

Babergh and Mid Suffolk District Councils
Regulation 18 Joint Local Plan Sustainability Appraisal –
Non-Technical Summary



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Place Services
Essex County Council





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Glossary of Acronyms

AA	Appropriate Assessment
ANA	Accommodation Needs Assessment
ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
B&MSDC	Babergh and Mid Suffolk District Councils
CA	Conservation Area
CO ₂	Carbon Dioxide
DCLG	Department for Communities and Local Government
DECC	Department of Energy and Climate Change
DEFRA	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
DPD	Development Plan Document
EA	Environment Agency
EC	European Commission
EEFM	East of England Forecasting Model
EU	European Union
GTAA	Gypsy & Traveller Accommodation Assessment
Ha	Hectare
HE	Historic England
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
I&O	Issues and Options
IWMP	Integrated Water Management Plan

JNCC	Joint Nature Conservation Committee
KS4	Key Stage 4
LB	Listed Building
LCA	Landscape Character Assessment
LEP	Local Enterprise Partnership
LPA	Local Planning Authority
LNP	Local Nature Partnership
MSA	Minerals Safeguarding Area
NE	Natural England
NEGC	North Essex Garden Communities
NHS	National Health Service
NPPF	National Planning Policy Framework
NVQ	National Vocational Qualification
OAN	Objectively Assessed Need
ONS	Office of National Statistics
PDL	Previously Developed Land
PO	Preferred Options
PPG	Planning Practice Guidance
PRoW	Public Right of Way
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHELAA	Strategic Housing and Employment Land Availability Assessment
SLAA	Strategic Land Availability Assessment



SHMA	Strategic Housing Market Assessment
SM	Scheduled Monument
SNPP	Sub National Population Projections
SO	Sustainability Objective
SPA	Special Protection Area
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance
Sqm	Square Metre
SSSI	Site of Specific Scientific Interest
STW/WRC	Sewage Treatment Works / Water Recycling Centres
SuDS	Sustainable Drainage System
TCPA	Town and Country Planning Association
UK	United Kingdom
UPC	Unattributed Population Change
WPA	Waste Planning Authority

Non-Technical Summary

1.1 Background

Babergh District Council and Mid Suffolk District Council commissioned Place Services to undertake an independent Sustainability Appraisal (SA) of the Regulation 18 Babergh & Mid Suffolk Joint Local Plan (2019).

1.2 The Local Plan

The Babergh and Mid Suffolk Local Plan (referred to hereafter as the Plan) responds to a national requirement that Local Planning Authorities (LPAs) must set planning policies in a local authority area. Local plans must be positively prepared, justified, effective and consistent with national policy in accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework 2019.

The Plan outlines the LPA's preferred options for consultation purposes. The Plan contains:

- Objectives and Strategic Policies (Part 1).
- Non-Strategic Delivery Policies (Part 2a)
- Non-Strategic Place and Allocation Policies (Part 2b)

Part 1 of the Plan sets out the strategic policies to address Babergh and Mid Suffolk's priorities for the development and use of land by establishing the overall strategy for the pattern, scale and quality of development (and any relevant cross boundary issues). The policies seek to make sufficient provision for:

- a) Housing (including affordable) employment, retail, leisure and other commercial development.
- b) Infrastructure; and
- c) Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaption.

Part 2 (a) of the Plan includes more detailed policies for management and delivery of types of development and Part 2 (b) sets out detailed policies for specific places and neighbourhoods. This includes new housing and land allocations, provision of infrastructure and community facilities (such as schools, healthcare and cultural facilities) at a local level, establishing design and construction principles, conserving and enhancing the natural and historic environment and setting out development management policies.

This SA assesses all relevant elements of the Plan that could give rise to any environmental, social or economic effects, including reasonable alternatives.

1.3 Evolution without implementation of the Plan

- The Scoping Report has outlined the key areas in which the Plan would have an effect. To ensure the data collected was relevant and captured the full range of sustainability issues, it was categorised under 12 thematic topics. They cover all the topics referred to in Annex 1(f) of the SEA Directive and follow the order of:
- Economy and employment
- Housing
- Population and society
- Health and wellbeing
- Transport and connectivity
- Cultural heritage
- Biodiversity and nature conservation
- Landscapes
- Water
- Climate and energy
- Air
- Waste, soils and Minerals

The baseline information of Babergh and Mid Suffolk has provided an overview of the current state of the environment. The outcome of the baseline information related to the identification of relevant plans and programmes of the Plan area is the identification of key sustainability issues, which help identify what evolution would be like without the Plan.

2. Sustainability Appraisal

2.1 The Requirement for Sustainability Appraisal

The requirement for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) emanates from a high level national and international commitment to sustainable development. The most commonly used definition of sustainable development is that drawn up by the World Trade Commission on Environment and Development in 1987 which states that sustainable development is:

‘Development that meets the needs of the present without compromising the ability of future generations to meet their own needs’

This definition is consistent with the themes of the NPPF, which draws upon The UK Sustainable Development Strategy Securing the Future’s five ‘guiding principles’ of sustainable development: living within the planet’s environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

SEA originates from the European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment” (the ‘SEA Directive’) which came into force in 2001. It seeks to increase the level of protection for the environment; integrate environmental considerations into the preparation and adoption of plans and programmes; and promote sustainable development. The Directive was transposed into English legislation in 2004 by the Environmental Assessment of Plans and Programmes Regulations (the ‘SEA Regulation’) which requires an SEA to be carried out for plans or programmes,

‘subject to preparation and/or adoption by an authority at national, regional or local level or which are prepared by an authority for adoption, through a legislative procedure by Parliament or Government, and required by legislative, regulatory or administrative provisions’.

This includes Local Plans. The aim of the SEA is to identify potentially significant environmental effects created as a result of the implementation of the plan or programme on issues such as:

‘biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors’ as specified in Annex 1(f) of the Directive.

SA examines the effects of proposed plans and programmes in a wider context, taking into account economic, social and environmental considerations in order to promote sustainable development. It is mandatory for Local Plans to undergo a Sustainability Appraisal in accordance with the Planning and Compulsory Purchase Act 2004 as amended by the Planning Act 2008, and in accordance with paragraph 165 of the NPPF.

Whilst the requirements to produce a SA and SEA are distinct, Government guidance considers that it is possible to satisfy the two requirements through a single approach providing that the requirements of the SEA Directive are met. This integrated appraisal process will hereafter be referred to as SA.

2.2 The Sustainability Appraisal Process

The methodology adopted for this SA of the Plan at this stage follows that of the Sustainability Appraisal process. This has been done alongside Local Plan Preparation, which included evidence gathering and engagement to form the basis of the Plan. The key stages of Sustainability Appraisal are:

- Stage A – Setting the context and objectives, establishing the baseline and deciding on the scope
- Stage B – Developing and refining alternatives and assessing effects.
- Stage C – Prepare the sustainability appraisal report
- Stage D – Seek representations on the sustainability appraisal report from the consultation bodies and the public
- Stage E – Post adoption reporting and monitoring

2.3 The Aim and Structure of this Non-Technical Summary

This Non-Technical Summary responds to Stage C in the SA process above; including those requirements of Stage B: assessing strategic options including reasonable alternatives, evaluating the likely effects of the strategic options and alternatives, and considering ways of mitigating adverse effects and maximising beneficial effects.

The production of a Sustainability Appraisal (Environmental) Report is a statutory requirement at this stage, and this SA Report has been produced to accompany the Plan consultation for Babergh and Mid Suffolk District Councils.

3. Sustainability Context and Objectives

3.1 Environmental Characteristics and Objectives

A total of 16 SEA Objectives have been derived for the appraisal of the Plan. They are based on the scope of the document, policy advice and guidance and to the assessment of the current state of the environment.

It is useful to test the compatibility of SEA Objectives against one another in order to highlight any areas where potential conflict or tensions may arise. It is also often difficult to separate out which environmental impacts will not have social and economic impacts. For this reason, it is beneficial that a high quality environment is part of a holistic approach to ensuring a sustainable future for social and economic growth, through a pragmatic appraisal. It is to be expected that some objectives are not compatible with other objectives thereby indicating that tensions could occur. Objectives which are based around environmental issues sometimes conflict with economic and social objectives, and vice versa.

