



Babergh District Council
Sustainability Appraisal Scoping Report
Incorporating the regulations of the SEA directive

For Development Plan Documents (DPD's) and
Supplementary Planning Documents (SPD's)

Local Development Framework

Final Version Sept 2009

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1. Introduction

1.1 Background

This report is the first stage of the Sustainability Appraisal of the Babergh District Council Local Development Framework (LDF). The LDF is a set of documents, which set out policies and proposals to guide the future development of Babergh District. The Local Development Framework, in time, will replace the Babergh Local Plan, Alteration No 2, for the period 2006 -2016. The Local Plan was adopted in June 2006.

Sustainability Appraisal (SA) is a systematic process undertaken during the preparation of a local development document or strategy. Its role is to assess the extent to which the emerging policies and proposals will help to achieve relevant environmental, social and economic objectives.

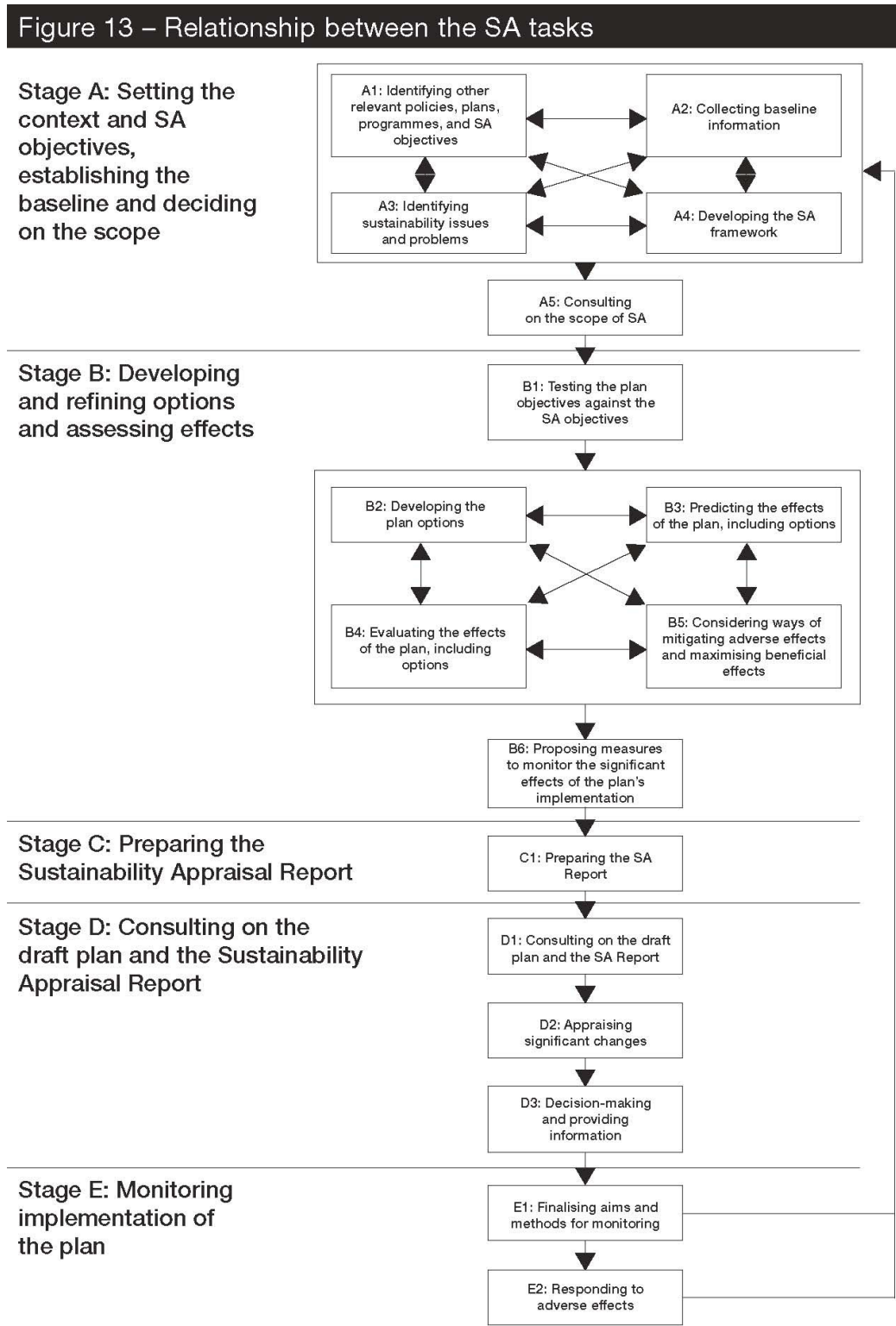
The overall aim of the appraisal process is to help ensure that Local Development Documents (LDD's) which can be Development Plan Documents (DPD's) or Supplementary Planning Documents (SPD's) contribute to 'sustainable development'. The most widely-used definition of this concept is "development that meets the needs of the present without compromising the ability of future generations to meet their own needs"¹. Another is to see sustainable development as "ensuring a better quality of life for everyone, now and for future generations".

The Government has provided guidance on how Sustainability Appraisals should be undertaken.² This guidance includes the requirement to undertake a Strategic Environmental Assessment (SEA) required by the European Directive 2001/42/EC. Figure 1 is reproduced from the guidance and shows the key stages and processes required for Sustainability Appraisal and Strategic Environmental Assessment.

¹ World Commission on Environment and Development, 1987.

² Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, (Nov 2005)

Figure 1



This report covers Stage A; setting the context and objectives, establishing the baseline. The report is structured as advised in the Guidance, and for clarity uses the same terminology and numbering. The following sections are as shown below and provide an overview of the methodology and process, while the detailed work is provided in the relevant tables in the Appendices.

- Φ A1: Identifying other relevant policies, plans, programmes and sustainability objectives;
- Φ A2: Collecting baseline information;
- Φ A3: Identifying sustainability issues and problems;
- Φ A4 Developing the Sustainability Appraisal Framework;
- Φ A5 Consulting on the scope of the Sustainability Appraisal.

1.2 Purpose

The purpose of the Scoping Report is to:

- Φ identify environmental, social and economic objectives contained in **other plans** and programmes that are relevant to the Babergh Local Development Framework;
- Φ assess the broad environmental, social and economic characteristics of Babergh District and how these may change during the period up to 2016 and as a result, identify the **key issues** that the Local Development Framework should address;
- Φ set out an appropriate **framework** for carrying out the remainder of the Sustainability Appraisal, including objectives against which draft policies and options may be assessed, and indicators against which progress towards meeting those objectives can be monitored in future.

1.3 Methodology

Figure 2, below, shows the methodology used to prepare this Scoping Report and indicates the relationship between each stage outlined above and the data tables in the Appendices. The interdependencies between the different stages, and the information they are required to share, mean that stages often overlap in their formulation.

The first stage in the scoping report's construction is two-fold; an assessment of the wider context of programmes and requirements under which the Sustainability Appraisal functions (Task A1), whilst gaining an appreciation of the character of the area and its changing environmental, social and economic conditions (Task A2).

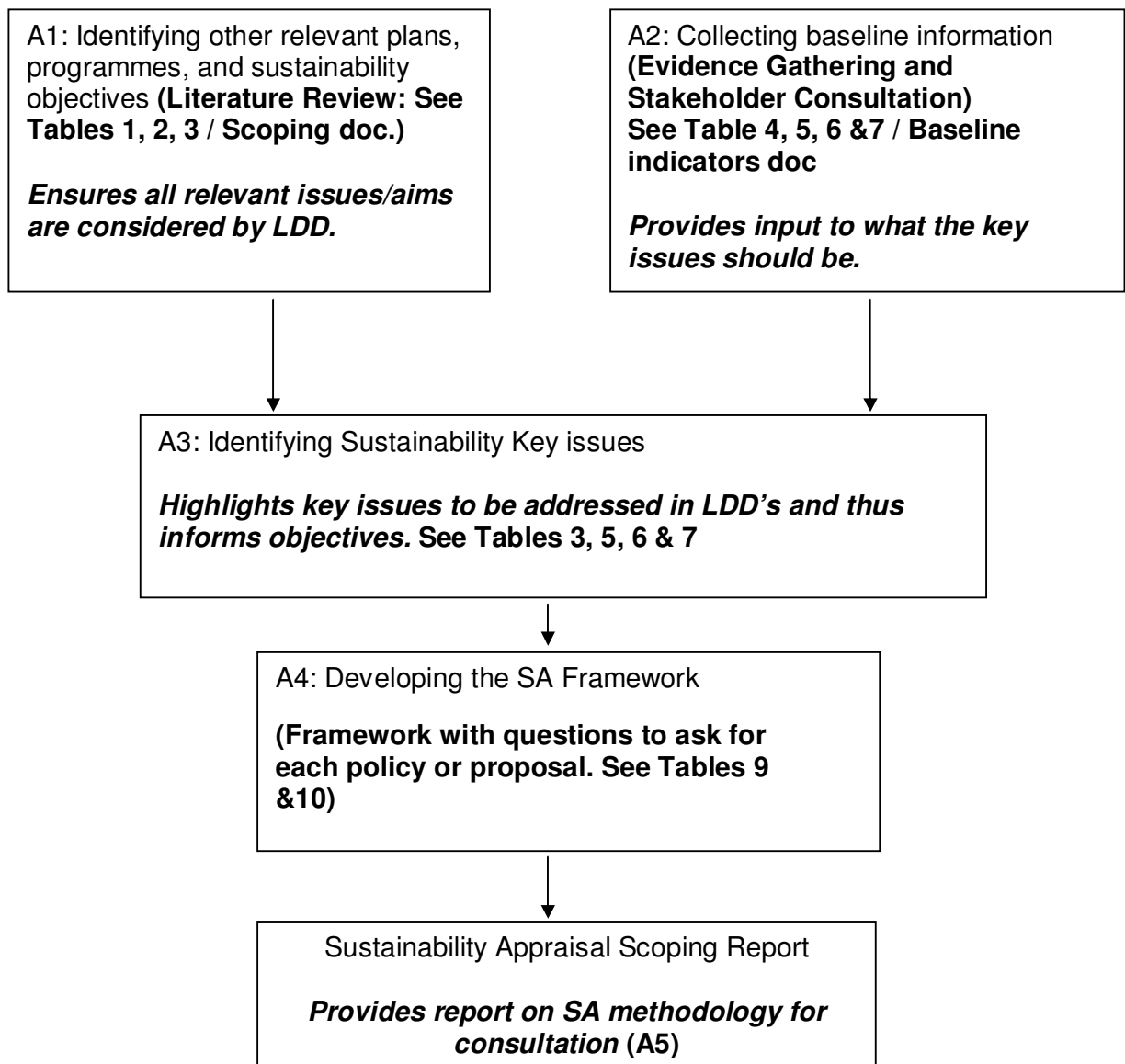
The results of these surveys can then be interpreted to identify the key issues and problems that are likely to face the area and should be addressed throughout the duration of the LDD's (DPD's or SPD's) life-span (Task A3).

