



Sustainability Appraisal of Modifications to the Core Strategy & Development Management Policies and Revocation of RSS Options

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

February 2013

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NON-TECHNICAL SUMMARY

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 is an addendum to the sustainability appraisal of Suffolk Coastal District Council's Core Strategy and Development Management Policies (November 2011) that takes into account the modifications requested by the Inspector in December 2012, following the hearing into the plan. These policies will, when formally adopted, form part of Suffolk Coastal District Council's Development Plan Framework. This non technical summary is an update of the full summary in the November 2011 sustainability appraisal to enable the addendum findings to be understood in context.

Baseline information on key aspects of the environment, economy and society published in the Scoping Report (2006) were updated for the November 2011 and has not been revisited for the purpose of this addendum. There are two Air Quality Management Areas in the District. 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, Special Protection Areas, Special Areas of Conservation and Sites of Special Scientific Interest.

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. This suggests that implementation of a growth strategy using the Suffolk Coastal objectives will be challenging for the reduction of waste and appropriate mitigation will be to ensure policies encourage recycling and waste minimisation.

This addendum 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 (draft Preferred Options) December 2007. This looked at the Core Strategy policies and alternatives. Some draft preferred policies did not have options because the area of concern had been discussed in the Issues and Options paper 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).

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

The 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. 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 the sustainability appraisal, the Appropriate Assessment and from Natural England decided that with the appropriate mitigation measures, at least 7,900 houses could be accommodated in the District, with 29% of these being located in the East Ipswich area, east of the A12. This location was preferred due to 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-three Development Management policies have been appraised, the results being compared to the previous policy appraisal. The appraisal takes into consideration the policy in the Ipswich Borough Council Core Strategy that allocates land in north Ipswich 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. In this addendum all modified policies have been reappraised.

Likely significant effects of core strategy policies and mitigation required

The assessment of the modified policies alongside the rest of the core strategy policies has not resulted in any significant change in their overall sustainability. The core strategy policies are likely to have greatest impact on achieving sustainable levels of prosperity and economic growth throughout the plan area, improving access to key services, offering rewarding employment 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.

Issues arising are:

Air Quality/ Traffic generation: 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 has been 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. The assessment of the modifications has raised a concern about the proposal for a new road in Felixstowe.

Retail centres

SP9 *Retail centres* is assessed to be generally sustainable but the omission of Martlesham Retail Park and the role it could play in maintaining a flourishing retail environment within Suffolk Coastal has resulted in some concerns for negative impacts relating to concentrating traffic movements in historic towns with narrow roads. There may also be pressure on towns to accommodate development that may not be in keeping with their character whilst a lack of clarity about accommodating larger scale retail could lead to it being lost to neighbouring districts.

The following mitigation proposals are recommended:

- SP21 *Felixstowe* needs to include encouragement of investment in public transport and sustainable travel infrastructure to reduce demand so that the need to improve the capacity of the local road network and solution by means of a new link road is an option of last resort if other actions fail.
- Combine SP9 *Retail centres* and paragraph 3.92 to clarify the sequential approach and potential role of out of centre retail locations for a limited number of larger scale modern retail developments.

Likely significant effects of the development management policies and mitigation required

Fewer development management policies have been modified. The development management policies will specifically assist conservation and enhancement of the quality and local distinctiveness of landscapes and townscapes, improve the quality of where people live and to encourage community participation.

There are now no issues arising requiring mitigation.

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 employment in the rural area. The plan is weakest in the minimisation of waste and encouraging recycling although a minor modification to the supporting text of DM22 *Design – Function* (following a previous SA recommendation) now notes the need to incorporate the need to accommodate larger bin storage areas as an example of functional design that would be sought through the implementation of the policy.

Difference the process has made

This Sustainability Appraisal has provided an independent assessment of the Core Strategy, development management policies and the options for housing sites. It follows appraisals undertaken in December 2007, October 2008, July 2009, June 2010, November 2010 and December 2011. Many of the recommendations for changes to the wording of policies made at those stages have been taken up, and this new appraisal confirms that the core strategy policies are sustainable and only two issues remain where mitigation may be possible. This latest iteration of sustainability appraisal has resulted in the addition of wording /major rewording of two policies to make them legally robust and afford adequate protection and management to international and national environmental designations. 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.

How to comment on the report

If you would like to comment on this report, please contact:

Development.policy@suffolkcoastal.gov.uk

Or view the document and comment on the Council's online consultation system at:

[HTTP://SUFFOLKCOASTAL.JDI-CONSULT.NET/LDF/](http://suffolkcoastal.jdi-consult.net/LDF/)

PART A

Suffolk Coastal District Council Core Strategy – SA of Modifications January 2013

1. Introduction

1.1 Since the completion of the Sustainability Appraisal (SA) for the Pre-submission Core Strategy and Development Management Policies (December 2011) the National Planning Policy Framework (NPPF) has been published (March 2012), the East of England Regional Strategy has been revoked (3rd January 2013) and the hearing has been held on the Suffolk Coastal Core Strategy. The plan has been updated in the light of these and a schedule of Main Modifications agreed with the Inspector. The Inspector has also requested that Sustainability Appraisal be completed on the reasonable alternatives to the overall amount of housing.

1.2 Part A of this addendum systematically reviews the schedule of Main Modifications to update the Sustainability Appraisal completed on the Core Strategy and Development Management Policies December 2011. Part B examines three options:

- The modified overall housing figure – 7,900 houses
- The objectively assessed housing need figure – 11,000 houses
- Suspend or withdraw the plan now and start again.

The assessment of the modified overall housing figure – 7,900 houses has been included in Part A for SP2 Housing.

2. Scoping context

2.1 The NPPF sets out the Government's planning policies for England and how these are expected to be applied. There is a presumption in favour of sustainable development and a requirement that Local Plans should meet objectively assessed needs unless any adverse impacts would outweigh the benefits when assessed against the policies in the NPPF as a whole or where specific policies in the framework indicate that development should be restricted, for example on sites protected under the Birds and Habitats Directive, Sites of Special Scientific Interest (SSSIs), Areas of Outstanding National Beauty (AONBs), Heritage Coast, designated heritage assets and locations at risk of flooding or coastal erosion.

2.2 The core planning principles set out in Paragraph 17 of the NPPF are consistent with the SA Framework. The NPPF does not set out targets however the requirement that the Local Plan should meet objectively assessed housing needs is an issue for Suffolk Coastal. The plan was developed when it was required to be consistent with the East of England Regional Plan and then latterly to reflect locally agreed levels based on local factors. Part B of this report deals with the options available for the amount of housing. Part A reviews the changes made to the policies and the implications for the SA, taking into account the national level policy now articulated in the NPPF.

3. The appraisal of the modified policies

3.1 A full list of the modifications is set out in Appendix A with a summary of the SA implications noted for each change. This builds on what has already been done, using the same baseline analysis of the key issues for the District and the same SA Framework. Where changes have been made to the wording and the contextual supporting information to a policy, its original appraisal sheet from the December 2011 SA has been reviewed and updated as necessary. For completeness a full set of the sheets for the Strategic Policies (a total of 30 policies) and for the Development Management policies (33 policies) have been included in Appendix B and C respectively. Not all of the changes have implications for the SA – for example in several

cases following the guidance in the NPPF, policies have been reworded so they read positively – in terms of the conditions in which development will be permitted rather than saying development will only be permitted in these circumstances. In these cases the changes have no material impact on the SA, even though the policies sound more welcoming to development than previously.

- 3.2 As part of this latest iteration of the SA the draft report highlighted issues with modifications to:

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

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

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

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

As a result further changes were made to supporting text, policy wording and list of saved policies and agreed with the Inspector. The following appraisal takes into account these changes.

- 3.3 The next section looks at the individual changes by policy and then the overall implications for the plan, first for the Core Strategy Policies and then for the Development Management policies.

4. Strategic Policies (SP)

- 4.1 There are now 31 core strategy sheets in Appendix B as one has been added to deal with the addition to SP1 Sustainable Development (called SP1 a). Policies that have not been the subject of a modification are marked “No change” in the title bar but are included for completeness. Of the 31 sheets, 19 have been updated (text has been updated and the sheets marked in the title bar “Updated”) of which 12 have resulted in changes to the assessment of positive and negative impacts (signified by ++, + etc). Most of these changes do not trigger a need for mitigation. Mitigation actions are suggested for 2 policies.

- 4.2 The following details where the assessment of positive/negative impacts has changed and whether consideration of mitigation is recommended.

SP1 Sustainable development

- 4.3 Emphasis in the policy has shifted to prioritising previously developed land and buildings in and around built up areas ahead of greenfield sites. The omission of priority to the redevelopment of appropriate former agricultural complexes suggests such areas could be overlooked and fall derelict in rural areas resulting in a less positive impact for SA11 *To conserve soil resources and quality*. However the Development Management policies DM13 and DM14 allow appropriate development of former agricultural complexes so no mitigation is necessary.

SP1a NPPF model policy insert into SP1

- 4.4 This supplementary appraisal suggests this addition will have a positive impact as the wording emphasises finding solutions so proposals can be approved and without delay if

they accord with policies in this plan or if adverse impacts do not outweigh the benefits when assessed against the policies in the NPPF. SP1a will have a significantly positive impact on SA20 *To achieve sustainable level of prosperity* and SA 23 *To encourage and accommodate indigenous and inward* . No mitigation is required.

SP2 Housing

- 4.5 The housing figure has been raised to 7,900, up by 310 on the policy appraised in the submitted plan and it is now planned to begin an early review of the housing strategy by 2015. The differences between the figures is small in a strategic context and the updating reflects the situation that on SA13 *To reduce waste*, more housing will increase waste but it should of previously been recognised, might trigger improved management for example more effective composting schemes leading to less waste for public disposal. On SA23 *To encourage and accommodate indigenous and inward investment* it is logical to suggest that this level of new housing development will encourage business to locate in the district and infrastructure providers to invest in upgrades. The policy is likely to have a positive impact overall although mitigation is required, particularly in terms of controlling the impact of recreational demand on the Deben SPA and follow up monitoring to ensure the mitigation is effective. The plan now has mitigation requirements related to these concerns written into SP20 and SP21.

SP4 Gypsies, travellers and travelling showpersons

- 4.6 Two changes to the plan have been made. The supporting text now states that the small number of gypsies identified as having needs are expected to approach the Council direct. This clarifies why the policy itself only refers to liaising with “new traveller” groups and that dialogue would in fact take place with both groups. The addition of wording concerning the suitability of sites in rural or semi-rural areas will ensure the scale of sites do not dominate the nearest settled community and is deemed to benefit SA 19. *To conserve and enhance the quality and local distinctiveness of landscapes and townscapes*. No mitigation is required.

SP 8 Tourism

- 4.7 Two changes to the assessment have been made. The modified policy allows small scale new development in unexposed areas of Suffolk Coast and Heaths AONB. Although this is unlikely to have an impact on the landscape of the AONB because the policy requires landscape assessment to be undertaken, there is a concern that the cumulative impact of new traffic movements generated could impact the daily life in recipient communities (make it difficult to cross the road, road safety concerns and raise localised air quality issues). Hence *To reduce the effects of traffic on the environment* has become negative (previously weakly negative 0/-) and SA 17 *To conserve and enhance biodiversity and geodiversity* becomes weakly positive (0/+). No mitigation is required as this will be fulfilled by DM 20 Travel Plans and DM 23 Residential Amenity.

SP 9 Retail centres

- 4.8 SP9 has been modified to reflect the sequential test required in the NPPF. Martlesham Retail Park (centred around Beardmore Park) and Purdis Farm has been removed from the policy and supporting text states that further development at these areas will be resisted where it would compete to the detriment of the viability of the district’s market towns and other identified neighbouring retail centres (now listed in SP9). This has been reflected in the updated assessment of SP9.
- 4.9 The policy is assessed to be generally sustainable but the omission of Martlesham Retail Park and the role it could play in maintaining a flourishing retail environment within Suffolk Coastal has resulted in some concerns for negative impacts relating to concentrating traffic movements in historic towns with narrow roads. SA9 *To maintain and where possible improve air quality* and 14. *To reduce the effects of traffic on the*

environment have consequently been assessed slightly negative 0/-. Pressure on towns to accommodate development that may not be in keeping with their character has resulted in a negative for SA 19. *To conserve and enhance the quality and local distinctiveness of landscapes and townscapes*. There is also concern for SA 23. *To encourage and accommodate both indigenous and inward investment* as a lack of clarity about accommodating larger scale retail could lead to it being lost to neighbouring districts. It is suggested mitigation is possible and required.

SP 19 Settlement Policy

- 4.10 The update changes the distribution of housing through the settlement hierarchy. Within the hierarchy, settlements are categorised according to sustainability factors including size, level of facilities, and their role in relation to their locality and neighbouring settlements, as well as their physical form. Accordance or not with the hierarchy is the first issue of principle to which any future site allocation or individual development proposal should accord. It is understood that the apparent allocation of 12% of the housing requirement (950) to Other Villages and countryside is windfall that is actually likely to be spread throughout the District. The assessment shows a high level of sustainability although the cumulative impact with Ipswich Borough's housing provision of recreation demand on the European designated areas is a concern. As mitigation for this is included in SP20, no further mitigation is required. The modification has strengthened the policy by the addition of specific reference to maintaining and enhancing the historic environment.

SP20 Area East of Ipswich

- 4.11 The policy has become more sustainable following the addition of wording relating to the mitigation requirements linked to the Adastral Park development. The modifications include reference to improvements to water supply networks, upgrades to waste water treatment and provision of strategic drainage to manage surface water drainage linked to the Adastral park development so SA 10 *To maintain and where possible improve water quality* has changed from a weak negative assessment to positive. Several negative impacts are likely to be reduced (eg SA 13, 14 and 15) and the controls in place for the protection of biodiversity now mean there is a real possibility that development could improve the biodiversity of the area in the longer term.
- 4.12 The policy now acknowledges the need for site specific appropriate assessment of the proposal to use land immediately abutting Adastral Park and for an Area Action Plan recognising the sensitivity of the Deben Estuary SPA. Special attention needs to be given to the protection of the Deben estuary in the Area Action Plan to ensure its environmental quality is not damaged and also how the quality of life for popular recreational destinations can be maintained. The Appropriate Assessment (AA) for the Core Strategy (2011) states that a 1km separation of strategic allocations from European sites is necessary, plus improvements to local greenspace for routine use. This needs to be provided in the Area Action Plan and needs to be available when housing in the Adastral Park area starts to be occupied so local routines are established from the outset that minimises pressure on the Deben SPA. The AA suggested a new Country Park (or similar high quality provision) is needed to mitigate the cumulative effect of new housing provision in IBC and SCDC. As IBC propose the provision of a country park within the northern fringe allocation, plus the modified policy here requires it for the Adastral Park development, provided both are available when houses are occupied, adverse impact on SPA designations should be avoided. Monitoring is needed but no further mitigation at this time.

SP21 Felixstowe

- 4.13 The modified policy proposes getting developer contributions to mitigate the environmental impact of new development on the Orwell and Deben estuary SPAs and towards the provision of strategic open space identified in SP20.

Enhanced access to green space and the countryside will be considered in the context of enhanced wardening and monitoring of visitor impact on designated European Conservation sites. The policy also now considers the impact on strategic and local roads and suggests this will be managed but the suggestion of a new link road has resulted in the change in the assessment for SA 14 *To reduce the effects of traffic on the environment* as any new road provision will encourage traffic movements and not the reduction in the use of cars. However due to the inclusion of the mitigation measures linked to the environment, the policy is much more sustainable than the previous version and nothing emerges that requires mitigation other than the suggestion that a new road be considered to improve capacity.

SP24 Leiston

- 4.14 The policy as modified is more positive about housing taking place in Leiston giving priority to affordable housing. Nuclear safeguarding will influence where future of expansion of the town to the east will be but brownfield and greenfield sites are available. The appraisal has been updated and the policy is still sustainable overall. Increase in waste water flows to Leiston sewage works should be controlled through the application of SP1 and SP2 which require provision of appropriate infrastructure in a timely manner. No additional mitigation required.

SP25 Saxmundham

- 4.15 The strategy allows development for local needs that might be higher now the uncertainty about the school has been resolved and a Free School opened in Saxmundham. This change in local circumstances has been reflected in the appraisal for SA2 *To maintain and improve levels of education etc* as the continuation of the school improves the education options locally and offers facilities for extra curricular activities and adult education. The modified policy does not require an Area Action Plan to be prepared and this could encourage quicker growth. As attention will be given to environmental factors when detailed planning proposals are considered, encouraged by other policies in the plan, no further mitigation is necessary.

SP26 Woodbridge

- 4.16 The modified policy means there is less constraint on housing development but what will be permitted will be appropriate to the physical and environmental constraints. The overall sustainability of the policy has improved due to the change to a strongly positive impact on SA6 *To offer meet the housing needs of the whole community*. Increasing the level of housing and employment and encouraging tourism will lead to the generation of more traffic that could impact air quality depending on location, and will result in energy being used either in transport or running homes. The policy also notes that the quality of the riverside and estuary and related environmental quality be regarded as a constraint. Traffic management in Woodbridge is proposed so it is not disadvantaged by its 'gateway' role, especially considering the challenges of the location of the existing Air Quality Management Area. There are focused core strategy environmental policies elsewhere that will be brought to bear when planning applications are determined hence this is not a concern. No mitigation required.

SP29 The Countryside

- 4.17 The modified policy allows development which of necessity requires to be in the countryside. The assessment has been completely updated and is overall more sustainable than it was, with economic and social benefits whilst the negative

implications will be controlled by application of DM policies or will be very small scale. No additional mitigation required.

Mitigation

- 4.18 **SP9** and paragraph 3.92 should be combined to clarify the sequential approach and potential role of out of centre retail locations for a limited number of larger scale modern retail developments. Offering an alternative location for very large scale developments that would not be appropriate in historic town centres will help preserve the charm of existing centres for a different shopping experience, helping to maintain their viability and tourism potential. It would also mean there would be no risk of development and associated jobs being lost to other Districts due to a restrictive policy.

SP21 Felixstowe

- 4.19 The policy needs to include encouragement of investment in public transport and sustainable travel infrastructure to reduce demand in the policy so that the need to improve the capacity of the local road network and solution by means of a new link road is an option of last resort if other actions fail.

Cumulative/secondary impacts

- 4.20 Cumulative/secondary effects have been considered for each policy and are summarised in the sheets included in Appendix B and remain the same as in the previous assessment. 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. 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.

5. Cumulative impact of the core strategy strategic policies

- 5.1 Table 2 summarises the overall results of the appraisal of all the core strategy policies. The appraisal system used to record the assessment of the direction of impact is as used in Appendix B:

Table 1: SA recording system

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

- 5.2 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 B. Two zeros are in the table because they have comments in Appendix B to explain why it is not thought there will be a significant impact. Appendix B 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.

- 5.3 Several adjustments to the impact assessment have been made as a result of the appraisal of the modifications plus the appraisal of SP1a has been added. Table 2 reveals the strengths and weaknesses of the core strategy strategic policies as a set, hence as a plan. We would expect to see SP1 Sustainability (+28) with the highest appraisal given its subject matter. Nine other policies achieved over +10, an increase on the seven policies achieving this in the appraisal of the submitted version of the plan... The reason for some of the higher positive assessments is due to the addition of text about mitigation measures, stemming from the Appropriate Assessment and discussion at the hearing in some policies, particularly SP20 East Ipswich and SP21 Felixstowe or the change in emphasis of wording resulting in it seeming more permissive of housing (e.g. SP 26 Woodbridge).
- 5.4 Only one policy SP3 New homes is appraised negatively for overall sustainability, and this was only slightly negative (-1). 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 significant concern.

6. Significant effects of the core strategy strategic policies

- 6.1 The assessment of the modified policies alongside the rest of the core strategy policies has not resulted in any significant change in their overall sustainability. Table 2 suggests that the implementation of the plan is likely to be particularly successful in achieving sustainable levels of prosperity and economic growth throughout the plan area (SA Objective 20 +30.5), in improving access to key services (SA5 +26), offering rewarding employment (SA6 +25.5), conserving and enhancing the quality and local distinctiveness of landscape and townscapes (SA19 +25), meeting the housing needs of the whole community (SA 7+24.5) and reducing poverty and social exclusion (SA4 +22.5). These are all the same objectives that were strongly positive in the submitted plan although achieving sustainable levels of prosperity has risen to the top due to the inclusion of SP1a that sets out the presumption in favour of sustainable development as expressed in the NPPF.
- 6.2 All economic SA objectives continue to have strongly positive assessments. None of the four economic objectives record negative impacts and the only uncertainty is discussed in SP9 Retail areas, due to the role of the Martlesham Retail Park.
- 6.3 The slightly mixed picture for the eleven environmental SA objectives continues. The set of policies clearly reflect and reiterate a concern for conserving and enhancing the quality and local distinctiveness of landscapes and townscapes (+25). The same four SA objectives continue to have negative overall assessments but as explained in the December 2011 SA, increasing housing will increase the amount of traffic and pressure

on air quality, waste and energy required but there are policies in the plan that seek to manage traffic (SP1), minimise waste production and provide effective management (SP12), and encourage renewable energy schemes (SP12).

- 6.4 The core strategy strategic policies are assessed to have a significant positive impact on all the social SA objectives, as previously. Implementation of policies are likely to be particularly effective in improving access to services, offering everybody the opportunity for rewarding and satisfying employment, meeting the housing requirements of the whole community and reducing poverty and social exclusion.

Table 2: Appraisal results of the 30 Core strategic policies

	1	1a	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/-	+	+	+	+	+	+	+					11.5
3. To reduce crime and anti-social activity					+		+							+			+		+											+		6
4. To reduce poverty and social exclusion	++		+	++	+	+	+/-	++	+			+		++				+	+	0/+	+	+			+	+	+	++				22.5
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	+	+	++	++	+	+	+	+	25.5
7. To meet the housing requirements of the whole community	+		++	++	+	0/-								++						++	++	++	+	+	+	+	++	++	+	+	+	24.5
8. To improve the quality of where people live and to encourage community participation	+		+		+		+		0/-		+	0/+		+	+	+	++	++	+	+	+	+		0/+	+	+	+				0/+	20
9. To maintain and where possible improve air quality	+		-	-		0/-	-	-	0/-	0/-	-	+	++	++			+	+	+	++	-	+/-		-	-	-	--					-1.5
10. To maintain and where possible improve water quality	+		+			-			0				++	+/-	++				+		+	+			0/-	0/-	0/-					6.5
11. To conserve soil resources and quality	+		-	+		-		0/-	0/-				+	-	+	+		0/+		-	--	+	+	+	+/-	-			+	-	+	1.5
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/-		-		-10.5
14. To reduce the effects of traffic on the environment	++		-	-		0/-		0/+	-	0/-	--	+		+			+		+	++	0/-	-	0/-	0/-	-	-	0/-	0/-				-4

15. To reduce emissions of greenhouse gases from energy consumption	+		-	-	0/-	-		0/-	-	+	++								0/-	-	0/-	0/-	-	-	-	+/-				-6.5		
16. To reduce vulnerability to flooding	+		+	-	+/-			0/-	?		++	+				+			-	+	++	0/-	-	--	-		+		++	5		
17. To conserve and enhance biodiversity and geodiversity	++		-	0/-	+			0/+	0/+	-		+	+	++	+		+		-	+	0/-	0/-	0/-		-	+	0/-	++	?	+	8.5	
18. To conserve and where appropriate enhance areas of historical and archaeological importance	+		-	0/-					+										+	-	+							+			4.5	
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	++		+		+		-	0/-	++	-	+		+	++	++		+		+	+	++	++	++	++	+	+	0	++	0/-	+	25	
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	++	++	+			++	++	++	++	+	+		+	++	+	+/-			+	+	0/+	+	+	+	+	+	+	+	++		30.5	
21. To revitalise town centres	+					+	++			+									+		+	+			+	+					10	
22. To encourage efficient patterns of movement in support of economic growth	++		++				++			+		+	+		+			+		+		+				+	+				18	
23. To encourage and accommodate both indigenous and inward investment	+	++	+			+	+	+	+	?	+	+		+					+	+		+	+	+	++			+			19	
TOTAL	28	3	9	-1	6	3.5	7	5.5	5	1	1	10.5	15	15	10	7.5	8	9.5	13	12	5.5	15.5	8.5	8	5.5	2.5	10.5	7.5	12	3.5	6.5	255

7. Development management policies

- 7.1 There are 33 development management policy sheets in Appendix C. Policies that have not been the subject of a modification are marked “No change” in the title bar but are included for completeness. Of the 33 sheets, 14 have been updated (text has been updated and the sheets marked in the title bar “Updated”) of which 2 have resulted in changes to the assessment of positive and negative impacts (signified by ++, + etc) and one other is worthy of comment due to how it relates to previous SAs.

