

**Babergh and Mid Suffolk District  
Councils**

**Joint Local Plan Part 2  
Sustainability Appraisal  
Scoping Report**

**Final report**

Prepared by LUC

August 2024

# Babergh and Mid Suffolk District Councils

## Joint Local Plan Part 2 Sustainability Appraisal Scoping Report

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# Contents

|   |           |  |           |
|---|-----------|--|-----------|
| <hr/>   |           |  |           |
| <b>Chapter 1</b>  |           | Policy context   | 49        |
| <b>Introduction</b>   | <b>1</b>  | Current baseline   | 53        |
| Babergh and Mid Suffolk Joint Local Plan: Part 1 and Part 2                                       | 2         | Future baseline and likely evolution without the Part 2 Joint Local Plan | 59        |
| Sustainability Appraisal and Strategic Environmental Assessment                                   | 2         | Key sustainability issues  | 59        |
| Habitats Regulations Assessments  | 3         | <hr/>  |           |
| Approach to Scoping   | 4         | <b>Chapter 6</b>   |           |
| Meeting the requirements of the SEA Regulations   | 4         | <b>Land and water resources</b>  | <b>66</b> |
| Structure of the Scoping Report   | 4         | Policy context   | 66        |
|   |           | Current baseline   | 71        |
|   |           | Future baseline and likely evolution without the Part 2 Joint Local Plan | 73        |
|   |           | Key sustainability issues  | 74        |
| <hr/>   |           |  |           |
| <b>Chapter 2</b>  |           | <b>Chapter 7</b>   |           |
| <b>Joint Local Plan Part 2 preparation process</b>  | <b>10</b> | <b>Climate change adaption and mitigation</b>                            | <b>79</b> |
| Background to the Joint Local Plan Part 2 preparation process                                     | 10        | Policy context   | 79        |
| Relationship between the Joint Local Plan Part 2 and the recently adopted Joint Local Plan Part 1 | 10        | Current baseline   | 87        |
| Relationship of the Joint Local Plan Part 2 with other plans and programmes                       | 11        | Future baseline and likely evolution without the Part 2 Joint Local Plan | 90        |
|   |           | Key sustainability issues  | 90        |
| <hr/>   |           |  |           |
| <b>Chapter 3</b>  |           | <b>Chapter 8</b>   |           |
| <b>Population, health and wellbeing</b>   | <b>21</b> | <b>Biodiversity</b>  | <b>93</b> |
| Policy context  | 21        | Policy context   | 93        |
| Current baseline  | 26        | Current baseline   | 95        |
| Future baseline and likely evolution without the Part 2 Joint Local Plan                          | 33        | Future baseline and likely evolution without the Part 2 Joint Local Plan | 96        |
| Key sustainability issues   | 34        | Key sustainability issues  | 96        |
| <hr/>   |           |  |           |
| <b>Chapter 4</b>  |           | <b>Chapter 9</b>   |           |
| <b>Economy</b>  | <b>39</b> | <b>Historic environment</b>  | <b>99</b> |
| Policy context  | 39        | Policy context   | 99        |
| Current baseline  | 42        | Current baseline   | 100       |
| Future baseline and likely evolution without the Part 2 Joint Local Plan                          | 46        | Future baseline and likely evolution without the Part 2 Joint Local Plan | 102       |
| Key sustainability issues   | 46        | Key sustainability issues  | 102       |
| <hr/>   |           |  |           |
| <b>Chapter 5</b>  |           |  |           |
| <b>Transport, air quality and noise</b>   | <b>49</b> |  |           |

|  |            |   |      |
|--|------------|---|------|
| <hr/>  |            | Table 4.1 Business stock by sector in 2016  | 42   |
| <b>Chapter 10</b>  |            | Table 4.2 Employee jobs by industry   | 44   |
| <b>Landscape</b>   | <b>106</b> | Table 4.3 Town Centre Vacancy Rates   | 45   |
| Policy Context   | 106        | Table 4.4 Percentage of work from home status   | 46   |
| Current baseline   | 108        | Table 4.5 Key sustainability issues and opportunities for the Joint Local Plan Part 2 to address them   | 46   |
| Future baseline and likely evolution without the Part 2 Joint Local Plan   | 109        | Table 5.1 Babergh commuting flows   | 56   |
| Key sustainability issues  | 110        | Table 5.2 Mid Suffolk commuting flows   | 57   |
| <hr/>  |            | Table 5.3: Key sustainability issues and opportunities for the Joint Local Plan Part 2 to address them  | 60   |
| <b>Chapter 11</b>  |            | Table 6.1: Key sustainability issues and opportunities for the Joint Local Plan Part 2 to address them  | 74   |
| <b>The SA framework and method of approach</b>   | <b>113</b> | Table 7.1 Carbon dioxide emissions in Babergh and Mid Suffolk Districts (shown as kilo tonnes)          | 88   |
| SA framework   | 113        | Table 7.2 Key sustainability issues and opportunities for the Joint Local Plan Part 2 to address them   | 90   |
| Site assessment criteria and assumptions   | 113        | Table 8.1: Key sustainability issues and opportunities for the Joint Local Plan Part 2 to address them  | 96   |
| Use of the SA Framework  | 120        | Table 9.1: Key sustainability issues and opportunities for the Joint Local Plan Part 2 to address them  | 102  |
| Spatial strategy options   | 121        | Table 10.1: Key sustainability issues and opportunities for the Joint Local Plan Part 2 to address them | 110  |
| <hr/>  |            | Table 11.1 SA framework for the Part 2 Joint Local Plan   | 115  |
| <b>Chapter 12</b>  |            | Table A.1 Institute of Highways and Transportation Walking distances                                    | A-1  |
| <b>Consultation and next steps</b>   | <b>122</b> | Table A.2 Walking distance assumptions  | A-2  |
| <hr/>  |            | Table A.3 Residential site assessment criteria and assumptions  | A-3  |
| <b>Appendix A</b>  |            | Table A.4 Amendments to site assessment criteria and assumptions since the Part 1 JLP                   | A-20 |
| <b>Criteria and assumptions to be applied in the SA of site options</b>  | <b>A-1</b> | <hr/>   |      |
| <hr/>  |            | <b>Table of Tables</b>  |      |
| Table 1.1 Meeting the Requirements of the SEA Regulations  | 5          | <hr/>   |      |
| Table 3.1 Babergh and Mid Suffolk: Ratio of workplace-based median house price to median earnings ratio  | 27         | <b>Table of Figures</b>   |      |
| Table 3.2 Babergh net residential completions by annual monitoring report year   | 28         | Figure 1.1 Location of Babergh and Mid Suffolk Plan area  | 9    |
| Table 3.3 Mid Suffolk net residential completions by annual monitoring report year   | 28         | Figure 3.1 Education and health facilities  | 36   |
| Table 3.4 Type of dwellings and number of households in Babergh and Mid Suffolk (excluding caravans and other mobile and temporary structures) | 29         | Figure 3.2 Indices of Multiple Deprivation (IMD)  | 37   |
| Table 3.5 Estimated rough sleeper count in BMSDC (Autumn)  | 30         | Figure 3.3 Open space   | 38   |
| Table 3.6 Summary of open spaces in Babergh and Mid Suffolk  | 32         | Figure 4.1 Employment sites and Enterprise Zones  | 48   |
| Table 3.7: Key sustainability issues and opportunities for the Joint Local Plan Part 2 to address them   | 34         | Figure 5.1 Travel to Work Areas   | 55   |
|  |            | Figure 5.2 Babergh commuting flows  | 56   |
|  |            | Figure 5.3 Mid Suffolk commuting flows  | 57   |
|  |            | Figure 5.4 Transport network  | 61   |
|  |            | Figure 5.5 Air Quality - NO <sub>2</sub>  | 62   |
|  |            | Figure 5.6 Air Quality - PM <sub>2.5</sub>  | 63   |



|  |     |
|--|-----|
| Figure 5.7 Air Quality - PM10                              | 64  |
| Figure 5.8 Noise pollution                                 | 65  |
| Figure 6.1 Minerals and waste sites                        | 76  |
| Figure 6.2 Agricultural Land Classification                | 77  |
| Figure 6.3 Watercourses and Source Protection Zones        | 78  |
| Figure 7.1 Flood Risk                                      | 92  |
| Figure 8.1 Designated biodiversity and geodiversity assets | 97  |
| Figure 8.2 Ancient Woodland Inventory                      | 98  |
| Figure 9.1 Listed buildings                                | 103 |
| Figure 9.2 Heritage assets                                 | 104 |
| Figure 9.3 Heritage assets at risk                         | 105 |
| Figure 10.1 National Landscapes                            | 111 |
| Figure 10.2 National Character Areas                       | 112 |
| Figure 11.1 SA effect symbols/colours                      | 120 |

# Chapter 1

## Introduction

**1.1** LUC was appointed in January 2024 to carry out the Sustainability Appraisal (SA) of the Babergh and Mid Suffolk Joint Local Plan Part 2 ('the Part 2 JLP'). The Part 2 JLP will build on the Part 1 JLP which was adopted by Babergh and Mid Suffolk District Councils (BMSDC) in November 2023. The Part 1 JLP was subject to SA by LUC during its preparation.

**1.2** SA is an assessment process designed to consider and report upon the significant sustainability issues and effects of emerging plans and policies, including their reasonable alternatives. SA iteratively informs the plan-making process by helping to refine the contents of such documents, so that they maximise the benefits of sustainable development and avoid, or at least minimise, the potential for adverse effects.

**1.3** The purpose of this SA Scoping Report is to provide the context for and determine the scope of the SA of the Part 2 JLP and to set out the assessment framework for undertaking the later stages of the SA.

**1.4** The Scoping Report contains chapters on a number of sustainability topics, each of which starts by setting out the policy context of the Part 2 JLP, before describing the current and likely future environmental, social and economic conditions in the Plan area. This contextual information has been used to identify the key sustainability issues and opportunities for the Part 2 JLP to address them. The key sustainability issues and opportunities have been used to validate the framework of SA objectives used previously to appraise the Part 1 JLP. The key changes to the method of approach relate to refinements to the criteria and assumptions used for appraising potential site allocations to be considered for inclusion in the Part 2 JLP, rather than the SA objectives themselves.

**1.5** The purpose of this consultation is to seek views on the proposed approach to the SA, in particular:

- Whether there are any additional plans, policies or programmes that are relevant to the SA that should be included.
- Whether the baseline information provided is robust and comprehensive and provides a suitable baseline for the SA of the Part 2 JLP.
- Whether there are any additional key sustainability issues relevant to the Plan area that should be included.

- Whether the proposed SA framework (**Chapter 11**) is appropriate and includes a suitable set of SA objectives.
- Whether the criteria and assumptions for appraising potential site allocations are appropriate for this stage of the SA process.

## Babergh and Mid Suffolk Joint Local Plan: Part 1 and Part 2

**1.6** Babergh and Mid Suffolk District Councils (BMSDC) are predominantly rural districts covering the centre of Suffolk, running from the boundary with Essex in the south to the boundary with Norfolk in the north. The Districts cover a combined area of over 1,400 square kilometres (540 square miles), with 199 parish and town councils and thriving market towns.

**1.7** The two District Council areas have a lot in common, such as the proportion of residents living in urban and rural areas and their comparable levels of deprivation, and subsequently face similar challenges and opportunities. These challenges and opportunities have drawn both authorities together administratively. Since 2011, both authorities have worked together to deliver Council services in response to the challenges facing local government.

**1.8** The Joint Local Plan (JLP) is set out in two parts. Part 1 of the JLP was adopted by Babergh and Mid Suffolk District Councils on 20<sup>th</sup> November 2023, and comprises:

- **Section A – Vision, Objectives, and Strategic Policies:** Establishes the overall strategy for the pattern, scale and quality of development.
- **Section B – Non-strategic Delivery Policies:** Detailed policies for the management and delivery of types of development.

**1.9** BMSDC have since committed to preparing Part 2 of the JLP. The Part 2 JLP will build on the Part 1 JLP and will set out the following:

- an up-to-date settlement hierarchy;
- a spatial distribution of any housing allocations;
- housing requirement figures for Neighbourhood Plan areas;
- site allocations;
- up-to-date settlement boundaries;

- open space designations with a relevant development management policy; and
- up-to-date development management policies to meet the needs of Gypsies, Travellers, Travelling Showpeople and Boat Dwellers and, if necessary, allocations to provide for this need.

**1.10** The location and extent of the Plan area, which incorporates both Council areas is shown in **Figure 1.1**.

### Extant plans for Babergh District

**1.11** The current Development Plan for Babergh consists of:

- Babergh and Mid Suffolk Joint Local Plan Part 1 (2023).
- Saved policies of the Core Strategy (2014) (the majority of the policies in the Core Strategy have been superseded by the JLP Part 1, however, five policies are 'saved').
- Saved policies of the Babergh Local Plan (2006) (the majority of the policies in the Local Plan have been superseded by the JLP Part 1, however, four policies are 'saved').
- Adopted Neighbourhood Plans.

### Extant plans for Mid Suffolk District

**1.12** For Mid Suffolk, the Development Plan consists of:

- Babergh and Mid Suffolk Joint Local Plan Part 1 (2023).
- Saved policies of the Stowmarket Area Action Plan (2013) (the majority of the policies in the Area Action Plan have been superseded by the JLP Part 1, however, 24 policies are 'saved').
- Adopted Neighbourhood Plans.

**1.13** The Part 2 JLP will replace the Saved Policies for both Districts and cover the period 2018 to 2037.

## Sustainability Appraisal and Strategic Environmental Assessment

**1.14** Under the amended Planning and Compulsory Purchase Act 2004<sup>1</sup>, SA is mandatory for Development Plan Documents. SA is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely environmental, social and economic

<sup>1</sup> The Planning and Compulsory Purchase Act 2004 was amended under the Environmental Assessments and Miscellaneous Planning (EU Exit) Regulations 2018

effects of the policies and proposals within a plan from the outset of its development.

**1.15** For these documents it is also necessary to conduct an environmental assessment in accordance with The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232)<sup>2</sup>. As set out in the explanatory Memorandum accompanying the Brexit amendments, they are necessary to ensure the law functions correctly following the UK's exit from the EU. No substantive changes are being made by this instrument to the way the SEA regime operates. Therefore, the SEA Regulations remain in force and it is a legal requirement for Babergh and Mid Suffolk's Joint Local Plan Part 2 to be subject to SA and SEA throughout its preparation. Furthermore, following the UK's exit from the EU, there were also a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which are transposed into UK law through Acts, Regulations and national-level policy. The UK has now fully left the EU and therefore EU Directives no longer apply to the UK.

**1.16** The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the national Planning Practice Guidance<sup>3</sup>), whereby users can comply with the requirements of the SEA Regulations through a single integrated SA process – this is the process that is being undertaken by Babergh and Mid Suffolk District Councils. From here on, the term 'SA' should therefore be taken to mean 'SA incorporating the requirements of the SEA Regulations'.

**1.17** The SA process comprises a number of stages, with scoping being Stage A as shown below.

**Stage A:** Setting the context and objectives, establishing the baseline and deciding on the scope.

**Stage B:** Developing and refining options and assessing effects.

**Stage C:** Preparing the Sustainability Appraisal Report.

**Stage D:** Consulting on the Local Plan and the SA Report.

**Stage E:** Monitoring the significant effects of implementing the Local Plan.

**1.18** On 26<sup>th</sup> October 2023, the Levelling-up and Regeneration Bill received Royal Assent and became an Act of Parliament<sup>4</sup>. The Act sets out in detail the Government's proposals for reforming the planning system. Amongst other things, the Act sets the stage for the reform of the current system of strategic environmental assessments, which will be replaced by "Environmental Outcomes Reports" (EORs) designed to streamline the process for identifying and assessing the environmental impacts of plans and projects. The specific requirements will be set out in forthcoming legislation, along with information about transition arrangements but for now, the requirement for SEA remains, as set out in existing legislation. Any changes to the legal framework for carrying out SA/SEA will be addressed as appropriate as the Part 2 JLP is prepared.

## Habitats Regulations Assessments

**1.19** The requirement to undertake Habitats Regulations Assessment (HRA) of land-use plans was confirmed by the amendments to The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007<sup>5</sup>. The currently applicable version is The Conservation of Habitats and Species Regulations 2017, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019<sup>6</sup> (hereafter referred to as the "Habitats Regulations"). When preparing a land-use plan, the competent authority is therefore required by law to carry out an HRA. The competent authority can commission consultants to undertake HRA work on its behalf which is then reported to and considered by the competent authority.

**1.20** The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site. The competent authority will consider the HRA and may only progress the land-use plan if it considers that it will not adversely affect the integrity of any European site or have a significant effect on qualifying habitats or species for which the European sites are designated, or if Imperative Reasons of Overriding Public Interest (IROPI) are identified.

<sup>2</sup> *The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232)*

<sup>3</sup> Ministry of Housing, Communities and Local Government (last updated 2020) Planning Practice Guidance: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

<sup>4</sup> Levelling-up and Regeneration Act 2023

<sup>5</sup> The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 (2007) SI No. 2007/1843. TSO (The Stationery Office), London

<sup>6</sup> The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), TSO (The Stationery Office), London

**1.21** The HRA will be undertaken separately but the findings will be taken into account in the SA where relevant (for example to inform judgements about the likely effects of potential development locations on biodiversity).

## Approach to Scoping

**1.22** There are five tasks involved at the Scoping Stage:

**Stage A1:** Setting out the policy context for the SA of the Babergh and Mid Suffolk Part 2 JLP (i.e. key government policies and strategies that influence what the Local Plan and the SA needs to consider).

**Stage A2:** Setting out the baseline for the SA of the Babergh and Mid Suffolk Part 2 JLP (i.e. the current and likely future environmental, social and economic conditions in Babergh and Mid Suffolk).

**Stage A3:** Drawing on A1 and A2, identify the particular sustainability problems and/or opportunities ('issues') that the Part 2 JLP and SA should address.

**Stage A4:** Drawing on A1, A2 and A3, develop a framework of SA objectives and assessment criteria to appraise the constituent parts of the Part 2 JLP in isolation and in combination.

**Stage A5:** Consultation on the scope of the SA.

**1.23** This Scoping Report fulfils the requirements set out above with a view to establishing the likely significant effects of constituent parts of the Part 2 JLP in isolation and in combination. In accordance with national Planning Practice Guidance (PPG), published online by the Government, the Scoping Report should be proportionate and relevant to the Babergh and Mid Suffolk Part 2 JLP, focussing on what is needed to identify and assess the likely significant effects.

## Meeting the requirements of the SEA Regulations

**1.24** **Table 1.1** below signposts the relevant sections of the Scoping Report that are considered to meet the SEA Regulations requirements (the remainder will be met during subsequent stages of the SA of the Babergh and Mid Suffolk Part 2 JLP). This table will be included in the full SA Report at each stage of the SA to show how the requirements of the SEA Regulations have been met through the SA process.

## Structure of the Scoping Report

**1.25** This chapter describes the background to the production of the Babergh and Mid Suffolk Part 2 JLP and the requirement to undertake SA and other assessment processes. The remainder of this Scoping Report is structured around a set of SA topic areas designed to draw out the full

range of possible sustainability effects generated by the Babergh and Mid Suffolk Part 2 JLP, including all the SEA topics listed in Schedule 2 of the SEA Regulations.

**1.26** **Chapter 2** provides background on the Babergh and Mid Suffolk Part 2 JLP and what consultation has been undertaken on it. It also describes the relationship of the Babergh and Mid Suffolk Part 2 JLP with other plans and programmes. Each of the subsequent chapters set out the policy context and baseline for each SA subject area. The subject area chapters are as follows:

- **Chapter 3:** Population, health and wellbeing.
- **Chapter 4:** Economy.
- **Chapter 5:** Transport, air quality and noise.
- **Chapter 6:** Land and water resources.
- **Chapter 7:** Climate change adaptation and mitigation.
- **Chapter 8:** Biodiversity.
- **Chapter 9:** Historic environment.
- **Chapter 10:** Landscape.

**1.27** **Chapters 3 to 10** highlight the key sustainability issues for the Babergh and Mid Suffolk Part 2 JLP area under each subject area, and also set out their likely evolution without the Part 2 JLP.

**1.28** **Chapter 11** sets out the SA framework and the proposed method of approach.

**1.29** **Chapter 12** summarises the consultation questions on the SA Scoping Report and sets out next steps.

**1.30** In addition, there is one appendix to the SA Scoping Report:

- **Appendix A** presents the proposed criteria and assumptions for carrying out the SA of potential site allocations.



Table 1.1 Meeting the Requirements of the SEA Regulations

| SEA Regulations' Requirements  | Covered in this Scoping Report?   |
|--|---|
| Environmental Report   |   |
| <p>Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation. The report shall identify, describe and evaluate the likely significant effects on the environment of:</p> <ul style="list-style-type: none"> <li>■ implementing the plan or programme; and</li> <li>■ reasonable alternatives taking into account the objectives and geographical scope of the plan or programme.</li> </ul> <p>(Regulation 12(1) and (2) and Schedule 2).</p> | <p>The full SA Report produced to accompany BMSDC's Joint Local Plan Part 2 will constitute the 'environmental report' as well and will be produced at a later stage in the SA process.</p> |
| <p>An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.</p>  | <p>These requirements are addressed in this SA Scoping Report.</p>  |
| <p>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.</p>  |   |
| <p>The environmental characteristics of areas likely to be significantly affected.</p>   |   |
| <p>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 on the conservation of wild birds and the Habitats Directive.</p>  |   |
| <p>The environmental protection, objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.</p>  |   |
| <p>The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive effects, and secondary, cumulative and synergistic effects, on issues such as:</p> <ul style="list-style-type: none"> <li>(a) biodiversity;</li> <li>(b) population;</li> <li>(c) human health;</li> <li>(d) fauna;</li> <li>(e) flora;</li> <li>(f) soil;</li> <li>(g) water;</li> <li>(h) air;</li> <li>(i) climatic factors;</li> <li>(j) material assets;</li> <li>(k) cultural heritage, including architectural and archaeological heritage;</li> <li>(l) landscape; and</li> </ul>       | <p>Requirement will be met at a later stage in the SA process. This SA Scoping Report describes the method by which significant effects will be identified.</p>                             |

| SEA Regulations' Requirements  | Covered in this Scoping Report?   |
|--|---|
| (m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l).   |   |
| 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.  | Requirement will be met at a later stage in the SA process.   |
| 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.   | Requirement will be met at a later stage in the SA process.   |
| A description of the measures envisaged concerning monitoring in accordance with regulation 17.  | Requirement will be met at a later stage in the SA process.   |
| A non-technical summary of the information provided under paragraphs 1 to 9.   | Requirement will be met at a later stage in the SA process.   |
| <p>The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of:</p> <p>current knowledge and methods of assessment;</p> <p>the contents and level of detail in the plan or programme;</p> <p>the stage of the plan or programme in the decision-making process; and</p> <p>the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.</p> <p>(Regulation 12 (3))</p>  | This SA Scoping Report and the Environmental Report will adhere to this requirement.  |
| <b>Consultation</b>  |   |
| <p>When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible authority shall consult the consultation bodies.</p> <p>(Regulation 12(5))</p>   | This SA Scoping Report will be published for consultation with the three statutory bodies (the Environment Agency, Historic England and Natural England). |
| <p>Every draft plan or programme for which an environmental report has been prepared in accordance with regulation 12 and its accompanying report ("the relevant documents") shall be made available for the purposes of consultation in accordance with the following provisions of this regulation.</p> <p>As soon as reasonably practical after the preparation of the relevant documents, the responsible authority shall:</p> <p>send a copy of those documents to each consultation body;</p> <p>take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority's opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental</p> | Public consultation on the Joint Local Plan Part 2 and accompanying SA Reports will take place as the Joint Local Plan Part 2 develops.                   |

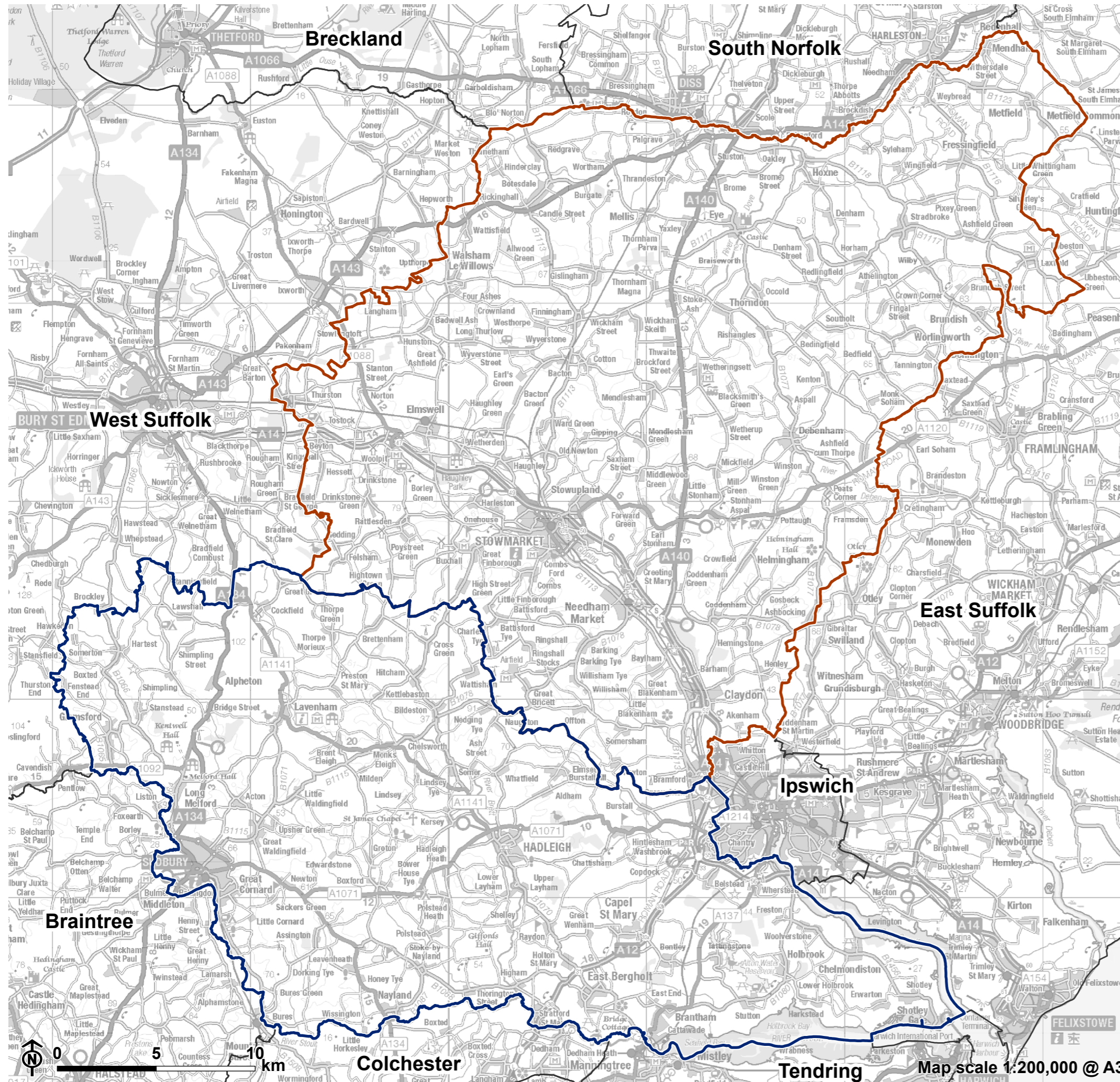
| SEA Regulations' Requirements  | Covered in this Scoping Report?   |
|--|---|
| <p>Assessment of Plans and Programmes Directive (“the public consultees”);</p> <p>inform the public consultees of the address (which may include a website) at which a copy of the relevant documents may be viewed, and the period within which, opinions must be sent.</p> <p>The period referred to in paragraph (2) (d) must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents.</p> <p>(Regulation 13 (1), (2), and (3))</p>   |   |
| <p>Where a responsible authority, other than the Secretary of State, is of the opinion that a plan or programme for which it is the responsible authority is likely to have significant effects on the environment of another Member State, it shall, as soon as reasonably practicable after forming that opinion:</p> <p>notify the Secretary of State of its opinion and of the reasons for it; and</p> <p>supply the Secretary of State with a copy of the plan or programme concerned, and of the accompanying environmental report.</p> <p>(Regulation 14 (1))</p>   | <p>Unlikely to be relevant to the Joint Local Plan Part 2, as there will be no effects beyond the UK.</p> |
| <p>Taking the environmental report and the results of the consultations into account in decision-making (relevant extracts of Regulation 16)</p>   |   |
| <p>As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall:</p> <p>make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge.</p> <p>(Regulation 16(1))</p>   | <p>Requirement will be met at a later stage in the SA process.</p>  |
| <p>As soon as reasonably practicable after the adoption of a plan or programme:</p> <p>the responsible authority shall inform (i) the consultation bodies; (ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and (iii) where the responsible authority is not the Secretary of State, the Secretary of State,</p> <p>that the plan or programme has been adopted, and a statement containing the following particulars:</p> <p>how environmental considerations have been integrated into the plan or programme;</p> <p>how the environmental report has been taken into account;</p> <p>how opinions expressed in response to: (i) the invitation in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;</p> | <p>Requirement will be met at a later stage in the SA process.</p>  |

| SEA Regulations' Requirements   | Covered in this Scoping Report?   |
|---|---|
| <p>how the results of any consultations entered into under regulation 14(4) have been taken into account;</p> <p>the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</p> <p>the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.</p> |   |
| <b>Monitoring</b>   |   |
| <p>The responsible authority shall monitor the significant effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.</p> <p>(Regulation 17(1))</p>  | <p>Requirement will be met after adoption of the new Joint Local Plan Part 2.</p> |





Figure 1.1: Location of Babergh and Mid Suffolk Plan area



- Mid Suffolk District
- Babergh District
- Neighbouring local authority



## Chapter 2

### Joint Local Plan Part 2 preparation process

#### Background to the Joint Local Plan Part 2 preparation process

**2.1** Babergh and Mid Suffolk's Joint Local Plan was originally prepared as a single plan, which was submitted for Examination in March 2021. During Examination, the Inspectors raised concern over the robustness of the housing site selection process and relationship to the spatial strategy. Consequently, to enable the Plan to be found sound, BMSDC removed the residential allocations from the Joint Local Plan and retained the settlement boundaries shown on their current policies map. They referred to this as the Joint Local Plan Part 1 and it was adopted in November 2023.

**2.2** The forthcoming Joint Local Plan Part 2, to which this SA Scoping Report relates, is expected to include the spatial strategy, settlement hierarchy and any necessary housing allocations as well as settlement boundaries, open space designations, and meeting the needs of Gypsies, Travellers and Travelling Showpeople, and Houseboat Dwellers.

#### Relationship between the Joint Local Plan Part 2 and the recently adopted Joint Local Plan Part 1

**2.3** The Joint Local Plan Part 1 (2023) covers the Plan period 2018 to 2037, and is based on the following key priorities:

- enabling sustainable economic growth;
- enhancing and protecting the environment;
- delivering appropriate housing through existing commitments and windfall development; and
- supporting strong and healthy communities and delivering infrastructure.

**2.4** The Part 1 JLP sets out the development management policies for the Districts, which help determine day to day planning applications through specific standards and policy criteria. The Part 1 JLP also contains some strategic policies which set out the overall strategy for the pattern, scale and quality of development. In Babergh District, the JLP Part 1 seeks to deliver a minimum of 7,904 net additional dwellings (416 dwellings per annum) over the Plan period. In Mid Suffolk District, the JLP Part 1 seeks to deliver a minimum of 10,165 net additional dwellings (535 dwellings per annum) over the Plan period. Although the JLP Part 1 does not allocate any

sites to meet this need, there is an unusual situation whereby the vast majority of the Plan area's housing requirement is provided for by existing dwelling completions, sites under construction, sites with full or outline planning permission, sites with a resolution to grant planning permission subject to S106 agreements, allocations in made Neighbourhood Plans and an allowance for windfall dwellings. Therefore, housing delivery is unlikely to be dependent on the allocation of housing sites. As mentioned already, the forthcoming Part 2 JLP to which this SA Scoping Report relates, is expected to include any necessary housing allocations. Subsequently, the Part 1 JLP in combination with the Part 2 JLP will ensure the housing need is met, including any affordable housing needs.

**2.5** With regard to economic development, the Part 1 JLP supports and encourages economic growth by protecting designated strategic employment sites and supporting the regeneration at Brantham and the Former Sproughton Sugar Beet Factory sites. Retail uses are also supported and protected, in addition to tourism and leisure development.

## Relationship of the Joint Local Plan Part 2 with other plans and programmes

**2.6** It is a requirement of the SEA Regulations to describe the relationship of the plan to be subject to SA/SEA with other relevant plans and programmes.

**2.7** This section therefore describes, firstly, other plans that will form part of the development plan for Babergh and Mid Suffolk, and, secondly, the current status of other plans and programmes that may combine with the Part 2 JLP to give rise to cumulative effects, such as the Part 1 JLP, the Local Plans of neighbouring authorities and Nationally Significant Infrastructure Projects.

### Neighbourhood Development Plans

**2.8** Neighbourhood Development Plans (NDPs), once adopted, form part of the development plan for a local authority area.

**2.9** As of July 2024, there are 42 'made' (adopted) NDPs within BMSDC. These are as follows:

- **Acton Neighbourhood Plan 2022-2037 (2024):** New development will be focused within the existing defined settlement boundaries for Acton and Newman's Green, and new development will only be supported where it satisfies identified local needs and is of a scale that is compatible with the level of services and facilities in the village.
- **Aldham Neighbourhood Plan 2018-2036 (2020):** Provision has been made for around 15 dwellings. The Neighbourhood Plan also contains a policy on recreational disturbance mitigation, to avoid adverse in-combination recreational disturbance effects on European sites. The Neighbourhood Plan is currently under review.
- **Assington Neighbourhood Plan 2018-2036 (2022):** The Neighbourhood Plan sets out that a minimum of 38 new homes, including outstanding planning permissions, will be built in Assington between 2018 and 2036. The plan seeks to prioritise smaller units and affordable housing. The Neighbourhood Plan states that the Parish Council will work with Babergh and Mid Suffolk District Councils to establish a Conservation Area, which will mirror the Assington Special Character Area.
- **Bentley Neighbourhood Plan 2018-2037 (2022):** The Neighbourhood Plan states that residential development proposals will be permitted subject to them maintaining and enhancing the quiet and tranquil character of the village and its setting.
- **Beyton Neighbourhood Plan 2023-3037 (2024):** The Neighbourhood Plan provides for around 37 additional dwellings between 2018 and 2037. The Plan specifically allocates two sites to help deliver this number of dwellings (some will be met through existing planning permissions and windfall sites). In addition, proposals for the conversion of redundant or disused agricultural barns outside the Settlement Boundary into dwellings will be supported in certain circumstances.
- **Botesdale & Rickinghall Neighbourhood Plan 2017-2036 (2020):** The Neighbourhood Plan provides for a minimum of 200 dwellings to be developed up to 2036. The Neighbourhood Plan sets out policies relating to the design of development.
- **Boxford Neighbourhood Plan 2021-2037 (2022):** The Neighbourhood Plan sets out that a minimum of 13 dwellings will be accommodated over the plan period in Boxford. New development in Boxford is to be focused within the defined settlement boundaries of Boxford village, Stone Street and Calais Street. Land has been allocated for approximately seven new dwellings and a new car park at Stone Street Road. It also includes policies that address the design of new development in the plan area.
- **Chelmondiston Neighbourhood Plan (Chelpin Plan) 2020-2036 (2022):** The Neighbourhood Plan sets out that new development in Chelmondiston will be focused in the defined settlement boundaries for Chelmondiston, Pin Mill and Lings Lane. All new development must respond positively to the key attributes of the neighbourhood area and the key local design features of the settlement within which it is located.

- **Debenham Neighbourhood Plan 2016-2036 (2019):** The Neighbourhood Plan sets out that around 316 new dwellings can be developed in Debenham at the below listed sites. The Neighbourhood Plan also identifies an anticipated windfall allowance of 54 dwellings. It is currently under review.
  - Land north of Ipswich Road (60-140 dwellings).
  - Land south of Low Road (15-35 dwellings).
  - Land east of Aspsall Road (37-87 dwellings).
- **Diss & District Neighbourhood Plan 2021-2038 (2023):** The Neighbourhood Plan sets out that during the Plan period around 434 new homes will be developed across Diss and District. With regard to the Suffolk part of the neighbourhood area, the minimum housing requirement is set at 64 new homes. The Plan includes proposals for the regeneration of the Waveney Quarter, promoting the growth of leisure and community facilities.
- **Drinkstone Neighbourhood Plan 2018-2036 (2020):** The Neighbourhood Plan provides for ten additional dwelling to be built in the period 2016 to 2036. The following sites are allocated for housing development:
  - Land west of The Street (one dwelling);
  - Abbots Lodge (one dwelling);
  - Adjacent to Greyfriars, Rattlesden (one dwelling);
  - Briar Cottage, Gedding Road (one dwelling); and
  - Land West of Shortgate, Beyton Road (two dwellings).
- **East Bergholt Neighbourhood Plan 2015-2030 (2016):** A minimum of 86 new homes will be developed in East Bergholt, within or immediately adjacent to the village Built Up Area Boundaries. The Plan seeks to establish a Community Land Trust as a means of delivering homes, including affordable homes, with up to one third of new homes being designed to meet the needs of older people. The East Bergholt Neighbourhood Plan is currently under review.
- **Elmswell Neighbourhood Plan 2022-2037 (2022):** The Neighbourhood Plan does not provide details on the amount and future location of any further housing growth in Elmswell. However, it identifies nine Local Green Spaces to be safeguarded as well as setting out policy relating to a number of topic areas including the protection of open spaces, sport and recreation facilities. The plan also includes policy for the protection of important identified views that must not be adversely affected by development. The Plan is currently under review.
- **Elmswell Neighbourhood Plan 2022-2037 (2023):** The Neighbourhood Area will accommodate development commensurate with its designation as a Key Service Centre in the Mid Suffolk Core Strategy and a Core Village in the Joint Babergh and Mid Suffolk Local Plan. The focus for new development will be within the Settlement Boundaries, as defined on the Policies Map. The Neighbourhood Plan also supports the retention and development of existing employment and other business uses.
- **Eye Neighbourhood Plan 2018-2036 (2021):** The Neighbourhood Plan provides for around 716 homes to be developed in the plan area between 2018 and 2036. Residential development sites in the plan area are to provide for 163 affordable homes and 70 sheltered homes. Policy is included in the Plan to require that within the settlement boundary, development proposals should conserve and where possible enhance the conservation area and its setting and should respect local distinctiveness.
- **Fressingfield Neighbourhood Plan 2018-2036 (2020):** The Neighbourhood Plan is set out to address a minimum housing figure of 56 dwellings, with committed development already totalling 51 dwellings. The focus of additional new development will be expected to take place within the settlement boundary. Encouragement will be given to a wide range of types of housing that meet local needs to enable a mixed and inclusive community. Support is provided through the Neighbourhood Plan for the development of the 'Fressingfield Hub' within the parish during the plan period, to provide a multi-purpose facility for the community.
- **Great Waldingfield Neighbourhood Plan 2018-2037 (2023):** The Neighbourhood Plan includes policy that sets out a general presumption in favour of housing development in the form of small brownfield "windfall" sites and infill plots of one or two dwellings to ensure that housing meets specific needs. It also includes policies to address a number of topic areas including the natural environment, historic environment, design, services and facilities, highways and movement and employment and business.
- **Haughley Parish Neighbourhood Plan 2016-2036 (2019):** Three sites have been identified in the plan for residential development, as listed below. Commercial and industrial developments will also be supported within the Neighbourhood Plan area, where they are situated on brownfield sites. Policies are also included in the plan on the design of new development, in addition to the conservation and enhancement of biodiversity.

- Land east of King George V Playing Field (98 new homes)
- Land at Station Road, east of Millfields (18-31 new homes)
- Land west of Fishponds Way (25-50 new homes)
- **Holbrook Neighbourhood Plan (2023):** The Neighbourhood Plan provides for a minimum of 65 new dwellings over the Plan period to 2037. The edges of the Parish have a number of significant constraints and landscape sensitivities which require development to be focused within the settlement boundaries. As such, small infill developments are considered to be the most appropriate method to ensure sustainable development.
- **Hoxne Neighbourhood Plan 2022-2037 (2024):** The Neighbourhood Plan for around 66 new dwellings over the plan period, which includes 13 dwellings already granted planning permission, but which are yet to be completed. According to the Plan, all new development proposals will be expected to deliver a mix of house types and sizes.
- **Lavenham Neighbourhood Plan 2016-2031 (2016):** This Neighbourhood Plan states that residential development proposals will be permitted subject to them being located within or adjacent to the built-up area of Lavenham, and that development must respect views in and out of the village. A change of use to the existing school site to meet local retirement and care home needs will be supported, and a number of open spaces and recreation areas have been safeguarded. The Retail Core Area will also be protected and enhanced. The Lavenham Neighbourhood Plan is currently under review.
- **Lawshall Neighbourhood Plan 2021-2037 (2024):** The Neighbourhood Plan provides for around 26 additional dwellings to be developed between 2021 and 2037. This growth will be met through the completion of existing planning permissions and the development of small brownfield windfall sites and infill plots of one of two dwellings within the Settlement Boundaries.
- **Laxfield Neighbourhood Plan 2018-2036 (2022):** The Neighbourhood Plan provides for around 110 additional dwellings to be developed in the Plan area between 2018 and 2036. This level of housing development is to be met partly through the allocation of Land off Cullingford Close. The Plan sets out a community action to establish a Community Land Trust as a means of delivering homes, including affordable homes.
- **Leavenheath Neighbourhood Plan 2022-2037 (2023):** The Neighbourhood Plan sets out that a minimum of 40 new homes will be provided up to 2037. Housing development will be supported within or immediately adjacent to the settlement boundaries of Harrow Street, High Road and Honey Tye.
- **Little Cornard Neighbourhood Plan (2022):** The Neighbourhood Plan sets out that the area of Cornard Mere and Great Cornard Country Park is one of the most important environmental assets in the wider area. It also identifies that the Mere is designated a Site of Special Scientific Interest (SSSI) and is therefore of national importance. These areas are protected by policy in the Neighbourhood Plan, and acceptable development proposals should maintain and enhance pedestrian connectivity between Cornard Mere and Great Cornard Country Park. Furthermore, all development proposals are expected by policy in the plan, to conserve the scenic beauty of the parish.
- **Little Waldingfield Neighbourhood 2018-2037 (2022):** This Plan provides for around 10 additional dwellings to be developed in the plan area between 2018 and 2036. Two sites have been identified for housing development. These are:
  - Land adjoining The Swan PH, The Street (1 dwelling and 1 conversion - Babergh DC ref DC/19/01283);
  - Land at The Grange, The Street (1 dwelling - Babergh ref DC/20/00899).
- **Long Melford Neighbourhood Plan (2022):** The Plan provides for around 444 dwellings to be built over the period 2018 to 2037. The Plan has identified a number of sites to be allocated:
  - Two brownfield sites in the centre of the village and one further central residential site;
  - A site at the southern end of the village potentially suited to a mixed development.
  - A greenfield site at the north end of the village, and
  - A greenfield site at the south of the village that will complement existing linear development.
- **Mendlesham Neighbourhood Plan 2018-2037 (2022):** A minimum of 161 new homes are set out in the Neighbourhood Plan to be provided up to 2037. The Plan is clear that any significant increase on this figure will need to demonstrate that existing local services infrastructure will be able to cope or, if not, that appropriate measures will be provided as part of development proposals. The Neighbourhood Plan requires development to include a suitable contribution of, or contribution towards, functional green areas for recreational purposes.

- **Needham Market Neighbourhood Plan 2020-2037 (2022):** The Needham Market Neighbourhood Plan supports the delivery of a minimum of 512 homes during the Plan period up to 2037 in accordance with requirements of the emerging JLP. It sets out policies to support the provision of an appropriate mix of housing the plan area, the achievement of good design and layout at new developments, the successful functioning of the town centre, the provision of required levels of infrastructure and protection of the natural environment. Policy to focus employment generating development towards the Lion Barn Estate is also included.
- **Newton Neighbourhood Plan 2018-2037 (2021):** The Neighbourhood Plan provides for at least 23 new homes by 2037. Within the settlement boundary, there is a general presumption in favour of residential development in the form of infill and redevelopment sites. Four Local Green Spaces have been safeguarded.
- **Redgrave Neighbourhood Plan 2018-2037 (2022):** The Neighbourhood Plan provides for at least 11 new homes by 2037. A site of approximately 0.53 hectares at Churchway is allocated for new housing development of approximately eight dwellings. Furthermore, The Neighbourhood Plan requires that new housing development will only be permitted if it can be demonstrated that sufficient supporting infrastructure (physical, medical, educational, green and digital) is available to meet the needs of that development.
- **Sproughton Neighbourhood Plan 2018-2037 (2023):** The Neighbourhood Plan sets out the spatial strategy for Sproughton whereby development proposals within the settlement boundaries will be supported in principle. Policy is included to require that in all housing developments of ten or more homes, at least 60% shall be three-bedroomed homes unless it can be demonstrated that this is not possible. The Plan also supports high-quality and eco-friendly development design, and seeks to reduce the environmental impact of new buildings.
- **Stowupland Neighbourhood Development Plan 2016-2036 (2019):** This Neighbourhood Plan provides for at least 203 new homes by 2036. Within the settlement boundaries for Stowupland and Saxham Street, there is a general presumption in favour of residential development in the form of infill and redevelopment sites, and small groups of approximately ten dwellings. Proposals for development on sites of one hectare or more on the best and most versatile agricultural land will not be supported, unless it cannot be demonstrated that land of a poorer quality is not available. Green and blue infrastructure will be protected and strengthened.
- **Stadbroke Neighbourhood Plan 2016-2036 (2019):** This Neighbourhood Plan provides for a minimum of 219 dwellings to be built in the period 2016 to 2036 and the below listed sites are allocated for development. The Neighbourhood Plan also sets out detailed design principles and encourages the use of Sustainable Drainage Systems (SuDS). The expansion of education and health capacity within the village is also promoted. The Neighbourhood Plan is currently under review.
  - Land north of Laxfield Road (32-45 dwellings)
  - Land east of Farriers Close (25-35 dwellings)
  - Land south of New Street (43-60 dwellings)
  - Land south of Mill Lane (approximately 75 dwellings)
  - Land at Grove Farm (44 dwellings)
- **Stutton Neighbourhood Plan 2022-2037 (2023):** The Neighbourhood Plan provides for at least 65 new homes up to 2037. The majority of these will be delivered within the settlement boundary. The Plan emphasises the importance of and prioritises affordable housing provision. Policy is also included to set out the approach to the design of new development and a Stutton specific Design Checklist is included in support of this.
- **Thorndon Neighbourhood Plan 2018-2036 (2022):** The Neighbourhood Plan provides for a minimum of 55 dwellings to be developed up to 2036. The Neighbourhood Plan also sets out policy to address the design of new development.
- **Thurston Neighbourhood Development Plan 2018-2036 (2019):** New development in Thurston Parish shall be focused within the settlement boundary of Thurston Village. All housing proposals of five or more units must reflect Thurston's needs across all tenures, including the needs of older people.
- **Walsham le Willows Neighbourhood Plan 2023-2037 (2023):** The Neighbourhood Plan requires that new development in Walsham le Willows must respect the local distinctiveness and character of the parish and seek to enhance its quality. The plan sets out a small number of housing allocations. These are:
  - LA091 – Allocation: Land west of Wattisfield Road, Walsham le Willows Size of site – 2.7ha (approximately 60 dwellings with associated infrastructure).
  - LA092 – Allocation: Land east of Wattisfield Road, Walsham le Willows Site Size 0.53 (approximately 22 dwellings with associated infrastructure).



- **Whatfield Neighbourhood Plan 2018-2037 (2022):** The Neighbourhood Plan accords with the total housing requirement for Whatfield of one dwelling, as set out in the JLP. The Plan states that within the defined settlement boundary for Whatfield, development proposals for windfall development in the form of individual dwellings or small groups of houses up to five dwellings will be supported, subject to a number of criteria being met. The Neighbourhood Plan contains additional policies relating to the protection of landscape setting, community facilities and housing mix. It also contains an area specific Design Guide, prescribing design styles, materials and layouts for new developments.
- **Wherstead Neighbourhood Plan 2018-2037 (2023):** The spatial strategy set out in the Neighbourhood Plan states new development will be supported in principle within the settlement boundaries, Wherstead Park Strategic Employment Site, existing employment sites or land with planning permission for major development. A large extent of the Parish is within the Suffolk Coast and Heaths National Landscape. The Plan is clear that new development should have regard to the character and setting of the National Landscape. The Plan therefore includes a number of policies to protect the National Landscape, important views and dark skies as well as habitats and corridors.
- **Wilby Neighbourhood Plan 2018-2036 (2021):** The Neighbourhood Plan provides for around 16 dwellings to be developed in the Plan area between April 2018 and March 2036 of which 11 dwellings are already committed. To help meet this target the plan allocates a site for five dwellings at the Land East of Stradbroke Road. Policy in the plan requires that all new housing developments should reflect Wilby's local distinctiveness and character and should seek to enhance its quality.
- **Woolpit Neighbourhood Plan (2022):** The Neighbourhood Plan sets out that development is to be supported in Woolpit where it is within the capacity of the existing infrastructure and road layout of the village, or provides the necessary additional capacity; is well related to the existing pattern of development; and preserves or enhances the character and appearance of the Conservation Area in the village. The plan also includes policy that identifies the Land south of Old Stowmarket Road as an existing commitment for up to 120 homes.

**2.10** As of July 2024, there are 27 Neighbourhood Development Plans in progress within BMSDC:

- Aldham;
- Bacton;
- Badwell Ash;
- Battisford;
- Baylham;
- Brettenham;
- Bures;
- Capel St Mary;
- Chilton;
- Copdock & Washbrook;
- Debenham;
- East Bergholt;
- Edwardstone;
- Elmsett;
- Glemsford;
- Great Cornard;
- Groton;
- Hadleigh;
- Hartest;
- Hitcham;
- Lavenham;
- Occold;
- Shimpling;
- Stradbroke;
- Stoke by Nayland;
- Tattlingstone; and
- Wetheringsett cum Brockford.

**Suffolk County Council**

**Minerals and Waste Local Plan**

**2.11** The Suffolk Minerals & Waste Local Plan (SWMLP) was adopted by Suffolk County Council in July 2020. The SMWLP allocates nine sites for the extraction of sand and gravel sufficient to supply 9.300 Mt over the Plan period to the end of 2036. Policy also states that the County Council will seek to maintain a landbank of permitted reserves of at least seven years based upon the average of the last ten years' sales.

**2.12** Although there are significant quantities of Local Authority Collected Waste, Commercial & Industrial Waste, Construction, Demolition & Excavation Waste, and Hazardous

Waste managed within Suffolk, the Suffolk Waste Study concluded that there is no immediate shortfall in waste management capacity for these waste streams. Therefore, the SMWLP states that applications for new facilities would be considered in the normal way.

### Local Transport Plan

**2.13** Suffolk Local Transport Plan covers the period 2011 to 2031. It is in two parts:

- Part 1: Strategy.
- Part 2: Implementation Plan.

**2.14** Within the Joint Local Plan Part 2 period, the County Council hopes to see the delivery of a number of strategic transport improvements including:

- Dualling of the A11 between Barton Mills and Thetford;
- The Ipswich major scheme, 'Ipswich- Transport fit for the 21st Century';
- The Beccles rail loop allowing increased frequency of trains between Ipswich and Lowestoft;
- The Beccles southern relief road;
- The Lowestoft northern spine road to help remove through traffic from the town;
- Ipswich rail chord to improve freight connections from Felixstowe; and
- Copdock A14/A12 junction improvements.

### Neighbouring authorities' local plans

**2.15** Development in the BMSDC area will not be delivered in isolation from those areas around them. The effect of new development and supporting infrastructure on neighbouring authority areas must therefore be considered as part of the SA. The BMSDC area is bordered by the following local authority areas, for which the below mentioned Local Plan documents are adopted or in preparation.

#### The North Essex Authorities

**2.16** Tendring District Council, Colchester Borough Council and Braintree District Council have been working together on the strategic cross boundary issues present in North Essex. As a result, all three Local Plans share an identical Section 1 Local Plan, which includes policies on housing numbers and infrastructure, in addition to proposals for three new Garden Communities. The North Essex Authorities' Shared Strategic Section 1 Plan was adopted by the three local councils in early 2021.

**2.17** As set out in the Section 1 Local Plan, existing settlements will be the principal focus for additional growth across North Essex within the period 2013-2033. Development will be accommodated within or adjacent to settlements according to their scale, sustainability and existing role both within each individual district and, where relevant, across the wider strategic area. The identified total minimum housing supply for each council area over the period 2013-2033 is as follows:

- **Tendring:** 11,000 (550 per annum)
- **Colchester:** 18,400 (920 per annum)
- **Braintree:** 14,320 (716 per annum)

**2.18** A proportion of this housing will be delivered through a new Garden Community:

- **Tendring/Colchester border:** a new garden community will deliver 2,500 new homes within the plan period (as part of an overall total of between 7,000 and 9,000 homes to be delivered beyond 2033).

**2.19** A strong, sustainable and diverse economy will be promoted across North Essex, with each council pursuing a flexible approach to economic sectors showing growth potential across the plan period. The Section 1 Local Plan sets out a range of employment floorspace to be met in each local authority area:

- Braintree – 20.9 to 43.4ha
- Colchester – 22.0 to 30.0ha
- Tendring – 12.0 to 20.0ha

**2.20** The Section 2 Local Plans of each local authority area will allocate employment land to ensure that provision is made within the ranges identified.

#### Tendring District Council

**2.21** As mentioned previously, Section 1 of Tendring District Council's Local Plan was adopted in January 2021.

**2.22** Section 2 of Tendring District Council's Local Plan has been prepared by Tendring District Council and contains policies and site allocations relating solely to the District. Section 2 was submitted for examination alongside Section 1 of the Publication Draft Local Plan in October 2017. Section 2 of the Tendring District Local Plan 2013-2033 and Beyond was formally adopted in January 2022.

**2.23** Section 2 of the Local Plan identifies some of the main challenges faced by the District, and sets out the vision of this Plan to be achieved by 2033. The Plan identifies strategic priorities for achieving sustainable development in the plan area. The strategic priorities also set out the approach for economic growth in Tendring, meeting the social needs of a

growing population and protecting places that make Tendring an attractive place to live, work and visit.

**2.24** Section 2 of the Plan also includes site specific policies that allocate strategic mixed-use sites, strategic housing sites for between 100 and 300 homes, medium sites to deliver between 10 and 100 homes, and strategic employment sites.

### Colchester City Council

**2.25** Section 1 of Colchester City Council's Local Plan was adopted in February 2021.

**2.26** Section 2 of Colchester City Council's Local Plan was submitted for Examination at the same time as Section 1, in October 2017. It was adopted by Colchester City Council in July 2022.

**2.27** The Section 2 Local Plan includes policies and maps for considering planning applications, and site allocations for new development for housing, employment, and infrastructure within Colchester only.

**2.28** The Section 2 Local Plan sets out that at least 14,720 new homes are to be delivered in Colchester Borough between 2017 and 2033. The focus of growth is to be Colchester Urban Area, followed by Tendring / Colchester Borders Garden Community and the higher order settlements (i.e. the Sustainable Settlements) identified through the plan. The plan also allocates 32 ha of land to plan for the delivery of employment land up to 2033. An additional 3.5 hectares of employment land is expected to come forward in Colchester within the Tendring Colchester Borders Garden Community with a further 25 hectares to be allocated in the overall Garden Community for development post-2033.

**2.29** Development within the Tendring / Colchester Garden Community, which straddles the boundary of the two Districts, is to be guided by the Tendring Colchester Borders Garden Community Development Plan Document (DPD). The DPD was submitted for examination in September 2023.

### Braintree District Council

**2.30** Section 1 of Braintree's Local Plan was adopted in February 2021.

**2.31** Section 2 of Braintree District Council's Local Plan was submitted for examination in October 2017. Section 2 of the Local Plan was adopted in July 2022.

**2.32** Section 2 of the Braintree Local Plan contains policies, maps and sites for development, housing, employment, regeneration within Braintree only.

**2.33** The Section 2 Local Plan sets out that a minimum of 14,320 new homes will be delivered in Braintree between 2013 and 2033. Homes will be located primarily in the Main

Towns and Key Service Villages. Strategic growth locations are identified at:

- East of Great Notley (in Black Notley Parish) (1,750 homes);
- Land East of Broad Road, Braintree (1,000 homes);
- Former Towerlands Park site, Braintree (575 homes);
- Land at Feering (795 homes);
- Wood End Farm, Witham (400 homes); and
- North West Braintree – Panfield Lane (825 homes).

**2.34** According to Section 1 of the Local Plan, Braintree should deliver between 20.9 and 43.3ha of new employment land. The Section 2 Local Plan identifies 42.1ha of employment land through new strategic allocations.

### West Suffolk Council

**2.35** Forest Heath District Council and St Edmundsbury Borough Council were replaced by a single district council on 1<sup>st</sup> April 2019, called West Suffolk Council. The adopted Local Plans covering the former Forest Heath and St Edmundsbury areas will continue to apply to those parts of West Suffolk Council until a new Local Plan is adopted. West Suffolk Council has commenced a review of the Local Plan which will set out the long term planning and land use policies for the area. Consultation on the Submission Draft of the new Local Plan runs until March 2024. The Submission Draft Local Plan identifies 15,486 homes (net) for delivery to meet the overall housing requirement. Development has been distributed to the more sustainable locations with much of the growth over the plan period to be provided at the towns and key service centres. Provision is also made in the plan for 86ha of employment land by 2040. This includes 79ha to be provided at strategic allocations, including 10ha at Suffolk Business Park extension.

**2.36** An existing document, the Joint Development Management Policies Document (2015), applies to both former districts and sets out the policy context for which planning decisions should be determined – replacing many of the policies contained within each former local authorities' Local Plan.

### Former Forest Heath District Council area

**2.37** The former Forest Heath District Council area's Core Strategy Development Plan Document 2001-2026 (with housing projected to 2031) was adopted in 2010. The Single Issue Review (SIR) was then published in September 2019 to replace Policy CS7 in the Core Strategy. The SIR was prompted by a High Court challenge, which resulted in the majority of Policy CS7 and elements of CS1, CS13 and paragraph 3.12.2 being revoked from the adopted Core

Strategy. A Site Allocations Local Plan (2019) also forms part of the Local Plan and sets out site allocations within the former District.

**2.38** Amended Policy CS7 makes provision for at least 6,800 new dwellings to be delivered in the period 2011-2031, as set out below:

- **Brandon:** 146 new homes;
- **Mildenhall:** 1,599 new homes;
- **Newmarket:** 1,090 new homes;
- **Lakenheath:** 768 new homes;
- **Red Lodge:** 1,786 new homes;
- **Primary Villages:** 1,486 new homes;
- **Other<sup>7</sup>:** 181 new homes; and
- **Windfall:** 225 new homes.

**2.39** With regard to employment, the Site Allocations Local Plan document designates five sites for employment use, which equates to around 23.6ha of new employment land:

- **Mildenhall Academy and Dome Leisure Centre site, Mildenhall** (4 hectares);
- **St Leger, Newmarket** (1.6 hectares);
- **Land west of Mildenhall** (5 hectares);
- **Land north of Acorn Way, Red Lodge** (8 hectares); and
- **Hatchfield Farm, Newmarket** (5 hectares).

#### Former St Edmundsbury Borough Council

**2.40** The former St Edmundsbury Borough Council area's Core Strategy was adopted in 2010 and makes provision for at least 9,000 new homes between 2008 and 2031. These homes will be provided as follows:

- **2008-2016:** 481 per annum;
- **2017-2021:** 577 per annum; and
- **2022-2031:** 583 per annum.

