of new housing development at the Ipswich Fringe, Market Towns and Urban Areas, and Core Villages. However, whereas the proportion of new homes to be delivered at the Market Towns and Urban Areas is similar to Babergh District, greater emphasis is placed on the Core Villages than the Ipswich Fringe. Nonetheless, the predicted effects of the spatial distribution for Mid Suffolk mirror those for Babergh.

**7.123** Policy SP04 (Housing Spatial Distribution) will result in significant positive effects on SA Objective 4 (Housing), because the spatial distribution will allow for homes to be delivered across a range of settlements in Mid Suffolk District, in accordance with the settlement hierarchy.

**7.124** Significant positive effects are also recorded against SA Objective 1 (Health and Wellbeing), SA Objective 2 (Education and Skills), SA Objective 3 (Accessibility), SA Objective 9 (Climate Change Mitigation) and SA Objective 16 (Sustainable Travel). This is because by far the greatest proportion of

development will go to the Market Towns and Urban Areas, Ipswich Fringe and Core Villages, which is where the jobs, services and facilities are concentrated in Mid Suffolk and in neighbouring Ipswich, and these locations are the best served with public transport. This should result in shorter journeys or less need to use private vehicles, thereby reducing carbon emissions. However, these are mixed with a minor negative effect because the Ipswich Fringe and Core Villages do not offer the range of jobs, services and facilities close to hand of the Market Towns and Urban Areas, and because there is some development that will still take place in Hinterland Villages and Hamlets that generally tend not to be so well served. For similar reasons, a mixed significant positive and minor negative effect is recorded for SA Objective 14 (Economic Growth) and SA Objective 15 (Town Centres).

**7.125** Significant negative effects are recorded for SA Objective 6 (Air and Noise), SA Objective 7 (Soils and Minerals) and SA Objective 11 (Biodiversity). The significant negative effect for SA Objective 6 (Air and Noise) reflects that the focus on the Ipswich Fringe and Market Towns and Urban Areas to a large extent follows the A14 corridor, which is where the main sources of air pollution and noise are in the District, with Bury St Edmunds to the west and Ipswich to the East, both important commuting destinations for residents of Mid Suffolk, having AQMAs. Therefore, any additional traffic generated by development in these locations could exacerbate pollution in the AQMA areas, as well as along the A14 corridor together with noise. However, by focusing development in those parts of the District that have the most jobs, services and facilities, and best public transport services, means that there are alternatives to use of the car, resulting in a mixed minor positive effect.

**7.126** With respect to SA Objective 7 (Soils and Minerals), the significant negative effect is in recognition of the extensive areas of Grade 2 agricultural land in the District as well as Grade 3 agricultural land, some of which could have the potential to be Grade 3a, representing best and most versatile agricultural land. Such land can be found close to the Market Towns and Urban Areas as well as in the Ipswich Fringe and some of the Core Villages. However, the focus on the main settlements in the District provides an opportunity to develop brownfield land, resulting in a mixed minor positive effect.

**7.127** For SA Objective 11 (Biodiversity), although the biodiversity designations in Mid Suffolk are less extensive than in Babergh, there is a particular concentration of locally designated biodiversity sites along the A14 corridor, which links the Ipswich Fringe with several of the Market Towns and Core Villages in Mid Suffolk. The significant negative effect reflects not only designated biodiversity assets that can be found close to the main areas of development, but also the potential harm to supporting habitats and ecological networks. However, the significant effects are uncertain, because there

may well be considerable scope to avoid harm to ecological assets and to incorporate biodiversity improvements in development.

**7.128** For all other SA Objectives, the effects of the spatial distribution are considered to be minor.

**7.129** It should be noted that the actual effects will depend upon which sites are allocated, and that many of the effects are more easily identified and evaluated at the site level.

#### Mid Suffolk Option B: Market Town and Urban Areas focus

**7.130** Under Option B for Mid Suffolk the greatest proportion of additional homes (37%) would be delivered at the Market Towns and Urban Areas, followed by the Core Villages (32%) and the Ipswich Fringe settlements (16%). The Market Towns and Urban Areas and the Ipswich Fringe would receive more homes than under Policy SP04, and the Core Villages fewer. The Hinterland Villages and Hamlets would receive similar amounts of housing as Policy SP04 (12% in total).

**7.131** On average, this means that the following numbers of dwellings would be delivered per settlement in each of the settlement categories.

**Table 7.14: Average number of additional dwellings per settlement in Mid Suffolk under Option B**

JLP settlement category	Number of settlements as per Policy SP03	Total dwellings under Option B	Average number of dwellings per settlement
Ipswich Fringe	7	2,000	286
Market Towns and Urban Areas	3	4,700	1,567
Core Villages	11	4,000	364
Hinterland Villages	40	1,100	28
Hamlets	86	400	5
Windfalls	N/A	500	N/A

Note: Villages in the Ipswich Policy Area are included in the figures for the Ipswich Policy Area. In the settlement hierarchy, some settlements have been divided into more than one component part – each is treated separately in the figures in this table.

**7.132** This shows that the Market Towns and Urban Areas would receive even more dwellings on average than the Ipswich Fringe settlements and Core Villages compared to Policy SP04. The number of dwellings on average in the Ipswich Fringe settlements would also increase but the number of dwellings in the Core Villages on average would

decrease. For the Hinterland Villages and the Hamlets there would be little difference compared to Policy SP04.

**7.133** The overall pattern of housing stock is likely to change as a result of Policy SP04 from the beginning to the end of the Plan period as follows:

**Table 7.15: Mid Suffolk District estimated housing stock at the beginning and end of the Plan period under Option B**

Settlement hierarchy category	Estimated housing stock at the beginning of the Plan period	% of total housing stock at the beginning of the Plan period	Estimated housing stock at the end of the Plan period	% of total housing stock at the end of the Plan period
Ipswich Fringe	3,557	8%	5,557	10%
Market Towns and Urban Areas	12,721	28%	17,421	30%
Core Villages	10,229	23%	14,229	25%
Hinterland Villages	11,014	24%	12,114	21%
Hamlets	7,647	17%	8,047	14%
<b>Total</b>	<b>45,168</b>	<b>100%</b>	<b>57,368</b>	<b>100%</b>

BMSDC (Note: ignores windfall provision)

**7.134** Although in terms of the distribution of additional dwellings to be delivered under Option B for Mid Suffolk varies from Policy SP04, the overall difference in effect in terms of the proportion of the total housing stock in each settlement category is not very marked. There is a slight shift from the Core Villages to the Market Towns and Urban Areas, but otherwise the housing stock distribution at the end of the Plan period would be similar to that achieved under Policy SP04.

**7.135** Given that the SA of the Spatial Strategy Options in **Chapter 5** concluded that the Market Towns and Urban Areas would be the most sustainable locations to focus development it might be expected that Option B would fare particularly well against the SA Objectives. In practice, though, Policy SP04 already focuses far more development at the Market Towns and Urban Areas, on an average number of homes per settlement basis, and the difference in concentrating even more homes on the Market Towns and Urban Areas is unlikely to be that great, given the numbers involved. This is illustrated in particular by the changes in the total housing stock at the end of the Plan period which show a shift to the Market Towns and Urban Areas, but not one that is significantly different to

Policy SP04. As a result, many of the effects identified for Policy SP04 are the same for Option B.

**7.136** Differences have been identified with respect to SA Objective 4 (Housing) and SA Objective 15 (Town Centres). Although Option B would concentrate more homes at the Market Towns and Urban Areas, this would mean fewer homes at the Core Villages. This in turn might mean that there is less opportunity for people living where they wish to live, and that the smaller amount of housing outside the Market Towns and Urban Areas may result in there being less opportunity to address affordability issues outside of these settlements. As a result, it is anticipated that Option B would result in a mixed significant positive and minor negative effect on SA Objective 4 (Housing).

**7.137** On the other hand, focusing even more development at the Market Towns and Urban Areas would be likely to provide even greater support for their town centres, resulting in a significant positive effect against SA Objective 15 (Town Centres), with less of the minor negative effects identified for the other two options.

**7.138** With the exception of these two SA Objectives, the effects of Option B are likely to be similar to those of Policy SP04.

**7.139** It should be noted that the actual effects will depend upon which sites would be allocated under this option, given that many of the effects are more easily identified and evaluated at the site level. This is addressed in **Chapter 6 (Sustainability Appraisal of Reasonable Alternative Sites)** of this SA Report.

#### Mid Suffolk Option C: Proportionate Growth

**7.140** Under Option C for Mid Suffolk the greatest proportion of additional homes would be almost equally delivered between the Market Towns and Urban Areas (37%) and Core Villages (36%), with significantly fewer at the Ipswich Fringe settlements (12%). The Market Towns and Urban Areas would receive more homes than under Policy SP04, and the Ipswich Fringe and Core Villages fewer. The Hinterland Villages and Hamlets would receive similar amounts of housing as Policy SP04 (12% in total). It should be noted that the Market Towns and Urban Areas would receive the same number of dwellings as under Option C, which is around 700 more than under Policy SP04.

**7.141** On average, this means that the following numbers of dwellings would be delivered per settlement in each of the settlement categories.

**Table 7.16: Average number of additional dwellings per settlement in Mid Suffolk under Option C**

JLP settlement category	Number of settlements as per Policy SP03	Total dwellings under Option C	Average number of dwellings per settlement
Ipswich Fringe	7	1,500	214
Market Towns and Urban Areas	3	4,700	1,567
Core Villages	11	4,500	409
Hinterland Villages	40	1,100	28
Hamlets	86	400	5
Windfalls	N/A	500	N/A

Note: Villages in the Ipswich Policy Area are included in the figures for the Ipswich Policy Area. In the settlement hierarchy, some settlements have been divided into more than one component part – each is treated separately in the figures in this table.

**7.142** This shows that the Market Towns and Urban Areas would receive on average considerably more dwellings than under Policy SP04 and the same as under Option B. However, under Option C the number of dwellings on average for both the Ipswich Fringe settlements and the Core Villages would decrease compared to Policy SP04, but not that significantly. Option C is slightly more closely aligned to Policy SP04 than is Option B.

**7.143** The overall pattern of housing stock is likely to change as a result of Policy SP04 from the beginning to the end of the Plan period as follows:

**Table 7.17: Mid Suffolk District estimated housing stock at the beginning and end of the Plan period under Option C**

Settlement hierarchy category	Estimated housing stock at the beginning of the Plan period	% of total housing stock at the beginning of the Plan period	Estimated housing stock at the end of the Plan period	% of total housing stock at the end of the Plan period
Ipswich Fringe	3,557	8%	5,057	9%
Market Towns and Urban Areas	12,721	28%	17,421	30%
Core Villages	10,229	23%	14,729	26%

Settlement hierarchy category	Estimated housing stock at the beginning of the Plan period	% of total housing stock at the beginning of the Plan period	Estimated housing stock at the end of the Plan period	% of total housing stock at the end of the Plan period
Hinterland Villages	11,014	24%	12,114	21%
Hamlets	7,647	17%	8,047	14%
<b>Total</b>	<b>45,168</b>	<b>100%</b>	<b>57,368</b>	<b>100%</b>

BMSDC (Note: ignores windfall provision)

**7.144** As with Mid Suffolk Option B, the overall effect on the proportion of total housing stock in each of the settlement categories under Option C varies little compared to the outcome under Policy SP04, and it is not that dissimilar to that which would be achieved under Option B. Compared to Policy SP04, there is a slight shift from the settlements in the Ipswich Fringe to the Market Towns and Urban Areas, but otherwise it is largely the same. Compared to Option B, there is a slight shift from the Ipswich Fringe settlements to the Core Villages, but again it is not that marked in total housing stock terms.

**7.145** The numbers of homes to be delivered at the Market Towns and Urban Areas under Option C is the same as under Option B, so again it might be expected that this option would fare particularly well against the SA Objectives, given the findings of the SA of the Spatial Strategy Options in **Chapter 5 (Sustainability Appraisal Findings for the Spatial Strategy Options)** of this SA Report.

**7.146** However, as noted for Option B, Policy SP04 already focuses far more development at the Market Towns and Urban Areas, on an average number of homes per settlement basis, and the difference in concentrating even more homes on the Market Towns and Urban Areas is unlikely to be that great given the numbers involved. This is illustrated in particular by the changes in the total housing stock at the end of the Plan period which show a shift to the Market Towns and Urban Areas, but not one that is significantly different to Policy SP04. As a result, many of the effects identified for Option C are the same as for Policy SP04 and for Option B.

**7.147** Differences have been identified compared to Policy SP04 with respect to SA Objective 4 (Housing) and SA Objective 15 (Town Centres). Although Option C would concentrate more homes at the Market Towns and Urban Areas, this would mean fewer homes elsewhere, including the Ipswich Fringe (which is an important commuting destination for residents of Mid Suffolk) and the Core Villages. This in turn might mean that there is less opportunity for people living where they wish to live, including close to Ipswich, and that the smaller amount of housing outside the Market Towns and Urban Areas may result in there being less opportunity to

address affordability issues outside of these settlements. As a result, it is anticipated that Option C would result in a mixed significant positive and minor negative effects on SA Objective 4 (Housing).

**7.148** On the other hand, focusing even more development at the Market Towns and Urban Areas would be likely to provide even greater support for their town centres, resulting in a significant positive effect against SA Objective 15 (Town Centres), with less of the minor negative effects identified for the other two options.

**7.149** With the exception of these two SA Objectives, the effects of Option C are likely to be similar to those of Policy SP04. Option C performs the same as Option B in terms of the effects against the SA Objectives, even though there are differences in the balance of homes between the Ipswich Fringe and the Core Villages. This reflects the findings of the

SA of the Spatial Strategy Options, which found that the Core Villages and Ipswich Fringe performed similarly against the SA Objectives. It also reflects the fact that some of the Core Villages in Mid Suffolk, such as Elmswell, Thurston and Woolpit are in the key strategic transport corridor linking Ipswich, Stowmarket and Bury St Edmunds, and between them have a combination of access to important local employment sites, railway stations, and local shops, services and facilities such as schools and healthcare.

**7.150** It should be noted that the actual effects will depend upon which sites would be allocated under this option, given that many of the effects are more easily identified and evaluated at the site level. This is addressed in **Chapter 6 (Sustainability Appraisal of Reasonable Alternative Sites)** of this SA Report.

#### Discounted alternative options (Mid Suffolk)

**Option B: Market Towns and Urban Areas focus:** This alternative spatial pattern is discounted as the proposed policy distribution is considered the most balanced and appropriate mix accounting for the availability and deliverability of sites, the sensitivities and constraints of the area, and the infrastructure capacity and opportunities.

**Option C: Proportionate growth:** This alternative spatial pattern is discounted as the proposed policy distribution is considered the most balanced and appropriate mix accounting for the availability and deliverability of sites, the sensitivities and constraints of the area, and the infrastructure capacity and opportunities.

## Policy SP05 – Employment Land

### A. Policy SP05 – Employment Land.

No alternative options are presented as not considered to be reasonable on the basis of the supporting evidence on the projected economic growth combined with the current land supply baseline position, particularly taking account of the recent temporary amendments to the Use Class Order.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	+
2. To maintain and improve levels of education and skills in the population overall.	++
3. To reduce poverty and social exclusion and ensure access to jobs and services.	++/-
4. To meet the housing requirements of the whole community.	0
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	++/-
7. To conserve soil and mineral resources.	++
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	++/-
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	+
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	+
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscape.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	++
15. To revitalise the Districts' town centres.	+
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	++/-

### Option A: Policy SP05 – Employment Land

**7.151** Policy SP05 (Employment Land) is expected to have a significant positive effect on SA Objective 14 (Economic Growth) because the policy protects the strategic employment sites across both Districts, whilst also supporting their expansion. The policy specifically states that employment-led regeneration will be supported at Brantham and the Former Sproughton Sugar Beet Factory. All of the strategic employment sites are expected to continue to provide for local employment over the plan period but if they are redeveloped for alternative non-employment uses, alternative provision and/or contributions must be made to secure alternative employment provision.

**7.152** A large proportion of the strategic employment sites are located within or on the edge or close to the edge of Market Towns. Therefore, it is likely that their expansion will result in an increase in people working at the market towns, which could increase footfall in the town centres during lunch breaks and after work. Therefore, a minor positive effect is expected against SA Objective 15 (Town Centres).

**7.153** The other main focus of the strategic employment sites is at the Ipswich Fringe settlements, which is compatible with the sub-regional importance of Ipswich as a major employment and service centre, and with Policy SP03 (Settlement Hierarchy) and Policy SP04 (Spatial Distribution).

**7.154** The main exceptions to this are: the strategic employment site at Acton Place, which is an isolated industrial

estate, one mile from Acton, designated as a Core Village, and four miles from the centre of the nearest Market Town being Sudbury; and Woolpit Business Park, which is on the western edge of Woolpit, designated as a Core Village, seven miles from the nearest Market Town, being Stowmarket to the west, as well as ten miles from Bury St Edmunds to the west. Woolpit Business Park is well located to the A14, although it is 2.5 miles from the nearest station at Elmswell.

**7.155** In addition, the site at Brantham earmarked for regeneration is in a relatively isolated and sensitive coastal location adjacent to the Suffolk Coast and Heaths AONB, and some distance from any of the Market Towns or Ipswich Fringe. Although it is close to the A137, it is some distance from the strategic road network and is two miles from the closest station at Manningtree. However, it is a large brownfield site with a history of industrial use.

**7.156** Policy SP05 is expected to have a significant positive effect against SA Objective 3 (Accessibility) because protecting and supporting the expansion of existing employment areas across both Districts, close to the main centres of population, will improve accessibility to job opportunities. However, this is combined with a minor negative effect to recognise that some of the strategic employment sites are not so well located to the main centres of population, and some are located on the edge or close to the edge of settlements, where accessibility by car is likely to be most practicable.

**7.157** Some employment sites may provide opportunities for skills development through apprenticeships. For example, the policy states that in determining applications, weight shall be given to proposals which make provision for skills and training packages, which are supported by the LPA. Therefore, a significant positive effect is expected in relation to SA Objective 2 (Education and Skills)

**7.158** A significant positive effect is expected in relation to SA Objective 7 (Soils and Minerals) because this policy supports the expansion of existing employment areas, in addition to employment-led regeneration at Brantham and the Former Sproughton Sugar Beet Factory. Therefore, development is likely to take place on brownfield land, making efficient use of previously developed land. Furthermore, the policy states that development along the strategic transport corridors will be supported where prioritisation is given to brownfield land.

**7.159** According to Policy SP05, development of additional employment sites will be supported provided the design and layout of development is sensitive to its surroundings, including landscape, heritage and biodiversity assets. Indeed, both greenfield and brownfield land can have biodiversity interest even if not designated. The policy specifically highlights the sensitivity of the Brantham site, stating that the site could offer significant potential for biodiversity net gain as

well as landscape improvements to reflect its location close to the AONB and coast. The regeneration of the Former Sproughton Sugar Beet Factory must also be sensitive to landscape, biodiversity and heritage assets. Therefore, minor positive effects are expected in relation to SA Objective 11 (Biodiversity and Geodiversity), SA Objective 12 (Historic Environment) and SA Objective 13 (Landscape/Townscape).

**7.160** As described above, development of net additional employment sites shall be supported along the strategic transport corridors (A12, A14 and A140), provided adequate highway access and off-road parking is present. There is greater accessibility to bus services along these strategic transport corridors and a number of strategic employment sites are located within close proximity of a railway station. However, the location of employment land along these major roads is likely to result in people travelling via private car to reach these employment sites. This could have an adverse effect on air quality, whilst also contributing to CO<sub>2</sub> emissions. Despite this, the policy states that all proposals must ensure provision of accessibility to public transport, including walking and cycling provision. Therefore, a mixed significant positive and minor negative effect is expected against SA Objective 16 (Sustainable Travel), SA Objective 6 (Air and Noise) and SA Objective 9 (Climate Change Mitigation). A minor positive effect is also expected against SA Objective 1 (Health and Wellbeing).

## Policy SP06 – Retail Land Town Centre Use

### A. Policy SP06 – Retail Land Town Centre Use.

No alternative strategic options are considered reasonable. The approach is based upon NPPF definitions and evidence (Babergh and Mid Suffolk Retail and Town Centre study, 2017), is considered in accordance with NPPF and relevant to local circumstances.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	+/-
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	+
4. To meet the housing requirements of the whole community.	0
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	+/-
7. To conserve soil and mineral resources.	++?
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	+
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	0
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	+
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	++
15. To revitalise the Districts' town centres.	++
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	+

### Option A: Policy LP06 – Retail Land Town Centre Use

**7.161** Policy LP06 (Retail Land Town Centre Use) supports proposals for new retail and town centre uses within the defined town centre areas, which will help revitalise town centres at the same time as having beneficial effects on the economy. Therefore, significant positive effects are expected in relation to SA Objective 15 (Town Centres) and SA Objective 14 (Economic Growth). A minor positive effect is expected in relation to SA Objective 3 (Accessibility) because development of new retail and town centre uses is likely to generate more job opportunities close to where a significant proportion of residents live and, in some instances, such as

Stowmarket, in towns where there are neighbourhoods with relatively high deprivation.

**7.162** A significant positive but uncertain effect is expected in relation to SA Objective 7 (Soils and Minerals) because the policy supports development within defined town centre areas, which is likely to be brownfield land but this is uncertain.

**7.163** A minor positive effect is expected in relation to SA Objective 16 (Sustainable Travel) because Policy LP06 promotes new uses within town centres, which are easily accessible via public transport, in addition to walking and cycling. This is likely to reduce reliance on the private car and associated CO<sub>2</sub> emissions. Therefore, a minor positive effect

is also expected in relation to SA Objective 9 (Climate Change Mitigation).

**7.164** A mixed minor positive and minor negative but uncertain effect is expected in relation to SA Objective 6 (Air and Noise) and SA Objective 1 (Health and Wellbeing) because promoting more active modes of transport will help reduce air pollution, with beneficial effects on health. However, town centres tend to be where high pollution levels are found and therefore concentrating development in town centres is also likely to result in adverse effects on air quality, in addition to health.

**7.165** Minor positive effects are expected in relation to SA Objective 12 (Historic Environment) and SA Objective 13 (Landscape/Townscape) because the policy states that in order to protect and enhance the historic environment, development proposals will need to demonstrate they have been designed with the setting and townscape taken into consideration.

**7.166** With regard to flood risk, a number of town centres are surrounded by Flood Zones 2 and 3, such as Eye and Sudbury. However, the town centres do not fall within either flood zone. Therefore, a negligible effect is expected in relation to SA Objective 10 (Climate Change Adaptation).

## Policy SP07 – Tourism

### A. Policy SP07 – Tourism.

No alternative strategic options are considered reasonable. The approach is supportive of this important economic sector, compliant with NPPF and includes criteria relevant to local circumstances.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	0
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	0
4. To meet the housing requirements of the whole community.	0
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	+
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	+
11. To conserve and enhance biodiversity and geodiversity.	0
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	+
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscape.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	++
15. To revitalise the Districts' town centres.	++
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

### Option A: Policy SP07 – Tourism

**7.167** Policy SP07 (Tourism) promotes development that will support tourism across both Districts. These include the Market Towns, in addition to smaller areas historically known as the 'wool towns'. This is expected to have beneficial effects on the economy, whilst also helping to revitalise town centres through an increase in footfall as a result of tourism. Therefore, overall, significant positive effects are expected in relation to SA Objective 14 (Economic Growth) and SA Objective 15 (Town Centres).

**7.168** A minor positive effect is expected in relation to SA Objective 13 (Landscape/Townscape) because Policy SP07 states that new development that supports tourism will be permitted, provided the development is appropriate in scale

and character, and to the nature of the locality. The policy also states that historic, recreational and landscape based tourism proposals that demonstrate protection and enhancement of heritage, the environment and landscape assets will be actively encouraged. As such, a minor positive effect is also expected in relation to SA Objective 12 (Historic Environment).

**7.169** Minor positive effects are also expected in relation to SA Objective 9 (Climate Change Mitigation) and SA Objective 10 (Climate Change Adaptation) because the policy states that all tourism and leisure proposals will be required to demonstrate how they contribute to climate change adaptation and mitigation.

## Policy SP08 – Strategic Infrastructure Provision

### A. Policy SP08 – Strategic Infrastructure Provision.

No alternative strategic options are considered reasonable. The approach is based upon evidence, is considered in accordance with NPPF to support infrastructure delivery and relevant to local circumstances. Other infrastructure matters are recognised as important to the delivery of growth but are considered to be of a more local nature and are addressed in the Places sections where appropriate.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	++
2. To maintain and improve levels of education and skills in the population overall.	++
3. To reduce poverty and social exclusion and ensure access to jobs and services.	0
4. To meet the housing requirements of the whole community.	0
5. To conserve and enhance water quality and resources.	+
6. To maintain and where possible improve air quality and reduce noise pollution.	+/-?
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	++?
9. To reduce contribution to climate change.	+/-?
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	?
11. To conserve and enhance biodiversity and geodiversity.	++
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	0
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	+
15. To revitalise the Districts' town centres.	+
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	+/-?

### Option A: Policy SP08 – Strategic Infrastructure Provision)

**7.170** Policy SP08 (Strategic Infrastructure Provision) is expected to have a significant positive effect in relation to SA Objective 2 (Education and Skills) because the policy specifically references a district wide education expansion programme. According to the policy, the expansion programme will be required to match the projected population growth.

**7.171** Policy SP08 states that strategic infrastructure project areas will be identified for protected Habitats Mitigation Zones.

Therefore, a significant positive effect is expected in relation to SA Objective 11 (Biodiversity and Geodiversity).

**7.172** The policy makes reference to transportation improvements along the A12 and A14 corridors, in addition to the delivery of the Ipswich Strategic Planning Area Transport Mitigation Strategy to mitigate cumulative transport impacts. It is likely that improvements to the A12 and A14 could make travel via the private car more attractive and could therefore increase the number of cars on the road, with adverse effects on air quality and associated CO<sub>2</sub> emissions. However, it is also possible that strategic infrastructure provision will include improvements to public transport networks, in addition to footpaths and cycling routes – even though specific reference

to these is not included in the policy. Therefore, overall, a mixed minor positive and minor negative but uncertain effect is expected in relation to SA Objective 16 (Sustainable Travel), SA Objective 6 (Air and Noise) and SA Objective 9 (Climate Change Mitigation).

**7.173** The provision of transport infrastructure may improve accessibility to local centres, having minor positive effects on SA Objective 15 (Town Centres) and SA Objective 14 (Economic Growth). The latter is especially due to the fact the policy states that improvements will be made to digital technology infrastructure.

**7.174** In general, Policy SP08 promotes strategic infrastructure provision, which can include community healthcare facilities. Indeed, the policy specifically states that all development must make provision for appropriate contributions towards community infrastructure in line with the Infrastructure Delivery Plan. Therefore, a significant positive effect is expected in relation to SA Objective 1 (Health and Wellbeing).

**7.175** A minor positive effect is also expected against SA Objective 5 (Water) because the policy states that upgrades from 2025 will be made to the Hertismere water supply infrastructure network.

**7.176** It is not stated whether strategic infrastructure includes Sustainable Urban Drainage Systems (SuDS) and waste management facilities, as specific reference is not made to these in the policy. Therefore, uncertain effects are expected in relation to SA Objective 10 (Climate Change Adaptation) and SA Objective 8 (Waste).

## Policy SP09 – Enhancement and Management of the Environment

### A. Policy SP09 – Enhancement and Management of the Environment.

No alternative strategic options are considered reasonable. The alternative would be not putting a strategic approach in place however RAMS policy approach is a far more efficient and coordinated option approach to the problem. The approach is based upon evidence, is considered in accordance with NPPF to support cross boundary mitigation.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	0
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	0
4. To meet the housing requirements of the whole community.	0
5. To conserve and enhance water quality and resources.	+?
6. To maintain and where possible improve air quality and reduce noise pollution.	+?
7. To conserve soil and mineral resources.	+?
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	+
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	+?
11. To conserve and enhance biodiversity and geodiversity.	++
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	++
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	++
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

### Option A: Policy SP09 – Enhancement and Management of the Environment)

**7.177** Policy SP09 (Enhancement and Management of the Environment) requires proposals to support the enhancement and management of the natural and local environment and networks of green infrastructure, including the landscape, biodiversity, geodiversity and the historic environment. Therefore, significant positive effects are expected in relation to SA Objective 11 (Biodiversity and Geodiversity), SA Objective 13 (Landscape/Townscape) and SA Objective 12 (Historic Environment). The policy states that proposals should include environmental protection measures to mitigate any adverse impacts. With regard to new dwellings, when they

fall within the Protected Habitats Sites Mitigation Zone they will be required to make appropriate contributions through S106 agreements. These contributions will go towards helping manage projects and/or monitoring of visitor pressure and urban effects on Habitats Sites, in accordance with the HRA Recreational disturbance and Avoidance Mitigation Strategy. Development will otherwise need to submit separate evidence of compliance with Habitats Regulations Assessments. Reference is also made in the policy to biodiversity net gain and sustainable urban drainage systems.

**7.178** Policy SP09 supports environmental protection measures, including mitigating, adapting and responding to the effects of climate change. The supporting text to Policy SP09 makes reference to managing flood risk and water

resources, in addition to land resources, pollution and climate change. The actual policy itself also makes reference to sustainable urban drainage systems. Therefore, this policy is expected to have minor positive effects in relation to SA Objective 10 (Climate Change Adaptation), SA Objective 5 (Water), SA Objective 7 (Soils and Minerals) and SA Objective 6 (Air and Noise). The effects are recorded as uncertain because the policy does not make specific reference to these measures.

**7.179** A minor positive but uncertain effect is also expected against SA Objective 9 (Climate Change Mitigation) because this policy seeks to enhance and manage the natural environment, which includes open spaces and the countryside, which will help absorb CO<sub>2</sub> emissions present within the atmosphere.

## Policy SP10 – Climate Change

### A. Policy SP10 – Climate Change.

No alternative options are considered reasonable. In order to future proof development in the two districts it was decided to consolidate a strategic approach to support development management policies. Addressing climate change is considered a key sustainability matter and the policy requires appropriate measures to be implemented to make growth resilient to local impacts of climate change. No reasonable alternative policy has been identified at this stage.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	+
2. To maintain and improve levels of education and skills in the population overall.	+
3. To reduce poverty and social exclusion and ensure access to jobs and services.	++?
4. To meet the housing requirements of the whole community.	0
5. To conserve and enhance water quality and resources.	+
6. To maintain and where possible improve air quality and reduce noise pollution.	+
7. To conserve soil and mineral resources.	+
8. To promote the sustainable management of waste.	+
9. To reduce contribution to climate change.	++
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	++
11. To conserve and enhance biodiversity and geodiversity.	+
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	0
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

### Option A: Policy SP10 – Climate Change

**7.180** Policy SP10 (Climate Change) requires development proposals to be proactive in their approach to mitigate and adapt to climate change. The policy encourages sustainable design and construction, in addition to proactive approaches to deliver decentralised energy systems powered by renewable or low carbon sources. This could help reduce any air pollution that previously may have occurred from non-renewable energy sources. According to the policy, proposals should consider adaptations to protect developments from flood risk, coastal change, lack of water supply, biodiversity, landscapes, extreme winter weather and overheating from

rising temperatures. The policy lists some example approaches to this, including tree planting for shelter and biodiversity net gain. The policy also states that the principle of Holistic Water Management will be promoted. As such, significant positive effects are expected in relation to SA Objective 9 (Climate Change Mitigation) and SA Objective 10 (Climate Change Adaptation), and minor positive effects are expected in relation to SA Objective 5 (Water), SA Objective 11 (Biodiversity and Geodiversity), SA Objective 13 (Landscape/Townscape) and SA Objective 6 (Air and Noise).

**7.181** As set out in Policy SP10, development will be supported provided it demonstrates an approach to reduce waste, and to make use of existing resources throughout the

lifetime of the development. Therefore, minor positive effects are expected in relation to SA Objective 8 (Waste) and SA Objective 7 (Soils and Minerals).

**7.182** Decentralised renewable or low carbon energy systems could include community-led initiatives, which could help reduce fuel poverty and offer jobs to local people. Therefore, a minor positive but uncertain effect is expected against SA Objective 3 (Accessibility). A minor positive effect is also expected in relation to SA Objective 2 (Education and Skills) because the transition to a green economy as part of mitigating and adapting to climate change, will require upskilling or retraining in green jobs that will become increasingly relevant and in demand in the future.

**7.183** Lastly, a minor positive effect is expected in relation to SA Objective 1 (Health and Wellbeing) because the measures proposed by this policy to mitigate and adapt to climate change are likely to help protect people from extreme weather events, such as increasing temperatures and flooding.

## Summary of SA scores for Part 1: Strategic Policies

**7.184 Table 7.18** below shows all the SA scores for the Part 1: Strategic Policies.

Table 7.18: Summary of SA scores for Part 1: Strategic Policies

Policy	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
Policy SP01 – Housing Needs (Babergh District)	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0
Policy SP01 – Housing Needs (Mid Suffolk District)	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0
Policy SP02 – Affordable housing (Babergh District)	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0
Policy SP02 – Affordable housing (Mid Suffolk District)	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0
Policy SP03 – Settlement Hierarchy	+	+	++/-	++/-	?	--/	?	0	+	?	+	+	+	+	++	+
Policy SP04 – Housing Spatial Distribution (Babergh District)	++/-	++/-	++/-	++	-	--/+	--/+	N/A	++/-	-	--?	-?	-	++/-	++/-	++/-
Policy SP04 – Housing Spatial Distribution (Mid Suffolk District)	++/-	++/-	++/-	++	-	--/+	--/+	N/A	++/-	-	--?	-?	-	++/-	++/-	++/-
Policy SP05 – Employment Land	+	++	++/-	0	0	++/-	++	0	++/-	0	+	+	+	++	+	++/-
Policy SP06 – Retail Land Town Centre Use	+/-	0	+	0	0	+/-	+++?	0	+	0	0	+	+	++	++	+
Policy SP07 – Tourism	0	0	0	0	0	0	0	0	+	+	0	+	+	++	++	0
Policy SP08 – Strategic Infrastructure Provision	++	++	0	0	+	+/-?	0	+++?	+/-?	?	++	0	+	+	+	+/-?
Policy SP09 – Enhancement and Management of the Environment	0	0	0	0	+?	+?	+?	0	+	+?	++	++	++	0	0	0
Policy SP10 – Climate Change	+	+	+?	0	+	+	+	+	++	++	+	0	+	0	0	0

## Part 2: SA of development management policies

### Policy LP01 – Windfall development in hamlets and dwellings clusters

#### A. LP01 – Windfall development in hamlets and dwellings clusters.

No alternatives are put forward at this stage, as the policy proposes a flexible approach in conformity with the NPPF. An alternative would be to consider any small clusters of housing as countryside, however it is considered that this approach does not enable sufficient flexibility to meet needs locally and enable settlements to change over time. It is recognised that such areas do not have good infrastructure however the scale of growth supported through the policy should minimise the impacts on this.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	+
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	-
4. To meet the housing requirements of the whole community.	+/-
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	+
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	+/-
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	+
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	+
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	-

#### Option A: Policy LP01 – Windfall development in hamlets and dwellings clusters

**7.185** Policy LP01 (Windfall development in hamlets and dwellings clusters) supports windfall development in hamlets and dwelling clusters subject to certain criteria. The promotion of windfall development will contribute to the housing supply but it will not necessarily be the right houses in the right places to meet the identified need. Additionally, the overall

contribution is likely to be small. Therefore, a mixed minor positive and minor negative effect is expected against SA Objective 4 (Housing).

**7.186** A minor positive effect is expected in relation to SA Objective 7 (Soils and Minerals) because reference is made to infill development, and this is unlikely to take place on agricultural land.

**7.187** The policy supports windfall development that is not detrimental to the character and appearance of the settlement, landscape (including the AONB), residential amenity or any heritage, environmental or community assets. More specifically, the policy states that proposals must not result in sporadic or ribbon development, or the loss of gaps between settlements resulting in coalescence. Special regard should also be given to proposals that preserve or enhance development in the AONBs. Therefore, minor positive effects are expected in relation to SA Objective 13 (Landscape/Townscape), SA Objective 1 (Health and Wellbeing) and SA Objective 12 (Historic Environment). The policy supports development which protects and enhances biodiversity and geodiversity affected by the proposal. Therefore, minor positive effects are also expected in relation to SA Objective 11 (Biodiversity and Geodiversity).

**7.188** Development within dwelling clusters and/or defined hamlets, is likely to take place in more rural, isolated areas where fewer services are available. Therefore, people may need to travel further and by private car to reach the larger settlements where more services and facilities are located, in addition to their places of work. Therefore, a minor negative effect is expected in relation to SA Objective 16 (Sustainable Travel) and SA Objective 3 (Accessibility).

**7.189** The increased use of private car may have a minor negative effect in relation to SA Objective 9 (Climate Change Mitigation) due to the likely increase in CO<sub>2</sub> emissions. However, the policy requires that new development should minimise dependence on fossil fuels and contribute towards climate change mitigation through sustainable construction and renewable energy technologies. Therefore, a mixed minor positive and minor negative effect is expected in relation to SA Objective 9 (Climate Change Mitigation).

**7.190** The supporting text to the policy states that the policy will support the delivery of M4(2) standards for accessible and adaptable dwellings. This will contribute to the minor positive effects already recorded against SA Objective 1 (Health and Wellbeing).

## Policy LP02 – Residential Annexes

### A. Policy LP02 – Residential Annexes.

No reasonable alternative policy has been identified at this stage, as the policy is a reasonable and proportionate to meeting needs.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	+
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	0
4. To meet the housing requirements of the whole community.	+
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	+
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	+
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	+
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

### Option A: Policy LP02 – Residential Annexes

**7.191** Policy LP02 (Residential Annexes) supports proposals for residential annexes, provided annexes attached to a main building are designed in a way that means they can continue to be used as an ancillary and subordinate part to the main dwelling, without creating an independent dwelling and/or separate planning unit now and in the future. The use of these annexes is restricted to persons related to the occupants of the main dwelling. The supporting text to the policy states that an annexe can create a useful facility for the support and care of family members. Therefore, overall, a minor positive effect is expected against SA Objective 4 (Housing) because the policy supports the development of residential annexes for

extended family members or other lawful relationships, so as to meet the changing needs of family circumstances over time.

**7.192** The policy supports proposals that minimise dependence on fossil fuels, whilst also adopting a sustainable approach to energy use. Therefore, the policy is expected to have a minor positive effect against SA Objective 9 (Climate Change Mitigation).

**7.193** As set out in Policy LP02, residential annexes not attached to a main building must be subordinate in scale, form and mass from the main dwelling, and must contain a physical and/or functional link to the main dwelling. Where a proposal harms a heritage asset, the local planning authority will resist the proposal. Therefore, a minor positive effect is expected

against SA Objective 12 (Historic Environment) and SA Objective 13 (Landscape/Townscape).

**7.194** A minor positive effect is also expected against SA Objective 1 (Health and Wellbeing) because Policy LP02 allows for the support and care of family members, and it ensures that development of residential annexes will only be permitted if there will be no adverse effects on residential amenity when assessed against other relevant policies.

**7.195** A minor positive effect is also expected against SA Objective 11 (Biodiversity and Geodiversity) as the policy outlines that where applicable, proposals must protect and enhance biodiversity and geodiversity. Additionally, proposals must not result in the felling of or any damage to any significant trees and hedgerows that contribute to environmental quality, in addition to visual amenity.

## Policy LP03 – Residential Extensions and Conversions

### A. Policy LP03 – Residential Extensions and Conversions.

No reasonable alternative policy has been identified at this stage, as the policy is a reasonable and proportionate approach to meeting needs.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	+
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	0
4. To meet the housing requirements of the whole community.	+
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	+
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	+
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

### Option A: Policy LP03 – Residential Extensions and Conversions

**7.196** Policy LP03 (Residential Extensions and Conversions) supports residential extensions and conversions provided they meet certain criteria. The ability to extend or convert an existing dwelling is likely to have a minor positive effect against SA Objective 4 (Housing) because it will enable people to adapt their homes to meet their changing needs, whilst also providing a range and mix of housing.

**7.197** Minor positive effects are expected against SA Objective 1 (Health and Wellbeing) because the policy ensures that development will not result in adverse effects on residential amenity.

**7.198** According to Policy LP03, development must be in keeping with the size, scale, mass, design and materials of the existing dwelling and wider setting. Furthermore, the proposal must incorporate good quality design which maintains or enhances the character and appearance of the building, street scene and surroundings, and must not harm any heritage assets. Therefore, a minor positive effect is expected against SA Objective 12 (Historic Environment) and SA Objective 13 (Landscape/Townscape).

**7.199** The policy supports proposals that would not cause damage to or result in the felling of any significant trees or hedgerows that contribute to the environmental quality and visual amenity of the area. Therefore, a minor positive effect is expected in relation to SA Objective 11 (Biodiversity and Geodiversity).

