

Suffolk Coastal District Local Plan - Core Strategy and Development Management Policies 2010 – 2027

ADOPTION STATEMENT (prepared under Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004)

1. Introduction

1.1 Context

The Suffolk Coastal Core Strategy and Development Management Policies document has been prepared under the Planning and Compulsory Purchase Act 2004 (the 2004 Act') and will form the statutory development plan for Suffolk Coastal District. When work commenced on the plan, the 2004 Act required it to be in general conformity with the adopted East of England Plan, the regional spatial strategy for the area. In order to localise the planning system, section 109 of the Localism Act provided for the abolition of the regional planning tier. The East of England Plan was abolished on 3 January 2013.

In developing local plans, local planning authorities must have regard to national policies and advice contained in guidance issued by the Secretary of State for Communities and Local Government:

- The National Planning Policy Framework (NPPF) was published in March 2012. This sets out the Government's planning policies for England and provides a framework within which local communities can produce their own distinctive local and neighbourhood plans reflective of the needs and priorities of their communities. Local planning authorities will continue to determine the quantum and location of development, albeit without the additional tier of regional direction. It includes Government's expectation for planning strategically across local boundaries and within that role of the planning system in protecting the environment.
- Planning Policy for Traveller Sites, published in March 2012 by the Department for Communities and Local Government (DCLG).
- Planning Policy Statement 10: Planning for Sustainable Waste Management (PPS10), until it is replaced with the national waste planning policy to be published as part of the National Waste Management Plan for England.

In addition, local councils need to comply with existing national and European legislation in preparing their plans and the duty to co-operate, introduced in section 33A of the Planning and Compulsory Purchase Act 2004 with effect from 15th November 2011, in order for their plan to be found sound at examination.

Local authorities must also carry out a sustainability appraisal under section 19 the Planning and Compulsory Purchase Act 2004, which also comprises the Strategic Environmental Assessment (SEA) required by European Directive 2001/42/EC and implementing regulations in England and Wales.

Sustainability appraisals of the Suffolk Coastal Core Strategy were prepared over the period 2006 to 2013 in relation to its various iterations of the draft Core Strategy.

1.2 Purpose of the Post Adoption Statement

Suffolk Coastal District Council adopted the Suffolk Coastal Core Strategy and Development Management Policies Development Plan Document 2010 – 2027 (the 'Core Strategy') on 5th July 2013. In accordance with Article 9 of the Strategic Environmental Assessment Directive 2001, Regulation 36 of the Town and Country Planning (Local Development) (England) Regulations 2004 and Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004, the District Council has prepared this statement that sets out:

- How environmental and sustainability considerations have been integrated into the Core Strategy
- How the environmental reports (sustainability appraisals) have been taken into account
- How opinions expressed during the consultation on the draft plan and environmental reports have been taken into account within the plan as adopted
- The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives considered
- Measures that are to be taken to monitor the significant environmental effects of the implementation of the plan.

The purpose of this Post Adoption Statement is to provide specific information outlined under each of the points listed above and which is presented in the following sections of this statement.

2. How environmental and sustainability considerations have been integrated into the Core Strategy

2.1 Environmental and sustainability considerations in the Core Strategy

Environmental considerations are integral to the Core Strategy reflecting statutory requirements for their consideration in the plan making process, in its production, implementation and effectiveness. The NPPF makes clear that the planning system should contribute to and enhance the natural environment, including the protection and enhancement of valued landscapes, minimising impacts on biodiversity and providing net gains in biodiversity where ever possible. The NPPF underlines that pursuing sustainable development means moving from a net loss of biodiversity to achieving net gains in the future.

Suffolk Coastal's Core Strategy's overarching vision includes caring for the environment with strategic objectives on sustainability (objective 1), climate change (objective 9), the coast (objective 10), protecting and enhancing the physical environment (objective 11) and green infrastructure (objective 14). Strategic policies (in particular SP1, SP1A, SP12, SP14, SP15, SP17) articulate in detail what the Council wishes to achieve under these headings, taking into account plans of other agencies for example water companies and their respective Water Resource management plans, Shoreline Management Plans, Suffolk Coast and Heaths Area of Outstanding Natural Beauty Management Strategy, and the Suffolk Biodiversity Action Plan.

The Council has included the presumption in favour of sustainable development, the 'golden thread' at the heart of the NPPF by adding the national model policy (SP1A) to the Core Strategy as a modification. The sustainability appraisal of this addition confirms that this will have a positive impact as the wording emphasises finding solutions so proposed development can be approved and without delay if they accord with the policies in the plan or if adverse effects do not outweigh the benefits when assessed against the policies in the NPPF.

2.2 Environmental and sustainability considerations in the Sustainability Appraisals

The purpose of sustainability appraisal (which incorporates SEA) is to evaluate the likely environmental, social and economic implications of proposals and how these contribute to sustainable development. Sustainability appraisals of the Suffolk Coastal Core Strategy and Development Management policies were prepared over the period 2006 to 2013 in relation to the various iterations of the draft Core Strategy. These have informed the decisions taken at various stages of the plan process and the choices made between alternative options, which together have informed the decision to submit the plan for examination. The various iterations of the SA/SEA have also assisted with and informed the changes made during the Examination process.

The process of sustainability appraisal commenced in 2006 with the compilation of an evidence base and a scoping consultation with the statutory consultees (Environment Agency, Natural England's two predecessor bodies and English Heritage). Due to the length of time taken to prepare the plan the baseline was updated for subsequent iterations of the plan and appraisals in 2007, 2010 and 2011 although no major new issues were identified from this work requiring change to the Sustainability Appraisal Framework. For example, geodiversity was added to the SA framework following consultation comments from Natural England in 2007. The Environment Agency and English Heritage were specifically consulted in 2011, assisting with the updating of the baseline and analysis prior to the publication of the November 2011 SA for consultation with the Pre-submission Core Strategy.

