

**Babergh and Mid Suffolk District
Councils**

Joint Local Plan Sustainability Appraisal Scoping Report

Final Report

Prepared by LUC

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Babergh and Mid Suffolk District Councils

Joint Local Plan Sustainability Appraisal Scoping Report

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Chapter 1

Introduction

Purpose of this SA Scoping Report

1.1 LUC was appointed in November 2019 to carry out the Sustainability Appraisal (SA) of the Babergh Mid Suffolk Joint Local Plan (JLP). A considerable amount of SA work on the JLP has already been undertaken (see **Chapter 2**), and LUC has been tasked with building on and developing this work for the remaining stages of the JLP preparation process.

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

1.3 The purpose of a SA Scoping Report is to provide the context for and determine the scope of the SA of the JLP and to set out the assessment framework for undertaking the later stages of the SA. Although two previous Scoping Reports have been published for consultation, this new Scoping Report is being issued for consultation in order to provide an updated economic, environmental and social policy context and baseline information, and to set out a refined method of approach to the SA, drawing on the SA work carried out to date. The refined method of approach is intended to strengthen the robustness of the SA, and thereby the soundness of the JLP.

1.4 The Scoping Report contains chapters on a number of sustainability topics, each of which starts by setting out the policy context of the JLP, before describing the current and likely future environmental, social and economic conditions in the plan area. This contextual information has been used to identify the key sustainability issues and opportunities that the Local Plan can address. The key sustainability issues and opportunities have been used to validate the existing framework of SA Objectives used to appraise the likely significant effects of the constituent parts of the Local Plan, including strategic policies, site allocations and development management policies. The key changes to the method of approach relate to refinements to the criteria and assumptions used for appraising potential site allocations to be considered for inclusion in the JLP, rather than the SA Objectives themselves. The refined SA also describes the further SA work to be undertaken.

1.5 The purpose of this consultation is to seek views on the proposed refined approach to the SA, in particular:

- Whether there are any additional plans, policies or programmes that are relevant to the SA that should be included.
- Whether the baseline information provided is robust and comprehensive and provides a suitable baseline for the SA of the Local Plan.
- Whether there are any additional key sustainability issues relevant to the plan area that should be included.
- Whether the amended SA framework (Chapter 11) is appropriate and includes a suitable set of SA Objectives.
- Whether the criteria and assumptions for appraising potential site allocations are appropriate for this stage of the SA process, and a suitable refinement on those used to date.
- Whether the overall spatial strategy options represent a suitable and reasonable set of alternatives, and that no other clearly distinguishable spatial strategy options should be added.

Babergh and Mid Suffolk Joint Local Plan

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

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

1.8 Babergh District Council and Mid Suffolk District Council have committed to preparing a Joint Local Plan.

Extant plans for Babergh District

1.9 The current Development Plan for Babergh consists of:

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

Extant plans for Mid Suffolk District

1.10 For Mid Suffolk, the Development Plan consists of:

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

1.11 The JLP will replace the Local Plans, Saved Policies, Core Strategies and the Stowmarket Area Action Plan, and cover the period 2018-2036.

1.12 The JLP will be set out in three parts:

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

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

Sustainability Appraisal and Strategic Environmental Assessment

1.14 Under the amended Planning and Compulsory Purchase Act 2004¹, SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive (European Directive 2001/42/EC) as transposed into law in England by the SEA Regulations², which remain in force despite the UK exiting the European Union in January 2020. Therefore, it is a legal requirement for

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

² *The Environmental Assessment of Plans and Programmes Regulations 2004* (SI 2004/1633), as amended by *The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018* (SI 2018/1232)

the JLP to be subject to SA and SEA throughout its preparation.

1.15 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the national Planning Practice Guidance³), whereby users can comply with the requirements of the SEA Regulations through a single integrated SA process – this is the process that is being undertaken in Babergh and Mid Suffolk District Councils. From here on, the term ‘SA’ should therefore be taken to mean ‘SA incorporating the requirements of the SEA Regulations’.

1.16 The SA process comprises a number of stages, with scoping being Stage A as shown below.

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

Stage B: Developing and refining options and assessing effects.

Stage C: Preparing the Sustainability Appraisal Report.

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

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

Habitats Regulations Assessments

1.17 The requirement to undertake Habitats Regulations Assessment (HRA) of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in July 2007 and updated in 2010 and again in 2012 and 2017⁴. The Regulations translate Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) and 79/409/EEC (Birds Directive) into UK law, and remain a legal requirement despite the UK exiting the European Union.

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

1.19 The HRA will be undertaken separately but the findings will be taken into account in the SA where relevant (for example to inform judgements about the likely effects of potential development locations on biodiversity).

Approach to Scoping

1.20 There are five tasks involved at the Scoping Stage:

Stage A1: Setting out the policy context for the SA of the Babergh and Mid Suffolk Joint Local Plan (i.e. key government policies and strategies that influence what the Local Plan and the SA needs to consider).

Stage A2: Setting out the baseline for the SA of the Babergh and Mid Suffolk Local Plan (i.e. the current and likely future environmental, social and economic conditions in Babergh and Mid Suffolk).

Stage A3: Drawing on A1 and A2, identify the particular sustainability problems and/or opportunities (‘issues’) that the Joint Local Plan and SA should address.

Stage A4: Drawing on A1, A2 and A3, develop a framework for SA Objectives and assessment criteria to appraise the constituent parts of the Joint Local Plan in isolation and in combination.

Stage A5: Consultation on the scope of the SA.

1.21 This Scoping Report fulfils the requirements set out above with a view to establishing the likely significant effects of constituent parts of the JLP in isolation and in combination. In accordance with national Planning Practice Guidance (PPG), published on-line by the Government, the Scoping Report should be proportionate and relevant to the Babergh and Mid Suffolk JLP, focussing on what is needed to identify and assess the likely significant effects.

Meeting the requirements of the SEA Regulations

1.22 Table 1.1 below signposts the relevant sections of the Scoping Report that are considered to meet the SEA Regulations requirements (the remainder will be met during subsequent stages of the SA of the Babergh and Mid Suffolk JLP). This table will be included in the full SA Report at each stage of the SA to show how the requirements of the SEA Regulations have been met through the SA process.

1.23 SEA Guidance recognises that data gaps will exist but suggests that where baseline information is unavailable or unsatisfactory, authorities should consider how it will affect their assessments and determine how to improve it for use in the assessment of future plans. Where there are data gaps in the baseline and forthcoming reports, these are highlighted in the text. The collection and analysis of baseline data is

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

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

regarded as a continual and evolving process, given that information can change or be updated on a regular basis. Relevant baseline information will be updated during the SA process as and when data are published.

- **Appendix B** presents the proposed refined criteria and assumptions for carrying out the SA of potential site allocations.

Structure of the Scoping Report

1.24 This chapter describes the background to the production of the Babergh and Mid Suffolk JLP and the requirement to undertake SA and other assessment processes. The remainder of this Scoping Report is structured around a set of SA subject areas designed to draw out the full range of possible sustainability effects generated by the Babergh and Mid Suffolk JLP, including all the SEA topics listed in Schedule 2 of the SEA Regulations.

1.25 Chapter 2 provides background on the Babergh and Mid Suffolk JLP and what consultation has been undertaken on it. It also describes the relationship of the Babergh and Mid Suffolk JLP with other plans and programmes. Each of the subsequent chapters set out the policy context and baseline for each SA subject area. The subject area chapters are as follows:

- **Chapter 3:** Population, Health and Wellbeing.
- **Chapter 4:** Economy.
- **Chapter 5:** Transport, Air Quality and Noise.
- **Chapter 6:** Land and Water Resources.
- **Chapter 7:** Climate Change Adaptation and Mitigation.
- **Chapter 8:** Biodiversity.
- **Chapter 9:** Historic Environment.
- **Chapter 10:** Landscape.

1.26 Chapters 3 to 10 highlight the key sustainability issues for the Babergh and Mid Suffolk JLP area under each subject area, and also set out their likely evolution without the new jointly prepared Local Plan.

1.27 Chapter 11 sets out the SA Framework and the proposed method of approach.

1.28 Chapter 12 sets out the scope of work to be appraised at the next stage of the SA process.

1.29 Chapter 13 summarises the consultation questions on the SA Scoping Report and sets out the next steps.

1.30 In addition, there are two appendices to the SA Scoping Report:

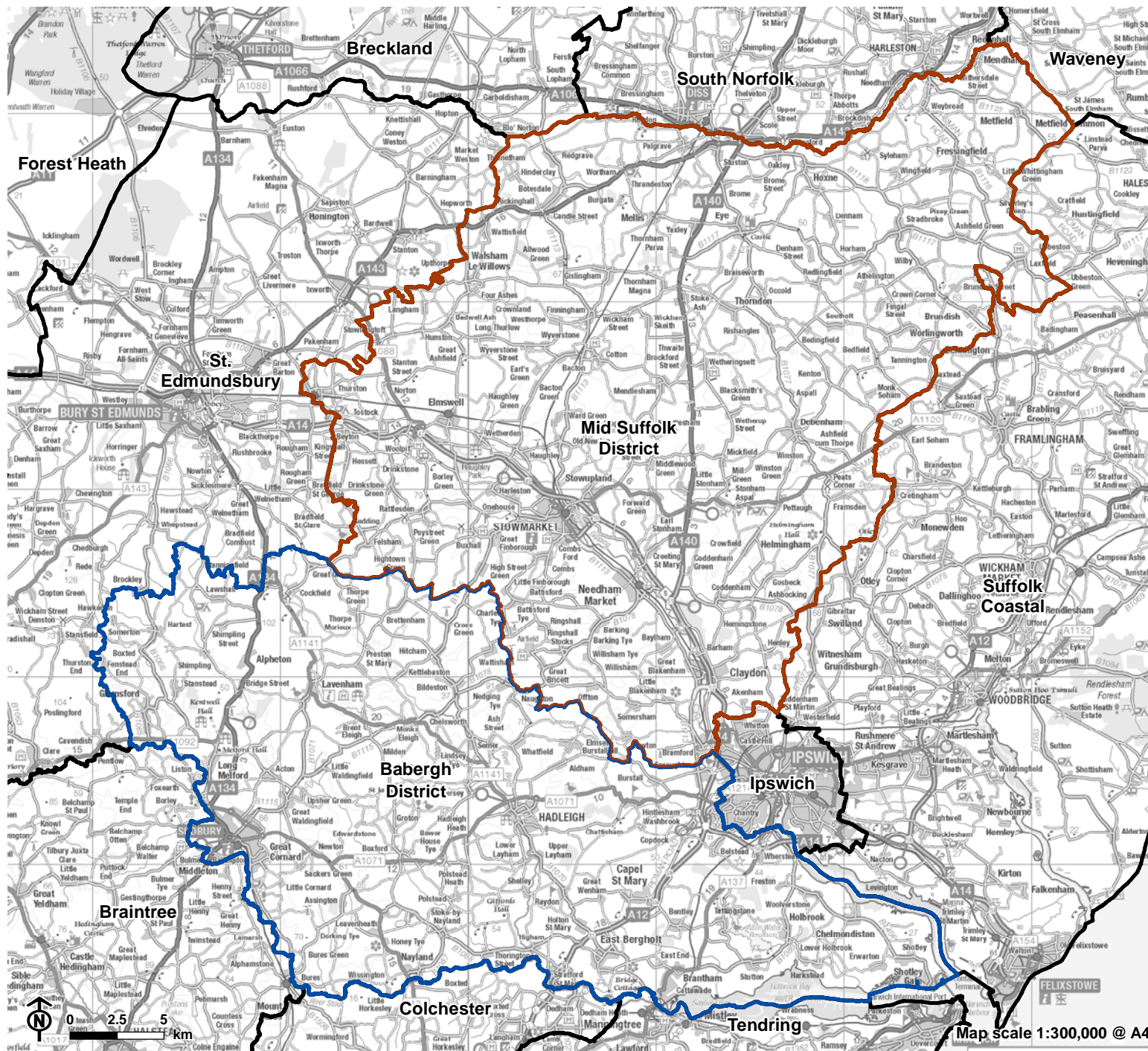
- **Appendix A** sets out the consultation comments on previous SA reports, and the response to these.

Table 1.1: Meeting the Requirements of the SEA Regulations

SEA Regulations' Requirements	Covered in this Scoping Report?
Environmental Report	
<p>Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation. The report shall identify, describe and evaluate the likely significant effects on the environment of:</p> <ul style="list-style-type: none"> ■ implementing the plan or programme; and ■ reasonable alternatives taking into account the objectives and geographical scope of the plan or programme. <p>(Regulation 12(1) and (2) and Schedule 2).</p>	The full SA Report produced to accompany BMSDC's Joint Local Plan will constitute the 'environmental report' as well and will be produced at a later stage in the SA process.
An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.	These requirements are addressed in this SA Scoping Report.
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	
The environmental characteristics of areas likely to be significantly affected.	
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC on the conservation of wild birds and the Habitats Directive.	
The environmental protection, objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	
<p>The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive effects, and secondary, cumulative and synergistic effects, on issues such as:</p> <ul style="list-style-type: none"> (a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape; and (m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l). 	Requirement will be met at a later stage in the SA process. This SA Scoping Report described the method by which significant effects will be identified.
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Requirement will be met at a later stage in the SA process.
An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including	Requirement will be met at a later stage in the SA process.

SEA Regulations' Requirements	Covered in this Scoping Report?
any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	
A description of the measures envisaged concerning monitoring in accordance with regulation 17.	Requirement will be met at a later stage in the SA process.
A non-technical summary of the information provided under paragraphs 1 to 9.	Requirement will be met at a later stage in the SA process.
<p>The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of:</p> <p>current knowledge and methods of assessment;</p> <p>the contents and level of detail in the plan or programme;</p> <p>the stage of the plan or programme in the decision-making process; and</p> <p>the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.</p> <p>(Regulation 12 (3))</p>	This SA Scoping Report and the Environmental Report will adhere to this requirement.
Consultation	
<p>When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible authority shall consult the consultation bodies.</p> <p>(Regulation 12(5))</p>	This SA Scoping Report will be published for consultation with the three statutory bodies (the Environment Agency, Historic England and Natural England), other stakeholders and the public.
<p>Every draft plan or programme for which an environmental report has been prepared in accordance with regulation 12 and its accompanying report ("the relevant documents") shall be made available for the purposes of consultation in accordance with the following provisions of this regulation.</p> <p>As soon as reasonably practical after the preparation of the relevant documents, the responsible authority shall:</p> <p>send a copy of those documents to each consultation body;</p> <p>take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority's opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental Assessment of Plans and Programmes Directive ("the public consultees");</p> <p>inform the public consultees of the address (which may include a website) at which a copy of the relevant documents may be viewed, and the period within which, opinions must be sent.</p> <p>The period referred to in paragraph (2) (d) must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents.</p> <p>(Regulation 13 (1), (2), and (3))</p>	Public consultation on the Joint Local Plan and accompanying SA Reports will take place as the Joint Local Plan develops.
<p>Where a responsible authority, other than the Secretary of State, is of the opinion that a plan or programme for which it is the responsible authority is likely to have significant effects on the environment of another Member State, it shall, as soon as reasonably practicable after forming that opinion:</p> <p>notify the Secretary of State of its opinion and of the reasons for it; and</p>	Unlikely to be relevant to the Joint Local Plan, as there will be no effects beyond the UK.

SEA Regulations' Requirements	Covered in this Scoping Report?
supply the Secretary of State with a copy of the plan or programme concerned, and of the accompanying environmental report. (Regulation 14 (1))	
Taking the environmental report and the results of the consultations into account in decision-making (relevant extracts of Regulation 16)	
As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall: make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge. (Regulation 16(1))	Requirement will be met at a later stage in the SA process.
As soon as reasonably practicable after the adoption of a plan or programme: the responsible authority shall inform (i) the consultation bodies; (ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and (iii) where the responsible authority is not the Secretary of State, the Secretary of State, that the plan or programme has been adopted, and a statement containing the following particulars: how environmental considerations have been integrated into the plan or programme; how the environmental report has been taken into account; how opinions expressed in response to: (i) the invitation in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account; how the results of any consultations entered into under regulation 14(4) have been taken into account; the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.	Requirement will be met at a later stage in the SA process.
Monitoring	
The responsible authority shall monitor the significant effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. (Regulation 17(1))	Requirement will be met after adoption of the new Joint Local Plan.



Chapter 2

Joint Local Plan Preparation Process

Background to the Joint Local Plan preparation process

LP consultations to date

2.1 Two rounds of Regulation 18⁵ consultations have been undertaken on the JLP by Babergh District Council and Mid Suffolk District Council (BMSDC) to date:

Consultation Document (August 2017)

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

Preferred Options Document (July 2019)

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

SA work undertaken to date

2.4 A number of stages in the SA process have been undertaken to date:

SA Scoping Report (2017)

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

Regulation 18 Consultation Document SA (August 2017)

2.6 BMSDC carried out an internal SA of the Regulation 18 JLP Consultation Document, which was subject to

⁵ The Town and Country Planning (Local Planning) (England) Regulations 2012 (SI 2012 No. 767).

consultation alongside the JLP Consultation Document by statutory consultees and Suffolk County Council.

Updated SA Scoping Report (April 2019)

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

Regulation 18 Preferred Options SA (July 2019)

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

SA Addendum (July 2019)

2.9 An SA Addendum was produced by Place Services as a result of some errors and site omissions in the Reg. 18 Preferred Options SA⁶.

2.10 Consultation responses on the SA work undertaken to date are set out in **Appendix A** of this SA Scoping Report.

LUC's appointment

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

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

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

Relationship of the JLP with other plans and programmes

2.14 It is a requirement of the SEA Regulations to describe the relationship of the plan to be subject to SA/SEA with other relevant plans and programmes.

2.15 This section therefore described, firstly, other plans that will form part of the development plan for Babergh and Mid Suffolk, and, secondly, the current status of other plans and programmes that may combine with the JLP to give rise to cumulative effects, such as Local Plans of neighbouring authorities and nationally significant infrastructure projects.

Neighbourhood Development Plans

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

2.17 There are 12 'made' (adopted) Neighbourhood Development Plans (NDPs) within BMSDC. These are as follows:

- **Aldham Neighbourhood Plan 2018-2036 (2020):** Provision has been made for around 15 dwellings and Pump Green, The Street, has been designated as a Local Green Space. The Neighbourhood Plan also contains a policy on recreational disturbance mitigation, to avoid adverse in-combination recreational disturbance effects on European sites.
- **East Bergholt Neighbourhood Plan 2015-2030 (2016):** A minimum of 86 new homes will be developed in East Bergholt, within or immediately adjacent to the village Built Up Area Boundaries. The Plan seeks to establish a Community Land Trust as a means of delivering homes, including affordable homes, with up to one third of new homes being designed to meet the needs of older people. Fourteen Local Green Spaces have also been designated.
- **Elmsett Neighbourhood Plan 2017-2036 (2019):** This Neighbourhood Plan provides for around 60 dwellings, all of which should achieve appropriate internal space standards. Seven Local Green Spaces have been designated and five community facilities/services have been protected. The Plan also protects important identified views that must not be adversely affected by development. Additional detail is provided on the design of development within the area in Policy EMST12.
- **Lavenham Neighbourhood Plan (2016):** This Neighbourhood Plan states that residential development

⁶ The SA Addendum was not considered at Babergh and Mid Suffolk Full Council meetings on 25 and 27 June 2019.

proposals will be permitted subject to them being located within or adjacent to the built-up area of Lavenham, and that development must respect views in and out of the village. A change of use to the existing school site to meet local retirement and care home needs will be supported, and a number of open spaces and recreation areas have been safeguarded. The Retail Core Area will also be protected and enhanced.

- **Lawshall Neighbourhood Plan 2016-2036 (2017):** Within the Built Up Area Boundaries there is a general presumption in favour of residential development in the form of single dwellings and small groups of up to five dwellings. Proposals outside of the Built Up Area Boundaries will be permitted where they adjoin the Boundary, or one dwelling (or a pair of semi-detached dwellings) where they adjoin the existing highway. Town recreation and green spaces are safeguarded from development unless very special circumstances can be demonstrated. The Plan contains a couple of policies which seek to protect and enhance biodiversity assets within the area.
- **Botesdale & Rickinghall Neighbourhood Plan 2017-2036 (2020):** The Neighbourhood Plan provides for a minimum of 200 dwellings to be developed up to 2036. It also safeguards 27 Local Green Spaces from development unless very special circumstances can be demonstrated. The Neighbourhood Plan contains details on the design of development.
- **Debenham Neighbourhood Plan 2016-2036 (2019):** This Neighbourhood Plan estimates that around 316 new dwellings can be developed in Debenham at the following sites (and an anticipated windfall allowance of 54 dwellings):
 - Land north of Ipswich Road (60-140 dwellings)
 - Land south of Low Road (15-35 dwellings)
 - Land east of Aspoll Road (37-87 dwellings)
 Additionally, 14 Local Green Spaces have been safeguarded from development unless it can be demonstrated that very special circumstances exist.
- **Haughley Parish Neighbourhood Plan 2016-2036 (2019):** Three sites have been identified for residential development, specifically:
 - Land east of King George V Playing Field (98 new homes)
 - Land at Station Road, east of Millfields (18-31 new homes)
 - Land west of Fishponds Way (25-50 new homes)

Commercial and industrial developments will also be supported within the Neighbourhood Plan area, where they are situated on brownfield sites. Details are also provided on the design of new development, in addition to the conservation and enhancement of biodiversity.

- **Mendlesham Neighbourhood Plan 2016-2031 (2016):** A minimum of 75 new homes will be provided up to 2031. Any significant increase on this figure will need to demonstrate clearly that existing local services infrastructure will be able to cope or, if not, that appropriate measures will be provided as part of development proposals. The Neighbourhood Plan requires development to include a suitable contribution of, or contribution towards, functional green areas for recreational purposes.
- **Stadbroke Neighbourhood Plan 2016-2036 (2019):** This Neighbourhood Plan provides for a minimum of 219 dwellings to be built in the period 2016 to 2036 and the following sites are allocated for development:
 - Land north of Laxfield Road (32-45 dwellings)
 - Land east of Farriers Close (25-35 dwellings)
 - Land south of New Street (43-60 dwellings)
 - Land south of Mill Lane (approximately 75 dwellings)
 - Land at Grove Farm (44 dwellings)

The Neighbourhood Plan also sets out detailed design principles and encourages the use of Sustainable Drainage Systems (SuDS). The expansion of education and health capacity within the village is also promoted.

- **Stowupland Neighbourhood Development Plan 2016-2036 (2019):** This Neighbourhood Plan provides for at least 203 new homes by 2036. Within the settlement boundaries for Stowupland and Saxham Street, there is a general presumption in favour of residential development in the form of infill and redevelopment sites, and small groups of approximately 10 dwellings. Proposals for development on sites of one hectare or more on the best and most versatile agricultural land will not be supported, unless it cannot be demonstrated that land of a poorer quality is not available. Green and blue infrastructure will be protected and strengthened.
- **Thurston Neighbourhood Development Plan 2018-2036 (2019):** New development in Thurston Parish shall be focused within the settlement boundary of Thurston Village. All housing proposals of five or more units must reflect Thurston's needs across all tenures, including the needs of older people. A number of Local Green Spaces have been safeguarded and provision has been made for wildlife in new developments.

2.18 There are 40 Neighbourhood Development Plans in progress within BMSDC:

- Hitcham NDP (area designated January 2020)
- Assington NDP (area designated June 2018)
- Bentley NDP (area designated July 2018)
- Boxford NDP (area designated August 2018)
- Capel St Mary (area designated April 2018)
- Chelmondiston (area designated March 2018)
- Chilton (area designated December 2017)
- Copdock & Washbrook (area designated September 2018)
- East Bergholt (Proposed Modification)
- Glemsford (area designated October 2017)
- Great Walsingham (area designated July 2017)
- Hadleigh (area designated June 2015)
- Hartest (second Pre-Submission consultation Spring 2018)
- Holbrook (area designated April 2018)
- Leavenheath (area designated May 2019)
- Little Cornard (area designated August 2018)
- Little Walsingham (area designated March 2017)
- Long Melford (Reg. 15 Pre-Submission consultation January-February 2019)
- Newton (area designated March 2018)
- Stoke by Nayland (area designated December 2017)
- Stutton (area designated October 2018)
- Whatfield (area designated July 2018)
- Woolverstone (area designated October 2018)
- Fressingfield (Referendum to be held on 12th March 2020)
- Eye (area designated October 2017)
- Drinkstone (Reg. 16 consultation Submission consultation December 2019-February 2020)
- Woolpit (Reg. 16 Submission consultation December 2019-February 2020)
- Wilby (Reg. 14 Pre-Submission consultation January-March 2020)
- Needham Market (Reg. 14 Pre-Submission January-March 2020)

- Ashbocking (area designated November 2019)
- Battisford (area designated December 2018)
- Beyton (area designated March 2019)
- Diss & District (area designated August 2017)
- Elmswell (area designated January 2014)
- Hoxne (area designated August 2019)
- Laxfield (area designated February 2018)
- Mendlesham (Proposed Modification)
- Redgrave (area designated December 2018)
- Thorndon (area designated October 2017)
- Walsham le Willows (area designated July 2018)

Suffolk County Council

Minerals and Waste Local Plan

2.19 Suffolk County Council published its submission Suffolk Minerals & Waste Local Plan (SMWLP) in June 2018. This is currently at public examination, with proposed modifications, which have been identified as being required to make the SMWLP legally sound.

2.20 The SMWLP allocates ten nine sites for the extraction of sand and gravel sufficient to supply 9.300 Mt over the Plan period to the end of 2036. Policy also states that the County Council will seek to maintain a landbank of permitted reserves of at least 7 years based upon the average of the last ten years' sales.

2.21 Although there are significant quantities of Local Authority Collected Waste, Commercial & Industrial Waste, Construction, Demolition & Excavation Waste, and Hazardous Waste managed within Suffolk, the Suffolk Waste Study concluded that there is no immediate shortfall in waste management capacity for these waste streams. Therefore, the SMWLP states that applications for new facilities would be considered in the normal way.

Local Transport Plan

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

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

2.23 Within the plan period, the County Council hopes to see the delivery of a number of strategic transport improvements including:

- Dualling of the A11 between Barton Mills and Thetford

- The Ipswich major scheme, 'Ipswich- Transport fit for the 21st Century'
- The Beccles rail loop allowing increased frequency of trains between Ipswich and Lowestoft
- The Beccles southern relief road
- The Lowestoft northern spine road to help remove through traffic from the town
- Ipswich rail chord to improve freight connections from Felixstowe
- Copdock A14/A12 junction improvements

Neighbouring authorities' local plans

2.24 Development in BMSDC area will not be delivered in isolation from those areas around them. The effect of new development and supporting infrastructure on neighbouring authority areas must therefore be considered as part of the SA. The BMSDC area is bordered by the following local authority areas, for which the below mentioned Local Plan documents are adopted or in preparation.

The North Essex Authorities

2.25 Tendring District Council, Colchester Borough Council and Braintree District Council have been working together on the strategic cross boundary issues present in North Essex. As a result, all three Local Plans share an identical Section 1, which includes policies on housing numbers and infrastructure, in addition to proposals for three new Garden Communities.

2.26 Section 1 of each Local Plan was considered through a joint Examination in Public between 16th January and 9th May 2018. Following the hearings, the Inspector concluded that Section 1 was not sound in its current form. Additional work was subsequently undertaken, with the Public Examination resuming between 14th and 30th January 2020. The North Essex Authorities are currently awaiting a response from the Inspector.

2.27 As set out in Section 1, existing settlements will be the principal focus for additional growth across North Essex within the period 2013-2033. Development will be accommodated within or adjacent to settlements according to their scale, sustainability and existing role both within each individual district and, where relevant, across the wider strategic area. The identified total minimum housing supply for each council area over the period 2013-2033 is as follows:

- **Tendring:** 11,000 (550 per annum)
- **Colchester:** 18,400 (920 per annum)
- **Braintree:** 14,320 (716 per annum)

2.28 A proportion of this housing will be delivered through three new Garden Communities:

- **Tendring/Colchester border:** a new garden community will deliver 2,500 new homes within the plan period (as part of an overall total of between 7,000 and 9,000 homes to be delivered beyond 2033).
- **Colchester/Braintree border:** a new garden community will deliver 2,500 new homes within the plan period (as part of an overall total of between 15,000 and 24,000 homes to be delivered beyond 2033).
- **West of Braintree in Braintree District Council area:** a new garden community will deliver 2,500 homes within the plan period (as part of an overall total of between 7,000 and 10,000 homes to be delivered beyond 2033).

2.29 A strong sustainable and diverse economy will be promoted across North Essex, with each Council pursuing a flexible approach to economic sectors showing growth potential across the plan period. Employment forecasts for each local authority area have been developed for the period 2013-2037 and are as follows:

- **Tendring:** 490 jobs per annum
- **Colchester:** 928 jobs per annum
- **Braintree:** 490 jobs per annum

2.30 In terms of specific B use land provision, each local authority has undertaken work to establish what quantum of employment land would be required within the plan period to meet demand. The employment land requirement for the period 2016-2033 based on baseline growth is as follows:

- **Tendring:** 20ha
- **Colchester:** 22ha
- **Braintree:** 23ha

Tendring District Council

2.31 As mentioned previously, Section 1 of Tendring District Council's Local Plan has been considered through a joint Examination in Public, alongside Colchester Borough Council and Braintree District Council. The North Essex Authorities are now awaiting a response from the Inspector.

2.32 Section 2 of Tendring District Council's Local Plan has been prepared by Tendring District Council and unlike Section 1, contains policies and site allocations relating solely to the District. Section 2 was submitted alongside Section 1 of the Publication Draft Local Plan in October 2017. According to Tendring's Local Development Scheme (2019), Section 2 will go to examination in Spring/Summer 2020.

2.33 Tendring District Council's existing Local Plan was adopted in 2007 and covers the period to 2011, but aspects of it are now considered out of date and not in accordance with National Planning Policy. According to Tendring District Council's website, until the new Local Plan is adopted, the planning policy situation is complex in that some elements of the 2007 Local Plan remain in force whilst others do not.

Colchester Borough Council

2.34 Section 1 of Colchester Borough Council's Local Plan has been considered through a joint Examination in Public, alongside Tendring District Council and Braintree District Council. The North Essex Authorities are now awaiting a response from the Inspector.

2.35 Section 2 of Colchester Borough Council's Local Plan contains policies and site allocations for meeting the needs of the Borough. Section 2 was submitted at the same time as Section 1, in October 2017. Colchester's Local Development Scheme is not up to date and it is therefore unclear when Section 2 will go to examination. According to the Council's website, an update will be posted when this information becomes available.

2.36 Colchester Borough Council's existing Local Plan consists of a Core Strategy (adopted in 2008 and amended in 2014), Site Allocations DPD (2010), Development Policies DPD (2010) and Tiptree Jam Factory DPD (2013).

2.37 According to the Core Strategy (2014), Colchester Borough Council will promote sustainable development and regeneration to deliver at least 14,200 jobs between 2001 and 2021 and at least 19,000 homes between 2001 and 2023. This growth will be located at the most accessible and sustainable locations. The Borough Council will also encourage economic development and plan for the delivery of at least 14,200 jobs between 2001 and 2021.

Braintree District Council

2.38 Section 1 of Braintree's Local Plan has been considered through a joint Examination in Public, alongside Tendring District Council and Colchester Borough Council. The North Essex Authorities are now awaiting a response from the Inspector.

2.39 As with the other North Essex Authorities, Section 2 of Braintree District Council's Local Plan was published in October 2017. According to the Council's Local Development Scheme, examination of Section 2 of the Local Plan is likely to take place in Spring/Summer 2020.

2.40 Braintree's existing Local Plan consists of a Core Strategy (2011), as well as Supplementary Planning Documents. A Pre-Submission Site Allocations and Development Management Plan (2014) was also developed

but at a Full Council meeting on 30th June 2014, Councillors took the decision to not submit the Site Allocations and Development Management Plan but to instead begin work immediately on a New Local Plan. The work completed on the Site Allocations and Development Management Plan, in addition to the comments which were received, will be rolled forward into the Local Plan process and form a large part of the Plan.

2.41 According to the Core Strategy (2011), Braintree District Council will plan, monitor and manage the delivery of a minimum of 4,637 dwellings between 2009 and 2026. These dwellings will be located within the main towns of Braintree, Witham and Halstead on previously developed and infill sites, as well as mixed use regeneration sites at Premdor/Rockways in Sible Hedingham and at the Crittalls site in Silver End, in addition to new mixed-use growth locations at north-west Braintree, south-west Witham and north-east of Witham.

2.42 Provision will also be made for 14,000 net additional jobs in the District between 2001 and 2026. Land for employment purposes will be mainly located on existing employment sites within the development boundaries of Braintree, Witham, Halstead and Great Notley, the six key service villages, Earls Colne Airfield, and Sturmer (adjoining Haverhill). Employment sites will also be located on mixed use regeneration sites in Sible Hedingham and Silver End, as well as on strategic employment sites: (1) Land to the north-west off Panfield Lane (15 hectares of employment land); and (2) Land to the west of the A131 at Great Notley (18.5 hectares of employment land).

West Suffolk Council

2.43 Forest Heath District Council and St Edmundsbury Borough Council were replaced by a single district council on 1st April 2019, called West Suffolk Council. The adopted Local Plans covering the former Forest Heath and St Edmundsbury areas will continue to apply to those parts of West Suffolk Council until a new Local Plan is adopted, which is scheduled for mid-2023.

2.44 An existing document, the Joint Development Management Policies Document (2015), applies to both former districts and sets out the policy context for which planning decisions should be determined – replacing many of the policies contained within each former local authorities' Local Plan.

Former Forest Heath District Council area

2.45 The former Forest Heath District Council area's Core Strategy Development Plan Document 2001-2026 (with housing projected to 2031) was adopted in 2010. The Single Issue Review (SIR) was then published in September 2019 to replace Policy CS7 in the Core Strategy. The SIR was prompted by a High Court challenge, which resulted in the

majority of Policy CS7 and elements of CS1, CS13 and paragraph 3.12.2 being revoked from the adopted Core Strategy. A Site Allocations Local Plan (2019) also forms part of the Local Plan and sets out site allocations within the former District.

2.46 Amended Policy CS7 makes provision for at least 6,800 new dwellings to be delivered in the period 2011-2031, as set out below:

- **Brandon:** 146 new homes
- **Mildenhall:** 1,599 new homes
- **Newmarket:** 1,090 new homes
- **Lakenheath:** 768 new homes
- **Red Lodge:** 1,786 new homes
- **Primary Villages:** 1,486 new homes
- **Other⁷:** 181 new homes
- **Windfall:** 225 new homes

2.47 With regard to employment, the Site Allocations Local Plan document designates five sites for employment use, which equates to around 23.6 hectares of new employment land:

- **Mildenham Academy and Dome Leisure Centre site, Mildenhall** (4 hectares)
- **St Leger, Newmarket** (1.6 hectares)
- **Land west of Mildenhall** (5 hectares)
- **Land north of Acorn Way, Red Lodge** (8 hectares)
- **Hatchfield Farm, Newmarket** (5 hectares)

Former St Edmundsbury Borough Council

2.48 The former St Edmundsbury Borough Council area's Core Strategy was adopted in 2010 and makes provision for at least 9,000 new homes between 2008 and 2031. These homes will be provided as follows:

- **2008-2016:** 481 per annum
- **2017-2021:** 577 per annum
- **2022-2031:** 583 per annum

2.49 With regard to employment, the Core Strategy states that provision will be made for development that will aim to deliver at least 13,000 additional jobs in the Borough by 2026. Employment land east of Suffolk Business Park, Bury St Edmunds (68.28 hectares) and Hanchett End at Haverhill (12

hectares) is allocated to enable the delivery of additional jobs in sustainable locations in the towns of Bury St Edmunds and Haverhill. Employment growth will also be achieved by the allocation of land for employment uses in mixed use developments in Bury St Edmunds, Haverhill, and the Key and Local Service Centres, and through policies supporting growth in the rural economy, retail, leisure and tourism.

2.50 Vision documents have also been adopted for the towns Bury St Edmunds and Haverhill, in addition to one for rural areas. These documents provide further detail on the policies set out in the Core Strategy, in addition to site allocations. The Vision documents for Bury St Edmunds and Haverhill guide the overall direction of future development and service provision within these towns for the next 20 years and beyond.

Breckland District Council

2.51 The Breckland Local Plan was adopted in November 2019. In order to meet future housing needs, the Local Plan seeks to provide no less than 15,289 new homes between 2011 and 2036, at an average of 612 dwellings per annum. The annualised level of new housing provision will increase during the plan period, from 584 per year from 2017/18-2021/22 to 622 per year from 2021/22. Housing growth will be distributed in line with the following individual settlement targets:

- **Key Settlements:** 50% (Attleborough and Thetford)
- **Market Towns:** 28% (Dereham, Swaffham and Watton)
- **Local Service Centres:** 15% (Ashill, Banham, Bawdeswell, Garboldisham, Great Ellingham, Harling, Hockering, Kenninghall, Litcham, Mattishall, Narborough, Necton, North Elmham, Old Buckenham, Shipdham, Sporle, Swanton Morley and Weeting).
- **Villages with Boundaries:** 7% (Beeston, Beetley, Carbrooke, Caston, Gressenhall, Griston, Hockham, Lyng, Mundford, North Lopham, Rocklands, Saham Toney, Thompson, Weasenham, Shopham, Eccles Road, Clint Green and Yaxham).

2.52 With regard to economic development, 64 hectares of employment land will be allocated for the period 2011-2036, at the following locations:

- **Attleborough:** at least 10 hectares
- **Dereham:** at least 3 hectares
- **Swaffham:** at least 8 hectares
- **Thetford:** at least 22 hectares

⁷ Other indicates completions and commitments within rural areas, secondary villages and small settlements.

- **Snetterton:** at least 20 hectares

South Norfolk Council

2.53 South Norfolk Council worked with Broadland District Council, Norwich City Council and Norfolk County Council as part of the Greater Norwich Development Partnership to produce a Joint Core Strategy. The Joint Core Strategy was adopted in March 2011, with amendments relating to housing growth in Broadland adopted in January 2014. It sets out the overarching strategy for growth across the three districts to 2026 and identifies key locations for housing and employment growth to ensure that future development is sustainable. According to the Joint Core Strategy, at least 36,820 new homes will be built between 2008 and 2026, in addition to 27,000 new jobs created.

2.54 A Site Specific Allocations and Policies Document (2015) and Development Management Policies Document (2015) also form part of South Norfolk's Local Plan. Guided by the Joint Core Strategy, the Site Specific Allocations and Policies Document designates areas of land to deliver housing, employment, recreation, open spaces and community uses. The Development Management Policies Document is used to assess planning applications and guide development proposals.

2.55 South Norfolk Council is currently working with Broadland District Council and Norwich City Council together with Norfolk County Council to develop the Greater Norwich Local Plan. The GNDP anticipates the publication of the final version of the Local Plan in 2021, and its adoption in 2022.

East Suffolk Council

2.56 Suffolk Coastal District Council and Waveney District Council were replaced by a single district council on 1st April 2019 called East Suffolk Council. There are two parts to the Local Plan in East Suffolk, the Suffolk Coastal Local Plan and the Waveney Local Plan.

2.57 The Suffolk Coastal Local Plan covers the former Suffolk Coastal District area and was submitted for Examination in March 2019. The new Suffolk Coastal Local Plan will replace the existing Suffolk Coastal Local Plan and cover the period 2018-2036. The new Local Plan makes provision for 37,328 dwellings across the Ipswich Housing Market Area over the period 2018-2036. Additionally, it proposes the creation of at least 30,320 jobs through the provision of at least 49.8 hectares of employment land across the Ipswich Functional Economic Area.

2.58 The existing Suffolk Local Plan comprises a Core Strategy and Development Management Policies Document (2013), which guides development in the District until 2027

and beyond. The document makes provision for at least 7,900 new homes across the District in the period 2010 to 2027.

- **Eastern Ipswich Plan Area:** 2,320 (136 per annum)
- **Felixstowe Walton and the Trimleys:** 1,760 (103 per annum)
- **Market Towns:** 1,520 (89 per annum)
- **Key and Local Service Centres:** 1,350 (79 per annum)
- **Rest of the District:** 100

2.59 With regard to the economy, provision will be made for at least 8.5 hectares of new employment land, which represents a contribution towards the creation of around 30,000 new jobs. These areas are identified as Strategic Employment Areas:

- Felixstowe Port
- Martlesham Heat Business Campus, including Adastral Park
- Ransomes Europark as part of a wider employment corridor extending into Ipswich Borough.

2.60 The Waveney Local Plan was adopted in March 2019 and applies to the part of East Suffolk formerly covered by the Waveney local planning authority area. The Local Plan makes provision for the delivery of 8,223 dwellings in Waveney (374 per year) over the period 2014-2036. This new residential development will be distributed across the District as follows:

- **Lowestoft Area:** 56% of housing growth
- **Beccles and Worlingham:** 16% of housing growth
- **Halesworth and Holton:** 8% of housing growth
- **Bungay:** 6% of housing growth
- **Southwold and Reydon:** 4% of housing growth
- **Rural Area:** 10% of housing growth

2.61 The Local Plan also seeks to maximise economic growth through the creation of 5,000 additional jobs in Waveney. To deliver this, provision has been made for 43 hectares of employment land for B1, B2 and B8 uses, and 2,200m² of convenience and 11,000m² of comparison retail floorspace. Employment land development will be focused mainly in Lowestoft and Beccles and distributed approximately as follows:

- **Lowestoft Area:** 60% of employment land development
- **Beccles:** 25% of employment land development
- **Other Market Towns and Rural Areas:** 15% of employment land development.

2.62 60-70% of retail and leisure development will be focused in Lowestoft Town Centre, with 15% in Beccles. The remaining proportion of development should come from within District Centres, Local Centres and Market Towns.

Ipswich Borough Council

2.63 The Ipswich Local Plan 2011-2031 was adopted in 2017 and comprises a Core Strategy and Policies Development Plan Document Review (2017), in addition to a Site Allocations and Policies Development Plan Document (2017). However, Ipswich Borough Council is now consulting on an updated Local Plan (2020), which consists of a Final Draft Core Strategy and Policies Development Plan Document Review, in addition to a Final Draft Site Allocations and Policies Development Plan Document.

2.64 According to the 2020 Core Strategy and Policies Development Plan Document Review (Final Draft), the Council has a housing requirement of at least 8,010 dwellings for the period 2018-2036. This equates to an annual average of at least 445 dwellings. The Council will additionally allocate land to provide for at least 6,100 dwellings in the Borough. The Ipswich Garden Suburb development will contribute significantly to meeting the housing needs of the Borough throughout the plan period.