## Policy LP04 – Replacement Dwellings in the Countryside (Outside of Settlement Boundaries)

A. Policy LP04 – Replacement Dwellings in the Countryside (Outside of Settlement Boundaries).

No alternatives are put forward at this stage, as the policy is in conformity with the NPPF.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	+
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	0
4. To meet the housing requirements of the whole community.	+
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	?
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	+
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	+
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

### Option A: Policy LP04 – Replacement Dwellings in the Countryside (Outside of Settlement Boundaries)

**7.200** Policy LP04 (Replacement Dwellings in the Countryside (Outside of Settlement Boundaries)) has a direct relationship with Policy LP03 (Residential Extensions and Conversions) but sets out criteria for replacement dwellings outside of settlement boundaries and within the countryside. Policy LP04 (Replacement Dwellings in the Countryside (Outside of Settlement Boundaries)) states that proposals to replace an existing dwelling in the countryside or the conversion/erection of ancillary buildings or boundary treatments for such dwellings, should comply with Policy LP03. Therefore, Policy LP04 is expected to have similar effects to Policy LP03.

**7.201** Policy LP04 is expected to have minor positive effects against SA Objective 1 (Health and Wellbeing), SA Objective 11 (Biodiversity and Geodiversity), SA Objective 12 (Historic Environment) and SA Objective 13 (Landscape/Townscape) in line with Policy LP03.

**7.202** Policy LP04 itself is likely to contribute towards the positive effects against SA Objective 12 (Historic Environment) and SA Objective 13 (Landscape/Townscape) because it states that the design, size, scale, mass and materials of development must be compatible to the area's character and appearance, and must be no more visually intrusive to that of the original dwelling to be replaced. Additionally, it must respect any heritage value of the area, including setting value. The dwelling to be replaced must not

be a listed building, a building of historic or architectural importance and merit, or a non-designated heritage asset.

**7.203** A minor positive effect is expected against SA Objective 4 (Housing) because the policy supports the replacement of dwellings and the conversion/erection of ancillary buildings. This will enable people to adapt their homes to meet their changing needs, whilst also providing a range and mix of housing.

**7.204** A minor positive effect is expected in relation to SA Objective 7 (Soils and Minerals) because the policy states that development must not take place on the best and most versatile agricultural land, which would help preserve soil resources.

## Policy LP05 – Replacement Dwellings and Additional Dwellings on Sub-Divided Plots Within Settlement Boundaries

A. Policy LP05 – Replacement Dwellings and Additional Dwellings on Sub-Divided Plots Within Settlement Boundaries.

No reasonable alternative policy has been identified at this stage, as the policy is a reasonable and proportionate approach to meeting needs.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	+
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	+
4. To meet the housing requirements of the whole community.	+
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	+
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	+
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

### Option A: Policy LP05 – Replacement Dwellings and Additional Dwellings on Sub-Divided Plots Within Settlement Boundaries

**7.205** Policy LP05 (Replacement Dwellings and Additional Dwellings on Sub-Divided Plots Within Settlement Boundaries) has a direct relationship with Policy LP03 (Residential Extensions and Conversions) but sets out criteria for replacement dwellings inside settlement boundaries. Policy LP05 (Replacement Dwellings and Additional Dwellings on Sub-Divided Plots Within Settlement Boundaries) states that proposals to replace an existing dwelling in the countryside or the conversion/erection of ancillary buildings or boundary treatments for such dwellings, should comply with Policy

LP03. Therefore, Policy LP05 is expected to have similar effects to Policy LP03.

**7.206** Policy LP05 is expected to have minor positive effects against SA Objective 1 (Health and Wellbeing), 11 (Biodiversity and Geodiversity), SA Objective 12 (Historic Environment) and SA Objective 13 (Landscape/Townscape) as a result of Policy LP03.

**7.207** Policy LP05 itself is likely to contribute towards the positive effects against SA Objective 1 (Health and Wellbeing) because development must not have an adverse effect on residential amenity. It must also provide acceptable private amenity and utility space, as well as acceptable access and parking.

**7.208** Policy LP05 is also expected to contribute towards the positive effects against SA Objective 12 (Historic Environment) and SA Objective 13 (Landscape/Townscape) because it states that proposals must incorporate good quality design that maintains and enhances the character and appearance of existing buildings, the street scene and surrounding context. Additionally, proposals must not result in inappropriate sub-division of lots/curtilages that would be out of keeping with existing context. Development must also not harm any listed buildings and their settings.

**7.209** A minor positive effect is expected against SA Objective 4 (Housing) because the policy supports the replacement of dwellings and the sub-division of residential plots and garden curtilages to create new dwellings. This will enable people to adapt their homes to meet their changing needs, whilst also providing a range and mix of housing.

## Policy LP06 – Mix and Type of Composition

### A. Policy LP06 – Mix and type of composition.

No reasonable alternative policy has been identified at this stage, the policy proposes a reasonable and proportionate approach to meeting specialist needs. The SHMA (2019 update) provides up to date evidence regarding supported and special needs housing.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	+
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	0
4. To meet the housing requirements of the whole community.	++
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	0
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	0
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	0
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

### Option A: Policy LP06 – Mix and type of composition

**7.210** Policy LP06 (Mix and type of composition) sets out the affordable housing need for both Districts, in addition to housing mix and type. The policy is expected to have a significant positive effect on SA Objective 4 (Housing) because it will provide a large number of affordable dwellings, whilst also meeting demand for different housing types.

**7.211** The policy states that dwellings will need to meet the requirements for accessible and adaptable dwellings under Part M4(2) of Building Regulations (or any relevant regulation that supersedes and replaces this one). Therefore, a minor positive effect is expected in relation to SA Objective 1 (Health and Wellbeing).

## Policy LP07 – Supported and Special Needs Housing

### A. Policy LP07 – Supported and Special Needs Housing.

No reasonable alternative policy has been identified at this stage, the policy proposes a reasonable and proportionate approach to meeting specialist needs. The SHMA (2019 update) provides up to date evidence regarding supported and special needs housing.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	++
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	+
4. To meet the housing requirements of the whole community.	++
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	+
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	+
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0
15. To revitalise the Districts' town centres.	+
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	+

### Option A: Policy LP07 – Supported and Special Needs Housing

**7.212** Policy LP07 (Supported and Special Needs Housing) supports the provision of specialist accommodation. Therefore, it is likely to have a significant positive effect on SA Objective 4 (Housing) because it will provide housing with care for older, disabled and vulnerable people. A significant positive effect is also expected against SA Objective 1 (Health and Wellbeing) because as well as providing accommodation to older, disabled and vulnerable people, the policy will ensure that development meets any special needs of those residents, including care requirements, which would have beneficial effects on their health and wellbeing. Additionally, the policy

requires specialist accommodation to be located within close proximity of health services.

**7.213** As set out in Policy LP07, specialist accommodation will be permitted where it is within well located areas and connected to urban areas or main core villages that have sufficient access to local services, facilities and job opportunities, in addition to public transport. Therefore, a minor positive effect is expected against SA Objective 16 (Sustainable Travel), in addition to SA Objective 3 (Accessibility). The proximity of accommodation to urban areas and core villages may also increase footfall in the town and district centres, with positive effects against SA Objective 15 (Town Centres). Furthermore, the policy states that proposals will need to meet the requirements for accessible

and adaptable dwellings under Part M4(2) of the Building Regulations (or any relevant regulation that supersedes and replaces this one). This will contribute towards the minor positive effects already recorded against SA Objective 1 (Health and Wellbeing).

**7.214** A minor positive effect is expected against SA Objective 11 (Biodiversity and Geodiversity) because the policy outlines that proposals should have regard for the protection and enhancement of biodiversity and geodiversity.

**7.215** In addition, the policy requires that proposals be sympathetic to the surrounding townscape and/or landscape, and must maintain, protect and enhance heritage assets and their settings. Therefore, minor positive effects are identified in relation to SA Objectives 12 (Historic Environment) and 13 (Landscape/Townscape).

## Policy LP08 – Affordable Housing

- A. Policy LP08 – Affordable Housing.
- B. Lower affordable housing requirement than set out in the SHMA.
- C. No market housing on rural exception sites.

SA Objective	A.	B.	C.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	0	0	0
2. To maintain and improve levels of education and skills in the population overall.	0	0	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	0	0	0
4. To meet the housing requirements of the whole community.	++	+/-	+/-
5. To conserve and enhance water quality and resources.	0	0	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0	0	0
7. To conserve soil and mineral resources.	0	0	0
8. To promote the sustainable management of waste.	0	0	0
9. To reduce contribution to climate change.	0	0	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0	0	0
11. To conserve and enhance biodiversity and geodiversity.	0	0	0
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	0	0	0
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	0	0	0
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0	0	0
15. To revitalise the Districts' town centres.	0	0	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0	0	0

### Option A: Policy LP08 – Affordable Housing

**7.216** Policy LP08 (Affordable Housing) supports affordable housing provision, which includes affordable rent/social rent, shared ownership and discounted home ownership/starter homes. The policy states that affordable housing must be delivered on-site unless it can be demonstrated in exceptional circumstances that it is not feasible or practical to provide the units on site in which case it may be agreed that a commuted sum could be paid towards off-site affordable housing provision. Therefore, a significant positive effect is expected against SA Objective 4 (Housing) because this policy will ensure the provision of affordable housing.

### Option B: Lower affordable housing requirement that set out in the SHMA.

**7.217** Option B would deliver a lower amount of affordable housing than is set out in the SHMA. Therefore, although this option would ensure the delivery of some affordable housing, it would not meet the identified need for affordable housing. As such, a mixed minor positive and minor negative effect is expected in relation to SA Objective 4 (Housing).

### Option C: No market housing on rural exception sites

**7.218** Option C would not provide market housing on rural exception sites. Therefore, it could result in the provision of a

greater number of affordable housing units. However, not providing any market housing on rural exception sites may result in the delivery of affordable housing not being financially

viable in some areas. This could result in fewer number of rural exception sites coming forwards. Therefore overall, a mixed minor positive and minor negative effect is likely.

#### Discounted alternative options

- **Option B: Lower affordable housing requirement that set out in the SHMA:** It is not considered appropriate to lower the AH requirement as this would not be likely to deliver the identified district volume of AH overall (not every site contributes to AH). Viability is built into the preferred policy to enable flexibility in exceptional circumstances
- **Option C: No market housing on rural exception sites:** This approach is considered more restrictive to rural housing delivery options.

## Policy LP09 – Provision for Gypsy and Traveller and Travelling Showpeople

### A. Policy LP09 – Provision for Gypsy and Traveller and Travelling Showpeople.

No alternative options are put forward at this stage, as the policy proposes a reasonable and proportionate approach to meeting the needs of Gypsy and Travellers.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	+
2. To maintain and improve levels of education and skills in the population overall.	+
3. To reduce poverty and social exclusion and ensure access to jobs and services.	+
4. To meet the housing requirements of the whole community.	++
5. To conserve and enhance water quality and resources.	+
6. To maintain and where possible improve air quality and reduce noise pollution.	+
7. To conserve soil and mineral resources.	+
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	0
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	0
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	0
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

### Option A: Policy LP09 – Provision for Gypsy and Traveller and Travelling Showpeople

**7.219** Policy LP09 (Provision for Gypsy and Traveller and Travelling Showpeople) supports the provision of permanent and transit pitches for gypsies, travellers and travelling showpeople on suitable sites within both Districts. The supporting text to the policy sets out the identified need for Gypsy and Traveller provision, which in Babergh District is for one permanent pitch and in Mid Suffolk District is for nine permanent pitches in the plan period, which the JLP seeks to achieve. Therefore, a significant positive effect is expected in relation to SA Objective 4 (Housing).

**7.220** As set out in Policy LP09, the site must be well located with regard to local services and facilities, particularly medical

services and schools, and by means other than the private car. Furthermore, proposals including employment uses on-site must not have any adverse effect on amenity. Therefore, minor positive effects are expected in relation to SA Objective 1 (Health and Wellbeing), SA Objective 2 (Education and Skills) and SA Objective 3 (Accessibility).

**7.221** In addition, the policy requires that special regard is given to protecting and enhancing landscape, biodiversity and geodiversity affected by proposals. It also requires that heritage assets and their settings are maintained, protected and enhanced. Therefore, minor positive effects are expected in relation to SA Objective 11 (Biodiversity and Geodiversity), SA Objective 12 (Historic Environment) and SA Objective 13 (Townscape/Landscape).

**7.222** A minor positive effect is expected in relation to SA Objective 7 (Soils and Minerals) because the policy states that development must not take place on the best and most versatile agricultural land and would therefore preserve soil resources.

## Policy LP10 – Moorings, Marinas and Houseboats

### A. Policy LP10 – Moorings, Marinas and Houseboats.

No alternatives are considered reasonable at this stage, as the policy is relevant to local circumstances. Without the policy, there may be limited ability to manage impacts on the estuary and SPA if moorings and marinas intensified in use and impact.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	0
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	0
4. To meet the housing requirements of the whole community.	+
5. To conserve and enhance water quality and resources.	+
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	+
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	0
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

### Option A: Policy LP10 – Moorings, Marinas and Houseboats

**7.223** Policy LP10 (Moorings, Marinas and Houseboats) supports mooring, marinas and houseboats provided they do not have an adverse effect on the integrity of the Stour and Orwell SPA and Ramsar Site, in addition to the Suffolk Coast and Heaths AONB. Furthermore, a project level HRA will be required for each houseboat planning application and all proposals will need to demonstrate acceptable environmental protection measures. Therefore, a minor positive effect is expected in relation to SA Objective 11 (Biodiversity and Geodiversity) and SA Objective 13 (Landscape/Townscape).

**7.224** According to Policy LP10, proposals must demonstrate appropriate measures to ensure there is no risk of deterioration in Water Framework Directive status for the River Stour and Orwell. Furthermore, a Construction Environmental Management Plan will be required, which will demonstrate whether groundwater and surface water features are protected, and aquatic pollution controlled. Therefore, a minor positive effect is expected in relation to SA Objective 5 (Water).

**7.225** A minor positive effect is also expected in relation to SA Objective 4 (Housing) because this policy enables a very small volume of homes to be addressed through houseboats.

## Policy LP11 – Self-Build and Custom-Build

### A. Policy LP11 – Self-Build and Custom-Build.

No alternatives are put forward at this stage, as the policy proposes a flexible approach in conformity with the NPPF.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	+
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	0
4. To meet the housing requirements of the whole community.	+
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	+
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	+
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	+
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

### Option A: Policy LP11 – Self-Build and Custom-Build

**7.226** Policy LP11 (Self-Build and Custom-Build) supports self-build/custom-build housing or proposals that make a proportion of serviced dwelling plots available for sale to self-builders or custom builders. Therefore, a minor positive effect is expected against SA Objective 4 (Housing).

**7.227** A minor positive effect is also expected against SA Objective 3 (Accessibility) because the policy enables residents to take control of the design of their home so that it specifically meets their needs. Therefore, certain groups of people (e.g. those with disabilities) could ensure the internal layout of their properties specifically meets their needs.

**7.228** The policy outlines that proposals must minimise dependence on fossil fuels and the impact of development on

climate change. It states that proposals will be expected to make the fullest contribution to climate change mitigation through sustainable construction practices and renewable energy technologies. Therefore, a minor positive effect is expected in relation to SA Objective 9 (Climate Change Mitigation).

**7.229** In addition, the policy requires that special protection is given to the landscape, biodiversity and historic environment. Therefore, minor positive effects are expected in relation to SA Objective 13 (Townscape/Landscape), SA Objective 11 (Biodiversity and Geodiversity) and SA Objective 12 (Historic Environment). Proposals must also not cause significant harm to residential amenity. Therefore, minor positive effects are also expected in relation to SA Objective 1 (Health and Wellbeing).

## Policy LP12 – Employment Development

### A. Policy LP12 – Employment Development.

No alternatives are put forward at this stage, as the policy proposes a flexible approach in conformity with the NPPF. The criteria are considered to address key impacts for new use and uses within residential curtilage.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	+
2. To maintain and improve levels of education and skills in the population overall.	+
3. To reduce poverty and social exclusion and ensure access to jobs and services.	0
4. To meet the housing requirements of the whole community.	0
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	+/-
7. To conserve soil and mineral resources.	?
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	+/-
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	+
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	+
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscape.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	++
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	+/-

### Option A: Policy LP12 – Employment Development

**7.230** Policy LP12 (Employment Development) supports proposals for employment use, in addition to change of use to small scale employment use, predominantly within residential curtilage. Additionally, the policy states that where necessary, contributions should be made to the enhancement of the digital infrastructure network, which will have beneficial effects on productivity. Therefore, a significant positive effect is expected against SA Objective 14 (Economic Growth).

**7.231** A minor positive effect is expected in relation to SA Objective 2 (Education and Skills) because it is likely the development of employment land will provide more opportunities for skills development through local employment opportunities, particularly in rural locations.

**7.232** A minor positive effect is expected against SA Objective 1 (Health and Wellbeing) because the policy states that with regard to change of use to small scale employment use, the hours of operation must be compatible with residential use. Additionally, the business must not have any adverse effects on residential amenity.

**7.233** A minor positive effect is also expected against SA Objective 11 (Biodiversity and Geodiversity) as the policy outlines that proposals should protect and enhance biodiversity and geodiversity affected by development.

**7.234** Minor positive effects are also expected against SA Objective 12 (Historic Environment) and SA Objective 13 (Landscape/Townscape) because the policy states that

employment proposals must be sensitive to the surroundings, including any landscape and heritage assets.

**7.235** A mixed minor positive and minor negative effect is expected against SA Objective 16 (Sustainable Travel) because the policy promotes the use of sustainable and active modes of transport through footpath and cycle route improvements and locating development close to public transport. However, it is noted that the supporting text refers to rurally located economic development. The policy makes provision for off-road parking which could encourage the use of cars instead of more sustainable transport methods.

**7.236** A mixed minor positive and minor negative effect is expected against SA Objective 6 (Air and Noise) because although development must not involve significant noise, dust, fumes or other emissions, the creation of employment opportunities in rural areas, as well as larger, more urban areas, will inevitably result in an increase in noise and air pollution as a result of traffic movement. A mixed minor positive and minor negative effect is also expected in relation to SA Objective 9 (Climate Change Mitigation) for the reason outlined above. However, the policy states that proposals must minimise the impact of development on climate change, through sustainable construction practices and/or renewable energy technologies.

**7.237** An uncertain effect is expected in relation to SA Objective 7 (Soils and Minerals) because there is no reference in the policy to avoiding development on the best and most versatile agricultural land, yet development could potentially result in the loss of best and most versatile agricultural land.

## Policy LP13 – Safeguarding Economic Opportunities

### A. Policy LP13 – Safeguarding Economic Opportunities.

No reasonable alternative policy has been identified at this stage, as the policy is a reasonable and proportionate to meeting economic needs.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	+
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	++
4. To meet the housing requirements of the whole community.	0
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	0
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	0
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	0
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	++
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

### Option A: Policy LP13 – Safeguarding Economic Opportunities

**7.238** Policy LP13 (Safeguarding Economic Opportunities) safeguards existing employment land by only approving development in the vicinity of commercial and employment activity when no amenity conflicts will arise as a result of development. It states that the Council will resist the loss of employment land but sets out in what circumstances loss of employment land may be acceptable.

**7.239** The overall aim of Policy LP13 is to safeguard employment land and therefore a significant positive effect is expected in relation to SA Objective 14 (Economic Growth). Protecting employment sites will ensure there is continued accessibility to employment opportunities. Therefore, a

significant positive effect is also expected against SA Objective 3 (Accessibility).

**7.240** Policy LP13 seeks to prevent any adverse effects on residential amenity as a result of development. Therefore, a minor positive effect is expected against SA Objective 1 (Health and Wellbeing).

## Policy LP14 – Town Centre and Retail

### A. Policy LP14 – Town Centre and Retail.

At this stage there are no alternative approaches put forward which is considered to take account of local circumstances.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	+
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	+
4. To meet the housing requirements of the whole community.	+
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	0
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	0
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	++/-
15. To revitalise the Districts' town centres.	++
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

### Option A: Policy LP14 – Town Centre and Retail

**7.241** Policy LP14 (Town Centre and Retail) supports a balance of retail and non-retail uses in town centre boundaries. It makes reference to out of town centre developments and states that applications for Class E (retail and leisure development outside of town centre boundaries) that would have an adverse effect on the vitality and viability of nearby centres will not be supported. Therefore, a significant positive effect is expected against SA Objective 15 (Town Centres) and SA Objective 14 (Economic Growth). However, the significant positive effect for SA Objective 14 (Economic Growth) is mixed with a minor negative effect as this policy could preclude out of town centre economic development coming forward that would otherwise take place.

**7.242** Achieving a balance in Town Centres between retail and non-retail uses will also have beneficial effects on people's access to services and facilities. The policy states that development proposals in the town centre should include 'above the shop' homes and/or a mix of retail and other leisure and cultural activity. It also supports proposals which include new and existing open spaces, community facilities and meeting places that are accessible to all. In addition, proposals must not eliminate separate access arrangements to upper floorspace, which could be used for residential purposes, as well as community and/or employment uses. Therefore, minor positive effects are expected against SA Objective 3 (Accessibility), SA Objective 4 (Housing) and SA Objective 1 (Health and Wellbeing).

**7.243** The policy encourages improvements to the public realm and tree planting and green infrastructure, which may

have minor positive effects in relation to SA Objective 13  
(Landscape/Townscape).

## Policy LP15 – Tourism

### A. Policy LP15 – Tourism.

No alternatives are put forward at this stage, as the policy is appropriate to local circumstances.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	0
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	++
4. To meet the housing requirements of the whole community.	0
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	+/-
7. To conserve soil and mineral resources.	+
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	+/-
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	+/-
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	+/-
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+/-
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	++
15. To revitalise the Districts' town centres.	+
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	+/-

### Option A: Policy LP15 – Tourism

**7.244** Policy LP15 (Tourism) supports proposals for new tourism facilities, including in rural areas, as well as improvements/extensions to existing facilities. The policy states that proposals for new tourism facilities will be supported where they increase local employment opportunities. Therefore, significant positive effects are expected against SA Objective 14 (Economic Growth) and SA Objective 3 (Accessibility).

**7.245** Mixed minor positive and minor negative effects are also expected in relation to SA Objective 12 (Historic Environment) and SA Objective 13 (Landscape/Townscape) because proposals may be supported where they are of an appropriate scale for their context and protect the landscape and historic environment. The policy also states that

development must safeguard and where possible, enhance the historic interest of an asset, including its setting. However, there could be adverse impacts locally and cumulatively from increased tourism development.

**7.246** A mixed minor positive and minor negative effect is expected against SA Objective 11 (Biodiversity and Geodiversity) because the policy seeks to protect biodiversity and states that proposals in the countryside may be supported where they avoid impacts and mitigate impacts in relation to local ecology, biodiversity, trees and hedgerows. However, these safeguards relate to mitigation only and such activity could disturb biodiversity and disrupt habitats and ecological networks. Compensation may also be difficult to achieve in practice.

**7.247** The policy states that proposals for new tourism facilities, or improvements/extensions to existing facilities, may be supported where facilities are accessible by public transport and facilitate walking and cycling. However, for facilities in the countryside, these do not necessarily have access to public transport and therefore require use of the private car, which results in an increase in CO<sub>2</sub> emissions. Therefore, a mixed minor positive and negative effect is expected against SA Objective 16 (Sustainable Travel), SA Objective 6 (Air and Noise) and SA Objective 9 (Climate Change Mitigation).

**7.248** A minor positive effect is expected against SA Objective 15 (Town Centres) because it is likely that tourism will bring more people into both Districts and especially within the larger more built-up settlements, increasing footfall within the town centres. In addition, the policy requires that proposals enhance the vitality and viability of settlement centres.

**7.249** A minor positive effect is expected in relation to SA Objective 7 (Soils and Minerals) because the policy supports proposals which use brownfield land and/or avoid the best and most versatile agricultural land. Therefore, soil resources are likely to be protected.

## Policy LP16 – Countryside Tourist Accommodation

### A. Policy LP16 – Countryside Tourist Accommodation.

No alternatives are put forward at this stage, as the policy is appropriate to local circumstances.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	0
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	0
4. To meet the housing requirements of the whole community.	+/-
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	+
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	+
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	+
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	+/-
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

### Option A – Policy LP16 – Countryside Tourist Accommodation

**7.250** Policy LP16 (Countryside Tourist Accommodation) supports tourist accommodation in exceptional circumstances. Therefore, a mixed minor positive and minor negative effect is expected against SA Objective 14 (Economic Growth). The policy does not prevent the development of tourist accommodation but also does not make it easy, and a lack of tourist accommodation could discourage visitors to the area.

**7.251** A mixed minor positive and minor negative effect is expected in relation to SA Objective 4 (Housing) because although this policy does not prevent the development of tourist accommodation, it would not be available for permanent residence.

**7.252** In addition, the policy requires that new tourist accommodation is sympathetic to the character of the area, protects and enhances heritage assets and their settings, and protects and enhances biodiversity and geodiversity, whilst also meeting environmental standards. Therefore, minor positive effects are expected in relation to SA Objective 13 (Landscape/Townscape), SA Objective 12 (Historic Environment) and SA Objective 11 (Biodiversity and Geodiversity).

**7.253** In addition, the policy outlines that proposals must minimise the impact of development on climate change, through use of sustainable construction practices and renewable energy technologies. Therefore, minor positive effects are expected in relation to SA Objective 9 (Climate Change Mitigation).

## Policy LP17 – Environmental Protection

### A. Policy LP17 – Environmental Protection.

No alternative options are put forward at this stage, as the policy approach is appropriate to securing environmental protection.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	++
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	0
4. To meet the housing requirements of the whole community.	+/-
5. To conserve and enhance water quality and resources.	++
6. To maintain and where possible improve air quality and reduce noise pollution.	++
7. To conserve soil and mineral resources.	++
8. To promote the sustainable management of waste.	++
9. To reduce contribution to climate change.	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	+/-
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	0
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	0
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	+/-
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

### Option A: Policy LP17 – Environmental Protection

**7.254** Policy LP 17 (Environmental Protection) seeks to protect the environment from development by giving consideration to the efficient use of land, land contamination and instability, pollution, environmental amenity and water quality.

**7.255** The policy prioritises development on previously developed land to minimise the loss of the best and most versatile agricultural land. It outlines that where development needs to take place on greenfield land, the best and most versatile agricultural land should be avoided. Furthermore, it states that development must make efficient use or re-use of existing resources and reduce the lifecycle impact of materials used in construction. This will reduce the amount of waste

generated by development overall. Therefore, a significant positive effect is expected in relation to SA Objective 7 (Soils and Minerals) and SA Objective 8 (Waste).

**7.256** The policy seeks to prevent, or where this is not possible, reduce all forms of possible pollution, including air quality and noise pollution, which will prevent adverse effects on residential amenity. Therefore, significant positive effects are expected against SA Objective 6 (Air and Noise) and SA Objective 1 (Health and Wellbeing).

**7.257** The policy requires development to comply with the SCC Construction Surface Water Management Plan. Therefore, development proposals must demonstrate how they protect and enhance groundwater and surface water features. They must not lead to a deterioration in the quality of

the environment to help achieve the objectives of the Water Framework Directive. Therefore, a significant positive effect is expected against SA Objective 5 (Water).

**7.258** A mixed minor positive and minor negative effect is expected in relation to SA Objective 11 (Biodiversity and Geodiversity) because the policy prioritises the development of previously developed land, and also seeks to prevent noise, air and water pollution that could otherwise harm biodiversity. However, both greenfield land and brownfield land can have biodiversity interest, even if not designated. Therefore, development could have an adverse effect on biodiversity, although this is addressed by Policy LP18.

**7.259** A mixed minor positive and minor negative effect is also expected in relation to SA Objective 4 (Housing) and SA Objective 14 (Economic Growth) because this policy could prevent housing and economic development happening that would otherwise take place, but on the other hand would ensure that an attractive environment is maintained, which attracts economic investment (e.g. tourism) and the delivery of high quality housing.

## Policy LP18 – Biodiversity and Geodiversity

### A. Policy LP18 – Biodiversity and Geodiversity

No alternative options are put forward at this stage, as the policy approach is appropriate to securing biodiversity protection.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	+
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	0
4. To meet the housing requirements of the whole community.	+/-
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	++
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	0
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	++
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	+/-
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	+

### Option A: Policy LP18 – Biodiversity and Geodiversity

**7.260** Policy LP18 (Biodiversity and Geodiversity) seeks to protect biodiversity and geodiversity assets within both Districts. The policy states that development should protect designated sites and potential designated sites. Development that could result in the loss or deterioration of irreplaceable biodiversity or geological features or habitats, such as ancient woodland and ancient trees, will not be supported. The policy outlines that development should protect and improve sites of geological value, particularly sites of international, national and local significance. It also states that development proposals will be supported where they conserve, restore and contribute to the enhancement of biodiversity and geological conservation interests. Reference is also made to measurable

biodiversity net gain, with the policy requiring a minimum 10% increase. Where biodiversity assets cannot be retained or enhanced on site, the Councils will support biodiversity offsetting, to deliver a net gain in biodiversity off-site. Therefore, a significant positive effect is expected against SA Objective 11 (Biodiversity and Geodiversity).

**7.261** A significant positive effect is also expected in relation to SA Objective 13 (Landscape/Townscape) because habitats and biodiversity make a large contribution towards the landscape, and this policy seeks to plan positively for the creation, protection, enhancement and management of local networks of biodiversity with wildlife corridors that connect to existing green infrastructure networks. This is also likely to encourage walking, whilst also having beneficial effects on people's physical and mental health. Therefore, a minor

positive effect is expected against SA Objective 1 (Health and Wellbeing) and SA Objective 16 (Sustainable Travel).

**7.262** Mixed minor positive and minor negative effects are expected in relation to SA Objective 4 (Housing) and SA Objective 14 (Economic Growth) because this policy could prevent housing and economic development happening that would otherwise take place, but on the other hand would ensure that an attractive environment is maintained, which attracts economic investment (e.g. tourism) and the delivery of high quality housing.

## Policy LP19 – Landscape

### A. Policy LP19 – Landscape.

No alternatives are put forward at this stage, as the policy approach is in conformity with the NPPF and is relevant to local circumstances.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	0
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	0
4. To meet the housing requirements of the whole community.	+/-
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	+
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	+
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	++
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	+/-
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

### Option A: Policy LP19 – Landscape

**7.263** Policy LP19 (Landscape) seeks to protect and enhance landscape character. The policy supports proposals that integrate positively with the existing landscape character of the area and reinforce local distinctiveness and identity of individual settlements. It states that development proposals must be sensitive to their landscape and visual amenity impacts (such as dark skies and tranquil areas), subject to siting, design, lighting, use of materials and colour, along with the associated mitigation measures. The policy specifically requires development to protect and enhance landscape character and values, and locally characteristic landscape features. Additionally, where significant landscape or visual impacts are likely to occur, a Landscape and Visual Impact

Assessment or Landscape Appraisal should be prepared. Consideration must also be given to the topographical cumulative impact on landscape sensitivity. Therefore, a significant positive effect is expected in relation to SA Objective 13 (Landscape/Townscape).

**7.264** According to Policy LP19, development must also protect and enhance heritage assets. Therefore, a minor positive effect is expected against SA Objective 12 (Historic Environment).

**7.265** A minor positive effect is also expected in relation to SA Objective 11 (Biodiversity and Geodiversity) because landscape conservation plays an important role in supporting biodiversity.

**7.266** Mixed minor positive and minor negative effects are expected in relation to SA Objective 4 (Housing) and SA Objective 14 (Economic Growth) because this policy could prevent housing and economic development happening that would otherwise take place, but on the other hand would ensure that an attractive environment is maintained, which attracts economic investment (e.g. tourism) and the delivery of high quality housing.

## Policy LP20 – Area of Outstanding Natural Beauty

### A. Policy LP20 – Area of Outstanding Natural Beauty.

No alternatives are put forward at this stage, as the policy approach is in conformity with the NPPF and is relevant to local circumstances.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	0
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	-
4. To meet the housing requirements of the whole community.	+/-
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	+
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	+
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	+
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	++
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	+/-
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

### Option A: Policy LP20 – Area of Outstanding Natural Beauty

**7.267** Policy LP20 (Area of Outstanding Natural Beauty) supports development in or near the AONBs, provided it conserves and enhances the landscape and scenic beauty of the AONBs. The policy states that development must integrate positively with the character of the area and reinforce local distinctiveness and distinctiveness of the AONB. Development must be sensitive to the landscape and visual impacts (including on dark skies and tranquil areas), subject to siting, design, lighting, use of materials and colour, along with associated mitigation measures. Additionally, proposals must be informed by relevant local guidance and the AONB Management Plan. Therefore, overall, Policy LP20 is expected

to have a significant positive effect against SA Objective 13 (Landscape/Townscape).

**7.268** Minor positive effects are expected in relation to SA Objective 6 (Air and Noise), SA Objective 11 (Biodiversity and Geodiversity) and SA Objective 12 (Historic Environment) because conserving and enhancing the landscape and scenic beauty in or near AONBs is likely to have indirect positive effects on air quality and biodiversity, whilst also helping to protect the historic environment from adverse effects associated with development. With regard to the historic environment, the policy also requires consideration to be given to proposals that enhance and protect landscape character and heritage assets. which may positively impact upon heritage assets.

**7.269** A minor positive effect is expected against SA Objective 3 (Accessibility) because the policy supports the provision and maintenance of local services and facilities (including affordable housing) as long as it is commensurate with the character and objectives of the AONB.

**7.270** Mixed minor positive and minor negative effects are expected in relation to SA Objective 4 (Housing) and SA Objective 14 (Economic Growth) because this policy could prevent housing and economic development happening that would otherwise take place, but on the other hand would ensure that an attractive environment is maintained, which attracts economic investment (e.g. tourism) and the delivery of high quality housing. AONBs tend to be characterised by reduced housing supply, which can make it difficult to meet local affordable housing needs in AONB settlements.

**7.271** The policy states that proposals for new tourism and visitor related development within the AONB will be supported where it reflects the intrinsic qualities and respects the character of the AONB. Therefore, minor positive effects are expected against SA Objective 14 (Economic Growth).

## Policy LP21 – The Historic Environment

### A. Policy LP21 – The Historic Environment.

No alternatives are put forward at this stage, as the policy approach is proportionate and relevant to local circumstances.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	0
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	0
4. To meet the housing requirements of the whole community.	+/-
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	0
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	++
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	+/-
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

### Option A: Policy LP21 – The Historic Environment

**7.272** Policy LP21 (The Historic Environment) seeks to protect and enhance the historic environment. In order to achieve this, the policy states that harm to heritage assets should be avoided and only where harm cannot be avoided, should mitigation be considered. The policy goes on to state that proposals which potentially affect heritage assets should have regard to all relevant Historic England Advice and Guidance. Where an application potentially affects heritage assets, the Councils will require the applicant to submit a heritage statement. Likewise, where development includes (or has the potential to include) heritage assets with archaeological interest, a desk-based assessment must be undertaken and where necessary, a field evaluation by a suitably qualified person. These measures are all expected to help reduce

adverse effects on the historic environment. Therefore, overall, a significant positive effect is expected against SA Objective 12 (Historic Environment).

**7.273** Policy LP21 also states that proposals which contribute to local distinctiveness by respecting the built form and scale of heritage assets through appropriate design and materials, will be supported. This is expected to have an indirect beneficial effect on the landscape. Therefore, a minor positive effect is expected against SA Objective 13 (Landscape/Townscape).

**7.274** Mixed minor positive and minor negative effects are expected in relation to SA Objective 4 (Housing) and SA Objective 14 (Economic Growth) because this policy could prevent housing and economic development happening that would otherwise take place, but on the other hand would

ensure that an attractive environment is maintained, which attracts economic investment (e.g. tourism) and the delivery of high quality housing.

## Policy LP22 – Change in Land Use for Equestrian or Other Animal/Rural Land Base Uses

A. Policy LP22 – Change in Land Use for Equestrian or Other Animal/Rural Land Base Uses.

No alternatives are put forward at this stage, as the policy approach is proportionate and relevant to local circumstances.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	+
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	+
4. To meet the housing requirements of the whole community.	+
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	+
8. To promote the sustainable management of waste.	+
9. To reduce contribution to climate change.	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	+
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	+
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	+/-
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

### Option A: Policy LP22 – Change in Land Use for Equestrian or Other Animal/Rural Land Base Uses

**7.275** Policy LP22 (Change in Land Use for Equestrian or Other Animal/Rural Land Base Uses) supports the change in use of land for equestrian uses or other animal/rural land-based uses in the countryside, provided certain criteria are met. Therefore, this policy helps support rural businesses. This could potentially improve accessibility to employment opportunities for rural communities, with a minor positive effect against SA Objective 3 (Accessibility).

**7.276** Reference is made to residential accommodation in the policy, which will be supported provided there is a need for the accommodation and the location is considered suitable. Therefore, minor positive effects are expected in relation to SA Objective 4 (Housing).

**7.277** According to the policy, the layout, size, scale, design, materials and siting of any proposed building or equipment must not create serious adverse impacts on the natural and local environment or the appearance of the locality. With regard to landscape, any new buildings should be located within or adjacent to an existing group of buildings to have minimal impact within the landscape. Proposals must respect and enhance the character of the surrounding landscape. Therefore, a minor positive effect is expected in relation to SA Objective 13 (Landscape/Townscape).

**7.278** With regard to the natural environment and biodiversity, proposals must not adversely affect or damage any significant trees and hedgerows that contribute to the environmental quality and visual amenity benefits of the rural location. More generally, development must not create significant detriment to biodiversity and geodiversity. Therefore, a minor positive

effect is expected against SA Objective 11 (Biodiversity and Geodiversity).

**7.279** As set out in Policy LP22, proposals should re-use existing buildings where appropriate. Furthermore, proposals must include a satisfactory scheme for the disposal of waste. Therefore, a minor positive effect is expected in relation to SA Objective 8 (Waste).

**7.280** Minor positive effects are also expected against SA Objective 7 (Soils and Minerals) because development should not result in the loss of best and most versatile agricultural land. Applicants must demonstrate that there are no suitable alternative sites on lower grade land.

**7.281** In addition, the policy outlines that proposals must protect and enhance any existing heritage assets and their setting. As such, a minor positive effect is likely in relation to SA Objective 12 (Historic Environment)

**7.282** The policy stipulates that any adverse effects on residential amenity as a result of development should be avoided. Therefore, a minor positive effect is likely in relation to SA Objective 1 (Health and Wellbeing).

**7.283** A mixed minor positive and minor negative effect is expected in relation to SA Objective 14 (Economic Growth) because this policy could prevent economic development happening that would otherwise take place, but on the other hand would ensure that an attractive environment is maintained, which would attract economic investment such as tourism.

## Policy LP23 – Agricultural Land to Residential Garden Land

### A. Policy LP23 – Agricultural Land to Residential Garden Land.

No alternatives are put forward at this stage, as the policy approach is proportionate and relevant to local circumstances.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	0
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	+
4. To meet the housing requirements of the whole community.	0
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	+
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	+
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	0
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

### Option A: Policy LP23 – Agricultural Land to Residential Garden Land

**7.284** Policy LP23 (Agricultural Land to Residential Garden Land) supports the change in use of agricultural land to residential garden land or land ancillary to a residential dwelling.

**7.285** Change in use of agricultural land to residential garden land or land ancillary to a residential dwelling is supported provided that a proposal does not result in the irreversible loss of best and most versatile agricultural land. Therefore, a minor positive effect is expected in relation to SA Objective 7 (Soils and Minerals).

**7.286** Proposals will also be supported provided they have no adverse impact on biodiversity. Proposals must not intrude

into the open countryside or result in the loss of trees and hedgerows which contribute to the character of the area. Additionally, sites must not threaten designated or priority habitats, in addition to the viability of farm holdings as a result of the breaking up of agricultural land. Therefore, minor positive effects are expected in relation to SA Objective 11 (Biodiversity and Geodiversity).

**7.287** With regard to the landscape, proposals must not have an adverse impact on landscape characteristics, with close consideration given to the location, size and scale of proposals. Therefore, minor positive effects are expected in relation to SA Objective 13 (Landscape/Townscape).

**7.288** The policy is also considered to have a minor positive effect on SA Objective 3 (Accessibility) because proposals are required to not impact on public rights of way.

## Policy LP24 – New Agricultural/Rural Buildings in the Countryside

### A. Policy LP24 – New Agricultural/Rural Buildings in the Countryside.

No alternatives are put forward at this stage.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	+
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	0
4. To meet the housing requirements of the whole community.	0
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	+
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	+
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	+/-
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	+/-

### Option A: Policy LP24 – New Agricultural/Rural Buildings in the Countryside

**7.289** Policy LP24 (New Agricultural/Rural Buildings in the Countryside) resists development in isolated and remote areas, unless considered suitable. The policy may encourage development related to rural businesses because applications must take into consideration the compatibility of a proposal to any existing agricultural farm and/or business. However, due to the restrictions on development as a result of this policy, it may prevent economic development happening that would otherwise take place. Therefore, a mixed minor positive and minor negative effect is likely against SA Objective 14 (Economic Growth).

