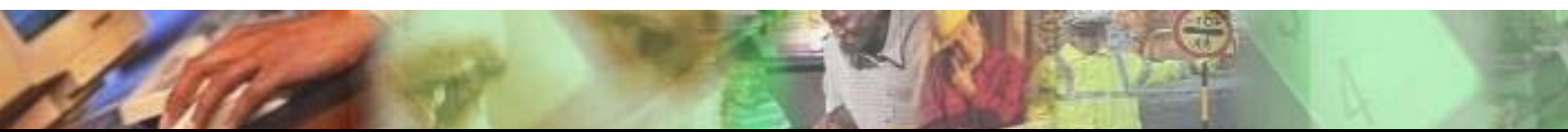# Suffolk County Council

**Sustainability Appraisal of
Core Strategy and Development Policies
(Preferred Options)**

**For the Suffolk Coastal District Council
Local Development Framework**

December 2007

CONTENTS

TABLES

FIGURES

APPENDICES

1. SUMMARY AND OUTCOMES

1.1. Non-Technical Summary

The aim of sustainability appraisal is to promote sustainable development by ensuring environmental, social, and economic factors are considered during plan preparation. It is a statutory requirement stemming from the Planning and Compulsory Purchase Act 2004, the same act that replaced Local Plans with the Local Development Framework. In addition European Directive 2001/42/EC, requires Strategic Environmental Assessment to be undertaken to assess the effects of plans and programmes specifically on the environment. Government guidance (2005) requires Sustainability Appraisal and Strategic Environmental Assessment to be undertaken together as the processes are very similar. Sustainability Appraisal encompasses Strategic Environmental Assessment as the former looks at environmental, social and economic impacts.

This report sets out the results of the sustainability appraisal of Suffolk Coastal District Council's Core Strategy and Development Control Policies, a Development Plan Document that will when formally adopted, form part of its Development Plan Framework.

Baseline information on key aspects of the environment, economy and society published in the Scoping Report (2006) have been updated and showed significant change. Access to services in rural areas has dropped below the County average, there is now an Air Quality Management Area in the District and the business formation rate is relatively low.

Twenty three sustainability objectives spanning environmental, social and economic factors were used in the appraisal. Their compatibility with the 15 plan objectives revealed a high level of sustainability was ingrained in the plan objective wording. Three plan objectives (new housing, meeting housing demand and economic development) had more negative compatibilities with SA objectives than positive but these can be mitigated through actions that seek to avoid particular types of sites. One objective (rural economy) had the same number of negative and positives signifying that in rural areas it may be difficult to achieve economic sustainability objectives without some cost to soil resources as there is often less brownfield land available in rural than urban areas. Concerns are documented regarding wording of two plan objectives.

Twenty four policies were appraised, most with several alternatives. Three policies were outscored by alternatives and the following concluded:
- Policy CS1 (sustainable development) could be amended to place more focus on reducing poverty and social exclusion, opportunities for employment, water and soil quality, bio/geodiversity and achieving economic growth.
- Policy CS5 (affordable housing) was outscored by the alternatives that suggested a higher level of affordable housing but Suffolk Coastal's target level of 24%, although being below the Regional Spatial Strategy target of 35%, stemmed from a recent Local Housing Needs Survey. It is recommended that this be checked for coverage of affordable very sheltered housing need given the aging population profile of the District and kept under regular review.
- Policy CS9 (tourism) was outscored by the alternative of continuing with existing policy. A solution to this is for the policy to include the aim of assessing proposals against their environmental impact.

Recommendations are made for amendments to other policies on the basis of factors they were out scored on by alternatives.

1.2. Likely Significant Effects

The overall conclusion is the implementation of the preferred policies as a group of policies that can act in tandem, are appraised as having the potential to improve sustainability in Suffolk Coastal in the long term. Most likely significant effects appear to be for offering everybody the opportunity for employment, achieving sustainable levels of prosperity and economic growth throughout the plan area and encouraging efficient patterns of movement in support of economic growth. Improving the health of the population, maintaining and improving air quality and conserving and enhancing the quality and local distinctiveness of landscapes and townscapes are also strong likely outcomes.

The specific policy recommendations could further improve the level of sustainability. There are only two general concerns:
- The lack of a strong policy to conserve soil resources and quality
- The general level of protection given to the special qualities of the Area of Outstanding Natural Beauty, (as opposed to landscape in general).

Both of these reflect national policy, so are not required to be repeated in DPD policies. However it would be helpful to plan users to be reminded of this in the supporting text of the plan.

The availability of brownfield land in settlements has been assessed and land allocations made accordingly but there still needs to be a clear requirement for a sequential approach to the development of land to be considered as proposals arise. The plan as a whole does not have a strong policy to conserve soil resources and quality. The overall score is 0 for this Sustainability objective although 4 policies have a brief reference. These references are not specific e.g. CS2 "conserve and enhance the natural and built environment" or CS 17 "Ensure prudent use of natural resources". To make better use of previously developed land is mentioned in the overall objective of the settlement policy but this is directed at housing allocations only. There is no clear statement that a sequential approach will be taken, looking to develop brownfield before greenfield as far as possible. The Secretary of State's Proposed Changes and Further Proposed Changes to the Draft Revision to the Regional Spatial Strategy for the East of England (RSS) October 2007 includes in policy SS2 a requirement for LDDs to develop policies which "adopt an approach to the location of major development which prioritises the re-use of previously developed land …with an overall target for 60% of development to be on previously developed land (PDL). Whilst the availability of PDL has been taken into account in the development of proposals for the location of housing development in Suffolk Coastal (as evidenced by the supporting text to CS4), there is no overall policy prioritising use of PDL or local target set.

The Area of Outstanding Natural Beauty is specifically protected from tourism development but needs to be protected from all other types of development as these could equally damage this unique environmental resource. Acknowledgement of this in the supporting text to CS 15 Landscape is needed as a minimum.

Whilst in many cases the preferred policies put forward in the core strategy were assessed as being entirely positive against the 23 sustainability objectives, on 31 occasions they were found to have negative impacts. In some cases, these impacts can be mitigated to the extent whereby the impact is removed entirely, though in others it may be only partially mitigable, or not at all.

Many of the negative scores were related to the location of development for housing or employment land. These consisted of concerns over the use of greenfield sites, location in flood risk zones, and potential damage to biodiversity, archaeological sites, conservation areas and landscapes. However, some of these issues are mitigated, as policies exist to specifically deal with the flood risk (CS20), biodiversity (CS14) and landscape (CS15) and

sympathetic design of new buildings (CS16). Careful site selection (i.e. using brownfield land and avoiding protected sites) would also help mitigate the sustainability impacts but these are not strongly reflected in policies. Archaeological sites, Conservation Areas, and Listed Buildings are not specifically mentioned in policies – only general statements are made about the protection of the natural and built environment which do not reflect the specific assets that are in Suffolk Coastal.

A further issue regarding new development was an increase in waste production and energy use. Whilst this may be seen as an inevitable consequence of development, both are possible to mitigate and are covered by CS17 (construction). New developments could be required to produce a certain amount of renewable energy (e.g. through wind turbines or by using CHP systems) and meet stringent energy efficiency standards. Policy CS18 (renewable energy) is cautious in its support for renewable schemes – it could be used to support community facilities but is less explicit in support for household level facilities such as solar panels. In terms of waste, developments could require a waste plan, and ensure that there is sufficient space made for a range of recycling facilities. Policy CS17 seeks minimisation of waste and recycling and is adequate mitigation.

A few likely effects cannot be directly mitigated so proposals are made for monitoring.

1.3. Difference the process has made
This Sustainability Appraisal has provided an independent assessment of the Core Strategy Preferred Options paper and has therefore provided an initial check on the sustainability as envisaged by government and EU guidance.

This assessment now permits Suffolk Coastal District Council the opportunity to review their strategy and vision for the District alongside the result of public consultation on the Core Strategy.

1.4. How to comment on the report
If you would like to comment on this report, please contact:

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2. APPRAISAL METHODOLOGY

2.1. Approach to Sustainability Appraisal

Sustainability appraisal (SA) is an iterative process that follows the various stages of plan preparation. It is a statutory requirement stemming from the Planning and Compulsory Purchase Act 2004, the same act that replaced Local Plans with the Local Development Framework (LDF). In addition European Directive 2001/42/EC, transposed into UK law in July 2004, requires Strategic Environmental Assessment (SEA) to be undertaken to assess the effects of plans and programmes specifically on the environment. Government guidance (2005) requires SA and SEA to be undertaken together as the processes are very similar. SA encompasses SEA as the former looks at environmental, social and economic impacts.

The stages in developing the SA of the policies in Suffolk Coastal's Core Strategy are set out below.

Table 2.1: The stages of a Sustainability Appraisal

Stage A: Setting the context and establishing the baseline
1. Identifying other relevant plans, programmes and environmental protection objectives
2. Collecting baseline information
3. Identifying environmental problems
4. Developing SEA objectives and testing their compatibility
5. Consulting on the scope of the SEA
Output: Scoping Report
Stage B: Developing and refining alternatives and assessing effects
1. Testing the plan objectives against the SEA objectives
2. Appraising strategic alternatives
3. Predicting the effects of the plan, including alternatives
4. Evaluating the effects of the plan, including alternatives
5. Mitigating adverse effects
6. Proposing measures to monitor the environmental effects of implementing the plan
Stage C: Preparing the Sustainability Appraisal Report
1. Preparing the Sustainability Appraisal Report
Output: **Sustainability Appraisal Report**
Stage D: Consulting and decision making
1. Consulting on the draft plan and Sustainability Appraisal Report
2. Appraising significant changes
3. Appraising significant changes resulting from representations at the DPD Examination
4. Decision making and provision of information
Output: Sustainability Appraisal Statement
Stage E: Monitoring implementation of the plan
1. Finalising aims and methods for monitoring
2. Responding to adverse effects
Output: Included in Annual Progress Report on Plan implementation

The following summarises the approach taken at each stage of the appraisal.

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope
Suffolk Coastal published a *Sustainability Appraisal Scoping Report for Core Strategy and Policies and Site Specific Allocations* in February 2006. Following consultation, the scoping report was revised and republished in June 2006. In March 2006 the *Core Strategy (including Development Control Policies) and Site Specific Allocations and Policies* was published. A consultation was held on the document between March and May 2006. In

undertaking the SA of the Core Strategy preferred options baseline data has been updated and consultation comments reviewed for relevance to the SA objectives.

<u>Stage B: Developing and refining options and assessing effects</u>
The SA originally commenced looking at the options published in the Core Strategy Issues and Options paper published in February 2007. However Suffolk Coastal District Council (SCDC) continued to refine objectives and policies as they took papers on the results of consultation to Councillors during 2007. A draft set of preferred options was available for appraisal in November 2007 and it was agreed that these should be assessed alongside realistic alternatives taken from the Issues and Options paper. As government guidance says (ODPM 2005 p14) "A SA need not be done in any more detail, or using more resources, than is useful for its purpose" . It was considered that what would be helpful I taking the process of plan development forward would be an assessment of the emerging policies their collective impact.

<u>Stage C: Preparing the Sustainability Appraisal Report</u>
The Sustainability Appraisal for Regional Spatial Strategies and Local Development Documents guidance published by the ODPM (now the Department for Communities and Local Government) has been used in preparing this report. Regular discussions took place with SCDC staff to help refine understanding of policies to assist their appraisal in terms of sustainability. The SA Report has been produced to go out with the DPD for public consultation.

<u>Stage D: Consulting on draft DPD and Sustainability Appraisal Report</u>
SCDC will consult with the public, statutory consultees, stakeholders and any other interested parties on the Preferred Options and the Sustainability Appraisal. Comments received on both documents will be taken into consideration when refining the plan policies and SCDC will deal with appraising any significant changes to the plan.

2.2. Who carried out the Sustainability Appraisal
The sustainability appraisal was carried out by the Research and Monitoring team within the Environment & Transport directorate at Suffolk County Council.

2.3. Who was consulted, when and how
The SA Scoping Report went to consultation in February 2006, and was sent to the statutory bodies, i.e. the Environment Agency, English Heritage, the Countryside Agency and English Nature (before their merger), as well as Suffolk County Council. The responses are shown in Table 2.2 overleaf. Following the responses, the document was updated and went out to a second period of consultation in June 2006. Only two responses were received, shown in Table 2.3.

Whilst most recommendations were acted upon in the updated June 2006 Scoping Report, a few were not. This SA has carried out more of the recommendations that were not acted upon in the update of the February 2006 Scoping Report (recorded in Table 2.2), including the scoping of the documents recommended by the Environment Agency which are available, i.e. the East Suffolk Catchment Flood Management Plan and PPS25 (see **Appendix 3**), though the others (the Suffolk Estuarine Flood Management Strategies, the Alde, Ore and Deben Flood Risk Study and the Thorpeness to Hollesley Strategy Plan) are still not available.

Table 2.2: February 2006 scoping report consultation responses

Consultee	Comments	Response
Countryside Agency	- Information on which local PPPs are to be scoped should be included (paragraph 2.05) - *Suffolk Coast & Heaths AONB Management Strategy* needs scoping - Lack of data on greenspace or rights of way. Open access land data available on internet (link provided) - Area of AONB is not a suitable indicator as it is unlikely to change. An indicator on quality is more important. May be available from Suffolk Coast & Heaths Partnership. - Want an indicator dealing with landscape character and character change in the wider countryside. CA may be able to offer guidance through *Countryside Quality Counts* initiative. Maintenance of landscape character in the face of development may be an issue.	- - Document scoped - Do at site specific stage - Not currently available - Landscape Character maps will be used at site specific stage

English Heritage	- The following indicators should be added:
	  - Number of designated sites lost or adversely affected by development (including their settings)
	  - Number of buildings taken of the BAR register annually.
		- Added to SEA indicators

English Nature	- Delete last sentence of section 2.23 - Changes to SEA objective 16: First sub-objective should read "Will it maintain and enhance **statutory and non-statutory** sites designated for their nature conservation interests?" The second one should read Will it help deliver the targets and actions for habitats and species within the Suffolk Biodiversity Action Plan, **particularly those protected under national and international law**?", and the third indicator for this sub-objective should read "Development proposals **directly or indirectly** affecting BAP habitats, **BAP species and legally protected species** outside protected areas.	- Sentence deleted - Changes made

Environment Agency	- Need to scope *East Suffolk Catchment Flood Management Plan*, the *Suffolk Estuarine Flood Management Strategies,* the *Alde, Ore and Deben Flood Risk Study*, the *Thorpeness to Hollesley Strategy Plan* and *PPS25*
	- Completion of the Strategic Flood Risk Assessment for Suffolk Coastal will aid the SA
	- English Nature's biodiversity vulnerability analysis could be used to demonstrate habitat sensitivity
	- Council may wish to carry out an environmental sensitivity assessment
	
	- The following indicators should be added:
	  - Planning permissions granted that results in the loss of landscape features being identified as being of importance to distinctive character for the area (based on Landscape Character Assessment)
	  - Planning permissions granted for development that would result in the loss of landscape features such as hedges and copses.
	- Commentary should be provided on testing the LDF objectives against the Sustainability Appraisal
		- Those available scoped
		
		- No action
		- Consider at site specific stage
		
		- Added to indicators
		
		- No action
		
		- Commentary is

[1] The documents were not scoped in the revised June 2006 scoping report, but two have been scoped in this sustainability appraisal

Consultee	Comments	Response
	objectives in interested of transparency. - Schedule 2 of the SEA Regulations 2004 sets out the information that must be presented in an Environmental Report.	provided - Quality Assurance Checklist included in this report.
Suffolk County Council	- Might be worth mentioning section E of the SA process in paragraph 1.04 - Is paragraph 1.12 referring to Suffolk's Environment Report? If so, needs making clear. - Is the Suffolk Partnership referred to in paragraph 1.14 the SSAG group? If so, needs making clear. - Stages of Sustainability Appraisal process listed in paragraph 1.17 are out of date. New stages listed. - More data is needed in the baseline data section. - Typo in paragraph 2.24. - Environment Report referred to on page 15 should be Sustainability Appraisal Report. - Draft PPS10 is now out in full form (for scoped documents)	- No action - No action - No action - No action - Now updated - Fixed - Corrected - Document scoped

Table 2.3: June 2006 scoping report consultation responses

Consultee	Comments	Response
Countryside Agency	Pleased to see some changes have been made in response to first consultation. However, where they have not been acted on, original comments still stand.	See above
English Nature	Need to consider the potential biodiversity and/or geological value of brownfield sites.	- County ecologist aware of this issue

The Core Strategy Issues and Options Paper was sent to all parish councils in the district, all parish councils of parishes adjoining the district, and the consultees below:

Anglian Water, Association of British Insurers, Babergh District Council, British Energy, British Nuclear Group, Defence Estate East, Defence Estates, the East of England Development Agency (EEDA), the East of England Regional Assembly (EERA), EDF Energy, English Heritage, the Environment Agency, Essex & Suffolk Water, Essex County Council, GO-East, the Health & Safety Executive, the Highways Agency, Ipswich Borough Council, MEPs and MPs representing Suffolk Coastal, Mid Suffolk District Council, Mitel Telecoms Ltd, the Mobile Operators Association, the National Grid, Natural England, Network Rail, Orange Plc, the Planning Inspectorate, Powergen, the Strategic Health Authority, Suffolk County Council, the Suffolk East Primary Care Trust, the Suffolk Primary Care Trust, the Theatres Trust and Waveney District Council.

The consultation on the Core Strategy was held between February and April 2007.

Replies were received from 123 parish, district and county councils, agencies, companies and individuals.

A summary of the comments received that were considered also relevant to the SA were provided by SCDC. These are set out in Table 2.4 along with the response considered relevant to preparing the SA . SCDC response to the issues raised in terms of developing plan policy is included in reports to Councillors (Local Development Framework Panel) made in the autumn of 2007. https://apps3.suffolkcoastal.gov.uk/committeeminutes/

The key actions taken regarding the sustainability appraisal include:

- SA Objective 17 updated to include reference to geodiversity
- Concerns about the following are noted but are not included in the issues list because information on the scale of the problems are not currently available:
    - the protection of the marine environment
    - protection of woodland from land use change
    - the need to consider the role of semi-natural habitat in Suffolk Coastal.
    - the need for very sheltered housing to be included in consideration of social housing
    - evidence of the plan encouraging the movement of freight by rail.

Table 2.4: Core Strategy consultation responses

Consultee	Comments	SA Response
Highways Agency	**Objecting to Objective 1 (Sustainable Development and Sustainable Communities)** Encourages the Council to adopt a strategy that seeks to locate new development in sustainable locations where day to day facilities were readily accessible by public transport, walking and cycling.	SA supports new development in sustainable locations
Suffolk County Council	**Objecting to Objective 2 (Settlement Policy)** In conjunction with the settlement policy, Suffolk Coastal needs to consider how they will deal with S106 provision particularly with small scale development across the district being likely to form the vast majority of new development. The cumulative impact of small scale development over time places similar pressure on existing infrastructure but is currently not adequately captured. It is therefore suggested that s106 thresholds could be reduced as low as single dwelling developments. SCC strongly suggests that Suffolk Coastal consider introducing a tariff approach on smaller scale new development to cover a range of services such as affordable housing, open space, education, libraries etc.	S106 could help mitigate the negative effects of development.
Suffolk Preservation Society	**Supporting Objective 2 (Settlement Policy)** Subject to the use of the original definition of sustainability	Agreed.
Mr Edward Greenwell	I wish to comment on your paper "Sustainability Criteria for site specific Assessments" The excesive dependance on Designations raises problems. 1. You have to rely on a line on a map which can never respect the subtle variations of landscape/ ecosystem etc that are actually on the ground. 2. A second issue is the lack of respect for the hierarchy of designations. e.g. you refer to your intention to consider the impact of proposals with 500 m. of ALL designations. If 500 m is right for a national or international designation, it is excessive for a local one. Local designations are created with relatively little rigour, and often no consultation process. It is important to set up your sustainability criterion for this in a way that respects the designation hierarchy, as is recommended in PPS7. You use a term "core biodiversity area". This is undefined, and does not, as far as I know, relate to any recognised designation. it it far too vague a term to use in such an important context. You intend to look at a 1 Km radius area round any BAP species or habitat. This is an enormous area (314 Ha), around locations that are not uncommon (e.g. crested newts are realatively widespread in Suffolk). I suggest that this needs to be toned down/reduced in area.	These are issues to be considered when undertaking SA for the Site Specific DPD.
Great Glemham Parish Council	**Objecting to Objective 3 (Countryside)** As phrased, this objective fails to recognise the predominance of man-made features (farm-land, fields, hedges, woods, pastures, ponds, etc.) that need management to maintain and enhance the landscape character. National government policy is, in fact, in a state of flux and major changes (CAP-driven) are anticipated in 2012-3. The strategy should be sufficiently flexible to adapt to future economic impacts on farming and rural communities.	Considered in SA objective 19 To conserve and enhance the quality and natural distinctiveness of landscapes and townscapes.

Consultee	Comments	SA Response
Levington & Stratton Hall Parish Council	**Objecting to Objective 3 (Countryside)** As mentioned earlier, emphasis must be on the protection of the countryside, not economic prosperity, especially in/or adjoining designated areas such as AONB. It is extremely disappointing that in this particular section 'The Countryside', rightful emphasis is not placed upon it.	SA takes account of the need for environmental protection and economic viability. See SA objectives for the environment plus 20 and 23 in Appendix 2. .
Notcutts Limited	**Supporting Objective 3 (Countryside)** We support this objective. It is imperative to secure the long term prosperity for the Rural Areas. To assist this we believe there should be a presumption in favour of the redevelopment of existing vernacular buildings in the Countryside for residential use and existing modern farm buildings for commercial use - in both cases good design and landscaping is essential.	Reuse of buildings is supported in SA.
Highways Agency	**Objecting to Objective 4 (New Housing)** Encourages the Council to adopt a strategy that seeks to locate new development in sustainable locations where day to day facilities were readily accessible by public transport, walking and cycling.	Reflected in SA objectives see Appendix 2.
RSPB	**Supporting Objective 4 (New Housing)** The RSPB recognises the requirements for new housing as outlined in the RSS and supports Draft Objective 4 in ensuring these new houses proceed in accordance with sustainability principles. We would recommend that the Core Strategy include specific targets for achieving the following (or similar) principles for sustainable design: • A commitment to reducing carbon emissions by ensuring all new developments are expected to incorporate renewable energy technologies. • A commitment to ensuring that all new development must achieve at least BREEAM EcoHomes 'very good' or 'excellent' standard and the equivalent for commercial properties. • A commitment to reducing water consumption and wastage by ensuring all large developments must submit a Water Conservation Strategy, detailing how water will be conserved, and the water environment protected from adverse impacts. • Encouraging all new development to manage excess rainwater via retention in SUDS. The RSPB encourages SUDS to be managed as functioning ecosystems, for example as wetland, ditch and pond features. These can support biodiversity as well as providing water storage and reducing flood risk. • Encouraging the use of sustainable building materials and re-use of materials, such as recycled aggregates and wood, wherever possible. • Encouraging incorporation of vegetation into built structures and provision of high-quality public space, by creating or restoring wildlife habitats, in new developments. The RSPB would like to see a presumption against new housing development on greenfield sites.	All included in SA objectives see Appendix 2.

Consultee	Comments	SA Response
Suffolk County Council	**Objecting to Objective 5 (Meeting Housing Demand)** Affordable housing is often the largest S106 demand on new development. It is therefore suggested that there is a need for further detailed clarification on this in light of financial impact on new development, which in turn affects viability of other S106 demands. The definition of affordable housing needs to include Supported Housing, such as Very Sheltered Housing etc, to deal with significant service pressures arising from very challenging demographic changes.	SA considers the housing needs of all social groups but particular note needs to be made of the need for very sheltered housing given the age profile of the District. .
Suffolk Preservation Society	**Supporting Objective 6 (Economic Development)** Supports but questions the phrase "and to attract workers to remain in employment in the district"	SA supports reducing the need to travel to employment.
Highways Agency	**Objecting to Objective 10 (Transport)** Interest in the district relates to the A14 (which incorporates the A12 west of the Seven Hills interchange). Modelling indicates that, with the levels of growth proposed in the RSS, this road may experience severe congestion by 2021 unless traffic is managed. Therefore encourage the promotion of travel behaviour change initiatives to encourage more sustainable patterns of local travel. Such measures may include travel plans and reviews of local parking and charging regimes. Transport cuts across all themes in the document. It should be the subject of a chapter in its own right. This should address such issues as: • Including a policy stating the thresholds above which developments will require a Transport Assessment • The requirements for individual site and area-wide travel plans • An accessibility policy, covering good access and convenient connections to employment, education, retail, leisure, and healthcare. Developers should provide adequate cycle and footway connections into existing networks and plug external gaps • A policy that recognises the PPG13 standard that all new development should be located within 400 metres of a bus stop. • Incentives to increase rail patronage, including freight rail traffic predicted as a result of the Port expansion • Car parking standards to be in accord with PPG13	SA supports reducing the need to travel for any purpose and provision of sustainable options for travel that has to be made. The SA will expect all the actions suggested to be included in Core Strategy policies.
Save Trimley Against Growth	**Objecting to Objective 10 (Transport)** This section completely ignores the adverse effects on the A14 that will arise from: a. extra Port throughput and b. extra private vehicles arising from large scale development	The SA will be looking to see if policies support the encouragement of freight being moved by rail, transport assessment of large scale development and promotion of sustainable modes of transport.

