

**Babergh District Council
Local Development Framework**

Submission Core Strategy

**Proposed Further Main Modifications following the Babergh District Council
Core Strategy Examination March 2013**

**Sustainability Appraisal Addendum
and
Habitats Regulation Assessment Review**

May 2013

1. Purpose of the document

- 1.1** The aim of sustainability appraisal is to promote sustainable development by ensuring environmental, social and economic factors are considered during plan preparation. It is a statutory requirement stemming from the Planning and Compulsory Purchase Act 2004. In addition European Directive 2001/42/EC requires Strategic Environmental Assessment to be undertaken to assess the effects of plans specifically on the environment. Government guidance (2005) requires Sustainability Appraisal and Strategic Environmental Assessment to be undertaken together as the processes are very similar. Sustainability appraisal encompasses Strategic Environmental Assessment as the former looks at environmental, social and economic impacts.
- 1.2** The Sustainability Appraisal has gone through several iterations as policies have developed. It has involved systematically reviewing all policies against the twenty three Sustainability Appraisal objectives, considering if and how those policies would further the objectives. The Submission Draft Core Strategy was supported by a Sustainability Appraisal Main Report and Habitats Regulations Assessment (HRA) in September 2011. A number of main modifications to the Babergh Core Strategy were proposed in response to the public consultation on the Submission Draft Core Strategy in the autumn 2011 and the publication of the final National Planning Policy Framework (NPPF) in March 2012. These modifications were reassessed in terms of their sustainability and the results of this assessment were published in the Addendum to the Sustainability Appraisal Main Report in June 2012.
- 1.3** Following the Examination in March 2013 a schedule of further proposed Main Modifications to the Babergh Core Strategy has arisen to respond to the Inspector's questions. This report sets out the results of the Sustainability Appraisal of the further proposed Main Modifications to the Babergh Core Strategy and should be read in conjunction with the Sustainability Appraisal Main Report (September 2011) and the Addendum to the Sustainability Appraisal Main Report (June 2012).

2. Schedule of further Proposed Main modifications to the Babergh Core Strategy (2011 - 2031)

- 2.1** The schedule of further proposed Main Modifications to the Babergh Core Strategy set out in the Table 1 below have arisen as a result of the Council responding to the Inspector's questions, to issues raised during the examination hearing sessions, and to further consideration and efforts to resolve objections where possible.

Table 1: Changes to policies as a result of the Examination and the SA response.

To avoid any unnecessary confusion, we have already taken as accepted the modifications that were consulted on during July - Aug 2012 (see Core Doc K01). These new changes are shown as either **bold underline to denote new text** or **~~bold strikethrough~~** for deleted text.

Mod no.	Page no.	Policy / Para or Map ref	Post Submission Modification	Impact on SA
1	i	Exec Summary Section 1	<p>Delete text in final paragraph of section 1 in Executive summary:</p> <p>For future growth the focus moves away from “targets” and “prescribed numbers” and instead is driven by ensuring provision is made for the right kinds of jobs and homes, in the right place at the right time. The proposed approach was informed by a public exercise in 2010 to review the approach towards growth for Babergh. At the same time The Regional Plan – The East of England Plan (adopted in 2008) remains in place (until such time as this is abolished by the Government) and there is accordingly a need for Babergh’s new plan to be in general conformity with this document. The Submission Draft Local Plan Part 1: Core Strategy and Policies is considered to be in general conformity with both this and the National Planning Policy Framework (published March 2012).</p>	<p>No</p> <p>This is a minor change to the explanatory text and does not introduce new issues. It addresses the changes to The East of England Regional Strategy being revoked (3rd January 2013) and the plan has been updated in the light of these changes.</p>
2	ii	Exec Summary Section 4	<p>Delete text in first paragraph on page iii, section 4 of the Exec Summary:</p> <p>The level of new homes to plan for is in line with that of the regional plan (or RSS: at approximately 300 per year, which is just above the 280 annual RSS figure and will compensate for some previous under provision since 2001). The net effect is a need to find and allocate enough new sites to provide for 2,500 new homes over the Plan period to 2031. It is considered that this number of homes is evidence based and conforms with the regional plan. The emphasis in planning for new homes will be much more about ensuring that we provide the right kind of homes (that is those of high quality design, sustainability, affordability and provided in the right locations where most needed and beneficial) rather than a very high volume of new homes. This will also ensure that settlements in Babergh are not swamped or overwhelmed by a level of development that is out of scale with existing communities but instead setting a level that also meets identified, essential needs.</p>	<p>No</p> <p>This is a minor change to the explanatory text and does not introduce new issues. It addresses the changes to The East of England Regional Strategy being revoked (3rd January 2013) and the plan has been updated in the light of these changes.</p>

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3	2	1.3	<p>Delete paragraph 1.3</p> <p>1.3 Summary of Position on the Regional Spatial Strategy (RSS) (The East of England Plan, adopted 2008)</p> <p>In preparing Part 1 of the new local plan, the Council has had regard to the adopted RSS and it is considered that the draft Core Strategy and policies document is in general conformity with it. This is notwithstanding the likelihood that the East of England Plan will be revoked relatively soon, as all RSSs are expected to be abolished through the above-mentioned ‘Localism’ Act. Acknowledging the evolving changes proposed to the planning system, this document has been prepared with a strong emphasis on the need to reflect local circumstances, needs and preferences as key guiding considerations, along with the other extensive bodies of evidence that we have gathered, interpreted and applied as relevant to, and suitable for, the locally distinctive circumstances of Babergh. In a similar vein, the evidence used to inform both the adopted RSS and the emerging RSS (review to 2034) is accepted overall and remains both relevant and applicable to the formulation of this new Plan document.</p> <p>Please note that further information on this matter will be included in the supporting technical background document dealing with ‘Conformity’.</p>	<p>No</p> <p>This is a minor change to the explanatory text and does not introduce new issues. It addresses the changes to The East of England Regional Strategy being revoked (3rd January 2013) and the plan has been updated in the light of these changes.</p>
4	19	2.1.4	<p>At the end of the 2nd paragraph delete the full stop and add:</p> <p>A few of these villages are larger settlements and were previously identified as Sustainable Villages and then as Key Service Centres (Growth Options and Scenarios consultation), for example, Shotley, Acton and Great Waldingfield. In the case of the latter two, it is their proximity to larger service centres, namely Sudbury / Great Cornard and Long Melford, which influences the role they play in serving the wider rural communities. In the case of Shotley, this reflects its location at the end of a peninsula such that it has a very restricted hinterland area. These larger settlements, together with the smaller Hinterland Villages, do have a role as villages (and as service centres) in their own right, as well as providing some support for the</p>	<p>No</p> <p>The proposed additional text does not amend any of the objectives but provides clarification regarding the approach towards the rural areas. Therefore there are no implications of the proposed change on the Sustainability Appraisal.</p>

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			<p>rural areas beyond, but to a lesser extent than the Core Villages. This illustrates the approach towards the rural areas, being reflected by the function of settlements, rather than size or number of services, which relates more to how people actually live in these areas <u>and more accurately reflects the sustainable nature of the Core Villages. In other words, a larger village with relatively few services for the size of the population (e.g. Brantham) will be less sustainable than a village with a smaller population and a relatively good range of services (including Doctors surgery, more than one shop, and pubs and other community assets) e.g. Bildeston. Making the larger villages Core Villages based on size will not make them more sustainable. The designation as a Core Village will not automatically confer a certain level of development - this will depend on the size, character, location, proximity to towns and other Core Villages, and the role it plays within its hinterland.</u></p>	
5	19	2.1.4	<p>Brantham as a Hinterland Village. Add an (amended) additional sentence at the end of the 2nd paragraph under 2.1.4, to immediately follow on from the text suggested above:.</p> <p><u>Brantham is identified as a Hinterland Village as this reflects its current function, key service provision (convenience shop, primary school and access to public transport) and relationship with other surrounding settlements. Policy CS6a allocates a major regeneration site which, when delivered, may influence the role of Brantham, the key services available and the extent to which it may increasingly function as a hub for surrounding settlements in the future. Evidence of changes in the role of function of Brantham or other settlements will be reflected in monitoring and review and if appropriate may be defined as a Core Village in the future.</u></p>	<p>No</p> <p>The proposed additional text does not amend any of the objectives but provides clarification regarding the approach towards the rural areas. Therefore there are no implications of the proposed change on the Sustainability Appraisal.</p>
6	20	Map 4	<p>Re Map 4 (was previously Map 5) – add a note on the map read:</p> <p><u>Note: This map shows Functional Clusters of villages in Babergh i.e. the Core Villages with their hinterlands. Some Hinterland and rural villages and hamlets appear in more than one Functional Cluster as this map reflects</u></p>	<p>No</p> <p>The proposed additional text provides clarification regarding the Map 4</p>

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			<p><u>information gathered in 2010 through workshops, surveys and the input of community representatives from these settlements. Whilst all the Hinterland Villages are shown in these Clusters not all the smaller villages / rural hamlets are included.</u></p>	<p>showing Functional Clusters of villages in Babergh. Therefore there are no implications of the proposed change on the Sustainability Appraisal</p>
7	21	2.1.5	<p>To add clarity suggest additional wording in this paragraph as follows:</p> <p>2.1.5 Countryside</p> <p>As a rural district much of the area comprises countryside. Everywhere beyond the built up areas of the urban / regeneration areas and Core and Hinterland Villages, defined by settlement development boundaries, is treated as open countryside. This includes <u>the smaller rural villages</u>, some small clusters of houses located remotely from village centres and a few very small rural hamlets. <u>Some, but by no means all of the small rural villages are shown within the Functional Clusters on Map 4 as this map reflects the outcome of the consultation exercises, survey and parish councils' workshops held in 2010.</u></p> <p>The countryside still hosts some traditional activities which, by their very nature need to be located there. Although, there has been a need for diversification, agriculture, still makes up a very large part of our countryside between the villages, certainly in terms of land use.</p>	<p>No</p> <p>The proposed additional text provides clarification regarding the Map 4 showing Functional Clusters of villages in Babergh. Therefore there are no implications of the proposed change on the Sustainability Appraisal.</p>
8	22	2.2.1	<p>Delete text in the 2nd paragraph as follows:</p> <p>Guidance is provided to steer our strategy for growth for the district through the National Planning Policy Framework (March 2012), and prior to that through national guidance notes and statements. The adopted RSS set targets for new homes and jobs for each council area, and whilst the regional strategic level of policy is likely to be revoked, the sub-regional context for Babergh remains an important consideration. Babergh works with its neighbours in the Haven</p>	<p>No</p> <p>This is a minor change to the explanatory text and does not introduce new issues. It addresses the changes to The East of England Regional Strategy</p>

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			Gateway area across the county boundaries of Essex and Suffolk, and with neighbouring authorities in the Ipswich Policy Area.	being revoked (3 rd January 2013) and the plan has been updated in the light of these changes.
9	24	1 st para', Section 2.3	<p>Amend text in first paragraph of section 2.3 as follows:</p> <p>The adopted RSS (2008) set out in Policy E1 an indicative job growth target of 30,000 jobs for the Suffolk Haven Gateway (defined as Ipswich, Suffolk Coastal and Babergh). This was not apportioned between the districts, so it was for these local authorities to determine an appropriate distribution between them. Whilst having regard to job creation plans and aspirations for our neighbour authorities, we also consider that circumstances have moved on since then. The targets for new jobs set out on a district by district basis in the draft review of the RSS (to 2031) are a little different in nature from the RSS housing growth targets. The indicative jobs target figures in particular were developed by councils <u>Babergh has been</u> working together with neighbours <u>neighbouring</u> – in this area the Suffolk Haven Gateway / <u>Ipswich Policy Area</u> authorities – to provide a <u>realistic</u> “bottom up” estimate <u>of indicative jobs target figures</u> based on need / capacity and the local economic context. Accordingly, and whilst the Government has indicated that RSSs will be revoked, it . <u>It</u> is important to note that the proposed <u>indicative</u> jobs growth target figure <u>of the emerging RSS (9,700 for Babergh with <u>includes</u> an apportionment allowance for <u>new jobs on land within Babergh to be included within a jobs growth target for</u> the Ipswich Policy Area. <u>to be determined by the IPA authorities)</u> is considered to be founded on reliable evidence and that that evidence remains a material factor in determining an appropriate indicative jobs target figure for Babergh.</u></p> <p><i>For ease of reference this paragraph will read as follows;</i></p> <p><i>Babergh has been working together with neighbouring Suffolk Haven Gateway / Ipswich Policy Area authorities to provide a realistic “bottom up”</i></p>	<p>No</p> <p>This is a minor change to the explanatory text and does not introduce new issues. It addresses the changes to The East of England Regional Strategy being revoked (3rd January 2013) and the plan has been updated in the light of these changes.</p>

