



# **Sustainability Appraisal of Core Strategy and Development Management Policies**

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

**November 2011**

**Prepared by Business Development, Suffolk County Council**

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## **SECTION A**

### **NON-TECHNICAL SUMMARY**

## NON-TECHNICAL SUMMARY

### 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 Reviewed Core Strategy and Development Management Policies (November 2010) as amended following consideration by Cabinet in February and July 2011 and Council in July 2011. These policies will, when formally adopted, form part of Suffolk Coastal District Council's Development Plan Framework. The sustainability appraisal has been further updated following consideration of the results of consultation held specifically on the document for 6 weeks to 14 October 2011. Some further updating has been done following this and has resulted in some small changes to reflect comments made, particularly by the statutory agencies, and regarding water quality but it has not changed the overall conclusions to the appraisal.

Baseline information on key aspects of the environment, economy and society published in the Scoping Report (2006) have been updated. There are now two Air Quality Management Areas in the District, workplace and resident jobs have fallen over the last 2 years and unemployment is the 3<sup>rd</sup> highest of the Suffolk Districts (behind Ipswich and St Edmundsbury) at 7.1%. The health of people in Suffolk Coastal is generally better than the England average, although the rate of physical activity in schools is significantly worse than the England average. Suffolk Coastal is the second least deprived of the Suffolk Districts. It has a large Area of Outstanding Natural Beauty, Suffolk Coast and Heaths, that includes several RAMSAR and Special Protection Areas.

Twenty three sustainability objectives spanning environmental, social and economic factors were used in the appraisal. Their compatibility with the fifteen plan objectives revealed no plan objectives had more negative compatibilities with sustainability appraisal objectives than positive. One sustainability appraisal objective that had more negative than positive compatibilities was the reduction of waste. Statements that support waste minimisation are absent and this is also the case in the core strategy and development control policies.

This particular appraisal is the last of several iterations that have been prepared for Suffolk Coastal District Council at various stages of their plan preparation since 2007. Policy options/alternatives were considered in the following sustainability appraisal documents:

- Sustainability Appraisal of Core Strategy and Development Policies (Preferred Options) December 2007. This looked at the Core Strategy policies and alternatives. Some preferred policies did not have options because the area of concern had been discussed in the Issues and Options paper but no options set out. For these the "no plan" option was assessed which considered what would happen if existing policy (where it exists) and current trends continued.
- Core Strategy and Development Control Policies Preferred Options Sustainability Appraisal December 2008. In this document preferred options were identified for every policy and for some several variants were tested looking at different numbers

of housing allocations or different geographical distributions. This considered 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). The 2008 assessment of strategic housing growth options is appended to this sustainability appraisal to assist the understanding of the evolution of decision making.

- Sustainability Appraisal of Core Strategy and Development Management Policies September 2009 Options were not presented in this report although in some cases policies changed so they were regarded as a further option to the previous ones assessed. A key role of this appraisal was to check the robustness of the basket of 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.
- In January 2010 the sustainability appraisal of the strategic housing growth options was updated to consider the potential impact of 2,000 houses being accommodated in the Ipswich Eastern fringe. This is also appended to this sustainability appraisal to assist the understanding of the evolution of decision making.
- 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, 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.

The reasons for the Council deciding on particular policy options are varied depending on the nature of the policy being considered, reflecting environmental, statutory, local consultation responses and political factors. Decisions and reasons for policy choices taken over the process of plan preparation are fully documented in an appendix to this sustainability appraisal. The most debated policies have concerned housing requirements and distribution, where 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. As a result the Council has, after considering the advice in this sustainability appraisal and the Appropriate Assessment decided that with the appropriate mitigation measures, 2,100 houses could be allocated in the Eastern Ipswich Plan Area east of the A12 because of its close proximity to existing key infrastructure facilities and a strategic employment site that is also considered for expansion, in preference to other options for different dispersal patterns or lower housing numbers, having considered North Rushmere, north Kesgrave/Playford, South Kesgrave/Martlesham and Purdis Farm.

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 however was to go for 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 interests of the local area, providing regeneration opportunities and diluting adverse impacts across a wide area.

The resulting thirty Core Strategic policies and thirty-two Development Management policies were appraised, the results being compared to the previous policy appraisal. This



appraisal has also taken into consideration the latest policy development in the Ipswich Borough Council Core Strategy whereby it is now proposed that a land allocation be released for 1,000 -1,500 houses (as soon as a Supplementary Planning Document has been produced), before 2021.

The sustainability appraisal has involved systematically reviewing all policies against the twenty three sustainability appraisal objectives, considering if and how those policies would further the objectives. The results are recorded in sheets, one for each policy. The level of impact is gauged on a scale from strong positive, positive, weak positive, neutral to weak negative etc. Some policies can have positive and negative impacts and others have uncertain impacts.

#### 1.2 Likely significant effects of core strategy policies and mitigation required

Revision of the policy wording has improved the overall sustainability of the plan. The plan's greatest impact is likely to be on achieving sustainable levels of prosperity and economic growth throughout the plan area, offering rewarding employment, improving access to key services and conserving and enhancing the quality and local distinctiveness of landscape and townscapes. The policies are well focused on achieving a range of housing for different needs, although there is now an acknowledgement that certain towns will not be able to meet the strategic housing needs of the district.

Issues arising are:

Water Quality: Specific water conservation measures are included in a development management policy but this needs to be backed up with strategic guidance requiring the consideration of water quality and use of resources.

Air Quality : Maintaining and improving air quality is not specifically referred to in the plan policies but it will be achieved to some extent if the overall need for travel is reduced and is interpreted as an aspect of pollution as mentioned in the Climate change policy (SP12). A Strategic Planning Document on Air Quality is currently being prepared jointly by all Suffolk Districts and the County Council with the intention that each authority adopts it as a Strategic Planning Document. There are other air quality hot spots in Suffolk Coastal so an awareness of the possibility of air quality issues is needed when determining planning applications.

#### Historical and archaeological interest

Policy SP1 Sustainable development refers to conserving and enhancing the built environment and maintaining a sense of place. This could be interpreted to protect Listed Buildings and archaeological sites. However there is nothing in any of the core strategy policies that recognises the distinctive local archaeological asset or seeks to protect and enhance it. Suffolk Coastal has a rich Bronze Age and Anglo-Saxon heritage that has been developed as a tourist attraction in the case of Sutton Hoo, making an important contribution to the cultural offer, rural employment and tourist spend in the District.

The following mitigation proposals incorporate those remaining from previous iterations of the SA and are still considered relevant:

- 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.

- 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.
- 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 through the town, thereby exacerbating existing AQMA issues.
- 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.
- 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. Creation of a country park at the Foxhall Tip site could occur in the longer term, but careful timing of large scale housing development is required to ensure damage to designated sites does not occur before it is available. (It is noted in the Appropriate Assessment that its provision is not part of any mitigation requirements). Hence it will be important that in the Martlesham Area Action Plan 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, including the proposed Foxhall Country Park 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).

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.

### **1.3 Likely significant effects of the development management policies and mitigation required**

The range in the sustainability scores for the development control policies was less than those for the core strategy policies. However for the sustainability objectives the scores were far more divergent reflecting the specialist aspects the policies are covering and the need to apply them in the context of other development management policies and core strategy policies. The development management policies will specifically assist conservation and enhancement of the quality and local distinctiveness of landscapes, townscapes and areas of historical and archaeological importance. They would also assist in improving the quality of where people live and to encourage community participation. Although these are the areas of significant effects, on balance the policies were stronger in their social impact.

Only two policies were identified that could benefit from greater clarity as to their intentions:

- DC 7 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.
- 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.

Looking at the two sets of policies what is striking is their strength in the social Sustainability Appraisal objectives, supporting housing, particularly targeting affordable housing where it is needed (thereby addressing social inclusion and deprivation issues), maintaining services and improving the quality of where people live. Economic objectives are well balanced, seeking to provide employment well located to new housing growth but recognising the need for evolution of employment in the rural area. The plan is weakest in the minimisation of waste and encouraging recycling as too much depends on 4 words in one policy (SP12).

#### 1.4 Difference the process has made

This Sustainability Appraisal has provided an independent assessment of the Core Strategy, development management policies and the strategic housing sites. It follows appraisals undertaken in December 2007, October 2008, July 2009, June 2010, and November 2010 of draft core strategy policies. Many of the recommendations for changes to the wording of policies made at those stages have been taken up and are documented in this report, and this new appraisal confirms that the core strategy policies are sustainable. Hence a thorough independent check of the sustainability of Suffolk Coastal District Council's preferred options and alternatives has been undertaken as envisaged by government and EU guidance.

#### 1.5 How to comment on the report

**IF YOU WOULD LIKE TO COMMENT ON THIS REPORT, PLEASE CONTACT:**

Development.policy@suffolkcoastal.gov.uk

## **SECTION B**

### **INTRODUCTION**

## 2. Introduction

### 2.1 Purpose of the report

European Union Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes regulations 2004 require an assessment of the environmental effects of certain plans and programmes, known as Strategic Environmental Assessment (SEA). This legislation applies to plans and programme, and modifications to them, whose formal preparation began after 21 July 2004 (or those that have not been adopted, or submitted to a legal procedure resulting in adoption by 21 July 2006).

The objective of an SEA is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans with a view to promoting sustainable development.

Suffolk Coastal District Council is currently undertaking work on its Local Development Framework (LDF), in line with the revised planning system for development plans under the Planning and Compulsory Purchase Act 2004. This legislation also requires a sustainability appraisal (SA) to be undertaken on all relevant documents. The requirements of the SEA Directive have been incorporated into the requirements of the 2004 Act. SA is an iterative process that follows the various stages of plan preparation and looks at likely environmental, social and economic effects.

Since 2007, a number of sustainability appraisal reports have been prepared for Suffolk Coastal District Council on its draft Core Strategy and development management policies and possible strategic housing sites in East Ipswich and Felixstowe. Policy options for the Core Strategy policies were considered in the October 2008 report and a summary of decisions made regarding alternatives is included in Appendix 6. The District Council has revised its policies in the light of SA report findings, public consultation and anticipated abolition of the East of England Plan. Hence this sustainability appraisal looks at the revised set of policies plus the development management policies.

There are five sections to this report.

Section A comprises the non-technical summary of the sustainability appraisal of the Core Strategy policies, development control policies and strategic housing sites.

Section B sets out the approach taken to SA, method of assessment, background information on the current issues in Suffolk Coastal District, describes the sustainability objectives and looks at the compatibility between the SA and Plan objectives. With sections C and D it fulfils "Stage B" of the SA requirements for the two sets of policies.

Section C contains the SA of the 30 Core Strategy policies.

Section D contains the SA of the 33 Development Management policies.

The report has been written so Section D can be published with Sections A and B as a sustainability appraisal to support the Development Management policies.

### 2.2 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 4 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.

### 3. METHOD OF APPRAISAL

#### 3.1 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. These are the same as those for a SEA.

*Table 3.1: The stages of a Sustainability Appraisal*

<p><b>Stage A: Setting the context and establishing the baseline</b></p> <ol style="list-style-type: none"> <li>1. Identifying other relevant plans, programmes and environmental protection objectives</li> <li>2. Collecting baseline information</li> <li>3. Identifying environmental problems</li> <li>4. Developing SA objectives and testing their compatibility</li> <li>5. Consulting on the scope of the SA</li> </ol> <p style="text-align: right;"><b>Output: Scoping Report</b></p>
<p><b>Stage B: Developing and refining alternatives and assessing effects</b></p> <ol style="list-style-type: none"> <li>1. Testing the plan objectives against the SA objectives</li> <li>2. Appraising strategic alternatives</li> <li>3. Predicting the effects of the plan, including alternatives</li> <li>4. Evaluating the effects of the plan, including alternatives</li> <li>5. Mitigating adverse effects</li> <li>6. Proposing measures to monitor the environmental effects of implementing the plan</li> </ol>
<p><b>Stage C: Preparing the Sustainability Appraisal Report</b></p> <ol style="list-style-type: none"> <li>1. Preparing the Sustainability Appraisal Report</li> </ol> <p style="text-align: right;"><b>Output: Sustainability Appraisal Report</b></p>
<p><b>Stage D: Consulting and decision making</b></p> <ol style="list-style-type: none"> <li>1. Consulting on the draft plan and Sustainability Appraisal Report</li> <li>2. Appraising significant changes</li> <li>3. Appraising significant changes resulting from representations at the DPD Examination</li> <li>4. Decision making and provision of information</li> </ol> <p style="text-align: right;"><b>Output: Sustainability Appraisal Statement</b></p>
<p><b>Stage E: Monitoring implementation of the plan</b></p> <ol style="list-style-type: none"> <li>1. Finalising aims and methods for monitoring</li> <li>2. Responding to adverse effects</li> </ol> <p style="text-align: right;"><b>Output: Included in Annual Progress Report on Plan implementation</b></p>

The iterative nature of the SA process is demonstrated by the list of documents that have been prepared, some of which have been made available for public consultation, whilst others have been used internally by plan makers or used to brief Cabinet members at various points of plan preparation. There have been a number of reviews triggered by internal or national policy changes, that have been accompanied by SA, representing good practice. Public consultation on SA is required when policy documents are published for public consultation as part of the process of Local Development Plan preparation.

- June 2006 - SA Scoping Document. Prepared by SCDC covering both the Core Strategy and Site Specific documents.
- December 2007 SA of Core Strategy and Development Policies (Preferred options) published July 2011, originally used internally and updated for next document.
- December 2008 SA of Core Strategy and Development Policies (Preferred options). Published for public consultation with the Plan documents.
- Jan 2009 Strategic housing sites (Originally not published, but used internally) now Appendix 8
- June 2009 SA of revised core strategy and Development management policies and Strategic housing sites (Felixstowe and East Ipswich) Reported to SCDC Cabinet in July 2009 and published September 2009
- May/June 2010 - Full SA document produced in preparation for publication with Pre-Submission Core Strategy consultation. Change of government triggered rethink before publication.
- Nov 2010 Updated SA published with full text of June 2010 SA with Revised Core Strategy and Development Policies for public consultation
- August – October 2011 Updated SA published for 6 weeks consultation with the Appropriate Assessment.

This SA combines the November 2010 update, with the substantive SA of June 2010 but it also updates the baseline data for Suffolk Coastal and takes into account a research report by Footprint Ecology “South Sandlings Living landscape Project Visitor Survey report” February 2011, the Deben Estuary Visitors Survey (July 2011) and the Appropriate Assessment of the SCDC Revised Core Strategy and Development Policies (by The Landscape Partnership) August 2011. Some minor wording changes have also been made by SCDC at their Cabinet meeting on 17<sup>th</sup> February 2010 and these have also been taken into account. As a result of the 2011 consultation some additions have been made to the baseline material in the report and clarifications made.

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 autumn 2007 an initial SA was undertaken of the draft Core Strategy preferred options and at this stage baseline data was updated and consultation comments reviewed for relevance to the SA objectives. The baseline was updated again in June 2009 and June 2011 for use in this SA report. It has further been amplified following the results of consultation held for 6 weeks to 15 October 2011.

Stage B: Developing and refining options and assessing effects

There have been two iterations of this stage. An initial SA 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 in taking the process of plan development forward would be an assessment of the collective impact of the emerging policies. This was completed in December 2007.

In October 2008 Suffolk Coastal produced a revised set of Objectives and Core Strategy policies plus development control policies and a sustainability appraisal was undertaken. Public consultation took place. In June 2009 a further version of the Core Strategy and Development Management policies was finalised, and a further SA was completed and reported to SCDC cabinet in July 2009. It was published in September 2009 alongside the Core Strategy and Development Management Policies Housing Distribution – Updated Preferred Option consultation.

Strategic housing area appraisal is a form of assessment used to inform Councillors of the sustainability issues regarding potential areas for larger scale housing allocations. The areas were originally assessed looking at 1000 new dwellings in 2008 and was included in the December 2008 SA. Further work was done in December 2009 to look at the implications of 2000 dwellings. This is included at Appendix 8 and the reasons for choices set out in Appendix 6 as it is background to the final spatial distribution now included in the policies assessed in this SA.

As there have been a number of iterations in the development of the policies, Appendix 6 summarises the choices made in the light of SA and other considerations.

#### Stage C: Preparing the Sustainability Appraisal Report

Regular discussions took place with SCDC staff to help refine understanding of policies to assist their appraisal in terms of sustainability. Previous SA Reports on the Core Strategy Policies and development management policies have already been considered by Suffolk Coastal District Council and the changes made are recorded in Appendix 5. This report looks at the sustainability of the Core Strategy and Development Management Policies and has been produced to go out with the DPD for public consultation.

#### Stage D: Consulting on the draft DPDs and Sustainability Appraisal Report

SCDC has consulted with the public, statutory consultees, stakeholders and other interested parties on the Sustainability Appraisal for the Core Strategy and Development Management policies on the following occasions:

December 2008 SA of Core Strategy and Development Policies (Preferred options).

September 2009 SA of Housing Distribution – Updated Preferred Option

November 2010 SA of Revised Core Strategy and Development Policies

October 2011 SA of Revised Core Strategy and Development Policies

Comments received on these documents have been taken into consideration when finalising the plan policies.

#### 3.2 When the Sustainability Appraisal was carried out

The SA was carried out in June 2011 and updated in August 2011 and again in November 2011 following 6 weeks consultation on just the SA.

#### 3.3 Who carried out the Sustainability Appraisal

This sustainability appraisal update was carried out by Business Development staff in Resource Management having been assisted with previous drafts by an Ecologist,



Landscape officer, SEA officer and Archaeologist in Environment & Transport (now Environment, Skills and Economy) at Suffolk County Council.

#### 3.4 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. Following the responses, the document was updated and went out to a second period of consultation in June 2006. Only two responses were received, as shown in October 2008 SA Appendix 2.

Whilst most recommendations were acted upon in the updated June 2006 Scoping Report, a few were not. The June SA has carried out more of the recommendations including the scoping of the documents recommended by the Environment Agency which are now available, i.e. the East Suffolk Catchment Flood Management Plan and PPS25, 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.

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

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 October 2008 SA Appendix 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.

A further consultation on the October 2008 SA took place when it was published in December 2008. The response to responses received is set out in Table 3.2.

*Table 3.2: Response to responses received on SA December 2008*

<b>Ref.</b>	<b>Comments</b>	<b>Response</b>
1164	<b>Mr D Rose - Mersea Homes Ltd</b> Lack of reference to testing alternatives.	Reference added in updated SA.
1164	<b>Mr D Rose - Mersea Homes Ltd</b> SP4 Felixstowe: Need to SA dispersed growth option identifying actual sites before include as a Preferred option in the Core Strategy.	Strategic site appraisal has since been completed for larger sites and different growth scenarios.
1164	<b>Mr D Rose - Mersea Homes Ltd</b> SP4 Felixstowe: Concern about use of agricultural land quality as a criteria for assessment and request for SA to use criteria in SP1.	The SA framework agreed following consultation with statutory agencies has to be used for the appraisal. PPS9 states that where possible the best and most versatile agricultural land should be protected.
1164	<b>Mr D Rose - Mersea Homes Ltd</b> SP4 Felixstowe: Locations of dispersed growth have not been identified so it is not possible to complete an adequate sustainability appraisal.	The concept of distributed growth on small sites has been tested as an option and compared with concentration in larger sites. This is adequate at the strategic level.
1164	<b>Mr D Rose - Mersea Homes Ltd</b> SP4 Felixstowe: Lack of consistency in the application of the appraisal methodology.	The SA framework has been used and ODPM guidance followed, to the best of our ability.
0768	<b>Mr Maydo Pitt - GO- East</b> As DPD progresses it would be helpful to include details about how each of the site alternatives perform in relation to SA together with clear referencing and linkage to more detailed evidence.	Noted and subsequently published.
0012	<b>Ms Rose Freeman - The Theatres Trust</b> SP1 Sustainable development. Not consulted on Scoping Report so unable to suggest cultural activities, other than sport and recreation are included in the SA. Baseline does not include contribution cultural activities make to sustainable communities. Core Strategy is therefore unable to include guidance on protection and encouragement of cultural provision.	SA8 To improve the quality of where people live includes: Will it improve access to cultural facilities? with 3 indicators relating to the use of museums. Broader data is limited. The Development Management policies include policies to protect key facilities and public buildings.
0824	<b>Mrs Pat Williams - Natural England</b> Supports SA recognition of possible impacts on the AONB	Noted.
0822	<b>Mr Andrew Hunter - Environment Agency</b> Quality of the maps is poor and should be improved for final submission stage. Description of baseline characteristics for Suffolk Coastal area could be improved upon with use of graphs, charts and maps for representing data and information. SA does not get to grip with the likely evolution of the area without the plan based on existing plans, trends and practices.	Noted. Maps will be improved. Noted. Baseline has been updated and more graphs and charts used.  Noted. Predicted future baseline section has been strengthened.

Following the public consultation on the Reviewed Core Strategy in November 2010 comments shown in Table 3.3 were received. The responses to these comments are recorded in the table and none of them have resulted in changes to the appraisal although some issues of concern to residents have been noted in the baseline and issues section.

*Table 3.3 Response to responses received on the Reviewed Core Strategy SA (Nov 2010)*

<b>RepID</b>	<b>Comments</b>	<b>Response</b>
2134	<p><b>Mr James Barclay- OBJECT</b> Paper -21/01/11 The sustainability appraisal raises concerns about the proximity of the BT proposed development to the River Deben SPA. The river itself is a designated Ramsar wetland site. The River Deben and its surrounds is also an AONB. Natural England's comment on policy SP3 is that any development could have a particularly negative impact on the Deben Estuary SPA/SSI.</p>	<p>The SA identifies this point and suggests that mitigation of negative impacts will need to be addressed. This is reflected in the Core Strategy. No change required</p>
2459	<p><b>Mr Tim Elliott - OBJECT</b> Email - 24/01/11 Reviewed Core Strategy &amp; Development Management Policies - Supporting Documents: Sustainability Appraisal - Nov 2010 SCDC has failed to rework its previous Sustainability Assessment, despite the occurrence of significant changes - for just one example, to transport provision (axing of bus services cannot be considered "insignificant"; nor can the transport finding that the Orwell Bridge will reach full capacity by 2014).</p>	<p>At the time of the reassessment no decision on the axing of bus services had been made. Alternatives to scheduled sponsored services (Demand responsive transport) are well developed in Suffolk Coastal and are looking at how they plug gaps that may occur should services be withdrawn. SP11 pledges to improve the quality and quantity of the public transport service on offer. The capacity issues of the A14 are recognised in the plan and SP10 seeks to address the issues so it does not become a limiting factor to development in Suffolk Coastal. No change required.</p>
2583	<p><b>SNR Denton (Mr Matthew Evans) – COMMENT</b> Email - 21/01/11 The Sustainability Appraisal of the RCS also undermines the support for the allocation at Martlesham Heath. The appraisal states: "However, there are strong negatives for...the Area East of Ipswich, as the preferred option has been determined as being to utilise the land abutting Adastral Park and close to the Deben Estuary, an area thought to be less environmentally sustainable for this degree of development (and borne out through separate strategic site assessment)."</p>	<p>The SA identifies this point and suggests that mitigation of negative impacts will need to be addressed. This is reflected in the Core Strategy. No change to SA required.</p>
2956	<p><b>Deborah Branch - OBJECT</b> Email - 22/01/11 I do not consider a sufficient sustainability appraisal of all the options has taken place with regard to the allocation of homes within the Ipswich Policy Area.</p>	<p>An SA has been completed on a wide range of strategic site options and reported in the 2008 SA for the Preferred options. No change to SA required.</p>
3157	<p><b>Savills (Colin Campbell) [2448] - COMMENT</b> Email - 23/01/11 We have significant concerns regarding the sustainability appraisal. The SEA directive and the</p>	<p>2008 SA for Preferred Options considered alternatives and a</p>

	<p>regulations require that the SA considers reasonable alternatives. There is no assessment presented within the SA of the reasonable alternatives to the housing figure. We consider the assessment which has taken place to be superficial and too simplistic.</p> <p>The SA tends to identify more housing as having negative environmental effects, a point with which we disagree.</p> <p>The SA is weak in considering social and economic impacts. Nowhere does it assess impacts of lower levels of house building on affordability or social exclusion. OE's advice says providing a lower level of house building will result in fewer affordable homes and lower prosperity and economic growth.</p>	<p>summary of what has since been agreed is now included in this updated SA.</p> <p>Noted. The agreed SA framework has been used in the appraisal.</p> <p>Noted. The SA framework covers environmental, economic and social impacts. Alternative levels of housing building have been assessed.</p>
3354	<p><b>Mr Ian Kay [282] - OBJECT</b> Email - 22/01/11</p> <p>The Sustainability Appraisal should have been re-written in the light of the potentially significant changes to the LDF Core Strategy. Admittedly, very little has actually changed, but that is not the point - the removal of the RSS has opened up many new possibilities which should have been evaluated for sustainability. For example, the constraints on the housing numbers and their distribution between the IPA [now the EIPA] and the rest of the district have been completely removed. No assessment of the sustainability of a more even housing distribution or a variety of different overall housing numbers has been done.</p>	<p>Noted. New options for housing pending the abolition of the RSS have not been presented for appraisal. The Council has looked at the new evidence gathered and decided on an appropriate housing number and distribution.</p> <p>No change to the SA required.</p>
3385	<p><b>Richard Buxton - Environmental &amp; Public Law (Mr Richard Buxton) [2467] - OBJECT</b> Email - 24/02/11</p> <p>The points relate to legal procedure rather than comments on the merits of the matter. We thought it would be helpful to draw to your attention our view that there are serious problems with the consultation. They relate to the way the council has (or rather has not) followed the requirements of EU law, in particular the Strategic Environmental Assessment (SEA) Directive 2001/42/EEC and the Habitats Directive 92/43/EEC. These are of course both implemented in domestic law but it is convenient to refer to them as such.</p>	<p>Noted. It is considered that that the SA framework fulfils the requirements of SEA and this framework has been the subject of public consultation.</p> <p>No change to the SA required.</p>
3407	<p><b>No Adastral New Town (NANT) (Ms Janet Elliot) [2470] - OBJECT</b> Email - 23/01/11</p> <p>The Council's own SA found that increasing the number of houses within the IPA to be a less sustainable option than the previously worded policy, which proposed just over 1000 homes.</p> <p>We do not think it is NANT's role at this stage to assess the specific merits of the other four strategic options for housing within the IPA. However, we express grave concern that these</p>	<p>Agreed.</p> <p>Noted. The strategic site options were previously analysed and presented in the December 2008 consultation. This SA includes a</p>

	sites were not properly assessed at the appropriate stage and it is not clear why they have been discounted. We say that the reasonable alternatives identified within the Preferred Options Consultation Document have not been properly considered.	summary of the reasons for choice between alternatives considered.
3718	<b>Bidwells (Mr Glyn Davies) [545] - COMMENT</b> Paper - 21/01/11 We do not agree with the findings of the Sustainability Appraisal that this is the most sustainable pattern for future growth in the Eastern Ipswich Plan Area and feel that the Council's approach of placing all its eggs in one basket is not the hallmark of a sound Development Plan Document, particularly given the inability of this location to deliver housing during the early part of the plan period.	Noted. The proposed policies seek to control the sustainability issues that might arise through the proposed distribution of houses.  No change to SA required.
3574	<b>Waldringfield Parish Council (Mrs Jean Potter) – OBJECT</b> SP2 Housing numbers. Disagrees that concentration of development in the IPA is more sustainable.  SP3 New housing. Disputes that the sustainability of this policy has improved over various iterations of the plan.  SP8 Tourism. No mention is made of the damaging effect 2,000 houses in the EIPA could have on local tourism, particularly a caravan site a few meters from a proposed housing site.  SP20 Ipswich Policy Area. Disputes the description of the reduction of sustainability of SP20 as marginal and considers it significant. Not certain that Foxhall tip will be restored to a country park since the County Council is currently ceasing to fund such parks.  SP21 Felixstowe. The increase in housing allocation should reduce the sustainability of the policy.	Noted but for larger scale development location near existing infrastructure is more cost and resource efficient. The sustainability has not improved since the 2008 version and remains negative.  Noted for the update of the strategic site appraisal however there is a need to balance strategic development needs of the District.  The policy became marginally more sustainable but remains barely sustainable in our view. Noted and this would be a real concern. Alternative funding would need to be found if substantial new housing was located in the east Ipswich area to remove the threat of damage to the integrity of the Deben SPA. More houses do not automatically mean reduced sustainability depending on the links to existing infrastructure.

Further comments were received from Richard Buxton (Environmental and Public Law) before the Suffolk Coastal Cabinet meeting on 6 July 2010. This pointed out difficulties in finding the information on the appraisal of preferred options and highlighted a couple of inconsistencies in the SA text regarding publication of documents. Further information on the appraisal of alternatives has been added to this document and the 2007 SA published to eradicate what might appear to be inconsistent comments.

Suffolk Coastal's [Reviewed Core Strategy](#) was considered by Full Council on 27 July 2011 when it was resolved to progress the document subject to the Sustainability Appraisal and Appropriate Assessment documents being updated and put out to public consultation. A six week consultation period, during which comments were invited on the updated documents, ran from 30 August to 14 October 2011. A total of 220 comments were made on the SA of

which 155 were objections and of these 16 were simple objections with no reason or just inadequate being given as the reason. Several objections referred to previous objections made on the content of the Core Strategy and not specifically on the SA. It is for the Core Strategy to consider and react to such objections. Any changes made to the Core Strategy are then assessed by the SA, but it is not the role of the SA to respond to objections on the Core Strategy. Due to the volume of responses received it is felt to be more helpful to understanding this SA to group responses by issue and record the response to the issue raised. Table 3.4 summarises the responses received and records the updating that has subsequently been made to the SA.