2.65 Sites are identified through the Site Allocations and Policies Development Plan Document in accordance with the spatial strategy in the Core Strategy, in addition to the land allocated at the Ipswich Garden Suburb and the northern end of Humber Doucy Lane. 700 dwellings are expected to be delivered on small windfall sites between 2022 and 2036 at a rate of 50 per year. The housing land supply for the plan period (2018-2036) will consist of:

- **Ipswich Garden Suburb** (3,500 minus 232 completions expected late 2036): 3,268
- **Northern end of Humber Doucy Lane allocated through Policy ISPA4** (Ipswich Strategic Planning Area 4: Cross Boundary Working to Deliver Sites): 496
- **Site Allocations through Policy SP2** (Land Allocated for Housing) of the Site Allocations Plan: 2,750
- **Windfall sites (2022-2036):** 700 (50 per annum).

2.66 With regard to employment, Ipswich Borough Council will encourage the provision of approximately 9,500 jobs in the Borough between 2018 and 2036 by allocating a range and choice of sites amounting to at least 23.2ha of land for employment development (in use classes B1, B2 and B8). The Council will also protect existing employment land for employment use.

Nationally Significant Infrastructure Projects

2.67 Development in BMSDC could have an effect on Nationally Significant Infrastructure Projects (NSIPs). NSIPs within and outside of BMSDC that may affect or be affected by development are set out below.

Progress Power

2.68 A rapid response gas-fired power plant referred to as Progress Power, was granted planning permission on 23rd July 2015 by the Secretary of State for Energy and Climate Change. The power station will be located in the north of BMSDC, 1km north west of the village of Eye, 4km south of the town of Diss and adjacent to the A140, which links Ipswich to Norwich.

2.69 The power station site covers an area of approximately 10ha and is located within the Eye Airfield business and industrial estates. There will be one stack (chimney) at the power station, up to 35 metres in height. A plume consisting mainly of water vapour may be visible from the stack under certain environmental conditions but will not cause harm to people or the environment. The emissions will be strictly limited by the Environment Agency as part of an operational Environmental Permit.

2.70 The noise produced during the power station's operation will be strictly limited by both the Development Consent Order issued by the Secretary of State and limits set by the Environment Agency as part of the operational Environmental Permit. The combustion of natural gas in a power station does not produce any noticeable odour.

2.71 There will be HGV traffic during the construction phase, but it would be routed to minimise congestion, noise and dirt away from Eye, Mellis and Yaxley, and other places. Once operational, there will be a negligible increase in traffic movements.

Sizewell C

2.72 Sizewell C is a proposed nuclear power station on the Suffolk Coast in the East Suffolk Council area, which neighbours BMSDC. The application for this Nationally Significant Infrastructure Project is likely to be submitted in the first quarter of 2020.

Chapter 3

Population, Health and Wellbeing

Policy context

International

3.1 United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the ‘Aarhus Convention’) (1998)⁸: Establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective.

3.2 United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002)⁹: Sets a broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.

3.3 European Environmental Noise Directive (2002)¹⁰: Sets out a hierarchy for the avoidance, prevention and reduction in adverse effects associated with environmental noise, including noise generated by road and rail vehicles, infrastructure, aircraft and outdoor, industrial and mobile machinery.

National

3.4 National Planning Policy Framework (NPPF)¹¹ sets out the following:

- The NPPF promotes healthy, inclusive and safe places which promote social integration, are safe and accessible, and enable and support healthy lifestyles.
- One of the core planning principles is to “take into account and support the delivery of local strategies to

⁸ United Nations (1998) Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters: <https://www.unece.org/fileadmin/DAM/env/pp/documents/cep43e.pdf>.

⁹ United Nations (2002) Declaration on Sustainable Development (Johannesburg Declaration): https://ec.europa.eu/environment/archives/wssd/documents/wssd_pol_declarati on.pdf.

¹⁰ European Commission (2002) Environmental Noise Directive: https://ec.europa.eu/environment/noise/pdf/study_evaluation_directive_environmental_noise.pdf.

¹¹ Ministry of Housing, Communities and Local Government (last updated 19 June 2019) National Planning Policy Framework: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf.

improve health, social and cultural well-being for all sections of the community”.

- Local plans should “contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible”. To determine the minimum number of homes needed strategic policies should be informed by the application of the standard method set out in national planning guidance, or a justified alternative approach.
- “A network of high-quality open spaces and opportunities for sport and recreation is important for the health and well-being of communities”.
- “Good design is a key aspect of sustainable development” and requires development supported by planning decisions to function well and add to the overall quality of the area over its lifetime. Planning decisions should result in development which is of a quality which incorporates good architecture and appropriate and effective landscaping as to promote visual attractiveness, raises the standard more generally in the area, and addresses the connections between people and places.
- The promotion of retaining and enhancing of local services and community facilities in villages, such as local shops, meeting places, sports, cultural venues and places of worship.
- Developments should create safe and accessible environments where crime and disorder, and fear of crime, do not undermine quality of life or community cohesion.
- There is a need to take a “proactive, positive and collaborative approach” to bring forward development that will “widen choice in education”, including sufficient choice of school places.
- Paragraph 72 states that “The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed and supported by the necessary infrastructure and facilities”. As such the NPPF provides support for the identification of locations which are suitable for this type

of development in a manner which would help to meet needs identified in a sustainable way.

3.5 Select Committee on Public Service and Demographic Change Report: Ready for Ageing?¹²: warns that society is underprepared for the ageing population. The report states that “longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises”. The report highlights the under provision of specialist housing for older people and the need to plan for the housing needs of the older population as well as younger people.

3.6 Fair Society, Healthy Lives¹³: Investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is “overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities”.

3.7 Planning Policy for Traveller Sites¹⁴: Sets out the Government’s planning policy for traveller sites, replacing the older version published in March 2012. The Government’s overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

3.8 Laying the foundations: a housing strategy for England¹⁵: Aims to provide support to deliver new homes and improve social mobility.

3.9 Healthy Lives, Healthy People: Our strategy for public health in England¹⁶: Sets out how the Government’s approach to public health challenges will:

- Protect the population from health threats – led by central government, with a strong system to the frontline.
- Empower local leadership and encourage wide responsibility across society to improve everyone’s health and wellbeing and tackle the wider factors that influence it.
- Focus on key outcomes, doing what works to deliver them, with transparency of outcomes to enable

¹² Select Committee on Public Service and Demographic Change (2013) Ready for Ageing?

<https://publications.parliament.uk/pa/ld201213/ldselect/ldpublic/140/140.pdf>.

¹³ The Marmot Review (2011) Fair Society, Healthy Lives:

<http://www.parliament.uk/documents/fair-society-healthy-lives-full-report.pdf>.

¹⁴ Department for Communities and Local Government (2015) Planning policy for traveller sites: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>.

¹⁵ HM Government (2011) Laying the Foundations: A Housing Strategy for England:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7532/2033676.pdf.

¹⁶ HM Government (2010) Healthy Lives, Healthy People: Our strategy for public health in England:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/216096/dh_127424.pdf.

accountability through a proposed new public health outcomes framework.

- Reflect the Government's core values of freedom, fairness and responsibility by strengthening self-esteem, confidence and personal responsibility; positively promoting healthy behaviours and lifestyles; and adapting the environment to make healthy choices easier.
- Balance the freedoms of individuals and organisations with the need to avoid harm to others, use a 'ladder' of interventions to determine the least intrusive approach necessary to achieve the desired effect and aim to make voluntary approaches work before resorting to regulation.

3.10 A Green Future: Our 25 Year Plan to Improve the Environment¹⁷: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. It identifies six key areas around which action will be focused. Those of relevance to this chapter are: using and managing land sustainably; and connecting people with the environment to improve health and wellbeing. Actions that will be taken as part of these two key areas are as follows:

- Using and managing land sustainably:
 - Embed an 'environmental net gain' principle for development, including housing and infrastructure.
- Connecting people with the environment to improve health and wellbeing:
 - Help people improve their health and wellbeing by using green spaces including through mental health services.
 - Encourage children to be close to nature, in and out of school, with particular focus on disadvantaged areas.
 - "Green" our towns and cities by creating green infrastructure and planting one million urban trees.
 - Make 2019 a year of action for the environment, working with Step Up To Serve and other partners to help children and young people from all

backgrounds to engage with nature and improve the environment.

Sub-national

3.11 Babergh and Mid Suffolk Infrastructure Delivery Plan (2019)¹⁸: Aims to consider all infrastructure needs to enable sustainable development and growth supporting residents, businesses, communities, the environment and individuals. A key objective is prioritising investment into strategic services and infrastructure. The report also considers collaboration of organisations to provide funding and the phasing of infrastructure may occur depending on the degree of growth.

3.12 Babergh and Mid Suffolk Open Space Study (2019): Provides an audit of the quantity and quality of existing provision in the Districts and assesses the need for future provision.

3.13 Joint Homelessness Reduction and Rough Sleeping Strategy¹⁹: This Strategy covers the period 2019-2024 and sets out what BMSDC will do to prevent or relieve homelessness.

3.14 Joint Health and Wellbeing Board Strategy Refresh 2019-2022²⁰: The document provides a refresh on Suffolk's Joint Health and Wellbeing Strategy 2012-2022 and helps to guide the work of a range of statutory, voluntary, community and private sector agencies committed to improving health and wellbeing in Suffolk.

3.15 Transforming Suffolk, Suffolk's Community Strategy 2008 to 2028²¹: Sets out ambitions for Suffolk to be recognised for its outstanding environment and quality of life for all. The strategy aims to help make Suffolk the greenest county by enhancing the natural environment while also being an exemplar when tackling climate change. The aim is also to create a prosperous and vibrant economy; learning and skills for the Future; and safe, healthy and inclusive communities.

Current baseline

Population

3.16 The latest statistics found that in 2018, Babergh District had a population of 91,400 people, with 52,100 of these

¹⁷ HM Government (2018) A Green Future: Our 23 Year Plan to Improve the Environment: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf.

¹⁸ BMSDC (2019) Infrastructure Delivery Plan: <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/BMSDC-IDP-July-2019-.pdf>.

¹⁹ BMSDC (2019) Joint Homelessness Reduction and Rough Sleeping Strategy 2019-2024: <https://www.babergh.gov.uk/assets/Housing-and-Homelessness/Housing-Strategy/HRRSS-2019-2024-Final.pdf>.

²⁰ Health and Wellbeing Suffolk (2019) Joint Health and Wellbeing Board Strategy Refresh: <https://www.suffolk.gov.uk/assets/council-and-democracy/our-aims-and-transformation-programmes/Joint-Health-and-Wellbeing-Board-Strategy-Refresh-2019-2022.pdf>.

²¹ Suffolk Strategic Partnership (2008) Transforming Suffolk, Suffolk's Community Strategy 2008-2028: https://www.ipswich.gov.uk/sites/default/files/scd07_-_suffolk_community_strategy.pdf.

residents aged 16-64²². Mid Suffolk District had a population of 102,500 people in 2018, with 60,300 residents aged 16-64²³. Babergh District's population is expected to grow to 96,400 people²⁴ and Mid Suffolk District's population is projected to reach 109,000 people by 2031²⁵.

3.17 Babergh has two main towns being the market town of Sudbury in the west and the town of Hadleigh in the centre. Mid Suffolk has three market towns being Stowmarket and Needham Market in the south of the District, and Eye in the north. Both Districts have many rural villages and open countryside where in Babergh 69% and in Mid Suffolk 75% of the population live. Overall, Babergh District has around 1.54 persons per hectare while Mid Suffolk District has a slightly lower population density at around 1.18 hectares per person²⁶.

3.18 According to BMSDC's Joint Annual Monitoring Report²⁷, both Districts have similar demography with fewer younger people and an increasing proportion of older people. Both Districts have an ageing population, and this trend is expected to continue over the next ten years²⁸.

3.19 In Babergh District the population has remained fairly consistent with 53,800 individuals aged 16-64 in 2008, to 52,100 in 2018²⁹. Between October 2018 and September 2019 there were 4,400 retired residents who represented 35.4% of the District's population. Students made up 3,500 residents between October 2018 and September 2019 which is 28.4% of the District's population³⁰.

3.20 In Mid Suffolk District, many of the sample population sizes were too small for reliable estimates. Despite this, the latest data found that between October 2017 and Sept 2018, 3,900 residents were retired, making up 37.6% of the population. The last estimate for the number of students in the District was 3,300 people between October 2015 and September 2016 at 3,300 people, 24.9% of the population.

3.21 The 2011 Census found that ethnic minorities constituted around 2.2% of Babergh District population which is around 1,895 individuals. The largest ethnic minority group

were the mixed/multiple ethnic groups which made by 0.9% of the population, followed by Asian/Asian British at 0.8%³¹.

3.22 For Mid Suffolk District, the 2011 Census showed that ethnic minorities constituted around 2.1% of the total population. The largest ethnic minority group were Asian/Asian British which made up 0.7% of the total population, followed by Black/African/Caribbean/Black British at 0.4%.

Housing

Provision and affordability

3.23 In the past few years local house prices in BMSDC have steadily increased which has had an effect on affordability³².

3.24 The table below shows the housing affordability ratio across the Districts which is calculated by dividing average house prices by average annual earnings to create a ratio. House prices are taken from House Price Statistics for Small Areas (HPSSAs). However, the statistics are also partially based on a survey sample of earnings data. Therefore, the data should be interpreted over a longer time series³³.

Table 3.1: Babergh and Mid Suffolk: Ratio of Workplace-based Median House Price to Median Earnings Ratio

Area	2014	2015	2016	2017	2018	2019
Babergh	8.91	9.23	9.48	11.26 *	10.77	11.39
Mid Suffolk	7.35*	8.02	7.53	8.98	10.20	9.46
Suffolk	7.01	7.20	7.65	8.04	8.69	8.86
East of England	7.43	7.83	8.42	8.96	9.66	9.72

NB ratios marked with * have been calculated using annualised weekly earnings.

²² NOMIS (2018) Labour Market Profile – Babergh: <https://www.nomisweb.co.uk/reports/lmp/la/1946157239/report.aspx?town=Babergh#tabrespop>.

²³ NOMIS (2018) Labour Market Profile – Mid Suffolk: <https://www.nomisweb.co.uk/reports/lmp/la/1946157242/report.aspx?town=Mid%20Suffolk#tabrespop>.

²⁴ Population Projections Babergh: <https://www.suffolkobservatory.info/population/report/view/17e45add2fd547c38a1a20bc2635673b/E07000200/>.

²⁵ Population Projections Mid Suffolk: <https://www.suffolkobservatory.info/population/report/view/17e45add2fd547c38a1a20bc2635673b/E07000203/>.

²⁶ Local Government Association (2019) Population density, persons per hectare in England: <https://lgaform.local.gov.uk/reports/lgastandard?mod-metric=176&mod-area=E92000001&mod-group=E07000203&mod-type=area>.

²⁷ BMSDC (2018-19) Annual Monitoring Report 2018-19: <https://www.babergh.gov.uk/assets/Strategic-Planning/AMR/Babergh-and-Mid-Suffolk-Annual-Monitoring-Report-2018-19.pdf>.

²⁸ BMSDC (2018-19) Annual Monitoring Report 2018-19: <https://www.babergh.gov.uk/assets/Strategic-Planning/AMR/Babergh-and-Mid-Suffolk-Annual-Monitoring-Report-2018-19.pdf>.

²⁹ NOMIS Population Aged 16-64 – Time Series: https://www.nomisweb.co.uk/reports/lmp/la/1946157239/subreports/wapop_time_series/report.aspx?.

³⁰ NOMIS Economically Inactive – Time Series: https://www.nomisweb.co.uk/reports/lmp/la/1946157239/subreports/einact_time_series/report.aspx?.

³¹ NOMIS Babergh Area Profile: <https://www.nomisweb.co.uk/reports/localarea?compare=E07000200>.

³² Annual Monitoring Report (2018-19) <https://www.babergh.gov.uk/assets/Strategic-Planning/AMR/Babergh-and-Mid-Suffolk-Annual-Monitoring-Report-2018-19.pdf>.

³³ Office for National Statistics (2018) Housing affordability in England and Wales 2018: <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2018>.

3.25 In 2018-2019, the target in the Babergh District was to build 420 new dwellings. However, this was exceeded with 579 new dwellings being built, representing 138% of the annual target set by the national standard methodology. In Mid Suffolk the target was 556 new dwellings but 690 were built, representing 124% of the annual target. Therefore, overall, in the latest year for which data are available, both Babergh District and Mid Suffolk District exceeded their housing targets.

3.26 The two tables below show the percentage of affordable homes built in the Districts over the last 5 years. In 2018/19 only 12% of homes built in Babergh were affordable housing, compared to 36% in 2017/18. For Mid Suffolk in 2018/19, only 10% of homes were affordable housing, compared to 27% in 2017/18. Therefore, the proportion of affordable homes built in the previous two years has decreased and in 2018/19 were below the averages for the last five years.

Table 3.2: Babergh Net Residential Completions by Annual Monitoring Report Year

Babergh					
AMR Year	Net Completions (A)	of which Affordable (B)	% Affordable (B as % of A)	No. of Windfall (C)	% Windfall (C as % of A)
2018/19	579	69	12%	456	79%
2017/18	331	118	36%	221	67%
2016/17	226	24	11%	168	74%
2015/16	157	31	20%	124	79%
2014/15	172	31	18%	83	48%
Totals	1465	273	-	1052	-

Table 3.3: Mid Suffolk Net Residential Completions by Annual Monitoring Report Year

Mid Suffolk					
AMR Year	Net Completions (A)	of which Affordable (B)	% Affordable (B as % of A)	No. of Windfall (C)	% Windfall (C as % of A)
2018/19	690	70	10%	583	84%
2017/18	426	114	27%	292	69%
2016/17	305	53	17%	230	75%

Mid Suffolk					
AMR Year	Net Completions (A)	of which Affordable (B)	% Affordable (B as % of A)	No. of Windfall (C)	% Windfall (C as % of A)
2015/16	304	78	26%	240	79%
2014/15	416	46	11%	246	59%
Totals	2141	361	-	1591	-

3.27 In November 2019, the mean price of dwellings in Babergh District and Mid Suffolk District was £292,305 and £262,988 respectively. This is above the national average of £251,222 and for Babergh, is also above the regional average of £291,281³⁴.

3.28 A suitable mix of housing is important to ensure all housing needs are met within the District. The 2011 Census identified the housing stock within the District and is shown in the table below. The majority of housing within both Districts is detached houses, followed by semi-detached, then terraced houses and finally flats.

Table 3.4: Type of dwellings and number of households in Babergh and Mid Suffolk (excluding Caravans and other mobile and temporary structures)

Type of Dwelling	Number of Households (2011)			
	Babergh	%	Mid Suffolk	%
Detached Houses	16,231	42	19,908	47
Semi-detached Houses	11,476	30	13,676	33
Terraced Houses	8,458	21	5,753	14
Flats	2,763	7	2,317	6
Total	38,928	100	41,654	100

3.29 As set out in the Strategic Housing Market Assessment (SHMA) (Part 2 update)³⁵, the majority of homes across all tenures are large family units, with the owner-occupied sector comprising 66.7% of all homes. The Social Rent/Affordable Rent tenure currently stands at 14.6%. The SHMA shows that in 18 years' time, 65.9% of all new housing in the Ipswich Housing Market Area (which includes BMSDC), should be owner-occupied and 14.5% Social Rent/Affordable Rent.

³⁴ UK House Price Index (2020) House Price Statistics: <https://landregistry.data.gov.uk/app/ukhpi>.

³⁵ Peter Brett Associates (2019) Ipswich Housing Market Area: <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/SHMA-Part-2-update-2019.pdf>.

3.30 As mentioned previously, both Districts have an ageing population. According to the Suffolk Housing and Health Needs Assessment³⁶, approximately 6,000 over 75s who need specialist housing (defined as sheltered, extra care, residential care or nursing home) already have difficulties accessing housing provision in Suffolk County. Furthermore, there are an estimated 10,687 properties in Suffolk which do not meet the Decent Home Standard under the Housing Health and Safety rating because they are excessively cold. Indeed, the housing stock in Suffolk is predominantly old and inefficient to heat.

3.31 In addition to older people, other vulnerable people may also have specialist housing needs. Suffolk is currently significantly worse than the England average at meeting the need of residents with learning difficulties for secure and appropriate accommodation. According to the same document, the number of people with a learning difficulty is forecast to increase by 9% by 2035. As such, there will be an increased demand for housing that meets specialist needs.

Homelessness

3.32 Table 3.5 shows an estimation of the number of rough sleepers recorded over the past five years in BMSDC, using Homeless Link. The number of people sleeping rough within the Districts has decreased, which may be related to the fact BMSDC were successful in jointly bidding with West Suffolk Councils through the 'Trailblazer' programme in 2016 for a Rough Sleeper Prevention and Support Worker.

Table 3.5: Estimated rough sleeper count in BMSDC (November)

	2014	2015	2016	2017	2018
Babergh	0	2	7	1	0
Mid Suffolk	0	2	1	2	0

Gypsy, Traveller and Travelling Showpeople

3.33 A report commissioned by BMSDC featured 100 surveys being completed by Gypsy and Traveller families between November 2016 and January 2017³⁷. There were 87 surveys completed by those on authorised sites, eight on unauthorised developments, three on unauthorised encampments and two families residing on sites with temporary planning permission.

The majority of families had lived on site for more than five years and most were not intending to move in the future.

3.34 Those residing on local authority sites were concerned about the quality and provision of sites resulting in children only being able to safely play on pitches rather than freely on the site, sites being too small to accommodate, too big leading to a mixture of occupants who do not get on and not feeling safe. Families also stated that obtaining planning permission was an issue, as it was felt that there were preconceptions by the wider community.

3.35 There are seven permanent Travelling Showpeople plots in Mid Suffolk and there is a long history of Travelling Showpeople both living and working in the study area. Travelling Showpeople recorded fewer health issues, compared to Gypsies and Travellers. In 2016 all families had travelled, mainly for work, and no families stated that they intended to stop travelling. All of the families own their plots and around a third of families stated they had young members who will require separate accommodation within the next five years, but all would prefer to stay within the local area.

3.36 To establish the number of households residing in boat, postal surveys were completed, and Council Tax records were established. There were 21 permanent boat moorings in Babergh however, this could be an underestimate due to the difficulties in identifying the status and locations of houseboats.

3.37 Only one caravan was recorded in Babergh and 108 caravans in Mid Suffolk. Therefore, when population is taken into account, the density of caravans varies with Babergh having 1 caravan per 100,000 of the population and Mid Suffolk having 109 per 100,000 of the population. The average in England is around 39 caravans per 100,000 of the population and the regional average is 81³⁸.

Education

3.38 Around 19% of the population across Babergh and Mid Suffolk are aged 0-17 years old. Around 2.8% (4,220) are school children and full-time students aged 16-17 which is slightly above the national average of 2.7%. However, 2% (2,970) are school children and full-time students aged 18 and over which is below the national average of 5.5%³⁹.

3.39 The 2011 Census data found 22.5% (33,988) of Babergh and Mid Suffolk residents have no qualifications, 4% (6,065)

³⁶ Suffolk County Council (2018) Suffolk Housing and Health Needs Assessment:
https://www.healthysuffolk.org.uk/uploads/Suffolk_Housing_and_Health_Final_Mar18HWPB.pdf.

³⁷ BMSDC (2017) Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment:
<https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Final-ANA-Report-May-2017.pdf>.

³⁸ BMSDC (2017) Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment:
<https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Final-ANA-Report-May-2017.pdf>.

³⁹ Children & Young People Area Report Suffolk Observatory:
<https://www.suffolkobservatory.info/children-and-young-people/report/view/a35c270f84c849c797187ff085340613/SHA1/>.

completed an apprenticeship, 14.2% (21,348) have Level 1 qualifications and 26.15 (33,988) have Level 4 and above qualifications^{40,41}. The amount of people with no qualifications is equal to the national average and higher than the County average (24.3%). However, the amount of people with Level 4 qualifications and above is lower than the national average (27.4%).

3.40 The location of education facilities in the Districts is shown in **Figure 3.1**.

Deprivation

3.41 In 2019 Babergh ranked 212 out of 317 local authorities in England (1 being the most deprived), compared with a ranking of 197 in 2015. The Index of Multiple Deprivation (IMD) uses Lower Layer Super Output Areas (LSOA) to measure deprivation at local authority and county level. There are 54 LSOAs in Babergh. Around Sudbury and Great Cornard there are pockets of deprivation and some rural areas are particularly deprived in terms of access to housing and other services. Babergh 008A is located on the edge of Sudbury, the most deprived area within the District and ranked 7,697 out of 32,844 LSOAs in England. This area is amongst the top 20% most deprived neighbourhoods in England⁴².

3.42 In 2019 Mid Suffolk ranked 229 out of 317 local authorities in England, where 1 is the most deprived, compared with a ranking of 233 in 2015. There are 56 LSOAs in Mid Suffolk. The Districts most deprived areas are around Stowmarket, with Mid Suffolk 008C being ranked 3,344 out of 32,844 LSOAs in England. In 2015, this area was ranked 5,405 and therefore, there has been a decrease in deprivation in comparison to other LSOA areas in England. This area is amongst the top 20% most deprived neighbourhoods in England.

3.43 In Babergh it was estimated that 3,863 out of 39,487 households were fuel poor in 2016, which equates to 9.6% of all households in the District. In Mid Suffolk 4,048 out of 42,263 households were fuel poor in 2016, which also equates to 9.6% of total households in the District. Both Districts are slightly above the average for the East of England at 9.4%⁴³.

3.44 According to Public Health England, 11.3% (1,615) of children in Babergh live in low-income families and 10.1% in (1,590) Mid Suffolk⁴⁴.

3.45 The distribution of deprivation across the Districts is shown in **Figure 3.2**.

Health

3.46 Health is a cross-cutting topic and as such many topic areas explored in this Scoping Report influence health either directly or indirectly. The 2011 Census statistics suggest that health in Babergh is generally good with 82.4% of the population reporting themselves to be in very good or good health. Some 13.2% state they are in fair health, with only 3.4% and 0.9% in bad or very bad health respectively. Similarly, the 2011 Census statistics suggest that health in Mid Suffolk is generally good with 83.2% of the population reporting themselves to be in very good or good health. Some 12.9% state they are in fair health, with only 3.1% and 0.8% in bad or very bad health respectively. Therefore, perceived health levels in the Districts are relatively good.

3.47 The 2011 Census also found that 82.6% of the population in Babergh and 83.4% in Mid Suffolk state that their day-to-day activities are not limited by their health. In Babergh 10.2% said they are limited a little and 7.2% said they are limited a lot. For Mid Suffolk, 9.9% said they are limited a little and 6.7% said they are limited a lot.

3.48 The 2011 Census data found that 6,819 people in Babergh and 7,418 in Mid Suffolk provide 1 to 19 hours of unpaid care a week. Furthermore, 1,877 people in Babergh and 1,995 in Mid Suffolk provide 50 or more hours of unpaid care a week.

3.49 Life expectancy in Babergh is 81.6 for males and 84.7 for females⁴⁵, while in Mid Suffolk life expectancy is 79.6 for males and 83.2 for females⁴⁶. Life expectancy in Babergh is 6.5 years lower for men and 4.3 years lower for women in the most deprived areas, while in Mid Suffolk it is 6.4 years lower for men and 3.6 years for women⁴⁷.

3.50 The distribution of health facilities in the Districts is shown in **Figure 3.1**.

⁴⁰ Level 1 = 1-4 O Levels/CSE/GCSEs and NWQ Level 1; Level 4 = Degree, Higher Degree, NVQ Level 4-5, HNC, HND.

⁴¹ Children & Young People Area Report Suffolk Observatory: <https://www.suffolkobservatory.info/children-and-young-people/report/view/a35c270f84c849c797187ff085340613/SHA1/>.

⁴² Indices of Deprivation: http://dclgapps.communities.gov.uk/imd/iod_index.html#.

⁴³ Gov.uk (2018) Sub-regional fuel poverty: <https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-data-2018>.

⁴⁴ Public Health England (2019) Babergh Local Authority Health Profile: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000200.html?area-name=babergh>.

⁴⁵ Public Health England (2019) Babergh Local Authority Health Profile: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000200.html?area-name=babergh>.

⁴⁶ Public Health England (2019) Mid Suffolk Local Authority Health Profile: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000203.html?area-name=mid%20suffolk>.

⁴⁷ Public Health England (2019) Mid Suffolk Local Authority Health Profile: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000203.html?area-name=mid%20suffolk>.

Open spaces, sports and recreation

3.51 Babergh and Mid Suffolk covers a total area of approximately 565 square miles. In Babergh there are two main towns and the landscape is varied consisting mainly of undulating arable farmland with river valleys. The Orwell and Stour estuaries are found on the eastern and south-eastern sides of the District which have valued wildlife habitats and a distinct character. The southern and eastern parts of the District are also Areas of Outstanding Natural Beauty (AONBs)⁴⁸.

3.52 Mid Suffolk is made up of a combination of market towns, villages and countryside. The north of the District contains the valleys of the River Waveney and Dove and the south includes open fields of High Suffolk to the Valleys of the River Ratt and Gipping in the south.

3.53 Babergh and Mid Suffolk Open Spaces Assessment⁴⁹ assessed the quality of 519 open spaces in the Districts using criteria set out in the Green Flag Award. The study was a technical assessment and not a full local needs assessment or extensive consultation to inform recommendations. The assessment calculated the amount of existing open space for a range of different use.

Table 3.6: Summary of Open Spaces in Babergh and Mid Suffolk

Typology	Existing (ha)	Per 1,000 people (ha)	Quantity Standards Per 1,000 people (ha)
Accessible Natural Greenspace	900.6	4.88	ANGSt*
Amenity Greenspace	233.62	1.27	1.0
Parks and Recreation Grounds	163.16	0.93	1.0
Parks and Recreation Grounds including Outdoor Sport	170.68	0.88	1.0
Open Space for Children	11.35	0.06	0.06
Open Space for Youth	2.48	0.01	0.04
Sports Club Space	68.39	0.37	N/A

*Natural England Accessible Natural Green Space Standards

3.54 Natural England Accessible Natural Green Space Standards (ANGSt) are:

- at least one accessible 20-hectare site within two kilometres of home;
- one accessible 100-hectare site within five kilometres of home; and
- one accessible 500-hectare site within ten kilometres of home; plus
- a minimum of 1 hectare of statutory Local Nature Reserves per thousand population at least 2 hectares in size, no more than 300 metres (5 minutes' walk) from home.

3.55 The table shows that there is more than the set quantity standard of amenity greenspace⁵⁰ per 1,000 of the population. However, parks and recreation grounds are under the set quantity standard even when outdoor sport is included.

3.56 As part of the assessment, a survey with BMSDC parishes was undertaken, which saw 75 responses from 199 parishes. Results found that 68% of Town/Parish Councils were directly responsible for the management of various local spaces and outdoor recreational facilities and 64% of local councils noted a need for additional or improved open space, play and outdoor recreation facilities. Other results found there is not enough space for teenagers (e.g. skateparks and shelters) and there is a need for additional multi-use games areas (MUGAs).

3.57 The distribution of open space in the Districts is shown in **Figure 3.3**.

Crime

3.58 In December 2019, there was an increase in burglaries, criminal damage and arson, drugs, theft and weapons possession in Suffolk, from the previous three months⁵¹.

Key sustainability issues

3.59 The key sustainability issues for population, health and well-being, and their likely evolution without the JLP are shown in **Table 3.7**.

⁴⁸ BMSDC (2019) Open Space Assessment: <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Babergh-and-Mid-Suffolk-Open-Space-Study-May-2019.pdf>.

⁴⁹ BMSDC (2019) Open Space Assessment: <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Babergh-and-Mid-Suffolk-Open-Space-Study-May-2019.pdf>.

⁵⁰ Amenity greenspace includes open to free land that is not laid out a certain way or does not have a specific function, such as a park or public playing field.

⁵¹ UK Crime Stats (2020) Suffolk County Council, England: <https://www.ukcrimestats.com/Subdivisions/CTY/2241/>.

Table 3.7: Key sustainability issues and likely evolution without the Joint Local Plan

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA Objectives
BMSDC has an ageing population, which has the potential to result in pressure on the capacity of local services and facilities, such as GP surgeries and hospitals. An ageing population also requires a mixture of housing that will meet the needs of older people, whilst also freeing up houses for younger residents. Current housing stock is predominantly old and inefficient to heat, and therefore unsuitable.	<p>Policy CS21 (Infrastructure Provision) in Babergh's Core Strategy (2014) seeks to protect, safeguard and enhance existing services, facilities and amenities to support members of the community. For Core and Hinterland Villages, Policy CS11 (Strategy for Development for Core and Hinterland Villages) states that new retail, leisure and community uses appropriate to the area, will be encouraged. Additionally, Policy CS16 (Town, Village and Local Centres) promotes service provision in Sudbury and Hadleigh, as well as village and local centres. With regard to housing, Policy CS18 (Mix and Types of Dwellings) seeks to provide residential development that particularly meets the needs of older people, whilst Policy CS12 (Sustainable Design and Construction Standards) states that large scale residential developments will be expected to achieve the Building for Life Silver Standard.</p> <p>In Mid Suffolk's Core Strategy (2008), Policy CS6 (Services and Infrastructure) states that new development will be expected to provide or support the delivery of appropriate and accessible infrastructure to meet the justifiable needs of new development. It specifically states that local priorities for which infrastructure contributions may be sought include healthcare, social and community facilities, village services and facilities, community safety and improvements to public transport. In relation to housing, Policy CS9 encourages the provision of a mix of house types, sizes and affordability.</p> <p>Without the JLP, services would likely still be retained and provided during the current plan period of both areas. Babergh's most up-to-date document in the Local Plan, the Core Strategy, covers the period up to 2031, whilst Mid Suffolk's Core Strategy covers the period up to 2026. With the existing Local Plan, a mixture of housing may not be achieved and designed to be energy efficient. The JLP offers an opportunity to deliver the required services and facilities in a coherent, sustainable manner alongside new development that keeps pace with demand, whilst also requiring certain standards of energy efficiency to be achieved.</p>	SA Objectives 1, 3, 4.
There is a need for affordable housing in BMSDC because at present, the mean price of dwellings is higher than the national average and for Babergh, is also higher than the regional average. The proportion of new homes that are affordable are below targets.	<p>Policy CS19 (Affordable Homes) in Babergh's Core Strategy (2014) requires the provision of 35% affordable housing in new developments. Where a development is for one or two dwellings and affordable homes cannot be provided on site, a commuted sum will be required. Policy CS18 (Mix and Types of Dwellings) states that the mix, type and size of housing developments will be expected to reflect established needs in Babergh District.</p> <p>Policy CS9 (Density and Mix) in Mid Suffolk's Core Strategy (2008) states that new housing development should provide a mix of house types, sizes and affordability to cater for different accommodation needs. More specifically, Altered Policy H4 (A Proportion of Affordable Housing in New Housing Developments) contained within the First Alteration to the Mid Suffolk Local Plan (2006) requires the provision of 35% affordable housing as follows:</p> <ul style="list-style-type: none"> - sites of 15 dwellings or more or sites of 0.5 hectares and above, in Stowmarket and Needham Market; - sites of 5 dwellings or more or sites of 0.17 hectares and above, in the remainder of Mid Suffolk. <p>On rural exception sites, Altered Policy H5 (Affordable Housing on Rural Exception Sites) states that permission may be granted for development as an exception to normal planning policy.</p> <p>Without the JLP, provision would continue to be made for affordable housing over the existing plan periods. However, house prices would continue to rise and remain an issue. The JLP provides an opportunity to facilitate and expedite the delivery of affordable housing, whilst also supporting the provision of a more appropriate mix of new homes to meet the needs of a growing population.</p>	SA Objective 4.
There are a number of vulnerable people, including people with learning difficulties, who have specialist housing needs (defined as sheltered, extra	In Babergh's Core Strategy (2014), Policy CS18 requires a mix of housing that reflects established needs in the District. However, the policy doesn't specifically require the delivery of specialist housing. Despite this, Saved Policy HS39 (Special Needs Housing) in Babergh's Local Plan Alteration No. 2 encourages planning applications for nursing, residential care, rest homes and sheltered housing.	SA Objective 4.

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA Objectives
care, residential care or nursing care).	<p>In Mid Suffolk's Core Strategy (2012), Policy CS9 requires new housing developments to cater for different accommodation needs. However, as was the case with Babergh's Core Strategy, it does not specifically require the delivery of specialist housing. Despite this, Saved Policy H19 (Accommodation for special family needs) in the Mid Suffolk Local Plan (1998) encourages development for specialist needs.</p> <p>Without the JLP, it is likely that specialist housing would still be provided. However, the JLP provides an opportunity to specify how much specialist housing is needed and to place more of a requirement on developers to provide specialist housing.</p>	
There are high percentages of residents within Babergh District and Mid Suffolk District who live in rural areas, comprising 69% of Babergh's population and 75% of Mid Suffolk's population. Villages and rural areas tend to have less in the way of jobs, services and facilities than the market towns, and continue to lose services and facilities (e.g. shops and pubs).	<p>In Babergh's Core Strategy (2014), Policy CS2 (Settlement Pattern Policy) only permits development in the countryside in exceptional circumstances subject to a proven justifiable need. Likewise, Policy CS3 (Strategy for Growth and Development) only encourages development within the town/urban areas, Core and Hinterland Villages, as defined in the Settlement Hierarchy. Policy CS11 (Strategy for Development for Core and Hinterland Villages) sets out how development will be delivered in both the Core and Hinterland Villages. Policy CS20 (Rural Exception Sites) allows for development in more rural areas, as long as it is adjacent or well related to settlement development boundaries. Additionally, Policy CS17 (The Rural Economy) seeks to support the rural economy. Further to this, the Core Strategy encourages sustainable development through Policy CS15 (Implementing Sustainable Development in Babergh). Saved Policies SP05 (Farm Shops) and CR13 (Removal of Agricultural Occupancy Restrictions) in the Local Plan Alteration No. 2 document are also relevant.</p> <p>In Mid Suffolk's Core Strategy (2008), Policy CS1 (Settlement Hierarchy) states that the majority of development will be directed to towns and key service centres and in some cases, villages. However, development in the countryside will be restricted to particular types of development to support the rural economy, meet affordable housing and community need, and provide renewable energy. Policy CS2 (Development in the Countryside and Countryside Villages) sets out what development will be permitted within rural areas. Saved Policies H3 (Housing development in villages), H7 (Restricting housing development unrelated to needs of countryside), H8 (Replacement dwellings in the countryside), H9 (Conversion of rural buildings to dwellings), H10 (Dwellings for key agricultural workers), E10 (New Industrial and commercial development in the countryside), E11 (Re-use and adaption of agricultural and other rural buildings) in the Mid Suffolk Local Plan (1998) are also relevant.</p> <p>Without the JLP, it is likely that people would still continue to live in rural areas. The existing Local Plans for both Districts ensure that the rural economy is supported, whilst also directing development to more sustainable, urban locations in the existing plan period⁵². The new JLP provides an opportunity to ensure that those living within rural areas are supported by infrastructure, services and facilities, although it will continue to be a challenge to do so compared with more urban locations, due to lack of viability.</p>	SA Objectives 1, 3 and 14.
The number of people who have a Level 4 qualification (Degree, Higher Degree, NWQ Level 4-5, Higher National Certificate and Higher National Diploma) and above is lower than the national average, and although the number of people with no qualifications is equal to the national average at 25%, this could be improved.	<p>Babergh's Local Plan does not contain a policy relating to education and school provision as this tends to be achieved through the delivery of schools as part of large strategic sites.</p> <p>Policy CS6 (Services and Infrastructure) in Mid Suffolk's Core Strategy (2008) states that new development will be expected to provide or support the delivery of appropriate and accessible infrastructure to meet the justifiable needs of new development. Infrastructure contributions will be sought for education, libraries and social and community facilities. Saved Policy SC8 (Siting of new school buildings) in the Mid Suffolk Local Plan (1998) are also relevant.</p> <p>Without the JLP, schools may not be delivered to meet growing needs. The JLP offers an opportunity to ensure that large development sites make provision for a new educational facility, as well as ensuring that growing educational needs are also met in other ways (e.g. the provision of a library).</p>	SA Objective 2.

⁵² Babergh's most up-to-date document in the Local Plan, the Core Strategy, covers the period up to 2031, whilst Mid Suffolk's Core Strategy covers the period up to 2026.

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

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA Objectives
	new open green spaces to be planned and incorporated alongside new development.	