**2.41** With regard to employment, the Core Strategy states that provision will be made for development that will aim to deliver at least 13,000 additional jobs in the Borough by 2026. Employment land east of Suffolk Business Park, Bury St Edmunds (68.28 hectares) and Hanchett End at Haverhill (12 hectares) 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.

**2.42** Vision documents have also been adopted for the towns Bury St Edmunds and Haverhill, in addition to one for rural areas. These documents provide further detail on the policies set out in the Core Strategy, in addition to site allocations. The Vision documents for Bury St Edmunds and Haverhill guide the overall direction of future development and service provision within these towns for the next 20 years and beyond.

#### Breckland District Council

**2.43** The Breckland Local Plan was adopted in November 2019. In order to meet future housing needs, the Local Plan seeks to provide no less than 15,289 new homes between 2011 and 2036, at an average of 612 dwellings per annum. The annualised level of new housing provision will increase during the plan period, from 584 per year from 2017/18-2021/22 to 622 per year from 2021/22. Housing growth will be distributed in line with the following individual settlement targets:

- **Key Settlements:** 50% (Attleborough and Thetford).
- **Market Towns:** 28% (Dereham, Swaffham and Watton).
- **Local Service Centres:** 15% (Ashill, Banham, Bawdeswell, Garboldisham, Great Ellingham, Harling, Hockering, Kenninghall, Litcham, Mattishall, Narborough, Necton, North Elmham, Old Buckenham, Shipdham, Sporle, Swanton Morley and Weeting).
- **Villages with Boundaries:** 7% (Beeston, Beetley, Carbrooke, Caston, Gressenhall, Griston, Hockham, Lyng, Mundford, North Lopham, Rocklands, Saham Toney, Thompson, Weasenham, Shopham, Eccles Road, Clint Green and Yaxham).

**2.44** With regard to economic development, 64 hectares of employment land will be allocated for the period 2011-2036, at the following locations:

- **Attleborough:** at least 10 hectares;
- **Dereham:** at least 3 hectares;
- **Swaffham:** at least 8 hectares;
- **Thetford:** at least 22 hectares; and
- **Snetterton:** at least 20 hectares.

<sup>7</sup> Other indicates completions and commitments within rural areas, secondary villages and small settlements.

## South Norfolk Council

**2.45** South Norfolk Council worked with Broadland District Council, Norwich City Council and Norfolk County Council as part of the Greater Norwich Development Partnership to produce a Joint Core Strategy. The Joint Core Strategy was adopted in March 2011, with amendments relating to housing growth in Broadland adopted in January 2014. It sets out the overarching strategy for growth across the three districts to 2026 and identifies key locations for housing and employment growth to ensure that future development is sustainable. According to the Joint Core Strategy, at least 36,820 new homes will be built between 2008 and 2026, in addition to 27,000 new jobs created.

**2.46** A Site Specific Allocations and Policies Document (2015) and Development Management Policies Document (2015) also form part of South Norfolk's Local Plan. Guided by the Joint Core Strategy, the Site Specific Allocations and Policies Document designates areas of land to deliver housing, employment, recreation, open spaces and community uses. The Development Management Policies Document (2015) is used to assess planning applications and guide development proposals.

**2.47** South Norfolk Council is currently working with Broadland District Council, Norwich City Council and Norfolk County Council to develop the Greater Norwich Local Plan (GNLP). The GNLP will build on the joint working arrangements for Greater Norwich, which have delivered the current Joint Core Strategy. The Joint Core Strategy plans for the housing and job needs of the area to 2026 and the GNLP will ensure that these needs continue to be met to 2038. The Local Plan was submitted for Examination in summer 2021. Adoption of the GNLP is expected in spring 2024. The Pre-Submission Draft GNLP (considerate of proposed Main Modifications) provides for around 45,000 new homes and around 360 ha of employment land. The majority of this new growth is to be focused towards the Norwich urban area.

## East Suffolk Council

**2.48** Suffolk Coastal District Council and Waveney District Council were replaced by a single district council on 1<sup>st</sup> April 2019 called East Suffolk Council. There are two parts to the Local Plan in East Suffolk, the Suffolk Coastal Local Plan and the Waveney Local Plan.

**2.49** The Suffolk Coastal Local Plan covers the former Suffolk Coastal District area and was adopted in September 2020. The Plan covers the period 2018-2036. The Local Plan supports the provision of 37,328 dwellings across the wider Ipswich Housing Market Area over the period 2018-2036. Additionally, it contributes towards the creation of at least 30,320 jobs through the provision of at least 49.8ha of employment land across the Ipswich Functional Economic

Area. Within the Plan area, provision is made for at least 9,756 houses and 11.7ha of land for employment uses over the period 2018-2036. Much of the growth for the plan area is focused at the communities related to the A12 (including at Saxmundham) as well as at Felixstowe (including Trimleys). The plan includes the delivery of new Garden Neighbourhoods at North Felixstowe and South Saxmundham.

**2.50** The Waveney Local Plan was adopted in March 2019 and applies to the part of East Suffolk formerly covered by the Waveney local planning authority area. The Local Plan makes provision for the delivery of 8,223 dwellings in Waveney (374 per year) over the period 2014-2036. This new residential development will be distributed across the District as follows:

- **Lowestoft Area:** 56% of housing growth;
- **Beccles and Worlingham:** 16% of housing growth;
- **Halesworth and Holton:** 8% of housing growth;
- **Bungay:** 6% of housing growth;
- **Southwold and Reydon:** 4% of housing growth; and
- **Rural Area:** 10% of housing growth.

**2.51** The Local Plan also seeks to maximise economic growth through the creation of 5,000 additional jobs in Waveney. To deliver this, provision has been made for 43 hectares of employment land for B1, B2 and B8 uses, and 2,200m<sup>2</sup> of convenience and 11,000m<sup>2</sup> of comparison retail floorspace. Employment land development will be focused mainly in Lowestoft and Beccles and distributed approximately as follows:

- **Lowestoft Area:** 60% of employment land development;
- **Beccles:** 25% of employment land development; and
- **Other Market Towns and Rural Areas:** 15% of employment land development.

**2.52** 60-70% of retail and leisure development will be focused in Lowestoft Town Centre, with 15% in Beccles. The remaining proportion of development should come from within District Centres, Local Centres and Market Towns.

## Ipswich Borough Council

**2.53** The Ipswich Local Plan Review 2018-2036 was adopted in March 2022 and comprises the Core Strategy and Policies Development Plan Document Review, in addition to the Site Allocations and Policies Development Plan Document Review (Incorporating IP-One Area Action Plan).

**2.54** According to the 2022 Core Strategy and Policies Development Plan Document Review, the Council has a housing requirement of at least 8,280 dwellings for the period 2018-2036. The Plan commits the Council to the delivery of at



least 460 dwellings per year across the Plan period to meet need arising from Ipswich. The Council will additionally allocate land to provide for at least 4,431 dwellings in the Borough. The Ipswich Garden Suburb development will contribute significantly to meeting the housing needs of the Borough throughout the plan period.

**2.55** Sites are identified through the Site Allocations and Policies Development Plan Document in accordance with the spatial strategy in the Core Strategy, in addition to the land allocated at the Ipswich Garden Suburb and the northern end of Humber Doucy Lane. 650 dwellings are expected to be delivered on small windfall sites between 2022 and 2036. The housing land supply for the plan period (2018-2036) will consist of:

- **Ipswich Garden Suburb (3,500 minus 205 completions expected late 2036 and 1,915 granted planning permission in January 2020):** 1,380
- **Northern end of Humber Doucy Lane allocated through Policy ISPA4:** 449
- **Site Allocations through the IP-One Area Action Plan:** 2,880
- **Windfall sites (2022-2036):** 650 (50 per annum).

**2.56** With regard to employment, Ipswich Borough Council will encourage the provision of approximately 9,500 jobs in the Borough between 2018 and 2036 by allocating a range and choice of sites amounting to at least 23.2ha of land for employment development (in use classes B1, B2 and B8). The Council will also protect existing employment land for employment use.

### Nationally Significant Infrastructure Projects

**2.57** Development in BMSDC could have an effect on Nationally Significant Infrastructure Projects (NSIPs). NSIPs within and outside of BMSDC that may affect or be affected by development are set out below.

#### Bramford to Twinstead

**2.58** Bramford to Twinstead will see the construction and operation of a new double circuit electricity transmission network reinforcement of around 29km, consisting of overhead lines, underground cables, a grid supply substation and associated development. The application was submitted in 2023, with Examination beginning in September 2023.

**2.59** This project will strengthen the electricity transmission network and deliver cleaner and greener electricity, supporting the UK's move to net zero. There is potential for some adverse effects on the landscape where overhead lines are located.

#### Progress Power Station

**2.60** A rapid response gas-fired power plant referred to as Progress Power, was granted planning permission on 23<sup>rd</sup> July 2015 by the Secretary of State for Energy and Climate Change. The power station will be located in the north of BMSDC, 1km north west of the village of Eye, 4km south of the town of Diss and adjacent to the A140, which links Ipswich to Norwich.

**2.61** The power station site covers an area of approximately 10ha and is located within the Eye Airfield business and industrial estates. There will be one stack (chimney) at the power station, up to 35 metres in height. A plume consisting mainly of water vapour may be visible from the stack under certain environmental conditions but will not cause harm to people or the environment. The emissions will be strictly limited by the Environment Agency as part of an operational Environmental Permit.

**2.62** The noise produced during the power station's operation will be strictly limited by both the Development Consent Order issued by the Secretary of State and limits set by the Environment Agency as part of the operational Environmental Permit. The combustion of natural gas in a power station does not produce any noticeable odour.

**2.63** There will be HGV traffic during the construction phase, but it would be routed to minimise congestion, noise and dirt away from Eye, Mellis and Yaxley, and other places. Once operational, there will be a negligible increase in traffic movements.

#### Bury St Edmunds to Colchester Pipeline

**2.64** Anglian Water's proposals for a 69km pipeline between Bury St Edmunds and Colchester were submitted in late December 2022 and approved on 18<sup>th</sup> September. Main works on the project are expected to start in early 2024.

**2.65** The Bury St Edmunds to Colchester Pipeline will run for 68km and includes new above-ground assets in seven locations, including pumping stations. It is part of Anglian Water's Water Resources Management Plan (WRMP) which looks 25 years ahead to manage and secure the water resources by safe-guarding against the potential future impacts of water scarcity, climate change and growth, while protecting the environment. The construction of the pipeline will require road closures in some locations, however, any impacts on traffic are expected to impact and temporary. Furthermore, Anglian Water acts as the water and wastewater provider for Babergh and Mid Suffolk and the delivery of the new pipeline is likely to support a higher quality of service for new and existing residents.

## Chapter 3

# Population, health and wellbeing

### Policy context

#### National

**3.1** The new Labour Government is currently consulting on a new version of the National Planning Policy Framework. As this new version of the NPPF has not been adopted, this SA Scoping Report only refers to the existing NPPF, which was last updated in December 2023.

**3.2** The **NPPF (2023)**<sup>8</sup> includes as part of its social objective the promotion of “strong, vibrant and healthy communities” by:

*“ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and*

*by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural wellbeing.”*

**3.3** Ultimately planning policies and planning decision making should “*aim to achieve healthy, inclusive and safe places*”.

**3.4** The document states that strategic policies should set out the pattern, scale and quality of development and make sufficient provision for “*housing (including affordable housing) ... [as well as] community facilities (such as health, education and cultural infrastructure)*.” Policies should reflect “*the size, type and tenure of housing needed*”. This policy approach is to include but should not be limited to housing requirements relating to affordable homes, families with children, older people, students, people with disabilities, service families, travellers, those who rent their homes and people wishing to commission the construction of their own homes. Major developments that involve the provision of new housing planning policies and decisions should expect at least 10% of the total number of homes to be delivered for affordable home ownership subject to conditions and exemptions.

**3.5** To help to diversify opportunities for builders, promote a better mix of site sizes and increase the number of schemes that can be built-out quickly to meet housing need, the NPPF states that local authority’s should identify, through the development plan and brownfield registers, land to

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<sup>8</sup> Ministry of Housing, Communities and Local Government (2023). National Planning Policy Framework. (see

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>)

accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;

**3.6** Where there is an identified need, development of sites not already allocated for housing to provide entry-level homes suitable for first-time buyers is to be supported by local planning authorities unless such need is already to be met at other locations within the authority area. These sites should comprise of entry-level homes that offer one or more types of affordable housing.

**3.7** The document also promotes a theme of enhancing healthy and safe communities which is to be achieved by creating places which “*promote social interaction (and) enable and support healthy lifestyles.*”

**3.8** As part of this approach social, recreational and cultural facilities and services that the community needs should be provided guided by planning policies which:

- “*plan positively provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services;*
- *support the delivery of local strategies to improve health, social and cultural wellbeing for all sections of the community;*
- *help prevent unnecessary loss of valued facilities and services.*”

**3.9** Plan making through the guidance of the NPPF recognises the important role of access to open spaces and other facilities which provide opportunities for sport and physical activity has in terms of health and wellbeing of communities. The importance of delivering a sufficient choice of school places to meet the needs of existing and new communities is also recognised in the document and local planning authorities

should take a “*proactive, positive and collaborative approach to meeting this requirement*”.

**3.10** The NPPF also sets out that the standard method provided in national planning guidance should be used to undertake a local housing need assessment identifying the minimum number of homes needed. The **Housing Delivery Test Measurement Rule Book** (2018)<sup>9</sup> provides this standard method allowing for calculation of objectively assessed housing need using government household forecasts adjusted for local house prices and local earnings. Unmet need from neighbouring areas will also need to be taken into account as part of the calculation.

**3.11** The NPPF is supported by planning practice guidance relating to:

- **Housing needs of different groups** (2021)<sup>10</sup> provides advice on planning for affordable, private rented, self-build, student and rural housing needs.
- **Healthy and safe communities** (2019)<sup>11</sup> provides guidance on achieving healthy, safe and inclusive communities, estate regeneration and school place provision.
- **Housing supply and delivery** (2019, last updated 2024)<sup>12</sup> sets out guidance on five-year land supply and Housing Delivery Test.
- **Housing for older and disabled people** (2019)<sup>13</sup> provides guidance on preparing planning policies for accessible and adaptable housing and inclusive design.
- **Noise** (2019)<sup>14</sup> advises on how planning can manage potential noise impacts in new development.
- **Light pollution** (2019)<sup>15</sup> advises on how to consider artificial light within the planning system.
- **Open space, sports and recreation facilities, public rights of way and local green space** (2014)<sup>16</sup> provides key advice on open space, sports, recreation, public

<sup>9</sup> Ministry of Housing, Communities and Local Government (July 2018). Housing Delivery Test Measurement Rule Book. (see: <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>)

<sup>10</sup> Ministry of Housing, Communities and Local Government (2021). Housing needs of different groups. (see <https://www.gov.uk/guidance/housing-needs-of-different-groups#addressing-the-need-for-different-types-of-housing>)

<sup>11</sup> Ministry of Housing, Communities and Local Government (2019). Healthy and Safe communities. (see <https://www.gov.uk/guidance/health-and-wellbeing>)

<sup>12</sup> Ministry of Housing, Communities and Local Government (2019). Housing supply and delivery. (see <https://www.gov.uk/guidance/housing-supply-and-delivery>)

<sup>13</sup> Ministry of Housing, Communities and Local Government (2019). Housing for older and disabled people. (see <https://www.gov.uk/guidance/housing-for-older-and-disabled-people>)

<sup>14</sup> Ministry of Housing, Communities and Local Government (2019). Noise. (see : <https://www.gov.uk/guidance/noise--2>)

<sup>15</sup> Ministry of Housing, Communities and Local Government (2019). Light Select Committee on Public Service and Demographic Change (2013). Ready for Ageing? (see <https://publications.parliament.uk/pa/ld201213/ldselect/ldpublic/140/140.pdf>)

<sup>16</sup> Ministry of Housing, Communities and Local Government (2014). Open space, sports and recreation facilities, public rights of way and local green space. (see <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>)

rights of way, National Trails and Local Green Space designation.

**3.12 Select Committee on Public Service and Demographic Change Report: Ready for Ageing?**<sup>17</sup>: warns that society is underprepared for the ageing population. The report states that “longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises”. The report highlights the under provision of specialist housing for older people and the need to plan for the housing needs of the older population as well as younger people.

**3.13 Fair Society, Healthy Lives**<sup>18</sup>: Investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is “overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities”.

**3.14 Planning Policy for Traveller Sites**<sup>19</sup>: Sets out the Government’s planning policy for traveller sites, replacing the older version published in March 2012. The Government’s overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

**3.15 Laying the foundations: a housing strategy for England**<sup>20</sup>: Aims to provide support to deliver new homes and improve social mobility.

**3.16 Public Health England Strategy 2020-2025**<sup>21</sup>: Identifies PHE’s priorities upon which to focus over this five-year period to protect people and help people to live longer in good health.

**3.17 Environmental Improvement Plan 2023**<sup>22</sup>: The Environmental Improvement Plan 2023 for England is the first revision of the 25 Year Environment Plan. It builds on the

vision of 25 Year Environment Plan with a new plan setting out how Defra will work with landowners, communities and businesses to deliver each of its goals for improving the environment, matched with interim targets to measure progress. Under the plan the Government will protect 30% of England’s land and sea for nature. The document identifies ten goals upon which action will be focused. The goals of most relevance to the topics of population growth, health and wellbeing are:

- Goal 2: Clean air;
- Goal 3: Clean and plentiful water;
- Goal 7: Mitigating and adapting to climate change
- Goal 9: Enhancing biosecurity; and
- Goal 10: Enhanced beauty, heritage and engagement with the natural environment.

**3.18 The Levelling-up and Regeneration Act 2023**<sup>23</sup>: sets out the direction for planning, making provisions to support the levelling-up agenda. As part of this, it seeks to streamline the planning process, including through a reform of existing EU-generated systems of SA/SEA, Habitats Regulations Assessment (HRA) and Environmental Impact Assessment (EIA), which will eventually be replaced by a simpler process known as 'Environmental Outcomes Reports'. However, secondary legislation is required to introduce the new regime and at present the requirement to undertake SEA remains in force.

**3.19 National Design Guide (2021)**<sup>24</sup>: sets out the Government’s priorities for well-designed places in the form of ten characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

**3.20 Build Back Better: Our Plan for Health and Social Care (2021)**<sup>25</sup> sets out the government’s new plan for health and social care. It provides an overview of how this plan will tackle the elective backlog in the NHS and put the NHS on a

<sup>17</sup> Select Committee on Public Service and Demographic Change (2013). Ready for Ageing? (see <https://publications.parliament.uk/pa/ld201213/ldselect/ldpublic/140/140.pdf>)

<sup>18</sup> The Marmot Review (2011). Fair Society, Healthy Lives. (see <http://www.parliament.uk/documents/fair-society-healthy-lives-full-report.pdf>).

<sup>19</sup> Department for Communities and Local Government (2023). Planning policy for traveller sites. (see <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>)

<sup>20</sup> HM Government (2011). Laying the Foundations: A Housing Strategy for England. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7532/2033676.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7532/2033676.pdf))

<sup>21</sup> Public Health England (2019). Public Health England (2019). PHE Strategy 2020-25. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/831562/PHE\\_Strategy\\_2020-25.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/831562/PHE_Strategy_2020-25.pdf))

<sup>22</sup> HM Government (2023). Environmental Improvement Plan 2023. (see <https://www.gov.uk/government/publications/environmental-improvement-plan>)

<sup>23</sup> Levelling Up and Regeneration Act 2023. (see <https://www.legislation.gov.uk/ukpga/2023/55/enacted>)

<sup>24</sup> Ministry of Housing, Communities and Local Government (2021). National Design Guid. (see: <https://www.gov.uk/government/publications/national-design-guide>)

<sup>25</sup> Department of Health and Social Care (2021). Build Back Better: Our Plan for Health and Social Care. (see <https://www.gov.uk/government/publications/build-back-better-our-plan-for-health-and-social-care>)

sustainable footing. It sets out details of the plan for adult social care in England, including a cap on social care costs and how financial assistance will work for those without substantial assets. It covers wider support that the government will provide for the social care system, and how the government will improve the integration of health and social care. It explains the government's plan to introduce a new Health and Social Care Levy.

**3.21 COVID-19 Mental Health and Wellbeing Recovery Action Plan (2021)**<sup>26</sup> sets out the Government's plan to prevent, mitigate and respond to the mental health impacts of the pandemic during 2021 and 2022. Its main objectives are to support the general population to take action and look after their own mental wellbeing; to take action to address factors which play a crucial role in shaping mental health and wellbeing outcomes; and, to support services to meet the need for specialist support.

**3.22 A fairer private rented sector White Paper (2022)**<sup>27</sup> aims to build upon the vision of the Levelling Up White Paper and reform the Private Rented Sector and improve housing quality. It outlines that everyone deserves a secure and decent home and outlines measures to improve the experience of renters in the Private Rented Sector.

**3.23 The Charter for Social Housing Residents: Social Housing White Paper (2020)**<sup>28</sup> sets out the Government's actions to ensure residents in social housing are safe, listened to, live in good quality homes and have access to redress when things go wrong.

**3.24 Using the planning system to promote healthy weight environments**<sup>29</sup> (2020), **Addendum (2021)**<sup>30</sup> provides a framework and starting point for local authorities to clearly set out in local planning guidance how best to achieve healthy weight environments based on local evidence and needs, by focusing on environments that enable healthier eating and help promote more physical activity as the default. The Addendum provides updates on the implications for planning for a healthier food environment, specifically on the hot food

takeaways retail uses, and sets out recommended actions in light of changes to the Use Class Order (UCO) in England from 1 September 2020.

### Sub-national

**3.25 Babergh and Mid Suffolk Economic Land Needs Assessment (2024)**<sup>31</sup>: Provides an assessment of the districts' economy and investigates the economic potential of the districts based on economic forecasting and modelling scenarios for future growth. It determines the future employment land requirements in the districts to support the identified growth for 2023-2037 and 2043 in respect of population projections.

**3.26 Babergh and Mid Suffolk District Councils' Joint Homes and Housing Strategy (2022)**<sup>32</sup>: Babergh and Mid Suffolk District Councils have produced their joint Homes and Housing strategy to provide focus and show their ongoing commitment to meet and address the housing challenges across the districts. The Joint Homes and Housing Strategy has nine strategic aims:

- The housing market functions effectively, providing homes which are as affordable as possible; to meet the needs of residents and support the local economy.
- There is a wide and varied choice of good quality, sustainable homes of different sizes, types and tenures, to meet the needs of a wide range of different households.
- Homelessness is prevented and our services provide positive and planned interventions.
- Babergh and Mid Suffolk is an effective social landlord known for delivering quality services.
- Homes are in high quality, sustainable environments, served by jobs and community facilities, appropriate green spaces, effective transport links and other necessary infrastructure.

<sup>26</sup> Department for Health and Social Care and Cabinet Office (2021). COVID-19 mental health and wellbeing recovery action plan. (see <https://www.gov.uk/government/publications/covid-19-mental-health-and-wellbeing-recovery-action-plan>)

<sup>27</sup> Department for Levelling Up, Housing and Communities (2022). A fairer private rented sector. (see <https://www.gov.uk/government/publications/a-fairer-private-rented-sector/a-fairer-private-rented-sector#executive-summary>).

<sup>28</sup> Ministry of Housing, Community and Local Government (2020). The charter for social housing residents: social housing white paper. (see <https://www.gov.uk/government/publications/the-charter-for-social-housing-residents-social-housing-white-paper#full-publication-update-history>)

<sup>29</sup> Public Health England (2020). Guidance and supplementary planning document template for local authority public health and planning teams. (see

<https://www.gov.uk/government/publications/healthy-weight-environments-using-the-planning-system>)

<sup>30</sup> Public Health England (2021). Addendum: Hot food takeaways use in the new Use Class Order. (see <https://www.gov.uk/government/publications/healthy-weight-environments-using-the-planning-system/addendum-hot-food-takeaways-use-in-the-new-use-class-order>)

<sup>31</sup> Lambert Smith Hampton (2024). Economic Land Needs Assessment. (see <https://www.babergh.gov.uk/documents/d/asset-library-54706/babergh-and-mid-suffolk-economic-land-needs-assessment-report-june-2024>)

<sup>32</sup> BMSDC (2022). Joint homes and housing strategy. (see <https://www.babergh.gov.uk/assets/Housing-and-Homelessness/Housing-Strategy/2022-refresh/JOINT-HOMES-AND-HOUSING-STRATEGY-2022-2.pdf>)



- Best use is made of private sector land and private accommodation across the Districts.
- People live in vibrant and well-connected communities; and homes and communities continue to meet the changing needs of residents.
- Everyone has a suitable home, and residents are able to live as healthily, safely and independently as possible within sustainable communities.
- Both councils have strong relationships with residents, developers and other partners that enable them to deliver housing, infrastructure and services effectively, and to innovate where appropriate.

**3.27 Babergh and Mid Suffolk District Councils' Leisure, Sport and Physical Activity Strategy (2021)**<sup>33</sup>: The strategy establishes a robust policy position and a clear set of strategic priorities for how the Joint Councils will support the delivery of sport and physical activity services in the future. It set out what the Councils will continue to do, building on success of the past; what they will support and enable through new ways of working; and what they will no longer do, promoting self-reliance where appropriate. The strategy highlights and fully embraces a strategic shift towards supporting wider health and wellbeing outcomes across the Districts and identifies physical inactivity, particularly amongst specific groups as a key challenge for the Councils and their partners to address.

**3.28 Babergh and Mid Suffolk Infrastructure Delivery Plan (2020)**<sup>34</sup>: Aims to consider all infrastructure needs to enable sustainable development and growth supporting residents, businesses, communities, the environment and individuals. A key objective is prioritising investment into strategic services and infrastructure. The report also considers collaboration of organisations to provide funding and the phasing of infrastructure may occur depending on the degree of growth.

**3.29 Babergh and Mid Suffolk Open Space Study (2019)**: Provides an audit of the quantity and quality of existing provision in the Districts and assesses the need for future provision.

**3.30 Joint Homelessness Reduction and Rough Sleeping Strategy**<sup>35</sup>: This Strategy covers the period 2019-2024 and sets out what BMSDC will do to prevent or relieve homelessness.

**3.31 Joint Health and Wellbeing Board Strategy Refresh 2022-2027**<sup>36</sup>: The strategy sets 'a small number of key strategic priorities for action', where there is an opportunity for partners working through the Health and Wellbeing Board to 'have a real impact' through local initiatives and activities that lead to an improvement in health and wellbeing outcomes and a reduction in health inequalities.

**3.32 Transforming Suffolk, Suffolk's Community Strategy 2008 to 2028**<sup>37</sup>: Sets out ambitions for Suffolk to be recognised for its outstanding environment and quality of life for all. The strategy aims to help make Suffolk the greenest county by enhancing the natural environment while also being an exemplar when tackling climate change. The aim is also to create a prosperous and vibrant economy; learning and skills for the Future; and safe, healthy and inclusive communities.

**3.33 Suffolk's Special Educational Needs and Disability (SEND) Strategy 2021-2023**<sup>38</sup>: This Strategy outlines the priorities Suffolk CC are working towards to improve SEND Services in Suffolk, and informs the direction of all their programmes of work. It addresses the wider improvements that parents, carers and professionals have raised as being important to ensure better outcomes for children and young people. Consultation is currently being undertaken in relation to the next SEND Strategy 2024-2028.

**3.34 Suffolk Green Access Strategy, Rights of Way Improvement Plan (ROWIP) 2020-2030**<sup>39</sup>: The Countryside and Rights of Way Act 2000 requires each highway authority to produce a Rights of Way Improvement Plan (ROWIP). This Plan contains a statement of the actions proposed for the management of public rights of way and for securing an improved network of routes in Suffolk. It also addresses open access sites, informal access arrangements, and access for walking and cycling on the wider highway network.

<sup>33</sup> BMSDC (2021). Leisure, Sport and Physical Activity Strategy. (see <https://baberghmidsuffolk.moderngov.co.uk/documents/s23553/Appendic%20A%20LSPA%20Strategy%20Update%20Report%20-%20Final%20Ver%202.0.pdf>)

<sup>34</sup> BMSDC (2020). Infrastructure Delivery Plan. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Infrastructure2020/BMSDC-IDP-Sept-2020.pdf>)

<sup>35</sup> BMSDC (2019). Joint Homelessness Reduction and Rough Sleeping Strategy 2019-2024. (see <https://www.babergh.gov.uk/assets/Housing-and-Homelessness/Housing-Strategy/HRRSS-2019-2024-Final.pdf>.)

<sup>36</sup> Health and Wellbeing Suffolk (2022). Joint Local Health and Wellbeing Strategy 2022 – 2027. (see <https://www.healthysuffolk.org.uk/asset-library/Health-and-Wellbeing-Strategy-22-27.pdf>)

<sup>37</sup> Suffolk Strategic Partnership (2008). Transforming Suffolk, Suffolk's Community Strategy 2008-2028 (see [https://www.ipswich.gov.uk/sites/default/files/scd07\\_-\\_suffolk\\_community\\_strategy.pdf](https://www.ipswich.gov.uk/sites/default/files/scd07_-_suffolk_community_strategy.pdf))

<sup>38</sup> Suffolk County Council (2021). Suffolk's Special Educational Needs and Disability (SEND) Strategy 2021-2023. (see [https://search3.openobjects.com/mediamanager/suffolk/enterprise/files/2017-05-23\\_suffolk\\_send\\_strategy\\_one\\_page\\_overview.pdf](https://search3.openobjects.com/mediamanager/suffolk/enterprise/files/2017-05-23_suffolk_send_strategy_one_page_overview.pdf))

<sup>39</sup> Suffolk County Council (2020). Suffolk Green Access Strategy Rights of Way Improvement Plan (ROWIP) 2020-2030. (see [https://search3.openobjects.com/mediamanager/suffolk/enterprise/files/send\\_strategy\\_2021-2023\\_one\\_page\\_summary.pdf](https://search3.openobjects.com/mediamanager/suffolk/enterprise/files/send_strategy_2021-2023_one_page_summary.pdf) and <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/green-access-strategy/>)

### 3.35 Babergh and Mid Suffolk District Councils'

**Communities Strategy 2019-2036**<sup>40</sup>: This Strategy seeks to bring volunteers, community leaders and publicly funded services together to plan and provide the most sustainable support so that BMSDC communities are resilient and connected places for people to live and work. The Strategy sets out both the opportunities and challenges this presents as well as tactics for delivering change and improvements. The vision is for "communities to thrive" now and in the future, built on a balanced and targeted range of services and support, equally accessible to all residents and their future generations. The strategic aim is to provide guidance, support and inspiration to BMSDC communities and the objectives are for all communities to be attractive, successful and connected.

### 3.36 Ipswich Housing Market Area Strategic Housing

**Market Assessment - Partial Part 2 update**<sup>41</sup> The Ipswich and Waveney Strategic Housing Market Assessment (SHMA) was prepared in 2017 on behalf of Ipswich, Babergh, Mid Suffolk, Suffolk Coastal and Waveney councils. The SHMA identified two housing market areas (HMA): Ipswich HMA (comprising Ipswich, Babergh, Mid Suffolk and Suffolk Coastal) and Waveney HMA (comprising Waveney), and findings were reported separately for each HMA. The update of the Part 2 of the SHMA reflects changes to the NPPF and associated Planning Practice Guidance (PPG) in relation to the standard method for assessing local housing need (LHN). It sets results for the type and tenure of future housing needed for each of the local authority areas.

## Current baseline

### Population

**3.37** The latest statistics found that in 2021, Babergh District had a population of 92,338 people, with 53,900 of these

residents aged 15-64<sup>42</sup>. Mid Suffolk District had a population of 102,699 people in 2021, with 61,300 residents aged 15-64<sup>43</sup>. Babergh District's population is expected to grow to 96,400 people<sup>44</sup> and Mid Suffolk District's population is projected to reach 109,000 people by 2031<sup>45</sup>.

**3.38** Babergh has two main towns. These are the market town of Sudbury in the west and the town of Hadleigh in the centre of the District. Mid Suffolk has three market towns being Stowmarket and Needham Market in the south of the District, and Eye in the north. Both Districts have many rural villages and open countryside where in Babergh 69% and in Mid Suffolk 75% of the population live. Overall, Babergh District has around 1.59 persons per hectare while Mid Suffolk District has a slightly lower population density at around 1.21 hectares per person<sup>46</sup>. This is much lower than Suffolk as a whole, which has a population density of 2.02 persons per hectare<sup>47</sup>, and England, which has a population density of 4.38 persons per hectare<sup>48</sup>.

**3.39** According to BMSDC's Joint Annual Monitoring Report<sup>49</sup>, both Districts have similar demography with fewer younger people and an aging population.

**3.40** In Babergh District the population has remained fairly consistent, with 53,800 individuals aged 16-64 in 2008, to 53,100 in 2021<sup>50</sup>. Between January 2021 and December 2021 there were 3,600 retired residents who made up 27.1% of the District's population. Students made up 4,100 residents

<sup>40</sup> Babergh and Mid Suffolk District Councils (2019). Communities Strategy. (see <https://www.babergh.gov.uk/documents/54707/69193/Communities+Strategy+2019.pdf/29c165d9-5456-cc94-df63-2d724893faf0?t=1684939534709>)

<sup>41</sup> Prett Brett Associates (2019) Ipswich Housing Market Area Strategic Housing Market Assessment - Partial Part 2 update (see <https://www.babergh.gov.uk/documents/d/asset-library-54706/shma-part-2-update-2019>)

<sup>42</sup> Suffolk Observatory (2023). Population Report for Babergh (see: <https://www.suffolkobservatory.info/population/reports/#/view-report/9925e741b4b449c090dd87016ce0eae9/E07000200/G2>)

<sup>43</sup> Suffolk Observatory (2023). Population Report for Mid Suffolk (see <https://www.suffolkobservatory.info/population/reports/#/view-report/9925e741b4b449c090dd87016ce0eae9/E07000203/G2>)

<sup>44</sup> Population Projections Babergh. (see <https://www.suffolkobservatory.info/population/report/view/17e45add2fd547c38a1a20bc2635673b/E07000200/>)

<sup>45</sup> Population Projections Mid Suffolk. (see <https://www.suffolkobservatory.info/population/report/view/17e45add2fd547c38a1a20bc2635673b/E07000203/>)

<sup>46</sup> Local Government Association (2023). Population density, persons per hectare in England (see <https://lginform.local.gov.uk/reports/lqastandard?mod-metric=176&mod-area=E92000001&mod-group=E07000203&mod-type=area>)

<sup>47</sup> LG Inform (2022). Population density, persons per hectare in Suffolk (see: [https://lginform.local.gov.uk/reports/lqastandard?mod-area=E10000029&mod-group=AllCountiesInCountry\\_England&mod-metric=176&mod-period=3&mod-type=namedComparisonGroup](https://lginform.local.gov.uk/reports/lqastandard?mod-area=E10000029&mod-group=AllCountiesInCountry_England&mod-metric=176&mod-period=3&mod-type=namedComparisonGroup))

<sup>48</sup> LG Inform (2022). Population density, persons per hectare in England (see: [https://lginform.local.gov.uk/reports/lqastandard?mod-area=E92000001&mod-group=AllSingleTierAndCountyLalnCountry\\_England&mod-metric=176&mod-period=3&mod-type=namedComparisonGroup](https://lginform.local.gov.uk/reports/lqastandard?mod-area=E92000001&mod-group=AllSingleTierAndCountyLalnCountry_England&mod-metric=176&mod-period=3&mod-type=namedComparisonGroup))

<sup>49</sup> BMSDC (2022-23). Annual Monitoring Report. (see <https://prod-babergh.baberghmidsuffolk.dp.placecube.com/documents/d/asset-library-54706/babergh-and-mid-suffolk-2022-23-amr-1>)

<sup>50</sup> NOMIS Population Aged 16-64 – Time Series. (see [https://www.nomisweb.co.uk/reports/lmp/la/1946157239/subreports/wapop\\_time\\_series/report.aspx](https://www.nomisweb.co.uk/reports/lmp/la/1946157239/subreports/wapop_time_series/report.aspx))

between April 2019 and March 2020 which is 33.8% of the District’s population<sup>51</sup>.

**3.41** In Mid Suffolk District, many of the sample population sizes were too small for reliable estimates. Despite this, the latest data found that between April 2021 and March 2022, 4,200 residents were retired, making up 33.3% of the population. The last estimate for the number of students in the District was 3,300 people between October 2015 and September 2016 at 3,300 people, 24.9% of the population.

**3.42** The 2021 Census found that ethnic minorities constituted 3.3% of Babergh District’s population, marking a 1.1% increase from 2011. The largest ethnic minority group was the mixed/multiple ethnic groups which made up 1.5% of the population, followed by Asian/Asian British/ Asian Welsh at 0.9%.

**3.43** For Mid Suffolk District, the 2021 Census showed that ethnic minorities constituted 3.1% of the total population, indicating a 1% increase from 2011. The largest ethnic minority group was the mixed/multiple ethnic groups which made up 1.4%, followed by Asian/ Asian British / Asian Welsh at 0.8%.

## Housing

### Provision and affordability

**3.44** In the past few years local house prices in BMSDC have steadily increased, experiencing a slight decrease in 2019 which contributed to improved affordability. Subsequently, they resumed a steady upward trend<sup>52</sup>.

**3.45** The table below shows the housing affordability ratio across the Districts which is calculated by dividing average house prices by average annual earnings to create a ratio. House prices are taken from House Price Statistics for Small Areas (HPSSAs). However, the statistics are also partially based on a survey sample of earnings data. Therefore, the data should be interpreted over a longer time series<sup>53</sup>. Typically, a ratio above 4% indicates significant affordability challenges, meaning that the median house price is significantly higher than the median earnings. Babergh and Mid-Suffolk both display ratios above 10.0 (12.6 and 10.3, respectively), demonstrating the relative unaffordability of homes within the Districts. This is also reflected at a National level, with the housing affordability ratio for England in 2022 recorded as 8.3. In 1997, 89% of local authorities had an affordability ratio of less than five times workers’ earnings, whereas only 7% had this level of affordability in 2022<sup>54</sup>.

**Table 3.1 Babergh and Mid Suffolk: Ratio of workplace-based median house price to median earnings ratio**

| Area            | 2017  | 2018  | 2019  | 2020  | 2021  | 2022  |
|-----------------|-------|-------|-------|-------|-------|-------|
| Babergh         | 10.74 | 11.48 | 10.87 | 10.68 | 11.84 | 12.64 |
| Mid Suffolk     | 10.20 | 9.44* | 8.98  | 8.70  | 9.62  | 10.28 |
| Suffolk         | 8.69  | 8.85  | 8.52  | 8.48  | 9.71  | 8.91  |
| East of England | 9.66  | 9.78  | 9.47  | 9.51  | 10.53 | 10.08 |

NB ratios marked with \* have been calculated using annualised weekly earnings.

**3.46** In 2022/23, the target in the Babergh District was to build 325 new dwellings. However, this was exceeded with 624 new dwellings being built, representing 192% of the annual target set by the national standard methodology. In Mid Suffolk, the target was 513 new dwellings but 862 were built, representing 168% of the annual target. Therefore, overall, in the latest year for which data are available, both Babergh District and Mid Suffolk District exceeded their housing targets.

**3.47** The two tables below show the percentage of affordable homes built in the Districts over the last eight years. In 2022/23, 25% of homes built in Babergh were affordable, an increase from 17% in 2021/22. For Mid Suffolk in 2022/23, 24% of homes were affordable housing, compared to 23% in 2021/22. Therefore, the proportion of affordable homes built in the previous two years has increased. However, the target for affordable housing is 25% or 35% depending on whether development takes place on brownfield or greenfield land and

<sup>51</sup> NOMIS Economically Inactive – Time Series. (see [https://www.nomisweb.co.uk/reports/lmp/la/1946157239/subreports/ei\\_nact\\_time\\_series/report.aspx?](https://www.nomisweb.co.uk/reports/lmp/la/1946157239/subreports/ei_nact_time_series/report.aspx?))

<sup>52</sup> BMSDC (2022-23). Annual Monitoring Report (see <https://prod-babergh.baberghmidsuffolk.dp.placecube.com/documents/d/asset-library-54706/babergh-and-mid-suffolk-2022-23-amr-1f>)

<sup>53</sup> Ibid.

<sup>54</sup> Office for National Statistics (2023). Housing affordability in England and Wales: 2022 (see <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2022>)

so both Districts could go further in their delivery of affordable housing.

**Table 3.2 Babergh net residential completions by annual monitoring report year**

| Babergh       |                     |                         |                            |                     |                          |
|---------------|---------------------|-------------------------|----------------------------|---------------------|--------------------------|
| AMR Year      | Net Completions (A) | Of which Affordable (B) | % Affordable (B as % of A) | No. of Windfall (C) | % Windfall (C as % of A) |
| 2022/23       | 624                 | 156                     | 25%                        | 568                 | 83%                      |
| 2021/22       | 758                 | 130                     | 17%                        | 736                 | 97%                      |
| 2020/21       | 402                 | 89                      | 22%                        | 346                 | 86%                      |
| 2019/20       | 293                 | 114                     | 39%                        | 218                 | 74%                      |
| 2018/19       | 579                 | 52                      | 9%                         | 456                 | 79%                      |
| 2017/18       | 331                 | 71                      | 21%                        | 221                 | 67%                      |
| 2016/17       | 226                 | 83                      | 37%                        | 168                 | 74%                      |
| 2015/16       | 157                 | 27                      | 18%                        | 124                 | 79%                      |
| <b>Totals</b> | <b>2746</b>         | <b>564</b>              | -                          | <b>2269</b>         | -                        |

**Table 3.3 Mid Suffolk net residential completions by annual monitoring report year**

| Mid Suffolk   |                     |                         |                            |                     |                          |
|---------------|---------------------|-------------------------|----------------------------|---------------------|--------------------------|
| AMR Year      | Net Completions (A) | Of which Affordable (B) | % Affordable (B as % of A) | No. of Windfall (C) | % Windfall (C as % of A) |
| 2022/23       | 1234                | 299                     | 24%                        | 1143                | 92%                      |
| 2021/22       | 862                 | 196                     | 23%                        | 710                 | 82%                      |
| 2020/21       | 672                 | 193                     | 29%                        | 585                 | 87%                      |
| 2019/20       | 451                 | 128                     | 28%                        | 442                 | 98%                      |
| 2018/19       | 690                 | 70                      | 10%                        | 583                 | 84%                      |
| 2017/18       | 426                 | 114                     | 27%                        | 292                 | 69%                      |
| 2016/17       | 305                 | 53                      | 17%                        | 230                 | 75%                      |
| 2015/16       | 304                 | 78                      | 26%                        | 240                 | 79%                      |
| <b>Totals</b> | <b>3710</b>         | <b>926</b>              | -                          | <b>3082</b>         | -                        |

**3.48** In November 2023, the mean price of dwellings in Babergh District and Mid Suffolk District was £334,432 and

£311,509, respectively. This is above the national average of £284,950 but below the regional average of £346.659<sup>55</sup>.

**3.49** A suitable mix of housing is important to ensure all housing needs are met within the Districts. The 2021 Census

**Table 3.4 Type of dwellings and number of households in Babergh and Mid Suffolk (excluding caravans and other mobile and temporary structures)**

| Type of Dwelling     | Number of Households (2021) |           |             |           |
|----------------------|-----------------------------|-----------|-------------|-----------|
|                      | Babergh                     | %         | Mid Suffolk | %         |
| Detached Houses      | 16,778                      | 42%       | 20,822      | 47%       |
| Semi-Detached Houses | 12,119                      | 31%       | 14,437      | 33%       |
| Terraced Houses      | 8,293                       | 21%       | 6,041       | 14%       |
| Flats                | 2,184                       | 5%        | 2,099       | 5%        |
| <b>Other Types</b>   | <b>826</b>                  | <b>2%</b> | <b>944</b>  | <b>2%</b> |

identified the housing stock within the Districts as shown in the table below. The majority of the housing stock in both Districts is detached houses, followed by semi-detached, then terraced houses and finally flats.

**3.50** As set out in the Babergh and Mid Suffolk Joint Local Plan Part 1<sup>56</sup>, there is a total local housing need requirement of 7,904 dwellings for Babergh and 10,165 dwellings for Mid Suffolk between 2018 and 2037. For Babergh, the committed supply is 4,939 dwellings, whilst in Mid Suffolk the committed supply is 7,882 dwellings. In 2021, 85% of the local demand for housing in Babergh was met by the available housing supply, whilst in Mid-Suffolk, 100% of the local housing need was met by the available housing supply. There is an identified shortfall of 1,191 dwellings in Babergh between 2018 and 2037, which highlights a gap between projected housing need and current supply.

**3.51** As mentioned previously, both Districts have an ageing population. According to the Joint Strategic Needs Assessment (JSNA)<sup>57</sup>, the average house price has increased by 27% over the last five years. With rising average house prices, elderly residents may find it increasingly difficult to afford suitable housing or home improvements to accommodate their changing needs. Furthermore, 14.5% of homes are in fuel poverty, which has potential to burden elderly individuals who may already be on fixed incomes.

**3.52** In addition to older people, other vulnerable people may also have specialist housing needs. Suffolk is currently significantly worse than the England average at meeting the

need of residents with learning difficulties for secure and appropriate accommodation. According to the Suffolk Housing and Health Needs Assessment<sup>58</sup>, the number of people with a learning difficulty is forecast to increase. As such, there will be an increased demand for housing that meets specialist needs.

<sup>55</sup> UK House Price Index (2023). House Price Statistics. (see <https://landregistry.data.gov.uk/app/ukhpi>).

<sup>56</sup> BMSDC (2023). Babergh and Mid Suffolk Joint Local Plan – Part 1 (see <https://www.midsuffolk.gov.uk/documents/d/asset-library-54706/babergh-and-mid-suffolk-joint-local-plan-part-1-nov-2023>)

<sup>57</sup> Healthy Suffolk (2022). The State of Suffolk August 2022 (see <https://www.healthysuffolk.org.uk/asset-library/SoS/state-of-suffolk-tiles-2022.pdf>)

<sup>58</sup> Suffolk County Council (2018). Suffolk Housing and Health Needs Assessment. (see [https://www.healthysuffolk.org.uk/uploads/Suffolk\\_Housing\\_and\\_Health\\_Final\\_Mar18HWPB.pdf](https://www.healthysuffolk.org.uk/uploads/Suffolk_Housing_and_Health_Final_Mar18HWPB.pdf))



## Homelessness

**3.53 Table 3.5** shows an estimation of the number of rough sleepers recorded over the past five years in BMSDC<sup>59</sup>. The number of people sleeping rough within the Districts has

**Table 3.5 Estimated rough sleeper count in BMSDC (Autumn)**

|             | 2018 | 2019 | 2020 | 2021 | 2022 |
|-------------|------|------|------|------|------|
| Babergh     | 0    | 2    | 6    | 4    | 5    |
| Mid Suffolk | 0    | 2    | 1    | 1    | 2    |

## Gypsy, Traveller and Travelling Showpeople

**3.54** A report commissioned in part by BMSDC featured 100 surveys being completed over the whole study area by Gypsy and Traveller families between November 2016 and January 2017<sup>60</sup>. There were 87 surveys completed by those on authorised sites, eight on unauthorised developments, three on unauthorised encampments and two families residing on sites with temporary planning permission. The majority of families had lived on site for more than five years and most were not intending to move in the future.

**3.55** Those residing on local authority sites were concerned about the quality and provision of sites, such as children only being able to safely play on pitches rather than freely on the site, sites being too small to accommodate everyone, but some that were too big leading to a mixture of occupants who do not get on and so do not feel safe. Families also stated that obtaining planning permission was an issue, as it was felt that there were preconceptions by the wider community.

**3.56** There are seven permanent Travelling Showpeople plots in Mid Suffolk and there is a long history of Travelling Showpeople both living and working in the study area. Travelling Showpeople recorded fewer health issues, compared to Gypsies and Travellers. In 2016 all families had travelled, mainly for work, and no families stated that they intended to stop travelling. All of the families own their plots and around a third of families stated they had young members who will require separate accommodation within the next five years, but all would prefer to stay within the local area.

**3.57** To establish the number of households residing in boats, postal surveys were completed, and Council Tax records were

decreased, which may be related to the fact BMSDC were successful in jointly bidding with West Suffolk Councils through the 'Trailblazer' programme in 2016 for a Rough Sleeper Prevention and Support Worker.

established. There were 21 permanent boat moorings in Babergh however, this could be an underestimate due to the difficulties in identifying the status and locations of houseboats.

**3.58** Only one caravan was recorded in Babergh and 108 caravans in Mid Suffolk. Therefore, when population is taken into account, the density of caravans varies with Babergh having 1 caravan per 100,000 of the population and Mid Suffolk having 109 per 100,000 of the population. The average in England is around 39 caravans per 100,000 of the population and the regional average is 81<sup>61</sup>.

**3.59** An updated assessment of need will be undertaken alongside development of the Part 2 JLP. The work will supersede the Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment and will identify whether sites need to be allocated.

## Education

**3.60** Around 20.0% of the population across Babergh and Mid Suffolk are aged 0-19 years old. Around 16.4% of the population of Babergh are school children and full-time students (14,487), whilst in Mid Suffolk 15.8% of the population are school children and full-time students (15,546). These figures are significantly lower than the national average of 20.4%<sup>62</sup>.

**3.61** The 2021 Census displayed a decrease in the percentage of residents without qualifications, to 19.0%. Those completing apprenticeships rose to 13.7%, individuals with Level 1 qualifications increased to 23.4%, and those with Level 4 and above qualifications significantly rose to 66.6%<sup>63</sup>.

<sup>59</sup> Department for Levelling Up, Housing & Communities (2023). Annual Rough Sleeping Snapshot in England: Autumn 2022 – tables (see <https://www.gov.uk/government/statistics/rough-sleeping-snapshot-in-england-autumn-2022>)

<sup>60</sup> BMSDC in part (2017). Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Final-ANA-Report-May-2017.pdf>)

<sup>61</sup> BMSDC (2017). Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment. (see

<https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Final-ANA-Report-May-2017.pdf>)

<sup>62</sup> Suffolk Observatory (2023). Children and Young People Report (see: <https://www.suffolkobservatory.info/children-and-young-people/reports/#/view-report/d925042f961344548f01582a1f85574a/E07000203/G2>)

<sup>63</sup> Babergh District Council South Suffolk (2023). Babergh State of the District Report 2023 (see <https://www.babergh.gov.uk/documents/d/babergh/babergh-state-of-the-district-2023-1>)

<sup>64</sup>. These findings suggest an overall positive trend in educational attainment within Babergh and Mid Suffolk over the decade.

**3.62** The percentage of people in Babergh and Mid Suffolk (17.4% and 17.6%, respectively) with no qualifications is lower than the national average (18.1%). The percentage of people with Level 4 qualifications and above is lower than the national average (33.9%) in both Districts (29.5% for Babergh and 30.0% for Mid Suffolk)<sup>65</sup>.

**3.63** The location of education facilities in the Districts is shown in **Figure 3.1**.

### Deprivation

**3.64** In 2019 Babergh ranked 212 out of 317 local authorities in England (1 being the most deprived), compared with a ranking of 197 in 2015. The Index of Multiple Deprivation (IMD) uses Lower Layer Super Output Areas (LSOA) to measure deprivation at local authority and county level. There are 54 LSOAs in Babergh. Around Sudbury and Great Cornard there are pockets of deprivation and some rural areas are particularly deprived in terms of access to housing and other services. Babergh 008A is located on the edge of Sudbury and is the most deprived area within the District and ranked 7,697 out of 32,844 LSOAs in England. This area is amongst the top 30% most deprived neighbourhoods in England<sup>66</sup>.

**3.65** In 2019 Mid Suffolk ranked 229 out of 317 local authorities in England, where 1 is the most deprived, compared with a ranking of 233 in 2015. There are 56 LSOAs in Mid Suffolk. The District's most deprived areas are around Stowmarket, with Mid Suffolk 008C being ranked 3,344 out of 32,844 LSOAs in England. In 2015, this area was ranked 5,405. Therefore, compared to 2015, this area was reported to be more deprived in 2019 relative to other LSOA areas in England. This area is amongst the top 20% most deprived neighbourhoods in England<sup>67</sup>.

**3.66** Based on the latest available data in 2021, it was estimated that 5,831 out of 40,200 households in Babergh were fuel poor. This equates to 14.3% of all households in the District. In Mid Suffolk 5,876 out of 44,300 households were

fuel poor in 2021, which equates to 13.1% of total households in the District. Both Districts have a higher percentage of population that is affected by fuel poverty than what is reported for the East of England (12.3%)<sup>68</sup>.

**3.67** According to the Centre for Research in Social Policy at Loughborough University, it was estimated that in 2021/22, 22.9% (4,027) of children in Babergh aged 0-15 were living in poverty, after housing costs, whilst in Mid Suffolk this figure was 20.1% (3,972)<sup>69</sup>.

**3.68** The distribution of deprivation across the Districts is shown in **Figure 3.2**.

### Health

**3.69** Health is a cross-cutting topic and as such many topic areas explored in this Scoping Report influence health either directly or indirectly. The 2021 Census statistics suggest that health in Babergh is generally good with 84.5% of the population reporting themselves to be in very good or good health, a 2.1% increase from 2011. Some 11.7% state that they are in fair health, with only 3% and 0.8% in bad or very bad health, respectively. Similarly, the 2021 Census statistics displayed that health in Mid Suffolk is generally good with 84.8% reporting themselves as in very good or good health. Some 13.1% state that they are in fair health, and 4% and 0.7% in bad or very bad health, respectively<sup>70</sup>. However, it should be noted that the 2021 Census was undertaken during the COVID-19 pandemic, and this may have influenced how people perceived their health status and activity limitations, and therefore may have affected how people chose to respond.

**3.70** The 2021 Census found that 84.1% of the population in Babergh and 84.2% in Mid Suffolk state that their day-to-day activities are not limited by their health. In Babergh, 10.1% stated they are limited a little, whilst 5.9% said that they are limited a lot. For Mid-Suffolk, 10% stay they are limited a little whilst 5.8% said they are limited a lot.

**3.71** The 2021 Census data found that 4.7% of the population (3,268) of Babergh, and 4.9% of the population (3,838) of Mid Suffolk, provide 1 to 19 hours of unpaid care a week. The number of individuals providing 50 hours or more of unpaid

<sup>64</sup> Mid Suffolk District (2023). Mid Suffolk State of the District Report 2023 (see <https://www.babergh.gov.uk/documents/d/mid-suffolk/mid-suffolk-state-of-the-district-2023-1>)

<sup>65</sup> ONS (2021) Census 2021 Custom Area Profiles: Babergh and Mid Suffolk (see <https://www.ons.gov.uk/visualisations/customprofiles/build/>)

<sup>66</sup> Indices of Deprivation. (see [http://dclgapps.communities.gov.uk/imd/ioid\\_index.html#](http://dclgapps.communities.gov.uk/imd/ioid_index.html#))

<sup>67</sup> Ibid.

<sup>68</sup> Gov.uk (2023). Sub-regional fuel poverty.(see <https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-2023-2021-data/sub-regional-fuel-poverty-in-england-2023-2021->

[data#:~:text=2023%2D2021%2Ddata-.Summary%20findings.%25%20and%20London%20\(11.9%25\)](#)

<sup>69</sup> Centre for Research in Social Policy at Loughborough University (produced for the End Child Poverty Coalition) (2023). Local child poverty indicators – estimates of rates, after housing costs (see [https://repository.lboro.ac.uk/articles/report/Local\\_indicators\\_of\\_child\\_poverty\\_after\\_housing\\_costs\\_2021\\_22/23523453](https://repository.lboro.ac.uk/articles/report/Local_indicators_of_child_poverty_after_housing_costs_2021_22/23523453))

<sup>70</sup> Public Health and Communities (2023). 2021 Census Topic Summary: Health, disability, and unpaid care (see <https://www.healthysuffolk.org.uk/asset-library/Census-2021/health-disability-and-unpaid-care-2021-census-topic-summary-final.pdf>)

care per week has notably declined between 2011 and 2021. In Babergh, 639 people, and in Mid Suffolk, 692 people, are now providing such extended periods of unpaid care<sup>71</sup>.

**3.72** Life expectancy in Babergh is 85.2 for males and 81.6 for females<sup>72</sup>, while in Mid Suffolk life expectancy is 84.8 for males and 81.4 for females<sup>73</sup>. Life expectancy in Babergh is 5.5 years lower for men and 3.1 years lower for women in the most deprived areas, while in Mid Suffolk it is 5.7 years lower for men and 4.9 years for women. The Health Deprivation and Disability Domain of the IMD measures the risk of premature death and the impairment of quality of life through poor physical or mental health. Babergh is ranked 257 on the health and disability rank, whilst Mid Suffolk is ranked 285 out of 317 local authorities in this regard<sup>74</sup>.

**3.73** The Health Index for England is a measure of the health of the nation, employing a broad definition to yield a single value indicating health trends over time. This index comprises three distinct health domains:

- Healthy People;
- Healthy Lives; and

■ Healthy Places.

**3.74** The Health Index is comprised of 56 indicators, summarised into 14 subdomains, 3 domains, and subsequently an overall score for each geographical area. Overall, health in Babergh has improved from a score of 107.4 in 2015 to 114.1 in 2021. Similarly, health as based on the index has improved in Mid Suffolk, from a score of 112.9 in 2015 to 119.8 in 2021. This is better than the nationwide 2021 score of 100.8<sup>75</sup>.

**3.75** The distribution of health facilities in the Districts is shown in **Figure 3.1**.

**Open spaces, sports and recreation**

**3.76** The Babergh and Mid Suffolk Open Spaces Assessment<sup>76</sup> assessed the quality of 519 open spaces in the Districts using criteria set out in the Green Flag Award. The study was a technical assessment that calculated the amount of existing open space for a range of different use. A review of this assessment is currently ongoing.

**Table 3.6 Summary of open spaces in Babergh and Mid Suffolk**

| Typology   | Existing (ha) | Per 1,000 people (ha) | Quantity Standards per 1,000 people (ha) |
|--|---------------|-----------------------|--|
| Accessible Natural Greenspace                        | 900.6         | 4.88                  | ANGSI*                                   |
| Amenity Greenspace                                   | 233.62        | 1.27                  | 1.0                                      |
| Parks and Recreation Grounds                         | 163.16        | 0.93                  | 1.0                                      |
| Parks and Recreation Grounds including Outdoor Sport | 170.68        | 0.88                  | 1.0                                      |
| Open Space for Children                              | 11.35         | 0.06                  | 0.06                                     |
| Open Space for Youth                                 | 2.48          | 0.01                  | 0.04                                     |

<sup>71</sup> ONS (2023). Unpaid care, England and Wales: Census 2021. (see <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandwellbeing/bulletins/unpaidcareenglandandwales/census2021>)

<sup>72</sup> Babergh District Council South Suffolk (2023). Babergh State of the District Report 2023 (see <https://www.babergh.gov.uk/documents/d/babergh/babergh-state-of-the-district-2023-1>)

<sup>73</sup> Mid Suffolk District (2023) State of the District Report 2023 (see <https://www.babergh.gov.uk/documents/d/mid-suffolk/mid-suffolk-state-of-the-district-2023-1>)

<sup>74</sup> Ministry of Housing, Communities and Local Government (2019). IoD2019 Interactive Dashboard – Local Authority Focus (see <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsoci>

[alcare/healthandwellbeing/bulletins/unpaidcareenglandandwales/census2021](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandwellbeing/bulletins/unpaidcareenglandandwales/census2021)) <https://app.powerbi.com/view?r=eyJrjoiOTdjYzlyNTMtMTcxNi00YmQ2LWI1YzqtMTUyYzZmOWQ3NzQ2liwidCI6ImJmMzQ2ODEwLTIjN2QtNDNkZS1hODcyLTl0YTJiZjM5OTVhOCJ9>.