**7.290** Minor positive effects are expected in relation to SA Objectives 11 (Biodiversity and Geodiversity), 12 (Historic

Environment) and 13 (Landscape/Townscape) because applications must take into consideration landscape design, habitat sites and protected species, and heritage assets and their settings. A minor positive effect is also expected in relation to SA Objective 1 (Health and Wellbeing) because development must not result in adverse effects on residential amenity.

**7.291** A mixed minor positive and minor negative effect is expected in relation to SA Objective 16 (Sustainable Travel) because the policy resists development in isolated, rural areas and therefore people are more likely to be based in central urban areas where services are located and therefore people do not have to travel long distances via the private car. However, the policy also supports development in rural areas, provided it is considered suitable. This could increase use of the private car. There is a specific clause that states that it

must be demonstrated that proposals would not cause significant levels of traffic, particularly lorries/HGVs on rural roads which, from responses to the consultation on the SA Scoping Report, is of considerable concern to local residents.

## Policy LP25 – Sustainable Construction and Design

### A. Policy LP25 – Sustainable Construction and Design.

No alternative options are put forward at this stage, as the policy approach is appropriate to securing environmental protection and responds to local circumstances.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	+
2. To maintain and improve levels of education and skills in the population overall.	+
3. To reduce poverty and social exclusion and ensure access to jobs and services.	+
4. To meet the housing requirements of the whole community.	+/-
5. To conserve and enhance water quality and resources.	++
6. To maintain and where possible improve air quality and reduce noise pollution.	++
7. To conserve soil and mineral resources.	+
8. To promote the sustainable management of waste.	+
9. To reduce contribution to climate change.	++
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	++
11. To conserve and enhance biodiversity and geodiversity.	+
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	0
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscape.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	+

### Option A: Policy LP25 – Sustainable Construction and Design

**7.292** Policy LP25 (Sustainable Construction and Design) promotes sustainable construction and design in development. The policy is expected to reduce any contribution to climate change by minimising dependence on fossil fuels and adopting a sustainable approach to energy use, whilst also demonstrating climate change adaptation. The policy specifically aims to achieve a reduction in CO<sub>2</sub> emissions, whilst also adopting effective design principles that reduce energy use through shading and landscaping, site layout and building orientation. The incorporation of energy efficiency measures is also encouraged and non-residential development of 1,000sqm and above must achieve a

minimum of BREEAM 'Very Good' standard or equivalent, and development must be designed to incorporate flood mitigation measures such as SuDS. Therefore, a significant positive effect is expected against SA Objectives 9 (Climate Change Mitigation) and 10 (Climate Change Adaptation).

**7.293** Policy LP25 requires development to meet high water efficiency standards. Water reuse and recycling, in addition to rainwater and stormwater harvesting is also encouraged, with significant positive effects on SA Objective 5 (Water).

**7.294** The policy also seeks to achieve considerable reductions in CO<sub>2</sub> emissions, whilst also encouraging on-site renewable and other low carbon energy generation. There is a requirement to submit an energy statement as part of an application, to explore the CO<sub>2</sub> savings that can be achieved

with each source of energy, to allow the greatest reduction in CO<sub>2</sub>. Therefore, a significant positive effect is expected in relation to SA Objective 6 (Air and Noise).

**7.295** As mentioned before, the policy requires non-residential development of 1,000sqm and above to achieve a minimum of BREEAM 'Very Good' standard or equivalent. This could result in a minor positive effect on SA Objective 1 (Health and Wellbeing) because BREEAM gives recognition to healthy and safe internal and external environments for occupants. It would also provide opportunities for training and skills development and is therefore expected to have a minor positive effect on SA Objective 2 (Education and Skills), in addition to SA Objective 3 (Accessibility) by generating increased employment opportunities.

**7.296** Minor positive effects are also expected in relation to SA Objective 7 (Soils and Minerals), SA Objective 13 (Landscape/Townscape), SA Objective 11 (Biodiversity and Geodiversity), SA Objective 8 (Waste), SA Objective 13 (Landscape/Townscape) and SA Objective 16 (Sustainable Travel). This is due to the fact BREEAM encourages sustainable land use (i.e. use of brownfield land), which reduces the loss of undeveloped land and its associated impacts on the landscape, in addition to habitat protection and creation, and improvement of long-term biodiversity for the site and surrounding land. With regard to waste, BREEAM encourages the sustainable management (and reuse where feasible) of construction, operational waste and waste through future maintenance and repairs associated with the building structure. BREEAM also focuses on the accessibility of public transport and other alternative transport solutions by providing cyclist facilities and amenities to support this with the intention to reduce journeys made by car.

**7.297** According to Policy LP25, any risk associated with future climate change must be planned for as part of the layout of the scheme and design of its buildings to ensure longer term resilience. However, specific reference is not made to flood risk as a result of a changing climate. Therefore, a minor positive but uncertain effect is expected in relation to SA Objective 10 (Climate Change Adaptation).

**7.298** A mixed minor positive and minor negative effect is expected in relation to SA Objective 4 (Housing) because the policy makes provision for energy and water efficient homes (thereby helping to keep bills low) but on the other hand could compromise affordability or the provision of affordable homes if construction costs rise.

## Policy LP26 – Design and Residential Amenity

### A. Policy LP26 – Design and Residential Amenity.

No alternative options are put forward at this stage, as the policy approach is in conformity with the NPPF and appropriate to local circumstances.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	++
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	+
4. To meet the housing requirements of the whole community.	+
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	+
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	+
9. To reduce contribution to climate change.	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	+
11. To conserve and enhance biodiversity and geodiversity.	++
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	+
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	++

### Option A: Policy LP26 – Design and Residential Amenity

**7.299** Policy LP26 (Design and Residential Amenity) encourages high quality design in development, in addition to protecting residential amenity. The policy states that all new development must be designed for health and wellbeing, in addition to safety. Development must be designed in a way that accommodates the ageing population and follows Dementia-Friendly Design principles, whilst also ensuring amenity. With regard to safety, development must design out crime through active frontages, whilst also creating an environment for people to feel safe with a strong community focus. Therefore, a significant positive effect is expected in relation to SA Objective 1 (Health and Wellbeing).

**7.300** A significant positive effect is also expected in relation to SA Objective 16 (Sustainable Travel) because the policy promotes development that prioritises walking and cycling, in addition to use of public transport.

**7.301** With regard to the natural environment, development is required to safeguard natural features of biodiversity interest, such as trees or hedgerows. Development must also incorporate soft landscaping, street trees and public open space that creates and connects to green infrastructure. As such, a significant positive effect is expected in relation to SA Objective 11 (Biodiversity and Geodiversity).

**7.302** Development is required to be of an appropriate scale that responds to and safeguards the existing character of an area, whilst also creating interest itself. Therefore, a minor

positive effect is expected in relation to SA Objective 13 (Landscape/Townscape). Development is also required to safeguard historic assets and built features of merit, with minor positive effects against SA Objective 12 (Historic Environment).

**7.303** Policy LP26 requires all new development to meet the space standards set by government. There is also a requirement for consideration to be given to permeability, street composition and connectivity, all of which improve accessibility. Therefore, a minor positive effect is expected against SA Objective 3 (Accessibility).

**7.304** As mentioned previously, development must be designed for health and wellbeing, and this includes giving consideration to the access needs of older or disabled people. Policy LP26 specifically states that a reasonable standard of accommodation should be delivered for occupants in terms of privacy, including garden space. This will ensure that houses are designed to a high standard and include such things as a private garden, meeting different people's needs. Therefore, a minor positive effect is expected in relation to SA Objective 4 (Housing).

**7.305** A minor positive effect is expected in relation to SA Objective 6 (Air and Noise) because the policy makes reference to noise pollution and the need to protect the residential amenity of occupiers.

**7.306** A minor positive effect is also expected against SA Objective 8 (Waste) because the policy requires bin storage, including recycling and re-use bins, to be included as part of development.

**7.307** Lastly, a minor positive effect is expected in relation to SA Objective 10 (Climate Change Adaptation) because the policy encourages high quality design and architecture with climate change adaptation, such as measures to protect against extreme weather events including heat and excessive rain.

## Policy LP27 – Energy Sources, Storage and Distribution

### A. Policy LP27 – Energy Sources, Storage and Distribution.

No alternative options are put forward at this stage, as the policy approach is in conformity with the NPPF and appropriate to local circumstances.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	+
2. To maintain and improve levels of education and skills in the population overall.	+
3. To reduce poverty and social exclusion and ensure access to jobs and services.	0
4. To meet the housing requirements of the whole community.	0
5. To conserve and enhance water quality and resources.	+
6. To maintain and where possible improve air quality and reduce noise pollution.	+
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	++
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	+
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	+
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	++
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

### Option A: Policy LP27 – Energy Sources, Storage and Distribution

**7.308** Policy LP27 (Energy Sources, Storage and Distribution) promotes the use of renewable, decentralised and community energy generation proposals. Therefore, a significant positive effect is expected against SA Objective 9 (Climate Change Mitigation). A significant positive effect is also expected in relation to SA Objective 14 (Economic Growth) because the policy will help create local jobs and support the transition to a green economy.

**7.309** The transition to a green economy will require upskilling or retraining in green jobs that will become increasingly relevant and in demand in the future. Therefore, a minor

positive effect is likely against SA Objective 2 (Education and Skills).

**7.310** Proposals for renewable and low carbon energy will be supported provided they have no adverse impact on the landscape, the natural environment and the historic environment. Where they are located in an AONB, a nature conservation site or the setting of a heritage asset, applicants must demonstrate that any harm to these designated areas will be effectively mitigated. They must also demonstrate that there are no alternative sites within the District that can be used. Therefore, a minor positive effect is expected against SA Objective 11 (Biodiversity and Geodiversity), SA Objective 12 (Historic Environment) and SA Objective 13 (Landscape/Townscape). A minor positive effect is also

expected against SA Objective 5 (Water) because the policy states that proposals must not impact on drainage.

**7.311** Lastly, a minor positive effect is expected against SA Objective 6 (Air and Noise) and SA Objective 1 (Health and Wellbeing) because renewable energy schemes are less polluting than energy generated from fossil fuels and are therefore likely to help improve people's health by reducing pollution levels. Proposals must also not result in adverse impacts on residential amenity.

## Policy LP28 – Water Resources and Infrastructure

### A. Policy LP28 – Water Resources and Infrastructure.

No alternative options are put forward at this stage, as the policy approach is in conformity with the NPPF and appropriate to local circumstances.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	0
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	0
4. To meet the housing requirements of the whole community.	0
5. To conserve and enhance water quality and resources.	++
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	++
11. To conserve and enhance biodiversity and geodiversity.	+
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	0
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscape.	0
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

### Option A: Policy LP28 – Water Resources and Infrastructure

**7.312** Policy LP28 (Water Resources and Infrastructure) is expected to have a significant positive effect in relation to SA Objective 5 (Water). This is due to the fact the policy seeks to ensure the sustainable use of water resources in new development by encouraging the incorporation of water efficiency and re-use measures. The policy also requires that developers consider the impact of development on water resources and the capacity of water supply. The policy outlines that a holistic approach to water management should be taken, and that development should comply with the relevant statutory environmental body policy on culverts.

**7.313** A significant positive effect is also expected in relation to SA Objective 10 (Climate Change Adaptation) because the policy encourages water efficiency and the use of surface water drainage, which will help prevent surface water flooding. Improving water efficiency will also help adapt to lower water availability, which is likely to occur as a result of climate change.

**7.314** Lastly, a minor positive effect is expected in relation to SA Objective 11 (Biodiversity and Geodiversity) because the policy promotes the use of surface water drainage, such as SuDS, to provide additional environmental benefits, including biodiversity benefits through the provision of new habitats. Furthermore, the policy says that proposals must not result in any adverse effects on the integrity of the Stour and Orwell SPA and Ramsar, and the Suffolk Coast and Heaths AONB.

## Policy LP29 – Flood Risk and Vulnerability

### A. Policy LP29 – Flood Risk and Vulnerability.

No alternative options are put forward at this stage, as the policy approach is in conformity with the NPPF and appropriate to local circumstances.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	+
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	0
4. To meet the housing requirements of the whole community.	+
5. To conserve and enhance water quality and resources.	++
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	+
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	++
11. To conserve and enhance biodiversity and geodiversity.	+
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	+
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	+
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

### Option A: Policy LP29 – Flood Risk and Vulnerability

**7.315** Significant positive effects are expected in relation to SA Objective 5 (Water) and SA Objective 10 (Climate Change Adaptation) as this policy seeks to minimise flood risk arising from development proposals and ensure that flood risk is not increased elsewhere. In addition, the policy requires mitigation to be provided against existing and potential flood risk, including the incorporation of measures such as SuDS, rainwater harvesting and greywater recycling into new developments. This is likely to have beneficial effects on people's mental health at the same time as helping to ensure their safety. Therefore, a minor positive effect expected in relation to SA Objective 1 (Health and Wellbeing). The

implementation of SuDS may also result in enhanced water quality.

**7.316** A minor positive effect is expected in relation to SA Objective 4 (Housing) because minimising flood risk and implementation of flood mitigation measures is likely to protect homes from flooding, whilst also avoiding damage to property. Likewise, the measures outlined above are also likely to protect historic assets from flood damage and erosion, whilst also preventing their loss. Therefore, a minor positive effect is also likely in relation to SA Objective 12 (Historic Environment).

**7.317** In addition, minor positive effects are expected in relation to SA Objective 11 (Biodiversity and Geodiversity) and SA Objective 13 (Landscape/Townscape) as the policy seeks

to ensure SuDS provide multifunctional benefits including for biodiversity and landscape, through the provision of new landscape features and habitats. SuDS also have the ability to prevent soil erosion and therefore a minor positive effect is expected in relation to SA Objective 7 (Soils and minerals).

**7.318** Lastly, a minor positive effect is expected in relation to SA Objective 14 (Economic Growth) because reducing flood risk will help prevent economic disruption and damage to property.

## Policy LP30 – Designated Open Spaces

A. Policy LP30 – Designated Open Spaces.

B. Carry forward existing designations in Local Plans / Core Strategies into the Joint Local Plan.

SA Objective	A.	B.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	++	++
2. To maintain and improve levels of education and skills in the population overall.	0	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	+	+
4. To meet the housing requirements of the whole community.	0	0
5. To conserve and enhance water quality and resources.	+?	+?
6. To maintain and where possible improve air quality and reduce noise pollution.	+?	+?
7. To conserve soil and mineral resources.	+?	+?
8. To promote the sustainable management of waste.	0	0
9. To reduce contribution to climate change.	+?	+?
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	+?	+?
11. To conserve and enhance biodiversity and geodiversity.	+?	+?
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	+?	+?
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+?	+?
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0	0
15. To revitalise the Districts' town centres.	0	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	+?	+/-

### Option A: Policy LP30 – Designated Open Spaces

**7.319** Policy LP30 (Designated Open Spaces) is expected to have a significant positive effect in relation to SA Objective 1 (Health and Wellbeing) because it seeks to protect designated open space from development, and outlines criteria where development will be permitted, including where the development will support the enjoyment and functionality of the space, and/or will provide alternative space or sports and recreation provision. In addition, the policy requires developments in excess of one hectare to provide on-site open space provision. As such, increasing provision and enhancing open space helps to create a healthy living environment and improves quality of life for all. Furthermore, by maintaining and improving accessibility to open space, the

policy is expected to have a minor positive effect in relation to SA Objective 3 (Accessibility).

**7.320** Minor positive effects are also expected in relation to SA Objective 11 (Biodiversity and Geodiversity), SA Objective 13 (Landscape/Townscape) and SA Objective 12 (Historic Environment), as provision of open space could provide habitats to support biodiversity and enhance the quality and character of the townscape and landscape, whilst also protecting the historic environment from adverse effects associated with development. Furthermore, the policy supports proposals which improve the biodiversity interest of designated open space, including as part of wider ecological networks. However, uncertainty is attached to these objectives as the positive effects depend on the nature of the open space provided.

**7.321** Minor positive effects are expected against SA Objective 5 (Water) and SA Objective 7 (Soils and Minerals) as the protection and provision of new open space may help maintain and/or improve soil and water quality. It may also prevent flood risk, particularly resulting from surface water, by maximising areas of permeable land, having minor positive effects in relation to SA Objective 10 (Climate Change Adaptation). Furthermore, the provision of open space could encourage people to use local open space rather than travelling elsewhere, which is expected to have minor positive effects in relation to SA Objective 6 (Air and Noise), SA Objective 9 (Climate Change Mitigation) and SA Objective 16 (Sustainable Travel). However, uncertainty is attached to each of these objectives as the positive effects depend on the nature of the open space provided.

**Option B: Carry forward existing designations in Local Plans / Core Strategies into the Joint Local Plan.**

**7.322** Option B (Carry forward existing designations in Local Plans / Core Strategies into the Joint Local Plan) would rely on existing designations in each District being carried through to the draft JLP. Neither District has a list of designated open spaces in their adopted Local Plan documents. However, a small number of Saved Policies from the Babergh Local Plan (2006) safeguard public open space. Likewise, the Mid Suffolk Local Plan (1998) contains a list of Visually Important Open Spaces that must be protected from development, in addition

to referencing Recreational Open Space. Overall, there are not as many spaces as that designated in the draft JLP under Option A, and their typologies have not been clearly defined.

**7.323** Option B is not based on up-to-date information and may therefore result in lower delivery of open space when compared to Option A. It is also likely that Option B would not protect as many open spaces as Option A. Despite this, the aim of Option B is the same as Option A in that it seeks to protect open space from development. Overall, a significant positive effect is expected against SA Objective 1 (Health and Wellbeing), whilst minor positive but uncertain effects are expected in relation to SA Objective 11 (Biodiversity and Geodiversity), SA Objective 13 (Landscape/Townscape), SA Objective 12 (Historic Environment), SA Objective 5 (Water), SA Objective 7 (Soils and Minerals) and SA Objective 10 (Climate Change Adaptation) for the reasons described above.

**7.324** Mixed minor positive and minor negative but uncertain effects are expected in relation to SA Objective 3 (Accessibility), SA Objective 16 (Sustainable Travel), SA Objective 6 (Air and Noise) and SA Objective 9 (Climate Change Mitigation) because there are a smaller number of open spaces under Option B than Option A, and therefore people may need to travel further via the private car to reach these open spaces. The use of the private car is likely to have an adverse effect on air quality, whilst also contributing to CO<sub>2</sub> emissions.

**Discounted alternative options**

- **Option B: Carry forward existing designations in Local Plans / Core Strategies into the Joint Local Plan:** The Open Space Assessment (2019) provides new evidence to discount this option.

## Policy LP31 – Services and Facilities Within the Community

- A. Policy LP31 – Services and Facilities Within the Community.  
B. Alternative Option - Leave the protection of community services and facilities to the NPPF.  
C. Alternative Option – Restrict the loss of all community facilities.

SA Objective	A.	B.	C.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	++	0	++
2. To maintain and improve levels of education and skills in the population overall.	++	0	++
3. To reduce poverty and social exclusion and ensure access to jobs and services.	++	0	++
4. To meet the housing requirements of the whole community.	+	0	-
5. To conserve and enhance water quality and resources.	0	0	0
6. To maintain and where possible improve air quality and reduce noise pollution.	+	0	+
7. To conserve soil and mineral resources.	0	0	0
8. To promote the sustainable management of waste.	0	0	0
9. To reduce contribution to climate change.	+	0	+
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0	0	0
11. To conserve and enhance biodiversity and geodiversity.	0	0	0
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	+	0	+
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+	0	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	+	0	+
15. To revitalise the Districts' town centres.	+	0	+
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	+	0	+

### Option A: Policy LP31 – Services and Facilities Within the Community

**7.325** Policy LP31 (Services and Facilities Within the Community) is expected to have significant positive effects in relation to SA Objective 1 (Health and Wellbeing), SA Objective 2 (Education and Skills) and SA Objective 3 (Accessibility) as this policy promotes the protection, improvement and provision of new and existing community services and facilities, including healthcare, educational, and social facilities. The policy states that where such facilities will be lost, compensatory alternative facilities will be provided.

**7.326** Minor positive effects also expected in relation to SA Objective 6 (Air and Noise) and SA Objective 16 (Sustainable Travel) as the policy would reduce the need to travel to other nearby settlements by maintaining and providing new local facilities and services. In addition, enhancing existing and providing new services and facilities within the community may encourage economic growth and revitalise town centres, having minor positive effects in relation to SA Objective 14 (Economic Growth) and SA Objective 15 (Town Centres).

**7.327** A minor positive effect is also expected in relation to SA Objective 4 (Housing) as the policy permits the conversion of community facilities to residential properties if it complies with all relevant policies within the Joint Local Plan.

**7.328** In addition, the policy requires that proposals are sympathetic to the surrounding landscape and townscape, with no adverse effects on heritage assets and their setting. Therefore, minor positive effects are identified in relation to SA Objective 12 (Historic Environment) and SA Objective 13 (Landscape/Townscape).

**7.329** Furthermore, the policy outlines that proposals must minimise the impact of development on climate change through the use of sustainable construction practices and renewable energy technologies. Therefore, a minor positive effect is expected in relation to SA Objective 9 (Climate Change Mitigation).

**Option B: Leave the protection of community services and facilities to the NPPF**

**7.330** A negligible effect is expected against all SA Objectives for Option B because the NPPF forms part of the baseline against which the policies are appraised.

**Option C: Restrict the loss of all community facilities**

**7.331** This policy option is expected to have the same significant positive effects as the preferred approach in relation to SA Objective 1 (Health and Wellbeing), SA Objective 2 (Education and Skills) and SA Objective 3 (Accessibility) as the policy option seeks to restrict the loss of community services and facilities.

**7.332** As was the case with Option A, minor positive effects are expected against SA Objective 6 (Air and Noise), SA Objective 9 (Climate Change Mitigation), SA Objective 12 (Historic Environment), SA Objective 13 (Landscape/Townscape) SA Objective 16 (Sustainable Travel), SA Objective 14 (Economic Growth) and SA Objective 15 (Town Centres) under this option for the reasons set out above.

**7.333** A minor negative effect is expected in relation to SA Objective 4 (Housing) as the restrictive nature of this policy would prevent the redevelopment of underused facilities for residential purposes.

**Discounted alternative options**

- **Option B: Leave the protection of community services and facilities to the NPPF:** Concern that this would not provide enough protection to valued community facilities.
- **Option C: Restrict the loss of all community facilities:** This could result in buildings previously used as community facilities being left vacant for a prolonged period of time.

## Policy LP32 – Safe, Sustainable and Active Transport

### A. Policy LP32 – Safe, Sustainable and Active Transport.

No alternative options are put forward at this stage, as the policy approach is in conformity with the NPPF and appropriate to local circumstances..

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	++
2. To maintain and improve levels of education and skills in the population overall.	0
3. To reduce poverty and social exclusion and ensure access to jobs and services.	+
4. To meet the housing requirements of the whole community.	0
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	++/-
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	++/-
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	+
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	0
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscape.	0
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0
15. To revitalise the Districts' town centres.	+
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	++

### Option A: Policy LP32 – Safe, Sustainable and Active Transport

**7.334** Policy LP32 (Safe, Sustainable and Active Transport) is expected to have a significant positive effect in relation to SA Objective 16 (Sustainable Travel) as the policy aims to increase the use of, enhance and improve accessibility to sustainable and active modes of transport, such as using public transport, walking and cycling, instead of private vehicles. A significant positive effect is also identified against SA Objective 1 (Health and Wellbeing) as the policy seeks to encourage active travel, such as walking and cycling, which may encourage people to lead healthier lifestyles.

**7.335** In addition, mixed significant positive and minor negative effects are expected in relation to SA Objective 6 (Air

and Noise) and SA Objective 9 (Climate Change Mitigation). The policy promotes the use of electric vehicles, and sustainable and active modes of travel which would reduce journeys made by private vehicles. This therefore is likely to reduce air and noise pollution, and the release of greenhouse gas emissions. However, the policy requires proposals to incorporate car parking facilities where necessary, which may encourage people to travel by private vehicle instead of more sustainable modes. Furthermore, the policy promotes multi-modal interchanges (e.g. park and ride) which may also encourage people to make part of their journey by private vehicle instead of entirely by sustainable modes.

**7.336** Minor positive effects are expected in relation to SA Objective 3 (Accessibility) and SA Objective 15 (Town Centres) as the policy aims to improve accessibility and

connectivity of sustainable and active transport modes, which may provide improved access to services, facilities, town centres and employment opportunities. Additionally, the policy seeks to enhance the existing PRoW network, and provide more linkages to existing pedestrian and cycle networks, which may improve accessibility to areas of open spaces and services and facilities. The policy also states that pedestrian routes should be suitable for disabled people and those with impaired mobility. Therefore, a minor positive effect is likely in relation to SA Objective 3 (Accessibility).

**7.337** In addition, minor positive effects are expected in relation to SA Objective 11 (Biodiversity and Geodiversity) as the promotion of active transport corridors such as footpaths and cycleways should, where possible, be tied in with the green infrastructure network to enable greater connectivity of habitats and species movement.

## Policy LP33 – Managing Infrastructure Provision

### A. Policy LP33 – Managing Infrastructure Provision.

No alternatives are put forward at this stage, as the policy approach is necessary, in conformity with the NPPF and is relevant to local circumstances.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	++
2. To maintain and improve levels of education and skills in the population overall.	++
3. To reduce poverty and social exclusion and ensure access to jobs and services.	++
4. To meet the housing requirements of the whole community.	+
5. To conserve and enhance water quality and resources.	++
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	++
9. To reduce contribution to climate change.	+
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	++
11. To conserve and enhance biodiversity and geodiversity.	0
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	0
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscape.	0
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	+
15. To revitalise the Districts' town centres.	+
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	+/-

### Option A: Policy LP33 – Managing Infrastructure Provision

**7.338** Policy LP33 (Managing Infrastructure Provision) is expected to have significant positive effects in relation to SA Objective 1 (Health and Wellbeing), SA Objective 2 (Education and Skills), SA Objective 3 (Accessibility), SA Objective 5 (Water), SA Objective 8 (Waste) and SA Objective 10 (Climate Change Adaptation) as the policy requires that all new development must be supported by, and have good access to infrastructure, and that planning permission will only be granted if there is sufficient infrastructure capacity to support and meet the necessary infrastructure requirements arising from the proposed development, including consideration of existing and cumulative impacts. As such, this policy will help

provide for the infrastructure needs associated with new development, such as schools, community and healthcare facilities, water supply and treatment infrastructure, SuDS and waste management facilities. This is likely to improve infrastructure associated with new housing development, with a minor positive effect on SA Objective 4 (Housing),

**7.339** A mixed minor positive and minor negative effect is expected in relation to SA Objective 16 (Sustainable Travel) as the policy may help provide for transport infrastructure such as public transport, cycle paths and walkways, which may reduce journeys made by private vehicle. However, it may also include upgrades to roads and junctions, which could make travel via the private car easier. A minor positive effect is expected in relation to SA Objective 9 (Climate Change Mitigation) because although infrastructure delivery may

promote travel via the private car, it is also likely to promote more sustainable modes of travel, in addition to managing risks associated with flooding. The provision of transport infrastructure may improve accessibility to local centres, having minor positive effects on SA Objectives 14 (Economic Growth) and 15 (Town Centres).

## Policy LP34 – Health and Education Provision

### A. Policy LP34 – Health and Education Provision.

No alternatives are put forward at this stage, as the policy approach is necessary, in conformity with the NPPF and is relevant to local circumstances.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	++
2. To maintain and improve levels of education and skills in the population overall.	++
3. To reduce poverty and social exclusion and ensure access to jobs and services.	+
4. To meet the housing requirements of the whole community.	-
5. To conserve and enhance water quality and resources.	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	0
9. To reduce contribution to climate change.	+
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0
11. To conserve and enhance biodiversity and geodiversity.	0
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	0
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	+

### Option A: Policy LP34 – Health and Education Provision

**7.340** Policy LP34 (Health and Education Provision) is expected to have significant positive effects in relation to SA Objective 1 (Health and Wellbeing) and SA Objective 2 (Education and Skills) as this policy seeks to protect sites with a health and educational use from development of other uses, and states that the Council will apply the presumption in favour of development for these uses. In addition, by protecting sites for educational facilities, the policy may have significant positive effects in relation to SA Objective 3 (Accessibility) by providing educational facilities which could improve the skillset of the population and help reduce rates of unemployment. The policy states that the Council will be supportive of proposals that enable dual use of facilities within

the school grounds which can also be used by the community and agreed under a Community Use Agreement. This therefore may further promote accessibility and improve health and well-being of the community.

**7.341** The policy outlines the criteria for the change of use of educational and health sites, including ensuring the development of sites would not reduce the current and future playing field provision to unacceptable levels. The protection of playing fields will likely have minor positive effects in relation to SA Objective 13 (Landscape/Townscape), as they can contribute to the character of the local landscape and townscape.

**7.342** In addition, minor positive effects are expected in relation to SA Objective 16 (Sustainable Travel) and SA

Objective 9 (Climate Change Mitigation) as it encourages early years settings and schools be placed in the best possible location to promote the use of sustainable travel. This may reduce dependence on car use, thus reducing the release of greenhouse gas emissions.

**7.343** Minor negative effects are identified in relation to SA Objective 4 (Housing), as the restrictive nature of this policy may prevent the development of health and education sites for housing, unless it can meet the specified criteria outlined in the policy.

## Policy LP35 – Developer Contributions and Planning Obligations

### A. LP35 – Developer Contributions and Planning Obligations.

No alternatives are put forward at this stage, as the policy approach is necessary, in conformity with the NPPF and is relevant to local circumstances.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	+?
2. To maintain and improve levels of education and skills in the population overall.	+?
3. To reduce poverty and social exclusion and ensure access to jobs and services.	+?
4. To meet the housing requirements of the whole community.	++
5. To conserve and enhance water quality and resources.	+?
6. To maintain and where possible improve air quality and reduce noise pollution.	+?
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	+?
9. To reduce contribution to climate change.	+?
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	+?
11. To conserve and enhance biodiversity and geodiversity.	+?
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	0
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	0
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	+?
15. To revitalise the Districts' town centres.	0
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	+?

### Option A: Policy LP35 – Developer Contributions and Planning Obligations

**7.344** The policy is expected to have a significant positive effect on SA Objective 4 (Housing), as developer contributions and planning obligations will help to secure the provision of affordable housing in relation to residential schemes.

**7.345** Most of the other SA Objectives are expected to have minor positive but uncertain effects as developer contributions, planning obligations, and the Community Infrastructure Levy (CIL) will help to finance infrastructure, as well provide new or enhanced infrastructure associated with development, as set out in the Infrastructure Delivery Plan (IDP) and Joint Local Plan. These effects are expected against SA Objective 1 (Health and Wellbeing), SA Objective 2 (Education and Skills),

SA Objective 3 (Accessibility), SA Objective 5 (Water), SA Objective 6 (Air and Noise), SA Objective 8 (Waste), SA Objective 9 (Climate Change Mitigation), SA Objective 10 (Climate Change Adaptation), SA Objective 11 (Biodiversity and Geodiversity), SA Objective 14 (Economic Growth) and SA Objective 16 (Sustainable Travel).

### Summary of SA scores for Part 2: Local Policies

**7.346 Table 7.19** below shows all the SA scores for the Part 2: Local Policies.

Table 7.19: Summary of SA scores for Part 2: Local Policies

Policy	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
Policy LP01 – Windfall development in hamlets and dwellings clusters	+	0	-	+/-	0	0	+	0	+/-	0	+	+	+	0	0	-
Policy LP02 – Residential Annexes	+	0	0	+	0	0	0	0	+	0	+	+	+	0	0	0
Policy LP03 – Residential Extensions and Conversions	+	0	0	+	0	0	0	0	0	0	+	+	+	0	0	0
Policy LP04 – Replacement Dwellings in the Countryside (Outside of Settlement Boundaries)	+	0	0	+	0	0	?	0	0	0	+	+	+	0	0	0
Policy LP05 – Replacement Dwellings and Additional Dwellings on Sub-Divided Plots Within Settlement Boundaries	+	0	+	+	0	0	0	0	0	0	+	+	+	0	0	0
Policy LP06 – Mix and type of composition	+	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0
Policy LP07 – Supported and Special Needs Housing	++	0	+	++	0	0	0	0	0	0	+	+	+	0	+	+
Policy LP08 – Affordable Housing	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0
Policy LP09 – Provision for Gypsy and Traveller and Travelling Showpeople	+	+	+	++	+	+	+	0	0	0	0	0	0	0	0	0
Policy LP10 – Moorings, Marinas and Houseboats	0	0	0	+	+	0	0	0	0	0	+	0	+	0	0	0
Policy LP11 – Self-Build and Custom-Build	+	0	0	+	0	0	0	0	+	0	+	+	+	0	0	0
Policy LP12 – Employment Development	+	+	0	0	0	+/-	?	0	+/-	0	+	+	+	++	0	+/-
Policy LP13 – Safeguarding Economic Opportunities	+	0	++	0	0	0	0	0	0	0	0	0	0	++	0	0
Policy LP14 – Town Centre and Retail	+	0	+	+	0	0	0	0	0	0	0	0	+	++/-	++	0

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Policy	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
Policy LP15 – Tourism	0	0	++	0	0	+/-	+	0	+/-	0	+/-	+/-	+/-	++	+	+/-
Policy LP16 – Countryside Tourist Accommodation	0	0	0	+/-	0	0	0	0	+	0	+	+	+	+/-	0	0
Policy LP17 – Environmental Protection	++	0	0	+/-	++	++	++	++	0	0	+/-	0	0	+/-	0	0
Policy LP18 – Biodiversity and Geodiversity	+	0	0	+/-	0	0	0	0	0	0	++	0	++	+/-	0	+
Policy LP19 – Landscape	0	0	0	+/-	0	0	0	0	0	0	+	+	++	+/-	0	0
Policy LP20 – Area of Outstanding Natural Beauty	0	0	-	+/-	0	+	0	0	0	0	+	+	++	+/-	0	0
Policy LP21 – The Historic Environment	0	0	0	+/-	0	0	0	0	0	0	0	++	+	+/-	0	0
Policy LP22 – Change in Land Use for Equestrian or Other Animal/Rural Land Base Uses	+	0	+	+	0	0	+	+	0	0	+	+	+	+/-	0	0
Policy LP23 – Agricultural Land to Residential Garden Land	0	0	+	0	0	0	+	0	0	0	+	0	+	0	0	0
Policy LP24 – New Agricultural/Rural Buildings in the Countryside	+	0	0	0	0	0	0	0	0	0	+	+	+	+/-	0	+/-
Policy LP25 – Sustainable Construction and Design	+	+	+	+/-	++	++	+	+	++	++	+	0	+	0	0	+
Policy LP26 – Design and Residential Amenity	++	0	+	+	0	+	0	+	0	+	++	+	+	0	0	++
Policy LP27 – Energy Sources, Storage and Distribution	+	+	0	0	+	+	0	0	++	0	+	+	+	++	0	0
Policy LP28 – Water Resources and Infrastructure	0	0	0	0	++	0	0	0	0	++	+	0	0	0	0	0
Policy LP29 – Flood Risk and Vulnerability	+	0	0	+	++	0	+	0	0	++	+	+	+	+	0	0

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Policy	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
Policy LP30 – Designated Open Spaces	++	0	+	0	+	+	+	0	+	+	+	+	+	0	0	+
Policy LP31 – Services and Facilities Within the Community	++	++	++	+	0	+	0	0	+	0	0	+	+	+	+	+
Policy LP32 – Safe, Sustainable and Active Transport	++	0	+	0	0	++/-	0	0	++/-	0	+	0	0	0	+	++
Policy LP33 – Managing Infrastructure Provision	++	++	++	+	++	0	0	++	+	++	0	0	0	+	+	+/-
Policy LP34 – Health and Education Provision	++	++	+	-	0	0	0	0	+	0	0	0	+	0	0	+
Policy LP35 – Developer Contributions and Planning Obligations	+	+	+	++	+	+	0	+	+	+	+	0	0	+	0	+

## Part 3: SA of place and allocations policies

**7.347** This section presents the findings of the SA of the Place and Allocations Policies (Part 3 of the JLP).

### Introduction

**7.348** Part 3 of the JLP contains 102 Place and Allocations policies and this section presents the findings of the SA of these policies. The Place and Allocations policies are made up of a number of preferred sites that BMSDC have allocated in the JLP.

### The appraisal process

**7.349** Policy LS01 is different to the other policies in Part 3 of the JLP and lists 90 allocated sites, located in Hinterland Villages and Hamlets. Therefore, Policy LS01 was appraised differently to the remaining Place and Allocations policies. It was appraised against each of the sixteen SA Objectives, using the average score all 90 sites listed received against these objectives.

**7.350** The remaining 101 Place and Allocation policies are for specific sites. The methodology for the appraisal of these allocations is described in **Chapter 2 (Methodology)** of this SA Report.

**7.351** These policies correspond to one of the reasonable alternative sites appraised in **Chapter 6 (Sustainability Appraisal of Reasonable Alternative Sites)**. However, a small number of the allocation policies combine more than one of these sites into a single policy:

- LA013 – Land north of the A1071, Sproughton: SS0191 (residential); SS0954 (residential); and SS1024 (residential).
- LA028 – Land north east of Frog Hall Lane, Hadleigh: SS0298 (residential); and SS1035 (employment).
- LA032 – Former Mid Suffolk District Council Offices and Car Park, Needham Market: SS0530 (residential); and SS1005 (residential).
- LA036 – Land south of Union Road, Stowmarket: SS0029 (residential); and SS0157 (residential).<sup>51</sup>
- LA055 – Land south-west of Rembrow Road, Capel St Mary: SS0637 (residential); and SS0910 (residential).

**7.352** Three of the 101 policies refer to both residential and employment uses:

- LA014 (Land at Poplar Lane, Sproughton)
- LA028 (Land north east of Frog Hall Lane, Hadleigh)
- LA055 (Land south-west of Rembrow Road, Capel St Mary).

**7.353** However, LA055 has been treated as a residential allocation only because the employment land proposed by this allocation policy equates to just under 2% of the entire site area. LA014 comprises a residential site (SS0299) and is therefore also treated as a residential allocation. However, employment site assessment criteria and assumptions have been applied against SA Objective 14 (To achieve sustainable levels of prosperity and economic growth throughout the plan area) for this site. LA028 comprises both a residential (SS0298) and an employment site (SS1035). Therefore, both sites have been treated as such throughout this chapter, with reference made to LA028 under both the residential and employment sections.

**7.354** Overall, there are 95 residential allocations, 5 employment allocations and 1 mixed-use allocation.

**7.355** The appraisal was undertaken on a 'policy-on' basis, which means that site-specific mitigation as set out in the Place and Allocations Policies has been taken into account. Reliance was not placed on the non-site specific policies found in Parts 1 and 2 of the JLP to provide sufficient mitigation. This is because the purpose of the Place and Allocations Policies is to provide mitigation specific to the issues relating to a particular site. In some instances, a judgement was made, on the basis of the evidence available, that it would not be possible to mitigate against significant negative effects, notwithstanding any policy safeguards in the allocation policy. Where this is the case, the reasons for this have been explained.

### Presentation of the findings of the SA of the Place and Allocations policies

**7.356** The appraisal of Policy LS01 (Hinterland and hamlet sites) is presented in a matrix against each of the sixteen SA Objectives, with a commentary underneath. This is the same approach used to appraise Part 1 and Part 2 of the JLP.

**7.357** The results of the remaining 101 Place and Allocation policies is firstly by residential and mixed-use allocations, followed by employment allocations.

<sup>51</sup> Sites SS0029 and SS0157 were both allocated in the Stowmarket Area Action Plan (2013).

**7.358** The SA findings are presented by SA Objective. The focus is on significant effects, as required by the SEA Regulations. Therefore, for each SA Objective, only the allocations that score significant positive effects or significant negative effects are referenced.

**7.359** A brief commentary of the findings is provided, plus consideration of mitigation measures as set out in the Place

and Allocations Policies. The detailed findings for each site are presented in **Appendix F (Detailed Appraisal of Place and Allocations Policies)**. In a small number of instances, the policy-on scores for these allocations have changed as a result of changes to the boundaries of the final site allocations. Where this is the case, it has been stated.

## Policy LS01

Table 7.20: Policy LS01

SA Objective	LS01
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	+
2. To maintain and improve levels of education and skills in the population overall.	--
3. To reduce poverty and social exclusion and ensure access to jobs and services.	-
4. To meet the housing requirements of the whole community.	++
5. To conserve and enhance water quality and resources.	-
6. To maintain and where possible improve air quality and reduce noise pollution.	--
7. To conserve soil and mineral resources.	-
8. To promote the sustainable management of waste.	N/A
9. To reduce contribution to climate change.	--
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	-
11. To conserve and enhance biodiversity and geodiversity.	-
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	-
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	-
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	0
15. To revitalise the Districts' town centres.	--
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	-

**7.360** Policy LS01 is expected to have a significant positive effect against SA Objective 4 (Housing) because the sites listed in this policy will all contribute to housing provision. Furthermore, around 85% of them fall within one of the 20% most deprived areas with regard to the 'Barriers to housing and services' domain of the English Indices of Deprivation and will therefore help regenerate these areas.