DM 3 Housing in the countryside

- 7.2 The modified policy is positively expressed to allow development in certain circumstances. The assessment recognises that new development will generate waste and that it is unlikely that the volumes would trigger recycling facilities so is recorded as negative but it is not significant enough to warrant mitigation. Overall the policy is sustainable and any concerns about biodiversity will be considered by DM 27. No mitigation is required.

DM9 Gypsies, Travellers and Travelling showpersons

- 7.3 The modified policy recognises new Travellers have the biggest need and that self management of sites is allowed for up to 10 pitches. Although the appraisal has not changed and this is a largely sustainable policy, it raises an issue about the protection of archaeological sites. SCDC do not have a policy but rely on national policy statements. This is now the NPPF and paragraph 126 states that an LPA “should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.” Para 128 of the NPPF sets out what the LPA should consider if a planning application impacts a historic asset and would be sufficient to mitigate for this policy.

7.4 DM 24 Sustainable construction

The policy has been modified to focus on standards for residential homes and there is now no specific requirements for employment development to meet. No mitigation is required as carbon reduction for employment development is included in the building regulations. The policy makes reference to considering information on the viability of a scheme and to reduce building standards rating where justified. This was previously overlooked and the appraisal updated to a positive impact on SA 23 *To encourage and accommodate both indigenous and inward investment.*

DM27 Biodiversity and geodiversity

- 7.5 This policy has been modified and the modified version was the subject of some discussion as its sustainability appraisal revealed concerns about the way it could be interpreted and how it appeared to not follow national guidance. It was further amended to what is now included in the Main modifications, demonstrating how sustainability appraisal is an iterative process and how it can make a difference The final policy is robust in its protection of biodiversity and geodiversity whilst recognising that there might be particular challenges in Suffolk Coastal that may meet the exceptional requirements of Article 6(4) of the EU Habitats Directive.

Actions taken as a result of the previous SA

- 7.6 The following changes have been made in the minor amendments picking up recommendations made in the last published SA for the submitted version (December 2011).

DM5 Conversions and Houses in multiple occupation

- 7.7 The supporting text now says locations close to a good range of services are likely to be the most suitable to this type of use (minor modification). This has removed the previous concern that conversions could be allowed in locations lacking services, as long as public transport available, that had led to a negative assessment for SA 5 *To improve access to key services for all sectors of the population.*

DM22 Design – Function

- 7.8 A minor modification to the supporting text to this policy recognises that provision of accommodation for larger bin storage to facilitate recycling is an example of functional design. Although this will not reduce waste, it will help facilitate recycling. The policies overall had previously been identified as weak in terms of minimising waste.

Cumulative/secondary impacts

- 7.9 Cumulative/secondary effects have been considered for each policy and are summarised in the sheets included in Appendix C. No new cumulative or secondary effects have been identified.

8. Cumulative impact of the development management policies

- 8.1 Table 3 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 C.

9. Significant effects of the development management policies

- 9.1 The assessment of the modified policies alongside the rest of the development management policies has not resulted in any significant change in their overall sustainability. As previously found, there is less range in the sustainability scores for the development management policies than those for the core strategy strategic policies. Only two DM policies are assessed negatively (DM11 *Warehousing and storage* and DM18 *Static holiday, caravans, cabins and chalets*) but neither require specific mitigation as the negative impacts will be controlled by the application of other policies. The scores for the SA objectives were more divergent ranging from +26.5 to – 12.5. 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 is still SA 19 *To conserve and enhance the quality and local distinctiveness of landscapes and townscapes* (+26.5).

- 9.2 Two of the environmental SA objectives scored negatively overall. SA13 *To reduce waste* was the worst (-12.5) although all the effects were weakly negative. This highlights that there is not a development management 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.

10. Overall effect of the two sets of policies

- 10.1 Looking at the overall results shown in Tables 2 and 3 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, both are promoted in SP12. The plan is weakest in the minimisation of waste and encouraging recycling. although a minor modification to the supporting text of DM22 *Design – Function* (following a previous SA recommendation) now notes the need to incorporate the need to accommodate larger bin storage areas as an example of functional design that would be sought through the implementation of the policy. 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.
- 10.2 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 employment in the rural area.

10.3 General point relating to archaeological assets

Previous SAs have remarked about the lack of a clear statement on protection of archaeological assets. This has been considered in 7.3 above. Suffolk Coastal District Council make clear in the supporting text to SP15 *Landscape and Townscape* that they recognise the importance of archaeology and scheduled ancient monuments and consider their protection can be addressed outside the Local Development Framework and through the rigorous application of the NPPF. Decisions on development proposals affecting heritage assets will be informed as appropriate by archaeological assessments and information from the historic environment record. Hence no further mitigation is required.

11. Monitoring

- 11.1 No major issues have arisen from this appraisal of the modified policies that requires any update to the proposed indicator set out in Table 6.8 of the December 2011 Sustainability Appraisal.

Table 3: Results of the 33 development management 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	31	32	33	T
1. To improve the health of the population overall					+	+			+										+	+		0/+				+	0/+	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					+					+												++	+			+					0/+			6.5
4. To reduce poverty and social exclusion	++	++	+			+			+												+	+									0/+			9.5
5. To improve access to key services for all sectors of the population	+	+							+	+		+	+			+			+	+										++	0			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/+			0/-				13.5
8. To improve the quality of where people live and to encourage community participation			+			+		0/+	+/-	+		++	0			+	0/-	0/-	+	+	++	+	+		+	+/-	+		+	++	0	++	+	19.5
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/-									-				-												+		++					0
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/-	-															-		-
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/-	0/-	-	+	++			+		+			+					-4

PART B

Sustainability Appraisal of Revocation of RSS Options

1. Introduction

- 1.1 This is an addendum to Suffolk Coastal District Council's Sustainability Appraisal of Core Strategy and Development Management Policies December 2011. That document appraised the Core Strategy policies submitted to the government prior to the Examination. During the course of the Examination, the East of England Plan has been formally revoked and the Inspector is therefore seeking the views of the Council on options for progress. He has also separately requested that sustainability appraisal be completed on the objectively assessed housing need figure of 11,000 which had been incorporated as a Main Modification to the Core Strategy.
- 1.2 The appraisal below deals solely with the quantity of housing issue as raised by the Inspector in the modifications to policy as part of the independent Examination of the Core Strategy. This issue also needs now to be considered in the light of the introduction of the National Planning Policy Framework and the revocation of the East of England Plan. All other policy main modifications are to be examined in a separate SA document.
- 1.3 In the context of the recent revocation of the RSS three options as potential reasonable alternatives regarding housing, need to be assessed at this stage as a response to the revocation and the requirement of the NPPF to objectively assess housing need ;
 1. The modified overall housing figure – 7,900 houses
 2. The objectively assessed housing need figure – 11,000 houses. It is arguable that this option does not present itself as a reasonable alternative at this stage because it would require considerable further work including joint working to assess the capacity of the District to accommodate substantial further growth having regard to environmental capacity and mitigation and the requirement to match growth with sufficient infrastructure. The SA therefore has regard to these factors as indicated below.
 3. Suspend or withdraw the plan now and starting again to allow partnership working with adjoining local authorities to look at agreeing a revised overall housing figure and further options for the distribution of houses.
- 1.4 The following appraisal builds on the evidence base and methodology substantially set out in the December 2011 Sustainability Appraisal of the Core Strategy and Development Management Policies. The same SA Framework has been used.

2. Context to the Housing issue

- 2.1 The preparation of the Core Strategy has been based upon the strategic framework of the RSS – East of England Plan (EoEP) since its adoption in 2008, which was until its revocation part of the statutory development plan. It comprised a part of the Development Plan for Suffolk Coastal against which development proposals including the scale and distribution of new homes set out in the Core Strategy have been considered. The EoEP set the minimum level of housing, strategically determined and evidenced in a regional context that should be met in Suffolk Coastal and the wider Ipswich Policy Area over the period to 2021. It provided guidance as to how this requirement should be extrapolated over the longer term to enable individual local authorities to provide a 15 year housing land supply as required by national planning policy guidance.
- 2.2 In 2010 the Coalition Government confirmed its intention to abolish the regional strategies. This was re-affirmed through the Localism Act 2011 and on 3rd January 2013 the RSS was revoked. The impact of the revocation has been subject to its own environmental assessment. In accordance with the National Policy Planning Framework (NPPF) – March 2012, Local Authorities in the East of England need to determine what they think is a locally appropriate level of housing. They are under a “duty to co-operate” to ensure that planning at a strategic level is undertaken as appropriate e.g. Ipswich Policy Area. The Framework was adopted just prior to the Core Strategy

being submitted to independent Examination. The NPPF (Paragraph 14) requires that “*Local Plans should meet objectively assessed needs.... unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits*” or if specific policies in the Framework for example relating to sites protected under the Birds and Habitats Directives and/or designated as SSSI, local green space, an AONB, Heritage Coast or locations at risk of flooding or coastal erosion indicate development should be restricted.

- 2.3 In the context of considering the impact of the proposed Main Modifications to the Core Strategy as a consequence of the independent examination into its “soundness”, it is helpful to consider the alternative levels of housing discussed at the Hearings. To be found “sound”, the Core Strategy at that point (during the Examination Hearings in October/November 2012) was required to be in broad accordance with both the EoEP and with the NPPF.
- 2.4 SCDC had already considered whether they wanted to increase or decrease their housing figures in 2010 when the Coalition Government first announced its intention to revoke the regional strategies.
- 2.5 An updated objectively assessed housing need figure for the district over the period 2010 to 2027 was provided by modelling work compiled by Oxford Economics for the Council in 2010 and has been derived from the East of England Forecasting model (EEFM). This is a labour market forecasting model that extrapolates economic trends and then suggests the housing demand. Hence it is jobs led and based on assumptions as at 2010. This forecast a need for some 11,000 new homes in support of economic growth. This model is **unfettered by environmental and infrastructural constraints**.
- 2.6 Notwithstanding the observations noted in para. 1.3 above, the Council having had regard to all the relevant information and evidence, such as environmental and infrastructure constraints, determined on a lower housing figure of 7,590. That scale of provision was subject to SA and AA in November 2011. No change was made to the housing distribution agreed in the preceding Interim Core Strategy 2010. The Council re-iterated that it wanted to continue with the existing housing distribution and going with a figure of 11,000 may have needed a different distribution strategy. The pre-submission Core Strategy (dated December 2011) was the final iteration of this overall scale of provision and distribution. It is this which is the subject of independent Examination.
- 2.7 The Inspector undertaking the Examination in his letter dated 7th December 2012 confirmed that the Council could proceed to consultation on the Main Modifications i.e. modifications which he had determined go to the heart of whether or not the CS can be found sound. No Main Modifications are proposed to the distribution of housing across the district. Main Modifications (MM4) are however recommended in relation to policy SP2 overall housing numbers – an increase from 7,590 to 7,900. Main Modifications MM3, MM5 and MM6 are also relevant. The modification is more explicit to the Council’s intention in terms of an early Review of the Core Strategy by 2015.
- 2.8 In accordance with the Inspectors letter, dated 7th December 2012, the Council has also requested that this assessment considers the impact of 11,000 new homes, being identified as the full objectively assessed need for the plan period in accordance with the Framework.
- 2.9 The increase in housing numbers from 7,590 to 7,900 was proposed to correspond to the EoEP growth rate for Suffolk Coastal extrapolated to 2027. The Council has proposed that this increase of 310 homes, (equivalent to approximately 19 homes per year) should be included as part of a windfall allowance through the plan period.
- 2.10 The starting point for this assessment is the SA and AA work completed to date for 7,590 new homes set against the agreed housing distribution strategy and the available evidence. (The

evidence base has been taken to be that which is included within the Core Strategy Examination Document Library). Assessments have then been carried out for the alternative housing provision options i.e. 7,900 new homes and 11,000 new homes.

2.11 The following alternatives to the overall amount of housing are now assessed:

1. An assessment of the modified overall housing figure – 7,900 houses.
2. An assessment of the objectively assessed housing need figure – 11,000 houses.
3. An assessment of suspending or withdrawing the plan now to allow partnership working with adjoining local authorities, to look at agreeing an appropriate overall housing figure and further options for the distribution of houses in accordance with the objectively assessed new figure. An agreed new overall housing figure will need to take account of complex cross boundary interactions and influences, particularly those in relation to the wider Ipswich area.

3. Assumptions made concerning the three options now appraised

- 3.1 This appraisal builds on the evidence base and methodology set out in the December 2011 Sustainability Appraisal of the Core Strategy and Development Management Policies. The same SA Framework is considered to be appropriate for this appraisal. The focus of the appraisal of alternatives is the difference between the overall level of housing – it is not (and at this stage cannot be) a detailed appraisal of distribution options in relation to option 2. However some very general assumptions need to be made concerning the three options and these are set out below:

Modified overall housing figure 7,900 houses 2010 – 2027

- 3.2 This is an increase of 310 houses on the previously appraised total of 7,590. Modifications (MM18) to SP19 Settlement Policy sets out the following distribution:

Settlement Type	Description	Proportion of Total Proposed Housing Growth
Major Centre	Sub-regional centre for commercial and social facilities.	51%
Eastern Ipswich Plan Area		(29%)
Felixstowe Walton & the Trimley villages		(22%)
Towns	Focal point for employment, shopping and community facilities. A transport hub.	19%
Key Service Centres	Settlements which provide an extensive range of specified facilities.	17%
Local Service Centres	Settlements providing a smaller range of facilities than key service centres.	
Other Villages	Settlements with few or minimal facilities.	} 12% - includes district wide figure for windfall
Countryside	The area outside the settlements above, including the hamlets and small groups of dwellings that are dispersed across the district.	

- 3.3 The 310 increase will be accommodated through increased windfall that will be spread throughout the district, not exclusively in Other Villages or the Countryside. This option assumes one large greenfield site development in the East Ipswich area, on land to the south and east of Adastral Park.
- 3.4 The assumption is that land available for this level of development (7,900) is realistically available and that this could be released at a faster rate than 465 pa. Beyond this, any potential unmet need from the objectively assessed housing need would be addressed by early review of the Core Strategy commencing with the publication of an Issues and Options Report by 2015 at the latest. The review will identify the full, objectively assessed housing needs for the District.

Objectively assessed housing need 11,000 houses 2010-2027

- 3.5 This is an increase of 3,410 houses on the previously appraised total of 7,590. For this option, the distribution of at least 7,900 houses can be assumed from the existing Core Strategy proposal, but the remaining 3,410 has not been subject to a capacity analysis having regard to environmental and infrastructure considerations. However, the assumption of a similar distribution pattern is considered reasonable for this SA assessment, having regard to the currently available land in the SHLAA.
- 3.6 The Council's SHLAA housing capacity (see Main Modification MM3) identifies land available for around 7,730 houses with the majority being in the south of the District and greenfield sites. However the SHLAA sites are assessed individually - they are appropriately related to settlements with services and not in flood risk areas but have not been appraised in terms of any habitats regulations assessment impacts or cumulative sustainability impacts. They are a theoretical capacity which may be suitable and available for housing but have to be allocated through the statutory Local Plan process. As the policies for allocations are subject to Sustainability Appraisal, those policies determine the distribution that can be appropriately accommodated in the district given the economic, social and environmental constraints. As a large proportion of the SHLAA sites are located in the south of the District (south and including Woodbridge) this would focus development in the East Ipswich/Felixstowe area.
- 3.7 The evidence base has been checked for information on infrastructure assessments of needs for different levels of housing, namely Water Resource Plans, AECOM traffic studies and East Ipswich Infrastructure Study (Roger Tym & Partners, 2009) however only Anglian Water's Water Resource Management Plan takes a longer term view and is (based on RSS level of growth and ONS population projections), meaning that some of the water quality issues have already been considered and are not constraints.

Suspend or withdraw the plan

- 3.8 The proposed process of an early review has been assessed against a withdrawal and start again approach or the early review approach (taking into account the extent to which, if any, the existing spatial choices would or could compromise the later achievement of the higher number through the review process). Stopping the plan preparation process now would allow partnership working with adjoining local authorities to look at further options for the distribution of 11,000 houses stemming from a labour market model that will have commuter and infrastructure implications that will extend across local authority boundaries. However development would still come forward to meet the objectively assessed need but it will be where developers suggest which could make strategic decisions on infrastructure provision difficult.
- 3.9 As there would be no locally articulated policies, decisions would be based on the prevailing national policy framework set out in the NPPF.

4. Assessment of the options

- 4.1 The aim of this appraisal is to set out the main sustainability implications of each option. This enables the need for any mitigation actions to be identified. For each SA objective the impact on

the indicators associated with them (indicators are set out in Appendix 1 of the December 2011 SA) were considered and possible direction of impact recorded using the scoring system set out below. (Table 6.1 taken from December 2011 SA).

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

If the impact has been left blank the proposal is not thought to have a + or - impact.

Policy:	SP2 –Housing numbers		
Policy summary:	OPTION 1 - Provision of at least 7,900 homes across the district in the period 2010-2027, with an early review of the strategy 2015.		
SA objective:	Impact:	Comments / Mitigation:	
1. To improve the health of the population overall	+	Minimise need for motor vehicles, upgrade foot and cycle paths for access to employment, schools etc, maximise access to green space	
2. To maintain and improve levels of education and skills in the population overall	+	Appropriate infrastructure will be provided, may include schools	
3. To reduce crime and anti-social activity			
4. To reduce poverty and social exclusion	+	A mix of housing types including affordable will be beneficial for some communities whilst small scale development in rural areas will help reduce social exclusion of existing residents.	
5. To improve access to key services for all sectors of the population	++	The housing distribution strategy reflects access to services and encourages provision of infrastructure.	
6. To offer everybody the opportunity for rewarding and satisfying employment	+	Link to existing and proposed employment, improve access to such areas	
7. To meet the housing requirements of the whole community	++	Provides for appropriate scale of housing need for the district given recent trends. The modified policy allows additional housing which will be from windfall and hence dispersed throughout the district and any unmet need from the objectively assessed housing requirement will be addressed by the early review of the plan in 2015.	
8. To improve the quality of where people live and to encourage community participation	+	Requires associated new and improved infrastructure (deemed to cover doctors, recreational space, allotments, schools, meeting/community spaces)	
9. To maintain and where possible improve air quality	-	More housing will result in increased traffic and household air pollution, with particular concerns on the routes into Ipswich.	

10. To maintain and where possible improve water quality	+	Development will be supported by the provision of appropriate infrastructure which is important because there is likely to be extra effluent into the estuaries.
11. To conserve soil resources and quality	-	Likely to use greenfield sites
12. To use water and mineral resources efficiently, and re-use and recycle where possible	0	Previous water resource management plans based on regional studies and population projections already identify strategic needs
13. To reduce waste	+/-	More housing will result in increased waste but possibly improved management.
14. To reduce the effects of traffic on the environment	-	More housing will result in increased traffic
15. To reduce emissions of greenhouse gases from energy consumption	-	More housing will increase energy consumption
16. To reduce vulnerability to flooding	+	New development, although potentially increasing runoff, would be designed to sustainable standards including taking measures to reduce vulnerability to flooding, e.g. SUDS.
17. To conserve and enhance biodiversity and geodiversity	-	Biodiversity could be negatively affected by housing increases, however environmental constraints noted. Use of small brownfield sites and gardens may also impact upon biodiversity and this pressure is increased through the policy modification that envisages a higher level of housing provided by windfall sites. Areas screened as important for nature conservation will have housing phased to accord with agreed mitigation.
18. To conserve and where appropriate enhance areas of historical and archaeological importance	-	Archaeological sites may be damaged, particularly in the Ipswich Policy Area, where a large proportion of houses are allocated to be built
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+	Seeks to take account of scale appropriate to community
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Phased new housing to link to existing and proposed employment
21. To revitalise town centres		
22. To encourage efficient patterns of movement in support of economic growth	++	New housing in settlements to bring people closer to jobs and services
23. To encourage and accommodate both indigenous and inward investment	+	Development will encourage business to locate in the district and infrastructure providers to invest in upgrades.
Assessment Summary		There are many social and economic positives to be had through linkages with existing structures of employment, service and transport areas which are found in the larger settlements. Consideration and mitigation will need to be given towards minimising the possible identified environmental impacts such as waste production, traffic generation, biodiversity losses, natural resource use etc.
Secondary, Cumulative or synergistic effects:		Research on recreational impacts on the Sandlings SPA and conclusions in the Appropriate Assessment suggest secondary and cumulative impacts from this level of housing growth plus proposals in the Ipswich area will be a concern for the popular destinations. Concerns cover dog walking, visitor frequency, traffic generation, congestion in villages (e.g. Waldringfield),

	demand for boat ownership and sailing club membership in the East Ipswich area.
Short/medium/long term effects:	Housing construction will use short term mineral resources and potential disruption of nearby communities. In the medium/long term there will be opportunities to develop significant infrastructure improvements. Longer term impacts on disturbance to Nightjars in the Sandlings SPA and wintering birds in the Deben estuary SPA are concerns.
Mitigation proposals summary:	Development should minimise the environmental resources used in construction and seek to use sustainable construction techniques. Where development is to take place away from major areas, the broad locations should be sought sequentially through larger communities so that isolated development does not occur. The Appropriate Assessment recommends 1km separation of strategic housing allocations from European sites and provision of a country park. The need to reduce demand for visits by providing local greenspace especially for dog walking plus management of popular destinations in SPAs to minimise disturbance to birds will be required. Local/cumulative concerns about traffic, congestion at popular recreation destinations and demand for sailing club membership in the East Ipswich Area need to be addressed in the preparation of more detailed planning documents such as the Martlesham Area Action Plan. Air quality monitoring will be needed on the main transport routes into Ipswich. Monitoring of the impacts on the numbers of Nightjars in the Sandlings SPA and wintering birds in the Deben Estuary SPA will be required to ensure the mitigation measures are adequate. The modified policy includes reference to mitigation for areas screened for nature conservation issues and the need for appropriate phasing of development. There is a degree of uncertainty over the level of mitigation which may be required for housing numbers significantly higher than 7,900, and fresh assessments may need to be considered. However, mitigation for the dispersed windfall will be handled on a site by site basis and DM27.

Policy:	SP2– Housing numbers option		
Policy summary:	OPTION 2 - Provision for at least 11,000 houses between 2010-2027 in a similar pattern of distribution to the Core Strategy proposal.		
SA objective:	Impact:	Comments / Mitigation:	
1. To improve the health of the population overall	+	Largely focuses development to where opportunities for healthy living (access to open space, cycle paths will be provided). A large proportion of the development is likely to be in Major centres or Market towns (if it assumed SHLAA sites would come forward) where employment would be provided so could minimise the use of motor vehicles and encourage walking and cycling. Much of the new housing would be in urban extensions which would improve active travel opportunities. In smaller communities, new development may trigger the need for the provision of further substantial health facilities.	
2. To maintain and improve levels of education and skills in the population overall	?	New school provision would be phased for specific allocations, whilst in rural areas small scale housing could mean underutilised facilities are better used. However there could be pressure for school places in some areas, particularly where there would be an under capacity and doubt as to whether contributions could effectively make up the deficit.	
3. To reduce crime and anti-social activity			
4. To reduce poverty and social exclusion	+	A mix of housing types including affordable will be beneficial for some communities whilst small scale development in rural areas will help reduce social exclusion of existing residents.	
5. To improve access to key services for all sectors of the population	?	Most of the development will be in settlements that have a range of services or will trigger improvements. However this may not be the case in all settlements. There is also a risk that if starts are made on 2 or 3 major greenfield sites simultaneously in the East Ipswich area that if delivery slows, then communities could be left with undeveloped services if individual thresholds for provision are not reached.	
6. To offer everybody the opportunity for rewarding and satisfying employment	?	11,000 houses is linked to a labour market projection for jobs growth in the District. If the jobs did not materialise there would be increased commuting flows out of the District to Ipswich and beyond.	
7. To meet the housing requirements of the whole community	++	The number and mix of housing will meet the objectively assessed level of need.	
8. To improve the quality of where people live and to encourage community participation	+/-	Incomers will boost community participation. Housing allocations in Major centres and towns will have facilities phased. The 11,000 housing need figure has not been subjected to the same level of public consultation as previous figures and could lead to feelings of discontent with the planning process and ultimately lower levels of engagement with Suffolk Coastal District Council.	
9. To maintain and where possible improve air quality	--	More housing will result in increased traffic, rush hour delays and new localised air pollution hot spots in market towns and key service centres. There will be increased pressure on the routes into Ipswich (especially at the Heath Road Roundabout, currently an area of concern). The detailed impact of an additional 11,000 houses is currently untested and unknown.	