Key environmental, social and economic considerations identified from the work on the baseline analysis included:

- The District has significant areas of national and internationally designated areas for birds (Special Protection areas and RAMSAR sites) and Sites of Special Scientific Interest with a number of Biodiversity Action Plans and Habitat Action plans in place to conserve nationally and local important habitats and species. Recent local studies suggest current use can result in disturbance to Nightjars in the Sandlings SPA.
- There is a particularly rich historic environment and internationally important Anglo Saxon archaeological site and potential for more archaeological finds.
- Large parts of Suffolk Coastal are designated as Areas of Outstanding Natural Beauty. Light pollution has increased between 1993 and 2000. There is a deficiency of 20ha of formal green infrastructure in the Felixstowe area.

- 12,000 properties are at risk of flooding from rivers or the sea in Suffolk and a substantial part of the coastline and rivers are in Suffolk Coastal and are at risk of flooding.
- There are 2 air quality management areas in Suffolk Coastal linked to transport emissions.
- 54% of rivers have poor or bad ecological status and the groundwater chemical class for Suffolk Coastal is poor throughout, although the groundwater quantity class was assessed as good in 2009.
- There are water supply and foul drainage infrastructure issues in Felixstowe, East Ipswich and Leiston.
- High car dependency puts strains on transport infrastructure particularly on the A14 and Orwell Bridge, with the Port of Felixstowe contributing to increasing HGV traffic.
- The income to house price ratio is higher than the Suffolk average making Suffolk Coastal one of the least affordable Districts in the County.
- The health of people in Suffolk Coastal is generally better than the East of England average.
- Suffolk Coastal is the second least deprived area in Suffolk although there are some pockets in its rural areas that are in the worst 10-20% of Lower Super Output Areas in East of England.
- It has an ageing population profile with deaths exceeding births, and growth coming from in-migration.
- Numbers of jobs available in the District and employed residents have fallen in the 2 years to 2011.
- Only 33% of the rural population live in settlements with a food shop, post office, pub, primary school and meeting place. 42% live within 13 minutes walk of an hourly bus service.
- Business formation rates are lower than the Suffolk average.
- High proportions of jobs in Suffolk Coastal are in distribution and transport and public services.

These factors were then reflected in the range of topics included in the SA framework. The objectives for the core strategy, against which the developing policies were to be assessed, are shown in Table 1.

Table 1: 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 townscape
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

At each major stage of development of the plan (Issues and Options, Preferred Options, Updated Preferred Options, Reviewed Core Strategy, Modifications following public enquiry) the sustainability appraisal has tested the Core Strategy against the 23 sustainability objectives. The Core Strategy policies and alternatives have been tested to determine their potential to give rise to significant effects, by identifying the likely changes to the baseline conditions as a result of implementing the proposed policy or reasonable alternative. These changes are described in terms of their geographical scale, timescale over which they could occur, whether the effects would be temporary or permanent, positive or negative, or likely or unlikely. Where numerical information was not available, the assessment was based on professional judgement and with reference to relevant legislation, regulations and policy. Consideration was also given to ways of mitigating adverse effects and maximising beneficial effects. In the same way strategic housing sites (which have been the most debated issue during the development of the Core Strategy) have been systematically compared using area specific interpretation of the sustainability appraisal objectives to test their suitability for 1,000 and 2,000 houses. As part of the iterative process of developing the Core Strategy, recommendations and amendments have been made by the sustainability appraisal at various stages and incorporated into the Core Strategy as it has developed. This has assisted choices between policy options, choices between strategic housing sites and improved policy wording to strengthen or maximise sustainable development or additions to supporting text to clarify the scope of policies.

This has particularly been the case with SP20 Ipswich Policy Area (and also SP21 and DM27) where wording has been added as a result of the sustainability appraisal and related Appropriate Assessment to specify the nature of mitigating features that will need to be included to protect the sensitive estuary environment from the proposed scale of housing development. At the Issues and Options and Preferred Options stages, the SA highlighted concerns about biodiversity sensitivity in relation to housing in the East Ipswich Plan Area. These were identified in more detail in the appraisal of the area options and examined in the subsequent Appropriate Assessment. The latter involved detailed modelling of potential impacts and was able to suggest appropriate mitigation measures to manage potential biodiversity impacts which were then included in subsequent SA reports.

3. How the environmental reports (sustainability appraisals) have been taken into account

At each stage when an environmental report (sustainability appraisal) document has been prepared, it has been scrutinised by the Council and changes made to the plan where thought appropriate. Changes made have been subsequently

reassessed in the next iteration of the plan and in this way the SA has progressively assessed updates to the plan resulting from changing statutory requirements, decisions made following public consultation on the plan and the SA, and as agreed by the Council due to the conclusions of the SA itself. Any outstanding conclusions of previous SA work have been subsequently reconsidered in the light of a revised plan and any conclusions remaining relevant have been carried forward. Hence at this Adoption stage it is appropriate to note how the final SA of the Pre- submission Core Strategy and Development Management Policies (2011) and the addendum (2013) updating this in the light of the Modifications agreed to the plan following the Public Inquiry and as requested by the Inspector, have been taken into account.

Table 2 sets out the suggested proposals to mitigate issues emerging from the SA of the Pre- submission Core Strategy and Development Management Policies (2011) and the Council's response and Table 2 deals with the recommendations in the addendum that considered the impact of the modifications to the Core Strategy post the public inquiry.