**7.361** A minor positive effect is expected against SA Objective 1 (Health and Wellbeing) because the sites are generally well located in relation to open space, sport and recreation facilities, in addition to Public Rights of Way. However, roughly

95% of them are located beyond the preferred maximum walking distance to a GP surgery.

**7.362** Significant negative effects are expected in relation to SA Objective 9 (Climate Change Mitigation), SA Objective 2 (Education and Skills), SA Objective 15 (Town Centres) and SA Objective 6 (Air and Noise). This is due to the fact almost all of the sites listed are located within or adjacent to a Hinterland or Hamlet Village and are therefore not located within close proximity to a good range of services and facilities (e.g. education) or town and district centres where employment opportunities are present. Therefore, people are

most likely to need to travel via private car to reach their workplace and other amenities. This is expected to have an adverse effect on air quality and noise pollution. Indeed, just over half of the sites listed are located within 12.5km of an AQMA and their development could exacerbate existing air quality issues.

**7.363** Policy LS01 is expected to result in minor negative effects against the remaining SA Objectives (with the exception of SA Objective 14: Economic Growth). Minor negative effects are expected against these objectives because the policy does not contain any site-specific mitigation. However, we note that mitigation is provided in the form of strategic and development management policies throughout the JLP. Policies that would help mitigate the adverse effects identified are as follows:

- SP09 – Enhancement and Management of the Environment
- SP10 – Climate Change
- LP10 – Environmental Protection
- LP18 – Biodiversity & Geodiversity
- LP19 – Landscape
- LP20 – Area of Outstanding Natural Beauty
- LP21 – The Historic Environment
- LP25 – Sustainable Construction and Design
- LP26 – Design and Residential Amenity
- LP28 – Water resources and infrastructure
- LP29 – Flood risk and vulnerability
- LP32 – Safe, Sustainable and Active Transport
- LP33 – Managing Infrastructure Provision

**7.364** It is unlikely that the significant negative effect against SA Objective 15 can be mitigated because none of the sites listed in Policy LS01 are located within a town or district centre. Likewise, it is also difficult to mitigate against SA Objective 7 (Soils and Minerals) as development could result in the permanent loss of best and most versatile agricultural land.

**7.365** Although a minor negative effect is expected in relation to SA Objective 12 (Historic Environment) overall, we note that development of just under one fifth of the sites listed could result in a significant adverse effect on the historic environment without mitigation. Likewise, although a minor negative effect is expected against SA Objective 13 (Landscape/Townscape), two of the sites listed have been identified as having moderate-high landscape sensitivity and

their development could therefore result in adverse effects on the landscape, without mitigation.

**7.366** A negligible effect is expected against SA Objective 14 (Economic Growth) because the sites listed are all residential sites. Therefore, SA Objective 14 is not relevant.

**7.367** Of the 90 sites listed, 36 already having planning consent. Therefore, mitigation for these sites is not possible or has already been dealt with through the development management process when the application was being considered for approval.

## Place and Allocations Policies

### SA Objective 1: To improve the health and wellbeing of the population overall and reduce health inequalities

#### Residential allocations

**7.368** Over two fifths of residential allocations (including residential site SS0298 in mixed-use allocation LA028) are expected to have a significant positive effect against SA Objective 1 (To improve the health and wellbeing of the population overall and reduce health inequalities) because they perform relatively strongly against criteria 1a (GP surgeries), 1b (Open space, sport and recreation) and 1c (Public Rights of Way), and are also expected to make contributions towards healthcare and open space provision, whilst also enhancing Public Rights of Way. Where this is the case, the policy-off effects against these three criteria have been upgraded by one (policy-on effects) to reflect this. Indeed, contributions will not result in the provision of new healthcare facilities, open spaces and Public Rights of Way but will instead improve existing ones.

**7.369** For some of the allocations that contain Public Rights of Way, the policy wording states that Public Rights of Way within these sites will be retained. In these instances, uncertainty is removed from the major positive effects already recorded against criterion 1c (Public Rights of Way). Currently, only a very small proportion of sites have uncertainty recorded against criterion 1c and subsequently against SA Objective 1.

**7.370** Where new footways are proposed as part of mitigation, the effects against criterion 1c have not been upgraded. This is because footways are different to Public Rights of Way and criterion 1c only relates to Public Rights of Way.

**7.371** There are two residential allocations where a replacement playing field is to be provided as part of the scheme: (1) LA028: Land north east of Frog Hall Lane, Hadleigh (residential site SS0298); and (2) LA076: Land south of The Street, Stonham Aspal (residential site SS0141). Due to the fact these playing fields are replacing existing playing fields that are likely to be lost, the effects against criterion 1b

(Open space, sport and recreation) for these sites have not been upgraded.

**7.372** None of the residential allocations (including mixed-use allocation LA028) are expected to have a significant negative effect against SA Objective 1.

#### Employment allocations

**7.373** SA Objective 1 (To improve the health and wellbeing of the population overall and reduce health inequalities) is not relevant to employment sites.

#### SA Objective 2: To maintain and improve levels of education and skills in the population overall

##### Residential allocations

**7.374** Just under one fifth of residential allocations (including residential site SS0298 in mixed-use allocation LA028) are expected to have a significant positive effect against SA Objective 2 (To maintain and improve levels of education and skills in the population overall) because they perform relatively strongly against criteria 2a (Primary schools) and 2b (Secondary schools). Some of these allocations are expected to provide a new primary school on-site and/or contribute towards education provision overall. Where a site is expected to provide a new primary school on-site, the policy-off effect against criterion 2a has been upgraded to a major positive effect (policy-on effect) to reflect this. Where a site is expected to make contributions towards education provision, the policy-off effects against criteria 2a and/or 2b have been upgraded by one (policy-on effects), depending on which level of education the contributions will be made towards. It should be noted that the SA assessment criteria rely on distance from the residential site to schools in order to generate an SA effects score. Financial contributions from developers can be used by local authorities to invest in school provision (e.g. by increasing school capacity), and it was decided to acknowledge this as mitigation, but unless a new school is being provided closer to the residential site, this will not make access to a school any closer. In some instances, the level of education is unknown and therefore uncertainty has been added.

**7.375** There are a number of residential allocations where a new pre-school is to be provided as part of development. These are: LA055: Land south-west of Rembrow Road, Capel St Mary (residential sites SS0637 and SS0910); LA042: Land at Tye Farm, Great Cornard (residential site SS0242); LA007: Land east of The Street, Bramford (residential site SS0478); LA065: Land north west of School Road, Elmswell (residential site SS0107); LA035: Ashes Farm, Stowmarket (residential site SS0264); and LA028: Land north east of Frog Hall Lane, Hadleigh (residential site SS0298). LA028 is a mixed-use

allocation, whilst LA055 will contain a very small proportion of employment land (less than 2% of the site overall). Due to the fact criterion 1a relates to primary schools and not pre-schools, the above has not been reflected in the policy-on appraisals.

**7.376** Criterion 2c (Further and higher education facilities) is not used in the significance scoring against this objective because criteria 2a and 2b are considered to be the main determinants in access to education.

**7.377** None of the residential allocations are expected to have a significant negative effect against SA Objective 2.

#### Employment allocations

**7.378** SA Objective 2 (To maintain and improve levels of education and skills in the population overall) is not relevant to employment sites.

#### SA Objective 3: To reduce poverty and social exclusion and ensure access to jobs and services

##### Residential allocations

**7.379** Under one fifth of residential allocations (including residential site SS0298 in mixed-use allocation LA028) are expected to have a significant positive effect against SA Objective 3 (To reduce poverty and social exclusion and ensure access to jobs and services) because they perform strongly against criteria 3a (IMD), 3b (Settlement hierarchy) and 3c (Centres of employment). These sites tend to fall within or close to deprived areas in the JLP area and therefore have potential to regenerate these areas. They are also located within or adjacent to settlements towards the top of the settlement hierarchy where accessibility to jobs and services is good. These settlements tend to be those that fall within the Ipswich Fringe or which are Market Towns. The sites are also located within desirable walking distance of strategic employment sites/enterprise zones and therefore provide residents with good accessibility to employment opportunities.

**7.380** One residential allocation is expected to have a significant negative effect against this objective: LA098: Land south of High Road, Leavenheath (residential site SS0587). This is because the allocation is located in an area at the bottom of the settlement hierarchy and is also beyond the preferred maximum walking distance to a strategic employment site/enterprise zone. Mitigation in relation to SA Objective 3 is difficult. LA098 is located in a hamlet and its proximity to a strategic employment site/enterprise zone will not change unless one is developed nearby.

### Employment allocations

**7.381** None of the employment allocations (including employment site SS1035 in mixed-use allocation LA028) are expected to have a significant positive or significant negative effect against SA Objective 3 (To reduce poverty and social exclusion and ensure access to jobs and services).

### SA Objective 4: To meet the housing requirements of the whole community

#### Residential allocations

**7.382** Over two fifths of residential allocations are expected to have a significant positive effect against SA Objective 4 (To meet the housing requirements of the whole community). This is because these sites perform relatively well against criteria 4a (Housing provision) and 4b (Barriers to housing and services). A large proportion of these sites are located within one of the 20% most deprived areas with regard to the 'Barriers to housing and services' domain and therefore have potential to directly address this issue through housing provision. A smaller proportion of these sites are expected to provide 250 or more dwellings. However, all sites will contribute to the delivery of housing so generally perform well against this objective.

**7.383** None of the residential allocations (including residential site SS0298 in mixed-use allocation LA028) are expected to have a significant negative effect against SA Objective 4.

#### Employment allocations

**7.384** SA Objective 4 (To meet the housing requirements of the whole community) is not relevant to employment sites.

### SA Objective 5: To conserve and enhance water quality and resources

#### Residential allocations

**7.385** None of the residential allocations (including residential site SS0298 in mixed-use allocation LA028) are expected to have a significant positive effect against SA Objective 5 (To conserve and enhance water quality and resources).

**7.386** Less than 5% of the residential allocations are expected to have a major negative effect against SA Objective 5 because they score a major negative effect against at least one of the four criteria, which relate to Source Protection Zones, water resources, waste water treatment capacity, and sewerage network capacity. These sites all scored a major negative effect against criterion 5a (Source Protection Zones) because they fall within Source Protection Zone 1.

**7.387** However, around 80% of residential allocations are expected to have a significant negative effect against this

objective. This is mainly due to the fact they are expected to result in three or more minor negative effects against the four criteria.

**7.388** Where the allocation policies state that a full assessment of increased discharge on the watercourse will be provided, including relevant mitigation measures, the policy-off effect against criterion 5a has been upgraded by one to reflect this (policy-on effect).

**7.389** Two of the allocation policies also state that a Construction Environmental Management Plan will be required to demonstrate that development protects groundwater, surface water features and controls aquatic pollution: (1) LA075: Land south of The Street, Shotley (residential site SS0208); and (2) LA052: Land north of Mill Road, Botesdale & Rickinghall (residential site SS0949). Only one of these three allocations fall within a Source Protection Zone (LA052). Therefore, the effect against criterion 5a (Source Protection Zones) for residential site SS0949 was upgraded by one to reflect this.

**7.390** It should be noted that the Water Cycle Study found that these issues should be resolvable, and Policy LP28 (Water Resources and Infrastructure) provides safeguards in this respect.

#### Employment allocations

**7.391** Two thirds of the employment allocations are expected to have a significant negative effect against SA Objective 5 (To conserve and enhance water quality and resources). This is because all four allocations are expected to result in three or more minor negative effects against the four criteria under SA Objective 5.

**7.392** It should be noted that the Water Cycle Study found that these issues should be resolvable, and Policy LP28 (Water Resources and Infrastructure) provides safeguards in this respect.

### SA Objective 6: To maintain and where possible improve air quality and reduce noise pollution

#### Residential allocations

**7.393** None of the residential allocations (including residential site SS0298 in mixed-use allocation LA028) are expected to have a significant positive effect against SA Objective 6 (To maintain and where possible improve air quality and reduce noise pollution).

**7.394** Just under three quarters of the residential allocations (including residential site SS0298 in mixed-use allocation LA028) are expected to have a significant negative effect against SA Objective 6 because they perform poorly against criterion 6a (AQMA), followed by 6b (Noise) and 6c (Odour).

Indeed, most sites fall within 12.5km of an AQMA and were therefore given a major negative effect against criterion 6a. Although some of the Place and Allocations policies refer to the need for the inclusion of bus stops, or cycleways, or transport assessments, it was not considered that these are likely to have a material effect on mitigating air pollution in the AQMAs. Despite this, harmful vehicle emissions are being reduced on an ongoing basis and electric cars which help reduce air pollution will be more commonplace by the end of the Plan period.

**7.395** Some of the allocation policies contain wording on mitigating noise pollution for those sites affected. Where this is the case, the policy-off effect against criterion 4b has been upgraded by one to reflect this (policy-on effect). However, where a policy makes reference to mitigating noise pollution generated as a result of a quarry, the effect has not been upgraded. This is because criterion 4b relates to noise generated as a result of road and rail, not quarries, and therefore was not recorded in the 'policy-off' appraisal. There is only one allocation which this applies to: LA001 Land east of Norwich Road, Barham (residential site SS0551).

**7.396** Where odour generated by waste management facilities has been identified as having a major negative effect on a site, mitigation has not been proposed.

### Employment allocations

**7.397** None of the employment allocations (including employment site SS1035 in mixed-use allocation LA028) are expected to have a significant positive effect against SA Objective 6 (To maintain and where possible improve air quality and reduce noise pollution).

**7.398** Two thirds of the employment allocations (including employment site SS1035 in mixed-use allocation LA028) are expected to have a significant negative effect against SA Objective 6 because they perform poorly against criterion 6a (AQMA), followed by 6c (Odour). These allocations fall within 12.5km or 25km of an AQMA, and a small proportion fall within 400m of a Safeguard Area of a water recycling centre.

### SA Objective 7: To conserve soil and mineral resources

#### Residential allocations

**7.399** Around 10% of residential allocations are expected to have a significant positive effect against SA Objective 7 (To conserve soil and mineral resources) because they score a major positive effect against criterion 7a (Brownfield/greenfield land). These sites all comprise brownfield land and will therefore make efficient use of previously developed land.

**7.400** Just under one third of the residential allocations are expected to have a significant negative effect against this

objective. This is because their development will take place on the Best and Most Versatile Agricultural Land and some of them are located within 250m of an existing, planned or potential site allocated in the Suffolk Minerals and Waste Local Plan for sand and gravel.

**7.401** It is not possible to mitigate the loss of Best and Most Versatile Agricultural Land. However, a number of the allocation policies state that the developer should test the potential resources on the site to identify if use of the minerals on site is appropriate. Where this is the case, the policy-off effect against criterion 7c (Minerals) has been upgraded by one to reflect this (policy-on effect). However, the effect is recorded as uncertain because it is unknown whether use of the minerals on site will be suitable. Two of the residential allocations which are expected to have a significant negative effect against SA Objective 7 overall, have uncertainty recorded against them as a result of this: LA002: Land north of Church Lane, Barham (residential site SS0076); and LA035: Ashes Farm, Stowmarket (residential site SS0264).

**7.402** Additionally, a small number of policies state that measures will be introduced to remediate land affected by contamination and address land stability. Due to the fact SA Objective 7 does not contain a criterion on land contamination, the above has not been reflected in the following policy-on appraisals: LA114: Land north of Red Hill Road/Maylon Road, Hadleigh (residential site SS0584); LA069: Land north west of Melford Road, Lavenham (residential site SS0288); LA001: Land east of Norwich Road, Barham (residential site SS0551); and LA099: Land at Eye Airfield, Eye (employment site SS0928).

#### Employment allocations

**7.403** One employment allocation, LA018: Land at Former Sugar Beet Factory Site, Sproughton (employment site SS0721), is expected to have a significant positive effect against SA Objective 7 (To conserve soil and mineral resources) because it comprises brownfield land. Therefore, it makes efficient use of previously developed land.

**7.404** Two of the employment allocations, LA108: Land south of Gun Cotton Way, Stowmarket (employment site SS1032) and LA120: Lawn Farm, Woolpit (employment site SS0773), are expected to have a significant negative effect against SA Objective 7 because they both comprise greenfield land. Therefore, development will not make efficient use of previously developed land. Additionally, a significant proportion of LA108 also falls on Grade 1 or 2 agricultural land, whilst LA120 is located within 250m of an existing, planned or potential site allocated in the Suffolk Minerals and Waste Local Plan for sand and gravel extraction. As mentioned previously, where a policy states that a developer should test the potential resources on site, policy-off effects

against criterion 7c (Minerals) have been upgraded by one to reflect this (policy-on effects), with uncertainty added.

### SA Objective 8: To promote the sustainable management of waste

**7.405** No significance score is recorded against SA Objective 8 (To promote the sustainable management of waste) because the location of residential and employment sites is unlikely to have an effect on waste generation and management. We note, however, that a small number of allocation policies state that contributions will be made towards waste recycling provision.

### SA Objective 9: To reduce contribution to climate change

#### Residential allocations

**7.406** Around two fifths of residential allocations are expected to have a significant positive effect against SA Objective 9 (To reduce contribution to climate change). This is because these sites perform strongly against related SA criteria: 1a (GP surgeries); 1b (Open space, sport and recreation); 1c (Public Rights of Way); 2a (Primary schools); 2b (Secondary schools); 2c (Further and higher education facilities); 3b (Settlement hierarchy); 3c (Centres of employment); 16a (Rail) 16b (Bus) and 16c (Cycling). Therefore, they are within easy walking distance of education and healthcare facilities at settlements towards the top of the settlement hierarchy, in addition to public transport modes.

**7.407** One residential allocation, LA098: Land south of High Road, Leavenheath (residential site SS0587), is expected to have a significant negative effect against this objective because it performs poorly against the above mentioned criteria.

**7.408** Mitigation of greenhouse gas emissions from vehicles is dealt through alternatives to the car, which are commented upon in the summary of the appraisals of the SA Objective 1 (Health and Wellbeing), SA Objective 2 (Education and Skills), SA Objective 3 (Accessibility) and SA Objective 16 (Sustainable Travel).

#### Employment allocations

**7.409** Half of the employment allocations are expected to have a significant positive effect against SA Objective 9 (To reduce contribution to climate change) because they perform strongly against related SA criteria: 3b (Settlement hierarchy); 16a (Rail); 16b (Bus); and 16c (Cycling). Therefore, they are located within or adjacent to settlements towards the top of the settlement hierarchy, in addition to public transport modes.

**7.410** None of the employment allocations (including employment site SS1035 in mixed-use allocation LA028) are

expected to have a significant negative effect against SA Objective 9.

### SA Objective 10: To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change

#### Residential allocations

**7.411** None of the residential allocations (including residential site SS0298 in mixed-use allocation LA028) are expected to have a significant positive effect against SA Objective 10 (To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change).

**7.412** Around 15% of the residential allocations are expected to have a significant negative effect against SA Objective 10. All of these sites contain land with a 1 in 30 year risk of surface water flooding. One of the residential allocations, LA047: Land north east of Turkey Hall Lane, Bacton (residential site SS099), also contains 25% or more of land within Flood Zone 3. No mitigation has been proposed in the site-specific policies for these sites, which score a significant negative policy-on effect. This may partly be due to the fact that around half of these allocations were not identified in the Strategic Flood Risk Assessment (SFRA) as being at risk of flooding.

**7.413** The SA uses national datasets as a basis for assessment and has taken a more precautionary approach with regard to flood risk. For example, in the SA a site is given a major negative effect if 25% or more of it falls within Flood Zone 3 and a minor negative effect if 25% or more of it falls within Flood Zone 2. This is slightly different for employment sites in that if 25% or more of an employment site falls within Flood Zone 3, a major negative effect is given and if between 10% and 25% of an employment site falls within Flood Zone 3, a minor negative effect is given. In comparison, the SFRA lists sites where 10% or more of their area falls within Flood Zone 3 and/or Flood Zone 2. With regard to surface water flooding, the SA gives a major negative effect if a site contains land with a 1 in 30 year risk of surface water flooding, and a minor negative effect if a site contains land with a 1 in 100 year risk of surface water flooding. The SFRA lists sites where 10% or more of their area contains land with a 1 in 100 year risk of surface water flooding.

**7.414** The Strategic Flood Risk Assessment (SFRA) highlights any sites in the JLP area that are at risk of the following types of flooding: fluvial, tidal, surface water, groundwater, sewers and reservoir inundation. According to the SFRA, the most significant sources of flooding are fluvial and surface water.

**7.415** The residential allocations identified in the SFRA as being at risk of fluvial flooding are: LA112: Land east and west

of Prentice Road, Stowmarket (residential site SS1288); LA027: Former Babergh District Council Offices, Hadleigh (residential site SS0537); LA056: Land south of Low Road (residential site SS0902); LA073: Land south of Glebe Way, Mendlesham (residential site SS0065); LA016: Land West of Bourne Hill, Wherstead (residential site SS1020); LA118: Land west of Church Road, Thurston (residential site SS0765); LA035: Ashes Farm, Stowmarket (residential site SS0264); and LA116: Land east of Loraine Way, Sproughton (residential site SS0711). Out of these eight allocations, five received a significant negative effect against SA Objective 10. However, this was due to the fact these sites with the exception of one, are at risk of surface water flooding according to national data, not fluvial flooding.

**7.416** The SFRA identified the following residential allocations as being at risk of surface water flooding: LA119: Land north of Pesthouse Lane, Barham (residential site SS1056); LA038: Land south of Creeping Road West, Stowmarket (residential site SS0668); LA027: Former Babergh District Council Offices, Hadleigh (residential site SS0537); LA115: Angel Court, Angel Street, Hadleigh (residential site SS0502); LA056: Land south of Low Road (residential site SS0902); LA081: Land north of Laxfield Road, Stradbroke (residential site SS1198); LA003: Land south of Church Lane, Claydon (residential site SS0861); LA063: Land south of Church Road, Elmswell (residential site SS0096); and LA007: Land east of The Street, Bramford (residential site SS0478). Out of these nine allocations, six received a significant negative effect against SA Objective 10 because they contain land with a 1 in 30 year risk of surface water flooding. In comparison, the SFRA identified sites which contain land with a 1 in 100 year risk of surface water flooding.

**7.417** With regard to tidal flooding, the SFRA identified one residential allocation as being at risk of tidal flooding: LA016: Land West of Bourne Hill, Wherstead (residential site SS1020). This site did not receive a significant negative effect against SA Objective 10.

**7.418** The SFRA identified the following sites as being at risk of groundwater flooding: LA119: Land north of Pesthouse Lane, Barham (residential site SS1056); LA056: Land south of Low Road (residential site SS0902); and LA040: Land west of Bures Road, Great Cornard (residential site SS0433). In the SFRA, sewer and reservoir inundation data were not provided in a format to screen against the sites.

**7.419** In the JLP, there are a small number of residential allocations where the policy states that flood risk assessments will be required, in addition to an assessment of increased discharge on the watercourse. Where this is the case, the policy-off effects against criteria 10a (Flood Zones) and 10b (Surface water flooding) have been upgraded by one to reflect this (policy-on effects). However, no effects are upgraded

beyond a negligible effect because it is unlikely the amount of growth proposed by the JLP will reduce flood risk.

### Employment allocations

**7.420** None of the employment allocations (including employment site SS1035 in mixed-use allocation LA028) are expected to have a significant positive effect against SA Objective 10 (To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change).

**7.421** LA099: Land at Eye Airfield (employment site SS0928) is expected to have a significant negative effect against SA Objective 10 because it contains land with a 1 in 30 year risk of surface water flooding. No mitigation has been proposed for this site.

**7.422** As mentioned previously, the SFRA lists any sites in the JLP area that are at risk of flooding. It identified one residential allocation as being at risk of fluvial flooding: LA044 - Allocation: Land at Mill Lane, Stowmarket (employment site SS1223). This site did not receive a significant negative effect against SA Objective 10 because although between 10% and 25% of the site area falls within Flood Zone 3 and the site contains land with a 1 in 30 year risk of surface water flooding, mitigation against flood risk is contained within the policy wording.

**7.423** The SFRA does not identify any employment allocations as being at risk of surface water flooding, tidal flooding, sewerage and reservoir inundation. The SA identified employment allocation LA099 (employment site SS0928) as containing land with a 1 in 30 year risk of surface water flooding, whereas the SFRA looks and land with a 1 in 100 year risk of surface water flooding.

### SA Objective 11: To conserve and enhance biodiversity and geodiversity

#### Residential allocations

**7.424** None of the residential allocations (including residential site SS0298 in mixed-use allocation LA028) are expected to have a significant positive effect against SA Objective 11 (To conserve and enhance biodiversity and geodiversity).

**7.425** Just under half of residential allocations (including residential site SS0298 in mixed-use allocation LA028) are expected to have a significant negative but uncertain effect against SA Objective 11. This is because 25% or more of the land within these sites falls within the 'All consultations' and/or 'Residential' SSSI Impact Risk Zone for the proposed dwelling capacity, and/or the sites are located within 250m of a Local Nature Reserve and/or County Wildlife Site, and/or 100m of a priority habitat and/or ancient woodland.

**7.426** For a number of these allocations, the policy wording states that an ecological survey and any necessary mitigation measures will be provided. Where this is the case, the policy-off effects against criteria 11a (Internationally and nationally designated biodiversity assets) and 11b (Locally designated biodiversity assets, priority habitats and ancient woodland) have been upgraded by one to reflect this (policy-on effects). However, a significant negative although uncertain effect is still expected overall due to the presence of two minor negative effects.

**7.427** It should be noted that there are other policies in the JLP, most notably Policy LP18 (Biodiversity and Geodiversity), that can be used by BMSDC to ensure that the negative effects on biodiversity of developing the site allocations are mitigated wherever possible, and that opportunities to incorporate biodiversity gain are utilised.

**7.428** A number of other allocations that did not receive a significant negative effect also contained this policy wording and had their scores upgraded by one against criteria 11a and 11b. However, no effects were upgraded beyond a negligible effect because it is unlikely the amount of growth proposed by the JLP will have beneficial effects on biodiversity and geodiversity.

#### Employment allocations

**7.429** None of the employment allocations (including employment site SS1035 in mixed-use allocation LA028) are expected to have a significant positive effect against SA Objective 11 (To conserve and enhance biodiversity and geodiversity).

**7.430** All six employment allocations (including employment site SS1035 in mixed-use allocation LA028) are expected to have a significant negative but uncertain effect against SA Objective 11. This is because 25% or more of the land within these sites fall within the 'Air pollution' SSSI Impact Risk Zone and/or the 'All consultations' and/or 'Water supply' SSSI Impact Risk Zone. Additionally, these sites are also located within 250m of a Local Nature Reserve and/or County Wildlife Site, and/or 100m of a priority habitat and/or ancient woodland.

**7.431** However, policies LA028 (employment site SS1035), LA099 (employment site SS0928) and LA044 (employment site SS1223) state that an ecological survey and any relevant mitigation measures will be provided. Therefore, the major negative effects against criteria 11a (Internationally and nationally designated biodiversity assets) and 11b (Locally designated biodiversity assets, priority habitats and ancient woodland) were upgraded to minor negative effects to reflect this. However, significant negative but uncertain effects are still expected overall because two minor negative effects equate to a significant negative effect overall against this

objective. Policies LA018 (employment site SS0721), LA108 (employment site SS1032) and LA120 (employment site SS0773) do not contain any mitigation against this objective

**7.432** It should be noted that there are other policies in the JLP, most notably Policy LP18 (Biodiversity and Geodiversity), that can be used by BMSDC to ensure that the negative effects on biodiversity of developing the site allocations are mitigated wherever possible, and that opportunities to incorporate biodiversity gain are utilised.

#### SA Objective 12: To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings

##### Residential allocations

**7.433** None of the residential allocations (including residential site SS0298 in mixed-use allocation LA028) are expected to have a significant positive effect against SA Objective 12 (To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings).

**7.434** Around 10% of residential allocations are expected to have a significant negative effect against SA Objective 12 because the significance of their known heritage assets (designated or otherwise) and historic landscape character are considered high and development is therefore likely to have an adverse physical impact on these assets. These sites are also likely to be very sensitive to change. Almost all of these residential allocations do not contain any mitigation in the policy wording and for those which do, the mitigation does not go far enough to limit any adverse effects development might have on the historic environment.

**7.435** Where detailed mitigation has been provided in policy wording, effects against criterion 12a (Nationally and locally designated and non-designated heritage assets) have been upgraded by one to reflect this.

##### Employment allocations

**7.436** None of the employment allocations (including employment site SS1035 in mixed-use allocation LA028) are expected to have a significant positive or significant negative effect against SA Objective 12 (To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings).

#### SA Objective 13: To conserve and enhance the quality and local distinctiveness of landscapes and townscapes

##### Residential allocations

**7.437** None of the residential allocations (including residential site SS0298 in mixed-use allocation LA028) are expected to

have a significant positive effect against SA Objective 13 (To conserve and enhance the quality and local distinctiveness of landscapes and townscapes).

**7.438** Around 10% of residential allocations are expected to have a significant negative effect against SA Objective 13 because they are considered to have high or moderate-high sensitivity. However, even with mitigation measures, it is unlikely that development will conserve and enhance the landscape within and around these sites.

#### Employment allocations

**7.439** None of the employment allocations (including employment site SS1035 in mixed-use allocation LA028) are expected to have a significant positive effect against SA Objective 12 (To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings).

**7.440** Employment allocation LA120: Lawn Farm (employment site SS0773) is expected to have a significant negative effect against SA Objective 12, in addition to employment site SS1035 in mixed-use allocation LA028. This is because both sites are considered to have high or moderate-high sensitivity. As mentioned previously, even with mitigation measures, it is unlikely that development will conserve and enhance the landscape within and around these sites.

#### SA Objective 14: To achieve sustainable levels of prosperity and economic growth throughout the plan area

##### Residential allocations

**7.441** One of two sites that form mixed-use allocation LA028: Land north east of Frog Hall Lane, is expected to have a significant positive effect against SA Objective 14 (To achieve sustainable levels of prosperity and economic growth throughout the plan area): residential site SS0298. Alongside employment site SS1035 which also forms part of this mixed-use allocation, both sites provide 5.5ha of employment land. Therefore, both sites will help contribute towards employment opportunities, with beneficial effects on economic growth throughout the plan area.

**7.442** Only three residential allocations are expected to have a significant negative effect against SA Objective 14: LA027: Former Babergh District Council Offices, Hadleigh (residential site SS0537); LA020: Land north of Magdalen Street, Eye (residential site SS1118); and LA032: Former Mid Suffolk District Council Offices and Car Park, Needham Market (residential site SS0530). These sites are expected to have a significant negative effect because they will all result in a loss of 50% or more of an existing employment area.

**7.443** Mitigation against this issue is not possible unless employment uses are incorporated into the site development, which is not mentioned in the policies.

##### Employment allocations

**7.444** All employment allocations (including employment site SS1035 in mixed-use allocation LA028), with the exception of LA108: Land south of Gun Cotton Way (employment site SS1032), are expected to have a significant positive effect against SA Objective 14 because they are over 5ha in size and will therefore contribute significantly to employment opportunities in the plan area.

**7.445** None of the employment allocations (including employment site SS1035 in mixed-use allocation LA028) are expected to have a significant negative effect against this objective.

#### SA Objective 15: To revitalise the Districts' town centres

##### Residential allocations

**7.446** Around one tenth of the residential allocations are expected to have a significant positive effect against SA Objective 15 (To revitalise the Districts' town centres) because they are located within 400m of a town centre and/or 200m of a district centre. Therefore, development is expected to increase footfall in nearby town and district centres.

**7.447** Around 80% of residential allocations are expected to have a significant negative effect against this objective because they are located beyond the preferred maximum walking distance to town and district centres. Therefore, they are not going to help revitalise town and district centres. No mitigation has been identified for these sites, although it should be noted that a significant number of the residential allocations, including some of the largest allocations in the JLP, are on the edge of the Market Towns. Although generally beyond walking distance from the town centres, they should nonetheless provide additional demand from the new residents for the shops, services and facilities provided by the town centres.

##### Employment allocations

**7.448** None of the employment allocations (including employment site SS1035 in mixed-use allocation LA028) are expected to have a significant positive effect against this objective.

**7.449** Two thirds of the employment allocations are expected to have a significant negative effect against SA Objective 15 because they are located beyond the preferred maximum walking distance to town and/or district centres. No mitigation has been identified for these sites, although it should be noted

that some of the employment allocations are on the edge of the Market Towns, and will therefore help to support the broader jobs and services offer of these settlements.

### SA Objective 16: To enable efficient patterns of movement and modal shift towards sustainable modes of transport

#### Residential allocations

**7.450** Around 15% of residential allocations are expected to have a significant positive effect against SA Objective 16 (To enable efficient patterns of movement and modal shift towards sustainable modes of transport) because they are located within desirable walking distance of railway stations, bus stops and/or cycle ways. Four residential allocations are located within desirable walking distance of all three modes of sustainable transport: LA035: Ashes Farm, Stowmarket (residential site SS0264); LA086: Land south of Heath Road, Thurston (residential site SS0319); LA038: Land south of Creeting Road West, Stowmarket (residential site SS0668); and LA112: Land east and west of Prentice Road, Stowmarket (residential site SS1288). The remaining sites are all located within desirable walking distance of a bus stop and a railway station or cycle way.

**7.451** One of the residential allocations, LA092: Land east of Wattisfield Road (residential site SS0369), is expected to have a significant negative effect against SA Objective 16 because it is located beyond the preferred maximum walking distance to a railway station and cycle way and is only located within the preferred maximum walking distance of a bus stop. Therefore, it does not have easy access to any sustainable transport modes. However, there is not a lot that can be done in terms of mitigation due to the size of the site. LA092 is one of the smallest sites in the JLP and mitigation against SA Objective 16 is only realistically viable in larger sites.

**7.452** A number of policies include measures to improve roads and junctions, in addition to requiring a transport assessment to determine existing and projected highways capacity and any mitigation required. However, due to the fact that SA Objective 16 relates to sustainable modes of transport and not the private car, measures such as these have not been reflected as mitigation in the policy-on effects. Where a policy includes measures to encourage use of sustainable modes of transport though, such as improvements to bus stops and cycle ways, the effects against criteria 16b (Bus) and/or 16c (Cycling) have been upgraded by one to reflect this mitigation.

#### Employment allocations

**7.453** LA108: Land south of Gun Cotton Way (employment site SS1032) is expected to have a significant positive effect against SA Objective 16 because it is located within desirable walking distance of a bus stop and cycle way.

**7.454** None of the employment allocations (including employment site SS1035 in mixed-use allocation LA028) are expected to have a significant negative effect against this objective.

### Summary of SA scores for Part 3: Place and allocation policies

**7.455** Table 7.21 below shows all the SA scores for the Part 3: Place and Allocation Policies. Sites shown in *italics* are committed. As of October 2020, these sites all had planning permission.

Table 7.21: Summary of SA scores for Part 3: Place and allocations policies

Allocation Policy	Size	Dwellings	Site ref.	Purpose	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
Babergh District																				
LA045: Land South of Tamage Road, Acton	3.5ha	100	SS0177	Residential	+	+	+	+	-	--	--	N/A	+	0	0?	-?	-	0	--	-
LA005: 6 Acre Field, Belstead	1.1ha	14	SS0591	Residential	+	--	+	++	-	--	--	N/A	-	0	--?	-?	-	0	--	+
LA048: Land south of Wattisham Road, Bildeston	3ha	75	SS0278	Residential	++	0	-	++	-	-	-	N/A	-	0	0?	-?	-	0	--	-
LA053: Land south of Ipswich Road, Brantham	8.4ha	125	SS0185	Residential	+	+	-	++	-	--	-	N/A	-	0	--?	-?	-	0	--	-
LA054: Land East of Longfield Road, Chapel St Mary	5.56ha	100	SS0251	Residential	+++?	-	-	+	-	--	--	N/A	-	0	--?	-?	-	0	--	-
LA055: Land south-west of Rembrow Road, Chapel St Mary <sup>52</sup>	26ha	550	SS0637	Residential	++	+	-	+	-	--	-	N/A	+	0	-?	-?	-	0	--	-
			SS0910	Residential	++	+	-	+	-	--	--	N/A	+	-	--?	-?	-	0	--	-
LA041: Land north-west of Waldingfield Road, Chilton	5.98ha	130	SS1121	Residential	+	0?	++	+	--	--	-	N/A	++	-	--?	--?	-	0	--	+
LA008: Land south east of Back Lane, Copdock & Washbrook	13ha	226	SS0295	Residential	+	+	+	++	--	--	-?	N/A	++	0	--?	-?	--	0	--	+

<sup>52</sup> This is a mixed-use allocation. However, it comprises two residential sites. The allocation is 26ha in size and employment accounts for 0.5ha of this. This is such a small proportion of the site that consideration has not been given to the employment site assessment criteria and assumptions.

Allocation Policy	Size	Dwellings	Site ref.	Purpose	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
LA009: Land south west of London Road, Copdock & Washbrook	0.8ha	12	SS0593	Residential	+	-	0	++	--	--	--	N/A	-	0	-?	-?	0	0	--	-
LA059: Land west of Hadleigh Road, East Bergholt	0.85ha	10	SS1197	Residential	-	+	-	+	--	--	-	N/A	-	0	--?	-?	-	0	--	-
LA060: Land north west of Moores Lane, East Bergholt	9ha	144	SS0181	Residential	+	++?	-	++	--	--	-?	N/A	+	0	--?	-?	-	0	--	-
LA061: Land south of Heath Road, East Bergholt	9ha	75	SS0182	Residential	++	+?	-	++	--	--	-?	N/A	+	0	--?	-?	-	0	--	-
LA039: Land east of Kings Hill, Great Cornard	0.74ha	8	SS1082	Residential	+	+	++	+	--	--	-	N/A	++	--	--?	-?	0	0	-	++
LA040: Land west of Bures Road, Great Cornard	1.64ha	46	SS0433	Residential	+	++	+	++	-	--	-	N/A	++	0	--?	0?	-	0	--	+
LA042: Land at Tye Farm, Great Cornard	60ha	500	SS0242	Residential	+	++	++	++	--	--	-?	N/A	++	0	-?	-?	--	0	--	+
LA027: Former Babergh District Council Offices, Hadleigh	0.69ha	50	SS0537	Residential	++	+	+	+	--	-	++	N/A	++	-	--?	-?	0	--	++	+
LA028: Land north east of Frog Hall Lane, Hadleigh <sup>53</sup>	25ha	600	SS0298	Residential	++	++	++	+	--	--	-	N/A	++	-	--?	-?	--	0	-	0?
			SS1035	Employment	N/A	N/A	+	N/A	--	--	-	N/A	+	0	--?	-?	--	++	-	0?
LA115: Angel Court, Angel Street, Hadleigh	0.3ha	21	SS0502	Residential	++	+	+	+	--	-	++	N/A	++	--	-?	0	0	0	++	+

<sup>53</sup> This is a mixed-use allocation.

Allocation Policy	Size	Dwellings	Site ref.	Purpose	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
LA114: Land north of Red Hill Road / Malyon Road, Hadleigh	3.2ha	75	SS0584	Residential	+?	+	++	+	-	--	-	N/A	+	-	--?	-?	-	0	--	-
LA068: Land east of Ipswich Road, Holbrook	0.3ha	7	SS0717	Residential	++	++	-	+	--	--	--	N/A	+	0	--?	-?	-	0	--	-
LA069: Land north west of Melford Road, Lavenham	0.57ha	20	SS0288	Residential	+	-	-	+	--	--	-	N/A	+	0	0?	-?	-	0	--	+
LA098: Land south of High Road, Leavenheath	5.29ha	40	SS0587	Residential	+	--	--	++	-	--	--	N/A	--	0	0?	-?	-	0	--	-
LA113: Land east of the B1064, Long Melford	8.5ha	150	SS0812	Residential	++	-	0	+	--	--	--	N/A	+	0	--?	-?	--	0	--	-
LA075: Land south of The Street, Shotley	2.96ha	50	SS0208	Residential	++	+	0	++	-	--	--	N/A	+	0	-?	-?	-	0	--	-
LA012: Land north of Burstall Lane and west of B1113, Sproughton	10.6ha	105	SS0223	Residential	+	+	+	++	-	--	-	N/A	++	--	--?	-?	-	0	--	+
LA013: Land north of the A1071, Sproughton	47.6ha	800	SS0191	Residential	++	+	++	++	--	--	--	N/A	++	0	--?	-?	-	0	--	+
			SS0954	Residential	+	+	+	++	-	--	--	N/A	++	0	0?	-?	-	0	--	+
			SS1024	Residential	++	+	++	++	--	--	--	N/A	++	-	--?	-?	-	0	--	+
LA014: Land at Poplar Lane, Sproughton <sup>54</sup>	12ha	475 <sup>55</sup>	SS0299	Residential	+++?	+?	++	++	--	--	--	N/A	++	0	--?	--?	0	+	--	+

<sup>54</sup> This is a mixed-use allocation. However, it comprises one residential site. Therefore, the employment site assessment criteria and assumptions have been applied to SA14.

<sup>55</sup> Includes 4ha employment land.