*Table 3.4 – Key issues raised and responses to October 2011 consultation*

<b>SA Issue:</b>	<b>Response:</b>
1. The SA has not addressed matters previously raised in consultation and the responses have been insufficient	Several of the objections are about previous comments made on the Core Strategy. Those comments are taken into account in the revision of the plan. The amended plan is then reappraised for its sustainability. SA is iterative and consultation on the SA has occurred numerous times over the past 4 years and all responses have been fully considered and changes made as relevant and documented.
2. Many of the concerns for potential adverse impact (traffic, environment, infrastructure etc) have been dismissed too easily or left for mitigation to resolve	It is difficult to gauge the severity of impact in specific areas and the SA is intended to give a strategic view. It is reasonable to suggest mitigation to reduce adverse impacts to an acceptable level.
3. The overall methodology used for undertaking the SA is insufficient and confusing	The methodology for producing the SA document is set out in national guidance and SA Framework produced in partnership with all the Suffolk planning authorities. It is difficult to include all the relevant information from previous iterations. Some clarification of terminology has been added.
4. Many of the conclusions include a high degree of subjectivity	The SA document has been produced giving consideration to the best available information. The assessment of predicted impacts have been conducted based upon professional judgement taking into account the best available evidence at the time. This is consistent with the national practical guidance on producing a Strategic Environmental Assessment.
5. The document contains many contradictions and flaws in reasoning	The SA has been carried out with regard to the national practical guidance on producing a Strategic Environmental Assessment. Objectives and policies have to satisfy competing interests. SA seeks to highlight potential conflicts so that they can be minimised where possible.
6. The full extent of traffic generation impacts has not been considered – congestion, noise concerns about the A12 and A14, capacity of the Orwell Bridge, air quality etc	Transport issues have been taken into account in the SA. The role of the document is considering District Core Strategy policies and is proportionate to this - some issues will have been

SA Issue:	Response:
	considered in the Local Transport Plan SA. Strategic issues concerning congestion, noise and air quality have been highlighted. Matters of specific impact must be examined in detail in Action Plans or in considering specific planning applications.
7. The baseline data used is inaccurate or inadequate (e.g. no consideration of boats)	The baseline data has sought to gather information from the latest reliable available, usually Government published data or from local surveys. Growth in the use of boats on the estuaries is considered in the AA and to some extent would be controlled by the granting of planning permission for marinas and on land storage.
8. Further consideration needs to be given to the impact of freight by rail. Data from the 2007 Public Inquiry into the Felixstowe Branch Line could be used.	The SA has considered the impacts of freight by rail and strategically it is regarded as a positive outcome as it will help to reduce freight on the roads e.g. pages 59/60 of the SA document. It has also been considered as an indicator for the SA objective 22.
9. The SA gives inappropriate weight to out of date reports and data	The SA document has been produced giving consideration to the best available information and the assessment of predicted impacts using professional judgement.
10. The evidence base and baseline data would benefit from including more information to demonstrate that the historic environment and cultural assets have been suitably considered	Additional information has been added to the baseline section. Concerns about the protection of historic assets in the plan have already been highlighted by the SA.
11. The SA does not go into enough depth regarding analysis of impacts and mitigation required – it devolves this down to other documents and processes	The SA has been undertaken at a strategic level appropriate to a strategic planning document. It is appropriate that the matters of detail should be considered in documents dealing with detail such as Area Action Plans or individual planning applications.
12. The SA has not considered sufficient alternative options for housing, across the district and in the Ipswich Policy Area	<p>The development of the Core Strategy policy options has been an iterative process, a summary of which is provided in Appendix 6 of the SA. A range of options have been considered in relation to the overall housing requirements and the distribution across the district.</p> <p>The Council decided early on that it preferred one, or at most two strategic sites in order to best deliver infrastructure, as well as the principle to seek to locate new housing close to new jobs. Consideration of further options were then made in this context.</p>
13. The mitigation required to compensate for environmental damage is insufficient	Proposed mitigation has been considered in the context of the evidence base and is thought sufficient to reduce possible adverse impacts to an acceptable level. A wide range of statutory

SA Issue:	Response:
	consultation bodies, including Natural England, Environment Agency and English Heritage have been engaged in the process, and have expressed their general satisfaction with the mitigation proposed.
14. The mitigation of recreational impacts from new development at Martlesham will need to apply to both the Deben estuary and the Suffolk Sandlings area	Noted. The Appropriate Assessment acknowledges this. Mitigation proposals will be expected to be considered for both Deben and Sandlings areas.
15. There is confusion regarding the role of Foxhall Country Park - the SA notes that it is not likely to be delivered in the plan period but policy SP20 has become more sustainable.	This has been clarified in the text. The policy became marginally more sustainable because it specified that it would seek to preserve and enhance environmentally sensitive locations in the area and notes the creation of a countryside park on the Foxhall tip by the end of the plan period. The SA pointed out that the Foxhall Tip Country Park, is a long term proposal which may be delivered outside of the plan period (ie. after 2027). Landfill has since ceased due to market conditions and it is now just as possible that it could become available earlier. However the SA suggested open space will need to be provided as part of any housing development in the East Ipswich area to meet immediate recreational needs, prior to the Country Park being available and to fully justify the improved sustainability opinion.
16. Development will put excess pressure on water resources which is not adequately recognised	The SA has had due consideration to pressures on water resources and relevant evidence base documents such as the Haven Gateway Water Cycle Study have informed this process. Further clarification has been made, particularly to the baseline data and policy assessment tables to help demonstrate water impacts have been explicitly considered.

### 3.5 Difficulties encountered

In the course of undertaking the SA for the Core Strategy the baseline data has been updated several times. This has changed the situation on some criteria but the same SA framework has been used for consistency. The concept of urban cooling was a late addition to the plan, too late for the SA framework to be updated.

At the Preferred Policies stage, some of the policies assessed did not have options. In some cases 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 new approach (so continuation of existing trends would be unrealistic). There have now been several iterations of the SA so that lists of changes need to be included to ensure an audit trail is provided. These help illustrate the difference the process has made to the plan preparation.



## 4. State of the Environment in Suffolk Coastal

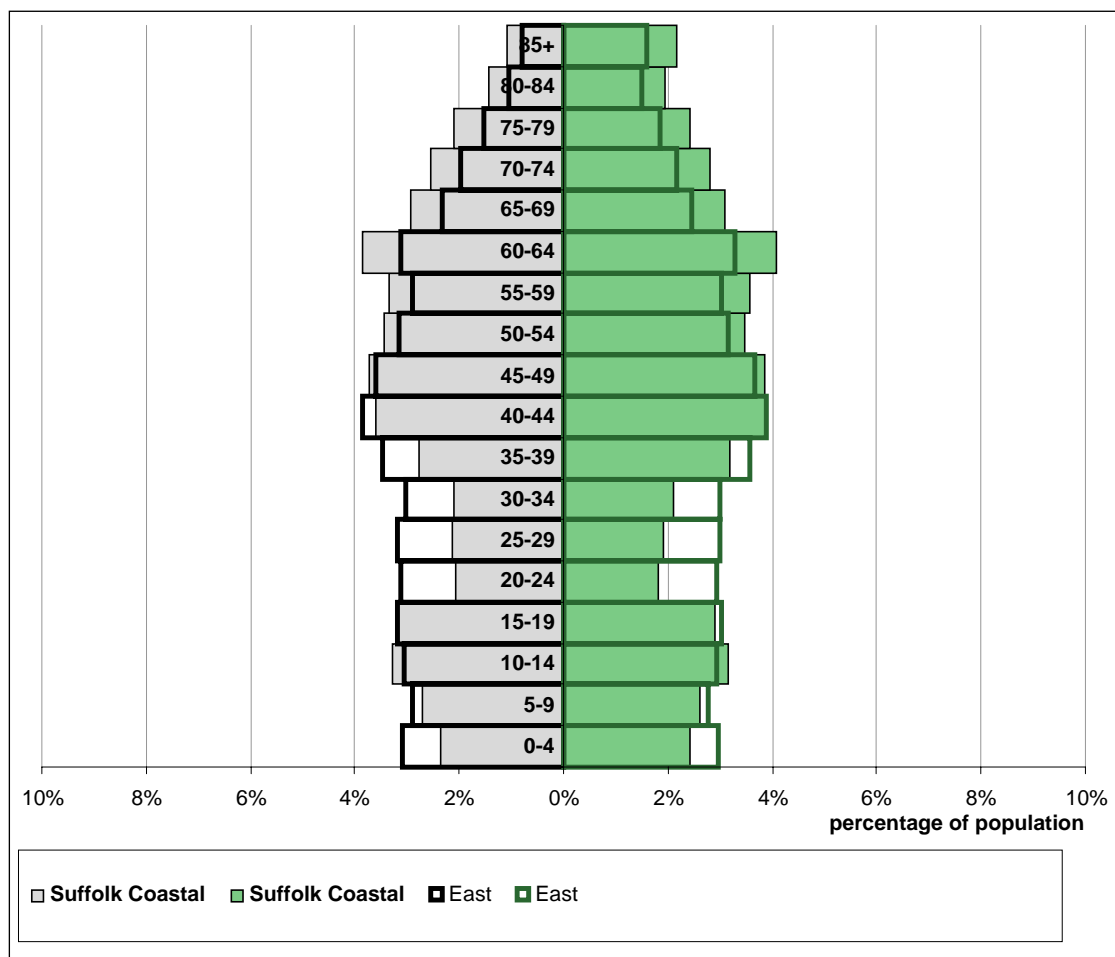
### 4.1 Description of baseline characteristics

#### Demographics

In 2009, the population of Suffolk Coastal was 124,100, which is 17.3% of the 714,000 population of Suffolk (ONS, 2009 Mid Year Estimate). The average population density for Suffolk is relatively low at 188 people per square kilometre (compared to the average for England of 397 per square kilometre).

Figure 4.1 shows how different its age pyramid is to the average for the East of England. In 2009 it has more than the average numbers of people in the older age groups and many fewer 20-35 year olds. In the last 10 years deaths have exceeded births in the District.

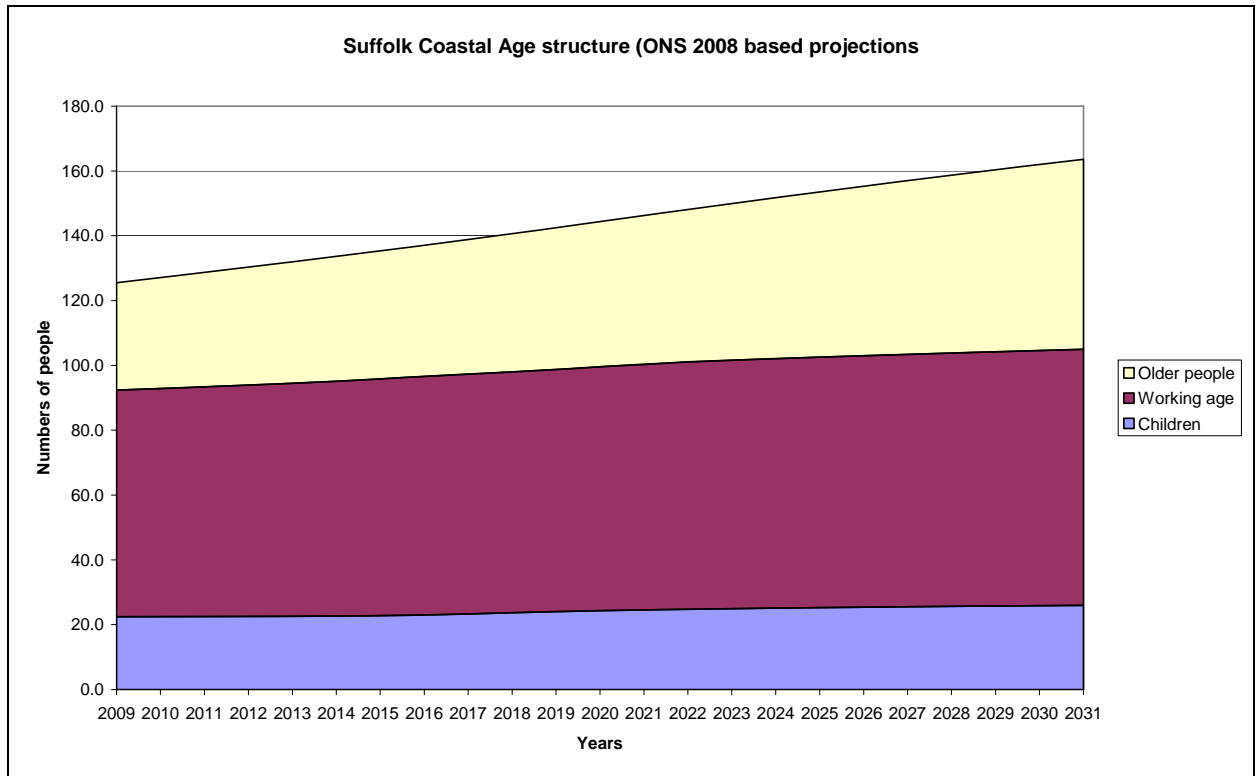
Figure 4.1: Age structure of Suffolk Coastal ONS Mid 2009 estimate



It is predicted that from 2009, the population of Suffolk will grow by 106,600 (15%) by 2031 (EEFM, 2010). It is expected that 21% of this growth (around 38,000 people) will be located in the Suffolk Coastal District and most of it will come from in-migration.

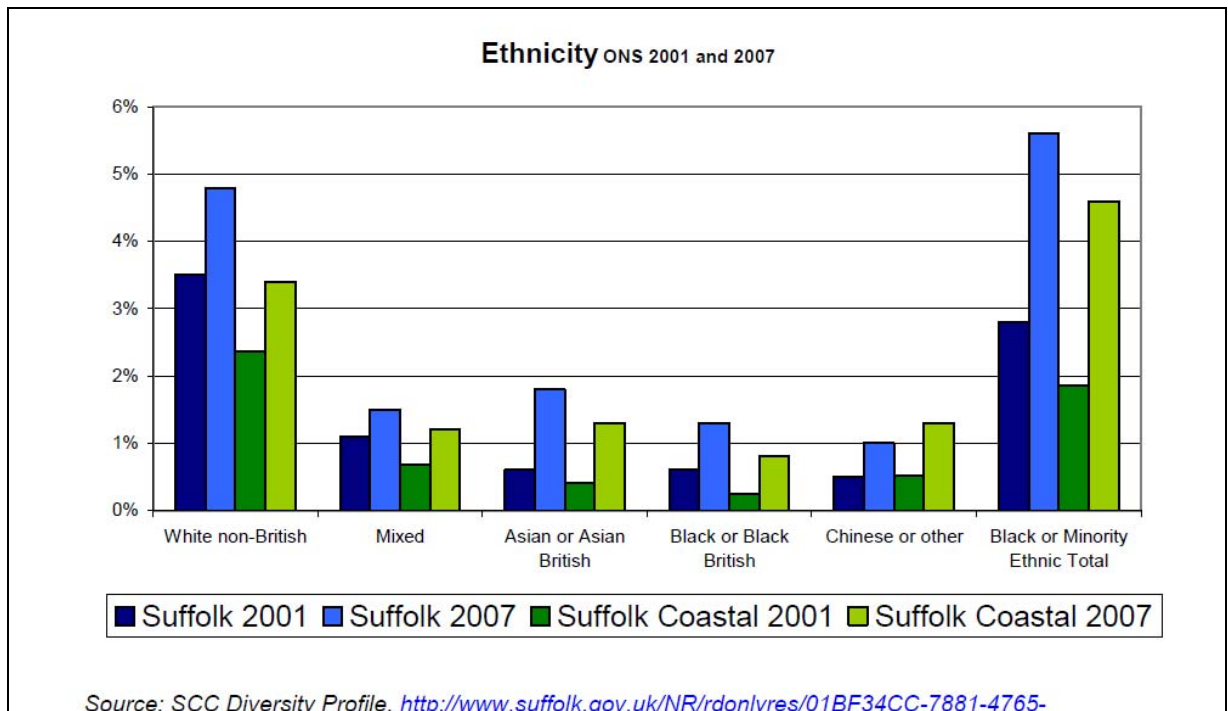
The age structure of the population in Suffolk Coastal is also predicted to change. Figure 4.2 shows the rate of change from 2009 up to 2031, with children (0-15 year olds) growing only slightly 16%, working age (16 to 64/59) 13% and over 60/59 year olds by 77%.

Figure 4.2 Change in age structure 2009-2031



In 2001, 95.79% of the Suffolk Coastal population was white British, compared to the Suffolk figure of 93.75%. 0.41% of the population were Asian, where 0.25% was Black and 0.35% was Chinese. Figure 4.3 below shows how the ethnicity has changed over time (based on the ONS 2006 estimates), becoming more diverse.

Figure 4.3: Ethnicity – Suffolk Coastal and Suffolk



Source: SCC Diversity Profile. <http://www.suffolk.gov.uk/NR/rdonlyres/01BF34CC-7881-4765->

The number of new NI registrations for Suffolk Coastal is shown in Table 4.1 below. Suffolk Coastal had the second highest rate of new national insurance registrations being employed out of all the LAs in Suffolk. This could in part be due to seasonal agricultural workers and the presence of the international employer British Telecom that has strong links with India.

*Table 4.1: NI registrations*

Proportion of population who are overseas nationals from the Accession 8 countries that have newly registered for National Insurance numbers								
	Babergh	Forest Heath	Ipswich	Mid Suffolk	National Average	St. Edmundsbury	Suffolk Coastal	Waveney
2007	0.20	0.69	0.66	0.16	0.50	0.38	0.34	0.14

Source: Local Knowledge; National Insurance Number Registrations in respect of non-UK Nationals in 2006/07 by Local Authority and country of origin

### **Housing**

According to the Reviewed Core Strategy, 7,590 new homes are to be built between 2010 and 2027 in Suffolk Coastal. Recently Suffolk Coastal has experienced considerable growth, completing 5,350 dwellings between 2001 and 2010. There were 107 affordable houses completed in 2209/10 (42% of the total completions, compared to 113 in 2009, 50 in 2008 and 52 in 2007. The average household size in the district is 2.31 persons (Census, 2001).

For 2009/10, Suffolk Coastal District Council has reported 66% of housing completions on Previously Developed Land (PDL). However, as stated in the Reviewed Core Strategy, there are a limited number (230) of PDL opportunities identified for future building which will result in the need for additional greenfield allocations.

In 2010 the income to house price ratio for Suffolk Coastal was 8.31. This is higher than the Suffolk average, hence suggesting that Suffolk Coastal DC is one of the least affordable areas of Suffolk in which to live, second only to Babergh.

Suffolk Coastal has no Local Authority housing stock, however at 2009 the RSL stock for the district was 6,228, 13% of Suffolk's total RSL/ LA stock. None of these units are considered unfit. (ONS, 2009).

In order to make efficient use of land the Government guidance is that development should normally be between 30 to 50 dwellings per hectare. Suffolk Coastal were ranked 3<sup>rd</sup> out of Suffolk LA's in terms of density completions, completing 60.5% of 2007-8 completions at more than 30 dwellings per hectare. It is noted that the government requirement for minimum density no longer exists.

### **Deprivation**

All LAs in Suffolk have become relatively more deprived in the 2010 ranking compared to 2007. Suffolk Coastal District is still in the second least deprived 20% of Districts and much of the area has improved relative to other areas. It has no areas which rank within the worst quintile nationally (see Figure 4.4); however the peninsula of Felixstowe is within the second most deprived quintile. All other areas of the district are considered comfortable, hence deprivation is not so much of an issue here than in other areas of the county.

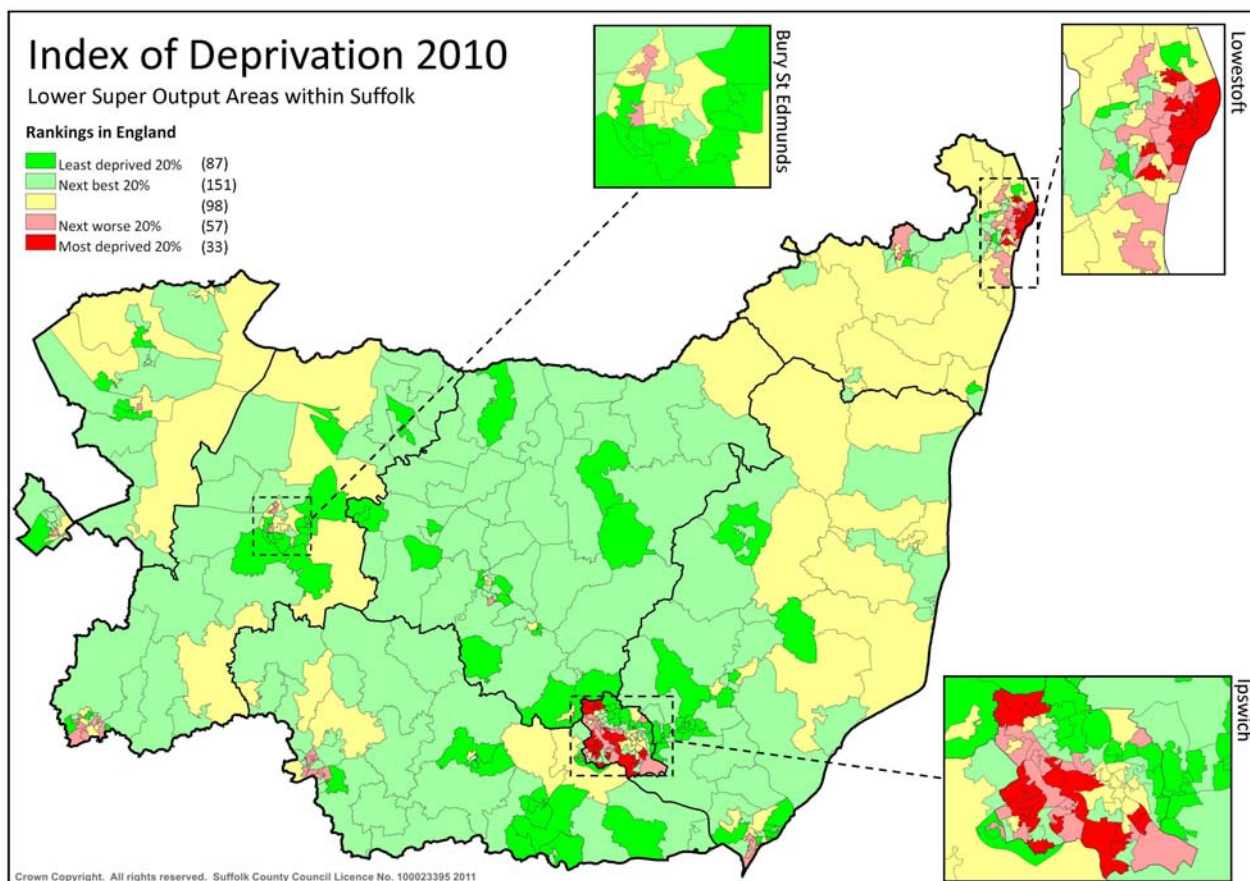


Figure 4.4 Index of Multiple Deprivation 2010

The OCSI Deprivation report based on the 2004 Indices of Multiple Deprivation (IMD) focussed on deprivation affecting rural areas. This report suggested that pockets of Suffolk Coastal are in the worst 10-20% of Lower Super Output Areas (LSOA's) in the East of England in deprivation terms, for example in Felixstowe, Saxmundham and Leiston and between Woodbridge and Aldeburgh, as well as areas surrounding Halesworth such as Huntingfield and Heveningham. Least deprived areas are generally towards the south west of the district and towards Ipswich.

### Health

As reported in the July 2010 [Health Profile for Suffolk Coastal](#) and shown in Figure 4.5, the health of people in Suffolk Coastal is generally better than the England average. Many indicators including life expectancy for males and females, deaths from smoking, early deaths from cancer, heart disease and stroke, and violent crime are better than the average. However, the rate of physical activity in schools is significantly worse than the England average.

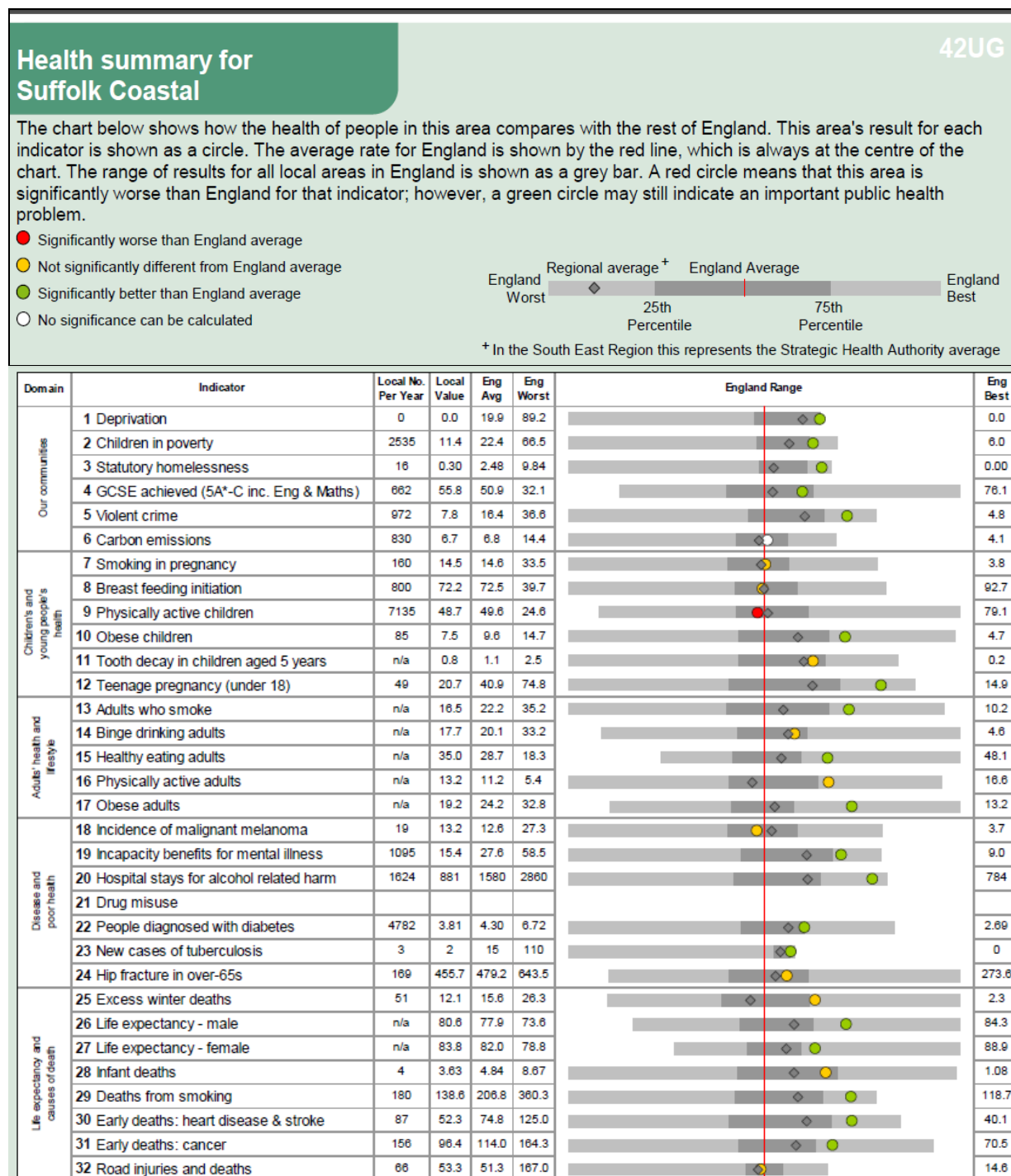
Over the past ten years, rates of death from all causes for men and women and rates of early death from cancer and from heart disease and stroke have improved in Suffolk Coastal, and remain better than the England average. Rates of breast feeding initiation and smoking in pregnancy are in line with the England average. There were 49 teenage pregnancies in 2009, a rate of 20.7 per 1,000, compared to the English average of 20.9.

In terms of child poverty as measured by the proportion of children living in families in receipt of out of work benefits or tax credits where their reported income is less than 60% median income, there are only three small areas in Suffolk Coastal where such families exceed 20% of total families. These pockets are in Woodbridge, Felixstowe and Leiston.

The latest data currently available shows that as at August 2008 14.7% (2007 15%) of children are in poverty in Suffolk compared to the England average of 20.9% (2007 21.6%).

Figure 4.5 – Health profile for Suffolk Coastal

Source: Department of Health 2010



The percentage of children in poverty ranges from 21.7% in Ipswich and 21.2% in Waveney to 9.2% in Mid Suffolk. Table 4.2 below shows the numbers of children involved in 2008 by District, showing that Suffolk Coastal does not stand out in any particular category but that there are 2,595 children living in poor families.

Children who grow up in poverty face a greater risk of having poor health, being exposed to crime and failing to reach their full potential. They often miss out on school trips, do not have adequate winter clothing and are unable to enjoy leisure activities with their peers. As a result, their education suffers - making it difficult to get the qualifications they need to move on to sustainable, well-paid jobs. This limits their potential to earn the money needed to support their own families in later life, creating a cycle of poverty.

**Table 4.2: Child poverty statistics**

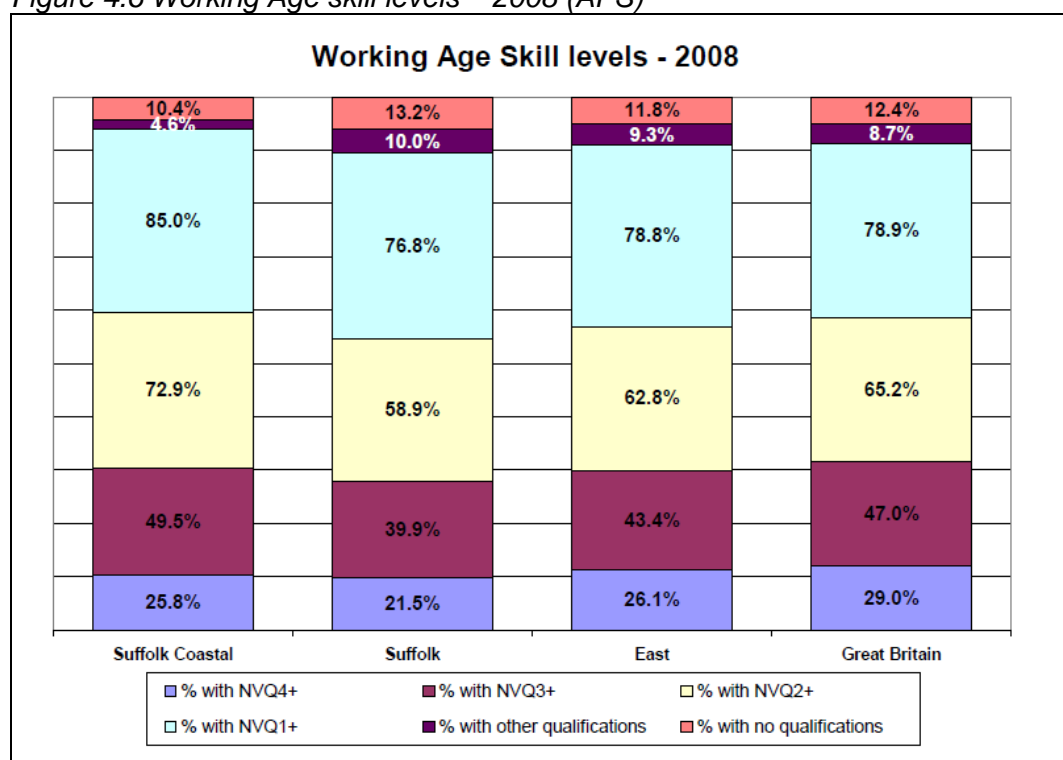
local Authority	Children in families in receipt of CTC (<60% median income) or IS/JSA		Of those in poverty			% of children in poverty	
			% under 16	% lone parent	% 4 or more children	Under 16	All children
2008	Under 16	All Children					
England	2,068,970	2,341,975	88.3	68.2	21.9	21.6%	20.9%
Suffolk	19,040	21,340	89.2	68.1	18.8	15.4%	14.7%
Babergh	1,870	2,085	89.7	68.2	18.9	12.2%	11.6%
Forest Heath	1,205	1,325	90.9	72.6	14.3	15.2%	14.5%
Ipswich	5,375	6,015	89.4	69.4	19.5	22.5%	21.7%
Mid Suffolk	1,625	1,820	89.3	65.4	19.7	9.7%	9.2%
St Edmundsbury	2,240	2,500	89.6	71.3	17.4	11.9%	11.4%
Suffolk Coastal	2,305	2,595	88.8	69.2	16.9	11.1%	10.5%
Waveney	4,415	4,995	88.4	64.4	20.2	22.0%	21.2%

Source: 3 spreadsheets [http://www.hmrc.gov.uk/stats/personal-tax-credits/child\\_poverty.htm](http://www.hmrc.gov.uk/stats/personal-tax-credits/child_poverty.htm)

### Education and Skills

Suffolk Coastal has a relatively low level of its population who have no qualifications, at 10.4% in 2008. This is better than the Suffolk average which is 13.4% and the averages for the east of England (11.8%) and Great Britain (12.4%). As Figure 4.6 shows Suffolk Coastal District has higher working age skill levels than the county as a whole, but is still below the national level.