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			<p><i>estimate of indicative jobs target figures based on need / capacity and the local economic context. It is important to note that the proposed jobs growth target figure includes an allowance for new jobs on land within Babergh to be included within a jobs growth target for the Ipswich Policy Area.</i></p>	
10	24	2 nd para, Section 2.3	<p>Delete text in the 2nd paragraph of Section 2.3 and add additional text as follows:</p> <p>Assessing a realistic jobs growth target has also been considered from other approaches. One of these considered compensating for a predicted shortfall in meeting the adopted RSS target of 30,000. This used the forecast figure for Babergh of 8,100 jobs and added one-third of the residual Suffolk Haven Gateway target figure (i.e. one third of 7,140, assuming a three-way split between Babergh, Ipswich and Suffolk Coastal). This gives a figure of 10,480 new jobs. However, it was felt that this was overly optimistic, particularly given the loss of public sector jobs, and was only based on projecting target figures forward. Another calculation. <u>One approach was</u> based on the forecast figure of 8,100 <u>new jobs forecast in the former Regional Strategy (RS) (abolished January 2013)</u> applied the <u>where</u> the same percentage growth in new houses used in the <u>former RS</u>, i.e. 20% was applied to the jobs target for the district to 2031. as had been used in the adopted RSS for the growth in new houses i.e. 20%. This gave a figure of 9,720 new jobs.</p> <p><i>For ease of reference this paragraph will read as follows;</i></p> <p><i>Assessing a realistic jobs growth target has also been considered from other approaches. One approach was based on the figure of 8,100 new jobs forecast in the former Regional Strategy (RS) (abolished January 2013) where the percentage growth in new houses used in the former RS, i.e. 20% was applied to the jobs target for the district to 2031. This gave a figure of 9,720 new jobs.</i></p>	<p>No</p> <p>The proposed text amendments do not introduce new principles or objectives. It addresses the changes to The East of England Regional Strategy being revoked (3rd January 2013) and the plan has been updated in the light of these changes. It gives greater clarification how a realistic jobs growth target has been considered and these changes do not have any implications on the Sustainability Appraisal.</p>

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11	29	2.6.3	<p>Delete reference to RSS in penultimate sentence of para 2.6.3</p> <p>Long established groupings of senior officers have worked together closely for a considerable length of time (including Planning Policy, Development Management, Heads of Planning, Chief Executives, etc.). These groups were convened specifically for this purpose, for co-ordination of activity and to share best practice. A successful example is the Suffolk Sustainability Appraisal Group, initiated to produce county-wide annual monitoring indicator reports serving as joint evidence base material ('Suffolk's Environment'). A Suffolk-wide SA / SEA methodology has been developed together and used by each local planning authority for many years to support the Plans of each authority. Staff sharing and integration of local authorities is underway in various forms across Suffolk. A co-ordinating role has generally been performed by Suffolk County Council, previously in formal terms under the Structure Plan but also for the RSS's. This continues less formally under current planning system arrangements but a strategic planning role covering various different geographies remains in place nevertheless.</p>	<p>No</p> <p>This is a minor change to the explanatory text and does not introduce new issues. It addresses the changes to The East of England Regional Strategy being revoked (3rd January 2013) and the plan has been updated in the light of these changes.</p>
12	30	2.6.4	<p>Delete 2nd sentence and beginning of 3rd sentence in penultimate paragraph as follows:</p> <p>A good indicator of success was the achievement of New Growth Point status for the sub-region, levering in central government funds that have now mostly been invested. Another was recognition and identification of the HG sub-region within the adopted RSS (together with its own suite of area-specific policies). In response the The overall sub-region has demonstrated a track record of delivering housing growth at or above RSS required levels. The same does not apply to jobs growth, which is recognised as problematic and in need of redress. However, overall, these considerations are deemed to provide justification and support for Babergh's jobs-led approach (and economic growth ambitions) and our jobs-housing growth balance.</p>	<p>No</p> <p>This is a minor change to the explanatory text and does not introduce new issues. It addresses the changes to The East of England Regional Strategy being revoked (3rd January 2013) and the plan has been updated in the light of these changes.</p>

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13	30	2.7	<p>Add additional wording at the end of para 2.7 to provide further clarity regarding the role of BUABs in the future (see also proposed modification to paragraph 2.8.4 below):</p> <p>The overall development strategy for Babergh is to provide for a sustainable level of growth of jobs and homes to ensure that a better quality of life for everyone, now and in the future is achieved. Development of new jobs, homes, supporting infrastructure and other key services all need to ensure that the historic and natural environment is protected, together with locally distinctive characteristics of the towns and villages.</p> <p><u>The overall settlement hierarchy is set out in Policy CS1. The BUABs as previously defined (in the 2006 Babergh Local Plan) for the towns / urban areas, Core and Hinterland Villages remain in effect (unaltered) and Settlement Boundaries will be reviewed if necessary, defined and incorporated into the Site Specifics / Allocations DPD where appropriate</u></p>	<p>No</p> <p>The proposed changes provide greater clarity with regard to the role of BUABs in the future and do not introduce new issues. These changes do not have any implications on the Sustainability Appraisal.</p>
14	31	Policy CS1	<p>Amend Policy CS1 as follows:</p> <div style="border: 1px solid black; padding: 5px;"> <p>Policy CS1: Settlement Pattern Policy</p> <p>The development strategy for Babergh is planned to a time horizon of 2031. Most new development (including employment, housing, and retail, etc.) in Babergh will be directed sequentially to the towns / urban areas, and to the Core Villages and Hinterland Villages identified below. In all cases the scale and location of development will depend upon the local housing need, the role of settlements as employment providers and retail / service centres, <u>the capacity of existing physical and social infrastructure to meet forecast demands and the provision of new / enhanced infrastructure</u>, as well as having regard to environmental, physical and social infrastructure constraints, and the views of local communities as expressed in parish / community / neighbourhood plans.</p> </div>	<p>No</p> <p>The proposed changes set out more clearly the requirements and parameters required for determination of the scale and location of development. Although a reference to the Policy CS6 was introduced it only confirms the benefits of this policy inclusion and is in conformity with the Sustainability Appraisal results. Therefore</p>

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			<p>Towns / Urban areas:</p> <ul style="list-style-type: none"> ▪ Sudbury and Great Cornard ▪ Hadleigh ▪ Babergh Ipswich Fringe (edge of urban area) <p>Core Villages serving Functional Clusters</p> <p>Core Villages will act as a focus for development within their functional cluster and, where appropriate, site allocations to meet housing and employment needs will be made in the Site Allocations document. Rural exceptions sites will also be pursued for these villages according to identified local needs.</p> <p>The Core Villages identified on the Key Diagram are:</p> <table border="0"> <tr> <td>• Bildeston</td> <td>• Glemsford</td> </tr> <tr> <td>• Boxford</td> <td>• Holbrook</td> </tr> <tr> <td>• Bures St Mary</td> <td>• Lavenham</td> </tr> <tr> <td>• Capel St Mary</td> <td>• Long Melford</td> </tr> <tr> <td>• East Bergholt</td> <td>• Nayland</td> </tr> </table> <p>Hinterland Villages</p> <p><u>Hinterland Villages will accommodate some development to help meet the needs within them. All proposals will be assessed against Policy CS6. Site allocations to meet housing and employment needs may be made in the Site Allocations document where circumstances suggest this approach may be necessary.</u></p> <table border="0"> <tr> <td>Acton</td> <td>Lawshall</td> </tr> <tr> <td>Aldham</td> <td>Layham</td> </tr> <tr> <td>Assington</td> <td>Leavenheath</td> </tr> </table>	• Bildeston	• Glemsford	• Boxford	• Holbrook	• Bures St Mary	• Lavenham	• Capel St Mary	• Long Melford	• East Bergholt	• Nayland	Acton	Lawshall	Aldham	Layham	Assington	Leavenheath	<p>proposed changes do not have any implications on the Sustainability Appraisal.</p>
• Bildeston	• Glemsford																			
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			<p>Belstead Bentley Brantham Brent Eleigh Brettenham Burstall Chelmondiston Chelsworth Cockfield Copdock & Washbrook Edwardstone Elmsett Great Waldingfield Harkstead Hartest Hintlesham Hitcham Holton St Mary Kersey</p> <p>Little Waldingfield Monks Eleigh Nedging and Naughton Newton Polstead Preston St Mary Raydon Shimpling Street Shotley Sproughton Stanstead Stoke by Nayland Stratford St Mary Stutton Tattingstone Wattisham Whatfield Woolverstone</p> <p>Countryside</p> <p>In the countryside, outside the towns / urban areas, Core and Hinterland Villages defined above, development will only be permitted in exceptional circumstances subject to a proven justifiable need.</p>	

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15	34	Policy CS2	<p>Amend Policy CS2: as follows to reflect the discussions, issues raised and questions asked by the Inspector through the examination process:</p> <div style="border: 1px solid black; padding: 10px; background-color: #f0f0f0;"> <p>Policy CS2: Strategy for Growth and Development</p> <p>Employment and housing growth will be accommodated within Babergh's existing settlement pattern and in new mixed and balanced communities on the edges of the towns and the Babergh Ipswich Fringe. Particularly in the case of the latter (but also in other cases), a co-ordinated approach towards planning and development in nearby local authority areas will be adopted. In order to ensure this, close collaborative working will be maintained with all partners, including local authorities, the Haven Gateway Partnership and others.</p> <p>The Local Economy</p> <p>In order to support and encourage economic growth and employment opportunities and to ensure that a continuous range and diversity of sites and premises are available across the district through the plan period existing employment sites will be regularly reviewed, and where appropriate protected, and new sites allocated in DPDs. These will comprise:</p> <ul style="list-style-type: none"> • sub-regionally and locally strategic sites at Sproughton, Brantham, Wherstead, Park (all allocated in this document) and the IP8 site, Sprites Lane, Ipswich (in subsequent document(s)), to accommodate the need for strategic and well-located sites for port-related and other businesses, and new business land and premises in Ipswich; • allocations within mixed-use planned developments at Chilton Woods and land off Lady Lane, Hadleigh; • employment land as part of mixed use development planned for the Strategic Allocations / Broad Location for Development; and, • where appropriate, and subject to regular review, allocations will be </div>	<p>No</p> <p>The proposed additional text provides further clarification regarding proposed new land allocation numbers in this Core Strategy and does not introduce any new issues or principle into the policy. Therefore there are no implications of the proposed change on the Sustainability Appraisal.</p>

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			<p>made to protect existing and provide for new employment areas in towns, villages and the rural area.</p> <p>Sufficient land will be allocated, and existing sites and premises protected from other types of development to accommodate a range of employment development to provide for approximately 9,700 new jobs in Babergh by 2031. This includes strategic sites and sites within the Ipswich Fringe which will be allocated and protected to provide for jobs growth for Ipswich.</p> <p>Proposals for employment uses that will contribute to the local economy and increase the sustainability of Core Villages, Hinterland Villages and the rural economy will be promoted and supported where appropriate in scale, character and nature to their locality.</p> <p>Proposals for uses in new and emerging employment sectors, particularly those that:</p> <ul style="list-style-type: none"> • re-use existing land or premises, • contribute to farm diversification, • enhance tourism and the attractiveness of the district as a destination for visitors; and/or • design or produce low carbon goods or services, will be encouraged subject to scale and impact on their location, and the provisions of other policies in this Core Strategy and Policies document, particularly Policy CS10. A flexible approach will be taken to home working and other innovative approaches to sustainable economic activity that make a positive contribution to the local economy and are in scale and character with, and appropriate to, their location. <p>Town centres and Core Villages are the main focus for retail, leisure and community uses in the district. A healthy mix of uses and range of shops and services will be promoted in the two principal town centres of Sudbury and Hadleigh to ensure that these centres are active, vibrant and well used.</p>	