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These key issues are taken as the basis around which objectives are formed to assess each policy or proposal under a Sustainability Framework. The Framework involves raising questions that will further investigate the requirements of the objectives, and a series of indicators against which the potential impacts of an LDD can be tested (Task A4). The subsequent Sustainability Appraisal Framework sets out a clear process for the appraisal of each development policy and planning option, allowing progress towards sustainable development to be monitored (Task A4).

Finally, the Sustainability Appraisal Scoping Report will help ensure the relevance and accuracy of the various stages in the methodology through the opportunity for public and stakeholder consultation (Task A5).

Figure 2: Methodology for Preparing Sustainability Appraisal Scoping Report



1.3.1 SSAG Workgroup

In 1994 Suffolk's Local Planning Authorities established a work group to compile a common methodology or approach to the sustainability appraisal (SA) of Development Plans: objectives, policies and proposals as well as to assess the impact of planning policies and decisions on progress towards sustainable development. The group has evolved to reflect changing circumstances over the years and is now called the Suffolk Sustainability Appraisal Group (SSAG). The group continues to produce annual monitoring information and a leaflet, but the main focus has recently shifted towards the statutory requirement to carry out Sustainability Appraisal (incorporating Strategic Environmental Assessment) as part of the new LDFs.

Guidance was issued by the ODPM in November 2005 (Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents). Based on this guidance, SSAG has assessed how it can work together, pool resources and share learning. The main area for joint working has been Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope of the Sustainability Appraisal. The culmination of Stage A is the production of a Scoping Report. At this Pre-Production stage of the Supplementary Planning Document (SPD) process each local authority has produced a Scoping Report. There have been several key areas of joint working that assisted all the Suffolk authorities in reaching the Scoping Report stage, including:

- ♦ identifying and reviewing of policies, plans and programmes and sustainable development objectives at County, National and International Level that will affect or influence the DPD, SPD and LDF surveys;
- ♦ collecting relevant social, environmental and economic baseline information and produce a characterisation of the District Council area;
- ♦ identifying initial issues through the analysis of trends relating to existing monitoring; and
- ♦ developing the SA framework, consisting of sustainability objectives, indicators and targets.

Appendix 1 contains a list of documents compiled by the workgroup. Early consultations regarding the draft sustainability appraisal framework for Suffolk (incorporating Strategic Environmental Assessment) and responses by the listed consultees is attached in Appendix 2.

2. Task A1: Context review

2.1 Review of Relevant Policies, Plans, Programmes and Sustainability Objectives

The starting point for preparing sustainability appraisals for DPD's and SPD's is an appraisal of the policy context in which the SA is being prepared. This means a review of other policies, plans, programmes, etc that will influence the LDF, their relationship and implications that they represent. These policies relate to international, national, regional, county and local district strategies and plans of statutory organisations. Table 1 shows a list of the relevant plans and programmes that have been reviewed.

Table 1: List of the relevant plans and programmes that were reviewed

International/European Context
The Johannesburg Declaration on Sustainable Development – Commitments arising from summit (Sept 2002) (RSS)
The UN Millennium Declaration and Millennium Development Goals (Sept 2000) (RSS)
Kyoto Protocol and the UN Framework Convention on Climate Change (May 1992) (RSS)
Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979) (RSS)
Ramsar convention on Wetlands of international importance especially as waterfowl habitat (1971) (RSS)
Bonn Convention on the Conservation of Migratory Species of Wild Animals (1979) (RSS)
European Spatial Development Perspective (May 1999)
Air Quality Framework Directive – 96/62/EC (Sept 1996) (RSS)
Directive to promote electricity from renewable energy – 2001/77/EC (2001) (RSS)
Directive for the encouragement of bio-fuels for transport – 2003/30/EC (2003) (RSS)
Water Framework Directive – 2000/60/EC (2000) (RSS)
Urban Waste Water Treatment Directive – 91/271/EEC (May 1991) (RSS)
Water pollution caused by Nitrates from agricultural sources: Nitrates Directive – 91/676/EEC (Dec 1991) (RSS)
Bathing Water Quality Directive – 76/160/EEC (1976) (RSS)
Bathing Water Quality Directive – 2006/7/EC (2006) (RSS)
Drinking Water Directive – 98/83/EC (Nov 1998) (RSS)
Strategic Environmental Assessment 2001/42/EC (2001) (RSS)
Environmental Impact Assessment 85/337/EEC (June 1985) (RSS)
Directive 79/409/EEC on the Conservation of Wild Birds, as amended (April 1979) (RSS)
Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (May 1992) (RSS)
Directive 2006/12/EC on waste (April 2006) (Codified version of: Framework Waste directive 75/442/EEC, as amended) (RSS)
Directive 99/31/EC on the landfill of waste (April 1999) (RSS)
Directive 2008/50/EC on ambient air quality and cleaner air for Europe (June 2008)

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Directive 2009/28/EC on the promotion of the use of energy from renewable sources and amending subsequently repealing Directives 2001/77/EC and 2003/30/EC (June 2009)
Packaging and packaging waste directive – 94/62/EC (Dec 1994) (RSS)
A New Partnership for Cohesion – Third Report on Economic and Social Cohesion (Feb 2004) and Draft New Regulations for Renewed Structural Funds (July 2004)
Aarhus Convention on access to information, public participation in decision-making and access to justice in environmental matters (June 1998)
EU Sixth Environmental Action Programme (2002-2012)
Waste Incineration Directive (2000/76/EC) (Dec 2000)
End of Life vehicles Directive 2000/53/EC (implemented April 2002)
Waste Electrical & Electronic Equipment Directive 2002/96/EC (implemented Feb 2003)
National, Regional and Local Context (Generic)
National Planning Policy Guidance and Planning Policy Statements
PPS1 – Creating Sustainable Communities (Feb 2004), Supplement to PPS1 - Planning and Climate Change (Dec 2007), and A supplement to PPS1 – Eco-towns (July 2009)
PPG2 – Green Belts (Jan 1995)
PPS3 – Housing (Nov 2006)
PPS4 – Planning for Sustainable Economic Growth (Dec 2009)
PPS 5 – Planning for the Historic Environment (Mar 2010)
Draft PPS – Planning for a Natural and Healthy Environment (Mar 2010)
PPS7 – Sustainable Development in Rural Areas (Aug 2004)
PPG8 – Telecommunications (Aug 2001)
PPS9 – Biodiversity and Geological Conservation (Aug 2005)
PPS10 – Planning for Sustainable Waste Management (July 2005)
PPS11 – Regional Spatial Strategies (Sept 2004)
PPS12 – Local Spatial Planning (June 2008)
PPG13 – Transport (Apr 2001)
PPG14 - Development on Unstable Land (Apr 1990)
PPG17 – Planning for Open Space, Sport and Recreation (July 2002) (RSS)
PPG18 – Enforcing Planning Control (Dec 1991)
PPG19 – Outdoor Advertisement Control (Mar 1992)
PPG20 – Coastal Planning (Oct 1992)
Review of PPG21 – Tourism: consultation (Mar 2003)
PPS22 – Renewable Energy (Aug 2004)
PPS23 – Planning and Pollution Control (Nov 2004)
PPG24 – Planning and Noise (Oct 1994)
PPS25 – Development and Flood Risk (Mar 2010), and PPS25 Supplement: Development and Coastal Change (Mar 2010)
MPS 1: Planning & Minerals (Nov 2006)
Urban
Urban White Paper (2000)

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Towns and Cities Strategy and Action Plan, Urban Renaissance in the East of England (2003) (RSS)
Rural
Government Rural White Paper: Our Countryside – the future – a fair deal for rural England, DETR (2000) (RSS)
Countryside and Rights Of Way Act (2000)
Rural Strategy DEFRA (2004)
Sustainable Communities
The UK Government Sustainability Development Strategy: Securing The Future (Mar 2005)
Sustainable Communities Plan: Building for the Future (2003) (RSS)
A Sustainable Development Framework for the East of England (Oct 2001) (RSS)
Sustainable Communities in the East of England (2003)
A Better Quality of Life: a Strategy for Sustainable Development in the UK (1999)
Creating Sustainable Communities – In the East of England (Jan 2005)
Regional Spatial Strategy
Regional Spatial Strategy – RSS, The East of England Plan (2008)
A Revision to the Regional Spatial Strategy for the East of England, Accommodation for Gypsies and Travellers and Travelling Showpeople in the East of England (July 2009)
RSS14 for the East of England SEA Scoping Report (17 Sept 2004)
Other Regional Strategies
An Integrated Regional Strategy for the East of England (Feb 05)
East of England European Strategy 2003 – 2004, (June 2003) (RSS)
Towards Sustainable Construction – A Strategy for the East of England, Draft (2003) (RSS)
Regeneration
Community Energy Project in Sudbury (2000 – 2003)
Glemsford, Heritage Economic Regeneration Scheme (2000 – 2003)
Sudbury, Heritage Economic Regeneration Scheme (2003 – 2006)
Pin Mill Regeneration (2006 - 2010)
Anglia Estate, Great Cornard, Regeneration (2005 – 2007)
Sudbury Market Town Partnership (2004 -)
Transport
Aviation White Paper (Dec 2003)
Government/DfT 10 Year Transport Plan 2000 (RSS)
East of England Regional Transport Strategy (April 2003) (Incorporated as a chapter in RPG14) (RSS)
The Future of Rail, White Paper (July 2004)
The Future of Transport: a network for 2030. White Paper (2004)
Suffolk Country Council, Local Transport Plan 2006-2011 (2006)
Suffolk Bus Strategy, 2006 – 2011 (Mar 06)
Local Transport Action Plan for Sudbury and Great Cornard (2006)
Local Transport Action Plan for Capel St Mary (2006)
Community Strategies and Community Development Strategies
Altogether a better Suffolk – Suffolk's Community Strategy 2004

