

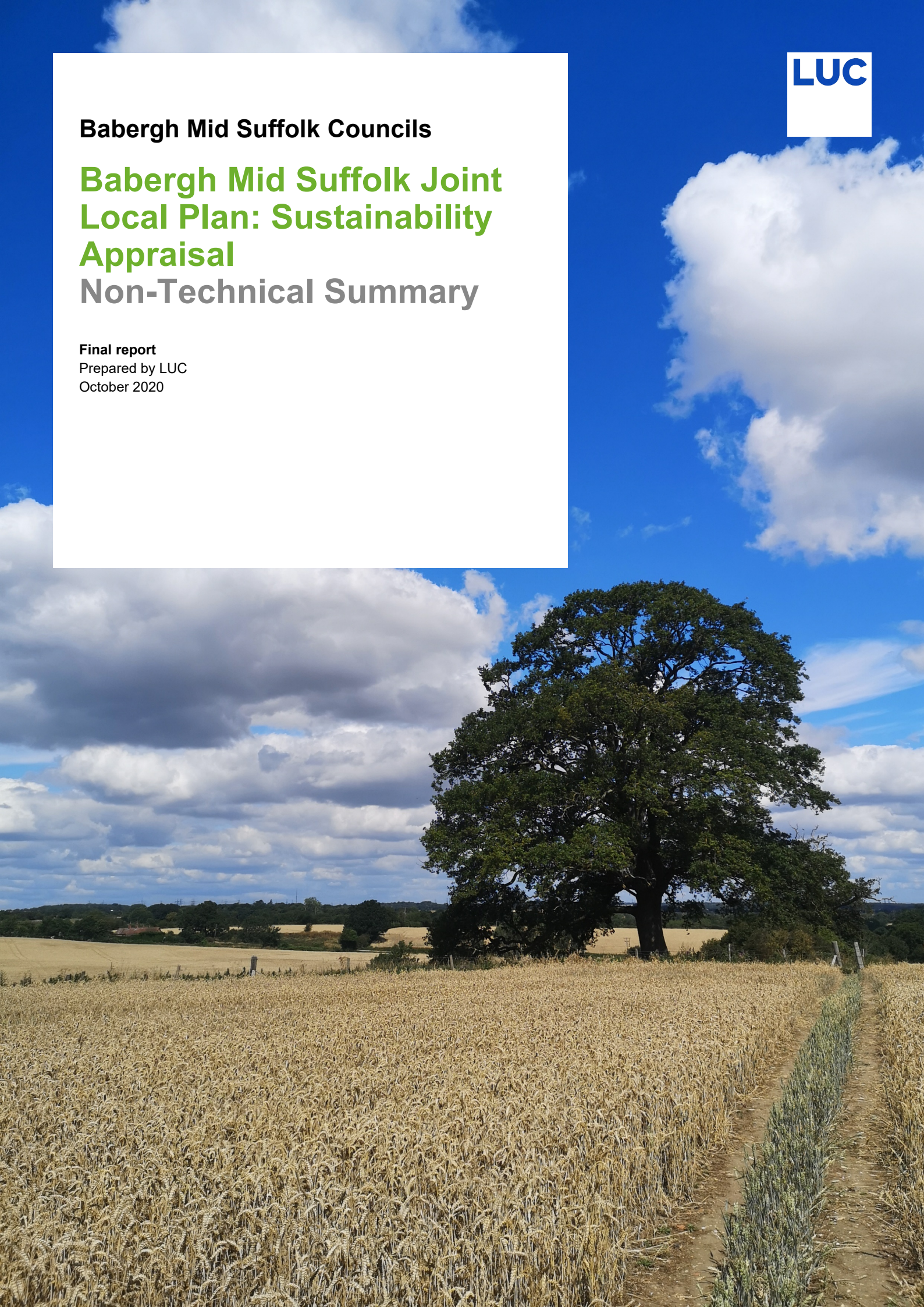
Babergh Mid Suffolk Councils

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

Final report

Prepared by LUC

October 2020



Babergh Mid Suffolk Councils

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

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Contents

Introduction	1
Methodology	1
Sustainability Context	3
Sustainability Appraisal of Spatial Strategy Options	6
Sustainability Appraisal of Reasonable Alternative Sites	9
Sustainability Appraisal Findings for the Joint Local Plan	16
Recommendations	26
Reasons for choosing the plan	26
Monitoring	26
Conclusion	26

Appendix A

Summary of SA scores for Part 3 of the JLP: Place and Allocations Policies A-1

Introduction

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

1.2 SA is an assessment process designed to consider and report upon the significant sustainability issues and effects of emerging plans and policies, including their reasonable alternatives. SA 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 location and extent of the Plan area, which incorporates both Babergh District Council and Mid Suffolk District Council (BMSDC) is shown in **Figure 1**.

Methodology

1.4 The SA process has been going on for over three years, alongside the preparation of the JLP. BMSDC are currently in the third stage of the JLP preparation process and inviting comments on the new Joint Local Plan (2020) and the SA Report. Prior to this, there were two rounds of Regulation 18 consultation on the JLP:

- Publication of a Consultation Document 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
- Publication of a Preferred Options Document in July 2019, which set out in detail the preferred strategic and non-strategic policies, including site allocations.

SA Framework

1.5 The development of a set of SA Objectives (known as an SA Framework) is a recognised way in which the likely environmental and sustainability effects of a plan and reasonable alternatives can be described, analysed and compared. The Babergh Mid Suffolk JLP SA Framework comprises the following SA Objectives:

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

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

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

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

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

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

SA Objective 7: To conserve soil and mineral resources.

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

SA Objective 9: To reduce contribution to climate change.

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

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

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

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

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

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

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

1.6 The findings of the SA are presented as colour coded symbols showing a score for each option against each of the SA Objectives along with a concise justification for the score given, where appropriate. The colour coding is shown in **Table 1**.

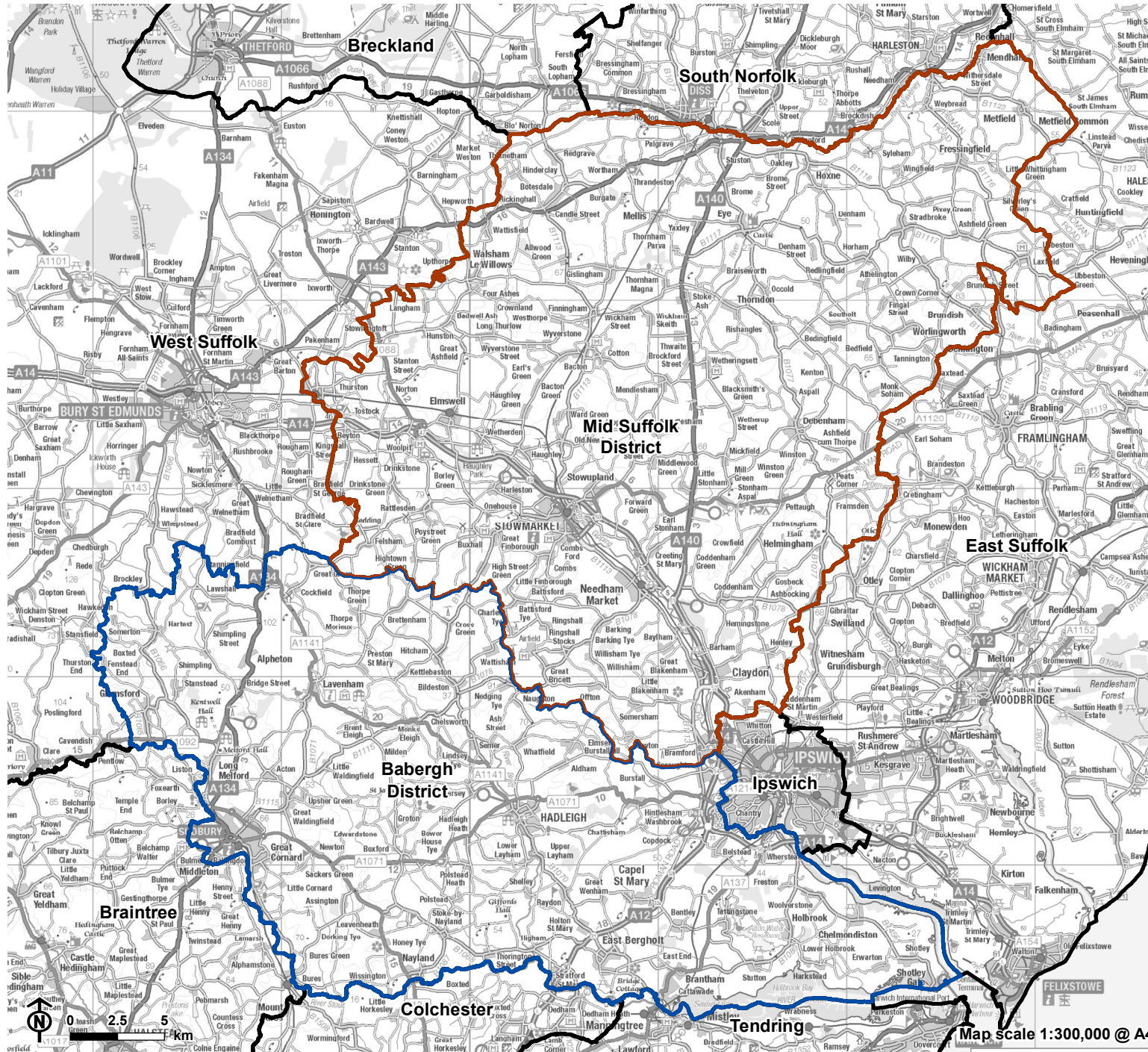


Figure 1: Location of Babergh and Mid Suffolk Plan area




-  Babergh District
-  Mid Suffolk District
-  Neighbouring local authority

Table 1: Key to SA scoring symbols

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

--	Significant/major negative effect likely
0	Negligible effect likely
?	Likely effect uncertain
N/A	Not applicable or relevant

Sustainability Context

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

A portrait of Babergh and Mid Suffolk

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

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

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

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

In common with much of Eastern England, water resources are under stress and there is a risk of harm to water quality from demands from development placed on waste water treatment plants. Both of these issues could get worse as a result of climate change. The main watercourses in Babergh and Mid Suffolk, such as the River Gipping, the River Brett and the River Stour are associated with flood risk, and parts of the two Districts experience surface water flooding. Extreme rainfall

events associated with climate change could make flood risk worse over time. The two Districts also have mineral resources of use to the construction industry, although these are not extensively worked.

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

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

Key sustainability issues

1.8 A set of key sustainability issues for Babergh and Mid Suffolk was identified during the Scoping stage of the SA and presented in the SA Scoping Report. They are as follows:

Population, health and wellbeing

- BMSDC has an ageing population, which has the potential to result in pressure on the capacity of local services and facilities, such as GP surgeries and hospitals. An ageing population also requires a mixture of housing that will meet the needs of older people, whilst also freeing up houses for younger residents. Current housing stock is predominantly old and inefficient to heat, and therefore unsuitable.
- There is an acute need for affordable housing in BMSDC because at present, the mean price of dwellings is higher than the national average and for Babergh, is also higher than the regional average. The proportion of new homes that are affordable are below targets.
- There are a number of vulnerable people, including people with learning difficulties, who have specialist housing needs (defined as sheltered, extra care, residential care or nursing care).
- There are high percentages of residents within Babergh District and Mid Suffolk District who live in rural areas, comprising 69% of Babergh's population and 75% of Mid Suffolk's population. Villages and rural areas tend to have less in the way of jobs, services and facilities than the market towns, and continue to lose services and facilities (e.g. shops and pubs).
- The number of people who have a Level 4 qualification (Degree, Higher Degree, National Vocational Qualification Level 4-5, Higher National Certificate and Higher National Diploma) and above is lower than the national average, and although the number of people

with no qualifications is equal to the national average at 25%, this could be improved.

- Although BMSDC is not generally deprived, pockets of deprivation exist across the area, with some rural areas being particularly deprived in terms of access.
- BMSDC is a relatively safe area in which to live. In recent years however certain types of crime such as burglary, criminal damage and arson, drugs, theft and weapons possession have increased.
- The provision of green space varies across BMSDC, with a deficiency in parks and recreation grounds identified and an identified need for improved open space, play and outdoor recreational facilities.