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			<p>Allocations will be made in the Site Specific DPD, as appropriate, for new retail floorspace in Sudbury and Hadleigh.</p> <p>Number and Distribution of New Homes</p> <p>Babergh District Council will make provision for 5,975 new dwellings between 2011 and 2031 in the District. These dwellings are planned as follows: 1,100 between 2011-2016; and 4,875 between 2017-2031. The housing target will be achieved by:</p> <ul style="list-style-type: none"> Existing commitments as identified in the trajectory; Allowing for a windfall figure of 1,640 dwellings; Making provision for 2,500 new dwellings to be built in the following locations: <p><u>Proposed new land allocation numbers in this Core Strategy:</u></p> <table border="1" data-bbox="689 826 1554 1102"> <thead> <tr> <th>Location</th> <th>No of Dwellings</th> </tr> </thead> <tbody> <tr> <td>Sudbury and Great Cornard</td> <td>850 <u>(Note 1)</u></td> </tr> <tr> <td>Hadleigh</td> <td>250 <u>(Note 2)</u></td> </tr> <tr> <td>Ipswich Fringe</td> <td>350 <u>(Note 3)</u></td> </tr> <tr> <td>Core & Hinterland Villages</td> <td>1,050 <u>(Note 4)</u></td> </tr> <tr> <td>Total</td> <td>2,500</td> </tr> </tbody> </table> <p>Implementation and delivery:</p> <p>The Council will introduce management actions to address housing delivery should there be a 20% deviation in housing delivery as opposed to targets for 2011 - 2016; and 2017 - 2021; and a 10% deviation for 2022 - 2026. These management actions could include constructively and proactively working with developers to bring forward committed or allocated sites; reviewing phasing of allocated sites; reviewing housing targets and</p>	Location	No of Dwellings	Sudbury and Great Cornard	850 <u>(Note 1)</u>	Hadleigh	250 <u>(Note 2)</u>	Ipswich Fringe	350 <u>(Note 3)</u>	Core & Hinterland Villages	1,050 <u>(Note 4)</u>	Total	2,500	
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			<p>associated policies; and allocating additional sites to meet targets if required.</p> <p><u>Note 1: This figure includes the additional 350 dwellings allocated at Chilton (in addition to the 700 dwellings originally allocated in the 2006 Local Plan and carried forward in the Core Strategy) (see Policy CS3) + 500 dwellings at the Strategic Broad Location for Growth – East of Sudbury / Great Cornard (see Policy CS3a)</u></p> <p><u>Note 2: This figure is the dwellings allocated at the strategic allocation at Hadleigh (see Policy CS4)</u></p> <p><u>Note 3: This figure is the dwellings allocated at the strategic allocation at the Ipswich Fringe (see Policy CS5)</u></p> <p><u>Note 4: This figure is the allowance made for rural growth (see Policy CS1)</u></p>	
16	35	2.8.1	<p>Amend paragraph 2.8.1 as follows to include reference to the capacity of infrastructure;</p> <p>Boundaries and detailed policies / guidance on the identified Broad Location for future growth to the east of the town will be developed and refined through consultation and engagement with the local community, stakeholders, and landowners in future DPDs. In all cases it is important that all new development in Sudbury / Great Cornard, including development outside Chilton Woods and the Broad Location for development respects its context in terms of character, infrastructure, integration, and accessibility <u>and the capacity of infrastructure to accommodate planned levels of growth.</u></p>	
17	36 - 39	Policy CS3	<p>Make the following amendment to Policy CS3 in response to matters raised at the examination hearing:</p> <div data-bbox="595 1227 1648 1410" style="border: 1px solid black; padding: 5px;"> <p>Policy CS3: Chilton Woods Strategic Land Allocation and Strategy for Sudbury / Great Cornard</p> <p>A. Chilton Woods Strategic Land Allocation</p> </div>	<p>Yes</p> <p>The proposed modifications provide greater certainty in respect of delivery and set out more clearly the requirements and parameters required for the</p>

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			<p>A comprehensive, mixed land-use development is allocated on 131 hectares of land in the Chilton and Woodhall area north of Sudbury as shown on map A. A masterplan will be required to guide development, together with development feasibility / viability evidence and a proposed phasing programme <u>(to include as a minimum the items listed i to vii below)</u>. This allocation is expected to provide an integrated, high-quality and sustainable development that fulfils the requirements of other policies in this Core Strategy, particularly Policies CS0 and CS10, and reflects the aspirations of Suffolk's Greenest County initiative. The planning application(s) must be accompanied by an Environmental Impact Assessment.</p> <p><u>A piecemeal approach to development within the allocated area will not be acceptable unless such development conforms to an approved / adopted master and phasing plan and does not prejudice the delivery of necessary infrastructure.</u></p> <p>The development will provide and include, and the masterplan will show:</p> <ul style="list-style-type: none"> a. <u>Approximately 15</u> 15.7 hectares of new employment land on the western part of the development (north of Woodhall Business Park) for employment related uses. (to include provision for a waste transfer station, household and recycling and refuse depot). Access to this development will be via a new distributor road linked to the A134 west of the existing Tesco superstore. An initial phase of employment development may make use of an additional means of access via Woodhall Business Park as part of a comprehensive and agreed access strategy and phasing plan; b. <u>Approximately 5</u> 5.3 hectares of land to the north of Waldingfield Road are allocated for employment related use(s) (towards the scheme's eastern end) <u>subject to the new development having</u> a low impact <u>only</u> in terms of traffic generation and on <u>nearby</u> residential amenity. Some of this allocated development has already been implemented and 	<p>delivery of this mixed use development. Additional text proposes new objectives and principles therefore is likely to have effect on the Sustainability Appraisal.</p>

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			<p>is in situ. Access to this development will be via the existing access to Chilton Airfield on Waldingfield Road;</p> <p><u>c. Provision for a waste facility, to include household waste and recycling centre;</u></p> <p><u>d. Provision for approximately 1,050 new homes (on an area of approximately 33 32.6ha). The This residential element is required to have direct access to the A134. Access will be provided from a new distributor road designed to link the A134 with Aubrey Drive;</u></p> <p><u>e. Designed provision for effective functional separation between residential areas and employment land, particularly for those land uses / activities with greater impact on residential amenity (often non B1 type employment activities);</u></p> <p><u>f. Structural landscaping / community woodland <u>Provision of community woodland and structural landscaping (minimum of 30.5 approximately 30 hectares) located throughout the site and</u> along the boundaries of the site. This must be designed to take account of existing features such as trees, hedgerows and watercourses, <u>and to coordinate with the spatial requirements, design and context for the items referred to in points g and h below.</u> The scheme must include <u>provide</u> for long-term, comprehensive financial and management / maintenance plans and arrangements for <u>such community woodland</u> and for the local community <u>and Chilton Parish Council, Sudbury Town Council, Long Melford and Acton Parish Council</u> to be involved in its <u>design</u>, establishment and management;</u></p> <p><u>g. Surface water attenuation will be required to minimise the risk of flooding (the preferred means being SUDS);</u></p> <p><u>h. Provision of landscaping, green infrastructure (which may incorporate 'blue' infrastructure such as balancing ponds/wetland created as part of the SUDS) and open space / leisure & recreational facilities (minimum 8.2 approximately 8 ha); and also an area of allotments of between 0.5ha and 1ha, which is to be agreed with local parish councils. This provision is to be in addition to the community</u></p>	

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			<p><u>woodland and structural landscaping referred to above. Green infrastructure to</u> be planned to coordinate with the wider network for Sudbury and Great Cornard area;</p> <p>i. A transport assessment based upon the development proposals will be required and a travel plan may<u>will</u> be necessary;</p> <ul style="list-style-type: none"> • Provision of an appropriate new neighbourhood centre for the development with local retail provision and community facilities (minimum 1.6ha); • Provision of approx. 1.6ha of land for community facilities / uses (provision for which may be integrated together with the neighbourhood centre if such a location is appropriate). <p>j. <u>Provision of a well located and accessible community ‘hub’ / village / neighbourhood centre and land of an appropriate size to accommodate community infrastructure uses such as:</u></p> <ul style="list-style-type: none"> • <u>community facilities, services and uses such as a community hall / building with flexible space for community meetings, and/or sports and social club with changing rooms, and associated sports pitches (such as cricket and football), and/or multi-surface sports areas, and parking;</u> • <u>local retail provision, a pub and/or café, and leisure uses, business space and a residential element including opportunities for live / work units; and</u> • <u>a civic square / area for market stalls/community meeting area.</u> <p>k. Provision for approximately 3 ha. of land for education (primary school / nursery provision) and associated uses;</p> <p>l. An evidence-based package of sustainable transport measures to include <u>the creation of new routes</u> and/or the enhancement of existing links for pedestrians and cyclists to the town centre, rail station, employment areas, schools, bus stops, etc.;</p> <p>m. Any requirement for off-site transport / highway improvements will be</p>	

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			<p>determined by transport assessment evidence;</p> <p>n. <u>Any requirement for mitigation of healthcare impacts will be determined by evidence that proposals can be supported by existing infrastructure and / or a reasonable prospect of provision of funding to meet the needs arising from the development.</u></p> <p><u>The land uses specified above have been established through masterplanning and Place-Shaping work. The approximate land areas are indicated as a guide for the preparation of a masterplan as part of the planning application process. The land uses identified above comprise 94.5 ha. of the total 131 ha. site area, and individual elements of the development will be considered in the context of the comprehensive development of the site, and on evidence available at the time.</u></p> <p><u>The masterplan and supporting studies and feasibility/viability evidence should demonstrate and include:</u></p> <ul style="list-style-type: none"> i. <u>how the overall development, including its access points, positively responds to, and where possible enhances, designated heritage assets and their settings;</u> ii. <u>how the development will be designed to suit the landform /topography and landscape characteristics of the site and its local context, and protect the amenity of existing and future residents;</u> iii. <u>design principles for each development parcel (residential, business/employment land, community/neighbourhood centre/hub) including addressing the sustainable development policies in this and subsequent local plan documents (if relevant), and how they will be implemented;</u> iv. <u>outcomes from community engagement and mechanisms to establish delivery and ongoing management of community resources;</u> 	

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			<p>v. <u>phasing of the scheme, including provision of development, social and physical infrastructure and services;</u></p> <p>vi. <u>a biodiversity plan including any measures for protection, mitigation, compensation and/or new habitat creation; and</u></p> <p>vii. <u>the density and mix of housing types (including affordable housing provision) in line with Policies CS14 and CS15.</u></p> <p><u>Implementation and Delivery</u></p> <p>The Council is committed to working co-operatively with partners <u>and Chilton Parish Council, Sudbury Town Council, Long Melford and Acton Parish Council and the local community</u> to bring forward and deliver the Chilton Woods scheme in a timely way. This will include joint action to overcome potential key development issues, <u>such as the</u> around electrical power supply in the Sudbury area and its likely impact on development viability. It will also work jointly to ensure timely delivery of satisfactory access arrangements, sustainable transport provision, <u>the community woodland</u>, necessary community facilities and <u>structural</u> landscaping / woodland screening at the appropriate point in the overall development process.</p> <p>Development at Chilton Woods is programmed for commencement in the earliest part of the Plan period. Progress on its planning and development will be closely monitored and the following phasing and timing reviewed to ensure delivery of an appropriate amount of new housing and employment land through the plan period:</p> <ul style="list-style-type: none"> i. 2012 onwards - implementation of the Chilton Woods Mixed Use Development as shown on Map A in accordance with this Policy; ii. 2016 - review of progress with delivery of Chilton Woods and target date set for release of land for employment and housing in the Broad Location of Growth identified on the Key Diagram; iii. mid – late part of plan period (or earlier if required following the 2016 	

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			<p>review) – Masterplan submitted and approved and first phase of land released for development for employment land and approximately 500 dwellings in accordance with Policy CS3a.</p> <p>B. <u>Other Development for Sudbury / Great Cornard</u></p> <p>A Neighbourhood Plan and/or other DPD(s) will be prepared to provide a comprehensive framework to ensure that any planned growth and development for Sudbury / Great Cornard (other than that at Chilton Woods) is well integrated with the town and delivered at the right time.</p> <p>Development in Sudbury / Great Cornard should comply with other policies the Core Strategy, in this Local Plan particularly Policy CS10, and other subsequent documents, and where appropriate, provide:</p> <ul style="list-style-type: none"> • high quality design, structural landscape planting, and layouts and scale of development that respect adjacent landscape or townscape features, ensure a separate identity and avoid creeping coalescence with adjacent settlements; • a green infrastructure framework connecting with and adding or extending formal and informal green spaces, wildlife areas, and natural landscape settings and features; • good links and/or the enhancement of existing links for pedestrians and cyclists to the town centre, rail station, employment areas, schools, bus stops, etc. <p>C. <u>Sudbury Town Centre</u></p> <p>As the district’s principal town centre, the Council will encourage and support the continued growth, expansion and diversification of Sudbury town centre to serve its catchment area, particularly the provision of larger, more versatile retail and service units, and improvements to public transport, strategic and local access.</p>	