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Transforming Suffolk, Suffolk's Community Strategy 2008 to 2028
Western Suffolk Local Strategic Partnership: Community Strategy 2006 to 2016 (2006)
Babergh East Local Strategic Partnership – Community Plan 2008 to 2010
Suffolk Structure Plan
Suffolk Structure Plan – 2001 All but the 11 'saved' policies were replaced by the RSS
Neighbouring Authority and National Park Local Plans/Local Development Documents
Mid Suffolk District Council, Adopted Core Strategy (Sept 2008)
St Edmundsbury Borough Council, Core Strategy Submission Document (Jan 2010)
Ipswich Borough Council, Proposed Submission Core Strategy and Policies (Sept 2009)
Suffolk Coastal District Council, Core Strategy & Development Management Policies, Pre-Submission Document (Mar 2010)
Tendring District Council, Core Strategy Discussion Document, Issues and Possible Options (Mar 2009)
Braintree District Council, Core Strategy Submission Draft (Feb 2010)
Colchester Borough Council, Adopted Core Strategy (Dec 2008)
Local Authority Corporate Plans and Strategies
Babergh DC, Strategic Plan 2008 - 2018
Babergh 5 year Capital Strategy (2007)
Public Service Agreements 2008 - 2011
Suffolk County Council Corporate Plan 2006/08
Local Area Agreement: Suffolk 2005-2008
Suffolk County Council Policy and Performance Plan 2005/6
Best Value Performance Plan for Babergh, 2003/2004
Babergh Local Plan, Alteration No. 2 (June 2006)
Pathfinder Strategy Babergh (2007)
Social – National, Regional and Local Context
Social Inclusion
Regional Social Strategy for the East of England (May 2004 but RSS scoped March 2004 version?)
Babergh District Council, Race Equality Scheme 2005
Social Inclusion and Community Cohesion Strategy 2008 -2010 (SCC)
Suffolk County Council Equalities Policy (Apr 2003)
Youth Strategy for Babergh (Jun 2004)
Health
Choosing Health: Making healthy choices easier (Nov 2004)
Healthy Futures A Regional Health Strategy for the East of England 2005 – 2010 (May 2006)
Social Care Annual Plan 2003-4
Joint Strategic Needs Assessment for Suffolk 2008 - 2011
Local NHS Plan (2000)
Suffolk Health Improvement Plan (2001)
Local Health Improvement Plan (2001)

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Culture
A Better Life: The role of culture in the sustainable development of the East of England (EERA, Sept 06)
Culture: a catalyst for change. A Strategy for Cultural Development for the East of England, Living East (Jun 2004)
A Cultural Strategy for Suffolk (Mar 2002)
District Cultural Strategy – Babergh, 2001-2006
Education
Suffolk's Strategy for Learning 2004-9: The Single Plan (Mar 2004)
Suffolk 14-19 Strategy (2004)
School Organisation Plan 2006 – 2011 August 2006
Suffolk Children and Young Peoples Plan 2006 - 2009
Housing
Code for Sustainable Homes (Feb 2008)
Regional Housing Strategy for the East of England 2005-2010 (July 2005)
Affordable Housing Study: The Provision of Affordable Housing in the East of England 1996-2021 (2003) (RSS)
Suffolk Supporting People Five Year Strategy 2005-2010 (Aug 2005)
Circular 01/06 (ODPM): Planning for Gypsy and Traveller Caravan Sites (Feb 2006)
Babergh Housing Strategy 2004 - 2009
Babergh Homelessness Review and Strategy 2003
Babergh Housing Needs Surveys, 2004 and 2008
Babergh Housing Supply and demands analysis, 2004
Ipswich Housing Market Area, Strategic Housing Market Assessment 2008
East of England Affordable Housing Study Stage 2: Provision for Key workers and Unmet Housing Need
Community Safety
Suffolk Community Safety Strategy, 2001 (Draft)
District Crime and Disorder Reduction Strategy 2002-2005
Crime & Disorder Reduction Partnership Strategy 2005 - 2008
Environmental - National, Regional and Local Context
Environmental Strategies
Environment, Our future: Regional Environment Strategy for the East of England, East of England Regional Assembly and East of England Environment Forum, July 2003 (RSS)
Soil
Farming and Food Strategy, Facing the Future, DEFRA, (Dec 2002)
The First Soil Action Plan for England: 2004 – 2006 (2004)
Contaminated Land Strategy, Babergh DC (Apr 2009)
Open Space
Draft Study of Existing Outdoor Playing Space for Children within Babergh District Council, 2004
Climate
Building a Greener Future: Towards Zero Carbon Development (DCLG) (Dec 2006)

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Climate Change – UK Programme, 2006 (Mar 06)
Living with Climate Change in the East of England – summary Report supported by technical report (2003) (RSS)
Nottingham Declaration on climate change (Oct 2000)
Air Quality
National Air Quality Strategy for England, Wales, Scotland and Northern Ireland (Jan 2000) (RSS)
Report on the updating and screening assessment of Air Quality in the Babergh District (July 2003)
Water
Water Framework Directive – Initial Advice to Local Planning Authorities in England and Wales (Environment Agency) (Feb 2006)
North Essex Catchment Flood Management Plan (Dec 2009)
East Suffolk Catchment Flood Management Plan, Draft Plan (June 2008)
Babergh DC Strategic Flood Risk Assessment (2009)
Water for people and the environment: Water resources strategy Regional action plan for Anglian Region (Environment Agency) (Dec 2009)
Suffolk Shoreline Management Plan (Jan 2010)
Biodiversity and Nature Conservation
The UK Biodiversity Action Plan 1994
Working with the Grain of Nature: A Biodiversity Strategy for England (2002) RSS DR
Wildlife and Countryside Act (1981, as amended) (RSS)
Butterfly Conservation – Regional Action Plan for Anglia (2000)
Circular 06/2005 (ODPM): Biodiversity and Geological Conservation – Statutory obligations and their impact within the planning system (Aug 2005)
BSI PAS 2010 (2006)
Suffolk Local Geodiversity Action Plan (Mar 2006)
State of Nature-Lowlands-future landscapes for wildlife (2004) (RSS)
Suffolk Biodiversity Action Plan, Being Updated (August 06)
Countryside Management
Dedham Vale AONB and Stour Valley Management Plan 2010 - 2015
Suffolk Coast and Heaths AONB Management Plan 2008 - 2013
The Stour and Orwell Estuaries: scheme of management, and management strategy (Suffolk Coasts and Heaths) (2010)
Suffolk Countryside Strategy (2000)
Babergh Countryside Strategy, (unpublished 1997)
Greenways Countryside Project, Management Strategy 2005 – 2010 (2005)
'In Step with Suffolk' Rights of Way Improvement Plan 2006 – 2016 (SCC) (2006)
Woodland
Keepers of Time – A statement of Policy for England's Ancient and Native Woodlands: Action Plan 2005
Woodland for Life: The Regional Woodland Strategy for the East of England, November 2003 (RSS)
A Strategy for England's Trees, Woods and Forests (DEFRA 2007)
Minerals and Waste
Suffolk Minerals Local Plan Adopted (May 1999)

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MPS 1 – Planning and Minerals (Nov 2006)
Regional Waste Management Strategy (2002) (RSS)
Suffolk Waste Local Plan (Feb 2006)
Joint Municipal Waste Management Strategy for Suffolk (Oct 2003)
Economic - National, Regional and Local Context
Economic and Employment Strategies
Regional Economic Strategy for the East of England – A Shared Vision (Nov 2004)
Prioritisation in the East of England, June 2003 (RSS)
Regional Emphasis Document SR2004, December 2003 (RSS)
Framework for Regional Employment and Skills Action (FRESA) (RSS) (2003)
International Business Strategy, Consultation Draft, December 2003 (RSS)
Suffolk Rural Action Plan, March 2006
Expanding Suffolk's Horizons: 2004-7 – A New Economic Strategy for Suffolk (2004)
Babergh Economic Development Programme 2006/07-2008/09
Tourism
Regional Tourism Strategy 2008-2010
Tomorrows Tourism Today (August 2004)
Sustainable Tourism Strategy for the East of England (March 2004)
Good Practice Guide on Planning for Tourism (DCLG May 2005)
Sport
East of England Plan For Sport (2004)

The scoped form of most of the above documents can be seen on the following Website: www.suffolk.gov.uk/PlanningAndBuilding/PlanningPolicy/SustainabilityAppraisalAndStrategicEnvironmentalAssessment.htm

The above mentioned documents were reviewed in terms of the following:

- Φ Document name and reference points
- Φ Key objectives, targets and indicators relevant to the LDF and the SA
- Φ Implications for the Plan
- Φ Implications for SA

An example of the review of one document is PPS 1: Creating Sustainable Communities, which is provided in Table 2. Table 3 contains a summary of all the key aims of sustainable development, set out in the scoping document that are relevant to the Babergh District Council LDF documents.

