

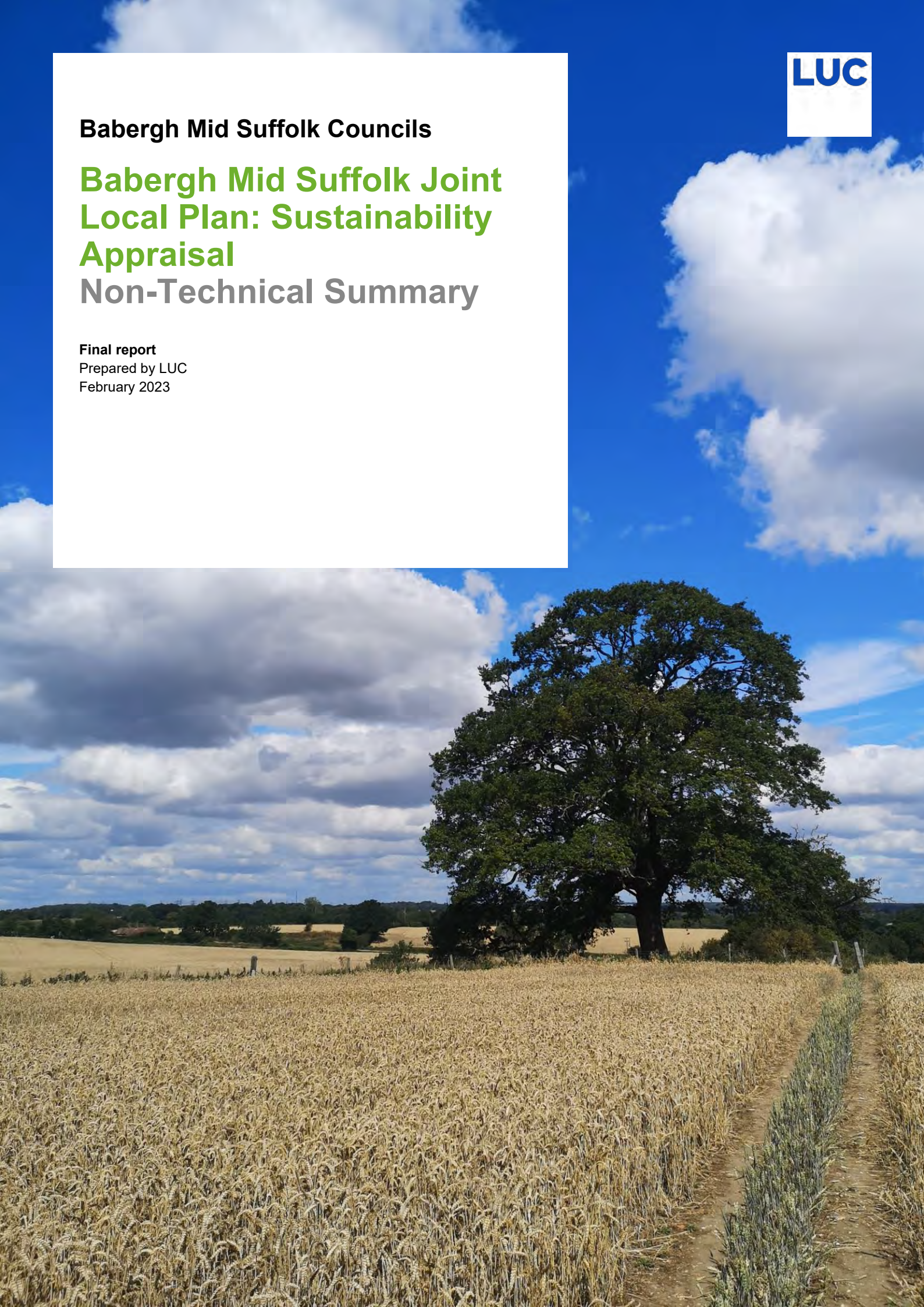
Babergh Mid Suffolk Councils

Babergh Mid Suffolk Joint Local Plan: Sustainability Appraisal Non-Technical Summary

Final report

Prepared by LUC

February 2023



Babergh Mid Suffolk Councils

Babergh Mid Suffolk Joint Local Plan: Sustainability Appraisal Non-Technical Summary

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Non-Technical Summary

Introduction

1. This Sustainability Appraisal (SA) Report: Non-Technical Summary relates to the SA of the Babergh Mid Suffolk Joint Local Plan (the JLP) which is being prepared by Babergh and Mid Suffolk District Councils. It relates to the proposed Main Modifications to the submitted JLP, which have been prepared following Examination hearings. The JLP sets out the long-term spatial vision and objectives for Babergh and Mid Suffolk as well as the policies that are required to deliver that vision over the period up to 2037.

2. Plans and strategies such as the JLP are subject to a process called Sustainability Appraisal (SA), which assesses the likely effects of a plan on social, economic, and environmental issues. This Non-Technical Summary relates to the full SA Report which is being published for consultation alongside the proposed Main Modifications.

3. The Main Modifications propose quite significant changes to the structure and content of the JLP as submitted. The current document is now presented as the Part 1 Plan, with Part 2 to be prepared at a later date. Part 1 comprises the vision, objectives and strategic policies (Section A) and non-strategic development management policies (Section B). The spatial strategy and non-strategic place and allocation policies are proposed to be removed from the JLP as submitted.

Sustainability Appraisal

4. The Planning and Compulsory Purchase Act 2004 requires Local Plans to be subject to SA. SA is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals in a plan from the outset of its development.

5. SEA is also a statutory assessment process, required by the SEA Regulations¹. The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment. The Government advises that a joint SA and SEA process can be carried out by producing an SA Report which incorporates the requirements of the SEA Regulations. This approach has been taken to the SA/SEA of the JLP and the process is referred to for ease as simply 'SA'.

6. The SA has been undertaken in stages alongside the preparation of the JLP in order to provide sustainability guidance as the plan was developed. The approach that has been taken to the SA of the JLP to date is described below.

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

7. 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. The scope of the SA has been constantly reviewed throughout the SA process, and updates published accordingly. Three SA Scoping Reports have been produced, the most recent in March 2020.

8. This Scoping work helped to inform the development of a set of sustainability objectives (referred to as the 'SA framework') against which the effects of the plan would be assessed. The SA framework for Babergh and Mid Suffolk is presented further ahead in this Non-Technical Summary.

SA Stage B: Developing and refining options and assessing effects

9. Developing options for a plan is an iterative process which unusually involves a number of consultations with stakeholders and the public. The SA process can help to identify where there may be other 'reasonable alternatives' to the options being considered for the policies and site allocations to be included in a plan. The reasonable alternative options that have been considered for the JLP have included alternative policy approaches as well as potential sites for new housing and employment development. However, as the site allocations are now proposed to be removed from the Part 1 JLP they are no longer considered in the full SA report or this Non-Technical Summary.

Developing and assessing policy options

10. In August 2017, Babergh and Mid Suffolk District Councils 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.

11. 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

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

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

appraisal of a large number of site options for potential allocation in the JLP.

12. Following on from this stage of SA work, the Councils decided it would be 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 JLP as proposed to be submitted was an appropriate plan when compared to the reasonable alternatives.

13. LUC was therefore appointed in November 2019 to review the SA 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. The Councils therefore commissioned detailed studies, the findings of which could inform the SA.

14. The results of LUC's appraisal of reasonable alternatives were reported in Chapters 5, 6 and 7 of the October 2020 SA Report. This included detailed appraisals of site and spatial strategy options, which were intended to be included in the JLP at the time.

15. At this Main Modifications stage, LUC's appraisal of reasonable alternatives is found in Chapter 5 of the full SA report and focuses on alternatives to the policy approaches now included in the JLP as proposed to be modified.

SA Stage C: Preparing the Sustainability Appraisal report

16. The full SA report and this Non-Technical Summary describe the SA work that has been carried out during earlier stages of JLP preparation and set out the SA findings for the JLP as proposed to be modified. Likely significant effects, both positive and negative, have been presented, taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects.

SA Stage D: Consultation on the Plan and the SA Report

17. Babergh and Mid Suffolk District Councils are inviting comments on the full SA Report and this Non-Technical Summary as well as the schedule of Main Modifications. These documents are being published on the Councils' website for a period of representation.

SA Stage E: Monitoring implementation of the Plan

18. Recommendations for monitoring the sustainability effects of implementing the JLP are presented in Chapter 6 of

the full SA Report and are described further ahead in this Non-Technical Summary.

Policy Context

19. There are a large number of plans and programmes that could be relevant to the preparation of the JLP. In particular, the JLP must adhere to national planning policy as set out in the National Planning Policy Framework (NPPF).

20. A Local Plan should provide a spatial expression of other plans and programmes where relevant, to assist in their implementation. It must also conform to environmental protection legislation and the sustainability objectives established at an international, national and regional level. In line with the requirements of the SEA Regulations, relevant international, national, regional, sub-regional and local plans have been reviewed in detail in relation to their objectives, targets and indicators and their implications for the Plan and the SA. The full review can be seen in Chapter 3 and Appendix B of the full SA Report.

21. The JLP must be consistent with the requirements of the NPPF, which states:

"Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings."

22. The NPPF sets out information about the purposes of local plan-making, stating that 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."*

23. The NPPF also requires Local Plans to be 'aspirational but deliverable'. This means that opportunities for appropriate development should be identified in order to achieve net gains

in terms of sustainable social, environmental and economic development; however significant adverse impacts in any of those areas should be avoided.

24. 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:

- *“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 and green infrastructure, and planning measures to address climate change mitigation and adaptation.”*

25. The NPPF also promotes well-designed places and development, and plans should *“at the most appropriate level, set out a clear design vision and expectations”*.

26. Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development, including qualitative aspects such as design of places, landscapes, and development.

Baseline Information and Key Sustainability Issues

27. In line with the requirements of the SEA Regulations, consideration has been given to the current state of the environment in Babergh and Mid Suffolk Districts. Detailed baseline information for the Districts is presented in Appendix B of the full SA Report and it has been updated throughout the SA process. As well as environmental issues, the baseline information includes a description of social and economic issues in the Districts.

28. The baseline information contributed to the identification of a set of key sustainability issues for the plan area, which in turn helped to develop a locally appropriate SA framework (i.e. a set of SA objectives) that would be used for appraising the JLP. **Table 1** sets out the key sustainability issues for the District. In line with the requirements of the SEA Regulations, consideration has been given to the likely evolution of the environment in the Districts if the JLP were not to be implemented (see Chapter 3 of the full SA Report). 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 Part 1 Plan. The Part 1 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.

Table 1: Key sustainability issues for Babergh and Mid Suffolk

Key Sustainability Issues
Population, Health and Wellbeing
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.
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.
There are a number of vulnerable people, including people with learning difficulties, who have specialist housing needs (defined as sheltered, extra care, residential care or nursing care).
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).

Key Sustainability Issues
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.
Although BMSDC is not generally deprived, pockets of deprivation exist across the area, with some rural areas being particularly deprived in terms of access.
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.
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.
Economy
There are a number of barriers to economic growth within BMSDC, including educational attainment and a lack of suitable premises for SMEs.
There has been a decline in shopping consumer patterns, with a number of vacant units present in key towns and service centres.
Babergh is not identified as a known destination for business growth, partly because of its geographical location between Ipswich, Colchester and Bury St Edmunds.
There is an uneven distribution of services throughout BMSDC and limited infrastructure in place to support economic development.
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.
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.
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.
Land and Water Resources
BMSDC contains safeguarded mineral resources which, where possible, should not be lost or compromised by future growth.
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.
Due to Babergh and Mid Suffolk having numerous rivers running through their 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.

Key Sustainability Issues
Anglian Water provides for Babergh District and much of Mid Suffolk, whilst Essex and Suffolk Water provides for parts of Mid Suffolk – both districts 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. There are particular areas under significant water stress, such as within the Hartismere Water Resource Zone in north east Mid Suffolk. Here, there are short- and medium- term potable water capacity issues resulting in restrictions upon new non-domestic water supply until 2032. 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.
A growing population and an increase in development will place pressure on wastewater treatment works (WwTWs). Seven WwTWs have been identified in need of upgrade to meet these needs.
A growing population will place increased pressure on waste management facilities and there will be a requirement to meet these growing needs.
Climate Change Adaptation and Mitigation
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, transport trends, and the further deployment of a range of renewables infrastructure.
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.
BMSDC will need to become more resilient to the increased risk of flooding as a result of climate change.
Biodiversity
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.
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.
Historic Environment
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.
Landscape
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.

Method and SA Framework

29. The key sustainability issues for Babergh and Mid Suffolk Districts fed into the identification of a set of SA objectives which are the main tool used at each stage of the SA for assessing the likely effects of the options and draft policies in the JLP. The SA objectives for the JLP are listed below.

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.

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

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

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

SA Objective 7: To conserve soil and mineral resources.

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

SA Objective 9: To reduce contribution 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 11: To conserve and enhance biodiversity and geodiversity.

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.

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.

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

30. The findings of the SA are presented as colour coded symbols showing for the likely effect of each option on each of

the SA objectives along with a concise justification for the effect identified, where appropriate. The colour coding is shown in **Table 2**.

Table 2: Key to SA scoring symbols

Symbol and Colour Coding	Description
++	Significant/major positive effect likely.
++/-	Mixed significant/major positive and minor negative effects likely.
+	Minor positive effect likely.
+/-	Mixed minor effects likely.
++/--	Mixed significant 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.

Sustainability Appraisal Findings for the Joint Local Plan as proposed to be modified

31. The schedule of Main Modifications proposes quite significant changes to the structure and content of the submitted JLP. The current document is presented as the Part 1 Plan, with Part 2 to be prepared at a later date. The Part 1 Plan is divided into two sections:

- Section A: Vision, objectives and strategic policies.
- Section B: Non-strategic local/development management policies.

32. The non-strategic place and allocation policies contained within the submitted JLP are proposed to be removed from the Part 1 Plan. The forthcoming Part 2 Plan is expected to include the settlement hierarchy and any necessary housing allocations as well as settlement boundaries, open space designations and any Gypsy and Traveller site allocations.

The Part 2 Plan will be subject to its own SA process in accordance with legal requirements.

33. The Part 1 Plan comprises a vision and a set of eight objectives covered by four priority areas: housing; economy; environment; and healthy communities and infrastructure. There are 10 strategic policies and 32 non-strategic development management policies. Most of these policies were included in the submitted JLP but have been revised and reworded to varying degrees. There are three new policies proposed for inclusion, one of which is strategic and the other two which are non-strategic.

34. The SA has appraised the JLP as proposed to be modified. **Table 3** below contains a summary of the effects of Section A of the Part 1 Plan, whilst **Table 4** contains a summary of the effects of Section B of the Part 1 Plan.

Table 3: Summary of SA findings for Section A of the JLP as proposed to be modified

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
Vision	++?	+	++?	+	0	0	0	0	++?	0	++?	+	+	++/-?	+	++/-?
Objective 1	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0
Objective 2	+	++	++	0	0	0	0	0	0	0	0	0	0	++	0	0
Objective 3	+	+	+	0	0	0	0	0	0	0	0	0	0	++	0	0
Objective 4	+	0	0	0	+	+	0	0	0	0	++	+	+	0	0	0
Objective 5	0	0	0	0	+	0	0	0	0	++	0	0	0	0	0	0
Objective 6	0	0	0	0	0	0	0	0	++	0	0	0	0	0	0	0
Objective 7	++	++	0	0	+	0	0	+	0	0	0	0	0	0	0	++
Objective 8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Policy SP01 – Housing Needs	+/-	+/-	+	++?	--?	+/-	--	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 SP02 – Affordable Housing	0	0	+	++	0	0	0	0	0	0	0	0	0	0	0	0
Policy SP03 – The Sustainable Location of New Development	+?	+?	++/-?	-?	?	+/-?	?	0	+/-?	?	+	+	+	+	+	+/-?
Policy SP04 – Provision of Gypsy and Traveller and Travelling Showpeople	0	0	0	+	0	0	0	0	0	0	-?	-?	-?	0	0	0
Policy SP05 – Employment Land	+	++	++/-	0	+	++/-	++	0	++/-	0	+	+	+	++	+	++/-
Policy SP06 – Retail and Town Centre Uses	+/-	0	+	0	0	+/-	++?	0	+	0	0	+	+	++	++	+
Policy SP07 – Tourism	0	0	0	0	0	0	0	0	0	0	0	+	+	++	++	0
Policy SP08 – Strategic Infrastructure Provision	++	++	0	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	0	0

Table 4: Summary of SA findings for Section B of the JLP as proposed to be modified

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 Infill Development Outside Settlement Boundaries	+	0	-	+/-	0	-	+	0	-	0	0	+	+	0	0	-
Policy LP02 – Residential Annexes	+	0	0	+	0	0	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	0	0
Policy LP04 – Replacement Dwellings and Conversions	+	0	0	+	0	0	+	0	+	0	0	+	+	0	0	0
Policy LP05 – Rural Worker Dwellings	0	0	+/-	+	0	+/-	0	0	+/-	0	0	0	-?	+	0	+/-
Policy LP06 – Supported and Special Needs Housing	++	0	+	++	0	0	0	0	0	0	0	0	+	0	+	+
Policy LP07 – Community-Led and Rural Exception Housing	+	0	+	++	0	0	-	0	+/-	0	0	0	+/-?	0	0	+
Policy LP08 – Self-Build and Custom-Build	+	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0
Policy LP09 – Supporting a Prosperous Economy	+	+	+	0	0	+/-	?	0	+/-	0	?	+	+	++	?	-
Policy LP10 – Change from Employment Uses	+	0	++	0	0	0	0	0	0	0	0	0	0	++	0	0
Policy LP11 – Retail and Town Centres	+	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 LP12 – Tourism and Leisure	+	0	++	0	0	+/-	0	0	+/-	0	+/-	0	+/-	++	+	+/-
Policy LP13 – Countryside Tourist Accommodation	0	0	0	+	0	0	0	0	0	0	+/-	-	+	+/-	0	0
Policy LP14 – Intensive Livestock and Poultry Farming	+	0	0	0	+/-	+/-	0	+	+/-	0	+/-	0	+/-	++	0	+/-
Policy LP15 – Environmental Protection and Conservation	++	0	0	+/-	++	++	++	++	0	0	+/-	0	0	+/-	0	0
Policy LP16 – Biodiversity and Geodiversity	+	0	0	+/-	0	+	0	0	+	0	++	0	++	+/-	0	+
Policy LP17 – Landscape	0	0	0	+/-	0	0	0	0	0	0	+	+	++	+/-	0	0
Policy LP18 – Area of Outstanding Natural Beauty	+	0	+	+/-	0	+	0	0	0	0	+	+	++	+/-	0	0
Policy LP19 – The Historic Environment	0	0	0	+/-	0	0	+	0	0	0	0	++	+	+/-	0	0
Policy LP20 – Equestrian or Similar Other Animal Land-Based Uses	+	0	+	+	0	+	+	+	+	0	0	0	+	+/-	0	0
Policy LP21 – Agricultural Land to Residential Garden Land	+	0	0	0	0	0	0	0	0	0	+	0	+	0	0	0
Policy LP22 – New Agricultural Buildings	+	0	0	0	0	+/-	0	0	-	0	+	+	+	+	0	+/-
Policy LP23 – Sustainable Construction and Design	+	+	+	+/-	++	++	+	+	++	++	+	0	+	0	0	+

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February 2023

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 LP24 – Design and Residential Amenity	++	0	+	+	0	+	0	+	+	0	++	+	+	+	0	++
Policy LP25 – Energy Sources, Storage and Distribution	+	+	+	0	+	+	0	0	++	0	+	+	+	++	0	0
Policy LP26 – Water Resources and Infrastructure	0	0	0	0	++	0	0	0	0	++	+	0	0	0	0	0
Policy LP27 – Flood Risk and Vulnerability	+	0	0	+	++	0	+	0	0	++	+	+	+	+	0	0
Policy LP28 – Services and Facilities Within the Community	++	++	++	+	0	+	0	0	0	0	0	+	+	+	+	+
Policy LP29 – Safe, Sustainable and Active Transport	++	0	+	0	0	++	0	0	++	0	+	0	0	0	+	++
Policy LP30 – Managing Infrastructure Provision	++	++	++	+	++	0	0	++	+	++	0	0	0	+	+	+/-
Policy LP31 – Health and Education Provision	++	++	++	-	0	+	0	0	+	0	0	0	+	0	0	+
Policy LP32 – Developer Contributions and Planning Obligations	+?	+?	+?	++	+?	+?	0	+?	+?	+?	+?	0	0	+?	0	+?

Overall effects of implementing the JLP as proposed to be modified

35. The overall effects of implementing the JLP as proposed to be modified, taking into account all the policies, are summarised by SA objective below.

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

36. The majority of policies in Section A and Section B of the JLP as proposed to be modified 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 the communities within both Babergh and Mid Suffolk. The housing policies seek to supply the numbers and types of housing required in the area, although it is acknowledged that extant planning permissions provide for the vast majority of each District's housing requirements across the Plan period. The policies place 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.

37. Policies that address environmental protection 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.

38. Overall, it is considered that the JLP as proposed to be modified (the Part 1 Plan) 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

39. Only a small number of the JLP Section A and Section B policies are considered likely to have an effect on SA Objective 2. However, where such effects are identified, they are likely to be positive. The most significant effects are associated with policies that seek to provide the community infrastructure and education facilities required to support new development.

40. Overall, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have 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

41. Over half of the policies in Section A and Section B of the JLP as proposed to be modified are likely to have a positive effect on SA Objective 3. This is because the policies

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. Only four policies are considered likely to have minor negative effects, three of which are mixed with minor positive effects. The negative effects are due to different reasons. Development is supported within existing settlement boundaries where numerous services and facilities are located. However, this may increase pressure on existing services and facilities, particularly in the smaller settlements. Furthermore, some development (e.g. strategic employment sites) is supported outside of the main centres of population, with poor access to services and facilities.

42. Overall, it is considered that the JLP as proposed to be modified (the Part 1 Plan) 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

43. One of the key focal points of the JLP as proposed to be modified 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 the type of home, including affordable homes, and homes for particular needs, such as the elderly. Considerable attention is also placed on the quality of housing provision in terms of design and specifications.

44. As a result, a number of policies in Sections A and B of the JLP as proposed to be modified are likely to have positive effects, and in many instances these effects are considered to be significant. The JLP as proposed to be modified (the Part 1 Plan) does not, however, allocate any new residential sites. The forthcoming Part 2 Plan will instead allocate new residential sites, in addition to establishing the spatial strategy and settlement hierarchy, whilst also addressing the housing needs of Gypsies, Travellers and Travelling Showpeople, and Houseboat Dwellers. The Part 1 Plan is therefore limited in what it can achieve in terms of housing provision to meet local needs. This is despite the identification of a shortfall of 1,191 homes within Babergh District. It is also noted that on some occasions, policies that seek to protect the environment, and similar policies within the JLP as proposed to be modified, could restrict opportunities to develop housing.

45. Therefore, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have a **cumulative significant positive (++/-) effect** on SA Objective 4 (Housing), albeit with uncertainty.

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

46. Water resources and water quality are important issues 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, particularly in the Hartismere Water Resource Zone. In addition, Source Protection Zones have been identified where there is a risk of pollution to drinking water supplies from inappropriate development.

47. 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. Only one policy, LP14 (Intensive Livestock and Poultry Farming), could result in a negative effect against this objective, although this is coupled with a minor positive effect to take into account mitigation.

48. Therefore, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have a **cumulative minor positive (+) effect** on SA Objective 5 (Water).

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

49. 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.

50. The Settlement Hierarchy is not included in the JLP as proposed to be modified and there is no spatial strategy to determine the location of development, as extant planning permissions provide for the majority of housing requirements across the Plan period. The JLP is therefore limited in what it can do in terms of directing development to the most sustainable locations. Although Policy SP03 (The Sustainable Location of New Development) supports development within settlement boundaries, there may not be as many services and facilities in smaller settlements than there are in larger settlements. This may increase reliance on the private car, which could increase associated air and noise pollution.

51. Within Sections A and B of the JLP as proposed to be modified, there is a recognition that air quality is an issue that needs to be taken into account, and a number of policies seek to promote sustainable forms of transport, which are less polluting than combustion engines and likely to become more commonplace during the Plan period. Some of the policies

also seek to mitigate against noise pollution. Therefore, a number of policies are also likely to have positive effects, some of which are significant.

52. Overall, given that there is only one AQMA within the Plan area but a reliance on the private car due to the rural nature of both Districts, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have a **cumulative mixed minor positive and minor negative (+/-) effect** on SA Objective 6 (Air and Noise).

SA Objective 7: To conserve soil and mineral resources

53. Only a small number of the JLP Section A and Section B policies are considered likely to have an effect on SA Objective 7, as this objective is mainly dependent on the location of development and whether it is brownfield or greenfield land, and the JLP as proposed to be modified does not allocate sites for development. However, where effects are identified, they tend to be positive. The committed sites within Babergh and Mid Suffolk mainly comprise greenfield land, although there are a small number of sites on previously developed land.

54. Overall, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have a **cumulative mixed minor positive and minor negative (+) effect** on SA Objective 7 (Soils and Minerals).

SA Objective 8: To promote the sustainable management of waste

55. There are several references to the need for suitable waste management practices in policies in Sections A and B of the JLP as proposed to be modified. For example, Policy LP15 (Environmental Protection and Conservation) supports the re-use of existing resources and seeks to reduce the lifecycle impact of building materials used in construction, in addition to preventing, mitigating and reducing all forms of possible pollution, including waste. Likewise, Policy LP14 (Intensive Livestock and Poultry Farming) supports intensive livestock and poultry units and associated facilities, provided certain criteria are met including provision for the management and disposal of waste materials, liquids, litter and manure for each production cycle.

56. Overall, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have a **cumulative minor positive (+) effect** on SA Objective 8 (Waste).

SA Objective 9: To reduce contribution to climate change

57. Extant planning permissions provide for the majority of housing requirements across the Plan period and the JLP as proposed to be modified does not allocate sites for development. It is therefore limited in what it can do in terms

of locating development in the most sustainable locations so as to reduce reliance on the private car and minimise associated emissions. Although Policy SP03 (The Sustainable Location of New Development) supports development within settlement boundaries, there may not be as many services and facilities in smaller settlements than there are in larger settlements. This may increase reliance on the private car and result in an increase in emissions associated with use of the private car.

58. Climate change is referenced throughout the JLP and there are several policies in Sections A and B of the JLP as proposed to be modified 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.

59. Overall, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have a **cumulative mixed significant positive and minor negative (++) effect** on 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

60. Extant planning permissions provide for the majority of housing requirements across the Plan period and the JLP as proposed to be modified does not allocate sites for development. The plan is therefore limited in what it can do in terms of preventing development in areas at risk of flooding. Most of the committed sites comprise greenfield land and so the scale of development to be delivered may increase flood risk.

61. Few of the Sections A and B 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 wastewater 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.

62. Therefore, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have a **cumulative mixed**

significant positive and minor negative (++) effect on SA Objective 10 (Climate Change Adaptation).

SA Objective 11: To conserve and enhance biodiversity and geodiversity

63. Extant planning permissions provide for the majority of housing requirements across the Plan period and the JLP as proposed to be modified does not allocate sites for development. The plan is therefore limited in what it can do in terms of preventing development in areas containing biodiversity assets.

64. A large proportion of the policies in Sections A and B of the JLP as proposed to be modified 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. Additionally, there are policies with an emphasis on restoration and enhancement with the aim of delivering biodiversity net gain. However, future growth within both Districts could have an adverse effect on biodiversity and geodiversity, particularly where development is supported outside of existing settlement boundaries in more rural and potentially sensitive areas, even where mitigation is proposed.

65. Therefore, overall, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have a **cumulative mixed significant positive and minor negative (++) effect** on SA Objective 11 (Biodiversity and Geodiversity).

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

66. Numerous historic assets are located across Babergh and Mid Suffolk and so it is highly likely that development could affect these assets and their settings. This is reflected in policies in Sections A and B of the JLP as proposed to be modified, which 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.

67. Overall, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have a **cumulative mixed minor positive and minor negative (+/-) effect** on SA Objective 12 (Historic Environment).

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

68. Sections A and B of the JLP as proposed to be modified include a number of very strong 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 which could be adversely affected by the development resulting from the JLP. 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.

69. Overall, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have a **cumulative mixed significant positive and minor negative (++/-) effect** on SA Objective 13 (Landscape/Townscape).

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

70. Policies in Sections A and B of the JLP as proposed to be modified aim to protect and where appropriate expand the existing strategic employment sites, regenerate two strategic employment sites, 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.

71. 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.

72. Overall, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have a **cumulative significant positive (++) effect** on SA Objective 14 (Economic Growth).

SA Objective 15: To revitalise the District's town centres

73. The JLP is limited in what it can do in terms of promoting development within the town centres, as extant planning permissions provide for the majority of housing requirements across the Plan period. A lot of these committed sites are within town centres, but many are not.

74. Sections A and B of the JLP as proposed to be modified 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.

75. Overall, it is considered that the JLP will have a **cumulative significant positive (++) effect** on SA Objective 15 (Town Centres).

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

76. Achieving a marked shift from reliance on the private car to more sustainable modes of transport, particularly public transport, in rural districts is a 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.

77. 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.

78. There is no spatial strategy to determine the location of development within the JLP as proposed to be modified, as extant planning permissions provide for the majority of housing requirements across the Plan period. The JLP is therefore limited in what it can do in terms of locating development in the most sustainable locations where public transport is available and services and facilities are within easy walking and cycling distance.

79. Sections A and B of the JLP as proposed to be modified 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. Although Policy SP03 (The Sustainable Location of New Development) supports growth within existing settlement boundaries, this includes smaller, more isolated settlements. These settlements may not be easily accessible by public transport and therefore increase reliance on the private car. The same applies to the strategic employment sites, many of which are located along the strategic transport corridors within both Districts and so therefore increase reliance on the private car. Some of the policies refer to the provision of transportation infrastructure but which could make travel via the private car more attractive and therefore increase the number of cars on the road.

80. As a result, overall, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have a **cumulative mixed significant positive and minor negative (++) effect** for SA Objective 16 (Sustainable Travel).

Cumulative effects with other plans and projects

81. Chapter 5 In the full Main Modifications SA Report contains a section on the cumulative effects of the JLP as proposed to be modified with development proposed in other plans or projects in Suffolk and in neighbouring authorities.

Monitoring

82. Table 6.1 in the full Main Modifications SA Report sets out suggested indicators for monitoring the potential sustainability effects of implementing the JLP.

Conclusions

83. Overall the SA found that the JLP as proposed to be modified 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), 10 (Climate Change Adaptation), SA Objective 11 (Biodiversity and Geodiversity), SA Objective 13 (Landscape and Townscape), SA Objective 14 (Economy), SA Objective 15 (Town Centres) and SA Objective 16 (Sustainable Travel). In some instances, the SA recognises that the JLP as proposed to be modified may have some negative effects too in relation to 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, that could be used to mitigate such effects. Such issues will need to be considered further in the SA of the forthcoming Part 2 JLP.

84. In summary, therefore, the JLP seeks to accommodate a substantial increase in development, which 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.

LUC

February 2023

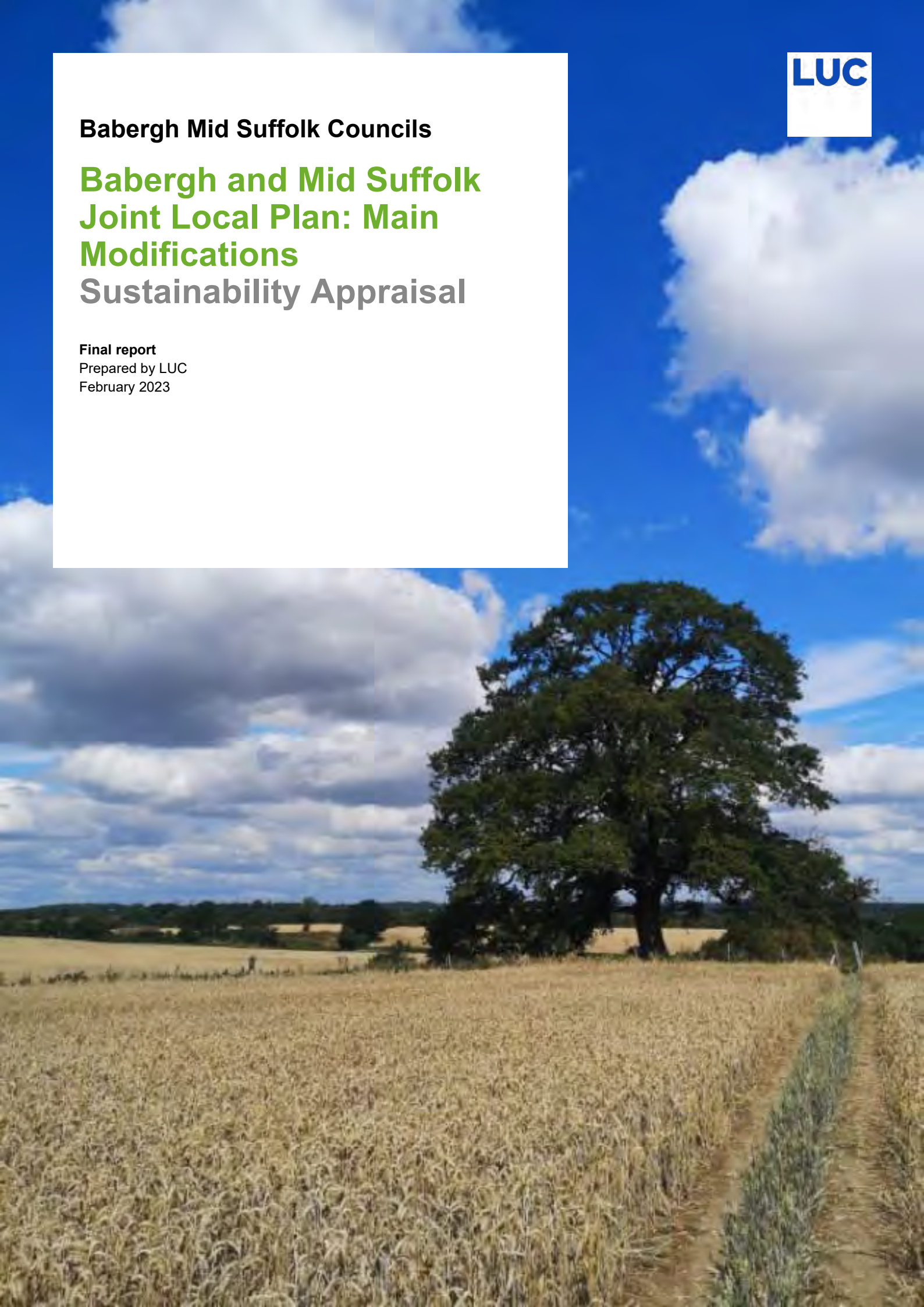
Babergh Mid Suffolk Councils

Babergh and Mid Suffolk Joint Local Plan: Main Modifications Sustainability Appraisal

Final report

Prepared by LUC

February 2023



Babergh Mid Suffolk Councils

Babergh and Mid Suffolk Joint Local Plan: Main Modifications Sustainability Appraisal

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Chapter 1

Introduction

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

1.2 The JLP was submitted for Examination in March 2021 and hearings were held in June, September and October 2021. Following the hearings, the Councils prepared a schedule of proposed Main Modifications to the submitted JLP, working in collaboration with the Inspectors. This Main Modifications SA Report relates to the JLP as proposed to be modified and updates the October 2020 SA Report that was submitted alongside the JLP. As well as setting out the implications of the proposed Main Modifications for the SA, this Main Modifications SA Report summarises the SA work that was carried out prior to submission and during Examination.

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.

The Joint Local Plan

1.5 BMSDC have been preparing a Joint Local Plan 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, while creating healthy communities and protecting the natural and historic environment. Work on the JLP has been ongoing since 2016.

Extant plans for Babergh District

1.6 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

1.7 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.

1.8 The JLP will replace the Local Plans, most of the Saved Policies¹, Core Strategies and the Stowmarket Area Action Plan, and will cover the period 2018-2037.

The Joint Local Plan as proposed to be modified

1.9 BMSDC have prepared a schedule of proposed Main Modifications to the JLP. The schedule proposes quite significant changes to the structure and content of the JLP as submitted. The current document is now presented as the Part 1 Plan, with Part 2 to be prepared at a later date. Part 1 comprises the vision, objectives and strategic policies (Section A) and non-strategic development management policies (Section B). The spatial strategy and non-strategic place and allocation policies are proposed to be removed from the JLP as submitted.

1.10 This is as a result of the Inspectors raising concern over the robustness of the housing site selection process and relationship to the spatial strategy. In Babergh and Mid Suffolk, there is an unusual situation where the vast majority of the Plan area's housing requirement is provided for by existing dwelling completions, sites under construction, sites with full or outline planning permission, sites with a resolution to grant planning permission subject to S106 agreement, allocations in made Neighbourhood Plans and an allowance for windfall dwellings. Therefore, housing delivery is unlikely to be dependent on the allocation of housing sites.

Consequently, to enable the Plan to be found sound, BMSDC propose removing the residential allocations from it and retaining the settlement boundaries shown on the current policies map. While the settlement boundaries are likely to require review and updating through the Part 2 Plan, BMSDC are satisfied for the short-medium term that they will enable the Districts' development needs to be met.

1.11 The forthcoming Part 2 Plan is expected to include the spatial strategy, settlement hierarchy and any necessary housing allocations as well as settlement boundaries, open space designations, and meeting the needs of Gypsies, Travellers and Travelling Showpeople, and Houseboat Dwellers.

1.12 This Main Modifications SA Report relates to the Part 1 Plan only.

1.13 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

1.14 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.

1.15 Under the amended Planning and Compulsory Purchase Act 2004², SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with 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). As set out in the explanatory Memorandum accompanying the Brexit amendments, they are necessary to ensure that the law functions correctly following the UK's exit from the EU. No substantive changes are made by this instrument to the way the Strategic Environmental Assessment (SEA) regime operates. Therefore, the SEA Regulations remain in force and it is a legal requirement for the JLP to be subject to SA and SEA throughout its preparation.

1.16 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

¹ A small number of Saved Policies will remain in place, notably houseboats and any old housing allocations which are not yet built out.

² The Planning and Compulsory Purchase Act 2004 was amended under the Environmental Assessments and Miscellaneous Planning (EU Exit) Regulations 2018.

Guidance³), whereby users can comply with the requirements of the SEA Regulations through a single integrated SA/SEA process – this is the process that is being undertaken in Babergh and Mid Suffolk. From here on, the term ‘SA’ should therefore be taken to mean ‘SA incorporating the requirements of the SEA Regulations’.

1.17 On 11th May 2022, the Government published the Levelling up and Regeneration Bill, which sets out in detail the Government’s proposals for reforming the planning system. Amongst other things, the Bill proposes the replacement of the current SEA regime with a new requirement for an Environmental Outcomes Report. The specific requirements will be set out in forthcoming regulations, along with information about transition arrangements; however, at present the requirement for SEA remains as set out in existing legislation.

1.18 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

1.19 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 again in 2012 and 2017⁴. The currently applicable version is ‘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)’ (hereafter referred to as the ‘Habitats Regulations’). When preparing the Local Plan, the Council is therefore required by law to carry out an HRA, and because it is a separate legal requirement to the SA/SEA, it is being undertaken and reported separately from the SA.

1.20 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.

1.21 The HRA has been undertaken separately but the findings of the latest HRA work for the plan as proposed to be modified are reflected in this Main Modifications SA Report.

Meeting the requirements of the SEA Regulations

1.22 Table 1.1 overleaf signposts the relevant sections of this SA Report that are considered to meet the SEA Regulations requirements.

1.23 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**. 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 has been updated during the SA process as and when data have been published.

Structure of this Main Modifications SA Report

1.24 This chapter has introduced the SA process for the Babergh and 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, including the JLP as proposed to be modified.
- **Chapter 3: Sustainability context for development in Babergh and Mid Suffolk** describes the relationship between the Babergh and 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 Sustainability Appraisal work undertaken** outlines the SA work that was undertaken at earlier stages in the JLP preparation process.
- **Chapter 5: Sustainability Appraisal findings for the JLP as proposed to be modified** summarises the SA

³ 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>

⁴ 3 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).

findings for the policies in the JLP as proposed to be modified, also considering the cumulative effects of the Part 1 Plan as a whole, and with other plans and programmes.

- **Chapter 6: Monitoring** describes the approach that should be taken to monitoring the likely significant effects of the JLP as proposed to be modified and proposes monitoring indicators.
- **Chapter 7: Conclusions** summarises the key findings from the SA of the JLP as proposed to be modified.

1.25 The main body of the report is supported by the following two appendices:

- **Appendix A** presents the consultation comments received in relation to the April 2019 SA Scoping Report and the June 2019 Preferred Options SA Report – both of which were 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 and the updated baseline information for both Districts.

Table 1.1: Meeting the requirements of the SEA Regulations

SEA Regulations' Requirements	Where covered in this SA Report
Environmental Report	
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: ■ implementing the plan or programme; and ■ reasonable alternatives taking into account the objectives and geographical scope of the plan or programme. (Regulation 12(1) and (2) and Schedule 2).	This full SA Report produced to accompany BMSDC's Joint Local Plan as proposed to be modified constitutes the 'environmental report'.
An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.	Chapters 1, 3 and 5 and Appendix 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.	Chapter 5.
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: a. biodiversity; b. population; c. human health; d. fauna; e. flora; f. soil; g. water;	

SEA Regulations' Requirements	Where covered in this SA Report
h. air; i. climatic factors; j. material assets; k. cultural heritage, including architectural and archaeological heritage; l. landscape; and m. the interrelationship between the issues referred to in sub-paragraphs (a) to (l).	
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.	Chapter 5.
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.	Chapters 2 and 5.
A description of the measures envisaged concerning monitoring in accordance with regulation 17.	Chapter 6.
A non-technical summary of the information provided under paragraphs 1 to 9.	A separate Non-Technical Summary has been prepared to accompany this SA Report.
The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of: ■ current knowledge and methods of assessment; ■ the contents and level of detail in the plan or programme; ■ the stage of the plan or programme in the decision-making process; and ■ the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment. (Regulation 12 (3))	Addressed throughout this Main Modifications SA Report.
Consultation	
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. (Regulation 12(5))	Three SA Scoping Reports have been produced and published for consultation in January 2017, April 2019 and March 2020.
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. As soon as reasonably practical after the preparation of the relevant documents, the responsible authority shall: ■ send a copy of those documents to each consultation body; ■ 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"); ■ 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.	Consultation was undertaken in relation to the Regulation 19 Joint Local Plan between November and December 2020. The consultation document was accompanied by the October 2020 SA Report. Consultation is now being undertaken on the schedule of proposed Main Modifications, and this Main Modifications SA Report is being published for consultation alongside the schedule.

SEA Regulations' Requirements	Where covered in this SA Report
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. (Regulation 13 (1), (2), and (3))	
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: ■ notify the Secretary of State of its opinion and of the reasons for it; and ■ supply the Secretary of State with a copy of the plan or programme concerned, and of the accompanying environmental report. (Regulation 14 (1))	Unlikely to be relevant to the Joint Local Plan, as there will be no effects beyond the UK.
Taking the environmental report and results of the consultation into account in decision-making (relevant extracts of Regulation 16)	
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: ■ 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. (Regulation 16(1))	To be addressed after the Joint Local Plan has been adopted.
As soon as reasonably practicable after the adoption of a plan or programme: ■ 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, ■ that the plan or programme has been adopted, and a statement containing the following particulars: ■ how environmental considerations have been integrated into the plan or programme; ■ how the environmental report has been taken into account; ■ 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; ■ how the results of any consultations entered into under regulation 14(4) have been taken into account; ■ the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.	
Monitoring	
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. (Regulation 17(1))	Requirement will be met after adoption of the Joint Local Plan.



 Babergh District

 Mid Suffolk District

 Neighbouring local authority

Chapter 2

Methodology

2.1 In addition to complying with legal requirements, the approach taken to the SA of the Babergh and 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** overleaf 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 and Mid Suffolk JLP, including the JLP as proposed to be modified.

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 1. Identifying other relevant policies, plans and programmes, and sustainability objectives 2. Collecting baseline information 3. Identifying sustainability issues and problems 4. Developing the SA framework 5. Consulting on the scope of the SA
Local Plan Step 2: Production
SA Stages and Tasks
Stage B: Developing and refining options and assessing effects 1. Testing the Local Plan objectives against the SA framework 2. Developing the Local Plan options 3. Evaluating the effects of the Local Plan 4. Considering ways of mitigating adverse effects and maximising beneficial effects 5. Proposing measures to monitor the significant effects of implementing the Local Plan
Stage C: Preparing the Sustainability Appraisal Report 1. Preparing the SA Report
Stage D: Seek representations on the Local Plan and the Sustainability Appraisal Report 1. Public participation on Local Plan and the SA Report 2. (i) Appraising significant changes
Local Plan Step 3: Examination
SA Stages and Tasks
2. (ii) Appraising significant changes resulting from representations
Local Plan Step 4 & 5: Adoption and Monitoring
SA Stages and Tasks
3. Making decisions and providing information
Stage E: Monitoring the significant effects of implementing the Local Plan 1. Finalising aims and methods for monitoring 2. Responding to adverse effects

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 SA 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, and also subject to public consultation.

2.6 Each SA 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 SA Scoping Report prepared by LUC in March 2020 presented the outputs of the following tasks:

- Policies, plans and programmes of relevance to the JLP 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**).
- Baseline information was collected on environmental, social and economic issues in BMSDC. This baseline information provides the basis for predicting and monitoring the likely effects of options and helps to identify alternative ways of dealing with any adverse effects identified (see **Appendix B**).
- Key sustainability issues for Babergh and Mid Suffolk were identified and their likely evolution without the implementation of the JLP were considered (see **Table 3.1** in **Chapter 3**).
- 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 environmental, social and economic considerations. During the SA, the performances of plan options 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 in April 2020 with the three statutory consultees (Natural England, the Environment Agency and Historic England), a number of other stakeholders identified by the Councils and members of the public.

2.9 **Appendix A** 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 subsequent reports. 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. These elements of the Scoping work have since been updated again, with the most recent versions presented in this document.

2.10 The review of plans, policies and programmes and the baseline information are summarised in **Chapter 3**. The full, updated review of plans, policies and programmes and the baseline information are presented in **Appendix B**.

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 NPPF).

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 are also taken into account by plan-makers when selecting preferred options for a plan.

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

2.16 It should be noted that the submitted JLP included an overall spatial strategy policy as well as site allocations, and options for these elements of the JLP were therefore subject to SA throughout the plan preparation process. As this SA report relates to the JLP as proposed to be modified, and the modifications propose the deletion of those elements of the Plan, this section does not describe in detail the work that was undertaken in relation to site and spatial strategy options. More detail on the options covered by the earlier SA work is provided in **Chapter 4** of this SA Report.

Identification and appraisal of options

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

2.18 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.

2.19 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.

2.20 Following on from this stage of 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 Chapters 5, 6 and 7 of the October 2020 SA Report. This includes detailed appraisals of site and spatial strategy options, which were intended to be included in the

JLP at the time. In this Main Modifications SA Report, LUC's appraisal of reasonable alternatives is found in **Chapter 5** and focuses on alternatives to the policy approaches now included in the JLP as proposed to be modified.

Stage C: Preparing the Sustainability Appraisal Report

2.23 This Main Modifications SA Report describes the process that has been undertaken to date in carrying out the SA of the Babergh and Mid Suffolk JLP. The previous iteration of the SA (October 2020) contained an appraisal of alternative spatial strategy options, quantum options and employment site options for inclusion in the JLP, as well as the policies in the JLP itself.

2.24 This Main Modifications SA contains an appraisal of the JLP as proposed to be modified, specifically the Part 1 Plan which comprises the vision, objectives and strategic policies (Section A) and non-strategic development management policies (Section B), as well as reasonable alternatives to those elements of the plan still proposed to be included.

2.25 The focus in each iteration of the SA has been the identification of significant effects, whether positive or negative, in accordance with the SEA Regulations.

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

2.26 BMSDC are inviting comments on the proposed Main Modifications to the JLP, in addition to this Main Modifications SA Report. These documents are being published on the Council's website for consultation during the advertised period.

2.27 **Appendix A** presents the consultation comments received on the April 2019 SA Scoping Report and June 2019 Preferred Options SA Report, both of which were produced by Place Services (see **Chapter 4** for more information on SA work undertaken to date). It also contains the consultation comments that were received on the March 2020 SA Scoping Report, which was produced by LUC.

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 6** sets out suggested monitoring measures for potential negative effects that could arise as a result of the JLP as proposed to be modified (the Part 1 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 2.3** 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.

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 2.3**. 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 The October 2020 SA Report explained the detailed methodology that was used for the appraisal of reasonable alternative site options, including the application of a set of site assessment criteria which related to each SA objective. The schedule of Main Modifications proposes removing all site allocations from the Submitted Plan, with the exception of the designated employment sites listed under Policy SP05 (Employment Land). Therefore, this Main Modifications SA Report does not appraise any site options.

Amendments to the 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. The refinements LUC made are summarised below.

- Two new guide questions were added under SA Objective 9 (Climate Change Mitigation):
 - Will it reduce reliance on the private car through greater accessibility to sustainable modes of transport (e.g. rail, bus and walking)?
 - Will it accommodate electric vehicles?
- Guide questions 10.1, 10.2 and 10.4 under SA Objective 10 (Climate Change Adaptation) were amended to include reference to infrastructure.

2.37 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, and relevant stakeholders. The changes are summarised below.

- The term 'Lifetime Homes' was replaced with 'adaptable homes' in guide question 3.5, as requested by Suffolk County Council (SCC).
- Guide question 7.5 was replaced with "Will the proposals minimise the sterilisation of minerals resources", as requested by SCC.
- Guide question 11.8 was replaced with "Will it ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced?", as requested by Natural England and the Suffolk Wildlife Trust.
- Guide question 11.9 was replaced with "Will it lead to measurable net gain for biodiversity?", as requested by the Suffolk Wildlife Trust.
- Guide question 13.1 was amended to include reference to the setting of the AONBs, as requested by the Suffolk AONB Team.
- Guide question 13.1 was amended to include the question "Will it protect and enhance valued landscapes?", as requested by the Suffolk AONB Team.
- SA Objective 16 was amended to "To enable efficient patterns of movement and modal shift towards sustainable modes of transport", as requested by SCC.
- Guide question 16.2 was amended to "Would it promote the use of sustainable travel modes and reduce dependence on the private car, including enabling the provision or enhancement of public transport in rural areas?", as requested by SCC.

Key to SA effects symbols

2.38 The findings of the SA are presented as colour coded symbols showing an effect for each option against each of the

SA objectives along with a concise justification for the effect given, where appropriate.

2.39 The colour coding is shown in **Table 2.2** below.

Table 2.2: Key to SA symbols

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

Difficulties encountered

2.40 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.

2.41 Most difficulties were encountered early on in the SA process and related specifically to the site options. Sometimes GIS data (e.g. local and neighbourhood centres) or information used to inform certain objectives was not available (e.g. school capacity). The high-level nature of the spatial strategy options was also a challenge, because at times it was difficult to assess in detail the likely effects of the options on each SA objective.

2.42 The appraisal of the three housing needs options under Policy SP01 (Housing Needs) was challenging, as they were all relatively similar and so at times it was difficult to distinguish between the likely effects. This was particularly the case in the absence of quantifiable data identifying a threshold or carrying capacity relating to each SA objective, beyond which effects may be considered to be major. For this reason, the differences between the likely effects of the options are brought out in the text as well as through differences in the headline SA effects shown by the colour coded symbols.

Table 2.3: SA framework

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

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

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

SA objective	Guide Questions	Relevant SEA Topics
	(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? (11.6) Will it help to reverse the national decline in farmland birds? (11.7) Will it protect and enhance sites, features and areas of geological value in both urban and rural areas? (11.8) Will it ensure ecological networks are not compromised, and future improvements are not prejudiced? (11.9) Will it lead to measurable net gain for biodiversity? (11.10) Will it ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced?	
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	(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? (12.2) Will it protect and enhance sites, features and areas of archaeological value in both urban and rural areas? (12.3) Will it enhance accessibility to cultural heritage assets?	Cultural Heritage, Architectural and Archaeological Heritage
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	(13.1) Will it conserve and enhance the AONB and its setting? (13.2) Will it reduce the amount of derelict, degraded and underused land? (13.3) Will it protect and enhance the settlement and its setting within the landscape? / Will it protect and enhance landscape character / Will it protect and enhance valued landscapes?	Landscape Cultural Heritage, Architectural and Archaeological Heritage
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	(14.1) Will it improve business development and enhance competitiveness? (14.2) Will it improve the resilience of business and the economy? (14.3) Will it promote growth in key sectors? (14.4) Will it improve economic performance in disadvantaged areas? (14.5) Will it encourage rural diversification? (14.6) Will it encourage indigenous business?	Population Human Health Material Assets

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

Chapter 3

Sustainability context for development in Babergh and Mid Suffolk

3.1 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

3.2 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.

3.3 During the Scoping stage of the SA, a review was undertaken of the plans, policies and programmes that are relevant to the JLP. The key points are summarised below and the full, updated review can be found in **Appendix B**.

3.4 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.

3.5 It is therefore necessary to identify the relationships between the Babergh and Mid Suffolk JLP and the relevant plans, policies and programmes so that any potential links can be built upon and any inconsistencies and constraints addressed.

Policy context

3.6 It should be noted that the policy context within which the JLP and the SA are being prepared is inherently uncertain given the following key factors:

- **UK economy on the brink of recession** – The UK is set to enter recession in 2023, as a result of the economy contracting by 0.2% in the three months to September 2022 compared with the three months to June 2022⁵. Figures for the most recent three-month period have not yet been released⁶. The potential implications for planning and development include government spending cuts impacting on support available for services and facilities and new infrastructure.
- **COVID-19** – The COVID-19 pandemic has led to far-reaching changes to society in the UK and around the world. Which of these changes will continue in the long term is unknown. However, emerging evidence suggests that there has been an increase in remote working; reduced commuting and related congestion and air pollution; and increased prioritisation of walking and cycling over private transport in towns and cities.
- **Brexit** – Following the UK's departure from the EU on 31st January 2020, it entered a transition period which ended on 31st December 2020. From 1st January 2021, directly applicable EU law no longer applies to the UK and the UK is free to repeal EU law that has been transposed into UK law. Where EU law has been transposed into UK law and not repealed, the relevant UK legislation is still referred to in this Main Modifications SA Report.
- **The Levelling Up and Regeneration Bill**⁷ - Published on 11th May 2022, this Bill introduces a number of reforms to the planning system. It sets out the Government's plan to drive local growth and empower local leaders to generate their areas. The Bill introduces a new Infrastructure Levy, new powers for councils to bring vacant properties back into use, a new approach to environmental assessments, and changes to neighbourhood planning including digitisation of the system.

Key international plans, policies and programmes

3.7 At the international level, there is a wide range of plans and programmes which act to inform and shape national level legislation. Planning policy in England at a national and local level (i.e. the NPPF and Local Plans) should be aware of and in conformity with the relevant legislation.

Key national plans, policies and programmes

3.8 Arguably the most significant national policy context for the Babergh Mid Suffolk JLP 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 and 2021⁸.

3.9 Further revisions to the NPPF were published for consultation in December 2022. The proposals are wide-ranging and include changes that seek to:

- Remove the requirement for Local Planning Authorities to continually demonstrate a deliverable five-year housing land supply, providing the Council's housing requirement, as presented through its strategic policies, is less than five-year years old.
- Allow Local Planning Authorities to meet their area's objectively assessed needs 'as far as possible', rather than as a 'minimum' that is expected through the 2021 version.
- Give greater importance to 'beauty' in design and placemaking, with greater emphasis being given to local design codes.

3.10 Until any further changes to the NPPF are formally made post-consultation, the 2021 document remains applicable.

3.11 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

⁵ Office for National Statistics (November 2022) GDP monthly estimate, UK: September 2022: <https://www.ons.gov.uk/economy/grossdomesticproductgdp/bulletins/gdpmonthlyestimateuk/september2022>

⁶ A recession is defined as when the economy shrinks for two consecutive three-month periods.

⁷ Department for Levelling Up, Housing and Communities (2022) The Levelling Up and Regeneration Bill:

<https://www.gov.uk/government/collections/levelling-up-and-regeneration-bill>

⁸ Ministry of Housing, Communities and Local Government (June 2021) National Planning Policy Framework: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

applications for sustainable development where possible.”

3.12 The NPPF requires local planning authorities to set out the strategic priorities for their area in their 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 and green infrastructure, and planning measures to address climate change mitigation and adaptation.

3.13 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

3.14 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 JLP, 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
- East Suffolk Council
- Ipswich Borough Council
- Tendring District Council
- Colchester Borough Council
- Braintree District Council.

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

Neighbourhood Plans

3.16 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.

3.17 At the time of writing, there were 30 ‘made’ (adopted) Plans within BMSDC. These are as follows:

Babergh

- Aldham Neighbourhood Plan 2018-2036
- Assington NDP 2018-2036
- Bentley NDP 2018-2037
- Boxford Neighbourhood Plan 2021-2037
- Chelmondiston Neighbourhood Plan 2020-2036
- East Bergholt Neighbourhood Plan 2015-2030
- Elmsett Neighbourhood Plan 2017-2036
- Lavenham Neighbourhood Plan 2016-2031
- Lawshall Neighbourhood Plan 2016-2036
- Little Cornard Neighbourhood Plan 2020-2037
- Little Waldingfield Neighbourhood Plan 2018-2036
- Long Melford Neighbourhood Plan 2018-2037
- Newton Neighbourhood Plan 2018-2036
- Whatfield Neighbourhood Plan 2018-2037

Mid Suffolk

- Botesdale & Rickinghall Neighbourhood Plan 2017-2036
- Debenham Neighbourhood Plan 2016-2036
- Drinkstone Neighbourhood Plan 2018-2036

- Eye Neighbourhood Plan 2018-2036
- Fressingfield Neighbourhood Development Plan 2018-2036
- Haughley Parish Neighbourhood Plan 2016-2036
- Laxfield Neighbourhood Plan 2018-2036
- Mendlesham Neighbourhood Plan 2018-2037
- Needham Market Neighbourhood Plan 2020-2037
- Redgrave Neighbourhood Plan 2018-2037
- Stradbroke Neighbourhood Plan 2016-2036
- Stowupland Neighbourhood Development Plan 2016-2036
- Thorndon Neighbourhood Plan 2018-2036
- Thurston Neighbourhood Development Plan 2018-2036
- Wilby Neighbourhood Plan 2018-2036
- Woolpit Neighbourhood Plan 2016-2036.

3.18 In addition, around 35 Neighbourhood Plans are in progress, excluding those which are reviewing originally adopted documents.

Baseline information

3.19 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."

3.20 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 JLP 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.

3.21 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.

3.22 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**.

3.23 To set the context for the SA, a portrait of the two Districts 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 2021 Census their combined population was around 196,100 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. Water stress is a particular issue within the Hartismere Water Resource Zone in north east Mid Suffolk, which has limited available supply headroom. 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

3.24 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."

3.25 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.

3.26 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 JLP 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.

3.27 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 Part 1 Plan. The Part 1 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.

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		
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.	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. 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. Without the Part 1 Plan, 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 Part 1 Plan offers an opportunity for BMSDC to implement policies that support the retention of existing services and facilities, and possibly their expansion and/or improvement, in addition to policies that promote higher energy efficiency standards. The Plan is limited in what it can do in terms of freeing up houses for younger residents, as it will not allocate new residential sites. However, it has the potential to promote the delivery of a mixture of housing types, including ones that better meet the needs of an ageing population.	SA objectives 1, 3, 4.
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.	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. 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	SA objective 4.

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA objectives
	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: ■ sites of 15 dwellings or more or sites of 0.5 hectares and above, in Stowmarket and Needham Market; ■ sites of 5 dwellings or more or sites of 0.17 hectares and above, in the remainder of Mid Suffolk. 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. Without the Part 1 Plan, 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 Part 1 Plan is limited in what it can achieve with regards to affordable housing delivery, as it does not allocate any new housing sites. This is because the Plan area's housing requirement figure is mostly provided for by existing dwelling completions, sites under construction, sites with full or outline planning permission and sites with a resolution to grant planning permission subject to S106 agreement. There is, however, an opportunity for the Plan to contain a policy that requires all future developments to provide a percentage of affordable housing.	
There are a number of vulnerable people, including people with learning difficulties, who have specialist housing needs (defined as sheltered, extra care, residential care or nursing care).	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 Needs Housing) in Babergh's Local Plan Alteration No. 2 encourages planning applications for nursing, residential care, rest homes and sheltered housing. 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. Without the Part 1 Plan, it is likely that specialist housing would still be provided. As was the case in the previous row of this table, the Part 1 Plan is limited in what it can achieve with regards to housing delivery, as it does not allocate any new housing sites. However, the Plan presents an opportunity to support specialist housing delivery through policy wording.	SA objective 4.
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.	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	SA objectives 1, 3 and 14.

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA objectives
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).	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. 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. Without the Part 1 Plan, 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 period⁹. The Part 1 Plan is limited in what it can achieve with regards to distributing development in more sustainable locations. Instead, it will be the role of the Part 2 Plan to establish the spatial strategy and allocate sites for development. The Part 1 Plan does, however, provide 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.	
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.	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. 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) is also relevant.	SA objective 2.

⁹ 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
	Without the Part 1 Plan, infrastructure relating to education is likely to continue to be supported. The Part 1 Plan is unlikely to alter this, as it does not allocate any new development and therefore educational facilities. The Part 1 Plan does, however, present an opportunity for more explicit references to be made to education provision.	
Although BMSDC is not generally deprived, pockets of deprivation exist across the area, with some rural areas being particularly deprived in terms of access.	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 & 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. 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. Without the Part 1 Plan, the aforementioned policies would continue to apply. The Part 1 Plan presents an opportunity address deprivation more head on by ensuring that all indicators of disparity are all addressed. However, the Plan is limited in what it can achieve in terms of regenerating more deprived areas, including through affordable housing delivery, as it does not allocate any new housing sites. As mentioned already however, there is an opportunity for it to contain a policy that requires all future developments to provide a percentage of affordable housing. Through existing strategic employment sites, the Part 1 Plan also provides an opportunity to address employment deprivation, including skills training. The Part 1 will allow for changing circumstances in BMSDC to be more appropriately addressed.	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	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	SA objectives 1 and 3.

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA objectives
and weapons possession have increased.	(Design & Crime Prevention) in the Babergh Local Plan Alteration No. 2 (2006) ensures that development provides for public safety and deters vandalism and crime. 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. Without the Part 1 Plan, it is likely that crime would continue to take place. The Part 1 Plan 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'.	
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.	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. 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. Without the Part 1 Plan, the existing state of affairs is likely to continue. This is because although the Part 1 Plan has the opportunity to protect existing open space, play and outdoor sports facilities, and support the creation of new open space, play and outdoor sports facilities, it will be the role of the Part 2 Plan to, if needed, identify and designate open spaces.	SA objective 1.
Economy		
There are a number of barriers to economic growth within BMSDC, including educational attainment and a lack of suitable premises for SMEs.	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 & Distribution), SD01 (Principal Shopping Area), SD02 (Mixed Use Areas – Business & Service), SD03 (Mixed Use Areas – Shopping & Commerce), SD11 (Industrial Areas) in the Babergh Local Plan Alteration No. 2 (2006) are also relevant. 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	SA objectives 1, 2, 14 and 15.

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA objectives
	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. Without the Part 1 Plan, it is uncertain how the job market might change. The Part 1 Plan offers the opportunity to retain existing strategic employment sites, and promote the rural economy, in addition to supporting improved access and opportunity for all. However, the Part 1 Plan will not allocate new employment sites as this will be the role of the Part 2 Plan.	
There has been a decline in shopping consumer patterns, with a number of vacant units present in key towns and service centres.	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 & Commerce) in the Babergh Local Plan Alteration No. 2 (2006) is also relevant. Saved Policies SA1 (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. Without the Part 1 Plan, 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 Part 1 Plan presents an opportunity to protect and promote the High Street in the key towns and service centres.	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.	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 & Distribution), SD01 (Principal Shopping Area), SD02 (Mixed Use Areas – Business & Service), SD03 (Mixed Use Areas – Shopping & Commerce), SD11 (Industrial Areas) in the Babergh Local Plan Alteration No. 2 (2006) are also relevant. 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. Without the Part 1 Plan, it is likely that Babergh and Mid Suffolk will continue to not be identified as a destination for business growth. The Part 1 Plan presents an opportunity to develop Babergh and Mid Suffolk's reputation as a business growth destination through the retention and expansion of strategic employment sites, although is likely to continue to face competition from other areas with more established	SA objectives 14 and 15.

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA objectives
	reputations, networks and infrastructure. Indeed, the Part 1 Plan does not allocate any new employment sites, as this will be the purpose of the Part 2 Plan.	
There is an uneven distribution of services throughout BMSDC and limited infrastructure in place to support economic development.	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 & Distribution), SD01 (Principal Shopping Area), SD02 (Mixed Use Areas – Business & Service), SD03 (Mixed Use Areas – Shopping & Commerce), SD11 (Industrial Areas) in the Babergh Local Plan Alteration No. 2 (2006) are also relevant. 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. Without the Part 1 Plan, limited additional infrastructure to support economic development will be in place. The Part 1 Plan offers an opportunity to address infrastructure issues across BMSDC and therefore to support economic development.	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.	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. 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. Without the Part 1 Plan, 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 Part 1 Plan presents an opportunity to further address the issue of car dependency by promoting sustainable and active transport and integrating new and more sustainable technologies, as new development is to be	SA objectives 6 and 16.

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA objectives
	provided in BMSDC. However, the Plan is limited in its ability to support sustainable development locations, as it does not allocate any new development sites.	
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.	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. 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. 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. Without the Part 1 Plan, 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 Part 1 Plan 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. However, as mentioned in the previous row, is limited in its ability to support sustainable development locations, as it does not allocate any new development sites.	SA objectives 6 and 16.
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.	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). Recent national policies and the emergence of new technologies are likely to improve air quality, for example, through cleaner fuels/energy sources. Nonetheless, the Part 1 Plan provides an opportunity to contribute to improved air quality in BMSDC through the promotion of alternative travel modes to the motorised vehicle, in line with national policy aspirations. The Plan is limited though, in its ability to support sustainable development, as it does not allocate any new development sites.	SA objectives 13 and 16.
Land and Water Resources		
BMSDC contains safeguarded mineral resources which, where possible, should not be lost or compromised by future growth.	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	SA Objective 7

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA objectives
	neither does Mid Suffolk's Core Strategy (2008) and Local Plan (1998). Without the Part 1 Plan, development will continue to be supported on brownfield land. The Part 1 Plan can help support this but as it will not be allocating any new development sites, it is limited in what it can achieve in terms of addressing this key sustainability issue.	
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.	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, and of trees and woodland". 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. Without the Part 1 Plan, it is likely that development would, in some instances, continue to take place on best and most versatile agricultural land. Although the Part 1 Plan can support the avoidance of development on best and most versatile agricultural land through policy wording, its ability to do this is limited as it does not allocate any new development sites.	SA Objectives 7 and 11.
Due to Babergh and Mid Suffolk having numerous rivers running through their 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.	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. Without the Part 1 Plan, it is likely that rivers and other water sources would continue to not be protected to the extent they should. The Part 1 Plan provides an opportunity to implement policies that protect water quality.	SA objective 5.
Anglian Water provides for Babergh District and much of Mid Suffolk, whilst Essex and Suffolk Water provides for parts of Mid Suffolk – both districts 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	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. Without the Part 1 Plan, future growth could exacerbate the water stress issue. The Part 1 Plan has the potential to appropriately manage water resources in the Hartismere Water Resource Zone until infrastructure upgrades are provided, in addition to securing long term sustainable	SA Objectives 5 and 9.

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA objectives
with droughts. There are particular areas under significant water stress, such as within the Hartismere Water Resource Zone in north east Mid Suffolk. Here, there are short- and medium- term potable water capacity issues resulting in restrictions upon new non-domestic water supply until 2032. 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.	development through policy wording setting out water efficiency standards.	
A growing population and an increase in development will place pressure on wastewater treatment works (WwTWs). Seven WwTWs have been identified in need of upgrade to meet these needs.	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 Part 1 Plan, it is likely that capacity for wastewater treatment will develop as Suffolk County Council is responsible for its provision. However, the Part 1 Plan provides an opportunity to encourage the minimisation of wastewater during construction and the operation of buildings through policy wording.	SA objective 5.
A growing population will place increased pressure on waste management facilities and there will be a requirement to meet these growing needs.	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 Part 1 Plan, it is likely that waste management provision would continue as Suffolk County Council is responsible for its provision. However, the Part 1 Plan still provides an opportunity to promote waste minimisation and recycling initiatives.	SA objective 8.
Climate Change Adaptation and Mitigation		
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	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 ¹⁰ , whilst non-residential developments are expected to achieve a minimum BREEAM standard of 'Excellent'. Policy CS13 (Renewable/Low Carbon	SA Objectives 9 and 16.

¹⁰ Note that the Building for Life Silver Standard is no longer recognised.

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA objectives
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, transport trends, and the further deployment of a range of renewables infrastructure.	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, Saved Policies TP04-TP19 in the Babergh Local Plan Alteration No. 2 (2006) are relevant. 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. Without the Part 1 Plan, 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 Part 1 Plan provides an opportunity to strengthen policies which act positively in terms of climate change, especially those which encourage electric vehicle uptake in place of petrol and diesel fuelled vehicles, and which make provision for renewable energy generation.	
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.	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). Without the Part 1 Plan, extreme weather effects will still take place. However, the Part 1 Plan provides an opportunity to build upon the approach of current policy to better respond to developing circumstances as evidence and techniques to develop.	SA Objective 9.
BMSDC will need to become more resilient to the increased risk of flooding as a result of climate change.	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.	SA Objectives 9 and 10.

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA objectives
	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. Without the Part 1 Plan, 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 Part 1 Plan provides an opportunity, alongside national measures, to mitigate the effects of potential future flooding through flood resilient design.	
Biodiversity		
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.	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. 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. Without the Part 1 Plan, pressures on biodiversity assets are likely to continue due to ongoing pressure for further development and growth. The Part 1 Plan presents an opportunity to update future policy direction such as biodiversity net gain.	SA Objective 11.
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.	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. 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. Without the Part 1 Plan, erosion and fragmentation of habitats and ecological networks could take place through poorly designed development. The NPPF requires Local Plans to include policies to safeguard, restore and create ecological networks at a landscape scale. The Part 1 Plan provides the opportunity to further promote biodiversity gain and to improve the overall ecological network.	SA Objective 11.
Historic Environment		
There are many sites, features and areas of historical and cultural interest in the plan area, a number of which are identified	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	SA Objective 12

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA objectives
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.	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. 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. Without the Part 1 Plan, future growth could harm heritage assets within both Districts. The Part 1 Plan offers an opportunity to ensure that development does not result in adverse effects on the historic environment through detailed policy wording.	
Landscape		
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.	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. 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. Without the Part 1 Plan, it is likely that future development could have an adverse effect on the landscape in both Districts. The Part 1 Plan 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.	SA Objective 13

Chapter 4

Summary of previous sustainability appraisal work undertaken

4.1 The SA process has been going on for over six 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

4.2 BMSDC commenced preparation of the JLP in 2016. There were two rounds of Regulation 18¹¹ 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)

4.3 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 2036¹².

Preferred Options Document (July 2019)

4.4 In July 2019, BMSDC produced a Preferred Options version of the JLP (also Regulation 18). This set out in detail the Councils' preferred spatial strategy 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.

4.5 Following this, there was one round of Regulation 19 consultation on the JLP, as described below.

Pre-Submission Document (November 2020)

4.6 In November 2020, BMSDC produced the Pre-Submission JLP (Regulation 19). The Plan was structured into three sections, as follows:

¹¹ The Town and Country Planning (Local Planning) (England) Regulations 2012 (SI 2012 No. 767).

¹² The plan period has since been changed to 2037.

- Part 1 – Objectives and Strategic Policies
- Part 2 – Non Strategic Delivery Policies
- Part 3 – Non Strategic Place and Allocation Policies.

4.7 Part 1 set out the strategic policies for the area to address BMSDC's priorities for development, in addition to establishing the overall strategy for the pattern of growth and scale, in addition to quality of development. Part 2 included more detailed policies for the management and delivery of development in the right places, and Part 3 contained detailed policies for specific places and neighbourhoods.

4.8 The Pre-Submission JLP (Regulation 19) was submitted for Examination on 31st March 2021.

Examination in Public

4.9 After the Pre-Submission JLP was submitted for Examination, hearing sessions took place in June, September and October 2021. At the Matter 4 (Settlement Hierarchy, Spatial Distribution of Housing and Housing Site Selection Process) hearing session, concern was expressed by the Inspectors over the robustness of the housing site selection process and, thus, the soundness of the sites allocated in the plan and its related spatial strategy. This is as a result of the vast majority of the Plan area's housing requirement figure already being provided for through existing dwelling completions, sites under construction, sites with full or outline planning permission, sites with resolution to grant planning permission subject to S106 agreement, allocations in made Neighbourhood Plans and allowance for windfall dwellings. The Plan's overall housing requirement is therefore unlikely to be dependent on the allocation of the housing sites contained within the submitted plan.

4.10 For the Plan to be found sound, BMSDC propose (through the Main Modifications) the removal of housing site allocations, and retention of the settlement boundaries shown on the current policies map.

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

First stage of SA work

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

SA Scoping Report (2017)

4.13 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)

4.14 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 21st August and 10th November 2017.

4.15 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.

4.16 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)

4.17 In 2019, BMSDC commissioned Place Services to undertake an independent SA of the JLP. Although an internal SA Scoping Report had already been produced, Place Services produced an updated SA 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 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)

4.18 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.

4.19 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.

4.20 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.

4.21 The policies contained within the Regulation 19 JLP were developed from these non-strategic delivery policies (see **Table 4.1** below).

4.22 Overall, the July 2019 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 JLP policies

Regulation 18 Preferred Options JLP (July 2019)	Regulation 19 JLP (November 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

Regulation 18 Preferred Options JLP (July 2019)	Regulation 19 JLP (November 2020)
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
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

4.23 The SA contained an appraisal of 173 sites, 85 of which were allocated in the Preferred Options JLP. SA was also undertaken of 68 sites representing settlement boundary expansions.

4.24 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)

4.25 An SA Addendum was produced by Place Services to amend some details relating to the reasonable alternative site option appraisals contained within the previous iteration of the SA.

Third stage of SA work

LUC's appointment

4.26 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.

4.27 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 were robust and as far as reasonably possible, legally compliant.

4.28 As a result of this review, LUC identified a number of areas where improvements could be made to the SA process. These were reflected in the SA Scoping Report (March 2020). These related primarily to the criteria and assumptions to be used in the SA of potential site allocations. The SA objectives remained unchanged.

SA Scoping Report (March 2020)

4.29 Although two previous SA Scoping Reports had previously been published for consultation, the March 2020 SA Scoping Report was issued to provide an updated economic, environmental and social policy context and baseline information, and to set out a refined method of approach to the SA, drawing on the SA work carried out up to this point. The refined method set out in the SA Scoping Report strengthened the robustness of the SA.

4.30 The key changes to the method of approach related to refinements to the criteria and assumptions used for appraising potential site allocations to be considered for inclusion in the JLP, rather than the SA objectives themselves.

Regulation 19 Pre-Submission SA (October 2020)

4.31 The Regulation 19 Pre-Submission SA Report provided an appraisal of the spatial strategy options, reasonable alternative site options and the vision, objectives, strategic policies, non-strategic policies and allocation policies contained within the JLP.

4.32 The JLP and the Pre-Submission SA Report were submitted for Examination in March 2021 and the hearings held in September 2021.

SA Addendum: Housing Needs Options (March 2022)

4.33 Following the Examination hearings, BMSDC appointed LUC to undertake an SA of three reasonable alternative options for the quantum of housing to be delivered through the JLP. They were:

1. 2020 standard method and JLP figure
 - Babergh: 416 dwellings per annum (7,904 in total)
 - Mid Suffolk: 535 dwellings per annum (10,165 in total)
2. 2021 standard method figure
 - Babergh: 403 dwellings per annum (7,657 in total)
 - Mid Suffolk: 513 dwellings per annum (9,747 in total)
3. High uplift (20%) to 2020 standard method and JLP figure
 - Babergh: 499 dwellings per annum (9,481 in total)
 - Mid Suffolk: 642 dwellings per annum (12,198 in total)

4.34 The SA Addendum concluded that Option 1 performed most strongly out of all three options, as it resulted in the lowest number of negative effects and the highest number of positive effects.

4.35 Consultation responses on the SA work undertaken to date are contained within **Appendix A** of this Main Modifications SA Report.

This stage of SA work

4.36 The JLP was submitted for Examination in March 2021 and hearings were held in September 2021. Following the hearings, the Councils prepared a schedule of proposed Main Modifications. As explained at the start of this report, the schedule of Main Modifications proposes quite significant changes to the structure and content of the JLP.

4.37 This Main Modifications SA Report presents an appraisal of the JLP as proposed to be modified, superseding the October 2020 SA Report and the March 2022 SA Addendum (Housing Needs Options) referred to above. This report presents the SA findings for the reasonable alternatives to those elements of the JLP that are proposed to be retained.

Chapter 5

Sustainability Appraisal findings for the Joint Local Plan as proposed to be modified

5.1 This chapter describes the likely effects of implementing the Joint Local Plan as proposed to be modified, including cumulative effects. It also describes the likely effects of the reasonable alternative policy approaches considered as well as the reasons given by the Councils for choosing the policies in the JLP as proposed to be modified.

5.2 The schedule of Main Modifications proposes quite significant changes to the structure and content of the submitted JLP. The current document is presented as the Part 1 Plan, with Part 2 to be prepared at a later date. The Part 1 Plan is divided into two sections:

- Section A: Vision, objectives and strategic policies
- Section B: Non-strategic local/development management policies.

5.3 The non-strategic place and allocation policies contained within the submitted JLP are proposed to be removed from the Part 1 Plan. The forthcoming Part 2 Plan is expected to include the settlement hierarchy and any necessary housing allocations as well as settlement boundaries, open space designations and any Gypsy and Traveller site allocations. The Part 2 Plan will be subject to its own SA process in accordance with legal requirements.

5.4 The JLP as proposed to be modified (now referred to as the Part 1 Plan) comprises a vision and a set of eight objectives covered by four priority areas: housing; economy; environment; and healthy communities and infrastructure. There are 10 strategic policies and 32 non-strategic development management policies. Most of these policies were included in the submitted JLP but have been revised and reworded to varying degrees. There are three new policies proposed for inclusion, one of which is strategic and the other two which are non-strategic:

- Policy SP04 – Provision for Gypsy and Traveller and Travelling Showpeople¹
- Policy LP05 – Rural Worker Dwellings
- Policy LP14 – Intensive Livestock and Poultry Farming.

5.5 The following policies contained within the submitted JLP are proposed to be deleted:

¹ The content of this policy has partly been carried through from the original version of Policy LP09 – Provision for Gypsy and Traveller and Travelling

Showpeople contained within the submitted JLP, but which is proposed to be removed.

- Policy SP04 – Housing Spatial Distribution
- Policy LP05 – Replacement Dwellings and Additional Dwellings on Sub Divided Plots Within Settlement Boundaries
- Policy LP06 – Mix and Type of Composition
- Policy LP10 – Moorings, Marinas and Houseboats
- Policy LP30 – Designated Open Spaces
- Policy LS01 – Hinterland and Hamlet Sites.

5.6 The SA has appraised the JLP as proposed to be modified (the Part 1 Plan) and the findings are set out in this chapter of the SA. This chapter also includes an appraisal of reasonable alternative policy approaches, where these have been identified and considered by BMSDC in deciding which policy approach to include in the JLP.

5.7 Following the SA of each policy contained within the Part 1 Plan, a section is provided that describes the anticipated cumulative effects of implementing the JLP as proposed to be modified. This is divided into two components:

- The cumulative effects of the policies in the JLP as proposed to be modified as a whole.
- The cumulative effects of the JLP as proposed to be modified with development proposed in other plans or projects in Suffolk neighbouring authorities.

5.8 This chapter also includes the reasons why BMSDC has decided to include the policy approaches in the JLP compared to reasonable alternatives, where applicable.

Section A: SA of vision, objectives and strategic policies

Vision

5.9 This section describes the findings of the SA in relation to the overarching Vision for the Part 1 Plan. The Vision 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. Growth will have occurred embedding the principles of sustainable development, balancing social, economic and environmental issues.

New homes will have been delivered, including affordable housing and housing for an aging 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.

Many communities will have adopted Neighbourhood Plans, adding locally to the decision-making process.

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

5.10 The likely sustainability effects of the Vision and Objectives have been appraised and the results presented in **Table 5.1**.

5.11 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.

5.12 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 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.

5.13 Achievement of the Vision is also likely to result in minor positive effects against SA Objective 2 (Education and Skills), SA Objective 4 (Housing), SA Objective 12 (Historic Environment), SA Objective 13 (Landscape/Townscape) and SA Objective 15 (Town Centres). The effect against SA Objective 4 (Housing) is recorded as minor positive, rather than significant positive, as the JLP as proposed to be modified (the Part 1 Plan) does not allocate any new housing sites. Instead, the forthcoming Part 2 Plan will establish the spatial strategy and allocate new housing sites.

5.14 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), SA Objective 8 (Waste) and SA Objective 10 (Climate Change Adaptation).

5.15 The Vision is unlikely to have any significant negative effects in relation to the SA Objectives.

5.16 All of the effects of the Vision are subject to some uncertainty since their achievement will depend on the details of the strategic and non-strategic policies, which are designed to implement them. The effects of the policies are examined later in the SA report.

