

Mid Suffolk Core Strategy Focussed Review

**Sustainability Appraisal Note for
Regulation 27 Proposed Submission**

December 2011

Mid Suffolk Core Strategy Focussed Review

Sustainability Appraisal Note for Regulation 27 Proposed Submission

December 2011

Notice

This document and its contents have been prepared and are intended solely for Mid Suffolk District Council information and use in relation to Sustainability Appraisal Note of Mid Suffolk Core Strategy Focussed Review.

Atkins Ltd assumes no responsibility to any other party in respect of or arising out of or in connection with this document and/or its contents.

Document History

JOB NUMBER:			DOCUMENT REF: Revised Focussed Changes CS SA Note Final Dec11_V4.0.docx			
4.0	Draft for comment	CW	CW	CW	CW	22.12.11
3.0	Final	LP/JF/CW	LP	CW	CW	27.10.11
2.0	Draft for comment	LP/JF/CW	LP	CW	CW	25.10.11
Revision	Purpose Description	Originated	Checked	Reviewed	Authorised	Date

Contents

Section	Page
1. Introduction	5
2. Assessment of Focussed Changes 2011	6
3. Strategic Objectives	6
4. New Policy on Mid Suffolk's Approach to Sustainable Development	9
5. Amended Policy CS 8 on Housing	11
6. Amended Policy CS11 on Employment	14
7. References	20

List of Tables

Table 2.1 - Preferred Site Proposals and Policies Assessment Scale	6
Table 2.2 – Assessment Summary of Sustainable Development Policy FC1	11
Table 2.3 – Assessment Summary of Focussed Change to Policy CS8	14
Table 2.4 – Assessment Summary of Focussed Change to Policy CS11	18

Appendices

Appendix A – 2011 Assessment Tables	21
Appendix B – 2007 Assessment Tables for Policies CS8 and CS11	39

List of Tables

Table A.1 – Assessment of Policy FC1: Mid Suffolk approach to Sustainable Development	22
Table A.2 – Assessment of Focussed Changes to Policy CS8 Provision and Distribution of Housing	28
Table B.1 – CS8 Provision and Distribution of Housing (2007)	40
Table B.2 – CS11 Employment (2007)	43

Glossary

Abbreviation	Definition
BAP	Biodiversity Action Plan
EEFM	East of England Forecasting Model
ELR	Employment Land Review
GF	Green field allocation
HRA	Habitats Regulations Assessment
IPA	Ipswich Policy Area
PDL	Previously Developed Land
SA	Sustainability Appraisal
SAAP	Stowmarket Area Action Plan
SEA	Strategic Environmental Assessment
SUDS	Sustainable Drainage Systems

1. Introduction

- 1.1 This Note sets out the findings of the Sustainability Appraisal (SA) of the Mid Suffolk Core Strategy Focussed Review Regulation 27 Proposed Submission Document. Some strategic objectives and policies contained in the adopted Core Strategy September 2008 have been amended to ensure conformity between the published Area Action Plan for Stowmarket and the adopted Core Strategy September 2008.
- 1.2 A previous SA Note accompanied the Mid Suffolk Core Strategy Focussed Review Regulation 25 Consultation and this has now been updated to reflect in full the latest focussed changes arising from consultation. This note is not a full report and readers should refer to the previously published SA Report (October 2007) for the adopted Core Strategy for full information on the SA work undertaken previously.
- 1.3 This Note takes into account of the results of the Habitats Regulations Assessment for the Focussed Review of Mid Suffolk's Core Strategy, December 2010.
- 1.4 The Core Strategy Focussed Review document includes the following:
- Focussed changes to Core Strategy Strategic Objectives;
 - New Policy on Mid Suffolk's Approach to Sustainable Development;
 - Focussed changes to Provision and Distribution of Housing (Policy CS 8); and
 - Focussed changes to Supply of Employment Land (Policy CS 11).
- 1.5 Reports and data sources that have been used to inform the assessments of the policies are listed in the references in Section 3 of this report.
- 1.6 The SA of the policies has been undertaken in compliance with the requirements of the Planning and Compulsory Purchase Act 2004¹ and the European Union Strategic Environmental Assessment (SEA) Directive 2001/42/EC and builds upon earlier SA work undertaken to inform the adopted Core Strategy.

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

2. Assessment of Focussed Changes 2011

- 2.1 The Core Strategy Focussed Review document proposes the review of two objectives, sets out two revised policies and one new policy. The SA process has considered and assessed all these focussed changes.
- 2.2 It should be noted that, for the revised policies and the new one, although the assessment has been undertaken for each individual policy, it has also taken into consideration all other Core Strategy policies that remain unchanged in the adopted Core Strategy 2008 to ensure a comprehensive assessment.
- 2.3 The assessment of the policies against the set SA Objectives utilises a five point scale as set out in Table 2.1 , which is consistent with the approach utilised for the production of the SA Report for the adopted Core Strategy 2008.

Table 2.1 - Preferred Site Proposals and Policies Assessment Scale

Assessment Scale	Assessment Category	Significance of Effect
++	Major positive	Significant
+	Minor positive	Not Significant
0	Neutral or no obvious effect	
-	Minor negative	
--	Major negative	Significant
? / +/-	Effect uncertain/ mixed	

- 2.4 Major positive and negative effects are considered of significance whereas neutral and minor positive and negative effects are considered non-significant.

3. Strategic Objectives

- 3.1 The adopted Core Strategy 2008 sets out 15 strategic objectives central to achieving the delivery of the spatial vision for Mid Suffolk. They are:
- SO 1 - To protect, manage, enhance and restore the landscape, biodiversity and geodiversity of the District.
 - SO 2 - To seek to improve water quality and reduce pollution to the wider environment.
 - SO 3 - To provide for sustainable development and respond to the implications of climate change reducing Mid Suffolk's carbon footprint.
 - SO 4 - To protect, manage, enhance and restore the historic heritage / environment and the unique character and identity of the towns and villages by ensuring that new developments are appropriate in terms of scale and location in the context of settlement form and character.
 - SO 5 – To reinforce the vitality and viability of local shops, schools, services, recreation and community facilities in towns and key service centres and primary villages.
 - SO 6 - Provision of housing, employment, retail, infrastructure and access to services will be coordinated to enable communities to be balanced, inclusive and prosperous.

- SO 7 - To support sustainable communities by locating development where it will enable people to access jobs and key services, such as education, health, recreation and other facilities recognising and respecting the diversity in the function and character of Mid Suffolk's towns, key service centres and primary and secondary villages and countryside.
- SO 8 - To meet the requirement set by the Regional Spatial Strategy for new housing while maintaining the special character of Mid Suffolk's towns, villages and countryside. New development will be of a high standard of design and layout and will address the need for energy and resource conservation.
- SO 9 - Planning and housing policies will maximise the provision of affordable housing to meet local needs.
- SO 10 - To prepare for an ageing population, including the provision and retention of community facilities and suitable housing, including sheltered and assisted accommodation.
- SO 11 - To support the growth of the local economy and rural regeneration in ways which are compatible with environmental objectives, and which deliver increased prosperity for the whole community.
- SO 12 – To promote high quality, sustainable tourism.
- SO 13 – To support and enable public and community transport services and encourage walking and cycling initiatives to provide access to jobs, shops and services and consider new methods of delivering and protecting existing services for smaller communities.
- SO 14 - To provide accessible and varied opportunities for leisure, cultural and recreational activities in order to promote healthy lifestyles.
- SO 15 - To develop vibrant and prosperous towns and service centres by encouraging development that supports their function with a range of good quality jobs, businesses, shops and services that meet the needs of local people.

3.2 The Council proposes that two Core Strategy objectives, namely SO3 and SO6, should be changed in order to, respectively:

- make a direct link between the need to locate new businesses and homes with transport infrastructure and services as part of their response to ensuring that all new development meets the challenges of climate change (Focussed Change FC2); and
- recognise the important relationship that exists in sustainable development between the delivery of growth and the delivery of infrastructure (Focussed Change FC3).

3.3 The compatibility of the proposed changes to the Core Strategy objectives has been checked against the SA objectives identified for Mid Suffolk shown below:

SOCIAL OBJECTIVES

- SA1. To improve the health of the population overall;
- SA2. To maintain and improve levels of education and skills in the population overall;
- SA3. To reduce crime and anti-social activity;
- SA4. To reduce poverty and social exclusion;
- SA5. To improve access to key services for all sectors of the population;
- SA6. To offer everybody the opportunity for rewarding and satisfying employment;
- SA7. To meet the housing requirements of the whole community;
- SA8. To improve the quality of where people live and to encourage community participation;

ENVIRONMENTAL OBJECTIVES

- SA9. To maintain and where possible improve water and air quality;
- SA10. To conserve soil resources and quality;
- SA11. To use water and mineral resources efficiently, and conserve, re-use and recycle where possible;
- SA12. To reduce waste;
- SA13. To reduce the effects of traffic on the environment;
- SA14. To reduce contributions to climate change;
- SA15. To reduce vulnerability to climatic events;
- SA16. To conserve and enhance biodiversity and geodiversity;
- SA17. To conserve and where appropriate enhance areas of historical and archaeological importance;
- SA18. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes;

ECONOMIC OBJECTIVES

- SA19. To achieve sustainable levels of prosperity and economic growth throughout the plan area;
- SA20. To revitalise town centres;
- SA21. To encourage efficient patterns of movement in support of economic growth; and
- SA22. To encourage and accommodate both indigenous and inward investment.

Focussed change FC 2

Core Strategy Objective SO3

~~To provide for sustainable development and respond to the implications of climate change, reducing Mid Suffolk's carbon footprint~~

Substitute

To respond to the implications of climate change, reducing Mid Suffolk's carbon footprint **by reducing traffic congestion and pollution and ensuring that all new development minimises carbon emissions, carbon consumption and is adapted to future climate change.**

Compatibility assessment results

- 3.4 The change of wording proposed by Council is in full alignment with the SA objectives that seek:
- To reduce contributions to climate change (ENV6) through requiring all new development to minimise carbon emissions and carbon consumption; and
 - To reduce the vulnerability of climatic events (ENV7) through requiring all new development to be adapted to future climate change.
- 3.5 The change represents an improvement to the wording of the approved CS Objective CSO3. The removal of the wording 'To provide for sustainable development' originally part of this objective is also supported by the sustainability appraisal as all strategic objectives are meant to provide for sustainable development in many different ways (not just CSO3). In addition, the new Sustainable

Development policy proposed as part of the Focussed Changes document sets out how these strategic objectives come together to deliver sustainable development in Mid Suffolk.

Focussed change FC3

Core Strategy Objective SO6

~~Provision of housing, employment, retail, infrastructure and access to services will be coordinated to enable communities to be balanced, inclusive and prosperous.~~

Substitute

Provision of housing, employment, retail, infrastructure and access to services will be coordinated to **ensure that delivery of necessary infrastructure takes place to accommodate new development** and to enable communities to be balanced, inclusive and prosperous.

Compatibility assessment results

- 3.6 The change of wording proposed by Council is generally aligned with SA objectives, although no particular SA objective specifically covers the issue of ensuring that adequate infrastructure is delivered to support growth.

4. New Policy on Mid Suffolk's Approach to Sustainable Development

- 4.1 The Council proposes the insertion of a new section at the beginning of Chapter 3 – Strategic Policies in Mid Suffolk's Adopted Core Strategy (2008) leading to a new overarching policy on sustainable development. This new policy is aimed at clarifying and interpreting the Mid Suffolk's approach to sustainable development, in the light of the draft National Planning Policy Framework (NPPF).