Table 2: Mitigation proposals made in SA (2011) and Suffolk Coastal's Response (summarised from the SA Addendum 2013)

SA proposal	SCDC response
Core Strategy	(References are all to page numbers in SA Addendum 2013)
Clarify in SP1 that Suffolk Coastal's archaeological asset will be protected and enhanced. Also consider preparing a Strategic Planning Document to encourage early identification of historical asset (including buildings that might need to be Listed, early identification of archaeology), rescue archaeology and integration of revealed archaeological asset into the design or landscaping of buildings.	The supporting text to SP15 <i>Landscape and Townscape</i> recognises the importance of archaeology and scheduled ancient monuments and that their protection can be addressed outside the Local Development Framework and through the rigorous application of the NPPF. Decisions on development proposals affecting heritage assets will be informed as appropriate by archaeological assessments and information from the historic environment record. (p18)
In terms of sustainability it may be better for housing allocations to go to Leiston if a further nuclear development takes place and the High School for the area is located in the town, provided sites that respect the nuclear safeguarding can be found.	The uncertainty concerning the Middle School at Saxmundham has now been resolved and a Free School established. The strategy for Saxmundham allows for development for local needs that might now be higher and the policy for Leiston has been modified so it is more positive about housing taking place in Leiston, giving priority to affordable housing. Nuclear safeguarding will influence future expansion of the town to the east but brownfield and green field sites are available. (p10)
Saxmundham. Consideration needs to be given to improved sustainable transport links between Leiston and Saxmundham, particularly if Saxmundham Middle School is to close and children aged 11-13 will need to travel to Leiston High School.	
Woodbridge. The "Gateway" label should not be used in a way that will channel traffic	SP26 the policy for Woodbridge promotes active traffic management

<p>through the town, thereby exacerbating existing AQMA issues.</p>	<p>so it is not disadvantaged by its “gateway” role, especially considering the challenges of the location of the existing AQMA, which is noted in the supporting text. (p10)</p>
<p>SP20 Area east of Ipswich includes reference to preserving and enhancing environmentally sensitive locations within the Ipswich Policy Area and surrounding area. This needs to be followed through into the Area Action Plan to preserve the sensitive biodiversity of the Deben estuary designated area. The Martlesham Action Area Plan also needs to consider the impact of the distance of developments from designated sites (as set out in the Appropriate Assessment), consider and manage the impact of increased traffic, congestion and parking on popular villages on the Deben estuary stemming from people making recreational visits either for using riverside pubs, walking, exercising dogs or accessing boats. A site specific appropriate assessment will also be required of the Adastral Park site planning application.</p>	<p>The policy now acknowledges the need for site specific appropriate assessment of the proposal to use land immediately abutting Adastral Park and for an Area Action Plan recognising the sensitivity of the Deben Estuary SPA. (p9)</p>
<p>The cumulative effect of housing development in Ipswich which will result in additional recreational trips to designated areas in Suffolk Coastal, particularly the Deben estuary, has been highlighted in the Appropriate Assessment and the need for mitigation in the form of provision of a country park or other similar high quality provision in the north Ipswich area. It will be important that in the Martlesham Area the required new open space is provided as part of the housing development and is available when people first start moving into the site to enable patterns of recreational exercise to be established that does not rely on access to the estuary. This needs to be suitable for dogs exercising off the lead. Such open space should be developed in the context of habitat creation, creating physical corridors or stepping stones, linking up with other space in the area, and the proposed country park provision within the Ipswich Northern Fringe development as this will provide an opportunity to implement government policy as set out in the White Paper The Natural Choice: securing the value of nature (June 2011).</p>	<p>Ipswich Borough Council propose the provision of a country park within the northern fringe development. The modified SP20 policy for the Area east of Ipswich also requires a strategic open space to be provided in the form of a country park or similar high quality provision to mitigate the impact of development on the land south and east of Adastral Park and wider cumulative impact of residential development on the Deben and Orwell Estuaries and the Sandlings.</p> <p>SP20 also requires the Martlesham, Newbourne and Walderingfield Area Action Plan, or project, to give priority to creating a safe and attractive environment, including advance planting and landscape to create new settlement boundaries and contribute to biodiversity and the ecological network. The policy also requires the Area Action Plan, or project, to be supported by an Appropriate Assessment and if the results of this show part of the strategy cannot be delivered without adverse impacts on the Deben Estuary SPA which cannot</p>

	be mitigated then the plan will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect on the SPA. (p9)
In response to the concerns about the effect of tourism development and of demand for recreational destinations for increasing numbers of local residents (due to new housing), there will be a need for wardening and visitor management of popular destinations along the Deben estuary and along the Heritage Coast. This would be best guided by a visitor management plan to manage and monitor recreational access and birds on designated sites. These measures need to be co-ordinated across the Suffolk Coast and Heaths Area of Outstanding Natural Beauty. Wardening and visitor management guided by a visitor management plan to manage and monitor recreational pressure and birds would be required as mitigation against the impacts of increased visitor pressure on Natura 2000 sites.	Modified SP20 includes reference to the November 2011 Appropriate Assessment that proposes mitigation measures including improved visitor infrastructure including wardening. (p9)
Development management policies	
DM 5 Houses in multiple occupation needs to include reference to urban areas or specify that it requires such buildings to be located close to a good range of services so it will have greater impact on encouraging sustainable transport use.	The supporting text now says locations close to a good range of services are likely to be the most suitable to this type of use (minor modification). (p16-17)
DM22 Design – Function should include reference to the need to design space for the storage of recyclable and non-recyclable waste including composting, to assist in achieving waste minimisation and recycling as it is not picked up elsewhere.	A minor modification to the supporting text to this policy recognises that provision of accommodation for larger bin storage to facilitate recycling is an example of functional design. Although this will not reduce waste, it will help facilitate recycling. (p17)

In undertaking the SA of the modifications to the plan following the Public Inquiry the following issues were identified:

SP1a: Presumption in favour of sustainable development where additional wording taken from the NPPF to add to SP1a omitted the following footnote.

For example, those policies relating to sites protected under the Birds and Habitats Directive and/or designated as SSSIs, Local Green Space, an AONB, Heritage Coast, designated heritage assets and locations at risk of flooding or coastal erosion.

SP4: Gypsies, travellers and travelling showpersons where gypsies were not included in the policy for liaison regarding sites.

DM27: Biodiversity and geodiversity where the wording of the revised policy omitted reference to geodiversity and did not follow national guidance.

Appendix D where concern was raised regarding the deletion of saved policies relating to Conservation Areas, Historic Parks and Listed Buildings.