Economy

- There are a number of barriers to economic growth within BMSDC, including educational attainment and a lack of suitable premises for small and medium-sized enterprises.
- There has been a decline in shopping consumer patterns, with a number of vacant units present in key towns and service centres.
- Babergh is not identified as a known destination for business growth, partly because of its geographical location between Ipswich, Colchester and Bury St Edmunds.
- There is an uneven distribution of services throughout BMSDC and limited infrastructure in place to support economic development.

Transport, air quality and noise

- Both Babergh and Mid Suffolk benefit from some form of public transport provision. However, due to the Districts being predominantly rural, a lot of residents are dependent on the private car. This prevents both areas

from achieving a modal shift towards more sustainable modes of transport.

- Capacity issues have been identified at various junctions within BMSDC and although highway schemes to help mitigate congestion are set for implementation, capacity issues in other places will endure.
- BMSDC has one Air Quality Management Area, which covers part of Cross Street in Sudbury, and there are Air Quality Management Areas designated in neighbouring Ipswich Borough and West Suffolk (in and close to Bury St Edmunds). Additional development within BMSDC has potential to exacerbate air quality issues at these Air Quality Management Areas. Similarly, there is potential for a cumulative impact of development in neighbouring authorities alongside development in BMSDC in terms of air quality.

Land and water resources

- BMSDC contains safeguarded mineral resources which, where possible, should not be lost or compromised by future growth.
- The majority of BMSDC comprises best and most versatile agricultural land with a mix of classified agricultural land (Grades 1, 2, and 3). New development should, where possible, be delivered as to avoid the loss of higher grades of agricultural land.
- Due to Babergh and Mid Suffolk having numerous rivers running through their areas (e.g. the River Gipping and River Brett), there is a need to ensure that not only the rivers are protected but that all water sources including groundwater are too. Many areas in BMSDC are covered by Source Protection Zones to protect drinking water supplies from pollution.
- 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.
- A growing population and an increase in development will place pressure on waste water treatment works. Seven waste water treatment works have been identified as not having available capacity to meet these needs, without further investment.
- A growing population will place increased pressure on waste management facilities and there will be a requirement to meet these growing needs.

Climate change adaptation and mitigation

- While carbon emissions from all sectors have fallen in both Districts since 2005, BMSDC's emissions are still above the national and regional averages. There has also been very little progress on transport emissions. Both Councils have committed to meeting net zero carbon targets by 2030 at the latest. To meet this will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure.
- The effects of climate change in BMSDC is likely to result in extreme weather events (e.g. intense rainfall, prolonged high temperatures and drought) becoming more common and more intense.
- BMSDC will need to become more resilient to the increased risk of flooding as a result of climate change.

Biodiversity

- BMSDC contains and is in close proximity to a number of both designated and non-designated natural habitats important for their biodiversity. This includes those designated for their national and international importance. Not all Sites of Special Scientific Interest are in favourable condition.
- Although designated sites represent the most valued habitats in the plan area, the overall ecological network is also important for biodiversity as a whole and helps to support the health of designated sites, allowing species to migrate in response to climate change. The fragmentation and erosion of habitats and the wider ecological network in BMSDC is an ongoing threat to biodiversity.

Historic environment

- There are many sites, features and areas of historical and cultural interest in the plan area, a number of which are identified on the Heritage at Risk register. In the context of significant ongoing pressures for development locally, these assets, and their landscape setting, may be at risk from adverse effects from poorly located or designed development.

Landscape

- The plan area contains two Areas of Outstanding Natural Beauty 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.

1.9 Without the JLP, the National Planning Policy Framework and adopted plans in both Districts would continue to apply. However, the current trends in relation to the various social, economic and environmental issues affecting Babergh and Mid Suffolk as outlined above, would be more likely to continue without implementation of the JLP.

Sustainability Appraisal of Spatial Strategy Options

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

Spatial strategy option 1: Focusing development at the Ipswich Fringe.

Spatial strategy option 2: Focusing development at the Market Towns/Urban Areas.

Spatial strategy option 3: Focusing development at the Core Villages.

Spatial strategy option 4: Proportionate growth – all settlements increase in size in proportion to current population.

Spatial strategy option 5: Hierarchical growth – distributing development according to the settlement hierarchy.

Spatial strategy option 6: Focusing development along sustainable transport corridors.

Spatial strategy option 7: Focusing development at one or more new settlements.

Spatial strategy option 8: Focusing development at the main concentrations of employment.

Spatial strategy option 9: Focusing development in the least environmentally constrained areas.

1.11 The SA Scoping Report received a number of consultation responses. Nearly all the consultation responses that expressed an opinion supported the nine spatial strategy options.

Summary of findings

1.12 The SA scores for all the spatial strategy options for each SA Objective are shown in **Table 2**.

Table 2: Summary SA scores of spatial strategy options

SA Objective	Option 1: Ipswich Fringe	Option 2: Market Towns and Urban Areas	Option 3: Core Villages	Option 4: Proportionate Growth	Option 5: Hierarchical Growth	Option 6: Sustainable Transport Corridors	Option 7: New Settlements	Option 8: Strategic Employment Sites and Enterprise Zones	Option 9: Least Environmentally Constrained Areas
SA1: Health and Wellbeing	++/-?	++/-?	++/-	+/-	+/-	+/-	++/-?	++/-	+/-?
SA2: Education	+/-?	++/-?	+/-?	+/-?	+/-?	+/-?	++/--?	++/-?	+/-?
SA3: Access to Jobs and Services	++/-?	++	++/-	+/-	+/-	+/-	++/--?	++/-	+/-?
SA4: Housing	++/--?	++/-?	++/-?	++/-?	++/-?	++/-?	++/-?	++/-	++/--?
SA5: Water	--?	--?	--?	--?	--?	--?	--?	--?	-?
SA6: Air and Noise Pollution	--/+	++/-	++/--	--/+	--/+	++/--	+/-?	++/-	--
SA7: Soils and Minerals	--?	--?	--?	--?	--?	--?	--?	--?	--?
SA8: Waste	0	0	0	0	0	0	0	0	0
SA9: Climate Change Mitigation	++/-	++/-	+/-	--/+	--/+	++/--	++/-?	++/-	--
SA10: Climate Change Resilience	-?	-?	-?	-?	-?	-?	-?	-?	-?
SA11: Biodiversity and Geodiversity	--?	--?	--?	--?	--?	--?	+/-?	--?	-?
SA12: Historic Environment	-?	-?	--?	--?	--?	--?	-?	--?	-?
SA13: Landscapes and Townscapes	--/+?	--/+?	--?	--?	--?	--/+?	--?	--?	-?
SA14: Economic Growth	--/+?	++/-	+/-	+/-?	+/-?	+/-?	+/-?	++/-	--/+?
SA15: Revitalising Town Centres	--/+?	++	+/-	+/-	+/-	++/-	--/+?	++/-?	--/+
SA16: Sustainable Transport	++/-	++	+/-	+/-?	+/-?	++/--	++/-?	++/-?	--/+

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

increases in air pollution and carbon emissions. Three out of the five Market Towns have railway stations, as does Ipswich.

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

Option 2 (Market Towns & Urban Areas), and Option 6 (Sustainable Transport Corridors).

1.15 Overall, Option 1 (Ipswich Fringe), Option 3 (Core Villages) and Option 6 (Sustainable Transport Corridors) perform similarly. Option 1 performs moderately well because development in the Ipswich urban fringe would be reasonably close to the major centre of employment, services and facilities in the area. Ipswich is already the focus of a significant amount of in-commuting from Babergh and Mid Suffolk, and therefore concentrating development here would reduce journey lengths and potentially offer greater opportunity to use sustainable transport modes, such as buses, cycling and potentially walking. However, focusing development here could still result in car travel from the Ipswich Fringe, and impacting upon the Air Quality Management Areas in the town, and the distances from the outer reaches of the Ipswich Fringe, coupled with the barriers of the dual carriageways around Ipswich, may militate against walking and cycling. This option would not meet the needs of other parts of Babergh and Mid Suffolk, including the Market Towns and more rural locations. It is also well within the zone by which recreation impacts on the Stour and Orwell Estuaries Special Protection Area and Ramsar site would need to be mitigated.

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

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

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

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

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

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

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

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

Conclusions

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

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

1.25 There will be local needs outside the Market Towns and Urban Areas that need to be provided for, and support for the

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

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

Sustainability Appraisal of Reasonable Alternative Sites

1.27 In total, 259 reasonable residential sites have been subject to SA across the JLP area as a whole, and 53 reasonable alternative employment sites. The methodology for the appraisal of these reasonable sites is described in Chapter 2 (Methodology) of the main SA Report.

1.28 Each site was assessed against a set of criteria, under each of the sixteen SA Objectives. The appraisal was undertaken on a 'policy-off' basis, which means that potential site-specific mitigation was not taken into account. In doing so, each site has been assessed in exactly the same way, based on the baseline characteristics of each site and its environs.

Key findings for residential sites

1.29 The residential sites that were subject to SA are shown in **Figures 2 and 3**, indicating which sites are already committed (i.e. have planning consent) and therefore automatically allocated, which sites are allocated that are not yet committed (i.e. do not yet have planning consent), and which sites were discounted by BMSDC for inclusion as allocations in the JLP.

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

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

sites, which tend to be in the Hinterland Villages and Hamlets and Countryside.

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

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

1.33 Similarly, when looking across all sites, there is not a lot of difference between sites that have already been committed and those that are allocated that have yet to receive planning consent. It is not possible to say that, collectively, one category of site (i.e. committed and allocated, allocated but

not committed, or reasonable alternative) clearly performs better than the others, across all of the JLP settlement hierarchy categories.

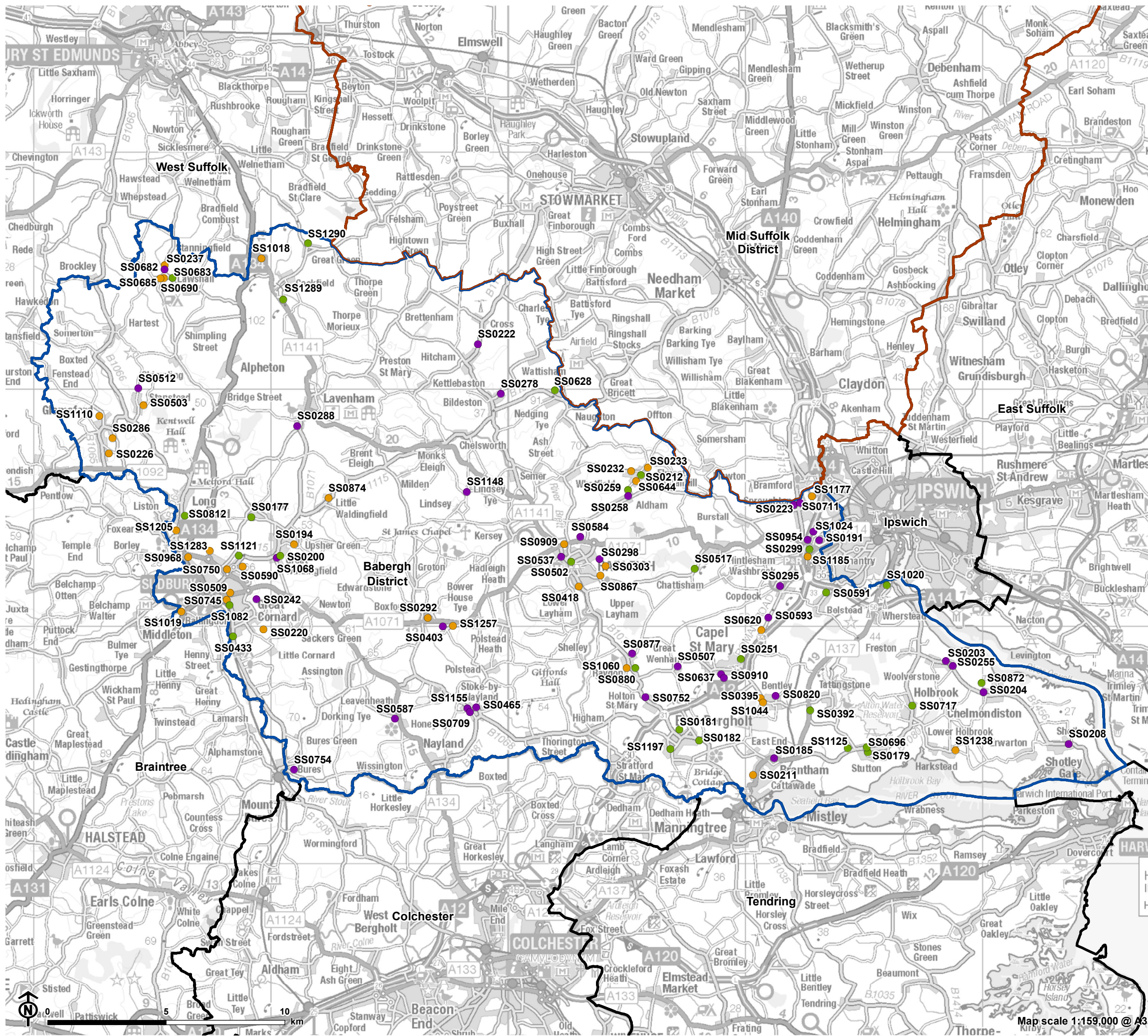
1.34 Therefore, in terms of overall performance, the most important factor appears to be which of the JLP settlement hierarchy categories a site falls into when measured against the SA Objectives. There are differences between sites at the settlement level, but these need to be considered on a site-by-site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