**Figure 4.6 Working Age skill levels – 2008 (APS)**





In 2010, 55.8% of students in Suffolk Coastal continued into Higher Education after A levels, this being the highest proportion of any District in Suffolk.

The employment rate in 2010 for Suffolk was 73.9%, and for Suffolk Coastal it was 76.7%, slightly higher than the county average, and second highest in Suffolk, behind Forest Heath at 79.7%.

In terms of attainment, A level students scored an average of 725 in Suffolk Coastal, compared to the Suffolk average of 743.6 points.

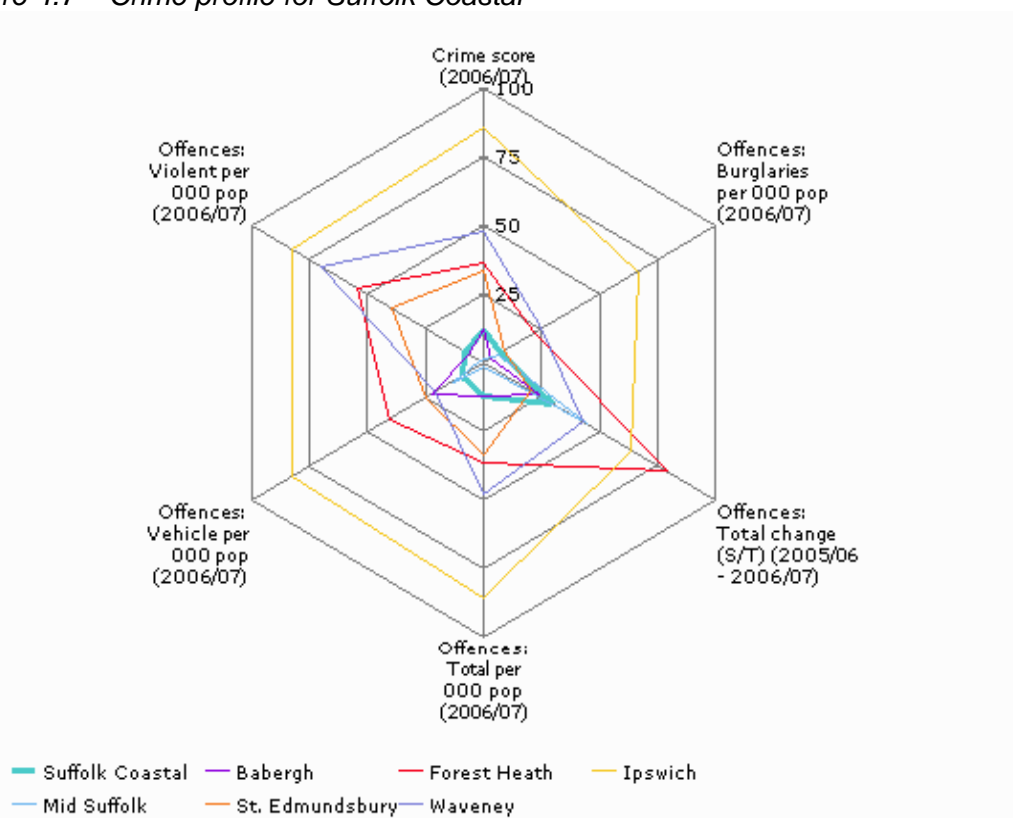
At GCSE level, 68.5% of Suffolk Coastal pupils achieved 5 or more GCSE grades at A\* - C, higher than the county (64.4%, regional (59.9%) and national (57.1%) averages. Also in Suffolk Coastal 4% of children reached at least level four, compared to 81.6% regionally and 80.4% nationally.

### Crime

According to 2008/09 data, at 66 offences per 1,000 people, the overall crime rate in Suffolk is well below regional (70) and national (87) averages, as are the rates for burglary and violent crime. Results from the British Crime Survey show 11% of Suffolk residents perceive local levels of disorder to be high, compared with 14% and 17% regionally and nationally. According to the Suffolk Place survey in 2008, 92% of residents feel safe outside during the day falling to 58% after dark.

Suffolk Coastal is in the best 20% of authorities in Suffolk, the Eastern region and nationally using the crime indicators displayed in the graph below.

Figure 4.7 – Crime profile for Suffolk Coastal



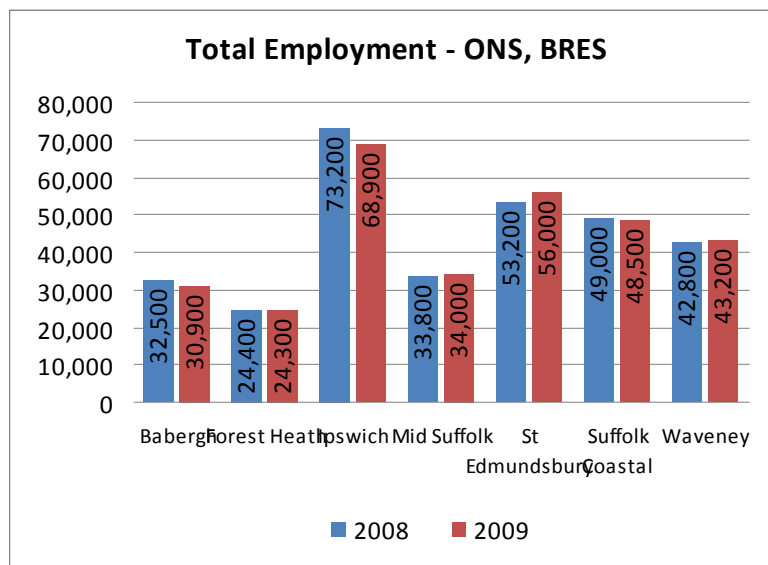
Note: The chart displays the national ranking converted to a percentile score (The national average is always 50. Results above 50 (i.e. on the outside of the profile) are above the national median average and vice-versa below 50) For this profile, it is better to score low on each indicator (i.e. have a shape towards the centre).

## Employment/Economy

According to the ABI, workplace employment in Suffolk Coastal has decreased slightly between 2006 and 2007 by 243 (less than -0.5%). This followed increases each year for the period 2003-2006. These decreases in employment are reflected at a county level, with overall employment in Suffolk decreasing by 2.5% according to the ABI.

The way jobs are monitored has changed from the Annual Business Inquiry (ABI) to the Business Register and Employment Survey (BRES). The BRES estimates show a 1% fall in employment in Suffolk from 2008 to 2009 to 305,700. Ipswich saw by far the largest fall in employment in this period, with 4,300 jobs estimated to have been lost whilst a small drop of 500 was seen in Suffolk Coastal as show in Figure 4.8.

Figure 4.8: Total employment 2008-2009



This trend is echoed by the annual population survey, which suggests steady increase in the number of employed residents for the period 2006-2009 with a slowing more recently reflecting the recession.

According to the BRES, the most prominent sectors of employment in Suffolk Coastal in 2009 were transport and communications (17%), Retail (11%), and the public sector (including health and education) (23%). The prominence of the transport sector in Suffolk Coastal can be linked to the employment provided by the Port of Felixstowe, and related activities.

Unemployment in Suffolk Coastal is currently at 7.1% according to the September 2010 Annual Population Survey (Suffolk 6.6%). This is an increase on the September 2007 figure of 1.6%. Indeed, Suffolk Coastal has the third highest unemployment rate in Suffolk, after Ipswich (9.3%) and St Edmundsbury (9.3%).

JSA Claimant Count levels in Suffolk Coastal accelerated towards the end of 2008 But since then have fallen back and are now less than 1500 (March 2011).

Suffolk Coastal consistently has the highest median weekly earnings of the districts in Suffolk at £515 in 2010, compared with the Suffolk average of £478.1.

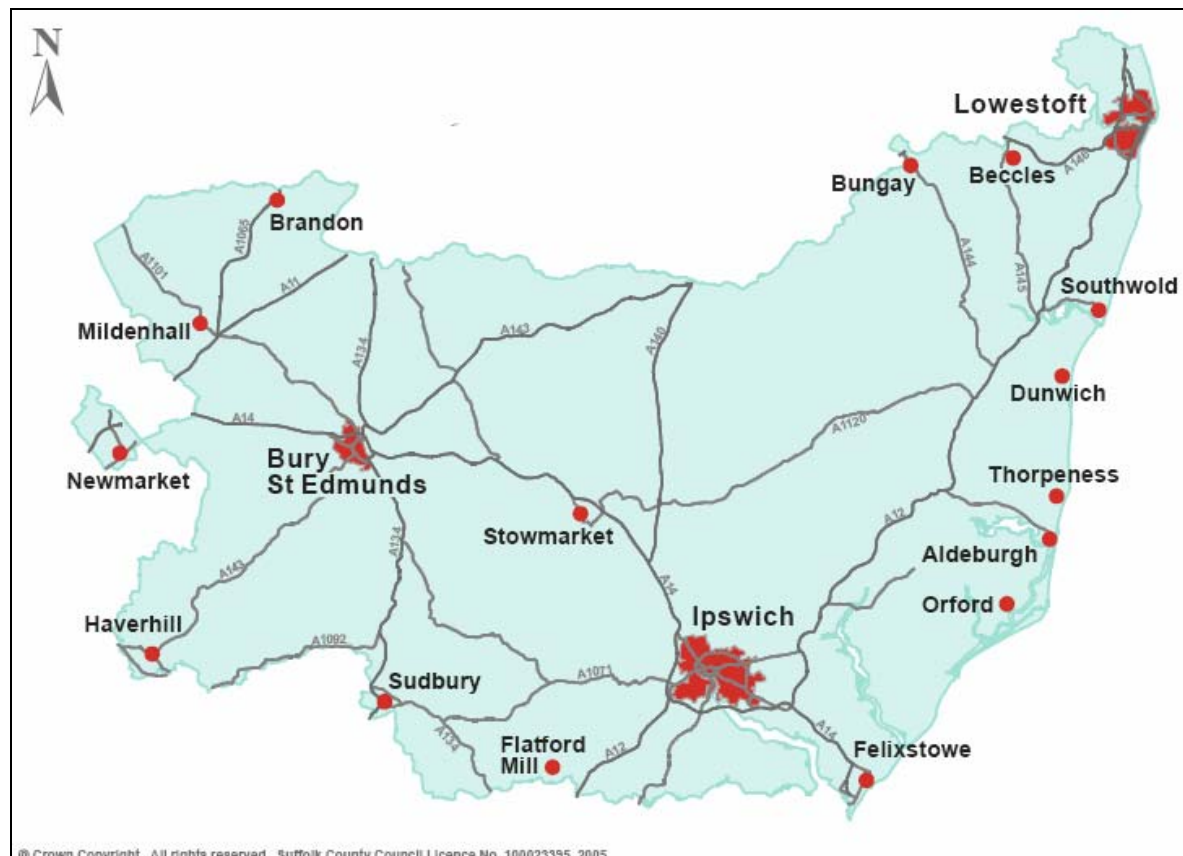


## Transport

In 2001, 61% of Suffolk residents drove to work, 10% worked at home and 21% used a sustainable means of transport (public transport, cycling or on foot). In 2006, 66.8% of schoolchildren travelled to school by sustainable means, above the 65% target.

In Suffolk Coastal, the Local Transport Plan 2011 suggests that various settlements in Suffolk Coastal currently suffer from congestion issues linked to seasonal tourism. Traffic has grown about 4% since 2000 in Suffolk Coastal, just above the Suffolk average. However as with the rest of Suffolk the rate of traffic growth as reduced in last two years. It is noted in Highways Agency research (A14 Girton to Felixstowe congestion study 2005) that the A14 could reach capacity by 2014 on the Orwell Bridge, however due to the recession and slow down in economic growth this might now be an overly pessimistic.

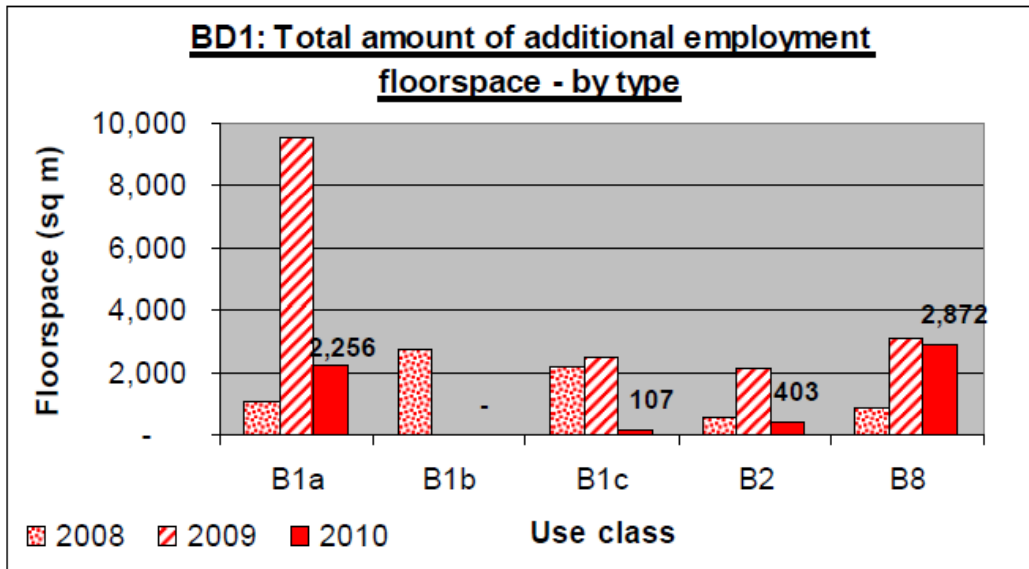
Figure 4.9 – Congestion in Suffolk



## Retail and Employment Land

The amount of employment floorspace developed in Suffolk Coastal (B1 – B8 uses) has reduced significantly during 2010 in comparison to the previous year. Most recently the district has primarily experienced employment office floorspace development (B1a). The majority of employment completions are attributed to previously development land (brownfield).

Figure 4.10: Employment floorspace in Suffolk Coastal Source: SCDC AMR 2010



\* 2010 B8 figure excludes 19,000 sqm of floorspace at Felixstowe (application no - C05/0034)

### Landscape and Biodiversity

Suffolk Coastal has 32,000ha of Area of Outstanding Nature Beauty (AONB) and 17,656ha of Special Landscape Areas (SLA) as shown in Figure 4.12. It also has significant national and internationally designated areas for birds called Special Protection Areas SPAs/ RAMSAR sites, and Sites of Special Scientific Interest SSSIs) as shown in Figure 4.13.

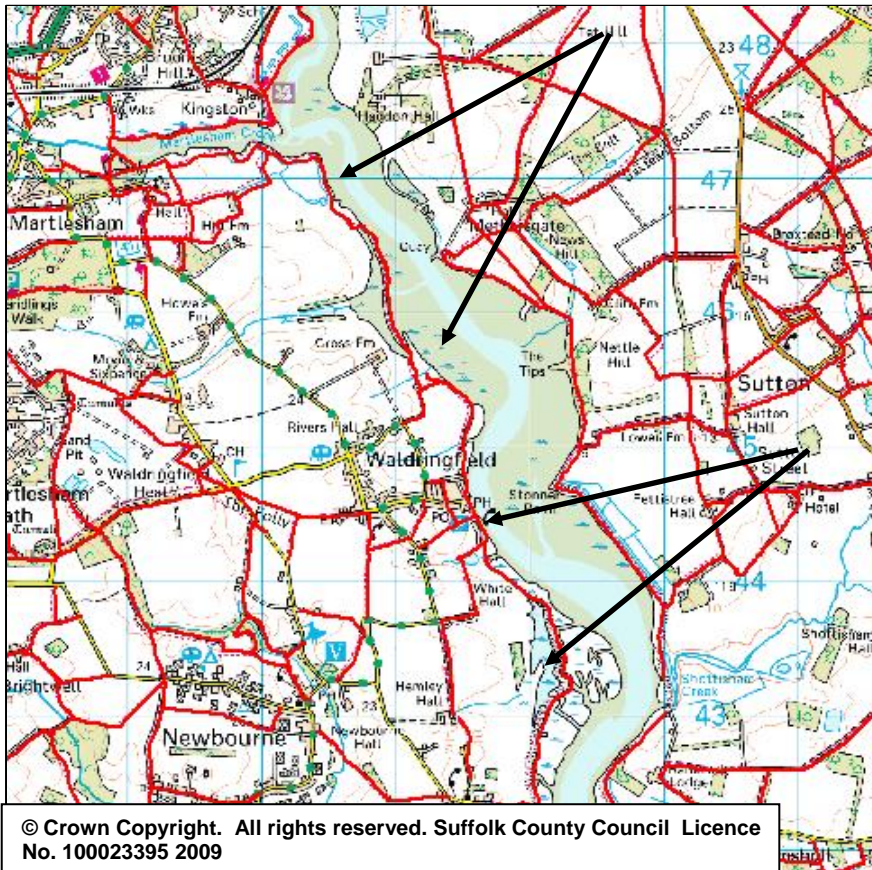
February 2011 Footprint Ecology published the results of its Visitor surveys of recreational use of the South Sandlings. The key findings were:

- Most visitor arrive by car
- Visitor use occurs all year round although more family outings occur in summer
- The main activity is dog walking (67% of visitors brought a dog)
- Visitors were coming from a wide geographical are including Woodbridge, Martlesham, Kesgrave, east Ipswich, Saxmundham, Wickham market, Leiston, Snape and Orford.
- Nightjar and Dartford Warbler distributions are sensitive to the intensity of visitor use, raising concerns for the impact of any potential increase in visitors. The SPA is classified for Nightjars so this is a major concern.

The Deben Estuary Visitor Survey (July 2011) prepared by No Adastral New Town gives details of visitor number to 5 sites on the River Deben in the Waldringfield area in April and May 2011. The proportion of people who travelled by car to Waldringfield was similar to that found in the South Sandlings survey although fewer brought dogs. People tended to stay longer on the Deben estuary although this may be due to the public house. The distances people travelled to reach the 5 survey points on the Deben were much longer than found in the South Sandlings study. The mean average distance by foot was 3.8km compared to a median average of 400m in the South Sandlings survey. The Deben estuary survey did not survey people about where they walked.

In fact people cannot walk **along the estuary** from Martlesham Church all the way to Waldringfield or from Waldringfield to Hemley due to parts of the path (still shown on OS maps) being lost to erosion. Figure 4.11 shows the sections (between the arrows) of the path that are missing. Signs are in place explaining this as the paths have been largely impassable since being breached in the floods of 1953 (Photograph 1).

Figure 4.11: Paths lost to erosion around Waldringfield



As the paths cannot be reinstated along their previous routes and there is no “roll back” policy, should new routes ever be proposed they would need Appropriate Assessment (if part of a developer proposal) or similar Section 32 assessment under the Habitats Regulations should Suffolk County Council as Rights of Way authority seek to replace them.

The Appropriate Assessment for the SCDC Core Strategy and Development Management Policies by the Landscape Partnership (August 2011) based on the existing planning permissions since 2010, final numbers and distribution of new housing including the cumulative effect of new housing in Ipswich Borough, concludes that there will be an increase in visitors to the European designated sites within Suffolk Coast and Heaths AONB of around 2% - 5% and a general increase in visitors to European sites in the South Sandlings area of 6% – 12%. The Appropriate Assessment identifies 4 mitigation actions as being required: 1km separation of strategic allocations from European sites to prevent regular walks from home to the sites; Improvements to local greenspace to reduce demand for visits to European sites; provision of a new Country park or similar high quality provision to provide an alternative for recreation activity; and provision of visitor management in the Deben estuary and Sandlings SPA sites, co-ordinated across the



Coast and heaths Area. Photograph 1: End of footpath north of Waldringfield (Supplied by B Godbold)



Figure 4.12: AONB, Conservation Areas and Special Landscape Areas in Suffolk Coastal  
 Most of the Suffolk Coast and Heaths AONB is in Suffolk Coastal. Extensive areas have also been designated as Special Landscape Areas particularly between Framlingham and Wickham Market. There are 34 Conservation Areas ranging from the centre of older villages and towns to hamlets and include open spaces and the landscape setting of a village.

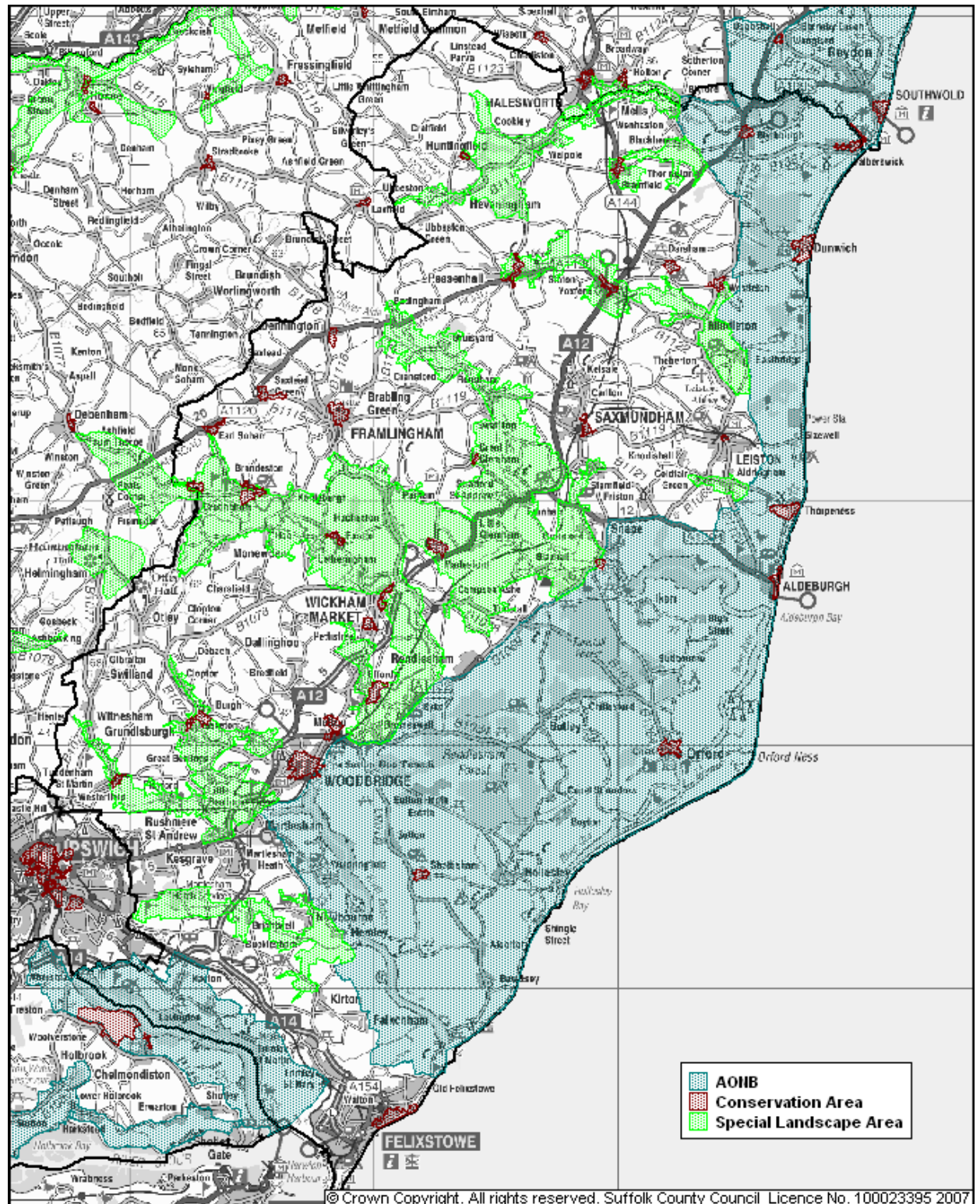
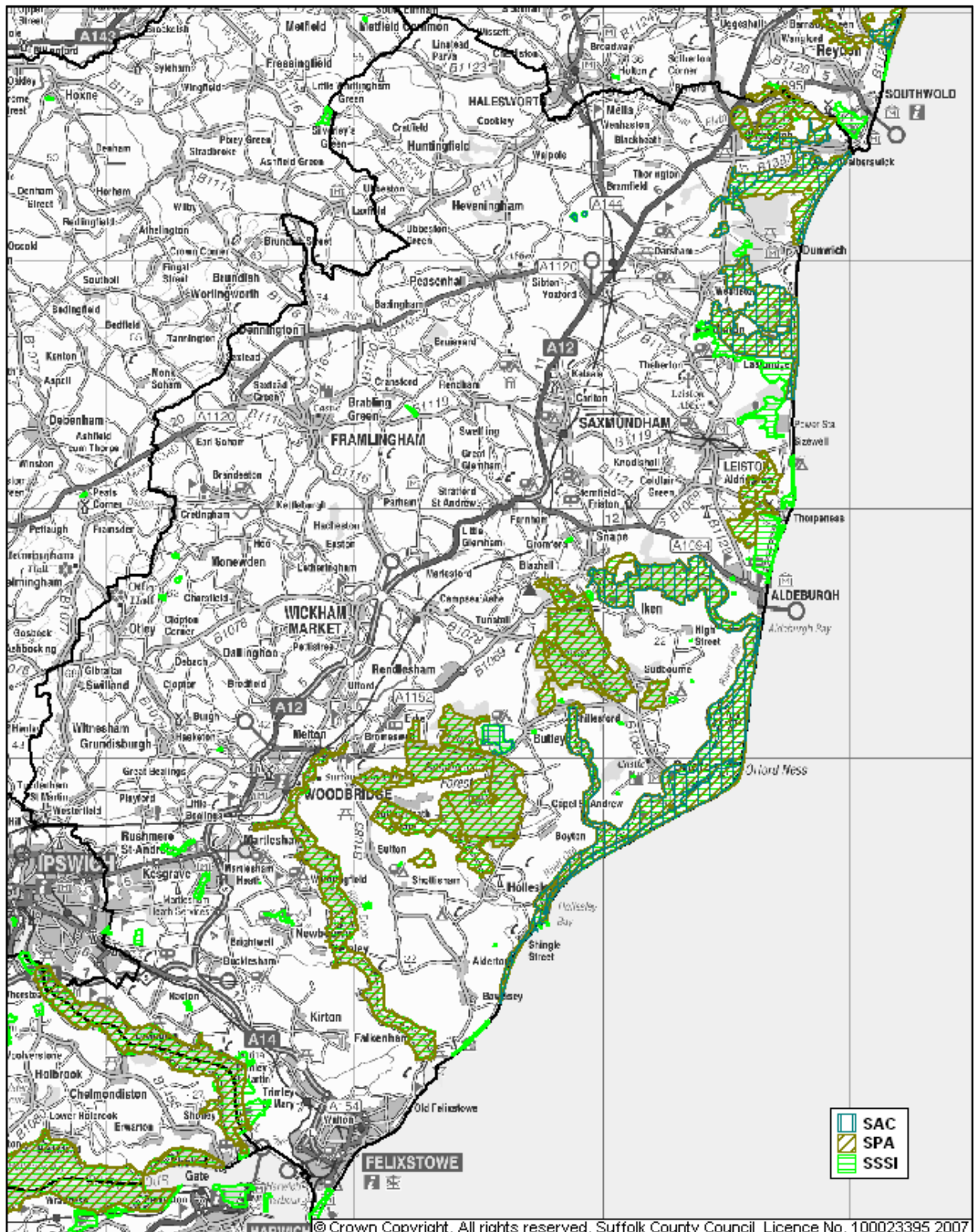




Figure 4.13: Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Sites of Special Scientific Interest (SSSIs)



SACs, SPAs and SSSIs tend to cover similar areas of the coastal fringe. SACs protect wild animals and plant habitats whilst SPAs protect the breeding, feeding, wintering grounds or migration of rare or vulnerable European birds, adding a higher level of protection to SSSIs

### Historic and archaeological heritage

Suffolk Coastal District is characterised by its coastal geography and its alignment to the A12, which approximately follows the historic route of the Ipswich to Yarmouth road, dividing the low-lying Sandlings to the east from the start of the Suffolk high plateau of clay soil and wood-pasture.

The coastal area is characterised by villages and small towns that survived on fishing and imports of continental goods and which now contribute significantly to the tourist sector. None are of any size except Felixstowe which grew as a direct result of the Late Victorian boom in seaside holidays and convalescence. Felixstowe is strongly homogeneous in the architecture of the Edwardian era; other coastal towns have hugely varied buildings types and styles, none especially grand. Another key historic feature of the coastline is its defensive role and evidence survives for this in castles, forts and Martello towers, all of which are significant features of the District.

A key feature of the District's historic geography is the estates that straddled the former route of the Ipswich to Yarmouth road. These were farmed estates, manorial in origin, centred on a great house. Several of these estates with their large houses still survive around Yoxford, for example, but others have shrunk or lost their houses after the Second World War. The value of these estates is recognised by the number registered parks and gardens in the District.

Small market towns evolved in the vicinity of historic routes and nearby river estuaries, such as Woodbridge and Wickham Market; others grew up around defensive structures such as the castle at Framlingham. Defensive architecture is again represented by airfields and associated Cold War structures such as former USAF Bentwaters, again reflecting low-lying and level topography and the significance of the District's military heritage.