- 4.2 The draft NPPF requires local development plans to contain and adhere to the new presumption in favour of sustainable development, as follows:

"At the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking. Local planning authorities should plan positively for new development, and approve all individual proposals wherever possible. Local planning authorities should:

- prepare Local Plans on the basis that objectively assessed development needs should be met, and with sufficient flexibility to respond to rapid shifts in demand or other economic changes
- approve development proposals that accord with statutory plans without delay; and
- grant permission where the plan is absent, silent, indeterminate or where relevant policies are out of date.

All of these policies should apply unless the adverse impacts of allowing development would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole." [Source: draft NPPF, paragraphs 14-1]

- 4.3 At the time of writing this SA note, there is much controversy surrounding the proposals of the draft NPPF as there are fears that the document will undermine the planning system to the detriment of the environment and local communities and create significant gaps in planning policy.

The phrase 'sustainable development', which is key to the policy in the NPPF is viewed by certain quarters as a poorly defined, carrying the risk of the planning system being used to implement poorly planned, unsustainable development. It is therefore likely that the proposals in the draft NPPF will still evolve so that the planning system is to address social, environmental and economic demands on equal grounds at the local level.

Focussed Change FC1

Policy FC1 is aimed at putting the policies of the district's development plan at the heart of the local considerations that will apply in integrating the components of sustainable development, balancing the interests of an appropriate level of growth and the characteristics of Mid Suffolk. Its adoption will help to ensure that the Core Strategy and the SAAP are in conformity and will remain so following the introduction of the proposed new planning legislation.

Policy FC 1 Mid Suffolk approach to Sustainable Development

Development proposals will be required to demonstrate the principles of sustainable development and will be assessed against the presumption in favour of sustainable development as interpreted and applied locally to the Mid Suffolk context through the policies and proposals of the Mid Suffolk Development Plan.

Proposals for development must respect the local character of the different parts of the district. They should demonstrate how the proposal addresses the context and key issues of the district and contributes to meeting the objectives and policies of the Mid Suffolk Core Strategy.

The District Council encourages pre-application discussions and/or the use of development briefs and masterplans to address these principles prior to submitting planning applications. This approach is particularly relevant to the integration of the necessary physical, social and environmental infrastructure within development plans and proposals.

Assessment results

- 4.4 The results of the sustainability assessment of the new policy are presented in Table A.1 in Appendix A. The sustainability assessment focussed how the Core Strategy objectives and policies, interpreted as reflecting the principles of sustainable development for Mid Suffolk, deliver the Sustainability Appraisal framework objectives as set in section 2. The discussion below reflects the performance of the new policy.

Positive effects

- 4.5 Significant positive effects have been predicted against the all SA social objectives pertaining to improving the overall health of the population; improving education and skills; reducing crime and anti-social activity; reducing poverty and social exclusion; improving access to key services and facilities; increasing employment opportunities and meeting housing requirements.
- 4.6 Significant positive effects were also found for some environmental SA objectives such as using water and mineral resources effectively; recovering and recycling waste; reducing vulnerability to climatic events; reducing the effects of traffic on the environment; reducing contributions to climate change and the vulnerability to climatic events; conserving and enhancing historical and archaeological assets and landscapes and townscapes.
- 4.7 For the economic dimension of sustainable development, significant positive effects have been predicted against achieving sustainable levels of prosperity and economic growth; revitalising town centres; encouraging and accommodating both indigenous and inward investment and encouraging efficient patterns of movement to support economic growth.

Negative effects

4.8 No negative effects were predicted.

Summary of Sustainability Assessment

4.9 An assessment of the new policy predicted 27 major positive effects and 21 minor positive effects (Table 4.1).

4.10 This represents the delivery of significant positive effects against a very high number of the SA objectives which indicates that the policy will promote sustainable development. This is not surprising, as the primary aim of this policy is to steer the implementation of the other, more specific, Core Strategy policies towards a more sustainable path and to set out the overarching policy aims for sustainable development in Mid Suffolk.

4.11 Overall, the assessment shows that the introduction of the overarching Policy on Sustainable Development has beneficial effects which are likely to be observed through the implementation and enforcement of the rest of the Core Strategy Policies, and also of other local policy documents contained in Mid Suffolk Development Plan.

Table 4.1 – Assessment Summary of Sustainable Development Policy FC1

	Positive Effects	Uncertain Effects	Neutral Effects	Negative Effects
Social Objectives (26 in total)	+6 ++12	None	8 neutral (0)	None
Environmental Objectives (25 in total)	+12 ++12	None	1 neutral (0)	None
Economic Objectives (14 in total)	+5 ++4	None	5 neutral (0)	None

5. Amended Policy CS 8 on Housing

5.1 Having already established minimum housing requirements and the broad locations for the main housing allocations in the Core Strategy, the Council now needs to address those alterations that have been suggested by the more detailed work contained in the Stowmarket Area Action Plan. The Stowmarket green field allocation total in Policy CS 8 is to be increased by 485 homes (from 1,040 to 1,525).

5.2 Although the Core Strategy is in conformity with the Regional Spatial Strategy, which is to be abolished, the Regional Spatial Strategy is not the only basis for establishing future housing requirements and various other sources have been used as evidence for this update of the Core Strategy. These include the Stowmarket Masterplan, 2008, Strategic Housing Market Assessment (SHMA), Ipswich Housing Market Area, November 2008, and Strategic Housing Land Availability Assessment for Mid Suffolk, 2009 and 2010 update.

5.3 Monitoring past rates of development gives a realistic indication of what may be achieved in future. The Core Strategy housing provision is similar to the rates of housing development delivered over the previous 20 years. In the 10 year period 2001-2011 the annual average house completions for Mid Suffolk have been 420 per year. The Council has maintained its commitment to at least this level of building and wishes to take advantage of the additional development being proposed in Stowmarket.

- 5.4 The community-based approach of the Stowmarket Masterplan has added a “bottom-up” assessment to the process, with community involvement regarding sites, acceptable scale of development and local needs. The community aspirations for improving shops and the town centre has led to a regeneration programme, which is already underway, for new shops, homes, employment, infrastructure, transport improvements and affordable housing.
- 5.5 To clarify the number of the homes that will be proposed by the Stowmarket Area Action Plan and also to update estimates (to 2011) of potential housing on previously developed land, beyond existing commitments, to take account of recent planning permissions, additional sites and changes to site capacity, Policy CS8 will be amended as set out below (text in bold italics shows new additions, text stroked out shows deletions):

Amended Core Strategy Policy CS 8 Provision and Distribution of Housing

Provision is made for allocating greenfield sites for at least ~~2,432~~ **2,625** homes and associated infrastructure in Mid Suffolk over ~~the period up to 2025~~ **a 15 year period from the date of adoption.**

The release of land for housing will be phased to enable continuous delivery of housing for at least 15 years from the date of adoption and to ensure that priority is given to use of previously-developed land **where this is consistent with other sustainability considerations.**

The table below indicates the estimate of potential housing on previously developed land, updated to 2011, and the amount of housing on new allocations of green field land as “urban extensions”.

Years	YEARS 1-5		YEARS 5-10		YEARS 10-15		TOTAL	
	PDL	GF	PDL	GF	PDL	GF	PDL	GF
Stowmarket	300	300 600	100	400 525	0	340 400	400	1040 1,525*
Needham Market	180	0	480 140	0	0	150	360 320	150
Eye	80 30	0	0	100	0	100	80 30	200
Ipswich Policy Area	600 90	0	400 80	0	400 0	0	800 170	0
Key Service Centres	50 100	100	0 100	150	0 100	200	50 300	450
Primary Villages	0	100	0	100	0	100	0	300
Secondary Villages	0	0	0	0	0	0	0	0
Mid Suffolk Total	1210 700	500 800	380 420	750 875	100	890 950	1,600 1,220	2,140 2,625*

PDL = Previously developed land
GF = Green field allocation

*** The Stowmarket green field allocation total has been increased by 485 (from 1,040 to 1,525) following detailed work on the capacity of sites in the preparation of the Stowmarket**

area action plan. This has produced an updated and realistic assessment of housing potential, which builds on the earlier regionally minimum figures.

Estimates of potential housing on previously developed land, beyond existing commitments, have been updated to 2011, to take account of recent planning permissions, additional sites and changes to site capacity estimates.

Assessment Results

- 5.6 The results of the detailed assessment of the proposed Submission focussed changes to Policy CS8 are presented in Table A2 in Appendix A. The discussion below reflects the sustainability performance of the submission version of the focussed changes to Policy CS8.

Positive Effects

- 5.7 Positive effects have been mainly predicted with regard to the Social and Economic Objectives. Specifically, the provision of new development in towns and key centres is likely to improve access to key services and facilities, including health facilities, schools, employment, retail and community facilities. The amended policy allows for more housing development overall, which is in line with the Strategic Housing Market Assessment and should help meet the local needs for housing. The higher overall housing numbers proposed in the focussed change will help deliver more affordable housing, meeting the needs of those who cannot afford market prices. In addition some areas in Stowmarket are more deprived compared to the rest of Mid Suffolk, therefore, directing new development towards these areas is likely to stimulate regeneration opportunities and, thus, contribute to reducing poverty and social exclusion.
- 5.8 New development is likely to result in more private car use due to prevailing cultural preferences. However, directing more new development to Stowmarket (as opposed to smaller settlements) may help promote the use of public transport and non-motorised forms of travelling, as the SAAP aims to provide new bus services and improve walking and cycling routes.
- 5.9 Allocating new housing development in towns and key centres and an increase of the proposed development in Stowmarket will help ensure good accessibility to the existing and new employment opportunities within the District and would help reduce commuting. Finally, new development is likely to be of high quality and supported by improvements to the infrastructure, increasing general attractiveness of the District's main settlements for potential investors.

Negative Effects

- 5.10 Negative effects or a mixture of positive and negative effects have been predicted against the SA environmental objectives pertaining to the conservation of soil resources and quality, biodiversity, historic and archaeological assets, reduction of the emissions of greenhouse gases and vulnerability to climatic events. This is explained by the fact that sheer volume of new development that needs to be delivered during the Core Strategy period and the need for a land take of Greenfield land has implications in terms of a loss of the best and most versatile agricultural land, an increase in resource consumption levels and pressures placed on ecosystem services and the natural and heritage assets.
- 5.11 Most negative effects identified as a result of the assessment can be minimised to a satisfactory degree through the effective joint implementation of all the Core Strategy policies, in particular those setting out environmental safeguards, e.g. Policy CS 3 - Reduce contributions to Climate Change and Policy CS 5 - Mid Suffolk's Environment.

Summary of Sustainability Appraisal Results

- 5.12 The focussed changes to policy CS8 are predicted to result in five major positive effects, eighteen minor positive effects, one mixed effect and eleven minor negative effects (Table 5.1).

- 5.13 The table below also provides a comparison between the summary of appraisal results for Policy CS8 as in the adopted Core Strategy and for the Focussed Change proposed to Policy CS8.
- 5.14 It should be noted that this comparison is made for illustration purposes only and should not be treated as a precise 'one to one' comparison. This is because when the assessment was undertaken in 2007, there were more uncertainties regarding new development. More evidence base has been made available since then, which allowed for a more thorough approach and higher level of certainty to be attached to the predictions for the focussed change. The previous assessment of Policy CS8 in the adopted Core Strategy has been included in Appendix B for reference purposes.