Objectives

5.17 The Vision is supported by eight objectives which are set out under four priority areas:

Housing

1. Supporting the delivery of homes, including affordable housing provision.

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 Freeport East and the delivery of Gateway 14, as well as infrastructure improvements that will enable the continued growth of The Port of Felixstowe and strengthen the Districts' links to The Port 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, including through the Ipswich Strategic Planning Area Transport Mitigation Strategy and the Councils' Local Cycling and Walking Infrastructure Plan (LCWIP).
8. To support communities to deliver plans and projects at the district and neighbourhood levels, specifically providing opportunities for the District Councils to support the development of Neighbourhood Plans.

SA findings

Objective 1

5.18 Objective 1 seeks to support the delivery of homes, including affordable housing provision. As the objective aims to support housing delivery, it is expected to have a minor positive effect in relation to SA Objective 4 (Housing). The positive effect is not significant, as the JLP as proposed to be modified (the Part 1 Plan) does not allocate any new housing sites. The Part 2 Plan will instead allocate new housing sites.

5.19 Objective 1 is expected to have a negligible effect against the remaining SA Objectives.

Objective 2

5.20 Objective 2 encourages the development of employment sites and other business growth, of the right type and in the right place. 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).

5.21 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).

5.22 Objective 2 is expected to have a negligible effect against the remaining SA Objectives.

Objective 3

5.23 Objective 3 seeks to encourage inward investment to the Districts by supporting Freeport East and the delivery of Gateway 14 as well as infrastructure improvements that will enable the continued growth of and links to The Port of Felixstowe. Strengthening links to The Port will result in this objective having a significant positive effect against SA Objective 14 (Economic Growth).

5.24 The continued growth of The Port 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).

5.25 Objective 3 is expected to have a negligible effect against the remaining SA Objectives.

Objective 4

5.26 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).

5.27 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).

5.28 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).

5.29 Objective 4 is expected to have a negligible effect against the remaining SA Objectives.

Objective 5

5.30 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).

5.31 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.

5.32 Objective 5 is expected to have a negligible effect against the remaining SA Objectives.

Objective 6

5.33 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).

5.34 Objective 6 is expected to have a negligible effect against the remaining SA Objectives.

Objective 7

5.35 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).

5.36 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.

5.37 Objective 7 is expected to have a negligible effect against the remaining SA Objectives.

Objective 8

5.38 Objective 8 seeks to support communities to deliver plans and projects at the district and neighbourhood levels, specifically providing opportunities for the District Councils to support the development of Neighbourhood Plans. Although this will have beneficial effects on community participation in

planning, it does not directly affect any of the 16 SA Objectives.

Table 5.1: Summary of SA findings for the JLP Vision and Objectives as proposed to be modified

SA Objective	Vision	Objective 1	Objective 2	Objective 3	Objective 4	Objective 5	Objective 6	Objective 7	Objective 8
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
3. To reduce poverty and social exclusion and ensure access to jobs and services.	++?	0	++	+	0	0	0	0	0
4. To meet the housing requirements of the whole community.	++?	+	0	0	0	0	0	0	0
5. To conserve and enhance water quality and resources.	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
7. To conserve soil and mineral resources.	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
9. To reduce contribution to climate change.	++?	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
11. To conserve and enhance biodiversity and geodiversity.	++?	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
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	++?	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
15. To revitalise the Districts' town centres.	++?	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

Policy SP01 – Housing Needs

Prior to submission of the Plan, no alternative options had been put forward, as there was no evidence to suggest that the housing requirement should be set at any level other than the local housing need figure. However, during the Examination hearings the Inspectors requested that further SA work be undertaken in relation to three alternative options for the quantum of housing provision, one of which was the figure included in the submitted JLP. This work is now presented here. The options are:

A. Policy SP01 – Housing Needs: 2020 standard method and JLP figure (JLP Pre-Submission – November 2020)

- Babergh: 416 dwellings per annum (7,904 in total)
- Mid Suffolk: 535 dwellings per annum (10,165 in total)

B. 2021 standard method figure

- Babergh: 403 dwellings per annum (7,657 in total)
- Mid Suffolk: 513 dwellings per annum (9,747 in total)

C. High uplift (20%) to 2020 standard method and JLP figure

- Babergh: 499 dwellings per annum (9,481 in total)
- Mid Suffolk: 642 dwellings per annum (12,198 in total)

The justification text for these options is set out differently to the other policies appraised in that the options are all discussed together by SA objective. Given that under all options, the effects will be determined by the location of development as well as the amount, a sub-section under each SA objective considers the distribution of completions and commitments.

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.	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.	+	++?	-

SA Objective	A.	B.	C.
15. To revitalise the Districts' town centres.	++	++	+++
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	++/-	++/-	+++/-

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

5.39 The development of a large number of new homes under all three options could place increased pressure on existing services and facilities, including hospitals and GPs. However, a large number of new homes could support existing healthcare services and ensure their viability and may facilitate the provision of new healthcare services through increased demand and funding. While Option C may result in the most pressure on existing services and facilities compared to the lower Options A and B, all three options would significantly increase the local population and demand for healthcare facilities. Option C may also offer the most opportunities for funding and delivering new healthcare services to support the growing and existing population.

5.40 New housing developments could involve the delivery of green infrastructure including open spaces, walking and cycle routes, which could benefit public health by facilitating higher levels of physical activity. However, this may be most likely to occur where individual housing developments are large in size, rather than being determined by the overall quantum of housing development across the plan area.

5.41 A higher amount of new housing development under Option C could expose a higher number of existing residents to noise during the construction phase compared to Options A and B although again, a significant amount of new building will also occur under Options A and B, also resulting in potential short-term noise exposure for surrounding residents. With regard to odour concerns, this depends on the specific location of development and its proximity to sources of odour rather than the total amount of development, although again, the more development that occurs, the more likely it is that some new development may be sited close to sources of odour.

5.42 Overall, all three options are expected to have mixed effects for these reasons. Options A and B could have minor positive and negative effects in relation to SA Objective 1 while Option C could have significant positive and negative effects, due to the notably higher amount of development that would occur meaning that effects may be more significant compared to Options A and B.

Completions and commitments

5.43 Existing health-related services and facilities, including GP surgeries and sports and leisure facilities, are located across both Districts in the Market Towns of Hadleigh, Sudbury, Eye, Needham Market and Stowmarket, plus in neighbouring towns – most notably Ipswich. Areas of open space are spread relatively evenly throughout both Districts and are present within the Market Towns and rural areas.

5.44 The extant permissions, recent completions and Neighbourhood Plan allocations are broadly distributed across both Districts but most extant permissions and completions are located in the settlements of Woolpit, Thurston, Elmswell, Stowmarket, Needham Market, Stradbroke and Eye in Mid Suffolk District, and Sudbury and Hadleigh in Babergh District. Many of these settlements contain a number of healthcare services and facilities and therefore although the housing needs options, particularly Option C, may increase pressure on these services, they may also support improvements to existing services and facilities, in addition to the delivery of new ones. However, there are a number of completions and commitments in the rural areas, many of which contain limited health-related amenities or none at all. Therefore, people in these areas are likely to drive elsewhere in order to access healthcare services, with limited opportunities for active travel, particularly under Option C which may result in more development in rural areas. New residents in these more rural areas may, however, support the viability of existing services and facilities. With regard to odour, there are waste recycling centres fairly evenly spread across both Districts. There are a number of completions and commitments within close proximity of these waste recycling centres and which therefore may be adversely affected by odour.

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

5.45 As is the case with health-related services and facilities (see SA Objective 1 above), a large number of new homes being delivered under any of the three options could place increased pressure on schools that may not have the capacity to accommodate new pupils. This is likely to be more of a problem in the smaller settlements in the rural areas because there are no secondary schools located within them meaning that secondary schools elsewhere would have to accommodate the increased demand. However, the delivery

of a large number of new homes could support school expansions and may support the viability of smaller schools in rural areas. Ensuring access to education has the potential to improve qualifications and skills levels amongst residents. Providing fewer new homes under Options A and B, compared to the higher housing figure associated with Option C, could mean that there is more potential to meet the needs of new residents through existing capacity, although the level of housing associated with Options A and B is still significant. However, this cannot be guaranteed.

5.46 Option C is expected to have mixed significant positive and negative effects with uncertainty because it proposes the highest number of new homes and is therefore more likely support school expansions and improvements, when compared to the other two options. However, Option C is also more likely to place increased pressure on existing school capacity due to the high housing target. Options A and B are expected to have minor positive effects in relation to SA Objective 2 because while the housing development proposed by each option may increase pressure on existing services, the educational needs of new residents are more likely to be able to be accommodated under these two options. It is considered that the quantum of development under those options is still great enough that new school provision could be supported. The effects in all cases are recorded as uncertain because the actual effects will depend on the capacity of individual schools and on the distribution of the new housing within the Districts.

Completions and commitments

5.47 Primary and secondary schools are located across both Districts in the Market Towns, whilst many primary schools are located in some of the smaller settlements. A sixth form college is located on the eastern edge of Babergh District and Ipswich contains the University of Suffolk, in addition to some other further education facilities.

5.48 The extant permissions, completions and Neighbourhood Plan allocations are broadly spread across both Districts, including in the smaller settlements. As there are no secondary schools in the smaller settlements, residents would need to drive elsewhere to access a secondary school. However, depending on the school, it may be struggling to accommodate demand. There are completions and commitments located in the Market Towns and around the edge of both Districts by Ipswich, all of which contain educational facilities and may therefore be able to accommodate demand, although this is uncertain as it is dependent on the actual capacity of individual schools. Assuming that the distribution of development under all three options would follow a broadly similar pattern, the effects are likely to remain as described above.

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

5.49 The provision of a large number of new homes could place increased pressure on the availability of job opportunities both within and beyond the Plan area for those who commute outside of both Districts for work. Existing services within both Districts may not have the capacity to accommodate significant residential growth, reducing people's overall accessibility to them. The Ipswich Economic Area Sector Needs Assessment (2017) indicates that both Districts have modest net additional employment land requirements and that there is adequate land to meet the baseline objectively assessed need as proposed in the JLP (Option A). Therefore, Option A is expected to have a minor positive effect in relation to this objective. Option C, which proposes the highest number of new homes, is most likely to have mixed significant effects in relation to SA Objective 3 because although it will provide homes for the working population and may support job creation through an increased labour supply, there is potential it might result in more people needing to commute outside of the Plan area to access job opportunities. A larger number of new homes may also place increased pressure on existing services and facilities. Providing fewer homes has the potential to better ensure access to local jobs, and it is also more likely that existing services and facilities will have the capacity to accommodate new residents' needs. Therefore, Option B is expected to have mixed minor effects. The delivery of new housing may also stimulate the provision of new services and facilities, which may benefit the existing population as well as avoiding existing services becoming overloaded. With regard to poverty and social exclusion, this is dependent on the location of development rather than the amount of development.

Completions and commitments

5.50 Areas considered to be the most deprived according to the Index of Multiple Deprivation are located around the Market Towns of Stowmarket, Sudbury and Hadleigh, in addition to the Ipswich Fringe. These areas, as well as the Market Towns of Eye and Needham Market, contain most of the key services and facilities in both Districts. Because most of the completions and commitments are located in these market town settlements, in addition to the Ipswich Fringe, development that has recently taken place and is likely to take place in the near future under any of the options may help in the regeneration of some of these areas and help sustain existing services. However, some of the completions and commitments are located elsewhere in the rural areas and future development following this pattern would therefore result in some growth not taking place within close proximity of employment opportunities and amenities, particularly under Option C.

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

5.51 All three housing needs options are likely to have significant positive effects in relation to SA objective 4 because they are all based on the standard method for calculating housing need. Therefore, as a minimum, all three options will meet the objectively assessed housing need for Babergh and Mid Suffolk Districts. The effects of Options A and B are recorded as uncertain because unlike Option C, these two options do not incorporate a contingency buffer for delivering housing needs and there may therefore be less certainty about actually delivering all the housing required under those options. Further to this, the supporting text to Policy SP01 (Housing Needs), also referred to as Option A, identifies a shortfall of 1,191 homes in Babergh District. This shortfall will be addressed through the Part 2 Plan. Option C incorporates a contingency buffer of 20% and therefore provides more certainty than the other options in relation to the delivery of housing, particularly affordable housing.

Completions and commitments

5.52 The completions and commitments are distributed relatively broadly across both Districts; therefore, there is no indication that the particular housing needs of any area will not be met under any of the three options.

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

5.53 Water supply is a key issue in both Districts, given that both are prone to drought and that climate change may lead to even more limited water availability in the future, particularly in the summer. Anglian Water is responsible for supplying water to Babergh District and the southern part of Mid Suffolk District, whilst Essex and Suffolk Water is responsible for supplying the northern section of Mid Suffolk District. Anglian Water is split into 28 Water Resource Zones, four of which are within the Babergh and Mid Suffolk District boundaries. As set out in the Water Cycle Study, Anglian Water anticipates that the supply-demand balance will change from a total regional surplus of 150 MI/d in 2020, to a total regional deficit of -30 MI/d by 2025 and -144 MI/d by 2045, should no action be taken. These figures are based on the amount of development proposed within the JLP, namely 416 dwellings per annum in Babergh District and 535 dwellings per annum in Mid Suffolk District. One of the Water Resource Zones within Essex and Suffolk Water, Hartismere, falls within the Mid Suffolk boundary. In the Hartismere Water Resource Zone, the supply surplus is predicted to be maintained across the Plan period provided management controls are in place to maintain the surplus, e.g. through preventing non-domestic uses that require high water use. According to the Water Cycle Study, most areas within both Districts covered by Anglian Water

require infrastructure and/or treatment upgrades to serve a growing population. In the Essex and Suffolk Water area, it is likely that larger development sites and those on the periphery of the network may require some network reinforcement. The same applies with regard to wastewater treatment flow capacity and foul sewerage network capacity.

5.54 Option A is based on the housing figures provided in the JLP and would therefore result in a regional deficit in water supply in the area covered by Anglian Water. Option B provides a similar number of homes to Option A and would therefore also result in a regional deficit in water supply. Option C proposes the highest number of new homes compared to Options A and B and is therefore expected to result in even more of a regional deficit in water supply.

5.55 Groundwater Source Protection Zones help identify high risk areas for pollution. Babergh and Mid Suffolk Districts contain a high proportion of land covered by Source Protection Zone 3, whilst Source Protection Zones 1 and 2 are also present across both Districts. Therefore, it is unlikely that development under any of the three options can avoid the Source Protection Zones. This may be particularly challenging under Option C, which proposes the highest quantum of development. Overall, therefore, all three housing needs options are expected to have major negative but uncertain effects in relation to this SA objective.

Completions and commitments

5.56 The extant permissions, recent completions and Neighbourhood Plan allocations are broadly distributed across both Districts, in the areas supplied by Anglian Water. As such, there is a need for infrastructure and/or treatment upgrades to serve the growing population. Many of the extant permissions, recent completions and Neighbourhood Plan allocations fall within Source Protection Zone 3, whilst a small number of them fall within Source Protections Zones 1 and 2. However, there are some extant permissions, completions and Neighbourhood Plan allocations within Mid Suffolk District that do not fall within any Source Protection Zone. As mentioned already, water resources is a key issue in both Districts and therefore development following a broadly similar pattern is likely to have an adverse effect on this element of SA objective 5, particularly under Option C.

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

5.57 The provision of a large number of new homes under any of the three options will inevitably increase the number of private vehicles on the road, with an associated increase in air pollution. This is particularly the case if development is located outside of the larger settlements and in rural areas, away from everyday amenities and places of work, which would require a high level of car use. In addition, significant new residential

construction could result in existing residents being impacted by noise and construction dust, particularly in the short-term. These potential negative effects may be most pronounced under Option C which proposes the highest quantum of development. However, under all three options, the level of housing growth proposed could also stimulate and fund improvements to public transport infrastructure and green infrastructure to support walking and cycling. As with the potential negative effects, these potential positive effects may be most pronounced under Option C compared to Options A and B. However, it is also acknowledged that the higher housing figure under Option C could also result in more people living in the Districts and commuting longer distances to their place of work beyond the Plan area. It is acknowledged that a large proportion of people in both Districts already commute outside of the Districts to Ipswich and Colchester Boroughs, and to West Suffolk District, and therefore locating housing outside of the key settlements may mean that they cannot easily travel outside of both Districts due to a lack of public transport and so must use the private car. Overall, Option C could have a mix of significant positive and negative effects, while the effects of Options A and B are also mixed but are more likely to be minor.

Completions and commitments

5.58 There is one Air Quality Management Area (AQMA) in the Market Town of Sudbury in Babergh District and pollution levels of NO₂, PM_{2.5} and PM₁₀ are highest along the A140, A14 and A12. Five AQMAs are located in Ipswich Borough and four are located in West Suffolk, three of which are within or close to Bury St Edmunds, at the Babergh and Mid Suffolk border. Due to the fact that there are a number of extant permissions, completions and Neighbourhood Plan allocations in these locations, higher amounts of residential development could exacerbate existing air quality issues and noise pollution in the area, particularly under Option C. A number of extant permissions, completions and Neighbourhood Plan allocations are also located in the rural areas of both Districts and it is therefore likely that residents would need to travel elsewhere in order to reach everyday amenities and workplaces, which would also contribute to use of the private car and associated air pollution.

SA Objective 7: To conserve soil and mineral resources

5.59 Providing a large number of new homes could result in the large-scale loss of greenfield land, some of which may be classed as best and most versatile agricultural land. Indeed, there is a limited amount of brownfield land available for development across the Plan area. Additionally, providing a large number of new homes is also likely to result in more development taking place in Minerals Consultation Areas and so could result in the sterilisation of mineral resources. These effects may be particularly likely under Option C due to the

larger scale of development that would result. Providing fewer homes under Options A and B may still result in the extensive loss of greenfield land as well as development in Minerals Consultation Areas as the scale of new development is still significant.

5.60 With regard to soil resources, both Districts are largely covered by best and most versatile agricultural land, specifically Grade 3 agricultural land (it should be noted that some of this land could be Grade 3b, which would not be considered best and most versatile agricultural land), with some areas of Grade 2 agricultural land. A small area of Grade 1 agricultural land is located in the east of Babergh District, but development could avoid this area of land. With regard to mineral resources, both Districts are largely covered by Minerals Consultation Areas and some mineral extraction sites are also present in both Districts. All three housing needs options are therefore likely to result in a significant scale of development on greenfield land classed as Grade 2 and 3 agricultural land, as well as development within Minerals Consultation Areas, due to the overall scale of development under all options. Therefore, all three options are expected to have major negative effects in relation to this objective.

Completions and commitments

5.61 The extant permissions, completions and Neighbourhood Plan allocations are broadly distributed across both Districts, with most of them falling on Grade 2 and 3 agricultural land (none of them fall on Grade 1 agricultural land). Therefore, it is likely that high quality land would be lost to development under any of the Options but particularly Option C. A large proportion of the completions and commitments also fall within Minerals Consultation Areas but these minerals could be extracted prior to development. It is noted that the centre of Mid Suffolk District does not contain a Minerals Consultation Area and there are a number of extant permissions, completions and Neighbourhood Plan allocations that do not fall within a Minerals Consultation Area. Only a very small number of completions and commitments are located within close proximity of mineral extraction sites.

SA Objective 8: To promote the sustainable management of waste

5.62 An increase in the number of homes in an area will result in a proportionate increase in waste generation. However, this SA objective considers the sustainable management of the waste that is generated, rather than the total volume of waste generation within the Districts. The amount of waste generated and recycled per head in Babergh and Mid Suffolk Districts will not be affected by the total amount of housing development proposed in the Local Plan. The effects of residential development on this objective will be determined by design (e.g. the use of existing materials) and onsite waste

management practices and therefore, all three options are expected to have a negligible effect in relation to this SA objective.

Completions and commitments

5.63 The extant permissions, completions and Neighbourhood Plan allocations are broadly distributed across both Districts. However, for the reasons outlined above, the pattern of development under each of the three options will not have any influence on the sustainable management of waste.

SA Objective 9: To reduce contribution to climate change

5.64 The provision of a large number of new homes is expected to increase the number of private vehicles on the road along with the associated greenhouse gas emissions. This is particularly the case if development is located outside of settlements and in rural areas, away from everyday amenities and places of work. Although new housing growth could also stimulate and fund the creation of new sustainable transport links and improvements to existing sustainable transport links, there is still likely to be a net increase in car use and associated emissions which would be greatest under Option C.

5.65 Increased emissions from car use are likely to be particularly pronounced if residents need to commute longer distances for work. However, it is expected that new housing delivery will result in an increase of investment to help offset some of these impacts. Minor negative effects are therefore likely under each option, although they are in all cases recorded as uncertain because they will depend on the location of development within both Districts and whether contributions are made towards creating and improving sustainable transport links or not.

5.66 With regard to renewable energy, large-scale residential developments are more likely to incorporate renewable energy sources than small-scale residential developments because renewable energy schemes are more financially viable at large sites. However, although the number of homes that would be delivered under each of the three options is known, it is unknown whether these homes would be delivered as part of large-scale or small-scale residential developments. It is also unknown whether high levels of energy efficiency would be achieved as this depends more on the design, scale and layout of development – all of which is determined at planning application stage.

Completions and commitments

5.67 Main services and facilities are located across both Districts in the Market Towns of Hadleigh, Sudbury, Eye, Needham Market and Stowmarket, in addition to a small number of villages. Therefore, people living within close proximity of these towns and/or villages have good access to

these amenities, whilst others do not. However, good road connections enable people living further away to have access to these services, but this requires use of the private car and associated CO₂ emissions. The incorporation of energy efficient design could help reduce greenhouse gas emissions, but this would be determined at planning application stage.

5.68 Because the extant permissions, recent completions and Neighbourhood Plan allocations are broadly distributed across both Districts but many are located in the Market Towns and villages, it is likely that under all three options, people would be located within close proximity to existing services and facilities, which will reduce the need for them to drive elsewhere. There are a number of extant permissions, completions and Neighbourhood Plan allocations in rural areas and therefore residents in these locations will need to travel elsewhere, most likely via private car, for certain amenities. Option C may deliver more development in the rural areas compared to Options A and B due to the overall higher housing figure associated with that option.

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

5.69 The provision of a large number of new homes under any of these three options has the potential to increase flood risk, especially if the development is located within Flood Zones 2 and 3. Additionally, an increase in built development can result in a loss of permeable land, which can increase flood risk more widely. Both Districts contain a number of areas that fall within Flood Zones 2 and 3, particularly associated with the main watercourses and estuaries, which are at a higher risk of flooding. Surface water flooding is also prevalent across both Districts and an increase in housing development would reduce the permeable surfaces available. The NPPF discourages the development of housing within areas at the highest risk of flooding. Development may be able to incorporate surface water management measures, such as Sustainable Drainage Systems to address the existing flood risk as well as that generated by development.

5.70 Option C will deliver the highest number of new homes and will therefore have the most major effects in terms of reducing the permeable surfaces available, putting more places at risk of flooding. Additionally, the larger the housing target, the less selective the Councils can be with regards to allocating sites in areas at lower risk of flooding. Therefore, a major negative effect is expected in relation to SA objective 10 for Option C. Options A and B will deliver a lower number of new homes, although still large-scale, and will therefore not result in as high a loss of permeable surfaces than Option C and it may be more feasible to avoid areas of high flood risk. For this reason, Options A and B are expected to have minor negative effects in relation to SA objective 11. The effects are

all recorded as uncertain because the location of development is largely unknown and the extent of negative effects will also be influenced by the detailed design of developments, including whether sustainable water management measures will be implemented.

Completions and commitments

5.71 All extant permissions, completions and Neighbourhood Plan allocations generally contain land that falls within Flood Zones 2 and 3 and/or which is at risk of surface water flooding. This underlines the fact that a higher housing target delivered broadly in line with the current pattern of completions and commitments may be likely to have major negative effects.

SA Objective 11: To conserve and enhance biodiversity and geodiversity

5.72 The Stour and Orwell Estuaries Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site are located to the south east of Babergh District with the Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) 13km Zone of Influence extending outwards from there and covering the eastern half of Babergh District. The Waveney and Little Ouse Valley Fens SAC is located in the north of Mid Suffolk District, with the Redgrave and South Lopham Fen Ramsar site 5km Zone of Influence extending outwards from there. A number of nationally and locally designated and non-designated biodiversity assets are also found across both Districts, and much of the Plan area is subject to SSSI Impact Risk Zones, where Natural England would need to be consulted on planning applications for development due to their potential impacts on the associated SSSI.

5.73 The larger the housing target, the less selective the Councils can be with regards to locating sites where adverse impacts on biodiversity will be avoided. In addition, a larger housing target would bring more residents to the area, which may result in greater pressure on biodiversity in terms of recreation activities, depletion of water resources and urban effects. Therefore, Option C is expected to have a major negative effect in relation to SA objective 11. The effect is recorded as uncertain because the actual effect will depend more on the specific location and design of housing rather than the overall quantum, and whether it is within or adjacent to biodiversity sites and features. Options A and B also make provision for a large number of homes, although notably fewer homes than Option C. Due to the fact that both options are likely to result in significant amounts of development across both Districts, which both have extensive biodiversity assets including the Stour & Orwell Estuaries SAC, SPA and Ramsar site, and the 13km Zone of Influence, major negative but

uncertain effects are also expected against this SA Objective for these two options.

Completions and commitments

5.74 There are extant permissions and completions generally across every settlement in both Districts, many of which are located within close proximity of the Stour & Orwell Estuaries SAC, SPA and Ramsar site and the RAMS 13km Zone of Influence. This could have a major negative effect on the species these sites are designated for. There are also a number of nationally and locally designated and non-designated biodiversity assets spread across both Districts but mainly in Babergh District and the southern half of Mid Suffolk District along the A14. Extant permissions and recent completions are also located here and it is therefore likely that development that has recently taken place and is likely to take place in the near future under all three options could result in adverse effects on these biodiversity assets.

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

5.75 Designated historic assets including listed buildings, conservation areas, scheduled monuments and registered parks and gardens are spread across both Districts, mainly in the Market Towns and villages, with a notable concentration also along the A14 corridor.

5.76 All three options would involve significant residential development which could occur within close proximity of heritage assets, affecting their setting. However, the lower targets associated with Options A and B would enable the Councils to be more selective about development sites, given the amount of land available in both Districts. Therefore, Options A and B are expected to have minor negative effects in relation to this objective, whilst Option C is expected to have a major negative effect in relation to this objective. All effects are uncertain as they will depend to a great extent on the specific location as well as the design.

Completions and commitments

5.77 The extant permissions and recent completions are broadly distributed across both Districts but most are located in the settlements of Woolpit, Thurston, Elmswell, Stowmarket, Needham Market, Stradbroke and Eye in Mid Suffolk District, and Sudbury and Hadleigh in Babergh District. Each of these towns, with the exception of Thurston and Elmswell, has its own conservation area and all contain a number of listed buildings. Scheduled monuments are also present in Woolpit, Sudbury and Hadleigh, and a registered park and garden is located just outside of Sudbury. Therefore, development broadly in line with this pattern of completions and commitments under all three options has the potential to

adversely effect the historic environment, particularly under Option C.

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

5.78 Two Areas of Outstanding Natural Beauty (AONBs) are located in Babergh District: Dedham Vale AONB and the Suffolk Coast and Heaths AONB. In 2020, the Secretary of State confirmed Natural England's Order to designate three extensions to the Suffolk Coast and Heaths AONB.

5.79 All three options would deliver extensive residential development which could affect the surrounding landscape character. However, the lower targets proposed under Options A and B would enable the Councils to be more selective about housing development sites, given the amount of land available in both Districts, compared to Option C. Therefore, Options A and B are expected to have minor negative effects in relation to this objective, whilst Option C is expected to have a significant negative effect. All effects are uncertain as they will depend more on the precise location and design of individual housing developments than the overall quantum of development.

Completions and commitments

5.80 Development in line with the pattern of extant permissions, completions and Neighbourhood Plan allocations in Mid Suffolk District is not as likely to have adverse effects on the landscape when compared to the pattern of extant permissions, completions and Neighbourhood Plan allocations in Babergh District. This is because there are no AONBs located in Mid Suffolk District. However, due to the fact a number of the extant permissions, completions and Neighbourhood Plan allocations are located in the rural areas of Mid Suffolk District, it is likely that development in accordance with that pattern could have an adverse effect on the landscape, particularly under the highest Option C. There are extant permissions, completions and Neighbourhood Plan allocations located towards the southern edge of Babergh District in Nayland, Stoke-by-Nayland, East Bergholt, Brantham, Stutton and Harkstead, where the AONBs are located. Future development at these settlements is therefore likely to have adverse effects on the landscape, particularly under Option C. Extant permissions, completions and Neighbourhood Plan allocations are also present in the more rural parts of Babergh District, which would also have an adverse effect on the landscape.

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

5.81 The quantum of housing development taken forward in the JLP will influence the achievement of this SA objective by affecting the number of people who are able to access local

jobs. Higher levels of housing development could result in high levels of out-commuting. As discussed under SA Objective 3, the Ipswich Economic Area Sector Needs Assessment indicates that both Districts have modest net additional employment land requirements and that there is adequate land to meet the baseline objectively assessed need as proposed in the JLP (Option A). A minor positive effect is therefore expected for Option A. Option B provides slightly less housing than Option A although still a broadly similar figure and therefore may also have a minor positive effect although this is uncertain as the option could contribute to some increase in out-commuting. Option C is expected to have a minor negative effect because it provides the highest number of new homes which may be most likely to lead to high levels of out-commuting.

Completions and commitments

5.82 The extant permissions, completions and Neighbourhood Plan allocations are distributed relatively broadly across both Districts; therefore, there is no indication that the particular employment needs of any area will not be met under any of the three options. Any over-delivery of housing in comparison to jobs under Option C in particular would affect the whole Plan area.

SA Objective 15: To revitalise the District's town centres

5.83 The provision of a large number of new homes has the potential to increase footfall in both town and district centres, particularly if development is located within these settlements. This could help decrease the number of vacant units present in town and district centres and could therefore help enhance the vitality and viability of these centres.

5.84 Option C proposes the largest number of new homes out of all three options and is therefore likely to result in the largest increase in footfall in town and district centres. Option C is therefore expected to have a significant positive effect in relation to SA objective 15. Options A and B are expected to have minor positive effects in relation to SA Objective 15 because they do not propose as large a number of new homes as Option C and will therefore not result in as large an increase in footfall. The effects are recorded as uncertain because they are dependent on the location in which development takes place, in particular its proximity to town and district centres.

Completions and commitments

5.85 Town centres in the Plan area include Stowmarket, Sudbury and Hadleigh, whilst Neighbourhood Plans have defined retail areas (equivalent to the District Centres previously defined at district level) at Debenham, Eye and Needham Market. As discussed previously, the extant permissions, completions and Neighbourhood Plan allocations

are distributed relatively broadly across both Districts but most are located in the settlements of Woolpit, Thurston, Elmswell, Stowmarket, Needham Market, Stradbroke and Eye in Mid Suffolk District, and Sudbury and Hadleigh in Babergh District. Therefore, three of the settlements in which most of the completions and commitments are classed as town centres, whilst one of them is a defined retail area in a Neighbourhood Plan. As such, it is likely that development following the pattern that has recently taken place and is likely to take place in the near future will increase footfall within these town and district centres, particularly under Option C.

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

5.86 The provision of a large number of new homes has the potential to increase the number of private vehicles on the road, particularly if development is located outside of settlements and in rural areas where there is limited public transport and people are not within easy walking or cycling distance of everyday amenities and places of work. The location of development is important in enabling efficient patterns of movement because if development is located within large settlements where there are a number of services and facilities and places of work, people can easily walk and cycle to reach these amenities. It is also likely that there will be better access to public transport in larger settlements compared to smaller settlements and rural areas. A high quantum of housing could result in high levels of commuting over longer distances to surrounding districts when compared to a low quantum of housing, particularly because many people in both Districts commute outside of the Districts to work.

5.87 The large-scale residential development that would occur under all three options would inevitably result in an increase in vehicle traffic; however it may also stimulate improvements in public transport links and services through increased demand, and help to fund new sustainable transport infrastructure. A number of people in both Districts commute outside of the Districts to Ipswich and Colchester Boroughs, and to West Suffolk District for work and it is acknowledged in the Ipswich

Economic Area Sector Need Assessment that both Districts have modest net additional employment land requirements. It is therefore unlikely that any of the three options would result in significant increases in out-commuting as levels are already high. Additionally, there is adequate land to meet the baseline objectively assessed need as proposed in the JLP (Option 1). Seeing as Option B proposes a similar number of homes to Option A, both options are expected to have mixed minor effects. Option C is expected to have mixed major effects because it proposes the largest number of new homes and is therefore more likely to result in the greatest increase in vehicles on the road when compared to Options A and B. However, Option C is also more likely to facilitate improvements in more active and sustainable transport links due to the scale of development it proposes. All effects are recorded as uncertain because contributing to a modal shift towards sustainable modes of transport is also reliant on the location of development.

Completions and commitments

5.88 Many of the extant permissions and recent completions are located within the settlements of Woolpit, Thurston, Elmswell, Stowmarket, Needham Market, Stradbroke and Eye in Mid Suffolk District, and Sudbury and Hadleigh in Babergh District. Stowmarket, Needham Market and Sudbury contain their own train stations and therefore people can easily travel within and outside of both Districts for work (e.g. to Ipswich), by a sustainable means of transport. Bus stops are relatively evenly spread across both Districts but most are located within the settlements where many of the extant permissions and Neighbourhood Plan allocations are located, and which provide frequent bus service compared to elsewhere. These settlements also contain a number of services and facilities when compared to elsewhere and therefore people can easily access these local services and facilities via walking and cycling. It is therefore likely that future development following a similar pattern to the extant permissions and recent completions will help promote more sustainable and active transport modes.

Policy SP02 – Affordable Housing

A. SP02 – Affordable Housing.

B. Lower than the on-site affordable housing need requirement to the SHMA level.

SA Objective	A.	B.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	0	0

SA Objective	A.	B.
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.	++	+/-
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

5.89 According to Policy SP02 (Affordable Housing), the JLP (Parts 1 and 2) will assist to deliver 2,096 affordable dwellings in Babergh District and 2,428 affordable dwellings in Mid Suffolk District up to 2037. This represents 27% and 24% of the total housing need requirement for the Districts, respectively.

5.90 Policy SP02 sets out the proportion of affordable housing that must be provided is 35% for sites of ten or more dwellings or 0.5ha or more on greenfield sites, whilst a contribution of 25% is required for brownfield sites. According to the policy, the mix, type, and size of new affordable housing across the Plan area for new affordable housing must have regard to the relevant district needs assessment or any local housing needs survey. 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).

5.91 A minor positive effect is expected against SA Objective 3 (Accessibility) as the policy states that affordable housing must be well-designed and where other types of housing are delivered it must be integrated within the development. This will minimise inequality and issues of social exclusion.

5.92 Negligible effects are expected against the remaining SA Objectives.

Option B: Lower than the on-site affordable housing need requirement to the SHMA level

5.93 Option B would deliver a lower amount of on-site affordable housing than is set out in the SHMA. Therefore, although this option would achieve 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).

5.94 A minor positive effect is expected in relation to SA Objective 3 (Accessibility) for the same reason given under preferred Option A.

5.95 Negligible effects are expected against the remaining SA Objectives.

Discounted alternative options

- **Option B: Lower than the on-site affordable housing need requirement to the SHMA level:** It is not considered appropriate to lower the affordable housing requirement as this would not be likely to deliver the identified district volume of affordable housing overall (not every site contributes to affordable housing). Viability is built into the policy to enable flexibility in exceptional circumstances.

Policy SP03 – The Sustainable Location of New Development

A. Policy SP03 – The Sustainable Location of New Development.

No alternative options have been put forwards, as the existing settlement boundaries have been in place for some time and are well-understood. The Part 2 Plan will involve a comprehensive review of settlement boundaries.

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.	+/-?
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 –The Sustainable Location of New Development

5.96 This policy states that new housing development will come forward through extant planning permissions, allocations in made Neighbourhood Plans, windfall development in accordance with the relevant policies of the Plan and any allocations which are made in the forthcoming Part 2 Plan.

5.97 The policy goes on to state that development will be supported within the defined settlement boundaries as defined on the Policies Map. Outside of the defined boundaries, development will only be permitted where it meets the criteria listed in the policy.

5.98 In accordance with the policy wording, the settlement boundaries will be reviewed, and if necessary revised as part of the preparation of the Part 2 Plan. Policy SP03 is therefore recorded as having uncertain effects on all of the SA objectives.

5.99 Supporting development within the settlement boundaries is likely to have a mixed significant positive and minor negative effect on SA Objective 3 (Accessibility), as the focus on development in existing settlement boundaries will ensure that people can easily access services and facilities. However, it may also place pressure on existing services and facilities, particularly amongst the smaller settlements where viability may be an issue, although this is uncertain. Minor positive effects are expected in relation to SA Objective 1 (Health and Wellbeing) and SA Objective 2 (Education and Skills), as existing settlements are more likely to contain existing health, sport and leisure facilities, as well as schools and work opportunities. Therefore, supporting development within these settlements will ensure people are within close proximity of numerous services and facilities.

5.100 A minor negative effect is anticipated against SA Objective 4 (Housing), as the policy supports development within the settlement boundaries and not outside of them,

which could result in adverse effects on housing delivery. This is because there may be limited space for development within the existing settlement boundaries as opposed to outside the settlement boundaries.

5.101 However, the constraints against development outside of 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).

5.102 A mixed minor positive and minor negative effect is expected in relation to SA Objective 16 (Sustainable Transport), as although supporting development within settlement boundaries where services and facilities are located should minimise the need to travel elsewhere by private car, this policy also supports development in smaller, more isolated settlements where it may still be necessary to travel elsewhere to reach amenities. Mixed minor positive and negative effects are also expected in relation to SA Objective 6 (Air and Noise) and SA Objective 9 (Climate Change Mitigation), as use of the private car increases emissions, whilst also having adverse effects on air quality and noise pollution.

5.103 Minor positive effects are expected against SA Objective 14 (Economy) and 15 (Town Centres) as additional development within existing settlements should enhance the viability and vitality of the Districts' centres and promote economic growth, by supporting clusters of high-value activity.

5.104 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 that come forwards.

5.105 Negligible effects are expected against the remaining SA Objectives.

Policy SP04 – Provision for Gypsy and Traveller and Travelling Showpeople

A. Policy SP04 – Provision for Gypsy and Traveller and Travelling Showpeople

No alternative options have been put forwards, as the preferred approach is based upon National Planning Policy for Traveller Sites (2015) which requires planning authorities to use their evidence to plan positively to meet the needs of Gypsies, Travellers and Travelling Showpeople.

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

SA Objective	A.
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 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.	0

Option A: Policy SP04 – Provision for Gypsy and Traveller and Travelling Showpeople

5.106 Policy SP04 (Provision for Gypsy and Traveller and Travelling Showpeople) supports proposals for the development of sites for Gypsies, Travellers and Travelling Showpeople within or outside settlement limits, where they accord with the Planning Policy for Traveller Sites and Policy SP09(2). The Policy also sets out that sites with permission for these uses or in current use, will be protected for these uses unless it can be demonstrated they are no longer required to meet the District-wide need. Therefore a minor positive effect is expected against SA Objective 4 (Housing).

5.107 Uncertain minor negative effects are expected against SA Objective 11 (Biodiversity and Geodiversity), SA Objective 12 (Historic Environment) and SA Objective 13 (Townscape/Landscape), as the Policy supports proposals for the development of sites outside settlement boundaries, as well as within. This has the potential for adverse effects on the natural and built environment, as well as the landscape depending on the specific location and design.

5.108 Negligible effects are expected against the remaining SA Objectives.

Policy SP05 – Employment Land

A. Policy SP05 – Employment Land.

No alternative options have been put forwards, 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 amendments to the Use Classes 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.	+
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 SP05 – Employment Land

5.109 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, while also supporting their expansion. The policy specifically states that 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.

5.110 A large proportion of the strategic employment sites are located within, on the edge of or close to the Market Towns. Therefore, it is likely that their expansion will result in an increase in people working within 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).

5.111 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.

5.112 The main exceptions to this are: the strategic employment site at Acton Place, which is an isolated industrial estate, one mile from Acton, 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, 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.

5.113 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.

5.114 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.

5.115 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).

5.116 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 Sroughton 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.

5.117 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

Sroughton 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).

5.118 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 CO₂ emissions. Despite this, the policy states that all proposals must ensure provision of accessibility to public transport, including walking and cycling provision. Therefore, mixed significant positive and minor negative effects are 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).

5.119 Finally, a minor positive effect is expected in relation to SA Objective 5 (Water), as any application for non-domestic proposals requiring heavy water usage will be required to demonstrate that sufficient water capacity is available through a Water Supply Management Statement in liaison with the relevant water supply company.

5.120 Negligible effects are expected against the remaining SA Objectives.

Policy SP06 – Retail and Town Centre Uses

A. Policy SP06 – Retail and Town Centre Uses.

No alternative options have been put forwards, as the preferred approach is based upon NPPF definitions and evidence (Babergh and Mid Suffolk Retail and Town Centre study, 2017), and considered in accordance with the 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

SA Objective	A.
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 and Town Centre Uses

5.121 Policy LP06 (Retail and Town Centre Uses) supports proposals for new main town centre uses within the town centres of Sudbury, Hadleigh and Stowmarket (as defined on the Policies Map), and other retail centres that are defined in made Neighbourhood Plans. This will help to maintain the vitality and viability of existing town centres and main town centre uses, and also help to revitalise town centres, thereby having beneficial effects on the economy. Significant positive effects are therefore 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 supporting development within town centres ensures services and facilities are easily accessed by public and active transport modes. The development of new main 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.

5.122 A potential but uncertain significant positive effect is identified 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.

5.123 A minor positive effect is expected in relation to SA Objective 16 (Sustainable Travel) because Policy SP06 promotes new uses within town centres, which are more easily

accessible via public transport, in addition to walking and cycling. This is likely to reduce reliance on the private car and associated CO₂ emissions. Therefore, a minor positive effect is also expected in relation to SA Objective 9 (Climate Change Mitigation).

5.124 Mixed minor positive and minor negative effects are 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 higher existing pollution levels are found and therefore concentrating development in town centres could have adverse effects on people's health.

5.125 Minor positive effects are expected in relation to SA Objective 12 (Historic Environment) and SA Objective 13 (Landscape/Townscape) because the policy seeks to protect and enhance the historic environment, requiring development proposals to demonstrate the different ways in which that they have been designed with the heritage assets, with consideration also given to their setting and the townscape. 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).

5.126 Negligible effects are expected against the remaining SA Objectives.

Policy SP07 – Tourism

A. Policy SP07 – Tourism.

No alternative options have been put forwards, as the policy is supportive of this important economic sector, compliant with the 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.	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 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

5.127 Policy SP07 (Tourism) promotes new sustainable tourism development that supports the tourism role of the settlements across Babergh and Mid Suffolk. 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).

5.128 Minor positive effects are expected in relation to SA Objective 12 (Historic Environment) and SA Objective 13 (Landscape/Townscape) because Policy SP07 states that historic, recreational and landscape-based tourism proposals that demonstrate protection of the historic and natural environment will be supported.

5.129 Negligible effects are expected against the remaining SA Objectives.

Policy SP08 – Strategic Infrastructure Provision

A. Policy SP08 – Strategic Infrastructure Provision.

No alternative options have been put forwards, as the policy is based on evidence, considered to be in accordance with the NPPF, supports infrastructure delivery 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.	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.	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 SP08 – Strategic Infrastructure Provision)

5.130 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 projected population growth.

5.131 Policy SP08 states that strategic infrastructure project areas will be identified that protect Habitat Mitigation Zones. Therefore, a significant positive effect is also expected in relation to SA Objective 11 (Biodiversity and Geodiversity).

5.132 The Policy makes reference to infrastructure for transport, including sustainable transport modes, along the strategic transport corridors, including the delivery of the ISPA Transport Mitigation Strategy, to avoid and mitigate any adverse effects, and achieve net environmental gains. However, it is likely that the provision of transportation infrastructure 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 CO₂ emissions. Particularly, development in the ISPA is predicted to add significant strain on the transport network. However, the policy does note that strategic infrastructure provision will include sustainable transport modes, and a ISPA Transport Mitigation Strategy will be introduced to reduce vehicle movements arising from new development and existing communities, and address air quality impacts in and

around Ipswich. An emphasis on the delivery of sustainable transport modes has the potential to achieve net environmental gains. Mixed minor positive and uncertain minor negative effects are therefore anticipated against SA Objective 16 (Sustainable Travel), SA Objective 6 (Air and Noise) and SA Objective 9 (Climate Change Mitigation).

5.133 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 and expansions to electronic communication networks and high-quality digital infrastructure will be made.

5.134 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. Therefore, a significant positive effect is expected in relation to SA Objective 1 (Health and Wellbeing).

5.135 A minor positive effect is also expected against SA Objective 5 (Water) because the policy states that upgrades from 2032 will be made to the Hartismere water supply infrastructure network.

5.136 It is not stated whether strategic infrastructure includes Sustainable 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).

5.137 Negligible effects are expected against the remaining SA Objectives.

Policy SP09 – Enhancement and Management of the Environment

A. Policy SP09 – Enhancement and Management of the Environment.

No alternative options have been put forwards, as the alternative would be not putting a strategic approach in place. However, a Recreational Disturbance Avoidance and Mitigation Strategy policy approach is a far more efficient and coordinated approach to the problem. The policy is based on evidence and is considered in accordance with the 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 townscape.	++

SA Objective	A.
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

5.138 Policy SP09 (Enhancement and Management of the Environment) requires proposals to support and contribute to conservation, 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). With regard to new development, when it falls within the Protected Habitats Sites Mitigation Zone it should seek to avoid harm in the first instance. Where this is not possible, development will be required to demonstrate adverse effects on site integrity will be avoided from increased recreational pressure. Development will also be required to make appropriate contributions through legal 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 HRA. Reference is also made in the policy to biodiversity net gain, with a requirement for all developments to protect and enhance biodiversity, to ensure that the network of

habitats and green infrastructure is more resilient to current and future pressures.

5.139 Policy SP09 supports environmental protection measures, including mitigating, adapting and responding to the effects of climate change, with reference made to SuDS. Therefore, this policy is expected to have minor positive effects in relation to SA Objective 10 (Climate Change Adaptation), SA Objective 5 (Water), and SA Objective 7 (Soils and Minerals). The effects are recorded as uncertain because the policy does not make specific reference to these measures.

5.140 A minor positive effect is expected against SA Objective 6 (Air and Noise), because the policy requires monitoring of air quality from traffic on roads within 200 metres of Protected Habitat Sites. Where these demonstrate an adverse effect on their integrity, then the Councils will commit to an immediate review of the planning policies to address any mitigation measures required. A minor positive effect is therefore also expected against SA Objective 9 (Climate Change Mitigation) because the policy seeks to enhance and manage the natural environment, which includes open spaces and the countryside, which will help absorb CO₂ emissions present within the atmosphere.

5.141 Negligible effects are expected against the remaining SA Objectives.

Policy SP10 – Climate Change

A. Policy SP10 – Climate Change.

No alternative options have been put forwards. In order to future proof development in both 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.

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.	+?

SA Objective	A.
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.	++
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

5.142 Policy SP10 (Climate Change) requires all development to mitigate and adapt to climate change. As stated in the supporting text to the policy, the transition to a low carbon future in a changing climate will be supported, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity, landscape and visual impacts, the risk of extreme winter and summer temperatures, and overheating from rising temperatures.

5.143 Policy SP10 requires the application of existing and innovative approaches to sustainable design and construction, in addition to the identification of opportunities, where appropriate, to deliver decentralised energy systems powered by a renewable or low carbon source and associated infrastructure, including community-led initiatives. This could help reduce any air pollution that previously may have occurred from non-renewable energy sources. According to the policy, proposals should adopt a sequential risk-based approach taking into account future-proofing measures for impacts of flooding. The policy also states that proposals must conform to the principle of Holistic Water Management. 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 6 (Air and Noise) and 13 (Landscape/Townscape). An uncertain

minor positive effect is expected against SA Objective 11 (Biodiversity and Geodiversity), as sustainable construction techniques to mitigate and adapt to climate change could include biodiversity net gain, and building temperature regulation, although this is not specifically referenced in the policy.

5.144 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.

5.145 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.

5.146 Negligible effects are expected against the remaining SA Objectives.

Summary of SA findings for Section A: Strategic Policies

5.147 Table 5.2 below shows all the SA effects for Section A of the JLP as proposed to be modified (the Part 1 Plan).

Chapter 5
Sustainability Appraisal findings for the Joint Local Plan as proposed
to be modified
Babergh Mid Suffolk Joint Local Plan: Main Modifications
February 2023

Table 5.2: Summary of SA findings for Section A of the JLP as proposed to be modified

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	+/-	+/-	+	++?	--?	+/-	--	0	-?	-?	--?	-?	-?	+	++?	+?/-?
Policy SP02 – Affordable housing	0	0	+	++	0	0	0	0	0	0	0	0	0	0	0	0
Policy SP03 – The Sustainable Location of New Development	++?	++?	++/-?	-?	?	+/-?	?	0	+/-?	?	++?	++?	++?	++?	++?	+/-?
Policy SP04 – Provision of Gypsy and Traveller and Travelling Showpeople	0	0	0	+	0	0	0	0	0	0	-?	-?	-?	0	0	0
Policy SP05 – Employment Land	+	++	++/-	0	+	++/-	++	0	++/-	0	+	+	+	++	+	++/-
Policy SP06 – Retail and Town Centre Uses	+/-	0	+	0	0	+/-	++?	0	+	0	0	+	+	++	++	+
Policy SP07 – Tourism	0	0	0	0	0	0	0	0	0	0	0	+	+	++	++	0
Policy SP08 – Strategic Infrastructure Provision	++	++	0	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	0	0

Section B: SA of non-strategic policies

Local Policies - Housing

Policy LP01 – Windfall Infill Development Outside Settlement Boundaries

A. LP01 – Windfall Infill Development Outside Settlement Boundaries

No alternative options have been put forwards, 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.	-
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.	+
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 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 LP01 – Windfall Infill Development Outside Settlement Boundaries

5.148 Policy LP01 (Windfall Infill Development Outside Settlement Boundaries) supports windfall development outside settlement boundaries subject to certain criteria. The promotion of windfall development outside settlement boundaries where there is a nucleus of at least 10 well related dwellings 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, as development would be for only one or two dwellings. Therefore, a mixed minor positive and minor negative effect is expected against SA Objective 4 (Housing).

5.149 A minor positive effect is expected in relation to SA Objective 7 (Soils and Minerals) because the policy supports infill development, and this is unlikely to take place on agricultural land.

5.150 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. 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).

5.151 Development outside settlement boundaries 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).

5.152 The increased reliance on use of private car may have a minor negative effect in relation to SA Objective 9 (Climate Change Mitigation) due to any associated increase in CO₂ emissions. This could have adverse effects on air quality and therefore a minor negative effect is also expected in relation to SA Objective 6 (Air and Noise).

5.153 Negligible effects are expected against the remaining SA Objectives.

Policy LP02 – Residential Annexes

A. Policy LP02 – Residential Annexes.

No alternative options have been put forwards, 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.	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 LP02 – Residential Annexes

5.154 Policy LP02 (Residential Annexes) supports proposals for residential annexes, provided they are ancillary and subordinate in scale to the host dwelling, do not involve the physical subdivision of the residential curtilage, and are designed in a way that enables them to be later integrated into the main building as a single dwellinghouse when the need no longer exists. The supporting text to the policy states that an annexe can create additional accommodation for a dwelling

and can help to create more flexible use of the accommodation to respond to changing family circumstances over time. Therefore, overall, a minor positive effect is expected against SA Objective 4 (Housing).

5.155 A minor positive effect is also expected against SA Objective 1 (Health and Wellbeing) because residential annexes allow for the support and care of family members.

5.156 Negligible effects are expected against the remaining SA Objectives.

Policy LP03 – Residential Extensions and Conversions**A. Policy LP03 – Residential Extensions and Conversions.**

No alternative options have been put forwards, 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.	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.	+
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

5.157 Policy LP03 (Residential Extensions and Conversions) supports residential extensions or conversions of buildings to ancillary use within the curtilage of residential dwellings, 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 greatly adding to the diversity and flexibility of the housing stock. A minor positive effect is expected against SA Objective 1 (Health and Wellbeing) because the policy ensures that development will not result in adverse effects on

residential amenity. As noted in the supporting text to the policy, all development should create good levels of amenity for future and neighbouring occupiers.

5.158 Policy LP03 states that development will be supported where it incorporates a high standard of design which maintains or enhances the character and appearance of buildings, street scenes and surroundings. Therefore, a minor positive effect is expected against SA Objective 13 (Landscape/Townscape).

5.159 Negligible effects are expected against the remaining SA Objectives.

Policy LP04 – Replacement Dwellings and Conversions

A. Policy LP04 – Replacement Dwellings and Conversions.

No alternative options have been put forwards, 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.	+
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 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.	0

Option A: Policy LP04 – Replacement Dwellings and Conversions

5.160 Policy LP04 (Replacement Dwellings and Conversions) sets out criteria for replacement dwellings on existing residential plots and the conversion of a plot to a dwelling. The Policy sets out that proposals for replacement dwellings will be supported where the building to be replaced has a lawful use as a permanent residential dwelling. Proposals for the conversion of buildings to residential use will be supported where it is demonstrated that the structure is capable of accommodating the use, and the development would reuse redundant or disused buildings and enhance its immediate setting.

5.161 Policy LP04 is expected to have a minor positive effect against SA Objective 1 (Health and Wellbeing) because it ensures that development will consider the amenity for both existing and future occupiers as well as maintain good levels of amenity for neighbouring occupiers.

5.162 Policy LP04 is also likely to have minor positive effects against SA Objective 12 (Historic Environment) and SA Objective 13 (Landscape/Townscape) as proposals for replacement dwellings and/or conversions must be of an appropriate scale and setting for the area, and use materials

to achieve a high standard of design in response to the context, and the character and appearance of the surrounding, and not be more visually intrusive than the original dwelling, in sensitive areas.

5.163 A minor positive effect is expected against SA Objective 4 (Housing) because the policy supports the replacement of dwellings and the conversion of a plot to a dwelling. This will enable people to adapt their homes to meet their changing needs, whilst also providing a range and mix of housing.

5.164 A minor positive effect is expected in relation to SA Objective 9 (Climate Change Mitigation) as the Policy encourages the reuse of redundant or disused buildings where possible. This has the potential to make substantial energy savings as the CO₂ emissions already embodied within the existing buildings will not be lost through demolition.

5.165 A minor positive effect is also expected against SA Objective 7 (Soils and Minerals) as replacement dwellings and/or conversions on existing residential plots, thereby previously developed land, does, to an extent prevent development elsewhere on agricultural land and help to preserve soil resources.

5.166 Negligible effects are expected against the remaining SA Objectives.

Policy LP05 – Rural Worker Dwellings

A. Policy LP05 – Rural Worker Dwellings.

No alternative options have been put forwards, 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.	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.	+/-
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	0

SA Objective	A.
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.	-?
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 LP05 – Rural Worker Dwellings

5.167 Policy LP05 (Rural Worker Dwellings) sets out criteria for residential accommodation for a rural worker outside settlement boundaries. According to the supporting text to the policy, although planning policies should avoid the development of isolated homes in the countryside, in certain circumstances such development may be appropriate, such as when there is an essential need to provide accommodation for a rural worker.

5.168 A minor positive effect is expected against SA Objective 4 (Housing) because the policy supports the provision of housing for rural workers, thereby supporting the housing need of different groups.

5.169 A minor positive effect is also expected against SA Objective 14 (Economy) as dedicated housing for rural workers is important to support agriculture, and rural occupations such as forestry, all of which help to sustain the rural economy.

5.170 Although the location of rural worker dwellings outside of settlement boundaries will reduce the need for commuting by these workers, as they will be closer to their place of work, development outside settlement boundaries 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. As such, the policy is expected to have mixed minor positive and minor negative effects in relation to SA Objectives 3 (Accessibility) and 16 (Sustainable Travel).

5.171 Mixed minor positive and minor negative effects are expected against SA Objective 9 (Climate Change Mitigation) and SA Objective 6 (Air and Noise), as potential increased use of private car to reach services and facilities in larger settlements, will see an increase in CO₂ emissions which will impact air pollution. However, locating rural worker dwellings close to workers place of work will reduce the need for commuting, thereby potentially decreasing use of private car and limiting climate change effects.

5.172 Further to this, the development of residential accommodation outside of settlement boundaries has the potential for adverse effects on the landscape setting, although this is dependent on the final design, scale, and layout of the development, and therefore there is an anticipated minor negative uncertain effect in relation to SA Objective 13 (Landscape/Townscape).

5.173 Negligible effects are expected against the remaining SA Objectives.

Policy LP06 – Supported and Special Needs Housing

A. Policy LP06 – Supported and Special Needs Housing.

No alternative options have been put forwards, as 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.	++

SA Objective	A.
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 townscape.	+
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 LP06 – Supported and Special Needs Housing

5.174 Policy LP06 (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 to older, disabled or vulnerable people and care leavers, people with learning difficulties, mental illness and physical disabilities. 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 is located within a settlement boundary and where there is good access to services and facilities, especially health services and public transport.

5.175 As set out in Policy LP06, specialist accommodation will be permitted where it is within areas that have sufficient access to local services and facilities, 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 settlements 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 significant positive effect already recorded against SA Objective 1 (Health and Wellbeing).

5.176 A minor positive effect is expected against SA Objective 13 (Landscape/Townscape) as the policy requires that proposals have a high quality of design that meets the specific needs of the intended occupiers and is sympathetic to the surrounding townscape and/or landscape.

5.177 Negligible effects are expected against the remaining SA Objectives.

Policy LP07 – Community-Led and Rural Exception Housing

A. Policy LP07 – Community-Led and Rural Exception Housing.

B. No market housing on rural exception sites.

SA Objective	A.	B.
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	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	0
6. To maintain and where possible improve air quality and reduce noise pollution.	0	0
7. To conserve soil and mineral resources.	-	0
8. To promote the sustainable management of waste.	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
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 townscape.	+/-?	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

Option A: Policy LP07 – Community-Led and Rural Exception Housing

5.178 Policy LP07 (Community-Led and Rural Exception Housing) encourages new homes to be delivered through community-led housing vehicles such as Community Land Trusts, co-operatives or co-housing groups. The policy states that community-led housing proposals must demonstrate that they were initiated by, and are being led by, a legitimate local community group, and that the scheme has general community support. Therefore, a significant positive effect is expected against SA Objective 4 (Housing) as this policy will ensure the delivery of homes for local people that meet housing need and are developed in a way that benefits the local community. This is also anticipated to have a minor positive effect on SA Objective 1 (Health and Wellbeing) as

community-led housing schemes place a stronger emphasis on active participation of residents within the planning process, which enable the community to tailor housing to their needs, thereby improving the health and wellbeing of their local community. A minor positive impact is also anticipated for SA Objective 3 (Accessibility) and SA Objective 16 (Sustainable Transport) as community-led rural exception site schemes will only be granted permission if they are well-connected to an existing settlement. This ensures that development is located in close proximity to a settlement where there is good access to services and facilities, including health services and public transport.

However, a mixed minor positive and minor negative effects are anticipated against SA Objective 9 (Climate Change) as, despite locating community-led rural exception site schemes

where they will be well-connected to existing settlements, since they will be outside of settlement boundaries, this could also increase reliance on private cars which would contribute to climate change through CO₂ emissions.

5.179 A mixed minor positive and uncertain minor negative effect is expected against SA Objective 13 (Landscape/Townscape) as the policy states that rural exception site housing schemes will be located outside of settlement boundaries, although the rural exception schemes must be proportionate in size to an existing settlement which could reduce adverse effects on landscape setting.

5.180 A minor negative effect is anticipated against SA Objective 7 (Soil and Minerals) as rural exception sites outside of settlement boundaries may be developed on high-quality agricultural land, which could result in soil degradation.

5.181 Negligible effects are expected against the remaining SA Objectives.

Option B: No market housing on rural exception sites

5.182 Option B 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 viability challenges to delivering the site exception site in the first place. Therefore overall, a mixed minor positive and minor negative effect is likely against SA objective 4 (Housing).

5.183 Negligible effects are expected against the remaining SA Objectives.

Discounted alternative options

- **Option B: No market housing on rural exception sites:** This approach is considered more restrictive to rural housing delivery options.

Policy LP08 – Self-Build and Custom-Build

A. Policy LP08 – Self-Build and Custom-Build.

No alternative options have been put forwards, 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.	+
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

SA Objective	A.
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 LP08 – Self-Build and Custom-Build

5.184 Policy LP08 (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).

5.185 Minor positive effects are also expected against SA Objective 1 (Health and Wellbeing) and 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.

5.186 Negligible effects are expected against the remaining SA Objectives.

Local Policies - Economy

Policy LP09 – Supporting a Prosperous Economy

A. Policy LP09 – Supporting a Prosperous Economy.

No alternative options have been put forwards, 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.	+
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.	+

SA Objective	A.
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 LP09 – Supporting a Prosperous Economy

5.187 Policy LP09 (Supporting a Prosperous Economy) aims to maintain a suitable diversity of employment sites to meet current and future economic needs in a sustainable way. As the policy supports employment development, a minor positive effect is expected against SA Objective 3 (Accessibility). Further to this, 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).

5.188 Policy LP09 is expected to have minor positive effects against SA Objective 12 (Historic Environment) and SA Objective 13 (Landscape/Townscape) because it states that employment proposals must be sensitive to the surroundings, including any landscape and heritage assets, as well as demonstrating a high standard of design.

5.189 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.

5.190 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. A minor negative effect is expected against SA Objective 16 (Sustainable Travel) as it is noted that the supporting text refers to rurally located economic development. The policy makes provision for sufficient on-site parking which could encourage the use of cars instead of more sustainable transport methods.

5.191 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 reasons outlined above. 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.

5.192 Uncertain effects are also expected in relation to SA Objective 11 (Biodiversity and Geodiversity) and 15 (Town Centres) because it is unknown where employment development will be, and therefore the likely effects against these two objectives is unknown, and so could also have effects on these two objectives.

5.193 Negligible effects are expected against the remaining SA Objectives.

Policy LP10 – Change from Employment Uses

A. Policy LP10 – Change from Employment Uses.

No alternative options have been put forwards, as the policy is a reasonable and proportionate approach to meeting economic needs.

SA Objective	A.
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	+

SA Objective	A.
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 LP10 – Change from Employment Uses

5.194 Policy LP10 (Change from Employment Uses) seeks to sustain a suitable land supply to meet economic demands, and therefore proposals for development will only be approved where the proposal would not compromise ongoing employment use(s). As the policy seeks to retain viable employment sites and premises, therefore maintaining economic activities, a significant positive is expected in relation to SA Objective 14 (Economic Growth). The retention of viable employment sites and premises will ensure that there is continued accessibility to employment opportunities.

Therefore, a significant positive effect is also expected against SA Objective 3 (Accessibility).

5.195 Policy LP10 states that proposals that would lead to the full or partial loss of employment sites or premises will be required to demonstrate that the proposal would not give rise to amenity conflicts with existing or proposed employment uses/activities in the vicinity of the site. A minor positive effect is therefore expected against SA Objective 1 (Health and Wellbeing).

5.196 Negligible effects are expected against the remaining SA Objectives.

Policy LP11 – Retail and Town Centres

A. Policy LP11 – Retail and Town Centres.

No alternative options have been put forwards, as the policy 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.	+

SA Objective	A.
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.	+
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 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 LP11 – Retail and Town Centres

5.197 Policy LP11 (Retail and Town Centres) 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 forwards that would otherwise take place.

5.198 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 town centres 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. Therefore, minor positive effects are expected against SA Objective 3 (Accessibility), SA

Objective 4 (Housing) and SA Objective 1 (Health and Wellbeing). A minor positive effect is also expected in relation to SA Objective 7 (Soils and Minerals) as supporting development residential uses on upper floors, prevents development from taking place elsewhere and potentially on agricultural land.

5.199 The promotion of development within town centres is likely to encourage more walking and cycling, as people are within easy walking and cycling distance of services and facilities. This could reduce reliance on the private car and also have beneficial effects on air quality and reduce the contribution to climate change e.g. through use of private cars and their associated emissions, and therefore minor positive effects are anticipated against SA Objective 6 (Air and Noise), SA Objective 9 (Climate Change Mitigation) and SA Objective 16 (Sustainable Travel).

5.200 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) and also SA Objective 11 (Biodiversity and Geodiversity)

5.201 Negligible effects are expected against the remaining SA Objectives.

Policy LP12 – Tourism and Leisure

A. Policy LP12 – Tourism and Leisure.

No alternative options have been put forward 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.	+
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.	+/-
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 LP12 – Tourism and Leisure

5.202 Policy LP12 (Tourism and Leisure) supports proposals for new tourism and leisure facilities and accommodation, as well as improvements/extensions to existing facilities so as to increase the range, quality and accessibility of 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), SA Objective 3 (Accessibility),

5.203 A minor positive effect is anticipated against SA Objective 1 (Health and Wellbeing) as the policy specifically states that proposals outside settlement boundaries may be

supported where the proposal increases access, enjoyment and interpretation of the countryside, appropriately, sensitively and sustainable.

5.204 Mixed minor positive and minor negative effects are expected against and SA Objective 13 (Landscape/Townscape) because proposals will be supported where they respect the character of the landscape by having regard to landscape guidance that supports the development plan, as well as demonstrate consideration of the environmentally sensitive characteristics of the area. However, there could be adverse impacts locally and cumulatively from increased tourism development. A mixed minor positive and minor negative effect is also expected against SA Objective 11 (Biodiversity and Geodiversity) because the policy seeks to

provide for environmental improvements. It specifically follows a hierarchy of avoiding impacts, mitigating impacts so as to make them insignificant on local ecology, biodiversity, trees and hedgerows, or as a last resort compensate for losses that cannot be avoided or mitigated. However, such activity does have the potential to disturb biodiversity, habitats, and ecological networks. Compensation may be difficult to achieve in practice.

5.205 The policy states that proposals for new tourism facilities, or improvements/extensions to existing facilities, will 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 CO₂ emissions which can have adverse effects on air quality whilst also contributing towards climate change. Therefore, a mixed minor 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).

5.206 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. The policy specifically requires that proposals enhance the vitality of places.

5.207 Negligible effects are expected against the remaining SA Objectives.

Policy LP13 – Countryside Tourist Accommodation

A. Policy LP13 – Countryside Tourist Accommodation.

No alternative options have been put forward 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.	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 townscape.	+
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	+/-
15. To revitalise the Districts' town centres.	0

SA Objective	A.
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

Option A – Policy LP13 – Countryside Tourist Accommodation

5.208 Policy LP13 (Countryside Tourist Accommodation) supports tourist accommodation outside settlement boundaries 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.

5.209 A minor positive effect is expected in relation to SA Objective 4 (Housing) because this policy supports the development of tourist accommodation.

5.210 In addition, the policy requires that new tourist accommodation be sympathetic to the character of the area.

Therefore, a minor positive effect is expected in relation to SA Objective 13 (Landscape/Townscape).

5.211 Minor negative effects are anticipated against SA Objective 12 (Historic Environment) and SA Objective 11 (Biodiversity and Geodiversity), as the development of tourist accommodation outside of settlement boundaries has the potential to cause habitat disturbance, and disturbance towards ecological networks and biodiversity, in addition to heritage assets. Further to this, there is no mention of heritage assets within the policy. The minor negative effect against SA Objective 11 is coupled with a minor positive effect, as new tourist accommodation will be controlled by planning conditions which take account of locational ecological impacts. The policy also seeks to deliver tourist accommodation that provides environmental benefits.

5.212 Negligible effects are expected against the remaining SA Objectives.

Policy LP14 – Intensive Livestock and Poultry Farming

A. Policy LP14 – Intensive Livestock and Poultry Farming.

No alternative options have been put forwards, 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.	+
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.	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.	0
11. To conserve and enhance biodiversity and geodiversity.	+/-

SA Objective	A.
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.	++
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 LP14 – Intensive Livestock and Poultry Farming

5.213 Policy LP14 (Intensive Livestock and Poultry Farming) sets out a framework for the consideration of proposals for intensive livestock and poultry, and associated structures and facilities for the storage and disposal of waste. This policy seeks to support this specific agricultural sector, which comprises a large component of the agricultural industry in Babergh and Mid Suffolk. A significant positive effect is therefore expected against SA Objective 14 (Economy).

5.214 Policy LP14 seeks to prevent adverse impacts on residential amenity, stating that siting, design, materials used (including lighting) and methods of operation must serve to protect the amenity of residential properties, avoiding or effectively mitigating odour, light and other forms of pollution and disturbance. Further to this, the policy does not support sensitive land uses such as residential within 400m of established intensive livestock and/or poultry units. This is anticipated to have a minor positive effect against SA Objective 1 (Health and Wellbeing).

5.215 Mixed minor positive and minor negative effects are expected against SA Objective 6 (Noise and Air) because although the policy states that proposals must demonstrate that there will be no significant effects upon sensitive receptors from air pollutants, through submission of approved emission modelling, an increase of intensive agricultural units, particularly pig and poultry farms will inevitably result in an increase in pollutants and traffic volume – particularly over the period of a production cycle.

5.216 Mixed minor positive and minor negative effects are also expected in relation to SA Objective 11 (Biodiversity and Geodiversity). Although the policy sets out that proposals will protect sensitive environmental receptors through appropriate pollution prevention measures and supported by demonstrable on-site contingency measures, intensive livestock and poultry farming is linked to local biodiversity damage from ammonia emissions, and nutrients from manure, and therefore there will inevitably be an adverse effect towards biodiversity and geodiversity.

5.217 The policy states that agricultural buildings or new proposals in isolated locations outside settlement boundaries will be accepted provided they give appropriate justification and demonstrable evidence for the location. However, development in remote locations outside of settlement boundaries will promote an increase of traffic volumes and HGV movements. The Policy does however also mention that proposals must not generate an unacceptable increase in traffic volumes and HGV movements over the period of a production cycle. Therefore, a mixed minor positive and minor negative effect is expected in relation to SA Objective 16 (Sustainable Travel). A mixed minor positive and minor negative effect is also expected in relation to SA Objective 9 (Climate Change), as development outside of settlement boundaries may increase use of the private car and associated emissions, which can contribute to climate change whilst also causing air pollution. However, this is partly mitigated through the requirement for no unacceptable increase in traffic volumes and HGV movements. This is also the case with regards to SA objective 6 (Noise and Air) but which is already recorded as having a mixed minor positive and minor negative effect.

5.218 Policy LP14 is likely to have a mixed minor positive and minor negative effect on SA Objective 13 (Landscape/Townscape) as the situation of agricultural buildings outside settlement boundaries has the potential for adverse effects on the landscape, although the policy states that proposals must minimise visual and landscape impact and incorporate suitable landscaping proposals. A mixed minor positive and minor negative effect is also anticipated against SA Objective 5 (Water). Intensive farming will impact water quality as both surface and ground water sources will be subjected to various pollutants. However, the policy stipulates that proposals will consider and address the impact on water resources and the capacity of the water supply infrastructure network, taking account of the limitation on the Hartismere supply network, which will limit adverse effects on water quality.

5.219 A minor positive effect is expected against SA Objective 8 (Waste), as the policy requires proposals to demonstrate that adequate provision has been made for the management

and disposal of waste materials for each production cycle, reinforced by the submission of an approved waste management plan.

5.220 Negligible effects are expected against the remaining SA Objectives.

Local Policies – Environment

Policy LP15 – Environmental Protection and Conservation

A. Policy LP15 – Environmental Protection and Conservation.

No alternative options have been put forwards, as the policy approach is appropriate to securing environmental protection and conservation.

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 LP15 – Environmental Protection and Conservation.

5.221 Policy LP15 (Environmental Protection and Conservation) seeks to ensure that all developments are sustainable by giving consideration to the efficient and effective use of land, land contamination and instability, pollution and environmental amenity, and water.

5.222 The policy prioritises development on previously developed 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 building materials used in construction. This will reduce the amount of waste generated by development overall. Therefore, significant

positive effects Are expected in relation to SA Objective 7 (Soils and Minerals) and SA Objective 8 (Waste).

5.223 The policy seeks to prevent, or where this is not possible, mitigate and reduce to a minimum 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).

5.224 The policy requires compliancy with the SCC Construction Surface Water Management Plan. Further to this, development proposals must demonstrate the protection and practicable enhancement of 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).

5.225 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. Therefore, development could have an adverse effect on biodiversity.

5.226 Mixed minor positive and minor negative effects are 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.

5.227 Negligible effects are expected against the remaining SA Objectives.

Policy LP16 – Biodiversity and Geodiversity

A. Policy LP16 – Biodiversity and Geodiversity

No alternative options have been put forwards, as the policy approach is appropriate to securing biodiversity and geodiversity 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.	+
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.	++

SA Objective	A.
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 LP16 – Biodiversity and Geodiversity

5.228 Policy LP16 (Biodiversity and Geodiversity) seeks to protect biodiversity and geodiversity assets within both Districts. The policy states that development should protect designated sites and potentially 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. The Councils will seek appropriate resources from developers for monitoring of biodiversity net gain from developments. Where biodiversity assets cannot be retained or enhanced on site, the Councils will support the delivery of net gain in biodiversity off-site. Therefore, a significant positive effect is expected against SA Objective 11 (Biodiversity and Geodiversity).

5.229 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, minor positive effects are expected against SA Objective 1 (Health and Wellbeing) and SA Objective 16 (Sustainable Travel). Minor positive effects are also expected in relation to SA Objectives 6 (Air and Noise) and 9 (Climate Change Mitigation), as encouraging walking will reduce reliance on the private car and associated emissions, whilst also minimising air pollution.

5.230 The conservation, restoration and contribution to the enhancement of biodiversity and geological conservation, which could include wildlife corridors which link to existing green infrastructure networks, will also help to mitigate and adapt to climate change, particularly as conserved or restored habitats can remove carbon dioxide from the atmosphere, thus helping to address climate change by storing carbon. This contributes towards the minor positive effects already expected in relation to SA Objective 6 and SA Objective 9 (Climate Change Mitigation).

5.231 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.

5.232 Negligible effects are expected against the remaining SA Objectives.

Policy LP17 – Landscape

A. Policy LP17 – Landscape.

No alternative options have been put forwards, as the policy approach is in conformity with the NPPF and is relevant to local circumstances.

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. SA Objective	A.
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 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.	0

Option A: Policy LP19 – Landscape

5.233 Policy LP19 (Landscape) seeks to conserve and enhance landscape character. The policy supports proposals that integrate 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 the natural and built landscape and visual amenity impacts (such as dark skies and tranquil areas). 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).

According to the supporting text to Policy LP17, all new development proposals need to ensure that they respond to and reinforce the local distinctiveness of the area in scale, form, design, materials and location. For example, by use of materials which complement the local individual landscape character, archaeological and historic patterns of settlement

and land use and designations. Therefore, a minor positive effect is expected against SA Objective 12 (Historic Environment).

5.234 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.

5.235 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.

5.236 Negligible effects are expected against the remaining SA Objectives.

Policy LP18 – Area of Outstanding Natural Beauty

A. Policy LP18 – Area of Outstanding Natural Beauty.

No alternative options have been put forwards, 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.	+
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 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.	0

Option A: Policy LP18 – Area of Outstanding Natural Beauty

5.237 Policy LP18 (Area of Outstanding Natural Beauty) supports non-major development within the AONBs and their settings, provided they give great weight to the conservation and enhancement of 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 of the AONBs. Development must be sensitive to the natural and built landscape and visual impacts (including on dark skies and tranquil areas). Additionally, development within the AONB project areas should have regard to the relevant Valued Landscape Assessment. Therefore, overall, Policy LP18 is expected to have a

significant positive effect against SA Objective 13 (Landscape/Townscape).

5.238 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 by restricting development 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. 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 AONBs. The policy also supports proposals which will

conserve the distinctiveness of the AONBs (including quality views), support the public enjoyment of these areas and the wider social and economic objectives set out in the AONB Management Plans. This is expected to have a minor positive effect against SA Objective 1 (Health and Wellbeing) as this policy encourages public enjoyment of AONBs thereby supporting access to open public space.

5.239 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.

5.240 Negligible effects are expected against the remaining SA Objectives.

Policy LP19 – The Historic Environment

A. Policy LP19 – The Historic Environment.

No alternative options have been put forwards, 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.	+
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 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.	0

Option A: Policy LP19 – The Historic Environment

5.241 Policy LP19 (The Historic Environment) seeks to protect and enhance the historic environment. The policy states 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 which describes the significance of any heritage asset that is affected including any contribution made by their setting. Likewise, where development has the potential to affect heritage assets of archaeological interest, the heritage statement must include a desk-based assessment, and where necessary, a field evaluation by a suitably qualified person. Further to this, if relevant the heritage statement must also demonstrate how preservation in situ of those archaeological assets can be achieved through the design of the development and safeguarding during construction. 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).

5.242 Policy LP19 also states that development 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). Further to this, as the policy supports the re-use/ re-development of a heritage asset, a minor positive effect is expected against SA Objective 7 (Soils and Minerals), as this will reduce the adverse direct impacts of construction activity, such as increased erosion from soil exposure during construction, and contamination of soil from fuel leaks during construction and maintenance. 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. The maintenance of heritage assets ensures that the economic sustainability of heritage is greater which attracts economic investment (e.g. tourism) and the delivery of high quality housing.

5.243 Negligible effects are expected against the remaining SA Objectives.

Policy LP20 – Equestrian or Similar Other Animal Land-Based Uses

A. Policy LP20 – Equestrian or Similar Other Animal Land-Based Uses.

No alternative options have been put forwards, 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.	+
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.	0

SA Objective	A.
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.	+
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 – Equestrian or Similar Other Animal Land-Based Uses

5.244 Policy LP20 (Equestrian or Similar Other Animal Land-Based Uses) supports the use of land for equestrian purposes or other similar animal land-based uses, including the erection of buildings and equipment 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). This policy helps to support the rural economy, as well as ensuring that an attractive environment is maintained, which would attract economic investment such as tourism. However, the policy could also prevent economic development happening that would otherwise take place, and therefore a mixed minor positive and minor negative effect is expected in relation to SA Objective 14 (Economic Growth).

5.245 Reference is made to residential accommodation in the policy, which will be supported provided applicants demonstrate that they have prioritised the re-use of existing buildings. Therefore, minor positive effects are expected in relation to SA Objective 4 (Housing), and SA Objective 9 (Climate Change Mitigation), as the re-use of existing buildings has the potential to make substantial energy savings by reducing the use of new materials. A minor positive effect is expected against SA Objectives 7 (Soils and Minerals) and 8

(Waste) because development would be unlikely to result in the loss of best and most versatile agricultural land, whilst also reducing construction waste. Applicants must convincingly demonstrate that there are no suitable alternative sites on lower grade land if the proposal is located on the best and more versatile agricultural land. The re-use of existing buildings also limits the adverse direct impacts of construction activity on agricultural land, particularly habitat loss, degradation, fragmentation, and soil contamination. According to the policy, the siting, size, scale, design and materials must not create a significant adverse impact on the natural and local environment or the appearance of the locality. Further to this, where there are already buildings and structures on site, new buildings should be close to and/or integrated with structures to minimise impact on the landscape. Therefore, a minor positive effect is expected in relation to SA Objective 13 (Landscape/Townscape). A minor positive effect is also expected in relation to SA Objective 1 (Health and Wellbeing) as good design, layout, and siting should minimise any impact on residential amenity. The policy stipulates that proposals must demonstrate that noise, odour or other emissions that are likely to give rise to significant adverse impact on amenity, can be effectively mitigated. As such, a minor positive effect is also likely in relation to SA Objective 6 (Noise and Air).

5.246 Negligible effects are expected against the remaining SA Objectives.

Policy LP21 – Agricultural Land to Residential Garden Land

A. Policy LP21 – Agricultural Land to Residential Garden Land.

No alternative options have been put forwards, 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.	+

SA Objective	A.
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.	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.	0

Option A: Policy LP21 – Agricultural Land to Residential Garden Land

5.247 Policy LP21 (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.

5.248 Change in use of agricultural land to residential garden land or land ancillary to a residential dwelling is supported provided that a proposal has no adverse impact on biodiversity. Proposals must not result in the loss of trees of hedgerows which contribute to the character of the area. Therefore, a minor positive effect is expected in relation to SA Objective 11 (Biodiversity and Geodiversity).

5.249 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, a minor positive effect is expected in relation to SA Objective 13 (Landscape/Townscape).

5.250 The policy is considered to have a minor positive effect on SA Objective 1 (Health and Wellbeing) as proposals must not have an unacceptable amenity effect on nearby residential occupiers.

5.251 Negligible effects are expected against the remaining SA Objectives.

Policy LP22 – New Agricultural Buildings

A. Policy LP22 – New Agricultural Buildings.

No alternative options have been put forwards, 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.	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.	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 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 LP22 – New Agricultural Buildings

5.252 Policy LP22 (New Agricultural Buildings) resists development of new agricultural buildings outside settlement boundaries unless there is demonstrable evidence to justify the need for such development. The policy therefore supports the rural economy, with a minor positive effect expected in relation to SA Objective 14 (Economic Growth).

5.253 Mixed minor positive and minor negative effects are expected against SA Objective 6 (Air and Noise), and SA Objective 16 (Sustainable Travel), as the policy resists agricultural development outside of settlement boundaries which makes it more likely for people to be based in central urban areas where services are located, limiting long distance travel via private cars. However, the policy also supports agricultural development outside settlement boundaries, provided it can be justified through demonstrable evidence. This could increase use of the private car, as well as promote

an increase in lorries/HGV's on rural roads and highways, although the policy does state that significant impacts on the transport network must be mitigated. This is also likely to have a minor negative effect on SA Objective 9 (Climate Change Mitigation), as the increased use of the private car, lorries, and HGV's on rural roads and highways will see an increase in CO₂ emissions. 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, 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 impact the amenity of nearby residential occupiers.

