

St Edmundsbury Borough  
Council

Local Development Framework

Core Strategy Document

Sustainability Appraisal Report

September 2010



# St Edmundsbury Borough Council Local Development Framework

## Core Strategy Document

## Sustainability Appraisal Report

### Main Report

**September 2010**

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# List of Abbreviations

Term	Meaning/ Definition
AMR	Annual Monitoring Report
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
BVPI	Best Value Performance Indicator
CO <sub>2</sub>	Carbon Dioxide
CS	Core Strategy
CWS	County Wildlife Site
DCLG	Department of Communities and Local Government
DPD	Development Plan Document
IMD	Index of Multiple Deprivation
LDD	Local Development Document
LDF	Local Development Framework
LNR	Local Nature Reserve
LPA	Local Planning Authority
NNR	National Nature Reserve
ODPM	Office of the Deputy Prime Minister
ONS	Office of National Statistics
PDL	Previously Developed Land
PM <sub>10</sub>	Particulate Matter up to 10 micrometers in size
PPG	Planning Policy Guidance Note
PPPs	Plans, Programmes and Policies
PPS	Planning Policy Statement
RIGS	Regionally Important Geological/Geomorphological Site
RPG	Regional Planning Guidance
SA	Sustainability Appraisal
SM	Scheduled Monument
SEA	Strategic Environmental Assessment
SEBC	St Edmundsbury Borough Council
SINC	Site of Importance for Nature Conservation
SPD	Supplementary Planning Document



Term	Meaning/ Definition
SSAG	Suffolk Sustainability Appraisal Group
SSSI	Site of Special Scientific Interest
SUDS	Sustainable Urban Drainage Systems

# Non-Technical Summary

## Overview of Process and Purpose of Sustainability Appraisal

St Edmundsbury Borough Council is preparing a Local Development Framework (LDF) for the Borough, comprising a number of Development Plan Documents (DPDs) that set out the policies and proposals for the development and use of land.

As part of the LDF, the Core Strategy DPD sets out the vision, objectives and key policies for the future development of St Edmundsbury. It will supersede the Replacement St Edmundsbury Borough Local Plan.

This Sustainability Appraisal (SA) Report has been prepared to fulfil the requirements for SA arising from the Planning and Compulsory Purchase Act 2004 and the requirements for Strategic Environmental Assessment (SEA) arising from the SEA Directive. The purpose of SA is to promote sustainable development through better integration of sustainability (economic, social and environmental) considerations in the preparation and adoption of plans. The SEA Directive requires that certain plans and programmes undergo an environmental assessment, due to the likelihood that they will have significant environmental effects once implemented.

A Sustainability Appraisal Report (SA Report) was prepared to accompany the Core Strategy Submission Document. It built on the earlier SA work undertaken by the Council for the SA Scoping Report, the initial SA of the Core Strategy Issues and Options document (March 2008) and the SA Report of the Core Strategy Preferred Options and Strategic Sites document (November 2008).

Following the Examination in Public, the Inspector reported back on 24<sup>th</sup> August 2010 that with the inclusion of a small number of changes to the policies, the document would be found sound. These changes are relatively minor and do not materially alter the substance of the overall plan and its policies. For this reason it is considered that the original Sustainability Appraisal has not been undermined and is still valid. However, where there have been changes to the policies, the original sustainability assessment has been updated as necessary. This update forms Section 10 of this Sustainability Appraisal Report. This report is on the final Core Strategy that takes into account the Inspector's comments and changes.

## The Process Followed

Throughout the report the term SA is used to describe the combined process SA/SEA, which involved four main stages.

### Stage 1

- Identifying other plans, programmes and sustainability objectives which inform and influence the development of the Core Strategy DPD;
- Establishing an understanding of the social, environmental and economic conditions of St Edmundsbury (the baseline);
- Identifying key sustainability issues in the borough;
- Outlining SA objectives against which to later evaluate the Core Strategy DPD policies;
- Gathering consultation feedback on the SA's proposed breadth of coverage and level of detail.

### Stage 2

- An assessment was carried out on a series of spatial strategic options and reported in the initial SA of Core Strategy Issues and Options document (March 2008).

### Stage 3

- An assessment was carried out on a set of draft policies and reported in the SA Report of the Core Strategy Preferred Options and Strategic Sites document (November 2008).

#### Stage 4

- An assessment was carried out of the strategic sites in the SA Report of the Core Strategy Preferred Options and Strategic Sites document (November 2008) and reported (see Section 8 of this report).
- Taking into account the revised policy wording resulting from the Preferred Options consultation, a further iteration of assessment of policies contained in the Core Strategy Submission document was undertaken and reported (see Section 9 of this report).

#### Stage 5

- Following the Inspector's comments (received August 2010) and changes to policy wording a further assessment was undertaken – see Section 10 of this report.

### Appropriate Assessment

There are three European designations relating to nature conservation within the district: Breckland Special Protection Areas, Brecklands Special Areas of Conservation and Waveney and Little Ouse Valley Fens Special Areas of Conservation. There is a requirement for any policies, plans or projects with potential to affect European sites to undergo Appropriate Assessment (AA) under the European Habitats Directive.

Although the requirement and process are separate from that for SA, the two processes have been run in parallel for the Core Strategy DPD.

Appropriate Assessment screening of the Core Strategy DPD concluded that there will be no likely significant effects due to the implementation of the Core Strategy policies. These results are reflected in the SA Report.

### Contents and Main Objectives of the Core Strategy

The St Edmundsbury Core Strategy DPD sets out the Council's vision for future growth, objectives and strategic policy framework that will manage and guide development in the borough over the next twenty years and beyond. The St Edmundsbury vision includes a number of highlights, including ensuring that the distinctive local character, unique local heritage and environmental and cultural assets are retained and enhanced and employment growth and development will produce a prosperous sustainable economy. The Core Strategy objectives are as follows:

- A To meet the communities need for housing in a sustainable way, including specialist and affordable housing, by providing an adequate and continuous supply of land for housing.
- B To secure economic vitality and growth by delivering an adequate and continuous supply of land for employment to meet the needs and demands of different sectors of the economy and reduce the need for out-commuting.
- C To sustain and enhance rural communities by providing, where infrastructure and environmental capacity exists, new housing to grow settlements and safeguard existing rural services while, maintaining and, where possible, improving the rural environment.
- D To maintain and develop leisure, cultural, educational and community facilities, including access to green space, commensurate to the level of housing and employment growth to meet the needs of residents and visitors.
- E To provide opportunities for people to shop for all their needs by sustainable means in thriving and economically viable town, local and district centres.
- F To enable people and goods to move around efficiently and safely to the benefit of the economy and community, with minimum harm to the environment by seeking to reduce car dependency and encouraging more sustainable forms of transport.
- G To maintain and protect built and natural environment and ensure that new development protects and enhances assets of local design, cultural, historic and conservation importance, and character of the landscape.
- H To maintain, protect and enhance the biodiversity, geodiversity and natural environment and seek opportunities to increase the provision of green open space and access to the countryside.

- I To ensure that new development only occurs where there is adequate capacity in existing services, facilities and infrastructure or where this capacity can reasonably be provided.
- J To ensure new development addresses and tackles environmental and sustainability issues including climate change adaptation, carbon emissions reduction, renewable energy provision, recycling, waste reduction and water efficiency.

The Core Strategy contains a set of fifteen policies developed to implement the vision and objectives, as follows:

Policy CS1 St Edmundsbury Spatial Strategy;  
Policy CS2 Sustainable Development;  
Policy CS3 Design and Local Distinctiveness;  
Policy CS4 Settlement Hierarchy and Identity;  
Policy CS5 Affordable Housing;  
Policy CS6 Gypsies, Travellers and Travelling Showpeople;  
Policy CS7 Sustainable Transport;  
Policy CS8 Strategic Transport Improvements;  
Policy CS9 Employment and the Local Economy;  
Policy CS10 Retail, Leisure, Cultural and Office Provision;  
Policy CS11 Bury St Edmunds Strategic Growth;  
Policy CS12 Haverhill Strategic Growth;  
Policy CS13 Rural Areas;  
Policy CS14 Community Infrastructure Capacity and Tariffs; and  
Policy CS15. Plan, Monitor, Manage

## Sustainability Baseline and Key Issues

The borough of St Edmundsbury is located in Western Suffolk. It has borders with Norfolk to the north, Mid Suffolk and Babergh Districts to the east, Essex to the south and Cambridgeshire and Forest Heath District to the west. While administratively St Edmundsbury's links are with Suffolk County Council, increasingly the borough is playing a stronger role in the sub-region of Cambridge because of their common economic and social needs.

The borough has two main towns - Bury St Edmunds to the north and Haverhill to the south. St Edmundsbury is scattered with a large number of villages and small settlements and retains a predominantly rural character despite its industrial nature.

The main sustainability issues identified for St Edmundsbury, which the Core Strategy must address, are briefly summarised below.

### Significant Historic and Future Population Growth

The population has grown significantly over the past two decades (by 16.9%). This growth is expected to continue, particularly with the identification of Bury St Edmunds as a key centre for development and change in the East of England Plan

Historic growth in the number of older people in the Borough (+14.7% over 2002-07) has been significantly higher than that experienced in the East of England as a whole (+8.8% over 2002-07). However, the age profile broadly reflects that of the East of England.

43% of the borough's population live in rural areas. This is an unusually high proportion (23% of England's population live in rural areas), and reflects the largely rural nature of the borough.

### Relatively Low Education and Qualification Attainment

The percentage of the population with no qualifications is more than double the figures for the East of England and England.

### **Localised Deprivation**

Deprivation is increasing, with the borough's Index of Multiple Deprivation (IMD) rank having decreased from 267 in 2004 to 260 in 2007. However, deprivation is not evenly located throughout the borough. The IMD rankings in Haverhill suggest that deprivation in Haverhill is more widespread rather than just concentrated in small pockets.

Furthermore, levels of deprivation in the rural areas have increased both relative to elsewhere in England and in absolute scores.

### **Insufficient Amount of Housing, including Affordable Housing and High Level of Unfit Dwellings**

Although the number of houses built i.e. housing completions in 2006/07, was above the H1 policy target included in the East of England Plan, in previous years the number of completions has not reached the target level.

The uptake of housing benefits has steadily increased since 2003, suggesting that there is insufficient affordable housing available within St Edmundsbury. Furthermore, the housing affordability ratio of the borough has increased steadily since 2003, indicating that there are significant housing affordability problems, particularly as a result of year-on-year increases in house prices.

### **Lack of Accommodation Provision for Gypsies and Travellers**

St Edmundsbury had 2 gypsy and traveller pitches in 2006. The borough is not on track to reach its East of England Policy H4 target which requires 17 pitches by 2011.

### **Earnings below Regional Figures**

Whilst average earnings have increased over recent years, they are still below figures for the East of England and England. Furthermore, median wage figures indicate that there are an above average number of low paid jobs in the borough.

### **Pressure on Rich Biodiversity**

St Edmundsbury contains a number of sites designated for their internationally important ecology. These are:

- Breckland SPA;
- Breckland SAC; and
- Waveney & Little Ouse Valley Fens SAC.

The borough also contains a number of SSSIs, National Nature Reserves, County Wildlife Sites, Local Nature Reserves and Country Parks. Although these sites are considered to be of significant ecological value, their integrity, and the habitats and species that they support are under pressure from the high level of development required in order to meet growth targets set within the East of England Plan.

The majority of the ecological SSSIs in the borough are partly in an unfavourable or mixed condition with 2 of the Borough's 23 SSSIs wholly in an unfavourable and deteriorating condition.

There are a large number of designated BAP habitats and species in Suffolk, many of which will be present in St Edmundsbury. It is important that any permitted development does not detrimentally affect these habitats and species.

### **Pressure on Landscape**

The borough contains 14 landscape types, which are distinct and individually important to the character of the Borough. Development pressures (e.g. suburbanisation, transport and industrial developments, agricultural rationalisation and tourism related development) as a result of past and projected future development within the borough have placed, and are likely to continue to place significant pressure on the landscape of St Edmundsbury.

### **Rich Archaeology and Cultural Heritage**

St Edmundsbury contains over 3,000 listed buildings and a number of historic parks and gardens, scheduled monuments and conservation areas. It is vital that these valuable assets continue to be protected.

## **Pressure on Water Resources**

The level of development required by the East of England Plan, and the population growth that this is likely to cause, will dramatically increase the pressure on existing water resources. These resources are already strained given that the amount of rainfall received in the East of England is significantly less than for other parts of the UK, and is likely to decrease as a result of projected climate change.

## **Potential for Flood Risk**

Whilst a very low proportion of property is at risk of flooding, Bury St Edmunds, Haverhill and many of the borough's villages are located in river valleys. Historic evidence has demonstrated that extreme weather conditions have the potential to cause damage through flooding in these areas.

## **Need to Adapt to a Changing Climate**

The main expected climate changes in the East of England are increases in temperatures (hotter summers, milder winters); increases in seasonality (e.g. dryer summers, wetter winters); and increases in the intensity and frequency of storm events (e.g. extreme rainfall event leading to fluvial /groundwater flooding). St Edmundsbury needs to adapt to these unavoidable consequences of climate change.

## **High Energy Consumption**

Average annual electricity consumption figures show a decrease in domestic electricity consumption but an increase in industrial energy consumption since 2003. Figures also indicate that average domestic and industrial energy consumption in the borough is above both that for the East of England and Great Britain. There are no commercial renewable energy facilities within the borough.

## **High CO<sub>2</sub> Emissions per Capita**

Per capita domestic CO<sub>2</sub> emissions (2.43 tonnes) are slightly lower than regional (2.48 tonnes) and national figures (2.54 tonnes). However, total CO<sub>2</sub> emissions per capita in 2006 (13.44 tonnes) increased from 2005 level (12.10 tonnes) and are higher than regional and national figures, as a result of the industrial nature of the borough. Recent increases in total emissions are likely to be as a result of industrial growth in Haverhill.

## **Need to Preserve Valuable Land and Soil**

The majority of farmland in the borough is either Grade 2 or 3 which are generally considered to be the best and most versatile types of agricultural land. The high level of growth required by the East of England Plan is likely to result in the loss of some of this valuable land.

## **Low Completions on Previously Developed Land**

Whilst St Edmundsbury regularly meets its target of 40% of completions on Previously Developed Land, this target is significantly lower than that for the East of England as a whole. The proportion of completions on Previously Developed Land is likely to decrease in future if St Edmundsbury is to achieve the high level of growth required by the East of England Plan.

## **High traffic volume and reliance on private car**

Traffic volumes within St Edmundsbury are high, with the proportion of journeys to work in the borough being undertaken by car being significantly higher in 2001 than that for the East of England and England. The proportion of journeys to work undertaken by public transport in the borough is significantly lower than that for the East of England and England. Available data suggests that the distance that residents commute to work is significantly higher than the national mean.

## **Changing Employment Sectors**

The proportion of the population employed in agriculture and manufacturing is declining. There are major differences in prominent employment sectors within the borough. Haverhill is industrial in nature with more than three times the proportion of manufacturing employment compared to Bury St Edmunds which is dominated by public sector employment, accounting for almost one third of total employment.

## Sustainability Appraisal Framework

The Sustainability Appraisal Framework is a key tool in completing the SA as it allows the assessment of the effects arising from the Core Strategy proposals in key areas in a systematic way. The St Edmundsbury Core Strategy SA Framework is based on the SEA Framework prepared by the Suffolk Sustainability Appraisal Group for all Suffolk authorities but it has been adapted to reflect the specific characteristics of St Edmundsbury. The adapted Core Strategy SA objectives are shown below:

### **Social**

1. To improve the health of the population overall and reduce health inequalities
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

### **Environmental**

9. To improve water and air quality
10. To conserve soil resources and quality
11. To use water and mineral resources efficiently, and re-use and recycle where possible
12. To reduce waste
13. To reduce the effects of traffic on the environment
14. To reduce contributions to climate change
15. To reduce vulnerability to climatic events
16. To conserve and enhance biodiversity and geodiversity
17. To conserve and where appropriate enhance areas of historical and archaeological importance
18. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes

### **Economic**

19. To achieve sustainable levels of prosperity and economic growth throughout the plan area
20. To revitalise town centres
21. To encourage efficient patterns of movement in support of economic growth
22. To encourage and accommodate both indigenous and inward investment

## Compatibility between Core Strategy and SA Objectives

Initial work on the Core Strategy DPD identified a set of objectives to achieve the overall vision for the area. Each of these objectives was evaluated in terms of its compatibility with each of the SA objectives above.

The results of the compatibility assessment indicated that the overall compatibility between the initial set of the Core Strategy Objectives and the SA Objectives was relatively good. This was particularly true of the compatibility with the social and economic dimensions of sustainability. In contrast, there was a considerable amount of uncertainty with regards to the environmental objectives, which required addressing through the translation of the Core Strategy objectives into future policies which take fully into account environmental considerations.



## Plan Issues and Options

Five main strategic options for the spatial strategy for the borough were set out in Part 5 of the Core Strategy Issues and Options document published in March 2008. These were:

- Option 1: Business as usual – this maintains the hierarchy in the Replacement St Edmundsbury Borough Local Plan 2016 (adopted in 2006), to determine the scale of new development appropriate for each location.
- Option 2: Urban Growth – under this option new development would be directed towards Bury St Edmunds and Haverhill and a slowing down in the recent rates of development in the rural settlements.
- Option 3: Regeneration of Haverhill – the majority of new development would be split equally between Bury St Edmunds and Haverhill, and development in the rural areas would be much lower than recently experienced.
- Option 4: Rural Development - under this option significantly more development would take place in the settlements outside Bury St Edmunds and Haverhill than at present. Development rates in Haverhill would reduce compared with the previous ten years, but growth rates in Bury St Edmunds would continue at the rate achieved over the same period, in order to reflect the strategy of the Draft East of England Plan.
- Option 5: New Settlement – this option proposes a new settlement of at least 3,000 homes plus a commensurate level of jobs, services and community facilities to be constructed in the latter years of the LDF period. Some growth in the existing towns and villages would be required in the interim period to ensure that housing and the economy remain buoyant, but there would be a lower rate of development in those settlements in parallel with the construction of a new settlement.

The assessment revealed varying degrees of sustainability across the options. Key general findings which emerged from the assessment were:

- The assessment results show that Options 2 and 3 perform well in the sustainability terms with no significant differences between them, as both options direct further growth to Bury St Edmunds and Haverhill and slow down and restrict development in the rural areas. The main benefits that these two options are expected to deliver include better opportunities for development on previously developed land, the provision of good cycle and pedestrian links to employment, services and facilities, the provision of education and skills training, the efficient use of energy, etc.
- Option 1 is a business as usual scenario, which supports a more disperse growth by directing development to Bury St Edmunds and also allowing development in the rural service centres. This option is also expected to deliver positive effects against the SA objectives overall, although of lower level than Options 2 and 3.
- Option 5 supporting the development of new settlement was also identified as being likely to deliver beneficial effects overall. The main advantages associated with this option include the use of more sustainable modes of transport, accessibility to key services and ability to provide homes for all, and also by providing opportunities to adopt sustainable development measures throughout the development and from the outset. However, disadvantages of this option are loss of significant amount of greenfield land and potentially diverting from opportunities in the existing settlements.
- Option 4, promoting growth in the countryside scores the lowest against the SA objectives due to such effects as restricting access to the key services and facilities with little or no scope for employment, exacerbating the reliance on the private car, loss of green space and natural habitats and inability accommodate the required level of growth and meet the housing needs of the whole community. Positive effects of helping avoid the demise of rural facilities are likely to be outweighed by the listed negative effects.



Although the Council is ultimately held responsibility for selecting the preferred option for each strategic policy, the SA assessment differentiated the various policy options for each objective and helped to identify the most sustainable options.

## Development of Strategic Sites

Strategic sites identified in the Core Strategy Preferred Options and Strategic Sites document (November 2008) were subject to an assessment in order to determine their performance in sustainability terms, with reference to social, environmental and economic factors. These sites are located around Bury St Edmunds and Haverhill.

## Assessment of Plan Policies

Drawn from the options that had previously been identified as being the most sustainable, the Core Strategy policies seek to implement the Core Strategy vision and objectives. There are 15 policies in total which have been assessed in various iterations of assessment (see sections 9 and 10) in order to predict and evaluate the nature (positive, negative or neutral), scale (significant or non-significant) and timeframe (short-term, medium-term or long-term) of the social, environmental and economic effects.

The final assessment (see table 10.2) undertaken as a result of the Inspector's comments indicates that the Core Strategy document performs with mixed results against the SA framework, but on the whole achieves a balance of positive significant effects. The Core Policies offer potentially significant positive effects on all SA social and economic objectives, therefore addressing suitably the issues associated with health, education, crime and fear of crime, poverty and social exclusion, access to key services, employment, housing requirements, revitalisation of town centres, economic growth and investment. However, a range of both significant positive and negative effects have also identified with regard to the environmental SA objectives. The predicted negative effects are associated with Policies aiming to accommodate the provision of approximately 10,000 new homes and required infrastructure in St Edmundsbury, including Greenfield land take, which will have negative effects on the environment. Specifically, the assessment has identified negative effects of varying scale and significance on water and air quality, soils resources and quality, mineral resources, waste, effects of traffic on the environment, climate change, vulnerability to climatic events, biodiversity, heritage and local landscape and townscape.

## Mitigation

Although the Core Strategy will have a positive significant effect in sustainability terms overall, certain policies have the potential for negative significant effects relating primarily to the impact of physical development on the environment.

Measures to prevent, reduce or offset any significant adverse effects have been proposed on a policy by policy basis in this SA Report, most of which involve further outlining during the preparation of related Development Plan Documents (DPDs), Supplementary Planning Documents (SPDs), Area Action Plans (AAPs) and project-level Environmental Impact Assessment.

## Monitoring

Recommendations for the monitoring of significant sustainability effects of the implementation of the Core Strategy DPD have been set out in this SA Report.

The SA guidance recommends SA monitoring to be incorporated into Local Authority's existing monitoring arrangements. In accordance with Regulation 48 of the Town and Country Planning Regulations, the Council is required to prepare an Annual Monitoring Report (AMR) to assess the implementation of the Local Development Framework and the extent to which core policies are being achieved and to identify any changes if a policy is not working or if the targets are not met. The Council will integrate the monitoring of the Core Strategy's significant sustainability effects in these wider monitoring arrangements.

## Conclusions

The Core Policies within the St Edmundsbury Core Strategy DPD meet to a large extent the range of sustainability objectives identified in the SA framework, on the whole achieving a balance of positive significant effects.

Recommendations have been made previously on earlier iterations of the policies through the SA and AA processes. Many of these recommendations have been taken forward and are reflected in the finalised version of the Core Strategy Policies, to ensure that they deliver sustainable development. Any remaining negative effects from development can be minimised to acceptable levels by undertaking Environmental Impact Assessment of projects or schemes arising from the implementation of the Core Strategy. The policies have also been changed as a result of earlier consultation exercises and more lately as a result of Inspector's comments.

Table 10.1 presents the set of the finalised policies included in the Core Strategy following Inspector's comments. On the whole, refinements to the policies following the Inspector's comments have further enhanced the sustainability performance of St Edmundsbury Core Strategy by providing clarification and further detail. However, in the case of Policy CS2, the expectation for BREEAM and Code for Sustainable Homes Levels above national requirements has been removed. The policy will still have positive environmental effects; however, these are less positive than predicted for previous iterations of the policy.

# 1. Introduction

## Local Development Framework

- 1.1 Local Development Frameworks (LDFs) are to be prepared by Local Planning Authorities (LPAs). LDFs comprise a portfolio of Local Development Documents (LDDs). LDDs may be divided into three categories:
- **Development Plan Documents (DPDs)** - subject to independent examination and have the weight of development plan status. DPDs form part of the statutory development plan together with the Regional Spatial Strategy (RSS) prepared by the Government Office, in this case for the East of England (GO-East).
  - **Supplementary Planning Documents (SPDs)** - not subject to independent examination and do not have development plan status. SPDs build upon policy and the guidance specified in DPDs. SPDs cannot be used to allocate land.
  - **Statement of Community Involvement (SCI)** - outlines how the LPA will consult with key stakeholders and the community. The SCI is subject to independent examination.
- 1.2 The St Edmundsbury LDF comprises a number of Development Plan Documents (DPDs) that set out the policies and proposals for the development and use of land. At present the main DPD documents that will be produced as part of the St Edmundsbury LDF are:
- A Core Strategy: This will provide the vision, objectives and key policies for the future development of St Edmundsbury;
  - Site Specific Allocations: These will identify and protect land to meet the future needs of St Edmundsbury; and
  - Development Management Policies: These are the detailed policies against which planning applications will be determined.

## St Edmundsbury Core Strategy

- 1.3 The St Edmundsbury Core Strategy DPD sets out the Council's vision for future growth, objectives and strategic policy framework that will manage and guide development in the borough over the next twenty years and beyond. The Core Strategy lists the policies required to implement this vision, which will be supported by the Site Specific Allocations and Development Control Policies DPDs. In addition to these policies, the Core Strategy identifies broad locations for growth in Bury St Edmunds and Haverhill, the development of which is proposed in order to meet the significant housing growth targets set out in the East of England Plan (RSS) adopted in May 2008.
- 1.4 In accordance with St Edmundsbury vision, by 2031 the borough will:
- 'remain a vibrant part of Suffolk and a region where the distinctive local character, unique local heritage and environmental and cultural assets are retained and enhanced for the enjoyment of all
  - The Borough will be a safe place to live with strong communities
  - Employment growth and development will produce a prosperous sustainable economy including sustainable tourism
  - All residents of the Borough will have an equal opportunity to access services, jobs and leisure facilities to maximise their potential to live and work
  - A hierarchy and network of town and village centres will grow and develop to provide a wide range of services in a good environment and accessible to all, appropriate to the size of settlement.

- The Borough will respond to the challenge of delivering growth in a manner that does not just respect the heritage and culture of St Edmundsbury but actually strives to enhance them in an environmentally sustainable way
- The natural and built environment and local biodiversity of the Borough will be protected and where possible enhanced to increase access to the countryside and the provision of green open space.
- The challenges of climate change will be addressed to ensure that the specific threats that Suffolk faces are mitigated but that other adaptations are also made such as an increase in renewable energy and water efficiency and an active decrease in carbon emissions.
- All new development will respect the Brecks Special Protection Area, Special Areas of Conservation and Sites of Special Scientific Interest.
- Bury St Edmunds and Haverhill will be the cultural and economic hearts of the Borough with strong, sustainable links to the surrounding key services centres, villages and countryside.”

1.5 It is essential that the Core Strategy provides measurable objectives (termed strategic aims) designed to implement the Core Strategy spatial vision. They set the context for spatial policies and proposals in the Local Development Framework. The Core Strategy adopts strategic objectives for planning in the borough from the recent Replacement St Edmundsbury Borough Local Plan (A to I), with some amendments, and adds an additional objective (J) to address climate change issues. The Core Strategy strategic objectives are detailed in Table 1.1.

**Table 1.1 – Core Strategy Strategic Objectives**

<b>Strategic Objectives</b>	
Strategic Objective A	To meet the communities need for housing in a sustainable way, including specialist and affordable housing, by providing an adequate and continuous supply of land for housing.
Strategic Objective B	To secure economic vitality and growth by delivering an adequate and continuous supply of land for employment to meet the needs and demands of different sectors of the economy and reduce the need for out-commuting.
Strategic Objective C	To sustain and enhance rural communities by providing, where infrastructure and environmental capacity exists, new housing to grow settlements and safeguard existing rural services while, maintaining and, where possible, improving the rural environment.
Strategic Objective D	To maintain and develop leisure, cultural, educational and community facilities, including access to green space, commensurate to the level of housing and employment growth to meet the needs of residents and visitors.
Strategic Objective E	To provide opportunities for people to shop for all their needs by sustainable means in thriving and economically viable town, local and district centres.
Strategic Objective F	To enable people and goods to move around efficiently and safely to the benefit of the economy and community, with minimum harm to the environment by seeking to reduce car dependency and encouraging more sustainable forms of transport.
Strategic Objective G	To maintain and protect built and natural environment and ensure that new development protects and enhances assets of local design, cultural, historic and conservation importance, and character of the landscape.
Strategic Objective H	To maintain, protect and enhance the biodiversity, geodiversity and natural environment and seek opportunities to increase the

Strategic Objectives	
	provision of green open space and access to the countryside.
Strategic Objective I	To ensure that new development only occurs where there is adequate capacity in existing services, facilities and infrastructure or where this capacity can reasonably be provided.
Strategic Objective J	To ensure new development addresses and tackles environmental and sustainability issues including climate change adaptation, carbon emissions reduction, renewable energy provision, recycling, waste reduction and water efficiency.

- 1.6 The Core Strategy Submission Document contains a set of fifteen policies developed to implement the vision and objectives, titled as follows:

Policy CS1 St Edmundsbury Spatial Strategy;  
 Policy CS2 Sustainable Development;  
 Policy CS3 Design and Local Distinctiveness;  
 Policy CS4 Settlement Hierarchy and Identity;  
 Policy CS5 Affordable Housing;  
 Policy CS6 Gypsies, Travellers and Travelling Showpeople;  
 Policy CS7 Sustainable Transport;  
 Policy CS8 Strategic Transport Improvements;  
 Policy CS9 Employment and the Local Economy;  
 Policy CS10 Retail, Leisure, Cultural and Office Provision;  
 Policy CS11 Bury St Edmunds Strategic Growth;  
 Policy CS12 Haverhill Strategic Growth;  
 Policy CS13 Rural Areas;  
 Policy CS14 Community Infrastructure Capacity and Tariffs; and  
 Policy CS15. Plan, Monitor, Manage

- 1.7 Additional policies which will shape the way in which development in St Edmundsbury is undertaken, and which will ensure that future development is as sustainable as possible, will be set out in SEBC's Development Management DPD.

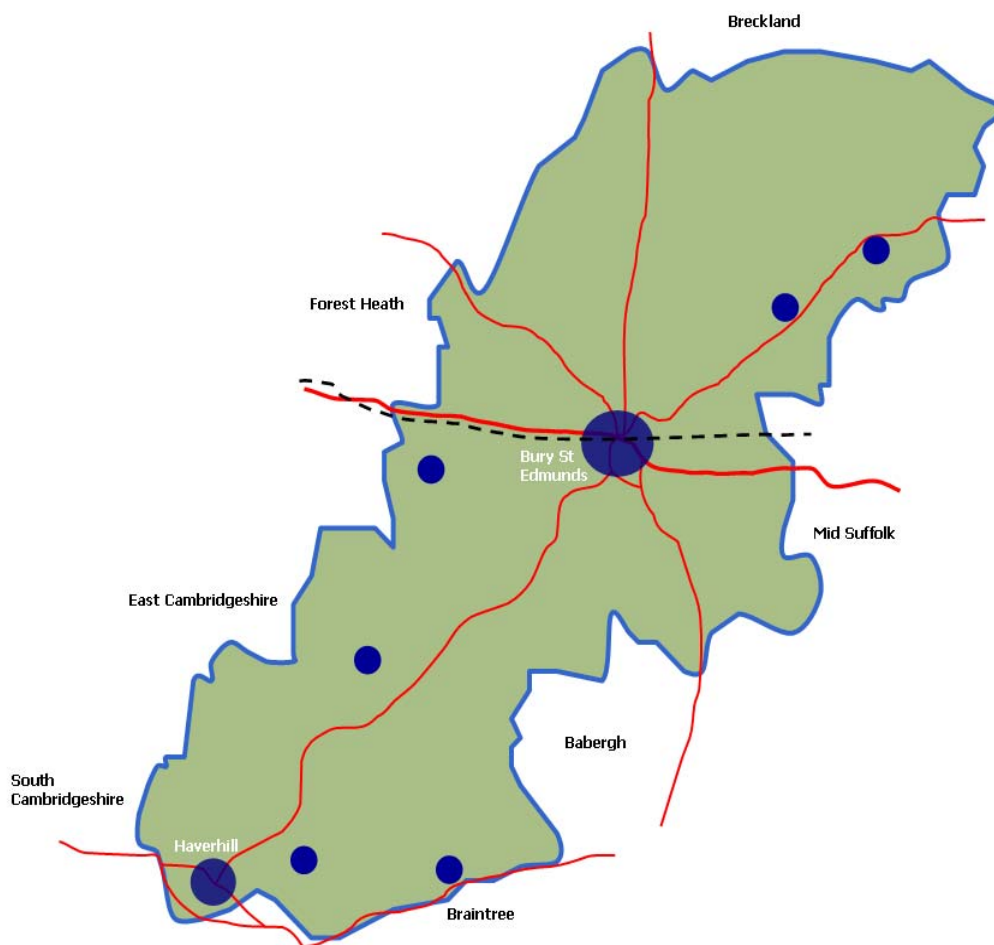
- 1.8 The Core Strategy also identifies the broad locations for the future strategic growth in Bury St Edmunds and Haverhill. These are sites that will primarily be capable of delivering a mix of uses including homes, jobs, community and social facilities that will be developed over a longer period. The government describe strategic sites as those that are "central to the achievement of the strategy." The Area Action Plans for Bury St Edmunds and Haverhill will provide more detail about the boundaries and mix of uses to be accommodated in these locations.

## Geographical Area

- 1.9 The borough of St Edmundsbury is located in Western Suffolk. It has borders with Norfolk to the north, Mid Suffolk and Babergh Districts to the east, Essex to the south and Cambridgeshire and Forest Heath District to the west. While administratively St Edmundsbury's links are with Suffolk County Council, increasingly St Edmundsbury is playing a stronger role in the sub-region of Cambridge because of their common economic and social needs.

- 1.10 The borough has two main towns Bury St Edmunds to the north and Haverhill to the south. St Edmundsbury is scattered with a large number of villages and small settlements and retains a predominantly rural character.
- 1.11 The geographical boundary of the borough is shown in Figure 1.1.
- 1.12 This SA is primarily concerned with effects arising from implementation of the St Edmundsbury Core Strategy. Although the SA will mostly focus on effects within St Edmundsbury Borough, it will also consider the effects of the policies on surrounding areas, the region, and on national and global issues where deemed relevant.

Figure 1.1 – St Edmundsbury Borough



## Requirement for Sustainability Appraisal

- 1.13 Under the regulations<sup>1</sup> implementing the provisions of the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is required for all Local Development Documents (LDDs). The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 removed the requirement for SA for Supplementary Planning Documents (SPD), although LPAs are still required to screen their SPDs in relation to both SA and SEA. The purpose of SA is to promote sustainable development through better integration of sustainability considerations in the preparation and adoption of plans. The regulations stipulate that SA of LDDs should meet the requirements of the SEA Directive.
- 1.14 Planning Policy Statement 1 (PPS1) describes Sustainability Appraisal in Paragraph 9 of Annex B:
- ‘A Sustainability Appraisal is intended to assess the impact of plan policies from an environmental, economic and social perspective. It is intended to test the performance of a plan against the objectives of sustainable development and thereby provide the basis for its improvement. Guidance on carrying out the Sustainability Appraisal will show how they can comply with the requirements of the Strategic Environmental Assessment (SEA) Directive’.*
- 1.15 SA thus helps planning authorities to fulfil the objective of contributing to the achievement of sustainable development in preparing their plans.
- 1.16 There are many definitions of sustainable development. However, the most commonly used and widely accepted is that coined by the World Commission of Environment and Development in 1987 as:
- ‘Development which meets the needs of the present without compromising the ability of future generations to meet their own needs.’*
- 1.17 The UK Government’s Sustainable Development Strategy ‘Securing the Future’, published in March 2005, outlines a set of shared UK principles which will be used to achieve the goal of sustainable development. The guiding principles have been agreed by the UK government, Scottish Executive, Welsh Assembly Government and the Northern Ireland Administration. They bring together and build on the various previously existing UK principles to set out an overarching approach. The five guiding principles will form the basis for policy in the UK. For a policy to be sustainable, it must respect all five of these principles in order to integrate and deliver simultaneously sustainable development:
- **Living within environmental limits** – respecting the limits of the planet’s environment, resources and biodiversity to improve our environment and ensure that the natural resources needed for life are unimpaired and remain so for future generations;
  - **Ensuring a Strong, Healthy and Just Society** – meeting the diverse needs of all people in existing and future communities, promoting personal wellbeing, social cohesion and inclusion, and creating equal opportunity for all;
  - **Achieving a Sustainable Economy** – Building a strong, stable and sustainable economy which provides prosperity and opportunities for all, and in which environmental and social costs fall on those who impose them (polluter pays); and efficient resource use incentivised;
  - **Promoting Good Governance** – Actively promoting effective, participative systems of governance in all levels of society – engaging people’s creativity, energy and diversity;
  - **Using Sound Science Responsibly** – Ensuring policy is developed and implemented on the basis of strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle) as well as public attitudes and values.

<sup>1</sup> Town and Country Planning (Local Development) (England) Regulations 2004. The Regulations came into force on 28 September 2004.



- 1.18 St Edmundsbury Borough Council is committed to sustainable development, placing the ideologies which underpin it at the centre of its activities. Sustainable development in St Edmundsbury is defined as that which balances the needs of a growing economy with protecting the built and natural environment.
- 1.19 The importance of sustainability for St Edmundsbury is demonstrated by the formation in 2006 of a Sustainable Development Panel within the Council who are specifically concerned with sustainability issues within the borough. This work is supported by that of the Suffolk Sustainability Appraisal Group (SSAG), whose advice and opinion has been sought throughout the Sustainability Appraisal process. This group, whose role is to monitor a range of social, economic and environmental indicators in order to assess Suffolk's progress towards sustainable development, is a partnership between Suffolk County Council, the seven district/borough councils which comprise Suffolk and other statutory organisations.

## Requirement for Strategic Environmental Assessment

- 1.20 The EU Directive 2001/42/EC on the assessment of effects of certain plans and programmes on the environment (the 'SEA Directive') came into force in the UK on 20 July 2004 through the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.21 The Directive applies to a variety of plans and programmes including those for town and country planning and land use. The Local Development Framework is prepared and adopted by an authority at the local level and is required by legislative provisions. It is prepared for the purposes of town and country planning/land use and is likely to have significant effects on the environment. It is therefore the case that the DPDs and SPDs prepared as part of the St Edmundsbury LDF are required to be subject to environmental assessment, under the SEA Directive.
- 1.22 The overarching objective of the SEA Directive is:
- "To provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans... with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans... which are likely to have significant effects on the environment." (Article 1)*
- 1.23 SEA is an iterative assessment process which plans and programmes are now required to undergo as they are being developed, to ensure that potential significant environmental effects arising from the plan/programme are identified, assessed, mitigated and communicated to plan-makers. SEA also requires the monitoring of significant effects once the plan/programme is implemented.
- 1.24 The SEA Directive and the SEA Regulations state that the SEA must consider the following topic areas:
- Biodiversity;
  - Population;
  - Human Health;
  - Flora and Fauna;
  - Soil;
  - Water;
  - Air;
  - Climatic Factors;
  - Material assets;
  - Cultural heritage, including archaeological and built heritage;
  - Landscape;



- And the interrelationship between these factors.

## The SA Process

- 1.25 The requirements to carry out SA and SEA are thus distinct, but guidance<sup>2</sup> from the Office for the Deputy Prime Minister (ODPM) states that it is possible to satisfy both through a single appraisal process and provides a methodology for doing so.
- 1.26 According to the same guidance, the main stages in the SA process are as follows:
- **Stage A** – Setting the context and objectives, establishing the baseline and deciding on scope;
  - **Stage B** – Developing and refining options and assessing effects;
  - **Stage C** – Preparing the Sustainability Appraisal Report;
  - **Stage D** – Consultation on the plan and the Sustainability Appraisal Report; and
  - **Stage E** – Monitoring the significant effects of implementing the plan.
- 1.27 The ODPM's guidance emphasises that SA is an iterative process which identifies and reports on the likely significant effects of the plan and the extent to which its implementation will achieve the social, environmental and economic objectives by which sustainable development can be defined. The intention is that SA is fully integrated into the plan making process from the earliest stages, both informing and being informed by it. The guidance also sets out a requirement for the preparation of the following reports:
- **Scoping Report** (documenting Stage A work) which should be used for consultation on the scope of the SA;
  - **Sustainability Appraisal Report** (documenting Stages A and B work) which should be used in the public consultation on the Preferred Options version of the draft DPD. The SA Report fully encompasses the requirement to produce an Environmental Report under the SEA Directive.
- 1.28 Table 1.2 sets out the various SA stages, tasks and relationships with the DPD preparation, as set out in the ODPM guidance.

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<sup>2</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, November 2005

**Table 1.2 - Incorporating SA in the DPD Preparation Process**

<b>DPD Stage 1: Pre-production – Evidence Gathering</b>
<b>SA Stages and tasks</b>
Stage A: Setting the context and objectives, establishing the baseline and deciding upon the scope A1: Identifying other relevant policies, plans and programmes, and sustainability objectives A2: Collecting baseline information A3: Identifying sustainability issues and problems A4: Developing the SA framework A5: Consulting on the scope of the SA
<b>DPD Stage 2: Production</b>
<b>SA Stages and tasks</b>
Stage B: Developing and refining options and assessing effects B1: Testing the DPD objectives against the SA framework B2: Developing the DPD options B3: Predicting the effects of the DPD B4: Evaluating the effects of the DPD B5: Considering ways of mitigating adverse effects and maximising beneficial effects B6: Proposing measures to monitor the significant effects of implementing the DPD
Stage C: Preparing the Sustainability Appraisal Report C1: Preparing the SA Report
Stage D: Consulting on the preferred options of the DPD and SA Report D1: Public participation on the preferred options of the DPD and SA Report D2 (i): Appraising significant changes
<b>DPD Stage 3: Examination</b>
<b>SA Stages and tasks</b>
D2 (ii): Appraising significant changes resulting from representations
<b>DPD Stage 4: Adoption and Monitoring</b>
<b>SA Stages and tasks</b>
D3: Making decisions and providing information
Stage E: Monitoring the significant effects of implementing the DPD
E1: Finalising aims and methods for monitoring
E2: Responding to adverse effects

## Purpose of the SA Report

- 1.29 The SA is needed to inform the decision making process during the preparation of the Core Strategy. This will ensure that potential sustainable development implications of the Core Strategy are identified and recognised in the choices made by the local planning authority (LPA). The SA must also test the performance of the Core Strategy in order to determine whether it appears to be appropriate for the task intended.
- 1.30 The requirement to prepare a Sustainability Appraisal Report arises directly from Article 5.1 of the SEA Directive which states that:

*‘An Environmental Report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into*

*account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated.'*

- 1.31 In sustainability appraisal the Sustainability Appraisal Report replaces the Environmental Report as required under the SEA Directive.
- 1.32 This Sustainability Appraisal Report reports on the work undertaken during the initial stages of the SA process and takes the process further by reporting on the significant social, environmental and economic effects of the preferred policies, proposed mitigation measures and proposals for monitoring significant sustainability effects.

## Programme and Responsibility

- 1.33 The SA process up to completion of the Core Strategy Preferred Options and Strategic Sites Issues and Options Sustainability Appraisal Report was carried out by Council Officers. The preparation of the Sustainability Appraisal Report for the Core Strategy Submission Document was undertaken by Atkins Limited independently of St Edmundsbury Borough Council. The Sustainability Appraisal Report was updated by Atkins Limited to reflect changes in policy following the Inspector's Report received August 2010.
- 1.34 Table 1.3 outlines the timetable and process undertaken to prepare the Sustainability Appraisal.