Consultee	Comments	SA Response
Snape Parish Council	**Objecting to Objective 10 (Transport)** Neither the A12 nor the A14 are adequate for their purposes. While there are obvious cost issues, expansion of Felixstowe docks is rapidly making the A14 vastly overcrowded, with huge disruption, and problems with diversions if there is an accident. The A12 is little better. These issues will not go away, but there is a head in the sand approach at the moment.	The SA will be looking to see if policies support the encouragement of freight being moved by rail and promotion of sustainable modes of transport.
Suffolk County Council	**Objecting to Objective 10 (Transport)** All new properties, both residential and industrial, should be assessed for a contribution to meet the aims of the Local Transport Plan in providing improvements to sustainable travel. SCC would also like Suffolk Coastal to continue to require travel plans for all major non-residential development.	SA Objective 14 considers the effects of traffic on the environment seeking a reduction in the need to travel and use of sustainable modes.
Suffolk Coast & Heaths Unit	**Objecting to various parts of Section 2.8 (Environment)** • In Section 2.8 headline facts, It is unclear as to whether the defences refer to artificial/hard defences or include more natural features such as shingle banks. • Draft Objective 11 may be read that it is only the distinctive environments that are going to be conserved and enhanced. It may have more effect if the wording is changed to retain the quality of the environment and where possible enhance it, especially improving its local distinctiveness. The use of the word 'by' at the end of the first paragraph in draft objective 11 is limiting. There is no reference to furthering biodiversity or restoring landscape character and condition or improving awareness and understanding. In a coastal community should there also be reference to the marine environment. Even if the current powers do not extend past mean high water mark, the land based activities impinge on the marine environment. • Reference is made in the biodiversity section to the Government signing up to the Biodiversity Convention. In November 2006 the UK Government signed up to the European Landscape convention with its concomitant requirement to bring in integrated landscape policy and perhaps should be included here. • At para 2.8.18, the paragraphs on biodiversity appear to jump at this point to a whole range of other environmental issues. This both weakens this list as the context is strange, and weakens the reference to biodiversity as the detail is not picked up sufficiently. • Alternative wording for the draft objective 13 could be: ○ To use landscape character assessment and historic landscape characterisation to understand the distinctive nature of the district's landscape and from that base identify opportunities to improve the quality and condition through development opportunities and other strategies. Particular attention to be paid to the AONB/ designated landscapes to ensure development proposals adequately reflect the special qualities and enhance the condition of the landscape.	SA will consider impact on both. SA objective 17 and 19 consider the impact on non statutory sites designated for conservation interest and the broader landscape. Importance of the marine environment noted for the SA issues. Other environmental issues are covered. SA Objective 19 looks at landscape impacts and the importance of the Suffolk Coasts and Heaths AONB is noted in the SA issues.

Consultee	Comments	SA Response
Suffolk Coast & Heaths Unit	• In para 2.8.24, Whilst the idea of raising flood and coastal erosion separately is supported, they are not unique in the impact on human health and safety as pollution and climate change can have similar impacts • An alternative wording for draft objective 14 could be: ○ "To develop a strategy to flood risk and coastal erosion for spatial planning that recognises the risk will always be present and changing due to the nature of climate change. The principles will be to protect human life and the function of the coast and through a medium to long-term vision retain the special qualities of the Suffolk coast and its contribution to the community, environment and economy". • It will be important to provide some leadership for the future direction of the necessary works on the coast. This should be based on the principles of sustainable development and seek to meet the complex needs for those that live, work and visit the coast. The local authority can provide an essential decision process whereby the differing needs are assessed and choices made for the good of the communities they represent in an integrated way.	Both are considered in SA objective 16. SA objectives 16 and 19 and 20 in particular cover these issues. The SA seeks to evaluate whether the plan will maximise sustainability in the District.
Forestry Commission	**Objecting to Objective 11 (Protecting and Enhancing the Environment)** The objective as drafted does not provide sufficient protection to key assets. The Forestry Commission would wish to see a clear statement that there is a general presumption against the conversion of any semi-natural habitat to another land use. Secondly in relation to woodland, there should be a general presumption against the conversion of any woodland to other land uses, unless that is to restore an important semi-natural habitat. In such cases it should be ensured that equivalent areas of new woodland are planted in compensation. Specifically in relation to trees and woodland the policy background is as follows: • Government policy, as set out in the 1994 Sustainable Forestry document, is to operate a general presumption against the conversion of woodland and trees to other use and to protect or ancient and semi-natural woodlands. • This has been reinforced by the recent publishing of the Government's Policy for England's Ancient and Native woodland . • In 1998, the Government published its England Forestry Strategy "A new focus for England's woodland". This sets out the strategic priorities and programmes for trees and woodland in England over the next 10 to 20 years. The role of planning and development is specifically highlighted. • The recently published PPS9 contains specific references to ancient woodland: • PPS9 also states that "aged and veteran" trees are important for biodiversity and "their loss should be avoided".	Most semi-natural habitat is already designated as County Wildlife sites. The need to avoid the conversion of woodland will be added to the SA because loss of woodland including ancient woodland also relates to climate change issues. Most Ancient woodland has already been designated as County Wildlife sites.

Consultee	Comments	SA Response
Suffolk County Council	**Objecting to Objective 11 (Protecting and Enhancing the Environment)** Conservation of the Historic Landscape should form part of this objective. It is a separate issue from specific sites such as listed buildings and Scheduled Ancient Monuments and is appropriate to the LDF.	Considered in SA objectives 18 and 19.
	Development that encourages on-site recycling opportunities should be part of the LDF. It is unclear whether provision of recycling facilities is included in the objective. Local Authorities should include a policy in their LDF that require the provision and maintenance of waste storage/recycling facilities and areas on an individual and community scale to encourage recycling of household waste and its efficient collection.	Included in SA Objective 13.
	Draft objective 12 Suffolk County Council supports this objective. East of England Plan Policy ENV3 requires the strongest level of protection for internationally and nationally designated sites, but also that the wider biodiversity earth heritage and natural resources are protected and enriched.	Covered by Objectives 9, 10,11 and 17.
Highways Agency	**Objecting to Objective 11 (Protecting and Enhancing the Environment)** Expand to refer to the contribution that reducing the need to travel, particularly by car, can have on the environment and the associated reduction in greenhouse gas emissions.	SA objective 14
Home Builders Federation	**Objecting to Objective 11 (Protecting and Enhancing the Environment)** The HBF is extremely concerned that regions and local authorities are seeking to amend and shorten the agreed zero-carbon timeframe of zero carbon homes by 2016. Fundamentally the Industry has signed up to a deal with the Government to achieve Carbon Neutrality within the next ten years. Local authorities should therefore also sign up to this objective in order for consistency and certainty with regard to long-term investment in new technologies and skills that will be essential in order to deliver Carbon Neutrality in the 10 year time-span envisaged. Furthermore, Carbon Neutrality is best achieved through Building Regulations and not via unsubstantiated planning policies. In this regard the Code for Sustainable Homes will have overtaken many planning policies (especially when its accompanying Technical Manual has been published). The debate over the benefits (and pitfalls) of on site, local, regional or national energy generation is still ongoing, as are the issues surrounding the long-term costs/benefits of individual renewable energy technologies. We believe the key in this field is a national strategic vision of how we can achieve an efficient low carbon energy supply for the country. Local authorities should not seek to second-guess such thinking through adopting prescriptive local policies on energy supply. We also consider that the expert capacity to determine such matters is, in any case, not something that currently exists, especially within LPA planning departments. ,	SA objective 15 simply seeks to reduce energy use and promote use of renewable energy. Information on the adoption of BREEAM standards is not currently available.

17

Consultee	Comments	SA Response
Home Builders Federation continued	It is, therefore, considered that planning policy should be concerned solely with removing barriers to the siting or development of new innovations such as wind turbines, CHP plants and other energy generation development. It should not seek to control the use of power within dwellings (since this would, in any event, be unenforceable) or be concerned with the fabric of the building, which is covered adequately by the Code for Sustainable Homes as discussed above. In such a fast moving field of technological innovation planners and the planning system should be open to discussion about the most appropriate issues and solutions on a site by site basis rendering any blanket proportional target unnecessary and, indeed, potentially restrictive on emerging new solutions.	See above
Natural England	**Objecting to Objective 12 (Biodiversity)** This section contains comprehensive coverage of biodiversity issues and we are pleased to see that non-statutory sites, ecological networks and local BAP habitats and species have been included, all of which are elements recommended by PPS9: Biodiversity and Geological Conservation. However, to be fully compliant with PPS9 it is essential that this section also incorporates geological conservation. In this regard, we offer the following recommendations: • Change the section title to 'Biodiversity and Geodiversity' • Change Draft Objective 12 to read, 'To maximise opportunities to enhance biodiversity and geodiversity…' • Include Regionally Important Geological Sites (RIGS) in Table 5 • Change 2.8.17 to read, 'The council is duty bound to afford protection to areas designated for their wildlife and geological interest…' (With regard to SSSIs, the duty of section 28G bodies under the Wildlife and Countryside Act applies equally to biological and geological interest features)	SA objective 17 has been updated to include Geodiversity. Added to issues. SA objective 17 has been updated to include Geodiversity.
Suffolk Preservation Society	**Objective 13 (Landscape)** Supports but recommends the inclusion of the words "sympathetically manage" after "protect"	Covered by SA objective19.
Natural England	**Objecting to Objective 14 (Flood Risk/Coastal Erosion)** Support the separate coverage of flood risk and coastal erosion within the Core Strategy and acknowledge that their implications in terms of planning are different to those of other environmental issues. Offer the following comments: • Within Draft Objective 14, recommend replacing the word 'feasible' with 'feasible and sustainable'. • The Flood Risk section should make reference to the Shoreline Management Plan (SMP)	Both are considered in SA objective 16.

Consultee	Comments	SA Response
Suffolk County Council	**Objecting to Objective 15 (Physical and Community Infrastructure)** In terms of provision for transport and highways, all sites are, at present, considered individually and it is difficult to allow for the cumulative effect of several developments in an area. Area guidelines in Local Transport Plan (LTP) and Local Transport Action Plan (LTAP) leading to a supplementary planning document will be required to maximise the benefit for transport mitigation and improvements. All development should be assessed for a contribution towards the cost of meeting the aims and programmes contained in the Local Transport Plan and Local Transport Action Plan where applicable (this could be calculated on an LTAP area or District area). SCC is concerned that the Core Strategy seems extremely weak on its provision for S106 planning obligations regarding infrastructure needs and contributions associated with new development across the District. It is critical that SCDC fully incorporate s106 planning obligations into the Core Strategy to maximise opportunities to secure external funding of service and infrastructure needs arising from new development. Otherwise the public sector is left with legacy issues in seeking ways to deliver service and/or infrastructure shortfall or under-capacity. Circular 05/2005: Planning Obligations aims to make the system of planning obligations faster, more transparent and accountable and to give greater clarity and certainty to all concerned. It is therefore strongly suggested that Suffolk Coastal should produce a Supplementary Planning Document (SPD) on planning obligations setting out in detail the approach to s106 planning obligations. In particular developers would have a clear idea of the range of services and quantum of contribution up front before acquiring a development site and could reflect this in the price paid for the site. A SPD would also seek to set out priorities. For the larger development sites across the district (included in the Specific Site Allocations) a more definitive list of s106 planning obligations could be made to introduce more certainty. Monitoring could include statistically information on level of s106 planning obligations negotiated, secured & spent. This is a useful benchmark to compare with other local authorities to help gauge performance in this important area of external funding.	Strategic implications of the policies on transport are considered in SA objective 14 and S106 agreements would be seen as a way of mitigating local impacts. This would be consistent with trying to maximise the sustainability of new development.

Consultee	Comments	SA Response
Suffolk County Council	**Objecting to Objective 17 (Leisure)** Suffolk County Council is disappointed to see no mention of the Rights of Way network in the document. The LDF should be used to: • enhance and promote the public rights of way network to encourage healthier and more sustainable lifestyles; • make better use of the planning and s.106 processes to improve sustainable access to services including the countryside; and • work with the County Council to achieve the objectives of Suffolk's Rights of Way Improvement Plan 2006. The recommended Rights of Way policies for the Suffolk Coastal Core Strategy are: Spatial policy: • Improvements to the rights of way network will be sought throughout the District in order to help achieve the objectives within Suffolk's Rights of Way Improvement Plan and sustainable transport objectives in the Local Transport Plan. • Development control policies: • Development which would adversely affect the character and/or result in loss or unacceptable disruption of existing or proposed public rights of way will not be permitted unless alternative provision or diversions can be arranged which are equally attractive, safe and convenient for public use. • Improvements to the rights of way network will be sought through development in order to help achieve the objectives within Suffolk's Rights of Way Improvement Plan and meet sustainable transport objectives.	The role of public rights of way are recognised in SA objective 1 concerning health. This puts a marker down on the importance or maintaining public rights of way as part of the highway network particularly related to encouraging sustainable modes of transport.

2.4. Difficulties encountered

The Sustainability Appraisal has been undertaken while preparation of preferred policies has been on going. This sometimes made it difficult to be clear what the main policy was and what the appropriate next most sustainable/realistic options were. Papers on the reaction to the June 2007 consultation exercise were passed to the Research and Monitoring Group whilst the sustainability appraisal was on-going. This required re-checking of issues raised although the amount of change was limited. When a draft version of all the preferred options became available it was agreed that these preferred policies in their pre consultation form would be appraised, plus alternatives that had been included in the Issues and Options paper. This enabled an overall assessment of the sustainability of the "basket" of policies being proposed which is very important at this stage of development of the plan. There will be an opportunity for change or fine tuning wording of the preferred options taking into account the SA, when comments resulting from the consultation period are reviewed.

As a draft version of the preferred policies document was used there were some gaps in the information. For example under Objective 6 reference is made to a Table 4 that listed the General Employment Areas. This was not provided so the appraisal was undertaken on a strategic level considering the concept of having General Employment Areas meaning that the relative sustainability of the proposed General Employment Areas will need to be considered in the Site Specific Allocations and Policies DPD.

The Draft Preferred Policies paper identified new policies that did not have options in the Issues and options paper (e.g. Flood risk, nuclear power, connectivity). The issues involved were discussed at the Issues and Options stage, but no clear alternative approaches identified. For some there are no realistic options as government policy now requires a particular approach, which is new (so continuation of existing trends would be unrealistic). For example CS18 sets out SCDC policy on renewable energy. Planning Policy Statement 22 advocates the encouragement of schemes that utilise renewable energy resources.

Also it was necessary to update the baseline data and issues as information in the 2006 scoping report had become out of date. This changed the baseline position on several criteria.

3. BACKGROUND

3.1. Purpose of SA and SA Report

The intention of the Planning and Compulsory Purchase Act 2004 (P&CPA) is to pave the way to a more flexible and responsive planning system (Planning Portal 2006). Local Plans are being replaced with the Local Development Framework (LDF), which has the objective of contributing to the achievement of sustainable development. As part of the process of preparing planning policies and site specific proposals for the area, the local planning authority must "carry out an appraisal of the sustainability of the proposals in each document and prepare a report of the findings of the appraisal" (P&CPA 2004)

In addition European Directive 2001/42/EC was transposed into UK law in July 2004 requiring Strategic Environmental Assessments (SEA) on the effects of certain plans and programmes on the environment. Current government guidance requires that SA and SEA occur as a unified assessment as the processes of SA and SEA are very similar (DCLG). Since October 2005 there has also been a ruling that 'Appropriate Assessment' is undertaken on LDFs.

Suffolk County Council was asked by Suffolk Coastal District Council to carry out this Sustainability Appraisal on its behalf. This document sets out the process and results.

3.2. Plan objectives and outline of contents

The Core Strategy Issues and Options paper published in February 2007 listed seventeen objectives, broken into six themes. In the draft Preferred Options paper received by Suffolk County Council in November 2007, the number of objectives had been reduced to 15 and themes increased to six. All but one objective contained between one and four Strategic Policies.

The objectives assessed in this document are those put forward in the November 2007 document. In order for the assessment to give a clearer picture of the sustainability of the proposals, alternatives options devised using previous iterations of the document are tested and compared to the current objectives.

The following sets out, under each theme the wording of the plan objectives, preferred policies and the alternatives that have been appraised in this document. Some preferred policies do not have options because the area of concern was discussed in the Issues and Options paper but no options set out. For these the "no plan" option has been assessed which considers what would happen if existing policy (where it exists) and current trends continued.

Theme 1 – Achieving a better quality of life
To ensure that development supports the principles of sustainable development and secures sustainable communities.

Objective 1: Sustainable Development and Sustainable Communities:
To deliver more integrated and sustainable patterns of land use, movement, activity and development.

Policy CS1 – Sustainable Development
Central to the Core Strategy for the future of the Suffolk Coastal district is the achievement of sustainable development. Of particular relevance to the district are:
   (a) The application of a defined settlement hierarchy itself based on sustainability principles;

(b) Provision of sufficient housing to meet the needs of current and future populations, in a way which is both sustainable, appropriate to the widely varying communities which make up the District, and avoids or minimises the negative impacts which can arise from development;

(c) Enabling a healthy economy, notably in the town centres and rural areas;

(d) Transport accessibility to services and an integrated and sustainable transport system;

(e) The conservation and enhancement of the natural and built environment;

(f) The effects of climate change;

(g) Maintaining and enhancing a sense of place;

(h) The provision of appropriate infrastructure in order to support existing and proposed communities; and

(i) The achievement of quality local services accessible to all sections of the community

The above is the same as what was included in the Issues and Options paper plus the addition of (f), (h) and (i). This could have been assessed as an option but clearly it would have demonstrated it was less sustainable. The alternative considered in the Issues and Options paper was the regional spatial strategy (RSS) policy SS1: Achieving Sustainable Development. The strategy seeks to bring about sustainable development by applying:

1) the guiding principles of the UK Sustainable Development Strategy 2005:
   - Living within environmental limits
   - Ensuring a strong, healthy and just society
   - Achieving a sustainable economy
   - Promoting good governance
   - Using sound science responsibility

2) the elements contributing to the creation of sustainable communities in Sustainable Communities for All which are:
   - active, inclusive and safe (in terms of community identity and cohesion, social inclusion and leisure opportunities);
   - well run (in terms of effective participation, representation and leadership)
   - environmentally sensitive;
   - well designed and built;
   - well connected (in terms of good transport services)
   - thriving (in terms of a flourishing and diverse economy);
   - well served (in terms of public, private, community and voluntary services); and
   - fair for everyone.
   - Local development documents and other statutory and non statutory strategies relevant to spatial planning within the region should:
   - assist the achievement of obligations on carbon emissions; and
   - Adopt a precautionary approach to climate change by avoiding or minimising potential contributions to adverse changes and incorporating measures which adapt as far as possible to unavoidable change.

In particular, the spatial strategy seeks to ensure that development:
   - Maximises the potential for people to form more sustainable relationships between their homes, workplaces and other concentrations of regularly used services and facilities, and their means of travel between them;
   - Respects environmental limits by seeking net environmental gains wherever possible, or at least avoiding harm, or (where harm is justified within an integrated approach to the guiding principles set out above) minimising, mitigating and/ or compensating for that harm.

This has been assessed as it provides a useful comparison, challenging the SCDC version to reflect local issues in a robust sustainability context.

Objective 2: Settlement Policy: To ensure that the number and distribution of new houses and jobs are balanced and reflect sustainable principles, including making greater use of previously developed land, whilst respecting the character of settlements and local surroundings. In doing so to sustain viable rural communities where access to day-to-day facilities is not restricted to the use of the private car.

Policy CS2 – Settlement Policy
The following settlement hierarchy would be used in determining the scale of development appropriate to a particular location:
- Major Centres - defined as settlements capable of development for strategic purposes.
- Market Towns - settlements capable of expansion, including estate scale development, where such development would support the role of the settlement, contribute to regeneration and not be detrimental to their character and setting
- Key Service Centres – settlements which provide the full range of specified facilities and are capable of sustaining some minor expansion, groups of houses and infilling consistent with their character and setting
- Local Service Centres – settlements providing a smaller range of facilities than the key service centres. Development within these settlements would be confined to, dependent on their individual character, infilling or small groups which address specific local economic, social or community objectives. Also includes settlements that contain a smaller range of facilities but link with neighbouring settlements (as a "cluster"), so as to between them provide for a greater range of facilities and services that go a long way to meeting all day to day needs of the wider locality.
- Other Villages - settlements with few or minimal facilities where the presumption is against new development unless it can be justified as a rural exception.
- Countryside - the area outside the settlements above including the hamlets and small groups of dwellings that are dispersed across the district. These are considered to form part of the countryside.

As there were no other options, the settlement policy hierarchy was compared with four alternatives:
- A hierarchy based on physical size rather than sustainability criteria, i.e. major centres, market towns, large villages, small villages and countryside (as in the current local plan).
- A simpler hierarchy whereby all settlements below the level of local service centre are treated the same (i.e. other villages and countryside are treated the same)
- Include an additional level between market town and key service centre, recognising that some villages have a very wide range of facilities and services. Examples might include Wickham Market, Trimley St Martin and Trimley St Mary.
- Wickham Market to be designated as a market town.

Objective 3 - Countryside: To provide a framework which will maintain and enhance the quality of the built and natural environment, whilst securing the long-term prosperity of those living and working within the rural area, including the Area of Outstanding Natural Beauty.

Policy CS3 – Development in the countryside
In Suffolk Coastal the countryside outside of town and villages, including hamlets and other small communities, will continue to be protected for its own sake from development that is inappropriate in terms of its type or scale, or does not require a rural location. The emphasis will be on:

- Meeting the needs of agriculture and horticulture
- Promoting protection and enhancement of the environment including biodiversity
- Encouraging an accessible countryside
- Supporting the rural economy
- Meeting local social needs

The updated Core Strategy did not give alternative policies for objective 3. However, based on previous documents we were able to deduce one other possibility:

To continue with the existing local plan policy of restraint, i.e. restrict development except in a few specified exceptions. Development expected to encompass agriculture/ horticulture, forestry, employment, housing to meet local needs (including extensions and replacements), gypsy/traveller sites (subject to the Accommodation Assessment Survey), community facilities, leisure/tourism, transportation projects, public utility projects, renewable energy projects, coastal defence, mineral extraction (subject to conformity to Minerals LDF) and waste disposal (subject to conformity with Waste LDF)

Theme 2 – Housing
To encourage the improved provision of, and access to, appropriate housing to meet existing and future needs.

Objective 4 New Housing: To meet as a minimum, the district's housing requirements as identified in the Regional Spatial Strategy (RSS) for the period 2001-2021. This includes providing housing that will encourage younger people to remain in the district, but also addresses the needs of what is currently an ageing population.

Such provision to be made in a manner which addresses both the immediate needs of the local resident population and the longer-term future needs of the population, in accordance with the principles of sustainable development and sustainable communities.

Policy CS4 – Meeting Housing Requirements
The Core Strategy will make provision for a minimum of 7,880 new dwellings in the district in the period 2007 to 2024. This will consist of at least 2,140 new dwellings in that part of the Ipswich Policy Area within the Suffolk Coastal district and 5,740 new dwellings elsewhere in the district.

The preferred distribution of housing is 29% in the Ipswich Policy Area, 31% in Felixstowe, Walton and the Trimleys, 25% in the market towns, and 16% in other settlements

Based on previous iterations of the core strategy, alternative options for housing distribution are assumed to be:
  i. A 50/50 split between the IPA and Felixstowe/the Trimleys.
  ii. Split only between the IPA, Felixstowe/Trimleys and the market towns.

There were also four options for expansion of Felixstowe:
  i. the north-west between Walton and Trimley St Mary where the issue of noise from the A14 is likely to influence the area available
  ii. the north and north-east where landscape issues are important. The opportunity is available for longer term planning of the town with further development a possibility. Candlet Road in many ways acts as the physical boundary of the town.
  iii. within the parishes of Trimley St Martin and Trimley St Mary themselves. Both have been identified as Key Service Centres with 2001 populations of 1945 and 3672 respectively, including estate scale development. Modest expansion is possible without removing their individual character. Issues of landscape impact will be important

iv. north of the A14 at Trimley St Martin where landscape issues are important as well as the crossing of a major threshold in the form of the A14 itself

Objective 5 Meeting Housing Demand: To increase the stock of housing to provide for the full range of size, type and tenure of dwellings to meet the demands of the existing and future populations by maximising the use of the existing stock through conversion, adaptation or extension and targeting new provision to meet identified shortfalls and longer term needs.

Policy CS5 – Affordable Housing
Appropriate policies will be formulated in order to achieve 1,900 affordable housing units across the district in the period 2007 to 2024 (i.e. 24% of the total new housing). This will consist of:
- 1,500 social units and
- 400 intermediate units

These targets will be monitored and may be modified to take account of up-to-date housing needs surveys.

Based on previous iterations of the core strategy, alternative options for affordable housing are assumed to be:
i.   Continue with the current affordability quote of 33%
ii. Raise the affordability quota to 66% in rural edge-of-village sites

Theme 3 – The Economy
To stimulate a prosperous economy in order to improve the quality of life for the community.

Objective 6 Economic Development: To increase prosperity and employment growth to meet, as a minimum, the identified employment needs of the district as indicated in the RSS, to achieve a more sustainable balance between workers and jobs and to attract workers to remain in employment within the district.

Policy CS6 – Employment Site Hierarchy
The provision of employment land and creation of new jobs will be based on a hierarchy of sites as follows:
- Strategic Employment Sites – sites of more than local economic importance. Two are identified:
  - The Port of Felixstowe is a container port of national importance that has recently been granted permission for a major reconfiguration. It is anticipated that this re-configuration alone will provide directly and indirectly for approximately 1200 new jobs.
  - The Martlesham Heath Business Campus contains Adastral Park, the international research establishment of British Telecom. This is a vital component of the local economy and occupies one end of the Ipswich-Cambridge Science corridor.
- General Employment Areas – it is anticipated that most economic activity of a general nature will take place on these areas, including any extensions to them. They will be shown on the Proposals Map and are listed in Table 4 below. Most existing employment provision at the market towns would fall within this category.
- Local Employment Areas – these consist of more than one business and generally occur throughout the district, whether it is in urban or rural locations. They provide employment and help to retain viable and balanced communities. They are numerous and generally small in scale. Uses will be restricted to B1 only. The suitability of new sites will be determined by the policies of the Core Strategy but will generally be resisted in the countryside.

Based on previous iterations of the core strategy, the options for retaining employment site are assumed to be:

   i. Continue with existing policy, i.e. encourage all sites to remain in employment use unless their loss would not cause or accentuate a significant shortfall in employment land or is there is substantial benefit in alternative uses.

   ii. Continue with the emphasis on retaining employment land in employment use, but provide more positive and explicit guidance on what is acceptable, i.e. a 3-stage sequential approach:

      1. Land is expected to remain in employment use, though not necessarily the same type of employment.

      2. Site is redeveloped as a mixed-use site with at least some employment use.

      3. An alternative mix of uses which offers greater potential benefits to the community in meeting local business and employment needs.

Policy CS7 – New Jobs
The Core Strategy will make provision for at least 8.5 hectares of employment land within the district, creating at least 8000 new jobs in the district in the period 2001 to 2021 as a contribution to the Regional Spatial Strategy requirements. This will include additional land at Nacton as an extension to Ransomes Europark. The strategy of creating new employment land will be complemented by one of protecting that existing.

Objective 7 The Rural Economy: To strengthen and diversify the rural economy through:

- Fostering the maintenance and expansion of existing employment and creation of new employment in the market towns of the district.
- Encouraging small-scale farm and rural diversification enterprises which are compatible with objectives in respect of the environment.
- Supporting agriculture.
- Expanding the tourism offer where it is compatible with the objectives in respect of the environment.