5.254 Negligible effects are expected against the remaining SA Objectives.

Policy LP23 – Sustainable Construction and Design

A. Policy LP23 – Sustainable Construction and Design.

No alternative options have been put forwards, 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 LP23 – Sustainable Construction and Design

5.255 Policy LP23 (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 CO₂ 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 (e.g. SuDS). Therefore, a significant positive effect is expected against SA Objectives 9 (Climate Change Mitigation) and 10 (Climate Change Adaptation).

5.256 The policy 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).

5.257 The policy also seeks to achieve considerable reductions in CO₂ emissions, whilst also encouraging on-site renewable and other low carbon energy generation. There is a requirement to submit a Sustainability Design and Construction Statement as part of an application, to explore the CO₂ savings that can be achieved with each source of energy, to allow the greatest reduction in CO₂ which otherwise

can have adverse effects on pollution. Therefore, a minor positive effect is expected in relation to SA Objective 6 (Air and Noise).

5.258 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. The current energy crisis is driving the cost of living crisis. It is therefore more important than ever for the UK to boost long-term energy independence, and reduce reliance on foreign imports and associated costs.

5.259 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.

5.260 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) 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.

5.261 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.

5.262 Negligible effects are expected against the remaining SA Objectives.

Policy LP24 – Design and Residential Amenity

A. Policy LP4 – Design and Residential Amenity.

No alternative options have been put forwards, 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.	+
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.	++

SA Objective	A.
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 LP24 – Design and Residential Amenity

5.263 Policy LP24 (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, amenity 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. The policy stipulates that all new development proposals provide at least 50% of dwellings which meet the requirements for accessible and adaptable dwellings under Part M4(2) of Building Regulations, and where site viability issues exist, proposals must be supported by a viability assessment which convincingly demonstrates what the maximum viable contribution for accessible and adaptable dwellings is. This is likely to have a significant positive effect on SA Objective 1 (Health and Wellbeing) and a minor positive effect on SA Objective 4 (Housing). With regard to safety, development must design out crime and also create an environment for people to feel safe with a strong community focus, contributing towards the significant positive effect already recorded in relation to SA Objective 1.

5.264 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. The policy also references green infrastructure, which may also encourage walking as tends to comprise green corridors. Encouraging walking will reduce reliance on the private car and associated emissions. Therefore, a minor positive effect on SA Objective 9 (Climate Change Mitigation). A minor positive effect is also expected in relation to SA Objective 6 (Air and Noise) as increased active travel will reduce both air and noise pollution. The policy also makes reference to noise pollution and the need to protect the residential amenity of occupiers.

5.265 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).

5.266 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. All developments must demonstrate that they have regard to the design principles set out through Suffolk Design, the Councils' Design Supplementary Planning Documents. Development which fails to maintain and improve the quality and character of the area will not be supported. 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 a minor positive effect also expected against SA Objective 12 (Historic Environment).

5.267 Policy LP24 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).

5.268 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. The supporting text to Policy LP24 states that new development must follow long-term design principles and measures 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 and contributing towards the minor positive effect already recorded against SA Objective 4 (Housing). The production of a high-quality environment may also encourage more people, and therefore investment to the area. A minor positive effect is therefore anticipated against SA Objective 14 (Economy).

5.269 A minor positive effect is also expected against SA Objective 8 (Waste) because the policy requires the provision of appropriate long-term design principles and measures in terms of privacy and adequate facilities such as bin storage,

including recycling and re-use bins, to be included as part of development.

5.270 Negligible effects are expected against the remaining SA Objectives.

Policy LP25 – Energy Sources, Storage and Distribution

A. Policy LP25 – Energy Sources, Storage and Distribution.

No alternative options have been put forwards, 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.	+
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 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.	0

Option A: Policy LP25 – Energy Sources, Storage and Distribution

5.271 Policy LP25 (Energy Sources, Storage and Distribution) promotes the use of renewable and low carbon, decentralised and community energy generating 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.

5.272 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).

5.273 Proposals for renewable and low carbon energy will be supported provided they have no adverse impact on 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 convincingly demonstrate that any harm will be

effectively mitigated. They must also demonstrate that there are no alternative sites within the District that can be used, or for community initiatives within the area which it is intended to serve. Therefore, minor positive effects are 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.

5.274 A minor positive effect is expected against SA Objective 3 (Accessibility) as the policy states that development incorporating renewables or low carbon energy design, must

take an integrated approach that both maximises operational efficiency and limits impact on amenity.

5.275 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.

5.276 Negligible effects are expected against the remaining SA Objectives.

Policy LP26 – Water Resources and Infrastructure

A. Policy LP26 – Water Resources and Infrastructure.

No alternative options have been put forwards, 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 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 LP26 – Water Resources and Infrastructure

5.277 Policy LP26 (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.

5.278 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.

5.279 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 Protected Habitat Sites and AONBs.

5.280 Negligible effects are expected against the remaining SA Objectives.

Policy LP27 – Flood Risk and Vulnerability**A. Policy LP27 – Flood Risk and Vulnerability.**

No alternative options have been put forwards, 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

SA Objective	A.
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	0

Option A: Policy LP27 – Flood Risk and Vulnerability

5.281 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, through the application of a sequential approach within the design and layout of the site, including the incorporation of measures such as SuDS, rainwater harvesting and greywater recycling into new developments, and avoiding or mitigating risks to ground or surface water quality. 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.

5.282 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).

5.283 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. However, this excludes public open space. 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).

5.284 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.

5.285 Negligible effects are expected against the remaining SA Objectives.

Policy LP28 – Services and Facilities Within the Community

A. Policy LP28 – 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	0	0

SA Objective	A.	B.	C.
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 LP28 – Services and Facilities Within the Community

5.286 Policy LP28 (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 it supports the protection, improvement, and provision of new accessible local services and community facilities, including open spaces, community centres, educational, and healthcare facilities. The policy states that where such facilities will be lost, compensatory alternative facilities will be provided. With specific regard to open space, the policy requires all developments in excess of one hectare to provide on-site open space provision to meet the needs it creates having regard to what is already in the area and the most recent Open Space Assessment. This is unless the LPA considers it more appropriate to make improvements to existing open space within the locality in an equally or more accessible location than the proposed development.

5.287 Minor positive effects are 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. The policy goes on to mention that proposals located outside settlement boundaries will be supported, provided they demonstrate evidence of the community need for and/or the benefits of the new facilities and good accessibility to the community to be served.

5.288 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).

5.289 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 subject to Plan policy compliance.

5.290 In addition, the policy requires that proposals should have a high standard of design and 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).

5.291 Negligible effects are expected against the remaining SA Objectives.

Option B: Leave the protection of community services and facilities to the NPPF

5.292 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.

5.293 Negligible effects are expected against the remaining SA Objectives.

Option C: Restrict the loss of all community facilities

5.294 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.

5.295 As was the case with Option A, minor positive effects are expected against SA Objective 6 (Air and Noise), SA Objective 12 (Historic Environment), SA Objective 13 (Landscape/Townscape), SA Objective 14 (Economic Growth), SA Objective 15 (Town Centres) and SA Objective 16 (Sustainable Travel) for the reasons set out above.

5.296 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.

5.297 Negligible effects are expected against the remaining SA Objectives.

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 LP29 – Safe, Sustainable and Active Transport

A. Policy LP29 – Safe, Sustainable and Active Transport.

No alternative options have been put forwards, 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 townscapes.	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 LP29 – Safe, Sustainable and Active Transport

5.298 Policy LP29 (Safe, Sustainable and Active Transport) is expected to have a significant positive effect in relation to SA Objective 16 (Sustainable Travel) as it aims to increase the use of, enhance and improve accessibility to sustainable and active modes of transport, and maximise opportunities to utilise these models in accordance with the transport hierarchy. 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.

5.299 The policy supports sustainable and active modes of transport, which would reduce journeys made by private vehicles. This is likely to reduce air and noise pollution, and the release of greenhouse gas emissions, and therefore minor positive effects are expected in relation to SA Objective 6 (Air and Noise) and SA Objective 9 (Climate Change Mitigation).

5.300 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 protect and enhance the existing PRow network, which may improve accessibility to areas of open spaces and services and facilities.

5.301 In addition, minor positive effects are expected in relation to SA Objective 11 (Biodiversity and Geodiversity) as the policy states that where possible, active travel is to be tied in with the green infrastructure network to support net environmental gains.

5.302 Negligible effects are expected against the remaining SA Objectives.

Policy LP30 – Managing Infrastructure Provision**A. Policy LP30 – Managing Infrastructure Provision.**

No alternative options have been put forwards, 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

SA Objective	A.
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 LP30 – Managing Infrastructure Provision

5.303 Policy LP30 (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 all necessary infrastructure, as identified in the Councils' Infrastructure Delivery Plan, 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),

5.304 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).

5.305 Negligible effects are expected against the remaining SA Objectives.

Policy LP31 – Health and Education Provision

A. Policy LP31 – Health and Education Provision.

No alternative options have been put forwards, 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.	+
7. To conserve soil and mineral resources.	0
8. To promote the sustainable management of waste.	0

SA Objective	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.	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 LP31 – Health and Education Provision

5.306 Policy LP31 (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 it seeks to protect sites with a health and educational use from development of other 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.

5.307 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.

5.308 In addition, minor positive effects are expected in relation to SA Objective 16 (Sustainable Travel), SA Objective 6 (Air and Noise) and SA Objective 9 (Climate Change Mitigation) as it ensures that new facilities are placed in the best possible location to promote sustainable transport modes. This may reduce dependence on car use, thus reducing the release of greenhouse gas emissions. Minor negative effects are identified in relation to SA Objective 4 (Housing), as the policy seeks to futureproof provision of healthcare and educational facilities by ensuring that speculative windfall development proposals do not undermine the ability of existing facilities to expand in the future if required. 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.

5.309 Negligible effects are expected against the remaining SA Objectives.

Policy LP32 – Developer Contributions and Planning Obligations

A. LP32 – Developer Contributions and Planning Obligations.

No alternative options have been put forwards, 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.	+?

SA Objective	A.
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 LP32 – Developer Contributions and Planning Obligations

5.310 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.

5.311 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), Joint Local Plan as proposed to be modified, and Infrastructure Funding Statements. 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).

5.312 Negligible effects are expected against the remaining SA Objectives.

Summary of SA findings for the non-strategic local policies

5.313 Table 5.3 below summarises the SA findings for Section B of the JLP as proposed to be modified (the Part 1 Plan).

Table 5.3: Summary of SA findings for Section B of the JLP as proposed to be modified

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 Infill Development Outside Settlement Boundaries	+	0	-	+/-	0	-	+	0	-	0	0	+	+	0	0	-
Policy LP02 – Residential Annexes	+	0	0	+	0	0	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	0	0
Policy LP04 – Replacement Dwellings and Conversions	+	0	0	+	0	0	+	0	+	0	0	+	+	0	0	0
Policy LP05 – Rural Worker Dwellings	0	0	+/-	+	0	+/-	0	0	+/-	0	0	0	-?	+	0	+/-
Policy LP06 – Supported and Special Needs Housing	++	0	+	++	0	0	0	0	0	0	0	0	+	0	+	+
Policy LP07 – Community-Led and Rural Exception Housing	+	0	+	++	0	0	-	0	+/-	0	0	0	+/-?	0	0	+
Policy LP08 – Self-Build and Custom-Build	+	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0
Policy LP09 – Supporting a Prosperous Economy	+	+	+	0	0	+/-	?	0	+/-	0	?	+	+	++	?	-
Policy LP10 – Change from Employment Uses	+	0	++	0	0	0	0	0	0	0	0	0	0	++	0	0
Policy LP11 – Retail and Town Centres	+	0	+	+	0	+	+	0	+	0	+	0	+	++/-	++	+
Policy LP12 – Tourism and Leisure	+	0	++	0	0	+/-	0	0	+/-	0	+/-	0	+/-	++	+	+/-
Policy LP13 – Countryside Tourist Accommodation	0	0	0	+	0	0	0	0	0	0	+/-	-	+	+/-	0	0
Policy LP14 – Intensive Livestock and Poultry Farming	+	0	0	0	+/-	+/-	0	+	+/-	0	+/-	0	+/-	++	0	+/-
Policy LP15 – Environmental Protection and Conservation	++	0	0	+/-	++	++	++	++	0	0	+/-	0	0	+/-	0	0

Chapter 5

Sustainability Appraisal findings for the Joint Local Plan as proposed to be modified

Babergh Mid Suffolk Joint Local Plan: Main Modifications

February 2023

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 LP16 – Biodiversity and Geodiversity	+	0	0	+/-	0	+	0	0	+	0	++	0	++	+/-	0	+
Policy LP17 – Landscape	0	0	0	+/-	0	0	0	0	0	0	+	+	++	+/-	0	0
Policy LP18 – Area of Outstanding Natural Beauty	+	0	+	+/-	0	+	0	0	0	0	+	+	++	+/-	0	0
Policy LP19 – The Historic Environment	0	0	0	+/-	0	0	+	0	0	0	0	++	+	+/-	0	0
Policy LP20 – Equestrian or Similar Other Animal Land-Based Uses	+	0	+	+	0	+	+	+	+	0	0	0	+	+/-	0	0
Policy LP21 – Agricultural Land to Residential Garden Land	+	0	0	0	0	0	0	0	0	0	+	0	+	0	0	0
Policy LP22 – New Agricultural Buildings	+	0	0	0	0	+/-	0	0	-	0	+	+	+	+	0	+/-
Policy LP23 – Sustainable Construction and Design	+	+	+	+/-	++	++	+	+	++	++	+	0	+	0	0	+
Policy LP24 – Design and Residential Amenity	++	0	+	+	0	+	0	+	+	0	++	+	+	+	0	++
Policy LP25 – Energy Sources, Storage and Distribution	+	+	+	0	+	+	0	0	++	0	+	+	+	++	0	0
Policy LP26 – Water Resources and Infrastructure	0	0	0	0	++	0	0	0	0	++	+	0	0	0	0	0
Policy LP27 – Flood Risk and Vulnerability	+	0	0	+	++	0	+	0	0	++	+	+	+	+	0	0
Policy LP28 – Services and Facilities Within the Community	++	++	++	+	0	+	0	0	0	0	0	+	+	+	+	+
Policy LP29 – Safe, Sustainable and Active Transport	++	0	+	0	0	++	0	0	++	0	+	0	0	0	+	++
Policy LP30 – Managing Infrastructure Provision	++	++	++	+	++	0	0	++	+	++	0	0	0	+	+	+/-
Policy LP31 – Health and Education Provision	++	++	++	-	0	+	0	0	+	0	0	0	+	0	0	+

Chapter 5

Sustainability Appraisal findings for the Joint Local Plan as proposed to be modified

Babergh Mid Suffolk Joint Local Plan: Main Modifications

February 2023

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 LP32 – Developer Contributions and Planning Obligations	+	+	+	++	+	+	0	+	+	+	+	0	0	+	0	+

Cumulative effects

Introduction

5.314 It is a requirement of the SEA Regulations to identify cumulative effects. With respect to the JLP as proposed to be modified (the Part 1 Plan), these can be divided into two categories:

- The cumulative effects of the policies in the JLP as proposed to be modified as a whole.
- The cumulative effects of the JLP as proposed to be modified with development proposed in other plans or projects in Suffolk neighbouring authorities.

5.315 Although the previous iteration of the SA (October 2020) considered the cumulative effects of site allocations on individual settlements, this no longer needs to be considered as all non-strategic place and site allocation policies are proposed to be removed from the Part 1 Plan. Cumulative effects on settlements should be considered as part of the SA of the forthcoming Part 2 JLP, which will include site allocations.

Cumulative effects assessment of the policies in the JLP

5.316 Summaries of the SA findings for each of the JLP policies as proposed to be modified can be found in the following summary tables:

- For Section A (vision, objectives and strategic policies), the SA summary effects can be found in **Table 5.2**.
- For Section B (non-strategic policies), the SA summary effects can be found in **Table 5.3**.

5.317 The SA of the policies has considered each policy on the basis of the wording of that policy only. 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).

5.318 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

5.319 The majority of policies in Section A and Section B of the JLP as proposed to be modified 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 the communities within both Babergh and Mid Suffolk. The housing policies seek to supply the numbers and types of housing required in the area,

although it is acknowledged that extant planning permissions provide for the vast majority of each District's housing requirements across the Plan period. The policies place 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.

5.320 Policies that address environmental protection 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.

5.321 Overall, it is considered that the JLP as proposed to be modified (the Part 1 Plan) 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

5.322 Only a small number of the JLP Section A and Section B policies are considered likely to have an effect on SA Objective 2. However, where such effects are identified, they are likely to be positive. The most significant effects are associated with policies that seek to provide the community infrastructure and education facilities required to support new development.

5.323 Overall, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have 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

5.324 Over half of the policies in Section A and Section B of the JLP as proposed to be modified are likely to have a positive effect on SA Objective 3. This is because the policies 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. Only four policies are considered likely to have minor negative effects, three of which are mixed with minor positive effects. The negative effects are due to different reasons. Development is supported within existing settlement boundaries where numerous services and facilities are located. However, this may increase pressure on existing services and facilities, particularly in the smaller settlements. Furthermore, some development (e.g. strategic employment sites) is supported outside of the main centres of population, with poor access to services and facilities.

5.325 Overall, it is considered that the JLP as proposed to be modified (the Part 1 Plan) 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

5.326 One of the key focal points of the JLP as proposed to be modified 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 the type of home, including affordable homes, and homes for particular needs, such as the elderly. Considerable attention is also placed on the quality of housing provision in terms of design and specifications.

5.327 As a result, a number of policies in Sections A and B of the JLP as proposed to be modified are likely to have positive effects, and in many instances these effects are considered to be significant. The JLP as proposed to be modified (the Part 1 Plan) does not, however, allocate any new residential sites. As stated at the beginning of this report, the forthcoming Part 2 Plan will instead allocate new residential sites, in addition to establishing the spatial strategy and settlement hierarchy, whilst also addressing the housing needs of Gypsies, Travellers and Travelling Showpeople, and Houseboat Dwellers. The Part 1 Plan is therefore limited in what it can achieve in terms of housing provision to meet local needs. This is despite the identification of a shortfall of 1,191 homes within Babergh District. It is also noted that on some occasions, policies that seek to protect the environment, and similar policies within the JLP as proposed to be modified, could restrict opportunities to develop housing.

5.328 Therefore, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have a **cumulative significant positive (++/-) effect** on SA Objective 4 (Housing), albeit with uncertainty.

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

5.329 Water resources and water quality are important issues 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, particularly in the Hartismere Water Resource Zone. In addition, Source Protection Zones have been identified where there is a risk of pollution to drinking water supplies from inappropriate development.

5.330 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. Only one policy, LP14 (Intensive Livestock and Poultry Farming), could result in a negative effect against this objective, although this is coupled with a minor positive effect to take into account mitigation.

5.331 Therefore, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have a **cumulative minor positive (+) effect** on SA Objective 5 (Water).

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

5.332 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.

5.333 The Settlement Hierarchy is not included in the JLP as proposed to be modified and there is no spatial strategy to determine the location of development, as extant planning permissions provide for the majority of housing requirements across the Plan period. The JLP is therefore limited in what it can do in terms of directing development to the most sustainable locations. Although Policy SP03 (The Sustainable Location of New Development) supports development within settlement boundaries, there may not be as many services and facilities in smaller settlements than there are in larger settlements. This may increase reliance on the private car, which could increase associated air and noise pollution.

5.334 Within Sections A and B of the JLP as proposed to be modified, there is a recognition that air quality is an issue that needs to be taken into account, and a number of policies seek to promote sustainable forms of transport, which are less polluting than combustion engines and likely to become more commonplace during the Plan period. Some of the policies also seek to mitigate against noise pollution. Therefore, a number of policies are also likely to have positive effects, some of which are significant.

5.335 Overall, given that there is only one AQMA within the Plan area but a reliance on the private car due to the rural nature of both Districts, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have a **cumulative mixed minor positive and minor negative (+/-) effect** on SA Objective 6 (Air and Noise).

SA Objective 7: To conserve soil and mineral resources

5.336 Only a small number of the JLP Section A and Section B policies are considered likely to have an effect on SA Objective 7, as this objective is mainly dependent on the location of development and whether it is brownfield of

greenfield land, and the JLP as proposed to be modified does not allocate sites for development. However, where effects are identified, they tend to be positive. The committed sites within Babergh and Mid Suffolk mainly comprise greenfield land, although there are a small number of sites on previously developed land.

5.337 Overall, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have a **cumulative mixed minor positive and minor negative (+) effect** on SA Objective 6 (Soils and Minerals).

SA Objective 8: To promote the sustainable management of waste

5.338 There are several references to the need for suitable waste management practices in policies in Sections A and B of the JLP as proposed to be modified. For example, Policy LP15 (Environmental Protection and Conservation) supports the re-use of existing resources and seeks to reduce the lifecycle impact of building materials used in construction, in addition to preventing, mitigating and reducing all forms of possible pollution, including waste. Likewise, Policy LP14 (Intensive Livestock and Poultry Farming) supports intensive livestock and poultry units and associated facilities, provided certain criteria are met including provision for the management and disposal of waste materials, liquids, litter and manure for each production cycle.

5.339 Overall, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have a **cumulative minor positive (+) effect** on SA Objective 8 (Waste).

SA Objective 9: To reduce contribution to climate change

5.340 As explained already, extant planning permissions provide for the majority of housing requirements across the Plan period and the JLP as proposed to be modified does not allocate sites for development. It is therefore limited in what it can do in terms of locating development in the most sustainable locations so as to reduce reliance on the private car and minimise associated emissions. Although Policy SP03 (The Sustainable Location of New Development) supports development within settlement boundaries, there may not be as many services and facilities in smaller settlements than there are in larger settlements. This may increase reliance on the private car and result in an increase in emissions associated with use of the private car.

5.341 Climate change is referenced throughout the JLP and there are several policies in Sections A and B of the JLP as proposed to be modified 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.

5.342 Overall, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have a **cumulative mixed significant positive and minor negative (++/-) effect** on 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

5.343 Extant planning permissions provide for the majority of housing requirements across the Plan period and the JLP as proposed to be modified does not allocate sites for development. The plan is therefore limited in what it can do in terms of preventing development in areas at risk of flooding. Most of the committed sites comprise greenfield land and so the scale of development to be delivered may increase flood risk.

5.344 Few of the Sections A and B 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 wastewater 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.

5.345 Therefore, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have a **cumulative mixed significant positive and minor negative (++/-) effect** on SA Objective 10 (Climate Change Adaptation).

SA Objective 11: To conserve and enhance biodiversity and geodiversity

5.346 Extant planning permissions provide for the majority of housing requirements across the Plan period and the JLP as proposed to be modified does not allocate sites for development. The plan is therefore limited in what it can do in terms of preventing development in areas containing biodiversity assets.

5.347 A large proportion of the policies in Sections A and B of the JLP as proposed to be modified 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. Additionally there are policies with an emphasis on restoration and enhancement with the aim of delivering biodiversity net gain. However, future growth within both Districts could have an adverse effect on biodiversity and geodiversity, particularly where development is supported outside of existing settlement boundaries in more rural and potentially sensitive areas, even where mitigation is proposed.

5.348 Therefore, overall, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have a **cumulative mixed significant positive and minor negative (++/-) effect** on SA Objective 11 (Biodiversity and Geodiversity).

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

5.349 Numerous historic assets are located across Babergh and Mid Suffolk and so it is highly likely that development could affect these assets and their settings. This is reflected in policies in Sections A and B of the JLP as proposed to be modified, which 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.

5.350 Overall, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have a **cumulative mixed minor positive and minor negative (+/-) effect** on SA Objective 12 (Historic Environment).

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

5.351 Sections A and B of the JLP as proposed to be modified include a number of very strong 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 which could be adversely affected by the development resulting from the JLP. 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.

5.352 Overall, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have a **cumulative mixed**

significant positive and minor negative (++/-) effect on SA Objective 13 (Landscape/Townscape).

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

5.353 Policies in Sections A and B of the JLP as proposed to be modified aim to protect and where appropriate expand the existing strategic employment sites, regenerate two strategic employment sites, 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.

5.354 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.

5.355 Overall, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have a **cumulative significant positive (++) effect** on SA Objective 14 (Economic Growth).

SA Objective 15: To revitalise the District's town centres

5.356 The JLP is limited in what it can do in terms of promoting development within the town centres, as extant planning permissions provide for the majority of housing requirements across the Plan period. A lot of these committed sites are within town centres, but many are not.

5.357 Sections A and B of the JLP as proposed to be modified 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.

5.358 Overall, it is considered that the JLP will have a **cumulative significant positive (++) effect** on SA Objective 15 (Town Centres).

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

5.359 Achieving a marked shift from reliance on the private car to more sustainable modes of transport, particularly public transport, in rural districts is a 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.

5.360 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.

5.361 There is no spatial strategy to determine the location of development within the JLP as proposed to be modified, as extant planning permissions provide for the majority of housing requirements across the Plan period. The JLP is therefore limited in what it can do in terms of locating development in the most sustainable locations where public transport is available and services and facilities are within easy walking and cycling distance.

5.362 Sections A and B of the JLP as proposed to be modified 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. Although Policy SP03 (The Sustainable Location of New Development) supports growth within existing settlement boundaries, this includes smaller, more isolated settlements. These settlements may not be easily accessible by public transport and therefore increase reliance on the private car. The same applies to the strategic employment sites, many of which are located along the strategic transport corridors within both Districts and so therefore increase reliance on the private car. Some of the policies refer to the provision of transportation infrastructure but which could make travel via the private car more attractive and therefore increase the number of cars on the road.

5.363 As a result, overall, it is considered that the JLP as proposed to be modified (the Part 1 Plan) will have a **cumulative mixed significant positive and minor negative (++) effect** for SA Objective 16 (Sustainable Travel).

Cumulative effects with other plans and projects

5.364 This section describes the current status of other plans and programmes that may combine with the JLP as proposed to be modified to give rise to cumulative effects, such as Local Plans of neighbouring authorities and nationally significant infrastructure projects.

Neighbouring authorities' local plans

5.365 Development in BMSDC will not be delivered in isolation from those areas around the Districts. The effect of new development and supporting infrastructure on neighbouring authority areas must therefore be considered as part of this 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

5.366 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 a Strategic Section 1 Local Plan when adopted.

5.367 The North Essex Authorities' Shared Strategic Section 1 Plan was found to be sound, legally compliant and capable of adoption, and was formally adopted by Tendring District Council on 26th January 2021, Colchester Borough Council on 1st February 2021 and Braintree District Council on 22nd February 2021.

5.368 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)

5.369 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. As stated in the Plan for Tendring/Colchester Borders Garden Community, the Councils seek to provide 7,000-9,000 new homes, as well as 25ha employment land, new 'centres', new schools and early years facilities. 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 5.4: Hectares of employment land required for office, research and development, industrial, storage and distribution uses

	Baseline	Higher Growth Scenario
Braintree	20.9	43.3
Colchester	22.0	30.0
Tendring	12.0	20.0
North Essex	54.9	93.3

Tendring District Council

5.370 The North Essex Authorities' Shared Strategic Section 1 Local Plan was formally adopted by Tendring District Council on 26th January 2021. Section 1 of Tendring District Council's Local Plan seeks to make Tendring District more self-reliant by achieving a sustainable balance between jobs, retail development, tourism, leisure, hotel and guesthouse development and associated facilities and to improve education and skills for the District's residents.

5.371 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. Following Examination, Section 2 of Tendring District Council's Local Plan was formally adopted.

Colchester Borough Council

5.372 The North Essex Authorities' Shared Strategic Section 1 Local Plan was formally adopted by Colchester Borough Council on 1st February 2021. 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. Following Examination, Section 2 of Colchester Borough Council's Local Plan was formally adopted in July 2022.

5.373 According to Section 2 of the Local Plan, Colchester will contribute to the social element of sustainable development through the allocation of 14,720 homes between 2017 and 2033, which meets the Borough's objectively assessed need for housing. This growth will be located at the most accessible and sustainable locations. The Plan also seeks to deliver economic growth in response to new challenges and trends, noting that Colchester has maintained good levels of employment growth over the last two decades with declining industrial employment being offset by a growth in office jobs.

Braintree District Council

5.374 The North Essex Authorities' Shared Strategic Section 1 Local Plan was formally adopted by Braintree District Council on 22nd February 2021. As with the other North Essex Authorities, Section 2 of Braintree District Council's Local Plan was published in October 2017. Section 2 of the Local Plan was subsequently adopted on 25th July 2022, and contains policies, maps and sites for development, housing, employment and regeneration, within Braintree District Council.

5.375 According to Section 2 of Braintree District Council's Local Plan, Braintree District Council will plan, monitor, and manage the delivery of a minimum of 14,320 new homes between 2013 and 2033. These homes will be located primarily in the Main Towns and Key Service Villages, and in

strategic growth locations, particularly East of Great Notley (in Black Notley Parish) (1,750 new homes), and Land East of Broad Road, Braintree (1,000 new homes). With regard to employment land, (Policy SP5) the Section 1 Local Plan has confirmed that Braintree should deliver between 20.9 and 43.3ha of new employment land.

West Suffolk Council

5.376 Forest Heath District Council and St Edmundsbury Borough Council were replaced by a single District Council on 1st April 2019, called West Suffolk Council. The adopted Local Plans covering the former Forest Heath and St Edmundsbury areas respectively will continue to apply to those parts of West Suffolk Council until a new Local Plan is adopted, which is scheduled for winter 2024. The West Suffolk Local Plan Preferred Options was consulted on between 26th May and 26th July 2022.

5.377 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 authority's Local Plan.

Former Forest Heath District Council area

5.378 The former Forest Heath District Council'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. A Site Allocations Local Plan (2019) also forms part of the Local Plan and sets out site allocations within the former District.

5.379 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

5.380 The former St Edmundsbury Borough Council'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

5.381 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

5.382 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.

5.383 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.

5.384 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 Regulation 19 Pre-Submission Plan was consulted on between 1st February and 22nd March 2021 and submitted for Examination on 20th July 2021. The Plan seeks to deliver 35,301 new homes, which equates to 1,961 new homes per annum. In addition, a minimum of 1,200 of these homes will be allocated in the South Norfolk Village Clusters Housing Site Allocations document, and 250 will be provided through allocations in the Diss and area Neighbourhood Plan. To provide additional flexibility to ensure housing need can be met, a contingency site at Costessey for around 800 homes is included in the Plan, should this prove to be required due to low delivery of allocated housing sites. The document also allows for limited further development on small sites of 3 dwellings in smaller parishes and five dwellings in larger parishes during the Plan period.

5.385 With regard to employment development, the overall target for jobs is for an increase of 33,000 jobs from 2018 to 2038. The Plan therefore allocates employment sites totalling around 360ha including key strategic employment land in Norwich City Centre, the Norwich Airport area, Rackheath, Broadland Business Park, Broadland Gate, Norwich Research Park, Wymondham/Hethel, Longwater and the Food Enterprise Park.

5.386 It is anticipated that the Greater Norwich Local Plan will be adopted at the start of 2024.

East Suffolk Council

5.387 Suffolk Coastal District Council and Waveney District Council were replaced by a single District Council on 1 April 2019 called East Suffolk Council.

Suffolk Coastal Local Plan

5.388 The East Suffolk Council Suffolk Coastal Local Plan was adopted on 23rd 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

5.389 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

5.390 On 23rd March 2022, Ipswich Borough Council adopted the Ipswich Local Plan Review 2018-2036. The Local Plan Review comprises the Core Strategy and Policies Development Plan Document Review, in addition to a Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document, Policies Map and the IP-One Area Action Plan Inset Policies Map.

5.391 According to the Core Strategy and Policies Development Plan Document Review, 9,777 dwellings will be provided for the period 2011-2031 (489 dwellings per annum). The Ipswich Garden Suburb development will contribute significantly to meeting the housing needs of the Borough throughout the Plan period. The Council will additionally allocate land to provide for at least 5,344 dwellings (net) in the Borough, with a lower amount of 4,544 expected by 2031 to account for a long build out period for the development of the Ipswich Garden Suburb.

5.392 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. 650 dwellings are expected to be delivered on small windfall sites between 2023 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 (3,295 minus 1,915 dwellings that have outline planning permission):** 1,380
- **Northern end of Humber Doucy Lane allocated through Policy ISPA4 (Ipswich Strategic Planning Area 4):** 449
- **Site Allocations through policies in the SAP and AAP:** 2,880
- **Windfall sites (2023-2036):** 650 (50 per annum).

5.393 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 E(g), B2 and B8). The Council will also protect existing employment land for employment use.

Suffolk County Council

Minerals and Waste Local Plan

5.394 The Suffolk Minerals and Waste Local Plan (SMWLP) was adopted in July 2020.

5.395 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 seven years based upon the average of the last ten years' sales.

5.396 Although there are significant quantities of Local Authority Collected Waste, Commercial and Industrial Waste, Construction, Demolition and 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

5.397 Suffolk Local Transport Plan covers the period 2011 to 2031. It is in two parts:

- Part 1: Strategy.
- Part 2: Implementation Plan.

5.398 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

5.399 Neighbourhood Development Plans (NDPs), once adopted, form part of the development plan for a local authority area.

5.400 There are currently 30 'made' (adopted) Neighbourhood Development Plans (NDPs) within BMSDC. These are outlined below.

Babergh

- **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.
- **Assington Neighbourhood Plan 2018-2036 (2022):** The Neighbourhood Plan therefore makes provision for at least 67 new homes to be built in the village between 2018 and 2036. One of the ways that the Plan seeks to achieve this growth is through brownfield "windfall" sites within the Settlement Boundary that come forward during the plan period and are not identified in the Plan. Ten Local Green Spaces have also been designated.
- **Bentley Neighbourhood Plan 2018-2037 (2022):** The Neighbourhood Plan area is located within a 13 kilometres "Zone of Influence" (ZOI) of the Stour and Orwell Special Protection Area (SPA) and Stour and Orwell Estuaries RAMSAR. The Neighbourhood Plan therefore contains a policy on recreational disturbance avoidance and mitigation, to avoid adverse recreational disturbance effects on European sites.

- **Boxford Neighbourhood Plan 2021-2037 (2022):** The Pre-Submission (Regulation 19) Version of the BMSJLP indicated a minimum figure of 13 dwellings for Boxford to be accommodated over the period. The Neighbourhood Plan has adopted this as its indicative housing requirement up to 2037. New development in Boxford will be focused within the defined settlement boundaries of Boxford village, Stone Street and Calais Street. New developments of individual dwellings or small groups of houses, within the settlement boundaries will be supported.
- **Chelmondiston Neighbourhood Plan 2020-2036 (2022):** An important role for the Chelmondiston Neighbourhood Plan (known as the Chelpin Plan) is to help manage future housing growth in Chelmondiston, Pin Mill and Lings Lane. This will be within the defined settlement boundaries. As well as housing within the village and hamlets, there are a number of houseboats on the river at Pin Mill; adjacent to the Butt & Oyster Public House, which are part of the distinctive character of the area and provide a unique type of housing. Houseboats should respect the natural environment within which they are situated and not result in any adverse effect on the Stour and Orwell Estuaries Special Protection Area and Ramsar site or the Suffolk Coast and Heaths Area of Outstanding Natural Beauty. The Plan also makes note of six Local Green Spaces which have been designated.
- **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.
- **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.
- **Little Cornard Neighbourhood Plan 2020-2037 (2022):** The Neighbourhood Plan sets out the delicate balance between providing for the needs of the community of Little Cornard – principally housing – and preserving and maintaining the unique countryside of Stour Valley. As such, there is a policy on Cornard Mere and Great Cornard County Park, which seeks to restore fragmented habitat networks and demonstrate net gains to biodiversity. With regard to housing, the Plan provides a minimum of 3 dwellings to be developed to up 2036.
- **Little Waldingfield Neighbourhood Plan 2018-2036 (2022):** This Plan provides for around 10 additional dwellings to be developed in the Neighbourhood Plan area between 2018 and 2036. This growth will be met through the allocation of sites as identified in separate policies in this Plan and on the Policies Map; and through small brownfield windfall sites and infill plots of one or two dwellings within the Settlement Boundary. The establishment of a Community Land Trust (CLT) will be considered should there be an identified local need for affordable housing for those with a local connection. Six Local Green Spaces have been designated in the Plan.
- **Long Melford Neighbourhood Plan 2018-2037 (2022):** The Plan states that the focus for any new development will be within the Settlement Boundary. The Plan provides for around 444 dwellings to be built over the period 2018 to 2037, which will be met through the implementation of outstanding planning permission not completed at 1st April 2018 (217 dwellings), and the allocation at Station Road set out in the Joint Local Plan (150 dwellings), as well as the site allocations identified

in policies LM2 to LM7 of this Plan (which will provide for around 77 dwellings):

- LM 2: Land at Spicers Lane (Indicative 1 dwelling);
- LM 3: Land at Cordell Road (Indicative 3 dwellings);
- LM 4: Land rear of Bull Hotel (Indicative 3 dwellings);
- LM 5: Land at Borley Road (Indicative 10 dwellings);
- LM 6: Land west of High Street (A maximum of 30 dwellings);
- LM 7: Land east of Rodbridge Hill (A maximum of 30 dwellings).

The Plan also draws on sustainable growth, with a policy on preventing coalescence between Long Melford and Sudbury as the two communities have very distinctive identities and development between the two has the potential to see their identities compromised.

- **Newton Neighbourhood Plan 2018-2036 (2022):** The Plan states that there is a 5-year supply of housing, although this a 'rolling' assessment so any time this position could change. Further to this, with regard to housing growth the Plan notes that growth must be in scale to the role of the village. Development will be prioritised on underused parcels, and must reflect the character of the surrounding area. The Plan also makes note of the local character of Newton, with 37 buildings which are Grade II listed properties. There is also a policy promoting renewable energy, as it noted that a high proportion of households in Newton rely on oil central heating.
- **Whatfield Neighbourhood Plan 2018-2037 (2022):** The Plan sets out detailed principles for development in relation to the landscape, important views, and natural features, noting the importance of the high-value landscape of Whatfield, characterised by manorial halls, ancient hedge lines, as well as airfields and landing strips. New development in Whatfield will be focused within the defined settlement boundary for Whatfield. Further to this, development proposals for 'windfall development' 'in the form of individual dwellings or small groups of houses up to 5 dwellings will be supported where they meet the criteria of the policies set out in this plan. the Plan provides a detailed Whatfield Design Guide, referencing the style, materials, layout and amenity, and parking. This Guide notes that architectural style of new dwellings should be a sensitive combination of high quality modern contemporary designs which respects the traditional Suffolk vernacular and enhances the character and quality of development within the parish.

Mid Suffolk

- **Botesdale and Rickingham 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.
- **Drinkstone Neighbourhood Plan 2018-2036 (2021):** Planning consent for eight additional homes was granted as of July 2019, including two conversions located outside the Settlement Boundaries. As such no additional sites have been identified for housing in this plan. these sites are:
 - Land west of The Street (1 dwelling);
 - Abbots Lodge, The Street (1 dwelling);
 - Adjacent to Greyfriars, Rattlesden Road (2 dwellings);
 - Briar Cottage, Gedding Road (1 dwelling);
 - Land west of Shortgate, Beyton Road (2 dwellings)

Although no additional sites have been identified, it has been acknowledged in the plan that there will continue to be opportunities within the Settlement Boundaries for small 'windfall' sites to come forward as a result of, for example, redevelopment or plot rationalisation. As such, the Plan provides for around 10 additional dwellings to be developed in the Neighbourhood Plan area between 2018-2036 through windfall sites. Further to this, the plan has designated ten Local Green Spaces, of which development will be only permitted in very special circumstances.

- **Eye Neighbourhood Plan 2018-2036 (2021):** This Plan provides for around 716 homes to be developed in the Neighbourhood Plan area between 2018 and 2036. This growth will be met through the allocation of the following

sites for 10 or more new homes as indicated on the Policies Map:

- Land South of Eye Airfield - around 280 homes;
- Paddock House, Church Street - around 16 homes;
- Land north of Victoria Mill Allotments - around 34 homes;
- Victoria Mill Allotments - around 72 homes;
- South of Eye Airfield Phase 2 - around 174 homes;
- Chicken Factory, Yaxley Road - around 80 homes.

Housing will also be delivered through an approach to housing an allowance of 60 homes on small 'windfall' sites of less than 10 homes that come forward within the settlement boundary during the Plan period and are not identified elsewhere within the Plan. With regard to affordable housing, residential development sites in the Plan area should provide for 163 affordable homes and 70 sheltered homes. There should be at least 40 small homes to buy through shared ownership, 18 homes at (less than 80% of market) social rent and 27 homes at (80% of market rent) affordable rent.

- **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.

- **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.

- **Laxfield Neighbourhood Plan 2018-2036 (2022):** This Neighbourhood Plan provides for around 110 dwellings

to be developed between 2018 and 2036. The growth will be met through the allocation of Land off Cullingford Close (13 dwellings), sites that already have planning permission, as well as small brownfield windfall sites and dwellings outside of the Settlement Boundary in accordance with national and strategic policies. The Plan seeks to establish a Community Land Trust to investigate options for low-cost housing in or near Laxfield's Settlement Boundary. The Plan also contains six designated Local Green Spaces.

- **Mendlesham Neighbourhood Plan 2018-2037 (2022):**

This Plan provides for a minimum total of 161 new homes over the plan period 2018-2037. It is stated that all new developments should include tree-lined streets unless in specific cases where this would be inappropriate. Three sites have been identified for residential development, specifically:

- Land North of Mason Court (minimum 18 dwellings);
- Land to the West of Mason Court and adjacent to Horsefair Close (minimum 10 dwellings all to be affordable);
- Land South of Glebe Way, and South of the Ropers Farm Estate (approximately 75 dwellings, with an agreed percentage of affordable housing). The Plan goes to mention that the whole site is the only one possessing the unique ability to protect the historic heart of Mendlesham Village by diverting a significant amount of existing and future local traffic away from the Conservation Area. The Plan also seeks to stimulate the rural economy particularly by supporting proposals to develop small business hubs within the parish.

- **Needham Market Neighbourhood Plan 2020-2037 (2022):** The Plan provides for 512 dwellings to be delivered up to 2037, specifically:

- Land west of Stowmarket Road – 66 dwellings;
- Former Needham Market Middle School – 41 dwellings (affordable units);
- Former Mid Suffolk District Council Offices – 94 dwellings.

The Plan also encourages commercial activity, and employment opportunities particularly toward the Lion Barn Estate, as well as reinforcing the commercial role of Needham Market Town Centre through focussing retail and leisure proposals within existing town centres, with retail uses focussed within primary shopping areas.

- **Redgrave Neighbourhood Plan 2018-2037 (2022):** This Neighbourhood Plan provides for a minimum of 24

dwellings to be developed in the Neighbourhood Plan area between April 2018 and March 2037, of which 16 already have the benefit of planning permission. The housing target will be met through:

- Allocation of a site at Churchway for approximately 8 dwellings (0.53ha);
- small ‘windfall’ sites and infill plots within the Settlement Boundary that come forward during the Plan period and are not specifically identified in the Plan;
- conversions and new development opportunities outside the Settlement Boundary, where it can be demonstrated that there is a need for the dwelling which is essential for the operation of agriculture, horticulture, forestry, outdoor recreation, and other exceptional uses.

- **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.

There are three Local Green Spaces designated in the plan. These are:

- Land known as ‘The Flat Iron’ between Half Moon Lane and Hall Lane;
- Land known as ‘The Knoll’ in front of the Cross Keys Public House, Churchway;
- The Playing Field (including the Children’s Play Area) adjacent to the Redgrave Activities Centre on Churchway.

- **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.

- **Thorndon Neighbourhood Plan 2018-2036 (2022):**

This Plan provides for around 100 additional dwellings to be developed in the Neighbourhood Plan area between 2018 and 2036. This includes the three dwellings constructed on Land to the West of Hall Road, as well as the implementation of planning permissions that had not been completed as at 1 April 2018, and site allocations identified in the Neighbourhood Plan which include:

- A site of 1.22 hectares at the former Kerrison Centre, allocated for approximately 20 dwellings including 35% affordable dwellings;
- A site of 0.35 hectares at Brambledown, south of Stoke Road allocated for approximately 4 dwellings;
- A site of 0.7 hectares east of Fen View allocated for approximately six dwellings.

The Plan also designates four Local Green Spaces:

- Kerrison Playing Field;
- Fen View Play Area and Open Space;
- All Saints' Churchyard;
- The Bowling Green

The Plan also draws on the importance of the River Dove for biodiversity. This River runs along the neighbourhood boundary and the corridor, hence there is a policy regarding the River, noting that development within 10 metres of the River Dove will not be supported.

- **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.

- **Wilby Neighbourhood Plan 2018-2036 (2021):** The Plan provides for around of 16 dwellings, of which 11 dwellings have planning permission. Wilby also has very limited services and access to public transport. The Plan has taken this into account, and has included an allocation for 5 dwellings to allow for any unmet future housing need. The Plan also makes a small allowance for windfall development, which is most likely to come from the conversion of existing buildings outside of the

settlement boundary due to very little scope for new development within the boundary. The Plan also states that visual scenic value of the landscape and countryside in the Neighbourhood Area outside the defined settlement boundary will be protected from development that may adversely affect this character, and also mentions the significance of protecting important views. The Plan also contains a detailed policy regarding renewable energy and future sustainability, although this only applies to non-residential development.

- **Woolpit Neighbourhood Plan 2016-2036 (2022):** The scale of the need is small, so the recommendation for the provision of affordable homes to meet the need was 18-20 dwellings. Although, there are two applications which have already been granted permissions. These are:
 - Land south of Old Stowmarket Road - commitment for up to 120 homes, including 42 affordable homes;
 - Land east of Green Road – 49 new homes, including 17 affordable homes.

The Plan also contains a policy on housing for the elderly, which supports developments which incorporate specific provision for the elderly. The Neighbourhood Plan also designates fifteen Local Green Spaces.

5.401 There are a further 35 Neighbourhood Development Plans in progress within BMSDC, excluding those which are reviewing originally adopted documents. These are outlined below.

- Hoxne NDP (Reg 16 submission consultation February to March 2023)
- Beyton NDP (submitted late January 2023)
- Elmswell NDP (submitted late January 2023)
- Ashbocking NDP (area designated November 2019)
- Acton NDP (area designated October 2021)
- Bacton NDP (area designated July 2022)
- Bures NDP (area designated January 2022)
- Badwell Ash & Long Thurlow NDP (area designated September 2022)
- Battisford NDP (area designated December 2018)
- Brettenham NDP (area designated January 2021)
- Capel St Mary NDP (Reg 14 Pre-Submission consultation closed April 2020)
- Chilton NDP (area designated December 2017)

- Copdock and Washbrook NDP (rejected at Referendum on 24 March 2022)
- Old Newton and Dagworth with Gipping NDP (area designated February 2020)
- Walsham le Willows NDP (Reg 14 Pre-Submission consultation ended December 2022)
- Wetheringsett cum Brockford NDP (Reg 16 submission consultation January to March 2023)
- Diss and District NDP (Examination commenced Jan 2023)
- East Bergholt NDP (proposed modifications)
- Edwardstone NDP (area designated March 2021)
- Glemsford NDP (area designated October 2017)
- Great Waldingfield NDP (Regulation 14 Pre-Submission consultation closed August 2022)
- Groton NDP (area designated July 2022)
- Hadleigh NDP (area designated June 2015)
- Hartest NDP (Reg 14 Pre-Submission consultation closed March 2021)
- Hitcham NDP (area designated January 2020)
- Lawshall NDP Review (Reg 14 Pre-Submission consultation October to November 2022)
- Stoke by Nayland NDP (area designated December 2017)
- Tattingstone NDP (area designated July 2021)
- Woolverstone NDP (area designated October 2018)
- Lavenham NDP Review (Reg 14 Pre-Submission consultation December 2022 to February 2023)
- Sproughton NDP (Reg 16 submission consultation December 2022 to February 2023)
- Stutton NDP (Reg 18 Statement issued 11 January 2023)
- Leavenheath NDP (Reg 18 Statement issued 31 January 2023)
- Holbrook NDP (examination underway)
- Wherstead NDP (examination start date to be confirmed)

Nationally Significant Infrastructure Projects

5.402 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

5.403 A rapid response gas-fired power plant referred to as Progress Power, was granted planning permission on 23rd 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.

5.404 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.

5.405 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.

5.406 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

5.407 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, and granted planning permission on 20 July 2022 by the Secretary of State for Business, Energy and Industrial Strategy. The UK EPR design being used has undergone years of evaluation by the Office for Nuclear Regulation and Environment Agency and will use less uranium and produce almost a third less long-lived radioactive waste compared to other current water reactors in operation.

5.408 It has been noted that Sizewell C will have no impact whatsoever on the supply of water to homes and businesses in East Suffolk.

5.409 Further to this, there will be a number of measures implemented to reduce the impact of construction. For example, up to 60% of construction materials will be transported to site by rail and sea, significantly reducing the number of HGVs on local roads, and measures to reduce noise will include screening, use of quieter working methods and a noise mitigation scheme for properties significantly impacted.

Bradwell C

5.410 Bradwell C is a proposed nuclear power station at Bradwell-on-Sea in Essex. It is being progressed by joint partners CGN and EDF.

5.411 Their proposals are for a twin reactor power station, able to generate 2.2GW of low carbon electricity, enough to power around four million homes.

Cumulative effects assessment with other plans and projects

5.412 The development proposals in the plans and projects described above have the potential to combine with the development proposed in the Babergh Mid Suffolk JLP as proposed to be modified. These cumulative effects relate mainly to the Local Plans of neighbouring authorities.

5.413 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.

5.414 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

5.415 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.

5.416 There is the potential for positive health effects from employment arising from economic development proposals in neighbouring authorities, in particular St Edmundsbury, Ipswich, and Breckland, as well access to community recreation and facilities supported by plans in neighbouring authorities.

5.417 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.

5.418 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. This is also the case for Sizewell C, on the Suffolk Coast, as HGV, LGV and abnormal load movements during the construction phase could create some localised cumulative effects on SA Objective 1 in this part of the JLP area.

5.419 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

5.420 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

5.421 However, the increase in residents could provide additional demand for further education facilities in Ipswich, and South Norfolk. The creation of a new Garden Community at the Tendring/Colchester border and subsequent large increase in residents will provide additional demand for further education facilities in Tendring and Colchester. Although, the proposals for the Garden Community note that the Community will be served by community services and facilities, such as schools and sport facilities, as well as accommodate the future expansion of the University of Essex 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

5.422 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. 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. The Needham Market Neighbourhood Plan also encourages commercial activity and employment opportunities particularly towards the Lion Barn Estate, and focuses on proposals within existing town centres. Further to this, Progress Power and Sizewell C, as well as the proposed Bradwell C nuclear power

station will generate employment opportunities in the Districts, and neighbouring authorities.

5.423 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

5.424 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. Further to this, the proposed Tendring Colchester Borders Garden Community will allow for a substantial number of new homes to be provided.

5.425 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

5.426 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. There are particular areas under significant water stress, such as within the Hartismere Water Resource Zone in north east Mid Suffolk. Here, there are short- and medium-term potable water capacity issues resulting in restrictions upon new non-domestic water supply until 2032.

5.427 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.

5.428 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

5.429 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.

5.430 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 neighbouring authorities.

5.431 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

5.432 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. Many of the neighbourhood plans, particularly Little Waldingfield and Laxfield mention that some of the residential growth will be met through small brownfield windfall sites. 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

5.433 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.

5.434 Overall, it is considered that the JLP will have a **cumulative negligible (0) effect** on SA Objective 8 (Waste) with other plans and projects.

SA Objective 9: To reduce contribution to climate change

5.435 There is little doubt that the amount of development proposed 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.

5.436 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.

5.437 As a result, carbon emission from development planned are likely to be less than would otherwise be the case. Further to this, Progress Power, the gas-fired power plant north west of Eye, Sizewell C, a proposed nuclear power station on the Suffolk Coast, as well as the proposed Bradwell B nuclear power station in Essex, will help the country to transition to a lower carbon economy through the provision of low-carbon electricity to homes across the country. These projects will also pave the way for other low-carbon technologies, including hydrogen production and Direct Air Capture (DAC). These technologies are important to the UK achieving net zero. Overall, it is considered that the JLP will have **cumulative mixed significant positive and minor negative (++) effect** 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

5.438 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.

5.439 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.

5.440 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

5.441 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.

5.442 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.

5.443 The Neighbourhood Plans also reference conservation and enhancement of biodiversity and geodiversity, particularly through the designation of Local Green Spaces, and conservation of the distinctiveness of the AONBs.

5.444 Nonetheless, there is a considerable amount of committed 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.

5.445 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

5.446 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.

5.447 As a result, the effects on the historic environment are addressed through the SAs of each individual Local Plan, as well as the Neighbourhood Plans. 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

5.448 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.

5.449 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. The Neighbourhood Plans also set out detailed principles for development in relation to the landscape, important views, and natural features. This is particularly the case for Redgrave and Whatfield, which contain policies relating to development within Areas of Local Landscape Sensitivity, and protecting of sensitive landscapes.

5.450 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

5.451 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, Sizewell C, and Bradwell should create jobs that will benefit residents of Babergh and Mid Suffolk. Further to this, the creation of the Tendring Colchester Borders Garden Community will help to support new jobs, and long-term investment into the Garden Community will be beneficial for local residents and businesses.

5.452 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

5.453 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.

5.454 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.

5.455 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

5.456 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.

5.457 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.

5.458 The creation of the Tendring Colchester Borders Garden Community seeks to encourage sustainable transport networks, linking Colchester to the new Garden Community, although due to distance from cities and towns the creation of the Garden Community may also encourage car dependent lifestyles.

5.459 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

5.460 A Habitats Regulations Assessment (HRA) of the JLP as proposed to be modified (the Part 1 Plan) 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).

5.461 The purpose of the HRA is to determine whether the JLP as proposed to be modified, 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).

5.462 The European Sites considered within this HRA were:

- Stour and Orwell Estuaries Special Protection Area (SPA).
- Stour and Orwell Estuaries Ramsar site.
- Deben Estuary SPA.
- Deben Estuary Ramsar site.
- Minsmere – Walberswick SPA.
- Minsmere – Walberswick Ramsar site.
- Minsmere to Walberswick Heaths and Marshes Special area of Conservation (SAC).
- Redgrave and South Lopham Fens Ramsar site.
- Waveney and Little Ouse Valley Fens SAC.

5.463 The HRA reviewed the proposed Main Modifications, determining that only three Main Modifications contained additional proposals that would require further consideration within the HRA: MM19 and MM20 – both of which relate to promoting growth in the employment areas of Sproughton and Branham (Policy SP05 – Employment Land), and MM33, which includes the provision of a new policy for rural working dwellings (Policy LP05 – Rural Worker Dwellings).

5.464 Potential impact pathways between the above European sites and the JLP as proposed to be modified were identified, considered and assessed. These related to disturbance and water quality. As a result, likely significant effects on European Sites could not be ruled out in the screening process and an Appropriate Assessment was undertaken.

5.465 Importantly, the Site Improvement Plans for the Waveney and Little Ouse Valley Fens SAC identified that water quality was a significant factor affecting site integrity for the European sites, albeit the primary cause of this adverse impact is identified as being caused by nutrient enrichment from agricultural run-off, particularly from nearby outdoor poultry and pig units.

5.466 The HRA acknowledges that no site allocations are included within the Part 1 Plan. In addition, mitigation has been embedded within Policy LP14 (Intensive Livestock and Poultry Farming) and no existing employment sites are present within a 5km radius. Therefore, it was considered reasonable to rule out effects from water quality impacts upon the Waveney and Little Ouse Valley Fens SAC.

5.467 The HRA including Appropriate Assessment concluded that the Part 1 Plan is not predicted to have any adverse effect on the integrity of European sites, either alone or in-combination with other plans and projects.

Chapter 6

Monitoring

6.1 This chapter recommends indicators to monitor the effects of implementing the Joint Local Plan as proposed to be modified.

6.2 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.

6.3 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.

6.4 Table 6.1 sets out a number of suggested indicators for monitoring the potential sustainability effects of implementing the JLP as proposed to be modified. 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 6.1: Proposed monitoring indicators

SA Objectives	Proposed Monitoring Indicators
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	■ Performance against relevant indices of multiple deprivation indicators ■ Percentage of adult participation in sport ■ Obesity levels ■ Access to doctors surgeries and average wait times for appointments ■ Number of S.106 contributions secured for health, education and community services ■ Residents' opinions on availability of open space/leisure facilities ■ Life expectancy ■ Net additional number of dwellings meeting space standards ■ Net additional new homes built to accessible and adaptable dwelling standards (Part M4(2)) ■ Net losses or gains of open space by sqm ■ Net loss/hain of community services and facilities ■ Net change of use of land to Use Class F (either for full flexibility or one or more uses within Use Class F) ■ Net loss/hain of health and educational uses
2. To maintain and improve levels of education and skills in the population overall.	■ GCSE or equivalent performance ■ Level 2 qualifications by working age residents ■ Level 4 qualifications and above by working age residents ■ Employment status of residents ■ Net additional square metres of educational floorspace by primary, secondary, further, higher and vocational levels ■ S.106 contributions secured for education and training services ■ Average gross weekly earnings ■ Number of young people in higher or further education or vocational levels ■ Performance against relevant indices of multiple deprivation indicators ■ Net change of use of land to Use Class F (either for full flexibility or one or more uses within Use Class F) ■ Net loss/hain of health and educational uses
3. To reduce poverty and social exclusion and ensure access to jobs and services.	■ Employment/unemployment rate in both Districts ■ % of population within 30 minute public transport time of educational, healthcare and community facilities ■ S/106 contributions accumulated per annum for improvements to public transport, leisure services, education, health and community services ■ Performance against relevant indices of multiple deprivation indicators ■ Net additional new homes built to accessible and adaptable dwelling standards (Part M4(2))
4. To meet the housing requirements of the whole community.	■ Net additional new housing ■ Number of windfall homes completed ■ Local Affordability Ratio ■ Five-Year Housing Land Supply (expressed as a percentage and years) ■ Housing Delivery Test (expressed as a percentage) ■ Percentage of each dwelling type, size and tenure of development completed

SA Objectives	Proposed Monitoring Indicators
	■ Net additional affordable housing, including percentage of community-led and rural exception housing, and as percentage of total net additional new housing ■ Number of eligible schemes not achieving 35% affordable housing ■ Statutory Homelessness ■ Net additional number of dwellings meeting space standards ■ Net additional new homes built to accessible and adaptable dwelling standards (Part M4(2)) ■ Net additional care/nursing homes ■ Net additional sheltered homes ■ Net gain and loss of rural workers housing with restrictions ■ Net addition of Gypsy and Traveller pitches and travelling show people plots ■ Number of households registered on the 'Self-Build Register' ■ Number of serviced dwelling plots completed, for self/custom build
5. To conserve and enhance water quality and resources.	■ Percentage of permissions that meet improved water efficiency standards ■ BREEAM certifications on non-residential development over 1,000 sqm ■ Number of new developments incorporating Sustainable urban Drainage Systems (SuDS) ■ Adoption of Water Resources Management Plan by water companies ■ Water use per household ■ Water pollution incidents recorded by the Environment Agency ■ Percentage of water bodies at good ecological status or potential ■ Percentage of water bodies at good or high biological status ■ Percentage of water bodies at good chemical status
6. To maintain and where possible improve air quality and reduce noise pollution.	■ Percentage of journeys to work by public transport or active transport ■ Air pollution data ■ Road and rail noise levels produced by Defra
7. To conserve soil and mineral resources.	■ Net percentage of development (in hectares) taking place on previously developed land ■ Amount of agricultural land in hectares permitted for non-agricultural use ■ Number of planning applications approved within a Minerals Consultation Area
8. To promote the sustainable management of waste.	■ Non-recyclable waste generation per capita ■ Percentage of household waste that was reused, recycled or composted
9. To reduce contribution to climate change.	■ Percentage of permissions that meet the Target Emission Rate ■ BREEAM certifications on non-residential development over 1,000 sqm ■ Number of renewable energy schemes permitted and net additional (kW/MW) generated ■ Number of community-led renewable energy schemes permitted and net additional (kW/MW) generated ■ Percentage of energy supplied from renewable sources ■ Percentage of journeys made by public transport or active transport ■ Energy consumption GWh/household ■ Air Quality Management Areas ■ Nitrogen dioxide emissions ■ PM2.5 emissions

SA Objectives	Proposed Monitoring Indicators
	■ PM10 emissions
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	■ Development identified in Flood Zones 2 and/or 3 ■ Number of new developments incorporating Sustainable urban Drainage Systems (SuDS) ■ Incidence of flood warnings in site area
11. To conserve and enhance biodiversity and geodiversity.	■ Number and hectares of Sites of Special Scientific Interest (SSSI) ■ Percentage of Districts' SSSIs in a favourable or unfavourable condition ■ Specific environmental indicators to be set out in Suffolk Coast Recreational disturbance Avoidance and Mitigation Strategy ■ Condition Status of all designated habitat sites and protected species ■ Net loss of designated sites and protected species ■ Measurable net gain in biodiversity (10%) ■ Net loss of ancient/veteran trees (Tree Preservation Orders) ■ Net loss of ancient woodland ■ Air Quality Management Areas and threshold areas. Where appropriate, nitrogen dioxide and ammonia monitoring from any road 300m from SPA [Ipswich Strategic Transport Mitigation Strategy]) ■ Delivery of projects identified through the Recreational disturbance Avoidance and Mitigation Strategy ■ Achievement of Biodiversity Action Plan targets
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	■ Number of Listed Buildings ■ Number of Scheduled Monuments ■ Number of Conservation Areas ■ Number of Archaeological Priority Areas ■ Number of entries on Heritage at Risk list ■ Number of entries removed from Heritage at Risk list ■ Number of non-designated heritage assets ■ Number of planning applications approved in Archaeological Priority Areas
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	■ Number of major applications granted within the Areas of Outstanding Natural Beauty ■ Developments permitted contrary to Landscape Sensitivity Assessment (sites with high sensitivity) ■ Percentage of development built on brownfield sites/previously developed land ■ Hectares of open space in both Districts
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	■ Net gain/loss per sqm of development on strategic employment sites ■ Net gain/loss per sqm of employment land across the Districts ■ Net gain/loss per ha of employment land across the Districts ■ Occupied plots on schemes ■ Change of use to Use Class E within and outside of defined Town Centres and net additional Use Class E on greenfield sites ■ Tourism jobs as a percentage of total employment ■ Monetary value of the tourism economy ■ Number of people claiming jobseekers allowance

SA Objectives	Proposed Monitoring Indicators
15. To revitalise the District's town centres.	■ Change of use to Use Class E within and outside of defined Town Centres and net additional Use Class E on greenfield sites ■ Use Class E net gains and losses by use within town centres ■ Number of shops within town centres ■ Number of vacant units in town centres ■ Net additional square metres of retail floorspace ■ Pedestrian footfall count ■ Net dwelling completions per annum within town centres
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	■ Delivery of sustainable and active transport projects as identified in the Infrastructure Delivery Plan, the Ipswich Strategic Planning Area Transport Mitigation Strategy and the Babergh and Mid Suffolk Local Cycling and Walking Infrastructure Plan ■ Percentage of journeys made by public transport or active transport ■ Car ownership ■ Public transport punctuality and efficiency

Chapter 7

Conclusions

7.1 This chapter summarises the key findings of the Main Modifications SA.

7.2 The Babergh and Mid Suffolk JLP as proposed to be modified (the Part 1 Plan) sets out a framework for development in the Plan area over a 19-year period, from 2018 to 2037. It includes a vision and set of objectives, in addition to 10 strategic policies and 32 non-strategic development management policies. Most of these policies were previously included in the Regulation 19 version of the JLP that was submitted for Examination in March 2021 but have been revised or reworded to varying degrees. There are a small number of new policies as highlighted at the start of **Chapter 5**.

7.3 A number of policies are proposed to be deleted from the JLP as submitted, as they will instead be contained within the forthcoming Part 2 Plan. The Part 2 Plan will include the spatial strategy for the area, settlement hierarchy and any necessary housing allocations as well as settlement boundaries, open space designations, and meeting the needs of Gypsies, Travellers and Travelling Showpeople, and Houseboat Dwellers. The Part 2 JLP will be subject to its own SA process as it is prepared, in line with legal requirements.

7.4 Babergh and Mid Suffolk are predominantly rural Districts, characterised by a small number of Market Towns, 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.

7.5 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.

7.6 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 the long-term impacts of the COVID-19 pandemic.

7.7 It is within this context that Babergh and Mid Suffolk Councils have prepared the JLP as proposed to be modified. It identifies a need for over 18,000 new homes over the Plan period. 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.

7.8 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 the Part 1 Plan, with respect to environmental protection and enhancement, and infrastructure provision, which performed very positively in the SA, and which the SA helped to inform and improve.

7.9 Overall the SA found that the JLP as proposed to be modified 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), 10 (Climate Change Adaptation), SA Objective 11 (Biodiversity and Geodiversity), SA Objective 13 (Landscape and Townscape), SA Objective 14 (Economy), SA Objective 15 (Town Centres) and SA Objective 16 (Sustainable Travel). In some instances, the SA recognises that the JLP as proposed to be modified may have some negative effects too in relation to 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, that could be used to mitigate such effects. Such issues will be considered further in the SA of the forthcoming Part 2 JLP.

7.10 In summary, therefore, the JLP seeks to accommodate a substantial increase in development, which 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, which will require careful planning, management and monitoring.

Next steps

7.11 This Main Modifications SA Report will be published on the Council's website for consultation during the advertised period.

LUC

February 2023

Appendix A

Consultation Comments

Table A.1: Consultation comments received on the SA Scoping Report (consulted on in April 2019)

Respondent	Representation	Response
Environmental Agency	We recommend that the following is added in the section of the table titled “National Plans and Programmes”: ■ “Guidance on insurance and planning in Flood Risk Areas for Local Planning Authorities in England: Association of British Insurers/National Flood Forum”, 2013 ■ Environment Act, 1995 ■ “Adapting to Climate Change: A guide for local councils” – DEFRA 2010 ■ “UKCP18 Science Overview: Executive Summary” – Met Office, January 2019 ■ “The National Flood and Coastal Erosion Management Strategy for England” – DEFRA/Environment Agency, October 2017 ■ “Natural Flood Management – Working with Natural Processes” – DEFRA/Environment Agency, October 2017 ■ “Anglian river basin District: Flood Risk Management Plan 2015-21” – Parts A to C, SEA and Habitats Regs Assessment (Environment Agency 2016) ■ “Suffolk Local Flood Risk Management Strategy”, 2012 ■ “Essex and South Suffolk Shoreline Management Plan” – Environment Agency, 2010 ■ “East Suffolk Catchment Flood Management Plan” – Environment Agency, 2009 ■ Great Ouse Catchment Flood Management Plan” – Environment Agency, 2011 ■ North Essex Catchment Flood Management Plan – Environment Agency, 2009 ■ “Broadland Rivers Catchment Flood Management Plan” – Environment Agency, 2009 ■ “Sudbury and Great Cornard Surface Water Management Plan” – Suffolk County Council/BMT Ltd, February 2019 ■ “Babergh District Council Level 1 and Level 2 Strategic Flood Risk Assessment”, 2009 ■ Mid Suffolk District Council Level 1 Strategic Flood Risk Assessment, 2008 ■ Babergh District Council Water Cycle Study, 2011 ■ Suffolk County Council Preliminary Flood Risk Assessment (2011) and update (2017) ■ “Adapting to climate change: A guide for local councils” – DEFRA, 2010	Place Services’ response These Plans and Programmes will be added to the relevant contextual review section of the SA. LUC’s response Reference to the listed documents has been made where they are considered relevant in the section ‘Climate Change Adaptation and Mitigation’ in Appendix B (Policy Review and Baseline Information) of this SA Report.

Respondent	Representation	Response
	■ “UKCP18 Science Overview: Executive Summary” – Met Office, January 2019 ■ “The National Flood & Coastal Erosion Risk Management Strategy for England” – DEFRA/Environment Agency, September 2011	
	3.3.7 – Biodiversity We would recommend that this section is enhanced as it is not fully effective in the current environmental and climate emergency. This section should make reference to the need within Babergh and Mid Suffolk for a network of high quality habitats in the wider countryside supporting populations of birds, native mammals, invertebrates and plants and that these habitats are vital in their own right and for the ecosystem services they provide for the Districts. The range of ecosystem services nature provides should be specifically outlined. Reference also should be made to ensure existing and new habitats are connected to enable wildlife to move through the Districts and is able to adapt to the changing climate. Reference needs to be made to all designated sites and the wider countryside being enhanced by any development proposals (and that any damage to existing sites is not acceptable) as part of the requirement to ensure development delivers a net gain in biodiversity.	Place Services’ response The SA at the Regulation 18 stage will focus on making suitable recommendations regarding high quality habitats where relevant. LUC’s response The section ‘Biodiversity’ in Appendix B (Policy Review and Baseline Information) of this SA Report looks at biodiversity within the BMSDC area and identifies the need within both Districts for a network of high-quality habitats. Specific reference is made to designated biodiversity assets within both Districts. Information on climate change is provided in the section ‘Climate Change Adaptation and Mitigation. Biodiversity net gain is addressed in the JLP.
	3.3.8 – Landscapes This section should be enhanced by specifically making reference to the requirement to protect, enhance, and restore both protected and non-designated landscapes. Landscapes in Babergh and Mid Suffolk have suffered significant damage in the last 70 years as a result of agricultural intensification and the resultant simplification of the farmed landscape. This has been through the effective loss of mixed farming systems and increases in field sizes with associated loss of hedgerows, woodland and farm ponds. Reference needs to be made to the crucial role development can play in enhancing and restoring landscapes both within and outside protected landscapes.	Place Services’ response The SA at the Regulation 18 stage will focus on making suitable recommendations regarding the crucial role development can play in enhancing and restoring landscapes both within and outside protected landscapes habitats where relevant. LUC’s response The protection, enhancement and restoration of both protected and non-designated landscapes is addressed in the SA.
	3.3.9 - Water Environment More detail should be provided in this section. Specific reference should be made to the water resource issues that apply to Babergh and Mid Suffolk in terms of current and future water availability and how vital water efficiency measures will be in any new housing and industrial development as the population grows and our climate continues to change. Water efficiency should be encouraged in existing homes and businesses. In regards to the Water Framework Directive (WFD), it should be made clear that all public bodies are responsible for delivering the objectives of WFD. The text found in the Technical Appendix of this letter may prove useful in strengthening and clarifying this section of the	Place Services’ response Additional baseline information will be added to the relevant Annex within the SA. LUC’s response The section ‘Land and Water Resources’ in Appendix B (Policy Review and Baseline Information) of this SA Report looks at water resource issues that apply to the JLP area. Reference is made to the European Water Framework Directive (2000) under the ‘Policy context’ section.

Respondent	Representation	Response
	Sustainability Appraisal. We would suggest that the objectives for WFD on page 45 of the Sustainability Appraisal are moved up to this section as this is when WFD is first mentioned. As always, scoping reports should also contain more local information on WFD. An overview of WFD waterbodies and RBMP2 WFD current status would be beneficial in this section. This section should also reference protected sites within the water environment such as sections of the Stour and Orwell Estuaries which is a SSSI and SPA under the Habitats Directive. The scoping report should reference the habitats directive, outline the protected features of the sites and their associated objectives which are more stringent than those for WFD. In addition, the table on page 53 in the “water” section, 2nd box, the Habitats directive should be referenced against the paragraph discussing Natural England and protected areas. In the segment on page 5, in section 3.2 “Policies, Plans and Programmes (Stage B1)”, The Habitats Directive needs to be listed among the other policies and plans highlighted. This section also references Alton Reservoir, but this needs to be expanded upon as large sections of both of these Districts are covered by Drinking Water protected areas and Safeguard Zones. The Scoping report should highlight the existence of these protected sites and the need to safeguard these areas (particularly from diffuse runoff – pesticides) in order to protect the quality of public drinking water supply.	The section ‘Biodiversity’ in Appendix B (Policy Review and Baseline Information) of this SA Report looks at both estuaries in the BMSDC area, in addition to SSSIs and SPAs. Reference is made to the European Habitats Directive (1992).
	Table 25: The SA Objectives Objective 9 “to reduce contribution to climate change” in the SA Objectives table on page 54 has this ticked as an ‘Environmental’ and ‘Social’ issue only. We would suggest that the ‘Economic’ box is also ticked. The social and economic costs of not reducing climate change impact and being prepared to adapt to it are likely to be much higher than responsible early reduction in contribution/effects. This is likewise the case for objective 10 in the same table. Objective 11 “To conserve and enhance biodiversity and geodiversity” has a direct impact on social effects and wellbeing. It is difficult to separate out which environmental impacts will not have social and economic impacts. For this reason, it may be beneficial to have included a statement acknowledging these are integrated and inseparable and in turn that care for a high quality environment is part of a holistic approach to ensuring a sustainable future for social and economic growth.	Place Services’ response These amendments have been made in the SA. LUC’s response This comment was not relevant to LUC’s SA Scoping Report.
	3.3.10 – Climate and Energy We welcome the addition of the first bullet point in this section. However, as referenced in our response above, this would be better placed in section 3.3.9 (Water Environment). This also applies to the paragraphs referring to water companies, water supply and drought plans as well the main river map.	Place Services’ response These amendments have been made in the SA. LUC’s response This comment was not relevant to LUC’s SA Scoping Report.

Respondent	Representation	Response
	Table 27: SA Framework for Assessing the Plan We are pleased to see on page 58 in section 6 that the objective has been amended to include water quality as well as water resources. The only improvement that should be made to enhance this would be to include a proposed guide question of “will it protect and enhance protected sites under the habitats directive”?	Place Services’ response This question, and the notion of water related impacts, is covered within the Biodiversity objective. The Plan’s HRA / AA also informs the SA. LUC’s response We will continue to use this SA Objective that looks at both water quality and water resources. The guide question has not been amended due to the fact a different SA Objective, SA Objective 11, addresses biodiversity.
	3.4.1: The Compatibility of the SA Objectives The health/open space paragraph on page 56 should be refined as recreation can take many forms and some forms may be incompatible with some biodiversity but there can be overlap. It is unlikely that any land is ‘purely for landscape use’ as most land is multifunctional (for example footpaths on flood storage reservoirs/local wildlife sites/ farmland). Recreation that might damage biodiversity should clearly be sited away from sensitive sites. Government policy on Biodiversity since Sir John Lawton’s ‘Making Space for Nature’ (2010) report is that an integrated network of bigger, better and more joined up wildlife sites is needed for a sustainable future for Britain’s biodiversity. The Sustainability Appraisal could be enhanced by referencing the aspiration for this approach to achieve a sustainable future for biodiversity in the light of habitat fragmentation and climate change. Current research suggests that the current protection of Local Wildlife Sites and Local Nature Reserves is not working effectively and that Sustainability Appraisals could go further. Essentially, habitat creation and enhancement is needed to create this network and it is important that provision is included for this.	Place Services’ response These amendments have been made in the SA. LUC’s response The section ‘Population, Health and Wellbeing’ in Appendix B (Policy Review and Baseline Information) of this SA Report provides a summary of the results of BMSDC’s Open Space Assessment (2019). The protection of Local Wildlife Sites and Local Nature Reserves is addressed in the SA
	3.5.3 – The SA Framework for Assessing Site Options On page 66 in section 5 there is reference to conserving and enhancing water quality and resources as well as reference to source protection zones. This assessment should also look at the proximity to Surface Water Safeguard Zones as well as Source Protection Zones for groundwater. In addition, we would also advise including a site criteria for proximity to protected areas/conservation sites.	Place Services’ response These issues have been explored in the SA of site options. LUC’s response The section ‘Land and Water Resources’ in Appendix B (Policy Review and Baseline Information) of this SA Report makes reference to Water Safeguard Zones and Source Protection Zones. Water Safeguard Zones cover the majority of Babergh and Mid Suffolk Districts. Therefore, in order to identify particular locations where there is a significant risk to drinking water, proximity to Source Protection Zones only have been used in the site assessment criteria, as these are more locationally specific.

Respondent	Representation	Response
Historic England	We welcome the list of Policies, Plans and Programmes on pp5-18 of the report. We also suggest you include the following: ■ The Convention for the Protection of the Architectural Heritage of Europe ■ Ancient Monuments & Archaeological Areas Act 1979 ■ Government's statement on the Historic Environment ■ Suffolk Minerals Plan ■ Historic Environment Record ■ AONB Management Plans ■ Conservation Area Character Appraisals and Management Plans ■ Listed building Heritage Partnership Agreements	Place Services' response These Plans and Programmes will be added to the relevant contextual review section of the SA. LUC's response Reference has been added to the listed documents where relevant in the section 'Historic Environment' in Appendix B (Policy Review and Baseline Information) of this SA Report. Reference to the Suffolk Minerals & Waste Local Plan is provided in the section 'Land and Water Resources' under the 'Policy context' section, whilst reference to the AONB Management Plans is provided under the 'Policy context' section in the section 'Landscape'.
	The historic environment is considered the most appropriate term to use as a topic heading as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage. Modern convention and consistent with the NPPF is to refer to scheduled monuments rather than scheduled ancient monuments, given that a wide range and age of monuments are scheduled (eg p21) Similarly we suggest the use of the term Registered Park and Garden, again consistent with the NPPF. See p21 of the Scoping report).	Place Services' response These amendments have been made in the SA. LUC's response The suggested terms have been used in this SA Report.
	All designated heritage assets (Conservation Areas, Listed Buildings, Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields, and Protected Wrecks) within the area should be identified. Mapping these assets provides a greater indication of their distribution and highlights sensitive areas. However the maps on p 43 are of such a scale that it is difficult to interpret. We suggest that these maps should be produced at A4 for greater clarity. We also would expect non-designated heritage assets to be identified. These include, but are not confined to, locally listed buildings. In addition to the above, we would expect reference to currently unknown heritage assets, particularly sites of historic and archaeological interest. The unidentified heritage assets of the District should be acknowledged and outlined in this section. Identification and mapping of designated and non-designated heritage assets at risk can provide an indication of clusters and themes.	Place Services' response These amendments have been made in the SA. LUC's response Please see Figures B.18 and B.19 in Appendix B (Policy Review and Baseline Information) of this SA Report which display where the designated heritage assets are within the BMSDC area. Both designated and non-designated heritage assets have been taken into account in the SA and through the Heritage Impact Assessment undertaken by LUC.

Respondent	Representation	Response
	Historic England's Good Practice Advice Note 1 contains advice on other relevant sources of evidence. These include Conservation Area Appraisals and Management Plans, Local Lists, Historic Characterisation assessments and any other in-house and local knowledge. We recommend that these other sources of evidence are considered as part of the SA process.	
	We broadly welcome the issues identified in the report. We would also suggest that other Key Sustainability Issues for the Historic Environment should include: - Conserving and enhancing designated and non-designated heritage assets and the contribution made by their settings - Heritage assets at risk from neglect, decay, or development pressures; - Areas where there is likely to be further significant loss or erosion of landscape/seascape/townscape character or quality, or where development has had or is likely to have significant impact (direct and or indirect) upon the historic environment and/or people's enjoyment of it - Traffic congestion, air quality, noise pollution and other problems affecting the historic environment	Place Services' response These considerations have been explored in the SA in the assessment of Policy, sites and reasonable alternatives where relevant. LUC's response Noted. Where site specific opportunities arise relating to potential development locations, these are identified in the Heritage Impact Assessment.
	We would expect to see consideration of opportunities. It is considered that the historic environment can make a significant contribution to the success of development and there may be opportunities for the enhancement of the historic environment which comes from sustainable development proposals. It is considered that the Sustainability Appraisal should highlight these opportunities.	Place Services' response At this current stage, the impacts on the Historic Environment highlighted within the SA are necessarily precautionary and recommendations exist within the Plan to ensure further evidence is gathered at the planning application and Plan level. LUC's response The SA has drawn on the Heritage Impact Assessment undertaken by LUC.
	The historic environment should be a factor when considering a method for the generation of alternative proposals. The impact of proposals on the significance of heritage assets should be taken into consideration at an early stage. In terms of sites, this should be based on more than just measuring the proximity of a potential allocation to heritage assets. Impacts on significance are not just based on distance or visual impacts, and assessment requires a careful judgment based on site visits and the available evidence base.	Place Services' response At this current stage, the impacts on the Historic Environment highlighted within the SA are necessarily precautionary and recommendations exist within the Plan to ensure further evidence is gathered at the planning application and Plan level. LUC's response The SA has drawn on the Heritage Impact Assessment undertaken by LUC.
	In preparation of the forthcoming Sustainability Appraisal, we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups.	Place Services' response

Respondent	Representation	Response
		Input has been included from Place Services historic environment specialists in the identification of effects and recommendations. LUC's response The SA has drawn on the Heritage Impact Assessment undertaken by LUC, which has looked at a range of information sources.

Table A.2: Consultation comments received on the Preferred Options SA (consulted on between July and September 2019)

Representation ID	Respondent	Representation	LUC's Response
16235	David Howorth	LP10 doesn't seem to meet the requirements. 'Plans for the needs of those wishing to build their own homes' would seem to require the council to allocate some land for the purpose. Instead, the Council is setting up a register, which does to achieve anything towards the goal, it simply serves as a record of unmet demand. With regard to LP23, this should be more specific about requirements for reducing new developments dependence on fossil fuels, such as having no gas or oil burners and energy must be renewable. There is a serious deficiency in proposed policy LP23 because it appears to be based on the policies expressed in the Green Building Council Policy Playbook. However, it is missing a vital part of that rule. With regard to LP25, the period of three months seems to be unreasonably short. Therefore, some renewable energy schemes may experience longer gaps and the three-month period should be extended. The description of Building Regulation in the glossary is incorrect. The SA is too optimistic in its assessments.	LUC was appointed in November 2019 to carry out the SA of the Babergh Mid Suffolk Joint Local Plan. All site options and policies have been re-appraised in this SA Report.
16239	Forestry Commission	Thank you for consulting the Forestry Commission. As a Non Ministerial Government Department, we provide no opinion supporting or objecting to a policy, an application or site allocation. Rather we provide information on the potential impact that a proposed development would have on ancient woodland. Having reviewed the Sustainability Appraisal Environmental Report, June 2019, I am happy to confirm that the Environmental Report complies with the	Noted.