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18	39 - 40	Policy CS3a	<p>Amend Policy CS3a as follows:</p> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>Policy CS3a Strategic Broad Location For Growth - East of Sudbury / Great Cornard</p> <p>Provision will be made for land to be developed for employment uses and approximately 500 new homes within the broad location for growth to the east of Sudbury / Great Cornard, as shown on the Key Diagram. The site extent, definition of the boundary and detailed guidance for this will be developed and refined through consultation and engagement with the local community, stakeholders and landowners in a future DPD. The amount of land to be released for employment uses as part of this mixed use development will be informed by the evidence and monitoring of the employment trajectory and land availability at the time.</p> <p>Development of land for employment uses and approximately 500 new homes within the broad location for growth east of Sudbury / Great Cornard will need to:</p> <ul style="list-style-type: none"> (a) Ensure that high quality design and the layout respect the adjacent landscape, heritage assets, topography and townscape; (b) Ensure the new development has a separate identity and avoids coalescence with adjacent settlements; (c) Ensure development incorporates a green infrastructure framework connecting, adding or extending formal and informal green spaces, wildlife areas and natural landscape settings and features; (d) Ensure good links and/or the enhancement of existing links for pedestrians and cyclists to achieve strong connectivity to the town centre, rail station, employment areas, schools, community facilities and bus stops etc; and (e) Ensure adequate provision of supporting infrastructure including education provision, community facilities and transport. </div>	<p>No</p> <p>The proposed additional text provides further clarification on requirements for development of land for employment East of Sudbury/ Great Cornard. An addition of ‘ heritage assets’ is likely to have a positive effect on the SA Objective 18 but in principle will not significantly change the overall SA Score. Therefore there are no implications of the proposed change on the Sustainability Appraisal.</p>

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			<p>Implementation and Delivery</p> <p>The timing for the delivery of development within this broad location for growth will be the mid-late part of the plan period, unless monitoring of progress for policy CS3 requires development to the east of Sudbury/ Great Cornard to come forward sooner. Progress for the delivery of Policy CS3 will be closely monitored and the following phasing and timing reviewed to ensure the delivery of an appropriate amount of employment land and new homes throughout the plan period;</p> <ul style="list-style-type: none"> i. 2016- review of progress on the delivery of policy CS3 (Chilton Woods Mixed use development) target date set for the release of land for employment and housing land within the broad location for growth east of Sudbury / Great Cornard; ii. 2016-Mid part of the plan period, work with the local community, stakeholders and landowners to clearly define the boundaries and parameters for the mixed used (employment uses (amount to be defined at this stage based on monitoring and review of the employment evidence) and approximately 500 new homes) Broad Location for growth east of Sudbury/ Great Cornard through the preparation of a further DPD; iii. Mid-Late part of the plan period (earlier if required by the 2016 review date) a Masterplan to be submitted and approved for the first phase of land released for development for employment uses and approximately 500 homes. 	
19	41 - 43	Policy CS4	<p>Amend Policy CS4 as follows:</p> <div style="border: 1px solid black; padding: 5px;"> <p>Policy CS4: Strategy for Hadleigh</p> <p>A. Hadleigh Strategic Site Allocation</p> </div>	<p>Yes</p> <p>The proposed modifications provide greater certainty in respect of delivery and set out more clearly the</p>

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			<p>Land is allocated to the immediate east of Hadleigh for mixed use development as indicated generically on the Key Diagram and shown on Map B. Development within this area should be guided by a masterplan and development feasibility evidence and provide:</p> <ul style="list-style-type: none"> • <u>Approximately</u> 5.5 hectares of employment land; • <u>Approximately</u> 250 dwellings; • <u>how the development will be designed to suit the landform / topography and landscape characteristics of the site and its local context;</u> • high quality design, structural landscape planting, and layouts and scale of development that respect adjacent landscape or townscape features, and maintains the separate identity of Hadleigh; • <u>design principles for each development parcel (residential and business/employment land) including addressing the sustainable development policies in this and subsequent local plan documents, and how they will be implemented;</u> • <u>the range, density and mix of housing types and the level of affordable housing provision in line with Policies CS14 and CS15;</u> • <u>phasing of the development including social and physical infrastructure and services, and where appropriate, including any development or provision proposed beyond the plan period;</u> • a green infrastructure / open space framework connecting with and adding or extending formal and informal green spaces, wildlife areas, and natural landscape settings and features, <u>and proposals for green and blue infrastructure to assimilate new development into the landscape and create new habitats.</u> This must provide for a significant functional buffer providing effective separation between residential and employment uses (where such uses may have material adverse impacts on residential amenity); • <u>a biodiversity plan including any measures for protection, mitigation, compensation and / or new habitat creation;</u> 	<p>requirements and parameters required for the delivery of this mixed use development. Additional text proposes new objectives and a principle therefore is likely to have effect on the Sustainability Appraisal.</p>

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			<ul style="list-style-type: none"> • <u>a drainage strategy, with provision for a sustainable urban drainage system;</u> • good links and/or the enhancement of existing links and facilities (such as bus stops) for pedestrians and cyclists to the town centre and other local shops and services, employment areas, schools, bus stops etc.; • evidence based measures to enhance social / community facilities provision as necessary; • <u>enhanced or additional social / community facilities (such as provision of allotments, or cemetery, or community open space within the green infrastructure framework, and/or meeting room / social centre / community hall) as evidenced through local community engagement in the masterplanning process;</u> • principal access to be provided by <u>vehicular access by means of</u> the main north-south spine road served from the A1071 roundabout together with a secondary / emergency form of <u>an access on to Frog Hall Lane only for pedestrians, cyclists and emergency vehicles. if necessary.</u> Off-site transport improvements may also be necessary; <u>In addition a travel plan will be required;</u> <p><u>Implementation and Delivery</u></p> <p>No critical obstacles have been identified for the development to proceed and its implementation has been provided for in the early part of the Plan period. The principal planning mechanism of a masterplan will facilitate this early delivery.</p> <p>Development of this allocation together with any other new development in Hadleigh will be closely monitored and reviewed to ensure delivery of an appropriate amount of new housing and employment land through the plan period:</p> <ul style="list-style-type: none"> • 2012-14 – preparation and consultation on a masterplan for the area 	

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			<p>shown on Map B in accordance with this Policy;</p> <ul style="list-style-type: none"> • 2014-15 – review of progress with submission and consideration of a planning application for the allocated site; • 2018 - review progress with delivery and if necessary review alternatives through a neighbourhood plan or other DPD. <p>B. Strategy for Hadleigh</p> <p>Hadleigh will be promoted as a visitor attraction and a wide range of diverse uses and facilities will be encouraged. Small scale refurbishments and redevelopments aimed at enhancing retail quality and consumer choice will be supported in this centre. <u>Development for town centre uses and refurbishments that enhance the retail quality, choice and vitality / viability of Hadleigh town centre will be encouraged.</u></p> <p><u>Note: The land uses identified above are indicated as a guide for the preparation of a detailed masterplan as part of the planning application process, and individual elements of the development will be considered in the context of the comprehensive development of the site, and on evidence available at the time.</u></p>	
20	44	Policy CS5	<p>Amend Policy CS5 as follows:</p> <div style="border: 1px solid black; padding: 5px;"> <p>Policy CS5: Strategic Site Allocation: Babergh Ipswich Fringe</p> <p>Approximately 26 hectares of land within Babergh's Ipswich Fringe are allocated for mixed use development as shown on the Key Diagram and on Map C to provide:</p> <ul style="list-style-type: none"> • <u>Approximately</u> 6 hectares of land to create a quality 'gateway' business / employment <u>area in addition to the ¹existing employment uses within the allocated area; and</u> </div>	<p>No</p> <p>The proposed changes do not introduce new issues and provide further clarification regarding requirements for Babergh Ipswich Fringe allocation for mixed use development. Therefore it is unlikely to have any impact on the Sustainability Appraisal.</p>

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			<ul style="list-style-type: none"> • a new community of approximately 350 homes; <p>A masterplan will be required which should:</p> <ul style="list-style-type: none"> • be based upon and designed around a green infrastructure framework providing high quality design, structural landscape planting, and connections to or potential links with existing formal and informal green spaces, wildlife areas, and natural landscape settings and features, particularly the Gipping Valley footpath, Chantry Park and Belstead Brook Park, and ensure a separate identity and avoid creeping coalescence with adjacent settlements; and • provide good links and/or the enhancement of existing links for pedestrians and cyclists to local shops and services, schools, employment areas, and public transport routes and services <p>The masterplan and supporting studies and feasibility / viability evidence should demonstrate and include:</p> <ul style="list-style-type: none"> • the basic road network, links to the existing highway network, and any consequential off-site highway improvements required; • a Travel Plan designed to optimise the use of buses, cycles and walking, and specifically to address travel to school journeys including road crossings, and the long-term implications of school transport funding and provision. The scale / proportion of developer funding necessary and a delivery / funding implementation timetable will need to be the subject of a S106 agreement and should be illustrated in the masterplan to ensure revenue funding is secured to enable the relevant infrastructure / service to be in place from the first occupation of the site and for the medium to long term; • primary school and nursery (early years education) provision and timing of delivery; • how the development will be designed to suit the landform / topography and landscape characteristics of the site and its local context, and protect 	

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			<p>the amenity of existing and future residents;</p> <ul style="list-style-type: none"> • design principles for each development parcel (residential and business/employment land) including addressing the sustainable development policies in this and subsequent local plan documents, and how they will be implemented; • phasing of the development including provision of buildings, social and physical infrastructure and services, and where appropriate, including any development or provision proposed beyond the plan period; • structural / major landscaping, open space and proposals for green and blue infrastructure to assimilate new development into the landscape and create new habitats; • a biodiversity plan including any measures for protection, mitigation, compensation and / or new habitat creation; • the range, density and mix of housing types and the level of affordable housing provision in line with Policies CS14 and CS15; <p>Implementation and Delivery</p> <p>It is expected that development in the allocated area will start to be delivered in the early - middle part of the plan period. No critical risk factors or delivery obstacles likely to cause substantial delay have been identified.</p> <p>Implementation in the allocated area will be closely monitored and reviewed to ensure delivery of an appropriate amount of new housing and employment land in Babergh's Ipswich Fringe through the plan period:</p> <ol style="list-style-type: none"> i. 2012 - 14 – preparation and consultation on a masterplan for the area shown on Map C in accordance with this Policy; ii. 2014 - 15 - review of progress with submission and consideration of a planning application for the allocated site; iii. 2018 – review progress with delivery and if necessary review alternatives through a neighbourhood plan or other DPD. 	

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			<p><u>Note 1: The masterplan should indicate and respect the existing employment uses within the strategic site allocation, and proposals to intensify and/or expand these existing uses will be encouraged and treated on their merits providing such proposals compliment new employment uses emerging through the masterplanning and planning application processes.</u></p> <p><u>Note 2: The land uses identified above are indicated as a guide for the preparation of a detailed masterplan as part of the planning application process, and individual elements of the development will be considered in the context of the comprehensive development of the site, and on evidence available at the time.</u></p>	
21	47	Policy CS5a	<p>Amend Policy CS5a Sproughton Strategic Land Allocation as follows:</p> <p>Policy CS5a: Sproughton Strategic Employment Land Allocation</p> <p>The former ‘British Sugar’ (sugar beet factory) site, Sproughton (Ipswich fringe) is allocated for retention in employment related use(s) as shown on Map D. Proposals for redevelopment or re-use of the previously developed site (35.5 hectares) must be planned / approached on a comprehensive basis, with regard to the future of the entire site. Co-ordination of development could be achieved through a masterplan and/or development brief / concept statement.</p> <p><u>Development should comply with other policies in this Core Strategy particularly Policy CS10, and other subsequent documents.</u></p> <p>Applications will be assessed with regard to:</p> <ul style="list-style-type: none"> • protection of the biodiversity of the locality and any opportunities for enhancement; • protection of the wider river environment in the locality and any opportunities for enhancement, including improvement of the River 	<p>No</p> <p>The proposed changes do not introduce new issues and provide further clarification regarding requirements for Sproughton Strategic Employment Land Allocation for employment related use. Therefore it is unlikely to have any impact on the Sustainability Appraisal.</p>