As a result of the draft SA highlighting these issues further changes were made to supporting text, policy wording and list of saved policies in the Core Strategy and agreed with the Inspector (i.e. Footnote added to SP1a; wording change in SP4, further saved policies added to Appendix D). The change to the wording of DM 27 Biodiversity and geodiversity was significant given the wording had been agreed between parties at the Public Inquiry. As a result the policy was reworded to ensure it is robust in its protection of biodiversity and geodiversity whilst recognising that there might be particular challenges in Suffolk Coastal that may meet the exceptional requirements of Article 694 of the EU Habitats Directive. The subsequent published SA addendum 2013 is an assessment including these changes.

The SA addendum 2013 for the modifications has only two recommendations. These are set out in Table 3 with Suffolk Coastal's response.

Table 3: SA Addendum 2013 of the Plan Modifications

SA proposal	SCDC response
Core Strategy	
SP21 <i>Felixstowe</i> needs to include encouragement of investment in public transport and sustainable travel infrastructure to reduce demand so that the need to improve the capacity of the local road network and solution by means of a new link road is an option of last resort if other actions fail.	SP11 Accessibility seeks to maximise opportunities for local journeys to be made by means other than private car however the evidence base transport studies suggest consideration may need to be given to the provision of a new link road between Candlet Road and Trimley High Road to accommodate new residential development.
Combine SP9 <i>Retail centres</i> and paragraph 3.92 to clarify the sequential approach and potential role of out of centre retail locations for a limited number of larger scale modern retail developments. (<i>Comment made as a result of Martlesham Retail Park being removed from SP9</i>)	Martlesham Retail Park is a car-based out-of-centre facility and the NPPF indicates that unless identified in a Local Plan, existing out of centre developments do not constitute District centres. Any additions to it would be subject to the impact on the viability and vitality of town centres, but including the capacity of such centres to accommodate new floorspace.
Development Management	
None	

4. How opinions expressed during the consultation on the draft plan and environmental report have been taken into account within the plan as adopted

Consultation responses received on the draft plan and sustainability appraisals undertaken at each stage of plan preparation and public consultation have been systematically reviewed and a response recorded for each comment. Those specifically relevant to the SA have been recorded in each subsequent iteration of the sustainability appraisal (see pages 16 -23 on the November 2011 Sustainability appraisal). Key changes stemming from comments made include:

- Dispersed growth in Felixstowe is now included in SP21
- Concerns about the amount of housing in the East Ipswich area and sensitivity of the Deben SPA and Suffolk Sandlings SPA to residential development have resulted in specific mitigation requirements being written into SP20 Eastern Ipswich plan Area, SP21 Felixstowe with Walton and Trimley villages and DM27 Biodiversity and geodiversity and supporting text.
- The role of green infrastructure in the Ipswich Policy Area has clarified where delivery will take place and improvements to Policy SP20 have been made.
- Concerns about congestion and traffic impacts have led to wording changes in SP21 for Felixstowe and to the supporting text linked to SP10, recognising the community aspirations of a four village by-pass for Farnham, Little Glenham, Marlesford and Stratford St Andrew.

The comments from 24 respondents on the final addendum sustainability appraisal (2013) of the modifications to the plan and options for housing were considered by Suffolk Coastal District Council at an [Extraordinary Council Meeting](#) on 20 May 2013. A list of respondents and comments was attached as Appendix 1, plus consideration was given to further representations made on the February 2013 SA by NANT and Savills on behalf of Persimmon Homes and Grainger Plc (attached as Appendix 2 to the above report). It was concluded that the procedural and strategic comments made did not give rise to any issues that required further changes to the plan or the approach resolved at the meeting of Full Council 17th January 2013.

5. The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives considered

5.1 Consideration of alternatives

The European Directive 2001/42/EC (the SEA Directive) requires that an environmental report (such as an SA) should, identify the likely significant effects on the environment of implementing a plan and reasonable alternatives.

Policy options/alternatives were considered in the following sustainability appraisal documents:

- Sustainability Appraisal of Core Strategy and Development Policies (draft Preferred Options) December 2007. This looked at the Core Strategy policies and alternatives. Some draft preferred policies did not have options because the area of concern had been discussed in the Issues and Options paper and no options had been identified even following

consultation (CS10 Retail floorspace, CS16 Design, CS17 Construction, CS21 Infrastructure, CS22 Local services, CS23 Sport and Play, and CS 24 Green space.) As noted in the SA at the time in 2007 for some policies there were no realistic options as government policy required a particular approach, which is new (so continuation of existing trends would be unrealistic and therefore not worth assessing). For example CS18 sets out SCDC policy on renewable energy. Planning Policy 22 advocated the encouragement of schemes that utilise renewable energy resources. For others the scope of the policy direction was set by government policy (eg CS7 New jobs (set by the Regional Strategy), CS 12 Travel, CS13 Connectivity (Local Transport Plan) CS 19 Nuclear power, and CS 14 Biodiversity).

- Core Strategy and Development Control Policies Preferred Options Sustainability Appraisal December 2008. In this document published for public consultation, preferred options were identified for every policy (Core Strategy and Development Management policies) and for housing in particular, several variants were tested looking at different numbers of housing allocations or different geographical distributions. This included a new allocation of 1,050 homes in the Ipswich Policy Area, 1660 on the Felixstowe Peninsula, 600 in market towns, 200 in Key and local service centres and different distributions within these areas. The December 2008 Sustainability Appraisal also included the summary of Strategic housing growth options in the Ipswich policy area (5 options) and Felixstowe Peninsula (6 options). Strategic options were also assessed for employment land, economic development in rural areas, tourism and retail centres. As noted in the SA at the time, “considerable change has occurred in the content of the Core Strategy set of policies as the development control policies have been devised. The first version contained 24 Core Strategy policies whilst the latest version has 31. Policies or parts of policies have moved to the development control set, necessitating consideration of the relationship between the two. The level of change in the wording of the Core Strategy policies was significant enough in nearly all cases to require the policy to be reassessed and the previous version treated as an option”.
- Sustainability Appraisal of Core Strategy and Development Management Policies September 2009. A key role of this appraisal was to check the robustness of the strategic core policies and development management policies as a whole. The Sustainability Appraisal included a table showing how the latest policies compared to those assessed in the December 2008 sustainability appraisal. In this SA 2,000 houses were assessed in the Ipswich Policy Area; 1,000 in Felixstowe Peninsula, 950 market towns and 490 Key and local service centres. January 2010 SA was undertaken to assess the comparative sustainability of locating 2,000 houses in the EIPA in each of the Options 1-5 (see p16). The January 2010 SA work was formally published in August 2011.
- Sustainability Appraisals in June 2010 and November 2010 looked at further amendments to policy wordings and 2,100 house allocations in Eastern Ipswich Plan area (EIPA), 1,440 Felixstowe Peninsula, 940 market towns and 780 Key and local service centres. However it should be noted that additional 100 in the Eastern Ipswich Plan area is a result of the