Areas of potential incompatibility or uncertainty between the objectives relevant to the Plan are explained within the following bullet points:

- **Protecting landscapes and townscapes and the majority of the economic and social based objectives:** Notionally, there can be expected to be a challenge to avoid harm in regard to minimising Greenfield development with all other objectives relevant to growth needs within the Plan area.
- **Sustainable transport and the need to ensure access:** The promotion of the uptake of sustainable transport modes can be seen as potentially incompatible with the needs of ensuring appropriate linkages to the existing road network. Although truly sustainable outcomes can be seen to correspond to a modal shift to sustainable transport methods, notions of inclusivity determine that safe and efficient road access must also be ensured to reflect the baseline of car ownership and the reality that sustainable transport modes cannot be considered suitable for all demographics.
- **Health / open space and recreation based objectives with those associated with recreation and wildlife conservation / enhancement:** Although similar in form, it must be noted that the inclusion of recreational land should largely be provided in isolation from those areas that have been identified as contributing to green infrastructure. Similarly, land for purely landscape purposes should be managed in a way that offers either recreational or biodiversity value. The impacts of recreational activity on biodiversity and wildlife conservation can be significantly damaging to habitats.
- **Historic Environment conservation / enhancement with general development needs:** Historic Environment assets can come in many forms and in the built and natural environment. With this in mind, it is inevitable that there will be a degree of conflict between protection objectives and those that seek to ensure development needs are met.

3.2 Existing environmental issues relevant to the Plan

The table below summarises the existing environmental issues which are relevant to the Plan.

Table 1: Key Sustainability Issues

General theme	Description / Supporting Evidence
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General theme	Description / Supporting Evidence
Economy	The Babergh & Mid Suffolk DC Joint Town Centres & Retail Study highlights a decline in shopping centre consumer patterns.
	<p>There are barriers to growth within the Ipswich Economic Area which include:</p> <ul style="list-style-type: none"> • Shortage of suitable and affordable business premises, including start-up premise; • Poor internet and broadband infrastructure; • Attracting and retaining skilled workers to the area; • Inefficiencies related to traffic congestion; and • Lack of capital and financing to support growth ambitions.
	Babergh is not identifiable 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 Mid Suffolk and poor public transport.
	Suffolk has a low wage economy with median weekly gross earnings for full-time working (based on 2015 figures) being £460 for Babergh and £465 for Mid Suffolk, compared to the £532.40 national average
Housing	House prices in Ipswich, Babergh and Suffolk Coastal have increased at a faster rate than the national average.
	The recent Housing Delivery Test has indicated that Mid Suffolk has not met their housing targets over the past three years. In Babergh, housing targets were met in 2017/18, however the three year housing target was not met overall.
	There are approximately 10,687 properties in Suffolk that do not meet the Decent Home Standard under the Housing, Health and Safety rating because they are excessively cold
	There are high percentages of residents within Babergh and Mid Suffolk who live in rural areas, with 69% of Babergh's population and 75% of Mid Suffolk's population living in rural areas.
	Homelessness in Babergh had doubled within the period 2010-2014 and there are issues with the housing composition and affordability in Babergh and Mid Suffolk
	The majority of the homes across all tenures are large family units, with the owner occupied sector comprising of 72% of all homes
	The Suffolk Housing and Health Needs Assessment outlines that the number of people with a learning disability is forecast to increase by 9% by 2035, meaning that demand for housing which meets specialist needs is likely to increase.
Health and well-being	<p>The key issues for Suffolk, as highlighted in the Joint Strategic Needs Assessment are as follows:</p> <ul style="list-style-type: none"> • 1 in 6 children live in relative poverty; • Educational attainment is below national rates; • Suffolk has a low wage economy although employment rates are higher than average; • General affluence masks pockets of deprivation and inequality gaps; • The comparative risk of dying prematurely has increased if you are from deprived areas of Suffolk; and • Suffolk has an ageing population. • 14% of children are living in low income families (as of 2016), 10% of households are experiencing fuel poverty and 2 homeless and in priority need per 1,000 households (2017-2018).
	<p>The NHS Strategic Plan had forecast (based on figures 2008-2013) that the number of people in Suffolk:</p> <ul style="list-style-type: none"> • With long-term health conditions caused by stroke will increase by 23%; • With long-term conditions caused by heart attack will increase by 24%;

General theme	Description / Supporting Evidence
	<ul style="list-style-type: none"> • Suffering from dementia will increase by 17.5%; • With type 1 or type 2 diabetes will increase by 31.5%; • With depression will increase by 23%; • Visiting A&E after having a fall will increase by 20%; • With a limiting long-term illness will increase by 22%; and • Who are classed as obese will increase by 22.5%.
Transport and connectivity	<p>Both Babergh and Mid Suffolk benefit from some form of public transport provision, however due to the Districts being predominantly rural, a lot of these areas suffer from poor public transport links. Public consultations have identified a series of issues and priorities within Mid Suffolk as outlined below:</p> <ul style="list-style-type: none"> • Concerns about traffic generated from new developments; • Lack of investment in infrastructure; • Lack of pavements in several villages; • Public transport is limited in rural areas; • Speeding traffic; • The need for more cycle routes (especially in Stowmarket); • Traffic generation reaching highway capacity on A14 road; • Important links to nearby centres e.g. Ipswich, Bury, Diss, Harleston; and • Economic importance to the business community of maintaining and improving infrastructure. <p>Key transport issues for Babergh (as per the LTP):</p> <ul style="list-style-type: none"> • Sudbury bypass • Sudbury town centre traffic management and Cross Street Air Quality Management Area • Sudbury station • Residents parking, long stay parking, lorry parking • Hadleigh – local service, dial a ride • Hadleigh Benton Street • Lorry parking within the district • A12, A14 and Copdock improvement • Access to education (e.g. Suffolk One) • Linking new strategic development to town centres • Felixstowe to Nuneaton rail improvements to allow freight modal shift • Speed and management of A134 <p>Key transport issues for Mid Suffolk (as per the LTP):</p> <ul style="list-style-type: none"> • Stowmarket transport interchange • Tackling congestion in Stowmarket • Cycle network • Rural bus provision • Rural footpaths • Local access to key services • Lorry management
Historic	Both Districts have an exceedingly high quality of historic environment, containing; areas, settlements and buildings of

General theme	Description / Supporting Evidence
Environment	national significance. Meeting housing needs without causing harm to the historic environment will be a key challenge for the Plan.
	The Historic Environment is important to the character of both Districts, it is sensitive to change, and can be substantially affected by inappropriate development.
	The Heritage and Settlement Sensitivity Assessment for Babergh and Mid Suffolk District Councils assessed the settlements which have been identified as potential areas of residential expansion. The assessment identified eight settlements with cumulatively high value. These being: Boxford, Debenham, East Bergholt, Eye, Hoxne, Lavenham, Long Melford and Nayland.
	Generally, conserving and enhancing designated and non-designated heritage assets and the contribution made by their settings should be an important objective of the Plan. this includes 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, and also other factors such as traffic congestion, air quality, noise pollution and other problems affecting the historic environment
Biodiversity	There are two Areas of Outstanding Natural Beauty (AONB) alongside Sites of Special Scientific Interest (SSSI), Ramsar and Special Protection Areas (SPA) within the Plan area.
Landscape	Large parts of Suffolk are protected for their wildlife or landscape value. Approximately 4% of this land area is designated as an SSSI and has two Areas of Outstanding Natural Beauty; the Suffolk Coast and Heaths and the Dedham Vale, both combined covering an area of 44,000ha (12%) of the land area. Proximity of homes to green space can add capital value of houses in England, highlighting the economic importance of incorporating green spaces within developments.
	Babergh's Landscape Character consists of a rolling and undulating landscape which was caused by regular incisions by both the River Gipping and River Stour. The distinctiveness of the 'Gipping Divide' has recently been acknowledged for its role as a significant historic cultural boundary.
	Mid Suffolk's Landscape Character is typically gently rolling plateau of heavy clay soils. Both the Waveney and Gipping Valleys are locally distinctive with the District.
Water Quality	Due to Babergh and Mid Suffolk having numerous rivers run 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.
	Natural England is committed to investing in protected area measures. This focuses on "safeguarding and where necessary improving the condition of Natura 2000 sites using measures such as river restoration, lake restoration, diffuse pollution, management of freshwater invasive species and habitat restoration on wetland sites."
	The presence of several bodies of water creates a risk of flooding and surface water flooding for sites within Babergh and Mid Suffolk. Along the river valleys there are areas of functional flood plain which can be incorporated into Green Infrastructure developments.
Climate change and energy	In Suffolk, domestic carbon dioxide emissions make up the majority of the county's emission. Transport was shown to be the second largest producer of emissions, closely followed by industry and commerce.
	The nature of Suffolk being mainly rural explains the high levels of dependence on the private car, as many villages and neighbourhoods are served by infrequent public transport or are in areas where public transport and alternatives are not available.
	Babergh falls under the Anglian Water region and Mid Suffolk under the Essex and Suffolk Water region – both area

General theme	Description / Supporting Evidence
	<p>which are prone to drought. Due to water being imported from elsewhere in the country, there must be effective and reliable water systems in place to reduce any harm associated with droughts, ranging from small-scale water inefficiencies to large-scale ones.</p>
Air	<p>Despite both Districts being largely rural, pockets of diminishing air quality can be found.</p> <p>Generally, emissions from odours from sewage treatment plants, composting facilities or poultry and pig farms can also be detrimental to air quality, especially in rural areas like the majority of Babergh and Mid Suffolk.</p>
Waste Water Recycling	<p>There are capacity issues at Stowmarket Water Recycling Centre. Recent data suggests the Water Recycling Centre (WRC) is at 90% of its permitted capacity, so there is limited room to take on any additional growth and development. In addition, there are also capacity issues at Hadleigh WRC which is at 95% of its permitted capacity. However, there are plans for upgrades to this works in PR19, although funding for this has not been finalised yet. It is important to be aware of areas with sewerage infrastructure constraints to development, these constraints should be taken into account when planning for future growth - For example, ensuring growth is phased in line with water company upgrades/improvements to assets.</p>

4. The Approach to Assessing the Plan

The SA is required to assess the environmental, social and economic impacts of the Plan.