10. To maintain and where possible improve water quality	?	Possible pressure on the waste water systems may require further assessment. Eg. in Leiston.
11. To conserve soil resources and quality	--	The higher scale of development proposed would need further strategic greenfield allocations to be made.
12. To use water and mineral resources efficiently, and re-use and recycle where possible	0	Previous water resource management plans based on regional studies and population projections already identify strategic needs
13. To reduce waste	+/-	More housing will increase waste but possibly improved management.
14. To reduce the effects of traffic on the environment	--	Potentially increased traffic on the major routes into Ipswich, across the Orwell Bridge, A12/14 into Ipswich, A12 north and south of Woodbridge and within smaller settlements. Could result in more queuing vehicles, truncating some settlements and changing the ambience of more rural roads along the coast and into towns. The detailed impact is currently untested and unknown.
15. To reduce emissions of greenhouse gasses from energy consumption	-	More housing will increase energy consumption and some may be dispersed in a way unlikely to make renewable energy schemes viable.
16. To reduce vulnerability to flooding	+/-	New development, although potentially increasing runoff, would be designed to sustainable standards including taking measures to reduce vulnerability to flooding, e.g. SUDS. However more people could be located in rural settlements and potentially isolated by flooding events.
17. To conserve and enhance biodiversity and geodiversity	--	Some market towns have environmental constraints which would put pressure on those having to take a much higher level of growth. Biodiversity would be impacted through the loss of small sites in dispersed settlements and from the increased pressure for recreational use of the Deben estuary SPA and Sandlings SPA. The rate and scale of development in the Ipswich area is a major concern as the proposal for 7,900 houses has already demonstrated that this level of housing would challenge environmental thresholds and require significant mitigation. Although a new "country park" equivalent would have to be provided in the major allocation(s) the increase in unidentified housing and the cumulative impact this will have on coastal and estuarine access points is a critical concern. There would need to be reasonable certainty that such major mitigation could be provided. These concerns will be heightened further if multiple starts result in slow completions and the inability of developments to provide mitigation in a timely manner.
18. To conserve and where appropriate enhance areas of historical and archaeological importance	-	Archaeological sites may be lost, particularly in the East Ipswich area where greenfield sites may need to be allocated for development.
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	?/-	Increase in development in the dispersed smaller settlements in the AONB will likely have an incremental cumulative impact in 10 years that will be difficult to control. The level of development proposed cannot be accommodated in some of the market towns without impact on Conservation Areas, either through physical change to townscapes or from pressure from retail development following population growth.

20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Provision of homes to meet labour market needs will improve mobility throughout the area.
21. To revitalise town centres		
22. To encourage efficient patterns of movement in support of economic growth	?	A high proportion of the housing will be in major centres and towns. There is a concern that this level and pace may not be matched by appropriate planning for major infrastructure improvements – for example the capacity of the Orwell Bridge or need for a Northern bypass for Ipswich, however further work is needed.
23. To encourage and accommodate both indigenous and inward investment	+	Level of growth is above what has been achieved in the past 20 years and could attract additional investment in service and recreation industries.
Assessment Summary	<p>The key concerns are that this higher scale and rate of development needs to be fully tested so as to be confident that it does not outstrip the ability of measures to protect the sensitive environmental designations to respond. The full impact of the higher scale of growth cannot be properly assessed and tested without updating key parts of the evidence base eg. housing need studies, environmental capacity analysis, availability of mitigation measures and infrastructure studies etc. The proposed level of development is unlikely to be possible in some market towns and key settlements due to environmental constraints: habitats, landscape impact in the AONB, impact on Conservations area and historic cores, flood plains and coastal flooding constraints in addition to infrastructure needs such as sewage disposal, school places and doctors surgery places. The assessment for 7,900 homes has already demonstrated through its Appropriate Assessment that it is a scale of development that challenges the capacity of local environmental designations to be able to accommodate without specific mitigation measures. It is a particular concern that the higher level of housing could mean more to dispersed smaller settlements which would have a cumulative impact on recreation pressure in the AONB and coastal honey pot locations. With 11,000 houses at least one additional strategic greenfield site may need to be identified in the East Ipswich area or other major urban area. This is likely to tip the balance of capacity of the Orwell Bridge in this time period unless there are major transport infrastructure improvements in the Ipswich Policy area. The full impact of transport matters cannot be estimated as the detailed studies have not been undertaken on a higher 11,000 figure.</p>	
Secondary, Cumulative or synergistic effects:	<p>Cumulative impact of housing development in the northern Fringe of Ipswich could increase the pressure for recreation on the Deben and Orwell estuaries, particularly for walking, cycling and boat ownership impacting the tranquillity of some parts and hence the habitat in these SPAs. There will be cumulative impacts with the temporary workers in the Sizewell area and level of permanent housing development that would result in the settlements in the AONB, on recreation visits to the AONB and Minsmere – exacerbating parking, congestion and traffic issues in coastal settlements at holiday periods.</p> <p>Cumulative impact of incremental increases in housing in some smaller settlements (e.g. 1 a year) may increase vulnerability to flooding.</p>	
Short/medium/long term effects:	<p>Housing construction will in the short term use mineral and water resources and cause disruption in nearby communities from lorry movements etc. The medium to long term infrastructure requirements are unknown as the evidence base has not tested a significantly higher figure. Longer term impacts on disturbance to Nightjars in the Sandlings SPA and to wintering birds on the Deben estuary.</p>	

<p>Mitigation proposals summary:</p>	<p>Early review of the plan to facilitate strategic planning for infrastructure improvements to roads, schools and doctor's surgeries as these have a long-term planning, funding and delivery timescale and there is currently insufficient evidence to confirm that the current plans linked to the provision of 7,900 houses, will be adequate for significant further provision. Also to allow the appropriate range and scale of recreation management plans to be developed for the Deben estuary SPA. Major investment in visitor facilities realistically has a 5 year planning, funding and delivery timescale. Although the Deben Estuary Partnership is preparing a Management Plan with Flood risk assessment, it is not yet in a position of agreeing significant proposals for visitor management.</p> <p>Need to ensure service provision in smaller communities is adequate to serve the needs of increased housing before the housing is built. Large housing allocations need to be phased to avoid starts on several sites that result in incomplete communities with poor services if there are further economic recessions.</p> <p>Detailed attention will need to be given to the potential implications of increased traffic on routes into Ipswich and in market towns to ensure air quality hot spots do not increase or new ones emerge. Monitoring would be required to ensure mitigation measures were adequate.</p> <p>The Appropriate Assessment already undertaken recommends 1km separation of strategic housing allocations from European sites and provision of a country park in the major allocation at Adastral Park. Further substantial local green space recreation provision (such as a country park) will likely be required if another strategic greenfield site is allocated in the East Ipswich area or other major urban areas to protect the integrity of the Orwell and Deben SPA designations. Consideration would also have to be given to the likelihood or otherwise of sufficient mitigation being capable of provision if a strategy of greater dispersal is considered to be appropriate.</p>
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Policy:	Suspend or withdraw plan resulting in no adopted Core Strategy for Suffolk Coastal for a considerable period of time and commence a reassessment of housing needs		
Policy summary:	OPTION 3 - In view of revocation of RSS, reassess housing needs in association with other local authorities		
SA objective:	Impact:	Comments / Mitigation:	
1. To improve the health of the population overall	-	Incremental growth through opportunist planning applications would make strategic planning of health facilities difficult. Availability of cycling, pedestrian and recreational facilities to encourage active lifestyles are unlikely to be co-ordinated, funded or keep pace with population increase.	
2. To maintain and improve levels of education and skills in the population overall	-	Strategic planning will be hampered , with phasing and co-ordination problems as a result of individual developments.	
3. To reduce crime and anti-social activity	?	Will be handled by the provisions of the NPPF.	
4. To reduce poverty and social exclusion	- -	Likely to be fewer affordable homes provided and housing only in some locations leading to increased isolation in others.	
5. To improve access to key services for all sectors of the population	-	Difficult to co-ordinate use of contributions from developers. CIL would not be possible because no adopted Local Plan.	
6. To offer everybody the opportunity for rewarding and satisfying employment	?	May be issues in co-ordinating housing and employment development	
7. To meet the housing requirements of the whole community	--	In the absence of an adopted Local Plan there would be no coordinated approach to delivery and the provision of infrastructure and mitigation. Planning decisions would be ad hoc and possibly uncoordinated in the context of infrastructure and mitigation provision. . Possibility of under provision of housing due to uncertainty created by having no approved planning policy. Affordable housing would be provided in accordance with the existing Saved Policies, the requirement of which is the same as the proposed Core Strategy. There would be no local policy for gypsies and travellers, although the NPPF would apply.	
8. To improve the quality of where people live and to encourage community participation	--	Local people would not be empowered to participate in the distribution of homes as there would be no locally agreed allocations policy. Short term inadequate articulation of local planning policy would mean reliance on NPPF only.	
9. To maintain and where possible improve air quality	--	Depends on where development takes place – would need to consider traffic movements in each case but likely to be a lag to infrastructure changes.	
10. To maintain and where possible improve water quality	?	Liaison would be required with local water companies, could not guarantee no impact. There would be less certainty about where and when key infrastructure would be required.	
11. To conserve soil resources and quality	--	Greenfield applications likely and would need to be considered on their merits. NPPF prioritises brownfield but no local articulation of which sites should come forward.	
12. To use water and mineral resources efficiently, and re-use and recycle where possible	-	There would be no local policy requiring sustainable construction techniques which help use resources efficiently.	
13. To reduce waste	-	New development will produce increase in waste and less ability to plan waste infrastructure.	

14. To reduce the effects of traffic on the environment	--	Less ability to strategically plan road improvements without recourse to longer term strategic transportation infrastructure policy requirements.
15. To reduce emissions of greenhouse gasses from energy consumption	--	No ability to join up proposals and strategically plan because do not know what is coming up in what locations. Cannot advance Code for Sustainable Homes standards because no local policy.
16. To reduce vulnerability to flooding	+/-	New development, although potentially increasing runoff, would be designed to sustainable standards including taking measures to reduce vulnerability to flooding, e.g. SUDS. However more people would be located in rural settlements and potentially isolated by flooding events.
17. To conserve and enhance biodiversity and geodiversity	--	Difficult to strategically plan visitor management on Deben SPA due to ad hoc applications being made. More pressure from speculative development on land in/adjacent to villages that may have some biodiversity value.
18. To conserve and where appropriate enhance areas of historical and archaeological importance	-	Archaeological sites may be lost, particularly in the East Ipswich area where greenfield sites are most likely to come forward.
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	--	Difficult to control and plan mitigation for incremental development at appropriate rate and scale. Cumulative impact of less co-ordinated development even if individual applications recognise features.
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	-	Housing and employment growth locations would be dictated by applications and not co-ordinated. Scale of housing in one area may not match areas for employment. Could lose employment land to housing.
21. To revitalise town centres	-	No up to date local policy context for supporting town centres
22. To encourage efficient patterns of movement in support of economic growth	--	Infrastructure planning will lag planning applications because the locations approved may be quite different to what was expected or encouraged and the cumulative impact not anticipated.
23. To encourage and accommodate both indigenous and inward investment	?	Lack of an adopted plan will create a level of uncertainty that could deter investment into Suffolk Coastal and result in under-provision and/or incremental and uncoordinated growth.
Assessment Summary	A major propensity for serious negative impacts to accrue from not having any kind of strategy for the allocation of land to particular development uses. In particular employment land could be lost to housing and the level of provision of affordable housing is likely to be lower than if there were a plan in place. In the short term – ie the next 3 years there would be great uncertainty in Suffolk Coastal and the above appraisal suggests that ensuing negative impacts could create a legacy that could not be readily cured or brought back in control by the later adoption of a core strategy or appropriate local plan.. Local people would not be empowered to participate in the distribution of homes as there would be no locally agreed allocations policy. Short term inadequate articulation of local planning policy would mean reliance on NPPF which would not reflect the broader community aspirations for the District.	
Secondary, Cumulative or synergistic effects:	Multiple starts on sites could occur that could lead to incomplete developments and non-provision of infrastructure and environmental	

	mitigation measures. It would be more difficult to pool developer contributions from S106 and strategically provide for community facilities.
Short/medium/long term effects:	Short term there could be a frenzy of speculative planning applications or a very low level of housing delivery because of the level of uncertainty because there is no adopted plan. Inability to have a CIL will impact the ability to strategically co-ordinate community facilities in the medium/ longer term. However taking time now to co-ordinate the planning and delivery of a potentially higher level of development in the district would be of long term benefit for service and infrastructure planning.
Mitigation proposals summary:	Having been 6 years in the preparation the best mitigation for this policy would be to carry on to adoption of the plan and to embark on an immediate review. This would enable the Core Strategy to manage appropriate development, a CIL to be developed and at the same time reconsideration of the appropriate scale of development in the district, taking into account the environmental capacity and updated evidence base.

5. Conclusion

- 5.1 The NPPF (Paragraph 14) requires that “*Local Plans should meet objectively assessed needs.... unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits*” or if specific policies in the Framework for example relating to sites protected under the Birds and Habitats Directives and/or designated as SSSI, local green space, an AONB, Heritage Coast or locations at risk of flooding or coastal erosion indicate development should be restricted.
- 5.2 The appraisal of the three options shows that the planning process followed so far has suggested that delivery of 7,900 houses from 2010-2027 is a challenging but achievable level of sustainable growth as evidenced by the range of mitigation measures now built into the Core Strategy. The appraisal of 7,900 houses suggests more positive than negative impacts, with the strengths being for social and economic sustainability objectives but significant mitigation is required for the range of environmental objectives. Monitoring is also required, particularly of the Nightjars in the Sandlings SPA, wintering birds on the Deben Estuary SPA and of congestion and associated air quality on the main transport routes in to Ipswich to ensure mitigation actions are adequate and there is no risk of irreversible impacts accruing.
- 5.3 The appraisal of a higher level of housing growth (11,000 houses 2010 - 2027) is predominately negative/uncertain stemming from concerns that this higher scale and rate of development has not been fully tested and may outstrip the ability of measures to protect the sensitive environmental designations or to provide adequate infrastructure. The full impact of the higher scale of growth cannot be properly assessed and tested without updating key parts of the evidence base e.g. housing need studies, infrastructure studies etc.
- 5.4 The prospect of additional growth would need to take place in smaller settlements (Key Settlements and Local service centres), with many of the Local service centres not currently having the requisite range of services, yet the scale of development proposed may not be enough to trigger service improvements (e.g. a doctor's surgery). The Core Strategy as proposed does not envisage major infrastructure upgrades in the short term albeit the need to consider options for improving capacity and flow on the A14 is recognised (SP20) and support expressed for the bypass for 4 villages on A12 and upgrades to the A12/A1214 at Martlesham (SP10). The cumulative impact of this level of development and temporary housing for the Sizewell C development in the plan period would pose a particular challenge for the District's European designations and Suffolk Coast and Heaths AONB in terms of managing visitor numbers and holiday time traffic congestion in coastal settlements.

- 5.5 Suspending the examination of, or the withdrawal of, the Core Strategy now to allow more detailed assessment of options for delivery of 11,000 houses in Suffolk Coastal has the most negative implications of the 3 options. As demonstrated in the assessment above the uncertainty that could be created by having a local planning vacuum and dependency on the NPPF could have a long lasting and harmful legacy.
- 5.6 There are no short term benefits to stopping the plan adoption process now and it has a particular disadvantage that a Community Infrastructure Levy cannot be produced and agreed. A revised level of housing can be addressed in an early review of the plan. This is now written into the modifications to SP2. This means that a more strategic approach can be taken to the infrastructure implications for the district if additional strategic greenfield sites are identified for delivery in 2017-2027, in effect the latter part of the Core Strategy planning period.
- 5.7 The implications of growth substantially above a minimum of 7,900 houses has not been tested and will require significant evidence base updates. The SA suggests a precautionary approach should be taken, that SCDC cannot plan to meet its objectively assessed housing need until there is full evidence and assessment in place in order to protect sites under the Birds and habitats Directives, AONB or Heritage Coast. (Paragraph 14 of NPPF). There is already a recognised sensitivity of the area in the proposed plan, in modified policy SP20. The most environmentally sustainable way forward at this point would be to seek adoption of the Core Strategy and Main Modifications with its policy for early review to allow time for assessment with neighbouring authorities of revised housing figures, and the associated strategic infrastructure needs and environmental management.

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
DM	Development management
EU	European Union
JSA	Job Seeker Allowance
LDF	Local Development Framework
mSv	millisieverts, a measure of dose
NPPF	National Planning Policy Framework
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

REFERENCES

Appropriate Assessment of Suffolk Coastal District Council Core Strategy and Development Management Policies (The Landscape Partnership August 2011)

National Planning Policy Framework (Communities and Local Government, March 2012)

Pre-submission Core Strategy and Development management policies (Suffolk Coastal District Council, December 2011)

Scoping of Suffolk Coastal Local Plans and Strategies (Suffolk Coastal District Council, April 2011)

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

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

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

Suffolk Coastal Local Development Framework Core Strategy and Development management policies Cabinet paper 46-09 (Suffolk Coastal District Council, July 2009)

Sustainability Appraisal of Core Strategy and Development Policies (Preferred Options) (Suffolk County Council, December 2007)

Sustainability Appraisal of Core Strategy and Development Control Policies (Preferred Options) (Suffolk County Council, December 2008)

Sustainability Appraisal of Core Strategy and Development Management Policies (Preferred Options) (Suffolk County Council, September 2009)

Sustainability Appraisal of Core Strategy and Development Management Policies (Suffolk County Council June 2010)

Sustainability Appraisal of Core Strategy and Development Management Policies (Suffolk County Council, December 2011)

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

APPENDIX A:

SA implications for Main Modifications

The table shows the considered SA implications resulting from the Main Modifications as proposed to the Suffolk Coastal Core Strategy & Development Management Policies document (which can be found on the Suffolk Coastal District Council website).

Ref	Page	Policy/ Para -graph	Implications for SA
MM1	24	Policy SP1	New sheet SP1 SA11 reduced to + due to omission of priority to agricultural land. No mitigation required.
MM2	24	New Model Policy	New sheet SP1A adds strong positives to SA20 and SA 23.
MM3	24 - 27	Paragraphs 3.19 – 3.35	Considered with SP2 No change to SA.
MM4	27	Policy SP2	New sheet for SP2. No change to SA.
MM5	28	Table 3.2	Covered in new sheet for SP2 and Part B. No change to SA.
MM6	29	Table 3.3	Covered in new sheet for SP2 and Part B. No change to SA.
MM7	33	Paragraphs 3.56 - 3.61	Covered with SP4. Change to SA.
MM8	33	Policy SP4	New sheet SP4 Change to SP19 + No mitigation required.
MM9	38	Policy SP8	New sheet SP8 Change to SA for SA 14 which becomes – and SA 17 becomes 0/+ so less positive. No mitigation required as fulfilled by DM 20 and DM 23.
MM10	39	Paragraph 3.92	Assessed with SP9 see below changes to SA.
MM11	40	Policy SP9	New sheet for SP9. Changes to SA: SA 9 and 14 now 0/- and SA23 ? Mitigation suggested in the form of a rewrite of the policy to clarify the sequential approach and potential role of out of town centres in the Suffolk Coastal context.
MM12	42	Paragraph 3.107	Factual updating. No change to SA.
MM13	44	Policy SP11	Updating. New sheet for SP11 but no change to SA.
MM14	45	Paragraphs 3.121 - 3.123	Factual updateings. No change to SA.
MM15	46	Policy SP13	Minor wording changes and updating. New sheet for SP13 but no change to SA.
MM16	54	Policy SP17	Wording addition. Updated sheet for

Ref	Page	Policy/ Para -graph	Implications for SA
			SP17 but no change to SA.
MM17	55	Policy SP18	Update to wording. Updated sheet for SP18 but no change to SA.
MM18	59	Policy SP19	Updated wording and change in distribution of housing through the settlement hierarchy. Updated sheet for SP19. Changes to SA: SP 2 now 0, SA 4 0/+ and SA 18 + . No mitigation required.
MM19	64	Paragraph 4.09	Updating removes reference to RSS. No change to SA.
MM20	64	4.11	Factual addition. No change to SA.
MM21	64	Paragraph 4.13	Factual addition. No change to SA.
MM22	68	SP20	Sheet updated. SA2 and SA10 changed to +; Sa 13, 14 and 15 changed to 0/-; and SA 17 to +.
MM23	72	SP21	Sheet updated. SA9 changed to +/-; SA10 added +; SA14 changed to -; SA21 added +.
MM24	74	Policy SP22	Sheet updated. No changes to SA.
MM25	76	Paragraph 4.65	Updating of text. No change to SA.
MM26	76	Policy SP24	Sheet updated. SA changed. SA5 added + SA11 added +/- SA17 deleted -
MM27	77	Policy SP25	Sheet updated. SA changed. SA 2 changed from – to +
MM28	78-79	Policy SP26	Sheet updated. SA changed. SA2 added + SA7 added + so now ++
MM29	80	Policy SP27	Sheet updated. No Change to SA.
MM30	82	Policy SP29	Sheet updated. Change to SA. SA3, SA6 added + SA7 added + SA11 and 13 added – SA17 added ? SA19 changed from + to 0/- SA20 added ++ SA23 added +
MM31	87	Paragraphs 5.11 and 5.12	Factual change. Sheets for DM1 & 2 checked but no change to SA.
MM32	88	DM3	Sheet updated. Change to SA. SA 13 added – SA17 added ?
MM33	90	Policy DM6	Sheet checked. No change to SA
MM34	92	Paragraphs 5.27 - 5.28	Updating, providing context to DM9. No change to SA.
MM35	92	DM9	Sheet updated.

Ref	Page	Policy/ Para -graph	Implications for SA
			No change to SA.
MM36	93	DM10	Sheet updated. No change to SA.
MM37	94	DM12	Sheet updated. No change to SA.
MM38	95	Paragraph 5.35 and DM13	Sheet updated. No change to SA.
MM39	97	DM16	Sheet updated. No change to SA.
MM40	98	DM17	Sheet updated. No change to SA.
MM41	99	DM18	Sheet updated. No change to SA.
MM42	101	DM21	Sheet updated. No change to SA.
MM43	102	DM22	Sheet updated. No change to SA.
MM44	103	DM23	Sheet updated. No change to SA.
MM45	104	DM24	Sheet updated. SA changed. SA23 added +
MM46	105	DM25	Sheet updated. No change to SA.
MM47	106	DM27	Sheet updated. No change to SA.
MM48	108	DM29	Sheet updated. SA changed SA18 and SA19 reduced from ++ to +
MM49	109	DM30	Sheet checked. No change to SA.
MM50	111	DM32	Sheet updated. No change to SA.
MM51	111	DM33	Sheet checked. No change to SA.
MM52	117	Paragraph 6.34	Additional information No change to SA.
MM53	144	APPENDIX C	Updated information No change to SA
MM54	147	New Appendix	Additional information Impact on SA noted in text.