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			<p>Gipping Riverside Path;</p> <ul style="list-style-type: none"> • retention of the natural area known as the island site (a separate 16 hectares approximately) and existing landscape tracts, together with proposals for further measures; • no material adverse impacts on residential amenity; • production of a satisfactory green travel plan, <u>with regard to provision / upgrading of sustainable transport access between the site, nearby villages and Ipswich town centre as necessary;</u> • the provision of any necessary measures to address transport impacts off-site, <u>including speed management, remodelled roundabout(s) providing access to the A14 and mitigation of additional development-related traffic generated through Sproughton village;</u> • production of a Flood Risk Assessment; and • feasibility / viability evidence <p>Implementation and Delivery</p> <p>The Council is committed to the successful redevelopment of this site and will work collaboratively and proactively with the landowner(s) / developer(s) and other interests towards this end. In principle, delivery of the site with the assistance of higher value commercial uses may will be acceptable. Part of the site may be required for residual waste treatment use, as provided for by the extant Waste Core Strategy (2011-2026).</p> <p>As a very large site, the site area may be broken down into different types of employment / commercial uses and redevelopment implemented in phases. In this way, it is anticipated that a consortium of site users / occupiers may be required to achieve redevelopment. The Council is also supportive of port-related development for the site (Note 1). The Council will also pursue and support in principle initiative(s) aimed at securing external funding for the successful delivery of this site's redevelopment (where justified) or accelerating its timescale if appropriate.</p>	

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			<p>The scale and complexity involved in redeveloping this site means that it is difficult to anticipate when specific phases will align with this Plan period. The Council will continue to work with neighbouring authorities in the Ipswich Policy Area and Suffolk Haven Gateway to promote and encourage redevelopment of this strategic site in the A14 corridor. Progress will be regularly monitored and the latest position reflected in regular employment land reviews and trajectories. If there is no progress with enabling this site to be made available for employment development (i.e. through ownership or other issues) within five years of adoption of this Local Plan Core Strategy the allocation will be the subject of review (to align with regular monitoring and review of sub-regional and locally strategic employment sites in the A14 corridor with neighbouring (IPA and SHG) authorities / organisations).</p> <p>Note 1: Current evidence indicates that this is not anticipated to take the form of a 'Dryport' (intermodal freight transport) solution.</p>	
22	XX	Map D	<p>Amend Map D Sproughton Strategic Employment Site Allocation to show Main Site and Island Site</p>	
23	48	Policy CS5b	<p>Amend Policy CS5b Wherstead Park Strategic Employment Land Allocation as follows:</p> <p>Policy CS5b Wherstead Park Strategic Employment Land Allocation</p> <p>The existing Wherstead Office Park (7.1 hectares), Wherstead is allocated for retention in employment uses as shown on Map E. A further 3.3 hectares of land immediately to the west is allocated for B1 development, as defined in the Town and Country Planning (Use Classes) Order 1987 (as amended). Residential development will not be considered acceptable at this collective site, apart from the conversion of the existing gatehouse buildings at the entrance of the Office Park from The</p>	<p>No</p> <p>The proposed changes do not introduce new issues and provide further clarification regarding requirements for Wherstead Park Strategic Employment Land Allocation. Therefore those changes are unlikely to have any impact on the Sustainability Appraisal</p>

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			<p>Street. The new greenfield allocation must be developed in the context of its adjacent site, although the latter may not be subject to redevelopment itself in the Plan period.</p> <p>Development should comply with other policies in this Local Plan particularly Policy CS10, and other subsequent documents. Applications will be assessed with regard to:</p> <ul style="list-style-type: none"> • the setting of the listed buildings; • protection of the playing field; and mature landscaping belts; • no material adverse landscape impacts on the Suffolk Coasts and Heaths Area of Outstanding Natural Beauty; • no material adverse impacts on neighbouring residential amenity; • provision of a new access from the A137 (designed and constructed to adoptable standards) to serve both the existing and new employment site, and closure of existing access from The Street to all but cyclists, pedestrians and emergency vehicles; • production of a green travel plan / contribution(s) to provision of local bus services; <p>Implementation and Delivery</p> <p>The Council will deliver its commitment to retention and promotion of the main Wherstead Park site in employment / commercial uses by working closely with leading partners including: Ipswich Borough Council; Suffolk County Council; Haven Gateway Partnership and the site's owner(s) / occupier(s). Any major changes leading to a loss of employment floorspace or significant diminution in occupation levels during the Plan period will prompt a review (to align with regular monitoring and review of sub-regional and locally strategic employment sites in the A14 corridor with neighbouring (IPA and SHG) authorities / organisations).</p>	

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			<div style="border: 1px solid black; background-color: #e0e0e0; padding: 5px; text-align: center;"> <p>The additional 3.3 ha of land remain allocated at this point but this will be reviewed and the allocation reconfirmed or deleted in the subsequent local plan / DPD documents.</p> </div>	
24	XX	Map E	Amend Map E Wherstead to show revised boundary	
25	49 - 52	2.8.5 & Policy CS6a	<p>Amend the supporting text preceding Policy CS6a and the policy itself as follows:</p> <p>2.8.5 Brantham Redevelopment / Regeneration Area</p> <p>The policy position on Brantham as a village and its position in the settlement pattern was explained at section 2.1.6. This is likely to be influenced over the Plan period by the presence and redevelopment of a major, brownfield (industrial) site, formerly occupied mainly by Wardle Storey and currently partly by ITW. As a large, under-used (and partly derelict) brownfield site in a gateway position to Babergh district, the Council considers that the ‘Do Nothing’ option for this site is not realistic or appropriate and it is committed to achieving its successful redevelopment / regeneration. The site’s location and characteristics present some important issues to address but also some valuable opportunities and the potential gains from its redevelopment are seen as very substantial. The Council’s approach towards redevelopment involves close joint working with the Haven Gateway Partnership (along with others) and developing a joint evidence base with the site owner’s representatives. Policy CS6a includes appropriate elements of the original Local Plan policy together with a review of the allocation, and updates to reflect the latest circumstances.</p>	<p>No</p> <p>The proposed changes both in supporting text and the Policy CS6a provide further clarification regarding requirements for Brantham Redevelopment / Regeneration Area.</p> <p>The inclusion of additional text is in line with the overall principles and objectives of the policy. It was previously acknowledged that there are challenges and constraints to regenerating this site, but doing nothing is not an acceptable option, particularly where so many local jobs have been lost. Therefore,</p>

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			<p>The existing / former industrial site at Brantham poses a unique challenge for the District. Much of the site is derelict, with buildings in need of demolition and land in need of decontamination. However, there is a significant and apparently thriving remaining operation by ICI Ltd, known as Imagedata.</p> <p>The site is partly crossed and partly abutted by the main London Liverpool Street to Norwich rail route, and has estuarial frontages. The industrial site is separated from the main village by Greenfield land within the same ownership <u>and the owners have suggested that some or all of this land (see Map F) should be developed for housing and open space, as part of the development package, in order to promote overall regeneration. This is being investigated and the policy allows through Proviso D, for these issues to be resolved.</u></p> <p>Adjacent land is designated as an AONB and as a SSSI. The intertidal mudflats and saltmarsh nature of the adjacent Stour estuary means that the area is also protected as a Special Protection Area (SPA) under the 1979 EU Birds Directive and Ramsar designations under the 1971 Ramsar convention. Unsurprisingly therefore the tongue of land to the south of the railway is of wildlife significance. Parts of the area are subject to flood risk, and proposals for development will be required to address flood risk, including the preparation of a Flood Risk Assessment and sequential test (as appropriate). It is acknowledged that there are challenges and constraints to regenerating this site, but doing nothing is not an acceptable option, particularly where so many local jobs have been lost.</p> <p>Brantham village underwent significant growth in the 1960s and 70s, at the time related to the industrial operation. The site is now ripe for a major regeneration scheme, in accordance with the principles laid down in the adopted Local Plan policy EM06 and the Council's Planning Position Statement of 2008. It will be expected that green infrastructure will be central to the character and layout of such a scheme in accordance with Policy CS10 (particularly with regard to providing mitigation within the proposed development for potential recreational impacts on the SPA and Ramsar site), and that it will deliver new employment buildings, new dwellings and improved community facilities proportionate to the amount of</p>	<p>proposed modifications do not introduce new issues and are unlikely to have any impact on the Sustainability Appraisal.</p> <p>Previous iterations of the Sustainability Appraisal made assumptions for the purposes of the assessment which included the issues related to the proposed modifications.</p>

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			<p>development permitted, all in accordance with an agreed Master Plan. A high quality development will be sought, particularly in the event that riverside development is sought.</p> <p>The masterplan and mitigation strategy will need to ensure that direct and indirect negative impacts on the integrity of the Stour and Orwell Estuaries SPA and Ramsar Site are avoided. In particular, provision of alternative Natural Green Space will be required, in line with the Haven Gateway Green Infrastructure Strategy. Provision and funding for the green infrastructure will be provided by the developer(s). It is anticipated that the green infrastructure provision would include creation of a new Public Open Space, for which the design and management plan should aim for a quality suitable for designation as a Local Nature Reserve.</p> <p>Given the site's scale and position near the border with Tendring / Colchester in Essex, the importance of working on cross-boundary matters is recognised. Its relationship with nearby rural areas (in all 3 districts) and particularly with Lawford / Manningtree / Mistley is also important.</p> <div data-bbox="629 888 1610 1414" style="border: 1px solid black; padding: 10px;"> <p>Policy CS6a Brantham Regeneration Area Allocation</p> <p>Land at Brantham Industrial Area is allocated as a regeneration area and special policy area (as shown on Map F) where the retention of current and future employment uses is to be prioritised and the redevelopment of obsolete buildings and under-used land achieves a balanced form of mixed-use development.</p> <p>Comprehensive redevelopment proposals for the whole of the allocated site will be informed and guided by feasibility / viability evidence and a masterplan. Together these will ensure the enhancement and balanced regeneration of the site; provide for the maximum possible retention and enhancement of local employment opportunities; deliver an appropriate level of residential development and community facilities; create new areas of public open space and</p> </div>	

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			<p>enhancement of pedestrian and cycle links between the site and the village.</p> <p>A. The land north of the railway line (25 ha.), being the former Wardle Storey and ICI (now ITW) works sites, forms the priority area for redevelopment, where new and retained employment land uses should predominate in principle</p> <p>B. The land south of the railway line (partly previously developed) (15 ha.) is expected to be subject to minimal or no new development. In this area, the opportunity to provide and enhance natural ecological assets should be prioritised</p> <p>C. The scale location and form of residential development should be determined with regard to:</p> <ul style="list-style-type: none"> • a level that is proportionate in scale to the existing village / parish and capable of satisfactory assimilation; • the need to ensure that new residential development is provided in suitable location(s) in relation to flood risk; • the need to provide a satisfactory relationship with other land uses, including potential 'bad neighbour' activities and processes; and • where access to local facilities, services and employment opportunities <u>and local facilities / services that have capacity to accommodate growth or new facilities / services</u> are maximised; addressing the meeting of identified housing needs <p><u>D. If viability evidence for a comprehensive and integrated planning solution to the whole site suggests additional residential development on some of the adjacent Greenfield land, between the site and the village (see Map F), this will be considered in relation to the benefits of the overall regeneration package.</u></p> <p>Applications will be assessed with regard to:</p>	

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			<ul style="list-style-type: none"> • an appraisal of the nature, extent and means of remediation of any land contamination present on the site; • production of a Flood Risk Assessment; • protection of the biodiversity and wider river environment in the locality and any opportunities for enhancement; • protection of the area's cultural heritage; • impacts on existing landscaping tracts, together with proposals for mitigation / further landscaping measures; • landscape impacts on the wider Dedham Vale and Suffolk Coast and Heaths Areas of Outstanding Natural Beauty; • no material adverse impacts on neighbouring residential amenity; • satisfactory improvements to and integration with the local road network, including vehicular access to the A137, separation of industrial and residential traffic within the site, the integration of pedestrian and cycle links, the production of a green travel plan, and contribution(s) to provision of local bus services. • development feasibility / viability evidence <p>Implementation and Delivery</p> <p>The Council is committed to achieving the positive, prompt and beneficial regeneration of this site and will continue to work constructively and proactively with landowners / developer(s) and other interests towards that end. The Council will also pursue and support in principle initiative(s) aimed at securing external funding for the successful delivery of this site's regeneration (where justified) or accelerating its timescale if appropriate.</p> <p>Given the lead time required to resolve complex planning and development issues; ensure a satisfactory form of development; and to see the build out of the regeneration area, a specific phasing period for this scheme within the Plan period is not considered appropriate.</p>	