The assessment was undertaken by exploring the sustainability implications of the Plan in so far as it will meet the objectives highlighted in the Sustainability Appraisal Objectives found below. This sets out the criteria against which to appraise the Plan.

Table 2: Sustainability Appraisal Objectives

SA Objective	Environmental	Social	Economic
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	✓	✓	
13. To conserve and enhance the quality and local	✓	✓	✓

SA Objective	Environmental	Social	Economic
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 encourage efficient patterns of movement and the use of sustainable methods of travel in support of economic growth	✓	✓	✓

Where the content of the Plan has been appraised against the Sustainability Objectives, the basis for making judgements within this report is identified within the following key:

Possible Impact	Basis for judgement
+	Strong prospect of there being positive impacts
?	Possibility of either positive or negative impacts, or general uncertainty
0	No impact
N/A	The sustainability objective is not applicable to the scope or context of the appraised content
-	Strong prospect of there being negative impacts and mitigation would be possible.

4.1 Environmental Protection Objectives

Local Plans must have regard to existing policies, plans and programmes at national and regional levels and strengthen and support other local plans and strategies. It is therefore important to identify and review those policies, plans and programmes and Sustainability Objectives which are likely to influence the Plan at an early stage. The content of these plans and programmes can also assist in the identification of any conflicting content of plans and programmes in accumulation with the Plan. Local supporting documents are also important to consider as they will significantly shape policies and decisions in the area.

It is recognised that no list of plans or programmes can be definitive and as a result this report describes only the key documents which influence the Plan. Annex B accompanying this SA Report outlines the key documents and offers a comprehensive description of these documents together with their relevance to the Plan.

5. Effects arising from the Plan

5.1 Introduction

In order to fully assess the Plan, the Sustainability appraisal analyses each policy within the document. Each section appraises the identified reasonable alternatives to provide transparency and robustness to the assessments. The process of identifying said alternatives has also been included, with the source cited for each alternative.

5.2 Significant Effects on the Environment

Table 3: Summary of Effects from the Strategic Policies

Objective & Criteria	Strategic Policies									
	SP01	SP02	SP03	SP04	SP05	SP06	SP07	SP08	SP09	SP10
SO1	?	+	+	+	N/A	N/A	?	+	N/A	N/A
SO2	+	+	+	N/A	N/A	N/A	N/A	+	N/A	N/A
SO3	+	+	?	+	?	+	N/A	+	N/A	N/A
SO4	++	+	+	+	N/A	N/A	N/A	N/A	N/A	N/A
SO5	?	N/A	N/A	N/A	N/A	N/A	N/A	+	?	+
SO6	?	N/A	?	?	N/A	N/A	N/A	N/A	?	?
SO7	?	N/A	?	?	+	+	0	N/A	N/A	N/A
SO8	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	+
SO9	N/A	N/A	?	?	N/A	N/A	N/A	N/A	N/A	+

Objective & Criteria	Strategic Policies									
	SP01	SP02	SP03	SP04	SP05	SP06	SP07	SP08	SP09	SP10
SO10	0	N/A	N/A	0	N/A	N/A	N/A	+	N/A	+
SO11	?	N/A	N/A	?	N/A	N/A	?	+	+	0
SO12	N/A	N/A	N/A	N/A	N/A	?	?	N/A	N/A	N/A
SO13	N/A	N/A	?	0	N/A	N/A	?	N/A	?	N/A
SO14	+	N/A	N/A	?	+	?	+	+	?	N/A
SO15	N/A	N/A	+	?	+	+	+	+	N/A	N/A
SO16	?	N/A	+	+	?	+	N/A	?	N/A	N/A

Table 4: Cumulative Impacts of the Plan's Policies

Sustainability Objective	Commentary
SO1	<p>Development is broadly and proportionately focused within the Districts' most sustainable settlements with existing services and facilities.</p> <p>The Plan's infrastructure, transport and design policies can be expected to have significantly positive cumulative impacts on health, albeit indirectly, through incorporating walking and cycling networks in new development and also ensuring that recreational, sports provision and open space is included.</p> <p>The Plan's Housing policies will have significantly positive cumulative impacts on social inclusion in regard to ensuring that the delivery of housing for special needs and an ageing population is forthcoming through the Plan period.</p> <p>The Plan's policies ensure that public open space is protected in the first instance and provided to support new developments.</p> <p>The Plan's policies can be expected to have positive overall effects through those policies related to designated open space, the protection of AONBs and also tourism and leisure.</p> <p>The Plan's Housing Spatial Distribution, in accumulation with the methodology in the settlement hierarchy, can ensure that there are positive effects on ensuring access to cultural and community facilities.</p> <p>There will be positive effects from the Plan overall, however no cumulative effects as no other effects have been identified from any other Plan policies.</p> <p>There will be positive cumulative effects arising from the Plan's policies regarding minimising and eliminating noise and odour.</p> <p>There will be uncertain effects regarding ensuring shared community use and the co-location of services resulting from the Plan policies.</p> <p>The Plan's policies can be expected to have significant positive overall effects through those policies related to access to the open countryside, the protection of AONBs and also tourism and leisure.</p> <p>Although Policy LP28 – Designated Open Spaces could lead to developments providing play spaces, the Policy and supporting text does not formally require such spaces, as it promotes an approach which considers that flexible suitable open space can meet all local needs and aspirations. To this extent, there will be no uncertain cumulative effects from the Plan's policies.</p>
SO2	<p>The Plan's policies have not been assessed as having any direct effects on improving qualifications and skills of young people and adults. Indirectly, the accessibility of education facilities can have an effect on skills; however effects singularly or cumulatively cannot be identified with any certainty.</p> <p>Both strategic and local policies regarding infrastructure provision have been identified as having a significant positive effect on delivery of new educational establishments to support plan-level growth throughout the Plan period.</p>

Sustainability Objective	Commentary
SO3	<p>The Plan's policies can be seen to have a significant positive effect on ensuring rural and urban poverty is addressed.</p> <p>The Plan's Housing Spatial Distribution, in accumulation with the methodology in the settlement hierarchy, can ensure that there are positive effects on ensuring access to cultural and community facilities.</p> <p>The Plan Policies focus on safeguarding and improving existing businesses, allowing them to grow in response to market sector conditions and set policy parameters that ensure the deliverability of any forthcoming schemes.</p> <p>The Plan's Policies outline that new dwellings are to be designed to meet these needs using the Lifetime Homes Standard or other similar design standards as appropriate.</p>
SO4	<p>The Plan's strategic policies identify an intention for OAN to be met within the Plan period, and this level of growth is supported by a Housing Spatial Distribution that enables the benefits of growth to be realised within a wider range of settlements within strategic transport corridors.</p> <p>The Plan's strategic policies identify an intention for OAN to be met within the Plan period. This ensures positive effects on ensuring that homelessness can be reduced in some instances.</p> <p>The Plan's strategic policies identify an intention for OAN to be met within the Plan period. This ensures significant positive effects on ensuring that the housing needs of the whole community are met.</p> <p>The Plan's local housing policies will ensure cumulative positive effects in regard to reducing the number of unfit homes.</p> <p>The Plan's Housing policies will have significantly positive cumulative impacts on social inclusion in regard to ensuring that the delivery of housing for special needs and an ageing population is forthcoming through the Plan period.</p>
SO5	<p>Notionally, strategic Policy will have a small degree of positive effect on water related sustainability criteria through a managed approach to addressing resources and a plan-led approach to identifying required infrastructure.</p> <p>It is possible that the Policies, in promoting a variety of different land uses, could have a negative effect on water quality, dependent on specific locations. Cumulatively however, neutral effects can be expected due to the inclusion and stance of Policy LP17 and also Policy LP26 which is designed to avoid flood risk and as such, is compatible with the conservation and enhancement of water quality and resources.</p> <p>The Plan includes a specific thematic policy regarding sustainable design and construction. There will be positive effects from the Plan overall, however no cumulative effects as no other effects have been identified from any other Plan policies.</p>