APPENDIX B: Strategic Policies (SP) Sustainability Appraisal Tables

Policy:	SP1 – Sustainable Development		Updated
Policy summary:	Sets out 12 criteria for sustainable development		
SA objective:	Impact:	Comments / Mitigation:	
1. To improve the health of the population overall			
2. To maintain and improve levels of education and skills in the population overall	+	Enhances accessibility to services	
3. To reduce crime and anti-social activity			
4. To reduce poverty and social exclusion	++	Aims to create and promote inclusive communities	
5. To improve access to key services for all sectors of the population	++	Aims to enhance accessibility to services and create integrated and sustainable transport system	
6. To offer everybody the opportunity for rewarding and satisfying employment	+	Aims for a healthy economy, balance of employment opportunities	
7. To meet the housing requirements of the whole community	+	Achieve local balance between housing growth and employment opportunities	
8. To improve the quality of where people live and to encourage community participation	+	Maintain and enhance a sense of place/the built environment; promote inclusive communities	
9. To maintain and where possible improve air quality	+	Aims to reduce need to travel, promote sustainable travel. Addressees energy efficiency of buildings	
10. To maintain and where possible improve water quality	+	Development will be supported by the provision of appropriate infrastructure	
11. To conserve soil resources and quality	+	Prioritises reuse of previously developed land and buildings in and around built up areas but no longer includes “where appropriate former agricultural complexes”. Could lead to derelict sites in the open countryside	
12. To use water and mineral resources efficiently, and re-use and recycle where possible	++	Addresses water related sustainability of buildings and method of construction	
13. To reduce waste			
14. To reduce the effects of traffic on the environment	++	Aims to reduce need to travel, promote sustainable travel, integrated transport etc	
15. To reduce emissions of greenhouse gasses from energy consumption	+	Aims to reduce overall need to travel, re-use previously developed land etc, thus reducing greenhouse gas emissions	
16. To reduce vulnerability to flooding	+	Aims to mitigate and adapt to the effects of climate change which could include flooding	
17. To conserve and enhance biodiversity and geodiversity	++	Aims to conserve and enhance the natural environment. And recognises the need to balance employment opportunities, housing growth and environmental capacity.	
18. To conserve and where appropriate enhance areas of historical and archaeological importance	++	Aims to conserve and enhance the built environment and recognises the need to balance employment opportunities, housing growth and environmental capacity.	
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	++	Take advantage of regeneration, provide appropriate infrastructure for communities, promote inclusive communities, conserve and enhance the built environment and a sense of place	
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	++	Aims to enable a healthy economy, relate development to employment, enhance accessibility to services, re-use of previously developed land and buildings	
21. To revitalise town centres	+	Aims to enable a healthy economy, notably in town centres, re-use	

		previously developed areas
22. To encourage efficient patterns of movement in support of economic growth	++	New housing development to be related to employment, transport and infrastructure; integrated and sustainable transport system, reduce overall need to travel
23. To encourage and accommodate both indigenous and inward investment	+	Aims for improved employment opportunities; regeneration opportunities
Assessment Summary	In a world that is increasingly conscious of the need to manage resources very carefully and to address the issue of climate change, spatial planning has a responsibility to ensure that development takes place within a sustainable framework addressing both the threats and opportunities that this brings. The criteria clearly suggest that this is a policy on sustainability that is consistent with nationally policy PPS1 and what was regional policy SS1 whilst retaining a local perspective. The revised wording prioritising reuse of previously developed land in and around built up areas reinforces the choice of sustainable locations for development	
Secondary, Cumulative or synergistic effects:	Whilst crime is not directly addressed within the policy, economic growth should help alleviate crime and anti social behaviour. Reducing emissions and developing sustainability should also help improve health as a secondary impact.	
Short/medium/long term effects:	Long term impact will reduced development on areas susceptible to the effects of climate change (i.e. coastal and river flood plain areas)	
Mitigation proposals summary:	None identified as DM13 and DM14 still allows appropriate development of former agricultural complexes.	

Policy:	SP1A – Presumption in favour of Sustainable Development New	
Policy summary:	Presumption in favour of sustainable development contained in the National Planning Policy Framework	
SA objective:	Impact:	Comments / Mitigation:
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	++	Seeks to find solutions to enable development to go ahead that improves the economic, social and environmental conditions in the 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	++	A speedy approval system will encourage investment.
Assessment Summary	The NPPF has already been subject to SA so there is no need to assess its content again in this framework. The focus in the above appraisal is on the implications of the addition per sec to SP1. The policy is largely positive in its impact as it emphasises finding solutions so proposals can be approved and without delay if they accord with policies in this plan or if adverse impacts do not outweigh the benefits when assessed against the policies in the NPPF.	
Secondary, Cumulative or synergistic effects:	Secondary effect is that speedy decision making may encourage inward investment into Suffolk Coastal.	
Short/medium/long term effects:	Speedy decision making will improve the economic attractiveness of the area.	
Mitigation proposals summary:	Monitoring of development types to ensure early identification of innovative development that could benefit from strategic planning that could be provided in Supplementary Planning Guidance.	

Policy:	SP2 –Housing numbers	Updated
Policy summary:	Provision of at least 7,900 homes across the district in the period 2010-2027, phased to give continuous supply and linked with infrastructure and agreed mitigation for nature conservation issues. Early review of the strategy 2015.	
SA objective:	Impact:	Comments / Mitigation:
1. To improve the health of the population overall	+	Minimise need for motor vehicles, upgrade foot and cycle paths for access to employment, schools etc, maximise access to green space
2. To maintain and improve levels of education and skills in the population overall	+	Appropriate infrastructure will be provided, may include schools
3. To reduce crime and anti-social activity		
4. To reduce poverty and social exclusion	+	Sustainable mix of housing types may include some affordable housing
5. To improve access to key services for all sectors of the population	++	Allocations reflect access to services and encourages provision of infrastructure

6. To offer everybody the opportunity for rewarding and satisfying employment	+	Link to existing and proposed employment, improve access to such areas
7. To meet the housing requirements of the whole community	++	Provides for appropriate scale of housing need for the district given recent trends. The modified policy allows additional housing which will be from windfall and hence dispersed throughout the district.
8. To improve the quality of where people live and to encourage community participation	+	Requires associated new and improved infrastructure (deemed to cover doctors, recreational space, allotments, schools, meeting/community spaces)
9. To maintain and where possible improve air quality	-	More housing will result in increased traffic and household air pollution
10. To maintain and where possible improve water quality	+	Development will be supported by the provision of appropriate infrastructure which is important because there is likely to be extra effluent into the estuaries.
11. To conserve soil resources and quality	-	Likely to use Greenfield sites
12. To use water and mineral resources efficiently, and re-use and recycle where possible		
13. To reduce waste	-	More housing will result in increased waste
14. To reduce the effects of traffic on the environment	-	More housing will result in increased traffic
15. To reduce emissions of greenhouse gasses from energy consumption	-	More housing will increase energy consumption
16. To reduce vulnerability to flooding	+	New development, although potentially increasing runoff, would be designed to sustainable standards including taking measures to reduce vulnerability to flooding, e.g. SUDS.
17. To conserve and enhance biodiversity and geodiversity	-	Biodiversity could be negatively affected by housing increases, however environmental constraints noted. Use of small brownfield sites may also impact upon biodiversity and this pressure is increased through the policy modification that envisages a higher level of housing provided by windfall sites. Areas screened as important for nature conservation will have housing phased to accord with agreed mitigation.
18. To conserve and where appropriate enhance areas of historical and archaeological importance	-	Archaeological sites may be damaged, particularly in the Ipswich Policy Area, where a large proportion of houses are allocated to be built
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+	Seeks to take account of scale appropriate to community
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Phased new housing to link to existing and proposed employment
21. To revitalise town centres		
22. To encourage efficient patterns of movement in support of economic growth	++	New housing in settlements to bring people closer to jobs and services
23. To encourage and accommodate both indigenous and inward investment		
Assessment Summary	There are many social and economic positives to be had through linkages with existing core frameworks of employment, service and transport areas which are found in the larger settlements. Consideration and mitigation will need to be given towards minimising the possible identified environmental impacts such as waste production, traffic generation, biodiversity losses, natural resource use etc.	
Secondary, Cumulative or synergistic effects:	Research on recreational impacts on the Sandlings SPA and conclusions in the Appropriate Assessment suggest secondary and cumulative impacts from this level of housing growth plus proposals in the Ipswich area will be a concern for the popular destinations. Concerns cover traffic generation, congestion in villages (e.g. Waldringfield), demand for boat ownership and sailing club membership in the East	

	Ipswich area.
Short/medium/long term effects:	Housing construction will use short term mineral resources and potential disruption of nearby communities. In the medium/long term there will be opportunities to develop significant infrastructure improvements may have fruition. Longer term impacts on disturbance to Nighthjars in the Sandlings SPA and wintering birds in the Deben estuary are concerns.
Mitigation proposals summary:	Development should minimise the environmental resources used in construction and seek to use sustainable construction techniques. Where development is to take place away from major areas, the broad locations should be sought sequentially through larger communities so that isolated development does not occur. The Appropriate Assessment recommends 1km separation of strategic housing allocations from European sites and provision of a country park in the north Ipswich area. The need to reduce demand for visits by providing local greenspace especially for dog walking plus management of popular destinations in SPAs to minimise disturbance to birds will be required. Local/cumulative concerns about traffic, congestion at popular recreation destinations and demand for sailing club membership in the East Ipswich Area need to be addressed in the preparation of the Martlesham Area Action Plan. . Air quality monitoring will be needed on the main transport routes into Ipswich. Monitoring of the impacts on the numbers of Nightjars in the Sandlings SPA and wintering birds in the Deben Estuary SPA will be required. The modified policy includes reference to mitigation for areas screened for nature conservation issues and the need for appropriate phasing of development. Mitigation for the dispersed windfall will be handled on a site by site basis and by DM27.

Policy:	SP2 –Housing numbers		Updated
Policy summary:	Provision of at least 7,900 homes across the district in the period 2010-2027, with an early review of the strategy 2015.		
SA objective:	Impact:	Comments / Mitigation:	
1. To improve the health of the population overall	+	Minimise need for motor vehicles, upgrade foot and cycle paths for access to employment, schools etc, maximise access to green space	
2. To maintain and improve levels of education and skills in the population overall	+	Appropriate infrastructure will be provided, may include schools	
3. To reduce crime and anti-social activity			
4. To reduce poverty and social exclusion	+	A mix of housing types including affordable will be beneficial for some communities whilst small scale development in rural areas will help reduce social exclusion of existing residents.	
5. To improve access to key services for all sectors of the population	++	The housing distribution strategy reflects access to services and encourages provision of infrastructure.	
6. To offer everybody the opportunity for rewarding and satisfying employment	+	Link to existing and proposed employment, improve access to such areas	
7. To meet the housing requirements of the whole community	++	Provides for appropriate scale of housing need for the district given recent trends. The modified policy allows additional housing which will be from windfall and hence dispersed throughout the district and any unmet need from the objectively assessed housing requirement will be addressed by the early review of the plan in 2015.	
8. To improve the quality of where people live and to encourage community participation	+	Requires associated new and improved infrastructure (deemed to cover doctors, recreational space, allotments, schools, meeting/community spaces)	

9. To maintain and where possible improve air quality	-	More housing will result in increased traffic and household air pollution, with particular concerns on the routes into Ipswich.
10. To maintain and where possible improve water quality	+	Development will be supported by the provision of appropriate infrastructure which is important because there is likely to be extra effluent into the estuaries.
11. To conserve soil resources and quality	-	Likely to use greenfield sites
12. To use water and mineral resources efficiently, and re-use and recycle where possible	0	Previous water resource management plans based on regional studies and population projections already identify strategic needs
13. To reduce waste	+/-	More housing will result in increased waste but possibly improved management.
14. To reduce the effects of traffic on the environment	-	More housing will result in increased traffic
15. To reduce emissions of greenhouse gases from energy consumption	-	More housing will increase energy consumption
16. To reduce vulnerability to flooding	+	New development, although potentially increasing runoff, would be designed to sustainable standards including taking measures to reduce vulnerability to flooding, e.g. SUDS.
17. To conserve and enhance biodiversity and geodiversity	-	Biodiversity could be negatively affected by housing increases, however environmental constraints noted. Use of small brownfield sites may also impact upon biodiversity and this pressure is increased through the policy modification that envisages a higher level of housing provided by windfall sites. Areas screened as important for nature conservation will have housing phased to accord with agreed mitigation.
18. To conserve and where appropriate enhance areas of historical and archaeological importance	-	Archaeological sites may be damaged, particularly in the Ipswich Policy Area, where a large proportion of houses are allocated to be built
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+	Seeks to take account of scale appropriate to community
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Phased new housing to link to existing and proposed employment
21. To revitalise town centres		
22. To encourage efficient patterns of movement in support of economic growth	++	New housing in settlements to bring people closer to jobs and services
23. To encourage and accommodate both indigenous and inward investment	+	Development will encourage business to locate in the district and infrastructure providers to invest in upgrades.
Assessment Summary	There are many social and economic positives to be had through linkages with existing structures of employment, service and transport areas which are found in the larger settlements. Consideration and mitigation will need to be given towards minimising the possible identified environmental impacts such as waste production, traffic generation, biodiversity losses, natural resource use etc.	

Secondary, Cumulative or synergistic effects:	Research on recreational impacts on the Sandlings SPA and conclusions in the Appropriate Assessment suggest secondary and cumulative impacts from this level of housing growth plus proposals in the Ipswich area will be a concern for the popular destinations. Concerns cover dog walking, visitor frequency, traffic generation, congestion in villages (e.g. Waldringfield), demand for boat ownership and sailing club membership in the East Ipswich area.
Short/medium/long term effects:	Housing construction will use short term mineral resources and potential disruption of nearby communities. In the medium/long term there will be opportunities to develop significant infrastructure improvements. Longer term impacts on disturbance to Nightjars in the Sandlings SPA and wintering birds in the Deben estuary SPA are concerns.
Mitigation proposals summary:	Development should minimise the environmental resources used in construction and seek to use sustainable construction techniques. Where development is to take place away from major areas, the broad locations should be sought sequentially through larger communities so that isolated development does not occur. The Appropriate Assessment recommends 1km separation of strategic housing allocations from European sites and provision of a country park. The need to reduce demand for visits by providing local greenspace especially for dog walking plus management of popular destinations in SPAs to minimise disturbance to birds will be required. Local/cumulative concerns about traffic, congestion at popular recreation destinations and demand for sailing club membership in the East Ipswich Area need to be addressed in the preparation of more detailed planning documents such as the Martlesham Area Action Plan. Air quality monitoring will be needed on the main transport routes into Ipswich. Monitoring of the impacts on the numbers of Nightjars in the Sandlings SPA and wintering birds in the Deben Estuary SPA will be required to ensure the mitigation measures are adequate. The modified policy includes reference to mitigation for areas screened for nature conservation issues and the need for appropriate phasing of development. There is a degree of uncertainty over the level of mitigation which may be required for housing numbers significantly higher than 7,900, and fresh assessments may need to be considered. However, mitigation for the dispersed windfall will be handled on a site by site basis and by DM27.

Policy:	SP4 – Gypsies, travellers and travelling showpersons Updated		
Policy summary:	Gypsies and travellers have specific housing needs that the District Council is required to address: 31 residential pitches and 10 transit sites. Future needs will be monitored by a bi-annual survey. Sites will be identified in a Single Issue Site Allocations Development Plan Document unless earlier provision is secured by planning applications.		
SA objective:	Impact:	Comments / Mitigation:	
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	+	Intends to maintain discussions with parish councils affected by illegal encampments or unauthorised developments.	
4. To reduce poverty and social exclusion	+	Aims to liaise directly with “new traveller” groups. “New travellers” are defined as a particular group in paragraph 3.57 and have the majority of the need. Supporting text to the policy says that for the small number of gypsies identified in the Suffolk Cross Boundary Gypsy and Traveller Accommodation Assessment it is expected that individual households will approach the Council direct with regard to meeting their needs so dialogue with gypsies will equally take place.	

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	+	Seeks to achieve accommodation for travellers and regularly update on their needs.
8. To improve the quality of where people live and to encourage community participation	+	Aims to liaise directly with "new traveller" groups on their needs and how they might be met and also to maintain discussions with local parish councils currently affected by illegal/unauthorised encampments or developments. In rural and semi rural settings will aim to ensure the scale of sites do not dominate the nearest settled community.
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	+	May relieve pressure on biodiversity rich land
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	+	In assessing the suitability of sites in rural or semi-rural areas will ensure the scale of sites do not dominate the nearest settled community.
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		
Assessment Summary	A largely sustainable strategy that aims to provide for the specific needs of gypsies and travellers.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	None required.	

Policy:	SP5 – Employment Land		No change
Policy summary:	Identifies strategic employment areas		
SA objective:	Impact:	Comments / Mitigation:	
1. To improve the health of the population overall			
2. To maintain and improve levels of education and skills in the population overall	+	Allocating employment land may result in increase jobs and influence skills levels positively.	
3. To reduce crime and anti-social activity			
4. To reduce poverty and social exclusion	+	Allocating employment land could lead to job creation	
5. To improve access to key services for all sectors of the population			
6. To offer everybody the opportunity for rewarding and satisfying employment	++	Aims to provide for 8,000 new jobs although may limit economic development in the countryside	
7. To meet the housing requirements of the whole community	0/-	Allocating employment land could decrease land available for housing	
8. To improve the quality of where people live and to encourage community participation			
9. To maintain and where possible improve air quality	0/-	Employment land can sometimes cause air quality concerns	
10. To maintain and where possible improve water quality	-	Employment development may result in more demand on sewage facilities putting pressure on existing infrastructure that is close to capacity in some places.	
11. To conserve soil resources and quality	-	Some of the strategic allocations are Greenfield land.	
12. To use water and mineral resources efficiently, and re-use and recycle where possible			
13. To reduce waste	0/-	More development will mean more waste	
14. To reduce the effects of traffic on the environment	0/-	Employment corridor stretching into Ipswich borough could increase pressure on roads.	
15. To reduce emissions of greenhouse gasses from energy consumption	0/-	Development will increase energy use	
16. To reduce vulnerability to flooding	+/-	Development of strategic sites in flood risk areas will result in improved flood risk infrastructure or it will not be permitted, and this could benefit a wider area. Elsewhere extensions on existing sites could result in more runoff and hence flood risk. Hence +/- depending on scale of development.	
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	++	May limit economic development in the countryside but will create jobs overall	
21. To revitalise town centres	+	Town centres are recognised as employment areas	
22. To encourage efficient patterns of movement in support of economic growth			

23. To encourage and accommodate both indigenous and inward investment	+	Land allocated for expansion and new development
Assessment Summary	The policy is considered to perform well in meeting economic objectives. Some impacts could have possible negative issues with environmental protection, water and air quality, energy use, as well as waste.	
Secondary, Cumulative or synergistic effects:	Development of Felixstowe Port, Martlesham Heath Business Campus and Ransomes Europark will contribute to traffic flows on the A14 and Orwell Bridge.	
Short/medium/long term effects:	Long term contribution to traffic flows on the A14.	
Mitigation proposals summary:	In order to mitigate against negative environmental impacts, the suite of core strategy and development control policies should ensure that development is undertaken in a sustainable manner in terms of minimising impact. In particular SP10 undertakes to consider options in respect of improving capacity on the A14. Policy wording could be strengthened by adding wording that matches that in SP2 Housing which clarifies that it will be necessary for new development to be timed to any necessary associated new and improved infrastructure provision. However SP1 does already state this so does not necessarily need to be repeated.	

Policy:	SP6 – Regeneration		No change
Policy summary:	Priority locations for economic regeneration.		
SA objective:	Impact:	Comments / Mitigation:	
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	+	Aims to reduce localised social issues	
4. To reduce poverty and social exclusion	+	Aims to reduce localised social deprivation	
5. To improve access to key services for all sectors of the population	+	Aims to reduce localised social deprivation through regeneration.	
6. To offer everybody the opportunity for rewarding and satisfying employment	+	Aims increase the range of jobs on offer in Felixstowe, Leiston, Saxmundham and the rural areas.	
7. To meet the housing requirements of the whole community			
8. To improve the quality of where people live and to encourage community participation	+	Aims to encourage new investment in the area	
9. To maintain and where possible improve air quality	-	Regeneration of areas may cause an increase in traffic	
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	-	Regeneration of areas may cause an increase in traffic	
15. To reduce emissions of greenhouse gasses from energy consumption	-	Regeneration of areas may cause an increase in 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	-	Regeneration proposals in Felixstowe could damage the historic environment in an area considered to be under threat.
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes		
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	++	Aims to regenerate failing rural areas and towns and kickstart prosperity and economic growth
21. To revitalise town centres	++	Town centres targeted for regeneration, following concerns over impact of out-of-town stores and the growth of the Ipswich retail economy
22. To encourage efficient patterns of movement in support of economic growth	++	Economic improvements in previously declining areas may provide employment in the local area for those who were previously forced to travel. More focus on improving employment opportunities in market towns such as Leiston and Saxmundham. Less necessity to commute for employment.
23. To encourage and accommodate both indigenous and inward investment	+	Regeneration of areas may attract investment
Assessment Summary	Generally positive results, the only negative aspects relating to traffic generation and threat to the historic built environment in Felixstowe.	
Secondary, Cumulative or synergistic effects:	Social deprivation generally less pronounced in areas of economic activity.	
Short/medium/long term effects:	Long term rising sea levels at Felixstowe could impact on the location of regeneration activities. Opportunities for regeneration related to the Sizewell C development need to be planned to result in increased sustainable employment	
Mitigation proposals summary:	Traffic generation to be an important consideration when assessing proposals and will be picked up by DM20. Plan lacks a clear policy to prevent damage to the historic environment and should be remedied.	

Policy:	SP7 – Economic Development in the Rural Areas		No change
Policy summary:	Aims to maximise the economic potential of the rural areas at a scale appropriate to the settlement hierarchy, in respect of the environment and sustainability and in support of agriculture and tourism where appropriate.		
SA objective:	Impact:	Comments / Mitigation:	
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	++	Aims to secure employment locally and in rural areas	
5. To improve access to key services for all sectors of the population			

6. To offer everybody the opportunity for rewarding and satisfying employment	++	Aims to maximise economic potential of rural areas and secure employment locally
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	-	Development may add to air pollution
10. To maintain and where possible improve water quality		
11. To conserve soil resources and quality	0/-	Development of rural areas could be on Greenfield sites.
12. To use water and mineral resources efficiently, and re-use and recycle where possible		
13. To reduce waste	0/-	Development may increase waste
14. To reduce the effects of traffic on the environment	0/+	Encouragement for enterprises which are compatible with objectives in respect of 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	0/+	Encouragement for enterprises which are compatible with objectives in respect of the environment
18. To conserve and where appropriate enhance areas of historical and archaeological importance		
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	0/-	Rural diversification can often change character of landscapes (eg. Farm outbuildings developed)
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	++	Aims to maximise economic potential of rural areas and secure employment locally
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	+	Encourages economic development
Assessment Summary	Generally sustainable policy although there are risks associated with air pollution and waste.	
Secondary, Cumulative or synergistic effects:	People are generally healthier and crime is generally lower in economically successful areas, so there is a chance for a positive secondary effect here.	
Short/medium/long term effects:	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.	
Mitigation proposals summary:	The negative impacts of this policy should be mitigated by the implementation of other plan policies.	

Policy:	SP8 – Tourism Updated	
Policy summary:	Encouraging and controlling tourism development appropriately in different types of areas. Modified policy allows small scale new development in unexposed areas of Suffolk Coast and Heaths AONB.	
SA objective:	Impact:	Comments / Mitigation:
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	+	Could result in creation of jobs which will alleviate poverty
5. To improve access to key services for all sectors of the population		
6. To offer everybody the opportunity for rewarding and satisfying employment	+	Tourism-related development will increase local employment opportunities
7. To meet the housing requirements of the whole community		
8. To improve the quality of where people live and to encourage community participation	0/-	Some consideration of capacity to absorb development that acknowledges need to deal with problems created by tourism
9. To maintain and where possible improve air quality	0/-	Increased tourist activity will increase air pollution. Implications for environment considered in some areas. Modification allows new small scale development in Suffolk Coast and Heaths AONB.
10. To maintain and where possible improve water quality	0	Increased tourist activity will increase water pollution, particularly at coastal sites; but policy attempts to relieve pressure on coast
11. To conserve soil resources and quality	0/-	PDL could be used for extensions and tourist developments
12. To use water and mineral resources efficiently, and re-use and recycle where possible		
13. To reduce waste	-	Tourism-related development will increase waste
14. To reduce the effects of traffic on the environment	-	Increased tourism will increase traffic in the area. Even small scale development in the AONB could impact daily life in small communities in the summer. However, green tourism will include use of public transport and will help mitigate slightly.
15. To reduce emissions of greenhouse gasses from energy consumption	0/-	Increased tourism will increase energy consumption and greenhouse gas emissions. Green tourism may help mitigate by reducing travel once visitors have arrived in the district.
16. To reduce vulnerability to flooding	0/-	Tourism facilities and developments will be on flood plain.
17. To conserve and enhance biodiversity and geodiversity	0/+	Tourism related development in/and close to AONB may have some negative impact on biodiversity; but policy attempts to relieve pressure on sensitive coastal areas and biodiversity and habitat assessments are required. However cumulative impact of increased traffic movements area a concern.
18. To conserve and where appropriate enhance areas of historical and archaeological importance	+	Tourism revenue can help with upkeep of historic and archaeological sites
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	++	Protection of settings and the AONB in particular will be of prime importance, landscape assessment included in policy

20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	++	Tourism will contribute to levels of economic growth
21. To revitalise town centres		
22. To encourage efficient patterns of movement in support of economic growth	+	"Green tourism" and use of public transport to be encouraged.
23. To encourage and accommodate both indigenous and inward investment	+	Encouraging tourism will increase investment
Assessment Summary	This policy needs to ensure that negative environmental impacts are avoided by considering the influence of other protective policies when planning tourism development. Benefits to the economy should be experienced, along with associated positive social impacts. Reference to "green tourism" suggests aim for economic benefits of tourism to be achieved without adding pressure on local infrastructure (e.g. road network) Modification allows small scale development in the AONB.	
Secondary, Cumulative or synergistic effects:	Cumulative impact of this policy and SP6 Regeneration should help reverse the fortunes of Felixstowe tourism. Cumulative effect of recreational use of European designation sites by residents and visitors. There will be a cumulative effect from small scale development in the AONB on the number of traffic movements that could impact biodiversity and communities.	
Short/medium/long term effects:		
Mitigation proposals summary:	Biodiversity and habitat assessments should be undertaken fully before any development is implemented, along with ensuring that noise and air pollution will be avoided. Cumulative traffic implications will need to be assessed when individual applications are determined. DM20 Travel Plans and DM 23 residential amenity will mitigate where new development will have significant transport implications.	