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			<p>Progress will be regularly monitored and the latest position reflected in regular employment land reviews and trajectories. If there is no progress with preliminary work enabling this site to be redeveloped within five years of adoption of this local plan the allocation will be the subject of review (in consultation with neighbouring authorities).</p>	
26	XX	Map F	<p>Amend Map F Brantham to show the Regeneration Area Allocation and the indicative proviso land.</p>	
27	53 - 54	2.8.4	<p>For issues of clarity and confirmation, add additional guidance by amending para 2.8.4 as follows:</p> <p>At the end of the first paragraph following the bullet point list;</p> <p>Core Villages will accommodate a proportion of new development, and as each village is different in size, character, location and the role it plays within its rural hinterland it is not possible to identify a number, or range of homes numbers at this stage. The amount of new development and locations for growth in each of these settlements will be considered in detail with local communities at the site allocations stage and will depend on a thorough analysis of local needs, opportunities, environmental, physical and social infrastructure constraints, including:</p> <ul style="list-style-type: none"> • <u>Locally identified need - housing and employment</u> • <u>Specific local need such as affordable housing;</u> • <u>Flood Risk;</u> • <u>Nature conservation constraints / designated areas and implications of an Appropriate Assessment under the Habitats Directive (where appropriate);</u> • <u>Landscape considerations and designated sites (particularly the ANOBs);</u> • <u>Historic character and heritage assets;</u> • <u>Infrastructure constraints - physical infrastructure / utilities;</u> • <u>Infrastructure needs (e.g. transport, open space, leisure facilities) and access to services and facilities; and</u> 	<p>No</p> <p>The proposed additional text provides further clarification and additional guidance with respect to new development in Core Villages. These modifications do not introduce any new issues or concepts into the policy. Therefore there are no implications of the proposed change on the Sustainability Appraisal.</p>

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			<ul style="list-style-type: none"> <li data-bbox="577 284 1048 316">• <u>Availability of brownfield land.</u> <p data-bbox="577 352 1666 416">In the final paragraph on page 53 (starting “It is clear that”) add two new sentences after the first sentence as follows:</p> <p data-bbox="577 453 1666 1091">It is clear that the Core Villages identified are very varied and their needs and factors which influence what is an “appropriate level of development” will vary from village to village. <u>This is especially the case where villages are situated within environmentally and visually sensitive landscapes, particularly the AONBs, and/or where they include conservation areas and heritage assets. These landscapes and heritage assets will be key considerations in the site allocation process, and when considering planning applications.</u> Although a total number of 1050 new dwellings is indicated in Policy CS2, this includes the ten Core Villages and all the Hinterland Villages. It is therefore important that this is not viewed as a sum simply to be divided equally or randomly between the number of villages listed. The approach to the distribution of new dwellings within Policy CS2 is to be driven by the function of the villages, their role in the community, and the capacity for a particular level of growth which will be guided by many factors, which will result in a different level of development being identified as “appropriate” in different settlements, even those within the same category (see paragraph 7.3 in the Technical Background Document 2: Spatial Strategy – Version 1.1., this indicates that the Site Allocations document will also be informed by detailed assessments of a range of criteria). The approach will also provide for a degree of in-built flexibility within the catchment area.</p> <p data-bbox="577 1123 1648 1187">Add an additional sentence at the end of the final para’ under 2.8.4 preceding Policy CS6 as follows;</p> <p data-bbox="577 1224 1666 1423">It will also be important to ensure that any development in the Core and Hinterland Villages is supported by an appropriate level of infrastructure. As with the larger strategic sites provision of adequate infrastructure to serve developments will be required. In many cases this may need to be by way of a financial contribution, secured through legal agreements under section 106 of the Town and Country Planning Act, and through a mechanism known as the Community Infrastructure</p>	

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			<p>Levy (CIL) which is anticipated to be established at a later date. One of the key benefits of the approach suggested will be to enable meaningful infrastructure improvements to support development in these areas, although contributions may need to accumulate over a number of years to achieve this. The approach to infrastructure delivery will also follow the functional cluster concept, to reflect the role and relationship between settlements, particularly when it comes to the use and demand for many of the facilities which make up the infrastructure. Policy CS17 reflects this. In the case of affordable housing the policy consideration for exception schemes will operate within the context of the functional clusters, thus enabling greater flexibility and increasing the opportunities to address local housing need in some of Babergh's more rural areas. <u>In considering the cumulative impact, the findings from monitoring the impacts of previous planning applications in respect of the social, physical and environmental impacts and the effects on quality of life within the village will be considered and reflected in the assessment of new proposals.</u></p>	
28	54	2.8.4	<p>Add a new sentence after the final paragraph under paragraph 2.8.4 preceding Policy CS6 as follows:</p> <p><u>The BUABs defined in the 2006 Local Plan and later in a future DPD for Site Allocations, provide a useful starting point when considering the relationship of proposed development in relation to the existing pattern of development for that settlement and for defining the extent of its developed area and a distinction between the built up area and the countryside. Policy CS6 intentionally provides greater flexibility for appropriate development beyond these, for identified Core and Hinterland villages subject to specified criteria.</u></p>	<p>No</p> <p>The proposed supporting text to the policy provides more detail regarding the relationship of proposed development in relation to the existing pattern of development by means of addressing their cumulative effects. These modifications do not introduce any new issues or concepts into the policy. Therefore there are no implications of the proposed change on the Sustainability Appraisal.</p>

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29	54	Policy CS6	<p>Amend Policy CS6 as follows:</p> <div style="border: 1px solid black; padding: 10px;"> <p>Policy CS6: Strategy for Development for Core and Hinterland Villages</p> <p>Proposals for development for Core Villages will be approved on sites allocated in the Site Allocations DPD, and elsewhere where proposals score positively when assessed against Policy CS10 and the following matters are addressed to the satisfaction of the local planning authority (or other decision maker) where relevant and appropriate to the scale and location of the proposal:</p> <ul style="list-style-type: none"> • <u>the landscape, environmental and heritage characteristics of the village;</u> • <u>the locational context of the village and the proposed development (particularly the AONBs, Conservation Areas, and heritage assets);</u> • site location and sequential approach to site selection; • Locally identified need - housing and employment, and specific local needs such as affordable housing; • Locally identified community needs; and • Cumulative impact of development in the area <u>in respect of social, physical and environmental impacts.</u> <p>Development in Hinterland Villages will be approved where proposals are able to demonstrate a close functional relationship to the existing settlement on sites where the relevant issues listed above are addressed to the satisfaction of the local planning authority (or other decision maker) and where the proposed development:</p> <ul style="list-style-type: none"> • is well designed and appropriate in size / scale, layout and character to its setting and to the village, • is adjacent or well related to the existing pattern of development for that settlement, • meets a proven local need, such as affordable housing or </div>	<p>Yes</p> <p>The proposed additional text to the policy provides more detail regarding requirements for proposals for development for Core Villages and criteria for approval. These modifications introduce new concepts into the policy. Therefore there are likely to be positive implications of the proposed change on the Sustainability Appraisal in particular reference to landscape, environmental and historical effects of future developments.</p>

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			<p>targeted market housing identified in an adopted community local plan / neighbourhood plan,</p> <ul style="list-style-type: none"> • supports local services and/or creates or expands employment opportunities, and • does not compromise the delivery of permitted or identified schemes in adopted community / village local plans within the same functional cluster. <p>The cumulative impact of development both within the Hinterland Village in which the development is proposed and within the functional cluster of villages in which it is located will be a material consideration when assessing such proposals.</p> <p>All proposals for development in Hinterland Villages must demonstrate how they meet the criteria list above.</p> <p>The Core and Hinterland Villages identified in the Spatial Strategy provide for the day-to-day needs of local communities, and facilities and services such as shops, post offices, pubs, petrol stations, community halls, etc that provide for the needs of local communities will be safeguarded.</p> <p>New retail, leisure and community uses appropriate in scale and character to the role, function and appearance to their location will be encouraged in Core and Hinterland Villages, subject to other policies in the Core Strategy and Policies document, particularly Policy CS10, and other subsequent (adopted) documents as appropriate.</p>	

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30	60	Para 3.3.1	<p>Delete “and regional” in the paragraph headed Policy context under 3.3.1 as follows;</p> <p>The importance of the need to protect and enhance the built and natural environment has been widely acknowledged for a long time from an international to local level. As a result issues concerning the built and natural environment are thoroughly covered by legislation and policy guidance at all levels. This includes legislation at an international and national level and policies at national and regional level, the key elements of which are listed in the Environment and Climate Change Technical Background Document. The following paragraphs highlight locally important features essential to the context, history, character, appearance and future of the district, and policies for their protection.</p>	<p>No</p> <p>The proposed supporting text and the amendments to the policy wording do not introduce any new issues or concepts into the policy. Therefore these are minor modifications and have no implications of the proposed change on the Sustainability Appraisal</p>
31	68	Policy CS7	<p>Amend Policy CS7 and the supporting text preceding the policy (final paragraph at end of 3.3.7) to update and add clarity as follows;</p> <p>Large scale non-residential development proposals will be expected to provide evidence of BREEAM pre-assessment at the pre-application stage. More detailed policies on design standards will be included in the Development Management DPD. There is an expectation that minimum standards will progressively improve be improved on over time such that non-residential developments should aim to increase design standards to achieve BREEAM Excellent in 2013 rising to BREEAM “Outstanding” standard or equivalent in 2016.</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>Policy CS7: Sustainable Design and Construction Standards:</p> <p>Larger scale residential developments, particularly those within the New Directions of Growth Strategic Allocations and Broad Location for growth, will be expected to achieve the Building For Life Silver Standard. <u>In other cases (e.g. in some of the Core Villages), and where the Council consider it is viable to do so, sites where this standard can be achieved will be identified in the Site Allocations DPD.</u></p> </div>	

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			<p>All new non-residential developments will be expected to achieve, as a minimum, the BREEAM “Very Good” “<u>Excellent</u>” standard or equivalent.</p> <p>Note 1: Site specific policies for allocated sites and detailed policies for delivering sustainable design and construction and climate resilient development will be set out in Site Allocations / Development Management DPD(s). This will include guidance on the size / scale of development that relevant policies apply to, and a timetable setting out which level of the Code for Sustainable Homes (or equivalent replacement standard) the development is expected to achieve).</p> <p>Note 2: The local planning authority will determine which residential developments are considered to be “larger scale” <u>(as a guide these are likely to be larger than ‘major’ development as currently defined, but will be assessed with regard to the locality and context of the proposal).</u></p> <p>Note 3: This policy should be read in conjunction with Policy CS10 (including Note 3),</p>	
32	70	Policy CS8	<p>Amend Policy CS8 to update wording and to add clarity as follows;</p> <div data-bbox="595 866 1648 1410" style="border: 1px solid black; padding: 10px;"> <p>Policy CS8: Renewable / Low Carbon Energy</p> <p>All new development will be required to minimise dependence on fossil fuels and make the fullest contribution to the mitigation of climate change through adopting a sustainable approach to energy use.</p> <p>Development within the <u>Strategic Allocations and Broad Location for growth</u> New Directions of Growth and other large-scale development proposals will be required to use on-site renewable, decentralised, or low carbon energy sources with the aim of achieving a 10% reduction in the predicted carbon dioxide emissions of the development.</p> <p>In other cases the Council will support proposals for development that includes on-site low and zero carbon technologies including, where</p> </div>	<p>No</p> <p>The proposed amendments to the policy wording do not introduce any new issues or concepts into the policy. Therefore these are minor modifications and have no implications of the proposed change on the Sustainability Appraisal</p>

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			<p>appropriate, proposals to retro-fit existing buildings as part of schemes to extend or convert those buildings.</p> <p>Opportunities for incorporating renewable/low carbon energy provision into new development, and/or producing renewable/low carbon energy may be identified in the Site Allocations DPD.</p> <p>In all cases, the Council will encourage and support community initiatives, including linking with / contributing to the provision of local off-site renewable energy sources and the use of energy service companies (ESCOs) or similar energy saving initiatives.</p> <p>Note 1: Development such as wind turbines <u>Renewable energy proposals, including but not limited to wind turbines</u> will not automatically be viewed as sustainable sources of renewable energy, as in unsuitable locations they can result in increases in mortality among birds and bats. The impacts on receptors such as European sites will need to be considered for each individual allocation or scheme proposal. <u>Other considerations such as the impact of proposals on landscape, heritage assets and human health and well-being will also be relevant to assessing the suitability of proposals for renewable energy schemes.</u></p> <p>Note 2: The Development Management and Site Allocations <u>Future</u> DPDs will contain more detailed policies which are likely to include site specific requirements in respect of renewable energy, and the submission of Energy Statements to demonstrate that the requirements of Policy CS8 and other relevant policies have been met. In addition, the Council intends to produce further guidance on how to interpret the 10% carbon dioxide reduction requirement <u>For the time being, the 10% reduction should be calculated as the maximum level carbon dioxide emissions (or “Target Emissions Rate”) permitted under the Building Regulations Part L at the time of submission. Following the adoption of zero carbon standards (however they are ultimately defined) under Part L, the reduction should be calculated from the predicted carbon dioxide emissions after the application of energy efficiency measures that meet or exceed the minimum Fabric Energy Efficiency Standards set within Part L.</u></p> <p>Note 3: The local planning authority will determine which development proposals are considered to be “large-scale” <u>(as a guide these are likely to be larger than ‘major’ development as currently defined, but will be assessed with regard to the locality and context of the proposal).</u></p>	