**Table 1.3 – Key SA Tasks and Outputs**

Task / Output	Date	Comments
Draft SA Scoping Report	October 2006	Report considered available data and experience of Council Officers/LDF and took into account responses to an informal consultation, undertaken between December 2004 and January 2005 with the statutory bodies, relevant Primary Care Trusts, EERA, Suffolk Development Agency, Suffolk Wildlife Trust and other Local Authority services.
Consultation	October 2006	Natural England, English Nature, English Heritage, Suffolk Primary Care Trust, EERA, East of England Development Agency, Suffolk Wildlife Trust, Suffolk County Council and Go – East were consulted on the draft SA Scoping Report.
Updated SA Scoping Report	April 2007	Sustainability Appraisal Scoping Report completed
Draft Core Strategy Issues and Options Initial Sustainability Appraisal	March 2008	The document included the compatibility assessment of the Core Strategy objectives and appraisal of five identified potential options for the location of growth in the borough.
Consultation	March/April 2008	A wide variety of public/stakeholder events. 30 responses made in relation to the Sustainability Appraisal.
Core Strategy Preferred Options and Strategic Sites Issues and Options Sustainability Appraisal	November 2008	The document included the appraisal of Core Strategy policies and Development Control Policies.
Consultation	November 2008 – January 2009	A wide public consultation. Forty comments were received in relation to the

		Sustainability Appraisal.
Submission Core Strategy Document SA Report	July 2009	The Submission Core Strategy SA Report reviewed and updated information previously presented in the SA Scoping Report, Issues and Options Initial SA and Core Strategy Preferred Options and Strategic Sites Issues and Options SA and presents the appraisal of the final set of the Core Strategy policies.
Consultation	August 2009 – October 2009	There was an eight week consultation on the Core Strategy and SA Report
Examination in Public and Inspector's Report	Report received 24 August 2010	The Core Strategy underwent Examination in Public. The Inspector found the Core Strategy to be Sound, subject to some minor alterations.
Final SA Report	September 2010	Following minor amendments to the Core Strategy arising from the Inspector's comments, the SA Report has been updated (this document).

## Consultation

- 1.35 The Draft Scoping Report was issued for consultation in October 2006 in accordance with the following regulations:
- Article 5(4) of EU Directive 2001/42/EC;
  - The Environmental Assessment of Plans and Programmes Regulations 2004; and
  - Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004.
- 1.36 Copies of the draft Scoping Report were sent to the following statutory consultees:
- English Nature (now Natural England);
  - English Heritage;
  - Environment Agency; and
  - Countryside Agency (now Natural England).
- 1.37 Copies of the Draft SA Report were also directly sent to the Suffolk Primary Care Trust, East of England Regional Authority, East of England Development Agency, Suffolk Wildlife Trust, Suffolk County Council and Go – East.
- 1.38 For the Draft Core Strategy Issues and Options Report and Core Strategy Preferred Options and Strategic Sites Issues and Options Report and their accompanying SA Reports a wide variety of public/stakeholder events in accordance with the council's adopted Statement of Community Involvement (2008) was undertaken including the following:
- Library drop in sessions at all public libraries in the borough;
  - Parish Council presentations in Bury St Edmunds and Haverhill;
  - Leaflet drops at supermarkets and distribution to village shops/services;
  - Articles in the councils 'Community Spirit' magazine which is distributed to all households in the borough;
  - Engagement with the Western Suffolk Local Strategic Partnership;

- Focus Groups comprising key stakeholders to discuss and help form specific elements of the strategy;
- Public community presentations in Bury St Edmunds and Haverhill; and
- Website: for the Preferred Options consultation an interactive document was available to view on the council's public consultation pages. An interactive questionnaire was also available so that comments could be submitted electronically.

1.39 The Submission Core Strategy SA Report accompanied the Core Strategy Submission Document consultation that took place between 12th August – 7th October 2009.

## Appropriate Assessment

1.40 Under Regulation 48(1) of the Conservation (Natural Habitats, &C) (Amendment) (England and Wales) Regulations 2006 an Appropriate Assessment needs to be undertaken in respect of any plan or project which:

- a. either alone or in combination with other plans or projects would be likely to have a significant effect on a European Site, and
- b. is not directly connected with the management of the site for nature conservation.

1.41 European sites include Special Areas of Conservation (SAC) and Special Protection Areas (SPA). There are three European designations within the Borough: Breckland SPA, Brecklands SAC and Waveney and Little Ouse Valley Fens SAC.

1.42 The requirement for and process of Appropriate Assessment is separate from that for SA. For the Core Strategy DPD the two processes have been run in parallel and the Appropriate Assessment results have been taken into account in the preparation of the SA.

## 2. Appraisal Methodology

### Overview of Approach

- 2.1 The approach used in the SA of the St Edmundsbury Core Strategy is based on the process set out in the guidance<sup>3</sup> from the Office of the Deputy Prime Minister (ODPM – now the Department for Communities and Local Government (DCLG)) on SA of Regional Spatial Strategies (RSSs) and Local Development Documents (LDDs). The SA has been conducted to also meet the requirements of the Strategic Environmental Assessment (SEA) Regulations<sup>4</sup>.
- 2.2 The methodology adopted involved the completion of SA stages A, B, C and D and associated tasks as outlined in Figure 2.1.
- 2.3 The sections below describe the methodology used for Stages A, B, C and D tasks, the results of which are documented in this report.

### Stage A: Setting the Context and Objectives, Establishing the Baseline and Deciding on Scope

- 2.4 Scoping work was undertaken in 2006 (Draft Scoping Report) and revised in 2007 (Updated Scoping Report) to help ensure that the SA covered the key sustainability issues which are relevant to St Edmundsbury within the context of the Core Strategy.

### Other Relevant Plans and Programmes

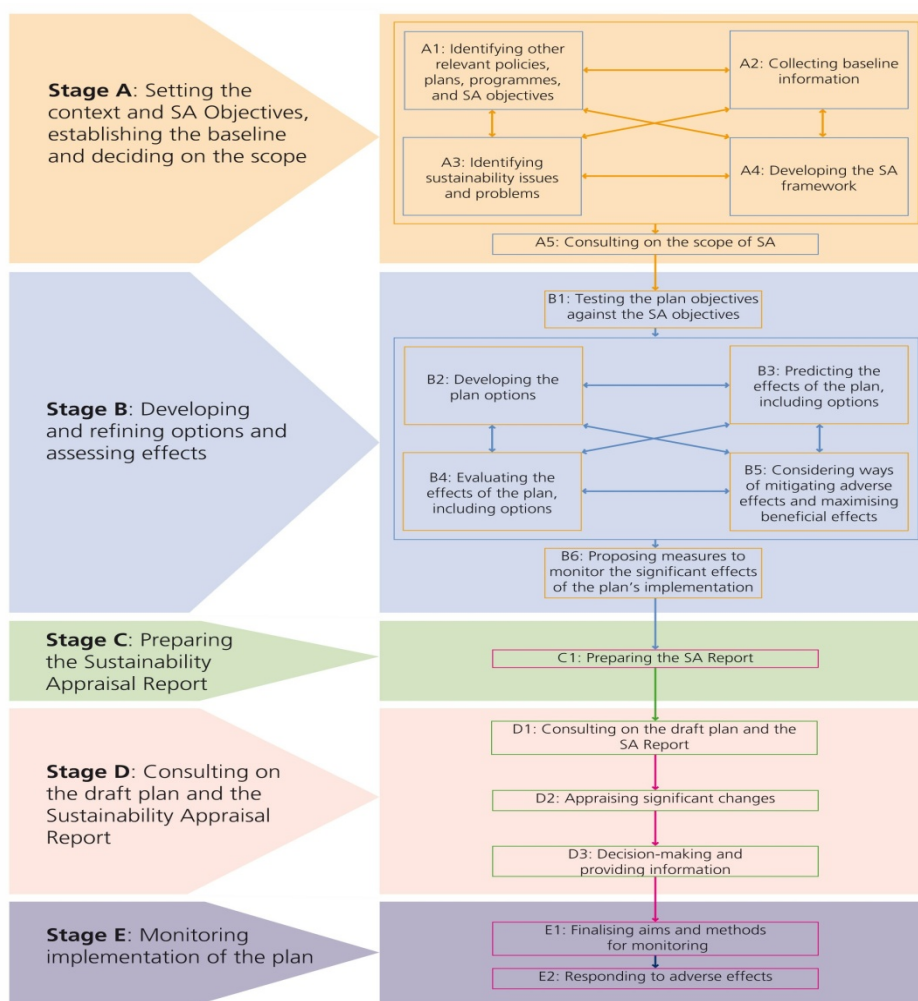
- 2.5 Both the Core Strategy and the SA Scoping Report should be set in the context of national, regional and local objectives along with strategic planning, transport, social, economic and environmental policies. This being the case a comprehensive review of all relevant plans, policies and programmes (PPPs) was carried out as part of the SA scoping process. This ensures that the objectives in the SA Report generally adhere to, and are not in conflict with, objectives found in other PPPs and also assists in the setting of sustainability objectives for the SA. In addition to this it can also be used to ascertain potential conflicts between objectives which may need to be addressed as part of the process.
- 2.6 In order to fully assess relevant PPPs a list was drawn up by the Council using the ODPM SA guidance and local knowledge. For the purposes of comprehensiveness higher tier PPPs were included in the list to show the hierarchy and relationships between the various plans, policies and programmes. The plans, policies and programmes reviewed are outlined in Section 3.

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<sup>3</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, November 2005.

<sup>4</sup> Environmental Assessment of Plans and Programmes Regulations July 2004, which transposed EU Directive 2001/42/EC on assessment of effects of certain plans and programmes on the environment (the 'SEA Directive') into UK law.

**Figure 2.1 – Relationship between SA Stages and Tasks**



Source: Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, November 2005.

## Baseline Data

- 2.7 To predict accurately how the Core Strategy proposals will affect the environment, and social and economic factors, it is first important to understand the current state of these factors and then examine their likely evolution without the implementation of the plan.
- 2.8 Baseline information and data are summarised in section 4. Full baseline datasets are presented in Appendix A where data are listed under social, environmental and economic groupings covering:
- General indicator;
  - Quantified data within the plan area;
  - Comparators and targets (if applicable);
  - Problems/constraints; and
  - Source of the information.
- 2.9 The datasets have been extracted from a wide range of available publications and datasets. Sources have included, among others, national government and government agency websites, census data, and the Office for National Statistics. No primary research has been conducted.



## Sustainability Issues

- 2.10 Analysis of key sustainability issues relevant to the Core Strategy area was carried out. This work was based on the review of relevant plans and programmes and an analysis of the baseline data.
- 2.11 The key sustainability issues for St Edmundsbury were derived by analysing the baseline data and contextual information from other plans and assessing what the likely significant issues will be over the longer term i.e. 10 years +.
- 2.12 In addition to this, the consultation responses to Scoping Report provided further information relating to the identification of sustainability issues for the Borough. These issues were set out in a table under the three sustainable development dimensions (economic, social and environmental) and covered the most relevant topics. The key sustainability issues table is presented in Section 5.

## Sustainability Appraisal Framework

- 2.13 A framework of objectives, indicators and targets, against which the proposals in the Core Strategy can be assessed, was drawn up under the three sustainable development dimensions: social, economic and environmental. These were developed using an iterative process, based on the review of relevant plans and programmes, the evolving baseline and developing analysis of key sustainability issues. The SA framework has been based on the SEA Framework prepared by the Suffolk Sustainability Appraisal Group for all Suffolk authorities to use and adapt in their SA work.
- 2.14 A revised framework was then developed taking on board comments from the consultation on the original Scoping Report. The SA Framework is presented in Section 6.

## Consulting on the Scope of the Sustainability Appraisal





- 2.15 At this stage the Council sought the views of the Consultation bodies and others on the scope and level of detail of the ensuing Sustainability Appraisal Report. A Scoping Report was prepared to that effect. The consultation results were taken into account in the 2007 Update Scoping Report and have influenced and helped shape this SA Report.

## Stage B: Developing and Defining Options

### Compatibility Assessment of Core Strategy Objectives against SA objectives

- 2.16 A compatibility matrix was developed to identify to what extent the objectives of the Core Strategy are compatible with the SA objectives as set out in the SA framework. When testing compatibility the following scale was used:

Table 2.1 – Key to Compatibility of Objectives

	Broadly Compatible
	Potential Conflict
	Dependent on Nature of Implementation Measures
	Not Relevant



## Assessment of Strategic Options

- 2.17 An assessment of the strategic options for the spatial strategy developed for the Core Strategy was then conducted. The assessment used a broad-brush and qualitative approach, which is generally accepted as good practice by the SA guidance for the earlier strategic stages of the appraisal.
- 2.18 Potential sustainability effects for each of the strategic options were assessed in terms of progress towards achieving the relevant SA objective using the scoring system presented in Table 2.2. In addition to a symbol, each element of the assessment scale was also assigned a numeric value, to assist in the analysis of the assessment. To further assist in rapid visual assimilation and comparison of assessment scores numeric values were also colour coded using the following basic scheme:
- Green – positive
  - Red – negative
- 2.19 The numeric scoring system was used to attribute an average score for each strategic option based on its performance against all SA objectives. The assessment of the Core Strategy policies allowed the most and least sustainable aspects of each policy to be identified, with the aim of, where necessary, amending the policies in order to promote their likely sustainable effects and reduce their likely unsustainable effects. This assessment also enabled the identification of those strategic options considered to be the most and least sustainable, and informed the selection of options to be taken forwards as preferred options within the Core Strategy. The results of the assessment are presented in Section 8 and full details can be found in Appendix B. These results were presented in a different format in the initial SA of Core Strategy Issues and Options document (March 2008).






**Table 2.2 – Scoring of Options Assessment**

Scoring of Assessment		
3	+++	Major positive - likely to result in substantial progress towards the objective
2	++	Medium positive - likely to result in some progress towards the objective
1	+	Minor positive - likely to result in very limited progress towards the objective
0	0	Neutral outcome
-0.5	+/-	Range of possible positive and negative outcomes
0	?	Uncertain outcome
-1	-	Minor negative - likely to be to the very limited detriment of achieving the objective
-2	--	Medium negative - likely to be to the limited detriment of achieving the objective
-3	---	Major negative - likely to be substantially detrimental to achieving the objective

## Assessment of Strategic Sites

- 2.20 The proposed strategic sites were also assessed in order to identify those potential development sites with the most sustainable effects. SA criteria for the sites assessment was devised based on the SA Framework, consultation comments and questions listed in the Core Strategy Preferred Options and Strategic Sites Issues and Options Document (November 2008) to ensure that the assessment of the strategic sites is fit for purpose. The assessment of the sites was undertaken using the following qualitative assessment scale:

**Table 2.3 - Key to Strategic Sites Assessment**

	In conformity with the criterion		Not relevant to criterion / Neutral effects
	Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified		Insufficient information is available
	In conflict with the criterion		

- 2.21 Matrices were used to record likely sustainability effects of each strategic site against each objective in the SA framework. Full details of the sites assessments can be found in Appendix C and summary of the assessment is presented in Section 8.

### Detailed Assessment of Core Strategy Policies

- 2.22 A detailed assessment of each of preferred Core Strategy policy was conducted using a separate assessment sheet. The results of the policy assessments were then brought together in a single sheet summarising the assessment across all policies.
- 2.23 The detailed assessment comprised a systematic two-stage process, described below.

#### Prediction of Effects

- 2.24 Using the baseline data and supporting information, the effects of the policies have been predicted for each of the SA objectives. A six point scale was used to characterise the magnitude of predicted effects in terms of the change to the current baseline. Effects were also characterised in terms of their geographical extent, their duration (short, medium or long term), whether they are likely to be temporary or permanent, and the degree of certainty with which the prediction was made. Predictions were made using the evidence of the baseline data wherever possible. Short term, medium and long term effects were defined as those predicted to commence within the first five, five to ten and ten or more years of implementation of the Core Strategy, respectively
- 2.25 Table 2.4 details the scoring scales used to characterise the various features of the predicted effects.

Table 2.4 – Sustainability Effects Scoring

Magnitude	Scale	Duration	Permanence	Certainty
✓✓ Major positive	Local	Within or in proximity to St Edmundsbury	Temp	Low
✓ Minor positive	Sub-Reg	Western Suffolk and surrounding districts	Perm	Med
- No effect	Reg/Nat	East of England and beyond		High
? Unclear effects		ST		
✗ Minor negative		MT		
✗✗ Major negative		LT		

- 2.26 Magnitude of effects was defined in terms of progress towards achieving the relevant SA objective:
- *Major Positive* - likely to result in substantial progress towards the objective
  - *Minor Positive* - likely to result in limited progress towards the objective
  - *Major Negative* - likely to be substantially detrimental to achieving the objective
  - *Minor Negative* - likely to be to the limited detriment of achieving the objective

#### Assessment of the Significance of Effects

- 2.27 The effects predicted for each SA objective for each policy and preferred strategic site were assessed for significance using a simple, systematic process. An assessment score was derived for each objective based on the scores for each effect characteristic (*magnitude, duration, scale, permanence and certainty*) for short, medium and long term effects, using the assessment scale shown in Table 2.5.

Table 2.5 – Sustainability Assessment Scoring

+++	Strongly positive
++	Moderately positive
+	Slightly positive
0	No effect
-	Slightly negative
--	Moderately negative
---	Strongly negative
+/-	Combination of positive and negative effects / neutral effect

2.28 For the purposes of analysing the results of the assessment, significant effects are those that result in strongly or moderately negative or positive effects.

2.29 Assessment of the policies was undertaken in November 2009 for submission (see section 9) and updated following changes to the policies after the Inspector's Report received August 2010 (see Section 10).

### Secondary and Cumulative Effects Assessments

2.30 Annex I of the SEA Directive requires that the assessment of effects include secondary, cumulative and synergistic effects.

2.31 **Secondary or indirect effects** are effects that are not a direct result of the plan, but occur away from the original effect or as a result of the complex pathway e.g. a development that changes a water table and thus affects the ecology of a nearby wetland. These effects are not cumulative and have been identified and assessed primarily through the examination of the relationship between various objectives during the Assessment of Environmental Effects.

2.32 **Cumulative effects** arise where several proposals individually may or may not have a significant effect, but in-combination have a significant effect due to spatial crowding or temporal overlap between plans, proposals and actions and repeated removal or addition of resources due to proposals and actions. Cumulative effects can be:

- **Additive-** the simple sum of all the effects;
- **Neutralising-** where effects counteract each other to reduce the overall effect;
- **Synergistic-** is the effect of two or more effects acting together which is greater than the simple sum of the effects when acting alone. For instance, a wildlife habitat can become progressively fragmented with limited effects on a particular species until the last fragmentation makes the areas too small to support the species at all.

2.33 Many environmental problems result from cumulative effects. These effects are very hard to deal with on a project by project basis through Environmental Impact Assessment. It is at the SA level that they are most effectively identified and addressed.

2.34 Cumulative effects assessment is a systematic procedure for identifying and evaluating the significance of effects from multiple activities. The analysis of the causes, pathways and consequences of these effects is an essential part of the process.

2.35 Cumulative (including additive, neutralising and synergistic) effects have been considered throughout the entire SA process, as described below:

- As part of the review of relevant strategies, plans and programmes and the derivation of draft SA objectives, key receptors have been identified which may be subject to cumulative effects.
- In the process of collecting baseline information cumulative effects have been considered by identifying key receptors (e.g. specific wildlife habitats) and information on how these have changed with time, and how they are likely to change without the implementation of the Local Development Framework. Targets have been identified (where possible), that identify how

close to capacity the key receptor is, which is a key determining factor in assessing the likelihood of cumulative and synergistic effects occurring, and their degree of significance.

- Through the analysis of environmental issues and problems, receptors have been identified that are particularly sensitive, in decline or near to their threshold (where such information is available).
- The development of SA objectives, indicators and targets has been influenced by cumulative effects identified through the process above..
- The likely cumulative effects of the strategic alternatives have been identified which highlighted potential cumulative effects that should be considered later in the SA process.
- Testing the consistency between the Core Strategy and SA objectives has highlighted the potential for cumulative effects against specific Core Strategy objectives.
- Cumulative effects of the policies have been predicted and assessed through the identification of key receptors and SA objectives that consider cumulative effects assessment.

### **Mitigation**

- 2.36 Mitigation measures have been identified during the evaluation process to reduce the scale/importance of significant negative effects and, where possible, enhance positive effects.

### **Monitoring**

- 2.37 SA monitoring involves measuring indicators which will enable the establishment of a causal link between the implementation of the plan and the likely significant effect (positive or negative) being monitored. It thus helps to ensure that any adverse effects which arise during implementation, whether or not they were foreseen, can be identified and that action can be taken to address them.

## **Stage C: Preparing the Sustainability Appraisal Framework**

- 2.38 The SA Report was prepared by the Council to accompany the Preferred Options Core Strategy DPD on consultation.

## **Stage D: Consulting on the Draft Plan and Sustainability Appraisal Report**

### **Appraising significant changes**

- 2.39 The Preferred Options SA Report was revised to take into account significant changes to policies arising from consultation and the Submission SA Report was prepared to accompany the Core Strategy on Submission. Following on from the Inspector's comments on the Submission Core Strategy a number of minor changes were made to policies; these can be seen in table 10.1. The SA Report has now been updated to assess and report on the effects of these changes to the policies.

## **Meeting the requirements of the SEA Directive**

- 2.40 As mentioned in Section 2 there is a fundamental difference between the SA and SEA methodologies. SEA is primarily focused on environmental effects and the methodology addresses a number of topic areas namely Biodiversity, Population, Human Health, Flora and Flora, Soil, Water, Air, Climatic Factors, Material Assets, Cultural Heritage and Landscape and the interrelationship between these topics. SA, however, widens the scope of the appraisal to assess the effects of a plan to include social and economic, as well as environmental topics.

- 2.41 This Sustainability Appraisal has been undertaken so as to meet the requirements of the SEA Directive for environmental assessment of plans. Table 2.6 sets out where the specific SEA requirements have been met in this SA Report.

**Table 2.6 - Schedule of SEA Requirements**

<b>Requirements of the Directive</b>	<b>Where Covered in Report</b>
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is:	
a) An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes	Section 2, Section 3,
b) The relevant aspects of the current state of the environment and the likely evolution without implementation of the plan or programme	Sections 4 and 7, Appendix A
c) The environmental characteristics of areas likely to be significantly affected	Section 4, Appendix A
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directive 79/409/EEC and 92/43/EEC	Section 4 and 5, Appendix A
e) The environmental protection objectives established at international, community or national level which are relevant to the programme and the way those objectives and any environmental considerations have been taken into account during its preparation	Section 3
f) The likely significant effects on the environment, including: short, medium and long term; permanent and temporary; positive and negative; secondary, cumulative and synergistic effects on issues such as: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Sections 7, 8 and 9, 10 Appendix B,C and D
g) The measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse effects on the environment of implementing the plan or programme.	Sections 11 Appendix D.
h) An outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Section 8, Appendices B and C
i) A description of measures envisaged concerning monitoring (in accordance with regulation 17)	Section 12
j) A non-technical summary of the information provided under the above headings	Non-technical summary

## 3. Other Relevant Plans and Programmes

### Introduction

- 3.1 The SEA Directive states that the Environmental Report should provide information on:
- ‘The plan’s relationship with other relevant plans and programmes’ and “the environmental protection objectives, established at international, [European] Community or national level, which are relevant to the plan... and the way those objectives and any environmental considerations have been taken into account during its preparation” (Annex 1 (a), (e)).*
- 3.2 Prior to drafting the SA Objectives, a review of all relevant plans and programmes was undertaken (see SEBC SA Scoping Report). This review identified the relationships between the SA and plans and programmes which, in turn, enabled potential synergies to be exploited and, conversely, conflicting initiatives to be identified.
- 3.3 The purpose of this review was not only to list relevant plans and programmes, but to highlight the influence that the plans and programmes may have upon the SA and Core Strategy in terms of themes set out within them. This review represented the first step in the derivation of the Sustainability Appraisal Framework for the Core Strategy. Table 3.1 lists the documents reviewed in the Core Strategy SA Scoping Report and any plans or programmes that have been published or updated since production of the Core Strategy SA Scoping Report.
- 3.4 This list of the PPPs was updated in June 2009 in the Sustainability Appraisal Report prepared to accompany the Core Strategy Submission Document. It is noted that since this time, the policy context in which the Core Strategy is set has continued to evolve. Recent Planning Policy Statements have been considered in the context of the assessments of the policies in the Core Strategy document prepared after the Inspector’s report (see section 10).

**Table 3.1 – Relevant Policies, Plans and Programmes (June 2009)**

International/European context	
The Johannesburg Declaration on Sustainable Development – Commitments arising from summit. Sept 2002	
The UN Millennium Declaration and Millennium Development Goals – Sept 2000 (RSS)	
Kyoto Protocol and the UN Framework Convention on Climate Change – May 1992 (RSS)	
Bern Convention on the Conservation of European Wildlife and Natural Habitats – 1979 (RSS)	
Ramsar Convention on Wetlands of international importance especially as waterfowl habitat – 1971 (RSS)	
Bonn Convention on the Conservation of Migratory Species of Wild Animals (1979) (RSS)	
A New Partnership for Cohesion – Third Report on Economic and Social Cohesion (Feb 04) and Draft New Regulations for Renewed Structural Funds (July 2004)	
Aarhus Convention (1998)	
EU Sixth Environmental Action Plan (2002)	
European Spatial Development Perspective (May 1999)	
Renewed EU Sustainable Development Strategy (2006)	
European Biodiversity Strategy (1998)	
EU Thematic Strategy on Air Quality (2005)	
Espoo Convention on Environmental Impact Assessment in a Transboundary Context (1991)	
EU Biodiversity Strategy (1998)	
OSPAR Biological Diversity and Ecosystems Strategy (2003)	
UN Convention on Biological Diversity (1992)	
Strategy on Climate Change: Control Measures Through Until 2020 and Beyond (2007)	



The Climate action and renewable energy package 2008
European Landscape Convention (2000)
EU Thematic Strategy for Soil Protection (2004)
The European Convention on the Protection of Archaeological Heritage (Revised)
UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage (1972)
<b>European Directives</b>
Air Quality Framework Directive – 96/62/EC (RSS)
Directive to Promote Electricity from Renewable Energy – 2001/77/EC (RSS)
Directive for the Encouragement of Bio-Fuels for Transport – 2003/30/EC (RSS)
Water Framework Directive – 2000/60/EC (RSS)
Urban Waste Water Treatment Directive – 91/271/EEC (RSS)
Water Pollution caused by Nitrates from Agricultural Sources: Nitrates Directive – 91/676/EEC (RSS)
Bathing Water Quality Directive – 76/160/EEC (RSS)
Drinking Water Directive – 98/83/EC (RSS)
Environmental Impact Assessment (EIA) 85/337/EEC (RSS)
Strategic Environmental Assessment (SEA) – 2001/42/EC (RSS)
Directive 79/409/EEC on the Conservation of Wild Birds (RSS)
Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (RSS)
Framework Waste Directive – 75/442/EEC, as amended (RSS)
Directive 99/31/EC on the landfill of waste (RSS)
Packaging and Packaging Waste Directive – 94/62/EC of 20 Dec 1994 (RSS)
Hazardous Waste Directive 91/689/EEC
Energy Performance in Building Directive 2002/91/EEC
EU Soil Framework Directive (Proposed)
IPPC Directive 96/61/EC – Integrated Pollution Prevention and Control
Groundwater Directive (GDW) 2006/118/EC
Surface Water Abstraction Directive 75/440/EEC
<b>National, regional and local context</b>
<b>National Planning Policy Guidance, Planning Policy Statements and Minerals Policy Statements</b>
PPS1 – Creating Sustainable Communities (Feb 04)
PPS 1 Supplement Climate Change (Dec 2007)
PPG2 – Green Belts (Jan 95)
PPS3 – Housing (Nov 06)
PPG4 – Industrial and Commercial Development and Small Firms (Nov 92)
PPG5 – Simplified Planning Zones (Nov 92)
PPS6 – Planning for Town Centres (March 2005)
PPS7 – Sustainable Development in Rural Areas (Aug 2004)
PPG8 – Telecommunications (August 2001)
PPS9 – Biodiversity and Geological Conservation (August 2005)
PPS10 – Planning for Sustainable Waste Management (July 2005)
PPS11 – Regional Spatial Strategies (2004)
PPS12 – Local Development Frameworks (Aug 04)
PPG13 – Transport (March 94)
PPG14 – Development on Unstable Land (April 90)
PPG15 – Planning and the Historic Environment (Sept 94)

PPG16 – Archaeology and Planning (Nov 90)
PPG17 – Planning for Open Space, Sport and Recreation (July 02) (RSS)
PPG20 – Coastal Planning (Sept 92)
Review of PPS21: Tourism (March 2003)
PPG21 – Tourism (Nov 92)
PPS22 – Renewable Energy (Aug 04)
PPS23 – Planning and Pollution Control (2004)
PPG24 – Planning and Noise (Sept 94)
PPS25 - Development and Flood Risk (Dec 06)
MPS 1: Planning and Minerals
Climate Change Act 2008
<b>Strategies and Plans</b>
<b>Urban</b>
Our Towns and Cities: The Future – Delivering an Urban Renaissance (Nov 2000)
Towns and Cities Strategy and Action Plan, Urban Renaissance in the East of England (RSS)
<b>Rural</b>
Government Rural White Paper: Our Countryside – the future – a fair deal for rural England, DETR (2000) (RSS)
The Countryside and Rights of Way Act 2000
Rural Strategy, DEFRA (2004)
<b>Sustainable Communities</b>
The UK Government Sustainable Development Strategy: Securing the Future (March 2005)
Sustainable Communities Plan: Building for the Future (2003) (RSS)
A Sustainable Development Framework for the East of England, October 2001 (RSS)
Sustainable Communities in the East of England 2003
Strategy for Sustainable Construction (June 2008)
The Code for Sustainable Homes: Setting the standard in sustainability for new homes (2008)
Creating Sustainable Communities – In the East of England (Jan 2005)
A Better Quality of Life: a Strategy for Sustainable Development in the UK (1999), Taking it on: Developing UK Sustainable Development Strategy Together (Consultation: 2004)
<b>Regional Spatial Strategy</b>
Regional Spatial Strategy – RSS (banked version April 2004)
RSS14 for the East of England SEA Scoping Report (17 September 2004)
East of England Plan: RSS for the East of England (EERA, 2008)
<b>Other Regional Strategies</b>
An Integrated Regional Strategy for the East of England (Feb 2005)
East of England European Strategy 2003 – 2004, June 2003 (RSS)
Towards Sustainable Construction – A Strategy for the East of England, Draft 2003 (RSS)
<b>Regeneration</b>
Haverhill Masterplan (30 August 2005)
<b>Transport</b>
Aviation White Paper (Dec 2003)
Government/DfT 10 Year Transport Plan 2000 (RSS)
DfT – Meeting the Energy Challenge – Energy White Paper (May 2007)
DfT – Building Sustainable Transport into New Developments: A Menu of Options for Growth Points and Eco-towns (specially designed for Designated Growth Points) (April 2008)
Manual for Streets (2007)
The Future of Transport: a Network for 2030 – White Paper (2004)
The Future of Rail – White Paper (July 2004)
Suffolk Local Transport Plan 2006 - 2011



Suffolk Bus Strategy, 2003
East of England Regional Transport Strategy (April 2003) (Incorporated as a chapter in RPG14)
St Edmundsbury Borough Council SPG7 – St Edmundsbury Borough Council Cycling Strategy (September 1995)
Suffolk County Council and St Edmundsbury Borough Council - Haverhill Local Transport Action Plan (May 2003)
A Pedestrian Strategy for Bury St Edmunds (January 2001)
Bury St Edmunds Transport Strategy (2006)
<b>Community Strategies and Community Development Strategies</b>
Altogether a better Suffolk – Suffolk's Community Strategy 2004 (Consultation Draft)
West Suffolk Local Strategic Partnership –Community Strategy 2006 - 2016 (June 2004)
St Edmundsbury Borough Council Community Development Plan (Jan 2004)
<b>Suffolk Structure Plan</b>
Suffolk Structure Plan – 2001
All Structure Plan Policies will be replaced by RSS14, except 'saved' policies. Saved policies will be valid until at least 28 September 2007.
<b>Neighbouring Authority and National Park Local Plans/Local Development Documents</b>
Mid Suffolk Local Plan (September 1998)
Babergh Local Plan ( 2006)
Forest Heath Local Plan (December 1995)
Breckland Local Plan (September 1999)
Braintree District Local Plan Review (July 2005)
South Cambridgeshire Local Plan (February 2004)
East Cambridgeshire District Local Plan (June 2000)
<b>Parish Plans</b>
Bardwell Parish Plan Group – Action Plan 2002 – 2010
Barningham Parish Plan 2003 – 2010
Barrow cum Denham Community Action Plan 2002 – 2005
Cavendish Village Report and Action Plan December 2003
Chedburgh Action Plan 2002 - 2005
Horringer cum Ickworth Parish Plan 2005 - 2015
Ixworth and Ixworth Thorpe Parish Plan 2005
Market Weston Parish Plan 2005 – 2010
Whepstead Parish Plan 2005 - 2015
<b>Local Authority Corporate Plans and Strategies</b>
Suffolk County Council Policy and Performance Plan 2004
Local Area Agreement: Suffolk 2 2008-2011 (2008)
St Edmundsbury Borough Council Capital Strategy (September 2005)
Corporate Plan (Jun 2009)
St Edmundsbury Borough Council Equality Scheme (2008)
St Edmundsbury Borough Council Asset Management Plan and Capital Strategy – Performance Management and Implementations Plan July 05 – 06
<b>Social – National, regional and local context</b>
<b>Social Inclusion</b>
Regional Social Strategy for the East of England (May 2004)
Suffolk County Council Equalities Policy (April 2003)
St Edmundsbury Borough Council Health and Wellbeing Strategy 2004 - 2008
St Edmundsbury Borough Council People Strategy (July 2004)
<b>Health</b>

Choosing Health: Making healthy choices easier (Nov 2004)
Healthy Futures: A Regional Health Strategy for the East of England 2005-2010 (EERA) Draft 22 <sup>nd</sup> July 05
Social Care Annual Plan 2003-4
Norfolk, Suffolk and Cambridgeshire NHS Strategic Health Authority – Health Strategy 2005-2010
Bury and The Rural North – Locality Profile - Suffolk West NHS PCT (Dec 2004)
Haverhill - Locality Profile - Suffolk West NHS PCT (Dec 2004)
<b>Culture</b>
Culture: a catalyst for change. A Strategy for Cultural Development for the East of England, Living East (June 2004)
Cultural Strategy for Suffolk (March 2002)
St Edmundsbury Borough Council Vision 2025: Leisure and Culture Action Plan (Dec 2005)
<b>Education</b>
Suffolk's Strategy for Learning 2004-9 (updated version): The Single Plan (May 2005)
Suffolk County Council – School Organisation Plan 2004-9 (Jan 2005)
Schools in Suffolk: Developing New Roles and Relationships in Support of Children and Young People (January 2005)
Suffolk County Council – Key Stage 2 in the Three Tier System – a 3 Year Project (2005)
Suffolk County Council – Building Schools for the Future (2004)
Suffolk 14-19 Strategy (2004)
<b>Housing</b>
Revised Regional Housing Strategy for the East of England: Strategy Document 2005-2010 (Draft) (February 2005)
Homes for the Future: More Affordable, More Sustainable (July 2007)
Affordable Housing Study: The Provision of Affordable Housing in the East of England 1996-2021, 2003 (RSS)
East of England Affordable Housing Study Stage 2: Provision for Key Workers and Unmet Housing Need, 2005
St Edmundsbury Borough Council Housing Strategy 2004 – 2008
Cambridgeshire Sub-Regional Housing Strategy 2004 – 2008/9
St Edmundsbury Borough Council Empty Homes and Wasted Space Strategy 2005 – 2009
St Edmundsbury Borough Council Urban Capacity Study (January 2003) – reviewed September 2005
St Edmundsbury Housing Requirements Study (October 2005)
St Edmundsbury Strategic Housing Land Availability Assessment (July 2009)
Affordable Housing Economic Viability Study (July 2009)
<b>Community safety</b>
Suffolk Community Strategy (Transforming Suffolk 2008-2028)
Creating a Safer Stronger Suffolk - Western Suffolk Crime and Disorder Reduction Partnership Strategy 2005 – 2008
<b>Environmental – National, regional and local context</b>
<b>Environmental Strategies</b>
Environment, Our future: Regional Environment Strategy for the East of England, East of England Regional Assembly and East of England Environment Forum, July 2003 (RSS)
St Edmundsbury Borough Council Vision 2025: Sustainable Environment Action Plan (Dec 2005)
<b>Soil</b>
Farming and Food Strategy, Facing the Future, DEFRA, (Dec 2002)

The First Soil Action Plan for England: 2004 – 2006 (2004)
Contaminated Land Strategy for the Borough of St Edmundsbury (Nov 2005)
<b>Climate</b>
Climate Change – UK Programme, DETR, November 2000 (RSS)
UK Climate Change Bill (2008)
Building a Greener Future Towards Zero Carbon Development – Consultation (Dec 2006)
Living with Climate Change in the East of England – Summary report supported by technical report (2003) (RSS)
St Edmundsbury Borough Council Climate Change Action Plan – in draft form to be reviewed once adopted
<b>Air quality</b>
Air Quality Strategy for England, Scotland, Wales and Northern Ireland (DEFRA, 2007)
Updating and Screening Assessment of Air Quality in St Edmundsbury (2006)
Environment Act 1995 Local Air Quality Management Progress Report, St Edmundsbury (2007)
<b>Heritage</b>
English Heritage Strategy 2005 – 2010
Historic Environment: A Force For the Future (2001)
Heritage Counts: State of the Historic Environment (2004)
<b>Water</b>
Water Resources for the Future – A Strategy for England and Wales (EA, 2001)
Water Resources for the Future: A Strategy for Anglian Region (RSS)
Water for People and the Environment – Consultation Document (EA, 2007)
<b>Biodiversity and nature conservation</b>
Working with the Grain of Nature: A Biodiversity Strategy for England (2002) (RSS)
Wildlife and Countryside Act (1981, as amended) (RSS)
Butterfly Conservation – Regional Action Plan for Anglia (2000)
Suffolk Biodiversity Action Plan, Updated December 2004
State of Nature – Lowlands – Future Landscapes for Wildlife (2004) (RSS)
The Countryside and Rights of Way Act (2000)
The Conservation (Natural Habitats, &c.) Regulations (1994)
Regional Biodiversity Action Plan
<b>Countryside management</b>
Suffolk Rights of Way Improvement Plan – in preparation
Suffolk Countryside Strategy
<b>Woodland</b>
Keepers of Time – A Statement of Policy for England's Ancient and Native Woodlands: Action Plan 2005 –
Woodlands for Life: The Regional Woodland Strategy for the East of England, November 2003 (RSS)
<b>Minerals and waste</b>
Suffolk Minerals Local Plan Adopted May 1999
Regional Waste Management Strategy (2002) (RSS)
Suffolk Waste Local Plan – Revised Deposit Draft (January 2004).
English Nature Policy Position Statement: Waste Management (2002)
Joint Municipal Waste Management Strategy for Suffolk 2020 (Oct 2003)
<b>Economic – National, regional and local context</b>
<b>Economic and Employment Strategies</b>
A Shared Vision – The Regional Economic Strategy for the East of England (Nov 2004)
Prioritisation in the East of England. June 2003 (RSS)

Regional Emphasis Document SR2004, December 2003 (RSS)
Framework for Regional Employment and Skills Action (FRESA) (2003) (RSS)
International Business Strategy, Consultation Draft, December 2003 (RSS)
Expanding Suffolk's Horizons: 2004-7 – A New Economic Strategy for Suffolk
Objective 2 Local Area Framework (2004-2005)
Economic Development Strategy – St Edmundsbury (Dec 2005)
St Edmundsbury Rural Action Plan (2008)
<b>Tourism</b>
Regional Tourism Strategy 2000 – 2010
Tomorrows Tourism Today (August 04)
Sustainable Tourism Strategy for the East of England (March 2004)

## Key Sustainability Themes

- 3.5 The relevant plans and programmes identified in table 3.1 were analysed to derive a set of key sustainability themes relevant to the national, regional and local context. These key sustainability themes provide important clues in terms of the SA objectives which are likely to require consideration in the Sustainability Appraisal Framework for the Core Strategy. Table 3.2 presents the results of the analysis of key sustainability themes, which includes cross references to the documents in which they feature, and highlights their relevance to the SEA topics stated in the SEA Directive and the SA objectives in Table 6.1.