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Table 2: Review of PPS 1: Creating Sustainable Communities as contained in the scoping document

KEY OBJECTIVES, TARGETS AND INDICATORS RELEVANT TO PLAN AND SA	DOCUMENT TITLE AND REFERENCE POINTS	IMPLICATIONS FOR PLAN	IMPLICATIONS FOR SA
PPS1 – Creating Sustainable Communities (Feb 04)	Para. 4	These aims must be reflected in the DPD's and Sustainability Objectives.	Aims should be reflected in Objectives, sustainability framework and appraisal.
Sustainable development is the core principal underpinning planning.	Para. 5	As before	Aims should be reflected in Objectives, sustainability framework and appraisal.
<p>The Government set out four aims for sustainable development in its 1999 strategy. These are</p> <ul style="list-style-type: none"> • social progress which recognises the needs of everyone • effective protection of the environment • the prudent use of natural resources, and • the maintenance of high and stable levels of economic growth and employment <p>These aims should be pursued in an integrated way through a sustainable, innovative and productive economy that delivers high levels of employment, and a just society that promotes social inclusion, sustainable communities and personal well being, in ways that protect and enhance the physical environment and optimise resource and energy use.</p>	Para 14 Social Cohesion and Inclusion	As above. Also objectives should focus on building socially inclusive communities	Include access to services into Sustainability Objectives and Sustainability Framework and Appraisal.
<p>Planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by:</p> <ul style="list-style-type: none"> • making suitable land available for development in line with economic, social and environmental objectives to improve peoples quality of life 	Para 17	Reinforces the need to improve as well as protect the environment.	Ensure the historic and natural environment is considered with objectives that are inclusive of design, public space and conservation.

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KEY OBJECTIVES, TARGETS AND INDICATORS RELEVANT TO PLAN AND SA	DOCUMENT TITLE AND REFERENCE POINTS	IMPLICATIONS FOR PLAN	IMPLICATIONS FOR SA
<ul style="list-style-type: none"> • contributing to sustainable economic development • protecting and enhancing the natural and historic environment, the quality and character of the countryside and existing communities; • ensuring high quality development through good inclusive design, and the efficient use of resources; and • ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community 			
<p>Development plans should promote development that creates socially inclusive communities, including suitable mixes of housing. Plan policies should:</p> <ul style="list-style-type: none"> • ensure that the impact of development on the social fabric of communities is considered and taken into account • seek to reduce social inequalities • address both accessibility (both in terms of location and physical access) for all members of the community to jobs, health, housing, education, shops, leisure and community facilities; • take into account the needs of all the community, including particular requirements relating to age, sex, ethnic background, religion, disability or income. • deliver safe, healthy and attractive places to live; and • support the promotion of health and well being by making provision for physical activity 	<p>Para 21</p>	<p>Encourages prudent use of resources in objectives</p>	<p>Reflect prudent use of resources in Sustainability Objectives.</p>

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KEY OBJECTIVES, TARGETS AND INDICATORS RELEVANT TO PLAN AND SA	DOCUMENT TITLE AND REFERENCE POINTS	IMPLICATIONS FOR PLAN	IMPLICATIONS FOR SA
<p>Planning policies should seek to protect and enhance the quality, character and amenity value of the countryside and urban areas as a whole. A high level of protection should be given to most valued townscape and landscapes, wildlife habitats and natural resources.</p> <p>Planning should seek to maintain and improve the local environment and built help mitigate the effects of declining environmental quality through positive policies on issues such as design, conservation and the provision of public space.</p>	<p>Para 23</p>	<p>Reflect sustainable economic development in Objectives</p>	<p>Reflect these Objectives in Sustainability Objectives and Framework.</p>
<p>Development Plan Policies should seek to minimise the need to consume new resources over lifetime of development by making more efficient use or re-use of existing resources, rather than making new demands on the environment; & should seek to promote and encourage, rather than restrict, the use of renewable resources.</p>	<p>Para 24</p>	<p>Reinforces need to consider economic, social and environmental factors on an equal weighting.</p>	<p>Reflect in SA Framework, objectives and appraisal.</p>
<p>Sustainable Economic Development Planning authorities should:</p> <ul style="list-style-type: none"> • recognise that economic development can deliver environmental and social benefits • recognise the wider sub-regional, regional or national benefits of economic development & consider these alongside any adverse local impacts • ensure that suitable location are available for industrial, commercial, retail, public sector (e.g. health and education) tourism & leisure developments, so that the economy can prosper • provide for improved productivity, choice and competition, particularly when technology and other requirements of modern business are changing rapidly; 	<p>Para 32</p>		<p>Reflect equally environmental, economic and social perspectives in SA framework, objectives and appraisal.</p>

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KEY OBJECTIVES, TARGETS AND INDICATORS RELEVANT TO PLAN AND SA	DOCUMENT TITLE AND REFERENCE POINTS	IMPLICATIONS FOR PLAN	IMPLICATIONS FOR SA
<ul style="list-style-type: none"> • recognise that all local economic are subject to change; planning authorities should be sensitive to these changes and the implications for development and growth; • Actively promote and facilitate good quality development, which is sustainable and consistent with their plans; • Ensure the provision of sufficient, good quality, new homes (including an appropriate mix of housing and adequate levels of affordable housing) in suitable locations, whether through new development or the conversion of existing buildings. The aim should be to ensure that everyone has the opportunity of a decent home, in location's that reduce the need to travel. • Ensure that infrastructure and services are provided to support new and existing economic development and housing. • Ensure that development plans take account of the regional economic strategies of RDA, regional housing strategies, local authority community strategies and local economic strategies; and • Identify opportunities for future investment to deliver economic objectives 			
<p>Integrating the four aims of sustainable development.</p> <p>Planning authorities should ensure that sustainable development is treated in an integrated way in their development plans. In particular, they should carefully consider the inter-relationship between social inclusion, protecting and enhancing the environment, the prudent use of resources and economic development.</p>	<p>Para 33</p>	<p>Consider high quality design in development of sustainability in the region</p>	<p>Reflect good quality design issues in SA Framework, objectives and appraisal.</p>

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KEY OBJECTIVES, TARGETS AND INDICATORS RELEVANT TO PLAN AND SA	DOCUMENT TITLE AND REFERENCE POINTS	IMPLICATIONS FOR PLAN	IMPLICATIONS FOR SA
Spatial plans must set a clear vision for the future pattern of development, with clear objectives for achieving that vision and strategies for delivery and implementation. Plan policies must be set out clearly, with indicators against which progress can be measured.	Para 42	Reinforces the need to consider community involvement	Ensure LSP and Cooperate Objectives have been covered in SA Framework, objectives and appraisal criteria.
Planning Authorities should plan positively for the achievement of high quality and inclusive design for all development.			
Community Involvement - Planning authorities should build a clear understanding of the make-up, interests and needs of their communities in their areas.			

2.2 Sustainability Objectives and Strategic Environmental Assessment

The literature review was undertaken in order to establish those issues of sustainable development which should be examined by policies for the Babergh District. By testing those criteria, in the form of Sustainability Appraisal objectives or targets and related investigative decision making criteria questions (both developed under production stage A4), it is possible to establish whether any inconsistencies need to be addressed or constraints applied in production of local development policies.

To fulfil the requirements of the SEA Directive, the Sustainability Appraisal objectives must cover biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, landscape and interrelations between them.

The implications of the literature review, below, and the baseline information that is gathered under production stage A3, are combined to identify any significant areas of sustainable development that may require specific attention under the Local Development Framework for the Babergh District. These are further developed with an analysis made for their possible mitigation under production stage A4.

There are 23 objectives and these have been evaluated in a compatibility matrix in Table 8. The number of objectives was reduced when two indicators relating to mineral and water resources were amalgamated to form objective 11, but has now returned to 23 with the separation of air and water. There have also been changes to some sub-objectives and indicators.

Table 3: Key Sustainability Objectives for Babergh District Council LDF documents agreed as a result of the SSAG review exercise (contained in Appendix 3).

Social

1. To improve the health of the population overall
2. To maintain and improve levels of education and skills in the population overall
3. To reduce crime and anti-social activity
4. To reduce poverty and social exclusion
5. To improve access to key services for all sectors of the population
6. To offer everybody the opportunity for rewarding and satisfying employment
7. To meet the housing requirements of the whole community
8. To improve the quality of where people live and to encourage community participation

Environmental

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 contributions to climate change
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 townscape

Economic

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

3. Task A2: A profile of Babergh District - baseline information and analysis of trends

Baseline information provides a platform for predicting and monitoring any effects that a Development Plan Document (DPD) or Supplementary Planning Document (SPD) may have, helping to identify sustainability problems and their possible solutions. This will show present conditions and forecasts for the future state of the area affected by the proposed DPD or SPD in order to allow the effects of the DPD or SPD to be adequately predicted. The collation of social, environmental and economic information will help build a characterisation of the DPD / SPD area, or spatial portrait, below. This is the section that will allow us to identify the platform from which we derive our sustainability appraisal objectives and questions that will be used to test the DPD or SPD against.

3.1 Methodology

The baseline information was gathered around the sustainability topics identified in the SEA and literature review. The SSAG workgroup refined and adapted relevant social, environmental and economic baseline information previously gathered for the 'Suffolk's Environment towards sustainable development' report in order to produce a characterisation of the area. The baseline report is in a table format and sets out baseline data, targets, past trends and issues regarding sustainability. Table 4 contains a list of the baseline indicators that were gathered. A complete baseline report covering Suffolk as a whole and each district in Suffolk is available and was produced separately to this report. A summary of the key impacts is provided in Tables 5, 6 and 7. It should be noted that not all the information was readily available and some measures have been taken to collect the information for future reference.