Allocation Policy	Size	Dwellings	Site ref.	Purpose	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
LA018: Land at Former Sugar Beet Factory Site, Sroughton	50ha	N/A	SS0721	Employment	N/A	N/A	+	N/A	--	--	++	N/A	++	-	--?	-?	0	++	--	+
LA116: Land east of Loraine Way, Sroughton	3.4ha	50	SS0711	Residential	+	+	+	++	-	--	-	N/A	++	0	--?	-?	-	0	--	+
LA016: Land West of Bourne Hill, Wherstead	8.25ha	75	SS1020	Residential	+++?	-	++	++	--	--	--	N/A	++	-	--?	-?	-	0	--	++
Mid Suffolk District																				
LA046: Former Bacton Middle School, Bacton	4.43ha	50	SS0088	Residential	++	++?	-	++	--	-	-	N/A	+	0	0	-?	+	0	--	-
LA047: Land north east of Turkey Hall Lane, Bacton	4.54ha	51	SS0099	Residential	+	-	-	+	--	--	-	N/A	-	--	-?	-?	-	0	--	-
LA106: Land south of Pretyma Avenue, Bacton	5.37ha	85	SS0518	Residential	+++?	++?	-	+	--	-	-	N/A	+	0	-?	-?	-	0	--	-
LA105: Land north of Church Road, Bacton	4.7ha	81	SS0266	Residential	++	++?	-	++	--	-	-	N/A	+	0	0	--?	+	0	--	-
LA119: Land north of Pesthouse Lane, Barham	1.7ha	20	SS1056	Residential	++?	-?	+	++	--	--	++	N/A	+	--	--?	0?	0	0	--	+
LA049: Land south of Back Hills, Botesdale & Rickinghall	3ha	40	SS0129	Residential	++	0	-	++	--	--	-	N/A	+	-	--?	--	-	0	--	-
LA050: Land north of Gardenhouse Lane, Botesdale & Rickinghall	1.5ha	42	SS1190	Residential	+	++?	-	+	--	-	-	N/A	+	0	0	-?	-	0	--	-

Allocation Policy	Size	Dwellings	Site ref.	Purpose	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
LA052: Land north of Mill Road, Botesdale & Rickinghall	2.8ha	69	SS0949	Residential	++	0	-	++	-	--	-	N/A	+	--	--?	-?	-	0	--	-
LA006: Land south of Fitzgerald Road, Bramford	4.18ha	100	SS0121	Residential	+	+	+	+	--	--	--	N/A	++	0	-?	-?	-	0	--	+
LA007: Land east of The Street, Bramford	9.3ha	190	SS0478	Residential	+	--	+	+	--	--	--	N/A	+	--	--?	-?	-	0	--	+
LA107: Land east of Bramford Road, Bramford	2.1ha	14	SS0636	Residential	+	+	++	+	--	--	-	N/A	++	0	-	-?	0	--	--	+
LA001: Land east of Norwich Road, Barham	10.6ha	325	SS0551	Residential	++	0	+	++	--	--	--	N/A	++	0	-?	-?	--	0	--	+
LA002: Land north of Church Lane, Barham	24.9ha	270	SS0076	Residential	++	++	+	++	--	--	--?	N/A	++	0	--?	-?	--	0	--	+
LA003: Land south of Church Lane, Claydon	6.2ha	75	SS0861	Residential	++	++	+	++	--	--	-	N/A	++	-	--?	-?	-	0	--	-
LA056: Land south of Low Road, Debenham	1ha	18	SS0902	Residential	++	0	-	+	--	-	-	N/A	+	--	--?	-?	-	0	++	+
LA057: Land north of Ipswich Road, Debenham	4ha	140	SS0031	Residential	++	0	-	+	--	-	-	N/A	+	-	--?	-?	-	0	++	+
LA058: Land east of Aspsall Road, Debenham	2.5ha	87	SS0268	Residential	++	++	-	+	--	-	-	N/A	+	0	--?	-?	-	0	++	+
LA062: Land east of Ashfield Road, Elmswell	4.09ha	106	SS0085	Residential	+	-	-	++	--	--	-	N/A	-	0	0	--?	-	0	--	+
LA063: Land south of Church Road, Elmswell	2.62ha	38	SS0096	Residential	+	0	0	+	--	--	-	N/A	+	--	0	0?	-	0	--	+

Allocation Policy	Size	Dwellings	Site ref.	Purpose	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
LA064: Land north of Church Road, Elmswell	2.94ha	60	SS0039	Residential	+	-	0	+	--	--	--	N/A	0	0	-?	-?	-	0	--	++
LA065: Land north west of School Road, Elmswell	4.2ha	50	SS0107	Residential	+?	0	0	+	--	--	-	N/A	+	0	0	-?	-	0	--	++
LA066: Land west of Station Road, Elmswell	4.18ha	100	SS0132	Residential	+	-	0	+	--	--	-	N/A	+	0	0	-?	-	0	--	++
LA020: Land north of Magdalen Street, Eye	2.5ha	80	SS1118	Residential	+++?	++	+	+	--	0	++	N/A	++	0	--?	-?	?	--	++	+
LA021: Land north of Church Street, Eye	0.34ha	12	SS0672	Residential	+	++	+	+	-	0	++	N/A	++	0	-?	--?	0	0	++	+
LA099: Land at Eye Airfield, Eye	64ha	N/A	SS0928	Employment	N/A	N/A	+	N/A	--	-	-	N/A	+	--	--?	-?	-	++	--	+
LA109: Land south of Eye Airfield, Eye	7.1ha	174	SS1202	Residential	+?	+	++	+	-	0	-	N/A	++	-	-?	-	--	0	--	+
LA110: Land north of Millfield, Eye	1.3ha	34	SS0614	Residential	+?	+	++	+	-	0	-	N/A	++	0	0	-?	-	0	+	+
LA111: Allotments north of Millfield, Eye	1.4ha	72	SS0615	Residential	+++?	+	+	+	-	0	-	N/A	++	0	0	-?	-	0	+	+
LA010: Land south of Chalk Hill Lane and West of Hood Drive, Great Blakenham	0.7ha	8	SS0654	Residential	+	-	+	++	-	--	--	N/A	0	-	--?	-?	-	0	--	-
<i>LA067: Land South of Bacton Road, Haughley</i>	<i>4ha</i>	<i>98</i>	<i>SS0004</i>	<i>Residential</i>	<i>+</i>	<i>0</i>	<i>-</i>	<i>++</i>	<i>--</i>	<i>--</i>	<i>-</i>	<i>N/A</i>	<i>-</i>	<i>0</i>	<i>--?</i>	<i>-?</i>	<i>-</i>	<i>0</i>	<i>--</i>	<i>-</i>
<i>LA104: Land West of Fishponds Way, Haughley</i>	<i>2.8ha</i>	<i>98</i>	<i>SS0047</i>	<i>Residential</i>	<i>+</i>	<i>-</i>	<i>-</i>	<i>++</i>	<i>--</i>	<i>--</i>	<i>--</i>	<i>N/A</i>	<i>-</i>	<i>-</i>	<i>--?</i>	<i>-?</i>	<i>-</i>	<i>0</i>	<i>--</i>	<i>-</i>
<i>LA117: Land north of Station Road, Haughley</i>	<i>1.3ha</i>	<i>29</i>	<i>SS0270</i>	<i>Residential</i>	<i>+</i>	<i>-</i>	<i>-</i>	<i>++</i>	<i>--</i>	<i>-</i>	<i>--</i>	<i>N/A</i>	<i>-</i>	<i>0</i>	<i>0</i>	<i>0?</i>	<i>-</i>	<i>0</i>	<i>--</i>	<i>-</i>

Allocation Policy	Size	Dwellings	Site ref.	Purpose	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
LA073: Land south of Glebe Way, Mendlesham	5.3ha	75	SS0065	Residential	+++?	+	-	++	--	-	-	N/A	+	-	0?	-?	-	0	--	-
LA030: Land west of Stowmarket Road, Needham Market	2.1ha	66	SS1199	Residential	+	--	+	+	--	--	-	N/A	+	0	-?	-?	--	0	+	+
LA031: Former Needham Market Middle School, Needham Market	1.26ha	41	SS0669	Residential	++	0	+	+	--	--	++	N/A	++	-	--?	--?	0	0	++	++
LA032: Former Mid Suffolk District Council Offices and Car Park, Needham Market	2.62ha	94	SS0530	Residential	+	0	+	+	--	--	++	N/A	++	0	--?	--?	0	--	++	++
			SS1005	Residential	+	-	+	+	--	--	++	N/A	+	0	-?	0?	+	0	++	++
LA076: Land south of The Street, Stonham Aspal	1.9ha	35	SS0141	Residential	+	0	-	++	--	-	-	N/A	-	0	-?	-?	-	0	--	-
LA033: Land south of Gun Cotton Way, Stowmarket	3ha	68	SS0064	Residential	+	0?	++	+	--	--	--	N/A	++	0	--?	-?	0	0	-	+
LA034: Chilton Leys, Stowmarket	33ha	600	SS1022	Residential	++	+++?	-	++	--	-	--	N/A	++	-	--?	-	--	0	--	-
LA035: Ashes Farm, Stowmarket	22.8ha	575	SS0264	Residential	++	+	++	++	--	--	--?	N/A	++	-	-?	--?	-	0	+	++
LA036: Land south of Union Road, Stowmarket <sup>56</sup>	23.3ha	400	SS0029	Residential	++	++	+	++	--	--	-	N/A	++	0	-?	-?	-	0	--	+
			SS0157	Residential	+	++	0	++	--	--	-	N/A	+	0	-?	-?	-	0	--	+

<sup>56</sup> Sites SS0029 and SS0157 were both allocated in the Stowmarket Area Action Plan (2013) and 300 of the 400 dwellings have planning consent (i.e. are committed).

Allocation Policy	Size	Dwellings	Site ref.	Purpose	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
LA037: Former Stowmarket Middle School, Stowmarket	1ha	40	SS0101	Residential	++	++	+	+	--	-	++	N/A	++	0	0?	0?	0	0	++	++
LA038: Land south of Creting Road West, Stowmarket	0.88ha	25	SS0668	Residential	+	+	++	+	--	--	++	N/A	++	-	-?	0?	0	0	+	++
LA044: Land at Mill Lane, Stowmarket <sup>57</sup>	52ha	N/A	SS1223	Employment	N/A	N/A	+	N/A	--	-	-?	N/A	++	-	--?	-?	-	++	--	+
LA112: Land east and west of Prentice Road, Stowmarket	0.76ha	93	SS1288	Residential	+	0	++	+	--	--	-	N/A	++	-	--?	-?	0	0	++	++
LA108: Land south of Gun Cotton Way, Stowmarket	11ha	N/A	SS1032	Employment	N/A	N/A	+	N/A	--	--	--	N/A	++	-	--?	0?	0	+	-	++
LA077: Land south of Church Road, Stowupland	1.55ha	18	SS0151	Residential	+	++	0	++	--	-	-	N/A	+	0	0	-?	-	0	--	+
LA078: Land south of Stowmarket Road, Stowupland	17.8ha	300	SS1071	Residential	+	++	+	++	--	--	-	N/A	++	-	-?	-?	--	0	--	+
LA100: Land north of B1115, Stowupland	8.14ha	143	SS0073	Residential	+	+	+	++	--	--	-	N/A	++	--	0	-?	-	0	--	++
LA080: Land west of Queen Street, Stradbroke	3.2ha	75	SS0079	Residential	+++?	++	-	+	-	-	-	N/A	+	-	--?	--?	-	0	--	-
LA081: Land north of Laxfield Road, Stradbroke	2ha	45	SS1198	Residential	+	+	-	+	--	-	-	N/A	-	--	--?	-?	-	0	--	-

<sup>57</sup> Site SS1223 was allocated in the Stowmarket Area Action Plan (2013).

Allocation Policy	Size	Dwellings	Site ref.	Purpose	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
<i>LA082: Land south of New Street, Stradbroke</i>	4.2ha	60	SS1043	Residential	++	++	-	+	-	-	-	N/A	+	--	-?	-?	-	0	--	-
LA083: Land east of Farriers Close, Stradbroke	1.7ha	35	SS0681	Residential	++	++	-	+	-	-	-	N/A	+	-	-?	-?	-	0	--	-
<i>LA084: Land west of Meadow Lane, Thurston</i>	3.27ha	64	SS0019	Residential	+	++?	-	+	--	--	-	N/A	+	0	-?	-?	-	0	--	++
LA085: Land east of Church Road and south of Old Post Office Lane, Thurston	1.98ha	25	SS0090	Residential	+	+	-	+	--	--	-	N/A	+	0	-?	-?	-	0	--	+
LA086: Land south of Heath Road, Thurston	4.3ha	110	SS0319	Residential	0	+	+	++	--	--	-	N/A	+	0	-?	-?	-	0	--	++
LA087: Land south of Beyton Road, Thurston	7.9ha	200	SS0729	Residential	+	++	0	+	--	--	-	N/A	+	-	--?	0?	-	0	--	++
<i>LA088: Land west of Ixworth Road, Thurston</i>	13ha	250	SS0716	Residential	+	+	-	++	--	--	--	N/A	+	0	0	-?	-	0	--	+
LA089: Land east of Ixworth Road, Thurston	8.7ha	200	SS0075	Residential	+	+	-	+	--	--	--	N/A	+	0	0?	-?	-	0	--	++
<i>LA090: Land west of Barton Road, Thurston</i>	5.2ha	129	SS0006	Residential	+	+	0	+	--	--	-	N/A	+	0	--?	-?	-	0	--	+
<i>LA103: Land South of Barrells Road, Thurston</i>	1ha	6	SS0008	Residential	+	+	-	+	--	--	-	N/A	-	0	0	0?	-	0	--	-
<i>LA118: Land west of Church Road, Thurston</i>	3.8ha	15	SS0765	Residential	+	++	-	+	--	--	-	N/A	+	--	--?	-?	-	0	--	++

Allocation Policy	Size	Dwellings	Site ref.	Purpose	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
LA091: Land west of Wattisfield Road, Walsham le Willows	2.7ha	60	SS0040	Residential	-	+	-	++	-	--	-	N/A	-	0	0	0?	-	0	--	-
LA092: Land east of Wattisfield Road, Walsham le Willows	0.53ha	22	SS0369	Residential	-	+	-	++	-	-	-	N/A	-	0	0	0?	-	0	--	--
LA102: Land west of Old Norwich Road, Whitton	10ha	190	SS0033	Residential	+	-	++	+	--	--	-	N/A	+	--	--?	-?	-	0	--	+
LA093: Land East of Green Road, Woolpit	2.3ha	49	SS0093	Residential	++	+	+	+	--	--	-	N/A	++	0	0	-?	-	0	--	+
LA094: Land South of Old Stowmarket Road, Woolpit	6.52ha	120	SS0547	Residential	++	+	+	+	--	--	-	N/A	++	0	--?	-?	-	0	--	+
LA095: Land north east of The Street, Woolpit	36.2ha	500	SS0670	Residential	++	+	+	+	--	--	-?	N/A	++	0	-?	-?	--	0	--	+
LA097: Land west of Heath Road, Woolpit	1.7ha	30	SS0783	Residential	++	+	+	+	--	--	-	N/A	++	--	0	-?	-	0	--	+
LA120: Lawn Farm, Woolpit	17ha	N/A	SS0773	Employment	N/A	N/A	+	N/A	--	--	--	N/A	-	-	--?	-?	--	++	--	-

## Cumulative effects

### Introduction

**7.456** It is a requirement of the SEA Regulations to identify cumulative effects. With respect to the JLP, these can be divided into three categories:

- The cumulative effects of site allocations on individual settlements in the JLP.
- The cumulative effects of the policies in the JLP as a whole.
- The cumulative effects of the JLP with development proposed in other plans or projects in Suffolk neighbouring authorities.

### Cumulative effects on individual settlements of JLP site allocations

**7.457** A large number of settlements have more than one allocation, whether residential or employment, assigned to in the JLP. In many instances, the allocations represent sites that have been granted planning consent since the start of the Plan period (i.e. 1 April 2018). In others, the allocations are of a small scale, both individually and cumulatively for a particular settlement. There are, though, a number of settlements remaining where new allocations add together and/or with existing commitments to result in a significant increase in the scale of development.

**7.458** The appraisal of the cumulative effects, however, will reflect the size of the settlement concerned, as well as the sensitivities of the location where development is planned to take place.

**7.459** The analysis below seeks to draw out where cumulative effects at a settlement level are most likely to occur.

### Settlements where all site allocations are already committed

**7.460** Those settlements where there is more than one site allocation, but where the sites already have planning consent are as follows:

- Bacton (Mid Suffolk) – 267 dwellings across four sites.
- Badwell Ash (Mid Suffolk) – 119 dwellings across four sites.
- Botesdale & Rickinghall (Mid Suffolk) – 151 dwellings across three sites.
- Cockfield (Babergh) – 61 dwellings across two sites.
- East Bergholt (Babergh) – 229 dwellings across 3 sites.

- Haughley (Mid Suffolk) – 192 dwellings across three sites.
- Laxfield (Mid Suffolk) – 62 dwellings across two sites.
- Needham Market (Mid Suffolk) – 201 dwellings across four sites.
- Rattlesden (Mid Suffolk) – 30 dwellings across two sites.
- Stutton (Babergh) – 54 dwellings across three sites.
- Walsham-le-Willows (Mid Suffolk) – 82 dwellings across two sites.

**7.461** Given that these sites already have planning consent, the cumulative effects on these settlements have not been appraised.

### Settlements where the total number of dwellings allocated is small scale

**7.462** Those settlements, which tend to be Hinterland Villages or Hamlets, that have more than one site allocation, but where the total number of homes is small scale at the JLP level are as follows:

- Aldham (Babergh) – 12 dwellings across two sites, of which seven dwellings already have planning consent.
- Beyton (Mid Suffolk) – 19 dwellings across two sites, of which nine dwellings already have planning consent.
- Brome & Oakley (Mid Suffolk) – 15 dwellings across two sites, none of which have planning consent.
- Chelmondiston (Babergh) – 39 dwellings across two sites, of which 24 dwellings already have planning consent.
- Finningham (Mid Suffolk) – 20 dwellings across two sites, none of which have planning consent.
- Lawshall (Babergh) – 20 dwellings across two sites, of which five dwellings already have planning consent.
- Long Thurlow (Mid Suffolk) – 15 dwellings across two sites, none of which have planning consent.
- Raydon (Babergh) – 34 dwellings across two sites, of which 24 dwellings already have planning consent.
- Stoke by Nayland (Babergh) – 26 dwellings across three sites, of which none have planning consent.
- Stonham Parva (Mid Suffolk) – 10 dwellings across two sites, none of which have planning consent.
- Thwaite (Mid Suffolk) – 15 dwellings across two sites, of which none have planning consent.
- Wetheringsett (Mid Suffolk) – 20 dwellings across two sites, none of which have planning consent.

- Woolverstone (Babergh) – 10 dwellings across two sites, none of which have planning consent.
- Worlingworth (Mid Suffolk) – 31 dwellings across two sites, of which 24 dwellings already have planning consent.
- Yaxley (Mid Suffolk) – 35 dwellings across two sites, none of which have planning consent.

**7.463** Given the small cumulative scale of development at these settlements, and that each site has been appraised individually, it is considered that the cumulative effects on these settlements is unlikely to be significant beyond the effects already identified at a site level. Some of these settlements are subject to Neighbourhood Plans, which contain the allocations listed above.

#### Settlements where the additional allocations over and above existing commitments are small scale

**7.464** There are a number of settlements where some allocations represent sites that already have planning consent, but where there are additional small scale allocations in the JLP that do not yet have planning consent. These are as follows:

- Creeting St Mary (Mid Suffolk) – 48 dwellings across two sites, of which 43 dwellings already have planning consent.
- Great Waldingfield (Babergh) – 52 dwellings across two sites, of which 32 dwellings already have planning consent.
- Old Newton (Mid Suffolk) – 130 dwellings across three sites, of which 120 dwellings already have planning consent.

**7.465** The cumulative effects on these settlements have not been appraised because of the small scale of the sites that have yet to receive planning consent.

#### Settlements where there is potential for cumulative effects from site allocations

**7.466** There are 15 settlements where there are site allocations that have not yet received planning consent that could combine to give cumulative effects on the settlements concerned, both positive and negative. It should be noted that, where there are a number of allocations, particularly large allocations that will take a long time to build out, during the period of construction there could be temporary negative effects on local residents from noise, dust and air pollution, and heavy traffic movements, although these will be mitigated as far as possible by conditions of operation placed on the land developers.

**7.467** The potential permanent cumulative effects of the allocations in the JLP for each of the 15 settlements, focusing in particular on those yet to receive planning consent, are described below.

#### Barham (Mid Suffolk)

**7.468** Barham has three allocations in the JLP for 615 dwellings in total, plus an allocation for a further 75 dwellings in the parish of Claydon, which abuts the allocations in Barham:

- Allocation LA001, Land east of Norwich Road, Barham, for 325 dwellings, which does not have planning consent.
- Allocation LA002, Land north of Church Lane, Barham, for 270 dwellings, which does not have planning consent.
- Allocation LA003, Land south of Church Lane, Claydon, for 75 dwellings, which does not have planning consent.
- Allocation L119, Land north of Pesthouse Lane, Barham, for 20 dwellings, which has planning consent.

**7.469** All three of the sites yet to receive planning consent, comprising 670 dwellings in total, are adjacent to one another to the north of Barham. Together, they will significantly increase the size of Barham over the Plan period.

**7.470** Each of the three allocations were individually found to have significant positive effects against SA Objective 1 (Health and Wellbeing), SA Objective 4 (Housing), and SA Objective 9 (Climate Change Mitigation), and two of the site allocations recorded significant positive effects against SA Objective 2 (Education and Skills), and therefore in-combination they will give rise to cumulative significant positive effects on these SA Objectives. In combination, these sites will make a significant contribution to housing delivery, they are well located for health services and secondary school provision as well recreational facilities, and they will deliver a new primary school, plus further investment in such facilities. Given the sites' location to services and facilities, or provision of such facilities through development of the sites, plus access to bus services and cycle ways, a cumulative significant positive effect on climate change mitigation is expected. The combination of the additional homes may help to provide support for local services and facilities, including shops.

**7.471** Each of the three allocations were considered to have significant negative effects on SA Objective 6 (Air and Noise). In-combination, the three sites could lead to additional traffic travelling through the AQMAs in Ipswich, resulting in additional air pollution.

**7.472** Two of the three sites recorded significant negative effects on SA Objective 7 (Soils and Minerals), SA Objective

11 (Biodiversity and Geodiversity) and SA Objective 13 (Landscape/Townscape). In combination, the sites could result in the permanent significant loss of best and most versatile agricultural land and potentially sterilise mineral resources, they could lead to a cumulative significant indirect effect on biodiversity, although ecological survey and any mitigation measures are required. With respect to landscape, mitigation is provided for in the policies, but it is still considered that there will be a residual cumulative significant effect on the landscape. All the allocations recorded at least three minor negative effects against the four site assessment criteria for SA Objective 5 (Water), meaning there is the potential for cumulative significant negative effects on this SA Objective prior to mitigation.

#### **Bramford (Mid Suffolk)**

**7.473** Bramford has three allocations in the JLP for 304 dwellings in total:

- Allocation LA007, Land east of The Street, Bramford, for 190 dwellings, which has planning consent.
- Allocation LA107, Land between Bramford Road and the A14, Bramford for 14 dwellings, which has planning consent.
- Allocation LA006, Land south of Fitzgerald Road, Bramford, for 100 dwellings, which does not have planning consent.

**7.474** Allocation LA007 lies to the north of Bramford and is adjacent to another residential site that is being constructed. Allocation LA006 lies to the south of Bramford. Allocation LA107 is a small site allocation and unlikely to give rise to cumulative significant effects.

**7.475** Given the distance between the two larger sites, and the presence of the village of Bramford in-between, it is considered that the potential for cumulative significant effects is limited. However, the allocations in-combination will result in a cumulative significant positive effect on SA Objective 4 (Housing) due to their contribution to the overall housing need identified in the JLP. The combination of the additional homes may help to provide support for local services and facilities, including shops.

**7.476** The main cumulative significant negative effects are likely to be in relation to SA Objective 6 (Air and Noise) from in-combination effects of additional traffic travelling through the AQMAs in Ipswich, and in relation to SA Objective 7 (Soils and Minerals) from the loss of best and most versatile agricultural land. All the allocations recorded at least three minor negative effects against the four site assessment criteria for SA Objective 5 (Water), meaning there is the potential for cumulative significant negative effects on this SA Objective prior to mitigation.

#### **Capel St Mary (Babergh)**

**7.477** Capel St Mary has two allocations in the JLP for 650 dwellings in total:

- Allocation LA054, Land east of Longfield Road, Capel St Mary, for 100 dwellings, which has planning consent.
- Allocation LA055, Land south-west of Rembrow Road, Capel St Mary, for 550 dwellings, which does not have planning consent.

**7.478** Allocation LA054 is to the north-east of Capel St Mary, whereas Allocation LA055 is to the south-west of the village, reducing the potential for direct cumulative effects between the two developments. However, together, they will significantly increase the size of Capel St Mary over the Plan period.

**7.479** Together, the allocations will result in a cumulative significant positive effect on SA Objective 4 (Housing) due to their contribution to the overall housing need identified in the JLP. Cumulative significant positive effects are expected for SA Objective 1 (Health and Wellbeing) due to the contributions to healthcare provision and open space. The combination of the additional homes may help to provide support for local services and facilities, including shops.

**7.480** There is the potential for significant negative cumulative effects in relation to SA Objective 6 (Air and Noise) from in-combination effects of additional traffic travelling through the AQMAs in Ipswich, and in relation to SA Objective 7 (Soils and Minerals) from the loss of best and most versatile agricultural land. There is also the potential for cumulative significant indirect negative effects on SA Objective 11 (Biodiversity and Geodiversity) although the allocation policy for LA055 states that an ecological survey and any necessary mitigation measures will be provided. Both allocations recorded at least three minor negative effects against the four site assessment criteria for SA Objective 5 (Water), meaning there is the potential for cumulative significant negative effects on this SA Objective prior to mitigation.

#### **Copdock and Washbrook (Babergh)**

**7.481** Copdock and Washbrook have two allocations in the JLP for 238 dwellings in total:

- Allocation LA008, Land south-east of Back Lane, Copdock and Washbrook, for 226 dwellings, which does not have planning consent.
- Allocation LA009, Land south-west of London Road, Copdock and Washbrook, for 12 dwellings, which does not have planning consent.

**7.482** Although Allocation LA008, between Copdock and Washbrook, will significantly increase the size of these villages, given the small scale of Allocation LA009, and its

distance from Allocation LA008, is not considered that any cumulative significant direct effects will result from the two developments coming forward, beyond the individual effects identified for each site in this SA Report. It is noted that both allocations recorded at least three minor negative effects against the four site assessment criteria for SA Objective 5 (Water), meaning there is the potential for cumulative significant negative effects on this SA Objective prior to mitigation.

### Debenham (Mid Suffolk)

**7.483** Debenham has three allocations in the JLP for 245 dwellings in total:

- Allocation LA056, Land south of Low Road, Debenham, for 18 dwellings, which does not have planning consent.
- Allocation LA057, Land north of Ipswich Road, Debenham, for 140 dwellings, which does not have planning consent.
- Allocation LA058, Land east of Aspell Road, Debenham, for 87 dwellings, which does not have planning consent.

**7.484** Allocation LA056 and Allocation LA057 adjoin one another to the south of Debenham, together delivering 158 dwellings. Allocation LA058 lies to the north of Debenham. Given that Allocation LA056 is for a relatively small number of dwellings, it is not considered that the cumulative effects with Allocation LA057 will be significant. Given the distance between Allocations LA056 and LA057 and Allocation LA058, with the core of the village in-between, it is considered that the potential for direct cumulative effects is limited.

**7.485** In-combination, there is the potential for cumulative significant positive effects on SA Objective 1 (Health and Wellbeing), due to the proximity of the sites to healthcare and recreational facilities. The combination of the additional homes may help to provide support for local services and facilities, including shops, of the District Centre of Debenham, resulting in a cumulative significant positive effect on SA Objective 15 (Town Centres).

**7.486** There is the potential for cumulative significant indirect negative effects on SA Objective 11 (Biodiversity and Geodiversity) but no mitigation is identified in the allocation policies. All three allocations recorded at least three minor negative effects against the four site assessment criteria for SA Objective 5 (Water), meaning there is the potential for cumulative significant negative effects on this SA Objective prior to mitigation.

### Elmswell (Mid Suffolk)

**7.487** Elmswell has five allocations in the JLP for 354 dwellings in total:

- Allocation LA062, Land east of Ashfield Road, Elmswell, for 106 dwellings, which has planning consent.
- Allocation LA063, Land south of Church Road, Elmswell, for 38 dwellings, which has planning consent.
- Allocation LA064, Land north of Church Road, Elmswell, for 60 dwellings, which does not have planning consent.
- Allocation LA065, Land north-west of School Road, Elmswell, for 50 dwellings, which does not have planning consent.
- Allocation LA066, Land west of Station Road, Elmswell, for 100 dwellings, which does not have planning consent.

**7.488** The two allocation sites with planning consent are to the north and south of Elmswell. The three Allocations that do not have planning consent are on the western edge of Elmswell. Allocation LA066 is separated from Allocations LA064 and LA065 by the railway line. Allocations LA064 and LA065 are in close proximity to one another, although they do not adjoin.

**7.489** Together, the allocations will result in a cumulative significant positive effect on SA Objective 4 (Housing) due to their contribution to the overall housing need identified in the JLP. The three new allocations are well located to sustainable transport services, including rail, and therefore together are likely to result in a cumulative significant positive effect on SA Objective 16 (Sustainable Travel). The combination of the additional homes may help to provide support for local services and facilities, including shops.

**7.490** All of the Allocations could give rise to cumulative significant negative effects on SA Objective 6 (Air and Noise) as together they could generate additional traffic travelling through the AQMAs in the Bury St Edmunds area. Two of the Allocations are in Source Protection Zone 1, which means they could result in cumulative significant negative effects on SA Objective 5 (Water), and all the allocations recorded at least three minor negative effects against this SA Objective prior to mitigation.

### Eye (Mid Suffolk)

**7.491** Eye has five allocations in the JLP for 372 dwellings and one allocation for 64 hectares of employment land in total:

- Allocation LA020, Land north of Magdalen Street, Eye, for 80 dwellings, which does not have planning consent.
- Allocation LA021, Land north of Church Street, Eye, for 12 dwellings which does not have planning consent.
- Allocation LA099, Land at Eye Airfield, Eye, for 64 hectares of employment land, which does not have planning consent.

- Allocation LA109, Land south of Eye Airfield, Eye, for 174 dwellings, which does not have planning consent.
- Allocation LA110, Land north of Millfield, Eye, for 34 dwellings, which does not have planning consent.
- Allocation LA111, Land at allotments north of Millfield, Eye, for 72 dwellings, which does not have planning consent.

**7.492** Allocations LA020 and LA021 are within the built-up area of Eye, and are separated from each other and from the other allocations in Eye, and are therefore unlikely to have direct cumulative effects with each other or any of the other allocations. Allocations LA109, LA110 and LA111 form a nearly contiguous area of land extending the built-up area northwards to the edge of Eye Airfield, delivering 280 dwellings. Allocation LA099, for employment uses is on Eye Airfield itself, to the north-west.

**7.493** Taken together, the allocations are likely to have a cumulative significant positive effect on SA Objective 4 (Housing) because of the number of homes to be delivered, making an important contribution to housing need in the JLP area. Some of the allocations are well located to, and will help to support local shops, services and facilities, including healthcare and schools, and are well located for employment opportunities resulting in cumulative significant positive effects on SA Objective 1 (Health and Wellbeing), SA Objective 2 (Education and Skills), SA Objective 3 (Accessibility), and potentially for SA Objective 15 (Town Centres) although some allocations are beyond acceptable walking distance from Eye town centre. For similar reasons, it is anticipated that there will be a cumulative significant positive effect on SA Objective 9 (Climate Change Mitigation).

**7.494** There is the potential for cumulative significant indirect negative effects on SA Objective 11 (Biodiversity and Geodiversity), although mitigation is included in the policy for Allocation LA099. Two of the allocations recorded at least three minor negative effects against the four site assessment criteria for SA Objective 5 (Water), and Allocation LA020 is in Source Protection Zone 1, meaning there is the potential for cumulative significant negative effects on this SA Objective prior to mitigation.

**7.495** It should be noted that consultees commented on the impact of traffic on the local road network in the vicinity of Eye when responding to the SA Scoping Report, although these comments related primarily to heavy good vehicles serving the poultry sector.

#### **Great Cornard (Babergh)**

**7.496** Great Cornard has three allocations in the JLP for 554 dwellings in total:

- Allocation LA040, Land west of Bures Road, Great Cornard, for 46 dwellings, which has planning consent.
- Allocation LA039, Land east of Kings Hill, Great Cornard, for 8 dwellings, which has planning consent.
- Allocation LA042, Land at Tye Farm, Great Cornard, for 500 dwellings, which does not have planning consent.

**7.497** Although a distinct settlement in its own right, Great Cornard lies adjacent to Sudbury, one of the Market Towns and Urban Areas in Babergh. The two allocations with planning consent lie on the western edge of Great Cornard and are considered too small and too distant from the large Allocation LA042 to result in cumulative significant effects beyond those identified for the individual development proposals, also taking into account the size of Great Cornard and neighbouring Sudbury.

**7.498** It should also be noted that Allocation LA041, Land north-west of Waldingfield Road, Chilton, for 130 dwellings, which has planning consent, adjoins the north-eastern edge of Sudbury, but is considered to be too far distant from Great Cornard, with the large Chilton Industrial Estate in-between, to result in cumulative significant direct effects with the allocations in Great Cornard. Together, though, they will reinforce the significant positive effect in relation to SA Objective 4 (Housing) and could potentially give rise to in-combination significant negative effects from additional traffic pollution on the AQMA in Sudbury in relation to SA Objective 6 (Air and Noise). Two of the allocations recorded at least three minor negative effects against the four site assessment criteria for SA Objective 5 (Water), and Allocation LA040 is in Source Protection Zone 1, meaning there is the potential for cumulative significant negative effects on this SA Objective prior to mitigation.

#### **Hadleigh (Babergh)**

**7.499** Hadleigh has four allocations in the JLP for 746 dwellings (including 5.5 hectares of employment land) in total:

- Allocation LA027, Former Babergh District Council Offices, Hadleigh, for 50 dwellings, which does not have planning consent.
- Allocation LA028, Land north-east of Frog Hall Lane, Hadleigh, for 600 dwellings and 5.5 hectares of employment land, which does not have planning consent.
- Allocation LA114, Land north of Red Hill Road/ Malyon Road, Hadleigh, for 75 dwellings, which does not have planning consent.
- Allocation LA115, Angel Court, Angel Street, Hadleigh, for 21 dwellings, which has planning consent.

**7.500** The largest allocation in Hadleigh is Allocation LA028, which is a greenfield site on the eastern edge of Hadleigh. Two of the other allocations are brownfield sites within the urban area, and the remaining site, Allocation LA114, is a greenfield site to the north of Hadleigh. A significant amount of built development including an industrial estate lies between Allocation LA028 and Allocation LA114.

**7.501** Given the relatively small scale of three of the allocations, and their location with respect to each other and to the large Allocation LA028, and taking into account the size of Hadleigh, it is not considered that there will be cumulative significant effects beyond those identified for the individual allocations. Together, though, they will reinforce the significant positive effect already identified for Allocation LA028 in relation to SA Objective 4 (Housing).

### **Sproughton (Babergh)**

**7.502** Sproughton has four allocations in the JLP for 1,430 dwellings, including 4 hectares of employment land, and one allocation for 50 hectares of employment land in total:

- Allocation LA012, Land north of Burstall Lane and West of B1113, Sproughton, for 105 dwellings, which does not have planning consent.
- Allocation LA013, Land north of the A1071, Sproughton, for 800 dwellings, which does not have planning consent.
- Allocation LA014, Land at Poplar Lane, Sproughton, for 475 dwellings and 4 hectares of employment land, which has planning consent.
- Allocation LA018, Sproughton Enterprise Park / Former Sugar Beet Factory Site, Sproughton, for 50 hectares of employment land, which does not have planning consent.
- Allocation LA116, Land east of Loraine Way, Sproughton, for 50 dwellings, which does not have planning consent.

**7.503** A considerable amount of development is planned for Sproughton, which lies on the western fringe of the Ipswich urban area. The majority of allocated development will take place to the east of the A14, which separates Sproughton village from the edge of Ipswich urban area along with the River Gipping. Only Allocation LA012 and Allocation LA116 lie to the west of the A14, on the northern edge of Sproughton village itself.

**7.504** The main cumulative effects are likely to arise from the in-combination of Allocation LA013 and Allocation LA014, which adjoin each other to the south of the River Gipping, and Allocation LA018 which lies to the north of the River Gipping. These comprise the regeneration of the former sugar beet

factory to create new employment uses, as well as significant amounts of new homes and associated community facilities including a new pre-school and primary school. The sites taken together they have the potential to significantly change this part of the Ipswich Fringe.

**7.505** A number of both significant positive and significant negative effects were identified for the individual allocations. Cumulatively, the significant positive effects are considered to be as follows. The allocations will make a cumulative significant contribution to SA Objective 4 (Housing) not only because of the scale of housing proposed, but also because the housing will be delivered in an area where it is considered to be significant housing deprivation. Cumulative significant positive effects are anticipated with respect to SA Objective 14 (Economic Growth) due to the regeneration of former employment land and the addition of new employment land. Cumulative significant positive effects will arise with respect to SA Objective 1 (Health and Wellbeing) and SA Objective 3 (Accessibility) because of the alignment of jobs, homes and services, and the potential for the developments to combine to help address deprivation issues in the area. For the same reason and also because of the access to buses and cycleways, a cumulative significant positive effect on SA Objective (Climate Change Mitigation) is expected.

**7.506** The cumulative significant effects that are recorded relate to SA Objective 6 (Air and Noise) because of the potential for large amounts of traffic to be generated in-combination potentially going through the AQMAs in Ipswich as well as the potential effects of noise from the A14, and SA Objective 11 (Biodiversity and Geodiversity) because of the potential cumulative significant indirect effects on biodiversity given the area's location with respect to sensitive receptors. Mitigation for these potential significant negative effects are included in some of the allocation policies. All but one of the allocations recorded at least three minor negative effects against the four site assessment criteria for SA Objective 5 (Water), meaning there is the potential for cumulative significant negative effects on this SA Objective prior to mitigation.

**7.507** For SA Objective 7 (Soils and Minerals) the cumulative significant effects are mixed, as the allocations will result in the re-use of large tracts of brownfield land but they could also result in the loss of best and most versatile agricultural land where greenfield land is to be developed.

### **Stowmarket (Mid Suffolk)**

**7.508** Stowmarket has seven allocations in the JLP for 1,768 dwellings, plus an allocation for 11 hectares of employment land and an allocation of 52 hectares for a combination of uses including employment land, open space and recreation:

- LA033, Land south of Gun Cotton Way, Stowmarket, for 68 dwellings, which has planning consent.
- LA034, Chilton Leys, Stowmarket, for 600 dwellings, which has planning consent.
- LA035, Ashes Farm, Stowmarket, for 575 dwellings, which does not have planning consent.
- LA036, Land south of Union Road, Stowmarket, for 400 dwellings, of which 300 have planning consent.
- LA037, Former Stowmarket Middle School, Stowmarket, for 40 dwellings, which does not have planning consent.
- LA038, Land south of Creeting Road West, Stowmarket, for 25 dwellings, which does not have planning consent.
- LA044, Land at Mill Lane, Stowmarket, for 52 hectares of employment land, open space, leisure and recreation land use with associated infrastructure, which does not have planning consent.
- LA108, Land south of Gun Cotton Way, Stowmarket, for 11 hectares of employment land, which has planning consent.
- LA112, Land east and west of Prentice Road, Stowmarket, for 60 dwellings, which has planning consent (in addition, 33 dwellings were granted planning consent on this site prior to the start date of the JLP).

**7.509** A number of the allocations are existing allocations from the Stowmarket Area Action Plan (2013) and have Development Briefs, which set out the general development principles of the site. These are:

- LA033 – Chilton Leys Development Brief (December 2013).
- LA035 – Ashes Farm Development Brief and Delivery Framework (November 2016).
- LA036 – Land south of Union Road (Draft) Development Brief (April 2016).
- LA044 – Mill Lane Development Brief (February 2013).

**7.510** Allocation LA018 is within an established built-up area and is already under construction. Allocations LA037, LA038 and LA112 are comparatively small sites within the main urban area of Stowmarket and unlikely to give rise to cumulative significant effects with the other allocations. Allocation LA033, is also relatively small in the context of Stowmarket, but is a greenfield site that is otherwise surrounded by development to the north, east and west, and adjoins Allocation LA044 to the south, which is a large allocation for employment, open space, leisure and recreation uses. Allocations LA034 and LA036 adjoin one another to form an extension of 1,000 dwellings to the western edge of

Stowmarket. Allocation LA035 does not adjoin any of the other allocations, and effectively extends the urban area to the north of Stowmarket up to the A14.