Table 3.2 – Sustainability Themes

No	Sustainability Theme		SEA Topic	Relationship to SA Objectives
1.	Improve the health and well-being of the population	The UN Millennium Declaration and Millennium Development Goals; PPS1; PPG2; PPG17; PPG24, The Countryside and Rights of Way; A Sustainable Development Framework for the East of England; East of England Plan: RSS for the East of England; The Future of Transport: a Network for 2030; Suffolk's Community Strategy 2004; Choosing Health: Making Healthy Choices Easier; Healthy Futures: A Regional Health Strategy for the East of England 2005-2010; Social Care Annual Plan 2003-4; Norfolk, Suffolk and Cambridgeshire NHS Strategic Health Authority – Health Strategy 2005-2010; Bury and The Rural North – Locality Profile - Suffolk West NHS PCT; Haverhill - Locality Profile - Suffolk West NHS PCT; St Edmundsbury Borough Council Health and Wellbeing Strategy 2004 – 2008; Farming and Food Strategy, Facing the Future; National Air Quality Strategy for England, Wales, Scotland and Northern Ireland; Suffolk Waste Local Plan.	Population, Human Health	1
2.	Reduce social exclusion and improve equality of opportunity	The Johannesburg Declaration on Sustainable Development; The UN Millennium Declaration and Millennium Development Goals; A New Partnership for Cohesion – Third Report on Economic and Social Cohesion; European Spatial Development Perspective; Renewed EU Sustainable Development Strategy; PPS1; PPS7; Rural Strategy; The UK Government Sustainable Development Strategy: Securing the Future; Sustainable Communities Plan: Building for the Future; A Sustainable Development Framework for the East of England; Creating Sustainable Communities – In the East of England; A Better Quality of Life: a Strategy for Sustainable Development in the UK; RSS for the East of England; East of England European Strategy; Corporate Plan - St Edmundsbury: Improving the quality of life for everyone in the borough; St Edmundsbury Borough Council Equality Framework; St Edmundsbury Borough Council Disability Equality Scheme 06 – 09; Regional Social Strategy for the East of England; Suffolk County Council Equalities Policy; St Edmundsbury Borough Council Health and Wellbeing Strategy 2004 – 2008; St Edmundsbury Borough Council People Strategy; St Edmundsbury Borough Council Race Equality Scheme 2005 – 2008.	Human health, Population	4, 5, 6
3.	Improve opportunities for access to education,	The Johannesburg Declaration on Sustainable Development; The UN Millennium Declaration and Millennium Development Goals; European	Human health, Landscape,	1, 2, 5, 6, 8

No	Sustainability Theme		SEA Topic	Relationship to SA Objectives
	employment, recreation, health, community services and cultural opportunities	Spatial Development Perspective; Renewed EU Sustainable Development Strategy; PPS1; PPG4; PPS6; PPS7; PPS11; PPS12; PPG20; Our Towns and Cities: The Future – Delivering an Urban Renaissance; Towns and Cities Strategy and Action Plan, Urban Renaissance in the East of England; The Countryside and Rights of Way Act; Rural Strategy; Government Rural White Paper: Our Countryside – the future; The UK Government Sustainable Development Strategy; Sustainable Communities Plan: Building for the Future; A Better Quality of Life: a Strategy for Sustainable Development in the UK; Creating Sustainable Communities – In the East of England; A Sustainable Development Framework for the East of England; East of England Plan: RSS for the East of England; East of England European Strategy 2003 – 2004; Government/DFT 10 Year Transport Plan; Building Sustainable Transport into New Developments; The Future of Transport: a Network for 2030 – White Paper; The Future of Rail – White Paper; Suffolk Local Transport Plan; Suffolk Rights of Way Improvement Plan; Suffolk Countryside Strategy.	Population	
4.	Raise educational and achievement levels and develop opportunities for everyone to acquire the skills needed to find and remain in work	The Johannesburg Declaration on Sustainable Development; The UN Millennium Declaration and Millennium Development Goals; A New Partnership for Cohesion – Third Report on Economic and Social Cohesion; Renewed EU Sustainable Development Strategy; SEA 2001/42/EC; PPS1; PPS11; PPS12; The Countryside and Rights of Way Act; The UK Government Sustainable Development Strategy; Sustainable Communities Plan: Building for the Future; A Sustainable Development Framework for the East of England; Sustainable Communities in the East of England; Creating Sustainable Communities; A Better Quality of Life: a Strategy for Sustainable Development in the UK; Altogether a better Suffolk – Suffolk's Community Strategy; Corporate Plan - St Edmundsbury: Improving the quality of life for everyone in the borough; Suffolk County Council – Key Stage 2 in the Three Tier System; Suffolk County Council – School Organisation Plan 2004-9; Suffolk's Strategy for Learning 2004-9; Suffolk County Council – Building Schools for the Future; Suffolk 14-19 Strategy; Schools in Suffolk; Framework for Regional Employment and Skills Action.	Human health, Population	2, 6
5.	Promote levels of employment	The Johannesburg Declaration on Sustainable Development; The UN Millennium Declaration and Millennium Development Goals; A New Partnership for Cohesion – Third Report on Economic and Social Cohesion; Renewed EU Sustainable Development Strategy; PPS1; PPG4; PPS7; PPG5;	Population	6

No	Sustainability Theme		SEA Topic	Relationship to SA Objectives
		PPG21; Rural Strategy; The UK Government Sustainable; Development Strategy: Securing the Future; A Sustainable Development Framework for the East of England; A Better Quality of Life: a Strategy for Sustainable Development in the UK; Regional Tourism Strategy 2000 – 2010; Tomorrows Tourism Today; Sustainable Tourism Strategy for the East of England; Economic Development Strategy – St Edmundsbury; Expanding Suffolk's Horizons: 2004-7; Framework for Regional Employment and Skills Action.		
6.	Reduce the fear of crime	European Spatial Development Perspective; PPS1; PPG5; PPS6; PPS7; PPG20; Our Towns and Cities: The Future – Delivering an Urban Renaissance; Towns and Cities Strategy and Action Plan; A Sustainable Development Framework for the East of England; A Better Quality of Life: a Strategy for Sustainable Development in the UK; Creating Sustainable Communities – In the East of England; Haverhill Masterplan; Altogether a better Suffolk – Suffolk's Community Strategy; St Edmundsbury Borough Council Community Development Plan Local Area Agreement: Suffolk 2005-2008; Suffolk Community Safety Strategy; Creating a Safer Stronger Suffolk – Western; Suffolk Crime and Disorder Reduction Partnership Strategy 2005 – 2008.	Human Health, Population	3
7.	Reduce air pollution	The Johannesburg Declaration on Sustainable Development; The UN Millennium Declaration and Millennium Development Goals; EU Thematic Strategy on Air Quality; Air Quality Framework Directive; Directive for the Encouragement of Bio-Fuels for Transport; PPG2; PPG13; PPS23; PPS6; PPS7; Government Rural White Paper: Our Countryside – the future – a fair deal for rural England; Our Towns and Cities: The Future – Delivering an Urban Renaissance; Towns and Cities Strategy and Action Plan; The Countryside and Rights of Way Act; A Sustainable Development Framework for the East of England; The UK Government Sustainable Development Strategy: Securing the Future; Government/DFT 10 Year Transport Plan; Building Sustainable Transport into New Developments; The Future of Transport: a Network for 2030; Suffolk Local Transport Plan 2001-6; Suffolk Bus Strategy; East of England Regional Transport Strategy; Haverhill Local Transport Action Plan; A Pedestrian Strategy for Bury St Edmunds; Choosing Health: Making healthy choices easier; National Air Quality Strategy for England, Wales, Scotland and Northern Ireland; Air Quality Strategy for England, Scotland, Wales and Northern Ireland; Suffolk	Air, Human Health, Population	9



No	Sustainability Theme		SEA Topic	Relationship to SA Objectives
		Rights of Way Improvement Plan; Updating and Screening Assessment of Air Quality in St Edmundsbury.		
8.	Reduce road traffic and congestion	European Spatial Development Perspective; PPS1; PPS6; PPS11; Our Towns and Cities: The Future – Delivering an Urban Renaissance; Towns and Cities Strategy and Action Plan; Urban Renaissance in the East of England; A Sustainable Development Framework for the East of England; East of England Plan: RSS for the East of England; Government/DFT 10 Year Transport Plan; Building Sustainable Transport into New Developments; Manual for Streets; The Future of Transport: a Network for 2030 – White Paper; Suffolk Local Transport Plan; Suffolk Bus Strategy; Haverhill Local Transport Action Plan; East of England Regional Transport Strategy; St Edmundsbury Borough Council SPG7; Choosing Health: Making healthy choices easier; Climate Change – UK Programme; Bury St Edmunds Transport Strategy (2006).	Air, Human Health, Landscape Population	13
9.	Reduce waste generation and disposal and achieve sustainable management of waste	Urban Waste Water Treatment Directive; Framework Waste Directive; Directive 99/31/EC on the landfill of waste; Packaging and Packaging Waste Directive; Hazardous Waste Directive; PPG4; PPS10; PPS23; A Sustainable Development Framework for the East of England; Towards Sustainable Construction – A Strategy for the East of England; Regional Waste Management Strategy; Suffolk Waste Local Plan; Joint Municipal Waste Management Strategy for Suffolk 2020; English Nature Policy Position Statement: Waste Management.	Soil, Water	12
10.	Maintain and improve the quality of surface and groundwater	Urban Waste Water Treatment Directive; Water Pollution caused by Nitrates from Agricultural Sources: Nitrates Directive; Water Framework Directive; Bathing Water Quality Directive; Drinking Water Directive; IPPC Directive 96/61/EC – Integrated Pollution Prevention and Control; Groundwater Directive (GDW); Surface Water Abstraction Directive; PPG20 PPG21; PPS23; PPS25; Water Resources for the Future – A Strategy for England and Wales; Water for People and the Environment – Consultation Document; Water Resources for the Future: A Strategy for Anglian Region.	Biodiversity, Flora and Fauna, Soil, Water	9
11.	Reduce the use of non-renewable resources	The Johannesburg Declaration on Sustainable Development	Climatic Factors, Material Assets,	11



No	Sustainability Theme		SEA Topic	Relationship to SA Objectives
	and protect local mineral assets	MPS 1: Planning and Minerals; The UK Government Sustainable Development Strategy: Securing the Future; The Code for Sustainable Homes; East of England Plan: RSS for the East of England; Suffolk Minerals Local Plan.	Soil, Water	
12.	Manage and mitigate the risk of flooding	UN Framework Convention on Climate Change; Strategy on Climate Change: Control Measures Through Until 2020 and Beyond; PPS 1 Supplement Climate Change; PPS6; PPG20; PPS25; A Sustainable Development Framework for the East of England; Sustainable Communities Plan: Building for the Future ; The UK Government Sustainable Development Strategy: Securing the Future; Creating Sustainable Communities – In the East of England; A Better Quality of Life: a Strategy for Sustainable Development in the UK; Government/DFT 10 Year Transport Plan ; The Future of Transport: a Network for 2030.	Climatic Factors, Population, Water	15
13.	Address the causes of climate change through reducing emissions of greenhouse gases (GHGs)	The Johannesburg Declaration on Sustainable Development ; UN Framework Convention on Climate Change; EU Sixth Environmental Action Plan; Strategy on Climate Change: Control Measures Through Until 2020 and Beyond; PPS 1 Supplement Climate Change; PPS6; PPG13; A Sustainable Development Framework for the East of England; The UK Government Sustainable Development Strategy: Securing the Future; The Code for Sustainable Homes; Creating Sustainable Communities – In the East of England; Building Sustainable Transport into New Developments: A Menu of Options for Growth Points and Eco-towns; The Future of Transport: a Network for 2030 – White Paper; Suffolk Local Transport Plan; Government/DFT 10 Year Transport Plan; Climate Change – UK Programme; UK Climate Change Bill; St Edmundsbury Borough Council Climate Change Action Plan; Living with Climate Change in the East of England; Building a Greener Future Towards Zero Carbon Development – Consultation.	Climatic factors	14
14.	Increase energy efficiency and increase renewable energy production	PPS22; A Sustainable Development Framework for the East of England; Strategy for Sustainable Construction; The UK Government Sustainable Development Strategy: Securing the Future; Homes for the Future: More Affordable, More Sustainable; Energy Performance in Building Directive; The Code for Sustainable Homes.	Climatic factors	14
15.	Protect and enhance	The European Convention on the Protection of Archaeological Heritage;	Cultural Heritage,	17

No	Sustainability Theme		SEA Topic	Relationship to SA Objectives
	heritage assets and their setting	UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage; PPS6; PPG15; PPG16; Heritage Counts: State of the Historic Environment; Historic Environment: A Force For the Future; English Heritage Strategy 2005 – 2010; East of England Plan: RSS for the East of England; St Edmundsbury Borough Council Vision 2025: Sustainable Environment Action Plan.	Landscape, Population	
16.	Protect, manage and restore soil resources	EU Thematic Strategy for Soil Protection; IPPC Directive 96/61/EC – Integrated Pollution Prevention and Control; EU Soil Framework Directive; PPG14; PPS23; The UK Government Sustainable Development Strategy: Securing the Future; Strategy for Sustainable Construction; Farming and Food Strategy, Facing the Future; The First Soil Action Plan for England: 2004 – 2006; Contaminated Land Strategy for the Borough of St Edmundsbury; St Edmundsbury Borough Council Vision 2025: Sustainable Environment Action Plan.	Biodiversity, Flora and Fauna Landscape, Material Assets, Soil	10
17.	Promote sustainable use and management of the countryside	European Landscape Convention; PPS7; PPS1; Government Rural White Paper: Our Countryside – the future; The Countryside and Rights of Way Act; Rural Strategy; Wildlife and Countryside Act; Suffolk Rights of Way Improvement Plan Suffolk Countryside Strategy; State of Nature – Lowlands – Future Landscapes for Wildlife; The European Convention on the Protection of Archaeological Heritage; UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage; PPS6; PPG15; PPG16; Heritage Counts: State of the Historic Environment; Historic Environment: A Force For the Future; English Heritage Strategy 2005 – 2010; East of England Plan: RSS for the East of England.	Cultural Heritage, Landscape, Material Assets	13, 16, 18
18.	Protect amenity and landscape/townscape settings	European Landscape Convention; PPS7; PPS1; Government Rural White Paper: Our Countryside – the future; The Countryside and Rights of Way Act; Rural Strategy; Wildlife and Countryside Act; State of Nature – Lowlands – Future Landscapes for Wildlife; The European Convention on the Protection of Archaeological Heritage; UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage; PPS6; PPG15; PPG16; Heritage Counts: State of the Historic Environment; Historic Environment: A Force For the Future; English Heritage Strategy 2005 – 2010; East of England Plan: RSS for the East of England; Suffolk Rights of Way Improvement Plan Suffolk Countryside Strategy; St Edmundsbury Borough Council Vision 2025: Sustainable	Cultural Heritage, Landscape	18

No	Sustainability Theme		SEA Topic	Relationship to SA Objectives
		Environment Action Plan.		
19.	Protect, enhance and improve biodiversity and important wildlife habitats	The Johannesburg Declaration on Sustainable Development; The UN Millennium Declaration; Ramsar Convention; Bern Convention; Bonn Convention; EU Sixth Environmental Action Plan; European Biodiversity Strategy; Espoo Convention; EU Biodiversity Strategy; OSPAR Biological Diversity and Ecosystems Strategy; UN Convention on Biological Diversity; Environmental Impact Assessment; PPG2; PPS6; PPS9; The Countryside and Rights of Way Act; The UK Government Sustainable Development Strategy: Securing the Future; Regional Environment Strategy for the East of England; St Edmundsbury Borough Council Vision 2025: Sustainable Environment Action Plan; Working with the Grain of Nature: A Biodiversity Strategy for England; Butterfly Conservation – Regional Action Plan for Anglia; Suffolk Biodiversity Action Plan; State of Nature – Lowlands – Future Landscapes for Wildlife; Wildlife and Countryside Act; The Conservation (Natural Habitats, &c.) Regulations; Regional Biodiversity Action Plan; Woodlands for Life: The Regional Woodland Strategy for the East of England; Keepers of Time – A Statement of Policy for England's Ancient and Native Woodlands: Action Plan 2005; The Birds Directive; The Habitats Directive.	Biodiversity, Fauna and Flora, Climatic Factors, Soil, Water	16
20.	To promote economic development	The Johannesburg Declaration on Sustainable Development ; The UN Millennium Declaration and Millennium Development Goals; A New Partnership for Cohesion – Third Report on Economic and Social Cohesion; Draft New Regulations for Renewed Structural Funds; Renewed EU Sustainable Development Strategy; PPS1; PPG4; PPS7; PPG21; Rural Strategy; Government Rural White Paper: Our Countryside; The UK Government Sustainable Development Strategy: Securing the Future; A Shared Vision – The Regional Economic Strategy for the East of England; Prioritisation in the East of England; International Business Strategy; Expanding Suffolk's Horizons: 2004-7 – A New Economic Strategy for Suffolk; Sustainable Tourism Strategy for the East of England; St Edmundsbury Borough Council Rural Services Review Final Report and Rural Action Plan; Economic Development Strategy – St Edmundsbury; Regional Tourism Strategy; Tomorrows Tourism Today; Objective 2 Local Area Framework (2004-2005).	Material assets, Population	19, 21, 22
21.	Improve the vitality of towns and local centres	PPS1; PPS6; Our Towns and Cities: The Future – Delivering an Urban Renaissance; Towns and Cities Strategy and Action Plan; Urban Renaissance in	Human Health, Landscape,	19, 20

No	Sustainability Theme		SEA Topic	Relationship to SA Objectives
	and encourage urban renaissance	the East of England; The UK Government Sustainable Development Strategy: Securing the Future; Framework for Regional Employment and Skills Action; An Integrated Regional Strategy for the East of England; Economic Development Strategy – St Edmundsbury.	Population	

## 4. Baseline

### Introduction

- 4.1 The SEA Directive says that the Environmental Report should provide information on:
- ‘relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan’ and the “environmental characteristics of the areas likely to be significantly affected’ (Annex I (b) (c)); and*
- ‘any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC’ (Annex I (c))*
- 4.2 In addition to the requirements of the SEA Directive, the statutory SA process requires the collection of additional information on social and economic characteristics of the plan area.

### Baseline Data Collection

- 4.3 Baseline information provides the foundation for predicting and monitoring effects and helps to identify sustainability problems and alternative ways of dealing with them. Sufficient information about the current and likely future state of the plan area is required to allow the plan’s effects to be adequately predicted.
- 4.4 Baseline data were collected about St Edmundsbury for a range of economic, social and environmental matters, looking at the Borough as it is today and identifying current trends. These data were summarised in the Sustainability Appraisal Scoping Report (October 2006) and its updated version (April 2007). Wherever possible, these data have been updated and relevant additional information added as part of the preparation of this Sustainability Appraisal Report. The baseline data collected to date are summarised below, with more detailed information contained in Appendix A. These data have allowed the identification of key issues for the Borough (see Table 5.1) and have largely determined the indicators listed in Table 6.1, together with the comments of consultees and inputs from other Stage A tasks. These indicators will be employed to measure the effects of implementation of the Core Strategy, thus forming a key part of the overall monitoring programme for the implementation of the LDF.
- 4.5 Baseline data were principally developed from indicators already used by SSAG in its monitoring work and from the DCLG (formerly ODPM) guidance. There are approximately 140 different indicators on a wide range of different environmental, economic and social issues. The baseline data collected included, wherever possible, trend information, comparable data for the county, East of England or England and any performance targets set for the borough in relation to the SSAG indicators.

### Baseline Information

#### Population

- 4.6 The ONS mid year population estimate for 2007 predicted the borough’s resident population to number 102,900 persons. 57% of the borough’s population in 2007 lived in the urban areas of Bury St Edmunds and Haverhill. Between 1991 and 2001, the population of the borough increased by 12%. This is greater than the Suffolk increase of 10% and the second greatest increase of all Suffolk’s districts. It had an estimated population density in 2002 of 150 people per square kilometre, compared to 284 for the East of England and 380 for England as a whole.

**Table 4.1 – 2001 Population and 10 year change between 1991 and 2001**

Area	2001 Population	5 Change
St Edmundsbury	98,193	12.1%
Bury St Edmunds	35,473	13.0%
Haverhill	22,010	17.8%
Rural St Edmundsbury	40,710	8.4%

Source: 2001 Census

- 4.7 The gender split in St Edmundsbury is more even than that of the East of England and England with female residents accounting for 50.4% of St Edmundsbury's population compared with 51.0% in the East of England and 51.3% in England at the 2001 Census.
- 4.8 Census data (2001) showed that the age profile of St Edmundsbury's population was similar to Suffolk and the East of England for the younger age groups (0-15, 16-24, 25-44) but that the proportion of the population aged 45-64 was lower than county and regional figures, and the proportion of people aged 65+ was higher than for Suffolk and the East of England. The 2007 mid-year population estimates showed that the age profile of St Edmundsbury broadly reflects that of the East of England.
- 4.9 Within St Edmundsbury there are marked variations between the two urban centres and the rural area at both ends of the age profile. However, the central age band (25-64 years) is very similar. In the rural areas in 2001 only 27% of the population was aged 0-24 compared to 33% in Haverhill. This situation is reversed for the 65+ population where 24% of the rural population fell into this age group compared to only 17% in Haverhill.

**Table 4.2 – Population by age (% of total population)**

Area	0	15-16	24 - 25	44 - 45	64 - 65	74 - 75+
St Edmundsbury	19.3	9.7	28.9	20.4	13.9	7.8
Bury St Edmunds	18.6	9.9	30.0	19.3	13.4	8.9
Haverhill	22.5	10.8	32.1	18.1	11.5	5.0
Rural St Edmundsbury	18.3	9.0	26.2	22.5	15.7	8.4
Suffolk	20.0	9.6	27.1	25.1	9.4	9.0
East of England	20.0	10.2	28.7	24.5	8.6	7.8

Source: 2001 Census

- 4.10 In St Edmundsbury the 65+ age group experienced the greatest increase between 1991 and 2001 with a 48% jump, this is more than four times the increase experienced in Suffolk and the region. Between 2002 and 2007, the growth in this age group has reduced to 15% but is still significantly higher than for the East of England. Within the borough, Bury St Edmunds experienced a 23% decrease in 16-24 year olds between 1991 and 2001 compared to a 20% and 25% fall in Haverhill and the rural area respectively. The largest increases occurred in the 65+ age group with Haverhill experiencing a 66% increase compared to 50% and 38% in rural St Edmundsbury and Bury St Edmunds respectively.
- 4.11 The mid-2004 population estimates from the Office of National Statistics indicate that 12.19% of the total population of St Edmundsbury are migrants. 5.19% of all people moved into the area from elsewhere in the UK compared to 0.72% of people who moved to the area from outside of the UK. The area experiences less out migration as only 4.58% of all people moved out of the area to elsewhere in the UK.

**Table 4.3 – Birth place 2001 (% of total population)**

	St Edmundsbury	East of England	England
Total Population	98,193	5,388,140	49,138,831
England	90.96%	89.93%	87.44%
Scotland	1.83%	1.63%	1.62%
Wales	1.09%	1.01%	1.24%
Northern Ireland	0.45%	0.4%	0.44%
Republic of Ireland	0.62%	0.87%	0.94%
Other EU Countries	1.25%	1.4%	1.41%
Elsewhere	3.8%	4.75%	6.91%

Source: 2001 Census

## Ethnicity

- 4.12 The population of St Edmundsbury borough is predominantly White, with 96.1% of the borough falling into this ethnic group in 2007. This is significantly higher than the average for the East of England and England as a whole, but can be seen to have decreased by almost 2% since 2001. The other main ethnic groups found within the borough are indicated in the tables below.

**Table 4.4 – Ethnic groups 2007 (% of total population)**

	St Edmundsbury	East of England	England
White	96.1	92.2	88.6
Mixed	1.0	1.5	1.6
Asian or Asian British	1.0	3.3	5.5
Black or Black British	0.9	1.8	2.8
Chinese or Other Ethnic Group	1.0	1.2	1.4

Source: 2001 Census

**Table 4.5 – Ethnic groups 2001 (% of total population)**

	St Edmundsbury	East of England	England
White British	94.81	91.45	86.99
White Other	3.22	3.67	3.93
Mixed	0.73	1.08	1.31
Asian or Asian British	0.47	2.26	4.58
Black or Black British	0.35	0.9	2.3
Chinese or Other Ethnic Group	0.42	0.65	0.89

Source: 2001 Census

## Deprivation

- 4.13 A National Index of Multiple Deprivation (IMD) has been produced by the Department of Communities and Local Government (DCLG) based on indicators such as education, health,



crime and employment used to rank relative deprivation for each local authority in England. St Edmundsbury borough was ranked as 267th in 2004, and 260th in 2007 out of the 354 local authorities, with 1 being the most deprived. Whilst the overall rank of St Edmundsbury is good, both the borough's score and ranking declined between 2004 and 2007, indicating that the borough became more deprived in comparison with the rest of the nation during this period. The rank scores for multiple deprivation by ward indicate that in 2004 Haverhill South (formally Clements ward) was the most deprived within the borough scoring 1,132 and the least deprived ward was that of Eastgate which scored 7,805 out of the 8414 wards in the UK. Although the rank of wards such as Haverhill South skew that data the overall rank of wards within St Edmundsbury of 5215 is very high reiterating that the borough is an affluent area with few pockets of deprivation.

## Health

- 4.14 Life expectancy from birth within the borough during the period 2004-2006 was 78.6 years for males and 82.7 years for females, consistently higher than the national average and higher than St Edmundsbury's life expectancy for previous years.
- 4.15 Overall residents within the borough and Suffolk as a whole are amongst the healthiest in the country. At the 2001 Census, the self-assessed health of residents of St Edmundsbury was similar to that of the East of England and better than that of England as a whole, with 70.9% of the borough assessing themselves as having good health. At ward level, no ward in the borough has a Standardised Mortality Rate (SMR) significantly higher than the Suffolk average. However, Kedington, Northgate and Haverhill South all have SMR values 25% above the pre-2003 Suffolk average whereas wards such as Cavendish, Honington and Pakenham have some of the lowest SMRs in the county. Furthermore, at the 2001 Census, the proportion of the Borough's population with a limiting long term illness (29.9%) was similar to that for the East of England (30.8%) and lower than that for the Country (33.6%).
- 4.16 St Edmundsbury has a significantly lower rate of teenage conception at 25.5 rate per 1000 girls when compared to the average for Suffolk which was recorded as 31 rate per 1000 girls (2000-2002 figures). However this overall low rate is not reflected in all wards within St Edmundsbury as St Olaves and Northgate wards both recorded high teenage conception rates of 57.7 and 53.4 respectively.

## Education and skills

- 4.17 The average percentage of year 11 students attaining 5 A\*-C grades at GCSE for St Edmundsbury was above both the regional and national averages in 2007 at 70.7%. The proportion of students gaining 5 A\*-C grades at GCSE in the borough is growing year on year, at approximately the same rate as England.

## Workforce skills

- 4.18 Around 36.3% of the working age population in St Edmundsbury had no qualifications in 2007. However, in the same year, 14,900 people of working age have NVQ level 4+ qualifications (degree or higher) accounting for 24.7%. The proportion of the population with NVQ 4+ qualifications increased by over 30% between 2004 and 2005 but decreased slightly between 2005 and 2007. The proportion with low/no qualifications is the highest amongst Suffolk's districts and is more than double than the regional and national averages. The proportion of the working age population with NVQ level 4+ qualifications in St Edmundsbury is slightly higher than the county average and slightly lower than the regional average.

## Crime and anti social activity

- 4.19 The crime rate for St Edmundsbury increased considerably from 69.6 (crimes per 1000 population) in 2003-4 to 81.1 in 2005-06. However, in 2007-08, the crime rate had dropped to 69.2 crimes per 1000 population. Crime rates in St Edmundsbury are consistently slightly lower than those observed regionally and nationally. Fear of crime within St Edmundsbury is fairly constant and similar to national figures, with around 98% of the borough's residents stating that they feel



fairly safe or very safe outside during the day and between 70% and 75% stating that they feel fairly safe or very safe outside after dark in 2006/07.

- 4.20 The rate of burglaries at 6.9 per 1000 of population in 2004-5 for St Edmundsbury is lower than the regional average of 7.5 and shows a continued decline from 9.1 in 2002-2003 to 8.4 in 2003-2004.
- 4.21 The rate of violent crimes in St Edmundsbury for 2004-5 is 14.8, marginally lower than the regional average of 16.6 (per 1000 population.)
- 4.22 The number of noise complaints made in St Edmundsbury has increased overall between 2002 and 2006. This increase is particularly notable with regards to domestic noise.

### **Access to services and facilities**

- 4.23 Many parishes in the rural areas of St Edmundsbury lack essential services. For example 68% of rural areas in 2004/05 did not have a food shop or general store and 67% did not have a post office. Nonetheless, 59% had a public house and 69% had a village or community centre. However, accessibility in St Edmundsbury is improving, with increases in the percentage of rural households within 13 minutes' walk of an hourly bus service (36% in 2005/06 compared with 23% in 2001/02) and the proportion of the population with access to hospital or GP or dentist surgery.
- 4.24 Analysis of access deprivation figures shows that the former Chevington ward is the least accessible in Suffolk and is ranked 43 out of 8414 wards in the country. Indeed, Clare is the only rural ward to achieve a high ranking. Even larger former rural wards such as Stanton and Barrow fell within the 15% most deprived wards in the country in terms of access.
- 4.25 However, despite many of the parishes lacking essential services this is less of a problem when households with cars/vans are taken into consideration. Within St Edmundsbury the percentage of households in 2001 with no car/van was 16.8 which was lower than the national average (27%) giving St Edmundsbury a rank of 281 out of 376. However this masks variations within the borough as several wards have significantly more households with no car/van such as Eastgate, where 36.4% of households had no car/van in 2001.
- 4.26 St Edmundsbury also promotes disability equality, and, in particular, strives to ensure that their services are accessible and responsive to different needs. The Bury St Edmunds Shopmobility scheme loans electric scooters and manual wheelchairs to people who may have difficulty walking around the town. The scheme has recently relocated and now offers more extensive services and longer opening hours. As a result, the number of people using the scheme has increased from almost 90 in April 2005 to over 140 in April 2006. All the Council documents are available in a variety of formats on request, including the production of Community Spirit (the quarterly newsletter) on audio tape/CD and a spoken version on the Council's website.

### **Employment**

- 4.27 The 2001 census shows that in St Edmundsbury 45.3% of economically active people aged 16-74 were in full time employment, higher than the national average of 40.6%. Unemployment within the borough reflected this as only 2.2% of economically active people were unemployed whereas the national average was 3.4%. Within the borough St Olaves ward has the highest level of unemployment, as 4.7% of economically active people were unemployed.
- 4.28 By 2008, the proportion of economically active people aged 16-74 in St Edmundsbury who were unemployed had increased to 1.6%. However this figure is still lower than regional and national unemployment rates.

### **Housing**

- 4.29 At the time of the 2001 census there were 40,560 households with residents in St Edmundsbury. Bury St Edmunds had 15,591 and Haverhill 9017.

- 4.30 By April 2004, 43,791 dwellings were identified in St Edmundsbury of which 814 (1.9%) were vacant and 1,501 (3.4%) were classed as unfit. This level of “unfitness” was below the national average of 4.8% but slightly higher than that for the East of England (3.1%).
- 4.31 At present 5,800 (15.5%) dwellings are estimated to have at least one Category 1 Hazard (as identified through the Housing and Safety Rating System). Category 1 Hazards relate to hazards to the health and safety of the occupier which must be dealt with. Category 1 Hazards are associated with pre-1919 dwellings, the privately rented sector, detached houses and bungalows. There is a clear association between Category 1 Hazards and low income households and those with heads of household over 60. The highest proportion of Category 1 Hazards by area was found in the Rural sub-area at 24.8% followed by the Bury St Edmunds sub-area at 13.4%.

**Table 4.6 – Housing Tenure**

Housing Tenure	St Edmundsbury	East of England	England and Wales
Owner occupied :owns outright	29.8	30.7	29.5
Owner occupied: with a mortgage or loan	40.7	41.5	38.8
Rented from: council (Local Authority)	13.8	11.6	13.2
Rented from: Housing Association/Registered social landlord	3.4	4.9	6.0
Rented from: private landlord/letting agency	7.5	7.6	8.7
Rented from: other	4.4	3.2	3.2

Source: 2001 Census

- 4.32 The results of the 2001 census show that overall housing tenure in St Edmundsbury reflects that of the national average. However marginal differences indicate that there is a higher percentage of owner occupied households in the borough, principally with a mortgage or loan.
- 4.33 The most significant difference in St Edmundsbury from the national average was in the number of households that were rented from Housing Association/registered social landlord. This accounts for only 3.4% of households in St Edmundsbury compared to 6% nationally. Although this was the most apparent deviance from the national averages it was in line with trends identified throughout the east of England. This was not the case for the number of households rented from the council, where St Edmundsbury shows a higher percentage (13.8%) than that of the national average (13.2%) but more noticeably higher than that found over the East of England in general (11.6%). However, since 2001 the local authority housing stock has been transferred to the Havebury Housing Partnership.

**Table 4.7 – Household Composition**

Household Composition	Percentage
% Single person	13.3%
% pensioners	23.9%
Married/co-habiting couple – no children	22.4%
Married/co-habiting couple – with children	22.4%
Lone parent with children	4.7%

Source: 2001 Census

- 4.34 In St Edmundsbury the number of households on the housing register (the waiting list) as at 1 April 2003 was 2,813, of these, 146 households had been accepted as homeless.

## **Housing Provision for Gypsies and Travellers and those with Special Needs**

- 4.35 In 2006, there were two private and no public authorised pitches for Gypsies and Travellers. This level of pitch provision is considered to be insufficient for the borough.
- 4.36 The proportion of housing completions (number of units built annually) in St Edmundsbury which are appropriate for those with special needs fluctuates greatly but is commonly between 10% and 15% of all housing completions in the borough.

## **The quality of neighbourhoods and community participation**

- 4.37 St Edmundsbury has a relatively high level of satisfaction for 'residents who are happy with their neighbourhood as a place to live'. 38% of residents of the borough were very satisfied and 48% fairly satisfied (Suffolk Speaks survey) which is higher than the county average. In terms of community participation, although the turnout to local authority elections has fallen since the 1990s, there are a number of active community and residents groups operating across the borough. Parish communities have only completed nine Parish Plans. The completion or participation level in the production of these plans, which set down the thoughts of the community on local issues, is relatively poor compared with other Suffolk authorities.

## **Landscape and biodiversity**

- 4.38 The landscape of St Edmundsbury is a predominantly rural, with every village having a population of under 3,000 and two major towns of Haverhill and Bury St Edmunds. The borough is an area of unspoiled natural beauty with a keen sense of its rural heritage. Many villages have an important historic character, with thatched and timber framed cottages common; Clare and Cavendish are perhaps the two best known.
- 4.39 The borough includes one Special Protection Area (SPA) (Breckland), two Special Areas of Conservation (SAC) (Breckland and Waveney & Little Ouse Valley Fens), 23 Sites of Special Scientific Interest (SSSI), 144 County Wildlife Sites, two Local Nature Reserves (LNR) and three Country Parks.
- 4.40 The majority of the SSSIs in the borough are partly in an unfavourable or mixed condition. However, 20 of the 23 SSSIs are meeting their Public Service Agreement (PSA) targets (i.e. are in favourable or unfavourable but recovering condition) in over half of their areas. The SSSIs located in St Edmundsbury are listed below:
- Barnham Heath
  - Black Ditches, Cavenham
  - Blo' Norton And Thelnetham Fen
  - Bradfield Woods
  - Breckland Farmland
  - Breckland Forest
  - Bugg's Hole Fen, Thelnetham
  - Cavendish Woods
  - Fakenham Wood And Sapiston Great Grove
  - Hay Wood, Whepstead
  - Hopton Fen
  - Horringer Court Caves
  - Knettishall Heath
  - Lackford Lakes

- Little Heath, Barnham
- Pakenham Meadows
- Shaker's Lane, Bury St. Edmunds
- Stanton Woods
- The Glen Chalk Caves, Bury St. Edmund's
- Thetford Heaths
- Trundley And Wadgell's Wood, Great Thurlow
- West Stow Heath
- Weston Fen

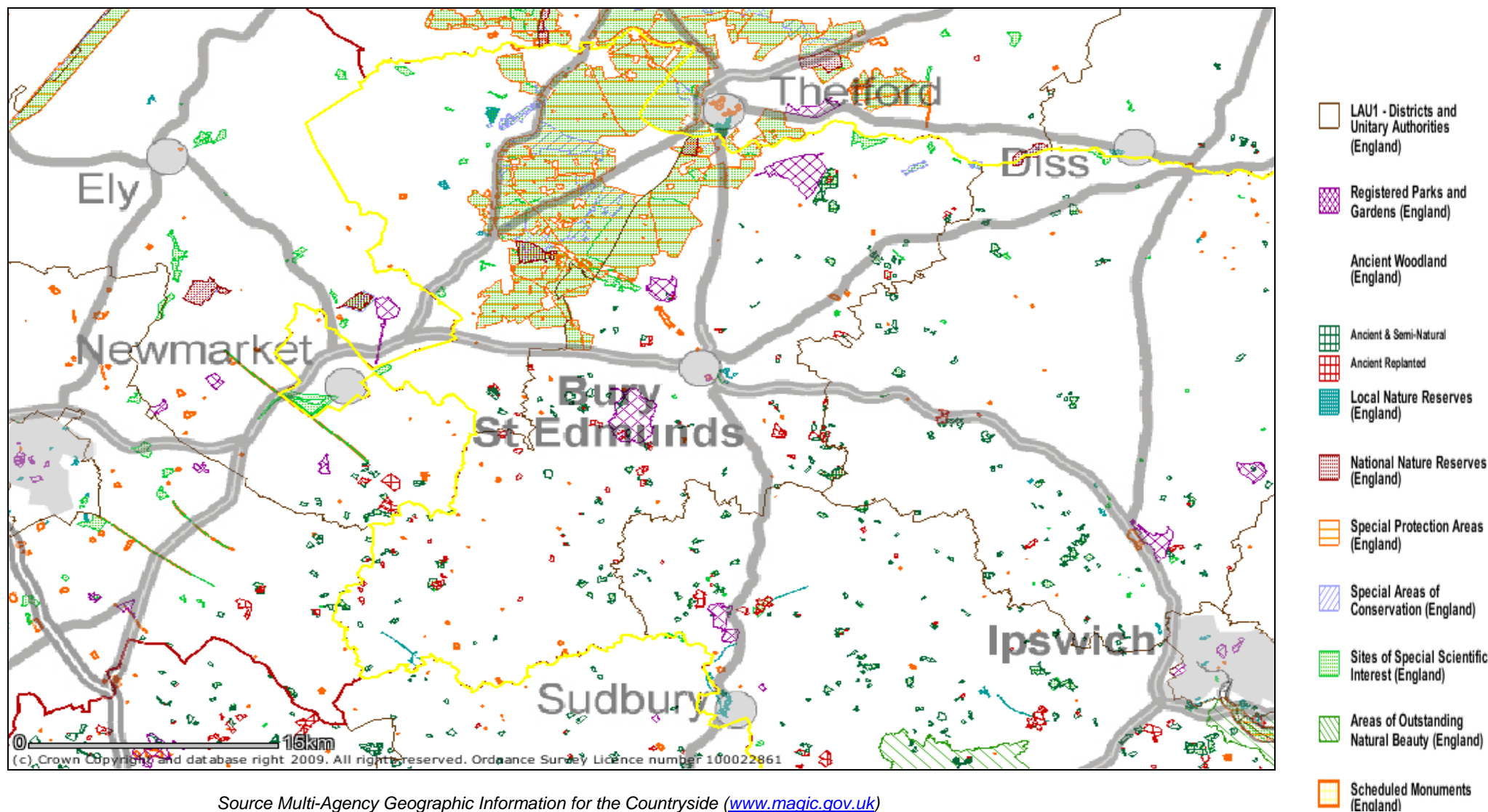
4.41 A Landscape Characterisation Study undertaken by Suffolk County Council identified 14 landscape types within St Edmundsbury, the characters of which are distinct and individually important to the character of the Borough. These landscape types are:

- Ancient plateau claylands
- Estate sandlands
- Plateau estate farmlands
- Rolling estate farmlands
- Rolling estate sandlands
- Rolling valley farmlands
- Rolling valley farmlands & furze
- Undulating ancient farmlands
- Undulating estate farmlands
- Urban
- Valley meadowlands
- Valley meadows & fens
- Wooded chalk slopes
- Wooded valley meadowlands & fens

4.42 The majority of farmland in the borough is either Grade 2 or 3 which are generally considered to be the best and most versatile types of agricultural land. This agricultural land is therefore a valuable resource within St Edmundsbury.

4.43 Figure 4.1 shows the main environmental designations in the borough.

Figure 4.1 – Environmental Designations in St Edmundsbury



## Historic and archaeological environment

- 4.44 Bury St Edmunds is a medieval town which grew up around the gates of the Benedictine monastery founded in 1020AD. It retains a Norman town plan, in which the main streets led to the Abbey precinct. During the 14th century Bury St Edmunds developed into a prosperous market town. The Abbey was raided and torn down in the 16th century, its remnants are all around the town, standing as ruins or built into the homes of opportunistic townspeople. The Abbey gardens surround many of the ruins and are the town's most popular attraction. Many secular mediaeval buildings such as the Guildhall still stand, but most are hidden behind elegant 17th and 18th century facades.
- 4.45 Haverhill is the second largest town in the borough and has the distinction of having been a market town for 950 years. Between 1851 and 1901 the town almost doubled in size producing a complete Victorian town with new houses, schools, churches and public buildings. More recently the town experienced another major growth period as a consequence of The Town Development Scheme of the 1960's.
- 4.46 Within the borough there are more than 3000 listed buildings of which over 1000 are in Bury St Edmunds itself. The proportion of the listed buildings in St Edmundsbury which are at risk has decreased from 1% in 2003 to 0.5% in 2008. The borough also contained 25 Conservation Areas and 1015 properties under Article 4 Directions in 2008. Bury St Edmunds is recognised as a town of considerable archaeological importance and the remains form an essential and valuable part of Suffolk's identity.

## Water and air quality

- 4.47 The quality of water within the borough's rivers is generally fair to good in terms of chemical and biological quality. Despite recent improvements, the chemical quality of St Edmundsbury's rivers is worse than the average quality of rivers in the East of England and England.
- 4.48 Air quality is also generally good within St Edmundsbury with no Air Quality Management Areas (AQMAs) having been designated within the borough.

## Flood Risk

- 4.49 Whilst a very low proportion of property in St Edmundsbury is at risk of flooding, Bury St Edmunds, Haverhill and many of the borough's villages are located in river valleys. Historic evidence has demonstrated that extreme weather conditions have the potential to cause damage through flooding. However, in recent years, very few planning applications for development in flood risk areas in St Edmundsbury have been approved against Environment Agency advice.

## Soil resources

- 4.50 One method of protecting soil resources is to reduce the amount of new housing development taking place on greenfield land and focus development on previously developed land. The borough percentage of development on previously developed land is low in relation to the Government target of 60%. However the target of 40% set in the Replacement St Edmundsbury Local Plan has been exceeded in recent years, with 54.4% of dwellings completed in St Edmundsbury in 2007/8 being located on PDL. The Draft East of England Plan states that the borough has to provide 10,000 houses over the period to 2021 – it is unlikely that this can be achieved without the need to develop greenfield sites.

## Waste

- 4.51 The amount of household waste collected per head in St Edmundsbury has reduced since 2004/05 but is higher than the national mean.
- 4.52 In 2005/06 St Edmundsbury was the top performing council in terms of recycling and composting in the country. St Edmundsbury's recycling rate in the first and second quarter of 2008/09 was at 54%. In 2006/07 St Edmundsbury's recycling rate was 50.4% compared with an average of 31% across the rest of the country.



- 4.53 St Edmundsbury was awarded Beacon Council status in 2001 and 2006 by the Government. This award recognised that St Edmundsbury was a national leader in the field of waste management and recycling. Since then the council has been involved in helping other councils across the country to improve their recycling rates.
- 4.54 St Edmundsbury is also part of the Suffolk Recycling Consortium, a partnership of six Suffolk district and borough councils and Viridor Waste Management. Through the work of the consortium the total amount of waste material recycled is 36,000 tonnes per year – representing a recycling rate across the Consortium of approximately 30%. By working together with all Suffolk councils St Edmundsbury has helped achieve significant improvements in recycling rates across the county.

### Traffic

- 4.55 Traffic volumes increased year on year between 1996 and 2004 with a small decrease in 2005. It is considered that the majority of traffic is caused by an increase in car use, particularly for the journey to work.
- 4.56 The 2001 Census revealed that of all people in the borough aged 16 – 74 in employment 62.45% usually travel to work by driving a van or car. This is higher than the levels for both Suffolk as a whole (60.57%) and the East of England (58.87%).

### Commuting patterns

- 4.57 The 2001 Census provides the only comprehensive assessment of commuting across the whole of the country. The data shows that a large majority of people who live in St Edmundsbury also work in the borough (71%), furthermore 76% of the borough's residents work within Suffolk and 92% work within the East of England. The district of Forest Heath has the greatest number of commuters from St Edmundsbury with over 2,200 people or 4.5% of the borough's working age population. Outside of Suffolk the district with the greatest number of commuters from St Edmundsbury is Cambridge with 2130 commuters or 4.2% of the resident working age population, furthermore the South East Cambridgeshire area as a whole accounts for over 9% (over 4,600 people) of commuters from St Edmundsbury. Only 751 people (1.5%) commute to London from the borough and 644 (1.3%) commute outside the region.

Table 4.8 – Commuting destinations from St Edmundsbury 2001

Commuting Destinations	People
Babergh	881
Forest Heath	2,223
Ipswich	621
St Edmundsbury	35,515
Suffolk Coastal	162
Waveney	21
Suffolk	38,012
Bedfordshire	56
Cambridgeshire	4,630
Essex	1,612
Hertfordshire	338
Norfolk	1,279
East of England	45,927
London	751



Other Regions	337
Outside UK	128

Source: 2001 Census

## Energy consumption and climate change

- 4.58 St Edmundsbury's consumption of electricity is high for domestic use. Figures indicate that average domestic energy consumption in the borough is above both that for the East of England and Great Britain with an average annual domestic energy consumption in St Edmundsbury in 2006 of 4954 kWh compared with an average of 4873 kWh for East of England and 4628 kWh for Great Britain over the same period. However, domestic energy consumption in the Borough decreased year on year between 2003 and 2006.
- 4.59 Average energy consumption by industry in St Edmundsbury in 2004 was slightly below that for the East of England and significantly less than figures for Great Britain. However, by 2006, average energy consumption per consumer for industrial and commercial use had risen from the 2004 figures. Despite similar increases in industrial consumption in the East of England and Great Britain, St Edmundsbury's average consumption per consumer by 2006 was above the regional and national figures. This is likely to be a result of recent industrial growth in Haverhill.
- 4.60 Consumption of gas by domestic users within the borough is consistently less than the average for the East of England and Great Britain. However industrial gas consumption is relatively high. Available figures appear to show increasing consumption of gas by domestic uses over recent years.