Table 5.1 – Assessment Summary of Focussed Change to Policy CS8

	Positive Effects		Uncertain Effects		Neutral Effects		Negative Effects	
	Policy 2008	Focussed Change	Policy 2008	Focussed Change	Policy 2008	Focussed Change	Policy 2008	Focussed Change
Social Objectives (26 in total)	+3 ++1	+10 ++3			22 neutral (0)	11 neutral (0)		-1
Environmental Objectives (25 in total)	+4	+5		+/-3	20 neutral (0)	4 neutral (0)	-1	-13
Economic Objectives (14 in total)	+2 ++1	+3 ++2			11 neutral (0)	9 neutral (0)		

- 5.15 Overall, there has been an improvement of the sustainability of the policy from a social and economic perspective with an increase in the total number of minor positive and significant positive effects.
- 5.16 The situation with regards to the environmental objectives has become more negative, as a consequence of an increase in housing numbers to be allocated on Greenfield land, potentially impacting on a number of environmental assets. However, all effects are deemed non-significant and can be mitigated.

6. Amended Policy CS11 on Employment

- 6.1 The adopted Core Strategy set out the spatial plan for the district's employment growth, which focussed on six existing locations close to the district's three towns Eye, Needham Market and Stowmarket, plus Great Blakenham on the fringes of Ipswich, Woolpit Business Park in the west and the old airfield at Mendlesham. This was considered to provide good geographical coverage for a wide variety of employment uses close to accessible trunk roads, existing infrastructure and centres of population. Major growth was expected to be in Stowmarket and in locations close to Ipswich in the Ipswich Policy Area (IPA).
- 6.2 The Western Suffolk Employment Land Review (ELR) received in 2009 confirmed the 6 broad locations as set out in the Core Strategy as the most appropriate to employment growth in Mid Suffolk and that Stowmarket and the IPA should take the major share of growth for the district.
- 6.3 The ELR indicates that strategic growth for the district should be focused on locations adjacent to the A14 at Junction 50 in Stowmarket and (at Junction 52) in the Ipswich Policy Area, where the main drivers for growth have the greatest influence. It also recommends that growth in other locations will be important to meet the needs of local markets but should not be promoted for strategic growth.

- 6.4 The East of England Forecasting Model (EEFM) forecasts a need for Mid Suffolk of 8,000 jobs in all use classes by 2026 and 11,000 jobs by 2031 creating a shortfall of 5,152 jobs in Mid Suffolk from the forecast need of 8,000 jobs by 2026 and a shortfall of 8,252 jobs below forecasted need by 2031.
- 6.5 In order to meet the jobs target of 8,000 by 2026 the Council proposes a focussed change to Policy CS11 to set a target for the district of at least 8,000 jobs in the plan period of 2026 with an indicative total of at least 11,000 jobs for 2031. The primary focus will be a major allocation at Stowmarket Mill Lane including 39.5Ha of employment land to provide an estimated 3,395 jobs in a range of Use Classes over the 15 years of the plan to 2026 and a much smaller allocation at Chilton Fields also in Stowmarket.
- 6.6 The adopted Policy CS11 will be updated as set out below, which removes references to RSS and outdated evidence bases, incorporates a jobs target for the District and a revised table incorporating the proposed allocation at Mill Lane (text in bold italics shows new additions, text stroked out shows deletions).

Amended Core Strategy Policy CS 11 Supply of Employment Land

Provision will be made for development that aims to deliver at least 8,000 additional jobs in the district by 2026 and 11,100 jobs by 2031. These targets include jobs in all Use-Classes.

To help meet this target and contribute to an overall package of sustainable development for Stowmarket, a new site will be allocated in the Stowmarket Area Action Plan at Mill Lane to provide a mix of uses amounting to 39.5 hectares of employment and 39.5 hectares of leisure, recreation and amenity areas with associated green and built infrastructure.

The employment areas will be predominantly in the B-Use Classes and delivered in phases in line with the details of the proposed development set out in the Stowmarket Area Action Plan and supporting site masterplan.

The availability of land and the jobs capacity of existing allocations is set out in a Table at the end of this policy.

~~We will provide sufficient good quality employment land between 2001—2021 to meet the indicative targets for additional jobs in Mid Suffolk set out in the East of England Plan. These target numbers and the sectoral requirements will be further defined through a revised Employment Land Review for the District prepared under the written guidance produced by East of England Development Agency, East of England Regional Assembly, and Government Office for the East of England and produced in conjunction with the other districts in the ‘rest of Suffolk’ (Western Suffolk) group identified in the East of England Plan. The revised Employment Land Review will also consider the role of Mid Suffolk in meeting the aims and objectives of the Regional Employment Strategy and East of England Plan and in particular the needs of the Haven Gateway Partnership and accommodating any development associated with the expansion of the port of Felixstowe.~~

In addition a range of good quality sites and premises will be made available for employment land in all towns and at least some of the Key Service Centres through:

1. Policies to protect existing employment sites from inappropriate loss to other ***inappropriate*** uses,
2. Designation of existing employment sites where ~~the revised Employment Land Review shows~~ ***there is evidence*** that the site continues to meet the future needs of business .
3. Support for uprating existing sites where this is practicable
4. The allocation of new employment sites to increase choice and to achieve a better balance between employment and housing for each settlement.

Major new allocations of employment land should be situated primarily in or close to towns and Key Service Centres with good access to the District's major transport routes, good access by public transport; and where the location and proposed use **is consistent with the Western Suffolk Employment Land Review, other relevant evidence** and the environmental and other policies of the ~~Core Strategy~~ **Mid Suffolk Development Plan**.

Employment sites may be allocated to other settlements where they cannot be accommodated on other identified employment land owing to environmental and operational requirements.

In employment areas identified on Proposal Maps only employment generating development in Use Classes B1, B2 and B8 will normally be permitted. Other commercial uses may be permitted where there is no sequentially preferable site available.

~~Pending the publication of the 'rest of Suffolk' (Western Suffolk) Employment Land Review, the Council will give priority to the expansion, updating and intensification of employment uses on existing sites allocated in the Local Plan (1998) and listed in the table below, where this is likely to meet the needs of business with least environmental and social impact.~~

~~The current distribution and availability of employment land on sites allocated in the Local Plan or considered in both the Haven Gateway and the draft Mid Suffolk Employment Land Studies (**) is set out below:–~~

~~**Three sites included in the original studies are omitted because they are the subject of applications.~~

~~One site is omitted because the level of contamination makes it unlikely to come forward in the plan period.~~

The Council will give priority to the expansion, updating and intensification of employment uses on allocated sites and listed in the table below, where this is likely to meet the needs of business with least environmental and social impact.

The current distribution, availability and capacity of employment land is set out below:

Area	Site	Total Vacant Land 2011	Land fully Available To Developers 2011	Use	Availability	Quality Rating	Previously Developed Land (PDL)	Job Nos
A14 corridor								
Ipswich Policy Area	Orion Business Park	2.57	1.4	B1, B2, B8	N/A	Medium	Greenfield	84
Needham Market	Lion Barn Ext	0	0		Short Term	Good	Greenfield	0
Stowmarket	Cedars Park	(10.9)	10.9	B1, B2, B8	Immediately Short Term	Good	Greenfield	567
	Mill Lane Phase 1	29.5	0	B1, B2, B8	Short to Medium Term		Greenfield	2,535
	Mill Lane Phase 2	10.0	0		Long Term		Greenfield	860
	Chilton Fields	2.14	0	B1, B8	Short Term		Greenfield	114
Woolpit	Woolpit Business Park	(1.06)	1.06	B1, B2,	Short Term	Medium	PDL	100
A140 Corridor								
Mendlesham	Airfield A	(5.5)	0	B1, B2, B8	Short Term	Medium	PDL	275
	Airfield B	(8.0)		B8	Short Term	Medium	PDL	
Eye	Airfield	(1.34)	1.34	B1, B2, B8	Medium Term	Medium	PDL	80
	Airfield Ind Est	(4.82)		B1, B2, B8	Short Term	Medium	PDL	
	Brome Triangle	(2.02)		B1	Immediately	Good	Greenfield	
TOTAL		(33.21) (68.18)	14.7				59% PDL PDL	4,926

Rural Economy

In rural areas we will support economic development proposals, including tourism and farm diversification proposals that cannot be more sustainably located closer to existing settlements and where the proposal is restricted in size, scale and type appropriate to a rural setting.

Assessment Results

- 6.7 The results of the detailed assessment of the proposed focussed changes to Policy CS11 are presented in Table A3 in Appendix A. The discussion below reflects the sustainability performance of the submission version of the focussed changes to Policy CS11.

Positive Effects

- 6.8 Positive effects focus on the Social and Economic Objectives and include enhanced opportunities to encourage healthy lifestyles, improve levels of education and skills in the population together with corresponding effects on poverty and crime. Reduced overall unemployment levels and long term unemployment as well as improved access to key services are seen as major positive effects. The proposals are also likely to provide job opportunities for those most in need of employment.
- 6.9 In relation to economic objectives it is likely that the proposals will have a major effect on the availability of land for business and will contribute to business development and enhanced competitiveness and to the resilience of business and the economy. The amended Policy will also make a positive contribution to economic growth throughout the plan area, encourage efficient patterns of movement in support of economic growth and encourage inward investment. The policy also has the potential to contribute towards the revitalisation of town centres.

Negative Effects

- 6.10 The proposed developments at Mill Lane, Chilton Fields, Orion Business Park, Lion Barn and Cedars Park are located on previously undeveloped Greenfield Land, part of which is best and most versatile agricultural land and, therefore, significant negative effects likely to arise.

Development will also result in the loss of accessible open green space to some extent. The increase in employment opportunities is likely to result in minor effects relating to increased localised traffic levels and an increased need for local travel. This will in turn lead to increased CO₂ emissions together with other traffic related pollutants. The developments also have the potential for increased noise and odour, potential to affect sites designed for their nature conservation and Biodiversity Action Plan (BAP) species that inhabit land allocated for new development. The proposed development may also affect areas of historical, archaeological or geological importance.

Summary of Sustainability Appraisal Results

- 6.11 The results predicted two major negative effects, twelve minor negative effects, fourteen major positive effects and seventeen positive effects relating to the amendment of Policy CS11 (see Table 6.1).
- 6.12 The table below also provides a comparison between the summary of appraisal results for Policy CS11 as in the adopted Core Strategy and for the Focussed Change proposed to Policy CS11.
- 6.13 Similarly to the focussed change on housing, it should be noted that this comparison is made for illustration purposes only and should not be treated as a precise 'one to one' comparison. This is because when the assessment was undertaken in 2007, there were more uncertainties regarding new development. More evidence base has been made available since then, which allowed for a more thorough approach and higher level of certainty to be attached to the predictions for the focussed change. The previous assessment of Policy CS11 in the adopted Core Strategy has been included in Appendix B for reference purposes.