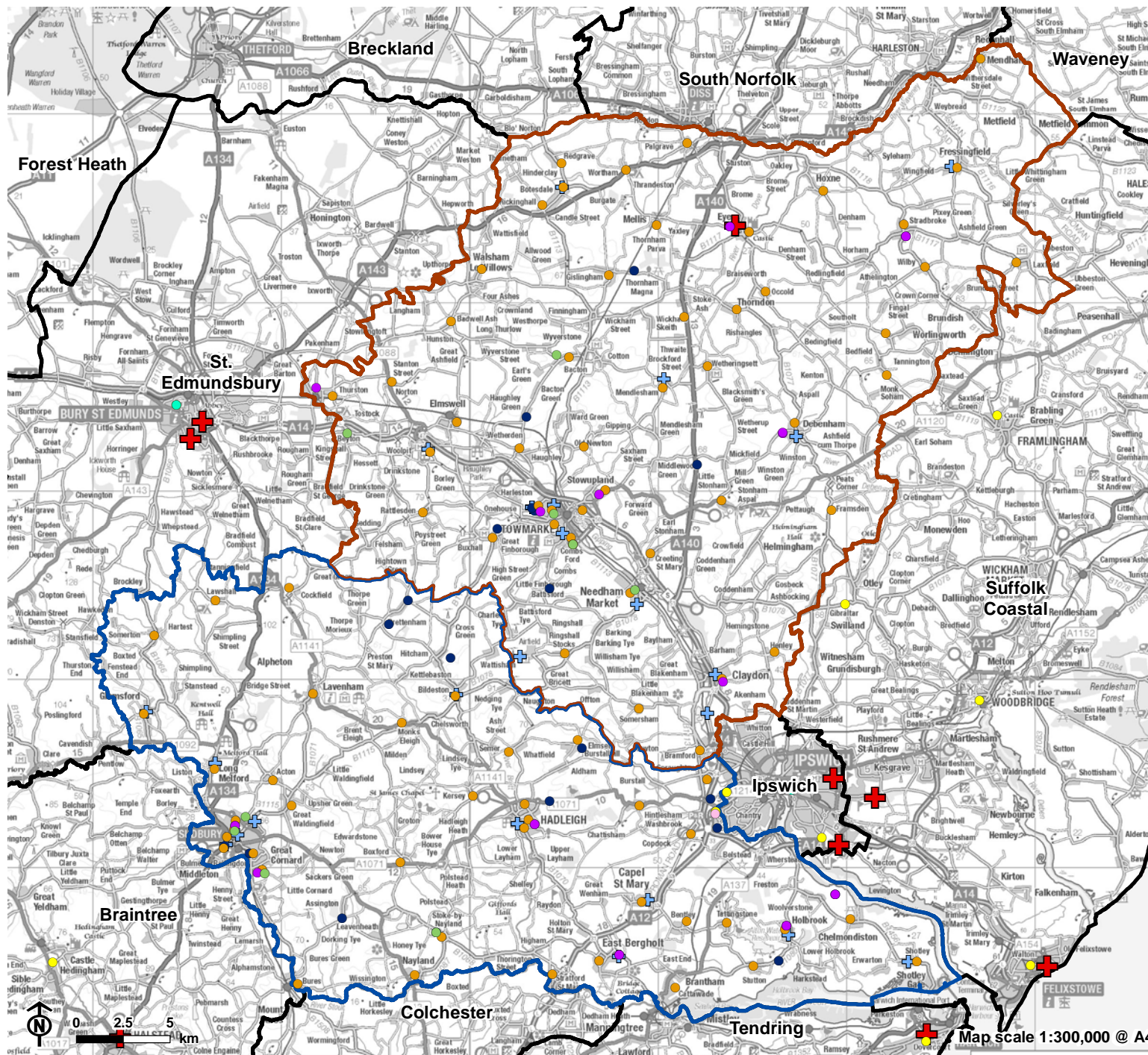


Figure 3.1: Education Facilities and Health Facilities

- Babergh District
- Mid Suffolk District
- Neighbouring local authority

- + GP practice
- + Hospital

Education facilities

- Primary
- Middle deemed secondary
- 16 Plus
- Secondary
- Further education
- Higher or university education
- Other

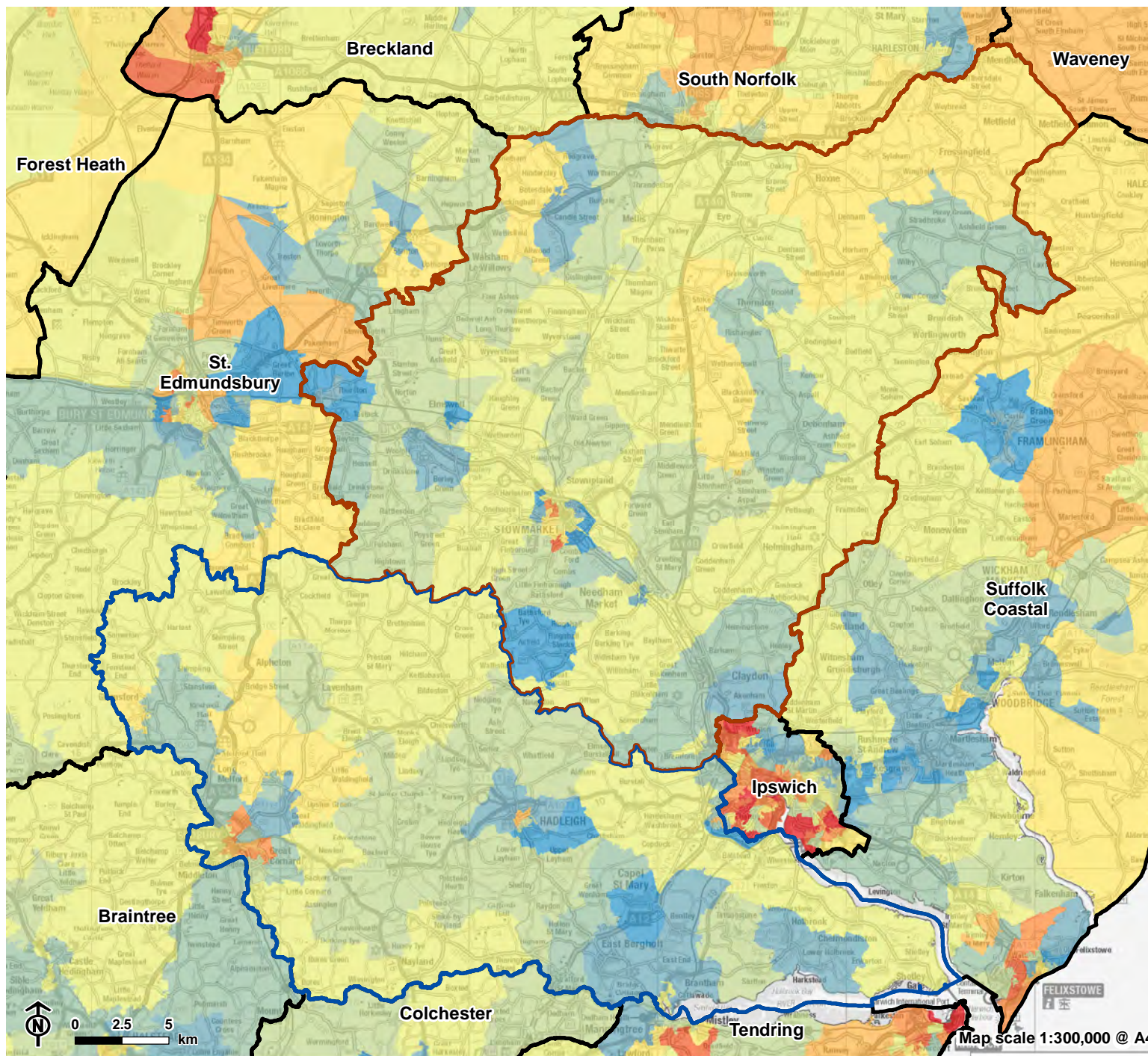
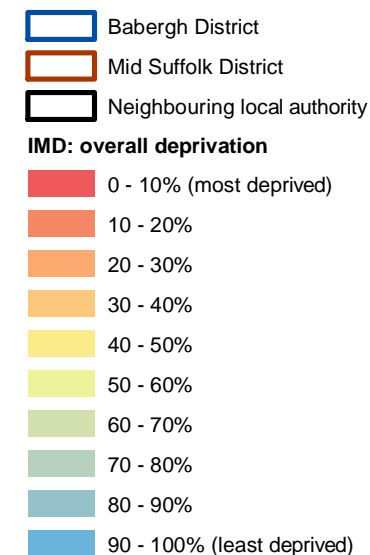


Figure 3.2: Indices of Multiple Deprivation (IMD)



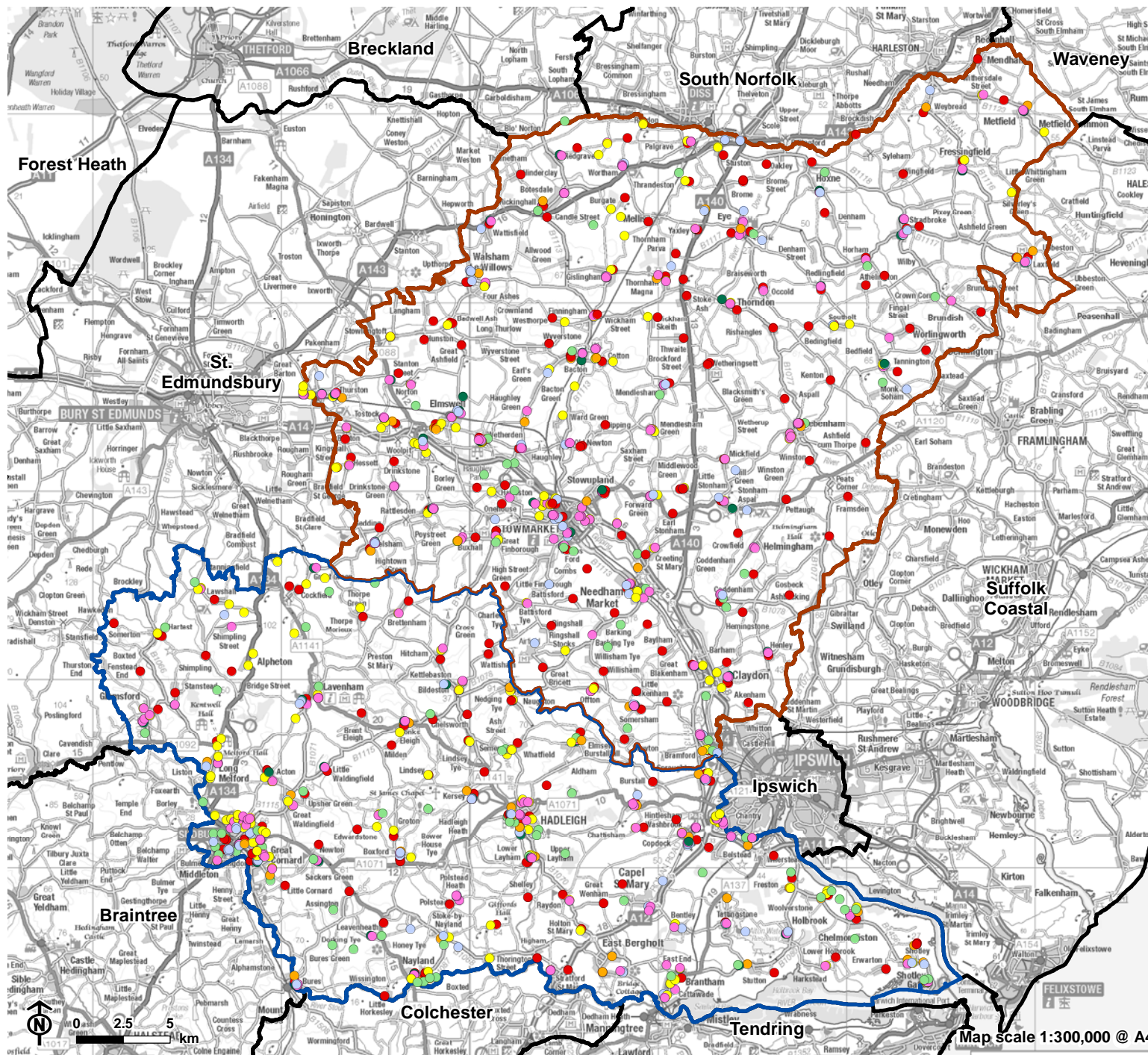


Figure 3.3: Open Space

- Babergh District
- Mid Suffolk District
- Neighbouring local authority

Open space

- Park and recreation ground
- Accessible natural green space
- Allotment
- Amenity greenspace
- Cemeteries and churchyard
- Provision for children and teenagers
- Outdoor sport or sports club

Chapter 4

Economy

Policy context

International

4.1 There are no specific international or European economic policy agreements relevant to the preparation of the JLP and the SA, although there are a large number of trading agreements, regulations and standards that set down the basis of trade within the European Union (although these are subject to change now that the UK has left the EU) and with other nations.

National

4.2 National Planning Policy Framework (NPPF)⁵³ sets out the following:

- The economic role of the planning system is to contribute towards building a “strong, responsive and competitive economy” by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. There is also a requirement for the planning system to identify and coordinate the provision of infrastructure.
- Planning policies should address the specific locational requirements of different sectors.
- Local planning authorities should incorporate planning policies which “support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation”.
- When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Sustainable growth and expansion of all types of business and enterprise in rural areas should be supported, both through conversion of existing buildings and well-designed new buildings.
- The NPPF requires Local Plans to “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other

⁵³ Ministry of Housing, Communities & Local Government (last updated 19 June 2019) National Planning Policy Framework:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf.

local policies for economic development and regeneration.”

4.3 National Planning Practice Guidance (PPG)⁵⁴:

Reiterates the importance for Local Plans to include a positive strategy for town centres to enable sustainable economic growth and provide a wide range of social and environmental benefits.

4.4 The Local Growth White Paper (2010)⁵⁵: Highlights the importance of economic policy that focusses on the delivery of strong, sustainable and balanced growth of income and employment over the long-term, growth which is broad-based industrially and geographically to provide equality of access and opportunity and build businesses that are competitive internationally.

4.5 Rural White Paper 2000 (Our Countryside: the future – A fair deal for rural England)⁵⁶: Sets out the Government's Rural Policy Objectives:

- To facilitate the development of dynamic, competitive and sustainable economies in the countryside, tackling poverty in rural areas.
- To maintain and stimulate communities and secure access to services which is equitable in all the circumstances, for those who live or work in the countryside.
- To conserve and enhance rural landscapes and the diversity and abundance of wildlife (including the habitats on which it depends).
- To promote government responsiveness to rural communities through better working together between central departments, local government, and government agencies and better co-operation with non-government bodies.

4.6 LEP Network Response to the Industrial Strategy

Green Paper Consultation (2017)⁵⁷: The aim of the document is to ensure that all relevant local action and investment is used in a way that maximises the impact it has across the Government's strategy. Consultation responses set out how the 38 Local Enterprise Partnerships (LEPs) will

work with Government using existing and additional resources to develop and implement a long-term Industrial Strategy.

Sub-national

4.7 Babergh & Mid Suffolk Town Centres & Retail Study

(2015)⁵⁸: Includes information regarding shopping habits, the assessment of retail and other town centre uses and health checks of the main towns. The study offers advice on the strengths and weaknesses of centres within the Districts and their ability to accommodate retail, leisure and other town centre uses, including the identification of potentially suitable centres. Advice is also given regarding the level and type of retail, leisure and other town centre uses that would be appropriate for the Districts considering national and local economic trends. The study provides recommendations of definitions retail related primary and secondary frontages, and primary shopping areas for the centres, as well as a hierarchy of town centres.

4.8 Babergh and Mid Suffolk Infrastructure Delivery Plan

(2019)⁵⁹: Aims to consider all infrastructure needs to enable sustainable development and growth supporting residents, businesses, communities, the environment and individuals. A key objective is prioritising investment into strategic services and infrastructure. The report also considers collaboration of organisations to provide funding and the phasing of infrastructure may occur depending on the degree of growth.

4.9 The Suffolk Coast Tourism Strategy (2013-2023)⁶⁰:

This has three principal elements which comprise the preparation of:

- An up-to-date visitor economic impact assessment ('Suffolk Coast & Heaths AONB Economic Impact Assessment').
- A survey and report on the visitor profiles, economic and experiential values of the three long distance walking routes ('Suffolk Coast Visitor Research').
- A visitor profiles assessment ('Suffolk Coast Destination Profile Assessment') and tourism strategy.

⁵⁴ Department for Communities and Local Government (2016) Planning Practice Guidance: <https://www.gov.uk/government/collections/planning-practice-guidance>.

⁵⁵ Department for Business, Innovation and Skills (2010) Local Growth: Realising Every Place's Potential: <https://www.gov.uk/government/publications/local-growth-realising-every-places-potential-hc-7961>.

⁵⁶ HM Government (2000) Rural White Paper (Our Countryside: the future – A fair deal for rural England): <http://www.tourisminsights.info/ONLINEPUB/DEFRA/DEFRA%20PDFS/RURAL%20WHITE%20PAPER%20-%20FULL%20REPORT.pdf>.

⁵⁷ LEP Network (2017) Response to the Industrial Strategy Green Paper Consultation: <https://www.lepnetwork.net/media/1470/lep-network-industrial-strategy-response-april-2017-final.pdf>.

⁵⁸ Carter Jonas (2015) Joint Town Centres & Retail Study: <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/29-10-15-BaberghMid-Suffolk-TCRSFinal-Report.Final-Version-29.10.15.pdf>.

⁵⁹ Babergh and Mid Suffolk (2019) Infrastructure Delivery Plan (2019-2036): <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/BMSDC-IDP-July-2019-.pdf>.

⁶⁰ URS (2013) The Suffolk Coast Tourism Strategy: <http://www.suffolkcoastandheaths.org/assets/Projects--Partnerships/BALANCE/TourismStrategy.pdf>.

Current baseline

Business sectors and employment

4.10 The Office for National Statistics found a growth rate of 5% in 2018 for businesses in the East of England, which is the third highest region in the UK⁶¹. Furthermore, 99.6% of registered businesses in the wider County of Suffolk are Small or Medium-Sized Enterprises (SMEs) with survival rates consistently better than the UK average⁶².

4.11 Babergh and Mid Suffolk Districts are made up mainly of rural areas with a range of market and smaller towns, along with some industrial and enterprise sites. Therefore, the Districts contain a range of businesses such as agriculture, construction, technology and retail. The table below shows the breakdown of business stock in the Districts, which is predominantly characterised by Business and Professional Services in Babergh, and construction work in both Districts.

Table 4.1: Business Stock by Sector in 2016⁶³

	Babergh		Mid Suffolk	
	Number of existing businesses		Number of existing businesses	
Agriculture	110	3%	220	6%
Business and Professional Services	1330	41%	1440	40%
Computing and Technology	110	3%	100	3%
Construction	420	13%	480	13%
Education	90	3%	100	3%
Energy, Waste and Utilities	20	1%	30	1%
Health and Care	200	6%	220	6%
Hospitality and Leisure	250	8%	210	6%
Manufacturing	230	7%	250	7%
Retail	250	8%	210	6%

	Babergh		Mid Suffolk	
	Number of existing businesses		Number of existing businesses	
Transport and Logistics	70	2%	120	3%
Wholesale	200	6%	240	7%
TOTAL	3280		3620	

4.12 Between October 2018 and September 2019, 76.1% (42,500) of residents in Babergh District were economically active compared to 86.7% (54,800) in Mid Suffolk. The regional average was 80.5% and the national average was 78.9%. In Babergh, 8.4% of the economically active residents were self-employed compared to 10.7% in Mid Suffolk. In 2018, 61.3% of total employees were full-time and 38.7% were part-time in Babergh, whilst 68.6% were full-time and 31.4% were part-time in Mid Suffolk. In addition, 2.9% (1,200) of Babergh residents were unemployed and 2.3% (1,300) of Mid Suffolk residents. This is lower than the regional (3%) and national averages (3.9%).

4.13 In 2019, gross weekly pay in Babergh was around £617.40 compared to £567.70 in Mid Suffolk. The regional average is £610.40 and the national average is £587. Therefore, although pay in Mid Suffolk is below the regional average, both Districts have higher than national average pay⁶⁴.

4.14 The table below shows that, in terms of numbers of jobs, the most significant occupations in the Districts are in manufacturing, wholesale and retail, accommodation and food service activities, professional scientific and technical activities, education, and human health and social work activities. In Mid Suffolk, administrative and support service activities are also an important source of employment.

Table 4.2: Employee Jobs by Industry⁶⁵

	Babergh		Mid Suffolk	
	Employee Jobs	%	Employee Jobs	%
Mining and Quarrying	0	0	20	0.2

⁶¹ Office for National Statistics (2018) Business Demography UK 2018: <https://www.ons.gov.uk/businessindustryandtrade/business/activitysizeandlocation/bulletins/businessdemography/2018#which-regions-have-the-highest-business-births-and-deaths>.

⁶² BMSDC (n.d.) Open for Business Strategy: Where and how do the District Councils make a difference: <https://www.midsuffolk.gov.uk/assets/Economic-Development/OpenForBusiness-Strategy-with-links.pdf>.

⁶³ Lichfields (2017) Ipswich Economic Area Sector Needs Assessment: <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Ipswich-Economic-Area-Sector-Needs-Assessment-Sept-2017.pdf>.

⁶⁴ Office for National Statistics (2019) Labour Market Profile for Babergh and Mid Suffolk, both separate webpages: <https://www.nomisweb.co.uk/reports/lmp/la/1946157239/report.aspx?town=babergh#tabearn>;

<https://www.nomisweb.co.uk/reports/lmp/la/1946157242/report.aspx?town=mid%20suffolk#tabearn>.

⁶⁵ NOMIS (2018) Employee Jobs by Industry: <https://www.nomisweb.co.uk/reports/lmp/la/1946157239/report.aspx?town=Babergh#tabempunemp>.

	Babergh		Mid Suffolk	
	Employee Jobs	%	Employee Jobs	%
Manufacturing	5,000	16.1	5,000	8.1
Electricity, Gas, Steam and Air Conditioning Supply	15	0	75	0.5
Water Supply; Sewerage, Waste Management and Remediation Activities	450	1.5	450	0.7
Construction	1,500	4.8	4,000	4.7
Wholesale and Retail Trade; Repair of Motor Vehicles And Motorcycles	6,000	19.4	6,000	15.2
Transportation and Storage	1,000	3.2	2,500	4.8
Accommodation and Food Service Activities	2,500	8.1	1,750	7.6
Information and Communication	700	2.3	700	4.2
Financial and Insurance Activities	400	1.3	400	3.5
Real Estate Activities	350	1.1	300	1.7
Professional Scientific And Technical Activities	2,500	8.1	2,500	8.7
Administrative and Support Service Activities	1,500	4.8	2,000	9.1
Public Administration and Defence; Compulsory Social Security	250	0.8	700	4.3
Education	3,000	9.7	3,000	8.9

	Babergh		Mid Suffolk	
	Employee Jobs	%	Employee Jobs	%
Human Health and Social Work Activities	3,000	9.7	4,000	13.2
Arts, Entertainment and Recreation	800	2.6	800	2.5
Other Services Activities	450	1.5	600	2.0

Economic growth challenges and priorities

4.15 Babergh and Mid Suffolk released an "Open for Business Strategy" in 2018 which communicates the Districts' approach in supporting economic growth and helping businesses, communities and their broad network of partners. The report aims to encourage collaboration when tackling both short-term and long-term aspirations.

4.16 The priority in Babergh is to "shape, influence and provide the leadership to enable growth while protecting and enhancing our environment". In Mid Suffolk, the priority is to "lead and shape the local economy by promoting and helping to deliver sustainable economic growth, which is balanced with respect for wildlife, heritage and the natural and built environment".

4.17 A Local Enterprise Partnership for Norfolk and Suffolk, New Anglia, has 10 enterprise zones, 2 of which are in Babergh and Mid Suffolk⁶⁶. These are Stowmarket Enterprise Park, Mill Lane and Sroughton Enterprise Park, Sroughton. A Food Enterprise Zone known as Jimmy's Farm site is also present within BMSDC.

4.18 The main employment sites and enterprise zones are shown in **Figure 4.1**.

4.19 The main issues impacting on growth in Babergh and Mid Suffolk are as follows⁶⁷:

- Several large local strategic sites (including designated Enterprise Zone sites) have potential for significant job generation but need support, such as the development of infrastructure, services and utilities.
- Limited premises options for SMEs, including starter, incubator, clustering businesses and then scaling-up 'graduation' space.

⁶⁶ BMSDC (n.d.) Enterprise Zones: <https://www.babergh.gov.uk/business/economic-development/space-to-innovate-enterprise-zones/>.

⁶⁷ BMSDC (n.d.) Open for Business Strategy: Where and how do the District Councils make a difference: <https://www.babergh.gov.uk/assets/Economic-Development/OpenForBusiness-Strategy-with-links.pdf>.

- Slow broadband speeds and limited mobile coverage in rural areas.
- Lower skills and educational attainment than regional or national averages.
- High levels of outward commuting partially due to the imbalance of housing and jobs.
- Low levels of entrepreneurship and business start-up, but all also fewer business failures.
- Market towns that need help improving their vitality, so the towns become designation areas and play to their strengths.
- Limited access to higher education and adult learning services and support across the wider area however, this is improving.
- Limited rural infrastructure, particularly road and digital networks, as well as access to skilled individuals with specialist and higher-level skills or leadership affect the ability to recruit young people.
- Place of interest that have inherent barriers to growth and development, such as Areas of Outstanding Natural Beauty (AONB) or Sites of Special Scientific Interest (SSSI).

Town centres and retail

4.20 The current Town Centre and Retail Study for Babergh and Mid Suffolk was published in September 2015. According to the study, there has been a decline in shopping centre consumer patterns.

4.21 BMSDC have been collecting data on shop occupancy and vacancy rates in their key towns and service centres for some years. The results are set out in the below table and shows highest vacancy rates to be in Needham Market, followed by Sudbury.

Table 4.3: Town Centre Vacancy Rates

Town Centre	No. of Shops			Floorspace (m ²)		
	Total	Vacant	% vacant	Total	Vacant	% vacant
Sudbury (2019)	260	19	7.31%	42,899	2,996	6.98%
Hadleigh (2019)	114	5	4.39%	23,129.5	438	1.89%
Stowmarket (2019)	47	0	0%	8,117.7	112	0%
Needham Market (2019)	79	8	10.13%	8,117.7	112	0%

Key sustainability issues

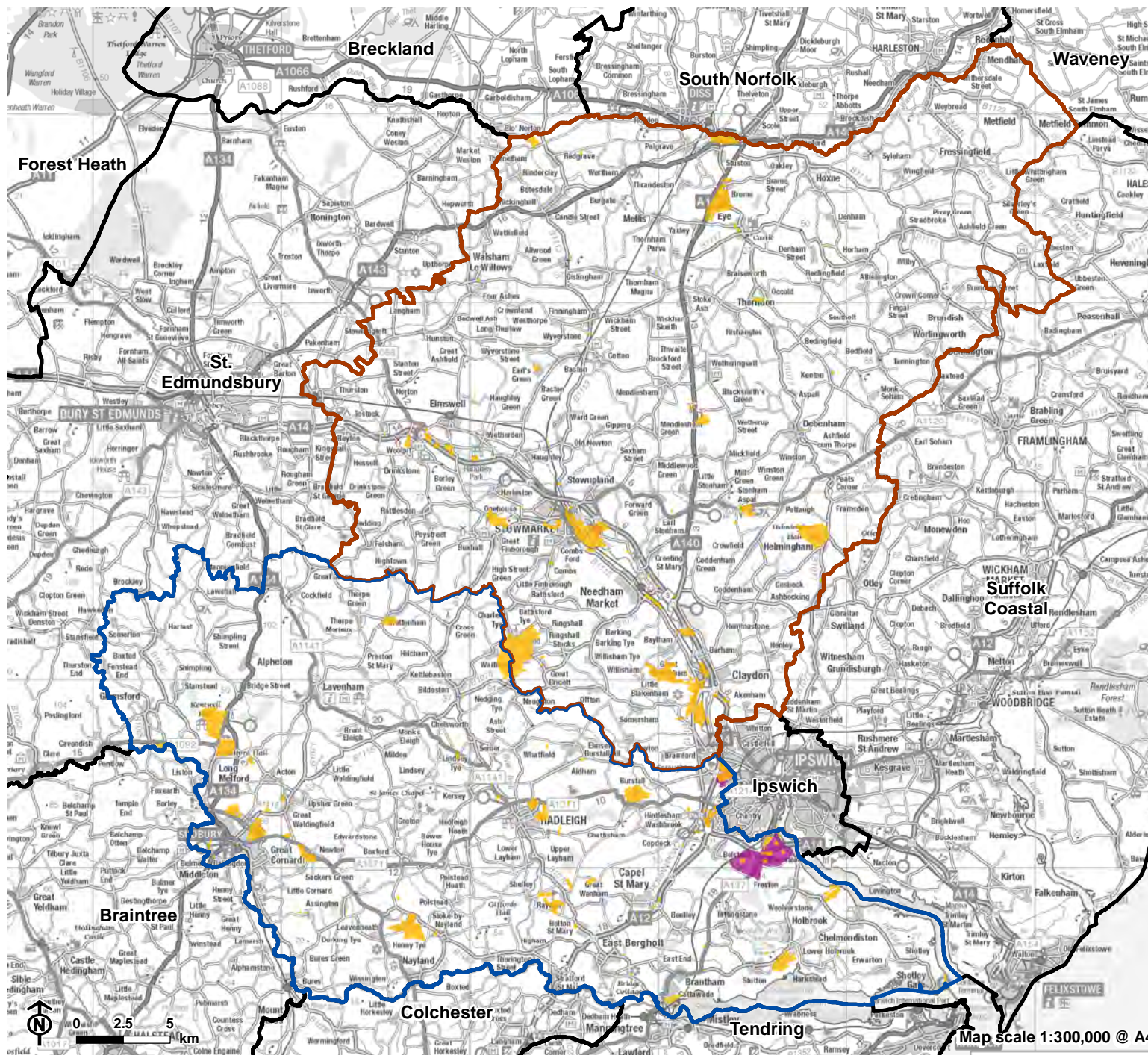
4.22 The key sustainability issues for the economy, and their likely evolution without the JLP are shown in **Table 4.4**.

Table 4.4: Key sustainability issues and likely evolution without the Joint Local Plan

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA Objectives
There are a number of barriers to economic growth within BMSDC, including educational attainment and a lack of suitable premises for SMEs.	<p>Policy CS3 (Strategy for Growth and Development) in Babergh's Core Strategy (2014) states that in order to support and encourage economic growth and employment opportunities, and to ensure that a continuous range and diversity of sites and premises are available across the District through the plan period, existing employment sites will be regularly reviewed and where appropriate, protected. A small number of sites are also allocated for employment development in the Core Strategy. Saved Policies EM02 (General Employment Areas – Existing and New allocations), EM08 (Warehousing & Distribution), SD01 (Principal Shopping Area), SD02 (Mixed Use Areas – Business & Service), SD03 (Mixed Use Areas – Shopping & Commerce), SD11 (Industrial Areas) in the Babergh Local Plan Alteration No. 2 (2006) are also relevant.</p> <p>Policy FC3 in Mid Suffolk's Core Strategy Focused Review (2012) document states that provision will be made for development that aims to deliver at least 8,000</p>	SA Objectives 1, 2, 14 and 15.

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA Objectives
	<p>additional jobs in the District by 2026 and an indicative 11,100 jobs by 2031. To help meet this target and contribute to an overall package of sustainable development for Stowmarket, a new site will be allocated in Stowmarket at Mill Lane. Saved Policies E1-E10, S1-S3, S6-S7 and S10-S13 in the Mid Suffolk Local Plan (1998) are also relevant.</p> <p>Without the JLP, it is uncertain how the job market might change but to some degree, change is inevitable given the UK's exit from the EU. The new Joint Local Plan offers the opportunity to create and safeguard jobs through the allocation and promotion of employment generating uses including office and industrial spaces and the promotion of the rural economy, as well as promoting access and opportunity for all.</p>	
There has been a decline in shopping consumer patterns, with a number of vacant units present in key towns and service centres.	<p>Policy CS16 (Town, Village and Local Centres) in Babergh's Core Strategy (2014) states that retail development will continue to be focussed in Sudbury and Hadleigh, and in village and local centres where appropriate. More specifically, the Council will make provision for up to 11,000 square metres of comparison retail goods in 2021 in Sudbury. Saved Policy SD03 (Mixed Use Areas – Shopping & Commerce) in the Babergh Local Plan Alteration No. 2 (2006) is also relevant.</p> <p>Saved Policies S1 (Supporting the role of existing town centres), S2 (Uses appropriate to principal shopping areas) and S3 (Amusement Centres) in the Mid Suffolk Local Plan (1998) are relevant. However, the Core Strategy (2008) does not contain a policy for retail development.</p> <p>Without the JLP, vacancy rates in the key towns and service centres may continue to increase. However, the number of vacant units is partly due to the increase in online sales, which is a nationally significant change in shopping behaviours. The JLP presents an opportunity to protect and promote the High Street in the key towns and service centres.</p>	SA Objectives 14 and 15.
Babergh is not identified as a known destination for business growth, partly because of its geographical location between Ipswich, Colchester and Bury St Edmunds.	<p>Babergh's Core Strategy (2014) allocates a small number of sites for employment development and also states that existing employment sites will be regularly reviewed and where appropriate, protected. Saved Policies EM01 (General Employment), EM02 (General Employment Areas – Existing and New allocations), EM08 (Warehousing & Distribution), SD01 (Principal Shopping Area), SD02 (Mixed Use Areas – Business & Service), SD03 (Mixed Use Areas – Shopping & Commerce), SD11 (Industrial Areas) in the Babergh Local Plan Alteration No. 2 (2006) are also relevant.</p> <p>Policy FC3 in Mid Suffolk's Core Strategy Focused Review (2012) makes provision for significant employment development and to help meet this target, a new site will be allocated in Stowmarket at Mill Lane. Saved Policies E1-E10, S1-S3, S6-S7 and S10-S13 in the Mid Suffolk Local Plan (1998) are also relevant.</p> <p>Without the JLP, it is likely that Babergh will continue to not be identified as a destination for business growth. The new JLP presents an opportunity to develop Babergh's reputation as a business growth destination and provide employment development where needed, although it will continue to face competition from other areas with more established reputations, networks and infrastructure.</p>	SA Objectives 14 and 15.
There is an uneven distribution of services throughout BMSDC and limited infrastructure in place to support economic development.	<p>Babergh's Core Strategy (2014) allocates a small number of sites for employment development and also states that existing employment sites will be regularly reviewed and where appropriate, protected. With regard to infrastructure, Policy CS21 (Infrastructure Provision) states that the District will develop sustainable places in the District and proposals for commercial development will be supported by, and make adequate provision for, appropriate infrastructure. Saved Policies EM02 (General Employment Areas – Existing and New allocations), EM08 (Warehousing & Distribution), SD01 (Principal Shopping Area), SD02 (Mixed Use Areas – Business & Service), SD03 (Mixed Use Areas – Shopping & Commerce), SD11 (Industrial Areas) in the Babergh Local Plan Alteration No. 2 (2006) are also relevant.</p> <p>Policy FC3 in Mid Suffolk's Core Strategy Focused Review (2012) makes provision for significant employment development and to help meet this target, a new site will be allocated in Stowmarket at Mill Lane. The policy states that major new allocations of employment land should be situated primarily in or close to towns and Key Service Centres with good access to the District's major transport routes and good</p>	SA Objectives 2, 14, 15 and 16.

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA Objectives
	<p>access by public transport. Saved Policies E1-E10, S1-S3, S6-S7 and S10-S13 in the Mid Suffolk Local Plan (1998) are also relevant.</p> <p>Without the JLP, limited additional infrastructure to support economic development will be in place. The new JLP offers an opportunity to address infrastructure issues across BMSDC and therefore to support economic development.</p>	



**Figure 4.1: Employment Sites and
Enterprise Zones**

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- Employment Site
- Enterprise Zone

Chapter 5 Transport, Air Quality and Noise

Policy context

International

5.1 The Trans-European Networks (TEN)⁶⁸: Created by the European Union by Articles 154-156 of the Treaty of Rome (1957), with the stated goals of the creation of an internal market and the reinforcement of economic and social cohesion. These include the Trans-European Transport Networks (TEN-T), which includes High Speed 1, and the Trans-European Telecommunications Networks (eTEN).

5.2 European Air Quality Framework Directive (1996) and Air Quality Directive (2008)⁶⁹: Put in place measures for the avoidance, prevention, and reduction in harmful effects to human health and the environment associated with ambient air pollution and establish legally binding limits for the most common and harmful sources of air pollution.

National

5.3 National Planning Policy Framework (NPPF)⁷⁰: Encourages local planning authorities to consider transport issues from the earliest stages of plan making so that: opportunities to promote sustainable transport are identified and pursued; the environmental impacts of traffic and transport infrastructure can be identified and assessed; and opportunities from existing or proposed transport infrastructure and changing transport technology and usage are realised. The framework also states that the planning system should actively manage growth patterns in support of these objectives.

5.4 National Planning Practice Guidance (PPG)⁷¹: Reiterates the requirement for local planning authorities to undertake an assessment of the transport implications of reviewing their Local Plan.

5.5 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland⁷²: Sets out a way forward for work and planning on air quality issues by setting out the air

⁶⁸ European Commission (2019) Trans-European Networks – Guidelines: http://www.europarl.europa.eu/ftu/pdf/en/FTU_3.5.1.pdf.

⁶⁹ European Commission (2008) Directives: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32008L0050&from=EN>.

⁷⁰ Ministry of Housing, Communities & Local Government (last updated 19 June 2019) National Planning Policy Framework: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf.

⁷¹ Ministry of Housing, Communities & Local Government (last updated 1 October 2019) Planning Practice Guidance:

<https://www.gov.uk/government/collections/planning-practice-guidance>.

⁷² Department for Environment Food and Rural Affairs (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf.

quality standards and objectives to be achieved. It introduces a new policy framework for tackling fine particles and identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives. The objectives of the Strategy are to:

- Further improve air quality in the UK from today and long term.
- Provide benefits to health quality of life and the environment.

5.6 Department for Transport, The Road to Zero (2018)⁷³:

Sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

5.7 A Green Future: Our 25 Year Plan to Improve the Environment⁷⁴:

Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. The area of relevance to this chapter is: increasing resource efficiency and reducing pollution and waste. Actions that will be taken as part of this key areas are as follows:

- Increasing resource efficiency and reducing pollution and waste:
 - Reduce pollution by tackling air pollution in our Clean Air Strategy and reduce the impact of chemicals.

5.8 UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations⁷⁵:

Sets out the Government's ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra-low emission vehicles (ULEVs), a £290 million National Productivity Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help local authorities to prepare Air

Quality Action Plans and improve air quality, an £89 million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

5.9 Clean Air Strategy 2019⁷⁶: Sets out the comprehensive action that is required from across all parts of government and society to meet these goals. This will be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will support the creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms. The UK has set stringent targets to cut emissions by 2020 and 2030.

Sub-national

5.10 Suffolk's Local Transport Plan 2011-2031⁷⁷: is a two-part plan. The first part sets out the 20-year strategy that highlights the Council's long-term ambitions for transport and the second part is a four year implementation plan demonstrating how the Council will address the issues identified in the longer-term transport strategy.

5.11 Babergh and Mid Suffolk Infrastructure Delivery Plan (2019)⁷⁸: This aims to consider all infrastructure needs to enable sustainable development and growth supporting residents, businesses, communities, the environment and individuals. A key objective is prioritising investment into strategic services and infrastructure. The report also considers collaboration of organisations to provide funding and the phasing of infrastructure may occur depending on the degree of growth.

5.12 Suffolk Travel Plan Guidance (2019)⁷⁹: promotes best practice in travel planning and consistency across Suffolk in support of national and local policy requirements. The guidance provides clarity to both stakeholders and developers involved in the planning process.

5.13 Suffolk Cycling Strategy (2014-2031)⁸⁰: Reviews Suffolk's cycling landscape, sets 6 key strategies and outlines actions to help meet these strategies to achieve proposed

⁷³ Department for Transport (2018) The Road to Zero: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf.

⁷⁴ HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf.

⁷⁵ Department for Environment Food and Rural Affairs and Department for Transport (2017) UK plan for tackling roadside nitrogen dioxide concentrations: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-plan-overview.pdf.

⁷⁶ DEFRA (2019) Clean Air Strategy 2019: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf.

⁷⁷ Suffolk County Council (2019) Suffolk Local Transport Plan: <https://www.suffolk.gov.uk/roads-and-transport/transport-planning/transport-planning-strategy-and-plans/>.

⁷⁸ BMSDC (2019) Infrastructure Delivery Plan (2019-2036): <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/BMSDC-IDP-July-2019-.pdf>.

⁷⁹ Suffolk County Council (n.d.) Suffolk Travel Plan Guidance: <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/Local-Links/26444-Suffolk-Travel-Plan-Guidance-V5-Web-Version-LR.pdf>.

⁸⁰ Suffolk County Council (2014) Suffolk Cycling Strategy (2014-2031): <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-and-development-advice/20140619-Cycling-Strategy-booklet.pdf>.

outcomes. The report also outlines the delivery approach and governance of the strategy.

5.14 Suffolk Walking Strategy (2015-2020)⁸¹: The aim of the strategy is to get more people to walk in Suffolk and walking should be a 'default' choice for journeys of 20 minutes walking time or less. The report sets out aims, actions and outcomes. The report also outlines the delivery approach and governance of the strategy.

Current baseline

5.15 The transport network of Babergh and Mid Suffolk is shown in **Figure 5.3**.

Road network

5.16 The key components of the road network of Babergh and Mid Suffolk are:

- The A14, which is an important corridor for moving goods as it connects the port of Felixstowe with the Midlands and the A1, via Ipswich, Bury St Edmunds, Cambridge, and Huntingdon. Stowmarket and Needham Market are located just to the south of this route, which acts as a bypass to these two towns.
- The A12, which connects London with Chelmsford, Colchester and Ipswich and on to the coastal towns of Lowestoft and Great Yarmouth. The A12 passes through the south eastern part of Babergh but does not connect into any of the market towns in the District.
- The A140, which connects the A14 just north of Ipswich with Norwich via Diss. Eye is located just to the east of this route.
- The A134, which connects Colchester and Braintree (the latter via the A131) with Bury St Edmunds, via Sudbury.

5.17 Hadleigh does not lie on the strategic road network, although it is on the A1071, which links Sudbury with Ipswich, and the A1141 to Bury St Edmunds. In addition, the A1120 links Stowmarket and Needham Market with the A12 to the east as a cross-country route rather than going via the A14 around Ipswich.

5.18 The remainder of the road network in the two Districts comprises primarily B roads and rural roads.

Traffic growth and road projects

5.19 A recent modelling report⁸² tested the Council's core set of development assumptions across the District made in the

Local Plan. The modelling shows future traffic growth for 2026 and 2036, as a result of changing patterns of travel behaviour and predicting future traffic impacts. The growth assumptions for the modelling consider population growth and specific development locations, as well as car ownership and relative vehicle operating costs.

5.20 The results show that whilst many junctions may be close to or exceed capacity in 2026 and 2036, there are also many parts of the network that will operate well within their theoretical capacity. For junctions where the volume to capacity (V/C) is shown to approach or exceed operational capacity, the individual development proposals assessed within the model would, as part of their planning applications, need to consider additional measures to help mitigate any impact.

5.21 In Babergh District and to the south-west of Ipswich, the Beagle roundabout (A1071/B1113/Swan Hill) is shown to have overall capacity issues, with multiple arms over-capacity in both 2026 and 2036. The A1071/Hadleigh Road signalised junction is highlighted as having capacity issues in both forecast years. Sudbury is shown to generally operate within capacity within the town itself in both forecast years. However, the southern A131 approach to/from Sudbury and A134/A1071 junction shows capacity issues in both forecast years, going over capacity in 2036. Brantham is shown to have capacity issues in both forecast years, with the A137 over capacity in both forecast years.

5.22 In Mid Suffolk District, the A140 corridor is shown to have capacity issues at multiple locations including the A140/A1120 staggered crossroads and A140/Workhouse Road/Stoke Road junction. Stowmarket is shown to generally operate within capacity in both forecast years, though isolated link approaches to Gipping Way and Ipswich Road are shown to have capacity issues in both forecast years.

5.23 The highway schemes outlined below are due to be in place in BMSDC by 2026 and 2036, which will help reduce congestion across both Districts:

- **Chilton Woods access road**: access road between A134 Springlands Way (new roundabout) and Acton Lane (new priority junction).
- **A1071/Swan Hill roundabout**: capacity improvements.
- **A1071/Hadleigh Road signals**: capacity improvements.
- **A1071/Poplar Lane**: signalisation as part of access arrangements for Wolsey Grange.

⁸¹ Suffolk County Council Suffolk Walking Strategy (2015) Active for Life: Suffolk Walking Strategy 2015-2020: https://www.healthysuffolk.org.uk/uploads/Suffolk's_Walking_Strategy.pdf.