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

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



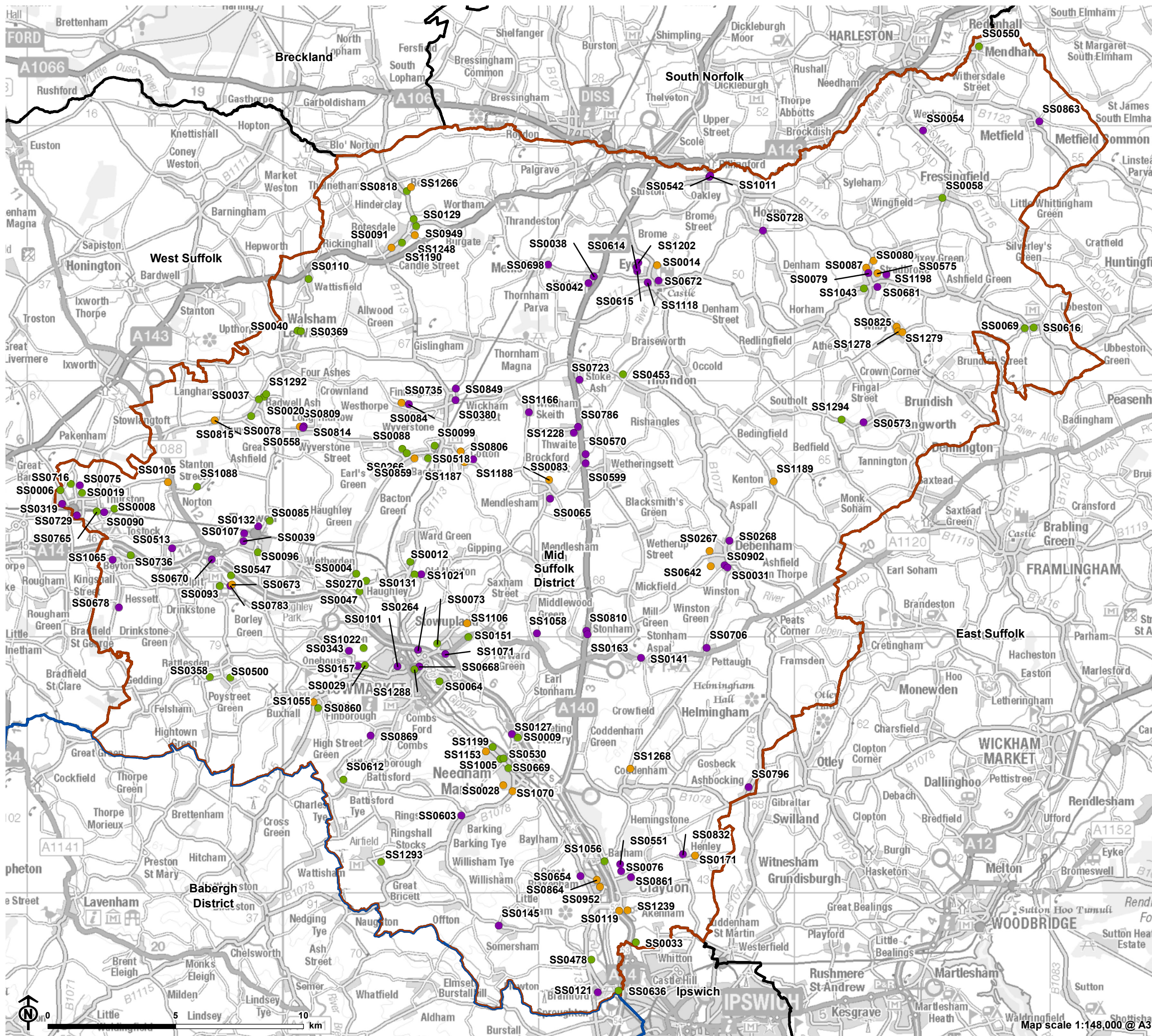
Figure 2: Residential sites subject to SA in Babergh District



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



Figure 3: Residential sites subject to SA in Mid Suffolk District



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

Key findings for employment sites

1.38 The employment sites that were subject to SA are shown in **Figures 4 and 5**, indicating which sites are already committed (i.e. have planning consent) and therefore automatically allocated, which sites are allocated that are not yet committed (i.e. do not yet have planning consent), and which sites were discounted by BMSDC for inclusion as allocations in the JLP.

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

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

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

1.41 There were many fewer sites considered for employment uses, when compared to residential uses and, unlike the residential sites, by far the majority have not been allocated in the JLP. Of the 53 sites subject to SA, only seven sites are allocated and, of these, two already have planning consent.

1.42 Given that only often small numbers of sites in each of the JLP settlement hierarchy categories in each District were subject to SA, any generalised conclusions need to be treated with a considerable degree of caution. Bearing this in mind, our analysis suggests that, when looking across all the SA Objectives, if each SA Objective is given equal weight:

- Sites in the Market Towns and Urban Areas tend to perform slightly better than sites elsewhere, although not significantly so, but notably better than sites in the Hinterland Villages and Hamlets and Countryside.
- Sites in the Market Towns and Urban Areas and (although to a lesser extent) Ipswich Fringe in Mid Suffolk are the best performing overall.
- Site size does not appear to make a difference in terms of performance.
- Most of the allocated sites perform relatively well, although there are some reasonable alternatives that

perform as well, and some better both overall at both an individual and parish level.

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

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

New settlement alternatives

1.45 The SA of Spatial Strategy Options found that a new settlement option could potentially perform relatively well in sustainability terms if a location could be found that does not have environmental constraints, but that it is difficult to achieve self-containment within a new settlement, particularly smaller scale new settlements that do not provide a full range of services, facilities and jobs. On the other hand, a new settlement could 'design-in' walking and cycling etc. from the start.

1.46 Eight locations for new settlements were submitted to BMSDC through the JLP process, either through the formal 'call for sites', the 2019 Regulation 18 JLP consultation or the Babergh and Mid Suffolk Sustainability Appraisal consultation (March 2020).

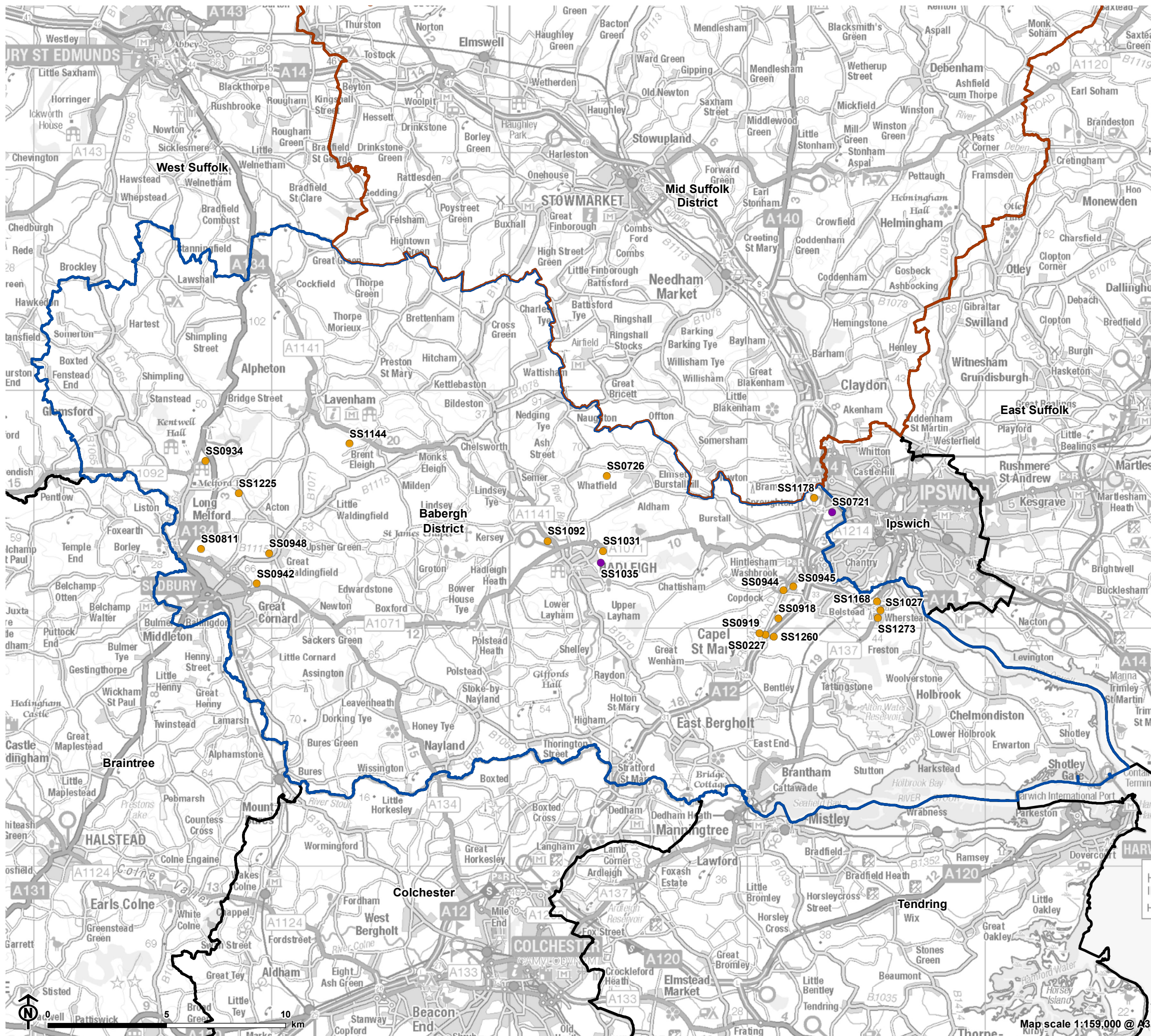
1.47 Having considered the concept of a new settlement, and the specific proposals put forward by land promoters, BMSDC concluded that none of the new settlement submissions should be considered as reasonable alternatives for this JLP. This is because:

- None of the new settlement proposals clearly meet the criteria set out in the July 2019 JLP for a new settlement.
- There is a sufficient supply of proportionate sites in and around existing settlements to meet the Councils' Objectively Assessed Need.
- The long lead-in and delivery times required to deliver a new settlement.

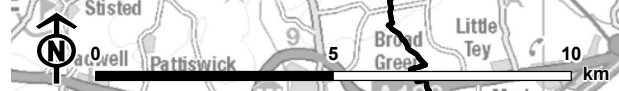
1.48 As a result, the new settlement proposals put forward by land promoters have not been subject to SA.