granting of two planning applications associated with existing Master plans, but not originally envisaged as part of them and that 100 new housing allocations have been taken out of other areas.

- Part B of the 2013 Addendum is an appraisal of options for changing the total housing figure following the revocation of the Regional Spatial Strategy. It assesses the modified overall housing figure of 7,900; the objectively assessed figure of 11,000; and the option of suspend or withdraw the plan now.

The above illustrates that alternatives have been considered for the whole range of planning topics considered relevant to the plan for this geographical area but that housing has been examined several times in detail. In the early days of consideration of strategic options for the distribution of housing in 2006 -7, a completely dispersed distribution across the District was not regarded as a realistic alternative as the prevailing government thinking at the time and regional strategy dictated was the need to focus on a settlement hierarchy that could offer a range of services to residents. The following section 5.2 summarises the step by step decision making journey made by the Council as it sought to take on broad changes in government policy thinking during a period of government change.

The reasons for the Council deciding on particular policy options depend upon the nature of the policy being considered, reflecting environmental, statutory, local consultation responses at different stages of plan preparation. Decisions and reasons for all policy choices taken over the process of plan preparation are fully documented in [Appendix 6 to the November 2011 sustainability appraisal](#).

The most debated policies have concerned housing requirements and distribution. Decisions have been taken in the best interests of overall sustainability, balancing the needs of the District as a whole for new housing growth against proximity to key infrastructure facilities, employment and environmental sensitivities. A further important consideration in respect of the EIPA in particular has been the need to provide a sufficient number of houses in one development area to provide critical infrastructure, discussed further below. The evolution of these policies and the choices made between reasonable alternative options are explained in more detail in the following sections.

5.2 Overall housing numbers

[Appendix 3](#) to the paper provided to Suffolk Coastal District Council on 20 May 2013 concerning the comments received on the Addendum SA on the modifications to the plan, is a detailed summary of the SA process in relation to the development of housing policies and the reasons for choosing the approaches taken to overall housing numbers and the distribution of housing. The following section sets out the key points.

Consideration of overall housing numbers began in February 2007 with consultation on an Issues and Options paper. Three options were considered:

1. To reduce housing numbers from the RSS level over the plan period;
2. To meet the numbers required from the RSS;

3. To provide for development levels over and above the RSS by extending the plan period.

From this the Council agreed a preferred option of 7,800 new houses to meet the RSS requirement (as extended to 2024 11,730 houses but taking into account 1,540 completions 2001-2007). This was subject to SA in December 2007, assessed alone as it was considered by the Council as the only reasonable approach to meeting the requirement of the RSS and national requirements to achieve a 15 year land supply.

As the role of the Eastern Ipswich Policy Area (EIPA) has been a key area of debate in the development of the housing strategy in the Core Strategy, it is helpful to set out its origin.

The Ipswich Policy Area (IPA) is a long-standing sub-regional designation from the former East of England Plan (EoEP). It incorporates the whole of Ipswich Borough together with parts of Babergh, Mid-Suffolk and Suffolk Coastal District Councils which abut the Ipswich Borough boundary. It reflects the fact that Ipswich, the county town for Suffolk, exerts an influence which extends beyond the administrative boundary of Ipswich Borough. With the abolition of the EoEP on 3rd January 2013, it is these functional and cross-boundary inter-relationships which continue to be supported by each of the relevant local planning authorities through their individual Core Strategy documents, as it still provides the best basis on which to address issues such as strategic infrastructure provision.

Within Suffolk Coastal, the original omission of the parish of Westerfield from this original designation appears as an anomaly and its inclusion is the only change proposed in terms of how the IPA is defined. For planning purposes the cross-boundary area between Ipswich Borough Council and Suffolk Coastal District Council is known as the "Eastern Ipswich Plan Area (EIPA).

In the December 2008 Core Strategy and Development Control Policies Preferred Options consultation document, 4 options for the housing numbers policy (now SP17) were discussed.

- Option 1 was to reduce the overall provision. (from East of England Plan figures)
- Option 2 was to increase the apportionment to the Ipswich Policy Area and reduce it elsewhere (from East of England Plan figures)
- Option 3 was to increase the allowance for small windfall sites, reducing the need to make allocations.
- Option 4 (Preferred) was to make provision in line with the RSS requirement as projected forward to 2025 to provide a 15 year housing land supply, taking into account current completions, thus 7,710 new house with 1,505 in the Ipswich Policy Area.

The SA assessed the Preferred Option (4) with 2 alternatives regarded as reasonable. Option 1 was not subjected to SA because it failed to comply with national and regional policy and the Council had rejected it as a reasonable alternative. Option 2 was not the preferred option because it would reduce the opportunity to make new allocations elsewhere in the District and would fail to address affordable housing and local circumstances such as regeneration.

Option 3 was considered unrealistic since the provision of windfall sites is unpredictable and over-reliance on them would introduce uncertainty.