Policy:	SP9 – Retail Centres		Updated
Policy summary:	Emphasis on maintaining and enhancing the viability and vitality of existing retail centres in towns and local centres and making proper provision for new forms of retail distribution. The scale of any new floorspace will be set out according to the settlement hierarchy. (Martlesham Retail Park has been removed and in paragraph 3.92 it states further development will be resisted where it will compete with the localities listed in SP9)		
SA objective:	Impact:	Comments / Mitigation:	
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	+	Enhancing retail centres may provide more employment opportunities	
7. To meet the housing requirements of the whole community			
8. To improve the quality of where people live and to encourage community participation			
9. To maintain and where possible improve air quality	0/-	Will intensify traffic movements around existing centres and in towns.	

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	0/-	Will intensify traffic movements around existing centres and in towns.
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	-	Will put pressure on historic towns to accommodate development that is of a scale and modern design that will be out of keeping with the existing townscape.
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Aims to sustain and enhance the vitality and viability of retail centres
21. To revitalise town centres	+	Aims to sustain and enhance the vitality and viability of retail centres, including those in town centres
22. To encourage efficient patterns of movement in support of economic growth		
23. To encourage and accommodate both indigenous and inward investment	?	There is a danger that the sequential test set out in this policy and paragraph 3.92 does not encourage larger scale development and could be lost to neighbouring Districts.(e.g. Next at Home recently completed at Martlesham is on a scale that could not be accommodated in any market town – the physical scale, traffic and parking requirements would dwarf any town in Suffolk Coastal, however it is an employment asset to the District).
Assessment Summary	The policy is generally sustainable but the omission of Martlesham Retail Park and the role it could play in maintaining a flourishing retail environment within Suffolk Coastal has resulted in some concerns for negative impacts relating to concentrating traffic movements in historic towns with narrow roads and pressure on towns to accommodate development that may not be in keeping with their character.	
Secondary, Cumulative or synergistic effects:	Additions to existing centres will have cumulative traffic impacts.	
Short/medium/long term effects:	New development may generate traffic and waste during the short term construction phase.	
Mitigation proposals summary:	Cumulative impacts of traffic movements and implications for parking and the sustainable transport offer will have to be considered at the planning Stage and should be mitigated by DM 12 Expansion and intensification of employment sites and DM19 Parking standards. DM21 Aesthetics will ensure proposals do not come forward that do not relate to the scale and character of surroundings. However it is not clear in the Core Strategy how the sequential test will be applied enabling Martlesham Park and Purdis Farm to be able to provide for large scale development (e.g. Next at Home). The danger is instead of proposals being down scaled to fit the environment in a market town, they will be lost to neighbouring Districts. To mitigate this SP9 and paragraph 3.92 should be combined to clarify the sequential approach and potential role of out of centre retail locations for a limited number of larger scale modern retail developments. Depending on the nature of the development they will not necessarily threaten the viability of town centres but add to	

	the charm of town centres for a different shopping experience.
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Policy:	SP10 – A14 and A12		No change
Policy summary:	Notes the importance of the A14 as a European route from Felixstowe, with capacity issues around Ipswich. Notes the role of the A12 for supporting Sizewell and the requirement for improvements south of A1214 in conjunction with housing and employment development.		
SA objective:	Impact:	Comments / Mitigation:	
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	+	Better access to local services due to reduced journey times through reduced congestion	
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	+	Will provide better links to jobs, services and leisure facilities. Respects quality of life for people living adjacent to the A12 north of Woodbridge.	
9. To maintain and where possible improve air quality	-	Additional roads may encourage increased use of private cars and subsequently increase pollution	
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	- -	Improved roads may encourage increased use of private cars. Improvements around Ipswich and on A12 will increase capacity.	
15. To reduce emissions of greenhouse gasses from energy consumption	-	Improved roads may encourage increased use of private cars and subsequently increase pollution.	
16. To reduce vulnerability to flooding	?	Planned works to A12 at Blythburgh to counteract flooding problems not mentioned	
17. To conserve and enhance biodiversity and geodiversity	-	Road improvements will impact negatively on biodiversity	
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	+	Considers solutions for Little Glemham area where A12 cuts through villages (including potential bypass)	

20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Looks to improve journey times, good for local business and Port activities.
21. To revitalise town centres		
22. To encourage efficient patterns of movement in support of economic growth	+	Will provide better access to jobs, services, though may be mainly through private car usage
23. To encourage and accommodate both indigenous and inward investment	+	Improved road network may attract investment to the area
Assessment Summary	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.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:	Short term disruption from road modifications. Longer term increased capacity of road network.	
Mitigation proposals summary:	Negative impacts associated with this policy are related to the potential for increased traffic from proposed increasing road capacity. This can be mitigated against through the promotion of sustainable transport, walking and cycling and limiting car parking / ownership. This is mentioned in policy SP11.	

Policy:	SP11 – Accessibility		Updated
Policy summary:	Aims to maximise opportunities for local journeys to be made by means other than the private motor car. Improve both quality and quantity of public transport provision and encourage transfer of freight from road to rail. Modification updates the policy to include reference to CIL.		
SA objective:	Impact:	Comments / Mitigation:	
1. To improve the health of the population overall	+	Promotes improved foot and cycle provision to local facilities thereby encouraging physical exercise	
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	+	Improved bus services could increase access to employment and other services	
5. To improve access to key services for all sectors of the population	++	Bus and rail services, cycling and foot travel access to key services to be improved	
6. To offer everybody the opportunity for rewarding and satisfying employment	+	Improved bus and rail services will provide greater access to employment opportunities available	
7. To meet the housing requirements of the whole community			
8. To improve the quality of where people live and to encourage community participation	0/+	Promotes switching to more sustainable modes of transport to reduce traffic on local roads	
9. To maintain and where possible improve air quality	+	Net reduction in traffic pollution possible due to improved public transport, by reducing local transport by private car and transferring more freight from road to rail	
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	+	Net reduction in traffic possible due to improved public transport, by reducing local transport by private car and transferring more freight from road to rail
15. To reduce emissions of greenhouse gasses from energy consumption	+	Net reduction in emissions from traffic possible due to improved public transport, by reducing local transport by private car and transferring more freight from road to rail
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	+	Seeks to manage traffic through Improved public transport provision, resulting in fewer private car journeys and transferring more freight from road to rail
23. To encourage and accommodate both indigenous and inward investment	+	Improved accessibility will provide scope for further investment/relocation of businesses to the area
Assessment Summary	Reducing the impact of traffic on the environment and giving the community easy access to essential services are key messages emerging from this policy. Making walking and cycling more feasible could improve the health of the population. No negative aspects have been recorded. However, it is noted that the emphasis is on changing transport habits among local people with little attention to changing business movements.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	None needed. Modification is an update to include reference to the Community Infrastructure levy as a means to securing improved transport services and facilities.	

Policy:	SP12 – Climate Change		No change
Policy summary:	Aims to contribute towards the mitigation of the effects of new development on climate change by minimising the use of natural resources and production of waste, using recycled materials where appropriate, promoting renewable energy schemes, minimising risk of flooding and improving coastal management.		
SA objective:	Impact:	Comments / Mitigation:	
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	++	Aims to minimise impacts on air quality
10. To maintain and where possible improve water quality	++	Aims to minimise impacts on water quality
11. To conserve soil resources and quality	+	Aims to minimise impacts on soil quality
12. To use water and mineral resources efficiently, and re-use and recycle where possible	++	Aims to minimise use of natural resources and utilise recycled materials
13. To reduce waste	++	Aims to reduce waste
14. To reduce the effects of traffic on the environment		
15. To reduce emissions of greenhouse gasses from energy consumption	++	Aims to minimise greenhouse gas emissions
16. To reduce vulnerability to flooding	++	Aims to minimise the risk of flooding
17. To conserve and enhance biodiversity and geodiversity	+	Aims to improve estuary and coastal management, minimise pollution etc
18. To conserve and where appropriate enhance areas of historical and archaeological importance		
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes		
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Aims to provide a more sustainable base for economic growth
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		
Assessment Summary	Highly sustainable although the policy wording mentions mitigation to climate change when it does in fact also refer to adaptation.	
Secondary, Cumulative or synergistic effects:		

Short/medium/long term effects:	Will contribute to the longer term reduction in Co2 emissions.
Mitigation proposals summary:	None required but the addition of the word adaptation would build on SP1.

Policy:	SP13 – Nuclear Energy Updated	
Policy summary:	Addresses the local issues in respect of the possibility of additional nuclear power stations at Sizewell.	
SA objective:	Impact:	Comments / Mitigation:
1. To improve the health of the population overall	-	Potential threat to health in the event of problem or anxiety
2. To maintain and improve levels of education and skills in the population overall		
3. To reduce crime and anti-social activity	+	Will address social issues associated with housing construction workers in area
4. To reduce poverty and social exclusion	++	Considers economic impact and aims to ensure that the benefits are enjoyed by local communities
5. To improve access to key services for all sectors of the population		
6. To offer everybody the opportunity for rewarding and satisfying employment	++	Considers economic impact and aims to ensure that the benefits are enjoyed by local communities
7. To meet the housing requirements of the whole community	++	Considers housing need, both during construction and in the long-term
8. To improve the quality of where people live and to encourage community participation	+	Considers community impact
9. To maintain and where possible improve air quality	++	Takes into account ecological impacts and aims to consider appropriate road, rail and sea transport and residential amenity
10. To maintain and where possible improve water quality	+/-	Water quality will be maintained as the policy takes into account ecological impacts however development will put additional pressure on Leiston sewage works beyond its volumetric limit.
11. To conserve soil resources and quality	-	Likely to use Greenfield land
12. To use water and mineral resources efficiently, and re-use and recycle where possible	+	Aims for sustainable procurement in construction
13. To reduce waste	--	On site storage of nuclear waste
14. To reduce the effects of traffic on the environment	+	Aims to consider rail/sea transport
15. To reduce emissions of greenhouse gasses from energy consumption		
16. To reduce vulnerability to flooding	+	Takes into account coastal erosion
17. To conserve and enhance biodiversity and geodiversity	+	Takes into account ecological impacts
18. To conserve and where appropriate enhance areas of historical and archaeological importance		
19. To conserve and enhance the quality and local distinctiveness of	+	Takes into account landscape issues

landscapes and townscapes		
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	++	Considers economic impact and aims to ensure that the benefits are enjoyed by local communities
21. To revitalise town centres		
22. To encourage efficient patterns of movement in support of economic growth	+	Aims to consider rail/sea transport
23. To encourage and accommodate both indigenous and inward investment	+	Centre of Excellence status would raise the profile of Suffolk Coastal and could encourage inward investment
Assessment Summary	High level of overall sustainability. Minor modifications have not altered the assessment of sustainability.	
Secondary, Cumulative or synergistic effects:	Cumulative water resource and disposal needs generated by Sizewell C and new housing development will need to be considered.	
Short/medium/long term effects:	Long term storage of nuclear waste and radioactivity risk. Short term use of Greenfield land for construction phase.	
Mitigation proposals summary:	Need to ensure appropriate infrastructure is in place. This should be achieved by the implementation of SP1 in parallel with this policy.	

Policy:	SP14 – Biodiversity and Geodiversity		No change
Policy summary:	Aims to protect and enhance biodiversity and geodiversity through various measures in conjunction with the Suffolk Biodiversity Action Plan and the Suffolk Local Geodiversity Action Plan.		
SA objective:	Impact:	Comments / Mitigation:	
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	+	Creation of habitat and implementation of BAP will increase tourism/offer employment opportunities	
7. To meet the housing requirements of the whole community			
8. To improve the quality of where people live and to encourage community participation	+	Protects environmental assets for the enjoyment of local communities and offers healthy volunteering opportunities.	
9. To maintain and where possible improve air quality			
10. To maintain and where possible improve water quality	++	Rivers, estuaries and coasts to be protected and enhanced	
11. To conserve soil resources and quality	+	Conservation of habitat will benefit soil 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	++	Principal aim of the policy
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	++	Policy aims to protect landscapes. Particular types of bio and geo diversity can be linked to landscapes.
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Biodiversity site protection may increase tourism, provide jobs
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		
Assessment Summary	Very sustainable policy and offers the local community valuable opportunities for volunteering with associated health impacts.	
Secondary, Cumulative or synergistic effects:	Long term benefits for tourism and health of local communities that help maintain or use the green spaces with associated environmental assets.	
Short/medium/long term effects:	Long term conservation of sites of national and international importance.	
Mitigation proposals summary:	None necessary as no negative impacts forecast.	

Policy:	SP15 – Landscape and Townscape	No change
Policy summary:	Aims to protect and enhance the various landscape character areas within the district either through opportunities linked to development or through other strategies.	
SA objective:	Impact:	Comments / Mitigation:
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	+/-	Protecting and enhancing local landscape and townscape, promoting their distinctiveness could increase tourism, but could prevent some economic development
7. To meet the housing requirements of the whole community		
8. To improve the quality of where people live and to encourage community participation	+	Aims to protect and enhance local landscapes and prevent coalescence
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	+	May prevent greenfield land being developed
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	+	Protecting and enhancing landscapes could have positive benefits for biodiversity
18. To conserve and where appropriate enhance areas of historical and archaeological importance	++	Seeks to preserve areas of historical importance
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	++	Aims to protect and enhance AONB and local landscapes, promote their distinctiveness and prevent coalescence
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+/-	Protecting and enhancing local landscapes and promoting their distinctiveness could increase tourism, but could prevent economic development
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		
Assessment Summary	Seeks to protect important assets that will benefit tourism. May limit the opportunities presented though change, where this be through development or land management i.e. lack of options to enhance or diversify where compatible in order to achieve social or economic objectives. No specific reference to archaeology in the policy but it is made clear in the supporting text that in relation to the built environment, the designation of conservation areas, scheduled ancient monuments, historic parklands and the listing of buildings are all issues that can be addressed outside the Local Development Framework through the NPPF. Decisions on development proposals affecting heritage assets will also be informed by Conservation Area Appraisal, archaeological assessments and information from the historic environment record.	
Secondary, Cumulative or synergistic effects:	Secondary benefits to health accrue from the enjoyment of distinctive landscapes.	
Short/medium/long term effects:	Long term impact is to conserve the landscape and townscape assets underpinning tourism and a range of jobs.	

Mitigation proposals summary:	None specifically required. Policy needs to be applied in conjunction with others, particular in respect of economic and rural regeneration.
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Policy:	SP16 – Sport and Play		No change
Policy summary:	The appropriate provision, protection and enhancement of formal and informal sport and recreation facilities for all sectors of the community will be supported, particularly where shortfalls in local provisions can be addressed and it accords with local requirements.		
SA objective:	Impact:	Comments / Mitigation:	
1. To improve the health of the population overall	++	Aims to provide sport and play space	
2. To maintain and improve levels of education and skills in the population overall			
3. To reduce crime and anti-social activity	+	Provision of activities could reduce anti-social activities	
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	++	Aims to provide, protect and enhance formal and informal sport and play space	
9. To maintain and where possible improve air quality	+	Local facilities will reduce the need to travel	
10. To maintain and where possible improve water quality			
11. To conserve soil resources and quality			
12. To use water and mineral resources efficiently, and re-use and recycle where possible			
13. To reduce waste			
14. To reduce the effects of traffic on the environment	+	Local facilities will reduce the need to travel	
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	+	Local facilities will reduce the need to travel
23. To encourage and accommodate both indigenous and inward investment		
Assessment Summary	Provision, protection and enhancement of formal and informal facilities is a sustainable policy with focus on health of the population.	
Secondary, Cumulative or synergistic effects:	Provision of sport and play facilities provides volunteering and leadership opportunities	
Short/medium/long term effects:	Long term health benefits to the local population.	
Mitigation proposals summary:	None required	

Policy:	SP17 – Green Space		Updated
Policy summary:	The Council will seek to ensure that communities have well-managed access to green space within settlements and in the countryside and coastal areas, in order to benefit health, community cohesion and greater understanding of the environment, without detriment to wildlife and landscape character. Modification adds that developer contributions will be secured by conditions, legal agreement or CIL.		
SA objective:	Impact:	Comments / Mitigation:	
1. To improve the health of the population overall	+	Aims to provide greater access to green space	
2. To maintain and improve levels of education and skills in the population overall	+	Access to sites aims to improve understanding of the environment	
3. To reduce crime and anti-social activity			
4. To reduce poverty and social exclusion	+	Aims to provide access to benefit community cohesion	
5. To improve access to key services for all sectors of the population			
6. To offer everybody the opportunity for rewarding and satisfying employment			
7. To meet the housing requirements of the whole community			
8. To improve the quality of where people live and to encourage community participation	++	Aims to provide greater access to green space and may benefit community cohesion. Green infrastructure in strategic housing growth areas a priority.	
9. To maintain and where possible improve air quality	+	Green space may help maintain/improve air quality in increasingly populated areas.	
10. To maintain and where possible improve water quality			
11. To conserve soil resources and quality	0/+	Provision of green space ensures soil resources are conserved	
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	+	Provision of green space in strategic housing growth areas ensures permeable surfaces located near new development
17. To conserve and enhance biodiversity and geodiversity	+	Aims to protect wildlife but lacks direction to enhance biodiversity
18. To conserve and where appropriate enhance areas of historical and archaeological importance		
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+	Aims to protect landscape character
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area		
21. To revitalise town centres		
22. To encourage efficient patterns of movement in support of economic growth		
23. To encourage and accommodate both indigenous and inward investment		
Assessment Summary	Sustainable policy with no negative effects identified. Modification does not alter the SA.	
Secondary, Cumulative or synergistic effects:	There is potential for a medium to long term negative effect in terms of limiting the amount of land available for housing delivery.	
Short/medium/long term effects:	Long term benefits to the health of local residents and enhancement of biodiversity.	
Mitigation proposals summary:	Clarify that enhancement to biodiversity should be sought where planning and creating new green space	

Policy:	SP18 – Infrastructure Updated	
Policy summary:	The infrastructure required in order to service and deliver new development must be in place or provided at the required phase of the development. This will entail the provision of funding from local and national government sources as well as the private sector, by a CIL or developer contribution.	
SA objective:	Impact:	Comments / Mitigation:
1. To improve the health of the population overall	+	Seeks to meet public infrastructure needs, including health facilities
2. To maintain and improve levels of education and skills in the population overall	+	Seeks to meet public infrastructure needs, potentially including schools
3. To reduce crime and anti-social activity	+	Seeks to meet public infrastructure needs, including social facilities
4. To reduce poverty and social exclusion	+	Seeks to meet public infrastructure needs, including social facilities
5. To improve access to key services for all sectors of the population	++	Seeks to meet public infrastructure needs
6. To offer everybody the opportunity for rewarding and satisfying employment	+	Provision of services will provide a range of jobs; also seeks to meet needs of commercial service provision

7. To meet the housing requirements of the whole community		
8. To improve the quality of where people live and to encourage community participation	+	Seeks to meet community infrastructure needs
9. To maintain and where possible improve air quality	+	Provision of community facilities will reduce the need to travel
10. To maintain and where possible improve water quality	+	Improved infrastructure will ensure lower quality effluent is not discharged into water courses.
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	+	Provision of community facilities will reduce the need to travel
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	+	Could help provide local jobs
21. To revitalise town centres		
22. To encourage efficient patterns of movement in support of economic growth	+	Could help provide local jobs
23. To encourage and accommodate both indigenous and inward investment		
Assessment Summary	This policy forms an important element of the strategy, especially if objectives are to be met, including those relating to sustainability. Modification updates the potential sources of funding. No change to SA.	
Secondary, Cumulative or synergistic effects:	Improvements to infrastructure resulting in better effluent quality into water courses will benefit biodiversity.	
Short/medium/long term effects:	Assists the development of balanced communities in the longer term.	
Mitigation proposals summary:	None	

The Spatial Strategy

Policy:	SP19 - Settlement Policy	Updated
Policy summary:	The creation of a settlement hierarchy based on sustainability criteria that allows appropriate scales of development whilst maintaining and enhancing the quality of the	

	built, natural , historic, social and cultural environment.	
SA objective:	Impact:	Comments / Mitigation:
1. To improve the health of the population overall	+	Largely focuses development in areas with key services, allowing more walking/cycling
2. To maintain and improve levels of education and skills in the population overall		SA updated to reflect School Organisation review has not had such a big impact as envisaged as although Middle schools have closed, secondary school provision continues in Saxmundham Free School. The settlement hierarchy mentions primary schools but on the whole does not set out a framework that will specifically guide the provision of school places. Historical precedence will continue. Transport needs linked to Leiston High School and the role it serves in that part of the District is recognised in SP 24.
3. To reduce crime and anti-social activity		
4. To reduce poverty and social exclusion	0/+	12% of the housing will be windfall and potentially spread across all sizes of settlement meaning that very small places could see a little growth.
5. To improve access to key services for all sectors of the population	++	Limits development in areas without key services and links to neighbouring settlements with services
6. To offer everybody the opportunity for rewarding and satisfying employment		
7. To meet the housing requirements of the whole community	++	Will provide housing where needed and could be responsive to changing circumstances, e.g. new employment development
8. To improve the quality of where people live and to encourage community participation	+	Could allow development appropriate to the size of settlement bringing in new people, potential for additional green space etc, depending on scale
9. To maintain and where possible improve air quality	++	Limiting development in areas without key services will reduce trip creation
10. To maintain and where possible improve water quality		
11. To conserve soil resources and quality	-	Could result in Greenfield development
12. To use water and mineral resources efficiently, and re-use and recycle where possible		
13. To reduce waste		
14. To reduce the effects of traffic on the environment	++	Limiting developing in areas without key services will reduce trip creation
15. To reduce emissions of greenhouse gasses from energy consumption		
16. To reduce vulnerability to flooding		
17. To conserve and enhance biodiversity and geodiversity	-	The Appropriate Assessment (June 2011) suggests the suggested distribution of housing allocations will result in an increase in visitor numbers to European designated sites could disturb birds protected by the designation.
18. To conserve and where appropriate enhance areas of historical and archaeological importance	+	Modified policy now mentions maintaining and enhancing the historic environment, a concern raised in the previous SA.
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+	Development in settlements based on character
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area		
21. To revitalise town centres	+	Development to take place in Major Centres, Towns and Key Service

		Centres
22. To encourage efficient patterns of movement in support of economic growth	+	Limiting development in areas without key services will reduce trip creation
23. To encourage and accommodate both indigenous and inward investment		
Assessment Summary	Within the hierarchy, settlements are categorised according to sustainability factors including size, level of facilities, and their role in relation to their locality and neighbouring settlements, as well as their physical form. The modification has strengthened the policy by the addition of specific reference to maintaining and enhancing the historic environment. Accordance or not with the hierarchy is the first issue of principle to which any future site allocation or individual development proposal should accord. It is understood that the apparent allocation of 12% of the housing requirement (950) to Other Villages and countryside is windfall that is actually likely to be spread throughout the District. The assessment shows a high level of sustainability although the cumulative impact with Ipswich Borough's housing provision of recreation demand on the European designated areas is a concern.	
Secondary, Cumulative or synergistic effects:	The cumulative impact of the housing distribution with the housing proposed in Ipswich gives rise to potential recreational impacts on European designated areas that requires mitigation.	
Short/medium/long term effects:	Long term impact of unmanaged recreational use of European designated areas could damage the asset.	
Mitigation proposals summary:	The Appropriate Assessment recommends provision of a country park in the north Ipswich area. The need to reduce demand for visits plus management of popular destinations in SPAs to minimise disturbance to birds will be required and is now reflected in SP20 so no further mitigation required.	