## Renewable energy

- 4.61 There are no commercial renewable energy facilities within the borough.

## Carbon Dioxide emissions

- 4.62 Domestic CO<sub>2</sub> emissions have decreased in St Edmundsbury but at 2.43 tonnes per capita in 2006 are comparable to regional but higher than national figures (2.48 tonnes and 2.54 tonnes respectively in 2006). Total emissions decreased between 2005 and 2003 but in 2006 rose to above the 2004 levels. The proportion of the borough's CO<sub>2</sub> emissions which result from industrial and commercial operations is consistently above national figures, reflecting the industrial nature of St Edmundsbury.

## Business formations

- 4.63 The table below presents the most recent data on registrations and de-registrations and also calculates the business formation rate i.e. registrations as a % of stock. During the 1990s the rate of formations in St Edmundsbury was consistently below the regional rate. However in recent years this has changed; in 2004 St Edmundsbury's rates were in line with the regional rate but by 2007 the formation rate in the borough had dropped to below that of the East of England.

**Table 4.9 – VAT registrations and De-registrations in 2007**

Area	Registrations	De-registrations	Stocks at end of year	Net-change	Business Formation Rate
Babergh	285	235	3,650	55	7.8
Forest Heath	215	185	2,240	30	9.6
Ipswich	290	245	2,990	45	9.7
Mid Suffolk	315	265	4,325	45	7.3
St Edmundsbury	320	265	3,955	55	8.1
Suffolk Coastal	365	305	4,700	60	7.8
Waveney	245	200	3,095	45	7.9
Suffolk	2,030	1,690	24,955	335	8.1
East of England	19,720	14,695	199,630	5,025	9.9

Source: ONS

**Table 4.10 – VAT registrations and De-registrations in 2004**

Area	Registrations	De-registrations	Stocks at end of year	Net-change	Business Formation Rate
Babergh	285	285	3,420	0	8.3
Forest Heath	225	235	2135	-10	10.5
Ipswich	295	270	2800	25	10.5
Mid Suffolk	320	290	3945	30	8.1
St Edmundsbury	345	280	3600	65	9.6
Suffolk Coastal	350	380	4290	-30	8.2
Waveney	230	225	2885	5	8.0
Suffolk	2050	1970	23075	80	8.9
East of England	17,580	17,495	183,675	85	9.6

Source: ONS

## House Prices

- 4.64 The average house price in St Edmundsbury in the second quarter of 2008 was £197,503. In both 2006 and 2005, St Edmundsbury was the third most expensive borough in Suffolk. House prices in the borough have increased year on year with a price increase of 2.7% between 2005 and 2006 and by 29% between 2003 and 2006, suggesting a reduction in house price growth in recent times.

**Table 4.11 – Housing Prices in 2006**

Area	Flats	Terraced	Semi-detached	Detached	Average
St Edmundsbury	£116,447	£151,414	£167,861	£269,508	£193,424
Suffolk	£120,859	£134,232	£151,949	£254,389	£176,076

East of England	£136,746	£159,782	£187,197	£294,411	£199,997
England	£181,025	£155,238	£177,091	£299,023	£194,046

Source: Land Registry

**Table 4.12 – Short and medium term house price changes**

Area	2005-06 % Change	2003-06 % Change
St Edmundsbury	2.7	28.8
Suffolk	0.9	25.8
East of England	2.5	22.4
England	5.2	33.2

Source: Land Registry

## Housing Affordability

4.65 Housing affordability has become a key issue in recent years due to dramatic house price inflation since 2001.

4.66 The most widely used method to determine affordable housing, is the Housing Affordability ratio. This determines the affordability of housing by comparing the average house price for each housing category against average incomes. The calculation assumes a 5% deposit therefore the ratio is that of average house price multiplied by 95% to average income. The housing affordability ratio for St Edmundsbury has increased dramatically from 6.53 in 2003 to 8.86 in 2006/07 and is higher than that for the East of England. It is evident from table below that housing affordability in St Edmundsbury is poor.

**Table 4.13 – Housing Affordability for 1<sup>st</sup> Quarter 2006**

Area	Detached Ratio	Semi Detached Ratio	Terraced Ratio	Flats/ Maisonettes Ratio	*Average Ratio
Babergh	11.65	7.18	6.63	4.5	8.53
Forest Heath	10.99	6.24	5.13	4.26	7.2
Ipswich	9.63	5.61	5.14	5.59	5.99
Mid Suffolk	11.69	6.78	5.79	4.29	8.35
St Edmundsbury	10.97	6.83	6.16	4.74	7.87
Suffolk Coastal	10.13	6.02	5.52	4.44	7.32
Waveney	9.5	6.69	5.52	4.64	7.07
Suffolk	10.49	6.27	5.54	4.98	7.26
East of England	10.51	6.68	5.7	4.88	7.14
England	10.53	6.23	5.46	6.37	6.83

\*The average column represents housing affordability across all housing groups.

Source: Suffolk Observatory

4.67 However 25% of housing completions in St Edmundsbury in 2007/08 were for affordable housing, compared with the East of England where the proportion of housing completions which are affordable is consistently below 20%.

## Economic Activity and Employment Rates

- 4.68 The economically active population includes those people who are employed, self-employed, unemployed and some students. In St Edmundsbury there is an economic activity rate (EAR) of 83.8% (51,000 people). St Edmundsbury's EAR is significantly greater than the county and regional average and the fourth highest in the county.
- 4.69 The employment rate is defined as the proportion of the working age population in employment. As with economic activity, St Edmundsbury has the third highest rate amongst the districts in Suffolk (after Babergh and Forest Heath) at 82.1%.

Table 4.14 – Economic Activity and Employment Rates

Area	Economic Activity Rate (%)	Employment Rate (%)
Babergh	85.9	84.8
Forest Heath	86.7	82.5
Ipswich	79.7	75.1
Mid Suffolk	81.8	79.8
St Edmundsbury	83.8	82.1
Suffolk Coastal	79.7	78.8
Waveney	78.8	76.1
Suffolk	81.8	79.4
East of England	82.0	78.9

Source: Labour Force Survey

## Employment Structure

- 4.70 In 2004 there were 51,515 people in employment in St Edmundsbury. Bury St Edmunds accounts for 58% of total employment and Haverhill 17%. The three largest sectors in the borough (public, manufacturing and distribution) account for 73% of total employment. In 2006, these sectors accounted for 72% of total employment, showing that the proportion of people employed in public, manufacturing and distribution sectors is relatively stable. There are major differences in employment between the borough's principal urban areas of Bury St Edmunds and Haverhill. Haverhill is more industrial in nature with more than three times the proportion of manufacturing employment compared to Bury which is dominated by public sector employment accounting for almost one third of total employment.

Table 4.15 – Employment by sector, 2004

	St Edmundsbury		Bury St Edmunds		Haverhill	
	Number	%	Number	%	Number	%
Agriculture	741	1.4	5	0	0	0
Energy	-	-	266	0.9	0	0
Manufacturing	9369	18.1	3338	11.2	3234	36.2
Construction	2387	4.6	1232	4.1	324	3.6
Distribution	12854	24.8	8088	27	1948	21.8
Transport	1697	3.3	674	2.3	401	4.5
Banking	6937	13.4	3994	13.4	1241	1241

Public Administration	15478	29.9	11076	37	1445	16.2
Other	2052	4	1243	4.2	339	3.8
Total	51515	100	29916	100	8932	100

Source: Annual Business Inquiry

- 4.71 Total employment in St Edmundsbury (across all sectors) increased by 9.4% between 1998 and 2004. This is higher than both the regional and county averages. Changes in employment by sector vary significantly within St Edmundsbury (see table below). St Edmundsbury experienced major growth in two sectors between 1998 and 2004; banking, finance and insurance (53.5% increase) and public administration, education and health (22.4% increase). However, between 2004 and 2006, the growth in these sectors was negligible, and the greatest growth rate was observed in the construction (8.7%) and transport and communications (6.1%) sectors. Manufacturing has continued to decline although at a slower rate in recent years, registering a 19.8% fall in employment between 1998 and 2004 and a 4.4% fall between 2004 and 2006. Whereas between 2004 and 2006, the agriculture and fishing sector registered the largest reduction (7.1%), the most significant fall between 1998 and 2004 was experienced in energy and water which fell by 38.4%

**Table 4.16 – Sector growth within St Edmundsbury 2004-2006**

Sector	Sector % Change ('04 to '06)
Agriculture and Fishing	-7.1
Energy and Water	Data not available
Manufacturing	-4.4
Construction	8.7
Distribution, hotels and restaurants	0
Transport and communications	6.1
Banking, finance and insurance, etc	-0.8
Public Administration, education and health	0.3
Other	7.5

Source: Calculated from historic SEBC Annual Monitoring Reports

**Table 4.17 - Sector growth within St Edmundsbury 1998-2004**

Sector	Sector % Change ('98 to '04)
Agriculture and Fishing	-0.9
Energy and Water	-38.4
Manufacturing	-19.8
Construction	14.7
Distribution, hotels and restaurants	4.6
Transport and communications	0.2
Banking, finance and insurance, etc	53.5
Public Administration, education and health	22.4
Other	1.5

Source: Annual Business Inquiry

## Unemployment

- 4.72 In recent years St Edmundsbury, along with most areas in the UK, has experienced historically low unemployment rates. In July 2008, 1.6% of the population of St Edmundsbury was unemployed. Despite an increase in recent years, unemployment levels for St Edmundsbury remain well below regional and national levels. Haverhill has significantly higher unemployment than the rest of the borough.

**Table 4.18 – Unemployment rate within St Edmundsbury June 2006**

Area	Rate (%)
St Edmundsbury	1.7
Bury St Edmunds	1.8
Haverhill	2.8
Rural St Edmundsbury	0.9
Babergh	1.3
Forest Heath	1.1
Ipswich	3.5
Mid Suffolk	1.1
Suffolk Coastal	1.1
Waveney	3.3
Suffolk	2.0
East of England	2.0

Source: ONS

## Earnings

- 4.73 Gross average earnings in St Edmundsbury in 2005 were £449 per week. The borough's earnings are significantly lower than the county and regional averages. However earnings increased by 5.9% between 2004 and 2005, above the county average of 3%. This growth was also significantly better than growth at regional and national level at 3% and 3.8% respectively.
- 4.74 Gross median weekly earnings have also increased from in £318 in 2002 to £421 in 2007 but are also below regional and national median earnings.
- 4.75 The earnings figures in the table below relate to gross earnings for full-time employees.

**Table 4.19 – Average Earnings for 2005**

Area	Gross Weekly Pay (£)	Hourly Pay (£)
Babergh	429	10.75
Forest Heath	434	10.67
Ipswich	456	11.57
Mid Suffolk	420	10.05
St Edmundsbury	449	11.14
Suffolk Coastal	488	11.62
Waveney	375	9.28
Suffolk	443	10.93

East of England	512	12.8
Great Britain	519	13.18

Source: Suffolk Observatory



## 5. Key Sustainability Issues

### Introduction

- 5.1 The identification of the key sustainability issues most relevant to the Core Strategy has been based on the review of relevant plans and programmes documented in Section 4, the analysis of the baseline data documented in Section 5 and Appendix A, and a consideration of issues likely to be addressed in the Core Strategy.
- 5.2 Table 5.1 presents the full results of the analysis of key sustainability issues, which are briefly summarised as:
- Significant Historic and Future Population Growth;
  - Relatively Low Education and Qualification Attainment;
  - Localised Deprivation;
  - Fluctuating Crime Rate;
  - Insufficient Amount of Housing, including Affordable Housing and High Levels of Unfit Dwellings;
  - Lack of Accommodation Provision for Gypsies and Travellers;
  - Earnings below Regional Figures;
  - Increase in Noise Complaints;
  - Pressure on Rich Biodiversity;
  - Presence of Sites Designated for their Geological/ Geomorphological Value;
  - Pressure on Landscape;
  - Rich Archaeology and Cultural Heritage;
  - Need to Improve Water Quality;
  - Pressure on Water Resources;
  - Comparatively High Levels of Waste Arisings;
  - Potential for Flood Risk;
  - Need to Adapt to Changing Climate;
  - High Energy Consumption;
  - High CO<sub>2</sub> Emissions per Capita;
  - Need to Preserve Valuable Land and Soil;
  - Presence of Contaminated Land;
  - Low Completions on Previously Developed Land;
  - High traffic volume and reliance on private car;
  - Changing Employment Sectors; and
  - Fluctuating Business Formation Rates.

Table 5.1 – Key Sustainability Issues

No	Key Issues	Implications and Opportunities for Core Strategy	SEA Topic	SA Objective
<b>SOCIAL ISSUES</b>				
1.	<p><b>Significant Historic and Future Population Growth</b></p> <p>The population of St Edmundsbury has grown significantly over the past two decades (by 16.9%). This growth is expected to continue, particularly with the identification of Bury St Edmunds as a key centre for development and change in the East of England Plan (Policy BSE1).</p> <p>Historic growth in the number of older people in the Borough (+14.7% over 2002-07) has been significantly higher than that experienced in the East of England as a whole (+8.8% over 2002-07). However, the age profile of St Edmundsbury broadly reflects that of the East of England.</p> <p>43% of the borough's population live in rural areas. This is an unusually high proportion (23% of England's population live in rural areas), and reflects the largely rural nature of the borough.</p>	<p>Opportunity for the Core Strategy to ensure that likely future population growth is supported by the provision of sufficient additional housing, employment opportunities and services to ensure that the borough grows in a sustainable manner.</p> <p>Opportunity for the Core Strategy to ensure that new developments are appropriate for all sectors of the population, particularly older people.</p> <p>Opportunity for the Core Strategy to ensure that development in rural areas is sustainable through ensuring sufficient provision of new housing, employment and services to meet the needs of local people while at the same time protecting the open countryside. New development should also aim to promote sustainable transport modes.</p>	Population	4, 5, 6, 7
2.	<p><b>Relatively Low Education and Qualification Attainment</b></p> <p>The percentage of St Edmundsbury's population with no qualifications is more than double the figures for the East of England and England.</p>	<p>Opportunity for the Core Strategy to ensure that sufficient high quality educational facilities are included within proposed developments and that accessibility to educational facilities is enhanced.</p>	Population	2
3.	<b>Localised Deprivation</b>			

	<p>Deprivation in St Edmundsbury is increasing, with the borough's IMD rank having decreased from 267 in 2004 to 260 in 2007. However, deprivation is not evenly located throughout the borough. The IMD rankings show that LSOAs in Haverhill are more consistently deprived; suggesting that deprivation in Haverhill is more widespread rather than just concentrated in small pockets.</p> <p>Furthermore, levels of deprivation in the rural areas of St Edmundsbury have increased both relative to elsewhere in England and in terms of actual scores.</p>	<p>Opportunity for the Core Strategy to reduce deprivation through the provision of appropriate housing and job opportunities which suit the skills of the local workforce. The Core Strategy should also ensure that sufficient education and health facilities are included within proposed developments, particularly those located in rural areas where service provision is less extensive.</p>	<p>Population, Human Health</p>	<p>1, 2, 4, 5, 20</p>
4.	<p><b>Fluctuating Crime Rate</b></p> <p>Trend data shows a fluctuating crime rate in the borough. Although a significant reduction in crime was observed between 2005/06 and 2007/08, prior to this the borough had experienced an increasing crime rate trend.</p>	<p>Opportunity for the Core Strategy to ensure that the recent drop in crime rates continues through the designing out of crime. This could be achieved by measures such as the mixing of house types and sizes, the appropriate location of public and private open space and the network of routeways, particularly for non-motorised users, incorporating natural surveillance considerations.</p>	<p>Population, Human Health</p>	<p>3</p>
5.	<p><b>Insufficient Amount of Housing, including Affordable Housing and High Level of Unfit Dwellings</b></p> <p>Although the number of housing completions in St Edmundsbury in 2006/07 was above the H1 policy target included in the East of England Plan, in previous years the number of completions has not reached the target level.</p> <p>The uptake of housing benefits has steadily increased since 2003, suggesting that there is insufficient affordable housing available within St Edmundsbury. Furthermore, the housing affordability ratio of the borough has increased steadily since 2003, indicating major housing</p>	<p>Opportunity for the Core Strategy to ensure that sufficient provision is made for the additional housing required to meet the targets set by policy H1 of the East of England Plan.</p> <p>Opportunity for the Core Strategy to encourage the provision of affordable housing through the inclusion of a policy detailing a required proportion of new developments to be affordable. There is a need for the Core Strategy to ensure that housing supply matches projected demand both in terms of numbers and type.</p>	<p>Population, Material Assets</p>	<p>4, 7</p>

	affordability problems, particularly as a result of year-on-year increases in house prices.			
6.	<b>Lack of Accommodation Provision for Gypsies and Travellers</b> St Edmundsbury had 2 gypsy and traveller pitches in 2006. As such, the borough is not on track to reach its East of England Policy H4 target which requires 17 pitches in St Edmundsbury by 2011.	Opportunity for the Core Strategy to include a policy setting out the Council's requirement for gypsy and traveller pitch provision.	Population, Human Health, Material Assets	7
7.	<b>Earnings below Regional Figures</b> Whilst average earnings within St Edmundsbury have increased over recent years, they are still below figures for the East of England and England. Furthermore, median wage figures indicate that there are an above average number of low paid jobs in the borough.	Opportunity for the Core Strategy to promote the creation of an environment appropriate for attracting investors into the borough. Opportunity for the Core Strategy to encourage higher paid employment opportunities whilst ensuring that the created jobs are appropriate for the skills of the resident population.	Population, Human Health, Material Assets	4, 6
8.	<b>Increase in Noise Complaints</b> The number of noise complaints made by residents of and visitors to the borough has increased overall between 2002 and 2006. This increase is particularly notable with regards to domestic noise.	Opportunity for the Core Strategy to ensure that noisy land uses are located away from residential areas. Opportunity for the Core Strategy to promote the use of landscaping and attenuation bunds to reduce the impact of noise-creating activities.	Population, Human Health	1, 3
<b>ENVIRONMENTAL ISSUES</b>				
9.	<b>Pressure on rich Biodiversity</b> St Edmundsbury contains a number of sites designated for their internationally important ecology. These are: <ul style="list-style-type: none"> <li>• Breckland SPA;</li> <li>• Breckland SAC; and</li> <li>• Waveney &amp; Little Ouse Valley Fens SAC.</li> </ul>	Opportunity for the Core Strategy to ensure that the habitats and species of the large number of designated sites within the borough are protected from destruction and loss and, where possible, are enhanced. The settings of the sites should be safeguarded and nearby developments should be screened to reduce the visual impact.	Biodiversity, Flora, Fauna	8, 16

	<p>The borough also contains a number of SSSIs, National Nature Reserves, County Wildlife Sites, Local Nature Reserves and Country Parks. Although these sites are considered to be of significant ecological value, their integrity, and the habitats and species that they support are under pressure from the high level of development required in order to meet growth targets set within the East of England Plan.</p> <p>The majority of the ecological SSSIs in the borough are partly in an unfavourable or mixed condition with 2 of the Borough's 23 SSSIs wholly in an unfavourable and deteriorating condition.</p> <p>There are a large number of designated BAP habitats and species in Suffolk, many of which will be present in St Edmundsbury. It is necessary that any permitted development does not detrimentally affect these habitats and species.</p>	<p>Opportunity for the Core Strategy to promote the designated sites for their amenity and recreational value through the encouragement of appropriate interpretation or visitor provision.</p>		
10.	<p><b>Presence of Sites Designated for their Geological/ Geomorphological Value</b></p> <p>St Edmundsbury Borough contains two geological SSSIs (Thetford Heaths and Breckland Forest) and one Regionally Important Geological Site near Thelnetham. Whilst available data suggests that the condition of these sites is favourable at present, pressures from development may put the condition of the sites at risk.</p>	<p>Opportunity for the Core Strategy to ensure that the geology of the designated sites within the borough is protected from destruction and loss and, where possible, is enhanced. The settings of the sites should also be safeguarded.</p> <p>Opportunity for the Core Strategy to promote the designated sites for their amenity and recreational value through the encouragement of provision of visitors' centres and educational facilities at the sites.</p>	Soil, Landscape	8, 16
11.	<p><b>Pressure on Landscape</b></p> <p>The borough contains 14 landscape types, the</p>	<p>Opportunity for the Core Strategy to encourage the</p>		

	<p>characters of which are distinct and individually important to the character of the Borough. Development pressures (e.g. suburbanisation, transport and industrial developments, agricultural rationalisation and tourism related development) as a result of past and projected future development within the borough have placed, and are likely to continue to place significant pressure on the landscape of St Edmundsbury. These landscape types are:</p> <ul style="list-style-type: none"> <li>• Ancient plateau claylands</li> <li>• Estate sandlands</li> <li>• Plateau estate farmlands</li> <li>• Rolling estate farmlands</li> <li>• Rolling estate sandlands</li> <li>• Rolling valley farmlands</li> <li>• Rolling valley farmlands &amp; furze</li> <li>• Undulating ancient farmlands</li> <li>• Undulating estate farmlands</li> <li>• Urban</li> <li>• Valley meadowlands</li> <li>• Valley meadows &amp; fens</li> <li>• Wooded chalk slopes</li> <li>• Wooded valley meadowlands &amp; fens</li> </ul>	<p>preservation of the borough's distinct landscape types in order to ensure that the integrity and high landscape value of St Edmundsbury is not lost.</p> <p>The quality of the wider settings of the landscape types should be preserved and enhanced with sympathetic development adjacent to designated sites which blends with the environment.</p>	Landscape	18
12.	<p><b>Rich Archaeology and Cultural Heritage</b></p> <p>St Edmundsbury contains over 3,000 listed buildings and a large number of historic parks and gardens,</p>	<p>Opportunity for the Core Strategy to require continued protection of sites designated for their archaeological,</p>	Cultural Heritage	17

	scheduled monuments, conservation areas and Article 4 Directions. It is vital that these valuable assets continue to be protected.	historical and cultural value, particularly against pressures from development. The settings of these sites should also be safeguarded. The Core Strategy should consider opportunities to conserve and rejuvenate historic features and places. Careful consideration should also be given to non-designated historic features.		
13.	<b>Need to Improve Water Quality</b> The proportion of St Edmundsbury's rivers that were assessed as having good chemical water quality in 2005 was higher than in 2004 and 2003. However, the chemical quality of St Edmundsbury's rivers is worse than the average quality of rivers in the East of England and England. The biological water quality of the rivers in St Edmundsbury is higher, however, with none of the boroughs rivers being assessed as having poor or bad biological quality in 2004 and 2005.	Opportunity for the Core Strategy to promote the inclusion of Sustainable Urban Drainage Systems (SUDS) on new developments, thereby helping to improve local water quality and reduce flood risk.	Water	9
14.	<b>Pressure on Water Resources</b> The level of development required by the East of England Plan, and the population growth that this is likely to cause, will dramatically increase the pressure on existing water resources. These resources are already strained given that the amount of rainfall received in the East of England is significantly less than for other parts of the UK, and is likely to decrease as a result of projected climate change.	Opportunity for the Core Strategy to promote, as an integral part of new developments, the inclusion of measures which reduce the demand for water. Such schemes include water conservation measures, such as grey water recycling and water storage mechanisms, and should be considered where there is unlikely to be any material conflict with residential amenity, human health or the wider protection of the environment.  The Core Strategy should promote achieving Code for Sustainable Homes level 3 at minimum for residential dwelling or BREEAM ('Very Good'/'Excellent' standard) for non-residential development. This will help ensure that water efficiency measures form part of the development design.	Water, Population	11, 15
15.	<b>Comparatively High Levels of Waste Arisings</b>			



	The amount of household waste collected per head in St Edmundsbury has reduced since 2004/05 but is higher than the national mean. The volume of municipal waste produced has reduced by a significant amount since 2002/03	Opportunity for the Core Strategy to promote the use of sustainable construction techniques, using recycled materials where possible. This will reduce the waste generated by redevelopment which contribute both to the cost of the build and also to the degradation of the local environment.	Material Assets	12
16.	<b>Potential for Flood Risk</b> Whilst a very low proportion of property in St Edmundsbury is at risk of flooding, Bury St Edmunds, Haverhill and many of the borough's villages are located in river valleys. Historic evidence has demonstrated that extreme weather conditions have the potential to cause damage through flooding.	Opportunity for the Core Strategy to reduce the susceptibility of developments within the borough to flooding through the location of proposed new development on land outside of Flood Zones 2 and 3. Where development is likely to result in increased surface water run-off and flooding, the Core Strategy should require that suitable flood mitigation or alleviation measures, including SUDS, be implemented in order to overcome the flood risk.	Climatic Factors, Water	15
17.	<b>Need to Adapt to a Changing Climate</b> The main expected climate changes in the East of England are likely to include: <ul style="list-style-type: none"> <li>Increases in temperatures (hotter summers, milder winters);</li> <li>Increases in seasonality (e.g. dryer summers, wetter winters);</li> <li>Increases in the intensity and frequency of storm events (e.g. extreme rainfall event leading to fluvial/groundwater flooding).</li> </ul>	Opportunity for the Core Strategy to ensure that communities, developments and infrastructure (e.g. the road and rail networks) within the borough are adapted to cope with forecasted changes in climate.	Climatic Factors	15
18.	<b>High Energy Consumption</b> Average annual electricity consumption figures for St Edmundsbury show a decrease in domestic electricity consumption and an increase in industrial energy consumption since 2003. Figures also	Opportunity for the Core Strategy to encourage the location of renewable energy facilities within the borough, particularly through the inclusion of micro-renewable energy generation on site as an integral part	Material Assets	9, 14

	<p>indicate that average domestic and industrial energy consumption in the borough is above both that for the East of England and GB.</p> <p>Domestic gas consumption is below figures for East of England and GB. However, industrial gas consumption is relatively high.</p> <p>There are no commercial renewable energy facilities within the borough.</p>	<p>of large developments.</p> <p>The Core Strategy should promote achieving Code for Sustainable Homes level 3 at minimum for residential dwelling or BREEAM ('Very Good'/'Excellent' standard) for non-residential development. This will help ensure that energy efficiency measures form part of the development design.</p>		
19.	<p><b>High CO<sub>2</sub> Emissions per Capita</b></p> <p>Per capita domestic CO<sub>2</sub> emissions in St Edmundsbury (2.43 tonnes) are slightly lower than regional (2.48 tonnes) and national figures (2.54 tonnes). However, total CO<sub>2</sub> emissions per capita in 2006 (13.44 tonnes) increased from 2005 level (12.10 tonnes) and are higher than regional and national figures, as a result of the industrial nature of the borough. Recent increases in total emissions in St Edmundsbury are likely to be as a result of industrial growth in Haverhill.</p>	<p>Opportunity for the Core Strategy to promote cleaner manufacturing industries and other employment sectors as an alternative to existing industry within the borough.</p> <p>Opportunity to promote renewable, low carbon energy technologies and energy efficiency measures within the borough. Promotion of achieving Code for Sustainable Homes level 3 at minimum for residential dwelling or BREEAM ('Very Good'/'Excellent' standard) for non-residential development will help minimise CO<sub>2</sub> emissions from new development.</p> <p>Further opportunity for the Core Strategy to assist with the reduction in CO<sub>2</sub> emissions through the provision of low carbon sustainable transport networks as an alternative to the private car. Specifically the Core Strategy should promote an increase in public transport infrastructure and services as an integral part of new large-scale development to ensure that there is a realistic alternative to the private car. The location of new development with respect to existing and proposed sustainable transport networks can assist with the reduction of CO<sub>2</sub> emissions.</p>	Climatic Factors	14
20.	<p><b>Need to Preserve Valuable Land and Soil</b></p>			

	The majority of farmland in the borough is either Grade 2 or 3 which are generally considered to be the best and most versatile types of agricultural land. The high level of growth in St Edmundsbury required by the East of England Plan is likely to result in the loss of some of this valuable land.	Opportunity for the Core Strategy to reduce the loss of valuable agricultural land through the promotion of brownfield sites and those located on poor quality land as preferable sites to those located on Grade 2 and 3a agricultural land and through the promotion of higher density developments.	Soil, Landscape	10
21.	<b>Presence of Contaminated Land</b> Despite recent remediation, there exist a large number of potentially contaminated sites within St Edmundsbury. Contamination of land is an important issue in the use of previously developed land. Removing contamination through the development process helps reduce the take-up of greenfield sites and also diminishes the threats posed by contamination to health, safety and the environment.	Opportunity for the Core Strategy to reduce the area of potentially contaminated land within the borough through the promotion of brownfield sites for development. If contaminated, these sites will require remediation prior to development, thereby reducing threats posed by contamination to health and the environment.	Landscape, Soil, Material Assets	10
22.	<b>Low Completions on Previously Developed Land</b> Whilst St Edmundsbury regularly meets its target of 40% of completions on PDL, this target is significantly lower than that for the East of England as a whole. The proportion of completions on PDL is likely to decrease in the future if St Edmundsbury is to achieve the high level of growth required by the East of England Plan.	Opportunity for the Core Strategy to maintain the proportion of completions located on PDL through the promotion of brownfield sites for development. However, it is understood that the level of development that is required for the borough means that a significant proportion of the development will need to be located on greenfield land.	Landscape, Soil, Material Assets	18
23.	<b>High traffic volume and reliance on private car</b> Traffic volumes within St Edmundsbury are high, with the proportion of journeys to work in the borough being undertaken by car being significantly higher in 2001 than that for the East of England and England. The proportion of journeys to work undertaken by public transport in the borough is significantly lower than that for the East of England and England.	Opportunity for the Core Strategy to reduce existing high traffic volumes and reliance on private car through the creation of a sustainable integrated transport network which services Bury St Edmunds, Haverhill and the smaller market towns within the borough.  Further opportunity for the Core Strategy to reduce the number of miles travelled in the personal car through the location of new development in close proximity to	Air, Human Health	9, 21

	Available data suggests that the distance that residents of St Edmundsbury commute to work is significantly higher than the national mean.	existing services, amenities and facilities. Any transport networks or services required by the new developments should be fully integrated with the existing transport network.  Opportunity for the Core Strategy to enhance the attractiveness of the borough for investment and new business and employment opportunities in order to reduce the need for residents to commute to outside the borough for work.		
<b>ECONOMIC ISSUES</b>				
24.	<b>Changing Employment Sectors</b> The proportion of St Edmundsbury's population employed in agriculture and manufacturing is declining. There are major differences in prominent employment sectors within the borough. Haverhill is industrial in nature with more than three times the proportion of manufacturing employment compared to Bury which is dominated by public sector employment, accounting for almost one third of total employment.	Opportunity for the Core Strategy to ensure that the borough is attractive for businesses which require workers who have similar skills to those required in agriculture and manufacturing and that the problems associated with the decline in agriculture and manufacturing are minimised, particularly in Haverhill. As part of this, the Core Strategy should enlarge the employment base of the borough, in order to safeguard its economy and the financial security of its residents from fluctuations in the job market.	Material Assets	19, 22
25.	<b>Fluctuating Business Formation Rates</b> The business formation rate in St Edmundsbury fluctuates but is broadly similar to that of East of England. The business formation rate in 2006 and 2007 was lower than that observed between 2001 and 2004.	Opportunity for the Core Strategy to ensure that the borough is attractive for investment and new businesses through the provision of high quality business developments of appropriate size and type to suit the employment needs of the borough.	Material Assets	19

## 6. Sustainability Appraisal Framework

### Introduction

- 6.1 The SA Framework is a key component in completing the SA through synthesising the baseline information and sustainability issues into a systematic and easily understood tool that allows the assessment of effects arising from the implementation of the Core Strategy in key areas. Although the SEA Directive does not specifically require the use of objectives or indicators in the SEA process, they are a recognised and useful way in which social, environmental and economic effects can be evaluated and compared at key stages of the Strategy's development.
- 6.2 The SA Framework comprises a list of **objectives**. Progress toward achieving these objectives will be measured using the corresponding **indicators**. The purpose of the SA Framework is to provide a set of criteria against which the performance of the Core Strategy can be predicted and evaluated.

### St Edmundsbury Core Strategy SA Framework

- 6.3 An SA Framework has been developed using an iterative process, based on the review of relevant plans and programmes, the evolving baseline, analysis of key sustainability issues and consideration of which of these issues can potentially be addressed by the Core Strategy. It also has been based on the SEA Framework prepared by the Suffolk Sustainability Appraisal Group for all Suffolk authorities to use and adapt in their SA work. The SA Framework is presented in Table 6.1.
- 6.4 It is considered that the 22 objectives listed in Table 6.1 adequately address the matters required to be considered in the SA. Amendments have been made to the overall framework since the publication of the Core Strategy Preferred Options and Strategic Sites Issues and Options SAR in November 2008. These reflect the comments received from consultees and have been finalised following internal Council discussion relating to the key priorities for St Edmundsbury.
- 6.5 The SA Framework developed for the St Edmundsbury Core Strategy includes a series of carefully selected indicators which provide a clarification of the intended interpretation of each objective.

Table 6.1 – SA Framework

No	Objective	Detailed decision making criteria	Indicator
<b>Social Objectives</b>			
1.	To improve the health of the population overall and reduce health inequalities	Will it improve access to high quality, health facilities?	Proportion of population with access to hospital or GP or dentist surgery
		Will it reduce health inequalities and death rates?	% of people who describe their health as not good
			% of people who describe their health as good
			Overall death rate by all causes per 100,000 population
			Cancer (Malignant neoplasm's) deaths under 75 per 100,000 population
			Heart disease deaths under 75 per 100,000 population
			Respiratory disease deaths (all ages) per 100,000 population
			Deaths from self harm and injury undetermined per 100,000 population
			Number of people killed and seriously injured (KSI) in road traffic accidents (RTA) per 100,000 population
			Life expectancy (years)
		Will it encourage healthy lifestyles?	Proportion of journeys to work on foot or by cycle
			How do children travel to school?
			Obesity in the population
			Change in existing provision of outdoor playing space (youth and adult space)
			Change in existing provision of children's play space
			Change in provision of open space
			% of footpaths and other rights of way which are easy to use by members of the public

			Change in amount of accessible natural green space (Districts)
			Participation in sport and active recreation (National Indicator 8)
2.	To maintain and improve levels of education and skills in the population overall	Will it improve qualifications and skills of young people?	% of year 11 pupils gaining 5+ A*-C grades at GCSE
			Average point score per student at A and AS level
		Will it improve qualifications and skills of adults?	Proportion of the population with no qualifications
			Working age population with NVQ level 4 or higher
3.	To reduce crime and anti-social activity	Will it reduce actual levels of crime?	Crime rate per 1000 population
			Burglary Rate per 1000 population
			Violent Crime Rate per 1000 population
		Will it reduce the fear of crime?	Fear of Crime
		Will it reduce noise and odour concerns?	Number of domestic and commercial noise complaints
			Number of odour complaints
4.	To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	Proportion of the population who live in wards that rank within the most deprived 10% and 25% of wards in the country
			Number of housing benefit recipients in St Edmundsbury borough
5.	To improve access to key services for all sectors of the population	Will it improve accessibility to key local services?	Percentage of rural population living in parishes which have a food shop or general store, post office, pub, primary school and meeting place
			Percentage of rural households within 15 minutes' walk of an hourly bus service
			Proportion of population with access to key local services e.g. GP, post office
		Will it improve accessibility to shopping facilities?	New Retail Floor Space in Town Centres
			Proportion of population with access to a food shop
		Will it improve access to	Number of child care places per thousand children under 5



		childcare?	
6.	To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce unemployment overall?	Unemployment rate – (%) unemployed persons
		Will it reduce long-term unemployment?	Long-term unemployment
		Will it provide job opportunities for those most in need of employment?	Proportion of lone parents and long term-ill who are economically active
		Will it help to improve earnings?	Average Earnings
7.	To meet the housing requirements of the whole community	Will it reduce homelessness?	Homelessness Numbers
		Will it provide enough housing?	Housing Stock
			Housing Land Availability
		Will it increase the range and affordability of housing for all social groups?	Affordable Housing completions
			Special Needs Housing
			Number of homes managed by Registered Social Landlords
			Dwellings per hectare of Net Developable Area
			Average property price and Housing Affordability
			Percentage of vulnerable persons living in non-decent homes
8.	To improve the quality of where people live and to encourage community participation	Will it improve the satisfaction of people with their neighbourhood as a place to live?	% of residents who are happy with their neighbourhood as a place to live
		Will it increase access to natural green space?	Area of land managed in whole or part for its ecological interest and with public access over and above public rights of way
			Areas of deficiency in terms of natural green space
			Change in amount of accessible natural green space

		Will it encourage engagement in decision making?	Electoral turnout in local authority elections
			Number of Parish Plans completed
		Will it increase the number of people involved in volunteer activities?	Number of people involved in volunteer activities
		Will it improve ethnic relations?	Number / rate of racist incidents
		Will it improve access to cultural facilities?	Number of visits to/uses of Council funded or part-funded museums per 1,000 population
			Number of visits to Council funded or part-funded museums that were in person per 1,000 population
			The number of pupils visiting museums and galleries in organised school trips
			Percentage of adults who have either attended an arts event or participated in an arts activity at least three times in the past 12 months (NI 11 Engagement in the arts)

No	Objective	Detailed decision making criteria	Indicator (source)
<b>Environmental Objectives</b>			
9.	To improve water and air quality	Will it improve the quality of inland waters?	Water quality in rivers
			Groundwater quality
		Will it improve air quality?	Have annual mean concentrations of any key air pollutants been exceeded?
			Number of Air Quality Management Areas and dwellings affected
10.	To conserve soil resources and quality	Will it minimise the loss of greenfield land to development?	Number and percentage of new dwellings completed on greenfield land
			Dwellings per hectare of net developable area
		Will it minimise loss of the best and most versatile agricultural	Allocations on best and most versatile agricultural land (grades 1, 2, and 3a)

		land to development?	
		Will it maintain and enhance soil quality?	Number of potential and declared contaminated sites returned to beneficial use
			Number / area of organic farms (ha)
11.	To use water and mineral resources efficiently, and re-use and recycle where possible	Will it promote sustainable use of minerals?	Recycled aggregate production
		Will it promote sustainable use of water?	Daily domestic water use (per capita consumption, litres) for St Edmundsbury
		Will it maintain water availability for water dependant habitats?	Water availability for water dependent habitats
12.	To reduce waste	Will it reduce household waste?	Household and municipal waste produced
		Will it increase waste recovery and recycling?	Tonnage / proportion of household (and municipal) waste recycled, composted and landfilled
13.	To reduce the effects of traffic on the environment	Will it effect traffic volumes?	Traffic volumes in key locations
		Will it reduce the need for local travel?	Percentage of all new residential development taking place in major towns, other towns, and elsewhere
			Percentage of rural population living in parishes which have a food shop or general store, post office, pub, primary school and meeting place
			Distance to key services
		Will it increase the proportion of journeys made using modes other than the private car?	Percentage of journeys to work undertaken by sustainable modes
			Percentage of schoolchildren travelling to school by sustainable modes
			Car parking standards (the number of spaces per development)
14.	To reduce contributions to climate change	Will it reduce emissions of green house gases by reducing energy consumption?	Consumption of electricity - Domestic use per consumer and total commercial and industrial use
			Consumption of gas - Domestic use per consumer and total commercial /industrial use

			Energy efficiency Local Authority Housing stock
			GHG emissions by sector and per capita emissions - proportion and absolute quantity in tonnes per year (Defra Statistics on CO <sub>2</sub> emissions for local authority areas)
			Percentage of buildings achieving desired rating against national building standards such as Code for Sustainable Homes (all new dwellings meeting Code level 3 by 2010, Code level 4 by 2013 and Code level 6 by 2016) or BREEAM ('Very Good'/'Excellent' standard).
			Percentage of new development which sources a percentage of energy from low carbon or renewable sources: i. Onsite; ii. Offsite.
			Number of properties receiving grants to increase energy efficiency in their homes (e.g. from Carbon Emissions Reductions Target Scheme or the Warm Front Scheme)
15.	To reduce vulnerability to climatic events	Will it increase the proportion of energy needs being met by renewable sources?	Renewable energy generation: installed generating capacity.
		Will it minimise the risk of flooding to people and property from rivers and watercourses?	Flood Risk – Planning applications approved against Environment Agency advice
			Properties at risk of flooding from rivers
			Incidence of fluvial flooding (properties affected)
		Will it reduce the risk of damage to people and property from storm events?	Incidence of flood watches and warnings
16.	To conserve and enhance biodiversity and geodiversity	Will it maintain and enhance sites designated for their nature conservation interest statutory: SSSIs, SPA, SAC, LNRs and non-statutory: County Wildlife Sites (CWS)?	Change in number and area of designated ecological sites
			Condition of CWS (new National Indicator 197)
		Will it avoid disturbance or	Reported condition of ecological SSSIs

		damage to protected species and their habitats?	Development proposals affecting protected species outside protected areas
		Will it help deliver targets and action for habitats and species within the Suffolk Biodiversity Action Plan (BAP)?	Achievement of Habitat Action Plan targets
			Achievement of Species Action Plan targets
			Development proposals affecting BAP habitats outside protected areas
		Will it help to reverse the national decline in farmland birds?	Bird survey results
		Will it protect and enhance sites, features and areas of geological value in both urban and rural areas?	Change in number and area of designated geological SSSIs and Regionally Important Geological/Geomorphological Sites (RIGSs)
			Reported condition of geological SSSIs and RIGSs
17.	To conserve and where appropriate enhance areas of historical and archaeological importance	Will it protect and enhance sites, features and areas of historical and cultural value in both urban and rural areas?	Number of listed buildings and buildings at risk
			Area of historic parks and gardens
			Number and area of Conservation Areas (CAs) and Article 4 directions
			Number of Conservation Area Appraisals (CAAs) completed and enhancement schemes (in conservation areas) implemented
		Will it protect and enhance sites, features and areas of archaeological value in both urban and rural areas?	Number of Scheduled Ancient Monuments (SAMs) damaged as a result of development
			Number of applications affecting known or unknown archaeological site but judged of high potential and approved with conditions requiring prior excavation or recording during development
18.	To conserve and	Will it reduce the amount of	Number and percentage of new dwellings completed on previously developed land

	enhance the quality and local distinctiveness of landscapes and townscapes	derelict, degraded and underused land?	Number and percentage of existing housing commitments on previously developed land
			Number of vacant dwellings
		Will it improve the landscape and/or townscape?	Landscape condition specified in landscape character assessments
			Number / area of town / village greens and commons
			Area of Designated Landscape, Historic Parks and Gardens
			Number of Countryside Stewardship / Environmental Stewardship schemes
			Light pollution
			Number of planning applications refused for reasons due to poor design

No	Objective	Detailed decision making criteria	Indicator (source)
<b>Economic Objectives</b>			
19.	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Will it improve business development and enhance competitiveness?	Take-up of URBAN employment floorspace (completions)
			Take-up of RURAL employment floorspace (completions)
			Employment permissions and allocations (URBAN)
			Employment permissions and allocations (RURAL)
			Net change in the total number of VAT registered businesses in the area
			Business formation rate (or new VAT registrations as % of total VAT registered stock)
		Will it improve the resilience of business and the economy?	Business start ups and closures
			Employment by industry %
			Number and percentage of businesses by main industry type
			Number and percentage of businesses by size (number of employees)

		Will it promote growth in key sectors?	Number and percentage of businesses by industry type in key sectors
		Will it improve economic performance in advantaged and disadvantaged areas?	Comparative industrial and office rental costs within the plan area (to complete based on identified advantaged and disadvantaged areas in own area)
		Will it encourage rural diversification?	Employment permissions and allocations in rural areas (RURAL)
20.	To revitalise town centres	Will it increase the range of employment opportunities, shops and services available in town centres?	Percentage of town centre units with A1 uses
		Will it decrease the number of vacant units in town centres?	% Vacant units in town centres
21.	To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	Distances travelled to work for the resident population
			Import/export of workers to district and/or major towns
			Employment permissions and allocations in urban areas (URBAN)
			Number / percentage of people working from home as main place of work
		Will it improve accessibility to work by public transport, walking and cycling?	Number of developments where a travel plan is submitted or is a condition of development
			Percentage of journeys to work undertaken by sustainable modes
		Will it increase the proportion of freight transported by rail or other sustainable modes?	Proportion of port freight carried by rail
		Will it increase the consumption of locally produced food and goods?	Number of farmers markets and farm shops
			Number of locally sourced products stocked by major supermarket chains
22.	To encourage and accommodate both	Will it encourage indigenous business?	Number of enquiries to business advice services from within area



	indigenous and inward investment	Will it encourage inward investment?	Number of enquiries to business advice services from outside of area
		Will it make land available for business development?	Employment land availability (URBAN)
			Employment land availability (RURAL)
			Employment permissions and allocations (URBAN)
			Employment permissions and allocations (RURAL)

## SA Baseline Data and Trends

- 6.6 The SA Framework is the key tool used in the assessment of effects. The prediction of effects, in terms of their magnitude, frequency, duration, and spatial extent, is conducted via detailed analysis of the baseline data. It is thus important to ensure that critical aspects of the baseline can be directly related to the objectives and indicators of the SA framework. Determining the significance of predicted effects is perhaps the most critical task in the SA. The picture that the baseline presents in terms of the SA framework is the starting point for this.
- 6.7 Table 6.2 presents a summary of the current trends observed in the baseline data (improving, stable or declining) against the updated SA objectives.