Sustainability Objective	Commentary
SO6	<p>The settlement hierarchy in conjunction with the Plan's housing spatial distribution can be expected to ensure that effects on localised air quality is minimised by ensuring homes are located in close proximity to services and facilities.</p> <p>Policy LP16 seeks to prevent/reduce all forms of possible pollution stating that the Policy will seek to 'prevent, or where not practicable, reduce all forms of possible pollution including, but not limited to; air, land, ground and surface water, odour, noise, light and any other general amenity.'</p> <p>Policy LP30 aims to "maximise the uptake in sustainable and active transport" and sets out a hierarchy to reduce dependence on private vehicles. It also has a section (3h) on electric charging points. This policy therefore aims to reduce air, noise and odour concerns (including in AQMAs) associated with motor transport and ensures positive effects. No cumulative effects are raised, as no other impacts have been identified in the assessment of the Policies.</p> <p>The Plan includes a specific thematic policy regarding sustainable design and construction. There will be positive effects from the Plan overall, however no cumulative effects as no other effects have been identified from any other Plan policies.</p>
SO7	<p>It is inevitable that the Plan's housing needs and spatial distribution will ensure that greenfield land is developed, however with a focus on existing settlement expansion. Cumulatively, the Plan's policies seek to ensure that only minimal unplanned growth would be forthcoming in the countryside to meet small and identified needs, such as rural exception sites and those related to small clusters near settlement. Cumulative effects are therefore positive.</p> <p>Policy LP16 also has provisions to minimise the loss of the best and most versatile agricultural land and to prioritise development on previously developed land where appropriate. It will similarly minimise the loss of open countryside to development where this land has a designation, potential designation, or where it forms a buffer zone to protect designated sites. No other policies seek to address directing development away from such areas ensuring that there are no cumulative effects.</p> <p>The Plan's allocations are primarily located adjacent to the existing settlement boundaries. This ensures that land is utilised to provide access to available services and facilities, while also preventing the loss of open countryside and discouraging urban sprawl. There will be significantly positive cumulative effects on making the best use of land in the Districts.</p> <p>The Policies do not actively seek to direct development away from Minerals Safeguarding Zones, which are designated by Suffolk County Council as the Minerals Planning Authority as representing areas where potentially good quality minerals are located. There will be no cumulative effects.</p>
SO8	<p>Impacts are not considered significant from this Policy in isolation. No other Plan policies are assessed as having any significant effects in this regard and so cumulative impacts are not identifiable.</p> <p>The Plan includes a specific thematic policy regarding sustainable design and construction. There will be positive effects from the Plan overall, however no cumulative effects as no other effects have been identified from any other Plan policies.</p>

Sustainability Objective	Commentary
SO9	<p>Policy SP10 of the Plan's strategic policies seeks to encourage and support innovative and proactive approaches to design and opportunities to deliver decentralised energy systems powered by a renewable or low carbon source and associated infrastructure, including community-led initiatives. All of these policies together with those related to sustainable transport; ensure significant cumulative effects on ensuring that emissions can be reduced per head.</p> <p>No strategic proposals are identified in the Plan for renewable energy generation in the Plan area. There will be no cumulative effects as a result.</p> <p>Policy SP10 of the Plan's strategic policies seeks to encourage and support innovative and proactive approaches to design and opportunities to deliver decentralised energy systems powered by a renewable or low carbon source and associated infrastructure, including community-led initiatives. All of these policies ensure that homes can be highly energy efficient.</p>
SO10	<p>Policy SP10 seeks to minimise the risk of flooding through requiring a sequential risk-based approach taking into account future-proofing measures for impacts of climate change from major developments. Policy LP26 supports this stance at the local level and applicable to smaller schemes, ensuring significant positive effects on minimising flood risk including the incorporation of SuDS.</p> <p>The Plan's policies do not actively seek to minimise the risk of estuarine erosion at the Policy level.</p> <p>The Plan includes a specific thematic policy regarding sustainable design and construction. There will be positive effects from the Plan overall, however no cumulative effects as no other effects have been identified from any other Plan policies.</p> <p>The Plan does not specifically include any requirements for development to ensure that buildings and public open spaces are designed to respond to winter and summer temperatures. Uncertain effects are highlighted cumulatively in response to the Plan's level of growth.</p>
SO11	<p>The Plan's infrastructure policies, both strategic and local ensure that effects on Habitats Sites from recreational pressure can be mitigated.</p> <p>The Plan's policies generally seek to ensure neutral effects cumulatively in regard to protecting nature conservation designations. The Plan seeks to direct growth away from such areas; however the level of growth could lead to increased visitor pressure on their condition. Cumulatively, the effects of the Plan's policies are positive.</p>
SO12	<p>Policy LP20 requires that all designated and non-designated heritage assets must be preserved, enhanced or conserved in accordance with statutory tests and their significance. The level of growth directed to the Plan area's historic settlements, coupled with a strong focus on the tourism potential of such areas, leads to uncertain effects generally on the historic environment cumulatively.</p>

Sustainability Objective	Commentary
SO13	<p>The Policy, although supportive of tourism development in principle is suitably precautionary in regard to the scale, character and nature of the locality. Cumulatively, there will be positive effects on protecting and enhancing the AONBs.</p> <p>The Plan's Policies actively share a common theme in directing growth to the most appropriate land in the first instance for multiple types of development. There will be significantly positive cumulative effects on making the best use of land in the Districts.</p> <p>The Policies share a common theme in seeking to protect important landscapes and landscape features in their own right and also from the potential harm of development.</p>
SO14	<p>The Plan Policies focus on safeguarding and improving existing businesses, allowing them to grow in response to market sector conditions and set policy parameters that ensure the deliverability of any forthcoming schemes. Cumulative impacts on business development are therefore significantly positive.</p> <p>Cumulative impacts on business resilience are therefore significantly positive.</p> <p>The Plan's policies seek to promote employment development across a range of sectors, additionally acknowledging the role that tourism, energy and healthcare play in providing jobs within the Districts and a need for opportunities for indigenous business development in both urban and rural areas.</p> <p>The Plan's policies can be seen to have a significant positive effect on ensuring rural and urban poverty is addressed across a wide range of themes, including barriers to services, access to employment and ensuring a range of homes to meet the needs of various demographics.</p> <p>The Plan's economy policies will help to achieve sustainable levels of prosperity and economic growth throughout the Plan area, cumulatively with other policies in the JLP.</p> <p>Plan evidence suggests that, in quantitative terms, there is considered to be sufficient existing identified land to meet baseline objectively assessed need over the plan period.</p> <p>The Plan's Housing Spatial Distribution, in accumulation with the methodology in the settlement hierarchy, can ensure that there are positive effects on ensuring access to services and facilities including food stores and shops for social enterprises.</p> <p>The Plan policies do not make specific mention to including managed and affordable workspace for local business as part of new development proposals. There will be no cumulative effect resulting from the policies.</p>
SO15	<p>The Plan's policies can also be seen to have a minor cumulative effect on decreasing the number of vacant units in town centres. Effects are more indirect however, and are not significant due to the Plan's acknowledgement of the need for a mix of uses in town centres.</p> <p>The Plan's Policies can be expected to cumulatively increase the range of employment opportunities within towns by improving premises options and the quality of premises, including a support for their expansion.</p>

Sustainability Objective	Commentary
SO16	<p>Through safeguarding existing strategic employment land and also directing growth new employment development to align with the Housing Spatial Distribution, effects on minimising out-commuting are positive.</p> <p>The Plan's Housing Spatial Distribution, in accumulation with the methodology in the settlement hierarchy, can ensure that there are positive effects on ensuring access to jobs, services and facilities in walking / cycling distances.</p> <p>The Plan's policies do not address any need to increase the proportion of freight transported by rail or other sustainable modes. The potential for positive effects has been identified for Policy SP08 through ensuring that both highways improvements and sustainable modes are promoted and made viable through the necessary infrastructure improvements; however it is unknown at this stage whether this would increase the proportion of freight transported by rail or other sustainable modes.</p>

5.3 Selected Alternatives for Strategic Policies

Policy	Reason for Selection / Progression	Alternative	Reason for Rejection
SP01	The Policy will ensure significantly positive short-long term effects on meeting housing needs and ensuring delivery. This is further supported by commitments to a Plan review every 5 years.	No alternative strategic options are considered reasonable.	N/A
SP02	The Policy approach is progressed as it enables affordable housing delivery throughout both urban and rural areas. The policy is also flexible, in ensuring that viability be a consideration should any exception be required and affect deliverability.	ALT1: A lower than the on-site affordable housing need requirement to the SHMA level.	It is not considered appropriate to identify a specific alternative as this requirement is considered to support delivery of affordable housing as identified through the SHMA.
SP03	The Policy enables growth to be directed to where people live across a wide range of higher-lower order settlements. The settlement hierarchy review has been based on the quantitative	<p>ALT1: A review of settlements based upon recognising key facilities/ services only</p> <p>ALT2: A review of settlements based upon the population or size</p>	(ALT1) This alternative does not recognise the differing importance of different services and facilities to communities and in reducing the need to travel. The option of drafting a settlement hierarchy simply according to measurement of rural settlement size of