Policy:	SP20 – Area East of Ipswich		Updated
Policy summary:	A strategy for the settlements, countryside and employment areas east of Ipswich including planned growth on land at Adastral park with specific mitigation requirements.		
SA objective:	Impact:	Comments / Mitigation:	
1. To improve the health of the population overall	+	Minimise need for motor vehicles, upgrade foot and cycle paths for access to employment, schools etc, maximise access to green space etc. Modifications require sport provision and outside playspace linked to the Adastral park development.	
2. To maintain and improve levels of education and skills in the population overall	+	Educational facilities are identified as required to meet pre-school, primary and secondary needs linked to the Adastral park development.	
3. To reduce crime and anti-social activity			
4. To reduce poverty and social exclusion	+	Sustainable mix of housing types may include some affordable housing	
5. To improve access to key services for all sectors of the population	+	Upgrade public transport, foot and cycle paths. Good access to town centre. Need for a health centre, community hall, library and allotments linked to the Adastral park development.	
6. To offer everybody the opportunity for rewarding and satisfying employment	+	Link to existing and proposed employment, improve access to such areas. Good access to town centre	
7. To meet the housing requirements of the whole community	++	Policy aims for sustainable new housing of a mix of size, type and tenure.	
8. To improve the quality of where people live and to encourage community participation	+	Provision of planting and landscaping, blend with surrounding landscape; social and community provision in advance of or parallel	
9. To maintain and where possible improve air quality	-	Significant development likely to have some negative effect on air quality	

10. To maintain and where possible improve water quality	+	Possible increase in discharge to the estuary. However modifications now include reference to improvements to water supply networks, upgrades to waste water treatment and provision of strategic drainage to manage surface water drainage linked to the Adastral park development.
11. To conserve soil resources and quality	--	Land abutting Adastral Park is Greenfield
12. To use water and mineral resources efficiently, and re-use and recycle where possible	--	Land abutting Adastral Park is Greenfield, minerals would have to be worked out quicker than currently planned.
13. To reduce waste	0/-	Development likely to increase waste. Modifications now require on site recycling facilities linked to the Adastral park development.
14. To reduce the effects of traffic on the environment	0/-	Development likely to increase traffic considerably as this is already a heavily congested area however policy encourages use of public transport, foot and cycle provision and upgrades. Modifications require measures to manage the impact on the local road network, including A 12 and A12/14 and Foxhall road corridor, plus improved public transport to Felixstowe, Ipswich and Woodbridge linked to Adastral park development.
15. To reduce emissions of greenhouse gasses from energy consumption	0/-	Increased housing means energy consumption will increase but an element of decentralised energy provision will be required linked to Adastral park development.
16. To reduce vulnerability to flooding	-	Increased development, concrete and roads will exacerbate runoff and may increase risk of flooding
17. To conserve and enhance biodiversity and geodiversity	+	Retention of Suffolk Sandlings respected. Policy states it will preserve and enhance environmentally sensitive areas, and contribute to biodiversity and ecological networks. Area Action Plan needs to effectively safeguard the Suffolk Sandlings and River Deben designated sites. Improved access to countryside for large numbers of residents may have impacts here too, e.g. adjacent River Deben but policy now includes mitigation by requiring a country park provision as a preferred alternative to visiting European sites. Will also require an AA of the Area Action Plan and if part of the strategy cannot be delivered without adverse impacts on the Deben Estuary SPA which cannot be mitigated then the Plan will only provide for the level of development that can be accommodated without adverse effect on the integrity of the SPA.
18. To conserve and where appropriate enhance areas of historical and archaeological importance	-	Land next to Adastral Park contains a number of archaeological features
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+	Aims to create distinctive identity with smaller readily distinguishable villages, neighbourhoods and communities, advanced planting and landscaping to create new settlement boundaries etc
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Link to existing and proposed employment, improve access to such areas. Transport and infrastructure provision around strategic employment area noted. High Speed broadband required as part of the Adastral park development
21. To revitalise town centres		
22. To encourage efficient patterns of movement in support of economic growth	+	Public transport, foot and cycle path provision to be made, minimise need for motor vehicle usage
23. To encourage and accommodate both indigenous and inward investment	+	Adjacent presence of BT Adastral Park plus new residents may encourage investment, opportunities for new employment provision to be maximised.
Assessment Summary		The policy has become more sustainable following the addition of the mitigation requirements linked to the Adastral Park development. Increasing the level of housing anywhere will lead to the generation of more traffic that could impact air quality depending on location, and will result in energy being used either in transport or running homes. Several negative impacts are likely to be reduced (eg SA 13, 14 and 15) and the controls in place for the protection of biodiversity now mean there is a real possibility that development could improve the biodiversity of the area in the longer term.

Secondary, Cumulative or synergistic effects:	Impact on SPA from dog walkers as policy seeks to maximise opportunities to achieve access to green space including the countryside (see Appropriate Assessment). Also potential cumulative recreational demand stemming from the Ipswich Borough and Suffolk Coastal housing proposals in the north east area of Ipswich. The capacity of popular destinations such as Waldringfield given its limited parking, narrow roads, access to sailing facilities is limited and could impact the quality of life of such small local communities.
Short/medium/long term effects:	Strict management of visitors and the provision of new open space, managed recreational areas and gardens could improve the biodiversity in the longer term.
Mitigation proposals summary:	The policy now provides for site specific Appropriate assessment of the proposal to use land immediately abutting Adastral Park and Area Action Plan in recognition of the sensitivity of the Deben Estuary SPA. . Special attention needs to be given to the protection of the Deben estuary in the Area Action Plan to ensure its environmental quality is not damaged and also how the quality of life for popular recreational destinations can be maintained. The Appropriate Assessment states that a 1km separation of strategic allocations from European sites is necessary, plus improvements to local greenspace for routine use. This needs to be provided in the Area Action Plan and needs to be available when housing in the Adastral Park area starts to be occupied so local routines avoiding pressure on the Deben SPA are established from the outset. The AA suggested a new Country Park (or similar high quality) is needed to mitigate the cumulative effect of new housing provision in IBC and SCDC. As IBC propose country park provision within the northern fringe allocation, plus the modified policy here requires it for the Adastral Park development, provided both are available when houses are occupied, adverse impact on SPA designations should be avoided. Monitoring is needed but no further mitigation at this time.

Policy:	SP21 – Felixstowe Updated	
Policy summary:	A strategy for Felixstowe, addressing social and economic issues and mitigation for environmental impact of new development on nearby European and national environmental designations.	
SA objective:	Impact:	Comments / Mitigation:
1. To improve the health of the population overall	+	Significant improvement, expansion and retention of sport and leisure facilities; appropriate healthcare facilities provided. Access to green space/countryside may encourage healthier behaviours.
2. To maintain and improve levels of education and skills in the population overall	+	Investment in new secondary school provision and additional primary school places if required and the strategy aims to expand the employment base to provide a wider range of employment types together with enhanced education and skills alongside that provided by an expanded port function.
3. To reduce crime and anti-social activity		
4. To reduce poverty and social exclusion	+	Sustainable mix of housing types may include some affordable housing
5. To improve access to key services for all sectors of the population	++	Cumulative impact of new dispersed housing provision will be considered and developer contributions sought which may result in the relocation of existing facilities if it will result in improved services overall.
6. To offer everybody the opportunity for rewarding and satisfying employment	+	Expand local employment base and regenerate resort area
7. To meet the housing requirements of the whole community	++	Provide a scale and range of housing to meet the needs of the existing and future populations
8. To improve the quality of where people live and to encourage community participation	+	Provide for the growing need for allotments, improves access to green space/countryside.
9. To maintain and where possible improve air quality	+/-	Significant development likely to have some negative effect on air quality however improvements to strategic and local road network are proposed, including access to the Docks where the current AQMA is located.
10. To maintain and where possible improve water quality	+	Monitoring of need for flood and sea defences and securing investment should safeguard water quality especially sea water flooding of fresh

		water areas.
11. To conserve soil resources and quality	+	Seeks to preserve prime agricultural land as far as possible.
12. To use water and mineral resources efficiently, and re-use and recycle where possible		
13. To reduce waste	-	Development likely to increase waste
14. To reduce the effects of traffic on the environment	-	Development will increase traffic and improvements will be required to the strategic and local road network including consideration of a new link road. Greater use of rail will be encouraged following the dualling of the rail track. Growth to the north to be limited due to threshold of primary roads and aims to reduce commuting.
15. To reduce emissions of greenhouse gasses from energy consumption	-	Household energy consumption will increase
16. To reduce vulnerability to flooding	+	Flood risk recognised as a constraint and monitoring required as part of the policy to identify the need for further investment in flood and sea defences.
17. To conserve and enhance biodiversity and geodiversity	0/-	Provides allotments etc, but land will inevitably be lost due to development. Constraints posed by nature conservation designations are recognised. Development contributions will be sought to mitigate the impact of new development on SPA designations by creating new strategic open space. The strategy seeks to realise opportunities to achieve enhanced access to green space including the countryside also including enhanced wardening and monitoring of visitor impacts upon designated European nature conservation sites.
18. To conserve and where appropriate enhance areas of historical and archaeological importance	+	Constraints and opportunities of quality of historic core recognised.
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	++	Aims to conserve character of neighbourhoods and prevent development to north. Constraints and proximity of national landscape and nature conservation recognised.
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Link to existing and proposed employment, improve access to such areas; regenerate resort; recognises and seeks infrastructure improvements
21. To revitalise town centres	+	Expansion of retail, service and other facilities within town centre supported plus the strategy for tourism seeks to create strong links between the seafront and town centre.
22. To encourage efficient patterns of movement in support of economic growth	+	Improved access to dock from Felixstowe, Walton and Trimley villages
23. To encourage and accommodate both indigenous and inward investment	+	Regeneration of resort will increase attraction of the area to investors
Assessment Summary	<p>A largely sustainable strategy where:</p> <ol style="list-style-type: none"> 1. Impact on strategic and local roads will be managed but the provision of a new link road will by definition increase traffic movements overall (hence – for SA 14) 2. Building on a number of sites has the advantage of allowing individual communities to grow at a rate which is more readily absorbed into the existing social fabric 3. Disperses the potential negative effect of major new build, thus limiting the impact on any one of the communities of Felixstowe, Trimley St Martin, Trimley St Mary or Walton 4. Incremental development is more likely to retain the setting of the town in the countryside, which is an important element of the regeneration strategy 5. Enhanced access to green space and the countryside will be considered in the context of enhanced wardening and monitoring of visitor impact on designated European Conservation sites. <p>The modified policy proposes getting developer contributions to mitigate the</p>	

	environmental impact of new development on the Orwell and Deben estuary SPAs and towards the provision of strategic open space identified in SP20.
Secondary, Cumulative or synergistic effects:	Concern about the cumulative impact of dispersed development is recognised in the policy and will drive the need for developer contributions and could include the need to relocate existing facilities.
Short/medium/long term effects:	Short term there could be community concern about relocation of facilities but in the long term relocated facilities will give improved level of service to the expanded community.
Mitigation proposals summary:	<ol style="list-style-type: none"> 1. Adequate structural landscaping of new development given proximity to the AONB (Mitigated by SP15) 2. Need to assess potential impact on biodiversity of proposals to increase access to green space and countryside. Mitigation for the strategic implications are included in this policy and the more local implications will be considered and mitigated by SP14 and DM27. 3. Include encouragement of investment in public transport and sustainable travel infrastructure to reduce demand in the policy so that the need to improve the capacity of the local road network and solution by means of a new link road is an option of last resort if other actions fail.

Policy:	SP22 – Aldeburgh Updated		
Policy summary:	A strategy for Aldeburgh that focuses on local issues and local needs and use of previously developed land and infilling.		
SA objective:	Impact:	Comments / Mitigation:	
1. To improve the health of the population overall			
2. To maintain and improve levels of education and skills in the population overall	+	Sufficient services, education one of the priorities	
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	++	Aims to retain retail services, particularly health and education	
6. To offer everybody the opportunity for rewarding and satisfying employment	0	Retain role as a tourist centre, keep jobs in this sector	
7. To meet the housing requirements of the whole community	+	New housing for local people proposed from brownfield or infilling, including affordable housing.	
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	+	Encourages use of previously developed land	
12. To use water and mineral resources efficiently, and re-use and recycle where possible			

13. To reduce waste	0/-	Minimal new housing may increase waste output
14. To reduce the effects of traffic on the environment	0/-	Some increase in traffic may occur, although tourism will account for a large proportion of traffic and this level is to be maintained
15. To reduce emissions of greenhouse gasses from energy consumption	0/-	Minimal new housing may increase traffic and therefore increase emissions
16. To reduce vulnerability to flooding	++	Flood risk is to be minimised and defences effectively managed; traffic restricted from causing potential damage to defences
17. To conserve and enhance biodiversity and geodiversity	0/-	Sensitive environment to be maintained, but some development may reduce biodiversity value
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	++	Strategy aims to retain and protect historic character without suffering "town cramming"; retain retail and services; retain environment
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	0/+	Tourism aspect to be maintained; retail and services to be retained; sufficient services and facilities may provide some growth opportunities
21. To revitalise town centres	+	Traffic management measures on the High Street and elsewhere providing improved physical environment
22. To encourage efficient patterns of movement in support of economic growth		
23. To encourage and accommodate both indigenous and inward investment		
Assessment Summary	A strategy that is sustainable in its content given the emphasis on preserving the distinctiveness of Aldeburgh and focusing on local needs. The few negative scores reflect the likelihood of some development taking place; though as this is not to be at a strategic level. The strategy is considered appropriate given that the town has no secondary school. Modified policy allows slightly more flexibility, anticipating housing within the physical limits boundary or in accordance with other policies.	
Secondary, Cumulative or synergistic effects:	Allowing some development particularly for affordable housing will help the age imbalance in the short term and help to maintain existing services for children. With improving average health of older people this may be sufficient; otherwise key worker residency will need to be considered linked to older people's housing.	
Short/medium/long term effects:		
Mitigation proposals summary:	None required at the moment but continued monitoring of the age balance and commuting flows is needed.	

Policy:	SP23 – Framlingham		No change
Policy summary:	A strategy for Framlingham that maintains its role as a self-sufficient market town and tourist destination		
SA objective:	Impact:	Comments / Mitigation:	
1. To improve the health of the population overall			
2. To maintain and improve levels of education and skills in the population overall	+	Sufficient education services to serve the population profile required	
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	++	Improve access to town centre facilities through improvements to car parks, local public transport provision; sufficient services and facilities, retail designed to serve needs of local population + hinterland and visitor populations
6. To offer everybody the opportunity for rewarding and satisfying employment	+	Increase scale and range of employment offer
7. To meet the housing requirements of the whole community	+	Some housing development on brownfield land
8. To improve the quality of where people live and to encourage community participation	0/+	Maintenance of character a priority
9. To maintain and where possible improve air quality	-	Development likely to have some negative effect on air quality
10. To maintain and where possible improve water quality		
11. To conserve soil resources and quality	+	Aims to redevelop brownfield land
12. To use water and mineral resources efficiently, and re-use and recycle where possible		
13. To reduce waste	0/-	Limited development may increase waste
14. To reduce the effects of traffic on the environment	0/-	Limited development may increase traffic
15. To reduce emissions of greenhouse gasses from energy consumption	0/-	Limited development may mean rise in household energy consumption
16. To reduce vulnerability to flooding	0/-	Limited development may increase vulnerability to flooding
17. To conserve and enhance biodiversity and geodiversity	0/-	Limited development may reduce overall value of the area to 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	++	Maintain historic quality character, avoid "town cramming", recognise sensitive setting and edges of town, ensure retail provision for tourism is balanced and designed to serve the needs of local population
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Retains role as a tourist centre, accommodation and visitor attractions will maintain economic performance in the area; increased scale and range of employment opportunities
21. To revitalise town centres		
22. To encourage efficient patterns of movement in support of economic growth	+	Linkages with local public transport
23. To encourage and accommodate both indigenous and inward investment	+	Tourism may attract investment
Assessment Summary	Overall a more sustainable strategy than assessed previously. Development to take place only within defined physical limits and mostly on PDL (not to meet strategic needs). Strategies that contain housing or employment growth generally score negatively because they do not contain specific reference to possible environmental constraints. Increasing the level of housing anywhere will lead to the generation of more traffic that could impact air quality depending on location, and will result in energy being used either in transport or running homes. There are focused core strategy environmental policies elsewhere that will be brought to bear when planning applications are determined hence this is not a concern.	

Secondary, Cumulative or synergistic effects:	
Short/medium/long term effects:	
Mitigation proposals summary:	Attention to environmental factors when detailed proposals are drafted and planning proposals considered

Policy:	SP24 – Leiston Updated	
Policy summary:	A strategy for Leiston that strengthens its economic base and achieves new housing, particularly for local need, recognising that nuclear safeguarding will influence the future expansion of the town. An Area Action Plan will be prepared but not now with Saxmundham.	
SA objective:	Impact:	Comments / Mitigation:
1. To improve the health of the population overall		
2. To maintain and improve levels of education and skills in the population overall	+	Sufficient education services to serve the population profile required. Following the School Organisation Review a High school will continue in Leiston, serving a broader area although the Middle School in Saxmundham has become a Free School, providing competition and local choice. The policy recognises the role of the facilities available at the High school which serves a wider catchment and the need to work with public transport providers to maintain and improve accessibility.
3. To reduce crime and anti-social activity		
4. To reduce poverty and social exclusion	+	Affordable housing provision prioritised
5. To improve access to key services for all sectors of the population	+	Focus on retention and improvement of quality and range of facilities.
6. To offer everybody the opportunity for rewarding and satisfying employment	+	Anticipated increase in tourism, employment in facilities
7. To meet the housing requirements of the whole community	+	Modest new housing provision planned with priority given to affordable housing to meet local needs.
8. To improve the quality of where people live and to encourage community participation	+	Improved physical environment sought
9. To maintain and where possible improve air quality	-	Development likely to have some negative effect on air quality
10. To maintain and where possible improve water quality	0/-	Waste water generated by further development will take flows discharged through Leiston sewage works beyond the current volumetric permit.
11. To conserve soil resources and quality	+/-	Brownfield and greenfield opportunities are identified.
12. To use water and mineral resources efficiently, and re-use and recycle where possible		
13. To reduce waste	-	Development likely to increase waste
14. To reduce the effects of traffic on the environment	-	Development likely to increase traffic
15. To reduce emissions of greenhouse gasses from energy consumption	-	Household energy consumption will increase
16. To reduce vulnerability to flooding	-	Increased development may increase 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	++	Conservation of local character of prime importance
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Retains role as a tourist centre, accommodation and visitor attractions will maintain economic performance in the area; increased scale and range of employment opportunities
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	+	Tourism may attract investment
Assessment Summary	Policy as modified is more positive about development. Strategies that contain housing or employment growth generally score negatively because they do not contain specific reference to possible environmental constraints. Increasing the level of housing anywhere will lead to the generation of more traffic that could impact air quality depending on location, and will result in energy being used either in transport or running homes. There are focused core strategy environmental policies elsewhere that will be brought to bear when planning applications are determined hence this is not a concern. Nuclear safeguarding will influence where future of expansion of the town to the east but brownfield and greenfield sites are available.	
Secondary, Cumulative or synergistic effects:	The cumulative impact of development and infrastructure needs in Leiston and Saxmundham will now not be considered in an Area Action Plan. The settlements are over 4 miles apart and now Saxmundham will continue to have a secondary school it is perhaps less necessary and allows focus on the best place for development to go in Leiston.	
Short/medium/long term effects:		
Mitigation proposals summary:	Attention to environmental factors when detailed proposals are drafted and planning proposals considered. Increase in waste water flows to Leiston sewage works should be controlled through the application of SP1 and SP2 which require provision of appropriate infrastructure in a timely manner. No additional mitigation required.	

Policy:	SP25 – Saxmundham		Updated
Policy summary:	A strategy for Saxmundham that enables appropriate housing development and focuses on its role as a retail and service centre, as well as a transport hub. Modification has removed the intention to prepare an Area Action Plan with Leiston.		
SA objective:	Impact:	Comments / Mitigation:	
1. To improve the health of the population overall			
2. To maintain and improve levels of education and skills in the population overall	+	Policy does not recognise that as a result of the School Organisation review that the middle school closed but there is now a Free School. However this improves the education possibilities locally and offers choice plus facilities for extra curricular activities and adult education.	
3. To reduce crime and anti-social activity			
4. To reduce poverty and social exclusion	+	Affordable housing provision prioritised	
5. To improve access to key services for all sectors of the population	+	Town to become a transport hub on East Suffolk rail-line, serving the local area	
6. To offer everybody the opportunity for rewarding and satisfying employment	++	Up-grading of physical environment anticipated to increase appeal to tourists, therefore offering opportunities for employment; employment base to be increased to offer job prospects within the local area	

7. To meet the housing requirements of the whole community	+	New development, including affordable housing to meet local needs is encouraged.
8. To improve the quality of where people live and to encourage community participation	+	Improved physical environment and greater social integration sought
9. To maintain and where possible improve air quality	-	Development of employment/residential areas likely to have some negative effect on air quality through traffic generation.
10. To maintain and where possible improve water quality	0/-	Currently insufficient infrastructure which could result in a negative effect on water quality.
11. To conserve soil resources and quality	-	Greenfield land previously allocated remains set to be used for housing
12. To use water and mineral resources efficiently, and re-use and recycle where possible		
13. To reduce waste	-	Development likely to increase waste
14. To reduce the effects of traffic on the environment	-	Development, particularly tourism, likely to increase traffic
15. To reduce emissions of greenhouse gasses from energy consumption	-	Household and business energy consumption will increase
16. To reduce vulnerability to flooding	--	Increased development may increase vulnerability to flooding, noted as a constraint but not addressed by policy. Development by the river planned
17. To conserve and enhance biodiversity and geodiversity	-	Development will reduce overall value of the area to biodiversity and geodiversity. Further Greenfield release unnecessary (aside that already allocated), sites available within the town.
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	+	Up-grading of physical environment, consolidate role of market town.
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Retains role as a tourist centre, accommodation and visitor attractions will maintain economic performance in the area; increased employment base
21. To revitalise town centres	+	Development to aid regeneration of the town centre
22. To encourage efficient patterns of movement in support of economic growth		
23. To encourage and accommodate both indigenous and inward investment	+	Tourism may attract investment
Assessment Summary	The strategy allows development for local needs that might be higher now the uncertainty about the school has been resolved and a Free School opened in Saxmundham. Outstanding allocations for residential development by River Fromus – creates public open space and regenerate town centre but may increase risk of flooding despite this being noted as a constraint for the strategy. Strategies that contain housing or employment growth generally score negatively because they do not contain specific reference to possible environmental constraints. Increasing the level of housing anywhere will lead to the generation of more traffic that could impact air quality depending on location, and will result in energy being used either in transport or running homes. There are focused core strategy environmental policies elsewhere that will be brought to bear when planning applications are determined hence this is not a concern. There are also concerns about infrastructure capacity what could lead to a risk to water quality.	
Secondary, Cumulative or synergistic effects:	Provision of Free School could raise demand for housing.	
Short/medium/long term effects:	Modified policy does not require an Area Action to be prepared and could lead to quicker growth. Longer term Saxmundham has the potential to grow as a quaint	

	market town, well located near the A12, developing its own character that is quite separate to Leiston.
Mitigation proposals summary:	Attention to environmental factors when detailed proposals are drafted and planning proposals considered. Increase in waste water flows should be controlled through e application of SP1 and SP2 which require provision of appropriate infrastructure in a timely manner. No further mitigation required.