Policy CS8 – Economic Development in the Countryside
The countryside is an important economic asset supporting a variety of uses including agriculture, horticulture, forestry, tourism and a host of other smaller service industries and businesses. The countryside is also a dynamic environment that is to be protected for its own sake.

A key element of the plan will be to look to ensure that opportunities to maximise the economic potential of the rural areas, particularly where this will secure employment locally, are supported. However, support will only be offered where it can be proven that the use will have no adverse impact on the built or natural environments, is compatible and well related to the rural settlements, and accords with Policy xx. In relation to individual proposals, issues such as scale, access to the main road networks, to markets, labour etc. will be important.

Based on previous iterations of the core strategy, alternative options for the rural economy are assumed to be:

   i. Apply a very restrictive policy in order to protect the countryside for its own sake. Farm diversification schemes in non-sustainable locations (e.g. more than a set distance from existing settlements or public transport routes) will not be permitted.

   ii. Continue with existing approach, i.e. limiting development to areas where it is essential for the efficient operation of agriculture, forestry and horticulture, or is otherwise permitted by policies in the local plan.

   iii. Continue existing approach required by government and regional guidance; a more refined approach to identifying acceptable development proposals.

Objective 8 Tourism: To promote all year round tourism based on the attributes (environmental, cultural and people) of the area, which optimises the benefits of employment and value to the economy that is compatible with maintaining the quality of life of the area.

Policy CS9 – Tourism
The district of Suffolk Coastal will consist of distinct areas where proposals for tourism-related development will be determined by their capacity to absorb new development and additional visitors.

The areas are:
- The resort of Felixstowe, which is a priority for new tourist activity
- The market towns of Framlingham, Leiston and Saxmundham. These are considered to have the capacity to absorb some modest development thereby taking pressure off the more sensitive areas
- Aldeburgh and Woodbridge. Two small towns in sensitive locations within and adjacent to the AONB respectively. The protection of their settings will be of prime importance
- The Heritage Coast. The environment is of national significance and the only development to be permitted will be individual conversions to tourist accommodation to a high standard of design
- The Suffolk Coast and Heaths AONB. Development will be restricted to conversions and improvements (not extensions) to existing facilities
- The remaining area east of the A12. Modest developments may be permitted close to settlements that offer a range of facilities.
- The area west of the A12. This area has the potential to absorb additional tourist pressure and subject to the implications for the environment, including the generation of traffic, the Council will support and promote tourism west of the A12

Where necessary the Council will support the introduction of local management solutions to the problems created by tourism.

There are two alternative policies for CS9:
  i. A continuation of the current policies whereby proposals are assessed against their impact on the environment and local communities. There is a general strategy of resisting large-scale development in the AONB, notably the "honeypots" that have developed there. Small-scale activities, notably the provision of accommodation, are encouraged across the district. Such an approach tends to be sweeping in its application and fails to apply sustainability criteria.
  ii. To apply a discerning policy whereby the district is divided into distinct areas where the tourism potential will be managed, encouraged or resisted. The result is a hierarchy of tourism development, linked to the hierarchy of settlements created earlier.

Objective 9: Retail Centres: To sustain and enhance the vitality and viability of town centres; to foster market towns are service, employment and retain centres; and to encourage the retention of appropriate local services including post offices and shops in villages and district centres.

Policy CS10 – Retail floorspace
The Core Strategy will enable the provision of the following new floorspace for the period 2003 to 2016:
- 2,730 m² of convenience goods floorspace
- 9,270 m² of comparison goods floorspace

This will be created within existing centres in order to add to the qualitative provision and strengthen their trading positions.

Policy CS11 – Retail hierarchy

A retail hierarchy has been drawn up to reflect the existing levels of provision and settlement roles as set out in the settlement hierarchy. This also takes on board the likely scales of future development. The hierarchy is defined as follows:

- **Major Centre (Felixstowe)**
  Should incorporate a range of provision including convenience stores, supermarket, comparison goods, and retail warehousing.
- **Market Towns (Aldeburgh, Framlingham, Leiston, Saxmundham, Woodbridge)**
  Should incorporate a range of provision including convenience stores, supermarket, and comparison shopping provision. Emphasis will be on retaining the range of provision to meet the needs of the towns and their hinterlands whilst supporting their role as local tourist centres.
- **Key Service Centres**
  Should include provision of convenience and day-to-day shopping. Emphasis will be on retention of existing provision.
- **Local Service Centres**
  Should include provision of convenience shopping. This could take the form of a local farm shop, or similar facility linked/ancillary to another use. Emphasis will be on retention of existing provision.
- **Other Villages/Countryside**
  Where no provision currently exists (this includes the provision of a farm shop or similar) this situation is unlikely to change. Any proposals for development should be re-directed towards higher order settlements that by their nature are more sustainable.

An alternative for policy CS11 is to allow significant levels of development within the Ipswich Policy Area.

Theme 4 – Accessibility

To protect, improve and use our environment in a way that not only benefits the people who live, work and visit the area, but also leaves a rich and diverse legacy for future generations.

Objective 10: Transport: To minimise the environmental impact of travel, by reducing the need to travel, encouraging the use of more environmentally friendly modes of transport, and widening the choice of modes.

Policy CS12 – Travel

To ensure wherever possible, that new development is located in areas where the need to travel is minimised and, where realistic alternatives to use of transport other than by private motor vehicle are available, to provide incentives to encourage use of these alternative modes.

Standards such as those devised for the number and location of parking spaces to serve proposed developments will have regard to the necessary reliance on the private motor vehicle in some of the rural parts of the district.

All proposals for major development should be accompanied by travel plans.

The Council will encourage public transport operators to provide services in support of the Council's Vision for the district, and in particular the roles of each of the settlements within the settlement hierarchy.

Policy CS13 – Connectivity

The Council will work with neighbouring authorities, the highway authority and transport providers to enable improved connectivity within, into and out of the district. This will centre on improving:
- Bus routes and services between the rural settlements and the market towns;
- Bus and rail routes between the market towns and Ipswich and Lowestoft;
- Accessibility of rail stations and facilities at rail stations for cars and cycles;
- Transport connections to Stansted airport; and
- Transport connections to Felixstowe Port, including the increased use of the rail network for the transfer of freight

Theme 5 – Protecting and enhancing the environment
To protect, improve and use our environment in a way that not only benefits the people who live, work and visit the area, but also leaves a rich and diverse legacy for future generations.

Objective 11: Protecting and enhancing the physical environment: To maintain and enhance the quality of the district's distinctive natural and built environments by:
- The careful use of siting, design and impact of new development and limiting the scale of development to that appropriate to its location;
- Safeguarding, enhancing and managing the culture and heritage of the district

Policy CS14 – Biodiversity
The Council will use the development process to maximise opportunities to enhance biodiversity by protecting and enhancing statutory and non-statutory protected sites, protected species and biodiversity action plan habitats and species, and contributing to regional targets through the restoration and creation of new priority habitats

Biodiversity will be protected and enhanced using a framework based on a network of:
- designated sites (international, national, regional and local)
- wildlife corridors
- the rivers, estuaries and coast
- habitats and species identified in the Suffolk Biodiversity Action Plan

Improved site management and increased public access to these sites will be encouraged where appropriate.

Policy CS15 – Landscape
The policy of the Council will be to identify the various landscape character areas which exist within the district and then to protect and enhance those areas either through opportunities linked to development or through other strategies.

The promotion of local distinctiveness will be encouraged.

Where development in the countryside is justified proposals must include measures to enhance, restore or create special features of the landscape as appropriate.

Based on previous iterations of the core strategy, alternative options for landscape are assumed to be:
  i. Retain the current Special Landscape Area (SLA) designation.
 ii. Expand the SLA designation.
iii. Reduce the SLA designation.

Policy CS16 – Design
The achievement of a high quality of design, including landscaping, is essential in all development. All proposals must:
- Provide an attractive, functional, accessible and safe environment;
- Respect the context, both in respect of the immediate surroundings (scale, height, materials, function etc) but also the local vernacular;
- Include sustainable methods of construction;

Proposals must also be accompanied by a statement setting out ways in which the design and construction will create energy efficiency. Development which is considered to be wasteful of energy or fails to maximise opportunities will not be supported.

Objective 12: Climate change: To both minimise the factors that contribute towards climate change and mitigate against its potential effects by:
- Ensuring development minimises the use of natural resources by utilising recycled materials where appropriate, minimises greenhouse gas emissions, helps to reduce waste and minimises the risk of pollution.
- Encouraging and promoting schemes which create renewable energy where consistent with the need to safeguard residential amenity, the environment and the landscape;
- Minimising the risk of flooding and ensuring appropriate management of land within flood plains
- Improving the process of estuary and coastal management, incorporating an integrating social, recreational, economic, physical and environmental issues and actions

Policy CS17 – Construction
The Council's Core Strategy will be based around the achievement of a distribution of development that minimises the impact on the environment and contributes towards sustainable development. Proposals will be required to:
- Ensure prudent use of natural resources.
- Achieve reduced levels of energy consumption as a result of the actual development and its future occupancy.
- Reduce the emission of greenhouse gases.
- Minimise air, common noise and light pollution.
- Make provision for waste minimisation and recycling.
- Utilise sustainable construction methods

Policy CS18 – Renewable Energy
The environmental and economic benefits of renewable energy production are recognised. Proposals for renewable energy facilities will generally be supported where consistent with other policies of the Core Strategy. However, particular regard will be paid to the impact on the environment, bearing in mind the importance of parts of the district in landscape, heritage and wildlife terms.

Policy CS19 – Nuclear Power
In respect of the possibility of a third nuclear power station at Sizewell, the Council considers the local issues to consist of the following:
a) Proposed layout and design
b) Grid connection / power line changes
c) Landscape/visual character assessment including cumulative effects
d) Coastal erosion/coast protection issues
e) Ecological impacts (on nearby designated sites)
f) Construction management- sustainable procurement policy

g) Transport issues- routing of vehicles during construction- upgrade of roads, use of rail and sea for access
h) Social issues – local community issues during long construction period- housing of workers in the local area
i) Economic impacts upon the area during and after construction
j) Site decommissioning
k) On-site storage of nuclear waste
l) The long term implications for new, permanent housing
m) To ensure that the benefits (including financial contributions) are enjoyed by local communities

Policy CS20 – Environmental Risk
The Council recognises and accepts that flood risk and coastal erosion will continue to impact to varying extents on different parts of the district. As a consequence it will work with other relevant agencies in determining the overall spatial strategy for the plan period to assist the phasing of new development provision accordingly.

In considering proposals for development or the provision of services the Council will seek to ensure that communities and the environment are not adversely affected by the actions of natural and other forces. Proposals must take particular account of the need to
- Ensure protection from, and not worsen the potential for, flooding and
- Restrict new development in areas at risk of coastal erosion

Based on previous iterations of the core strategy, alternative options for the flooding are assumed to be:
  i. Not accept any development in Zone 3a and b as defined by the Environment Agency: (Zone 3a has a greater than 1 in 100 probability of river flooding in any one year or 1 in 200 of coastal flooding, Zone 3b is the functional flood plain)
  ii. Accept development in Zone 3 but follow the sequential approach to development

Theme 6 – Develop and safe and healthy community
The Core Strategy will protect and promote the well being of the community in terms of its health, safety, leisure and cultural opportunities and access to leisure opportunities.

Objective 13: Physical and Community Infrastructure: To ensure that appropriate infrastructure, such as transport, utilities or community facilities are provided in order to address current deficiencies and meet the needs of new development.

In terms of community infrastructure to identify needs and deficiencies in public, voluntary and commercial service provision and seek new approaches to meet those needs and address deficiencies.

Policy CS21 – Infrastructure
The Core Strategy will identify needs and deficiencies in public, voluntary and commercial service provision and seek new approaches to meet those needs and address deficiencies. This will entail the development of a strategy whereby developer contributions (normally through legal agreements) are sought for the services and facilities considered to be the highest priority, and for which alternative sources of funding are the most difficult to find. Such prioritisation will be contained within Supplementary Planning Documentation.

Objective 14: Local Services: To promote better access for every member of the community – particularly younger and older people, those who are disadvantaged, those in remote rural areas, and families – to housing, employment, services and facilities.

In doing so to encourage the retention of appropriate local services including post offices and shops in villages and district centres

Policy CS22 – Local Services
Through the Core Strategy support will be given to proposals which protect or enhance existing services and community assets, or lead to the creation of new, or connection to existing, ones

The Core Strategy will seek to achieve the retention of appropriate local services including post offices and shops in villages and district centres.

Objective 15: Leisure: To ensure that the community is as healthy as possible by providing/promoting opportunities for it to live a healthy lifestyle. In particular, to meet the needs of younger people, including providing them with opportunities to contribute to the development and delivery of services and activities to meet their needs.

Policy CS23 – Sport and Play
Proposals involving the loss of existing playing pitches, sports grounds and other play/sport facilities will be judged against the overall needs of the community or group of communities, adopted standards of provision and the availability of facilities elsewhere.

Proposals for new residential development will be expected to provide or contribute towards sport and play space.

Policy CS24 – Green Space
The Core Strategy will promote well-managed access to, and involvement in, green space in and around communities, including Suffolk Coastal's countryside and coast in order to benefit health, community cohesion and greater understanding of the environment without detriment to wildlife and landscape character

A strategy will be devised that addresses the needs for green space both generally and in specific locations, notably the edges of settlements.

Developer contributions will be used to fund their creation, subject to their priority in comparison with other elements of community infrastructure.

3.3. Compliance with SEA Directive and Regulations
This SA is intended to fully comply with the requirements of the SEA Directive, as set out in "A Practical Guide to the Strategic Environmental Assessment Directive" September 2005. Appendix 1 sets out a quality assurance checklist designed to illustrate how the technical and procedural elements of the SEA process have been handled in this appraisal.

4. SUSTAINABILITY OBJECTIVES, BASELINE AND CONTEXT

4.1. Links to other policies, plans and programmes

Links to other plans policies and programmes were assessed as part of the Scoping Report and are summarised in Appendix 1 of that document. Additional documents that have since been scoped are included in Appendix 3 of this report.

4.2. Description of baseline characteristics

This is an updated version of the description included in the June 2006 Scoping Report.

Demographics

In 2001, Suffolk Coastal's population was 115,400, and is expected to rise by 7.2% to 123,800 by 2021 according to EERA figures. In 2001, 20.9% of the district's population was over 65, the second highest in the county, whilst the proportion of children aged under 16 (18.0%) was the second lowest. By 2021, the number of people over 65 is expected to increase by 14,500, 31% of the overall population (the highest in the county), whilst the number of children under 16 will drop by 3,600 to just 13.9% (the lowest in the county). In the 2001 Census less than 2% of the population were non White. In 2006-7 Suffolk Coastal had the second highest number of National Insurance registrations of migrant workers of the Suffolk Districts 15% of the Suffolk total (780, the highest proportion of which are from A8 countries) plus a higher number of Indian migrant workers linked to BT.

Health

According to figures from 2005, Suffolk Coastal has the second highest mortality rate and death rate from circulatory diseases in Suffolk. The mortality rate from suicide is also above the county average. Conversely, the death rate from cancer is the second lowest, whilst life expectancy (80.7) is the highest in the county.

Education

In 2006 Suffolk Coastal had the third highest level of attainment at GCSE level, with 67.3% of pupils gaining five or more GCSEs at A*-C, above the county average of 62.8%. The district (697 points per pupil) also performs better than the county average (684) at A level. In 2005 the proportion of working age people with no qualifications (15.5%) is slightly lower than the county average (15.8%), whilst the proportion of people educated to at least degree level (29.4%) is the second highest in Suffolk.

Crime and anti-social behaviour

In 2006/7 there were 31.6 crimes per 1,000 people in Suffolk Coastal, the third lowest number in Suffolk and below the county average of 43.87. In addition, the district had the third lowest rates of burglary and violent crime, both of which are below the Suffolk average. The district had the second highest proportion of people who felt there was low levels of crime and disorder, though only the third highest proportion of residents who felt safe in the area where they live according to the 2005 Suffolk Speaks survey.

The district also had the second lowest number of noise complaints in 2004.

Deprivation

According to 2004 figures from IMD, none of the 10% most deprived wards in Suffolk are in Suffolk Coastal, whilst of the 25% most deprived, only 1% live in the district. However, this was higher than any of the other largely rural districts (i.e. excluding Ipswich and Waveney), though a large part of eastern Ipswich is in Suffolk Coastal. The number of people claiming housing benefit was just over 5,000 in 2004/5, the highest level since 2001.

Service provision
At 35.7% in 2005/6, provision of the five key services (a shop, post office, pub, village school and meeting place) to the rural population is below the Suffolk average (40.95%).

Employment
Suffolk Coastal has the joint-lowest claimant count rate in the county alongside Forest Heath (1.0% compared to the Suffolk average of 1.9% in June 2007), and is below the regional and national average. At £33,635 in 2007, average household income is slightly above the county average

Housing
Affordable housing provision in the district is a major problem; in 2005/6 only 9.8% of new homes were classed as affordable, the second lowest level in the county and only just more than half the Suffolk average (18.1%). The average house price was around £198,000, the second highest after Babergh, and 7.8 times the median income, slightly above the Suffolk average of 7.7. A high level of second homes in the district also pushes up house prices and increases demand.

Pollution
River and groundwater data gaps need to be filled. Air quality over the district is generally good, although Woodbridge is currently the only place outside Ipswich to have a declared Air Quality Management Area (AQMA). The district council is preparing an Air Quality Action Plan. The Port of Felixstowe is also required to be assessed in terms of the effects of traffic upon local air quality. On going monitoring of radioactivity occurs at the Sizewell nuclear power site. Gamma-ray spectrometry and analysis of tritium, carbon -14 and sulphur-35 in milk, crops and fruit generally showed very low concentrations of artificial radionuclides near the power stations in 2006. Concentrations of activity in local freshwater were all low. The total dose from all sources including direct radiation was assessed to have been 0.091mSv or less than 10% of the dose limit in 2006 (CEFAS, November 2007)

Development
In 2005/6, 45.4% of new housing was built on previously developed land (PDL), the third highest level in the county after Ipswich and Babergh, though it was below the county average and a slight reduction on previous years where the figure crossed the 50% threshold. At the same time, 48.3% of housing commitments were on PDL, a 10% increase on previous years, but again below the Suffolk average. The density of new housing in 2005/6 was 23.95/hectare, above the county average, but below the national target of 30/hectare.

In terms of employment land, 27.2% of outstanding planning permissions in 2005/6 were on PDL, the lowest level in the county and well below the average of 43.1%. In 2003/4 the figure had been 82.8%.

Waste
Although the proportion of household waste composted in 2006/7 (21.8%) is higher than the county average (18.5%), the district had the lowest recycling rate in Suffolk at just 16.5%. This represents an increase of just 0.1% since 2003/4 in a period where the county average has risen by more than 10%. At 462 kg per person, the amount of household waste collected per person is the second highest in the county, an increase of 16% since 2003/4, by far the largest in the county (for which the average is a 19% decrease).

Transport
According to the 2001 census, the district has the lowest proportion of travel to work by sustainable means (i.e. working at home, walking, cycling, bus or train) at only 29.4%, and

therefore the highest rate of travel to work by unsustainable means (car, taxi or motorcycle). It had the second lowest rate of people walking to work, and the second highest proportion of people using cars and motorcycles. Due to the rural nature of the district and very poor travel methods, mobility is more reliant on the ability to travel easily e.g. to reach services. The lack of public transport infrastructure means that the prevalence of the car therefore remains high.

Traffic volumes in the district are steadily increasing, matching the county average. In 2005/6 almost half of all development (48%) was being directed to major towns in the district, average for the county, but a significant increase on previous years. The number of car parking spaces in town centres rose by 629 (37%) in 2005/6, Suffolk Coastal being the only district to record an increase (though Ipswich and St Edmundsbury did not return figures). The increase was mostly accounted for by long-stay spaces.

Energy
Consumption of gas has decreased although the district remains one of the highest consumers in Suffolk. Domestic energy efficiency has been consistently improving. Uptake of renewable energy is currently problematic. The district has no renewable energy generation and this figure will have to increase with the region being expected to meet a 14% target. Suffolk Coastal is also home to two nuclear reactors, Sizewell A and Sizewell B. Whilst Sizewell A closed at the end of 2006, there is a possibility of a third, Sizewell C, being constructed in the future. Planning permission has been given for wind turbines at Parham (on land) and Greater Gabbard (offshore).

Coast Protection & Flooding
Due to the coastal and estuarine environments, the district is particularly susceptible to flooding. The district has the highest number of properties at risk of flooding in Suffolk. The effects of climate change will put increased pressure on land by adding to the area at risk of flooding and will increase coastal erosion. The Council has commissioned a Strategic Flood Risk Assessment to inform decision making on future development in the district.

Biodiversity
Suffolk Coastal contains 45 Sites of Special Scientific Interest (SSSI), 209 County Wildlife Sites (CWS) and four Local Nature Reserves (LNR). The conditions of the SSSIs and Biodiversity Action Plan habitats and species reveals a mixed picture. In general, most terrestrial habitats are doing well, including some wetland habitats. However, many coastal habitats are suffering from losses as a result of coastal processes and pressures. The creation of buffer zones around sensitive areas could help to limit the environmental impact of development upon these areas.

Archaeology & Heritage
In 2005/6 there were 2,761 listed buildings in Suffolk Coastal. Of those 2,761 buildings, 25 (0.91%) were at risk, the second highest proportion in Suffolk, though a 20% decrease on the previous year. There are 33 Conservation Areas (CA) in the district, the second highest number in the county; in 2004/5 and 2005/6 there were no Article 4 directions (i.e. permissions to develop listed buildings). Suffolk Coastal was the only district to see damage to Scheduled Ancient Monuments (SAMs) between 2001 and 2004, but there was no damage in 2004/5.

In terms of landscape, 36% of the district is designated an Area of Outstanding Natural Beauty (AONB). In addition, the district is doing well in Suffolk for completing Conservation Area Appraisals and Landscape surveys. The availability of data regarding landscape quality, greenspace and the state of the rights of ways network will need to be accelerated to provide an input in to the planning process.

<u>Economic growth</u>
At 7.6% in 2005, the business formation rate in Suffolk Coastal was the second lowest in the county. However, in contrast, the business closure rate (6.9%) was lower than the county average (8.4%), and growth number of businesses since 1997 is above the Suffolk mean.

The district has the second highest proportion of employment in the tertiary sector, with 82.3% of people employed in service industries, well above the county average of 73.4. The largest employment sector is public administration, education and health (28.0%), whilst agriculture and fishing, energy and water (e.g. Sizewell) and other services are also overrepresented. The most notable sector is transport and communications, accounting for 19.5% of employment compared to a Suffolk average of just 8.5%, almost certainly due to the presence of BT and the Port of Felixstowe in the district. The most underrepresented sector is manufacturing, which employs only 5.4% of people in Suffolk Coastal, compared to 13% countywide, though employment in construction, distribution, hotels and restaurants and banking, finance and insurance is also below the Suffolk mean.

<u>Retail</u>
In general there has been a gradual decrease in the percentage of shops in town centres. There is continuous pressure to develop these areas in to other use classes, including housing. There is however a sufficient level (6%) of vacant units in town centres for new business to occupy without having a prevalence of vacant units which can be damaging to the local economy. Viability is therefore crucial and measures to show decline and mix of retail types should be applied.

4.3. The predicted future baseline
It is difficult to come to a view of the predicted future in Suffolk Coastal without the implementation of the plan. The proposed plan includes the continuation of long standing policies as well as introducing new policies. Given the operation of existing policies (those saved from the Suffolk Coastal Local Plan First Alternation 2001) a continuation of trends identified in 5.2 above could be expected to some extent but these policies do not operate in isolation. Plans of other statutory agencies, trends in the economic environment and the impacts of climate change will all act alongside any hypothetical continuation of existing SCDC policies. The issues and problems identified in 5.3 highlight the issues over and above the implementation of existing policy that we expect the new plan to address.

Other new challenges with potential sustainability implications include:
- developments at Sizewell nuclear power station as Sizewell A is decommissioned. Migrant workers linked to such developments may have a very different profile to those associated with the development of Sizewell B
- School organisation review which is looking at the future of middle schools in Suffolk
- Renewable energy developments and local generation schemes

When the sustainability appraisal is undertaken it is based on what you consider will be the impact on the existing situation.