### Future Baseline

- 6.8 The SEA Directive requires the consideration of the likely evolution of the state of the environment without the implementation of the plan being assessed. Within the next 20 years it is predicted that there will be a number of external influences that will affect the state of St Edmundsbury's social, natural, built and economic environment, without the implementation of the St Edmundsbury Core Strategy.
- 6.9 Such influences and future trends are also set out in Table 6.2. These baseline trends without the implementation of the Core Strategy have been used in the assessment of the Core Strategy policies and strategic sites set out in Sections 9 and 10 below.

Table 6.2 – SA Current and Predicted Future Baseline Data Trends

SA Objectives		Current Condition	Future Trends	Comments
<b>Social</b>				
1	To improve the health of the population overall and reduce health inequalities	Good	Stable	Accessibility to GP and Hospitals in St Edmundsbury improved between 2004 and 2005. Current good levels of self-assessed health averages, similar to that of the East England and better than that of England as a whole, are likely to remain stable in the future with or without the implementation of the plan, as the Replacement Local Plan will safeguard potential sites for health and emergency facilities.
2	To maintain and improve levels of education and skills in the population overall	Good	Improving	The average percentage of year 11 students attaining 5 A*-C grades at GCSE for St Edmundsbury was above both the regional and national averages in 2007 at 70.7%. The proportion of students gaining 5 A*-C grades at GCSE in the borough is growing year on year, at approximately the same rate as England.
3	To reduce crime and anti-social activity	Good	Stable	There has been a significant reduction in crime figures between 2005 and 2008 and crime rates in St. Edmundsbury are lower than those for East of England and England. The situation is likely to remain stable in the future with or without implementation of the plan.
4	To reduce poverty and social exclusion	Good	Declining	The overall rank of 2007 Indices of Multiple Deprivation of St Edmundsbury is good. However, the borough's score and ranking declined between 2004 and 2007, indicating that the borough became more deprived in comparison with the rest of the nation during this period.
5	To improve access to key services for all sectors of the population	Moderate	Improving	Many parishes in the rural areas of St Edmundsbury lack essential services. Nonetheless, 59% had a public house and 69% had a village or community centre. However, accessibility in St Edmundsbury is improving, with increases in the percentage of rural households within 13 minutes' walk of an hourly bus service (36% in 2005/06 compared with 23% in 2001/02) and the proportion of the population with access to hospital or GP or dentist surgery. Accessibility to key services and facilities is likely to further improve in line with the current trends, as the Local Plan Strategy is committed to reduce the need to travel, by improving the balance between homes and key services.

SA Objectives		Current Condition	Future Trends	Comments
6	To offer everybody the opportunity for rewarding and satisfying employment	Moderate	Stable	In 2008, St Edmundsbury was the local authority with the highest employment rate in Great Britain outside London. There is an upward trend for pay in the borough. However, rates are still below that for the East of England and England with a high rate of low paid jobs in the borough. The likely trend without implementation of the Core Strategy will be for current employment characteristics to remain stable.
7	To meet the housing requirements of the whole community	Moderate	Improving	The current level of housing completion is below the East of England Plan target. However, there was an increase in the number of housing completions in recent years. Proportion of affordable completions has increased significantly between 2004/05 and 2007/08. The proportion of net completions which were affordable in St Edmundsbury is higher than for the East of England.
8	To improve the quality of where people live and to encourage community participation	Moderate	Stable	St Edmundsbury has a relatively high level of satisfaction for 'residents who are happy with their neighbourhood as a place to live' with the percentage of satisfied residents higher than the county average. In terms of community participation, although the turnout to local authority elections has fallen since the 1990s, there are a number of active community and residents groups operating across the borough. The completion or participation level in the production of Parish Plans is relatively poor compared with other Suffolk authorities.
<b>Environmental</b>				
9	To improve water and air quality	Good	Improving	The quality of water within the borough's rivers is generally fair to good in terms of chemical and biological quality. Air quality is also generally good within St Edmundsbury with no Air Quality Management Areas (AQMAs) having been designated within the borough. The likely trends in water and air quality without implementation of the Core Strategy is likely to be improving as the Replacement Local Plan identifies measures to be undertaken and the need to protect water resources and local air quality.
10	To conserve soil resources and quality	Moderate	Improving	The target of 40% of development to be provided on previously developed land set in the Replacement St Edmundsbury Local Plan has been exceeded in recent years, with 54.4% of dwellings completed in St Edmundsbury in 2007/8 being located on PDL. However, this is below the Government target of 60%. Contamination of land is an important issue in the use of previously developed land. Removing contamination through the development process helps reduce the take-up of greenfield sites and also diminishes the threats posed by contamination to

SA Objectives		Current Condition	Future Trends	Comments
				health, safety and the environment. The number of potentially contaminated sites has been reduced. This trend is likely to continue, as the Local Plan includes a policy (NE4) to ensure improvement in the study area's contaminated sites.
11	To use water and mineral resources efficiently, and re-use and recycle where possible	Good	Declining	The East of England is already the driest region in the UK, therefore water conservation and efficiency are becoming an increasing priority. Domestic water consumption in St Edmundsbury is marginally below national levels. The proportion of household waste recycled in the borough is significantly higher than that for the East of England and England, and is increasing year on year. However, the level of population growth expected in St Edmundsbury is likely to dramatically increase pressure on both water and mineral resources in the future.
12	To reduce waste	Moderate	Declining	The volume of household waste produced has been roughly stable over the period of 1999-2006, whereas the volume of municipal waste produced has reduced by a significant amount since 2002/03. The amount of household waste collected per head in St Edmundsbury has reduced since 2004/05 but is higher than the national mean. Likely population growth within St Edmundsbury is likely to increase the volume of waste produced by the borough.
13	To reduce the effects of traffic on the environment	Poor	Stable	Traffic volumes within the study area are high with the proportion of journeys to work by car significantly higher than that for the East of England and England (2001). The reliance on the private car is likely to remain high in the absence of a realistic alternative.
14	To reduce contributions to climate change	Poor	Declining	Total emissions per capita in 2006 increased from 2005 level and are higher than regional and national figures, as a result of the more industrial nature of the borough. Per capita domestic CO <sub>2</sub> emissions have decreased in St Edmundsbury and are comparable to national but higher than regional figures. Due to the probable continuation of the operation of industry in St Edmundsbury, and the increase in CO <sub>2</sub> emissions which is expected to accompany the future increase in St Edmundsbury's population, the likely future trend will be declining.
15	To reduce vulnerability to climatic events	Good	Stable	A very low proportion of properties in the borough are at risk of flooding and the average flow of the watercourses is low. The likely future trend will remain stable if no planning applications are approved against EA advice.

SA Objectives		Current Condition	Future Trends	Comments
16	To conserve and enhance biodiversity and geodiversity	Moderate	Improving	Large areas of the Borough have ecological designations at national, regional and local levels and there are a large number of designated BAP habitats and species. The majority of the ecological SSSIs in the borough are in partly an unfavourable or mixed condition, with 13 of the 23 SSSIs meeting PSA targets, a further 7 meeting PSA targets in over half of their areas, 1 meeting PSA targets in under half of its area, with a further 2 SSSIs not meeting their PSA target at all. However, all geological SSSIs meet PSA targets. The future trend is likely to improve, as the Local Plan aims to protect and enhance biodiversity and ecological conservation.
17	To conserve and where appropriate enhance areas of historical and archaeological importance	Good	Improving	The number of Listed Buildings, Designated Parks and Gardens and Conservation Areas has gradually increased in the Borough. The number of buildings at risk has fallen since 2003 and the borough has met the Suffolk target of 0.7% and no SMs have been damaged as a result of new development. These features are well protected within the Borough and the Local Plan is committed to protect the local historic environment. Therefore, the future trend is likely to improve.
18	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Moderate	Declining	St Edmundsbury has 16687 ha of Special landscape area (25.5% of Borough) and 14 landscape types. Development pressures (e.g. suburbanisation, transport and industrial developments, agricultural rationalisation and tourism related development) as a result of past and projected future development within the borough have placed, and are likely to continue to place significant pressure on the landscape of St Edmundsbury.
<b>Economic</b>				
19	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Moderate	Improving	The business formation rate in St Edmundsbury fluctuates but is broadly similar to that of East of England. The business formation rate in 2006 and 2007 was lower than that observed between 2001 and 2004. Between 1998 and 2004, the Banking and Finance industry, and the Public Admin, education and health sectors have seen significant levels of growth, with a large decline in the energy and water and manufacturing sectors. The Replacement Local Plan envisages balancing economic growth with protecting the built and natural environment.
20	To revitalise town centres	Good	Improving	The town centre at Bury St Edmunds and increasingly the town centre at Haverhill act as sub-regional centres providing a focus for shopping, leisure, business and cultural activities for the towns themselves and the surrounding smaller settlements,

SA Objectives		Current Condition	Future Trends	Comments
				as well as the needs of residents outside the borough. Policy BSE7 (town centre development area – Bury St Edmunds) and Policy HAV5 (Haverhill town centre Masterplan) in the Replacement Local Plan aim to regenerate and revitalise the town centres. Therefore, the future trend is likely to improve.
21	To encourage efficient patterns of movement in support of economic growth	Moderate	Declining	A large majority of people who live in St Edmundsbury also work in the borough (71%). However, the distance that residents of St Edmundsbury commute to work is significantly higher than the national mean. A high proportion of journeys to work in the borough are undertaken by car. The reliance on the private car is likely to persist due to a predominantly rural nature of the area and the lack of public transport provision.
22	To encourage and accommodate both indigenous and inward investment	Good	Improving	St Edmundsbury was designated as a Growth Area in 2007. This enabled preparation of an area development programme and obtaining funding. It is considered that targeted public investment will stimulate private sector investment in the area. Therefore the future trend is likely to improve.

**Key:**                      **Current Conditions - good/moderate/poor**      **Future Trends – improving/stable/declining**

Good
Mod
Poor

Impr
Stable
Decl



## 7. Compatibility between Core Strategy Objectives and SA Objectives

### Introduction

- 7.1 In order to ascertain the overall sustainability of the approach proposed for the Core Strategy, the draft Core Strategy Objectives, initially identified in the Draft Core Strategy Issues and Options Report, were tested against the SA Objectives to gauge their compatibility.
- 7.2 It should be noted that the Objectives have undergone a number of iterations since the assessment was completed.

### Overview

- 7.3 Table 7.1 shows the results of the broad compatibility assessment of the initial set of the Core Strategy objectives with the SA Objectives. It indicates that in the majority of cases, where there is relevance between the two sets of objectives, they are either broadly compatible, or offer the potential to be compatible dependent upon the implementation measures proposed through the development of the Core Strategy policies.
- 7.4 This is particularly true of the predicted compatibility against the social and economic dimensions of sustainability. In contrast, there is a considerable amount of uncertainty against the environmental objectives resulting in potential conflicts, which requires clarification through the translation of the Core Strategy objectives into policy in order to maximise their potential contribution in sustainability terms.

### Objectives with Potential Conflicts

- 7.5 Core Strategy Objectives A (*Housing requirements*), B (*Economic vitality and wealth*) and I (*Provision of services and communities*) conflict with SA Objectives 12 (*Waste*), 13 (*Traffic effects*), 16 (*Biodiversity and geodiversity*) and 17 (*Historical and archaeological assets*). Provision of adequate levels of housing, facilities and employment opportunities is likely to require an additional take of Greenfield land, leading to potential conflict with the preservation of biodiversity and historic and areas of historical and archaeological importance. New development will also lead to higher levels of waste generation and to a net increase in the usage of the private car. It is for these reasons that the three objectives have been highlighted as potentially in conflict with the listed SA objectives.

### Compatibility Dependent upon Implementation Measures

- 7.6 The compatibility assessment has identified a considerable number of incidences where the compatibility or otherwise of Core Strategy and SA Objectives is assessed as being 'dependent upon implementation measures'. This essentially represents instances where careful attention will need to be paid to the content of the policies developed to implement the Core Strategy Objectives. Key point to note in this respect is as follows:
- The majority of assessments falling into this category are related to the inherent correlation between the construction of new built development and the potential for environmental consequences in terms of increased emissions, including GHG emissions, increased trip generation, potential for pollution, requirements for increased water and resource usage, potential for the permanent loss of land of biodiversity value to development, and potential for an increased risk of flooding.

*Recommendation: in order to ensure that implementation measures result in a positive correlation between the Core Strategy Objectives and the SA Objectives, the wording of policies must reflect the latest thinking on the sustainable siting, design and construction*

*of buildings, including climate change mitigation and adaptation considerations; and strongly support the provision of public transport and other sustainable modes and waste recycling infrastructure.*

- 7.7 The discussion of the results of the compatibility assessment for each draft Core Strategy objective is presented in Table 7.2.

### **Submission Core strategy Objectives**

- 7.8 As a result of the recommendations of the compatibility assessment and consultation comments received on the Draft Core Strategy Issues and Options Report, a number of the Core Strategy objectives were refined and one new objective was added to the Core Strategy objectives. The Submission Draft Core Strategy Objectives are listed below:

- Strategic Objective A - To deliver housing in a sustainable way, including specialist and affordable housing to meet the needs of the whole community, by providing an adequate and continuous supply of land for housing whilst seeking to maximise the amount of Previously Developed Land used.
- Strategic Objective B - To secure economic vitality and growth by delivering an adequate and continuous supply of land for employment to meet the needs and demands of different sectors of the economy and reduce the need for out-commuting.
- Strategic Objective C - To sustain and enhance rural communities by providing, where infrastructure and environmental capacity exists, new housing to grow settlements and safeguard existing rural services while, maintaining and, where possible, improving the rural environment.
- Strategic Objective D - To maintain and develop leisure, cultural, educational and community facilities, including access to green space, commensurate to the level of housing and employment growth to meet the needs of residents and visitors.
- Strategic Objective E - To provide opportunities for people to shop for all their needs by sustainable means in thriving and economically viable town, local and district centres.
- Strategic Objective F - To enable people and goods to move around efficiently and safely to the benefit of the economy and community, with minimum harm to the environment by seeking to reduce car dependency and encouraging more sustainable forms of transport
- Strategic Objective G - To maintain and protect built and natural environment and ensure that new development protects and enhances assets of local design, cultural, historic and conservation importance, and character of the landscape.
- Strategic Objective H - To maintain, protect and enhance the biodiversity, geodiversity and natural environment and seek opportunities to increase the provision of green open space and access to the countryside.
- Strategic Objective I - To ensure that new development only occurs where there is adequate capacity in existing services, facilities and infrastructure or where this capacity can reasonably be provided.
- Strategic Objective J - To ensure new development addresses and tackles environmental and sustainability issues including climate change adaptation, carbon emissions reduction, renewable energy provision, recycling, waste reduction and water efficiency.

### **Final Core Strategy Objectives**

- 7.9 Following the Inspector's report (received August 2010) there has been a change made to Strategic Objective A, which is now worded as follows:
- To meet the communities need for housing in a sustainable way, including specialist and affordable housing, by providing an adequate and continuous supply of land for housing

**Table 7.1 – Compatibility Matrix between Draft Core Strategy Objectives and SA Objectives**

SA Objective		Draft Core Strategy Objectives								
		A	B	C	D	E	F	G	H	I
1.	To improve the health of the population overall and reduce health inequalities	✓	✓	✓	✓	✓	✓	✓	✓	✓
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 improve water and air quality						✓	✓	✓	?
10.	To conserve soil resources and quality							✓	✓	
11.	To use water and mineral resources efficiently, and re-use and recycle where possible						✓	✓	✓	?
12.	To reduce waste	✗							✓	✗
13.	To reduce the effects of traffic on the environment	✗	✗	?		✓	✓		✓	✓
14.	To reduce contributions to climate change	?	?			✓	✓	✓	✓	✓
15.	To reduce vulnerability to climatic events	?	?						✓	
16.	To conserve and enhance biodiversity and geodiversity	✗	✓	✓				✓	✓	✗
17.	To conserve and where appropriate enhance areas of historical and archaeological importance	?			✓					✗
18.	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	?		✓		✓		✓		?
19.	To achieve sustainable levels of prosperity and economic growth throughout the plan area		✓	✓		✓	✓			
20.	To revitalise town centres		✓	?	✓	✓		✓		
21.	To encourage efficient patterns of movement in support of economic growth		✓	✓		✓	✓			✓
22.	To encourage and accommodate both indigenous and inward investment		✓		✓	✓				✓

Key:

✓	Potentially Compatible
✗	Not Compatible
	Not relevant
?	Dependent on Nature of Implementation Measures

**Table 7.2 – Discussion of Results of Assessment of draft Core Strategy Objectives with the SA objectives**

Draft Core Strategy Objective		Commentary
A	To meet the requirements for housing in such a way that is sustainable and will best serve the whole community	New housing should meet the requirements of the whole community and improve the quality of life in the borough. New housing should make a positive contribution to reducing crime and anti-social behaviour and make steps to overcome poverty and social-exclusion. New housing will contribute to renewable energy provision and should be in locations which reduce the need to travel. New residential development could place a strain on the existing infrastructure which could intensify traffic congestion and have a negative impact on health and education provision. This could be mitigated by ensuring that new residential development is accompanied by improvements in infrastructure. New residential development will generate waste; this could be mitigated through the provision of recycling facilities. The provision of adequate levels of housing is compatible with aims to improve population health but has the potential to conflict with the preservation of biodiversity through the loss of greenfield land and archaeology through potential loss of or damage to sites of value.
B	To secure economic vitality and wealth creation in all communities without causing unacceptable harm to the environment	Economic vitality and wealth will provide employment opportunities, revitalise town centres, encourage investment and support sustainable patterns of growth. New development may place a strain on infrastructure, but this could be mitigated through the delivery of new infrastructure. New development may also increase traffic congestion, this could be mitigated through travel plans for new development and enhanced public transport infrastructure. This objective ensures that measures are taken to reduce impact of development on the natural environment including the use of brownfield sites and ecological assessments. Securing economic viability will promote population health and contribute to reducing crime and anti-social activity, reducing poverty.
C	To sustain and enhance rural communities while maintaining and where possible improving the rural environment	This should help to improve access to services in rural areas and enhance the provision of housing and employment opportunities, thereby contributing to reducing poverty and social exclusion. Focusing any new development in existing villages will help develop and support sustainable transport and therefore reduce contributions to climate change. New development within villages could impact upon their character and the character of the surrounding countryside, however Objective C seeks to reduce the negative effect on the rural environment and any effects could be mitigated through good design.
D	To maintain and develop leisure, culture, educational and community facilities to meet the needs of residents and visitors	Improving the health and education of the population will reduce crime and help to reduce poverty and social exclusion in the borough. Access to services will contribute to the overall quality of life, revitalise town centres and encourage investment in the borough. This objective is also likely to conserve and enhance historical and archaeological assets. New development may also increase traffic congestion, this could be mitigated through travel

Draft Core Strategy Objective		Commentary
		plans for new development and enhanced public transport infrastructure. Measures should be taken to reduce impact of development on the natural environment including the use of brownfield sites and ecological assessments.
E	To provide opportunities for people to shop for all their needs by sustainable means in town, local and district centres, which are thriving and viable locations	The improvement of access to shops by sustainable transport means will reduce the effects of traffic on the environment therefore reducing contributions to climate change and reducing negative effects on population health. Increasing use of public transport will also help to alleviate traffic congestion. The overall quality of life will be improved with increased access helping to overcome social exclusion and encouraging a sense of community. The revitalisation of town centres and growth of rural centres will attract further investment into the borough and support sustainable economic growth. New development within villages could impact upon their character and the character of the surrounding countryside, but this could be mitigated through good design.
F	To enable people and goods to move around efficiently and safely to the benefit of the economy and community, with minimum harm to the environment by seeking to reduce car dependency and encouraging more sustainable forms of transport where appropriate and providing greater accessibility to services for all.	Improving transport links across the borough will reduce the effects of traffic on the environment and on contributing to climate change and air quality issues, reduce traffic congestion and improve access to services. This in turn will reduce levels of crime and social exclusion and contribute to improving population health. Improved transport and accessibility will also help to promote sustainable economic growth.
G	To maintain and improve the quality of the built environment	Improvements to the quality of the built environment will contribute to the overall quality of life and promote the revitalisation of town centres. Good design may help to reduce crime and anti-social activity and promote population health. New development should also seek to improve existing environmental conditions and conserve and enhance areas of historical and archaeological importance. Improved quality of the built environment may also include the regeneration of brownfield sites whilst conserving and enhancing the quality and local distinctiveness of landscapes and townscape.
H	To achieve a balanced natural environment where the use of resources and energy is minimised, materials and waste recycled and development undertaken with minimum adverse impact, giving close regard to the principles of sustainability	This will enhance quality of life, reduce contributions to climate change and promote sustainable travel modes. It should also contribute to improving water, soil and air quality within the borough and promote good population health. Consideration should be given to protection and enhancement of local landscape and townscape, retaining local distinctiveness and enhancing biodiversity and geodiversity of the borough.

Draft Core Strategy Objective		Commentary
I	To ensure that existing and new development is adequately served by community facilities and public services which are accessible by sustainable forms of transport	This will contribute to improving the quality of life in the borough and promote a sense of community therefore reducing crime and social exclusion. Provision of services will help to integrate new development with surrounding areas. Provision of community facilities and public services may encourage investment into the borough. Improved accessibility including for non-car users will reduce traffic congestion and reduce contributions to climate change. New development will increase waste production and is likely to conflict with the preservation of biodiversity through the loss of greenfield land and archaeology through potential loss of or damage to sites of value.

## 8. Plan Issues and Options

### Introduction

- 8.1 Stage B of the SA/SEA process seeks to develop and refine options for the Core Strategy. These options included Spatial Strategic Options and Strategic Sites for the Core Strategy DPD.
- 8.2 The SEA Directive requires that the Environmental Report should consider *'reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme'* and give *'an outline of the reasons for selecting the alternatives dealt with'* (Article 5.1 and Annex 1h).

### Development of Spatial Strategic Options

- 8.3 Five main strategic options for the spatial strategy for the borough were set out in Part 5 of the Core Strategy Issues and Options document published in March 2008. These were:
- Option 1: Business as usual – this maintains the hierarchy in the Replacement St Edmundsbury Borough Local Plan 2016 (adopted in 2006), to determine the scale of new development appropriate for each location.
  - Option 2: Urban Growth – under this option new development would be directed towards Bury St Edmunds and Haverhill and a slowing down in the recent rates of development in the rural settlements.
  - Option 3: Regeneration of Haverhill – the majority of new development would be split equally between Bury St Edmunds and Haverhill, and development in the rural areas would be much lower than recently experienced.
  - Option 4: Rural Development - under this option significantly more development would take place in the settlements outside Bury St Edmunds and Haverhill than at present. Development rates in Haverhill would reduce compared with what has actually happened in the last ten years, but growth rates in Bury St Edmunds would continue at the rate achieved over the same period in order to reflect the strategy of the Draft East of England Plan.
  - Option 5: New Settlement – this option proposes a new settlement of at least 3,000 homes plus a commensurate level of jobs, services and community facilities to be constructed in the latter years of the LDF period. Some growth in the existing towns and villages would be required in the interim period to ensure that housing and the economy remain buoyant, but there would be a lower rate of development in those settlements in parallel with the construction of a new settlement.
- 8.4 Each option was assessed against the twenty-two Sustainability Appraisal objectives in terms of its effects, and these assessments formed part of the 26 Draft Core Strategy issues and Options Report - Initial Sustainability Appraisal (March 2008).
- 8.5 This section represents a revised assessment of the strategic spatial options. The revision was undertaken to align the assessment scale with SA best practice to allow for better comparison between all the options. Potential sustainability effects for each of the options were assessed in terms of progress towards achieving the relevant SA objective using the scoring system presented in Table 8.1



**Table 8.1 – Scoring of Options Assessment**

3	+++	Major positive - likely to result in substantial progress towards the objective
2	++	Moderate positive - likely to result in some progress towards the objective
1	+	Minor positive - likely to result in very limited progress towards the objective
0	0	Neutral outcome
-0.5	+/-	Range of possible positive and negative outcomes
0	?	Uncertain outcome
-1	-	Minor negative - likely to be to the very limited detriment of achieving the objective
-2	--	Moderate negative - likely to be to the limited detriment of achieving the objective
-3	---	Major negative - likely to be substantially detrimental to achieving the objective

## Results of Assessment

- 8.6 Table 8.2 presents a summary in numerical form of the results of the assessment of strategic options, while the sections below present a brief analysis of the results. The full assessment tables are presented in Appendix B.
- 8.7 The assessment results show that Options 2 and 3 perform well in the sustainability terms with no significant differences between them, as both options direct further growth to Bury St Edmunds and Haverhill and slow down and restrict development in the rural areas. Option 3 is expected to deliver a higher level of benefits against SA Objective 4 (*Social exclusion*), as it places a higher emphasis on the regeneration of Haverhill, and therefore, overall it performs slightly higher than Option 2. The main benefits that these two options are expected to deliver include better opportunities for development on previously developed land, the provision of good cycle and pedestrian links to employment, services and facilities, the provision of education and skills training, the efficient use of energy, etc.
- 8.8 Option 1 is a business as usual scenario, which supports a more disperse growth by directing development to Bury St Edmunds and also allowing development in the rural service centres. This option is also expected to deliver positive effects against the SA objectives overall, although of lower level than Options 2 and 3.
- 8.9 Option 5 supporting the development of new settlement was also identified as being likely to deliver beneficial effects overall. The main advantages associated with this option include similar effects to Options 2 and 3 in terms of the use of more sustainable modes of transport, accessibility to key services and ability to provide homes for all, and also by providing opportunities to adopt sustainable development measures throughout the development and from the outset. However, disadvantages of this option are loss of significant amount of greenfield land and potentially diverting from opportunities in the existing settlements.
- 8.10 Option 4, promoting growth in the countryside scores the lowest against the SA objectives due to such effects as restricting access to the key services and facilities with little or no scope for employment, exacerbating the reliance on the private car, loss of green space and natural habitats and inability accommodate the required level of growth and meet the housing needs of the whole community. Positive effects of helping avoid the demise of rural facilities are likely to be outweighed by the listed negative effects.
- 8.11 The results of this assessment suggest that the most appropriate way forward would be to amalgamate elements of Options 2 and 3, concentrating on Bury St Edmunds and Haverhill, and also include elements of Option 1, which indicates that certain level of development is required in the rural service centres to maintain the livelihood of the rural areas, in carrying the option through to the preferred option.



**Table 8.2 – Summary of Assessment of Strategic Options for Spatial Strategy**

<b>SA Objective</b>	<b>Option 1</b>	<b>Option 2</b>	<b>Option 3</b>	<b>Option 4</b>	<b>Option 5</b>
1 To improve the health of the population overall and reduce health inequalities	1	2	2	-0.5	2
2 To maintain and improve levels of education and skills in the population overall	1	2	2	1	3
3 To reduce crime and anti-social activity	0	0	0	0	0
4 To reduce poverty and social exclusion	0	0	2	0	0
5 To improve access to key services for all sectors of the population	1	2	2	-0.5	2
6 To offer everybody the opportunity for rewarding and satisfying employment	1	2	2	-1	-0.5
7 To meet the housing requirements of the whole community	1	2	2	-2	3
8 To improve the quality of where people live and to encourage community participation	1	2	2	-0.5	-0.5
9 To improve water and air quality	-1	-2	-2	-2	-1
10 To conserve soil resources and quality	1	2	2	-1	-2
11 To use water and mineral resources efficiently, and re-use and recycle where possible	1	3	3	-2	2
12 To reduce waste	1	2	2	-2	2
13 To reduce the effects of traffic on the environment	1	2	2	-2	2
14 To reduce contributions to climate change	-2	-1	-1	-3	-1
15 To reduce vulnerability to climatic events	-1	-2	-2	-1	-2
16 To conserve and enhance biodiversity and geodiversity	1	2	2	-1	-2
17 To conserve and where appropriate enhance areas of historical and archaeological importance	-0.5	2	2	-1	-2
18 To conserve and enhance the quality and local distinctiveness of landscapes and townscape	1	2	2	-0.5	-0.5
19 To achieve sustainable levels of prosperity and economic growth throughout the plan area	3	2	2	-0.5	2
20 To revitalise town centres	-1	2	2	-2	-2
21 To encourage efficient patterns of movement in support of economic growth	-1	2	2	-2	2
22 To encourage and accommodate both indigenous and inward investment	1	2	2	-1	-0.5
<b>Average</b>	<b>0.48</b>	<b>1.50</b>	<b>1.60</b>	<b>-1.23</b>	<b>0.30</b>

## Development of Strategic Sites

### Introduction

- 8.12 Strategic sites identified in the Core Strategy Preferred Options and Strategic Sites Issues and Options Document have been subject to an assessment in order to determine their performance in sustainability terms, with reference to social, environmental and economic factors. These sites are located around Bury St Edmunds and Haverhill. The rationale used for the sites assessment, its results and a discussion of the relative merits and disadvantages of the strategic sites options are set out below.
- 8.13 Existing SA guidance recognises that the most familiar form of SA prediction and evaluation is generally broad-brush and qualitative. It is recognised that quantitative predictions are not always practicable and broad-based and qualitative predictions can be equally valid and appropriate. Examples of the prediction and evaluation techniques for assessing significance of effects are expert judgement, dialogue with stakeholders and public participation, geographical information systems, reference to legislation and regulations and environmental capacity. Many of these techniques have been employed in this assessment.

### Assessment Methodology

- 8.14 For the assessment of the sites there was a need to devise location specific SA criteria to cover, for example, accessibility to schools, healthcare facilities and other community services, accessibility to public transport, identify specific environmental constraints and facilities and establish the proposed site uses. Table 8.3 below presents the SA Framework adopted for the assessment of the strategic sites. Three SA objectives have been excluded from the strategic sites sustainability appraisal framework, as the indicators developed to measure the progress in achieving them, were deemed to be beyond the sphere of influence of the strategic site allocation process. These objectives are as follows:
- Objective 3: To reduce crime and anti-social activity;
  - Objective 11: To use water and mineral resources efficiently, and re-use and recycle where possible; and
  - Objective 12: To reduce waste.

Table 8.3 – Strategic Sites Sustainability Appraisal Framework

SA Objective		Decision Making Criteria	Indicator
<b>Social</b>			
1	To improve health of the population overall and reduce health inequalities	Is there adequate access to health facilities?	Is it within 30 mins of a GP, dentist and hospital by public transport?
		Will it encourage healthy lifestyles?	Will it lead to a direct loss of public open space or open access land?
			Will it improve accessibility by Public Rights of Way?
2	To maintain and improve levels of education and skills in the population overall	Will it improve qualifications and skills of young people?	Is it within 30 mins of a school by public transport? Is it within walkable/cyclable distances (800m and 2-5km)?
			Is it within walkable/cyclable distances (800m and 2-5km)?
4	To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	Will the site be located near or within LSOAs in the most deprived 20% to 40% in the country?
5	To improve access to key services for all sectors of the population	Will it improve accessibility to key local services?	Is it within 30 mins of the town centre by public transport?
			Is it within walkable/cyclable distances (800m and 2-5km) to key services?
		Will it improve accessibility to shopping facilities?	Is it within 30 mins of a supermarket/ shopping centre by public transport?
			Is it within walkable/cyclable distances (800m and 2-5km) to supermarkets/shopping centre?
		Will it improve accessibility and decrease the need of travel?	Is the site proposed for mixed-use development with good accessibility to local facilities?
6	To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce the unemployment overall?	Is the site proposed for employment or mixed use with employment included?

7	To meet the housing requirements of the whole community	Will it increase the range and affordability of housing for all social groups?	Is the site proposal over the relevant thresholds for the application of affordable housing policy? CS Policy 6 defines that, for Bury St. Edmunds and Haverhill, for sites of 0.5ha and above, or 15 dwellings or more, 40% shall be affordable; for sites between 0.3ha and 0.5ha or between 10 and 14 dwellings, 30% shall be affordable, and for sites between 0.17ha and 3ha or between 5 and 9 dwellings, 20% should be affordable.
8	To improve the quality of where people live and encourage community participation	Will it increase access to natural green space?	Is the site proposed in a location with accessible natural green space?
<b>Environmental</b>			
9	To improve water and air quality	Will it avoid development in areas protected for water quality reasons?	Is the site proposed within a groundwater source protection zone?
			Is the site proposed within a water abstraction management area?
		Will it improve air quality?	Is the site proposed within an Air Quality Management Area (AQMA)?
10	To conserve soil resources and quality	Will it minimise the loss of Greenfield land to development?	Is the site proposed on Greenfield land?
		Will it minimise the loss of the best and most versatile agricultural land to development?	Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3a)?
		Will it maintain and enhance soil quality?	Will it lead to remediation of contaminated land?
13	To reduce the effects of traffic on the environment	Will it decrease the need for local travel?	Does the site have good accessibility to local facilities (as assessed above)?
14	To reduce contributions to climate change	Will it increase the proportion of energy needs being met by renewable sources?	Will the site proposal promote the incorporation of small-scale renewable in developments? Note: Adherence to Policy ENG1 of the Regional Plan which requires that new development of more than 10 dwellings or 1,000m <sup>2</sup> of non residential floor space






			should secure at least 10% of their energy from decentralised and renewable or low-carbon sources, was coded green.
		Will it reduce emissions of greenhouse gases by reducing energy consumption?	Is there a clear commitment to meet Code Level 3 or above of the Government's Code for Sustainable Homes? Note: Adherence to Policy CS2 was coded green, as meeting Code Level 3 or achieving high BREEAM rating under this Policy will help minimise CO <sub>2</sub> emissions.
15	To reduce vulnerability to climatic events	Will it minimise the risk of flooding to people and property from rivers and watercourses?	Does the site lie within the flood risk zones (2, 3a, 3b) identified in the SFRA and have a proposed 'non-compatible' use or is located within 9m of a river?
16	To conserve and enhance biodiversity and geodiversity	Will it maintain and enhance sites designated for their nature conservation interest?	Is the site in proximity to a Special Protection Area (SPA), Special Area of Conservation (SAC) or Site of Special Scientific Interest (SSSI)? Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 2km of a SPA, SAC or SSSI.
			Is the site in proximity to a County Wildlife Site, Local Nature Reserve or Ancient Woodland? Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 500m of a site.
		Will it avoid disturbance or damage to protected species and their habitats?	Are BAP habitats and species known to be on the site?
		Will it protect and enhance sites, features and areas of geological value?	Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS (Regionally Important Geological/Geomorphological Sites). The site within 1km of a SSSI will be coded red and within 500m will be coded amber. The site adjacent to RIGS will be coded red and within 500m - amber.

17	To conserve and where appropriate enhance areas of historical and archaeological importance	Will it protect and enhance sites, features and areas of historical and cultural value?	Are there any listed buildings on or adjacent to the site?
			Is the site in or adjacent to a Conservation Area? Note: The sites located in a Conservation Area were coded red, those within 40 metres of a town Conservation Area or within 800m of a village Conservation Area (PPG2 criteria) were coded orange and sites not located in proximity to any Conservation Areas were coded green.
			Is the site in or adjacent to a Historic Park and Garden? Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 40m of a Historic Park and Garden.
			Is the site in or adjacent to a Scheduled Ancient Monument (SAM)? Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 40m of a SAM.
		Will it protect and enhance sites, features and areas of archaeological value?	Is the site in or adjacent to an Area of Archaeological Importance or a potential archaeological site? Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 40m of an Area of Archaeological Importance or a potential archaeological site.
18	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Will it improve the landscape or townscape?	Is the site in or adjacent to a Green Corridor? Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 40m of a Green Corridor.
			Will the site development lead to coalescence of urban extensions with nearby villages?

Economic			
19	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Will it improve business development and enhance competitiveness?	Is the site proposed for mixed-use development or employment?
20	To revitalise town centres	Will it increase the range of employment opportunities, shops and services available in town centres?	Is the site proposed for mixed-use development or employment in town centres?
21	To encourage efficient patterns of movement in support of economic growth	Will it improve accessibility to work by public transport, walking and cycling?	Is the site proposed in a proximity to a public transport route or in a walkable/cyclable distance?
22	To encourage and accommodate both indigenous and inward investment	Will it make land available for business development?	Will it increase employment land availability?

8.15 The assessment of the sites was undertaken using the following qualitative assessment scale:

**Table 8.4 - Key to Strategic Sites Assessment**

	In conformity with the criterion		Not relevant to criterion / Neutral effects
	Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified		Insufficient information is available
	In conflict with the criterion		

## Assessment Results

8.16 Overall, the strategic sites are assessed as having significantly positive effects on most of the SA social objectives through the following:

- provision of affordable housing, the proportion of which is determined by the thresholds outlined in the Core Strategy,
- good accessibility to healthcare facilities and opportunities for healthier life style; and
- good accessibility to natural green spaces for informal recreation.

8.17 Although some of the sites are not located within walkable distance to schools or other local facilities, as the sites represent urban extensions, they are still considered to offer a good level of accessibility to key local services by cycling or public transport.

8.18 In terms of environmental SA objectives, Table 8.5 demonstrates that a range of positive (sustainable) and negative (unsustainable) factors affect each strategic site proposal. The most commonly observed positive factors for all sites are as follows:

- development on all the sites is expected to contribute to CO<sub>2</sub> reductions, as a result of adherence to the Core Strategy Policy 2 (Sustainable Development);
- development of the sites will not lead to a loss of or damage to designated geological sites, as there are no geological SSSI or RIGS close to any of the strategic sites, nor to any Historic Park and Garden, Area of Archaeological Importance or Green Corridor.

8.19 The most frequently observed unsustainable factors of these strategic sites are their location on greenfield land, which is also often of high agricultural value, and being within water abstraction management areas. Some of the sites also perform poorly as they are completely or partially located within groundwater source protection zones and flood risk zones, and are located in close proximity to SSSI and Local Nature Reserves.

8.20 More specifically, Haverhill Site 3 contains a SAM and Bury Site 1 is located adjacent to a village Conservation Area, potentially affecting its settings. Haverhill Site 1 and Haverhill Site 2 are both located adjacent to BAP habitats (wet woodland) and to village Conservation Areas, Bury Site 3 North of Westley Road contains 3 Listed Buildings and Bury Site 4 is located adjacent to a Conservation Area and to a SAM. Bury Site 1 is located in close proximity to Fornham All Saints and Bury Site 3 North of Westley Road is located in close proximity to Westley. Therefore, the development of these sites should include consideration as to how to avoid the coalescence of these urban extensions with Fornham All Saints and Westley.

8.21 On the whole, the development of the strategic sites is likely to deliver significantly positive effects against most of the SA economic objectives. Development of the sites is likely to contribute to sustainable levels of prosperity and economic growth, encourage efficient patterns of movement as well as encourage and accommodate both indigenous and inward investment.

8.22 Although all strategic sites have a combination of sustainable and unsustainable factors affecting them, the most sustainable strategic sites are considered to be:

- **Bury Site 2**, proposed for residential and mixed use development, is predicted to have positive effects against most of the sustainability objectives. The site forms an urban extension to Bury St Edmunds of 48.63ha. Its development would increase the area of Bury St Edmunds and result in the loss of a comparatively large area of greenfield agricultural



land. However, the site would benefit from the services offered within Bury St Edmunds and it has the advantage of being located close to a public transport route - the nearest bus stop is located approximately 1km from the site with good accessibility to local facilities. The proposed site is not within or in close proximity to any statutory or locally designated sites and it is not located within an area of flood risk. The site will also lead to prosperity and economic growth and will encourage and be able to accommodate both indigenous and inward investment.

- **Bury Site 3 North of Westley Road**, abuts Bury St Edmunds settlement boundary and it is a large-scale development (50+ha) that would significantly increase the area of Bury St Edmunds and result in the loss of a large area of greenfield agricultural land. The development of the site may lead to coalescence of the urban extension with Westley and may affect the quality of groundwater, as it is located within a water abstraction management area and a groundwater source protection zone 2. On the positive side, the site would benefit from the services offered within Bury St. Edmunds and it has the advantage of being located close to a public transport route - the nearest bus stop is located approximately 50m from the site and to a Public Right of Way. The site is proposed for mixed use with employment included and has good accessibility to local facilities. The proposed site is not within or in close proximity to any statutory or locally designated sites and is not located within a flood zone. The site will also lead to prosperity and economic growth, will encourage efficient patterns of movement to support that economic growth and will encourage and be able to accommodate both indigenous and inward investment.
- **Bury Site 5**, with 54.49ha proposed for residential and commercial development with additional ancillary uses (with employment), the site abuts Bury St Edmunds settlement boundary and has good accessibility to local facilities. Its development would lead to a comparatively substantial increase in the area of Bury St Edmunds and result in the loss of a large area of greenfield agricultural land. It may also affect the quality of groundwater, as it is located within a water abstraction management area and a groundwater source protection zone 2. However, the site is not located within a flood risk area. The proposed site is located in proximity to the Glen Chalk Caves SSSI. Similarly to the other proposed sites, this site would benefit from the services offered within Bury St. Edmunds and it would have the advantage of being located close to a public transport route - the nearest bus stop is located approximately 100m from the site and to Public Rights of Way. The site will also lead to prosperity and economic growth, will encourage efficient patterns of movement to support that economic growth and will encourage and be able to accommodate both indigenous and inward investment.