<sup>75</sup> Office for National Statistics (2023). All data related to Health in England: 2015 to 2021 (see <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandwellbeing/bulletins/healthinengland/latest/relateddata>)

<sup>76</sup> BMSDC (2019). Open Space Assessment. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Babergh-and-Mid-Suffolk-Open-Space-Study-May-2019.pdf>)

| Typology          | Existing (ha) | Per 1,000 people (ha) | Quantity Standards per 1,000 people (ha) |
|-------------------|---------------|-----------------------|--|
| Sports Club Space | 68.39         | 0.37                  | N/A                                      |

\*Natural England Accessible Natural Green Space Standards

**3.77** Natural England Accessible Natural Green Space Standards (ANGSI) are:

- at least one accessible 20-hectare site within two kilometres of home;
- one accessible 100-hectare site within five kilometres of home; and
- one accessible 500-hectare site within ten kilometres of home; plus
- a minimum of 1 hectare of statutory Local Nature Reserves per thousand population at least 2 hectares in size, no more than 300 metres (5 minutes' walk) from home.

**3.78** The table shows that there is more than the set quantity standard of amenity greenspace<sup>77</sup> per 1,000 of the population. However, parks and recreation grounds are under the set quantity standard even when outdoor sport is included.

**3.79** As part of the assessment, a survey with BMSDC parishes was undertaken, which saw 75 responses from 199 parishes. Results found that 68% of Town/Parish Councils were directly responsible for the management of various local spaces and outdoor recreational facilities and 64% of local councils noted a need for additional or improved open space, play and outdoor recreation facilities. Other results found there is not enough space for teenagers (e.g. skateparks and shelters) and there is a need for additional multi-use games areas (MUGAs).

**3.80** The distribution of open space in the Districts is shown in **Figure 3.3**.

**Crime**

**3.81** Babergh and Mid Suffolk Districts have lower overall crime rates compared to the regional and national averages, as of November 2023. In Babergh, the overall crime count between December 2022 and November 2023 was 4,135. The

highest recorded crime count for this period was for violence and sexual offences, totalling 2,016 incidents. All other crime categories had significantly lower counts, with criminal damage and arson ranking second highest at 424 incidents. Overall, Babergh exhibits a lower crime rate than both Suffolk and England as a whole, with a rate of 3.4 per 1,000. In comparison, Suffolk's rate stands at 4.9, while England's rate was 6.7 as of November 2023. In Mid Suffolk, the overall crime rate between December 2022 and November 2023 was 3,800. Much like Babergh, the highest recorded crime count in Mid Suffolk for this period was for violence and sexual offences, totalling 1,822. All other crime categories had significantly lower counts, with criminal damage and arson ranking second highest at 386 incidents. Overall, Babergh's crime rate is lower compared to both Suffolk and England as a whole, with a rate of 2.5 per 1,000 as of November 2023<sup>78</sup>.

**Future baseline and likely evolution without the Part 2 Joint Local Plan**

**3.82** Babergh District's population is expected to grow to 96,400 people<sup>79</sup> and Mid Suffolk District's population is projected to reach 109,000 people by 2031<sup>80</sup>. This is an increase of 4.38% and 6.13%, respectively, from 2021 Census levels. Both Districts display a similar demographic trend, characterised by a decline in younger people and a rise in the ageing population. By 2043, the 65-plus population is forecasted to constitute a third (33.8% for Babergh<sup>81</sup> and 32.4% for Mid Suffolk<sup>82</sup>) of all residents, significantly surpassing the projected percentage for England at 22.2%. This growth in older population is likely to place additional pressure on housing and on the capacity of local services and facilities, such as GP surgeries and hospitals.

**3.83** Both Districts face challenges due to an ageing population, with a 27% increase in average house prices over the last five years. This rise in prices makes it harder for elderly residents to afford suitable housing or home improvements. Additionally, 14.5% of homes are in fuel

<sup>77</sup> Amenity greenspace includes open to free land that is not laid out in a certain way or does not have a specific function, such as a park or public playing field

<sup>78</sup> Suffolk Observatory (2023). Crime Report (see: <https://www.suffolkobservatory.info/crime-and-community-safety/#/view-report/48facb1714aa4261a67cbe7d59bfec28/iaFirstFeature/G3>)

<sup>79</sup> Population Projections Babergh. (see <https://www.suffolkobservatory.info/population/report/view/17e45add2fd547c38a1a20bc2635673b/E07000200/>)

<sup>80</sup> Population Projections Mid Suffolk. (see <https://www.suffolkobservatory.info/population/report/view/17e45add2fd547c38a1a20bc2635673b/E07000203/>)

<sup>81</sup> Babergh District Council South Suffolk (2023). Babergh State of the District Report 2023 (see <https://www.babergh.gov.uk/documents/d/babergh/babergh-state-of-the-district-2023-1>)

<sup>82</sup> Mid Suffolk District (2023). Mid Suffolk State of the District Report 2023 (see <https://www.babergh.gov.uk/documents/d/mid-suffolk/mid-suffolk-state-of-the-district-2023-1>)

poverty, adding to the burdens of elderly individuals on fixed incomes. Suffolk falls short of meeting the housing needs of residents with learning difficulties compared to the national average, with an increasing demand for specialised housing forecasted. Local house prices in BMSDC are likely to continue to increase, exacerbating the affordability crisis for residents, especially older people. While there has been an increase in the percentage of affordable homes built in the Districts over the last two years, they may not be sufficient to meet the growing demand for affordable housing.

**3.84** Babergh and Mid Suffolk districts in Suffolk maintain lower overall crime rates compared to the regional and national averages as of November 2023. Without the Part 2 JLP in place, the trend of lower overall crime rates is at risk of changing, particularly due to challenges in addressing underlying socio-economic factors that contribute to crime.

**3.85** Babergh has improved from being the 197<sup>th</sup> most deprived local authority in England in 2015, to 212<sup>th</sup> in 2019 (1

being most deprived) has per the overall deprivation measure presented in the Indices of Multiple Deprivation. Mid Suffolk ranked 229 out of 317 local authorities in England in 2019, compared with a ranking of 233 in 2015<sup>83</sup>. Whether these trends will continue is uncertain. Based on the Babergh and Mid Suffolk Open Spaces Assessment<sup>84</sup>, there is more than the set quantity standard of amenity greenspace<sup>85</sup> per 1,000 of the population. However, parks and recreation grounds are under the set quantity standard even when outdoor sport is included. Without the Local Plan, there is potential for the quality of open spaces to deteriorate, whilst access to open space will remain limited.

### Key sustainability issues

**3.86** The key sustainability issues for population, health and well-being, and the opportunities for the Joint Local Plan Part 2 to address them are shown in **Table 3.7**.

**Table 3.7: Key sustainability issues and opportunities for the Joint Local Plan Part 2 to address them**

| Key sustainability issues for Babergh and Mid Suffolk  | Opportunities for the Joint Local Plan Part 2 to address the key sustainability issues  | Relevant SA objectives |
|--|---|------------------------|
| BMSDC has an ageing population, which has the potential to result in pressure on the capacity of local services and facilities, such as GP surgeries and hospitals. An ageing population also requires a mixture of housing that will meet the needs of older people, whilst also freeing up houses for younger residents. Current housing stock is predominantly old and inefficient to heat, and therefore unsuitable. | The JLP Part 2 will set out the spatial distribution of development and so has the opportunity to locate residential development within close proximity of local services and facilities and in more rural areas, which may stimulate the development of new services and facilities. The Plan will include housing requirement figures for Neighbourhood Plan areas, which will provide a clear understanding of the demand for housing within specific communities. The JLP Part 2 will also identify suitable land for development through site allocations, which can help to encourage building new housing tailored to the needs of older residents and prioritise the redevelopment of inefficient and outdated housing stock. | SA objectives 1, 3, 4. |
| There is a need for affordable housing in BMSDC because at present, the mean price of dwellings is higher than the national average and for Babergh and Mid Suffolk is also higher than the regional average.  | The JLP Part 2 provides an opportunity to facilitate and expedite the delivery of affordable housing through the spatial distribution of housing allocations, whilst also supporting the provision of a more appropriate mix of new homes to meet the needs of a growing population.  | SA objective 4.        |
| There are a number of vulnerable people, including people with learning difficulties, who  | The JLP Part 2 provides an opportunity to specify how much specialist housing is needed through   | SA objective 4.        |

<sup>83</sup> Indices of Deprivation. (see [http://dclgapps.communities.gov.uk/imd/iod\\_index.html#](http://dclgapps.communities.gov.uk/imd/iod_index.html#))

<sup>84</sup> BMSDC (2019). Open Space Assessment. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/Current->

[Evidence-Base/Babergh-and-Mid-Suffolk-Open-Space-Study-May-2019.pdf](#))

<sup>85</sup> Amenity greenspace includes open to free land that is not laid out a certain way or does not have a specific function, such as a park or public playing field

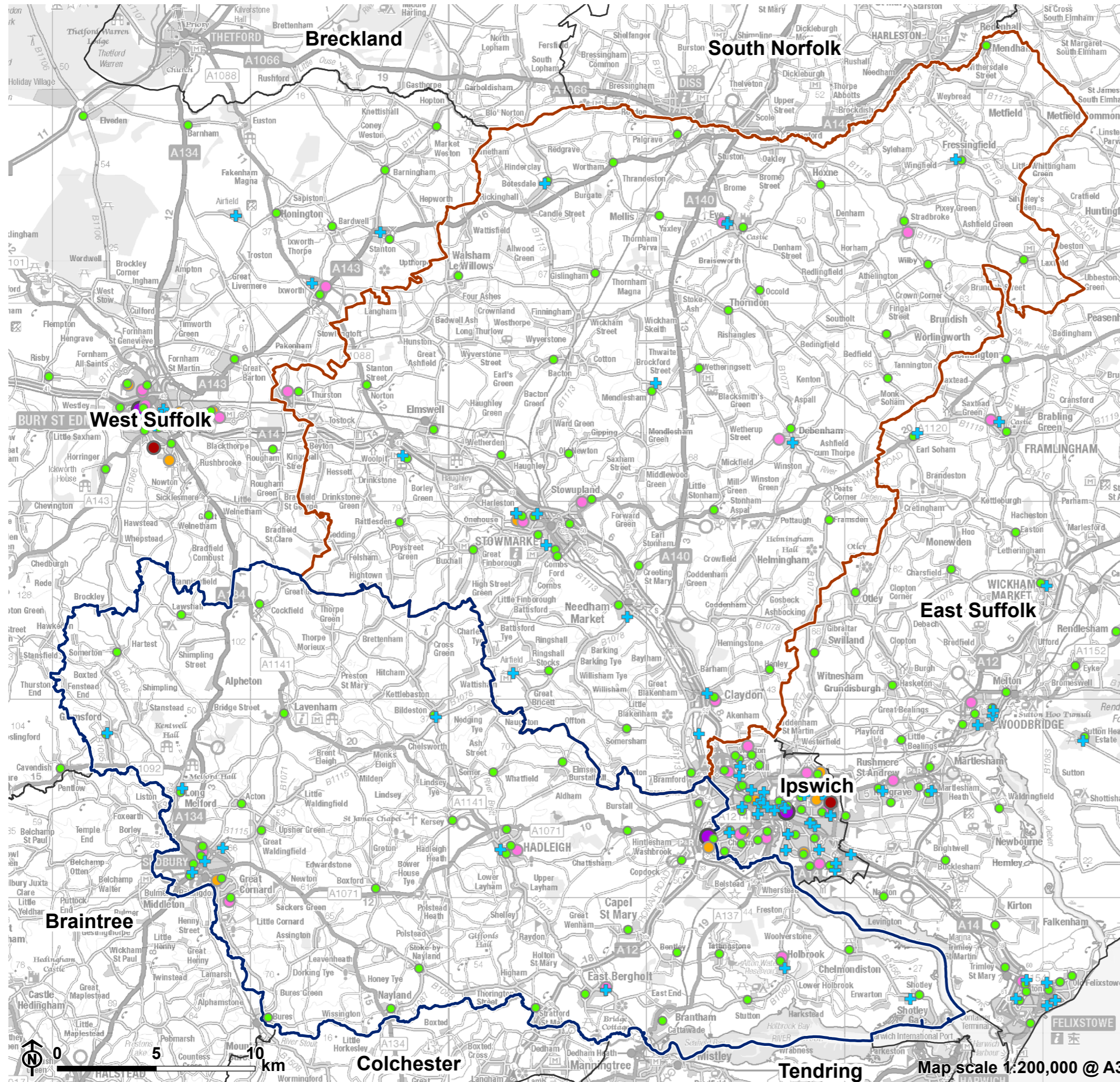


| Key sustainability issues for Babergh and Mid Suffolk   | Opportunities for the Joint Local Plan Part 2 to address the key sustainability issues  | Relevant SA objectives        |
|---|---|-------------------------------|
| have specialist housing needs (defined as sheltered, extra care, residential care or nursing care).   | the spatial distribution of housing allocations. An up-to-date settlement hierarchy will help to identify suitable locations for specialist housing facilities based on factors such as access to amenities, services, and transport links.   |                               |
| There are high percentages of residents within Babergh District and Mid Suffolk District who live in rural areas, comprising 69% of Babergh's population and 75% of Mid Suffolk's population. Villages and rural areas tend to have less in the way of jobs, services and facilities than the market towns, and continue to lose services and facilities (e.g. shops and pubs). | The JLP Part 2 provides an opportunity to ensure that those living within rural areas are supported by infrastructure, services and facilities through site allocations, although it will continue to be a challenge to do so compared with more urban locations, due to viability.                                       | SA objectives 1, 3 and 14.    |
| The number of people who have a Level 4 qualification (Degree, Higher Degree, NWQ Level 4-5, Higher National Certificate and Higher National Diploma) and above is lower than the national average.   | The JLP Part 2 presents the opportunity to improve the accessibility and provision of high-quality education and training facilities in the Districts. The JLP Part 2 offers an opportunity to require large development sites to allocate space and resources for new educational facilities.                            | SA objective 2.               |
| Although BMSDC is not generally deprived, pockets of deprivation exist across the area, with some rural areas being particularly deprived in terms of access to services and facilities.  | The JLP Part 2 presents an opportunity address deprivation by ensuring equitable access to essential services, amenities, and opportunities for all residents, particularly through strategic site allocations. The JLP Part 2 will thereby allow for changing circumstances in BMSDC to be more appropriately addressed. | SA objectives 1, 2, 3 and 14. |
| The provision of green space varies across BMSDC, with a deficiency in parks and recreation grounds identified and an identified need for improved open space, play and outdoor recreational facilities.  | The JLP Part 2 offers the opportunity to better address the changing circumstances in the Plan area by designating specific areas as open spaces, with relevant development management policies, which will ensure the protection and enhancement of access to and quality of open space.                                 | SA objective 1.               |





Figure 3.1: Education and health facilities

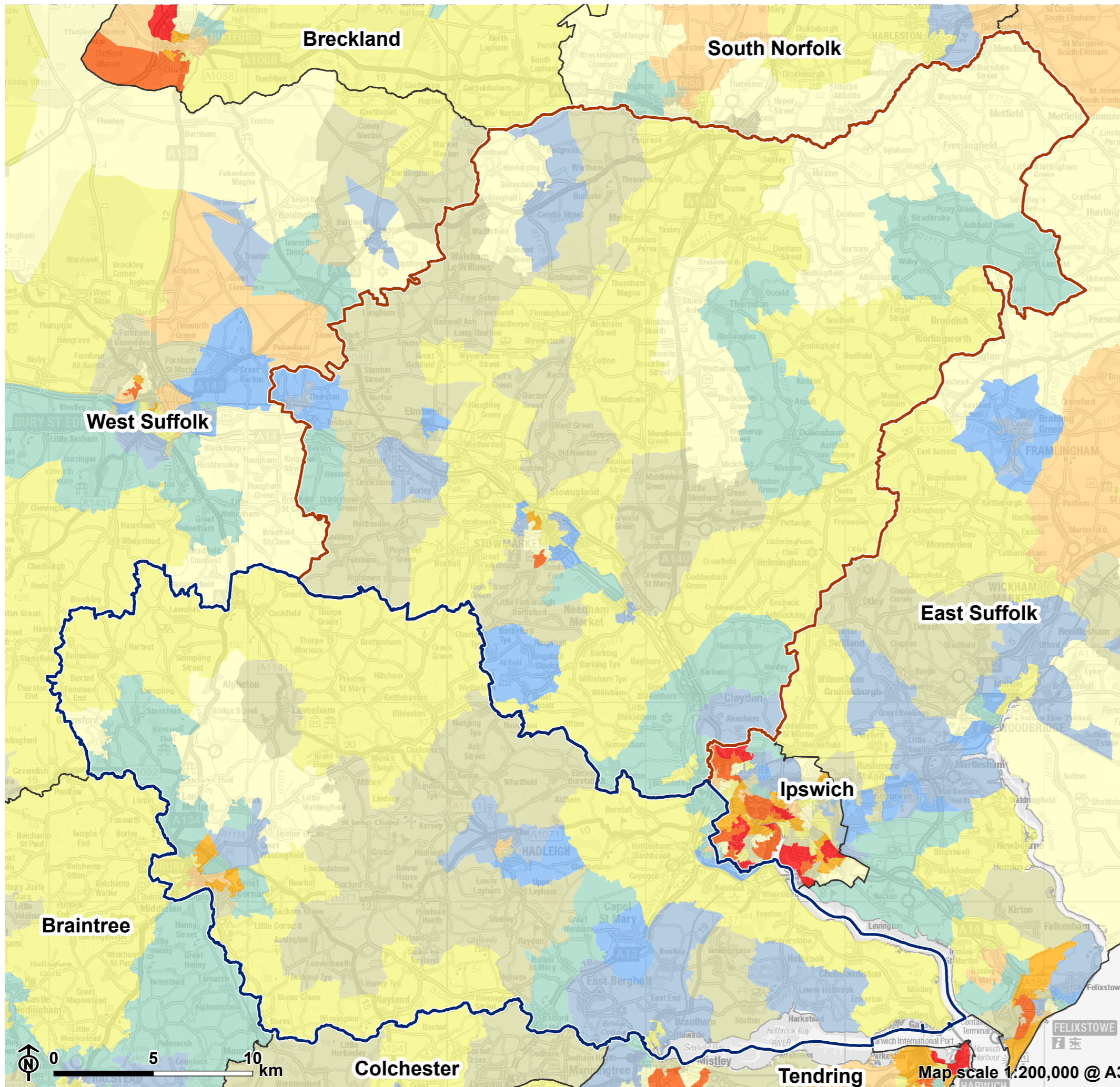


- Mid Suffolk District
- Babergh District
- Neighbouring local authority
- GP practice
- Hospital
- Primary school
- Secondary school
- Specialist school
- Further education





**Figure 3.2: Indices of Multiple Deprivation (IMD)**



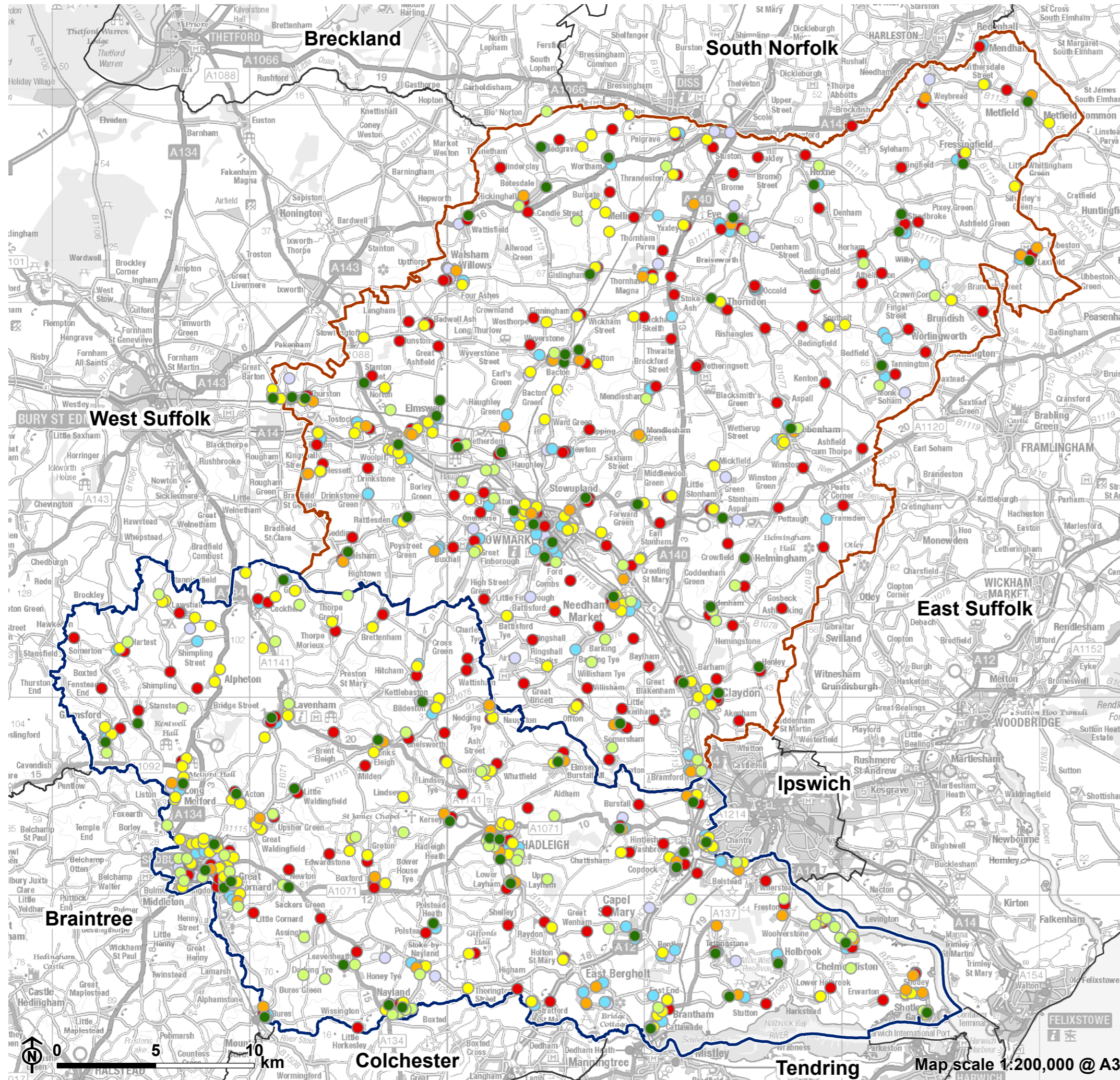
- Mid Suffolk District
  - Babergh District
  - Neighbouring local authority
- Index of Multiple Deprivation (%)**
- 0 - 10 (most deprived)
  - 10 - 20
  - 20 - 30
  - 30 - 40
  - 40 - 50
  - 50 - 60
  - 60 - 70
  - 70 - 80
  - 80 - 90
  - 90 - 100 (least deprived)

Map scale 1:200,000 @ A3





Figure 3.3: Open space



- Mid Suffolk District
  - Babergh District
  - Neighbouring local authority
- Open space**
- Park and recreation ground
  - Accessible natural green space
  - Allotment
  - Amenity greenspace
  - Cemeteries and churchyard
  - Provision for children and teenagers
  - Outdoor sport or sports club



# Chapter 4

## Economy

### Policy context

#### National

**4.1** The **NPPF (2023)**<sup>86</sup> contains an economic objective to “*help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.*”

**4.2** It also requires that planning seeks to “create the conditions in which businesses can invest, expand and adapt” with policies required to “*set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth*”. Policies addressing the economy should also seek “*to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.*”

**4.3** Of particular relevance is the requirement for planning policies to “*recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.*”

**4.4** Planning policies are also required specifically to address support for the rural economy. Sustainable growth and expansion of all types of business and enterprise in rural areas should be supported, both through conversion of existing buildings and well-designed new buildings, while the diversification of the rural economy and promotion of sustainable rural tourism and leisure developments is also supported.

**4.5** The NPPF also supports the role of town centres as functioning at the heart of local communities. This support is required to provide for a “*positive approach to [town centres] growth, management and adaptation.*” Included within this support is a requirement to “*allocate a range of suitable sites in town centres to meet the scale and type of development needed, looking at least ten years ahead.*”

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<sup>86</sup> Department for Levelling Up, Housing and Communities (2023). National Planning Policy Framework. (see

[https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF\\_December\\_2023.pdf](https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf))



**4.6** The NPPF is supported by planning practice guidance relating to:

- **Town centres and retail (2020)**<sup>87</sup> provides guidance on planning for town centre vitality and viability, permitted development, change of use and out of town centre development.

**4.7 The Levelling-up and Regeneration Act 2023**<sup>88</sup> On 26th October 2023, the Levelling-up and Regeneration Bill received Royal Assent. The Act sets out the direction for planning and makes provisions to support the levelling-up agenda. It seeks to streamline the planning process whilst attaching greater weight to development plans. It also aims to improve infrastructure delivery with a new levy system, improve alignment between plans to address cross-boundary issues, and will introduce added protection for heritage assets. The Act also sets the stage for the reform of current system for strategic environmental assessments by providing instead for EORs designed to streamline the process for identifying and assessing the environmental impact of plans and projects. However, for now, the requirement for SEA remains, as set out in existing legislation.

**4.8 Build Back Better: Our Plan for Growth (2021)**<sup>89</sup>: Sets out a plan to 'build back better' tackling long-term problems to deliver growth that delivers high-quality jobs across the UK while supporting the transition to net zero. This will build on three core pillars of growth: infrastructure, skills and innovation.

**4.9 National Planning Practice Guidance**<sup>90</sup>: Reiterates the importance for Local Plans to include a positive strategy for town centres to enable sustainable economic growth and provide a wide range of social and environmental benefits.

**4.10 The Local Growth White Paper (2010)**<sup>91</sup>: Highlights the importance of economic policy that focusses on the delivery of strong, sustainable and balanced growth of income and employment over the long-term, growth which is broad-based industrially and geographically to provide equality of access

and opportunity and build businesses that are competitive internationally.

**4.11 Rural White Paper 2000 (Our Countryside: the future – A fair deal for rural England)**<sup>92</sup>: Sets out the Government's Rural Policy Objectives:

- To facilitate the development of dynamic, competitive and sustainable economies in the countryside, tackling poverty in rural areas.
- To maintain and stimulate communities and secure access to services which is equitable in all the circumstances, for those who live or work in the countryside.
- To conserve and enhance rural landscapes and the diversity and abundance of wildlife (including the habitats on which it depends).
- To promote government responsiveness to rural communities through better working together between central departments, local government, and government agencies and better co-operation with non-government bodies.

**4.12 LEP Network Response to the Industrial Strategy Green Paper Consultation (2017)**<sup>93</sup>: The aim of the document is to ensure that all relevant local action and investment is used in a way that maximises the impact it has across the Government's strategy. Consultation responses set out how the 38 Local Enterprise Partnerships (LEPs) will work with Government using existing and additional resources to develop and implement a long-term Industrial Strategy.

**4.13 Growth Plan 2022**<sup>94</sup>: This document makes growth the government's central economic mission, setting a target of reaching 2.5% trend rate. Sustainable growth will lead to higher wages, greater opportunities and provide sustainable funding for public services.

**4.14 Agriculture Act 2020**<sup>95</sup>: Sets out how farmers and land managers in England will be rewarded in the future with public money for "public goods" – such as better air and water

<sup>87</sup> Ministry of Housing, Communities and Local Government (2020). Town centres and retail. (see <https://www.gov.uk/guidance/ensuring-the-vitality-of-town-centres>)

<sup>88</sup> Levelling-up and Regeneration Act 2023

<sup>89</sup> HM Treasury (2021). Build Back Better: Our Plan for Growth. (see <https://www.gov.uk/government/publications/build-back-better-our-plan-for-growth/build-back-better-our-plan-for-growth-html>)

<sup>90</sup> Department for Communities and Local Government (2016). Planning Practice Guidance. (see <https://www.gov.uk/government/collections/planning-practice-guidance>)

<sup>91</sup> Department for Business, Innovation and Skills (2010). Local Growth: Realising Every Place's Potential. (see <https://www.gov.uk/government/publications/local-growth-realising-every-places-potential-hc-7961>)

<sup>92</sup> HM Government (2000). Rural White Paper (Our Countryside: the future – A fair deal for rural England). (see <http://www.tourisminsights.info/ONLINEPUB/DEFRA/DEFRA%20PDFS/RURAL%20WHITE%20PAPER%20-%20FULL%20REPORT.pdf>)

<sup>93</sup> LEP Network (2017). Response to the Industrial Strategy Green Paper Consultation. (see <https://www.lepnetwork.net/media/1470/lep-network-industrial-strategy-response-april-2017-final.pdf>)

<sup>94</sup> HM Treasury (2022). The Growth Plan 2022. (see <https://www.gov.uk/government/publications/the-growth-plan-2022-documents/the-growth-plan-2022-html#:~:text=The%20Growth%20Plan%202022%20makes,a%20perio d%20of%20high%20inflation>)

<sup>95</sup> UK Parliament (2020). Agriculture Act 2020. (see <https://www.legislation.gov.uk/ukpga/2020/21/contents/enacted/data.htm>).

quality, thriving wildlife, soil health, or measures to reduce flooding and tackle the effects of climate change, under the Environmental Land Management Scheme. These incentives will provide a vehicle for achieving the goals of the government's 25 Year Environment Plan and commitment to reach zero emissions by 2050. The Act will help farmers to stay competitive, increase productivity, invest in new technology and seek a fairer return from the marketplace.

**4.15 Agricultural Transition Plan 2021 to 2024**<sup>96</sup>: Aims to drive competitiveness, increase productivity, reduce carbon emissions, and generate fairer returns across the agricultural industry. The Transition Plan introduces several new schemes to improve the environment, animal health and welfare, and farm resilience and productivity (e.g., grants will be available for sustainable farming practices, creating habitats for nature recovery and making landscape-scale changes such as establishing new woodland and other ecosystem services).

### Sub-national

**4.16 Babergh and Mid Suffolk Economic Land Needs Assessment (2024)**<sup>97</sup>: Provides an assessment of the districts' economy and investigates the economic potential of the districts based on economic forecasting and modelling scenarios for future growth. It determines the future employment land requirements in the districts to support the identified growth for 2023-2037 and 2043 in respect of population projections.

**4.17 Babergh & Mid Suffolk Town Centres & Retail Study (2015)**<sup>98</sup>: Includes information regarding shopping habits, the assessment of retail and other town centre uses and health checks of the main towns. The study offers advice on the strengths and weaknesses of centres within the Districts and their ability to accommodate retail, leisure and other town centre uses, including the identification of potentially suitable centres. Advice is also given regarding the level and type of retail, leisure and other town centre uses that would be appropriate for the Districts considering national and local economic trends. The study provides recommendations of definitions retail related primary and secondary frontages, and

primary shopping areas for the centres, as well as a hierarchy of town centres.

**4.18 Babergh and Mid Suffolk District Councils' Economy Recovery Plan (2022)**<sup>99</sup>: The plan focuses on building resilience and future growth in the business community. The aim of the recovery plan is to provide a direction for the Councils to support businesses and communities, post COVID-19, to:

- stimulate innovation
- attract inward investment
- encourage strong economic growth

**4.19 Babergh and Mid Suffolk Infrastructure Delivery Plan (2020)**<sup>100</sup>: Aims to consider all infrastructure needs to enable sustainable development and growth supporting residents, businesses, communities, the environment and individuals. A key objective is prioritising investment into strategic services and infrastructure. The report also considers collaboration of organisations to provide funding and the phasing of infrastructure may occur depending on the degree of growth.

**4.20 Babergh and Mid Suffolk Joint Corporate Plan 2019 to 2027**<sup>101</sup>: Seeks to deliver shared priorities, in five key areas: the economy, environment, housing, wellbeing, communities and customers. The Plan provides the mechanism to be able to shape the delivery of development in the context of the Joint Corporate Plan priorities.

**4.21 New Anglia Local Enterprise Partnership Economic Strategy (2017)**<sup>102</sup>: The Economic Strategy looks ahead to 2036 but focuses on the actions that the New Anglia LEP needs to take over the next four years to secure long term success. According to the Strategy, the LEP will work across all local authorities to integrate inward investment, whilst also attracting highly skilled people. The LEP will also work with the Government to ensure that the unique contribution of the energy sector is well understood and supported.

**4.22 New Anglia Norfolk & Suffolk Economic Strategy (2022)**<sup>103</sup>: The Norfolk & Suffolk Economic Strategy outlines ambitious plans for future growth across Norfolk and Suffolk.

<sup>96</sup> Department for Environment, Food and Rural Affairs (2020). Agricultural Transition Plan 2021 to 2024. (see <https://www.gov.uk/government/publications/agricultural-transition-plan-2021-to-2024>)

<sup>97</sup> Lambert Smith Hampton (2024). Economic Land Needs Assessment. (see <https://www.babergh.gov.uk/documents/d/asset-library-54706/babergh-and-mid-suffolk-economic-land-needs-assessment-report-june-2024>)

<sup>98</sup> Carter Jonas (2015). Joint Town Centres & Retail Study. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/29-10-15-BaberghMid-Suffolk-TCRSFinal-Report.Final-Version-29.10.15.pdf>)

<sup>99</sup> BMSDC (2022). Recovery Plan 2022. (see <https://hos.lq-cms.com/wp-content/uploads/2023/03/Recovery-Plan-2022.pdf>)

<sup>100</sup> BMSDC (2020). Infrastructure Delivery Plan. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Infrastructure2020/BMSDC-IDP-Sept-2020.pdf>)

<sup>101</sup> Babergh District Council (2019). Our Joint Corporate Plan. (see <https://www.babergh.gov.uk/w/joint-corporate-plan>)

<sup>102</sup> Norfolk & Suffolk Unlimited (2017). Economic Strategy. (see <https://newanglia.co.uk/wp-content/uploads/2020/03/New-Anglia-Norfolk-Suffolk-Unlimited-Economic-Strategy-Brochure-1-1.pdf>)

<sup>103</sup> Norfolk & Suffolk Unlimited (2022). Norfolk & Suffolk Economic Strategy. (see <https://newanglia.co.uk/wp-content/uploads/2022/01/FINAL-Norfolk-and-Suffolk-economic-strategy-Jan-2022.pdf>)

Bringing together public and private sector partners with education and the VCSE sector, it sets out New Anglia Local Enterprise Partnership’s ambition for Norfolk and Suffolk. The strategy aims to make Norfolk and Suffolk:

- A higher-performing, clean, productive and inclusive economy.
- An inclusive economy with an appropriate and highly skilled workforce, where everyone benefits from clean economic growth.
- The place where high-growth businesses with aspirations choose to be.
- A well-connected place, locally, nationally and internationally.
- An international-facing economy with high-value exports.
- A centre for the UK’s clean energy sector.
- A place with a clear, defined, ambitious offer to the world.

**4.23 South East Inshore Marine Plan (2021)<sup>104</sup>:** This document introduces a strategic approach to planning within the inshore waters between Felixstowe, in Suffolk and near Dover, in Kent. It provides an evidence-based approach to inform decision-making by marine users and regulators on where activities might take place within the inshore marine plan area. The Plan will help to enhance and protect the

marine environment and achieve sustainable economic growth, whilst respecting local communities both within and adjacent to the marine plan area. Babergh and Mid Suffolk District overlaps the South East Inshore Marine Plan area. In the case of Babergh, the overlap includes the tidal extent of the Rivers Stour and Orwell.

## Current baseline

### Business sectors and employment

**4.24** The Office for National Statistics found a growth rate of 3.7% in 2022 for businesses in the East of England, which is the joint fifth highest for region’s in the UK, alongside the North East<sup>105</sup>. Furthermore, 99.6% of registered businesses in the wider County of Suffolk are Small or Medium-Sized Enterprises (SMEs) with survival rates consistently better than the UK average<sup>106</sup>.

**4.25** Babergh and Mid Suffolk Districts are made up mainly of rural areas with a range of market and smaller towns, along with some industrial and enterprise sites. Therefore, the Districts contain a range of businesses such as agriculture, construction, technology and retail. The table below shows the breakdown of business stock in the Districts, which is predominantly characterised by Business and Professional Services in Babergh, and construction work in both Districts.

**Table 4.1 Business stock by sector in 2016<sup>107</sup>**

|                                    | Babergh                       |                               | Mid Suffolk                   |                               |
|------------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|
|                                    | Number of existing businesses | Number of existing businesses | Number of existing businesses | Number of existing businesses |
| Agriculture                        | 110                           | 3%                            | 220                           | 6%                            |
| Business and Professional Services | 1330                          | 41%                           | 1440                          | 40%                           |
| Computing and Technology           | 110                           | 3%                            | 100                           | 3%                            |
| Construction                       | 420                           | 13%                           | 480                           | 13%                           |
| Education                          | 90                            | 3%                            | 100                           | 3%                            |

<sup>104</sup> HM Government (2021). South East Inshore Marine Plan. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1004493/FINAL\\_South\\_East\\_Marine\\_Plan\\_1.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004493/FINAL_South_East_Marine_Plan_1.pdf))

<sup>105</sup> Office for National Statistics (2023). Business Demography UK 2022. [Business demography, UK - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/business-demography)

<sup>106</sup> BMSDC (n.d.). Open for Business Strategy: Where and how do the District Councils make a difference. (see <https://www.midsuffolk.gov.uk/assets/Economic-Development/OpenForBusiness-Strategy-with-links.pdf>)

<sup>107</sup> Lichfields (2017). Ipswich Economic Area Sector Needs Assessment. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Ipswich-Economic-Area-Sector-Needs-Assessment-Sept-2017.pdf>)

|                             | Babergh                       |                               | Mid Suffolk                   |                               |
|-----------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|
|                             | Number of existing businesses | Number of existing businesses | Number of existing businesses | Number of existing businesses |
| Energy, Waste and Utilities | 20                            | 1%                            | 30                            | 1%                            |
| Health and Care             | 200                           | 6%                            | 220                           | 6%                            |
| Hospitality and Leisure     | 250                           | 8%                            | 210                           | 6%                            |
| Manufacturing               | 230                           | 7%                            | 250                           | 7%                            |
| Retail                      | 250                           | 8%                            | 210                           | 6%                            |
| Transport and Logistics     | 70                            | 2%                            | 120                           | 3%                            |
| <b>Wholesale</b>            | <b>200</b>                    | <b>6%</b>                     | <b>240</b>                    | <b>7%</b>                     |

**4.26** As of 2023, Babergh has around 59,000sqm of office floorspace and Mid Suffolk around 64,000sqm. These are the lowest levels of provision of all the Suffolk authorities, with Babergh contributing 8% and Mid Suffolk 9% of the total stock. Between 2013 and 2023, Babergh experienced a net loss of 16% of office floorspace, which is higher than the regional level of 7% loss. Conversely, Mid Suffolk is the only district in Suffolk to have experienced positive growth in office stock in this period (+5%). In terms of take-up, both districts have slightly negative net absorption of office floorspace over the ten-year period, with office vacancy rates trending slightly above and slightly below the Suffolk average of 3.5% for Babergh and Mid Suffolk respectively<sup>108</sup>.

**4.27** Both districts have seen a net gain in industrial floorspace between 2013 and 2023. Babergh saw increase of 47,000sqm (+8%) and Mid Suffolk 49,000sqm (+6%), representing the highest and second highest growth in industrial stock levels of any of the Suffolk authorities over this period. There has been a strong take up of industrial floorspace in both districts in the ten-year period<sup>109</sup>.

**4.28** Babergh and Mid Suffolk have economies that support 38,300 and 42,600 jobs respectively, representing the smallest economies of the Suffolk authorities<sup>110</sup>.

**4.29** As of September 2023, 72.8% (41,500) of the residents in Babergh District were economically active compared to 70.6% (45,200) in Mid Suffolk. The regional average at the time was 80.8% and the national average was 78.8%<sup>111</sup>. In Babergh, 14.8% of the economically active residents were self-employed compared to 12.7% in Mid Suffolk. In 2023, 62.5% of total employees were full-time and 37.5% were part-time in Babergh, whilst 68.6% were full-time and 31.4% were part-time in Mid Suffolk. In addition, 3.5% (1,400) of Babergh residents were unemployed and 3.2% (1,500) of Mid Suffolk residents. This is lower than the regional (3.8%) and national averages (3.7%).

**4.30** In 2023, gross weekly pay in Babergh was around £574.50 compared to £596.30 in Mid Suffolk. The average for the East of England is £673.50 and the national average was £682.60. Therefore, pay in both Babergh and Mid-Suffolk is below the national average<sup>112</sup>.

**4.31** The table below shows that, in terms of numbers of jobs, the most significant occupations in the Districts are in manufacturing, wholesale and retail, accommodation and food service activities, professional scientific and technical activities, education, and human health and social work activities. In Mid Suffolk, administrative and support service activities are also an important source of employment.

<sup>108</sup> Lambert Smith Hampton (2024) Babergh and Mid Suffolk Economic Land Needs Assessment. Available at: [babergh-and-mid-suffolk-economic-land-needs-assessment-report-june-2024](https://www.lscplanning.com/Portals/0/Reports/2024/Babergh%20and%20Mid%20Suffolk%20Economic%20Land%20Needs%20Assessment%20Report%20June%202024.pdf)

<sup>109</sup> Ibid.

<sup>110</sup> Ibid.

<sup>111</sup> Office for National Statistics (2023). Labour Market Profile for Babergh and Mid Suffolk, both separate webpages. (see <https://www.nomisweb.co.uk/reports/lmp/la/1946157239/report.aspx?town=babergh#tabearn> and <https://www.nomisweb.co.uk/reports/lmp/la/1946157242/report.aspx?town=mid%20suffolk#tabearn>)

<sup>112</sup> Ibid

Table 4.2 Employee jobs by industry<sup>113</sup>

|  | Babergh       |       | Mid Suffolk   |       |
|--|---------------|-------|---------------|-------|
|  | Employee jobs |       | Employee jobs |       |
| Agriculture, forestry and fishing                                    | 1,500         | 4%    | 2,500         | 6%    |
| Mining and Quarrying   | 10            | 0%    | 10            | 0%    |
| Manufacturing  | 4,500         | 14.1% | 5,000         | 14.3% |
| Electricity, Gas, Steam and Air Conditioning Supply                  | 10            | 0%    | 150           | 0.4%  |
| Water Supply; Sewerage, Waste Management and Remediation Activities  | 250           | 0.8%  | 450           | 1.3%  |
| Construction   | 2,000         | 6.2%  | 5,000         | 14.3% |
| Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles | 6,000         | 18.8% | 5,000         | 14.3% |
| Transportation and Storage   | 1,250         | 3.9%  | 2,500         | 7.1%  |
| Accommodation and Food Service Activities                            | 3,000         | 9.4%  | 2,250         | 6.4%  |
| Information and Communication  | 1000          | 3.1%  | 700           | 2.0%  |
| Financial and Insurance Activities                                   | 400           | 1.2%  | 250           | 0.7%  |
| Real Estate Activities   | 450           | 1.4%  | 400           | 1.1%  |
| Professional Scientific and Technical Activities                     | 2,500         | 7.8%  | 2,250         | 6.4%  |
| Administrative and Support Service Activities                        | 2,000         | 6.2%  | 3,2,250       | 6.4%  |
| Public Administration and Defence; Compulsory Social Security        | 250           | 0.8%  | 800           | 2.3%  |
| Education  | 3,500         | 10.9% | 3,000         | 8.6%  |
| Human Health and Social Work Activities                              | 3,500         | 10.9% | 3,500         | 10.0% |
| Arts, Entertainment and Recreation                                   | 800           | 2.5%  | 900           | 2.6%  |
| Other Services Activities  | 450           | 1.4%  | 500           | 1.4%  |

**Economic growth challenges and priorities**

**4.32** Babergh and Mid Suffolk released an "Open for Business Strategy" in 2018 which communicates the Districts' approach in supporting economic growth and helping businesses,

communities and their broad network of partners. The report aims to encourage collaboration when tackling both short-term and long-term aspirations.

**4.33** The priority in Babergh is to "shape, influence and provide the leadership to enable growth while protecting and

<sup>113</sup> NOMIS (2021). Employee Jobs by Industry. (see <https://www.nomisweb.co.uk/reports/lmp/la/1946157239/report.aspx?town=Babergh#tabempunemp>)



enhancing our environment". In Mid Suffolk, the priority is to "lead and shape the local economy by promoting and helping to deliver sustainable economic growth, which is balanced with respect for wildlife, heritage and the natural and built environment".

**4.34** A Local Enterprise Partnership for Norfolk and Suffolk, New Anglia, has 10 enterprise zones, two of which are in Babergh and Mid Suffolk<sup>114</sup>. These are Stowmarket Enterprise Park, Mill Lane and Sproughton Enterprise Park, Sproughton. A Food Enterprise Zone known as Jimmy's Farm site is also present within BMSDC.

**4.35** The main employment sites and enterprise zones are shown in **Figure 4.1**.

**4.36** The main issues impacting on growth in Babergh and Mid Suffolk are as follows<sup>115</sup>:

- Several large local strategic sites (including designated Enterprise Zone sites) have potential for significant job generation but need support, such as the development of infrastructure, services and utilities.
- Limited premises options for SMEs, including starter, incubator, clustering businesses and then scaling-up 'graduation' space.
- Slow broadband speeds and limited mobile coverage in rural areas.
- Lower skills and educational attainment than regional or national averages.
- High levels of outward commuting partially due to the imbalance of housing and jobs. Both authorities also fall within the Ipswich Travel to Work Area.

- Low levels of entrepreneurship and business start-up, but all also fewer business failures.
- Market towns that need help improving their vitality, so the towns become designation areas and play to their strengths.
- Limited access to higher education and adult learning services and support across the wider area however, this is improving.
- Limited rural infrastructure, particularly road and digital networks, as well as access to skilled individuals with specialist and higher-level skills or leadership affect the ability to recruit young people.
- Place of interest that have inherent barriers to growth and development, such as National Landscapes (previously known as Areas of Outstanding Natural Beauty) or Sites of Special Scientific Interest (SSSI).

#### Town centres and retail

**4.37** The current Town Centre and Retail Study for Babergh and Mid Suffolk was published in September 2015. According to the study, there has been a decline in shopping centre consumer patterns.

**4.38** BMSDC have been collecting data on shop occupancy and vacancy rates in their key towns and service centres for some years. The results are set out in the below table and shows highest vacancy rates to be in Needham Market, followed by Sudbury.

**Table 4.3 Town Centre Vacancy Rates**

| Town Centre           | No. of Shops |        |          | Floorspace (m <sup>2</sup> ) |        |          |
|-----------------------|--------------|--------|----------|------------------------------|--------|----------|
|                       | Total        | Vacant | % vacant | Total                        | Vacant | % vacant |
| Sudbury (2019)        | 260          | 19     | 7.31%    | 42,899                       | 2,996  | 6.98%    |
| Hadleigh (2019)       | 114          | 5      | 4.39%    | 23,129.5                     | 438    | 1.89%    |
| Stowmarket (2019)     | 47           | 0      | 0%       | 8,117.7                      | 112    | 0%       |
| Needham Market (2019) | 79           | 8      | 10.13%   | 8,117.7                      | 112    | 0%       |

<sup>114</sup> BMSDC (n.d.). Enterprise Zones. (see <https://www.babergh.gov.uk/business/economic-development/space-to-innovate-enterprise-zones/>)

<sup>115</sup> BMSDC (n.d.). Open for Business Strategy: Where and how do the District Councils make a difference. (see <https://www.babergh.gov.uk/assets/Economic-Development/OpenForBusiness-Strategy-with-links.pdf>)

### Patterns of working

**4.39** Homeworking has been steadily rising in recent decades. However, the COVID-19 pandemic accelerated this shift. ONS data from 2020 shows that Babergh and Mid Suffolk have higher levels of home working compared to UK levels, as shown in **Table 4.4**. It should be noted that this data is taken from a 2020 ONS dataset and therefore is likely to start showing the impacts of COVID-19.

**Table 4.4 Percentage of work from home status<sup>116</sup>**

|             | Never | Mainly | Recently | Occasionally |
|-------------|-------|--------|----------|--------------|
| UK          | 64.1% | 8.3%   | 17.8%    | 9.8%         |
| Babergh     | 58.0% | 10.0%  | 14.2%    | 17.8%        |
| Mid Suffolk | 54.7% | 9.4%   | 19.8%    | 16.1%        |

**4.40** More recent ONS data (September 2022 to January 2023) shows that at a national level, the overall levels of homeworking have only increased slightly on pre-pandemic levels. However, the biggest increase has been the proportions of hybrid workers. The balance of hybrid working is still something many businesses are exploring and working practices will have an impact on determining future floorspace requirements across various sectors.

**Table 4.5 Key sustainability issues and opportunities for the Joint Local Plan Part 2 to address them**

| Key sustainability issues for Babergh and Mid Suffolk  | Opportunities for the Joint Local Plan Part 2 to address the key sustainability issues   | Relevant SA objectives         |
|--|--|--------------------------------|
| There are a number of barriers to economic growth within BMSDC, including educational attainment and a lack of suitable premises for SMEs. | The JLP Part 2 offers the opportunity to create and safeguard jobs through targeted allocation of employment sites, including for office and industrial spaces and the promotion of the rural economy, as well as promoting access and opportunity for all. Furthermore, the spatial distribution of housing allocations will help to identify where population growth is expected, which will help to inform decisions about where to invest in educational facilities and infrastructure to support business growth, | SA objectives 1, 2, 14 and 15. |
| There has been a decline in shopping consumer patterns, with a number of vacant units present in key towns and service centres.            | The JLP Part 2 presents an opportunity to protect and promote the High Street in the key towns and service centres through designating specific areas within these towns and centres for commercial and retail development, and incentivising adaptive reuse of existing units in key towns and centres for commercial purposes.   | SA objectives 14 and 15.       |

**4.41** An occupier survey<sup>117</sup> carried out across the country in 2023 indicated that while there has been a rising trend in returning to the office in recent years, hybrid working patterns remain entrenched. While there is an overall reduction in office floorspace requirements of 15-20% at a national level, there are differing trends based on the size of businesses. Smaller companies are less likely to move or report a need to move. As Babergh and Mid Suffolk have an office base of predominantly smaller businesses, there is likely to be less impact on office floorspace requirements than at national level.

### Future baseline and likely evolution without the Part 2 Joint Local Plan

**4.42** It is uncertain how the job market will change without the implementation of the Part 2 JLP. The degree of change in local circumstances will be influenced by economic issues at the national and international level. This includes the uncertainties following the UK's exit from the EU.

### Key sustainability issues

**4.43** The key sustainability issues for the economy, and the opportunities for the Joint Local Plan Part 2 to address them are shown in **Table 4.5**.

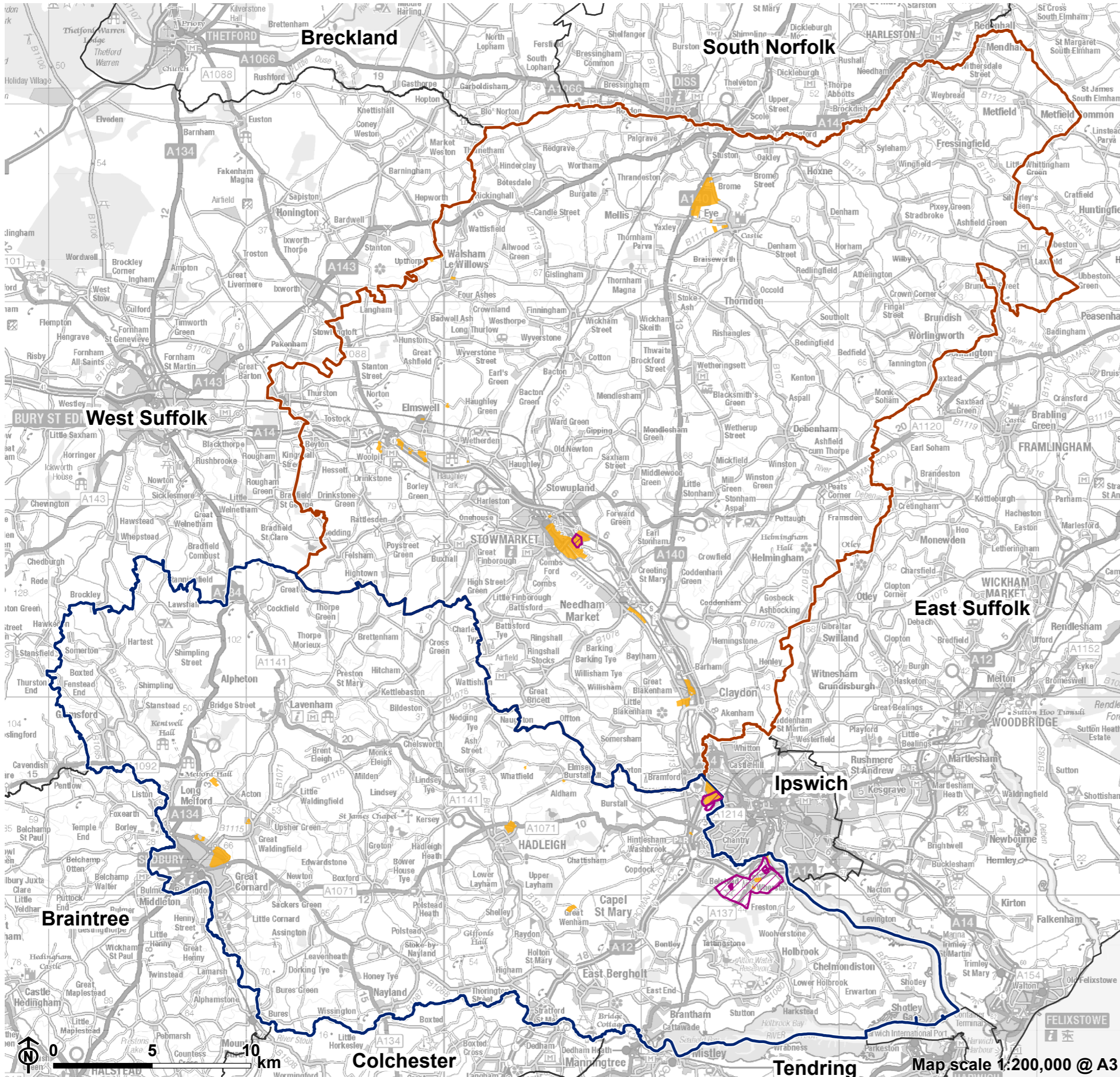
<sup>116</sup> ONS (2020) as in Lambert Smith Hampton (2024) Babergh and Mid Suffolk Economic Land Needs Assessment. Available at:

[babergh-and-mid-suffolk-economic-land-needs-assessment-report-june-2024](#)






<sup>117</sup> Ibid. LSH Occupier Survey (May 2023)

| Key sustainability issues for Babergh and Mid Suffolk  | Opportunities for the Joint Local Plan Part 2 to address the key sustainability issues  | Relevant SA objectives                 |
|--|---|--|
| <p>Babergh is not identified as a known destination for business growth, partly because of its geographical location between Ipswich, Colchester and Bury St Edmunds, which has led to high levels of outward commuting, particularly as both authorities also fall within the Ipswich Travel to Work Area. Also, in both Districts, the number of economically active residents is lower than the regional and national averages.</p> | <p>The JLP Part 2 presents an opportunity to develop Babergh's reputation as a business growth destination and provide employment development where needed through site allocations, although it will continue to face competition from other areas with more established reputations, networks and infrastructure.</p> | <p>SA objectives 14 and 15.</p>        |
| <p>There is an uneven distribution of services throughout BMSDC and limited infrastructure in place to support economic development.</p>   | <p>The JLP Part 2 offers an opportunity to address infrastructure issues across BMSDC through updating the settlement hierarchy to give priority to areas with potential for economic development, and therefore supporting economic development.</p>   | <p>SA objectives 2, 14, 15 and 16.</p> |





**Figure 4.1: Employment sites and Enterprise Zones**

-  Mid Suffolk District
-  Babergh District
-  Neighbouring local authority
-  Employment site
-  Enterprise Zone



# Chapter 5

## Transport, air quality and noise

### Policy context

#### National

**5.1** The **NPPF (2023)**<sup>118</sup> requires that “transport issues should be considered from the earliest stages of plan-making”. The scale, location and density of development should reflect “opportunities from existing or proposed transport infrastructure”. To help reduce congestion and emissions and improve air quality and public health the planning system should focus significant development “on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.” The draft revised framework also requires that planning policies support an appropriate mix of uses across an area to further help reduce the need to travel as well as the provision of high-quality walking and cycling network.

**5.2** While the framework promotes the use and development of sustainable transport networks it also requires that “where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development” should be identified and protected.

**5.3** The NPPF also states that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued soil and the economic and other benefits of the best and most versatile agricultural land. Policies should also prevent new and existing development from “*contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution.*”

**5.4** The NPPF is supported by planning practice guidance relating to:

- **Transport evidence bases in plan making and decision taking (2015)**<sup>119</sup>: Provides guidance to help local authorities assess and reflect transport needs in Local Plan making.

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<sup>118</sup> Department for Levelling Up, Housing and Communities (2023). National Planning Policy Framework. (see [https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF\\_December\\_2023.pdf](https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf))

<sup>119</sup> Ministry of Housing, Communities and Local Government (2015). Transport evidence bases in plan making and decision taking. (see <https://www.gov.uk/guidance/transport-evidence-bases-in-plan-making-and-decision-taking>)



- **Travel Plans, Transport Assessments and Statements (2014)**<sup>120</sup>: Provides advice on when Transport Assessments and Transport Statements are required, and what they should contain.
- A target on ambient PM2.5 concentrations.
- **Air quality (2019)**<sup>121</sup> provides guidance on air quality considerations planning needs to take into account.

**5.5 National Planning Practice Guidance**<sup>122</sup>: Reiterates the requirement for local planning authorities to undertake an assessment of the transport implications of reviewing their Local Plan.

**5.6 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland**<sup>123</sup>: Sets out a way forward for work and planning on air quality issues by setting out the air quality standards and objectives to be achieved. It introduces a new policy framework for tackling fine particles and identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives. The objectives of the Strategy are to:

- Further improve air quality in the UK from today and long term.
- Provide benefits to health quality of life and the environment.

**5.7 The Air quality strategy for England (2023)**<sup>124</sup>: Sets out Defra's framework for local authorities to make best use of their powers and make air quality improvements for their communities. It also sets out the actions expected of local authorities in support of the government's long-term air quality goals, including new PM2.5 targets.

**5.8 Future of Transport: supporting rural transport innovation (2023)**<sup>125</sup>: Shows how innovative and emerging transport technologies could address some of the major

challenges in rural communities. It highlights the importance of transport to everyday life rural life and provides guiding principles for the introduction of new technologies and services.

**5.9 Decarbonising Transport: Setting the Challenge (2020)**<sup>126</sup>: The Transport Decarbonisation Plan sets out actions for government, businesses and society to significantly reduce carbon emissions from across every single mode of transport by 2050. Six strategic priorities for the Transport Decarbonisation Plan include:

- Accelerating modal shift to public and active transport;
- Decarbonisation of road vehicles;
- Decarbonising how we get our goods;
- Place-based solutions;
- UK as a hub for green transport technology and innovation; and
- Reducing carbon in a global economy.

**5.10 Decarbonising Transport: A Better, Greener Britain (2021)**<sup>127</sup>: Sets out the Government's commitments in relation to and the actions needed to decarbonise the entire transport system in the UK. The document follows on from the Decarbonising Transport: Setting the Challenge report published in 2020. It commits the UK to phasing out the sale of new diesel and petrol heavy goods vehicles by 2040, subject to consultation, in addition to phasing out the sale of polluting cars and vans by 2035. The document also sets out how the government will improve public transport and increase support for active travel, as well as creating a net zero rail network by 2050, ensuring net zero domestic aviation emissions by 2040, and a transition to green shipping.

**5.11 The Cycling and Walking Investment Strategy Report to Parliament (2022)**<sup>128</sup>: Sets out the objectives and financial resources for cycling and walking infrastructure. It states the

<sup>120</sup> Ministry of Housing, Communities and Local Government (2014). Travel Plans, Transport Assessments and Statements. (see <https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements>)

<sup>121</sup> Ministry of Housing, Communities and Local Government (2019). Air quality. (see <https://www.gov.uk/guidance/air-quality--3>)

<sup>122</sup> Ministry of Housing, Communities & Local Government (last updated 1 October 2019). Planning Practice Guidance. (see <https://www.gov.uk/government/collections/planning-practice-guidance>).