Figure 4.1: Protected areas and sites in Suffolk Coastal

Legend (left map):
- SAC
- SPA
- SSSI

Legend (right map):
- Medium flood risk
- High flood risk
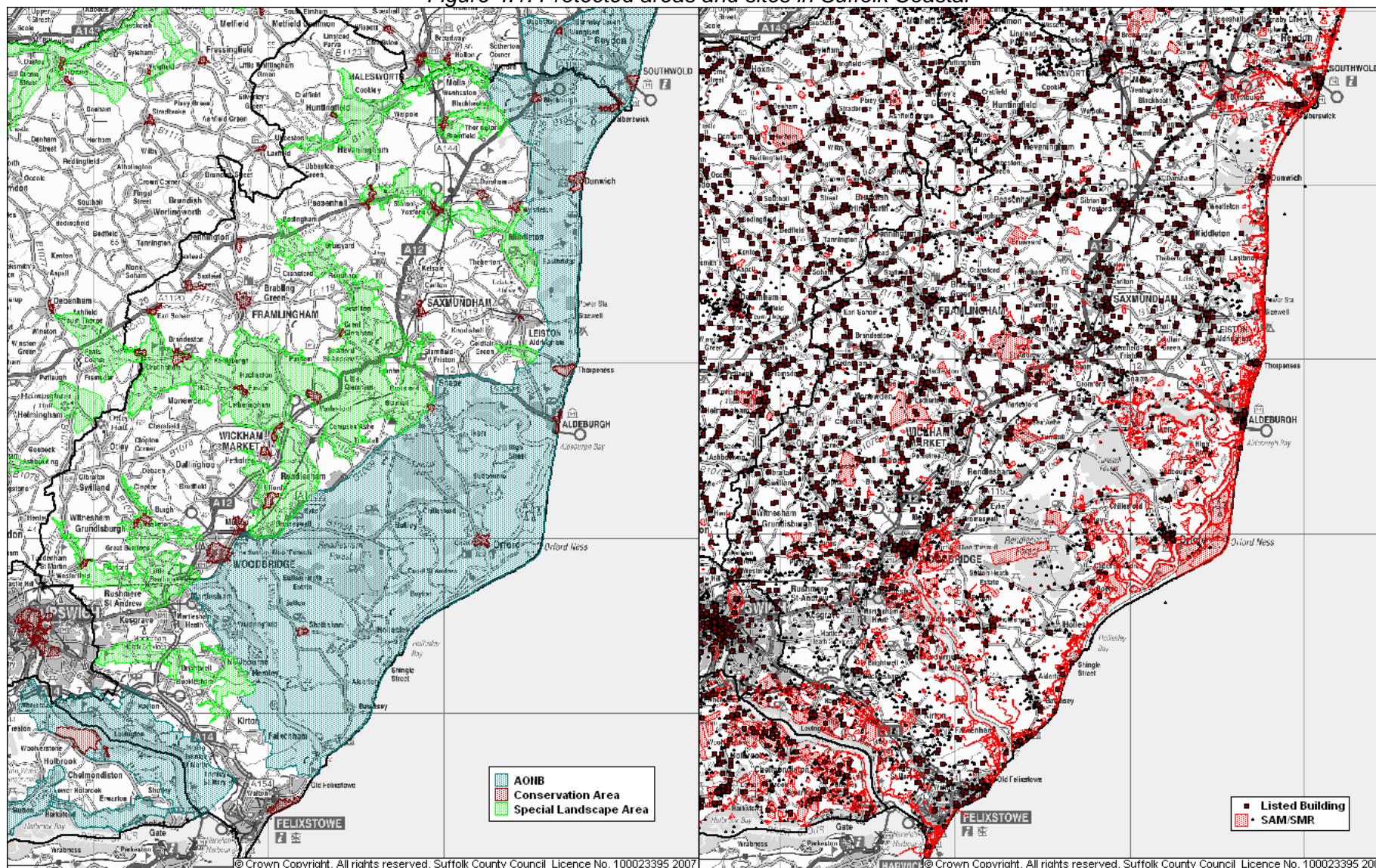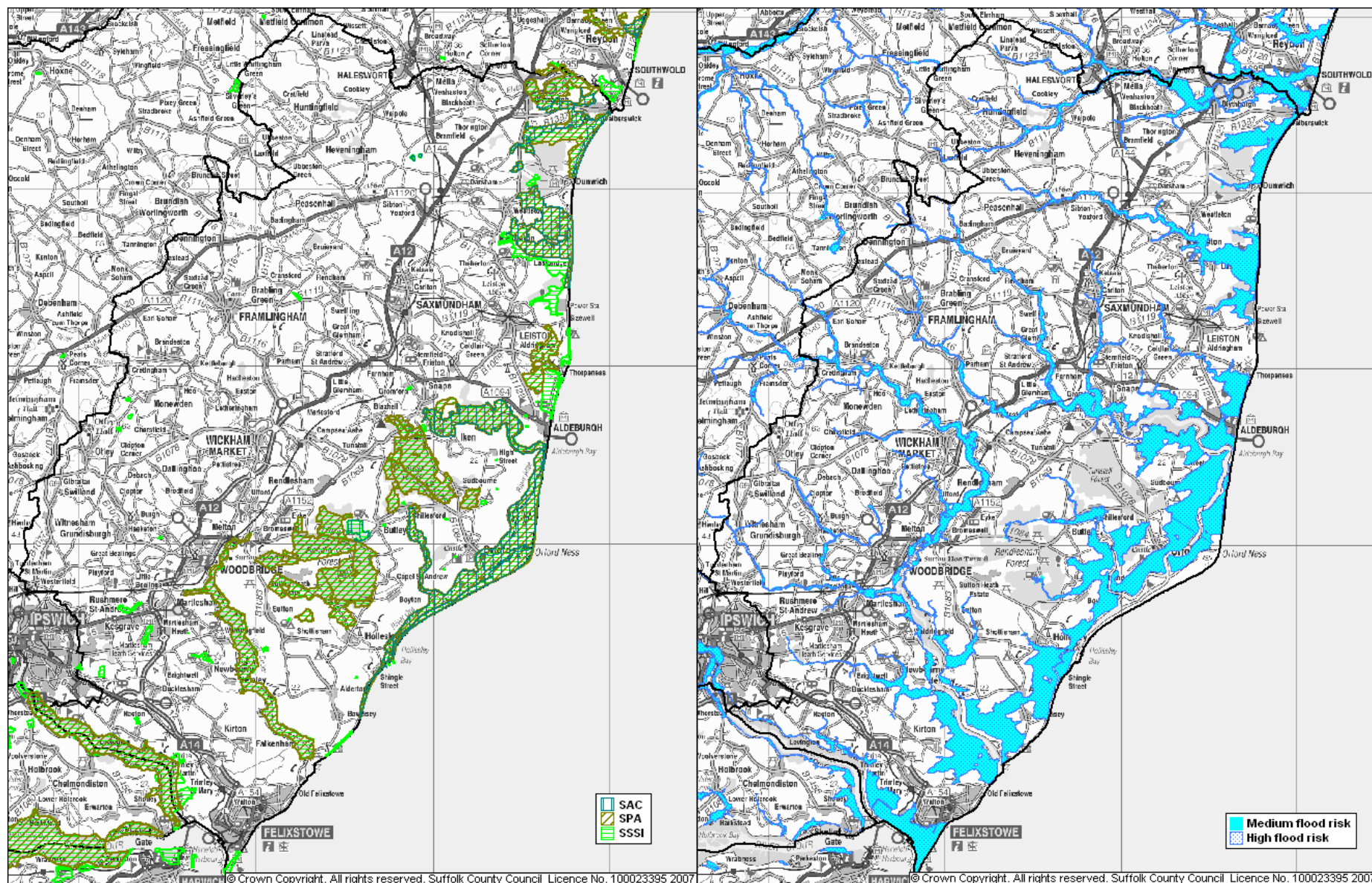
4.4. Main issues and problems identified

The sustainability issues listed in Table 4.1 below have been identified following the update of the baseline characteristics above. Due to significant changes in the data, many of the issues are different to those identified in the scoping report.

Table 4.1: Sustainability issues identified

Social issues	
Health	• Suffolk Coastal has a high mortality rate and death rates from circulatory diseases and suicide.
Travel	• A lack of public transport infrastructure means that the prevalence of car usage remains high.
Social deprivation	• There are some small pockets of seriously deprived areas.
Access to services	• Key service provision in rural areas is below the county average
Housing	• Affordable housing provision in the district is a major problem. Despite new housing stock being created above required build rates, the provision of affordable housing is distinctly lacking. With district house prices continuing to rise sharply and the increase in wages not being able to match this rate, the disparity gap in housing becomes extended. A high level of second homes in the district also pushes up house prices and increases demand.
Demographic	• The district has an ageing population profile and rising although still relatively small numbers of foreign migrant workers.

Environmental issues	
Air quality	• Air quality is a concern in the Woodbridge AQMA.
Development	• Housing density on new developments is below the national requirement. Use of PDL for new housing is below 50%, whilst for employment use it has been falling over recent years and is now well below the county average.
Waste	• Suffolk Coastal has the lowest recycling rate in Suffolk and the amount of household waste collected has been increasing at a much faster rate.
Traffic	• Traffic levels are increasing.
Energy	• Consumption of gas is above the county average and there is currently no renewable energy generation.
Coastal protection and flooding	• The district is particularly susceptible to flooding and has the highest number of properties at risk. Climate change increases the area at risk and coastal erosion.
Conservation	• The proportion of listed buildings at risk is the second highest in the county.

Economic issues	
Business	• Suffolk Coastal has a very low business formation rate.
Retail	• The percentage of shops in town centres has been decreasing.

4.5. Assumptions and limitations on information

For several indicators there is no data or limited data available, whilst for a few others the data we have is not fully up-to-date. Current information on total numbers of foreign migrant is limited. A particular problem concerns indicators that measure climate change. In this appraisal this is covered by objective 13 (Greenhouse gas emissions from energy consumption), which looks at measures of electricity and gas consumption and energy efficiency of homes. Energy consumption by vehicles is not covered because petrol consumption figures are not available. However this should not deter us from commenting on the implications for carbon emission that would occur with actions that result in longer/more car trips.

4.6. The SA framework

The sustainability objectives and key indicators that form the Sustainability framework were subject to consultation in the Scoping report. The 22 original SA objectives were subsequently amended and are listed in Table 4.2. Modifications to the SA framework include amendments made following discussions with the Suffolk Sustainability Appraisal Group (SSAG) in which it was decided that objective 9 (water and air quality) should be split into two separate objectives, objective 15 (To reduce contributions to climate change) needed to be more specific as to the source of the greenhouse gases (energy consumption) and that objective 16 (vulnerability to climatic events) should be more specific (i.e. to flooding). The SSAG representative from Nature England also pointed out that geodiversity should be included alongside biodiversity in objective 16. The SA framework used in this appraisal in included in Appendix 2.

Some indicators were also removed following discussions with SSAG, including the proportion of rural households within 13 minutes of hourly bus service (which is no longer measured) from objective 5 and the number of locally sourced products stocked by major supermarket chains from objective 22 (collecting the data was thought to be too complicated), whilst some news ones were added, such as % of households with broadband internet connection for objective 22.

Table 4.2: SA Objectives

1. To improve the health of the population overall
2. To maintain and improve levels of education and skills in the population overall
3. To reduce crime and anti-social activity
4. To reduce poverty and social exclusion
5. To improve access to key services for all sectors of the population
6. To offer everybody the opportunity for rewarding and satisfying employment
7. To meet the housing requirements of the whole community
8. To improve the quality of where people live and to encourage community participation
9. To maintain and where possible improve air quality
10. To maintain and where possible improve water quality
11. To conserve soil resources and quality
12. To use water and mineral resources efficiently, and re-use and recycle where possible
13. To reduce waste
14. To reduce the effects of traffic on the environment
15. To reduce emissions of greenhouse gasses from energy consumption
16. To reduce vulnerability to flooding
17. To conserve and enhance biodiversity and geodiversity
18. To conserve and where appropriate enhance areas of historical and archaeological importance
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area
21. To revitalise town centres
22. To encourage efficient patterns of movement in support of economic growth
23. To encourage and accommodate both indigenous and inward investment

5. PLAN ISSUES AND OPTIONS

As part of the SA, it is necessary to assess the compatibility of the seventeen core strategy objectives against the 23 SA objectives listed in Table 4.2. The result of this assessment can be seen in Table 5.2. Compatibility is represented by a ✓, meaning that both objectives can operate simultaneously and advantage each other; negative compatibility with an X, uncertain compatibilities with ? and cases with no apparent effect on each other by a 0. Brief reasons for the scores are given.

5.1. Appraisal of the Core Strategy objectives

Of the fifteen core strategy objectives, eleven had more positive than negative compatibilities with SA objectives, signifying that the wording of the objectives have a high level of sustainability ingrained in them. Three plan objectives appear to have more negative compatibilities with SA objectives than positive (new housing, meeting housing demand and economic development) but these can be mitigated through actions that seek to avoid particular types of sites e.g. not building on biodiversity or geodiversity sites, floodplains or requiring zero carbon consumption, waste recycling and use of sustainable modes of transport. The value of the appraisal here is in warning that appropriate policies need to be included to minimise possible negative sustainable effects. One objective (rural economy) had the same number of negative and positives (Table 5.1) signifying that in rural areas it may be difficult to achieve economic sustainability objectives without some cost to soil resources as there is often less brownfield land available in rural than urban areas.

There were 7 cases in which we could not decide upon the compatibilities and gave a ?. The highest level of uncertainty was associated with the countryside objective where the aspirations to maintain and enhance the quality of the built and natural environment could conflict with proposals for development associated with securing the long term prosperity of those living and working in the rural areas, including the AONB. Development could be carefully controlled to ensure it used water and mineral resources efficiently and reused and recycled but by definition it would add to the waste created even if waste were minimised and much recycled. The uncertainty is it could mean that the addition of a new development could trigger a step change in the provision of services (e.g. plastic recycling) so the net effect on the community would be positive.

All the recorded negative and uncertain compatibilities are with the environmental sustainability objectives; hence the need to examine policies to see if, by working in tandem, they will minimise negative sustainability impacts.

Table 5.1: Overall scores of the plan objectives measured against the SA objectives

Core Strategy Objectives	✓	0	X	?
1. Sustainable Development and Sustainable Communities	18	5	0	0
2. Settlement Policy	12	10	1	0
3. Countryside	7	13	0	3
4. New Housing	4	10	8	1
5. Meeting Housing Demand	2	13	8	0
6. Economic Development	4	11	8	0
7. The Rural Economy	5	11	5	2
8. Tourism	6	12	4	1
9. Retail Centres	6	15	2	0
10. Transport	3	20	0	0
11. Protecting and Enhancing the Environment	3	20	0	0
12. Flood Risk/Coastal Erosion	7	16	0	0
13. Physical and Community Infrastructure	4	19	0	0
14. Local Services	6	17	0	0
15. Leisure	3	20	0	0

For 10 out of 15 objectives there were more neutral compatibilities (i.e. no significant interaction) than negative or positive combined, whilst in 8 cases there were no negative compatibilities.

The negative compatibilities were restricted to just nine of the 23 SA objectives. They were largely concerned with possible increases in traffic and the resulting effect on air quality, the use of greenfield land, the possibility of flooding, an increase in waste or energy use and disturbance of the natural or built environment.

5.2. Comments on wording of objectives

Plan Objective 1 Sustainable development and sustainable communities is expressed in broad brush terms. The wording "To deliver *more* integrated…" begged the question more integrated than what? It is ambiguous as it could mean more in addition to what has gone before, or more meaning better integrated than previously. "To deliver **better** integrated and sustainable patterns of land use, movement, activity and development" could mean to improve on what exists and to aim for higher standards in new development. The objective itself was interpreted as potentially covering all aspects associated with sustainable land use, movement, activity (taken to mean human activity so included energy efficiency and waste recycling) and development. The interpretation of activity is important as the Issues and Options paper had the words "and contribute to the creation of sustainable communities" added to it. It is proposed this is dropped so the "activity" needs to be loaded in its interpretation. It would be better to include the wording "and contribute to the creation of sustainable communities" because it can be more clearly linked to aspects such as energy efficiency and waste recycling. Appraisal of the policies designed to articulate the objective reveals whether the broad interpretation will be delivered.

Plan Objective 2 Settlement Policy
The objective wording would be strengthened by substituting "making greater use of previously development land "with "maximising the use of previously developed land". Also there is a need to personalise the final sentence i.e. where access to day to day facilities is not restricted to those with the use of private cars.

Table 5.2: Comparison of SA objectives with Core Strategy objectives

Plan Objectives → / SEA Objectives ↓	1. Sustainable Development and Sustainable Communities	2. Settlement Policy	3. Countryside	4. New Housing	5. Meeting Housing Demand	6. Economic Development	7. The Rural Economy	8. Tourism	9. Retail Centres	10. Transport	11. Protecting and Enhancing the Environment	12. Climate change	13. Physical and Community Infrastructure	14. Local Services	15. Leisure
1. To improve the health of the population overall	✓ Integrated land use means more walking/cycling to work	✓ Not restricting access to car use = more walking/cycling	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	✓ Aims to reduce need to travel by car = more cycling/walking	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	✓ Local leisure facilities could help improve health
2. To maintain and improve levels of education and skills in the population overall	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated
3. To reduce crime and anti-social activity	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	✓ Local leisure facilities could reduce youth crime (e.g. Glemsford)
4. To reduce poverty and social exclusion	✓ Integrated development will recognise problem of poverty		✓ Aims to increase prosperity in rural areas	✓ Provides for housing for young and elderly	✓ Provides for housing for young and elderly	✓ More employment = less poverty	✓ More employment = less poverty	✓ More employment = less poverty	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	✓ Aims to provide local facilities for disadvantaged	0 Unrelated
5. To improve access to key services for all sectors of the population	✓ Integrated development means key services will be available	✓ Allows for access to services	✓ Aims to encourage accessible countryside	✓ Locational policy	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	✓ Encourages retention of local services	0 Unrelated	0 Unrelated	0 Unrelated	✓ Aims to provide local facilities	✓ Aims to provide local facilities	0 Unrelated
6. To offer everybody the opportunity for rewarding and satisfying employment	✓ Integrated development will include employment opportunities		0 Unrelated	✓ Locational policy	0 Unrelated	✓ Aims to increase employment	✓ Aims to increase employment	✓ Aims to increase employment	✓ Aims to increase employment in town centres	0 Unrelated	0 Unrelated	0 Unrelated	✓ Improved transport links allow people to commute to better jobs	0 Unrelated	0 Unrelated
7. To meet the housing requirements of the whole community	✓ Sustainable development looks at needs of whole community	✓ Ensures distribution of housing is balanced	0 Unrelated	✓ Provides for housing for young and elderly	✓ Provides for housing for young and elderly	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated
8. To improve the quality of where people live and to encourage community participation	✓ Sustainable communities aims for improved quality of life	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	✓ Aims to improve town centres	0 Unrelated	✓ Aims to enhance the culture and heritage of the area	✓ Aims to integrate social, recreational and economic actions	✓ Aims to provide local facilities	✓ Aims to provide local facilities	✓ Aims to provide local facilities and community participation
9. To maintain and where possible improve air quality	✓ Integrated land use means less car trips	✓ Not restricting access to car use = less car trips	0 Unrelated	? Considers generation of traffic		X More economic activity may mean more traffic	X More economic activity may mean more traffic		X Increasing tourism may increase traffic	✓ Aims to reduce need to travel by car	0 Unrelated	✓ Aims to minimise the risk of pollution	0 Unrelated	✓ Local facilities reduce need to travel	0 Unrelated
10. To maintain and where possible improve water quality	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	✓ Aims to minimise the risk of pollution	0 Unrelated	0 Unrelated	0 Unrelated
11. To conserve soil resources and quality	✓ Sustainable development seeks to conserve natural environment	✓ Aims to make greater use of PDL	0 Unrelated	X New housing may need to be built on greenfield sites	X New housing may need to be built on greenfield sites	X New employment land sites may be greenfield	X New employment land sites may be greenfield	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated

Plan Objectives → / SEA Objectives ↓	1. Sustainable Development and Sustainable Communities	2. Settlement Policy	3. Countryside	4. New Housing	5. Meeting Housing Demand	6. Economic Development	7. The Rural Economy	8. Tourism	9. Retail Centres	10. Transport	11. Protecting and Enhancing the Environment	12. Climate change	13. Physical and Community Infrastructure	14. Local Services	15. Leisure
12. To use water and mineral resources efficiently, and re-use and recycle where possible	✓ Sustainable development principles seek to deal with effects of climate change	0 Unrelated	? Sustainability	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated
13. To reduce waste	✓ Sustainable communities will aim to reduce waste	0 Unrelated	? Sustainability	X New housing may mean more waste	X New housing may mean more waste	X Economic development may mean more waste	X Economic development may mean more waste	X More tourists means more waste	X Increased activity may mean more waste	0 Unrelated	0 Unrelated	✓ Aims to reduce waste	0 Unrelated	0 Unrelated	0 Unrelated
14. To reduce the effects of traffic on the environment	✓ Integrated land use means less car trips	✓ Access not restricted to those with cars	✓ Considers generation of traffic	X New housing may increase traffic	X New housing may increase traffic	✓ Seeks to locate near primary road network and public transport	? Aims not to generate traffic that can't be accommodated	X Increasing tourism may increase traffic	✓ Encourages people to shop locally	✓ Aims to reduce trips	0 Unrelated	0 Unrelated	0 Unrelated	✓ Providing local services reduces need to travel	0 Unrelated
15. To reduce emissions of greenhouse gasses from energy consumption	✓ Sustainable communities will aim to reduce energy consumption	✓ Aims for sustainable building principles	0 Unrelated	X New housing may mean more energy use	X New housing may mean more energy use	X Economic development may mean more energy use	X Economic development may mean more energy use	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	✓ Aims to minimise greenhouse gas emissions and use renewable energy	0 Unrelated	0 Unrelated	0 Unrelated
16. To reduce vulnerability to flooding	✓ Sustainable development will avoid flood risk areas	✓ Aims to respect character of settlements	? Sustainability	X New housing may be built in flood plains	X New housing may be built in flood plains	X New development may be on flood plains	X New development may be on flood plains	0 Unrelated	X Some town centres are in flood zones	0 Unrelated	0 Unrelated	✓ Aims to reduce vulnerability to flooding	0 Unrelated	0 Unrelated	0 Unrelated
17. To conserve and enhance biodiversity and geodiversity	✓ Sustainable development will protect or enhance bio and geodiversity.	X PDL sites may he more biodiverse than agricultural land	✓ Aims to protect and enhance environment and biodiversity	X New housing may be built on biodiversity sites	X New housing may be built on biodiversity sites	X New development may be built on biodiversity sites	? Protects nature conservation	✓ Aims not to compromise quality of natural environment	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated
18. To conserve and where appropriate enhance areas of historical and archaeological importance	✓ Sustainable development will respect areas of historical and cultural value	✓ Aims to respect character of settlements	✓ Respects historical and cultural value	X New housing may be built on archaeological or historical sites	X New housing may be built on archaeological or historical sites	X New development may be built on archaeology or historical sites	✓ Retain redundant buildings to prevent neglect	? Possible maintenance of historic buildings	0 Unrelated	0 Unrelated	✓ Aims to enhance the culture and heritage of the area	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	✓ Sustainable development will respect character of settlements & landscape	✓ Aims to respect character of settlements	✓ Aims to enhance quality of built & natural landscape	X New housing may spoil distinctiveness of landscape/townscapes	X New housing may spoil distinctiveness of landscape/townscapes	X New development may spoil distinctiveness of landscape/townscapes	✓ Protects landscape	X Redevelopment could change townscape	0 Unrelated	0 Unrelated	✓ Aims to reduce impact of new developments	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	✓ Co-location of housing and development will encourage economic growth	✓ Aims to ensure housing and job numbers are balanced	✓ Aims to secure prosperity of rural areas	0 Unrelated	0 Unrelated	✓ Aims for Economic growth	✓ Aims for Economic growth	✓ Aims for increase in tourism business	✓ Revitalising town centres will increase employment	0 Unrelated	0 Unrelated	✓ Strategy for dealing with flood risk areas	0 Unrelated	0 Unrelated	0 Unrelated
21. To revitalise town centres	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	✓ Aims to revitalise town centres	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated
22. To encourage efficient patterns of movement in support of economic growth	✓ Aims to deliver integrated patterns of land use	✓ Aims to deliver integrated patterns of land use	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	✓ Hierarchy of towns identified	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	✓ Providing local services reduces need to travel	0 Unrelated
23. To encourage and accommodate both indigenous and inward investment	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	✓ Aims to foster towns	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	✓ Improved transport infrastructure may increase investment	0 Unrelated	0 Unrelated

5.3. Mitigation measures proposed

For several of the negative correlations discussed above, mitigation is quite straightforward. Development in areas of biodiversity, archaeological, cultural or landscape/townscape-related importance can be avoided through careful planning. Using greenfield sites is more difficult to avoid given the housing and employment land targets, but their use can be reduced through maximum utilisation of brownfield sites. Similarly, zero development in flood zones in existing urban areas is not entirely practical, though flood defence schemes can help mitigate the risks.

The issues of increased waste production and energy usage as a result of development are also mitigatable to some extent. Waste plans and minimum standards of energy efficiency or the inclusion of renewable energy sources can be added as a condition of development.

An increase in traffic is the most difficult issue to address, as it is unrealistic to expect that every new resident of the district would use public or sustainable transport all the time. However, some mitigation can be done through the use of travel plans and improving public transport connectivity and information.

The following appraisal will show that all of these 'mitigation' actions are captured in specific policy statements with the single exception of the use of brownfield sites. Table 5.2 clearly shows that the aim is make greater use of previously developed land (PDL or brownfield) is included in objective 2 Settlement Policy but it is not well reflected in policy statements covering development for employment or other uses.

6. PLAN POLICIES

The strategic policies described in section 3.2 form the basis for undertaking the sustainability appraisal. They were compared against alternative options based upon previous iterations of the core strategy in order to give a truer assessment of their sustainability.

The aim of this appraisal is to set out the main sustainability implications of each policy. This enables possible mitigation actions to be identified which will facilitate consideration of combinations of policies at the local level.

6.1. Significant effects of the policies and alternatives

The policies and their alternatives were assessed against the 23 SA objectives listed in the previous chapter using the scoring system in Table 6.1. For each SA objective the impact on the indicators associated with them (see Appendix 2) were considered and possible direction of impact recorded.

Table 6.1: SA scoring system

Symbol	Effect
++	Strong positive
+	Positive
0/+	Weak positive
0	Neutral
-/0	Weak negative
-	Negative
--	Strong negative
+/-	Both positive and negative

A summary of the results can be seen in Table 6.2, whilst the full results for each policy option can be seen in Appendix 4. Appendix 4 also records any secondary, short, medium or long term effects for each policy and options. Synergistic effects have been noted with the secondary effects. The overview and summary is based on the long term effects.

6.2. Results of the appraisal

The 24 core strategy policies appraised produced a total of 160 positive correlations (of which 29 were strong positives and two were weak positives), 30 negative correlations, 8 uncertains and 353 neutrals. The assessments of the policies and their alternatives are detailed in the following sections.

Sustainable development and sustainable communities
Policy CS1 (sustainable development) comes out of the appraisal with a relatively high score of +21, and was not found to have any negative effects. However, the alternative against which it was compared, the sustainability principles of the Regional Spatial Strategy (RSS), scored more highly. Whilst CS1 scored better on access to key services, air quality and traffic, the RSS principles achieved higher marks for its effect on reducing poverty and social exclusion, opportunities for employment, water and soil quality, bio/geodiversity and achieving economic growth.

Settlement policy
Policy CS2 (settlement hierarchy) was appraised against three alternative options; a hierarchy based on physical size (i.e. ignoring service provision), a simpler hierarchy in which other villages and countryside were treated the same, and a hierarchy with an additional level between market town and key service centre for Wickham Market and the Trimleys.