Table 8.5 – Summary of Strategic Sites Assessment

SA Objective		Indicator	Haverhill - Site 1	Haverhill - Site 2	Haverhill - Site 3	Bury - Site 1	Bury - Site 2	Bury - Site 3 North of Westley Rd	Bury - Site 3 South of Westley Rd	Bury - Site 4	Bury - Site 4a	Bury - Site 5	Bury - Site 6
<b>Social</b>													
1	To improve health of the population overall and reduce health inequalities	Is it within 30 mins of a GP, dentist and hospital by public transport?											
		Will it lead to a direct loss of public open space or open access land?											
		Will it improve accessibility by Public Rights of Way?											
2	To maintain and improve levels of education and skills in the population overall	Is it within 30 mins of a school by public transport?											
		Is it within walkable/cyclable distances (800m and 2-5km)?											
4	To reduce poverty and social exclusion	Will the site be located near or within LSOAs in the most deprived 20% to 40% in the country?											
5	To improve access to key services for all sectors of the population	Is it within 30 mins of the town centre by public transport?											
		Is it within walkable/cyclable distances (800m and 2-5km) to key services?											
		Is it within 30 mins of a supermarket/ shopping centre by public transport?											
		Is it within walkable/cyclable distances (800m and 2-5km) to supermarkets/shopping centre?											
		Is the site proposed for mixed-use development with good accessibility to local facilities?											
6	To offer everybody the opportunity for rewarding and satisfying employment	Is the site proposed for employment or mixed use with employment included?											

SA Objective		Indicator	Haverhill - Site 1	Haverhill - Site 2	Haverhill - Site 3	Bury - Site 1	Bury - Site 2	Bury - Site 3 North of Westley Rd	Bury - Site 3 South of Westley Rd	Bury - Site 4	Bury - Site 4a	Bury - Site 5	Bury - Site 6
7	To meet the housing requirements of the whole community	Is the site proposal over the relevant thresholds for the application of affordable housing policy?											
8	To improve the quality of where people live and encourage community participation	Is the site proposed in a location with accessible natural green space?											
<b>Environmental</b>													
9	To improve water and air quality	Is the site proposed within a groundwater source protection zone?											
		Is the site proposed within a water abstraction management area?											
		Is the site proposed within an Air Quality Management Area (AQMA)?											
10	To conserve soil resources and quality	Is the site proposed on Greenfield land?											
		Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3a)?											
		Will it lead to remediation of contaminated land?	?	?	?						?		
13	To reduce the effects of traffic on the environment	Does the site have good accessibility to local facilities (as assessed above)?											
14	To reduce contributions to climate change	Will the site proposal promote the incorporation of small-scale renewable in developments?											
		Is there a clear commitment to meet Code Level 3 or above of the Government's Code for Sustainable											

SA Objective		Indicator	Haverhill - Site 1	Haverhill - Site 2	Haverhill - Site 3	Bury - Site 1	Bury - Site 2	Bury - Site 3 North of Westley Rd	Bury - Site 3 South of Westley Rd	Bury - Site 4	Bury - Site 4a	Bury - Site 5	Bury - Site 6
		Homes?											
15	To reduce vulnerability to climatic events	Does the site lie within the flood risk zones (2, 3a, 3b) identified in the SFRA and have a proposed 'non-compatible' use or is located within 9m of a river?											
16	To conserve and enhance biodiversity and geodiversity	Is the site in proximity to a Special Protection Area (SPA), Special Area of Conservation (SAC) or Site of Special Scientific Interest (SSSI)?											
		Is the site in proximity to a County Wildlife Site, Local Nature Reserve or Ancient Woodland?											
		Are BAP habitats and species known to be on the site?											
		Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS (Regionally Important Geological/Geomorphological Sites).											
17	To conserve and where appropriate enhance areas of historical and archaeological importance	Are there any listed buildings on or adjacent to the site?											
		Is the site in or adjacent to a Conservation Area?											
		Is the site in or adjacent to a Historic Park and Garden?											
		Is the site in or adjacent to a Scheduled Ancient Monument (SAM)?											
		Is the site in or adjacent to an Area of Archaeological Importance or a potential archaeological site?											
18	To conserve and	Is the site in or adjacent to a Green											

SA Objective		Indicator	Haverhill - Site 1	Haverhill - Site 2	Haverhill - Site 3	Bury - Site 1	Bury - Site 2	Bury - Site 3 North of Westley Rd	Bury - Site 3 South of Westley Rd	Bury - Site 4	Bury - Site 4a	Bury - Site 5	Bury - Site 6
	enhance the quality and local distinctiveness of landscapes and townscapes	Corridor?											
		Will the site development lead to coalescence of urban extensions with nearby villages?											
Economic													
19	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Is the site proposed for mixed-use development or employment?											
20	To revitalise town centres	Is the site proposed for mixed-use development or employment in town centres?											
21	To encourage efficient patterns of movement in support of economic growth	Is the site proposed in a proximity to a public transport route or in a walkable/cyclable distance?											
22	To encourage and accommodate both indigenous and inward investment	Will it increase employment land availability?											

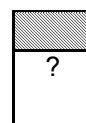
Key:



In conformity with the criterion

Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified

In conflict with the criterion



Not relevant to criterion / Neutral effects

Insufficient information is available

## 9. Assessment of Submission Core Strategy Policies

- 9.1 This assessment was undertaken of the Core Strategy Draft Document dated 1<sup>st</sup> June 2009. Subsequent to this assessment a number of changes were been made by the Council to the policies. The final set of policies is presented in section 12.

### Core Strategy Policies

- 9.2 The St Edmundsbury Core Strategy Draft Document dated 1<sup>st</sup> June 2009 sets out 16 policies. The majority of the Core Strategy policies have been assessed separately against the SA framework. However, the two policies, Policy CS1 St Edmundsbury Spatial Strategy and Policy CS5 Settlement Hierarchy and Identity that relate to a similar theme have been grouped and assessed together to facilitate the effectiveness of appraisal and reduce the potential for repetition or contradiction. Table 9.1 details the draft Core Strategy policies.

### Results of the Assessment

- 9.3 Appendix D presents the results of the detailed appraisal of the potential effects of the draft Core Strategy policies predicted to arise from implementation of the policies. The section below presents an analysis of the detailed appraisal in terms of the significance of direct effects and potential cumulative effects and recommendations for improving the sustainability of the policies. Suggestions for mitigation of adverse effects or enhancement of positive ones are also set out.
- 9.4 The assessment is based on certain important assumptions with regard to the SA objectives which are detailed in Table 9.2.
- 9.5 Table 9.3 presents a summary of the significance of direct effects from the detailed appraisal. The significance of effects is denoted using the following system of symbols:

+++	Strongly positive
++	Moderately positive
+	Slightly positive
0	No effect
-	Slightly negative
--	Moderately negative
---	Strongly negative
+/-	Combination of positive and negative effects / neutral effect

- 9.6 For the purposes of analysing the results of the assessment, significant effects are those that result in strongly or moderately negative or positive effects.
- 9.7 It should be emphasised that the information quality, and attendant uncertainties and assumptions required to address them, vary across the evidence base for the SA objectives. This has been systematically recorded and taken into account in the detailed appraisal sheets (see Appendix D). Thus, where a major effect has been predicted for a particular SA objective, but the evidence base for this contains uncertainties or its interpretation requires a number of assumptions, the measure of information quality recorded in the appraisal has been reduced, and this is reflected in the calculation of the effect significance (see Section 2 for further details of the appraisal methodology).

**Table 9.1 – Core Strategy Policies** (as in Core Strategy Draft Document of June 2009)

No	Policy Name	Policy Description
1.	Policy CS1 St. Edmundsbury Spatial Strategy and Policy CS5: Settlement Hierarchy and Identity	<p><i>Policy CS1</i></p> <p>To date (1 April 2008) development (including land with a valid planning consent but not yet built) provided for 6,380 new homes and has been distributed across the borough as follows:</p> <ul style="list-style-type: none"> <li>• Bury St Edmunds 42%</li> <li>• Haverhill 40%</li> <li>• Rural Area 17%</li> </ul> <p>During the remainder of the LDF period, to 2031, new homes will be distributed as follows:</p> <p>Bury St Edmunds 5,950:</p> <ul style="list-style-type: none"> <li>• Previously developed land 650+</li> <li>• Greenfield 1,800</li> <li>• Strategic Urban Extensions 3,500</li> </ul> <p>Haverhill 3,900:</p> <ul style="list-style-type: none"> <li>• Previously developed land 250</li> <li>• Greenfield 1,150</li> <li>• Strategic Urban Extensions 2,500</li> </ul> <p>Rural Area:</p> <ul style="list-style-type: none"> <li>• Previously developed land 105</li> <li>• Greenfield</li> </ul> <p>Area Action Plans for Bury St Edmunds and Haverhill and a Site Allocations Development Plan Document for the rural area will identify the location and precise boundaries of future development land.</p> <p><i>Policy CS5</i></p> <p>All proposals for new development will be expected to have regard to the position of the site within the settlement hierarchy. Careful consideration will be given to maintaining the identity, character and historical context of settlements, to ensure new development does not detract from the environmental quality, townscape and functional vitality of the settlement as a whole. The coalescence of towns with surrounding settlements through new development will not be allowed to happen.</p>
2.	Policy CS2 Sustainable Development	<p>A high quality, sustainable environment will be achieved by designing and incorporating measures appropriate to the nature and scale of development, including:</p> <p>The protection and enhancement of natural resources:</p>

		<ul style="list-style-type: none"> <li>a) making the most efficient use of land and infrastructure;</li> <li>b) protecting and enhancing biodiversity, wildlife and geodiversity, and avoiding impact on areas of nature conservation interest;</li> <li>c) safeguarding and enhancing wildlife corridors and ecological networks;</li> <li>d) conserving and, wherever possible, enhancing the character and quality of local landscapes and the wider countryside and public access to them, in a way that recognises and protects the fragility of these resources;</li> <li>e) conserving other natural resources including, air quality and soil and, wherever possible, enhancing them;</li> <li>f) protecting the quality and potential yield of water resources;</li> <li>g) maximising the efficient use of water including recycling of dirty water; and sustainable design of the built environment;</li> <li>h) providing the infrastructure and services necessary to serve the development;</li> <li>i) minimising the use of resources and energy, and exploring the feasibility and viability of decentralised energy (low carbon and/or renewable) in all new developments;</li> <li>j) incorporating the principles of sustainable construction including provision for recycling; and the minimisation of energy and resource efficiency at construction and occupancy phases. Developments should comply with the appropriate national standards such as the Code for Sustainable Homes and BREEAM;</li> <li>k) wherever possible, creating carbon neutral development;</li> <li>l) orientating buildings to maximise the benefit from sunlight and passive solar heating unless to do so would conflict with the grain of the surrounding area's townscape, landscape or topography;</li> <li>m) aiming to meet, as a minimum, Code Level 3 of the Government's Code for Sustainable Homes for new-build dwellings;</li> <li>n) maximising the use of recycled materials;</li> <li>o) taking account of flood risk;</li> <li>p) considering the natural drainage of surface water, including, where appropriate, the use of Sustainable Urban Drainage Systems (SUDS);</li> <li>q) making a positive contribution towards the vitality of the area through an appropriate mix of uses. In areas of strategic growth this will include employment, community, social, health and recreation facilities (including the protection and provision of informal and formal recreation, parks, open spaces and allotments);</li> <li>r) creating a safe environment which enhances the quality of the public realm;</li> <li>s) making a positive contribution to local distinctiveness, character, townscape and the setting of settlements;</li> </ul>
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		t) wherever possible, conserving or enhancing the historic environment including archaeological resources.
3.	Policy CS3: The Natural and Built Environment	The diversity, character and quality of the natural and built environment will be protected, conserved, managed, and where possible enhanced. A network of designated sites, protected habitats and species (BAPS), wildlife or green corridors, and other green spaces will be identified and protected and habitat creation supported through policies in the Development Management DPD and other DPDs in the Local Development Framework
4.	Policy CS4: Design and Local Distinctiveness	<p>Proposals for new development must create and contribute to a high quality, sustainable environment. Proposals will be expected to address, as appropriate, the following components:</p> <ul style="list-style-type: none"> <li>• detailed heritage and conservation design appraisals and information;</li> <li>• consideration of protection of the landscape and historic views;</li> <li>• an understanding of the local context and an indication of how the proposal will enhance the area;</li> <li>• protection of the natural environment;</li> <li>• in housing proposals the density and mix of housing;</li> <li>• provision or enhancement of open space, play, leisure and cultural facilities;</li> <li>• access and transport considerations.</li> </ul> <p>Concept Statements and Masterplans will be required for sites which by virtue of size, location or proposed mix of uses are determined by the local planning authority to require a masterplanning approach. A landscape/townscape character appraisal will be an essential prerequisite for concept statements, design briefs and master plans. Area Action Plans and Site Allocations DPDs will define those sites where this approach is required.</p> <p>The promotion of secure attractive, safe and people-friendly streets, to encourage more walking, cycling, recreation and local shopping, will be a priority for the council. Where appropriate the street environment will be improved/developed with a combination of the following (not exclusive):</p> <ul style="list-style-type: none"> <li>• Quality pavements and well-coordinated street furniture</li> <li>• Improvements to footpaths and cycle routes</li> <li>• Street trees and well-maintained landscaping</li> <li>• Clear and minimal signage</li> <li>• Traffic management schemes</li> <li>• Shared spaces and home zones</li> <li>• Cycle paths</li> <li>• Crime deterrence and safety measures, including lighting and CCTV</li> <li>• Public art</li> </ul>

		New developments will be required to contribute towards public realm improvements. They should also provide active street frontages to create attractive and safe street environments.
5.	Policy CS6: Affordable Housing	<p>Developers will be expected to allocate land within sites where housing is proposed to ensure that affordable housing is provided</p> <p>In Bury St Edmunds and Haverhill:</p> <ul style="list-style-type: none"> <li>i. Where sites are 0.5 hectares and above or 15 dwellings or more are proposed, 40% shall be affordable.</li> <li>ii. Where sites are between 0.3 hectares and 0.5 hectares or between 10 and 14 dwellings, 30% shall be affordable.</li> <li>iii. Where sites are between 0.17 hectares and 0.3 hectares or between 5 and 9 dwellings, 20% shall be affordable.</li> </ul> <p>In other settlements, on sites of 0.17 hectares and above or 5 dwellings or more, 40% shall be affordable. These criteria shall also apply where a site is part of a wider but contiguous site. Conditions or legal obligations will be used to ensure that affordable housing is secured and retained for those in housing need.</p> <p>The Local Planning Authority will consider issues of development viability and mix, including additional costs associated with the development of brownfield sites and the provision of significant community benefits, and may be willing to negotiate a lower percentage of affordable housing.</p> <p>Note: This policy applies to both new build and conversion housing schemes.</p>
6.	Policy CS7: Gypsy and Travellers Accommodation	<p>In the countryside, proposals for gypsy sites and travelling show people will be permitted where:</p> <ul style="list-style-type: none"> <li>a) the site has been identified in the DPD, or in the interim, where satisfactory evidence supporting a need for the accommodation is provided;</li> <li>b) the use of the site would not have an adverse impact upon the amenities of nearby occupiers;</li> <li>c) the proposal would not detract from the undeveloped open and rural character and appearance of the countryside; and</li> <li>d) adequate landscaping measures are included.</li> </ul> <p>A condition or legal agreement to control the future use of sites for gypsies and travelling show people may be imposed, as appropriate.</p> <p>Where the proven need is short term the development will be limited by a temporary permission.</p>
7.	Policy CS8: Sustainable Transport	<p>The council will develop and promote a high quality and sustainable transport system across the borough and reduce the need for travel through spatial planning and design</p> <p>All proposals for development will be required to provide for travel by a range of means of transport other than the private car in accordance with the following hierarchy:</p>

		<ul style="list-style-type: none"> <li>• Walking</li> <li>• Cycling</li> <li>• Public Transport (including taxis)</li> <li>• Commercial vehicles</li> <li>• Cars</li> </ul> <p>All development proposals will be required to be accessible to people of all abilities including those with mobility impairments</p> <p>New commercial development, including leisure uses and visitor attractions, which generate significant demands for travel, should be located in areas well served by a variety of transport modes. Where appropriate, development proposals that will have significant transport implications will be required to have a transport assessment and travel plan showing how car based travel to the site can be minimised.</p>
8.	Policy CS9: Strategic Transport Improvements	<p>The council will continue to work with relevant partners, including Suffolk County Council and the Highways Agency, and developers, to secure the necessary transport infrastructure to achieve improvements to:</p> <ul style="list-style-type: none"> <li>• Junctions 42 and 44 of the A14 adjacent to Bury St Edmunds</li> <li>• Transport safety on the A1307 between Haverhill and the A11</li> <li>• Relieve the adverse impacts of traffic in Bury St Edmunds, Haverhill and those villages which have identified transport issues</li> <li>• Rail infrastructure in the borough</li> <li>• The public transport network in the towns and rural areas</li> <li>• Rights of way in the borough to achieve the objectives of the Suffolk Rights of Way Improvement Plan.</li> </ul>
9.	Policy CS10: Employment and the Local Economy	<p>Employment land will be allocated in sustainable locations in the towns of Bury St Edmunds and Haverhill. Existing General Employment Areas in or near Key Service Centres or Local Service Centres will continue to be protected and promoted for employment uses.</p> <p>Policies in Local Development Documents will ensure that Bury St Edmunds can fulfil its role as a Key Centre for Development and Change by providing for quality employment development at the Suffolk Business Park, and that Haverhill can continue to meet the local employment needs in the Greater Cambridge area, particularly those of research and development and bio-technology industries.</p> <p>Existing employment areas will continue to meet local and sub-regional needs at Clare, Great Wrating, Chedburgh, Barnham, Saxham and Stanton/Hepworth (Shepherd's Grove).</p> <p>Proposals for growth in Key Service Centres and Local Service Centres will be expected to include provision for employment land and premises to meet local needs and encourage sustainable communities.</p> <p>Policies in Local Development Documents will set criteria for the continued encouragement of sustainable</p>

		employment development and tourism development opportunities (including conversion of suitable buildings) in villages and rural areas.
10.	Policy CS11: Retail, Leisure and Office Development	<p>The town centres of Bury St Edmunds and Haverhill will continue to be the focus for new retail, leisure and office development, taking into account;</p> <ul style="list-style-type: none"> <li>• the need to maintain their vitality and viability</li> <li>• the requirement to assess the need for future growth</li> <li>• the sequential approach to development</li> <li>• the impact of any development on existing centres</li> <li>• the need to ensure locations are accessible by a variety of modes of transport</li> </ul> <p>Retail and leisure activity elsewhere will be focused on those Key Service and Service Centres identified in Core Strategy Policy CS5 and in the new local centres located in the areas for growth identified in Policies CS12 and CS13. The development of services and facilities in these locations will be expected to be of an appropriate scale and character to reflect the role and function of the local centres and in accordance with the sequential approach.</p>
11.	Policy CS12: Bury St. Edmunds Strategic Growth	<p>See Core Strategy and assessment of strategic sites:  Limited growth to the north -west (strategic sites 1 and 2)  Limited growth to the west (strategic site 3)  Further growth at Moreton Hall (strategic site 5)  Long term strategic growth - north east Bury St. Edmunds (strategic site 6)  Long term strategic growth - south east Bury St. Edmunds (strategic sites 4 and 4a).</p>
12.	Policy CS13: Haverhill Strategic Growth	<p>Land on the north-eastern edge of Haverhill will accommodate the future long term strategic growth for the town and will provide;</p> <ul style="list-style-type: none"> <li>• At least 2,200 homes</li> <li>• Improved connections to the existing built up area with a network of foot and cycle links to the town centre and employment areas</li> <li>• Protection so that the ridge and the visual boundary with Kedington is not breached</li> <li>• Protection for the Scheduled Ancient Monument at Wilsey Farm</li> <li>• New strategic public open space and recreation facilities</li> <li>• Education, social and recreational facilities</li> <li>• Local employment facilities</li> <li>• Opportunities for renewable energy generation and efficient use of resources</li> <li>• An opportunity to explore the potential for a North-eastern relief road.</li> </ul>
13.	Policy CS14: Phasing	In accordance with the spatial strategy, the Council will promote the re-use of previously developed land

		<p>within housing settlement boundaries ahead of releasing greenfield sites for new neighbourhoods. The need to release land for new neighbourhoods will be assessed against the release of potential release of sites within the existing urban areas of the towns concerned. Matters to be considered in making such an assessment will include:</p> <p>§ The potential to deliver national and regional targets for the development of previously developed land;  § The projected delivery of the annual target for constructing new homes in the borough;  § The delivery of required infrastructure; and  § Achieving the objectives of the spatial strategy.</p>
14.	Policy CS15: Infrastructure	<p>All new proposals for development will be required to demonstrate that the necessary on and off-site infrastructure capacity required to support the development and to mitigate the impact of it on existing community facilities exists or will exist prior to that development being occupied.</p> <p>In circumstances where the provision or improvement of infrastructure or other works or facilities is necessary, both within and beyond the borough boundary, to address community or environmental needs associated with new development or to mitigate the impact of development on the environment or existing communities, standard charges and/or standard formulae will be imposed for the payment of financial contributions towards such infrastructure, works or facilities to ensure that all such development makes an appropriate and reasonable contribution to the costs of provision.</p> <p>The requirement to pay the standard charge and/or standard formulae will be reviewed and modified as appropriate in circumstances where the provision of infrastructure, works or facilities normally covered by standard charges is to be provided as part of the development proposals.</p> <p>The provision of infrastructure will be linked directly to phasing of development on land throughout the borough to ensure that there is no detrimental impact on existing infrastructure, the environment or residential amenity. It will be coordinated and delivered in partnership with other authorities and agencies such as the local highways authority, local education authority, the environment agency, primary car trusts, utility companies and other private and public sector partners.</p>

**Table 9.2 – Assessment Rationale for Policies Assessment**

	SA Objective	Assessment Rationale
<b>Social</b>		
1.	To improve health of the population overall and reduce health inequalities	<p>Consideration of:</p> <ul style="list-style-type: none"> <li>Whether policies improve access to health facilities, and indirectly improve health for all.</li> <li>Secondary consideration of reducing air pollution, ensuring homes are of a decent standard, and other indirect or longer-term effects upon health.</li> <li>Secondary effects considered of improving walking and cycling infrastructure, recreational opportunities and the positive effect on improving levels of health.</li> <li>Policies that promoted enhancing existing or developing new green spaces were considered as this could lead to increasing recreational opportunities. The relationship between adequate provision of green space and other aspects of health were also assessed – such as green spaces/parks providing relaxation areas and relationship to stress levels.</li> </ul>
2.	To maintain and improve levels of education and skills in the population overall	<p>Consideration of:</p> <ul style="list-style-type: none"> <li>Whether policies would directly provide educational, training and learning facilities for the local population.</li> <li>Whether policies would indirectly provide opportunities for learning (e.g. nature trails), employment based training and development.</li> <li>Whether policies would improve accessibility to educational opportunities or learning facilities.</li> <li>Secondary considerations of adequate housing provision, as having indirect positive effects on retaining local skills.</li> </ul>
3.	To reduce crime and anti-social activity	<p>Consideration of:</p> <ul style="list-style-type: none"> <li>The degree to which policies would reduce crime and the fear of crime through indirect measures such as incorporating design features in new development (such as additional lighting, CCTV) and enhancing natural surveillance.</li> </ul>
4.	To reduce poverty and social exclusion	<p>Consideration of:</p> <ul style="list-style-type: none"> <li>The extent to which policies sought to improve access to essential facilities such as employment and housing to all sectors of the borough. This included the effects of locational policies on access, as well as the provision of transportation infrastructure in connecting such locations.</li> <li>Provision of an adequate proportion of affordable housing to ensure social inclusion and diversity within communities.</li> </ul>
5.	To improve access to key services for all sectors of the population	<p>Consideration of:</p> <ul style="list-style-type: none"> <li>Whether policies would improve directly or indirectly accessibility to services and facilities through siting, improved transport measures, pedestrian and cycle links, specific community facilities, and open space.</li> </ul>

	SA Objective	Assessment Rationale
6.	To offer everybody the opportunity of rewarding and satisfying employment	Consideration of: <ul style="list-style-type: none"> <li>The extent to which the different policies would attract workers with key skills that are locally in demand (link with the economic objectives in supporting economic activity).</li> <li>The effect of the policy in terms of offering opportunities for employment based training and development.</li> <li>Whether policies would improve accessibility to employment opportunities through siting and type of development as well as transportation infrastructure.</li> </ul>
7.	To meet the housing requirements of the whole community	Consideration of: <ul style="list-style-type: none"> <li>The extent to which policies would result in meeting the identified housing targets in the short, medium and long term and identified needs such as quality of housing appropriate to local needs and affordability.</li> </ul>
8.	To improve the quality of where people live and to encourage community participation	Consideration of whether policies promote high quality design in housing, public realm, preserve and enhance residential amenity and encourage people to take pride in their local community.
<b>Environmental</b>		
9.	To improve water and air quality	Consideration of: <ul style="list-style-type: none"> <li>Whether policies would result in reductions or increases in traffic derived pollutant concentrations.</li> <li>Effect of the use of more sustainable modes of transport, reductions in vehicle use leading to improvements in air quality.</li> <li>Positive effects on water quality as a result of reductions in volume of traffic and reduced concentrations of pollution in run-off.</li> <li>Whether policies would lead to a loss of Greenfield land and result in increased hard surfaces giving rise to polluted run off and impacting the water cycle.</li> </ul>
10.	To conserve soil resources and quality	Consideration of: <ul style="list-style-type: none"> <li>How policies will reduce or increase soil contamination and safeguard soil quality and quantity, including high quality agricultural land. This includes considerations of greenfield land take.</li> <li>Development types (e.g. approach to infilling) and densities.</li> </ul>
11.	To use water and mineral resources efficiently, and re-use and recycle where possible	Consideration of: <ul style="list-style-type: none"> <li>Whether policies would promote efficiency in use of water and other natural resources.</li> <li>Whether policies would directly reduce energy demand and incorporate renewable energy.</li> </ul>
12.	To reduce waste	Consideration of: <ul style="list-style-type: none"> <li>Whether policies directly reduce the generation of waste and recycling of waste against standard levels expected for development, e.g. by providing recycling facilities within and near to homes.</li> <li>Construction waste reduction, re-use and recycling.</li> </ul>

	SA Objective	Assessment Rationale
13.	To reduce the effects of traffic on the environment	Consideration of the extent to which policies would provide sustainable modes of transport, or promote the use of such modes and restrict the use of cars, by their location, quality of the pedestrian and cyclist environment, design, or information provision.
14.	To reduce contributions to climate change	Consideration of whether policies would result in reductions or increases of greenhouse gas (GHG) emissions such as from transport and new development and to what extent.
15.	To reduce vulnerability to climatic events	Consideration of: <ul style="list-style-type: none"> <li>Whether policies would have positive or negative effects on flood risk.</li> <li>Direct or indirect effects on mitigation against and adaptation to the risk of flooding and other climate change effects, e.g. by using sustainable drainage systems and buildings adaptation (the use of green roofs, the utilisation of natural and artificial ventilation corridors, etc).</li> </ul>
16.	To conserve and enhance biodiversity and geodiversity	Consideration of: <ul style="list-style-type: none"> <li>Whether policies may have a positive or negative effect on internationally and nationally designated sites and locally important habitats and species (either through fragmentation or proximity effects).</li> <li>Whether the policies would result in the conservation, enhancement or creation of habitats (positive effects). Effects of urban development on wildlife networks and corridors were also considered in terms of whether such corridors would be protected or severed.</li> </ul>
17.	To conserve and where appropriate enhance areas of historical and archaeological importance	Consideration of: <ul style="list-style-type: none"> <li>Policies that would have a direct effect on designated Conservation Areas, Scheduled Ancient Monuments, listed buildings, locally listed buildings and their settings.</li> <li>Extent to which there is a sympathetic integration of development on local character would be assessed.</li> <li>Secondary effects would be considered through policies that would reduce the traffic levels in the borough as well as other traffic management measures resulting in positive effects.</li> </ul>
18.	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Consideration of: <ul style="list-style-type: none"> <li>Whether policies would seek directly or indirectly, to maintain and enhance the quality of the landscape, countryside and open space.</li> <li>Whether policies would seek to prevent coalescence of settlements.</li> </ul>
<b>Economic</b>		
19.	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Consideration of: <ul style="list-style-type: none"> <li>Whether policies would support maintaining and extending the range of wealth generating activities, including retail, leisure, recreation and tourism in addition to services, facilities and educational activities.</li> <li>The extent to which policies would require development to be focused in existing urban centres and the expected impact of the policies on the overall quality and attractiveness of the area</li> </ul>



	SA Objective	Assessment Rationale
		would be primary considerations.
20.	To revitalise town centres	Consideration of: <ul style="list-style-type: none"> <li>Whether policies would aim to reduce the number of vacant units and/or add to the diversity and vitality of the town centres.</li> </ul>
21.	To encourage efficient patterns of movement in support of economic growth	Consideration of sustainable development, accompanied by strategies for public transport, community infrastructure and a mix of uses.
22.	To encourage and accommodate both indigenous and inward investment	Consideration of whether policies would support inward investment.

**Table 9.3 – Summary of Significance of Direct Effects of the Preferred Policies**

SA Objective	1	2	3	4	6	7	8	9	10	11	12	13	14	15
1 To improve the health of the population overall and reduce health inequalities	++	++	+	+	0	0	+	0	0	0	+	+	0	+
2 To maintain and improve levels of education and skills in the population overall	++	0	0	0	0	0	0	0	0	0	++	++	0	+
3 To reduce crime and anti-social activity	0	+	0	++	0	+	0	0	0	0	0	0	0	0
4 To reduce poverty and social exclusion	0	+	0	0	++	+	0	+	0	0	+	+	0	0
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	0	0	0	0	0	0	0	++	++	++	+	0	0
7 To meet the housing requirements of the whole community	++	0	0	+	++	+	0	0	0	0	++	++	++	0
8 To improve the quality of where people live and to encourage community participation	+	0	0	++	0	++	0	0	0	0	++	++	0	0
9 To improve water and air quality	--	++	+	0	0	0	0	+/-	0	0	-	-	--	+/-
10 To conserve soil resources and quality	-	++	+	0	0	--	0	+/-	0	0	-	-	-	0
11 To use water and mineral resources efficiently, and re-use and recycle where possible	--	++	0	0	0	0	0	0	0	0	-	-	--	0
12 To reduce waste	--	++	0	0	0	0	0	0	0	0	-	-	--	0
13 To reduce the effects of traffic on the environment	-	+/-	0	0	0	0	+/-	+/-	+	+	-	+/-	-	+
14 To reduce contributions to climate change	--	++	0	0	0	0	+/-	--	+	+	--	-	--	0
15 To reduce vulnerability to climatic events	-	++	0	0	0	0	0	--	0	0	+/-	+/-	-	0
16 To conserve and enhance biodiversity and geodiversity	-	++	+++	0	0	--	0	+/-	0	0	-	-	-	0
17 To conserve and where appropriate enhance areas of historical and archaeological importance	-	++	+	++	0	-	0	+/-	0	0	--	+	-	0
18 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	-	++	+	++	0	-	0	+/-	0	0	-	+	-	0
19 To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	0	0	0	0	0	0	++	++	+	++	+	+	++
20 To revitalise town centres	++	+	0	0	++	0	+	0	++	++	++	+	++	++
21 To encourage efficient patterns of movement in support of economic growth	+	0	0	++	0	0	0	++	0	0	++	0	+	0
22 To encourage and accommodate both indigenous and inward investment	0	0	0	0	0	0	0	++	++	0	++	+	0	0

### **Policy CS1: St Edmundsbury Spatial Strategy and Policy CS5: Settlement Hierarchy and Identity**

- 9.8 These policies were appraised together given their similar aim, which is to set out the spatial location and distribution of residential development in St Edmundsbury to meet the identified housing targets set out in the East of England Plan for the period 2001-2021.
- 9.9 The policies perform well against the social objectives as by providing housing during the plan period, this will ensure that housing needs for the Borough are met. However, the provision of approximately 10,000 homes in St Edmundsbury will inevitably have negative effects on the environment. From this assessment negative effects of varying scale and significance were identified against SA Objectives 9 (water and air quality), 10 (soils resources and quality), 11 (water and mineral resources), 12 (waste), 13 (effects of traffic on the environment), 14 (climate change), 15 (vulnerability to climatic events), 16 (biodiversity), 17 (heritage) and 18 (local landscape and townscape) as the Core Strategy identifies the need for Greenfield development to meet longer term and higher housing targets. This includes the strategic expansion of Bury St Edmunds and Haverhill as well as in rural areas.
- 9.10 The policy states *'the protection of the natural and historic environment, the distinctive character of settlements and the ability to deliver infrastructure will take priority when determining the locations of future development'*. Whilst this provides a generic aim to protect the natural and built environment, this policy could be strengthened by cross referring to Policy CS2: Sustainable Development somewhere in the policy wording which sets out clear, criteria based policy to achieving a high quality sustainable environment.
- 9.11 Positive effects have been identified for the economic objectives as by focusing development in the towns of Bury St Edmunds and Haverhill this sequential approach should ensure positive significant permanent effects in revitalising existing centres and supporting economic growth in the borough.

### **Policy CS2: Sustainable Development**

- 9.12 This policy is the Council's overarching policy for ensuring environmental considerations both for the built and natural environment such as water, climate change, air quality, noise, biodiversity, heritage and design are taken into account in any new development. Policy CS2 provides a strong criterion based approach, which if effectively implemented, would have overall positive effects on all environmental SA objectives. The policy is also expected to benefit a number of the SA social objectives (1 – Health; 3 – Crime; 4 – Social exclusion; 5 – Access to key services) and economic objective (20 – Town centres), as it aims to provide infrastructure and services, contribute to the vitality of the area and create a safe environment.
- 9.13 It is recommended that the policy supporting text clearly establishes the link between the measures set out in Policy CS2 and the need to respond to climate change. This would help demonstrate how the Core Strategy provides the framework for reducing the area's carbon footprint and making it resilient to the climate change consequences in accordance with Supplement to Planning Policy Statement 1 (*Planning and Climate Change*).

### **Policy CS3: Natural and Built Environment**

- 9.14 The appraisal of this policy results in similar positive effects on the environmental SA objectives as CS2. It is suggested that this policy is combined with Policy CS2 as the aims of both policies are comparable. However, if this policy remains as a separate policy in the Core Strategy, the following recommendations should be made:
- Suggest including reference to the protection and enhancement of the built environment in the policy wording itself and its supporting text to strengthen the policy and to achieve more significant positive effects for this objective.
  - Suggest including reference to the protection and enhancement of landscapes in the policy wording itself to strengthen the policy and to achieve more significant positive effects for this objective.

#### Policy CS4: Design and Local Distinctiveness

- 9.15 The remit for this policy is that proposals for new development must create and contribute to a high quality, sustainable environment. This is similar to the aims of Policies CS1 and CS2 and this policy seems to combine a number of CS policies CS2, CS3, CS8. In addition, it is considered that this policy and the measures outlined to promote secure attractive, safe and people-friendly streets are too detailed for inclusion in the Core Strategy and would sit better in the Development Management DPD.
- 9.16 From this assessment positive effects of varying scale and significance were identified against all the SA environmental objectives. Positive effects are also expected against a number of the SA social objectives (1 - *Health of population*; 3 - *Crime*; 5 – *Access to services*; 7 – *Housing requirements*; 8 – *Quality of life*) and SA economic objective 21 (*Efficient patterns of movement*), as it stipulates the provision of open space, leisure, cultural facilities and mix of housing and promotes the use of sustainable transport modes through infrastructure improvements and traffic management schemes.

#### Policy CS6: Affordable Housing

- 9.17 This policy has been identified as having positive significant effects against three of the SA social objectives. The significantly positive effects related to affordable housing provision helping to tackle poverty and social exclusion (SA Objective 4), providing affordable housing in accessible locations (SA Objective 5) and providing sufficient housing that is affordable (SA Objective 7). The policy allows the LPA to ensure that affordable housing provision is directed to locations that offer the greatest accessibility to education, employment, recreation, countryside health, community services and cultural facilities for a wider proportion of the population, particularly those without access to a car as greatest proportion of affordable housing will be provided in Bury St Edmunds and Haverhill. The policy is also expected to benefit SA economic objective 20 (*Revitalise town centres*) by supporting the viability of the population through enabling local people to afford to buy houses in the area.

#### Policy CS7: Gypsies and Travellers Accommodation

- 9.18 This policy is assessed as having overall positive effects against the social SA objectives. By accommodating the gypsy and traveller population as opposed to excluding them should have positive effects on reducing social exclusion (SA Objective 4). St Edmundsbury is required to provide up to 20 pitches for gypsies and travellers by 2012 (there were only two authorised pitches in 2006). Therefore, this provision should meet the requirements of the gypsy and traveller community, having significant positive effects on SA Objective 6 (*Quality of life*).
- 9.19 The provision of additional 18 pitches for gypsies and travellers will be permitted in the countryside through this policy which is predicted to have negative effects of varying scale on the majority of the environmental objectives. The current policy wording for protecting the environment is limited to: *'the use of the site would not have an adverse impact upon the amenities of nearby occupiers'*, *'the proposal would not detract from the undeveloped open and rural character and appearance of the countryside'* and *'adequate landscaping measures are included'*. The inclusion of these criteria in the policy wording minimises negative effects for the landscape SA objective however; there are no equivalent criteria seeking the protection of other environmental resources such as water, solids, air, biodiversity and heritage.
- 9.20 To minimise potential negative effects it is recommended that the policy is cross-referenced to Policy CS2 as follows:  
*'In the countryside, proposals for gypsy and traveller show people will be permitted in accordance with the criteria outlined in Policy CS2.....'*
- 9.21 It is also suggested that a criteria-based policy for selecting suitable sites based on criteria outlined in CS2 should be developed and included in the relevant policy in the Development Management DPD to ensure sites are considered against biodiversity, landscape and heritage designations, soil quality, flood risk etc. Suggested additional criteria include:

- *a sequential site selection process with an emphasis on land which has been previously developed;*
- *safe and convenient access to the primary road network with proximity to the major road network and without blocking any existing rights of way ;*
- *safe and acceptable environmental conditions within the site including the need to avoid air and noise pollution and significantly contaminated land;*
- *an ability to receive essential services including water, sewerage, drainage and water disposal;*
- *location within reasonable proximity to key local services;*
- *the potential risk of flooding or the ability to mitigate this risk; and*
- *ensuring that any other adverse effects on the built and natural environment are avoided and / or mitigated including compliance with the key environmental policies set out in the Core Strategy (including Policies CS2 and CS4).*

9.22 Policy CS7 can then also refer to the policy on Gypsy and Travellers Accommodation in the Development Management DPD that sets out more detailed sites selection criteria.

#### **Policy CS8: Sustainable Transport**

9.23 This policy sets out a hierarchy for sustainable transport with non-motorised user provision as a priority. This policy requires that all development proposals will be accessible to people of all abilities, including those mobility impaired, which should result in permanent positive and significant effects on SA Objective 5 (*Access to key services for all*). This policy was also assessed as having positive but not significant effects on SA Objective 20 (*Vitality of town centres*). The promotion of alternatives to the car is likely to have indirect positive effects on the viability and vitality of town centres by making town centres more accessible to a wider cross-section of the population.

9.24 This policy is assessed as having a mix of positive and negative effects for SA Objective 13 (*Traffic effects*). Whilst this policy, through promoting non-motorised users and travel plans, contributes to reducing car emissions and effects of traffic on the environment resulting in positive effects, new development will inevitably increase traffic volumes, as the number of households increases, given the prevailing cultural and societal norms. Therefore, a mixture of positive and negative effects on the environment is likely when assessed together.

#### **Policy CS9: Strategic Transport Improvements**

9.25 By virtue of the nature and content of the strategic transport improvements outlined in this policy which vary from improvements to rail and public transport, to road infrastructure proposals such as the improvements of Junctions 42 and 44 of the A14 adjacent to Bury St Edmunds, the assessment of this policy has resulted in a contradictory mixture of positive and negative effects of varying degrees of significance on the environmental SA objectives.

9.26 Overall, positive effects are predicted for SA Objective 5 (*Access to services*), as improvements to all transport network modes should have significant long term positive effects on improving accessibility to key services, particularly in the towns of Bury St. Edmunds and Haverhill. Overall positive effects are predicted for the SA economic objectives 19, 20, 21 and 22 (*Sustainable levels of prosperity; Revitalise town centres; Efficient patterns of movement; Indigenous and inward investment*), as improvements to all transport network modes should have significant long term positive effects on strengthening the economy.

#### **CS10: Employment and the Local Economy**

9.27 Positive significant effects are predicted for the SA social objectives 4 and 5 (*Poverty and social exclusion; Access to services*). By concentrating employment in the towns of Bury St. Edmunds and Haverhill and in existing general employment areas in or near key service centres or local service centres will improve accessibility as well as ensuring readily available opportunities for

employment. This policy is assessed as having significant positive effects on the economic objectives.

- 9.28 The current policy wording offers no protection of the environment, in particular in relation to new employment sites and is currently reactive rather than proactive in its protection of the environment. Whilst any development proposal would be assessed against the criteria outlined in Policy CS2: Sustainable Development, it is recommended that this policy cross refers to Policy CS2. This policy is assessed as having a range of not significant positive and negative effects on a number of environmental objectives due to the potential negative effects of new employment development on the environment.

#### **Policy CS11 Retail, Leisure and Office Development**

- 9.29 If the aim of the policy is to encourage cultural facilities alongside retail and leisure opportunities, it is recommended that the title of the policy be changed to encompass a broader spectrum i.e. *Retail, Leisure and Cultural Provision*. It is also recommended to remove 'office development' from the policy title as the principal aim of the policy seems to relate to retail and leisure and the vitality and viability of town centres.
- 9.30 Significant positive effects are predicted for SA Objective 5 (*Access to services*), as concentrating retail in the towns of Bury St Edmunds and Haverhill should result in significant positive effects in improving access to retail and leisure facilities. It will ensure that shopping facilities are accessible by a range of modes particularly with the effective implementation of the sustainable transport hierarchy. Positive but not significant effects are predicted for SA objective 14 (*Contributions to climate change*) through the reduction in car use and the need to travel due to promotion of retail and leisure facilities in accessible locations, resulting in the reduction of greenhouse gas emissions in the long term.
- 9.31 Significant positive effects are predicted for SA economic objective 20 (*Revitalise town centres*), as this is the key aim of the policy.

#### **Policy CS12: Bury St Edmunds Strategic Growth**

- 9.32 The strategy for Bury St Edmunds stems from CS Policy 1: Spatial Strategy for St Edmundsbury which identifies this historic market town as a key focus for sustainable growth. This policy identifies five broad areas for development around the town, which correspond with five of the six strategic sites proposed. This assessment has appraised the strategic growth of Bury St Edmunds and should be read in conjunction with the detailed appraisals for the six strategic sites.
- 9.33 Overall positive significant effects are predicted for the social SA Objectives 2 (*Education and skills*), 5 (*Improving accessibility*), 6 (*Employment*) and 7 (*Housing*) and minor positive effects are expected for SA objective 4 (*Social exclusion*). Positive significant long term effects are also predicted for SA economic objectives 19, 20, 21 and 22 (*Sustainable levels of prosperity; Revitalise town centres; Efficient patterns of movement; Indigenous and inward investment*), as the strategic economic growth of Bury St Edmunds is the overarching aim of this policy. With regard to the SA environmental objectives, a mix of positive and negative effects of varying degrees of significance is predicted which is inevitable given that this policy promotes new development. Potential effects identified in the detailed assessment of the strategic sites need to be carefully addressed through appropriate mitigation measures.
- 9.34 Strategic sites in and around Bury St Edmunds have been subject to more detailed appraisal (see Section 9).