Representation ID	Respondent	Representation	LUC's Response
		Government's 'Standing Advice' on the importance and protection of ancient woodland.	
17134	AONB Team	The SA does not reference either the Dedham Vale Area of Outstanding Natural Beauty (AONB) and Stour Valley Management Plan 2016 -2021 or the Suffolk Coast & Heaths Area of Outstanding Natural Beauty Management Plan 2018-2023. Under the landscape/townscape SA Framework objective there is no criteria to assess impacts on the Dedham Vale or the Suffolk Coast & Heaths AONBs It is not clear how the impacts on the nationally designated landscapes or their settings have been assessed even at a high level to support residential allocations in or with their setting.	Noted.
17348	Mr Alan Walmsley	This report is obviously a desk exercise, based on a formulaic approach governed by legislative guidance. As such, it is a tick box exercise which is completely pointless and merely signs off the JLP without examining it in any depth. It is very obvious that the plans have major issues within them, not the least being that some of the policies conflict with each other. Others are not policies at all, but re-statements of the obvious. Other policies display a complete lack of understanding of the major industries of the area.	LUC was appointed in November 2019 to carry out the SA of the Babergh Mid Suffolk Joint Local Plan. LUC has built on and developed the earlier SA work in this stage of the JLP preparation process.
17526	Amber REI Holdings Ltd	SP01 "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". The current JLP minimum housing requirements does not accord with the standard method and therefore should be revised. SP02 In its current form, the policy does not allow for variation in provision in line with requirements set out within neighbourhood plans, nor was this option tested as an alternative. This option should be tested through the SA and subsequently included within the JLP Policy, in order to meet objective 4 of the SA SP03 Settlement hierarchy does not include provision for previously development land to come forward for development outside of settlement boundaries. This is inconsistent with the SA's statement that PDL in the first instance is a common	SP01 BMSDC are of the view that the housing requirement is correctly calculated and that there are no reasonable alternatives that need to be subject to SA. SP02 Policy SP02 is a strategic policy and BMSDC are of the view that the reasonable alternatives to this strategic policy approach have been adequately considered for the purposes of SA. SP03 The primary purpose of Policy SP03 is to define a settlement hierarchy. Brownfield land has been taken into account in defining settlement boundaries. Policy SP03 states that outside of the defined boundaries in isolated locations development will only be permitted in exceptional circumstances. The role of the SA is to promote sustainable development by assessing the extent to which the emerging Plan, when judged against reasonable alternatives, will help to achieve

Representation ID	Respondent	Representation	LUC's Response
		theme throughout the plan's environmental policies. This should be reflected in the strategic policies in order for it to be effective. PDL The SA states that "The development of previously developed land in the first instance is a common theme throughout the Plan's environmental policies." the current wording of certain policies are not sufficiently flexible to allow for the redevelopment of PDL outside of designated settlement boundaries. It is therefore clear that the Plan as currently drafted fails to achieve 'PDL in the first instance' and should be amended in line with the suggestions in this Representation to achieve this. LP20 LP20 makes no reference to the setting of heritage assets as correctly identified in SA Objective 12. As suggested above, the policy should be amended to reflect this and to acknowledge that there are scenarios where existing development has a significant detrimental effect on a designated heritage asset and therefore alternative development proposals which improve this will be supported.	relevant environmental, economic and social objectives. PDL (i.e. brownfield land) is included in the Site Assessment Assumptions and Criteria. PDL The JLP recognises that the supply of brownfield land is limited in the JLP area. Where brownfield land has come forward through the SHELAA for consideration as site allocations, they have been subject to SA.. LP20 A Heritage Impact Assessment undertaken by LUC has informed the re-drafting of Policy LP20 (now numbered Policy LP21), as well as the SA process, and the choice of sites to be allocated in the JLP.
17799	Dr John Caesar	In Annex E, for example site ALT20 (p197) and other sites for Needham Market, there is an issue with a statement that "Needham Market has a good relationship to the wider transport network courtesy of the train station and A14". This is inaccurate, as there is limited clearance access under the railway, the road itself is not of a standard for high traffic volumes, and it floods frequently. It is also disappointing that site ALT20 has still been included as an alternative site since access through the flood zone has already been deemed unsuitable.	All policies and site options have been re-appraised in this SA Report.
17859	Stradbroke Parish Council	Stradbroke Parish Council responded to the SA and Local Plan with multiple objections. The Parish state that the SA and the policies are ineffective, with the main ineffective policies being: ■ Policy SP05 Employment Land; ■ Policy LP12 Safeguarding Economic Opportunities; ■ Policy LA099 Allocation: Land at Eye Airfield, Eye; and ■ Policies LA 080- LA 083 Stradbroke NP village allocations.	Noted. All policies and site options have been re-appraised in this SA Report.

Representation ID	Respondent	Representation	LUC's Response
		The Parish state that these policies fail to meet the requirements of, Schedule 1 and Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004 and do not assess the impacts of these Policies on different issues as required. Cranswick Poultry Production factory on Eye Airfield is not a major infrastructure development however, the Parish view the developments size as major and it meets the size requirements of Schedule 2 developments in the EIA Regulations. The Applicant requested a scoping opinion for the factory proposal, but this was not carried out. The proposal was granted planning permission despite there being no scoping opinion and an outstanding highways requirement. Reasonable alternatives were also not considered. According to the Parish, the impact of this development on other policies promoting population and human health have not been assessed. Furthermore, an "EIA Schedule 2" project scoping opinion was requested by the Applicant for the factory but not carried out between January and March 2017 for a development proposal later submitted as Planning application DC/17/05666. The Parish noted the Applicant requested a screening determination and MSDC determined it in favour of the Applicant on his own grounds despite an outstanding SCC Highways requirement for transport information. The Parish are also concerned about the social, environmental and economic impacts of the development, such as transport, waste and local supply chain effects. Transport modelling has not been completed and transport evidence bases have not been reference. The Parish state that the Local Plan is now glossing this development and the emerging policies will potentially disadvantage residence and businesses within the community, as they do not consider the offsite impacts of the factory. The Parish suggest that the potential regional impact on land values from the rise of localised large scale poultry farming have not been assessed. Applying a brown field uplift value to greenfield agricultural land value must be modelled. This is especially important where a sub-regional housing land value is created by scale housing policy allocations such as in Stradbroke. Finally, the Parish state that Stradbroke NP Village Allocations is a policy in itself and the whole policy should be assessed accordingly, not just the individual sites.	
17909	Mr and Mrs Kathy & Ray Barry	Information made available for the consultation is not only unprofessional but misleading, almost to the point of deceiving. The Sustainability report is 1700 pages politically correct "Cods Wallop" that does not even cover within the assessment matrix material issues which should be taken into consideration.	LUC was appointed in November 2019 to carry out the SA of the Babergh Mid Suffolk Joint Local Plan. LUC has been tasked with building on and developing existing SA work for the remaining stages of the JLP preparation process. In the SA Scoping Report, LUC suggested some amendments to the existing SA criteria.

Representation ID	Respondent	Representation	LUC's Response
		The Sustainability matrix does not take into account two very material and important issues when looking at potential sites. The SA report only takes into consideration potential flooding on proposed site and not any risk created to others. Access to proposed sites is the potential difference between sustainable well being for existing residents or a living hell as a result of traffic congestion and the consequent environment impact. The plan suggests the old SHELAA site SS020 is included within the proposal but on an alternative basis as site ALT14, I am at a loss to establish this from the published documents. Inclusion of this site is absolutely bonkers. The Sudbury and Great Cornard Surface Water Management Plan your consultants had access to, make it abundantly clear this site is within the CRITICAL DRAINAGE AREA. Food risk to the area would not only require full betterment but also huge engineering works to ensure no deviation of flood flow path. The preferred site LA042 or old SHELAA site SS0242 is now proposed to accommodate 500 new properties. No one at the LPA has taken on board what BMT are telling you!	SA Objective 10 looks into reducing vulnerability to extreme weather events and flooding as a result of climate change, in addition to increasing resilience to these extreme weather events. SA Objective 16 seeks to encourage sustainable methods of travel and gives consideration to congestion. All site options have been re-appraised in this SA Report.
17999	JB Planning Associates (Mr and Mrs Britnell)	SA Objectives 3.1 and 3.2 It is highly questionable whether the proposed allocation is within 1km of a main employment area. The ports of Felixstowe and Harwich may be within a 1km radius of the site but access by road is considerably further by road via the B1456 to join the national highway which is heavily congested at peak times. Local employment opportunities are limited and accordingly the SA should record the impacts as 'uncertain/unknown' rather than 'positive'. SA Objective 12.1 Our clients do not consider the SA adequately considers the harm that would be caused to the significance of a designated heritage asset and its setting. This should be reflected in the scoring and the impacts adjusted from 'uncertain' to 'negative'. Our clients would also point out that due its age, their property has shallow foundations and the construction activities associated with any new development in the immediate vicinity could lead to vibration issues. There are correspondingly	SA Objectives 3.1 and 3.2 LUC was appointed in November 2019 to carry out the SA of the Babergh Mid Suffolk Joint Local Plan. LUC has been tasked with building on and developing existing SA work for the remaining stages of the JLP preparation process. All site options have been re-appraised in this SA Report using the Site Assessment Criteria and Assumptions in Appendix B of the SA Scoping Report. SA Objective 12.1 LUC has undertaken a Heritage Impact Assessment for BMSDC, which has informed the site appraisals in this SA Report.

Representation ID	Respondent	Representation	LUC's Response
		practical reasons why and new development should be located away from the farmhouse. SA Objective 13.1 In our clients opinion the status conferred to the AONB and the contribution that the adjoining countryside makes to its character and appreciation has not been adequately considered by the SA. They therefore disagree with the assessment findings. The landscape within the area would be sensitive to change and the effect of any development would be permanent, long-term, and have a 'negative' rather than a 'positive' impact. SA Objectives 16.1 and 16.2 The SA correctly records the impact of the proposed development as 'negative' (Objective 16.1) and reflects this point within the associated closing commentary for Site LA075. Our clients would however reiterate that Shotley Street is not a sustainable location for additional development other than a modest quantum that is commensurate with the size of the village and continue to have concerns in relation to the capacity of the B1456 to serve further housing given the commitments that exist at HMS Ganges.	SA Objective 13.1 All site options have been re-appraised in this SA Report. Further evidence on landscape sensitivity was carried out by LUC which was taken into account the potential effects on the AONBs.
			SA Objectives 16.1 and 16.2 All site options have been re-appraised in this SA Report.
18002	Environment Agency	Page 13 - wastewater In reference to the Waste Water Recycling comments on page 13 – new (2018) figures show both Stowmarket and Hadleigh are at around 91% of capacity, and development will need to be discussed with Anglian water to ensure wastewater treatment capacity will be available in a timely manner. Growth must be phased in line with water company provision of capacity and development must not be occupied until capacity is available. 'Water company upgrades/improvements' are not always needed to provide additional capacity; for example the company may be able to carry out management options, so this phrase could be changed to one more general to just say that 'ensuring growth is phased in line with water company provision of wastewater treatment capacity'.	This SA Report contains information on wastewater in the section 'Land Water Resources' in Appendix B (Policy Review and Baseline Information) of this SA Report. Pressure on wastewater treatment facilities is identified as a key sustainability issue in this report. The SA has been informed by the findings of the Water Cycle Study.
18003	Environment Agency	Page 13 – climate change and energy section This climate change and energy section references drought. The plan area is considered one of the driest regions in the UK and based on climate change predictions and Anglian Water's forecasting there is an increased likelihood of drought and increased stress on current and future water supplies. There should therefore be more emphasis on water efficiency, impacts that increased likelihood of drought will have on WFD objectives and the area's protected sites.	The section 'Land and Water Resources' in Appendix B (Policy Review and Baseline Information) of this SA Report outlines the likelihood of drought and stress on water supply. The SA has been informed by the findings of the Water Cycle Study.

Representation ID	Respondent	Representation	LUC's Response
18006	Environment Agency	Paragraph 5.5.2 acknowledges water efficiency and reduction in water consumption during the operational phase of building. This could be further enhanced by acknowledging the need during the construction phase too.	Noted. The role of the SA is to promote sustainable development by assessing the extent to which the emerging Plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. The pressure on water resources is recognised in this SA Report
18573	Pegasus Group (Endurance Estates)	These representations (in attachment) identify a number of discrepancies as to how draft Policy LA036 has been assessed. The Sustainability Appraisal should be updated in light of the matters raised in these representations.	LUC was appointed in November 2019 to carry out the SA of the Babergh Mid Suffolk Joint Local Plan. LUC has been tasked with building on and developing existing SA work for the remaining stages of the JLP preparation process. All policies and site options have been re-appraised in this SA Report.
18903	Stradbroke Parish Council	SA and policies are ineffective. They fail to meet the requirements of Schedule 1 and 2 of the Environmental Assessment of Plans and Programmes Regulations 2004 nor assess the impacts of these policies as required. HRA must be reassessed as LA099 is erroneously assessed. Ways to mitigate potentially adverse effects have not been considered.	LUC has been appointed to carry out the remaining SA work on the Babergh Mid Suffolk Joint Local Plan. All policies and site options have been re-appraised in this SA Report.
18961	Evolution Town Planning (Mr E. Baulby & Mr B. Baulby)	Support from the landowner for the allocation of site LA074. Rejection of claims in the Sustainability Appraisal that the development will harm the landscape and will be constrained by flood risk.	All site options have been re-appraised in this SA Report and have been informed by a landscape sensitivity study and Strategic Flood Risk Assessment.
19034	Strutt & Parker (M Scott Properties Ltd)	There are elements within the Sustainability Appraisal (SA) which do not accurately reflect Site LA055 and have consequently led to an inaccurate assessment.	All site options have been re-appraised in this SA Report on a consistent basis using the same criteria and assumptions set out in Appendix C (Assumptions Applied for the Sustainability Appraisal of Site Options) .
19241	Babergh Green Party	We note that on p. 64, Table 28, Sustainability Assessment Framework for Assessing the Plan's Site Options shows that 'Reducing contribution to Climate Change' is now the revised Objective #9. In view of comments made throughout these representations, we recommend that this is restyled as Objective #1. We also found this document, written as it is in a very small point size, difficult to read and absorb and respectfully request that the final Sustainability Appraisal is produced in a more easily readable format.	The Sustainability Appraisal Framework for assessing the site options has been agreed and consulted on and will remain as it is. Refinements to the SA Site Assessment Criteria and Assumptions have been made to inform this SA Report.

Representation ID	Respondent	Representation	LUC's Response
19280	Hopkins Homes Ltd and Hopkins and Moore (Developments) Ltd (the 'Hopkins Group')	SA assessment of LA095 - While we support the Sustainability Appraisal's assessment of the site, the full representation addresses those elements which received either a '-' or '?' rating in terms of their sustainability impact. In summary, we support the conclusions within the Sustainability Appraisal regarding the site, and trust the above consideration of elements which received a '-' or '?' in terms of their Sustainability Impact in the SA can be updated in light of this additional points of clarification, and will inform the drafting of more detailed policy wording at the Regulation 19 stage, if required.	LUC was appointed in November 2019 to carry out the SA of the Babergh Mid Suffolk Joint Local Plan. LUC has been tasked with building on and developing existing SA work for the remaining stages of the JLP preparation process. All site options have been re-appraised in this SA Report on a consistent basis using the same criteria and assumptions set out in Appendix C (Assumptions Applied for the Sustainability Appraisal of Site Options) .
19358	Strutt & Parker (Hopkins Homes Ltd and Hopkins and Moore (Developments) Ltd (the 'Hopkins Group'))	The SA assessment of Site ALT13 is erroneous and does not justify rejection of the site for residential development. Indeed our detailed representations (see separate report), conclude that Site ALT13 is a more sustainable option for a residential site allocation, and one that would follow the pattern of the settlement in the Gipping Valley and result in significantly less visual impact and adverse affects on the character of the landscape, when compared to the proposed site allocation – Site LA012. We therefore strongly recommend the inclusion of the land east of Bramford Road, Sproughton (Site ALT13) as an allocation for residential development of up to 50 dwellings – either in addition to the existing proposed allocation Site LA012, or instead of this allocation.	LUC was appointed in November 2019 to carry out the SA of the Babergh Mid Suffolk Joint Local Plan. LUC has been tasked with building on and developing existing SA work for the remaining stages of the JLP preparation process. All site options have been re-appraised in this SA Report. This has been informed by a landscape sensitivity study undertaken by LUC.
19619	Pegasus Group (Endurance Estates)	The Sustainability Appraisal document is significantly flawed. Fundamentally, the site assessment is incomplete	LUC was appointed in November 2019 to carry out the SA of the Babergh Mid Suffolk Joint Local Plan. LUC has been tasked with building on and developing existing SA work for the remaining stages of the JLP preparation process. All site options have been re-appraised in this SA Report.

Table A.3: Consultation comments received on the SA Addendum (consulted on between August and September 2019)

Representation ID	Respondent	Representation	LUC's Response
17501	Mrs Mary Mugford	Housing development proposed at church field road. The roundabout by Mac Donald's becomes very congested already - traffic from Tesco and waldingfield roads. The 130 houses on the site of the orchard will add to this problem - already difficult at times getting out of driveway. This will make worse backlog of traffic from the ESSO roundabout to this one. Lorries on Church Field Road make vision difficult getting in/out of health centre it will certainly be worse. New development would encourage use of the health centre parking spaces for their use, which could prove catastrophic for HC users	Noted.
17705	Mr Roger Hayward	I endorse the draft plan for Chelmondiston and for the village to be categorized as Hinterland. This will safeguard the necessity for building developments on existing land designated as ANOB. Both Pin Mill and Lings Lane are to remain as Hamlets which will preserve their inimitable charm so important for tourism on the Peninsula.	Noted.
17795	Dr John Caesar	There is an issue with some of the statements regarding transport access to the A14 from Needham Market e.g. page 46, LA031, Question 16.1: "Needham Market has a good relationship to the wider transport network courtesy of the train station and A14". This is inaccurate, as there is limited clearance access under the railway, the road itself is not of a standard for high traffic volumes, and it floods frequently.	Noted.

Table A.4: Consultation comments received on the SA Scoping Report (consulted on between March and April 2020)

Respondent	Representation	Response
Environment Agency	We are pleased to see that the Water Framework Directive has been listed under Chapter 6 – Land and Water Resources. However, this small paragraph is all that appears to be included. Further text should be included further on in this section to expand upon the importance of meeting and improving upon the current quality status. We would want to see listed the main objectives for the District and the broad mitigating measures that are required to remedy issues. These can then link into all the various policies that are listed throughout the SA, such as those in Chapter 8 – Biodiversity. The management of water habitats links directly to wetland and terrestrial habitats and it is important this is made clear in the SA to instigate biodiversity networks rather than standalone habitats.	The importance and pressure on the water environments has been recognised in this SA Report.. Of most importance to the SA process is the effect on the water environment of the policies and proposals in the JLP and the reasonable alternatives. As a result, there are now four site assessment criteria relating to water resources and water quality (see SA Objective 5 in Appendix C (Assumptions Applied for the Sustainability Appraisal of Site Options) , and reliance has been placed on the Water Cycle Study to inform the judgements of the effects in the SA. The Water Cycle Study took into account the potential impact on internationally designated habitats.
	We note that the NPPF is mentioned which includes ecological networks, and on page 77 of the SA the pledge by Babergh District Council to protect wildlife, biodiversity and natural	Noted.

Respondent	Representation	Response
	habitats including producing a map showing wildlife networks; both are positive actions and can be enhanced by the inclusion of WFD.	
	There is a good understanding throughout the document of the importance of both local, national and international designated sites. Local sites, as is identified in table 8.1 on page 78, are key to maintaining a healthy ecological network and environment.	Noted.
	In SA objective 11, 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.	Noted. This is an issue that can be addressed at the development management stage in planning. However, it was brought to the attention of BMSDC for consideration. The JLP now includes references in the Local Plan as requested by the consultee.
	There is increasing pressure on the use of greenbelt land. There should be reference in Chapter 8 to the protection of green belt land as laid out in the NPPF.	There is no Green Belt land in Babergh or Mid Suffolk, therefore this comment is not relevant to this Local Plan.
	Given the water resource situation and the number of waterbodies at does not support good (DNSG) status for Hydrology and groundwater (especially North Essex Chalk) in deficit for water resources, there is an opportunity to improve on this topic within the document. There is no mention of Water Resources East, which it should do – a lot of councils are involved in this and should be working together to find sustainable solutions. There is no mention of catchment based solutions to improve the water resources stores within a catchment, e.g. working with flood risk teams to use Natural Flood Management and create stores of water in the catchment. Water efficiency to help reduce the per capita consumption of water also doesn't get a mention – there is a national target to reduce water use, but no mention in the SA. Water companies have both Water Resource Management Plans and drought plans in the public domain, but there was no reference to that either.	Reference to Water Resources East has been added to the policy context section on 'Land and Water Resources' in Appendix B (Policy Review and Baseline Information) of this SA Report, plus Water Resource Management Plans and Drought Plans. Further information has been added regarding catchment based solutions as requested.
Natural England	1. Whether there are any additional plans, policies or programmes that are relevant to the SA that should be included. Natural England has not reviewed the plans listed. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area; ■ Green infrastructure strategies ■ Biodiversity plans ■ Rights of Way Improvement Plans ■ Shoreline management plans ■ Coastal access plans	The list of plans provided has been reviewed and, where relevant, added to the policy context sections in Appendix B (Policy Review and Baseline Information) .

Respondent	Representation	Response
	■ River basin management plans ■ AONB and National Park management plans. ■ Relevant landscape plans and strategies.	
	2. Whether the baseline information provided is robust and comprehensive and provides a suitable baseline for the SA of the JLP. Sources of local plan evidence on the natural environment: <i>General natural environmental evidence</i> ■ National Character Areas ■ Natural capital maps ■ Magic map website ■ Local environmental record centres ■ Nature Improvement Areas <i>Landscape</i> ■ Magic website (for National Parks and AONBs) ■ National Parks/AONB Management Plans ■ Landscape Character Assessments ■ Data on tranquillity held by CPRE <i>Biodiversity and geodiversity</i> ■ Magic map website (for Ancient Woodlands, Local Nature Reserves, Priority Habitat Inventory, SSSIs including their impact risk zones, Special Areas of Conservation, Special Protection Areas and Ramsar Sites) ■ Local Biodiversity Action Plans ■ Protected Species <i>Access</i> ■ Magic map website (for National Trails, Public Rights of Way) <i>Soils</i> ■ Magic map website (Agricultural Land Classification)	Noted. The SA has drawn on a wide range of sources of baseline evidence that are sufficient to identify the key sustainability issues of relevance to the SA of the JLP. These include some of the sources listed. LUC holds national datasets on GIS so use of Magic is not required.

Respondent	Representation	Response
	<i>Climate Change</i> ■ Climate Change Adaptation Manual ■ National Biodiversity Climate Change Vulnerability Assessment Model ■ LWEC Climate Change Impacts Report Cards <i>Coastal and Marine</i> ■ Catchment flood management plans ■ Shoreline management plans ■ Any estuary or harbour management plans held locally ■ River basin management plans ■ Coastal erosion maps ■ Marine Planning evidence base ■ Heritage Coast	
	3. Whether there are any additional key sustainability issues relevant to the plan area that should be included. Natural England's interest areas (biodiversity, landscape, soils, and access to nature) appear to have been adequately covered given the plan area and scope.	Noted.
	4. Whether the SA framework (Chapter 11) is appropriate and includes a suitable set of SA Objectives. We note that SA Objective 1 addresses the health and wellbeing of the population. There are questions relating to enhancing provision of access, but none relating to impacts on existing recreational assets (quality and or extent). We suggest incorporating wording consider whether the proposal will avoid impacts on the quality and extent of existing recreational assets, such as formal or informal footpaths.	Appendix B (Policy Review and Baseline Information) of this SA Report, Site assessment criterion 1c includes assessment of access to and potential loss of Public Rights of Way (PRoW).
	SA Objective 11. To conserve and enhance biodiversity and geodiversity does not address impacts on ecological connectivity: There is a risk that in some situations, development on land of limited biodiversity value in its own right can lead to the creation of islands of biodiversity, permanently severed from other areas. We thus suggest adding "Will it ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced?"	The suggested wording of Natural England: 'Will it ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced?' ...has been added to the guide questions for SA Objective 11.

Respondent	Representation	Response
	5. Whether the criteria and assumptions for appraising potential site allocations (Appendix B) are appropriate for this stage of the SA process, and a suitable refinement on those used to date. Natural England suggest that the Accessible Natural Green Space Standards (ANGSt) Quantity Standards should be considered for potential site allocations where appropriate.	The Accessible Natural Greenspace Standard (ANGSt), prepared by Natural England, recommends that everyone, wherever they live, should have accessible natural greenspace: ■ Of at least two hectares in size, no more than 300 metres (five minutes' walk) from home. ■ At least one accessible 20 hectare site within two kilometres of home. ■ One accessible 100 hectare site within five kilometres of home. ■ One accessible 500 hectare site within ten kilometres of home. ■ A minimum of one hectare of statutory Local Nature Reserves per thousand population. Use of the ANGSt standards depends upon there being available the relevant data sources. Discussions with BMSDC indicate that a comprehensive, reliable data set in ANGSt format is not available in a form suitable for SA, but there are various recreational assets, both formal and informal, from the Open Space Study (May 2019) that are mapped using GIS that can be used in the SA. The distance criterion for access to open space has been reduced from 400m to 300m in order to receive a major positive score for site assessment criterion 1b.
	6. Whether the overall spatial strategy options (Chapter 12) represent a suitable and reasonable set of alternatives, and that no other clearly distinguishable spatial strategy options should be added. No comment.	Noted.
Anglian Water	Anglian Water's Water Resource Management Plan 2019 which has been approved by Defra should be referred to in the SA Scoping Report and the SA report. Please note that Anglian Water supplies water to part of the Local Plan area only as such the views of Essex and Suffolk Water should also be sought. Similarly reference should be made to Anglian Water's Water Recycling Long Term Plan (September 2018) which sets out a long term strategy for our water recycling infrastructure to 2045. Both of these documents are in the process of being reviewed as part of the WRMP 2024, the regional plan for water resources (led by Water Resources East) and the Drainage and Wastewater Management Plan.	Reference to these two documents has been added to the policy context section for 'Land and Water Resources' in Appendix B (Policy Review and Baseline Information) of this SA Report.
	The baseline for water refers to Babergh Water Cycle Study published in 2011. There is more recent information produced in relation to the available capacity within existing water recycling centres (formerly wastewater treatment works) i.e. Water Recycling Long Term Plan. In	The baseline has updated to reflect the latest Water Cycle Study, undertaken in 2020.

Appendix A
Consultation Comments

Babergh Mid Suffolk Joint Local Plan: Main Modifications
February 2023

Respondent	Representation	Response
	addition Babergh and Mid Suffolk Councils have commissioned a new water cycle study to replace this document.	
	Anglian Water provided for Babergh etc. - Reference should be made to Water Resource Zone summaries document supporting Anglian Water's WRMP 2019 which sets out the supply/demand balance position for the area. Reference is made to water efficiency but not water re-use measures. A growing population and an increase in development will place pressure on wastewater treatment works (WwTWs) - as set above the second sentence is not the most up to date information which is available.	Reference to Anglian Water's Water Resources Management Plan has been added to the policy context and baseline sections for 'Land and Water Resources' as relevant. The baseline has updated to reflect the latest Water Cycle Study, undertaken in 2020.
	Reference is made to asking whether development sites support the provision of sufficient water supply and treatment infrastructure. Anglian Water as a water undertaker is responsible for the infrastructure necessary to source and treat water to a potable (clean) standard for our customers which is funded by customer bills. Developers would be expected to pay developer charges to connections to the water supply network. As such it is unclear how this question would be tested as part of the Sustainability Appraisal.	It is acknowledged that Anglian Water is responsible for ensuring that development is supplied with water, and that developers are expected to pay for connections to the water supply network. The purpose of highlighting this issue is to recognise that water resources in the East of England are under stress. Judgements of effects have been informed by the Water Cycle Study.
	SA objective 1d Noise/odour - the criteria relating to noise/odour does not set out how odour will be considered from existing uses including water recycling sites managed by Anglian Water. Reference should be made to a 400m threshold for water recycling centres (formerly wastewater treatment works) consistent with the Suffolk Minerals and Waste Local Plan together with any additional evidence provided by the site promoter in relation to any identified amenity impacts principally from odour.	A new site assessment criterion for SA Objective 1d has been added, which ascribes a negative effect to sites which overlap the 400m safeguarding zones for water recycling centres.
	SA objective 5 reference is made to the location of existing source protection zones only. New development proposals may present a pollution risk to existing resources dependant upon the location and form of development proposals. The use of water and any water efficiency/re-use measures as part of the development is not referenced as part of Appendix B.	The presence of Source Protection Zones is considered appropriate to determine whether development could have an adverse effect on water quality at the strategic level. However, additional criteria have been added to the site assessment criteria for SA Objective 5 to reflect wider water resources and water quality issues as investigated through the Water Cycle Study. The potential for water pollution can be addressed through development management policies, and through the consideration of planning applications.
	SA objective 10 reference is made to fluvial and surface water flooding but not sewer flooding which will form part of the SFRA.	BMSDC have commissioned a Strategic Flood Risk Assessment (SFRA), the findings of which are reported upon in this SA Report
	Anglian Water does not have any comments to make in respect of what constitutes a reasonable set of alternatives as this outside of our role as an infrastructure provider.	Noted.

Respondent	Representation	Response
Armstrong Rigg Planning on behalf of Hopkins Homes Limited and Hopkins & Moore (Developments) Limited (the 'Hopkins Group')	The Scoping Report asks consultees to consider “Whether the overall spatial strategy options represent a suitable and reasonable set of alternatives, and that no other clearly distinguishable spatial strategy options should be added.” To date, the two rounds of alternative spatial strategy options have been subject to SA. The Hopkins Group consider that neither of these two previous rounds represent the full range of spatial strategy options available. They therefore support the current report's approach that proposes to assess a more comprehensive list of options in order to draw out the sustainability pros and cons of focusing development in different ways across the two Districts. The Hopkins Group object to the list of options for the following reasons: (1) failure to consider focussing development at Hinterland Villages; and (2) failure to define which routes will be assessed as 'sustainable transport corridors'. 1. To ensure the opportunities and constraints to development in rural areas are fully assessed, the Hopkins Group recommend that Spatial Strategy Option 3 is amended as follows: "Focusing development at the Core <u>and Hinterland</u> Villages". This is due to the fact the list includes an option to focus development at each tier of the settlement hierarchy with the exception of the Hinterland Villages. This is a significant omission as the Council's evidence base on the proposed settlement hierarchy, contained in the Topic Paper: Settlement Hierarchy 2019, clearly demonstrates that the larger hinterland villages have similar levels of service provision to the smaller Core Villages and could appropriately take more growth to achieve a more balanced distribution that would support services and facilities in rural areas. In this respect, we would highlight the work done by the emerging Greater Norwich Local Plan that proposes to allocate growth to village clusters based on primary school catchments. 2. The Hopkins Group consider that all significant transport corridors (a good proxy for which would be A-Roads) in the JLP area should be assessed under this Spatial Strategy Option to ensure that the most sustainable routes for growth can be identified. The Hopkins Group supports the inclusion of Option 6 – Focusing development along sustainable transport corridors, but is concerned that the SA Scoping Report fails to define which transport corridors will be assessed under this option. There is a risk in this respect that the SA will only consider the A12 and A14 corridors (as was the case in the Regulation 18 JLP in July 2019) and ignore other significant transport corridors as potential options for sustainable growth. In addition to the A12 and A14, the JLP area is served by the following important transport routes: A1071/A134 (Sudbury – Hadleigh – Ipswich); A134 (Sudbury – Long Melford – Bury St Edmunds); and A140 (Ipswich – Norwich).	With respect to (1), BMSDC do not consider the addition of 'Hinterland Villages' to be appropriate for inclusion in 'Spatial strategy option 3: Focusing development at the Core Villages', as the service provision of Core Villages is greater than that provided by other rural settlements as evidenced by the Settlement Hierarchy Review. However, Spatial strategy option 4: Proportionate growth – all settlements increase in size in proportion to current population and Spatial strategy option 5: Hierarchical growth – distributing development according to the settlement hierarchy, considers the relative performance against all other spatial strategy options, and includes reference to all settlement types in Babergh Mid Suffolk With respect to (2), BMSDC has defined those transport corridors that have either the best existing or greatest potential for enhanced public transport as being The London – Cambridge and London – Norwich rail routes and the A12, A14 and (to a lesser extent) A140 roads.

Respondent	Representation	Response
	The Scoping Report asks consultees to consider “Whether the criteria and assumptions for appraising potential site allocations are appropriate for this stage of the SA process, and a suitable refinement on those used to date.” The report refers to errors having been identified in the previous SA of potential site allocations and commits to reappraise all potential site allocations in the next stage of the SA in accordance with the Site Assessment Criteria and Assumptions presented in Appendix B of the Scoping Report. The Hopkins Group welcome this honest admission of previous errors, but is concerned that these errors were not picked up ahead of the publication of the Regulation 18 JLP in July 2019. It is of paramount importance to the sustainability of the emerging Local Plan that these previous errors are resolved at this stage and that the new Site Assessment Criteria and Assumptions are appropriate and most of all clear and easy to follow so that errors in assessment are avoided. On behalf of the Hopkins Group, we have reviewed the proposed Site Assessment Criteria and Assumptions at Appendix B of the Scoping Report in detail and have several concerns that are set out below. In conducting this review, we have assessed each of the 8 sites promoted by Hopkins Homes for allocation in the emerging Local Plan against the proposed assessment criteria. These sites (comprising those identified in the table above at Bentley, Boxford, Bramford (Fitzgerald Road), Brantham, Hadleigh, Somersham, Sproughton and Woolpit) are spread across the two districts and are located in a range of settlement types including 2 in Ipswich Fringe settlements, 1 in a Market Town, 3 in Core Villages and 2 in Hinterland Villages. We therefore consider our review of the Site Assessment Criteria and Assumptions to be robust and request that the Councils and their consultants take account of our comments below to ensure a robust assessment process. - Many of the assessment criteria judge the sustainability of a site based on its distance from various facilities and services (e.g. schools, public transport, open space, etc...). The Hopkins Group support this type of assessment in principle, but it is critical that the thresholds chosen and the scores given for sites between each threshold fairly reflect the comparative sustainability of the sites being assessed. The proposed Site Assessment Criteria fail in this respect as they do not include a neutral scoring middle range of distances. For example, the criteria for assessing distance from a bus stop, provides the following scores: <200m = major positive (++); 201-400m = positive (+); 401-800m = negative (-); and >800m = major negative (--) This means that a site that is 400m away from a bus stop would score 1 point, whereas a site that is 401m away would score -1 point, leading to a 2 point gap between the two sites in the assessment despite a very small real world difference in their comparative	LUC has been tasked with building on and developing existing SA work for the remaining stages of the JLP preparation process. All site options have been re-appraised in this SA Report, using the updated site assessment criteria in Appendix C (Assumptions Applied for the Sustainability Appraisal of Site Options). With regard to walking distances, there are a number of pieces of research that give a variety of recommended guidance distances for walking. 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 are based on the Institute of Highways and Transportation (IHT) guidance, which divides distances depending upon location and purpose of the trip into three categories: 'desirable', 'acceptable', and 'preferred maximum'. LUC's assessment criteria are therefore also divided into three categories, which is why a fourth category of 'neutral', as suggested by the consultee, has not been used. The IHT category of 'acceptable' implies that anything above this is 'unacceptable' (i.e. worthy of a negative score) although the IHT also uses the category 'Preferred Maximum', and therefore we are of the view that a minor negative score is valid for distances that fall into this category. With respect to applying scoring, the consultee refers to a situation where a site that is 400m away from a bus stop would score 1 point, whereas a site that is 401m away would score -1 point, leading to a 2 point gap between the two sites in the assessment despite a very small real world difference in their comparative sustainability. If scoring were to be used, it would be possible and reasonable to score significant positive and negative scores '3' and minor scores '1', which would result in a 2 point gap between a significant and minor effect. This would also mean that the difference between a minor positive and minor negative (i.e. between +1 and -1) would also be a 2 point gap, thereby introducing consistency into the scoring system. Sites that fall just over the distance buffers (e.g. 401m from a bus stop) have been appraised in line with the assessment criteria, so as to ensure consistency across all appraisals. Thresholds have to be introduced at some point, and those that are included for the SA criteria are reasonable. The main purpose, though, is for the site assessment criteria to allow objective and consistent scoring of sites, and to enable comparisons between the performance of sites to be made. This is an approach adopted in numerous SAs and found to be sound in examination. Note: we have increased the distances to bus stops in light of evidence that the IHT guidelines may be too constrained (see response to Pigeon Investment Management below).

Respondent	Representation	Response
	sustainability. This is clearly not a fair assessment of the merits of each site and adds undue weight in the overall assessment to measures of distance compared to other assessment criteria where a site's score more fairly reflects real differences in sustainability. Recommendation: A more appropriate assessment would be to include a middle range that is given a neutral score of 0. To use bus stops as an example, a fairer assessment of comparative sustainability would be produced using the following ranges and scores: - <200m = major positive (++); - 201-400m = positive (+); - 401-600m = neutral (0); - 601-800m = negative (-); and - >800m = major negative (--).	
	Criteria 1d (Noise/odour): The Hopkins Group object to this criteria as it is far from clear how it would be assessed without undertaking a detailed noise survey of each proposed development site. This is surely beyond the scope of the SA and the criteria should be deleted to avoid decisions being made with insufficient evidence of local noise environments. Recommendation: Delete criteria unless a suitable evidence base of the noise environment for each site can be produced.	As set out in the criteria: ■ A minor negative effect will be given when a site is within an A-weighted equivalent continuous sound level exceeding 59.9dB (daytime). ■ A major negative effect will be given when a site is within an A-weighted equivalent continuous sound level exceeding 59.9dB (daytime) AND/OR is less than or equal to 250m from a safeguarded area of a waste management facility. This has been determined using online datasets available on Defra's website, which look into road and rail noise. Figure B.11 in Appendix B (Policy Review and Baseline Information) of this SA Report displays these datasets. It is recognised that localised conditions can alter the potential for noise disturbance, and that mitigation can also play a role. However, at the strategic scale, it is considered to be appropriate to distinguish between those sites that are in closer proximity to sources of noise than those that are not (in line with the precautionary principle).
	Criteria 3a (IMD): The Hopkins Group broadly support this criteria as a way of encouraging investment and the provision of housing (including affordable) in more deprived areas (subject to assessments of viability to ensure that allocated sites are deliverable). However, when conducting our own assessment of Hopkins Groups' sites based on this criteria, we came across an issue with respect to the small size of the Lower Layer Super Output Areas (LSOA) for which IMD data is published. These areas are used by the Office for National Statistics for small area statistics and have an average population of 1,500 people in each area. In practice this means that even comparatively small settlements are often split into more than one LSOA. Further, it is clear from the government's IMD mapping website that the most deprived LSOAs are often (e.g. those in Bramford, Sproughton, Hadleigh and Stowmarket) not in the most deliverable or appropriate locations for development (e.g. they are located wholly within the	As set out in the respondent's comment, the English Indices of Multiple Deprivation measure relative levels of deprivation in Lower-layer Super Output Areas (LSOAs). We have tested the suggestion of the consultee and came to the conclusion that it could result in skewed results. For example, a single LSOA for one parish that falls within the 20% most deprived category could result in the whole parish being placed in the 20% most deprived category, even though the LSOAs of all the other areas in the parish are amongst the least deprived. Therefore, residential sites close to the less deprived LSOAs would score well even though they would have little likelihood in addressing deprivation issues in another part of the parish.

Respondent	Representation	Response
	settlement boundary with few brownfield opportunities or they are located in a predominantly rural part of the parish that is largely remote from the settlement boundary). In such cases, opportunities for development on land elsewhere in the parish would deliver almost identical benefits in helping to alleviate deprivation and should be considered favourably. Recommendation: We recommend that the scoring criteria should be amended to assess sites based on being within the most deprived parishes (with each parish's score based on the most deprived LSOA within that parish).	As a result, we have decided to continue with the approach as set out in the Scoping Report, which is also consistent with SAs we have undertaken elsewhere where Local Plans have been found sound.
	Criteria 3b (Town, district, local or neighbourhood centres) and 15a (Town and district centres): Aside from the obvious criticism that these categories are largely the same (with one scoring a site based on distance to either a town, district, local or neighbourhood centre and the other based on distance to a town or district centre), the Hopkins Group are concerned that there does not appear to be a definition anywhere of what constitutes a district, local or neighbourhood centre. The Hopkins Group do not object to the principle of assessing the sustainability of sites based on proximity to a centre, but clarity is urgently needed regarding the definition and location of these centres so an accurate and objective assessment can take place. Recommendation: Publish a list and maps of the town, district, local and neighbourhood centres as soon as possible for consultation alongside a methodology for how the centres have been assessed and categorised.	As set out in the footnote against SA Objective 3 (3b), GIS data are not currently available for local and neighbourhood centres. Therefore, it is only possible to rely on defined town and district centres. The town and district centres are set out in the BMSDC Settlement Hierarchy and are as follows: ■ Town centres: – Sudbury – Hadleigh – Stowmarket ■ District centres: – Eye – Needham Market – Debenham¹ It should be noted that there are a number of other site assessment criteria that are based on walking distances to services and facilities. 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 has therefore been used to populate scores for criterion 3b.
	Criteria 3c (Centres of employment): The Hopkins Group object to this criteria due to the limited number of these designated employment sites and the large number of other significant employers not located in these areas. One such example is the large employment area to the south of Factory Lane in Branham that is a significant local employer, but is not recognised as a Strategic Employment Site.	This has been considered further but it has been decided to retain the use of Strategic Employment Sites and Enterprise Zones, as these are the sites considered to be of such significance to the local economy and employment to be identified in policy in the JLP. It is recognised that there are other locations that provide employment, of varying scales, but it is the strategic sites that are considered most likely to give rise to significant effects.

¹ Debenham is a district centre from a retail perspective, but in the settlement hierarchy it does not contain the same levels of services, facilities and employment opportunities as a Market Town/Urban Area and is therefore classified as a Core Village.

Respondent	Representation	Response
	Recommendation: The definition of a centre of employment should be widened to include other large industrial estates and business parks not included as Strategic Employment Sites or Enterprise Zones.	Although Factory Lane in Brantham is not identified as a Strategic Employment Site, Policy SP05 (Employment land) makes reference to employment-led regeneration in Brantham.
	Criteria 7c (Minerals Consultation Area, existing, planned or potential mineral extraction sites: We have reviewed the Suffolk Minerals & Waste Local Plan's maps which identify c.50% of the two districts as being within the Minerals Consultation Area, but by comparison only show a handful of existing and proposed extraction sites. It is therefore clearly inappropriate for these two characteristics to be assessed in the same way. The Hopkins Group agree that being within 250m of a sand or gravel extraction site should be considered a significant constraint that warrants a major negative in the site assessment process, but fundamentally disagree that just being within a Minerals Consultation Area is a constraint worthy of a negative score. The purpose of Minerals Consultation Areas is to highlight when the Minerals Planning Authority should be consulted on planning applications so that they can set conditions to ensure that minerals resources are not neutralised by development. As a policy designation it is not intended as a constraint to development, but rather a cue for consultation. Recommendation: Remove being within 250m of a Mineral Consultation Area from the criteria.	Minerals Consultation Areas ensure that the Mineral Planning Authority is aware of and involved in the determination of development proposals which may impact upon identified minerals resources to ensure that the resources are not unnecessarily sterilised. As such, the Minerals Consultation Areas are a good indication of where known deposits of minerals are desired to be kept safeguarded from unnecessary sterilisation by non-mineral development. It also helps to distinguish between those sites that are within a Minerals Consultation Area and those that are not However, in acknowledgement of the point raised by the consultee, if a site is located within a Minerals Consultation Area, a minor negative score has been recorded. This distinguishes it from sites within 250m of a minerals site, existing or proposed, which have been given a major negative score.
	Criteria 11a (Internationally and nationally designated biodiversity assets): Hopkins Group do not object to this criteria, but would highlight that SSSI Impact Risk Zones do not just highlight the type of development, but also the scale of development that proposes a risk to the SSSI. For example, Natural England may specify for a particular zone that residential development over 50 dwellings is likely to negatively impact the SSSI. In this respect it is clear sites proposed for fewer than 50 dwellings should not be scored negatively. Recommendation: Amend criteria to read "...within SSSI Impact Risk Zone for the relevant type and scale of development."	The site assessment criterion 11a has been adjusted to reflect the scale of development in accordance with the Natural England SSSI Impact Risk Zone categories as requested by the consultee.
	Criteria 12a (Nationally and locally designated and non-designated heritage assets): The criteria includes no description or objective criteria for how such effects will be assessed. It is surely beyond the scope of the SA to undertake a detailed heritage assessment of each site and in the absence of objective measurements on which to base the assessment, the Hopkins Group are concerned that this criteria would be open to subjective bias. Recommendation: To ensure an accurate and objective assessment of the potential site allocations, it is critical that this criteria is amended to include a detailed description of how likely effects will be assessed. The Hopkins Group recommend that this should include criteria based on the significance of the asset/s in question and the relationship of the site to the asset (based on proximity and inter-visibility).	LUC has been commissioned by BMSDC to undertake a Heritage Impact Assessment. The results of this assessment have informed the appraisal of sites against criterion 12a.

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	Criteria 13a (Landscape sensitivity): The Hopkins Group do not object to landscape sensitivity being used to assess sites, but there needs to be a clear description of how sites are to be assessed. Recommendation: To ensure an accurate and objective assessment of the potential site allocations, it is critical that a methodology is provided for the assessment of landscape sensitivity. This should focus on the presence or absence of valued landscapes such as Areas of Outstanding Natural Beauty.	LUC was commissioned by BMSDC to undertake a Landscape Sensitivity Assessment. The results of this assessment have informed the appraisal of sites against criterion 13a.
	Criteria 16c (Cycling): This criteria does not provide a definition of what a 'cycle way' is. A 'cycle way' could be interpreted as one of a handful of national and regional cycle network routes in the JLP area, or alternatively it could simply be a strip of red tarmac indicating a cycle priority lane along a road. Recommendation: To ensure an accurate and objective assessment of the potential site allocations, it is critical that a definition of 'cycle way' is provided.	A cycle way is defined in this instance as any National Cycle Route and Local Cycleways as recorded on BMSDC GIS data layers.
Braintree District Council	No comments.	Noted.
Stuart H. Carruthers	There has been a closure of the Gypsy / Traveller site on Mendlesham Road Mendlesham / Wetheringsett cum Brockford (21 pitches). 2 additional pitches have been provided.. Others decanted from the site are seeking an additional eight pitches on Brockford / Mendlesham Road. The Mid Suffolk District Council generates an amazing amount of false information particularly related to addressing.. this seems to be in conflict with its role as street numbering and naming authority. How is this to be resolved.? The Mid Suffolk District Council had to admit to using information different to that provided by the Environment Agency. How is this to be resolved ? The Mid Suffolk District Council is unable to prove a large number of its planning charges (failures in registration). This removes a large area of land from potential development. How is this to be resolved ?	Not explicitly a comment on the SA and does not indicate the need for any change to its findings.
East Bergholt Parish Council	It should be noted that as well as having a 'made' Neighbourhood Plan, East Bergholt is currently engaged in a review of this plan, which, it hopes can run in parallel with the JLP timeline and be informed by the work of the emerging JLP.	Noted.
	In Chapter 3, page 26, SA objective 4 – it cannot be assumed that without the JLP that house prices would continue to rise and remain an issue. House prices are subject to wide ranging	Sentence has been changed to "...house prices would respond to changes in the housing market and over the long-term, would most likely rise."

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	macro factors as well as local drivers and they could just as easily fall as they could rise, especially where local demand is insufficient.	
	In Chapter 5, Table 5.2, SA objectives 6 and 16 – it is noted that the JLP has the potential to direct new development to the most sustainable locations so as to minimise the need to travel by private vehicle. It is hoped that Babergh considers this opportunity seriously when it reviews its spatial strategic options in light of the SA results.	Noted.
	In Chapter 11 the SA Framework and Method of Approach are set out. The transparency is welcomed.	Noted.
	Paragraph 11.6 states that the SA approach will provide 'the performance of the sites against the site assessment criteria and assumptions used, along with the other technical assessments that are used to inform BMSDC's selection of individual sites.' It is hoped that this will provide the LPA with the opportunity to provide a clear and robust justification for their site allocations.	Noted.
	Paragraph 11.26 also refers to the identification of cumulative impacts of site allocations and this is welcomed.	Noted.
	Chapter 12 – the testing of the 9 different Spatial Strategies is welcomed.	Noted.
	Appendix B3 site assessment criteria and assumptions – Public transport provision across the Districts, particularly in the most rural areas, is generally poor. For this reason, proximity to a bus stop is only a helpful comparative indicator if for each bus stop the frequency with which buses actually stop can also be recorded. Unless proximity can be weighted by buses per day this is not a useful sustainability indicator and probably meaningless. Wifi and broadband capacity and plans for upgrades and timescales are important indicators against which employment sites and housing sites should be assessed. Sites with strong connectivity will improve the quality of work, domestic and leisure activities and make those sites more sustainable. There did not seem to be any reference to these aspects.	We have investigated whether it is possible to identify those bus stops or corridors that are on frequent service routes, from those that are not. Unfortunately, no reliable up-to-date data were available, and there are frequent changes to bus services. Therefore, it was decided to retain the measure of access to a bus stop. Access to broadband was considered for inclusion, but it was decided not to use it as a criterion because the data were not considered to be robust in terms of being up-to-date, and because the situation regarding quality of broadband access changes rapidly.
Mr Chris Edwards	The SA is ineffective to scope the transport issues in Mid Suffolk and does not take account of the SOCG with Ipswich Babergh and East Suffolk in relation to transport mitigation, specifically in relation to the unique geographical position of Stradbroke. The village is on the interface between a lorry cut through route from the A12 to the A143, and in the preferred location for broiler factories to serve Cranswick Chicken Eye. There is one exit B1118 to Diss, but three entry points into the village. Social and environmental impacts of scale growth on the made NP have not been modelled.	The role of the SA Scoping Report is to review plans, policies and programmes relevant to the Local Plan, summarise the existing baseline with regards to sustainability topics, identify key strategic issues for the Districts and set out the SA Framework to use in future assessments. However, it is clear from a number of consultees' comments that there is a lot of concern regarding HGV movements in rural locations, particularly around Eye and Stradbroke. These issues have more of a bearing on the Local Transport Plan and management of the road network than proposals in the JLP, but the issue has been acknowledged in the SA (see the

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		baseline section of 'Transport, Air Quality and Noise' in Appendix B (Policy Review and Baseline Information) of this SA Report).
Eye Town Council	Sections 2.69 & 2.71 shows height of the proposed chimney incorrectly as 35 metres. There is no strategy offered for future management of traffic nor evidence to justify the statement that this will be minimal.	The Drax Group (Progress Power Station is a subsidiary business of Drax Group) state on their website that the chimney will be up to 35 metres in height. The SA is not responsible for developing a strategy for future traffic management related to Progress Power. SA in an assessment process designed to consider and report upon the significant sustainability issues and effects of a plan.
	Paragraphs 5.16-23 do not recognise the dangerous level of current HGV traffic movements in Eye. It should contain a specific policy to address traffic matters for Eye and surrounding area. The proximity of dwellings to the roadway should be material consideration for development of traffic and air quality policies.	The role of the SA Scoping Report is to review plans, policies and programmes relevant to the Local Plan, summarise the existing baseline with regards to sustainability topics, identify key strategic issues for the Districts and set out the SA Framework to use in future assessments. However, it is clear from a number of consultees' comments that there is a lot of concern regarding HGV movements in rural locations, particularly around Eye and Stradbroke. These issues have more of a bearing on the Local Transport Plan and management of the road network than proposals in the JLP, but the issue has been acknowledged in the SA (see the baseline section of 'Transport, Air Quality and Noise' in Appendix B (Policy Review and Baseline Information) of this SA Report).
	Figure 6.1 on page 65 the waste site delineation should be clarified, no proposal offered to mitigate light pollution.	Figure 6.1 (Figure B.12 in this SA Report) shows the location of waste sites across both Districts, forming part of the baseline information. SA in an assessment process designed to consider and report upon the significant sustainability issues and effects of a plan. The SA has appraised all site options and policies.
Gladman	The March 2020 SA Scoping Report consultation document includes a summary of comments that have previously been made in relation to the SA for the emerging Joint Local Plan at Appendix A-1, however this does not appear to include a reference to the submissions that have previously been made by Gladman regarding the SA. Through our previous representations, we have consistently highlighted that the Councils should ensure that the results of the SA process clearly justify any policy choices that are made, including the proposed site allocations (or any decision not to allocate sites) when considered against 'all reasonable alternatives' in the Local Plan. Undertaking a comparative and equal assessment of each reasonable alternative, the Council's decision making, and scoring should be robust, justified and transparent. Gladman also highlighted that the SA process is iterative and as such will need to be updated as the Local Plan preparation continues. Should representations suggest a reasonable alternative which has not already been tested by the Council through its SA, Gladman suggest that this should also be tested through a future version of the SA ahead of the submission of	Gladman's representations on previous SA documentation have been reviewed. BMSDC is responsible for identifying reasonable alternatives, which are then subject to assessment through the SA, although LUC has advised BMSDC where appropriate. Similarly, BMSDC is responsible for making decisions regarding which sites to allocate and which to discount, taking into account the findings of the SA alongside other evidence base and public consultation responses. The reasons for BMSDC including or discounting reasonable alternative sites as allocations are recorded in Appendix G (Reasons for Selecting or Rejecting Site Options) of this SA Report. In the supporting text to JLP Policy SP04 (Housing Spatial Distribution) BMSDC set out the criteria that new settlement proposals need to meet to be considered reasonable alternatives. BMSDC have carried out an evaluation of the new settlement submissions from various promoters and have concluded that none of the new settlement proposals are reasonable

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	the Local Plan to the Secretary of State. This is particularly pertinent in the context of Gladman's representations, which included the location of a proposed new settlement.	alternatives for this JLP. This is presented in Chapter 6 (Sustainability Appraisal of Reasonable Alternative Sites) of this SA Report. The supporting text to Policy SP04 states that BMSDC are minded to give consideration to new settlement proposals in the next review of the JLP, which is due to take place within five years of adoption of this JLP..
Highways England	It is noted that there is one transport-related SA objective (16) which is 'to encourage efficient patterns of movement and the use of sustainable methods of travel in support of economic growth.' Highways England recognises that in a largely rural area such as Babergh and Mid Suffolk, this objective could be challenging to achieve in some cases, however we welcome its inclusion in the SA.	Noted.
	With regards to Appendix B Table B.3 Site Assessment Criteria and Assumptions, a set of criteria is defined for the three sustainable travel modes – rail, bus and cycling – in terms of how accessible they are from spatial development options which is expressed across a series of distance bands aligned with the SA scoring matrix, ranging from Major Positive (++) to Major Negative (--). For access to bus stops, a Major Positive (++) is based on a site being within 200m of a bus stop; a Minor Positive (+) being within 201-400m of a bus stop; a Minor Negative (-) being within 401-800m of a bus stop; and a Major Negative (--) being within 800m or more of a bus stop. The distance bands are considered appropriate and broadly align with Institute of Highways and Transportation guidance. Recognising, however, the rural nature of Babergh and Mid Suffolk and the strong possibility that some of the spatial development options could be in locations where existing bus stops are not well served by existing bus services, distance alone may not be an accurate measure of accessibility and sustainability. To illustrate the point, it may be possible that a development site which is less than 200m of a bus stop which is served by an infrequent bus service (say one bus or less an hour) and hence scored as 'Major Positive (++)' is less sustainable in this regard than a site which is between 201-400m of a bus stop which is served by a more frequent service (say two or more buses an hour) but is scored as 'Minor Positive (+)'. If timetable data is readily available, combining distance and service frequency could provide a more robust assessment of site options. We note that the SA assessment will be conducted on a 'Policy Off' appraisal basis and will not therefore take account of potential mitigation.	We have investigated whether it is possible to identify those bus stops or corridors that are on frequent service routes, from those that are not. Unfortunately, no reliable up-to-date data were available, and there are frequent changes to bus services. Therefore, it was decided to retain the measure of access to a bus stop. Note: we have increased the distances to bus stops in light of evidence that the IHT guidelines may be too constrained (see response to Pigeon Investment Management below).

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	Highways England considers the nine spatial strategy options to be suitably diverse to enable a comprehensive assessment of the varying development constraints and opportunities. We do not consider there to be other clearly distinguishable spatial strategy options to be added. It will be helpful for the SA to provide explanation for what criteria will be used to determine a sustainable travel corridor under Spatial strategy option 6. To reiterate the response to Question 5 above, it is suggested that this considers not simply the presence of sustainable travel options but the quality/quantity of those options for example frequency of services, key destinations served etc.	We have investigated whether it is possible to identify those bus stops or corridors that are on frequent service routes, from those that are not. Unfortunately, no reliable up-to-date data were available, and there are frequent changes to bus services. Therefore, it was decided to retain the measure of access to a bus stop. BMSDC has defined those transport corridors that have either the best existing or greatest potential for enhanced public transport as being The London – Cambridge and London – Norwich rail routes and the A12, A14 and (to a lesser extent) A140 roads.
Ipswich Borough Council	Request that the following paragraphs are amended for consistency with the emerging Ipswich Local Plan Review 2018-2036: Paragraph 2.63 The Ipswich Local Plan 2011-2031 was adopted in 2017 and comprises a Core Strategy and Policies Development Plan Document Review (2017), in addition to a Site Allocations and Policies Development Plan Document (2017). However, Ipswich Borough Council is now consulting on the Ipswich Local Plan Review 2018-2036, which consists of a Final Draft Core Strategy and Policies Development Plan Document Review, in addition to a Final Draft Site Allocations and Policies Development Plan Document. Paragraph 2.64 According to the Core Strategy and Policies Development Plan Document Review (Final Draft), the Council has a housing requirement of at least 8,010 dwellings for the period 2018-2036. This equates to an annual average of at least 445 dwellings. The Council will additionally allocate land to provide for at least 6,100 dwellings in the Borough. The Ipswich Garden Suburb development will contribute significantly to meeting the housing needs of the Borough throughout the plan period. At paragraph 2.64 it is stated that the housing requirement for Ipswich Borough Council is 8,010 dwellings, equating to an annual average of at least 445 dwellings. Whilst it is correct to reference this directly from the policy, a footnote or qualifying paragraph needs to be included to make clear that due to the publication of the Government affordability ratios on 19th March 2020, the ratio for Ipswich increased from 6.82 in 2018 to 7.44. The effect on the Ipswich housing requirement set out through the regulation 19 draft Local Plan is as follows: The Ipswich housing requirement increases from 445 dwellings per annum (dpa) to 460 dpa. This is a change for the whole plan period from 8010 dwellings to 8280 dwellings.	Paragraphs amended to reflect the current status of the Ipswich Local Plan Review 2018-2036.
	Chapter 4 does not include the New Anglia Local Enterprise Partnership Economic Strategy. This should be included under the sub-national list.	Reference to the New Anglia Local Enterprise Partnership Economic Strategy has been added to the policy context section for the section 'Economy' in Appendix B (Policy Review and Baseline Information) of this SA Report.
	Chapter 6 needs to reference the Environment Agency Plan for the East of England and the Anglian Water Services Water Resources Management Plan. Also recommended that the	Reference to the Anglian Water Resources Management Plan has now been added to the policy context section for 'Land and Water Resources'. The Ipswich and Suffolk Coastal Joint

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	Ipswich and Suffolk Coastal Joint Water Cycle Study is included given that the rivers flow across different authority boundaries	Water Cycle Study has not been added to the policy context section because it is a study instead of a strategy.
	The sub-national section of Chapter 8 should cite the Recreational Avoidance and Mitigation Strategy Supplementary Planning Document (SPD) and not just the technical report	Reference to the Recreational Avoidance and Mitigation Strategy Supplementary Planning Document (SPD) has now been added to the policy context section in the section 'Biodiversity' in Appendix B (Policy Review and Baseline Information) of this SA Report.
	Chapter 10 - the joint Settlement Sensitivity Assessment undertaken by all ISPA authorities is not referenced and should be under sub-national.	The Settlement Sensitivity Assessment is not considered to provide policy context, rather it provides assessment results. Therefore, this document has not been referenced in the policy context section. This study has been taken into account in LUC's Landscape Sensitivity Assessment.
	Figure 3.1 fails to identify all of Ipswich's education facilities and GP practices. Examples include Suffolk New College, University of Suffolk and The Chesterfield Drive Surgery.	Figure 3.1 (Figure B.1 in this SA Report) was generated using up-to-date information provided by BMSDC. The University of Suffolk and Suffolk New College are marked on the map. However, their points were partially hidden behind the 'Ipswich' label. The map has been updated to clearly display both educational establishments. The GIS shapefile for Chesterfield Drive Surgery was not provided but has now been added.
	Figure 4.1 does not identify the employment sites and Enterprise Zones in Ipswich. As per the reasoning set out in response to figure 3.1, this is required due to the close relationship in Spatial Strategy Option 1.	Figure 4.1 (Figure B.4 in this SA Report) contains all recognised employment sites and Enterprise Zones within both Districts. Employment sites and Enterprise Zones in Ipswich have been taken into account in the site assessments, which required GIS data to be provided by Ipswich BC.
	As per above, but for the transport network in Figure 5.3.	National cycle routes have now been added to Figure 5.1 (Figure B.7 in this SA Report). Figure 5.3 (Figure B.9 in this SA Report) displays air quality in the area, specifically PM _{2.5} concentrations.
	Figure 7.1 - There should be an equivalent flood risk map for surface water flood risk and not just fluvial/ tidal flooding as shown.	Figure 7.1 (Figure B.15 in this SA Report) uses nationally available datasets. BMSDC have commissioned a Strategic Flood Risk Assessment (SFRA), the findings of which are reported upon in this SA Report.
	Figure 9.3 does not show the Ipswich heritage at risk assets; however, it includes such information for all other authorities. The omission of IBC information is not explained. This information should therefore be included.	Figure 9.3 (Figure B.20 in this SA Report) has now been updated to include heritage at risk assets in Ipswich, using information to be found at Information can be found here: https://www.ipswich.gov.uk/content/looking-after-buildings-risk .
	Paragraph 4.19 should reference that the two authorities fall within the Ipswich Travel to Work area which is partly responsible for the high levels of outward commuting. The bullet point list	Text has been amended as requested.

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	only references the imbalance of housing and jobs as the reason for the high levels of outward commuting.	
	Paragraph 5.19 Traffic Growth and road projects only focuses on the impact of development on Babergh/Mid Suffolk's traffic and road. However, given the relationship with Ipswich as a travel to work area, as well as spatial option 1, there needs to be recognition that the impacts on traffic and roads in Ipswich needs to be adequately assessed.	The potential impact of traffic in relation to Air Quality Management Areas (AQMA's) in Ipswich has been addressed in the SA Report. These directly relate to traffic movements and related air pollution.
	Paragraph 5.34 Air Quality does not reference the impact of future traffic growth from Babergh/Mid Suffolk on the AQMA's in Ipswich. It only references the fact that there are five AQMA's in Ipswich but fails to identify the impact that inward and outward commuting to/from Ipswich will have on these.	Text has been amended as requested.
	Chapter 6 needs to highlight how poor water quality can impact on other authorities downstream and is not confined to administrative boundaries.	Text has been added as requested.
	Digital infrastructure improvement should be included in SA framework.	Access to broadband was considered for inclusion, but it was decided not to use it as a criterion because the data were not considered to be robust in terms of being up-to-date, and because the situation regarding quality of broadband access changes rapidly..
	The criteria and assumptions for appraising potential site allocations is appropriate.	Noted.
	The options are considered to be reasonable alternatives. However, Spatial Strategy Option 1 must make clear that the pursuit of this option may require any identified unmet needs of Ipswich Borough Council, particularly as this would develop land immediately adjacent to the Borough.	Noted. BMSDC refer to the Statement of Common Ground to address the issue of unmet need.
Sue Ives	The Joint Local Plan Sustainability Appraisal (March 2020) seeks views on "whether the baseline information provided is robust and comprehensive and provides a suitable baseline for the SA of the Local Plan." I agree with Stradbroke Parish Council (point 11) insofar as the WSP transport study, used to provide baseline data for the SA, is too narrow in scope; it should be broadened to include the cumulative impact on main and rural road networks in High Suffolk as a result of the development of the Cranswick chicken meat processing factory on Eye Airfield, which was completed in November 2019.	The role of the SA Scoping Report is to review plans, policies and programmes relevant to the Local Plan, summarise the existing baseline with regards to sustainability topics, identify key strategic issues for the Districts and set out the SA Framework to use in future assessments. However, it is clear from a number of consultees' comments that there is a lot of concern regarding HGV movements in rural locations, particularly around Eye and Stradbroke. These issues have more of a bearing on the Local Transport Plan and management of the road network than proposals in the JLP, but the issue has been acknowledged in the SA (see the baseline section of 'Transport, Air Quality and Noise' in Appendix B (Policy Review and Baseline Information) of this SA Report).

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	The Sustainability Appraisal Scoping Report makes reference to National Planning Policy Framework (NPPF)70 which: 'Encourages local planning authorities to consider transport issues from the earliest stages of plan making so that: the environmental impacts of traffic and transport infrastructure can be identified and assessed'. I agree with Eye Town Council (point 4.3) in relation to the need to assess the cumulative impact of 'each application'. It needs to be understood that each poultry feeder site is part of a network of supply sites to the Cranswick meat processing factory and each has its own complex logistical network consisting of numerous HGV deliveries of eggs/chicks, feed, bedding and fuel from various locations, HGV collection of waste litter to be transported to power stations or anaerobic digesters nearby or spread on the land, mortalities and dirty water to be dispensed with at other locations and birds destined for the factory at the end of the crop cycle; each site operates on different production cycles, which can be anywhere between 5 to 7 weeks, at the end of which the sheds are emptied, cleaned and made ready for the next crop of birds. Routes to the meat factory will overlap and will have a cumulative effect on rural roads and villages. The larger the site, the more HGV traffic generated. All of this evidence points to the fact that the Cranswick factory development at Eye Airfield and its growing supply chain network has already resulted in a cumulative increase in HGV movements across main and rural road networks in High Suffolk. The full extent of this has not been adequately quantified and so the Sustainability Appraisal statement contained in 5.19 "The modelling shows future traffic growth for 2026 and 2036, as a result of changing patterns of travel behaviour and predicting future traffic impacts. The growth assumptions for the modelling consider population growth and specific development locations ..." would suggest that the model did not include the factory and its supplier network in its entirety and as such, cannot be regarded as 'robust and comprehensive'. The Cranswick factory development and its operations will contribute to increasing traffic volume and capacity issues highlighted by Stradbroke Parish Council and Eye Town Council in each of their submissions to the Sustainability Appraisal Scoping Report consultation.	The role of the SA Scoping Report is to review plans, policies and programmes relevant to the Local Plan, summarise the existing baseline with regards to sustainability topics, identify key strategic issues for the Districts and set out the SA Framework to use in future assessments. However, it is clear from a number of consultees' comments that there is a lot of concern regarding HGV movements in rural locations, particularly around Eye and Stradbroke. These issues have more of a bearing on the Local Transport Plan and management of the road network than proposals in the JLP, but the issue has been acknowledged in the SA (see the baseline section of 'Transport, Air Quality and Noise' in Appendix B (Policy Review and Baseline Information) of this SA Report). Policy LA099 (Allocation: Land at Eye Airfield, Eye) in the JLP requires provision of a transport assessment to determine existing and projected capacity and any mitigation required.
	On a separate point, the Joint Local Plan Sustainability Appraisal (March 2020) seeks views on whether there are any additional key sustainability issues relevant to the plan area that should be included. LUC27 states that 75% of Mid Suffolk's population lives in rural areas (SA objectives 1, 3 & 14). Recent Scoping Enquiries for new developments of poultry feeder sites and planning applications to expand existing poultry sites will have a significant detrimental effect on the health and wellbeing of rural communities	The development of poultry feeder sites is not considered a key sustainability issue. However, the SA Framework does contain a SA objective on health and wellbeing (SA Objective 1) for each site option and policy to be appraised against.
Mr James Lawson	The JLP SA scoping process is not currently robust and as a result the housing growth strategy for the JLP Hinterland and Hamlet Villages is considered to be inconsistent, proportionally imbalanced and inappropriate - please see objection supporting document.	Spatial strategy option 4: Proportionate growth – all settlements increase in size in proportion to current population and Spatial strategy option 5: Hierarchical growth – distributing development according to the settlement hierarchy, considers the relative performance against

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		all other spatial strategy options, and includes reference to all settlement types in Babergh Mid Suffolk
Lawson Planning Partnership Ltd. on behalf of M Chisnall & Sons Ltd.	Our client is promoting land for housing in Whatfield, which is identified as a 'Hinterland Village' in the draft Joint Local Plan. Although sustaining a range of facilities, services and infrastructure provision, Whatfield is considered a 'middle ranking' Hinterland Village. Having identified local housing needs, it's not allocated any housing growth or identified for any minimum Neighbourhood Plan housing requirement across the plan period to 2036. The Sustainability Appraisal process (to date) lacks robustness, has omissions and is incomplete. The LUC SA Scoping Report is welcomed, as an opportunity to address the earlier errors and omissions associated with the SA of the Regulation 18 Preferred Options JLP, and as a process to provide a more robust approach to the identification and assessment of potential housing growth areas, particularly at the village level.	Spatial strategy option 4: Proportionate growth – all settlements increase in size in proportion to current population and Spatial strategy option 5: Hierarchical growth – distributing development according to the settlement hierarchy, considers the relative performance against all other spatial strategy options, and includes reference to all settlement types in Babergh Mid Suffolk. All reasonable alternative individual sites have been subject to SA.
	There is a clear planning rationale and justification for the settlement hierarchy growth and housing distribution strategies for Hinterland and Hamlet Villages to be reviewed, as part of the JLP Sustainability Appraisal update process.	Spatial strategy option 4: Proportionate growth – all settlements increase in size in proportion to current population and Spatial strategy option 5: Hierarchical growth – distributing development according to the settlement hierarchy, considers the relative performance against all other spatial strategy options, and includes reference to all settlement types in Babergh Mid Suffolk
	In Chapter 13 of the SA Scoping Report, LUC invite comments from stakeholders and the public on specific aspects of the SA process which are contained in paragraph 13.2. LPP's comments in relation to these specific consultation areas are outlined in the chronological order as they appear in the SA document below. Whether there are any additional plans, policies or programmes that are relevant to the SA that should be included: No comments to make at this stage.	Noted.
	Whether the baseline information provided is robust and comprehensive and provides a suitable baseline for the SA of the Local Plan: The baseline information in respect of the SA of the local plan is not considered to be sufficiently robust or comprehensive, as the appraisal and validation of all the village settlement boundaries (Place Maps) within the Plan Area is out of date, unreliable and incomplete. In the absence of an up to date assessment of current settlement boundary context and site locations, the application of Built Up Area Boundary and Countryside Policy (both strategic and local policy) to determine growth locations and levels is incomplete, and therefore flawed in SA terms.	The baseline information has been written using the most up-to-date information available. The assessment includes criterion 7a to distinguish whether it is greenfield or brownfield land, rather than placing reliance on settlement boundaries. Spatial strategy option 4: Proportionate growth – all settlements increase in size in proportion to current population and Spatial strategy option 5: Hierarchical growth – distributing development according to the settlement hierarchy, considers the relative performance against all other spatial strategy options, and includes reference to all settlement types in Babergh Mid Suffolk.

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	A comprehensive assessment of at least the village settlement boundaries is therefore advocated - to assist with the process of devising appropriate housing allocation and neighbourhood plan housing requirement strategies, in order to prepare a 'Sound' Local Plan. The need for this in the Babergh part of the plan area, is emphasised by the JLP's own evidence which indicates at Table 3.1 of the SA Scoping Report, that the workforce median house price to median earnings ratio increased from 8.91 in 2014 to 11.39 in 2019, being some '1.67' points above the East of England average. An inappropriate and inconsistent approach to the distribution of housing within the Babergh Hinterland and Hamlet villages, would serve to negate necessary provision for local housing needs, and hamper the retention of much needed local facilities, services and infrastructure provision, including community vitality, which ought to be fostered.	
	Whether there are any additional key sustainability issues relevant to the plan area that should be included: Insufficient recognition is considered to have been given to the potential impact (and related SA implications) of allocated sites and neighbourhood plan housing requirements upon designated biodiversity assets and designated landscapes. Further analysis and assessment are therefore advocated, with increased recognition being given to potential settlement locations where housing growth is less likely to adversely impact on biodiversity and landscape assets, through increased recreational pressure associated with population growth.	All site allocations have been re-appraised in this SA Report. The SA Framework contains a SA Objective on biodiversity (SA Objective 11). Therefore, all site options have been appraised in relation to biodiversity. There is also an objective for landscape (SA objective 13), the appraisals of which have been informed by a Landscape Sensitivity Assessment undertaken by LUC. Existing commitments have been taken into account in the SA.
	Whether the amended SA Framework (Chapter 11) is appropriate and includes a suitable set of SA Objectives: The SA Framework is generally considered to be appropriate. The NPPF paragraph 8 policy requirement - to contribute to the achievement of sustainable development through 'social objectives' to support strong, vibrant and healthy communities is absent, however, and is considered to warrant an objective in its own right. This would help to ensure that village based facilities and services are appropriately sustained, in particular, by directing a sufficient number and range of homes to 'Hinterland Villages' in the Plan Area, which would also help to meet the local housing needs of present and future generations. Inclusion of an additional SA objective relating to "contributing to the achievement of sustainable development through social objectives to support the vitality of and provide for strong, vibrant and healthy communities" is therefore advocated.	The SA Framework outlined in Table 11.1 comprises a set of 16 SA Objectives, each of which is accompanied by a series of guide questions that have been used to appraise the JLP. There is overlap of the social, economic and environmental aspects of sustainable development between these objectives. A number of them are considered 'social objectives', specifically SA Objectives 1, 2, 3 and 4. Spatial strategy option 4: Proportionate growth – all settlements increase in size in proportion to current population and Spatial strategy option 5: Hierarchical growth – distributing development according to the settlement hierarchy, considers the relative performance against all other spatial strategy options, and includes reference to all settlement types in Babergh Mid Suffolk

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	Whether the criteria and assumptions for appraising potential site allocations are appropriate for this stage of the SA process, and a suitable refinement on those used to date: SA Objective 4 “to meet the housing requirements of the whole community” within Table B3 (Site Assessment Criteria & Assumptions) of the SA Scoping Report is not considered to be appropriate. Scoring sites on the basis of their ability to accommodate 500 dwellings or more/ 500 dwellings or less, is not sufficiently ‘refined’ to reflect the growth needs of the Plan Area, or consistent with the wider focus upon identifying land for homes set out in the NPPF. Paragraph 68 of the NPPF states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built out relatively quickly. Furthermore, to promote the development of a good mix of sites planning authorities are required to identify land to accommodate at least 10% of their housing requirement on sites no larger than 1 ha. Paragraph 69 of the NPPF reflects a similar requirement for Neighbourhood Plan Areas, where opportunities should be taken to allocate small (< 1ha) and medium sized sites suitable for housing in their area. With this in mind, and in order to facilitate the NPPF 10% small sites requirement, the remit of SA Objective 4 ought to be widened to include: ■ A scoring criterion for small (< 1ha) sized sites at the village level; ■ A scoring criterion for small (< 1ha) sites which additionally have ‘made’ and ‘emerging’ neighbourhood plans; and ■ A scoring criterion for small (< 1ha) sites which constitute previously developed or otherwise vacant & underused land.	It is accepted that small sites make a significant contribution to housing delivery, although this is on a cumulative basis, rather than each site individually. However, large sites on their own are able to make a more significant contribution on their own and are more likely to deliver a range of housing, including affordable housing on-site rather than by way of developer contributions, which merits being drawn out in the SA. However, in recognition of the rural nature of Babergh Mid Suffolk, and that large-scale sites are rare, the thresholds have been reduced to reflect the housing requirements of each of the two Districts, with a major positive effect being scored when a site contributes 250 dwellings or more in line with the BMSDC Joint Local Plan Viability & CIL Review study (June 2019). Smaller sites receive a minor positive effect.
	Whether the overall spatial strategy options represent a suitable and reasonable set of alternatives, and that no other clearly distinguishable spatial strategy options should be added: The spatial strategy options outlined in paragraph 12.8 of the SA Scoping Report are considered to represent a suitable and reasonable set of alternatives, noting that the ‘preferred spatial strategy’ is likely to be a combination of two or more of the spatial strategy options. It is also noted that the level of ‘consented development’ will be taken into account in determining the suitability of identifying new sites, which is welcomed. This approach would be particularly important in providing for a more ‘proportionally balanced’ level of growth within the Hinterland and Hamlet Villages. With this in mind, and as outlined earlier in this submission, it is evident that there are a number of settlement locations where ‘less sustainable villages’ are identified for further housing growth, being significantly in excess of a number of ‘more sustainable villages’, where	Noted.

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	no new housing growth has been allocated or directed as part of the JLP process, including locations where a neighbourhood plan process is ongoing. Such an approach is considered to be inconsistent with NPPF policy for identifying an appropriate mix of sites to meet the housing needs of the Plan Area as a whole, and is an allocation (and neighbourhood Plan housing requirement) strategy which is considered to be inappropriate and unsound in SA and wider plan making terms. Such an approach would fail to sustain existing community facilities, services and infrastructure, and would not foster community cohesion and vitality. It would also exacerbate the pressing demand for a mix of low cost housing to meet local needs, in a context (within Babergh) where the workforce median house price to median earnings ratio is some 1.67 points above the East of England average	
Marine Management Organisation	Babergh and Mid Suffolk overlap with the South East Inshore Marine Plan area. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. The South East Marine Plan extends from Felixstowe to Dover, including the tidal extent of any rivers within this area. In the case of Babergh, the overlap includes the tidal extent of the Rivers Stour and Orwell. The South East Marine Plan is currently out for consultation (closing Monday 20th April 2020) and is therefore material for consideration. The South East Marine Plan is relevant to the SA and should be included.	Reference to the South East Inshore Marine Plan (Draft) has been added to the policy context section for 'Economy'.
	For evidence supporting marine planning, please see Explore Marine Plans , which provides an online GIS-based platform to visualise the evidence underpinning the marine plan policies, as well as our Evidence Projects Register .	Noted.
	The MMO would suggest more consideration for sustainability issues impacting the marine, coastal and tidal waters in the Districts. As per section 58(3) of the Marine and Coastal Access Act, all decision which affects or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the Draft South East Marine Plan.	Reference to the South East Inshore Marine Plan (Draft) has been added to the policy context and baseline section as appropriate.
	No comment on the SA objectives. We suggest the addition of 'minimise' to the mitigation hierarchy.	Noted..
	Draft South East Marine Plan policies which may be of relevance may include (but are not limited to): Co-existence, Aggregates, Dredging and Disposal, Ports and Shipping, Heritage, Seascape, Employment, Climate Change Resilience and Adaptation, Renewables, Air Quality, Water	Noted.

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	Quality, Marine Litter, Access, Tourism and Recreation, Social Benefits, Defence, Aquaculture, Biodiversity, Net Gain, Cumulative Effects and Cross Border Cooperation	
Norfolk County Council	No comments on the SA Scoping Report. It just be noted that the JLP should consider cross-boundary issues, particularly transport, environmental matters and the impact on existing development.	Noted.
Notcutts Limited	The Department for Transport's Road Investment Strategy 2 (March 2020) should be included within the list of relevant plans and programmes.	Included as requested.
	A new settlement at Belstead Farm should be assessed in the SA, it performs well against the proposed Site Assessment Criteria and Assumptions set out in Appendix B of the SA Scoping Report.	BMSDC is responsible for identifying reasonable alternatives, which are then subject to assessment through the SA, although LUC has advised BMSDC where appropriate. Similarly, BMSDC is responsible for making decisions regarding which sites to allocate and which to discount, taking into account the findings of the SA alongside other evidence base and public consultation responses. The reasons for BMSDC including or discounting reasonable alternative sites as allocations are recorded in Appendix G (Reasons for Selecting or Rejecting Site Options) of this SA Report. In the supporting text to JLP Policy SP04 (Housing Spatial Distribution) BMSDC set out the criteria that new settlement proposals need to meet to be considered reasonable alternatives. BMSDC have carried out an evaluation of the new settlement submissions from various promoters and have concluded that none of the new settlement proposals are reasonable alternatives for this JLP. This is presented in Chapter 6 (Sustainability Appraisal of Reasonable Alternative Sites) of this SA Report. The supporting text to Policy SP04 states that BMSDC are minded to give consideration to new settlement proposals in the next review of the JLP, which is due to take place within five years of adoption of this JLP.
Ms Nicky Parsons	We are concerned about the methodology of the scoring system set out in Appendix B for criteria 1, 2, 4, 6, 7, 10, 11, 15 and 16. We suggest amendments to the scoring methodology to better reflect the Sustainability Objectives and the intention to ensure that the SA process has an element of objectivity.	The SA Framework was originally developed by Place Services from the analysis of international, national and local policy objectives, baseline information, and key sustainability issues identified in the plan area. The Site Assessment Criteria and Assumptions set out in Appendix B of the SA Scoping Report were informed by the baseline information and accurately reflect the key sustainability issues identified. The criteria have been selected to be objective – each site has been assessed on a consistent basis.