Table 6.2: Appraisal results of the 24 strategic policies

Strategic Policies	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
1. To improve the health of the population overall	+	+	+	0	0	0	0	0	0	0	+	+	0	+	0	+	+	0	-	0	+	+	++	+	+12
2. To maintain and improve levels of education and skills in the population overall	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	+	+2
3. To reduce crime and anti-social activity	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	+	0	+	0	+3
4. To reduce poverty and social exclusion	+	0	++	0	-	0	+	++	0	+	0	+	0	0	0	0	0	0	++	-	+	+	0	+	+11
5. To improve access to key services for all sectors of the population	++	+	+	0	0	-	0	0	0	0	+	+	0	0	0	0	0	0	0	0	++	++	0	0	+9
6. To offer everybody the opportunity for rewarding and satisfying employment	+	0	+	0	0	-	+	++	0/+	+	+	0	+	+	+/-	+	0	+	++	-	+	+	0	0	+13 ½
7. To meet the housing requirements of the whole community	+	+	+	+	-	0	0	0	0	0	0	0	0	0	-	0	0	0	++	-	0	0	0	0	+3
8. To improve the quality of where people live and to encourage community participation	+	0	+	0	0	0	0	0	0	0	0	0	0	+	0	++	0	0	+	0	+	+	+	+	+10
9. To maintain and where possible improve air quality	++	+	+	-	0	+	-	+	+/-	0	+	+	+/-	0	0	+	+	0	++	0	+	+	+	0	+13
10. To maintain and where possible improve water quality	+	0	0	0	0	0	0	+	0	0	0	0	0	++	0	0	0	0	+	0	0	0	0	0	+5
11. To conserve soil resources and quality	+	0	+	-	0	0	-	+	-	0	0	0	0	0	+	0	0	0	-	0	0	0	0	0	0
12. To use water and mineral resources efficiently, and re-use and recycle where possible	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	+	++	0	+	0	0	0	0	0	+5
13. To reduce waste	0	0	0	-	0	0	-	0	0	0	0	0	0	0	0	0	++	0	--	0	0	0	0	0	-2
14. To reduce the effects of traffic on the environment	++	+	+	-	0	+	-	+	+/-	0	+	+	+/-	0	0	+	0	0	+	0	+	+	+	0	+11
15. To reduce emissions of greenhouse gasses from energy consumption	0	0	0	-	0	0	-	0	0	0	0	0	0	0	0	+	++	+	0	0	0	0	0	0	+2
16. To reduce vulnerability to flooding	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	++	0	0	0	0	+4
17. To conserve and enhance biodiversity and geodiversity	+	0	++	-	0	0	-	+	0	0	0	0	0	++	0	0	+	+	+	0	0	0	0	+	+8
18. To conserve and where appropriate enhance areas of historical and archaeological importance	+	0	+	-	0	0	-	+	0	0	0	0	0	0	0	++	0	+	0	0	0	0	0	0	+4
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+	+	++	0	0	0	0	+	+	0	0	0	0	0	++	++	0	+	+	0	0	0	0	+	+13
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	0	+	0	0	-	+	++	0/+	+	+	0	0	+	+/-	+	0	+	++	-	+	+	0	0	+12 ½
21. To revitalise town centres	+	0	0	0	0	+	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	+5
22. To encourage efficient patterns of move-ment in support of economic growth	++	+	+	0	0	+	-	0	+/-	0	+	+	+/-	0	0	+	0	0	+	0	++	+	+	0	+12
23. To encourage and accommodate both indigenous and inward investment	0	0	0	0	0	+	+	0	0	+	0	0	+	0	0	+	0	0	0	-	0	0	0	0	+4
OVERALL SCORE	**+21**	**+7**	**+17**	**-5**	**-2**	**+2**	**-4**	**+13**	**+2**	**+5**	**+8**	**+6**	**+2**	**+8**	**+2**	**+15**	**+9**	**+6**	**+15**	**-3**	**+13**	**+10**	**+7**	**+6**	**160**

48

Although CS2 was found to have an overall positive score (+7) with no negatives, and scored more highly than the options of a simpler hierarchy (+5.5) or one based on physical size (-4), it was found to be worse than the third alternative (an additional level between market town and key service centre), which scored +8. The latter alternative scored more highly on the related issues of improving air quality and reducing traffic as it would potentially allocate more development to Wickham Market and the Trimleys, both of which are well served by public transport in having train stations.

An additional option of designating Wickham Market as a market town rather than a key service centre also scored positively (+5), primarily due to its public transport links and the potential for improving air quality and reducing traffic generation. This alternative was also affected by the aforementioned issue of conserving landscapes and townscapes.

Countryside
The assessment of policy CS3 (development in the countryside) produced a positive result, with a score of +17 and no negatives. Although the alternative, continuing with the existing policy of restraint, scored +16, it did outscore CS3 on the issues of health (as it allows for the development of local leisure facilities), reducing greenhouse gas emissions (by allowing development of renewable energy projects), reducing vulnerability to flooding (by allowing the development of coastal defence projects) and economic growth (by allowing development for employment and tourism).

New housing
Policy CS4 (meeting housing requirements) was assessed alone, as the preferred option for housing distribution was kept separate. The policy itself scored -5, with positives for meeting housing requirements and using water and mineral resources efficiently, but negatives for using greenfield land, reducing traffic and its effect on air quality, reducing waste and greenhouse gas emissions and potential damage to wildlife and archaeological sites.

The preferred option for housing distribution (i.e. 29% in the Ipswich Policy Area, 31% in Felixstowe, Walton and the Trimleys, 25% in the market towns, and 16% in other settlements) was compared against two alternatives; a 50/50 split between the IPA and Felixstowe and the Trimleys, or a split between the IPA, Felixstowe, the Trimleys and the market towns. All three options scored negatively overall, largely due to the same reasons as policy CS4.

However, there were differences between them; the preferred option scored -10, the split between the IPA, Felixstowe, the Trimleys and the market towns scored -8, and the 50/50 split option scored -7. Whilst the preferred option scored better on meeting housing requirements (as it would provide housing throughout the district, rather than limiting it to specific places), it scored badly on commuting and air quality (as locating housing in areas away from concentrations of employment (such as Felixstowe or the IPA) would generate more and longer trips). The 50/50 split scored the highest as although it fails to meet the housing requirements of most of the district, it allowed for shorter community trips, less air pollution (avoiding Woodbridge, the only location in Suffolk Coastal with an Air Quality Management Area (AQMA)) and avoided development in areas with a high density of wildlife sites.

In addition to the alternative options for housing distribution were four options for the expansion of Felixstowe; the north-west, north and north-east, in the Trimley parishes or north of the A14 at Trimley St Martin. Of these, the most sustainable option appears to be the north-west. Whilst there are concerns over noise (due to its proximity to the A14) and potential damage to archaeological and wildlife sites, it is the best location in terms of access to public transport (as the railway line passes through it, there is the possibility of a new station being opened). Development to the north and north-east of the town is an issue due to flood risk

and potential damage to the Suffolk Coast & Heaths AONB, whilst development in the Trimley parishes may also affect the AONB.

Meeting housing demand
Policy CS5 (affordable housing) appears to reduce the proportion of affordable houses to 24% of new housing. It is noted that at regional level the expectation is that 35% of housing coming forward will be affordable. The proposal for 24% stems from the findings of a Housing Needs Study (July 2006). With a score of -2, this did not compare favourably with the alternative scenarios of 33% (+2), or 33% and 66% in rural edge-of-village sites (+3), scoring worse on reducing social exclusion and meeting the housing requirements of the whole community. However, there is a concern that raising the affordability quota for rural edge-of-village sites may result in poorer people living in areas with less access to employment.

Economic development
The assessment of policy CS6 (employment site hierarchy) shows a marginally positive overall score. Although there are issues regarding its restrictions on development in rural areas, which may in turn limit the growth of the rural economy, it seeks to locate development in locations where housing development is to take place, potentially reducing trip generation and length.

Alongside CS6 we assessed two policies on retaining employment land; the current policy and one with an emphasis on retaining employment land. Of these, the current policy scored highest (+9), its only negative being the fact that it may reduce the number of potential sites for housing. The alternative policy scored only +1, as it allowed employment land to be lost to other uses.

Policy CS7 (new jobs) was also found to have a negative score (-4), largely due to the effects of development on greenfield land, increases in waste, traffic and energy use caused by new development, and potential damage to wildlife and archaeological sites, though it scored positively on reducing poverty and providing employment and economic growth.

The rural economy
Policy CS8 (economic development in the countryside) was compared against three alternatives; a very restrictive policy, a continuation of the existing approach, and the approach required by the government. CS8 was found to be the most sustainable with a score of +13 and no negatives. The approach required by government scored +10, but outscored CS8 on the issues of conserving soil resources (as it aims to make best use of brownfield sites and only allows small scale development) and conserving landscapes/townscapes (as it aims to use existing buildings, retain redundant ones of proven value and takes into account landscape impact). The very restrictive policy scored +7.5 and also outscored CS8 on the conserving soil resources as it does not allow land required for agriculture to be lost, as well as conserving historical/archaeological sites (as it restricted development so much). The existing approach scored only +3.5, though it was the only option to score on the encouraging inward investment indicator, as it allows for the provision of non-agricultural employment land.

Tourism
Policy CS9 (tourism) was compared with two other options; a continuation of the existing policy, or to apply as discerning policy. Although CS9 scored positively (+2), the existing policy gained a higher score (+6.5), largely as it proposed assessing proposals against their environmental impact. The discerning policy scored -0.5.

Retail centres
The assessment of policy CS10 (retail floorspace) showed it to be generally positive (+5) and with no negatives. Policy CS11 (retail hierarchy) was compared with an option of allowing significant levels of development in the Ipswich Policy Area. CS11 proved to more

sustainable, scoring +8 (with no negatives), compared to just +1 for significant development in the IPA (which may damage local services elsewhere and generate more car trips).

Transport
There were two policies assessed for transport; CS12 (travel) and CS13 (connectivity). Whilst CS12 scored +6 and no negatives, the impact of CS13 (overall score of +2) was less certain; although it aims to improve the connectivity of public transport, thereby reducing traffic and improving air quality, and also potentially improving access to employment, it also states support for the improvement of transport links to Stansted Airport, encouraging the use of air travel. Although it could result in more commuter movements in and out of the County, the policy does encourage the use of sustainable modes.

Protecting and enhancing the physical environment
Under this objective, three policies (CS14 (biodiversity), CS15 (landscape) and CS16 (Design)) were assessed, alongside options for Special Landscape Area designations. All three policies achieved positive scores, with only CS15 having a negative score for any one indicator (there is a concern that it may block the development of rural needs housing).

The three options for Special Landscape Area were (i) to retain the current designation, (ii) expand the designation, or (iii) to reduce the amount of land designated as SLA. Option (i) scored zero, as it would result in no change to the current situation, and therefore is inherently neutral; Option (ii) scored +1, as it would mean more landscape was protected and that less greenfield land may be used, though it would make it more difficult to designate sites for housing or employment, whilst option (iii) scored -1, as although it would make it easier to designate housing or employment sites, it may damage the landscape and use greenfield sites.

Climate change
For climate change there were four policies to be assessed; CS17 (construction), CS18 (renewable energy), CS19 (nuclear power) and CS20 (environmental risk). The first two scored positively, with no negatives (+9and +6). CS19 scored positively overall (+15), though there were concerns about its impact on health (potential for a nuclear accident), the use of greenfield land and on-site storage of nuclear waste. Policy CS20 scored negatively (-3), as although it takes into account flooding and coastal erosion, it may constrain development of land for employment or housing.

An additional assessment was carried out on two options regarding development in flood risk zone 3 (i.e. high risk); either to allow no development at all, or to allow some based on a sequential approach. Whilst the former scored positively in terms of reducing flood risk and improving water quality, it gained an overall score of -6 as it would constrain housing and employment land growth. The second option scored +8, with most of its scores the reverse of the former.

Physical and community infrastructure
The one policy for physical and community infrastructure, CS21 (infrastructure) was assessed as positive (+13), with no negative aspects.

Local services
There was also only one policy for local services, CS22, which scored +10, with no negatives.

Leisure
Two policies, CS23 (sport and play) and CS24 (green space) were assessed under the leisure objective. Both had positive scores (+7 and +6 respectively), with no negative aspects.

In addition to looking at the sustainability of the individual policies and their alternatives there is also a need to look at the cumulative effect of the 'basket' of preferred policies, as currently proposed. This may change, if recommendations about individual policies are adopted (see section 6.3 below).

Table 6.2 summarises the results for all the preferred policies. The lowest scoring SA objective is 13 (to reduce waste). However it does score positively under CS17 Construction where the plan policy states it will look to "Make provision for waste minimisation and recycling". This means that the application of CS17 in tandem with any other policy in the plan will mean that a reduction in waste will be sought. The strong negative impact for CS 19 is due to the acceptance on site of nuclear waste at Sizewell. Monitoring of radioactivity levels in the area will enable identification of the need for mitigation actions.

The plan as a whole does not have a strong policy to conserve soil resources and quality. The overall score is 0 for this SA objective although 4 policies have a brief reference. These references are not specific e.g. CS2 (conserve and enhance the natural and built environment) or CS17 (Ensure prudent use of natural resources). To make better use of previously developed land is mentioned in the overall objective of the settlement policy but this is directed at housing allocations only. There is no clear statement that a sequential approach will be taken, looking to develop brownfield before greenfield as far as possible. The Secretary of State's Proposed Changes and Further Proposed Changes to the Draft Revision to the Regional Spatial Strategy for the East of England (RSS) October 2007 includes in policy SS2 a requirement for LDDs to develop policies which "adopt an approach to the location of major development which priorities the re-use of previously developed land …with an overall target for 60% of development to be on previously developed land (PDL). Whilst the availability of PDL has been taken into account in the development of proposals for the location of housing development in Suffolk Coastal (as evidenced by the supporting text to CS4), there is no overall policy prioritising use of PDL or local target set.

Although SA objective 2 (to maintain and improve levels of education and skills in the population overall) is low scoring, it is significant that 2 policies score positively including CS 21 Infrastructure (in terms of providing necessary facilities) and CS24 (green space) which aims to improve understanding of ecology by improving access to green spaces.

SA 15 (to reduce emission of greenhouse gases) scores negatively for 2 policies because providing new housing or employment will mean more energy use but this is mitigated by CS17 Construction which requires consideration of energy reduction in all proposals for development.

The only negative secondary effects identified in the appraisal are linked to CS9 (tourism). There is a danger that increased tourism will encourage second home ownership, reducing housing available to local people. Increased numbers of tourists to some areas where there is high second home ownership may help support key local services but the benefit of this is lost if more second owners are attracted. Possible synergistic effects identified are where the provision of a modest level of new housing in a rural location could meet a threshold that results in the provision of recycling facilities (e.g. plastic recycling is not available throughout the district) or makes a local renewable energy scheme viable.

6.3. Proposed mitigation measures
Whilst in many cases the preferred policies put forward in the core strategy were assessed as being entirely positive, on 31 occasions they were found to have negative impacts. In some cases, these impacts can be mitigated to the extent whereby the impact is removed entirely, though in others it may be only partially mitigable, or not at all.

Many of the negative scores were related to the location of development for housing or employment land. These consisted of concerns over the use of greenfield sites, location in flood risk zones, and potential damage to biodiversity, archaeological sites, conservation areas and landscapes. However, some of these issues are mitigated, as policies exist to specifically deal with the flood risk (CS20), biodiversity (CS14) and landscape (CS15) and sympathetic design of new buildings (CS16). Careful site selection (i.e. using brownfield land and avoiding protected sites) would also help mitigate the sustainability impacts but these are not strongly reflected in policies. Archaeological sites, Conservation Areas, and Listed Buildings are not specifically mentioned in policies – only general statements are made about the protection of the natural and built environment, which do not reflect the specific assets that are in Suffolk Coastal. Of particular concern is the way the Area of Outstanding Natural Beauty (AONB) is only mentioned in a policy concerning tourism, CS9. More general recognition of the importance of the AONB is needed with it either being mentioned in CS15 or in the supporting text to that policy.

An additional issue regarding new development was an increase in waste production and energy use. Whilst this may be seen as an inevitable consequence of development, both are possible to mitigate and are covered by CS17 (construction). . New developments could be required to produce a certain amount of renewable energy (e.g. through wind turbines or by using CHP systems) and meet stringent energy efficiency standards. Policy CS18 (renewable energy) is cautious in its support for renewable schemes – it could be used to support community facilities but is less explicit in support for household level facilities such as solar panels. In terms of waste, developments could require a waste plan, and ensure that there is sufficient space made for a range of recycling facilities. Policy CS17 seeks minimisation of waste and recycling and is adequate mitigation.

In other cases, policy-specific solutions are required. Policy CS1 (sustainable development), which scored lower than the RSS policy, could be amended to place more focus on the issues on which it was bettered by the RSS, i.e. reducing poverty and social exclusion, opportunities for employment, water and soil quality, bio/geodiversity and achieving economic growth. It would help if the phrase "effects of climate change" and "sustainability principles" used in the policy wording were better explained, either in the policy itself or the supporting text. It could make clear the approach to use of PDL for example.

Policy CS3 scored more highly overall than the alternative option, but was outscored on some indicators. This could be remedied by a greater focus on health, reducing greenhouse gas emissions, reducing vulnerability to flooding and economic growth.

For policy CS5 (affordable housing), it is clear that the appraisal suggests that 33% with 66% for edge-of-village rural sites is preferable to CS5 (24%) or the option of a blanket 33% quota. However if the Local Housing needs survey suggests that the % of affordable does not need to be as high as the RSS 35% target in Suffolk Coastal then no mitigating action is necessary except monitoring. Suffolk Coastal District Council need to be sure that their Housing Needs Survey covers the needs for affordable very sheltered housing for its aging population, as many may not have inflation proofed resources. Neither CS3 nor CS4 mentions the need for very sheltered housing. This could be mitigated by mentioning the range of different types of housing needed and monitoring the stock, % and number of very sheltered units built.

The implementation of CS6 concerning the employment site hierarchy suggested there could be issues regarding the way it would restrict development in the rural areas. It would be helpful if the supporting text to this policy mentioned that there is a specific policy seeking to control development in the countryside (CS8) as CS8 scored well in terms of its sensitivity to sustainability issues.

The negative effects of CS7 the policy for new jobs are mitigated by the policy operating in tandem with CS12 which seeks to control the location of development to where realistic alternatives to private car use, requiring a travel plan for any major developments. This will help mitigate possible negative effects on air quality (due to traffic) and the effects of traffic on the environment. The wording of CS7 does not reflect a policy of using brownfield land before greenfield (although mention is made of protecting existing employment land which by definition will be brownfield). This shortcoming has already been noted.

Policy CS9 (tourism) was outscored by the alternative of continuing with existing policy. A solution to this is for the policy to include the aim of assessing proposals against their environmental impact.

Although policy CS13 (connectivity) scored +2, it could be improved by withdrawing its support for improved connections to Stansted Airport.

The concern about the negative effect of CS15 Landscape on rural needs housing is sufficiently mitigated by the settlement policies CS2 and CS4.

Health concerns and storage of nuclear waste on site noted in connection with CS19 (nuclear power) cannot be directly mitigated but should be monitored by reporting on radioactivity levels. Consideration of social issues associated with housing construction workers is considered but it may be worth noting in the text that concerns may more specialist in terms of dealing with the needs of foreign migrant workers (for example East Europeans who may have cultural and language issues).

The wording of CS20 (environmental risk), dealing with flood and coastal erosion risk, is not that strongly worded considering it is a key policy that has to work alongside others, controlling what they might allow. Further guidance will be available when the strategic flood risk assessment is available and it is recommended that further consideration is given to the wording of the policy to clarify that some development may not be allowed in areas of flood risk.

One issue which came up on several policies is more difficult to mitigate. This concerns traffic, and the related indicator of air quality. Although it is effectively impossible to completely prevent the generation of new traffic, it is possible to reduce its effects somewhat by locating development near good public transport links, improving connectivity with existing public transport, or by encouraging walking or cycling through the installation of accessible and safe walkways and cycle paths. CS12 Travel specifically seeks to encourage use of alternative modes of transport and CS13 Connectivity encourages improvement of bus and rail services.

6.4. Other considerations
No mention is made of the operation of any type of exclusion zone for housing or employment development around the nuclear power site or how this might change if the site is expanded.

6.5. How problems were considered in developing policies and proposals
Sustainability issues raised will be considered in the development of the final wording of the preferred policies, following a period of consultation on this Sustainability Report and the Core Strategy Preferred Options.

6.6. Uncertainties and risks
As mentioned in the text, there are several impacts which could be either positive or negative depending on how the policies are implemented. This is in particular regard to policy CS13, which puts forwards positive ideas regarding the connectivity of public transport, but also appears to encourage air travel.

6.7. General conclusions
The implementation of the preferred policies as a group of policies that can act in tandem are appraised as having the potential to improve sustainability in Suffolk Coastal. Most likely significant effects appear to be for offering everybody the opportunity for employment, achieving sustainable levels of prosperity and economic growth throughout the plan area and encouraging efficient patterns of movement in support of economic growth. Improving the health of the population, maintaining and improving air quality and conserving and enhancing the quality and local distinctiveness of landscapes and townscapes also are strong likely outcomes. The specific policy recommendations could further improve the level of sustainability. There are only two general concerns:

- The lack of a strong policy to conserve soil resources and quality
- The general level of protection given to the special qualities of the AONB, as opposed to landscape in general.

Both of these reflect national policy, so do not need to be repeated in DPD policies. However it would be helpful to plan users to be reminded of this in the supporting text of the plan. The availability of brownfield land in settlements has been assessed and land allocations made accordingly but there still needs to be a clear requirement for a sequential approach to the development of land to be considered as proposals arise. The AONB is specifically protected from tourism development but needs to be protected from all other types of development as these could equally damage this unique environmental resource. Acknowledgement of this in the supporting text to CS 15 Landscape is needed as a minimum.

6.7.1. Specific policy recommendations
Policy CS1 (sustainable development): scored lower than the RSS policy, and could be amended to place more focus on the issues on which it was bettered by the RSS, i.e. reducing poverty and social exclusion, opportunities for employment, water and soil quality, bio/geodiversity and achieving economic growth. The phrase "effects of climate change" and "sustainability principles" used in the policy wording need to be better explained, either in the policy itself or the supporting text. Clarification of the intention to prioritise development of PDL is needed where possible.

CS2 (settlement policy): An alternative policy introducing an additional level between market town and key service centre appeared to be more sustainable than the preferred policy because it would potentially allocate more development to Wickham Market and the Trimleys, both of which are well served by public transport as they have train stations. Consideration should be given to the overall ability of Wickham Market to expand as Figure 4.1 shows the extent to which the Conservation Area and Special Landscape Area could constrain future development. It would appear that there is still some potential.

CS3 scored more highly overall than the alternative option, but was outscored on some indicators. This could be addressed by including mention of health needs (e.g. Meeting local social and health needs) as this would more clearly include local leisure facilities. Other aspects where CS3 was outscored are not a concern because other policies in the plan will operate to enable renewable energy schemes (CS18) to go ahead if appropriate (thereby reducing greenhouse gas emissions), reduce vulnerability to flooding (CS19) and allow economic growth (CS8) . The alternative policy only scored higher on these aspects because it specially mentioned them in the policy wording.

CS5 (affordable housing): It is noted that SCDC is setting a target of 24 % for affordable housing whereas the expectation at regional level is 35%. SCDC need to assure themselves that their Housing Survey is robust to the need for very sheltered accommodation for an aging population in accepting a lower target level for affordable housing than they have had in the past and as suggested by the RSS. In addition to keeping this Housing Survey under review

and monitoring the number and % of affordable houses built, the stock, % and number of very sheltered units built should be monitored.

CS6 (employment site hierarchy): To deal with any concerns that this policy culd restrict development in the rural areas mention could be made in the supporting text that there is a specific policy seeking to control development in the countryside (CS8). CS8 scored well in terms of its sensitivity to sustainability issues.

CS9 (tourism): The overall sustainability of the preferred policy is not as high as the existing policy. However CS9 will be applied alongside CS15 Landscape; CS16 Design and CS17 Construction but it reads as if the emphasis is on catering for tourism to create economic wealth regardless of the local economic needs. Creating jobs where they are not actually needed will increase traffic and commuting. The wording of this policy needs to better reflect balancing of environmental, economic and social concerns to achieve sustainable development.

CS13 (connectivity): Policy wording should at minimum be amended to say:
- Public transport connections to Stansted airport.
Alternatives should be considered such as encouraging reinstatement of ferry services from Felixstowe to the continent or rail travel to London to pick up Eurostar services.

CS19 (nuclear power): Health concerns and storage of nuclear waste on site noted in connection with CS 19 Nuclear Power should be monitored by reporting on annual radioactivity levels.

CS20 (environmental risk): The policy wording is strengthened to make clear that development may not be permitted in areas of flood risk. (It is recognised that these are yet to be identified in the Strategic Flood Risk Assessment).

6.7.2. Other observations
The future role of foreign economic migrants is not acknowledged in the plan. Information on the current situation is scant but it may be worth seeking to monitor numbers of National Insurance registrations and the activities of major employees recruiting from particular groups. Such groups may have specific cultural and social needs.

7. IMPLEMENTATION

7.1. Link to other tiers of plans and programmes

This sustainability appraisal has been undertaken before the RSS has been approved. The RSS has been published for consultation reflecting a revised Appropriate Assessment. It is possible that further amendments will be made to the RSS that would have a bearing on the Suffolk Coastal Core Strategy.

This sustainability appraisal for the Suffolk Coastal Core Strategy and Policies will form a context for other Suffolk Coastal planning documents, particularly the Site Specific Allocations and Policies, Felixstowe Regeneration Area Action Plan and Leiston and Saxmundham Area Action Plan. Suffolk Coastal also intend to prepare Supplementary Planning Guidance on Affordable Housing so the issue of affordable very sheltered housing to meet the needs of the aging population could be considered here.

7.2. Proposals for monitoring

Table 7.1 shows the proposed key indicators to assist in monitoring achievement of the SA objectives. Some effects cannot be realistically solved by mitigating actions or are uncertain so there is a need to monitor that particular concern. If the concern is realised then action may need to be devised at a later date. The indicators need to be monitored over the life of the core strategy. Some specific indicators have been suggested that do not currently have a baseline, these being sub sets of data sets. Others are known to exist and likely to be important outcome indicators for the review. Appendix 2 sets out the long list of SA indicators with the full definitions that ideally need to be monitored but Table 7.1 focuses on the key concerns, including those raised in the SA itself.

Table 7.1: Proposed Indicators

No	SA Objective	Performance Indicator
1	To improve the health of the population overall	% with access to hospital, doctors or dentist. Death rate plus those for cancer, heart disease, respiratory, self harm, road accidents. Radionuclides in food near Sizewell. Total radiation dose from all sources. Journeys to work & school by sustainable transport. Obesity levels. Change in play, open & natural green space
2	To maintain and improve levels of education and skills in the population overall	A*-C grades at GCSE. A & AS level results. % no qualifications. % NVQ level 4 or higher
3	To reduce crime and anti-social activity	Crime per 1000 population. Violent crime. Fear of crime. Noise & odour complaints.
4	To reduce poverty and social exclusion	% population in 10% most deprived SOAs Housing benefit recipients
5	To improve access to key services for all sectors of the population	% population with access to key local services (food shop, PO, school)
6	To offer everybody the opportunity for rewarding and satisfying employment	Unemployment rate. Average earnings.
7	To meet the housing requirements of the whole community	Homelessness. Affordable housing. Special needs housing including very sheltered accommodation. Number of unfit homes. Average property price to income ratio.
8	To improve the quality of where people live and to encourage community participation	Satisfaction with neighbourhood. Land managed for ecological interest with public access. Accessible green space. Electoral turnout. Parish Plans adopted People involved in volunteer activities. Rate if racist incidents. Visits to museums.
9	To maintain and where possible improve air quality	Air quality. Number of AQMAs.