⁸² WSP (2020) Ipswich Strategic Planning Area Local Plan Modelling: <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Transport-Modelling/2020/200115-ISPA-MR7-SCC-Hwy-Results-Report.pdf>.

- **A1214 London Road:** new signalised junction part of access arrangements for Wolsey Grange.
- **A140 Eye Airfield:** roundabout improvements.

Public transport network

5.24 Public transport is limited in the Districts. However, there are buses and trains that operate. Suffolk County Council has a bus and train network map which shows all possible routes⁸³.

5.25 In Babergh, trains go from Sudbury out of the District to Marks Tey. Marks Tey railway station is on the Great Eastern Main Line and is a junction for the Sudbury Branch Line to Sudbury. You can change at Marks Tey to go to London Liverpool Street. Trains can also be taken from Ipswich railway station into London Liverpool Street.

5.26 In Mid Suffolk, trains go from Ipswich to Needham Market, Stowmarket, Elmswell, Thurston and Diss, and on to either Norwich or Bury St Edmunds and Cambridge. Direct trains to London are limited to Stowmarket only.

5.27 There are also bus services which provide a range of routes and connect the main towns, villages and centres within the Districts. However, these services are often irregular and limited⁸⁴.

5.28 The Councils support a "Connecting Communities" initiative that collects residents from their homes and connects them with appropriate bus or train⁸⁵.

Commuting patterns and travel behaviour

5.29 The Districts' residents rely heavily on cars to get around and access employment, education, amenities and services, partly as a result of living in more isolated rural areas. There are many different commuting routes within the Districts and individuals commute in and out of the Districts from surrounding areas.

5.30 Many residents that live in Mid Suffolk commute into Ipswich. Residents from all over Babergh and Mid Suffolk, including Ipswich Town commute, into London⁸⁶.

5.31 As set out in **Figure 5.1**, around 11,622 individuals commute into Babergh District, whilst 18,162 commute out of the District. Therefore, overall, there are 6,540 less people in Babergh District as a result of commuting⁸⁷. The commuting figures show the strong relationship that Babergh has with

Ipswich in particular, both for commuting inwards and outwards.

5.32 According to **Figure 5.2**, Mid Suffolk is similar with 13,961 individuals commuting into the District and 20,834 commuting out of the District. Overall, there are 6,873 less individuals in Mid Suffolk District as a result of commuting⁸⁸. Mid Suffolk also has a strong relationship with Ipswich, but the District to which most people commute is St Edmundsbury (which contains Bury St Edmunds).

5.33 Whilst there is commuting between Babergh and Mid Suffolk, the overall numbers of journeys are not as high as they are between the two Districts and Ipswich and St Edmundsbury.

⁸³ Suffolk County Council (2020) Public Transport Map: <https://www.suffolkonboard.com/buses/timetables/>.

⁸⁴ Suffolk County Council (2020) Bus timetables: <https://www.suffolkonboard.com/buses/timetables/>.

⁸⁵ Suffolk County Council (2020) Connecting Communities: <https://communities.suffolkonboard.com/my-area/mid-suffolk/>.

⁸⁶ DataShine Commute (2011): <https://commute.datashine.org.uk/#mode=train&direction=both&msoa=E02004447&zoom=11&lon=0.8279&lat=52.0588>.

⁸⁷ NOMIS (2011) Location of usual residence and place of work by sex: <https://www.nomisweb.co.uk/census/2011/wu01uk/chart>.

⁸⁸ NOMIS (2011) Location of usual residence and place of work by sex: <https://www.nomisweb.co.uk/census/2011/wu01uk/chart>.

Figure 5.1: Location of usual residence and place of work in Babergh⁸⁹

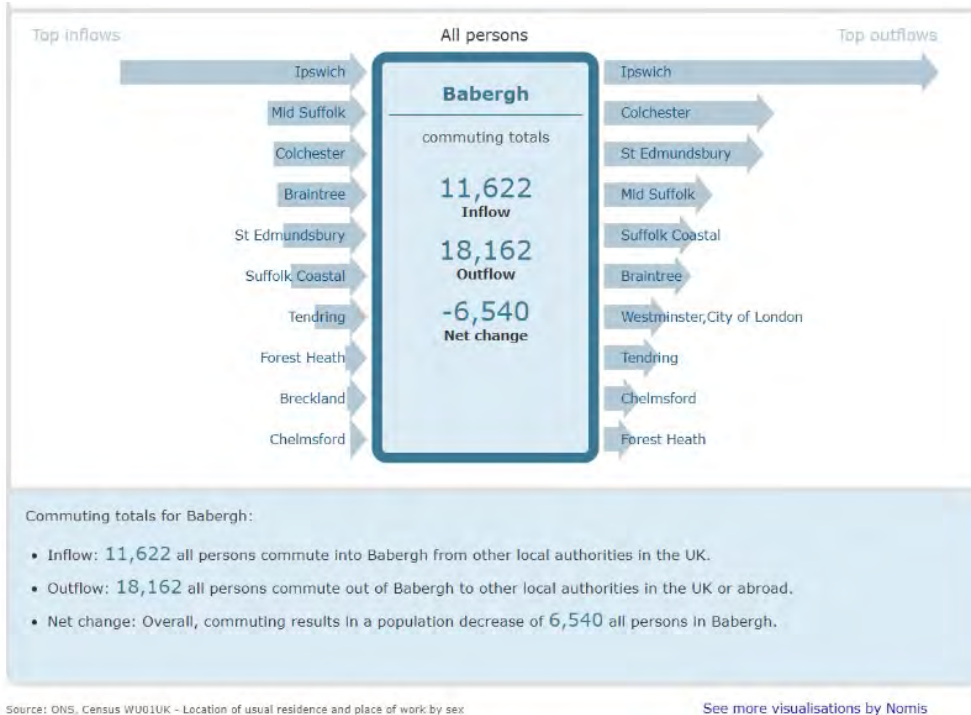
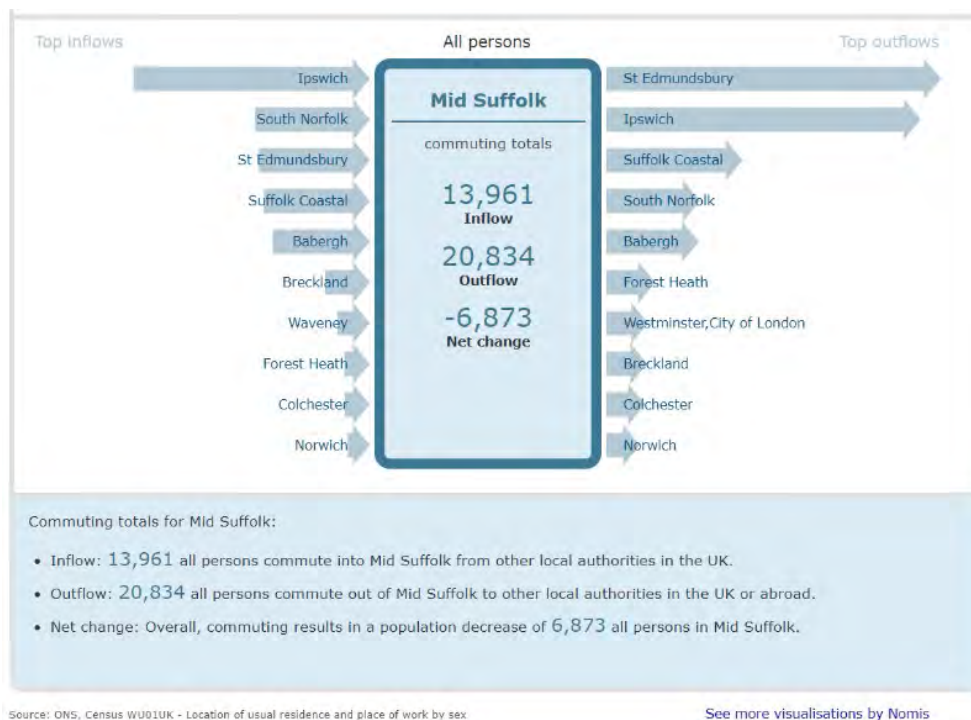


Figure 5.2: Location of usual residence and place of work in Mid Suffolk⁹⁰



⁸⁹ NOMIS (2011) Location of usual residence and place of work by sex: <https://www.nomisweb.co.uk/census/2011/wu01uk/chart>.

⁹⁰ NOMIS (2011) Location of usual residence and place of work by sex: <https://www.nomisweb.co.uk/census/2011/wu01uk/chart>.

Air quality and noise

Air quality

5.34 Industrial activity in the Districts has very few large industrial processes and is therefore light in nature meaning it has relatively little impact on air quality. In 2018, there were no new sources of significant industrial emissions in the Districts and a number of small planning applications were assessed for air quality purposes.

5.35 The most significant source of air pollution is from transport. Air quality is tested annually throughout the Districts. The main pollutant of concern is Nitrogen Dioxide which comes from road traffic emissions and monitoring has been conducted to measure concentrations.

5.36 In Babergh District, results found that Cross Street, Sudbury had concentrations of Nitrogen Dioxide that are higher than the health based annual mean Air Quality Objective. As a result, an Air Quality Management Area (AQMA) was designated in 2008 in this area. In 2018, the three monitoring locations in the AQMA exceeded the Objective for the last 5 years. The main roads within the Districts (A12, A14 and A140) and the railway between London and Norwich have not been found to have significant poor air quality.

5.37 Due to the high levels of Nitrogen Dioxide in Cross Street, an Air Quality Action Plan has been produced which will help reduce the concentration of Nitrogen Dioxide. There are two parking bays along the street which allow vehicles to park and when either bay is occupied cars have to slow down to allow cars to pass on the other side and often a queue builds up. Queuing and accelerating lead to an increase in concentrations of Nitrogen Dioxide. Babergh District has been working with Suffolk County Council Highways Department to pursue experimental removal of on-street parking bays and

was predicted to start in early 2020. In Mid Suffolk, monitoring has not historically shown exceedances of the Objective at exposure locations, (e.g. schools, hospitals, care homes and residential properties) and there are no designated AQMAs.

5.38 In surrounding Districts, five AQMAs have been designated in Ipswich, all because of Nitrogen Dioxide levels.

5.39 **Figures 5.4 to 5.6:** show air quality in the two Districts and surrounding areas, and where AQMAs have been designated for Nitrogen Dioxide pollution. These clearly show that air pollution follows the main road transport corridors, with concentrations in the urban areas, even though pollution thresholds are not exceeded in most locations.

Noise

5.40 Noise is a common problem arising from transport, and studies have shown it can have major negative direct and indirect effects on health and well-being, on quality of life and on wildlife. Exposure to noise can increase stress levels, disrupt communications and disturb sleep. There is scope for transport's noise emissions to be reduced, by cutting the number of cars on the road, low-noise road surfacing, noise barriers, and many other measures.

5.41 Noise pollution is not a major issue in Babergh and Mid Suffolk, and again tends to be associated with the main transport corridors as shown in **Figure 5.7**.

Key sustainability issues

5.42 The key sustainability issues for transport and well-being, and their likely evolution without the JLP are shown in **Table 5.1**.

Table 5.1: Key sustainability issues and likely evolution without the Joint Local Plan

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA Objectives
Both Babergh and Mid Suffolk benefit from some form of public transport provision. However, due to the Districts being predominantly rural, a lot of residents are dependent on the private car.	<p>Policy CS21 (Infrastructure Provision) in Babergh's Core Strategy (2014) states that all proposals for housing and commercial development will be required to be supported by, and make provision for, appropriate infrastructure. Saved Policies TP04-TP19 in the Babergh Local Plan Alteration No. 2 (2006) are also relevant.</p> <p>Policy CS6 (Services and Infrastructure) in Mid Suffolk's Core Strategy (2008) states that new development will be expected to provide or support the delivery of appropriate and accessible infrastructure to meet the justifiable needs of new development. Local priorities for which infrastructure contributions may be sought include transport infrastructure, improvements in public transport and improvements to pedestrian and cycle routes. Saved Policies T2-T14 in the Mid Suffolk Local Plan (1998) are also relevant.</p> <p>Without the JLP, it is likely that dependence on the private car will continue, especially as a result of cuts to public transport. The JLP presents an opportunity to</p>	SA Objectives 6 and 16.

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA Objectives
	further address the issue of car dependency. This can be achieved by promoting sustainable and active transport, sustainable development locations, and integrating new and more sustainable technologies, as new development is to be provided in BMSDC.	
Capacity issues have been identified at various junctions within BMSDC and although highway schemes to help mitigate congestion are set for implementation, capacity issues in other places will endure.	<p>Policy CS21 (Infrastructure Provision) in Babergh's Core Strategy (2014) states that all proposals for housing and commercial development will be required to be supported by, and make provision for, appropriate infrastructure. Saved Policies TP01-TP19 in the Babergh Local Plan Alteration No. 2 (2006) are also relevant.</p> <p>Policy CS6 (Services and Infrastructure) in Mid Suffolk's Core Strategy (2008) states that new development will be expected to provide or support the delivery of appropriate and accessible infrastructure to meet the justifiable needs of new development. Local priorities for which infrastructure contributions may be sought include transport infrastructure, improvements in public transport and improvements to pedestrian and cycle routes. Saved Policies T04-T14 in the Mid Suffolk Local Plan (1998) are also relevant.</p> <p>Suffolk's Local Transport Plan 2011-2031 (Part 2 – Implementation Plan) sets out a number of schemes coming forward to address highway issues across the county and within BMSDC.</p> <p>Without the JLP, there is still potential for congestion to continue to be an issue in BMSDC, particularly given that the growing population is likely to exacerbate this issue. Although, the Local Transport Plan seeks to address congestion issues, the JLP presents the opportunity to address this by providing further clarity for infrastructure providers and also to strengthen policy to promote the use of alternative modes of transport. It also has the potential to direct new development to the most sustainable locations so as to minimise the need to travel by private vehicle on the local network. This approach can be used to complement measures taken by the Highways Authority to combat congestion on the strategic road network.</p>	SA Objectives 6 and 16.
BMSDC has one AQMA, which covers part of Cross Street in Sudbury, and there are five AQMAs designated in neighbouring Ipswich Borough. Additional development within BMSDC has potential to exacerbate air quality issues at these AQMA. Similarly, there is potential for a cumulative impact of development in neighbouring authorities alongside development in BMSDC in terms of air quality.	<p>Babergh's Core Strategy (2014) does not contain a specific policy on air quality but does promote the provision of infrastructure (e.g. footpaths and cycle routes) through Policy CS21 (Infrastructure Provision). Likewise, Mid Suffolk's Core Strategy (2008) does not contain an air quality policy but encourages more environmentally friendly modes of transport through Policy CS6 (Services and Infrastructure).</p> <p>Without the JLP, development may be located in less sustainable locations that increase reliance on car use, which is likely to increase air pollution. Recent national policies and the emergence of new technologies are likely to improve air quality, for example, through cleaner fuels/energy sources. Nonetheless, the JLP provides an opportunity to contribute to improved air quality in BMSDC through the sustainable siting of development and the promotion of alternative travel modes to the motorised vehicle, in line with national policy aspirations.</p>	SA Objectives 13 and 16.

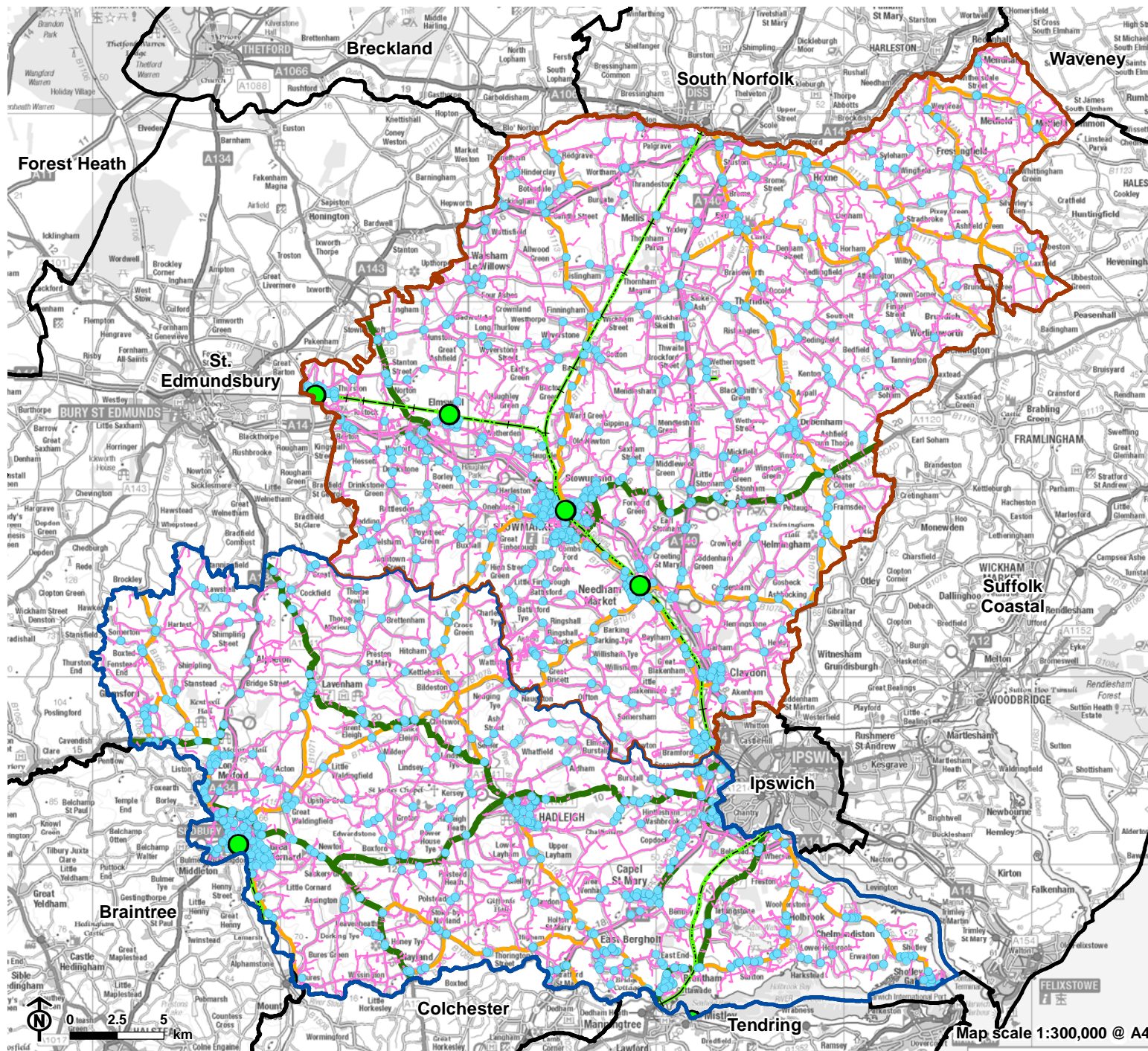
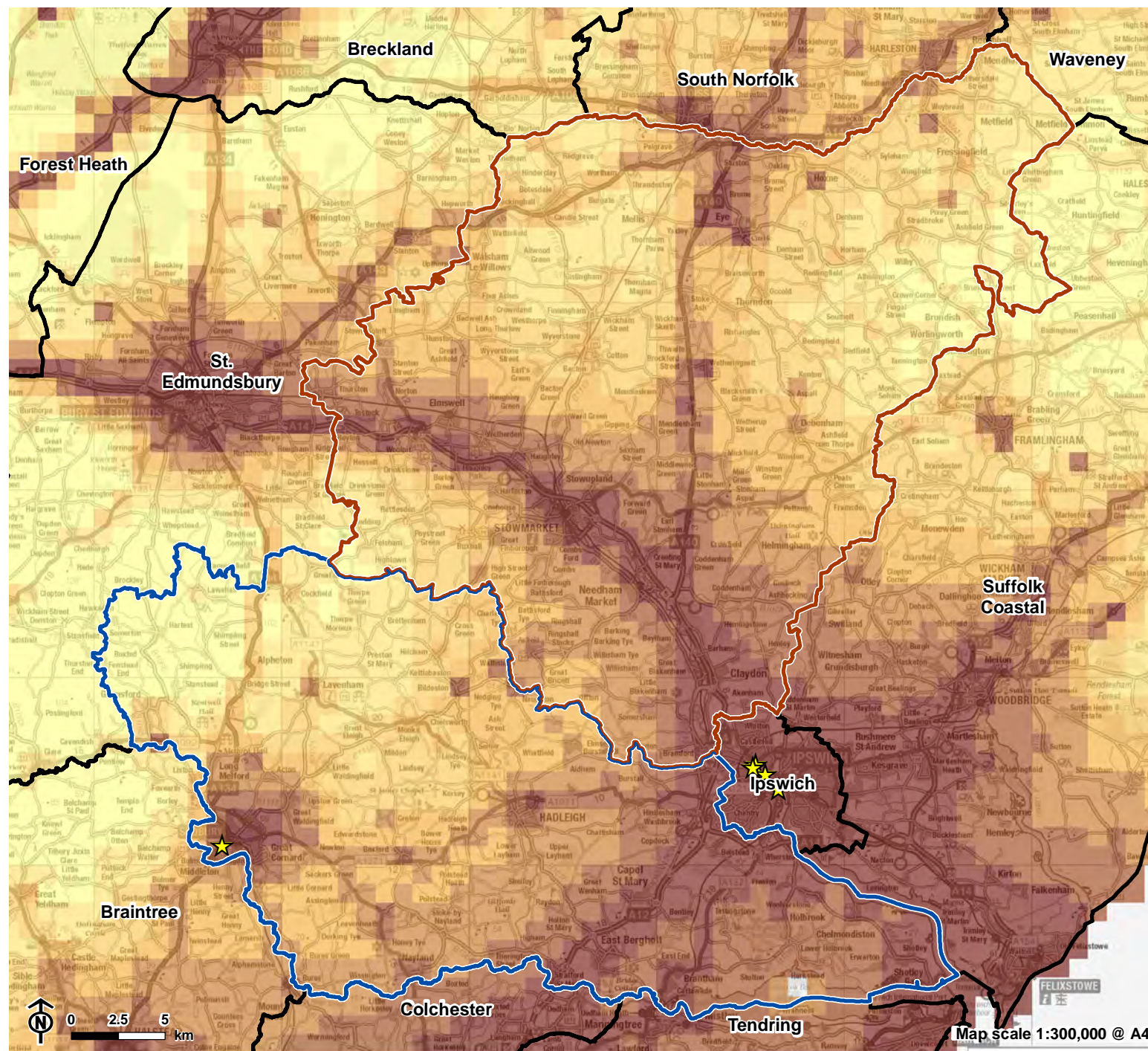


Figure 5.3: Transport Network

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- Bus stop
- Railway station
- +— Railway
- A road
- B road
- Other road

Figure 5.4: Air Quality: NO₂



- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- ★ Air Quality Management Area

NO₂ µg/m³ (2018 annual mean)*

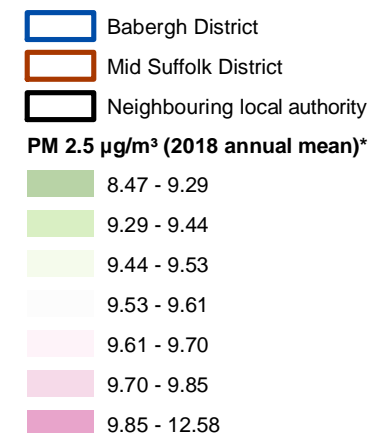
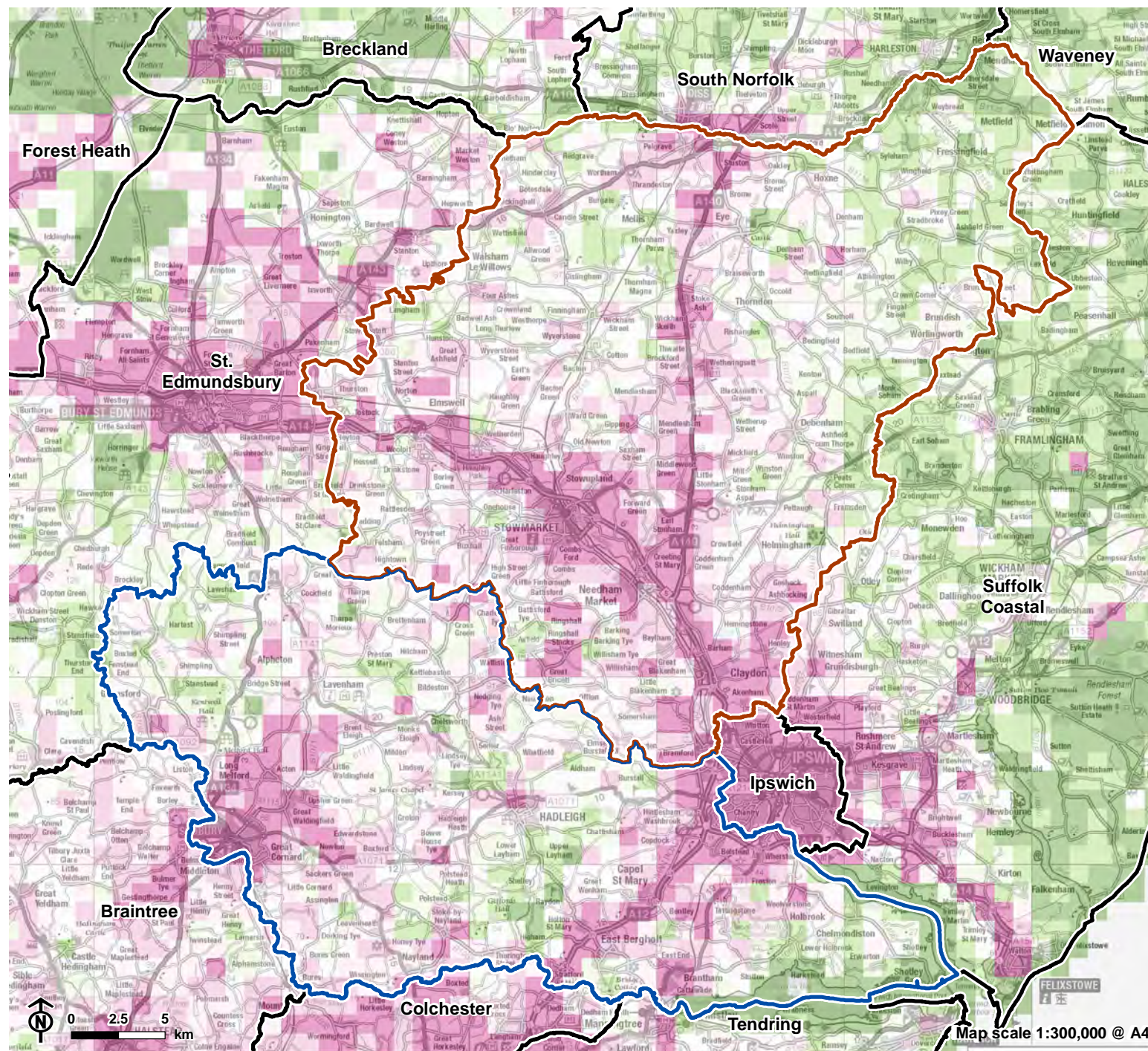
- 6.45 - 7.01
- 7.01 - 7.18
- 7.18 - 7.38
- 7.38 - 7.66
- 7.66 - 8.09
- 8.09 - 8.99
- 8.99 - 27.25

*Notes:

European Directive annual mean not to exceed 40 µg/m³. Estimated 2018 background air pollution maps (base year 2017). Total annual mean concentrations based on 1 km x 1 km grid squares are provided.

NO₂ concentration is displayed using quantile classification. Each class contains an equal number of features.

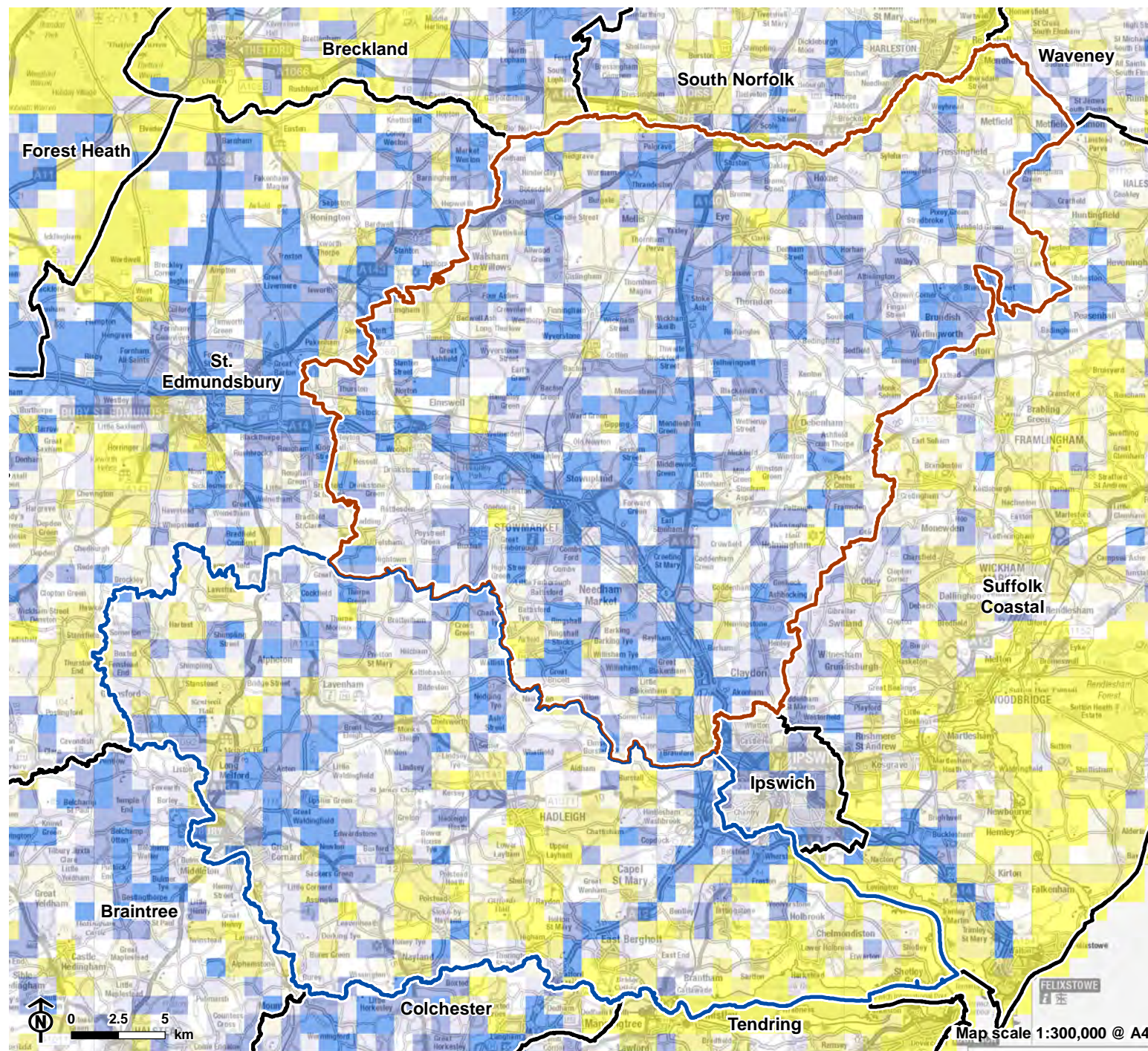
Figure 5.5 Air Quality: PM 2.5



*Notes:
PM2.5 concentrations in gravimetric units.
European Directive annual mean not to exceed 40 $\mu\text{g}/\text{m}^3$. Estimated 2018 background air pollution maps (base year 2017). Total annual mean concentrations based on 1 km x 1 km grid squares are provided.

PM2.5 concentration is displayed using quantile classification. Each class contains an equal number of features.

Figure 5.6: Air Quality: PM10



*Notes:
PM10 concentrations in gravimetric units.
European Directive annual mean not to exceed $40 \mu\text{g}/\text{m}^3$. Estimated 2018 background air pollution maps (base year 2017). Total annual mean concentrations based on 1 km x 1 km grid squares are provided.

PM10 concentration is displayed using quantile classification. Each class contains an equal number of features.

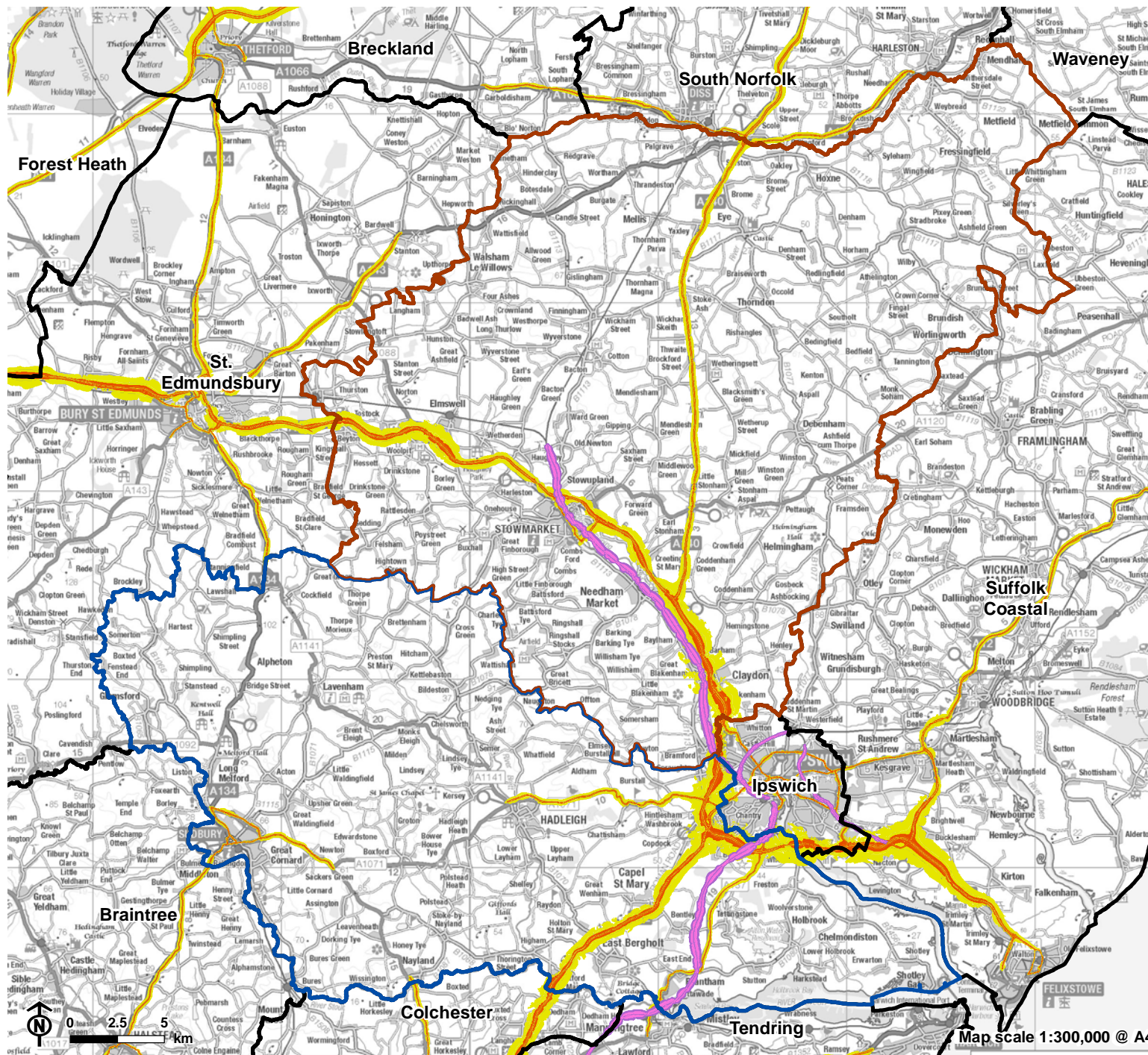


Figure 5.7: Noise Pollution

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- Road noise
 - A-weighted equivalent continuous sound level daytime - 16 hour (0700-2300) exceeding 59.9dB
 - A-weighted equivalent continuous sound level at night (2300-0700) exceeding 54.9dB
- Rail noise
 - A-weighted equivalent continuous sound level daytime - 16 hour (0700-2300) exceeding 59.9dB
 - A-weighted equivalent continuous sound level at night (2300-0700) exceeding 54.9dB

Chapter 6

Land and Water Resources

Policy context

International

6.1 European Nitrates Directive (1991)⁹¹: Identifies nitrate vulnerability zones and puts in place measures to reduce water pollution caused by the introduction of nitrates.

6.2 European Urban Waste Water Directive (1991)⁹²: Protects the environment from the adverse effects of urban waste water collection, treatment and discharge, and discharge from certain industrial sectors.

6.3 European Drinking Water Directive (1998)⁹³: Protects human health from the adverse effects of any contamination of water intended for human consumption by ensuring that it is wholesome and clean.

6.4 European Landfill Directive (1999)⁹⁴: Prevents and reduces the negative effects on the environment from the landfilling of waste by introducing stringent technical requirements for waste and landfills.

6.5 European Water Framework Directive (2000)⁹⁵: Protects inland surface waters, transitional waters, coastal waters and groundwater, and requires all member states to achieve "good ecological status" or "good ecological potential" by 2027, and for no waterbodies to experience deterioration in status. Under the obligations of this Directive, River Basin Management Plans (RBMPs) are prepared.

6.6 European Waste Framework Directive (2008)⁹⁶: Sets out the waste hierarchy requiring the reduction of waste production and its harmfulness, the recovery of waste by means of recycling, re-use or reclamation and final disposal that does not harm the environment, including human health.

6.7 European Industrial Emission Directive (2010)⁹⁷: Lays down rules on integrated prevention and control of pollution arising from industrial activities. It also lays down rules designed to prevent or, where that is not practicable, to

⁹¹ European Commission (1991) European Nitrates Directive: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31991L0676&from=EN>.

⁹² European Commission (1991) European Urban Waste Water Directive: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31991L0271&from=EN>.

⁹³ European Commission (1998) European Drinking Water Directive: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31998L0083&from=EN>.

⁹⁵ European Commission (2000) European Water Framework Directive: https://eur-lex.europa.eu/resource.html?uri=cellar:5c835afb-2ec6-4577-bdf8-756d3d694eeb.0004.02/DOC_1&format=PDF.

⁹⁶ European Commission (2008) European Waste Framework Directive: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32008L0098&from=EN>.

⁹⁷ European Commission (2010) European Industrial Emission Directive: <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:334:0017:0119:en:PDF>.

reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment taken as a whole.

National

6.8 National Planning Policy Framework (NPPF)⁹⁸: sets out the following:

- The planning system should protect and enhance soils in a manner commensurate with their statutory status or quality identified in the development plan.
- New and existing development should be prevented from contributing to, being put at an unacceptable risk from, or being adversely affected by, soil, air, water or noise pollution or land instability.
- Despoiled, degraded, derelict, contaminated and unstable land should be remediated and mitigated where appropriate.
- The reuse of previously developed land is encouraged where suitable opportunities exist.
- Plans should take a proactive approach to mitigating and adapting to climate change and ensuring resilience to climate change impacts, and new development should avoid increased vulnerability to the impacts of climate change.

6.9 National Planning Practice Guidance (PPG)⁹⁹: Requires local planning authorities to demonstrate every effort has been made to prioritise the use of poorer quality agricultural land for development where it has been demonstrated that significant development is required on agricultural land. It also requires that plan making considers, among other issues: identifying suitable sites for new or enhanced water infrastructure; assessing whether new development is appropriate near to sites used for water infrastructure; and the phasing of new development so that such infrastructure will be in place when and where needed. The impact of water infrastructure on sites designated for biodiversity should also be considered.

6.10 Waste Management Plan for England¹⁰⁰: Provides an analysis on the current waste management situation in

England and evaluates how it will support implementation of the objectives and provisions of the revised Water Framework Directive.

6.11 National Planning Policy for Waste (NPPW)

¹⁰¹: Identifies key planning objectives, requiring planning authorities to:

- Help deliver sustainable development through driving waste management up the waste hierarchy.
- Ensure waste management is considered alongside other spatial planning concerns.
- Provide a framework in which communities take more responsibility for their own waste.
- Help secure the recovery or disposal of waste without endangering human health and without harming the environment.
- Ensure the design and layout of new development supports sustainable waste management.

6.12 Safeguarding our Soils – A Strategy for England

¹⁰²: Sets out how England's soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention in tackling degradation threats, including: better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a changing climate; preventing soil pollution; effective soil protection during construction and; dealing with contaminated land.

6.13 Water White Paper¹⁰³: Sets out the Government's vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It states outlines the measures that will be taken to tackle issues such as poorly performing ecosystem, and the combined impacts of climate change and population growth on stressed water resources.

6.14 Water for Life White Paper¹⁰⁴: Sets out how to build resilience in the water sector. Objectives of the White Paper are to:

⁹⁸ Ministry of Housing, Communities & Local Government (last updated 19 June 2019) National Planning Policy Framework: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf.

⁹⁹ Ministry of Housing, Communities & Local Government (last updated 1 October 2019) Planning Practice Guidance: <https://www.gov.uk/government/collections/planning-practice-guidance>.

¹⁰⁰ Department for Environment, Food and Rural Affairs (2013) Waste management plan for England: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf.

¹⁰¹ Department for Communities and Local Government (2014) National Planning Policy for Waste:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf.

¹⁰² Department for Environment, Food and Rural Affairs (2009) Safeguarding our Soils: A Strategy for England: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69261/pb13297-soil-strategy-090910.pdf.

¹⁰³ Department for Environment, Food and Rural Affairs (2012) The Water White Paper: <https://publications.parliament.uk/pa/cm201213/cmselect/cmenvfru/374/374.pdf>.

¹⁰⁴ Department for Environment, Food and Rural Affairs (2011) Water for Life: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228861/8230.pdf.

- Paint a clear vision of the future and create the conditions which enable the water sector and water users to prepare for it.
- Deliver benefits across society through an ambitious agenda for improving water quality, working with local communities to make early improvements in the health of our rivers by reducing pollution and tackling unsustainable abstraction.
- Keep short- and longer-term affordability for customers at the centre of decision making in the water sector.
- Protect the interest of taxpayers in the policy decisions that we take.
- Ensure a stable framework for the water sector which remains attractive to investors.
- Stimulate cultural change in the water sector by removing barriers to competition, fostering innovation and efficiency, and encouraging new entrants to the market to help improve the range and quality of services offered to customers and cut business costs.
- Work with water companies, regulators and other stakeholders to build understanding of the impact personal choices have on the water environment, water resources and costs.
- Set out roles and responsibilities – including where Government will take a stronger role in strategic direction setting and assessing resilience to future challenges, as well as clear expectations on the regulators.