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	Para 12.13: We note the intention to undertake a fresh SA of all of the potential sites. It will be important that any variation to the scoring is clearly explained in the next SA and we trust that this is your intention.	Noted.
	Figure 11.1 sets out the scoring system that the SA will use. It includes mixed effects, but the scoring set out in Appendix B does not explain how a site will achieve mixed effects. This requires further explanation.	Mixed effects are recorded if both the positive and minor criteria outlined in the Site Assessment Criteria and Assumptions (Table B.3) are met. As an example, and with regard to SA objective 16, if a site is located within 500m of a railway station (++) but 401-800m of a bus stop and a cycle way (-) then a mixed major positive and minor negative effect is recorded. However, where possible, a single 'significance' score has been provided for each SA objective.
	The negative scoping proposed in criteria 1, 2, 15 and 16 for the distance of a site from key services is inconsistent with the walking distance assumptions summarised at Table B.3. Table B.3 includes the preferred maximum walking distances, yet these are used to identify the negative scoring grade. This is not logical as a preferred maximum distance is still an acceptable distance. Walking is recognised as a key health benefit that is to be encouraged and it therefore seems illogical to give a negative grade to a site that is within the 'preferred maximum preferred' walking distance' We suggest that the scoring should be adjusted such that sites that fall within this distance achieve a negligible score at the very least.	There are a number of pieces of research that give a variety of recommended guidance distances for walking. 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 are based on the Institute of Highways and Transportation (IHT) guidance, which divides distances depending upon location and purpose of the trip into three categories: 'desirable', 'acceptable', and 'preferred maximum'. LUC's assessment criteria are therefore also divided into three categories, which is why a fourth category of 'neutral', as suggested by the consultee, has not been used. The IHT category of 'acceptable' implies that anything above this is 'unacceptable' (i.e. worthy of a negative score) although the IHT also uses the category 'Preferred Maximum', and therefore we are of the view that a minor negative score is valid for distances that fall into this category.
	Furthermore, the scoring of a site beyond the preferred maximum distance requires greater consideration. Currently, a site that is 1.2km from a GP facility scores a minor negative and one that is 1.21km would be a major negative. There needs to be a more finely grained scoring system to properly distinguish between those sites that are significantly distant (i.e. significantly beyond the preferred maximum walking distance) from key facilities. Failure to do so will overstate the impacts for some sites that are only marginally beyond the preferred maximum distance.	Sites that fall just over the distance buffers (e.g. 401m from a bus stop) have been appraised in line with the assessment criteria, so as to ensure consistency across all appraisals. Thresholds have to be introduced at some point, and those that are included for the SA criteria are reasonable. Note: we have increased the distances to bus stops in light of evidence that the IHT guidelines may be too constrained (see response to Pigeon Investment Management below). The main purpose, though, is for site assessment criteria to allow objective and consistent scoring of sites, and to enable comparisons between the performance of sites to be made. This is an approach adopted in numerous SAs and found to be sound in examination.
	We disagree with the scoring for the impact of housing schemes (criterion 4) based on the size of a development. All housing development provides a positive impact and Sustainability Objective 4 does not suggest that the positive effects to be measured are confined to a scheme of 500 units or more. This is an unreasonable cut off to use for a district such as Babergh Mid Suffolk that historically delivered smaller sites and arguably where sites below	It is accepted that small sites make a significant contribution to housing delivery, although this is on a cumulative basis, rather than each site individually. However, large sites on their own are able to make a more significant contribution on their own and are more likely to deliver a range of housing, including affordable housing on-site rather than by way of developer contributions, which merits being drawn out in the SA.

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	500 units may be more appropriate. It also fails to take into account that smaller sites tend to be delivered faster than large 500+ sites. We therefore suggest that all major housing applications (i.e. 10 or more) should have a major positive score and minor housing schemes should have a minor positive.	However, in recognition of the rural nature of Babergh Mid Suffolk, and that large-scale sites are rare. The thresholds have been reduced to reflect the housing requirements of each of the two Districts, with a major positive effect being scored when a site contributes 250 dwellings or more in line with the BMSDC Joint Local Plan Viability & CIL Review study (June 2019). Smaller sites receive a minor positive effect.
	Criterion 6 relates to air quality and noise. The assessment criteria identified is likely to require detailed information that is unlikely to be available at the SA stage. It is unclear how this scoring can be applied objectively or accurately, and we recommend that you consider an alternative scoring system for this effect.	It is recognised that localised conditions can alter the potential for noise disturbance, and that mitigation can also play a role. However, at the strategic scale, it is considered to be appropriate to distinguish between those sites that are in closer proximity to sources of noise than those that are not (in line with the precautionary principle). As set out in the criteria: ■ A minor negative effect is given where the site is located within 25km of an AQMA ■ A major negative effect is given where the site is located within 12.5km of an AQMA. There is one AQMA present in BMSDC (Cross Street in Sudbury), five in Ipswich Borough, and two within or close to Bury St Edmunds. UCL's DataShine (Commute) website were used to identify commuting patterns and their relationship to the AQMAs, which resulted in the above criteria being chosen for the SA.
	Criterion 7 relates to minerals and identifies a major negative score for sites that are within 250m of a mineral consultation zone. There is no explanation to justify why a negative score is warranted. A potential negative effect will depend upon the nature of the scheme and the minerals zone that it impacts upon. This is not taken into account by the scoring mechanism proposed and we therefore recommend further review of this.	Minerals Consultation Areas ensure that the Mineral Planning Authority is aware of and involved in the determination of development proposals which may impact upon identified minerals resources to ensure that the resources are not unnecessarily sterilised. As such, the Minerals Consultation Areas are a good indication of where known deposits of minerals are desired to be kept safeguarded from unnecessary sterilisation by non-mineral development. It also helps to distinguish between those sites that are within a Minerals Consultation Area and those that are not However, in acknowledgement of the point raised by the consultee, if a site is located within a Minerals Consultation Area, a minor negative score was recorded. This distinguished it from sites within 250m of a minerals site, existing or proposed, which were given a major negative score.
	We are concerned to see that criterion 10 offers no potential for positive scoring of those sites that are within flood zone 1 or in areas of low surface water flooding risk. This conflicts with SA objective 10, which asks questions about how a site reduces the vulnerability to flooding. This would also seem to contradict the mitigation hierarchy at 11.22, which identifies avoidance of effect as the first priority. We consider this is a major omission of the scoring process.	The SA has been undertaken with reference to flood risk zones. If a site is outside of the relevant flood risk zone it will not be at risk of flooding and therefore it will have a negligible effect on this SA Objective.

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	We are concerned to see that criterion 11 offers no potential for positive scoring of those sites that avoid close proximity to nature conservation/geological sites. This conflicts with SA objective 11, which asks questions about how a site reduces impacts on such areas. This would seem to contradict the mitigation hierarchy at 11.22, which identifies avoidance of effect as the first priority. We consider this is a major omission of the scoring process.	The development of sites in areas where nature conservation/geological sites are present, will not have a positive effect on biodiversity. Instead, they will have a negligible effect. The SA takes a precautionary approach to the assessment of sites.
Pigeon Investment Management and their Landowners	Pigeon continues to support the thrust of the emerging Local Plan, taken as a whole, but has identified within the content of the SA Scoping Report specific aspects which need further consideration and refinement before proceeding onto the production of the Regulation 19 Draft Submission Local Plan. Absence of reasonable alternatives to assess different levels of growth: The SA Scoping Report is silent on how the SA will assess different levels of growth for the District as part of the assessment of reasonable alternatives. This would imply that the Joint Local Plan (JLP) will be predicated only on the minimum housing requirement under the standard method, with no consideration of the merits for planning for higher levels of growth in the District to support economic development aspirations. The SA will also fail to address the identified unmet housing needs from neighbouring authorities. Within the Regulation 18 Consultation, the preferred approach to Policy SP01 – Housing Needs, was to adopt the housing requirement under the standard method. The supplementary text to the policy sets out that there were no alternative options put forward to suggest that the housing requirement should be set at any level other than the local housing need figure. However, the Councils are required to consider alternative options so that they demonstrate soundness and can plan positively for the housing employment and other needs of the two districts including accommodating unmet housing need. A review of Chapter 2 of the Scoping Report reveals that the information relating to the North Essex Authorities and Ipswich Borough Council is not accurate as it does not identify that these neighbouring authorities are likely to require assistance in order to meet their unmet needs.	The local housing need represents a 'starting point' in identifying housing requirements for Babergh and Mid Suffolk. There are a number of other factors to consider when setting the housing requirement. The Strategic Housing and Employment Land Availability Assessment (SHELAA) indicates that there is a sufficient supply of land to meet the housing need set out in the standard methodology. National Planning Practice Guidance sets out that there may be circumstances where additional growth may be required. However, it is important to understand the likelihood of higher levels of growth being delivered. The local housing need figures produced by the Government's standard methodology is significantly higher (approx. 30%-40%) than the current levels of housing delivery. TBMSDC maintain that the JLP aims to set out a proactive approach which can significantly boost the supply of housing land and delivery in the District, consistent with Government policy. Babergh and Mid Suffolk are planning to meet their full identified local housing needs. Unmet housing need has not been identified to Babergh and Mid Suffolk by any neighbouring authorities either within the Ipswich HMA or beyond it. An Ipswich Strategic Planning Area (ISPA) statement of common ground is agreed between authorities in the Ipswich HMA detailing a process to follow should unmet needs become identified. Should it be determined through the plan making process that another authority within the ISPA is unable to meet its minimum housing need, the Councils will, under the duty to co-operate, work collaboratively to determine whether housing development needs that cannot be met wholly within a particular area, could be met elsewhere. An agreement to seek to accommodate unmet housing need would trigger an immediate review of the strategic policies of this Plan.
	Re-evaluation of Spatial Strategy Within the consultation of this Scoping Report, the Councils state that they are going to assess 9 spatial options against the SA criteria to identify the most appropriate way of distributing development across the two Districts. Within these options, Pigeon note that there is no assessment option for a dispersal strategy amongst the villages. It is suggested that this spatial option should be included as a reasonable alternative and subject to an SA for completeness. The methodology should also make it clearer that the preferred strategy would be assessed against the reasonable alternatives for completeness.	Spatial strategy option 4: Proportionate growth – all settlements increase in size in proportion to current population and Spatial strategy option 5: Hierarchical growth – distributing development according to the settlement hierarchy, considers the relative performance against all other spatial strategy options, and includes reference to all settlement types in Babergh Mid Suffolk

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	Assessment criteria are not fit for purpose On review of the baseline and key sustainability issues within the Scoping Report, it is clear that the amended criteria at Appendix B does not address the key sustainability issues identified for the two Districts within the SA Scoping Report. The criteria appear too generic and should be adapted to reflect the predominantly rural nature of the two Districts.	The baseline information in Chapters 3-10 of the SA Scoping Report refers to the overall environmental, economic and social characteristics of both Districts, and provides the basis against which to assess the likely effects of alternative proposals in the JLP. We have identified key sustainability issues from this information, which has been reflected in our amendments to the SA Framework, which was originally developed by Place Services.
	Turning to SA Objective 4 in Appendix B this requires development to meet the housing requirements of the whole community. However, the criteria at 4a in Appendix B for judging this is simply whether the development delivers fewer or more than 500 homes. The issues for the authorities are however far more nuanced than a simple numerical threshold of dwellings and the arbitrary criteria applied to the objective is too coarse and needs to be more refined and sophisticated in scope to meet the key sustainability issues set out in Table 3.7 of the report.	It is accepted that small sites make a significant contribution to housing delivery, although this is on a cumulative basis, rather than each site individually. However, large sites on their own are able to make a more significant contribution on their own and are more likely to deliver a range of housing, including affordable housing on-site rather than by way of developer contributions, which merits being drawn out in the SA. However, in recognition of the rural nature of Babergh Mid Suffolk, and that large-scale sites are rare. The thresholds have been reduced to reflect the housing requirements of each of the two Districts, with a major positive effect being scored when a site contributes 250 dwellings or more in line with the BMSDC Joint Local Plan Viability & CIL Review study (June 2019). Smaller sites receive a minor positive effect.
	A further example relates to SA Objective 14b, which assesses employment sites on the basis of their size, again, either above or below 5 ha. This does not identify whether a site is capable of delivering units for SMEs, will reduce the high levels of outward commuting, or can contribute towards improving the limited rural infrastructure.	It is recognised that this is a simple measure, but it is reasonable to assume that larger employment sites will deliver more jobs than smaller employment sites.
	Chapter 3: Population, Health and Wellbeing Pigeon fully support the conclusions within Paragraph 3.23-3.31 of the SA Scoping Report., which effectively state that: ■ Due to a lack of supply, house prices within the District have been steadily climbing with affordability decreasing every year; and ■ That the number of affordable homes built has been low and must be increased significantly. Given the above, Pigeon would expect to see these issues recognised as key sustainability issues for the District and therefore the SA Framework to respond accordingly. Table 3.7 of the Scoping Report presents the key sustainability issues with respect to Population, Health and Wellbeing with the second row addressing the need for housing. Given the acute shortage of private and affordable housing, Pigeon would recommend (recommendation underlined) that the text within this table be changed to:	The need for affordable housing has been identified as a key sustainability issue. It states: "There is a 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." The proposed re-wording of the issue suggests ways of addressing this issue, which is the role of the SA to appraise when reviewing JLP policies and proposals. Given the significance of the affordable housing issue, we have inserted the adjective 'acute' before need as recommended. This key sustainability issue is reflected in the SA Framework, which contains a SA Objective on housing provision (SA Objective 4): To meet the housing requirements of the whole community. This SA Objective contains the following guide question: "Will it contribute to meeting demand for a range and mix of housing including affordable housing and specialist housing?". Therefore, the issues identified by the consultee should be reflected in the results of the SA.

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	■ There is an acute need for a major increase in the provision of private and 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. Given the need for a significant increase in private and affordable housing, Pigeon request that SA Objective 4 (Population, Health and Wellbeing) which will directly influence the scale and type of housing in the District be amended to: ■ To significantly increase the supply of private and affordable housing within the District to meet the housing needs of the whole community as a minimum.	
	Chapter 4: Economy Pigeon fully support the broad conclusion of the text within the baseline section of this chapter. Pigeon believe that a key output of the SA Scoping Report should be the allocation of additional employment land across the district, particularly in rural areas and the main towns to drive sustainable economic growth.	Noted.
	Chapter 11: The SA Framework and Method of Approach Whilst Pigeon acknowledge and appreciate the purpose of the revised site assessment framework, they do have a number of concerns with the assessment criteria on the basis that they are not cognisant of the Plan's preferred development strategy and it may not identify the most sustainable sites for allocation, particularly in the context of the rural area.	Noted.
	Pigeons' primary concern is that the distances used to appraise the sustainability of the site are more suited to a dense urban context as opposed to the predominantly rural nature of Babergh and Mid Suffolk. Given the nature of the housing allocations we believe that the IHT guidance used as the basis for the assessment should be amended to reflect the rural nature of the assessment areas. Furthermore (and as highlighted by our representations above) the SA Scoping Report recognises the rural nature of the district (paragraphs 1.6 and 3.17) but also states that in order to boost housing and sustainable economic growth, allocations should promote access to sustainable modes of transportation (such as train and bus) to facilitate more sustainable modes of travel to work as well as enhance the vitality and sustainability of the rural areas. This is a key facet of the Regulation 18 Preferred Options Local Plan which seeks to direct growth along the A14 and A12 transportation corridors which include good train links into Ipswich, providing a sustainable means of accessing higher order services. Yet this is not adequately reflected in the SA Assessment Criteria.	As set out in the SA Scoping Report, there are a number of pieces of research that give a variety of recommended guidance distances for walking. 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. The IHT guidance does not distinguish between urban and rural areas in terms of walking distances and, although other research is not definitive, it suggests that the distances that people walk to access services and facilities is not dissimilar in urban and rural areas. However, in rural areas, a higher proportion of people tend to use cars than other modes of transport for access. It should also be noted that rural areas tend to have higher proportions of people in older age groups than urban areas, which means that walking longer distances, may be less of an option. The SA Framework contains a SA Objective on sustainable transport (SA Objective 16): To encourage efficient patterns of movement and the use of sustainable methods of travel in

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		support of economic growth. This objective contains assessment criteria for proximity to railway stations, bus stops and cycle paths.
	SA Objective 2a and 2b: The desirable distance to primary and secondary schools should be increased from the current distance of 400m and 500m respectively to 2,000m to reflect the IHT guidance of the preferred maximum for commuting to schools. Given the rural nature of the district Pigeon believe a distance of 2km to be entirely appropriate to provide residents with a strong option of walking or cycling to school and should be scored as a major positive if the site is within this distance.	As set out in the SA Scoping Report, there are a number of pieces of research that give a variety of recommended guidance distances for walking. The IHT guidance does not distinguish between urban and rural areas in terms of walking distances, and, although other research is not definitive, it suggests that the distances that people walk to access services and facilities is not dissimilar in urban and rural areas. 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, based on IHT guidelines, which are reflected in the SA Site Assessment Criteria and Assumptions for BMSDC JLP. A major negative score is only recorded when a site is greater than 1.2km from a primary or middle school, and greater than 2km from a secondary school. The closer to the primary and middle or secondary school the more positive the effect. This will enable sites to have their comparative performance to be appraised and distinguished.
	SA Objective 3b: Given the rural nature of the two districts we believe that a distance of less than 200m to a local centre is unreasonable and more suited to an urban context. Pigeon believe it entirely reasonable and sustainable for a resident to work up to 1200m to access shops and services and therefore recommend that this distance is changed to be a major positive(++). The assessment should also clarify that local centres include local village centres within the Core Villages to reflect the local rural context and the importance of such settlements in meeting service provision for their surrounding rural hinterlands.	As set out in the footnote against SA Objective 3 (3b), GIS data are not currently available for local and neighbourhood centres. Therefore, it is only possible to rely on defined town and district centres. The town and district centres are set out in the BMSDC Settlement Hierarchy and are as follows: ■ Town centres: – Sudbury – Hadleigh – Stowmarket ■ District centres: – Eye – Needham Market – Debenham² It should be noted that there are a number of other site assessment criteria that are based on walking distances to services and facilities. Given the lack of more localised information it was decided that the proposed settlement hierarchy provides a reasonably robust proxy for that distinguishes between those settlements that have the services and facilities that might be expected to be present in town, district, local

² Debenham is a district centre from a retail perspective, but in the settlement hierarchy it does not contain the same levels of services, facilities and employment opportunities as a Market Town/Urban Area and is therefore classified as a Core Village.

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		and neighbourhood centres. This categorisation has therefore been used to populate scores for criterion 3b.
	SA Objective 15: Given the rural nature of the two districts it is considered that this criteria should be amended to reflect the ability of developments to support the vitality and viability of local village centres in accordance with paragraph 78 of the NPPF.	There are a number of other site assessment criteria that are based on walking distances to services and facilities. Sites close to such services and facilities will score positively, irrespective of whether they are within towns or villages.
	SA Objective 16a: The current assessment awards a major positive (++) if a site is within up to 500m of a rail station which Pigeon believe is wholly inappropriate for a rural area and not in accordance with the spatial strategy or indeed the key sustainability issue of promoting travel by bus and train. Pigeon believe that a distance of 5km to a rail station would provide residents with a wholly sustainable option of walking, cycling or bus to access a train station for commuting to work. Any sites that are within 5km should be awarded a major positive score (++) . This is further reinforced when consideration is given to the preferred spatial strategy which is to locate dwellings where residents can access one of the most sustainable forms of travel (train) for commuting and leisure (e.g. within the A12 and A14 transportation corridors with their associated train lines into Ipswich). The current assessment might reject a site that is within walking or cycling distance of a train station and which would align with the preferred spatial strategy – such an approach is not considered sound.	As set out in the SA Scoping Report, there are a number of pieces of research that give a variety of recommended guidance distances for walking. 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, based on IHT guidelines, which are reflected in the SA Site Assessment Criteria and Assumptions for BMSDC JLP. Distances such as 5km to a rail station will encourage car use to access the rail station, rather than walking, notwithstanding the options to cycle and use buses. It is reasonable to score a site that is less than 1km from a rail station more positively than one that is nearer to 5km from a rail station, as the latter is more likely to generate a car journey.
	SA Objective 16b: Pigeon believe that that the distance of 200m to a bus stop to record a major positive is also inappropriate for a rural site and recommend that this be amended to the IHT guidance of 800m (preferred maximum) for a major positive effect. Furthermore, Pigeon note that the assessment does not allow the ability to recognise any mitigation or enhancement in the form of services and facilities that might be located within any new development or for the benefit of the wider area. Pigeon believe that in order for the Site Assessment Framework to be sound and in accordance with national policy, specifically Paragraphs 84 and 103 of the NPPF, not only should the site assessment criteria be amended to reflect the rural nature of the district but that the appraisals should also recognise the provision of mitigation such as schools, enhanced sustainable transport options and other strategic infrastructure, which is fully supported by national policy as a means of improving the sustainability of a rural site.	As set out in the SA Scoping Report, there are a number of pieces of research that give a variety of recommended guidance distances for walking. 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, based on IHT guidelines, which are reflected in the SA Site Assessment Criteria and Assumptions for BMSDC JLP. With respect to walking distance to bus stops, research has been undertaken that suggests the distances used by the IHT may be too short³. It found that the average walking distance to a bus stop in rural areas is 610m and the 85th percentile is 1,000m. We have used this research to amend the distances for criterion to bring them closer to, if not precisely in line with, the recommendations of the consultee. With regard to mitigation, the SA of all reasonable sites is on a 'policy off' basis, but possible mitigation measures are described for each SA Objective (see Chapter 6 (Sustainability Appraisal of Reasonable Alternative Sites) of the main SA Report).

³ How far do people walk? Gareth Wakenshaw BSc (Hons), PGDip, MCIHT WYG Group Dr Nick Bunn BSc (Hons), MSc, PhD, MCIHT, CMILT WYG Group Presented at the PTRC Transport Practitioners' Meeting London, July 2015

Respondent	Representation	Response
	Employment Sites Pigeon note that the same appraisal matrix will be applied to both prospective residential and employment site allocations. Given the SA Scoping Report has recognised the need to boost economic growth through the allocation of more employment land in rural areas, Pigeon believe that, under the current methodology, employment sites may be considered unsustainable if they are not within walking distance of a primary school. Such a requirement is clearly not relevant for an employment allocation. In order to ensure the selection of the most sustainable employment sites, Pigeon believe that the following SA Objectives should be removed as part of their assessment: ■ SA Objective 1a: GP surgeries ■ SA Objective 2a: Primary and middle schools ■ SA Objective 2b: Secondary schools ■ SA Objective 2c: Further and higher education facilities ■ SA Objective 4a: Housing provision ■ SA Objective 4b: Barriers to housing and services Pigeon recommend the following steps are implemented: ■ Amendment of the SA Framework to recognise the rural nature of the district and the differences between employment and residential sites; and ■ Incorporation of a second stage assessment to recognise the provision of mitigation and enhancements to recognise that some site proposals will be able to incorporate measures that mitigate impacts and / or enhancement measures.	Although the SA Framework was applied to both residential and employment sites, some of the site assessment criteria and assumptions differed because some of the criteria were considered not to be relevant as identified by the consultee. For example, proximity to schools was not taken into consideration in appraising the employment sites.
Serenity Parks	The response below should be read in the context that Serenity Parks support the content proposed in the scoping of the SA but are advancing views where revisions could be made to ensure that the development goals sought by the Council can be delivered without impediment. Serenity Parks support the publication of the SA scoping, and the Council's commitment to meeting Section 19 of the 2004 Planning and Compulsory Purchase Act. The Council should ensure that the results of the SA process conducted through the Joint Local Plan clearly justify any policy choices that are ultimately made, including the proposed site allocations (or any decision not to allocate sites) when considered against 'all reasonable alternatives'.	Noted. The SA Report includes the reasons why BMSDC has selected the JLP as preferred (See Chapter 7 (Sustainability Appraisal Findings for the Joint Local Plan) of the main SA Report), including decisions on individual sites (see Appendix G (Reasons for Selecting or Rejecting Site Options) of this SA Report).

Respondent	Representation	Response
Greg Shaw on behalf of Endurance Estates Strategic Land Ltd.	Endurance Estates Strategic Land Ltd previously submitted representations to the Issues and Options Joint Local Plan consultation with regard to Land East of Eastern Way and North of Wetherden Road, Elsmwell. In respect of this current consultation, our client wishes to highlight their previously submitted representations to the Issues and Options Local Plan consultation which highlighted deficiencies in the Sustainability Appraisal document which was published as part of that consultation. We trust these comments will be taken into account and positively addressed by LUC when preparing the Sustainability Appraisal (SA). It is of vital importance that all potential development sites for residential development, in sustainable settlements, are subject to SA. This will make for a transparent and robust process; and also aid the Council in identifying land to meet their minimum housing requirements. A selective SA process which only assesses the sites the Council wishes to allocate in the Local Plan is not robust. In addition to appraising specific sites, the SA needs to be robust in respect of assessing different growth strategies; with particularly focus and positive recognition given to sustainable settlements which possess a range of services and public transport links which are capable of supporting the day to day needs of the local community. These settlements should be a focus for growth in the next plan period.	LUC has been tasked with building on and developing existing SA work for the remaining stages of the JLP preparation process. All site options and policies have been re-appraised in this SA Report.
Southolt Parish Council	1. It seems clear that the full impact of the Cranswick chicken processing plant on Eye Airfield has still not been fully grasped. There can be no doubt that the increase and range of traffic occasioned by the plant will imping upon the transport system of high Suffolk with detrimental effect on both major roads and, in particular, the network of narrow country lanes of this district. The effects of the supply chain is grossly underestimated. 2. The proliferation and concentration of intensive broiler production sites in the district is a threat to the health and wellbeing of all residents.	The role of the SA Scoping Report is to review plans, policies and programmes relevant to the Local Plan, summarise the existing baseline with regards to sustainability topics, identify key strategic issues for the Districts and set out the SA Framework to use in future assessments. However, it is clear from a number of consultees' comments that there is a lot of concern regarding HGV movements in rural locations, particularly around Eye and Stradbroke. These issues have more of a bearing on the Local Transport Plan and management of the road network than proposals in the JLP, but the issue has been acknowledged in the SA (see the baseline section of 'Transport, Air Quality and Noise' in Appendix B (Policy Review and Baseline Information) of this SA Report).
Stradbroke Community Land Trust	The SCLT key issue is whether the SA scoping is robust enough to enable the Local Plan to measure the cumulative impact on Stradbroke of future and present potential commercial rural development. Much of that development consists of breeding broiler chickens for slaughter in Eye. If the transport route is not properly appraised and there is a growth of large scale broiler production on low value land areas in MSDC, their transportation and attendant removal of waste, and servicing the sites will largely take place through Stradbroke and specifically along Queen Street B1118, where the primary school is located.	The role of the SA Scoping Report is to review plans, policies and programmes relevant to the Local Plan, summarise the existing baseline with regards to sustainability topics, identify key strategic issues for the Districts and set out the SA Framework to use in future assessments. However, it is clear from a number of consultees' comments that there is a lot of concern regarding HGV movements in rural locations, particularly around Eye and Stradbroke. These issues have more of a bearing on the Local Transport Plan and management of the road network than proposals in the JLP, but the issue has been acknowledged in the SA (see the

Respondent	Representation	Response
	Transport appraisal scoping is not robust enough to enable proper scrutiny of the impact of specific development types on social and housing/health matters in Stradbroke. The village Plan aims for scale growth and makes primary school development a priority goal. Both these objectives are placed at serious risk by uncontrolled development and lack of proper scrutiny. The SA is not effective as it does not question the impact of economic development on the village's policy allocations and Plan objectives. In conclusion, We believe the SA should be widened in scope to consider the social and environmental impacts on Mid Suffolk as a whole, and not simply Stradbroke. In simple terms for the village it is either agriculture and lorries or significant sustainable communities. The B1118 is likely to become unsustainable for through traffic in the next few years. However, this has not been modelled and this is what we are asking for in the WSP transport modelling before the policies can be considered to be sound, or appropriate avoidance, mitigation or compensation solutions are facilitated through the Plan examination process.	baseline section of 'Transport, Air Quality and Noise' in Appendix B (Policy Review and Baseline Information) of this SA Report).
Stradbroke Parish Council	SA Scoping is not effective. It does not take account of the SOCG signed in January 2020: Strategic matters being addressed: this includes identification of cumulative/cross border infrastructure requirements resulting from planned growth, and mitigation measures, including modal shift.	Chapter 3 (Sustainability Context for Development in Babergh and Mid Suffolk) in this main SA Report describes the relationship of the JLP with other plans and programmes, including other plans that will form part of the development plan, in addition to the current status of other plans and programmes. Chapter 7 (Sustainability Appraisal Findings for the Joint Local Plan) includes an assessment of the cumulative effects of the JLP with other plans and projects.
	SPC submits evidence to support the foreseeable adverse cumulative impact of increased heavy lorry traffic on the objectives and policies of its made Neighbourhood Plan. There is no scoping of this issue, nor mitigation for B1118 Stradbroke. The SA is ineffective to appraise the social and environmental effects of the Local Plan on Stradbroke.	The role of the SA Scoping Report is to review plans, policies and programmes relevant to the Local Plan, summarise the existing baseline with regards to sustainability topics, identify key strategic issues for the Districts and set out the SA Framework to use in future assessments. However, it is clear from a number of consultees' comments that there is a lot of concern regarding HGV movements in rural locations, particularly around Eye and Stradbroke. These issues have more of a bearing on the Local Transport Plan and management of the road network than proposals in the JLP, but the issue has been acknowledged in the SA (see the baseline section of 'Transport, Air Quality and Noise' in Appendix B (Policy Review and Baseline Information) of this SA Report).
Strutt & Parker on behalf of Vistry Group (Bovis Homes Linden Homes and Vistry Partnership)	Representation written in connection with land at Bitcher's Lane, Boxford, Suffolk. Paragraph 11.10 states that assessment criteria and assumptions are subject to change following feedback during this consultation from the three statutory consultation bodies (Environment Agency, Historic England and Natural England). However, it is also important that the feedback/comments on the Sustainability Appraisal from landowners, developers and key stakeholders are also taken into consideration as this will provide a more holistic review. Paragraph 11.19 states that it may be necessary to refine the criteria and assumptions during the course of the Sustainability Appraisal work to ensure they respect the evidence base. This	Noted.

Respondent	Representation	Response
	is important in order to ensure the latest information is used to consider site. However, it is important that any changes are consistently applied. It is important for the plan making process that the latest evidence base is used to assess housing need and the suitability of sites. Boxford is identified as a sustainable location and is of the villages where sustainable future housing growth should be focused. The approach to use 'policy-off' appraisal to determine how sites perform on their merits without intervention is a fair starting point. The site at land at Butchers Lane, Boxford would perform well, as it is a sustainable site for development which offers every essential and public transport links to Sudbury and Ipswich.	
	Paragraph 12.8 sets out the spatial strategy options that will be subject to the Sustainability Appraisal at this stage. This consists of nine options from focusing development in the Ipswich fringe (1) to focusing development at the least environmentally constrained areas (9). Option 3 is to focus development at the Core Village. This is supported as Boxford is designated as a Core Village.	Noted.
	The site assessment criteria and assumptions focus on using walking distances as the only parameter to judge a positive or negative effects of a site. Whilst it is accepted that walking is the most sustainable form of travel, there are other modes such as cycling which are equally as sustainable and convenient, particularly if needing to carry items. It would therefore be useful to also show the cycling distances particularly in rural villages where pavements/footpaths are not always available, and where reasonable distances can be covered relatively quickly. Nevertheless, the walking distances in Table B.1 is acceptable in general.	It is accepted that cycling is a sustainable mode of transport and is also to be encouraged for health reasons. However, there is no agreed guidance on cycling distances, and the proportion of journeys made by cycle compared by foot is small. Research by the Chartered Institution of Highways and Transportation⁴ found that cycle use is more seasonal than for other modes, with up to twice as many cyclists in summer compared with winter. The majority of cycling trips are for short distances, with 80% being less than five miles and with 40% being less than two miles. However, the majority of trips by all modes are also short distances (67% are less than five miles, and 38% are less than two miles). Therefore, we are of the view that walking distances are also a good proxy for journeys that could switch to cycle, even though it may not capture longer cycle journeys.
	In terms of Table B.2, the list of destinations, are generally acceptable. However, again, in rural areas 'local centres' are not always in one location and can be spread out and the list should include public-houses and community centres/village halls which play a vital role in maintaining and supporting the local community. Land at Butchers Lane, Boxford would therefore present an available and developable site which would help meet local housing need but also provide an economic boost to the local businesses.	The assessment criteria have to use GIS data that is available and sufficiently accurate for the purposes of SA. There are some assets that could be included, but are not due to data limitations, but the overall GIS data being used is sufficient to identify effects and make comparisons.

⁴ Planning for Cycling, Rob Gallagher and John Parkin, October 2014, CIHT

Respondent	Representation	Response
Sudbury Area Green Belt Group	Table 1.1 states the SEA report will be produced at a later stage, it's not completely clear whether the consultation is one and the same; please make it clear that the Local Plan timetable will not mean the SEA coming after the Local Plan consultation.	SA/SEA is a systematic process that documents the 'story' of a plan. Therefore, it must be carried out during the preparation of the Local Plan. The SA Scoping Report is the first iteration of the SA. The SA Report will accompany and be published at the same time as the next draft of the JLP.
	Chapter 3 please point out that the Local Plan, to be meaningful, should contain the following: - a statement of what is necessary to get some building at a key site, Chilton Woods, eg waste disposal site and social housing, or whether the failed process of finding a developer will continue ad infinitum; - a statement that a site will be sought for a "garden city" of the right size for existing development needs, in order to relieve our present towns and villages from sprawling harmful developments, and not deferred until after a future Local Plan as is the current intention; - a statement of how the deficit of affordable housing for rent will be made up, without relying on an incremental process of achieving small fractions of such housing amongst much larger developments of mainly unaffordable houses; - a statement that the need for specialist housing eg sheltered will be provided for in the plans for large developments, so that it's not necessary at a later stage to convert open green land in towns to such uses.	It is not the role of SA to determine what should and should not be included in a Local Plan – this is the decision of the Local Planning Authority, guided by national planning policy, the evidence base, the findings of appraisal tools such as SA, and public consultation. SA is an assessment process designed to consider and report upon the significant sustainability issues and effects of implementing a plan. The SA Framework comprises a set of 16 SA Objectives, each of which is accompanied by a series of guide questions that have been used to appraise the JLP. The Framework contains a SA Objective on housing provision, which includes affordable and specialist housing provision (SA Objective 4), as well as a SA Objective on waste (SA Objective 8). The SA Report contains an appraisal of spatial strategy options, which look at where the focus of development could be over the plan period, taking into account the role and function of settlements, existing and proposed infrastructure, and the relationship with key settlements in neighbouring districts.
	Paragraph 5.37 Cross Street comments fail to add that removing parking has resulted in lorries speeding, and that a speed control or wider pavement should also be provided for the safety of pedestrians including children going to and from St Gregory's School, where recently a bollard was flattened.	The 'baseline information' in the SA Scoping Report refers to the overall environmental, economic and social characteristics of both Districts, and provides the basis against which the likely effects of alternative proposals in the JLP are appraised. The information provided by the respondent is considered too specific to be included in the baseline information at the strategic level.
	Table 7.2 needs to make a stronger reference to surface water flooding and springs, since CS15 only requires remedial actions, and fails to advise on actually avoiding development in surface water risk areas, or building on valley-sides that are prone to springs; development pressures should not result, as is happening on the south edges of Sudbury area, in a sprawl of houses on valley floors and sides that have gardens severely flooded for months on end, but for which the authorities are unable to decide the precise cause. It must at least be clear that planning will be governed by the NPPF 157 et seq.	Reference to surface water flooding has been made in the main SA Report as recorded in the Strategic Flood Risk Assessment. The purpose of Table 7.2 (now part of Table 3.1 in the main SA Report) is to identify the likely evolution of key sustainability issues in both Districts without the JLP, and what the JLP can do in responding to the key sustainability issues identified. Reference to Policy CS15 in Babergh's Core Strategy is included because without the JLP, the District would be reliant on this policy with regard to flooding. As set out in the table, 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.

Respondent	Representation	Response
		The SA Framework outlined in Table 11.1 has been used to appraise the JLP. The Framework contains SA Objective 10 that addresses flooding, including the guide question 'Will it reduce the risk of damage to people and property from extreme weather events?'
	Paragraph 8.16 makes just passing reference to producing a map of wildlife networks, as if to overlook that this is a firm requirement of the NPPF paras 171 and 174, which have more details than are implied here. It needs to be clear that Babergh-Mid can't delay any more in putting the NPPF into effect, and must not wait the 2 years or more that Babergh's partners will require to create a framework for assessing sites (followed by some much longer period of actually creating a map), but must rapidly publish a preliminary definition of wildlife corridors and stepping stones, that can be referenced when planning decisions are made. This definition must precede and inform all Land Allocation assessments or re-assessments, and it must particularly acknowledging that some of the greatest densities of wildlife are in urban fringe areas. It surely should reference the work being done nationally (eg in the Government's Natural Environment Guidance 2016, and by the Wildlife Trusts "Towards a Wilder Britain - creating a Nature Recovery Network to bring back wildlife to every neighbourhood"). There must be an end to SHELAA assessments etc that don't make a requirement of assessing biodiversity, landscape and open space impacts, which can result in officers' reports on planning applications, that don't cover such issues; and a reliance on ecologists' reports that normally don't set out to identify habitat types or connectivity. Table 8.1 reads well, but its detail perpetuates the prevailing temptation on local government to follow an expedient, unambitious course, doing the least that's required, eg relying on tree-planting, manicured play areas, sowing short-lived flowers, nesting boxes that won't be inhabited, etc.	Priority habitats as well as designated biodiversity sites are already included in the site assessment criteria in Appendix B of the SA Scoping Report. The purpose of Table 8.1 (now part of Table 3.1 in the main SA Report) is to identify the likely evolution of key sustainability issues in both Districts without the JLP, and what the JLP can do in responding to the key sustainability issues identified. The table states that the JLP provides an opportunity for new development to come forward at the most appropriate locations in order to avoid detrimental impacts on biodiversity assets, as well as up to date planning policy in relation to future policy direction such as biodiversity net gain. Additionally, the JLP provides an opportunity to improve the overall ecological network.
	Chapters 9 and 10 need to raise the bar. It might be hard to find instances where historic environment or landscape have determined a planning outcome. Even where this is so, in the case of St Bartholomew's Priory at Sudbury, tree-screening between it and the proposed Chilton Woods development is being proposed as a solution, disregarding whether the view to the west from Chilton Woods would be blocked. In the case of Land Allocation LA042, Tye Farm Great Cornard, the rather ridiculous decision is that restricting building to below the 70 metre contour, will protect the view from the east (which is relatively unimportant), while overlooking the important view from the west, ie the town, by covering the hillside up to the skyline! In some cases it has taken an inspector to identify an over-riding landscape issue, as at Prospect Hill, Great Cornard. The settings of Abbas Hall at Great Cornard, of Chilton Church near Sudbury, are notorious examples of over-intrusive development. Tree-planting as a remedy should be warned against, as it can spoil views and destroy open habitats, and the Inspector's comments in APP/D3505/W/19/3230839 need to be referenced: "planting cannot be relied upon to provide a solid and permanent buffer to views. This is because it is ever evolving, is reliant on regular maintenance to retain a consistent form and may be reduced in scale or extent in the future". Table B3.13 "Landscape Sensitivity" is welcome, and should be required to be applied at Land Allocation stage.	SA in an assessment process designed to consider and report upon the significant sustainability issues and effects of a plan. Chapters 9 and 10 (now sections 'Historic Environment' and 'Landscape' in Appendix B (Policy Review and Baseline information) in this SA Report) provide a list of relevant plans, policies and programmes, in addition to the baseline information. The baseline information refers to the overall environmental, economic and social characteristics of both Districts, and provides a basis against which to assess the likely effects of alternative proposals in the JLP. The SA Framework comprises a set of 16 SA Objectives, each of which is accompanied by a series of guide questions that have been used to appraise the JLP. The Framework contains a SA Objective on the historic environment (SA Objective 12). A Heritage Impact Assessment undertaken by LUC has informed the appraisals against this objective. The SA Framework also contains a SA Objective on landscape (SA Objective 13). A Landscape Sensitivity Assessment undertaken by LUC has informed the appraisals against this objective.

Respondent	Representation	Response
	Chapter 11: Since land allocations are made from desk-top information, I ask for a recommendation of public consultation, since local information might at least help in avoiding factual errors. For instance, it can't be right that the assessment for Land Allocation LA042, on the steep hillside at Tye Farm Great Cornard, states that there's no risk of surface water flooding; such slopes are notorious for springs and for rapid run-off, and the official investigation of severe surface-water flooding on and below the adjacent land (including on a development site under construction) still has not been able to identify the cause.	LUC has been tasked with building on and developing existing SA work for the remaining stages of the JLP preparation process. All site options and policies have been re-appraised in the next stage of the SA. The SA has appraised the site options using GIS-based information. The Strategic Flood Risk Assessment (SFRA) will address the risk of flooding, the findings of which have been reported in this SA Report.
	The decision in paragraph 12.13 is welcome, re-appraisal of Land Allocations. However there's no requirement to address three serious shortcomings. First, the process of ranking sites ("allocating land with the least environmental or amenity value"), cannot be rational unless a statement is also published on why Chilton Woods - which appears to be the most suitable of the LA sites at Sudbury - has still not attracted to developers, and what will be necessary to ensure some building there - since there has been no such problem with the comparable site at Moreton Hall in West Suffolk. Second, there is no statement that public consultation is a necessary part of making land allocations; also no explicit requirement to complete the Land Allocation re-appraisals before the next Local Plan consultation. Third, it has been very frustrating to see land allocations made without any adequate reference to biodiversity, or potential wildlife corridors, or landscape, or open space; the Local Plan needs an explicit commitment to meet para 171 of the NPPF, and government intentions to create a Nature Recovery Network through its Environment Bill etc; the Local Plan should require that all planning decisions, and Land Allocation documents, will include an environmental requirement, to assess habitat types, value as a wildlife corridor or stepping-stone, and value as amenity or open space.	SA must be carried out during the preparation of the Local Plan. All site allocations have been re-appraised in this SA Report, which is being consulted on by members of the public. The SA Framework contains a SA Objective on biodiversity (SA Objective 11). Therefore, all site options have been appraised in relation to biodiversity. There is also an objective for landscape (SA objective 13), the appraisals of which have been informed by a Landscape Sensitivity Assessment undertaken by LUC. Open space is considered under SA Objective 1. The SA has identified the likely effects of developing a site insofar as it is possible at the strategic level, which has enabled comparative performance of sites against the SA objectives to be considered by BMSDC. SA is only one factor that influences the decision-making process. Other factors include the results of public consultation, deliverability and conformity with national policy which have also been taken into account by BMSDC when selecting preferred options for the plan.
	Chapter 13 on Consultation hints at the current considerable non-engagement of Natural England in planning matters, which is due to their dwindling staffing and funding. Please propose that urgent action on this is sought, for instance the district councils could be advised to reach an arrangement with Natural England. For instance, the Suffolk Wildlife Trust or the Dedham Vale and Stour Valley Project might help fund a post at Natural England, as part of their own efforts to enhance good planning (eg under the Glover Review and the Colchester Declaration).	Each iteration of the SA has been consulted upon by Natural England. Natural England responded to the consultation request on the SA Scoping Report.
	In Appendix A 3.3.7 "Biodiversity", ACU gives an inadequate response when it refers back to Chapter 8 on the topic of a need for a network of high quality habitats, and that existing and new habitats should be connected. In Chapter 8, the reference in 8.7 risks being a token one, as no further mention is made of how it might be achieved; the remainder of Chapter 8, and the content of the Local Plan Preferred Options, show that the district councils are complacent and uninformed, relying on the status quo of the existing SSSIs and other designated sites, and actions like tree-planting; when reading items about "protecting natural habitats" as in 8.16,	SA in an assessment process designed to consider and report upon the significant sustainability issues and effects of a plan. All site options and policies have been re-appraised in this SA Report.

Appendix A

Consultation Comments

Babergh Mid Suffolk Joint Local Plan: Main Modifications
February 2023

Respondent	Representation	Response
	experience is this will mean only a token set of locations, rather than requiring adequate consideration or even assessment, of the habitats that are actually likely to be built on.	The section 'Biodiversity' in Appendix B (Policy Review and Baseline Information) of this SA Report provides a list of relevant plans, policies and programmes, and baseline information, relating to biodiversity. The SA Framework comprises a set of 16 SA Objectives, each of which is accompanied by a series of guide questions that have been used to appraise the JLP. The Framework contains a SA Objective on biodiversity (SA Objective 11): To conserve and enhance biodiversity and geodiversity.
	There is a glaring defect in the assumptions re walking distances in Appendix B, Tables B2 and B3.1. There is a glaring omission in the latest draft of the Local Plan, as the Natural England Accessible Natural Greenspace Standards have been included minus the standard for walking distance to open space (the standard is 2 hectares within 300 metres), even though the Plan's Open Space Study admits there is a deficit of open space in town areas. B2 fails to address this properly, by recommending a distance much more than 300 metres, ie 4 - 800 metres, and surely unless justification is quoted for any change from Natural England's ANGSt standards, the recommendation must emphatically be changed to a max of 300 - 500 metres, together with a recommendation to enhance the naturalness of open space required by the standards (the Queens Pit open space in Sudbury exemplifies a good minimum standard).	As set out in the SA Scoping Report, there are a number of pieces of research that give a variety of recommended guidance distances for walking. 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, based on IHT guidelines, which are reflected in the SA Site Assessment Criteria and Assumptions for BMSDC JLP. However, in recognition of Natural England's ANGSt standards, the minimum distance has been reduced from 400m to 300m.
	The infrequency with which Babergh-Mid Suffolk receives useful or decisive environmental advice from its consultees (and has no ecological advice in-house), needs to be highlighted in this report. There have been consultation replies which merely state that the developer's ecologist is "reputable"; in most cases the consultee has not even arranged the briefest visit, even to sites adjoining a country park, or where there is Priority Habitat, or sought biodiversity records eg from the BTO and the SBIS; or requested information from a local recorder, or been able to produce any record of site assessments for CWSs, LNRs, Country Parks etc. Appendix B, Table B3, though welcome, provides an example of where recommendations for "mitigation" could become a token "bog-standard" matter of tick-box and cut-and-paste. This report fails to identify the real risk, especially at Land Allocation or Outline Planning stage, of a local authority "rubber-stamping" reports from developers that look glossy and appear to "tick the boxes" since in practice, awareness and understanding within Suffolk's local authorities is notably severely uninformed; and it must be acknowledged that by consigning substantial environmental proposals to the Reserved Matters stage, the likelihood is remote of any being adopted.	SA in an independent and objective assessment process designed to consider and report upon the significant sustainability issues and effects of a plan. This comment does not indicate the need for any change to the findings of the SA Scoping Report insofar as it relates to a strategic appraisal of Local Plan policies and proposals.
Suffolk AONB Team	1. Whether there are any additional plans, policies or programmes that are relevant to the SA that should be included. Chapter 2 – Nationally Significant Infrastructure Projects	Included as requested.

Respondent	Representation	Response
	The SA includes a reference to the Sizewell C NSIP. It makes no reference to the East Anglia ONE North or the East Anglia TWO offshore NSIPS which will also come ashore on the Suffolk Coast. Development Consent applications have been submitted for both these projects. The Inquiries that were scheduled to start in March 2020 have been delayed due to Covid-19. These NSIPS should be referenced in the SA report. Also the Bramford-Twinstead NSIP may well need to be revived due the NSIPS listed above therefore this NSIP should also be referenced in the SA.	
	2. Whether the baseline information provided is robust and comprehensive and provides a suitable baseline for the SA of the JLP. Chapter 6 – Land & Water A Green Future: Our 25 Year Plan to Improve the Environment should be added under the national policy documents in this chapter. The Anglian River Basin District River Basin Management Plan should be listed as a sub-national policy document in this chapter.	Included as requested.
	Chapter 10 – Landscape The Planning Practice Guidance was updated in 2019 regarding Landscape. How should development within the setting of National Parks, the Broads and Areas of Outstanding Natural Beauty be dealt with? Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account. Paragraph: 042 Reference ID: 8-042-20190721 The SA should be altered to include a ref to the PPG under the national policy section in this chapter. Under the sub national section of chapter 10 reference should be included to the i) Stour Valley Project Area Valued Landscape Report ii) Suffolk Coast & Heaths Additional Project Area Valued Landscape Report – see attached documents	The relevant parts of the SA have been updated as requested. On 7 July 2020, the Secretary of State confirmed Natural England's legal Order to designate three extensions to the Suffolk Coast and Heaths AONB. Figure B.21 (Nationally Designated Landscapes) shows the Suffolk Coast and Heaths AONB, including the newly designated extension.

Respondent	Representation	Response
	Figure 10.2 should be amended to show the boundary of the proposed Suffolk Coast & Heaths AONB extension area.	
	3. Whether there are any additional key sustainability issues relevant to the plan area that should be included. All the key sustainability issues have been identified.	Noted.
	4. Whether the SA framework (Chapter 11) is appropriate and includes a suitable set of SA Objectives. The AONB team welcomes the changes that have been made to the Guide questions in the SA Framework under objective 13.1 This should be further amended to ensure that any impacts from proposed policy or site allocations within the setting to the AONB are also properly considered at the plan making stage. Guide question 13.1 should be amended to read 'Will it conserve and enhance the AONB and its setting?' This adds consistency to the proposed SA methodology as impacts on the heritage settings are referenced. A new guide question should be added to SA objective 13 as follows: Will it protect and enhance Valued Landscapes? This is now required by para 170a of the 2019 NPPF.	Guide question 31.1 has been amended as requested to include the setting of the AONBs. A new guide question regarding 'valued landscapes' has been included.
	5. Whether the criteria and assumptions for appraising potential site allocations (Appendix B) are appropriate for this stage of the SA process, and a suitable refinement on those used to date. The criteria for appraising impacts on landscape, particularly on AONBs is not appropriate or robust enough. In Appendix B, SA Objectives 11 & 12 for Biodiversity and Heritage (respectively) both identify nationally important biodiversity and heritage assets as criteria for appraising potential site allocations. SA objective 13 uses landscape sensitivity as a criteria for appraisal. It does not make any reference to nationally designated landscapes. The proposed appraisal approach is therefore considered inconsistent in terms of nationally important assets be they biodiversity, heritage or landscape. The criteria used to appraise landscape should be amended for consistency with the criteria used to appraise impacts on nationally designated biodiversity and heritage assets Criteria 13a in Table 3B should be changed to read Nationally designated landscapes & landscape sensitivity. This change is necessary to also ensure that impacts on the Dedham Vale and Suffolk Coast & Heaths AONB. It is also not clear how the impact of any proposed site allocations within the extension area to the Suffolk Coast & Heaths AONB will be assessed under the approach proposed. Natural England has made a Variation Order which is now with the Secretary of State for sign off. It is Natural England's expectation that the area subject to an AONB Variation Order will	LUC has been commissioned by BMSDC to undertake a Landscape Sensitivity Assessment. The results of this assessment have informed the appraisal of sites against criterion 13a. A new criterion 13b has been added to the site assessment framework that identifies whether the site is within, or within 1km of, an AONB or an AONB extensions.

Respondent	Representation	Response
	carry significant weight in the plan making process as the AONB Variation Order process has reached an advanced stage. The justification for this approach is that the area has been assessed as meeting the requirements for national designation. Further consideration needs to be given to how the AONB extension area will be considered in the next stages of the SA process	
	6. Whether the overall spatial strategy options (Chapter 12) represent a suitable and reasonable set of alternatives, and that no other clearly distinguishable spatial strategy options should be added. The spatial strategies to be assessed represent a suitable and reasonable set of alternatives.	Noted.
Suffolk County Council	JOINT LOCAL PLAN PROCESS It is recommended that in the section "Relationship of the JLP to Other Plans and Programmes" that the joint working through the Ipswich Strategic Planning Area (ISPA) is included. The SA should include objectives relating to how the Joint Local Plan is contributing to addressing cross boundary issues. The specifics of these issues will be highlighted in the relevant sections of this response.	The SA has been updated to reference the joint working.
	POPULATION, HEALTH AND WELLBEING <i>Plans and Programmes</i> The plans and programmes listed in the report are appropriate. As is correctly highlighted health is a cross cutting area and so will be relevant the plans and programmes of a number of sections in the report, such as Transport, Air Quality and Noise and Climate Change Adaptation and Mitigation.	Noted.
	<i>Baseline</i> Useful sources of information which should be included as part of the local context and baseline are the Public Health Suffolk Place Based Needs Assessment⁵, which provides insights on population health and needs at a more local level. It is welcome that the future baseline refers to the ageing population; another helpful document is the Suffolk 20+2⁶ which	Updates have been made to include the Suffolk Nature Strategy and Rights of Way Improvement Plan. Reference is now made to Special Educational Needs and Disability (SEND) in the policy context section. Neighbouring authorities have provided GIS data relating to schools.

⁵ <https://www.healthysuffolk.org.uk/jsna/pbna>

⁶ https://www.healthysuffolk.org.uk/uploads/SF1160_-_JSNA_State_of_Suffolk_Report_2019_20_Plus_v2.0.pdf

Respondent	Representation	Response
	examines the potential social, demographic, economic, health and deprivation issues in Suffolk in 20 years. With regards to access to open spaces and recreation, the Suffolk Nature Strategy³⁷ and the Rights of Way Improvements Plan⁴⁸ may be helpful. There is currently no reference in the baseline to Special Educational Needs and Disability (SEND). Information on the current availability of SEND support can be found on the SCC website⁹ and the Suffolk SEND Strategy¹⁰. Figure 3.1 could show secondary schools and post 16 education in neighbouring districts, as it is not uncommon for these pupils to cross authority boundaries.	
	<i>Key Sustainability Issues</i> No comment.	Noted.
	<i>Framework and Objectives</i> Objective 1 and guide questions are supported. A minor amendment is suggested to guide question 1.2, to include further details about healthy lifestyles. “(1.2) Will it encourage healthy lifestyles? E.g. opportunities to exercise and the availability of healthy food” Objective 3 makes reference to Lifetime Homes. As the Lifetime Homes standard is no longer in use, having been replaced by the M4(2) standard, it is recommended that guiding question 3.5 makes more general reference to “adaptable homes” instead.	With respect to guide question 1.2, it is considered that the other guide questions capture opportunities to exercise, and availability of healthy food is too specific and not governed by planning policy to be included. An amendment has been made to refer to ‘adaptable homes’ instead Lifetime Homes; in guide question 3.5.
	TRANSPORT, AIR QUALITY AND NOISE <i>Plans and Programmes</i> Inclusion of the Suffolk Local Transport Plan is welcome. It should be noted in paragraph 5.10 that this is in the process of being reviewed. The Scoping report should also include the Suffolk Rail Prospectus, which outlines a set of improvements to rail services in Suffolk, including services which travel through Stowmarket and improvements to stations. The baseline for rail should also include information provided in the Williams Review.	The SA Report has been updated to reflect these issues, where considered appropriate.

⁷ <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/suffolks-countryside-and-wildlife/Suffolks-Nature-Strategy-2015.pdf>

⁸ <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/green-access-strategy/>

⁹ <https://www.suffolk.gov.uk/children-families-and-learning/send-and-the-local-offer/an-overview-of-sen-support/>

¹⁰ <https://www.suffolk.gov.uk/children-families-and-learning/send-and-the-local-offer/send-strategy-2017-2020/>

Respondent	Representation	Response
	Reference should be made to the Road Investment Strategy 2 (RIS2) ¹¹ . While it does not highlight improvements on the strategic road network in the County over the next 5 years, it does highlight improvements to the Copdock Interchange as in the pipeline for RIS3, which will be within the lifetime of the plan.	
	Baseline With regards to the road network, capacity of the network is discussed within the districts (paragraphs 5.20 to 5.22), but no reference is made to cross boundary impacts resulting from growth in Babergh and Mid Suffolk. The plan evidence base (The WSP modelling referenced in the report) shows that cumulative growth within Ipswich and the surrounding districts will cause significant congestion issues and likely air quality issues. Figures 5.1 and 5.2 show that commuting out of the districts is high. The scoping report should recognise these cross boundary issues. Potential impacts on Bury St Edmunds also need to be recognised. The air quality section highlights Air Quality Management Areas (AQMAs) in Ipswich, however AQMAs in Bury St Edmunds should also be included¹². The baseline should include information on the cycle network within the districts. Babergh and Mid Suffolk have been in contact with SCC regarding information on cycle routes within the districts and this information should be included in the baseline. Similarly to how highways schemes are listed in paragraph 5.23, cycle improvements, such as the Elmswell to Woolpit cycle path, could be included. The PROW network could also be considered for transport purposes. Bridleways make up some of the cycle routes in the district and the network has the potential to link communities together, providing a sustainable transport option. Information on the PROW network can be found on the definitive maps¹³ and SCCs Right of Way Improvement Plan. The Lorry Route Network could also be included in the baseline¹⁴. This could help to identify if employment sites (which are more likely to generate new lorry traffic) are located in the best locations to access the Lorry Route Network.	The SA Report has been updated to reflect these issues, where considered appropriate.
	Key Sustainability Issues The report should include the cross boundary transport impacts on congestion and air quality and the need to achieve modal shift to address these issues. Without policies in the local plan it will be considerably more challenging to mitigate these impacts and deliver infrastructure to	The SA Report has been updated to reflect these issues, where considered appropriate.

¹¹ <https://www.gov.uk/government/publications/road-investment-strategy-2-ris2-2020-to-2025>

¹² https://uk-air.defra.gov.uk/aqma/details?aqma_ref=1754

¹³ <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/definitive-map-and-statement/>

¹⁴ <https://www.suffolk.gov.uk/assets/Roads-and-transport/lorry-management/Lorry-Route-Map-Amended-MAY-17.pdf>

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	achieve modal shift. Without modal shift there will be continued dependence private car, resulting in congestion, emission of greenhouse gasses, and exacerbated air quality issues. The report should also refer to the work being done by Ipswich Strategic Planning Area Authorities to achieve the modal shift required to mitigate these impacts. The ability to for development to enhance public transport provision is stated in the key Sustainability Issues, as is the rural nature of the district. This could be translated into a Guide Question for the Objectives in table 11.1.	
	<i>Framework and Objectives</i> Objective 16 needs to explicitly address the need for modal shift and enable, rather than “encourage” sustainable transport. It is recommended that this is reworded to “To enable efficient patterns of movement and maximising modal shift towards sustainable modes of transport in support of economic growth.” Guide question 16.1 could highlight the rural nature of the district through a minor amendment suggested below 16.2 Would it promote the use of sustainable travel modes and reduce dependence on the private car, <i>including enabling the provision or enhancement of public transport in rural areas?</i>	SA Objective 16 has been amended to “To enable efficient patterns of movement and modal shift towards sustainable modes of transport”. ‘Maximise’ has not been used due to the constraints on rural areas to achieve this, and it is difficult to measure whether something has been maximised or not. Guide question 16.3 has been amended as requested (respondent incorrectly referenced guide question 16.2).
	LAND AND WATER RESOURCES <i>Plans and Programmes</i> The Sub-National section should include reference to the Anglian Water’s Water Recycling Strategy - Water Recycling Long-Term Plan (Sept 2018)¹⁵. Reference to the Suffolk Minerals and Waste Local Plan is welcome. It should be noted that the currently adopted plans are the Waste Core Strategy and the Minerals Core Strategy and so should be referenced in the report, as part of the local policy context in paragraph 6.16.	The SA Report has been updated as requested.
	<i>Baseline</i> The baseline does not highlight that the districts are in a water stressed area, which is an important consideration in ensuring a sustainable supply of water¹⁶.	The SA Report has been updated as requested.
	<i>Key Sustainability Issues</i>	Noted.

¹⁵ <https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/water-recycling-long-term-plan/>

¹⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/244333/water-stressed-classification-2013.pdf

Respondent	Representation	Response
	No comment.	
	<i>Framework and Objectives</i> It is recommended that Objective 7 includes the guiding question “Will the proposals minimise the sterilisation of minerals resources.”	The suggested wording has replaced the guide question 7.5, which reads 'Will it promote sustainable use of minerals?'
	CLIMATE CHANGE MITIGATION AND ADAPTATION <i>Plans and Programmes</i> The national policy context should include the Environment Agency Flood & Coastal Erosion Management Strategy¹⁷, which is currently being revised. Please note that the latest version of the Suffolk Climate Action Plan is 2017. The Report should include reference to Local Energy East Strategy 2018.¹⁸	The SA Report has been updated to include reference to these documents.
	<i>Baseline</i> The baseline could include a more detailed breakdown of emissions sources, which could highlight more opportunities to reduce emissions	It is considered that the breakdown is sufficient for the purposes of SA.
	<i>Key Sustainability Issues</i> The key sustainability issues should include mention of planning for renewable energy capacity to meet the needs of current and future development, this will have to be delivered partially from within the districts both on roofs but also large scale solar PV and onshore wind. Key issues should also include the availability of suitable infrastructure for electric vehicle uptake.	We consider this issue to be covered by the first key sustainability issue identified in Table 7.2 (now part of Table 3.1 in the main SA Report) but have amended the wording to make this clearer.
	<i>Framework and Objectives</i> Given the national target of being net carbon neutral by 2050 and the local target of 2030, it is suggested that objective 9 is changed to “Contributes to delivering net zero carbon emissions”. One of the guide questions should also make reference to provision of infrastructure for electric vehicles, given the Government is considering changing the target of no new fossil fuel vehicles to 2035¹⁹. Guide Questions 10.1, 10.2 and 10.4 should also make reference to infrastructure (e.g. road, rail, energy transmission, telecommunications, etc...) as well as people and property.	The SA has been updated to reflect these issues, where considered appropriate. SA Objective 9 has not been amended as requested. This is because the net zero carbon is a national target deliverable by 2050, which is considerably beyond the plan period, and will be achieved by a range of national and local measures, many of which are not within the scope of the planning system. SA Objective 9 does, though, seek to appraise whether the JLP will reduce the contribution to climate change, which is in line with the 2050 objective for the country as a whole.

¹⁷ <https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england>

¹⁸ <https://www.energyhub.org.uk/wp-content/uploads/2019/09/LEE-Energy-Strategy.pdf>

¹⁹ <https://www.gov.uk/government/consultations/consulting-on-ending-the-sale-of-new-petrol-diesel-and-hybrid-cars-and-vans>

Respondent	Representation	Response
Suffolk Fire and Rescue Service	Suffolk Fire & Rescue Service has considered the plan and are of the opinion that, given the level of growth proposed, we do not envisage additional service provision will need to be made in order to mitigate the impact. However, this will be reconsidered if service conditions change. As always, SFRS would encourage the provision of automated fire suppression sprinkler systems in any new development as it not only affords enhanced life and property protection but if incorporated into the design/build stage it is extremely cost effective and efficient. SFRS will not have any objection with regard access, as long as access is in accordance with building regulation guidance. We will of course wish to have included adequate water supplies for firefighting, specific information as to the number and location can be obtained from our water officer via the normal consultation process.	Noted.
Suffolk Preservation Society	Chapter 9. Historic Environment. Policy Context - at a local level, Conservation Area Appraisals, Conservation Area Management Plans, Local Lists and historic environment assessments for Neighbourhood Plans should be added. Current Baseline - Heritage Assets paragraphs should also reference non-designated heritage assets. Although no district-wide local lists are held, lists exist or will be been made at a local level and within Neighbourhood Plans.	Conservation Area Appraisals, Local Lists and Historic Environment Assessments for Neighbourhood Plans are not considered to provide policy context, rather they provide assessment results. Therefore, they have not been added to the policy context. These documents do, however, inform the evidence base. Reference has already been made to the Conservation Area Appraisals in the baseline information section in Appendix B (Policy Review and Baseline Information) of this SA Report. Historic Environment Assessments for Neighbourhood Plans are considered too specific to add to the baseline information, which refers to the overall environmental, economic and social characteristics of both Districts. Reference to non-designated heritage assets has been added to this section and have also been taken into account in the Heritage Impact Assessment undertaken by LUC.
	Chapter 10. Landscape. Policy Context - at a local level, Landscape Character Assessments for Neighbourhood Plans should be added.	Landscape Character Assessments for Neighbourhood Plans are considered too specific to add to the baseline information, which refers to the overall environmental, economic and social characteristics of both districts. The SA has been informed by a Landscape Sensitivity Assessment undertaken by LUC.
Suffolk Wildlife Trust	Chapter 8: Biodiversity In 8.7 we wish to state that the NPPF (Section 174) goes further than just 'encouraging'. Plans should : a. 'Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation;	SA in an assessment process designed to consider and report upon the significant sustainability issues and effects of a plan. The respondent's comment relates more specifically to the Joint Local Plan. The SA Framework comprises a set of 16 SA Objectives, each of which is accompanied by a series of guide questions that have been used to appraise the JLP. The Framework contains a SA Objective on biodiversity (SA Objective 11): To conserve and enhance biodiversity and geodiversity. The information is not available to map key ecological networks. Figure B.16 displays designated biodiversity assets, whilst Figure B.17 displays the Ancient Woodland Inventory. The site assessment also includes priority habitats in the appraisal criteria.

Respondent	Representation	Response
	b. Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.' However, the Local Plan is not underpinned by a robust evidence base to be able to deliver this requirement of the NPPF. In the Babergh and Mid Suffolk Joint Local Plan – Preferred options (Regulation 18) Consultation – July 2019 no detail was provided of key ecological networks and consequently the ability to achieve the requirements of NPPF Section 174 b through existing and emerging policy is extremely limited. This shortfall is also demonstrated by the lack of any Figure in the SA relating to wider ecological networks.	
	The Site Assessment Criteria Table 11.1: SA Objective 11: To Conserve Biodiversity and Geodiversity should include the following questions: 'Will it ensure ecological networks are not compromised, and future improvements are not prejudiced?' 'Will it lead to measurable net gain for biodiversity?' 'Will it contribute positively to the wider Green Infrastructure networks?'	The first two requested guide questions have been added to the SA Framework to replace the following questions: (11.8) Will it lead to the creation of new habitat? (11.9) Does the proposal maintain or enhance biodiversity? The last requested guide question 'Will it contribute positively to the wider Green Infrastructure networks?' has not been included as it is considered that this is addressed by the other guide questions, including those suggested by the consultee.
Mr James Tanner on behalf of Roger Skinner Ltd.	Of concern to the current Skinner factory operation in Stradbroke is the impact of HGV movements through Stradbroke and in particular along Queen Street. The Scoping Report covers transport matters within Chapter 5 and it appears to us that the appraisal comprises a general transport network assessment. In our opinion more detail is required to analyse the District's specific lorry routes that are becoming increasingly more used, generating a considerable amount of HGV movements on a road network already under pressure. The introduction of the new Cranswick chicken processing factory at Eye, will see a rise in the number of chicken rearing facilities with Babergh & MSDC districts, generating further lorry movements far in excess of current levels. This could potentially be both in terms of poultry being delivered to the processing site and for waste being transported back, to anaerobic digestion plants, such as Barley Brigg. As Stradbroke is strategically situated along one of the main lorry routes providing access from the wider Suffolk area to A140 via the B1118, this has the potential to generate a high level of additional HGV movements along Queen Street, past the main entrance to the Skinners pet food manufacturing site. We are concerned that this additional traffic will impact on the current operation of the factory and also in any future expansion plans of the business, which ultimately could itself generate additional HGV movements. The majority of vehicular movies from the factory site only enter and exit from the north side of Queen Street but we would not	The role of the SA Scoping Report is to review plans, policies and programmes relevant to the Local Plan, summarise the existing baseline with regards to sustainability topics, identify key issues for the Borough and set out the SA Framework to use in future assessments. The SA Framework comprises a set of 16 SA Objectives, each of which is accompanied by a series of guide questions that have been used to appraise the JLP. The Framework contains a SA Objective on transport (SA Objective 16), specifically the use of sustainable methods of travel. However, it is clear from a number of consultees' comments that there is a lot of concern regarding HGV movements in rural locations, particularly around Eye and Stradbroke. These issues have more of a bearing on the Local Transport Plan and management of the road network than proposals in the JLP, but the issue has been acknowledged in the SA (see the baseline section of 'Transport, Air Quality and Noise' in Appendix B (Policy Review and Baseline Information) of this SA Report).

Respondent	Representation	Response
	want to see any future expansion jeopardised by the impact of accumulative vehicular movements on a road network which is already under pressure. The potential future effect of an expansion to the current milling business, has already been considered by the Stradbroke Neighbourhood Plan and any extra vehicular movements have been allowed for in the overall strategy. We therefore feel the Scoping Report must highlight the need for more analysis on the localised lorry routes, within the overall transport network assessment of the JLP's, Sustainability Appraisal.	
Transport for London	No comments.	Noted.
West Suffolk District Council	The SA framework looks complex but is not complete as mixed significant positive and significant negative effects is omitted. Also, it is not easily interpreted as it strays beyond the more recognised traffic light system of colour coding.	Mixed effects have been recorded if both the positive and minor criteria outlined in the Site Assessment Criteria and Assumptions (Table B.3) are met. As an example, and with regard to SA objective 16, if a site is located within 500m of a railway station (++) but 401-800m of a bus stop and a cycle way (-) then a mixed major positive and minor negative effect have been recorded. However, single 'significance scores' have been developed for each SA objective. The SA matrix guide (see Table 2.2 in the main SA Report) sets out the colour coding used for each effect, including mixed effects. These colours have been selected due to the fact they are colour blind friendly.
	The spatial strategy options would usually be set out in the local plan itself, rather than in the SA Scoping Report. They need to be reasonable alternatives and it may be worth giving further thought to whether option 4 is reasonable, as this may be challenging to deliver.	BMSDC is responsible for identifying reasonable alternatives, which are then subject to assessment through the SA. Spatial strategy option 4: Proportionate growth – all settlements increase in size in proportion to current population is frequently requested by Inspectors to be tested through the SA process and is included for completeness.
	Where necessary, please could the maps be amended to show West Suffolk Council boundary, rather than Forest Heath and St Edmundsbury (councils merged on 1 April 2019).	Amended as requested.
	Where necessary, please could text be amended to refer to West Suffolk, rather than St Edmundsbury (e.g. 5.32 and 5.33).	Amended as requested.
	Paragraph 2.44 West Suffolk's LDS was amended in February 2020 and the plan end date is now February 2024.	Amended as requested.

Appendix A

Consultation Comments

Babergh Mid Suffolk Joint Local Plan: Main Modifications
February 2023

Respondent	Representation	Response
	Paragraph 2.47 typo - Mildenhall Academy should read Mildenhall Academy.	Amended as requested.

Appendix B

Policy Review and Baseline Information

Population, Health and Wellbeing

Policy context

International

B.1 United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the 'Aarhus Convention') (1998)¹: Establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective.

B.2 United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002)²: Sets a broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.

National

B.3 National Planning Policy Framework (NPPF)³ sets out the following:

B.4 The NPPF (2021)⁴ includes as part of its social objective the promotion of “*strong, vibrant and healthy communities*” by:

- “*ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and*
- *by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural wellbeing.*”

B.5 Ultimately planning policies and planning decision making should “*aim to achieve healthy, inclusive and safe places*”.

B.6 The document states that strategic policies should set out the pattern, scale and quality of development and make sufficient provision for “*housing (including affordable housing) ... [as well as] community facilities (such as health, education and cultural infrastructure).*” Policies should reflect “*the size, type and tenure of housing needed*”. This policy approach is to include but should not be limited to housing requirements relating to affordable homes, families with children, older people, students, people with disabilities, service families, travellers, those who rent their homes and people wishing to commission the construction of their own homes. Major developments that involve the provision of new housing planning policies and decisions should expect at least 10% of the total number of homes to be delivered for affordable home ownership subject to conditions and exemptions.

B.7 To help to diversify opportunities for builders, promote a better mix of site sizes and increase the number of schemes that can be built-out quickly to meet housing need, the NPPF states that at least 10% of the sites allocated for housing through a local authority’s plan should be half a hectare or smaller.

B.8 Where there is an identified need, development of sites not already allocated for housing to provide entry-level homes suitable for first-time buyers is to be supported by local planning authorities unless such need is already to be met at other locations within the authority area. These sites should comprise of entry-level homes that offer one or more types of affordable housing.

B.9 The document also promotes a theme of enhancing healthy and safe communities which is to be achieved by creating places which “*promote social interaction (and) enable and support healthy lifestyles.*”

¹ United Nations (1998). Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters. (see <https://www.unep.org/fileadmin/DAM/env/pp/documents/cep43e.pdf>).

² United Nations (2002). Declaration on Sustainable Development (Johannesburg Declaration). (see https://ec.europa.eu/environment/archives/wssd/documents/wssd_pol_declaration.pdf).

³ Ministry of Housing, Communities and Local Government (last updated 19 June 2019). National Planning Policy Framework. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf).

⁴ Ministry of Housing, Communities and Local Government (2021). National Planning Policy Framework [online]. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf).

B.10 As part of this approach social, recreational and cultural facilities and services that the community needs should be provided guided by planning policies which:

- *“plan positively provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services;*
- *support the delivery of local strategies to improve health, social and cultural wellbeing for all sections of the community;*
- *help prevent unnecessary loss of valued facilities and services.”*

B.11 Plan making through the guidance of the NPPF recognises the important role of access to open spaces and other facilities which provide opportunities for sport and physical activity has in terms of health and wellbeing of communities. The importance of delivering a sufficient choice of school places to meet the needs of existing and new communities is also recognised in the document and local planning authorities should take a *“proactive, positive and collaborative approach to meeting this requirement”*.

B.12 The NPPF also sets out that the standard method provided in national planning guidance should be used to undertake a local housing need assessment identifying the minimum number of homes needed. The **Housing Delivery Test Measurement Rule Book** (2018)⁵ provides this standard method allowing for calculation of objectively assessed housing need using government household forecasts adjusted for local house prices and local earnings. Unmet need from neighbouring areas will also need to be taken into account as part of the calculation.

B.13 The NPPF is supported by planning practice guidance relating to:

- **Housing needs of different groups (2021)**⁶ provides advice on planning for affordable, private rented, self-build, student and rural housing needs.
- **Healthy and safe communities (2019)**⁷ provides guidance on achieving healthy, safe and inclusive communities, estate regeneration and school place provision.
- **Housing supply and delivery (2019)**⁸ sets out guidance on five-year land supply and Housing Delivery Test.
- **Housing for older and disabled people (2019)**⁹ provides guidance on preparing planning policies for accessible and adaptable housing and inclusive design.
- **Noise (2019)**¹⁰ advises on how planning can manage potential noise impacts in new development.
- **Light pollution (2019)**¹¹ advises on how to consider artificial light within the planning system.
- **Open space, sports and recreation facilities, public rights of way and local green space (2014)**¹² provides key advice on open space, sports, recreation, public rights of way, National Trails and Local Green Space designation.

B.14 Select Committee on Public Service and Demographic Change Report: Ready for Ageing?¹³: warns that society is underprepared for the ageing population. The report states that “longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises”. The report highlights the under provision of specialist housing for older people and the need to plan for the housing needs of the older population as well as younger people.

⁵ Ministry of Housing, Communities and Local Government (July 2018). Housing Delivery Test Measurement Rule Book (online). (see: <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>)

⁶ Ministry of Housing, Communities and Local Government (2021). Housing needs of different groups. (see <https://www.gov.uk/guidance/housing-needs-of-different-groups#addressing-the-need-for-different-types-of-housing>)

⁷ Ministry of Housing, Communities and Local Government (2019). Healthy and Safe communities. (see <https://www.gov.uk/guidance/health-and-wellbeing>)

⁸ Ministry of Housing, Communities and Local Government (2019). Housing supply and delivery. (see <https://www.gov.uk/guidance/housing-supply-and-delivery>)

⁹ Ministry of Housing, Communities and Local Government (2019). Housing for older and disabled people. (see <https://www.gov.uk/guidance/housing-for-older-and-disabled-people>)

¹⁰ Ministry of Housing, Communities and Local Government (2019). Noise. (see <https://www.gov.uk/guidance/noise--2>)

¹¹ Ministry of Housing, Communities and Local Government (2019). Light pollution. (see <https://www.gov.uk/guidance/light-pollution>)

¹² Ministry of Housing, Communities and Local Government (2014). Open space, sports and recreation facilities, public rights of way and local green space. (see <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>)

¹³ Select Committee on Public Service and Demographic Change (2013). Ready for Ageing? (see <https://publications.parliament.uk/pa/ld201213/ldselect/ldpublic/140/140.pdf>).

B.15 Fair Society, Healthy Lives¹⁴: Investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is “overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities”.

B.16 Planning Policy for Traveller Sites¹⁵: Sets out the Government’s planning policy for traveller sites, replacing the older version published in March 2012. The Government’s overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

B.17 Laying the foundations: a housing strategy for England¹⁶: Aims to provide support to deliver new homes and improve social mobility.

B.18 Healthy Lives, Healthy People: Our strategy for public health in England¹⁷: Sets out how the Government’s approach to public health challenges will:

- Protect the population from health threats – led by central government, with a strong system to the frontline.
- Empower local leadership and encourage wide responsibility across society to improve everyone’s health and wellbeing and tackle the wider factors that influence it.
- Focus on key outcomes, doing what works to deliver them, with transparency of outcomes to enable accountability through a proposed new public health outcomes framework.
- Reflect the Government’s core values of freedom, fairness and responsibility by strengthening self-esteem, confidence and personal responsibility; positively promoting healthy behaviours and lifestyles; and adapting the environment to make healthy choices easier.
- Balance the freedoms of individuals and organisations with the need to avoid harm to others, use a ‘ladder’ of interventions to determine the least intrusive approach necessary to achieve the desired effect and aim to make voluntary approaches work before resorting to regulation.

B.19 A Green Future: Our 25 Year Plan to Improve the Environment¹⁸: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. It identifies six key areas around which action will be focused. Those of relevance to this chapter are: using and managing land sustainably; and connecting people with the environment to improve health and wellbeing. Actions that will be taken as part of these two key areas are as follows:

- Using and managing land sustainably:
 - Embed an ‘environmental net gain’ principle for development, including housing and infrastructure.
- Connecting people with the environment to improve health and wellbeing:
 - Help people improve their health and wellbeing by using green spaces including through mental health services.
 - Encourage children to be close to nature, in and out of school, with particular focus on disadvantaged areas.
 - “Green” our towns and cities by creating green infrastructure and planting one million urban trees.
 - Make 2019 a year of action for the environment, working with Step Up To Serve and other partners to help children and young people from all backgrounds to engage with nature and improve the environment.

¹⁴ The Marmot Review (2011). Fair Society, Healthy Lives. (see <http://www.parliament.uk/documents/fair-society-healthy-lives-full-report.pdf>).

¹⁵ Department for Communities and Local Government (2015). Planning policy for traveller sites. (see <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>).

¹⁶ HM Government (2011). Laying the Foundations: A Housing Strategy for England. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7532/2033676.pdf).

¹⁷ HM Government (2010). Healthy Lives, Healthy People: Our strategy for public health in England. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/216096/dh_127424.pdf).

¹⁸ HM Government (2018). A Green Future: Our 25 Year Plan to Improve the Environment. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf).

B.20 The Levelling Up the United Kingdom White Paper (2022)¹⁹ sets out how the UK Government will spread opportunity more equally across the UK. It comprises 12 UK-wide missions to achieve by 2030. Missions which relate to population, health and wellbeing state that by 2030:

- The gap in Healthy Life Expectancy (HLE) between local areas where it is highest and lowest will have narrowed, and by 2035 HLE will rise by five years.
- Well-being will have improved in every area of the UK, with the gap between top performing and other areas closing.
- Homicide, serious violence, and neighbourhood crime will have fallen, focused on the worst-affected areas.
- Pride in place, such as people's satisfaction with their town centre and engagement in local culture and community, will have risen in every area of the UK, with the gap between the top performing and other areas closing.
- The number of primary school children achieving the expected standard in reading, writing and maths will have significantly increased. In England, this will mean 90% of children will achieve the expected standard, and the percentage of children meeting the expected standard in the worst performing areas will have increased by over a third.
- Renters will have a secure path to ownership with the number of first-time buyers increasing in all areas; and the Government's ambition is for the number of non-decent rented homes to have fallen by 50%, with the biggest improvements in the lowest performing areas.

B.21 The Levelling Up and Regeneration Bill (2022)²⁰ sets out the direction for planning and makes provisions to support the levelling-up agenda. It seeks to streamline the planning process whilst attaching greater weight to development plans. It also aims to improve infrastructure delivery with a new levy system, improve alignment between plans to address cross-boundary issues, and will introduce added protection for heritage assets. The Bill also states that existing EU-generated systems of SEA, HRA and EIA will eventually be replaced by a simpler process known as 'Environmental Outcomes Reports'.

B.22 National Design Guide (2021)²¹: sets out the Government's priorities for well-designed places in the form of ten characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

B.23 Build Back Better: Our Plan for Health and Social Care (2021)²² sets out the government's new plan for health and social care. It provides an overview of how this plan will tackle the elective backlog in the NHS and put the NHS on a sustainable footing. It sets out details of the plan for adult social care in England, including a cap on social care costs and how financial assistance will work for those without substantial assets. It covers wider support that the government will provide for the social care system, and how the government will improve the integration of health and social care. It explains the government's plan to introduce a new Health and Social Care Levy.

B.24 COVID-19 Mental Health and Wellbeing Recovery Action Plan (2021)²³ sets out the Government's plan to prevent, mitigate and respond to the mental health impacts of the pandemic during 2021 and 2022. Its main objectives are to support the general population to take action and look after their own mental wellbeing; to take action to address factors which play a crucial role in shaping mental health and wellbeing outcomes; and, to support services to meet the need for specialist support.

B.25 A fairer private rented sector White Paper (2022)²⁴ aims to build upon the vision of the Levelling Up White Paper and reform the Private Rented Sector and improve housing quality. It outlines that everyone deserves a secure and decent home and outlines measures to improve the experience of renters in the Private Rented Sector.