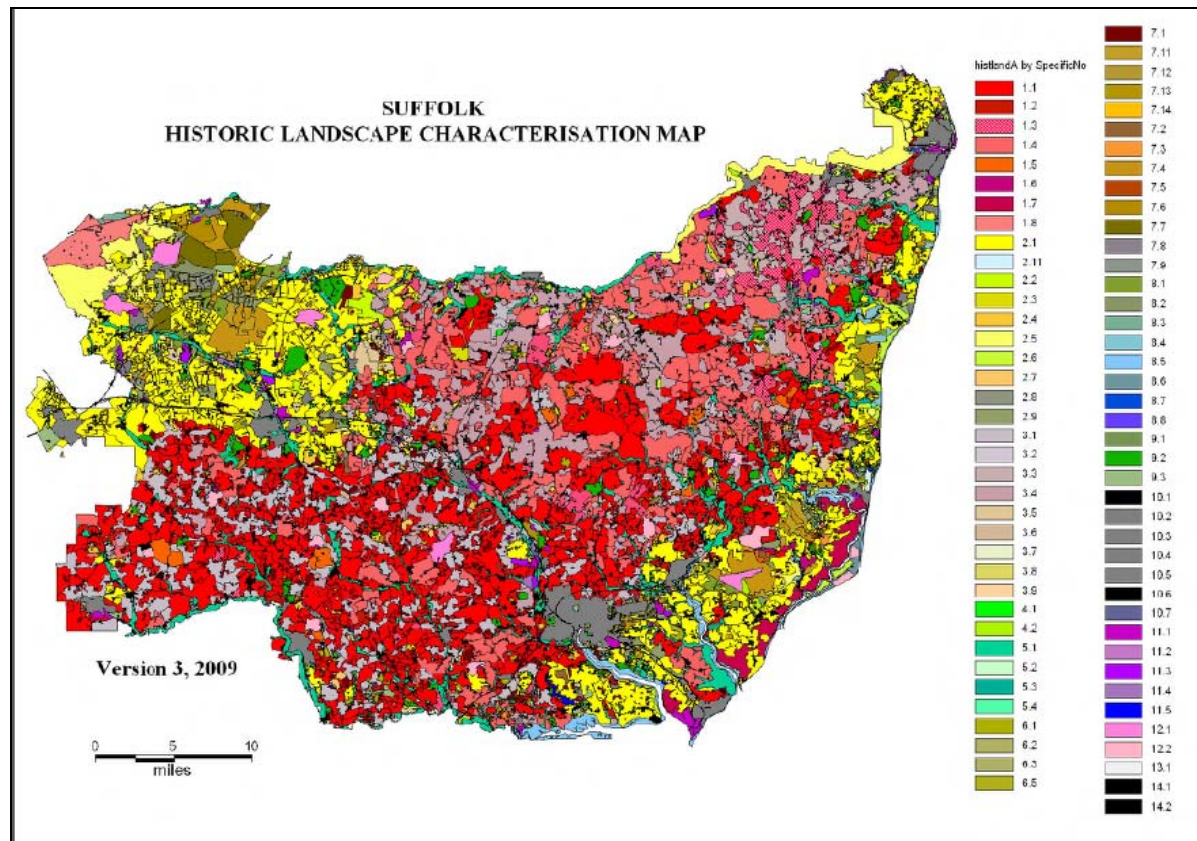
Cultural heritage is a key feature of the District through the internationally-renowned concert venue at Snape Maltings and the annual Aldeburgh Festival; and the association of Aldeburgh and Snape with the artistic lives of Benjamin Britten and Peter Pears. The Maltings are good examples of Victorian agri-industrial buildings, smaller examples of which can also be found in the District.

The great diversity of architecture represented in the District: churches, castles, Martello towers, great houses, seaside buildings and the whole array of characteristic market town architecture from the late-medieval period onwards are outstanding in Suffolk. There is an absence of large settlements, excepting Felixstowe, and limited industrial heritage. This overall heritage is reflected in the high number of listed buildings and conservation areas.

Suffolk Coastal District also has a rich, diverse and densely occupied archaeological landscape with the river valleys, in particular, topographically favourable for early occupation of all periods. The rich and distinctive character of the historic environment in the District includes upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of Roman small towns at Felixstowe and Wenhaston, the internationally important Anglo-Saxon burial ground at Sutton Hoo, numerous medieval historic towns and villages with both above and below ground heritage assets, for example Woodbridge and Aldeburgh, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal. Many others are of regional, as well as of local, importance. Most have been the result of chance findings rather than systematic archaeological investigation and the number of sites continues to rise annually, through investigations relating to new development, research, local interest groups and also as a result of chance finds.

The Historic Landscape of Suffolk Coastal has been recorded in a [Characterisation Map](#) (Figure 4.14 plus copy and key in Appendix 9) for the County created in 1998-1999. This identifies 14 broad character types ranging from Pre-18<sup>th</sup> century enclosure to Industrial or built up area and a further 77 subtypes. This provides a means to enhance understanding and managing of historic landscapes, particularly in relation to other environmental issues. Suffolk Coastal has the most diverse mix of historic landscapes of all the Suffolk Districts with a mix of healthland, intertidal land, former coastal marsh to industrial landscape at Felixstowe docks to current and former military use.

Figure 4.14: Suffolk Historic Landscape Characterisation



### Conservation Areas and Listed Buildings

In 2009/10 there were 34 Conservation Areas (CA) in Suffolk Coastal, covering 949 hectares (Figure 4.12). There are approximately 2700 listed buildings in the Suffolk Coastal district, 59 of which are Grade I quality. The 2011 Heritage at Risk register shows 6 of the 23 Grade 1 and II\* listed buildings and structural Scheduled Ancient monuments (SAMS) at risk in Suffolk to be in Suffolk Coastal: Martello Tower Z Alderton; Transmitter Block Bawdsey manor; Grey Friars, Dunwich; Friston Post Mill; Glevering Hall Orangerie, Hatcheston; and the remains of Sibton Abbey. Suffolk Coastal also accounts for 37% (10) of the County's SAMS at risk, one registered Park and Garden at Bawdsey Manor (of 3 at risk in Suffolk) and 1 Conservation Area, Felixstowe South (of 6 at risk in Suffolk). There are a further 8 Grade II buildings identified to be at risk (2009). The East of England Environmental Capacity Report Stage 1 2007 identified an area on the outskirts of Ipswich around Witnesham, Playford and Otley which was considered (from local knowledge) to be approaching critical thresholds but where some consideration is being given to the historic environment, plus an area around Felixstowe where critical thresholds had already been breached.



The District's listed buildings at risk reflects, to some degree, a cross-section of its local heritage: redundant military structures (including a Martello Tower), disused farmhouses and mills; and former transport and industrial buildings. The total number is around 1% of the number of listed buildings in the District. Figure 4.15 shows the distribution of Listed Buildings, Scheduled Ancient Monuments and buildings on the Sites and Monuments record, highlighting the importance of the coast.

Figure 4.15: Distribution of Listed Buildings, Scheduled Ancient Monuments (SAMs) and buildings on the Sites and Monuments Record (SMR)

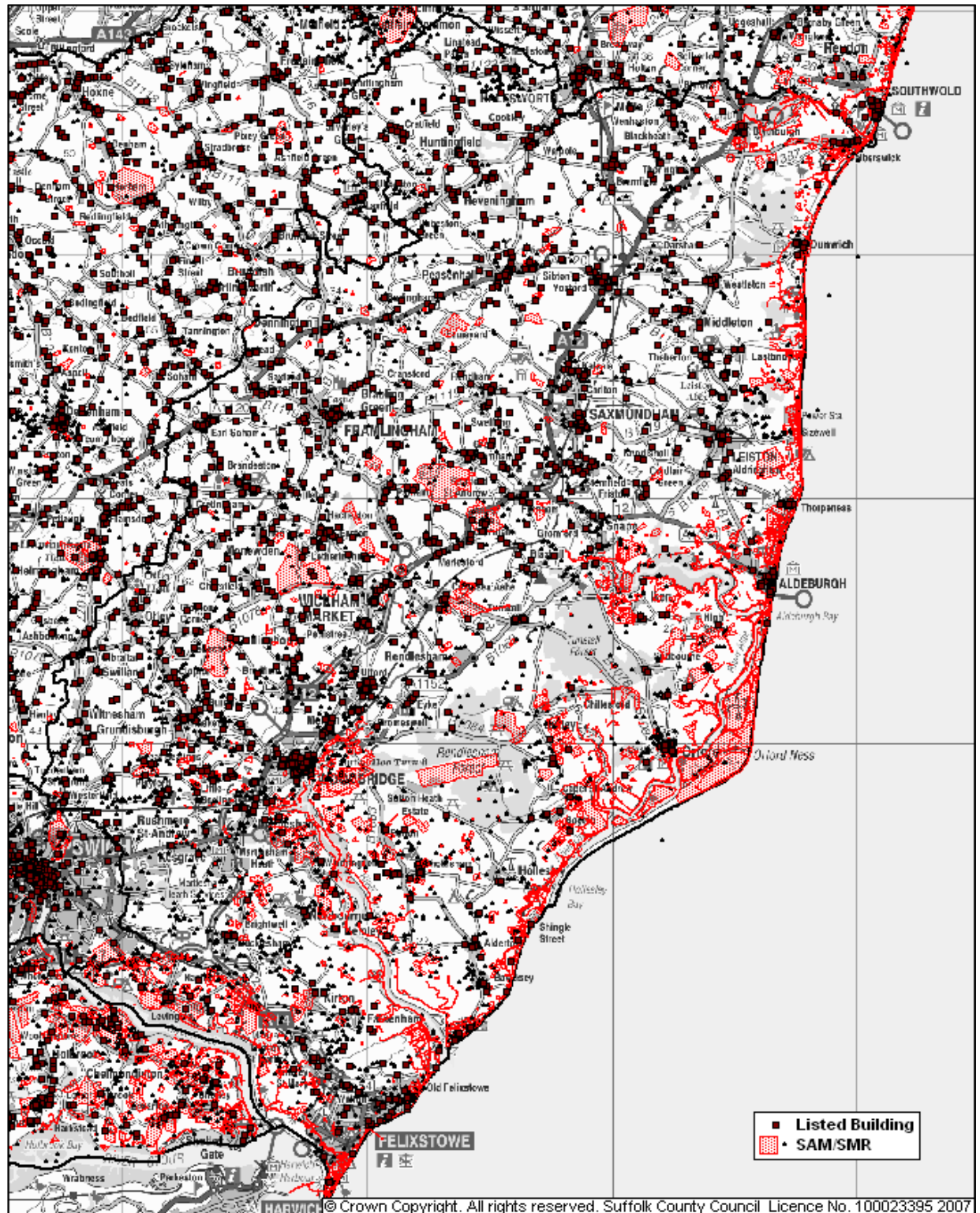
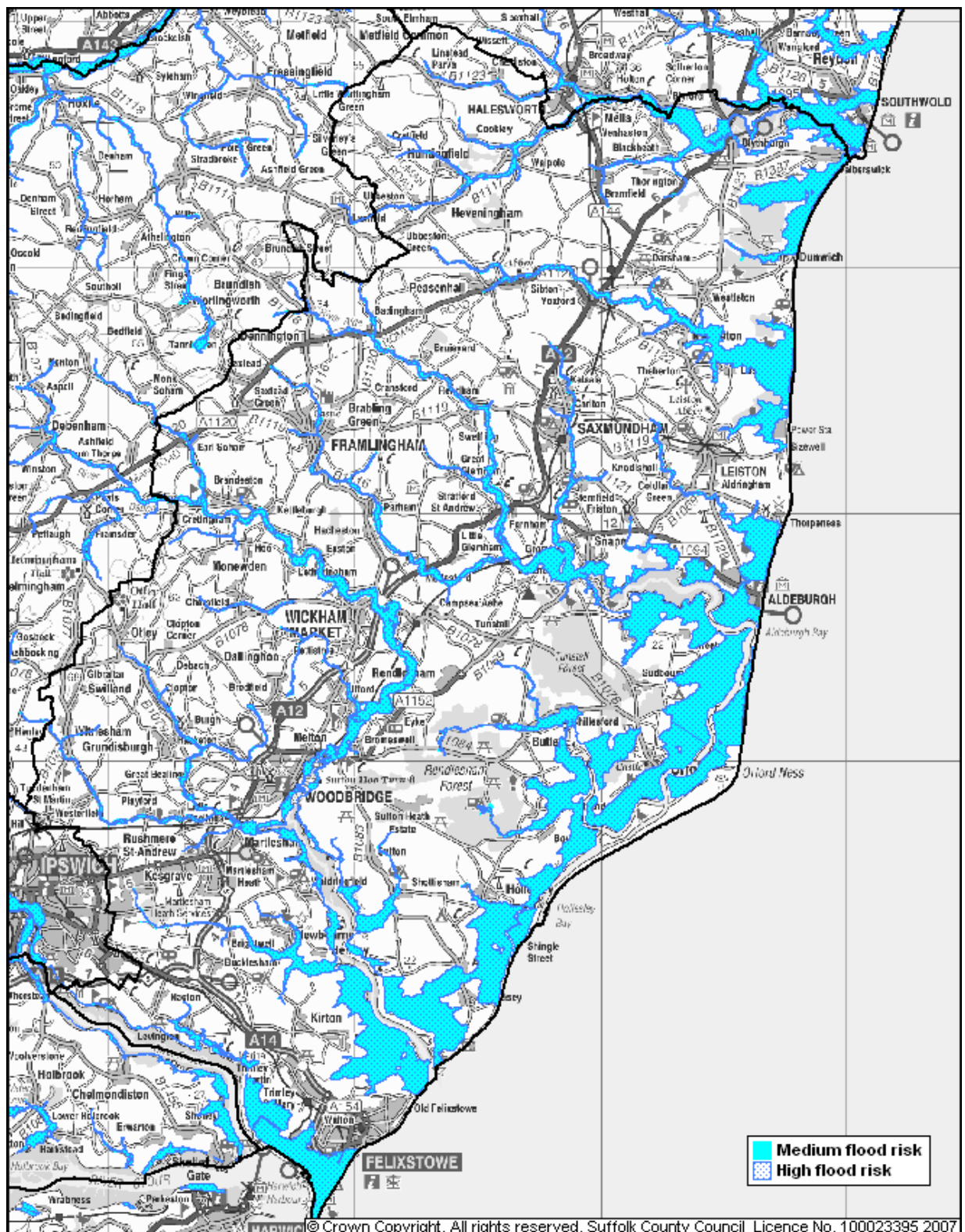




Figure 4.16: High and medium flood risk areas in Suffolk Coastal



The [Strategic Flood Risk Assessment for Suffolk Coastal](#) was completed in 2009. Figure 4.16 shows the extent of coastal, estuarine and fluvial high and medium risk flood areas in Suffolk Coastal, important in terms of influencing habitats and location of new development as development needs to be steered away from high risk areas. Notably a lot of the coastal zone is at high risk of coastal flooding.

### **Pollution and Air Quality**

There are 8 Air Quality Management areas declared in Suffolk: 3 in Ipswich, 2 in Suffolk Coastal - Melton Hill, Woodbridge, Ferry lane, Felixstowe close to the main entrance to the Port of Felixstowe: one in Babergh, Cross Street, Sudbury, one in Forest Heath the northern end of Newmarket High Street/western end of Station Road including the Clock Tower Junction, and in St Edmundsbury A143 at Great Barton Post Office. All are due to high Nitrogen Dioxide levels. The Action Plan for the Woodbridge AQMA is complete and a staged approach to implementation of measures to improve air quality has started.

In terms of recycling and composted household waste, Suffolk Coastal equalled the Suffolk average of 48% in 2008/9 (which is one of the highest proportions in England).

ONS 2009 Co2 emissions data for Suffolk Coastal from 2005 to 2007 shows reducing emissions by industry and commerce, domestic and road transport.

### **Water**

The Haven Gateway Water Cycle Study was commissioned as a result of the Regional Spatial Strategy (East of England Plan) acknowledging that water resources in the east of England are limited. The study looks at issues of water supply, quality, wastewater treatment and food risk. It should be noted that the Haven Gateway Water Cycle Study does not cover all parts of Suffolk Coastal and therefore does not provide a comprehensive evidence base for the whole District. However this is not considered to be an issue as the areas making up the focus for growth across Suffolk Coastal are predominately in the Haven Gateway area. The Water Study only considered 1000 houses in the East Ipswich area and the plan proposal is now for 2,100, so the relevant thresholds already met with proposals for 1,000 houses still apply.

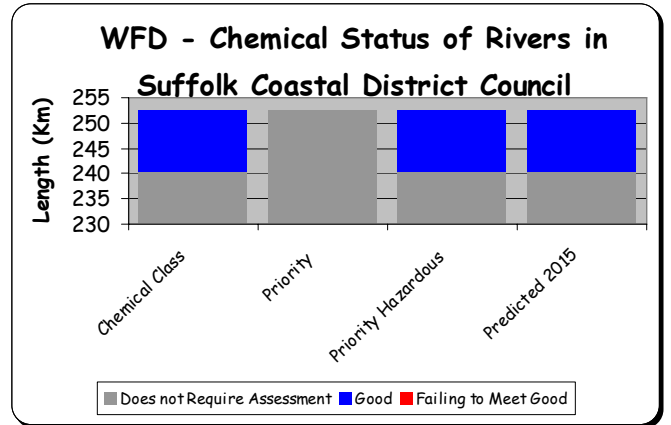
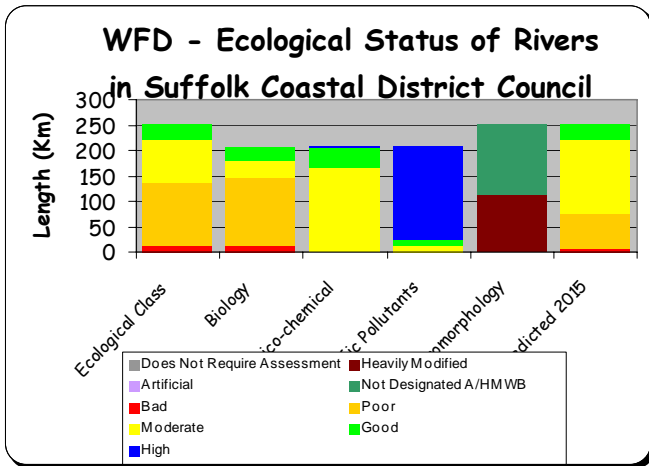
In terms of supply due to limitations of existing infrastructure in the Felixstowe area, the Haven Gateway Water Cycle Study (2009) states that any scale of significant housing growth in this area will require off-site reinforcement works to water supply infrastructure and a new main is likely to be required for development in the East Ipswich.

In terms of water quality the charts below show the ecological and chemical classification status for water bodies in Suffolk Coastal under the Water Framework Directive (WFD). The two primary aims of the WFD are for there to be no deterioration in the status of the water environment in terms of water quality, water quantity, biology (fish and plants) and morphology (the physical form of the water environment). The current baseline status is summarised in the Anglian River Basin Plan (December 2009).

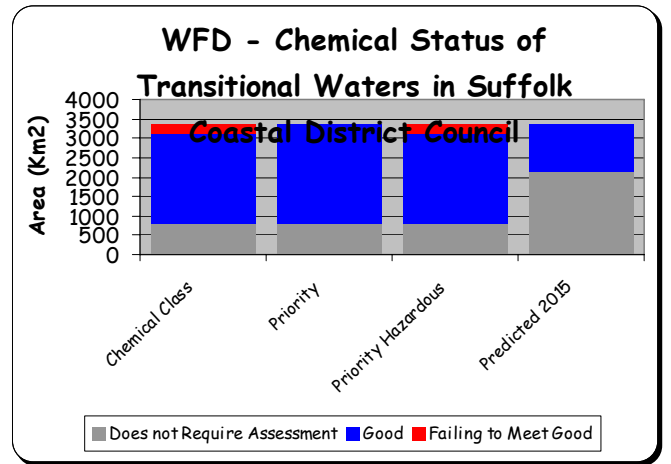
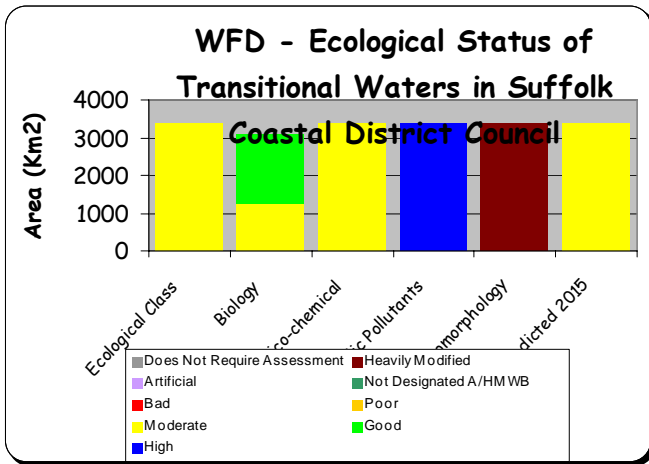
Many of the East Suffolk rivers are impacted by drought and periods of low flows, which is reflected in the dissolved oxygen levels measured in some of these rivers dropping to low levels. Despite this, some are still able to support a reasonable fish population dominated by roach, bream, dace and chub.

### **River Status**

As shown in the diagrams below, overall, 11.8% of Rivers are Good or High Ecological Status and 100% of the rivers that require assessment are Good Chemical Status. 54% of Rivers are Poor or Bad Ecological Status and none of the rivers that require assessment fail to meet Good Chemical Status.

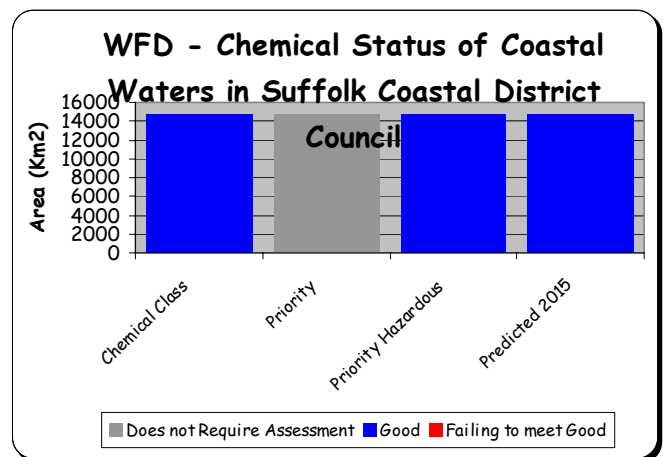
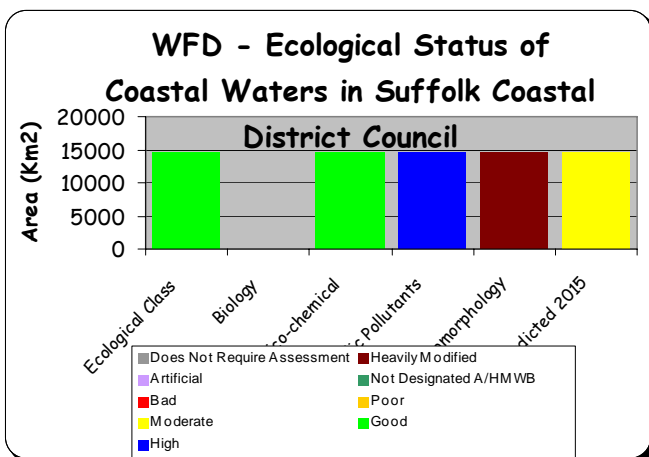


### Transitional Waters (Estuaries)



Overall, no Transitional Waters are Good or High Ecological Status and 90% of the Transitional Waters that require assessment are Good Chemical Status.

### Coastal Water



Overall, 100% of Coastal Waters are Good or High Ecological Status and 100% of the Coastal Waters that require assessment are Good Chemical Status.

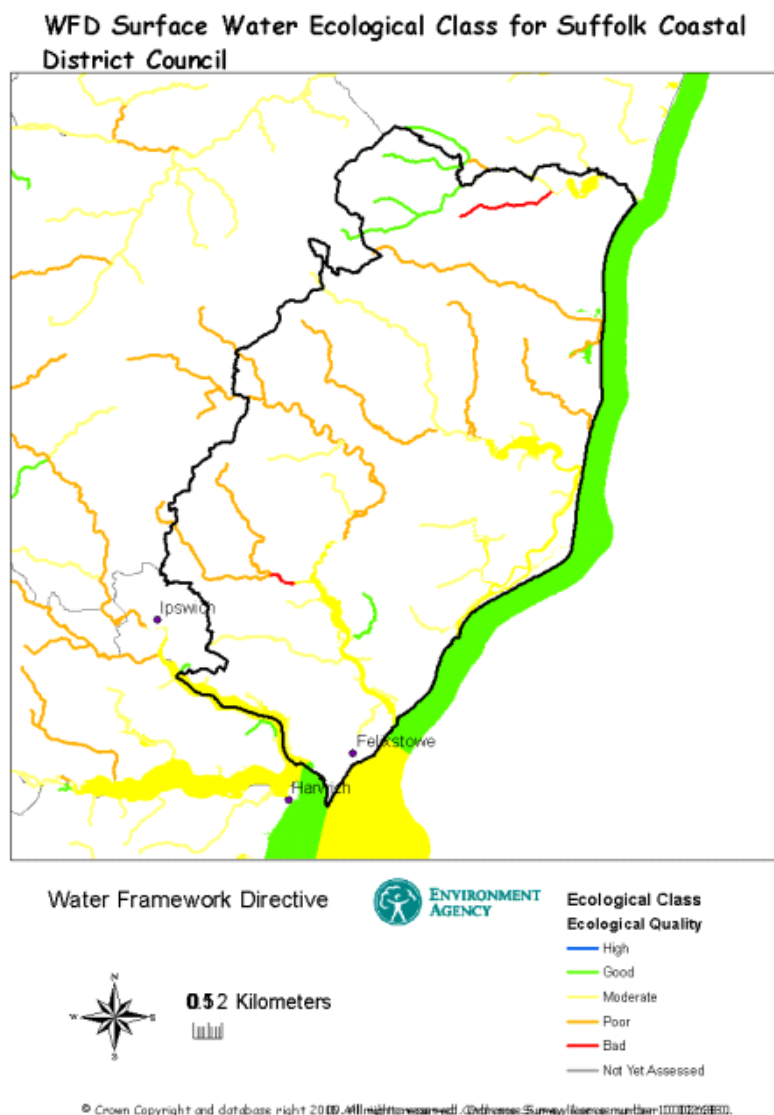
The groundwater chemical class for Suffolk Coastal is poor throughout although the groundwater quantity class was assessed as good in 2009.

According to the Haven Gateway Water Cycle Study (2009) in the Felixstowe area, there is an estimated immediate foul-drainage capacity available to deal with a modest growth of housing up to around 100 homes. However, beyond these figures, substantial growth numbers will require off-site reinforcement work for wastewater infrastructure. For the Eastern Ipswich Plan Area funding will be required to secure a new independent drainage system and off-site drainage discharging via new pump station to the Cliff Quay Catchment. There are concerns that there is limited capacity at Leiston sewage works beyond the current volumetric limit.

The [Anglian Water Asset Management Plan \(AMP\) 2010](#) sets out the priorities for water supply infrastructure. The draft final [Suffolk Shoreline Management Plan](#) was provisionally approved by Suffolk Coastal's Cabinet in February 2010. It has now been approved by Defra, signed off by the Environment Agency and approved by SCDC Cabinet on 1 November 2011. The document assesses the large scale risk to the coast from erosion and identifies areas for no active intervention and managed retreat.

Figure 4.17 shows the surface water ecological class for Suffolk Coastal District as presented in the Anglian River Basin Management Plan 2009, where the main concerns are on the River Blyth and River Deben.

Figure 4.17: Surface Water Ecological Class for Suffolk Coastal



**Energy /  
Renewable**

## Energy

Suffolk's renewable energy generation capacity was at least 35.5MW in 2008. The Greater Gabbard offshore wind farm will produce enough electricity to power all of Suffolk's households when completed plus there is an outstanding planning permission for wind turbines at Parham. Suffolk Coastal is home to a large nuclear power station at Sizewell, near Leiston. Sizewell A is currently being decommissioned and Sizewell B is likely to be replaced by Sizewell C, a new nuclear power plant on the existing site.

The Department for Energy and Climate Change publishes LA figures showing energy sales by type of use. The figures for Suffolk Coastal show reducing domestic sales between 2005 and 2008 (from 306 to 285 GWh) but rising commercial and industrial sales (320 to 322GWh).

## 4.2 Key issues in Suffolk Coastal

Table 4.3 includes a summary of key issues for Suffolk Coastal, as identified in the review above and relevant to the indicators used in the SA framework.