**7.511** The allocations cumulatively will result in significant growth to Stowmarket, even though the town is already the largest within Mid Suffolk. The various developments extend the boundaries of the built-up area particularly westwards and eastwards, but also up to the A14 northwards. Some of the allocations have been established for some time through the Stowmarket Area Action Plan, although not all of these have planning consent.

**7.512** Cumulatively, the developments should make a significant positive contribution to SA Objective 4 (Housing) given the numbers of homes proposed. While they could place pressure on local services and facilities, the allocation policies include either the provision of, or financial contributions to, the delivery of community services and facilities such as healthcare and schools, resulting in cumulative significant positive effects on SA1 (Health and Wellbeing) and SA2 (Education and Skills). Cumulative significant positive effects are anticipated with respect to SA Objective 14 (Economic Growth) due to the aggregation of employment land being provided. Cumulative significant positive effects are also expected to arise with respect to SA Objective 3 (Accessibility) because of the alignment of jobs, homes and services, and the potential for the developments to combine to help address deprivation issues in the area. For similar reasons, cumulative significant effects are anticipated in relation to SA Objective 16 (Sustainable Travel) and SA Objective 9 (Climate Change Mitigation). Although a number of the allocations are beyond walking distance of the town centre, and therefore score significant negative effects in this respect in relation to SA Objective 15 (Town Centres), the developments are likely, cumulatively, to provide support for the services and shops of Stowmarket town centre.

**7.513** In-combination, there is the potential for cumulative significant indirect negative effects on SA Objective 11 (Biodiversity and Geodiversity), although it is noted that Allocation L044 includes significant open space and potential for biodiversity net gain. Given the amount of potential best and most versatile agricultural land that could be lost to development, a cumulative significant negative effect is recorded for SA Objective 7 (Soils and Minerals) although it is also recognised that some of the sites comprise brownfield land, and so this is mixed with cumulative significant positive effects against this SA Objective. A number of the sites could experience noise pollution, resulting in a cumulative significant negative effect against SA Objective 6 (Noise and Air), although some of the allocation policies include mitigation in relation to the A14. Although Allocation LA035 received a significant negative effect with respect to SA Objective 12 (Historic Environment) and Allocation LA034 received a

significant negative effect against SA Objective 14 (Landscape/Townscape) all other allocations recorded minor effects and therefore it is not considered that there will be significant cumulative effects for these SA Objectives. All the allocations recorded at least three minor negative effects against the four site assessment criteria for SA Objective 5 (Water), meaning there is the potential for cumulative significant negative effects on this SA Objective prior to mitigation.

**7.514** In addition, there is the potential for cumulative effects with development in Stowupland, which is located close to Stowmarket, but separated by the A14.

#### **Stowupland (Mid Suffolk)**

**7.515** Stowupland has three allocations in the JLP for 461 dwellings in total:

- LA077, Land south of Church Road, Stowupland, for 18 dwellings, which has planning consent.
- LA078, Land south of Stowmarket Road, Stowupland, for 300 dwellings, which does not have planning consent.
- LA100, Land north of B1115, Stowupland, for 143 dwellings, which has planning consent.

**7.516** Allocation LA078 is a relatively small site to the east of the village, and is unlikely to give rise to cumulative significant effects with the other two allocations. Allocation LA078 and LA100 are to the south-west of the village and, although, separate allocations, they effectively meet where they abut the B1115.

**7.517** In combination, the allocations should make a significant positive contribution to SA Objective 4 (Housing), and given their access to services and facilities, and the provision of a new primary school in Allocation LA078, they are considered to be make a significant contribution to SA Objective 9 (Climate Change Mitigation).

**7.518** All the allocations recorded at least three minor negative effects against the four site assessment criteria for SA Objective 5 (Water), meaning there is the potential for cumulative significant negative effects on this SA Objective prior to mitigation.

**7.519** Although, individually, potentially significant negative effects have been identified for the allocations, no further cumulative significant effects are identified, although it is noted that together Allocation LA078 and LA100 will represent both significant growth and extension of Stowupland south-westwards up to the A14, with resultant effects on SA Objective (Landscape/Townscape) and will also be potentially affected by noise from the A16 in relation to SA Objective 6

(Air and Noise), although these issues are recognised in the allocation policy for Allocation LA078.

**7.520** It should be noted that the two main access routes from Stowupland to Stowmarket (which is the closest location for large numbers of jobs) are via the B1115 and the A1120, which could increase congestion on these routes during peak hours.

#### **Stradbroke (Mid Suffolk)**

**7.521** Stradbroke has four allocations in the JLP for 215 dwellings in total:

- LA080, Land west of Queen Street, Stradbroke, for 75 dwellings, which does not have planning consent.
- LA081, Land north of Laxfield Road, Stradbroke, for 45 dwellings, which does not have planning consent.
- LA082, Land south of New Street, Stradbroke, for 60 dwellings, which has planning consent.
- LA083, Land east of Farriers Close, Stradbroke, for 35 dwellings, which does not have planning consent.

**7.522** The four allocations provide for relatively small scale extensions to the north, south, east and west of the village of Stradbroke. Although individually they do not result in large amounts of growth, taken together they represent a considerable expansion in the number of homes for the village, although not to the extent that they will make a significant contribution to the overall needs of the JLP area.

**7.523** The allocations are well located with respect to healthcare and recreation facilities, and public rights of way, resulting in cumulatively significant positive effects on SA Objective 1 (Health and Wellbeing), and also to schools resulting in cumulative significant positive effects on SA Objective 2 (Education and Skills).

**7.524** There is the potential for cumulative significant negative effects on SA Objective 10 (Climate Change Adaptation) due to potential flood risk, and potentially cumulative significant indirect effects on SA Objective 11 (Biodiversity and Geodiversity).

**7.525** It should be noted that consultees commented on the impact of traffic on the local road network in the vicinity of Stradbroke when responding to the SA Scoping Report, although these comments related primarily to heavy good vehicles serving the poultry sector.

#### **Thurston (Mid Suffolk)**

**7.526** Thurston has nine allocations in the JLP for 999 dwellings in total:

- LA084, Land west of Meadow Lane, Thurston, for 64 dwellings, which has planning consent.

- LA085, Land east of Church Road and south of Old Post Office Lane, Thurston, for 25 dwellings, which does not have planning consent.
- LA086, Land south of Heath Road, Thurston, for 110 dwellings, which does not have planning consent.
- LA087, Land south of Beyton Road, Thurston, for 200 dwellings, which does not have planning consent.
- LA088, Land west of Ixworth Road, Thurston, for 250 dwellings, which has planning consent.
- LA089, Land east of Ixworth Road, Thurston, for 200 dwellings, which does not have planning consent.
- LA090, Land west of Barton Road, Thurston, for 129 dwellings, which has planning consent.
- LA103, Land south of Barrells Road, Thurston, for 6 dwellings, which has planning consent.
- LA118, Land to the West of Church Road, Thurston, for 15 dwellings, which has planning consent.

**7.527** The allocations are spread out in all directions around the edge of the village of Thurston, with only two allocations physically joined, being Allocation LA088 and Allocation LA089 to the north of Thurston, comprising 450 dwellings in total. Given the size of Thurston, there are some significant allocations in their own right but in aggregate, the allocations will significantly increase the size of Thurston. Allocation LA085, Allocation LA1103 and Allocation LA118 are small allocations that are unlikely to give rise to cumulative significant direct effects.

**7.528** The allocations will have a significant cumulative significant positive effect on SA Objective 4 (Housing), because the amount of homes to be delivered will make a significant contribution to housing need in the JLP area. The access to existing and additional educational facilities will result in a cumulative significant positive effect on SA Objective 2 (Education and Skills). Although there is no healthcare facility in the village, the combination of the additional homes may help to provide support for local services and facilities, including shops. Because the village is served by both rail and buses, a cumulative significant positive effect on SA Objective 16 (Sustainable Travel) is anticipated. Because of all these factors, a cumulative significant positive effect on SA Objective 9 (Climate Change Mitigation) is also anticipated.

**7.529** The two adjoining allocations, Allocation LA088 and Allocation LA089, could have a cumulative significant negative effect on SA Objective 7 (Soils and Minerals) due to the potential permanent loss of best and most versatile agricultural land to development. Despite the sustainable travel options, the additional traffic generated by the

allocations in Thurston could lead to a cumulative significant negative effect on SA Objective 6 (Air and Noise) because of the AQMAs in nearby Bury St Edmunds and Great Barton. All the allocations recorded at least three minor negative effects against the four site assessment criteria for SA Objective 5 (Water), meaning there is the potential for cumulative significant negative effects on this SA Objective prior to mitigation.

### Woolpit (Mid Suffolk)

**7.530** Woolpit has four allocations in the JLP for 699 dwellings and one allocation for 17 hectares of employment land in total:

- LA093, Land east of Green Road, Woolpit, for 49 dwellings, which has planning consent.
- LA094, Land south of Old Stowmarket Road, Woolpit, for 120 dwellings, which has planning consent.
- LA095, Land north-east of The Street, Woolpit, for 500 dwellings, which does not have planning consent.
- LA097, Land west of Heath Road, Woolpit, for 30 dwellings, which does not have planning consent.
- LA120, Lawn Farm, Woolpit, for 17 hectares of employment land, which has planning consent.

**7.531** Allocation LA093, Allocation LA094 and Allocation LA097 are separate allocations on the south-eastern edge of the village. Allocation LA095 is a large allocation to the north of Woolpit, extending the village up to the A14. Allocation LA120 does not adjoin the village itself but is to the east of Junction of 47A of the A14. Together, these will significantly increase the size of Woolpit.

**7.532** The allocations will have a significant cumulative significant positive effect on SA Objective 4 (Housing), because the amount of homes to be delivered will make a significant contribution to housing need in the JLP area. They will also have a cumulative significant positive effect on SA Objective 1 (Health and Wellbeing) because of their proximity to a healthcare centre, open space and public rights of way. Although Woolpit does not have a railway station or secondary school with the village itself, the accessibility to healthcare, primary school, informal recreation, jobs, and bus services and cycleways, means that overall a cumulative significant positive effect on SA Objective 9 (Climate Change Mitigation) is anticipated.

**7.533** Individually Allocation LA097 and Allocation LA120 were considered to have the potential for significant negative effects on SA Objective 13 (Landscape/Townscape) and, given that they both adjoin the A14, this effect could result in a cumulative significant negative effect on this SA Objective, increasing the sense of urbanisation along this strategic transport corridor. In addition, there is the potential for

cumulative significant indirect effects on SA Objective 11 (Biodiversity and Geodiversity). The additional traffic generated by the allocations in Woolpit could lead to a cumulative significant negative effect on SA Objective 6 (Air and Noise) because of the AQMAs in Bury St Edmunds and Great Barton. All the allocations recorded at least three minor negative effects against the four site assessment criteria for SA Objective 5 (Water), meaning there is the potential for cumulative significant negative effects on this SA Objective prior to mitigation.

### Cumulative effects of the policies in the JLP

**7.534** Summaries of the SA scores for each of the JLP policies and proposed site allocations can be found in the following summary tables:

- For the Part 1 Strategic Policies, the SA summary scores can be found in **Table 7.18**.
- For the Part 2 Local Policies, the SA summary scores can be found in **Table 7.19**.
- For the Part 3 Place and Allocations Policies, the SA summary scores can be found in **Table 7.21** plus the SA of Policy LS01 (Hinterland hamlet sites) in **Table 7.20**.

**7.535** The SA of the policies has considered each policy on the basis of the wording of the policy. The purpose of this part of the cumulative effects appraisal is to consider how the policies inter-relate with one another, either to result in effects that are greater than those identified for individual policies, or alternatively for the effects of one or more policies to offset the effects identified for other policies (i.e. mitigation).

**7.536** The anticipated cumulative effects of the JLP policies as a whole are described by SA Objective below.

#### SA Objective 1: To improve the health and wellbeing of the population overall and reduce health inequalities

**7.537** The majority of policies in Part 1 and Part 2 of the JLP will have either significant positive or minor positive effects on SA Objective 1. In terms of direct effects, the JLP aims to deliver the health services and facilities needed to support a growing population and new development. The housing policies seek to supply the numbers and types of housing required to meet housing need, placing great emphasis on the quality of housing, and specific needs, such as for an ageing population, which should all have a positive effect on health.

**7.538** Policies that address environmental protection and open space provision should help to provide conditions that encourage mental and physical wellbeing. Policies that promote sustainable transport modes, such as walking and cycling, should encourage active lifestyles, and therefore improve health.

**7.539** With respect to the site allocations in Part 3 of the JLP, the vast majority are anticipated to have a positive effect on SA Objective 1, and in many instances a significant positive effect, because of their access to GP surgeries, or to open space, sport and recreation facilities, or to Public Rights of Way, or a combination of these. In some instances, site allocation policies require contributions towards healthcare provision.

**7.540** It should be noted that during the construction phase there may be some temporary negative effects to local residents from noise and disturbance, but these will cease once the developments are completed.

**7.541** Overall, it is considered that the JLP will have a **cumulative significant positive effect (++)** on SA Objective 1 (Health and Wellbeing).

#### SA Objective 2: To maintain and improve levels of education and skills in the population overall

**7.542** Only a small number of the JLP Part 1 and Part 2 policies are considered likely to have an effect on SA Objective 2. However, where such effects are identified, they are likely to be positive effects. The most significant effects are associated with policies that seek to provide the community infrastructure and education facilities required to support new development.

**7.543** The spatial strategy in the JP focuses most development on those settlements that are likely to have the greatest range of services and facilities, including education provision. However, with respect to the actual site allocations in Part 3 of the JLP, the picture becomes more mixed. Some sites are well located to schools, particularly primary schools, but quite a large proportion of sites are not within desirable or acceptable walking distance. In some instances, the site allocation policies require financial contributions to education provision (which normally means investment in existing schools), and in a small number of allocations, new schools will be built. But, generally, the situation regarding accessibility will not alter a great deal.

**7.544** Overall, it is considered that the JLP will have **cumulative mixed minor positive and minor negative effects (+/-)** on SA Objective 2 (Education and Skills).

#### SA Objective 3: To reduce poverty and social exclusion and ensure access to jobs and services

**7.545** Around half the policies in Part 1 and Part 2 of the JLP are likely to have a positive effect on SA Objective 3. Only two policies are considered likely to have negative effects, in both cases minor. This is because the spatial strategy in the JLP is to focus development at those settlements that are more likely to have jobs and services, although the Market Towns and

Urban Areas tend to have a greater range than the Core Villages and settlements in the Ipswich Fringe, although the latter are relatively located to Ipswich itself, and the former in some instances can be quite close to Market Towns.

**7.546** There are a number of policies that seek to support and provide for community services and facilities to support development, and a number of policies could have indirect positive effects on the achievement of this SA Objective.

**7.547** With respect to the site allocations in Part 3 of the JLP, a significant proportion are anticipated to result in a positive effect against SA Objective 3, and in some cases this effect could be significant positive. There is nonetheless a sizeable minority of site allocations that score negatively against this SA Objective, although in most cases this is recorded as a minor negative effect. There are, though, policies within the JLP that require contributions to community infrastructure.

**7.548** Overall, it is considered that the JLP will have a **cumulative mixed significant positive and minor negative effect (+ +/-)** on SA Objective 3 (Accessibility).

#### **SA Objective 4: To meet the housing requirements of the whole community**

**7.549** One of the key focal points of the JLP is to provide for the homes identified as being needed in Babergh and Mid Suffolk over the Plan period. A number of policies address this issue directly, both in terms of the number of homes, but also they type of home, including affordable housing, and homes for particular needs, such as the elderly, and gypsies and travellers. Considerable attention is also placed on the quality of housing provision in terms of design and specifications. Although the focus of housing provision is towards the upper end of the settlement hierarchy, there is provision for new homes in smaller settlements too, as well as windfalls, which means that all communities across the Plan area should be able to accommodate new homes if needed, commensurate with the size and role of the settlement concerned.

**7.550** As a result, a number of policies and site allocations in Parts 1, 2 and 3 of the JLP receive positive effects, and in many instances these effects are considered to be significant. On occasion, it is noted that policies that seek to protect the environment, and similar policies, could restrict opportunities to develop housing, but enough site allocations have been identified to deliver the housing needed. Indeed, over 60% off the housing supply requirement in the JLP already has planning consent.

**7.551** Therefore, it is considered that the JLP will have a **cumulative significant positive effect (++)** on SA Objective 4 (Housing).

#### **SA Objective 5: To conserve and enhance water quality and resources**

**7.552** Water resources and water quality are important issues for new development in Babergh and Mid Suffolk, given that this is one of the driest parts of the UK, and that pressure on the water environment is likely to increase as a result of climate change. In addition, Source Protection Zones have been identified where there is a risk of pollution to drinking water supplies from inappropriate development.

**7.553** This is recognised in a number of policies in the JLP that seek to ensure that the water infrastructure is in place to support new development. This applies both to water supply and to waste water treatment, taking into account also the potential effects on internationally designated biodiversity sites. The relevant policies are recorded as likely to have positive effects on SA Objective 5, and in a number of instances these effects are considered to be significant.

**7.554** On other hand, the SA, with reference to the Water Cycle Study where relevant, identified a number of site allocations where there is a risk to the water environment, with respect to Source Protection Zones, Water Resource Zones, Wastewater Treatment capacity, and foul sewerage network capacity.

**7.555** As a result of the research that has been put into this issue through the Water Cycle study and engagement between BMSDC and the water companies and the Environment Agency, the JLP does include the appropriate safeguards. Some of the site allocations include mitigation for some of the matters, but generally reliance is placed on policies in Part 1 and Part 2 of the JLP to cover all areas.

**7.556** It is clear that, as a result of development planned in the JLP, there will be pressure on water resources and wastewater treatment works and supporting infrastructure. Notwithstanding policy safeguards in the JLP, and given the sensitivity of the water environment, it is considered that, in line with the precautionary principle, a residual risk remains. Therefore, a **cumulative minor negative effect (-)** is recorded against SA Objective 5 (Water).

#### **SA Objective 6: To maintain and where possible improve air quality and reduce noise pollution**

**7.557** Without the benefit of traffic modelling, it was not possible to quantify the effects on air quality, and therefore a precautionary approach was taken in the SA.

**7.558** Air pollution is not a major issue in Babergh and Mid Suffolk although an Air Quality Management Area (AQMA) has been declared in Sudbury, and the strategic road network is associated with higher levels of air pollution. However, both neighbouring Bury St Edmunds and Ipswich contain a number of AQMAs and, given the degree of commuting by car to these

two towns by residents of Babergh and Mid Suffolk, it was considered an important factor to take into account in the SA. It is not unusual for people living 25km from Ipswich and Bury St Edmunds to commute, and therefore all site allocations within this distance were considered likely to have a negative effect on the AQMAs, as well as on Sudbury too, and sites within half the distance were considered to have the potential for a significant negative effect. Although, some site allocations are small in terms of the number of dwellings it is the cumulative effect of such journeys that add up to a significant effect. Thus, ten sites of ten dwellings could have a similar effect as one site of 100 dwellings.

**7.559** As a result, a large number of site allocations were identified as having the potential for a significant negative effect on air quality, and several more a minor negative effect.

**7.560** Within Part 1 and Part 2 of the JLP, there is a recognition that air quality is an issue that needs to be taken into account, and a number of policies receive positive effects, some of which are significant. However, the focus is on ensuring that development within an AQMA does not have unacceptable air quality impacts, rather than on the traffic generated from elsewhere in the Plan area contributing to pollution in AQMAs and along the main transport corridors.

**7.561** The JLP does include policies that seek to promote sustainable forms of transport, as well as electric charging points for electric cars, which are less polluting than combustion engines and likely to become more commonplace during the Plan period.

**7.562** Similarly, the main corridors of noise pollution tend to follow the strategic transport corridors, which also form the focus for a considerable amount of development in the site allocations. Some of the site allocation policies include the need to mitigate against the potential effects of noise pollution.

**7.563** Overall, given the number of AQMAs within and in close proximity to Babergh and Mid Suffolk, the importance of such locations for commuting journeys and the reliance on the car for commuting, it is considered that the JLP will have a **cumulative mixed significant negative and minor positive effect (+/--)** on SA Objective 6 (Air and Noise).

#### SA Objective 7: To conserve soil and mineral resources

**7.564** Compared to many local authorities, there are very few brownfield sites available for development in Babergh and Mid Suffolk. However, the site allocations in Part 3 of the JLP do include a small number of sites on previously developed land, and therefore for these sites significant positive effects have been identified.

**7.565** However, the vast majority of site allocations are on greenfield land, and in number of instances these are likely to include potentially best and most versatile agricultural land,

despite policy safeguards in Part 2 of the JLP that seek to avoid development of such agricultural land. For development proposals that do not have site allocations, there is a clear policy requirement that best and most versatile agricultural land should be avoided if possible. In some instances, there is a risk that mineral resources could be sterilised, although this is not as big an issue as the potential loss of high grade agricultural land.

**7.566** Overall, it is considered that the JLP will have a **cumulative mixed significant negative and minor positive effect (+/--)** on SA Objective 6 (Soils and Minerals).

#### SA Objective 8: To promote the sustainable management of waste

**7.567** The promotion of sustainable management of waste was not considered to be of material relevance to site appraisal and allocations.

**7.568** There are several references to the need for suitable waste management practices in policies in Parts 1 and 2 of the JLP, and some of the site allocation policies include a requirement for contributions towards household recycling provision.

**7.569** Overall, it is considered that the JLP will have a **cumulative minor positive effect (+)** on SA Objective 8 (Waste).

#### SA Objective 9: To reduce contribution to climate change

**7.570** Climate change is referenced throughout the JLP and there are several policies in Parts 1 and 2 of the JLP that are considered likely to have a significant positive effect with respect to SA Objective 9, including a strategic policy that is dedicated solely to climate change related matters. The JLP stresses the importance of a low carbon approach to construction and design of development, and it explicitly supports renewable, decentralised and community energy generating proposals, subject to certain criteria being met.

**7.571** The spatial strategy focuses development on those settlements that have the most jobs, services and facilities, as well as public transport, although some of these settlements are better served than others (e.g. Market Towns compared to Core Villages, in general terms). A significant proportion of development will take place in the strategic transport corridors, which may give easier access to rail and bus services, but on the other hand could facilitate car travel.

**7.572** When it comes to the site allocations, the picture is mixed. Given that quite a few of the site allocations are on the edge of settlements, they are not always that well located in terms of walking distance of town centres, services and facilities, and public transport services may not be that

frequent. Nonetheless, considerably more site allocations score positively than negatively against SA Objective 9.

**7.573** Overall, it is considered that the JLP will have **cumulative mixed significant positive and minor negative effects (++/-)** for SA Objective 9 (Climate Change Mitigation).

#### **SA Objective 10: To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change**

**7.574** Not that many of the Part 1 and Part 2 JLP Policies are considered likely to have an effect on SA Objective 10. Most of the ones that do are important, though, as they are likely to result in significant positive effects. The focus of such policies is on ensuring that the infrastructure is provided to support development, particularly with respect to water supply and waste water treatment (both of which could be impacted by climate change). With regard to flood risk, the JLP requires the application of the sequential test and the exception test with respect to flood risk, and that new development in areas at medium or high risk from flooding will not increase flooding elsewhere. It also requires the incorporation of appropriate sustainable drainage systems.

**7.575** A number of site allocations were identified by both the SA and the Strategic Flood Risk Assessment (SFRA) as having the potential for flood risk (using slightly different criteria).

**7.576** A considerable amount of research, through the SFRA, has been undertaken with regard to the potential for sites to experience flooding, and the mitigation required to address such risks. Notwithstanding policy safeguards in the JLP and given the potential impacts of flooding to people and property should it take place, it is considered that, in line with the precautionary principle, a residual risk remains. Therefore, overall a **cumulative minor negative effect (-)** is recorded against SA Objective 10 (Climate Change Adaptation), whilst recognising that on a small proportion of individual sites a significant residual risk could remain.

#### **SA Objective 11: To conserve and enhance biodiversity and geodiversity**

**7.577** The SA considered the effects not only on designated biodiversity sites, but also the potential effects on wider ecological networks including, for example, priority habitats. This is because the wider ecological resource needs to be in a healthy condition for the designated sites to thrive.

**7.578** In this regard, a large proportion of the policies in Parts 1 and 2 of the JLP are considered likely to have a positive effect on SA Objective 11, both directly and indirectly. There is considerable emphasis given to policies that safeguard the internationally protected habitats associated with the Stour

and Orwell Estuaries, as well as other designated habitats. Furthermore, there are very strong policies in both Part 1 and Part 2 of the JLP that seek, through development to avoid damage to designated sites, with an emphasis on restoration and enhancement with the aim of delivering biodiversity net gain.

**7.579** However, the SA has identified that a large number of site allocations have a risk of negative effects on biodiversity, and in around half of the sites, this risk is significant. This is because of their proximity to designated habitats, including locally designated wildlife sites and priority habitats. However, it is acknowledged in the SA that there is considerable uncertainty in these findings. This is because very few of the site allocations overlap designated sites themselves and in many instances the risks are indirect (e.g. from recreation or pollution) or have the potential to be mitigated by avoiding the most ecologically sensitive parts of the site. Furthermore, in line with policies in Parts 1 and 2 of the JLP, there is the potential for biodiversity enhancements to be created and funded through development, although these are not often clearly identified in the site allocation policies themselves. With respect to internationally designated sites, it should be noted that the Habitats Regulations Assessment has concluded that the JLP will not have an adverse effect on the integrity of the internationally designated sites.

**7.580** Given the considerable uncertainty of the potential impacts on biodiversity, the true test will be in the implementation of the policies in Parts 1 and 2 of the JLP when individual site allocations come forward for development. This will need to take into account not only the ecological sensitivities of the allocation site and its environs, but also other pressures placed on the development to fund other priorities, such as affordable homes, community infrastructure, etc.

**7.581** Given the number of site allocations where the potential for a significant negative effect on SA Objective 11 has been identified, it is considered that, in accordance with the precautionary principle, these potential effects should be recognised in the cumulative effects assessment. On the other hand, the very strong policies in Parts 1 and 2 of the JLP also need to be recognised.

**7.582** Therefore, overall, it is considered that the JLP will have **cumulative mixed significant positive and significant negative effects (++/-)** on SA Objective 11 (Biodiversity and Geodiversity), albeit with considerable uncertainty.

#### **SA Objective 12: To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings**

**7.583** Babergh and Mid Suffolk have a rich historic environment that is reflected in very strong policies in Parts 1

and 2 of the JLP. These seek to avoid harm to heritage assets, including their setting, in the first instance and, only where harm cannot be avoided, the use of appropriate mitigation. The JLP also supports proposals that will result in the re-use/ redevelopment of a heritage asset, subject to certain criteria being met, and proposals that contribute to local distinctiveness, or enhance the environmental performance of heritage assets.

**7.584** However, the Heritage Impact Assessment, the findings of which are reflected in the SA, identified a number of site allocations where harm could result to the historic environment, and in some instances significant harm. As a result of the Heritage Impact Assessment, some of the most sensitive sites have been removed from the JLP. Some of the site allocation policies in Part 3 of the JLP include mitigation in response to the findings of the Heritage Impact Assessment. As a result, the majority of allocation sites are now considered to have minor negative effects against SA Objective 12.

**7.585** Overall, it is considered that the JLP will have **cumulative mixed significant positive and minor negative effects (++/-)** on SA Objective 12 (Historic Environment).

#### **SA Objective 13: To conserve and enhance the quality and local distinctiveness of landscapes and townscapes**

**7.586** As with the historic environment, Parts 1 and 2 of the JLP include a number of policies that seek to protect and enhance the landscapes and townscapes of Babergh and Mid Suffolk, recognising that the Plan area contains both nationally important landscapes designated as AONBs, and locally sensitive landscapes and townscapes, characteristic of this part of Suffolk. Specific policy protection is given to the Dedham Vale AONB and the Suffolk Coast and Heaths AONB. More generally, the JLP seeks to ensure that development integrates positively with the existing landscape character, reinforces local distinctiveness and settlement identity.

**7.587** With respect to the site allocations in Part 3 of the JLP, the majority are considered to have a minor negative effect on SA Objective 13, with a few potentially having a significant negative effect, with others either a neutral effect or a positive effect. Some of the site allocation policies provide specific mitigation with respect to landscape/townscape matters.

**7.588** Overall, it is considered that the JLP will have **cumulative mixed significant positive and minor negative effects (++/-)** on SA Objective 13 (Landscape/Townscape).

#### **SA Objective 14: To achieve sustainable levels of prosperity and economic growth throughout the plan area**

**7.589** Policies in Parts 1 and 2 of the JLP aim to protect and where appropriate expand the existing strategic employment

sites, regenerate two strategic sites for new employment uses, and support net additional employment uses along the strategic transport corridors. The JLP also seeks to support proposals for retail and new town centre uses, and the tourist economy, and resist the loss of employment sites.

**7.590** A small number of employment sites are allocated in the JLP, and some of the residential sites include provision for small scale employment uses.

**7.591** The SA found that the JLP performs well against SA Objective 14, with a number of significant positive and minor positive effects. Some of the more environmentally focussed policies may restrict opportunities for economic development but, conversely, they will also help to protect the special qualities of the Plan area that make it attractive for tourism and inward investment. Although the JLP does not promote great changes to the economy, it provides a policy framework that should allow the economy of the Plan area to flourish.

**7.592** Overall, it is considered that the JLP will have a **cumulative significant positive effect (++)** on SA Objective 14 (Economic Growth).

#### **SA Objective 15: To revitalise the District's town centres**

**7.593** Parts 1 and 2 of the JLP include policies that are specifically targeted at the town centres of the Districts. These include not only protection and support for traditional retail uses, but also encouragement of a diverse set of uses, including residential (e.g. 'over the shop') and community, cultural and evening activities.

**7.594** The spatial strategy in the JLP guides a significant proportion of development to the Market Towns, although the majority of residential development will take place at other settlements, in particular in the Ipswich Fringe and Core Villages.

**7.595** With respect to Part 3 of the JLP, the SA criteria for appraising the effects of development on SA Objective 15 were tightly drawn, such that positive effects will occur if development takes place within walking distance of town centres. This is because, the further away from a town centre development occurs, the more likely it is that residents will look elsewhere for their retail and other needs, including out-of-town facilities, local shops, or places with a larger and wider range offer, such as Ipswich.

**7.596** As a result, a large number of site allocations received significant negative effects. The sites with most positive effects, including significant positive effects, were those at the Market Towns or Core Villages with district centres, such as Debenham, but even for some of these settlements, the site allocations sometimes scored negatively due to their distance from the town centre.

**7.597** Overall, it is considered that the JLP will have a **cumulative mixed significant positive and significant negative effect (++)** on SA Objective 15 (Town Centres).

#### **SA Objective 16: To enable efficient patterns of movement and modal shift towards sustainable modes of transport**

**7.598** Achieving a marked shift from reliance on the private car to more sustainable modes of transport, particularly public transport, in rural districts is huge challenge. It is not viable to have the frequent and extensive bus networks of larger cities, and as a result routes tend to be restricted, and services infrequent and often with long travel times. Within Babergh and Mid Suffolk, the rail network is also limited, both in terms of destinations and stations.

**7.599** The most viable and easily achieved switch to more sustainable modes of travel, are through walking and cycling. This means providing homes close to jobs, services and facilities, such as schools, open space, and recreational and health facilities. This is why considerable emphasis was given to these aspects in the SA process.

**7.600** Parts 1 and 2 of the JLP include policies that seek to promote more sustainable modes of transport, and these were considered likely to result in positive effects on SA Objective 15, although only a few policies were considered likely to result in significant positive effects. The spatial strategy is considered likely to significant positive effects, because of its focus on those settlements with more jobs, services and facilities, although these are more limited locally in the Core Villages and Ipswich Fringe than in the Market Towns, and the provision for development in the strategic transport corridors could result in greater car use, notwithstanding the train services along some of these routes, particularly between Ipswich and Bury St Edmunds.

**7.601** When looking at the site allocations in Part 3 of the JLP, very few sites scored significant negative effects. Quite a few are considered likely to have minor negative effects, but these are outweighed by the number of sites considered likely to have positive effects, with quite a few in Mid Suffolk in particular considered likely to have significant positive effects because of their access to sustainable modes of transport.

**7.602** As a result, overall, it is considered that the JLP will have **cumulative mixed significant positive and minor negative effects (++)** for SA Objective 16 (Sustainable Travel).

#### **Cumulative effects with other plans and projects**

**7.603** This section describes the current status of other plans and programmes that may combine with the JLP to give rise to cumulative effects, such as Local Plans of neighbouring authorities and nationally significant infrastructure projects.

#### **Neighbouring authorities' local plans**

**7.604** Development in BMSDC area will not be delivered in isolation from those areas around them. The effect of new development and supporting infrastructure on neighbouring authority areas must therefore be considered as part of the SA. The BMSDC area is bordered by the following local authority areas, for which the below mentioned Local Plan documents are adopted or in preparation.

#### **The North Essex Authorities**

**7.605** Tendring District Council, Colchester Borough Council and Braintree District Council have been working together on the strategic cross boundary issues present in North Essex. As a result, all three Local Plans will share an identical Strategic Section 1 Local Plan when adopted.

**7.606** The submission version of the Strategic Section 1 Plan, which included proposals for three new Garden Communities, was considered through joint Public Examination hearings between 16th January and 9th May 2018. Following this, the Inspector concluded that Section 1 was not sound in its current form. Additional work was subsequently undertaken, with the Public Examination hearings resuming between 14th and 30th January 2020. However, following the hearings, the Inspector concluded that two of three Garden Communities proposed were not deliverable. The North Essex Authorities have just finished consulting on the Proposed Main Modifications to the Strategic Section 1 Plan, which now only includes proposals for one new Garden Community. The overall housing numbers remain unchanged. The outcome of the consultation is awaited.

**7.607** As set out in the Strategic Section 1 Plan, existing settlements will be the principal focus for additional growth across North Essex within the period 2013-2033. Development will be accommodated within or adjacent to settlements according to their scale, sustainability and existing role both within each individual district and, where relevant, across the wider strategic area. The identified total minimum housing supply for each council area over the period 2013-2033 is as follows:

- **Tendring:** 11,000 (550 per annum)
- **Colchester:** 18,400 (920 per annum)
- **Braintree:** 14,320 (716 per annum)

**7.608** A proportion of this housing will be delivered through a new Garden Community at the Tendring/Colchester border, as part of the sustainable strategy for growth.

**7.609** A strong sustainable and diverse economy will also be promoted across North Essex, with each Council pursuing a flexible approach to economic sectors showing growth potential across the plan period.

**Table 7.22: Hectares of B use employment land required**

	Baseline	Higher Growth Scenario
Braintree	20.9	43.4
Colchester	22.0	30.0
Tendring	12.0	20.0
North Essex	54.9	93.3

### Tendring District Council

**7.610** As mentioned previously, Proposed Main Modifications to Section 1 of Tendring District Council's Local Plan have recently been consulted upon, alongside Colchester Borough Council and Braintree District Council. The outcome of the consultation is awaited.

**7.611** Section 2 of Tendring District Council's Local Plan has been prepared by Tendring District Council and unlike Section 1, contains policies and site allocations relating solely to the District. Section 2 was submitted alongside Section 1 of the Publication Draft Local Plan in October 2017. According to Tendring's Local Development Scheme (2019), Section 2 should have gone to Examination in Spring/Summer 2020 but it has been delayed.

**7.612** Tendring District Council's existing Local Plan was adopted in 2007 and covers the period to 2011, but aspects of it are now considered out of date and not in accordance with National Planning Policy. According to Tendring District Council's website, until the new Local Plan is adopted, the planning policy situation is complex in that some elements of the 2007 Local Plan remain in force whilst others do not.

### Colchester Borough Council

**7.613** Proposed Main Modifications to Section 1 of Colchester Borough Council's Local Plan have recently been consulted upon, alongside Tendring District Council and Braintree District Council. The outcome of the consultation is awaited.

**7.614** Section 2 of Colchester Borough Council's Local Plan contains policies and site allocations for meeting the needs of the Borough and was submitted at the same time as Section 1, in October 2017. Colchester's Local Development Scheme is not up to date and it is therefore unclear when Section 2 will go to examination. According to the Council's website, an update will be posted when this information becomes available.

**7.615** Colchester Borough Council's existing Local Plan consists of a Core Strategy (adopted in 2008 and amended in

2014), Site Allocations DPD (2010), Development Policies DPD (2010) and Tiptree Jam Factory DPD (2013).

**7.616** According to the Core Strategy (2014), Colchester Borough Council will promote sustainable development and regeneration to deliver at least 14,200 jobs between 2001 and 2021 and at least 19,000 homes between 2001 and 2023. This growth will be located at the most accessible and sustainable locations. The Borough Council will also encourage economic development and plan for the delivery of at least 14,200 jobs between 2001 and 2021.

### Braintree District Council

**7.617** Proposed Main Modifications to Section 1 of Braintree's Local Plan have recently been consulted upon, alongside Tendring District Council and Colchester Borough Council. The outcome of the consultation is awaited.

**7.618** As with the other North Essex Authorities, Section 2 of Braintree District Council's Local Plan was published in October 2017. According to the Council's Local Development Scheme, examination of Section 2 of the Local Plan is likely to take place in Spring/Summer 2020. This has been delayed, but in August 2020 Inspectors were appointed to examine Section 2 of the Local Plan.

**7.619** Braintree's existing Local Plan consists of a Core Strategy (2011), as well as Supplementary Planning Documents. According to the Core Strategy (2011), Braintree District Council will plan, monitor and manage the delivery of a minimum of 4,637 dwellings between 2009 and 2026. These dwellings will be located within the main towns of Braintree, Witham and Halstead on previously developed and infill sites, as well as mixed use regeneration sites. Employment sites will also be located on mixed use regeneration sites.

### West Suffolk Council

**7.620** Forest Heath District Council and St Edmundsbury Borough Council were replaced by a single District Council on 1 April 2019, called West Suffolk Council. The adopted Local Plans covering the former Forest Heath and St Edmundsbury areas will continue to apply to those parts of West Suffolk Council until a new Local Plan is adopted, which is scheduled for mid-2023. The West Suffolk Local Plan Issues and Options will be consulted on between 13th October and 22nd December 2020.

**7.621** An existing document, the Joint Development Management Policies Document (2015), applies to both former districts and sets out the policy context for which planning decisions should be determined – replacing many of the policies contained within each former local authorities' Local Plan.

### Former Forest Heath District Council area

**7.622** The former Forest Heath District Council area's Core Strategy Development Plan Document 2001-2026 (with housing projected to 2031) was adopted in 2010. The Single Issue Review (SIR) was then published in September 2019 to replace Policy CS7 in the Core Strategy. The SIR was prompted by a High Court challenge, which resulted in the majority of Policy CS7 and elements of CS1, CS13 and paragraph 3.12.2 being revoked from the adopted Core Strategy. A Site Allocations Local Plan (2019) also forms part of the Local Plan and sets out site allocations within the former District.

**7.623** Amended Policy CS7 makes provision for at least 6,800 new dwellings to be delivered in the period 2011-2031. With regard to employment, the Site Allocations Local Plan document designates five sites for employment use, which equates to around 23.6 hectares of new employment land.

### Former St Edmundsbury Borough Council

**7.624** The former St Edmundsbury Borough Council area's Core Strategy was adopted in 2010 and makes provision for at least 9,000 new homes between 2008 and 2031. With regard to employment, the Core Strategy states that provision will be made for at least 13,000 additional jobs in the Borough by 2026: employment land east of Suffolk Business Park, Bury St Edmunds (68.28 hectares) and Hanchett End at Haverhill (12 hectares).

### Breckland District Council

**7.625** The Breckland Local Plan was adopted in November 2019. In order to meet future housing needs, the Local Plan seeks to provide no less than 15,289 new homes between 2011 and 2036, at an average of 612 dwellings per annum. With regard to economic development, 64 hectares of employment land will be allocated for the period 2011-2036.

### South Norfolk Council

**7.626** South Norfolk Council worked with Broadland District Council, Norwich City Council and Norfolk County Council as part of the Greater Norwich Development Partnership to produce a Joint Core Strategy. The Joint Core Strategy was adopted in March 2011, with amendments relating to housing growth in Broadland adopted in January 2014. It sets out the overarching strategy for growth across the three districts to 2026 and identifies key locations for housing and employment growth to ensure that future development is sustainable. According to the Joint Core Strategy, at least 36,820 new homes will be built between 2008 and 2026, in addition to 27,000 new jobs created.

**7.627** A Site Specific Allocations and Policies Document (2015) and Development Management Policies Document

(2015) also form part of South Norfolk's Local Plan. Guided by the Joint Core Strategy, the Site Specific Allocations and Policies Document designates areas of land to deliver housing, employment, recreation, open spaces and community uses. The Development Management Policies Document is used to assess planning applications and guide development proposals.