Figure 4: Employment sites subject to SA in Babergh District



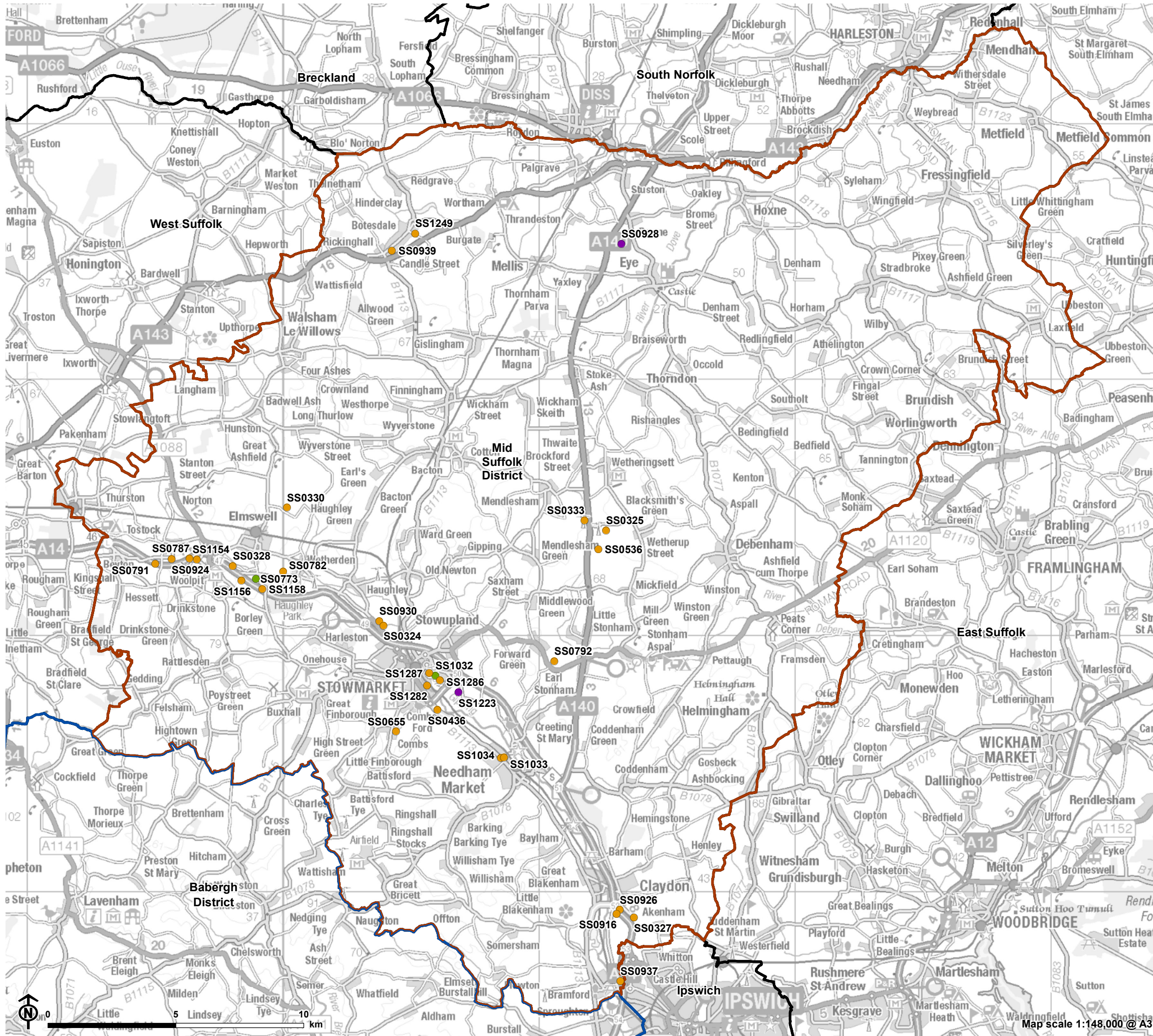
- Babergh District
 - Mid Suffolk District
 - Neighbouring local authority
- Site**
- Committed and allocated
 - Allocated not committed
 - Not committed or allocated



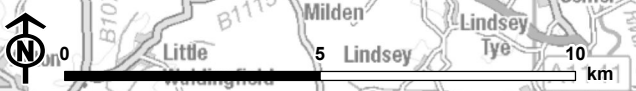
Map scale 1:159,000 @ A3



Figure 5: Employment sites subject to SA in Mid Suffolk District



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



Map scale 1:148,000 @ A3

Sustainability Appraisal Findings for the Joint Local Plan

1.49 The Joint Local Plan is divided into three parts:

- Part 1: Vision, Objectives and Strategic Policies
- Part 2: Local Policies
- Part 3: Place and Allocation Policies

1.50 Table 3 below contains a summary of the effects of Part 1 of the JLP (Strategic Policies), whilst **Table 4** contains a summary of the effects of Part 2 of the JLP (Local Policies).

Appendix A (Summary of SA scores) contains a summary the effects of Part 3 of the JLP (Place and Allocation Policies) (**Table A.1**).

Table 3: Summary of SA scores for Part 1 (Strategic Policies)

Policy	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
Policy SP01 – Housing Needs (Babergh District)	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0
Policy SP01 – Housing Needs (Mid Suffolk District)	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0
Policy SP02 – Affordable housing (Babergh District)	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0
Policy SP02 – Affordable housing (Mid Suffolk District)	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0
Policy SP03 – Settlement Hierarchy	+	+	++/-	++/-	?	-/-	?	0	+	?	+	+	+	+	++	+
Policy SP04 – Housing Spatial Distribution (Babergh District)	++/-	++/-	++/-	++	-	-/+	-/+	N/A	++/-	-	--?	-?	-	++/-	++/-	++/-
Policy SP04 – Housing Spatial Distribution (Mid Suffolk District)	++/-	++/-	++/-	++	-	-/+	-/+	N/A	++/-	-	--?	-?	-	++/-	++/-	++/-
Policy SP05 – Employment Land	+	++	++/-	0	0	++/-	++	0	++/-	0	+	+	+	++	+	++/-
Policy SP06 – Retail Land Town Centre Use	+/-	0	+	0	0	+/-	+++?	0	+	0	0	+	+	++	++	+
Policy SP07 – Tourism	0	0	0	0	0	0	0	0	+	+	0	+	+	++	++	0
Policy SP08 – Strategic Infrastructure Provision	++	++	0	0	+	+/-?	0	+++?	+/-?	?	++	0	+	+	+	+/-?
Policy SP09 – Enhancement and Management of the Environment	0	0	0	0	+?	+?	+?	0	+	+?	++	++	++	0	0	0
Policy SP10 – Climate Change	+	+	+?	0	+	+	+	+	++	++	+	0	+	0	0	0

Table 4: Summary of SA scores for Part 2 (Local Policies)

Policy	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
Policy LP01 – Windfall development in hamlets and dwellings clusters	+	0	-	+/-	0	0	+	0	+/-	0	+	+	+	0	0	-
Policy LP02 – Residential Annexes	+	0	0	+	0	0	0	0	+	0	+	+	+	0	0	0
Policy LP03 – Residential Extensions and Conversions	+	0	0	+	0	0	0	0	0	0	+	+	+	0	0	0
Policy LP04 – Replacement Dwellings in the Countryside (Outside of Settlement Boundaries)	+	0	0	+	0	0	?	0	0	0	+	+	+	0	0	0
Policy LP05 – Replacement Dwellings and Additional Dwellings on Sub-Divided Plots Within Settlement Boundaries	+	0	+	+	0	0	0	0	0	0	+	+	+	0	0	0
Policy LP06 – Mix and type of composition	+	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0
Policy LP07 – Supported and Special Needs Housing	++	0	+	++	0	0	0	0	0	0	+	+	+	0	+	+
Policy LP08 – Affordable Housing	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0
Policy LP09 – Provision for Gypsy and Traveller and Travelling Showpeople	+	+	+	++	+	+	+	0	0	0	0	0	0	0	0	0
Policy LP10 – Moorings, Marinas and Houseboats	0	0	0	+	+	0	0	0	0	0	+	0	+	0	0	0
Policy LP11 – Self-Build and Custom-Build	+	0	0	+	0	0	0	0	+	0	+	+	+	0	0	0
Policy LP12 – Employment Development	+	+	0	0	0	+/-	?	0	+/-	0	+	+	+	++	0	+/-
Policy LP13 – Safeguarding Economic Opportunities	+	0	++	0	0	0	0	0	0	0	0	0	0	++	0	0
Policy LP14 – Town Centre and Retail	+	0	+	+	0	0	0	0	0	0	0	0	+	++/-	++	0

Non-Technical Summary

Babergh Mid Suffolk Joint Local Plan: Sustainability Appraisal
October 2020

Policy	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
Policy LP15 – Tourism	0	0	++	0	0	+/-	+	0	+/-	0	+/-	+/-	+/-	++	+	+/-
Policy LP16 – Countryside Tourist Accommodation	0	0	0	+/-	0	0	0	0	+	0	+	+	+	+/-	0	0
Policy LP17 – Environmental Protection	++	0	0	+/-	++	++	++	++	0	0	+/-	0	0	+/-	0	0
Policy LP18 – Biodiversity and Geodiversity	+	0	0	+/-	0	0	0	0	0	0	++	0	++	+/-	0	+
Policy LP19 – Landscape	0	0	0	+/-	0	0	0	0	0	0	+	+	++	+/-	0	0
Policy LP20 – Area of Outstanding Natural Beauty	0	0	-	+/-	0	+	0	0	0	0	+	+	++	+/-	0	0
Policy LP21 – The Historic Environment	0	0	0	+/-	0	0	0	0	0	0	0	++	+	+/-	0	0
Policy LP22 – Change in Land Use for Equestrian or Other Animal/Rural Land Base Uses	+	0	+	+	0	0	+	+	0	0	+	+	+	+/-	0	0
Policy LP23 – Agricultural Land to Residential Garden Land	0	0	+	0	0	0	+	0	0	0	+	0	+	0	0	0
Policy LP24 – New Agricultural/Rural Buildings in the Countryside	+	0	0	0	0	0	0	0	0	0	+	+	+	+/-	0	+/-
Policy LP25 – Sustainable Construction and Design	+	+	+	+/-	++	++	+	+	++	++	+	0	+	0	0	+
Policy LP26 – Design and Residential Amenity	++	0	+	+	0	+	0	+	0	+	++	+	+	0	0	++
Policy LP27 – Energy Sources, Storage and Distribution	+	+	0	0	+	+	0	0	++	0	+	+	+	++	0	0
Policy LP28 – Water Resources and Infrastructure	0	0	0	0	++	0	0	0	0	++	+	0	0	0	0	0
Policy LP29 – Flood Risk and Vulnerability	+	0	0	+	++	0	+	0	0	++	+	+	+	+	0	0

Non-Technical Summary

Babergh Mid Suffolk Joint Local Plan: Sustainability Appraisal
October 2020

Policy	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
Policy LP30 – Designated Open Spaces	++	0	+	0	+?	+?	+?	0	+?	+?	+?	+?	+?	0	0	+?
Policy LP31 – Services and Facilities Within the Community	++	++	++	+	0	+	0	0	+	0	0	+	+	+	+	+
Policy LP32 – Safe, Sustainable and Active Transport	++	0	+	0	0	++/-	0	0	++/-	0	+	0	0	0	+	++
Policy LP33 – Managing Infrastructure Provision	++	++	++	+	++	0	0	++	+	++	0	0	0	+	+	+/-
Policy LP34 – Health and Education Provision	++	++	+	-	0	0	0	0	+	0	0	0	+	0	0	+
Policy LP35 – Developer Contributions and Planning Obligations	+?	+?	+?	++	+?	+?	0	+?	+?	+?	+?	0	0	+?	0	+?

Overall effects of implementing the JLP

1.51 The overall effects of implementing the JLP, taking into account all the policies and site allocations, are summarised by SA Objective below.

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

1.52 The majority of policies in Part 1 and Part 2 of the JLP will have either significant positive or minor positive effects on SA Objective 1. In terms of direct effects, the JLP aims to deliver the health services and facilities needed to support a growing population and new development. The housing policies seek to supply the numbers and types of housing required to meet housing need, placing great emphasis on the quality of housing, and specific needs, such as for an ageing population, which should all have a positive effect on health.

1.53 Policies that address environmental protection and open space provision should help to provide conditions that encourage mental and physical wellbeing. Policies that promote sustainable transport modes, such as walking and cycling, should encourage active lifestyles, and therefore improve health.

1.54 With respect to the site allocations in Part 3 of the JLP, the vast majority are anticipated to have a positive effect on SA Objective 1, and in many instances a significant positive effect, because of their access to GP surgeries, or to open space, sport and recreation facilities, or to Public Rights of Way, or a combination of these. In some instances, site allocation policies require contributions towards healthcare provision.

1.55 It should be noted that during the construction phase there may be some temporary negative effects to local residents from noise and disturbance, but these will cease once the developments are completed.