10	To maintain and where possible improve water quality	Radioactivity in local water. Water quality in rivers. Bathing water quality.
11	To conserve soil resources and quality	Area of Greenfield land developed. % of new dwellings on Brownfield land. Number and % of housing commitments on Greenfield land. Allocations on best and most versatile agricultural land. Area of contaminated land returned to beneficial use.
12	To use water and mineral resources efficiently, and re-use and recycle where possible	Recycled aggregate production. Water consumption. Water availability for water dependent habitats.
13	To reduce waste	Household (and municipal) waste produced. Tonnage recycled, composted & landfilled
14	To reduce the effects of traffic on the environment	Traffic volumes at key locations. % new residential development taking place in major towns, other towns & elsewhere. Distance to key services. Journeys to work & school by sustainable transport
15	To reduce emissions of greenhouse gasses from energy consumption	Domestic electricity & gas consumption. Energy efficiency of homes. Installed electricity capacity using renewable energy.
16	To reduce vulnerability to flooding	Planning applications approved against EA flood risk advise. Properties at risk of flooding from rivers or sea. Incidence of coastal and fluvial flooding (properties affected). Flood warnings issued.
17	To conserve and enhance biodiversity and geodiversity	Change in number, area and condition of designated ecological sites. Achievement of BAP targets. Bird survey results. Change in number, area & condition of designated geological SSSIs or RIGS.
18	To conserve and where appropriate enhance areas of historical and archaeological importance	Change in number of Listed buildings and buildings at risk. Area of historic parks and gardens. Number, area and appraisals completed of Conservation Areas. Number of SAMs damaged by development. Planning permissions affecting known or potential archaeological sites.
19	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Number & % of new dwellings completed on PDL. Number & % housing commitments on PDL. Number of vacant dwellings. Number & % of second homes. Changes in landscape. Change in number & area of village greens and commons. Area of designated landscapes (AONB). Light pollution.
20	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Take up of employment floorspace. Employment permissions and allocations. % change in VAT registered businesses. Number & % of employees by employment division, main industry type and in key sectors (agriculture, IT etc)
21	To revitalise town centres	Vacant units in town centres.
22	To encourage efficient patterns of movement in support of economic growth	Distance to work. Net commuting to district and major towns. Employment permissions in urban areas. Number & % working at home. Number of developments with travel plan submitted as condition of development.% port freight carried by rail. Number of farmers markets and farm shops.
23	To encourage and accommodate both indigenous and inward investment	Number of enquiries to business advise services from within/outside area. Business start ups and closures. Employment land availability. Employment permissions and allocations.

8. GLOSSARY

AA	Appropriate Assessment
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
BREEAM	Building Research Establishment Environmental Assessment Method
CA	Conservation Area
CCTV	Closed-Circuit Television
CLG	Communities and Local Government
dB	Decibel
DC	District Council
EU	European Union
JSA	Job Seeker Allowance
LDF	Local Development Framework
mSv	millisieverts, a measure of dose
ODPM	Office of the Deputy Prime Minister
OMS	Offshore Marine Site
PO	Post Office
PDL	Previously Developed Land
PPS	Planning Policy Statement
RSPB	Royal Society for the Protection of Birds
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SAM	Scheduled Ancient Monument
SCC	Suffolk County Council
SCDC	Suffolk Coastal District Council
SEA	Strategic Environmental Appraisal
SOA	Super Output Area
SPA	Special Protection Area
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
SUDS	Sustainable Urban Drainage System

9. BIBLIOGRAPHY

Suffolk Coastal Local Development Framework Sustainability Appraisal Scoping Report (Suffolk Coastal District Council, June 2006)

Suffolk Coastal Local Development Framework Core Strategy Issues and Options (Suffolk Coastal District Council, February 2007)

Suffolk Coastal Local Development Framework Draft Core Strategy Preferred Options (Suffolk Coastal District Council, November 2007)

Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (Office of the Deputy Prime Minister, November 2005)

Radioactivity in Food and the Environment, 2006 (Cefas, November 2007)

Appendix 1: Quality Assurance Checklist

The checklist below is intended to help test whether the requirements of the SEA Directive are met, and show how effectively the SEA has integrated environmental considerations into the plan-making process. It covers both the technical elements of the SEA and the procedural steps of the SEA process under the Directive.

Quality Assurance checklist	Located in
Objectives and context • The plan's or programme's purpose and objectives are made clear. • Environmental issues and constraints, including international and EC environmental protection objectives, are considered in developing objectives and targets. • SEA objectives, where used, are clearly set out and linked to indicators and targets where appropriate. • Links with other related plans, programmes and policies are identified and explained. • Conflicts that exist between SEA objectives, between SEA and plan objectives and between SEA objectives and other plan objectives are identified and described.	Section 3.2 Scoping report Section 4.6, Appendix 2 Scoping Report, Section 5.1
Scoping • Consultation Bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Environmental Report. • The assessment focuses on significant issues. • Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit. • Reasons are given for eliminating issues from further consideration.	Scoping report Updated in Section 4.2 Scoping report Scoping report
Alternatives • Realistic alternatives are considered for key issues, and the reasons for choosing them are documented. • Alternatives include 'do minimum' and/or 'business as usual' scenarios wherever relevant. • The environmental effects (both adverse and beneficial) of each alternative are identified and compared. • Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained. • Reasons are given for selection or elimination of alternatives.	Section 3.2 Section 3.2 Section 6.2, Appendix 4 Section 6.3 Section 2.4
Baseline information • Relevant aspects of the current state of the environment and their likely evolution without the plan or programme are described. • Environmental characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan. • Difficulties such as deficiencies in information or methods are explained.	Section 4.2 Section 4.3 Section 4.5
Prediction and evaluation of likely significant environmental effects • Effects identified include the types listed in the Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant; other likely environmental effects are also covered, as appropriate. • Both positive and negative effects are considered, and the duration of effects (short, medium or long-term) is addressed. • Likely secondary, cumulative and synergistic effects are identified where practicable.	Section 6.2, Appendix 4 Appendix 4 Appendix 4

• Inter-relationships between effects are considered where practicable.	Section 6.2, Appendix 4
• The prediction and evaluation of effects makes use of relevant accepted standards, regulations, and thresholds.	Appendix 2
• Methods used to evaluate the effects are described.	Section 6.1
Mitigation measures • Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan or programme are indicated.	Sections 5.3 and 6.3
• Issues to be taken into account in project consents are identified.	Section 6.3
The Environmental Report • Is clear and concise in its layout and presentation.	Contents page
• Uses simple, clear language and avoids or explains technical terms.	Throughout
• Uses maps and other illustrations where appropriate.	Section 4.3
• Explains the methodology used.	Section 6.1
• Explains who was consulted and what methods of consultation were used.	Section 2.3
• Identifies sources of information, including expert judgement and matters of opinion.	Section 2.2, Appendix 4
• Contains a non-technical summary covering the overall approach to the SEA, the objectives of the plan, the main options considered, and any changes to the plan resulting from the SEA.	Section 1.1
Consultation • The SEA is consulted on as an integral part of the plan-making process. • Consultation Bodies and the public likely to be affected by, or having an interest in, the plan or programme are consulted in ways and at times which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and Environmental Report.	
Decision-making and information on the decision • The environmental report and the opinions of those consulted are taken into account in finalising and adopting the plan or programme. • An explanation is given of how they have been taken into account. • Reasons are given for choosing the plan or programme as adopted, in the light of other reasonable alternatives considered.	
Monitoring measures • Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SEA.	Section 7.2
• Monitoring is used, where appropriate, during implementation of the plan or programme to make good deficiencies in baseline information in the SEA. • Monitoring enables unforeseen adverse effects to be identified at an early stage. (These effects may include predictions which prove to be incorrect.) • Proposals are made for action in response to significant adverse effects.	

Appendix 2: The SEA Framework

SOCIAL OBJECTIVES

Headline SA Objective	Question	Indicator
1. To improve the health of the population overall	Will it improve the numbers of health facilities and the distance which has to be travelled to these facilities?	Proportion of population with access to hospital or GP or dentist surgery (DfT accessibility indicators)
	Will it reduce death rates?	Overall death rate by all causes (PCT)
		Cancer deaths (malignant neoplasms) under 75 per 100,000 population (PCT)
		Ischaemic Heart Disease deaths under 75 per 100,000 population (PCT)
		Respiratory disease deaths (all ages) per 100,000 population (PCT)
		Deaths from self harm and injury undetermined (all ages) per 100,000 population (PCT)
		Number of people killed and seriously injured in road traffic accidents per 100,000 population (SCC)
		Life expectancy (SDA)
	Will it encourage healthy lifestyles?	Proportion of journeys to work on foot or by cycle (Census/SSAG)
		How do children travel to school? (QOL/BVPI)
		Obesity in the population (PCT)
		Change in existing provision of outdoor playing space (youth and adult space) (SSAG 5-year review)
		Change in existing provision of children's play space (SSAG 5-year review)
		Change in provision of open space (District open space assessments)
		The % of total length of footpaths and other rights of way which are easy to use by members of the public (BVPI)
		Change in amount of accessible natural green space (English Nature Standards)
2. To maintain and improve levels of education and skills in the population overall	Will it improve qualifications and skills of young people?	Proportion of Year 11 pupils gaining 5+ A*-C grades at GCSE (District Wide SDA / BVPI)
		Average point score per student at A and AS Level (District Wide SDA / BVPI)
	Will it improve qualifications and skills of adults?	Proportion of the population with no qualifications (Census)
		Proportion of the population with NVQ level 4 or higher (District Wide SDA)
3. To reduce crime and anti-social	Will it reduce actual levels of crime?	Recorded Crime per 1000 population (SSAG)

Headline SA Objective	Question	Indicator
activity		
		Burglary Rate per 1000 population (SDA)
		Violent Crime Rate per 1000 population (SDA)
	Will it reduce the fear of crime?	Fear of Crime (QOL, Suffolk Speaks, British Crime Survey)
	Will it reduce noise and odour concerns?	Number of domestic noise complaints (NEvironmental Health Depts Districts)
		Number of odour complaints (NEvironmental Health Depts Districts)
4. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	Proportion of the population who live in SOAs that rank within the most deprived 10% and 25% of SOAs in the country (SCC)
		Housing benefit recipients (LAs)
5. To improve access to key services for all sectors of the population	Will it improve accessibility to key local services?	Percentage of rural population living in parishes which have a food shop or general store, post office, pub, primary school and meeting place (SSAG)
		Proportion of population with access to key local services (eg GP, post office) (DfT accessibility indicators)
	Will it improve accessibility to shopping facilities?	New Retail Floor Space in Town Centres (AMR)
		Proportion of population with access to a food shop (DfT accessibility indicators)
	Will it improve access to child care?	Number of child care places per thousand children under 5 (Mark Parker)
6. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce unemployment overall?	Unemployment rate (SSAG/AMR)
	Will it reduce long-term unemployment?	Long-term unemployment (Nomis)
	Will it provide job opportunities for those most in need of employment?	Proportion of lone parents and long term-ill who are economically active (Census)
	Will it help to improve earnings?	Average Earnings (Inland revenue/AMR)
7. To meet the housing requirements of the whole community	Will it reduce homelessness?	Homelessness (districts homelessness presentations)
	Will it provide enough housing?	Housing Stock (SSAG)
		Housing Land Availability (SSAG)
	Will it increase the range and affordability of housing for all social groups?	Affordable Housing (SSAG)
		Special Needs Housing

Headline SA Objective	Question	Indicator
		Housing Types and Sizes (SSAG)
		Dwellings per hectare of Net Developable Area (SSAG)
		Average property price to income ratio (SSAG)
	Will it reduce the number of unfit homes?	Number of unfit homes per 1,000 dwellings (BVPI)
8. To improve the quality of where people live and to encourage community participation	Will it improve the satisfaction of people with their neighbourhood as a place to live?	% of residents who are happy with their neighbourhood as a place to live (Suffolk Speaks/ODPM QOL surveys)
	Will it increase access to natural green space?	Area of land managed in whole or part for its ecological interest and with public access over and above public rights of way (SCC)
		Areas of deficiency in terms of natural green space (SCC)
		Change in amount of accessible natural green space (NEglish Nature standards)
	Will it encourage engagement in decision making?	Electoral turnout in local authority elections
		Number of Parish Plans adopted (Suffolk Acre)
	Will increase the number of people involved in volunteer activities?	Number of people involved in volunteer activities (SCC/CVS)
	Will it improve ethnic relations?	Number / rate of racist incidents (Racial Harassment Initiative)
	Will it improve access to cultural facilities?	Number of visits to/uses of Council funded or part- funded museums per 1,000 population (BVPI 170a)
		Number of visits to Council funded or part- funded museums that were in person, per 1,000 population (BVPI 170b)
		The number of pupils visiting museums and galleries in organised school groups (BVPI 170c)

ENVIRONMENTAL OBJECTIVES

Headline Objective	Question	Indicator
9. To maintain and where possible improve water quality	Will it improve the quality of inland waters?	Water quality in rivers (EA)
		Groundwater quality (may be available from EA in future - CAMS)
	Will it improve the quality of coastal waters?	Water quality in estuaries (EA)
		Bathing water quality (EA)
10. To maintain and where	Will it improve air quality?	Have annual mean concentrations of any of three air pollutants been exceeded?

Headline Objective	Question	Indicator
possible improve air quality		
		Number of Air Quality Management Areas and dwellings affected (SSAG)
11. To conserve soil resources and quality	Will it minimise the loss of greenfield land to development?	Number and percentage of new dwellings completed on greenfield land
		Number and percentage of existing housing commitments on greenfield land (SSAG)
		Dwellings per hectare of net developable area (SSAG)
	Will it minimise loss of the best and most versatile agricultural land to development?	Allocations on best and most versatile agricultural land (grades 1, 2, and 3a)
	Will it maintain and enhance soil quality?	Number and area of potential and declared contaminated land returned to beneficial use (Districts / EA)
		Number / area of organic farms (DEFRA / Soil Association)
12. To use water and mineral resources efficiently, and re-use and recycle where possible	Will it promote sustainable use of minerals?	Recycled aggregate production (SSAG)
	Will it promote sustainable use of water?	Water consumption
	Will it maintain water availability for water dependant habitats?	Water availability for water dependant habitats (NE / Wildlife Trust)
13. To reduce waste	Will it reduce household waste?	Household (and municipal) waste produced (SSAG)
	Will it increase waste recovery and recycling?	Tonnage / proportion of household (and municipal) waste recycled, composted and landfilled (SSAG / BVPI / PSA)
14. To reduce the effects of traffic on the environment	Will if effect traffic volumes?	Traffic volumes in key locations (SCC)
	Will it reduce the need for local travel?	Percentage of all new residential development taking place in major towns, other towns, and elsewhere (SSAG)
		Percentage of rural population living in parishes which have a food shop or general store, post office, pub, primary school and meeting place (SSAG)
		Distance to key services (new accessibility indicators from DfT)
	Will it increase the proportion of journeys made using modes other than the private car?	Percentage of journeys to work undertaken by sustainable modes (SSAG)
		Percentage of schoolchildren travelling to school by sustainable modes (BVPI)
		Car parking standards (SSAG)

Headline Objective	Question	Indicator
15. To reduce emissions of greenhouse gases from energy consumption	Will it reduce emissions of greenhouse gases from energy consumption?	Consumption of electricity - Domestic use per consumer and total commercial /industrial use (DTI)
		Consumption of gas - Domestic use per consumer and total commercial /industrial use (DTI)
		Energy efficiency of homes (BVPI 63 / HECA)
	Will it increase the proportion of energy needs being met by renewable sources?	Installed electricity generating capacity using renewable energy (SSAG)
16. To reduce vulnerability to flooding	Will it minimise future risk and reduce existing risk of flooding to people and property from rivers and watercourses?	Flood risk - planning applications approved against Environment Agency advice (SSAG)
		Properties at risk of flooding from rivers or the sea (EA)
		Incidence of fluvial flooding (properties affected)
	Will it minimise future risk and reduce existing risk of flooding to people and property on the coast?	Incidence of coastal flooding (properties affected)
	Will it minimise future risk and reduce existing risk of coastal erosion?	Developments refused because of risk of coastal erosion (SSAG)
	Will it minimise future risk and reduce existing risk of damage to people and property from storm events?	Incidence of flood watches and warnings (EA)
17. To conserve and enhance biodiversity and geodiversity	Will it maintain and enhance statutory and non-statutory sites designated for their nature conservation interest?	Change in number and area of designated ecological sites (SSAG)
		Reported condition of ecological SSSIs (NE / Wildlife Trust)
	Will it help deliver the targets and actions for habitats and species within the Suffolk Biodiversity Action Plan, particularly those protected under national and international law?	Achievement of Habitat Action Plan targets (SBRC/SBP)
		Achievement of Species Action Plan targets (SBRC/SBP)
		Development proposals affecting BAP habitats, BAP species and legally protected species outside protected areas (SWT)
	Will it help to reverse the national decline	Bird survey results (BTO/RSPB)

67

Headline Objective	Question	Indicator
	in farmland birds?	
	Will it protect and enhance sites, features and areas of geological value in both urban and rural areas?	Change in number and area of designated geological SSSIs and RIGs (NE)
		Reported condition of geological SSSIs and RIGs (NE)
18. To conserve and where appropriate enhance areas of historical and archaeological importance	Will it protect and enhance sites, features and areas of historical and cultural value in both urban and rural areas?	Number of listed buildings and buildings at risk (SSAG)
		Area of historic parks and gardens (SSAG)
		Number and area of Conservation Areas and Article 4 directions (SSAG)
		Number of Conservation Area Appraisals completed and enhancement schemes implemented (SSAG)
		Number of designated sites lost, or adversely affected, by development [including their settings].
		Number of buildings taken off the BAR register annually.
	Will it protect and enhance sites, features and areas of archaeological value in both urban and rural areas?	Number of Scheduled Ancient Monuments (SAMs) damaged as a result of development (SSAG)
		Planning permissions affecting known or potential archaeological sites (SSAG)
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Will it reduce the amount of derelict, degraded and underused land?	Number and percentage of new dwellings completed on previously developed land (SSAG)
		Number and percentage of existing housing commitments on previously developed land (SSAG)
		Number of vacant dwellings
	Will it improve the landscape and/or townscape?	Changes in the landscape (WI landscape survey) (SSAG)
		Number / area of town / village greens and commons
		Area of designated landscapes (AONB) (CA/DEFRA)
		Number of Countryside Stewardship / Environmental Stewardship schemes (DEFRA)
		Light pollution (CPRE)

Headline Objective	Question	Indicator
		Number of planning applications refused for reasons due to poor design

ECONOMIC OBJECTIVES

Headline Objective	Question	Indicator
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	Will it improve business development and enhance competitiveness?	Take-up of employment floorspace (SSAG)
		Employment permissions and allocations (SSAG)
		Percentage change in the total number of VAT registered businesses in the area (SDA/Suffolk Observatory)
		Change in number of businesses registered to pay business rates (SDA/Suffolk Observatory)
	Will it improve the resilience of business and the economy?	Number and percentage of employees by employment division (SSAG)
		Number and percentage of businesses by main industry type (AMR)
		Number an percentage of businesses by size (number of employees) (AMR)
	Will it promote growth in key sectors?	Number and percentage of businesses by industry type in key sectors (local authority to specify key sectors) (SSAG / AMR)
	Will it improve economic performance in advantaged and disadvantaged areas?	Comparative industrial and office rental costs within the plan area (ODPM / estate agents)
	Will it encourage rural diversification?	Employment permissions and allocations in rural areas (SSAG)
21. To revitalise town centres	Will it increase the range of employment opportunities, shops and services available in town centres?	Proportion of town centre units with A1 uses (SSAG)
	Will it decrease the number of vacant units in town centres?	Vacant units in town centres (SSAG)
22. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	Distances travelled to work for the resident population (Census).
	Will it reduce commuting?	Import/export of workers to district and/or major towns (Census).
		Employment permissions and allocations in urban areas (SSAG)
		Number / percentage of people working from home as main place of work (Census provides a baseline, and planning consents for working from home indicate trends)

Headline Objective	Question	Indicator
		Percentage of households with broadband internet connection
	Will it improve accessibility to work by public transport, walking and cycling?	Number of developments where a travel plan is submitted or is a condition of development (SSAG)
		Percentage of journeys to work undertaken by sustainable modes (SSAG)
	Will it reduce journey times between key employment areas and key transport interchanges?	May be relevant for Ipswich but not considered suitable for Suffolk as a whole.
	Will it increase the proportion of freight transported by rail or other sustainable modes?	Proportion of port freight carried by rail (Port Authorities / AMR)
	Will it increase the consumption of locally produced food and good?	Number of farmers markets and farm shops (LAs)
23. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	Number of enquiries to business advice services from within area (business link, LAs)
		Business start ups and closures (Suffolk Observatory)
	Will it encourage inward investment?	Number of enquiries to business advice services from outside of area (business link, LAs)
	Will it make land available for business development?	Employment land availability (SSAG)
		Employment permissions and allocations (SSAG)

Appendix 3: Scoped documents

International context
The Johannesburg Declaration on Sustainable Development – Commitments arising from summit. Sept 2002 (RSS)
The UN Millennium Declaration and Millennium Development Goals – Sept 2000 (RSS)
Kyoto Protocol and the UN Framework Convention on Climate Change – May 1992 (RSS)
Bern Convention on the Conservation of European Wildlife and Natural Habitats – 1979 (RSS)
Ramsar convention on Wetlands of international importance especially as waterfowl habitat – 1971 (RSS)
Bonn Convention on the Conservation of Migratory Species of Wild Animals (1979) (RSS)
European Spatial Development Perspective (May 1999)
European Directives:
Air Quality
Air Quality Framework Directive – 96/62/EC (RSS)
- The first Daughter Directive – 1999/30/EC (RSS)
- The second Daughter Directive – 2000/69/EC (RSS)
- The third Daughter Directive relating to Ozone – 2002/69/EC (RSS)
Climate Change
Directive to promote electricity from renewable energy – 2001/77/EC (RSS)
Directive for the encouragement of bio-fuels for transport – 2003/30/EC (RSS)
Water
Water Framework Directive – 2000/60/EC (RSS)
Urban Waste Water Treatment Directive – 91/271/EEC (RSS)
Water pollution caused by Nitrates from agricultural sources: Nitrates Directive – 91/676/EEC (RSS)
Bathing Water Quality Directive – 76/160/EEC (RSS)
Drinking Water Directive – 98/83/EC (RSS)
Land Use
Nature and Biodiversity
Directive 79/409/EEC on the Conservation of Wild Birds (RSS)
Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (RSS)
Waste Management

Framework Waste directive 75/442/EEC, as amended (RSS)
Directive 99/31/EC on the landfill of waste (RSS)
Packaging and packaging waste directive – 94/62/EC of 20 Dec 1994 (RSS)
A New Partnership for Cohesion – Third Report on Economic and Social Cohesion (Feb 04) and Draft New Regulations for Renewed Structural Funds (July 2004)
Aarhus Convention
EU Sixth Environmental Action Plan
National, Regional and Local Context (Generic)
Planning Policy Guidance and Planning Policy Statements
PPS1 – Creating Sustainable Communities (Feb 04)
PPG2 – Green Belts (Jan 95)
PPG3 – Housing (March 2000) (RSS)
PPG3 – Housing Update: Planning for Sustainable Communities in Rural Areas (January 2005)
PPG3 – Housing Update: Supporting the Delivery of New Housing (January 2005)
PPG4 – Industrial and Commercial Development and Small Firms (Nov 92)
PPG5 – Simplified Planning Zones (Nov 92)
PPS6 – Planning for Town Centres (March 2005)
PPS7 – Sustainable Development in Rural Areas (Aug 2004)
PPG8: Telecommunications (August 2001)
PPS9 – Biodiversity and Geological Conservation (Aug 2005)
PPG9 – Nature Conservation (Oct 94)
PPS10 – Planning for Sustainable Waste Management (July 2005)
PPG10 – Planning and Waste Management (Sept 99)
PPG11 – Regional Planning (Sept 04)
PPS11 – Regional Spatial Strategies (Sept 04)
PPS12 – Local Development Frameworks (Aug 04)
PPG13 – Transport (March 94)
PPG14 - Development on Unstable Land (April 90)
PPG15 – Planning and the Historic Environment (Sept 94)
PPG16 – Archaeology and Planning (Nov 90)
PPG17 – Planning for Open Space, Sport and Recreation (July 02) (RSS)

PPG20 – Coastal Planning (Sept 92)
PPS25 – Flood Risk
Review of PPS21: Tourism (March 2003)
PPG21 – Tourism (Nov 92)
PPS22 – Renewable Energy (Aug 04)
PPS23 – Planning and Pollution Control (2004)
PPG24 – Planning and Noise (Sept 94)
PPG25 – Development and Flood Risk (July 01)
Draft MPS 1: Planning & Minerals
NATIONAL, REGIONAL AND LOCAL CONTEXT – Cross-cutting Topics
Regional Spatial Strategy – RSS (banked version April 2004)
Urban
Urban White Paper
Towns and Cities Strategy and Action Plan, Urban Renaissance in the East of England (RSS)
Rural
Government Rural White Paper: Our Countryside – the future – a fair deal for rural England, DETR (2000) (RSS)
Rural Strategy (2004)
The Countryside and Rights of Way Act 2000
Sustainable Communities
A Better Quality of Life: a Strategy for Sustainable Development in the UK (1999), Taking it on: Developing UK Sustainable Development Strategy Together (Consultation: 2004)
The UK Government Sustainable Development Strategy - Securing the Future (March 2005)
Sustainable Communities Plan: Building for the Future (2003) (RSS)
A Sustainable Development Framework for the East of England, October 2001 (RSS)
Sustainable Communities in the East of England (2003)
Creating Sustainable Communities – In the East of England (Jan 2005)
Regional Spatial Strategy
RSS14 for the East of England SEA Scoping Report (17 September 2004)
Other Regional Strategies
An Integrated Regional Strategy for the East of England (Feb 2005)
East of England European Strategy 2004-7 (December 2004)