Policy	Reason for Selection / Progression	Alternative	Reason for Rejection
	level of services and facilities in broad areas of settlements, allowing growth to be distributed to the Districts' most sustainable areas.	of settlements. ALT3: An extended criteria range of services and facilities.	population or existing housing stock (ALT2), is considered too simplistic an approach and many rural settlements of a significant size could be misrepresented if they do not have good access to key services and facilities. An extended criteria range of services and facilities (ALT3) also represents a disproportionate approach, as this would be unlikely to distinguish any significantly greater sustainability characteristics.
SP04	The spatial distribution of housing set out in the Plan seeks to secure a balance to growth in the strategic transport corridor areas, as well as ensuring that other market towns and rural communities benefit from appropriate growth.	ALT1: A new settlement. ALT2: Focussed growth in Ipswich and Market Towns.	The alternative (ALT1) of a new settlement option is not considered deliverable to the objectives of this plan at the present time, due to long lead in times and builds out rates. By choosing the approach to focus growth in Ipswich and Market Towns (ALT2) the delivery potential would be limited to meet the diverse housing needs and would not stimulate rural economic vitality.
SP05	The Policy does not identify any net additional employment land, instead reflecting the evidence of the Lichfields Sector Needs Assessment (2017), which forecasts that existing supply is sufficient to meet baseline objectively assessed need over the plan period. The Policy focuses on safeguarding and improving existing businesses, allowing them to grow in response to market sector conditions.	No alternative strategic options are considered reasonable.	N/A
SP06	The Policy seeks to restrict out of centre retail development. The Plan states that retail and leisure development will be directed sequentially to the towns in Babergh and Mid Suffolk and to the core and hinterland villages as defined in the settlement hierarchy.	No alternative strategic options are considered reasonable.	N/A

Policy	Reason for Selection / Progression	Alternative	Reason for Rejection
SP07	The Policy recognises the strategic importance of the tourism sector within the Plan area, and as such a strategy is included.	No alternative strategic options are considered reasonable.	N/A
SP08	The Plan includes a strategic infrastructure policy to manage infrastructure provision in the locality. This supplements the NPPF, addressing issues of cumulative growth and education provision.	No alternative strategic options are considered reasonable.	N/A
SP09	The non-inclusion of this Policy would not mean that the RAMS is not applicable to the Plan area, and as a result there would be no difference in effects resulting from its inclusion or its omission.	No alternative strategic options are considered reasonable.	N/A
SP10	The Policy consolidated a strategic approach to addressing climate change.	No alternative strategic options are considered reasonable.	N/A

5.4 The Impacts of the Plan's Allocations

This section explores the secondary, cumulative and synergistic impacts of the Plan's Site Allocations.

5.3.1 Sustainability Objective 1. To improve the health and wellbeing of the population overall and reduce health inequalities

Infrastructure contributions and design policy can ensure that suitable alternative open space facilities are included within new developments individually and cumulatively. Open space will be a priority to incorporate into the design of residential development. Allocations within the Plan also seek to acquire relevant contributions to healthcare facilities in order to increase the likelihood of new facilities and also to alleviate comparative pressures on existing facilities. Overall, there can be expected to be positive impacts resulting from the Plan's allocations.

**Positive
Impacts**

5.3.2 Sustainability Objective 2. To maintain and improve levels of education and skills in the population overall

Negative cumulative impacts in relation to school capacities are apparent for a number of settlements as a result of the Plan's site allocations. In Sudbury, seven primary schools are over capacity, some by a considerable amount. Cumulatively primary school capacity issues are apparent within Sudbury. It should be noted however, that infrastructure contributions are likely to alleviate such pressures through school expansion where possible. A similar situation is predicted in Stowmarket, where the demand for places is likely to put pressure on existing schools. Issues related to education provision are not just limited to Urban Areas/Market Towns, Core Villages and Hinterland/Hamlet allocations will also exacerbate issues related to school capacity. This makes the issues of school capacity common and the cumulative impacts across Babergh and Mid Suffolk are predicted to be potentially negative - subject to mitigation being in place.

**Negative
Impacts**

5.3.3 Sustainability Objective 3. To reduce poverty and social exclusion and ensure access to jobs and services

The Districts are largely rural, with access to services a key sustainability issues for many existing residents. The Plan employs a site selection methodology that has ensured that allocations are not located within the least sustainable settlements. This ensures that growth is directed to those areas with existing services and facilities. This ensures positive impacts.

**Positive
impacts**

5.3.4 Sustainability Objective 4. To meet the housing requirements of the whole community

The Plan's allocations will have significant positive impacts on providing the District's housing needs. The allocation of sites for housing development or a range of sizes and suitably distributed throughout the Districts' settlement hierarchy, can be expected to ensure the delivery of a range of tenures and housing type.

**Positive
impacts**

5.3.5 Sustainability Objective 5. To conserve and enhance water quality and resources

Site allocations within the Plan may impact on water quality, with a number of sites located in close proximity to water bodies. Additionally many of the sites are located within a groundwater source protection zone, which could have negative impacts on water quality cumulatively, subject to further investigation and at the planning application stage. This is more likely to be an issue in Debenham, Elmswell and Eye.

**Uncertain
impacts /
possible
negative
impacts**

5.3.6 Sustainability Objective 6. To maintain and where possible improve air quality and reduce noise pollution.

In terms of air quality, there is only one AQMA in Babergh, located in Sudbury. There are no AQMAs in Mid Suffolk. Within the Plan there is four sites allocated for development

Neutral

within Sudbury, of these none are considered to exacerbate the AQMA as they are not within close proximity. Some allocations are found within close proximity to major roads, as a result there are potential air and noise pollution impacts regarding traffic. There are, however, sustainability benefits associated with focusing growth in proximity to existing strategic roads. Policy also exists within the Plan to eradicate and mitigate impacts, and mitigation can be seen as possible in all instances in line with site specific policies. As a protection based objective, there will be neutral plan wide impacts as a result.

impacts

5.3.7 Sustainability Objective 7. To conserve soil and mineral resources

A large number of site allocations in the Plan are located within areas of grade 2 agricultural land and so the development of these sites can be expected to have negative impacts on the availability of fertile land for agricultural purposes, which represents the highest quality in the District. Despite this, impacts are not widespread on a holistic plan level due to the preferred strategy. For this reason, overall neutral impacts are highlighted on a plan-wide level for this objective.

Neutral
impacts

5.3.8 Sustainability Objective 8. To promote the sustainable management of waste

The Plan's allocations are expected to have some impacts on the sustainable management of waste within the Plan's area. Allocations are expected to provide suitable area to promote the correct method of storage to encourage recycling.

Uncertain
impacts

5.3.9 Sustainability Objective 9. To reduce contributions to climate change

Any increase in growth is expected to increase emissions, however new developments are encouraged through the policies to incorporate sustainable design within sites. The Plan's allocations, which are located within sustainable existing settlements, are largely located in close proximity to strategic transport corridors and there are a few within 35m of a main A road, furthering the attraction of convenience to private car use. The Plan's policies encouraging innovative approaches to deliver energy systems powered by renewable or low carbon sources and associated infrastructure and supports community-led initiatives. The Plan ensures that new development is primarily well related to the existing settlement boundaries and public transport. However, there is potential negative impacts therefore the overall cumulative impacts are unknown.

Uncertain
impacts/
possible
negative
impacts

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

A number of sites have partial areas which are within flood zones, which has the potential to result in negative cumulative impacts on flooding within Babergh and Mid Suffolk. Despite

Positive
impacts

this, none of the allocated sites are entirely located within flood zones. The Plan outlines ways in which mitigation through design and the incorporation of features such as Sustainable Urban Drainage Systems, can reduce flood risk. The sites are in differing areas of flood risk, therefore any cumulative impacts are unlikely.

5.3.11 Sustainability Objective 11. To conserve and enhance biodiversity and geodiversity

There are multiple sites that are allocated within the Plan that would have an impact on environmentally designated sites if developed. These sites lie mostly in Hadleigh, Stowmarket, Chilton, Botesdale & Rickinghall, Brantham, Stradbroke and Holbrook. Additionally, there are several sites in Holbrook that would have an impact on a RIGS (Regionally Important Geological/ Geomorphological Site). However, the Plan's infrastructure policies (both strategic and local) ensure that effects on Habitats Sites from recreational pressure can be mitigated. The provision and retention of open space can alleviate pressures on Habitats Sites through redirecting recreational uses away from them. The presence of the Suffolk Coast RAMS results in cumulative positive effects alongside Policy LP28 in reducing pressures of recreational use on these sites. The specific effects on biodiversity are difficult to quantify at the strategic level. Some sites that are allocated within the Plan are in close proximity to designated sites for nature conservation however there is no direct loss in any instance. It is possible that negative impacts on their condition, through increased visitor numbers and footfall, could occur. Despite this, site specific policy exists that seek to ensure there are no effects on local designations or protected species on site. Cumulatively, the effects of the Plan's policies are positive.