Table 6.1 – Assessment Summary of Focussed Change to Policy CS11

	Positive Effects		Uncertain Effects		Neutral Effects		Negative Effects	
	Policy 2008	Focussed Change	Policy 2008	Focussed Change	Policy 2008	Focussed Change	Policy 2008	Focussed Change
Social Objectives (26 in total)		+ 9 ++ 5	Positive +2; Uncertain 6; Positive/ uncertain/ negative 2		16 neutral (0)	11 neutral (0)		- 1
Environmental Objectives (25 in total)		+ 3	Positive/negative 1; Uncertain 2; negative 1	+/-2	18 neutral (0)	7 neutral (0)	-3	- 11 -- 2
Economic Objectives (14 in total)	+ 3 ++ 3	+ 5 ++ 6	Positive/ Negative +1; uncertain 3		4 neutral (0)	2 neutral (0)		-1

- 6.14 Overall, there has been an improvement of the sustainability of the policy from a social and economic perspective with an increase in the total number of minor positive and significant positive effects.
- 6.15 The situation with regards to the environmental objectives has become more negative, as a consequence of the substantial increase in employment land allocations potentially impacting on a number of environmental assets as discussed above, but most effects are deemed non-significant. Those that have been identified as significant can be minimised to a satisfactory degree through the effective joint implementation of all the Core Strategy policies, in particular

those setting out environmental safeguards, e.g. Policy CS 3 - Reduce contributions to Climate Change and Policy CS 5 - Mid Suffolk's Environment.

7. References

- Core Strategy Development Plan Document, September 2008;
- Core Strategy Habitats Regulations Assessment, October 2007;
- Core Strategy Focussed Changes Habitats Regulations Assessment, December 2010;
- Stowmarket Area Action Plan Development Plan Document Sustainability Appraisal Report, May 2011;
- Stowmarket Area Action Plan Proposed Submission, April 2010;
- Stowmarket Masterplan, 2008;
- Strategic Housing Land Availability Assessment for Mid Suffolk, 2009 and 2010 update;
- Strategic Housing Market Assessment, Ipswich Housing Market Area, November 2008;
- Sustainability Appraisal of Core Strategy Development Plan Document, October 2007;
- Western Suffolk Employment Land Review 2009.

Appendix A – 2011 Assessment Tables

Table A.1 – Assessment of Policy FC1: Mid Suffolk approach to Sustainable Development

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	Rating	Commentary
SOCIAL			
S1 To improve the health of the population overall	1.1 Will it improve access to high quality, health facilities?	+	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO7 and policy CS6 (Services and Infrastructure) is likely to deliver improved access to health facilities but it is not possible to ascertain whether these will be of high quality.
	1.2 Will it reduce death rates?	0	No obvious effects.
	1.3 Will it encourage healthy lifestyles?	++	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objectives SO13 and SO14 and policy CS6 (Services and Infrastructure) is likely to encourage healthy lifestyles.
S2 To maintain and improve levels of education and skills in the population overall	2.1 Will it improve qualifications and skills of young people?	+	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO7 and policy CS6 (Services and Infrastructure) may deliver improved qualifications and skills of young people.
	2.2 Will it improve qualifications and skills of adults?	++	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO7 and policy CS6 (Services and Infrastructure) may deliver improved qualifications and skills of adults.
S3 To reduce crime and anti-social activity	3.1 Will it reduce actual levels of crime?	0	Crime is not specifically addressed by the Core Strategy objectives and policies.
	3.2 Will it reduce the fear of crime?	0	Fear of crime is not addressed by the Core Strategy objectives and policies.
	3.3 Will it reduce noise and odour concerns?	++	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with Objective SO2 and policy CS4 (Adapting to Climate Change) will address this particular concern.
S4 To reduce poverty and social exclusion	4.1 Will it reduce poverty and social exclusion in those areas most affected?	++	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with Objectives SO9, SO11 and SO15 and policies CS8 (Provision and Distribution of Housing) and CS11 (Supply of Employment Land) will make an effective contribution in reducing poverty and social exclusion. Pre-application discussions and/or the use of development briefs and masterplans to address this issue prior to submitting planning applications will be most beneficial.

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	Rating	Commentary
S5 To improve access to key services for all sectors of the population	5.1 Will it improve accessibility to key local services?	++	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objectives SO5, SO7, SO13 and SO15 and policy CS6 (Services and Infrastructure) will improve access to key local services. Pre-application discussions and/or the use of development briefs and masterplans to address this issue prior to submitting planning applications will be most beneficial.
	5.2 Will it improve accessibility to shopping facilities?	++	See the commentary above.
	5.3 Will it improve access to childcare?	++	See the commentary above.
S6 To offer everybody the opportunity for rewarding and satisfying employment	6.1 Will it reduce unemployment overall?	++	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objectives SO5, SO6, SO7 and SO15 and policies CS6 (Services and Infrastructure), CS11 (Supply of Employment Land) and CS12 (Retail Provision) is likely to help reduce unemployment overall. Pre-application discussions and/or the use of development briefs and masterplans to address this issue prior to submitting planning applications will be most beneficial.
	6.2 Will it reduce long-term unemployment?	+	See the commentary above but the link with long-term unemployment may not be tangible.
	6.3 Will it provide job opportunities for those most in need of employment?	0	No obvious effects.
	6.4 Will it help to improve earnings?	+	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objectives SO6 and SO15 and policies CS6 (Services and Infrastructure), CS11 (Supply of Employment Land) and CS12 (Retail Provision) may help improve earnings.
S7 To meet the housing requirements of the whole community	7.1 Will it reduce homelessness?	+	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objectives SO6 and SO15 and policies CS1 (Settlement Hierarchy), CS2 (Development in the Countryside and Countryside Villages), CS8 (Provision and Distribution of Housing) and CS9 (Density and Mix) may help achieve this.
	7.2 Will it provide enough housing?	++	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objectives SO6 and SO15 and policies CS1 (Settlement Hierarchy), CS2 (Development in the Countryside and Countryside Villages), CS8 (Provision and Distribution of Housing) and CS9 (Density and Mix) will ensure enough housing is provided. Pre-application discussions and/or the use of development briefs and masterplans to address this issue prior to submitting planning applications will be most beneficial.
	7.3 Will it increase the range and affordability of housing for all social groups?	++	See the commentary above.
	7.4 Will it reduce the number of unfit homes?	0	No obvious effects.

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	Rating	Commentary
S8 To improve the quality of where people live and to encourage community participation	8.1 Will it improve the satisfaction of people with their neighbourhood as a place to live?	+	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objectives SO6, SO7 and SO8 will help achieve this plus many CS policies may help achieve this.
	8.2 Will it increase access to natural green space?	++	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO14 and policy CS5 (Mid Suffolk Environment) will help increase access to natural green space.
	8.3 Will it encourage engagement in decision-making?	0	No obvious effects.
	8.4 Will increase the number of people involved in volunteer activities?	0	No obvious effects.
	8.5 Will it improve ethnic relations?	0	No obvious effects.
	8.6 Will it improve access to cultural facilities?	++	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO14 and policy CS5 (Mid Suffolk's Environment) will help achieve this. Pre-application discussions and/or the use of development briefs and masterplans to address this issue prior to submitting planning applications will be most beneficial.
ENVIRONMENTAL			
ENV 1 To maintain and where possible improve water and air quality	1.1 Will it improve the quality of inland waters?	+	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO2 and policy CS5 (Mid Suffolk's Environment) will help improve the quality of inland waters.
	1.2 Will it improve air quality	+	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO2 and policy CS5 (Mid Suffolk's Environment) will help improve air quality.
ENV 2 To conserve soil resources and quality	2.1 Will it minimize the loss of greenfield land to development?	+	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO1 and policy CS5 (Mid Suffolk's Environment) and CS7 (Brownfield Target) may help minimise the loss of greenfield land..
	2.2 Will it minimize loss of the best and most versatile agricultural land to development?	+	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO1 and policy CS7 (Mid Suffolk's Environment) and CS7 (Brownfield Target) may help minimise the loss of the best and most versatile agricultural land.
	2.3 Will it maintain and enhance soil quality?	+	See the commentary above.
ENV 3 To use water and mineral resources	3.1 Will it promote sustainable use of minerals?	+	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO8 and policy CS3 (Reduce Contributions to Climate Change) may help achieve this.

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	Rating	Commentary
efficiently, and re-use and recycle where possible	3.2 Will it promote sustainable use of water?	++	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO8 and policy CS3 (Reduce Contributions to Climate Change) may help achieve this.
	3.3 Will it maintain water availability for water dependant habitats?	0	No obvious effects.
ENV 4 To reduce waste	4.1 Will it reduce household waste?	+	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO2 and policies CS3 (Reduce Contributions to climate Change) and CS6 (Services and Infrastructure) may help achieve this.
	4.2 Will it increase waste recovery and recycling?	++	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO2 and policies CS3 (Reduce Contributions to climate Change) and CS6 (Services and Infrastructure) will help achieve this.
ENV 5 To reduce the effects of traffic on the environment	5.1 Will it effect traffic volumes?	++	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO2 and policies CS3 (Reduce Contributions to climate Change) and CS6 (Services and Infrastructure) will help achieve this.
	5.2 Will it reduce the need for local travel?	++	See the commentary above
	5.3 Will it increase the proportion of journeys made using modes other than the private car?	++	See the commentary above.
ENV 6 To reduce contributions to climate change	6.1 Will it reduce emissions of greenhouse gases by reducing energy consumption?	+	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO3 and policies CS3 (Reduce Contributions to climate Change) and CS6 (Services and Infrastructure) may help achieve this..
	6.2 Will it increase the proportion of energy needs being met by renewable sources?	++	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO8 and policies CS1(Settlement Hierarchy) and CS3 (Reduce Contributions to Climate Change) will help achieve this. Pre-application discussions and/or the use of development briefs and masterplans to address this issue prior to submitting planning applications will be most beneficial.
ENV 7 To reduce vulnerability to climatic events	7.1 Will it minimize the risk of flooding to people and property from rivers and watercourses?	++	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objectives SO3 and policy CS4 (Adapting to Climate Change) will help achieve this.
	7.2 Will it reduce the risk of damage to people and property from storm events?	++	See the commentary above.
ENV 8 To conserve and enhance biodiversity	8.1 Will it maintain and enhance sites designated for their nature conservation interest?	+	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO1 and policy CS5 (Mid Suffolk's Environment) will help achieve this.

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	Rating	Commentary
and geodiversity	8.2 Will it help deliver the targets and actions for habitats and species within the Suffolk Biodiversity Action Plan?	+	See commentary above.
	8.3 Will it help to reverse the national decline in farmland birds?	+	See commentary above.
ENV 9 To conserve and where appropriate enhance areas of historical and archaeological importance	9.1 Will it protect and enhance sites, features and areas of historical and cultural value in both urban and rural areas?	++	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO4 and policy CS5 (Mid Suffolk's Environment) will help achieve this. Pre-application discussions and/or the use of development briefs and masterplans to address this issue prior to submitting planning applications will be most beneficial.
	9.2 Will it protect and enhance sites, features and areas of archaeological value in both urban and rural areas?	+	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO4 and policy CS5 (Mid Suffolk's Environment) may help achieve this.
	9.3 Will it protect and enhance sites, features and areas of geological value in both urban and rural areas?	++	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO4 and policy CS5 will help achieve this .
ENV 10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	10.1 Will it reduce the amount of derelict, degraded and underused land?	++	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO1 and policies CS5 (Mid Suffolk's Environment) and CS7 (Brownfield Target) will help achieve this
	10.2 Will it improve the landscape and/or townscape?	++	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO1 and policy CS5 (Mid Suffolk's Environment) will help achieve this
ECONOMIC			
Ec 1 To achieve sustainable levels of prosperity and economic growth throughout the plan area	1.1 Will it improve business development and enhance competitiveness?	+	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objectives SO5, SO6, SO13, SO15 and policies CS8 and CS15 may help improve business development and enhance competitiveness.
	1.2 Will it improve the resilience of business and the economy?	+	See above
	1.3 Will it promote growth in key sectors?	0	No obvious effects.
	1.4 Will it improve economic performance in advantaged and disadvantaged areas?	0	No obvious effects.
	1.5 Will it encourage rural diversification?	+	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO11 and policies CS8 and CS11 will encourage rural diversification.