At a meeting of 16 June 2009 the Local Development Framework Taskgroup (LDFTG) the housing policies were considered in the light of the consultation comments and noted that as the plan would not be adopted until 2010, the RSS requirements would need to be further extrapolated and further completions factored in and the SA of the plan reassessed. Full Council adopted the emerging Core Strategy as interim planning policy in March 2010. On 27 May 2010 at a meeting of Full Council it was noted that the Coalition Government intended to revoke Regional Strategies. It was agreed to continue with the publication of the draft Core Strategy and when things became clearer, decide if policies needed to be changed before submission to the Secretary of State.

In June 2010 the Council published the draft Core Strategy as interim (albeit non-statutory) planning policy. It was accompanied by an updated SA. In the meantime Government policy clarified that there was a need to reconsider the overall level of homes to be provided in the plan period (now extended to 2027 Local Development Framework Taskgroup (LDFTG) Local Development Framework Taskgroup (LDFTG) to provide 15 year land supply at the likely 2012 adoption date). The Council agreed to review the evidence base and produce a 'Reviewed' draft Core Strategy. This was published for consultation in November 2010 with an updated SA. This identified a total housing need for the district to 2027 of 11,000 new homes (provided by a commissioned forecasting model) and by balancing potential new sources of housing against total identified needs, proposed 7,590 new homes (of which 5,260 would need to be new allocations). This was a reduction of 70 houses from the published interim policy. The November 2010 SA included a comparison table of how the new policies compared with those which had been assessed previously. The revised numbers in policy SP2 Housing Numbers was compared with the previous proposal, but it was concluded that a reduction of 70 was not significant for the purposes of the SA.

Further work was undertaken on the amount of land suitable, available and deliverable and it was reported to the Committee in January 2011 that under the current agreed distribution strategy the reduced level of housing was appropriate but only on the basis that an early review of the plan took place, which was duly agreed. Hence the pre-submission Core Strategy published in November 2011 continued to propose 7,950 houses with an early review in 2015. This was accompanied by an updated SA.

The Core Strategy proceeded to examination in public and following the hearings in October and November 2012, modifications were suggested that would increase the total housing to be provided in the plan to 7,900. The Inspector noted in correspondence with the Council (7 December 2012) that the submitted SA did not include the reasonable alternatives to the overall amount of housing and suggested that the Council may wish to update the SA. The Council did this by reference to the three alternatives: meeting the objectively assessed need, suspending or withdrawing the plan or proceeding with the preferred option.

As a result the sustainability appraisal at the modifications stage of the plan preparation (post Examination Hearings) appraised three strategic options for housing following the revocation of the Regional Spatial Strategy. The three options considered were

- (1) the preferred option (i.e. the provision of 7,900 houses coupled with an early review);
- (2) meeting the objectively assessed housing needs by providing for 11,000 houses; and
- (3) suspending or withdrawing the plan and starting again to undertake further work on a revised overall housing figure.

The SA concluded that the preferred option of 7,900 houses with an early review was challenging but achievable and there were more positive than negative impacts, although significant mitigation and monitoring was needed. The full provision of 11,000 houses was assessed to be predominately negative or uncertain given that the scale and rate of development had not been fully tested and could outstrip the ability of mitigation measures to protect sensitive environmental designations or provide adequate infrastructure. Suspension or withdrawal of the plan had the most negative implications of the three options because it created a planning vacuum and uncertainty, and dependency on the NPPF alone could have a long lasting and harmful legacy. A precautionary approach was suggested, with the outcome that the most environmentally sustainable option was adopted by the Council as being the preferred option. This was published together with a schedule of all proposed main modifications to the strategy and put out for consultation on 21st February 2013.

Full Council considered the consultation responses and SA on 20 May 2013 and determined that there were no new issues arising that required any change to the plan.

5.3 Distribution of housing

As with the issue of overall numbers, Appendix 3 to the report for the Full Council meeting on 20th May 2013 provides a detailed explanation of the way in which the policies on housing distribution have evolved and reasonable alternatives have been considered. Interested readers should refer to that document. What follows is a summary of the key points.

As part of the Council's Core Strategy: Issues and Options consultation in February 2007 the following options for the Ipswich Fringe, Felixstowe, the Trimleys and to a lesser extent the market towns, were identified: (1) locating new housing in a specific area on one site; (2) locating the new housing on two or, if numbers permitted, three areas possibly located apart from each other; and (3) pepper-potting development on a number of small sites spread over a number of areas. The advantages and disadvantages of each option were set out, and related mainly to infrastructure and community considerations.

The Local Development Framework Taskgroup (LDFTG) considered the approach to new housing and summary of responses on 11th September 2007. It was noted that consultees had viewed a single allocation as being the least preferred option, but were advised that such an approach had advantages

including the creation of community facilities, the opportunity to develop a better housing mix, and the creation of a better long term planning framework taking into account infrastructure in particular. As a result the LDFTG endorsed the report proposals that one or at most two strategic sites be identified within each settlement.

In February 2008 the Council consulted on broad housing locations within the EIPA and other areas in the Preferred Options document. This recorded

“a preference for these strategic levels of development to be concentrated on a small number of sites, not least to maximise opportunities to secure appropriate new and improved social and community infrastructure provision ...” (paragraph 2.3).

The principle of housing allocation was further considered by the LDFTG in a meeting on 28th July 2008. The minutes record that:

“Infrastructure was extremely important. The Head of Planning Services explained that one year ago the Task Group had decided that in order to ensure and deliver infrastructure it would be more difficult if the housing developments were in smaller groups, hence the decision to build one large development. Some Task Group members considered that the possibility of putting houses within more than one Option should be revisited as there was considerable opposition to 1050 houses within one place. The Head of Planning Services pointed out that there had been a clear steer from Government that building on 3/4 sites would not deliver community cohesion ... The Task Group decided that infrastructure issues were crucial and any outcome from the Task Group’s discussion would depend on that. Increased strength on roads, schools, health etc would need to be highlighted within the strategy document. The Task Group decided that they were happy to go forward with one preferred Option.”