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Table 4: List of Baseline Indicators Monitored

Headline Objective	Sub-Objective	Indicator
Social Objectives		
To improve the health of the population overall	Will it improve access to high quality, health facilities?	Proportion of population with access to hospital or GP or dentist surgery (DfT accessibility indicators - define access)
	Will it reduce death rates?	Overall death rate by all causes (PCT)
		Cancer deaths (malignant neoplasms) under 75 per 100,000 population (PCT)
		Ischaemic Heart Disease deaths under 75 per 100,000 population (PCT)
		Respiratory disease deaths (all ages) per 100,000 population (PCT)
		Deaths from self harm and injury undetermined (all ages) per 100,000 population (PCT)
		Number of people killed and seriously injured in road traffic accidents per 100,000 population (SCC)
Life expectancy (SDA)		
To improve the health of the population overall	Will it encourage healthy lifestyles?	Proportion of journeys to work on foot or by cycle (Census/SCC)
		How do children travel to school? (QOL/BVPI)
		Obesity in the population (PCT)
		Change in existing provision of outdoor playing space (youth and adult space) (SSAG 5-year review)
		Change in existing provision of children's play space (SSAG 5-year review)
		Change in provision of open space (District open space assessments)
		The % of total length of footpaths and other rights of way which are easy to use by members of the public (BVPI)
To maintain and improve levels of education and skills in the population overall	Will it improve qualifications and skills of young people?	Proportion of Year 11 pupils gaining 5+ A*-C grades at GCSE (District Wide SDA / BVPI)
	Will it improve qualifications & skills of adults?	Average point score per student at A and AS Level (District Wide SDA / BVPI)
		Proportion of the population with no qualifications (Census)
		Proportion of the population with NVQ level 4 or higher (District Wide SDA)
To reduce crime and anti-social activity	Will it reduce actual levels of crime?	Recorded Crime per 1000 population (SSAG)
		Burglary Rate (SDA)
		Violent Crime Rate (SDA)
	Will it reduce fear of crime?	Fear of Crime (QOL, Suffolk Speaks, British Crime Survey)
	Will it reduce noise & odour concerns?	Number of noise complaints (Environmental Health Depts Districts) Number of odour complaints (Environmental Health Depts Districts)
To reduce poverty and social exclusion	Will it reduce poverty & social exclusion in those areas most affected?	Proportion of the population who live in wards that rank within the most deprived 10% and 25% of wards in the country (SCC)
		Housing benefit recipients (LAs)

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Headline Objective	Sub-Objective	Indicator
To improve access to key services for all sectors of the population	Will it improve accessibility to key local services?	Percentage of rural population living in parishes which have a food shop or general store, post office, pub, primary school and meeting place (SSAG)
		Proportion of population with access to key local services (eg GP, post office) (DfT accessibility indicators) - define access
	Will it improve accessibility to shopping facilities?	New Retail Floor Space in Town Centres (AMR)
		Proportion of population with access to a food shop (DfT accessibility indicators) – (those living within 30 minutes of key services by public transport)
	Will it improve access to child care?	Number of child care places per thousand children under 5 (SCC)
To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce unemployment overall?	Unemployment rate (SSAG/AMR)
	Will it reduce long-term unemployment?	Long term unemployment (Nomis)
	Will it provide job opportunities for those most in need of employment?	Proportion of lone parents and long term-ill who are economically active (Census)
	Will it help to improve earnings?	Average Earnings (Inland revenue/AMR)
To meet the housing requirements of the whole community	Will it reduce homelessness?	Homelessness (districts homelessness presentations)
	Will it provide enough housing	Housing Stock (SSAG)
		Housing Land Availability (SSAG)
		Affordable Housing (SSAG)
	Will it increase the range & affordability of housing for all social groups?	Special Needs Housing
		Housing Types and Sizes (SSAG)
		Dwellings per hectare of Net Developable Area (SSAG)
	Average property price to income ratio (SSAG)	
Will it reduce the number of unfit homes?	Number of unfit homes per 1,000 dwellings (BVPI) (decent homes standard for LA/housing stock - private?)	
To improve the quality of where people live and to encourage community participation	Will it improve the satisfaction of people with their neighbourhood as a place to live?	% of residents who are happy with their neighbourhood as a place to live (Suffolk Speaks/ODPM QOL surveys)
	Will it increase access to natural green space?	Area of land managed in whole or part for its ecological interest and with public access over and above public rights of way (SCC)
		Areas of deficiency in terms of natural green space (SCC)
	Change in amount of accessible natural green space (Natural England standards)	

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Headline Objective	Sub-Objective	Indicator
	Will it encourage engagement in decision making?	Electoral turnout in local authority elections
		Number of Parish Plans adopted (Suffolk Acre)
	Will it increase the number of people involved in volunteer activities?	Number of people involved in volunteer activities (SCC/CVS)
	Will it improve ethnic relations?	Number / rate of racist incidents (Racial Harassment Initiative)
	Will it improve access to cultural facilities?	Number of visits to/uses of Council funded or part- funded museums per 1,000 population (BVPI 170a)
		Number of visits to Council funded or part- funded museums that were in person, per 1,000 population (BVPI 170b)
The number of pupils visiting museums and galleries in organised school groups (BVPI 170c)		
Environmental Objectives		
To maintain and where possible improve water quality	Will it improve the quality of inland waters?	Water quality in rivers (EA)
		Groundwater quality (may be available from EA in future - CAMS)
	Will it improve the quality of coastal waters?	Water quality in estuaries (EA)
		Bathing water quality (EA)
To maintain and where possible improve air quality	Will it improve air quality?	Have annual mean concentrations of any of 3 pollutants been exceeded?
		Number of Air Quality Management Areas and dwellings affected (SSAG)
To conserve soil resources and quality	Will it minimise the loss of greenfield land to development?	Number and percentage of new dwellings completed on greenfield land
		Number and percentage of existing housing commitments on greenfield land (SSAG)
		Dwellings per hectare of net developable area (SSAG)
	Will it minimise loss of the best and most versatile agricultural land to development?	Allocations on best and most versatile agricultural land (grades 1, 2, and 3)
	Will it maintain and enhance soil quality?	Number and area of potential and declared contaminated land returned to beneficial use (Districts / EA)
Number / area of organic farms (Natural England/ Soil Association)		
To use water and mineral resources efficiently, and re-use and recycle where possible	Will it promote sustainable use of minerals?	Recycled aggregate production (SSAG)
	Will it promote sustainable use of water?	Water consumption data for Suffolk not available. Depends what EA could supply. Possible link to efficient use of water through reuse or reduction of need appliances, buildings etc)??
	Will it maintain water availability for water dependant habitats?	Water availability for water dependant habitats (Wetland Habitat Working Group)
To reduce waste	Will it reduce household waste?	Household (and municipal) waste produced (SSAG)

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Headline Objective	Sub-Objective	Indicator
	Will it increase waste recovery and recycling?	Tonnage / proportion of household (and municipal) waste recycled, composted and landfilled (SSAG / BVPI / PSA)
To reduce the effects of traffic on the environment	Will it affect traffic volumes?	Traffic volumes in key locations (SCC)
	Will it reduce the need for local travel?	Percentage of all new residential development taking place in major towns, other towns, and elsewhere (SSAG)
		Percentage of rural population living in parishes which have a food shop or general store, post office, pub, primary school and meeting place (SSAG)
		Distance to key services (new accessibility indicators from DfT)
	Will it increase the proportion of journeys made using modes other than the private car?	Percentage of journeys to work undertaken by sustainable modes (SSAG)
		Percentage of schoolchildren travelling to school by sustainable modes (BVPI)
	Car parking standards (SSAG)	
To reduce emissions of greenhouse gases from energy consumption	Will it reduce emissions of green house gases by reducing energy consumption?	Consumption of electricity - Domestic use per consumer and total commercial /industrial use
		Consumption of gas - Domestic use per consumer and total commercial /industrial use
	Energy efficiency of homes (BVPI 63 / HECA)	
	Will it increase the proportion of energy needs being met by renewable sources?	Installed electricity generating capacity using renewable energy (SSAG)
To reduce vulnerability to climatic events	Will it minimise the risk of flooding to people and property from rivers & watercourses?	Flood risk - planning applications approved against Environment Agency advice (SSAG)
		Properties at risk of flooding (EA)
		Incidence of fluvial flooding (properties affected) (EA)
	Will it minimise the risk of flooding to people and property on the coast?	Incidence of coastal flooding (properties affected) (EA)
	Will it reduce the risk of coastal erosion?	Developments refused because of risk of coastal erosion (SSAG)
	Will it reduce the risk of damage to people and property from storm events?	Incidence of flood watches and warnings (EA)
To conserve and enhance biodiversity and geodiversity	Will it maintain and enhance sites designated for their nature conservation and/or geological interest?	Change in number and area of designated ecological sites (SSAG)

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Headline Objective	Sub-Objective	Indicator
	Will it avoid disturbance or damage to protected species and their habitats?	Reported condition of ecological SSSIs (Natural England)
		Development proposals affecting protected species outside protected areas (SWT)
	Will it help deliver the targets and actions for habitats and species within the Suffolk Biodiversity Action Plan?	Achievement of Habitat Action Plan targets (SBRC/SBP)
		Achievement of Species Action Plan targets (SBRC/SBP)
		Development proposals affecting selected BAP habitats outside protected areas (SWT)
	Will it help to reverse the national decline in farmland birds?	Bird survey results (BTO/RSPB)
	Will it protect and enhance sites, features and areas of geological value in both urban and rural areas?	Number and area of geological SSSIs and RIGs (Natural England)
		Reported condition of geological SSSIs and RIGs (Natural England)
To conserve and where appropriate enhance areas of historical and archaeological importance	Will it protect and enhance sites, features and areas of historical and cultural value in both urban and rural areas?	Area of historic parks and gardens (SSAG)
		Number and area of Conservation Areas and Article 4 directions (SSAG)
		Number of Conservation Area Appraisals completed and enhancement schemes implemented (SSAG)
		Number of listed buildings and buildings at risk (SSAG)
To conserve and where appropriate enhance areas of historical and archaeological importance	Will it protect and enhance sites, features and areas of archaeological value in both urban and rural areas?	Number of Scheduled Ancient Monuments (SAMs) damaged as a result of development (SSAG)
		Planning permissions affecting known or potential archaeological sites (SSAG)
To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Will it reduce the amount of derelict, degraded and underused land?	Number and percentage of new dwellings completed on previously developed land (SSAG)
		Number and percentage of existing housing commitments on previously developed land (SSAG)
		Number of vacant dwellings
	Will it improve the landscape and/or townscape?	Changes in the landscape (WI landscape survey) (SSAG)
		Number / area of town / village greens and commons
		Area of designated landscapes - AONB, Environmentally Sensitive Areas
		Number of Environmentally Sensitive Area / Countryside Stewardship / Environmental Stewardship schemes (DEFRA)
		Light pollution CPRE
		Number of planning applications refused for reasons due to poor design