1.56 Overall, it is considered that the JLP will have a **significant positive effect (++)** on SA Objective 1 (Health and Wellbeing).

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

1.57 Only a small number of the JLP Part 1 and Part 2 policies are considered likely to have an effect on SA Objective 2. However, where such effects are identified, they are likely to be positive. The most significant effects are associated with policies that seek to provide the community infrastructure and education facilities required to support new development.

1.58 The spatial strategy in the JLP focuses most development on those settlements that are likely to have the greatest range of services and facilities, including education

provision. However, with respect to the actual site allocations in Part 3 of the JLP, the picture becomes more mixed. Some sites are well located to schools, particularly primary schools, but quite a large proportion of sites are not within desirable or acceptable walking distance. In some instances, the site allocation policies require financial contributions to education provision (which normally means investment in existing schools), and in a small number of allocations, new schools will be built. But, generally, the situation regarding accessibility will not alter a great deal.

1.59 Overall, it is considered that the JLP will have **mixed minor positive and minor negative effects (+/-)** on SA Objective 2 (Education and Skills).

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

1.60 Around half the policies in Part 1 and Part 2 of the JLP are likely to have a positive effect on SA Objective 3. Only two policies are considered likely to have negative effects, in both cases minor. This is because the spatial strategy in the JLP is to focus development at those settlements that are more likely to have jobs and services, although the Market Towns and Urban Areas tend to have a greater range than the Core Villages and settlements in the Ipswich Fringe. However, settlements in the Ipswich Fringe are relatively well located to Ipswich itself, and the Core Villages in some instances can be quite close to Market Towns.

1.61 There are a number of policies that seek provide for community services and facilities to support development, and a number of policies could have indirect positive effects on the achievement of this SA Objective.

1.62 With respect to the site allocations in Part 3 of the JLP, a significant proportion are anticipated to result in a positive effect against SA Objective 3, and in some cases this effect could be significant positive. There is nonetheless a sizeable minority of site allocations that score negatively against this SA Objective, although in most cases this is recorded as a minor negative effect. There are, though, policies within the JLP that require contributions to community infrastructure.

1.63 Overall, it is considered that the JLP will have a **mixed significant positive and minor negative effect (++)** on SA Objective 3 (Accessibility).

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

1.64 One of the key focal points of the JLP is to provide for the homes identified as being needed in Babergh and Mid Suffolk over the Plan period. A number of policies address this issue directly, both in terms of the number of homes, but also they type of home, including affordable housing, and homes for

particular needs, such as the elderly, and gypsies and travellers. Considerable attention is also placed on the quality of housing provision in terms of design and specifications. Although the focus of housing provision is towards the upper end of the settlement hierarchy, there is provision for new homes in smaller settlements too, as well as windfalls, which means that all communities across the Plan area should be able to accommodate new homes if needed, commensurate with the size and role of the settlement concerned.

1.65 As a result, a number of policies and site allocations in Parts 1, 2 and 3 of the JLP receive positive effects, and in many instances these effects are considered to be significant. On occasion, it is noted that policies that seek to protect the environment, and similar policies, could restrict opportunities to develop housing, but enough site allocations have been identified to deliver the housing needed. Indeed, over 60% off the housing supply requirement in the JLP already has planning consent.

1.66 Therefore, it is considered that the JLP will have a **significant positive effect (++)** on SA Objective 4 (Housing).

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

1.67 Water resources and water quality are important issues for new development in Babergh and Mid Suffolk, given that this is one of the driest parts of the UK, and that pressure on the water environment is likely to increase as a result of climate change.

1.68 This is recognised in a number of policies in the JLP that seek to ensure that the water infrastructure is in place to support new development. This applies both to water supply and to waste water treatment, taking into account also the potential effects on internationally designated biodiversity sites. The relevant policies are recorded as likely to have positive effects on SA Objective 5, and in a number of instances these effects are considered to be significant.

1.69 On other hand, the SA, with reference to the Water Cycle Study where relevant, identified a number of site allocations where there is a risk to the water environment, with respect to Source Protection Zones, Water Resource Zones, waste water treatment capacity, and foul sewerage network capacity.

1.70 As a result of the research that has been put into this issue through the Water Cycle Study and engagement between BMSDC and the water companies and the Environment Agency, the JLP does include the appropriate safeguards. Some of the site allocations include mitigation for some of the matters, but generally reliance is placed on policies in Part 1 and Part 2 of the JLP to cover all areas.

1.71 It is clear that, as a result of development planned in the JLP, there will be pressure on water resources and waste

water treatment works and supporting infrastructure. Notwithstanding policy safeguards in the JLP, and given the sensitivity of the water environment, it is considered that, in line with the precautionary principle, a residual risk remains. Therefore, a **minor negative effect (-)** is recorded against SA Objective 5 (Water).

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

1.72 Without the benefit of traffic modelling, it was not possible to quantify the effects on air quality, and therefore a precautionary approach was taken in the SA.

1.73 Air pollution is not a major issue in Babergh and Mid Suffolk although an Air Quality Management Area has been declared in Sudbury, and the strategic road network is associated with higher levels of air pollution. However, both neighbouring Bury St Edmunds and Ipswich contain a number of Air Quality Management Areas and, given the degree of commuting by car to these two towns by residents of Babergh and Mid Suffolk, it was considered an important factor to take into account in the SA. It is not unusual for people living 25km from Ipswich and Bury St Edmunds to commute, and therefore all site allocations within this distance were considered likely to have a negative effect on the Air Quality Management Areas, as well as on Sudbury too. Sites within half the distance were considered to have the potential for a significant negative effect. Although, some site allocations are small in terms of the number of dwellings it is the cumulative effect of such journeys that add up to a significant effect. Thus, ten sites of ten dwellings could have a similar effect as one site of 100 dwellings.

1.74 As a result, a large number of site allocations were identified as having the potential for a significant negative effect on air quality, and several more a minor negative effect.

1.75 Within Part 1 and Part 2 of the JLP, there is a recognition that air quality is an issue that needs to be taken into account, and a number of policies receive positive effects, some of which are significant. However, the focus is on ensuring that development within an Air Quality Management Area does not have unacceptable air quality impacts, rather than on the traffic generated from elsewhere in the Plan area contributing to pollution in Air Quality Management Areas and along the main transport corridors.

1.76 The JLP does include policies that seek to promote sustainable forms of transport, as well as electric charging points for electric cars, which are less polluting than combustion engines and likely to become more commonplace during the Plan period.

1.77 Similarly, the main corridors of noise pollution tend to follow the strategic transport corridors, which also form the

focus for a considerable amount of development in the site allocations. Some of the site allocation policies include the need to mitigate against the potential effects of noise pollution.

1.78 Overall, given the number of Air Quality Management Areas within and in close proximity to Babergh and Mid Suffolk, the importance of such locations for commuting journeys and the reliance on the car for commuting, it is considered that the JLP will have a **mixed significant negative and minor positive effect (+/-)** on SA Objective 6 (Air and Noise).

SA Objective 7: To conserve soil and mineral resources

1.79 Compared to many local authorities, there are very few brownfield sites available for development in Babergh and Mid Suffolk. However, the site allocations in Part 3 of the JLP do include a small number of sites on previously developed land, and therefore for these sites significant positive effects have been identified.

1.80 However, the vast majority of site allocations are on greenfield land, and in number of instances these are likely to include potentially best and most versatile agricultural land, despite policy safeguards in Part 2 of the JLP that seek to avoid development of such agricultural land. For development proposals that do not have site allocations, there is a clear policy requirement that best and most versatile agricultural land should be avoided if possible. In some instances, there is a risk that mineral resources could be sterilised, although this is not as big an issue as the potential loss of high grade agricultural land.

1.81 Overall, it is considered that the JLP will have a **mixed significant negative and minor positive effect (+/-)** on SA Objective 6 (Soils and Minerals).

SA Objective 8: To promote the sustainable management of waste

1.82 The promotion of sustainable management of waste was not considered to be of material relevance to site appraisal and allocations.

1.83 There are several references to the need for suitable waste management practices in policies in Parts 1 and 2 of the JLP, and some of the site allocation policies include a requirement for contributions towards household recycling provision.

1.84 Overall, it is considered that the JLP will have a **minor positive effect (+)** on SA Objective 8 (Waste).

SA Objective 9: To reduce contribution to climate change

1.85 Climate change is referenced throughout the JLP and there are several policies in Parts 1 and 2 of the JLP that are

considered likely to have a significant positive effect with respect to SA Objective 9, including a strategic policy that is dedicated solely to climate change related matters. The JLP stresses the importance of a low carbon approach to construction and design of development, and it explicitly supports renewable, decentralised and community energy generating proposals, subject to certain criteria being met.

1.86 The spatial strategy focuses development on those settlements that have the most jobs, services and facilities, as well as public transport, although some of these settlements are better served than others (e.g. Market Towns compared to Core Villages, in general terms). A significant proportion of development will take place in the strategic transport corridors, which may give easier access to rail and bus services, but on the other hand could facilitate car travel.

1.87 When it comes to the site allocations, the picture is mixed. Given that quite a few of the site allocations are on the edge of settlements, they are not always that well located in terms of walking distance to town centres, services and facilities, and public transport services may not be that frequent. Nonetheless, considerably more site allocations score positively than negatively against SA Objective 9.

1.88 Overall, it is considered that the JLP will have **mixed significant positive and minor negative effects (++/-)** for SA Objective 9 (Climate Change Mitigation).

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

1.89 Not that many of the Part 1 and Part 2 JLP Policies are considered likely to have an effect on SA Objective 10. Most of the ones that do are important, though, as they are likely to result in significant positive effects. The focus of such policies is on ensuring that the infrastructure is provided to support development, particularly with respect to water supply and waste water treatment (both of which could be impacted by climate change). With regard to flood risk, the JLP requires the application of the sequential test and the exception test, and that new development in areas at medium or high risk from flooding will not increase flooding elsewhere. It also requires the incorporation of appropriate sustainable drainage systems.

1.90 A number of site allocations were identified by both the SA and the Strategic Flood Risk Assessment as having the potential for flood risk (using slightly different criteria).

1.91 A considerable amount of research, through the Strategic Flood Risk Assessment, has been undertaken with regard to the potential for sites to experience flooding, and the mitigation required to address such risks. Notwithstanding policy safeguards in the JLP and given the potential impacts of flooding to people and property should it take place, it is

considered that, in line with the precautionary principle, a residual risk remains. Whilst recognising that on a small proportion of individual sites a significant residual risk could remain, overall a **minor negative effect (-)** is recorded against SA Objective 10 (Climate Change Adaptation).

SA Objective 11: To conserve and enhance biodiversity and geodiversity

1.92 The SA considered the effects not only on designated biodiversity sites, but also the potential effects on wider ecological networks including, for example, priority habitats. This is because the wider ecological resource needs to be in a healthy condition for the designated sites to thrive and to maintain overall biodiversity.

1.93 In this regard, a large proportion of the policies in Parts 1 and 2 of the JLP are considered likely to have a positive effect on SA Objective 11, both directly and indirectly. There is considerable emphasis given to policies that safeguard the internationally protected habitats associated with the Stour and Orwell Estuaries, as well as other designated habitats. Furthermore, there are very strong policies in both Part 1 and Part 2 of the JLP that seek, through development to avoid damage to designated sites. There is also an emphasis on restoration and enhancement with the aim of delivering biodiversity net gain.

1.94 However, the SA has identified that a large number of site allocations have a risk of negative effects on biodiversity. In around half of the sites, this risk is significant. This is because of their proximity to designated habitats, including locally designated wildlife sites and priority habitats. However, it is acknowledged in the SA that there is considerable uncertainty in these findings. This is because very few of the site allocations overlap designated sites themselves and in many instances the risks are indirect (e.g. from recreation or pollution) or have the potential to be mitigated by avoiding the most ecologically sensitive parts of the site. Furthermore, in line with policies in Parts 1 and 2 of the JLP, there is the potential for biodiversity enhancements to be created and funded through development, although these are not often clearly identified in the site allocation policies themselves. It should be noted that the Habitats Regulations Assessment has concluded that the JLP will not have an adverse effect on the integrity of the internationally designated sites.

1.95 Given the considerable uncertainty of the potential impacts on biodiversity, the true test will be in the implementation of the policies in Parts 1 and 2 of the JLP when individual site allocations come forward for development. This will need to take into account not only the ecological sensitivities of the allocation site and its environs, but also other pressures placed on the development to fund

other priorities, such as affordable homes, community infrastructure, etc.