These issues were further discussed and considered at Cabinet on 24 February 2010 and the Cabinet endorsed the strategy including the single allocation in the EIPA. A more dispersed approach to new housing was not considered to be a sustainable or reasonable alternative to a single allocation in the EIPA because it would create further pressure on existing inadequate infrastructure, be poorly connected to services, community infrastructure and jobs and would not give rise to the provision of sufficient new infrastructure to support the enlarged population overall.

Distribution within the Eastern Ipswich Plan Area (EIPA)

A draft preferred options document created in November 2007 identified four possible locations for housing in the EIPA together with some of the key opportunities and constraints for each option. At that stage option 3 (East – Kesgrave South and Martlesham) was the Council’s indicative preferred option for growth. The sustainability appraisal (SA) of the draft preferred options undertaken in December 2007 indicated that all four proposed options would have negative impacts on the conservation and enhancement of biodiversity and geodiversity.

SA was undertaken on the Strategic housing options in the Ipswich Policy area (5 options) and Felixstowe Peninsula (6 options) and results considered at the 28 July 2008 LDFTG meeting. The report accompanying the SA recommended Option 4 (East of Martlesham Heath/A12) as the preferred option due to the fact that it is immediately adjacent the major employment centre at Martlesham

Heath, which includes the BT Research Centre and there is the opportunity to create a new community; large enough to support new facilities and services, including a school. Members of the public and parish councillors, together with other interested parties, spoke at the meeting in relation to the options. The LDFTG endorsed Option 4. As a result the Core Strategy Preferred Options was published for consultation in December 2008 (with an accompanying SA) that identified the East of Martlesham Heath/A12 area as the preferred location for an allocation of 1,050 houses. The Core Strategy Preferred Options document summarised the alternative options which had been considered during the February 2008 consultation, and explained the disadvantages of those options. The document as a whole, therefore, explained the considerations which led to the selection of the preferred option and the rejection of the alternative options.

At a meeting on 16th June 2009 the LDFTG considered a recommendation that the housing allocation in the EIPA be increased to 2,000 units. The report to the LDFTG noted (in appendix 2 paragraph 86) that in the EIPA:

“there is the opportunity, by increasing the proposed housing numbers east of the A12 at Martlesham, to create a self-contained and sustainable community to include community, leisure, education and health facilities as well as employment. This might not be achieved if the number of new houses is restricted to 1000, particularly in respect of local education provision.”

Discussion at the meeting noted that the additional facilities supported by a larger allocation could also be used by the whole of Martlesham and thus create an integrated community. LDFTG confirmed the favoured approach to be a concentrated development of 2000 houses to provide a living community with supportive infrastructure on Option 4 East of A12. It was not considered necessary to revisit the preferred location of the housing.

In September 2009 a public consultation took place on the proposed increase in the EIPA housing allocation to 2,000 units, to be located at Martlesham. The reasons for favouring an allocation on a single site continued to apply and the reasons for preferring Option 4 as the location for the housing in the EIPA also continued to apply. This was accompanied by an updated SA that looked at the developing Core Strategy as a whole, including the allocation of 2,000 houses East of the A12 in the EIPA. The SA concluded that policy SP20 was marginally less sustainable than it had been in previous assessments and noted concern regarding proximity of the Deben Estuary and the need for Appropriate Assessment (paragraph 2.4).

In January 2010 further SA work was undertaken in view of the strength of some comments received on the September 2009 consultation in order to assess the comparative sustainability of locating the proposed new allocation of 2,000 houses in the EIPA in each of Options 1-5 which had originally been the subject of the February 2008 consultation. This work was formally published in the public domain and consulted upon in August 2011. It concluded that, comparing Options 1-5 for an allocation of 2,000 houses, Option 4 was very marginally the least sustainable option, although all options generated similar concerns surrounding cumulative impact on Natura 2000 sites (p.180).

There was further discussion regarding the approach to housing distribution at a Cabinet meeting on 24 February 2010 but Councillors concluded there was no reason to change their view of Option 4 as the preferred approach due to it being adjacent the major employment centre at Martlesham Heath, and presenting the opportunity to create a new community; large enough to support new facilities and services, including a school. The draft Core Strategy was endorsed and subsequently went to Full Council on 18 March 2010 and was approved for submission and for adoption as interim planning policy. This was published in June 2010 with an updated SA. The SA concluded that, with the addition of policy wording seeking to preserve and enhance environmentally sensitive locations, policy SP20 was now marginally more sustainable than it had been in the previous assessment. The SA noted that whilst the policy attempted to mitigate against impacts on the Deben Estuary, further measures would likely be required and a more detailed Appropriate Assessment would also be needed (p.42), for more specific plans or projects.

Following the change in government in May 2010 the Core Strategy was reviewed and published in November 2010 with an increase to the EIPA housing allocation to 2,100 (the additional 100 houses reflecting a recent planning permission). An updated SA was also published which concluded the changes were insignificant and did not impact the SA.

Following correspondence challenging legal compliance of the plan, it was decided to carry out further work on the SA and AA. A further version of the SA was published in June 2011 that included an updated baseline and reference to a research report by Footprint Ecology "South Sandlings Living landscape Project Visitor Survey report" February 2011 particularly relevant to the EIPA.

Another SA was published in August 2011 following consideration by the Council of further comments on behalf of NANT. This included a detailed Appendix 6 which set out a summary of the decision making process and reasons for the selection or rejection of alternative options, including cross references to other documents to avoid the 'paper chase' criticised in the Forest Heath case. The SA was also updated to take into account the outcome of the AA and in particular the mitigation required as a result of that assessment. A new Appendix 8 (which included the January 2010 SA strategic housing options, previously unpublished) was also included. Formal consultation took place for 6 weeks to 14 October 2011.

The November 2011 Pre-Submission versions were then prepared and referred back to Full Council, which considered the matter during a meeting on 15th December 2011. During that meeting, a motion was proposed which would have required the Council to carry out a fresh SA of each of the strategic options for the EIPA and to reconsider the preferred option. There was a vote and the motion was lost. The Council approved the Pre-submission documents and resolved that a pre-submission consultation would take place, followed by Submission for Examination. The November 2011 SA had been updated to reflect comments made in the October consultation particularly by the statutory agencies, and regarding water quality but it did not change the overall conclusions to the appraisal.