*Table 4.3: Key social, environmental and economic issues in Suffolk Coastal*

<b>Social issues</b>	
Health	<ul style="list-style-type: none"> <li>• Compared to England, Suffolk Coastal has low levels of deprivation with about 1 in 14 local people being dependent on means-tested benefits. Levels of reported violent crime are also lower than the England average.</li> <li>• Teenage pregnancy rates in Suffolk Coastal are lower than the England average.</li> <li>• Estimates suggest that adults living in Suffolk Coastal are less likely to smoke and binge drink than the England average and more likely to eat healthily.</li> <li>• Life expectancy for both men and women in Suffolk Coastal is higher than the England average. However, men living in the most deprived fifth of areas of Suffolk Coastal can expect to live 3.9 years less than those in the least deprived fifth. The gap for women is 3.3 years.</li> <li>• Deaths due to smoking are lower than the England average but smoking still kills some 180 local people every year.</li> <li>• A lower proportion of people in Suffolk Coastal rated their health as 'not good' compared to the England average.</li> <li>• The rate of hip fracture in people aged over 65 is lower than England average.</li> <li>• The percentage of people with recorded diabetes is relatively low: however, about 4782 people are still recorded with this condition.</li> <li>• The Felixstowe Infrastructure Study 2009 suggests it has a deficiency of children's playspace.</li> </ul>
Education and skills	<ul style="list-style-type: none"> <li>• Although the proportion of children gaining level 4 in Key Stage 2 is increasing, it is still lower than regional and national averages.</li> <li>• The proportion of people in Suffolk Coastal with no qualifications was 10.4% in December 2008, lower than regional and national averages, whilst 25.8% of people are qualified to NVQ level 4 or above (equivalent to degree level); lower than the regional average of 26.1%.</li> <li>• The proportion with NVQ1 and above is higher than the Suffolk average (76.8%) at 85%</li> <li>• GCSE attainment in Suffolk Coastal is higher than the Suffolk average, however a level attainment is below the Suffolk average.</li> </ul>
Crime and anti-social	<ul style="list-style-type: none"> <li>• The overall crime rate in Suffolk is 66 crimes per 1000 population. In Suffolk Coastal the rate is below the Suffolk average and decreasing at</li> </ul>

behaviour	both county and district level.
Poverty and social exclusion	<ul style="list-style-type: none"> <li>• There will be a 50% increase in the number of people over 65 between 2001 and 2021.</li> <li>• Levels of deprivation are low for Suffolk Coastal, but pockets of deprivation exist in Felixstowe, Saxmundham and Leiston.</li> </ul>
Access to services	<ul style="list-style-type: none"> <li>• Only 33% of the rural population live in settlements with a food shop/general store, post office, pub, primary school and a meeting place.</li> <li>• Only 42% of the rural population live within 13 minutes walk of an hourly bus service.</li> </ul>
Employment	<ul style="list-style-type: none"> <li>• In Sept 2010 unemployment in Suffolk Coastal was 7.1% compared to 6.6% in Suffolk, the third highest District rate in Suffolk.</li> <li>• Suffolk Coastal consistently has the highest median weekly earnings in Suffolk at £515 compared to £478.</li> <li>• Numbers of jobs available in the District and employed residents have fallen in the last 2 years.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>• Housing completions have fallen sharply with the recession but on average remain above the level suggested by the RSS.</li> <li>• In 2009/10 42% of completions were affordable compared to only 7% in 2007-8.</li> </ul>
Quality of living environment and community participation	<ul style="list-style-type: none"> <li>• Data is limited for indicators in this area. According to the 2006/7 BVPI Satisfaction survey, 81% of Suffolk residents are happy with the area they live in.</li> <li>• Although the number of pupils visiting museums and galleries in organised school trips has been rising steadily over the past three years, the figure is still well below the regional average.</li> </ul>
<b>Environmental issues</b>	
Water and air quality	<ul style="list-style-type: none"> <li>• 2 air quality management areas at Melton Hill, Woodbridge, and Ferry lane, Felixstowe close to the main entrance to the Port of Felixstowe:</li> <li>•</li> <li>• 11.8% of Rivers are Good or High Ecological Status and 100% of rivers requiring assessment are Good Chemical Status. 54% of Rivers are Poor or Bad Ecological Status and none of the rivers that require assessment fail to meet Good Chemical Status.</li> <li>• No Transitional Waters are Good or High Ecological Status and 90% of the Transitional Waters that require assessment are Good Chemical Status.</li> <li>• 100% of Coastal Waters are Good or High Ecological Status and 100% of the Coastal Waters that require assessment are Good Chemical Status.</li> <li>• There are water supply infrastructure issues in Felixstowe and East Ipswich.</li> <li>• There are foul drainage constraints in Felixstowe, East Ipswich and Leiston.</li> <li>• No planning permissions were granted in 2010/11 contrary to an outstanding Environmental Agency objection on flood risk, as far as the Agency are aware but they only see a small proportion of all decision notices.</li> </ul>
Soil	<ul style="list-style-type: none"> <li>• 66% of completions for the 2009/10 monitoring year were build on Previously Developed Land. .</li> </ul>
Water and mineral resources	<ul style="list-style-type: none"> <li>• Mineral extraction in Suffolk primarily involves sand and gravel, of which there are adequate supplies. Trend data shows that production of recycled aggregates has increased significantly in the last few years compared to pre-1998 levels, and proportion of total mineral sales that they represent continues to rise.</li> <li>• Daily domestic water consumption averaged 153 litres per person in East</li> </ul>



	of England in 2008/9., above the national average No local figures are available.
Waste	<ul style="list-style-type: none"> <li>• Although waste levels are decreasing and recycling and composting is increasing, Suffolk has relatively high levels of household waste per person. Suffolk Coastal matches the Suffolk average recycling rate.</li> <li>• The sewage network in Felixstowe, East Ipswich and Leiston are close to capacity and an Infrastructure Study (2009) suggests it would need significant expansion to cope with new development.</li> </ul>
Traffic	<ul style="list-style-type: none"> <li>• The Port of Felixstowe, the largest container port in the country, has a large impact on HGV traffic in Suffolk, particularly on the A14. Proposed port expansion would lead to an increase in HGV traffic in the future.</li> <li>• Woodbridge, Felixstowe and several settlements along the coast currently experience congestion especially during the summer.</li> <li>• Capacity issues of the Orwell Bridge have been predicted and this could impact the rate of development in Suffolk Coastal.</li> <li>• Traffic levels at monitored locations in Suffolk have increased steadily since 1999 although there has been a slight drop in 2008 linked to the high cost of fuel. Traffic growth has implications for many environmental aspects, including air quality and pollution, congestion, road safety, tranquillity and climate change.</li> <li>• The dispersed nature of Suffolk's rural population, combined with a lack of services, regular scheduled public transport and a growing population, could lead to increased demand for private travel.</li> <li>• According to the 2001 census, 21% of Suffolk residents travelled to work by sustainable modes, below the regional and national averages. Travel to work surveys carried out on public sector employees in Suffolk show that fewer people are travelling to work sustainably in more than half of the local authorities.</li> <li>• One third of children are taken to school by car and 17% travel by bus.</li> </ul>
Reduction in green house gas emissions	<ul style="list-style-type: none"> <li>• Co2 emissions data for Suffolk Coastal from 2005 to 2007 shows reducing emissions by industry and commerce, domestic and road transport.</li> <li>• Suffolk Coastal show reducing domestic electricity sales between 2005 and 2008 (from 306 to 285 GWh) but rising commercial and industrial sales (320 to 322GWh).</li> </ul>
Vulnerability to flooding	<ul style="list-style-type: none"> <li>• Environment Agency information suggests that around 12,000 properties in Suffolk are at risk of flooding from rivers or the sea (in the event of a 1 in 100-year fluvial or 1 in 200-year tidal flood).</li> <li>• There were only two flood warnings in 2004.</li> <li>• The number of planning applications approved against Environment Agency flood risk advice rose in 2004/5, though the number is still low (9).</li> </ul>
Biodiversity	<ul style="list-style-type: none"> <li>• Suffolk Coastal has 32,000ha of AONB and 17,656ha of SLA, as well as significant 8,120 ha RAMSAR sites and 5,684 ha in county wildlife sites.</li> <li>• There are 45 SSSIs in Suffolk Coastal, mainly concentrated towards the east of the district.</li> <li>• A number of Biodiversity Action Plans and Habitat Action Plans are in place to conserve nationally and locally important habitats and species.</li> <li>• A recent study suggests current levels of visitor use are disturbing Nightjars in the Sandlings SPA.</li> </ul>
Historical and archaeological importance	<ul style="list-style-type: none"> <li>• There are 2,761 listed buildings in Suffolk Coastal, of which 59 are grade 1.</li> <li>• 6 Grade 1 &amp; II* Listed Buildings, 10 Scheduled Ancient Monuments, 1 Registered Park and garden and 1 Conservation Area are at risk in Suffolk Coastal.</li> <li>• Sutton Hoo is an internationally important Anglo Saxon site plus there are significant numbers of Bronze Age tumuli and potential for finds. There are</li> </ul>

	<p>remains of small Roman towns at Wenhaston and Felixstowe.</p> <ul style="list-style-type: none"> <li>• There is a very wide range of historic landscape characterisation types in Suffolk Coastal.</li> </ul>
Landscapes and townscapes	<ul style="list-style-type: none"> <li>• Large parts of Suffolk Coastal DC are designated as AONB.</li> <li>• Light pollution increased in the county between 1993 and 2000. Levels of pollution are lower than the average for England, but Suffolk does contain proportionally less area in the darkest category than the national average.</li> <li>• There are 33 conservation areas in Suffolk Coastal.</li> <li>• There is a deficiency of 20ha of green infrastructure identified in the Felixstowe Infrastructure Study 2009.</li> </ul>
<b>Economic issues</b>	
Prosperity and economic growth	<ul style="list-style-type: none"> <li>• Although the number of businesses in Suffolk is increasing, the business formation rate is lower than regional and national averages. Suffolk Coastal currently has a business formation of 7.7, which is 0.3 lower than the county average (2007).</li> <li>• 17% of Suffolk coastal employees are employed in distribution or transport, and a further 25% in public services.</li> </ul>
Town centres	<ul style="list-style-type: none"> <li>• In 2005/6, around 5.6% of town centre units were vacant in Suffolk, a level higher than in previous years. In Suffolk Coastal, 5.4% of town centre units were vacant, lower than the county figure.</li> </ul>
Patterns of movement	<ul style="list-style-type: none"> <li>• According to the 2001 Census, the average resident of Suffolk Coastal travels 15.02km to work. This is further than the national average of 13.4km, but around average for the Eastern region and Suffolk.</li> <li>• The percentage of the workforce who work mainly from home was slightly higher than average at around 10%.</li> <li>• Overall use of sustainable modes for journeys to work by Suffolk residents was below both national and regional averages in the 2001 Census, at 21% (although figures for cycling and walking were above average).</li> <li>• The proportion of containers travelling from the Port of Felixstowe by rail has not grown since 2003/4 and remains at the same levels seen in 1999 but the number of units has increased by 87% since 2001/2</li> </ul>
Investment	<ul style="list-style-type: none"> <li>• Baseline data on investment is currently very limited, making it difficult to identify issues.</li> </ul>

### 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 Table 4.3 above could be expected to some extent but these policies do not operate in isolation. Plans of other statutory agencies, for example investment in water supply and disposal infrastructure, 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 Table 4.3 highlight the issues over and above the implementation of existing policy that the new plan should address, as these trends would be likely to continue in a predicted future baseline. A future baseline without the plan is likely to see continuing pressure on the coastal environment including the landscape and historic heritage of the Suffolk Coasts and Heath, from natural influences (flooding, erosion) plus the expansion of the port of Felixstowe, Sizewell C and from tourism and recreation. Given the current economic climate the level of house building seen in the last 10 years up to 2010 is not predicted to continue however greenfield sites are likely to be needed to fulfil housing needs and this will put further pressure on historic built environment and archaeological heritage. There would likely be increasing congestion on



the A12 around Woodbridge and in the Kesgrave/Martlesham area and on the A14 around Ipswich.

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.

#### 4.4 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. The date of data used above varies as the most up to date available is used, but this does not enable a clear view at any one point in time. There is a lack of data on outdoor and children's play space, important to promoting healthy lifestyles.

It is not possible to include data about very recent events that might be linked to climate change. Between December 2010 and June 2011 extremes of weather have been experienced in the Suffolk Coastal area that may have implications for future infrastructure needs (e.g. response to prolonged spells of snow, the impact on remote communities, need for village shops/distribution) or implications for water resources, agricultural productivity etc stemming from prolonged rainless periods.

## 5. Sustainability objectives

### 5.1 Links to other policies, plans and programmes

Stage A of the SA process demands that the context in which the LDF is being prepared is considered and referred to within this document. The context refers to other relevant policies, plans, programmes, strategies and initiatives. The reason for the inclusion of other relevant documents and programmes is because they may act as an influence on the LDF. Environmental protection objectives are set out in many policies and legislation. These may influence the SA process and preparation of new LDF documents. Any relationship between plans and programmes must be identified so that advantage can be taken of overlapping sections and any inconsistencies and constraints dealt with. This review will help to identify issues and objectives that must be covered by SA.

The context review considers guidance that has been issued at the international, European, national, regional and local level with regard to the SA process. Targets and specific requirements of the plans, programmes and objectives have been identified and included where possible in the SA process. Environmental assessments conducted for any of the relevant plans, programmes and objectives may be useful sources of information that can act as baseline data. Environmental protection objectives that have been established so that the SEA Directive can be complied with must be carefully noted.

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 the October 2008 SA report. SCDC updated the local scoped documents in April 2011 and a list has been included at Appendix 7 and the matters arising included in the foregoing baseline and issues identification.

### 5.2 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 5.1. 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 is included in Appendix 1.

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 new ones were added, such as % of households with broadband internet connection for objective 22.

*Table 5.1: 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 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

### 5.3 Compatibility of SA and Plan objectives

As part of the SA, it is necessary to assess the compatibility of the fifteen core strategy objectives against the 23 SA objectives listed in table 5.1. Table 5.2 sets out the core strategy objectives.

*Table 5.2 Core strategy objectives*

<b>Title</b>	<b>Description</b>
1. Sustainability	To deliver sustainable communities through better integrated and sustainable patterns of land use, movement, activity and development.
2. Housing Growth	To meet the minimum locally identified housing requirements of the district for the period 1/4/2010 to 31/3/2027
3. Local Housing	To provide for the full range of types and locations of new homes to meet the needs of existing and future residents of the district
4. Economic Development	To support the growth and regeneration of the local economy and to build on those elements of its unique economic profile which are identified as being of sub-regional, regional and national significance.
5. The Rural Economy	To sustain, strengthen and diversify the rural economy
6. Tourism	To promote all year round tourism based on the environmental, cultural and social attributes of the area
7. Felixstowe and the Market Towns	To sustain and enhance the vitality and viability of Felixstowe and the market towns (Aldeburgh, Framlingham, Leiston, Saxmundham and Woodbridge) as retail, service, and employment centres serving their local populations and that of their neighbouring rural communities.
8. Transport	To enhance the transport network across the district
9. Climate Change	To adapt to and mitigate against the potential effects of climate change, and minimise the factors which contribute towards the problem.
10. The Coast	To secure the continuing prosperity and qualities of coastal areas and communities, whilst responding to climate change and the natural processes that occur along the coast
11. Protecting and Enhancing the Physical Environment	To maintain and enhance the quality of the distinctive natural, historic and built environments including ensuring that new development does not give rise to issues of coalescence.
12. Design	To deliver high quality developments based on the principles of good, sustainable and inclusive design
13. Accessibility	To promote better access to housing, employment, services and facilities for every member of the community.

14. Green Infrastructure	To encourage and enable the community to live and enjoy a healthy lifestyle; to promote urban cooling (e.g. shading from trees, canopies on buildings to cool down areas and buildings in urban settings) in major settlements as well as support biodiversity and geodiversity.
15. Physical and Community Infrastructure	To ensure that, as a priority, appropriate infrastructure such as transport, utilities or community facilities are provided at an appropriate time, in order to address current deficiencies and meet the needs of new development.

The result of this assessment can be seen in Table 5.4. Compatibility is represented by a ✓, meaning that both objectives can operate simultaneously and advantage each other; negative compatibility with an X and cases with no apparent effect on each other by a 0. Brief reasons for the scores are given in Table 5.4.

For the 23 SA objectives, only one (To reduce waste) had more negative compatibilities than positive. This highlights the challenge of trying to reduce waste whilst promoting development. No plan objectives appear to have more negative compatibilities with SA objectives than positive, signifying that the wording of the objectives has a high level of sustainability ingrained in them.

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 5.3) 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.

For 7 out of 15 objectives there were more neutral compatibilities (i.e. no significant interaction) whilst in 8 cases there were no negative compatibilities.

The negative compatibilities were restricted to eight of the 23 SA objectives. The plan objectives concerned were all linked to controlling new housing and business development and the negative compatibilities with SA objectives were largely concerned with possible increases in traffic and the resulting effect on air and water 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.

*Table 5.3: Overall compatibility of the plan objectives with the SA objectives*

<b>Core Strategy Objectives</b>	<b>✓</b>	<b>0</b>	<b>X</b>
1. Sustainability	18	5	0
2. Housing Growth	9	11	4
3. Local Housing	10	10	3
4. Economic Development	9	8	6
5. Rural Economy	6	11	6
6. Tourism	8	12	2
7. Felixstowe and the Market Towns	8	13	2
8. Transport	6	17	0
9. Climate Change	8	15	0
10. Coast	8	15	0
11. Physical Environment	5	18	0
12. Design	12	11	0
13. Accessibility	10	11	2
14. Green infrastructure	3	20	0
15. Physical and Community Infrastructure	5	18	0

Note to Table 5.4: The Environment Agency in October 2011 made the observation that there would be more ability to reduce vulnerability to flooding through the housing growth policies (because new sites will be selected) than with employment policies that focused on a few new large sites.

#### 5.4 Mitigation

For several of the negative compatibilities discussed above, mitigation is quite straightforward. Development in areas of biodiversity or landscape/townscape-related importance can be avoided through careful planning. Use of greenfield sites are difficult to avoid given the housing and employment land targets, but their use can be minimised through maximizing use 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.

Increased energy usage as a result of development can be mitigated by requiring energy efficiency standards be met or renewable energy sources used as a development condition.

An increase in traffic is the most difficult issue to address, as it is unrealistic to expect every new resident of the district to use public or sustainable transport all the time. However, some mitigation can be done through the use of travel plans and improving public transport and information. The following appraisal will show that all of these 'mitigation' actions are captured in specific policy statements.

Objective 14 Green Infrastructure introduced the concept of urban cooling and in the most recent draft includes examples of what this can mean, following comments made in a previous iteration of the SA. However the wording in the objective is the only mention of urban cooling in the plan and it is not followed through into individual policies.

Consideration of the baseline situation for air and water quality before the allocation of new housing is important. Areas of known air and water quality problems can be avoided when the allocation of new housing is made so as not to exacerbate problems although sometimes these can be the trigger to a new solution being put in place (e.g. traffic management scheme paid for by developer). In the case of water quality it is assumed that new housing development could be constructed to current drainage standards etc so degradation of water quality should not occur.

Table 5.4: Compatibility of SA objectives with Core Strategy objectives

Plan Objectives → SEA Objectives ↓	1. Sustainability	2. Housing Growth	3. Local Housing	4. Economic Development	5. Rural Economy	6. Tourism	7. Felixstowe and Market Towns	8. Transport	9. Climate Change	10. The Coast	11. Protecting and Enhancing the Physical Environment	12. Design	13. Accessibility	14. Green infrastructure	15. Physical and Community Infrastructure
<b>1. To improve the health of the population overall</b>	✓ Integrated land use means more walking/cycling to work	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	✓ Risk to people mitigated	✓ Protects tranquil areas as an asset for local people.	0 Unrelated	✓ Better access to healthcare	✓ Promotes opportunities for a healthy lifestyle	0 Unrelated
<b>2. To maintain and improve levels of education and skills in the population overall</b>	0 Unrelated	0 Unrelated	0 Unrelated	✓ Economic development should have a positive effect on skills.	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	✓ Better access to education facilities.	0 Unrelated	0 Unrelated
<b>3. To reduce crime and anti-social activity</b>	0 Unrelated	0 Unrelated	0 Unrelated	✓ Policy targets economic development in deprived areas	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	✓ Aims to build in a manner which will minimise crime potential.	✓ More access to leisure facilities could be associated with drops in crime.	0 Unrelated	0 Unrelated
<b>4. To reduce poverty and social exclusion</b>	✓ Integrated development will recognise problem of poverty	0 Unrelated	✓ Considers needs of gypsies and travellers	✓ Policy targets economic development in deprived areas	✓ Policy targets alleviation of rural poverty	✓ More employment = less poverty	✓ Provision of employment facilities – reduces poverty	✓ Recognises need for private transport in area	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	✓ Aims to address deficiency
<b>5. To improve access to key services for all sectors of the population</b>	✓ Integrated development means key services will be available	✓ Identified the need for accessible services	✓ Identified the need for accessible services	✓ Supports small and medium sized businesses	✓ Promotes local business	0 Unrelated	✓ Seeks to sustain and enhance services	✓ Aims to improve public transport	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	✓ Aims to provide local facilities
<b>6. To offer everybody the opportunity for rewarding and satisfying employment</b>	✓ Integrated development will include employment opportunities	0 Unrelated	0 Unrelated	✓ Economic Development leads to more jobs	✓ Policy seeks to maintain rural jobs	✓ Aims to increase employment	✓ Recognises the importance of new employment	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	✓ Improved transport links allow people to commute to better jobs
<b>7. To meet the housing requirements of the whole community</b>	✓ Sustainable development looks at needs of whole community	✓ Ensures distribution of housing is balanced.	✓ Ensures distribution of housing is balanced.	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	✓ Aims to create developments that function to meet needs.	0 Unrelated	0 Unrelated	0 Unrelated
<b>8. To improve the quality of where people live and to encourage community participation</b>	✓ Sustainable communities aims for improved quality of life	✓ Identifies need for community facilities.	✓ Identifies need for community facilities.	0 Unrelated	0 Unrelated	0 Unrelated	✓ Aims to provide local facilities and community participation	0 Unrelated	✓ Aims to integrate social, recreational and economic actions	✓ Manage risk to property and people.	✓ Aims to enhance the culture and heritage of the area	✓ Aims to create a high quality living environment.	✓ More access to leisure facilities is positive for community participation.	✓ Aims to promote urban cooling	✓ Aims to provide local facilities
<b>9. To maintain and where possible improve air quality</b>	✓ Integrated land use means less car trips	✓ Housing developments can cause construction and subsequent resident traffic.	✓ Housing developments can cause construction and subsequent resident traffic.	✓ Industrial developments can cause construction and subsequent resident traffic.	✓ Industrial developments can cause construction and subsequent resident traffic.	✓ Increasing tourism may increase traffic	0 Unrelated	✓ Aims to reduce need to travel by car	✓ Encourages cleaner air and water.	0 Unrelated	0 Unrelated	✓ Aims to build efficient homes.	0 Unrelated	0 Unrelated	0 Unrelated
<b>10. To maintain and where possible improve water quality</b>	Sustainable development seeks to prevent deterioration & improve the water environment	✓ Housing development can cause water quality problems	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	✓ Encourages cleaner air and water.	✓ Aims to sustain coastal areas	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated

Plan Objectives → SEA Objectives ↓	1. Sustainability	2. Housing Growth	3. Local Housing	4. Economic Development	5. Rural Economy	6. Tourism	7. Felixstowe and Market Towns	8. Transport	9. Climate Change	10. The Coast	11. Protecting and Enhancing the Physical Environment	12. Design	13. Accessibility	14. Green Infrastructure	15. Physical and Community Infrastructure
11. To conserve soil resources and quality	✓ Sustainable development seeks to conserve natural environment	✓ Suggests allocations made sustainably.	✓ Suggests allocations made sustainably.	✓ X Employment developments may be on Greenfield land	✓ X Employment developments may be on Greenfield land	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated
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	✓ New housing could have SUDs and grey water recycling.	✓ New housing could have SUDs and grey water recycling.	✓ New developments could have SUDs and grey water recycling.	✓ New developments could have SUDs and grey water recycling.	✓ New developments could have SUDs and grey water recycling.	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	✓ Aims to build sustainable homes	0 Unrelated	0 Unrelated	0 Unrelated
13. To reduce waste	✓ Sustainable communities will aim to reduce waste	X More houses will mean more waste	X More houses will 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	✓ Aims to reduce waste	0 Unrelated	0 Unrelated	✓ Aims to build sustainable homes	0 Unrelated	0 Unrelated	0 Unrelated
14. To reduce the effects of traffic on the environment	✓ Integrated land use means less car trips	X More houses will bring more cars to the area	X More houses will bring more cars to the area	X More sites could lead to more traffic	0 Depends on sites identified.	0 Aims to manage traffic at tourism hotspots	X Increased activity may mean more traffic	✓ Aims to reduce trips	✓ Encourages alternative modes of transport	0 Unrelated	0 Unrelated	0 Unrelated	X More transport could lead to more traffic	0 Unrelated	0 Unrelated
15. To reduce emissions of greenhouse gases from energy consumption	✓ Sustainable communities will aim to reduce energy consumption	0 Unrelated	0 Unrelated	X Economic Development may mean more energy use.	X Economic Development may mean more energy use.	0 Unrelated	0 Unrelated	0 Unrelated	✓ Aims to minimise greenhouse gas emissions and use renewable energy	0 Unrelated	0 Unrelated	✓ Aims to build sustainable homes	0 Unrelated	0 Unrelated	0 Unrelated
16. To reduce vulnerability to flooding	✓ Sustainable development will avoid flood risk areas	✓ Suggests allocations made sustainably.	✓ Suggests allocations made sustainably.	X Employment sites may be on flood plains.	X Employment sites may be on flood plains.	0 Unrelated	0 Unrelated	0 Unrelated	✓ Aims to reduce vulnerability to flooding	✓ Aims to sustain coastal areas	0 Unrelated	✓ Aims to build sustainable homes	0 Unrelated	0 Unrelated	0 Unrelated
17. To conserve and enhance biodiversity and geodiversity	✓ Sustainable development will protect or enhance bio and geodiversity.	✓ Suggests allocations made sustainably.	✓ Suggests allocations made sustainably.* See 5.3	X Economic Development may have environmental impacts* 5.3	X Environmentally rich sites may be developed on.	✓ Aims not to compromise quality of natural environment	0 Unrelated	0 Unrelated	0 Unrelated	✓ Coastal environmental sites may be protected	✓ Aims to protect habitats	✓ Aims to build sustainable homes	0 Unrelated	✓ Supports biodiversity and geodiversity	0 Unrelated
18. To conserve and enhance appropriate areas of historical and archaeological importance	✓ Sustainable development will respect areas of historical and cultural value	✓ Suggests allocations made sustainably.	✓ Suggests allocations made sustainably.	✓ Economic Development may help maintain historic sites	✓ Economic Development may help maintain historic sites	✓ Possible maintenance of historic buildings	0 Unrelated	0 Unrelated	0 Unrelated	✓ Coastal historic sites may be protected	✓ Aims to enhance the culture and heritage of the area	✓ Aims to build sustainable homes	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	✓ Suggests allocations made sustainably.	✓ Suggests allocations made sustainably.	X Economic Development may change townscape character	0 Depends on sites identified.	X Redevelopment could change townscape	0 Unrelated	0 Unrelated	0 Unrelated	✓ Coastal historic sites may be protected	✓ Aims to reduce impact of new developments	✓ States townscapes should be celebrated.	✓ Aims to maintain rural settlements and services	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	0 Unrelated	0 Unrelated	✓ Seeks to provide economic growth	✓ Seeks to provide economic growth	✓ Aims for increase in tourism business	✓ Aims to provide economic growth	0 Unrelated	✓ Strategy for dealing with flood risk areas	✓ Protects Economic Assets	0 Unrelated	0 Unrelated	✓ Aims to maintain rural settlements and services	0 Unrelated	0 Unrelated
21. To revitalise town centres	0 Unrelated	0 Unrelated	0 Unrelated	✓ New businesses could help towns	0 Unrelated	0 Unrelated	✓ Aims to revitalise town centres	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	✓ States townscapes should be celebrated.	✓ Aims to maintain rural settlements and services	0 Unrelated	0 Unrelated

Plan Objectives → SEA Objectives ↓	1. Sustainability	2. Housing Growth	3. Local Housing	4. Economic Development	5. Rural Economy	6. Tourism	7. Felixstowe and Market Towns	8. Transport	9. Climate Change	10. The Coast	11. Protecting and Enhancing the Physical Environment	12. Design	13. Accessibility	14. Green infrastructure	15. Physical and Community Infrastructure
22. To encourage efficient patterns of movement in support of economic growth	✓ Aims to deliver integrated patterns of land use	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	✓ Tourism should be developed sustainably	✓ Encourages efficient patterns of movement	✓ Seeks to improve road network	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated
23. To encourage and accommodate both indigenous and inward investment	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	✓ Aims to foster towns	✓ Aims to foster towns	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	0 Unrelated	Improved transport infrastructure may increase investment ✓



## **SECTION C**

### **CORE STRATEGY POLICIES**

## 6. Appraisal of core strategy policies

### 6.1 Statutory purpose

In formal terms the Core Strategy Policies Development Plan Document is intended to fulfil the requirements of the Local Development Framework production process (i.e. the Regulation 26 stage under the Town and Country Planning Act (Local Development) (England) regulations 2004).

### 6.2 Links with national policy & other plans

The Core Strategy DPD is prepared in the context of national policy documents, specifically the Planning Policy Guidance Notes (PPGs) and Planning Policy Statements (PPSs), Government White Papers and planning circulars. It is not necessary to repeat national policy in the plan but it often needs to be interpreted in a local context or mentioned in the support text to assist the use of the document by potential developers. The scoping of documents undertaken for this appraisal, including those recently done by Suffolk Coastal District Council reveals the closest links with Suffolk and Suffolk Coastal Community Strategies, Haven Gateway Sub region documents, Suffolk Local Transport Plan, Coast and Heaths AONB Management Strategy and Suffolk Biodiversity Action Plan.

There are also links with the Core Strategies of neighbouring authorities Waveney, Mid Suffolk and Ipswich which border on to Suffolk Coastal. The most significant is with Ipswich Borough as it proposes a large housing allocation in the Northern Fringe. It is also a major employment and retail centre. Following the Examination of Ipswich's Core Strategy in May-July 2011, there is a proposal to potentially develop the Northern Fringe site as soon as an SPG is completed resulting in the construction of 1000 -1,500 homes before 2021 (Changes 2 & 3 of consultation on Proposed Focused Changes – August 2011). The cumulative effect of this allocation with Suffolk Coastal's proposal for the East Ipswich plan area has been considered in this assessment and can be found in Appendix 3, SP1 and SP20.

### 6.3 Core strategy policies and options

The SCDC's Core Strategy sets out its strategic approach to future development for the period to 2021. It sets out the principles as to where development of different scales should take place and the key factors that will need to be taken into account when considering individual development proposals. It has 18 strategic policies and a further 12 in the spatial strategy.

The core strategy policies appraised for their level of sustainability are set out in Appendix 2 and are extracted from Suffolk Coastal District Council's Consultation draft November 2010 plus Appendix 8 Policy Change Schedule included in the report to Cabinet February 2011. This is the fifth iteration in the sustainability appraisal process. In November 2007 a first draft of policies was appraised with options for individual policies. A sustainability report was prepared and Suffolk Coastal has taken on board most of the comments made. The response to the first SA is shown in table 6.1 of the October 2008 Sustainability appraisal. Tables 6.4 to 6.7. below summarises the actions taken as a result of the mitigation measures suggested following iterations of the policies.

The response to the consultation on the November 2010 version of the SA can be found in Table 3.2. The November 2010 Consultation was based on an SA document produced in June 2010 and updated in November 2010 to reflect the following changes made to the plan:

- delete references to the Regional Spatial Strategy (RSS)
- confirm the revised housing numbers using a new base date of 1<sup>st</sup> April 2010;
- pick up where possible changes proposed by national government e.g. Community Right to Build; marine plan and marine management organisation

- update factual information e.g. proposed hourly train service Ipswich to Saxmundham due to start December 2010; latest position re Sizewell etc
- other minor amendments/clarification
- specific reference included to evidence based documents where appropriate
- areas to be covered by Area Action Plans included after Key Diagram

The purpose of this SA is to consolidate these documents with the final amendments made by the Cabinet in February 2011 following consideration of the consultation results and updated SA. Some changes to the Plan have been made as a result of the comments made in the November 2010 update SA, the evidence of which is included in Table 3.3. It is noted that the status of the RSS has since been clarified.