1.96 Given the number of site allocations where the potential for a significant negative effect on SA Objective 11 has been identified, it is considered that, in accordance with the precautionary principle, these potential effects should be recognised in the SA. On the other hand, the very strong policies in Parts 1 and 2 of the JLP also need to be recognised.

1.97 Therefore, overall, it is considered that the JLP will have **mixed significant positive and significant negative effects (++)** on SA Objective 11 (Biodiversity and Geodiversity), albeit with considerable uncertainty.

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

1.98 Babergh and Mid Suffolk have a rich historic environment that is reflected in very strong policies in Parts 1 and 2 of the JLP. These seek to avoid harm to heritage assets, including their setting, in the first instance and, only where harm cannot be avoided, the use of appropriate mitigation. The JLP also supports proposals that will result in the re-use/ redevelopment of a heritage asset, subject to certain criteria being met, and proposals that contribute to local distinctiveness, or enhance the environmental performance of heritage assets.

1.99 However, the Heritage Impact Assessment, the findings of which are reflected in the SA, identified a number of site allocations where harm could result to the historic environment, and in some instances significant harm. As a result of the Heritage Impact Assessment, some of the most sensitive sites have been removed from the JLP. Some of the site allocation policies in Part 3 of the JLP include mitigation in response to the findings of the Heritage Impact Assessment. As a result, the majority of allocation sites are now considered to have minor negative effects against SA Objective 12.

1.100 Overall, it is considered that the JLP will have **mixed significant positive and minor negative effects (++)** on SA Objective 12 (Historic Environment).

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

1.101 As with the historic environment, Parts 1 and 2 of the JLP include a number of policies that seek to protect and enhance the landscapes and townscapes of Babergh and Mid Suffolk, recognising that the Plan area contains both nationally important landscapes designated as Areas of Outstanding Natural Beauty, and locally sensitive landscapes and townscapes, characteristic of this part of Suffolk. Specific

policy protection is given to the Dedham Vale Area of Outstanding Natural Beauty and the Suffolk Coast and Heaths Area of Outstanding Natural Beauty. More generally, the JLP seeks to ensure that development integrates positively with the existing landscape character, reinforces local distinctiveness and settlement identity.

1.102 With respect to the site allocations in Part 3 of the JLP, the majority are considered to have a minor negative effect on SA Objective 13, with a few potentially having a significant negative effect, with others either a neutral effect or a positive effect. Some of the site allocation policies provide specific mitigation with respect to landscape/townscape matters.

1.103 Overall, it is considered that the JLP will have **mixed significant positive and minor negative effects (++/-)** on SA Objective 13 (Landscape/Townscape).

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

1.104 Policies in Parts 1 and 2 of the JLP aim to protect and where appropriate expand the existing strategic employment sites, regenerate two strategic sites for new employment uses, and support net additional employment uses along the strategic transport corridors. The JLP also seeks to support proposals for retail and new town centre uses, and the tourist economy, and resist the loss of employment sites.

1.105 A small number of employment sites are allocated in the JLP, and some of the residential sites include provision for small scale employment uses.

1.106 The SA found that the JLP performs well against SA Objective 14, with a number of significant positive and minor positive effects. Some of the more environmentally focussed policies may restrict opportunities for economic development but, conversely, they will also help to protect the special qualities of the Plan area that make it attractive for tourism and inward investment. Although the JLP does not promote great changes to the economy, it provides a policy framework that should allow the economy of the Plan area to flourish.

1.107 Overall, it is considered that the JLP will have a **significant positive effect (++)** on SA Objective 14 (Economic Growth).

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

1.108 Parts 1 and 2 of the JLP include policies that are specifically targeted at the town centres of the Districts. These include not only protection and support for traditional retail uses, but also encouragement of a diverse set of uses, including residential (e.g. 'over the shop') and community, cultural and evening activities.

1.109 The spatial strategy in the JLP guides a significant proportion of development to the Market Towns, although the majority of residential development will take place at other settlements, in particular in the Ipswich Fringe and Core Villages.

1.110 With respect to Part 3 of the JLP, the SA criteria for appraising the effects of development on SA Objective 15 were tightly drawn, such that positive effects will occur if development takes place within walking distance of town centres. This is because, the further away from a town centre development occurs, the more likely it is that residents will look elsewhere for their retail and other needs, including out-of-town facilities, local shops, or places with a larger and wider range offer, such as Ipswich.

1.111 As a result, a large number of site allocations received significant negative effects. The sites with most positive effects, including significant positive effects, were those at the Market Towns or Core Villages with district centres, such as Debenham, but even for some of these settlements, the site allocations sometimes scored negatively due to their distance from the town centre.

1.112 Overall, it is considered that the JLP will have a **mixed significant positive and significant negative effect (++/-)** on SA Objective 15 (Town Centres).

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

1.113 Achieving a marked shift from reliance on the private car to more sustainable modes of transport, particularly public transport, in rural districts is huge challenge. It is not viable to have the frequent and extensive bus networks of larger cities, and as a result routes tend to be restricted, and services infrequent and often with long travel times. Within Babergh and Mid Suffolk, the rail network is also limited, both in terms of destinations and stations.

1.114 The most viable and easily achieved switch to more sustainable modes of travel are through walking and cycling. This means providing homes close to jobs, services and facilities, such as schools, open space, and recreational and health facilities. This is why considerable emphasis was given to these aspects in the SA process.

1.115 Parts 1 and 2 of the JLP include policies that seek to promote more sustainable modes of transport, and these were considered likely to result in positive effects on SA Objective 15, although only a few policies were considered likely to result in significant positive effects. The spatial strategy is considered likely to result in significant positive effects, because of its focus on those settlements with more jobs, services and facilities, although these are more limited locally in the Core Villages and Ipswich Fringe than in the Market

Towns. In addition, the provision for development in the strategic transport corridors could result in greater car use, notwithstanding the train services along some of these routes, particularly between Ipswich and Bury St Edmunds.

1.116 When looking at the site allocations in Part 3 of the JLP, very few sites scored significant negative effects. Quite a few are considered likely to have minor negative effects, but these are outweighed by the number of sites considered likely to have positive effects, with quite a few in Mid Suffolk in particular considered likely to have significant positive effects because of their access to sustainable modes of transport.

1.117 Overall, it is considered that the JLP will have **mixed significant positive and minor negative effects (++/-)** for SA Objective 16 (Sustainable Travel).

Cumulative effects on individual settlements of JLP site allocations

1.118 Chapter 7 (Sustainability Appraisal Findings for the Joint Local Plan) in the main SA Report contains a section on the cumulative effects of site allocations in the JLP on individual settlements.

Cumulative effects with other plans and projects

1.119 Chapter 7 (Sustainability Appraisal for the Joint Local Plan) in the main SA Report contains a section on the cumulative effects of the JLP with development proposed in other plans or projects in Suffolk and in neighbouring authorities.

Recommendations

1.120 During the course of the SA work, a number of recommendations for changes to a working draft of the JLP were provided to BMSDC. Table 7.23 in the main SA Report sets out how the recommendations of the SA were taken into consideration and reflected in the JLP.

Reasons for choosing the plan

1.121 The main SA Report contains a statement prepared by BMSDC in Chapter 7 (Sustainability Appraisal Findings for the Joint Local Plan) on how environmental considerations have been integrated into the Local Plan, how the SA has been taken into account, how consultation responses have been taken into account, the reasons for choosing the adopted Local Plan policies in light of alternative options and the measures that will be taken to monitor the effects of the Local Plan.

Monitoring

1.122 Table 8.1 in the main SA Report sets out a number of suggested indicators for monitoring the potential sustainability effects of implementing the JLP.

Conclusion

1.123 The Babergh Mid Suffolk JLP sets out a framework for development in the Plan area over a 19 year period, from 2018 to 2037. It includes a set of Plan objectives, 10 strategic policies, a series of more detailed development management policies, as well as a large number of site allocations to provide certainty about where development will take place.

1.124 The JLP identifies a need for over 18,000 new homes over the Plan period and provides for over 20,000 homes to be delivered. If just the housing need itself were to be delivered, this would result in around a 20% increase in the total housing stock of the Plan area, built in less than 20 years. This will undoubtedly do a great deal to address the issues of lack of housing and, in particular, affordable housing that people living in the two Districts currently face.

1.125 However, it will place pressure on the environment, both in terms of its assets, such as biodiversity, landscape and the historic environment, and resources such as water. These issues, in particular, have been subject to considerable research and evidence base studies that have informed both the preparation of the JLP and the SA. They have been addressed by some very strong policies in both Part 1 and Part 2 of the JLP with respect to environmental protection and enhancement, and infrastructure provision, which scored very positively in the SA, and which the SA helped to inform and improve.

1.126 The SA has appraised a range of alternative ways of distributing the development across the two Districts. It concluded that a spatial strategy that focuses development on the Market Towns and Urban Areas, being the major employment locations and centres of services and facilities, is likely to prove the most sustainable across the full range of SA Objectives. However, it was noted that there are only five Market Towns in the two Districts, and the part of the urban area of Ipswich that lies within the Babergh Mid Suffolk JLP area is relatively small.

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

1.128 The SA also noted that there will be local needs outside the Market Towns and Urban Areas that need to be provided for, and support for the jobs, services and facilities that they provide. The SA therefore found that there is a good case in sustainability terms to allow for a reasonable proportion of development to be provided at the Core Villages and the Ipswich Fringe (which together account for around 40% of the 2018 housing stock), particularly in sustainable transport corridors, all of which performed similarly across the SA Objectives taken as a whole. However, the SA recommended that a large volume of dispersed development across the smaller settlements should be avoided.

1.129 The spatial distribution of housing development in the JLP is largely in line with the recommendations of the SA. The number of homes to be delivered in the Market Towns and Urban Areas is, on an average number of homes per settlement basis, far higher than any of the other settlement hierarchy categories, with a particular focus on Stowmarket, Sudbury/Great Cornard, and Hadleigh. The SA tested other alternatives for the housing spatial distribution for both Babergh and Mid Suffolk and found that none performed any more strongly against the SA Objectives than the spatial strategy in the JLP.

1.130 The SA noted that, outside the Market Towns and Urban Areas, the focus of development is within the Ipswich Fringe and a small number of Core Villages. In the Ipswich Fringe, the main location of development will be at Sproughton, which offers an opportunity to deliver a series of developments including the regeneration of a former sugar beet factory, linked to the existing Ipswich urban area. Within the Ipswich Fringe, there would also be sizeable development taking place at Barham, Bramford and Copdock and Washbrook. With respect to the Core Villages, the main focus in Babergh is on Capel St Mary on the A14 strategic transport corridor (but with no railway station) between Ipswich and Colchester, and in Mid Suffolk on Elmswell, Thurston and Woolpit which between them offer access to jobs, railway stations, and local shops and services. The SA describes the cumulative effects of the allocations on such settlements.

1.131 The SA recognised that 60% of the housing supply (under Policy SP04 – Housing Spatial Distribution) already has planning consent (rising to around 70% and 75% of housing need for Babergh and Mid Suffolk respectively, under Policy SP01 – Housing Needs), and that the remaining sites in the Strategic Housing and Economic Land Availability Assessment are limited in number. In addition, the SA noted that individual sites may not always perform as well at the settlement level dependent upon particular site characteristics.

1.132 Although the concept of a new settlement was explored through the SA of spatial strategy options, BMSDC did not consider a new settlement to be a reasonable alternative for

this JLP. This was because there is a sufficient supply of proportionate sites in and around existing settlements to meet housing need, and because of the long lead-in and delivery times required to deliver a new settlement. However, the JLP includes provision to consider a new settlement in the next review of the JLP, which is due within five years of adoption of this version of the Plan.

1.133 Despite the strong policy safeguards in Part 1 and Part 2 of the JLP, and a spatial distribution to development that is largely in line with the findings of the SA, there is a more mixed picture with regard to individual site allocations. In general terms, sites (whether allocated or not) that are closest to the Market Towns perform best across the SA Objectives as a whole, followed by the site allocations in the Core Villages and Ipswich Policy Area. Sites in the Hinterland Villages and Hamlets and Countryside perform less well. In this respect, the SA of the site allocations largely endorses the findings of the SA of the spatial distribution. In addition, larger sites tended to perform better than smaller sites. However, when it comes to the actual allocations, it did not necessarily follow that the sites that are allocated at any one individual settlement perform more strongly against the SA Objectives, compared to the sites that are not allocated. Sometimes they do, sometimes they perform similarly, and sometimes they do not perform as well.