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	Rating	Commentary
Ec 2 To revitalize town centres	2.1 Will it increase the range of employment opportunities, shops and services available in town centres?	++	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO5 and policies CS8 (Provision and Distribution of Housing) and CS11 (Supply of Employment Land) will help achieve this. Pre-application discussions and/or the use of development briefs and masterplans to address this issue prior to submitting planning applications will be most beneficial.
	2.2 Will it decrease the number of vacant units in town centres?	0	No obvious effects.
Ec 3 To encourage efficient patterns of movement in support of economic growth	3.1 Will it reduce commuting?	++	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objectives SO7 and SO13 and policies CS8 (Provision and Distribution of Housing) and CS11 (Supply of Employment Land) will help achieve this. Pre-application discussions and/or the use of development briefs and masterplans to address this issue prior to submitting planning applications will be most beneficial.
	3.2 Will it improve accessibility to work by public transport, walking and cycling?	++	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO13 and policies CS8 (Provision and Distribution of Housing) and CS11 (Supply of Employment Land) will help achieve this. Pre-application discussions and/or the use of development briefs and masterplans to address this issue prior to submitting planning applications will be most beneficial.
	3.3 Will it increase the proportion of freight transported by rail or other sustainable modes?	0	No obvious effects.
	3.4 Will it increase the consumption of locally produced food and good?	0	No obvious effects.
Ec 4 To encourage and accommodate both indigenous and inward investment	4.1 Will it encourage indigenous business?	+	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objectives SO6 and SO15 and policy CS11 (Supply of Employment Land) may encourage indigenous business.
	4.2 Will it encourage inward investment?	+	As above.
	4.3 Will it make land available for business development?	++	The new policy requires that development proposals meet the Core Strategy objectives and policies. Compliance with objective SO6 and policy CS11 (Supply of Employment Land) will help achieve this. Pre-application discussions and/or the use of development briefs and masterplans to address this issue prior to submitting planning applications will be most beneficial.

Table A.2 – Assessment of Focussed Changes to Policy CS8 Provision and Distribution of Housing

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	Rating	Commentary
SOCIAL			
S1 To improve the health of the population overall	1.1 Will it improve access to high quality, health facilities?	+	Development in towns and key centres more likely to improve access to health services.
	1.2 Will it reduce death rates?	0	No obvious effects.
	1.3 Will it encourage healthy lifestyles?	+	Increasing allocation of development in Stowmarket may help encourage healthy lifestyles, as the SAAP aims to improve opportunities for walking and cycling in the town. Therefore, it may be easier for new residents in the town to uptake physically active forms of transport benefitting their health.
S2 To maintain and improve levels of education and skills in the population overall	2.1 Will it improve qualifications and skills of young people?	+	The amended policy allows for more development in Stowmarket. In the SAAP the Infrastructure Delivery Programme includes proposals for education contributions and provision of a new school. This should ensure good access to education and help maintain and improve levels of education.
	2.2 Will it improve qualifications and skills of adults?	+	Allocating more new housing development in Stowmarket with the simultaneous allocation of more employment land around the town may help retain local skills.
S3 To reduce crime and anti-social activity	3.1 Will it reduce actual levels of crime?	+	The amended policy allows for more development in Stowmarket, where the provision of new community facilities is planned as part of the new development around Chilton Leys. This may help prevent anti-social behaviour. Other development areas in Stowmarket should allow good access to the existing facilities.
	3.2 Will it reduce the fear of crime?	0	No obvious effects.
	3.3 Will it reduce noise and odour concerns?	-	Some noise concerns may arise as part of proposed new development in Stowmarket is located adjacent to the A14. However, the SAAP requires the consideration of noise attenuation, which should help mitigate this impact.
S4 To reduce poverty and social exclusion	4.1 Will it reduce poverty and social exclusion in those areas most affected?	++	Scope for additional housing to help reduce social exclusion. Allocating new development in Stowmarket near deprived areas (e.g. Poplar Hill area) should help stimulate regeneration opportunities and contribute to this SA objective. The higher overall housing numbers will also help deliver more affordable housing, meeting the needs of those who can't afford market prices.

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	Rating	Commentary
S5 To improve access to key services for all sectors of the population	5.1 Will it improve accessibility to key local services?	+	Concentrating development in larger centres will ensure easier access to key services.
	5.2 Will it improve accessibility to shopping facilities?	+	The amended policy allows for more development in Stowmarket, Mid Suffolk's principal town, which provides good access to shopping facilities. In addition, the SAAP promotes further retail development.
	5.3 Will it improve access to childcare?	0	No obvious effects.
S6 To offer everybody the opportunity for rewarding and satisfying employment	6.1 Will it reduce unemployment overall?	+	Allocating more new housing development in Stowmarket will help ensure good accessibility to the existing and new employment opportunities within the town.
	6.2 Will it reduce long-term unemployment?	0	See the commentary above but the link with long-term unemployment may not be tangible.
	6.3 Will it provide job opportunities for those most in need of employment?	0	No obvious effects.
	6.4 Will it help to improve earnings?	0	No obvious effects.
S7 To meet the housing requirements of the whole community	7.1 Will it reduce homelessness?	0	
	7.2 Will it provide enough housing?	++	The amended policy allows for more housing development overall, which is in line with the Strategic Housing Market Assessment and should help meet the local needs for housing.
	7.3 Will it increase the range and affordability of housing for all social groups?	++	Caters for housing needs in villages
	7.4 Will it reduce the number of unfit homes?	-	Renewal and improvement of the existing unfit stock is not addressed in the Policy and nowhere else in the Core Strategy but this also a way of providing new homes.
S8 To improve the quality of where people live and to encourage community participation	8.1 Will it improve the satisfaction of people with their neighbourhood as a place to live?	+	As new development will be expected to provide contributions towards infrastructure provision or improvements, including public realm improvements, leisure facilities etc, this may increase residents' satisfaction with their neighbourhoods.
	8.2 Will it increase access to natural green space?	0	Open space provision is identified as one of the key infrastructure provisions as part of new development but is not covered by this policy. Open space provision is dealt with through Policy CS6 Services and Infrastructure.
	8.3 Will it encourage engagement in decision-making?	0	No obvious effects.
	8.4 Will it increase the number of people involved in volunteer activities?	0	No obvious effects.
	8.5 Will it improve ethnic relations?	0	No obvious effects.

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	Rating	Commentary
	8.6 Will it improve access to cultural facilities?	+	As new development will be expected to provide contributions towards infrastructure provision or improvements, including cultural facilities, this may deliver benefits against the objective.
ENVIRONMENTAL			
ENV 1 To maintain and where possible improve water and air quality	1.1 Will it improve the quality of inland waters?	-	New development will increase hard surfacing, giving rise to polluted run-off and impacting the water cycle. However, these effects are likely to be minimised due to the requirement to implement SUDS in all new developments where technically feasible (through Policy CS4).
	1.2 Will it improve air quality	-	New development is likely to result in more car use, which may have minor effects on local air quality. However, these effects are likely to be minimised due to the support of public transport and other sustainable transport modes,
ENV 2 To conserve soil resources and quality	2.1 Will it minimize the loss of greenfield land to development?	-	The amended policy allows for 485 more houses on green field sites and none on PDL thereby not satisfying this assessment criterion. The policy does state that priority will be given to use PDL where this is consistent with other sustainability considerations, but nevertheless all new proposed development in Stowmarket will be in green field sites.
	2.2 Will it minimize loss of the best and most versatile agricultural land to development?	--	Village/local needs housing may use green field land. The amended policy allows a higher release of Greenfield land around Stowmarket, which will result in a larger loss of the best and most versatile agricultural land. Preserving soil resources, in particular of high quality, is important for ensuring the area's resilience to changes in natural and socio-economic systems.
	2.3 Will it maintain and enhance soil quality?	-	The amended policy allows a higher release of Greenfield land around Stowmarket. This may lead to the loss of high quality soil. Higher level of development will also increase hard surfacing which will increase a rate of polluted run-off. However, these effects are likely to be minimised due to the requirement to implement SUDS in all new developments where technically feasible (through Policy CS4).
ENV 3 To use water and mineral resources efficiently, and re-use and recycle where possible	3.1 Will it promote sustainable use of minerals?	0	No obvious effects. Policy CS 3 addresses this through the requirement for the Code for Sustainable Homes.
	3.2 Will it promote sustainable use of water?	0	No obvious effects. Policy CS 3 addresses this through the requirement for the Code for Sustainable Homes.
	3.3 Will it maintain water availability for water dependant habitats?	0	The 2007 Core Strategy HRA indicated a possibility of change in water supply to groundwater-fed fen systems (Redgrave and South Lopham Fens – Ramsar site) but the CS Focussed Changes HRA concluded that the proposed changes will have no likely significant effects on any Nature 2000 site based on the lack of any direct hydrological connectivity between the Redgrave and South Lopham Fen Ramsar site and Stowmarket.

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	Rating	Commentary
ENV 4 To reduce waste	4.1 Will it reduce household waste?	-	New development will elevate the level of waste arisings in Mid Suffolk.
	4.2 Will it increase waste recovery and recycling?	+	The requirement for the provision of adequate infrastructure for the recycling of waste through the adherence to the Code for Sustainable Homes in Policy CS 3 should help mitigate an increase in waste arisings by promoting recycling.
ENV 5 To reduce the effects of traffic on the environment	5.1 Will it effect traffic volumes?	+/-	New development is likely to result in more private car use due to prevailing cultural preferences. However, directing more new development to Stowmarket (as opposed to smaller settlements) may help promote the use of public transport and non-motorised forms of travelling as an alternative to a private car.
	5.2 Will it reduce the need for local travel?	+	Scope for shorter journeys and alternatives to car use in larger centres. Directing more new development to the principal town may provide further scope for shorter journeys and the use of sustainable modes.
	5.3 Will it increase the proportion of journeys made using modes other than the private car?	+	Directing more new development to Stowmarket should help promote the use of sustainable modes, as it is planned to provide new bus services and improve walking and cycling routes there.
ENV 6 To reduce contributions to climate change	6.1 Will it reduce emissions of green house gases by reducing energy consumption?	-/+	New development will elevate energy consumption. However, Policy CS 3 requires that from 2013 all new development achieve a minimum of Level 4 Code for Sustainable Homes (25% improvement in CO ₂ emissions over Target Emission Rate), and from 2016 all new development achieve a minimum of Level 6 (zero carbon). This will contribute to minimising CO ₂ emissions.
	6.2 Will it increase the proportion of energy needs being met by renewable sources?	+	As new development will have to adhere to the increasingly tightened Code for Sustainable Homes, which promotes the use of local renewable or low carbon energy sources, this should help deliver benefits against this objective.
ENV 7 To reduce vulnerability to climatic events	7.1 Will it minimize the risk of flooding to people and property from rivers and watercourses?	-	New development will increase hard surfacing, giving rise to elevated levels of run-off and increasing risk of localised flooding. However, these effects are likely to be minimised due to the requirement to implement SUDS in all new developments where technically feasible; and to use a risk based sequential approach to steering development away from flood risk zones (as per Policy CS4).
	7.2 Will it reduce the risk of damage to people and property from storm events?	0	No obvious effects.