#### **6.4 Consideration of Policy options/alternatives**

Policy options/alternatives have been considered at the following stages of plan preparation:

- Sustainability Appraisal of Core Strategy and Development Policies (Preferred Options) December 2007. This looked at the Core Strategy policies and alternatives. Some preferred policies did not have options because the area of concern had been discussed in the Issues and Options paper but no options set out. For these the “no plan” option was assessed which considered what would happen if existing policy (where it exists) and current trends continued.
- Core Strategy and Development Control Policies Preferred Options Sustainability Appraisal December 2008. In this document preferred options were identified for every policy and for some, several variants were tested looking at different numbers of housing allocations, or different geographical distributions. This considered 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 SA also included the summary of Strategic housing growth options in the Ipswich policy area (5 options) and Felixstowe Peninsula (6 options).
- Sustainability Appraisal of Core Strategy and Development Management Policies September 2009. Options were not presented in this report although in some cases policies changed so they were regarded as a further option to the previous ones assessed. A key role of this appraisal was to check the robustness of the basket of strategic core policies and development management policies as a whole. The SA 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.
- SAs in June 2010 and November 2010 looked at further amendments to policy wordings and 2,100 house allocations in Eastern Ipswich Plan area, 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 therefore that 100 new housing allocations have been taken out of other areas

In this SA Appendix 6 summarises the consideration of options through all these stages, documenting when decisions were made and summarising the reasons why particular choices were made, taking into account the SA conclusions, public consultation responses and political considerations. The most debated policies have concerned housing requirements and distribution and hence the following is an account of the decision-making history.

In 2007, the Council looked at future housing requirements for the district in the context of an emerging Regional Spatial Strategy (RSS). Alternatives were considered which sought to focus more development in the Ipswich Policy Area, or place greater reliance upon 'windfall' house building but the Council decided to agree the requirements of the RSS - [up to 2021] a minimum of 3,200 new houses in Ipswich Policy Area, and a minimum of 7,000 new houses in the remainder of the district (10,200 district total). This was considered the best approach to achieving sustainable development and was supported by the evidence base underpinning the RSS. There is also a legal requirement on local planning authorities to prepare Core Strategies which are in broad conformity with the RSS.

In 2010 following the need to plan for a 15 year supply of housing, and the Government's decision at that time to abolish the RSS's the Council undertook a review of the housing requirement need in the district. The review considered both local social and economic trends, together with the environmental constraints of the district. It was then decided to apply a minor reduction, with a commitment to an early review, to the overall housing requirement rate extrapolated from the RSS, so that the district housing requirements from 2010 to 2027 was identified at 7,590 new homes. The approach was considered to remain in broad conformity with the RSS.

In terms of the distribution of new housing, alternatives were considered in 2007 which restricted new developments to major centres only (Ipswich & Felixstowe), or promoted growth in major centres and market towns but restricted growth in rural villages. The Council decided on an indicative distribution which met the minimum housing targets [from the RSS] in the Ipswich Policy Area, sought to anchor significant regeneration opportunities at Felixstowe and deliver some remaining development to market towns and rural villages. This approach was considered to best orientate sustainable growth towards the larger communities, whilst also providing some growth stimulus to the rural areas.

The Council reviewed the housing distribution in 2009 and decided to amend the indicative distribution of new housing in the Core Strategy. This resulted in proposals to substantially increase new housing allocations in the Ipswich Policy Area and across rural areas, whilst reducing the short term housing requirement in Felixstowe. The expansion of housing numbers in the Ipswich Policy Area reflected greater confidence for the delivery of strategic employment opportunities in this area, together with, in consultation with the relevant infrastructure providers, the need to provide a 'critical mass' for a sustainable community. Increases in housing numbers in the rural areas were considered to provide better opportunity for smaller towns and villages to retain their vitality and/or secure affordable housing. For the Felixstowe area, there was evidence to suggest that there had been a lag in economic growth at the Port following the recession, but the Council still wished to see some growth here as it was a generally sustainable location and development would aid regeneration goals.

Some further modifications were made by the Council to the housing distribution following the review of the Core Strategy in 2010. A larger housing requirement was re-instated in Felixstowe in response to updated economic forecasts and in order to provide clarity of expected housing provision over the 15 year period. A further expected increase was proposed for villages in order to promote even greater opportunity for meeting rural needs. Hence this more dispersed approach to housing is appraised in the current SP2. The proposed housing distribution assessed in this appraisal is set out in Figure 6.1 – a table taken from the Reviewed Core Strategy document.

Figure 6.1 Extract from the Reviewed Core Strategy showing the proposed housing distribution

**Table 3.2 – Proposed housing distribution across the district 2010 to 2027**

From: 2010 - 2027	Eastern Ipswich Plan Area	Felixstowe Walton & the Trimleys	Market Towns	Key & Local Service Centres	Rest of District	TOTAL
Outstanding planning permissions (discounted by 10%)	220	290	430	440	100	1,480
Identified previously developed land	0	30	150	50	-	230
Outstanding housing allocations from previous local plan	0	0	0	80	-	80
Small windfall	Included in total to right	Included in total to right	Included in total to right	Included in total to right	540	540
New housing allocations	2,100	1,440	940	780	-	5,260
<b>TOTAL</b>	2,320 (136 p.a.)	1,760 (103 p.a.)	1,520 (89 p.a.)	1,350 (79 p.a.)	640 (37 p.a.)	7,590 (446 .a.)
% of new dwellings total	31%	23%	20%	18%	8%	100%

The Council considered the principles for strategic housing delivery in 2007 in the context of both draft RSS overall housing requirements, and an indicative district housing distribution. It was decided that in order to secure proper infrastructure delivery, one or at most two geographic sites/areas should be proposed in strategic settlements. The appraisals undertaken for strategic housing areas involved using slightly more specific criteria building on the SA framework. Hence they were separate appraisal to this overall appraisal of the plan, undertaken at a point in time to inform the detail of SP20 Eastern Ipswich Plan Area and SP 21 Felixstowe. The results for two iterations of this work, one in 2008 looking at 1000 houses in the Ipswich area and 1,670 in Felixstowe and one in 2010 looking at 2,000 in the Ipswich area only are in Appendix 8.

A range of broad geographic alternatives were considered in the Ipswich Policy Area for strategic housing provision, including areas around North Rushmere, north Kesgrave/Playford, South Kesgrave/Martlesham Heath and Purdis Farm. The results looking at the needs for 1,000 houses showed that all the suggested areas had drawbacks but areas South of Kesgrave and Martlesham Heath and South of Old Martlesham/ East of A12 had more disadvantages stemming from impacts on biodiversity and geodiversity, archaeology (Built form and heritage) and proximity to contaminated land. Development of the area on the Ipswich boundary between Westerfield and Rushmere needed to be considered in the context of longer term plans for the north of Ipswich. At the time of the appraisal a north Ipswich site was not included in the current draft Ipswich Core strategy proposals, it was identified as something to be considered post 2021. It was a concern that part development of the area could leave it poorly connected with existing transport links (e.g. south part of the area would not have easy access to the train station). The area north of the A12/14 had the lowest level of negative impacts overall but more uncertainties and using part of the area would set a

precedent for further development. The area north west of the A14 stood out because it met more of the core appraisal objectives and had slightly fewer uncertainties and more neutral impacts although the impact on the Suffolk Show Ground was a huge concern.

The further consideration of accommodating 2,000 houses in the East Ipswich area in 2010 suggested that the area South of Old Martlesham/ East of A12 was marginally the least sustainable. Again all areas had issues but the areas north west of the A14 and on the Ipswich boundary between Westerfield and Rushmere had slightly fewer concerns.

The Council decided that strategic housing growth in the Ipswich Policy Area should be in the area to the east of the A12 around Adastral Park, Martlesham. Whilst the area had been acknowledged to have particular environmental sensitivities, it was also considered to offer the greatest benefit in terms of creating an integrated sustainable community. The area was considered to be particularly advantageous due to the close proximity to existing key infrastructure facilities and a strategic employment site which was also considered for expansion.

A similar range of broad geographic alternatives were considered in the Felixstowe area for strategic housing provision, including areas around North-east of the A14, between the Trimley villages, between Trimley and Felixstowe (Walton), North of Felixstowe, North-east of Felixstowe and Innocence Farm, Kirton. The appraisal of the Felixstowe areas showed greater range than those of Ipswich. The area North of A14 east of Trimley St Martin primary school stood out with the highest numbers of negative scores, particular on the core objectives. Areas North east of the A14, North of Candlet Road and North of Felixstowe all scored poorly because of being greenfield and located north of the A14 and the existing built up area of Felixstowe. They would all start a precedent for development that could impact the visual quality of the Suffolk Coast and heaths AONB to the north east of the sites. The area between Trimley villages, north of the railway line and south of the A14 scored at a similar level to the better scoring Ipswich sites. However it had significant negative biodiversity concerns in terms of its potential impact on the Orwell estuary SSSI, RAMSAR, SPA and visual impact on the AONB. Part of the identified site closest to the A14 would have less of an impact on these qualities.

The area South of the Dockspur roundabout between Walton and Trimley St Mary had the lowest overall negative score making it the best location for development but it was noted that the size of the site was not actually large enough to accommodate the number of houses sought, at 30 per hectare. Concerns about air pollution linked to the proximity of the A14 at this site would need consideration but with improving car design features and tax incentives to take the most polluting forms of transport off the road, this may not be a problem in the longer term. This site with some of the land between the Trimley villages would be large enough to accommodate 1670 houses.

Following extensive discussion in the reporting process, the Council agreed a strategic approach for housing in Felixstowe which involved the dispersal of housing developments over the wider Felixstowe area, avoiding prime agricultural land where possible. The approach was considered to represent the best interests of the local area, providing regeneration opportunities and diluting adverse impacts across a wider area.

## **6.5 Policy appraisal results**

The aim of this appraisal is to set out the main sustainability implications of each policy and to consider the set of policies as a whole. This enables the need for any possible mitigation actions to be identified.

The policies were assessed against previous versions published in the July 2009 and 2008. This final version of the SA is an update and consolidation of the version produced in

June 2010 plus later minor policy wording updates and taking into account the results of consultation in 2011. Where wording has not changed, the previous assessment has been used. The 23 SA objectives listed in the previous chapter were used, using the scoring system in Table 6.1. For each SA objective the impact on the indicators associated with them (see Appendix 1) 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
Blank	No notable positive or negative effect

The 30 core strategy policies appraised produced a total of 248 positive impacts (of which 68 were strong positives and 180 were single positives), 56 negative impacts (of which all but 6 were single negatives). The following comments concern the sustainability of the final wording of policies, comparing them to previous versions.

It is expected that this version of the policies will show a higher level of sustainability than in July 2009. Options for policies are not presented in this report. A key role of this appraisal is to check the robustness of the basket of strategic core policies and development management policies as a whole. Table 6.2 below is included to assist comparison with the July 2009, June 2010 and this final consolidated version of the sustainability appraisal. Note policy numbering changed between July 2009 and June 2010. Only policies that have changed score are shown for 2011, all other scores remained the same as in June 2010.

When compared to the sustainability appraisal score at the July 2009 stage of core strategy policies, 9 policies improved in their sustainability, whilst 2 have worsened in June 2010. All policies (with the exception of SP3 New Housing) now score positively. Only 3 policies changed scores in the June 2011 update.

*Table 6.2 Comparison with previous appraisals*

New Policy No.	Policy score Nov 2011	Policy score June 2011	Policy Score (June 2010)	Policy Title	Old Policy Number (July 09)	Old Policy Score July 09	Difference June 2010 – July 2009
<b>THE CORE POLICIES</b>							
SP1	29	28	27	Sustainable Development	SP1	27	0
SP2	8	7	7.5	Housing numbers	SP2	3.5	4
SP3			-1	New Housing	SP3	-1	0
SP4			5	Gypsies, Travellers & Travelling Show persons	SP4	5	0
SP5	3.5		4.5	Employment Land	SP5	4.5	0



SP6	8	9	Regeneration	SP6	7	2
SP7		5.5	Economic Dev in Rural Areas	SP7	5.5	0
SP8		6	Tourism	SP8	3	3
SP9		3	Retail Centres	SP9	3	0
SP10		3	The A12 and A14	SP10	-1	4
SP11		10.5	Accessibility	SP11	6.5	4
SP12		15	Climate Change	SP15	15	0
SP13	15	16	Nuclear Energy	SP14	16	0
SP14		10	Biodiversity and Geodiversity	SP12	10	0
SP15		7.5	Landscape and Townscape	SP13	7.5	0
SP16		8	Sport and Play	SP16	8	0
SP17		7.5	Green Space	SP17	6	1.5
SP18	13	12	Infrastructure	SP18	12	0
<b>The Spatial Strategy</b>						
SP19	10.5	11.5	Settlement Policy	SP19	11	0.5
SP20	0	0.5	Area East of Ipswich	SP20	0	0.5
SP21		14.5	Felixstowe	SP21	15	-0.5
SP22		8.5	Aldeburgh	SP22	8.5	0
SP23		7.5	Framlingham	SP23	7.5	0
SP24	4.5	3	Leiston	SP24	3	0
SP25	0.5	1	Saxmundham	SP25	1	0
SP26		8.5	Woodbridge	SP26	8.5	0
SP27		7.5	Key Service Centres & Local Service Centres*	SP27	6.5	1
SP28		12	Other Villages	SP28	12	0
SP29		1	New Housing in the Countryside*	SP29	7	-6
SP30		6.5	The Coastal Zone	SP30	6.5	0

As Table 6.2 shows as a result of the November 2011 update following the public consultation on the SA for 6 weeks to October 2011, 9 scores changed. The changes were mainly to water quality and historic environment scores, reacting to comments made by the Environment Agency and English Heritage. The commentary below primarily reflects the results of when the policy wording was last changed (June 2011 compared to June 2010). Additional comments have been added where changes have been made following the 6 week consultation to October 2012 on the SA.

### **The Core Policies**

#### **SP1 Sustainability**

The policy scores higher than when previously assessed in July 2009, November 2010 and June 2011. As would be expected given the subject matter, it is assessed as having strong positive impacts on the highest number of SA objectives: 10 in total spread across social, economic and environmental topics. As a result of the addition of a further point to the strategy for achieving sustainable development in June 2010, the policy now scores a strong positive for SA 12 efficient use of water and mineral resources with the addition of reference to sustainable methods of construction. In November 2011 as a result of comments by the Environment Agency the neutral impact on water quality was revised to a positive to reflect

the fact that the policy wording stated that development will be supported by the provision of appropriate infrastructure, which will help to protect the water environment. This was considered to warrant a “positive” effect (not strongly positive) because the emphasis is on protecting not improving water quality however it is recognised that upgrades to existing infrastructure at capacity are likely to result in improved effluent standards and hence water quality in the environment. The only indicators which the policy did not score a positive for, were for alleviating crime and anti social behaviour and improving health. Both these factors should improve as a secondary effect of the range of other strong positive impacts expected to result from the policy. There were no negative impacts identified hence no mitigation is required. In November 2010 “best of the areas” was added to criteria (j) of the policy concerning conserve and enhance the natural and built environment. This was deleted following comments in the previous SA update and on reviewing the policy now it is considered that the mention of environmental capacity plus the confirmation that the plan will consider conserving and enhancing all areas not just the best, justifies a stronger significant impact score on SA objective 17 To conserve and enhance biodiversity and geodiversity.

### **SP2 Housing numbers**

The sustainability of this policy has increased following the 6 week consultation to October 2011 compared to the previous versions and is positive overall. Addition of wording that explicitly mentioned the provision of new and improved infrastructure associated with new development, resulted in positive scores for improving education and skills, improving the quality of where people live, reducing vulnerability to flooding and to maintain and improve water quality. A positive impact on SP16 To reduce vulnerability to flooding is given because this policy looks at the strategic distribution of housing, seeking to avoid allocations in flood risk areas and to be of a scale that would justify designs to reduce flood vulnerability (e.g. SUDS that could be of broader benefit to communities). The latest updating of the numbers, reducing the total by 70 does not make a significant change to the assessment of the policy. The slight increase in Felixstowe and the Trimleys is proportional to the size of the existing development. The proposed government policy of Community Right to Build is mentioned several times in the plan and it is suggested that this could result in additional housing in small villages. This potential policy sits outside the LDF system and is determined by a 75% majority agreement of the community. It is not appropriate to sustainability appraise it because the plan policies are not key determinants.

However new information on the potential impact of the level of housing growth proposed raises concerns for disturbance of birds, specifically Nightjars named in the Sandlings SPA designation. This has been reflected in this latest update, confirming that the likely overall impact of the housing numbers proposed on SA 17 is likely to be negative, where previously there was more uncertainty. Mitigation for this will be required, involving management of visitor numbers at popular destinations and as suggested in the Appropriate Assessment, the creation of a new country park (or similar high quality provision) in the north Ipswich area to relieve some of the pressure on the SPA designations in the Ipswich/ Woodbridge area.

Concentrating development in the IPA is considered a sustainable strategy for a number of reasons:

- The employment offer in Ipswich is larger and more diverse than Felixstowe (where dependence on port related activities and commuting to Ipswich could be an issue).
- There is the opportunity to create sustainable settlements with distinctive identity with smaller distinguishable villages, neighbourhoods and communities.
- Public transport provision, foot and cycle paths to Ipswich are already well developed.

In November 2011 as a result of comments by the Environment Agency the neutral impact on water quality was revised to a positive to reflect the fact that the policy wording stated that development will be supported by the provision of appropriate infrastructure, which will help to protect the water environment. This was considered to warrant a “positive” effect (not strongly

positive) because the emphasis is on protecting not improving water quality however it is recognised that upgrades to existing infrastructure at capacity are likely to result in improved effluent standards and hence water quality in the environment.

### **SP3 New homes**

Although the sustainability of this policy has improved over the various iterations of the plan, it is still slightly negative on balance. The provision of new housing will produce significant positive social outcomes in relation to social objectives. However new development will be additional to existing stock, catering for population growth that will provide additional traffic, waste and have energy needs. These needs will be minimised by the implementation of other policies in the plan that articulate the principles of sustainable development (e.g. SP1, SP12 Climate Change seeks to minimise waste production, encourage renewable energy and minimise flood risk, DM24 Sustainable construction, DM21 Design Aesthetics encourages renewable energy provision, DM22 Design function encourages water conservation, and permeable soakaways to deal with excess runoff). Similarly proper investigation will be needed where it is suspected that there are archaeological assets. Hence no further mitigation is required but it is unlikely that the impacts will be completely neutral.

As this policy mentions use of existing stock through conversions, adaptation or extensions, SP16 To reduce vulnerability to flooding was given a negative score because extensions to individual homes may be allowed in areas now defined as being in flood risk. It is acknowledged that the policy states that provision will be made in accordance to the principles of sustainable development, but SP1 does **not** specifically mention the need for development to avoid areas of flood risk.

SP4 Gypsies, travellers and travelling show people

No negative impacts on sustainability identified. The policy needs to be considered with DM9.

### **SP5 Employment Land**

The net sustainability of this policy had improved over the iterations of the plan although following updating stemming from the results of the public consultation in October 2011 it has dropped down slightly but is still positive overall. The policy is considered to perform very well in meeting economic objectives. Further impacts will be expected to have possible negative issues with environmental protection, air and water quality and energy use, as well as waste. The latest updating has noted that employment development can cause more demand for waste water disposal, putting pressure on facilities that are already at capacity leading to lower standards of effluent and this policy has then scored negatively because it does not say that infrastructure needs will be taken into account. The policy also proposes strategic employment development in Felixstowe, an area of flood risk (see Figure 4.16) but due to the scale, flood control will have to be included that could benefit a wider area. However at the same time development on existing small employment sites could increase runoff and increase flood risk, hence the positive and negative score for SA objective 16 To reduce vulnerability to flooding. In order to mitigate against negative environmental impacts, the suite of core strategy and development management policies should ensure that development is undertaken in a sustainable manner in terms of minimising impact. SP 1 specifically notes that development must take place with regard to environmental capacity and ensure the provision of appropriate infrastructure to support communities.

### **SP6 Regeneration**

This policy has improved in its level of sustainability due to increased positive impact. The policy wording contains references to reducing the reliance on the Port in Felixstowe and regeneration in Saxmundham. These will provide a wider range of job opportunities in these towns so the policy scores positively on offering employment and encouraging efficient patterns of movement in support of economic growth as it could reduce the need for commuting.

It is important to consider the issue of potential traffic generation when assessing regeneration proposals, as well as rising sea levels in coastal areas such as Felixstowe. The policy includes reference to regeneration in Leiston with the decommissioning of Sizewell A adding to the impact of the decline in local engineering, but does not mention the potential regeneration opportunities that may be available as a result of the anticipated Sizewell C development. The policy wording concentrates more on economic regeneration specifically, although issues such as social deprivation are highlighted in the supporting text and there is a reference to limited community facilities in Saxmundham in the policy. Regeneration in Felixstowe also needs to take into account the historic environment.

### **SP7 Economic Development in Rural Areas**

In general this is a sustainable policy although there are risks associated with air pollution and waste. People are generally healthier and crime is generally lower in economically successful areas, so there is a chance for a positive secondary effect here. Retaining existing employment sites saves having to develop new ones, which uses minerals and energy as well as generating traffic in the construction phase. This is a short term impact. When considering the influence of other policies, the negative impacts of this policy should be mitigated against.

### **SP8 Tourism**

This policy has become more sustainable in its final format. The reference to “green tourism” including the use of public transport by visitors now included in the policy wording results in a number of improved scores on sustainability indicators. As a result of the final policy wording, the policy now scores only a weak negative on reducing the effects of traffic on the environment and reducing emissions of greenhouse gases from energy consumption, and positively impacts upon encouraging efficient patterns of movement in support of economic growth. It is also considered that increased revenue from encouraging tourism could ultimately aid the upkeep of historic and archaeological sites. In conjunction with SP6 Regeneration, the plan provides encouragement for reversing the fortunes of the tourism industry in Felixstowe. In terms of mitigation biodiversity and habitat assessments should be undertaken fully before any development is implemented, along with ensuring that noise and air pollution will be avoided.

### **SP9 Retail Centres**

This policy has not changed in terms of assessment results since the preferred options stage. It is generally sustainable policy with no negative impacts forecast. It should be noted however that in the short term, construction traffic could impact the local areas; hence this should be considered when planning developments.

### **SP10 The A14 and the A12**

This policy has become slightly more sustainable as the plan has developed. Additional roads and/or traffic will inevitably have a negative impact on environmental factors; however, the economic benefits of providing better access to areas in need of regeneration are extremely important and in the context of other objectives might be given significant weight. Negative impacts associated with this policy are related to the potential for increased traffic from proposed increasing road capacity, which is now considered to be a strong negative in light of the latest wording of this policy which includes reference to improvements on the A14 and A12. This can be mitigated against through the promotion of sustainable transport, walking and cycling and limiting car parking / ownership.

### **SP11 Accessibility**

The policy wording has changed considerably in the November 2010 version of the plan, and is significantly more sustainable as a result of these changes. The policy increases its sustainability on health, poverty and social exclusion, the quality of where people live, air quality, the effects of traffic and greenhouse gas emissions (for the purposes of this appraisal,

reduction of greenhouse gases from energy consumption is considered to include petrol) as a result of its aim to reduce local journeys made by the private motor cars and transfer freight from road to rail. However, the policy seems to put a great deal of emphasis on changing the travel habits of local people, with little attention given to through traffic and business movements aside the transfer of freight from road to rail. The policy also makes no mention of demand responsive transport, which may be a realistic option in rural areas. The supporting text also only infers scheduled services on bus routes are the solution to accessibility problems. Reducing the impact of traffic on the environment and giving the community easy access to essential services and facilities such as cycle storage are key messages emerging from this policy. No negative aspects have been recorded.

### **SP12 Climate change**

This policy was previously listed as SP15 – no policy wording has changed at this stage of the plan. It is a highly sustainable policy with no negative impacts associated with it. However the policy wording only mentions mitigation of climate change when it does in fact refer to adaptation. Addition of the word adaptation would help build on SP1.

### **SP13 Nuclear Energy**

This policy was previously listed as SP14 – no policy wording has changed at this stage of the plan preparation. Overall, the level of sustainability embedded in this policy has increased greatly as the plan has been revised. Concern for residential amenity means that air quality impacts of traffic will be considered. Negative impacts are associated with the policy in that there is a risk of radioactivity leakage that would raise fears for the health of the local community. Green field land would be used for the development of a new plant and in the short term for construction needs. Storage of nuclear waste on site is a long term concern and may add to the terrorist threat. Mitigation as suggested in earlier reports is to monitor radioactivity levels in the environment and to maintain a no development zone in the immediate vicinity of the Sizewell site.

Following comments by the Environment Agency the impact on water quality has been reconsidered and updated from a positive to a one of positive and negative impacts. The Environment Agency pointed out that there could be a potential negative effect on water quality and the downstream Minsmere and Walberswick Special Protection Area (SPA) because waste water flows generated by the proposed housing and employment will take the flows discharged through the Leiston sewage works beyond the current volumetric permit (Haven Gateway Water Cycle Study Stage 2, November 2009). However the policy expressly says it will consider the ecological impacts on nearby designated sites so it considered that the risk of threat to the SPA will be low.

### **SP14 Biodiversity and Geodiversity**

This policy was previously listed as SP12 – no policy wording has changed at this stage of the plan. This policy has become more sustainable as the plan has evolved. The policy contains wording that suggests protection will be given to landscape character which is important as large parts of the District have AONB designation. Particular landscape characters can be associated with particular types of biodiversity and geodiversity. In general it is a very sustainable policy that has been strengthened for geodiversity by adding reference to the Suffolk Local Geodiversity Action Plan. There were no negative impacts identified hence no mitigation measures are considered necessary.

The Environment Agency in a consultation response in October 2011 have commented that they felt it unfortunate that this policy does not make a reference to water quality specifically, the physical characteristics of the water environment (morphology) or the importance of

groundwaters: this is particularly in light of the District Council's responsibilities under the Water Framework Directive, i.e. that Regulation 17 of the Water Environment (WFD)(E&W) Regulations 2003 places a duty on each public body including local planning authorities to 'have regard to' river basin management plans.

### **SP15 Landscape and Townscape**

This policy was previously listed as SP13 – no policy wording has changed at this stage of the plan. Overall, this policy has become more sustainable through various the iterations of the plan. The policy contains specific wording related to the AONB and protecting and enhancing architectural value; hence positive scores are attained on this criteria. It was considered that there was a potential limit on the opportunities represented though change, where this is through development or land management i.e. lack of options to enhance or diversify where compatible in order to achieve social or economic objectives. However there are long term benefits to conserving landscape and townscape assets particularly for Suffolk's distinctiveness of place and tourism.

### **SP16 Sport and Play**

Minor alterations to the policy have resulted in no changes in sustainability at this final stage of appraisal. The policy is a sustainable one which clearly states that it will protect and enhance formal and informal sport and recreation facilities (in addition to provide new and improve existing facilities). No negative impacts are forecast from the implementation of the policy, hence no mitigation required.

### **SP17 Green Space**

This policy has become more sustainable as the plan has developed. The provision of well-managed access to green space is the basis for a sustainable policy as it is positive for both social and environmental criteria. The addition of specific reference to provision of green infrastructure in strategic housing growth areas increases the sustainability of the policy in a range of social and environmental indicators. Large scale housing growth can impact negatively on soil resources and flood risk, but green infrastructure suitably complementing the development can go some way to mitigating against these problems. This change also results in the policy scoring a strong positive for improving the quality of where people live. The policy is not clear in its role of enhancing biodiversity which is a missed opportunity where new green space is being developed, hence the reason why it does not score strongly for SA objective 17 to Conserve and enhance biodiversity.

### **SP18 Infrastructure**

Minor alterations to the policy in November 2010 resulted in no changes in sustainability at this stage of appraisal however following the 6 weeks consultation to October 2011 the score for water quality was adjusted to reflect comments made by the Environment Agency that the provision of improved infrastructure will result in higher standard effluent being released in water courses in some cases. It is a sustainable policy with no associated negative impacts.

## **The Spatial Strategy**

### **SP19 Settlement Policy**

The final version of this policy is slightly less sustainable than that appraised in November 2010 due to the findings of the Appropriate Assessment that associates this distribution of housing with a 2%- 5% cumulative impact with Ipswich Borough's housing proposals on the European designated sites in the Suffolk Coast and Heaths AONB. Mitigation will be required, in the form of demand management and provision of green space that should be achieved by other policies in the plan. The wording of the policy has not changed, but there are changes to the proportion of development in settlement type area. It is understood that the apparent allocation of 8% housing to Other Villages and countryside is actually windfall development

that will be distributed throughout the District. The distribution of development is considered to be sustainable in meeting the housing demands of the whole community, scoring a strong positive on this objective. However, the policy does not consider the impact of the redistribution of schools following the Schools Organisational Review. This is of particular concern in the Leiston and Saxmundham area, where the middle schools are scheduled to close in September 2012 and primary schools will take two more year groups. This results in a potential slight negative on the education and skills SA objective.

### **SP20 Ipswich Policy Area**

The latest version of this policy is marginally more sustainable. This is because the policy now seeks to preserve and enhance environmentally sensitive locations in this extremely sensitive area and in particular notes the creation of a countryside park on the Foxhall tip by the end of the plan period. Previous iterations of the sustainability appraisal, site specific assessment and appropriate assessment have all highlighted the concerns over allocating housing east of the A12 at Martlesham due to the close proximity of the Deben Estuary RAMSAR/SPA. The latest version of this policy attempts to mitigate against these potential problems.

However, the cumulative impact of this policy with that of CS10 in Ipswich Borough Council's Core Strategy also needs to be considered. Ipswich Borough have amended their policy post their Examination in May – July 2011 to allow the development of 1,000 to 1,500 houses before 2021 in the Northern Fringe once an SPG has been prepared. The cumulative effect of this has been studied in some detail in the Appropriate Assessment and it has been concluded that due to the potential recreational pressure for dog walking, a range of mitigation measures are required to adequately preserve and enhance the environmentally sensitive areas. These include adequate provision of open space within developments to provide alternative recreational opportunities, including areas suitable for walking dogs off their leads; provision of a new country park or similar high quality provision and provision of wardening and visitor management measures, guided by a visitor management plan to manage and monitor recreational access and birds on designated sites.