6.15 Future Water: The Government's Water Strategy for England¹⁰⁵: Sets out how the Government wants the water sector to look by 2030, providing an outline of steps which need to be taken to get there. These steps include improving the supply of water; agreeing on important new infrastructure such as reservoirs; proposals to time limit abstraction licences; and reducing leakage. The document also states that pollution to rivers will be tackled, whilst discharge from sewers will be reduced.

Sub-national

6.16 Suffolk Minerals & Waste Local Plan Submission Draft (June 2018) is yet to be adopted. The Plan contains planning policies for determining planning applications for minerals and waste development. The Plan allocates 10 sites

for the extraction of sand and gravel sufficient to supply 9.300 Mt over the Plan period to the end of 2036. The Plan also has policies to maintain a landbank of permitted reserves of at least 7 years based upon the average of the last 10 years' sales.

6.17 Babergh District Council Contaminated Land Strategy (2009)¹⁰⁶: Provides the strategy that the Council will use to take action to prevent harm from occurring, as well as the strategy for inspecting contaminated land in the District and how the Council will manage the information generated to ensure the polluter pays.

6.18 Mid Suffolk District Council Statutory Contaminated Land Strategy (2006)¹⁰⁷: The report details the contaminated land strategy including a description of the Mid Suffolk area and how particular characteristics may impact on inspection strategy. It also explains the strategy for the identification of contaminated sites and how sites are prioritised according to risk. The report details the strategy for obtaining further information on pollutant linkages and the risk assessment process. The strategy also covers written determination, liability and enforcement.

6.19 Sudbury and Great Cornard Surface Water Management Plan (2019)¹⁰⁸: This is a Surface Water Management Plan (SWMP) for the towns of Sudbury and Great Cornard which adheres to the four-stage approach set out in Defra's SWMP Technical Guidance Document (March 2010).

Current baseline

Geology and minerals

6.20 The geology of Suffolk compared to other parts of the UK is relatively simple. The County has an extensive spread of till (boulder clay) which is underlain by chalk.

6.21 The principal mineral resource within Suffolk is sand and gravel. Sand and gravel deposits are distributed fairly evenly across the County, although there are particular concentrations in the river valleys, especially the Gipping valley (which runs from roughly the north-west of the county down to Ipswich and the coast).

¹⁰⁵ HM Government (2008) Future Water: The Government's water strategy for England: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69346/pb13562-future-water-080204.pdf.

¹⁰⁶ Babergh District Council (2009) Contaminated Land Strategy: <https://www.babergh.gov.uk/assets/Environment/Contaminated-Land-Strategy-.pdf>.

¹⁰⁷ Mid Suffolk District Council (2000) Statutory Contaminated Land Strategy: <https://www.babergh.gov.uk/assets/Environment/Contaminated-Land-Strategy-Mid-Suffolk.pdf>.

¹⁰⁸ BMT (2019) Sudbury and Great Cornard Surface Water Management Plan: <http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Surface-Water-Management-Plans/FINALSudburyandGreatCornardSWMPv3.pdf>.

6.22 Suffolk Local Aggregates Assessment (2018)¹⁰⁹ estimates the quantity of minerals across the County and plans for a steady and adequate supply of aggregates over the coming years to help meet housing and infrastructure needs. The report covers how the demand for construction aggregates is met within Suffolk. According to the assessment, the supply of aggregates to Suffolk is made up of sand and gravel imported from surrounding counties, along with imported crushed rock, marine dredged gravel and sand, indigenous and imported recycled construction, demolition and excavation waste.

6.23 According to the Minerals Core Strategy¹¹⁰, the most recent forecast and county apportionment on sand and gravel agreed by the East of England Regional Aggregates Working Party in 2003 was 1.73mt per annum. Since 2003, the annual landbank calculation has been based on this provision. Suffolk does not have an apportionment for any other mineral.

6.24 The total permitted and committed reserves at the beginning of 2007 was 16.85mt. With an apportionment of 1.73mt per annum, these reserves would be sufficient for 9.7 years (until 2015). To ensure a continuing supply of aggregate for the period of the Plan up to 2021, a further 9.2mt needs to be identified.

6.25 The minerals sites in the two Districts are shown in **Figure 6.1**.

6.26 BMSDC has national and local designations for their geological significance, with one County Geological Site in each of the two Districts:

- **Babergh District:** Harkstead cliff and shore – London clay cliffs with brickearth/channel deposit at the east end and contorted gravel above.
- **Mid Suffolk District:** Needham Lake Erratic – glacial erratic boulder.

6.27 41 Sites of Special Scientific Interest (SSSI) are present within BMSDC, five of which are designated for their geological significance:

- **Hoxne Brick Pit SSSI:** This SSSI is 1.3 hectares with flint hand axes dating back 400,000 years. Hoxnian Stage deposits have also been found at the site.
- **Hascot Hill Pit SSSI:** This SSSI is 0.3 hectares and the only known site to expose beach deposits from late Pliocene and early Pleistocene Red Crag Formation.
- **Sandy Lane Pit SSSI, Barham:** This SSSI is 11.1 hectares with deposits that span from the Beestonian

stage through to the Cromerian Stage and then to the severe ice age of the Anglian Stage.

- **Creeting St Mary Pits SSSI:** This SSSI is 5.4 hectares with former quarries that are the 'type site' for Creeting Sands. Creeting Sands are intertidal and shallow marine deposits from early Pleistocene interglacial age.
- **Great Blakenham Pit SSSI:** This SSSI is 2.2 hectares and a key site for Pleistocene studies, with a range of early and middle Pleistocene deposits.

Soils

6.28 The underlying soils give rise to a mix of classified agricultural land, as shown in **Figure 6.2**. The majority of land within Babergh and Mid Suffolk is Agricultural Land Classification Grade 2 or 3. There are some small areas designated as Grade 4, urban and non-agricultural. Grade 1 and Grade 2 agricultural land represent the best and most versatile land for farming, along with Grade 3a agricultural land, but the national maps of agricultural land classification do not distinguish between Grade 3a and Grade 3b agricultural land.

Contaminated Land

6.29 For a site to meet the definition of contaminated land, a pollutant linkage must be established. A pollutant linkage consists of three parts: a source of contamination in, on or under the ground; a pathway by which the contaminant is causing significant harm or harm (or which presents a significant possibility of such harm being caused); and a receptor of a type specified in the regulations.

6.30 Babergh and Mid Suffolk Councils are required to maintain a Public Register of Contaminated Land under the Environmental Protection Act 1990 however, there are currently no entries on register in either Districts. Over the next few years the Councils plan to inspect the Districts for contaminated land to help prevent harm to the environment and human health. Babergh and Mid Suffolk have separate contaminated land strategies that provide further information about how the Councils plan to examine the contaminated land.

Water

6.31 The Districts are within the Anglian River Basin, the management plan of which aims to prevent physical modifications, negative effects of invasive non-native species, pollution from wastewater, towns, cities, rural areas and transport. Babergh is in the Combined Essex Catchment

¹⁰⁹ Suffolk County Council (2018) Suffolk Local Aggregates Assessment: <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Local-Aggregates-Assessment-2018-dataLatest-Version.pdf>.

¹¹⁰ SCC (2008) Minerals Core Strategy: <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Minerals-Core-Strategy-Adopted-Version.pdf>.

Partnership and Mid Suffolk is in the East Suffolk Catchment Partnership. The idea behind these partnerships is to engage a wide range of stakeholders and encourage local action to protect and enhance the water environment.

6.32 Anglian Water provides for Babergh District, whilst Essex and Suffolk Water provides for Mid Suffolk, yet both 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 harms associated with droughts, ranging from small-scale water inefficiencies to large-scale ones.

6.33 There are Source Protection Zones (SPZs) scattered throughout the Districts, as shown in **Figure 6.3**. However, SPZ 3 covers the majority of the Districts which is the total catchment. Small areas across the Districts make up the inner and outer catchments.

6.34 Drinking Water Safeguard Zones (Surface Water) are catchment areas that influence the water quality for their respective Drinking Water Protected Area (Surface Water), which are at risk of failing the drinking water protection objectives. These non-statutory Safeguard Zones are where action to address water contamination will be targeted, so that extra treatment by water companies can be avoided. Safeguard Zones are a joint initiative between the Environment Agency and water companies. Safeguard Zones are one of the main tools for delivering the drinking water protection objectives of the Water Framework Directive. This data includes what substances are causing the drinking water protected area to be 'at risk'. Safeguard Zones cover the majority of land in both Districts.

6.35 The water quality within Babergh District has been assessed through their Water Cycle Study¹¹¹. Most of the surface water bodies have been rated as "moderate" ecological status with a target to improve to "good" within the existing plan period until 2031. However, the tidal River Orwell was recorded as "good" overall and was the only watercourse to achieve this status. Three watercourses, which include Bildeston Brook, Belstead Brook and the River Gipping, were all rated as having "poor" ecological status, whilst both groundwater resources were recorded as "poor".

6.36 Babergh District is served by 45 wastewater treatment works (WwTWs), with four of these extending beyond the District's boundaries serving neighbouring Local Authorities as well¹¹². All WwTWs have varying catchment sizes and capacity. There are seven WwTWs that do not have any available capacity, while six have minimal capacity.

Waste

6.37 Within Suffolk County, there are currently 100 active waste management facilities¹¹³, 17 of which are located in Babergh District and 34 of which are located in Mid Suffolk District. A growing population in BMSDC will place pressure on existing waste management facilities and as such, there will be a requirement to meet growing needs.

Key sustainability issues

6.38 The key sustainability issues for land and water resources, and their likely evolution without the JLP are shown in **Table 6.1**.

Table 6.1: Key sustainability issues and likely evolution without the Joint Local Plan

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA Objectives
BMSDC contains safeguarded mineral resources which, where possible, should not be lost or compromised by future growth.	Babergh's Core Strategy (2014) contains text encouraging the re-use of brownfield land. This is beneficial as it will limit the amount of development on land that could be used for minerals extraction in the future. The Local Plan Alteration No. 2 (2006) does not contain a policy on brownfield land and neither does Mid Suffolk's Core Strategy (2008) and Local Plan (1998). Without the JLP, it is possible that development could result in unnecessary sterilisation of mineral resources which would mean they are not available for future generations to use. The JLP provides an opportunity to promote development on brownfield land, in addition to the safeguarding of minerals resources.	SA Objective 7.
The majority of BMSDC comprises best and most versatile agricultural land with a mix of classified	Babergh's Core Strategy (2014) and Local Plan Alteration No. 2 (2006) do not contain a policy on best and most versatile agricultural land. However, the National Planning Policy Framework (NPPF) supports the reuse of brownfield land and states that planning policies and decisions should contribute to and enhance the natural	SA Objectives 7 and 11.

¹¹¹ Royal Haskoning (2011) Babergh Water Cycle Study: <https://www.babergh.gov.uk/assets/Strategic-Planning/Babergh-Core-Strategy/CoreStrategyCoreDocList/BDCWaterCycleStudyFinalv2Report.pdf>.

¹¹² Babergh District Council (2011) Water Cycle Study: <https://www.babergh.gov.uk/assets/Strategic-Planning/Babergh-Core-Strategy/CoreStrategyCoreDocList/BDCWaterCycleStudyFinalv2Report.pdf>.

¹¹³ Suffolk County Council (2015) Waste Policies: Monitoring Report 2014: <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-applications/Minerals-and-Waste-Development-Planning/Annual-Monitoring-Reports/Waste-MR-Final-March-2015.pdf>.

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA Objectives
agricultural land (Grades 1, 2, and 3). New development should, where possible, be delivered as to avoid the loss of higher grades of agricultural land.	<p>and local environment by “recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land”</p> <p>Policy CS8 (Brown Field Target) in Mid Suffolk’s Core Strategy (2008) does not contain a policy on agricultural land but states that the District Council has a target of 50% of dwellings to be built on brownfield/previously developed land in Mid Suffolk. However, Saved Policy CL11 (Retaining high quality agricultural land) in the Local Plan (1998) encourages the conservation of agricultural land, particularly the best and most versatile agricultural land.</p> <p>Without the JLP, it is likely that development would, in some instances, take place on the best and most versatile agricultural land. The JLP provides an opportunity to strengthen the approach and ensure these natural assets are not lost or compromised. This may involve the prioritisation of use of brownfield sites and lower quality agricultural land for development.</p>	
Due to Babergh and Mid Suffolk having numerous rivers running through their areas (e.g. the River Gipping and River Brett), there is a need to ensure that not only the rivers are protected but that all water sources including groundwater are too. Many areas in BMSDC are covered by Source Protection Zones.	<p>Policy CS15 (Implementing Sustainable Development in Babergh) in Babergh’s Core Strategy (2014) seeks to ensure that there is no deterioration of the status of the water environment in terms of water quality, water quantity and physical characteristics. Mid Suffolk’s Core Strategy (2008) and Local Plan (1998) do not contain a policy on this.</p> <p>Without the JLP, it is possible that development could be located in areas that will exacerbate existing water quality issues, despite existing safeguards, such as the EU Water Framework Directive, which provides some protection. Development that occurs within Source Protection Zones presents a risk of contamination from any activity that might cause pollution in an area. The JLP provides an opportunity to ensure that development is located and designed to take into account the sensitivity of the water environment, including sufficient waste water treatment capacity to accommodate growth.</p>	SA Objective 5.
Anglian Water provides for Babergh District, whilst Essex and Suffolk Water provides for Mid Suffolk – both of which are prone to drought. Due to water being imported from elsewhere in the country, there must be effective and reliable water systems in place to reduce any harm associated with droughts. The likelihood of droughts may increase as a result of climate change, and it should be noted that there is significant cross-over between water resource availability and water quality	<p>Policy CS15 (Implementing Sustainable Development in Babergh) in Babergh’s Core Strategy (2014) seeks to ensure that there is no deterioration of the status of the water environment in terms of water quality, water quantity and physical characteristics. Mid Suffolk’s Core Strategy (2008) and Local Plan (1998) do not contain a policy on this.</p> <p>Without the JLP, it is possible that development could be located in areas that will exacerbate the water stress issue. The JLP has the potential to secure long term sustainable development, which will be essential in ensuring that all new development implements water efficiency standards, and that the phasing of new development is in line with any implementation timescales for any new strategic schemes that water companies might require.</p>	SA Objectives 5 and 9.
A growing population and an increase in development will place pressure on wastewater treatment works (WwTWs). Seven WwTWs have been identified as not having available capacity to meet these needs.	Policy CS15 (Implementing Sustainable Development in Babergh) in Babergh’s Core Strategy (2014) states that development will be required to minimise wastewater during construction, and promote and provide for the reduction, re-use and recycling of all types of waste from the completed development. There are no policies on wastewater in Mid Suffolk’s existing Local Plan. Without the JLP, it is likely that capacity for wastewater treatment will develop as Suffolk County Council is responsible for its provision. However, the JLP provides an opportunity to encourage the minimisation of wastewater during construction and the operation of buildings.	SA Objective 5.
A growing population will place increased pressure on waste management facilities and there will be a	Policy CS6 in Mid Suffolk’s Core Strategy (2008) states that new development will be expected to provide or support the delivery of appropriate infrastructure, including waste minimisation and recycling initiatives. Policy CS2 (Development in the Countryside and Countryside Villages) requires the provision of waste management facilities in the Countryside and Countryside Villages. Lastly, Policy CS3 (Reduce	SA Objective 8.

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA Objectives
requirement to meet these growing needs.	contributions to Climate Change) states that adequate provision will be made for the separation and storage of waste for recycling. There are no policies on waste in Babergh's existing Local Plan. Without the JLP, it is likely that waste management provision would continue as Suffolk County Council is responsible for its provision. However, the JLP still provides an opportunity to promote waste minimisation and recycling initiatives.	

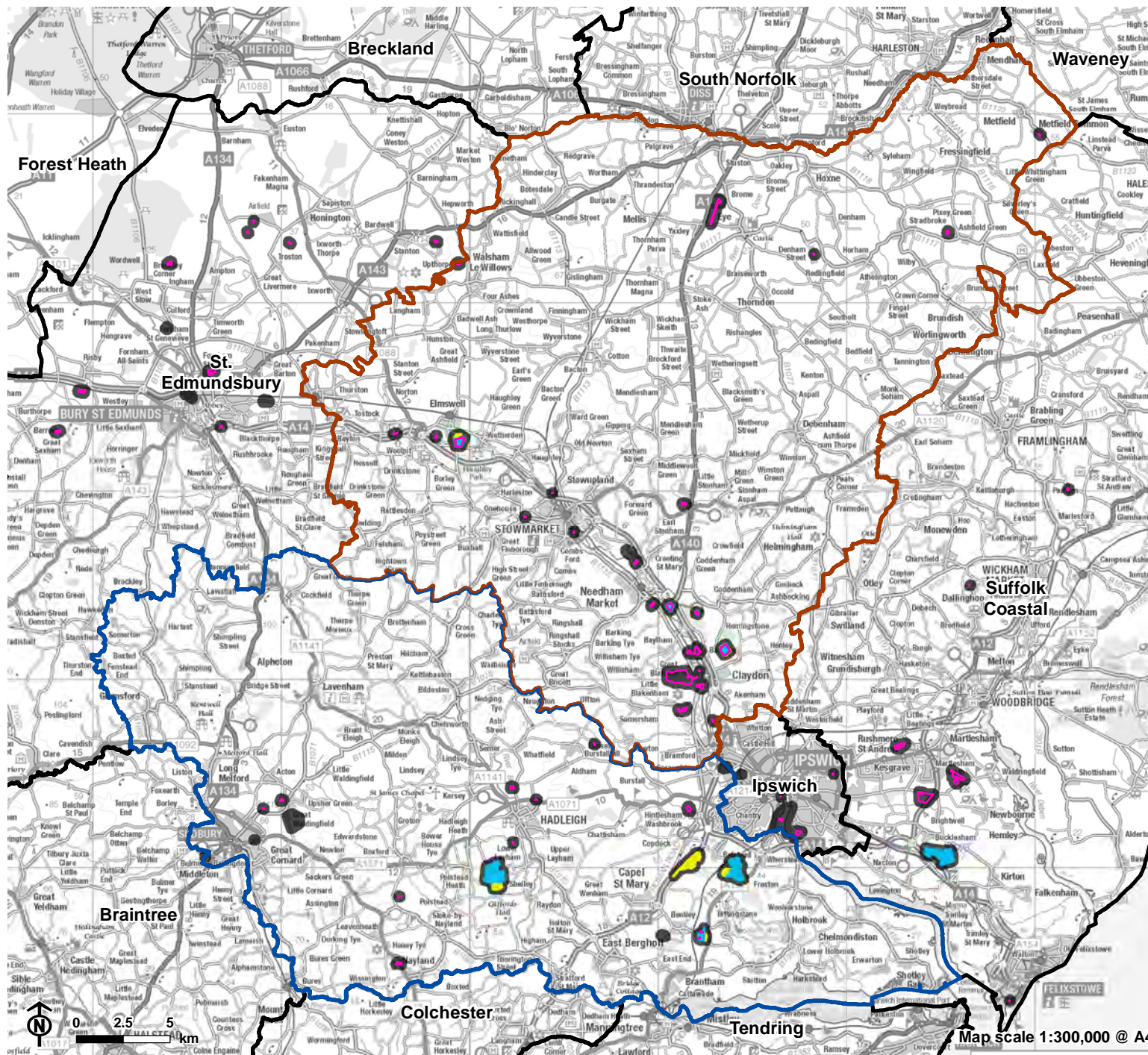
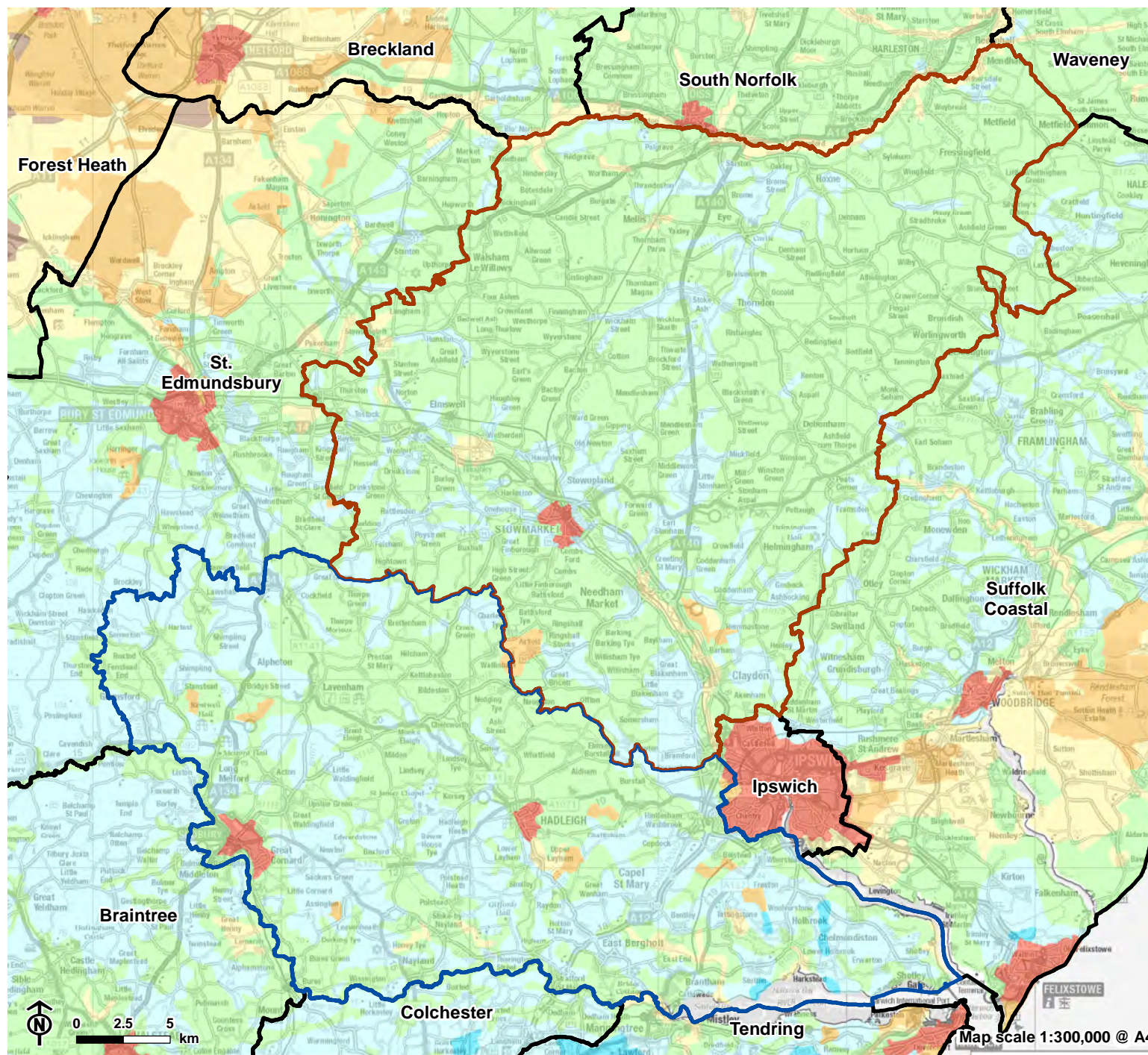


Figure 6.1: Minerals and Waste Sites

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- Current mineral extraction site
- Proposed mineral extraction site
- Waste site
- 250 metre Site Safeguard Area

**Figure 6.2: Agricultural Land
Classification**



- Babergh District
- Mid Suffolk District
- Neighbouring local authority

Agricultural Land Classification

- Grade 1
- Grade 2
- Grade 3
- Grade 4
- Grade 5
- Non agricultural
- Urban

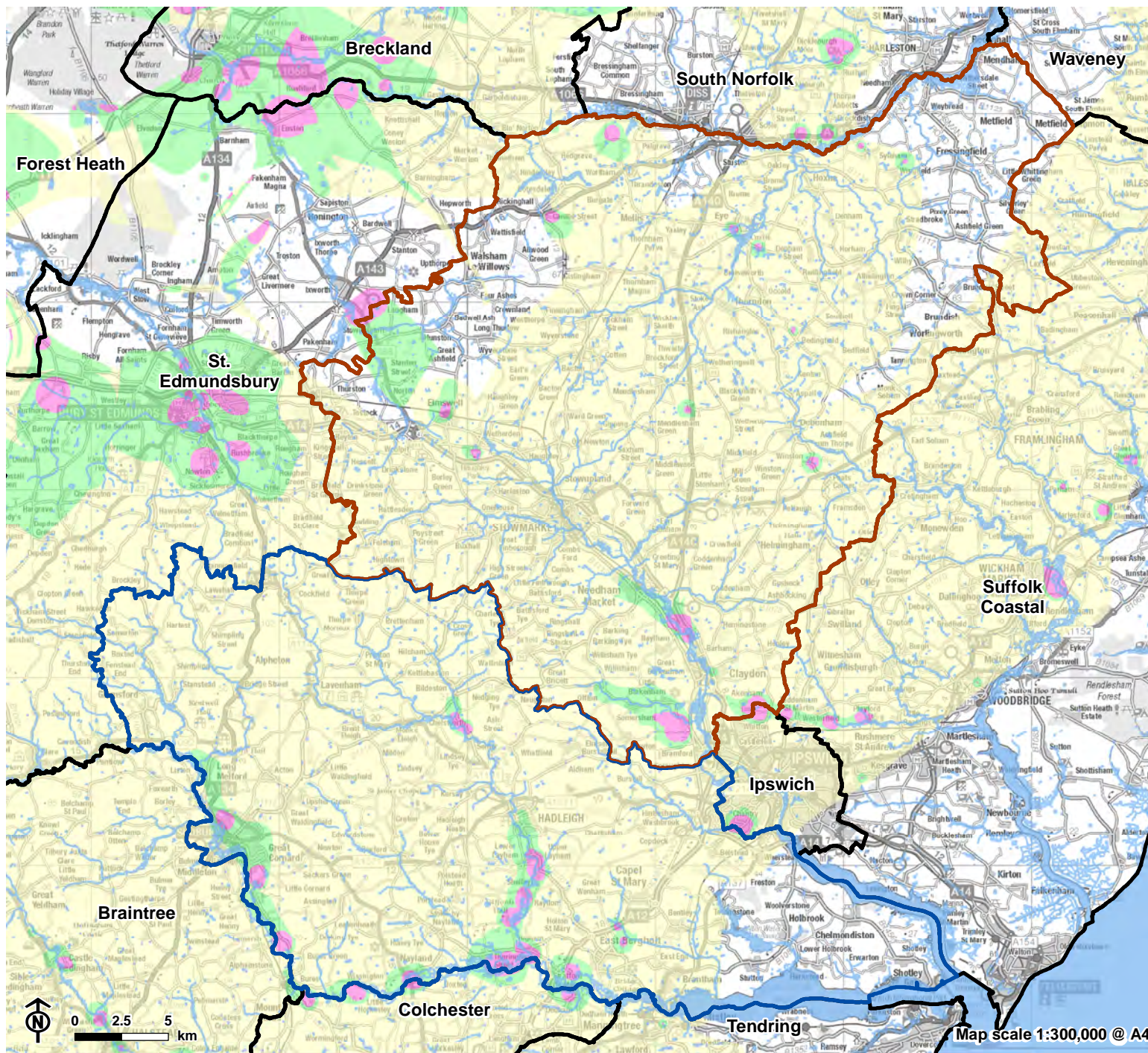


Figure 6.3: Watercourses and Source Protection Zones

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- Watercourse
- Source protection zone**
- Zone 1
- Zone 2
- Zone 3

Chapter 7

Climate Change Adaptation and Mitigation

Policy context

International

7.1 European Floods Directive (2007)¹¹⁴: A framework for the assessment and management of flood risk, aiming at the reduction of the adverse consequences for human health, the environment, cultural heritage and economic activity.

7.2 European Energy Performance of Buildings Directive (2010)¹¹⁵: Aims to promote the energy performance of buildings and building units. Requires the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance.

7.3 United Nations Paris Climate Change Agreement (2015)¹¹⁶: International agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

National

7.4 National Planning Policy Framework (NPPF)¹¹⁷: Contains the following:

- One of the core planning principles is to “support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure”.
- Inappropriate development in areas at risk of flooding should be avoided. Where development is necessary, it should be made safe for its lifetime without increasing flood risk elsewhere.
- Local planning authorities should adopt a proactive approach to mitigate and adapt to climate change, taking full account of flood risk, coastal change, water supply,

¹¹⁴ European Commission (2007) European Floods Directive: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32007L0060&from=EN>.

¹¹⁵ European Commission (2010) European Energy Performance of Buildings Directive: <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:153:0013:0035:EN:PDF>.

¹¹⁶ United Nations (2015) Paris Agreement: http://unfccc.int/files/essential_background/convention/application/pdf/english_paris_agreement.pdf.

¹¹⁷ Ministry of Housing, Communities and Local Government (last updated 19 June 2019) National Planning Policy Framework: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf.

biodiversity and landscapes, and the risk of overheating from rising temperatures.

7.5 National Planning Practice Guidance (PPG)¹¹⁸:

Supports the content of the NPPF by promoting low carbon and renewable energy generation, including decentralised energy, the energy efficiency of existing and new buildings and sustainable transport.

7.6 Planning Act 2008¹¹⁹: The Planning Act 2008 was amended under the Environmental Assessments and Miscellaneous Planning (EU Exit) Regulations 2018. Section 182 places a legal duty on local planning authorities to ensure that their development plan documents include policies to ensure that development and use of land in their area contributes to the mitigation of, and adaptation to, climate change.

7.7 Planning and Energy Act (2008)¹²⁰: enables local planning authorities to set requirements for carbon reduction and renewable energy provision. It should be noted that while the Housing Standards Review proposed to repeal some of these provisions, at the time of writing there have been no amendments to the Planning and Energy Act.

7.8 Climate Change Act 2008¹²¹: Sets targets for UK greenhouse gas emission reductions of at least 100% by 2050 and CO2 emission reductions of at least 26% by 2015, against a 1990 baseline (in 2008 the target was set at 80%, however the target has recently been amended in 2019 by Statutory Instrument No.1056 to 100%).

7.9 Flood and Water Management Act (2010)¹²²: Sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

7.10 Environment Act, Government Legislation (1995)¹²³: The act notes the establishment of the Environment Agency and the Scottish Environment Protection Agency. It provides

guidance on these agencies and sets environmental management standards.

7.11 The UK Renewable Energy Strategy¹²⁴: Sets out the ways in which we will tackle climate change by reducing our CO2 emissions through the generation of a renewable electricity, heat and transport technologies.

7.12 The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK¹²⁵: Aims to realise the wider energy efficiency potential that is available in the UK economy by maximising the potential of existing dwellings by implementing 21st century energy management initiatives on 19th century homes.

7.13 The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate¹²⁶: Sets out visions for the following sectors:

- People and the Built Environment – “to promote the development of a healthy, equitable and resilient population, well placed to reduce the harmful health impacts of climate change...buildings and places (including built heritage) and the people who live and work in them are resilient and organisations in the built environment sector have an increased capacity to address the risks and make the most of the opportunities of a changing climate.”
- Infrastructure – “an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate”.
- Natural Environment – “the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides.”
- Business and Industry – “UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change.”
- Local Government – “Local government plays a central role in leading and supporting local places to become

¹¹⁸ Ministry of Housing, Communities & Local Government (last updated 1 October 2019) Planning Practice Guidance: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf.

¹¹⁹ HM Government (2008) Planning Act 2008: <http://www.legislation.gov.uk/ukpga/2008/29/contents>.

¹²⁰ HM Government (2008) Planning and Energy Act 2008: <https://www.legislation.gov.uk/ukpga/2008/21>.

¹²¹ HM Government (2008) Climate Change Act 2008: https://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga_20080027_en.pdf.

¹²² HM Government (2010) Flood and Water Management Act 2010: http://www.legislation.gov.uk/ukpga/2010/29/pdfs/ukpga_20100029_en.pdf.

¹²³ HM Government (1995) Environment Act: <http://www.legislation.gov.uk/ukpga/1995/25/contents>.

¹²⁴ HM Government (2009) The UK Renewable Energy Strategy: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228866/7686.pdf.

¹²⁵ Department of Energy & Climate Change (2012) The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/65602/6927-energy-efficiency-strategy-the-energy-efficiency.pdf.

¹²⁶ HM Government (2018) The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727252/national-adaptation-programme-2018.pdf.

more resilient to a range of future risks and to be prepared for the opportunities from a changing climate.”

7.14 UK Climate Change Risk Assessment 2017¹²⁷: Sets out six priority areas needing urgent further action over the next five years in order to minimise risk from the effects of climate change. These priority areas include: flooding and coastal change risk to communities, businesses and infrastructure; risks to health, wellbeing and productivity from high temperatures; risk of shortages in the public water supply and for agriculture, energy generation and industry; risks to natural capital; risks to domestic and international food production and trade; and new and emerging pests and diseases and invasive species.

7.15 Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England¹²⁸: This Strategy sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are to:

- Manage the risk to people and their property.
- Facilitate decision-making and action at the appropriate level – individual, community or local authority, river catchment, coastal cell or national.
- Achieve environmental, social and economic benefits, consistent with the principles of sustainable development.

7.16 A Green Future: Our 25 Year Plan to Improve the Environment¹²⁹: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: using and managing land sustainably; and protecting and improving our global environment. Actions that will be taken as part of these two key areas are as follows:

- Using and managing land sustainably:
 - Take action to reduce the risk of harm from flooding and coastal erosion including greater use of natural flood management solutions.
- Protecting and improving our global environment:
 - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.

7.17 Anglian river basin district: Flood Risk Management Plan 2015-21¹³⁰: The plan determines the risk of flooding from rivers, the sea, surface water, groundwater and reservoirs in the Anglian river basin district. Risk management authorities can use the plan to manage flood and coastal erosion risk.

Sub-national

7.18 Transforming Suffolk, Suffolk’s Community Strategy 2008 to 2028¹³¹: Sets out ambitions for Suffolk to be recognised for its outstanding environment and quality of life for all. The strategy aims to help make Suffolk the greenest county by enhancing the natural environment while also being an exemplar when tackling climate change.

7.19 Suffolk Climate Action Plan (2013)¹³²: Sets out the emissions reduction target for 2025. The report also focuses on four themes: adaptation – business and community resilience; business energy efficiency and renewables; and community energy and domestic energy efficiency.

7.20 Suffolk Flood Risk Management Strategy (2016)¹³³: Aims to impact the activities of all flood risk management authorities and is an important tool to help everyone manage flood risk. The relevant companies and bodies have a duty with regards to the strategy. The strategy focuses on local flooding from surface water, ground water or ordinary water course such as ditches and streams.

7.21 East Suffolk Catchment Flood Management Plan 2009¹³⁴: The plan has assessed inland flood risk from rivers, ground water, surface water and tidal flooding within East

¹²⁷ HM Government (2017) UK Climate Change Risk Assessment: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/584281/uk-climate-change-risk-assess-2017.pdf.

¹²⁸ HM Government (2011) Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228898/9780108510366.pdf.

¹²⁹ HM Government (2018) A Green Future: Our 23 Year Plan to Improve the Environment: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf.

¹³⁰ Environment Agency (2016) Anglian river basin district: Flood Risk Management Plan:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/509053/LIT_10194_ANGLIAN_FRMP_SUMMARY_.pdf.

¹³¹ Suffolk Strategic Partnership (2008) Transforming Suffolk 2008-2028: https://www.ipswich.gov.uk/sites/default/files/scd07_-_suffolk_community_strategy.pdf.

¹³² Green Suffolk (2017) Climate Change Action Plan 3: <http://www.greensuffolk.org/assets/Greenest-County/SCCP/Climate-Change/Suffolk-Climate-Action-Plan-3.pdf>.

¹³³ Suffolk Flood Risk Management Partnership (2018) Suffolk Flood Risk Management Strategy: <http://www.greensuffolk.org/assets/Greenest-County/Water-Coast/Suffolk-Flood-Partnership/2018-Strategy-Documents/2016-04-Suffolk-Flood-Risk-Management-Strategy-v12.pdf>.

¹³⁴ Environment Agency (2009) East Suffolk Catchment Flood Management Plan: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/509053/LIT_10194_ANGLIAN_FRMP_SUMMARY_.pdf.

Suffolk. The plan establishes flood risk management policies which will deliver sustainable flood risk management.

7.22 Great Ouse Catchment Flood Management Plan

2011¹³⁵: The plan has assessed inland flood risk from rivers, ground water, surface water and tidal flooding within Great Ouse. The plan establishes flood risk management policies which will deliver sustainable flood risk management.

7.23 North Essex Catchment Flood Management Plan

2009¹³⁶: The plan has assessed inland flood risk from rivers, ground water, surface water and tidal flooding within North Essex. The plan establishes flood risk management policies which will deliver sustainable flood risk management.

7.24 Broadland Rivers Catchment Flood Management Plan

2009¹³⁷: The plan has assessed inland flood risk from rivers, ground water, surface water and tidal flooding within Broadland Rivers. The plan establishes flood risk management policies which will deliver sustainable flood risk management.

7.25 Sudbury and Great Cornard Surface Water

Management Plan 2019¹³⁸: The plan is a study to understand the flood risk in the local area, identify a range of options to manage the risk and then implement and review the action plan.

Current baseline

7.26 In Suffolk, climate change poses particular serious risks as the county is characterised by its long, low-lying coastline. The ageing population, alongside children, will be particularly at risk from climate change as rising temperatures in the summer coupled with milder temperatures during winter months will become increasingly detrimental. There will be an increase in the intensity and frequency of extreme weather events as a result of climate change.

Climate emergency

7.27 In July 2019, BMSDC declared a Climate Emergency. The Environment and Climate Change Task Force was subsequently set up to look at the climate challenge being

faced in both Districts, and to explore ways the Councils can work towards their ambition to become carbon neutral by 2030. An Action Plan is expected to be presented to Cabinets and made available in Spring 2020¹³⁹.

Climate change mitigation

7.28 Between 2005 and 2017 in Babergh District, per capita carbon emissions fell from 8.1 tonnes to 5.8. In Mid Suffolk District, per capita emissions are higher and fell from 9.5 to 6.3 tonnes over the same period. As of 2016, the average for Suffolk County was 5.5 tonnes per capita, and the national average was 5.3 tonnes per capita. Therefore, both Districts are underperforming against the national and regional averages.

7.29 As set out in **Table 7.1**, both Babergh and Mid Suffolk achieved overall reductions in carbon emissions between 2005 and 2017, at 37% and 26% respectively. In both cases, these reductions were mostly due to progress in reducing emissions from domestic sources, closely followed by industrial and commercial sectors, with minimal progress on transport emissions. Transport makes the largest contribution to carbon emissions in both Districts.

7.30 The Suffolk Climate Change Partnership, which consists of Suffolk's local authorities and the Environment Agency, working with other organisations locally, published a Suffolk Climate Action Plan¹⁴⁰ in 2017. According to this document, the County is trending around a 32% reduction in absolute emissions between 2010 and 2025, against their target of 35%.

7.31 The proportion of emissions in the East of England in comparison to other regions was approximately 9.3% in 2017, which made the East of England the fourth highest emitter behind the South East (12.5%), the North West (11.2%) and Yorkshire and the Humber (10.2%)¹⁴¹.

7.32 Between 2005 and 2017, the East of England has seen a percentage decrease of 28% in total CO₂ emissions. In

[achment_data/file/288886/East_Suffolk_Catchment_Flood_Management_Plan.pdf](#).

¹³⁵ Environment Agency (2011) Great Ouse Catchment Management Plan: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/288877/Great_Ouse_Catchment_Flood_Management_Plan.pdf.

¹³⁶ Environment Agency (2009) North Essex Catchment Flood Management Plan: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/288888/North_Essex_Catchment_Flood_Management_Plan.pdf.

¹³⁷ Environment Agency (2009) Broadland Rivers Catchment Flood Management Plan: Broadland Rivers Catchment Flood Management Plan 2009: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/288882/Broadland_Rivers_Catchment_Flood_Management_Plan.pdf.

¹³⁸ BMT (2019) Sudbury and Great Cornard Surface Water Management Plan: <http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Surface-Water-Management-Plans/FINALSudburyandGreatCornardSWMPv3.pdf>.

¹³⁹ BMSDC (2020) Climate Change Task Force Terms of Reference: <https://www.babergh.gov.uk/assets/Environment/Climate-Change-Task-Force/Climate-Change-Task-Force-Terms-of-Reference-web-version-Nov-2019.pdf>.

¹⁴⁰ Suffolk Climate Change Partnership (2017) Suffolk Climate Action Plan: Fostering business and community resilience, reducing carbon emission and increasing local economic growth: <http://www.greensuffolk.org/assets/Greenest-County/SCCP/Climate-Change/Suffolk-Climate-Action-Plan-3.pdf>.

¹⁴¹ Department for Business, Energy & Industrial Strategy (2017) UK local authority carbon dioxide emission estimates: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/812139/Local_authority_2017_greenhouse_gas_emissions_statistical_release.pdf.

2005, total emissions were 45 Mt CO₂ (Metric Tons of Carbon Dioxide) and in 2017 total emission were 33 Mt CO₂¹⁴².

Table 7.1: Carbon dioxide emissions in Babergh and Mid Suffolk Districts (shown as kilo tonnes)

Year	Industrial and Commercial	Domestic	Transport	Total
Babergh				
2005	231.80	227.80	257.50	904.20
2017	151.80	140.90	258.00	567.70
% of total (2017)	27%	25%	45%	
Change (2005-2017)	-35%	-38%	+0.2%	-37%
Mid Suffolk				
2005	332.20	245.90	305.10	863.70
2017	214.10	151.20	301.90	640.00
% of total (2017)	33%	24%	47%	
Change (2005-2017)	-36%	-39%	-%	-26%

Climate Change Adaptation

7.33 The Met Office has released the UK Climate Projections 2018 study (UKCP18), which provides up to date information on how the climate of the UK is expected to change in the period to the end of the 21st Century. In the highest emissions scenario, summer temperatures in the UK could be 5.4°C warmer by 2070 than the average summer between 1981 and 2000. Average summer rainfall would fall by 47% in this scenario. Winters could be up to 4.2°C warmer, with up to 25% more rainfall by 2070.

7.34 Changes to the climate will bring new challenges to BMSDC's natural environments. Hotter, drier summers may have adverse health impacts and may exacerbate the adverse environmental effects of air and water pollution. Warmer, wetter winters could lead to more frequent and severe flooding events, both from watercourses breaching their banks and from surface water run-off and rising groundwater.

7.35 Figure 7.1 shows Flood Risk Zones 2 and 3 in the Districts, which are those areas at greatest risk of flooding from either rivers or the sea.

7.36 A changing climate may place pressure on some native species and create conditions suitable for new species, including invasive non-native species. Protection and enhancement of the natural landscape is critical to mitigating and adapting to climate change given its significant role in carbon sequestration, flood storage/management and maintaining water quality.