**Positive
impacts**

5.3.12 Sustainability Objective 12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings

There are multiple sites that are in close proximity of an historical asset. Policy LP20 requires that all designated and non-designated heritage assets must be preserved, enhanced or conserved in accordance with statutory tests and their significance. The policy also seeks to reduce the amount of derelict, degraded and underused land and may also enhance the viability and vitality of the District's heritage centres through supporting the re-use/redevelopment of heritage assets. Despite this, the level of growth directed to the Plan area's historic settlements, coupled with a strong focus on the tourism potential of such areas, leads to uncertain effects generally on the historic environment cumulatively. The plan has been informed by a Heritage and Settlement Sensitivity Assessment, published in March 2018, which assesses these potential impacts in detail.

**Uncertain
impacts**

5.3.13 Sustainability Objective 13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes

Due to the largely rural nature of Babergh and Mid Suffolk, there is a limited number of

Unknown

brownfield sites available and many greenfield sites are allocated within the Plan. The Plan's policies can be expected to notionally have positive impacts in regard to landscape through protection and enhancement. However, there can be expected to have some degree of negative impact on landscapes overall. The Plan's policies will have cumulative positive impacts on townscape with the Plan's design policies ensuring significantly positive cumulative impacts on townscape and landscape. The Plan includes extensive policy regarding the protection of landscapes and additionally the Plan ensures a general restriction of development in the countryside and rural areas. A number of the Plan's site allocations are located in areas which have either a moderate to high or relatively high sensitivity to change. The cumulative impacts of this are hard to identify with any accuracy, pending the precise details of individual forthcoming proposals and adherence to Plan policy, however negative impacts cannot be ruled out at this stage.

impacts

5.3.14 Sustainability Objective 14. To achieve sustainable levels of prosperity and economic growth throughout the plan area

The Plan policies focus on safeguarding and improving existing businesses, allowing them to grow in response to market sector conditions and set policy parameters that ensure the deliverability of any forthcoming schemes.

Neutral Impacts

5.3.15 Sustainability Objective 15. To revitalise the Districts' town centres

The Plan's policies can be expected to cumulatively increase the range of employment opportunities within the towns by improving premises options and the quality of premises, including a support for their expansion. Policy SP06 – Retail and Leisure and also Local Policy LP13 – Retail and Town Centres seeks to direct retail and leisure use to town/district centres. These policies allow for a mix of uses within town centres which should ensure both an increased footfall and also benefits to both day and night economies (subject to restrictions). Overall the Plan's allocations can be seen to have significant positive effects through being located within or adjoining existing settlements.

Positive impacts

5.3.16 Sustainability Objective 16. To encourage efficient patterns of movement and the use of sustainable methods of travel in support of economic growth

Specific policies within the Plan address the provision of sustainable transport improvements. The Plan outlines specific policy that ensures sustainable transport improvements, which are further supported by infrastructure policies. Development is mostly focused within the District's settlement with existing transport links. Most of the Plan's allocations are well connected to the wider transport networks and focusing development to the most sustainable existing settlements in the first instance affords positive impacts. However, due to the large number of residential sites allocated there is likely to be an increase in private vehicle use in the predominately rural Districts, as public transport is likely to be less attractive in these areas. Therefore, cumulative significant positive effects are not predicted. The site allocations are broadly and proportionately focused within the District's most sustainable settlements with

Positive impacts

access to public transport.



5.5 The consideration of the Plan's 'Non-Strategic Place and Allocations Policies'

The plans site allocations all include a corresponding Policy within the Plan. Although the sites have been through a rigorous sieving exercise to ensure the most sustainable sites have been taken forward, it must be acknowledged that no site can be constraint free.

The new development locations (found in Table5) have been identified with consideration to consultation responses, the availability and deliverability of sites, the preferred spatial distribution pattern, the sensitivities and constraints of the area (eg. flood zones, heritage features and landscape designations etc) and the infrastructure capacity and opportunities (eg. schools and healthcare etc). Sites judged to perform best overall against the above criteria have been proposed. Any alternative sites (Table 6) have been discounted as less consistent with the criteria overall. No other sites or alternatives have been considered where the most relevant Strategic Housing and Economic Land Availability Assessment (SHELAA) has considered them unsuitable.

The SA appraised the policies from a 'policy-off' point of view, which identifies both positive and negative effects that the development would feel on site. Table 5 below shows the summaries of these:

Table 5: Assessment of Plans 'Non-Strategic Place and Allocations Policies'

Site Allocation	Recommendation
Policy LA001	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA002	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA003	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA005	It is recommended that the Policy expand upon the 'Health' & 'Transport' criterion in order to further address the effects of traffic congestion and air quality.
Policy LA006	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA007	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA008	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy
Policy LA009	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy
Policy LA010	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy
Policy LA011	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy
Policy LA012	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy

Policy LA013	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy
Policy LA014	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy
Policy LA016	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA020	The Policy considers many of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. It is, however; recommended that some mention of the nearby conservation area is included within the Policy.
Policy LA021	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA022	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA027	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA028	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA030	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA031	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA032	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA033	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA034	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA035	It is recommended that the Policy includes details regarding flood risk mitigation.
Policy LA036	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA037	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA038	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA039	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA040	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA041	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA042	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.

Policy LA045	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA046	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA047	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA048	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA049	It is recommended that the Policy includes details regarding flood risk mitigation. The policy should also give mention to the PROW on site.
Policy LA050	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA051	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA052	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA053	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA054	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA055	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA056	It is recommended that the Policy includes details regarding flood risk mitigation.
Policy LA057	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA058	It is recommended that the Policy includes details regarding flood risk mitigation.
Policy LA059	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA060	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA061	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA062	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA063	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA064	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA065	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA066	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.

Policy LA067	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA068	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA069	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA073	It is recommended that the Policy includes details regarding flood risk mitigation.
Policy LA074	It is recommended that the Policy provide suitable mitigation for the impacts on the townscape and landscape of the area. The site is also partialwithin flood risk zone 2, which would require mitigation.
Policy LA075	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA076	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA077	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA078	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA079	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA080	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA081	It is recommended that the Policy includes details regarding flood risk mitigation.
Policy LA082	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA083	It is recommended that the Policy includes details regarding flood risk mitigation.
Policy LA084	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA085	It is recommended that the Policy include details regarding the protection of the areas townscape/landscape
Policy LA086	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA087	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA088	It is recommended that the Policy provide suitable mitigation for the impacts on the townscape and landscape of the area.
Policy LA089	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA090	It is recommended that the Policy provide suitable mitigation for the impacts on the townscape and landscape of the area.
Policy LA091	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA092	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment

	of the site. No recommendations are therefore made for this Policy.
Policy LA093	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA094	It is recommended that the Policy include details regarding the protection of the areas townscape/landscape
Policy LA095	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA096	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA097	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA098	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.
Policy LA100	It is recommended that the Policy include details regarding the protection of the area's townscape/landscape due to its sensitivity.
Policy LA102	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made for this Policy.

Alternative sites

Table 6 found below contains the alternative site allocations for the Plan.

Table 6: Assessment of Plans 'Alternative Allocations'

Site Allocation	Site Location	Recommendation
ALT01	Land west of Branham Hill, Branham	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made.
ALT02	Land north of Church Road and east of Wyverstone Road, Bacton	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT03	Land north of Low Road, Debenham	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT04	Land north of Gracechurch Street, Debenham	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT05	Land to the west of Fishponds Way, Haughley	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT06	Land west of London Road, Copdock	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT07	Land east of Frog Hall Lane, Hadleigh	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made

ALT08	Land to the north east of Pond Hall Lane, Hadleigh	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT09	Land west of Aldham Mill Hill and east of Gallows Hill, Hadleigh	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT10	Land north of Red Hill Road/Malyon Road, Hadleigh	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT11	Land south-east of Benton Street, Hadleigh	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT12	Angel Court, Angel Street, Hadleigh	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT13	Land east of Loraine Way, Sproughton	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT14	Land south of Davidson Close, Sudbury	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT15	Land west of Ballingdon Hill and south of Sandy Lane, Sudbury	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT16	Land north of Newton Road, Sudbury	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT17	Land north of Sproughton Road, Sproughton	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT18	Land to the west of Hadleigh Road, Sproughton	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT19	Elm Road/Chilton Lodge Road, Sudbury	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT20	Land north of Barking Road, Needham Market	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT21	Land south west of Stowmarket Road, Needham Market	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT22	Land south of Gipping Road, Great Blakenham	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No

		recommendations are therefore made
ALT23	Land south of Ash Plough and west of Queen Street, Stradbroke	The Policy considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT24	Land east of Barking Road, Needham Market	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT25	Land to the east of Queen Street, Stradbroke	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT26	Land to the east of Queen Street, Stradbroke	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT27	Second Avenue (Garages), Sudbury	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT28	Land south of Church Road, Bacton	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT29	Land west of Old Ipswich Road, Claydon	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made
ALT30	Land to the north of Station Road, Haughley	The SA considers all of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. No recommendations are therefore made

6. Conclusions and Recommendations

6.1 Introduction

This section contains the overall impacts of the Plan's policy content and site allocations.