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Headline Objective	Sub-Objective	Indicator
Economic Objectives		
To achieve sustainable levels of prosperity and economic growth throughout the plan area	Will it improve business development and enhance competitiveness?	Take-up of employment floorspace (SSAG)
		Employment permissions and allocations (SSAG)
		Net percentage change in the total number of VAT registered businesses in the area (SDA / Suffolk Observatory)
		Change in number of businesses paying business rates (NNDR)
	Will it improve the resilience of business and the economy?	Business formation rate (Or new VAT registrations as a % of total VAT registered stock) (SDA/Suffolk Observatory)
		Number and percentage of employees by employment division (SSAG)
		Business start ups and closures (Suffolk Observatory)
		Number and percentage of businesses by main industry type (AMR)
	Will it promote growth in key sectors?	Number an percentage of businesses by size (number of employees) (AMR)
	Will it improve economic performance in advantaged and disadvantaged areas?	Number and percentage of businesses by industry type in key sectors (local authority to specify key sectors) (SSAG / AMR)
		Comparative industrial and office rental costs within the plan area (CLG/Estate Agents)
	Will it encourage rural diversification?	Employment permissions and allocations in rural areas (SSAG)
Planning consents for B1, B2 and B8 in rural areas (part of employment land availability for regional level). Could be expanded to include additional uses such as retail (LAs)		
To revitalise town centres	Will it increase the range of employment opportunities, shops and services available in town centres?	Proportion of town centre units with A1 uses (SSAG)
To revitalise town centres	Will it decrease the number of vacant units in town centres?	Vacant units in town centres (SSAG)
To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	Distances travelled to work for the resident population (Census). Can also look at import/export of workers in plan area.(Some SCC data)
		Employment permissions and allocations in urban areas (SSAG)
		Number / percentage of people working from home (Census provides a baseline, and planning consents for working from home indicate trends - this is subset of the above indicator plus rural working from home; SCC can also provide some data)
	Will it improve accessibility to work by public transport, walking and cycling?	Percentage of households with broadband and internet connection
		Number of developments where a travel plan is submitted or is a condition of development (SSAG)
		Percentage of journeys to work undertaken by sustainable modes (SSAG)

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Headline Objective	Sub-Objective	Indicator
	Will it reduce journey times between key employment areas and key transport interchanges?	May be relevant for Ipswich but not considered suitable for Suffolk as a whole.
	Will it increase the proportion of freight transported by rail or other sustainable modes?	Proportion of port freight carried by rail (Port Authorities / AMR)
	Will it increase the consumption of locally produced food and goods?	Number of farmers markets and farm shops (LAs)
To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	Number of enquiries to business advice services (business link, LAs)
	Will it encourage inward investment?	Number of enquiries to Suffolk Development Agency / LA / SCC
	Will it make land available for business development?	Employment land availability (SSAG)
		Employment permissions and allocations (SSAG)

3.2 Social Baseline Information and Analysis of Trends







Babergh had a population of 83,461 in 2001 and was estimated at 86,910 in mid 2006 (SCC estimates); with 34,862 households (2001 census). A significant percentage; 18.4% of the population is older than 65 years (19.1 % in 2004, Suffolk Observatory).

Babergh consists of an area of 59,378 hectares. The district has 76 parishes and 25 wards. Babergh District is mainly classified as countryside, and has two market towns Sudbury and Hadleigh. Of the 76 villages 15 are considered to have key services and facilities within them and are classified as sustainable villages in the Local Plan. For planning purposes part of the Ipswich Policy Area falls within the Babergh district.

Of the households in Babergh, 5,497 do not own a car (16%) but a significant proportion of households own 2 or more cars. Affordable housing, particularly for new forming households, is a major issue in the Babergh District, according to the Babergh District Housing Needs Survey, 2004 with average house and flat prices having risen by 109% and 110% respectively, since 2000. Since 2004 the price rises to 2008 have been less with an overall increase of 34.5% according to the Land Registry. In February 2007 (2008 figures in brackets) the average price of a detached house sold in the district was £318,791 (£326,928) and the price for a semi-detached house was £185,392, (208,554) for a terraced house £169,816, (£166,214) and flats/maisonettes £101,051, (£ 130,101).

There are also pockets of social deprivation in the district along with small areas where the health of the residents is notably worse than in the county or district as a whole. It is important not to overlook these areas in the evaluation process otherwise inequalities are likely to increase. A summary analysis of the social baseline information contained in the baseline report is provided in the table below.

Table 5: Social Impacts of the Baseline Indicators

Objective	Impact/Progress	Sustainability Issue
Health	 	No sustainability issues other than the number of people killed and seriously injured in road traffic accidents, which need to be reduced. Figures for Babergh however are below the average for Suffolk. There are however small areas where people have poor health, particularly in parts of Sudbury and Gt Cornard, which cause concern.
		Improved monitoring of data for change in playing space is needed.
Education		No sustainability issues. Figures for educational levels are similar or higher than the average for Suffolk.
Crime and anti-social activity	 	The crime figures for Babergh are relatively low for Suffolk. Crime rates and fear of crime have increased in the last number of years. However the vast majority of people feel safe in the area where they live.
		Noise complaints have increased in the last few years. In relation to national figures these are still relatively low rates.
Poverty		No sustainability issues presently experienced. Figures for Babergh are lower than those for Suffolk, in general however there are a few areas which cause concern.

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Objective	Impact/Progress	Sustainability Issue
Access to services	☹️ ☹️	There has been a rapid decrease in the number of people who have access to a wide range of rural services within their own village. With the area predominantly rural in nature, access to public transport and services are important issues to consider. The use of the car for the school run is increasing which is contrary to the county trend.
		Monitoring of access to key local services and food shops, new retail space and access to childcare places is improving.
Employment	😊 ☹️	Unemployment rate is low. Similar levels to average for Suffolk.
		The proportion of lone parents and long term-ill who are economically active as well as the average earnings could affect sustainability in the district
Housing	☹️ ☹️	Homelessness, housing stock, housing land availability, housing types and sizes, average property prices are all sustainability issues that have been identified (the housing needs survey indicated housing types and sizes as well as affordability were serious issues within district)
		Monitoring of special needs housing and the number of unfit homes can be improved. The definition of special needs housing needs further work.
Quality of life	☹️	No sustainability issues have been identified but monitoring of data needs to be improved. Higher percentage of residents very satisfied with their neighbourhoods as a place to live than in Suffolk as a whole.
		Monitoring of the area of land managed for ecological interest with public access needs to be improved.

KEY: 😊 = Good progress/positive trend/on target. ☹️ = Mixed progress/unable to determine trend.

☹️ = Poor progress/negative trend/below target

3.3 Environmental Baseline and Analysis of Trends

Conserving the natural and historic environment in Babergh is considered a key issue for the district with its wealth of important and varied natural habitats including grassland, woodland, rivers, estuarine mudflats, saltings, etc. Many of these habitats have their importance recognised by various national, international, county and local designations. A large part of the district is classified as countryside and is under threat from changes in farming practices, new and existing development, visitor pressure, traffic generation and a lack of appropriate management, although large areas are part of countryside management schemes.

Babergh District supports two towns and several villages recognised nationally as being of exceptional architectural, historical or environmental quality. There are 28 designated conservation areas in Babergh and nearly 4000 buildings are listed as being of Special Architectural or Historical Interest.

A summary of the analysis of the environmental baseline information contained in the baseline report is provided in the table below.

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Table 6: Environmental Impacts of the Baseline Indicators

Objective	Impact/ Progress	Sustainability Issue
Water and Air Quality	😊 😐	Generally no sustainability issues regarding air quality although monitoring of locations along A12 and Sudbury town centre does have one Air Quality Management Zone due to traffic.
		No information available on Water Quality and monitoring of these indicators has to be improved.
Soil	😊	No sustainability issues; monitoring of indicators has to be improved for rehabilitation and use of contaminated sites.
Water and mineral resources	😊 😐	No sustainability issues regarding the use of minerals.
		No information available on sustainable use of water and monitoring of these indicators has to be improved
Reduce waste	😊 😐	No sustainability issues, household and municipal waste levels are being reduced. Rates are lower than for Suffolk. Work still needs to be done in some areas of recycling.
Traffic	😞 😐	Sustainability issues – steadily rising traffic levels, amount of development taking place in major towns has decreased in some years (but this may change in the future) and there is also a decrease in rural service provision, this has led to increased car usage. The car is also heavily used for the school run counter to the Suffolk trend. Monitoring of indicators has to be improved. The situation does not compare favourably with those in the rest of Suffolk. Babergh has the second highest proportion of households with 3 or 4 cars in Suffolk in the 2001 Census.
		Monitoring of distances to key services, can be improved.
Reducing contributions to climate change	😞 😐	Sustainability issues – gas consumption increasing and few energy efficiency schemes planned.
		Monitoring of energy efficiency of homes needs to be improved.
Vulnerability to climate change	😊 😐	Monitoring has to be improved of properties at risk of flooding from rivers and the sea, incidence of fluvial flooding and coastal flooding. Although it is not believed that there are large numbers.
Biodiversity	😐 😞	In terms of area affected, the Stour and Orwell river estuaries are in a declining condition dominate the condition of ecological SSSI's. Monitoring of reported conditions of SSSIs, achievement of the Species Action Plan targets, development proposals affecting selected BAP habitats is improving but bird survey results are not detailed enough to reach a conclusion.
Historical and archeological areas	😊 😐	No sustainability issues but monitoring of data needs to be improved.
		There may need to be more appraisals of Conservation Areas.