Policy:	SP26 – Woodbridge Updated	
Policy summary:	A strategy for Woodbridge that consolidates its current role and preserves its qualities, whilst achieving modest expansion	
SA objective:	Impact:	Comments / Mitigation:
1. To improve the health of the population overall	+	Encourage wider use of walking and cycling
2. To maintain and improve levels of education and skills in the population overall	+	The role of the High school in providing a range of facilities is recognised and improvements to public transport accessibility will be sought to benefit a wider rural catchment area.
3. To reduce crime and anti-social activity		
4. To reduce poverty and social exclusion	+	Sustainable mix of housing types may include some affordable housing
5. To improve access to key services for all sectors of the population	+	Enhanced links between town centre, Market Hill & riverside; range of provisions for residents/rural catchment and tourists
6. To offer everybody the opportunity for rewarding and satisfying employment	++	Employment and tourism uses to be prioritised ahead of residential; enhancement of anchor stores and small businesses encouraged
7. To meet the housing requirements of the whole community	++	Residential uses to be resisted in the riverside; appropriate development will be accommodated on a range of sites across the town and expansion of Woodbridge (an Melton) will be considered.
8. To improve the quality of where people live and to encourage community participation	+	Enhanced quality of town centre, traffic management, vibrant riverside environment, high quality historic built environment to be maintained
9. To maintain and where possible improve air quality	--	Tourism gateway to AONB likely to have some negative effect on air quality. Potential further impact on existing Air Quality Management Area.
10. To maintain and where possible improve water quality	0/-	Aims to retain quality of River Deben, some additional pollution possible due to town being adjacent to river
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	0/-	Largely a strategy of constraint
14. To reduce the effects of traffic on the environment	0/-	Development and tourism likely to increase traffic although gateway role could focus traffic in Woodbridge
15. To reduce emissions of greenhouse gasses from energy consumption	-	Energy consumption will increase
16. To reduce vulnerability to flooding	-	Increased development, concrete and roads will exacerbate runoff and may increase risk of flooding in this riverside town, although strategy does acknowledge limitations imposed by the river
17. To conserve and enhance biodiversity and geodiversity	+	Aims to retain quality and character of riverside and estuary, environmental considerations noted as constraint
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	+	A12 to remain firm edge to town; retain quality and character of riverside and estuary
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Encouragement of businesses, vibrant riverside environment while retaining quality of the built and natural environment
21. To revitalise town centres	+	Will bring new business to town centre
22. To encourage efficient patterns of movement in support of economic growth	+	Encourages wider use of walking; links between town centre, Market Hill and riverside improved
23. To encourage and accommodate both indigenous and inward investment	++	Encouraging small scale independent businesses; tourism and employment uses to take priority in the town
Assessment Summary	The modified policy means there is less constraint on housing development but that this will be appropriate to the physical and environmental constraints. The overall sustainability of the policy has improved. Increasing the level of housing and employment and encouraging tourism will lead to the generation of more traffic that could impact air quality depending on location, and will result in energy being used either in transport or running homes.. The policy also notes that the quality of the riverside and estuary and related environmental quality be regarded as a constraint.	
Secondary, Cumulative or synergistic effects:	Marketing of Woodbridge as a 'gateway' to the AONB could create traffic movements through the town, in addition to new development.	
Short/medium/long term effects:		
Mitigation proposals summary:	Attention to environmental factors when detailed proposals are drafted and planning proposals considered. Traffic management in Woodbridge is proposed so it is not disadvantaged by 'gateway' role, especially considering the challenges of the location of the existing Air Quality Management Area. There are focused core strategy environmental policies elsewhere that will be brought to bear when planning applications are determined hence this is not a concern. No further mitigation required.	

Policy:	SP27 – Key and Local Service Centres		Updated
Policy summary:	The strategy for communities outside of the towns and major centres identified as key and local service centres. Housing development will be permitted within physical limits boundaries or where there is a proven local support		
SA objective:	Impact:	Comments / Mitigation:	
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	++	Aims to address issue of rural isolation through better access provision to key service centres, and to affordable housing.	
5. To improve access to key services for all sectors of the population	++	Provision of services in key service centres, linked to rural communities with improved access provision	
6. To offer everybody the opportunity for rewarding and satisfying employment	+	Linked employment and housing development at a scale appropriate to settlement	
7. To meet the housing requirements of the whole community	++	Modest growth to occur in larger more sustainable settlements; organic development elsewhere, open market and affordable. Where proven local support exists small allocations may be made	
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	0/-	Some thinly spread development may increase waste
14. To reduce the effects of traffic on the environment	0/-	Developments thinly spread across the rural area so major effects unlikely
15. To reduce emissions of greenhouse gasses from energy consumption	+/-	Developments thinly spread across the rural area so major effects unlikely; better access provision to key areas may reduce private car usage
16. To reduce vulnerability to flooding		
17. To conserve and enhance biodiversity and geodiversity	0/-	Development in the rural areas may impact on biodiversity
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	0	Modest growth only in larger more sustainable settlements
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Better access to key service centres may increase prosperity in rural communities
21. To revitalise town centres		
22. To encourage efficient patterns of movement in support of economic growth	+	Improved access provision to key service centres aims to reduce private car usage
23. To encourage and accommodate both indigenous and inward investment		
Assessment Summary	Scores highly on sustainability criteria because of the recognition of social and economic factors, in particular access to services	
Secondary, Cumulative or synergistic effects:	Small levels of housing development will assist the viability of services.	
Short/medium/long term effects:		
Mitigation proposals summary:	Recognition of biodiversity issues in the detailed appraisal of proposals	

Policy:	SP28 – Other Villages		No change
Policy summary:	A strategy that protects the countryside for its own sake. Development outside the physical limits of those settlements defined as major centres, key service centres or local service centres will only be permitted in exceptional circumstances.		
SA objective:	Impact:	Comments / Mitigation:	
1. To improve the health of the population overall	+	Recognises important role of countryside in quality of life/access to green space	
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	+	Allows affordable units butting towns, key service centres, local service centres
6. To offer everybody the opportunity for rewarding and satisfying employment	+	Supports the rural economy
7. To meet the housing requirements of the whole community	+	Accepts need for 1 or 2 dwellings for affordable housing in other villages in countryside for agriculture, affordable abutting towns/KSC & LSC
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	+	Development must meet needs of agriculture, forestry and horticulture; re-use existing buildings
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	+	Development must not conflict with flood risk
17. To conserve and enhance biodiversity and geodiversity	++	Aims to protect the rural environment and restrict development
18. To conserve and where appropriate enhance areas of historical and archaeological importance	+	Cumulative impact on character of settlement considered
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	++	Aims to restrict development to minimise impact on local character
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Supports needs of agriculture
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		
Assessment Summary	A strongly sustainable strategy that recognises the social, economic and environmental dimensions of the countryside and smaller, less sustainable settlements	
Secondary, Cumulative or synergistic effects:	Cumulative effect of small developments on character of the settlement is included in the policy.	

Short/medium/long term effects:	None relevant
Mitigation proposals summary:	None required

Policy:	SP29 – The Countryside Updated	
Policy summary:	New development in the countryside will be limited to that which of necessity requires to be located there and accords with other policies (eg SP7 or DM13) or paragraph 55 of the NPPF.	
SA objective:	Impact:	Comments / Mitigation:
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	+	Could allow housing for rural workers to live permanently near place of work, providing near site presence that would deter crime.
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	+	Allows rural diversification in the countryside
7. To meet the housing requirements of the whole community	+	Allows housing for rural workers
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	-	Likely to use greenfield for new rural worker housing
12. To use water and mineral resources efficiently, and re-use and recycle where possible		
13. To reduce waste	-	Any new development will produce waste and it is unlikely to be in volumes that can trigger recycling facilities.
14. To reduce the effects of traffic on the environment		Volumes generated are likely to be insignificant.
15. To reduce emissions of greenhouse gasses from energy consumption		
16. To reduce vulnerability to flooding		
17. To conserve and enhance biodiversity and geodiversity	?	New development will change biodiversity: new housing may increase biodiversity through provision of gardens; farm diversification may change land uses but likely to be small scale and not impact designated areas.
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	0/-	Small scale development can impact landscape

20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	++	Recognises the countryside as an economic, social and environmental asset which is important to sustain.
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	+	Slightly more positive wording of modified policy and reference to NPPF criteria to identify special circumstances such as use of a heritage asset to secure its future could encourage investment.
Assessment Summary	The modified policy allows development which of necessity requires to be in the countryside. Overall the policy is sustainable with economic and social benefits whilst the negative implications will be controlled by application of DM policies or will be very small scale.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	Great care needs to be taken in the design of development to protect against landscape impacts (should be achieved by DM 21 Aesthetics) whilst any likely biodiversity impacts will be identified and considered as a result of DM 27.	

Policy:	SP30 – The Coastal Zone		No change
Policy summary:	Sets out the approach to dealing with climate change and need for partnership working		
SA objective:	Impact:	Comments / Mitigation:	
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	+	Safeguards current housing stock	
8. To improve the quality of where people live and to encourage community participation	0/+	Lessened risk of flooding should help improve quality of life for coastal households.	
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	+	+ Aims to prevent erosion	
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	++	++ Aims to protect property from erosion
17. To conserve and enhance biodiversity and geodiversity	+	Supports shoreline management plan
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	+	Supports shoreline management plan
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		
Assessment Summary	The strategy refers to the issue of coastal erosion and encourages investment in safeguarding of property. There is implicit recognition of the need to land use planning decisions in the long term to protect or relocate housing features or replacement habitats.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	None required	

APPENDIX C: Development Management (DM) Sustainability Appraisal Tables

Policy:	DM1 – Affordable Housing on Exception Sites		No change
Policy summary:	Permitting affordable housing schemes as exceptions to policy, adjacent to market towns, key service centres and local service centres, or within other villages.		
SA objective:	Impact:	Comments / Mitigation:	
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	++	Aims to benefit those on low incomes	
5. To improve access to key services for all sectors of the population	+	Ensures affordable homes are located near services and facilities	
6. To offer everybody the opportunity for rewarding and satisfying employment			
7. To meet the housing requirements of the whole community	++	Provides housing for 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	0/-	Could have negative impact	
10. To maintain and where possible improve water quality			
11. To conserve soil resources and quality	0/-	Will take land for housing	
12. To use water and mineral resources efficiently, and re-use and recycle where possible			
13. To reduce waste	0/-	Potentially can generate more waste.	
14. To reduce the effects of traffic on the environment	0/-	May increase traffic, but not significantly.	
15. To reduce emissions of greenhouse gasses from energy consumption	0/-	Sustainable building design can mitigate against this SA objective. (DC24)	
16. To reduce vulnerability to flooding			
17. To conserve and enhance biodiversity and geodiversity	0/-	Not mentioned in this policy wording.	
18. To conserve and where appropriate enhance areas of historical and archaeological importance	+	Scale and character of settlement considered	
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+	Effect on countryside considered	
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	New housing can help support services	
21. To revitalise town centres			

22. To encourage efficient patterns of movement in support of economic growth	+	Proximity to services will contribute to efficient patterns of movement.
23. To encourage and accommodate both indigenous and inward investment		
Assessment Summary	Policy does not seek to consider local bio or geodiversity issues or encourage waste minimisation.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	None required as concerns raised above will be considered by other policies.	

Policy:	DM2 – Affordable Housing on Residential Sites		No change
Policy summary:	In housing developments above certain sizes requiring one in three new units to be affordable ones.		
SA objective:	Impact:	Comments / Mitigation:	
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	++	Aims to benefit those on low incomes	
5. To improve access to key services for all sectors of the population	+	Ensures affordable homes are located near services and facilities	
6. To offer everybody the opportunity for rewarding and satisfying employment			
7. To meet the housing requirements of the whole community	++	Provided housing for 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	0/-	Could have some negative effects but no different to open market housing	
10. To maintain and where possible improve water quality			
11. To conserve soil resources and quality	0/-	Will take land	
12. To use water and mineral resources efficiently, and re-use and recycle where possible			
13. To reduce waste	0/-	Potentially can generate waste but no different to open market housing.	
14. To reduce the effects of traffic on the environment	+	Proximity of public transport should reduce the effects of traffic on the environment.	
15. To reduce emissions of greenhouse gasses from energy consumption	0/-	Sustainable building design can mitigate against this SA objective. (DC24)	

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	+	Proximity to services will contribute to efficient patterns of movement.
21. To revitalise town centres		
22. To encourage efficient patterns of movement in support of economic growth	+	Proximity to services will contribute to encouragement of efficient patterns of movement.
23. To encourage and accommodate both indigenous and inward investment		
Assessment Summary	Slight negatives are unlikely to be any different to open market housing.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	None required	

Policy:	DM3 – Housing in the Countryside Updated	
Policy summary:	New housing will be permitted in the countryside where it is for specified purposes	
SA objective:	Impact:	Comments / Mitigation:
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	+	Allows affordable housing and housing for rural workers to live permanently near their place of work , provision for gypsies and travellers
5. To improve access to key services for all sectors of the population		
6. To offer everybody the opportunity for rewarding and satisfying employment	+	Supports rural enterprises
7. To meet the housing requirements of the whole community	+	Allows housing for rural workers, affordable housing and for gypsies and travellers
8. To improve the quality of where people live and to encourage community participation	+	Allows residential annexes and replacement dwellings

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	-	Any new development will produce waste and it is unlikely to be in volumes that can trigger recycling facilities.
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	?	New development will change biodiversity: new housing may increase biodiversity through provision of gardens; farm diversification may change land uses but likely to be small scale and not impact designated areas.
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	+	Does not allow replacement dwellings that are more visually intrusive
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	+	Allows dwellings linked to employment
23. To encourage and accommodate both indigenous and inward investment		
Assessment Summary	The modified policy is positively expressed allowing development in certain circumstances. Overall it is sustainable and any concerns about biodiversity will be considered by DM 27. Consideration of gypsy and traveller needs included, particularly benefiting social inclusion.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	None required	

Policy:	DM4 – Housing in Clusters in the Countryside	No change
Policy summary:	Proposals for new dwellings within clusters of houses in the countryside will be permitted subject to specified criteria	
SA objective:	Impact:	Comments / Mitigation:

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	+	Allows infilling
8. To improve the quality of where people live and to encourage community participation		
9. To maintain and where possible improve air quality	0/-	Development could add to air quality issues.
10. To maintain and where possible improve water quality	0/-	Could be slight negative effect – mitigation achieved by using SUDs to maintain 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	-	More buildings – more waste generated.
14. To reduce the effects of traffic on the environment	-	Potential for more traffic.
15. To reduce emissions of greenhouse gasses from energy consumption	0/-	More traffic – more carbon dioxide. Mitigation – monitoring.
16. To reduce vulnerability to flooding		
17. To conserve and enhance biodiversity and geodiversity	0/+	Sensitive locations taken into account
18. To conserve and where appropriate enhance areas of historical and archaeological importance	++	Character and appearance considered
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	++	Impact on Conservation Areas, AONB & Special Landscape Areas considered.
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area		
21. To revitalise town centres	+	Allows infill in town centres
22. To encourage efficient patterns of movement in support of economic growth	+	Allows infill in settlements that have services and jobs.
23. To encourage and accommodate both indigenous and inward investment		

Assessment Summary	Possible negative impacts on water is mitigated by SP33 climate change mitigates air quality and greenhouse emissions.
Secondary, Cumulative or synergistic effects:	
Short/medium/long term effects:	
Mitigation proposals summary:	None required

Policy:	DM5 – Conversions and Houses in Multiple Occupation	Updated
Policy summary:	The criteria against which proposals to convert houses into units of multiple occupation will be considered.	
SA objective:	Impact:	Comments / Mitigation:
1. To improve the health of the population overall	+	Protects against loss of private amenity space
2. To maintain and improve levels of education and skills in the population overall		
3. To reduce crime and anti-social activity	+	Considers problems from structure-borne noise
4. To reduce poverty and social exclusion		
5. To improve access to key services for all sectors of the population		Supporting text now says locations close to a good range of services are likely to be the most suitable to this type of use.
6. To offer everybody the opportunity for rewarding and satisfying employment		
7. To meet the housing requirements of the whole community	+	Contributes to range of housing available
8. To improve the quality of where people live and to encourage community participation		
9. To maintain and where possible improve air quality	-/+	Will increase traffic by providing parking but considers public transport available
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	-	Increased occupants will increase waste
14. To reduce the effects of traffic on the environment	-/+	Will increase traffic but encourages use of public transport
15. To reduce emissions of greenhouse gasses from energy consumption	-	More residents will increase energy use
16. To reduce vulnerability to flooding		
17. To conserve and enhance biodiversity and geodiversity	+	Resists loss of gardens and amenity space
18. To conserve and where appropriate enhance areas of historical and archaeological importance	+	Protects external character of building

19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+	Protects against impact on area
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	+	Proximity of homes and jobs could encourage efficient movements
23. To encourage and accommodate both indigenous and inward investment		
Assessment Summary	Supporting text now says locations close to a good range of services are likely to be the most suitable to this type of use so has removed previous concern that conversions could be allowed in locations lacking services, as long as public transport available. Assumed structure-borne noise means resident noise that could disturb others.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	None required.	

Policy:	DM6 – Residential Annexes		No change
Policy summary:	The circumstances in which self-contained annexes to existing dwellings will be permitted, for example for an elderly relative. Such annexes could be in the form of extensions, conversions of out-buildings or new build.		
SA objective:	Impact:	Comments / Mitigation:	
1. To improve the health of the population overall	+	Benefits elderly or disabled dependants & protects against loss of residential amenity	
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	+	Encourages inclusion by keeping families together	
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	++	Assist provision of specialist housing	
8. To improve the quality of where people live and to encourage community participation	+	Benefits elderly and disabled	
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	0/-	May result in loss of gardens
18. To conserve and where appropriate enhance areas of historical and archaeological importance	+	No adverse effect on visual amenity allowed
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	++	No adverse effect on visual amenity or landscape allowed
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		
Assessment Summary	No significant negative impacts.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	None required	

Policy:	DM7 – Infilling and Backland Development within settlement envelopes No change	
Policy summary:	The circumstances in which the sub-division of plots, e.g. by building on the garden of a house, will be permitted.	
SA objective:	Impact:	Comments / Mitigation:
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	+	Additional dwellings will contribute to meeting the housing requirements .
8. To improve the quality of where people live and to encourage community participation		
9. To maintain and where possible improve air quality	0/-	Principles of sustainable building design will mitigate any negative effects on air quality.
10. To maintain and where possible improve water quality	0/-	Principles of sustainable building design will mitigate any negative effects on 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	-	More buildings – more waste.
14. To reduce the effects of traffic on the environment	-	Potentially more cars
15. To reduce emissions of greenhouse gasses from energy consumption	0/-	Could be mitigated by using principles of sustainable building design.
16. To reduce vulnerability to flooding		
17. To conserve and enhance biodiversity and geodiversity	0/-	Loss of gardens
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	+	Protects character of surroundings
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Seeks efficient use of land that does not prejudice development of adjacent land
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	+	Seeks efficient use of land that does not prejudice development of adjacent land
Assessment Summary	Principles of sustainable building design will mitigate any negative effects	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	None	

Policy:	DM8 – Extensions to Residential Curtilages		No change
Policy summary:			
SA objective:	Impact:	Comments / Mitigation:	
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	0/+	Increases individual satisfaction for where they live
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	+	Protects hedgerows/requires replacement
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	+	Does not allow visual intrusion into countryside
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		
Assessment Summary	No major sustainability issues	

Secondary, Cumulative or synergistic effects:	
Short/medium/long term effects:	
Mitigation proposals summary:	None

Policy:	DM9 – Gypsies, Travellers and Travelling Showpersons Updated	
Policy summary:	The criteria against which proposals for sites and pitches will be assessed, including personal as well as site criteria.	
SA objective:	Impact:	Comments / Mitigation:
1. To improve the health of the population overall	+	Health needs of gypsies and travellers considered.
2. To maintain and improve levels of education and skills in the population overall	+	Considers needs of children's education
3. To reduce crime and anti-social activity		
4. To reduce poverty and social exclusion	+	Encourages sites to be well related to existing urban areas.
5. To improve access to key services for all sectors of the population	+	Encourages sites to be well related to existing urban areas.
6. To offer everybody the opportunity for rewarding and satisfying employment		
7. To meet the housing requirements of the whole community	+	Recognises needs of gypsies, travellers and showpeople
8. To improve the quality of where people live and to encourage community participation	+/-	Positive for gypsies but may be negative for existing residents. Allows for self management by occupants for sites up to 10 pitches.
9. To maintain and where possible improve air quality	0/-	Slightly negative due to the additional traffic.
10. To maintain and where possible improve water quality	+	Considers need for mains water and sewage
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	-	Can generate more waste.
14. To reduce the effects of traffic on the environment	-	Generate more traffic.
15. To reduce emissions of greenhouse gasses from energy consumption	0/-	More traffic & energy use cause more carbon dioxide emissions.
16. To reduce vulnerability to flooding	+	Sites must not be vulnerable to flooding
17. To conserve and enhance biodiversity and geodiversity	+	Considered within and adjacent to site
18. To conserve and where appropriate enhance areas of historical and archaeological importance	0/-	Visual impact considered but not archaeological assets.

19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+	Visual impact considered
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		
Assessment Summary	<p>Modified policy recognises new Travellers have the biggest need and that self management of sites is allowed for up to 10 pitches. This is a largely sustainable policy but raises an issue about the protection of archaeological sites. SCDC do not have a policy but rely on national policy statements. This is now the NPPF and para 128 sets out what the LPA should consider if a planning application impacts a historic asset.</p> <p>Waste minimisation is not considered but could be achieved through provision of waste disposal facilities in particular encouraging recycling.</p>	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	<p>No mitigation proposed but raises concern that the core strategy does not have a positive strategy regarding the conservation and enjoyment of the historic environment including archaeological heritage assets most at risk through neglect, decay or other threats. (NPPF paragraph 126). Supporting text to SP15 that deals with the historic environment including archaeology states that the designation of conservation areas, scheduled ancient monuments, historic parklands and the listing of buildings are all issues that can be addressed outside the Local Development Framework through the NPPF and SPDs</p>	

Policy:	DM10 – Protection of Employment Sites		Updated
Policy summary:	Sets out the conditions that need to be met for a change of use of redevelopment of an existing site with employment use to a non employment use.		
SA objective:	Impact:	Comments / Mitigation:	
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	+	Reuse of redundant sites can reduce vandalism	
4. To reduce poverty and social exclusion			
5. To improve access to key services for all sectors of the population	+	Change to residential use has to be on site within physical limits boundary	
6. To offer everybody the opportunity for rewarding and satisfying employment	+	Seeks to retain employment sites	
7. To meet the housing requirements of the whole community	+	Can allow change to residential	
8. To improve the quality of where people live and to encourage community participation	+	Redevelopment can improve quality of place	

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	?/-	Impact will depend on previous use but not specifically considered
18. To conserve and where appropriate enhance areas of historical and archaeological importance	-	Industrial archaeology or historic buildings not considered
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	-	Impact not considered
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Seeks to retain employment uses by setting criteria that needs to be met
21. To revitalise town centres		
22. To encourage efficient patterns of movement in support of economic growth	+	Planning benefit of change considered
23. To encourage and accommodate both indigenous and inward investment	+	Potential change of use may encourage investment
Assessment Summary	Largely sustainable policy. Replacement activity on site means likely to be little change to traffic, waste etc	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	None as potential negative impacts will be controlled by the application of other policies/ NPPF at the application stage.	

Policy:	DM11 – Warehousing and Storage		No change
Policy summary:	Guidance on suitable locations for warehouses, storage compounds, open storage.		
SA objective:	Impact:	Comments / Mitigation:	
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	0/-	Increased HGV traffic, pollution
10. To maintain and where possible improve water quality		
11. To conserve soil resources and quality	-	Greenfield land may be utilised.
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	0/-	Increased traffic, including HGVs, to warehouse, but locations must be well related to primary road network
15. To reduce emissions of greenhouse gasses from energy consumption	-	Increased traffic can cause more carbon dioxide.
16. To reduce vulnerability to flooding	-	Increased impermeable surface increases runoff.
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	+	Encourages economic growth, particularly recognising needs related to agriculture, resulting in more employment opportunities.
21. To revitalise town centres		
22. To encourage efficient patterns of movement in support of economic growth	+	More local warehousing may aid efficient distribution of goods
23. To encourage and accommodate both indigenous and inward investment	+	Encourages economic growth, more employment opportunities.
Assessment Summary	Negative impacts on SA Objectives 9, 14 and 15 are triggered by the increase in HGV traffic associated with warehousing and storage depots. Priority needs to be given to the reuse of brownfield land before Greenfield (mitigated by Core Strategy policy 1). Mitigation to reduce vulnerability to flooding is to require sustainable drainage systems are installed (covered by Core Strategy Policy 1 and DM25)	

Secondary, Cumulative or synergistic effects:	
Short/medium/long term effects:	
Mitigation proposals summary:	No additional mitigation required.