7.37 The Councils also aim to help the Government deliver the 25-year Environment Plan and help increase the powers and resources available to local authorities to address climate change¹⁴³.

Key sustainability issues

7.38 The key sustainability issues for climate change adaptation and mitigation, and their likely evolution without the JLP are shown in **Table 7.2**.

¹⁴² Department for Business, Energy & Industrial Strategy (2017) UK local authority carbon dioxide emission estimates: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/812139/Local_authority_2017_greenhouse_gas_emissions_statistical_release.pdf.

¹⁴³ BMSDC (2020) Climate Declaration: <https://www.babergh.gov.uk/news/councils-support-2030-carbon-neutral-ambitions/>.

Table 7.2: Key sustainability issues and likely evolution without the Joint Local Plan

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA Objectives
While carbon emissions from all sectors have fallen in both districts since 2005, BMSDC's emissions are still above the national and regional averages. There has also been very little progress on transport emissions. Both Councils have committed to meeting net zero by 2030 at the latest, and to meet this will need to make significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure.	<p>Policy CS12 (Sustainable Design and Construction Standards) in Babergh's Core Strategy (2014) states that larger scale residential developments will be expected to achieve the Building For Life Silver Standard, whilst non-residential developments are expected to achieve a minimum BREEAM standard of 'Excellent'. Policy CS13 (Renewable/Low Carbon Energy) also requires new development to minimise dependence on fossil fuels and make the fullest contribution to the mitigation of climate change through adopting a sustainable approach to energy use. Large-scale development proposals will be required to use on-site renewable, decentralised, or low carbon energy sources with the aim of achieving a 10% reduction in the predicted carbon dioxide emissions of the development. Likewise, Policy CS15 (Implementing Sustainable Development in Babergh) expects development to address climate change through design, adaptation, mitigation and by incorporating or producing sources of renewable or low-carbon energy. With regard to transport, Saved Policies TP04-TP19 in the Babergh Local Plan Alteration No. 2 (2006) are relevant.</p> <p>Policy CS2 (Reduce Contributions to Climate Change) in Mid Suffolk's Core Strategy (2008) states that the Council will promote and encourage the appropriate development of standalone Renewable Energy schemes, in addition to sustainable construction techniques. With regard to transport, Policy CS6 (Services and Infrastructure) states that local contributions for which infrastructure contributions may be sought include improvements in public transport and improvements to pedestrian and cycle routes.</p> <p>Without the JLP, sustainable design and renewable energy schemes would continue to be implemented in the existing plan period. Babergh's most up-to-date document in the Local Plan, the Core Strategy, covers the period up to 2031, whilst Mid Suffolk's Core Strategy covers the period up to 2026. The JLP provides an opportunity to strengthen policies which act positively in terms of climate change, especially those that limit the need to travel through the appropriate siting and design of new development.</p>	SA Objectives 9 and 16.
The effects of climate change in BMSDC is likely to result in extreme weather events (e.g. intense rainfall, prolonged high temperatures and drought) becoming more common and more intense.	<p>Policy CS12 (Sustainable Design and Construction Standards) in Babergh's Core Strategy (2014) and Policy CS2 (Reduce Contributions to Climate Change) in Mid Suffolk's Core Strategy (2008) require new development to adapt to climate change through sustainable design and construction techniques. Policy CS15 (Implementing Sustainable Development in Babergh) in Babergh's Core Strategy also states that development should mitigate the impacts of climate change, such as enhancing natural cooling to reduce the heat island effect, providing pollution sequestration for the absorption of greenhouse gases and the implementation of sustainable drainage systems (SUDs).</p> <p>Without the JLP, extreme weather effects will still take place. However, the JLP provides an opportunity to build upon the approach of current policy to better respond to developing circumstances as evidence and techniques develop.</p>	SA Objective 9.
BMSDC will need to become more resilient to the increased risk of flooding as a result of climate change.	<p>Policy CS15 (Implementing Sustainable Development in Babergh) in Babergh's Core Strategy (2014) encourages the provision of flood water storage areas and sustainable drainage systems.</p> <p>Policy CS4 (Adapting to Climate Change) states that the Council will support development proposals that avoid areas of current and future flood risk, and which do not increase flooding elsewhere, adopting a precautionary principle to development proposals. Saved Policies CL4 (Protecting the river valleys and flood plains) and SC5 (Areas at risk of flooding) are also relevant.</p> <p>Without the emerging JLP, flooding will still take place but it is likely that development will continue to be located away from areas at high risk of flooding. The JLP provides an opportunity, alongside national measures, to mitigate the effects of potential future flooding through appropriate siting of development and flood resilient design.</p>	SA Objectives 9 and 10.

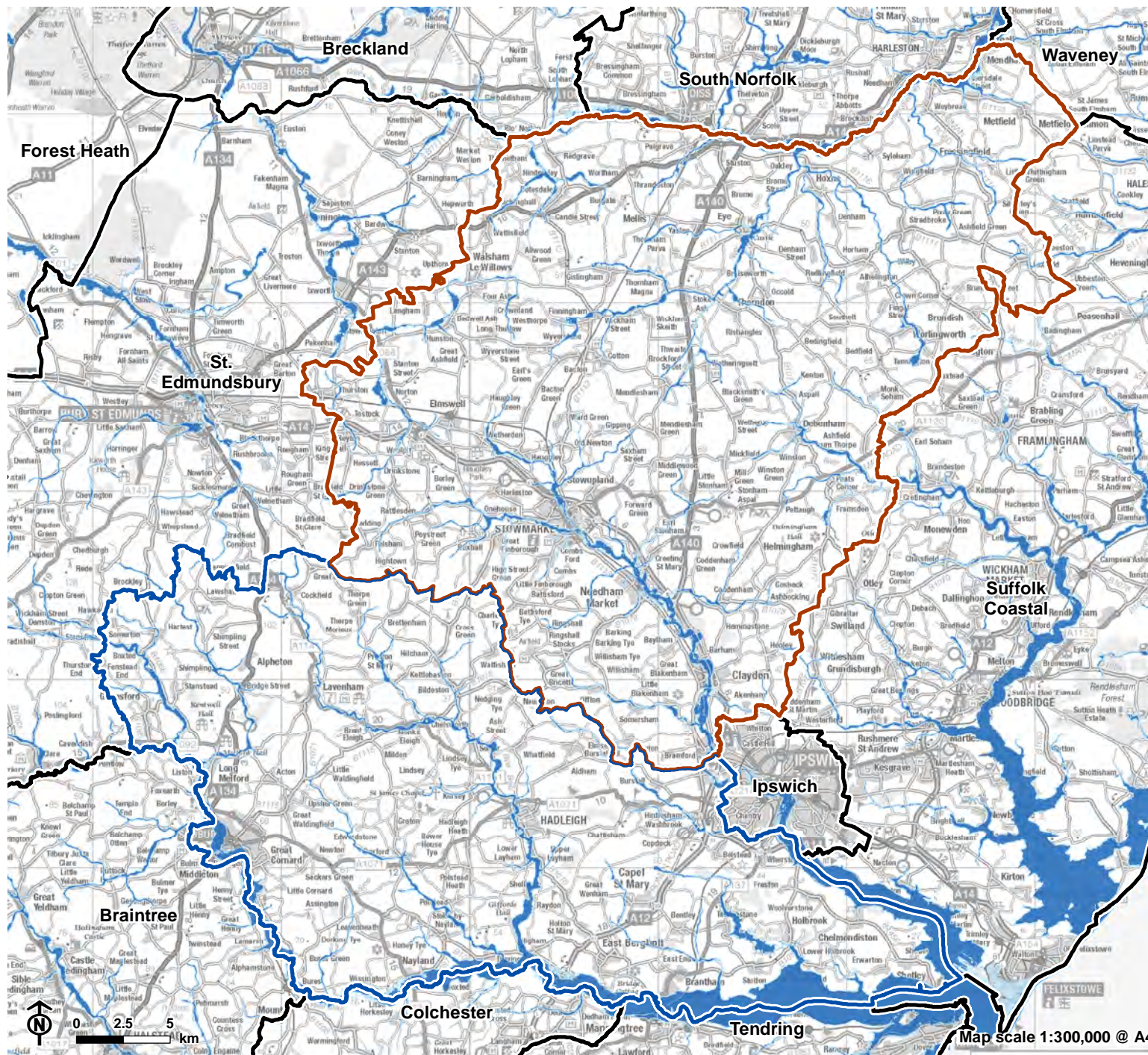


Figure 7.1: Flood Risk (Flood Zones 2 and 3)

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- Flood zone 2
- Flood zone 3

Chapter 8

Biodiversity

Policy context

International

8.1 International Convention on Wetlands (Ramsar Convention) (1976)¹⁴⁴: International agreement with the aim of conserving and managing the use of wetlands and their resources.

8.2 European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979)¹⁴⁵: Aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

8.3 International Convention on Biological Diversity (1992)¹⁴⁶: International commitment to biodiversity conservation through national strategies and action plans.

8.4 European Habitats Directive (1992)¹⁴⁷: Together with the Birds Directive, the Habitats Directive sets the standard for nature conservation across the EU and enables all 27 Member States to work together within the same strong legislative framework in order to protect the most vulnerable species and habitat types across their entire natural range within the EU. It also established the Natura 2000 network.

8.5 European Birds Directive (2009)¹⁴⁸: Requires the maintenance of all species of naturally occurring birds in the wild state in the European territory at a level which corresponds in particular to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements.

8.6 United Nations Declaration on Forests (New York Declaration) (2014)¹⁴⁹: international commitment to cut natural forest loss by 2020 and end loss by 2030.

¹⁴⁴ United Nations (1976) http://portal.unesco.org/en/ev.php-URL_ID=15398&URL_DO=DO_TOPIC&URL_SECTION=201.html.

¹⁴⁵ Council of Europe (1979) Convention on Wetlands of International Importance especially as Waterfowl Habitat: <https://www.coe.int/en/web/conventions/full-list/-/conventions/rms/0900001680078aff>.

¹⁴⁶ United Nations (1992) Convention on the Conservation of European Wildlife and Natural Habitats: <https://www.cbd.int/doc/legal/cbd-en.pdf>.

¹⁴⁷ European Commission (1992) European Habitats Directive: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31992L0043&from=EN>.

¹⁴⁸ European Commission (2009) European Birds Directive: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32009L0147&from=EN>.

¹⁴⁹ United Nations (2014) Declaration on Forests (New York Declaration): https://www.unep.org/content/dam/unep/library/Environment%20and%20Energy/Forests/New%20York%20Declaration%20on%20Forests_DAA.pdf.

National

8.7 National Planning Policy Framework (NPPF)¹⁵⁰:

Encourages plans to “identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation”. Plans should also promote conservation, restoration and enhancement of priority habitats and species, ecological networks and measurable net gains for biodiversity.

8.8 The NPPF states that a strategic approach to maintaining and enhancing networks of habitats and green infrastructure is also to be supported through planning policies and that there should also be support for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

8.9 National Planning Practice Guidance (PPG)¹⁵¹:

Supports the NPPF by requiring Local Plans to include strategic policies that conserve and enhance the natural environment through sustainable development.

8.10 Natural Environment and Rural Communities Act 2006¹⁵²: Places a duty on public bodies to conserve biodiversity.

8.11 Biodiversity 2020: A strategy for England's wildlife and ecosystem services¹⁵³: Guides conservation efforts in England up to 2020 by requiring a national halt to biodiversity loss, supporting healthy ecosystems and establishing ecological networks. The Strategy includes 22 priorities which include actions for the following sectors: Agriculture, Forestry, Planning & Development, Water Management, Marine Management, Fisheries, Air Pollution and Invasive Non-Native Species.

8.12 Biodiversity offsetting in England Green Paper¹⁵⁴: Biodiversity offsets are conservation activities designed to compensate for residual losses. The Green Paper sets out a framework for offsetting.

8.13 A Green Future: Our 25 Year Plan to Improve the Environment (2018)¹⁵⁵:

Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: recovering nature and enhancing the beauty of landscapes; securing clean, productive and biologically diverse seas and oceans; and protecting and improving our global environment. Actions that will be taken as part of these three key areas are as follows:

- Recovering nature and enhancing the beauty of landscapes:
 - Develop a Nature Recovery Network to protect and restore wildlife and provide opportunities to re-introduce species that have been lost from the countryside.
- Securing clean, healthy, productive and biologically diverse seas and oceans:
 - Achieve a good environmental status of the UK's seas while allowing marine industries to thrive and complete our economically coherent network of well-managed marine protected areas.
- Protecting and improving our global environment:
 - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.
 - Support and protect international forests and sustainable agriculture.

Sub-national

8.14 Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy – Technical Report (2019)¹⁵⁶:

Sets out a strategy for sustainable housing growth whilst also adequately protecting European wildlife sites from harm.

8.15 In July 2019 Mid Suffolk District Council pledged to help protect existing wildlife and biodiversity in the District¹⁵⁷. This

¹⁵⁰ Ministry of Housing, Communities & Local Government (last updated 19 June 2019) National Planning Policy Framework: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf.

¹⁵¹ Ministry of Housing, Communities and Local Government (last updated 1 October 2019) Planning Practice Guidance: <https://www.gov.uk/government/collections/planning-practice-guidance>.

¹⁵² HM Government (2006) Natural Environment and Rural Communities Act 2006: http://www.legislation.gov.uk/ukpga/2006/16/pdfs/ukpga_20060016_en.pdf.

¹⁵³ Department for Environment, Food and Rural Affairs (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf.

¹⁵⁴ Department for Environment, Food and Rural Affairs (2013) Biodiversity offsetting in England Green Paper: https://consult.defra.gov.uk/biodiversity/biodiversity_offsetting/supporting_documents/20130903Biodiversity%20offsetting%20green%20paper.pdf.

¹⁵⁵ HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf.

¹⁵⁶ Footprint Ecology (2019) Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy: <http://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf>.

¹⁵⁷ BMSDC (2019) Council takes steps to protect wildlife: <https://www.midsuffolk.gov.uk/news/council-takes-steps-to-protect-wildlife/>.

will start with a review of existing potential wildlife corridors in the District and examining ways in which the corridors can be enhanced, working as part of the climate change taskforce.

8.16 In September 2019 Babergh District Council pledged to protect wildlife, biodiversity and natural habitats which included wildflower verges and free trees for families, in addition to producing a map showing Babergh's wildlife networks¹⁵⁸.

8.17 The Climate Change Task Force mentioned earlier focuses biodiversity, as well as climate change mitigation. The Task Force considers ways in which both the Councils and partnerships can protect and improve the environment and biodiversity. This includes considering actions through their own operations and key stakeholders or partners.

8.18 Babergh and Mid Suffolk also provide details of national ecological guidance on their website, such as construction near protected areas and wildlife and protected species guidance.

Current baseline

8.19 There is a need to maintain and develop BSDC's network of high-quality habitats. In Babergh District are the Orwell and Stour estuaries, which are found on the eastern and south-eastern sides of the District. They have valued wildlife habitats and a distinct character. Both estuaries are Ramsar sites, designated for their international importance as wetlands under the Ramsar Convention and also Special Protection Areas which are European designations, with respect to internationally important populations of birds.

8.20 Both Districts contain 41 Sites of Special Scientific Interest (SSSI), one National Nature Reserve (Redgrave & Lopham Fen in Mid Suffolk District), 438 County Wildlife Sites¹⁵⁹ and 24 Local Nature Reserves¹⁶⁰. The designated biodiversity sites are shown in **Figure 8.1**. Ancient Woodland is also present across both Districts (**Figure 8.2**).

8.21 Out of the 41 SSSIs, five of them are known for their geological significance. BMSDC also contains two Regionally Important Geological/Geomorphological Sites (RIGS) (see **Chapter 6** for more information). Out of the 41 SSSIs, 15 of

them are entirely in favourable condition whereas the remainder are not. Out of the 26 SSSIs that are in unfavourable condition, the following SSSIs were found to be partly or entirely within unfavourable condition and declining¹⁶¹:

- **Cornard Mere, Little Cornard SSSI:** 100% of this SSSI is in unfavourable condition and declining.
- **Creeping St. Mary Pits SSSI:** 42.51% of this SSSI is partially destroyed whereas the remainder is in favourable condition.
- **Freston and Cutler's Wood with Holbrook Park SSSI:** This entire SSSI is in unfavourable condition. 8.67% of the SSSI is declining and 61.23% of the SSSI is recovering. There has been no change across the remainder of the SSSI.
- **Gosbeck Wood SSSI:** This Entire SSSI is in unfavourable condition and declining.
- **Hoxne Brick Pit SSSI:** 30.62% of this SSSI is in unfavourable condition and declining, whilst the remainder of the site is in favourable condition and recovering.
- **Kentwell Woods SSSI:** Around 75% of this SSSI is in unfavourable condition with 13.10% declining, 20.23% where there has been no change and 41.52% of which is recovering. The remaining 25% of the site is in favourable condition.
- **Orwell Estuary SSSI:** 11.78% of this SSSI is in unfavourable condition and declining, whilst 9.73% of the site is also in unfavourable condition but there has been no change. The remainder of the site is in favourable condition.
- **Stour Estuary SSSI:** 1.99% of this SSSI is in unfavourable condition and declining, whilst the remainder of the site is in favourable condition.

Key sustainability issues

8.22 The key sustainability issues for biodiversity, and their likely evolution without the JLP are shown in **Table 8.1**.

¹⁵⁸ BMSDC (2019) <https://www.babergh.gov.uk/news/babergh-pledges-to-protect-wildlife/>

¹⁵⁹ County Wildlife Sites (CWSs) have been identified throughout Suffolk and range from small meadows, green lanes, dykes and hedges to much larger areas of ancient woodland, heathland, greens, commons and marsh. CWSs complement statutorily protected areas and nature reserves (such as SSSIs and

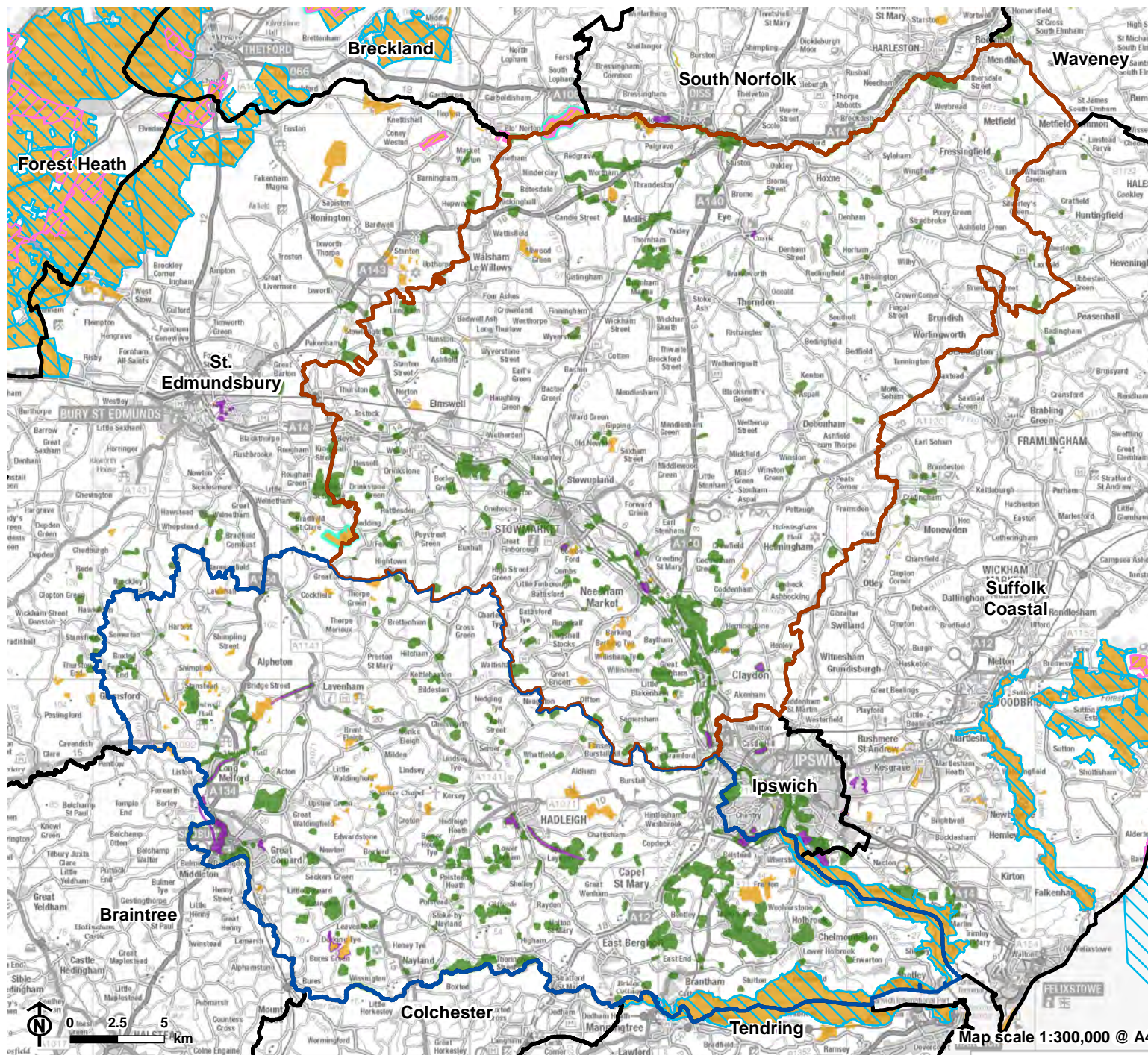
Local and National Nature Reserves) by helping to maintain habitat links between these sites.

¹⁶⁰ The Local Nature Reserves are statutory designations which have wildlife or geological features that are of special interest to the local area.

¹⁶¹ Natural England (2020) Designated Sites View: <https://designatedsites.naturalengland.org.uk/SiteSearch.aspx>.

Table 8.1: Key sustainability issues and likely evolution without the Joint Local Plan

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA Objectives
BMSDC contains and is in close proximity to a number of both designated and non-designated natural habitats and biodiversity. This includes those designated for their national and international importance. Not all SSSIs are in favourable condition.	<p>Policy CS14 (Green Infrastructure) in Babergh's Core Strategy (2014) seeks to protect and enhance green infrastructure, whilst Policy CS15 (Implementing Sustainable Development) states that development must protect and enhance biodiversity and create open, green spaces where appropriate.</p> <p>Policy CS5 (Mid Suffolk's Environment in Mid Suffolk's Core Strategy (2008) states that development must protect, manage and enhance Mid Suffolk's biodiversity and geodiversity and where appropriate increase opportunities for access and appreciation of biodiversity. Saved Policies CL5-C11 in Mid Suffolk's Local Plan (1998) are also relevant.</p> <p>Without the JLP, pressures on biodiversity assets if likely to continue due to ongoing pressure for further development and growth. The JLP presents an opportunity for new development to come forward at the most appropriate locations in order to avoid detrimental impacts on biodiversity assets, as well as up to date planning policy in relation to future policy direction such as biodiversity net gain.</p>	SA Objective11.
Although designated sites represent the most valued habitats in the plan area, the overall ecological network is also important for biodiversity as a whole and helps to support the health of designated sites, allowing species to migrate in response to climate change. The fragmentation and erosion of habitats and the wider ecological network in BMSDC is an ongoing threat to biodiversity.	<p>Policy CS14 (Green Infrastructure) in Babergh's Core Strategy (2014) seeks to protect and enhance green infrastructure, whilst Policy CS15 (Implementing Sustainable Development) states that development must protect and enhance biodiversity and create open, green spaces where appropriate.</p> <p>Policy CS5 (Mid Suffolk's Environment in Mid Suffolk's Core Strategy (2008) states that development must protect, manage and enhance Mid Suffolk's biodiversity and geodiversity and where appropriate increase opportunities for access and appreciation of biodiversity. Saved Policies CL5-C11 in Mid Suffolk's Local Plan (1998) are also relevant.</p> <p>Without the JLP, erosion and fragmentation of habitats and ecological networks could take place through poorly located and designed development. The NPPF requires Local Plans to include policies to safeguard, restore and create ecological networks at a landscape scale. The JLP provides the opportunity to further promote biodiversity gain and to improve the overall ecological network.</p>	SA Objective 11.



**Figure 8.1: Designated Biodiversity
Assets**

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- Special Protection Area
- Special Area of Conservation
- Site of Special Scientific Interest
- National Nature Reserve
- Local Nature Reserve
- County Wildlife Site

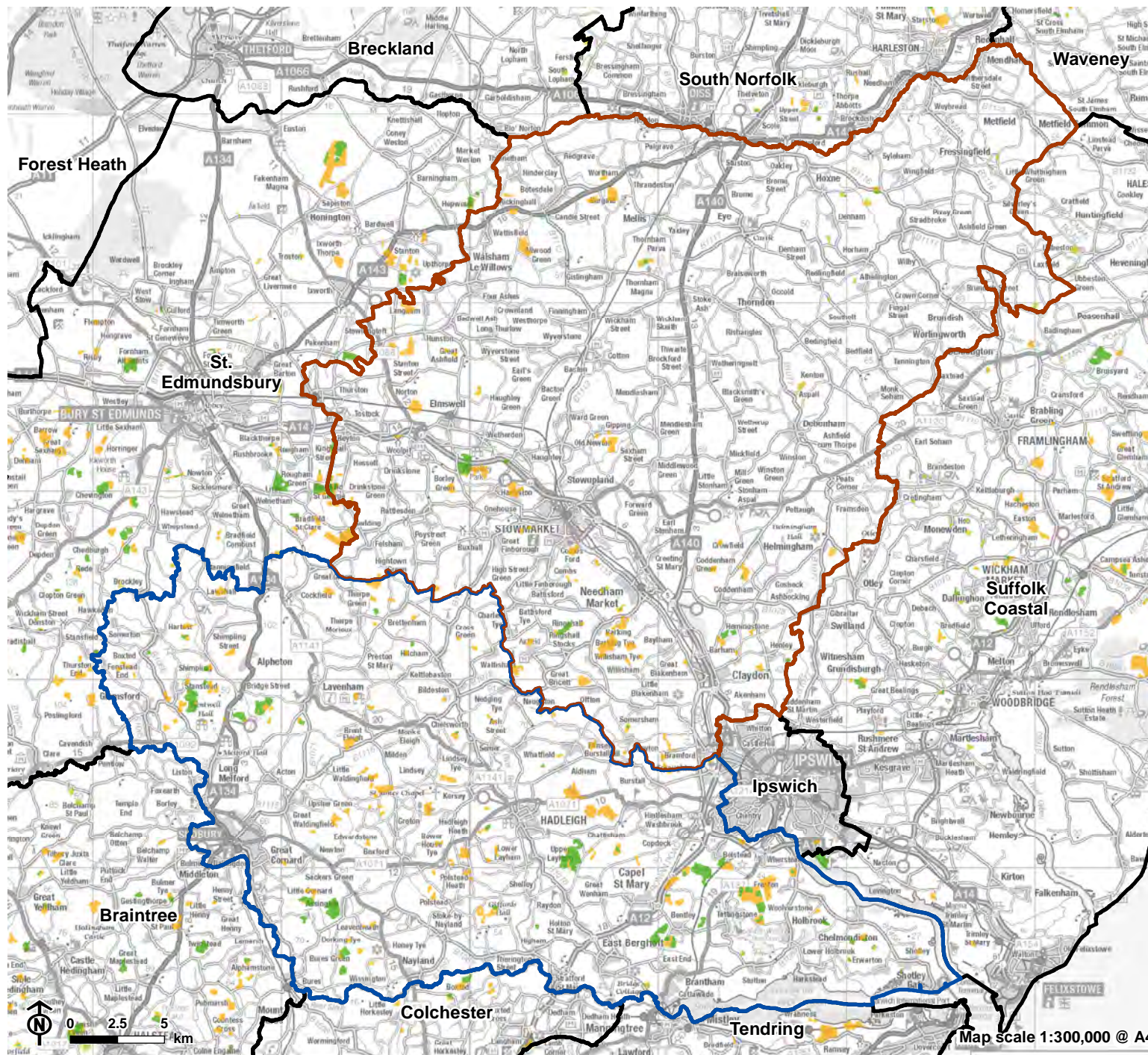


Figure 8.2: Ancient Woodland Inventory

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- Ancient Woodland Inventory**
- Ancient & Semi-Natural Woodland
- Ancient Replanted Woodland

Chapter 9

Historic Environment

Policy context

International

9.1 European Convention for the Protection of the Architectural Heritage of Europe (1985)¹⁶²: Defines "architectural heritage" and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention.

9.2 Valletta Treaty (1992) formerly the European Convention on the Protection of the Archaeological Heritage (Revisited)¹⁶³: Aims to protect the European archaeological heritage "as a source of European collective memory and as an instrument for historical and scientific study".

National

9.3 Ancient Monuments & Archaeological Areas Act 1979¹⁶⁴: a law passed by the UK government to protect the archaeological heritage of England & Wales and Scotland. Under this Act, the Secretary of State has a duty to compile and maintain a schedule of ancient monuments of national importance, in order to help preserve them. It also creates criminal offences for unauthorised works to, or damage of, these monuments.

9.4 Planning (Listed Buildings & Conservation Areas) Act 1990¹⁶⁵: An Act of Parliament that changed the laws for granting of planning permission for building works, with a particular focus on listed buildings and conservation areas.

9.5 National Planning Policy Framework (NPPF)¹⁶⁶: Plans should "set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

¹⁶² Council of Europe (1985) European Convention for the Protection of the Architectural Heritage of Europe: <https://rm.coe.int/168007a087>.

¹⁶³ Council of Europe (1992) Valletta Treaty: <https://rm.coe.int/168007bd25>.

¹⁶⁴ HM Government (1979) Ancient Monuments & Archaeological Areas Act: <https://consult.environment-agency.gov.uk/engagement/bostonbarriertwao/results/b.21---ancient-monuments-and-archaeological-areas-act-1979.pdf>.

¹⁶⁵ HM Government (2002) Planning (Listed Buildings & Conservation Areas) Act (1990):

http://www.legislation.gov.uk/ukpga/1990/9/pdfs/ukpga_19900009_en.pdf.

¹⁶⁶ Ministry of Housing, Communities and Local Government (last updated 19 June 2019) National Planning Policy Framework:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf.

- a. the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b. the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c. the desirability of new development making a positive contribution to local character and distinctiveness; and
- d. opportunities to draw on the contribution made by the historic environment to the character of a place.”

9.6 National Planning Practice Guidance (PPG)¹⁶⁷:

Supports the NPPF by requiring that Local Plans include strategic policies for the conservation and enhancement of the historic environment, including a positive strategy for the conservation and enjoyment of the historic environment. It also states that local planning authorities should identify specific opportunities for conservation and enhancement of heritage assets.

9.7 The Government’s Statement on the Historic Environment for England 2010¹⁶⁸:

Sets out the Government’s vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life. Includes reference to promoting the role of the historic environment within the Government’s response to climate change and the wider sustainable development agenda.

9.8 The Heritage Statement 2017¹⁶⁹: Sets out how the Government will support the heritage sector and help it to protect and care for our heritage and historic environment, in order to maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

9.9 Sustainability Appraisal and Strategic Environmental Assessment Historic England Advice Note 8¹⁷⁰: Sets out Historic England’s guidance and expectations for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.

Current baseline

Heritage assets

9.10 The Districts have a range of unique historic assets, which give the Districts character and beauty¹⁷¹. These assets include Scheduled Monuments, Registered Parks and Gardens (SAMs) and a range of listed buildings (Grades I, II and II*), as shown in **Figures 9.1 and 9.2**.

9.11 In Babergh District, there are 39 Scheduled Monuments, two Registered Parks and Gardens, 88 Grade I Listed Buildings, 3,173 Grade II Listed Buildings and 188 Grade II* Listed Buildings.

9.12 In Mid Suffolk there are 35 Scheduled Monuments, five Registered Parks and Gardens, 87 Grade I Listed Buildings, 2,710 Grade II Listed Buildings and 1,889 Grade II* Listed Buildings.

9.13 A Conservation Area is defined as “an area of special architectural or historic interest, the character of which it is desirable to preserve or enhance”¹⁷². It usually consists of a historic core with a number of listed buildings. There are 60 Conservation Areas altogether in both Districts. The Councils have produced Conservation Area Appraisals, which have been adopted by the Council¹⁷³.

9.14 BMSDC’s Heritage and Settlement Sensitivity Assessment (2018) provides details on the historic landscape of the Districts. The document assesses 42 settlements which have been identified as potential areas of residential expansion. Eight of these settlements are identified as being of cumulatively high value, specifically: Boxford, Debenham, East Bergholt, Eye, Hoxne, Lavenham, Long Melford and Nayland.

Heritage assets at risk

9.15 Historic England has a Heritage at Risk Register¹⁷⁴ which includes historic buildings, sites and conservation areas at risk of being lost through neglect, deterioration or decay¹⁷⁵. The Register aims to highlight those places and buildings in greatest need of repair.

9.16 In Babergh, there are two Grade II* buildings that are at risk:

¹⁶⁷ Ministry of Housing, Communities & Local Government (last updated 1 October 2019) Planning Practice Guidance:

<https://www.gov.uk/government/collections/planning-practice-guidance>.

¹⁶⁸ HM Government (2010) The Government’s Statement on the Historic Environment for England 2010: <https://www.gov.uk/government/publications/the-governments-statement-on-the-historic-environment-for-england>.

¹⁶⁹ Department for Digital, Culture Media and Sport (2017) Heritage Statement 2017:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/664657/Heritage_Statement_2017_final_-_web_version_.pdf.

¹⁷⁰ Historic England (2016) Sustainability Appraisal and Strategic Environmental Assessment: Historic England Advice Note 8:

<https://content.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/hea036-sustainability-appraisal-strategic-environmental-assessment.pdf/>.

¹⁷¹ BMSDC (2020) Heritage: <https://www.midsuffolk.gov.uk/planning/heritage/>.

¹⁷² BMSDC (2020) Living in a Conservation Area:

<https://www.midsuffolk.gov.uk/planning/heritage/living-in-a-conservation-area/>.

¹⁷³ BMSDC (2020) Heritage:

<https://www.midsuffolk.gov.uk/planning/heritage/conservation-area-appraisals/>.

¹⁷⁴ Historic England (2019) Risk Register: <https://historicengland.org.uk/images-books/publications/har-2019-registers/ee-har-register2019/>.

¹⁷⁵ Historic England (2019) Risk Register: <https://historicengland.org.uk/images-books/publications/har-2019-registers/ee-har-register2019/>.

- **Barn north east of Bentley Hall, Bentley Hall Road, Bentley:** very bad condition.

- **Church of St Mary, Fish Pond Hill, Harkstead:** poor condition.

9.17 There are also three Scheduled Monuments in the District that are at risk:

- **Roman villa north east of Rodbridge House, Long Melford:** extensive significant problems.
- **Wissington ring ditch cluster. Nayland-with-Wissington:** extensive significant problems.
- **Wood Hall moated site, Sudbury:** generally unsatisfactory with major localised problems.

9.18 In Mid Suffolk, there are four Grade I Listed Buildings and six Grade II* listed buildings that are at risk:

- **Church of St Mary and St Laurence, The Street, Great Bricett (Grade I):** fair condition.
- **Church of St Mary, Hall Lane, Nettlestead (Grade I):** poor condition.
- **Church of St Margaret, Little Green, Thrandeston (Grade I):** poor condition.
- **Church of St Mary, Church Lane, Yaxley (Grade I):** very bad condition.
- **Badley Hall barn 100 metres south east of Badley Hall, Badley (Grade II*):** poor condition.
- **Badley Hall dovecote 60 metres east of Badley Hall, Badley (Grade II*):** poor condition.

- **Poplar Farmhouse, Brome and Oakley (Grade II*):** very bad condition.

- **Barn 200 metres west of Hall's Farmhouse, Halls Lane, Norton (Grade II*):** poor condition.

- **Church of St Mary, The Street, Horham (Grade II*):** poor condition.

- **Church of All Saints, Church Street, Stadbroke (Grade II*):** very bad condition.

- **Church of All Saints, Church Lane, Stuston (Grade II*):** very bad condition.

9.19 Furthermore, there are 2 Scheduled Monuments in the District that are at risk:

- **Barn at Rook Hall, Eye:** very bad condition.
- **Baylham Roman site, Coddtenham:** extensive significant problems.

9.20 Finally, there is a Registered Park and Garden (Grade I) with 22 listed buildings that partially falls within a Conservation Area. It is generally unsatisfactory with major localised problems.

9.21 The heritage assets at risk are shown in **Figure 9.3**.

Key sustainability issues

9.22 The key sustainability issues for the historic environment, and their likely evolution without the JLP are shown in **Table 9.1**.

Table 9.1: Key sustainability issues and likely evolution without the Joint Local Plan

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA Objectives
There are many sites, features and areas of historical and cultural interest in the plan area, a number of which are identified on the Heritage at Risk register. In the context of significant ongoing pressures for development locally, these assets, and their landscape setting, may be at risk from adverse effects from poorly located or designed development.	<p>Policy CS11 (Strategy for Development for Core and Hinterland Villages) in Babergh's Core Strategy (2014) states that development in Core and Hinterland Villages will be approved where appropriate to the landscape, environmental and heritage characteristics of the village. Likewise, Policy CS15 (Implementing Sustainable Development in Babergh) states that development must respect heritage assets, important spaces and historic views. Saved Policies CN06-CN15 in the Babergh Local Plan Alteration No. 2 (2006) are relevant.</p> <p>Policy CS5 (Mid Suffolk's Environment) in Mid Suffolk's Core Strategy (2008) requires development to respect the local distinctiveness and the built heritage of Mid Suffolk. Saved Policies HB1-HB14 in Mid Suffolk's Local Plan (1998) are also relevant.</p> <p>Without the JLP, it is possible that heritage assets within both Districts will be adversely affected by inappropriate development. This is because the JLP will be developed on the basis of a different baseline of expected growth, which may put these assets (including their setting) under increased pressure. The JLP offers an opportunity to limit development in more historically sensitive areas and to ensure that development does not result in adverse effects on the historic environment.</p>	SA Objective 12.

Figure 9.1: Listed Buildings



- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- ▲ Grade I listed building
- ▲ Grade II* listed building
- ▲ Grade II listed building

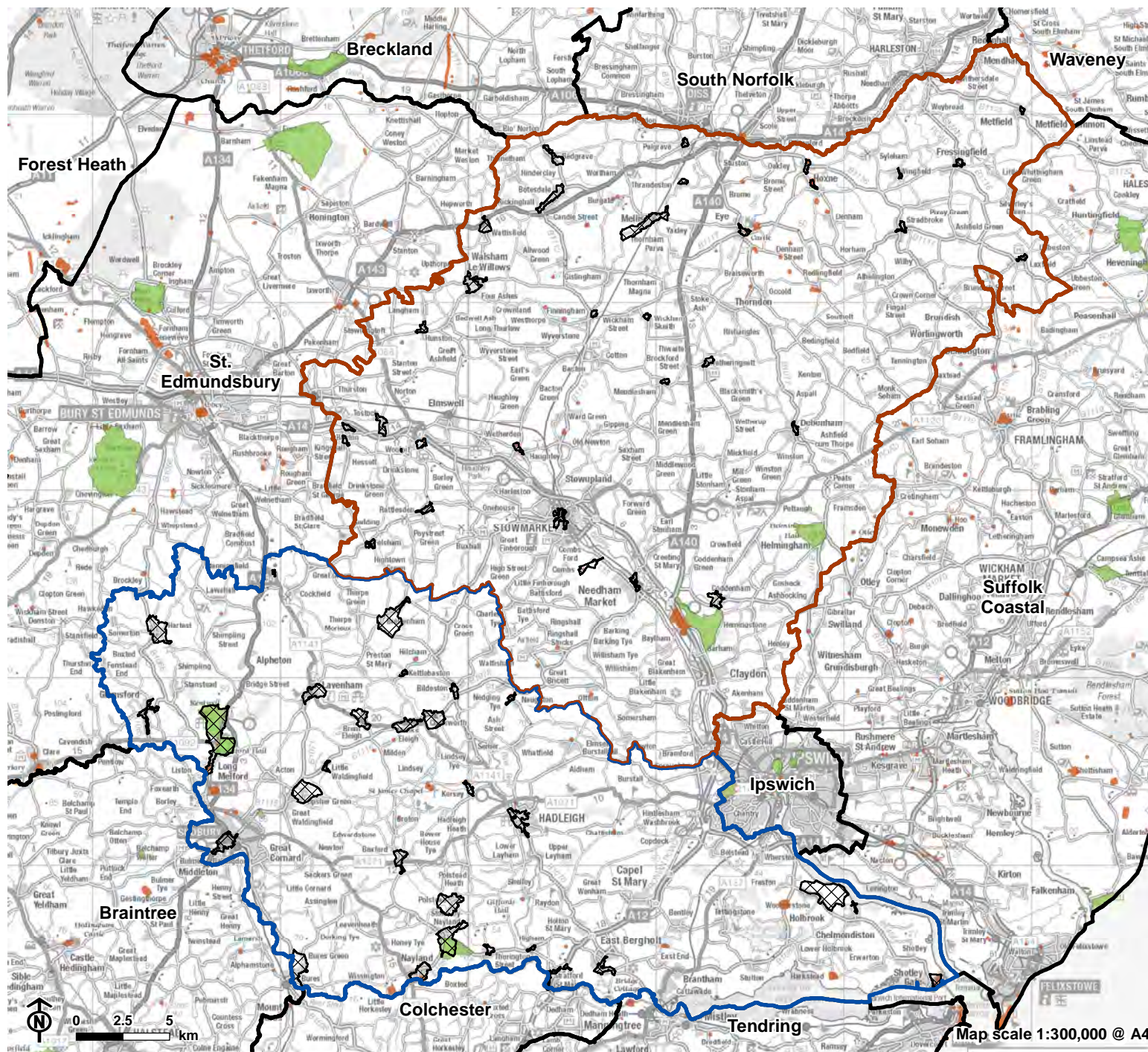


Figure 9.2: Heritage Assets

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- Conservation area
- Scheduled monument
- Registered park and garden

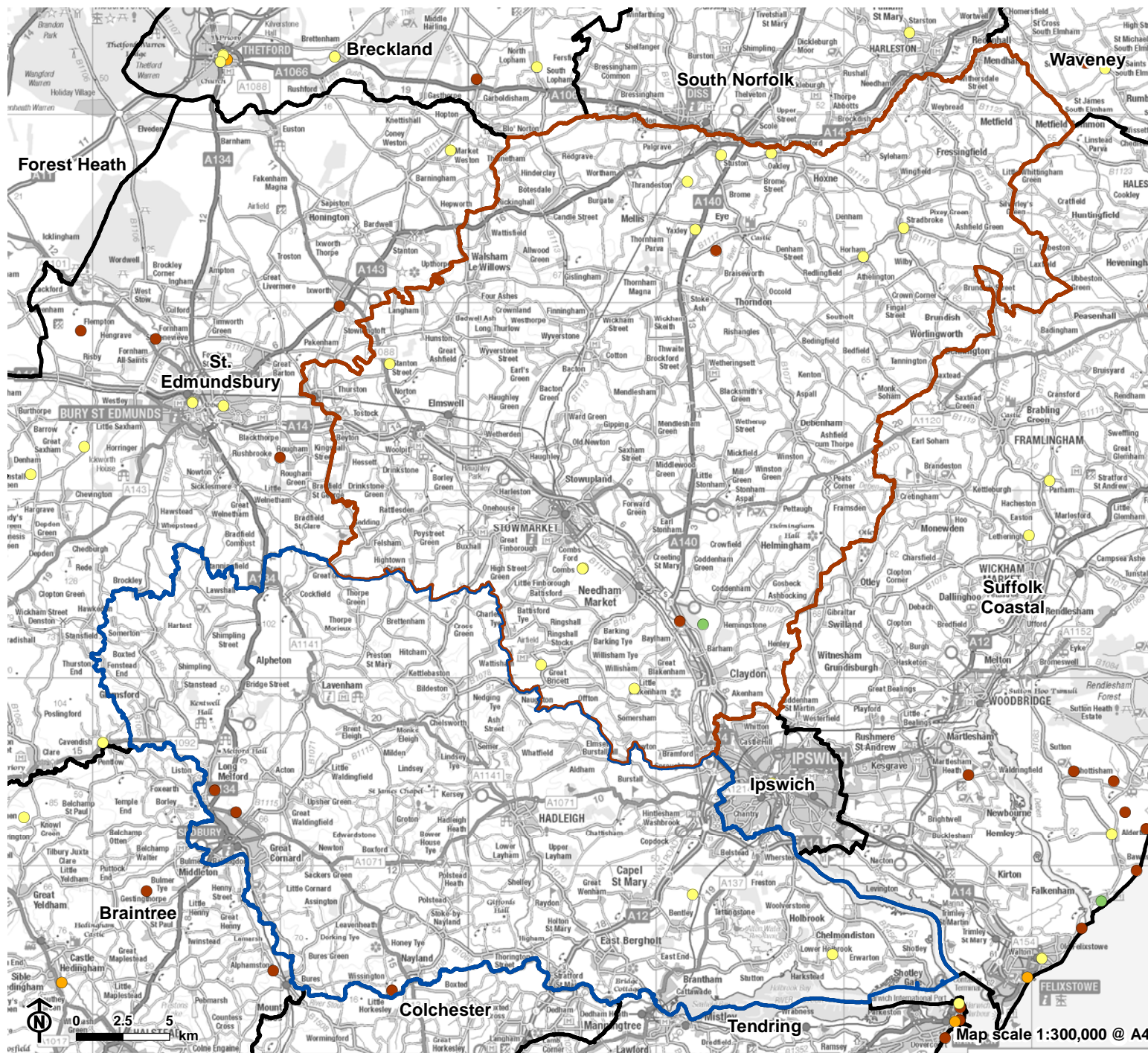


Figure 9.3: Heritage Assets at Risk

- Babergh District
- Mid Suffolk District
- Neighbouring local authority

Heritage at risk

- Conservation area
- Listed building
- Registered park and garden
- Scheduled monument

Chapter 10

Landscape

Policy Context

International

10.1 European Landscape Convention (2002)¹⁷⁶: Promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

National

10.2 National Planning Policy Framework (NPPF)¹⁷⁷: Planning principles include:

- Recognising the intrinsic beauty and character of the countryside.
- Protecting and enhancing valued landscapes. Development should be sympathetic to local character and history, including the surrounding built environment and landscape setting.
- Conserve and enhance landscape and scenic beauty in National Parks, The Broads and Areas of Outstanding Natural Beauty.