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Objective	Impact/ Progress	Sustainability Issue
Landscapes and townscapes	☹️ 😊	The area of land designated as 'environmentally sensitive areas' has decreased, but other schemes have taken over and there has been an increase in the number of schemes overall as well as the area covered. The quality of the landscape as assessed through the landscape character assessment process has identified an improvement in the quality of the landscape features for the 2 character areas affecting Babergh.
		The number of village greens and commons, light pollution and monitoring the number of planning applications refused for reasons of poor design could to be improved but the latter is probably a poor indicator.

KEY: 😊 = Good progress/positive trend/on target. ☹️ = Mixed progress/unable to determine trend.

☹️ = Poor progress/negative trend/below target

3.4 Economic Baseline and Analysis of Trends

A total of 695 (1.4%) people resident in the district were unemployed in 2006. The Babergh District Council Employment Land Study identified that Babergh has a diverse economy with a strong manufacturing sector, a declining agricultural base, and a tourism industry with significant growth potential. The business base is characterised by a high proportion of micro-businesses (employing 0 - 4 employees) with rates of business formation, in terms of VAT registrations slightly below the County average. The stock of businesses has increased in the District since the mid-1990s, indicating to some extent that the District remains attractive as a business location. It is important that the District becomes less reliant on the existing major companies and continues to nurture SMEs in sectors of growth potential such as ICT, business services and tourism.

Babergh has had a shortage of employment land, which has pushed land prices up. There is also a shortage of commercially attractive buildings available for immediate occupation. Research showed that the overall rating of Babergh as a business location was very positive. New employment land has been allocated in Hadleigh and Sudbury as well as on the Ipswich fringe and other locations to meet the identified local need.

In the context of Suffolk, Babergh has a comparatively small amount of industrial, warehouse and office floorspace reflecting its local and sub-regional economic role. Babergh has 29% of the potential general industry floorspace, no potential office floorspace, 22% of the potential high tech floorspace, no potential starter floorspace, and 2% of the potential storage floorspace in Suffolk. There appears to have been a lack of available start-up space, expansion space and opportunities for the development of any new employment locations. The importance of the provision of rural workspace has been identified in the study and the provision of local employment opportunities has been encouraged through the provision of workspace proposals in sustainable villages within the Local Plan.

According to 2001 Census figures 2,572 of the residents that work in the district travel to work by public transport, 27,977 travel to work by car, motorcycle or van. The average distance travelled to a fixed place of work is 17.45 miles. This emphasises the need for a continued focus on sustainable development reducing the need to travel.

Table 7: Economic Impacts of the Baseline Indicators

Objective	Impact/ Progress	Sustainability Issue
Prosperity and economic growth	😊 😐	Positive trends in percentage change in the total number of registered businesses in the area, although the new business formation rates are low. Unemployment is very low in relation to national and Suffolk figures.
Revitalise town centres	😊 😞	Proportion of town centre units with A1 uses has decreased, however the vacant units in the town centres have also decreased.
Efficient movement patterns and growth	😐	The proportion of people who travel to work by sustainable modes of transport is below the county average and does not appear to be improving. To confirm this trend may not be possible until the next census. This may be due to the rural nature of the district but it has not reduced the district's attraction to investors.
		Monitoring of locally sourced products stocked by major supermarkets has to be improved.
Indigenous and inward investment	😊 😐	There is considerable interest both from within Suffolk and from outside the area, including international interest in investing in Babergh. There is currently (2006) high demand for employment floorspace within Babergh particularly from indigenous firms seeking to expand their businesses locally. The demand for leased premises is however limited.

KEY: 😊 = Good progress/positive trend/on target. 😐 = Mixed progress/unable to determine trend.

😞 = Poor progress/negative trend/below target

4 Task A3: Identifying sustainability issues and problems

4.1 Identifying Key Issues

The next stage in the sustainability appraisal process is to identify the key issues affecting the area in line with overall aims for reaching sustainable development. This has been done through consideration of the scoping exercise (A1), an analysis of baseline indicators (A2), key issues identified throughout the process and work completed by the SSAG workgroup.

4.2 Key Sustainability Issues for Babergh District

This section brings together the work identified in the sections above (baseline information and literature review) to focus on the particular issues relating to the Babergh district. The Sustainability Appraisal is structured around the three issues: social,

economic and environmental. There are many issues that cut across these, such as transport, for example, which has impacts on all three. Tables 3, 5, 6 and 7 identify the key issues for the Babergh district (as identified through a review of the information outlined above) that may be addressed through the Local Development Framework DPD's and SPD's. The social, environmental and economic problems that face Babergh District together with the sources of supporting evidence are identified in section A2. The problems have been identified through the context review (A1) and baseline review (A2).

5 Task A4: Developing the Sustainability Appraisal Framework

The Local Development Framework and the documents within it aim to fulfil those aspects of sustainable development that are considered to be of relevance to the Babergh District, with consideration for environmental, social and economic issues. Following the literature review, definition of sustainability requirements, investigation of baseline information and identification of issues that need to be assessed, it is possible to establish a framework for the assessment of Development Plan Documents (DPD's) and Supplementary Planning Documents (SPD's).

5.1 Defining Objectives

In order to assess the effects of Development Plan Documents (DPD's) and Supplementary Planning Documents (SPD's) in the context of sustainable development it is necessary to identify a comprehensive list of objectives within the Sustainability Appraisal which DPD's and SPD's should seek to attain. The objectives were formulated after consideration of the sources reviewed under the Policy Context (A1) with advice from the Government Guidance on Sustainability Appraisal, baseline indicators that were considered (A2) and work done by the SSAG workgroup as indicated in 1.3.1. Attached in Appendix 3 are the early indicators produced by the SSAG workgroup.

The objectives chosen for Babergh District are tailored to its unique set of environmental, social and economic characteristics and the issues raised through the assessment and analysis of baseline information. Each objective is chosen for its desired effect as an outcome rather than a means of reaching that outcome. For example 'to reduce the amount of traffic on the roads' would be an overall objective and one means to achieve the objective would be to 'encourage more people to use public transport'.

The objectives are set out to cover the wide range of social, economic and environmental issues of sustainability. This set of objectives will serve to identify how far the SPD is addressing issues of sustainable development by clarifying where there are any conflicts between the aims for reaching sustainability and the approach set out in the SPD.

The Framework acts as a test mechanism for assessing the compatibility of policies, Development Plan Documents and Supplementary Planning Documents with the Sustainability Appraisal objectives, not just related to land use or planning. This is illustrated in the form of a compatibility matrix developed by the SSAG workgroup (Table 8) and adapted for the Babergh District that highlights the main areas of possible conflict.

5.2 Use of indicators and targets

Using baseline information and the themes expressed as key issues allow us to identify particularly important concerns for Babergh District. We can form questions arising from these issues to test a Development Plan Document's or Supplementary Planning Document's compliance with the Sustainability Appraisal objectives, as shown in Table 9.

The main area of conflict is anticipated to be between the housing needs of the district and environmental factors such as conservation of soil resources, mineral resources, reduction of waste, reducing traffic and reducing water consumption as well as other environmental objectives. Other areas of potential conflict exist between achieving economic growth and investment and meeting environmental objectives for example the impact on the distinctive character of historic settlements, especially villages.

As explained in 1.3.1 the framework has been developed based on government guidance along with existing SSAG monitoring. The objectives have been informed through the work to identify issues and the scoping of objectives at various levels. The compatibility of the objectives has also been tested, see table 9 below. Sub questions and indicators have been developed and link to the baseline. Some targets have been identified through the work on establishing a baseline.

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Table 8: Testing the compatibility of the Sustainability Appraisal Objectives

SA Objectives 1-6	SA Objectives 1-13											
	1.To improve the health of the population overall	2.To maintain and improve levels of education and skills in the population overall	3.To reduce crime and anti-social activity	4.To reduce poverty and social exclusion	5.To improve access to key services for all sectors of the population	6.To offer everybody the opportunity for rewarding and satisfying employment	7.To meet the housing requirements of the whole community	8.To improve the quality of where people live and to encourage a sense of community identity and welfare	9 & 10.To improve water and air quality	11.To conserve soil resources and quality	12.(part) To conserve mineral resources	13. To reduce waste
1. To improve the health of the population overall		✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	♦ Neutral	✓ Positive compatible
2. To maintain and improve levels of education and skills in the population overall			✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	♦ Neutral	✓ Positive compatible	✓ Positive compatible? Ed leads to increased awareness hence care of water and air pollution?	♦ Neutral	♦ Neutral	✓ Positive compatible
3.To reduce crime and anti-social activity				✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	♦ Neutral	♦ Neutral	♦ Neutral	♦ Neutral
4.To reduce poverty and social exclusion					✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	♦ Neutral	♦ Neutral	✓ Positive compatible
5.To improve access to key services for all sectors of the population						✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	♦ Neutral	♦ Neutral or positive compatible, in that if dev spreads onto Greenfield sites services may become more remote?	♦ Neutral	♦ Neutral
6.To offer everybody the opportunity for rewarding and satisfying employment							✓ Positive compatible	✓ Positive compatible?	♦ Neutral	♦ Neutral	♦ Neutral	♦ Neutral