<sup>123</sup> Defra (2011). The air quality strategy for England, Scotland, Wales and Northern Ireland: Volume 1. (see <https://www.gov.uk/government/publications/the-air-quality-strategy-for-england-scotland-wales-and-northern-ireland-volume-1>)

<sup>124</sup> Department for Environment, Food & Rural Affairs (2023) The air quality strategy for England (see <https://www.gov.uk/government/publications/the-air-quality-strategy-for-england>)

<sup>125</sup> Department for Transport (2023) Future of Transport: supporting rural transport innovation (see <https://www.gov.uk/government/publications/future-of-transport-supporting-rural-transport-innovation>)

<sup>126</sup> Department for Transport (2020). Decarbonising Transport: Setting the Challenge. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/932122/decarbonising-transport-setting-the-challenge.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf))

<sup>127</sup> Department for Transport (2021). Decarbonising Transport: A Better, Greener Britain. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf))

<sup>128</sup> Secretary for Transport (2022). Cycling and Walking Investment Strategy Report to Parliament 2022. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1087944/Cycling-and-walking-investment-strategy-report-to-Parliament-2022-web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1087944/Cycling-and-walking-investment-strategy-report-to-Parliament-2022-web.pdf))

Government's long-term ambition is to make walking and cycling the natural choices for shorter journeys. The report also highlights the Government's objectives to be achieved by 2025 of doubling cycling activities, increasing walking activity and increasing the percentage of children that usually walk to school.

#### **5.12 Department for Transport, The Road to Zero (2018)<sup>129</sup>:**

Sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

**5.13 Transport Investment Strategy (2017)<sup>130</sup>:** Sets the strategy for investment in transport infrastructure in the UK. It includes four objectives that the strategy aims to achieve:

- Create a more reliable, less congested, and better connected transport network that works for the users who rely on it;
- Build a stronger, more balanced economy by enhancing productivity and responding to local growth priorities;
- Enhance our global competitiveness by making Britain a more attractive place to trade and invest; and
- Support the creation of new housing.

**5.14 Department for Transport, Road Investment Strategy 2: 2020-2025<sup>131</sup>:** The second Road Investment Strategy sets a long-term strategic vision for the network. It specifies the performance standards Highways England must meet, lists planned enhancement schemes expected to be built and states the funding that will be made available by the DfT during the second Road Period, which covers 2020/21 to 2024/25.

**5.15 Highways England Sustainable Development Strategy and Action Plan (2017)<sup>132</sup>:** The strategy is designed to communicate the Highways England's approach and priorities for sustainable development to its key stakeholders.

Highways England aims to ensure its action in the future will further reduce the impact of its activities seeking a long-term and sustainable benefit to the environment and the communities it serves. The action plan describes actions that will enable the company to deliver sustainable development and to help protect and improve the environment.

**5.16 Environmental Improvement Plan 2023<sup>133</sup>:** The Environmental Improvement Plan 2023 for England is the first revision of the 25 Year Environment Plan. It builds on the vision of 25 Year Environment Plan with a new plan setting out how Defra will work with landowners, communities and businesses to deliver each of its goals for improving the environment, matched with interim targets to measure progress. Under the plan the Government will protect 30% of England's land and sea for nature. The document identifies ten goals upon which action will be focused. Of the goals included in the Environmental Improvement Plan 2023, those of relevance in terms of the protection of air quality are: Goal 2: clean air.

**5.17 UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations<sup>134</sup>:** Sets out the Government's ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra-low emission vehicles (ULEVs), a £290 million National Productivity Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help local authorities to prepare Air Quality Action Plans and improve air quality, an £89 million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

**5.18 The Air Quality Standards Regulations (2016)<sup>135</sup>:** Set out limits on concentrations of outdoor air pollutants that impact public health, most notably particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO<sub>2</sub>). It also sets out the procedure and requirements for the designation of Air Quality Management Areas (AQMAs).

**5.19 Clean Air Strategy 2019<sup>136</sup>:** Sets out the comprehensive action that is required from across all parts of government and society to meet these goals. This will be underpinned by new

<sup>129</sup> Department for Transport (2018). The Road to Zero. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/739460/road-to-zero.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf))

<sup>130</sup> Department for Transport (2017). Transport Investment Strategy. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/918490/Transport\\_investment\\_strategy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/918490/Transport_investment_strategy.pdf))

<sup>131</sup> Department for Transport and Highways England (2022). Road Investment Strategy 2 (RIS2): 2020 to 2025. (see

<sup>132</sup> Highways England (2017). Highways England Sustainable Development Strategy and Action Plan. (see <https://www.gov.uk/government/publications/road-investment-strategy-2-ris2-2020-to-2025>)

<sup>133</sup> HM Government (2023). Environmental Improvement Plan 2023. (see <https://www.gov.uk/government/publications/environmental-improvement-plan>).

<sup>134</sup> Department for Environment Food and Rural Affairs and Department for Transport (2017). UK plan for tackling roadside nitrogen dioxide concentrations. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/633269/air-quality-plan-overview.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-plan-overview.pdf))

<sup>135</sup> The Air Quality Standards (Amendment) Regulations 2016

<sup>136</sup> DEFRA (2019). Clean Air Strategy 2019. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/770715/clean-air-strategy-2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf))

England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will support the creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms. The UK has set stringent targets to cut emissions by 2020 and 2030.

**5.20 The Environment Act 2021**<sup>137</sup> sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. It also establishes the Office for Environmental Protection which will act as an impartial and objective body for the protection and improvement of the environment. The Act sets out legislation which covers:

- Resource efficiency, producer responsibility, and the management, enforcement and regulation of waste;
- Local air quality management frameworks and the recall of motor vehicles etc; and
- Plans and proposals for water resources, drainage and sewerage management, storm overflows, water quality and land drainage.

**5.21 Establishing the Best Available Techniques for the UK (UK BAT) (2022)**<sup>138</sup> sets out a new framework that aims to improve industrial emissions and protect the environment through the introduction of a UK BAT regime. It aims to set up a new structure of governance with a new independent body in the form of Standards Council and the Regulators Group, consisting of government officials and expert regulators from all UK nations. It aims to also establish a new UK Air Quality Governance Group to oversee the work of the Standards Council and the delivery of the requirements under this new framework. It is anticipated that the BATC for the first four industry sectors will be published in the second half of 2023.

**5.22 The Environmental Noise Regulations (2018)**<sup>139</sup> apply to environmental noise, mainly from transport. The regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas. They also require the preparation of Noise Action Plans to provide a framework to manage environmental noise and its effects.

These Action Plans identify Important Areas (areas exposed to the highest levels of noise) and suggest ways the relevant authorities can reduce these. Major airports and those which affect large urban areas are also required to produce and publish their own Noise Action Plans separately.

### Sub-national

**5.23 Babergh and Mid Suffolk Economic Land Needs Assessment (2024)**<sup>140</sup>: Provides an assessment of the districts' economy and investigates the economic potential of the districts based on economic forecasting and modelling scenarios for future growth. It determines the future employment land requirements in the districts to support the identified growth for 2023-2037 and 2043 in respect of population projections.

**5.24 Suffolk's Local Transport Plan 2011-2031**<sup>141</sup>: is a two-part plan that is currently in the process of being reviewed. The first part sets out the 20-year strategy that highlights the Council's long-term ambitions for transport and the second part is a four year implementation plan demonstrating how the Council will address the issues identified in the longer-term transport strategy.

**5.25 Babergh and Mid Suffolk Infrastructure Delivery Plan (2020)**<sup>142</sup>: Aims to consider all infrastructure needs to enable sustainable development and growth supporting residents, businesses, communities, the environment and individuals. A key objective is prioritising investment into strategic services and infrastructure. The report also considers collaboration of organisations to provide funding and the phasing of infrastructure may occur depending on the degree of growth.

**5.26 Suffolk Travel Plan Guidance (2022)**<sup>143</sup>: promotes best practice in travel planning and consistency across Suffolk in support of national and local policy requirements. The guidance provides clarity to both stakeholders and developers involved in the planning process.

<sup>137</sup> HM Government (2021). Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

<sup>138</sup> DEFRA (2022). Establishing the Best Available Techniques for the UK (UK BAT). (see <https://www.gov.uk/government/publications/establishing-the-best-available-techniques-for-the-uk-uk-bat/establishing-the-best-available-techniques-for-the-uk-uk-bat#current-situation>).

<sup>139</sup> HM Government (2018). The Environmental Noise (England) Regulations. (see <https://www.legislation.gov.uk/uksi/2018/1089/contents/made>)

<sup>140</sup> Lambert Smith Hampton (2024). Economic Land Needs Assessment. (see [https://www.babergh.gov.uk/documents/d/asset-](https://www.babergh.gov.uk/documents/d/asset-library-54706/babergh-and-mid-suffolk-economic-land-needs-assessment-report-june-2024)

[library-54706/babergh-and-mid-suffolk-economic-land-needs-assessment-report-june-2024](https://www.babergh.gov.uk/documents/d/asset-library-54706/babergh-and-mid-suffolk-economic-land-needs-assessment-report-june-2024))

<sup>141</sup> Suffolk County Council (2019). Suffolk Local Transport Plan. (see <https://www.suffolk.gov.uk/roads-and-transport/transport-planning/transport-planning-strategy-and-plans/>)

<sup>142</sup> BMSDC (2020). Infrastructure Delivery Plan. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Infrastructure2020/BMSDC-IDP-Sept-2020.pdf>)

<sup>143</sup> Suffolk County Council (2022). Suffolk Travel Plan Guidance. (see <https://www.suffolk.gov.uk/asset-library/imported/2022-09-13-suffolk-travel-plan-guidance-third-edition-lo-res.pdf>)

**5.27 Babergh and Mid Suffolk District Councils' Local Cycling and Walking Infrastructure Plan (2021)**<sup>144</sup>: The Plan focuses specifically on active travel infrastructure, identifying cycling and walking infrastructure improvements needed. It sets out to ensure that consideration is given to cycling and walking within both local planning and transport policies and strategies, and make the case for future funding for walking and cycling infrastructure.

**5.28 Suffolk Cycling Strategy (2014-2031)**<sup>145</sup>: Reviews Suffolk's cycling landscape, sets 6 key strategies and outlines actions to help meet these strategies to achieve proposed outcomes. The report also outlines the delivery approach and governance of the strategy.

**5.29 Suffolk Walking Strategy (2015-2020)**<sup>146</sup>: The aim of the strategy is to get more people to walk in Suffolk and walking should be a 'default' choice for journeys of 20 minutes walking time or less. The report sets out aims, actions and outcomes. The report also outlines the delivery approach and governance of the strategy.

## Current baseline

**5.30** The transport network of Babergh and Mid Suffolk is shown in **Figure 5.3**.

### Road network

**5.31** The key components of the road network of Babergh and Mid Suffolk are:

- The A14, which is an important corridor for moving goods as it connects the port of Felixstowe with the Midlands and the A1, via Ipswich, Bury St Edmunds, Cambridge, and Huntingdon. Stowmarket and Needham Market are located just to the south of this route, which acts as a bypass to these two towns.
- The A12, which connects London with Chelmsford, Colchester and Ipswich and on to the coastal towns of Lowestoft and Great Yarmouth. The A12 passes through the south eastern part of Babergh but does not connect into any of the market towns in the District.
- The A140, which connects the A14 just north of Ipswich with Norwich via Diss. Eye is located just to the east of this route.

- The A134, which connects Colchester and Braintree (the latter via the A131) with Bury St Edmunds, via Sudbury.
- Hadleigh does not lie on the strategic road network, although it is on the A1071, which links Sudbury with Ipswich, and the A1141 to Bury St Edmunds. In addition, the A1120 links Stowmarket and Needham Market with the A12 to the east as a cross-country route rather than going via the A14 around Ipswich.

**5.32** The remainder of the road network in the two Districts comprises primarily B roads and rural roads.

### Traffic growth and road projects

**5.33** A modelling report<sup>147</sup> tested the Councils' core set of development assumptions across the Districts made in the Local Plan. The modelling shows future traffic growth for 2026 and 2036, as a result of changing patterns of travel behaviour and predicting future traffic impacts. The growth assumptions for the modelling consider population growth and specific development locations, as well as car ownership and relative vehicle operating costs.

**5.34** The results show that whilst many junctions may be close to or exceed capacity in 2026 and 2036, there are also many parts of the network that will operate well within their theoretical capacity. For junctions where the volume to capacity is shown to approach or exceed operational capacity, the individual development proposals assessed within the model would, as part of their planning applications, need to consider additional measures to help mitigate any impact.

**5.35** In Babergh District and to the south-west of Ipswich, the Beagle roundabout (A1071/B1113/Swan Hill) is shown to have overall capacity issues, with multiple arms over-capacity in both 2026 and 2036. The A1071/Hadleigh Road signalised junction is highlighted as having capacity issues in both forecast years. Sudbury is shown to generally operate within capacity within the town itself in both forecast years. However, the southern A131 approach to/from Sudbury and A134/A1071 junction shows capacity issues in both forecast years, going over capacity in 2036. Brantham is shown to have capacity issues in both forecast years, with the A137 over capacity in both forecast years.

**5.36** In Mid Suffolk District, the A140 corridor is shown to have capacity issues at multiple locations including the A140/A1120 staggered crossroads and A140/Workhouse Road/Stoke Road

<sup>144</sup> Babergh and Mid Suffolk District Councils (2021). Local Cycling and Walking Infrastructure Plan. (see <https://www.babergh.gov.uk/documents/d/asset-library-54706/local-cycling-and-walking-infrastructure-plan-methodology-report>)

<sup>145</sup> Suffolk County Council (2014). Suffolk Cycling Strategy (2014-2031). (see <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-and-development-advice/20140619-Cycling-Strategy-booklet.pdf>)

<sup>146</sup> Suffolk County Council Suffolk Walking Strategy (2015). Active for Life: Suffolk Walking Strategy 2015-2020. (see [https://www.healthysuffolk.org.uk/uploads/Suffolk's\\_Walking\\_Strategy.pdf](https://www.healthysuffolk.org.uk/uploads/Suffolk's_Walking_Strategy.pdf))

<sup>147</sup> WSP (2020). Ipswich Strategic Planning Area Local Plan Modelling. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Transport-Modelling/2020/200115-IPSA-MR7-SCC-Hwy-Results-Report.pdf>)



junction. Stowmarket is shown to generally operate within capacity in both forecast years, though isolated link approaches to Gipping Way and Ipswich Road are shown to have capacity issues in both forecast years.

**5.37** The highway schemes outlined below are due to be in place in BMSDC by 2026 and 2036, which will help reduce congestion across both Districts:

- **Chilton Woods access road:** access road between A134 Springlands Way (new roundabout) and Acton Lane (new priority junction).
- **A1071/Swan Hill roundabout:** capacity improvements.
- **A1071/Hadleigh Road signals:** capacity improvements.
- **A1071/Poplar Lane:** signalisation as part of access arrangements for Wolsey Grange.
- **A1214 London Road:** new signalised junction part of access arrangements for Wolsey Grange.
- **A140 Eye Airfield:** roundabout improvements.

### Public transport network

**5.38** Public transport is limited in the Districts. However, there are buses and trains that operate. Suffolk County Council has a bus and train network map which shows all possible routes<sup>148</sup>.

**5.39** In Babergh, trains go from Sudbury out of the District to Marks Tey. Marks Tey railway station is on the Great Eastern Main Line and is a junction for the Sudbury Branch Line to Sudbury. Passengers can change at Marks Tey to go to London Liverpool Street. Trains can also be taken from Ipswich railway station into London Liverpool Street.

**5.40** In Mid Suffolk, trains go from Ipswich to Needham Market, Stowmarket, Elmswell, Thurston and Diss, and on to either Norwich or Bury St Edmunds and Cambridge. Direct trains to London are limited to Stowmarket only.

**5.41** There are also bus services which provide a range of routes and connect the main towns, villages and centres within the Districts. However, these services are often irregular and limited<sup>149</sup>.

**5.42** The Councils support a "Connecting Communities" initiative that collects residents from their homes and connects them with appropriate bus or train services<sup>150</sup>.

### Commuting patterns and travel behaviour

**5.43** The Districts' residents rely heavily on cars to get around and access employment, education, amenities and services, partly as a result of living in more isolated rural areas. There are many different commuting routes within the Districts and individuals commute in and out of the Districts from surrounding areas.

**5.44** Many residents that live in Mid Suffolk commute into Ipswich. Residents from all over Babergh and Mid Suffolk, including Ipswich Town commute, into London<sup>151</sup>.

**5.45** As set out in **Figure 5.2** and **Table 5.1**, around 9,086 individuals commute into Babergh District, whilst 12,243 commute out of the District. There is a net outflow of 3,157 commuters meaning that outflows are 35% higher than inflows<sup>152</sup>. Notably, Ipswich and Mid Suffolk are exceptions and have minor net commuting inflows to Babergh, as shown in **Table 5.1**.

**5.46** According to the 2021 Census, 30.7% (13,171) of the resident population in employment in Babergh work mainly from home, although the most common method used to travel to work was driving a car or a van, at 54.8% (23,542). The commuting figures show the strong relationship that Babergh has with Ipswich in particular, both for commuting inwards and outwards, although there has been a noticeable shift toward working from home in the aftermath of the COVID-19 pandemic<sup>153</sup>. A lower proportion of residents in Babergh travel less than 10km (25.3%) than the proportion at the English level (35.4%)<sup>154</sup> demonstrating the rural nature of the District and potential need for out commuting among the resident population.

**5.47** According to **Figure 5.3** and **Table 5.2**, Mid Suffolk is similar with 11,192 individuals commuting into the District and 15,156 commuting out of the District. Overall, there is a net outflow of 3,964 commuters meaning, like Babergh, outflows

<sup>148</sup> Suffolk County Council (2024). Public Transport Map. (see <https://www.suffolkonboard.com/buses/timetables/>)

<sup>149</sup> Suffolk County Council (2022). Bus timetables. (see <https://www.suffolkonboard.com/buses/timetables/>)

<sup>150</sup> Suffolk County Council (2022). Connecting Communities. (see <https://communities.suffolkonboard.com/my-area/mid-suffolk/>)

<sup>151</sup> DataShine Commute (2011). (see <https://commute.datashine.org.uk/#mode=train&direction=both&msoa=E02004447&zoom=11&lon=0.8279&lat=52.0588>)

<sup>152</sup> Lambert Smith Hampton (2024). Economic Land Needs Assessment. (see [https://www.babergh.gov.uk/documents/d/asset-](https://www.babergh.gov.uk/documents/d/asset-library-54706/babergh-and-mid-suffolk-economic-land-needs-assessment-report-june-2024)

[library-54706/babergh-and-mid-suffolk-economic-land-needs-assessment-report-june-2024](https://www.babergh.gov.uk/documents/d/asset-library-54706/babergh-and-mid-suffolk-economic-land-needs-assessment-report-june-2024))

<sup>153</sup> Public Health and Communities (2022). 2021 Census Topic Summary 4: Labour market and travel to work (see <https://www.healthysuffolk.org.uk/asset-library/Census-2021/2021-census-labour-market-and-travel-to-work.pdf>)

<sup>154</sup> ONS (2021) Census 2021: Babergh custom profile. (see <https://www.ons.gov.uk/visualisations/customprofiles/build/#E07000200>)



are 35% higher than inflows<sup>155</sup>. Mid Suffolk also has a strong relationship with Ipswich, but the District to which most people commute is West Suffolk (which contains Bury St Edmunds).

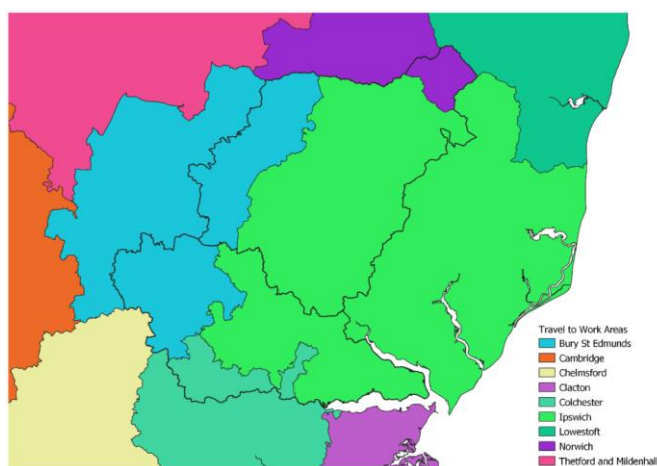
**5.48** However, based on the 2021 Census, Mid Suffolk also displays a trend towards working from home, with 31% of the working population (15,527) reported working mainly at or from home<sup>156</sup>. Similar to Babergh, a lower proportion of residents in Mid Suffolk travel less than 10km (22.4%) than the proportion at the English level (35.4%)<sup>157</sup>. This demonstrates the nature of the District and the likelihood of residents needing to commute out of the District.

**5.49** Whilst there is commuting between Babergh and Mid Suffolk, the overall numbers of journeys are not as high as they are between the two Districts and Ipswich and West Suffolk.

**5.50** Travel to Work Areas (TTWAs) are a geography created to approximate labour market areas, useful to helping build an understanding of local labour markets. They describe an area whereby at least 75% of the area's resident workforce work in the area and at least 75% of the people who work in the area also live in the area. The most recent TTWAs for the UK were published by the ONS in 2016 and collated within the 2011 Census<sup>158</sup>. **Figure 5.1** below illustrates that Babergh is divided between three TTWAs (Bury St Edmunds TTWA, Ipswich TTWA and Colchester TTWA) and Mid Suffolk is also divided between three (Bury St Edmunds TTWA, Ipswich TTWA and Norwich TTWA).

**5.51** However, TTWAs suggest very defined boundaries whereas in reality this is not the case. Further to this, commuting data from the 2021 Census provides a more up to date account of commuting patterns however corresponding TTWAs are not yet available. The 2021 Census has shown generally higher levels of home working and lower levels of overall commuting, with higher inflows from places further afield. This may be because hybrid working allows for fewer days commuting and therefore people are more willing to accept longer commutes.

**Figure 5.1 Travel to Work Areas**<sup>159</sup>



<sup>155</sup> Lambert Smith Hampton (2024). Economic Land Needs Assessment. (see <https://www.babergh.gov.uk/documents/d/asset-library-54706/babergh-and-mid-suffolk-economic-land-needs-assessment-report-june-2024>)

<sup>156</sup> Public Health and Communities (2022). 2021 Census Topic Summary 4: Labour market and travel to work. (see <https://www.healthysuffolk.org.uk/asset-library/Census-2021/2021-census-labour-market-and-travel-to-work.pdf>)

<sup>157</sup> ONS (2021) Census 2021: Mid Suffolk custom profile. (see <https://www.ons.gov.uk/visualisations/customprofiles/build/>)

<sup>158</sup> Although the 2021 Census has taken place, the data relating to TTWAs has not yet been released.

<sup>159</sup> Lambert Smith Hampton (2024). Economic Land Needs Assessment. (see <https://www.babergh.gov.uk/documents/d/asset-library-54706/babergh-and-mid-suffolk-economic-land-needs-assessment-report-june-2024>)

Figure 5.2 Babergh commuting flows<sup>160</sup>

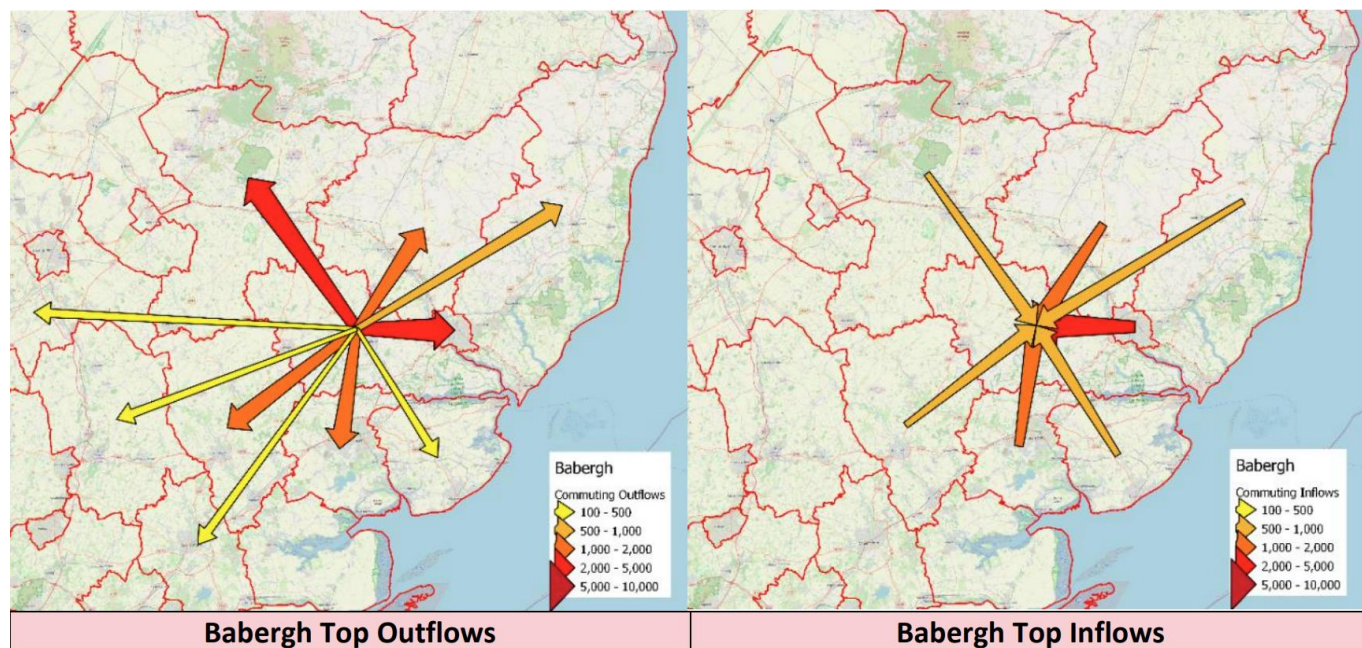


Table 5.1 Babergh commuting flows

| Babergh top outflows |       | Babergh top inflows |       |
|----------------------|-------|---------------------|-------|
| Ipswich              | 2,907 | Ipswich             | 3,112 |
| West Suffolk         | 2,214 | Mid Suffolk         | 1,247 |
| Colchester           | 1,797 | Colchester          | 1,042 |
| Braintree            | 1,101 | Braintree           | 834   |
| Mid Suffolk          | 1,091 | East Suffolk        | 779   |
| East Suffolk         | 927   | West Suffolk        | 779   |
| Tendring             | 497   | Tendring            | 641   |
| Chelmsford           | 202   |                     |       |
| Uttlesford           | 166   |                     |       |
| South Cambridgeshire | 100   |                     |       |

<sup>160</sup> Lambert Smith Hampton (2024). Economic Land Needs Assessment. (see <https://www.babergh.gov.uk/documents/d/asset-library-54706/babergh-and-mid-suffolk-economic-land-needs-assessment-report-june-2024>)

Figure 5.3 Mid Suffolk commuting flows<sup>161</sup>

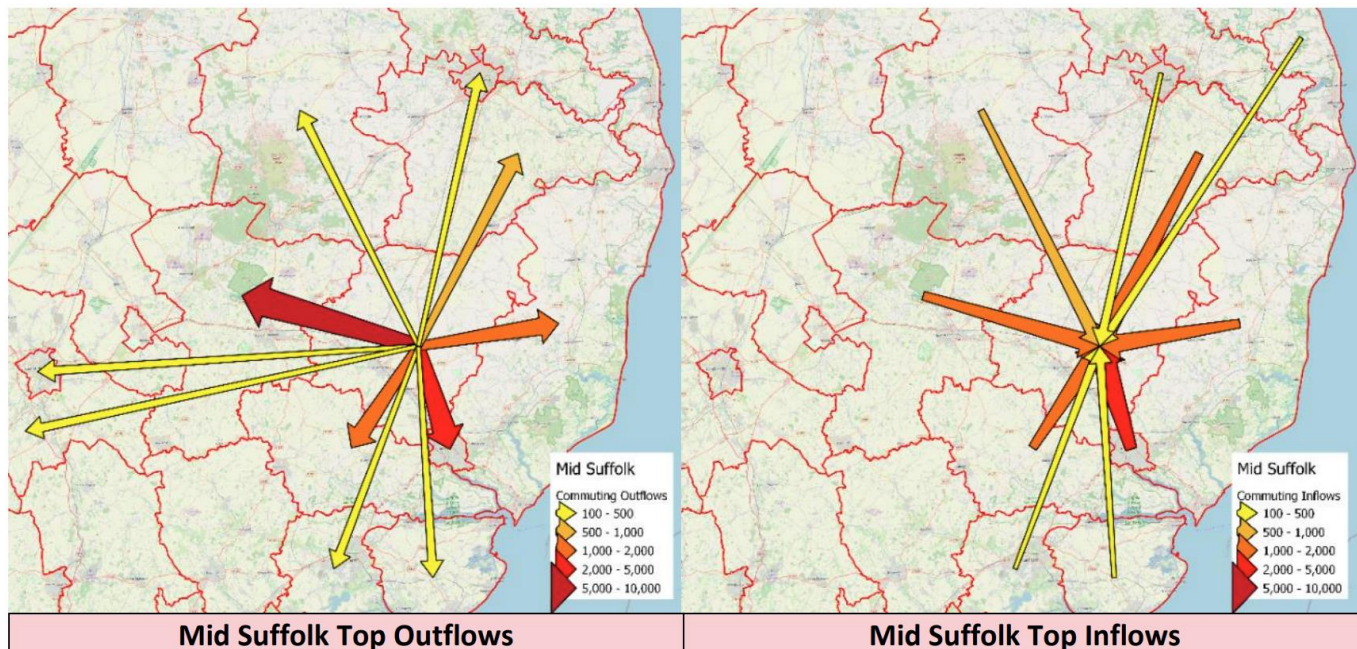


Table 5.2 Mid Suffolk commuting flows

| Mid Suffolk top outflows |       | Mid Suffolk top inflows |       |
|--------------------------|-------|-------------------------|-------|
| West Suffolk             | 5,298 | Ipswich                 | 3,215 |
| Ipswich                  | 3,294 | South Norfolk           | 1,603 |
| East Suffolk             | 1,944 | West Suffolk            | 1,462 |
| Babergh                  | 1,247 | East Suffolk            | 1,392 |
| South Norfolk            | 1,000 | Babergh                 | 1,091 |
| Breckland                | 361   | Breckland               | 580   |
| Colchester               | 320   | Great Yarmouth          | 304   |
| Cambridge                | 154   | Colchester              | 238   |
| South Cambridgeshire     | 144   | Norwich                 | 178   |
| Norwich                  | 114   | Tendring                | 133   |
| Outside the UK           | 108   |                         |       |
| Tendring                 | 106   |                         |       |

<sup>161</sup> Ibid



## Air quality and noise

### Air quality

**5.52** Industrial activity in the Districts has very few large industrial processes and is therefore light in nature meaning it has relatively little impact on air quality. As of 2022, there were no new sources of significant industrial emissions in the Districts and a number of small planning applications were assessed for air quality purposes, with no significant emissions predicted.

**5.53** The most significant source of air pollution is from transport. Air quality is tested annually throughout the Districts. The main pollutant of concern is Nitrogen Dioxide (NO<sub>2</sub>) which comes from road traffic emissions and monitoring has been conducted to measure concentrations.

**5.54** In Babergh District, results found that Cross Street, Sudbury had concentrations of NO<sub>2</sub> that are higher than the health based annual mean Air Quality Objective for NO<sub>2</sub> of 40µg/m<sup>3</sup>. As a result, an Air Quality Management Area (AQMA) was designated in 2008 in this area. During 2022, there were no exceedances of the Air Quality Objective in Babergh or Mid Suffolk Districts. Results relating to this objective for 2018 and 2019 were similar to each other. Following this, a significant reduction in NO<sub>2</sub> levels were reported in 2020, with slight increases reported from 2020 to 2021 and 2022. The concentrations of NO<sub>2</sub> reported in 2022 were similar to the figures reported in 2020 and 2021 both within and outside the AQMA. The figures reported are lower than those in 2018 and 2019. It is thought that this trend to lower levels of pollutants up to 2022 is because of reduced traffic flows compared to 2018 and 2019, improved engine technology causing reduced emissions, an increase in electric vehicles, and the removal of on-street parking bays within the AQMA. The main roads within the Districts (A12, A14 and A140) and the railway between London and Norwich have not been found to have significant poor air quality. No significant changes have been made to transport routes within either District during 2022<sup>162</sup>.

**5.55** Due to the high levels of NO<sub>2</sub> in Cross Street, an Air Quality Action Plan has been produced which will help reduce the concentration of NO<sub>2</sub>. There are two parking bays along the street which allow vehicles to park and when either bay is occupied cars have to slow down to allow cars to pass on the other side and often a queue builds up. Queuing and accelerating lead to an increase in concentrations of NO<sub>2</sub>. Babergh District has been working with Suffolk County Council Highways Department to pursue experimental removal of on-

street parking bays. In January 2020, two sets of on-street parking bays were removed from Cross Street, under an Experimental Traffic Regulation Order (TRO). NO<sub>2</sub> concentrations fell on Cross Street during 2020, although this may have also been influenced by the COVID-19 pandemic. The TRO was made permanent due to benefits to air quality<sup>163</sup>. In Mid Suffolk, monitoring has not historically shown exceedances of the Air Quality Objective at exposure locations, (e.g. schools, hospitals, care homes and residential properties) and there are no designated AQMAs.

**5.56** AQMAs are also present in neighbouring authorities:

- West Suffolk Council:
  - Great Barton AQMA – The designated area incorporates Gatehouse Cottage and 1 to 8 The Street (A143), in the Parish of Great Barton, Suffolk.
  - Sicklesmere Road, Bury St Edmunds AQMA: The designated area incorporates 2 and 7 Sicklesmere Road and 28 Southgate House, Rougham Road, in the Parish of Bury St Edmunds (Southgate Ward)
- Colchester Borough Council:
  - Area 1 - Central Corridors - High St Colchester, Head St, North Hill, Queen St, St Botolphs St, St Botolphs Circus, Osbourne St, Magdalen St, Military Rd, Mersey Rd, Brook St, East St and St Johns Street.
  - Area 2 - East Street and the adjoining lower end of Ipswich Road – East Street and Ipswich Road.
  - Area 4 - Lucy Lane North, Stanway – Lucy Lane North, Stansway.
- East Suffolk Council:
  - The Suffolk Coastal District Council Air Quality Management Area No 3 – The designated area incorporates the four properties situated within 1-5 Long Row, Main Road, in Stratford St Andrew, Suffolk.
- Ipswich Borough Council:
  - Ipswich AQMA No.1 – An area encompassing the land in and around the junction of Norwich Road, Chevallier Street and Valley Road, extending along Chevallier Street to beyond the junction with Waterloo Road.
  - Ipswich AQMA No.2 – An area from the junction with Peel Street, extending along Crown Street, St

<sup>162</sup> BMSDC (2023). 2023 Air Quality Annual Status Report (ASR). (see [https://www.babergh.gov.uk/documents/d/asset-library-54706/2023-](https://www.babergh.gov.uk/documents/d/asset-library-54706/2023-air-quality-annual-status-report-for-babergh-district-council-and-mid-suffolk-district-council-pdf)

[air-quality-annual-status-report-for-babergh-district-council-and-mid-suffolk-district-council-pdf](https://www.babergh.gov.uk/documents/d/asset-library-54706/2023-air-quality-annual-status-report-for-babergh-district-council-and-mid-suffolk-district-council-pdf))

<sup>163</sup> Ibid

Margarets Street and St Helens Street to the junction with Palmerston Road, and from St Margarets Street extending up Woodbridge Road to just beyond the junction with Argyle Street.

- Ipswich AQMA No.3 – An area following the route of the Star Lane / Key Street / College Street gyratory clockwise from the junction with Lower Orwell Street, extending along Star Lane, Grimwade Street, Fore Street, Salthouse Street, Key Street and College Street, terminating at the junction with Bridge Street.
- Ipswich AQMA No.5 – An area incorporating the land in or around St. Matthews Street / Norwich Road between the Civic Drive roundabout and Bramford Road.

**5.57** It is recognised that air quality does not respect administrative or political boundaries and that there is potential for the occurrence of cross boundary impacts on neighbouring AQMAs. Development in BMSDC is likely to impact the AQMAs present in neighbouring authorities as a result of traffic growth, particularly the ones located within close proximity to BMSDC, such as Bury St Edmunds and Great Barton in West Suffolk, and the four AQMAs present within Ipswich – all of which have been designated as a result of NO<sub>2</sub> levels. Development in BMSDC is especially likely to impact the Ipswich AQMAs because a large number of people commute to/from Ipswich from Babergh and Mid Suffolk Districts.

**5.58** **Figure 5.4 to 5.6** show air quality in the two Districts and surrounding areas, and where AQMAs have been designated for NO<sub>2</sub> pollution. These clearly show that air pollution follows the main road transport corridors, with concentrations in the urban areas, even though pollution thresholds are not exceeded in most locations.

### Noise

**5.59** Noise is a common problem arising from transport, and studies have shown it can have major negative direct and indirect effects on health and well-being, on quality of life and on wildlife. Exposure to noise can increase stress levels, disrupt communications and disturb sleep. There is scope for transport's noise emissions to be reduced, by cutting the number of cars on the road, low-noise road surfacing, noise barriers, and many other measures.

**5.60** Noise pollution is not a major issue in Babergh and Mid Suffolk, and again tends to be associated with the main transport corridors as shown in **Figure 5.7**.

## Future baseline and likely evolution without the Part 2 Joint Local Plan

**5.61** Without the Part 2 JLP, car dependency will continue to be high and sites may be in inaccessible locations with no easy access to public transport. The Districts' residents rely heavily on cars to get around and access employment, education, amenities and services, partly as a result of living in more isolated rural areas. There are many different commuting routes within the Districts, although public transport is limited. Without the Part 2 JLP, development is more likely to come forward at less connected locations and locations where there is limited potential to support improvements for sustainable transport. This type of approach is likely to entrench the existing propensity towards using cars for journeys in the Districts.

**5.62** The most significant source of air pollution in the Districts is from transport. The main pollutant of concern is Nitrogen Dioxide (NO<sub>2</sub>) which comes from road traffic emissions, and monitoring has been conducted to measure concentrations. Babergh District has an AQMA focused on Cross Street, Sudbury, which has been designated because the area exceeds the health based annual mean Air Quality Objective for NO<sub>2</sub> of 40µg/m<sup>3</sup>. In relation to this AQMA, an Air Quality Action Plan has been produced which will help reduce the concentration of NO<sub>2</sub>. In Mid Suffolk there are no designated AQMAs. However, there are a number of AQMAs present in the neighbouring authorities.

**5.63** How air quality will change in the absence of the Part 2 JLP is partly unknown, given both Districts are predominantly rural and many residents are therefore dependent on the private car. The absence of the Part 2 JLP could mean that development may not be directed to the most sustainable locations, which would not reduce dependency on travel by car and limit the potential for improvements in air quality within the AQMA and at other locations in the District. There is also potential for new development to have impacts on air quality within AQMAs in neighbouring authorities. Further to this, the Government's commitment to ban the sale of all new petrol and diesel cars by 2035 and the subsequent increase in electric vehicles, could help reduce air pollution.

## Key sustainability issues

**5.64** The key sustainability issues for transport, air quality and noise, and the opportunities for the Joint Local Plan Part 2 to address them are shown in **Table 5.3**.



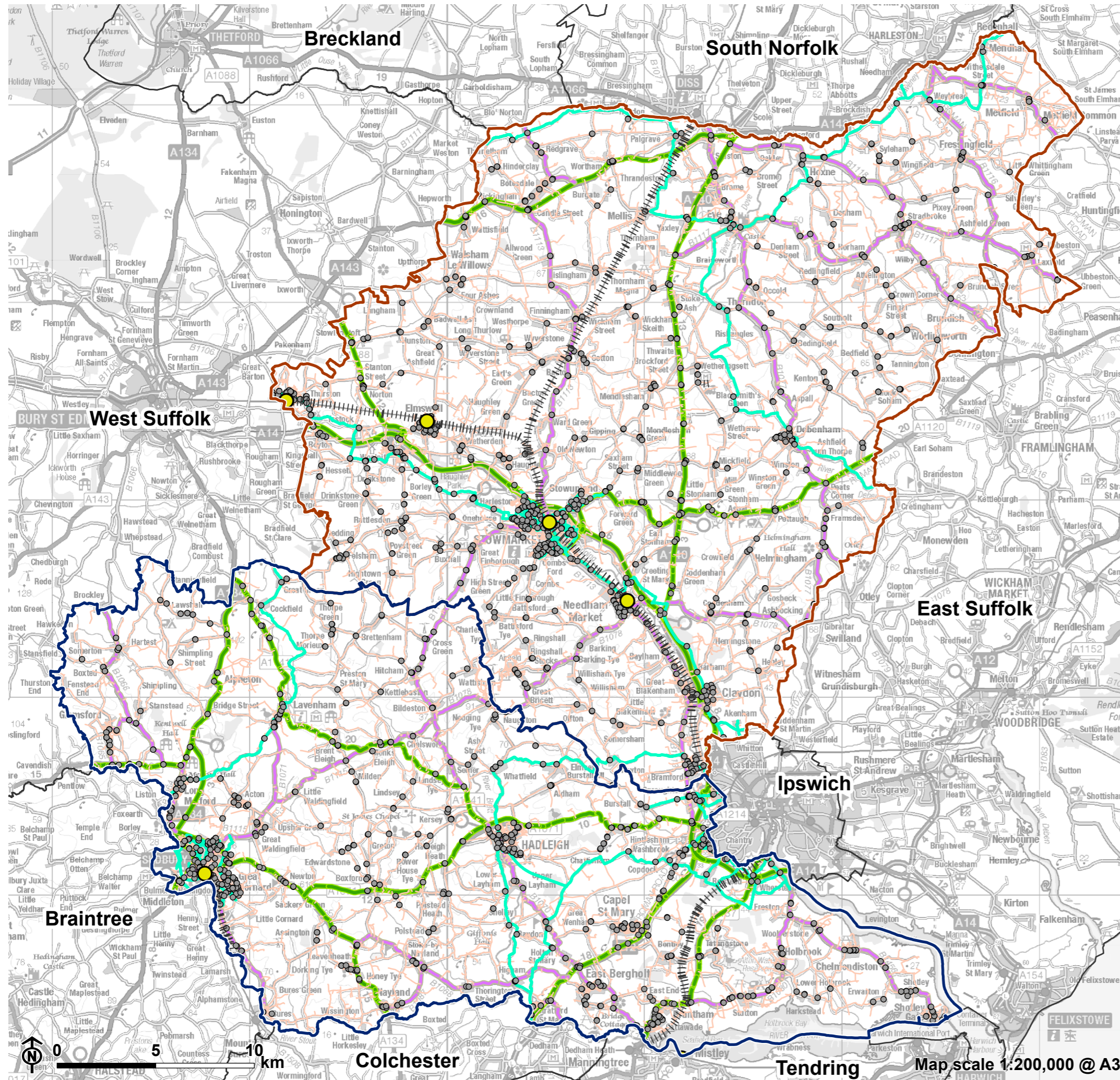
**Table 5.3: Key sustainability issues and opportunities for the Joint Local Plan Part 2 to address them**

| Key sustainability issues for Babergh and Mid Suffolk  | Opportunities for the Joint Local Plan Part 2 to address the key sustainability issues   | Relevant SA objectives          |
|--|--|---------------------------------|
| <p>Both Babergh and Mid Suffolk benefit from some form of public transport provision. However, due to the Districts being predominantly rural, a lot of residents are dependent on the private car.</p>  | <p>The JLP Part 2 presents an opportunity to address the issue of car dependency by promoting sustainable development locations, prioritising areas that are well-connected by transport infrastructure, and integrating new and more sustainable technologies as part of new development in BMSDC.</p>  | <p>SA objectives 6 and 16.</p>  |
| <p>Capacity issues have been identified at various junctions within BMSDC and although highway schemes to help mitigate congestion are set for implementation, capacity issues in other places will endure.</p>  | <p>Without the JLP Part 2, there is still potential for congestion to continue to be an issue in BMSDC, particularly given that the growing population is likely to exacerbate this issue. The Part 2 JLP presents the opportunity to address this by focusing on strategic site allocations, specifically identifying areas prone to congestion and prioritising infrastructure improvements through site allocations. It also has the potential to direct new development to the most sustainable locations so as to minimise the need to travel by private vehicle on the local network. This approach can be used to complement measures taken by the Highways Authority to combat congestion on the strategic road network.</p> | <p>SA objectives 6 and 16.</p>  |
| <p>BMSDC have one AQMA, which covers part of Cross Street in Sudbury, and there are five AQMAs designated in neighbouring Ipswich Borough. Additional development within BMSDC has potential to exacerbate air quality issues at these AQMAs. Similarly, there is potential for a cumulative impact of development in neighbouring authorities alongside development in BMSDC in terms of air quality.</p> | <p>Recent national policies, which include the phasing out the sale of new diesel and petrol heavy goods vehicles by 2035 and targets to cut emissions, as well as and the emergence of new technologies, such as electric vehicles, and hydrogen fuel cells, are likely to improve air quality, for example, through cleaner fuels/energy sources. Nonetheless, the JLP Part 2 provides an opportunity to contribute to improve air quality in BMSDC through the sustainable siting of development, in line with national policy aspirations.</p>   | <p>SA objectives 13 and 16.</p> |





Figure 5.4: Transport network

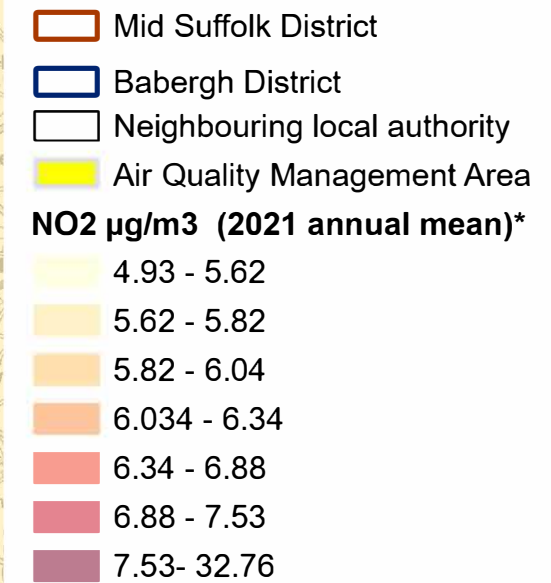
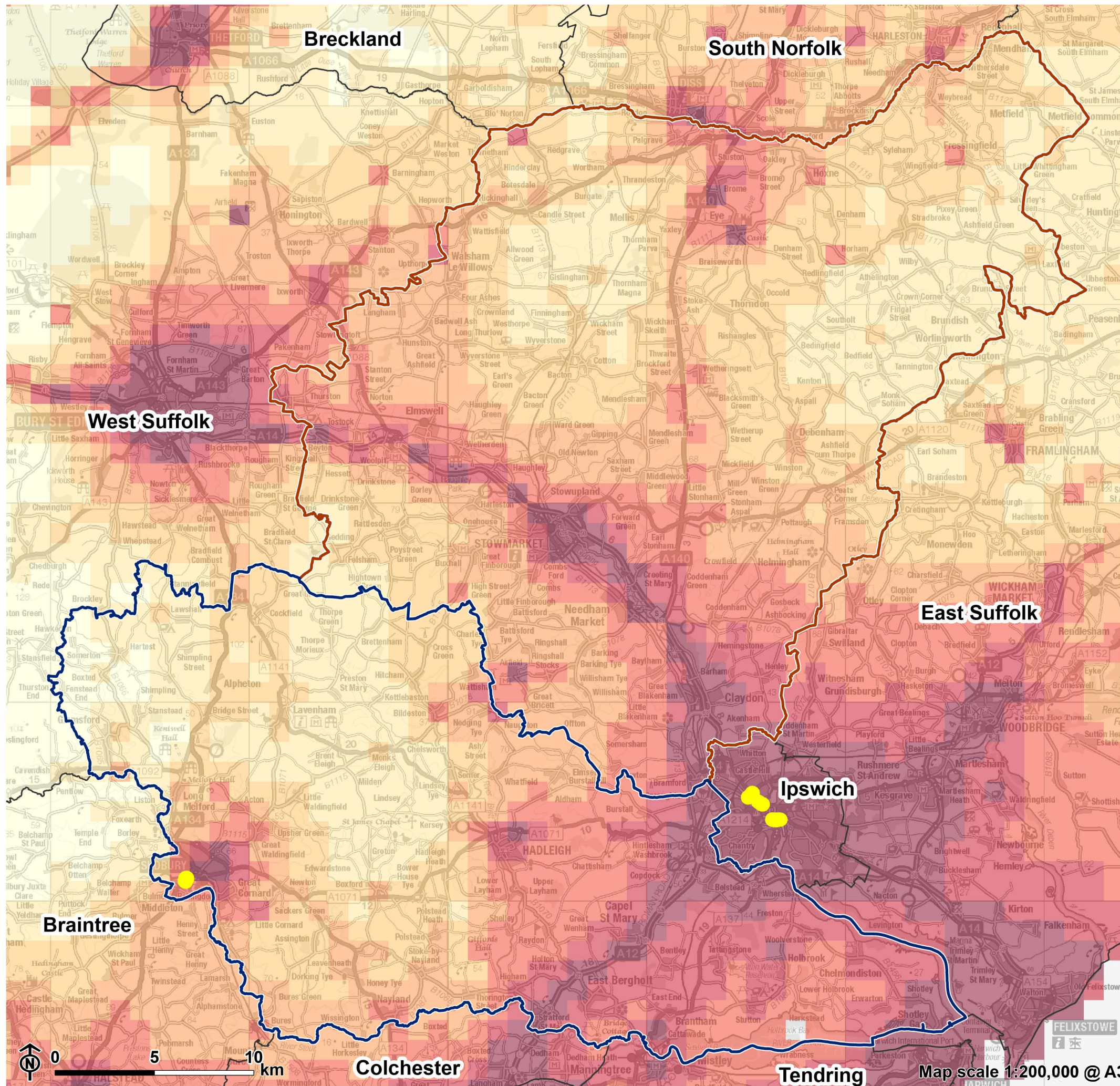


- Mid Suffolk District
- Babergh District
- Neighbouring local authority
- Bus stop
- Railway station
- Railway
- A Road
- B Road
- Other road
- Local and national cycle routes





Figure 5.5: Air quality - NO2



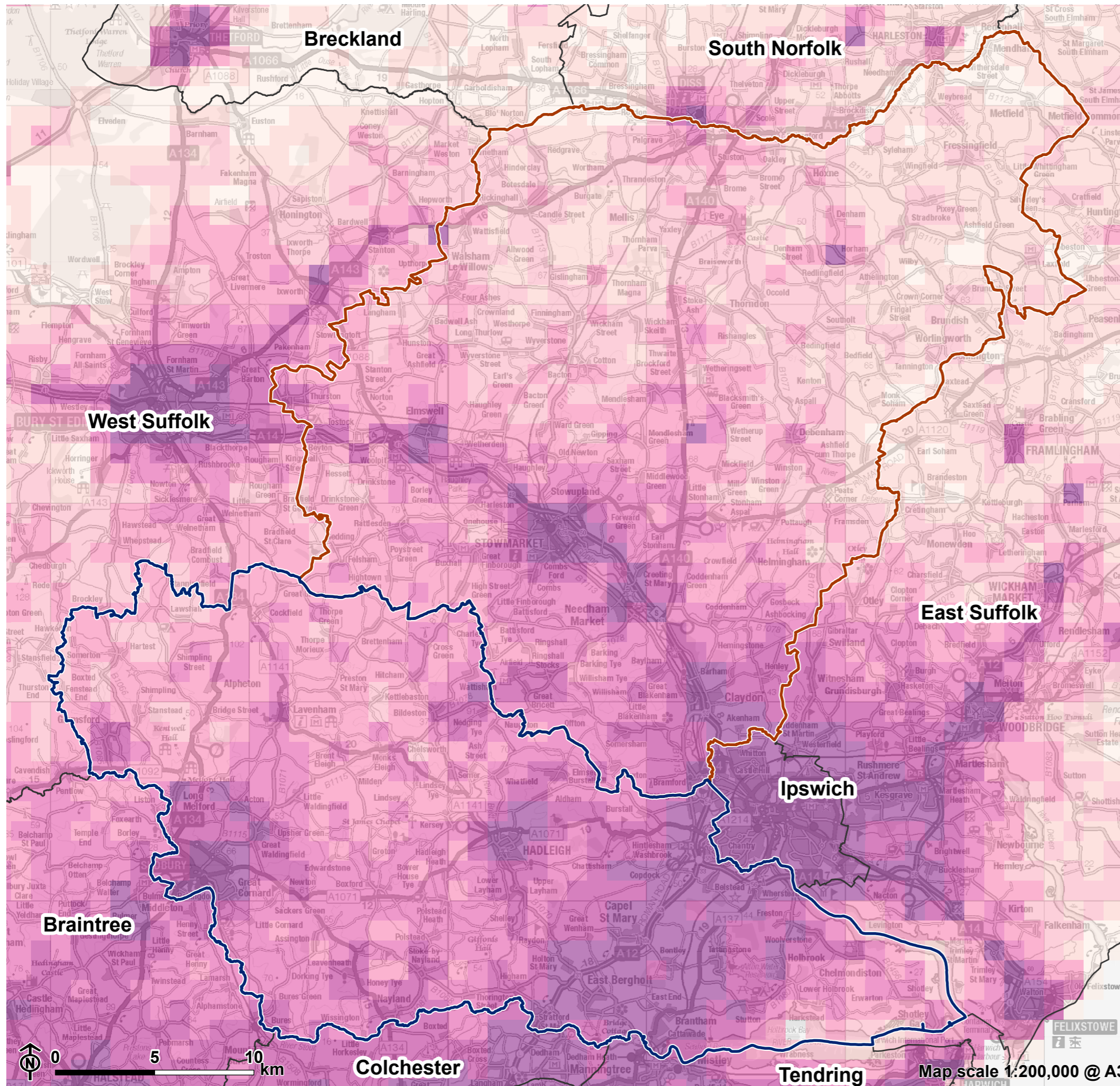
\* Notes:  
 European Directive annual mean not to exceed 40  $\mu\text{g}/\text{m}^3$ . Estimated 2021 background air pollution maps (base year 2020). Total annual mean concentrations based on 1km x 1km grid squares are provided.

NO2 concentration is displayed using quantile classification. Each class contains an equal number of features.





Figure 5.6: Air quality - PM 2.5



Mid Suffolk District

Babergh District

Neighbouring local authority

PM 2.5  $\mu\text{g}/\text{m}^3$  (2021 annual mean)\*

- 5.39 - 5.92
- 5.92 - 6.03
- 6.038 - 6.13
- 6.13 - 6.25
- 6.25 - 6.38
- 6.38 - 6.57
- 6.57 - 10.29

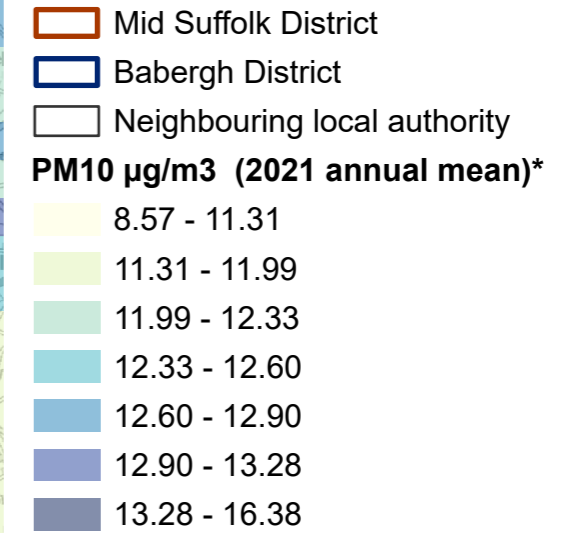
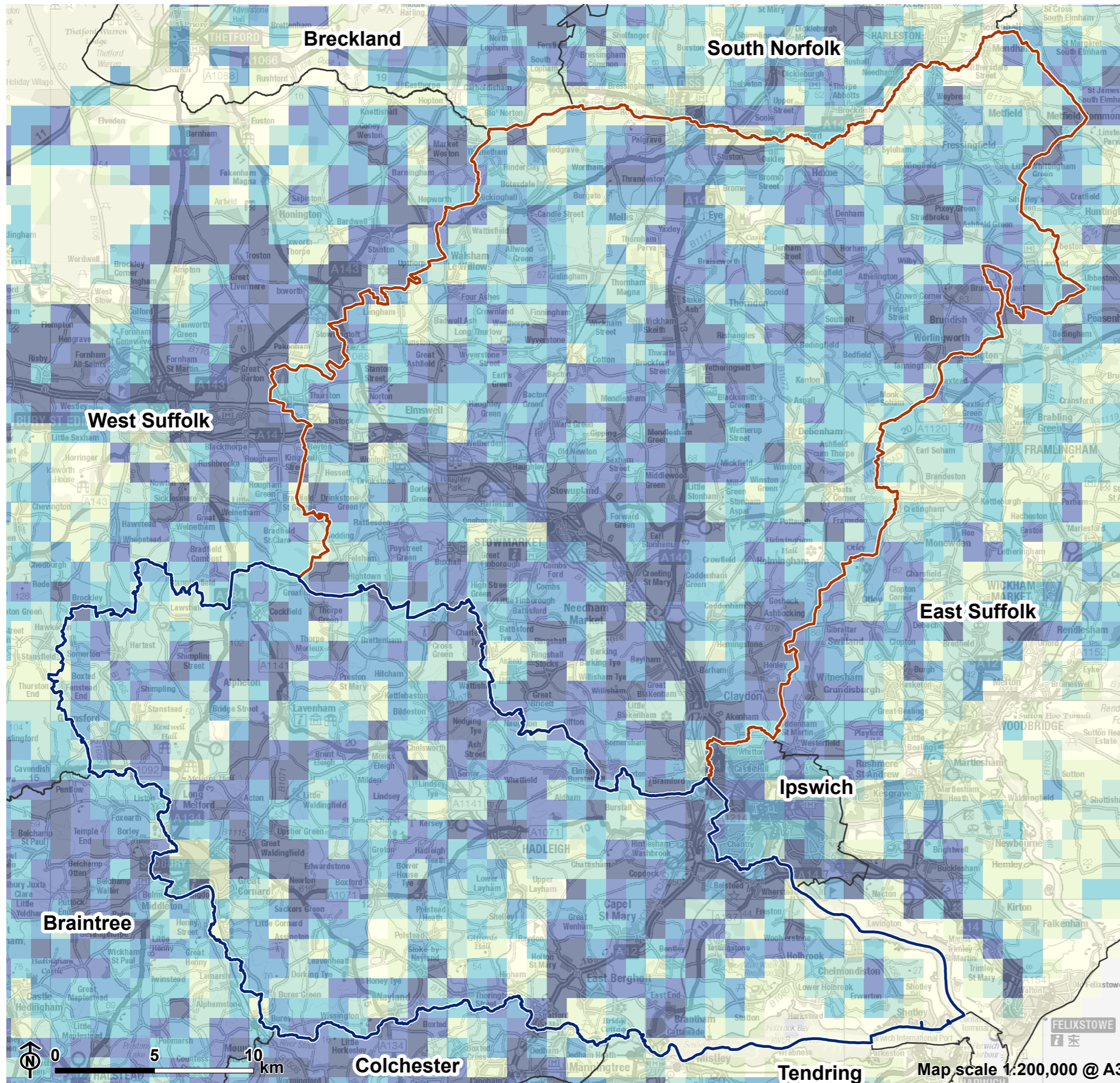
\* Notes:  
 PM 2.5 concentrations in gravimetric units. European Directive annual mean not to exceed 25  $\mu\text{g}/\text{m}^3$ .  
 Estimated 2021 background air pollution maps (base year 2020). Total annual mean concentrations based on 1km x 1km grid squares are provided.

PM 2.5 concentration is displayed using quantile classification. Each class contains an equal number of features.