Towards Sustainable Construction – A Strategy for the East of England, Draft 2003 (RSS)
Transport
Aviation White Paper (Dec 2003)
The Future of Rail - White Paper (2004)
The Future of Transport : a network for 2030 - White Paper (2004)
Government/DfT 10 Year Transport Plan 2000 (RSS)
East of England Regional Transport Strategy (April 2003) (Incorporated as a chapter in RPG14) (RSS)
Suffolk County Council, Local Transport Plan 2006-2011
Suffolk Bus Strategy 2006-2011, March 2006
Community Strategies and Community Development Strategies
Altogether a better Suffolk – Suffolk's Community Strategy 2004
Waveney Community Strategy '2020 Vision' Discussion Document (April 2006)
Suffolk Structure Plan
Suffolk Structure Plan – 2001
Local Authority Plans
Babergh Local Plan (May 2003)
Forest Heath Local Development Framework Core Strategy and Development Policies Preferred Options (September 2006)
Mid Suffolk District Council Preferred Options, Core Strategy (May 2007)
St Edmundsbury Borough Local Plan (June 2006)
Suffolk Coastal Local Development Framework Core Strategy Issues and Options (February 2007)
Waveney Core Strategy – Preferred Options (June 2006)
Local Authority Corporate Plans and Strategies
Local Area Agreement: Suffolk 2005-2008
Suffolk County Council Corporate Plan 2006-8
Social – National, Regional and Local Context
Social Inclusion
Regional Social Strategy for the East of England (May 2004 but RSS scoped March 2004 version?)
Suffolk County Council Equalities Policy, April 2003
Health
Choosing Health: Making healthy choices easier (Nov 2004)

Health and Social Inclusion Strategy (EERA Health and Social Inclusion Panel) – can't find this but Regional Health Strategy Board is overseeing a project plan agreed in June 04 to produce a Regional Health Strategy – reporting to EERA via Health and social Inclusion Panel.
Social Care Annual Plan 2003-4
Healthy Futures A Regional Health Strategy for the East of England 2005-2010, May 2006
A Physical Activity Strategy for Waveney Draft, December 2005
Culture
A Better Life: The role of culture in the sustainable development of the East of England (EERA, September 2006)
A Cultural Strategy for Suffolk, March 2002
Waveney Cultural Strategy
Education
Suffolk's Strategy for Learning 2004-9: The Single Plan (March 2004)
School Organisation Plan 2006-2011 August 2006
Suffolk Children and Young People's Plan (2006-9)
School Organisation Review (December 2006)
Housing
The East of England Regional Housing Strategy 2003-2006, Regional Housing Forum (April 04) (RSS)
Regional Housing Strategy for the East of England 2005-2010 (July 2005)
Affordable Housing Study: The Provision of Affordable Housing in the East of England 1996-2021, 2003 (RSS)
East of England Affordable Housing Study Stage 2: Provision for Key Workers and Unmet Housing Need
Suffolk Supporting People Five-Year Strategy 2005-2010 (August 2005)
ODPM Circular January 2006: Planning for Gypsy and Traveller Caravan Sites
Code for Sustainable Homes
Community Safety
Suffolk Community Safety Strategy, 2001 (Draft)
Environmental – National, Regional and Local Context
Environmental Strategies
Environment, Our future: Regional Environment Strategy for the East of England, East of England Regional Assembly and East of England Environment Forum, July 2003 (RSS)
Soil
Farming and Food Strategy, Facing the Future, DEFRA, (Dec 2002)
The First Soil Action Plan for England: 2004-2006 (2004) -

Climate	
Climate Change: The UK Programme 2006	
Living with Climate Change in the East of England – summary Report supported by technical report (2003) (RSS)	
Nottingham Declaration	
Building a Greener Future: Towards Zero Carbon Development	
Air Quality	
National Air Quality Strategy for England, Wales, Scotland and Northern Ireland (Jan 2000) (RSS)	
Water	
East Suffolk Catchment Flood Management Plan	
The Broadland Rivers Catchment Abstraction Management Strategy (March 2006)	
Blyth Estuary Strategy, Preferred option consultation, September 2005	
Water resources for the future: A Strategy for Anglian Region (date ?) (RSS)	
Biodiversity and Nature Conservation	
Working with the Grain of Nature: A Biodiversity Strategy for England (2002) RSS	
Biodiversity – The UK Action Plan (1994)	
Wildlife and Countryside Act (1981, as amended) (RSS)	
Regional Biodiversity Action Plans	
Butterfly Conservation – Regional Action Plan for Anglia (2000)	
Suffolk Biodiversity Action Plan, Updated December 2004	
State of Nature – Lowlands – future landscapes for wildlife (2004) (RSS)	
Countryside Management	
Suffolk Rights of Way Improvement Plan (Draft currently in preparation)	
Woodland	
Woodland for Life: The Regional Woodland Strategy for the East of England, November 2003 (RSS)	
Minerals and Waste	
Suffolk Minerals Local Plan Adopted May 1999	
MPS1 – Planning and minerals	
Regional Waste Management Strategy (2002) (RSS)	
Suffolk Waste Local Plan (Adopted version), February 2006	
Joint Municipal Waste Management Strategy for Suffolk – Oct 2003	
Economic – National, Regional and Local Context	

Economic and Employment strategies
A Shared Vision – The Regional Economic Strategy for the East of England (Nov 2004) (RSS)
Prioritisation in the East of England, June 2003 (RSS)
Regional Emphasis Document SR2004, December 2003 (RSS)
Framework for Regional Employment and Skills Action (FRESA) (2003) (RSS)
International Business Strategy, Consultation Draft, December 2003 (RSS)
Expanding Suffolk's Horizons: 2004-7 – A New Economic Strategy for Suffolk
Suffolk Rural Action Plan, March 2006
Tourism
Regional Tourism Strategy 2000-2010
Tomorrows Tourism Today (August 04)
Sustainable Tourism Strategy for the East of England (March 2004)
Good Practice Guide on Planning for Tourism (DCLG May 2005)
Suffolk Tourism Partnership (action plan may be useful)
The Sunrise Coast, Tourism Strategy 2006
Sports
East of England Plan for Sport

Newly scoped documents for this Sustainability Appraisal

Document title and reference points	Key objectives, targets and indicators relevant to plan and SA	Implications for plan	Implications for SA
East Suffolk Catchment Flood Management Plan			
Draft Catchment objectives	- To reduce flood risk to the built, rural and natural environment. - To reduce flood related health risks and improve public awareness of flood warning and self help methods. - To optimise joint use of the floodplain and river corridor for flood risk management, nature conservation and recreation functions. - To manage flood risk so that Regional and Local Government development objectives can be achieved. - To reduce flood risk to infrastructure and important services. - To promote and protect land management practices that are beneficial for flood risk management, the rural economy and biodiversity. - To protect/enhance and restore features of nature conservation interest including Biodiversity Action Plan (BAP) species and habitats (designated and non-designated sites). - To protect, enhance and restore natural features and processes of the water environment for flood risk management, recreation and biodiversity benefit. - To protect and enhance cultural heritage features, landscape character and visual amenity. - To account for and manage the potential impacts of climate change.	Consider these objectives when assessing new development in the East Suffolk catchment area.	Take into account flood risk when assessing sustainability.
Suffolk Estuarine Flood Management Strategies			
Not available for scoping			
Alde, Ore and Deben Flood Risk Study			
Not available for scoping			
Thorpeness to Hollesley Strategy Plan			
Not available for scoping			

Document title and reference points	Key objectives, targets and indicators relevant to plan and SA	Implications for plan	Implications for SA
PPS25 – Flood Risk			
Decision-making principles	- Para 7: LDDs should set out policies for allocating sites and controlling development which avoid flood risk to people and property where possible, and manage it elsewhere. - Where climate change is expected to increase flood risk, LPAs should consider opportunities in LDDs to facilitate relocation of development to more sustainable locations - Para 8: Give priority to the use of SuDS - Ensure that all new development in flood risk areas is appropriately flood resilient and resistant, including safe access and escape routes	Consider appropriateness of SuDS at key sites/locations Environment Agency will advise on these issues; SFRA will help inform	Flood risk is a key policy consideration and SA indicator Climate change should be an SA indicator (PPS1 Annex has more detailed information)

Appendix 4: Sustainability Appraisal Tables

Objective 1: Sustainable development and sustainable communities	Policy CS1 (Sustainable development)	RSS principles	Secondary effects	Short/medium/long-term effects
1. To improve the health of the population overall	+ Having local services allows people to walk/cycle to them rather than drive	+ Aims to achieve ensure a healthy society	(CS1) (RSS) + People are generally more healthy in economically successful areas	
2. To maintain and improve levels of education and skills in the population overall	0 Unrelated	0 Unrelated		
3. To reduce crime and anti-social activity	0 Unrelated	+ Aims to create safe communities	(CS1) (RSS) + Crime is generally lower in economically successful areas	
4. To reduce poverty and social exclusion	+ Aims for a healthy economy, notably in rural areas	++ Aims to achieve a sustainable, flourishing and diverse economy		
5. To improve access to key services for all sectors of the population	++ Aims to improve accessibility to services and the achievement of quality local services	+ Aims for communities to be well served		
6. To offer everybody the opportunity for rewarding and satisfying employment	+ Aims to enable a healthy economy	++ Aims to achieve a sustainable, flourishing and diverse economy		
7. To meet the housing requirements of the whole community	+ Aims to provide sufficient housing	0 Unrelated		
8. To improve the quality of where people live and to encourage community participation	+ Aims to maintain and enhance sense of place	++ Aims for a strong society and to increase community identity and cohesion		
9. To maintain and where possible improve air quality	++ Aims for a sustainable transport system and local service provision, meaning less trips	+ Aims for sustainable travel between homes and workplaces		
10. To maintain and where possible improve water quality	+ Aims to conserve and enhance the natural environment	++ Aims to be environmentally sensitive, live within environmental limits and seek net environmental gains wherever possible		
11. To conserve soil resources and quality	+ Aims to conserve and enhance the natural environment	++ Aims to be environmentally sensitive, live within environmental limits and seek net environmental gains wherever possible		
12. To use water and mineral resources efficiently, and re-use and recycle where possible	0 Unrelated	0 Unrelated		(CS1) Building housing will use mineral resources and water during the (short term) construction phase
13. To reduce waste	0 Unrelated	0 Unrelated		
14. To reduce the effects of traffic on the environment	++ Aims for a sustainable transport system and local service provision, meaning less trips	+ Aims for sustainable travel between homes and workplaces		(CS1) Building housing will generate more heavy traffic during the (short term) construction phase
15. To reduce emissions of greenhouse gasses from energy consumption	0 Unrelated	+ Aims to assists with achievement of carbon emissions obligations		(CS1) Building housing will produce greenhouse gasses during the (short term) construction phase
16. To reduce vulnerability to flooding	+ Aims to tackle the effects of climate change	+ Aims to incorporate measures adapting to unavoidable climate change		
17. To conserve and enhance biodiversity and geodiversity	+ Aims to conserve and enhance the natural environment	++ Aims to be environmentally sensitive, live within environmental limits and seek net environmental gains wherever possible		
18. To conserve and where appropriate enhance areas of historical and archaeological importance	+ Aims to conserve and enhance the built environment	0 Unrelated		
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+ Aims to conserve and enhance the built environment	0 Unrelated		
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+ Aims to enable a healthy economy	++ Aims to achieve a sustainable, flourishing and diverse economy	(CS1) + Conservation of the natural/built environment may enhance tourism	
21. To revitalise town centres	+ Aims to achieve quality local services	0 Unrelated		
22. To encourage efficient patterns of movement in support of economic growth	++ Aims for a sustainable transport system and the provision of local services	+ Aims for sustainable travel between homes and workplaces		
23. To encourage and accommodate both indigenous and inward investment	0 Unrelated	0 Unrelated		

Objective 2: Settlement	Policy CS2 (Settlement policy)	Hierarchy based on physical size	Simpler hierarchy with other villages/ countryside treated the same	Additional level between market town and key service centre	Designate Wickham Market as a market town	Secondary effects	Short/medium/long-term effects
1. To improve the health of the population overall	+ Largely limits development to areas with key services, allowing more walking/ cycling	- Allowing housing development in areas without key services will decrease walking/ cycling opportunities	+ Largely limits development to areas with key services, allowing more walking/ cycling	+ Largely limits development to areas with key services, allowing more walking/ cycling			
2. To maintain and improve levels of education and skills in the population overall							
3. To reduce crime and anti-social activity							
4. To reduce poverty and social exclusion							
5. To improve access to key services for all sectors of the population	+ Limits development in areas without key services and links to neighbouring settlements with services	- May allow housing development in settlements with no key services	+ Limits development in areas without key services and links to neighbouring settlements with services	+ Limits development in areas without key services and links to neighbouring settlements with services			
6. To offer everybody the opportunity for rewarding and satisfying employment							
7. To meet the housing requirements of the whole community	+ Will provide housing where needed	+ Provides housing for all communities	+ Will provide housing where needed	+ Will provide housing where needed			
8. To improve the quality of where people live and to encourage community participation							
9. To maintain and where possible improve air quality	+ Limiting development in areas without key services will reduce trip creation	- May create more traffic if housing is located in settlements without key services	0/+ Limiting development in areas without key services will reduce trip creation, but may locate more development in inaccessible areas	++ As Wickham Market and the Trimleys both have train stations trip creation may be reduced by shifting development there	++ Wickham Market has a train station and the potential to reduce trip creation if development is shifted there		
10. To maintain and where possible improve water quality							
11. To conserve soil resources and quality							
12. To use water and mineral resources efficiently, and re-use and recycle where possible							
13. To reduce waste							
14. To reduce the effects of traffic on the environment	+ Limiting development in areas without key services will reduce trip creation	- May create more traffic if housing is located in settlements without key services	0/+ Limiting development in areas without key services will reduce trip creation, but may locate more development in inaccessible areas	++ As Wickham Market and the Trimleys both have train stations trip creation may be reduced by shifting development there	++ Wickham Market has a train station and the potential to reduce trip creation if development is shifted there		
15. To reduce emissions of greenhouse gasses from energy consumption							
16. To reduce vulnerability to flooding							
17. To conserve and enhance biodiversity and geodiversity							
18. To conserve and where appropriate enhance areas of historical and archaeological importance							
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+ Development in settlements is based on character		+ Development in villages is based on character	- Extra development in Wickham Market may compromise the CA and SLA	- Extra development in Wickham Market may compromise the CA and SLA		
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area							(i), (iii) + Keeping development consistent with character could increase tourism
21. To revitalise town centres							
22. To encourage efficient patterns of movement in support of economic growth	+ Limiting development in areas without key services will reduce trip creation	- May create more traffic if housing is located in settlements without key services	0/+ Limiting development in areas without key services will reduce trip creation, but may locate more development in inaccessible areas	++ As Wickham Market and the Trimleys both have train stations trip creation may be reduced by shifting development there	++ As Wickham Market and the Trimleys both have train stations trip creation may be reduced by shifting development there		
23. To encourage and accommodate both indigenous and inward investment							

Objective 3: Countryside	Policy CS3 (Development in the countryside)	Existing policy of restraint	Secondary effects	Short/medium/long-term effects
1. To improve the health of the population overall	+ Development limited to areas accessible by walking/cycling	++ Allows for development of leisure facilities and local employment which people can walk/cycle to	(CS3, existing) + People are generally more healthy in economically successful areas	
2. To maintain and improve levels of education and skills in the population overall				
3. To reduce crime and anti-social activity			(CS3, existing) + Crime is generally lower in economically successful areas	
4. To reduce poverty and social exclusion	++ Supports the rural economy and local social needs	+ Allows for development for employment		
5. To improve access to key services for all sectors of the population	+ Supports local social needs			
6. To offer everybody the opportunity for rewarding and satisfying employment	+ Supports the rural economy	+ Allows for development for employment		
7. To meet the housing requirements of the whole community	+ Accepts need for rural housing	+ Allows for housing to meet local needs		
8. To improve the quality of where people live and to encourage community participation	+ Aims to avoid visual, noise and general disturbance	+ Allows development for community facilities		
9. To maintain and where possible improve air quality	+ Development limited to areas accessible by walking/cycling/public transport, reducing trip creation	+ Allowing for local development could reduce trip creation		
10. To maintain and where possible improve water quality				
11. To conserve soil resources and quality	+ Development must meet needs of agriculture	+ Restricts development		
12. To use water and mineral resources efficiently, and re-use and recycle where possible				
13. To reduce waste				
14. To reduce the effects of traffic on the environment	+ Development limited to areas accessible by walking/cycling/public transport, reducing trip creation	+ Allowing for local development could reduce trip creation		
15. To reduce emissions of greenhouse gasses from energy consumption		+Allows for development of renewable energy projects		
16. To reduce vulnerability to flooding		+ Allows for development of coastal defence projects		
17. To conserve and enhance biodiversity and geodiversity	++ Aims to protect and enhance the environment and restrict development	+ Restricts most development in the countryside		
18. To conserve and where appropriate enhance areas of historical and archaeological importance	+ Aims to restrict development in areas of historical/cultural value and re-use existing buildings	+ Restricts most development in the countryside		
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	++ Aims to restricts based on landform and skyline and re-use existing buildings	+ Restricts most development in the countryside		
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+ Supports the rural economy	++ Allows for development for employment and tourism	(CS3, existing) + Conservation of the natural/built environment may enhance tourism	
21. To revitalise town centres				
22. To encourage efficient patterns of movement in support of economic growth	+ Development limited to areas accessible by walking/cycling/public transport, reducing trip creation			
23. To encourage and accommodate both indigenous and inward investment				

Objective 4: New housing distribution	Housing distribution				Short/medium/long-term effects
	Policy CS4 (Meeting housing requirements)	Preferred option	50/50 between IPA and Felixstowe/ the Trimleys	Split between the IPA, market towns and the Trimleys	
1. To improve the health of the population overall		+ Key services will be within walkable/cyclable distance	+ Key services will be within walkable/cyclable distance	+ Key services will be within walkable/cyclable distance	
2. To maintain and improve levels of education and skills in the population overall					
3. To reduce crime and anti-social activity					
4. To reduce poverty and social exclusion					
5. To improve access to key services for all sectors of the population		+ Key services will be available to new residents	+ Key services will be available to new residents	+ Key services will be available to new residents	
6. To offer everybody the opportunity for rewarding and satisfying employment					
7. To meet the housing requirements of the whole community	+ New housing provided	++ New housing provided in most parts of the district	- Rest of district misses out on new housing	+ New housing in key parts of district	
8. To improve the quality of where people live and to encourage community participation					
9. To maintain and where possible improve air quality	- More housing means more traffic, but locational policy targets areas with sustainable transport	-- More housing means more traffic (a concern in AQMA)	- More housing means more traffic	-- More housing means more traffic (a concern in Woodbridge AQMA)	
10. To maintain and where possible improve water quality					
11. To conserve soil resources and quality	- Likely to use greenfield sites	- Likely to use greenfield sites	- Likely to use greenfield sites	- Likely to use greenfield sites	
12. To use water and mineral resources efficiently, and re-use and recycle where possible	+ Building will be in accordance with principles of sustainable development	+ Building will be in accordance with principles of sustainable development	+ Building will be in accordance with principles of sustainable development	+ Building will be in accordance with principles of sustainable development	(All) Building housing will use mineral resources and water during the (short term) construction phase
13. To reduce waste	- More housing means more waste	- More housing means more waste	- More housing means more waste	- More housing means more waste	
14. To reduce the effects of traffic on the environment	- More housing means more traffic, but locational policy targets areas with sustainable transport	- More housing means more traffic	- More housing means more traffic	- More housing means more traffic	(All) Building housing will generate more heavy traffic during the (short term) construction phase
15. To reduce emissions of greenhouse gasses from energy consumption	- More housing means more energy consumption	- More housing means more energy consumption	- More housing means more energy consumption	- More housing means more energy consumption	(All) Building housing will produce greenhouse gasses during the (short term) construction phase
16. To reduce vulnerability to flooding		- Large areas in and around some market towns and large villages are vulnerable to flooding	- Large areas in and around Felixstowe and the Trimleys are vulnerable to flooding	- Large areas in and around some market towns are vulnerable to flooding	
17. To conserve and enhance biodiversity and geodiversity	- Wildlife sites and SSSIs in the IPA may be damaged, though less of an issue in Felixstowe	- Wildlife sites, SACs, SPAs and SSSIs in/around the IPA and market towns may be damaged	- Wildlife sites and SSSIs in the IPA may be damaged, though less of an issue in Felixstowe	-- Wildlife sites, SACs, SPAs and SSSIs in/around the IPA and market towns may be damaged	
18. To conserve and where appropriate enhance areas of historical and archaeological importance	- Archaeological sites (high density in the IPA) may be damaged	- Archaeological sites (high density throughout district) may be damaged	- Archaeological sites (high density in the IPA and around Felixstowe) may be damaged	- Archaeological sites (high density throughout district) may be damaged	
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes		-- Many areas are designated SLA, AONB or CA and may be damaged	-- Much of area is SLA/AONB and may be damaged	-- Many areas are designated SLA, AONB or CA and may be damaged	
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area					
21. To revitalise town centres		+ Development in market towns may boost their town centres	+ Large development of Felixstowe may boost its town centre	+ Development in market towns may boost their town centres	
22. To encourage efficient patterns of movement in support of economic growth		-- Possibly not enough jobs in market towns/villages for all new residents, leading to more commuting	++ Will allow for shorter commuting trips as many jobs in IPA/Felixstowe	- Possibly not enough jobs in market towns for all new residents, leading to more commuting	
23. To encourage and accommodate both indigenous and inward investment					

Objective 4: New housing distribution	Expansion in the Ipswich Policy Area				Expansion of Felixstowe			
	North East	East (Kesgrave North & Playford)	East (Kesgrave South & Martlesham)	East of the A12 at Martlesham	North-west	North and north-east	Within parishes of the Trimleys	North of the A14 at Trimley St Martin
1. To improve the health of the population overall	- May result in the loss of play space			+ Employment site nearby may mean more people walk/cycle to work				
2. To maintain and improve levels of education and skills in the population overall								
3. To reduce crime and anti-social activity						- May be noise concerns due to proximity to A14		
4. To reduce poverty and social exclusion								
5. To improve access to key services for all sectors of the population								
6. To offer everybody the opportunity for rewarding and satisfying employment				+ Large employment site nearby				
7. To meet the housing requirements of the whole community								
8. To improve the quality of where people live and to encourage community participation	- May result in the loss of play space							
9. To maintain and where possible improve air quality	- Poor public transport links may mean more trips are generated	+ Good public transport links along A1214 may reduce trip generation	- Poor public transport links may mean more trips are generated	+ Located near large employment site and has bus lane/park & ride	+ Potential for new railway station as development is near train line	- Access to rail services will be difficult		- Access to rail services will be difficult
10. To maintain and where possible improve water quality								
11. To conserve soil resources and quality	-- Will use high quality agricultural land and greenfield sites	- Will use greenfield land	- Will use greenfield land	- Will use greenfield land				
12. To use water and mineral resources efficiently, and re-use and recycle where possible								
13. To reduce waste								
14. To reduce the effects of traffic on the environment	- Poor public transport links may mean more trips are generated	+ Good public transport links along A1214 may reduce trip generation	- Poor public transport links may mean more trips are generated	+ Located near large employment site and has bus lane/park & ride	+ Potential for new railway station as development is near train line	- Access to rail services will be difficult		- Access to rail services will be difficult
15. To reduce emissions of greenhouse gasses from energy consumption								
16. To reduce vulnerability to flooding	- May result in building in flood zone between Playford and Tuddenham	- May result in building in flood zone near Playford	- May result in building in flood zone near Mill river	-- Major flooding risk near Martlesham		- North-east of town is bounded by high risk flood zone		
17. To conserve and enhance biodiversity and geodiversity	- May damage wildlife sites and habitats of protected species	-- May damage wildlife sites, SSSI and habitats of protected species	-- May damage wildlife sites, SSSI and habitats of protected species	- May damage wildlife sites and habitats of protected species	- Protected species may be affected		- Many protected species around Trimley St Martin	-- Protected species and wildlife site may be affected
18. To conserve and where appropriate enhance areas of historical and archaeological importance	- May damage many archaeological sites	- May damage archaeological sites	- May damage archaeological sites	- May damage archaeological sites	- Archaeological sites may be damaged and listed buildings may be disturbed	- Many archaeological sites to NE of town may be damaged	- Archaeological sites in the parishes may be damaged	- Archaeological sites may be damaged
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	- May damage SLA	- May damage SLA	- May damage SLA	-- May damage SLA and AONB		- May damage AONB	- AONB adjoins Trimley St Mary	
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area								
21. To revitalise town centres								
22. To encourage efficient patterns of movement in support of economic growth	- Poor public transport links may mean more trips are generated	+ Good public transport links along A1214 may reduce trip generation	- Poor public transport links may mean more trips are generated	+ Located near large employment site and has bus lane/park & ride	+ Potential for new railway station as development is near train line	- Access to rail services will be difficult		- Access to rail services will be difficult
23. To encourage and accommodate both indigenous and inward investment								

Objective 5: Meeting housing demand	Affordable housing quotas			Short/medium/long-term effects
	Policy CS5 (24%)	33%	66% in rural areas	
1. To improve the health of the population overall				
2. To maintain and improve levels of education and skills in the population overall				
3. To reduce crime and anti-social activity				
4. To reduce poverty and social exclusion	- Reduces amount of affordable housing coming onto the market compared to current policy	+ Provides affordable housing	++ Provides affordable housing, especially in the countryside where it is more of an issue	
5. To improve access to key services for all sectors of the population				
6. To offer everybody the opportunity for rewarding and satisfying employment			- May result in poorer people living further away from job opportunities	
7. To meet the housing requirements of the whole community	- Reduces amount of affordable housing coming onto the market compared to current policy	+ Provides affordable housing	++ Provides affordable housing, especially in the countryside where it is more of an issue	
8. To improve the quality of where people live and to encourage community participation				
9. To maintain and where possible improve air quality				
10. To maintain and where possible improve water quality				
11. To conserve soil resources and quality				
12. To use water and mineral resources efficiently, and re-use and recycle where possible				
13. To reduce waste				
14. To reduce the effects of traffic on the environment				
15. To reduce emissions of greenhouse gasses from energy consumption				
16. To reduce vulnerability to flooding				
17. To conserve and enhance biodiversity and geodiversity				
18. To conserve and where appropriate enhance areas of historical and archaeological importance				
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
21. To revitalise town centres				
22. To encourage efficient patterns of movement in support of economic growth				
23. To encourage and accommodate both indigenous and inward investment				