Hence the proposed Area Action Plan will need to safeguard the designated areas to preserve the wildlife and habitat of the estuary, considering the impact of the distance of developments from existing sites but probably ensuring development is at least 1km from the Deben SPA, by providing open space as part of the housing development at the beginning of the development (because Foxhall Country Park is unlikely to be developed within the plan period) and consider the congestion and traffic impacts for popular recreational destinations in the area (e.g. Waldringfield). Natural England have commented (Letter 14 October 2011) that while ensuring development is more than 1 km from designated sites clearly reduces the risk of recreational disturbance, it does not necessarily follow that a development that is closer than this, would result in an unacceptable level of disturbance, particularly if adequate mitigation were provided. A site specific appropriate assessment will also be required. The SA has highlighted that paths shown on OS maps are not currently available for walks along the estuary shoreline north and south of Waldringfield, providing protection of bird habitats from disturbance.

### **SP21 Felixstowe**

This policy is declined in sustainability, albeit very slightly as a result of the June 2010 appraisal. This is because of the addition of a priority to achieve access to green space, including countryside, which raises concerns for biodiversity. The policy already scored positively in terms of its social and health impacts and the additional access to green space and countryside does not further increase its sustainability. The constraints posed by nature conservations designations in the area are recognised but proposed new access to green space and countryside could potentially negatively impact upon habitats and biodiversity.



#### SP22 Aldeburgh

The policy is clear that there will not be structural level growth and this resulted in a positive sustainability score. No further mitigation is required.

#### SP23 Framlingham

Overall the policy is has become more sustainable through the iterations of the plan. No further mitigation is required.

#### SP24 Leiston

Overall this is a sustainable policy, with some environmental concerns (that will be mitigated against by other policies) contrasting with social and economic positives. There is a possible slight negative impact because the waste water flows generated by the proposed housing and employment will take the flows discharged through Leiston sewage works beyond the current volumetric permit (Haven Gateway Water Cycle Study Stage 2, November 2009). The Environment Agency have commented that the discharge permit for Leiston sewage works is due to be tightened by March 2015 to operate under the current economic limit of treatment in order to meet the requirements of the Habitats Directive, to conserve the features of the downstream SPA. As the works will be operating at the current economic limit of treatment, it may not be economical in the future to further tighten the quality limits in order to off-set the impacts of increasing the volumetric limit to accommodate the proposed growth.

It is also noted that the Schools Organisation Review is likely to result in the High School for the area being in Leiston and the Middle Schools in Leiston and Saxmundham closed. The policy for Leiston now clearly states that the circumstances of nuclear safeguarding limit the future expansion of the town to the east; whilst in Saxmundham current Local plan outstanding allocations will go ahead. This raises the need for improved sustainable transport links between the two towns. The policy now includes a statement that recognises the need for improved public transport links between the town and the rural catchment area.

#### SP25 Saxmundham

This policy achieves a slightly positive score, with a number of environmental concerns, particularly surrounding outstanding allocations for residential development by the River Fromus, which could create open space and regenerate the town centre but is in a flood risk area. The constraint of flood risk is recognised in the policy. Careful planning and design of residential development and open space in this area could mitigate and minimise the flood risk.

A possible slight negative impact on SP 10 (To maintain and improve water quality) has been added in November 2011 following comments from the Environment Agency who pointed out that there is insufficient infrastructure in the area to deal with waste water flows generated by the proposed housing and employment. Timing of development may be important as if Sizewell C were to go it could help upgrade infrastructure. In the meantime some sites in Saxmundham and Leiston might not economic to develop for housing or employment. This situation would need to be carefully monitored as it will impact the ability of the plan to meet its housing and employment aspirations in the longer term.

As mentioned above the nearest High School in the area is likely to be at Leiston leading to more trips and a need for consideration of improvement to cycling, walking and public transport links between Leiston and Saxmundham in the longer term. School transport services may serve the majority of pupils but could disadvantage those wishing to take up extra curricula, after school, sporting opportunities, hence the need for flexible sustainable transport provision. However, the policy does score strongly on social and environmental SA objectives.

#### SP26 Woodbridge

This is a strongly positive spatial policy, with clarification that only modest expansion would be allowed depending on environmental constraints generally helping the sustainability of the policy. However mention of Woodbridge as a 'gateway' to the AONB raises concerns that tourist traffic might be channelled through the town. In terms of the cumulative effect on the AONB this could be beneficial as it allows traffic management but it also suggests a cumulative effect (modest new development and tourism traffic) that might need mitigation in Woodbridge which currently has an Air Quality Management Area.

#### **SP27 Key and Local Service Centres**

This policy improved its sustainability slightly as a result of the addition of wording permitting small housing development allocations where proven local support exists in June 2010.

#### SP28 Other villages

This is a sustainable policy that recognises the social, economic and environmental dimensions of the countryside and smaller settlements. No mitigation necessary.

#### **SP29 The Countryside**

The wording of the policy put forward in June 2010 is more strategic in nature with the detail of the policy now found in DM3. As a result, this policy has been re-appraised and is significantly less sustainable (though still scoring positively) as the new wording does not include detail of how new housing in the countryside will be restricted. The policy seeks to protect the countryside for its own sake, which will benefit biodiversity and geodiversity and help preserve landscape quality. Aside from these positive impacts, the appraisal found that the policy had no impact on the remaining 21 of the 23 SA objectives.

#### **SP30 The Coastal Zone**

This is a sustainable policy. It seeks to safeguard property; hence contributing to meeting and maintaining the housing resources for local communities. There were no negative impacts anticipated which would require mitigation. This policy should allow for the necessary adaptation of the living environment in the coastal zone, including the "roll back" of housing and services should it become necessary.

#### **Overall results**

Table 6.3 summarises the overall results of the appraisal of all the preferred policies. Blank boxes in the table indicate that a neutral result was recorded in the appraisal. This means the application of the policy should not have a noticeable effect on the SA objective. The table is easier to read if blanks are not marked with zeros. The full results for each policy option can be seen in Appendix 2. Appendix 2 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.

Three changes have been made to the policy scoring as a result of this latest update in June 2011 to the SA. SP1 Sustainable Development is now thought to justify a significant positive score for SA 17 Biodiversity and Geodiversity because of the policy's recognition of the need for regard to environmental capacity, the limits to which have been highlighted in the Appropriate Assessment. SP2 New Homes and SP19 Spatial Strategy have been updated with negatives for SA17 Biodiversity and Geodiversity again as a result of the findings of the Appropriate Assessment as this tested the total number of houses and the proposed distribution (in combination with the Ipswich Borough Core Strategy) and concluded that it was not possible to say that there would be no impact on the integrity of European sites in the Suffolk Coast and Heath AONB in the absence of mitigation.

Table 6.4 reveals the strengths and weaknesses of the core strategy policies as a set, hence as a plan. We would expect to see SP1 Sustainability (+28) with the highest score given its

subject matter. Seven other policies scored over +10, an increase on the six such policies achieving this score at the previous stage of the appraisal. These are; SP13 Nuclear energy (+16) because it includes a large range of local social, environmental and economic issues; SP12 Climate change (+15) because it scores very strongly on the environmental sustainability criteria; SP21 Felixstowe (+14.5) because of its focus on regeneration to meet the needs of local people and (new to the policy wording) increasing access to green space; SP18 Infrastructure (+12) because it seeks to provide or improve services including schools, social facilities and employment that could also bring jobs; SP28 Other villages (+12) because it sets out environmental constraints and considers cumulative impacts, SP19 Settlement policy (+10.5) because of its focus on delivering housing in a manner according to the principles of sustainable development and SP11 Accessibility (+10.5). The latter has been thoroughly revised over the course of plan preparation and as a result has risen above the +10 threshold due to increased reference to reducing local car journeys, improving provision for walking and cycling, improved quality and quantity of public transport and transferring freight from road to rail.

Only one policy now scores negatively for overall sustainability, and this was only slightly negative, scoring -1. This is compared to two policies scoring negatively at the last stage of appraisal, although both of these only scored -1. The single policy still scoring negatively is Core Policy SP3 New homes. The policy does not have any strongly negative impacts, but generally scores negatively on environmental SA indicators, such as reducing waste, reducing the effects of traffic on the environment and reduction of emissions of greenhouse gases from energy consumption. However, SP3 has strong positive scores for improving access to key services for all sectors of the population and meeting the housing requirements of the whole community, but inevitably scores poorly on environmental indicators as a free standing policy that is dealing with land uses that by definition will use greenfield land and result in new energy consumption and waste production. Other policies in the plan will seek to minimise the level of impact in these areas so it is not a huge concern.

Overall due to the small changes made in this June 2011 update, the overall sustainability of the core strategy policies as a group has reduced very marginally largely as a result of recognising the results of the Appropriate Assessment.

### **6.6 Significant effects of the core strategy policies**

Table 6.3 shows that the policies likely to have greatest impact are conserving and enhancing the quality and local distinctiveness of landscape and townscapes (SA19 +27.5), achieving sustainable levels of prosperity and economic growth throughout the plan area (SA20 +26.5), offering rewarding employment (SA6 +24.5), improving access to key services (SA5 +24) and reducing poverty and social exclusion (SA4 +23). The policies are well focused on meeting the housing needs of the whole community (SA 7+22.5, 6<sup>th</sup> overall).

All economic SA objectives score strongly positive, ranging between +9 for SA 21 to revitalise town centres to second the highest score of any objective; +26 for SA 20 to achieve sustainable economic growth throughout the area, which has even become slightly more sustainable in this appraisal. There are only four SA objectives under the economic heading but all have at least one policy that scores strongly suggesting a significant impact. In a set of core strategy policies it sometimes only needs one policy to score high as this indicates that there is a policy devoted to this area and will be applied alongside other policies. Also notable is the fact that none of the economic objectives score negatively on any policy. There is a single +/- score for SP 15 Landscape and Townscape on SA 20 to achieve sustainable levels of economic growth throughout the plan area, because protection of these assets may prevent economic development on some occasions.

There is a slightly mixed picture for the eleven environmental SA objectives. The set of policies clearly reflect and reiterate a concern for conserving and enhancing the quality and

local distinctiveness of landscapes and townscapes, which achieves the highest score of any objective (+27.5). Positive scores are also recorded for seven further environmental SA objectives. In total, seven policies improved in their sustainability in the June 2010 SA, although two of these remain negative in their outcome. The first of these is SA 9 air quality, which has improved its sustainability by 1.5 points with an increased positive score in SP 11 Accessibility and a new positive on SP 17 Green space. The second of these objectives is SA 15 reducing emissions of greenhouse gases from energy consumption, which becomes 1.5 points less negative through the more sustainable nature of SP 11 Accessibility (particularly the aims to reduce local car journeys and transfer freight from road to rail) and SP 8 Tourism (the reference to “green tourism” improves the sustainability of this policy). Two other policies also remain negative. SA 14 to reduce the effects of traffic on the environment remains slightly negative (-1.5) and SA13 To reduce waste (-10).

SA 9 to maintain and where possible improve air quality (-2) became more sustainable in the June 2010 appraisal, due to a strengthened positive impact from SP11 Accessibility and a new positive impact resulting from SP17 Green space. SP11 commits to reducing the proportion of local journeys taken by private car and the transfer of freight from road to rail, which should help to maintain or decrease the impact of transport on air quality. SP17 includes the priority to create green space to complement strategic housing growth, which would provide vegetation in built up areas which will be positive for air quality. SA 9 is closely related to SA 14 above. The main air quality issues in Suffolk Coastal are associated with traffic and one Air Quality Management Area is designated in Woodbridge/Melton. As several policies will result in the generation more traffic, air quality could be an issue. SP12 Climate change seeks to minimise the risk of pollution which could include air quality although it is not explicit. Other policies seeking to reduce the need to travel (SP1), or manage traffic (SP26 Woodbridge) will benefit air quality.

To maintain and improve water quality (SA 10) is not the focus of any particular policy in the plan but it is thought that water quality will be a consideration in achieving SP 14 Biodiversity and geodiversity. This policy seeks to protect the biodiversity associated with rivers, estuaries and coast and as water quality will be a key factor in the survival of some species, water quality will therefore be need to be conserved. The Environment Agency recommends that this policy could be strengthened to make the link to maintaining and improving water quality more specific. However for the purposes of the sustainability appraisal it is not thought that the absence of this wording does not mean this will not be achieved. Furthermore there are other policies (SP1 and SP2) that seek to take account of infrastructure needs and will ensure that housing growth is in line with environmental capacity – which will include water resource availability and safe drainage. Housing and employment growth may put pressure on existing water supply, sewage and drainage systems (particularly in East Ipswich and Felixstowe) but it has been assumed in this appraisal that timely new investment will take place before any development is inhabited, thus ensuring no negative implications will result. In the case of Leiston it may not be able to contribute to the housing needs of the District until Sizewell C goes ahead, contributing to the costs of investment in infrastructure.

Similarly SP 12 Climate change considers minimising the risk of pollution and minimising the risk of flooding. These are indirect references to maintaining water quality. Water availability has become an issue more recently with the prolonged period of low rainfall in the spring of 2011 and implications for the agricultural industry. Coastal waters are generally quite good with some beaches in the District having Blue flag awards as good bathing beaches.

SA 11 to conserve soil resources and quality (+3.5) is mainly achieved through the use of previously developed land and this is clearly set out as a priority and guiding principle in SP1. However, there are strong negatives for SAs 11 and 12 in SP20 the Area East of Ipswich, as the preferred option has been determined as being to utilise land abutting Adastral Park and close to the Deben estuary, an area thought to be less environmentally sustainable for this

degree of development (and borne out through separate strategic site assessment). So although the score for SA 11 is low, conserving soil resources particularly through the re use of land is firmly integrated in the plan.

SP 12 Climate change requires the use of recycled materials where appropriate and this has been the trigger for the strongly significant scoring on SA 12 to use water and minerals efficiently and reuse and recycle. DM policy 23 as we will see later promotes water conservation measures such as grey water recycling and efficiency devices plus encourages installation of permeable soakaways.

SA 13 to reduce waste and SA 15 to reduce emissions of greenhouse gases from energy consumption receive the lowest scores (-10 and -7 respectively). These objectives score negatively because the development of new housing and employment uses will generate waste – it will be new and additional to existing waste production. However, SP12 Climate change contains a statement that makes it clear that the authority will ensure all development helps to reduce waste and pollution. More guidance as to how this might be done is included in DM 23 Sustainable construction where reference is made to biomass technology and DM 20 which encourages conservation of energy and use of alternative sources of energy.

SA 14 to reduce the effects of traffic on the environment (-1.5) comes up as a concern in 13 policies but maintains its overall sustainability. Inevitably, the problem is that traffic will be generated by new development and will increase the volume. This does not always have to be an environmental concern as in some locations it will be insignificant or it can be managed so it does not contribute to air quality issues. SP11 Accessibility scores positively due to its aims to move local car journeys to more sustainable forms of travel and transfer freight from road to rail. However, SP10 The A14 and the A12 scores a strong negative on this objective as the policy includes reference to possible new routes and improvements which may increase capacity and subsequently encourage more usage of these routes. Several policies refer to the need to take the impact of traffic generation into account in decision making, including proposals for new development being well related to the road network. SP1 Sustainable development states that it will seek to reduce the overall need to travel.

SA 16 reduce vulnerability to flooding (+5) improved its sustainability by 1.5 points in the June 2010 iteration of the appraisal, with additional positive impacts from SP2 Housing numbers and SP17 Green space due to development requiring sustainable features such that the impact of flooding will be mitigated (through building technologies) or the likelihood of flooding will be reduced (through permeable surfaces around developments reducing the extent of urban surface runoff). Significantly, the objective also scores strong positives in policies SP12 Climate change, SP22 Aldeburgh and SP30 the Coastal Zone ensuring that flooding issues will be considered and hence vulnerability to flooding should be managed as a result of the implementation of the plan.

SA 17 to conserve and enhance biodiversity and geodiversity achieves a positive score, despite becoming slightly less sustainable in the final version of the plan due to incorporation of the results of the Appropriate Assessment. There is also a concern that SP21 Felixstowe, scores slightly negatively because a priority of improved access to green space and countryside could have a detrimental effect on biodiversity. Otherwise the plan has several strengths in this objective, particularly SP14 Biodiversity and geodiversity and SP28 Other villages, which both score a strong positives and offset a number of slight negatives recorded in the spatial strategy policies.

SA 18 to conserve and where appropriate enhance areas of historical and archaeological interest (3.5) is still one of the few SA objectives that does not have a core strategy policy that champions it, (i.e. no policy records a strongly positive impact.) Such aspects may be covered by references to conserve and enhance the built environment (SP1) and revenue from

tourism may contribute to the upkeep of historical and archaeological sites. However this is weak and does not recognise the value of the archaeological asset that is in Suffolk Coastal District.

In total, four SA objectives relating to the environment score negatively overall. In each case consideration needs to be given to whether this is actually the case or if there is in fact one or more policies that are focused on the issue to ensure that it is taken into account in determining all planning applications.

All the social objectives (SA1 to 8) are likely to be enhanced by the implementation of the core strategy policies, in particular meeting the housing needs of the area as a whole, assisting access to services and reducing poverty and social exclusion. Indeed, throughout the eight social objectives there are only five negative scores, three of which are slight and none of which are considered significant.

#### Cumulative/secondary effects

Cumulative/secondary effects have been considered for each policy and are summarised in the sheets included in Appendix 3. Secondary effects of recreational demand generated from proposed housing development in Ipswich and Suffolk Coastal could be significant for popular destinations on the Deben estuary such as Waldringfield. Such effects could be traffic and congestion, reducing the quality of life for local residents, more dog walkers that could disturb birds on the estuary or additional pressure for sailing facilities, ownership of boats used on the Deben estuary.

The only other negative secondary effects identified in the appraisal are linked to 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.

Table 6.3: Appraisal results of the 30 Core 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	25	26	27	28	29	30	T	
1. To improve the health of the population overall		+									+		-			++	+	+	+	+	+						+				10	
2. To maintain and improve levels of education and skills in the population overall																			0/-			+	+								7.5	
3. To reduce crime and anti-social activity				+		+						+				+															5	
4. To reduce poverty and social exclusion	++	+	++	+	+	+	++	+			+	++					+	+		+	+				+	++					23	
5. To improve access to key services for all sectors of the population	++	++				+			+		++						++	++	++	+	++	++	++	++	+	+	++	+			26	
6. To offer everybody the opportunity for rewarding and satisfying employment	+	+	+		++	+	++	+	+		+	++	++	+	+/0				+	+	0	+	+	+	++	++	+	+			24.5	
7. To meet the housing requirements of the whole community	+	++	++	+	0/-							++	++						++	++	+	+	+	+	+	+	++	+			22.5	
8. To improve the quality of where people live and to encourage community participation	+	+	+	+	+	+	+	0/-	+	+	0/+	+	+	+	+	++	++	+	+	+	+	0	+	+	+	+	+		0/+		19.5	
9. To maintain and where possible improve air quality	+	-	-		0/-	-	-	0/-	0/-	-	+	++	++	++			+	+	++	-	-	-	-	-	-	-	-				-2	
10. To maintain and where possible improve water quality	+	+			-			0				++	+/	++				+		0/-				0/-	0/-	0/-					4	
11. To conserve soil resources and quality	++	-	+		-		0/-	0/-				+	-	+			0/+		-	+	+	+	+		-			+			3.5	
12. To use water and mineral resources efficiently, and re-use and recycle where possible	++											++	+																		3	
13. To reduce waste		-	-		0/-		0/-	-			++	++	--								0/-	0/-	0/-	0/-	0/-	0/-	0/-					-10
14. To reduce the effects of traffic on the environment	++	-	-		0/-	-	0/+	0/-		--	+		+			+			+		0/-	0/-	0/-	0/-	0/-	0/-	0/-					-1.5
15. To reduce emissions of greenhouse gasses from energy consumption	+	-	-		0/-	-		0/-	0/-	-	+	++	++								0/-	0/-	0/-	0/-	0/-	0/-	0/-	+				-7
16. To reduce vulnerability to flooding	+	+	-		+/			0/-	0/-	?		++	+				+			-	+	++	0/-	0/-	0/-	0/-	0/-	+				5
17. To conserve and enhance biodiversity and geodiversity	++	-	0/-	+			0/+	+		-		+	+	++	+		+		-	0/-	0/-	0/-	0/-	0/-	0/-	0/-	+	++	+		6.5	
18. To conserve and where appropriate enhance areas of historical and archaeological importance	+	-	0/-					+							++					-	+											3.5
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	++	+				-	0/-	++		+		+	+	++	++		+		+		++	++	++	++	++	+	0	++	+		27.5	
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	++	+			++	++	++	++	+	+		+	++	+	+/				+		0/+	+	+	+	+	+	+	+				26.5
21. To revitalise town centres	+				+	++			+										+		+	+	+	+	+	+	+				9	
22. To encourage efficient patterns of movement in support of economic growth	++	++				++		+		+		+	+			+		+		+	+	+	+	+	+	+	+				18	
23. To encourage and accommodate both indigenous and inward investment	+				+	+	+	+	+	+	+	+	+	+						+	+	+	+	+	+	+	++				15	
TOTAL	29	8	-1	5	3.5	8	5.5	6	3	1	10.5	15	15	10	7.5	8	9.5	13	10.5	0	14.5	8.5	7.5	4.5	0.5	8.5	7.5	12	1	6.5	237	

Blanks in the above table means that no negative or positive impact was thought likely and no mitigation is therefore required



## 6.7 Mitigation

Due to the way the policies will be applied in tandem the sustainability appraisal suggests there are few aspects that require mitigation.

Water Quality: The core strategy policies contain no direct reference to maintaining or improving water quality. It is thought that the plan will have a marginally positive impact on water quality because it seeks to minimise the risk of pollution and of flooding. This does not specifically protect the water table and water resources. Very recent weather patterns have highlighted the implications of rainfall shortages for the agricultural economy and environmental designations. Linked to this is the efficient use of water, including reuse and recycling. Specific water conservation measures are included in a development management policy but it would be helpful to back this up with strategic guidance requiring the consideration of water quality and use of resources. There is also the concern that housing and employment growth can put pressure on sewage and drainage systems that are already at or approaching capacity, risking damage to the environment. However such concerns can be overcome by investment before new development takes place (as highlighted in SP1) and hence it is assumed in this appraisal that these issues can be overcome in a timely manner and are not a threat to the environment.

### Air Quality

Maintaining and improving air quality is not specifically referred to in the plan policies but it will be achieved to some extent if the overall need for travel is reduced and is interpreted as an aspect of pollution as mentioned in the Climate change policy (SP12). A Strategic Planning Guidance (SPG) document on Air Quality is currently being prepared jointly by all Suffolk Districts and the County Council with the intention that each authority adopts it as SPG. There are other air quality hot spots in Suffolk Coastal so an awareness of the possibility of air quality issues is needed when determining planning applications.

### Historical and archaeological interest

SP1 Sustainable development refers to conserving and enhancing the built environment and maintaining a sense of place. This could be interpreted to protect Listed Buildings and archaeological sites. However there is nothing in any of the core strategy policies that recognises the value of the archaeological asset and seeks to protect and enhance it. Suffolk Coastal has a rich Bronze Age and Anglo-Saxon heritage that in the case of Sutton Hoo, has been developed as a tourist attraction making an important contribution to the cultural offer, rural employment and tourist spend in the District. Coastal erosion or regular flooding associated with climate change could raise the need for future rescue archaeology.

The following mitigation proposals incorporate those remaining from previous iterations of the SA and are still considered relevant and those stemming from consideration of the cumulative effects of this plan with that of Ipswich Borough:

- Clarify in SP1 that Suffolk Coastal's archaeological asset will be protected and enhanced. Also consider SPG 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.
- 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.
- 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. (Previously M5 in July 2009)

- Woodbridge. Do not use “Gateway” label in a way that will channel traffic through the town, thereby exacerbating existing AQMA issues. (Previously M6 in July 2009)
- 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 ensure that no development is within 1km of a designated area (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.
- 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 need for mitigation in the form of provision of a country park (or similar high quality provision) in the north Ipswich area. Creation of a country park at the Foxhall Tip site could occur in the longer term, but careful timing of large scale housing development is required to ensure damage to designated sites does not occur before it is available. Hence it will be important that in the Martlesham Area Action Plan open space is provided as part of the Adastral Park 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, the proposed Foxhall Country Park (or similar high quality provision) 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).
- 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.

### 6.8 How problems were considered in developing policies and proposals

Many issues raised in previous drafts of the core strategy policies have been considered in the later versions of policies. Tables 6.4, 6.5, 6.6 and 6.7 show mitigation proposed at previous stages of the appraisal which have since been successfully integrated into the plan.

Table 6.4 Mitigation following June 2010 and November 2010 SA

	Description of mitigation	Action
<b>M1</b>	Clarify in SP1 that Suffolk Coastal’s archaeological asset will be protected and enhanced. Also consider SPG 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	Historic buildings are referred to in the supporting text.

	landscaping of buildings.	
M2	SP2 housing distribution. In terms of sustainability it may be better for 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.	No change
M3	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. (Previously M5 in July 2009)	No change
M4	Woodbridge. Do not use "Gateway" label in a way that will channel traffic through the town, thereby exacerbating existing AQMA issues. (Previously M6 in July 2009)	No change
M5	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. A site specific appropriate assessment will also be required.	Noted
M6	SP15 Landscape and townscape should highlight the importance of designated Conservation Areas in the district.	Already covered in the supporting text.
M7	SP17 Green space includes a new priority to provide green infrastructure to complement strategic housing growth. While this results in positive sustainability outcomes for social and health indicators, the policy should clarify that enhancement to biodiversity should be sought where planning and creating green space.	Already a statutory requirement so no need to repeat.
	Further consideration needs to be given to how the objective of achieving urban cooling mentioned in Objective 14 Green Infrastructure is achieved in the plan.	No change
Nov	SP 1 remove "best of the areas"	Policy changed

Table 6.5 Mitigation following July 2009 sustainability appraisal

Description of mitigation	Action
<b>M1:</b> Clarify in SP1 that Suffolk Coastal's archaeological asset will be protected and enhanced. Also consider SPG 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.	No action taken
Other points requiring mitigation mentioned in section 6.4 above are:	
<b>M2:</b> SP2 housing distribution. In terms of sustainability it may be better for 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.	No action taken.
<b>M3:</b> SP19 Settlement policy should be cross referenced to other policies that set out the scale of development considered appropriate to each level in the settlement hierarchy.	Refers to other SPs (SP20 Area East of Ipswich and SP29 The Countryside) and provides summary of settlement hierarchy within supporting text.

<b>M4:</b> SP20 Area east of Ipswich appropriate assessment of future developments proposed near the Deben SPA will be required.	Still applies
<b>M5:</b> SP25 Saxmundham. Consideration needs to be given to improved sustainable transport links between Leiston and Saxmundham.	No new reference
<b>M6:</b> SP26 Woodbridge. Do not use “Gateway” label in a way that will channel traffic through the town, thereby exacerbating AQMA issues.	No action taken

*Table 6.6 Mitigation following June 2009 sustainability appraisal*

	<b>Description of mitigation</b>	<b>Action</b>
<b>M1</b>	Add reference to conserving and enhancing water quality and resources (including recycling) to SP1 Sustainable development and/or	Water recycling added to SP1
<b>M2</b>	Monitor the quality and availability of water resources from water catchment areas in the District and the quality of rivers.	Water supply and sewage highlighted in Implementation and monitoring section.
<b>M3</b>	Include reference to the need to maintain and enhance air quality in SP1 and include reference to adopting SPG on Air Quality.	Indirectly covered in SP1 (h) conserve and enhance the natural and built environment; also in SP14 residential amenity and SP15 green house gases
<b>M4</b>	Include reference to maintaining and improving air quality in SP9 Woodbridge as there is a designated Air Quality Management Area in its vicinity and decisions concerning future housing and employment developments could have an impact.	Reference to the Air Quality management area is included in the supporting text.
<b>M5</b>	Clarify in SP1 that Suffolk Coastal’s archaeological asset will be protected and enhanced. Also consider SPG 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.	Historic buildings are referred to in the supporting text.
<b>M6</b>	Consider a policy response to assist the achievement of the Shoreline Management Plan, particularly on loss of land, homes, community facilities, infrastructure and heritage assets as a result of coastal erosion. This could include an exceptions policy for replacement facilities.	Included in the redrafted SP30 The Coastal zone
<b>M7</b>	Add consideration of flood and coastal erosion issues to SP10 A12 and A14 (as these could lead to requirements to raise the road within the AONB or other flood defence activities).	Supporting text to SP10 seeks continual enhancement and improvement of all routes.
<b>M8</b>	SCDC need to assure themselves that their Housing Survey is robust to the need for very sheltered accommodation for an ageing 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	Number and type of affordable housing built is to be monitored.

should be monitored.

Table 6.7. Mitigation following October 2008 sustainability appraisal

CS Objective	Suggested changes	Actions
1	<b>Sustainable Development</b> Wording should be changed to included “ <i>To deliver better integrated and sustainable patterns of land use....</i> ” This is because this is better than the current wording “ <i>more</i> ” as it implies to improve on what currently exists and also to aim for better provision.	Done. See Objective 1 Sustainability
2	<b>Settlement Policy</b> Seeks changes so that PDL emphasis is ‘maximised’. Greater emphasis on maximising the use of PDL land should be explicit throughout the points on housing, employment, retail development etc.	Done. Adequately included in SP1
3	<b>Countryside</b> This objective seemed to be removed from the current CS and will need further work as well as the revision ideas for promote a stronger green agenda in SCDC.	Done. See objective 10 and Objective 15
CS Policy	Suggested changes	Actions
1	<b>Sustainable development</b> The RSS policy option scored higher! The CS policy could be strengthened with a greater focus on reducing poverty and social exclusion, opportunities for employment, water + soil quality, bio/geo diversity and achieving economic growth.	Done. See SP1
2	<b>Settlement policy</b> The existing policy appeared the score well. However, the alternative option of perhaps having an additional ‘layer’ in the hierarchy for settlements such as Wickham Market and Trimleys may be better as they are well served by public transport and development here would also lighten traffic impact upon the major centre areas.	Wickham Market and Trimleys are recognised as Key Service Centres.
3	<b>Development in the countryside</b> Need to consider the ability to meet local social and health needs, including local leisure facilities for communities in the countryside.	Done. See SP11
4	<b>New housing</b> Main impacts from SA were identified as commuting and travel to work impacts. In addition it picked up impact upon AONB etc in Felixstowe. Needs to be revisited in light of LDF TG.	Considered in Strategic housing site assessment.
5	<b>Affordable housing</b> Target 24% whereas regional target is 35%. Housing survey needs to be robust to ageing population needs.	Target remains at 24% regarded as adequate to meet local needs.
6	<b>Economic development</b> Generally came out with a minor positive score. However, there were some possible issues with the impact of the hierarchy on restricting economic development in rural areas which may in turn limit potential of the rural economy	Done. See SP24
7	<b>New Jobs</b> Was identified with a minor negative score mainly due to the inevitable pressures on waste, traffic, energy use attributed with development. There were however concerns over the potential impacts on archaeological and wildlife areas resulting from a strategic employment allocation at Ransomes Europark.	SP21 Jobs seeks to protect existing employment sites
8	<b>Rural Economy</b> No major issues identified – preferred policy was favoured over alternatives.	
9	<b>Tourism</b> The policy would benefit from having an input to the wording to	Done See SP25

	include a reference to also assessing proposals against their environmental impact.	
10	<b>Retail floorspace</b> No major issues identified.	
11	<b>Retail hierarchy</b> No major issues identified.	
12	<b>Travel</b> No major issues identified.	
13	<b>Connectivity</b> The policy could be improved, recognising need for public transport links to Stansted, value of ferry services and rail to London.	<b>Done. SP29 is more specific</b>
14	<b>Biodiversity</b> The end of the policy should be strengthened to read " <i>Improved site management and controlled public access to these sites will be encouraged where appropriate</i> ".	<b>Statement dropped from SP31 but as suggested in DC32.</b>
15	<b>Reduce Greenhouse Gas Emissions</b> No major issues identified.	
16	<b>Design</b> No major issues identified.	
17	<b>Construction</b> No major issues identified.	
18	<b>Renewable Energy</b> No major issues identified.	
19	<b>Nuclear Power</b> Noted need to monitor health concerns by reporting annual radioactivity levels.	<b>Included in monitoring framework</b>
20	<b>Environmental Risk</b> Strengthen to clarify development will not be permitted in areas of flood risk.	
21	<b>Infrastructure</b> No major issues identified.	
22	<b>Local Services</b> No major issues identified.	
23	<b>Leisure</b> No major issues identified.	