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33	77	Policy CS10	<p>Make the following amendments to Policy CS10:</p> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>Policy CS10: Implementing Sustainable Development in Babergh</p> <p>Proposals for development must respect the local context and character of the different parts of the district, and where relevant should demonstrate how the proposal addresses the key issues and contributes to meeting the objectives of the this Local Plan. All new development within the district, 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 Babergh context (through the policies and proposals of this Local Plan), and in particular, and where appropriate to the scale and nature of the proposal, should:</p> <ul style="list-style-type: none"> • respect the landscape, landscape features, streetscape / townscape, historic heritage assets, important spaces and historic views; • make a positive contribution to the local character, shape and scale of the area; • protect or create jobs and sites to strengthen or diversify the local economy particularly through the potential for new employment in higher skilled occupations to help to reduce the level of out-commuting, and raise workforce skills and incomes; • ensure an appropriate level of services, facilities and infrastructure are available or provided to serve the proposed development; • retain, protect or enhance local services and facilities and rural communities; • consider the aspirations and level and range of support required to address deprivation, access to services, and the wider needs of an aging population and also those of smaller rural communities; • protect and enhance biodiversity, prioritise the use of brownfield land for development ensuring any risk of contamination is identified and adequately managed, and make efficient use of greenfield land and </div>	<p>No</p> <p>The proposed amendments to the policy provide further clarification on the application of this policy and do not introduce new issues or objectives. Therefore there are no implications of the proposed changes on the Sustainability Appraisal.</p>

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			<p>scarce resources;</p> <ul style="list-style-type: none"> • address climate change through design, adaptation, mitigation and by incorporating or producing sources of renewable or low-carbon energy; • make provision for open space, amenity, leisure and play through providing, enhancing and contributing to the green infrastructure of the district; • create green spaces and/or extend existing green infrastructure to provide opportunities for exercise and access to shady outdoor space within new developments, and increase the connectivity of habitats and the enhancement of biodiversity, and mitigate some of the impacts of climate change e.g. enhancement of natural cooling and reduction in the heat island effect, provision of pollution sequestration for the absorption of greenhouse gases, and through the design and incorporation of flood water storage areas, sustainable drainage systems (SUDs); • minimise the exposure of people and property to the risks of all sources of flooding by taking a sequential risk-based approach to development, and where appropriate, reduce overall flood risk and incorporate measures to manage and mitigate flood risk; • minimise surface water run-off and incorporate sustainable drainage systems (SUDs) where appropriate; • minimise the demand for potable water in line with, or improving on government targets, and ensure there is no deterioration of the status of the water environment in terms of water quality, water quantity and physical characteristics • minimise waste (including waste water) during construction, and promote and provide for the reduction, re-use and recycling of all types of waste from the completed development; • minimise the energy demand of the site through appropriate layout and orientation (passive design) and the use of building methods, materials and construction techniques that optimise energy efficiency and are resilient to climate change (e.g. resilience to high winds and driving rain); • promote healthy living and be accessible to people of all abilities 	

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			<p>including those with mobility impairments;</p> <ul style="list-style-type: none"> • protect air quality and ensure the implementation of the Cross Street (Sudbury) Air Quality Action Plan is not compromised • seek to minimise the need to travel by car using the following hierarchy: walking, cycling, public transport, commercial vehicles and cars) thus improving air quality; and • where appropriate to the scale of the proposal, provide a transport assessment / Travel Plan showing how car based travel to and from the site can be minimised, and proposals for the provision of infrastructure and opportunities for electric, plug-in hybrid vehicles, and car sharing schemes. <p>The production of development briefs / masterplans will be required where proposals warrant such an approach owing to the scale, location or mix of uses. A landscape/townscape appraisal, energy strategy, multifunctional green infrastructure strategy and design and a design concept statement will be essential components of development briefs and masterplans, alongside the sustainability assessments required in Policy CS7.</p> <p>Proposals for development must ensure adequate protection, enhancement, compensation and / or mitigation, as appropriate are given to distinctive local features which characterise the landscape and heritage assets of Babergh's built and natural environment within designated sites covered by statutory legislation, such as AONBs, Conservation Areas, etc. and local designations such as Special Landscape Areas and County Wildlife Sites, and also local features and habitats that fall outside these identified areas. In particular proposals should protect and where possible enhance the landscape and heritage areas including habitats and features of landscape, historic, architectural, archaeological, biological, hydrological and geological interest. Adaptation or mitigation will be required if evidence indicates there will be damaging impacts if a proposal is otherwise acceptable and granted planning permission.</p>	

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			<p>With regard to the SPAs, SACs and Ramsar sites any development that would have an adverse effect on the integrity of a European site including candidate / proposed sites either alone or in combination with other plans or projects will be refused (see Note 2).</p> <p>Note 1: Mitigation, adaptation and enhancement will need to reflect the existing landscape character and / or historic pattern / characteristics and provide relevant features appropriate to the specific area / location including habitat type, respecting the biodiversity, geodiversity or historic character of the location affected. Biodiversity in this context includes, but is not limited to, legally protected sites.</p> <p>Note 2: that is unless the project passes the tests in Regulation 62 of The Conservation of Habitats and Species Regulations 2010 as referred to above. <u>Any development proposal that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will be subject to assessment under the Habitat Regulations at Site Allocation and/or project application stage. The HRA for this Core Strategy does not obviate the need for such an assessment. If it cannot be ascertained that there would be no adverse effects on site integrity the project will be refused unless it passes the tests in Regulation 62, in which case any necessary compensatory measures will need to be secured in accordance with Regulation 66. Any development that would have an adverse effect on the integrity of a European site, either alone or in combination with other plans or projects would not be in accordance with the Core Strategy.</u></p> <p>Note 3: The Development Management and Site Allocations DPDs will contain more detailed policies which are likely to include site specific requirements in respect of sustainable design and development (including Code for Sustainable Homes levels [or equivalent replacement standard]), and the submission of Sustainability Statements to demonstrate that the requirements of Policy CS10 and other relevant policies have been met.</p>	

Mod no.	Page no.	Policy / Para or Map ref	Post Submission Modification	Impact on SA
34	89	Para 3.5.2 & Policy CS14	<p>Make the following modifications to para 3.5.2 and to Policy CS14 to reflect matters that were raised through the examination process.</p> <p>Para 3.5.2</p> <p>Nationally, and in East Anglia, Gypsy and Traveller communities are amongst the most deprived groups with poor access to accommodation, health, education, employment and other opportunities. <u>Some of the aims of the National Policy for Traveller Sites are to reduce unauthorised developments and encampments, reduce under-provision in Gypsy and Traveller accommodation and, importantly, to increase the number of traveller sites in appropriate locations with planning permission. The application of Policy CS14, plus Policies CS1 and CS10, needs to be considered within this national planning context.</u></p> <p>Gypsies, Travellers and Travelling Showpeople have their own specific accommodation needs which the Council is required to assess and address. A cross-boundary Gypsy and Traveller Accommodation Assessment for Suffolk was completed in 2007. A review is being undertaken in 2012, the results of which will inform future policy and decisions.</p> <p>The 2007 Assessment concluded that one permanent pitch is required to meet existing needs and that five sites are required throughout Suffolk (each being 8-12 pitches) to address the trend for unauthorised encampments. Whilst no additional need for permanent pitches has emerged since 2007, the trend for unauthorised encampments has continued.</p> <p>Babergh will work with Gypsy and Traveller communities, the Homes and Communities Agency (HCA), the County Council and with neighbouring authorities, to meet identified local need for permanent and transit pitches. A first step to addressing the need for transit pitches will be to identify sites and agree selection criteria with all other authorities in Suffolk</p>	<p>No</p> <p>The proposed supporting text does not introduce any new issues or objectives. The underlying principle of the policy is not amended and provides further clarification on application of this policy. Therefore there are no implications of the proposed changes on the Sustainability Appraisal.</p>

Mod no.	Page no.	Policy / Para or Map ref	Post Submission Modification	Impact on SA
			<p>Policy CS14: Mix and Types of Dwellings</p> <p>Residential development that provides for the needs of the District's population, particularly the needs of older people will be supported where such local needs exist, and at a scale appropriate to the size of the development.</p> <p><u>The mix, type and size of the housing development will be expected to reflect established needs in the Babergh district (see also Policy CS10).</u></p> <p>Development on strategic housing sites or mixed use developments with a substantial residential element will be required to make provision for the accommodation needs of vulnerable or identified groups of people, as reflected in established local needs assessments.</p> <p>New pitches / plots will be provided at an appropriate level and in suitable locations to meet the identified needs of Gypsies and Travellers / <u>Travelling Showpeople</u> in the district if these arise. The preferred approach to meeting identified needs is to be through strategic housing sites or mixed use developments or through small sites according to the settlement pattern and depending upon the nature of identified need. <u>The Council will continue to work on cross-boundary matters with neighbouring authorities to meet identified needs for transit site pitches.</u> Proposals <u>for new pitches / plots</u> will be assessed against the policies of this Local Plan (particularly Policies CS1 and CS10) and relevant policies of subsequent DPD(s).</p> <p>Note: 'strategic housing sites' are those identified in this Local Plan. This will include site allocation policies that will set out the requirements for the development, including any specific accommodation needs that have been identified through evidence based studies (such as the Housing Needs Survey/ Strategic Housing Market Assessment or Local (Parish) needs surveys). 'Accommodation needs' include the need for appropriately designed market housing, as well as a mix of social housing sizes and types designed to meet the affordable housing policy targets.</p>	

Mod no.	Page no.	Policy / Para or Map ref	Post Submission Modification	Impact on SA
35	93	Policy CS15	<p>In respect of Matter 6 (Affordable Housing), the Council wishes to promote the following modification to reflect the discussions, issues raised and questions asked by the Inspector through the examination process:</p> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>Policy CS15: Affordable Homes</p> <p>In order to promote inclusive and mixed communities all residential development* will be required to provide 35% affordable housing. Individual targets may be set for the New Directions of Strategic Broad Location for Growth and in Core / <u>Hinterland</u> Villages (Note 4) in Area Action Plan and Site Allocation DPDs.</p> <p>Where the proposed development is for only one or two dwellings¹, and where affordable homes cannot be provided on site, a commuted sum will be required². The tenure types, mixes and sizes of affordable homes will reflect established needs in the District³. The onus is on developers to provide documentary evidence to support cases where development viability is a proven issue, and where such cases are accepted the local planning authority will determine an appropriate proportion of affordable homes, tenure mix and/or appropriate levels of commuted sums on a site-by-site basis.</p> <p>Note 1: * Where a net gain of dwelling(s) is involved</p> <p>Note 2: Supplementary guidance will be produced for the time of the policy's introduction to make clear the contributions to be required and will be regularly updated</p> <p>Note 3: As reflected in the most up to date Strategic Housing Market Assessment and Tenancy Strategy or other relevant evidence</p> <p><u>Note 4: Where this is justifiable and supported by up-to-date viability evidence</u></p> </div>	