Objective 6: Economic development	Policy CS6 (Employment site hierarchy)	Existing policy	Emphasis on retaining employment land	Policy CS7 (New jobs)	Secondary effects	Short/medium/long-term effects
1. To improve the health of the population overall					(Existing, CS7) + People are generally more healthy in economically successful areas	
2. To maintain and improve levels of education and skills in the population overall						
3. To reduce crime and anti-social activity					(Existing, CS7) + Crime is generally lower in economically successful areas	
4. To reduce poverty and social exclusion		+ Aims to retain employment land locally	- May allow employment land to be lost to mixed use/other designation	+ Aims to create 8,000 new jobs		
5. To improve access to key services for all sectors of the population	- Limits establishment of new services in countryside					
6. To offer everybody the opportunity for rewarding and satisfying employment	- May limit economic development in the countryside	+ Aims to retain employment land locally	- May allow employment land to be lost to mixed use/other designation	+ Aims to create 8,000 new jobs		
7. To meet the housing requirements of the whole community		- Retains potential housing development sites in employment use				
8. To improve the quality of where people live and to encourage community participation						
9. To maintain and where possible improve air quality	+ Seeks to locate new development where housing growth will take place, reducing trip generation		++ Mixed use development encourages co-location of home and work	- New development will increase traffic		
10. To maintain and where possible improve water quality						
11. To conserve soil resources and quality		+ Retaining current employment land saves having to use greenfield sites		- Greenfield land will be lost to development		
12. To use water and mineral resources efficiently, and re-use and recycle where possible						Retaining existing employment sites saves having to develop new ones, which uses minerals in the (short term) construction phase
13. To reduce waste				- New development will increase waste		
14. To reduce the effects of traffic on the environment	+ Seeks to locate new development where housing growth will take place, reducing trip generation		++ Mixed use development encourages co-location of home and work	- New development will increase traffic		Retaining existing employment sites saves having to develop new ones, which generates traffic in the (short term) construction phase
15. To reduce emissions of greenhouse gasses from energy consumption				- New development will increase energy usage		Retaining existing employment sites saves having to develop new ones, which uses energy in the (short term) construction phase
16. To reduce vulnerability to flooding						
17. To conserve and enhance biodiversity and geodiversity		+ Retaining current employment land saves having to use new sites which may damage sites of biodiversity/geodiversity		- Several protected species live around Nacton and Ransomes Europark		
18. To conserve and where appropriate enhance areas of historical and archaeological importance		+ Retaining current employment land saves having to use new sites which may damage sites of historical/archaeological importance		- Large area of land around Nacton is classified as SMR and any development may damage it		
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes		+ Retaining current employment land saves having to use new sites which may damage landscapes or townscapes				
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	- May limit economic development in the countryside	+ Aims to retain/increase employment	- May allow employment land to be lost to mixed use/other designation	+ Aims to create 8,000 new jobs	(Existing) + Retaining current employment sites and not disturbing the environment/townscape could increase tourism	
21. To revitalise town centres	+ Town centres are recognised as employment areas	+ Aims to keep sites in employment use	- May allow employment land to be lost to mixed use/other designation			
22. To encourage efficient patterns of movement in support of economic growth	+ Seeks to locate new development where housing growth will take place, reducing trip generation		++ Mixed use development encourages co-location of home and work	- New development will increase traffic		
23. To encourage and accommodate both indigenous and inward investment	+ Land allocated for expansion and new development	++ Aims to keep all employment land unless its loss would not cause a shortfall	- May allow employment land to be lost to mixed use/other designation	+ Provides land for development		

Objective 7: Rural Economy	Policy CS8 (Economic development in the countryside)	Very restrictive policy	Continue existing approach	Approach required by government	Secondary effects	Short/medium/long-term effects
1. To improve the health of the population overall					(CS8, existing, government) + People are generally more healthy in economically successful areas	
2. To maintain and improve levels of education and skills in the population overall						
3. To reduce crime and anti-social activity					(CS8, existing, government) + Crime is generally lower in economically successful areas	
4. To reduce poverty and social exclusion	++ Aims to maximise economic potential or rural areas and secure employment locally	- May prevent development of employment sites in rural areas	+ Allows for employment site development in rural areas			
5. To improve access to key services for all sectors of the population						
6. To offer everybody the opportunity for rewarding and satisfying employment	++ Aims to maximise economic potential or rural areas and secure employment locally	- May prevent development of employment sites in rural areas	+ Allows for employment site development in rural areas	0 Does not aim to maximise employment opportunities		
7. To meet the housing requirements of the whole community						
8. To improve the quality of where people live and to encourage community participation						
9. To maintain and where possible improve air quality	+ Will only offer support for development with no adverse impact on the natural environment	+ Does not allow development in non-sustainable locations		+ Aims to avoid generating traffic		
10. To maintain and where possible improve water quality	+ Will only offer support for development with no adverse impact on the natural environment					
11. To conserve soil resources and quality	+ Will only offer support for development with no adverse impact on the natural environment	++ Does not allow land required for agriculture to be lost	+ Aims for retention of most land	++ Aims to make best use of brownfield sites and only have small scale development		
12. To use water and mineral resources efficiently, and re-use and recycle where possible						Retaining existing employment sites saves having to develop new ones, which uses minerals in the (short term) construction phase
13. To reduce waste						
14. To reduce the effects of traffic on the environment	+ Will only offer support for development with no adverse impact on the natural environment	+ Does not allow development in non-sustainable locations	0 Only allows for development already present	+ Aims to avoid generating traffic		Retaining existing employment sites saves having to develop new ones, which generates traffic in the (short term) construction phase
15. To reduce emissions of greenhouse gasses from energy consumption						Retaining existing employment sites saves having to develop new ones, which uses energy in the (short term) construction phase
16. To reduce vulnerability to flooding						
17. To conserve and enhance biodiversity and geodiversity	+ Will only offer support for development with no adverse impact on the natural environment	++ Restricting development conserves bio/geodiversity	-/0 Development may damage bio/geodiversity, but can be mitigated	+ Takes into account nature conservation		
18. To conserve and where appropriate enhance areas of historical and archaeological importance	+ Will only offer support for development with no adverse impact on the built environment	++ Restricting development conserves areas of historical and archaeological importance	-/0 Development may damage areas of historical and archaeological importance, but can be mitigated	+ Takes into account historic interest		
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+ Will only offer support for development with no adverse impact on the built environment	+ Restricting development conserves landscapes and townscapes	-/0 Development may damage landscapes/townscapes, but can be mitigated	++ Aims to use existing buildings and retain redundant ones of proven value, and takes into account landscape impact		
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	++ Aims to maximise economic potential or rural areas and secure employment locally	-/0 May prevent non-agricultural economic growth in rural areas	+ Allows for other economic growth in rural areas	+ Aims to diversify the rural economy, making it less vulnerable	(CS8, existing, government) + Restricting development and not disturbing the environment/townscape could increase tourism	
21. To revitalise town centres						
22. To encourage efficient patterns of movement in support of economic growth		+ Does not allow development in non-sustainable locations	0 Only allows for development already present	+ Aims to avoid generating traffic		
23. To encourage and accommodate both indigenous and inward investment			+ Allows for provision of non-agricultural employment land			

Objective 8: Tourism	Policy CS9 (Tourism)	Continue existing policy	Apply a discerning policy	Secondary effects	Short/medium/long-term effects
1. To improve the health of the population overall				(Existing, discerning) + People are generally more healthy in economically successful areas and may provide more facilities for local people	
2. To maintain and improve levels of education and skills in the population overall					
3. To reduce crime and anti-social activity				(Existing, discerning) + Crime is generally lower in economically successful areas	
4. To reduce poverty and social exclusion		0/+ Encourages small-scale developments	0/+ Encourages small-scale developments		
5. To improve access to key services for all sectors of the population				+/- Tourists may help support key local services, but second home ownership may reduce customer base	
6. To offer everybody the opportunity for rewarding and satisfying employment	0/+ Allows for growth in most areas	0/+ Encourages small-scale developments	0/+ Encourages small-scale developments		
7. To meet the housing requirements of the whole community				- Increased tourism may encourage second home ownership, reducing housing availability for locals	
8. To improve the quality of where people live and to encourage community participation					
9. To maintain and where possible improve air quality	+/- Supports the introduction of local management solutions for problems created by tourism, but more tourism will generate more traffic	+Assesses proposals against environmental impact	- May be more traffic in some areas if more development is allowed		
10. To maintain and where possible improve water quality					
11. To conserve soil resources and quality	- Likely to use greenfield sites				
12. To use water and mineral resources efficiently, and re-use and recycle where possible					
13. To reduce waste					
14. To reduce the effects of traffic on the environment	+/- Supports the introduction of local management solutions for problems created by tourism, but more tourism will generate more traffic	+Assesses proposals against environmental impact	- May be more traffic in some areas if more development is allowed		
15. To reduce emissions of greenhouse gasses from energy consumption		+Assesses proposals against environmental impact	0 No specific reference to preserving the environment		
16. To reduce vulnerability to flooding					
17. To conserve and enhance biodiversity and geodiversity		+Assesses proposals against environmental impact	0 No specific reference to preserving the environment		
18. To conserve and where appropriate enhance areas of historical and archaeological importance					
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+ Aims to protect the AONB	+ Generally resists large scale development in the AONB	0 No specific reference to protecting the AONB		
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	0/+ Allows for growth in most areas	0/+ Encourages small-scale developments	0/+ Encourages small-scale developments		
21. To revitalise town centres	+ Most market towns have capacity to absorb development				
22. To encourage efficient patterns of movement in support of economic growth	+/- Supports the introduction of local management solutions for problems created by tourism, but more tourism will generate more traffic				
23. To encourage and accommodate both indigenous and inward investment					

Objective 9: Retail Centres	Policy CS10 (Retail floorspace)	Policy CS11 (Retail hierarchy)	Expanded Ipswich Policy Area	Secondary effects	Short/medium/long-term effects
1. To improve the health of the population overall		+ By aiming to provide convenience shopping to vast majority of population, may increase walking/cycling to shops	+ May encourage development near residential areas	(CS10, CS11) + People are generally more healthy in economically successful areas	
2. To maintain and improve levels of education and skills in the population overall					
3. To reduce crime and anti-social activity				(CS10, CS11) + Crime is generally lower in economically successful areas	
4. To reduce poverty and social exclusion	+ Aims to provide new floorspace				
5. To improve access to key services for all sectors of the population		+ Aims to provide convenience shopping to vast majority of population	- Enlarging out-of-town developments around Ipswich may reduce the amount of people using local services		
6. To offer everybody the opportunity for rewarding and satisfying employment	+ Aims to provide new floorspace	+ By aiming to provide convenience shopping to vast majority of population, employment opportunities will be available in many settlements.	+ May provide local services		
7. To meet the housing requirements of the whole community					
8. To improve the quality of where people live and to encourage community participation					
9. To maintain and where possible improve air quality		+ By aiming to provide convenience shopping to vast majority of population, may reduce the need to travel	- May encourage people to drive to out-of-town retail developments around Ipswich		
10. To maintain and where possible improve water quality					
11. To conserve soil resources and quality					
12. To use water and mineral resources efficiently, and re-use and recycle where possible					New development will use minerals during the (short term) construction phase
13. To reduce waste					
14. To reduce the effects of traffic on the environment		+ By aiming to provide convenience shopping to vast majority of population, may reduce the need to travel	+ May encourage development near residential areas		New development will generate traffic during the (short term) construction phase
15. To reduce emissions of greenhouse gasses from energy consumption					New development will use energy during the (short term) construction phase
16. To reduce vulnerability to flooding					
17. To conserve and enhance biodiversity and geodiversity					
18. To conserve and where appropriate enhance areas of historical and archaeological importance					
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes					
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+ Aims to provide new floorspace	+ Aims to sustain and enhance the vitality and viability of town centres			
21. To revitalise town centres	+ Aims to provide new floorspace	+ Aims to sustain and enhance the vitality and viability of town centres	- Extra development of large out-of-town stores may damage local town centres		
22. To encourage efficient patterns of movement in support of economic growth		+ By aiming to provide convenience shopping to vast majority of population, may reduce the need to travel	+ May encourage development near residential areas		
23. To encourage and accommodate both indigenous and inward investment	+ Aims to provide new floorspace				

Objective 10: Transport	Policy CS12 (Travel)	Policy CS13 (Connectivity)	Short/medium/long-term effects
1. To improve the health of the population overall	+ Aims to locate new development in areas where the need to travel is minimised		
2. To maintain and improve levels of education and skills in the population overall			
3. To reduce crime and anti-social activity			
4. To reduce poverty and social exclusion	+ Aims to ensure new development is located where range of modes are available However, recognises need for cars in rural areas and encourages use by providing car parking		
5. To improve access to key services for all sectors of the population	+ Aims to locate new development in areas where the need to travel is minimised		
6. To offer everybody the opportunity for rewarding and satisfying employment		+ Improving connectivity could lead to better access to job opportunities	
7. To meet the housing requirements of the whole community			
8. To improve the quality of where people live and to encourage community participation			
9. To maintain and where possible improve air quality	+ Aims to locate new development in areas where the need to travel is minimised and where realistic alternatives are available. However, recognises need for cars in rural areas and encourages use by providing car parking	+/- Aims to improve connectivity of public transport, but may encourage use of air travel and out-commuting	
10. To maintain and where possible improve water quality			
11. To conserve soil resources and quality			
12. To use water and mineral resources efficiently, and re-use and recycle where possible			
13. To reduce waste			
14. To reduce the effects of traffic on the environment	+ Aims to locate new development in areas where the need to travel is minimised and where realistic alternatives are available. . However, recognises need for cars in rural areas and encourages use by providing car parking	+/- Aims to improve connectivity of public transport, but may encourage use of air travel and commuting	
15. To reduce emissions of greenhouse gasses from energy consumption			
16. To reduce vulnerability to flooding			
17. To conserve and enhance biodiversity and geodiversity			
18. To conserve and where appropriate enhance areas of historical and archaeological importance			
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes			
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area			
21. To revitalise town centres			
22. To encourage efficient patterns of movement in support of economic growth	+ Aims to locate new development in areas where the need to travel is minimised and where realistic alternatives are available. However, recognises need for cars in rural areas and encourages use by providing car parking	+/- Aims to improve connectivity of public transport, but may encourage use of air travel	
23. To encourage and accommodate both indigenous and inward investment		+ Improving connectivity may encourage inward investment	

Objective 11: Protecting and enhancing the physical environment	Policy CS14 (Biodiversity)	Policy CS15 (Landscape)	Special Landscape Area			Policy CS16 (Design)	Secondary effects	Short/medium/ long-term effects
			Retain	Expand	Reduce			
1. To improve the health of the population overall	+ Aims to increase public access to biodiversity sites where appropriate					+ Aims to provide a safe environment	(CS15, CS16) + People are generally more healthy in economically successful areas	
2. To maintain and improve levels of education and skills in the population overall								
3. To reduce crime and anti-social activity							(CS15, CS16) + Crime is generally lower in economically successful areas	
4. To reduce poverty and social exclusion				+/- May be more difficult to designate new employment sites, but preserving more landscape may increase tourism	+/- May be more easier to designate new employment sites, but preserving less landscape may decrease tourism potential			
5. To improve access to key services for all sectors of the population								
6. To offer everybody the opportunity for rewarding and satisfying employment	+ Protecting biodiversity sites may increase tourism	+/- Protecting and enhancing local landscape and promoting their distinctiveness could increase tourism, but could prevent economic development	0 No change	+/- May be more difficult to designate new employment sites, but preserving more landscape may increase tourism	+/- May be more easier to designate new employment sites, but preserving less landscape may decrease tourism potential	+ Providing an attractive environment may increase tourism		
7. To meet the housing requirements of the whole community		- May prevent rural needs housing being built		- May be more difficult to designate new housing sites	+ May be easier to designate new housing sites			
8. To improve the quality of where people live and to encourage community participation	+ Aims to increase public access to biodiversity sites where appropriate					++ Aims to provide high quality design		
9. To maintain and where possible improve air quality						+ Aims to provide accessible development		
10. To maintain and where possible improve water quality	++ Major rivers (biodiversity sites) will be protected							
11. To conserve soil resources and quality		+ May prevent greenfield land being used		+ May prevent greenfield land being used	- May lead to more greenfield land being used			
12. To use water and mineral resources efficiently, and re-use and recycle where possible						+ Aims for sustainable construction methods		
13. To reduce waste								
14. To reduce the effects of traffic on the environment						+ Aims to provide accessible development		
15. To reduce emissions of greenhouse gasses from energy consumption						+ Aims for energy efficiency		
16. To reduce vulnerability to flooding								
17. To conserve and enhance biodiversity and geodiversity	++ Protects biodiversity sites							
18. To conserve and where appropriate enhance areas of historical and archaeological importance						++ Aims to respect context of existing surroundings		
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes		++ Aims to protect and enhance local landscape and promote their distinctiveness	0 No change	++ More landscape protected	-- Less landscape protected	++ Aims to provide an attractive environment and respect the local vernacular		
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+ Protecting biodiversity sites may increase tourism	+/- Protecting and enhancing local landscape and promoting their distinctiveness could increase tourism, but could prevent economic development	0 No change	+/- May be more difficult to designate new employment sites, but preserving more landscape may increase tourism	+/- May be more easier to designate new employment sites, but preserving less landscape may decrease tourism potential	+ Providing an attractive environment may increase tourism		
21. To revitalise town centres								
22. To encourage efficient patterns of movement in support of economic growth						+ Aims to provide accessible environment		
23. To encourage and accommodate both indigenous and inward investment				- May be more difficult to designate new employment sites	+ May be easier to designate new employment sites	+ Aims to provide attractive environment		

Objective 12: Climate change	Policy CS17 (Construction)	Policy CS18 (Renewable energy)	Policy CS19 (Nuclear power)	Policy CS20 (Environmental risk)	Development in flood zone 3		Short/medium/ long-term effects
					No development	Some allowed	
1. To improve the health of the population overall	+ Aims to minimise air, noise and light pollution, all detrimental to physical and mental health		- Potential threat to health in event of problem or anxiety		- Would seriously constrain growth at Port of Felixstowe	+ May allow growth at Port of Felixstowe	
2. To maintain and improve levels of education and skills in the population overall							
3. To reduce crime and anti-social activity			+ Social issues associated with housing construction workers in area		- Would seriously constrain growth at Port of Felixstowe	+ May allow growth at Port of Felixstowe	
4. To reduce poverty and social exclusion			++ Considers economic impact and aims to ensure that the benefits are enjoyed by local communities	- May reduce the potential amount of employment land	- May constrain potential housing sites	+ May allow some more housing sites to be developed	
5. To improve access to key services for all sectors of the population							
6. To offer everybody the opportunity for rewarding and satisfying employment		+ Renewable energy development could provide construction jobs	++ Considers economic impact and aims to ensure that the benefits are enjoyed by local communities	- May reduce the potential amount of employment land			(CS18) Construction jobs are temporary compared to lifespan of developments
7. To meet the housing requirements of the whole community			++ Considers housing need, both during construction and in the long-term	- May reduce area of land on which housing may be built	+ Would prevent development near most of the district's rivers/streams		
8. To improve the quality of where people live and to encourage community participation			+ Considers community impact				
9. To maintain and where possible improve air quality	+ Aims to minimise air pollution		++ Takes into account ecological impacts and aims to consider rail/sea transport				
10. To maintain and where possible improve water quality			+ Takes into account ecological impacts				
11. To conserve soil resources and quality			- Likely to use greenfield site				
12. To use water and mineral resources efficiently, and re-use and recycle where possible	++ Aims to ensure prudent use of natural resources and utilise sustainable construction methods		+ Aims for sustainable procurement in construction				
13. To reduce waste	++ Aims to minimise waste and provide for recycling		-- On-site storage of nuclear waste				
14. To reduce the effects of traffic on the environment			+ Aims to consider rail/sea transport				(CS19) Construction traffic is temporary compared to lifespan of nuclear plant
15. To reduce emissions of greenhouse gasses from energy consumption	++ Aims to reduce levels of energy consumption and emission of greenhouse gasses	+ Aims to generally support renewable energy facilities					(CS19) Significant amount of energy is used in construction
16. To reduce vulnerability to flooding			+ Takes into account coastal erosion	++ Considers flooding and coastal erosion in new development	++ Minimises flood risk by not accepting development	+ Restricts development in flood zone	
17. To conserve and enhance biodiversity and geodiversity	+ Aims to minimise light pollution	+ Aims to take into account impact on nature of renewable energy developments	+ Takes into account ecological impacts		-- Would seriously constrain growth at Port of Felixstowe	+ May allow growth at Port of Felixstowe	
18. To conserve and where appropriate enhance areas of historical and archaeological importance		+ Aims to take into account impact on heritage or renewable energy developments					
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes		+ Aims to take into account impact on landscape of renewable energy developments	+ Takes into account landscape issues				
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area		+ Supports a growth sector	++ Considers economic impact and aims to ensure that the benefits are enjoyed by local communities	- May reduce the potential amount of employment land by restricting new development in areas of risk	-- Would seriously constrain growth at Port of Felixstowe	+ May allow growth at Port of Felixstowe	
21. To revitalise town centres					- Would seriously constrain growth at Port of Felixstowe	+ May allow growth at Port of Felixstowe	
22. To encourage efficient patterns of movement in support of economic growth			+ Aims to consider rail/sea transport				
23. To encourage and accommodate both indigenous and inward investment				- May reduce the potential amount of employment land	- Would seriously constrain growth at Port of Felixstowe	+ May allow growth at Port of Felixstowe	

Objective 13: Physical and community infrastructure	Policy CS21 (Infrastructure)	Short/medium/ long-term effects
1. To improve the health of the population overall	+ Seeks to meet community infrastructure needs, including health facilities	
2. To maintain and improve levels of education and skills in the population overall	+ Seeks to meet community infrastructure needs possibly including schools	
3. To reduce crime and anti-social activity	+ Seeks to meet community infrastructure needs, including social facilities	
4. To reduce poverty and social exclusion	+ Seeks to meet community infrastructure needs, including social facilities	
5. To improve access to key services for all sectors of the population	++ Seeks to meet community infrastructure needs, including schools	
6. To offer everybody the opportunity for rewarding and satisfying employment	+ Provision of services will provide a range of jobs	
7. To meet the housing requirements of the whole community		
8. To improve the quality of where people live and to encourage community participation	+ Seeks to meet community infrastructure needs	
9. To maintain and where possible improve air quality	+ Provision of community facilities will reduce the need to travel	
10. To maintain and where possible improve water quality		
11. To conserve soil resources and quality		
12. To use water and mineral resources efficiently, and re-use and recycle where possible		Building community infrastructure will use mineral resources in the (short term) construction phase
13. To reduce waste		
14. To reduce the effects of traffic on the environment	+ Provision of community facilities will reduce the need to travel	Building community infrastructure will generate traffic in the (short term) construction phase
15. To reduce emissions of greenhouse gasses from energy consumption		Building community infrastructure will use energy in the (short term) construction phase
16. To reduce vulnerability to flooding		
17. To conserve and enhance biodiversity and geodiversity		
18. To conserve and where appropriate enhance areas of historical and archaeological importance		
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes		
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+ Could help provide local jobs	
21. To revitalise town centres		
22. To encourage efficient patterns of movement in support of economic growth	+ Could help provide local jobs	
23. To encourage and accommodate both indigenous and inward investment		

Objective 14: Local services	Policy CS22 (Local services)	Short/medium/long-term effects
1. To improve the health of the population overall	+ Providing services locally means that people can walk/cycle to them	
2. To maintain and improve levels of education and skills in the population overall		
3. To reduce crime and anti-social activity		
4. To reduce poverty and social exclusion	+ Provision of new services can help younger and older people	
5. To improve access to key services for all sectors of the population	++ Aims to protect or enhance local services or support proposals for new services	
6. To offer everybody the opportunity for rewarding and satisfying employment	+ Aims to retain services; range of local employment opportunities	
7. To meet the housing requirements of the whole community		
8. To improve the quality of where people live and to encourage community participation	+ Aims to protect community assets	
9. To maintain and where possible improve air quality	+ Providing services locally means that people can walk/cycle to them	
10. To maintain and where possible improve water quality		
11. To conserve soil resources and quality		
12. To use water and mineral resources efficiently, and re-use and recycle where possible		
13. To reduce waste		
14. To reduce the effects of traffic on the environment	+ Providing services locally means that people can walk/cycle to them	
15. To reduce emissions of greenhouse gasses from energy consumption		
16. To reduce vulnerability to flooding		
17. To conserve and enhance biodiversity and geodiversity		
18. To conserve and where appropriate enhance areas of historical and archaeological importance		
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes		
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+ Aims to retain services; range of local employment opportunities	
21. To revitalise town centres		
22. To encourage efficient patterns of movement in support of economic growth	+ Providing services locally means that people can walk/cycle to them	
23. To encourage and accommodate both indigenous and inward investment		

Objective 15: Leisure	Policy CS23 (Sport and play)	Policy CS24 (Green space)	Short/medium/long-term effects
1. To improve the health of the population overall	++ Aims to provide sport and play space	+ Aims to provide greater access to green space	
2. To maintain and improve levels of education and skills in the population overall		+ Access to sites aims to improve understanding of ecology	
3. To reduce crime and anti-social activity	+ Provision of activities could reduce anti-social activities		
4. To reduce poverty and social exclusion		+ Aims to promote access to benefit community cohesion	
5. To improve access to key services for all sectors of the population			
6. To offer everybody the opportunity for rewarding and satisfying employment			
7. To meet the housing requirements of the whole community			
8. To improve the quality of where people live and to encourage community participation	+ Aims to provide sport and play space	+ Aims to provide greater access to green space and may benefit community cohesion	
9. To maintain and where possible improve air quality	+ Local facilities will reduce the need to travel		
10. To maintain and where possible improve water quality			
11. To conserve soil resources and quality			
12. To use water and mineral resources efficiently, and re-use and recycle where possible			Creating facilities will use mineral resources in the (short term) construction phase
13. To reduce waste			
14. To reduce the effects of traffic on the environment	+ Local facilities will reduce the need to travel		Creating facilities will generate traffic in the (short term) construction phase
15. To reduce emissions of greenhouse gasses from energy consumption			Creating facilities will use energy in the (short term) construction phase
16. To reduce vulnerability to flooding			
17. To conserve and enhance biodiversity and geodiversity		+ Aims to protect wildlife	
18. To conserve and where appropriate enhance areas of historical and archaeological importance			
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes		+ Aims to protect landscape character	
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area			
21. To revitalise town centres			
22. To encourage efficient patterns of movement in support of economic growth	+ Local facilities will reduce the need to travel		
23. To encourage and accommodate both indigenous and inward investment			