¹⁹ Department for Levelling Up, Housing and Communities (2022). White Paper Levelling Up the United Kingdom. (see <https://www.gov.uk/government/publications/levelling-up-the-united-kingdom>)

²⁰ Department for Levelling Up, Housing and Communities (2022). Levelling Up and Regeneration Bill (online). (see <https://www.gov.uk/government/collections/levelling-up-and-regeneration-bill>).

²¹ Ministry of Housing, Communities and Local Government (2021). National Design Guide (online). (see: <https://www.gov.uk/government/publications/national-design-guide>)

²² Department of Health and Social Care (2021). Build Back Better: Our Plan for Health and Social Care (online). See <https://www.gov.uk/government/publications/build-back-better-our-plan-for-health-and-social-care>.

²³ Department for Health and Social Care and Cabinet Office (2021). COVID-19 mental health and wellbeing recovery action plan. (see <https://www.gov.uk/government/publications/covid-19-mental-health-and-wellbeing-recovery-action-plan>).

²⁴ Department for Levelling Up, Housing and Communities (2022). A fairer private rented sector. (see <https://www.gov.uk/government/publications/a-fairer-private-rented-sector/a-fairer-private-rented-sector#executive-summary>).

B.26 The Charter for Social Housing Residents: Social Housing White Paper (2020)²⁵ sets out the Government's actions to ensure residents in social housing are safe, listened to, live in good quality homes and have access to redress when things go wrong.

B.27 Using the planning system to promote healthy weight environments²⁶ (2020), **Addendum (2021)**²⁷ provides a framework and starting point for local authorities to clearly set out in local planning guidance how best to achieve healthy weight environments based on local evidence and needs, by focusing on environments that enable healthier eating and help promote more physical activity as the default. The Addendum provides updates on the implications for planning for a healthier food environment, specifically on the hot food takeaways retail uses, and sets out recommended actions in light of changes to the Use Class Order (UCO) in England from 1 September 2020.

Sub-national

B.28 Babergh and Mid Suffolk District Councils Joint Homes and Housing Strategy (2022)²⁸: Babergh and Mid Suffolk District Councils have produced their joint Homes and Housing strategy to provide focus and show their ongoing commitment to meet and address the housing challenges across the districts. The Joint Homes and Housing Strategy has nine strategic aims:

- The housing market functions effectively, providing homes which are as affordable as possible; to meet the needs of residents and support the local economy.
- There is a wide and varied choice of good quality, sustainable homes of different sizes, types and tenures, to meet the needs of a wide range of different households.
- Homelessness is prevented and our services provide positive and planned interventions.
- Babergh and Mid Suffolk is an effective social landlord known for delivering quality services.
- Homes are in high quality, sustainable environments, served by jobs and community facilities, appropriate green spaces, effective transport links and other necessary infrastructure.
- Best use is made of private sector land and private accommodation across the Districts.
- People live in vibrant and well-connected communities; and homes and communities continue to meet the changing needs of residents.
- Everyone has a suitable home, and residents are able to live as healthily, safely and independently as possible within sustainable communities.
- Both councils have strong relationships with residents, developers and other partners that enable them to deliver housing, infrastructure and services effectively, and to innovate where appropriate.

B.29 Babergh and Mid Suffolk District Councils Leisure, Sport and Physical Activity Strategy (2021)²⁹: The strategy establishes a robust policy position and a clear set of strategic priorities for how the Joint Councils will support the delivery of sport and physical activity services in the future. It set out what the Councils will continue to do, building on success of the past; what they will support and enable through new ways of working; and what they will no longer do, promoting self-reliance where appropriate. The strategy highlights and fully embraces a strategic shift towards supporting wider health and wellbeing outcomes across the Districts and identifies physical inactivity, particularly amongst specific groups as a key challenge for the Councils and their partners to address.

²⁵ Ministry of Housing, Community and Local Government (2020). The charter for social housing residents: social housing white paper: (see <https://www.gov.uk/government/publications/the-charter-for-social-housing-residents-social-housing-white-paper#full-publication-update-history>)

²⁶ Public Health England (2020). Guidance and supplementary planning document template for local authority public health and planning teams. [online]. (see <https://www.gov.uk/government/publications/healthy-weight-environments-using-the-planning-system>).

²⁷ Public Health England (2021). Addendum: Hot food takeaways use in the new Use Class Order. [online]. (see <https://www.gov.uk/government/publications/healthy-weight-environments-using-the-planning-system/addendum-hot-food-takeaways-use-in-the-new-use-class-order>).

²⁸ BMSDC (2022). Joint homes and housing strategy. (see <https://www.babergh.gov.uk/assets/Housing-and-Homelessness/Housing-Strategy/2022-refresh/JOINT-HOMES-AND-HOUSING-STRATEGY-2022-2.pdf>).

²⁹ BMSDC (2021). Leisure, Sport and Physical Activity Strategy. (see <https://baberghmidssuffolk.moderngov.co.uk/documents/s23553/Appendix%20A%20LSPA%20Strategy%20Update%20Report%20-%20Final%20Ver%202022.0.pdf>).

B.30 Babergh and Mid Suffolk Infrastructure Delivery Plan (2020)³⁰: Aims to consider all infrastructure needs to enable sustainable development and growth supporting residents, businesses, communities, the environment and individuals. A key objective is prioritising investment into strategic services and infrastructure. The report also considers collaboration of organisations to provide funding and the phasing of infrastructure may occur depending on the degree of growth.

B.31 Babergh and Mid Suffolk Open Space Study (2019): Provides an audit of the quantity and quality of existing provision in the Districts and assesses the need for future provision.

B.32 Joint Homelessness Reduction and Rough Sleeping Strategy³¹: This Strategy covers the period 2019-2024 and sets out what BMSDC will do to prevent or relieve homelessness.

B.33 Joint Health and Wellbeing Board Strategy Refresh 2019-2022³²: The document provides a refresh on Suffolk's Joint Health and Wellbeing Strategy 2012-2022 and helps to guide the work of a range of statutory, voluntary, community and private sector agencies committed to improving health and wellbeing in Suffolk.

B.34 Transforming Suffolk, Suffolk's Community Strategy 2008 to 2028³³: Sets out ambitions for Suffolk to be recognised for its outstanding environment and quality of life for all. The strategy aims to help make Suffolk the greenest county by enhancing the natural environment while also being an exemplar when tackling climate change. The aim is also to create a prosperous and vibrant economy; learning and skills for the Future; and safe, healthy and inclusive communities.

B.35 Suffolk's Special Educational Needs and Disability (SEND) Strategy 2021-2023³⁴: This Strategy outlines the priorities Suffolk CC are working towards to improve SEND Services in Suffolk, and informs the direction of all their programmes of work. It addresses the wider improvements that parents, carers and professionals have raised as being important to ensure better outcomes for children and young people.

B.36 Suffolk Green Access Strategy, Rights of Way Improvement Plan (ROWIP) 2020-2030³⁵: The Countryside and Rights of Way Act 2000 requires each highway authority to produce a Rights of Way Improvement Plan (ROWIP). This Plan contains a statement of the actions proposed for the management of public rights of way and for securing an improved network of routes in Suffolk. It also addresses open access sites, informal access arrangements, and access for walking and cycling on the wider highway network.

B.37 Babergh and Mid Suffolk District Councils Communities Strategy 2019-2036³⁶: This Strategy seeks to bring volunteers, community leaders and publicly funded services together to plan and provide the most sustainable support so that BMSDC communities are resilient and connected places for people to live and work. The Strategy sets out both the opportunities and challenges this presents as well as tactics for delivering change and improvements. The vision is for "communities to thrive" now and in the future, built on a balanced and targeted range of services and support, equally accessible to all residents and their future generations. The strategic aim is to provide guidance, support and inspiration to BMSDC communities and the objectives are for all communities to be attractive, successful and connected.

Current baseline

Population

B.38 The latest statistics found that in 2021, Babergh District had a population of 92,700 people, with 53,100 of these residents aged 16-64³⁷. Mid Suffolk District had a population of 103,400 people in 2020, with 60,800 residents aged 16-64³⁸. Babergh

³⁰ BMSDC (2020). Infrastructure Delivery Plan. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Infrastructure2020/BMSDC-IDP-Sept-2020.pdf>)

³¹ BMSDC (2019). Joint Homelessness Reduction and Rough Sleeping Strategy 2019-2024. (see <https://www.babergh.gov.uk/assets/Housing-and-Homelessness/Housing-Strategy/HRRSS-2019-2024-Final.pdf>).

³² Health and Wellbeing Suffolk (2019). Joint Health and Wellbeing Board Strategy Refresh. (see <https://www.suffolk.gov.uk/assets/council-and-democracy/our-aims-and-transformation-programmes/Joint-Health-and-Wellbeing-Board-Strategy-Refresh-2019-2022.pdf>).

³³ Suffolk Strategic Partnership (2008). Transforming Suffolk, Suffolk's Community Strategy 2008-2028 (see https://www.ipswich.gov.uk/sites/default/files/scd07_-_suffolk_community_strategy.pdf).

³⁴ Suffolk County Council (2021). Suffolk's Special Educational Needs and Disability (SEND) Strategy 2021-2023. (see https://search3.openobjects.com/mediamanager/suffolk/enterprise/files/2017-05-23_suffolk_send_strategy_one_page_overview.pdf).

³⁵ Suffolk County Council (2020). Suffolk Green Access Strategy Rights of Way Improvement Plan (ROWIP) 2020-2030. (see https://search3.openobjects.com/mediamanager/suffolk/enterprise/files/send_strategy_2021-2023_one_page_summary.pdf). <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/green-access-strategy/>

³⁶ NOMIS (2021). Labour Market Profile – Babergh. (see <https://www.nomisweb.co.uk/reports/lmp/la/1946157239/report.aspx?town=Babergh#tabresp0p>).

³⁸ NOMIS (2021). Labour Market Profile – Mid Suffolk (see <https://www.nomisweb.co.uk/reports/lmp/la/1946157242/report.aspx?town=Mid%20Suffolk#tabresp0p>).

District's population is expected to grow to 96,400 people³⁹ and Mid Suffolk District's population is projected to reach 109,000 people by 2031⁴⁰.

B.39 Babergh has two main towns being the market town of Sudbury in the west and the town of Hadleigh in the centre. Mid Suffolk has three market towns being Stowmarket and Needham Market in the south of the District, and Eye in the north. Both Districts have many rural villages and open countryside where in Babergh 69% and in Mid Suffolk 75% of the population live. Overall, Babergh District has around 1.54 persons per hectare while Mid Suffolk District has a slightly lower population density at around 1.18 hectares per person⁴¹.

B.40 According to BMSDC's Joint Annual Monitoring Report⁴², both Districts have similar demography with fewer younger people and an aging population.

B.41 In Babergh District the population has remained fairly consistent with 53,800 individuals aged 16-64 in 2008, to 52,700 in 2020⁴³. Between October 2018 and September 2019 there were 4,400 retired residents who represented 35.4% of the District's population. Students made up 3,500 residents between October 2018 and September 2019 which is 28.4% of the District's population⁴⁴.

B.42 In Mid Suffolk District, many of the sample population sizes were too small for reliable estimates. Despite this, the latest data found that between October 2017 and Sept 2018, 3,900 residents were retired, making up 37.6% of the population. The last estimate for the number of students in the District was 3,300 people between October 2015 and September 2016 at 3,300 people, 24.9% of the population.

B.43 The 2011 Census found that ethnic minorities constituted around 2.2% of Babergh District population which is around 1,895 individuals. The largest ethnic minority group were the mixed/multiple ethnic groups which made by 0.9% of the population, followed by Asian/Asian British at 0.8%⁴⁵.

B.44 For Mid Suffolk District, the 2011 Census showed that ethnic minorities constituted around 2.1% of the total population. The largest ethnic minority group were Asian/ Asian British which made up 0.7% of the total population, followed by Black/African/Caribbean/Black British at 0.4%.

Housing

Provision and affordability

B.45 In the past few years local house prices in BMSDC have steadily increased, until 2019 where there was a slight reduction, improving affordability⁴⁶.

B.46 The table below shows the housing affordability ratio across the Districts which is calculated by dividing average house prices by average annual earnings to create a ratio. House prices are taken from House Price Statistics for Small Areas (HPSSAs). However, the statistics are also partially based on a survey sample of earnings data. Therefore, the data should be interpreted over a longer time series⁴⁷.

Table B.1: Babergh and Mid Suffolk: Ratio of workplace-based median house price to median earnings ratio

Area	2014	2015	2016	2017	2018	2019
Babergh	8.91	9.23	9.48	11.26*	10.77	11.39
Mid Suffolk	7.35*	8.02	7.53	8.98	10.20	9.46

³⁹ Population Projections Babergh. (see <https://www.suffolkobservatory.info/population/report/view/17e45add2fd547c38a1a20bc2635673b/E07000200/>).

⁴⁰ Population Projections Mid Suffolk. (see <https://www.suffolkobservatory.info/population/report/view/17e45add2fd547c38a1a20bc2635673b/E07000203/>).

⁴¹ Local Government Association (2019). Population density, persons per hectare in England (see <https://lginform.local.gov.uk/reports/lqastandard?mod-metric=176&mod-area=E92000001&mod-group=E07000203&mod-type=area>).

⁴² BMSDC (2021-22). Annual Monitoring Report. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/AMR/Babergh-and-Mid-Suffolk-AMR-2021-2022.pdf>).

⁴³ NOMIS Population Aged 16-64 – Time Series. (see https://www.nomisweb.co.uk/reports/lmp/la/1946157239/subreports/wapop_time_series/report.aspx?).

⁴⁴ NOMIS Economically Inactive – Time Series. (see https://www.nomisweb.co.uk/reports/lmp/la/1946157239/subreports/einact_time_series/report.aspx?).

⁴⁵ NOMIS Babergh Area Profile. (see <https://www.nomisweb.co.uk/reports/localarea?compare=E07000200>).

⁴⁶ BMSDC (2021-22). Annual Monitoring Report (see <https://www.babergh.gov.uk/assets/Strategic-Planning/AMR/Babergh-and-Mid-Suffolk-AMR-2021-2022.pdf>). **Error! Hyperlink reference not valid.**

⁴⁷ Office for National Statistics (2018). Housing affordability in England and Wales 2018. (see <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2018>).

Area	2014	2015	2016	2017	2018	2019
Suffolk	7.01	7.20	7.65	8.04	8.69	8.86
East of England	7.43	7.83	8.42	8.96	9.66	9.72

NB ratios marked with * have been calculated using annualised weekly earnings.

B.47 In 2021/22, the target in the Babergh District was to build 403 new dwellings. However, this was exceeded with 758 new dwellings being built, representing 188% of the annual target set by the national standard methodology. In Mid Suffolk, the target was 513 new dwellings but 862 were built, representing 168% of the annual target. Therefore, overall, in the latest year for which data are available, both Babergh District and Mid Suffolk District exceeded their housing targets.

B.48 The two tables below show the percentage of affordable homes built in the Districts over the last 5 years. In 2021/22 only 17% of homes built in Babergh were affordable housing, compared to 22% in 2020/21. For Mid Suffolk in 2021/22, 23% of homes were affordable housing, compared to 29% in 2020/21. Therefore, the proportion of affordable homes built in the previous two years has decreased.

Table B.2: Babergh net residential completions by annual monitoring report year

Babergh					
AMR Year	Net Completions (A)	Of which Affordable (B)	% Affordable (B as % of A)	No. of Windfall (C)	% Windfall (C as % of A)
2021/22	758	130	17%	736	97%
2020/21	402	89	22%	346	86%
2019/20	293	114	39%	218	74%
2018/19	579	52	9%	456	79%
2017/18	331	71	21%	221	67%
2016/17	226	83	37%	168	74%
2015/16	157	27	18%	124	79%
Totals	2746	564	-	2269	-

Table B.3: Mid Suffolk net residential completions by annual monitoring report year

Mid Suffolk					
AMR Year	Net Completions (A)	Of which Affordable (B)	% Affordable (B as % of A)	No. of Windfall (C)	% Windfall (C as % of A)
2021/22	862	196	23%	710	82%
2020/21	672	193	29%	585	87%
2019/20	451	128	28%	442	98%
2018/19	690	70	10%	583	84%

Mid Suffolk					
AMR Year	Net Completions (A)	Of which Affordable (B)	% Affordable (B as % of A)	No. of Windfall (C)	% Windfall (C as % of A)
2017/18	426	114	27%	292	69%
2016/17	305	53	17%	230	75%
2015/16	304	78	26%	240	79%
Totals	3710	926	-	3082	-

B.49 In November 2019, the mean price of dwellings in Babergh District and Mid Suffolk District was £292,305 and £262,988, respectively. This is above the national average of £251,222 and for Babergh, is also above the regional average of £291,281⁴⁸.

B.50 A suitable mix of housing is important to ensure all housing needs are met within the District. The 2011 Census identified the housing stock within the District and is shown in the table below. The majority of housing within both Districts is detached houses, followed by semi-detached, then terraced houses and finally flats.

Table B.4: Type of dwellings and number of households in Babergh and Mid Suffolk (excluding caravans and other mobile and temporary structures)

Type of Dwelling	Number of Households (2011)			
	Babergh	%	Mid Suffolk	%
Detached Houses	16,231	42%	19,908	47%
Semi-Detached Houses	11,476	30%	13,676	33%
Terraced Houses	8,458	21%	5,753	14%
Flats	2,763	7%	2,317	6%
Total	38,928	100%	41,654	100%

B.51 As set out in the Strategic Housing Market Assessment (SHMA) (Part 2 update)⁴⁹, the majority of homes across all tenures are large family units, with the owner-occupied sector comprising 66.7% of all homes. The Social Rent/Affordable Rent tenure currently stands at 14.6%. The SHMA shows that in 18 years' time, 65.9% of all new housing in the Ipswich Housing Market Area (which includes BMSDC), should be owner-occupied and 14.5% Social Rent/Affordable Rent.

B.52 As mentioned previously, both Districts have an ageing population. According to the Suffolk Housing and Health Needs Assessment⁵⁰, approximately 6,000 over 75s who need specialist housing (defined as sheltered, extra care, residential care or nursing home) already have difficulties accessing housing provision in Suffolk County. Furthermore, there are an estimated 10,687 properties in Suffolk which do not meet the Decent Home Standard under the Housing Health and Safety rating because they are excessively cold. Indeed, the housing stock in Suffolk is predominantly old and inefficient to heat.

B.53 In addition to older people, other vulnerable people may also have specialist housing needs. Suffolk is currently significantly worse than the England average at meeting the need of residents with learning difficulties for secure and

⁴⁸ UK House Price Index (2020). House Price Statistics.(see <https://landregistry.data.gov.uk/app/ukhpi>).

⁴⁹ Peter Brett Associates (2019). Ipswich Housing Market Area.(see <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/SHMA-Part-2-update-2019.pdf>).

⁵⁰ Suffolk County Council (2018). Suffolk Housing and Health Needs Assessment.(see https://www.healthysuffolk.org.uk/uploads/Suffolk_Housing_and_Health_Final_Mar18HNB.pdf).

appropriate accommodation. According to the same document, the number of people with a learning difficulty is forecast to increase by 9% by 2035. As such, there will be an increased demand for housing that meets specialist needs.

Homelessness

B.54 Table B.5 shows an estimation of the number of rough sleepers recorded over the past five years in BMSDC, using Homeless Link. The number of people sleeping rough within the Districts has decreased, which may be related to the fact BMSDC were successful in jointly bidding with West Suffolk Councils through the 'Trailblazer' programme in 2016 for a Rough Sleeper Prevention and Support Worker.

Table B.5: Estimated rough sleeper count in BMSDC (November)

	2014	2015	2016	2017	2018
Babergh	0	2	7	1	0
Mid Suffolk	0	2	1	2	0

Gypsy, Traveller and Travelling Showpeople

B.55 A report commissioned by BMSDC featured 100 surveys being completed by Gypsy and Traveller families between November 2016 and January 2017⁵¹. There were 87 surveys completed by those on authorised sites, eight on unauthorised developments, three on unauthorised encampments and two families residing on sites with temporary planning permission. The majority of families had lived on site for more than five years and most were not intending to move in the future.

B.56 Those residing on local authority sites were concerned about the quality and provision of sites resulting in children only being able to safely play on pitches rather than freely on the site, sites being too small to accommodate, too big leading to a mixture of occupants who do not get on and not feeling safe. Families also stated that obtaining planning permission was an issue, as it was felt that there were preconceptions by the wider community.

B.57 There are seven permanent Travelling Showpeople plots in Mid Suffolk and there is a long history of Travelling Showpeople both living and working in the study area. Travelling Showpeople recorded fewer health issues, compared to Gypsies and Travellers. In 2016 all families had travelled, mainly for work, and no families stated that they intended to stop travelling. All of the families own their plots and around a third of families stated they had young members who will require separate accommodation within the next five years, but all would prefer to stay within the local area.

B.58 To establish the number of households residing in boat, postal surveys were completed, and Council Tax records were established. There were 21 permanent boat moorings in Babergh however, this could be an underestimate due to the difficulties in identifying the status and locations of houseboats.

B.59 Only one caravan was recorded in Babergh and 108 caravans in Mid Suffolk. Therefore, when population is taken into account, the density of caravans varies with Babergh having 1 caravan per 100,000 of the population and Mid Suffolk having 109 per 100,000 of the population. The average in England is around 39 caravans per 100,000 of the population and the regional average is 81⁵².

Education

B.60 Around 19% of the population across Babergh and Mid Suffolk are aged 0-17 years old. Around 2.8% (4,220) are school children and full-time students aged 16-17 which is slightly above the national average of 2.7%. However, 2% (2,970) are school children and full-time students aged 18 and over which is below the national average of 5.5%⁵³.

B.61 The 2011 Census data found 22.5% (33,988) of Babergh and Mid Suffolk residents have no qualifications, 4% (6,065) completed an apprenticeship, 14.2% (21,348) have Level 1 qualifications and 26.15 (33,988) have Level 4 and above

⁵¹ BMSDC (2017). Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Final-ANA-Report-May-2017.pdf>).

⁵² BMSDC (2017). Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Final-ANA-Report-May-2017.pdf>).

⁵³ Children & Young People Area Report Suffolk Observatory. (see <https://www.suffolkobservatory.info/children-and-young-people/report/view/a35c270f84c849c797187ff085340613/SHA1/>).

qualifications^{54 55}. The amount of people with no qualifications is equal to the national average and higher than the County average (24.3%). However, the amount of people with Level 4 qualifications and above is lower than the national average (27.4%).

B.62 The location of education facilities in the Districts is shown in **Figure B.1**.

Deprivation

B.63 In 2019 Babergh ranked 212 out of 317 local authorities in England (1 being the most deprived), compared with a ranking of 197 in 2015. The Index of Multiple Deprivation (IMD) uses Lower Layer Super Output Areas (LSOA) to measure deprivation at local authority and county level. There are 54 LSOAs in Babergh. Around Sudbury and Great Cornard there are pockets of deprivation and some rural areas are particularly deprived in terms of access to housing and other services. Babergh 008A is located on the edge of Sudbury, the most deprived area within the District and ranked 7,697 out of 32,844 LSOAs in England. This area is amongst the top 20% most deprived neighbourhoods in England⁵⁶.

B.64 In 2019 Mid Suffolk ranked 229 out of 317 local authorities in England, where 1 is the most deprived, compared with a ranking of 233 in 2015. There are 56 LSOAs in Mid Suffolk. The Districts most deprived areas are around Stowmarket, with Mid Suffolk 008C being ranked 3,344 out of 32,844 LSOAs in England. In 2015, this area was ranked 5,405 and therefore, there has been a decrease in deprivation in comparison to other LSOA areas in England. This area is amongst the top 20% most deprived neighbourhoods in England.

B.65 In Babergh it was estimated that 3,863 out of 39,487 households were fuel poor in 2016, which equates to 9.6% of all households in the District. In Mid Suffolk 4,048 out of 42,263 households were fuel poor in 2016, which also equates to 9.6% of total households in the District. Both Districts are slightly above the average for the East of England at 9.4%⁵⁷.

B.66 According to Public Health England, 11.3% (1,615) of children in Babergh live in low-income families and 10.1% in (1,590) Mid Suffolk⁵⁸.

B.67 The distribution of deprivation across the Districts is shown in **Figure B.2**.

Health

B.68 Health is a cross-cutting topic and as such many topic areas explored in this Scoping Report influence health either directly or indirectly. The 2011 Census statistics suggest that health in Babergh is generally good with 82.4% of the population reporting themselves to be in very good or good health. Some 13.2% state they are in fair health, with only 3.4% and 0.9% in bad or very bad health, respectively. Similarly, the 2011 Census statistics suggest that health in Mid Suffolk is generally good with 83.2% of the population reporting themselves to be in very good or good health. Some 12.9% state they are in fair health, with only 3.1% and 0.8% in bad or very bad health, respectively. Therefore, perceived health levels in the Districts are relatively good.

B.69 The 2011 Census also found that 82.6% of the population in Babergh and 83.4% in Mid Suffolk state that their day-to-day activities are not limited by their health. In Babergh 10.2% said they are limited a little and 7.2% said they are limited a lot. For Mid Suffolk, 9.9% said they are limited a little and 6.7% said they are limited a lot.

B.70 The 2011 Census data found that 6,819 people in Babergh and 7,418 in Mid Suffolk provide 1 to 19 hours of unpaid care a week. Furthermore, 1,877 people in Babergh and 1,995 in Mid Suffolk provide 50 or more hours of unpaid care a week.

⁵⁴ Level 1 = 1-4 O Levels/CSE/GCSEs and NWQ Level 1; Level 4 = Degree, Higher Degree, NVQ Level 4-5, HNC, HND.

⁵⁵ Children & Young People Area Report Suffolk Observatory. (see <https://www.suffolkobservatory.info/children-and-young-people/report/view/a35c270f84c849c797187ff085340613/SHA1/>).

⁵⁶ Indices of Deprivation. (see http://dclgapps.communities.gov.uk/imd/iod_index.html#).

⁵⁷ Gov.uk (2018). Sub-regional fuel poverty. (see <https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-data-2018>).

⁵⁸ Public Health England (2019). Babergh Local Authority Health Profile. (see <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000200.html?area-name=babergh>).

B.71 Life expectancy in Babergh is 81.6 for males and 84.7 for females⁵⁹, while in Mid Suffolk life expectancy is 79.6 for males and 83.2 for females⁶⁰. Life expectancy in Babergh is 6.5 years lower for men and 4.3 years lower for women in the most deprived areas, while in Mid Suffolk it is 6.4 years lower for men and 3.6 years for women⁶¹.

B.72 The distribution of health facilities in the Districts is shown in **Figure B.1**.

Open spaces, sports and recreation

B.73 Babergh and Mid Suffolk covers a total area of approximately 565 square miles. In Babergh there are two main towns and the landscape is varied consisting mainly of undulating arable farmland with river valleys. The Orwell and Stour estuaries are found on the eastern and south-eastern sides of the District which have valued wildlife habitats and a distinct character. The southern and eastern parts of the District are also Areas of Outstanding Natural Beauty (AONBs)⁶².

B.74 Mid Suffolk is made up of a combination of market towns, villages and countryside. The north of the District contains the valleys of the River Waveney and Dove and the south includes open fields of High Suffolk to the Valleys of the River Ratt and Gipping in the south.

B.75 Babergh and Mid Suffolk Open Spaces Assessment⁶³ assessed the quality of 519 open spaces in the Districts using criteria set out in the Green Flag Award. The study was a technical assessment and not a full local needs assessment or extensive consultation to inform recommendations. The assessment calculated the amount of existing open space for a range of different use.

Table B.6: Summary of open spaces in Babergh and Mid Suffolk

Typology	Existing (ha)	Per 1,000 people (ha)	Quantity Standards per 1,000 people (ha)
Accessible Natural Greenspace	900.6	4.88	ANGSI*
Amenity Greenspace	233.62	1.27	1.0
Parks and Recreation Grounds	163.16	0.93	1.0
Parks and Recreation Grounds including Outdoor Sport	170.68	0.88	1.0
Open Space for Children	11.35	0.06	0.06
Open Space for Youth	2.48	0.01	0.04
Sports Club Space	68.39	0.37	N/A

*Natural England Accessible Natural Green Space Standards

B.76 Natural England Accessible Natural Green Space Standards (ANGSI) are:

- at least one accessible 20-hectare site within two kilometres of home;
- one accessible 100-hectare site within five kilometres of home; and
- one accessible 500-hectare site within ten kilometres of home; plus
- a minimum of 1 hectare of statutory Local Nature Reserves per thousand population at least 2 hectares in size, no more than 300 metres (5 minutes' walk) from home.

⁵⁹ Public Health England (2019). Babergh Local Authority Health Profile. (see <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000200.html?area-name=babergh>).

⁶⁰ Public Health England (2019). Mid Suffolk Local Authority Health Profile. (see <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000203.html?area-name=mid%20suffolk>).

⁶¹ Public Health England (2019). Mid Suffolk Local Authority Health Profile. (see <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000203.html?area-name=mid%20suffolk>).

⁶² BMSDC (2019). Open Space Assessment. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Babergh-and-Mid-Suffolk-Open-Space-Study-May-2019.pdf>).

⁶³ BMSDC (2019). Open Space Assessment. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Babergh-and-Mid-Suffolk-Open-Space-Study-May-2019.pdf>).

B.77 The table shows that there is more than the set quantity standard of amenity greenspace⁶⁴ per 1,000 of the population. However, parks and recreation grounds are under the set quantity standard even when outdoor sport is included.

B.78 As part of the assessment, a survey with BMSDC parishes was undertaken, which saw 75 responses from 199 parishes. Results found that 68% of Town/Parish Councils were directly responsible for the management of various local spaces and outdoor recreational facilities and 64% of local councils noted a need for additional or improved open space, play and outdoor recreation facilities. Other results found there is not enough space for teenagers (e.g. skateparks and shelters) and there is a need for additional multi-use games areas (MUGAs).

B.79 The distribution of open space in the Districts is shown in **Figure B.3**.

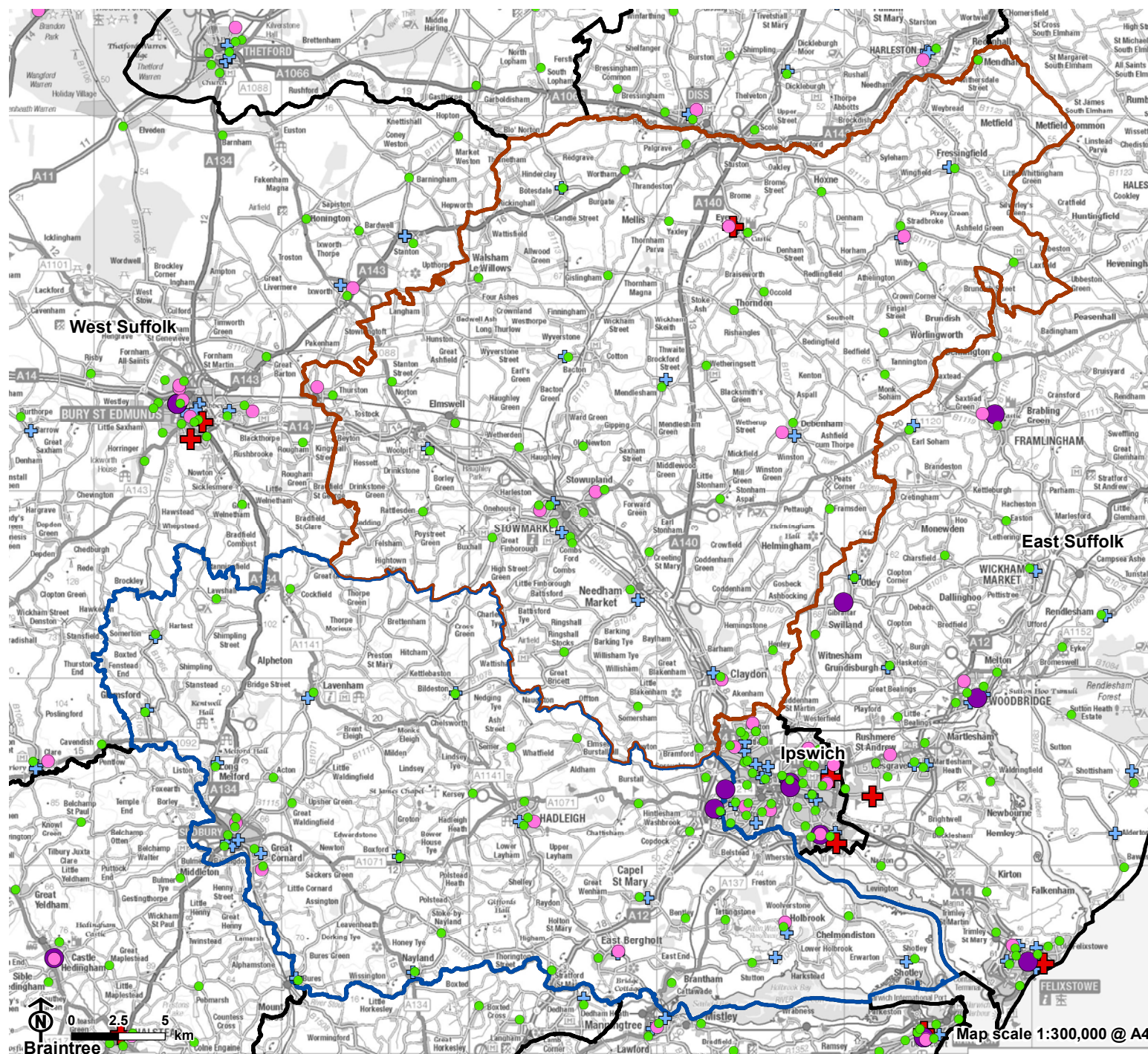
Crime

B.80 In December 2019, there was an increase in burglaries, criminal damage and arson, drugs, theft and weapons possession in Suffolk, from the previous three months⁶⁵.

⁶⁴ Amenity greenspace includes open to free land that is not laid out a certain way or does not have a specific function, such as a park or public playing field.

⁶⁵ UK Crime Stats (2020). Suffolk County Council, England. (see <https://www.ukcrimestats.com/Subdivisions/CTY/2241/>).

Figure B.1: Education Facilities and Health Facilities



- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- + GP practice
- + Hospital
- Primary school
- Secondary school
- Further education

Figure B.2: Indices of Multiple Deprivation (IMD)

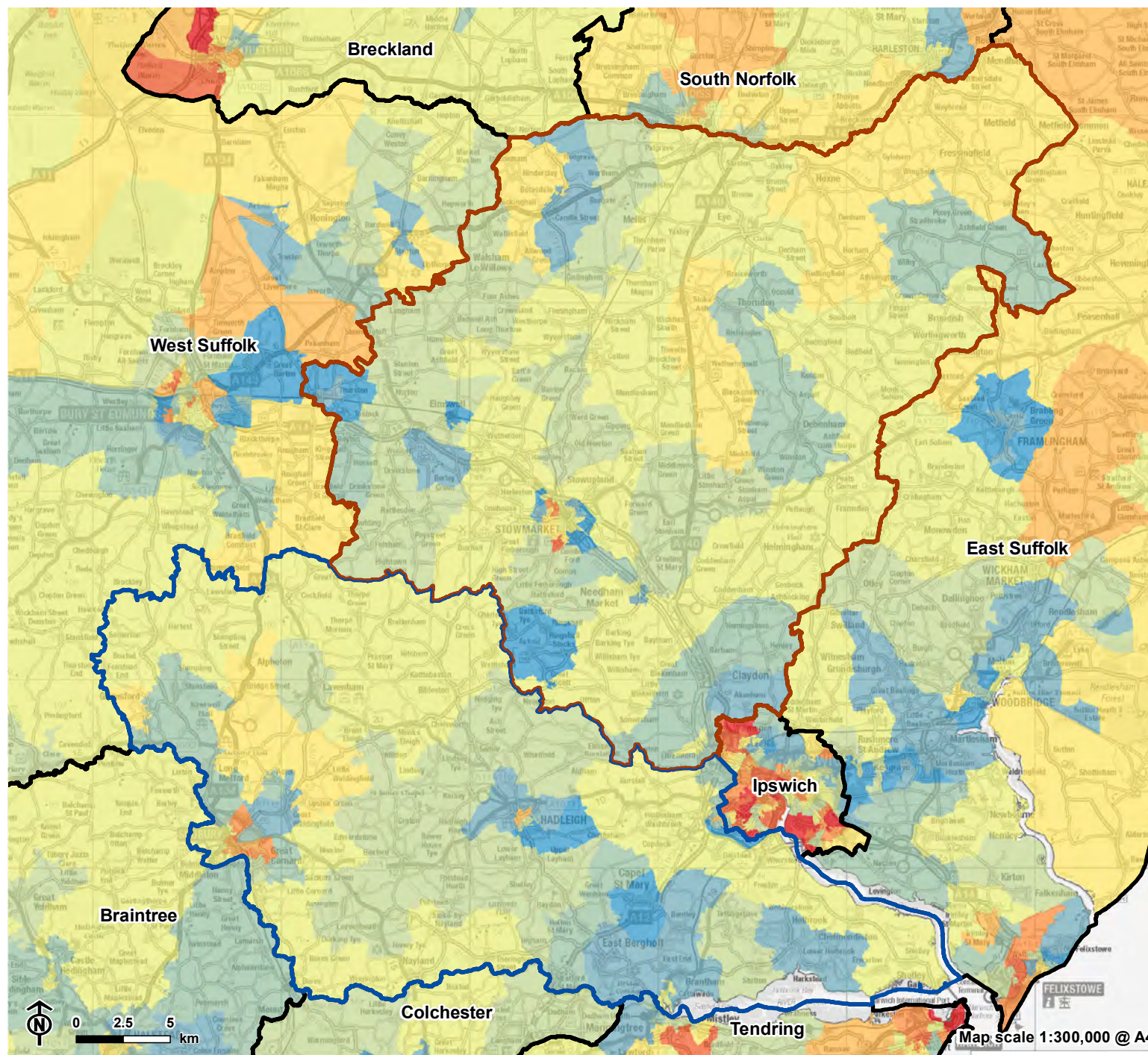
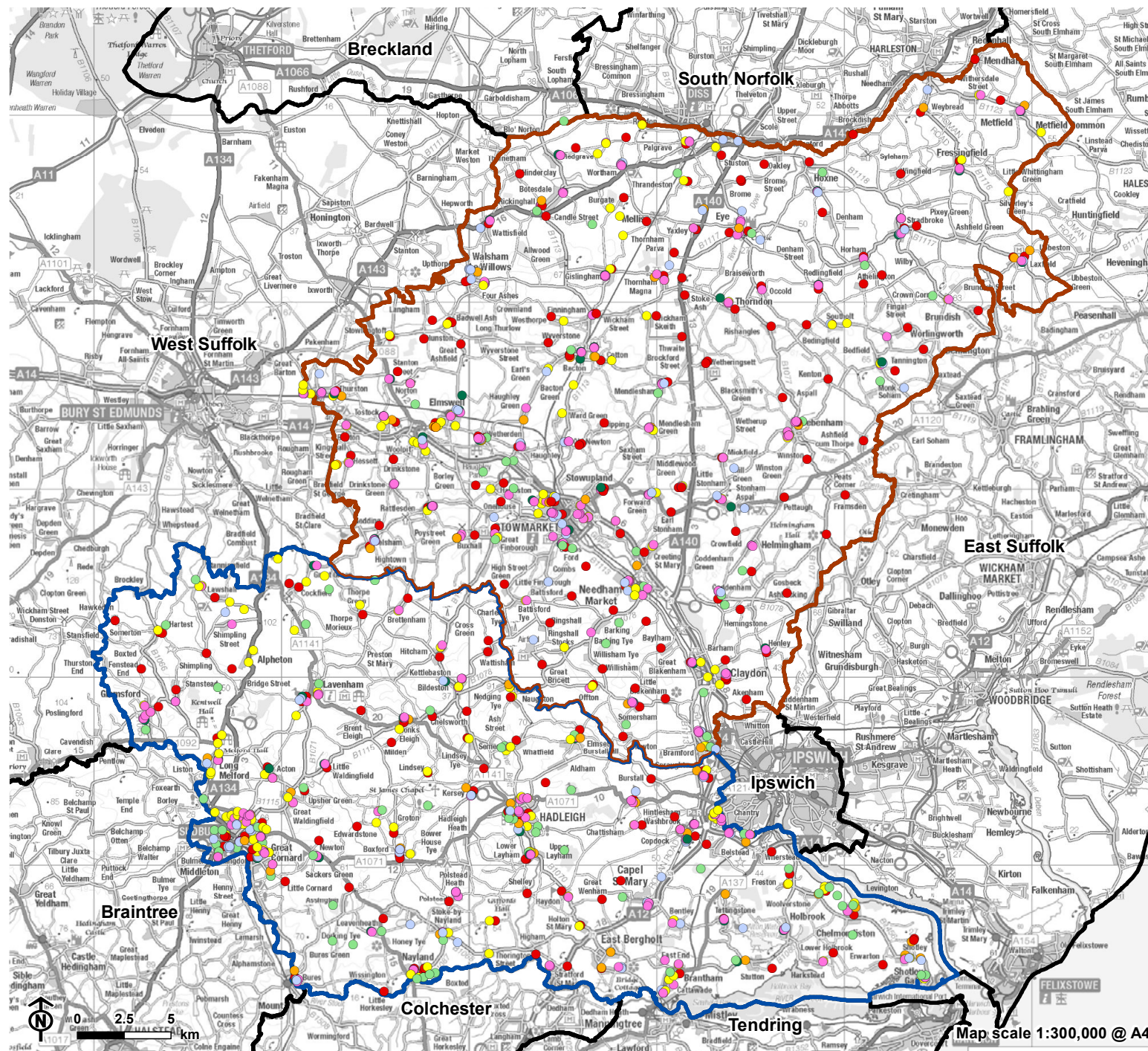


Figure B.3: Open Space



Economy

Policy context

International

B.81 There are no specific international or European economic policy agreements relevant to the preparation of the JLP and the SA, although there are a large number of trading agreements, regulations and standards that set down the basis of trade within the European Union (although these are subject to change now that the UK has left the EU) and with other nations.

National

B.82 The NPPF (2021)⁶⁶ contains an economic objective to “help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.”

B.83 It also requires that planning seeks to “create the conditions in which businesses can invest, expand and adapt” with policies required to “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth”. Policies addressing the economy should also seek “to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.”

B.84 Of particular relevance is the requirement for planning policies to “recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.”

B.85 Planning policies are also required specifically to address support for the rural economy. Sustainable growth and expansion of all types of business and enterprise in rural areas should be supported, both through conversion of existing buildings and well-designed new buildings, while the diversification of the rural economy and promotion of sustainable rural tourism and leisure developments is also supported.

B.86 The NPPF also supports the role of town centres as functioning at the heart of local communities. This support is required to provide for a “*positive approach to [town centres] growth, management and adaptation.*” Included within this support is a requirement to “*allocate a range of suitable sites in town centres to meet the scale and type of development needed, looking at least ten years ahead.*”

B.87 The NPPF is supported by planning practice guidance relating to:

- **Town centres and retail (2020)**⁶⁷ provides guidance on planning for town centre vitality and viability, permitted development, change of use and out of town centre development.

B.88 The **Levelling Up the United Kingdom White Paper (2022)**⁶⁸ sets out how the UK Government will spread opportunity more equally across the UK. It comprises 12 UK-wide missions to achieve by 2030. Missions which relate to economy and employment state that by 2030:

- Pay, employment and productivity will have risen in every area of the UK, with each containing a globally competitive city, with the gap between the top performing and other areas closing.
- The number of people successfully completing high-quality skills training will have significantly increased in every area of the UK. In England, this will lead to 200,000 more people successfully completing high-quality skills training annually, driven by 80,000 more people completing courses in the lowest skilled areas.

⁶⁶ Ministry of Housing, Communities and Local Government (2021). National Planning Policy Framework [online].: (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf).

⁶⁷ Ministry of Housing, Communities and Local Government (2020). Town centres and retail. (see <https://www.gov.uk/guidance/ensuring-the-vitality-of-town-centres>)

⁶⁸ Department for Levelling Up, Housing and Communities (2022). White Paper Levelling Up the United Kingdom. : (see <https://www.gov.uk/government/publications/levelling-up-the-united-kingdom>).

- Domestic public investment in Research & Development outside the Greater South East will increase by at least 40% and at least one third over the Spending Review period, with that additional government funding seeking to leverage at least twice as much private sector investment over the long term to stimulate innovation and productivity growth.
- Every part of England that wants one will have a devolution deal with powers at or approaching the highest level of devolution and a simplified, long-term funding settlement.

B.89 The Levelling Up and Regeneration Bill (2022)⁶⁹ sets out the direction for planning and makes provisions to support the levelling-up agenda. It seeks to streamline the planning process whilst attaching greater weight to development plans. It also aims to improve infrastructure delivery with a new levy system, improve alignment between plans to address cross-boundary issues, and will introduce added protection for heritage assets. The Bill also states that existing EU-generated systems of SEA, HRA and EIA will eventually be replaced by a simpler process known as 'Environmental Outcomes Reports'.

B.90 Build Back Better: Our Plan for Growth (2021)⁷⁰: Sets out a plan to 'build back better' tackling long-term problems to deliver growth that delivers high-quality jobs across the UK while supporting the transition to net zero. This will build on three core pillars of growth: infrastructure, skills and innovation.

B.91 National Planning Practice Guidance (PPG)⁷¹: Reiterates the importance for Local Plans to include a positive strategy for town centres to enable sustainable economic growth and provide a wide range of social and environmental benefits.

B.92 The Local Growth White Paper (2010)⁷²: Highlights the importance of economic policy that focusses on the delivery of strong, sustainable and balanced growth of income and employment over the long-term, growth which is broad-based industrially and geographically to provide equality of access and opportunity and build businesses that are competitive internationally.

B.93 Rural White Paper 2000 (Our Countryside: the future – A fair deal for rural England)⁷³: Sets out the Government's Rural Policy Objectives:

- To facilitate the development of dynamic, competitive and sustainable economies in the countryside, tackling poverty in rural areas.
- To maintain and stimulate communities and secure access to services which is equitable in all the circumstances, for those who live or work in the countryside.
- To conserve and enhance rural landscapes and the diversity and abundance of wildlife (including the habitats on which it depends).
- To promote government responsiveness to rural communities through better working together between central departments, local government, and government agencies and better co-operation with non-government bodies.

B.94 LEP Network Response to the Industrial Strategy Green Paper Consultation (2017)⁷⁴: The aim of the document is to ensure that all relevant local action and investment is used in a way that maximises the impact it has across the Government's strategy. Consultation responses set out how the 38 Local Enterprise Partnerships (LEPs) will work with Government using existing and additional resources to develop and implement a long-term Industrial Strategy.

B.95 Growth Plan 2022⁷⁵: This document makes growth the government's central economic mission, setting a target of reaching 2.5% trend rate. Sustainable growth will lead to higher wages, greater opportunities and provide sustainable funding for public services.

⁶⁹ Department for Levelling Up, Housing and Communities (2022). Levelling Up and Regeneration Bill (online). (see <https://www.gov.uk/government/collections/levelling-up-and-regeneration-bill>).

⁷⁰ HM Treasury (2021). Build Back Better: Our Plan for Growth. (see <https://www.gov.uk/government/publications/build-back-better-our-plan-for-growth/build-back-better-our-plan-for-growth.html>).

⁷¹ Department for Communities and Local Government (2016). Planning Practice Guidance. (see <https://www.gov.uk/government/collections/planning-practice-guidance>).

⁷² Department for Business, Innovation and Skills (2010). Local Growth: Realising Every Place's Potential. (see <https://www.gov.uk/government/publications/local-growth-realising-every-places-potential-hc-7961>).

⁷³ HM Government (2000). Rural White Paper (Our Countryside: the future – A fair deal for rural England). (see <http://www.tourisminsights.info/ONLINEPUB/DEFRA/DEFRA%20PDFS/RURAL%20WHITE%20PAPER%20-%20FULL%20REPORT.pdf>).

⁷⁴ LEP Network (2017). Response to the Industrial Strategy Green Paper Consultation. (see <https://www.lepnetwork.net/media/1470/lep-network-industrial-strategy-response-april-2017-final.pdf>).

⁷⁵ HM Treasury (2022). The Growth Plan 2022. (see <https://www.gov.uk/government/publications/the-growth-plan-2022-documents/the-growth-plan-2022.html#:~:text=The%20Growth%20Plan%202022%20makes,a%20period%20of%20high%20inflation>).

B.96 Agriculture Act 2020⁷⁶: Sets out how farmers and land managers in England will be rewarded in the future with public money for “public goods” – such as better air and water quality, thriving wildlife, soil health, or measures to reduce flooding and tackle the effects of climate change, under the Environmental Land Management Scheme. These incentives will provide a vehicle for achieving the goals of the government’s 25 Year Environment Plan and commitment to reach zero emissions by 2050. The Act will help farmers to stay competitive, increase productivity, invest in new technology and seek a fairer return from the marketplace.

B.97 Agricultural Transition Plan 2021 to 2024⁷⁷: Aims to drive competitiveness, increase productivity, reduce carbon emissions, and generate fairer returns across the agricultural industry. The Transition Plan introduces several new schemes to improve the environment, animal health and welfare, and farm resilience and productivity (e.g., grants will be available for sustainable farming practices, creating habitats for nature recovery and making landscape-scale changes such as establishing new woodland and other ecosystem services).

Sub-national

B.98 Babergh & Mid Suffolk Town Centres & Retail Study (2015)⁷⁸: Includes information regarding shopping habits, the assessment of retail and other town centre uses and health checks of the main towns. The study offers advice on the strengths and weaknesses of centres within the Districts and their ability to accommodate retail, leisure and other town centre uses, including the identification of potentially suitable centres. Advice is also given regarding the level and type of retail, leisure and other town centre uses that would be appropriate for the Districts considering national and local economic trends. The study provides recommendations of definitions retail related primary and secondary frontages, and primary shopping areas for the centres, as well as a hierarchy of town centres.

B.99 Babergh and Mid Suffolk District Councils Economy Recovery Plan (2022)⁷⁹: The plan focuses on building resilience and future growth in the business community. The aim of the recovery plan is to provide a direction for the Councils to support businesses and communities, post COVID-19, to:

- stimulate innovation
- attract inward investment
- encourage strong economic growth

B.100 Babergh and Mid Suffolk Infrastructure Delivery Plan (2020)⁸⁰: Aims to consider all infrastructure needs to enable sustainable development and growth supporting residents, businesses, communities, the environment and individuals. A key objective is prioritising investment into strategic services and infrastructure. The report also considers collaboration of organisations to provide funding and the phasing of infrastructure may occur depending on the degree of growth.

B.101 New Anglia Local Enterprise Partnership Economic Strategy (2017)⁸¹: The Economic Strategy looks ahead to 2036 but focuses on the actions that the New Anglia LEP needs to take over the next four years to secure long term success. According to the Strategy, the LEP will work across all local authorities to integrate inward investment, whilst also attracting highly skilled people. The LEP will also work with the Government to ensure that the unique contribution of the energy sector is well understood and supported.

B.102 New Anglia Norfolk & Suffolk Economic Strategy (2022)⁸²: The Norfolk & Suffolk Economic Strategy outlines ambitious plans for future growth across Norfolk and Suffolk. Bringing together public and private sector partners with education and the VCSE sector, it sets out New Anglia Local Enterprise Partnership’s ambition for Norfolk and Suffolk. The strategy aims to make Norfolk and Suffolk:

⁷⁶ UK Parliament (2020). Agriculture Act 2020. (see <https://www.legislation.gov.uk/ukpga/2020/21/contents/enacted/data.htm>).

⁷⁷ Department for Environment, Food and Rural Affairs (2020). Agricultural Transition Plan 2021 to 2024.(see <https://www.gov.uk/government/publications/agricultural-transition-plan-2021-to-2024>)

⁷⁸ Carter Jonas (2015). Joint Town Centres & Retail Study. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/29-10-15-BaberghMid-Suffolk-TCRSFinal-Report.Final-Version-29.10.15.pdf>).

⁷⁹
⁸⁰ BMSDC (2020). Infrastructure Delivery Plan. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Infrastructure2020/BMSDC-IDP-Sept-2020.pdf>).

⁸¹ Norfolk & Suffolk Unlimited (2017). Economic Strategy. (see https://newanglia.co.uk/wp-content/uploads/2020/03/New-Anglia_Norfolk-Suffolk-Unlimited_Economic-Strategy-Brochure-1-1.pdf).

⁸² Norfolk & Suffolk Unlimited (2022). Norfolk & Suffolk Economic Strategy. (see <https://newanglia.co.uk/wp-content/uploads/2022/01/FINAL-Norfolk-and-Suffolk-economic-strategy-Jan-2022.pdf>).

- A higher-performing, clean, productive and inclusive economy.
- An inclusive economy with an appropriate and highly skilled workforce, where everyone benefits from clean economic growth.
- The place where high-growth businesses with aspirations choose to be.
- A well-connected place, locally, nationally and internationally.
- An international-facing economy with high-value exports.
- A centre for the UK's clean energy sector.
- A place with a clear, defined, ambitious offer to the world.

B.103 South East Inshore Marine Plan (2021)⁸³: This document introduces a strategic approach to planning within the inshore waters between Felixstowe, in Suffolk and near Dover, in Kent. It provides an evidence-based approach to inform decision-making by marine users and regulators on where activities might take place within the inshore marine plan area. The Plan will help to enhance and protect the marine environment and achieve sustainable economic growth, whilst respecting local communities both within and adjacent to the marine plan area. Babergh and Mid Suffolk District overlaps the South East Inshore Marine Plan area. In the case of Babergh, the overlap includes the tidal extent of the Rivers Stour and Orwell.

Current baseline

Business sectors and employment

B.104 The Office for National Statistics found a growth rate of 4.2% in 2020 for businesses in the East of England, which is the fourth highest region in the UK⁸⁴. Furthermore, 99.6% of registered businesses in the wider County of Suffolk are Small or Medium-Sized Enterprises (SMEs) with survival rates consistently better than the UK average⁸⁵.

B.105 Babergh and Mid Suffolk Districts are made up mainly of rural areas with a range of market and smaller towns, along with some industrial and enterprise sites. Therefore, the Districts contain a range of businesses such as agriculture, construction, technology and retail. The table below shows the breakdown of business stock in the Districts, which is predominantly characterised by Business and Professional Services in Babergh, and construction work in both Districts.

Table B.7: Business stock by sector in 2016⁸⁶

	Babergh		Mid Suffolk	
	Number of existing businesses		Number of existing businesses	
Agriculture	110	3%	220	6%
Business and Professional Services	1330	41%	1440	40%
Computing and Technology	110	3%	100	3%
Construction	420	13%	480	13%
Education	90	3%	100	3%
Energy, Waste and Utilities	20	1%	30	1%
Health and Care	200	6%	220	6%

⁸³ HM Government (2021). South East Inshore Marine Plan. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004493/FINAL_South_East_Marine_Plan_1_.pdf).

⁸⁴ Office for National Statistics (2018). Business Demography UK 2020. [Business demography, UK - Office for National Statistics \(ons.gov.uk\)](https://businessdemography.ons.gov.uk/)

⁸⁵ BMSDC (n.d.). Open for Business Strategy: Where and how do the District Councils make a difference. (see <https://www.midsuffolk.gov.uk/assets/Economic-Development/OpenForBusiness-Strategy-with-links.pdf>).

⁸⁶ Lichfields (2017). Ipswich Economic Area Sector Needs Assessment. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Ipswich-Economic-Area-Sector-Needs-Assessment-Sept-2017.pdf>).

	Babergh		Mid Suffolk	
	Number of existing businesses		Number of existing businesses	
Hospitality and Leisure	250	8%	210	6%
Manufacturing	230	7%	250	7%
Retail	250	8%	210	6%
Transport and Logistics	70	2%	120	3%
Wholesale	200	6%	240	7%
Total	3280		3620	

B.106 As of 2021, 75% (39,300) of the residents in Babergh District were economically active compared to 81% (47,600) in Mid Suffolk. The regional average was 78% and the national average was 75.1%⁸⁷. In Babergh, 8.4% of the economically active residents were self-employed compared to 10.7% in Mid Suffolk. In 2018, 61.3% of total employees were full-time and 38.7% were part-time in Babergh, whilst 68.6% were full-time and 31.4% were part-time in Mid Suffolk. In addition, 2.9% (1,200) of Babergh residents were unemployed and 2.3% (1,300) of Mid Suffolk residents. This is lower than the regional (3%) and national averages (3.9%).

B.107 In 2021, gross weekly pay in Babergh was around £574.90 compared to £590.80 in Mid Suffolk. The regional average is £628.60 and the national average is £613.10. Therefore, pay in both Babergh and Mid-Suffolk is below the national average⁸⁸.

B.108 The table below shows that, in terms of numbers of jobs, 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. In Mid Suffolk, administrative and support service activities are also an important source of employment.

Table B.8: Employee jobs by industry⁸⁹

	Babergh		Mid Suffolk	
	Employee jobs		Employee jobs	
Mining and Quarrying	0	0%	10	0%
Manufacturing	4,500	14.1%	5,000	13.5%
Electricity, Gas, Steam and Air Conditioning Supply	0	0%	50	0.1%
Water Supply; Sewerage, Waste Management and Remediation Activities	250	0.8%	350	0.9%
Construction	2,000	6.2%	4,500	12.2%
Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles	6,000	18.8%	5,000	13.5%
Transportation and Storage	1,250	3.9%	3,000	8.1%
Accommodation and Food Service Activities	3,000	9.4%	2,000	5.4%
Information and Communication	1000	3.1%	1000	2.7%

⁸⁷ BMSDC (2021-22). Annual Monitoring Report. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/AMR/Babergh-and-Mid-Suffolk-AMR-2021-2022.pdf>).

⁸⁸ Office for National Statistics (2021). Labour Market Profile for Babergh and Mid Suffolk, both separate webpages. (see <https://www.nomisweb.co.uk/reports/lmp/la/1946157239/report.aspx?town=barergh#tabearn>;

<https://www.nomisweb.co.uk/reports/lmp/la/1946157242/report.aspx?town=mid%20suffolk#tabearn>).

⁸⁹ NOMIS (2021). Employee Jobs by Industry. (see <https://www.nomisweb.co.uk/reports/lmp/la/1946157239/report.aspx?town=Babergh#tabempunemp>).

	Babergh		Mid Suffolk	
	Employee jobs		Employee jobs	
Financial and Insurance Activities	350	1.1%	400	1.1%
Real Estate Activities	400	1.2%	350	0.9%
Professional Scientific and Technical Activities	2,500	7.8%	2,500	6.8%
Administrative and Support Service Activities	2,250	7.0%	3,000	8.1%
Public Administration and Defence; Compulsory Social Security	250	0.8%	1,250	3.4%
Education	4,000	12.5%	3,000	8.1%
Human Health and Social Work Activities	3,000	9.4%	3,000	8.1%
Arts, Entertainment and Recreation	900	2.8%	800	2.2%
Other Services Activities	500	1.6%	700	1.9%

Economic growth challenges and priorities

B.109 Babergh and Mid Suffolk released an "Open for Business Strategy" in 2018 which communicates the Districts' approach in supporting economic growth and helping businesses, communities and their broad network of partners. The report aims to encourage collaboration when tackling both short-term and long-term aspirations.

B.110 The priority in Babergh is to "shape, influence and provide the leadership to enable growth while protecting and enhancing our environment". In Mid Suffolk, the priority is to "lead and shape the local economy by promoting and helping to deliver sustainable economic growth, which is balanced with respect for wildlife, heritage and the natural and built environment".

B.111 A Local Enterprise Partnership for Norfolk and Suffolk, New Anglia, has 10 enterprise zones, 2 of which are in Babergh and Mid Suffolk⁹⁰. These are Stowmarket Enterprise Park, Mill Lane and Sproughton Enterprise Park, Sproughton. A Food Enterprise Zone known as Jimmy's Farm site is also present within BMSDC.

B.112 The main employment sites and enterprise zones are shown in **Figure B.4**.

B.113 The main issues impacting on growth in Babergh and Mid Suffolk are as follows⁹¹:

- Several large local strategic sites (including designated Enterprise Zone sites) have potential for significant job generation but need support, such as the development of infrastructure, services and utilities.
- Limited premises options for SMEs, including starter, incubator, clustering businesses and then scaling-up 'graduation' space.
- Slow broadband speeds and limited mobile coverage in rural areas.
- Lower skills and educational attainment than regional or national averages.
- High levels of outward commuting partially due to the imbalance of housing and jobs. Both authorities also fall within the Ipswich Travel to Work Area.
- Low levels of entrepreneurship and business start-up, but all also fewer business failures.
- Market towns that need help improving their vitality, so the towns become designation areas and play to their strengths.

⁹⁰ BMSDC (n.d.). Enterprise Zones. (see <https://www.babergh.gov.uk/business/economic-development/space-to-innovate-enterprise-zones/>).

⁹¹ BMSDC (n.d.). Open for Business Strategy: Where and how do the District Councils make a difference. (see <https://www.babergh.gov.uk/assets/Economic-Development/OpenForBusiness-Strategy-with-links.pdf>).

- Limited access to higher education and adult learning services and support across the wider area however, this is improving.
- Limited rural infrastructure, particularly road and digital networks, as well as access to skilled individuals with specialist and higher-level skills or leadership affect the ability to recruit young people.
- Place of interest that have inherent barriers to growth and development, such as Areas of Outstanding Natural Beauty (AONB) or Sites of Special Scientific Interest (SSSI).

Town centres and retail

B.114 The current Town Centre and Retail Study for Babergh and Mid Suffolk was published in September 2015. According to the study, there has been a decline in shopping centre consumer patterns.

B.115 BMSDC have been collecting data on shop occupancy and vacancy rates in their key towns and service centres for some years. The results are set out in the below table and shows highest vacancy rates to be in Needham Market, followed by Sudbury.

Table B.9: Town centre vacancy rates

Town Centres	No. of Shops			Floorspace (m ²)		
	Total	Vacant	% Vacant	Total	Vacant	% Vacant
Sudbury (2019)	260	19	7.31%	42,899	2,996	6.98%
Hadleigh (2019)	114	5	4.39%	23,129.5	438	1.89%
Stowmarket (2019)	47	0	0%	8,117.7	112	0%
Needham Market (2019)	79	8	10.13%	8,117.7	112	0%

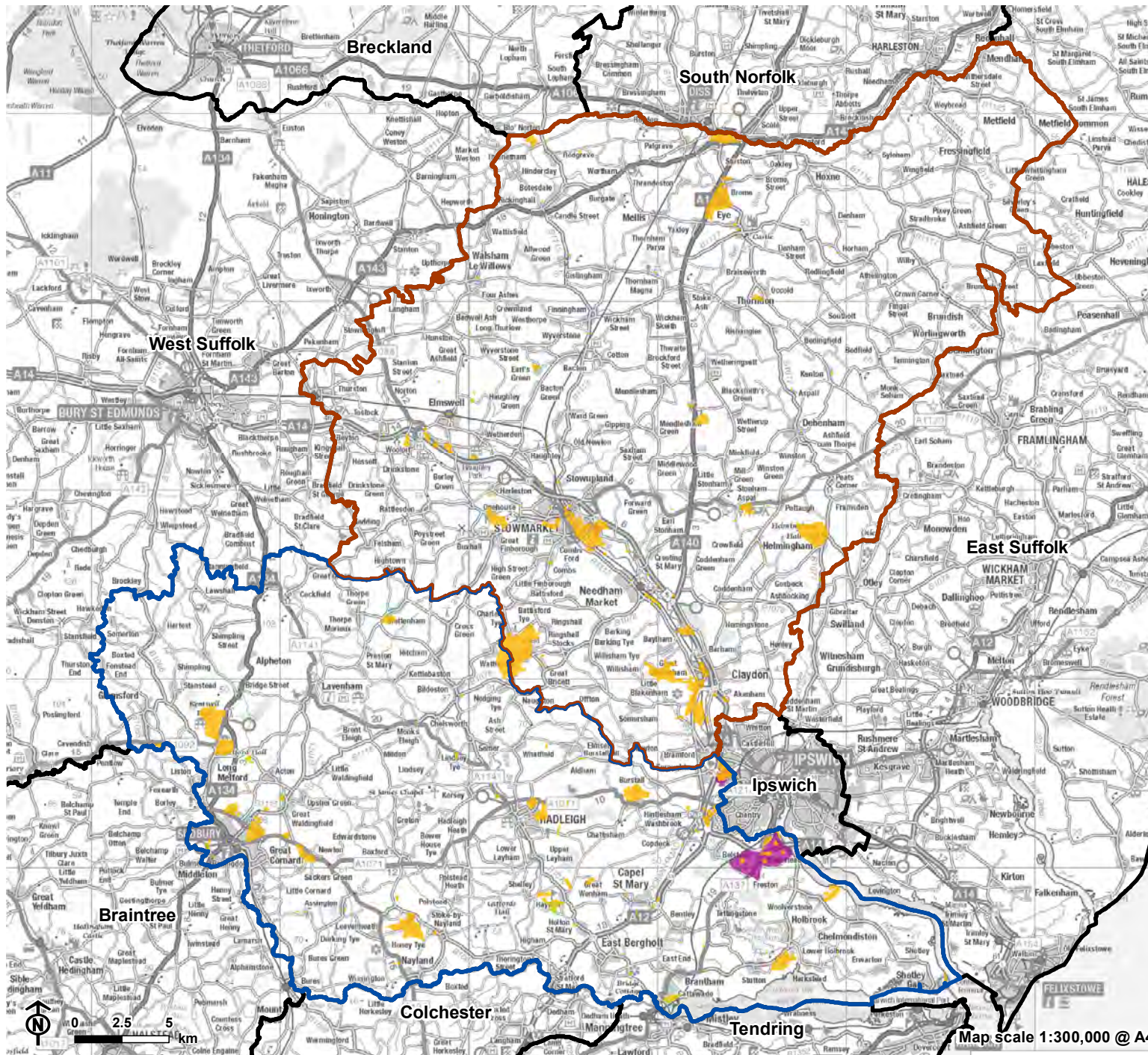


**Figure B.4: Employment Areas and
Enterprise Zones**

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- Employment site
- Enterprise zone

Transport, Air Quality and Noise

Policy context

International

B.116 The Trans-European Networks (TEN)⁹²: Created by the European Union by Articles 154-156 of the Treaty of Rome (1957), with the stated goals of the creation of an internal market and the reinforcement of economic and social cohesion. These include the Trans-European Transport Networks (TEN-T), which includes High Speed 1, and the Trans-European Telecommunications Networks (eTEN).

National

B.117 The NPPF (2021)⁹³ requires that “transport issues should be considered from the earliest stages of plan-making”. The scale, location and density of development should reflect “opportunities from existing or proposed transport infrastructure”. To help reduce congestion and emissions and improve air quality and public health the planning system should focus significant development “on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.” The draft revised framework also requires that planning policies support an appropriate mix of uses across an area to further help reduce the need to travel as well as the provision of high-quality walking and cycling network.

B.118 While the framework promotes the use and development of sustainable transport networks it also requires that “where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development” should be identified and protected.

B.119 The NPPF also states that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued soil and the economic and other benefits of the best and most versatile agricultural land. Policies should also prevent new and existing development from “*contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution.*”

B.120 The NPPF is supported by planning practice guidance relating to:

- **Transport evidence bases in plan making and decision taking (2015)**⁹⁴: Provides guidance to help local authorities assess and reflect transport needs in Local Plan making.
- **Travel Plans, Transport Assessments and Statements (2014)**⁹⁵: Provides advice on when Transport Assessments and Transport Statements are required, and what they should contain.
- A target on ambient PM2.5 concentrations.
- **Air quality (2019)**⁹⁶ provides guidance on air quality considerations planning needs to take into account.

B.121 The Levelling Up the United Kingdom White Paper (2022)⁹⁷ sets out how the UK Government will spread opportunity more equally across the UK. It comprises 12 UK-wide missions to achieve by 2030, which includes the following key mission relating to transport and travel:

- By 2030, local public transport connectivity across the country will be significantly closer to the standards of London, with improved services, simpler fares and integrated ticketing.

⁹² European Commission (2019). Trans-European Networks – Guidelines. (see http://www.europarl.europa.eu/ftu/pdf/en/FTU_3.5.1.pdf).

⁹³ Ministry of Housing, Communities and Local Government (2021). National Planning Policy Framework [online]. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf).

⁹⁴ Ministry of Housing, Communities and Local Government (2015). Transport evidence bases in plan making and decision taking. (see <https://www.gov.uk/guidance/transport-evidence-bases-in-plan-making-and-decision-taking>)

⁹⁵ Ministry of Housing, Communities and Local Government (2014). Travel Plans, Transport Assessments and Statements. (see <https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements>).

⁹⁶ Ministry of Housing, Communities and Local Government (2019). Air quality. (see <https://www.gov.uk/guidance/air-quality--3>).

⁹⁷ Department for Levelling Up, Housing and Communities (2022). White Paper Levelling Up the United Kingdom. : (see <https://www.gov.uk/government/publications/levelling-up-the-united-kingdom>)

B.122 National Planning Practice Guidance (PPG)⁹⁸: Reiterates the requirement for local planning authorities to undertake an assessment of the transport implications of reviewing their Local Plan.

B.123 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland⁹⁹: Sets out a way forward for work and planning on air quality issues by setting out the air quality standards and objectives to be achieved. It introduces a new policy framework for tackling fine particles and identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives. The objectives of the Strategy are to:

- Further improve air quality in the UK from today and long term.
- Provide benefits to health quality of life and the environment.

B.124 Department for Transport, The Road to Zero (2018)¹⁰⁰: Sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

B.125 Department for Transport, Road Investment Strategy 2: 2020-2025¹⁰¹: The second Road Investment Strategy sets a long-term strategic vision for the network. It specifies the performance standards Highways England must meet, lists planned enhancement schemes expected to be built and states the funding that will be made available by the DfT during the second Road Period, which covers 2020/21 to 2024/25.

B.126 A Green Future: Our 25 Year Plan to Improve the Environment¹⁰²: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. The area of relevance to this chapter is: increasing resource efficiency and reducing pollution and waste. Actions that will be taken as part of this key areas are as follows:

- Increasing resource efficiency and reducing pollution and waste:
 - Reduce pollution by tackling air pollution in our Clean Air Strategy and reduce the impact of chemicals.

B.127 UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations¹⁰³: Sets out the Government's ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra-low emission vehicles (ULEVs), a £290 million National Productivity Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help local authorities to prepare Air Quality Action Plans and improve air quality, an £89 million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

B.128 Clean Air Strategy 2019¹⁰⁴: Sets out the comprehensive action that is required from across all parts of government and society to meet these goals. This will be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will support the creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms. The UK has set stringent targets to cut emissions by 2020 and 2030.

B.129 The Environment Act 2021¹⁰⁵ sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. It also establishes the Office for Environmental Protection

⁹⁸ Ministry of Housing, Communities & Local Government (last updated 1 October 2019). Planning Practice Guidance. (see <https://www.gov.uk/government/collections/planning-practice-guidance>).

⁹⁹ Department for Environment Food and Rural Affairs (2007). The Air Quality Strategy for England, Scotland, Wales and Northern Ireland. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf).

¹⁰⁰ Department for Transport (2018). The Road to Zero. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf).

¹⁰¹ REF

¹⁰² HM Government (2018). A Green Future: Our 25 Year Plan to Improve the Environment. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf).

¹⁰³ Department for Environment Food and Rural Affairs and Department for Transport (2017). UK plan for tackling roadside nitrogen dioxide concentrations. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-plan-overview.pdf).

¹⁰⁴ DEFRA (2019). Clean Air Strategy 2019. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf).

¹⁰⁵ HM Government (2021). Environment Act 2021 (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>).

which will act as an impartial and objective body for the protection and improvement of the environment. The Act sets out legislation which covers:

- Resource efficiency, producer responsibility, and the management, enforcement and regulation of waste;
- Local air quality management frameworks and the recall of motor vehicles etc; and
- Plans and proposals for water resources, drainage and sewerage management, storm overflows, water quality and land drainage.

B.130 Establishing the Best Available Techniques for the UK (UK BAT) (2022)¹⁰⁶ sets out a new framework that aims to improve industrial emissions and protect the environment through the introduction of a UK BAT regime. It aims to set up a new structure of governance with a new independent body in the form of Standards Council and the Regulators Group, consisting of government officials and expert regulators from all UK nations. It aims to also establish a new UK Air Quality Governance Group to oversee the work of the Standards Council and the delivery of the requirements under this new framework. It is anticipated that the BATC for the first four industry sectors will be published in the second half of 2023.

Sub-national

B.131 Suffolk's Local Transport Plan 2011-2031¹⁰⁷: is a two-part plan that is currently in the process of being reviewed. The first part sets out the 20-year strategy that highlights the Council's long-term ambitions for transport and the second part is a four year implementation plan demonstrating how the Council will address the issues identified in the longer-term transport strategy.

B.132 Babergh and Mid Suffolk Infrastructure Delivery Plan (2020)¹⁰⁸: Aims to consider all infrastructure needs to enable sustainable development and growth supporting residents, businesses, communities, the environment and individuals. A key objective is prioritising investment into strategic services and infrastructure. The report also considers collaboration of organisations to provide funding and the phasing of infrastructure may occur depending on the degree of growth.

B.133 Suffolk Travel Plan Guidance (2022)¹⁰⁹: promotes best practice in travel planning and consistency across Suffolk in support of national and local policy requirements. The guidance provides clarity to both stakeholders and developers involved in the planning process.

B.134 Suffolk Cycling Strategy (2014-2031)¹¹⁰: Reviews Suffolk's cycling landscape, sets 6 key strategies and outlines actions to help meet these strategies to achieve proposed outcomes. The report also outlines the delivery approach and governance of the strategy.

B.135 Suffolk Walking Strategy (2015-2020)¹¹¹: The aim of the strategy is to get more people to walk in Suffolk and walking should be a 'default' choice for journeys of 20 minutes walking time or less. The report sets out aims, actions and outcomes. The report also outlines the delivery approach and governance of the strategy.

Current baseline

B.136 The transport network of Babergh and Mid Suffolk is shown in **Figure B.7**.

Road network

B.137 The key components of the road network of Babergh and Mid Suffolk are:

¹⁰⁶ DEFRA (2022). Establishing the Best Available Techniques for the UK (UK BAT). (see <https://www.gov.uk/government/publications/establishing-the-best-available-techniques-for-the-uk-uk-bat/establishing-the-best-available-techniques-for-the-uk-uk-bat#current-situation>).

¹⁰⁷ Suffolk County Council (2019). Suffolk Local Transport Plan. (see <https://www.suffolk.gov.uk/roads-and-transport/transport-planning/transport-planning-strategy-and-plans/>).

¹⁰⁸ BMSDC (2020). Infrastructure Delivery Plan. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Infrastructure2020/BMSDC-IDP-Sept-2020.pdf>).

¹⁰⁹ Suffolk County Council (2022). Suffolk Travel Plan Guidance. (see <https://www.suffolk.gov.uk/asset-library/imported/2022-09-13-suffolk-travel-plan-guidance-third-edition-lo-res.pdf>).

¹¹⁰ Suffolk County Council (2014). Suffolk Cycling Strategy (2014-2031). (see <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-and-development-advice/20140619-Cycling-Strategy-booklet.pdf>).

¹¹¹ Suffolk County Council Suffolk Walking Strategy (2015). Active for Life: Suffolk Walking Strategy 2015-2020. (see https://www.healthysuffolk.org.uk/uploads/Suffolk's_Walking_Strategy.pdf).

- The A14, which is an important corridor for moving goods as it connects the port of Felixstowe with the Midlands and the A1, via Ipswich, Bury St Edmunds, Cambridge, and Huntingdon. Stowmarket and Needham Market are located just to the south of this route, which acts as a bypass to these two towns.
- The A12, which connects London with Chelmsford, Colchester and Ipswich and on to the coastal towns of Lowestoft and Great Yarmouth. The A12 passes through the south eastern part of Babergh but does not connect into any of the market towns in the District.
- The A140, which connects the A14 just north of Ipswich with Norwich via Diss. Eye is located just to the east of this route.
- The A134, which connects Colchester and Braintree (the latter via the A131) with Bury St Edmunds, via Sudbury.

B.138 Hadleigh does not lie on the strategic road network, although it is on the A1071, which links Sudbury with Ipswich, and the A1141 to Bury St Edmunds. In addition, the A1120 links Stowmarket and Needham Market with the A12 to the east as a cross-country route rather than going via the A14 around Ipswich.

B.139 The remainder of the road network in the two Districts comprises primarily B roads and rural roads.

Traffic growth and road projects

B.140 A recent modelling report¹¹² tested the Council's core set of development assumptions across the District made in the Local Plan. The modelling shows future traffic growth for 2026 and 2036, as a result of changing patterns of travel behaviour and predicting future traffic impacts. The growth assumptions for the modelling consider population growth and specific development locations, as well as car ownership and relative vehicle operating costs.

B.141 The results show that whilst many junctions may be close to or exceed capacity in 2026 and 2036, there are also many parts of the network that will operate well within their theoretical capacity. For junctions where the volume to capacity (V/C) is shown to approach or exceed operational capacity, the individual development proposals assessed within the model would, as part of their planning applications, need to consider additional measures to help mitigate any impact.

B.142 In Babergh District and to the south-west of Ipswich, the Beagle roundabout (A1071/B1113/Swan Hill) is shown to have overall capacity issues, with multiple arms over-capacity in both 2026 and 2036. The A1071/Hadleigh Road signalised junction is highlighted as having capacity issues in both forecast years. Sudbury is shown to generally operate within capacity within the town itself in both forecast years. However, the southern A131 approach to/from Sudbury and A134/A1071 junction shows capacity issues in both forecast years, going over capacity in 2036. Brantham is shown to have capacity issues in both forecast years, with the A137 over capacity in both forecast years.

B.143 In Mid Suffolk District, the A140 corridor is shown to have capacity issues at multiple locations including the A140/A1120 staggered crossroads and A140/Workhouse Road/Stoke Road junction. Stowmarket is shown to generally operate within capacity in both forecast years, though isolated link approaches to Gipping Way and Ipswich Road are shown to have capacity issues in both forecast years.

B.144 The highway schemes outlined below are due to be in place in BMSDC by 2026 and 2036, which will help reduce congestion across both Districts:

- **Chilton Woods access road:** access road between A134 Springlands Way (new roundabout) and Acton Lane (new priority junction).
- **A1071/Swan Hill roundabout:** capacity improvements.
- **A1071/Hadleigh Road signals:** capacity improvements.
- **A1071/Poplar Lane:** signalisation as part of access arrangements for Wolsey Grange.
- **A1214 London Road:** new signalised junction part of access arrangements for Wolsey Grange.
- **A140 Eye Airfield:** roundabout improvements.

¹¹² WSP (2020). Ipswich Strategic Planning Area Local Plan Modelling. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Transport-Modelling/2020/200115-SPA-MR7-SCC-Hwy-Results-Report.pdf>).

B.145 A number of consultation responses received in response to the SA Scoping Report consulted on between March and April 2020 also raised concern over HGV movements in rural locations, particularly around Eye and Stradbroke primarily in relation to the poultry sector.

Public transport network

B.146 Public transport is limited in the Districts. However, there are buses and trains that operate. Suffolk County Council has a bus and train network map which shows all possible routes¹¹³.

B.147 In Babergh, trains go from Sudbury out of the District to Marks Tey. Marks Tey railway station is on the Great Eastern Main Line and is a junction for the Sudbury Branch Line to Sudbury. You can change at Marks Tey to go to London Liverpool Street. Trains can also be taken from Ipswich railway station into London Liverpool Street.

B.148 In Mid Suffolk, trains go from Ipswich to Needham Market, Stowmarket, Elmswell, Thurston and Diss, and on to either Norwich or Bury St Edmunds and Cambridge. Direct trains to London are limited to Stowmarket only.

B.149 There are also bus services which provide a range of routes and connect the main towns, villages and centres within the Districts. However, these services are often irregular and limited¹¹⁴.

B.150 The Councils support a "Connecting Communities" initiative that collects residents from their homes and connects them with appropriate bus or train services¹¹⁵.

Commuting patterns and travel behaviour

B.151 The Districts' residents rely heavily on cars to get around and access employment, education, amenities and services, partly as a result of living in more isolated rural areas. There are many different commuting routes within the Districts and individuals commute in and out of the Districts from surrounding areas.

B.152 Many residents that live in Mid Suffolk commute into Ipswich. Residents from all over Babergh and Mid Suffolk, including Ipswich Town commute, into London¹¹⁶.

B.153 As set out in **Figure B.5**, around 11,622 individuals commute into Babergh District, whilst 18,162 commute out of the District. Therefore, overall, there are 6,540 less people in Babergh District as a result of commuting¹¹⁷. The commuting figures show the strong relationship that Babergh has with Ipswich in particular, both for commuting inwards and outwards.

B.154 According to **Figure B.6**, Mid Suffolk is similar with 13,961 individuals commuting into the District and 20,834 commuting out of the District. Overall, there are 6,873 less individuals in Mid Suffolk District as a result of commuting¹¹⁸. Mid Suffolk also has a strong relationship with Ipswich, but the District to which most people commute is West Suffolk (which contains Bury St Edmunds).

B.155 Whilst there is commuting between Babergh and Mid Suffolk, the overall numbers of journeys are not as high as they are between the two Districts and Ipswich and West Suffolk.

¹¹³ Suffolk County Council (2020). Public Transport Map. (see <https://www.suffolkonboard.com/buses/timetables/>).

¹¹⁴ Suffolk County Council (2022). Bus timetables. (see <https://www.suffolkonboard.com/buses/timetables/>).

¹¹⁵ Suffolk County Council (2022). Connecting Communities. (see <https://communities.suffolkonboard.com/my-area/mid-suffolk/>).

¹¹⁶ DataShine Commute (2011). (see <https://commute.datashine.org.uk/#mode=train&direction=both&msoa=E02004447&zoom=11&lon=0.8279&lat=52.0588>).