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	Rating	Commentary
ENV 8 To conserve and enhance biodiversity and geodiversity	8.1 Will it maintain and enhance sites designated for their nature conservation interest?	-	New development is likely to cause direct and indirect impacts on the local wildlife through land take disturbance caused by noise and recreational activities, etc. The 2007 HRA identified potential for negative effects on Redgrave and South Lopham Fens – Ramsar site, as a result of change in water supply to groundwater-fed fen systems and increased recreational pressure causing damage due to trampling / fire. The CS Focussed Changes HRA concluded that the proposed changes will have no likely significant effects on any Nature 2000 site based on the lack of any direct hydrological connectivity between the Redgrave and South Lopham Fen Ramsar site and Stowmarket, and the relatively low additional increase in housing numbers above that agreed in the Core Strategy, which will not be substantial enough to lead to significant additional visitor disturbance to the Stour and Orwell Estuaries Special Protection Area (SPA).
	8.2 Will it help deliver the targets and actions for habitats and species within the Suffolk Biodiversity Action Plan?	-	There is scope for BAP species to inhabit Greenfield or even Brownfield land allocated for new development. Potential negative effects should be minimised through the implementation of Policy CS 5 which includes safeguards for BAP species. This issue needs to be carefully addressed at the lower tier documents level – Site Allocations and AAP DPDs and as part of the project level planning application.
	8.3 Will it help to reverse the national decline in farmland birds?	-	Effects similar to those identified above.
ENV 9 To conserve and where appropriate enhance areas of historical and archaeological importance	9.1 Will it protect and enhance sites, features and areas of historical and cultural value in both urban and rural areas?	-	New development may affect sites, features and areas of historical and cultural value or their settings. Potential negative effects should be minimised through the implementation of Policy CS 5 which includes safeguards for Historic Environment. This issue needs to be carefully addressed at the lower tier documents level – Site Allocations and AAP DPDs and as part of the project level planning application.
	9.2 Will it protect and enhance sites, features and areas of archaeological value in both urban and rural areas?	-	New development may affect sites, features and areas of archaeological value. Potential negative effects should be minimised through the implementation of Policy CS 5 which includes safeguards for Historic Environment, including the residual archaeological remains.
	9.3 Will it protect and enhance sites, features and areas of geological value in both urban and rural areas?	-	Development of Greenfield sites may affect sites, features and areas of geological value. Potential negative effects should be minimised through the implementation of Policy CS 5 which includes geodiversity safeguards. This issue needs to be carefully addressed at the lower tier documents level – Site Allocations and AAP DPDs and as part of the project level planning application.
ENV 10 To conserve and	10.1 Will it reduce the amount of derelict, degraded and underused land?	+	There will be use of brown field and green field sites potentially degraded and underused.

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	Rating	Commentary
enhance the quality and local distinctiveness of landscapes and townscapes	10.2 Will it improve the landscape and/or townscape?	+/-	New development delivered to high quality design standards, incorporating public realm improvements, green infrastructure and other improvements should help improve the townscape. Negative impacts on the landscape should be minimised through the implementation of Policy CS 5 which includes landscape safeguards.
ECONOMIC			
Ec 1 To achieve sustainable levels of prosperity and economic growth throughout the plan area	1.1 Will it improve business development and enhance competitiveness?	+	Meeting local housing needs in towns and villages will help to support the urban and rural economy in the District.
	1.2 Will it improve the resilience of business and the economy?	0	No obvious effects.
	1.3 Will it promote growth in key sectors?	0	No obvious effects.
	1.4 Will it improve economic performance in advantaged and disadvantaged areas?	0	No obvious effects.
	1.5 Will it encourage rural diversification?	0	No obvious effects.
Ec 2 To revitalize town centres	2.1 Will it increase the range of employment opportunities, shops and services available in town centres?	+	Allows for housing and population growth in larger centres, which will support the provision of services and retail opportunities in town centres.
	2.2 Will it decrease the number of vacant units in town centres?	0	No obvious effects.
Ec 3 To encourage efficient patterns of movement in support of economic growth	3.1 Will it reduce commuting?	++	Development in larger centres allows for shorter journeys and alternatives to car use. Directing more development towards Stowmarket will help stimulate the development of efficient movement patterns.
	3.2 Will it improve accessibility to work by public transport, walking and cycling?	++	Directing more new development to Stowmarket should help promote the use of sustainable modes, as it is planned to provide new bus services and improve walking and cycling routes there.
	3.3 Will it increase the proportion of freight transported by rail or other sustainable modes?	0	No obvious effects.
	3.4 Will it increase the consumption of locally produced food and good?	0	No obvious effects.
Ec 4 To encourage and accommodate both indigenous and inward investment	4.1 Will it encourage indigenous business?	0	No obvious effects.
	4.2 Will it encourage inward investment?	+	New development is likely to be of high quality and supported by improvements to the infrastructure, increasing general attractiveness of the District's main settlements for potential investors.
	4.3 Will it make land available for business development?	0	No obvious effects.

Table A.3 – Assessment of Focussed Changes to Policy CS11 Supply of Employment Land

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	Rating	Commentary
SOCIAL			
S1 To improve the health of the population overall	1.1 Will it improve access to high quality, health facilities?	0	No obvious effects.
	1.2 Will it reduce death rates?	0	No obvious effects.
	1.3 Will it encourage healthy lifestyles?	+	Employment sites in Stowmarket, including that at Mill Lane, will be linked with public transport, cycle and pedestrian networks. This is likely to have a positive effect on promoting population health through the protection of existing air quality and the provision of opportunities for exercise.
S2 To maintain and improve levels of education and skills in the population overall	2.1 Will it improve qualifications and skills of young people?	+	The provision of a range of employment opportunities and jobs in all Use-Classes is likely to have a positive effect on levels of skills in Mid Suffolk and in particular in Stowmarket given the sizeable employment opportunities being created.
	2.2 Will it improve qualifications and skills of adults?	+	
S3 To reduce crime and anti-social activity	3.1 Will it reduce actual levels of crime?	+	The provision of a range of new employment opportunities is likely to have a positive effect on reducing crime and anti-social activity through opportunities to alleviate boredom and the use of wages to elevate standards of living.
	3.2 Will it reduce the fear of crime?	+	
	3.3 Will it reduce noise and odour concerns?	-	Employment developments have the potential to increase noise and odour concerns.
S4 To reduce poverty and social exclusion	4.1 Will it reduce poverty and social exclusion in those areas most affected?	+	The provision of a range of employment opportunities is likely to have a positive effect on reducing poverty through increased opportunities to earn a wage. Allocating new employment in Stowmarket near the most deprived area of Poplar Hill should help reduce poverty and social exclusion in that area.
S5 To improve access to key services for all sectors of the population	5.1 Will it improve accessibility to key local services?	++	New employment sites in Stowmarket will be required to be developed with appropriate links to public transport, cycle and pedestrian networks, thus improving access to key services and shopping facilities.
	5.2 Will it improve accessibility to shopping facilities?	++	
	5.3 Will it improve access to childcare?	0	No obvious effect.
S6 To offer everybody the opportunity for rewarding and satisfying employment	6.1 Will it reduce unemployment overall?	++	The provision of a range of new employment opportunities is likely to have a strong positive effect on unemployment.
	6.2 Will it reduce long-term unemployment?	++	
	6.3 Will it provide job opportunities for those most in need of employment?	++	

	6.4 Will it help to improve earnings?	+	The provision of a range of employment opportunities is likely to have a positive effect through providing increased opportunities to earn a wage.
S7 To meet the housing requirements of the whole community	7.1 Will it reduce homelessness?	0	No obvious effects.
	7.2 Will it provide enough housing?	0	Increased employment opportunities will be directly linked to increased housing provision and the provision of job opportunities close to homes but no provision of housing under this policy
	7.3 Will it increase the range and affordability of housing for all social groups?	0	No obvious effects. See above.
	7.4 Will it reduce the number of unfit homes?	0	No obvious effects. See above.
S8 To improve the quality of where people live and to encourage community participation	8.1 Will it improve the satisfaction of people with their neighbourhood as a place to live?	+	Provision of high quality employment opportunities will promote the regeneration of town and village centres, thus having likely positive effects on improving the quality of where people live.
	8.2 Will it increase access to natural green space?	+	Proposed Mill Lane development in Stowmarket is on greenfield land and will be accompanied by 39.5 Ha of environmental, recreation and strategic landscaping belts thus increasing the amount of natural green space available in Stowmarket.
	8.3 Will it encourage engagement in decision-making?	0	No obvious effects.
	8.4 Will increase the number of people involved in volunteer activities?	0	No obvious effects.
	8.5 Will it improve ethnic relations?	0	No obvious effects.
	8.6 Will it improve access to cultural facilities?	0	No obvious effects.
ENVIRONMENTAL			
ENV 1 To maintain and where possible improve water and air quality	1.1 Will it improve the quality of inland waters?	-	New development will increase hard surfacing, giving rise to polluted run-off and impacting the water cycle. However, these effects are likely to be minimised due to the requirement to implement SUDS in all new developments where technically feasible (through Policy CS4).
	1.2 Will it improve air quality	-	The SAAP promotes the use of more sustainable modes of transport, thus encouraging a reduction in air pollution. However, the level of development proposed is likely to result in an increase in traffic levels and possible deterioration of air quality.
ENV 2 To conserve soil resources and quality	2.1 Will it minimize the loss of greenfield land to development?	--	The amended policy allows for substantial employment development on greenfield land including development on Mill Lane, Chilton Fields, Orion Business Park, Lion Barn and Cedars Park.
	2.2 Will it minimize loss of the best and most versatile agricultural land to development?	--	The amended policy allows for a higher release of greenfield land around Stowmarket which will result in a larger loss of the best and most versatile agricultural land. Preserving soil resources, in particular of high quality, is important for ensuring the area's resilience to changes in natural and socio-economic systems.

	2.3 Will it maintain and enhance soil quality?	-	The amended policy allows a higher release of Greenfield land around Stowmarket. This may lead to the loss of high quality soil. Higher level of development will also increase hard surfacing which will increase a rate of polluted run-off. However, these effects are likely to be minimised due to the requirement to implement SUDS in all new developments where technically feasible (through Policy CS4).
ENV 3 To use water and mineral resources efficiently, and re-use and recycle where possible	3.1 Will it promote sustainable use of minerals?	0	No obvious effects. Policy CS3 addresses this through the requirement for sustainable construction measures for non-residential developments over 1,000 m ² .
	3.2 Will it promote sustainable use of water?	0	No obvious effects. Policy CS3 addresses this through the requirement for sustainable construction measures for non-residential developments over 1,000 m ² .
	3.3 Will it maintain water availability for water dependant habitats?	0	No obvious effects.
ENV 4 To reduce waste	4.1 Will it reduce household waste?	0	No obvious effects.
	4.2 Will it increase waste recovery and recycling?	0	
ENV 5 To reduce the effects of traffic on the environment	5.1 Will it effect traffic volumes?	+/-	New employment development is likely to result in more private car use due to prevailing cultural differences. The SAAP includes requirements that employment sites are developed with appropriate links to public transport, cycle and pedestrian networks, thus seeking to reduce traffic levels. However, the level of employment development proposed is likely to result in a net increase in traffic levels
	5.2 Will it reduce the need for local travel?	+	Scope for shorter journeys and alternatives to car use in/close to employment areas through appropriate links to public transport, cycle and pedestrian networks and co-location of housing and employment.
	5.3 Will it increase the proportion of journeys made using modes other than the private car?	+	
ENV 6 To reduce contributions to climate change	6.1 Will it reduce emissions of green house gases by reducing energy consumption?	-	The provision of employment sites which are integrated with the local public transport, pedestrian and cycle networks and which seek to reduce energy consumption and use of the private car will be promoted. However, despite this, the level of development proposed is likely to result in an increase in greenhouse gas emissions.
	6.2 Will it increase the proportion of energy needs being met by renewable sources?	0	No obvious effects. New policy on Sustainable Development advocates the use or generation of renewable or low carbon energy and Policy CS3 requires proposals for non-residential development over 1,000 m ² to provide at least 10% of their energy requirements from renewable energy.