This draws upon the cumulative assessment of all previously mentioned aspects of the plan. It is considered to be a representation of the Plans sustainability as a whole. Impacts are identified against each of the SA's Sustainability Objectives.

6.1.1 Health and well-being

Policy Content	Site Allocations
Significantly positive impacts	Positive impacts
<ul style="list-style-type: none"> The Plan's strategic and infrastructure policies will have cumulative positive impacts on infrastructure delivery. Development is broadly and proportionately focused within the Districts' most sustainable settlements with existing services and facilities. The Plan's policies ensure that open and natural space is protected in the first instance and provided to support new developments. The Plan's infrastructure, transport and design policies however can be expected to have positive cumulative impacts on health, albeit indirectly, through incorporating walking and cycling networks in new development and also ensuring that recreational, sports provision and open space is included. 	

6.1.2 Education & skills

Policy Content	Site Allocations
Positive impacts	Uncertain / possible positive impacts
<ul style="list-style-type: none"> It is possible that negative cumulative impacts in relation to school capacities may occur for a number of settlements as a result of the Plan's site allocations and generally as a result of Plan-level growth. For the above reasons, impacts are identified as uncertain at this stage, with positive impacts identified should school expansion or new school provision be forthcoming as a result of the Plan. At the 'whole Plan level' uncertain to positive impacts should be identified to reflect differing impacts over the Plan period. The level of growth within the Plan, and the broad distribution of housing allocations ensure that school capacities will inevitably be affected. 	

6.1.3 Poverty and social exclusion

Policy Content	Site Allocations
Significantly positive impacts	Significantly positive impacts

- The Plan's strategic policies will have cumulative positive impacts regarding housing, employment, sustainable travel, accessibility, health and social inclusion, infrastructure delivery and education and skills.
- Although detailed effects are more appropriately identified at the local level, the Plan's Housing Spatial Distribution, site allocations and policies surrounding new growth can be considered wide reaching to a large amount of settlements within the settlement hierarchy, enabling poverty to be addressed.

6.1.4 Housing

Policy Content	Site Allocations
Significantly positive impacts	Significantly positive impacts

- The Plan's strategic policies identify an intention for OAN to be met within the Plan period, and this level of growth is supported by a Housing Spatial Distribution and site allocations that enable the benefits of growth to be realised within a wider range of settlements within strategic transport corridors. This reflects where people live.
- Additionally, the local housing policies ensure that the housing needs of a wide variety of demographics can be met, including a 35% affordable housing requirement on developments of a qualifying size in both urban and rural areas. This ensures significant positive effects on ensuring that the housing needs of the whole community are met.

6.1.5 Water quality and resources

Policy Content	Site Allocations
Uncertain impacts	Uncertain impacts

- Notionally, the Plan's Strategic Policies will have a small degree of positive effect on water related sustainability criteria through a managed approach to addressing resources and a plan-led approach to identifying required infrastructure. At the local level, Policy LP23 ensures that all residential developments are encouraged to achieve 100 litres per person per day. This is in addition to criteria 1.c in accordance with a recommendation from Anglia Water. Uncertainty cumulative effects exist however in regard to water resource capacity, which may need further investigation through phasing growth with water recycling infrastructure improvements. There are capacity issues at Stowmarket Water Recycling Centre.. Recent data suggests the Water Recycling Centre (WRC) is at 90% of its permitted capacity, so there is limited room to take on any additional growth and development. In addition, there are also capacity issues at Hadleigh WRC which is at 95% of its permitted capacity.
- Many of the Plan's site allocations are in Groundwater Source Protection Zones. Any development on these sites would need to ensure that they would not cause any negative water quality effects related to the potential pollution of ground water (e.g. give rise to hazardous substances such as pesticides, oils, petrol and diesel, solvents, arsenic, mercury or chromium VI; or non-hazardous substances such as ammonia or nitrates). Pollution control policies within the Plan exist to identify effects and these can be addressed at the planning application stage to ensure that no negative effects on water quality would be experienced.

- Additionally, multiple site allocations are in close proximity to water bodies, and thus identified effects are precautionary at this stage until assessments are undertaken if needed at any forthcoming planning application stage and subject to consultation with the Environment Agency.

6.1.6 Air quality and noise

Policy Content	Site Allocations
Positive impacts	Neutral impacts

- The settlement hierarchy in conjunction with the Plan's housing spatial distribution can be expected to ensure that effects on localised air quality is minimised by ensuring homes are located in close proximity to services and facilities. There will therefore be positive cumulative effects on air quality.
- The Plan's focus on distributing growth to the Plan area's strategic transport corridors may have a cumulative negative effect on localised air quality, should this lead to an increase in car usage however. In addition, a number of site allocations are in close proximity to A-roads, which may require air quality mitigation to be incorporated into schemes. The site allocations have however been assessed as having overall neutral impacts, in reflection of the site policies and the general local environmental development management policies of the Plan.

6.1.7 Soil and mineral resources

Policy Content	Site Allocations
Positive impacts	Neutral impacts

- The Plan's Policies actively share a common theme in directing growth to the most appropriate land in the first instance for multiple types of development. There will be significantly positive cumulative effects on making the best use of land in the Districts. There will be significantly positive cumulative effects on making the best use of land in the Districts.
-

6.1.8 Waste management

Policy Content	Site Allocations
Positive impacts	Uncertain to negative impacts

- The Plan's Policy SP10 will have a small degree of positive effect on reducing residential and commercial & industrial waste generated through encouraging and supporting new development that reduces waste and reduces/re-uses existing resources. Impacts are not considered significant from this Policy in isolation. No other Plan policies are assessed as having any significant effects in this regard and so significant impacts are not identifiable.
- The Plan's level of growth, reflected in part to the site allocations will ensure that more waste is generated per head than baseline 'pre-Plan' conditions. This is an inevitability, however uncertain to negative effects have been identified as a result. It should be noted however, that at the 'whole Plan level' overall effects can be expected to be neutral in line with Policy SP10 and behavioural change.

6.1.9 Climate change

Policy Content	Site Allocations
Significantly Positive impacts	Uncertain to negative impacts

- Any increase in growth can be expected to increase emissions, and the Plan area is faced with high levels of housing needs. There is therefore an inevitable level of negative effect resulting from all and any development. There will be no direct cumulative impacts on this objective resulting from any of the Plan's allocations, however overall negative impacts can be expected through the Plan's allocations, which although are located in order to minimise transport distances (and emissions) by focusing development in sustainable existing settlements, are largely located within strategic transport corridors which may lead to private car use being attractive. Without any firm evidence to suggest that new residents would not use private cars in such locations, impacts are identified as uncertain to negative overall.
- Despite this, Policy SP10 of the Plan's strategic policies seeks to encourage and support innovative and proactive approaches to design and opportunities to deliver decentralised energy systems powered by a renewable or low carbon source and associated infrastructure, including community-led initiatives. This is supported by local policies regarding Sustainable Construction and Design; Design and Residential Amenity; and Alternative Energy Sources, Storage and Distribution. All of these policies together with those related to sustainable transport; ensure significant cumulative effects on ensuring that emissions can be reduced per head. The Plan sets out solutions to deal with an increase in population in Babergh & Mid Suffolk, by further ensuring that development primarily is well related to existing settlements and public transport.

6.1.10 Flood risk

Policy Content	Site Allocations
Significantly positive impacts	Positive impacts

- Policy SP10 seeks to minimise the risk of flooding through requiring a sequential risk-based approach taking into account future-proofing measures for impacts of climate change from major developments. Policy LP26 supports this stance at the local level and applicable to smaller schemes, ensuring significant positive effects on minimising flood risk.
- Some site allocations are partially within flood risk zones 2 and 3, however not to the extent that a Strategic Flood Risk Assessment Part 2 would be required. Site specific policy exists within the Plan to ensure no allocated sites would be permitted that would experience any risk from flooding.
- At the 'whole Plan level' there will be significantly positive impacts associated with this objective. The Plan's policies suitably support and express national requirements surrounding minimising the risk of flooding and the Plan's allocations avoid Flood Risk Zones 2 and 3 in the first instance.

6.1.11 Biodiversity and geodiversity

Policy Content	Site Allocations
Positive impacts	Positive impacts

- The Plan's infrastructure policies, both strategic and local ensure that effects on Habitats Sites from recreational pressure can be mitigated.
- The Plan's policies generally seek to ensure neutral effects cumulatively in regard to protecting other nature conservation designations. Cumulatively, the effects of the Plan's policies are positive.
- The specific effects on biodiversity are difficult to quantify at the strategic level. Some sites that area allocated within the Plan are in close proximity to designated sites for nature conservation however there is no direct loss in any instance. Requirements for ecological assessments at the planning application stage will determine whether the site allocations are permissible.