¹¹⁷ NOMIS (2011). Location of usual residence and place of work by sex. (see <https://www.nomisweb.co.uk/census/2011/wu01uk/chart>).

¹¹⁸ NOMIS (2011). Location of usual residence and place of work by sex. (see <https://www.nomisweb.co.uk/census/2011/wu01uk/chart>).

Figure B.5: Location of usual residence and place of work in Babergh¹¹⁹

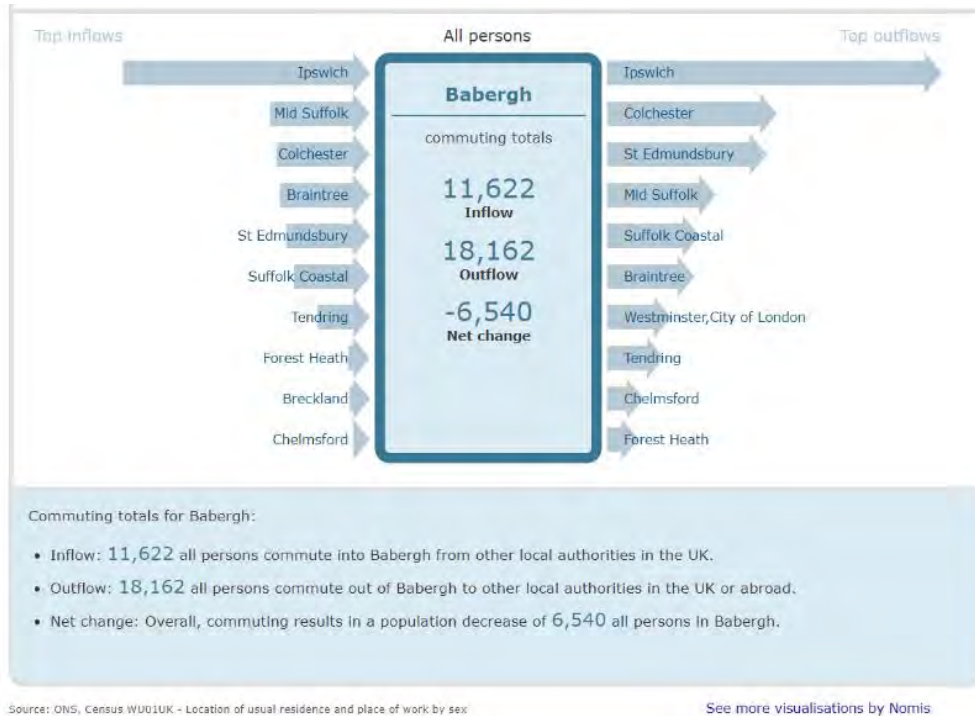
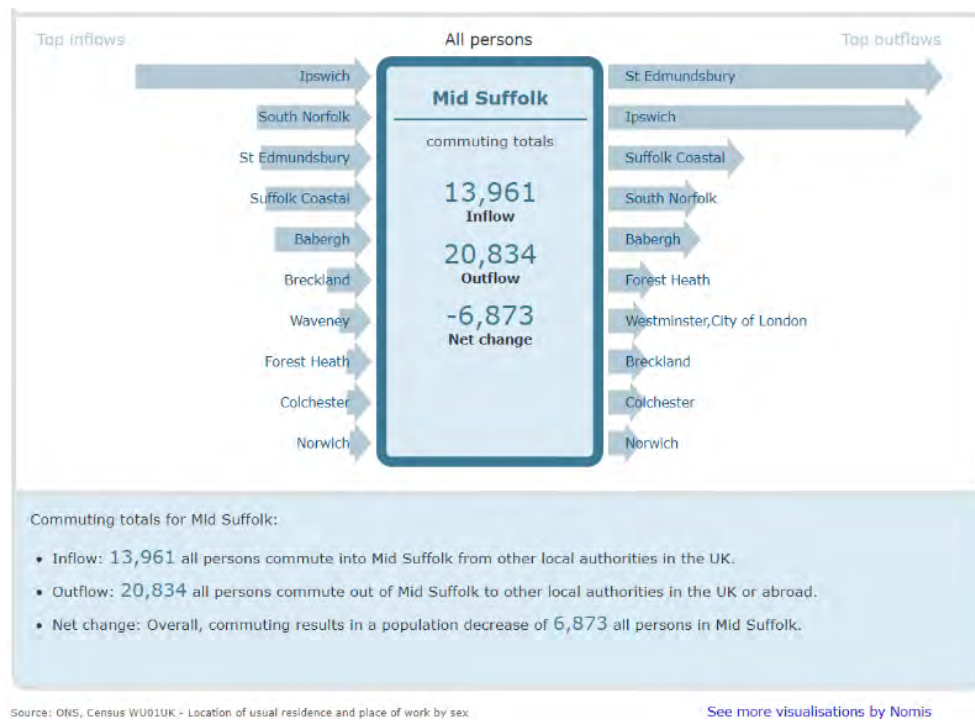


Figure B.6: Location of usual residence and place of work in Mid Suffolk¹²⁰



¹¹⁹ NOMIS (2011). Location of usual residence and place of work by sex. (see <https://www.nomisweb.co.uk/census/2011/wu01uk/chart>).

¹²⁰ NOMIS (2011). Location of usual residence and place of work by sex. (see <https://www.nomisweb.co.uk/census/2011/wu01uk/chart>).

Air quality and noise

Air quality

B.156 Industrial activity in the Districts has very few large industrial processes and is therefore light in nature meaning it has relatively little impact on air quality. In 2018, there were no new sources of significant industrial emissions in the Districts and a number of small planning applications were assessed for air quality purposes.

B.157 The most significant source of air pollution is from transport. Air quality is tested annually throughout the Districts. The main pollutant of concern is Nitrogen Dioxide which comes from road traffic emissions and monitoring has been conducted to measure concentrations.

B.158 In Babergh District, results found that Cross Street, Sudbury had concentrations of Nitrogen Dioxide that are higher than the health based annual mean Air Quality Objective. As a result, an Air Quality Management Area (AQMA) was designated in 2008 in this area. In 2018, the three monitoring locations in the AQMA exceeded the Objective for the last 5 years. The main roads within the Districts (A12, A14 and A140) and the railway between London and Norwich have not been found to have significant poor air quality.

B.159 Due to the high levels of Nitrogen Dioxide in Cross Street, an Air Quality Action Plan has been produced which will help reduce the concentration of Nitrogen Dioxide. There are two parking bays along the street which allow vehicles to park and when either bay is occupied cars have to slow down to allow cars to pass on the other side and often a queue builds up. Queuing and accelerating lead to an increase in concentrations of Nitrogen Dioxide. Babergh District has been working with Suffolk County Council Highways Department to pursue experimental removal of on-street parking bays and was predicted to start in early 2020. In Mid Suffolk, monitoring has not historically shown exceedances of the Objective at exposure locations, (e.g. schools, hospitals, care homes and residential properties) and there are no designated AQMAs.

B.160 AQMAs are also present in neighbouring authorities:

■ West Suffolk Council:

- Newmarket AQMA – The designated area incorporates Old Station Road from the Clock Tower roundabout to the junction with Rous Road, Newmarket, Suffolk.
- Great Barton AQMA – The designated area incorporates Gatehouse Cottage and 1 to 8 The Street (A143), in the Parish of Great Barton, Suffolk.
- Sicklesmere Road, Bury St Edmunds AQMA: The designated area incorporates 2 and 7 Sicklesmere Road and 28 Southgate House, Rougham Road, in the Parish of Bury St Edmunds (Southgate Ward)

■ Colchester Borough Council:

- Area 1 - Central Corridors - High St Colchester, Head St, North Hill, Queen St, St Botolphs St, St Botolphs Circus, Osbourne St, Magdalen St, Military Rd, Mersey Rd, Brook St, East St and St Johns Street.
- Area 2 - East Street and the adjoining lower end of Ipswich Road – East Street and Ipswich Road.
- Area 4 - Lucy Lane North, Stanway – Lucy Lane North, Stansway.

■ East Suffolk Council:

- AQMA Order No. 1 2006 – Woodbridge – Properties on the Western side of the thoroughfare and Melton Hill arm of the junction with Lime Kiln Quay Road, in Woodbridge, Suffolk.
- The Suffolk Coastal District Council Air Quality Management Area No 3 – The designated area incorporates the four properties situated within 1-5 Long Row, Main Road, in Stratford St Andrew, Suffolk.

■ Ipswich Borough Council:

- Ipswich AQMA No.1 – An area encompassing the land in and around the junction of Norwich Road, Chevallier Street and Valley Road, extending along Chevallier Street to beyond the junction with Waterloo Road.

- Ipswich AQMA No.2 – An area from the junction with Peel Street, extending along Crown Street, St Margarets Street and St Helens Street to the junction with Palmerston Road, and from St Margarets Street extending up Woodbridge Road to just beyond the junction with Argyle Street.
- Ipswich AQMA No.3 – An area following the route of the Star Lane / Key Street / College Street gyratory clockwise from the junction with Lower Orwell Street, extending along Star Lane, Grimwade Street, Fore Street, Salthouse Street, Key Street and College Street, terminating at the junction with Bridge Street.
- Ipswich AQMA No.4 – Incorporating the Bramford Road/Yarmouth Road/Chevallier Street junction and part of Chevallier Street.
- Ipswich AQMA No.5 – An area incorporating the land in or around St. Matthews Street / Norwich Road between the Civic Drive roundabout and Bramford Road.

B.161 It is recognised that air quality does not respect administrative or political boundaries and that there is potential for the occurrence of cross boundary impacts on neighbouring AQMAs. Development in BMSDC is likely to impact the AQMAs present in neighbouring authorities as a result of traffic growth, particularly the ones located within close proximity to BMSDC, such as Bury St Edmunds and Great Barton in West Suffolk, and the five AQMAs present within Ipswich – all of which have been designated as a result of Nitrogen Dioxide levels. Development in BMSDC is especially likely to impact the Ipswich AQMAs because a large number of people commute to/from Ipswich in Babergh and Mid Suffolk Districts.

B.162 Figure B.8 to Figure B.10 show air quality in the two Districts and surrounding areas, and where AQMAs have been designated for Nitrogen Dioxide pollution. These clearly show that air pollution follows the main road transport corridors, with concentrations in the urban areas, even though pollution thresholds are not exceeded in most locations.

Noise

B.163 Noise is a common problem arising from transport, and studies have shown it can have major negative direct and indirect effects on health and well-being, on quality of life and on wildlife. Exposure to noise can increase stress levels, disrupt communications and disturb sleep. There is scope for transport's noise emissions to be reduced, by cutting the number of cars on the road, low-noise road surfacing, noise barriers, and many other measures.

B.164 Noise pollution is not a major issue in Babergh and Mid Suffolk, and again tends to be associated with the main transport corridors as shown in Figure B.11.

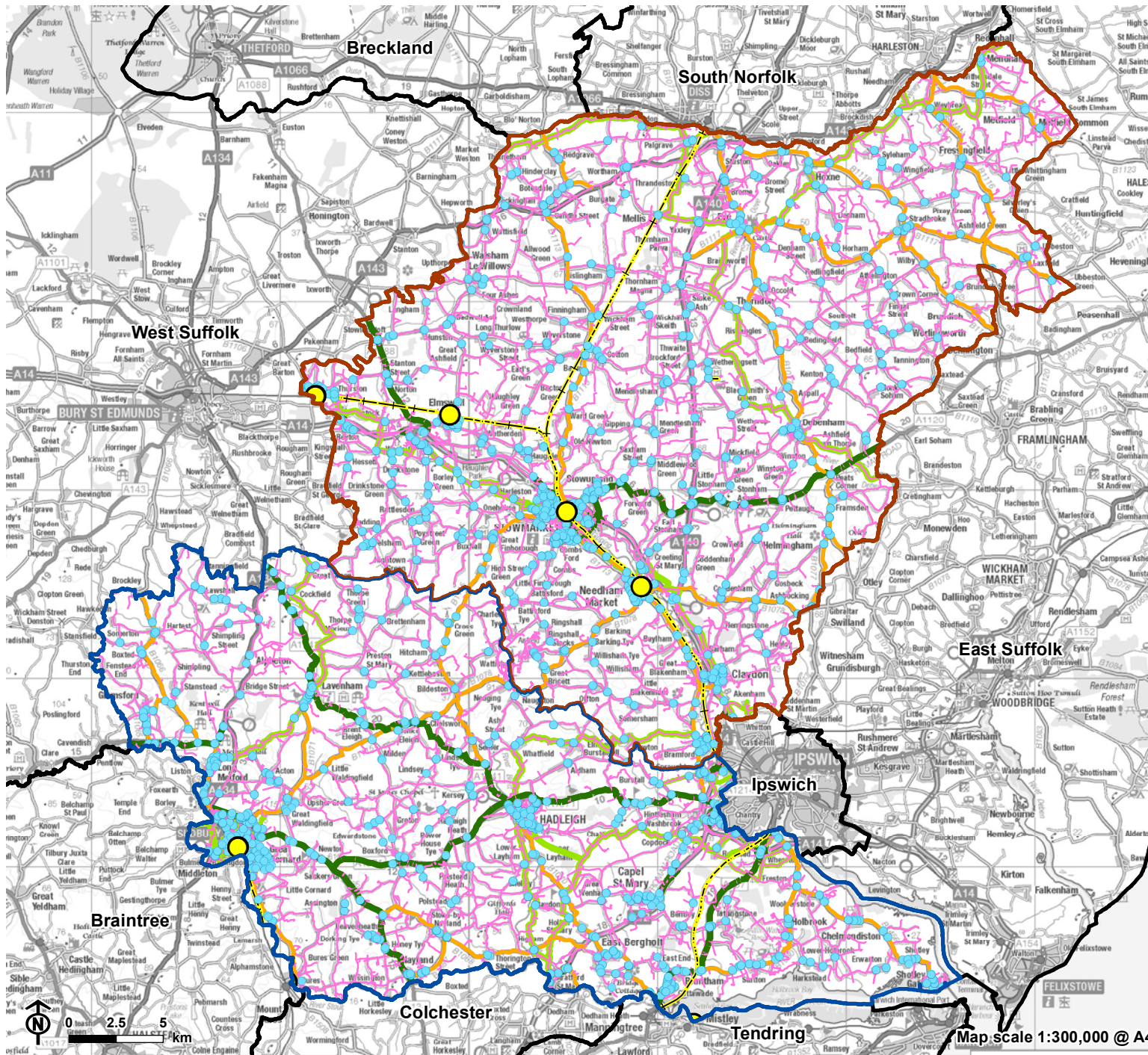


Figure B.7: Transport Network

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- Bus stop
- Railway station
- +— Railway
- A road
- B road
- Other road
- Local and national cycle routes

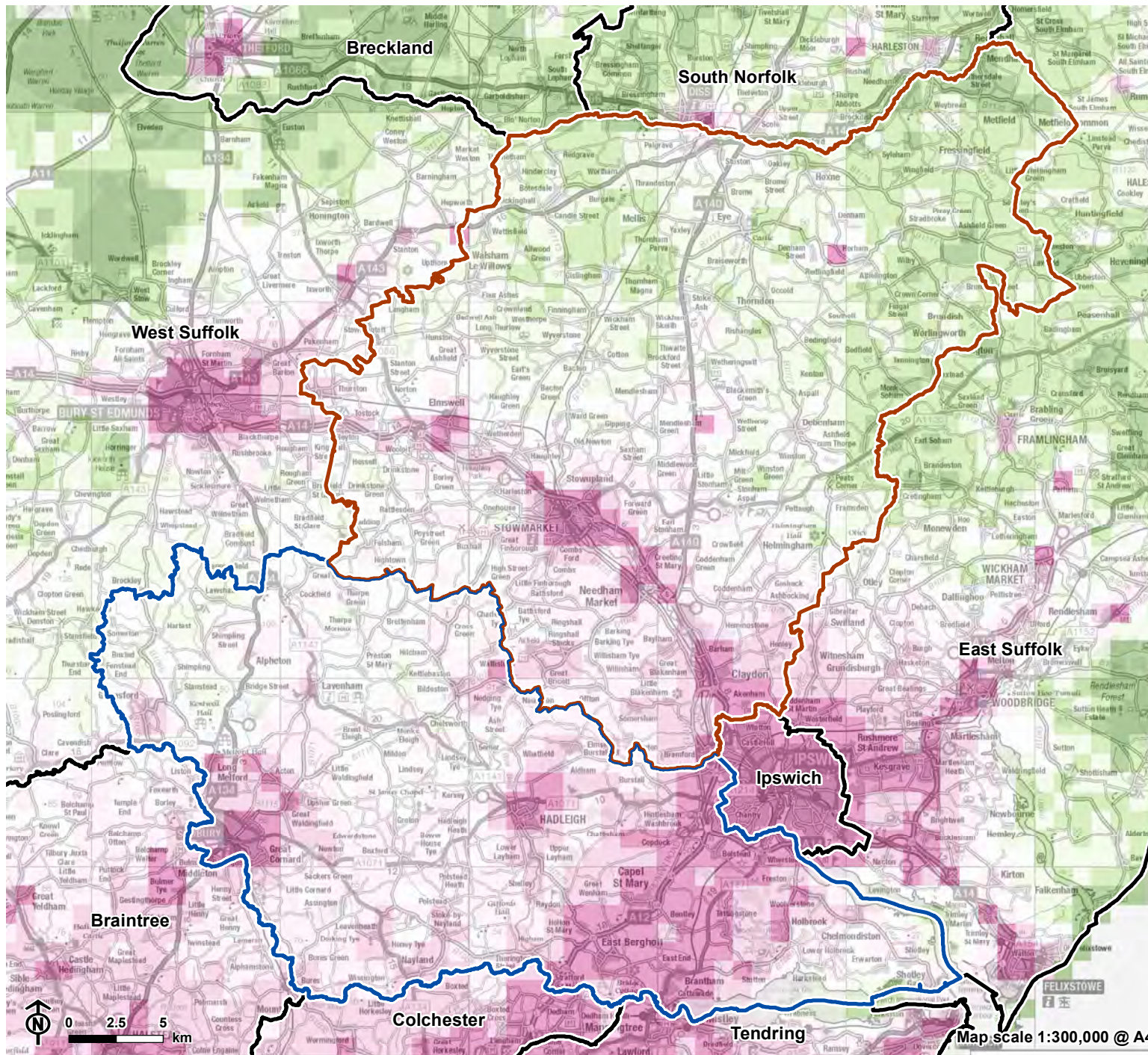
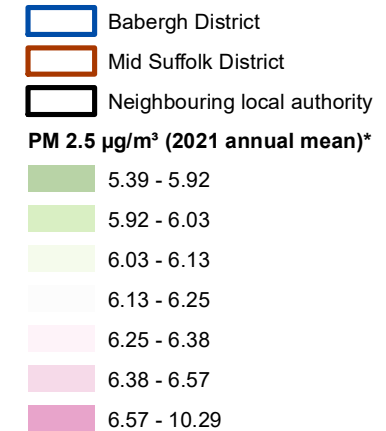


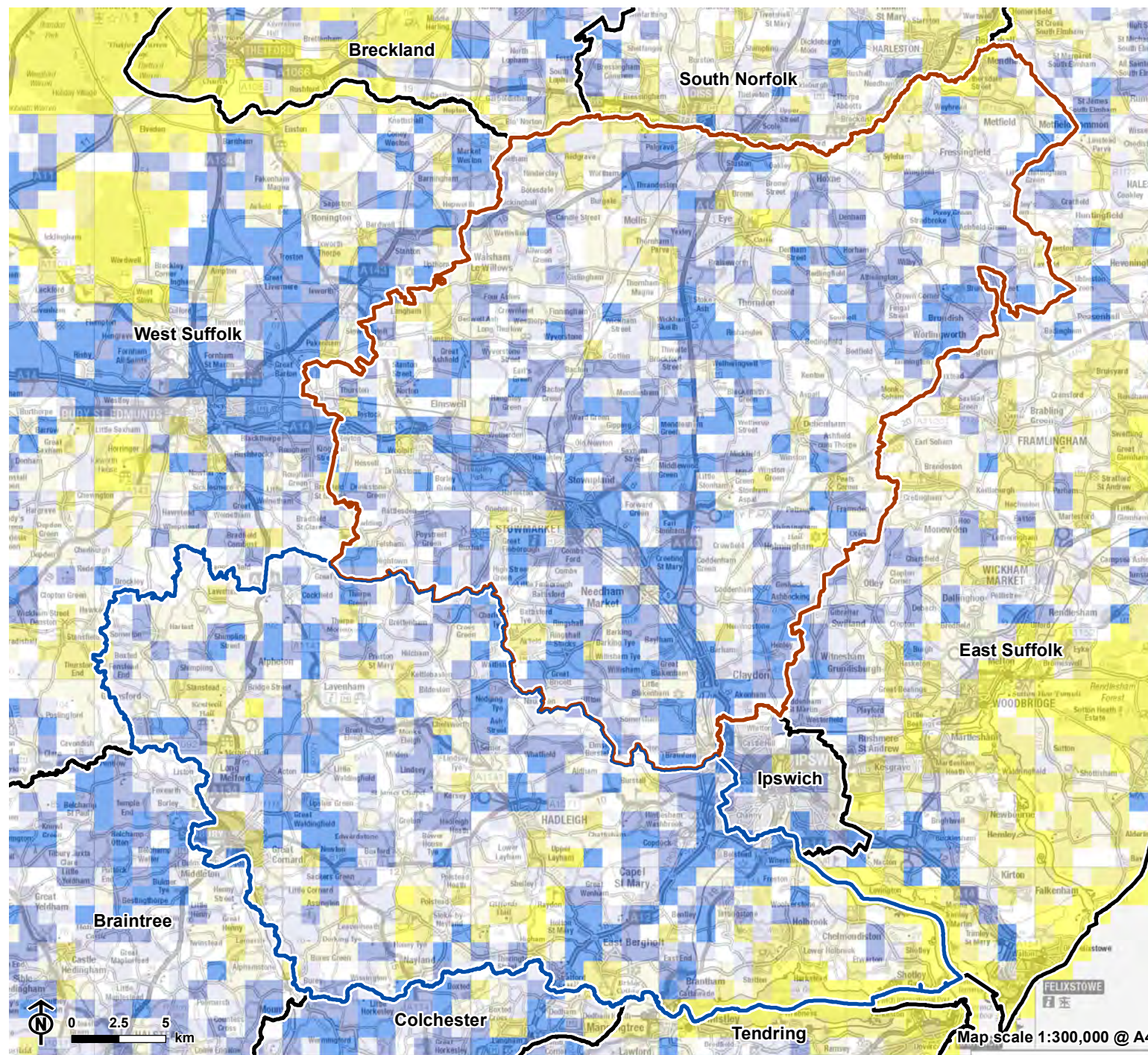
Figure B.9: Air Quality: PM 2.5



*Notes:
PM2.5 concentrations in gravimetric units.
European Directive annual mean not to exceed
25 $\mu\text{g}/\text{m}^3$. Estimated 2021 background air
pollution maps (base year 2020). Total annual
mean concentrations based on 1 km x 1 km grid
squares are provided.

PM2.5 concentration is displayed using quantile
classification. Each class contains an equal
number of features.

Figure B.10: Air Quality: PM10



*Notes:
PM10 concentrations in gravimetric units.
European Directive annual mean not to exceed $40 \mu\text{g}/\text{m}^3$. Estimated 2021 background air pollution maps (base year 2020). Total annual mean concentrations based on 1 km x 1 km grid squares are provided.

PM10 concentration is displayed using quantile classification. Each class contains an equal number of features.

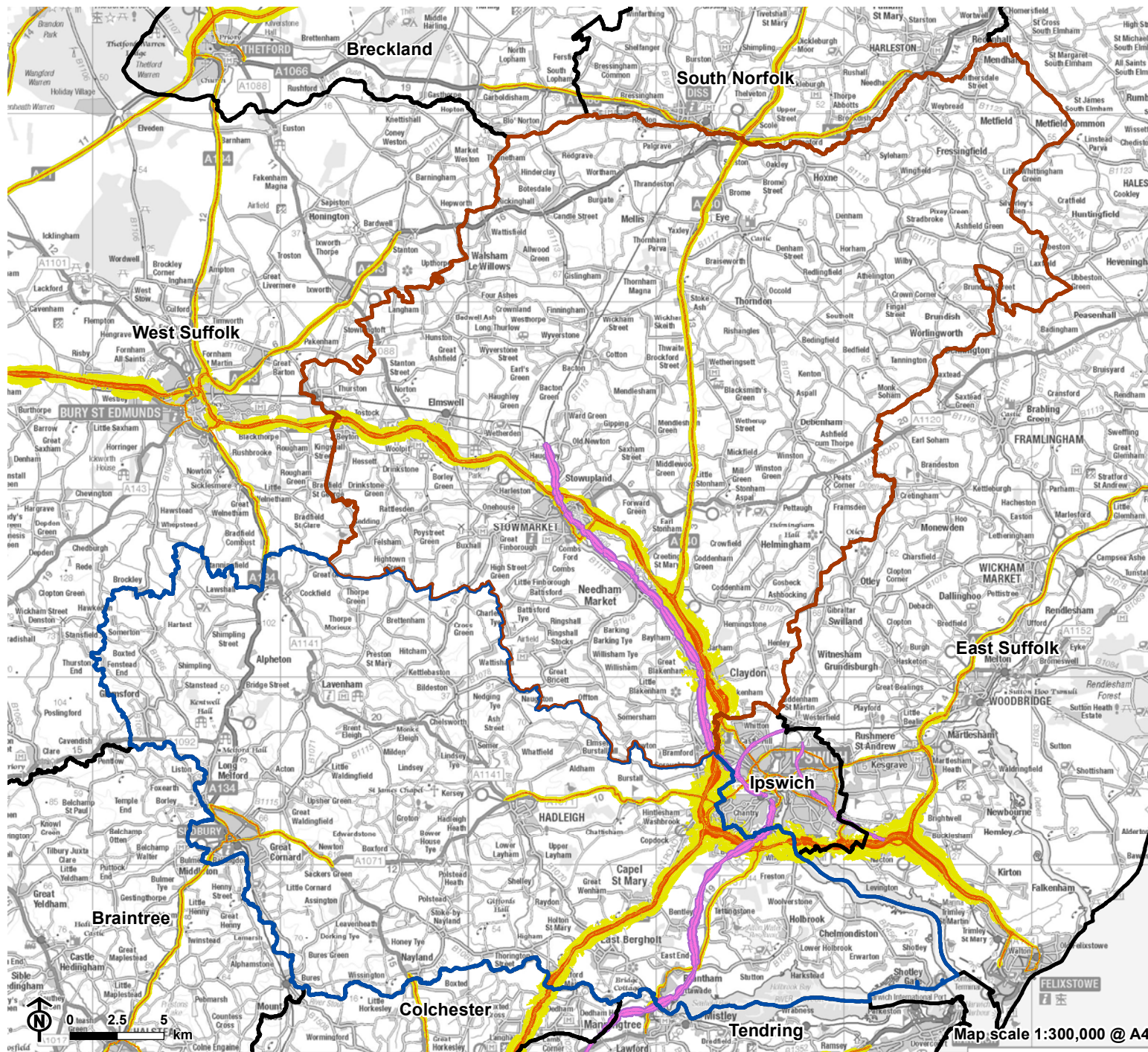


Figure B.11: Noise Pollution

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- Road noise
 - A-weighted equivalent continuous sound level daytime - 16 hour (0700-2300) exceeding 59.9dB
 - A-weighted equivalent continuous sound level at night (2300-0700) exceeding 54.9dB
- Rail noise
 - A-weighted equivalent continuous sound level daytime - 16 hour (0700-2300) exceeding 59.9dB
 - A-weighted equivalent continuous sound level at night (2300-0700) exceeding 54.9dB

Land and Water Resources

Policy context

International

B.165 The **2030 Agenda for Sustainable Development (2015)**¹²¹: This initiative, adopted by all United Nations Member States, provides a shared blueprint for peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all. Relevant to this topic are:

- SDG 6: Clean Water and Sanitation
- SDG 14: Life Below Water.
- SDG 15: Life on Land.

National

B.166 The **NPPF (2021)**¹²² states that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued soil and the economic and other benefits of the best and most versatile agricultural land. Policies should also prevent new and existing development from “*contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution.*”

B.167 The document also requires that strategic policies should seek to make the most effective use of land in meeting local requirements making as much use as possible of previously developed or ‘brownfield’ land. Furthermore, policies should “*support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land*”.

B.168 The NPPF is supported by planning practice guidance relating to:

- **Effective use of land (2019)**¹²³ provides guidance on making effective use of land, including planning for higher density development.
- **Green Belt (2019)**¹²⁴ provides advice on the role of the Green Belt in the planning system, removal of land from the Green Belt and compensatory improvements.
- **Land affected by contamination (2019)**¹²⁵ outlines guiding principles on how planning can deal with land affected by contamination.
- **Land stability (2019)**¹²⁶ sets out advice on how to ensure that development is suitable to its ground condition and how to avoid risks caused by unstable land or subsidence.
- **Natural environment (2019)**¹²⁷ highlights key issues in implementing policy to protect and enhance the natural environment, agricultural land, soils and brownfield land of environmental value, green infrastructure, biodiversity, geodiversity, ecosystems and landscapes.
- **Water supply, wastewater and water quality (2019)**¹²⁸ advises on how planning can ensure water quality and the delivery of adequate water and wastewater infrastructure.

¹²¹ United Nations Department of Economic and Social Affairs (2015). The 2030 Agenda for Sustainable Development. [Online]. (see <https://sdgs.un.org/2030agenda>).

¹²² Ministry of Housing, Communities and Local Government (2021). National Planning Policy Framework [online]. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf).

¹²³ Ministry of Housing, Communities and Local Government (2019). Effective use of land. (see <https://www.gov.uk/guidance/effective-use-of-land>)

¹²⁴ Ministry of Housing, Communities and Local Government (2019). Green Belt. (see <https://www.gov.uk/guidance/green-belt>)

¹²⁵ Ministry of Housing, Communities and Local Government (2019). Land affected by contamination. (see <https://www.gov.uk/guidance/land-affected-by-contamination>)

¹²⁶ Ministry of Housing, Communities and Local Government (2019). Land stability. (see <https://www.gov.uk/guidance/land-stability>)

¹²⁷ Ministry of Housing, Communities and Local Government (2019). Natural Environment. (see <https://www.gov.uk/guidance/natural-environment>)

¹²⁸ Ministry of Housing, Communities and Local Government (2019). Water supply, wastewater and water quality. (see <https://www.gov.uk/guidance/water-supply-wastewater-and-water-quality>)

- **Brownfield land registers (2017)**¹²⁹ provides guidance on the purpose, preparation, publication and reviewing of brownfield land registers.
- **Minerals (2014)**¹³⁰ outlines guidance for planning for mineral extraction in the plan-making and application process.

B.169 National Planning Practice Guidance (PPG)¹³¹: Requires local planning authorities to demonstrate every effort has been made to prioritise the use of poorer quality agricultural land for development where it has been demonstrated that significant development is required on agricultural land. It also requires that plan making considers, among other issues: identifying suitable sites for new or enhanced water infrastructure; assessing whether new development is appropriate near to sites used for water infrastructure; and the phasing of new development so that such infrastructure will be in place when and where needed. The impact of water infrastructure on sites designated for biodiversity should also be considered.

B.170 Waste Management Plan for England¹³²: Provides an analysis on the current waste management situation in England and evaluates how it will support implementation of the objectives and provisions of the revised Water Framework Directive.

B.171 National Planning Policy for Waste (NPPW)¹³³: Identifies key planning objectives, requiring planning authorities to:

- Help deliver sustainable development through driving waste management up the waste hierarchy.
- Ensure waste management is considered alongside other spatial planning concerns.
- Provide a framework in which communities take more responsibility for their own waste.
- Help secure the recovery or disposal of waste without endangering human health and without harming the environment.
- Ensure the design and layout of new development supports sustainable waste management.

B.172 A Green Future: Our 25 Year Plan to Improve the Environment¹³⁴: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. It identifies six key areas around which action will be focused. Those of relevance to this chapter are: using and managing land sustainably; and securing clean, healthy, productive and biologically diverse seas and oceans. Actions that will be taken as part of these two key areas are as follows:

- Using and managing land sustainably:
 - Improve the way we manage and incentivise land management, including designing and delivering a new environmental land management system.
 - Improve soil health and restore and protect peatlands – this will include developing a soil health index and ending the use of peat in horticulture.
- Securing clean, healthy, productive and biologically diverse seas and oceans:
 - Achieve good environmental status of our seas while allowing marine industries to thrive and complete our ecologically coherent network of well-managed marine protected areas (MPAs).

B.173 Safeguarding our Soils – A Strategy for England¹³⁵: Sets out how England's soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention on in tackling degradation threats, including: better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a changing climate; preventing soil pollution; effective soil protection during construction and; dealing with contaminated land.

¹²⁹ Ministry of Housing, Communities and Local Government (2017). Brownfield land registers. (see <https://www.gov.uk/guidance/brownfield-land-registers>)

¹³⁰ Ministry of Housing, Communities and Local Government (2014). Minerals. (see <https://www.gov.uk/guidance/minerals>)

¹³¹ Ministry of Housing, Communities & Local Government (last updated 1 October 2019). Planning Practice Guidance. (see <https://www.gov.uk/government/collections/planning-practice-guidance>).

¹³² Department for Environment, Food and Rural Affairs (2013). Waste management plan for England. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf).

¹³³ Department for Communities and Local Government (2014). National Planning Policy for Waste. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf).

¹³⁴ HM Government (2018). A Green Future: Our 25 Year Plan to Improve the Environment. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf).

¹³⁵ Department for Environment, Food and Rural Affairs (2009). Safeguarding our Soils: A Strategy for England. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69261/pb13297-soil-strategy-090910.pdf).

B.174 Water White Paper¹³⁶: Sets out the Government's vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It states outlines the measures that will be taken to tackle issues such as poorly performing ecosystem, and the combined impacts of climate change and population growth on stressed water resources.

B.175 Water for Life White Paper¹³⁷: Sets out how to build resilience in the water sector. Objectives of the White Paper are to:

- Paint a clear vision of the future and create the conditions which enable the water sector and water users to prepare for it.
- Deliver benefits across society through an ambitious agenda for improving water quality, working with local communities to make early improvements in the health of our rivers by reducing pollution and tackling unsustainable abstraction.
- Keep short- and longer-term affordability for customers at the centre of decision making in the water sector.
- Protect the interest of taxpayers in the policy decisions that we take.
- Ensure a stable framework for the water sector which remains attractive to investors.
- Stimulate cultural change in the water sector by removing barriers to competition, fostering innovation and efficiency, and encouraging new entrants to the market to help improve the range and quality of services offered to customers and cut business costs.
- Work with water companies, regulators and other stakeholders to build understanding of the impact personal choices have on the water environment, water resources and costs.
- Set out roles and responsibilities – including where Government will take a stronger role in strategic direction setting and assessing resilience to future challenges, as well as clear expectations on the regulators.

B.176 Future Water: The Government's Water Strategy for England¹³⁸: Sets out how the Government wants the water sector to look by 2030, providing an outline of steps which need to be taken to get there. These steps include improving the supply of water; agreeing on important new infrastructure such as reservoirs; proposals to time limit abstraction licences; and reducing leakage. The document also states that pollution to rivers will be tackled, whilst discharge from sewers will be reduced.

B.177 The Environment Act 2021¹³⁹ sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. It also establishes the Office for Environmental Protection which will act as an impartial and objective body for the protection and improvement of the environment. The Act sets out legislation which covers:

- Resource efficiency, producer responsibility, and the management, enforcement and regulation of waste;
- Local air quality management frameworks and the recall of motor vehicles etc; and
- Plans and proposals for water resources, drainage and sewerage management, storm overflows, water quality and land drainage.

B.178 Establishing the Best Available Techniques for the UK (UK BAT) (2022)¹⁴⁰ sets out a new framework that aims to improve industrial emissions and protect the environment through the introduction of a UK BAT regime. It aims to set up a new structure of governance with a new independent body in the form of Standards Council and the Regulators Group, consisting of government officials and expert regulators from all UK nations. It aims to also establish a new UK Air Quality Governance Group to oversee the work of the Standards Council and the delivery of the requirements under this new framework. It is anticipated that the BATC for the first four industry sectors will be published in the second half of 2023.

B.179 The Waste (Circular Economy) (Amendment) Regulations (2020)¹⁴¹ amend a range of legislation to prevent waste generation and to monitor and assess the implementation of measures included in waste prevention programmes. They set out

¹³⁶ Department for Environment, Food and Rural Affairs (2012). The Water White Paper. (see <https://publications.parliament.uk/pa/cm201213/cmselect/cmenvfru/374/374.pdf>).

¹³⁷ Department for Environment, Food and Rural Affairs (2011). Water for Life. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228861/8230.pdf).

¹³⁸ HM Government (2008). Future Water: The Government's water strategy for England.

(https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69346/pb13562-future-water-080204.pdf).

¹³⁹ HM Government (2021). Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

¹⁴⁰ DEFRA (2022) Establishing the Best Available Techniques for the UK (UK BAT). (see <https://www.gov.uk/government/publications/establishing-the-best-available-techniques-for-the-uk-uk-bat/establishing-the-best-available-techniques-for-the-uk-uk-bat#current-situation>)

¹⁴¹ HM Government (2020). The Waste (Circular Economy) Regulations. (see <https://www.legislation.gov.uk/uksi/2020/904/contents/made>)

requirements to justify not separating waste streams close to source for re-use, recycling or other recovery operations, prohibit incineration and landfilling of waste unless such treatment process represent the best environmental outcome in accordance with the waste hierarchy. The Regulations set out when waste management plans and in waste prevention programmes are required. The Regulations focus on the circular economy as a means for businesses to maximise the value of waste and waste treatment.

Sub-national

B.180 Suffolk Minerals & Waste Local Plan (July 2020)¹⁴²: The Plan contains planning policies for determining planning applications for minerals and waste development. The Plan allocates 10 sites for the extraction of sand and gravel sufficient to supply 9.300 Mt over the Plan period to the end of 2036. The Plan also has policies to maintain a landbank of permitted reserves of at least 7 years based upon the average of the last 10 years' sales.

B.181 Waste Core Strategy including Development Management Policies (2011)¹⁴³: The Waste Core Strategy forms part of the Suffolk Minerals & Waste Development Framework. The Waste Core Strategy contains the adopted and existing waste planning policy for Suffolk. Proposals are made for sites suitable for the development of Strategic Residual Waste Treatment Facilities and Non Hazardous Landfill.

B.182 Minerals Core Strategy (2008)¹⁴⁴: The Minerals Core Strategy forms part of the Suffolk Minerals & Waste Development Framework. The Minerals Core Strategy establishes the framework for all other Mineral Development Plan Documents (DPDs), which must conform to its principles. It is intended to cover the period up to the end of 2021 in line with the emerging East of England Plan. The Minerals Core Strategy sets out the key elements of the minerals planning framework for the county based on an agreed vision followed by aims and strategic objectives.

B.183 Anglian river basin district river basin management plan (2022)¹⁴⁵: Under the obligations of the European Water Framework Directive (WFD) (2000), River Basin Management Plans (RBMPs) are prepared. The RBMP for the Anglian River Basin District sets out the current state of the water environment, pressures affecting the water environment, environmental objectives for protecting and improving the waters, a programme of measures and actions needed to achieve the objectives and progress.

B.184 Babergh District Council Contaminated Land Strategy (2009)¹⁴⁶: Provides the strategy that the Council will use to take action to prevent harm from occurring, as well as the strategy for inspecting contaminated land in the District and how the Council will manage the information generated to ensure the polluter pays.

B.185 Mid Suffolk District Council Statutory Contaminated Land Strategy (2006)¹⁴⁷: The report details the contaminated land strategy including a description of the Mid Suffolk area and how particular characteristics may impact on inspection strategy. It also explains the strategy for the identification of contaminated sites and how sites are prioritised according to risk. The report details the strategy for obtaining further information on pollutant linkages and the risk assessment process. The strategy also covers written determination, liability and enforcement.

B.186 Sudbury and Great Cornard Surface Water Management Plan (2019)¹⁴⁸: This is a Surface Water Management Plan (SWMP) for the towns of Sudbury and Great Cornard which adheres to the four-stage approach set out in Defra's SWMP Technical Guidance Document (March 2010).

B.187 Water Resources Management Plan 2019 (2019)¹⁴⁹: Every five years, Anglian Water writes a Water Resources Management Plan, which sets out how Anglian Water will manage the water supplies in their region to meet current and future

¹⁴² Suffolk County Council (2020) Suffolk Minerals & Waste Local Plan (see: <https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/suffolk-minerals-and-waste-development-scheme>)

¹⁴³ Suffolk County Council (March 2011) Waste Core Strategy including Development Management Policies: <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Waste-Core-Strategy-2011.pdf>.

¹⁴⁴ Suffolk County Council (September 2008) Minerals Core Strategy Adopted Version: <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Minerals-Core-Strategy-Adopted-Version.pdf>.

¹⁴⁵ Environment Agency (2022) Anglian river basin district river basin management plan: <https://www.gov.uk/guidance/anglian-river-basin-district-river-basin-management-plan-updated-2022>

¹⁴⁶ Babergh District Council (2009). Contaminated Land Strategy. (see <https://www.babergh.gov.uk/assets/Environment/Contaminated-Land-Strategy-.pdf>).

¹⁴⁷ Mid Suffolk District Council (2000). Statutory Contaminated Land Strategy. (see <https://www.babergh.gov.uk/assets/Environment/Contaminated-Land-Strategy-Mid-Suffolk.pdf>).

¹⁴⁸ BMT (2019). Sudbury and Great Cornard Surface Water Management Plan. (see <http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Surface-Water-Management-Plans/FINALSudburyandGreatCornardSWMPv3.pdf>).

¹⁴⁹ Anglian Water (2019). Water Resources Management Plan. (see <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf>).

needs over a minimum of 25 years. The current Plan, published in 2019, covers the period 2020-2045. The **Draft Water Resources Management Plan 2024 (2022)**¹⁵⁰ covers the period 2025–2050.

B.188 Water Recycling Long-Term Plan (2018)¹⁵¹: This is Anglian Water's long-term plan for managing the supply of water recycling services to meet the demands of a growing population. It is used to inform investment and identify key indicators for change and transform Anglian Water's 'business as usual' practices. The Plan promotes the efficient and effective use of available resources, seeks to improve the resilience of public water supplies, supports the delivery of Anglian Water's wider resilience strategy and enhances the environment by reducing abstraction in sensitive areas.

B.189 South East Inshore Marine Plan (2021)¹⁵²: This document introduces a strategic approach to planning within the inshore waters between Felixstowe, in Suffolk and near Dover, in Kent. It provides an evidence-based approach to inform decision-making by marine users and regulators on where activities might take place within the inshore marine plan area. The Plan will help to enhance and protect the marine environment and achieve sustainable economic growth, whilst respecting local communities both within and adjacent to the marine plan area. Babergh and Mid Suffolk District overlaps the South East Inshore Marine Plan area. In the case of Babergh, the overlap includes the tidal extent of the Rivers Stour and Orwell.

B.190 Anglian Water Drought Plan (2022)¹⁵³: This Drought Plan covers the Babergh region of the plan area and is an update of the previously published revised draft Drought Plan 2022. It provides an overview on how Anglian Water propose to manage water resources during a drought to protect public water supplies, whilst minimising any environmental impacts that may arise as a result of activities.

B.191 Essex and Suffolk Water Drought Plan (2022)¹⁵⁴: This report covers the Suffolk supply region of the plan area. ESW's supply areas are particularly prone to drought. The report has been prepared following the Environment Agency's 'Water Company Drought Plan Guidance' (2016) and identifies how the company intends to manage a future drought and what measures are available to support supplies when levels of service are compromised.

B.192 A Multi-Sector Approach to Providing Long-Term Resilience for Regional Water Resources: Our Emerging Strategy (January 2018)¹⁵⁵: Water Resources East (WRE), formed in 2014 by Anglian Water, aims to develop a more collaborative approach to water resource management planning in the East of England. Its vision is to create a fully integrated, adaptive regional water catchment that enables communities, the environment and the economy to grow and prosper. Its objectives are as follows:

1. Secure water supplies to enable sustainable housing growth.
2. Protect and enhance the environment.
3. Work through genuine multi-sector collaboration and shared decision making.
4. Find integrated, holistic solutions that address drought and flooding.

Current baseline

Geology and minerals

B.193 The geology of Suffolk compared to other parts of the UK is relatively simple. The County has an extensive spread of till (boulder clay) which is underlain by chalk.

¹⁵⁰ Anglian Water (2022). Draft WRMP24 Main Document. (see <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp/draft-wrmp24-main-report.pdf>).

¹⁵¹ Anglian Water (2018). Water Recycling Long-Term Plan. (see <https://www.anglianwater.co.uk/siteassets/household/in-the-community/water-recycling-long-term-plan.pdf>).

¹⁵² HM Government (2021). South East Inshore Marine Plan. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004493/FINAL_South_East_Marine_Plan_1_.pdf).

¹⁵³ Anglian Water Services (2022). Drought Plan 2022 Final Version. (see <https://www.anglianwater.co.uk/siteassets/household/about-us/aws-drought-plan-2022.pdf>). <https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/drought-plan/>

¹⁵⁴ Essex and Suffolk Water (2022). Essex and Suffolk Water Drought Plan 2022. (<https://www.nwg.co.uk/globalassets/corporate/environment-pdfs/drought-plan/esw/esw-final-drought-plan---20may22---published-version.pdf>). <https://www.nwg.co.uk/droughtplan>

¹⁵⁵ Water Resources East (January 2018). A Multi-Sector Approach to Providing Long-Term Resilience for Regional Water Resources. (see https://wre.org.uk/wp-content/uploads/2020/01/HR-S_1288-WRE-Strategy-document-JAN18-1.pdf).

B.194 The principal mineral resource within Suffolk is sand and gravel. Sand and gravel deposits are distributed fairly evenly across the County, although there are particular concentrations in the river valleys, especially the Gipping valley (which runs from roughly the north-west of the county down to Ipswich and the coast).

B.195 Suffolk Local Aggregates Assessment (2018)¹⁵⁶ estimates the quantity of minerals across the County and plans for a steady and adequate supply of aggregates over the coming years to help meet housing and infrastructure needs. The report covers how the demand for construction aggregates is met within Suffolk. According to the assessment, the supply of aggregates to Suffolk is made up of sand and gravel imported from surrounding counties, along with imported crushed rock, marine dredged gravel and sand, indigenous and imported recycled construction, demolition and excavation waste.

B.196 According to the Minerals Core Strategy¹⁵⁷, the most recent forecast and county apportionment on sand and gravel agreed by the East of England Regional Aggregates Working Party in 2003 was 1.73mt per annum. Since 2003, the annual landbank calculation has been based on this provision. Suffolk does not have an apportionment for any other mineral.

B.197 The total permitted and committed reserves at the beginning of 2007 was 16.85mt. With an apportionment of 1.73mt per annum, these reserves would be sufficient for 9.7 years (until 2015). To ensure a continuing supply of aggregate for the period of the Plan up to 2021, a further 9.2mt needs to be identified.

B.198 The minerals sites in the two Districts are shown in **Figure B.12**.

B.199 BMSDC has national and local designations for their geological significance, with one County Geological Site in each of the two Districts:

- **Babergh District:** Harkstead cliff and shore – London clay cliffs with brickearth/channel deposit at the east end and contorted gravel above.
- **Mid Suffolk District:** Needham Lake Erratic – glacial erratic boulder.

B.200 41 Sites of Special Scientific Interest (SSSI) are present within BMSDC, five of which are designated for their geological significance:

- **Hoxne Brick Pit SSSI:** This SSSI is 1.3 hectares with flint hand axes dating back 400,000 years. Hoxnian Stage deposits have also been found at the site.
- **Hascot Hill Pit SSSI:** This SSSI is 0.3 hectares and the only known site to expose beach deposits from late Pliocene and early Pleistocene Red Crag Formation.
- **Sandy Lane Pit SSSI, Barham:** This SSSI is 11.1 hectares with deposits that span from the Beestonian stage through to the Cromerian Stage and then to the severe ice age of the Anglian Stage.
- **Creting St Mary Pits SSSI:** This SSSI is 5.4 hectares with former quarries that are the 'type site' for Creting Sands. Creting Sands are intertidal and shallow marine deposits from early Pleistocene interglacial age.
- **Great Blakenham Pit SSSI:** This SSSI is 2.2 hectares and a key site for Pleistocene studies, with a range of early and middle Pleistocene deposits.

Soils

B.201 The underlying soils give rise to a mix of classified agricultural land, as shown in **Figure B.13**. The majority of land within Babergh and Mid Suffolk is Agricultural Land Classification Grade 2 or 3. There are some small areas designated as Grade 4, urban and non-agricultural. Grade 1 and Grade 2 agricultural land represent the best and most versatile land for farming, along with Grade 3a agricultural land, but the national maps of agricultural land classification do not distinguish between Grade 3a and Grade 3b agricultural land

¹⁵⁶ Suffolk County Council (2018). Suffolk Local Aggregates Assessment. (see <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Local-Aggregates-Assessment-2018-dataLatest-Version.pdf>).

¹⁵⁷ SCC (2008). Minerals Core Strategy. (see <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Minerals-Core-Strategy-Adopted-Version.pdf>).

Contaminated land

B.202 For a site to meet the definition of contaminated land, a pollutant linkage must be established. A pollutant linkage consists of three parts: a source of contamination in, on or under the ground; a pathway by which the contaminant is causing significant harm or harm (or which presents a significant possibility of such harm being caused); and a receptor of a type specified in the regulations.

B.203 Babergh and Mid Suffolk Councils are required to maintain a Public Register of Contaminated Land under the Environmental Protection Act 1990 however, there are currently no entries on register in either Districts. Over the next few years, the Councils plan to inspect the Districts for contaminated land to help prevent harm to the environment and human health. Babergh and Mid Suffolk have separate contaminated land strategies that provide further information about how the Councils plan to examine the contaminated land.

Water

B.204 The Districts are within the Anglian River Basin, the management plan of which aims to prevent physical modifications, negative effects of invasive non-native species, pollution from wastewater, towns, cities, rural areas and transport. Babergh is in the Combined Essex Catchment Partnership and Mid Suffolk is in the East Suffolk Catchment Partnership. The idea behind these partnerships is to engage a wide range of stakeholders and encourage local action to protect and enhance the water environment.

B.205 Anglian Water provides for Babergh District, whilst Essex and Suffolk Water provides for Mid Suffolk, yet both are particularly prone to drought. Therefore, both Districts are located within a water stressed area. Much of eastern England receives less than 700 mm of rainfall per year and includes some of the driest areas in the United Kingdom¹⁵⁸. Due to water being imported from elsewhere in the country, there must be effective and reliable water systems in place to reduce any harms associated with droughts, ranging from small-scale water inefficiencies to large-scale ones, in order to ensure a sustainable supply of water. The WRMPs of Anglian Water and Essex & Suffolk Water show a supply-demand deficit if no action is taken¹⁵⁹. Specifically, Anglian Water anticipates that the supply-demand balance will change from a total regional surplus of 150 MI/d in 2020, to a total regional deficit of -30MI/d by 2025 and -144 MI/d by 2045, should no action be taken. One of the Water Resource Zones within Essex and Suffolk Water, Hartismere, falls within the Mid Suffolk boundary. In the Hartismere Water Resource Zone, the supply surplus is predicted to be maintained across the Plan period provided management controls are in place to maintain the surplus, e.g. through preventing non-domestic uses that require high water uses. According to the Water Cycle Study, most areas within both Districts covered by Anglian Water require infrastructure and/or treatment upgrades to serve a growing population. In the Essex and Suffolk Water area, it is likely that larger development sites and those on the periphery of the network may require some network reinforcement. The same applies with regard to wastewater treatment flow capacity and foul sewerage network capacity.

B.206 There are Source Protection Zones (SPZs) scattered throughout the Districts, as shown in **Figure B.14**. However, SPZ 3 covers the majority of the Districts which is the total catchment. Small areas across the Districts make up the inner and outer catchments.

B.207 Drinking Water Safeguard Zones (Surface Water) are catchment areas that influence the water quality for their respective Drinking Water Protected Area (Surface Water), which are at risk of failing the drinking water protection objectives. These non-statutory Safeguard Zones are where action to address water contamination will be targeted, so that extra treatment by water companies can be avoided. Safeguard Zones are a joint initiative between the Environment Agency and water companies. Safeguard Zones are one of the main tools for delivering the drinking water protection objectives of the Water Framework Directive. This data includes what substances are causing the drinking water protected area to be 'at risk'. Safeguard Zones cover the majority of land in both Districts.

B.208 The water quality within Babergh and Mid Suffolk Districts has been assessed through their Water Cycle Study¹⁶⁰. The majority of the waterbodies have a moderate or poor ecological status, and in all of the waterbodies that contain a Water Recycling Centre (WRC) serving growth, sewage discharge was cited as one of the "reasons for not achieving good status". The only waterbody within the catchment which has a bad ecological status is the Little Ouse (US Thelnetham) (Waterbody ID

¹⁵⁸ Met Office (2020). Eastern England: climate. (see <https://www.metoffice.gov.uk/research/climate/maps-and-data/regional-climates/index>).

¹⁵⁹ JBA Consulting (2020). Babergh & Mid Suffolk District Council Water Cycle Study Final Report.

¹⁶⁰ JBA Consulting (2020). Babergh & Mid Suffolk District Council Water Cycle Study Final Report.

GB105033043060). The waterbody received bad ecological status for fish and dissolved oxygen. Also contributing to the good status not being achieved are diffuse sources of phosphate from agriculture (livestock and poor nutrient management), and in some cases from urban and transport sources. The River Basin Management Plan for the Anglian River Basin estimates that pollution from wastewater affects 50% of water bodies within this river basin district. The Water Cycle Study found that a number of WRCs have limited headroom in their environmental permit, additional growth may require changes to their flow permit and accompanying changes to their environmental permit and/or upgrades to treatment performance.

Waste

B.209 Within Suffolk County, there are currently 100 active waste management facilities¹⁶¹, 17 of which are located in Babergh District and 34 of which are located in Mid Suffolk District. A growing population in BMSDC will place pressure on existing waste management facilities and as such, there will be a requirement to meet growing needs.

B.210 According to both Districts' Climate Change and Biodiversity Annual Reports^{162,163}, all kerbside waste, when it cannot be recycled, goes to the Suffolk Energy from Waste plant which powers more than 30,000 homes. Their recycling rate (reduction in waste sent to the energy from waste plant) for 2020/21 was 39.49% and their aim is to increase this to 65%.

¹⁶¹ Suffolk County Council (2015). Waste Policies: Monitoring Report 2014. (see <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-applications/Minerals-and-Waste-Development-Planning/Annual-Monitoring-Reports/Waste-MR-Final-March-2015.pdf>).

¹⁶² Babergh District Council (2021). Climate Change and Biodiversity Annual Report. (see <https://www.babergh.gov.uk/assets/Environment/Climate-change-and-biodiversity-annual-report-Babergh.pdf>).

¹⁶³ Mid Suffolk District Council (2021). Climate Change and Biodiversity Annual Report. (see <https://www.babergh.gov.uk/assets/Environment/Climate-change-and-biodiversity-annual-report-Mid-Suffolk.pdf>).

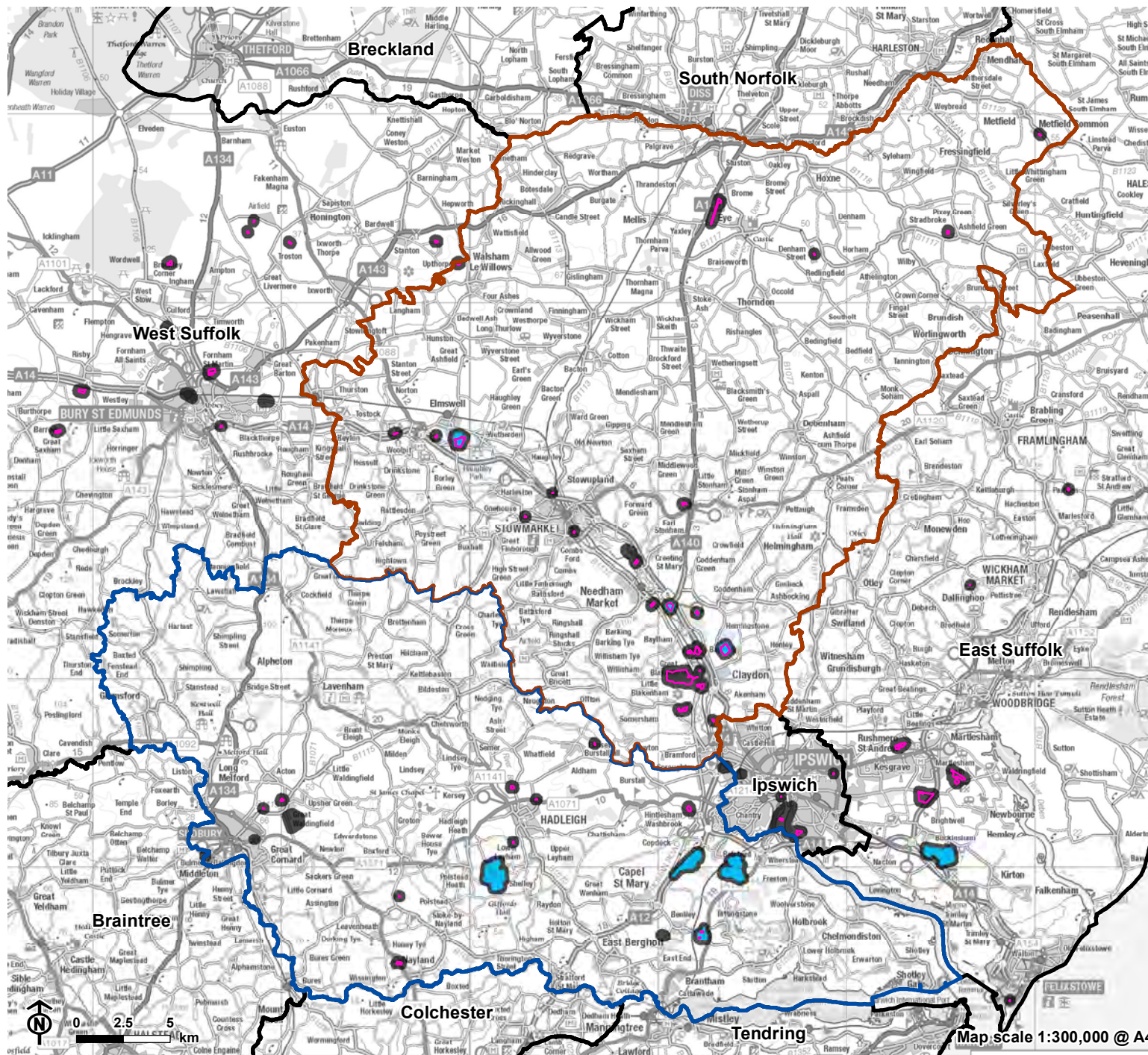
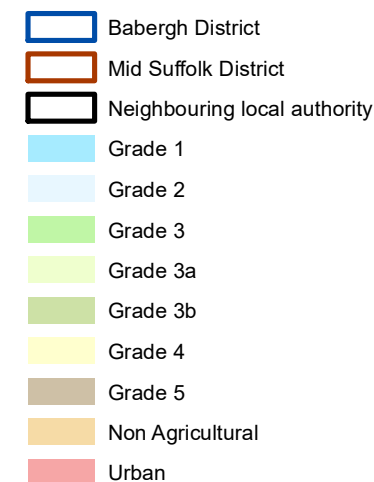
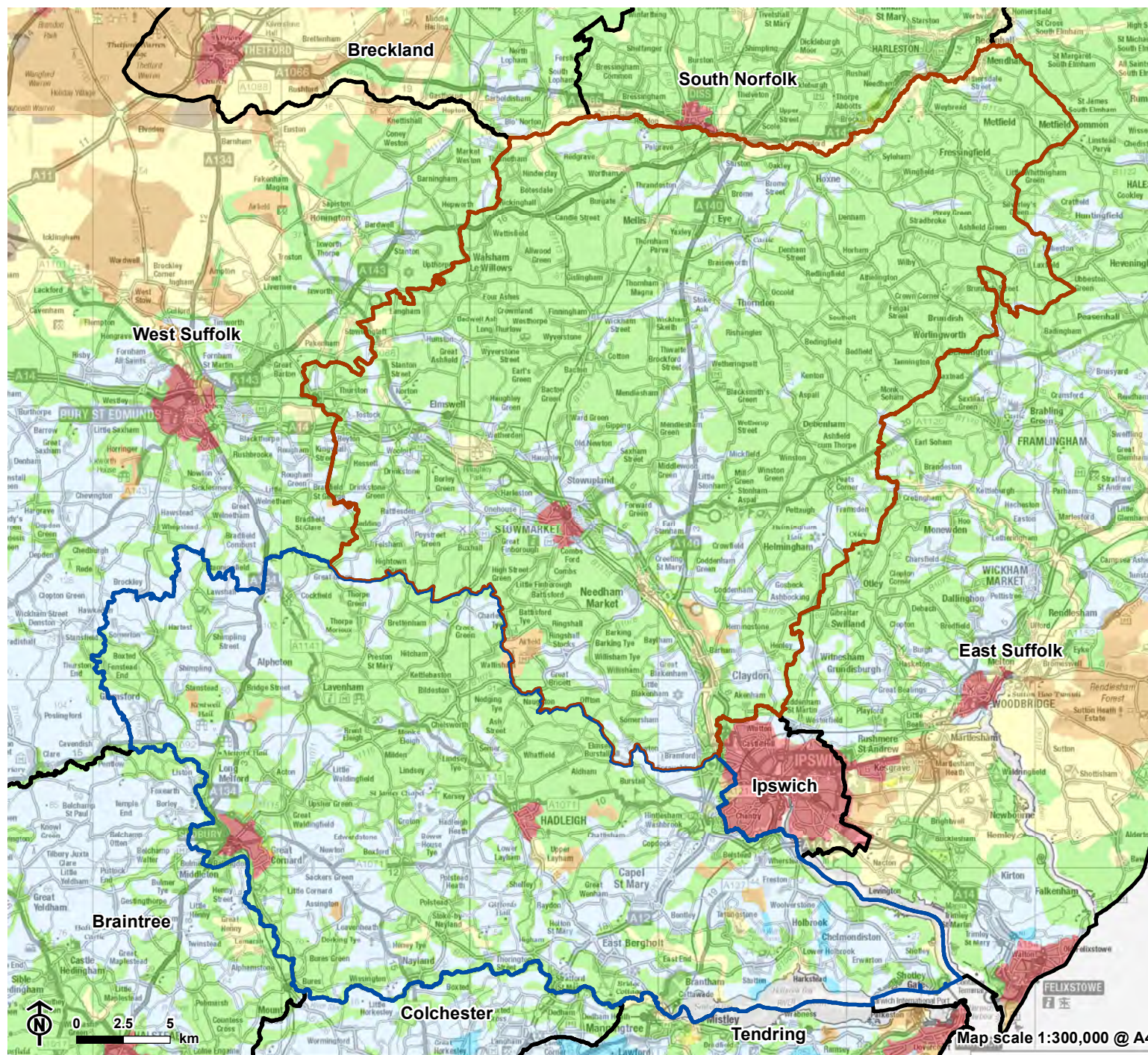


Figure B.12: Minerals and Waste Sites

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- Mineral extraction site
- Waste site
- 250 metre Site Safeguard Area

**Figure B.13: Agricultural Land
Classification**



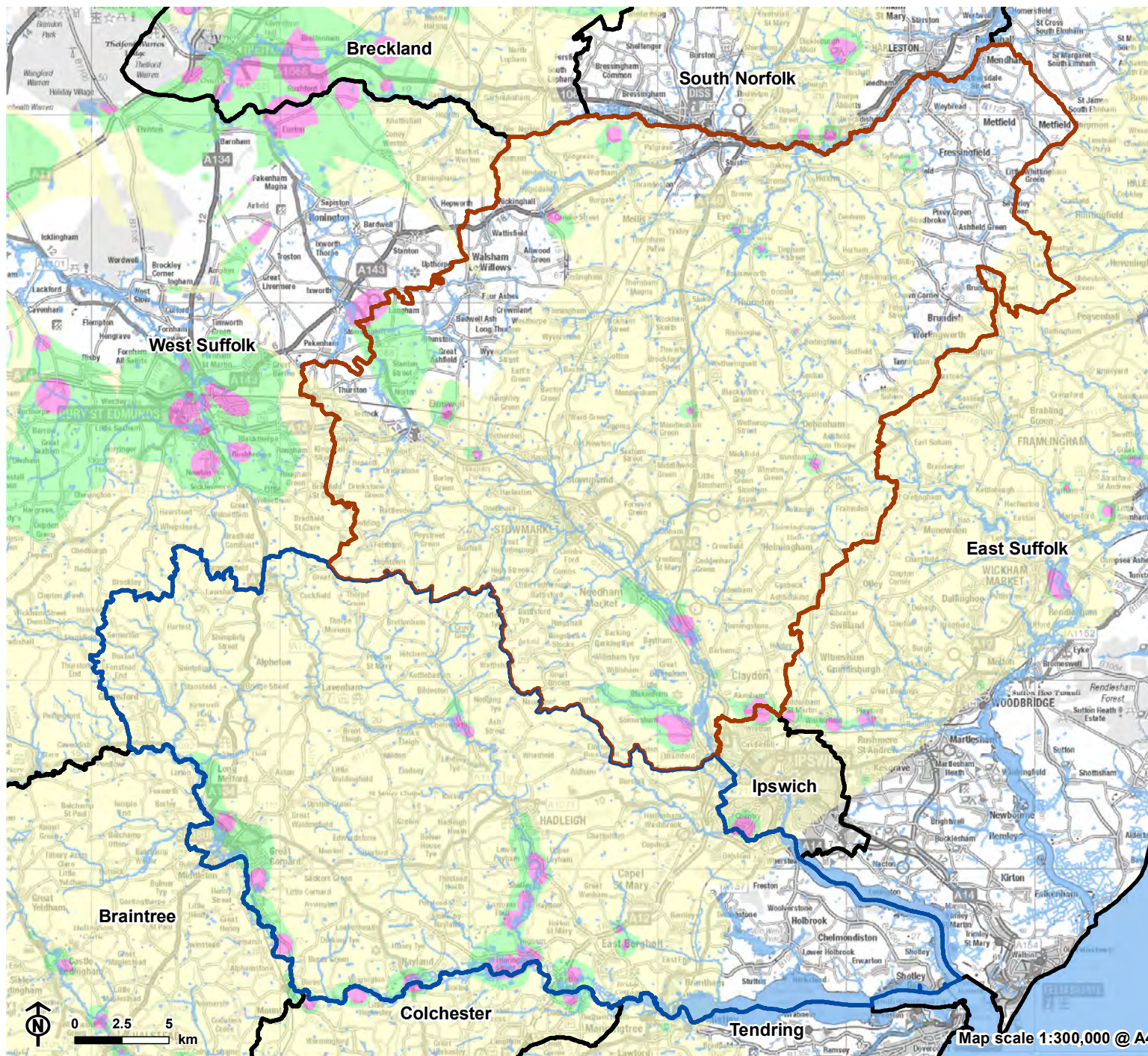


**Figure B.14: Watercourses and
Source Protection Zones**

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- Watercourse
- Source protection zone**
- Zone 1
- Zone 2
- Zone 3

Climate Change Adaptation and Mitigation

Policy context

International

B.211 United Nations Paris Climate Change Agreement (2015)¹⁶⁴: International agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

National

B.212 The NPPF (2021)¹⁶⁵ contains as part of its environmental objective a requirement to mitigate and adapt to climate change, *“including moving to a low carbon economy”*. The document also states that the *“planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change.”* To achieve these aims new development should be planned to ensure appropriate adaptation measures are included (including green infrastructure) and should be designed, located and orientated as to help to reduce greenhouse gas emissions.

B.213 The revised framework also requires that development be directed away from areas which are at highest existing or future risk of flooding. Where development is required in such areas, the *“development should be made safe for its lifetime without increasing flood risk elsewhere.”*

B.214 In relation to coastal change in England planning policies and decisions should take account of the UK Marine Policy Statement and marine plans. Furthermore, plans should *“reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast”*.

B.215 The NPPF is supported by planning practice guidance relating to:

- **Flood risk and coastal change (2021)**¹⁶⁶ provides guidance on how the planning process can assess, avoid, manage and mitigate the risks associated with flooding and coastal change.
- **Climate change (2019)**¹⁶⁷ advises how to identify suitable mitigation and adaptation measures in the planning process to address the impacts of climate change.
- **Renewable and low carbon energy (2015)**¹⁶⁸ outlines guidance for developing a strategy for renewable and low carbon energy, and particular planning considerations for hydropower, solar technology, solar farms and wind turbines.

B.216 National Planning Practice Guidance¹⁶⁹: Supports the content of the NPPF by promoting low carbon and renewable energy generation, including decentralised energy, the energy efficiency of existing and new buildings and sustainable transport.

B.217 The Environment Act 2021¹⁷⁰ sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. The Environment Act will deliver:

- Long-term targets to improve air quality biodiversity, water, and waste reduction and resource efficiency.
- A target on ambient PM2.5 concentrations.
- A target to halt the decline of nature by 2030.
- Environmental Improvement Plans, including interim targets.
- A cycle of environmental monitoring and reporting.

¹⁶⁴ United Nations (2015). Paris Agreement. (see http://unfccc.int/files/essential_background/convention/application/pdf/english_paris_agreement.pdf).

¹⁶⁵ Ministry of Housing, Communities and Local Government (2021). National Planning Policy Framework [online]. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf).

¹⁶⁶ Ministry for Housing, Communities and Local Government (2021). Flood risk and coastal change. (see <https://www.gov.uk/guidance/flood-risk-and-coastal-change>).

¹⁶⁷ Ministry of Housing, Communities and Local Government (2019). Climate change. (see <https://www.gov.uk/guidance/climate-change>).

¹⁶⁸ Ministry of Housing, Communities and Local Government (2015). Renewable and low carbon energy. (see <https://www.gov.uk/guidance/renewable-and-low-carbon-energy>).

¹⁶⁹ Ministry of Housing, Communities & Local Government (last updated 1 October 2019). Planning Practice Guidance. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf).

¹⁷⁰ HM Government (2021) Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

- Environmental Principles embedded in domestic policy making.
- Office for Environmental Protection to uphold environmental law.

B.218 The British energy security strategy (2022)¹⁷¹ sets out how the UK will enhance its energy security, setting out plans for future deployment of wind, new nuclear, solar and hydrogen, and for supporting the production of domestic oil and gas in the nearer term. The strategy builds on the Prime Minister's 'Ten point plan for a green industrial revolution', and the 'Net zero strategy'. Key aims and commitments include:

- New commitments to supercharge clean energy and accelerate deployment, which could see 95% of Great Britain's electricity set to be low carbon by 2030.
- Supporting over 40,000 more jobs in clean industries, totalling 480,000 jobs by 2030.
- Accelerated expansion of nuclear, wind, solar, hydrogen, oil and gas, including delivering the equivalent to one nuclear reactor a year instead of one a decade.
- Offshore wind – aim of providing up to 50GW by 2030, of which 5GW is planned to be from floating offshore wind in deeper seas. This is aimed to be underpinned by new planning reforms to cut the approval times for new offshore wind farms from 4 years to 1 year and an overall streamlining which will aim to reduce the time it takes for new projects to reach construction stages while improving the environment.
- Oil and gas - a licensing round for new North Sea oil and gas projects is planned to launch in Autumn, with a new taskforce providing bespoke support to new developments.
- Onshore wind – The Government plan to consult on developing partnerships with a limited number of supportive communities who wish to host new onshore wind infrastructure in return for guaranteed lower energy bills.
- Heat pump manufacturing: The Government aim to run a Heat Pump Investment Accelerator Competition in 2022 worth up to £30 million to make British heat pumps, with hopes to reduce demand for gas.

B.219 The Net Zero Strategy: Build Back Greener (2021)¹⁷² sets out policies and proposals for decarbonising all sectors of the UK economy to meet net zero targets by 2050. It sets out strategies to keep the UK on track with carbon budgets, outlines the National Determined Contribution (NDC) and sets out the vision for a decarbonised economy in 2050. Its focus includes:

- Policies and proposals for reducing emissions across the economy in key sectors (power, fuel supply and hydrogen, industry, heat and buildings, transport, natural gas and waste); and
- Policies and proposals for supporting transition across the economy through innovation, green investment, green jobs, embedding net-zero in government, local climate action, empowering people and businesses, and international leadership and collaboration.

B.220 The UK Hydrogen Strategy (2021)¹⁷³ sets out the Government's approach to developing a thriving low carbon hydrogen sector in the UK, with the ambition for 5GW of capacity by 2030. The Strategy outlines the role of hydrogen in meeting net zero targets, the existing opportunity within the UK, a strategic framework, a roadmap for the economy, and the UK Government's commitments for a hydrogen economy.

B.221 The Industrial Decarbonisation Strategy (2021)¹⁷⁴ aims to support existing industry to decarbonise and encourage the growth of new, low carbon industries to protect and create skilled jobs and businesses in the UK encouraging long-term investment in home-grown decarbonisation technology. The strategy builds in the Prime Minister's 10 Point Plan for a Green Industrial Revolution and sets out the government's vision for the manufacturing and construction sector and is part of the government's path to net zero by 2050.

B.222 The strategy aims to reduce emissions by two-thirds in just 15 years and support up to 80,000 jobs over the next thirty years and includes measures to produce 20 terawatt hours of the UK industry's energy supply from low carbon alternatives by

¹⁷¹ Department for Business, Energy & Industrial Strategy and Prime Minister's Office, 10 Downing Street (2022). British energy security strategy. (see: <https://www.gov.uk/government/publications/british-energy-security-strategy>)

¹⁷² Department for Business, Energy and Industrial Strategy (2021). Net Zero Strategy: Build Back Greener. (see <https://www.gov.uk/government/publications/net-zero-strategy>)

¹⁷³ Department for Business, Energy & Industrial Strategy (2022). UK Hydrogen Paper. (see: <https://www.gov.uk/government/publications/uk-hydrogen-strategy>)

¹⁷⁴ Department for Business, Energy & Industrial Strategy (2021). Industrial decarbonisation strategy. (see: <https://www.gov.uk/government/publications/industrial-decarbonisation-strategy>)

2030. It also aims to introduce new rules on measuring the energy and carbon performance of the UK's largest commercial and industrial buildings, providing potential savings to businesses of around £2 billion per year in energy costs in 2030 and aiming to reduce annual carbon emissions by over 2 million tonnes - approximately 10% of their current emissions.

B.223 Other key commitments within the Strategy include:

- The use of carbon pricing to drive changes in industry to focus on emissions in business and investment decisions;
- To establish a policy framework to accelerate the switch from fossil fuels to low carbon alternatives such as hydrogen, electricity, or biomass;
- New product standards, enabling manufacturers to clearly distinguish their products from high carbon competitors;
- To ensure the land planning regime is fit for building low carbon infrastructure;
- Support the skills transition so that the UK workforce benefits from the creation of new green jobs;
- An expectation that at least 3 megatons of CO₂ is captured within industry per year by 2030;
- That by 2050, there will be zero avoidable waste of materials across heavy industries.

B.224 The **Heat and Buildings Strategy (2021)**¹⁷⁵ sets out the government's plan to significantly cut carbon emissions from the UK's 30 million homes and workplaces. This strategy aims to provide a clear direction of travel for the 2020s, set out the strategic decisions that need to be taken this decade, and demonstrate how the UK plans to meet its carbon targets and remain on track for net zero by 2050.

B.225 Key aims of the strategy include:

- Reduce direct emissions from public sector buildings by 75% against a 2017 baseline by the end of carbon budget 6.
- Significantly reduce energy consumption of commercial, and industrial buildings by 2030.
- Phase out the installation of new natural gas boilers beyond 2035.
- Significantly grow the supply chain for heat pumps to 2028: from installing around 35,000 hydronic heat pumps a year to a minimum market capacity of 600,000 per year by 2028.
- Reduce the costs of installing a heat pump by at least 25-50% by 2025 and to ensure heat pumps are no more expensive to buy and run than gas boilers by 2030.
- Achieve 30-fold increase in heat pumps manufactured and sold within the UK by the end of the decade.
- Grow the market for heat pumps notably via a £450 million Boiler Upgrade Scheme to support households who want to switch with £5,000 grants.
- Improve heat pump appeal by continuing to invest in research and innovation, with the £60 million Net Zero Innovation Portfolio 'Heat Pump Ready' Programme supporting the development of innovation across the sector.
- Ensure all new buildings in England are ready for Net Zero from 2025. To enable this, new standards will be introduced through legislation to ensure new homes and buildings will be fitted with low-carbon heating and high levels of energy efficiency.
- Establish large-scale trials of hydrogen for heating, including a neighbourhood trial by 2023.
- Ensure as many fuel poor homes in England, as reasonably practicable, achieve a minimum energy efficiency rating of band C by the end of 2030.
- Support social housing, low income and fuel poor households via boosting funding for the Social Housing Decarbonisation Fund and Home Upgrade Grant, which aim to improve the energy performance of low income households' homes, support low carbon heat installations and build the green retrofitting sector to benefit all homeowners.

¹⁷⁵ Department for Business, Energy & Industrial Strategy (2021). Heat and buildings strategy. (see: <https://www.gov.uk/government/publications/heat-and-buildings-strategy>)

- Scale up low-carbon heat network deployment and to enable local areas to deploy heat network zoning- Heat Network Transformation Programme of £338 million (over 2022/23 to 2024/25).

B.226 The Energy Performance of Buildings Regulations (2021)¹⁷⁶ seek to improve the energy efficiency of buildings, reducing their carbon emissions and lessening the impact of climate change. The Regulations require the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance, reported through Energy Performance Certificates and Display Energy Certificates.

B.227 The Energy white paper: Powering our net zero future (2020)¹⁷⁷ builds on the Prime Minister's Ten point plan for a green industrial revolution. The white paper addresses the transformation of the UK's energy system, promoting high-skilled jobs and clean, resilient economic growth during its transition to net-zero emissions by 2050.

B.228 Key aims of the paper include:

- Supporting green jobs - The government aims to support up to 220,000 jobs in the next 10 years. Several will be supported via a "major programme" that will see the retrofitting of homes for improved energy efficiency and clean heat.
- Transforming the energy system - To transform its electricity grid for net-zero, the white paper highlights how this will involve changing the way the country heats its homes, how people travel, doubling the electricity use, and harnessing renewable energy supplies.
- Keeping bills affordable - The government aims to do this by making the energy retail market "truly competitive". This will include offering people a simple method of switching to a cheaper energy tariff and testing automatically switching consumers to fairer deals to tackle "loyalty penalties".
- Generating emission-free electricity by 2050 - The government aims to have "overwhelmingly decarbonised power" in the 2030s in order to generate emission-free electricity by 2050.
- Establishing UK Emissions Trading Scheme - The government aims to establish a UK Emissions Trading Scheme (UK ETS) from 1 January 2021 to replace the current EU ETS at the end of the Brexit Transition Period.
- Exploring new nuclear financing options - The government said it is continuing to explore a range of financing options for new nuclear with developers including the Regulated Asset Base (RAB) funding model.
- Further commitments to offshore wind - The white paper lays out plans to scale up its offshore wind fleet to 40 gigawatts (GW) by 2030, including 1GW of floating wind, enough to power every home in the country.
- Carbon capture and storage investments - Including £1bn worth of investments in state-of-the-art CCS in four industrial clusters by 2030. With four low-carbon clusters set up by 2030, and at least one fully net-zero cluster by 2040.
- Kick-starting the hydrogen economy - The government plans to work with industry to aim for 5GW of production by 2030, backed up by a new £240m net-zero Hydrogen Fund for low-carbon hydrogen production.
- Investing in electric vehicle charge points- The government plans to invest £1.3bn to accelerate the rollout of charge points for electric vehicles as well as up to £1bn to support the electrification of cars, including for the mass-production of the batteries needed for electric vehicles.
- Supporting the lowest paid with their bills - The government aims to support those with lower incomes through a £6.7bn package of measures that could save families in old inefficient homes up to £400. This includes extending the Warm Home Discount Scheme to 2026 to cover an extra three quarters of a million households and giving eligible households £150 off their electricity bills each winter.
- Moving away from fossil fuel boilers - The government aims, by the mid-2030s, for all newly installed heating systems to be low-carbon or to be appliances that it is confident can be converted to a clean fuel supply.
- Supporting North Sea oil and gas transition - The white paper notes the importance of supporting the North Sea oil and gas transition for the people and communities most affected by the move away from fossil fuels. The government aims to

¹⁷⁶ HM Government (2021). The Energy Performance of Buildings Regulations. (see <https://www.legislation.gov.uk/uksi/2012/3118/contents/made>).

¹⁷⁷ Department for Business, Energy & Industrial Strategy (2020). Energy white paper: Powering our net zero future. (see: <https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future>)

achieve this by ensuring that the expertise of the oil and gas sector be drawn on in developing CCS and hydrogen production to provide new green jobs for the future.

B.229 Planning Act 2008¹⁷⁸: The Planning Act 2008 was amended under the Environmental Assessments and Miscellaneous Planning (EU Exit) Regulations 2018. Section 182 places a legal duty on local planning authorities to ensure that their development plan documents include policies to ensure that development and use of land in their area contributes to the mitigation of, and adaptation to, climate change.

B.230 Planning and Energy Act (2008)¹⁷⁹: enables local planning authorities to set requirements for carbon reduction and renewable energy provision. It should be noted that while the Housing Standards Review proposed to repeal some of these provisions, at the time of writing there have been no amendments to the Planning and Energy Act.

B.231 Climate Change Act 2008¹⁸⁰: Sets targets for UK greenhouse gas emission reductions of at least 100% by 2050 and CO2 emission reductions of at least 26% by 2015, against a 1990 baseline (in 2008 the target was set at 80%, however the target has recently been amended in 2019 by Statutory Instrument No.1056 to 100%).