1.134 The SA is only one factor taken into account in making decisions, and a large number of sites already have planning consent. The SA, through supporting evidence, did make a difference in deciding which sites should be allocated. For example, a small number of sites that were earmarked for allocation were subsequently discounted due to the potential impact on the historic environment. For some of the potential significant effects identified by the SA and other evidence, mitigation has been incorporated into the site allocation policies.

1.135 In summary, therefore, the JLP seeks to accommodate a substantial increase in development, primarily housing, that reflects the economic, social and environmental characteristics of the two Districts, and its relationship with neighbouring areas. This has largely been achieved, and as a result should deliver a range of significant positive effects across SA Objectives, once the strong policy safeguards in the JLP are taken into account. However, delivery will prove challenging over the years to come, and there are a number of issues, particularly environmental issues, that will require careful planning, management and monitoring, not only on an individual site level, but across the Plan area as a whole. If this is achieved, then there is the potential for the significant negative effects identified by this SA to be avoided or reduced, and the JLP to be successfully implemented in accordance with the principles of sustainable development.

Appendix A

Summary of SA scores for Part 3 of the JLP: Place and Allocations Policies

Table A.1: Summary of SA scores for Part 3 (Place and allocations policies)

Allocation Policy (Sites in <i>italics</i> already have planning consent)	Size	Dwellings	Site ref.	Purpose	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
Policy LS01 (Hinterland and hamlet sites)					+	--	-	++	-	--	-	N/A	--	-	-	-	-	0	--	-
Babergh District																				
<i>LA045: Land South of Tamage Road, Acton</i>	3.5ha	100	SS0177	Residential	+	+	+	+	-	--	--	N/A	+	0	0?	-?	-	0	--	-
<i>LA005: 6 Acre Field, Belstead</i>	1.1ha	14	SS0591	Residential	+	--	+	++	-	--	--	N/A	-	0	--?	-?	-	0	--	+
LA048: Land south of Wattisham Road, Bildeston	3ha	75	SS0278	Residential	++	0	-	++	-	-	-	N/A	-	0	0?	-?	-	0	--	-
LA053: Land south of Ipswich Road, Brantham	8.4ha	125	SS0185	Residential	+	+	-	++	-	--	-	N/A	-	0	--?	-?	-	0	--	-
<i>LA054: Land East of Longfield Road, Capel St Mary</i>	5.56ha	100	SS0251	Residential	++?	-	-	+	-	--	--	N/A	-	0	--?	-?	-	0	--	-
LA055: Land south-west of Rembrow Road, Capel St Mary ¹	26ha	550	SS0637	Residential	++	+	-	+	-	--	-	N/A	+	0	-?	-?	-	0	--	-
			SS0910	Residential	++	+	-	+	-	--	--	N/A	+	-	--?	-?	-	0	--	-
<i>LA041: Land north-west of Waldingfield Road, Chilton</i>	5.98ha	130	SS1121	Residential	+	0?	++	+	--	--	-	N/A	++	-	--?	--?	-	0	--	+

¹ This is a mixed-use allocation. However, it comprises two residential sites. The allocation is 26ha in size and employment accounts for 0.5ha of this. This is such a small proportion of the site that consideration has not been given to the employment site assessment criteria and assumptions.

Allocation Policy (Sites in <i>italics</i> already have planning consent)	Size	Dwellings	Site ref.	Purpose	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/ Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
LA008: Land south east of Back Lane, Copdock & Washbrook	13ha	226	SS0295	Residential	+	+	+	++	--	--	-?	N/A	++	0	--?	-?	--	0	--	+
LA009: Land south west of London Road, Copdock & Washbrook	0.8ha	12	SS0593	Residential	+	-	0	++	--	--	--	N/A	-	0	-?	-?	0	0	--	-
<i>LA059: Land west of Hadleigh Road, East Bergholt</i>	<i>0.85ha</i>	<i>10</i>	<i>SS1197</i>	<i>Residential</i>	-	+	-	+	--	--	-	N/A	-	0	--?	-?	-	0	--	-
<i>LA060: Land north west of Moores Lane, East Bergholt</i>	<i>9ha</i>	<i>144</i>	<i>SS0181</i>	<i>Residential</i>	+	++?	-	++	--	--	-?	N/A	+	0	--?	-?	-	0	--	-
<i>LA061: Land south of Heath Road, East Bergholt</i>	<i>9ha</i>	<i>75</i>	<i>SS0182</i>	<i>Residential</i>	++	+	-	++	--	--	-?	N/A	+	0	--?	-?	-	0	--	-
<i>LA039: Land east of Kings Hill, Great Cornard</i>	<i>0.74ha</i>	<i>8</i>	<i>SS1082</i>	<i>Residential</i>	+	+	++	+	--	--	-	N/A	++	--	--?	-?	0	0	-	++
<i>LA040: Land west of Bures Road, Great Cornard</i>	<i>1.64ha</i>	<i>46</i>	<i>SS0433</i>	<i>Residential</i>	+	++	+	++	-	--	-	N/A	++	0	--?	0?	-	0	--	+
LA042: Land at Tye Farm, Great Cornard	60ha	500	SS0242	Residential	+	++	++	++	--	--	-?	N/A	++	0	-?	-?	--	0	--	+
LA027: Former Babergh District Council Offices, Hadleigh	0.69ha	50	SS0537	Residential	++	+	+	+	--	-	++	N/A	++	-	--?	-?	0	--	++	+
	25ha	600	SS0298	Residential	++	++	++	+	--	--	-	N/A	++	-	--?	-?	--	0	-	0?

Allocation Policy (Sites in <i>italics</i> already have planning consent)	Size	Dwellings	Site ref.	Purpose	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
LA028: Land north east of Frog Hall Lane, Hadleigh ²			SS1035	Employment	N/A	N/A	+	N/A	--	--	-	N/A	+	0	--?	-?	--	++	-	0?
<i>LA115: Angel Court, Angel Street, Hadleigh</i>	0.3ha	21	SS0502	Residential	++	+	+	+	--	-	++	N/A	++	--	-?	0	0	0	++	+
LA114: Land north of Red Hill Road / Malyon Road, Hadleigh	3.2ha	75	SS0584	Residential	+?	+	++	+	-	--	-	N/A	+	-	--?	-?	-	0	--	-
<i>LA068: Land east of Ipswich Road, Holbrook</i>	0.3ha	7	SS0717	Residential	++	++	-	+	--	--	--	N/A	+	0	--?	-?	-	0	--	-
LA069: Land north west of Melford Road, Lavenham	0.57ha	20	SS0288	Residential	+	-	-	+	--	--	-	N/A	+	0	0?	-?	-	0	--	+
LA098: Land south of High Road, Leavenheath	5.29ha	40	SS0587	Residential	+	--	--	++	-	--	--	N/A	--	0	0?	-?	-	0	--	-
<i>LA113: Land east of the B1064, Long Melford</i>	8.5ha	150	SS0812	Residential	++	-	0	+	--	--	--	N/A	+	0	--?	-?	--	0	--	-
LA075: Land south of The Street, Shotley	2.96ha	50	SS0208	Residential	++	+	0	++	-	--	--	N/A	+	0	-?	-?	-	0	--	-
LA012: Land north of Burstall Lane and west of B1113, Sproughton	10.6ha	105	SS0223	Residential	+	+	+	++	-	--	-	N/A	++	--	--?	-?	-	0	--	+

² This is a mixed-use allocation.

Allocation Policy (Sites in <i>italics</i> already have planning consent)	Size	Dwellings	Site ref.	Purpose	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
LA013: Land north of the A1071, Sproughton	47.6ha	800	SS0191	Residential	++	+	++	++	--	--	--	N/A	++	0	--?	-?	-	0	--	+
			SS0954	Residential	+	+	+	++	-	--	--	N/A	++	0	0?	-?	-	0	--	+
			SS1024	Residential	++	+	++	++	--	--	--	N/A	++	-	--?	-?	-	0	--	+
<i>LA014: Land at Poplar Lane, Sproughton³</i>	12ha	475 ⁴	SS0299	<i>Residential</i>	+++?	+?	++	++	--	--	--	N/A	++	0	--?	-?	0	+	--	+
LA018: Land at Former Sugar Beet Factory Site, Sproughton	50ha	N/A	SS0721	Employment	N/A	N/A	+	N/A	--	--	++	N/A	++	-	--?	-?	0	++	--	+
LA116: Land east of Loraine Way, Sproughton	3.4ha	50	SS0711	Residential	+	+	+	++	-	--	-	N/A	++	0	--?	-?	-	0	--	+
<i>LA016: Land West of Bourne Hill, Wherstead</i>	8.25ha	75	SS1020	<i>Residential</i>	+++?	-	++	++	--	--	--	N/A	++	-	--?	-?	-	0	--	++
Mid Suffolk District																				
<i>LA046: Former Bacton Middle School, Bacton</i>	4.43ha	50	SS0088	<i>Residential</i>	++	+?	-	++	--	-	-	N/A	+	0	0	-?	+	0	--	-
<i>LA047: Land north east of Turkey Hall Lane, Bacton</i>	4.54ha	51	SS0099	<i>Residential</i>	+	-	-	+	--	--	-	N/A	-	--	-?	-?	-	0	--	-

³ This is a mixed-use allocation. However, it comprises one residential site. Therefore, the employment site assessment criteria and assumptions have been applied to SA14.

⁴ Includes 4ha employment land.

Allocation Policy (Sites in <i>italics</i> already have planning consent)	Size	Dwellings	Site ref.	Purpose	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
<i>LA106: Land south of Pretyma Avenue, Bacton</i>	5.37ha	85	SS0518	Residential	+++?	+?	-	+	--	-	-	N/A	+	0	-?	-?	-	0	--	-
<i>LA105: Land north of Church Road, Bacton</i>	4.7ha	81	SS0266	Residential	++	+?	-	++	--	-	-	N/A	+	0	0	--?	+	0	--	-
<i>LA119: Land north of Pesthouse Lane, Barham</i>	1.7ha	20	SS1056	Residential	+?	-?	+	++	--	--	++	N/A	+	--	--?	0?	0	0	--	+
<i>LA049: Land south of Back Hills, Botesdale & Rickinghall</i>	3ha	40	SS0129	Residential	++	0	-	++	--	--	-	N/A	+	-	--?	--	-	0	--	-
<i>LA050: Land north of Gardenhouse Lane, Botesdale & Rickinghall</i>	1.5ha	42	SS1190	Residential	+	+?	-	+	--	-	-	N/A	+	0	0	-?	-	0	--	-
<i>LA052: Land north of Mill Road, Botesdale & Rickinghall</i>	2.8ha	69	SS0949	Residential	++	0	-	++	-	--	-	N/A	+	--	--?	-?	-	0	--	-
<i>LA006: Land south of Fitzgerald Road, Bramford</i>	4.18ha	100	SS0121	Residential	+	+	+	+	--	--	--	N/A	++	0	-?	-?	-	0	--	+
<i>LA007: Land east of The Street, Bramford</i>	9.3ha	190	SS0478	Residential	+	--	+	+	--	--	--	N/A	+	--	--?	-?	-	0	--	+
<i>LA107: Land east of Bramford Road, Bramford</i>	2.1ha	14	SS0636	Residential	+	+	++	+	--	--	-	N/A	++	0	-	-?	0	--	--	+
<i>LA001: Land east of Norwich Road, Barham</i>	10.6ha	325	SS0551	Residential	++	0	+	++	--	--	--	N/A	++	0	-?	-?	--	0	--	+