Figure 5.7: Air quality - PM 10



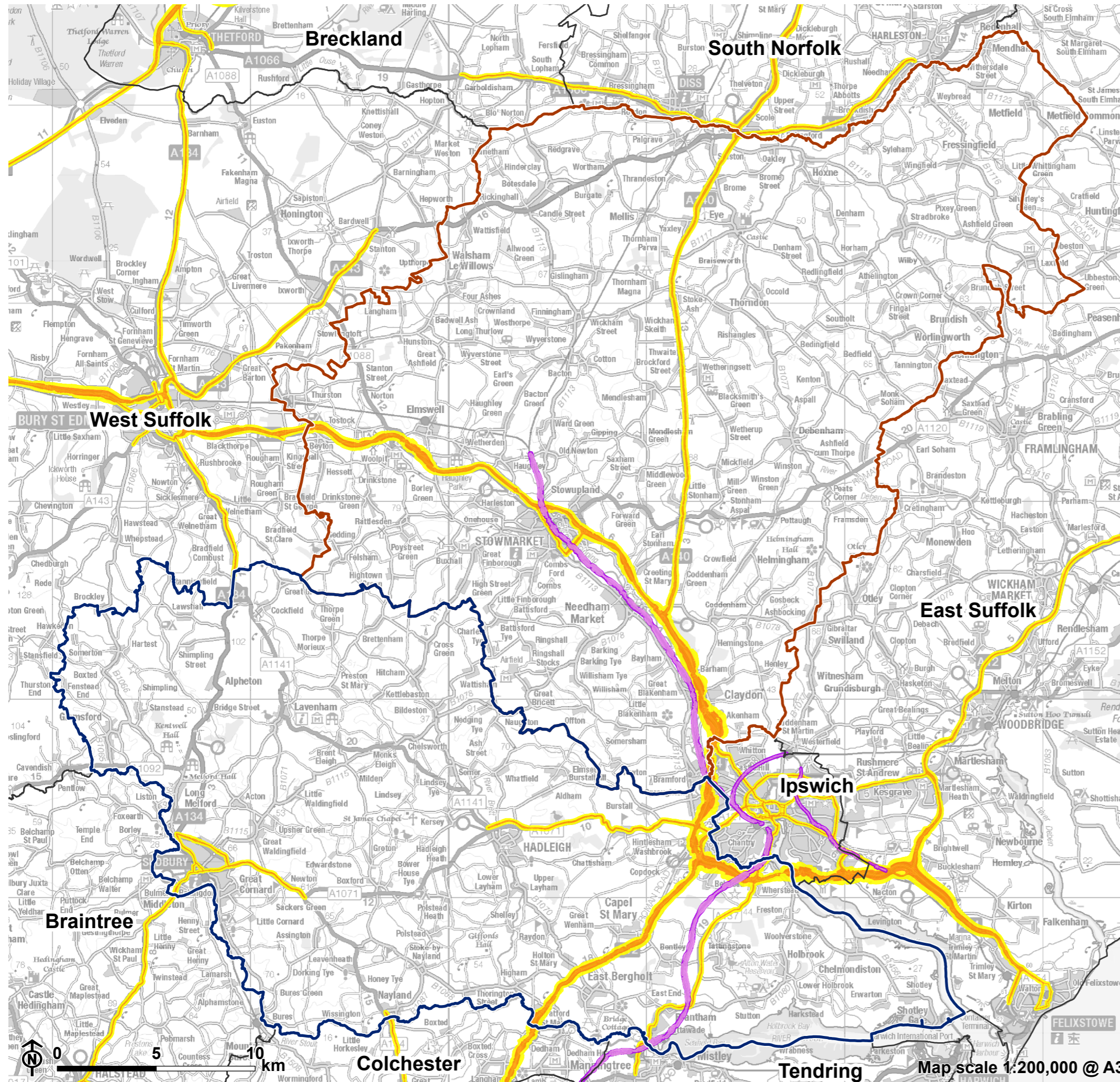
\* Notes:  
 PM 10 concentrations in gravimetric units. European Directive annual mean not to exceed  $40 \mu\text{g}/\text{m}^3$ .  
 Estimated 2021 background air pollution maps (base year 2020). Total annual mean concentrations based on  $1\text{km} \times 1\text{km}$  grid squares are provided.

PM 10 concentration is displayed using quantile classification. Each class contains an equal number of features.





Figure 5.8: Noise pollution



Mid Suffolk District

Babergh District

Neighbouring local authority

**Road noise**

A-weighted equivalent continuous sound level daytime - 16 hour (0700-2300) exceeding 59.9 dB

A-weighted equivalent continuous sound level at night (2300-0700) exceeding 54.9 dB

**Rail noise**

A-weighted equivalent continuous sound level daytime - 16 hour (0700-2300) exceeding 59.9 dB

A-weighted equivalent continuous sound level at night (2300-0700) exceeding 54.9 dB



# Chapter 6

## Land and water resources

### Policy context

#### National

**6.1** The **NPPF (2023)**<sup>164</sup> states that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued soil and the economic and other benefits of the best and most versatile agricultural land. Policies should also prevent new and existing development from “*contributing to, being put at unacceptable risk from, or being adversely affected, by unacceptable levels of soil, air, water or noise pollution.*”

**6.2** The document also requires that strategic policies should seek to make the most effective use of land in meeting local requirements making as much use as possible of previously developed or ‘brownfield’ land. Furthermore, policies should “*support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land*”.

**6.3** The NPPF is supported by planning practice guidance relating to:

- **Effective use of land (2019)**<sup>165</sup> provides guidance on making effective use of land, including planning for higher density development.
- **Green Belt (2019)**<sup>166</sup> provides advice on the role of the Green Belt in the planning system, removal of land from the Green Belt and compensatory improvements.
- **Land affected by contamination (2019)**<sup>167</sup> outlines guiding principles on how planning can deal with land affected by contamination.
- **Land stability (2019)**<sup>168</sup> sets out advice on how to ensure that development is suitable to its ground condition and how to avoid risks caused by unstable land or subsidence.
- **Natural environment (2019)**<sup>169</sup> highlights key issues in implementing policy to protect and enhance the natural

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<sup>164</sup> Ministry of Housing, Communities and Local Government (2023). National Planning Policy Framework. (see [https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF\\_December\\_2023.pdf](https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf))

<sup>165</sup> Ministry of Housing, Communities and Local Government (2019). Effective use of land. (see <https://www.gov.uk/guidance/effective-use-of-land>)

<sup>166</sup> Ministry of Housing, Communities and Local Government (2019). Green Belt. (see <https://www.gov.uk/guidance/green-belt>)

<sup>167</sup> Ministry of Housing, Communities and Local Government (2019). Land affected by contamination. (see <https://www.gov.uk/guidance/land-affected-by-contamination>)

<sup>168</sup> Ministry of Housing, Communities and Local Government (2019). Land stability. (see <https://www.gov.uk/guidance/land-stability>)

<sup>169</sup> Ministry of Housing, Communities and Local Government (2019). Natural Environment. (see <https://www.gov.uk/guidance/natural-environment>)

environment, agricultural land, soils and brownfield land of environmental value, green infrastructure, biodiversity, geodiversity, ecosystems and landscapes.

- **Water supply, wastewater and water quality (2019)**<sup>170</sup> advises on how planning can ensure water quality and the delivery of adequate water and wastewater infrastructure.
- **Brownfield land registers (2017)**<sup>171</sup> provides guidance on the purpose, preparation, publication and reviewing of brownfield land registers.
- **Minerals (2014)**<sup>172</sup> outlines guidance for planning for mineral extraction in the plan-making and application process.

**6.4 National Planning Practice Guidance**<sup>173</sup>: Requires local planning authorities to demonstrate every effort has been made to prioritise the use of poorer quality agricultural land for development where it has been demonstrated that significant development is required on agricultural land. It also requires that plan making considers, among other issues: identifying suitable sites for new or enhanced water infrastructure; assessing whether new development is appropriate near to sites used for water infrastructure; and the phasing of new development so that such infrastructure will be in place when and where needed. The impact of water infrastructure on sites designated for biodiversity should also be considered.

**6.5 Waste Management Plan for England**<sup>174</sup>: Provides an analysis on the current waste management situation in England and evaluates how it will support implementation of the objectives and provisions of the revised Water Framework Directive.

**6.6 The waste prevention programme for England: Maximising Resources, Minimising Waste (2023)**<sup>175</sup>: Sets out government's priorities for managing resources and waste, in line with the resources and waste strategy for England. The programme aims to move to a circular economy by keeping goods in circulation for as long as possible and at their highest

value. This includes increasing the reuse, repair and remanufacture of goods.

**6.7 Our Waste, Our Resources: A strategy for England (2018)**<sup>176</sup>: Sets out how the Government will preserve material resources by minimising waste, promoting resource efficiency and moving towards a circular economy in England. The Strategy aims to increase resource productivity and eliminate avoidable waste by 2050. It sets out key targets which include: a 50% recycling rate for household waste by 2020, a 75% recycling rate for packaging by 2030, 65% recycling rate for municipal solid waste by 2035 and municipal waste to landfill 10% or less by 2035.

**6.8 National Planning Policy for Waste (NPPW)**<sup>177</sup>: Identifies key planning objectives, requiring planning authorities to:

- Help deliver sustainable development through driving waste management up the waste hierarchy.
- Ensure waste management is considered alongside other spatial planning concerns.
- Provide a framework in which communities take more responsibility for their own waste.
- Help secure the recovery or disposal of waste without endangering human health and without harming the environment.
- Ensure the design and layout of new development supports sustainable waste management.

**6.9 Environmental Improvement Plan 2023**<sup>178</sup>: The Environmental Improvement Plan 2023 for England is the first revision of the 25 Year Environment Plan. It builds on the vision of 25 Year Environment Plan with a new plan setting out how Defra will work with landowners, communities and businesses to deliver each of its goals for improving the environment, matched with interim targets to measure progress. Under the plan the Government will protect 30% of England's land and sea for nature. The document identifies

<sup>170</sup> Ministry of Housing, Communities and Local Government (2019). Water supply, wastewater and water quality. (see <https://www.gov.uk/guidance/water-supply-wastewater-and-water-quality>)

<sup>171</sup> Ministry of Housing, Communities and Local Government (2017). Brownfield land registers. (see <https://www.gov.uk/guidance/brownfield-land-registers>)

<sup>172</sup> Ministry of Housing, Communities and Local Government (2014). Minerals. (see <https://www.gov.uk/guidance/minerals>)

<sup>173</sup> Ministry of Housing, Communities & Local Government (last updated 1 October 2019). Planning Practice Guidance. (see <https://www.gov.uk/government/collections/planning-practice-guidance>)

<sup>174</sup> Department for Environment, Food and Rural Affairs (2013). Waste management plan for England. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/265810/pb14100-waste-management-plan-20131213.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf))

<sup>175</sup> Department for Environment, Food & Rural Affairs (2023) Waste prevention programme for England: Maximising Resources, Minimising Waste (see <https://www.gov.uk/government/publications/waste-prevention-programme-for-england-maximising-resources-minimising-waste>)

<sup>176</sup> HM Government (2018). Our Waste, Our Resources: A strategy for England. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/765914/resources-waste-strategy-dec-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf))

<sup>177</sup> Department for Communities and Local Government (2014). National Planning Policy for Waste. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/364759/141015\\_National\\_Planning\\_Policy\\_for\\_Waste.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf))

<sup>178</sup> HM Government (2023). Environmental Improvement Plan 2023. (see <https://www.gov.uk/government/publications/environmental-improvement-plan>)

ten goals upon which action will be focused. Of the goals included in the Environmental Improvement Plan 2023, those of relevance in terms of land and water resources are:

- Goal 3: Clean and plentiful water:
  - We will achieve clean and plentiful water by improving at least 75% of our waters to be close to their natural state as soon as is practicable.
- Goal 4: Managing exposure to chemicals and pesticides:
  - We will make sure that chemicals are safely used and managed, and that the levels of harmful chemicals entering the environment (including through agriculture) are significantly reduced.

#### **6.10 Safeguarding our Soils – A Strategy for England<sup>179</sup>:**

Sets out how England's soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention on in tackling degradation threats, including: better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a changing climate; preventing soil pollution; effective soil protection during construction and; dealing with contaminated land.

**6.11 Water White Paper<sup>180</sup>:** Sets out the Government's vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It states outlines the measures that will be taken to tackle issues such as poorly performing ecosystem, and the combined impacts of climate change and population growth on stressed water resources.

**6.12 Water for Life White Paper<sup>181</sup>:** Sets out how to build resilience in the water sector. Objectives of the White Paper are to:

- Paint a clear vision of the future and create the conditions which enable the water sector and water users to prepare for it.
- Deliver benefits across society through an ambitious agenda for improving water quality, working with local communities to make early improvements in the health of our rivers by reducing pollution and tackling unsustainable abstraction.

- Keep short- and longer-term affordability for customers at the centre of decision making in the water sector.
- Protect the interest of taxpayers in the policy decisions that we take.
- Ensure a stable framework for the water sector which remains attractive to investors.
- Stimulate cultural change in the water sector by removing barriers to competition, fostering innovation and efficiency, and encouraging new entrants to the market to help improve the range and quality of services offered to customers and cut business costs.
- Work with water companies, regulators and other stakeholders to build understanding of the impact personal choices have on the water environment, water resources and costs.
- Set out roles and responsibilities – including where Government will take a stronger role in strategic direction setting and assessing resilience to future challenges, as well as clear expectations on the regulators.

#### **6.13 Future Water: The Government's Water Strategy for England<sup>182</sup>:**

Sets out how the Government wants the water sector to look by 2030, providing an outline of steps which need to be taken to get there. These steps include improving the supply of water; agreeing on important new infrastructure such as reservoirs; proposals to time limit abstraction licences; and reducing leakage. The document also states that pollution to rivers will be tackled, whilst discharge from sewers will be reduced.

#### **6.14 The Water Supply (Water Quality) Regulations**

**(2016)<sup>183</sup>:** The Regulations focus on the quality of water for drinking, washing, cooking and food preparation, and for food production. Their purpose is to protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring it is clean. .

<sup>179</sup> Department for Environment, Food and Rural Affairs (2009). Safeguarding our Soils: A Strategy for England. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69261/pb13297-soil-strategy-090910.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69261/pb13297-soil-strategy-090910.pdf))

<sup>180</sup> Department for Environment, Food and Rural Affairs (2012). The Water White Paper. (see <https://publications.parliament.uk/pa/cm201213/cmselect/cmenvfru/374/374.pdf>)

<sup>181</sup> Department for Environment, Food and Rural Affairs (2011). Water for Life. (see

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/228861/8230.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228861/8230.pdf))

<sup>182</sup> HM Government (2008). Future Water: The Government's water strategy for England. ([https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69346/pb13562-future-water-080204.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69346/pb13562-future-water-080204.pdf))

<sup>183</sup> HM Government (2016). The Water Supply (Water Quality) Regulations. (see <https://www.legislation.gov.uk/uksi/2016/614/contents?view=plain>)



**6.15 National Policy Statement for Waste Water (2012)<sup>184</sup>:**

sets out Government policy for the provision of major waste water infrastructure. The policy set out in this NPS is, for the most part, intended to make existing policy and practice in consenting nationally significant waste water infrastructure clearer and more transparent.

**6.16 Future Water: The Government's Water Strategy for England (2008)<sup>185</sup>:**

sets out how the Government wants the water sector to look by 2030, providing an outline of steps which need to be taken to get there. These steps include improving the supply of water; agreeing on important new infrastructure such as reservoirs; proposals to time limit abstraction licences; and reducing leakage. The document also states that pollution to rivers will be tackled, while discharge from sewers will be reduced.

**6.17 The Nitrate Pollution Prevention Regulations (2015)<sup>186</sup>:**

Provides for the designation of land as nitrate vulnerable zones and imposes annual limits on the amount of nitrogen from organic manure that may be applied or spread in a holding in a nitrate vulnerable zone. The Regulations also specify the amount of nitrogen to be spread on a crop and how, where and when to spread nitrogen fertiliser, and how it should be stored. It also establishes closed periods during which the spreading of nitrogen fertiliser is prohibited.

**6.18 The Environment Act 2021<sup>187</sup>** sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. It also establishes the Office for Environmental Protection which will act as an impartial and objective body for the protection and improvement of the environment. The Act sets out legislation which covers:

- Resource efficiency, producer responsibility, and the management, enforcement and regulation of waste;
- Local air quality management frameworks and the recall of motor vehicles etc; and
- Plans and proposals for water resources, drainage and sewerage management, storm overflows, water quality and land drainage.

**6.19 Establishing the Best Available Techniques for the UK (UK BAT) (2022)<sup>188</sup>** sets out a new framework that aims to improve industrial emissions and protect the environment through the introduction of a UK BAT regime. It aims to set up a new structure of governance with a new independent body in the form of Standards Council and the Regulators Group, consisting of government officials and expert regulators from all UK nations. It aims to also establish a new UK Air Quality Governance Group to oversee the work of the Standards Council and the delivery of the requirements under this new framework. It is anticipated that the BATC for the first four industry sectors will be published in the second half of 2023.

**6.20 The Waste (Circular Economy) (Amendment)**

**Regulations (2020)<sup>189</sup>** amend a range of legislation to prevent waste generation and to monitor and assess the implementation of measures included in waste prevention programmes. They set out requirements to justify not separating waste streams close to source for re-use, recycling or other recovery operations, prohibit incineration and landfilling of waste unless such treatment process represent the best environmental outcome in accordance with the waste hierarchy. The Regulations set out when waste management plans and in waste prevention programmes are required. The Regulations focus on the circular economy as a means for businesses to maximise the value of waste and waste treatment.

**Sub-national****6.21 Suffolk Minerals & Waste Local Plan (July 2020)<sup>190</sup>.**

The Plan contains planning policies for determining planning applications for minerals and waste development. The Plan allocates 10 sites for the extraction of sand and gravel sufficient to supply 9.300 Mt over the Plan period to the end of 2036. The Plan also has policies to maintain a landbank of permitted reserves of at least 7 years based upon the average of the last 10 years' sales.

<sup>184</sup> HM Government (2012). National Policy Statement for Waste Water. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69505/pb13709-waste-water-nps.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69505/pb13709-waste-water-nps.pdf))

<sup>185</sup> HM Government (2008). Future Water: The Government's water strategy for England (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69346/pb13562-future-water-080204.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69346/pb13562-future-water-080204.pdf))

<sup>186</sup> HM Government (2015). The Nitrate Pollution Prevention Regulations. (see <https://www.legislation.gov.uk/uksi/2015/668/contents/made>)

<sup>187</sup> HM Government (2021). Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

<sup>188</sup> DEFRA (2022) Establishing the Best Available Techniques for the UK (UK BAT). (see <https://www.gov.uk/government/publications/establishing-the-best-available-techniques-for-the-uk-uk-bat/establishing-the-best-available-techniques-for-the-uk-uk-bat#current-situation>)

<sup>189</sup> HM Government (2020). The Waste (Circular Economy) Regulations. (see <https://www.legislation.gov.uk/uksi/2020/904/contents/made>)

<sup>190</sup> Suffolk County Council (2020) Suffolk Minerals & Waste Local Plan (see: <https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/suffolk-minerals-and-waste-development-scheme>)

**6.22 Anglian river basin district river basin management plan (2022)**<sup>191</sup>: Under the obligations of the European Water Framework Directive (WFD) (2000), River Basin Management Plans (RBMPs) are prepared. The RBMP for the Anglian River Basin District sets out the current state of the water environment, pressures affecting the water environment, environmental objectives for protecting and improving the waters, a programme of measures and actions needed to achieve the objectives and progress.

**6.23 Babergh District's Contaminated Land Strategy (2009)**<sup>192</sup>: Provides the strategy that the Council will use to take action to prevent harm from occurring, as well as the strategy for inspecting contaminated land in the District and how the Council will manage the information generated to ensure the polluter pays.

**6.24 Mid Suffolk District's Statutory Contaminated Land Strategy (2006)**<sup>193</sup>: The report details the contaminated land strategy including a description of the Mid Suffolk area and how particular characteristics may impact on inspection strategy. It also explains the strategy for the identification of contaminated sites and how sites are prioritised according to risk. The report details the strategy for obtaining further information on pollutant linkages and the risk assessment process. The strategy also covers written determination, liability and enforcement.

**6.25 Sudbury and Great Cornard Surface Water Management Plan (2019)**<sup>194</sup>: This is a Surface Water Management Plan (SWMP) for the towns of Sudbury and Great Cornard which adheres to the four-stage approach set out in Defra's SWMP Technical Guidance Document (March 2010).

**6.26 Water Resources Management Plan 2019 (2019)**<sup>195</sup>: Every five years, Anglian Water writes a Water Resources Management Plan, which sets out how Anglian Water will manage the water supplies in their region to meet current and future needs over a minimum of 25 years. The current Plan,

published in 2019, covers the period 2020-2045. The **Draft Water Resources Management Plan 2024 (2022)**<sup>196</sup> covers the period 2025–2050.

**6.27 Water Recycling Long-Term Plan (2018)**<sup>197</sup>: This is Anglian Water's long-term plan for managing the supply of water recycling services to meet the demands of a growing population. It is used to inform investment and identify key indicators for change and transform Anglian Water's 'business as usual' practices. The Plan promotes the efficient and effective use of available resources, seeks to improve the resilience of public water supplies, supports the delivery of Anglian Water's wider resilience strategy and enhances the environment by reducing abstraction in sensitive areas.

**6.28 South East Inshore Marine Plan (2021)**<sup>198</sup>: This document introduces a strategic approach to planning within the inshore waters between Felixstowe, in Suffolk and near Dover, in Kent. It provides an evidence-based approach to inform decision-making by marine users and regulators on where activities might take place within the inshore marine plan area. The Plan will help to enhance and protect the marine environment and achieve sustainable economic growth, whilst respecting local communities both within and adjacent to the marine plan area. Babergh and Mid Suffolk District overlaps the South East Inshore Marine Plan area. In the case of Babergh, the overlap includes the tidal extent of the Rivers Stour and Orwell.

**6.29 Anglian Water Drought Plan (2022)**<sup>199</sup>: This Drought Plan covers the Babergh region of the plan area and is an update of the previously published revised draft Drought Plan 2022. It provides an overview on how Anglian Water propose to manage water resources during a drought to protect public water supplies, whilst minimising any environmental impacts that may arise as a result of activities.

**6.30 Essex and Suffolk Water Drought Plan (2022)**<sup>200</sup>: This report covers the Suffolk supply region of the plan area. ESW's supply areas are particularly prone to drought. The

<sup>191</sup> Environment Agency (2022) Anglian river basin district river basin management plan: <https://www.gov.uk/guidance/anglian-river-basin-district-river-basin-management-plan-updated-2022>

<sup>192</sup> Babergh District Council (2009). Contaminated Land Strategy. (see <https://www.babergh.gov.uk/assets/Environment/Contaminated-Land-Strategy-.pdf>)

<sup>193</sup> Mid Suffolk District Council (2000). Statutory Contaminated Land Strategy. (see <https://www.babergh.gov.uk/assets/Environment/Contaminated-Land-Strategy-Mid-Suffolk.pdf>)

<sup>194</sup> BMT (2019). Sudbury and Great Cornard Surface Water Management Plan. (see <http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Surface-Water-Management-Plans/FINALSudburyandGreatCornardSWMPv3.pdf>)

<sup>195</sup> Anglian Water (2019). Water Resources Management Plan. (see <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf>)

<sup>196</sup> Anglian Water (2022). Draft WRMP24 Main Document. (see <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp/draft-wrmp24-main-report.pdf>)

<sup>197</sup> Anglian Water (2018). Water Recycling Long-Term Plan. (see <https://www.anglianwater.co.uk/siteassets/household/in-the-community/water-recycling-long-term-plan.pdf>)

<sup>198</sup> HM Government (2021). South East Inshore Marine Plan. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1004493/FINAL\\_South\\_East\\_Marine\\_Plan\\_1\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004493/FINAL_South_East_Marine_Plan_1_.pdf))

<sup>199</sup> Anglian Water Services (2022). Drought Plan 2022 Final Version. (see <https://www.anglianwater.co.uk/siteassets/household/about-us/aws-drought-plan-2022.pdf>).

<sup>200</sup> Essex and Suffolk Water (2022). Essex and Suffolk Water Drought Plan 2022. (<https://www.nwg.co.uk/globalassets/corporate/environment-pdfs/drought-plan/esw/esw-final-drought-plan---20may22---published-version.pdf>)

report has been prepared following the Environment Agency's 'Water Company Drought Plan Guidance' (2016) and identifies how the company intends to manage a future drought and what measures are available to support supplies when levels of service are compromised.

**6.31 A Multi-Sector Approach to Providing Long-Term Resilience for Regional Water Resources: Our Emerging Strategy (January 2018)**<sup>201</sup>: Water Resources East (WRE), formed in 2014 by Anglian Water, aims to develop a more collaborative approach to water resource management planning in the East of England. Its vision is to create a fully integrated, adaptive regional water catchment that enables communities, the environment and the economy to grow and prosper. Its objectives are as follows:

1. Secure water supplies to enable sustainable housing growth.
2. Protect and enhance the environment.
3. Work through genuine multi-sector collaboration and shared decision making.
4. Find integrated, holistic solutions that address drought and flooding.

## Current baseline

### Geology and minerals

**6.32** The geology of Suffolk compared to other parts of the UK is relatively simple. The County has an extensive spread of till (boulder clay) which is underlain by chalk.

**6.33** The principal mineral resource within Suffolk is sand and gravel. Sand and gravel deposits are distributed fairly evenly across the County, although there are particular concentrations in the river valleys, especially the Gipping valley (which runs from roughly the north-west of the county down to Ipswich and the coast).

**6.34** The Suffolk Local Aggregates Assessment (LAA) (2018)<sup>202</sup> estimates the quantity of minerals across the County and plans for a steady and adequate supply of aggregates over the coming years to help meet housing and infrastructure needs. The report covers how the demand for construction aggregates is met within Suffolk. According to the assessment, the supply of aggregates to Suffolk is made up of sand and gravel imported from surrounding counties, along with imported crushed rock, marine dredged gravel and sand,

indigenous and imported recycled construction, demolition and excavation waste.

**6.35** According to the Suffolk Minerals and Waste Local Plan<sup>203</sup>, the most recent forecast and county apportionment for sand and gravel is 1.62Mt per annum. This is based on revised national guidelines. However, the intention now is that this will be based upon the average of the last ten years' sales in accordance with the NPPF and will be calculated in the annual LAA each year. Suffolk does not have an apportionment for any other mineral.

**6.36** The total permitted and committed reserves at the end of 2017 was 111.822Mt. If the landbank of permitted reserves is divided by the average of the last ten years' sales, this would be equivalent to 10.63 years' sales. In theory if the average of sales was projected forwards, all of the presently permitted reserves of sand and gravel would run out in July 2028. To ensure a continuing supply of aggregate for the period of the plan up to 2036, a further 9.3Mt needs to be identified.

**6.37** The existing and proposed minerals sites in the two Districts are shown in **Figure 6.1**.

**6.38** BMSDC has national and local designations for their geological significance, with one County Geological Site in each of the two Districts:

- **Babergh District:** Harkstead cliff and shore – London clay cliffs with brickearth/channel deposit at the east end and contorted gravel above.
- **Mid Suffolk District:** Needham Lake Erratic – glacial erratic boulder.

**6.39** A total of 87 Sites of Special Scientific Interest (SSSI) are present within BMSDC, five of which are designated for their geological significance:

- **Hoxne Brick Pit SSSI:** This SSSI is 1.3 hectares with flint hand axes dating back 400,000 years. Hoxnian Stage deposits have also been found at the site.
- **Hascot Hill Pit SSSI:** This SSSI is 0.3 hectares and the only known site to expose beach deposits from late Pliocene and early Pleistocene Red Crag Formation.
- **Sandy Lane Pit SSSI, Barham:** This SSSI is 11.1 hectares with deposits that span from the Beestonian stage through to the Cromerian Stage and then to the severe ice age of the Anglian Stage.

<sup>201</sup> Water Resources East (January 2018). A Multi-Sector Approach to Providing Long-Term Resilience for Regional Water Resources. (see [https://wre.org.uk/wp-content/uploads/2020/01/HR-S\\_1288-WRE-Strategy-document-JAN18-1.pdf](https://wre.org.uk/wp-content/uploads/2020/01/HR-S_1288-WRE-Strategy-document-JAN18-1.pdf))

<sup>202</sup> Suffolk County Council (2018). Suffolk Local Aggregates Assessment. (see <https://www.suffolk.gov.uk/assets/planning-waste->

<and-environment/Minerals-and-Waste-Policy/Local-Aggregates-Assessment-2018-dataLatest-Version.pdf>)

<sup>203</sup> SCC (2020). Suffolk Mineral and Waste Local Plan. (see <https://www.suffolk.gov.uk/asset-library/imported/chapters-1-to-18-smwlp-adopted-july-2020.pdf>)



- **Creeting St Mary Pits SSSI:** This SSSI is 5.4 hectares with former quarries that are the 'type site' for Creeting Sands. Creeting Sands are intertidal and shallow marine deposits from early Pleistocene interglacial age.
- **Great Blakenham Pit SSSI:** This SSSI is 2.2 hectares and a key site for Pleistocene studies, with a range of early and middle Pleistocene deposits.

## Soils

**6.40** The underlying soils give rise to a mix of classified agricultural land, as shown in **Figure 6.13**. The majority of land within Babergh and Mid Suffolk is Agricultural Land Classification Grade 2 or 3. There are some small areas designated as Grade 4, urban and non-agricultural. Grade 1 and Grade 2 agricultural land represent the best and most versatile land for farming, along with Grade 3a agricultural land, but the national maps of agricultural land classification do not distinguish between Grade 3a and Grade 3b agricultural land.

## Contaminated land

**6.41** For a site to meet the definition of contaminated land, a pollutant linkage must be established. A pollutant linkage consists of three parts: a source of contamination in, on or under the ground; a pathway by which the contaminant is causing significant harm or harm (or which presents a significant possibility of such harm being caused); and a receptor of a type specified in the regulations.

**6.42** Babergh and Mid Suffolk District Councils are required to maintain a Public Register of Contaminated Land under the Environmental Protection Act 1990 however, there are currently no entries on the Register in either Districts. Over the next few years, the Councils plan to inspect the Districts for contaminated land to help prevent harm to the environment and human health. Babergh and Mid Suffolk have separate contaminated land strategies that provide further information about how the Councils plan to examine the contaminated land.

## Water

**6.43** The Districts are within the Anglian River Basin, the management plan of which aims to prevent physical modifications, negative effects of invasive non-native species, pollution from wastewater, towns, cities, rural areas and transport. Babergh is in the Combined Essex Catchment

Partnership and Mid Suffolk is in the East Suffolk Catchment Partnership. The idea behind these partnerships is to engage a wide range of stakeholders and encourage local action to protect and enhance the water environment.

**6.44** Anglian Water provides for Babergh District, whilst Essex and Suffolk Water provides for Mid Suffolk, yet both are particularly prone to drought. Therefore, both Districts are located within a water stressed area. Much of eastern England receives less than 700 mm of rainfall per year and includes some of the driest areas in the United Kingdom<sup>204</sup>. Due to water being imported from elsewhere in the country, there must be effective and reliable water systems in place to reduce any harms associated with droughts, ranging from small-scale water inefficiencies to large-scale ones, in order to ensure a sustainable supply of water. The WRMPs of Anglian Water and Essex & Suffolk Water show a supply-demand deficit if no action is taken<sup>205206</sup>. Specifically, Anglian Water anticipates that the supply-demand balance will change from a total regional surplus of 150 MI/d in 2020, to a total regional deficit of -30MI/d by 2025 and -144 MI/d by 2045, should no action be taken. One of the Water Resource Zones within Essex and Suffolk Water, Hartismere, falls within the Mid Suffolk boundary. In the Hartismere Water Resource Zone, the supply surplus is predicted to be maintained across the Plan period provided management controls are in place to maintain the surplus, e.g. through preventing non-domestic uses that require high water uses. According to the Water Cycle Study, most areas within both Districts covered by Anglian Water require infrastructure and/or treatment upgrades to serve a growing population. In the Essex and Suffolk Water area, it is likely that larger development sites and those on the periphery of the network may require some network reinforcement. The same applies with regard to wastewater treatment flow capacity and foul sewerage network capacity.

**6.45** There are Source Protection Zones (SPZs) scattered throughout the Districts, as shown in **Figure 6.14**. However, SPZ 3 covers the majority of the Districts which is the total catchment. Small areas across the Districts make up the inner and outer catchments.

**6.46** Drinking Water Safeguard Zones (Surface Water) are catchment areas that influence the water quality for their respective Drinking Water Protected Area (Surface Water), which are at risk of failing the drinking water protection objectives. These non-statutory Safeguard Zones are where action to address water contamination will be targeted, so that

<sup>204</sup> Met Office (2020). Eastern England: climate. (see <https://www.metoffice.gov.uk/research/climate/maps-and-data/regional-climates/index>)

<sup>205</sup> JBA Consulting (2020). Babergh & Mid Suffolk District Council Water Cycle Study Final Report.

<sup>206</sup> Mott MacDonald (2022). Anglian Water's Draft Water Resource Management Plan 2024 (see <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp/environment-main-report.pdf>)

extra treatment by water companies can be avoided. Safeguard Zones are a joint initiative between the Environment Agency and water companies. Safeguard Zones are one of the main tools for delivering the drinking water protection objectives of the Water Framework Directive. This data includes what substances are causing the drinking water protected area to be 'at risk'. Safeguard Zones cover the majority of land in both Districts.

**6.47** The water quality within Babergh and Mid Suffolk Districts has been assessed through their Water Cycle Study<sup>207</sup>. The majority of the water bodies have a moderate or poor ecological status, and in all of the water bodies that contain a Water Recycling Centre (WRC) serving growth, sewage discharge was cited as one of the "reasons for not achieving good status". The only water body within the catchment which has a bad ecological status is the Little Ouse (US Thelmetham) (Waterbody ID GB105033043060). The water body received bad ecological status for fish and dissolved oxygen. Also contributing to the good status not being achieved are diffuse sources of phosphate from agriculture (livestock and poor nutrient management), and in some cases from urban and transport sources. The River Basin Management Plan for the Anglian River Basin estimates that pollution from wastewater affects 50% of water bodies within this River Basin District. The Water Cycle Study found that a number of WRCs have limited headroom in their environmental permit, additional growth may require changes to their flow permit and accompanying changes to their environmental permit and/or upgrades to treatment performance.

## Waste

**6.48** Within Suffolk County, there are currently 100 active waste management facilities<sup>208</sup>, and only one active landfill site receiving non-hazardous waste<sup>209</sup>. Seventeen of these facilities are located in Babergh District and 34 are located in Mid Suffolk District. A growing population in BMSDC will place pressure on existing waste management facilities and as such, there will be a requirement to meet growing needs.

**6.49** According to both Districts' Climate Change and Biodiversity Annual Reports<sup>210</sup>, <sup>211</sup>, all kerbside waste, when it

cannot be recycled, goes to the Suffolk Energy from Waste plant which powers more than 30,000 homes. Their recycling rate (reduction in waste sent to the energy from waste plant) for 2020/21 was 39.49% and their aim is to increase this to 65%.

**6.50** Of the 75,444 tonnes of household waste produced in Mid Suffolk District in 2021/22, 30,924 tonnes were sent for reuse, recycling or composting. It was reported that 41.0% of waste in Mid Suffolk was recycled during this period. Approximately 384.6kg of waste per person was collected during this period. Figures relating to handling of household waste were not available from Defra for Babergh District<sup>212</sup>.

**6.51** Although there are significant quantities of Local Authority Collected Waste, Commercial and Industrial Waste, Construction, Demolition and Excavation Waste, and Hazardous Waste managed within Suffolk, the Suffolk Waste Study concluded that there is no immediate shortfall in waste management capacity for these waste streams.

## Future baseline and likely evolution without the Part 2 Joint Local Plan

**6.52** The majority of land within Babergh and Mid Suffolk is Agricultural Land Classification Grade 2 or 3. There are some small areas designated as Grade 4, urban and non-agricultural. Without the JLP Part 2 it is likely that development would, in some instances, take place on the best and most versatile agricultural land, compromising the higher value agricultural soils in the Districts as well as its safeguarded mineral resources.

**6.53** Both Districts are located within the Anglian River Basin, although Anglian Water provides for Babergh District, whilst Essex and Suffolk Water provides for Mid Suffolk. These are both prone to drought, and therefore both Districts are within a water stressed area. The majority of the water bodies in the Districts have a moderate or poor ecological status. There are Source Protection Zones (SPZs) scattered throughout the Districts. Without the Local Plan it is possible that development could be located in areas that will exacerbate existing water quality and stress issues and, despite existing safeguards, such as the EU Water Framework Directive,

<sup>207</sup> JBA Consulting (2020). Babergh & Mid Suffolk District Council Water Cycle Study Final Report

<sup>208</sup> Suffolk County Council (2015). Waste Policies: Monitoring Report 2014. (see <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-applications/Minerals-and-Waste-Development-Planning/Annual-Monitoring-Reports/Waste-MR-Final-March-2015.pdf>)

<sup>209</sup> Sacks Consulting (2022). Suffolk Waste Annual Monitoring Report (see <https://www.suffolk.gov.uk/asset-library/suffolk-waste-amr-final-mar-2022.pdf>)

<sup>210</sup> Babergh District Council (2021). Climate Change and Biodiversity Annual Report. (see

<https://www.babergh.gov.uk/assets/Environment/Climate-change-and-biodiversity-annual-report-Babergh.pdf>)

<sup>211</sup> Mid Suffolk District Council (2021). Climate Change and Biodiversity Annual Report. (see <https://www.babergh.gov.uk/assets/Environment/Climate-change-and-biodiversity-annual-report-Mid-Suffolk.pdf>)

<sup>212</sup> Defra (2023) Local Authority Collected Waste Statistics - Local Authority data. (see <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables#full-publication-update-history>)

which provides some protection. Development that occurs within Source Protection Zones presents a risk of contamination from any activity that might cause pollution in an area.

**6.54** In terms of waste management, there are multiple active waste management facilities in Babergh and Mid Suffolk Districts. Although there are significant quantities of various waste types in the region, there is no immediate shortfall in waste management capacity for these waste streams. Without the JLP Part 2, it is likely that capacity for wastewater

treatment will develop as Suffolk County Council is responsible for its provision. However, a growing population in BMSDC will place pressure on existing waste management facilities and as such, there will be a requirement to meet growing needs.

### Key sustainability issues

**6.55** The key sustainability issues for land and water resources, and the opportunities for the Joint Local Plan Part 2 to address them are shown in **Table 6.1**.

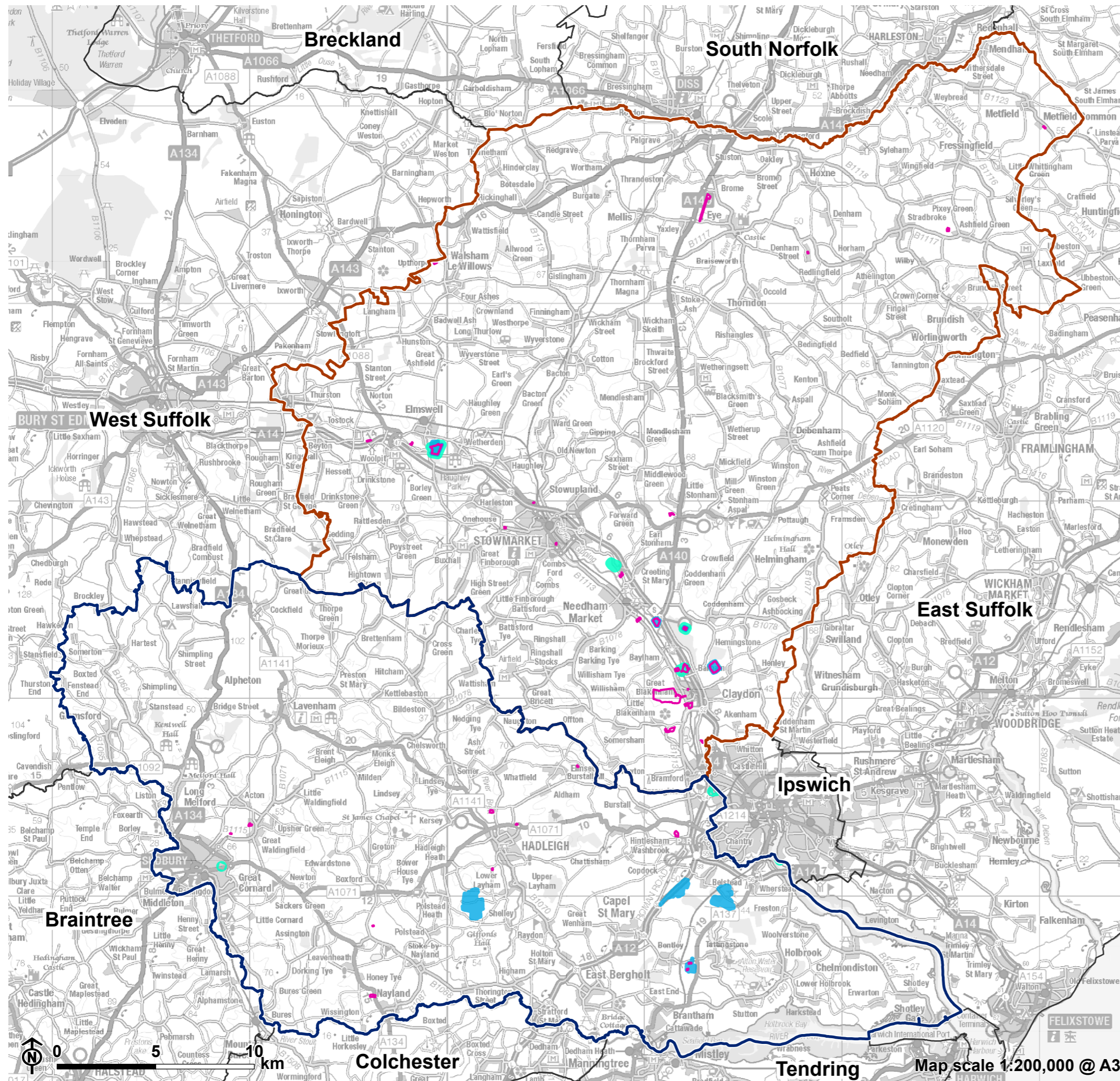
**Table 6.1: Key sustainability issues and opportunities for the Joint Local Plan Part 2 to address them**

| Key sustainability issues for Babergh and Mid Suffolk  | Opportunities for the Joint Local Plan Part 2 to address the key sustainability issues  | Relevant SA objectives  |
|--|---|-------------------------|
| BMSDC contains safeguarded mineral resources which, where possible, should not be lost or compromised by future growth.  | The JLP Part 2 provides an opportunity to promote development on brownfield land, in addition to the safeguarding of minerals resources.  | SA objective 7.         |
| The majority of BMSDC comprises best and most versatile agricultural land with a mix of classified agricultural land (Grades 1, 2, and 3). New development should, where possible, be delivered as to avoid the loss of higher grades of agricultural land.  | The JLP Part 2 provides an opportunity to strengthen the approach and ensure these natural assets are not lost or compromised. This may involve the prioritisation of use of brownfield sites and lower quality agricultural land for development, through strategic site selection.  | SA objectives 7 and 11. |
| Due to Babergh and Mid Suffolk having numerous rivers running through their areas (e.g. the River Gipping and River Brett), there is a need to ensure that not only the rivers are protected but that all water sources including groundwater are too. Most of BMSDC is covered by Source Protection Zones.  | The JLP Part 2 provides an opportunity to ensure that development is located and designed to take into account the sensitivity of the water environment, including sufficient waste water treatment capacity to accommodate growth.   | SA objective 5.         |
| Anglian Water provides for Babergh District, whilst Essex and Suffolk Water provides for Mid Suffolk – both of which are prone to drought. Due to water being imported from elsewhere in the country, there must be effective and reliable water systems in place to reduce any harm associated with droughts. The likelihood of droughts may increase as a result of climate change, and it should be noted that there is significant cross-over between water resource availability and water quality. | The JLP Part 2 has the potential to secure long term sustainable development through prioritising development sites that have access to adequate water supplies, and are not in areas at risk of drought. The JLP Part 2 will also provide up-to-date settlement boundaries which can incorporate considerations of water source availability and vulnerability to drought to ensure that new development within settlement boundaries does not exacerbate water scarcity issues. | SA objectives 5 and 9.  |
| A growing population and an increase in development will place pressure on wastewater treatment works (WwTWs). Seven WwTWs have been identified as not having available capacity to meet these needs.  | The JLP Part 2 provides an opportunity, through appropriate site allocations, to prioritise development sites that can accommodate wastewater treatment facilities. Updating the settlement boundaries also provides an opportunity to include areas where wastewater treatment infrastructure is needed, and this can be planned for future development.   | SA objective 5.         |
| A growing population will place increased pressure on waste management facilities and  | The JLP Part 2 provides an opportunity to promote waste minimisation and recycling initiatives by   | SA objective 8.         |



| Key sustainability issues for Babergh and Mid Suffolk    | Opportunities for the Joint Local Plan Part 2 to address the key sustainability issues   | Relevant SA objectives |
|--|--|------------------------|
| there will be a requirement to meet these growing needs. | selecting sites which have access to recycling facilities and waste collection services. |                        |

Figure 6.1: Minerals and waste sites













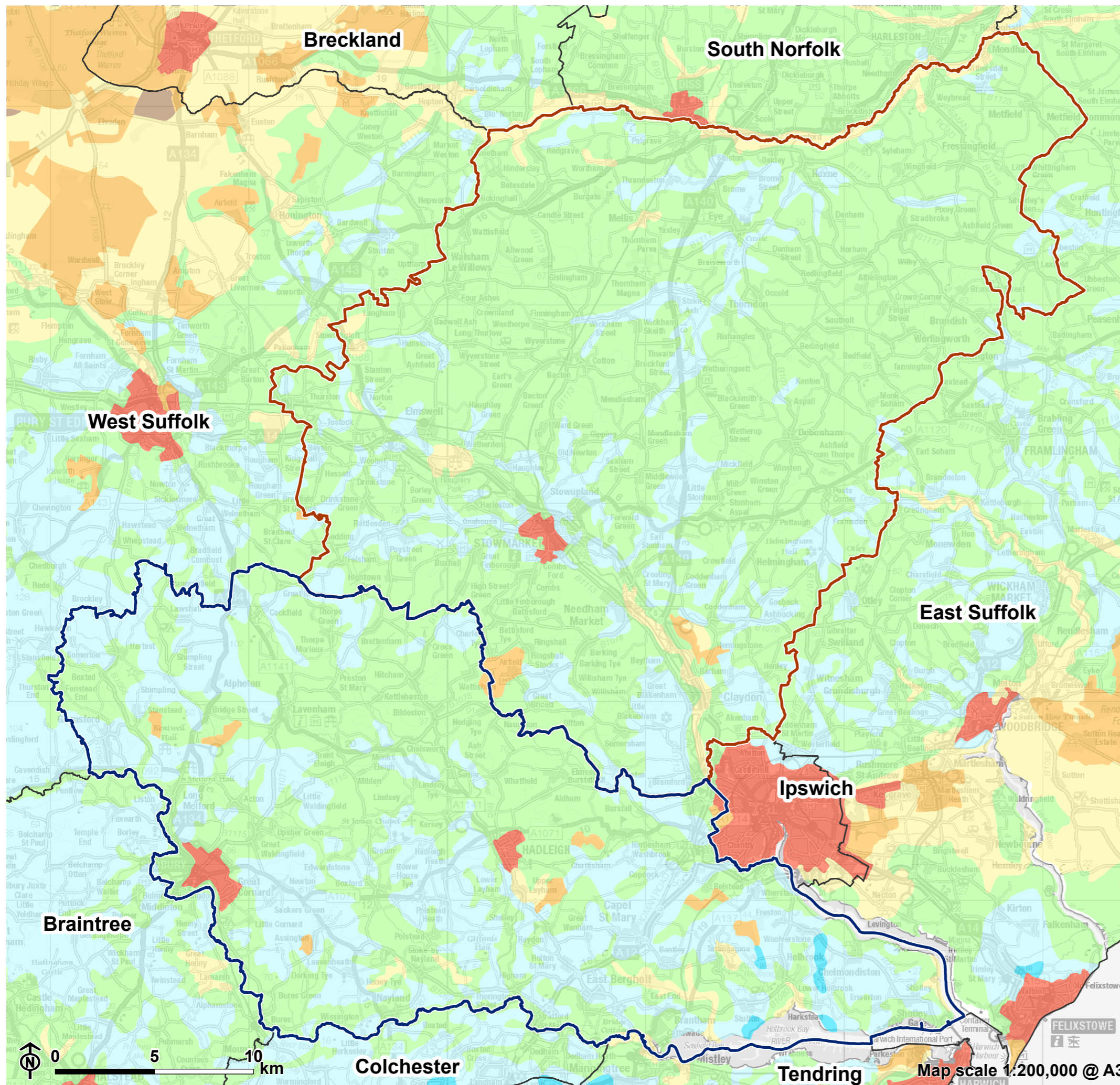
- Mid Suffolk District
- Babergh District
- Neighbouring local authority
- Mineral extraction site
- Proposed mineral site
- Waste site





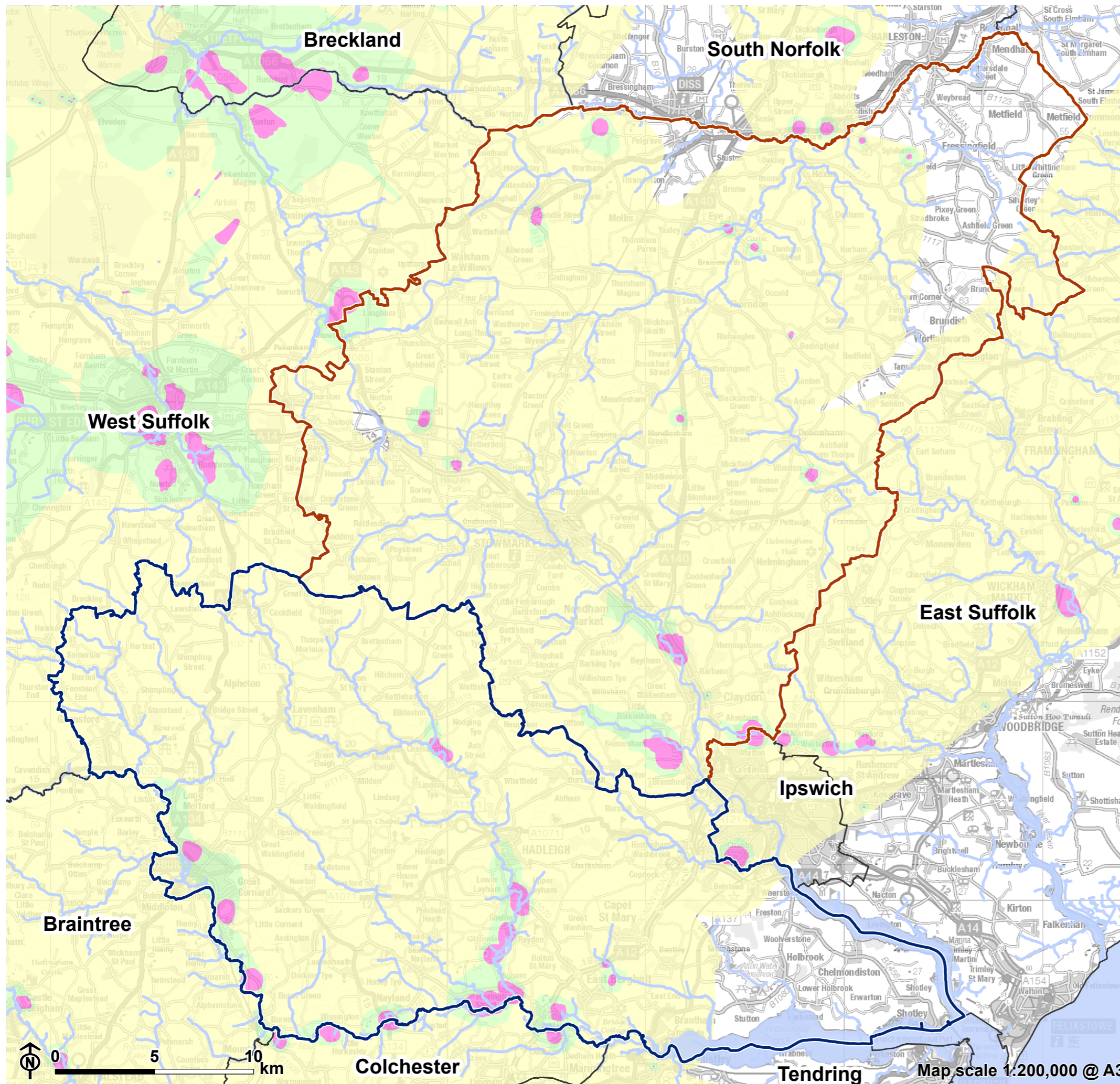
**Figure 6.2: Agricultural Land Classification**

-  Mid Suffolk District
  -  Babergh District
  -  Neighbouring local authority
- Agricultural Land Classification**
-  Grade 1
  -  Grade 2
  -  Grade 3
  -  Grade 4
  -  Grade 5
  -  Non Agricultural
  -  Urban





**Figure 6.3: Watercourses and Source Protection Zones**



- Mid Suffolk District
- Babergh District
- Neighbouring local authority
- Watercourse
- Source protection zone**
  - Zone 1
  - Zone 2
  - Zone 3



# Chapter 7

## Climate change adaption and mitigation

### Policy context

#### National

**7.1** The **NPPF (2023)**<sup>213</sup> contains as part of its environmental objective a requirement to mitigate and adapt to climate change, “*including moving to a low carbon economy*”. The document also states that the “*planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change.*” To achieve these aims new development should be planned to ensure appropriate adaptation measures are included (including green infrastructure) and should be designed, located and orientated as to help to reduce greenhouse gas emissions.

**7.2** The revised framework also requires that development be directed away from areas which are at highest existing or future risk of flooding. Where development is required in such areas, the “development should be made safe for its lifetime without increasing flood risk elsewhere.”

**7.3** In relation to coastal change in England planning policies and decisions should take account of the UK Marine Policy Statement and marine plans. Furthermore, plans should “*reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast*”.

**7.4** The NPPF is supported by planning practice guidance relating to:

- **Flood risk and coastal change (2021)**<sup>214</sup> provides guidance on how the planning process can assess, avoid, manage and mitigate the risks associated with flooding and coastal change.
- **Climate change (2019)**<sup>215</sup> advises how to identify suitable mitigation and adaptation measures in the planning process to address the impacts of climate change.

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<sup>213</sup> Ministry of Housing, Communities and Local Government (2023). National Planning Policy Framework. (see [https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF\\_December\\_2023.pdf](https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf))

<sup>214</sup> Ministry for Housing, Communities and Local Government (2021). Flood risk and coastal change. (see

<https://www.gov.uk/guidance/flood-risk-and-coastal-change>)

<sup>215</sup> Ministry of Housing, Communities and Local Government (2019). Climate change. (see <https://www.gov.uk/guidance/climate-change>)

- **Renewable and low carbon energy (2015)**<sup>216</sup> outlines guidance for developing a strategy for renewable and low carbon energy, and particular planning considerations for hydropower, solar technology, solar farms and wind turbines.

**7.5 National Planning Practice Guidance**<sup>217</sup>: Supports the content of the NPPF by promoting low carbon and renewable energy generation, including decentralised energy, the energy efficiency of existing and new buildings and sustainable transport.

**7.6 The Environment Act 2021**<sup>218</sup> sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. The Environment Act will deliver:

- Long-term targets to improve air quality biodiversity, water, and waste reduction and resource efficiency.
- A target on ambient PM2.5 concentrations.
- A target to halt the decline of nature by 2030.
- Environmental Improvement Plans, including interim targets.
- A cycle of environmental monitoring and reporting.
- Environmental Principles embedded in domestic policy making.
- Office for Environmental Protection to uphold environmental law.

**7.7 The Biomass Strategy 2023**<sup>219</sup>: Builds on the 2021 Biomass policy statement and the Powering up Britain strategy which emphasise the important role that biomass will play in Britain's fully decarbonised power system by 2035. It sets out steps the Government intends to take to strengthen biomass sustainability and the opportunities for the use of sustainable biomass across multiple sectors of the economy in support of achieving the UK's net zero target.

**7.8 Powering up Britain (2023)**<sup>220</sup>: The strategy comprises several policy documents relating to climate change, setting out the department's approach to energy security and net

zero. In particular, Powering up Britain is focused on four key areas of action:

- decarbonising electricity generation;
- improving energy efficiency;
- electrifying transport; and
- developing low-carbon heating.

**7.9 The Carbon Budget Delivery Plan (2023)**<sup>221</sup>: Sets out the approach for how the government intends to meet its legally-binding climate goals. The plan includes a package of quantified and unquantified proposals and policies, and associated timescales and delivery risks to support the achievement of these goals.

**7.10 The Energy Security Plan (2023)**<sup>222</sup> Sets out how the UK will enhance its energy security, setting out plans for future deployment of wind, new nuclear, solar and hydrogen, and for supporting the production of domestic oil and gas in the nearer term. Key commitments include:

- Looking at the role gas storage and other sources of flexibility can play in gas security.
- Delivery of energy efficiency upgrades through the Great British Insulation Scheme.
- Extension of the Boiler Upgrade Scheme to 2028.
- Setting up Great British Nuclear to lead delivery of the new nuclear programme.
- Launching a competitive process to select the best Small Modular Reactor technologies.
- Launching the Floating Offshore Wind Manufacturing Investment Scheme, to provide up to £160 million investment in port infrastructure projects.
- Publishing action plans on reducing the development time for transmission network projects and on accelerating electricity network connections.
- Announcing the Track-1 negotiation project list of carbon capture usage and storage (CCUS) projects; launching a process to expand Track-1 clusters; and establishing two further (Track-2) CCUS clusters.

<sup>216</sup> Ministry of Housing, Communities and Local Government (2015). Renewable and low carbon energy. (see

<https://www.gov.uk/guidance/renewable-and-low-carbon-energy>)

<sup>217</sup> Ministry of Housing, Communities & Local Government (last updated 1 October 2019). Planning Practice Guidance. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810197/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf))

<sup>218</sup> HM Government (2021) Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

<sup>219</sup> Department for Energy Security and Net Zero (2023) Biomass Strategy 2023 (see

<https://www.gov.uk/government/publications/biomass-strategy>)

<sup>220</sup> Department for Energy Security and Net Zero (2023) Powering up Britain (see <https://www.gov.uk/government/publications/powering-up-britain>)

<sup>221</sup> Department for Energy Security and Net Zero (2023) Carbon Budget Delivery Plan (see

<https://www.gov.uk/government/publications/carbon-budget-delivery-plan>)

<sup>222</sup> Ibid.



- Announcing a shortlist of projects for the first electrolytic hydrogen production allocation round.
- Announcing successful applicants of the first competition window for Strands 1 and 2 of the Net Zero Hydrogen Fund (development and capital co-funding) and launching a second competition window.
- Consulting on revised energy National Policy Statements which underline the national need for new energy infrastructure with the intention of expediting planning processes.

**7.11 The Net Zero Growth Plan (2023)**<sup>223</sup>: Outlines the Government's plans to reach net zero and unlock the financial benefits that this can bring.