B.232 Flood and Water Management Act (2010)¹⁸¹: Sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

B.233 Environment Act, Government Legislation (1995)¹⁸²: The act notes the establishment of the Environment Agency and the Scottish Environment Protection Agency. It provides guidance on these agencies and sets environmental management standards.

B.234 The UK Renewable Energy Strategy¹⁸³: Sets out the ways in which we will tackle climate change by reducing our CO2 emissions through the generation of a renewable electricity, heat and transport technologies.

B.235 The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK¹⁸⁴: Aims to realise the wider energy efficiency potential that is available in the UK economy by maximising the potential of existing dwellings by implementing 21st century energy management initiatives on 19th century homes.

B.236 The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate¹⁸⁵: Sets out visions for the following sectors:

- People and the Built Environment – “to promote the development of a healthy, equitable and resilient population, well placed to reduce the harmful health impacts of climate change...buildings and places (including built heritage) and the people who live and work in them are resilient and organisations in the built environment sector have an increased capacity to address the risks and make the most of the opportunities of a changing climate.”
- Infrastructure – “an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate.”
- Natural Environment – “the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides.”
- Business and Industry – “UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change.”

¹⁷⁸ HM Government (2008). Planning Act 2008. (see <http://www.legislation.gov.uk/ukpga/2008/29/contents>).

¹⁷⁹ HM Government (2008). Planning and Energy Act 2008. (see <https://www.legislation.gov.uk/ukpga/2008/21>).

¹⁸⁰ HM Government (2008). Climate Change Act 2008. (see https://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga_20080027_en.pdf).

¹⁸¹ HM Government (2010). Flood and Water Management Act 2010. (see http://www.legislation.gov.uk/ukpga/2010/29/pdfs/ukpga_20100029_en.pdf).

¹⁸² HM Government (1995). Environment Act. (see <http://www.legislation.gov.uk/ukpga/1995/25/contents>).

¹⁸³ HM Government (2009). The UK Renewable Energy Strategy. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228866/7686.pdf).

¹⁸⁴ Department of Energy & Climate Change (2012). The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/65602/6927-energy-efficiency-strategy--the-energy-efficiency.pdf).

¹⁸⁵ HM Government (2018). The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727252/national-adaptation-programme-2018.pdf).

- Local Government – “Local government plays a central role in leading and supporting local places to become more resilient to a range of future risks and to be prepared for the opportunities from a changing climate.”

B.237 UK Climate Change Risk Assessment 2017¹⁸⁶: Sets out six priority areas needing urgent further action over the next five years in order to minimise risk from the effects of climate change. These priority areas include: flooding and coastal change risk to communities, businesses and infrastructure; risks to health, wellbeing and productivity from high temperatures; risk of shortages in the public water supply and for agriculture, energy generation and industry; risks to natural capital; risks to domestic and international food production and trade; and new and emerging pests and diseases and invasive species.

B.238 Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England¹⁸⁷: This Strategy sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are to:

- Manage the risk to people and their property.
- Facilitate decision-making and action at the appropriate level – individual, community or local authority, river catchment, coastal cell or national.
- Achieve environmental, social and economic benefits, consistent with the principles of sustainable development.

B.239 A Green Future: Our 25 Year Plan to Improve the Environment¹⁸⁸: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: using and managing land sustainably; and protecting and improving our global environment. Actions that will be taken as part of these two key areas are as follows:

- Using and managing land sustainably:
 - Take action to reduce the risk of harm from flooding and coastal erosion including greater use of natural flood management solutions.
- Protecting and improving our global environment:
 - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.

B.240 The national flood and coastal erosion risk management strategy for England (2011)¹⁸⁹: This Strategy builds on existing approaches to flood and coastal risk management and promotes the use of a wide range of measures to manage risk. The strategy forms the framework within which communities have a greater role in local risk management decisions and sets out the Environment Agency's strategic overview role in flood and coastal erosion risk management.

B.241 Suffolk Climate Action Plan (2017)¹⁹⁰: This is the third 'Suffolk Climate Action Plan' produced by the Suffolk Climate Change Partnership. The Plan presents the Partners' commitment to facilitate a reduction in absolute carbon emissions in Suffolk of 25% on 2010 levels by 2025 and 75% by 2050, in line with the UK Climate Change Act 2008.

¹⁸⁶ HM Government (2017). UK Climate Change Risk Assessment. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/584281/uk-climate-change-risk-assess-2017.pdf).

¹⁸⁷ HM Government (2011). Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228898/9780108510366.pdf).

¹⁸⁸ HM Government (2018). A Green Future: Our 23 Year Plan to Improve the Environment. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf).

¹⁸⁹ Environment Agency (2011). Understanding the risks, empowering communities, building resilience. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228898/9780108510366.pdf).

¹⁹⁰ Suffolk County Council (2017). Suffolk Climate Action Plan. (see <http://www.greensuffolk.org/assets/Greenest-County/SCCP/Climate-Change/Suffolk-Climate-Action-Plan-3.pdf>).

Sub-national

B.242 Anglian river basin district Flood Risk Management Plan 2021-27¹⁹¹: The plan determines the risk of flooding from rivers, the sea, surface water, groundwater and reservoirs in the Anglian river basin district. Risk management authorities can use the plan to manage flood and coastal erosion risk.

B.243 Transforming Suffolk, Suffolk's Community Strategy 2008 to 2028¹⁹²: Sets out ambitions for Suffolk to be recognised for its outstanding environment and quality of life for all. The strategy aims to help make Suffolk the greenest county by enhancing the natural environment while also being an exemplar when tackling climate change.

B.244 Suffolk Climate Emergency Plan (2021)¹⁹³: This Plan has been agreed by Suffolk's Public Sector Leaders and will support a commitment to a green economic recovery in Suffolk as well as addressing the urgent need to deal with the climate emergency.

B.245 Suffolk Flood Risk Management Strategy (2016)¹⁹⁴: Aims to impact the activities of all flood risk management authorities and is an important tool to help everyone manage flood risk. The relevant companies and bodies have a duty with regards to the strategy. The strategy focuses on local flooding from surface water, ground water or ordinary water course such as ditches and streams.

B.246 East Suffolk Catchment Flood Management Plan 2009¹⁹⁵: The plan has assessed inland flood risk from rivers, ground water, surface water and tidal flooding within East Suffolk. The plan establishes flood risk management policies which will deliver sustainable flood risk management.

B.247 Great Ouse Catchment Flood Management Plan 2011¹⁹⁶: The plan has assessed inland flood risk from rivers, ground water, surface water and tidal flooding within Great Ouse. The plan establishes flood risk management policies which will deliver sustainable flood risk management.

B.248 North Essex Catchment Flood Management Plan 2009¹⁹⁷: The plan has assessed inland flood risk from rivers, ground water, surface water and tidal flooding within North Essex. The plan establishes flood risk management policies which will deliver sustainable flood risk management.

B.249 Broadland Rivers Catchment Flood Management Plan 2009¹⁹⁸: The plan has assessed inland flood risk from rivers, ground water, surface water and tidal flooding within Broadland Rivers. The plan establishes flood risk management policies which will deliver sustainable flood risk management.

B.250 Sudbury and Great Cornard Surface Water Management Plan 2019¹⁹⁹: The plan is a study to understand the flood risk in the local area, identify a range of options to manage the risk and then implement and review the action plan.

B.251 Local Energy East Strategy (2018)²⁰⁰: The three Local Enterprise Partnership (LEP) areas of Cambridgeshire and Peterborough, Hertfordshire and New Anglia have joined together to create a tri-LEP area project. The Strategy sets out the tri-LEP's collective ambitions to 2030 based on the following themes: (1) clean economic growth; (2) housing growth and commercial site infrastructure; (3) secure, local, affordable, low-carbon consumption; and (4) clean transport networks.

¹⁹¹ Environment Agency (2022). Anglian river basin district Flood Risk Management Plan. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1118190/Anglian-FRMP-2021-2027.pdf).

¹⁹² Suffolk Strategic Partnership (2008). Transforming Suffolk 2008-2028. (see https://www.ipswich.gov.uk/sites/default/files/scd07_-_suffolk_community_strategy.pdf).

¹⁹³ Suffolk County Council (2021). The Suffolk Climate Emergency Plan. (see <https://www.suffolk.gov.uk/asset-library/imported/suffolk-climate-emergency-plan.pdf>).

¹⁹⁴ Suffolk Flood Risk Management Partnership (2018). Suffolk Flood Risk Management Strategy. (see <http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/2018-Strategy-Documents/2016-04-Suffolk-Flood-Risk-Management-Strategy-v12.pdf>).

¹⁹⁵ Environment Agency (2009). East Suffolk Catchment Flood Management Plan. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/288886/East_Suffolk_Catchment_Flood_Management_Plan.pdf).

¹⁹⁶ Environment Agency (2011). Great Ouse Catchment Management Plan. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/288877/Great_Ouse_Catchment_Flood_Management_Plan.pdf).

¹⁹⁷ Environment Agency (2009). North Essex Catchment Flood Management Plan. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/288888/North_Essex_Catchment_Flood_Management_Plan.pdf).

¹⁹⁸ Environment Agency (2009). Broadland Rivers Catchment Flood Management Plan: Broadland Rivers Catchment Flood Management Plan 2009. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/288882/Broadland_Rivers_Catchment_Flood_Management_Plan.pdf).

¹⁹⁹ BMT (2019). Sudbury and Great Cornard Surface Water Management Plan. (see <http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Surface-Water-Management-Plans/FINALSudburyandGreatCornardSWMPv3.pdf>).

²⁰⁰ Tri-LEP (2018). Local Energy East Strategy. (see <https://www.energyhub.org.uk/wp-content/uploads/2019/09/LEE-Energy-Strategy.pdf>).

B.252 Carbon Reduction Management Plan (2020)²⁰¹: The plan comprises a number of proposals that set the foundations for how Babergh and Mid Suffolk District Councils will conduct their work going forwards. The plan has key actions that will take place in the short term, with the ability to start work immediately on longer term aspirations so that they can be timetabled into later versions of the plan. There are clear actions around energy, fuel and working remotely that will see the Councils working very differently. Some actions require a change in culture, such as removing paper and working more virtually.

Current baseline

B.253 In Suffolk, climate change poses particular serious risks as the county is characterised by its long, low-lying coastline. The ageing population, alongside children, will be particularly at risk from climate change as rising temperatures in the summer coupled with milder temperatures during winter months will become increasingly detrimental. There will be an increase in the intensity and frequency of extreme weather events as a result of climate change.

Climate emergency

B.254 In July 2019, BMSDC declared a Climate Emergency. The Environment and Climate Change Task Force was subsequently set up to look at the climate challenge being faced in both Districts, and to explore ways the Councils can work towards their ambition to become carbon neutral by 2030. Following engagement with environmental experts, the task force presented their recommendations to cabinets in July 2020, the proposals of which were unanimously approved, forming the two councils' first Carbon Reduction Management Plan²⁰².

Climate change mitigation

B.255 Between 2005 and 2017 in Babergh District, per capita carbon emissions fell from 8.1 tonnes to 5.8. In Mid Suffolk District, per capita emissions are higher and fell from 9.5 to 6.3 tonnes over the same period. As of 2016, the average for Suffolk County was 5.5 tonnes per capita, and the national average was 5.3 tonnes per capita. Therefore, both Districts are underperforming against the national and regional averages.

B.256 As set out in **Table B.14**, both Babergh and Mid Suffolk achieved overall reductions in carbon emissions between 2005 and 2017, at 37% and 26% respectively. In both cases, these reductions were mostly due to progress in reducing emissions from domestic sources, closely followed by industrial and commercial sectors, with minimal progress on transport emissions. Transport makes the largest contribution to carbon emissions in both Districts.

B.257 The Suffolk Climate Change Partnership, which consists of Suffolk's local authorities and the Environment Agency, working with other organisations locally, published a Suffolk Climate Action Plan²⁰³ in 2017. According to this document, the County is trending around a 32% reduction in absolute emissions between 2010 and 2025, against their target of 35%.

B.258 The proportion of emissions in the East of England in comparison to other regions was approximately 9.3% in 2017, which made the East of England the fourth highest emitter behind the South East (12.5%), the North West (11.2%) and Yorkshire and the Humber (10.2%)²⁰⁴.

Between 2005 and 2017, the East of England has seen a percentage decrease of 28% in total CO₂ emissions. In 2005, total emissions were 45 Mt CO₂ (Metric Tons of Carbon Dioxide) and in 2017 total emission were 33 Mt CO₂²⁰⁵.

²⁰¹ BMSDC (2020). Appendix A – Carbon Reduction Management Plan. (see <https://baberghmidsuffolk.moderngov.co.uk/documents/s19374/Appendix%20A%20-%20Carbon%20Reduction%20Management%20Plan.pdf>).

²⁰² BMSDC (2020). Appendix A – Carbon Reduction Management Plan. (see <https://baberghmidsuffolk.moderngov.co.uk/documents/s19374/Appendix%20A%20-%20Carbon%20Reduction%20Management%20Plan.pdf>).

²⁰³ Suffolk Climate Change Partnership (2017). Suffolk Climate Action Plan: Fostering business and community resilience, reducing carbon emission and increasing local economic growth. (see <http://www.greensuffolk.org/assets/Greenest-County/SCCP/Climate-Change/Suffolk-Climate-Action-Plan-3.pdf>).

²⁰⁴ Department for Business, Energy & Industrial Strategy (2017). UK local authority carbon dioxide emission estimates. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/812139/Local_authority_2017_greenhouse_gas_emissions_statistical_release.pdf).

²⁰⁵ Department for Business, Energy & Industrial Strategy (2017). UK local authority carbon dioxide emission estimates. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/812139/Local_authority_2017_greenhouse_gas_emissions_statistical_release.pdf).

Table B.10: Carbon dioxide emissions in Babergh and Mid Suffolk Districts (shown as kilo tonnes)

Year	Industrial and Commercial	Domestic	Transport	Total
Babergh				
2005	231.80	227.80	257.50	904.20
2017	151.80	140.90	258.00	567.70
% of Total (2017)	27%	25%	45%	
Change (2005-2017)	-35%	-38%	+0.2%	-37%
Mid Suffolk				
2005	332.20	245.90	305.10	863.70
2017	214.10	151.20	301.90	640.00
% of Total (2017)	33%	24%	47%	
Change (2005-2017)	-36%	-39%	-%	-26%

B.259 According to both Councils' Climate Change and Biodiversity Annual Reports^{206,207}, the Council's two largest carbon emitters were their leisure centres and waste vehicles. In response to this Babergh and Mid Suffolk have become the first rural UK councils to switch its fleet to Hydrotreated Vegetable Oil, which is expected to result in a 90% reduction in emissions. Further to this, the Councils' two leisure centres have transferred to certified low carbon tariffs for electricity use.

B.260 With regard to renewable energy generation, 1,100 Babergh owned homes and 900 Mid Suffolk owned homes have had solar panels installed to generate electricity. Authorities through the Suffolk Solar Together scheme offer residents discounted rates for the installation of solar panels for their homes. Between April 2019 and November 2021 Babergh and Mid Suffolk installed 135 and 114 Air Source Heat Pumps in council owned homes, respectively. A number of these have been funded through the Warm Homes Fund^{208,209}.

Climate change adaptation

B.261 The Met Office has released the UK Climate Projections 2018 study (UKCP18), which provides up to date information on how the climate of the UK is expected to change in the period to the end of the 21st Century. In the highest emissions scenario, summer temperatures in the UK could be 5.4°C warmer by 2070 than the average summer between 1981 and 2000. Average summer rainfall would fall by 47% in this scenario. Winters could be up to 4.2°C warmer, with up to 25% more rainfall by 2070.

B.262 Changes to the climate will bring new challenges to BMSDC's natural environments. Hotter, drier summers may have adverse health impacts and may exacerbate the adverse environmental effects of air and water pollution. Fluvial flooding is significant within Babergh and Mid Suffolk and is prevalent across much of the district. Significant rivers and tributaries that contribute towards flood risk within the district include, but are not limited to, the Stour, Gipping, Waveney, Brett, Dove and Deben Rivers. In addition, rainwater frequently drains into underground sewer systems, which can become overwhelmed during storm events and become blocked, resulting in flooding of the surrounding area. Warmer, wetter winters and more intense rainfall could lead to more frequent and severe flooding events, both from watercourses breaching their banks and from surface water run-off and rising groundwater. There are several rivers in the plan area that are tidally influenced. In the south east corner of Babergh district, there is a risk of tidal flooding from the Stour and Orwell estuaries. Tidal flooding should be

²⁰⁶ Babergh District Council (2021). Climate Change and Biodiversity Annual Report. (see <https://www.babergh.gov.uk/assets/Environment/Climate-change-and-biodiversity-annual-report-Babergh.pdf>).

²⁰⁷ Mid Suffolk District Council (2021). Climate Change and Biodiversity Annual Report. (see <https://www.babergh.gov.uk/assets/Environment/Climate-change-and-biodiversity-annual-report-Mid-Suffolk.pdf>).

²⁰⁸ Babergh District Council (2021). Climate Change and Biodiversity Annual Report. (see <https://www.babergh.gov.uk/assets/Environment/Climate-change-and-biodiversity-annual-report-Babergh.pdf>).

²⁰⁹ Mid Suffolk District Council (2021). Climate Change and Biodiversity Annual Report. (see <https://www.babergh.gov.uk/assets/Environment/Climate-change-and-biodiversity-annual-report-Mid-Suffolk.pdf>).

considered for the present as well as the future, due to predicted increases in sea level²¹⁰. There are extensive low-lying areas of coastline at high risk of tidal flooding and expected future sea level rise will have significant implications for new and existing development situated in these areas²¹¹.

B.263 Figure B.15 shows Flood Risk Zones 2 and 3 in the Districts, which are those areas at greatest risk of flooding from either rivers or the sea.

B.264 A changing climate may place pressure on some native species and create conditions suitable for new species, including invasive non-native species. Protection and enhancement of the natural landscape is critical to mitigating and adapting to climate change given its significant role in carbon sequestration, flood storage/management and maintaining water quality.

B.265 The Councils also aim to help the Government deliver the 25-year Environment Plan and help increase the powers and resources available to local authorities to address climate change²¹².

²¹⁰ JBA Consulting (2020). Babergh & Mid Suffolk Level 1 Strategic Flood Risk Assessment Draft Report.

²¹¹ Suffolk Coastal District Council and Ipswich Borough Council (2019). Cross Boundary Water Cycle Study. (see https://www.ipswich.gov.uk/sites/default/files/cross-boundary-water-cycle-study_jan_2019.pdf).

²¹² BMSDC (2020). Climate Declaration. (see <https://www.babergh.gov.uk/news/councils-support-2030-carbon-neutral-ambitions/>).

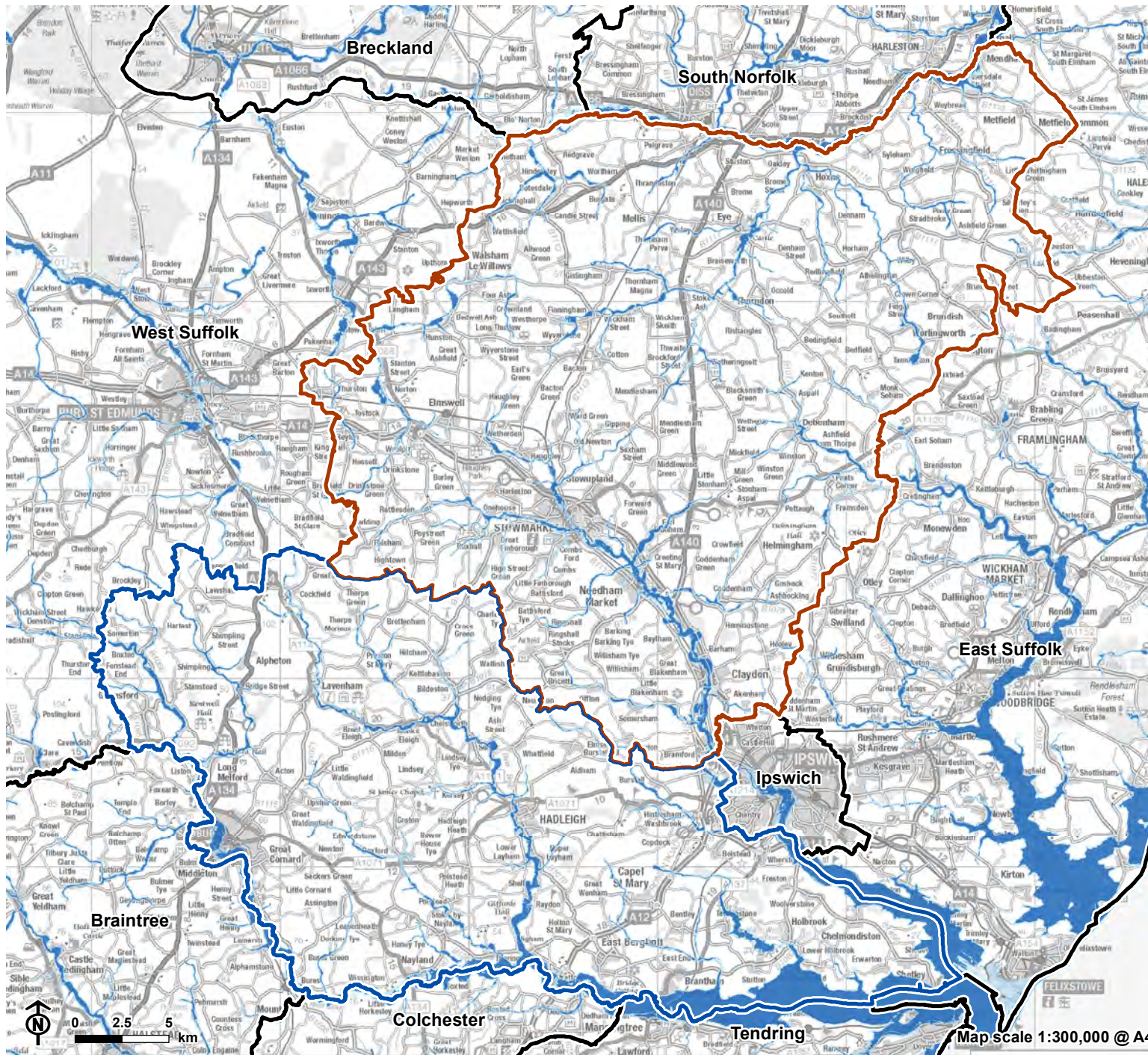


Figure B.15: Flood Risk (Flood Zones 2 and 3)

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- Flood zone 2
- Flood zone 3

Biodiversity

Policy context

International

B.266 International Convention on Wetlands (Ramsar Convention) (1976)²¹³: International agreement with the aim of conserving and managing the use of wetlands and their resources.

B.267 European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979)²¹⁴: Aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

B.268 International Convention on Biological Diversity (1992)²¹⁵: International commitment to biodiversity conservation through national strategies and action plans.

B.269 United Nations Declaration on Forests (New York Declaration) (2014)²¹⁶: international commitment to cut natural forest loss by 2020 and end loss by 2030.

B.270 United Nations Declaration on Forests and Land Use (COP26 Declaration) (2021)²¹⁷: international commitment to halt and reverse forest loss and land degradation by 2030 while delivering sustainable development and promoting an inclusive rural transformation.

National

B.271 A requirement of the NPPF's (2021)²¹⁸ environmental objective is that the planning system should contribute to protecting and enhancing the natural environment including helping to improve biodiversity and using natural resources prudently. In support of this aim the framework states that Local Plans should “*identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks*” and should also “*promote the conservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*”

B.272 The framework requires that plans should take a strategic approach in terms of “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”.

B.273 The NPPF is supported by planning practice guidance relating to:

- **Natural environment (2019)**²¹⁹ highlights key issues in implementing policy to protect and enhance the natural environment, agricultural land, soils and brownfield land of environmental value, green infrastructure, biodiversity, geodiversity, ecosystems and landscapes.

B.274 National Planning Practice Guidance²²⁰: Supports the NPPF by requiring Local Plans to include strategic policies that conserve and enhance the natural environment through sustainable development.

B.275 The Environment Act 2021²²¹ sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. Biodiversity elements in the Act include:

²¹³ United Nations (1976). (see http://portal.unesco.org/en/ev.php-URL_ID=15398&URL_DO=DO_TOPIC&URL_SECTION=201.html).

²¹⁴ Council of Europe (1979). Convention on Wetlands of International Importance especially as Waterfowl Habitat. (see <https://www.coe.int/en/web/conventions/full-list/-/conventions/rms/0900001680078aff>).

²¹⁵ United Nations (1992). Convention on the Conservation of European Wildlife and Natural Habitats. (<https://www.cbd.int/doc/legal/cbd-en.pdf>).

²¹⁶ United Nations (2014). Declaration on Forests (New York Declaration). (see https://www.undp.org/content/dam/undp/library/Environment%20and%20Energy/Forests/New%20York%20Declaration%20on%20Forests_DAA.pdf).

²¹⁷ COP26 United Nations Declaration on Forests and Land Use (2021).

²¹⁸ Ministry of Housing, Communities and Local Government (2021). National Planning Policy Framework [online].

(see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf).

²¹⁹ Ministry of Housing, Communities and Local Government (2019). Natural Environment. (see <https://www.gov.uk/guidance/natural-environment>)

²²⁰ Ministry of Housing, Communities and Local Government (last updated 1 October 2019). Planning Practice Guidance. (see <https://www.gov.uk/government/collections/planning-practice-guidance>).

²²¹ HM Government (2021). Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>).

- Strengthened biodiversity duty. Both onsite and offsite enhancements must be maintained for at least 30 years after completion of a development.
- Biodiversity net gain to ensure developments deliver at least 10% increase in biodiversity
- Local Nature Recovery Strategies to support a Nature Recovery Network.
- Duty upon Local Authorities to consult on street tree felling.
- Strengthen woodland protection enforcement measures.
- Conservation Covenants.
- Protected Site Strategies and Species Conservation Strategies to support the design and delivery of strategic approaches to deliver better outcomes for nature.
- Prohibit larger UK businesses from using commodities associated with wide-scale deforestation.
- Requires regulated businesses to establish a system of due diligence for each regulated commodity used in their supply chain, requires regulated businesses to report on their due diligence, introduces a due diligence enforcement system.

B.276 Natural Environment and Rural Communities Act 2006²²²: Places a duty on public bodies to conserve biodiversity.

B.277 Biodiversity 2020: A strategy for England's wildlife and ecosystem services²²³: Guides conservation efforts in England up to 2020 by requiring a national halt to biodiversity loss, supporting healthy ecosystems and establishing ecological networks. The Strategy includes 22 priorities which include actions for the following sectors: Agriculture, Forestry, Planning & Development, Water Management, Marine Management, Fisheries, Air Pollution and Invasive Non-Native Species.

B.278 Biodiversity offsetting in England Green Paper²²⁴: Biodiversity offsets are conservation activities designed to compensate for residual losses. The Green Paper sets out a framework for offsetting.

B.279 A Green Future: Our 25 Year Plan to Improve the Environment (2018)²²⁵: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: recovering nature and enhancing the beauty of landscapes; securing clean, productive and biologically diverse seas and oceans; and protecting and improving our global environment. Actions that will be taken as part of these three key areas are as follows:

- Recovering nature and enhancing the beauty of landscapes:
 - Develop a Nature Recovery Network to protect and restore wildlife and provide opportunities to re-introduce species that have been lost from the countryside.
- Securing clean, healthy, productive and biologically diverse seas and oceans:
 - Achieve a good environmental status of the UK's seas while allowing marine industries to thrive and complete our economically coherent network of well-managed marine protected areas.
- Protecting and improving our global environment:
 - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.
 - Support and protect international forests and sustainable agriculture.

²²² HM Government (2006). Natural Environment and Rural Communities Act 2006. (see http://www.legislation.gov.uk/ukpga/2006/16/pdfs/ukpga_20060016_en.pdf).

²²³ Department for Environment, Food and Rural Affairs (2011). Biodiversity 2020: A strategy for England's wildlife and ecosystem. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf).

²²⁴ Department for Environment, Food and Rural Affairs (2013). Biodiversity offsetting in England Green Paper. (see https://consult.defra.gov.uk/biodiversity/biodiversity_offsetting/supporting_documents/20130903Biodiversity%20offsetting%20green%20paper.pdf).

²²⁵ HM Government (2018). A Green Future: Our 23 Year Plan to Improve the Environment.

(https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf).

Sub-national

B.280 Babergh & Mid-Suffolk District Councils Biodiversity Action Plan (2020)²²⁶: sets out how BMSDC aims to protect and strengthen plant life and local wildlife in the district. This includes proposals of environment mapping, tree and hedge planting, meadow planting, a green burial site, an SPD, and bio-diversity campaigning.

B.281 Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy – Technical Report (2019)²²⁷: Sets out a strategy for sustainable housing growth whilst also adequately protecting European wildlife sites from harm.

B.282 Suffolk Coast European Sites Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (2019)²²⁸: This Strategy sets out a tariff based approach to mitigating the impact of recreational disturbance on European Sites resulting from increased housing development across the local authority areas (East Suffolk Council, Ipswich Borough Council and BMSDC). It summarises the requirements of Suffolk Coast RAMS, including the per-dwelling tariff, and provides a framework for implementing those provisions.

B.283 Suffolk's Nature Strategy (2015)²²⁹: This Strategy describes the challenges and opportunities the natural environment presents. It outlines the key natural environment priorities for the County, whilst also setting out how the landscapes and wildlife in Suffolk contribute to economic growth and health and wellbeing.

B.284 In July 2019 Mid Suffolk District Council pledged to help protect existing wildlife and biodiversity in the District²³⁰. This will start with a review of existing potential wildlife corridors in the District and examining ways in which the corridors can be enhanced, working as part of the climate change taskforce.

B.285 In September 2019 Babergh District Council pledged to protect wildlife, biodiversity and natural habitats which included wildflower verges and free trees for families, in addition to producing a map showing Babergh's wildlife networks²³¹.

B.286 The Climate Change Task Force mentioned earlier focuses biodiversity, as well as climate change mitigation. The Task Force considers ways in which both the Councils and partnerships can protect and improve the environment and biodiversity. This includes considering actions through their own operations and key stakeholders or partners.

B.287 Babergh and Mid Suffolk also provide details of national ecological guidance on their website, such as construction near protected areas and wildlife and protected species guidance.

B.288 A Green Infrastructure Framework for Babergh District (August 2012)²³²: This Framework identifies key opportunities for the enhancement of Green Infrastructure and future provision/connections in a number of areas, including Ipswich, Hadleigh and Sudbury/Great Cornard/Chilton.

Current baseline

B.289 There is a need to maintain and develop BMSDC's network of high-quality habitats. In Babergh District are the Orwell and Stour estuaries, which are found on the eastern and south-eastern sides of the District. They have valued wildlife habitats and a distinct character. Both estuaries 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.

²²⁶ BMSDC (2020). Biodiversity Action Plan. (see <https://baberghmidsuffolk.moderngov.co.uk/documents/s20689/Appendix%20A%20-%20Biodiversity%20Action%20Plan.pdf>).

²²⁷ Footprint Ecology (2019). Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy. (see <http://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf>).

²²⁸ Ipswich Borough Council (2019). Suffolk Coast European Sites Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document. (see https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/suffolk_coast_rams_spd_1.pdf).

²²⁹ Suffolk County Council (2015). Suffolk's Nature Strategy. (see <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/suffolks-countryside-and-wildlife/Suffolks-Nature-Strategy-2015.pdf>).

²³⁰ BMSDC (2019). Council takes steps to protect wildlife. (see <https://www.midsuffolk.gov.uk/news/council-takes-steps-to-protect-wildlife/>).

²³¹ BMSDC (2019). (see <https://www.babergh.gov.uk/news/babergh-pledges-to-protect-wildlife/>).

²³² Babergh District Council (August 2012). A Green Infrastructure Framework for Babergh District. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/GIFramework-Aug2012.pdf>).

B.290 Both Districts contain 41 Sites of Special Scientific Interest (SSSI), one National Nature Reserve (Redgrave & Lopham Fen in Mid Suffolk District), 438 County Wildlife Sites²³³ and 24 Local Nature Reserves²³⁴. The designated biodiversity sites are shown in **Figure B.16**. Ancient Woodland is also present across both Districts (**Figure B.17**).

B.291 Out of the 41 SSSIs, five of them are known for their geological significance. BMSDC also contains two Regionally Important Geological/Geomorphological Sites (RIGS) (see **Land and Water Resources** for more information). Out of the 41 SSSIs, 15 of them are entirely in favourable condition whereas the remainder are not. Out of the 26 SSSIs that are in unfavourable condition, the following SSSIs were found to be partly or entirely within unfavourable condition and declining²³⁵:

- **Cornard Mere, Little Cornard SSSI**: 100% of this SSSI is in unfavourable condition and declining.
- **Creting St. Mary Pits SSSI**: 42.51% of this SSSI is partially destroyed whereas the remainder is in favourable condition.
- **Freston and Cutler's Wood with Holbrook Park SSSI**: This entire SSSI is in unfavourable condition. 8.67% of the SSSI is declining and 61.23% of the SSSI is recovering. There has been no change across the remainder of the SSSI.
- **Gosbeck Wood SSSI**: This Entire SSSI is in unfavourable condition and declining.
- **Hoxne Brick Pit SSSI**: 30.62% of this SSSI is in unfavourable condition and declining, whilst the remainder of the site is in favourable condition and recovering.
- **Kentwell Woods SSSI**: Around 75% of this SSSI is in unfavourable condition with 13.10% declining, 20.23% where there has been no change and 41.52% of which is recovering. The remaining 25% of the site is in favourable condition.
- **Orwell Estuary SSSI**: 11.78% of this SSSI is in unfavourable condition and declining, whilst 9.73% of the site is also in unfavourable condition but there has been no change. The remainder of the site is in favourable condition.
- **Stour Estuary SSSI**: 1.99% of this SSSI is in unfavourable condition and declining, whilst the remainder of the site is in favourable condition.

B.292 In the past year, Babergh and Mid Suffolk have planted 281 trees and 4,690 hedgerow plants have been distributed to town and parish councils for planting and care. At 10 years old, the carbon sequestered from the 291 trees planted will equate to 7,025kg a year, increasingly annually as the trees grow larger^{236,237}.

²³³ County Wildlife Sites (CWSs) have been identified throughout Suffolk and range from small meadows, green lanes, dykes and hedges to much larger areas of ancient woodland, heathland, greens, commons and marsh. CWSs complement statutorily protected areas and nature reserves (such as SSSIs and Local and National Nature Reserves) by helping to maintain habitat links between these sites.

²³⁴ The Local Nature Reserves are statutory designations which have wildlife or geological features that are of special interest to the local area.

²³⁵ Natural England (2020). Designated Sites View. (see <https://designatedsites.naturalengland.org.uk/SiteSearch.aspx>).

²³⁶ Babergh District Council (2021). Climate Change and Biodiversity Annual Report. (see <https://www.babergh.gov.uk/assets/Environment/Climate-change-and-biodiversity-annual-report-Babergh.pdf>).

²³⁷ Mid Suffolk District Council (2021). Climate Change and Biodiversity Annual Report. (see <https://www.babergh.gov.uk/assets/Environment/Climate-change-and-biodiversity-annual-report-Mid-Suffolk.pdf>).

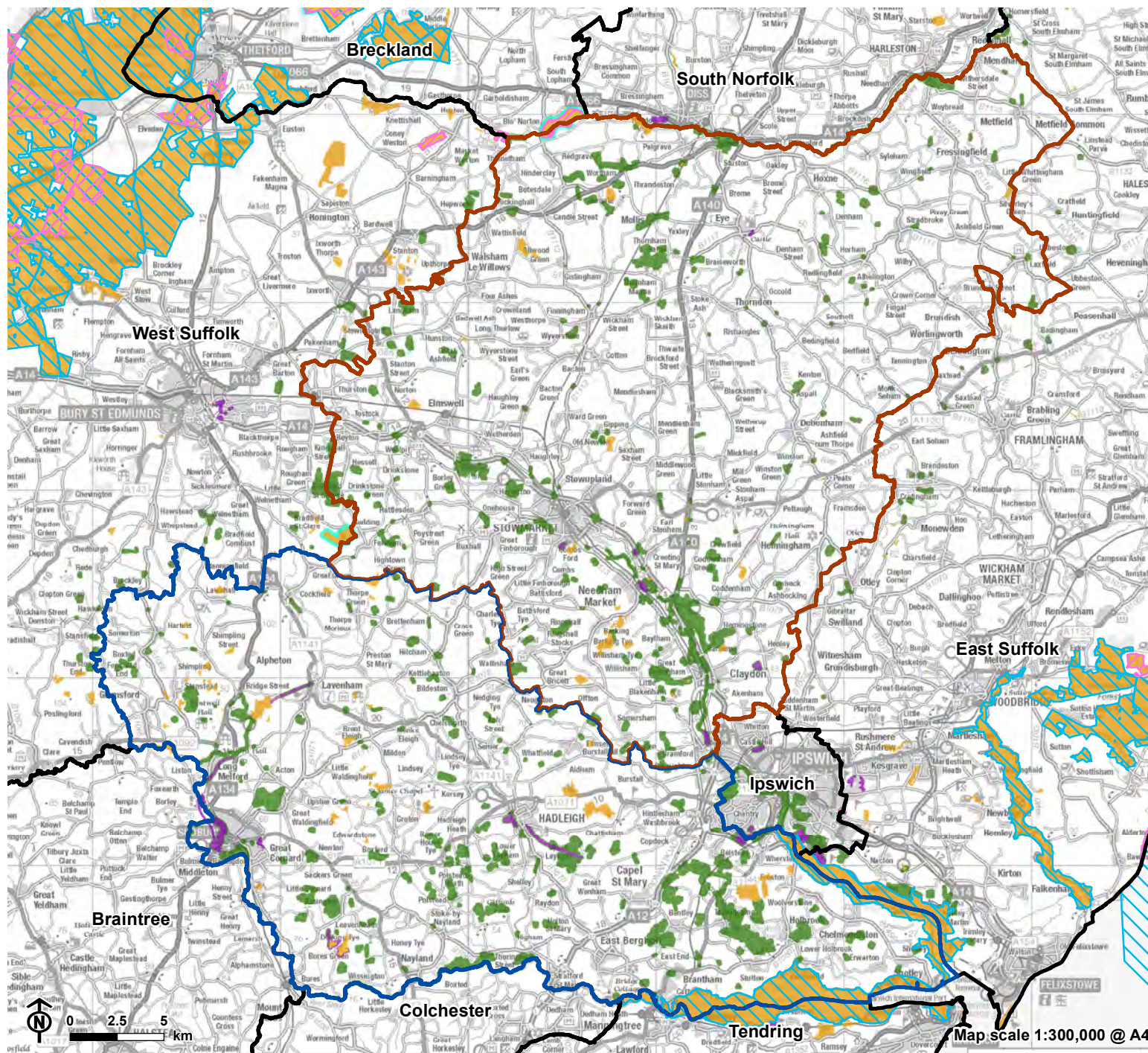


**Figure B.16: Designated Biodiversity
Assets**

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- Special Protection Area
- Special Area of Conservation
- Site of Special Scientific Interest
- National Nature Reserve
- Local Nature Reserve
- County Wildlife Site

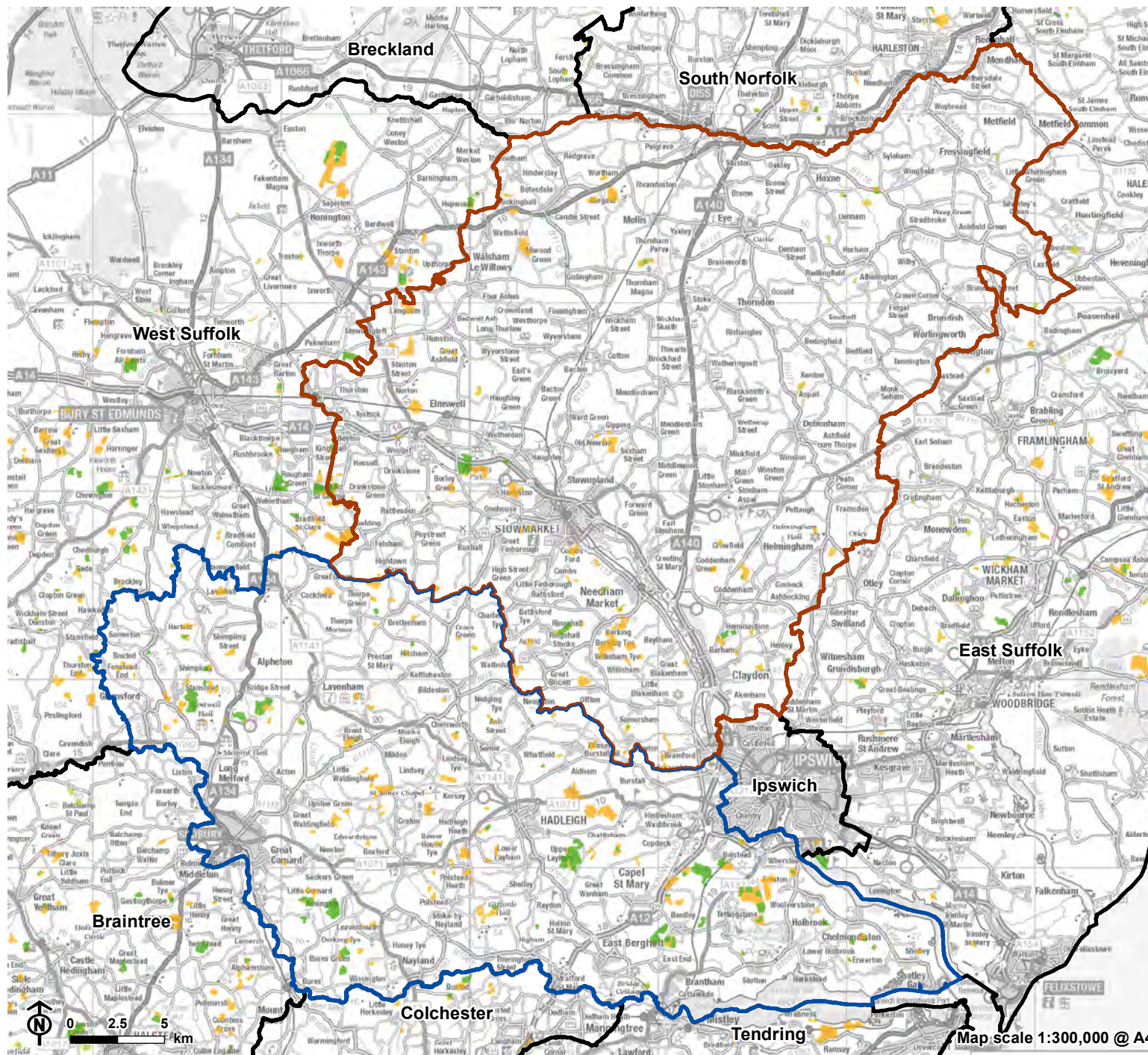


Figure B.17: Ancient Woodland Inventory

- Babergh District
 - Mid Suffolk District
 - Neighbouring local authority
- Ancient Woodland Inventory**
- Ancient & Semi-Natural Woodland
 - Ancient Replanted Woodland

Historic Environment

Policy context

International

B.293 European Convention for the Protection of the Architectural Heritage of Europe (1985)²³⁸: Defines "architectural heritage" and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention.

B.294 Valletta Treaty (1992) formerly the European Convention on the Protection of the Archaeological Heritage (Revisited)²³⁹: Aims to protect the European archaeological heritage "as a source of European collective memory and as an instrument for historical and scientific study".

National

B.295 Of relevance to the approach of the planning system to the historic environment the **NPPF (2021)**²⁴⁰ contains an environmental objective to contribute to the protection and enhancement of the built and historic environment. The document also sets out a strategy to seek "*the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay and other threats.*" Such a strategy is required to take into consideration the desirability of sustaining and enhancing the significance of heritage assets and bringing them into viable use.

B.296 It should also be considerate of the wider benefits of conserving the historic environment, the contribution new development can make in terms of character and distinctiveness and the opportunity for the historic environment to contribute to this character and distinctiveness. Local authorities should also maintain or have access to a historic environment record which is to be supported by up-to-date evidence.

B.297 The NPPF is supported by planning practice guidance relating to:

- **Historic environment (2019)**²⁴¹ advises on enhancing and conserving the historic environment through planning, decision-making, designation, listed building consent processes and consultation.

B.298 National Planning Practice Guidance (PPG)²⁴²: Supports the NPPF by requiring that Local Plans include strategic policies for the conservation and enhancement of the historic environment, including a positive strategy for the conservation and enjoyment of the historic environment. It also states that local planning authorities should identify specific opportunities for conservation and enhancement of heritage assets.

B.299 The Environment Act 2021²⁴³ sets out the UK's new framework for environmental protection. It includes the creation of Conservation Covenant agreements between a landowner and a responsible body for the purposes of conservation. This can include to preserve land as a place of '*archaeological, architectural artistic, cultural or historic interest.*'

B.300 Ancient Monuments & Archaeological Areas Act 1979²⁴⁴: a law passed by the UK government to protect the archaeological heritage of England & Wales and Scotland. Under this Act, the Secretary of State has a duty to compile and maintain a schedule of ancient monuments of national importance, in order to help preserve them. It also creates criminal offences for unauthorised works to, or damage of, these monuments.

²³⁸ Council of Europe (1985). European Convention for the Protection of the Architectural Heritage of Europe. (see <https://rm.coe.int/168007a087>).

²³⁹ Council of Europe (1992). Valletta Treaty. (see <https://rm.coe.int/168007bd25>).

²⁴⁰ Ministry of Housing, Communities and Local Government (2021). National Planning Policy Framework [online]. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf).

²⁴¹ Ministry of Housing, Communities and Local Government (2019). Historic Environment. (see <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>)

²⁴² Ministry of Housing, Communities & Local Government (last updated 1 October 2019). Planning Practice Guidance: (see <https://www.gov.uk/government/collections/planning-practice-guidance>).

²⁴³ HM Government (2021). Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

²⁴⁴ HM Government (1979). Ancient Monuments & Archaeological Areas Act. (see <https://consult.environment-agency.gov.uk/engagement/bostonbarriertwao/results/b.21---ancient-monuments-and-archaeological-areas-act-1979.pdf>).

B.301 Planning (Listed Buildings & Conservation Areas) Act 1990²⁴⁵: An Act of Parliament that changed the laws for granting of planning permission for building works, with a particular focus on listed buildings and conservation areas.

B.302 The Government's Statement on the Historic Environment for England 2010²⁴⁶: Sets out the Government's vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life. Includes reference to promoting the role of the historic environment within the Government's response to climate change and the wider sustainable development agenda.

B.303 The Heritage Statement 2017²⁴⁷: Sets out how the Government will support the heritage sector and help it to protect and care for our heritage and historic environment, in order to maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

B.304 Sustainability Appraisal and Strategic Environmental Assessment Historic England Advice Note 8²⁴⁸: Sets out Historic England's guidance and expectations for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.

Current baseline

Heritage assets

B.305 The Districts have a range of unique historic assets, which give the Districts character and beauty²⁴⁹. These assets include Scheduled Monuments, Registered Parks and Gardens (SAMs) and a range of listed buildings (Grades I, II and II*), as shown in **Figure B.18** and **Figure B.19**. A number of non-designated heritage assets are also located across both Districts.

B.306 In Babergh District, there are 34 Scheduled Ancient Monuments, five registered Historic Parks and Gardens²⁵⁰, 88 Grade I Listed Buildings, 3,173 Grade II Listed Buildings and 188 Grade II* Listed Buildings.

B.307 In Mid Suffolk there are 35 Scheduled Ancient Monuments, two registered Historic Parks and Gardens²⁵¹, 87 Grade I Listed Buildings, 2,710 Grade II Listed Buildings and 1,889 Grade II* Listed Buildings.

B.308 A Conservation Area is defined as "an area of special architectural or historic interest, the character of which it is desirable to preserve or enhance"²⁵². It usually consists of a historic core with a number of listed buildings. There are 60 Conservation Areas altogether in both Districts. The Councils have produced Conservation Area Appraisals, which have been adopted by the Council²⁵³.

B.309 BMSDC's Heritage and Settlement Sensitivity Assessment (2018)²⁵⁴ provides details on the historic landscape of the Districts. The document assesses 42 settlements which have been identified as potential areas of residential expansion. Eight of these settlements are identified as being of cumulatively high value, specifically: Boxford, Debenham, East Bergholt, Eye, Hoxne, Lavenham, Long Melford and Nayland.

²⁴⁵ HM Government (2002). Planning (Listed Buildings & Conservation Areas) Act (1990). (see http://www.legislation.gov.uk/ukpga/1990/9/pdfs/ukpga_19900009_en.pdf).

²⁴⁶ HM Government (2010). The Government's Statement on the Historic Environment for England 2010. (see <https://www.gov.uk/government/publications/the-governments-statement-on-the-historic-environment-for-england>).

²⁴⁷ Department for Digital, Culture Media and Sport (2017). Heritage Statement 2017. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/664657/Heritage_Statement_2017_final_-_web_version_.pdf).

²⁴⁸ Historic England (2016). Sustainability Appraisal and Strategic Environmental Assessment: Historic England Advice Note 8. (see <https://content.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/heag036-sustainability-appraisal-strategic-environmental-assessment.pdf>).

²⁴⁹ BMSDC (2020). Heritage. (see <https://www.midsuffolk.gov.uk/planning/heritage/>).

²⁵⁰ BMSDC (2021-22). Annual Monitoring Report. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/AMR/Babergh-and-Mid-Suffolk-AMR-2021-2022.pdf>).

²⁵¹ BMSDC (2021-22). Annual Monitoring Report. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/AMR/Babergh-and-Mid-Suffolk-AMR-2021-2022.pdf>).

²⁵² BMSDC (2020). Living in a Conservation Area. (see <https://www.midsuffolk.gov.uk/planning/heritage/living-in-a-conservation-area/>).

²⁵³ BMSDC (2020). Heritage. (see <https://www.midsuffolk.gov.uk/planning/heritage/conservation-area-appraisals/>).

²⁵⁴ BMSDC (2018). Heritage and Settlement Sensitivity Assessment. (<https://www.babergh.gov.uk/planning/planning-policy/evidence-base/current-evidence/bmsdc-heritage-and-settlement-sensitivity-assessment/>).

Heritage assets at risk

B.310 Historic England has a Heritage at Risk Register²⁵⁵ which includes historic buildings, sites and conservation areas at risk of being lost through neglect, deterioration or decay²⁵⁶. The Register aims to highlight those places and buildings in greatest need of repair.

B.311 In Babergh, there are two Grade II* buildings that are at risk:

- **Barn north east of Bentley Hall, Bentley Hall Road, Bentley:** very bad condition.
- **Church of St Mary, Fish Pond Hill, Harkstead:** poor condition.

B.312 There are also three Scheduled Monuments in the District that are at risk:

- **Roman villa north east of Rodbridge House, Long Melford:** extensive significant problems.
- **Wissington ring ditch cluster. Nayland-with-Wissington:** extensive significant problems.
- **Wood Hall moated site, Sudbury:** generally unsatisfactory with major localised problems.

B.313 In Mid Suffolk, there are four Grade I Listed Buildings and thirteen Grade II* listed buildings that are at risk:

- **Church of St Mary and St Laurence, The Street, Great Bricett (Grade I):** fair condition.
- **Church of St Mary, Hall Lane, Nettlestead (Grade I):** poor condition.
- **Church of St Margaret, Little Green, Thrandeston (Grade I):** poor condition.
- **Church of St Mary, Church Lane, Yaxley (Grade I):** very bad condition.
- **Badley Hall barn 100 metres south east of Badley Hall, Badley (Grade II*):** poor condition.
- **Badley Hall dovecote 60 metres east of Badley Hall, Badley (Grade II*):** poor condition.
- **Grand Stairs and Grotto, 50 meters west of Shrubland Hall, Barham (Grade II*):** poor condition.
- **Shrubland Hall, including attached Screen Walling on east side and Terraces and Balustrading on south and west sides, Barham (Grade II*):** poor condition.
- **Upper Gun Terrace, 10 meters west of Shrubland Hall, Barham (Grade II*):** poor condition.
- **Poplar Farmhouse, Brome and Oakley (Grade II*):** very bad condition.
- **Grand Stairs and Grotto 50 metres west of Shrubland Hall, Coddtenham (Grade II*):** poor condition.
- **Lower Loggia and attached Balustrading and steps 150 meters west of Shrubland Hall, Coddtenham (Grade II*):** poor condition.
- **Barn 200 metres west of Hall's Farmhouse, Halls Lane, Norton (Grade II*):** poor condition.
- **Church of St Mary, The Street, Horham (Grade II*):** poor condition.
- **Church of St Andrew, Church Road, Redlingfield (Grade II*):** poor condition.
- **Church of All Saints, Church Street, Stadbroke (Grade II*):** very bad condition.
- **Church of All Saints, Church Lane, Stuston (Grade II*):** very bad condition.

B.314 Furthermore, there are 2 Scheduled Monuments in the District that are at risk:

- **Barn at Rook Hall, Eye:** very bad condition.
- **Baylham Roman site, Coddtenham:** extensive significant problems.

²⁵⁵ Historic England (2021). Risk Register.(see <https://historicengland.org.uk/images-books/publications/har-2021-registers/ee-har-register2021/>)**Error! Hyperlink reference not valid.**

²⁵⁶ Historic England (2021). Risk Register.(see <https://historicengland.org.uk/images-books/publications/har-2021-registers/ee-har-register2021/>)**Error! Hyperlink reference not valid.**

B.315 Finally, there is a Registered Park and Garden (Grade I) with 22 listed buildings that partially falls within a Conservation Area. It is generally unsatisfactory with major localised problems.

B.316 The heritage assets at risk are shown in **Figure B.20**.

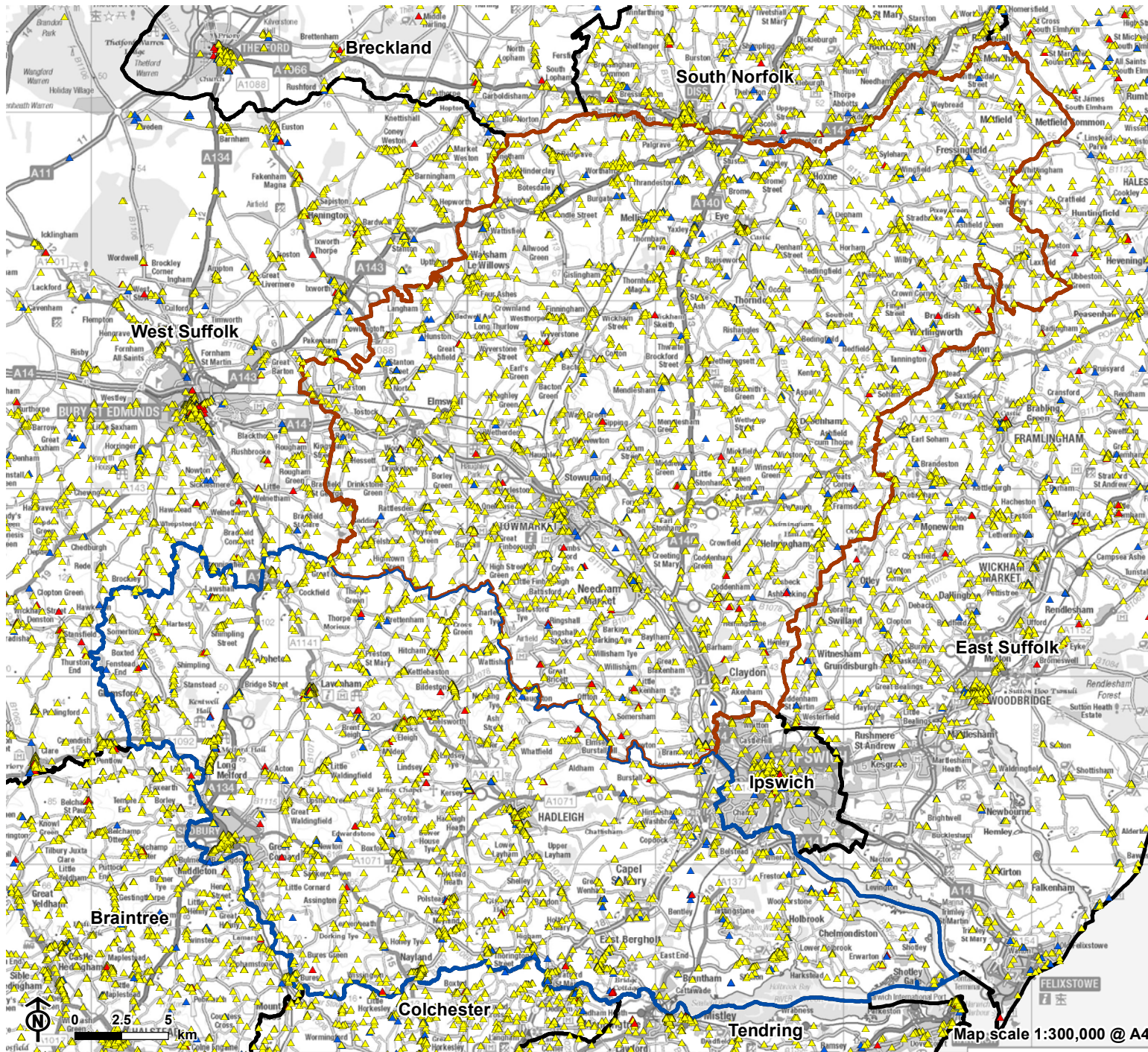


Figure B.18: Listed Buildings

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- ▲ Grade I listed building
- ▲ Grade II* listed building
- ▲ Grade II listed building

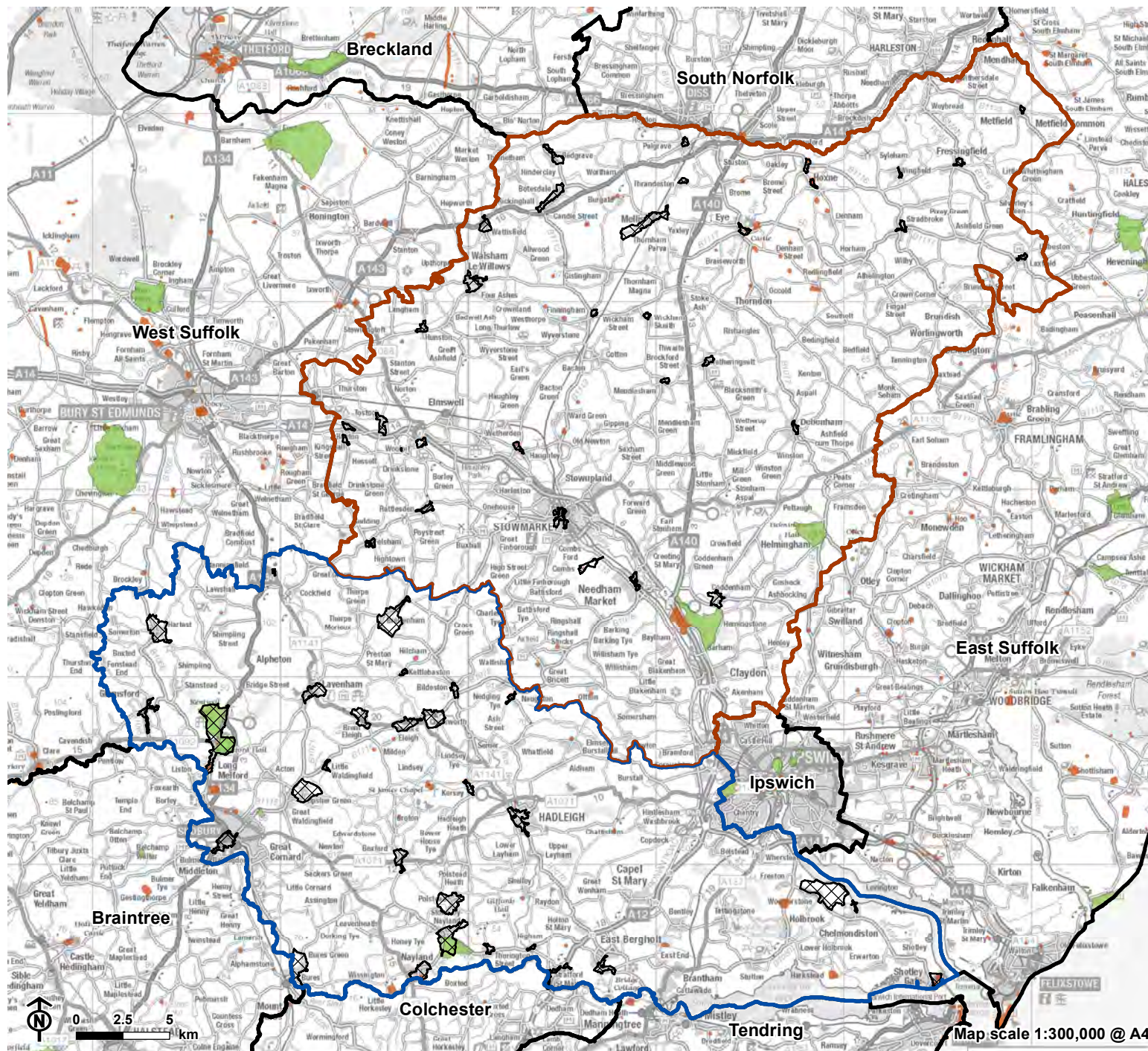


Figure B.19: Heritage Assets

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- Conservation area
- Scheduled monument
- Registered park and garden

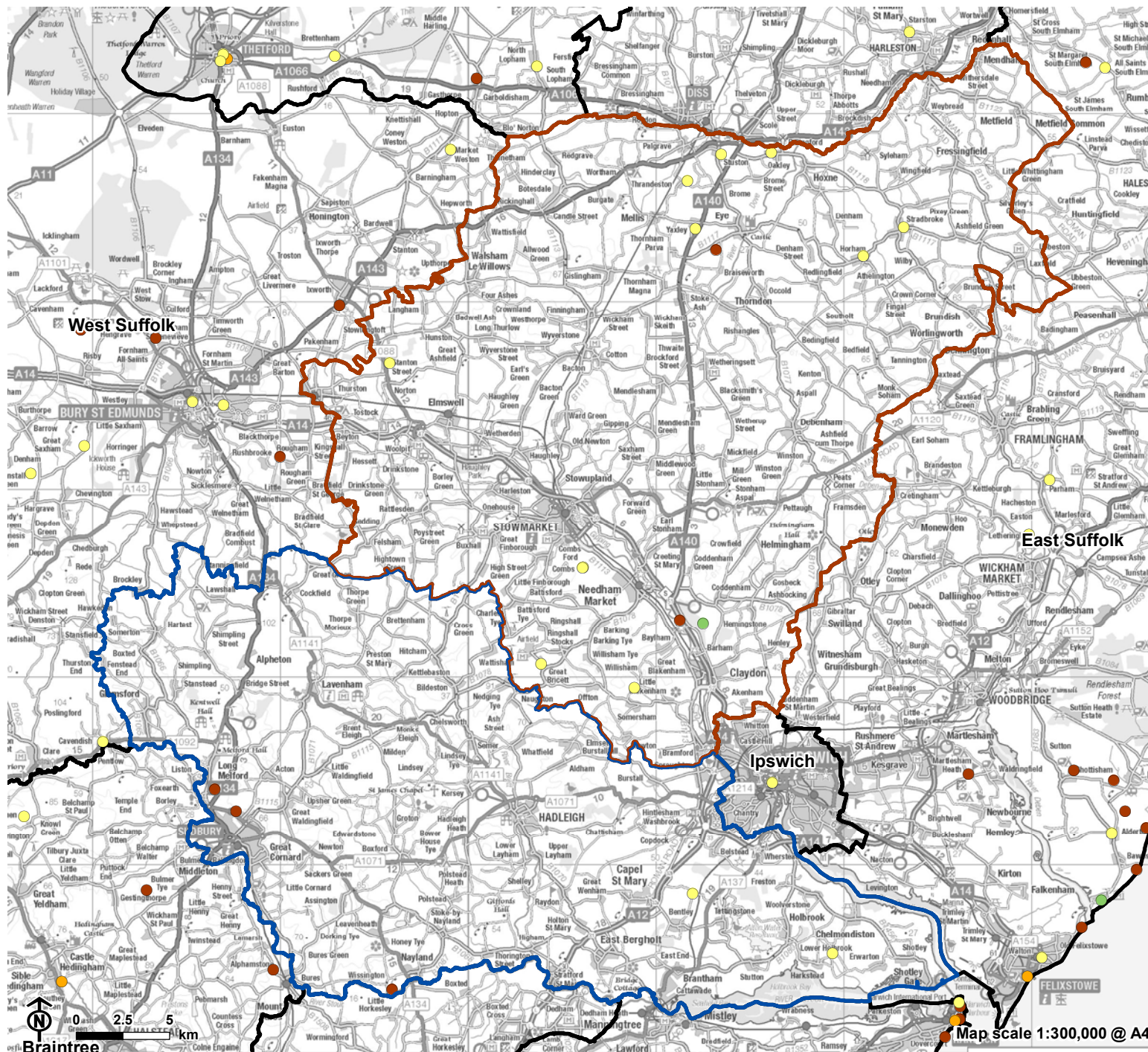


Figure B.20: Heritage Assets at Risk

- Babergh District
- Mid Suffolk District
- Neighbouring local authority

Heritage at risk

- Conservation area
- Listed building
- Registered park and garden
- Scheduled monument

Landscape

Policy context

International

B.317 European Landscape Convention (2002)²⁵⁷: Promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

National

B.318 The NPPF (2021)²⁵⁸ includes as part of its approach to protecting the natural environment, recognition for the intrinsic character and beauty of the countryside, and the wider benefits to be secured from natural capital. Importantly, great weight is to be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty (AONB).

B.319 As part of the approach to achieving well-designed places the NPPF states that planning policies and decisions should ensure that developments “*are sympathetic to local character and history, including the surrounding built environment and landscape setting.*”

B.320 The NPPF is supported by planning practice guidance relating to:

- **Natural environment (2019)**²⁵⁹ highlights key issues in implementing policy to protect and enhance the natural environment, agricultural land, soils and brownfield land of environmental value, green infrastructure, biodiversity, geodiversity, ecosystems and landscapes.
- **Green Belt (2019)**²⁶⁰ provides advice on the role of the Green Belt in the planning system, removal of land from the Green Belt and compensatory improvements.

B.321 National Planning Practice Guidance (PPG)²⁶¹: Updated in 2019 to provide information on how development within the setting of National Parks, the Broads and Areas of Outstanding Natural Beauty should be dealt with. According to the guidance, land within the setting of these areas often makes an important contribution to maintaining their natural beauty. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account.

B.322 The Environment Act 2021²⁶² sets out the UK’s new framework for environmental protection. It includes the creation of Conservation Covenant agreements between a landowner and a responsible body for the purposes of conservation of the natural environment of the land or its natural resources, or to conserve the place or setting of the land for its ‘*archaeological, architectural, artistic, cultural or historic interest.*’

B.323 A Green Future: Our 25 Year Plan to Improve the Environment²⁶³: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: recovering nature and enhancing the beauty of landscapes. Actions that will be taken as part of this key area are as follows:

- Working with AONB authorities to deliver environmental enhancements.
- Identifying opportunities for environmental enhancement of all England’s Natural Character Areas, and monitoring indicators of landscape character and quality.

²⁵⁷ Council of Europe (2000). European Landscape Convention. (see <https://rm.coe.int/1680080621>).

²⁵⁸ Ministry of Housing, Communities and Local Government (2021). National Planning Policy Framework [online]. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf).

²⁵⁹ Ministry of Housing, Communities and Local Government (2019). Natural Environment. (see <https://www.gov.uk/guidance/natural-environment>)

²⁶⁰ Ministry of Housing, Communities and Local Government (2019). Green Belt. (see <https://www.gov.uk/guidance/green-belt>)

²⁶¹ Ministry of Housing, Communities & Local Government (last updated 1 October 2019). Planning Practice Guidance. (see <https://www.gov.uk/government/collections/planning-practice-guidance>).

²⁶² HM Government (2021) Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

²⁶³ HM Government (2018). A Green Future: Our 25 Year Plan to Improve the Environment. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf).

Sub-national

B.324 Joint Babergh & Mid Suffolk Landscape Character Guidance (2015)²⁶⁴: Provides guidance to outline the main elements of the existing character, as well as the broad principles that all development in the countryside will have to follow. The guidance aims to help retain and enhance valuable landscape characteristics that are important to Babergh and Mid Suffolk, while also encouraging developments in appropriate locations with good design leading to sustainable economic benefits.

B.325 Dedham Vale AONB Management Plan 2021-26²⁶⁵: The plan sets out the management objectives for the area which have been agreed with the relevant Local Authorities and organisations involved with the project's partnership. It aims to conserve and enhance natural beauty with secondary purposes to meet the needs of recreation, safeguarding agriculture, forestry and other rural industries.

B.326 Suffolk Coast & Heaths AONB Management Plan 2018-2023²⁶⁶: The management plan has five objectives that focus on different topics such as landscape, coast and estuaries, land use and wildlife, enjoying the area and working together. It sets out a vision for the area and aims to conserve and enhance the area.

Current baseline

B.327 In Babergh District, there are two Areas of Outstanding Natural Beauty (AONB): Dedham Vale and Suffolk Coast & Heaths, both located in the south and south-east of the District, respectively, as shown in **Figure B.21**. In July 2020, the Secretary of State confirmed Natural England's legal Order to designate three extensions to the Suffolk Coast & Heaths AONB. The three new boundary extensions increase the size of the existing AONB by approximately 38km² (an increase of approximately 9.5%). The areas are now confirmed as forming part of the Suffolk Coast & Heath AONB are:

- The Stour Estuary including the estuary itself, the northern estuary slopes at Brantham and the majority of the southern estuary valley slopes in Essex.
- The Freston Brook Valley, a tributary of the Orwell Estuary which extends inland from the existing AONB boundary westwards and includes surrounding plateau woodlands.
- The Samford Valley, a tributary of the Stour Estuary, which extends further inland from the existing AONB boundary at Stutton Bridge and includes some areas of neighbouring Shotley Peninsula Plateau.

B.328 National Character Area (NCA) profiles created by Natural England are used to define the specific combination of landscape, geodiversity, biodiversity, history, culture and economic activity in an area. NCAs follow natural lines in the landscape instead of administrative boundaries²⁶⁷. The National Character Areas are shown in **Figure B.22**.

B.329 Babergh runs through the NCAs Suffolk Coast and Heaths (82) and South Suffolk and North Essex Clayland (86)²⁶⁸. Mid Suffolk runs through the NCAs South Norfolk and High Suffolk Claylands (83) and South Suffolk and North Essex Clayland (86).

B.330 Suffolk Coast and Heaths (82) is found in the south-east of Babergh District covering Shotley Gate, Pin Mill and Holbrook. This NCA is one of the driest parts of the country, with local rainfall typically only two thirds of the national average. The underlying geology shaped by the effects of the sea and interactions of people have created the distinctive landscape character. The majority of the NCA is flat or gently rolling and often open with a few viewpoints. Wildlife habitats and landscape features are found in close proximity in many places, especially near the coast, which provide great diversity in a small area. This NCA also contains part of Dedham Vale Area of Outstanding Natural Beauty (AONB).

B.331 South Norfolk and High Suffolk Claylands (83) is found in the north of Mid Suffolk District. The High Suffolk Claylands is a high predominately flat clay plateau which dominates the area of the NCA and is dissected by a small number of small-scale

²⁶⁴ BMSDC (2015). Landscape Guidance. (see <https://www.babergh.gov.uk/assets/DM-Planning-Uploads/Joint-Landscape-Guidance-Aug-2015.pdf>).

²⁶⁵ Dedham Vale Area of Outstanding Natural Beauty (AONB) and Stour Valley (2021). Dedham Vale Area of Outstanding Natural Beauty (AONB) and Stour Valley Project Area Management Plan 2021-26. (see <https://www.dedhamvalestourvalley.org/wp-content/uploads/2021/12/2021-Management-Plan-Final-Single-Page.pdf>).

²⁶⁶ Suffolk Coast & Heaths Area of Outstanding Natural Beauty (2018). Suffolk Coast & Heaths Area of Outstanding Natural Beauty Management Plan (2018-2023). (see <http://www.suffolkcoastandheaths.org/assets/About-Us/Man-Plan-Docs/2018-2023/2018-23-SCH-Management-Plan.pdf>).

²⁶⁷ HM Government (2014). National Character Areas. (see <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>).

²⁶⁸ HM Government (2014). National Character Area. (see <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles>).

wooded river valleys with complex slopes. The underlying geology is chalk and this the principal aquifer. Shallow marine deposits are overlain with glacial till, buried river gravels, lake sediments and finally bands of glacial outwash deposits.

B.332 South Suffolk and North Essex Clayland (86) is found in the north, north-west and south of Babergh District. The landscape is ancient with wooded arable countryside and a distinct sense of closure. The NCA is mainly gently undulating with chalky boulder clay plateau. The undulations are caused by numerous small-scale river valleys that cut through the plateau. Old species-rich hedgerows, ancient woodlands, parklands and meadows with streams and rivers flow eastwards. Despite field enlargements in the second half of the 20th century, there are still traditional irregular field patterns over much of the area. The moderately fertile soils are chalky clay and give the vegetation a more or less calcareous character. In addition, there are gravel and sand deposits under the clay which is an important geological feature that is often exposed during mineral extraction.

B.333 The NCA profiles indicate the drivers for change as well as the opportunities for environmental improvement. Typical drivers of change include development pressure, noise and light pollution, recreational pressure, changes in farming practices and intensive agriculture, mineral extraction, declines in biodiversity, loss or neglect of historic features, pressure on the water environment, and climate change.

B.334 The Value Landscape Assessment of the Stour Valley Additional Project Area (APA) (2020)²⁶⁹ associated with the Dedham Vale and the Suffolk Coast & Heaths AONBs, which lies beyond these designation boundaries, states that the Stour Valley Project Area shares similar characteristics to the Dedham Vale AONB. The special qualities of the AONB are set out in the AONB Management Plan as follows²⁷⁰:

- Iconic lowland river valley associated with the artist John Constable RA, the views he painted are still recognisable today.
- Historic villages with timber framed housing and prominent churches.
- Valley bottom grazing marshes with associated drainage ditches and wildlife.
- Naturally functioning River Stour with associated tributaries, meres and historic river management features.
- Semi natural ancient woodlands on valley sides and associated wildlife.
- Traditional field boundaries intact and well managed.
- Apparent and buried archaeology indicating millennia of human occupation.
- A sense of relative tranquillity;
- Surprisingly, long distance views from higher ground along the valley in an area associated with large skies.

B.335 In addition, the Report describes the APA as predominantly rural with medieval settlement patterns, and although the landscape has been altered by agricultural practices and the growth of settlements, it is fundamentally unchanged. Isolated farm buildings and hamlets are scattered throughout the landscape. The historic centres of many of the villages and towns within the assessment area have retained their special character with timber framed buildings, imposing churches and village greens²⁷¹.

B.336 The Value Landscape Assessment of the Suffolk Coast & Heaths APA (2020)²⁷² associated with the Dedham Vale and the Suffolk Coast & Heaths AONBs, states that the Shotley Peninsula area of the APA was specifically picked out as a key landscape attribute of National Character Area 82: Suffolk Coast and Heaths. The area's generally less impoverished soils were considered to be the best in Suffolk and they have had a significant impact on the landscape, evidenced by historic farms and settlements.

B.337 The Suffolk Coast & Heaths APA shares similar characteristics to the Suffolk Coasts & heaths AONB, the special qualities of which are set out in the publication on Natural Beauty and Special Quality Indicators²⁷³, and summarised below:

²⁶⁹ Suffolk Coast & Heaths Additional Project Area (2020). Valued Landscape Assessment: Stour Valley Project Area, Final Report.

²⁷⁰ Dedham Vale Area of Outstanding Natural Beauty (AONB) and Stour Valley (2016). Dedham Vale Area of Outstanding Natural Beauty (AONB) and Stour Valley Management Plan 2016-2021. (see <http://www.dedhamvalestourvalley.org/assets/About-Us/Man-Plan-consultation/AONB-Management-Plan-web.pdf>).

²⁷¹ Dedham Vale Area of Outstanding Natural Beauty (AONB) and Stour Valley (2016). Dedham Vale Area of Outstanding Natural Beauty (AONB) and Stour Valley Management Plan 2016-2021. (see <http://www.dedhamvalestourvalley.org/assets/About-Us/Man-Plan-consultation/AONB-Management-Plan-web.pdf>).

²⁷² Suffolk Coastal District Council (2020). Value Landscape Assessment: Suffolk Coast & Heaths Additional Project Area, Final Report.

²⁷³ LDA Design (Nov 2016). Suffolk Coast & Heaths Area of Outstanding Natural Beauty, Natural Beauty and Special Qualities Indicators. (see <https://www.eastsuffolk.gov.uk/assets/Planning/Adastral-Park/Environmental-Statement-Volume-2b-appendices/Appendix-H6-Suffolk-Coast-and-Heaths-AONB-Natural-Beauty-and-Special-Qualities-Indicators-November-2016.pdf>).

- Repetitive pattern of east west estuaries penetrating the coastal farmlands and heaths;
- Close knit interrelationship of semi-natural and cultural landscapes and built heritage features creating attractive compositions;
- Important areas of heath and acid grassland and coastal habitats highly valued for biodiversity;
- Enigmatic built structures and features including Sizewell and Orford Ness which sit within an open large-scale coastal setting;
- Sea cliffs and shingle beaches contrast with gently rolling sandland heaths and farmland;
- Long distant and panoramic views and large skies;
- Villages and small towns which high concentration of built heritage assets and local vernacular connected by network of hedged rural lanes;
- Designed parkland landscapes overlooking estuaries and high concentration of veteran trees;
- Associations with writers and poets;
- A sense of relative tranquillity.

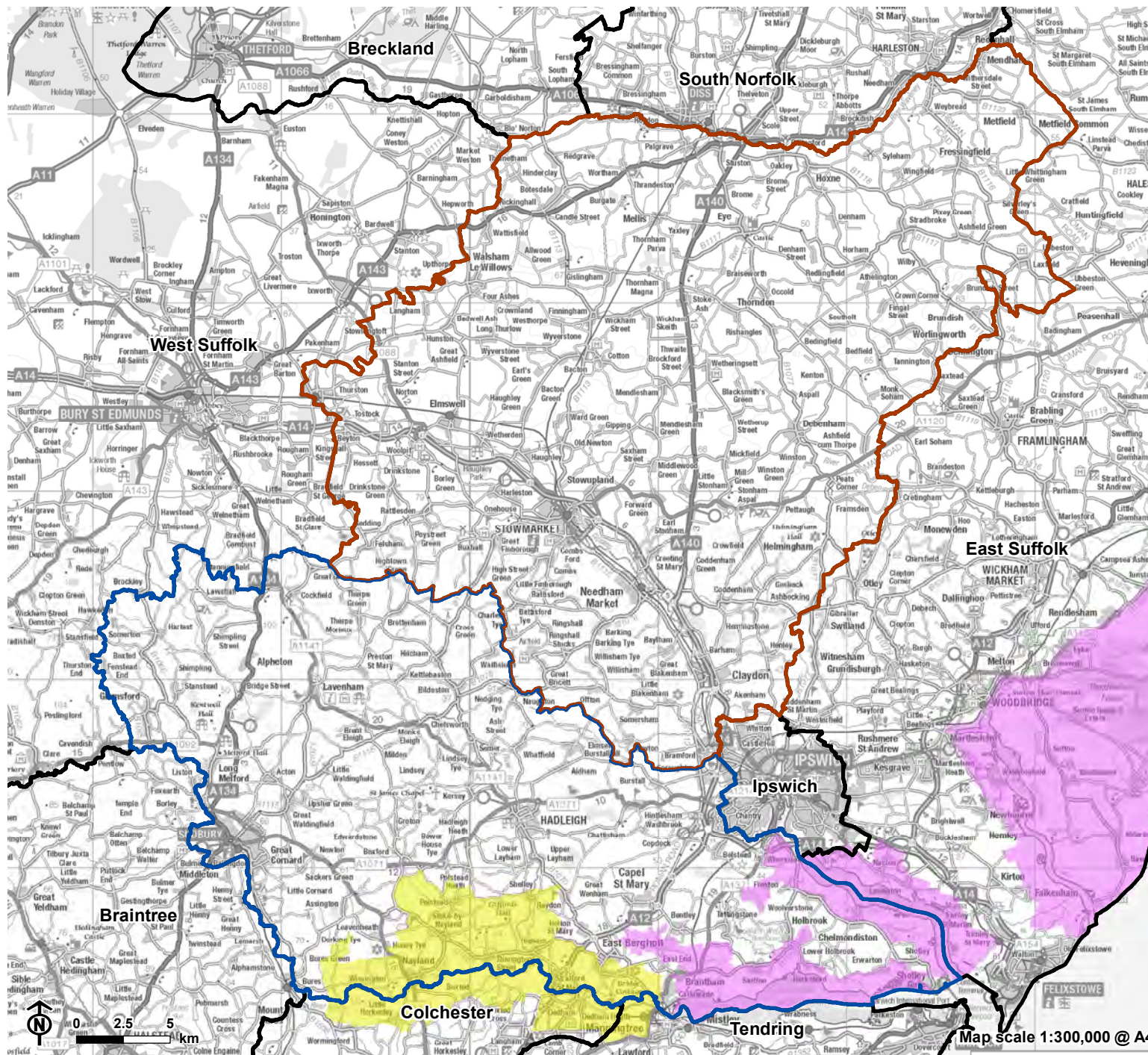


**Figure B.21: Nationally Designated
Landscapes**

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- Dedham Vale Area of Outstanding Natural Beauty
- Suffolk Coast & Heaths Area of Outstanding Natural Beauty

Figure B.22: National Character Areas