**7.628** South Norfolk Council is currently working with Broadland District Council and Norwich City Council together with Norfolk County Council to develop the Greater Norwich Local Plan. The Draft Strategy and Sites Plan was consulted on between 19th January and 16th March 2020. It comprised a Draft Strategy and Sites Plan, with details on the preferred sites. According to the Draft Strategy, provision will be made for around 44,500 new homes and 33,000 new jobs. The GNDP anticipates the publication of the final version of the Local Plan in 2021, and its adoption in 2022.

### East Suffolk Council

#### Suffolk Coastal Local Plan

**7.629** Suffolk Coastal District Council and Waveney District Council were replaced by a single District Council on 1st April 2019 called East Suffolk Council.

**7.630** The East Suffolk Council Suffolk Coastal Local Plan was adopted on 23 September 2020 and covers the period 2018-2036. It applies to the part of East Suffolk formerly covered by Suffolk Coastal District. According to the Plan, 9,756 new homes will be provided over the lifetime of the Plan, which equates to 542 new homes per year. This will partly be achieved through the delivery of new Garden Neighbourhoods at North Felixstowe and South Saxmundham. The Plan also makes provision for 11.7ha of employment land and the delivery of at least 6,500 new jobs.

#### Waveney Local Plan

**7.631** The Waveney Local Plan was adopted in March 2019 and applies to the part of East Suffolk formerly covered by the Waveney local planning authority area. The Local Plan makes provision for the delivery of 8,223 dwellings in Waveney (374 per year) over the period 2014-2036. The Local Plan also seeks to maximise economic growth through the creation of 5,000 additional jobs in Waveney and makes provision for 43 hectares of employment land. The focus of growth will be on Lowestoft and to a lesser extent Beccles.

### Ipswich Borough Council

**7.632** On 10 June 2020, Ipswich Borough Council submitted the Ipswich Local Plan Review 2018-2036 to the Secretary of State for Examination. The Local Plan Review comprises the Core Strategy and Policies Development Plan Document

Review, in addition to a Site Allocations and Policies Development Plan Document.

**7.633** According to the Core Strategy and Policies Development Plan Document Review, 35,334 new homes will be provided across the Ipswich Housing Market Area. Indeed, the Ipswich Garden Suburb development will contribute significantly to meeting the housing needs of the Borough throughout the plan period.

**7.634** Sites are identified through the Site Allocations and Policies Development Plan Document in accordance with the spatial strategy in the Core Strategy and Policies Development Plan Document Review, in addition to the land allocated at the Ipswich Garden Suburb and the northern end of Humber Doucy Lane. 700 dwellings are expected to be delivered on small windfall sites between 2022 and 2036 at a rate of 50 per year. The housing land supply for the plan period (2018-2036) will consist of:

- **Ipswich Garden Suburb (3,500 minus 232 completions expected late 2036):** 3,268
- **Northern end of Humber Doucy Lane allocated through Policy ISPA4 (Ipswich Strategic Planning Area 4):** 496
- **Site Allocations through Policy SP2 (Land Allocated for Housing) of the Site Allocations Plan:** 2,750
- **Windfall sites (2022-2036):** 700 (50 per annum).

**7.635** With regard to employment, Ipswich Borough Council will encourage the provision of approximately 9,500 jobs in the Borough between 2018 and 2036 by allocating a range and choice of sites amounting to at least 23.2ha of land for employment development (in use classes B1, B2 and B8). The Council will also protect existing employment land for employment use.

## Suffolk County Council

### Minerals and Waste Local Plan

**7.636** The Suffolk Minerals & Waste Local Plan (SMWLP) was adopted in July 2020.

**7.637** The SMWLP allocates nine sites for the extraction of sand and gravel sufficient to supply 9.300Mt over the Plan period to the end of 2036. The Plan also states that the County Council will seek to maintain a landbank of permitted reserves of at least 7 years based upon the average of the last ten years' sales.

**7.638** Although there are significant quantities of Local Authority Collected Waste, Commercial & Industrial Waste, Construction, Demolition & Excavation Waste, and Hazardous Waste managed within Suffolk, the Suffolk Waste Study

concluded that there is no immediate shortfall in waste management capacity for these waste streams. Therefore, the SMWLP states that applications for new facilities would be considered in the normal way.

### Local Transport Plan

**7.639** Suffolk Local Transport Plan covers the period 2011 to 2031. It is in two parts:

- Part 1: Strategy.
- Part 2: Implementation Plan.

**7.640** Within the plan period, the County Council hopes to see the delivery of a number of strategic transport improvements including:

- Dualling of the A11 between Barton Mills and Thetford
- The Ipswich major scheme, 'Ipswich - Transport fit for the 21st Century'
- The Beccles rail loop allowing increased frequency of trains between Ipswich and Lowestoft
- The Beccles southern relief road
- The Lowestoft northern spine road to help remove through traffic from the town
- Ipswich rail chord to improve freight connections from Felixstowe
- Copdock A14/A12 junction improvements

### Neighbourhood Development Plans

**7.641** Neighbourhood Development Plans (NDPs), once adopted, form part of the development plan for a local authority area.

**7.642** There are 13 'made' (adopted) Neighbourhood Development Plans (NDPs) within BMSDC. These are as follows:

- **Aldham Neighbourhood Plan 2018-2036 (2020):** Provision has been made for around 15 dwellings and Pump Green, The Street, has been designated as a Local Green Space. The Neighbourhood Plan also contains a policy on recreational disturbance mitigation, to avoid adverse in-combination recreational disturbance effects on European sites,
- **East Bergholt Neighbourhood Plan 2015-2030 (2016):** A minimum of 86 new homes will be developed in East Bergholt, within or immediately adjacent to the village Built Up Area Boundaries. The Plan seeks to establish a Community Land Trust as a means of delivering homes, including affordable homes, with up to one third of new homes being designed to meet the needs of older

people. Fourteen Local Green Spaces have also been designated.

- **Elmsett Neighbourhood Plan 2017-2036 (2019):** This Neighbourhood Plan provides for around 60 dwellings, all of which should achieve appropriate internal space standards. Seven Local Green Spaces have been designated and five community facilities/services have been protected. The Plan also protects important identified views that must not be adversely affected by development. Additional detail is provided on the design of development within the area in Policy EMST12.
- **Fressingfield Neighbourhood Plan 2018-2036 (2020):** The Plan provides for around 60 dwellings, which will be met through the allocation of the following sites for development, in addition to windfall sites. The Plan also contains nine designated Local Green Spaces and lists 12 non-designated heritage assets.
  - Land at Red House Farm – approximately 28 dwellings.
  - Land West of School Lane – approximately 18 dwellings.
- **Lavenham Neighbourhood Plan (2016):** This Neighbourhood Plan states that residential development proposals will be permitted subject to them being located within or adjacent to the built-up area of Lavenham, and that development must respect views in and out of the village. A change of use to the existing school site to meet local retirement and care home needs will be supported, and a number of open spaces and recreation areas have been safeguarded. The Retail Core Area will also be protected and enhanced.
- **Lawshall Neighbourhood Plan 2016-2036 (2017):** Within the Built Up Area Boundaries there is a general presumption in favour of residential development in the form of single dwellings and small groups of up to five dwellings. Proposals outside of the Built Up Area Boundaries will be permitted where they adjoin the Boundary, or one dwelling (or a pair of semi-detached dwellings) where they adjoin the existing highway. Recreation and green spaces are safeguarded from development unless very special circumstances can be demonstrated. The Plan contains a couple of policies which seek to protect and enhance biodiversity assets within the area.
- **Botesdale & Rickinghall Neighbourhood Plan 2017-2036 (2020):** The Neighbourhood Plan provides for a minimum of 200 dwellings to be developed up to 2036. It also safeguards 27 Local Green Spaces from development unless very special circumstances can be

demonstrated. The Neighbourhood Plan contains details on the design of development.

- **Debenham Neighbourhood Plan 2016-2036 (2019):** This Neighbourhood Plan estimates that around 316 new dwellings can be developed in Debenham at the following sites (and an anticipated windfall allowance of 54 dwellings):
  - Land north of Ipswich Road (60-140 dwellings).
  - Land south of Low Road (15-35 dwellings).
  - Land east of Aspall Road (37-87 dwellings).Additionally, 14 Local Green Spaces have been safeguarded from development unless it can be demonstrated that very special circumstances exist.
- **Haughley Parish Neighbourhood Plan 2016-2036 (2019):** Three sites have been identified for residential development, specifically:
  - Land east of King George V Playing Field (98 new homes).
  - Land at Station Road, east of Millfields (18-31 new homes).
  - Land west of Fishponds Way (25-50 new homes).Commercial and industrial developments will also be supported within the Neighbourhood Plan area, where they are situated on brownfield sites. Details are also provided on the design of new development, in addition to the conservation and enhancement of biodiversity.
- **Mendlesham Neighbourhood Plan 2016-2031 (2016):** A minimum of 75 new homes will be provided up to 2031. Any significant increase on this figure will need to demonstrate clearly that existing local services infrastructure will be able to cope or, if not, that appropriate measures will be provided as part of development proposals. The Neighbourhood Plan requires development to include a suitable contribution of, or contribution towards, functional green areas for recreational purposes.
- **Stradbroke Neighbourhood Plan 2016-2036 (2019):** This Neighbourhood Plan provides for a minimum of 219 dwellings to be built in the period 2016 to 2036 and the following sites are allocated for development:
  - Land north of Laxfield Road (32-45 dwellings).
  - Land east of Farriers Close (25-35 dwellings).
  - Land south of New Street (43-60 dwellings).
  - Land south of Mill Lane (approximately 75 dwellings).

- Land at Grove Farm (44 dwellings).

The Neighbourhood Plan also sets out detailed design principles and encourages the use of Sustainable Drainage Systems (SuDS). The expansion of education and health capacity within the village is also promoted.

- **Stowupland Neighbourhood Development Plan 2016-2036 (2019):** This Neighbourhood Plan provides for at least 203 new homes by 2036. Within the settlement boundaries for Stowupland and Saxham Street, there is a general presumption in favour of residential development in the form of infill and redevelopment sites, and small groups of approximately 10 dwellings. Proposals for development on sites of one hectare or more on the best and most versatile agricultural land will not be supported, unless it cannot be demonstrated that land of a poorer quality is not available. Green and blue infrastructure will be protected and strengthened.
- **Thurston Neighbourhood Development Plan 2018-2036 (2019):** New development in Thurston Parish shall be focused within the settlement boundary of Thurston Village. All housing proposals of five or more units must reflect Thurston's needs across all tenures, including the needs of older people. A number of Local Green Spaces have been safeguarded and provision has been made for wildlife in new developments.

**7.643** There are 40 Neighbourhood Development Plans in progress within BMSDC:

- Hitcham NDP (area designated January 2020)
- Assington NDP (Reg 16 Submission consultation 24 Aug to 16 Oct 2020)
- Bentley NDP (Reg 14 Pre-submission consultation 1 Oct to 16 Nov 2020)
- Boxford NDP (area designated August 2018)
- Capel St Mary (Reg 14 Pre-submission consultation closed on 18 Apr 2020)
- Chelmondiston (Reg 14 Pre-submission consultation closed on 1 Sept 2020)
- Chilton (area designated December 2017)
- Copdock & Washbrook (Reg 14 Pre-submission consultation closed on 13 Apr 2020)
- East Bergholt (Proposed Modification)
- Glemsford (area designated October 2017)
- Great Waldingfield (area designated July 2017)
- Hadleigh (area designated June 2015)
- Hartest (second Pre-Submission consultation Spring 2018)
- Holbrook (area designated April 2018)
- Leavenheath (area designated May 2019)
- Little Cornard (area designated August 2018)
- Little Waldingfield (Reg 14 Pre-submission consultation closed on 24 July 2020)
- Long Melford (Reg 14 Pre-submission consultation Jan - Feb 2019)
- Newton (Reg 14 Pre-submission consultation 5 Aug to 7 Oct 2020)
- Stoke by Nayland (area designated December 2017)
- Stutton (area designated October 2018)
- Whatfield (Reg 14 Pre-submission consultation 5 Aug to 7 Oct 2020)
- Woolverstone (area designated October 2018)
- Eye (update on Referendum etc. published 7 May 2020)
- Drinkstone (update on Referendum etc. published 17 June 2020)
- Woolpit (Final Exam Report dated 3 Aug 2020)
- Wilby (Reg 16 Submission consultation 12 Aug to 7 Oct 2020)
- Needham Market (Reg 14 Pre-sub' consultation closed on 10 Mar 2020)
- Ashbocking (area designated November 2019)
- Battisford (area designated December 2018)
- Beyton (area designated March 2019)
- Diss & District (area designated August 2017)
- Elmswell (area designated January 2014)
- Hoxne (area designated August 2019)
- Laxfield (Reg 16 Submission consultation 17 Aug to 12 Oct 2020)
- Mendlesham (Proposed Modification)
- Redgrave (Reg 14 Pre-submission consultation 14 Sept to 8 Nov 2020)
- Thorndon (Final Exam Report dated 21 Sept 2020)
- Walsham le Willows (area designated July 2018)
- Wherstead (area designated September 2020)
- Sproughton (area designated April 2020)

- Old Newton & Dagworth with Gipping NDP (area designated February 2020).

### Nationally Significant Infrastructure Projects

**7.644** Development in BMSDC could have an effect on Nationally Significant Infrastructure Projects (NSIPs). NSIPs within and outside of BMSDC that may affect or be affected by development are set out below.

#### Progress Power

**7.645** A rapid response gas-fired power plant referred to as Progress Power, was granted planning permission on 23 July 2015 by the Secretary of State for Energy and Climate Change. The power station will be located in the north of BMSDC, 1km north west of the village of Eye, 4km south of the town of Diss and adjacent to the A140, which links Ipswich to Norwich.

**7.646** The power station site covers an area of approximately 10ha and is located within the Eye Airfield business and industrial estates. There will be one stack (chimney) at the power station, up to 35 metres in height. A plume consisting mainly of water vapour may be visible from the stack under certain environmental conditions but the emissions will be limited by the Environment Agency as part of an operational Environmental Permit.

**7.647** The noise produced during the power station's operation will be limited by both the Development Consent Order issued by the Secretary of State and limits set by the Environment Agency as part of the operational Environmental Permit. The combustion of natural gas in a power station does not produce any noticeable odour.

**7.648** There will be HGV traffic during the construction phase, but it would be routed to minimise congestion, noise and dirt away from Eye, Mellis and Yaxley, and other places. Once operational, there will be a negligible increase in traffic movements.

#### Sizewell C

**7.649** Sizewell C is a proposed nuclear power station on the Suffolk Coast in the East Suffolk Council area, which neighbours BMSDC. The application for this Nationally Significant Infrastructure Project was accepted for examination on 24th June 2020.

### Cumulative effects assessment with other plans and projects

**7.650** The development proposals in the plans and projects described above have the potential to combine with the development proposals in the Babergh Mid Suffolk JLP. These relate mainly to the Local Plans of neighbouring authorities.

**7.651** With respect to Neighbourhood Development Plans, these are prepared within the context of the JLP, which both reflects the content of the adopted Neighbourhood Development Plans and provides the framework for new development in new Neighbourhood Plans as they come forward. Most also deal with small scale development at the local level. It is therefore unlikely that there will be significant cumulative effects arising with the JLP from Neighbourhood Development Plans.

**7.652** The key potential cumulative effects with other plans and projects are described by SA Objective below.

#### SA Objective 1: To improve the health and wellbeing of the population overall and reduce health inequalities

**7.653** Most influences on the health and wellbeing of the population are quite localised and will therefore, for residents of Babergh and Mid Suffolk be influenced by the JLP rather than other plans and programmes.

**7.654** There is the potential for positive health effects from employment arising from economic development proposals in neighbouring authorities, in particular St Edmundsbury and Ipswich, as well access to community recreation and facilities supported by plans in neighbouring authorities.

**7.655** There could be cumulative effects arising from two transport schemes in the Local Transport Plan, being 'Ipswich - Transport fit for the 21st Century' and the Copdock A14/A12 junction improvements. These could have both positive and negative cumulative effects. For example, the former could encourage the use of more sustainable modes of transport, including walking and cycling, whereas the latter will ease traffic congestion and hence pollution but could facilitate greater traffic movement overall.

**7.656** There could be disturbance and noise from construction of the Progress Power gas-fired power plant north west of Eye, including HGV movements, which could combine with development proposed in the JLP to create some localised cumulative effects on SA Objective 1 in this part of the JLP area.

**7.657** Overall, it is considered that the JLP with other plans and projects will result in **cumulative mixed minor positive and minor negative effects (+/-)** on SA Objective 1 (Health and Wellbeing).

#### SA Objective 2: To maintain and improve levels of education and skills in the population overall

**7.658** It is unlikely that there will be significant cumulative effects arising on SA Objective 2 with other plans and projects, as education is provided at the local level

**7.659** However, the increase in residents could provide additional demand for further education facilities in Ipswich.

**7.660** Overall, it is considered that the JLP with other plans and projects will result in a **cumulative minor positive effect (+)** on SA Objective 2 (Education and Skills).

#### **SA Objective 3: To reduce poverty and social exclusion and ensure access to jobs and services**

**7.661** The JLP provides for the jobs, services and facilities arising from development proposed within the JLP within the Plan area. However, the economic development proposals in neighbouring authorities, most notably in Ipswich and West Suffolk, could create job opportunities for residents of Babergh and Mid Suffolk. This is particularly so for those settlements in the Ipswich Policy Area.

**7.662** Similarly, the services and facilities being promoted through Local Plans in neighbouring authorities could give greater access to residents of Babergh and Mid Suffolk, again particularly in the Ipswich Policy Area.

**7.663** As a result, there could be a **cumulative significant positive effect (++)** on SA Objective 3 (Accessibility).

#### **SA Objective 4: To meet the housing requirements of the whole community**

**7.664** All of the neighbouring authorities' Local Plans aim to meet their identified housing needs. It is recognised that there are close links between the authorities, particularly Ipswich, and the plans combine to meet the required number, subject to examination outcomes.

**7.665** As a result, it is considered that the JLP will have a **cumulative significant positive effect (++)** with other Local Plans on SA Objective 4 (Housing).

#### **SA Objective 5: To conserve and enhance water quality and resources**

**7.666** There is a considerable amount of development planned throughout the sub-region in all Local Plans. As described earlier on in this SA Report, there are already stresses on the water supply and wastewater treatment infrastructure, which is likely to become ever more acute with climate change.

**7.667** However, this is a recognised issue that is continuously being investigated by the local authorities, the relevant water companies, Ofwat and the Environment Agency, through regulatory procedures. The primary purpose of these discussions is to ensure that the water supply and treatment infrastructure and water resources are available and in place to serve new development. There will nonetheless be a residual risk, particularly at times of drought.

**7.668** Overall, it is considered that there is a **cumulative negative effect (-)** of the JLP combining with other plans and projects on SA Objective 5 (Water).

#### **SA Objective 6: To maintain and where possible improve air quality and reduce noise pollution**

**7.669** It has already been noted in this SA Report that Air Quality Management Areas (AQMA) have been declared in and close to Bury St Edmunds and in Ipswich, as well as in Sudbury. Although the various Local Plans and the Local Transport Plan promote sustainable modes of travel, it is highly likely that traffic volumes will increase as a result of the development planned in all the other Local Plans in combination. This could result in increased air pollution, although car engines are becoming less polluting over time.

**7.670** Similarly, the main corridors of noise pollution tend to follow the strategic transport corridors, which also form the focus for a considerable amount of development both in the JLP and neighbouring authorities.

**7.671** Overall, given the number of AQMAs within the JLP area and in neighbouring authorities, it is considered that the JLP will have a **cumulative mixed significant negative and minor positive effect (+/-)** with other plans and projects on SA Objective 6 (Air and Noise).

#### **SA Objective 7: To conserve soil and mineral resources**

**7.672** Development arising as a result of the JLP will have no effect on the soil and mineral resources of neighbouring authorities. However, the Local Plans in these authorities also provide for a significant amount of development on greenfield land, some of which may be best and most versatile agricultural land. However, there is also an emphasis on the use of brownfield land, particularly within the urban areas such as Ipswich, and on sites suitable for regeneration.

**7.673** Overall, it is considered that the JLP will have a **cumulative mixed minor positive and minor negative effect (+/-)** with other plans and projects on SA Objective 6 (Soils and Minerals).

#### **SA Objective 8: To promote the sustainable management of waste**

**7.674** The Suffolk Waste Study concluded that there is no immediate shortfall in waste management capacity and therefore the Suffolk Minerals and Waste Local Plan states that applications for new facilities would be considered in the normal way.

**7.675** Overall, it is considered that the JLP will have a **cumulative negligible effect (0)** on SA Objective 8 (Waste) with other plans and projects.

#### SA Objective 9: To reduce contribution to climate change

**7.676** There is little doubt that the amount of development proposed by the JLP and by neighbouring authorities' Local Plans will increase carbon emissions, both through the construction process and use of materials, and also when operational (e.g. for heating and lighting) as well as through traffic generation.

**7.677** However, all local authorities in their Local Plans recognise the need to address carbon emissions and therefore promote energy efficiency in these areas, as well as a switch to renewable energy sources.

**7.678** As a result, carbon emission from development planned are likely to be less than would otherwise be the case.

**7.679** Overall, it is considered that the JLP will have **cumulative mixed significant positive and minor negative (++/-)** effects for SA Objective 9 (Climate Change Mitigation) with other plans and projects.

#### SA Objective 10: To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change

**7.680** Apart from water resources, which are addressed through SA Objective 5 (Water), the main impact on climate change at the strategic level insofar as is relevant to Local Plans, is changes to flood risk. Extreme rainfall events could lead to fluvial flooding from rivers overtopping their banks and/or defences, or from surface water flooding where the drainage systems cannot cope.

**7.681** Most of these issues are localised within the plan areas themselves, although there is the risk that development upstream could increase the risk of flooding downstream, which could be a neighbouring authority. However, Local Plan policies, including in the JLP, aim to prevent this from happening.

**7.682** Nonetheless, in line with the precautionary principle, a residual risk remains. Therefore, overall a **cumulative minor negative effect (-)** is recorded against SA Objective 10 (Climate Change Adaptation).

#### SA Objective 11: To conserve and enhance biodiversity and geodiversity

**7.683** Ecological networks cross local authority boundaries, and therefore a strategic approach is often required to ensuring that biodiversity is safeguarded and where possible enhanced. This is the approach taken to the protection of the integrity of the internationally designated habitats of the Stour and Orwell Estuaries, for which a Protected Habitats Sites Mitigation Zone has been defined and a Recreational

disturbance and Avoidance Mitigation Strategy (RAMS) is being prepared in consultation with Natural England.

**7.684** More generally, the NPPF requires the planning system to deliver net biodiversity gain, and therefore this approach should apply to all Local Plans and sets out how the hierarchy of designated biodiversity sites should be protected as well as wider ecological networks including priority habitats.

**7.685** Nonetheless, there is a considerable amount of development proposed in the JLP and neighbouring authorities' Local Plans that will place pressure on biodiversity. The policy safeguards are in place, but the test will be whether these lead to the maintenance and enhancement of biodiversity over time.

**7.686** Therefore, overall, it is not possible to conclude whether the cumulative effects of the JLP and other plans and projects on biodiversity will be positive or negative, nor how significant they will be. As a result, **cumulative uncertain effects (?)** on SA Objective 11 (Biodiversity and Geodiversity) are recorded.

#### SA Objective 12: To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings

**7.687** Whilst Suffolk and neighbouring Essex and Norfolk have considerable historic environment interest, most effects of the JLP and neighbouring authorities' Local Plans are likely to be localised, within the environs and setting of the heritage assets concerned.

**7.688** As a result, the effects on the historic environment are addressed through the SAs of each individual Local Plan. With respect to the interaction of effects between Babergh and Mid Suffolk, these are most likely to occur where local authority boundaries meet, for example on the edge of Ipswich and where Sudbury/Great Cornard abut Braintree District. Overall, it is considered that **cumulative minor negative effects (-)** on SA Objective 12 (Historic Environment) will arise from where the JLP interacts with other Local Plans, taking into account the mitigation provided in the relevant Local Plans.

#### SA Objective 13: To conserve and enhance the quality and local distinctiveness of landscapes and townscapes

**7.689** As with the historic environment, most effects of the JLP and neighbouring authorities' Local Plans on landscape and townscape are likely to be localised, within the Local Plan areas themselves. It is noted that the Dedham Vale AONB and the Suffolk Coast and Heaths AONB cross local authority boundaries, but all Local Plans seek to ensure that they are protected from significant adverse effects. Similarly, neighbouring authorities' Local plans include policies to protect and enhance landscape and townscapes.

**7.690** Nonetheless, there will be a considerable amount of development in-combination, which will serve to make not only Babergh and Mid Suffolk, but also neighbouring authorities feel more urbanised, and countryside will be lost to development. On the other hand, neighbouring local authorities' Local Plans prioritise, where possible, the re-use and regeneration of brownfield sites, which could serve to improve overall townscape attributes and qualities

**7.691** Overall, it is considered that the JLP will have **cumulative mixed minor positive and minor negative effects (+/-)** on SA Objective 13 (Landscape/Townscape) in-combination with other plans and projects.

#### **SA Objective 14: To achieve sustainable levels of prosperity and economic growth throughout the plan area**

**7.692** The JLP and neighbouring authorities' Local Plans seek to provide the planning framework to support their local economies and create jobs. Each seeks to meet its identified employment land needs. Aspects of the economies straddle local authority boundaries, for example with respect to commuting patterns and supply chains. Individual regeneration schemes, for example in Ipswich, should help to support neighbouring Babergh and Mid Suffolk's local economy. Similarly, individual projects, such as the Ipswich rail chord to improve freight connections from Felixstowe, the Progress Power gas-fired power plant, and Sizewell C should create jobs that will benefit residents of Babergh and Mid Suffolk.

**7.693** Overall, it is considered that the JLP will have a **cumulative significant positive effect (++)** on SA Objective 14 (Economic Growth), in combination with other plans and projects.

#### **SA Objective 15: To revitalise the District's town centres**

**7.694** This SA Objective focuses primarily on the town centres within Babergh and Mid Suffolk. Most of these town centres are some distance from other local authorities, although a few, such as Sudbury and Eye are relatively close. It is unlikely that the Market Towns of Babergh and Mid Suffolk play a significant role for residents in neighbouring authorities insofar as their town centre shops, services and facilities are concerned. Ipswich and Bury St Edmunds, for example, are much larger settlements that have a considerable range of shops, services and facilities themselves. The main exception is Sudbury, which helps to serve the surrounding rural communities stretching into Braintree District.

**7.695** Although each Local Plan aims to provide support and improvements to their own town centre offers, it is not

considered likely that this will impact significantly on the Market Towns of Babergh and Mid Suffolk.

**7.696** Therefore, overall, it is considered that the JLP will have a **cumulative negligible (0)** effect on SA Objective 15 (Town Centres) in combination with other plans and projects.

#### **SA Objective 16: To enable efficient patterns of movement and modal shift towards sustainable modes of transport**

**7.697** Some of the neighbouring authorities share similar characteristics to Babergh and Mid Suffolk with respect to travel movements and the use of sustainable modes of transport. They are predominantly rural, insofar as the areas located close to the JLP area are concerned. The main exception is Ipswich, which is well served by both rail and bus. Commuting patterns alone suggest that there is considerable movement across local authority boundaries.

**7.698** Nonetheless, all Local Plans and the Local Transport Plan seek to encourage the use of more sustainable modes of transport, although this will be difficult to achieve in significant volumes in the more rural areas. At the same time, several of the transport schemes in the Local Transport Plan will result in improvements to the road network, which could facilitate travel by private vehicle. However, the 'Ipswich - Transport Fit for the 21st Century' programme does prioritise the use of public transport, cycling and walking rather than road building. However, this will be of most benefit to residents of Ipswich.

**7.699** Overall, it is considered that the JLP will have **cumulative mixed minor positive and minor negative effects (+/)** for SA Objective 16 (Sustainable Travel) in combination with other plans and projects.

### **Habitats Regulations Assessment**

**7.700** A Habitats Regulations Assessment (HRA)<sup>58</sup> has been undertaken by Place Services on behalf of BMSDC, in accordance with Regulation 63 of The Conservation of Habitats and Species Regulations 2017 (as amended).

**7.701** The purpose of the HRA is to determine whether the JLP either alone or in-combination with other plans and projects would have an adverse effect on the integrity of an internationally designated biodiversity site (referred to as 'Habitats Sites' in the HRA).

**7.702** The Habitats Sites considered within this HRA were:

- Stour and Orwell Estuaries Special Protection Area (SPA).
- Stour and Orwell Estuaries Ramsar site.

<sup>58</sup> Place Services (October 2020) Babergh and Mid Suffolk Joint Local Plan - Preferred Options (Reg 19): Habitats Regulations Assessment

- Deben Estuary SPA.
- Deben Estuary Ramsar site.
- Minsmere – Walberswick SPA.
- Minsmere – Walberswick Ramsar site.
- Minsmere to Walberswick Heaths & Marshes Special area of Conservation (SAC).
- Redgrave and South Lopham Fens Ramsar site.
- Waveney & Lt Ouse Valley Fens SAC.

**7.703** Potential impact pathways between the above Habitats Sites and the Joint Local Plan were identified, considered and assessed. These related to water quality, air quality, disturbance and loss of functionally linked land (land outside an SPA and/ or Ramsar site). As a result, likely significant effects on Habitats Sites could not be ruled out in the screening process and an Appropriate Assessment was undertaken.

**7.704** The Appropriate Assessment recommended a number of wording amendments to the JLP. These included the following types of changes:

- Policy wording changes.
- Amendments to the supporting text for policies.
- Strategic mitigation (e.g. Suffolk Coast RAMS) for residential allocation policies for sites within the 13km Zone of Influence as well as site based mitigation.
- Monitoring for potential air quality impacts for roads within 200m of a Habitats Site.
- The need for project level HRAs at application stage (e.g. to cover construction impacts and good practice in relation to run off, air quality during construction, on site silt management etc.) to secure a Construction Environmental Management Plan (CEMP - Biodiversity) as a condition of any consent issued.

**7.705** The recommendations from the Appropriate Assessment were considered to be precautionary, to ensure that the JLP identifies clear mitigation needs and protects the Habitats Sites from any project level impacts.

**7.706** The HRA found that, where policies do not identify specific locations, set a fixed level of development or the potential for significant effects relates to the possibility of development coming forward in a particular location or with particular characteristics is likely, the risks may be simply avoided with straightforward clarifications, which remove any uncertainty.

**7.707** The recommendations to amend or add text to the policy included an explanation of how the policy should be

implemented to prevent adverse effects on site integrity. This did not exclude the need for project level HRA but enabled a conclusion of no adverse effects on integrity at the Plan level, because the identified risks to Habitats Sites were removed. The HRA stated that project level HRA provides a means of checking for any further risks unforeseen at the Plan level, and for developing project specific mitigation measures in greater detail within a project level AA.

**7.708** The HRA concluded that, on the basis of the JLP reflecting the recommendations of the HRA, the JLP is not predicted to have any adverse effect on integrity of any Habitats Sites, either alone or in combination with other plans and projects.

## Recommendations

**7.709** During the course of the SA work, a number of recommendations for changes to a working draft of the JLP were provided to BMSDC. These are listed in **Table 7.23** below, together with the response of BMSDC.

Table 7.23: Recommendations arising from the SA and BMSDC response

Joint Local Plan Policy	LUC Recommendation	BMSDC Response
SP01 – Housing Needs	None	Not applicable
SP02 – Affordable Housing	None	Not applicable
SP03 – Settlement Hierarchy	None	Not applicable
SP04 – Housing Spatial Distribution	None	Not applicable
SP06 – Employment Housing	For new employment sites, encouragement could be given in Policy SP05 to the for prioritisation of the development of brownfield sites over greenfield sites, and to avoid the loss of best and most versatile agricultural land.	For new employment sites (SP05 [3]) additional criteria has been added to prioritise brownfield and PDL.
	In addition, Policy SP05 could specifically state that access to public transport, and the facilitation of walking and cycling, should be considerations in the determination of the suitability of new employment sites along the strategic road network.	For new employment sites (SP05 [3]) additional criteria has been added to prioritise brownfield and PDL.
	Also, with respect to new employment sites on the strategic road networks, reference is made in clause b to the design and layout sensitive to its surroundings, including any landscape or heritage assets. Biodiversity could be added to this list.	For new employment sites (SP05 [3]) additional criteria has been added to prioritise brownfield and PDL.
	It is recommended that additional policy guidance is given for the appropriate development of the two regeneration sites, particularly the brownfield site at Brantham, which is on the coast adjacent to the Suffolk Coast and Heaths AONB, for example in relation to landscape, biodiversity, and potentially flood risk and the historic environment. This site could offer significant potential for biodiversity net gain as well as landscape improvements to reflect its location close to the AONB and coast. Similar considerations could also be given to the regeneration site at the Former Sproughton Sugar Beet Factory, albeit being located in a less environmentally sensitive location.	Text amended accordingly.
	The policy could be strengthened by making provision for some kind of employment, skills and training initiative directed towards specific population groups.	Requires consideration. Propose further text amendment. This cannot be specific to a particular demographic as we lack the evidence to support this however it could be looked at on a case by case basis and if evidence emerges or there is a clear skills and training strategy targeted groups this could be used in guidance:  In determining applications for new employment development weight shall be given to proposals which make provision for skills and training packages which are supported by the LPA.
SP06 – Retail and Town Centre Use	Policy SP06 states that a sequential test should be provided for retail and town centre uses proposed outside of the defined town centre areas, without specifying what the criteria to be applied in this sequential test. The policy could be given greater clarity by setting out the sequential test criteria.	To be further reviewed in context of use class E.
	The policy could do more to recognise the positive role community facilities (D2), particularly meeting places, can play in town centres, as it would be beneficial for such uses	Footnote to policy been added to address this recommendation. - [1] Town centre uses include retail development (including warehouse clubs

Joint Local Plan Policy	LUC Recommendation	BMSDC Response
	to be located in areas where people can access easily and are likely to visit anyway.	and factory outlet centres), leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive through restaurants, bars and pubs, nightclubs, casinos, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities) [NPPF, 2019].
	Reference could also be added to protecting and enhancing the historic environment as a result of development, because a number of town centres fall within Conservation Areas where a number of listed buildings are present. Consideration could also be given to the effect development might have on the townscape.	Policy has been amended to add considerations as recommended with criteria 3 - In order to protect and enhance the historic environment of the settlements, development proposals will need to demonstrate they have been designed with the setting and townscape taken into consideration.
SP07 - Tourism	The policy provides a high level support for tourism related development, rather than any specifics, referring instead to other policies in the JLP.	The policy is intended to be applicable to all types of tourism rather than specific projects (although for context some key projects are set out in the supporting text).
	Although there are no specific recommendations, consideration should be given as to whether this policy might benefit from more specific guidance as to the types of tourism related development that would be encouraged and/or discouraged, taking into account the character of the towns, villages, countryside and coastal character of the JLP area, and the associated environmental sensitivities. There may also be opportunities for heritage-led tourism development that brings back disused or under-used heritage assets into appropriate productive use (e.g. cultural activity).	The text and policy now specifically mention heritage and landscape tourism. Propose adding recreational in light of DM comments to read recreational, heritage and landscape. Policy new states enhancement of assets actively encouraged. Anticipate it will be supported with guidance in due course.
	In addition, it might be useful to give guidance on how tourism related development might contribute to climate change mitigation, for example by encouraging access by modes of transport other than the car.	Criteria 3 now refers to climate change mitigation. Propose adding adaption and mitigation.
SP08 – Strategic Infrastructure Provision	The text under 'Discounted alternative approaches' states that other infrastructure matters are recognised as important to the delivery of growth but are considered to be of a more local nature and are addressed in the Places sections where appropriate. It is recommended that further consideration is given by the Councils to the inclusion of water supply and treatment infrastructure and green infrastructure networks (in order to support landscape scale improvements) as requiring a strategic approach, particularly in view of climate change, and whether there could be more specific reference made to the different types of infrastructure that will be expected as part of development, such as SuDS and waste management facilities.	Water infrastructure now specifically referred to in policy.
		Green infrastructure is (in order to support landscape scale improvements) & in view of climate change is addressed in SP09.
		Footnote still to be added cross referring to IDP for definitions and detailed list as this may be subject to change and IDP would provide most up to date definitive list linked into funding strategies.
SP09 – Enhancement and Management of the Environment	The policy is very high level with little in the way of specific proposals or guidance, with the exception of the Protected Habitats Sites Mitigation Zone. For example, the policy could make specific reference to how the Councils intend to develop and deliver a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries, in accordance with para 171 of the NPPF. This could mention specific environmental enhancement and protection measures, such as biodiversity net gain and Sustainable urban Drainage Systems (SuDS). Reference could also be	Policy & text has been amended in line with SA recommendation.

Joint Local Plan Policy	LUC Recommendation	BMSDC Response
	added to the various ways in which the Council propose to monitor environmental performance.	
	The policy wording "Development that creates new dwelling(s) within the identified Protected Habitats Sites Mitigation Zone will need to consider impacts" could be made clearer. For example, whether a Habitats Regulations Assessment will be required and/or which impacts will need to be considered (with specific reference to the relevant internationally designated sites).	Policy text has been amended in line with SA recommendations (see criteria 3).
SP10 – Climate Change	The policy could detail proactive approaches to protecting against flooding, coastal change, water supply, biodiversity, landscapes and visual impacts and extreme temperatures. For example, sustainable construction techniques that regulate building temperatures, tree planting and shelter in the public realm including public transport nodes and stops, in addition to biodiversity net gain.	Criteria 1 amended to add... proactive approaches may include sustainable construction techniques that regulate building temperatures, tree planting and shelter in the public realm including public transport nodes and stops, in addition to biodiversity net gain.
	The last clause E "Support new development that demonstrate a proposed approach for reducing waste and the use of existing resources throughout the lifetime of the development" is not very clear either in terms of its links to climate change or in the way that it is worded (its policy intent).	Clause E removed.
LP01 – Windfall Development in Hamlets and Dwelling Clusters	The policy could include reference to Part M4(2) of the Building Regulations, stating that new dwellings provided as part of windfall development must meet the requirements for accessible and adaptable dwellings. Support for such development where it contributes to affordable or social housing could be provided by the policy where there is an identified need.	Not actioned in policy but text amendment made.
	It is also recommended that additional text is added to the policy minimising the impact of development on climate change, similar to clause 5 in Policy LP02 – Residential Annexes. This could be through the implementation of sustainable construction practices and/or renewable energy technologies.	Criteria amended - through the implementation of sustainable construction practices and/or renewable energy technologies.
	Additionally, the policy could ensure that development does not result in adverse effects on residential amenity.	Criteria added into (a).
	Lastly, the policy seeks to protect AONBs and designated heritage, but reference could also be made to protecting and enhancing biodiversity and geodiversity affected by development, the protection of open space, and undesignated heritage assets where appropriate.	Criteria added to protecting and enhancing biodiversity and geodiversity affected by development, the protection of open space, and undesignated heritage assets where appropriate.
LP02 – Residential Annexes	The policy could include reference to Part M4(2) and Part M4(3) of the Building Regulations, stating that new dwellings provided residential annexes must meet the requirements for accessible and adaptable dwellings, and must be suitable for wheelchair users.	Not actioned.
	Specific reference is made to listed building status, but this could be broadened out to refer to the historic environment more generally, to cover aspects such as where Conservation Area status applies as well as just listed buildings.	Policy amended and refers to heritage assets.
	Lastly, reference could be made to protecting and enhancing biodiversity and geodiversity affected as a result of	Additional criteria added in line with recommendation - Where applicable, proposals

Joint Local Plan Policy	LUC Recommendation	BMSDC Response
	development, as per clause e for Policy LP03 - Residential Extensions and Conversions.	must protect and enhance biodiversity and geodiversity affected by the development.
LP03 – Residential Extensions and Conversions	Specific reference is made to listed building status, but this could be broadened out to refer to the historic environment more generally, to cover aspects such as where Conservation Area status applies as well as just listed buildings.	Criteria amended to refer to heritage assets.
LP04 – Replacement Dwellings in the Countryside (Outside Settlement Boundaries)	The policy could include a requirement for development to not take place on the best and most versatile agricultural land.	Text amended in line with SA recommendation. The proposal must not take place on the best and most versatile agricultural land.
LP05 – Replacement Dwellings and Additional Dwellings on Sub-Divided Plots Within Settlement Boundaries	None	Not applicable
LP06 – Mix and Type of Composition	None	Not applicable
LP07 – Supported and Special Needs Housing	The policy could add a requirement for proposals to ensure heritage assets and their settings are maintained and where opportunity arises enhanced.	Policy amended in line with SA recommendation - The proposal must ensure heritage assets and their settings are maintained, protected and enhanced.
	The policy could also specify the need for high quality development that is sympathetic to the surrounding townscape and landscape. Lastly, reference could be made to protecting and enhancing biodiversity and geodiversity as a result of development.	Policy amended - The proposal is well designed to a high-quality standard and will meet any special needs of the residents of the property and is sympathetic to the surrounding townscape and/or landscape.
LP08 – Affordable, Community Led and Rural Exception Housing	None	Not applicable
LP09 – Provision for Gypsy and Traveller and Travelling Showpeople	The policy states that the principle for Traveller development will be considered as with other residential development in other policies. In terms of equality, this is positive, but it is also assumed that this means that similar protection is given to landscape, biodiversity, and historic environment considerations, including with respect to matters such as noise, light and water pollution. For the avoidance of doubt, this could be made explicit to reduce uncertainty.	Policy text amended in line with SA recommendations – e, f & j - The proposal must not cause any detrimental effects to amenity. For example (but not limited to) noise, light and water pollution. Special regard shall be given to protecting and enhancing landscape, biodiversity and geodiversity affected by the proposal. The proposal must ensure heritage assets and their settings are maintained, protected and enhanced where the opportunity arises.
	As the other residential policies do not make reference to the protection of best and most versatile agricultural land, this could also be made explicit.	The proposal must not result in loss of best and most versatile agricultural land.
LP10 – Moorings, Marinas and Houseboats	None	Not applicable
LP11 – Self Build and Custom Build	The policy does not make reference to the protection of the landscape, biodiversity and the historic environment as a result of development, in addition to residential amenity. In order to strengthen this policy and make it more consistent with the other policies, these references could be added.	Policy criteria added in line with SA recommendations:  <ul style="list-style-type: none"> <li>■ Special protection will be given to the landscape, biodiversity and the historic environment.</li> </ul>
	It is also recommended that additional text is added to the policy minimising the impact of development on climate	

Joint Local Plan Policy	LUC Recommendation	BMSDC Response
	change. This could be through the implementation of sustainable construction practices and/or renewable energy technologies.	<ul style="list-style-type: none"> <li>■ The proposal must not cause significant harm to residential amenity.</li> <li>■ The proposal must minimise the impact of development on climate change and will be expected to minimise dependence on fossil fuels and make the fullest contribution to the mitigation of climate change through implementation of sustainable construction practices and renewable energy technologies.</li> </ul>
LP12 – Employment Development	It is recommended that additional text is added to the policy minimising the impact of development on climate change. This could be through the implementation of sustainable construction practices and/or renewable energy technologies.	Criteria added: Minimise impact from development on climate change through the implementation of sustainable construction practices and /or renewable energy technologies.
	Additionally, reference could be made to protecting and enhancing biodiversity and geodiversity affected by development.	Biodiversity and geodiversity criteria added.
	Lastly, this policy could promote the use of more sustainable and active modes of transport through footpath and cycle route improvements as part of development, or to encourage siting of such development where it can be easily accessed by public transport.	Active modes of transport added.
	It is noted that, under this policy, proposals for employment use must be in accordance with the spatial distribution/settlement hierarchy as set out in JLP Part 1, which seeks to focus development in the Ipswich Fringe, Market Towns and Urban Areas, plus the Core Villages. However, the supporting text focuses in particular on the rural economy, and rural employment sites. It is not clear whether there are potential tensions between these two aspects of the policy that require clarification. Lastly, the policy could include a requirement for development to not take place on the best and most versatile agricultural land.	Supporting text amended to provide clarification. Policy is applicable to all areas however in line with settlement hierarchy anticipate more development in higher order settlements.
LP13 – Safeguarding Economic Opportunities	Clause 2 of Policy LP13 states that “Where a robust case is made that the land or premises is no longer economically viable or is inherently unsuitable to be retained for an employment, business or appropriate community use, the Council may consider the redevelopment of land and premises for alternative uses”. Clause 2c goes on to state that: “Proposals that would lead to the full or partial loss of employment sites or premises will be required to demonstrate”...“that there would be an overriding environmental or community benefit from redevelopment or change to another business or community use, which outweighs the benefit of the current employment use continuing”. These two clauses appear to be contradictory in that clause 2c assumes that the current employment use could continue, whereas the opening text to Clause 2 refers to cases where it is not viable to suitable to continue with employment uses. It is recommended that this apparent contradiction is resolved.	Criteria added. - that ensure new and existing open spaces, community facilities, including meeting places that are accessible to all will be supported in principle.
	The policy would benefit from clarity as to the meaning of the term ‘community use’ and in particular whether this includes residential uses.	Text added - ‘above the shop’ homes, and/ or a mix of retail and other leisure and cultural activity, including support for the evening economy, and improvements to the public realm, such as tree planting and green infrastructure will be encouraged.