**7.12 The British energy security strategy (2022)**<sup>224</sup>: Sets out how the UK will enhance its energy security, setting out plans for future deployment of wind, new nuclear, solar and hydrogen, and for supporting the production of domestic oil and gas in the nearer term. The strategy builds on the Prime Minister's 'Ten point plan for a green industrial revolution', and the 'Net zero strategy'. Key aims and commitments include:

- New commitments to supercharge clean energy and accelerate deployment, which could see 95% of Great Britain's electricity set to be low carbon by 2030.
- Supporting over 40,000 more jobs in clean industries, totalling 480,000 jobs by 2030.
- Accelerated expansion of nuclear, wind, solar, hydrogen, oil and gas, including delivering the equivalent to one nuclear reactor a year instead of one a decade.
- Offshore wind – aim of providing up to 50GW by 2030, of which 5GW is planned to be from floating offshore wind in deeper seas. This is aimed to be underpinned by new planning reforms to cut the approval times for new offshore wind farms from 4 years to 1 year and an overall streamlining which will aim to reduce the time it takes for new projects to reach construction stages while improving the environment.
- Oil and gas - a licensing round for new North Sea oil and gas projects is planned to launch in Autumn, with a new taskforce providing bespoke support to new developments.

- Onshore wind – The Government plan to consult on developing partnerships with a limited number of supportive communities who wish to host new onshore wind infrastructure in return for guaranteed lower energy bills.
- Heat pump manufacturing: The Government aim to run a Heat Pump Investment Accelerator Competition in 2022 worth up to £30 million to make British heat pumps, with hopes to reduce demand for gas.

### **7.13 The Net Zero Strategy: Build Back Greener (2021)**<sup>225</sup>:

Sets out policies and proposals for decarbonising all sectors of the UK economy to meet net zero targets by 2050. It sets out strategies to keep the UK on track with carbon budgets, outlines the National Determined Contribution (NDC) and sets out the vision for a decarbonised economy in 2050. Its focus includes:

- Policies and proposals for reducing emissions across the economy in key sectors (power, fuel supply and hydrogen, industry, heat and buildings, transport, natural gas and waste); and
- Policies and proposals for supporting transition across the economy through innovation, green investment, green jobs, embedding net-zero in government, local climate action, empowering people and businesses, and international leadership and collaboration.

**7.14 The UK Hydrogen Strategy (2021)**<sup>226</sup>: Sets out the Government's approach to developing a thriving low carbon hydrogen sector in the UK, with the ambition for 5GW of capacity by 2030. The Strategy outlines the role of hydrogen in meeting net zero targets, the existing opportunity within the UK, a strategic framework, a roadmap for the economy, and the UK Government's commitments for a hydrogen economy.

**7.15 The Industrial Decarbonisation Strategy (2021)**<sup>227</sup>: Aims to support existing industry to decarbonise and encourage the growth of new, low carbon industries to protect and create skilled jobs and businesses in the UK encouraging long-term investment in home-grown decarbonisation technology. The strategy builds in the Prime Minister's 10 Point Plan for a Green Industrial Revolution and sets out the government's vision for the manufacturing and construction sector and is part of the government's path to net zero by 2050.

<sup>223</sup> Ibid

<sup>224</sup> Department for Business, Energy & Industrial Strategy and Prime Minister's Office, 10 Downing Street (2022). British energy security strategy. (see <https://www.gov.uk/government/publications/british-energy-security-strategy>)

<sup>225</sup> Department for Business, Energy and Industrial Strategy (2021). Net Zero Strategy: Build Back Greener. (see <https://www.gov.uk/government/publications/net-zero-strategy>)

<sup>226</sup> Department for Business, Energy & Industrial Strategy (2022). UK Hydrogen Paper. (see <https://www.gov.uk/government/publications/uk-hydrogen-strategy>)

<sup>227</sup> Department for Business, Energy & Industrial Strategy (2021). Industrial decarbonisation strategy. (see <https://www.gov.uk/government/publications/industrial-decarbonisation-strategy>)

**7.16** The strategy aims to reduce emissions by two-thirds in just 15 years and support up to 80,000 jobs over the next thirty years and includes measures to produce 20 terawatt hours of the UK industry's energy supply from low carbon alternatives by 2030. It also aims to introduce new rules on measuring the energy and carbon performance of the UK's largest commercial and industrial buildings, providing potential savings to businesses of around £2 billion per year in energy costs in 2030 and aiming to reduce annual carbon emissions by over 2 million tonnes - approximately 10% of their current emissions.

**7.17** Other key commitments within the Strategy include:

- The use of carbon pricing to drive changes in industry to focus on emissions in business and investment decisions;
- To establish a policy framework to accelerate the switch from fossil fuels to low carbon alternatives such as hydrogen, electricity, or biomass;
- New product standards, enabling manufacturers to clearly distinguish their products from high carbon competitors;
- To ensure the land planning regime is fit for building low carbon infrastructure;
- Support the skills transition so that the UK workforce benefits from the creation of new green jobs;
- An expectation that at least 3 megatons of CO<sub>2</sub> is captured within industry per year by 2030;
- That by 2050, there will be zero avoidable waste of materials across heavy industries.

**7.18 The Heat and Buildings Strategy (2021)**<sup>228</sup>: Sets out the government's plan to significantly cut carbon emissions from the UK's 30 million homes and workplaces. This strategy aims to provide a clear direction of travel for the 2020s, set out the strategic decisions that need to be taken this decade, and demonstrate how the UK plans to meet its carbon targets and remain on track for net zero by 2050.

**7.19** Key aims of the strategy include:

- Reduce direct emissions from public sector buildings by 75% against a 2017 baseline by the end of carbon budget 6.
- Significantly reduce energy consumption of commercial, and industrial buildings by 2030.

- Phase out the installation of new natural gas boilers beyond 2035.
- Significantly grow the supply chain for heat pumps to 2028: from installing around 35,000 hydronic heat pumps a year to a minimum market capacity of 600,000 per year by 2028.
- Reduce the costs of installing a heat pump by at least 25-50% by 2025 and to ensure heat pumps are no more expensive to buy and run than gas boilers by 2030.
- Achieve 30-fold increase in heat pumps manufactured and sold within the UK by the end of the decade.
- Grow the market for heat pumps notably via a £450 million Boiler Upgrade Scheme to support households who want to switch with £5,000 grants.
- Improve heat pump appeal by continuing to invest in research and innovation, with the £60 million Net Zero Innovation Portfolio 'Heat Pump Ready' Programme supporting the development of innovation across the sector.
- Ensure all new buildings in England are ready for Net Zero from 2025. To enable this, new standards will be introduced through legislation to ensure new homes and buildings will be fitted with low-carbon heating and high levels of energy efficiency.
- Establish large-scale trials of hydrogen for heating, including a neighbourhood trial by 2023.
- Ensure as many fuel poor homes in England, as reasonably practicable, achieve a minimum energy efficiency rating of band C by the end of 2030.
- Support social housing, low income and fuel poor households via boosting funding for the Social Housing Decarbonisation Fund and Home Upgrade Grant, which aim to improve the energy performance of low income households' homes, support low carbon heat installations and build the green retrofitting sector to benefit all homeowners.
- Scale up low-carbon heat network deployment and to enable local areas to deploy heat network zoning- Heat Network Transformation Programme of £338 million (over 2022/23 to 2024/25).

**7.20 The Energy Performance of Buildings Regulations (2021)**<sup>229</sup>: Seek to improve the energy efficiency of buildings, reducing their carbon emissions and lessening the impact of

<sup>228</sup> Department for Business, Energy & Industrial Strategy (2021). Heat and buildings strategy. (see <https://www.gov.uk/government/publications/heat-and-buildings-strategy>)

<sup>229</sup> HM Government (2021). The Energy Performance of Buildings Regulations. (see <https://www.legislation.gov.uk/uksi/2012/3118/contents/made>)

climate change. The Regulations require the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance, reported through Energy Performance Certificates and Display Energy Certificates.

**7.21 The Energy white paper: Powering our net zero future (2020)**<sup>230</sup>: Builds on the Prime Minister's Ten point plan for a green industrial revolution. The white paper addresses the transformation of the UK's energy system, promoting high-skilled jobs and clean, resilient economic growth during its transition to net-zero emissions by 2050.

**7.22** Key aims of the paper include:

- Supporting green jobs - The government aims to support up to 220,000 jobs in the next 10 years. Several will be supported via a "major programme" that will see the retrofitting of homes for improved energy efficiency and clean heat.
- Transforming the energy system - To transform its electricity grid for net-zero, the white paper highlights how this will involve changing the way the country heats its homes, how people travel, doubling the electricity use, and harnessing renewable energy supplies.
- Keeping bills affordable - The government aims to do this by making the energy retail market "truly competitive". This will include offering people a simple method of switching to a cheaper energy tariff and testing automatically switching consumers to fairer deals to tackle "loyalty penalties".
- Generating emission-free electricity by 2050 - The government aims to have "overwhelmingly decarbonised power" in the 2030s in order to generate emission-free electricity by 2050.
- Establishing UK Emissions Trading Scheme - The government aims to establish a UK Emissions Trading Scheme (UK ETS) from 1 January 2021 to replace the current EU ETS at the end of the Brexit Transition Period.
- Exploring new nuclear financing options - The government said it is continuing to explore a range of financing options for new nuclear with developers including the Regulated Asset Base (RAB) funding model.
- Further commitments to offshore wind - The white paper lays out plans to scale up its offshore wind fleet to 40 gigawatts (GW) by 2030, including 1GW of floating wind, enough to power every home in the country.
- Carbon capture and storage investments - Including £1bn worth of investments in state-of-the-art CCS in four industrial clusters by 2030. With four low-carbon clusters set up by 2030, and at least one fully net-zero cluster by 2040.
- Kick-starting the hydrogen economy - The government plans to work with industry to aim for 5GW of production by 2030, backed up by a new £240m net-zero Hydrogen Fund for low-carbon hydrogen production.
- Investing in electric vehicle charge points- The government plans to invest £1.3bn to accelerate the rollout of charge points for electric vehicles as well as up to £1bn to support the electrification of cars, including for the mass-production of the batteries needed for electric vehicles.
- Supporting the lowest paid with their bills - The government aims to support those with lower incomes through a £6.7bn package of measures that could save families in old inefficient homes up to £400. This includes extending the Warm Home Discount Scheme to 2026 to cover an extra three quarters of a million households and giving eligible households £150 off their electricity bills each winter.
- Moving away from fossil fuel boilers - The government aims, by the mid-2030s, for all newly installed heating systems to be low-carbon or to be appliances that it is confident can be converted to a clean fuel supply.
- Supporting North Sea oil and gas transition - The white paper notes the importance of supporting the North Sea oil and gas transition for the people and communities most affected by the move away from fossil fuels. The government aims to achieve this by ensuring that the expertise of the oil and gas sector be drawn on in developing CCS and hydrogen production to provide new green jobs for the future.

**7.23 Planning Act 2008**<sup>231</sup>: The Planning Act 2008 was amended under the Environmental Assessments and Miscellaneous Planning (EU Exit) Regulations 2018. Section 182 places a legal duty on local planning authorities to ensure that their development plan documents include policies to ensure that development and use of land in their area contributes to the mitigation of, and adaptation to, climate change.

<sup>230</sup> Department for Business, Energy & Industrial Strategy (2020). Energy white paper: Powering our net zero future. (see <https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future>)

<sup>231</sup> HM Government (2008). Planning Act 2008. (see <http://www.legislation.gov.uk/ukpga/2008/29/contents>)



**7.24 Planning and Energy Act (2008)**<sup>232</sup>: enables local planning authorities to set requirements for carbon reduction and renewable energy provision. It should be noted that while the Housing Standards Review proposed to repeal some of these provisions, at the time of writing there have been no amendments to the Planning and Energy Act.

**7.25 Climate Change Act 2008**<sup>233</sup>: Sets targets for UK greenhouse gas emission reductions of at least 100% by 2050 and CO<sub>2</sub> emission reductions of at least 26% by 2015, against a 1990 baseline (in 2008 the target was set at 80%, however the target has recently been amended in 2019 by Statutory Instrument No.1056 to 100%).

**7.26 The Flood and Water Management Act (2010)**<sup>234</sup>: The Act aims to reduce the flood risk associated with extreme weather. It provides for better, more comprehensive management of flood risk for people, homes and businesses, helps safeguard community groups from unaffordable rises in surface water drainage charges, and protects water supplies to the consumer.

**7.27 The Flood and Water Regulations (2019)**<sup>235</sup>: Sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

**7.28 Environment Act, Government Legislation (1995)**<sup>236</sup>: The act notes the establishment of the Environment Agency and the Scottish Environment Protection Agency. It provides guidance on these agencies and sets environmental management standards.

**7.29 The UK Renewable Energy Strategy**<sup>237</sup>: Sets out the ways in which we will tackle climate change by reducing our CO<sub>2</sub> emissions through the generation of a renewable electricity, heat and transport technologies.

**7.30 The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK**<sup>238</sup>: Aims to realise the wider energy efficiency potential that is available in the UK economy by maximising the potential of existing dwellings by implementing 21st century energy management initiatives on 19th century homes.

**7.31 The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate**<sup>239</sup>: Sets out visions for the following sectors:

- People and the Built Environment – “to promote the development of a healthy, equitable and resilient population, well placed to reduce the harmful health impacts of climate change...buildings and places (including built heritage) and the people who live and work in them are resilient and organisations in the built environment sector have an increased capacity to address the risks and make the most of the opportunities of a changing climate.”
- Infrastructure – “an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate.”
- Natural Environment – “the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides.”
- Business and Industry – “UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change.”
- Local Government – “Local government plays a central role in leading and supporting local places to become more resilient to a range of future risks and to be prepared for the opportunities from a changing climate.”

<sup>232</sup> HM Government (2008). Planning and Energy Act 2008. (see <https://www.legislation.gov.uk/ukpga/2008/21>)

<sup>233</sup> HM Government (2008). Climate Change Act 2008. (see [https://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga\\_20080027\\_en.pdf](https://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga_20080027_en.pdf))

<sup>234</sup> HM Government (2010). Flood and Water Management Act 2010. (see [http://www.legislation.gov.uk/ukpga/2010/29/pdfs/ukpga\\_20100029\\_en.pdf](http://www.legislation.gov.uk/ukpga/2010/29/pdfs/ukpga_20100029_en.pdf))

<sup>235</sup> HM Government (2019). The Flood and Water Regulations. (see <https://www.legislation.gov.uk/ukdsi/2019/9780111176283/contents>)

<sup>236</sup> HM Government (1995). Environment Act. (see <http://www.legislation.gov.uk/ukpga/1995/25/contents>)

<sup>237</sup> HM Government (2009). The UK Renewable Energy Strategy. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/228866/7686.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228866/7686.pdf))

<sup>238</sup> Department of Energy & Climate Change (2012). The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/65602/6927-energy-efficiency-strategy--the-energy-efficiency.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/65602/6927-energy-efficiency-strategy--the-energy-efficiency.pdf))

<sup>239</sup> HM Government (2018). The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/727252/national-adaptation-programme-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727252/national-adaptation-programme-2018.pdf))

**7.32 UK Climate Change Risk Assessment 2017<sup>240</sup>:** Sets out six priority areas needing urgent further action over the next five years in order to minimise risk from the effects of climate change. These priority areas include: flooding and coastal change risk to communities, businesses and infrastructure; risks to health, wellbeing and productivity from high temperatures; risk of shortages in the public water supply and for agriculture, energy generation and industry; risks to natural capital; risks to domestic and international food production and trade; and new and emerging pests and diseases and invasive species.

**7.33 Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England<sup>241</sup>:** This Strategy sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are to:

- Manage the risk to people and their property.
- Facilitate decision-making and action at the appropriate level – individual, community or local authority, river catchment, coastal cell or national.
- Achieve environmental, social and economic benefits, consistent with the principles of sustainable development.

**7.34 Environmental Improvement Plan 2023<sup>242</sup>:** The Environmental Improvement Plan 2023 for England is the first revision of the 25 Year Environment Plan. It builds on the vision of 25 Year Environment Plan with a new plan setting out how Defra will work with landowners, communities and businesses to deliver each of its goals for improving the environment, matched with interim targets to measure progress. Under the plan the Government will protect 30% of England's land and sea for nature. The document identifies ten goals upon which action will be focused. Goals of most relevance in terms of responding to climate change are maximise our resources, minimise our waste; mitigating and adapting to climate change; and reduced risk from

environmental hazards. The Environmental Improvement Plan elaborates on these goals as follows:

- Maximise our resources, minimise our waste:
  - We will minimise waste, reuse materials as much as we can and manage materials at the end of their life to minimise the impact on the environment.
- Mitigating and adapting to climate change:
  - Take all possible action to mitigate climate change, while adapting to reduce its impact.
- Reduced risk of harm from environmental hazards:
  - We will reduce the risk of harm to people, the environment and the economy from natural hazards including flooding, drought, and coastal erosion.

**7.35 The national flood and coastal erosion risk management strategy for England (2011)<sup>243</sup>:** This Strategy builds on existing approaches to flood and coastal risk management and promotes the use of a wide range of measures to manage risk. The strategy forms the framework within which communities have a greater role in local risk management decisions and sets out the Environment Agency's strategic overview role in flood and coastal erosion risk management.

**7.36 Flood and Coastal Erosion Risk Management: Policy Statement (2020)<sup>244</sup>:** This Policy Statement sets out the government's long-term ambition to create a nation more resilient to future flood and coastal erosion risk, and in doing so, reduce the risk of harm to people, the environment and the economy. The Policy Statement sets out five policy areas which will drive this ambition. These are:

- Upgrading and expanding national flood defences and infrastructure.
- Managing the flow of water more effectively.
- Harnessing the power of nature to reduce flood and coastal erosion risk and achieve multiple benefits.
- Better preparing our communities.

<sup>240</sup> HM Government (2017). UK Climate Change Risk Assessment. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/584281/uk-climate-change-risk-assess-2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/584281/uk-climate-change-risk-assess-2017.pdf))

<sup>241</sup> HM Government (2011). Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/228898/9780108510366.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228898/9780108510366.pdf))

<sup>242</sup> HM Government (2023). Environmental Improvement Plan 2023. (see <https://www.gov.uk/government/publications/environmental-improvement-plan>).

<sup>243</sup> Environment Agency (2011). Understanding the risks, empowering communities, building resilience. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/228898/9780108510366.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228898/9780108510366.pdf)).

<sup>244</sup> HM Government (2020). Flood and coastal erosion risk management: Policy Statement. (see <https://assets.publishing.service.gov.uk/media/5f1adc7dd3bf7f596b135ac8/flood-coastal-erosion-policy-statement.pdf>)

- Enabling more resilient places through a catchment-based approach.

**7.37 Suffolk Climate Action Plan (2017)**<sup>245</sup>: This is the third 'Suffolk Climate Action Plan' produced by the Suffolk Climate Change Partnership. The Plan presents the Partners' commitment to facilitate a reduction in absolute carbon emissions in Suffolk of 25% on 2010 levels by 2025 and 75% by 2050, in line with the UK Climate Change Act 2008.

### Sub-national

**7.38 Anglian river basin district Flood Risk Management Plan 2021-27**<sup>246</sup>: The plan determines the risk of flooding from rivers, the sea, surface water, groundwater and reservoirs in the Anglian river basin district. Risk management authorities can use the plan to manage flood and coastal erosion risk.

**7.39 Transforming Suffolk, Suffolk's Community Strategy 2008 to 2028**<sup>247</sup>: Sets out ambitions for Suffolk to be recognised for its outstanding environment and quality of life for all. The strategy aims to help make Suffolk the greenest county by enhancing the natural environment while also being an exemplar when tackling climate change.

**7.40 Suffolk Climate Emergency Plan (2021)**<sup>248</sup>: This Plan has been agreed by Suffolk's Public Sector Leaders and will support a commitment to a green economic recovery in Suffolk as well as addressing the urgent need to deal with the climate emergency.

**7.41 Suffolk Flood Risk Management Strategy (2016)**<sup>249</sup>: Aims to impact the activities of all flood risk management authorities and is an important tool to help everyone manage flood risk. The relevant companies and bodies have a duty with regards to the strategy. The strategy focuses on local

flooding from surface water, ground water or ordinary water course such as ditches and streams.

**7.42 East Suffolk Catchment Flood Management Plan 2009**<sup>250</sup>: The plan has assessed inland flood risk from rivers, ground water, surface water and tidal flooding within East Suffolk. The plan establishes flood risk management policies which will deliver sustainable flood risk management.

**7.43 Great Ouse Catchment Flood Management Plan 2011**<sup>251</sup>: The plan has assessed inland flood risk from rivers, ground water, surface water and tidal flooding within Great Ouse. The plan establishes flood risk management policies which will deliver sustainable flood risk management.

**7.44 North Essex Catchment Flood Management Plan 2009**<sup>252</sup>: The plan has assessed inland flood risk from rivers, ground water, surface water and tidal flooding within North Essex. The plan establishes flood risk management policies which will deliver sustainable flood risk management.

**7.45 Broadland Rivers Catchment Flood Management Plan 2009**<sup>253</sup>: The plan has assessed inland flood risk from rivers, ground water, surface water and tidal flooding within Broadland Rivers. The plan establishes flood risk management policies which will deliver sustainable flood risk management.

**7.46 Sudbury and Great Cornard Surface Water Management Plan 2019**<sup>254</sup>: The plan is a study to understand the flood risk in the local area, identify a range of options to manage the risk and then implement and review the action plan.

**7.47 Local Energy East Strategy (2018)**<sup>255</sup>: The three Local Enterprise Partnership (LEP) areas of Cambridgeshire and Peterborough, Hertfordshire and New Anglia have joined

<sup>245</sup> Suffolk County Council (2017). Suffolk Climate Action Plan. (see <http://www.greensuffolk.org/assets/Greenest-County/SCCP/Climate-Change/Suffolk-Climate-Action-Plan-3.pdf>)

<sup>246</sup> Environment Agency (2022). Anglian river basin district Flood Risk Management Plan. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1118190/Anglian-FRMP-2021-2027.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1118190/Anglian-FRMP-2021-2027.pdf))

<sup>247</sup> Suffolk Strategic Partnership (2008). Transforming Suffolk 2008-2028. (see [https://www.ipswich.gov.uk/sites/default/files/scd07\\_-\\_suffolk\\_community\\_strategy.pdf](https://www.ipswich.gov.uk/sites/default/files/scd07_-_suffolk_community_strategy.pdf))

<sup>248</sup> Suffolk County Council (2021). The Suffolk Climate Emergency Plan. (see <https://www.suffolk.gov.uk/asset-library/imported/suffolk-climate-emergency-plan.pdf>)

<sup>249</sup> Suffolk Flood Risk Management Partnership (2018). Suffolk Flood Risk Management Strategy. (see <http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/2018-Strategy-Documents/2016-04-Suffolk-Flood-Risk-Management-Strategy-v12.pdf>)

<sup>250</sup> Environment Agency (2009). East Suffolk Catchment Flood Management Plan. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/288886/East\\_Suffolk\\_Catchment\\_Flood\\_Management\\_Plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/288886/East_Suffolk_Catchment_Flood_Management_Plan.pdf))

<sup>251</sup> Environment Agency (2011). Great Ouse Catchment Management Plan. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/288877/Great\\_Ouse\\_Catchment\\_Flood\\_Management\\_Plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/288877/Great_Ouse_Catchment_Flood_Management_Plan.pdf))

<sup>252</sup> Environment Agency (2009). North Essex Catchment Flood Management Plan. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/288888/North\\_Essex\\_Catchment\\_Flood\\_Management\\_Plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/288888/North_Essex_Catchment_Flood_Management_Plan.pdf))

<sup>253</sup> Environment Agency (2009). Broadland Rivers Catchment Flood Management Plan: Broadland Rivers Catchment Flood Management Plan 2009. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/288882/Broadland\\_Rivers\\_Catchment\\_Flood\\_Management\\_Plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/288882/Broadland_Rivers_Catchment_Flood_Management_Plan.pdf))

<sup>254</sup> BMT (2019). Sudbury and Great Cornard Surface Water Management Plan. (see <http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Surface-Water-Management-Plans/FINALSudburyandGreatCornardSWMPv3.pdf>)

<sup>255</sup> Tri-LEP (2018). Local Energy East Strategy. (see <https://www.energyhub.org.uk/wp-content/uploads/2019/09/LEE-Energy-Strategy.pdf>)



together to create a tri-LEP area project. The Strategy sets out the tri-LEP's collective ambitions to 2030 based on the following themes: (1) clean economic growth; (2) housing growth and commercial site infrastructure; (3) secure, local, affordable, low-carbon consumption; and (4) clean transport networks.

**7.48 Carbon Reduction Management Plan (2020)**<sup>256</sup>: The plan comprises a number of proposals that set the foundations for how Babergh and Mid Suffolk District Councils will conduct their work going forwards. The plan has key actions that will take place in the short term, with the ability to start work immediately on longer term aspirations so that they can be timetabled into later versions of the plan. There are clear actions around energy, fuel and working remotely that will see the Councils working very differently. Some actions require a change in culture, such as removing paper and working more virtually.

## Current baseline

**7.49** In Suffolk, climate change poses particular serious risks as the county is characterised by its long, low-lying coastline. The ageing population, alongside children, will be particularly at risk from climate change as rising temperatures in the summer coupled with milder temperatures during winter months will become increasingly detrimental. There will be an increase in the intensity and frequency of extreme weather events as a result of climate change.

**7.50** The Tyndall Centre provides 'carbon budgets' for local authorities relating to carbon emission limits authorities will need to achieve to support the "well below 2°C and pursuing 1.5°C" global temperature target and equity principles in the United Nations Paris Agreement.

**7.51** For Babergh to make its 'fair' contribution towards the Paris Climate Change Agreement, the following recommendations are made:

- Stay within a maximum cumulative carbon dioxide emissions budget of 7.2 million tonnes (MtCO<sub>2</sub>) for the period of 2020 to 2100. At 2017 CO<sub>2</sub> emission levels, Babergh would use this entire budget within 6 years from 2020.
- Initiate an immediate programme of CO<sub>2</sub> mitigation to deliver cuts in emissions averaging a minimum of -

13.9% per year to deliver a Paris aligned carbon budget. These annual reductions in emissions require national and local action, and could be part of a wider collaboration with other local authorities.

- Reach zero or near zero carbon no later than 2041.

**7.52** For Mid Suffolk to make its 'fair' contribution towards the Paris Climate Change Agreement, the following recommendations are made:

- Stay within a maximum cumulative carbon dioxide emissions budget of 4.0 million tonnes (MtCO<sub>2</sub>) for the period of 2020 to 2100. At 2017 CO<sub>2</sub> emission levels, would use this entire budget within 6 years from 2020.
- Initiate an immediate programme of CO<sub>2</sub> mitigation to deliver cuts in emissions averaging a minimum of - 13.8% per year to deliver a Paris aligned carbon budget. These annual reductions in emissions require national and local action, and could be part of a wider collaboration with other local authorities.
- Reach zero or near zero carbon no later than 2041<sup>257</sup>.

## Climate emergency

**7.53** In July 2019, BMSDC declared a Climate Emergency. The Environment and Climate Change Task Force was subsequently set up to look at the climate challenge being faced in both Districts, and to explore ways the Councils can work towards their ambition to become carbon neutral by 2030. Following engagement with environmental experts, the task force presented their recommendations to cabinets in July 2020, the proposals of which were unanimously approved, forming the two Councils' first Carbon Reduction Management Plan<sup>258</sup>.

## Climate change mitigation

**7.54** Between 2005 and 2021 in Babergh District, per capita carbon emissions fell from 8.1 tonnes to 6.1. In Mid Suffolk District, per capita emissions are higher and fell from 9.5 to 7.5 tonnes over the same period, which is above the county, regional, and national averages. As of 2021, the average for Suffolk County was 6.2 tonnes per capita, and the national average was 5.5 tonnes per capita. Therefore, both Districts are underperforming against the county and national averages.

<sup>256</sup> BMSDC (2020). Appendix A – Carbon Reduction Management Plan. (see <https://baberghmidsuffolk.moderngov.co.uk/documents/s19374/Appendix%20A%20-%20Carbon%20Reduction%20Management%20Plan.pdf>)

<sup>257</sup> Tyndall Centre and University of Manchester (2024) Quantifying the implications of the United Nations Paris Agreement (see <https://carbonbudget.manchester.ac.uk/reports/>)

<sup>258</sup> BMSDC (2020). Appendix A – Carbon Reduction Management Plan. (see <https://baberghmidsuffolk.moderngov.co.uk/documents/s19374/Appendix%20A%20-%20Carbon%20Reduction%20Management%20Plan.pdf>)

**7.55** As set out in **Table 7.1**, both Babergh and Mid Suffolk achieved overall reductions in carbon emissions between 2005 and 2021, at 48% and 36% respectively. In both cases, these reductions were mostly due to progress in reducing emissions from industrial and commercial sectors, closely followed by domestic sources, with minimal progress on transport emissions. Transport makes the largest contribution to carbon emissions in both Districts.

**7.56** The Suffolk Climate Change Partnership, which consists of Suffolk's local authorities and the Environment Agency, working with other organisations locally, published a Suffolk Climate Action Plan<sup>259</sup> in 2017. According to this document,

the County is trending around a 32% reduction in absolute emissions between 2010 and 2025, against their target of 35%.

**7.57** The proportion of emissions in the East of England in comparison to other regions was approximately 9.5% in 2021, which made the East of England the fourth highest emitter behind the North West and South East (both 11%), Scotland (10.2%), and Yorkshire and the Humber (9.7%)<sup>260</sup>.

**7.58** Between 2005 and 2021, the East of England has seen a percentage decrease of 20% in total CO<sub>2</sub> emissions. In 2005, total emissions were 58 Mt CO<sub>2</sub> (Metric Tons of Carbon Dioxide) and in 2021 total emission were 38 Mt CO<sub>2</sub><sup>261</sup>

**Table 7.1 Carbon dioxide emissions in Babergh and Mid Suffolk Districts (shown as kilo tonnes)**

| Year               | Industrial and Commercial | Domestic | Transport | Total  |
|--------------------|---------------------------|----------|-----------|--------|
| <b>Babergh</b>     |                           |          |           |        |
| 2005               | 231.80                    | 227.80   | 257.50    | 904.20 |
| 2021               | 104.7                     | 140.3    | 225.9     | 470.9  |
| % of total (2021)  | 22%                       | 30%      | 48%       |        |
| Change (2005-2021) | -55%                      | -38%     | -12%      | -48%   |
| <b>Mid Suffolk</b> |                           |          |           |        |
| 2005               | 332.20                    | 245.90   | 305.10    | 863.70 |
| 2021               | 134.5                     | 152      | 267.8     | 554.3  |
| % of total (2021)  | 24%                       | 27%      | 48%       |        |
| Change (2005-2021) | -60%                      | -38%     | -12%      | -36%   |

**7.59** According to both Councils' Climate Change and Biodiversity Annual Reports<sup>262, 263</sup>, the Councils' two largest carbon emitters were their leisure centres and waste vehicles. In response to this Babergh and Mid Suffolk have become the

first rural UK councils to switch its fleet to Hydrotreated Vegetable Oil, which is expected to result in a 90% reduction in emissions. Further to this, the Councils' two leisure centres

<sup>259</sup> Suffolk Climate Change Partnership (2017). Suffolk Climate Action Plan: Fostering business and community resilience, reducing carbon emission and increasing local economic growth. (see <http://www.greensuffolk.org/assets/Greenest-County/SCCP/Climate-Change/Suffolk-Climate-Action-Plan-3.pdf>)

<sup>260</sup> Department for Business, Energy & Industrial Strategy (2023). UK local authority carbon dioxide emission estimates 2021. (see <https://assets.publishing.service.gov.uk/media/64a67cc37a4c230013bba230/2005-21-local-authority-ghg-emissions-statistical-release-update-060723.pdf>)

<sup>261</sup> Department for Business, Energy & Industrial Strategy (2023). UK local authority carbon dioxide emission estimates 2021. (see

<https://assets.publishing.service.gov.uk/media/64a67cc37a4c230013bba230/2005-21-local-authority-ghg-emissions-statistical-release-update-060723.pdf>)

<sup>262</sup> Babergh District Council (2021). Climate Change and Biodiversity Annual Report. (see <https://www.babergh.gov.uk/assets/Environment/Climate-change-and-biodiversity-annual-report-Babergh.pdf>)

<sup>263</sup> Mid Suffolk District Council (2021). Climate Change and Biodiversity Annual Report. (see <https://www.babergh.gov.uk/assets/Environment/Climate-change-and-biodiversity-annual-report-Mid-Suffolk.pdf>)

have transferred to certified low carbon tariffs for electricity use.

**7.60** With regard to renewable energy generation, 1,100 Babergh owned homes and 900 Mid Suffolk owned homes have had solar panels installed to generate electricity. In 2022-23, approximately 100 schemes involving renewable energy were approved in the District. These are primarily photovoltaic solar energy projects (including roof mounted solar panels), but also included five householder wind turbines<sup>264</sup>. Authorities through the Suffolk Solar Together scheme offer residents discounted rates for the installation of solar panels for their homes. Between April 2019 and November 2021 Babergh and Mid Suffolk installed 135 and 114 Air Source Heat Pumps in council owned homes, respectively. A number of these have been funded through the Warm Homes Fund<sup>265, 266</sup>. Between 2020 and 2022, Babergh installed 85 Air Source Heat Pumps in council-owned homes<sup>267</sup>. In 2023, Babergh and Mid Suffolk District Councils finished building solar carports over more than 110 of their existing car parking spaces to help power their leisure centres. Babergh and Mid Suffolk among the UK's first rural local authorities to trial the technology, which will reduce the centres' reliance on the grid and cut carbon emissions. 70 solar carports are located at Mid Suffolk Leisure Centre in Stowmarket, providing up to almost 24% of the centre's annual electricity demand. The remaining 40 are located at Kingfisher Leisure Centre in Sudbury, providing over 16% of its annual electricity demand. The carports, installed by East Anglia-based Polysolar, will generate a combined 292,000 kilowatts (kWh) a year. This equates to a combined annual reduction of 62 tonnes of carbon emissions (CO<sub>2</sub>e) produced by the centres<sup>268</sup>.

### Climate change adaptation

**7.61** The Met Office has released the UK Climate Projections: Headline Findings in 2022<sup>269</sup> (UKCP), which provides up to date information on how the climate of the UK is expected to change in the period to the end of the 21st Century. In the

highest emissions scenario, summer temperatures in the UK could be 6.8°C warmer by 2070 than the average summer between 1981 and 2000. Average summer rainfall would fall by 47% in this scenario, along with an increase in the frequency of hot spells. Winters could be up to 3.8°C warmer, with up to 25% more rainfall by 2070. With regard to future precipitation change, rainfall patterns across the UK are not uniform, and vary on seasonal and regional scales and will continue to vary in the future.

**7.62** Changes to the climate will bring new challenges to BMSDC's natural environments. Hotter, drier summers may have adverse health impacts and may exacerbate the adverse environmental effects of air and water pollution. Fluvial and surface water flooding is significant within Babergh and Mid Suffolk and is prevalent across both Districts. Significant rivers and tributaries that contribute towards flood risk within the Districts include, but are not limited to, the Stour, Gipping, Waveney, Brett, Dove and Deben Rivers. In addition, rainwater frequently drains into underground sewer systems, which can become overwhelmed during storm events and become blocked, resulting in flooding of the surrounding area. Warmer, wetter winters and more intense rainfall could lead to more frequent and severe flooding events, both from watercourses breaching their banks and from surface water run-off and rising groundwater. There are several rivers in the Plan area that are tidally influenced. In the south east corner of Babergh District, there is a risk of tidal flooding from the Stour and Orwell estuaries. Tidal flooding should be considered for the present as well as the future, due to predicted increases in sea level<sup>270</sup>. There are extensive low-lying areas of coastline at high risk of tidal flooding and expected future sea level rise will have significant implications for new and existing development situated in these areas<sup>271</sup>.

**7.63** Figure 7.1 shows Flood Risk Zones 2 and 3 in the Districts, which are those areas at greatest risk of flooding from either rivers or the sea.

**7.64** A changing climate may place pressure on some native species and create conditions suitable for new species,

<sup>264</sup> BMSDC (2023). Babergh and Mid Suffolk Joint Authority Monitoring Report. (see <https://prod-babergh.baberghmidsuffolk.dp.placecube.com/documents/d/asset-library-54706/babergh-and-mid-suffolk-2022-23-amr-1>)

<sup>265</sup> Babergh District Council (2021). Climate Change and Biodiversity Annual Report. (see <https://www.babergh.gov.uk/assets/Environment/Climate-change-and-biodiversity-annual-report-Babergh.pdf>)

<sup>266</sup> Mid Suffolk District Council (2021). Climate Change and Biodiversity Annual Report. (see <https://www.babergh.gov.uk/assets/Environment/Climate-change-and-biodiversity-annual-report-Mid-Suffolk.pdf>)

<sup>267</sup> BDC (2022). Public Document Pack (see <https://baberghmidsuffolk.moderngov.co.uk/documents/g3163/Public%20reports%20pack%2007th-Mar-2022%2014.00%20Babergh%20Cabinet.pdf?T=10>)

<sup>268</sup> NewAnglia Local Enterprise Partnership for Norfolk and Suffolk (2023). Pioneering Councils complete £2.8m carbon-cutting solar investment (see <https://newanglia.co.uk/pioneering-councils-complete-2-8m-carbon-cutting-solar-investment/>)

<sup>269</sup> Met Office (2022). UK Climate Projections: Headline Findings August 2022 (see [https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/ukcp/ukcp18\\_headline\\_findings\\_v4\\_aug22.pdf](https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/ukcp/ukcp18_headline_findings_v4_aug22.pdf)).

<sup>270</sup> JBA Consulting (2020). Babergh & Mid Suffolk Level 2 Strategic Flood Risk Assessment Final Report ( see <https://prod-babergh.baberghmidsuffolk.dp.placecube.com/documents/d/asset-library-54706/sfra-level-2-october-2020->)

<sup>271</sup> Suffolk Coastal District Council and Ipswich Borough Council (2019). Cross Boundary Water Cycle Study. (see [https://www.ipswich.gov.uk/sites/default/files/cross-boundary-water-cycle-study\\_jan\\_2019.pdf](https://www.ipswich.gov.uk/sites/default/files/cross-boundary-water-cycle-study_jan_2019.pdf))



including invasive non-native species. Protection and enhancement of the natural landscape is critical to mitigating and adapting to climate change given its significant role in carbon sequestration, flood storage/management and maintaining water quality.

**7.65** The Councils also aim to help the Government deliver the 25-year Environment Plan and help increase the powers and resources available to local authorities to address climate change<sup>272</sup>.

### Future baseline and likely evolution without the Part 2 Joint Local Plan

**7.66** There is potential for the Districts to be subject to more frequent extreme weather events as well as increasing potential for flood risk as a result of climate change. Without the Part 2 JLP, sites for development may be located in areas that are prone to the effects of climate change, such as in areas with a higher chance of flooding.

**7.67** Without the JLP Part 2, development sites may be located in inaccessible locations that increase reliance on private vehicles, although the shift to electric vehicles may

help reduce emissions associated with private vehicles. Carbon emissions associated with buildings may be reduced, in response to the amended Building Regulations 2010 and implementation of the Future Buildings Standard from 2025 that require CO<sub>2</sub> emissions from new build homes and other buildings, including offices and shops, to be 30% lower than current standards. This will be achieved through the installation of low carbon technology, such as solar panels and heat pumps, and using materials in a more energy efficient way to keep in heat.

**7.68** Babergh and Mid Suffolk District Councils will continue to have an obligation to reduce carbon emissions with or without the Local Plan. BMSDC’s commitment to becoming carbon neutral by 2030 as provided for through the declaration of the climate emergency, will also continue to apply.

### Key sustainability issues

**7.69** The key sustainability issues for climate change adaptation and mitigation, and the opportunities for the Joint Local Plan Part 2 to address them are shown in **Table 7.2**.

**Table 7.2 Key sustainability issues and opportunities for the Joint Local Plan Part 2 to address them**

| Key sustainability issues for Babergh and Mid Suffolk  | Opportunities for the Joint Local Plan Part 2 to address the key sustainability issues  | Relevant SA objectives  |
|--|---|-------------------------|
| While carbon emissions from all sectors have fallen in both Districts since 2005, BMSDC’s emissions are still above the national and regional averages. There has also been very little progress on transport emissions. Both Councils have committed to meeting net zero by 2030 at the latest, and to meet this will need to make significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure. | The JLP Part 2 provides an opportunity to prioritise the appropriate siting and design of new development, through strategic site allocations, which can facilitate the integration of mixed-use developments with accessible transportation options.   | SA objectives 9 and 16. |
| The effects of climate change in BMSDC are likely to result in extreme weather events (e.g. intense rainfall, prolonged high temperatures and drought) becoming more common and more intense.  | The JLP Part 2 provides an opportunity through strategically distributed housing allocations, to prioritise development in areas with existing infrastructure and amenities, which will minimise the need for commuting and minimise the need for new transport infrastructure, thereby decreasing carbon emissions from transport. Also, designating open spaces within and around urban areas | SA objective 9.         |

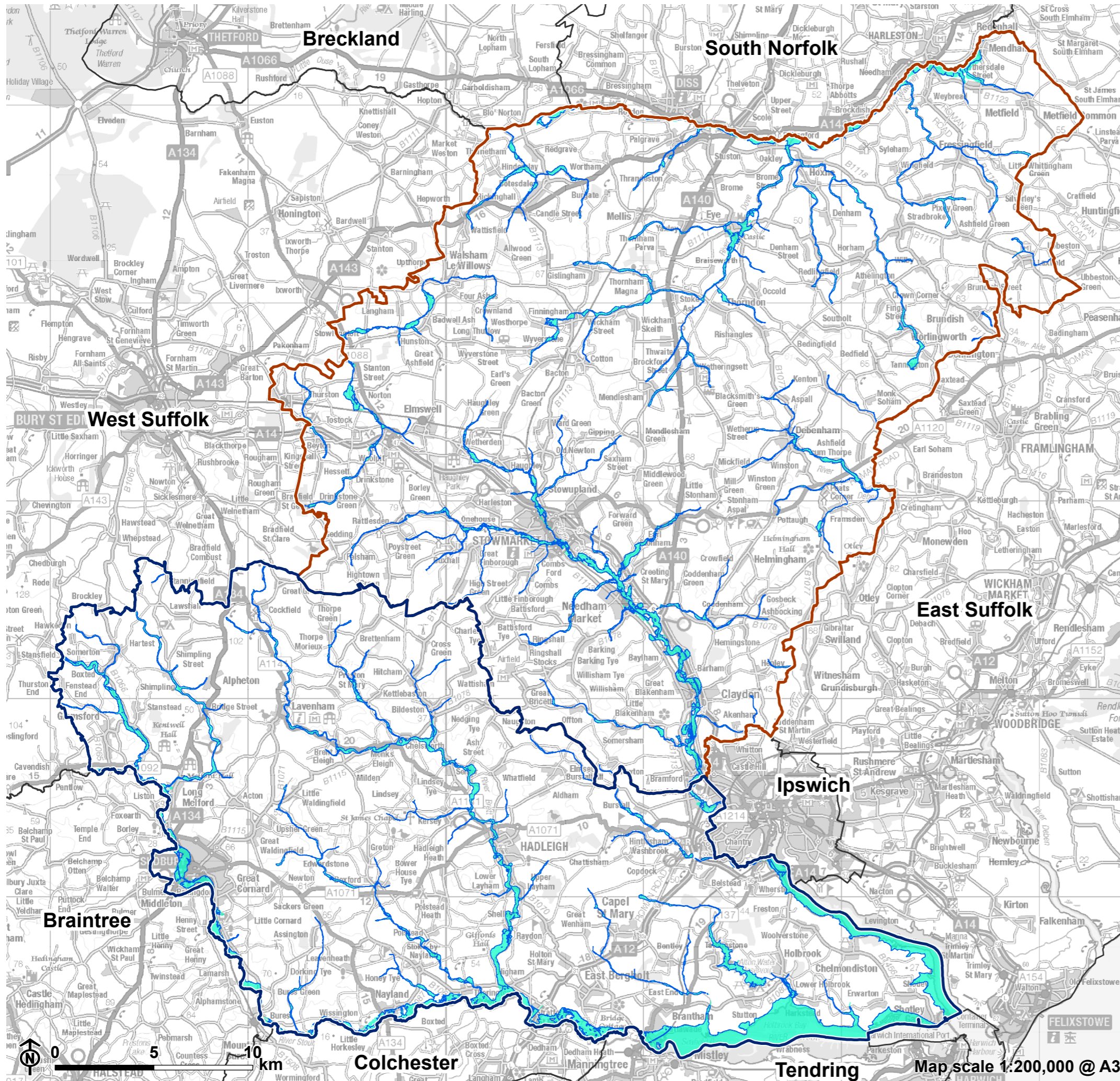
<sup>272</sup> BMSDC (2020). Climate Declaration. (see <https://www.babergh.gov.uk/news/councils-support-2030-carbon-neutral-ambitions/>)

| Key sustainability issues for Babergh and Mid Suffolk   | Opportunities for the Joint Local Plan Part 2 to address the key sustainability issues   | Relevant SA objectives  |
|---|--|-------------------------|
|   | will have numerous climate change mitigation benefits.   |                         |
| BMSDC will need to become more resilient to the increased risk of flooding as a result of climate change. | The JLP Part 2 provides an opportunity, alongside national measures, to mitigate the effects of potential future flooding through appropriate siting of development. | SA objectives 9 and 10. |





Figure 7.1: Flood risk



- Mid Suffolk District
- Babergh District
- Neighbouring local authority
- Flood Zone 2
- Flood Zone 3



# Chapter 8

## Biodiversity

### Policy context

#### National

**8.1** A requirement of the **NPPF's (2023)**<sup>273</sup> environmental objective is that the planning system should contribute to protecting and enhancing the natural environment including helping to improve biodiversity and using natural resources prudently. In support of this aim the framework states that Local Plans should “*identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks*” and should also “*promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*”

**8.2** The framework requires that plans should take a strategic approach in terms of “maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries”.

**8.3** The NPPF is supported by planning practice guidance relating to:

- **Natural environment (2019)**<sup>274</sup> highlights key issues in implementing policy to protect and enhance the natural environment, agricultural land, soils and brownfield land of environmental value, green infrastructure, biodiversity, geodiversity, ecosystems and landscapes.

**8.4 National Planning Practice Guidance**<sup>275</sup>: Supports the NPPF by requiring Local Plans to include strategic policies that conserve and enhance the natural environment through sustainable development.

**8.5 The Environment Act 2021**<sup>276</sup> sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. Biodiversity elements in the Act include:

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<sup>273</sup> Ministry of Housing, Communities and Local Government (2023). National Planning Policy Framework. (see [https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF\\_December\\_2023.pdf](https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf))

<sup>274</sup> Ministry of Housing, Communities and Local Government (2019). Natural Environment. (see <https://www.gov.uk/guidance/natural-environment>)

<sup>275</sup> Ministry of Housing, Communities and Local Government (last updated 1 October 2019). Planning Practice Guidance. (see <https://www.gov.uk/government/collections/planning-practice-guidance>)

<sup>276</sup> HM Government (2021). Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

- Strengthened biodiversity duty. Both onsite and offsite enhancements must be maintained for at least 30 years after completion of a development.
- Biodiversity net gain to ensure developments deliver at least 10% increase in biodiversity.
- Local Nature Recovery Strategies to support a Nature Recovery Network.
- Duty upon Local Authorities to consult on street tree felling.
- Strengthen woodland protection enforcement measures.
- Conservation Covenants.
- Protected Site Strategies and Species Conservation Strategies to support the design and delivery of strategic approaches to deliver better outcomes for nature.
- Prohibit larger UK businesses from using commodities associated with wide-scale deforestation.
- Requires regulated businesses to establish a system of due diligence for each regulated commodity used in their supply chain, requires regulated businesses to report on their due diligence, introduces a due diligence enforcement system.

### 8.6 Natural Environment and Rural Communities Act

**2006**<sup>277</sup>: Places a duty on public bodies to conserve biodiversity. It is set out to protect native species (especially those at threat), control the release of non-native species, enhances the protection of SSSIs and build upon the rights of way rules in the National Parks and Access to the Countryside Act 1949.

### 8.7 Biodiversity 2020: A strategy for England's wildlife and ecosystem services

<sup>278</sup>: Guides conservation efforts in England up to 2020 by requiring a national halt to biodiversity loss, supporting healthy ecosystems and establishing ecological networks. The Strategy includes 22 priorities which include actions for the following sectors: Agriculture, Forestry, Planning & Development, Water Management, Marine Management, Fisheries, Air Pollution and Invasive Non-Native Species.

### 8.8 Biodiversity offsetting in England Green Paper

<sup>279</sup>: Biodiversity offsets are conservation activities designed to compensate for residual losses. The Green Paper sets out a framework for offsetting.

### 8.9 Environmental Improvement Plan 2023

<sup>280</sup>: The Environmental Improvement Plan 2023 for England is the first revision of the 25 Year Environment Plan. It builds on the vision of 25 Year Environment Plan with a new plan setting out how Defra will work with landowners, communities and businesses to deliver each of its goals for improving the environment, matched with interim targets to measure progress. Under the plan the Government will protect 30% of England's land and sea for nature. The goals included in the Environmental Improvement Plan 2023 of most relevance in terms of the conservation and enhancement of biodiversity are thriving plants and wildlife; using resources from nature sustainably; and enhancing biosecurity. The Environmental Improvement Plan elaborates on these goals as follows:

- Thriving plants and wildlife:
  - We will achieve a growing and resilient network of land, water and sea that is richer in plants and wildlife.
- Using resources from nature sustainably:
  - Use resources from nature, such as timber, fish and food, more sustainably and efficiently.
- Enhancing biosecurity:
  - We will enhance biosecurity to protect our wildlife and livestock and boost the resilience of plants and trees.

### Sub-national

### 8.10 Babergh and Mid-Suffolk District Councils' Biodiversity Action Plan (2020)

<sup>281</sup>: sets out how BMSDC aims to protect and strengthen plant life and local wildlife in the district. This includes proposals of environment mapping, tree and hedge planting, meadow planting, a green burial site, an SPD, and bio-diversity campaigning.

### 8.11 Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy –

<sup>277</sup> HM Government (2006). Natural Environment and Rural Communities Act 2006. (see [http://www.legislation.gov.uk/ukpga/2006/16/pdfs/ukpga\\_20060016\\_en.pdf](http://www.legislation.gov.uk/ukpga/2006/16/pdfs/ukpga_20060016_en.pdf))

<sup>278</sup> Department for Environment, Food and Rural Affairs (2011). Biodiversity 2020: A strategy for England's wildlife and ecosystem. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf))

<sup>279</sup> Department for Environment, Food and Rural Affairs (2013). Biodiversity offsetting in England Green Paper. (see

[https://consult.defra.gov.uk/biodiversity/biodiversity\\_offsetting/supporting\\_documents/20130903Biodiversity%20offsetting%20green%20paper.pdf](https://consult.defra.gov.uk/biodiversity/biodiversity_offsetting/supporting_documents/20130903Biodiversity%20offsetting%20green%20paper.pdf))

<sup>280</sup> HM Government (2023). Environmental Improvement Plan 2023. (see <https://www.gov.uk/government/publications/environmental-improvement-plan>)

<sup>281</sup> BMSDC (2020). Biodiversity Action Plan. (see <https://baberghmidsuffolk.moderngov.co.uk/documents/s20689/Appendix%20A%20-%20Biodiversity%20Action%20Plan.pdf>)

**Technical Report (2019)**<sup>282</sup>: Sets out a strategy for sustainable housing growth whilst also adequately protecting European wildlife sites from harm.

### **8.12 Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (2021)**<sup>283</sup>:

This Strategy sets out a tariff based approach to mitigating the impact of recreational disturbance on European Sites resulting from increased housing development across the local authority areas (East Suffolk Council, Ipswich Borough Council and BMSDC). It summarises the requirements of Suffolk Coast RAMS, including the per-dwelling tariff, and provides a framework for implementing those provisions.

**8.13 Suffolk's Nature Strategy (2015)**<sup>284</sup>: This Strategy describes the challenges and opportunities the natural environment presents. It outlines the key natural environment priorities for the County, whilst also setting out how the landscapes and wildlife in Suffolk contribute to economic growth and health and wellbeing.

**8.14** In July 2019 Mid Suffolk District pledged to help protect existing wildlife and biodiversity in the District<sup>285</sup>. This will start with a review of existing potential wildlife corridors in the District and examining ways in which the corridors can be enhanced, working as part of the climate change taskforce.

**8.15** In September 2019 Babergh District pledged to protect wildlife, biodiversity and natural habitats which included wildflower verges and free trees for families, in addition to producing a map showing Babergh's wildlife networks<sup>286</sup>.

**8.16** The Climate Change Task Force mentioned earlier focuses biodiversity, as well as climate change mitigation. The Task Force considers ways in which both the Councils and partnerships can protect and improve the environment and biodiversity. This includes considering actions through their own operations and key stakeholders or partners.

**8.17** Babergh and Mid Suffolk also provide details of national ecological guidance on their website, such as construction near protected areas and wildlife and protected species guidance.

**8.18 A Green Infrastructure Framework for Babergh District (August 2012)**<sup>287</sup>: This Framework identifies key opportunities for the enhancement of Green Infrastructure and future provision/connections in a number of areas, including Ipswich, Hadleigh and Sudbury/Great Cornard/Chilton.

## **Current baseline**

**8.19** There is a need to maintain and develop BMSDC's network of high-quality habitats. In Babergh District are the Orwell and Stour estuaries, which are found on the eastern and south-eastern sides of the District. They have valued wildlife habitats and a distinct character. Both estuaries are Ramsar sites, designated for their international importance as wetlands under the Ramsar Convention and also Special Protection Areas which are European designations, with respect to internationally important populations of birds.

**8.20** Babergh contains 51 Sites of Special Scientific Interest (SSSI), whilst across Mid Suffolk, there are 36 Sites of Special Scientific Interest as well as one National Nature Reserve (Redgrave & Lopham Fen in Mid Suffolk District). Both Districts contain numerous County Wildlife Sites<sup>288</sup> and Local Nature Reserves<sup>289,290,291</sup>. The designated biodiversity and geodiversity sites are shown in **Figure 8.1**. Ancient Woodland is also present across both Districts (**Figure 8.2**).

**8.21** In the past year, Babergh and Mid Suffolk have planted 281 trees and 4,690 hedgerow plants have been distributed to town and parish councils for planting and care. At 10 years old, the carbon sequestered from the 291 trees planted will

<sup>282</sup> Footprint Ecology (2019). Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy. (see <http://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf>)

<sup>283</sup> East Suffolk Council (2021) Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (SPD). (see <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Recreational-Disturbance-Avoidance/Suffolk-Coast-RAMS-SPD-final-May-2021.pdf>)

<sup>284</sup> Suffolk County Council (2015). Suffolk's Nature Strategy. (see <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/suffolks-countryside-and-wildlife/Suffolks-Nature-Strategy-2015.pdf>)

<sup>285</sup> BMSDC (2019). Council takes steps to protect wildlife. (see <https://www.midsuffolk.gov.uk/news/council-takes-steps-to-protect-wildlife/>).

<sup>286</sup> BMSDC (2019). (see <https://www.babergh.gov.uk/news/babergh-pledges-to-protect-wildlife/>)

<sup>287</sup> Babergh District Council (August 2012). A Green Infrastructure Framework for Babergh District. (see

<https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/GIFramework-Aug2012.pdf>)

<sup>288</sup> County Wildlife Sites (CWSs) have been identified throughout Suffolk and range from small meadows, green lanes, dykes and hedges to much larger areas of ancient woodland, heathland, greens, commons and marsh. CWSs complement statutorily protected areas and nature reserves (such as SSSIs and Local and National Nature Reserves) by helping to maintain habitat links between these sites.

<sup>289</sup> The Local Nature Reserves are statutory designations which have wildlife or geological features that are of special interest to the local area.

<sup>290</sup> Babergh District Council (2023). Babergh State of the District Report 2023 (see <https://www.babergh.gov.uk/documents/d/babergh/babergh-state-of-the-district-2023-1>)

<sup>291</sup> Mid Suffolk District Council (2023). Mid Suffolk State of the District Report 2023 (see <https://www.babergh.gov.uk/documents/d/mid-suffolk/mid-suffolk-state-of-the-district-2023-1>)



equate to 7,025kg a year, increasingly annually as the trees grow larger<sup>292,293</sup>.

### Future baseline and likely evolution without the Part 2 Joint Local Plan

**8.22** At the UK level, the publication of the State of Nature Report<sup>294</sup> provides an overview of the health of the country's wildlife and how human impacts are driving sweeping changes in the UK. It considers 50 years of monitoring to see how nature has changed since the 1970s. At the national level during this period, there has been a reported 19% decline in the average abundance of wildlife in the UK, with key drivers for change being agricultural productivity, climate change and increasing average temperatures, urbanisation and hydrological changes. The report finds that on average, metrics suggest that decline in species abundance and distribution of species has continued in the UK throughout the most recent decade. Babergh and Mid Suffolk both contain a number of high-quality habitats, including Sites of Special

Scientific Interest, and Ramsar sites, although the trend of declining biodiversity is reported at the local level. These trends are likely to continue in the absence of concerted action given the need for growth in the Districts. The Environment Act 2021 will, however, help address habitat loss and fragmentation through biodiversity net gain.

**8.23** Even without the Part 2 JLP, some important habitats and biodiversity sites will continue to receive statutory protection. However, without the Part 2 JLP it is possible that development could be sited inappropriately and adversely impact biodiversity sites.

### Key sustainability issues

**8.24** The key sustainability issues for biodiversity, and the opportunities for the JLP Part 2 to address them are shown in **Table 8.1**.