Policy:	DM12 – Expansion and Intensification of Employment Sites Updated	
Policy summary:	Considerations to apply in the case of proposals to expand or intensify existing employment uses. Reference to mitigation measures designed to reduce vehicle movements.	
SA objective:	Impact:	Comments / Mitigation:
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	+	Considers provision of services
6. To offer everybody the opportunity for rewarding and satisfying employment	++	Potential to create more job opportunities.
7. To meet the housing requirements of the whole community		
8. To improve the quality of where people live and to encourage community participation	++	Considers impact on residential amenity & living conditions
9. To maintain and where possible improve air quality	+	Considers living conditions
10. To maintain and where possible improve water quality	0/-	Usage of SUDs will be a mitigation measure.
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	+	Considers transport and traffic mitigation measures
15. To reduce emissions of greenhouse gasses from energy consumption	0/-	Negative as a result of increased traffic.
16. To reduce vulnerability to flooding		
17. To conserve and enhance biodiversity and geodiversity	+	Conservation of the environment considered
18. To conserve and where appropriate enhance areas of historical and archaeological importance	0/-	Not clearly addressed in this policy.
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+	Conservation of the environment considered

20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Encourages additional employment
21. To revitalise town centres		
22. To encourage efficient patterns of movement in support of economic growth	+	Considers traffic impacts
23. To encourage and accommodate both indigenous and inward investment	+	Employment sites will attract investment.
Assessment Summary	Conservation of the environment is a generic term and not clear what it might cover but probably not conservation of historic interest. Modified policy has become permissive unless specified conditions are met.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	Covered by SP13 Landscape and townscape	

Policy:	DM13 – Conversion and re-use of Redundant Buildings in the Countryside Updated		
Policy summary:	The criteria against which re-use and conversions will be considered including to a residential use.		
SA objective:	Impact:	Comments / Mitigation:	
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	+	Allows reuse of buildings for local services	
6. To offer everybody the opportunity for rewarding and satisfying employment	+	Buildings turned to employment use, local employees encouraged	
7. To meet the housing requirements of the whole community	++	Allows conversions to residential use	
8. To improve the quality of where people live and to encourage community participation	0	Policy protects against negative effects of traffic on local residents but could be a cumulative effect if several developments.	
9. To maintain and where possible improve air quality	0	As above	
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	-	Increased development will produce more waste	

14. To reduce the effects of traffic on the environment	-	Traffic will increase
15. To reduce emissions of greenhouse gasses from energy consumption	-	Traffic will increase
16. To reduce vulnerability to flooding	-/0	Could allow reuse of buildings in flood risks zones.
17. To conserve and enhance biodiversity and geodiversity	+	Survey work required for legally protected species & their habitats
18. To conserve and where appropriate enhance areas of historical and archaeological importance	++	Allows reuse of buildings and alterations that respects traditional design
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+	Contribution to/maintenance of character to local area or enhancement to the immediate setting required by policy
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Some buildings may be converted to employment use in the countryside
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	+	Conversion for employment use may attract investment
Assessment Summary	Reuse of buildings will result in waste being produced. Waste minimisation and recycling needs to be required. (covered bySP1). Traffic will increase as a result of reuse of buildings however the policy seeks to ensure that it is at a level that can be accommodated by the road network and it will consider the cumulative effect if further proposals come forward. No mitigation required. Application of DC 33 Flood risk will ensure that permission is not given to developments in areas at high risk from flooding.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	None	

Policy:	DM14 – Farm Diversification		No change
Policy summary:	Criteria against which proposals relating to farm diversification will be assessed.		
SA objective:	Impact:	Comments / Mitigation:	
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	++	New opportunities for 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	0/-	Potentially could create more traffic, but addressed in detail in the policy and monitoring should be suggested as mitigation measure.
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	-	New activities create waste
14. To reduce the effects of traffic on the environment	+	Impact on road network & access to PRN considered
15. To reduce emissions of greenhouse gasses from energy consumption	0/-	Can have additional lorry movements – increased carbon dioxide emissions.
16. To reduce vulnerability to flooding		
17. To conserve and enhance biodiversity and geodiversity	-	Could have negative effects. Not clearly reflected in this policy. Mitigation – Surveys.
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	+	Creates additional employment.
21. To revitalise town centres		
22. To encourage efficient patterns of movement in support of economic growth	+	Impact on road network & access to PRN considered
23. To encourage and accommodate both indigenous and inward investment	+	Attracts investment.
Assessment Summary	Farms could be used as composting facilities and help reduce waste. Biodiversity not considered see SP12 for mitigation	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	Mitigated by SP12 Biodiversity and geodiversity	

Policy:	DM15 – Agricultural Buildings and Structures	No change
Policy summary:	Proposals for large agricultural buildings including structures for livestock and bulk storage will	

	only be permitted where stated criteria are met.	
SA objective:	Impact:	Comments / Mitigation:
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	0/+	Potential for 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	0/-	Can potentially increase traffic.
10. To maintain and where possible improve water quality	+	Disposal of effluent considered
11. To conserve soil resources and quality	-	Could take greenfield land
12. To use water and mineral resources efficiently, and re-use and recycle where possible		
13. To reduce waste	-	Will increase waste
14. To reduce the effects of traffic on the environment	+	Considers road network and free flow of traffic
15. To reduce emissions of greenhouse gasses from energy consumption	0/-	Could have some additional carbon dioxide emissions due to traffic.
16. To reduce vulnerability to flooding		
17. To conserve and enhance biodiversity and geodiversity	-	Considers AONB and SLA but not biodiversity.
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	++	Considers AONB and SLA
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Allows expansion of agricultural activities
21. To revitalise town centres		
22. To encourage efficient patterns of movement in support of economic growth	+	Considers traffic generation & seeks to maximise location in relation to road network
23. To encourage and accommodate both indigenous and inward investment	+	Will attract investment.

Assessment Summary	Lack of consideration of biodiversity and geodiversity mitigated by SP 31 in part. Waste and Greenfield take not considered.
Secondary, Cumulative or synergistic effects:	
Short/medium/long term effects:	
Mitigation proposals summary:	Mitigation is through applications of other policies.

Policy:	DM16 – Farm Shops		No change
Policy summary:	Positive policy supporting farm shops subject to certain criteria including origin and range of goods sold.		
SA objective:	Impact:	Comments / Mitigation:	
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	+	Recognises farm shops may provide facility not otherwise available to community	
6. To offer everybody the opportunity for rewarding and satisfying employment	+	Encourages local employment opportunities by requiring non-food produce to be locally made.	
7. To meet the housing requirements of the whole community			
8. To improve the quality of where people live and to encourage community participation	+	Facilitates purchase of local produce	
9. To maintain and where possible improve air quality	0	Volume of traffic considered	
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	-	May increase waste	
14. To reduce the effects of traffic on the environment	0/+	Volume of traffic considered and encourages local employment, increasing possibilities of reduced home work - trips.	
15. To reduce emissions of greenhouse gasses from energy consumption	0	Volume of traffic considered	
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	+	Should retain character of farm buildings converted to shop	

19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+	Impact on surrounding area considered & must avoid open countryside
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Opportunities for new employment.
21. To revitalise town centres		
22. To encourage efficient patterns of movement in support of economic growth	+	Retail not related to farm will be directed to higher order settlement
23. To encourage and accommodate both indigenous and inward investment	+	Likely to attract investment.
Assessment Summary	A largely sustainable policy considering traffic issues and local character, though waste not considered.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	None	

Policy:	DM17 – Touring Caravan, Camper vans and Camping Sites Updated	
Policy summary:	Touring Caravan, Camper vans and Camping Sites and extensions to existing sites will be allowed where they meet specified criteria. New sites will not be permitted in the Heritage Coast, adjoining estuaries, exposed parts of the AONB or where they have a materially adverse impact on the landscape.	
SA objective:	Impact:	Comments / Mitigation:
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	0/-	Could have some minor negative effects on local residents.
9. To maintain and where possible improve air quality	0	Free flow of traffic considered
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	0/+	Policy requires siting where mains water available

13. To reduce waste	0/-	Can increase waste but policy requires siting where waste services and mains water available.
14. To reduce the effects of traffic on the environment	0	New/bigger sites will increase traffic but highway safety & free flow considered
15. To reduce emissions of greenhouse gasses from energy consumption	0/-	Traffic will cause some additional carbon emissions.
16. To reduce vulnerability to flooding	-	No consideration given
17. To conserve and enhance biodiversity and geodiversity	+	Protection of adjacent wildlife sites considered
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	++	Not permitted in Heritage Coast, adjoining estuaries, exposed AONB or anywhere where adverse impact on landscape
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Will encourage tourists that will support local businesses
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		
Assessment Summary	Scale of development should be adequately controlled so the impact on communities would be low. Modified policy has made it more positive, although retains the restrictions in designated areas.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	SP 12 Coastal zone and DC33 Flood risk in part mitigate for vulnerability to flooding.	

Policy:	DM18 – Static Holiday Caravans, Cabins and Chalets Updated	
Policy summary:	The locations where such sites will be permitted and the criteria for their assessment. New sites and extensions will not be allowed in the Heritage Coast, adjoining estuaries, exposed parts of the AONB or where they have a materially adverse impact on the landscape.	
SA objective:	Impact:	Comments / Mitigation:
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	0/-	Could have some minor negative effects on local residents.
9. To maintain and where possible improve air quality	0	Free flow of traffic considered
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	-	Can increase waste.
14. To reduce the effects of traffic on the environment	0	New/bigger sites will increase traffic but highway safety & free flow considered
15. To reduce emissions of greenhouse gasses from energy consumption	0/-	Traffic will cause some additional carbon emissions.
16. To reduce vulnerability to flooding	-	No consideration given
17. To conserve and enhance biodiversity and geodiversity	-	No consideration given
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	++	Not permitted in Heritage Coast, adjoining estuaries, exposed AONB or anywhere where adverse impact on landscape
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Will encourage tourists that will support local businesses
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		
Assessment Summary	Waste not considered. SP12 & DM27 provides some protection to bio and geo diversity. SP 30 Coastal zone and DM28 Flood risk in part mitigate for vulnerability to flooding. Modified policy has made it more positive, although retains the restrictions in designated areas.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	None	

Policy:	DM19 – Parking Standards	No change
Policy summary:	Reference to standards contained within supplementary planning guidance and exceptions	

	such as town centres.	
SA objective:	Impact:	Comments / Mitigation:
1. To improve the health of the population overall	+	Encourages investment in cycling and walking measures instead of parking.
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	+	Encourages investment in cycling, walking, public transport and public car parking, increasing choice of access.
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	+	Increasing choice of access could improve satisfaction with local area
9. To maintain and where possible improve air quality	-	Parking provision will encourage private car usage
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	-	Parking provision will encourage private car usage
15. To reduce emissions of greenhouse gasses from energy consumption	-	Parking provision will encourage private car usage; and therefore energy consumption and emissions
16. To reduce vulnerability to flooding		
17. To conserve and enhance biodiversity and geodiversity	-/0	Minor impacts from land take
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	+/0	Planned provision of parking and other forms of access will help bring people into town centres
22. To encourage efficient patterns of movement in support of economic growth	+	Planned provision of parking and other forms of access will contribute to efficient movement patterns.

23. To encourage and accommodate both indigenous and inward investment		
Assessment Summary	Negative effects of increased traffic flows will be considered when looking at the suitability of the development for its proposed location.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	None	

Policy:	DM20 – Travel Plans		No change
Policy summary:	Need for green travel plans as part of proposals with significant traffic generation.		
SA objective:	Impact:	Comments / Mitigation:	
1. To improve the health of the population overall	+	Encourages cycling and walking	
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	+	Improves facilities for cycling and walking	
5. To improve access to key services for all sectors of the population	+	Links to public transport are mentioned in the policy.	
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	+	Encourages investment in sustainable transport	
9. To maintain and where possible improve air quality	++	Seeks to reduce traffic	
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	++	Decrease the amount of traffic.	
15. To reduce emissions of greenhouse gasses from energy consumption	+	Decreased traffic will reduce the carbon release.	
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	+	Encourages range of modes of transport and links between them.
23. To encourage and accommodate both indigenous and inward investment		
Assessment Summary	No significant negative impacts	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	None	

Policy:	DM21 – Design: Aesthetics Updated	
Policy summary:	Poor design and layout and proposals which seriously detract from the character of the area will not be permitted. Sets out criteria that need to be met. Supports Conservation of energy and has regard to SPDs.	
SA objective:	Impact:	Comments / Mitigation:
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	++	Encourages good design & fit with surroundings and expected to establish a strong sense of place.
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	++	Encourages conservation of energy and use of alternative sources of energy
16. To reduce vulnerability to flooding		
17. To conserve and enhance biodiversity and geodiversity	++	Layouts should protect ecological value & enhance habitat creation
18. To conserve and where appropriate enhance areas of historical and archaeological importance	++	Alterations & extensions should respect period & Architectural characteristics
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	++	Layouts should incorporate existing site features of landscape
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area		
21. To revitalise town centres	+	Where no varied townscape quality of design should create new point of interest
22. To encourage efficient patterns of movement in support of economic growth		
23. To encourage and accommodate both indigenous and inward investment	+	Good design can encourage investment
Assessment Summary	A very sustainable policy, particularly with regard to conserving local character. Modified policy phases it more positively.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	None	

Policy:	DM22 – Design: Function Updated		
Policy summary:	Proposals should make provision for their functional requirements. Support water conservation measures.		
SA objective:	Impact:	Comments / Mitigation:	
1. To improve the health of the population overall	0/+	Requires provision of cycling and footways for walking	
2. To maintain and improve levels of education and skills in the population overall			
3. To reduce crime and anti-social activity	++	Need for crime prevention, secure design, surveillance, lighting & visibility recognised	
4. To reduce poverty and social exclusion	+	Requires safe & convenient access for people with disabilities	

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	+	Seeks to ensure good design for access, parking, emergency vehicles, waste collection & crime prevention
9. To maintain and where possible improve air quality		
10. To maintain and where possible improve water quality	++	Strongly encourages permeable soakaways
11. To conserve soil resources and quality		
12. To use water and mineral resources efficiently, and re-use and recycle where possible	++	Strongly encourages water conservation measures such as grey water & efficiency devices
13. To reduce waste		
14. To reduce the effects of traffic on the environment	+	Makes provision for public transport, cars, cyclists & parking
15. To reduce emissions of greenhouse gasses from energy consumption		
16. To reduce vulnerability to flooding	+	Encourages permeable soakaways
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		
Assessment Summary	A wholly sustainable policy, particularly in terms of health, safety, accessibility and water conservation. Modified policy is phased more positively. Supporting text recognises that changes in practice regarding recycling of household waste and the need to accommodate larger bin storage areas is an example of functional design.	
Secondary, Cumulative or synergistic effects:	Provision of storage areas to enable sorting of waste and recycling will encourage recycling although it will not reduce the overall amount of waste.	
Short/medium/long term effects:		
Mitigation proposals summary:	None required	

Policy:	DM23 – Residential Amenity Updated	
Policy summary:	Development will be acceptable where it would not cause an unacceptable loss of amenity and sets out the factors that will be considered.	
SA objective:	Impact:	Comments / Mitigation:
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	+	Needs of safety & security considered
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	+	Allows no loss of amenity (eg privacy, daylight) and will not allow location in an area subject to noise issues.
9. To maintain and where possible improve air quality	+	No loss of air quality accepted
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		
Assessment Summary	No mitigation needed.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	None	

Policy:	DM24 – Sustainable Construction		Updated
Policy summary:	Sets out the sustainable construction standards development needs to meet. Residential development needs to meet the full Code for Sustainable Homes. CSH certificates will be required.		
SA objective:	Impact:	Comments / Mitigation:	
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	0/-	May discourage developers	
8. To improve the quality of where people live and to encourage community participation			
9. To maintain and where possible improve air quality	+	Renewable or low-carbon energy generation required	
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	++	Water and minerals must be used appropriately and efficiently. Water conservation measures must be demonstrated	
13. To reduce waste			
14. To reduce the effects of traffic on the environment			
15. To reduce emissions of greenhouse gasses from energy consumption	+	New developments are expected to maximise energy efficiency and energy conservation to reduce overall energy demand and requires renewable or low carbon in some cases . However will be prepared to consider information on the viability of a scheme and reduce the building standards rating if necessary.	
16. To reduce vulnerability to flooding	+	Size of impermeable areas to be minimised. Possibility for different solutions in areas of particular flood risk noted.	

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	+	Prepared to consider information on the viability of a scheme and reduce the building standards rating if necessary.
Assessment Summary	A sustainable policy that has been modified to focus on standards for residential homes. Now no specific requirements for employment development to meet.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	None. Carbon reduction for employment development is covered in the building regulations.	

Policy:	DM25 – Art Updated	
Policy summary:	Encourages the provision of publicly accepted art on large developments.	
SA objective:	Impact:	Comments / Mitigation:
1. To improve the health of the population overall		
2. To maintain and improve levels of education and skills in the population overall	0/+	Encourages an outlet for art using local skills
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	+	Promotes public involvement in public art to achieve a sense of place and identity. Also ensures maintenance.
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	0/+	Art can help celebrate and articulate local traditions and personalities
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	0/+	Art can help celebrate and articulate local traditions and personalities
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		
Assessment Summary	No significant negative impacts. Modified policy seeks rather than requires provision of new art in major developments.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:	Long term upkeep of art secured.	
Mitigation proposals summary:	None	

Policy:	DM26 – Lighting	No change
Policy summary:	Minimise light pollution	
SA objective:	Impact:	Comments / Mitigation:
1. To improve the health of the population overall	+	Ensures no glare or light spillage onto highways which could dazzle, distract or disorientate road users.
2. To maintain and improve levels of education and skills in the population overall		
3. To reduce crime and anti-social activity	+	Permitted for security reasons
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	+/-	Community benefit but may be negative impact on individual householders.
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	+	Allowing lighting increases energy use. However aims for minimum needed and supporting text says energy efficient light bulbs should be used where possible.
16. To reduce vulnerability to flooding		
17. To conserve and enhance biodiversity and geodiversity	-	Lighting could effect some species but policy only concerned with areas of nature conservation importance.
18. To conserve and where appropriate enhance areas of historical and archaeological importance	+/-	Lighting historic buildings could enhance quality of place, on other buildings could have negative impact.
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+	Could enhance quality of place and policy wording ensures protection of landscape
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		
Assessment Summary	Policy wording now encourages the minimum amount of lighting and has regard to nature conservation and landscape impact.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	None	

Policy:	DM27 – Biodiversity and Geodiversity Updated	
Policy summary:	New development needs to protect or enhance biodiversity and geodiversity. Development in designated environmental areas will only be permitted if mitigation and compensation measures reduces the net impacts so they don't outweigh the benefits of development or where exceptional circumstances under the EU Habitats are met.	
SA objective:	Impact:	Comments / Mitigation:
1. To improve the health of the population overall	0/+	Public access to green space improved, thereby encouraging exercise

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	+	Increases land managed for ecological interest & aims to increase public access to sites.
9. To maintain and where possible improve air quality		
10. To maintain and where possible improve water quality	0/+	Areas of designated sites allow filtration to water table.
11. To conserve soil resources and quality	+	Protection of designated sites conserves soil resources
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	++	Protects biodiversity and geodiversity and encourages restoration, enhancement and improved site management.. Seeks to minimise fragmentation of habitats and maximise opportunities for connection of natural habitats. Gives adequate control over development whilst recognising that there might be circumstances where planning permission will be given although mitigation and compensation measures will be sought.
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	+	Retention of habitats, and networks of natural habitats will assist landscape conservation.
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	0/+	Protecting biodiversity sites may increase tourism
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		
Assessment Summary	Modified policy encourages protection and enhancement of bio and geodiversity in all environmental designations but recognises that there might be exceptional circumstances where permission for development might be given. Wording of policy now reflects statements made in SP20 regarding the importance of Appropriate Assessment.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:	Long term impact of increased public access could have detrimental effect on biodiversity	
Mitigation proposals summary:	Increased public access proposals need to be assessed for the impact on biodiversity, ie they will require AA if in European designations Overall monitoring of the integrity of the environmental designations will be needed.	

Policy:	DM28 – Flood Risk		No change
Policy summary:	Development should be directed to areas of low flood risk. Otherwise development should proceed in accordance with government guidance in PPS25.		
SA objective:	Impact:	Comments / Mitigation:	
1. To improve the health of the population overall	0/-	Could have negative effect on health of the population.	
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	0/+	Allows development in the flood zones if satisfies sequential test	
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	++	Restricts development in flood zones unless satisfies sequential test	

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		
Assessment Summary	Other than first sentence & last paragraph policy focuses on housing.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	None	

Policy:	DM29 – Telecommunications		Updated
Policy summary:	Installations will be approved where their visual impact is minimised.		
SA objective:	Impact:	Comments / Mitigation:	
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	+	Controls site selection of telecommunication equipment	
9. To maintain and where possible improve air quality	+	Availability of telecommunication equipment can reduce the need for travel	
10. To maintain and where possible improve water quality			
11. To conserve soil resources and quality	++	Seeks restoration of land to former condition if use discontinued	

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	+	Availability of telecommunication equipment can reduce the need for travel
15. To reduce emissions of greenhouse gasses from energy consumption	+	Availability of telecommunication equipment can reduce the need for travel
16. To reduce vulnerability to flooding		
17. To conserve and enhance biodiversity and geodiversity	-	Could impact habitats & species
18. To conserve and where appropriate enhance areas of historical and archaeological importance	+	Requires sympathetic approach/camouflaging in sensitive locations
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+	Requires sympathetic approach/camouflaging in sensitive locations
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	Could facilitate business growth
21. To revitalise town centres		
22. To encourage efficient patterns of movement in support of economic growth	+	Use of telecommunications can reduce need to travel, commute etc
23. To encourage and accommodate both indigenous and inward investment	+	Availability of telecommunications could encourage investment
Assessment Summary	Largely sustainable policy with the only negative mitigated by DM27 Biodiversity and geodiversity. Modified policy is more permissive of development in sensitive locations, now only expecting a sympathetic approach and camouflaging rather than evidence of need.	
Secondary, Cumulative or synergistic effects:	Danger of damage to structures/people due to mistakes made due to camouflaging.	
Short/medium/long term effects:		
Mitigation proposals summary:	None	

Policy:	DM30 – Key Facilities		No change
Policy summary:	Retain key facilities unless use is not and cannot be financially viable and the local community has not come forward with a realistic proposal for the business.		
SA objective:	Impact:	Comments / Mitigation:	
1. To improve the health of the population overall	+	Seeks to protect sports facilities	
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	++	Seeks to retain key facilities	

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	++	Seeks to retain key facilities within community and gives community opportunity to run
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	+	Seeks to retain facilities in existing locations
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+	Seeks to retain facilities in existing locations
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		
Assessment Summary	No negative effects identified.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	None	

Policy:	DM31 – Public Buildings	No change
Policy summary:	Aim to retain public buildings such as schools, churches and halls as community buildings and	

	resist commercial or residential uses.	
SA objective:	Impact:	Comments / Mitigation:
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	0/+	Likely to keep community centres and recreation activity centres providing social activities
4. To reduce poverty and social exclusion	0/+	Likely to keep community centres and recreation activity centres providing local meeting places
5. To improve access to key services for all sectors of the population	0	Likely to keep community centres and recreation activity not improve
6. To offer everybody the opportunity for rewarding and satisfying employment	+	Retains jobs related to such facilities
7. To meet the housing requirements of the whole community	0/-	Restricts change to residential
8. To improve the quality of where people live and to encourage community participation	0	Seeks to maintain services
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	+	Seeks to retain existing uses
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+	Seeks to retain existing uses
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		

Assessment Summary	No major negative effects
Secondary, Cumulative or synergistic effects:	
Short/medium/long term effects:	
Mitigation proposals summary:	None

Policy:	DM32 – Sport and Play Updated	
Policy summary:	New sport and play facilities to be considered in relation to the character of location, scale of settlement, impact on landscape, townscape, access, amenity etc. Loss of sports and play facilities considered in context and need. May require provision or contributions to provision elsewhere to meet shortfall.	
SA objective:	Impact:	Comments / Mitigation:
1. To improve the health of the population overall	++	Recreation facilities would 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	+	Will provide employment opportunities.
7. To meet the housing requirements of the whole community		
8. To improve the quality of where people live and to encourage community participation	++	Facilities may become a valued neighbourhood/community asset.
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	-	Development will produce waste
14. To reduce the effects of traffic on the environment	-/0	Traffic could increase locally, although access provision is considered by the policy
15. To reduce emissions of greenhouse gasses from energy consumption		
16. To reduce vulnerability to flooding		
17. To conserve and enhance biodiversity and geodiversity	-	Access provision, playing fields and new provision will impact upon biodiversity/geodiversity

18. To conserve and where appropriate enhance areas of historical and archaeological importance	+	Considers character of the location
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscape	+	Considers impact on townscape and landscape
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	0/+	May attract investment, as much because the policy will not require contributions if no local need.
Assessment Summary	A broadly sustainable policy. Reference to impact and management of local biodiversity assets in the context of out door provision would strengthen this policy as it would help ensure that the duty to enhance biodiversity is respected.	
Secondary, Cumulative or synergistic effects:	Modified policy suggests a contribution towards indoor or outdoor sport and play space linked to new development will be sought where local need is identified. Developers will favour locations that do not require contributions to save costs, resulting in more efficient use of existing facilities.	
Short/medium/long term effects:		
Mitigation proposals summary:	Mitigated by DM27 Biodiversity and geodiversity. Waste minimisation is required under SP12 climate change.	

Policy:	DM33 – Allotments	No change
Policy summary:	Protection of existing allotments and provision of new sites to meet demand.	
SA objective:	Impact:	Comments / Mitigation:
1. To improve the health of the population overall	++	Provision of allotments provides exercise for owners & encourages growth of fruit & veg.
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	+	Allows those with no garden to have space to grow things
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	0/+	Might add to biodiversity
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		
Assessment Summary	No negative impacts identified.	
Secondary, Cumulative or synergistic effects:		
Short/medium/long term effects:		
Mitigation proposals summary:	None	