Joint Local Plan Policy	LUC Recommendation	BMSDC Response
LP14 – Town Centre and Retail	The policy could do more to recognise the positive role community facilities (D2), particularly meeting places, can play in town centres, as it would be beneficial for such uses to be located in areas where people can access easily and are likely to visit anyway.	Criteria added. - that ensure new and existing open spaces, community facilities, including meeting places that are accessible to all will be supported in principle.
	Policy LP14 could do more to positively encourage a mix of uses for town centres to maintain and improve their vitality and viability, whilst safeguarding retail uses. For example, it could encourage 'above the shop' homes, a mix of retail and other leisure and cultural activity, including support for the evening economy, and improvements to the public realm, such as tree planting and green infrastructure, which would also help to adapt to extreme weather events brought about by climate change.	Text added - 'above the shop' homes, and/ or a mix of retail and other leisure and cultural activity, including support for the evening economy, and improvements to the public realm, such as tree planting and green infrastructure will be encouraged.
LP15 - Tourism	The last sentence could be made clearer by stating "Is of an appropriate scale for their context and/or comprise of the appropriate conversion of an existing rural building, of landscape, historic or architectural merit, whilst safeguarding and where possible enhancing the historic interest of the asset including its setting.	Text added into policy.
	Lastly, the policy could include a requirement for development to not take place on the best and most versatile agricultural land.	Whilst we understand why this is being suggested given that this covers most of the land area it is considered unduly restrictive for such proposals.
LP16 – Countryside Tourist Accommodation	With regard to landscape and townscape, the policy could require all visitor accommodation to be sympathetic to the character of the area.	Text amended in line with recommendations for all new tourist accommodation.
	The policy could also require any new accommodation to protect and enhance heritage assets within the area, as well as the settings of these heritage assets.	
	Likewise, reference could also be made to the protection and enhancement of biodiversity and geodiversity as a result of development.	
	It is also recommended that additional text is added to the policy minimising the impact of development on climate change. This could be through sustainable construction practices and/or renewable energy technologies, for example solar PV panels on roofs.	
LP17 – Environmental Protection	Although clause 1a of Policy LP17 seeks to prioritise brownfield land over the development of best and most versatile agricultural land, where development needs to take place on greenfield land, non-best and most versatile land could be prioritised for development, where possible and consistent with other policies in the JLP, over best and most versatile agricultural land.	Criteria 1a amended in line with SA recommendation.
LP18 – Biodiversity and Geodiversity	The policy could be strengthened by requiring a minimum level of biodiversity net gain to be achieved.	Supporting text amended with addition of: In order to meet the biodiversity net gain initiative development proposals will be required to meet a minimum of 10% increase or in line with Government requirements. & Policy criteria F amended to 10%.
	In addition, geodiversity/geological conservation is referred to once in the policy itself and where this happens it is linked in with priority habitats. Although sites of geological interest are not as numerous or significant as biodiversity sites in the	Separate criteria added for geodiversity - Protect and improve sites of geological value and in particular geological sites of international, national and local significance.

Joint Local Plan Policy	LUC Recommendation	BMSDC Response
	JLP area, it would make the policy clearer if the policy approach to geodiversity was dealt with as a separate clause in the policy.	
	Also, it would be of benefit if the policy title was changed to LP18 – Biodiversity and Geodiversity, to make it clear that this policy covers both aspects of the environment.	Title amended.
LP19 - Landscape	Some of the policy wording could be made clearer in order to improve its understanding and interpretation. For example, clause 1a of Policy LP19 leads on the natural and historic environment, rather than on landscape character, and reference to visual amenity is within the context of human health and living conditions, rather than the landscape context. It is not clear what living conditions (which may be interpreted by some to refer to the quality of housing) are linked.	Policy has been re-written guided by LUC landscape specialists. All SA points addressed.
Greater clarity could be achieved by starting Policy LP19 with clause 1b (i.e. the positive dimension to the policy – the types of development that would be supported) and clause 1a moved to a new and separate clause (e.g. a new clause 2) about which developments would not be permitted and why, with this given greater clarity in terms of policy wording as recommended above.		
There is reference in clause 1c to dark skies, to which could be added tranquil areas.		
Clause 1d refers to “Development that enhances and protects landscape values”, which might benefit from explanation.		
With respect to clause 2, it appears that a comprehensive landscape scheme will be required as part of each and every planning application, which will need to be approved by the Local Planning Authority. This may require clarification, if the Councils consider that there are some applications where it is not relevant or appropriate for comprehensive landscape schemes to be submitted.		
LP20 – Area of Outstanding Natural Beauty	Some of the policy wording could be made clearer in order to improve its understanding and interpretation. For example, clause 1a of Policy LP19 leads on the natural and historic environment, rather than on landscape character, and reference to visual amenity is within the context of human health and living conditions, rather than the landscape context. It is not clear what living conditions (which may be interpreted by some to refer to the quality of housing) are linked.	
Greater clarity could be achieved by starting Policy LP19 with clause 1b (i.e. the positive dimension to the policy – the types of development that would be supported) and clause 1a moved to a new and separate clause (e.g. a new clause 2) about which developments would not be permitted and why, with this given greater clarity in terms of policy wording as recommended above.	Reordering of 1b required.	
There is reference in clause 1c to dark skies, to which could be added tranquil areas.	Reference added.	
Clause 1d refers to “Development that enhances and protects landscape values”, which might benefit from explanation.	Outstanding.	

Joint Local Plan Policy	LUC Recommendation	BMSDC Response
	With respect to clause 2, it appears that a comprehensive landscape scheme will be required as part of each and every planning application, which will need to be approved by the Local Planning Authority. This may require clarification, if the Councils consider that there are some applications where it is not relevant or appropriate for comprehensive landscape schemes to be submitted.	Actioned.
LP21 – The Historic Environment	This is very comprehensive policy although in parts the wording does not flow very smoothly or clarity could be improved. For example, it is not clear why, under clause a, why assets in isolated locations have been singled out, and there are no 'conditions' component to this clause about the appropriateness of such re-use/refurbishment commensurate with the assets interest and significance.	Policy has been re-written guided by LUC historic environment specialists.
	Clause g does not follow from the opening sentence "The Councils will:"	
	In addition, clause h is a very long clause, which is not easy to understand on first reading.	
LP22 – Change in Land Use for Equestrian or Other Animal/Rural Land Base Uses	No reference to the historic environment is made. It would be beneficial for the policy to state that development must not result in adverse effects on the historic environment. Specifically, the policy could specify that development must protect and enhance existing heritage assets and their settings.	Additional criteria added into policy: The proposal must protect and enhance any existing heritage assets and their settings.
LP23 – Agricultural Land to Residential Garden Land	None	Not applicable
LP24 – New Agricultural/Rural Buildings in the Countryside	None	Not applicable
LP25 – Sustainable Construction and Design	This policy could be strengthened in terms of climate change adaptation by making specific reference to mitigating flood risk. For example, reference to the incorporation of SuDS in development could be added. The policy could also set out what design characteristics development could incorporate, so as to help buildings respond to winter and summer temperatures as a result of climate change (e.g. shading and landscaping).	Policy criteria added: Demonstrate climate change adaptation and mitigation measures by adopting effective design principles (including shading, landscaping, site layout and building orientation); be designed to minimise the energy demand of the building through maximising natural sunlight and ventilation, effectively utilising solar gains and to help buildings respond to winter and summer temperatures and incorporate flood mitigation measures, such as sustainable urban drainage systems.
	Clause 4 refers to 'major developments' but does not define what this means. This could be clarified.	This has been defined in glossary (10+ units).
LP26 – Design and Residential Amenity	The reference to bin storage could specifically refer to recycling and re-use, rather than just bins.	Clarification added into policy specifically referencing including recycling and re-use bins.
	No specific mention is made of the need to design for climate change, such as extreme weather events including heat and excessive rain. Climate change adaptation should be factor in all development design.	Additional criteria added into (1) re. climate change adaptation.
LP27 – Energy Sources, Storage and Distribution	None	Not applicable

Joint Local Plan Policy	LUC Recommendation	BMSDC Response
LP28 – Water Resources and Infrastructure	In its response to the SA Scoping Report consultation, the Environment Agency stated that “further attention should be brought to the importance of geomorphological impacts on rivers. Developments often use hard engineering along river corridors and as such often leads to a reduction of wildlife value. Culverts result in the same effect – an un-natural change in watercourse function which can also lead to flooding. We have a no-culvert policy when we look at applications and alternatives should be sought for developments.” It is therefore recommended that suitable wording regarding de-culverting is incorporated into the policy wording.	Supporting text amended and Policy amended with additional criteria: Complies with the relevant statutory environmental body policy on culverts.
LP29 – Flood Risk and Vulnerability	None	Not applicable
LP30 – Designated Open Spaces	The policy could provide support for proposals that improve the biodiversity interest of designated open space, including as part of wider ecological networks, and improve accessibility for all.	Policy amended: proposals improve the biodiversity interest of designated open space, including as part of wider ecological networks, and improve accessibility for all.
LP31 – Services and Facilities Within the Community	It is recommended that additional text is added to the policy minimising the impact of development of community services and facilities on climate change. This could be through the implementation of sustainable construction practices and/or renewable energy technologies.	Text amended and SA recommendation added to criteria B & C: Development should be of a high quality development and sympathetic to the surrounding landscape and townscape, with no adverse effects on heritage assets and their settings.
	The policy could also specify the need for high quality development that is sympathetic to the surrounding landscape and townscape, with no adverse effects on heritage assets and their settings.	To minimise the impact of development on climate change, sustainable construction practices and/or renewable energy technologies should be incorporated into proposals.
LP32 – Safe, Sustainable and Active Transport	It is recommended that additional text is added to require active travel to be tied in with the green infrastructure network thereby providing additional positive effects for access to green spaces and wildlife habitats.	Supporting text amended and policy criteria 2 amended with additional text: Where possible, active travel to be tied in with the green infrastructure network thereby providing additional positive effects for access to green spaces and wildlife habitats.
LP33 – Managing Infrastructure Provision	The policy could be more specific with reference made to the different types of infrastructure that will be expected as part of development, such as SuDS and waste management facilities. Currently this information is provided in the supporting text to the policy.	Detail added into text but have intentionally not put a list in the policy as it could be argued that if something is missed it is not relevant. Instead we will rely on IDP which will future proof the policy approach. A footnote has been added accordingly.
	There is no specific reference to green infrastructure, which would benefit from receiving policy support, and achieve positive effects against, for example SA objective 11 (Biodiversity).	The policy is applicable to all infra, inc. green but green needs to be specified (action outstanding).
LP34 – Health and Education Provision	Reference could be added to the dual use of schools such that facilities within school grounds can also be used by the community and agreed under a Community Use Agreement.	Policy criteria 3 has been amended to include supporting dual use which can also be used by community.
LP35 – Developer Contributions and Planning Obligations	None	Not applicable

**7.710** It can be seen from the above table that BMSDC have responded positively to nearly all the recommendations in the SA.

**7.711** In addition, the SA of the reasonable sites referred to in **Chapter 6 (Sustainability Appraisal of Reasonable Alternative Sites)** of this SA Report fed into decision-making

by BMSDC as to which sites to allocate in Part 3 of the JLP, along with other evidence.

**7.712** As part of the SA process, it was recommended that a Heritage Impact Assessment of potential site allocations was undertaken, along with a Landscape Sensitivity Assessment. As a result of this work, which directly fed into the SA, amendments were made by the Council as to which sites to allocate. This also informed site specific mitigation for inclusion in the site allocation policy wording.

### Reasons for choosing the plan

**7.713** A statement has been prepared by BMSDC in accordance with the requirements of Regulation 16 of the

Environmental Assessment of Plans and Programmes Regulations 2004. This statement outlines how environmental considerations have been integrated into the Local Plan, how the Sustainability Appraisal has been taken into account, how consultation responses have been taken into account, the reasons for choosing the adopted Local Plan policies in light of alternative options and the measures that will be taken to monitor the effects of the Local Plan.

**7.714** It should be noted that the reasons given by BMSDC for allocating or discounting specific sites are presented in **Appendix G (Reason for Selecting or Rejecting Site Options)**.

#### **How environmental and sustainability considerations have been integrated into the new Babergh and Mid Suffolk Joint Local Plan**

The Sustainability Appraisal has been conducted in such a way that it meets the requirements of the EU Strategic Environment Assessment Directives (including through EU exit legislation) and UK Government guidance on the preparation of Sustainability Appraisals. As required by the regulations, the Sustainability Appraisal has been developed through an iterative process and has informed decision making at every stage of developing the Babergh and Mid Suffolk Joint Local Plan.

The initial informative stage of the Sustainability Appraisal was the scoping process. The scoping process included a review of other relevant plans, programmes and strategies that have an influence on sustainability and provide the policy context for the Local Plan. The social, environmental and economic baselines were established which identified the key sustainability issues to be addressed and provided the basis from which the potential effects of the Local Plan could be assessed. The scoping process has been updated as the plan has developed over time. The most recent scoping consultation was March April 2020. This was undertaken in advance of the assessment of the Regulation 19 Joint Local Plan and provides basis upon which the Joint Local Plan is appraised.

#### **How the Sustainability Appraisal has been taken into account**

The policies and sites within the Joint Local Plan have been subject to Sustainability Appraisal throughout their development, along with reasonable alternative options. Each policy and proposal has been assessed against the social, environmental and economic objectives in the SA Framework in order to establish the positive and negative effects. Where significant effects were found potential mitigation measures were identified wherever possible. The results of the appraisals were used to inform the decision making process and establish appropriate options to take forward into the Joint Local Plan. Each stage of developing the Joint Local Plan has included undertaking Sustainability Appraisal to take account of new evidence and new policy options. These updates helped further refine the options to include in the Joint Local Plan.

The Sustainability Appraisal Report included the individual appraisals for each policy option taken forward into the Local Plan as well as all of the reasonable alternative options considered. The reasons for discounting alternative options are set out in **Chapter 7 (Sustainability Appraisal Findings for the JLP)** under the relevant policies. The SA report also included an overview of all of the policies included in the final draft Local Plan to show the cumulative impact of the policies (see also **Chapter 7**).

#### **How the results of consultation have been taken into account**

The SEA Directive requires that opinions expressed by consultees be taken into account during the development of a plan before the plan is adopted. The Sustainability Appraisal was consulted on alongside consultation on the draft Plan at each stage. All comments and representations were taken into account and used to further refine the Sustainability Appraisal.

#### **The reasons for choosing the Joint Local Plan (Regulation 19), in light of reasonable alternatives considered**

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

- Enabling sustainable economic growth.

- Enhancing and protecting the environment. Delivering appropriate housing.
- Supporting strong and healthy communities & delivering Infrastructure.

The approach within the Plan has been developed with the aim of delivering the spatial vision, informed by a range of both evidence-based studies and the Sustainability Appraisal.

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

#### Level of growth

The Plan sets out to meet both Babergh and Mid Suffolk's objectively assessed needs. The standard method is used to provide the housing requirements of the plan for both districts. No exceptional circumstances have been identified to justify an alternative approach to the standard method.

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

In recent years both Babergh and Mid Suffolk has been below the adopted level of housing requirement and delivery of the level of housing OAN is a key challenge. However, a substantial number of the dwellings required are already permitted which will contribute to meeting the overall requirement. The Councils are also taking proactive measures to improve delivery rates on the permitted sites as well as creating flexibility for sufficient housing development. To achieve this, the Plan has identified a buffer of approximately 20% in the supply of new land to allow for flexibility and will give greater confidence to meeting delivery targets and an ongoing five year land supply.

In consideration of the challenges of meeting the required uplift to deliver OAN it is not considered reasonable nor sustainable to identify land for development in excess that set out in the Joint Local Plan.

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

#### Distribution

In constructing the spatial distribution of this Plan, the Councils have been mindful of the inherent market strengths within the area and have sought to ensure that the most suitable and deliverable sites are proposed. The spatial distribution of housing set out in this Plan seeks to secure a balance to growth in the strategic transport corridor areas, as well as ensuring that other market towns and rural communities benefit from appropriate growth.

Taking account of the extant planning permissions, the distribution of the residual growth seeks to redress the balance of development to the more sustainable settlement based on the settlement hierarchy.

The new development locations have been identified with consideration to consultation responses, the availability and deliverability of sites, the preferred spatial distribution pattern, the sensitivities and constraints of the area (e.g. flood zones, heritage features and landscape designations etc) and the infrastructure capacity and opportunities (e.g. schools and healthcare etc). Sites judged to perform best overall against the above criteria and evidence base outcomes have been proposed in the Plan.

Any alternative sites have been discounted as less consistent with the criteria overall. No other sites or alternatives have been considered where the basic suitability requirements of the Council's Strategic Housing Land Availability Requirements had not been met.

#### Other key policy objectives and issues

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

Based on the overarching objectives of the Joint Local Plan policies and informed through the supporting evidence and the Sustainability Appraisal, the policies framework seeks to ensure the delivery of appropriate housing, enabling sustainable economic growth, enhancing and protecting the environment, supporting strong and healthy communities and delivering

infrastructure. The various Sustainability Appraisal reports published during the preparation of the plan have shown that reasonable and alternative options have been considered and evaluated.

**Measures that are to be taken to monitor the significant environmental effects of the implementation of the plan**

A monitoring framework is included in the Joint Local Plan and takes influence from the monitoring recommendations from the Sustainability Appraisal (**Chapter 8 (Monitoring)**). This enables the significant effects of implementing the Local Plan sites and policies to be assessed and compared to those predicted in this Sustainability Appraisal report. It helps to ensure that any unforeseen adverse effects can be identified, and remedial action taken if required.

## Chapter 8

### Monitoring

**This chapter recommends indicators to monitor the effects of implementing the Joint Local Plan.**

**8.1** The SEA Regulations require that *"the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action"* and that the environmental report should provide information on *"a description of the measures envisaged concerning monitoring"*. Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.

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

**8.3 Table 8.1** sets out a number of suggested indicators for monitoring the potential sustainability effects of implementing the JLP. The data used for monitoring in many cases will be provided by outside bodies, for example the Environment Agency. It is therefore recommended that the Councils remain in dialogue with statutory environmental consultees and other stakeholders and works with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable.

Table 8.1: Proposed monitoring indicators

SA Objectives	Proposed Monitoring Indicators
<p>1. To improve the health and wellbeing of the population overall and reduce health inequalities.</p>	<ul style="list-style-type: none"> <li>■ Performance against relevant indices of multiple deprivation indicators</li> <li>■ % of adult participation in sport</li> <li>■ Obesity rates of adults and children</li> <li>■ Access to doctors surgeries and average wait times for appointments</li> <li>■ Number of S.106 contributions secured for health, education and community services</li> <li>■ Residents opinion on availability of open space/leisure facilities</li> <li>■ Life expectancy</li> <li>■ Obesity levels</li> </ul>
<p>2. To maintain and improve levels of education and skills in the population overall.</p>	<ul style="list-style-type: none"> <li>■ GCSE or equivalent performance</li> <li>■ Level 2 qualifications by working age residents</li> <li>■ Level 4 qualifications and above by working age residents</li> <li>■ Employment status of residents</li> <li>■ Net additional square metres of educational floor space by primary, secondary, further, higher and vocational levels.</li> <li>■ S.106 contributions secured for education and training services</li> <li>■ Average gross weekly earnings</li> <li>■ Number of young people in higher or further education or vocational levels</li> <li>■ Average minimum travel time to schools</li> <li>■ Performance against relevant indices of multiple deprivation indicators</li> </ul>
<p>3. To reduce poverty and social exclusion and ensure access to jobs and services.</p>	<ul style="list-style-type: none"> <li>■ Employment / unemployment rate in the district</li> <li>■ % of population within 30 minute public transport time of educational, healthcare and community facilities</li> <li>■ S.106 contributions accumulated per annum for improvements to public transport, leisure services, education, health and community services</li> <li>■ Performance against relevant indices of multiple deprivation indicators</li> </ul>
<p>4. To meet the housing requirements of the whole community.</p>	<ul style="list-style-type: none"> <li>■ Residential property prices and sales</li> <li>■ Number of households registered on the 'Self-build Register'.</li> <li>■ Net additional dwellings and proportion of these in towns, villages and countryside areas</li> <li>■ Performance against relevant indices of multiple deprivation indicators</li> <li>■ 5 Year Housing Land Supply (Expressed as a % and Years)</li> <li>■ Affordable dwelling completions expressed as a percentage of total dwelling completions on developments</li> <li>■ Annual dwelling completions</li> <li>■ Size and age of housing stock</li> <li>■ Gypsy &amp; Traveller pitches granted consent</li> <li>■ Total number of Traveller pitches</li> <li>■ Homelessness</li> </ul>
<p>5. To conserve and enhance water quality and resources.</p>	<ul style="list-style-type: none"> <li>■ Water use per household</li> <li>■ Water pollution incidents recorded by the Environment Agency</li> </ul>

SA Objectives	Proposed Monitoring Indicators
	<ul style="list-style-type: none"> <li>■ Water quality (and trends) in river basin district (river quality data)</li> <li>■ Number of planning permissions granted contrary to sustained objection of the Environment Agency on water quality grounds</li> <li>■ % water bodies at good ecological status or potential</li> <li>■ % water bodies at good or high biological status</li> <li>■ % water bodies at good chemical status</li> <li>■ Incorporation of SuDS into new developments</li> <li>■ Compliance with environmental quality standards in identified locations</li> </ul>
6. To maintain and where possible improve air quality and reduce noise pollution.	<ul style="list-style-type: none"> <li>■ % of journeys to work by public transport or active transports</li> <li>■ Air pollution data</li> <li>■ Number of noise complaints submitted to the Council</li> <li>■ Road and rail noise levels produced by Defra</li> </ul>
7. To conserve soil and mineral resources.	<ul style="list-style-type: none"> <li>■ % of development taking place on previously developed land</li> <li>■ % of applications permitted on the Districts' Best and Most Versatile Agricultural Land</li> <li>■ Number of planning applications approved within a Minerals Consultation Area</li> </ul>
8. To promote the sustainable management of waste.	<ul style="list-style-type: none"> <li>■ Non-recyclable waste generation per capita</li> <li>■ % of household waste that was reused, recycle or composted</li> </ul>
9. To reduce contribution to climate change.	<ul style="list-style-type: none"> <li>■ % energy supplied from renewable sources</li> <li>■ Planning permissions for renewable energy installations</li> <li>■ Number of new developments incorporating low carbon technologies</li> <li>■ Carbon dioxide emissions</li> <li>■ % of journeys made by public transport or active transport</li> <li>■ Energy consumption GWh/households</li> <li>■ Air Quality Management Areas</li> <li>■ Nitrogen dioxide emissions</li> <li>■ PM2.5 emissions</li> <li>■ PM10 emissions</li> </ul>
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	<ul style="list-style-type: none"> <li>■ Amount of housing and employment land delivered within Flood Zones 2 and 3</li> <li>■ Residential properties flooded from main rivers</li> <li>■ Number of planning applications granted planning permission contrary to Environment Agency advice.</li> <li>■ Incidence of flood warnings in site area</li> <li>■ Distance to areas that are susceptible to surface water flooding</li> <li>■ Number of applications where there was a failure to pass the sequential test, even though sites at lower risk of flooding were available. But other planning reasons were given for granting planning permission.</li> <li>■ Numbers of trees planted within urban areas</li> <li>■ Ha of open space and Green Infrastructure</li> <li>■ Number of new developments incorporating SUDS</li> </ul>

SA Objectives	Proposed Monitoring Indicators
<p>11. To conserve and enhance biodiversity and geodiversity.</p>	<ul style="list-style-type: none"> <li>■ Number and hectares of SSSIs</li> <li>■ % of District's SSSI in a favourable or unfavourable condition</li> <li>■ Number and Ha of Local Wildlife Sites and County Wildlife Sites</li> <li>■ Ha of Ancient Woodland</li> <li>■ Number and Ha of County Geological Sites</li> <li>■ Amount of development that takes place on Greenfield Land</li> <li>■ Achievement of Biodiversity Action Plan targets</li> </ul>
<p>12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.</p>	<ul style="list-style-type: none"> <li>■ Number of entries on the Heritage at Risk Register</li> <li>■ Number of entries removed from the Heritage at Risk Register</li> <li>■ Number of planning applications approved contrary to Historic England and / or Conservation Officer advice.</li> <li>■ Number of designated and non-designated heritage assets</li> <li>■ Number of planning applications approved in Archaeological Priority Areas</li> </ul>
<p>13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.</p>	<ul style="list-style-type: none"> <li>■ Developments permitted contrary to Landscape Sensitivity Assessment (sites with high sensitivity)</li> <li>■ % of development build on brownfields sites / previously developed land</li> <li>■ Ha of open space in the District</li> <li>■ Green Infrastructure secured through development</li> <li>■ Ha of Ancient Woodland</li> <li>■ Number and extent of field boundaries affected</li> </ul>
<p>14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.</p>	<ul style="list-style-type: none"> <li>■ Amount of new employment land generated</li> <li>■ Typical amount of job creation (jobs per ha) within different use classes</li> <li>■ Shop occupancy and vacancy rates in key towns and service centres</li> <li>■ Net additional square metres of office space granted planning permission</li> <li>■ Employment rates</li> <li>■ Employment statis by residents and job type</li> <li>■ Job densities</li> <li>■ Number of people claiming jobseekers allowance</li> <li>■ Performance against relevant indices of multiple deprivation indicators</li> <li>■ Economic productivity</li> <li>■ Economic activity of residents</li> <li>■ Amount of vacant industrial floorspace</li> <li>■ Proportion of business in rural locations</li> </ul>
<p>15. To revitalise the District's town centres.</p>	<ul style="list-style-type: none"> <li>■ Total number of shops within town centres</li> <li>■ Total number of vacant shops with town centres</li> <li>■ Net additional square metres of retail floorspace</li> <li>■ Net dwelling completions per annum within town centres</li> <li>■ Implemented and outstanding planning permissions for retail, office and commercial use</li> <li>■ Pedestrian footfall count</li> <li>■ Number of post offices closed down</li> </ul>

SA Objectives	Proposed Monitoring Indicators
	<ul style="list-style-type: none"> <li>■ Number of village shops closed down</li> </ul>
<p>16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.</p>	<ul style="list-style-type: none"> <li>■ % of journeys made by public transport or active transport</li> <li>■ Car ownership</li> <li>■ S.106 contributions accumulated per annum for highways works</li> <li>■ Network performance on roads</li> <li>■ Public transport punctuality and efficiency</li> </ul>

## Chapter 9

### Conclusions and Next Steps

**This chapter summarises the key findings of the SA and outlines the next stages of the SA and Joint Local Plan preparation process.**

#### Conclusions

**9.1** The Babergh and Mid Suffolk Joint Local Plan (JLP) sets out a framework for development in the Plan area over a 19 year period, from 2018 to 2037. It includes a set of Plan objectives, 10 strategic policies, a series of more detailed development management policies, as well as a large number of site allocations to provide certainty about where development will take place over the Plan period.

**9.2** Babergh and Mid Suffolk are predominantly rural Districts, characterised by a small number of Market Towns, a larger number of 'Core Villages', plus many smaller Hinterland Villages and Hamlets. All are surrounded by farmed countryside, with some areas of high landscape and biodiversity value, with the Stour and Orwell Estuaries being internationally important for wildlife. The two Districts contain a number of historic towns and villages, and there are many listed buildings, scheduled monuments and conservation areas across the whole Plan area.

**9.3** Babergh and Mid Suffolk have strong economic relationships with nearby settlements, in particular Ipswich to the east but also Bury St Edmunds to the west, linked by a strategic road and rail transport corridor. Although there are some communities with relatively high deprivation, the two Districts as a whole are not deprived compared to national averages, but there are acute issues regarding housing need and housing affordability. Also, there is a high proportion of more elderly residents.

**9.4** In the future, issues such as climate change are likely to become more pronounced, with potential effects on the water environment, as a result of longer hot spells, and extreme rainfall events. Added to this are the uncertainties surrounding Brexit and COVID-19.

**9.5** It is within this context that Babergh and Mid Suffolk Councils (BMSDC) have prepared the Proposed Submission

(Reg 19) Joint Local Plan. It identifies a need for over 18,000 new homes over the Plan period and provides for over 20,000 homes to be delivered. If just the housing need itself were to be delivered, this would result in around a 20% increase in the total housing stock of the Plan area, built in less than 20 years. This would undoubtedly do a great deal to address the issues of lack of housing and, in particular, affordable housing that people living in the two Districts currently face.

**9.6** However, it will place pressure on the environment, both in terms of its assets, such as biodiversity, landscape and the historic environment, and resources such as water. These issues, in particular, have been subject to considerable research and evidence base studies that have informed both the preparation of the JLP and the SA. They have been addressed by some very strong policies in both Part 1 and Part 2 of the JLP, with respect to environmental protection and enhancement, and infrastructure provision, which scored very positively in the SA, and which the SA helped to inform and improve.

**9.7** The SA has appraised a range of alternative ways of distributing the development across the two Districts. It concluded that a spatial strategy that focuses development on the Market Towns and Urban Areas, being the major employment locations and centres of services and facilities, is likely to prove the most sustainable across the full range of SA Objectives. However, it was noted that there are only five Market Towns in the two Districts, and the part of the urban area of Ipswich that lies within the Babergh Mid Suffolk Joint Local Plan area is relatively small.

**9.8** The SA recognised that it would be neither practical nor sustainable for all development to be located at the Market Towns and Urban Areas, given that these only comprise around a quarter of the 2018 housing stock in the Plan area, and that the scope for developing within the part of the Ipswich urban area lying within the Plan area is limited.

**9.9** The SA also noted that there will be local needs outside the Market Towns and Urban Areas that need to be provided for, and support for the jobs, services and facilities that they provide. The SA therefore found that there is a good case in sustainability terms to allow for a reasonable proportion of development to be provided at the Core Villages and the Ipswich Fringe (which together account for around 40% of the 2018 housing stock), particularly in Sustainable Transport Corridors, all of which performed similarly across the SA Objectives taken as a whole. However, the SA recommended that a large volume of dispersed development across the smaller settlements should be avoided.

**9.10** The spatial distribution of housing development in the JLP is largely in line with the recommendations of the SA. The number of homes to be delivered in the Market Towns and Urban Areas is, on an average number of homes per

settlement basis, far higher than any of the other settlement hierarchy categories, with a particular focus on Stowmarket, Sudbury/Great Cornard, and Hadleigh. The SA tested other alternatives for the housing spatial distribution for both Babergh and Mid Suffolk and found that none performed any more strongly against the SA Objectives than the spatial strategy in the JLP.

**9.11** The SA noted that, outside the Market Towns and Urban Areas, the focus of development is within the Ipswich Fringe and a small number of Core Villages. In the Ipswich Fringe, the main location of development will be at Sproughton, which offers an opportunity to deliver a series of developments including the regeneration of a former sugar beet factory, linked to the existing Ipswich urban area. Within the Ipswich Fringe, there would also be sizeable development taking place at Barham, Bramford and Copdock and Washbrook. With respect to the Core Villages, the main focus in Babergh is on Capel St Mary on the A14 strategic transport corridor (but with no railway station) between Ipswich and Colchester, and in Mid Suffolk on Elmswell, Thurston and Woolpit which between them offer access to jobs, railway stations, and local shops and services. The SA describes the cumulative effects of the allocations on such settlements.

**9.12** The SA recognised that 60% of the housing supply (under Policy SP04 – Housing Spatial Distribution) already has planning consent (rising to around 70% and 75% of housing need for Babergh and Mid Suffolk respectively, under Policy SP01 – Housing Needs), and that the remaining sites in the Strategic Housing and Economic Land Availability Assessment are limited in number. In addition, the SA noted that individual sites may not always perform as well at the settlement level dependent upon particular site characteristics.

**9.13** Although the concept of a new settlement was explored through the SA of spatial strategy options, BMSDC did not consider a new settlement to be a reasonable alternative for this JLP. This was because there is a sufficient supply of proportionate sites in and around existing settlements to meet housing need, and because of the long lead-in and delivery times required to deliver a new settlement. However, the JLP includes provision to consider a new settlement in the next review of the JLP, which is due within five years of adoption of this version of the Plan.

**9.14** Despite the strong policy safeguards in Part 1 and Part 2 of the Local Plan, and a spatial distribution to development that is largely in line with the findings of the SA, there is a more mixed picture with regard to individual site allocations. In general terms, sites (whether allocated or not) that are closest to the Market Towns perform best across the SA Objectives as a whole, followed by the site allocations in the Core Villages and Ipswich Policy Area. Sites in the Hinterland Villages and Hamlets and Countryside perform less well. In

this respect, the SA of the site allocations largely endorses the findings of the SA of the spatial distribution. In addition, larger sites tended to perform better than smaller sites. However, when it comes to the actual allocations, it did not necessarily follow that the sites that are allocated at any one individual settlement perform more strongly against the SA Objectives, compared to the sites that are not allocated. Sometimes they do, sometimes they perform similarly, and sometimes they do not perform as well.

**9.15** It should be remembered that the SA is only one factor taken into account in making decisions, and a large number of sites already have planning consent. The SA, through supporting evidence, did make a difference in deciding which sites should be allocated. For example, a small number of sites that were earmarked for allocation were subsequently discounted due to the potential impact on the historic environment. For some of the potential significant effects identified by the SA and other evidence, mitigation has been incorporated into the site allocation policies.

**9.16** Overall the SA found that the JLP is likely to have significant positive effects with respect to SA Objective 1 (Health and Wellbeing), SA Objective 3 (Accessibility), SA Objective 4 (Housing), SA Objective 9 (Climate Change Mitigation), SA Objective 12 (Historic Environment), SA Objective 13 (Landscape and Townscape), SA Objective 14 (Economy) and SA Objective 16 (Sustainable Travel). In some instances, the SA recognised that the JLP may have some negative effects too against these SA Objectives, but these are considered unlikely to be significant. The SA recognises that at the site level there could be issues to address, but that there are safeguards in the JLP, either within site allocation policies in Part 3 of the JLP, or in other policies in Part 1 and Part 2 of the JLP Plan, that could be used to mitigate such effects.

**9.17** Significant positive effects were also identified for SA Objective 11 (Biodiversity and Geodiversity), and SA Objective 15 (Revitalising Town Centres), although for these SA Objectives they were mixed with significant negative effects too. This is because, despite the policy safeguards in the JLP, many of the site allocations are in close proximity to designated habitats or priority habitats, and the cumulative effect could be erosion, disturbance or fragmentation of habitats and ecological networks, despite the best efforts of the JLP to avoid this, and indeed its aim to deliver net biodiversity gain. With respect to Town Centres, those allocations that are close to Town Centres are likely to prove supportive, and there are policies in the JLP that provide policy support for Town Centre uses, but a significant proportion of the site allocations are some distance from Town Centres.

**9.18** Significant negative effects were identified for SA Objective 6 (Air and Noise Pollution) primarily because of the potential effects of additional car journeys passing through the Air Quality Management Areas in Sudbury and in neighbouring Ipswich and Bury St Edmunds. Similarly, significant effects were identified for SA Objective 7 (Soils and Minerals) because a number of the site allocations could lead to the permanent loss of best and most versatile agricultural land. In both instances, there are policies in the JLP that seeks to address these issues, but with respect to individual site allocations it is considered that the cumulative overall effect will be negative.

**9.19** With respect to SA Objective 5 (Water), which addresses water resources and water quality, and SA Objective 8 (Climate Change Resilience), which addresses flood risk, the SA identifies the potential for a number of site allocations and reasonable alternative sites to have significant negative effects. However, the SA recognises that a considerable amount of work has been undertaken to ensure that water supply, waste water treatment, and flood risk can all be managed such that these potential significant negative effects will not occur when the JLP is implemented. These findings are reflected in the SA, although a residual risk is still acknowledged in cumulative minor negative effects against these SA Objectives.

**9.20** In summary, therefore, the JLP seeks to accommodate a substantial increase in development, primarily housing, that reflects the economic, social and environmental characteristics of the two Districts, and its relationship with neighbouring areas. This has largely been achieved, and as a result should deliver a range of significant positive effects across SA Objectives, once the strong policy safeguards in the JLP are taken into account. However, delivery will prove challenging over the years to come, and there are a number of issues, particularly environmental issues, that will require careful planning, management and monitoring, not only on an individual site level, but across the Plan area as a whole. If this is achieved, then there is the potential for the significant negative effects identified by this SA to be avoided or reduced, and the JLP to be successfully implemented in accordance with the principles of sustainable development.

## Next steps

**9.21** This SA Report will be available for consultation alongside the Proposed Submission Version (Reg 19) of the Joint Local Plan between November and December 2020.

**9.22** Following this consultation, the Joint Local Plan and accompanying SA Report will be submitted to the Secretary of State for public examination. Any proposed modifications to the Submission version of the Joint Local Plan arising out of

this process may require SA, which will be consulted upon, as necessary.

**LUC**

**October 2020**