Consistently with the position throughout the development of the Core Strategy, Policy SP20 was the subject of much discussion during the Examination, although no concrete alternative proposals were put forward for new housing in the EIPA. A Council meeting took place on 17th January 2013, whereby the strategic options to the overall housing approach, following the revocation of the East of England Plan were debated. The results of that meeting fed into the list of CS Modifications. Overall the Modifications agreed strengthen the environmental sustainability of the policy with the intent to avoid adverse impacts on European sites. These were subjected to a SA which went out to public consultation in February 2013 alongside the modifications. An Extraordinary Meeting of the Council considered the consultation responses on 20 May 2013 and concluded that the procedural and strategic comments made did not give rise to any issues that required further changes to the plan or the approach resolved at the meeting of Full Council 17th January 2013.

Distribution in Felixstowe

In the Felixstowe area a range of geographical alternatives were considered, including areas around the north east of the A14, between the Trimley villages, between Trimley and Felixstowe (Walton), North Felixstowe, North east Felixstowe and Innocence Farm, Kirton. The Council's decision following consultation however, was to proceed with a strategic approach which involved the dispersal of housing across the Felixstowe area, avoiding prime agricultural land where possible. This approach was considered to best represent the particular interests of the local area, providing regeneration opportunities and diluting adverse impacts across a wide area.

6. Measures that are to be taken to monitor the significant environmental effects of the implementation of the plan

The SA for the Core Strategy and Development Management Policies (November 2011) includes a table (Table 7.6) of indicators that it recommends be monitored to ensure any significant or uncertain effects of the plan are kept under review during the implementation of the plan. The list includes contextual and significant effect indicators, and is a sub set of the original SA Framework plus other indicators considered important as identified as a result of the SA work. The SA indicators include outcome indicators, for example related to health. There is no requirement to set up new monitoring arrangements as existing regulating regimes and data processes exist that can provide information, for example Environment Agency requirements under the Water Framework Directive, DEFRA's requirements for Air Quality Management Areas and Public Health England regarding health.

The Core Strategy itself has a Monitoring framework (Table 6.2) that reflects a large number of the indicators suggested by the SA. This framework focuses on monitoring the effectiveness of the plan and planning process. Information is available from other data sources that will allow monitoring of the indicators not specifically included in the Core Strategy Monitoring framework that will allow review and comment in the Council's Annual Monitoring Report as may be necessary. The SA indicators include social outcome indicators that the Core

Strategy Monitoring Framework does not include (e.g. Educational attainment A*-C grades at GCSE and death rates). Such data is easily available and may be important to report in the AMR although it is recognised that the reasons for outcomes will be complex and not be solely due to activities linked to plan implementation.

Table 4 sets out how the SA indicators will be monitored, noting if they are in the Core Strategy Monitoring Framework or if data is available elsewhere.

Table 4: SA indicators

(CS column √ indicates included in Core Strategy Monitoring Framework)

No	SA Objective	Performance Indicator	CS	Source if not in CS
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. Radio nuclides 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	√	Public Health SCC Public Health England Suffolk Police Public Health England ONS 2011 Census & SCC Public Health England District Council
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		SCC ONS 2011 Census ONS
3	To reduce crime and anti-social activity	Crime per 1000 population. Violent crime. Fear of crime. Noise & odour complaints.		Suffolk Police Home Office survey District Council
4	To reduce poverty and social exclusion	% population in 10% most deprived SOAs Housing benefit recipients	√	IMD District Council
5	To improve access to key services for all sectors of the population	% population with access to key local services (food shop, PO, school)	√	District Council
6	To offer everybody the opportunity for rewarding and satisfying employment	Unemployment rate. Average earnings.	√	ONS ONS
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.	√ √ √	District Council District Council SCC DCLG ONS
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		DCLG DEFRA District Council DCLG District Council DCLG

		activities. Rate if racist incidents. Visits to museums.		Suffolk Police English Heritage
9	To maintain and where possible improve air quality	Air quality. Number of AQMAs.		District Council
10	To maintain and where possible improve water quality	Radioactivity in local water. Water quality in rivers, bathing water and catchment areas.		Public Health England Environment Agency
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.	√	All District Council
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.		ONS Anglian Water Environment Agency
13	To reduce waste	Household (and municipal) waste produced. Tonnage recycled, composted & landfilled		All DCLG
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	√	SCC Work ONS 2011 Census School SCC
15	To reduce emissions of greenhouse gasses from energy consumption	Domestic electricity & gas consumption. Energy efficiency of homes. Installed electricity capacity using renewable energy. Proportion of CO2 emissions from domestic, industrial and transport sources now available.		Department for Energy and Climate Change Regional Renewable Statistics (from the RSTATS (Renewable Energy Statistics) database)
16	To reduce vulnerability to flooding	Planning applications approved against EA flood risk advice. Properties at risk of flooding from rivers or sea. Incidence of coastal and fluvial flooding (properties affected). Flood warnings issued.	√ √	District Council Environment Agency
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.	√ √	Environment Agency
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		English Heritage

		SAMs damaged by development. Planning permissions affecting known or potential archaeological sites.		District Council
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.		District Council District Council DCLG District Council District Council National Association of Areas of Outstanding Natural Beauty Environmental Protection UK
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)	√ √ √	District Council District Council HMRC ONS
21	To revitalise town centres	Vacant units in town centres.	√	DCLG
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.	√ √	ONS 2011 Census District Council ONS 2011 Census District Council Dept for Transport District Council
23	To encourage and accommodate both indigenous and inward investment	Number of enquiries to business advice services from within/outside area. Business start ups and closures. Employment land availability. Employment permissions and allocations.	√	District Council HMRC District Council District Council

Key: SCC = Suffolk County Council; ONS = Office for National Statistics; HMRC = Her Majesty's Revenue and Customs; DCLG = Department for Communities and Local Government.