6.1.12 The Historic environment

Policy Content	Site Allocations
Positive impacts	Uncertain impacts

- Policy LP20 requires that all designated and non-designated heritage assets must be preserved, enhanced or conserved in accordance with statutory tests and their significance. The level of growth directed to the Plan area's historic settlements, coupled with a strong focus on the tourism potential of such areas, impacts on these areas will be assessed on a case by case basis.
- As can be expected given the historic nature of the District's existing settlements and rural hinterlands, sites have been identified for allocation that could have negative impacts on heritage assets or their setting.

6.1.13 Landscapes and townscapes

Policy Content	Site Allocations
Positive impacts	Uncertain impacts

- The Plan's policies can be expected to notionally have positive impacts in regard to landscape through protection and enhancement. Despite protection being included within the Plan however, there is a diminishing amount of brownfield land and many Greenfield sites are allocated within the Plan. As such, there can be expected to have some degree of uncertain impacts on the landscape overall.
- The Plan's policies will have cumulative positive impacts on townscape with the Plan's design policies ensuring significantly positive cumulative impacts on townscape and landscape. The Plan includes extensive policy regarding the protection of landscapes and additionally the Plan ensures a general restriction of development in the countryside and rural areas.
- A number of the Plan's site allocations are located in areas which have either a moderate to high or relatively high sensitivity to change. The cumulative impacts of this are hard to identify with any accuracy, pending the precise details of individual forthcoming proposals and adherence to Plan policy, however negative impacts cannot be ruled out at this stage.
- The Plan as a whole will have generally uncertain impacts on landscape associated with the level of growth required and the sensitivity of landscapes within the Plan area. The site assessments within the SA were undertaken with a 'policy off' nature and without any consideration of specific proposals in order to be consistent and fair; they do not reflect the fact that many impacts can be minimised through effective design and layouts. The Plan can be seen to

strongly seek to avoid landscape impacts through necessary policy approaches.

6.1.14 Economic growth

Policy Content	Site Allocations
Significantly positive impacts	No impacts

- The Plan policies do not identify any net additional employment land for allocation, instead they reflect the evidence of the Lichfields Sector Needs Assessment (2018), which forecasts that existing supply is sufficient to meet baseline objectively assessed need over the plan period. The Plan Policies focus on safeguarding and improving existing businesses, allowing them to grow in response to market sector conditions and set policy parameters that ensure the deliverability of any forthcoming schemes. This sets the best possible environment to promote growth in key sectors through an approach of safeguarding strategic employment sites and EZs and supporting growth / expansion on strategic employment sites and in transport corridors. Cumulative impacts on business development are therefore significantly positive.

6.1.15 Town centre vitality and viability

Policy Content	Site Allocations
Significantly positive impacts	Significantly positive impacts

- Plan's Policies can be expected to cumulatively increase the range of employment opportunities within towns by improving premises options and the quality of premises, including a support for their expansion.
- The Plan's allocations can also be seen to have significant positive effects through being located within or adjoining existing settlements. This can be considered to boost the vitality and viability of town centres, through increasing footfalls.

6.1.16 Sustainable travel

Policy Content	Site Allocations
Positive impacts	Positive impacts

- The Plan's Housing Spatial Distribution, in accumulation with the methodology in the settlement hierarchy, can ensure that there are positive effects on ensuring access to jobs, services and facilities in walking / cycling distances. Specific policy also exists within the Plan that ensures sustainable transport improvements, which are further supported by infrastructure policies. The Plan's approach to site selection ensures that the broad sustainability of existing settlements has been a significant consideration in the selection of sites and the direction of growth, and no sites are allocated within the Plan area's least sustainable settlements. Despite this, cumulatively significant positive effects are not predicted as the Plan directs growth to the Plan area's strategic transport corridors, which may lead to private vehicle use being more attractive than public transport, walking and cycling.
- In line with the Plan's distribution of growth, the site allocations are broadly and proportionately focused within the District's most sustainable settlements with existing sustainable transport links.

6.2 Recommendations of the SA

The following recommendations have been made for specific plan policies:

- The assessment of Policy LP14 acknowledges that the Policy supports the tourism economy in the District and requires new tourism attractions and facilities to provide benefits to the residents of the Districts. The appraisal of the Policy identifies a recommendation that the Policy make reference to a need to identify and protect sites, features and areas of archaeological value, which could be of value to the leisure and tourism industry.
- In the assessment of Policy LP17, it was recommended that the Policy or supporting text could reference the ecosystem benefits provided by biodiversity and the potential for developments to use biodiversity to reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change e.g. through SuDS, green roofs, etc. Further, it was recommended that the Policy cover the potential for SuDS biodiversity gains to maximise potential benefits.
- Policy LP18 aims to protect the distinctiveness of landscapes across the Districts. Without a local policy, landscapes which may be important at the local level and which are undesignated could be harmed by development. Within the appraisal of the Policy, it was recommended that the Policy make the link between landscape and archaeological value, reflecting historical landscapes.
- Policy LP23 seeks to encourage the use of sustainable design and construction methods, which will reduce carbon emissions in the construction and operation of new development; reduce water consumption in the operational phase of the building; and encourage use of recycled materials which will conserve resources. The appraisal of the Policy includes the recommendation that the Policy or supporting text include details regarding extremes of winter and summer temperatures, which would include the need for shading.
- The appraisal of Policy LP29 identifies that the policy does not explore opportunities for shared community use and co-location of services and a discussion of the smart use of community facilities to provide more than one service would strengthen this policy. It is recommended that Policy LP29 includes an additional criterion which discusses shared community use and co-location of services.
- Policy LA005 - It is recommended that the Policy expand upon the 'Health' & 'Transport' criterion in order to further address the effects of traffic congestion and air quality.
- Policy LA016 - It is recommended that the Policy should provide further guidance due to the scale and location of the proposed residential site.
- Policy LA020 - The Policy considers many of the potential negative / uncertain effects highlighted within the 'Policy-off' assessment of the site. It is, however, recommended that some mention of the nearby conservation area is included within the Policy.
- Policy LA035 - It is recommended that the Policy includes details regarding flood risk mitigation.
- Policy LA049 - It is recommended that the Policy includes details regarding flood risk mitigation. The policy should also give mention to the PROW on site.
- Policy LA056 - It is recommended that the Policy includes details regarding flood risk mitigation.
- Policy LA058 - It is recommended that the Policy includes details regarding flood risk mitigation.
- Policy LA073 - It is recommended that the Policy includes details regarding flood risk mitigation.

- Policy LA074 - It is recommended that the Policy provide suitable mitigation for the impacts on the townscape and landscape of the area. The site is also partially within flood risk zone 2, which would require mitigation.
- Policy LA081 - It is recommended that the Policy includes details regarding flood risk mitigation.
- Policy LA083 - It is recommended that the Policy includes details regarding flood risk mitigation.
- Policy LA085 - It is recommended that the Policy include details regarding the protection of the areas townscape/landscape
- Policy LA088 - It is recommended that the Policy provide suitable mitigation for the impacts on the townscape and landscape of the area.
- Policy LA090 - It is recommended that the Policy provide suitable mitigation for the impacts on the townscape and landscape of the area.
- Policy LA094 - It is recommended that the Policy include details regarding the protection of the areas townscape/landscape
- Policy LA100 - It is recommended that the Policy include details regarding the protection of the area's townscape/landscape due to its sensitivity.

7. Next Steps & Monitoring

7.1 Consultation

In accordance with regulations (12)5 and 6 of the SEA regulations 2004, this SA Report will be subjected to a minimum 5 week consultation. There are three statutory consultees that are required to be consulted for all Sustainability Appraisal and Strategic Environmental Assessment documents. These are:

- The Environment Agency;
- Natural England; and
- Historic England.

In addition to these, consultation will seek to engage the wider community in order to encompass comprehensive, early and effective public engagement. Babergh and Mid Suffolk District Council may additionally wish to invite comments from focussed groups, relevant stakeholders and interested parties.

Please check the Plan website for more information, and direction to the relevant consultation portal.

7.2 Monitoring

The significant sustainability effects of implementing the Plan must be monitored in order to identify unforeseen adverse effects and to be able to undertake appropriate remedial action. The Framework contained in section 3.3.14 of Annex A of this Report includes suggested indicators in order to monitor each of the Sustainability Issue(s), however these may not all be collected due to limited resources and difficulty in data availability or collection.

Guidance stipulates that it is not necessary to monitor everything included within the Framework, but that monitoring should focus on significant sustainability effects, e.g. those that indicate a likely breach of international, national or local legislation, that may give rise to irreversible damage or where there is uncertainty and monitoring would enable preventative or mitigation measures to be taken.

Upon adoption, Local Plans will be accompanied by an Adoption Statement which will outline those monitoring indicators most appropriate for future monitoring of the Plan in line with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004.



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