#### **Policy CS13: Haverhill Strategic Growth**

- 9.35 This policy relates to the expansion of Haverhill on land on the north-eastern edge of the town to accommodate future long term strategic growth for the town. All predicted effects therefore would occur in the longer term.
- 9.36 Positive significant effects are predicted against SA Objective 2 (*Education and skills*) as this policy stipulates the provision of education facilities which is likely to have positive effects. The effects will be local as any educational facility would serve the local population. Positive



significant effects are also predicted for social objectives SA Objective 5 (*Improving accessibility*) due to the potential for a North-eastern relief road, providing additional facilities in an already accessible areas and improved local connections to the existing built up areas and rights of way network. Positive significant effects are also predicted for SA Objective 7 (*Housing requirements*) through the provision of 2,200 homes, which will contribute to meeting the housing requirements of the borough. As a proportion of this housing will be affordable, minor positive effects are also expected for SA Objective 4 (*Social exclusion*).

9.37 Positive significant long term effects are predicted for SA economic objectives 19, 20, 21 and 22 (*Sustainable levels of prosperity; Revitalise town centres; Efficient patterns of movement; Indigenous and inward investment*), as the strategic economic growth of Haverhill is the overarching aim of this policy.

9.38 With regard to the environmental objectives, a mix of positive and negative effects of varying degrees of significance is predicted which is inevitable given that this policy promotes new development. Significant negative effects are predicted in the long term for SA Objective 10 (*Soil resources*) and SA Objective 16 (*Biodiversity*) due to greenfield expansion. Significant negative effects are also predicted for SA Objectives 9 (*Water and air quality*), 12 (*Waste*), 13 (*Effects of traffic*), 14 (*Contributions to climate change*) and 15 (*Vulnerability to climatic events*) due to the inevitable increases in population and traffic as a result of new development. Positive effects are predicted against SA Objectives 17 (*Heritage*) and 18 (*Landscape*), as the policy includes the following two criteria: *'protection so that the ridge and the visual boundary with Kedington is not breached'* and *'protection for the Scheduled Ancient Monument at Wilsey Farm'*.

9.39 It is recommended that additional criterion is added to this policy to ensure the protection of the wider natural environment to include biodiversity. Although effective implementation of Policy CS2: Sustainable Development, should help in minimising negative effects, it is recommended to that this policy is cross-referenced to Policy CS2 or an additional criterion should be added as follows:

*'ensure that any adverse effects on the built and natural environment are avoided, mitigated and/or compensated'*

*'Land on the north-eastern edge of Haverhill will accommodate the future long term strategic growth for the town, subject to other relevant policies in particular CS2, and will provide....'*

9.40 The strategic expansion of Haverhill will, if CS4 is implemented effectively, be subject to a master plan, planning application and detailed environmental impact assessment, which should ensure that proposals respect the natural and built environment, where possible and that negative effects are mitigated.

9.41 Strategic sites in and around Haverhill have been subject to more detailed appraisal (see Section 9).

#### **Policy CS14: Phasing**

9.42 It is recommended that the title of this policy is re-worded to read *'Sequential approach to sites development'*, as the policy text refers to sequential approach in re-using previously developed land with housing settlement boundaries ahead of releasing greenfield sites for new neighbourhoods. The identification and prediction of effects are similar to those for Policies CS1 and CS5, establishing a spatial location and distribution of housing, in terms of effects of new development.

9.43 At present the wording of the policy offers no protection on the environment. Whilst any development proposal would be assessed against the criteria outlined in Policy CS2: Sustainable Development, it is recommended that this policy cross refers to Policy CS2.

#### **Policy CS15: Infrastructure**

9.44 This policy is assessed primarily as having effects against the majority of the social objectives. Positive effects are achieved against SA Objectives 1, 2 and 5 (*Health of the population;*

*Education and skills; Access to key services*). However, this policy does not stipulate the type of community facilities which will be supported through this policy (only in the supporting text). The positive effects may be greater if the specific community facilities are referred to in the policy wording. The assessment against the environmental SA objectives has resulted in a mix of effects.

- 9.45 The provision of infrastructure through developer contributions may generate sufficient funding to enhance sustainable transport options in combination with Policy CS8 resulting in positive effects on SA Objective 13 (*Effects of traffic*).
- 9.46 The scale and effects of this policy is likely to be monitored through the development control process. The uncertainty of all effects predicted is high as they will depend on the nature of obligations sought for development proposals.
- 9.47 It is suggested that this policy is titled as 'community *infrastructure capacity and tariffs*' as the principal aim of this policy appears to relate to community infrastructure provision to be achieved through developer contributions.

## Cumulative, Synergistic and Indirect Effects

- 9.48 The detailed assessment, the results of which are presented in Appendix D, was focused primarily on direct effects. As required by the SEA Regulations, cumulative, synergistic and indirect effects have also been recorded and analysed during the appraisal. Table 9.4 lists the results of this analysis.

**Table 9.4 – Summary of Cumulative, Synergistic and Indirect Effects**

Policies	Effects	Causes	Significance
CS1, CS2, CS3, CS4, CS5, CS8, CS12, CS13, CS15	Cumulative and synergistic effects on improving the health of St Edmundsbury's resident population	Taken together, these policies all seek to address aspects that contribute to improving health, encompassing high quality housing; improvement in walking and cycling provision as well as an improvement in sports and recreational facilities and access to them; and improvement of the natural environment and transport that may improve air quality and a sense of wellbeing.	Significant positive effects increasingly apparent over the medium to longer term.
CS1, CS5, CS12, CS13	Indirect effects on improving levels of education and skills	The spatial hierarchy and policies for strategic growth in Haverhill and Bury St Edmunds should help to improving overall education and skill level for the local population.	Indirect positive effects likely over the longer terms as development proposals and infrastructure is completed.
CS2, CS6, CS7, CS8	Indirect effect on tackling poverty and social exclusion	A number of the policies may, when taken together, help to reduce poverty and social exclusion in St Edmundsbury. These factors include: improving the quality of housing and development as well as affordability, improving skills levels and access to community facilities, education and employment, and improving health levels.	Indirect positive effects likely over the longer term as development proposals and infrastructure completed, providing this is done in an equitable way across the plan area.
All CS Policies	Cumulative effects on improving accessibility to services and facilities	The cumulative effect of policies concerned with the locational approach, focusing the greatest concentrations of development within central and accessible locations, should result in an overall reduction in the need for residents and workers to travel to access essential services and facilities.	Significant positive effects developing over the medium and longer term as more development opportunities are realised.
CS1, CS5, CS6, CS7, CS12, CS13	Cumulative effects of meeting the housing requirements of St Edmundsbury	These policies cumulatively will meet the housing requirement for Bury St Edmunds.	Significant positive effects developing over the medium and longer term as more development



Policies	Effects	Causes	Significance
			opportunities are realised.
All	Cumulative effects on air quality	An increase in development and road infrastructure may lead to a net increase in overall traffic volume, despite efforts to create a modal shift, and thus lead to the deterioration of air quality.	Significant negative effects developing over the medium to longer term as more development occurs.
CS1, CS9, CS12, CS13	Cumulative effects on contributing to climate change and vulnerability of climatic events	GHG emissions arise from a wide variety of sources including transport, construction, waste transfer and the general operation of buildings (heating and lighting systems). As such, the cumulative effects of realising the scale of development set out in these policies is likely to result in an overall increase in GHG emissions across the plan area, irrespective of the potential effects of other policy provisions. The focus of growth around the airport will likely exacerbate these effects.	Significant and permanent negative effects, becoming increasingly apparent over the medium and longer term.
CS1, CS2, CS8, CS9, CS10, CS11, CS12, CS13	Cumulative and synergistic effects on reducing the effects of traffic on the environment	The cumulative and synergistic effects of policies concerned with the locational approach of focusing the greatest concentrations of development with main population centres; and the promotion of a combination of physical and incentive based measures aimed at encouraging the use of public transport on encouraging modal shift to non-car modes, particularly for short distance and commuting trips.	Significant positive effects developing over the medium to longer term as more development opportunities and infrastructure proposals are completed.
CS1, CS2, CS9, CS10, CS11, CS12, CS13, CS14, CS15	Indirect effects of strengthening the local economy in St Edmundsbury	The spatial hierarchy and policies for strategic growth in Haverhill and Bury St Edmunds should help to strengthen the economy.	Indirect positive effects likely over the longer term.

9.49 The assessment therefore highlights the need for those elements that are expected to result in adverse effects to be addressed more overtly as part of the DPD process, supported by mitigation as appropriate, as well as enhancement of beneficial effects where possible.

## 10. Assessment of 2010 Revised Policies

- 10.1 This section assesses changes to the Core Strategy following the Inspector's Report dated 24<sup>th</sup> August 2010. The Inspector concluded that a few changes were required in order for the Core Strategy to be sound. These changes are relatively minor and do not materially alter the substance of the overall plan and its policies. For this reason, the original Sustainability Appraisal has not been undermined and is still generally valid. However, where there have been changes to the policies, the original sustainability assessment has been updated as necessary.

### Evolving Policy Context

- 10.2 Since the previous assessment was undertaken (section 9), a number of new Planning Policy Statements have been published, providing a changing context to the Core Strategy that may have an influence on the SA:
- PPS 3: Housing (published June 2010)
  - PPS 4: Planning for Sustainable Economic Growth (published December 2009)
  - PPS 5: Planning for the Historic Environment (published March 2010)
  - PPS 25: Development and Flood Risk (published March 2010)

### Identification of key changes to the Core Strategy Policies

- 10.3 Table 10.1 illustrates the changes to the Core Strategy policies when compared with the submission document. The comments column provides an appreciation of these changes from a sustainability perspective and whether an updated assessment is required.
- 10.4 Note that policy numbers have changed from the original assessments undertaken in Section 9. Since these assessments were undertaken, Policy CS14 on sequential approach to development of sites has been deleted and Policy CS3 on Natural and Built Environment has been combined with Policy CS2 on Sustainable Development (some of these changes were made prior to submission but after the assessment reported in Section 9). The policy numbers from the assessments in Section 9 are shown in brackets below next to the updated policy number for ease of reference.
- 10.5 Updated assessments are therefore required for the following policies and are presented in this section:
- **CS1** (CS1) - St Edmundsbury Spatial Strategy (note that this assessment is combined with that of CS4 – Settlement Hierarchy and Identity)
  - **CS2** (CS2) - Sustainable Development
  - **CS5** (CS6) - Affordable Housing
  - **CS6** (CS7) - Gypsies, Travellers and Travelling Showpeople
  - **CS8** (CS9) - Strategic Transport Improvements
- 10.6 The original assessments for the following policies remain valid and have therefore not been updated (see section 9. for assessment results):
- **CS3** (CS4) - Design and Local Distinctiveness
  - **CS4** (CS5) - Settlement Hierarchy and Identity
  - **CS7**(CS8) - Sustainable Transport
  - **CS9** (CS10)- Employment and the Local Economy
  - **CS10** (CS11) - Retail, Leisure, Cultural and Office Provision

- **CS11** (CS12) - Bury St Edmunds Strategic Growth
- **CS12** (CS13) - Haverhill Strategic Growth
- **CS13** - Rural Areas
- **CS14** (CS15) - Community infrastructure capacity and tariffs
- **CS15** (CS16) - Plan, Monitor, Manage

10.7 Policy CS14 on the Sequential approach to development of sites (previously CS14 on phasing) has now been deleted to allow consistency between policies. Policies CS1 (St Edmundsbury Spatial Strategy), CS11 (Bury St Edmunds Strategic Growth) and CS12 (Haverhill Strategic Growth) have been updated to incorporate reference to the Sequential Approach. The original SA assessment for CS14 (Sequential approach) is now obsolete.

Table 10.1 — Revised Core Strategy Policies (post Inspector's Report of 24<sup>th</sup> August 2010)

Revised Policy Reference and Title (10 <sup>th</sup> August 2010)	Revised Policy Text (post Inspector's Report of 24th August 2010) (New text shown <u>as underlined</u> . Deleted text shown as <del>striked through</del> ).	Comments
CS1: St Edmundsbury Spatial Strategy	<p>The spatial strategy provides a framework for environmentally sustainable economic growth within the overall guidelines of the East of England Plan and the context of the Western Suffolk Sustainable Community Strategy. The Key Diagram illustrates the Council's vision for the management of growth in the borough for the period to 2031. The protection of the natural and historic environment, the distinctive character of settlements and the ability to deliver infrastructure will take priority when determining the location of future development.</p> <p>Opportunities to use previously developed land and buildings for new development will be maximised through a sequential approach to the <del>location of development</del> <u>identification of development locations</u> in settlements. <del>The development of previously developed sites will be balanced with the need to release further greenfield land for development in the context of the delivery of the spatial targets.</del> The towns of Bury St Edmunds and Haverhill will be the main focus for the location of new development, supported by appropriate levels of development in Key Service Centres, Local Service Centres and Infill Villages. In particular, longer term strategic growth will be provided to the south-east and north-east of Bury St Edmunds and the north-west and north-east of Haverhill. Lesser, mixed use development will take place on the eastern, north-western and western edges of Bury St Edmunds.</p> <p>All growth around Bury St Edmunds and Haverhill will protect the identity of those villages that surround the towns and strategic landscaped buffers will be identified and where necessary provided to ensure that the settlements do not become part of the larger urban area. Precise boundaries to determine the extent of the built up area of the towns will be defined in preparing the Area Action Plans for Bury St Edmunds and Haverhill.</p> <p>Provision is made for a commensurate proportion of the 18,000 new jobs allocated in the East of England Plan for the Rest of Suffolk and the same Plan's requirement for at least 15,400 new homes (net) between 2001 and 2031.</p> <p>The table below sets out the components of the new housing provision and its proposed distribution across the borough.</p> <p>All new allocations are minimum numbers.</p>	<p>Policy CS1 sets out the overall Spatial Strategy for St. Edmundsbury.</p> <p>It has been updated to remove inconsistencies of the original Core Strategy regarding the sequential approach. Policy CS14 has been deleted and policy CS1 adapted to include the need for balancing the development of previously developed sites with the release of further greenfield land for development in the context of the delivery of the spatial targets.</p> <p>Allocations (shown in the table of the policy) have also been updated and there has been some clarification of the wording on the table's notes.</p> <p>These are substantial changes to the policy and have therefore been reassessed through the Sustainability Appraisal</p>

Revised Policy Reference and Title (10 <sup>th</sup> August 2010)		Revised Policy Text (post Inspector's Report of 24th August 2010) (New text shown <u>as underlined</u> . Deleted text shown as <del>striked through</del> ).								Comments	
		Town/Settlement category	Already built 2001-2008	Currently permitted (April 2008)	Remaining Local Plan allocations Rolled forward	Strategic directions of growth	Other potential*	Rural Windfall	Total	Percentage	process.
Bury St Edmunds			<del>1600</del> <u>1759</u>	<del>672</del> <u>818</u>	441	4350	750		<del>7813</del> <u>8118</u>	<del>50</del> <u>52</u>	
Haverhill			<del>930</del> <u>1037</u>	<del>373</del> <u>291</u>	1273	2500	<del>240</del> <u>200</u>		<del>5316</del> <u>5301</u>	34	
Rural Area	Key Service Centres		<del>507</del> <u>592</u>	<del>317</del> <u>245</u>	240		<del>610</del> <u>565</u>	<del>575</del> <u>325</u>	<del>2464</del> <u>2212</u>	<del>16</del> <u>14</u>	
	Local Service Centres				35		<del>170</del> <u>200</u>				
	Other Villages						10				
Totals			<del>3037</del> 3388	<del>1362</del> 1354	1989	6850	<del>1780</del> <u>1725</u>	<del>575</del> <u>325</u>	<del>15593</del> <u>15631</u>		
*The Figures in this column the "Other Potential" column are rounded and include:											

Revised Policy Reference and Title (10 <sup>th</sup> August 2010)	Revised Policy Text (post Inspector's Report of 24th August 2010) (New text shown <u>as underlined</u> . Deleted text shown as <del>striked through</del> ).	Comments
	<ul style="list-style-type: none"> <li>• large sites that have gained planning consent since 1 April 2008;</li> <li>• <u>sites with approved development briefs or masterplans (including North West Haverhill; or</u> <del>are included in approved development briefs or masterplans; or</del></li> <li>• are identified in the Strategic Housing Land Availability Assessment (SHLAA).</li> </ul> <p>Area Action Plans for Bury St Edmunds and Haverhill and a Site Allocations Development Plan Document for the rural area will identify the location and precise boundaries of future development land.</p>	
Policy CS2 - Sustainable Development	<p>A high quality, sustainable environment will be achieved by designing and incorporating measures appropriate to the nature and scale of development, including:</p> <p><u>The protection and enhancement of natural resources:</u></p> <p>A) making the most resource efficient use of land and infrastructure;</p> <p>B) protecting and enhancing biodiversity, wildlife and geodiversity, and avoiding impact on areas of nature conservation interest in both rural and built up areas</p> <p><del>C) safeguarding and enhancing wildlife corridors and ecological networks</del></p> <p><u>E) identifying, protecting and conserving: a network of designated sites including the Breckland Special Protection Area (SPA)*; protected habitats and species (BAPS); and other sites of national and local importance; Biodiversity Action Plan (BAP) habitat and species; wildlife or green corridors; and ecological networks; and other green spaces will be identified, protected and habitats created as appropriate;</u></p> <p>D) conserving and, wherever possible, enhancing the character and quality of local landscapes and the wider countryside and public access to them, in a way that recognises and protects the fragility of these resources;</p> <p><del>F) conserving and, wherever possible, enhancing other natural resources including, air quality and the quality and local distinctiveness of soils;</del></p> <p><del>G) protecting the quality and availability of water resources;</del></p>	<p>Policy CS2 on Sustainable Development has been updated to remove a specific point related to ecological networks and protection of ecological networks has been included in a latter point. There is reference to other sites of national and local importance as well as the Breckland SPA. A further buffer zone has been included around the SPA to provide additional protection.</p> <p>In terms of sustainable design the policy has been amended so that requirements do not</p>

Revised Policy Reference and Title (10 <sup>th</sup> August 2010)	Revised Policy Text (post Inspector's Report of 24th August 2010) (New text shown <u>as underlined</u> . Deleted text shown as <del>striked through</del> ).	Comments
	<p><del>HG</del>) maximising the efficient use of water including recycling of used water and rain water harvesting;</p> <p><del>H</del>) maximising the potential of existing and new sources of energy from biomass including timber and other energy crops; and</p> <p><u>Sustainable design of the built environment:</u></p> <p><del>H</del>) providing the infrastructure and services necessary to serve the development;</p> <p><del>K</del>) incorporating the principles of sustainable design and construction in accordance with recognised appropriate national standards and codes of practice to cover the following themes:-</p> <ul style="list-style-type: none"> <li>• Energy and CO<sub>2</sub> Emissions – seeking, <u>where feasible and viable</u>, carbon neutral development, <del>and low carbon sources</del> and decentralised energy generation;</li> <li>• Water – ensuring water efficiency by managing water demand and using such waste water reuse methods as rainwater harvesting and grey water recycling;</li> <li>• Materials - minimising the use of resources and making use of local materials;</li> <li>• Surface Water Run-off – incorporating flood prevention and risk management measures, such as sustainable urban drainage;</li> <li>• Waste – adhering to the waste hierarchy during construction and following development to prevent waste generation and ensure reuse, recovery and recycling;</li> <li>• Pollution – remedying existing pollution or contamination and preventing further pollution arising from development proposals;</li> <li>• Transport – minimising the need for travel and ensuring a balance between transport infrastructure and pedestrians;</li> <li>• Health and Wellbeing – ensuring that the development enhances the quality of</li> </ul>	<p>exceed national targets that would be contrary to PPS1 Supplement. The policy wording has been amended to reflect this with the insertion of “where feasible and viable” for carbon neutral development. It now also includes “where appropriate” in relation to site specific targets. The supporting text to this policy has also been amended so that the sentence “The Council’s expectation is that qualifying development should achieve as a minimum a Code Level 4” in reference to the Code for Sustainable Homes and the sentence “for commercial schemes, the Council will expect smaller non-residential developments to achieve at least a BREEAM ‘very good’ rating. The Council will expect larger schemes (in excess of 1,000 square metres net</p>

Revised Policy Reference and Title (10 <sup>th</sup> August 2010)	Revised Policy Text (post Inspector's Report of 24th August 2010) (New text shown <u>as underlined</u> . Deleted text shown as <del>striked through</del> ).	Comments
	<p>life of future occupants and users;</p> <ul style="list-style-type: none"> <li>Ecology – valuing and enhancing the ecological features of the development site, where appropriate.</li> </ul> <p><del>LK</del>) ensuring that developments and their occupants are capable of managing the impact of heat stress and other extreme weather events;</p> <p><del>ML</del>) making a positive contribution towards the vitality of the area through an appropriate mix of uses. In areas of strategic growth this will include employment, community, <u>retail</u>, social, health and recreation facilities (including the protection and provision of informal and formal recreation, parks, open spaces and allotments);</p> <p><del>NM</del>) creating a safe environment which enhances the quality of the public realm;</p> <p><del>ON</del>) making a positive contribution to local distinctiveness, character, townscape and the setting of settlements;</p> <p><del>PO</del>) <del>wherever possible</del>, conserving or enhancing the historic environment including archaeological resources.</p> <p><u>Where appropriate</u>, site specific and area targets, along with detail of viability, to meet national standards and codes, will be set out in the <u>Development Management document</u>, Area Action Plans and the Rural Site Allocations document</p> <p>* Only development that will not adversely affect the integrity of the SPA will be permitted. In applying this policy a buffer zone has been defined that extends 1,500m from the edge of those parts of the SPA that support or are capable of supporting stone curlews, within which:-</p> <p>a) Permission may be granted for the re-use of existing buildings and for development which will be completely masked from the SPA by existing development; alternatively</p> <p>b) Permission may be granted for other development not mentioned in sub paragraph (a) provided it is demonstrated by an appropriate assessment that the development will not adversely affect the integrity of the SPA.</p> <p><u>A further 1500m buffer zone has been defined which extends around those areas (shown on the Proposals Map) outside of the SPA which have supported 5 or more nesting attempts by stone curlew since 1995 and as such act as supporting stone curlew habitat, within which permission</u></p>	<p>floorspace) to achieve the higher BREEAM 'excellent' rating" have both been deleted. This has been replaced with "...the Council will adhere to national codes and targets for Code for Sustainable Homes, BREEAM and Building for Life, which, as stated in Policy CS2, will be set out in lower tier Development Plan Documents to be backed up by viability details".</p> <p>These are substantial changes to the policy and have therefore been reassessed through the Sustainability Appraisal process.</p>



Revised Policy Reference and Title (10 <sup>th</sup> August 2010)	Revised Policy Text (post Inspector's Report of 24th August 2010) (New text shown <u>as underlined</u> . Deleted text shown as <del>striked through</del> ).	Comments
	<p><u>may be granted in accordance with a) and b) above. Additionally within this zone, where it can be shown that proposals to mitigate the effects of development would avoid or overcome an adverse impact on the integrity of the SPA or qualifying features, planning permission may be granted provided the Local Planning Authority is satisfied that those proposals will be implemented. In these areas development may also be acceptable providing alternative land outside the SPA can be secured to mitigate any potential effects.</u></p> <p><u>Development at Risby (which lies partly within the 1500m stone-curlew buffer) will be possible if it is fully screened from the Breckland SPA by existing development. A project level appropriate assessment should be undertaken to ensure no adverse affect upon the integrity of the SPA.</u></p> <p><u>A 400m buffer zone has been defined around those parts of the SPA that support or are capable of supporting nightjar and woodlark. Any development proposal within this zone will need to clearly demonstrate that it will not adversely affect the integrity of the SPA.</u></p>	
Policy CS3 - Design and Local Distinctiveness	<p>Proposals for new development must create and contribute to a high quality, <u>safe and</u> sustainable environment.</p> <p>Proposals will be expected to address, as appropriate, the following components:</p> <ul style="list-style-type: none"> <li>• detailed heritage and conservation design appraisals and information;</li> <li>• consideration of protection of the landscape and historic views;</li> <li>• an understanding of the local context and an indication of how the proposal will enhance the area <u>and improve community safety</u>;</li> <li>• protection of the natural <u>and historic</u> environment;</li> <li>• in proposals for housing, the density and mix of housing;</li> <li>• provision or enhancement of open space, play, leisure and cultural facilities;</li> <li>• access and transport considerations.</li> </ul> <p>Concept Statements/Development Briefs and Masterplans will be required for sites which by virtue of size, location or proposed mix of uses are determined by the local planning authority to</p>	<p>This policy has been updated to include reference to new proposals contributing to a safe environment.</p> <p>A reference to protection of the historic environment has also been included.</p> <p>The policy now states that Concept Statements are a 'component' rather than a 'prerequisite' and that they may be included in Area Action Plans.</p> <p>None of these changes are material changes to the policy and therefore</p>

Revised Policy Reference and Title (10 <sup>th</sup> August 2010)	Revised Policy Text (post Inspector's Report of 24th August 2010) (New text shown <u>as underlined</u> . Deleted text shown as <del>striked through</del> ).	Comments																						
	<p>require a masterplanning approach. A landscape/townscape character appraisal will be an essential prerequisite <u>component</u> for Concept Statements, Development Briefs and MasterPlans. Area Action Plans and Site Allocations DPDs will define those sites where this approach is required. <u>In some cases the content required for Concept Statements will be included in Area Action Plans.</u></p> <p>In Bury St Edmunds and Haverhill improvements to the environment of streets and spaces to secure attractive, safe and people-friendly town centres will be a priority. Proposals for new development in the towns will be required to contribute to improving the public realm. The Area Action Plans and the Development Management DPD will include specific schemes and policies to support this.</p>	the original assessment is still valid.																						
Policy CS4 - Settlement Hierarchy and Identity	<p>All proposals for new development will be expected to have regard to the position of the site within the settlement hierarchy as follows;</p> <table><tr><th colspan="2">Towns</th></tr><tr><td>Bury St Edmunds</td><td>Haverhill</td></tr><tr><th colspan="2">Key Service Centres</th></tr><tr><td>Barrow</td><td>Clare</td></tr><tr><td>Ixworth</td><td>Kedington</td></tr><tr><td>Stanton</td><td><del>Wickhambrook</del></td></tr><tr><th colspan="2">Local Service Centres</th></tr><tr><td>Bardwell</td><td>Barningham</td></tr><tr><td>Cavendish</td><td>Chedburgh</td></tr><tr><td>Great Barton</td><td>Great &amp; Little Thurlow</td></tr><tr><td>Great &amp; Little Whelnetham</td><td>Hopton</td></tr></table>	Towns		Bury St Edmunds	Haverhill	Key Service Centres		Barrow	Clare	Ixworth	Kedington	Stanton	<del>Wickhambrook</del>	Local Service Centres		Bardwell	Barningham	Cavendish	Chedburgh	Great Barton	Great & Little Thurlow	Great & Little Whelnetham	Hopton	<p>This policy has been updated to reflect that Wickhambrook is a 'Local Service Centre' rather than a 'Key Service Centre'.</p> <p>There is also a minor wording change to consider the 'setting' of a settlement when considering new development.</p> <p>None of these changes are material changes to the policy and therefore the original assessment is still valid. However, as the original assessment of this policy was combined with CS1, the assessment has been updated.</p>
Towns																								
Bury St Edmunds	Haverhill																							
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Barrow	Clare																							
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		Hundon	Ingham	
		Risby	Rougham	
		<u>Wickhambrook</u>		
	<b>Infill Villages</b>			
		Chevington	Coney Weston	
		Cowlinge	Fornham All Saints	
		Fornham St Martin	Great Bradley	
		Hawkedon	Hepworth	
		Honington & Sapiston	RAF Honington	
		Horringer	Lidgate	
		Market Weston	Ousden	
		Pakenham	Rede	
		Stanningfield	Stansfield	
		Stoke by Clare	Stradishall	
		Thelnetham	Troston	
		Whepstead	Withersfield	
	<b>Countryside</b>			
	All other settlements not identified in the list above and where a housing settlement boundary is not identified on the Proposals Map.			

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	<p>Careful consideration will be given to maintaining the identity, character and historical context of settlements, to ensure new development does not detract from the environmental quality, townscape, <del>and</del> functional vitality <u>and setting</u> of the settlement as a whole. The coalescence of towns with surrounding settlements through new development will not be allowed to happen.</p>	
Policy CS5 - Affordable Housing	<p>Developers will be expected to integrate land for affordable homes within sites where housing is proposed, to ensure that affordable housing is provided and comes forward in parallel with market homes, with targets as follows:</p> <ol style="list-style-type: none"> <li>1. Where sites are between 0.17 hectares and 0.3 hectares or between 5 and 9 dwellings, 20% shall be affordable.</li> <li>2. Where sites are 0.3 hectares and above or 10 dwellings or more are proposed, 30% shall be affordable</li> </ol> <p>On those broad locations for development, identified in policies CS11 and CS12, <del>a target of 40% of affordable dwellings is set.</del> <u>individual targets for affordable housing may be set.</u> <del>This is</del> <u>These would be</u> subject to master planning and a viability review, the details <del>of</del> <u>for</u> which <del>will</del> <u>would</u> be set out in the Area Action Plans for Bury St Edmunds and Haverhill</p> <p>These criteria shall also apply where a site is part of a wider but contiguous site.</p> <p>Conditions or legal obligations will be used to ensure that affordable housing is secured and retained for those in housing need.</p> <p>The mix, size, type and tenure of affordable homes should meet the local identified housing need and be appropriately weighted to ensure that the provision makes at least a proportionate contribution to the categories of greatest need. Where it is demonstrated/proven that such an approach is necessary, the Local Planning Authority will consider issues of development viability and mix, including additional costs associated with the development of brownfield sites and the provision of significant community benefits, and may be willing to negotiate a lower percentage or tenure mix of affordable housing.</p>	<p>Changes have been made to the Affordable Housing requirements identified in CS11 (Bury St Edmunds Strategic Growth) and CS12 (Haverhill Strategic Growth). Rather than a 40% target, this has been amended to have individual targets in line with the masterplans and viability reviews for the areas.</p> <p>This is a substantial change to the policy that has been reassessed through the Sustainability Appraisal process.</p>
Policy CS6 - <del>Gypsy and Travellers</del>	<p><u>Sites will be identified for Gypsies, Travellers and Travelling Showpeople in the Rural Site Allocations DPD and the Area Action Plans for Bury St Edmunds and Haverhill in accordance</u></p>	<p>This policy has been updated to ensure it is</p>

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Accommodation - Gypsies, Travellers and Travelling Showpeople	<p><u>with national and regional policy.</u> Proposals for gypsy sites and sites for travelling show people will be permitted where a site has been identified in a DPD, or in the interim, where <u>they would not cause unacceptable harm having regard to the following factors:</u> <del>satisfactory evidence supporting a need for the accommodation is provided.</del> <u>Sites will be allocated and permitted in accordance with the criteria outlined in Policy CS2, where the site has good access to local services and facilities, and where:</u></p> <p><u>a) Designated and protected habitats and species, heritage designations, soil and water quality, and other natural resources;</u></p> <p><u>b) The location in relation to schools, medical facilities, shops and other local services and community facilities;</u></p> <p><del>1.c) The use of the site would not have an adverse impact upon</del> The amenities of nearby occupiers;</p> <p>d) Their size and scale in relation to any nearby existing community;</p> <p><del>2.e) The proposal would not detract from the undeveloped open and rural character and appearance of the countryside; and</del></p> <p><del>3. Adequate landscaping measures are included.</del></p> <p><u>f) The provision of a satisfactory means of access and the adequacy of the highway network.</u></p> <p>A condition or legal agreement to control the future use of sites for gypsies and travelling show people may be imposed, as appropriate.</p> <p>Where the <del>proven need use</del> <u>is</u> short term the development will be limited by a temporary permission.</p> <p><del>A criteria based policy for selecting and assessing sites suitable for accommodating gypsies and travelling show people will be set out in the Development Management DPD.</del></p>	<p>consistent with national policy. It makes reference to the Rural Site Allocations DPD and the Area Action Plans for Bury St Edmunds and Haverhill which will identify sites for Gypsies, Travellers and Travelling Showpeople.</p> <p>The policy now includes reference that the sites must not cause unacceptable harm to natural resources and local amenities. Sites must also have regard to the highway network.</p> <p>These are substantial changes to the policy that have been reassessed through the Sustainability Appraisal process.</p>
Policy CS7 - Sustainable Transport	<p>The council will develop and promote a high quality and sustainable transport system across the borough and reduce the need for travel through spatial planning and design.</p> <p>All proposals for development will be required to provide for travel by a range of means of transport other than the private car in accordance with the following hierarchy:</p>	<p>There has been no change to this policy and therefore the original assessment is still valid.</p>

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	<ul style="list-style-type: none"> <li>• Walking</li> <li>• Cycling</li> <li>• Public Transport (including taxis)</li> <li>• Commercial vehicles</li> <li>• Cars</li> </ul> <p>All development proposals will be required to be accessible to people of all abilities including those with mobility impairments.</p> <p>New commercial development, including leisure uses and visitor attractions, which generate significant demands for travel, should be located in areas well served by a variety of transport modes. Where appropriate, development proposals that will have significant transport implications will be required to have a transport assessment and travel plan showing how car based travel to and from the site can be minimised.</p>	
Policy CS8 - Strategic Transport Improvements	<p>The council will continue to work with relevant partners, including Suffolk County Council and the Highways Agency, and developers, to secure the necessary transport infrastructure, as identified in the Infrastructure Delivery Plan and, in particular to achieve improvements to:</p> <ul style="list-style-type: none"> <li>• Junctions 43 and 44 of the A14 adjacent to Bury St Edmunds;</li> <li>• Transport safety on the A1307 between Haverhill and the A11;</li> <li>• Relieve the adverse impacts of traffic in Bury St Edmunds, Haverhill and those villages which have identified transport issues;</li> <li>• Rail infrastructure in the borough;</li> <li>• The public transport network in the towns and rural areas; and</li> <li>• Rights of Way in the borough to achieve the objectives of the Suffolk Rights of Way Improvement Plan</li> </ul>	<p>CS8 has been updated to include the strategic road improvement to the Rougham Road/Sicklesmere Road through the delivery of a A134 relief road.</p> <p>This additional scheme has been included in an updated assessment for the Sustainability Appraisal process.</p>

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	<ul style="list-style-type: none"> <li>• <u>The Rougham Road/Sicklesmere Road through the delivery of a A134 relief road as part of the strategic growth to the south east of Bury St Edmunds</u></li> </ul>	
Policy CS9 - Employment and the Local Economy	<p><u>Provision will be made for development that will aim to deliver at least 13,000 additional jobs in the borough by 2026.</u> Employment land east of Suffolk Business Park, Bury St Edmunds (68.28 hectares) and Hanchett End at Haverhill (12 hectares) (<u>Proposals Map, Key Diagram and Appendix 5</u>) is allocated to enable the delivery of additional jobs in sustainable locations in the towns of Bury St Edmunds and Haverhill. Employment growth will also be achieved by the allocation of land for employment uses in mixed use developments in Bury St Edmunds, Haverhill, and the Key and Local Service Centres, and through policies supporting growth in the rural economy, retail, leisure and tourism. Existing General Employment Areas in or near Key Service Centres or Local Service Centres will continue to be protected and promoted for employment uses.</p> <p>Policies in Area Action Plans will ensure employment growth within a diverse local economy that will deliver a substantial proportion of the jobs target for "the Rest of Suffolk" identified in the East of England Plan. Growth will focus on Bury St Edmunds in the north of the borough to ensure that the town can fulfil its role as a Key Centre for Development and Change, by providing for quality employment development at the Suffolk Business Park. In the south of the borough, growth will be concentrated in Haverhill so that it can continue to meet the local employment needs in the Greater Cambridge area, particularly those of research and development and bio-technology industries.</p> <p>Existing employment areas will continue to meet local and sub-regional needs at Clare, Great Wrating, Chedburgh, Barnham, Saxham and Stanton/Hepworth (Shepherd's Grove).</p> <p>Proposals for growth in Key Service Centres and Local Service Centres will be expected to include provision for employment land and premises to meet local needs and encourage sustainable communities including, where viable, integrated within strategic areas of growth.</p> <p>All employment proposals will be expected to meet the criteria set out in Policy CS2 to protect and enhance natural resources and ensure the sustainable design of the built environment.</p> <p>Policies in Development Plan Documents will set criteria for the continued encouragement of sustainable employment development and tourism</p>	<p>This policy has been updated to include a target for the provision of additional jobs.</p> <p>This does not materially change the policy; the target was included to allow for clarity and ease of monitoring during delivery. The original assessment is still valid.</p>

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	development opportunities (including conversion of suitable buildings) in villages and rural areas.																																			
Policy CS10 - Retail, Leisure, <del>and Cultural</del> <u>and Office</u> Provision	<p>The town centres of Bury St Edmunds and Haverhill will continue to be the focus for new retail, leisure, cultural and office development, taking into account:</p> <ul style="list-style-type: none"><li>the need to maintain their vitality and viability;</li><li>the requirement to assess <u>and accommodate</u> the need for future growth;</li><li>the sequential approach to development;</li><li>the impact of any development on existing centres; and</li><li>the need to ensure locations are accessible by a variety of modes of transport</li></ul> <p>The 2007 Retail Appraisal identified the need for additional retail floorspace in Bury St Edmunds and Haverhill as outlined in the table below:</p> <table><tr><th rowspan="2">Location (1) (2)</th><th colspan="2">2011 (sq m net)</th><th colspan="2">2016 (sq m net)</th><th colspan="2">2021 (sq m net)</th></tr><tr><th>Convenience Goods</th><th>Comparison Goods</th><th>Convenience Goods</th><th>Comparison Goods</th><th>Convenience Goods</th><th>Comparison Goods</th></tr><tr><td>Bury St Edmunds</td><td>2,800</td><td>2,000</td><td>3,350</td><td>11,350</td><td>3,900</td><td>22,100</td></tr><tr><td>Bury St Edmunds Non Central</td><td>-150</td><td>2,050</td><td>400</td><td>9,300</td><td>950</td><td>17,550</td></tr><tr><td>Haverhill Town Centre</td><td>2,100</td><td>2,250</td><td>2,400</td><td>3,600</td><td>2,650</td><td>5,050</td></tr></table>	Location (1) (2)	2011 (sq m net)		2016 (sq m net)		2021 (sq m net)		Convenience Goods	Comparison Goods	Convenience Goods	Comparison Goods	Convenience Goods	Comparison Goods	Bury St Edmunds	2,800	2,000	3,350	11,350	3,900	22,100	Bury St Edmunds Non Central	-150	2,050	400	9,300	950	17,550	Haverhill Town Centre	2,100	2,250	2,400	3,600	2,650	5,050	<p>The title of this policy has been changed to reflect the inclusion of ‘Office’ provision.</p> <p>There has been minor wording change to include the requirements to accommodate future growth as well as assessing it.</p> <p>Further clarification notes have been added to the table included in the policy.</p> <p>None of these changes are material changes to the policy and therefore the original assessment is still valid.</p>
Location (1) (2)	2011 (sq m net)		2016 (sq m net)		2021 (sq m net)																															
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	Haverhill Non Central	0	-50	200	700	400	1,550	<p>(1) The forecasts in the table are cumulative, i.e. the forecasts for each date include the forecasts for the previous dates and are not additional to those earlier requirements.</p> <p>(2) The forecasts are for new floorspace in addition to the permitted Cattle Market scheme in Bury St Edmunds town centre. They include the proposed superstore on the Roys site in Bury St Edmunds town centre and the Tesco superstore in Haverhill; the net comparison goods sales areas in which should be subtracted from the forecasts, to arrive at the capacity for further floorspace thereafter</p> <p>(3)The 'Town Centre' and 'Non Central' retail floorspace figures should not be used to prejudge the outcome of the sequential approach.</p> <p>Since the Appraisal was completed, additional consents have been granted for (Asda) 3,400 sq metres net of convenience goods floorspace in Bury St Edmunds and (Tesco) 3,988 sq metres net of convenience goods floorspace in Haverhill. The net areas should be subtracted from the above forecasts in the 2011 column to arrive at the capacity of further floorspace thereafter.</p> <p>Retail and leisure activity elsewhere will be focused on those Key Service and Local Service Centres identified in Core Strategy Policy CS4 and in the new local centres located in the areas for growth identified in Policies CS11 and CS12. The development of services and facilities in these locations will be expected to be of an appropriate scale and character to reflect the role and function of the local centres and in accordance with the sequential approach.</p>
Policy CS11 - Bury St Edmunds Strategic Growth	<p>An Area Action Plan DPD will be prepared for Bury St Edmunds that will provide a co-ordinated spatial planning framework for the whole town, including the release of larger, strategic greenfield sites.</p> <p>Subject to other relevant policies, in particular CS2, the release of strategic greenfield sites will have regard to the <del>need to the develop previously developed land</del> <u>first spatial strategy in CS1</u> and the need to ensure that all essential infrastructure is in place before any development is occupied or as required by the local planning authority.</p> <p>In order to accommodate the long term strategic growth for the town, land will be released, in a phased manner, in the following locations:</p>							<p>Policy CS11 has been updated to reflect changes to Policy CS1 (which will be reassessed as part o the policy CS1 updated assessment).</p> <p>There have been wording changes to reflect a positive integration of education, community and</p>

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	<p>i) 2011 onwards - Limited growth to the north-west that:</p> <ul style="list-style-type: none"> <li>• Maintains the identity and segregation of Fornham All Saints;</li> <li>• Provides new high quality strategic public open space and recreation facilities between the development and Fornham All Saints;</li> <li>• Provides traffic relief for Fornham All Saints in the form of a relief road between the A1101 south east of the village and the B1106 to the south;</li> <li>• Delivers around 900 homes of mixed tenure and size, including affordable homes;</li> <li>• Provides opportunities for B1 use class local employment;</li> <li>• Delivers additional education, community and leisure facilities to meet the needs of this development and <u>is located in a way that can achieve positive integration with the deficits of the wider area;</u> and</li> <li>• Provides improved public transport, foot and cycle links to the town centre and other locally significant leisure, employment and service destinations.</li> </ul> <p>ii) 2011 onwards – Limited growth completing the existing Moreton Hall urban extension by:</p> <ul style="list-style-type: none"> <li>• Making provision for a secondary school;</li> <li>• Providing additional recreation and community facilities, including the relocation of Bury Town Football Club;</li> <li>• Delivering <del>up to</del> <u>around</u> 500 homes of mixed tenure and size, including affordable homes;</li> <li>• Providing improved public transport, foot and cycle links to the town centre and other locally significant leisure, employment and service destinations;</li> </ul>	<p>leisure facilities with the wider area.</p> <p>Specific dates have been removed from the references to Medium Term and Short Term.</p> <p>None of these changes are material changes to the policy and therefore the original assessment is still valid.</p>