10.3 A Green Future: Our 25 Year Plan to Improve the Environment¹⁷⁸: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: recovering nature and enhancing the beauty of landscapes. Actions that will be taken as part of this key area are as follows:

- Working with AONB authorities to deliver environmental enhancements.
- Identifying opportunities for environmental enhancement of all England's Natural Character Areas, and monitoring indicators of landscape character and quality.

¹⁷⁶ Council of Europe (2000) European Landscape Convention: <https://rm.coe.int/1680080621>

¹⁷⁷ Ministry of Housing, Communities and Local Government (last updated 19 June 2019) National Planning Policy Framework: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf.

¹⁷⁸ HM Government (2018) A Green Future: Our 23 Year Plan to Improve the Environment: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf.

Sub-national

10.4 Joint Babergh & Mid Suffolk Landscape Character Guidance (2015)¹⁷⁹: Provides guidance to outline the main elements of the existing character, as well as the broad principles that all development in the countryside will have to follow. The guidance aims to help retain and enhance valuable landscape characteristics that are important to Babergh and Mid Suffolk, while also encouraging developments in appropriate locations with good design leading to sustainable economic benefits.

10.5 Dedham Vale AONB Management Plan 2016-2021¹⁸⁰: The plan sets out the management objectives for the area which have been agreed with the relevant Local Authorities and organisations involved with the project's partnership. It aims to conserve and enhance natural beauty with secondary purposes to meet the needs of recreation, safeguarding agriculture, forestry and other rural industries.

10.6 Suffolk Coast & Heaths AONB Management Plan 2018-2023¹⁸¹: The management plan has five objectives that focus on different topics such as landscape, coast and estuaries, land use and wildlife, enjoying the area and working together. It sets out a vision for the area and aims to conserve and enhance the area.

Current baseline

10.7 In Babergh District, there are two Areas of Outstanding Natural Beauty (AONB): Dedham Vale and Suffolk Coast & Heaths, both located in the south and south-east of the District, respectively, as shown in **Figure 10.1**. In February 2019, Notice was given that Natural England propose to make an Order extending the Suffolk Coast & Heaths AONB. They are now awaiting confirmation of the Order from the Secretary of State.

10.8 National Character Area (NCA) profiles created by Natural England are used to define the specific combination of landscape, geodiversity, biodiversity, history, culture and economic activity in an area. NCAs follow natural lines in the landscape instead of administrative boundaries¹⁸². The National Character Areas are shown in **Figure 10.2**.

10.9 Babergh runs through the NCAs Suffolk Coast and Heaths (82) and South Suffolk and North Essex Clayland (86)¹⁸³. Mid Suffolk runs through the NCAs South Norfolk and

High Suffolk Claylands (83) and South Suffolk and North Essex Clayland (86).

10.10 Suffolk Coast and Heaths (82) is found in the south-east of Babergh District covering Shotley Gate, Pin Mill and Holbrook. This NCA is one of the driest parts of the country, with local rainfall typically only two thirds of the national average. The underlying geology shaped by the effects of the sea and interactions of people have created the distinctive landscape character. The majority of the NCA is flat or gently rolling and often open with a few viewpoints. Wildlife habitats and landscape features are found in close proximity in many places, especially near the coast, which provide great diversity in a small area. This NCA also contains part of Dedham Vale Area of Outstanding Natural Beauty (AONB).

10.11 South Norfolk and High Suffolk Claylands (83) is found in the north of Mid Suffolk District. The High Suffolk Claylands is a high predominately flat clay plateau which dominates the area of the NCA and is dissected by a small number of small-scale wooded river valleys with complex slopes. The underlying geology is chalk and this the principal aquifer. Shallow marine deposits are overlain with glacial till, buried river gravels, lake sediments and finally bands of glacial outwash deposits.

10.12 South Suffolk and North Essex Clayland (86) is found in the north, north-west and south of Babergh District. The landscape is ancient with wooded arable countryside and a distinct sense of closure. The NCA is mainly gently undulating with chalky boulder clay plateau. The undulations are caused by numerous small-scale river valleys that cut through the plateau. Old species-rich hedgerows, ancient woodlands, parklands and meadows with streams and rivers flow eastwards. Despite field enlargements in the second half of the 20th century, there are still traditional irregular field patterns over much of the area. The moderately fertile soils are chalky clay and give the vegetation a more or less calcareous character. In addition, there are gravel and sand deposits under the clay which is an important geological feature that is often exposed during mineral extraction.

10.13 The NCA profiles indicate the drivers for change as well as the opportunities for environmental improvement. Typical drivers of change include development pressure, noise and light pollution, recreational pressure, changes in farming practices and intensive agriculture, mineral extraction,

¹⁷⁹ BMSDC (2015) Landscape Guidance: <https://www.babergh.gov.uk/assets/DM-Planning-Uploads/Joint-Landscape-Guidance-Aug-2015.pdf>.

¹⁸⁰ Dedham Vale Area of Outstanding Natural Beauty (AONB) and Stour Valley (2016) Dedham Vale Area of Outstanding Natural Beauty (AONB) and Stour Valley Management Plan 2016-2021: <http://www.dedhamvalestourvalley.org/assets/About-Us/Man-Plan-consultation/AONB-Management-Plan-web.pdf>.

¹⁸¹ Suffolk Coast & Heaths Area of Outstanding Natural Beauty (2018) Suffolk Coast & Heaths Area of Outstanding Natural Beauty Management Plan (2018-

2023): <http://www.suffolkcoastandheaths.org/assets/About-Us/Man-Plan-Docs/2018-2023/2018-23-SCH-Management-Plan.pdf>.

¹⁸² HM Government (2014) National Character Areas: <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>.

¹⁸³ HM Government (2014) National Character Area: <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles>.

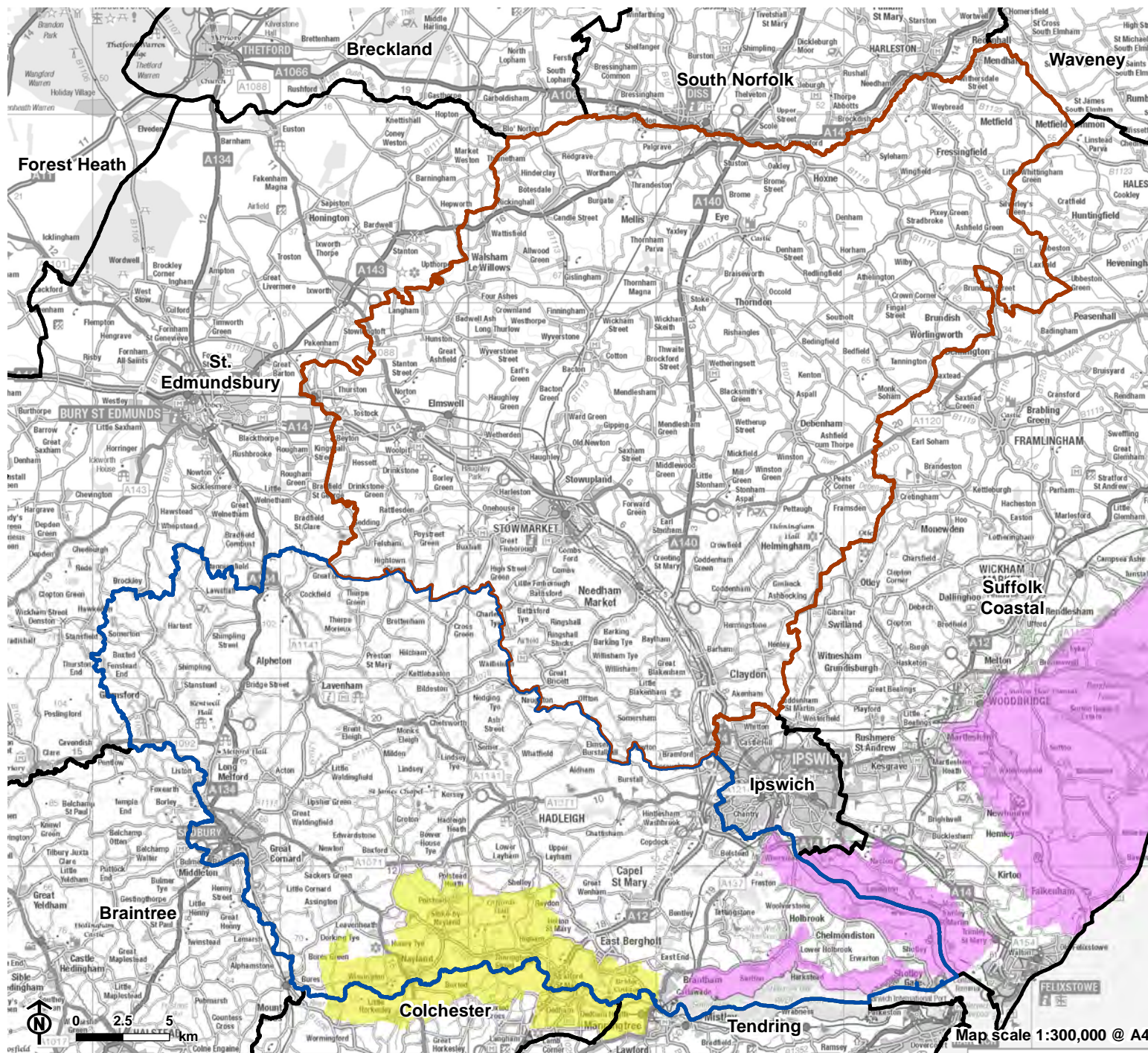
declines in biodiversity, loss or neglect of historic features, pressure on the water environment, and climate change.

Key sustainability issues

10.14 The key sustainability issues for landscape and their likely evolution without the JLP are shown in **Table 10.1**.

Table 10.1: Key sustainability issues and likely evolution without the Joint Local Plan

Key sustainability issues for Babergh and Mid Suffolk	Likely evolution without the Joint Local Plan	Relevant SA Objectives
<p>The plan area contains two AONBs and a diverse range of nationally recognised landscape character areas, all of which could be significantly harmed by inappropriate development. As well as loss of undeveloped land to development, indirect effects of development can also erode landscape character, such as noise and light pollution, recreational pressure, changes to the water environment, and pressure on habitats and biodiversity and the historic environment that contribute to landscape character.</p>	<p>Policy CS15 (Implementing Sustainable Development in Babergh) states that development should, where appropriate, respect the landscape and landscape features, whilst also making a positive contribution to the local character, shape and scale of the area. Saved Policies CR01 (Landscaping Quality), CR02 (AONB Landscape), CR04 (Special Landscape Areas), CR07 (Landscaping Schemes) and CR08 (Hedgerows) in the Babergh Local Plan Alteration No. 2 (2006) are also relevant.</p> <p>Policy CS5 (Mid Suffolk's Environment) in Mid Suffolk's Core Strategy (2008) requires all development to protect and conserve landscape qualities taking into account the natural environment and the historical dimension of the landscape as a whole rather than concentrating solely on selected areas. Saved Policy CL2 (Development within special landscape areas) in Mid Suffolk's Local Plan (1998) is also relevant.</p> <p>Without the JLP, it is likely that development could have an adverse effect on the landscape in both Districts. The JLP provides an opportunity to update the current policy position in response to the ongoing evolution of development pressures and their impact on the landscape in BMSDC.</p>	<p>SA Objective 13.</p>



**Figure 10.1: Nationally Designated
Landscapes**

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- Dedham Vale Area of Outstanding Natural Beauty
- Suffolk Coast & Heaths Area of Outstanding Natural Beauty

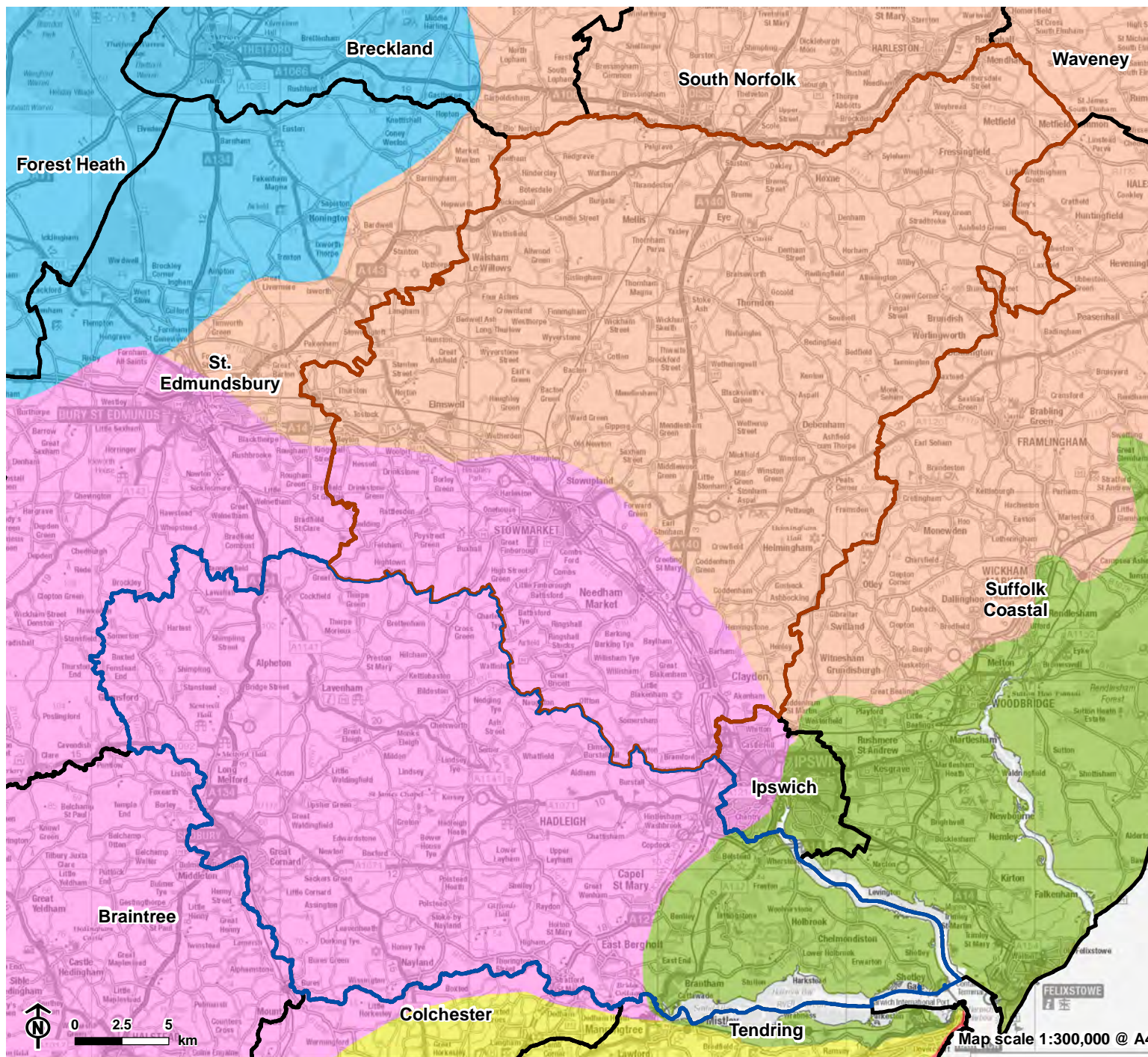


Figure 10.2: National Character Areas

- Babergh District
- Mid Suffolk District
- Neighbouring local authority
- National Character Area**
- Breckland
- Greater Thames Estuary
- Northern Thames Basin
- South Norfolk and High Suffolk Claylands
- South Suffolk and North Essex Clayland
- Suffolk Coast and Heaths

Chapter 11

The SA Framework and Method of Approach

SA Framework

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

11.2 The SA Framework for the Babergh and Mid Suffolk JLP is presented in **Table 11.1** and was originally developed by Place Services from the analysis of international, national and local policy objectives, baseline information, and key sustainability issues identified in the plan area.

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

11.4 The relationship between the Key Sustainability Issues and the SA objectives is described in the tables at the end of each of the SA topics in **Chapters 3 to 10** of this SA Scoping Report.

11.5 The relationship between the 'SEA topics', which are the specific topics that SEA is required to cover, as per Schedule 2 of the SEA Regulations, is shown in the final column of Table 11.1. It can be seen that a number of the SA objectives cut across SEA Topics, showing how inter-related many of these are.

Site Assessment Criteria and Assumptions

11.6 **Appendix B** contains the Site Assessment Criteria and Assumptions developed from the SA Framework. The Site Assessment Criteria and Assumptions will be used to establish the potential effects generated by development in site options and allocations identified for consideration by BMSDC. The performance of the sites against the site assessment criteria and assumptions will be used, alongside other technical assessments, to inform BMSDC's selection of individual site allocations.

Refinements to the SA Framework and Site Assessment Criteria and Assumptions

11.7 As a result of the review of the earlier SA work undertaken for the JLP, LUC is proposing some refinements that will be applied to the next stage of the SA process.

SA Framework

11.8 It is not proposed to amend the SA Framework, comprising the SA Objectives and Guide Questions. This is in order to maintain consistency with the previous SA work, but also because the SA Framework is, in LUC's view, robust and reflects the key sustainability issues identified for Babergh and Mid Suffolk, and covers all the SEA Topics.

Site Assessment Criteria and Assumptions

11.9 Although it is proposed to retain the SA Framework that has been used throughout the SA work to date, it is proposed to make refinements to the Site Assessment Criteria and Assumptions. The main changes to the Site Assessment Criteria and Assumptions are as follows:

- The previous Site Assessment Criteria and Assumptions recorded effects on as being either positive, negative, negligible or uncertain/unknown effects. In order to provide greater definition to the positive and negative effects, it is proposed that these are split between 'major' and 'minor' positive or negative effects. This will help to distinguish between how well potential site allocations perform against the criteria and will also assist in the identification of potentially significant effects.
- A number of the Site Assessment Criteria and Assumptions have been refined to ensure they relate more clearly to the SA Objective concerned, and to avoid duplication of assessment.
- Some of the Site Assessment Criteria and Assumptions have been refined to reflect new evidence that is currently being gathered by BMSDCs. This includes, for example, A Strategic Flood Risk Assessment, a Heritage Impact Assessment, and a Landscape Sensitivity Study.
- Some of the distance criteria by which effects will be identified as potentially occurring have been refined to reflect, first, the proposed division between 'major' and 'minor' effects and, second, to relate more closely to the guide distances set out by the Institute of Highways and Transportation which have successfully been used on SA of Local Plans elsewhere, and which have achieved adoption.

11.10 The SA Framework and Site Assessment Criteria and Assumptions are subject to change following feedback collated during consultation on this SA Scoping Report with

the three statutory consultation bodies (Environment Agency, Historic England and Natural England) under Regulation 12(5) of the SEA Regulations.

Table 11.1: SA Framework

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

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

SA Objective	Guide questions	Relevant SEA Topics
8. To promote the sustainable management of waste.	(8.1) Will it reduce household waste generated /head of population? (8.2) Will it reduce commercial and industrial waste generated /head of population? (8.3) Will it increase rate /head of population of waste reuse and recycling? / Does the proposal encourage recycling (including building materials)? (8.4) Does the proposal incorporate sustainable design and construction techniques?	Material Assets
9. To reduce contribution to climate change.	(9.1) Will it reduce emissions of greenhouse gases /head of population by reducing energy consumption? (9.2) Will it increase the proportion of energy needs being met by renewable sources? (9.3) Does the proposal incorporate renewable energy? (9.4) Does the proposal contain homes that are highly energy efficient?	Climatic Factors
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	(10.1) Will it minimise the risk of flooding to people and property from rivers and watercourses? (10.2) Will it minimise the risk of flooding to people and property on the estuary? (10.3) Will it reduce the risk of estuarine erosion? (10.4) Will it reduce the risk of damage to people and property from extreme weather events? (10.5) Does the proposal incorporate sustainable design and construction techniques? (10.6) Does the proposal ensure that buildings and public spaces are designed to respond to winter and summer temperatures, i.e. ventilation, shading and landscaping? (10.7) Does the proposal incorporate sustainable urban drainage techniques?	Water Climatic Factors Human Health Biodiversity, Flora and Fauna Material Assets
11. To conserve and enhance biodiversity and geodiversity.	(11.1) Will it maintain and enhance European designated nature conservation sites? (11.2) Will it maintain and enhance nationally designated nature conservation sites? (11.3) Will it maintain and enhance locally designated nature conservation sites? (11.4) Will it avoid disturbance or damage to protected species and their habitats? (11.5) Will it help deliver the targets and actions for habitats and species within the Suffolk Biodiversity Action Plan? (11.6) Will it help to reverse the national decline in farmland birds? (11.7) Will it protect and enhance sites, features and areas of geological value in both urban and rural areas? (11.8) Will it lead to the creation of new habitat?	Biodiversity, Flora and Fauna

SA Objective	Guide questions	Relevant SEA Topics
	(11.9) Does the proposal maintain or enhance biodiversity?	
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	(12.1) Will it protect and enhance buildings, monuments, sites, places, areas and landscapes of heritage interest or cultural value (including their setting) meriting consideration in planning decisions? (12.2) Will it protect and enhance sites, features and areas of archaeological value in both urban and rural areas? (12.3) Will it enhance accessibility to cultural heritage assets?	Cultural Heritage, Architectural and Archaeological Heritage
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	(13.1) Will it conserve and enhance the AONB? (13.2) Will it reduce the amount of derelict, degraded and underused land? (13.3) Will it protect and enhance the settlement and its setting within the landscape? / Will it protect and enhance landscape character?	Landscape Cultural Heritage, Architectural and Archaeological Heritage
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	(14.1) Will it improve business development and enhance competitiveness? (14.2) Will it improve the resilience of business and the economy? (14.3) Will it promote growth in key sectors? (14.4) Will it improve economic performance in disadvantaged areas? (14.5) Will it encourage rural diversification? (14.6) Will it encourage indigenous business? (14.7) Will it encourage inward investment? (14.8) Will it make land available for business development? (14.9) Is there a range of retail uses, including food stores and smaller affordable shops for social enterprises? (14.10) Does the proposal include managed and affordable workspace for local businesses?	Population Human Health Material Assets
15. To revitalise the Districts' town centres.	(15.1) Will it increase the range of employment opportunities, shops and services available in town? (15.2) Will it decrease the number of vacant units in town centres? (15.3) Will it enhance the viability and vitality of the Districts' centres?	Population Material Assets
16. To encourage efficient patterns of movement and the use of sustainable methods of	(16.1) Will it reduce commuting? (16.2) Will it improve accessibility to work by public transport, walking and cycling?	Population Air

SA Objective	Guide questions	Relevant SEA Topics
travel in support of economic growth	(16.3) Would it promote the use of sustainable travel modes and reduce dependence on the private car? (16.4) Will it increase the proportion of freight transported by rail or other sustainable modes?	Human Health Climatic Factors Material Assets

Use of the SA Framework

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

11.12 It is proposed to use the colour coding as shown in **Figure 11.1** below.

Figure 11.1: SA matrix guide

++	Significant positive effect likely
++/-	Mixed significant positive and minor negative effects likely
+	Minor positive effect
+/-	Mixed minor effects likely
-	Minor negative effect likely
-/+	Mixed significant negative and minor positive effects likely
--	Significant negative effect likely
0	Negligible effect likely
?	Likely effect uncertain

11.13 The dividing line between sustainability scores is often quite small. Significant effects will be distinguished from more minor effects using:

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

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

11.15 In determining the significance of the effects of the options for potential inclusion in the JLP it will be important to bear in mind the Babergh and Mid Suffolk JLP's relationship with the other documents in the planning system such as the NPPF and other national policy approaches, and regulatory requirements, as these may provide additional safeguards or mitigation of potentially significant negative effects.

Reasonable alternatives

11.16 The SA must appraise not only the preferred options for inclusion in the Local Plan but "reasonable alternatives" to these options. This implies that alternatives that are not reasonable do not need to be subject to appraisal. Part (b) of Regulation 12(2) notes that reasonable alternatives will take into account the objectives of the JLP, as well as its geographical scope. Therefore, alternatives that do not meet the objectives of national policy, or are outside the Plan area, are unlikely to be reasonable.

11.17 The objectives, policies and site allocations to be considered for inclusion within the JLP are in the process of being identified and reviewed. The Councils' reasons for selecting the alternatives to be included in the JLP will be reported at a later stage in the SA process.

Assumptions

11.18 SA inevitably relies on an element of subjective judgement. However, in order to ensure consistency in the appraisal of the site options, for each of the SA Objectives in the SA framework, a clear set of decision-making criteria and assumptions for determining significance of the effects are set out. These assumptions set out clear parameters within which certain SA scores would be given, based on factors such as the distance of site options from features such as biodiversity designations, public transport links and areas of high landscape sensitivity. The assumptions, many of which are applied through the use of Geographical Information Systems (GIS) data, are presented in **Appendix B**.

11.19 It should be noted that it may be necessary to refine the criteria and assumptions during the course of the SA work, for example to respond to consultation comments, or to ensure that they remain appropriate with respect to the evidence base and the alternative options being considered for inclusion in the JLP.

'Policy-off' site appraisals and mitigation

11.20 The appraisal of potential site allocations will, initially, be on the basis of the criteria and assumptions set out in Appendix B.

11.21 There is likely to be a large number of sites that will require appraisal (probably in the region of 200 to 300 in total), which is why a primarily GIS based approach is being used, coupled with specific evidence studies commissioned to inform the SA. This approach will help to ensure that consistency and objectivity is achieved between the site appraisals.

11.22 This initial appraisal will, in effect, be 'policy-off'. This means that each site will be appraised without reference to any potential mitigation. The purpose is to determine how

each site performs 'on its own merits' without the need for intervention through mitigation. This is in accordance with the mitigation hierarchy.

The mitigation hierarchy

The mitigation hierarchy is:

- Avoid
- Mitigate
- Compensate

This means it is preferable to avoid a significant negative effect occurring in the first instance than it is to mitigate a significant effect, and it is preferable to mitigate a significant effect than compensate for it, where mitigation is not possible.

- The potential for cumulative effects of the JSP with other planned development, such as adopted or emerging Local Plans for neighbouring districts.

SA as an iterative process

11.27 A considerable of SA work has already been undertaken on the JSP, and the work to be undertaken by LUC will build on this.

11.28 The SA will not only appraise draft policies and potential site allocations, and reasonable alternatives. It will also provide recommendations for improvements to policies, where appropriate.

11.23 Mitigation can take many forms:

- With respect to environmental effects, mitigation could involve the use of buffer zones for biodiversity sites, or guidance for development that could harm the setting of historic assets.
- In some instances, for example for large sites that are not well located to jobs, services and facilities, it may be possible to mitigate significant effects by providing jobs, services and facilities on site as part of development, such as the provision of a neighbourhood centre, a primary school, or bus services.

11.24 The policy-off appraisal will enable the SA to focus further analysis on those sites where potentially significant negative effects are identified in order to determine whether mitigation is possible, rather than describe every potential effect.

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

Cumulative effects

11.26 The identification of cumulative effects will be addressed in three ways:

- Potential cumulative effects of proposed development in a particular location (e.g. the cumulative effects of more than one site being allocated at a certain village or town).
- The cumulative effects on each of the SA Objectives of the JSP as a whole (i.e. of all the policies and site allocations in the JSP).

Chapter 12

Scope of the SA

Introduction

12.1 As described in **Chapter 1**, a considerable amount of SA work on the JLP has already been undertaken. The most recent SA work, undertaken by Place Services, was of the Regulation 18 (Preferred Options) JLP.

12.2 LUC has been commissioned to carry out the next stage of SA work, which will build on the work already undertaken. One of the purposes of appointing LUC was to validate the SA work undertaken to date, and to make amendments where necessary, as part of the next stage in the plan preparation process.

12.3 This chapter therefore describes the SA work to be undertaken.

Spatial Strategy Options

12.4 The overall spatial strategy is the backbone to the JLP. The spatial strategy should provide clear guidance on where the focus of development should be over the plan period, taking into account the role and function of settlements, existing and proposed infrastructure, and the relationship with key settlements in neighbouring districts.

12.5 To date, two rounds of alternative spatial strategy options have been subject to SA. In August 2017, a high-level SA of the following alternatives was undertaken:

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

12.6 In July 2019, three alternative spatial strategy options were subject to SA:

- New settlement option
- Focused growth in Ipswich and market towns
- A balance to growth in the strategic transport corridor areas, as well as ensuring that other market towns and rural communities benefit from appropriate growth (the preferred option in the Reg 18 JLP)

12.7 Given the nature of the overall spatial strategy options subject to SA thus far, BMSDC are of the view that further SA

work is required to ensure that both the options subject to SA, and the SA itself are robust and objective, in order to either validate or, if necessary, alter the currently preferred spatial strategy.

12.8 It has therefore been decided that the following spatial strategy options should be subject to SA at this stage:

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

12.9 It should be noted that the above spatial strategy options are not mutually exclusive. They are designed to draw out the sustainability pros and cons of focusing development in different ways across the two Districts.

12.10 The preferred spatial strategy is likely to be a combination of two or more of the spatial strategy options listed above. As a result, once the outcomes of the SA of the above spatial strategy options are known, it may be necessary to carry out further SA work that looks at combinations of the options in order to help BMSDC decide which option is the most appropriate one to include in the JLP.

12.11 In carrying out the SA work, account will need to be made not only of the existing pattern of development, but also the considerable amount of consented development that has yet to be delivered.

Potential site allocations

12.12 The previous SA included appraisal of potential site allocations. Unfortunately, some errors were identified in the appraisal of these sites and, since the SA was undertaken,

new sites have come forward for potential allocation. In addition, there will be new evidence base to inform the SA process.

12.13 As a result, it has been decided that all potential site allocations will be subject to SA, including those that have already been appraised, in accordance with the Site Assessment Criteria and Assumptions presented in **Appendix B** of this SA Scoping Report.

12.14 This will enable BMSDC to take the findings of the SA into account in deciding which sites to allocate and which to discount from inclusion in the JSP.

JLP policies

12.15 The July 2019 SA Report of the Reg 18. (Preferred Options) JLP included appraisals of all the preferred policies in the JLP and reasonable alternatives.

12.16 It is likely that BMSDC will wish to make amendments to some of the policies already subject to SA, and there could be additions or deletions to policies, to respond to the updated evidence and the current stage of SA work.

12.17 LUC will build on the findings of the SA of the Reg 18 (Preferred Options) JLP. Changes to the findings of the SA will be made where LUC considers this to be necessary, and recommendations for improvements to the JLP will be made where appropriate.

12.18 LUC will ensure that the final version of the SA Report to be subject to consultation will reflect the final version of the next draft of the JLP, showing how the SA process has influenced the preparation of the JLP.

Chapter 13

Consultation and Next Steps

13.1 In order to meet the requirements of the SEA Regulations, the views of the three statutory consultees (Environment Agency, Historic England and Natural England) are being sought in relation to the scope and level of detail to be included in the SA Report. Comments from other stakeholders and the public are also invited.

13.2 The consultees are in particular requested to consider:

- Whether there are any additional plans, policies or programmes that are relevant to the SA that should be included.
- Whether the baseline information provided is robust and comprehensive and provides a suitable baseline for the SA of the Local Plan.
- Whether there are any additional key sustainability issues relevant to the plan area that should be included.
- Whether the amended SA Framework (Chapter 11) is appropriate and includes a suitable set of SA Objectives.
- Whether the criteria and assumptions for appraising potential site allocations are appropriate for this stage of the SA process, and a suitable refinement on those used to date.
- Whether the overall spatial strategy options represent a suitable and reasonable set of alternatives, and that no other clearly distinguishable spatial strategy options should be added.

13.3 Responses from consultees will be reviewed and appropriate amendments made to the detail contained in the Scoping Report, including the baseline, policy context and SA Framework where necessary. Any updates to this detail will be presented at the next stage of the JLP preparation process.

LUC

March 2020

Appendix A

Previous consultation on the SA

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

Respondent	Representation	Response
Environment Agency	<p>We recommend that the following is added in the section of the table titled “National Plans and Programmes”:</p> <ul style="list-style-type: none"> • “Guidance on insurance and planning in Flood Risk Areas for Local Planning Authorities in England: Association of British Insurers/National Flood Forum”, 2013 • Environment Act, 1995 • “Adapting to Climate Change: A guide for local councils” – DEFRA 2010 • “UKCP18 Science Overview: Executive Summary” – Met Office, January 2019 • “The National Flood and Coastal Erosion Management Strategy for England” – DEFRA/Environment Agency, October 2017 • “Natural Flood Management – Working with Natural Processes” – DEFRA/Environment Agency, October 2017 • “Anglian river basin District: Flood Risk Management Plan 2015-21” – Parts A to C, SEA and Habitats Regs Assessment (Environment Agency 2016) • “Suffolk Local Flood Risk Management Strategy”, 2012 • “Essex and South Suffolk Shoreline Management Plan” – Environment Agency, 2010 • “East Suffolk Catchment Flood Management Plan” – Environment Agency, 2009 • Great Ouse Catchment Flood Management Plan” – Environment Agency, 2011 • North Essex Catchment Flood Management Plan – Environment Agency, 2009 • “Broadland Rivers Catchment Flood Management Plan” – Environment Agency, 2009 • “Sudbury and Great Cornard Surface Water Management Plan” – Suffolk County Council/BMT Ltd, February 2019 • “Babergh District Council Level 1 and Level 2 Strategic Flood Risk Assessment”, 2009 	<p>Place Services’ response</p> <p>These Plans and Programmes will be added to the relevant contextual review section of the SA.</p> <p>LUC’s response</p> <p>Reference to the listed documents has been made where they are considered relevant in Chapter 7.</p>

Respondent	Representation	Response
	<ul style="list-style-type: none"> Mid Suffolk District Council Level 1 Strategic Flood Risk Assessment, 2008 Babergh District Council Water Cycle Study, 2011 Suffolk County Council Preliminary Flood Risk Assessment (2011) and update (2017) "Adapting to climate change: A guide for local councils" – DEFRA, 2010 "UKCP18 Science Overview: Executive Summary" – Met Office, January 2019 "The National Flood & Coastal Erosion Risk Management Strategy for England" – DEFRA/Environment Agency, September 2011 	
	<p>3.3.7 – Biodiversity</p> <p>We would recommend that this section is enhanced as it is not fully effective in the current environmental and climate emergency. This section should make reference to the need within Babergh and Mid Suffolk for a network of high quality habitats in the wider countryside supporting populations of birds, native mammals, invertebrates and plants and that these habitats are vital in their own right and for the ecosystem services they provide for the Districts. The range of ecosystem services nature provides should be specifically outlined. Reference also should be made to ensure existing and new habitats are connected to enable wildlife to move through the Districts and is able to adapt to the changing climate. Reference needs to be made to all designated sites and the wider countryside being enhanced by any development proposals (and that any damage to existing sites is not acceptable) as part of the requirement to ensure development delivers a net gain in biodiversity.</p>	<p>Place Services' response</p> <p>The SA at the Regulation 18 stage will focus on making suitable recommendations regarding high quality habitats where relevant.</p> <p>LUC's response</p> <p>Chapter 8 (Biodiversity) in this SA Scoping Report looks at biodiversity within the BMSDC area and identifies the need within both Districts for a network of high-quality habitats. Specific reference is made to designated biodiversity assets within both Districts. Information on climate change is provided in Chapter 7.</p> <p>Biodiversity net gain will be addressed in the JLP.</p>
	<p>3.3.8 – Landscapes</p> <p>This section should be enhanced by specifically making reference to the requirement to protect, enhance, and restore both protected and non-designated landscapes.</p> <p>Landscapes in Babergh and Mid Suffolk have suffered significant damage in the last 70 years as a result of agricultural intensification and the resultant simplification of the farmed landscape. This has been through the effective loss of mixed farming systems and increases in field sizes with associated loss of hedgerows, woodland and farm ponds. Reference needs to be made to the crucial role development can play in enhancing and restoring landscapes both within and outside protected landscapes.</p>	<p>Place Services' response</p> <p>The SA at the Regulation 18 stage will focus on making suitable recommendations regarding the crucial role development can play in enhancing and restoring landscapes both within and outside protected landscapes habitats where relevant.</p> <p>LUC's response</p> <p>The protection, enhancement and restoration of both protected and non-designated landscapes will be addressed at a later stage in the SA.</p>
	<p>3.3.9 - Water Environment</p> <p>More detail should be provided in this section. Specific reference should be made to the water resource issues that apply to Babergh and Mid Suffolk in terms of current and future water availability and how vital water efficiency measures will be in any new housing and industrial development as the population grows and our climate continues to change. Water efficiency should be encouraged in existing homes and businesses.</p>	<p>Place Services' response</p> <p>Additional baseline information will be added to the relevant Annex within the SA.</p> <p>LUC's response</p> <p>Chapter 6 (Land and Water Resources) in this SA Scoping Report looks at water resource issues that apply to the JLP area.</p>

Respondent	Representation	Response
	<p>In regards to the Water Framework Directive (WFD), it should be made clear that all public bodies are responsible for delivering the objectives of WFD. The text found in the Technical Appendix of this letter may prove useful in strengthening and clarifying this section of the Sustainability Appraisal. We would suggest that the objectives for WFD on page 45 of the Sustainability Appraisal are moved up to this section as this is when WFD is first mentioned.</p> <p>As always, scoping reports should also contain more local information on WFD. An overview of WFD waterbodies and RBMP2 WFD current status would be beneficial in this section.</p> <p>This section should also reference protected sites within the water environment such as sections of the Stour and Orwell Estuaries which is a SSSI and SPA under the Habitats Directive. The scoping report should reference the habitats directive, outline the protected features of the sites and their associated objectives which are more stringent than those for WFD. In addition, the table on page 53 in the “water” section, 2nd box, the Habitats directive should be referenced against the paragraph discussing Natural England and protected areas. In the segment on page 5, in section 3.2 “Policies, Plans and Programmes (Stage B1)”, The Habitats Directive needs to be listed among the other policies and plans highlighted.</p> <p>This section also references Alton Reservoir, but this needs to be expanded upon as large sections of both of these Districts are covered by Drinking Water protected areas and Safeguard Zones. The Scoping report should highlight the existence of these protected sites and the need to safeguard these areas (particularly from diffuse runoff – pesticides) in order to protect the quality of public drinking water supply.</p>	<p>Reference is made to the European Water Framework Directive (2000) in Chapter 6 (Land and Water Resources) under the ‘Policy context’ section.</p> <p>Chapter 8 looks at both estuaries in the BMSDC area, in addition to SSSIs and SPAs. Reference is made to the European Habitats Directive (1992) in Chapter 8.</p>
	<p>Table 25: The SA Objectives</p> <p>Objective 9 “to reduce contribution to climate change” in the SA Objectives table on page 54 has this ticked as an ‘Environmental’ and ‘Social’ issue only. We would suggest that the ‘Economic’ box is also ticked. The social and economic costs of not reducing climate change impact and being prepared to adapt to it are likely to be much higher than responsible early reduction in contribution/effects. This is likewise the case for objective 10 in the same table.</p> <p>Objective 11 “To conserve and enhance biodiversity and geodiversity” has a direct impact on social effects and wellbeing. It is difficult to separate out which environmental impacts will not have social and economic impacts. For this reason, it may be beneficial to have included a statement acknowledging these are integrated and inseparable and in turn that care for a high quality environment is part of a holistic approach to ensuring a sustainable future for social and economic growth.</p>	<p>Place Services’ response</p> <p>These amendments have been made in the SA.</p> <p>LUC’s response</p> <p>This comment is not relevant to this new SA Scoping Report.</p>
	<p>3.3.10 – Climate and Energy</p> <p>We welcome the addition of the first bullet point in this section. However, as referenced in our response above, this would be better placed in section 3.3.9 (Water Environment). This also applies to the paragraphs</p>	<p>Place Services’ response</p> <p>These amendments have been made in the SA.</p> <p>LUC’s response</p>