**Table 8.1: Key sustainability issues and opportunities for the Joint Local Plan Part 2 to address them**

| Key sustainability issues for Babergh and Mid Suffolk   | Opportunities for the Joint Local Plan Part 2 to address the key sustainability issues  | Relevant SA objectives |
|---|---|------------------------|
| BMSDC contains and is in close proximity to a number of both designated and non-designated natural habitats and biodiversity. This includes those designated for their national and international importance. Not all SSSIs are in favourable condition.  | The JLP Part 2 presents an opportunity for new development to come forward at the most appropriate locations in order to avoid detrimental impacts on biodiversity assets.  | SA objective11.        |
| Although designated sites represent the most valued habitats in the Plan area, the overall ecological network is also important for biodiversity as a whole and helps to support the health of designated sites, allowing species to migrate in response to climate change. The fragmentation and erosion of habitats and the wider ecological network in BMSDC is an ongoing threat to biodiversity. | The Part 2 JLP provides the opportunity to avoid sensitive areas through the careful distribution of housing allocations. Furthermore, open space designations and relevant development management policies will promote biodiversity gain and to improve the overall ecological network. | SA objective 11.       |

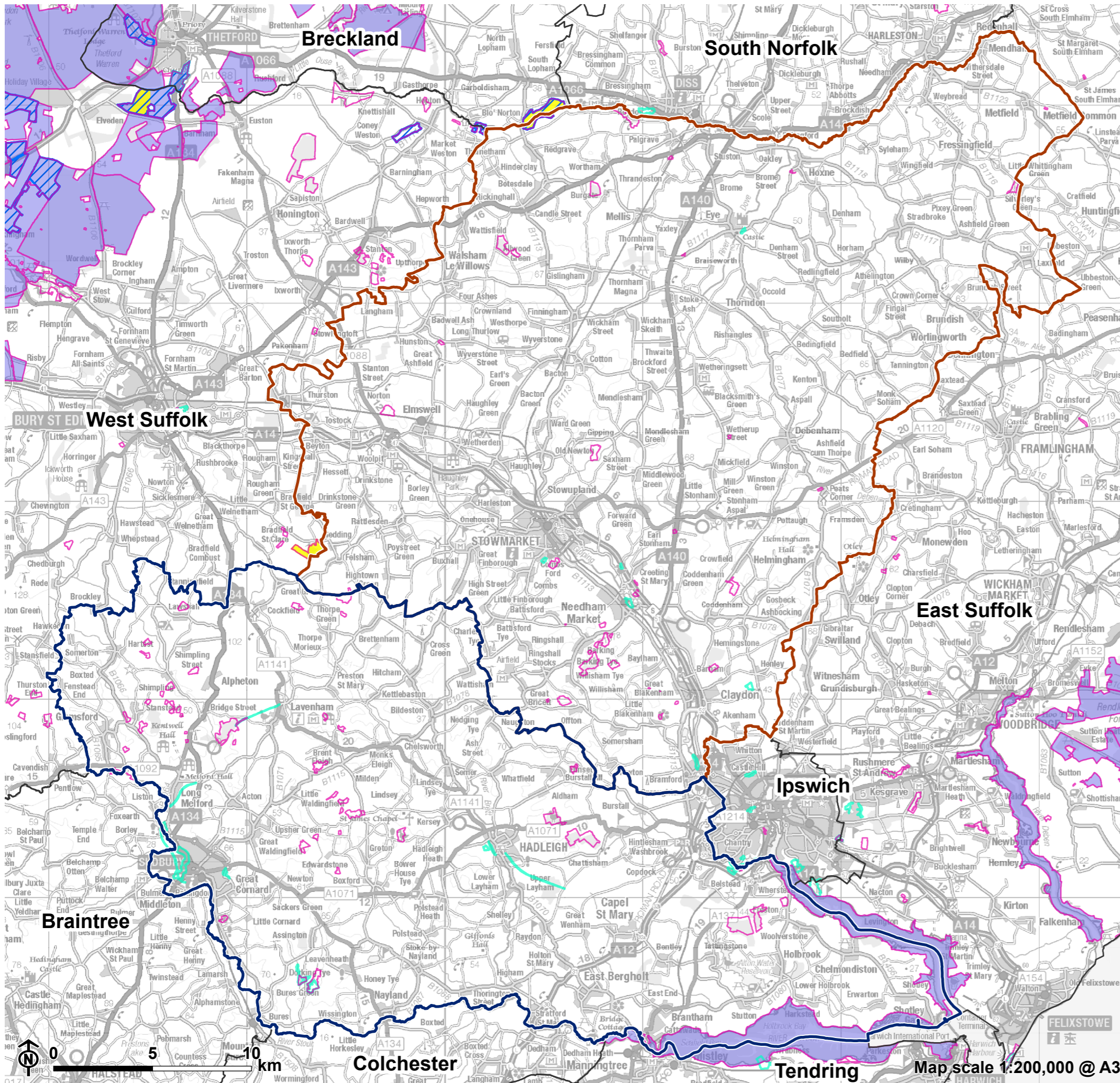
<sup>292</sup> Babergh District Council (2021). Climate Change and Biodiversity Annual Report. (see <https://www.babergh.gov.uk/assets/Environment/Climate-change-and-biodiversity-annual-report-Babergh.pdf>)

<sup>293</sup> Mid Suffolk District Council (2021). Climate Change and Biodiversity Annual Report. (see

<https://www.babergh.gov.uk/assets/Environment/Climate-change-and-biodiversity-annual-report-Mid-Suffolk.pdf>)

<sup>294</sup> State of Nature (2023). State of Nature Report (see <https://stateofnature.org.uk/>)

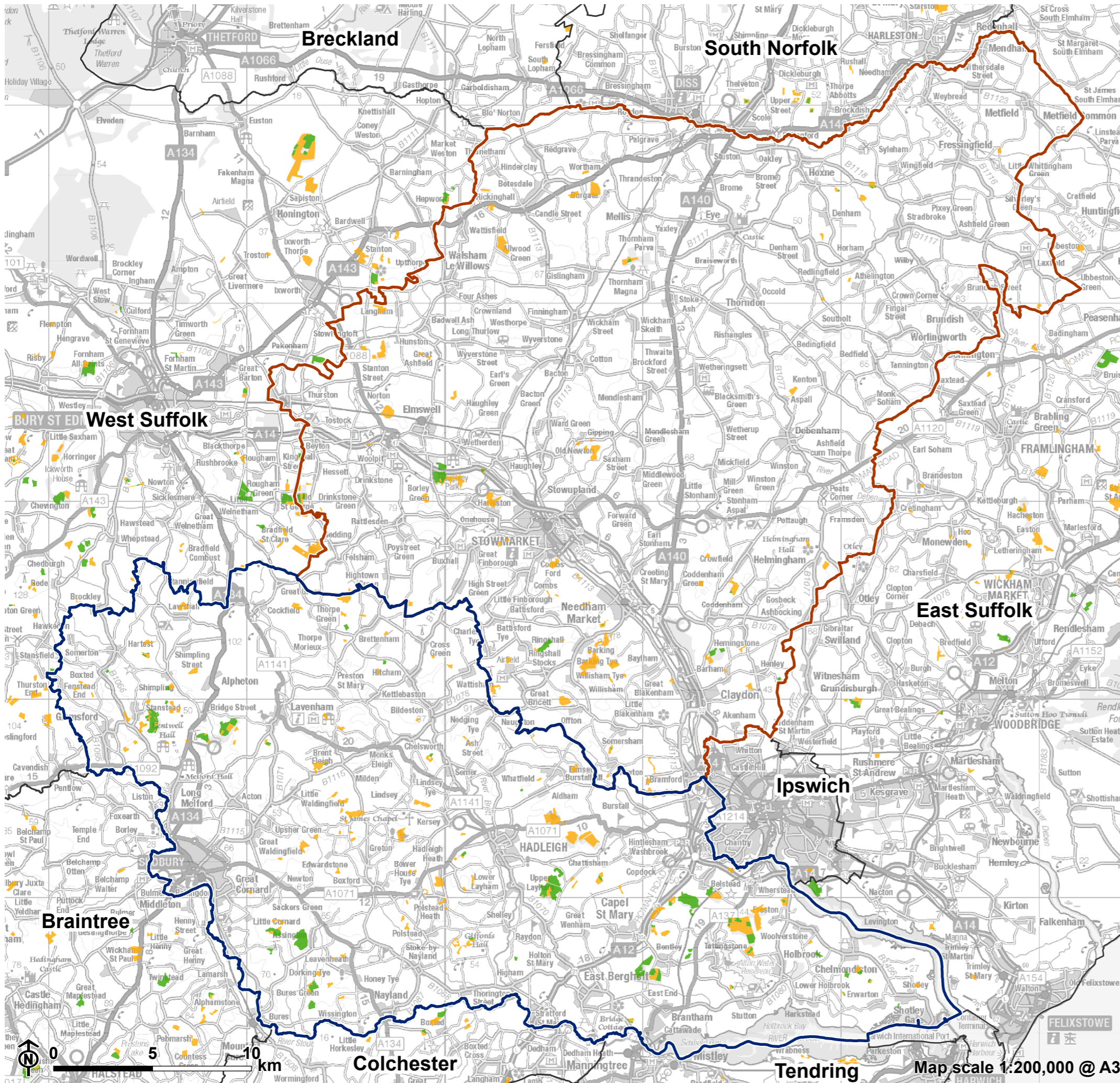









**Figure 8.1: Designated biodiversity and geodiversity assets**

- Mid Suffolk District
- Babergh District
- Neighbouring local authority
- Special Protection Area
- Special Area of Conservation
- Site of Special Scientific Interest
- National Nature Reserve
- Local Nature Reserve





**Figure 8.2: Ancient Woodland Inventory**

-  Mid Suffolk District
-  Babergh District
-  Neighbouring local authority
- Ancient Woodland Inventory**
-  Ancient & Semi-Natural Woodland
-  Ancient Replanted Woodland



# Chapter 9

## Historic environment

### Policy context

#### National

**9.1** Of relevance to the approach of the planning system to the historic environment the **NPPF (2023)**<sup>295</sup> contains an environmental objective to contribute to the protection and enhancement of the built and historic environment. The document also sets out a strategy to seek “*the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay and other threats.*” Such a strategy is required to take into consideration the desirability of sustaining and enhancing the significance of heritage assets and bringing them into viable use.

**9.2** It should also be considerate of the wider benefits of conserving the historic environment, the contribution new development can make in terms of character and distinctiveness and the opportunity for the historic environment to contribute to this character and distinctiveness. Local authorities should also maintain or have access to a historic environment record which is to be supported by up-to-date evidence.

**9.3** The NPPF is supported by planning practice guidance relating to:

- **Historic environment (2019)**<sup>296</sup> advises on enhancing and conserving the historic environment through planning, decision-making, designation, listed building consent processes and consultation.

**9.4 National Planning Practice Guidance**<sup>297</sup>: Supports the NPPF by requiring that Local Plans include strategic policies for the conservation and enhancement of the historic environment, including a positive strategy for the conservation and enjoyment of the historic environment. It also states that local planning authorities should identify specific opportunities for conservation and enhancement of heritage assets.

**9.5 The Environment Act 2021**<sup>298</sup> sets out the UK’s new framework for environmental protection. It includes the

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<sup>295</sup> Ministry of Housing, Communities and Local Government (2023). National Planning Policy Framework. (see [https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF\\_December\\_2023.pdf](https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf))

<sup>296</sup> Ministry of Housing, Communities and Local Government (2019). Historic Environment. (see <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>)

<sup>297</sup> Ministry of Housing, Communities & Local Government (last updated 1 October 2019). Planning Practice Guidance (see <https://www.gov.uk/government/collections/planning-practice-guidance>)

<sup>298</sup> HM Government (2021). Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

creation of Conservation Covenant agreements between a landowner and a responsible body for the purposes of conservation. This can include to preserve land as a place of ‘archaeological, architectural artistic, cultural or historic interest.’

**9.6 Ancient Monuments & Archaeological Areas Act 1979<sup>299</sup>:** a law passed by the UK government to protect the archaeological heritage of England & Wales and Scotland. Under this Act, the Secretary of State has a duty to compile and maintain a schedule of ancient monuments of national importance, in order to help preserve them. It also creates criminal offences for unauthorised works to, or damage of, these monuments.

**9.7 Planning (Listed Buildings & Conservation Areas) Act 1990<sup>300</sup>:** An Act of Parliament that changed the laws for granting of planning permission for building works, with a particular focus on listed buildings and conservation areas.

**9.8 The Government’s Statement on the Historic Environment for England 2010<sup>301</sup>:** Sets out the Government’s vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life. Includes reference to promoting the role of the historic environment within the Government’s response to climate change and the wider sustainable development agenda.

**9.9 The Heritage Statement 2017<sup>302</sup>:** Sets out how the Government will support the heritage sector and help it to protect and care for our heritage and historic environment, in order to maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

**9.10 Sustainability Appraisal and Strategic Environmental Assessment Historic England Advice Note 8<sup>303</sup>:** Sets out

Historic England’s guidance and expectations for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.

## Current baseline

### Heritage assets

**9.11** The Districts have a range of unique historic assets, which give the Districts character and beauty<sup>304</sup>. These assets include Scheduled Monuments, Registered Parks and Gardens and a range of Listed Buildings (Grades I, II and II\*), as shown in **Figure B.18** and **Figure B.19**. A number of non-designated heritage assets are also located across both Districts.

**9.12** In Babergh District, there are 35 Scheduled Monuments, six Registered Parks and Gardens<sup>305</sup>, 89 Grade I Listed Buildings, 2,730 Grade II Listed Buildings and 185 Grade II\* Listed Buildings.

**9.13** In Mid Suffolk there are 39 Scheduled Monuments, three Registered Parks and Gardens<sup>306</sup>, 177 Grade I Listed Buildings, 5,919 Grade II Listed Buildings and 372 Grade II\* Listed Buildings.

**9.14** A Conservation Area is defined as “an area of special architectural or historic interest, the character of which it is desirable to preserve or enhance”<sup>307</sup>. It usually consists of a historic core with a number of Listed Buildings. There are 60 Conservation Areas altogether in both Districts. The Councils have produced Conservation Area Appraisals, which have been adopted by the Councils<sup>308</sup>.

**9.15** BMSDC’s Heritage and Settlement Sensitivity Assessment (2018)<sup>309</sup> provides details on the historic landscape of the Districts. The document assesses 42

<sup>299</sup> HM Government (1979). Ancient Monuments & Archaeological Areas Act. (see <https://consult.environment-agency.gov.uk/engagement/bostonbarriertwao/results/b.21---ancient-monuments-and-archaeological-areas-act-1979.pdf>)

<sup>300</sup> HM Government (2002). Planning (Listed Buildings & Conservation Areas) Act (1990). (see [http://www.legislation.gov.uk/ukpga/1990/9/pdfs/ukpga\\_19900009\\_en.pdf](http://www.legislation.gov.uk/ukpga/1990/9/pdfs/ukpga_19900009_en.pdf))

<sup>301</sup> HM Government (2010). The Government’s Statement on the Historic Environment for England 2010. (see <https://www.gov.uk/government/publications/the-governments-statement-on-the-historic-environment-for-england>)

<sup>302</sup> Department for Digital, Culture Media and Sport (2017). Heritage Statement 2017. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/664657/Heritage\\_Statement\\_2017\\_final\\_-\\_web\\_version\\_.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/664657/Heritage_Statement_2017_final_-_web_version_.pdf))

<sup>303</sup> Historic England (2016). Sustainability Appraisal and Strategic Environmental Assessment: Historic England Advice Note 8. (see [<books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/hea036-sustainability-appraisal-strategic-environmental-assessment.pdf/>\)](https://content.historicengland.org.uk/images-</a></p>
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<sup>304</sup> BMSDC (2020). Heritage. (see <https://www.midsuffolk.gov.uk/planning/heritage/>)

<sup>305</sup> BMSDC (2021-22). Annual Monitoring Report. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/AMR/Babergh-and-Mid-Suffolk-AMR-2021-2022.pdf>)

<sup>306</sup> BMSDC (2021-22). Annual Monitoring Report. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/AMR/Babergh-and-Mid-Suffolk-AMR-2021-2022.pdf>)

<sup>307</sup> BMSDC (2020). Living in a Conservation Area. (see <https://www.midsuffolk.gov.uk/planning/heritage/living-in-a-conservation-area/>)

<sup>308</sup> BMSDC (2020). Heritage. (see <https://www.midsuffolk.gov.uk/planning/heritage/conservation-area-appraisals/>)

<sup>309</sup> BMSDC (2018). Heritage and Settlement Sensitivity Assessment. (<https://www.babergh.gov.uk/planning/planning-policy/evidence->

settlements which have been identified as potential areas of residential expansion. Eight of these settlements are identified as being of cumulatively high value, specifically: Boxford, Debenham, East Bergholt, Eye, Hoxne, Lavenham, Long Melford and Nayland. The JLP Historic Environment Appraisals (2020)<sup>310</sup> provides a more detailed analysis of the potential impact on individual assets of developing the sites that were at that time preferred for inclusion in the JLP.

### Heritage assets at risk

**9.16** Historic England has a Heritage at Risk Register<sup>311</sup> which includes historic buildings, sites and conservation areas at risk of being lost through neglect, deterioration or decay<sup>312</sup>. The Register aims to highlight those places and buildings in greatest need of repair.

**9.17** In Babergh, there are two Grade I Listed Buildings that are at risk:

- **Barn north east of Bentley Hall, Bentley Hall Road, Bentley:** very bad condition.
- **Church of St Mary, Church Lane, Stoke-by-Nayland :** poor condition.

**9.18** There are also three Scheduled Monuments in the District that are at risk:

- **Roman villa north east of Rodbridge House, Long Melford:** extensive significant problems.
- **Wissington ring ditch cluster. Nayland-with-Wissington:** extensive significant problems.
- **Wood Hall moated site, Sudbury:** generally unsatisfactory with major localised problems.

**9.19** In Mid Suffolk, there are three Grade I Listed Buildings and thirteen Grade II\* Listed Buildings that are at risk:

- **Church of St Mary, Hall Lane, Nettlestead (Grade I):** poor condition.
- **Church of St Margaret, Little Green, Thrandeston (Grade I):** poor condition.
- **Church of St Mary, Church Lane, Yaxley (Grade I):** very bad condition.
- **Terrace Known as the Balcony Garden, including Balustrading and Pavilion, Barham (Grade II\*):** poor condition.

- **31-37, High Street, Debenham (Grade II\*):** very bad condition.
- **Badley Hall barn 100 metres south east of Badley Hall, Badley (Grade II\*):** poor condition.
- **Badley Hall dovecote 60 metres east of Badley Hall, Badley (Grade II\*):** poor condition.
- **Grand Stairs and Grotto, 50 meters west of Shrubland Hall, Barham (Grade II\*):** poor condition.
- **Shrubland Hall, including attached Screen Walling on east side and Terraces and Balustrading on south and west sides, Barham (Grade II\*):** poor condition.
- **Upper Gun Terrace, 10 meters west of Shrubland Hall, Barham (Grade II\*):** poor condition.
- **Poplar Farmhouse, Brome and Oakley (Grade II\*):** very bad condition.
- **Grand Stairs and Grotto 50 metres west of Shrubland Hall, Coddtenham (Grade II\*):** poor condition.
- **Lower Loggia and attached Balustrading and steps 150 meters west of Shrubland Hall, Coddtenham (Grade II\*):** poor condition.
- **Barn 200 metres west of Hall's Farmhouse, Halls Lane, Norton (Grade II\*):** poor condition.
- **Church of St Andrew, Church Road, Redlingfield (Grade II\*):** poor condition.
- **Church of All Saints, Church Street, Stadbroke (Grade II\*):** very bad condition.

**9.20** Furthermore, there are two Scheduled Monuments in the District that are at risk:

- **Barn at Rook Hall, Eye:** very bad condition.
- **Baylham Roman site, Coddtenham:** extensive significant problems.

**9.21** Finally, there is a Registered Park and Garden (Grade I Listed Shrubland Hall, Hemingstone / Barham / Coddtenham) containing 29 Listed Buildings that partially falls within a Conservation Area. It is generally unsatisfactory with major localised problems.

**9.22** The heritage assets at risk are shown in **Figure 9.3**

[base/current-evidence/bmsdc-heritage-and-settlement-sensitivity-assessment/](https://www.midsuffolk.gov.uk/documents/d/asset-library-54706/bmsdc-hia-stage-2-report)

<sup>310</sup> LUC (2020) JLP Historic Environment Appraisals Stage 2: Heritage Impact Assessments for Preferred Sites (see <https://www.midsuffolk.gov.uk/documents/d/asset-library-54706/bmsdc-hia-stage-2-report>)

<sup>311</sup> Historic England (2024). East of England Register 2023. (see <https://historicengland.org.uk/images-books/publications/har-2023-registers/ee-har-register2023/>)

<sup>312</sup> Ibid



## Future baseline and likely evolution without the Part 2 Joint Local Plan

**9.23** The historic environment is considered a finite resource. It cannot be replaced and is susceptible to decline over time as historic features experience degradation and decay. However, cultural heritage as a whole can evolve and change, and features which are not currently considered a valued part of the historic environment may become so in the future, either due to their uniqueness, past use, or historic or cultural significance.

**9.24** The Districts have a range of unique historic assets, including scheduled monuments, registered parks and gardens and a range of listed buildings (grades I, II and II\*), as well as non-designated heritage assets are also located. Some of the heritage assets located in both Districts are identified as being in poor condition, and at risk.

**9.25** New development and infrastructure and environmental pressures, such as extreme weather and flooding, present the

greatest risk to cultural heritage assets in Babergh and Mid Suffolk Districts. The requirement for development and infrastructure and the likelihood for many environmental pressures are likely to continue regardless of whether or not the Part 2 JLP progresses. The planning and listed buildings consent regime set out through national legislation will help to limit particularly adverse effects in relation to development that might otherwise affect heritage assets. However, without the Part 2 JLP development is more likely to come forward at locations of increased sensitivity for the historic environment.

## Key sustainability issues

**9.26** The key sustainability issues for historic environment, and the opportunities for the Joint Local Plan Part 2 to address them are shown in **Table 9.1**.

**Table 9.1: Key sustainability issues and opportunities for the Joint Local Plan Part 2 to address them**

| Key sustainability issues for Babergh and Mid Suffolk  | Opportunities for the Joint Local Plan Part 2 to address the key sustainability issues   | Relevant SA objectives |
|--|--|------------------------|
| There are many sites, features and areas of historical and cultural interest in the Plan area, a number of which are identified on the Heritage at Risk register. In the context of significant ongoing pressures for development locally, these assets, and their landscape setting, may be at risk from adverse effects from poorly located or designed development. | The JLP Part 2 offers an opportunity to limit development in more historically sensitive areas by updating the settlement hierarchy, carefully distributing housing allocations, and designating specific sites for development. This will ensure that development does not result in adverse effects on the historic environment. | SA objective 12.       |



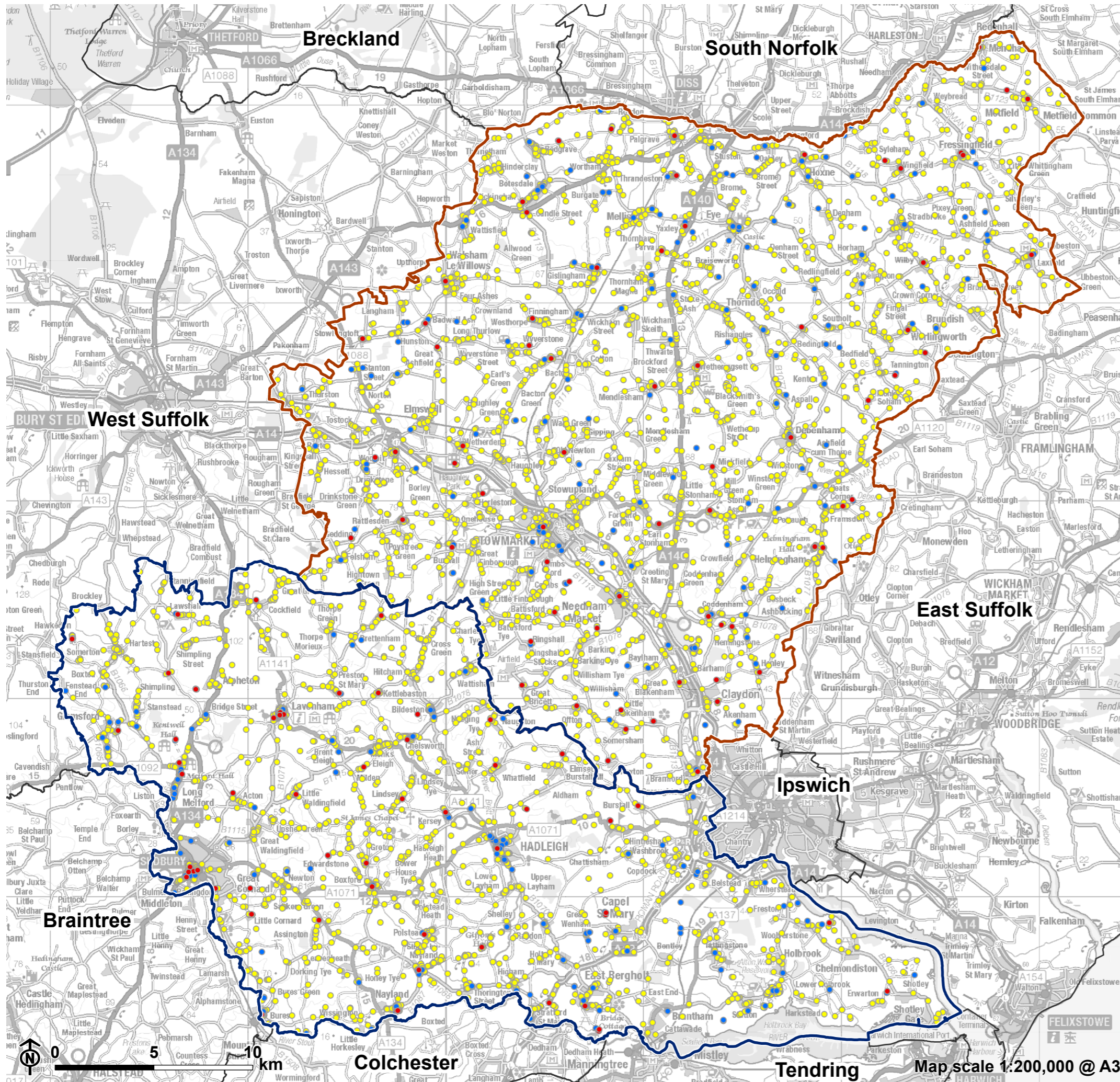
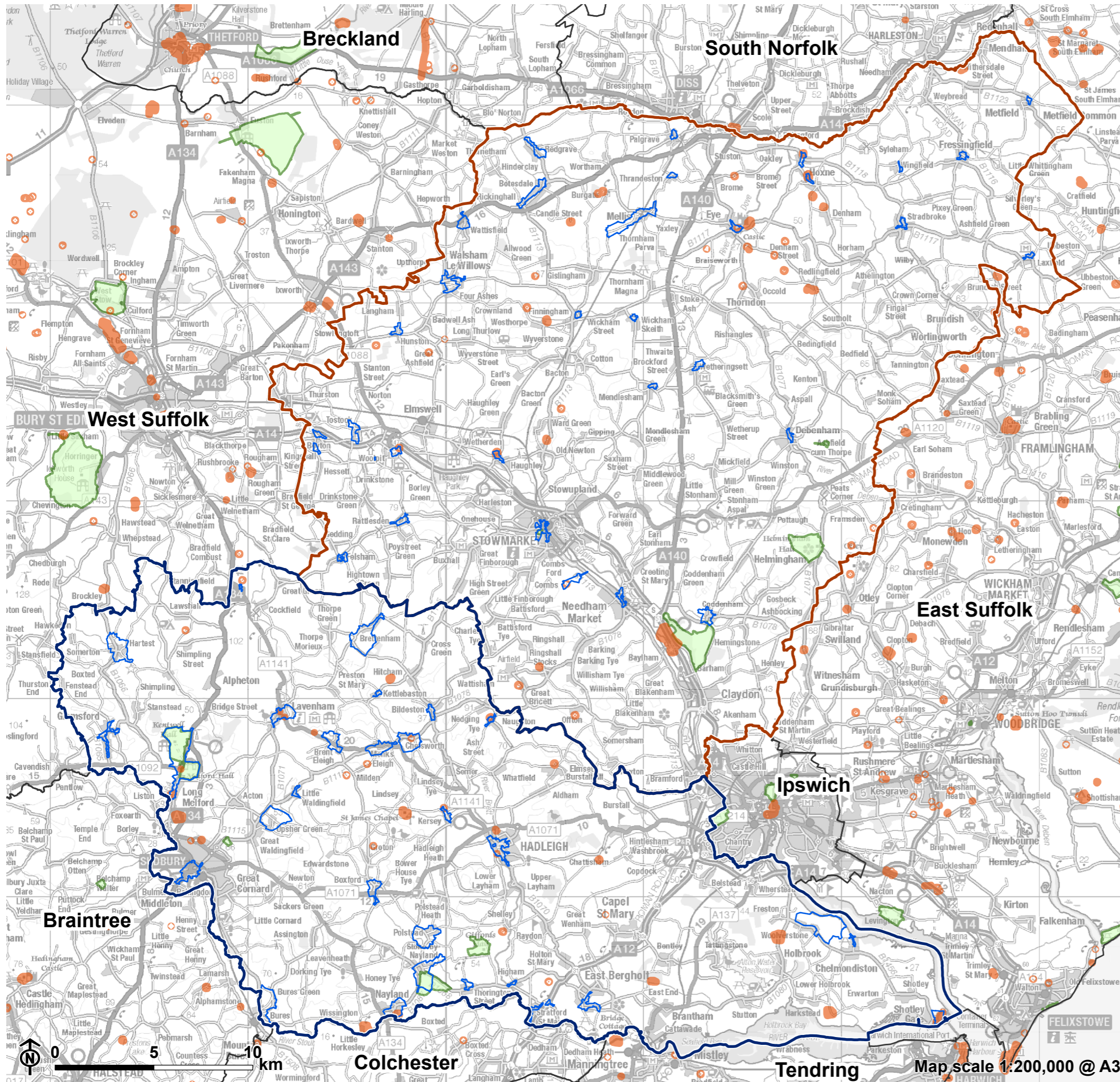


Figure 9.1: Listed buildings

- Mid Suffolk District
- Babergh District
- Neighbouring local authority
- Listed Building
  - Grade I
  - Grade II\*
  - Grade II



Figure 9.2: Heritage assets

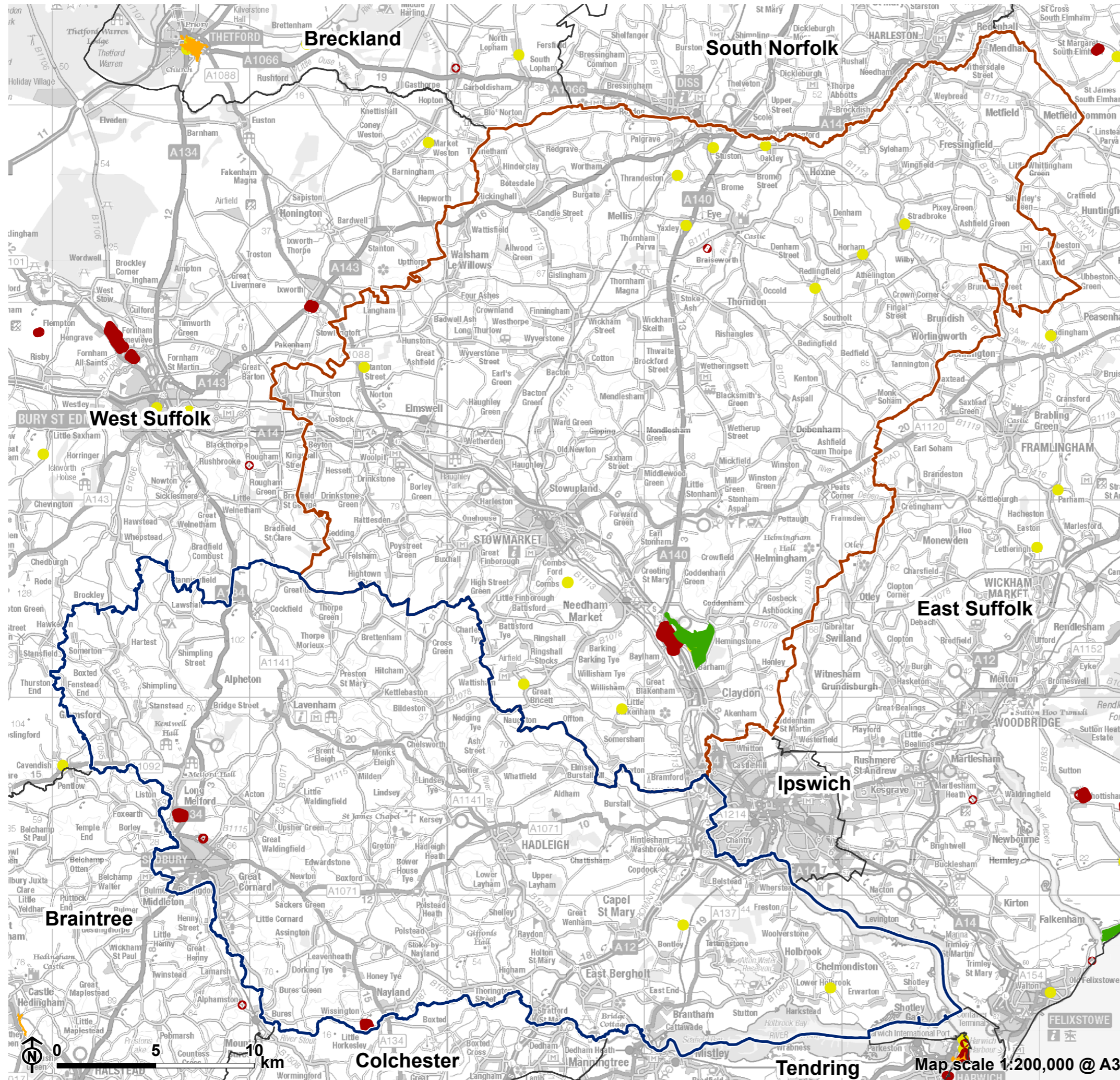


- Mid Suffolk District
- Babergh District
- Neighbouring local authority
- Conservation Area
- Scheduled Monument
- Registered Parks and Gardens





Figure 9.3: Heritage assets at risk



- Mid Suffolk District
- Babergh District
- Neighbouring local authority
- Heritage at risk**
- Conservation Area
- Listed Building
- Registered Park and Garden
- Scheduled Monument



# Chapter 10

## Landscape

### Policy Context

#### National

**10.1** The **NPPF (2023)**<sup>313</sup> includes as part of its approach to protecting the natural environment, recognition for the intrinsic character and beauty of the countryside, and the wider benefits to be secured from natural capital. Importantly, great weight is to be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty (AONB) (please note that from November 2023 AONBs were retitled National Landscapes).

**10.2** As part of the approach to achieving well-designed places the NPPF states that planning policies and decisions should ensure that developments “*are sympathetic to local character and history, including the surrounding built environment and landscape setting.*”

**10.3** The NPPF is supported by planning practice guidance relating to:

- **Natural environment (2019)**<sup>314</sup> highlights key issues in implementing policy to protect and enhance the natural environment, agricultural land, soils and brownfield land of environmental value, green infrastructure, biodiversity, geodiversity, ecosystems and landscapes.
- **Green Belt (2019)**<sup>315</sup> provides advice on the role of the Green Belt in the planning system, removal of land from the Green Belt and compensatory improvements.

**10.4 National Planning Practice Guidance**<sup>316</sup>: Updated in 2019 to provide information on how development within the setting of National Parks, the Broads and Areas of Outstanding Natural Beauty should be dealt with. According to the guidance, land within the setting of these areas often makes an important contribution to maintaining their natural beauty. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account.

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<sup>313</sup> Department for Levelling Up, Housing and Communities (2023). National Planning Policy Framework. (see [https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF\\_December\\_2023.pdf](https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf))

<sup>314</sup> Ministry of Housing, Communities and Local Government (2019). Natural Environment. (see <https://www.gov.uk/guidance/natural-environment>)

<sup>315</sup> Ministry of Housing, Communities and Local Government (2019). Green Belt. (see <https://www.gov.uk/guidance/green-belt>)

<sup>316</sup> Ministry of Housing, Communities & Local Government (last updated 1 October 2019). Planning Practice Guidance. (see <https://www.gov.uk/government/collections/planning-practice-guidance>)

**10.5 The Environment Act 2021**<sup>317</sup> sets out the UK's new framework for environmental protection. It includes the creation of Conservation Covenant agreements between a landowner and a responsible body for the purposes of conservation of the natural environment of the land or its natural resources, or to conserve the place or setting of the land for its 'archaeological, architectural, artistic, cultural or historic interest.'

**10.6 Environmental Improvement Plan 2023**<sup>318</sup>: The Environmental Improvement Plan 2023 for England is the first revision of the 25 Year Environment Plan. It builds on the vision of 25 Year Environment Plan with a new plan setting out how Defra will work with landowners, communities and businesses to deliver each of its goals for improving the environment, matched with interim targets to measure progress. Under the plan the Government will protect 30% of England's land and sea for nature. The Environmental Improvement Plan 2023 sets out the goal of enhancing beauty, heritage and engagement with the natural environment. This goal is considered of more relevance to the theme of the conservation and enhancement of landscapes. The goal is elaborated upon in the Environmental Improvement Plan as follows:

- Enhancing beauty, heritage and engagement with the natural environment:
  - We will conserve and enhance the beauty of our natural environment, and make sure it can be enjoyed, used by and cared for by everyone.

**10.7 Countryside and Rights of Way Act 2000**<sup>319</sup>: An Act of Parliament to create a new statutory right of access on foot to certain types of open land, to modernise the public rights of way system, to strengthen nature conservation legislation, and to facilitate better management of National Landscape (previously known as Areas of Outstanding Natural Beauty).

**10.8 National Parks and Access to the Countryside Act 1949**<sup>320</sup>: An Act of Parliament to make provision for National Parks and the establishment of a National Parks Commission; to confer on the Nature Conservancy and local authorities'

powers for the establishment and maintenance of nature reserves; to make further provision for the recording, creation, maintenance and improvement of public paths and for securing access to open country.

### Sub-national

**10.9 Joint Babergh & Mid Suffolk Landscape Character Guidance (2015)**<sup>321</sup>: Provides guidance to outline the main elements of the existing character, as well as the broad principles that all development in the countryside will have to follow. The guidance aims to help retain and enhance valuable landscape characteristics that are important to Babergh and Mid Suffolk, while also encouraging developments in appropriate locations with good design leading to sustainable economic benefits.

**10.10 Dedham Vale AONB Management Plan 2021-26**<sup>322</sup>: The plan sets out the management objectives for the area which have been agreed with the relevant Local Authorities and organisations involved with the project's partnership. It aims to conserve and enhance natural beauty with secondary purposes to meet the needs of recreation, safeguarding agriculture, forestry and other rural industries.

**10.11 Suffolk Coast & Heaths AONB Management Plan 2018-2023**<sup>323</sup>: The management plan has five objectives that focus on different topics such as landscape, coast and estuaries, land use and wildlife, enjoying the area and working together. It sets out a vision for the area and aims to conserve and enhance the area.

**10.12 The Value Landscape Assessment of the Stour Valley Additional Project Area (APA) (2020)**<sup>324</sup> associated with the Dedham Vale and the Suffolk Coast and Heaths National Landscape, which lies beyond these designation boundaries, states that the Stour Valley Project Area shares similar characteristics to the Dedham Vale National Landscape. The special qualities of the National Landscape are set out in the AONB Management Plan as follows<sup>325</sup>:

<sup>317</sup> HM Government (2021) Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

<sup>318</sup> HM Government (2023). Environmental Improvement Plan 2023. (see <https://www.gov.uk/government/publications/environmental-improvement-plan>)

<sup>319</sup> HM Government (2000). Countryside and Rights of Way Act 2000. (see <https://www.legislation.gov.uk/ukpga/2000/37/section/85>)

<sup>320</sup> HM Government (1949). National Parks and Access to the Countryside Act 1949. (see <https://www.legislation.gov.uk/ukpga/Geo6/12-13-14/97>)

<sup>321</sup> BMSDC (2015). Landscape Guidance. (see <https://www.babergh.gov.uk/assets/DM-Planning-Uploads/Joint-Landscape-Guidance-Aug-2015.pdf>)

<sup>322</sup> Dedham Vale Area of Outstanding Natural Beauty (AONB) and Stour Valley Project Area Management Plan 2021-26. (see

<https://www.dedhamvalestourvalley.org/wp-content/uploads/2021/12/2021-Management-Plan-Final-Single-Page.pdf>)

<sup>323</sup> Suffolk Coast & Heaths Area of Outstanding Natural Beauty (2018). Suffolk Coast & Heaths Area of Outstanding Natural Beauty Management Plan (2018-2023). (see <http://www.suffolkcoastandheaths.org/assets/About-Us/Man-Plan-Docs/2018-2023/2018-23-SCH-Management-Plan.pdf>)

<sup>324</sup> Suffolk Coast & Heaths Additional Project Area (2020). Valued Landscape Assessment: Stour Valley Project Area, Final Report.

<sup>325</sup> Dedham Vale Area of Outstanding Natural Beauty (AONB) and Stour Valley (2016). Dedham Vale Area of Outstanding Natural Beauty (AONB) and Stour Valley Management Plan 2016-2021. (see <http://www.dedhamvalestourvalley.org/assets/About-Us/Man-Plan-consultation/AONB-Management-Plan-web.pdf>)



- Iconic lowland river valley associated with the artist John Constable RA, the views he painted are still recognisable today.
- Historic villages with timber framed housing and prominent churches.
- Valley bottom grazing marshes with associated drainage ditches and wildlife.
- Naturally functioning River Stour with associated tributaries, meres and historic river management features.
- Semi natural ancient woodlands on valley sides and associated wildlife.
- Traditional field boundaries intact and well managed.
- Apparent and buried archaeology indicating millennia of human occupation.
- A sense of relative tranquillity.
- Surprisingly, long distance views from higher ground along the valley in an area associated with large skies.

**10.13** In addition, the Report describes the APA as predominantly rural with medieval settlement patterns, and although the landscape has been altered by agricultural practices and the growth of settlements, it is fundamentally unchanged. Isolated farm buildings and hamlets are scattered throughout the landscape. The historic centres of many of the villages and towns within the assessment area have retained their special character with timber framed buildings, imposing churches and village greens<sup>326</sup>.

**10.14 The Value Landscape Assessment of the Suffolk Coast & Heaths APA (2020)**<sup>327</sup> associated with the Dedham Vale and the Suffolk Coast and Heaths National Landscapes, states that the Shotley Peninsula area of the APA was specifically picked out as a key landscape attribute of National Character Area 82: Suffolk Coast and Heaths. The area's generally less impoverished soils were considered to be the best in Suffolk and they have had a significant impact on the landscape, evidenced by historic farms and settlements.

## Current baseline

**10.15** Babergh and Mid Suffolk covers a total area of approximately 565 square miles. In Babergh there are two

main towns and the landscape is varied consisting mainly of undulating arable farmland with river valleys. The Orwell and Stour estuaries are found on the eastern and south-eastern sides of the District which have valued wildlife habitats and a distinct character.

**10.16** Mid Suffolk is made up of a combination of market towns, villages and countryside. The north of the District contains the valleys of the River Waveney and Dove and the south includes open fields of High Suffolk to the Valleys of the River Ratt and Gipping in the south.

**10.17** In Babergh District, there are two National Landscapes (previously known as Areas of Outstanding Natural Beauty): Dedham Vale and Suffolk Coast & Heaths, located in the south and south-east of the District, respectively, as shown in **Figure B.21**. In July 2020, the Secretary of State confirmed Natural England's legal Order to designate three extensions to the Suffolk Coast and Heaths National Landscapes. The three new boundary extensions increase the size of the existing National Landscape by approximately 38km<sup>2</sup> (an increase of approximately 9.5%). The areas now confirmed as forming part of the Suffolk Coast and Heaths National Landscape are:

- The Stour Estuary including the estuary itself, the northern estuary slopes at Brantham and the majority of the southern estuary valley slopes in Essex.
- The Freston Brook Valley, a tributary of the Orwell Estuary which extends inland from the existing National Landscape boundary westwards and includes surrounding plateau woodlands.
- The Samford Valley, a tributary of the Stour Estuary, which extends further inland from the existing National Landscape boundary at Stutton Bridge and includes some areas of neighbouring Shotley Peninsula Plateau.

**10.18** National Character Area (NCA) profiles created by Natural England are used to define the specific combination of landscape, geodiversity, biodiversity, history, culture and economic activity in an area. NCAs follow natural lines in the landscape instead of administrative boundaries<sup>328</sup>. The National Character Areas are shown in **Figure B.22**.

**10.19** Babergh runs through the NCAs Suffolk Coast and Heaths (82) and South Suffolk and North Essex Clayland (86)<sup>329</sup>. Mid Suffolk runs through the NCAs South Norfolk and

<sup>326</sup> Dedham Vale Area of Outstanding Natural Beauty (AONB) and Stour Valley (2016). Dedham Vale Area of Outstanding Natural Beauty (AONB) and Stour Valley Management Plan 2016-2021. (see <http://www.dedhamvalestourvalley.org/assets/About-Us/Man-Plan-consultation/AONB-Management-Plan-web.pdf>)

<sup>327</sup> Suffolk Coastal District Council (2020). Value Landscape Assessment: Suffolk Coast & Heaths Additional Project Area, Final Report

<sup>328</sup> HM Government (2014). National Character Areas. (see <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>)

<sup>329</sup> HM Government (2014). National Character Area. (see <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles>)

High Suffolk Claylands (83) and South Suffolk and North Essex Clayland (86).

**10.20** Suffolk Coast and Heaths (82) is found in the south-east of Babergh District covering Shotley Gate, Pin Mill and Holbrook. This NCA is one of the driest parts of the country, with local rainfall typically only two thirds of the national average. The underlying geology shaped by the effects of the sea and interactions of people have created the distinctive landscape character. The majority of the NCA is flat or gently rolling and often open with a few viewpoints. Wildlife habitats and landscape features are found in close proximity in many places, especially near the coast, which provide great diversity in a small area. This NCA also contains part of Dedham Vale National Landscape.

**10.21** South Norfolk and High Suffolk Claylands (83) is found in the north of Mid Suffolk District. The High Suffolk Claylands is a high predominately flat clay plateau which dominates the area of the NCA and is dissected by a small number of small-scale wooded river valleys with complex slopes. The underlying geology is chalk and this the principal aquifer. Shallow marine deposits are overlain with glacial till, buried river gravels, lake sediments and finally bands of glacial outwash deposits.

**10.22** South Suffolk and North Essex Clayland (86) is found in the north, north-west and south of Babergh District. The landscape is ancient with wooded arable countryside and a distinct sense of closure. The NCA is mainly gently undulating with chalky boulder clay plateau. The undulations are caused by numerous small-scale river valleys that cut through the plateau. Old species-rich hedgerows, ancient woodlands, parklands and meadows with streams and rivers flow eastwards. Despite field enlargements in the second half of the 20th century, there are still traditional irregular field patterns over much of the area. The moderately fertile soils are chalky clay and give the vegetation a more or less calcareous character. In addition, there are gravel and sand deposits under the clay which is an important geological feature that is often exposed during mineral extraction.

**10.23** The NCA profiles indicate the drivers for change as well as the opportunities for environmental improvement. Typical drivers of change include development pressure, noise and light pollution, recreational pressure, changes in farming practices and intensive agriculture, mineral extraction, declines in biodiversity, loss or neglect of historic features, pressure on the water environment, and climate change.

**10.24** The Suffolk Coast and Heaths APA shares similar characteristics to the Suffolk Coasts and Heaths National Landscape, the special qualities of which are set out in the publication on Natural Beauty and Special Quality Indicators<sup>330</sup>, and summarised below:

- Repetitive pattern of east west estuaries penetrating the coastal farmlands and heaths.
- Close knit interrelationship of semi-natural and cultural landscapes and built heritage features creating attractive compositions.
- Important areas of heath and acid grassland and coastal habitats highly valued for biodiversity.
- Enigmatic built structures and features including Sizewell and Orford Ness which sit within an open large-scale coastal setting.
- Sea cliffs and shingle beaches contrast with gently rolling sandland heaths and farmland.
- Long distant and panoramic views and large skies.
- Villages and small towns which high concentration of built heritage assets and local vernacular connected by network of hedged rural lanes.
- Designed parkland landscapes overlooking estuaries and high concentration of veteran trees.
- Associations with writers and poets.
- A sense of relative tranquillity.

## Future baseline and likely evolution without the Part 2 Joint Local Plan

**10.25** Babergh and Mid Suffolk Districts are predominately rural in character. In Babergh District, there are two National Landscapes. Further to this, Babergh runs through the NCAs Suffolk Coast and Heaths (82) and South Suffolk and North Essex Clayland (86)<sup>331</sup>. Mid Suffolk runs through the NCAs South Norfolk and High Suffolk Claylands (83) and South Suffolk and North Essex Clayland (86).

**10.26** The National Character Area (NCA) profiles, as developed by Natural England, will help to limit particularly adverse effects in relation to development that might otherwise significantly harm the landscape character areas. However, without the Local Plan development is more likely to

<sup>330</sup> LDA Design (Nov 2016). Suffolk Coast & Heaths Area of Outstanding Natural Beauty, Natural Beauty and Special Qualities Indicators. (see <https://www.eastsuffolk.gov.uk/assets/Planning/Adastral-Park/Environmental-Statement-Volume-2b-appendices/Appendix-H6->

[Suffolk-Coast-and-Heaths-AONB-Natural-Beauty-and-Special-Qualities-Indicators-November-2016.pdf](https://www.eastsuffolk.gov.uk/assets/Planning/Adastral-Park/Environmental-Statement-Volume-2b-appendices/Appendix-H6-))

<sup>331</sup> HM Government (2014). National Character Area. (see <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles>)

come forward at locations of increased sensitivity for the landscapes of both Districts.

### Key sustainability issues

**10.27** The key sustainability issues for landscape, and the opportunities for the Joint Local Plan Part 2 to address them are shown in **Table 10.1**.

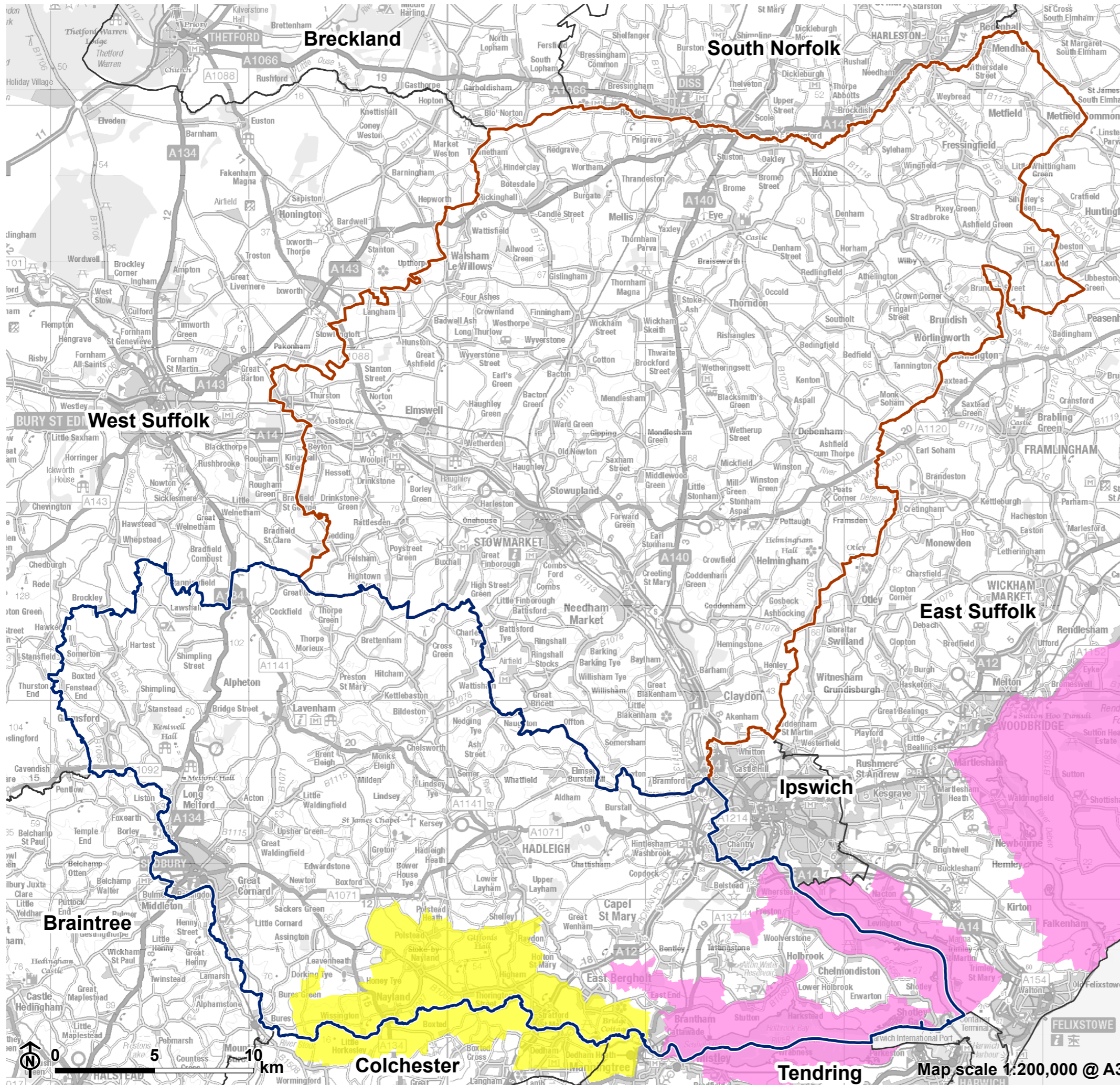
**Table 10.1: Key sustainability issues and opportunities for the Joint Local Plan Part 2 to address them**

| Key sustainability issues for Babergh and Mid Suffolk   | Opportunities for the Joint Local Plan Part 2 to address the key sustainability issues  | Relevant SA objectives  |
|---|---|-------------------------|
| <p>The plan area contains two National Landscapes and a diverse range of nationally recognised landscape character areas, all of which could be significantly harmed by inappropriate development. As well as loss of undeveloped land to development, indirect effects of development can also erode landscape character, such as noise and light pollution, recreational pressure, changes to the water environment, and pressure on habitats and biodiversity and the historic environment that contribute to landscape character.</p> | <p>The JLP Part 2 provides an opportunity to safeguard the integrity of the National Landscapes through careful site allocations and an up-to-date settlement boundaries as clear settlement boundaries will help prevent urban sprawl into rural areas, thereby preserving the character of the landscape.</p> | <p>SA objective 13.</p> |





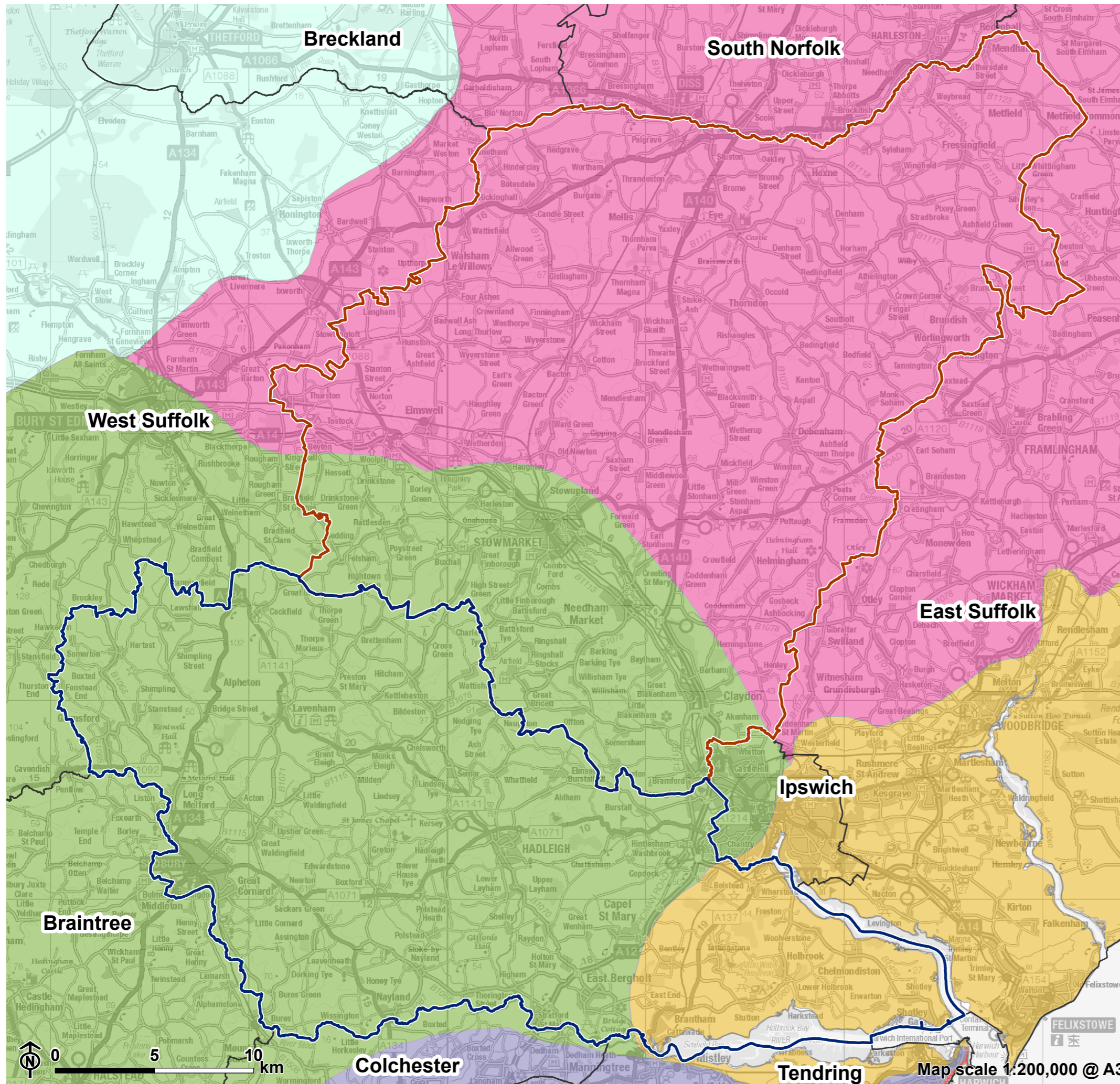
Figure 10.1: National Landscapes



- Mid Suffolk District
- Babergh District
- Neighbouring local authority
- National Landscape**
- Dedham Vale
- Suffolk Coast & Heaths



Figure 10.2: National Character Areas



- Mid Suffolk District
- Babergh District
- Neighbouring local authority
- National Character Area**
- Greater Thames Estuary
- Northern Thames Basin
- South Norfolk and High Suffolk Claylands
- South Suffolk and North Essex Clayland
- Suffolk Coast and Heaths
- The Brecks



# Chapter 11

## The SA framework and method of approach

### SA framework

**11.1** The development of a set of SA objectives (known as the SA framework) is a recognised way in which the likely environmental and sustainability effects of a plan can be described, analysed and compared.

**11.2** The SA framework for the Babergh and Mid Suffolk Part 2 JLP is presented in **Table 11.1**. The SA framework that was used during the SA of the Part 1 JLP is proposed to be used for the SA of the Part 2 JLP as well as it is still considered to be fit for purpose. The SA framework comprises a series of SA objectives, each accompanied by a set of guide questions that will be used to appraise the performance of the new Part 2 JLP against the SA objectives, including alternative overall spatial strategies for growth being considered by the two Councils for inclusion in the Part 2 JLP.

**11.3** The relationship between the key sustainability issues and the SA objectives is described in the tables at the end of each of the SA topics in **Chapters 3 to 10** of this SA Scoping Report.

**11.4** The relationship between the 'SEA topics', which are the specific topics that SEA is required to cover, as per Schedule 2 of the SEA Regulations, is shown in the final column of **Table 11.1**. It can be seen that a number of the SA objectives cut across SEA Topics, showing how inter-related many of these are.

### Site assessment criteria and assumptions

**11.5 Appendix A** contains the site assessment criteria and assumptions developed from the SA framework. These criteria are largely the same as those that were used to appraise the site options being considered for allocation in the Joint Local Plan before it was decided that the Plan would be set out in two parts, with no site allocations being made in Part 1. However, some amendments have since been made to reflect the data currently available and to streamline the appraisal process, ensuring easy analysis of spatial data using Geographical Information Systems (GIS).

**11.6** The site assessment criteria and assumptions will be used to establish the potential effects generated by development in site options and allocations identified for consideration by BMSDC. The performance of the sites against the site assessment criteria and assumptions will be



used, alongside other technical assessments, to inform BMSDC's selection of individual site allocations.

**11.7** The SA framework and site assessment criteria and assumptions are subject to change following feedback collated during consultation on this SA Scoping Report with the three statutory consultation bodies (Environment Agency, Historic England and Natural England) under Regulation 12(5) of the SEA Regulations.