ENV 7 To reduce vulnerability to climatic events	7.1 Will it minimize the risk of flooding to people and property from rivers and watercourses?	-	New development will increase hard surfacing, giving rise to elevated levels of run-off and increasing risk of localised flooding. However, these effects are likely to be minimised due to the requirement to implement SUDS in all new developments where technically feasible; and to use a risk based sequential approach to steering development away from flood risk zones (as per Policy CS4).
	7.2 Will it reduce the risk of damage to people and property from storm events?	0	No obvious effects.
ENV 8 To conserve and enhance biodiversity and geodiversity	8.1 Will it maintain and enhance sites designated for their nature conservation interest?	-	The south western edge of the Mill Lane site lies within 1 km of Combs Wood SSSI and is 500 m from a County Wildlife Site, Local Nature Reserve or Ancient Woodland. The following protected species have been found on site: Brown hare (<i>Lepus europaeus</i>) Common lizard (<i>Lacerta vivipara</i>), Slow-worm (<i>Anguis fragilis</i>) and there is potential for Water vole (<i>Arvicola terrestris</i>). The creation of a wetland area as part of the site development proposals will help minimise any potential effects.
	8.2 Will it help deliver the targets and actions for habitats and species within the Suffolk Biodiversity Action Plan?	-	There is scope for BAP species to inhabit Greenfield or even Brownfield land allocated for new development. Potential negative effects should be minimised through the implementation of Policy CS 5 which includes safeguards for BAP species. This issue needs to be carefully addressed at the lower tier documents level – Site Allocations and AAP DPDs and as part of the project level planning application.
	8.3 Will it help to reverse the national decline in farmland birds?	-	Effects similar to those identified above.
ENV 9 To conserve and where appropriate enhance areas of historical and archaeological importance	9.1 Will it protect and enhance sites, features and areas of historical and cultural value in both urban and rural areas?	-	New development may affect sites, features and areas of historical and cultural value or their settings. Potential negative effects should be minimised through the implementation of Policy CS 5 which includes safeguards for Historic Environment. This issue needs to be carefully addressed at the lower tier documents level – Site Allocations and AAP DPDs and as part of the project level planning application.
	9.2 Will it protect and enhance sites, features and areas of archaeological value in both urban and rural areas?	-	New development may affect sites, features and areas of archaeological value. Potential negative effects should be minimised through the implementation of Policy CS 5 which includes safeguards for Historic Environment, including the residual archaeological remains.
	9.3 Will it protect and enhance sites, features and areas of geological value in both urban and rural areas?	-	Development of Greenfield sites may affect sites, features and areas of geological value. Potential negative effects should be minimised through the implementation of Policy CS 5 which includes geodiversity safeguards. This issue needs to be carefully addressed at the lower tier documents level – Site Allocations and AAP DPDs and as part of the project level planning application.
ENV 10 To conserve and enhance	10.1 Will it reduce the amount of derelict, degraded and underused land?	+	There will be use of brown field and green field sites potentially degraded and underused.

the quality and local distinctiveness of landscapes and townscapes	10.2 Will it improve the landscape and/or townscape?	+/-	New development delivered to high quality design standards, incorporating public realm improvements, green infrastructure and other improvements should help improve the townscape. Negative impacts on the landscape should be minimised through the implementation of Policy CS 5 which includes landscape safeguards.
ECONOMIC			
Ec 1 To achieve sustainable levels of prosperity and economic growth throughout the plan area	1.1 Will it improve business development and enhance competitiveness?	++	Provision of a range of high quality employment opportunities in a variety of sectors will promote economic growth.
	1.2 Will it improve the resilience of business and the economy?	++	Provision of a range of high quality employment opportunities in a variety of sectors will improve the resilience of business and the economy.
	1.3 Will it promote growth in key sectors?	++	Development of the Mill Lane site will be able to support the growth of the Port of Felixstowe, therefore supporting sectors such as logistics, transport and distribution.
	1.4 Will it improve economic performance in advantaged and disadvantaged areas?	+	Allocating new employment in Stowmarket near the most deprived area of Poplar Hill area should help improve economic performance in disadvantaged as well as advantage areas.
	1.5 Will it encourage rural diversification?	+	Support is provided in the policy for economic development proposals, including tourism and farm diversification proposals that cannot be more sustainably located closer to existing settlements and where the proposal is restricted in size, scale and type appropriate to a rural setting.
Ec 2 To revitalize town centres	2.1 Will it increase the range of employment opportunities, shops and services available in town centres?	++	Provision of high quality employment opportunities will promote the regeneration of town and some Key Service centres..
	2.2 Will it decrease the number of vacant units in town centres?	-	Potential increase in vacant units if business moves out of town to new developments.
Ec 3 To encourage efficient patterns of movement in support of economic growth	3.1 Will it reduce commuting?	+	The proposed development will provide local jobs thus reducing the demand for 'out' commuting.
	3.2 Will it improve accessibility to work by public transport, walking and cycling?	+	Directing more new business development to Stowmarket should help promote the use of sustainable transport modes, as it is planned to provide new bus services and improve walking and cycling routes there.
	3.3 Will it increase the proportion of freight transported by rail or other sustainable modes?	0	No obvious effects.
	3.4 Will it increase the consumption of locally produced food and good?	0	No obvious effects.
Ec 4 To encourage and accommodate both indigenous and inward investment	4.1 Will it encourage indigenous business?	+	The proposed Mill Lane site in Stowmarket will allow for expansion and relocation of larger existing employers in the town should it be necessary.
	4.2 Will it encourage inward investment?	++	Provision of high quality employment opportunities will promote the regeneration of town and village centres, thus creating more attractive areas for inward investment.
	4.3 Will it make land available for business development?	++	The proposed Mill Lane site in Stowmarket will make a substantial quantity of land (39.5 Ha) available for business development.

Appendix B – 2007 Assessment Tables for Policies CS8 and CS11

Table B.1 – CS8 Provision and Distribution of Housing (2007)

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	Rating	Comment
SOCIAL			
S1 To improve the health of the population overall	1.1 Will it improve access to high quality, health facilities?	+	Development in towns and key centres more likely to improve access to health services
	1.2 Will it reduce death rates?	0	
	1.3 Will it encourage healthy lifestyles?	0	
S2 To maintain and improve levels of education and skills in the population overall	2.1 Will it improve qualifications and skills of young people?	0	
	2.2 Will it improve qualifications and skills of adults?	0	
S3 To reduce crime and anti-social activity	3.1 Will it reduce actual levels of crime?	0	
	3.2 Will it reduce the fear of crime?	0	
	3.3 Will it reduce noise and odour concerns?	0	
S4 To reduce poverty and social exclusion	4.1 Will it reduce poverty and social exclusion in those areas most affected?	+	Scope for additional housing to help reduce social exclusion
S5 To improve access to key services for all sectors of the population	5.1 Will it improve accessibility to key local services?	+	Development in larger centres will have access to shops and key services
	5.2 Will it improve accessibility to shopping facilities?	0	
	5.3 Will it improve access to childcare?	0	
S6 To offer everybody the opportunity for rewarding and satisfying employment	6.1 Will it reduce unemployment overall?	0	
	6.2 Will it reduce long-term unemployment?	0	
	6.3 Will it provide job opportunities for those most in need of employment?	0	
	6.4 Will it help to improve earnings?	0	
S7 To meet the housing requirements of the whole community	7.1 Will it reduce homelessness?	0	
	7.2 Will it provide enough housing?	0	
	7.3 Will it increase the range and affordability of housing for all social groups?	++	Caters for housing needs in villages
	7.4 Will it reduce the number of unfit homes?	0	

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	Rating	Comment
S8 To improve the quality of where people live and to encourage community participation	8.1 Will it improve the satisfaction of people with their neighbourhood as a place to live?	0	
	8.2 Will it increase access to natural green space?	0	
	8.3 Will it encourage engagement in decision-making?	0	
	8.4 Will increase the number of people involved in volunteer activities?	0	
	8.5 Will it improve ethnic relations?	0	
	8.6 Will it improve access to cultural facilities?	0	
ENVIRONMENTAL			
ENV 1 To maintain and where possible improve water and air quality	1.1 Will it improve the quality of inland waters?	0	
	1.2 Will it improve air quality	0	
ENV 2 To conserve soil resources and quality	2.1 Will it minimize the loss of greenfield land to development?	+	Most brown field sites are in towns
	2.2 Will it minimize loss of the best and most versatile agricultural land to development?	-	Village/local needs housing may use green field land
	2.3 Will it maintain and enhance soil quality?	0	
ENV 3 To use water and mineral resources efficiently, and re-use and recycle where possible	3.1 Will it promote sustainable use of minerals?	0	
	3.2 Will it promote sustainable use of water?	0	
	3.3 Will it maintain water availability for water dependant habitats?	0	
ENV 4 To reduce waste	4.1 Will it reduce household waste?	0	
	4.2 Will it increase waste recovery and recycling?	0	
ENV 5 To reduce the effects of traffic on the environment	5.1 Will it effect traffic volumes?	0	
	5.2 Will it reduce the need for local travel?	+	Scope for shorter journeys and alternatives to car use in larger centres
	5.3 Will it increase the proportion of journeys made using modes other than the private car?	0	
ENV 6 To reduce contributions to climate change	6.1 Will it reduce emissions of green house gases by reducing energy consumption?	0	
	6.2 Will it increase the proportion of energy needs being met by renewable sources?	0	

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	Rating	Comment
ENV 7 To reduce vulnerability to climatic events	7.1 Will it minimize the risk of flooding to people and property from rivers and watercourses?	0	
	7.2 Will it reduce the risk of damage to people and property from storm events?	0	
ENV 8 To conserve and enhance biodiversity and geodiversity	8.1 Will it maintain and enhance sites designated for their nature conservation interest?	0	
	8.2 Will it help deliver the targets and actions for habitats and species within the Suffolk Biodiversity Action Plan?	0	
	8.3 Will it help to reverse the national decline in farmland birds?	+	Opportunities for development to avoid green field sites, apart from local needs housing in villages
ENV 9 To conserve and where appropriate enhance areas of historical and archaeological importance	9.1 Will it protect and enhance sites, features and areas of historical and cultural value in both urban and rural areas?	0	
	9.2 Will it protect and enhance sites, features and areas of archaeological value in both urban and rural areas?	0	
	9.3 Will it protect and enhance sites, features and areas of geological value in both urban and rural areas?	0	
ENV 10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	10.1 Will it reduce the amount of derelict, degraded and underused land?	+	Use of brown field sites in towns
	10.2 Will it improve the landscape and/or townscape?	0	
ECONOMIC			
Ec 1 To achieve sustainable levels of prosperity and economic growth throughout the plan area	1.1 Will it improve business development and enhance competitiveness?	++	Meeting local housing needs in villages will help to support the rural economy
	1.2 Will it improve the resilience of business and the economy?	0	
	1.3 Will it promote growth in key sectors?	0	
	1.4 Will it improve economic performance in advantaged and disadvantaged areas?	0	
	1.5 Will it encourage rural diversification?	0	

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	Rating	Comment
Ec 2 To revitalize town centres	2.1 Will it increase the range of employment opportunities, shops and services available in town centres?	+	Allows for housing and population growth in larger centres
	2.2 Will it decrease the number of vacant units in town centres?	0	
Ec 3 To encourage efficient patterns of movement in support of economic growth	3.1 Will it reduce commuting?	+	Development in larger centres allows for shorter journeys and alternatives to car use
	3.2 Will it improve accessibility to work by public transport, walking and cycling?	0	
	3.3 Will it increase the proportion of freight transported by rail or other sustainable modes?	0	
	3.4 Will it increase the consumption of locally produced food and good?	0	
Ec 4 To encourage and accommodate both indigenous and inward investment	4.1 Will it encourage indigenous business?	0	
	4.2 Will it encourage inward investment?	0	
	4.3 Will it make land available for business development?	0	

Table B.2 – CS11 Employment² (2007)

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	Rating	Comment
SOCIAL			
S1 To improve the health of the population overall	1.1 Will it improve access to high quality, health facilities?	0	
	1.2 Will it reduce death rates?	?/+	Allowing the placing of businesses dependant on frequent HGV journeys onto trunk road sites and away from both population centres and rural roads has obvious road safety benefits. Some encouragement for rural development in the policy may increase lorry and van traffic on rural roads but policy to limit scale and size will control usage and there is currently no data on whether this would have a significant effect on deaths and serious injuries.