Respondent	Representation	Response
	referring to water companies, water supply and drought plans as well the main river map.	This comment is not relevant to this new SA Scoping Report.
	<p>Table 27: SA Framework for Assessing the Plan</p> <p>We are pleased to see on page 58 in section 6 that the objective has been amended to include water quality as well as water resources. The only improvement that should be made to enhance this would be to include a proposed guide question of "will it protect and enhance protected sites under the habitats directive"?</p>	<p>Place Services' response</p> <p>This question, and the notion of water related impacts, is covered within the Biodiversity objective. The Plan's HRA / AA also informs the SA.</p> <p>LUC's response</p> <p>We will continue to use this SA Objective that looks at both water quality and water resources. The guide question has not been amended due to the fact a different SA Objective, SA Objective 11, addresses biodiversity.</p>
	<p>3.4.1: The Compatibility of the SA Objectives</p> <p>The health/open space paragraph on page 56 should be refined as recreation can take many forms and some forms may be incompatible with some biodiversity but there can be overlap. It is unlikely that any land is 'purely for landscape use' as most land is multifunctional (for example footpaths on flood storage reservoirs/local wildlife sites/ farmland). Recreation that might damage biodiversity should clearly be sited away from sensitive sites.</p> <p>Government policy on Biodiversity since Sir John Lawton's 'Making Space for Nature' (2010) report is that an integrated network of bigger, better and more joined up wildlife sites is needed for a sustainable future for Britain's biodiversity. The Sustainability Appraisal could be enhanced by referencing the aspiration for this approach to achieve a sustainable future for biodiversity in the light of habitat fragmentation and climate change. Current research suggests that the current protection of Local Wildlife Sites and Local Nature Reserves is not working effectively and that Sustainability Appraisals could go further. Essentially, habitat creation and enhancement is needed to create this network and it is important that provision is included for this.</p>	<p>Place Services' response</p> <p>These amendments have been made in the SA.</p> <p>LUC's response</p> <p>Chapter 3 in this SA Scoping Report provides a summary of the results of BMSDC's Open Space Assessment (2019).</p> <p>The protection of Local Wildlife Sites and Local Nature Reserves will be addressed at a later stage in the SA</p>
	<p>3.5.3 – The SA Framework for Assessing Site Options</p> <p>On page 66 in section 5 there is reference to conserving and enhancing water quality and resources as well as reference to source protection zones. This assessment should also look at the proximity to Surface Water Safeguard Zones as well as Source Protection Zones for groundwater. In addition, we would also advise including a site criteria for proximity to protected areas/conservation sites.</p>	<p>Place Services' response</p> <p>These issues have been explored in the SA of site options.</p> <p>LUC's response</p> <p>Chapter 6 in this SA Scoping Report makes reference to Water Safeguard Zones and Source Protection Zones. Water Safeguard Zones cover the majority of Babergh and Mid Suffolk Districts. Therefore, in order to identify particular locations where there is a significant risk to drinking water, proximity to Source Protection Zones only have been used in the site assessment criteria, as these are more locationally specific.</p>
Historic England	<p>We welcome the list of Policies, Plans and Programmes on pp5-18 of the report. We also suggest you include the following:</p> <ul style="list-style-type: none"> • The Convention for the Protection of the Architectural Heritage of Europe • Ancient Monuments & Archaeological Areas Act 1979 • Government's statement on the Historic Environment 	<p>Place Services' response</p> <p>These Plans and Programmes will be added to the relevant contextual review section of the SA.</p> <p>LUC's response</p> <p>Reference has been added to the listed documents where relevant in Chapter 9 (Historic Environment). Reference to the Suffolk Minerals & Waste Local Plan is provided in Chapter 6 (Land and Water Resources) under the 'Policy context' section, whilst reference to the AONB</p>

Respondent	Representation	Response
	<ul style="list-style-type: none"> Suffolk Minerals Plan Historic Environment Record AONB Management Plans Conservation Area Character Appraisals and Management Plans Listed building Heritage Partnership Agreements 	Management Plans is provided under the 'Policy context' section in Chapter 10 (Landscape).
	<p>The historic environment is considered the most appropriate term to use as a topic heading as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage.</p> <p>Modern convention and consistent with the NPPF is to refer to scheduled monuments rather than scheduled ancient monuments, given that a wide range and age of monuments are scheduled (eg p21)</p> <p>Similarly we suggest the use of the term Registered Park and Garden, again consistent with the NPPF. See p21 of the Scoping report).</p>	<p>Place Services' response</p> <p>These amendments have been made in the SA.</p> <p>LUC's response</p> <p>The suggested terms have been used in this SA Scoping Report (see Chapter 9).</p>
	<p>All designated heritage assets (Conservation Areas, Listed Buildings, Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields, and Protected Wrecks) within the area should be identified. Mapping these assets provides a greater indication of their distribution and highlights sensitive areas. However the maps on p 43 are of such a scale that it is difficult to interpret. We suggest that these maps should be produced at A4 for greater clarity.</p> <p>We also would expect non-designated heritage assets to be identified. These include, but are not confined to, locally listed buildings. In addition to the above, we would expect reference to currently unknown heritage assets, particularly sites of historic and archaeological interest. The unidentified heritage assets of the District should be acknowledged and outlined in this section. Identification and mapping of designated and non-designated heritage assets at risk can provide an indication of clusters and themes.</p> <p>Historic England's Good Practice Advice Note 1 contains advice on other relevant sources of evidence. These include Conservation Area Appraisals and Management Plans, Local Lists, Historic Characterisation assessments and any other in-house and local knowledge. We recommend that these other sources of evidence are considered as part of the SA process.</p>	<p>Place Services' response</p> <p>These amendments have been made in the SA.</p> <p>LUC's response</p> <p>Please see Figures 9.1-9.3 which display where the designated heritage assets are within the BMSDC area.</p> <p>Both designated and non-designated heritage assets will be looked at in a later stage of the SA and through the Heritage Impact Assessment to be undertaken by LUC.</p>
	<p>We broadly welcome the issues identified in the report. We would also suggest that other Key Sustainability Issues for the Historic Environment should include:</p> <ul style="list-style-type: none"> Conserving and enhancing designated and non-designated heritage assets and the contribution made by their settings Heritage assets at risk from neglect, decay, or development pressures; Areas where there is likely to be further significant loss or erosion of landscape/seascape/townscape character or 	<p>Place Services' response</p> <p>These amendments have been made in the SA.</p> <p>LUCs response</p> <p>One key sustainability issue is identified in relation to the historic environment and it looks into all designated heritage assets, including those at risk.</p> <p>Both designated and non-designated heritage assets will be looked at in a later stage of the SA and through the Heritage Impact Assessment to be undertaken by LUC.</p>

Respondent	Representation	Response
	<p>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</p> <ul style="list-style-type: none"> Traffic congestion, air quality, noise pollution and other problems affecting the historic environment 	
	<p>We would expect to see consideration of opportunities. It is considered that the historic environment can make a significant contribution to the success of development and there may be opportunities for the enhancement of the historic environment which comes from sustainable development proposals. It is considered that the Sustainability Appraisal should highlight these opportunities.</p>	<p>Place Services' response</p> <p>These considerations have been explored in the SA in the assessment of Policy, sites and reasonable alternatives where relevant.</p> <p>LUC's response</p> <p>Noted. Where site specific opportunities arise relating to potential development locations, these will be identified in the Heritage Impact Assessment.</p>
	<p>The historic environment should be a factor when considering a method for the generation of alternative proposals. The impact of proposals on the significance of heritage assets should be taken into consideration at an early stage. In terms of sites, this should be based on more than just measuring the proximity of a potential allocation to heritage assets. Impacts on significance are not just based on distance or visual impacts, and assessment requires a careful judgment based on site visits and the available evidence base.</p>	<p>Place Services' response</p> <p>At this current stage, the impacts on the Historic Environment highlighted within the SA are necessarily precautionary and recommendations exist within the Plan to ensure further evidence is gathered at the planning application and Plan level.</p> <p>LUC's response</p> <p>The SA will draw on the Heritage Impact Assessment to be undertaken by LUC.</p>
	<p>In preparation of the forthcoming Sustainability Appraisal, we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups.</p>	<p>Place Services' response</p> <p>Input has been included from Place Services historic environment specialists in the identification of effects and recommendations.</p> <p>LUC's response</p> <p>The SA will draw on the Heritage Impact Assessment to be undertaken by LUC, which will look at a range of information sources.</p>

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

Representation ID	Respondent	Representation	LUC's response
16235	David Howorth	<p>LP10 doesn't seem to meet the requirements. 'Plans for the needs of those wishing to build their own homes' would seem to require the council to allocate some land for the purpose. Instead, the Council is setting up a register, which does to achieve anything towards the goal, it simply serves as a record of unmet demand.</p> <p>With regard to LP23, this should be more specific about requirements for reducing new developments dependence on fossil fuels, such as having no gas or oil burners and energy must be renewable.</p>	<p>LUC was appointed in November 2019 to carry out the Sustainability Appraisal (SA) of the Babergh Mid Suffolk Joint Local Plan. All site options and policies will be re-appraised in the next stage of the SA.</p>

Representation ID	Respondent	Representation	LUC's response
		<p>There is a serious deficiency in proposed policy LP23 because it appears to be based on the policies expressed in the Green Building Council Policy Playbook. However, it is missing a vital part of that rule.</p> <p>With regard to LP25, the period of three months seems to be unreasonably short. Therefore, some renewable energy schemes may experience longer gaps and the three-month period should be extended.</p> <p>The description of Building Regulation in the glossary is incorrect.</p> <p>The SA is too optimistic in its assessments.</p>	
16239	Forestry Commission	<p>Thank you for consulting the Forestry Commission. As a Non Ministerial Government Department, we provide no opinion supporting or objecting to a policy, an application or site allocation. Rather we provide information on the potential impact that a proposed development would have on ancient woodland. Having reviewed the Sustainability Appraisal Environmental Report, June 2019, I am happy to confirm that the Environmental Report complies with the Government's 'Standing Advice' on the importance and protection of ancient woodland.</p>	Noted.
17134	AONB Team	<p>The SA does not reference either the Dedham Vale Area of Outstanding Natural Beauty (AONB) and Stour Valley Management Plan 2016 -2021 or the Suffolk Coast & Heaths Area of Outstanding Natural Beauty Management Plan 2018-2023.</p> <p>Under the landscape/townscape SA Framework objective there is no criteria to assess impacts on the Dedham Vale or the Suffolk Coast & Heaths AONBs</p> <p>It is not clear how the impacts on the nationally designated landscapes or their settings have been assessed even at a high level to support residential allocations in or with their setting.</p>	Noted.
17348	Mr Alan Walmsley	<p>This report is obviously a desk exercise, based on a formulaic approach governed by legislative guidance. As such, it is a tick box exercise which is completely pointless and merely signs off the JLP without examining it in any depth. It is very obvious that the plans have major issues within them, not the least being that some of the policies conflict with each other. Others are not policies at all, but re-statements of the obvious. Other policies display a complete lack of understanding of the major industries of the area.</p>	<p>LUC was appointed in November 2019 to carry out the Sustainability Appraisal (SA) of the Babergh Mid Suffolk Joint Local Plan. LUC has been tasked with building on and developing existing SA work for the remaining stages of the JLP preparation process.</p>
17526	Amber REI Holdings Ltd	<p>SP01</p> <p>"No alternative options are put forward at this stage, as there is no evidence to suggest that the housing requirement should be set at any level other than the local housing need figure". The current JLP minimum housing</p>	<p>SP01</p> <p>This will be addressed in the next stage of the SA. All policies and site options will be re-appraised in the next stage of the SA.</p>

Representation ID	Respondent	Representation	LUC's response
		<p>requirements does not accord with the standard method and therefore should be revised.</p> <p>SP02</p> <p>In its current form, the policy does not allow for variation in provision in line with requirements set out within neighbourhood plans, nor was this option tested as an alternative. This option should be tested through the SA and subsequently included within the JLP Policy, in order to meet objective 4 of the SA</p> <p>SP03</p> <p>Settlement hierarchy does not include provision for previously development land to come forward for development outside of settlement boundaries. This is inconsistent with the SA's statement that PDL in the first instance is a common theme throughout the plan's environmental policies. This should be reflected in the strategic policies in order for it to be effective.</p> <p>PDL</p> <p>The SA states that "The development of previously developed land in the first instance is a common theme throughout the Plan's environmental policies." the current wording of certain policies are not sufficiently flexible to allow for the redevelopment of PDL outside of designated settlement boundaries. It is therefore clear that the Plan as currently drafted fails to achieve 'PDL in the first instance' and should be amended in line with the suggestions in this Representation to achieve this.</p> <p>LP20</p> <p>LP20 makes no reference to the setting of heritage assets as correctly identified in SA Objective 12. As suggested above, the policy should be amended to reflect this and to acknowledge that there are scenarios where existing development has a significant detrimental effect on a designated heritage asset and therefore alternative development proposals which improve this will be supported.</p>	<p>SP02</p> <p>This will be addressed in the next stage of the SA. All policies and site options will be re-appraised in the next stage of the SA.</p> <p>SP03</p> <p>The SA is a legal requirement that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging Plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.</p> <p>SP03</p> <p>The role of the SA is to promote sustainable development by assessing the extent to which the emerging Plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. PDL (i.e. brownfield land) is included in the Site Assessment Assumptions and Criteria.</p> <p>PDL</p> <p>The role of the SA is to promote sustainable development by assessing the extent to which the emerging Plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. All policies and site options will be re-appraised in the next stage of the SA.</p> <p>LP20</p> <p>The role of the SA is to promote sustainable development by assessing the extent to which the emerging Plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. LUC has been tasked with building on and developing existing SA work for the remaining stages of the JLP preparation process. All policies and site options will be re-appraised in the next stage of the SA.</p> <p>As part of this process, a Heritage Impact Assessment will be undertaken by LUC to inform the SA, and the choice of sites to be allocated in the JLP.</p>
17799	Dr John Caesar	<p>In Annex E, for example site ALT20 (p197) and other sites for Needham Market, there is an issue with a statement that "Needham Market has a good relationship to the wider transport network courtesy of the train station and A14". This is inaccurate, as there is limited clearance access under the railway, the road itself is not of a standard for high traffic volumes, and it floods frequently.</p> <p>It is also disappointing that site ALT20 has still been included as an alternative site since</p>	<p>All policies and site options will be re-appraised in the next stage of the SA.</p>

Representation ID	Respondent	Representation	LUC's response
		access through the flood zone has already been deemed unsuitable.	
17859	Stradbroke Parish Council	<p>Stradbroke Parish Council responded to the SA and Local Plan with multiple objections. The Parish state that the SA and the policies ineffective, with the main ineffective policies being:</p> <ul style="list-style-type: none"> • Policy SP05 Employment Land; • Policy LP12 Safeguarding Economic Opportunities; • Policy LA099 Allocation: Land at Eye Airfield, Eye; and • Policies LA 080- LA 083 Stradbroke NP village allocations. <p>The Parish state that these policies fail to meet the requirements of, Schedule 1 and Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004 and do not assess the impacts of these Policies on different issues as required. Cranswick Poultry Production factory on Eye Airfield is not a major infrastructure development however, the Parish view the developments size as major and it meets the size requirements of Schedule 2 developments in the EIA Regulations. The Applicant requested a scoping opinion for the factory proposal, but this was not carried out. The proposal was granted planning permission despite there being no scoping opinion and an outstanding highways requirement. Reasonable alternatives were also not considered. According to the Parish, the impact of this development on other policies promoting population and human health have not been assessed.</p> <p>Furthermore, an "EIA Schedule 2" project scoping opinion was requested by the Applicant for the factory but not carried out between January and March 2017 for a development proposal later submitted as Planning application DC/17/05666. The Parish noted the Applicant requested a screening determination and MSDC determined it in favour of the Applicant on his own grounds despite an outstanding SCC Highways requirement for transport information. The Parish are also concerned about the social, environmental and economic impacts of the development, such as transport, waste and local supply chain effects. Transport modelling has not been completed and transport evidence bases have not been reference.</p> <p>The Parish state that the Local Plan is now glossing this development and the emerging policies will potentially disadvantage residence and businesses within the community, as they do not consider the offsite impacts of the factory.</p>	<p>Noted.</p> <p>The role of the SA is to promote sustainable development by assessing the extent to which the emerging Plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. LUC has been tasked with building on and developing existing SA work for the remaining stages of the JLP preparation process. All policies and site options will be re-appraised in the next stage of the SA.</p>

Representation ID	Respondent	Representation	LUC's response
		<p>The Parish suggest that the potential regional impact on land values from the rise of localised large scale poultry farming have not been assessed. Applying a brown field uplift value to greenfield agricultural land value must be modelled. This is especially important where a sub-regional housing land value is created by scale housing policy allocations such as in Stradbroke.</p> <p>Finally, the Parish state that Stradbroke NP Village Allocations is a policy in itself and the whole policy should be assessed accordingly, not just the individual sites.</p>	
17909	Mr and Mrs Kathy & Ray Barry	<p>Information made available for the consultation is not only unprofessional but misleading, almost to the point of deceiving. The Sustainability report is 1700 pages politically correct "Cods Wallop" that does not even cover within the assessment matrix material issues which should be taken into consideration.</p> <p>The Sustainability matrix does not take into account two very material and important issues when looking at potential sites. The SA report only takes into consideration potential flooding on proposed site and not any risk created to others. Access to proposed sites is the potential difference between sustainable well being for existing residents or a living hell as a result of traffic congestion and the consequent environment impact.</p> <p>The plan suggests the old SHELAA site SS020 is included within the proposal but on an alternative basis as site ALT14, I am at a loss to establish this from the published documents. Inclusion of this site is absolutely bonkers.</p> <p>The Sudbury and Great Cornard Surface Water Management Plan your consultants had access to, make it abundantly clear this site is within the CRITICAL DRAINAGE AREA. Food risk to the area would not only require full betterment but also huge engineering works to ensure no deviation of flood flow path.</p> <p>The preferred site LA042 or old SHELAA site SS0242 is now proposed to accommodate 500 new properties. No one at the LPA has taken on board what BMT are telling you!</p>	<p>LUC was appointed in November 2019 to carry out the Sustainability Appraisal (SA) of the Babergh Mid Suffolk Joint Local Plan. LUC has been tasked with building on and developing existing SA work for the remaining stages of the JLP preparation process.</p> <p>In this SA Scoping Report, LUC has suggested some amendments to the existing SA criteria.</p> <p>SA Objective 10 looks into reducing vulnerability to extreme weather events and flooding as a result of climate change, in addition to increasing resilience to these extreme weather events.</p> <p>SA Objective 16 seeks to encourage sustainable methods of travel and gives consideration to congestion.</p> <p>All site options will be re-appraised in the next stage of the SA.</p>
17999	JB Planning Associates (Mr And Mrs Britnell)	<p>SA Objectives 3.1 and 3.2</p> <p>It is highly questionable whether the proposed allocation is within 1km of a main employment area.</p> <p>The ports of Felixstowe and Harwich may be within a 1km radius of the site but access by road is considerably further by road via the B1456 to join the national highway which is heavily congested at peak times. Local employment opportunities are limited and</p>	<p>SA Objectives 3.1 and 3.2</p> <p>LUC was appointed in November 2019 to carry out the Sustainability Appraisal (SA) of the Babergh Mid Suffolk Joint Local Plan. LUC has been tasked with building on and developing existing SA work for the remaining stages of the JLP preparation process.</p> <p>All site options will be re-appraised in the next stage of the SA using the Site Assessment Criteria and Assumptions in Appendix B.</p>

Representation ID	Respondent	Representation	LUC's response
		<p>accordingly the SA should record the impacts as 'uncertain/unknown' rather than 'positive'.</p> <p>SA Objective 12.1</p> <p>Our clients do not consider the SA adequately considers the harm that would be caused to the significance of a designated heritage asset and its setting. This should be reflected in the scoring and the impacts adjusted from 'uncertain' to 'negative'.</p> <p>Our clients would also point out that due its age, their property has shallow foundations and the construction activities associated with any new development in the immediate vicinity could lead to vibration issues. There are correspondingly practical reasons why and new development should be located away from the farmhouse.</p> <p>SA Objective 13.1</p> <p>In our clients opinion the status conferred to the AONB and the contribution that the adjoining countryside makes to its character and appreciation has not been adequately considered by the SA. They therefore disagree with the assessment findings. The landscape within the area would be sensitive to change and the effect of any development would be permanent, long-term, and have a 'negative' rather than a 'positive' impact.</p> <p>SA Objectives 16.1 and 16.2</p> <p>The SA correctly records the impact of the proposed development as 'negative' (Objective 16.1) and reflects this point within the associated closing commentary for Site LA075. Our clients would however reiterate that Shotley Street is not a sustainable location for additional development other than a modest quantum that is commensurate with the size of the village and continue to have concerns in relation to the capacity of the B1456 to serve further housing given the commitments that exist at HMS Ganges.</p>	<p>SA Objective 12.1</p> <p>LUC will be undertaking a Heritage Impact Assessment for BMSDC, which will inform the site appraisals in the next stage of the SA.</p> <p>SA Objective 13.1</p> <p>As mentioned previously, all site options will be appraised in the next stage of the SA. Further evidence on landscape sensitivity is being commissioned which will take into account the potential effects on the AONBs.</p> <p>SA Objectives 16.1 and 16.2</p> <p>All site options will be re-appraised in the next stage of the SA.</p>
18002	Environment Agency	<p>Page 13 - wastewater</p> <p>In reference to the Waste Water Recycling comments on page 13 – new (2018) figures show both Stowmarket and Hadleigh are at around 91% of capacity, and development will need to be discussed with Anglian water to ensure wastewater treatment capacity will be available in a timely manner. Growth must be phased in line with water company provision of capacity and development must not be occupied until capacity is available. 'Water company upgrades/improvements' are not always needed to provide additional capacity; for example the company may be able to carry out management options, so this phrase could be changed to one more general to just say that 'ensuring growth is phased in line with</p>	<p>This SA Scoping Report contains information on wastewater in Chapter 6 (Landscape and Water Resources). Pressure on wastewater treatment facilities is identified as a key sustainability issue in this report.</p>

Representation ID	Respondent	Representation	LUC's response
		water company provision of wastewater treatment capacity'.	
18003	Environment Agency	<p>Page 13 – climate change and energy section</p> <p>This climate change and energy section references drought. The plan area is considered one of the driest regions in the UK and based on climate change predictions and Anglian Water's forecasting there is an increased likelihood of drought and increased stress on current and future water supplies. There should therefore be more emphasis on water efficiency, impacts that increased likelihood of drought will have on WFD objectives and the area's protected sites.</p>	This SA Scoping Report outlines the likelihood of drought and stress on water supply in Chapter 6 (Land and Water Resources).
18006	Environment Agency	Paragraph 5.5.2 acknowledges water efficiency and reduction in water consumption during the operational phase of building. This could be further enhanced by acknowledging the need during the construction phase too.	<p>Noted.</p> <p>The role of the SA is to promote sustainable development by assessing the extent to which the emerging Plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.</p> <p>The pressure on water resources is recognised in this SA Scoping Report</p>
18573	Pegasus Group (Endurance Estates)	These representations (in attachment) identify a number of discrepancies as to how draft Policy LA036 has been assessed. The Sustainability Appraisal should be updated in light of the matters raised in these representations.	<p>LUC was appointed in November 2019 to carry out the Sustainability Appraisal (SA) of the Babergh Mid Suffolk Joint Local Plan. LUC has been tasked with building on and developing existing SA work for the remaining stages of the JLP preparation process.</p> <p>All policies and site options will be re-appraised in the next stage of the SA.</p>
18903	Stradbroke Parish Council	SA and policies are ineffective. They fail to meet the requirements of Schedule 1 and 2 of the Environmental Assessment of Plans and Programmes Regulations 2004 nor assess the impacts of these policies as required. HRA must be reassessed as LA099 is erroneously assessed. Ways to mitigate potentially adverse effects have not been considered.	<p>LUC has been appointed to carry out the remaining Sustainability Appraisal (SA) work on the Babergh Mid Suffolk Joint Local Plan.</p> <p>All policies and site options will be re-appraised in the next stage of the SA.</p>
18961	Evolution Town Planning (Mr E. Baulby & Mr B. Baulby)	Support from the landowner for the allocation of site LA074. Rejection of claims in the Sustainability Appraisal that the development will harm the landscape and will be constrained by flood risk.	All site options will be re-appraised in the next stage of the SA and will be informed by a landscape sensitivity study and Strategic Flood Risk Assessment.
19034	Strutt & Parker (M Scott Properties Ltd)	There are elements within the Sustainability Appraisal (SA) which do not accurately reflect Site LA055 and have consequently led to an inaccurate assessment.	All site options will be re-appraised in the next stage of the SA.

Representation ID	Respondent	Representation	LUC's response
19241	Babergh Green Party	<p>We note that on p. 64, Table 28, Sustainability Assessment Framework for Assessing the Plan's Site Options shows that 'Reducing contribution to Climate Change' is now the revised Objective #9.</p> <p>In view of comments made throughout these representations, we recommend that this is restyled as Objective #1.</p> <p>We also found this document, written as it is in a very small point size, difficult to read and absorb and respectfully request that the final Sustainability Appraisal is produced in a more easily readable format.</p>	<p>The Sustainability Appraisal Framework for assessing the site options has been agreed and consulted on and will remain as it is.</p> <p>Refinements to the SA Site Assessment Criteria and Assumptions are proposed for the next stage of the SA.</p>
19280	Hopkins Homes Ltd and Hopkins and Moore (Developments) Ltd (the 'Hopkins Group')	<p>SA assessment of LA095 - While we support the Sustainability Appraisal's assessment of the site, the full representation addresses those elements which received either a '-' or '?' rating in terms of their sustainability impact. In summary, we support the conclusions within the Sustainability Appraisal regarding the site, and trust the above consideration of elements which received a '-' or '?' in terms of their Sustainability Impact in the SA can be updated in light of this additional points of clarification, and will inform the drafting of more detailed policy wording at the Regulation 19 stage, if required.</p>	<p>LUC was appointed in November 2019 to carry out the Sustainability Appraisal (SA) of the Babergh Mid Suffolk Joint Local Plan. LUC has been tasked with building on and developing existing SA work for the remaining stages of the JLP preparation process.</p> <p>All site options will be re-appraised in the next stage of the SA.</p>
19358	Strutt & Parker (Hopkins Homes Ltd and Hopkins and Moore (Developments) Ltd (the 'Hopkins Group'))	<p>The SA assessment of Site ALT13 is erroneous and does not justify rejection of the site for residential development. Indeed our detailed representations (see separate report), conclude that Site ALT13 is a more sustainable option for a residential site allocation, and one that would follow the pattern of the settlement in the Gipping Valley and result in significantly less visual impact and adverse affects on the character of the landscape, when compared to the proposed site allocation – Site LA012.</p> <p>We therefore strongly recommend the inclusion of the land east of Bramford Road, Sroughton (Site ALT13) as an allocation for residential development of up to 50 dwellings – either in addition to the existing proposed allocation Site LA012, or instead of this allocation.</p>	<p>LUC was appointed in November 2019 to carry out the Sustainability Appraisal (SA) of the Babergh Mid Suffolk Joint Local Plan. LUC has been tasked with building on and developing existing SA work for the remaining stages of the JLP preparation process.</p> <p>All site options will be re-appraised in the next stage of the SA.</p>
19619	Pegasus Group (Endurance Estates)	<p>The Sustainability Appraisal document is significantly flawed. Fundamentally, the site assessment is incomplete</p>	<p>LUC was appointed in November 2019 to carry out the Sustainability Appraisal (SA) of the Babergh Mid Suffolk Joint Local Plan. LUC has been tasked with building on and developing existing SA work for the remaining stages of the JLP preparation process.</p> <p>All site options will be re-appraised in the next stage of the SA.</p>

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

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

Appendix B

Criteria and assumptions to be applied in the SA of site options

13.4 The Site Assessment Criteria and Assumptions are designed to identify the potential for significant effects of development at a particular site, and to ensure that all sites are appraised consistently and objectively

B.1 The proposed Site Assessment Criteria and Assumptions are presented in **Table B.3**.

Assumptions regarding distances

B.2 Reference is made to distances in the Site Assessment Criteria and Assumptions. The most sustainable and easily achievable mode of transport is walking, and the distances relate to walking distances.

B.3 There are a number of pieces of research that give a variety of recommended guidance distances for walking. For example, the Institute of Highways and Transportation found that the average length of a walk journey is one kilometre. The Institute of Highways and Transportation categorises distances depending upon location and purpose of the trip, and 'desirable', 'acceptable', and 'preferred maximum':

Table B.1: Institute of Highways and Transportation Walking distances

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

B.4 For the purposes of the appraisal, distances in the appraisal will be measured as the straight line distance from the edge of the site option to existing services and facilities, and therefore actual walking distances are likely to be greater (e.g. depending on the house location within a larger site and the availability of a direct route).

B.5 Given the wide range of services and facilities normally considered in SAs, LUC has developed some guideline distances that it uses in its SA work, which are reflected in the SA Site Assessment Criteria and Assumptions for BMSDC JLP. These are as follows:

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Table B.2: Walking distance assumptions

Site assessment criterion: Proximity to...	Desirable	Acceptable	Preferred maximum
GP surgeries/ health centres	<= 400 m	401-800 m	801-1,200 m
Primary or middle schools	<= 400 m	401-800 m	801-1,200 m
Secondary schools	<= 500 m	501-1,000 m	1001-2,000 m
Further and higher education facilities	<= 500 m	501-1,000 m	1001-2,000 m
Local centres	<= 200 m	201-400 m	401-800 m
Town centres	<= 400 m	401-800 m	801-1,200 m
Railway stations	<= 500 m	501-1,000 m	1001-2,000 m
Bus stops	<= 200 m	201-400 m	401-800 m
Cycle paths	<= 200 m	201-400 m	401-800 m
Open spaces and sports centres	<= 400 m	401-800 m	801-1,200 m
Public rights of way (PRoW)	<= 200 m	201-400 m	401-800 m
Centres of employment	<= 500 m	501-1,000 m	1,001-2,000 m

Table B.3: Site Assessment Criteria and Assumptions

SA objective	Criteria	Major positive (++)	Minor positive (+)	Negligible (0)	Minor negative (-)	Major negative (--)	Unknown /uncertain (?)
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	1a GP surgeries	<=400m from nearest NHS GP surgery	401-800m from nearest NHS GP surgery	N/A	801-1,200m from nearest NHS GP surgery	>1,200m from nearest NHS GP surgery	N/A
	1b Open space, sport and recreation facilities	<=400m from open space, sport and recreation facility	401-800m from open space, sport and recreation facility	N/A	801-1,200m from open space, sport and recreation facility	>1,200m from open space, sport and recreation facility OR Loss of open space, sport and recreation facility	N/A
	1c Public Rights of Way (ProW)	<=200m from PRoW	201-400m from PRoW	N/A	401-800m from PRoW	>800m from PRoW	Development could result in loss or diversion of PRoW
	1d Noise/odour	N/A	N/A	All other sites.	For road and rail noise, sites within: A-weighted equivalent continuous sound level daytime - 16 hour (0700-2300) exceeding 59.9dB	For road and rail noise, sites within: A-weighted equivalent continuous sound level at night (2300-0700) exceeding 54.9dB. AND/OR <= 250m Site Safeguard Area of a waste management facility.	N/A

SA objective	Criteria	Major positive (++)	Minor positive (+)	Negligible (0)	Minor negative (-)	Major negative (--)	Unknown /uncertain (?)
2. To maintain and improve levels of education and skills in the population overall.	2a Primary and middle schools	<=400m from primary or middle school	401-800m from primary or middle school	N/A	801-1,201m from primary or middle school	>1,200m from primary or middle school	N/A
	2b Secondary schools	<=500m from secondary school	501-1,000m from secondary school	N/A	1,001-2,000m from secondary school	>2,000m from secondary school	N/A
	2c Further and higher education facilities	<=500m from Further and higher education facilities	501-1,000m from Further and higher education facilities	N/A	1,001-2,000m from Further and higher education facilities	>2,000m from Further and higher education facilities	N/A
3. To reduce poverty and social exclusion and ensure access to jobs and services.	3a IMD	Site located within one of the 20% most deprived areas within the JLP area	Site located within one of the 20%-50% most deprived areas within the JLP area	All other sites	N/A	N/A	N/A
	3b Town, district, local or neighbourhood centres ¹⁸⁴	<=200m from district, local or neighbourhood centre (or equivalent) AND/OR <=400m from a town centre	201-400m from district, local or neighbourhood centre (or equivalent) AND/OR 401-800m from a town centre	N/A	401-800m from district, local or neighbourhood centre (or equivalent) AND/OR 801-1,200m from a town centre	>800m from district, local or neighbourhood centre (or equivalent) AND/OR >1,200m from a town centre	N/A
	3c Centres of employment	<=500m from Strategic Employment Site/Enterprise Zone	501-1,000m from Strategic Employment Site/Enterprise Zone	N/A	1,001-2000m from Strategic Employment Site/Enterprise Zone	>2,000m from Strategic Employment Site/Enterprise Zone	N/A
4. To meet the housing requirements of the whole community.	4a Housing provision	Significantly contributes to the delivery of housing (500 dwellings or more)	Contributes to the delivery of housing (fewer than 500 dwellings)	N/A	N/A	N/A	N/A

¹⁸⁴ GIS data are not currently available for local and neighbourhood centres. Therefore, it may be necessary to use an alternative measure that equates as closely as possible to these types of centre

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SA objective	Criteria	Major positive (++)	Minor positive (+)	Negligible (0)	Minor negative (-)	Major negative (--)	Unknown /uncertain (?)
	4b Barriers to housing and services	Site located within one of the 20% most deprived areas within the JLP area ('Overall – Barriers to housing and services' domain of English Indices of Deprivation)	Site located within one of the 20-50% most deprived areas within the JLP area ('Overall – Barriers to housing and services' domain of English Indices of Deprivation).	All other sites	N/A	N/A	N/A
5. To conserve and enhance water quality and resources.	5a Source Protection Zones	N/A	N/A	All other sites.	Site falls within a Source Protection Zone 2 or 3.	Site falls within a Source Protection Zone 1.	N/A
6. To maintain and where possible improve air quality and reduce noise pollution.	6a Sudbury AQMA, Ipswich AQMAs and PM _{2.5}	N/A	N/A	All other sites.	Site likely to generate traffic on the road network with greater than PM _{2.5} micrograms/m ³ (2018 annual mean)	Site likely to generate traffic that passes through Sudbury AQMA or Ipswich AQMAs	N/A
7. To conserve soil and mineral resources.	7a Brownfield /greenfield land	N/A	Site entirely or mainly (>50%) on brownfield land	N/A	Site entirely or mainly (>=50%) on greenfield land.	N/A	N/A
	7b Agricultural land classification	N/A	N/A	All other sites.	Significant proportion (>=25%) of site on Grade 3 agricultural land. OR Site consists partly of Grades 1 and/or 2 agricultural land, but less than 25% of site.	Significant proportion (>=25%) of site on Grade 1 or 2 agricultural land.	N/A
	7c Minerals Consultation Area, existing, planned or potential mineral extraction sites	N/A	N/A	All other sites.	N/A	Site is within 250m of a Minerals Consultation Area AND/OR	N/A

SA objective	Criteria	Major positive (++)	Minor positive (+)	Negligible (0)	Minor negative (-)	Major negative (--)	Unknown /uncertain (?)
						Site is within 250m of an existing, planned or potential site allocated in the Suffolk Minerals and Waste Local Plan for sand and gravel extraction	
8. To promote the sustainable management of waste.	8a Consumption of materials and resources	The location of sites is not likely to influence the consumption of materials or resources, volumes of waste produced including the generation of hazardous waste, or the construction/demolition waste going to landfill. Nor is the location of sites likely to have an effect on the recovery, re-use or recycling of waste materials, or the demand for recycled material. These details will be promoted and secured through the detailed design proposals for each site at the planning application stage and strategic policies. Therefore, all sites are likely to have an uncertain effect on this objective.					
	8b Sustainable design and construction techniques	The location of housing and employment sites will not have an effect on sustainable design and construction techniques, as these are decided at the design stage of development. Therefore, the effects of the potential sites on this SA objective will be assumed to be negligible.					
9. To reduce contribution to climate change.	9a Transport links	Sites that perform very well against the following criteria: 1a to 1c 2a to 2c 3b to 3c 15a to 15c	Sites that perform moderately well against the following criteria: 1a to 1c 2a to 2c 3b to 3c 15a to 15c	Sites that have average performance against the following criteria: 1a to 1c 2a to 2c 3b to 3c 15a to 15c	Sites that perform moderately poorly against the following criteria: 1a to 1c 2a to 2c 3b to 3c 15a to 15c	Sites that perform very poorly against the following criteria: 1a to 1c 2a to 2c 3b to 3c 15a to 15c	Relative performance will be determined once the appraisal results are produced for the relevant criteria
	9b Energy consumption and potential for renewable energy use	The location of housing and employment sites will not have an effect on levels of domestic energy consumption and the potential for renewable energy use. These factors are influenced more by the specific design and construction methods used, and whether renewable energy infrastructure is incorporated into development. Therefore, the effects of the potential sites on this SA objective will be assumed to be negligible. If there are known site-specific factors that allow for the incorporation of viable district heating networks, or combined heat and power, these will score positively in the site assessment.					

SA objective	Criteria	Major positive (++)	Minor positive (+)	Negligible (0)	Minor negative (-)	Major negative (--)	Unknown /uncertain (?)
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	10a Flood Zones	N/A	N/A	All other sites.	>=25% of site within Flood Zone 2	>=25% of site within Flood Zone 3	Site falls within an area benefitting from flood defences
	10b Surface water flooding	N/A	N/A	All other sites.	>=25% of site within medium risk of surface water flooding	>=25% of site within high risk of surface water flooding	N/A
	10c Sustainable design and construction techniques (including SUDS)	The location of housing and employment sites will not have an effect on sustainable design and construction techniques (including SUDS), as these are decided at the design stage of development. Therefore, the effects of the potential sites on this SA objective will be assumed to be negligible.					
11. To conserve and enhance biodiversity and geodiversity.	11a Internationally and nationally designated biodiversity assets	N/A	N/A	None of the site is within SSSI Impact Risk Zone for the relevant type of development.	<=25% of the site is within SSSI Impact Risk Zone for the relevant type of development.	>=25% of the site is within SSSI Impact Risk Zone for the relevant type of development.	All effects are uncertain depending upon whether potential negative effects can be mitigated.
	11b Locally designated biodiversity assets, priority habitats and ancient woodland	N/A	N/A	N/A	Site is 250-750m from a Local Nature Reserve or County Wildlife Site AND/OR Site is 100-250m of priority habitat or ancient woodland.	Site contains or is <= 250m from a Local Nature Reserve or County Wildlife Site AND/OR Site contains or is <= 100m of priority habitat or ancient woodland.	All effects are uncertain depending upon whether potential negative effects can be mitigated.
	11c Geological sites	N/A	N/A	N/A	Site is <= 100m of a County Geological Site.	Site contains or is <= 100m of a County Geological Site.	All effects are uncertain depending upon whether potential negative effects can be mitigated.

SA objective	Criteria	Major positive (++)	Minor positive (+)	Negligible (0)	Minor negative (-)	Major negative (--)	Unknown /uncertain (?)
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	12a Nationally and locally designated and non-designated heritage assets	Beneficial effects are challenging to register and only in rare circumstances can a new development make a positive contribution to the significance of a heritage asset – for example, by removing harmful elements of its current setting, to better-reveal its character and significance. (Typically, it may only improve the visual and experiential qualities of an asset's context – however, this is a townscape and visual rather than an historic environment consideration.)		Development would not physically change any designated or non-designated heritage assets and would conserve their setting, resulting in no material change to the heritage asset's significance, or the way in which it is perceived or understood.	A minor negative effect occurs where allocation has the potential to cause minor effects to assets of high or medium significance as a consequence of setting change; and/ or, where assets of low significance may experience physical or setting change, resulting in any degree of effect (minor to significant).	A significant negative effect occurs where, as result of allocation, assets of medium or high significance are subject to a significant degree of effect, via setting or physical change.	Where archaeological potential identified, but insufficient information to make a judgement on likely levels of significance. Where effects include potential harm to previously unrecognised archaeological assets, an uncertain effect is added to scores relating to other effects to the historic environment.
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.	13a Landscape sensitivity	N/A	Site will result in derelict or degraded land being brought back into beneficial use	Site is of low landscape sensitivity	Site is of moderate or low-moderate landscape sensitivity	Site is of high or moderate-high landscape sensitivity	N/A
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	14a Employment deprivation	Employment site located within one of the 20% most deprived areas within the JLP area ('Overall – Employment Deprivation' domain of English Indices of Deprivation).	All other employment sites	N/A	N/A	N/A	N/A
	14b Employment sites	Employment site is => 5ha in size	Employment site is < 5ha in size	N/A	Loss of existing employment area.< 5ha in size	Loss of existing employment area., => 5ha in size	N/A

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SA objective	Criteria	Major positive (++)	Minor positive (+)	Negligible (0)	Minor negative (-)	Major negative (--)	Unknown /uncertain (?)
15. To revitalise the District's town centres.	15a Town and district centres	<=400m from a town centre AND/OR <=200m from district centre	401-800m from a town centre AND/OR 201-400m from district centre	N/A	801-1,200m from a town centre AND/OR 401-800m from district centre	>1,200m from a town centre AND/OR >800m from district centre	N/A
16. To encourage efficient patterns of movement and the use of sustainable methods of travel in support of economic growth.	16a Rail	<= 500m of a railway station	501-1,000m of a railway station	N/A	1,001-2,000m of a railway station	>2,000m of a railway station	N/A
	16b Bus	<= 200m of a bus stop	201-400m of a bus stop	N/A	401-800m of a bus stop	>800m of a bus stop	N/A
	16c Cycling	<= 200m of a cycle way	201-400m of a cycle way	N/A	401-800m of a cycle way	>800m of a cycle way	N/A