Mod no.	Page no.	Policy / Para or Map ref	Post Submission Modification	Impact on SA
36	99	Policy CS17	<p>Add the following sentence in the lower case text preceding Policy CS17</p> <p><u>Ensuring that delivery of new homes and jobs is supported by evidence based need for physical and social infrastructure required is critical to achieving successful sustainable development. Compliance with Policy CS17 is therefore crucial to the delivery of growth and particularly the implementation of policies CS3, 3a, 4, 5, 5a, 5b, 6 and 6a.</u></p>	<p>No</p> <p>The proposed supporting text adds more information to the policy and does not change the underlying principle. Therefore there are no implications of the proposed changes on the Sustainability Appraisal.</p>
37	104 & 107	Glossary	<p>Amend the following entries as follows:</p> <p>Development Plan - Under current legislation and regulations, the statutory planning framework for a particular locality (or even group of them) is made up of <u>a Local Plan and other Development Plan Documents (which may comprise one or more documents)</u> an LDF and currently the regional plan. The Localism Act Bill (2010 – 2011), when enacted, will abolish ed Regional Strategies in January 2013. (National planning policy / guidance does not form part of the statutory development plan).</p> <p>Regional Spatial Strategy (RSS) – Formerly provided The broad spatial strategy (i.e. regional plan) for the region prepared by the former East of England Regional Assembly, and that prior to January 2013, formed part of the statutory Development Plan. The East of England RSS was adopted in May 2008 and abolished following the Localism Act in January 2013. The Localism Bill, when enacted, will abolish Regional Strategies including the East of England Plan.</p>	<p>No</p> <p>This is a minor change to the explanatory text and does not introduce new issues. It addresses the changes to The East of England Regional Strategy being revoked (3rd January 2013) and the plan has been updated in the light of these changes. Therefore there are no implications of the proposed changes on the Sustainability Appraisal.</p>

Mod no.	Page no.	Policy / Para or Map ref	Post Submission Modification	Impact on SA
38		Appendix (Original Map 4)	<p>Amendment original Map 4 – Accessing Key Services (which is now an Appendix) as follows:</p> <p>Suggest adding “<u>in Babergh</u>” after “Accessing Key Services” in the title; and deletion of ‘Village Clusters’ from the key (the key is the key and doesn’t need a title).</p> <p>Delete Doctor’s Surgery at Brantham from Symbols on the Map.</p>	<p>No</p> <p>The proposed minor amendments are for the clarification purposes and do not introduce any new principles. No implications on the Sustainability Appraisal.</p>

3. May 2013 Appraisal of further Proposed Main Modifications

3.1 Table 1 identified the proposed changes which require some review of the Sustainability Appraisal assessments. Three policies were identified to have potential impact on Sustainability Appraisal – CS3, CS4 and CS6. For each of these changes a full assessment has been carried out. The results of these assessments are shown in the Table 2 below and this is also shown with the comparative scores where appropriate from the earlier assessment (as shown in the September 2011 Main SA report and June 2012 Addendum to the Main SA report).

Key for the Table 2 – Appraisal of further Proposed Main Modifications

++	In conformity with the criterion
+	Partially meets the criterion/possible in conflict with the criterion/some constraints identified
-	In conflict with the criterion
0	Not relevant to criterion/Neutral effects
?	Insufficient information is available

Table 2 – Appraisal of further Proposed Main Modifications

SA Objective		Assessment Score June 2012	Assessment Score May 2013
Findings			
Policy CS3: Chilton Woods Strategic Land Allocation and Strategy for Sudbury / Great Cornard			
Proposed Use – Mixed Use			
1	To improve the health of the population overall	++	++
2	To maintain and improve levels of education and skills in the population overall	++	++
3	To reduce crime and anti-social activity	?	?
4	To reduce poverty and social exclusion	0	0
5	To improve access to key services for all sectors of the population	+	+
6	To offer everybody the opportunity for rewarding and satisfying employment	++	++
7	To meet the housing requirements of the whole community	++	++
8	To improve the quality of where people live and to encourage community participation	++	++
9	To maintain and where possible improve water quality	+	+
10	To maintain and where possible improve air quality	++	++
11	To conserve soil resources and quality	-	-

12	To use water and mineral resources efficiently, and re-use and recycle where possible	?	?
13	To reduce waste	?	+
14	To reduce the effects of traffic on the environment	++	++
15	To reduce emissions of greenhouse gasses from energy consumption	++	++
16	To reduce vulnerability to climatic events	++	++
17	To conserve and enhance biodiversity and geodiversity	++	++
18	To conserve and where appropriate enhance areas of historical and archaeological importance	+	+
19	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	++	++
20	To achieve sustainable levels of prosperity and economic growth throughout the plan area	++	++
21	To revitalise town centres	0	0
22	To encourage efficient patterns of movement in support of economic growth	++	++
23	To encourage and accommodate both indigenous and inward investment	++	++

Summary: Most of the assessment scores are the same as the result for proposed further main modifications. The change in score against SA Objective 13 is evident due to an inclusion of additional text in the policy that addresses that particular constraint. The overall assessment for the site is generally positive, with a few neutral or mixed effects.

SA Objective		Assessment Score June 2012	Assessment Score May 2013
Findings			
Policy CS4: Strategic Growth area Allocation at Hadleigh			
Proposed Use – Mixed Use			
1	To improve the health of the population overall	++	++
2	To maintain and improve levels of education and skills in the population overall	++	++
3	To reduce crime and anti-social activity	?	+
4	To reduce poverty and social exclusion	0	0
5	To improve access to key services for all sectors of the population	+	+
6	To offer everybody the opportunity for rewarding and satisfying employment	++	++
7	To meet the housing requirements of the whole community	++	++
8	To improve the quality of where people live and to encourage community participation	++	++
9	To maintain and where possible improve water quality	++	+
10	To maintain and where possible improve air quality	++	++
11	To conserve soil resources and quality	-	-

12	To use water and mineral resources efficiently, and re-use and recycle where possible	?	?
13	To reduce waste	?	?
14	To reduce the effects of traffic on the environment	++	++
15	To reduce emissions of greenhouse gasses from energy consumption	++	++
16	To reduce vulnerability to climatic events	++	++
17	To conserve and enhance biodiversity and geodiversity	-	+
18	To conserve and where appropriate enhance areas of historical and archaeological Importance	+	+
19	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	++	++
20	To achieve sustainable levels of prosperity and economic growth throughout the plan area	++	++
21	To revitalise town centres	0	0
22	To encourage efficient patterns of movement in support of economic growth	++	++
23	To encourage and accommodate both indigenous and inward investment	++	++

Summary: Most of the assessment scores are the same as the result the proposed further main modifications. The change in score against SA Objectives 3 and 17 is due to the additional text in the policy that enhances the promotion of SA objectives for social issues and constraints for biodiversity. The overall assessment for the site is generally positive, with a few neutral or mixed effects.

SA Objective		Assessment Score June 2012	Assessment Score May 2013
Findings			
Policy CS6: Strategy for Development for Core and Hinterland Villages			
Proposed Use – Employment/Mixed Use			
1	To improve the health of the population overall	++	++
2	To maintain and improve levels of education and skills in the population overall	+	+
3	To reduce crime and anti-social activity	?	?
4	To reduce poverty and social exclusion	0	0
5	To improve access to key services for all sectors of the population	+	+
6	To offer everybody the opportunity for rewarding and satisfying employment	++	++
7	To meet the housing requirements of the whole community	+	+
8	To improve the quality of where people live and to encourage community participation	++	++
9	To maintain and where possible improve water quality	+	+
10	To maintain and where possible improve air quality	++	++
11	To conserve soil resources and quality	++	++

12	To use water and mineral resources efficiently, and re-use and recycle where possible	?	?
13	To reduce waste	?	?
14	To reduce the effects of traffic on the environment	+	++
15	To reduce emissions of greenhouse gasses from energy consumption	++	++
16	To reduce vulnerability to climatic events	-	-
17	To conserve and enhance biodiversity and geodiversity	-	-/0
18	To conserve and where appropriate enhance areas of historical and archaeological importance	+	+
19	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	-	-/0
20	To achieve sustainable levels of prosperity and economic growth throughout the plan area	++	++
21	To revitalise town centres	0	0
22	To encourage efficient patterns of movement in support of economic growth	+	+
23	To encourage and accommodate both indigenous and inward investment	++	++

Summary: Most of the assessment scores are the same as the result for proposed further main modifications. The change in score against SA Objectives 17 and 19 is evident due to the inclusion of additional text in the policy that addresses these particular constraints. The proposed further modifications put more focus on the importance of biodiversity, heritage and local distinctiveness of landscapes. The overall assessment for the site is generally positive, with a few neutral or mixed effects.

4. Changes to policies as a result of the Examination

- 4.1 Table 1 sets out all the changes to the plan that have been proposed following the Examination. In some cases the changes are very minor, rewording of policies or updating of the reasoned justification to policies. The SA has focused on the changes to the policy wording. This has resulted in changes to the sustainability appraisal of policies CS3, CS4 and CS6. Table 2 shows changes in scoring for some SA Objectives for the above policies with a summary outlining reasons for those changes.
- 4.2 The overall balance of the appraisal has not changed in its consideration of potential impacts upon the quality of life and the potential impact of traffic on air quality. The proposed further modifications to the policies have strengthened their scoring against SA objectives for biodiversity, landscape, historical and archaeological importance, waste reduction and crime reduction.
- 4.3 To address the Inspector's questions further modifications are proposed by the Council providing more detail, guidance and clarity in terms of policy application. In most cases the amendments have made the intentions clearer without significantly changing the content or principles of the policy. A reassessment of the three policies has been carried out to see if they were still in conformity with principles of sustainable development. Better scoring against certain SA objectives demonstrated that the Plan was robust in terms of its sustainability and its policies provided more certainty and clarity.

Review of Habitats Regulations Assessment

Proposed Further Main Modifications to the submitted version of the Babergh Core Strategy. (May 2013)

The HRA screening was carried out by Atkins Limited on behalf of Babergh District Council, initially with a Preliminary Review (Stage1) of Issues and Options Core Strategy Report (March 2009) and then for the Babergh Working Draft Core Strategy (May 2011) and subsequently updated for the Core Strategy Submission Draft (September 2011). A final report was provided in September 2011 which builds on a previous draft report (July 2011) in which recommendations were provided for Babergh District Council to consider and to incorporate into the Core Strategy where required, to mitigate potential issues identified during the HRA screening process. These were considered in consultation with Natural England, prior to finalisation of the Submission Draft Core Strategy and where appropriate were incorporated into the Core Strategy.

Prior to submitting the Core Strategy in November 2012, the Council proposed Modifications which were subject to consultation in the Summer 2012. These modifications were reviewed against the Habitats Regulations Assessment to identify whether the modifications required any further assessment under the Habitats Regulations. This summary is set out in the Addendum to the Sustainability Appraisal (June 2012).

The Submission Draft Babergh Core Strategy (October 2011) together with the Modifications proposed in July 2012, were subject to an Independent Examination in March 2013. Further Main Modifications are now being proposed to address issues raised by the Inspector, or matters arising from representations through the Examination process. The schedule of proposed Modifications includes changes suggested at this stage which comprise the following types;

- To provide clarification or further explanation;
- To provide context or justification;
- To address issue and / or provide further details regarding viability and deliverability;
- To update content where appropriate.

It is considered that the nature of the proposed changes do not influence the location, nature or scale of development, but instead add clarity, justification and additional details in respect of policies and proposals previously included and subject to assessment.

The proposed Modifications 25 and 26 relate to the regeneration site at Brantham and refer to a proposed site area being indicated as a proviso for potential residential development. If viability evidence for a comprehensive and integrated planning solution to the whole site suggests additional residential development on some of the adjacent Greenfield land, between the site and the village (Map F), this will be considered in relation to the benefits of the overall regeneration package. Although the reference to this was indicated in principle in the Modifications proposed in July 2012. The proposed change offers more clarity and is more explicit in spatial terms. However, the policy context included an indication that further development may be required in order to address matters of viability. The HRA screening and relevant evidence including the Water Cycle Study, took on board assumptions which acknowledged the unique issues associated with the need for regeneration of the site at Brantham to allow an informed response. On this basis, implications of growth were

assessed in the HRA, assuming a theoretical maximum number of 700 dwellings. Other assumptions were also referred to in the HRA screening including access restrictions to the estuary, open space and Local Nature Reserve provision and an indication of employment type. On this basis the assessment was sufficient to indicate that the regeneration site within Brantham could accommodate a level of new housing provision with appropriate greenspace provision. Additional wording was recommended by the HRA which was incorporated into the Submission Draft Core Strategy and remains in the policy wording. The location, scale and nature of the proposal for regeneration at Brantham under policy CS6a, as amended by the proposed modifications are unchanged, in principle from the Submission Draft Core Strategy (2011) or the Pre-submission Modifications. The HRA screening (2011) and review of the HRA (2012 Modifications), assessed all of the issues at those stages.

Conclusions

The proposed Main Modifications do not result in substantial changes to the strategy, and in particular have no impact on the level or distribution of growth of homes or jobs. The proposed changes also do not introduce any new policies or issues which have not previously been taken account of in the Habitats Regulations Assessment Screening or the review of this in respect of the pre-submission Modification proposed in July 2012.