Allocation Policy (Sites in <i>italics</i> already have planning consent)	Size	Dwellings	Site ref.	Purpose	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/ Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
LA002: Land north of Church Lane, Barham	24.9ha	270	SS0076	Residential	++	++	+	++	--	--	--?	N/A	++	0	--?	-?	--	0	--	+
LA003: Land south of Church Lane, Claydon	6.2ha	75	SS0861	Residential	++	++	+	++	--	--	-	N/A	++	-	--?	-?	-	0	--	-
LA056: Land south of Low Road, Debenham	1ha	18	SS0902	Residential	++	0	-	+	--	-	-	N/A	+	--	--?	-?	-	0	++	+
LA057: Land north of Ipswich Road, Debenham	4ha	140	SS0031	Residential	++	0	-	+	--	-	-	N/A	+	-	--?	-?	-	0	++	+
LA058: Land east of Aspsall Road, Debenham	2.5ha	87	SS0268	Residential	++	++	-	+	--	-	-	N/A	+	0	--?	-?	-	0	++	+
<i>LA062: Land east of Ashfield Road, Elmswell</i>	<i>4.09ha</i>	<i>106</i>	<i>SS0085</i>	<i>Residential</i>	+	-	-	++	--	--	-	N/A	-	0	0	--?	-	0	--	+
<i>LA063: Land south of Church Road, Elmswell</i>	<i>2.62ha</i>	<i>38</i>	<i>SS0096</i>	<i>Residential</i>	+	0	0	+	--	--	-	N/A	+	--	0	0?	-	0	--	+
LA064: Land north of Church Road, Elmswell	2.94ha	60	SS0039	Residential	+	-	0	+	--	--	--	N/A	0	0	-?	-?	-	0	--	++
LA065: Land north west of School Road, Elmswell	4.2ha	50	SS0107	Residential	+	0	0	+	--	--	-	N/A	+	0	0	-?	-	0	--	++
LA066: Land west of Station Road, Elmswell	4.18ha	100	SS0132	Residential	+	-	0	+	--	--	-	N/A	+	0	0	-?	-	0	--	++
LA020: Land north of Magdalen Street, Eye	2.5ha	80	SS1118	Residential	+++?	++	+	+	--	0	++	N/A	++	0	--?	-?	?	--	++	+

Allocation Policy (Sites in <i>italics</i> already have planning consent)	Size	Dwellings	Site ref.	Purpose	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
LA021: Land north of Church Street, Eye	0.34ha	12	SS0672	Residential	+	++	+	+	-	0	++	N/A	++	0	-?	-?	0	0	++	+
LA099: Land at Eye Airfield, Eye	64ha	N/A	SS0928	Employment	N/A	N/A	+	N/A	--	-	-	N/A	+	--	--?	-?	-	++	--	+
LA109: Land south of Eye Airfield, Eye	7.1ha	174	SS1202	Residential	+?	+	++	+	-	0	-	N/A	++	-	-?	-	--	0	--	+
LA110: Land north of Millfield, Eye	1.3ha	34	SS0614	Residential	+?	+	++	+	-	0	-	N/A	++	0	0	-?	-	0	+	+
LA111: Allotments north of Millfield, Eye	1.4ha	72	SS0615	Residential	+++?	+	+	+	-	0	-	N/A	++	0	0	-?	-	0	+	+
LA010: Land south of Chalk Hill Lane and West of Hood Drive, Great Blakenham	0.7ha	8	SS0654	Residential	+	-	+	++	-	--	--	N/A	0	-	--?	-?	-	0	--	-
<i>LA067: Land South of Bacton Road, Haughley</i>	<i>4ha</i>	<i>98</i>	<i>SS0004</i>	<i>Residential</i>	+	0	-	++	--	--	-	N/A	-	0	--?	-?	-	0	--	-
<i>LA104: Land West of Fishponds Way, Haughley</i>	<i>2.8ha</i>	<i>98</i>	<i>SS0047</i>	<i>Residential</i>	+	-	-	++	--	--	--	N/A	-	-	--?	-?	-	0	--	-
<i>LA117: Land north of Station Road, Haughley</i>	<i>1.3ha</i>	<i>29</i>	<i>SS0270</i>	<i>Residential</i>	+	-	-	++	--	-	--	N/A	-	0	0	0?	-	0	--	-
LA073: Land south of Glebe Way, Mendlesham	5.3ha	75	SS0065	Residential	+++?	+	-	++	--	-	-	N/A	+	-	0?	-?	-	0	--	-

Allocation Policy (Sites in <i>italics</i> already have planning consent)	Size	Dwellings	Site ref.	Purpose	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
<i>LA030: Land west of Stowmarket Road, Needham Market</i>	2.1ha	66	SS1199	Residential	+	--	+	+	--	--	-	N/A	+	0	-?	-?	--	0	+	+
<i>LA031: Former Needham Market Middle School, Needham Market</i>	1.26ha	41	SS0669	Residential	++	0	+	+	--	--	++	N/A	++	-	--?	--?	0	0	++	++
<i>LA032: Former Mid Suffolk District Council Offices and Car Park, Needham Market</i>	2.62ha	94	SS0530	Residential	+	0	+	+	--	--	++	N/A	++	0	--?	--?	0	--	++	++
			SS1005	Residential	+	-	+	+	--	--	++	N/A	+	0	-?	0?	+	0	++	++
LA076: Land south of The Street, Stonham Aspal	1.9ha	35	SS0141	Residential	+	0	-	++	--	-	-	N/A	-	0	-?	-?	-	0	--	-
<i>LA033: Land south of Gun Cotton Way, Stowmarket</i>	3ha	68	SS0064	Residential	+?	0?	++	+	--	--	--	N/A	++	0	--?	-?	0	0	-	+
<i>LA034: Chilton Leys, Stowmarket</i>	33ha	600	SS1022	Residential	++	++?	-	++	--	-	--	N/A	++	-	--?	-	--	0	--	-
LA035: Ashes Farm, Stowmarket	22.8ha	575	SS0264	Residential	++	+	++	++	--	--	--?	N/A	++	-	-?	--?	-	0	+	++
LA036: Land south of Union Road, Stowmarket ⁵	23.3ha	400	SS0029	Residential	++	++	+	++	--	--	-	N/A	++	0	-?	-?	-	0	--	+
			SS0157	Residential	+	++	0	++	--	--	-	N/A	+	0	-?	-?	-	0	--	+

⁵ Sites SS0029 and SS0157 were both allocated in the Stowmarket Area Action Plan (2013) and 300 of the 400 dwellings have planning consent (i.e. are committed).

Allocation Policy (Sites in <i>italics</i> already have planning consent)	Size	Dwellings	Site ref.	Purpose	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
LA037: Former Stowmarket Middle School, Stowmarket	1ha	40	SS0101	Residential	++	++	+	+	--	-	++	N/A	++	0	0?	0?	0	0	++	++
LA038: Land south of Creting Road West, Stowmarket	0.88ha	25	SS0668	Residential	+	+	++	+	--	--	++	N/A	++	-	-?	0?	0	0	+	++
LA044: Land at Mill Lane, Stowmarket ⁶	52ha	N/A	SS1223	Employment	N/A	N/A	+	N/A	--	-	-?	N/A	++	-	--?	-?	-	++	--	+
<i>LA112: Land east and west of Prentice Road, Stowmarket</i>	<i>0.76ha</i>	93	SS1288	<i>Residential</i>	+	0	++	+	--	--	-	N/A	++	-	--?	-?	0	0	++	++
<i>LA108: Land south of Gun Cotton Way, Stowmarket</i>	<i>11ha</i>	<i>N/A</i>	SS1032	<i>Employment</i>	N/A	N/A	+	N/A	--	--	--	N/A	++	-	--?	0?	0	+	-	++
<i>LA077: Land south of Church Road, Stowupland</i>	<i>1.55ha</i>	18	SS0151	<i>Residential</i>	+	++	0	++	--	-	-	N/A	+	0	0	-?	-	0	--	+
LA078: Land south of Stowmarket Road, Stowupland	17.8ha	300	SS1071	Residential	+	++	+	++	--	--	-	N/A	++	-	-?	-?	--	0	--	+
<i>LA100: Land north of B1115, Stowupland</i>	<i>8.14ha</i>	143	SS0073	<i>Residential</i>	+	+	+	++	--	--	-	N/A	++	--	0	-?	-	0	--	++
LA080: Land west of Queen Street, Stradbroke	3.2ha	75	SS0079	Residential	+++?	++	-	+	-	-	-	N/A	+	-	--?	--?	-	0	--	-

⁶ Site SS1223 was allocated in the Stowmarket Area Action Plan (2013).

Allocation Policy (Sites in <i>italics</i> already have planning consent)	Size	Dwellings	Site ref.	Purpose	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/ Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
LA081: Land north of Laxfield Road, Stradbroke	2ha	45	SS1198	Residential	+	+	-	+	--	-	-	N/A	-	--	--?	-?	-	0	--	-
<i>LA082: Land south of New Street, Stradbroke</i>	<i>4.2ha</i>	<i>60</i>	<i>SS1043</i>	<i>Residential</i>	++	++	-	+	-	-	-	N/A	+	--	-?	-?	-	0	--	-
LA083: Land east of Farriers Close, Stradbroke	1.7ha	35	SS0681	Residential	++	++	-	+	-	-	-	N/A	+	-	-?	-?	-	0	--	-
<i>LA084: Land west of Meadow Lane, Thurston</i>	<i>3.27ha</i>	<i>64</i>	<i>SS0019</i>	<i>Residential</i>	+	++?	-	+	--	--	-	N/A	+	0	-?	-?	-	0	--	++
LA085: Land east of Church Road and south of Old Post Office Lane, Thurston	1.98ha	25	SS0090	Residential	+	+	-	+	--	--	-	N/A	+	0	-?	-?	-	0	--	+
LA086: Land south of Heath Road, Thurston	4.3ha	110	SS0319	Residential	0	+	+	++	--	--	-	N/A	+	0	-?	-?	-	0	--	++
LA087: Land south of Beyton Road, Thurston	7.9ha	200	SS0729	Residential	+	++	0	+	--	--	-	N/A	+	-	--?	0?	-	0	--	++
<i>LA088: Land west of Ixworth Road, Thurston</i>	<i>13ha</i>	<i>250</i>	<i>SS0716</i>	<i>Residential</i>	+?	+	-	++	--	--	--	N/A	+	0	0	-?	-	0	--	+
LA089: Land east of Ixworth Road, Thurston	8.7ha	200	SS0075	Residential	+	+	-	+	--	--	--	N/A	+	0	0?	-?	-	0	--	++
<i>LA090: Land west of Barton Road, Thurston</i>	<i>5.2ha</i>	<i>129</i>	<i>SS0006</i>	<i>Residential</i>	+	+	0	+	--	--	-	N/A	+	0	--?	-?	-	0	--	+

Allocation Policy (Sites in <i>italics</i> already have planning consent)	Size	Dwellings	Site ref.	Purpose	SA1: Health and Wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/ Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
<i>LA103: Land South of Barrells Road, Thurston</i>	1ha	6	SS0008	Residential	+	+	-	+	--	--	-	N/A	-	0	0	0?	-	0	--	-
<i>LA118: Land west of Church Road, Thurston</i>	3.8ha	15	SS0765	Residential	+	++	-	+	--	--	-	N/A	+	--	--?	-?	-	0	--	++
<i>LA091: Land west of Wattisfield Road, Walsham le Willows</i>	2.7ha	60	SS0040	Residential	-	+?	-	++	-	--	-	N/A	-	0	0	0?	-	0	--	-
<i>LA092: Land east of Wattisfield Road, Walsham le Willows</i>	0.53ha	22	SS0369	Residential	-	+?	-	++	-	-	-	N/A	-	0	0	0?	-	0	--	--
<i>LA102: Land west of Old Norwich Road, Whitton</i>	10ha	190	SS0033	Residential	+?	-	++	+	--	--	-	N/A	+	--	--?	-?	-	0	--	+
<i>LA093: Land East of Green Road, Woolpit</i>	2.3ha	49	SS0093	Residential	++	+?	+	+	--	--	-	N/A	++	0	0	-?	-	0	--	+
<i>LA094: Land South of Old Stowmarket Road, Woolpit</i>	6.52ha	120	SS0547	Residential	++	+?	+	+	--	--	-	N/A	++	0	--?	-?	-	0	--	+
<i>LA095: Land north east of The Street, Woolpit</i>	36.2ha	500	SS0670	Residential	++	+	+	+	--	--	-?	N/A	++	0	-?	-?	--	0	--	+
<i>LA097: Land west of Heath Road, Woolpit</i>	1.7ha	30	SS0783	Residential	++	+	+	+	--	--	-	N/A	++	--	0	-?	-	0	--	+
<i>LA120: Lawn Farm, Woolpit</i>	17ha	N/A	SS0773	Employment	N/A	N/A	+	N/A	--	--	--	N/A	-	-	--?	-?	--	++	--	-