Table 11.1 SA framework for the Part 2 Joint Local Plan

| SA Objective  | Guide Questions   | Relevant SEA Topics  |
|---|---|--|
| <p>1. To improve the health and wellbeing of the population overall and reduce health inequalities.</p> | <p>(1.1) Will it improve access to health facilities and social care services?<br/>                     (1.2) Will it encourage healthy lifestyles?<br/>                     (1.3) Will it support special needs and an ageing population?<br/>                     (1.4) Will it increase access to open countryside?<br/>                     (1.5) Will it increase access to public open space?<br/>                     (1.6) Will it improve access to cultural facilities?<br/>                     (1.7) Will it improve access to community facilities?<br/>                     (1.8) Will it reduce crime and anti-social activity?<br/>                     (1.9) Will it reduce noise and odour concerns?<br/>                     (1.10) Does the proposal explore opportunities for shared community use and co-location of services?<br/>                     (1.11) Does the proposal retain and enhance existing open and natural spaces?<br/>                     (1.12) Does the proposal provide a range of play spaces for children and young people?</p> | <p>Population<br/>                     Human Health<br/>                     Material Assets</p> |
| <p>2. To maintain and improve levels of education and skills in the population overall.</p>             | <p>(2.1) Will it improve qualifications and skills of young people and adults?<br/>                     (2.2) Will it support the provision of an adequate range of educational and childcare facilities? / Does the proposal provide childcare facilities?<br/>                     (2.3) Does the proposal contribute to meeting primary, secondary and post 19 education needs?</p>  | <p>Population<br/>                     Human Health<br/>                     Material Assets</p> |
| <p>3. To reduce poverty and social exclusion and ensure access to jobs and services.</p>                | <p>(3.1) Will it reduce poverty and social exclusion in those areas most affected?<br/>                     (3.2) Will it maintain and improve access to key services and facilities for all sectors of the population? / Does the proposal retain or re-provide existing social infrastructure?<br/>                     (3.3) Will it reduce unemployment overall?<br/>                     (3.4) Does the proposal include a mix of uses and a range of community facilities?<br/>                     (3.5) Does the proposal include Lifetime Homes?</p>   | <p>Population<br/>                     Human Health</p>  |

| SA Objective   | Guide Questions   | Relevant SEA Topics  |
|--|---|--|
| <p>4. To meet the housing requirements of the whole community.</p>                       | <p>(4.1) Will it meet the housing requirements of the whole community?<br/>                     (4.2) Will it reduce homelessness?<br/>                     (4.3) Will it contribute to meeting demand for a range and mix of housing including affordable housing and specialist housing?<br/>                     (4.4) Will it reduce the number of unfit homes?<br/>                     (4.5) Does the proposal include homes that can be adapted to support independent living for older and disabled people?<br/>                     (4.6) Does the proposal address the housing needs of older people, i.e. extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes?</p>   | <p>Population<br/>                     Human Health<br/>                     Material Assets</p>             |
| <p>5. To conserve and enhance water quality and resources.</p>                           | <p>(5.1) Will it protect and enhance water resources?<br/>                     (5.2) Will it support the achievement of Water Framework Directive targets?<br/>                     (5.3) Will it protect and improve the quality of inland waters?<br/>                     (5.4) Will it protect and improve the quality of coastal waters?<br/>                     (5.5) Will it promote sustainable use of water?<br/>                     (5.6) Will it maintain water availability or water dependent habitats?<br/>                     (5.7) Will it support the provision of sufficient water supply and treatment infrastructure?<br/>                     (5.8) Does the proposal incorporate sustainable design and construction techniques?</p> | <p>Water<br/>                     Biodiversity, Fauna and Flora<br/>                     Material Assets</p> |
| <p>6. To maintain and where possible improve air quality and reduce noise pollution.</p> | <p>(6.1) Will it protect and improve air quality?<br/>                     (6.2) Does the proposal minimise noise pollution caused by traffic and commercial uses?<br/>                     (6.3) Will it avoid exacerbating existing air quality issues in designated AQMAs?<br/>                     (6.4) Does the proposal incorporate sustainable design and construction techniques?</p>  | <p>Air<br/>                     Human Health</p>   |
| <p>7. To conserve soil and mineral resources.</p>  | <p>7.1) Will it minimise the loss of open countryside to development?<br/>                     (7.2) Will it minimise loss of the best and most versatile agricultural land to development?</p>   | <p>Soil<br/>                     Material Assets</p>   |



| SA Objective  | Guide Questions   | Relevant SEA Topics   |
|---|---|---|
|   | (7.3) Does the proposal make best use of existing land?<br>(7.4) Will it maintain and enhance soil quality?<br>(7.5) Will it promote sustainable use of minerals?   |   |
| 8. To promote the sustainable management of waste.  | (8.1) Will it reduce household waste generated /head of population?<br>(8.2) Will it reduce commercial and industrial waste generated /head of population?<br>(8.3) Will it increase rate /head of population of waste reuse and recycling? / Does the proposal encourage recycling (including building materials)?<br>(8.4) Does the proposal incorporate sustainable design and construction techniques?  | Material Assets   |
| 9. To reduce contribution to climate change.  | (9.1) Will it reduce emissions of greenhouse gases /head of population by reducing energy consumption?<br>(9.2) Will it increase the proportion of energy needs being met by renewable sources?<br>(9.3) Does the proposal incorporate renewable energy?<br>(9.4) Does the proposal contain homes that are highly energy efficient?   | Climatic Factors  |
| 10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change. | (10.1) Will it minimise the risk of flooding to people and property from rivers and watercourses?<br>(10.2) Will it minimise the risk of flooding to people and property on the estuary?<br>(10.3) Will it reduce the risk of estuarine erosion?<br>(10.4) Will it reduce the risk of damage to people and property from extreme weather events?<br>(10.5) Does the proposal incorporate sustainable design and construction techniques?<br>(10.6) Does the proposal ensure that buildings and public spaces are designed to respond to winter and summer temperatures, i.e. ventilation, shading and landscaping?<br>(10.7) Does the proposal incorporate sustainable urban drainage techniques? | Water<br>Climatic Factors<br>Human Health<br>Biodiversity, Flora and Fauna<br>Material Assets |
| 11. To conserve and enhance biodiversity and geodiversity.  | (11.1) Will it maintain and enhance European designated nature conservation sites?<br>(11.2) Will it maintain and enhance nationally designated nature conservation sites?<br>(11.3) Will it maintain and enhance locally designated nature conservation sites?   | Biodiversity, Flora and Fauna   |

| SA Objective  | Guide Questions  | Relevant SEA Topics  |
|---|--|--|
|   | <p>(11.4) Will it avoid disturbance or damage to protected species and their habitats?</p> <p>(11.5) Will it help deliver the targets and actions for habitats and species within the Suffolk Biodiversity Action Plan?</p> <p>(11.6) Will it help to reverse the national decline in farmland birds?</p> <p>(11.7) Will it protect and enhance sites, features and areas of geological value in both urban and rural areas?</p> <p>(11.8) Will it lead to the creation of new habitat?</p> <p>(11.9) Does the proposal maintain or enhance biodiversity?</p>  |  |
| <p>12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.</p> | <p>(12.1) Will it protect and enhance buildings, monuments, sites, places, areas and landscapes of heritage interest or cultural value (including their setting) meriting consideration in planning decisions?</p> <p>(12.2) Will it protect and enhance sites, features and areas of archaeological value in both urban and rural areas?</p> <p>(12.3) Will it enhance accessibility to cultural heritage assets?</p>   | <p>Cultural Heritage, Architectural and Archaeological Heritage</p>                  |
| <p>13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.</p>                                | <p>(13.1) Will it conserve and enhance the National Landscapes?</p> <p>(13.2) Will it reduce the amount of derelict, degraded and underused land?</p> <p>(13.3) Will it protect and enhance the settlement and its setting within the landscape? / Will it protect and enhance landscape character?</p>  | <p>Landscape</p> <p>Cultural Heritage, Architectural and Archaeological Heritage</p> |
| <p>14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.</p>                                  | <p>(14.1) Will it improve business development and enhance competitiveness?</p> <p>(14.2) Will it improve the resilience of business and the economy?</p> <p>(14.3) Will it promote growth in key sectors?</p> <p>(14.4) Will it improve economic performance in disadvantaged areas?</p> <p>(14.5) Will it encourage rural diversification?</p> <p>(14.6) Will it encourage indigenous business?</p> <p>(14.7) Will it encourage inward investment?</p> <p>(14.8) Will it make land available for business development?</p> <p>(14.9) Is there a range of retail uses, including food stores and smaller affordable shops for social enterprises?</p> | <p>Population</p> <p>Human Health</p> <p>Material Assets</p>                         |

| SA Objective   | Guide Questions  | Relevant SEA Topics  |
|--|--|--|
|  | (14.10) Does the proposal include managed and affordable workspace for local businesses?   |  |
| 15. To revitalise the Districts' town centres.   | (15.1) Will it increase the range of employment opportunities, shops and services available in town?<br>(15.2) Will it decrease the number of vacant units in town centres?<br>(15.3) Will it enhance the viability and vitality of the Districts' centres?  | Population<br>Material Assets  |
| 16. To encourage efficient patterns of movement and the use of sustainable methods of travel in support of economic growth | (16.1) Will it reduce commuting?<br>(16.2) Will it improve accessibility to work by public transport, walking and cycling?<br>(16.3) Would it promote the use of sustainable travel modes and reduce dependence on the private car?<br>(16.4) Will it increase the proportion of freight transported by rail or other sustainable modes? | Population<br>Air<br>Human Health<br>Climatic Factors<br>Material Assets |



## Use of the SA Framework

**11.8** The findings of the SA will be presented as colour coded symbols showing a score for each option against each of the SA objectives along with a concise justification for the score given, where appropriate.

**11.9** It is proposed to use the colour coding as shown in **Figure 11.1** below.

**Figure 11.1 SA effect symbols/colours**

|        |  |
|--------|--|
| ++     | Significant positive effect likely                           |
| + +/-  | Mixed significant positive and minor negative effects likely |
| +      | Minor positive effect likely                                 |
| 0      | Negligible effect likely                                     |
| -      | Minor negative effect likely                                 |
| -/+    | Mixed significant negative and minor positive effects likely |
| --     | Significant negative effect likely                           |
| +/-    | Mixed minor effects likely                                   |
| + +/-- | Mixed significant effects likely                             |
| ?      | Likely effect uncertain                                      |

**11.10** The dividing line between sustainability effects is often quite small. Significant effects will be distinguished from more minor effects using:

- the SA Framework 'Guide Questions';
- the Site Assessment Criteria and Assumptions; and
- professional judgement, where necessary.

**11.11** The effect of the option on the SA objective will be considered to be significant where it is of such magnitude that it will have a noticeable and measurable effect compared with other factors that may influence the achievement of that SA objective.

**11.12** In determining the significance of the effects of the options for potential inclusion in the Part 2 JLP it will be

important to bear in mind the Babergh and Mid Suffolk Part 2 JLP's relationship with the other documents in the planning system such as the NPPF and other national policy approaches, and regulatory requirements, as these may provide additional safeguards or mitigation of potentially significant negative effects.

### Reasonable alternatives

**11.13** The SA must appraise not only the preferred options for inclusion in the Local Plan but "reasonable alternatives" to these options. This implies that alternatives that are not reasonable do not need to be subject to appraisal. Part (b) of Regulation 12(2) notes that reasonable alternatives will take into account the objectives of the JLP (Parts 1 and 2), as well as its geographical scope. Therefore, alternatives that do not meet the objectives of national policy, or are outside the Plan area, are unlikely to be reasonable.

**11.14** The objectives, policies and site allocations to be considered for inclusion within the Part 2 JLP are in the process of being identified and reviewed. BMSDC have already identified five spatial strategy options to be subject to SA, as outlined towards the end of this chapter. The Councils' reasons for selecting the alternatives to be included in the JLP will be reported at a later stage in the SA process.

### Assumptions

**11.15** SA inevitably relies on an element of subjective judgement. However, in order to ensure consistency in the appraisal of the site options, for each of the SA objectives in the SA framework, a clear set of decision-making criteria and assumptions for determining significance of the effects are set out. These assumptions set out clear parameters within which certain SA effects would be identified, based on factors such as the distance of site options from features such as biodiversity designations, public transport links and areas of high landscape sensitivity. The assumptions, many of which are applied through the use of Geographical Information Systems (GIS) data, are presented in **Appendix A**.

**11.16** It should be noted that it may be necessary to refine the criteria and assumptions during the course of the SA work, for example to respond to consultation comments, or to ensure that they remain appropriate with respect to the evidence base and the alternative options being considered for inclusion in the Part 2 JLP.

### 'Policy-off' site appraisals and mitigation

**11.17** The appraisal of potential site allocations will, initially, be on the basis of the criteria and assumptions set out in **Appendix A**.

**11.18** There is likely to be a large number of sites that will require appraisal, which is why a primarily GIS based approach is being used, coupled with specific evidence studies commissioned to inform the SA. This approach will help to ensure that consistency and objectivity is achieved between the site appraisals.

**11.19** This initial appraisal will, in effect, be 'policy-off'. This means that each site will be appraised without reference to any potential mitigation. The purpose is to determine how each site performs 'on its own merits' without the need for intervention through mitigation. This is in accordance with the mitigation hierarchy.

### The mitigation hierarchy

The mitigation hierarchy is:

- Avoid
- Mitigate
- Compensate

This means it is preferable to avoid a significant negative effect occurring in the first instance than it is to mitigate a significant effect, and it is preferable to mitigate a significant effect than compensate for it, where mitigation is not possible.

**11.20** Mitigation can take many forms:

- With respect to environmental effects, mitigation could involve the use of buffer zones for biodiversity sites, or guidance for development that could harm the setting of historic assets.
- In some instances, for example for large sites that are not well located to jobs, services and facilities, it may be possible to mitigate significant effects by providing jobs, services and facilities on site as part of development, such as the provision of a neighbourhood centre, a primary school, or bus services.

**11.21** The policy-off appraisal will enable the SA to focus further analysis on those sites where potentially significant negative effects are identified in order to determine whether mitigation is possible, rather than describe every potential effect.

**11.22** Mitigation may have the effect of reducing a significant negative effect to a minor or negligible effect, or it may result in a significant negative effect becoming a positive effect (e.g. where a new school is proposed as part of a development).

### Cumulative effects

**11.23** The identification of cumulative effects will be addressed in three ways:

- Potential cumulative effects of proposed development in a particular location (e.g. the cumulative effects of more than one site being allocated at a certain village or town).
- The cumulative effects on each of the SA objectives of the Part 2 JLP as a whole (i.e. of all the policies and site allocations in the Part 2 JLP).
- The potential for cumulative effects of the Part 2 JLP together with the Part 1 JLP, in addition to other planned developments, such as adopted or emerging Local Plans for neighbouring districts.

### Spatial strategy options

**11.24** To date, BMSDC have identified five spatial options to be subject to SA. These five options draw on the spatial options work previously undertaken when preparing the SA that accompanied the Joint Local Plan, when it was originally being prepared as a single plan. In the next iteration of the SA Report, these five spatial strategy options will be subject to appraisal.

**11.25** Some of spatial strategy options include the Ipswich Fringe Area, which is the area just within the edge of both Districts bordering Ipswich Borough. Many people live in this area and commute to Ipswich for work, and to make use of the services and facilities on offer in the town. The Ipswich Fringe Area is of great importance to both Districts as a result of cross boundary service provision and functions. There are, however, different areas within the Ipswich Fringe Area that have more amenities than others and better access to the town, and so could be considered more sustainable than others.

- **Spatial Option 1:** Concentration of growth in the Ipswich Fringe Area and the main towns.
- **Spatial Option 2:** Concentration of growth in the Ipswich Fringe Area, main towns and main villages.
- **Spatial Option 3:** Concentration of growth in the main towns and main villages..
- **Spatial Option 4:** Proportionate growth by population.
- **Spatial Option 5:** Garden communities.

## Chapter 12

### Consultation and next steps

**12.1** In order to meet the requirements of the SEA Regulations, the views of the three statutory consultees (Environment Agency, Historic England and Natural England) are being sought in relation to the scope and level of detail to be included in the SA Report. Comments from other stakeholders and the public are also invited.

**12.2** The consultees are in particular requested to consider:

- Whether there are any additional plans, policies or programmes that are relevant to the SA that should be included.
- Whether the baseline information provided is robust and comprehensive and provides a suitable baseline for the SA of the Part 2 JLP.
- Whether there are any additional key sustainability issues relevant to the plan area that should be included.
- Whether the SA framework (Chapter 11) is appropriate and includes a suitable set of SA objectives.
- Whether the criteria and assumptions for appraising potential site allocations are appropriate for this stage of the SA process, and a suitable refinement on those used to date.

**12.3** Responses from consultees will be reviewed and appropriate amendments made to the detail contained in the Scoping Report, including the baseline, policy context and SA Framework where necessary. Any updates to this detail will be presented at the next stage of the Part 2 JLP preparation process.

LUC  
August 2024



# Appendix A

## Criteria and assumptions to be applied in the SA of site options

**A.1** The site assessment criteria and assumptions are designed to identify the potential for significant effects of development at a particular site, and to ensure that all sites are appraised consistently and objectively.

**A.2** The proposed site assessment criteria and assumptions are presented in **Tables A.3 and A.4**. As explained in **Chapter 11**, these criteria were used to appraise the Joint Local Plan before it was decided that the JLP would be set out in two parts. The criteria have since been amended, as described in **Table A.5**.

### Assumptions regarding distances

**A.3** Reference is made to distances in the site assessment criteria and assumptions. The most sustainable and easily achievable mode of transport is walking, and the distances relate to walking distances.

**A.4** There are a number of pieces of research that give a variety of recommended guidance distances for walking. For example, the Institute of Highways and Transportation found that the average length of a walk journey is one kilometre. The Institute of Highways and Transportation categorises distances depending upon location and purpose of the trip, and 'desirable', 'acceptable', and 'preferred maximum':

**Table A.1 Institute of Highways and Transportation Walking distances**

|                   | Town centres (m) | Commuting/ school/ Sight-seeing (m) | Elsewhere (m) |
|-------------------|------------------|-------------------------------------|---------------|
| Desirable         | 200              | 500                                 | 400           |
| Acceptable        | 400              | 1,000                               | 800           |
| Preferred maximum | 800              | 2,000                               | 1,200         |

**A.5** For the purposes of the appraisal, distances in the appraisal will be measured as the straight line distance from the edge of the site option to existing services and facilities, and therefore actual walking distances are likely to be greater (e.g. depending on the house location within a larger site and the availability of a direct route).

**A.6** Given the wide range of services and facilities normally considered in SAs, LUC has developed some guideline distances that it uses in its SA work, which are reflected in the SA site assessment criteria and assumptions for the Part 2 JLP. These are as follows:

**Table A.2 Walking distance assumptions**

| Site assessment criterion: Proximity to... | Desirable | Acceptable  | Preferred maximum |
|--|-----------|-------------|-------------------|
| GP surgeries/ health centres               | <= 400 m  | 401-800 m   | 801-1,200 m       |
| Primary or middle schools                  | <= 400 m  | 401-800 m   | 801-1,200 m       |
| Secondary schools                          | <= 500 m  | 501-1,000 m | 1001-2,000 m      |
| Further and higher education facilities    | <= 500 m  | 501-1,000 m | 1001-2,000 m      |
| Local centres                              | <= 200 m  | 201-400 m   | 401-800 m         |
| Town centres                               | <= 400 m  | 401-800 m   | 801-1,200 m       |
| Railway stations                           | <= 500 m  | 501-1,000 m | 1001-2,000 m      |
| Bus stops                                  | <= 200 m  | 201-400 m   | 401-800 m         |
| Cycle paths                                | <= 200 m  | 201-400 m   | 401-800 m         |
| Open spaces and sports centres             | <= 400 m  | 401-800 m   | 801-1,200 m       |
| Public rights of way (PRoW)                | <= 200 m  | 201-400 m   | 401-800 m         |
| Centres of employment                      | <= 500 m  | 501-1,000 m | 1,001-2,000 m     |

Table A.3 Residential site assessment criteria and assumptions

| SA objective   | Criteria   | Major positive (++)   | Minor positive (+)  | Negligible (0) | Minor negative (-)  | Major negative (--)                                    | Data  | Significance scoring   |
|--|--|---|---|----------------|---|--|---|--|
| 1. To improve the health and wellbeing of the population overall and reduce health inequalities. | <p>Residential sites that are close to existing healthcare facilities (i.e. GP surgeries) will help to ensure residents have easy access to healthcare services so that any health concerns can be addressed. A factor not captured by the assessment of site options is whether there is capacity at those healthcare facilities to accommodate new residents and whether new residential development supports the provision of additional healthcare capacity.</p> <p>The proximity of site options to open spaces, sports and recreation facilities, in addition to open country and registered common land, could encourage participation in active outdoor recreation in both districts and the subsequent health benefits. Likewise, the loss of open spaces, sports and recreation facilities could pose a barrier to participation in active outdoor recreation.</p> <p>The proximity of site options to the Public Rights of Way network could encourage more walking, which can have beneficial effects on physical health and mental wellbeing, although this is somewhat dependent on personal preference.</p> |   |   |                |   |  |   |  |
|  | 1a GP surgeries  | <=400m from nearest NHS GP surgery  | 401-800m from nearest NHS GP surgery  | N/A            | 801-1,200m from nearest NHS GP surgery                    | >1,200m from nearest NHS GP surgery                    | ■ BMSDC GP surgery data   | <p>Each criterion 1a to 1d is scored:</p> <ul style="list-style-type: none"> <li>■ Major positive +3</li> <li>■ Minor positive +1</li> <li>■ Minor negative -1</li> <li>■ Major negative -3</li> </ul> <p>Scores totalled, and then averaged (i.e. total score divided by 4). Overall significance is scored as follows:</p> <ul style="list-style-type: none"> <li>■ Significant positive &gt;= +2</li> </ul> |
|  | 1b Open space, sport and recreation  | <=300m from open space, sport, recreation facility, open country and registered common land | 301-800m from open space, sport, recreation facility, open country and registered common land | N/A            | 801-1,200m from open space, sport and recreation facility | >1,200m from open space, sport and recreation facility | <ul style="list-style-type: none"> <li>■ BMSDC open space, sport and recreation facility data</li> <li>■ National Trust Open Country data</li> <li>■ Natural England Registered Common Land data</li> </ul> |  |



| SA objective   | Criteria   | Major positive (++)                                 | Minor positive (+)                                      | Negligible (0)  | Minor negative (-)   | Major negative (--)   | Data  | Significance scoring   |
|--|--|---|---|---|--|---|---|--|
|  | 1c Public Rights of Way (PRoW)   | <=200m from PRoW                                    | 201-400m from PRoW                                      | N/A   | 401-800m from PRoW   | >800m from PRoW   | <ul style="list-style-type: none"> <li>BMSDC Public Rights of Way data</li> </ul>   | <ul style="list-style-type: none"> <li>Minor positive &gt;0 to &lt;2</li> <li>Minor negative &lt;0 to &gt;-2</li> <li>Significant negative &lt;= -2</li> </ul>   |
|  | 1d Loss of open space  | N/A   | N/A   | Site rated 'green' in the SHELAA in relation to impact on formal recreation provision – site would not impact on provision. | Site rated 'amber' in the SHELAA in relation to impact on formal recreation provision – potential for loss of provision to be mitigated. | Site rated 'red' in the SHELAA in relation to impact on formal recreation provision – site would result in loss of provision. | <ul style="list-style-type: none"> <li>SHELAA</li> </ul>  |  |
| 2. To maintain and improve levels of education and skills in the population overall. | The effect of residential site options on the educational element of this objective was assessed on the basis of the access that they provide to existing educational facilities. A factor not captured by the assessment of site options is whether there is capacity at those educational facilities to accommodate new pupils and whether new residential development supports the provision of additional school places. |   |   |   |  |   |   |  |
|  | 2a Primary schools   | <=400m from primary school                          | 401-800m from primary school                            | N/A   | 801-1,200m from primary school   | >1,200m from primary school   | <ul style="list-style-type: none"> <li>BMSDC primary school data</li> </ul>   | Each criterion 2a to 2b is scored: <ul style="list-style-type: none"> <li>Major positive +3</li> <li>Minor positive +1</li> <li>Minor negative -1</li> <li>Major negative -3</li> </ul> Scores totalled, and then averaged (i.e. total score divided by 2). Overall significance is scored as follows: |
|  | 2b Secondary schools   | <=800m from secondary school                        | 800-5,000m from secondary school                        | N/A   | N/A  | >5,000m from secondary school   | <ul style="list-style-type: none"> <li>SHELAA</li> </ul>  |  |
|  | 2c Further and higher education facilities   | <=500m from further and higher education facilities | 501-1,000m from further and higher education facilities | N/A   | 1,001-2,000m from further and higher education facilities  | >2,000m from further and higher education facilities  | <ul style="list-style-type: none"> <li>BMSDC further education facilities data</li> <li>BMSDC higher education facilities data</li> </ul> |  |

| SA objective  | Criteria   | Major positive (++)   | Minor positive (+)   | Negligible (0)  | Minor negative (-) | Major negative (--) | Data                            | Significance scoring  |
|---|--|---|--|-----------------|--------------------|---------------------|---------------------------------|---|
|   |  |   |  |                 |                    |                     |                                 | <ul style="list-style-type: none"> <li>■ Significant positive <math>\geq +2</math></li> <li>■ Minor positive <math>&gt;0</math> to <math>&lt;2</math></li> <li>■ Negligible 0</li> <li>■ Minor negative <math>&lt;0</math> to <math>&gt;-2</math></li> <li>■ Significant negative <math>\leq -2</math></li> </ul> <p>Criterion 2c not used for significance scoring as 2a and 2b are main determinants of access to education</p> |
| 3. To reduce poverty and social exclusion and ensure access to jobs and services. | <p>Babergh District is ranked 212 out of 317 local authorities in England (1 being the most deprived) in the Index of Multiple Deprivation, while Mid Suffolk District is ranked 229. Both districts contain some Lower-Layer Super Output Areas (LSOAs) that fall within the 30% most deprived in England, with Mid Suffolk District containing one LSOA that falls within the 20% most deprived in England. Therefore, site options that fall within the most deprived areas of the districts have the potential to help regenerate those areas through residential development and the delivery of supporting infrastructure.</p> <p>The position of settlements in the settlement hierarchy is informed by the range of services and facilities available, and so indicates which locations are likely to provide easy access to services. Therefore, site options located within or adjacent to settlements towards the top of the settlement hierarchy are likely to provide better access to services than elsewhere, helping reducing inequalities in access to services.</p> <p>The proximity of site options to existing employment areas will affect how easily residents can access job opportunities. Site options located close to centres of employment will help ensure easy access to jobs.</p> |   |  |                 |                    |                     |                                 |   |
|   | 3a IMD   | Site located within one of the 20% most deprived areas nationally | Site located within one of the 20-50% most deprived areas nationally | All other sites | N/A                | N/A                 | ■ Index of Multiple Deprivation | Each criterion 3a to 3c is scored:<br>■ Major positive +3   |

| SA objective  | Criteria   | Major positive (++)  | Minor positive (+)   | Negligible (0) | Minor negative (-)  | Major negative (--)   | Data  | Significance scoring  |   |
|---|--|--|--|----------------|---|---|---|---|---|
|   | 3b Settlement hierarchy  | <i>TBC – criterion will be based on the updated BMSDC settlement hierarchy when it is available.</i> |  |                |   |   |   | <ul style="list-style-type: none"> <li>■ BMSDC Settlement Hierarchy</li> </ul>  | <ul style="list-style-type: none"> <li>■ Minor positive +1</li> <li>■ Negligible 0</li> <li>■ Minor negative -1</li> <li>■ Major negative -3</li> </ul> <p>Scores totalled, and then averaged (i.e. total score divided by 3). Overall significance is scored as follows:</p> |
|   | 3c Centres of employment   | <=500m from Strategic Employment Site/Enterprise Zone/Neighbourhood Plan Employment Site             | 501-1,000m from Strategic Employment Site/Enterprise Zone/Neighbourhood Plan Employment Site | N/A            | 1,001-2000m from Strategic Employment Site/Enterprise Zone/Neighbourhood Plan Employment Site | >2,000m from Strategic Employment Site/Enterprise Zone/Neighbourhood Plan Employment Site | <ul style="list-style-type: none"> <li>■ BMSDC Strategic Employment Site data</li> <li>■ BMSDC Enterprise Zone data</li> <li>■ BMSDC Neighbourhood Plan Employment Site data</li> </ul> | <ul style="list-style-type: none"> <li>■ Significant positive &gt;= +2</li> <li>■ Minor positive &gt;0 to &lt;2</li> <li>■ Negligible 0</li> <li>■ Minor negative &lt;0 to &gt;-2</li> <li>■ Significant negative &lt;= -2</li> </ul> |   |
| 4. To meet the housing requirements of the whole community. | All residential site options are expected to have positive effects on this objective, due to the nature of the proposed development. Larger sites will provide opportunities for the development of a larger number of homes and so would have significant positive effects. |  |  |                |   |   |   |   |   |
|   | Access to housing can be influenced by location and socioeconomic status, therefore this assessment considers the physical and financial accessibility of housing through the 'Barriers to housing and services' domain of the Index of Multiple Deprivation.                |  |  |                |   |   |   |   |   |
|   | 4a Housing provision   | Significantly contributes to the   | Contributes to the delivery of housing:  | N/A            | N/A   | N/A   | <ul style="list-style-type: none"> <li>■ Contained within the</li> </ul>  | Each criterion 4a to 4b is scored:  |   |



| SA objective               | Criteria   | Major positive (++)   | Minor positive (+)  | Negligible (0)  | Minor negative (-) | Major negative (--) | Data   | Significance scoring   |
|----------------------------|--|---|---|-----------------|--------------------|---------------------|--|--|
|                            |  | delivery of housing:<br>>=250 dwellings   | <250 dwellings  |                 |                    |                     | shapefile for each site  | <ul style="list-style-type: none"> <li>■ Major positive +3</li> <li>■ Minor positive +1</li> <li>■ Negligible 0</li> <li>■ Minor negative -1</li> <li>■ Major negative -3</li> </ul> <p>Scores totalled, and then averaged (i.e. total score divided by 2). Overall significance is scored as follows:</p> <ul style="list-style-type: none"> <li>■ Significant positive &gt;= +2</li> <li>■ Minor positive &gt;0 to &lt;2</li> <li>■ Minor negative &lt;0 to &gt;-2</li> <li>■ Significant negative &lt;= -2</li> </ul> |
|                            | 4b Barriers to housing and services  | Site located within one of the 20% most deprived areas nationally ('Barriers to housing and services' domain of English Indices of Deprivation) | Site located within one of the 20-50% most deprived areas nationally ('Barriers to housing and services' domain of English Indices of Deprivation). | All other sites | N/A                | N/A                 | <ul style="list-style-type: none"> <li>■ 'Barriers to housing and services' domain of the Index of Multiple Deprivation</li> </ul> |  |
| 5. To conserve and enhance | The location of development could affect water quality during construction depending on whether it falls within a Source Protection Zone or not, and which Source Protection Zone(s). The extent to which water quality is actually affected would depend on construction techniques and the use of Sustainable Drainage Systems (SuDS) within design. |   |   |                 |                    |                     |  |  |

| SA objective                 | Criteria                   | Major positive (++) | Minor positive (+) | Negligible (0)   | Minor negative (-)                               | Major negative (--)                         | Data   | Significance scoring   |
|------------------------------|----------------------------|---------------------|--------------------|------------------|--|---|--|--|
| water quality and resources. | 5a Source Protection Zones | N/A                 | N/A                | All other sites. | Site falls within Source Protection Zone 2 or 3. | Site falls within Source Protection Zone 1. | <ul style="list-style-type: none"> <li>Environment Agency Source Protection Zones data</li> </ul>            | <p>Each criterion 5a to 5b is scored:</p> <ul style="list-style-type: none"> <li>Major positive +3</li> <li>Minor positive +1</li> <li>Negligible 0</li> <li>Minor negative -1</li> <li>Major negative -3</li> </ul> <p>Scores totalled, and then averaged (i.e. total score divided by 2). Overall significance is scored as follows:</p> <ul style="list-style-type: none"> <li>Significant positive <math>\geq +2</math></li> <li>Minor positive <math>&gt;0</math> to <math>&lt;2</math></li> <li>Negligible 0</li> <li>Minor negative <math>&lt;0</math> to <math>&gt;-2</math></li> <li>Significant negative <math>\leq -2</math></li> </ul> |
|                              | 5b Water quality           | N/A                 | N/A                | All other sites. | Site within 100m of a watercourse or water body, | Site contains a watercourse or water body.  | <ul style="list-style-type: none"> <li>OS open rivers watercourse s data</li> <li>OS water bodies</li> </ul> |  |

| SA objective  | Criteria   | Major positive (++) | Minor positive (+) | Negligible (0)   | Minor negative (-)   | Major negative (--)  | Data                                    | Significance scoring  |
|---|--|---------------------|--------------------|------------------|--|--|---|---|
| 6. To maintain and where possible improve air quality and reduce noise pollution. | <p>The assessment of effects of site options in relation to air quality and noise pollution focuses on the variation across the Pan area in baseline concentrations of key air pollutants and noise, and how residential development at different locations would result in different levels of exposure to these pollutants. The assessment of site options has not taken into account planned measures that will improve future air quality (such as the Government's ban on the sale of new petrol and diesel cars by 2035), or site-specific mitigation. The effect of the Plan as a whole on air quality and noise pollution will be assessed within the cumulative effects section of the IIA.</p> <p>In 2021, the WHO updated its recommended guidelines for air pollutants<sup>332</sup>. The new air quality guidelines reflect the best available health evidence and WHO's recommendations continue to be recognised globally as the targets that should be met to protect public health. Minor negative effects are assumed to occur when residential development would occur in a location where the current baseline annual mean concentration of a pollutant exceeds these 2021 WHO guidelines. Major negative effects are assumed to occur in locations where current annual mean pollution exceeds both the 2021 WHO air quality guidelines and the higher pollution levels allowed under the UK's national air quality objectives<sup>333</sup>.</p> <p>Site options located within close proximity of roads and railway lines are likely to be more vulnerable to noise pollution than elsewhere. Likewise, site options located within close proximity of waste management facilities will be more vulnerable to odour and this can have an adverse effect on air quality.</p> |                     |                    |                  |  |  |   |   |
|   | 6a AQMAs   | N/A                 | N/A                | All other sites. | Site located within 25km of an Air Quality Management Area (AQMA)    | Site located within 12.5km of an AQMA                              | ■ BMSDC AQMA data                       | If any of the criteria score major negative then the score is significant negative.               |
|   | 6b NO <sub>2</sub> pollution   | N/A                 | N/A                | All other sites  | >=25% of site has pollutant concentration of 10-40 µg/m <sup>3</sup> | >=25% of site has pollutant concentration of >40 µg/m <sup>3</sup> | ■ Defra NO <sub>2</sub> pollution data  | If two or more of criteria 6a to 6f score minor negative, then the score is significant negative. |
|   | 6c PM <sub>10</sub> pollution  | N/A                 | N/A                | All other sites  | >=25% of site has pollutant concentration of 15-40 µg/m <sup>3</sup> | >=25% of site has pollutant concentration of >40 µg/m <sup>3</sup> | ■ Defra PM <sub>10</sub> pollution data | If only one criterion 6a to 6f scores minor negative, then the score is minor negative.           |

<sup>332</sup> WHO global air quality guidelines: particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>), ozone, nitrogen dioxide, sulfur dioxide and carbon monoxide" - <https://www.who.int/publications/i/item/9789240034228>

<sup>333</sup> See [https://uk-air.defra.gov.uk/assets/documents/Air\\_Quality\\_Objectives\\_Update\\_20230403.pdf](https://uk-air.defra.gov.uk/assets/documents/Air_Quality_Objectives_Update_20230403.pdf)



| SA objective                               | Criteria   | Major positive (++) | Minor positive (+) | Negligible (0)   | Minor negative (-)  | Major negative (--)   | Data  | Significance scoring                  |
|--|--|---------------------|--------------------|------------------|---|---|---|---------------------------------------|
|  | 6d PM <sub>2.5</sub> pollution   | N/A                 | N/A                | All other sites  | >=25% of site has pollutant concentration of 5-20 µg/m <sup>3</sup>   | >=25% of site has pollutant concentration of >20 µg/m <sup>3</sup>  | <ul style="list-style-type: none"> <li>Defra PM<sub>2.5</sub> pollution data</li> </ul>   | All other sites score negligible (0). |
|  | 6e Noise   | N/A                 | N/A                | All other sites. | For road and rail noise, sites within:<br><br>A-weighted equivalent continuous sound level daytime - 16 hour (0700-2300) exceeding 59.9dB | For road and rail noise, sites within:<br><br>A-weighted equivalent continuous sound level at night (2300-0700) exceeding 54.9dB.<br><br><b>AND/OR</b><br><br><= 250m Site Safeguard Area of a waste management facility. | <ul style="list-style-type: none"> <li>Defra road and rail noise data</li> <li>BMSDC Site Safeguard Area of a waste management facility data</li> <li>BMSDC waste management facility data</li> </ul> |                                       |
|  | 6f Odour   | N/A                 | N/A                | All other sites. | N/A   | Sites within the 400m of a water recycling centre.  | <ul style="list-style-type: none"> <li>BMSDC Safeguard Area of a water recycling centre</li> </ul>  |                                       |
| 7. To conserve soil and mineral resources. | <p>The appraisal of site options in relation to this SA objective consider whether the site is greenfield or brownfield, what quality of agricultural land it contains and whether it falls within a Minerals Safeguarding Area, or an existing or planned minerals extraction site. Development on brownfield land represents a more efficient use of land in comparison to the development of greenfield land. Land classified as Grades 1, 2 or 3a agricultural land is considered best and most versatile agricultural land. Due to the fact Grade 3a and 3b agricultural land data was not available, the criteria refer to Grade 3 agricultural land instead. If a site option is located within a Minerals Safeguarding Area or a site allocated in Suffolk County Council's Minerals and Waste Plan, it could potentially result in the sterilisation of minerals unless extracted before development.</p> |                     |                    |                  |   |   |   |                                       |

| SA objective | Criteria  | Major positive (++)                    | Minor positive (+) | Negligible (0)   | Minor negative (-)  | Major negative (--)   | Data  | Significance scoring  |
|--------------|---|--|--------------------|------------------|---|---|---|---|
|              | 7a Brownfield /greenfield land  | Wholly or partially on brownfield land | N/A                | N/A              | N/A   | Greenfield site   | <ul style="list-style-type: none"> <li>SHELAA</li> </ul>  | <p>If criterion 7a is a major positive then site scores significant positive, irrespective of criteria 7b to 7c.</p> <p>If criterion 7a is not major positive, then each criterion 7b to 7c is scored:</p> <ul style="list-style-type: none"> <li>Major positive +3</li> <li>Minor positive +1</li> <li>Negligible 0</li> <li>Minor negative -1</li> <li>Major negative -3</li> </ul> <p>Scores totalled, and then averaged (i.e. total score divided by 2). Overall significance is scored as follows:</p> <ul style="list-style-type: none"> <li>Significant positive &gt;= +2</li> <li>Minor positive &gt;0 to &lt;2</li> <li>Minor negative &lt;0 to &gt;-2</li> <li>Significant negative &lt;= -2</li> </ul> |
|              | 7b Agricultural land classification   | N/A                                    | N/A                | All other sites. | Significant proportion (>=25%) of site on Grade 3 agricultural land | Significant proportion (>=25%) of site on Grade 1 or 2 agricultural land  | <ul style="list-style-type: none"> <li>Natural England Agricultural Land Classification</li> </ul>  |   |
|              | 7c Minerals Consultation Area, existing or planned mineral extraction sites | N/A                                    | N/A                | All other sites. | Site is within a Minerals Consultation Area                         | Site is within a Minerals Safeguarding Area or is within 250m of an existing or planned site allocated in the Suffolk Minerals and Waste Local Plan | <ul style="list-style-type: none"> <li>BMSDC Minerals Consultation Area</li> <li>BMSDC Minerals Safeguarding Area</li> <li>Suffolk County Council existing and proposed mineral extraction sites</li> </ul> |   |

| SA objective                                       | Criteria   | Major positive (++) | Minor positive (+) | Negligible (0) | Minor negative (-) | Major negative (--) | Data | Significance scoring |
|--|--|---------------------|--------------------|----------------|--------------------|---------------------|------|----------------------|
| 8. To promote the sustainable management of waste. | <p>The location of sites is not likely to influence the consumption of materials or resources, volumes of waste produced including the generation of hazardous waste, or the construction/demolition waste going to landfill. Nor is the location of sites likely to have an effect on the recovery, re-use or recycling of waste materials, or the demand for recycled material. These details will be promoted and secured through the detailed design proposals for each site at the planning application stage and strategic policies.</p> <p>The location of housing and employment sites will not have an effect on sustainable design and construction techniques, as these are decided at the design stage of development. Therefore, the effects of the potential sites on this SA objective will be assumed to be negligible. Therefore, this SA objective has been scoped out of the site option appraisals for the reasons outlined below.</p>   |                     |                    |                |                    |                     |      |                      |
|  | 8a Consumption of materials and resources  | N/A                 | N/A                | N/A            | N/A                | N/A                 | N/A  | N/A                  |
|  | 8b Sustainable design and construction techniques  | N/A                 | N/A                | N/A            | N/A                | N/A                 | N/A  | N/A                  |
| 9. To reduce contribution to climate change.       | <p>The location of site options will not have an effect on levels of domestic energy consumption and the potential for renewable energy use. These factors are influenced more by the specific design and construction methods used, and whether renewable energy infrastructure is incorporated into development. If there are known site-specific factors that allow for the incorporation of viable district heating networks, or combined heat and power, these will score positively in the site assessment.</p> <p>The criteria listed below generally look at the proximity of site options to various services and facilities, and public transport. It is considered that combining these criteria will help to identify whether a site performs well or poorly in relation to criterion 9a. Site options located within close proximity of services and facilities are likely to reduce reliance on the private car and encourage walking and cycling, although this is somewhat dependent on personal preference. Reducing reliance on the private car could help minimise greenhouse gas emissions, which contribute towards climate change.</p> |                     |                    |                |                    |                     |      |                      |



| SA objective   | Criteria   | Major positive (++)  | Minor positive (+)   | Negligible (0)  | Minor negative (-)   | Major negative (--)  | Data | Significance scoring  |
|--|--|--|--|---|--|--|------|---|
|  | 9a Transport links   | Sites that perform very well against the following criteria:<br>1a to 1d<br>2a to 2c<br>3b to 3c<br>16a to 16c | Sites that perform moderately well against the following criteria:<br>1a to 1d<br>2a to 2c<br>3b to 3c<br>16a to 16c | Sites that have average performance against the following criteria:<br>1a to 1d<br>2a to 2c<br>3b to 3c<br>16a to 16c | Sites that perform moderately poorly against the following criteria:<br>1a to 1d<br>2a to 2c<br>3b to 3c<br>16a to 16c | Sites that perform very poorly against the following criteria:<br>1a to 1d<br>2a to 2c<br>3b to 3c<br>16a to 16c | N/A  | Scores for each criterion totalled. Overall significance scored as follows:<br><br>Significant positive: sites where total score for all criteria added $\geq 11.0$<br><br>Minor positive: sites where total score for all criteria added $> 0$ and $< 11.0$<br><br>Negligible: sites where total score for all criteria added $= 0$<br><br>Minor negative: sites where total score for all criteria added $< 0$ and $> -11.0$<br><br>Significant negative: sites where total score for all criteria added $\leq -11.0$ |
| 10. To reduce vulnerability and increase resilience to | The extent to which flood risk can be managed and reduced is considered below. The location of development has the potential to affect the achievement of this objective, although it is noted that effects will depend largely on the detailed proposals for sites and their design which would be influenced by policies in the Local Plan and details submitted at the planning application stage. Those policies in the Local Plan have been appraised separately to the site options. The location of site options will not have an effect on sustainable design and construction techniques (including SuDS), as these are decided at the design stage of development. |  |  |   |  |  |      |   |

| SA objective   | Criteria  | Major positive (++) | Minor positive (+) | Negligible (0)   | Minor negative (-)  | Major negative (--)  | Data  | Significance scoring  |
|--|---|---------------------|--------------------|------------------|---|--|---|---|
| extreme weather events and flooding which may be caused by climate change. | 10a Flood Zones   | N/A                 | N/A                | All other sites. | >=25% of site within Flood Zone 2                                 | >=25% of site within Flood Zone 3                                | <ul style="list-style-type: none"> <li>■ Environment Agency Flood Zone 3</li> <li>■ Environment Agency Flood Zone 2</li> </ul>  | <p>If either criterion 10a or 10b is a major negative, then a significant negative is given.</p> <p>If both criteria are minor negative, then a significant negative is given.</p> <p>If only one criterion scores minor negative and the other scores negligible, then a minor negative is given.</p> <p>All other sites score negligible (0).</p> |
|  | 10b Surface water flooding  | N/A                 | N/A                | All other sites. | Contains land with a 1 in 100 year risk of surface water flooding | Contains land with a 1 in 30 year risk of surface water flooding | <ul style="list-style-type: none"> <li>■ Environment Agency 1:30 surface water flooding data</li> <li>■ Environment Agency 1:100 surface water flooding data</li> </ul> |   |
| 11. To conserve and enhance biodiversity and geodiversity.                 | <p>Site options that are close to internationally, nationally or locally conservation sites have the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, or increased recreation pressure.</p> <p>Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, it is generally not proportionate to attempt to identify the particular biodiversity assets present at different locations and their sensitivity to different types of development (although Impact Risk Zones defined by Natural England provide a useful proxy for this in relation to SSSIs and internationally designated sites). Instead, this would be determined once more specific proposals are developed and submitted as part of a planning application.</p> |                     |                    |                  |   |  |   |   |

| SA objective | Criteria  | Major positive (++) | Minor positive (+) | Negligible (0)   | Minor negative (-)   | Major negative (--)   | Data   | Significance scoring  |
|--------------|---|---------------------|--------------------|------------------|--|---|--|---|
|              | 11a<br>Internationally and nationally designated biodiversity and geodiversity assets | N/A                 | N/A                | All other sites  | Site falls within the Protected Habitats Zone of Influence                         | >=1% of site intersects with internationally or nationally designated site                          | <ul style="list-style-type: none"> <li>■ BMSDC Protected Habitats Zone of Influence</li> <li>■ SHELAA</li> </ul>   | <p>If any of the criteria score major negative then the score is significant negative.</p> <p>If two or more of criteria 11a to 11c score minor negative, then the score is significant negative.</p> |
|              | 11b<br>Locally/county designated sites, priority habitats and ancient woodland        | N/A                 | N/A                | All other sites. | <=250m from a locally/county designated site, priority habitat or ancient woodland | >=1% of site intersects with a locally/county designated site, priority habitat or ancient woodland | <ul style="list-style-type: none"> <li>■ BMSDC/Suffolk Biodiversity Information Service Local Nature Reserve data</li> <li>■ BMSDC County Wildlife Site data</li> <li>■ Natural England Priority Habitat Inventory</li> <li>■ Natural England</li> </ul> | <p>If only one criterion 11a to 11c scores minor negative, then the score is minor negative.</p> <p>All other sites score negligible (0).</p>   |



| SA objective   | Criteria  | Major positive (++)   | Minor positive (+)  | Negligible (0)   | Minor negative (-)  | Major negative (--) | Data   | Significance scoring |
|--|---|---|---|--|---|---------------------|--|----------------------|
|  |   |   |   |  |   |                     | Ancient Woodland   |                      |
| 12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.               | The NPPF states that the "significance [of a heritage asset] can be harmed or lost through alteration of destruction of the heritage asset or development within its setting". However, development could also enhance the significance of the asset, provided that the development preserves those elements of the setting that make a positive contribution to or better reveal the significance of the asset. In all cases, effects from a Local Plan site allocation will be subject to a degree of uncertainty as the actual effects on heritage assets will depend on the particular scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features, for example where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect.<br><br>The tests outlined below are intended to provide a basis for screening for the potential for adverse effects on heritage assets and their settings. |   |   |  |   |                     |  |                      |
|  | 12a Nationally and locally designated and non-designated heritage assets  | Beneficial effects are challenging to register and only in rare circumstances can a new development make a positive contribution to the significance of a heritage asset – for example, by removing harmful elements of its current setting, to better-reveal its character and significance. (Typically, it may only improve the visual and experiential qualities of an asset's context – however, this is a townscape and visual rather than an historic environment consideration.) | Development would not physically change any designated or non-designated heritage assets and would conserve their setting, resulting in no material change to the heritage asset's significance, or the way in which it is perceived or understood. | A minor negative effect occurs where allocation has the potential to cause minor effects to assets of high or medium significance as a consequence of setting change; and/ or, where assets of low significance may experience physical or setting change, resulting in any degree of effect (minor to significant). | A significant negative effect occurs where, as result of allocation, assets of medium or high significance are subject to a significant degree of effect, via setting or physical change. | ■ LUC               | Scoring of significance will match the scoring of major, minor and negligible effects. |                      |
| The tests outlined below are intended to provide a basis for screening for the potential for adverse effects on the landscape and townscape. |   |   |   |  |   |                     |  |                      |

| SA objective  | Criteria   | Major positive (++) | Minor positive (+)   | Negligible (0)                       | Minor negative (-)  | Major negative (--)                                    | Data  | Significance scoring   |
|---|--|---------------------|--|--------------------------------------|---|--|---|--|
| 13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes. | 13a Landscape sensitivity  | N/A                 | Site will result in derelict or degraded land being brought back into beneficial use | Site is of low landscape sensitivity | Site is of moderate or low-moderate landscape sensitivity | Site is of high or moderate-high landscape sensitivity | ■ LUC   | Scoring of significance will match the scoring under criterion 13a (which takes into account effects on AONBs under criterion 13b) |
|   | 13b National Landscape   | N/A                 | N/A  | All other sites.                     | Site is within 1km of a National Landscape.               | Site is within a National Landscape.                   | ■ Natural England National Landscape  |  |
| 14. To achieve sustainable levels of prosperity and economic growth throughout the Plan area.   | The location of site options will influence the achievement of this objective by affecting how easily residents are able to access job opportunities. If a residential site option falls into an existing employment area, it could potentially result in a loss of employment land, limiting economic growth. |                     |  |                                      |   |  |   |  |
|   | 14a Employment deprivation   | N/A                 | N/A  | All sites.                           | N/A   | N/A  | N/A   | Scoring of significance will match the scoring under criterion 14b.  |
|   | 14b Employment sites   | N/A                 | N/A  | All other sites.                     | Loss of >=25% to <50% of an existing employment area      | Loss of >= 50% of an existing employment area          | <ul style="list-style-type: none"> <li>■ BMSDC Strategic Employment Site data</li> <li>■ BMSDC Enterprise Zone data</li> <li>■ BMSDC Neighbourhood Plan Employment Site data</li> </ul> | Criterion 14a not relevant to residential sites  |

| SA objective   | Criteria   | Major positive (++)          | Minor positive (+)              | Negligible (0) | Minor negative (-)                | Major negative (--)          | Data                                   | Significance scoring   |
|--|--|------------------------------|---------------------------------|----------------|-----------------------------------|------------------------------|--|--|
|  |  |                              |                                 |                |                                   |                              |  |  |
| 15. To revitalise the Districts' town centres.                                   | New development located within or near to a town or district centre has the potential to contribute to the vitality and viability of those centres.  |                              |                                 |                |                                   |                              |  |  |
|  | 15a Town centres   | <=400m from a town centre    | 401-800m from a town centre     | N/A            | 801-1,200m from a town centre     | >1,200m from a town centre   | ■ BMSDC town centre data               | If either criterion 15a or 15b is a major negative, then a significant negative is given.<br><br>If both criteria are minor negative, then a significant negative is given.<br><br>If only one criterion scores minor negative and the other scores negligible, then a minor negative is given.<br><br>All other sites score negligible (0). |
|  | 15b District centres   | <=200m from district centre  | 201-400m from district centre   | N/A            | 401-800m from district centre     | >800m from district centre   | ■ BMSDC district centre data           |  |
| 16. To enable efficient patterns of movement and modal shift towards sustainable | The proximity of site options to railway stations and bus stops has the potential to encourage public transport use, although it is acknowledged that the actual use of public transport will depend on people's behaviour. Likewise, proximity to local cycle ways may encourage people to cycle. It is possible that new transport links such as bus routes or cycle paths will be provided as part of new developments, particularly at larger sites, but this was not assumed in assessing the site options. |                              |                                 |                |                                   |                              |  |  |
|  | 16a Rail   | <= 500m of a railway station | 501-1,000m of a railway station | N/A            | 1,001-2,000m of a railway station | >2,000m of a railway station | ■ Ordnance Survey railway station data | If criterion 16a is a major positive then site scores significant positive,  |



| SA objective        | Criteria    | Major positive (++)   | Minor positive (+)      | Negligible (0) | Minor negative (-)       | Major negative (--)   | Data   | Significance scoring  |
|---------------------|-------------|-----------------------|-------------------------|----------------|--------------------------|-----------------------|--|---|
| modes of transport. | 16b Bus     | <=300m of a bus stop  | 301-600m of a bus stop  | N/A            | 601-1,000m of a bus stop | >2,000m of a bus stop | <ul style="list-style-type: none"> <li>National Public Transport Access Nodes bus stop data</li> </ul> | irrespective of criteria 16b to 16c.<br>If criterion 16a is not major positive, then each criterion 16a to 16c is scored:<br><ul style="list-style-type: none"> <li>Major positive +3</li> <li>Minor positive +1</li> <li>Minor negative -1</li> <li>Major negative -3</li> </ul> Scores totalled, and then averaged (i.e. total score divided by 3). Overall significance is scored as follows:<br><ul style="list-style-type: none"> <li>Significant positive &gt;= +2</li> <li>Minor positive &gt;0 to &lt;2</li> <li>Minor negative &lt;0 to &gt;-2</li> <li>Significant negative &lt;= -2</li> </ul> |
|                     | 16c Cycling | <=200m of a cycle way | 201-400m of a cycle way | N/A            | 401-800m of a cycle way  | >800m of a cycle way  | <ul style="list-style-type: none"> <li>BMSDC local cycle ways data</li> </ul>                          |   |

Table A.4 Amendments to site assessment criteria and assumptions since the Part 1 JLP

| SA objective   | Criterion  | Change   | Reasoning   |
|----------------|--|--|---|
| SA objective 1 | 1a GP surgeries<br>1b Open space, sport and recreation | Footnote removed, as the effects against these criteria will no longer be downgraded if there is a physical barrier in the way.  | The SA adopts a GIS-based approach and so it will not be possible to do this. This will be identified as a limitation in the next iteration of the SA, under the 'Difficulties and data limitations' section of the report.     |
|                | NEW<br>1d Loss of open space                           | Criterion '1b Open space, sport and recreation' has been split into two so that '1b Open space, sport and recreation' looks at proximity to open space, sports and recreation facilities only and there is a separate criterion that looks at loss of open space: '1d Loss of open space'. | When there is more than one criterion, the assumptions cannot be easily input into a GIS model. The decision was taken to split criterion 1b into two criteria, as the assumptions can be more easily input into the GIS model. |
| SA objective 2 | 2a Primary schools<br>2b Secondary schools             | Footnote removed, as the effects against these criteria will no longer be downgraded if there is a physical barrier in the way.  | The SA adopts a GIS-based approach and so it will not be possible to do this. This will be identified as a limitation in the next iteration of the SA, under the 'Difficulties and data limitations' section of the report.     |
|                | 2a Primary schools                                     | All references to middle schools have been removed.  | There are no middle schools in BMSDC.   |
|                | 2a Primary schools                                     | Distance thresholds have been updated.   | For consistency with the Councils' SHELAA criteria.   |
| SA objective 3 | 3a IMD   | Text has been updated, as follows:<br>"Site located within one of the 20% / 20-50% most deprived areas <del>within the JLP area</del> <b>nationally</b> "  | Correction.   |
|                | 3b Settlement hierarchy                                | Criteria replaced with the wording " <i>TBC – criterion will be based on the updated BMSDC settlement hierarchy when it is available</i> "   | Revised settlement hierarchy not advanced enough yet to be included here.   |
|                | 3c Centres of employment                               | Footnote removed, as the effects against this criterion will no longer be downgraded if there is a physical barrier in the way.  | The SA adopts a GIS-based approach and so it will not be possible to do this. This will be identified as a limitation in the next iteration of the SA, under the 'Difficulties and data limitations' section of the report.     |
|                | 3c Centres of employment                               | Criterion updated to now also include Neighbourhood Plan Employment Sites.   | To reflect most recent data.  |

| SA objective   | Criterion  | Change  | Reasoning  |
|----------------|--|---|--|
| SA objective 4 | 4b Barriers to housing and services  | Text has been updated, as follows:<br>"Site located within one of the 20% / 20-50% most deprived areas <del>within the JLP area</del> <b>nationally</b> "   | Correction.  |
| SA objective 5 | 5b Water Resource Zones<br>5c WwTW Flow Capacity<br>5d Foul Sewerage Network Capacity                  | Replaced with a new criterion '5b Water quality', which looks at proximity to watercourses and water bodies.  | Criteria 5b, 5c and 5d are dependent on the Water Cycle study being updated and containing individual appraisals of each site. As there is some uncertainty as to when the Water Cycle Study will be updated, these three criteria have been replaced. |
| SA objective 6 | NEW<br>6b NO <sub>2</sub> pollution<br>6c PM <sub>10</sub> pollution<br>6d PM <sub>2.5</sub> pollution | Three new criteria added to cover NO <sub>2</sub> , PM <sub>10</sub> and PM <sub>2.5</sub> pollution levels.  | To reflect most recent data.   |
|                | 6b Noise<br>6f Odour   | Renumbered to 6e and 6f, respectively, as a result of the three new criteria (see above).   | To reflect most recent data.   |
| SA objective 7 | 7a Brownfield/greenfield land  | Reworded so that only major positive or major negative effects can be identified.   | To streamline the appraisal process.   |
|                | 7c Minerals Consultation Area, existing, planned or potential mineral extraction sites                 | Renamed '7c Minerals Consultation Area, existing or planned mineral extraction sites' (used to be called '7c Minerals Consultation Area, existing, planned or potential mineral extraction sites'). | The Suffolk Minerals and Waste Plan has since been updated and so the criterion has been updated to reflect most recent data.  |
| SA objective 9 | 9b Energy consumption and potential for renewable energy use   | Criterion removed as it does not result in any effects, just 'NA'.  | To streamline the appraisal process.   |



| SA objective    | Criterion  | Change  | Reasoning   |
|-----------------|--|---|---|
| SA objective 10 | 10c Sustainable design and construction techniques (including SuDS)                | Criterion removed as it does not result in any effects, just 'NA'.  | To streamline the appraisal process.  |
| SA objective 11 | 11a Internationally and nationally designated biodiversity and geodiversity assets | Renamed '11a Internationally and nationally designated biodiversity and geodiversity assets' (used to be called '11a Internationally and nationally designated biodiversity assets')  | To incorporate both biodiversity and geodiversity assets.   |
|                 | 11a Internationally and nationally designated biodiversity and geodiversity assets | Criterion for the minor negative effect (Natural England's SSSI Impact Risk Zones) has been replaced with BMSDC's Protected Habitats Zone of Influence.   | Natural England's SSSI Impact Risk Zones have been designed to be used at planning application stage instead of during the plan-making process.   |
|                 | 11b Locally/county designated sites, priority habitats and ancient woodland        | Renamed 'Locally/county designated sites, priority habitats and ancient woodland' (used to be called '11b Locally designated biodiversity assets, priority habitats and ancient woodland')  | To reflect the fact the criterion covers County Wildlife Sites (not just local sites).  |
|                 | 11c Geological sites   | Removed as incorporated into criterion '11b Locally/county designated sites, priority habitats and ancient woodland'.   | To streamline the appraisal process.  |
| SA objective 13 | Criterion 13b National Landscape   | Renamed '13b National Landscape' (used to be called '11b AONB')   | To reflect the fact that Areas of Outstanding Natural Beauty (or AONBs) are now referred to as National Landscapes.   |
| SA objective 15 | Criterion 15a Town centres   | Renamed 'Town centres' (used to be called '15a Town and district centres')  | See next row.   |
|                 | NEW<br>Criterion 15b District centres  | Criterion '15a Town centres' (formerly referred to as '15a Town and district centres') has been split into two so that '15a Town centres' looks at proximity to town centres only and there is a separate criterion that looks at proximity to local centres: '15b District centres'. | When there is more than one criterion, the assumptions cannot be easily input into a GIS model. The decision was taken to split criterion 1b into two criteria, as the assumptions can be more easily input into the GIS model. |

| SA objective    | Criterion                          | Change  | Reasoning   |
|-----------------|------------------------------------|---|---|
|                 | Criterion 15a Town centres         | Footnote removed, as the effects against this criterion will no longer be downgraded if there is a physical barrier in the way. | The SA adopts a GIS-based approach and so it will not be possible to do this. This will be identified as a limitation in the next iteration of the SA, under the 'Difficulties and data limitations' section of the report. |
| SA objective 16 | 16a Rail<br>16b Bus<br>16c Cycling | Footnote removed, as the effects against these criteria will no longer be downgraded if there is a physical barrier in the way. | The SA adopts a GIS-based approach and so it will not be possible to do this. This will be identified as a limitation in the next iteration of the SA, under the 'Difficulties and data limitations' section of the report. |