## 6.9 Uncertainties and risks

Some impacts have been identified which could be either positive or negative depending on how and where the policies are implemented. There is uncertainty as to when a country park could be delivered at Foxhall tip. Changes in commercial operations due to increased recycling and the landfill tax may change when this site is restored. Currently it is envisaged this will be by 2021. It is understood that the Appropriate Assessment and Natural England regard additional strategic greenspace provision as necessary to mitigate the cumulative effects of housing development in Ipswich and Suffolk Coastal in addition to a country park proposed in the north Ipswich area.

## 6.10 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.

Another observation is that SP1 Sustainable development includes the wording "to mitigate against and adapt to the effects of climate change". The word "adapt" needs to follow through to SP12 Climate change. An explanation of the process of adapting to climate change should also be included in the supporting text for SP1.

Another observation is that the concept of urban cooling highlighted in Objective 14 Green infrastructure is not followed through into policies. Changes to policy wording may not be necessary but mention in the supporting text to the following policies SP17 Green space, SP18 Infrastructure; SP15 Climate change, DM22 Design function and DM24 Sustainable construction, could help demonstrate the role they can play in achieving urban cooling. It is noted that a definition of urban cooling has been included in objective 14, but the above amendments would still be helpful.

## 6.11 Implementation and monitoring

Link to other tiers of plans and programmes

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

Proposals for monitoring

Table 6.8 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 1 sets out the long list of SA indicators with the full definitions that ideally need to be monitored but Table 6.8 focuses on the key concerns, including those raised in the SA itself.

*Table 6.8: 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. 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
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 and catchment areas using Water Framework Directive classification.
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. Proportion of CO2 emissions from domestic, industrial and transport sources now available.
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.
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. Numbers of visitors to Natura 2000 sites included in the monitoring plan associated with new housing development.
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 advice services from within/outside area. Business start ups and closures. Employment land availability. Employment permissions and allocations.

## **SECTION D**

# **DEVELOPMENT MANAGEMENT POLICIES**

## 7. Appraisal of development management policies

### 7.1 Statutory purpose

In formal terms the Development Management Policies Development Plan Document is intended to fulfil the requirements of the Local Development Framework production process ( i.e. the Regulation 26 stage under the Town and Country Planning Act (Local Development ) (England) regulations 2004.

### 7.2 Links with national policy & other plans

The Development Management DPD had to be prepared in the context of nation's policy documents, specifically the Planning Policy Guidance Notes (PPGs) and Planning Policy Statements (PPSs), Government White Papers and planning circulars. It is not necessary to repeat national policy in the plan but it often needs to be interpreted in a local context or mentioned in the support text to assist the use of the document by potential developers.

### 7.3 Development Management policies

The purpose of the suite of Development Management Policies is to ensure that all new development accords with the Council's Vision and Objectives as set out in the core strategy. There are a total of 33 covering Housing, employment, transport, environment and community well-being.

The Development Management policies have been appraised for their level of sustainability and the results are set out in Appendix 3. This is the third sustainability appraisal they have been subjected to. Nothing has needed to be changed as a result of the baseline data update in June 2011 so the following results are exactly as set out in the June 2010 appraisal. Options were considered in the first appraisal. The appraisal compares policies that have changed with their original assessment in July 2009. Table 7.1 below summarises the actions taken as a result of the July 2009 appraisal of development management policies and if they are reflected in the set of policies currently being assessed.

*Table 7.1 Mitigation following earlier sustainability appraisals*

<b>Description of mitigation</b>	<b>Action</b>
<b>M7:</b> Clarify in DM5 Houses in multiple occupation that it refers to urban areas or requires such buildings to be located close to a good range of services so it will have greater impact on encouraging sustainable transport use. (Outstanding from October 2008)	No action taken
<b>M8:</b> The need to design space for the storage of recyclable and non-recyclable waste including composting should be added to DM22 Design – Function as this would assist in achieving waste minimisation and recycling and is not picked up elsewhere. (Outstanding from October 2008)	No action taken

### 7.4 Development management appraisal results

The aim of this appraisal is to set out the main sustainability implications of each policy and to consider if together with the core strategy policies will ensure sustainable development in Suffolk Coastal District.

The policies were assessed against the 23 SA objectives listed in Section B Table 5.1 using the scoring system in Table 7.2. For each SA objective the impact on the indicators associated with them (see Appendix 1 Sustainability framework) were considered and possible direction of impact recorded.

Table 7.2: SA scoring system

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

Options that were considered are set out in Appendix 6 although in some cases policies have changed so they can be regarded as a further option to previous ones assessed. Table 7.3 is included to assist comparison with the July 2009 sustainability appraisal.

Table 7.3 Comparison with July 2009 appraisal

Policy Numbering in Cabinet document	SA Score	Policy Title	Old SA Score	Difference
DM1	6.5	Affordable Housing on Exception Sites	6.5	0
DM2	6	Affordable Housing on Residential Sites	6	0
DM3	7	Housing in the Countryside	7	0
DM4	4	Housing Clusters in the Countryside	4	0
DM5	5	Conversions and Houses in Multiple Occupation	5	0
DM6	6.5	Residential Annexes	6.5	0
DM7	0	Infilling & Backland Development within Settlement Envelopes	0	0
DM8	2.5	Extensions to Residential Curtilages	2.5	0
DM9	5.5	Gypsies, Travellers & Travelling Showpersons	5.5	0
DM10	6	Protection of Employment Sites	6	0
DM11	-1	Warehousing and Storage	-1	0
DM12	10.5	Expansion and Intensification of employment sites	10.5	0
DM13	6.5	Conversion and re-use of redundant buildings in the countryside	6.5	0
DM14	3	Farm diversification	3	0
DM15	4.5	Agricultural buildings and structures	4.5	0
DM16	7.5	Farm shops	7.5	0
DM17	2	Touring caravan , camper vans and camping sites	2	0
DM18	-1	Static Holiday caravans , cabins and Chalets	-1	0
DM19	1	Parking Standards	1	0
DM20	10	Travel Plans	10	0
DM21	12	Design: Aesthetics	12	0
DM22	10.5	Design: Function	10.5	0
DM23	3	Residential Amenity	3	0
DM24	4.5	Sustainable Construction	4.5	0
DM25	2.5	Art	2.5	0

DM26	1	Lighting	1	0
DM27	6.5	Biodiversity and Geodiversity	6	0.5
DM28	2	Flood Risk	2	0
DM29	12	Telecommunications	12	0
DM30	7	Key Facilities	7	0
DM31	3.5	Public Buildings	3.5	0
DM32	5	Sport and Play	5	0
DM33	3.5	Allotments	3.5	0

Table 7.3 above shows the changes in SA scoring of Development Management policies from the previous policy wording (appraised in July 2009) to this version. Overall there has been very little change in the sustainability of the Development Management policies, with 32 out of the 33 policies receiving the same overall SA score. The single policy that has changed has seen improved sustainability, DM 27 Biodiversity and geodiversity, improved by 0.5 points. Overall therefore, the set of Development Management policies has improved in sustainability by +0.5 points.

The following summarises the sustainability issues raised for each development management policy. For details of why scoring is in particular directions see Appendix 3.

#### **DM1 – Affordable Housing on Exception Sites**

This is a sustainable policy which scores very strongly on social and, to a lesser extent, economic sustainability appraisal objectives, achieving +6.5 in total. The fact that the policy is allowing some development, albeit small, inevitably means that it will score slight negatives on a number of environmental objectives. However, these are mitigated against by strategic policies, particularly SP12 Climate change and SP14 Biodiversity and geodiversity.

#### **DM2 – Affordable Housing on Residential Sites**

This policy aims to allow small affordable housing allocations in major centres and towns or key and local service centres, scaled according to the criteria of the settlement hierarchy. The policy scores some weak negatives on environmental objectives aside from a positive for SA 14 reducing the effects of traffic as these allocations are likely to be within walking or cycling distance from key services. It scores strong positives for social objectives, particularly SA 4 reducing poverty and social exclusion and SA 7 meeting housing requirements. Economic impacts are also positive. As a whole the policy scores +6.

#### **DM3 – Housing in the Countryside**

This policy sets out strict criteria controlling and limiting new housing in the countryside. As such, it does not score any negative impacts on environmental objectives; or any other objectives for that matter, with a strong total score of +7 as a result. It also scores a number of single positives in social objectives and a single plus for SA 22 encouraging efficient patterns of economic growth.

#### **DM4 – Housing in Clusters in the Countryside**

DM4 outlines criteria by which new dwellings within 'clusters' in the countryside will be acceptable. It affords particular care to the character and appearance of the cluster as well as the sensitive nature of conservation areas and the Area of Outstanding Natural Beauty. This results in strong positives for SAs 18 and 19 conserving and enhancing areas of historical and archaeological importance and the quality and local distinctiveness of landscapes and towns. However, the policy does score some negatives on environmental criteria as a result of permitting development within the countryside. It scores slight positives on social and economic objectives and has a total score of +4.

#### **DM5 – Conversions and Houses in Multiple Occupation**

In general this is a sustainable policy, scoring +5 due to a number of positive impacts on social, environmental and economic SA objectives. It does score negatively on SA 13 to reduce waste and

SA 15 to reduce emissions of greenhouse gases from energy consumption, but as discussed previously, these are covered by strong positive policies elsewhere in the plan.

#### **DM6 – Residential Annexes**

This is generally sustainable policy, likely to bring about strong positive impacts on SA 7 housing requirements and SA 19 landscapes and townscapes. It records only one slight negative for SA 17 biodiversity and geodiversity as building residential annexes could take established gardens rich in biodiversity. It is very strong on social criteria, with a resulting total score of +6.5.

#### **DM7 – Infilling and Backland Development within Settlement Envelopes**

This policy scores a neutral outcome (0). The main area for concern is for environmental SA objectives, particularly due to the development occurring on garden land adjacent to existing dwellings, as well as the typical negative impacts of development. However, the policy scores some positive impacts, mainly for economic criteria. It also scores positively for SA 19 landscape and townscape because the policy assures that any development is within the character of the settlement.

#### **DM8 – Extensions to Residential Curtilages**

This policy considers planning applications for the extension of residential curtilages into the countryside. The policy outlines a strong range of criteria by which these developments will be permitted, resulting in no negative impacts being identified. The policy scores positively on SAs 8 improving the quality of where people live and encouraging community participation, 17 conserving and enhancing bio and geodiversity and 19 landscapes and townscapes, resulting in an overall positive outcome (+2.5).

#### **DM9 – Gypsies, Travellers and Travelling Show Persons**

In general this is a sustainable policy, particularly with regard to social SA objectives, for which it scores +5 alone. The policy offers a detailed set of criteria by which the housing needs of gypsies and travellers will be met, but scores some slight negatives on environmental objectives including SA 13 reducing waste and 14 reducing the effects of traffic on the environment. No impacts are identified for economic objectives.

#### **DM10 – Protection of employment sites**

This policy achieves a strong positive score (+6), as it meets criteria for positive impacts on a number of social and economic objectives. However, it does score negatively overall on environmental objectives, with SA 18 conserving and enhancing areas of historical and archaeological importance and SA 19 landscapes and townscapes being particularly negatively impacted. Other policies in the plan should mitigate any potential detrimental effects, in this case SP 15 landscapes and townscapes will be a particularly important policy.

#### **DM11 – Warehousing and Storage**

DM11 Warehousing and storage scores slightly negatively (-1), mainly due to the generation of traffic and no consideration of the implications of flood risk. This seems to be making an exception for local distribution purposes and what exactly this means will need to be explored in the supporting text. If it is small scale then the scale of impact could be minor. Generally then, the policy falls down on environmental objectives, but impacts positively on economic criteria.

#### **DM12 – Expansion and Intensification of Employment Sites**

DM 12 Expansion and intensification of employment sites (+10.5) is among the most positively scoring policies, as it is sensitive to the impact on residents and also scores well on the environmental and economic SA objectives.

#### **DM13 – Conversion and Re-use of Redundant Buildings in the Countryside**

This policy scores positively overall on all three categories of SA objectives; social, environmental and economic as it is a thorough suite of criteria controlling development, giving regard to aspects

of all of these SA objective categories and ending with a total score of +6.5. It is particularly strong for social criteria, especially SA 7 meeting the housing requirements of the whole community, for which it receives a strong positive.

#### **DM14 – Farm Diversification**

Overall this is a slightly positive scoring policy (+3). Social and economic objectives are positively impacted, but there are slight concerns over environmental impacts as the policy may cause detrimental impacts on biodiversity (SA 17) and waste (SA 13).

#### **DM15 – Agricultural Buildings and Structures**

In general this is a sustainable policy (+4.5), particularly on economic objectives. It receives a mixture of scores on environmental objectives, being neutral overall in this area and being particularly positive on SA 19 landscape and townscape as it contains specific reference to avoiding visual intrusion on the AONB and Special Landscape Areas.

#### **DM16 – Farm Shops**

This is a sustainable policy, with only one negative impact identified; for SA 13 waste, which should be mitigated by the implementation of SP 12 Climate change. Aside from this, it achieves single positive scores on a number of social, environmental and economic objectives to achieve an overall positive score of +7.5.

#### **DM17 – Touring Caravan, Camper Vans and Camping Sites**

This policy is appraised as having a slightly positive overall impact (+2). It achieves a strong positive in SA 19 landscape and townscape for preventing new touring caravan, camper vans and camping sites within the Heritage Coast, adjoining estuaries, within exposed parts of the AONB or where they have a materially adverse impact on the landscape. Otherwise, it causes slight impacts (both positive and negative) on a number of (mainly environmental) objectives, but contains no major concentrated areas of concern.

#### **DM18 – Static Holiday Caravans, Cabins and Chalets**

DM18 Static Holiday caravans, cabins and chalets is the other lowest scoring policy, scoring marginally negatively because of the increase in waste, and possible impact on flood risk (SA 16) and loss of biodiversity and geodiversity (SA 17). However these are mitigated by SP12 for waste and by core strategy and development control policies for flood risk and loss of biodiversity and geodiversity.

#### **DM19 – Parking Standards**

Overall this is a very slightly positive scoring policy (+1). The main area for concern are the environmental objectives, where the policy scores -3.5 in total due to the potential encouragement of traffic (SA 14) and related impacts on air quality (SA 9) and greenhouse gas emissions (SA 15). In contrast, it scores well on social objectives (+3) as it is considered likely to improve access to services (SA 4), improve health (SA 1) and the general quality of where people live (SA 8). Economic impacts are also positive, encouraging efficient patterns of economic growth (SA 22) through car park provision being related to public transport, as well as revitalising town centres (SA 21).

#### **DM20 – Travel Plans**

DM20 Travel Plans (+10) is a valuable statement promoting sustainable transport and reducing the use of cars, scoring very strongly on reducing the effects of traffic and air quality and being positive overall on all three SA objective categories.

#### **DM21 – Design: Aesthetics**

DM 21 had no associated negative impacts and is a comprehensive policy dealing with the design of development, scoring particularly positively on the environmental criteria (+8) as it contains reference to protecting existing site features of landscape, ecological or amenity value and enhancing habitat creation. It is the highest scoring policy overall with +12, and has five strong

positive impacts on SA 8 quality of where people live, SA15 greenhouse gas emissions, SA 17 biodiversity and geodiversity, SA 18 historical and archaeological areas and SA 19 landscapes and townscapes.

#### **DM22 – Design: Function**

DM22 Design function (+10.5) scores very well on water quality and recycling water because it contains a sentence stating that the Council will strongly encourage water conservation measures such as grey water systems, permeable soakaways and water efficiency devices. This now complements the core strategy policy SP12.

#### **DM23 – Residential Amenity**

This is a sustainable policy which impacts positively on three objectives as it considers the social aspects of new development (positive scores on SA 3 crime and antisocial activity and SA 8 quality of where people live and community participation, and impact on air quality (SA 9). It includes consideration of outlook which is often regarded as an important local factor for those moving to a place and those that might lose amenity through new development.

#### **DM24 – Sustainable Construction**

Overall this is a sustainable policy, scoring particularly well for environmental objectives, with a strong positive for SA 12 efficient use of water and mineral resources due to the sustainable construction criteria set out. The policy could be more sustainable if all developments more than 10 dwellings had to comply with level 4 and if higher standards were phased in over time. This would improve SCDC contribution of reducing carbon emissions by 60% by 2025 (Suffolk Community Strategy target).

#### **DM25 – Art**

This policy has little sustainability impact, with only a single positive and three weak positive effects being identified, spread across social and environmental objectives.

#### **DM26 - Lighting**

This is a slightly positive policy (+2), with most of the positive impacts being identified in social objectives. It scores positively on SA 1 health and SA 3 crime and anti-social activity as the lighting will allow extended use of recreational land in the dark and will discourage crime and anti-social activity. Two negative impacts are identified in environmental objectives as the extra lighting will inevitably make a small contribution to increased greenhouse gas emissions, although the policy has adopted the utilisation of energy efficient bulbs to minimise this negative. The lighting may also have a detrimental impact on biodiversity.

#### **DM27 – Biodiversity and geodiversity**

The policy is marginally more sustainable than the version previously assessed as it achieves a weak positive due to increasing public access to green space which may encourage people to take more exercise and thereby improve their health, achieving a total score of +6.5. This wording is not new but slightly improves the sustainability of what is now a more strongly worded policy. This is a strongly sustainable policy, particularly with regard to environmental SA objectives, with no negative impacts identified. However, increased and sustained public access to green space may have a detrimental impact on biodiversity and is a potential long term impact.

#### **DM28 – Flood Risk**

DM 28 focuses on the sequential test for allowing residential development in areas of flood risk. It scores positively overall as by seeking to restrict development in areas of high flood risk it ensures that the risk to existing properties is not worsened through additional run off.

#### **DM29 – Telecommunications**

DM 29 telecommunication is the strongest scoring of this set of development management policies, scoring +12 overall. Only a single negative impact is identified, as proposals for telecommunications apparatus and related development may adversely impact upon biodiversity (SA 17) and permission may be given for development in the AONB, SSSIs, Conservation Areas, Special Landscape Areas,



and Historic Parklands or within the setting of listed buildings if there is an essential need and no alternative sites in less sensitive locations can be found. Three strong positive impacts are identified in environmental objective as the policy generally takes care over the criteria by which the proposals may be permitted, paying particular attention to location and landscaping requirements and the design minimising the impact of development on its surroundings.

### **DM30 – Key Facilities**

This is a wholly sustainable policy for which no negative impacts are identified, scoring +7 overall. It scores strong positives for improving access to key services (SA 5) and improving the quality of where people live (SA 8) as it aims to redevelop or change key facilities where it will benefit the community. The policy also scores positively for environmental objectives as it will preserve local distinctiveness of townscapes (SA 19).

### **DM31 – Public Buildings**

Generally this is a positive sustainable policy (+3.5), with only a single weak negative identified as it may limit residential uses. Aside from this, the policy is likely to cause a number of positive impacts, particularly in social and environmental objectives, due to its support of prioritising recreational or community uses for any newly redundant or available public buildings.

### **DM32 – Sport and Play**

DM32 scores particularly strongly on social objectives, with two strong positives identified for SA 1 health and SA 9 improving the quality of where people live as the provision of sport and play facilities will be especially beneficial to the community in these areas. Some slight negative environmental impacts are identified, mainly as no consideration is given for biodiversity (SA 17) or waste (SA 13). However, these are offset by some benefits to the environmental suite of objectives, as play facilities will be required to contribute to the character of the area.

### **DM33 – Allotments**

No negative impacts are identified for this policy, and it has a strong positive for improving health (SA 1) as greater provision of allotments encourages people to be more active outdoors. Allotments also improve the overall quality of where people live (SA 8) and may have some benefits for biodiversity (SA 17).

## **7.5 Significant effects**

Table 7.4 summarises the overall results of the appraisal of all the development management policies. Zeros in the table indicate that a neutral result was recorded in the appraisal. This means the application of the policy should not have a noticeable effect on the SA objective. The full results for each policy option can be seen in Appendix 3.

The range in the sustainability scores for the development management policies was less than those for the core strategy policies. However for the SA objectives the scores were far more divergent ranging from +27.5 to -11.5. This reflects the specialist aspects the policies are covering and the need to apply them in the context of other development management policies and the core strategy policies. The highest scoring SA objective was SA 19 to conserve and enhance the quality and local distinctiveness of landscapes and townscapes (+27.5). Seven policies scored very significantly positive perhaps reflecting Suffolk Coastal's response to the comments made in the SA on the initial draft core strategy policies that the AONB seemed to get little protection. SA 18 To conserve and enhance areas of historical and archaeological importance (+13.5) and SA 8 To improve the quality of where people live and to encourage community participation (+18.5) score strongly positive and contribute to this. Although these are the areas of significant effects, on balance the policies are stronger in their social and economic impact. None of the social SA objectives scored negatively nor did the economic SA objectives.

Two of the environmental SA objectives scored negatively overall. SA13 To reduce waste was the worst (-11.5) although all the effects were weakly negative. This highlights that there is not a

development control policy that encourages waste minimisation leaving focus on SP12 Climate change which states it will ensure development helps to reduce waste.

SA15 to reduce greenhouse gas emissions (-5) reflects the problem of all development using energy and records a negative on DM 26 Lighting because it does not advocate the use of low energy lighting where ever possible.

Looking at the overall results shown in Tables 6.4 and 7.4 it can be seen that there are two SA objectives that have a net result that is negative. This illustrates that reduction of waste and energy efficiency are not strong themes of the plan, as they are not repeated in a range of policies however crucially both are promoted in SP12. Air quality is an area that is not specifically addressed in the plan but activities such as providing housing in settlements with a range of facilities (SP19), having regard to residential amenity in the planning of the future development of Sizewell (SP13), minimisation of greenhouse gas emissions in SP12 and recognition that there is currently an AQMA in Woodbridge/Melton (supporting text to SP26) will help minimise air quality impacts.

Appendix 3 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.

The 33 development management policies appraised produced a total of 172 positive impacts (of which 37 were strong positives and 135 were weak positives), 32 negative impacts (of which all were weak negatives). Only 2 policies had a net negative score, and one was neutral (scoring 0).

The only policy to change in the June 2010 appraisal is DM27 Biodiversity and geodiversity, which has become marginally more sustainable.

Table 7.4 Results of the 33 Development Management sustainability appraisal

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	T		
1. To improve the health of the population overall					+	+			+										+	+		0/+					+							++	11.5	
2. To maintain and improve levels of education and skills in the population overall									+																	0/+										1.5
3. To reduce crime and anti-social activity					+																						+									6.5
4. To reduce poverty and social exclusion			++	+	+	+			+																											9.5
5. To improve access to key services for all sectors of the population			+		-				+																											11
6. To offer everybody the opportunity for rewarding and satisfying employment									+			++	+	0/+																						10.5
7. To meet the housing requirements of the whole community			++	+	+	++	+		+				++											0/-				0/+								13.5
8. To improve the quality of where people live and to encourage community participation						+		0/+	+/+		++	0																							18.5	
9. To maintain and where possible improve air quality			0/-	0/-	/+		0/-		0/-		0/-	0	0	0/-	0/-	0	0	0	-	++																1
10. To maintain and where possible improve water quality					0/-		0/-		+			0/-			+													0/+								3
11. To conserve soil resources and quality			0/-	0/-							-				-													+								1
12. To use water and mineral resources efficiently, and re-use and recycle where possible																	0/+																		4.5	
13. To reduce waste			0/-	0/-	-	-	-	-	-								0/-																			-11.5
14. To reduce the effects of traffic on the environment			0/-	0/-	-	/+	-	-			0/-	+	-	+	+	0/+	0	0	-	++																2
15. To reduce emissions of greenhouse gasses from energy consumption			0/-	0/-	-		0/-		0/-		-	0/-	-	0/-	0/-	0	0/-	0/-	-	++																-5
16. To reduce vulnerability to flooding									+		-		-10																							1.5
17. To conserve and enhance biodiversity and geodiversity			0/-	+	0/+	+	0/-	+	+	?		+	+	-	-																					5.5
18. To conserve and where appropriate enhance areas of historical and archaeological importance					++	+			0/-			0/-	++														0/+	+/+							13.5	
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes					++	+	++	+	+			+	+	++	++	+	++	++																	27.5	
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area			+	+			+			+	+	+	+	+	+	+	+	+																		13.5
21. To revitalise town centres																																				2.5
22. To encourage efficient patterns of movement in support of economic growth			+	+	+				+	+	+	+	+	+	+	+	+	+																		14
23. To encourage and accommodate both indigenous and inward investment							+				+	+	+	+	+	+	+																			10.5
<b>TOTAL</b>	<b>6.5</b>	<b>6</b>	<b>7</b>	<b>4</b>	<b>5</b>	<b>6.5</b>	<b>0</b>	<b>2.5</b>	<b>5.5</b>	<b>6</b>	<b>-1</b>	<b>10.5</b>	<b>6.5</b>	<b>3</b>	<b>4.5</b>	<b>7.5</b>	<b>2</b>	<b>-1</b>	<b>1</b>	<b>10</b>	<b>12</b>	<b>10.5</b>	<b>3</b>	<b>4.5</b>	<b>2.5</b>	<b>2</b>	<b>6.5</b>	<b>2</b>	<b>12</b>	<b>7</b>	<b>3.5</b>	<b>5</b>	<b>3.5</b>	<b>166</b>		

Blanks in the above table means that no negative or positive impact was thought likely.

## 7.6 Mitigation

No new mitigation suggestions arose as a result of the June 2010 policy wording. However, mitigation for two policies recommended at the last iteration of the appraisal has not been acted upon and as such the suggestions remain valid:

**M8:** Clarify in DM5 Houses in multiple occupation that it refers to urban areas or requires such buildings to be located close to a good range of services so it will have greater impact on encouraging sustainable transport use. (Previously M7 Outstanding from original appraisal)

**M9:** The need to design space for the storage of recyclable and non-recyclable waste including composting should be added to DM22 Design – Function as this would assist in achieving waste minimisation and recycling and is not picked up elsewhere. (Previously M8 Outstanding from original appraisal)

Table 7.5 shows mitigation proposed at previous stages of the appraisal which has since been successfully integrated into the plan.

*Table 7.5 Mitigation following October 2008 sustainability appraisal*

<b>M11</b>	Clarify that DC13 Warehousing and storage for local distribution purposes will still need to be well related to the primary route network and permeable soakaways considered to deal with runoff. Supporting text needs to comment on what scale of facility is expected linked to local distribution.	Wording of DM11 Warehousing and storage amended. DM22 Design Function supports permeable soakaways.
<b>M12</b>	Clarify if DC23 Airfields is aimed at reuse of redundant airfields and for local leisure use as this would reduce the risk of this policy having a negative impact on sustainability.	Policy DC23 deleted
<b>M13</b>	Consider the need for more policy guidance to be given on waste reduction, minimisation and recycling. There is only one mention of reducing waste in SP15. This gives little practical advice on the sort of aspects that might be sought. SPG could be considered.	DM22 Design function encourages water conservation measures
<b>M14</b>	Add reference to the use of low energy lighting in DC 31 Lighting to encourage energy efficient schemes.	DM26 Lighting amended and energy efficiency included in supporting text.

## 7.6 How problems were considered in developing policies and proposals

Issues raised in the SA of the core strategy policies needed to be considered in the light of those arising from the Development Control policies. Discussion between officers clarified some problems around definition of terms used.

## 7.7 Uncertainties and risks

Some impacts have been identified which could be either positive or negative depending on how and where the policies are implemented.

## 7.8 Other observations

DM10 Protection of employment sites gives no encouragement to the consideration of the industrial heritage of sites and seeking to preserve architecturally and historically important aspects but it is noted that this is required in DM21 Design aesthetics.

Looking at the two sets of policies what is striking is their strength in the social SA objectives, supporting housing, particularly targeting affordable housing where it is needed (thereby

addressing social inclusion and deprivation issues), maintaining services and improving the quality of where people live. Economic objectives are well balanced, seeking to provide employment well located to new housing growth but recognising the need for evolution of employment in the rural area. The minimisation of waste and encouraging recycling is a weakness in the environmental objectives as so much depends on 4 words in one policy (SP12).

## 7.9 Implementation and monitoring

Link to other tiers of plans and programmes

This sustainability appraisal for the Suffolk Coastal Core Strategy and Development Management Policies will form a context for other Suffolk Coastal planning documents, particularly the Site Specific Allocations and Policies, and Area Action Plans for Felixstowe Peninsula, Leiston and Saxmundham and Martlesham, Waldringfield and Newbourne. 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 ageing population could be considered here.

Proposals for monitoring

Table 7.6 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 1 sets out the long list of SA indicators with the full definitions that ideally need to be monitored but Table 7.6 focuses on the key concerns, including those raised in the SA itself. This is the same list as shown in table 6.8 as no new issues have been raised with the development control policies requiring specific additional monitoring.

*Table 7.6: 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 and catchment areas using Water Framework Directive system of classification.
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 advice. 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 advice services from within/outside area. Business start ups and closures. Employment land availability. Employment permissions and allocations.

## 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
SMR	Sites and Monument Record
SPA	Special Protection Area
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
SUDS	Sustainable Urban Drainage System

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