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	<ul style="list-style-type: none"> <li>• Enabling potential transport links to the north of the railway line;</li> </ul> <p>The additional housing will not be permitted until the completion of the Eastern Relief Road to junction <del>44</del><u>45</u> of the A14 (Rookery Crossroads).</p> <p>iii) <del>After 2016</del> Medium term - Limited growth to the west that:</p> <ul style="list-style-type: none"> <li>• Maintains the identity and segregation of Westley;</li> <li>• Provides new high quality public open space and recreation facilities between the development and Westley;</li> <li>• Provides traffic relief for Westley in the form of a relief road to the east of the village;</li> <li>• Delivers around 450 homes of mixed tenure and size, including affordable homes;</li> <li>• Makes provision for the long term development of a sub-regional health campus (relocation of the West Suffolk Hospital) of landmark buildings set within high quality landscapes;</li> <li>• Delivers additional education, community and leisure facilities to meet the needs of this development and <u>is located in a way that can achieve positive integration with the deficits of the wider area;</u> and</li> <li>• Provides improved public transport, foot and cycle links to the town centre and other locally significant leisure, employment and service destinations.</li> </ul> <p>iv) <del>After 2021</del> Long term strategic growth - north-east Bury St Edmunds that:</p> <ul style="list-style-type: none"> <li>• Maintains the identity and segregation of Great Barton and creates a new, high quality, entrance to Bury St Edmunds;</li> <li>• Facilitates the provision of an A143 Great Barton bypass;</li> </ul>	

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	<ul style="list-style-type: none"> <li>• Contributes to reducing congestion at appropriate junctions on the A14 in Bury St Edmunds;</li> <li>• Provides improved public transport, foot and cycle links to the town centre and south towards the A14 and strategic employment sites;</li> <li>• Delivers around 1,250 homes of mixed tenure and size, including affordable homes;</li> <li>• Provides opportunities for B1 use class local employment;</li> <li>• Provides new high quality strategic public open space and recreation facilities; and</li> <li>• Delivers additional education, community and leisure facilities to meet the needs of this development and is located in a way that can achieve <u>positive integration with the deficits</u> of the wider area;</li> </ul> <p>v) <del>After 2021</del> Long term strategic growth – south-east Bury St Edmunds that:</p> <ul style="list-style-type: none"> <li>• Positively uses the framework for new development provided by the existing natural environment and character of the area including maintaining significantly important open spaces that provide the setting of the historic centre;</li> <li>• Makes a positive contribution to reducing the potential for flooding both in the area and downstream in the Lark Valley</li> <li>• Contributes to reducing congestion at appropriate junctions on the A14 in Bury St Edmunds;</li> <li>• Delivers a relief road that reduces levels of through traffic using the A134 Rougham Road and Sicklesmere Road;</li> <li>• Provides improved public transport, foot and cycle links to the town centre and</li> </ul>	

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	<p>north towards the A14 and strategic employment sites;</p> <ul style="list-style-type: none"> <li>• Contributes to reducing congestion at appropriate junctions on the A14 in Bury St Edmunds;</li> <li>• Provides new high quality strategic public open space and recreation facilities; and</li> <li>• Delivers additional education, community and leisure facilities to meet the needs of this development and is located in a way that can <u>achieve positive integration with the deficits</u> of the wider area; and</li> <li>• Delivers around 1,250 homes of mixed tenure and size, including affordable homes;</li> </ul> <p>In each case, the actual amount of development will be determined by environmental and infrastructure capacity considerations and the preparation and adoption of detailed masterplans in which the local community and other stakeholders have been fully engaged.</p> <p>Provision of affordable housing and, where appropriate, sites for gypsy's and travellers should be made in accordance with Policies CS5 and CS6.</p>	
Policy CS12 - Haverhill Strategic Growth	<p>An Area Action Plan DPD will be prepared for Haverhill that will provide a co-ordinated spatial planning framework for the whole town including the release of larger, strategic, greenfield, sites. Land north-west of Haverhill allocated in Policies HAV2 and HAV8 of the Replacement St Edmundsbury Borough Local Plan 2016 is confirmed by this Core Strategy, with the potential to deliver <del>1,100</del> <u>1,150</u> new homes and other services and facilities and the north-west relief road. The development will be undertaken in accordance with the masterplan that was approved by the Council in June 2009.</p> <p>In addition, it will be necessary to release a larger, strategic greenfield site at Haverhill to deliver the development strategy of the Local Development Framework. Subject to other relevant policies, in particular CS2, the site will be released in a phased manner, <del>having regard to the need to develop previously developed land first and</del> <u>having regard to the spatial strategy in Policy CS1, and the need</u> to ensure that all essential infrastructure is in place before any</p>	<p>Policy CS12 has been amended to reflect updates to policy CS1 that will be assessed through the updated assessment of CS1.</p> <p>The reference to the Haverhill north east relief road has been deleted.</p> <p>There has been wording changed to reflect a positive integration of</p>

Revised Policy Reference and Title (10 <sup>th</sup> August 2010)	Revised Policy Text (post Inspector's Report of 24th August 2010) (New text shown <u>as underlined</u> . Deleted text shown as <del>striked through</del> ).	Comments
	<p>development is occupied and that agreements are in place to deliver the desirable infrastructure required as a result of the development.</p> <p>Land on the north-eastern edge of Haverhill will:</p> <ul style="list-style-type: none"> <li>• Maintain the identity and segregation of Kedington and Little Wratting;</li> <li>• Provide new high quality strategic public open space and recreation facilities;</li> <li>• Protect by appropriate means the Scheduled Ancient Monument at Wilsey Farm;</li> <li>• <del>Deliver a north-east relief road for Haverhill between the A143 and the A1017 and the local distributor road network;</del></li> <li>• Provide improved public transport, foot and cycle links to the town centre and other locally significant leisure, employment and service destinations;</li> <li>• Deliver additional education, community and leisure facilities to meet the needs of this development and <u>is located in a way that can achieve positive integration with the deficits of the wider area;</u></li> <li>• Deliver around 2,500 homes of mixed tenure and size, including affordable homes; and</li> <li>• Provide opportunities for B1 use class local employment.</li> </ul> <p>It is unlikely that the development at the north-eastern edge will commence before 2021. The actual amount of development will be determined by environmental and infrastructure capacity considerations and the preparation and adoption of detailed masterplans in which the local community and other stakeholders have been fully engaged.</p> <p>Provision of affordable housing and, where appropriate, sites for gypsy's and travellers should be made in accordance with Policies CS5 and CS6.</p>	<p>education, community and leisure facilities with the wider area.</p> <p>None of these changes are material changes to the policy and therefore the original assessment is still valid.</p>
Policy CS13 Rural Areas	The scale of development in Key Service Centres, Local Service Centres and Infill Villages, as defined in Policy CS1, will reflect the need to maintain the sustainability of local services for the	This policy has changed to include the protection

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	communities they serve, the diversification of the economy and the provision of housing for local needs. Development outside the settlements defined in Policy CS4 will be strictly controlled, with a priority on protecting and enhancing the character, appearance, <u>historic qualities</u> and biodiversity of the countryside while promoting sustainable diversification of the rural economy. Policies in the Development Management DPD and Rural Site Allocations DPD will set out detailed uses which are appropriate in rural areas.	of historic qualities as a priority. This has not a material change to the policy and therefore the original assessment is still valid.
Policy CS14 – Sequential approach to development of sites	<p><del>In accordance with the spatial strategy, and the criteria set out in other policies, particularly CS2, the Council will promote the re-use of previously developed land within housing settlement boundaries ahead of releasing strategic greenfield sites for new neighbourhoods. The need to release land for new neighbourhoods will be assessed against the delivery of housing within the towns concerned. Matters to be considered in making such an assessment will include:</del></p> <ul style="list-style-type: none"> <li><del>• The potential to deliver national and regional targets for the development of previously developed land;</del></li> <li><del>• The projected delivery of the annual target for constructing new homes in the borough;</del></li> <li><del>• The delivery of required infrastructure; and</del></li> <li><del>• Achieving the objectives of the spatial strategy.</del></li> </ul>	This policy has been deleted and policies CS1, CS11 and CS12 have been updated to include reference to the Sequential Approach, This policy does not need to be reassessed and the original assessment is now obsolete.
Policy CS15 <del>CS14</del> - Community infrastructure capacity and tariffs	<p>An Infrastructure Delivery Plan <del>will be</del> <u>has been</u> prepared to supplement the Core Strategy and ensure that development and the delivery of infrastructure is coordinated.</p> <p>All new proposals for development will be required to demonstrate that the necessary on and off-site infrastructure capacity required to support the development and to mitigate the impact of it on existing infrastructure exists or will exist prior to that development being occupied.</p> <p>In circumstances where the provision or improvement of infrastructure or other works or facilities is necessary, both within and beyond the borough boundary, to address community or environmental needs associated with new development or to mitigate the impact of development on the environment or existing communities, standard charges and/or standard formulae will be imposed for the payment of financial contributions towards such infrastructure, works or facilities</p>	<p>The number of this policy has changed to reflect the deleted policy CS14.</p> <p>There are minor changes to the policy wording to include the Suffolk Constabulary as a partner. Police resources have then been removed from “essential infrastructure”. Haverhill</p>

Revised Policy Reference and Title (10 <sup>th</sup> August 2010)	Revised Policy Text (post Inspector's Report of 24th August 2010) (New text shown <u>as underlined</u> . Deleted text shown as <del>striked through</del> ).	Comments
	<p>to ensure that all such development makes an appropriate and reasonable contribution to the costs of provision.</p> <p>The requirement to pay the standard charge and/or standard formulae will be reviewed and modified as appropriate in circumstances where the provision of infrastructure, works or facilities normally covered by standard charges is to be provided as part of the development proposals.</p> <p>The provision of infrastructure will be linked directly to phasing of development on land throughout the borough to ensure that there is no detrimental impact on existing infrastructure, the environment or residential amenity. It will be coordinated and delivered in partnership with other authorities and agencies such as the local highways authority, local education authority, the environment agency, primary care trusts, <u>Suffolk Constabulary</u>, utility companies and other private and public sector partners. The Local Strategic Partnership will also have an important role to play in the co-ordination of infrastructure delivery.</p> <p>Key infrastructure requirements to deliver the objectives of the Core Strategy include, but are not limited to:</p> <p>1. Fundamental Infrastructure</p> <ul style="list-style-type: none"> <li>• New relief roads in Bury St Edmunds; <del>and Haverhill</del>;</li> <li>• Improved sustainable transport links between new neighbourhoods and town centres and other destinations, including cycle networks;</li> <li>• Junction improvements to A14;</li> <li>• Additional substations and upgrades to wastewater works.</li> </ul> <p>2. Essential Infrastructure</p> <ul style="list-style-type: none"> <li>• Additional school place provision, including new school sites;</li> <li>• Additional GPs and Dentists;</li> <li>• Local convenience shops.</li> <li>• <u>Police resources such as Police Community Support Officers</u></li> </ul>	<p>relief road has been removed from the essential infrastructure section.</p> <p>None of these changes is deemed to have an effect on the assessment of the policy previously undertaken. The original assessment is therefore still valid.</p>



Revised Policy Reference and Title (10 <sup>th</sup> August 2010)	Revised Policy Text (post Inspector's Report of 24th August 2010) (New text shown <u>as underlined</u> . Deleted text shown as <del>striked through</del> ).	Comments
	<p>3. Required Infrastructure</p> <ul style="list-style-type: none"> <li>• Community facilities across the borough;</li> <li>• Leisure, open space, recreation provision and public realm enhancements.</li> </ul>	
Policy <del>CS14</del> <u>CS15</u> - Plan, Monitor, Manage	<p>Compliance with policies and allocations in the Local Development Framework (LDF) will be continuously monitored throughout the plan period. If, through monitoring, it appears that policies and allocations are not being met, the following mechanisms will be triggered:</p> <ol style="list-style-type: none"> <li>1. Review of housing and employment land supply and allocations;</li> <li>2. Action to bring forward sites for development, wherever possible in partnership with landowners and developers;</li> <li>3. Action to bring forward development on previously developed land;</li> <li>4. Action to secure the timely provision of infrastructure;</li> <li>5. Review of relevant parts of the LDF</li> </ol>	<p>The number of this policy has changed to reflect the deleted policy CS14.</p> <p>There are no changes to the policy wording and therefore the original assessment is still valid.</p>

## Assessment of Revised Policies

- 10.8 The assessment rationale used for the reassessment of the policies is the same as that used for the original assessment, see table 9.2.

### Policy CS1: St Edmundsbury Spatial Strategy

- 10.9 For appraisal purposes, policies CS1 and CS4 were originally assessed together (note that policy CS4 was previously policy CS5 in the assessment undertaken in Section 9); this is because they have a similar aim which is to set out the spatial location and distribution of residential development in St Edmundsbury to meet the identified housing targets set out in the East of England Plan for the period 2001-2021 (which has since been revoked).
- 10.10 Policy CS1 has been updated to provide further clarity with regards to the sequential approach and the release of land for development. It recognises that the development of previously developed land will need to be balanced with the release of further greenfield land. There is an overall increase of 38 dwellings to be provided in the borough; however, these are to be provided in Bury St Edmunds and Haverhill, with the Rural Areas providing fewer dwellings in the revised Policy CS1 than in the original Policy CS1.
- 10.11 In the original assessment, these policies performed well against the social objectives, by ensuring that the housing needs for the borough are met in the plan period; this still is the case. The overall intention of policy CS1 remains to focus development in existing towns and service centres; thus focussing development in sustainable locations maximising the opportunity for walking and cycling to work, study and services. Focussing in existing towns and service centres could also contribute to securing long term investment for key services in these areas.
- 10.12 The original assessment identified that the provision of new housing will inevitably have negative effects on the environment (with negative effects against SA objectives 9, 11, 12, and 14); this is still the case with revised policy CS1.
- 10.13 SA objective 7 is related to meeting the housing requirements of the whole community. This is the aim of policy CS1 and therefore, as with the original assessment, it will still have a 'Moderately Positive' effect.
- 10.14 In summary, the revised policies will not additionally have a negative effect upon delivery of the SA objectives.

### Policy CS2 - Sustainable Development

- 10.15 Policy CS2 is the overarching policy related to Sustainable Development. In terms of Sustainable Design the main changes to the policy have been related to seeking carbon neutral development only where "feasible and viable". An expectation for Code for Sustainable Homes Level 4 or for BREEAM Very Good (medium schemes) or BREEAM Excellent (large schemes) to be achieved has been removed and replaced with a reference to adhering with national codes and targets. These changes are likely to have the effect that fewer developments attain these targets in the revised policy than the original one.
- 10.16 As would be expected, the original assessment found that there would be overall positive effects on all of the environmental SA objectives. There were also positive effects on some of the social and economic objectives.
- 10.17 Changes to Policy CS2 seeks to protect international sites by putting in place a 1.5 km buffer zone around Breckland SPA for stone curlew and a 400 m buffer zone for woodlark and nightjar. This policy also puts in place a 1.5 km buffer zone around areas outside of the SPA which have supported five or more nesting attempts by stone curlew since 1995 and as such act as supporting stone curlew habitat. In these areas development may only take place for the re-use of existing buildings and for development which will be completely masked from the SPA by existing development or provided it is demonstrated by an Appropriate Assessment that the development will not adversely affect the integrity of the SPA. This results in a change in scoring for objective

16 (To conserve and enhance biodiversity and geodiversity) from 'Moderately positive' to 'Strongly positive'.

10.18 The revised policy is unlikely to have a negative effect on any of the SA objectives. However, by reducing the need for mandatory Code for Sustainable Homes and BREEAM ratings, it is likely that sustainability of new developments will be lower than with the previous CS2 policy. With the policy now just requiring sustainability ratings in line with national requirements, unless included in lower tier DPDs and backed up with viability details, the assessment against the following SA objectives changes from 'Strongly Positive' with the previous CS2 policy to 'Slightly Positive' with the revised CS2 policy:

- SA Objective 1: To improve the health of the population overall and reduce health inequalities
- SA Objective 9: To improve water and air quality
- SA Objective 10: To conserve soil resources and quality
- SA Objective 11: To use water and mineral resources efficiently, and re-use and recycle where possible
- SA Objective 12: To reduce waste
- SA Objective 14: To reduce contributions to climate change
- SA Objective 15: To reduce vulnerability to climatic events

#### **Policy CS5 - Affordable Housing**

10.19 Policy CS5 on Affordable Housing has been amended with regards to the targets for Bury St. Edmunds and Haverhill. It was felt that a 40% target was not appropriate but that individual targets should be set depending on viability.

10.20 The original assessment of this policy found that it would have significant positive effects against three of the social objectives; related to affordable housing provision helping to tackle poverty and social exclusion (SA Objective 4), providing affordable housing in accessible locations (SA Objective 5) and providing sufficient housing that is affordable (SA Objective 7). The policy was also expected to benefit SA economic objective 20 (*Revitalise town centres*) by supporting the viability of the population through enabling local people to afford to buy houses in the area.

10.21 The updated policy is likely to reduce the amount of affordable housing provided in Bury St. Edmunds and Haverhill (Key growth areas) and therefore is likely to deliver a slightly less positive effect in terms meeting the SA objectives. However, overall the policy will still deliver 'Moderately Positive' effects and therefore there is no change to the assessment.

#### **Policy CS6 - Gypsies, Travellers and Travelling Showpeople**

10.22 This policy has been updated to provide a requirement that a minimum of 20 pitches are provided by 2011. The policy wording with regards to protection of the environment has been improved with specific reference to the protection of "designated and protected habitats and species, heritage designations, soil and water quality, and other natural resources". Sites should also not cause unacceptable harm to "the provision of a satisfactory means of access and the adequacy of the highway network".

10.23 The original assessment found that the original policy would have a 'Moderately Negative' effect on the conservation of soil resources and quality (SA Objective 10) and the conservation and enhancement of biodiversity and geodiversity (SA Objective 16). The revised policy includes stronger wording for the protection of these resources and although there is still unlikely to be a positive effects, the scoring of the effect has changed from 'Moderately Negative' to 'Slightly Negative'.

10.24 The original assessment found there was 'No effect' on reducing the effects of traffic on the environment (SA Objective 13). With the inclusion of the specific point on provision of satisfactory means of access, this will now have a 'Slightly Positive' effect.

- 10.25 In summary, the revised policy is an improvement and will provide greater protection to the environment, albeit that there is still a 'Slightly Negative' effect. The revision relating to highway provision is also beneficial now providing a 'Slightly Positive' effect.

**Policy CS8 - Strategic Transport Improvements**

- 10.26 An additional traffic scheme has been added into the policy on Strategic Transport Improvements: "The Rougham Road/Sicklesmere Road through the delivery of a A134 relief road as part of the strategic growth to the south east of Bury St Edmunds".
- 10.27 The original assessment of this policy focussed on a number of other strategic transport improvements and found that there was a mix of positive effects (to SA Objective 5: Access to Services; SA Objective 19: Economic Growth; SA Objective 21: Encouraging Efficient Movements and SA Objective 22: Encouraging Investment) and negative effects (SA Objective 14: Reducing Contributions to Climate Change and SA Objective 15: Reducing Vulnerability to Climatic Events). The addition of the relief road scheme is likely to also contribute to the same positive and negative effects and therefore the effects are unchanged.

**Comparison of Summary of Effects**

- 10.28 Table 10.2 compares the summary of effects of the 2010 revised Core Strategy DPD against the summary of effects of the 2009 Submission Core Strategy DPD.

ATKINS

ATKINS

16	To conserve and enhance biodiversity and geodiversity	-	-	++	+++	+++	0	0	0	0	--	-	0	0	+/-	+/-	0	0	0	0	-	-	-	-	-	0	0
17	To conserve and where appropriate enhance areas of historical and archaeological importance	-	-	++	++	+	++	++	0	0	-	-	0	0	+/-	+/-	0	0	0	0	--	--	+	+	-	0	0
18	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	-	-	++	++	+	++	++	0	0	-	-	0	0	+/-	+/-	0	0	0	0	-	-	+	+	-	0	0
19	To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	+	0	0	0	0	0	0	0	0	0	0	0	++	++	++	++	+	+	++	++	+	+	+	++	++
20	To revitalise town centres	++	++	+	+	0	++	++	0	0	+	+	0	0	++	++	++	++	++	++	++	++	+	+	++	++	++
21	To encourage efficient patterns of movement in support of economic growth	+	+	0	0	0	++	++	0	0	0	0	0	0	++	++	0	0	0	0	++	++	0	0	+	0	0
22	To encourage and accommodate both indigenous and inward investment	0	0	0	0	0	0	0	0	0	0	0	0	0	++	++	++	++	0	0	++	++	+	+	0	0	0

+++	Strongly positive
++	Moderately positive
+	Slightly positive
0	No effect
-	Slightly negative
--	Moderately negative
---	Strongly negative
+/-	Combination of positive and negative effects / neutral effect

## Cumulative, Synergistic and Indirect Effects

- 10.29 The assessment of the revised policies above focussed primarily on direct effects. As required by the SEA Regulations, cumulative, synergistic and indirect effects have also been recorded and analysed during the appraisal of the revised policies. Table 10.3 below shows the results of this analysis taken from table 9.4 (based on the original assessment). This has been updated with commentary on how the updated policies following the Inspector's Report will impact this assessment. The original policy numbers from the assessment in Section 9 have changed so these have been updated in the 'Policies' column. The 'Causes' column includes the impact of the updated policy in *italic* text.

Table 10.3 – Revised Cumulative, Synergistic and Indirect Effects

Policies (bold indicates policies that have been reassessed)	Effects	Causes	Significance
<b>CS1, CS2, CS3, CS4, CS7, CS11, CS12, CS14</b>	Cumulative and synergistic effects on improving the health of St Edmundsbury's resident population	<p>Taken together, these policies all seek to address aspects that contribute to improving health, encompassing high quality housing; improvement in walking and cycling provision as well as an improvement in sports and recreational facilities and access to them; and improvement of the natural environment and transport that may improve air quality and a sense of wellbeing.</p> <p><i>The updates to policies CS1 and CS2 will not affect this effect as the overarching spatial strategy remains the same and CS2 will still seek to improve the natural environment.</i></p>	Significant positive effects increasingly apparent over the medium to longer term.
<b>CS1, CS4, CS11, CS12</b>	Indirect effects on improving levels of education and skills	<p>The spatial hierarchy and policies for strategic growth in Haverhill and Bury St Edmunds should help to improving overall education and skill level for the local population.</p> <p><i>The update to policy CS1 will not affect this effect as the overarching policy is still to provide for strategic growth in Bury St. Edmunds and Haverhill.</i></p>	Indirect positive effects likely over the longer terms as development proposals and infrastructure is completed.
<b>CS2, CS5, CS6, CS7</b>	Indirect effect on tackling poverty and social exclusion	<p>A number of the policies may, when taken together, help to reduce poverty and social exclusion in St Edmundsbury. These factors include: improving the quality of housing and development as well as affordability, improving skills levels and access to community facilities, education and employment, and improving health levels.</p> <p><i>The update to policy CS5 on Affordable Housing may mean there are lower levels of affordable housing in Bury St. Edmunds and Haverhill, however there will still be provision for affordable housing and therefore this effect remains.</i></p>	Indirect positive effects likely over the longer term as development proposals and infrastructure completed, providing this is done in an equitable way across the plan area.
All CS Policies	Cumulative effects on improving accessibility to	The cumulative effect of policies concerned with the locational approach, focusing the greatest concentrations of development	Significant positive effects developing over the medium and longer



Policies (bold indicates policies that have been reassessed)	Effects	Causes	Significance
	services and facilities	within central and accessible locations, should result in an overall reduction in the need for residents and workers to travel to access essential services and facilities.  <i>The updates to policies will not have any impact on this effect.</i>	term as more development opportunities are realised.
<b>CS1</b> , CS4, <b>CS5</b> , <b>CS6</b> , CS11, CS12	Cumulative effects of meeting the housing requirements of St Edmundsbury	These policies cumulatively will meet the housing requirement for Bury St Edmunds.  <i>The update to CS5 on Affordable Housing may mean that there is less affordable housing availability than the previous policy, however, there will still be provision for affordable housing and therefore this effect will still remain.</i>	Significant positive effects developing over the medium and longer term as more development opportunities are realised.
All	Cumulative effects on air quality	An increase in development and road infrastructure may lead to a net increase in overall traffic volume, despite efforts to create a modal shift, and thus lead to the deterioration of air quality.  <i>Updated policy CS8 includes an additional strategic transport improvement. The effects of this on air quality are unknown; positive effects may arise from a reduction in congestion, but negative effects may arise from modal shift to the private car.</i>	Significant negative effects developing over the medium to longer term as more development occurs.
<b>CS1</b> , <b>CS8</b> , CS11, CS12	Cumulative effects on contributing to climate change and vulnerability of climatic events	GHG emissions arise from a wide variety of sources including transport, construction, waste transfer and the general operation of buildings (heating and lighting systems). As such, the cumulative effects of realising the scale of development set out in these policies is likely to result in an overall increase in GHG emissions across the plan area, irrespective of the potential effects of other policy provisions. The focus of growth around the airport will likely exacerbate these effects.  <i>The updated policies will have no impact on the effects noted above.</i>	Significant and permanent negative effects, becoming increasingly apparent over the medium and longer term.
<b>CS1</b> , <b>CS2</b> , CS7, <b>CS8</b> , CS9, CS10, CS11, CS12	Cumulative and synergistic effects on reducing the effects of traffic on the environment	The cumulative and synergistic effects of policies concerned with the locational approach of focusing the greatest concentrations of development with main population centres; and the promotion of a combination of physical and incentive based measures aimed at encouraging the use of public transport on encouraging modal shift to non-car modes, particularly for short distance and commuting trips.  <i>Updated Policy CS1 recognises that</i>	Significant positive effects developing over the medium to longer term as more development opportunities and infrastructure proposals are completed.



Policies (bold indicates policies that have been reassessed)	Effects	Causes	Significance
		<i>development on brownfield sites needs to be balanced with development of greenfield land in order to meet housing targets. This may have the impact of negating to some degree the positive effects identified above. Updated policy CS8 includes an additional strategic transport improvement. The effects of this on air quality/ carbon emissions are unknown; positive effects may arise from a reduction in congestion, but negative effects may arise from modal shift to the private car.</i>	
<b>CS1, CS2, CS8, CS9, CS10, CS11, CS12, CS14</b>	Indirect effects of strengthening the local economy in St Edmundsbury	<p>The spatial hierarchy and policies for strategic growth in Haverhill and Bury St Edmunds should help to strength the economy.</p> <p><i>Updated Policy CS8 includes an additional strategic transport improvement as part of the strategic growth to the south east of Bury St Edmunds – this will strengthen this effect.</i></p>	Indirect positive effects likely over the longer term.

## 11. Mitigation

- 11.1 The term mitigation encompasses any approach that is aimed at preventing, reducing or offsetting significant adverse environmental effects that have been identified. In practice, a range of measures applying one or more of these approaches is likely to be considered in mitigating any significant adverse effects predicted as a result of implementing the Core Strategy. In addition, it is also important to consider measures aimed at enhancing positive effects. All such measures are generally referred to as mitigation measures.
- 11.2 However, the emphasis should be in the first instance on proactive avoidance of adverse effects. Only once alternative options or approaches to avoiding an effect have been examined should mitigation then examine ways of reducing the scale/importance of the effect.
- 11.3 Mitigation can take a wide range of forms, including:
- Suggested re-wording of some policies in order to improve the likelihood of positive effects and to minimise adverse effects;
  - Technical measures (such as setting guidelines) to be applied during the implementation stage;
  - The effective implementation of other relevant Core Policies within the Core Strategy;
  - Identifying issues to be addressed in project environmental impact assessments for certain projects or types of projects;
  - Contingency arrangements for dealing with possible adverse effects.
- 11.4 Mitigation measures for each Policy (based on the submission Core Strategy) have been considered and the Policies Assessment Tables (Appendix D) include cross-references to mitigation measures where appropriate.
- 11.5 Recommendations on how to strengthen identified positive effects or minimise negative effects were identified for a number of policies in section 9.

## 12. Monitoring

- 12.1 The SEA Directive states that  
*'member states shall monitor the significant environmental effects of the implementation of plans and programmes...in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action'* (Article 10.1).
- 12.2 In addition, the Environmental Report should provide information on a  
*'description of the measures envisaged concerning monitoring'* (Annex I (i)) (Stage E).
- 12.3 SA monitoring will cover significant social and economic effects as well as significant environmental effects; and it involves measuring indicators which will enable the establishment of a causal link between the implementation of the plan and the likely significant sustainability effects (both beneficial or adverse) being monitored. This will allow the identification of any unforeseen adverse effects and enable appropriate remedial action to be taken.
- 12.4 The SA guidance recommends SA monitoring is incorporated into each Council's existing monitoring arrangements. Under Section 35 of the Planning and Compulsory Purchase Act 2004 and Regulation 48 of the Town and Country Planning Regulations 2004 the Councils are required to prepare Annual Monitoring Reports (AMRs) to assess the implementation of their LDFs. For monitoring efforts to be optimally effective, it will be important that the Councils seek to integrate the monitoring of the significant sustainability effects of the JMDPD with the AMR process.
- 12.5 Potential indicators for monitoring these effects have been identified as part of this appraisal and are listed under the relevant objective in the SA framework set out in Table 6.1 above.
- 12.6 In order to reach a final framework of indicators for their AMRs the Councils will need to consider the indicators proposed in the SAs to identify those which can be most effectively used to monitor the sustainability effects of each LDF as a whole. This will need to be undertaken in dialogue with statutory consultees and other bodies, as in many cases the monitoring information may need to be provided by outside bodies.
- 12.7 The following significant effects against all the SA objectives (including direct and cumulative, synergistic and indirect effects) have been identified by the assessment and form the basis of the monitoring programme:

### **SA Objectives with identified significant effects**

- 1 - To improve the health of the population overall and reduce health inequalities (*positive effects*)
- 2 - To maintain and improve levels of education and skills in the population overall (*positive effects*)
- 3 - To reduce crime and anti-social activity (*positive effects*)
- 4 - To reduce poverty and social exclusion (*positive effects*)
- 5 - To improve access to key services for all sectors of the population (*positive effects*)
- 6 - To offer everybody the opportunity for rewarding and satisfying employment (*positive effects*)
- 7 - To meet the housing requirements of the whole community (*positive effects*)
- 8 - To improve the quality of where people live and to encourage community participation (*positive effects*)
- 9 - To improve water and air quality (*both positive and negative effects*)
- 10 - To conserve soil resources and quality (*both positive and negative effects*)
- 11 - To use water and mineral resources efficiently, and re-use and recycle where possible (*both positive and negative effects*)

- 12 - To reduce waste (*both positive and negative effects*)
- 13 – To reduce the effects of traffic on the environment (*positive effects*)
- 14 - To reduce contributions to climate change (*both positive and negative effects*)
- 15 - To reduce vulnerability to climatic events (*both positive and negative effects*)
- 16 - To conserve and enhance biodiversity and geodiversity (*both positive and negative effects*)
- 17 - To conserve and where appropriate enhance areas of historical and archaeological importance (*both positive and negative effects*)
- 18 -To conserve and enhance the quality and local distinctiveness of landscapes and townscapes (*positive effects*)
- 19 - To achieve sustainable levels of prosperity and economic growth throughout the plan area (*positive effects*)
- 20 - To revitalise town centres (*positive effects*)
- 21 - To encourage efficient patterns of movement in support of economic growth (*positive effects*)
- 22 - To encourage and accommodate both indigenous and inward investment (*positive effects*)

- 12.8 The monitoring programme outlined in Table 12.1 below is preliminary and will be confirmed at the time of the adoption of the Core Strategy DPD. Monitoring of the direct and cumulative, synergistic and indirect effects was combined where these overlap and where the suggested set of indicators can be used to monitor two or more effects. The programme may still evolve based on the results of public consultation, dialogue with environmental and other consultees and the identification of additional data sources, as in many cases information will be provided by outside bodies. It should be noted, however, that there will be a need for careful consideration of the practicalities of monitoring to be taken into account in shaping the final monitoring strategy, especially in the context of limited resources at the Borough level. The emphasis must be on creating a balanced, effective, yet achievable set of monitoring criteria.

Table 12.1 - Proposed Monitoring Programme

No	Effects to be monitored	Indicator(s) to be used	Target	Suggested frequency of review/analysis of monitoring data/mitigation	Responsibility for undertaking monitoring
1	Effects on improving the health of the population overall and reducing health inequalities	Proportion of population with access to hospital or GP or dentist surgery	% Increase	Periodically	SEBC (DfT accessibility indicators)
		Proportion of journeys to work on foot or by cycle	% Increase	Annual	SEBC
		How do children travel to school?	Non identified	Annual	SEBC
		Obesity in the population		Annual	SEBC (Department of Health indicator 7.01)
		Participation in sport and active recreation	70% of population participants in 30 mins activity, 5 times a week by 2020 <i>Source: The Framework for Sport in England: A Vision for 2020</i>	Annual	SEBC (National Indicator 8)
2	Effects on maintaining and improving levels of education and skills in the population overall	Average point score per student at A and AS level	% Increase	Annual	SEBC
		Proportion of the population with no qualifications	% Increase	Annual	SEBC
3	Effects on reducing crime and anti-social activity	Crime rate per 1000 population	Decrease	Annual	SEBC (Suffolk Speaks, British Crime Survey)
		Fear of Crime	Decrease	Annual	SEBC (Suffolk Speaks, British Crime Survey)
4	Effects on reducing poverty and social exclusion	Proportion of the population who live in wards that rank within the	% Reduce	Annual	SEBC

No	Effects to be monitored	Indicator(s) to be used	Target	Suggested frequency of review/analysis of monitoring data/mitigation	Responsibility for undertaking monitoring
		most deprived 10% and 25% of wards in the country			
5	Effects on improving access to key services for all sectors of the population	Percentage of rural households within 15 minutes' walk of an hourly bus service	% Increase	Annual	SEBC
		Proportion of population with access to key local services e.g. GP, post office	% Increase	Annual	SEBC
6	Effects on offering everybody the opportunity for rewarding and satisfying employment	Unemployment rate – (%) unemployed persons	% Reduce	Annual	SEBC
7	Effects on meeting the housing requirements of the whole community	Homelessness Numbers	Reduce	Annual	SEBC
		Annual net dwelling completions	Proposed East of England annual target of housing completions for St Edmundsbury (Policy H1) between 2001 and 2021: 500	Annual	SEBC
		Affordable Housing completions	Policy H3 - Affordable Housing of the Replacement St Edmundsbury Borough Local Plan 2016: 40% affordable housing on: i) sites of 0.5+ ha or 15+ dwellings, in settlements of 3,000+	Annual	SEBC

No	Effects to be monitored	Indicator(s) to be used	Target	Suggested frequency of review/analysis of monitoring data/mitigation	Responsibility for undertaking monitoring
			ii) sites of 0.17+ ha or 5+ dwellings, in settlements of less than 3000		
		Special Needs Housing	Not identified	Annual	SEBC
		Provision for gypsy and traveller pitches	17 pitches by 2011 (The East of England Plan, a target for St Edmundsbury in Policy H4)		SEBC
		Average property price and Housing Affordability	Decrease	Annual	SEBC
8	Effects on improving the quality of where people live and encouraging community participation	% of residents who are happy with their neighbourhood as a place to live	Increase	Periodically	SEBC (Suffolk Speaks Survey)
		Change in amount of accessible natural green space	Increase in the amount of accessible natural green space by 5% by 2010	Periodically	SEBC (Suffolk Biological Records Office)
		Number of people involved in volunteer activities	Increase	Periodically	SEBC (NI 6 'Participation in regular volunteering')
9	Effects on improving water and air quality	Water quality in rivers	Improve	Annual	SEBC (Environment Agency)
		Groundwater quality	Improve	Annual	SEBC (Environment Agency)
		Have annual mean concentrations of any key air pollutants been	Zero exceedances	Annual	SEBC

No	Effects to be monitored	Indicator(s) to be used	Target	Suggested frequency of review/analysis of monitoring data/mitigation	Responsibility for undertaking monitoring
		exceeded?			
10	Effects on conserving soil resources and quality	Number and percentage of new dwellings completed on greenfield land	Decrease	Annual	SEBC
		Dwellings per hectare of net developable area	Recommended minimum guideline = 30 dwellings/hectare (PPG3)	Annual	SEBC
		Number of potential and declared contaminated sites returned to beneficial use	Increase	Annual	SEBC
11	Effects on using water and mineral resources efficiently, and re-use and recycle	Recycled aggregate production	Increase	Annual	SEBC
		Daily domestic water use (per capita consumption, litres) for St Edmundsbury	Achieving the equivalent of 3 stars under the Code for Sustainable Homes for water use (105litres/capita/day) is a desirable target for new homes	Annual	SEBC (Audit Commission)
12	Effects on reducing waste	Household and municipal waste produced	Year-on-year reduction	Annual	SEBC
		Tonnage / proportion of household (and municipal) waste recycled, and composted	Year-on-year increase	Annual	SEBC
13	Effects on reducing the effects of traffic on the environment	Traffic volumes in key locations	Decrease	Annual	SEBC
		Percentage of all new residential development taking place in major towns, other towns, and	Increase	Annual	SEBC



No	Effects to be monitored	Indicator(s) to be used	Target	Suggested frequency of review/analysis of monitoring data/mitigation	Responsibility for undertaking monitoring
		elsewhere			
		Percentage of journeys to work undertaken by sustainable modes	Increase	Annual	SEBC
		Percentage of schoolchildren travelling to school by sustainable modes	Increase	Annual	SEBC
		Car parking standards (the number of spaces per development)	Decrease	Annual	SEBC
14	Effects on reducing contributions to climate change	Consumption of electricity - Domestic use per consumer and total commercial and industrial use	Decrease	Annual	SEBC (DTI))
		Consumption of gas - Domestic use per consumer and total commercial /industrial use	Decrease	Annual	SEBC (DTI)
		GHG emissions by sector and per capita emissions - proportion and absolute quantity in tonnes per year	To reduce CO <sub>2</sub> emissions 80% by 2050 from a 1990 baseline figure (national target) <i>Source: UK Climate Change Act 2008</i>	Annual	SEBC (Defra Statistics on CO <sub>2</sub> emissions for local authority areas)
		Percentage of buildings achieving desired rating against national building standards such as Code for Sustainable Homes or BREEAM ('Very Good'/'Excellent')	Desirable targets: all new dwellings meeting Code level 3 by 2010, Code level 4 by 2013 and Code	Annual	SEBC

No	Effects to be monitored	Indicator(s) to be used	Target	Suggested frequency of review/analysis of monitoring data/mitigation	Responsibility for undertaking monitoring
		standard)	level 6 by 2016		
		1. Percentage of new development which sources a percentage of energy from low carbon or renewable sources: i. Onsite; ii. Offsite.	East of England targets 10% (2010); 17% (2020)	Periodically	SEBC
		Renewable energy generation: installed generating capacity.	Increase	Annual	SEBC
		Number of properties receiving grants to increase energy efficiency in their homes (e.g. from Carbon Emissions Reductions Target Scheme or the Warm Front Scheme)	Increase	Annual	SEBC
15	Effects on reducing vulnerability to climatic events	Flood Risk – Planning applications approved against Environment Agency advice	Compliance with Environment Agency advice	Annual	SEBC
		Properties at risk of flooding from rivers	Decrease/Maintain stable	Annual	SEBC (Environment Agency)
16	Effects on conserving and enhancing biodiversity and geodiversity	Change in number and area of designated ecological sites	No net loss	Annual	SEBC
		Condition of CWS	Improve	Periodically	SEBC (new National Indicator 197)
		Reported condition of ecological SSSIs	Meet the Public Service Agreement	Periodically	SEBC (Natural England)

No	Effects to be monitored	Indicator(s) to be used	Target	Suggested frequency of review/analysis of monitoring data/mitigation	Responsibility for undertaking monitoring
			targets		
		Achievement of Habitat and Species Action Plan targets	Compliance	Periodically	SEBC
		Development proposals affecting BAP habitats outside protected areas	Zero	Annual	SEBC
		Reported condition of geological SSSIs and RIGSS	Improve	Periodically	SEBC
17	Effects on conserving and enhancing areas of historical and archaeological importance	Number of listed buildings and buildings at risk	Decrease	Annual	SEBC (English Heritage)
		Area of historic parks and gardens	No net loss	Annual	SEBC (English Heritage)
		Number and area of Conservation Areas (CAs) and Article 4 directions	No net loss	Annual	SEBC (English Heritage)
		Number of Conservation Area Appraisals (CAAs) completed and enhancement schemes (in conservation areas) implemented	Increase	Annual	SEBC
		Number of Scheduled Ancient Monuments (SAMs) damaged as a result of development	Zero	Annual	SEBC (English Heritage)
		Percentage of development permissions with conditions requiring archaeological investigations prior to or during	Not identified	Annual	SEBC

No	Effects to be monitored	Indicator(s) to be used	Target	Suggested frequency of review/analysis of monitoring data/mitigation	Responsibility for undertaking monitoring
		development			
18	Effects on conserving and enhancing the quality and local distinctiveness of landscapes and townscapes	Number and percentage of new dwellings completed on previously developed land	Borough target of 40% from SEBC Replacement Local Plan PPG3: 60% on brownfield	Annual	SEBC
		Number of vacant dwellings	Decrease	Annual	SEBC
		Landscape condition specified in landscape character assessments	No reduction in quality or character	Periodically	SEBC (Suffolk Landscape Character Assessment)
19	Effects on achieving sustainable levels of prosperity and economic growth throughout the plan area	Take-up of URBAN employment floorspace (completions)	To maintain a supply of available land where appropriate and to encourage year-on-year employment development	Annual	SEBC
		Take-up of RURAL employment floorspace (completions)	To maintain a supply of available land where appropriate	Annual	SEBC
		Employment permissions and allocations (URBAN)	None identified	Annual	SEBC
		Employment permissions and allocations (RURAL)	None identified	Annual	SEBC
20	Effects on revitalising town	% Vacant units in town centres	Not exceed the	Annual	SEBC

No	Effects to be monitored	Indicator(s) to be used	Target	Suggested frequency of review/analysis of monitoring data/mitigation	Responsibility for undertaking monitoring
	centres		national average		
21	Effects on encouraging efficient patterns of movement in support of economic growth	Number of developments where a travel plan is submitted or is a condition of development	Increase	Annual	SEBC
		Percentage of journeys to work undertaken by sustainable mode	Increase	Annual	SEBC
		Number of farmers markets and farm shops	Increase	Annual	SEBC
22	Effects on encouraging and accommodating both indigenous and inward investment	Employment land availability (URBAN)	To maintain a supply of available land where appropriate	Annual	SEBC
		Employment land availability (RURAL)	To maintain a supply of available land where appropriate	Annual	SEBC

## 13. Conclusions

- 13.1 The Core Policies within the St Edmundsbury Core Strategy DPD meet to a large extent the range of sustainability objectives identified in the SA framework, on the whole achieving a balance of positive significant effects.
- 13.2 Recommendations have been made previously on earlier iterations of the policies through the SA and AA processes. Many of these recommendations have been taken forward and are reflected in the finalised version of the Core Strategy Policies, to ensure that they deliver sustainable development. Any remaining negative effects from development can be minimised to acceptable levels by undertaking Environmental Impact Assessment of projects or schemes arising from the implementation of the Core Strategy. The policies have also been changed as a result of earlier consultation exercises and more lately as a result of Inspector's comments.
- 13.3 Table 10.1 presents the set of the finalised policies included in the Core Strategy following Inspector's comments. On the whole, refinements to the policies following the Inspector's comments have further enhanced the sustainability performance of St Edmundsbury Core Strategy by providing clarification and further detail. However, in the case of Policy CS2, the expectation for BREEAM and Code for Sustainable Homes Levels above national requirements has been removed. The policy will still have positive environmental effects; however, these are less positive than predicted for previous iterations of the policy.

## 14. References

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