² Numbered as CS12 at the time of the assessment in 2007

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	Rating	Comment
	1.3 Will it encourage healthy lifestyles?	?/-/+	Towns and key service centres tend to be more accessible by foot or cycle so spreading employment development across the district might well reduce the journeys by foot or cycle. However there is also the question of employment for local people who can now walk or cycle to work rather than travel to remote centres. So the likelihood and degree of any effect is less certain
S2 To maintain and improve levels of education and skills in the population overall	2.1 Will it improve qualifications and skills of young people?	0	
	2.2 Will it improve qualifications and skills of adults?	0	
S3 To reduce crime and anti-social activity	3.1 Will it reduce actual levels of crime?	0	
	3.2 Will it reduce the fear of crime?	0	
	3.3 Will it reduce noise and odour concerns?	?	Depends on the employment use and how close employment sites are located to residential properties (and vice versa). The effect, if any, is so dependant on individual circumstances that it is difficult to make a clear statement
S4 To reduce poverty and social exclusion	4.1 Will it reduce poverty and social exclusion in those areas most affected?	?	Increasing the accessibility of employment locally may help take rural households out of benefit but effect depends on reasons for household being on benefit and suitability of employment offered.
S5 To improve access to key services for all sectors of the population	5.1 Will it improve accessibility to key local services?	?/-/+	Potential for some indirect positive effects on the viability of rural services if local jobs are (a) protected, and (b) not transferred primarily to towns and a few key villages. Protecting existing sites reinforces travel patterns and helping retention of bus routes, but conversely potential to decrease viability of bus services if remote workers no longer obliged to travel to towns and KSC for work.
	5.2 Will it improve accessibility to shopping facilities?	0	
	5.3 Will it improve access to childcare?	0	
S6 To offer everybody the opportunity for rewarding and satisfying employment	6.1 Will it reduce unemployment overall?	?/+	Protecting existing viable employment sites for employment use will be generally beneficial as will facilitating upgrading to meet changing needs Also depends on matching skills required and skills offered. May have particular positive effect on remote rural areas
	6.2 Will it reduce long-term unemployment?	?	Protecting existing viable employment sites for employment use will be generally beneficial as will facilitating upgrading to meet changing needs Also depends on matching skills required and skills offered. May have particular positive effect on remote rural areas
	6.3 Will it provide job opportunities for those most in need of employment?	?	The focus on towns and other centres of population is most likely to enhance accessibility and opportunities for a majority of this group while controlled expansion of jobs in remote locations will benefit rural economy without prejudicing environment..

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	Rating	Comment
	6.4 Will it help to improve earnings?	?	Not necessarily for individuals but may help town and rural households if viable existing jobs are protected short term and long term opportunity is enabled through up-to-date employment land review. Dispersal of jobs to rural areas should bring more people into employment. Realising opportunity may require educational and other non-planning inputs
S7 To meet the housing requirements of the whole community	7.1 Will it reduce homelessness?	0	
	7.2 Will it provide enough housing?	0	
	7.3 Will it increase the range and affordability of housing for all social groups?	0	
	7.4 Will it reduce the number of unfit homes?	0	
S8 To improve the quality of where people live and to encourage community participation	8.1 Will it improve the satisfaction of people with their neighbourhood as a place to live?	?	Depends on the exact location of the employment and housing sites and the exact details of the development
	8.2 Will it increase access to natural green space?	0	
	8.3 Will it encourage engagement in decision-making?	0	
	8.4 Will increase the number of people involved in volunteer activities?	0	
	8.5 Will it improve ethnic relations?	0	
	8.6 Will it improve access to cultural facilities?	0	
ENVIRONMENTAL			
ENV 1 To maintain and where possible improve water and air quality	1.1 Will it improve the quality of inland waters?	0	
	1.2 Will it improve air quality	0	
ENV 2 To conserve soil resources and quality	2.1 Will it minimize the loss of greenfield land to development?	?/-	Protecting existing employment sites may reduce brownfield land availability – but this is not necessarily a bad thing.
	2.2 Will it minimize loss of the best and most versatile agricultural land to development?	?	Rural development can put best agricultural land at risk – must be protected in farm diversification policy
	2.3 Will it maintain and enhance soil quality?	0	
ENV 3 To use water and mineral resources efficiently, and re-use and recycle where possible	3.1 Will it promote sustainable use of minerals?	0	
	3.2 Will it promote sustainable use of water?	0	
	3.3 Will it maintain water availability for water dependant habitats?	0	
ENV 4	4.1 Will it reduce household waste?	0	

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	Rating	Comment
To reduce waste	4.2 Will it increase waste recovery and recycling?	0	
ENV 5 To reduce the effects of traffic on the environment	5.1 Will it effect traffic volumes?	0	(Only A14 monitored and greatest effect is from Port related activities elsewhere)
	5.2 Will it reduce the need for local travel?	?	Retaining existing employment sites and therefore travel patterns and incomes may have a beneficial effect for retention of services and facilities – but the effect is not certain. Focusing new employment development more widely may have long-term beneficial effects on rural services. However the effect is not certain and need to support services in largest settlements, ie scale of development should be appropriate to location
	5.3 Will it increase the proportion of journeys made using modes other than the private car?	-/+	Walking, cycling and public transport tends to evolve around existing employment patterns and protecting existing sites protects these patterns. Some sites will be located away from towns and villages most accessible by walking, cycling and public transport. Traffic generating development should be in larger settlements more easily served by sustainable means
ENV 6 To reduce contributions to climate change	6.1 Will it reduce emissions of green house gases by reducing energy consumption?	-	Increase in employment floorspace will tend to increase power consumption
	6.2 Will it increase the proportion of energy needs being met by renewable sources?	0	
ENV 7 To reduce vulnerability to climatic events	7.1 Will it minimize the risk of flooding to people and property from rivers and watercourses?	0	
	7.2 Will it reduce the risk of damage to people and property from storm events?	0	
ENV 8 To conserve and enhance biodiversity and geodiversity	8.1 Will it maintain and enhance sites designated for their nature conservation interest?	0	
	8.2 Will it help deliver the targets and actions for habitats and species within the Suffolk Biodiversity Action Plan?	0	
	8.3 Will it help to reverse the national decline in farmland birds?	0	
ENV 9 To conserve and where appropriate enhance areas of historical and archaeological importance	9.1 Will it protect and enhance sites, features and areas of historical and cultural value in both urban and rural areas?	0	
	9.2 Will it protect and enhance sites, features and areas of archaeological value in both urban and rural areas?	0	

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	Rating	Comment
	9.3 Will it protect and enhance sites, features and areas of geological value in both urban and rural areas?	0	
ENV 10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	10.1 Will it reduce the amount of derelict, degraded and underused land?	-	Potentially reduces the competition between jobs and housing for brownfield sites in towns and KSC villages and other parts of the district
	10.2 Will it improve the landscape and/or townscape?	-	Depends on actual locations and the size, scale and designs of development in more rural areas. Any employment development anywhere carries this potential
ECONOMIC			
Ec 1 To achieve sustainable levels of prosperity and economic growth throughout the plan area	1.1 Will it improve business development and enhance competitiveness?	+	While protecting existing sites is beneficial where they are appropriately located it should also be recognised that new employment provision may be better both in terms of location as well as quality of facilities and encourage take-up and appropriate new development will tend to increase permissions. Probably positive through widening the range and choice of provision in a wider spread of locations but this is dependant on locating new development in less accessible areas only according to evidence of need and demand rather than speculatively. Some new provision may be taken by expansion of existing or substitution one for another through "churn"
	1.2 Will it improve the resilience of business and the economy?	+	Allocating existing viable sites and discouraging change of use to residential will reduce pressure for closure. New land availability and updated premises offered will tend to promote start ups, especially if new development in less accessible areas is according to evidence of need and demand rather than speculatively Unclear whether increase in service jobs will outweigh decline in Agriculture and Manufacturing and effect depends on density of new or expanded employment compared to existing. (See Ec6)
	1.3 Will it promote growth in key sectors?	0	Not currently monitored
	1.4 Will it improve economic performance in advantaged and disadvantaged areas?	0	Not currently monitored
	1.5 Will it encourage rural diversification?	+	Focus on towns and key service centres only, is certain to be detrimental to employment provision in more rural areas but obvious positive effect from protecting existing sites and farm diversification policy.
Ec 2 To revitalize town centres	2.1 Will it increase the range of employment opportunities, shops and services available in town centres?	0	

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	Rating	Comment
	2.2 Will it decrease the number of vacant units in town centres?	?	Vacant units (6%) currently well below national average (11%) and justifies the protection of existing sites. Businesses in remote locations should be additional to those in town centres not substitutes. Policy is aimed at B1, 2, 8 uses both within and outside of town centres.
Ec 3 To encourage efficient patterns of movement in support of economic growth	3.1 Will it reduce commuting?	?/+	Focusing development in dispersed locations creates opportunity to reduce journeys for the rural population. The picture is complicated by out commuting/in commuting and reverse commuting to rural areas and the overall effect could be negative unless dispersed employment is additional to, not instead of employment in centres and where this will satisfy additional local demand
	3.2 Will it improve accessibility to work by public transport, walking and cycling?	?	Focusing development in wider locations could reduce sustainability of journeys over the medium/long term, unless the remoter locations are additional to those in centres and respond to local need/demand.. In the short term the picture is complicated by out commuting/in commuting and reverse commuting from rural areas if policy is detrimental to rural employment.
	3.3 Will it increase the proportion of freight transported by rail or other sustainable modes?	0	
	3.4 Will it increase the consumption of locally produced food and good?	0	Difficult to monitor – temp permissions and no requirement for planning permission to sell local produce
Ec 4 To encourage and accommodate both indigenous and inward investment	4.1 Will it encourage indigenous business?	++	New and uprated employment facilities in good locations, widening scope of provision should attract enquiries,
	4.2 Will it encourage inward investment?	++	New and uprated employment facilities in good locations, widening scope of provision should attract enquiries,
	4.3 Will it make land available for business development?	++	Obvious positive effect from allocating existing sites as well as new though this must await revised ELR and will take time to materialize on the ground