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Objectives 7 -11	SA Objectives 1-13											
	1.To improve the health of the population overall	2.To maintain and improve levels of education and skills in the population overall	3.To reduce crime and anti-social activity	4.To reduce poverty and social exclusion	5.To improve access to key services for all sectors of the population	6.To offer everybody the opportunity for rewarding and satisfying employment	7.To meet the housing requirements of the whole community	8.To improve the quality of where people live and to encourage a sense of community identity and welfare	9 & 10. To improve water and air quality	11. To conserve soil resources and quality	12. (part) To conserve mineral resources	13.To reduce waste
7.To meet the housing requirements of the whole community								✓ Positive compatible	♦ Neutral	✗ Possible conflict (may need Greenfield sites and high quality land, partic for rural exceptions sites?)	✗ Possible conflict (More building, more materials – mitigate through encouraging reuse of materials etc?)	✗ Possible conflict (more people, more waste – mitigate through education)
8.To improve the quality of where people live and to encourage a sense of community identity and welfare									✓ Positive compatible	♦ Neutral	♦ Neutral	✓ Positive compatible?
9 & 10 To improve water and air quality										✓ Positive compatible	♦ Neutral	✓ Positive compatible?
11. To conserve soil resources and quality											✓ Positive compatible	✓ Positive compatible
12. (part) To conserve mineral resources												✓ Positive compatible

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SA Objectives 1-23	SA Objectives 12-23										
	12. (part) To reduce water consumption	14. To reduce the effects of traffic on the environment	15. To reduce contributions to climate change	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	22. To encourage efficient patterns of movement in support of economic growth	23. To encourage and accommodate both indigenous and inward investment
1. To improve the health of the population overall	• Neutral?	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	• Neutral	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible
2. To maintain and improve levels of education and skills in the population overall	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	• Neutral?	• Neutral	✓ Positive compatible
3. To reduce crime and anti-social activity	• Neutral	• Neutral	• Neutral	• Neutral	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	• Neutral	✓ Positive compatible
4. To reduce poverty and social exclusion	• Neutral?	✓ Positive compatible	• Neutral	• Neutral?	✓ Positive compatible?	• Neutral	• Neutral?	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible?	✓ Positive compatible
5. To improve access to key services for all sectors of the population	• Neutral	✓ Positive compatible	✓ Positive compatible	• Neutral	• Neutral	• Neutral	• Neutral	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible?	✓ Positive compatible?
6. To offer everybody the opportunity for rewarding and satisfying employment	• Neutral	• Neutral	• Neutral	• Neutral	• Neutral	• Neutral	• Neutral	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible?	✓ Positive compatible
7. To meet the housing requirements of the whole community	✗ Possible conflict (more homes more water use – mitigate through education, recycling measures etc?)	✗ Possible conflict More homes, more cars? – mitigate through location of housing and services together and creation of walking environment, improved public transport etc?)	✗ Possible conflict More homes more use of energy – mitigate through energy efficiency/renewables?	✗ Possible conflict Potentially pressure to develop areas at risk of flooding if lack of sites. Possible mitigation needed.	✗ Possible conflict Could be pressure to develop brownfield or Greenfield sites with biodiversity.	✗ Possible conflict More housing increases pressure on archaeology in particular.	✗ Possible conflict Possible conflict where development encroaches into the landscape.	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible?	✓ Positive compatible?
8. To improve the quality of where people live and to encourage a sense of community identity and welfare	• Neutral	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible?

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SA Objectives 1-23	SA Objectives 12-23										
	12. (part) To reduce water consumption	14. To reduce the effects of traffic on the environment	15. To reduce contributions to climate change	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	22. To encourage efficient patterns of movement in support of economic growth	23. To encourage and accommodate both indigenous and inward investment
9 & 10 To improve water and air quality	✓ Positive compatible? (less water requires less treatment?)	✓ Positive compatible	✓ Positive compatible	• Neutral	✓ Positive compatible	• Neutral	✓ Positive compatible?	✗ Possible conflict Economic growth could increase pollution?	✓ Positive compatible	✓ Positive compatible	✗ Possible conflict Economic growth could increase pollution?
11. To conserve soil resources and quality	• Neutral	✓ Positive compatible (limit land lost through road building)	✓ Positive compatible? Protecting Greenfield sites against development reduces urban sprawl and hence increase of emission from greater car use?	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✗ Possible conflict Economic growth could lead to loss of Greenfield land.	✓ Positive compatible	✓ Positive compatible	✗ Possible conflict Economic growth could lead to loss of Greenfield land.
12. (part) To conserve mineral resources	✓ Positive compatible? Conserve minerals so fewer buildings built which would in turn lead to increased water consumption?	✓ Positive compatible? Conserve minerals so fewer buildings built which would in turn lead to increased traffic and impact on environment?	✓ Positive compatible?	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✗ Possible conflict Economic growth could lead to increased use of materials for building.	✓ Positive compatible	✓ Positive compatible More efficient patterns lead to reduced need for minerals for road building etc.	✗ Possible conflict Economic growth could lead to increased use of materials for building.
13. To reduce waste	• Neutral	Neutral or positive compatible? Less waste less need to transport it and hence less traffic?	✓ Positive compatible? Less waste less energy needed to produce it, less need to transport it and hence less emissions?	• Neutral	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✗ Possible conflict Could increase waste.	• Neutral	• Neutral	✗ Possible conflict Could increase waste.
12. (part) To reduce water consumption		• Neutral	• Neutral	✓ Positive compatible? (reduce impact of droughts)	✓ Positive compatible	• Neutral	• Neutral	✗ Possible conflict More industry more water use	• Neutral	• Neutral	✗ Possible conflict More industry more water use

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SA Objectives 1-23	SA Objectives 12-23										
	12. (part) To reduce water consumption	14. To reduce the effects of traffic on the environment	15. To reduce contributions to climate change	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	22. To encourage efficient patterns of movement in support of economic growth	23. To encourage and accommodate both indigenous and inward investment
14. To reduce the effects of traffic on the environment			✓ Positive compatible	• Neutral	✓ Positive compatible	✓ Positive compatible	✓ Positive compatible	✗ Possible conflict More industry more traffic	✓ Positive compatible	✓ Positive compatible	✗ Possible conflict More industry more traffic
15. To reduce contributions to climate change				✓ Positive compatible	✓ Positive compatible	✗ Possible conflict Historic buildings often not energy efficient?	• Neutral	✗ Possible conflict More industry more energy use	• Neutral?	✓ Positive compatible	✗ Possible conflict More industry more energy use
16. To reduce vulnerability to climatic events					✗ Possible conflict Flood defence schemes can harm habitats	✓ Positive compatible	✓ Positive compatible	✗ Possible conflict Could be pressure to build on land at risk of flooding.	✓ Positive compatible	• Neutral?	✗ Possible conflict Could be pressure to build on land at risk of flooding.
17. To conserve and enhance biodiversity and geodiversity						✓ Positive compatible?	✓ Positive compatible	✗ Possible conflict May put pressure on sensitive sites	• Neutral?	✓ Positive compatible	✗ Possible conflict May put pressure on sensitive sites
18. To conserve and where appropriate enhance areas of historical and archaeological importance							✓ Positive compatible	✗ Possible conflict May put pressure on sensitive sites	✓ Positive compatible	✓ Positive compatible	✗ Possible conflict May put pressure on sensitive sites
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes								✗ Possible conflict May put pressure on sensitive sites	✓ Positive compatible	✓ Positive compatible	✗ Possible conflict May put pressure on sensitive sites
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area									✓ Positive compatible	✓ Positive compatible	✓ Positive compatible

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SA Objectives 1-23	SA Objectives 12-23										
	12. (part) To reduce water consumption	14. To reduce the effects of traffic on the environment	15. To reduce contributions to climate change	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	22. To encourage efficient patterns of movement in support of economic growth	23. To encourage and accommodate both indigenous and inward investment
21. To revitalise town centres										✓ Positive compatible	✓ Positive compatible
22. To encourage efficient patterns of movement in support of economic growth											Positive compatible or possible conflict in that more industry increase traffic movements

- ✓ Positive compatible
- ◆ Neutral
- ✗ Possible conflict

Note: For revised objectives 9 and 10 they have been left as one in the compatibility matrix as it is considered unlikely that the comments will alter, however representations on this approach are welcome as part of this consultation.

5.3 Using the Framework to assess the likely significant effects of Development Plan Documents and Supplementary Planning Documents

Having identified Sustainability Appraisal objectives against which an appraisal will assess Development Plan Documents and Supplementary Planning Documents, it is necessary to identify test indicators to measure how closely the Development Plan Documents and Supplementary Planning Documents are achieving their wider aims. These criteria are then used to identify any potential impacts of reviewed Development Plan Documents and Supplementary Planning Documents and their effects once they are implemented.

The SA objectives and associated indicators have been developed by the SSAG workgroup with input from key stakeholders following wider comment and discussion. The Indicators are chosen, in line with the former ODPM guidelines, to be monitored regularly and used to assess the effects of Development Plan Documents and Supplementary Planning Documents. Consideration is also given to finding indicators that allow comparison between local data and the wider picture (a 'comparator' value).

The information and data used for the framework can be reviewed on a regular basis, if the sources allow, and objectives and indicators revised accordingly. Implementation of the LDDs could therefore be part of annual monitoring reports.

Table 4 identifies the indicators used to measure the sustainability appraisal objectives. The baseline information for these indicators and their sources are provided in the baseline document, which also provides some trend information that should be taken into account. This table will form a provisional basis for monitoring on an annual basis as part of the new LDF system. Where information is not available, note is made for possible future data collection.

Whilst the nature of using indicators is selective in the information they provide, an assessment of additional factors and the scale of their impact deemed necessary for consideration can be made when testing the Development Plan Documents and Supplementary Planning Document against the SA Framework, as seen in Table 9.

The template Sustainability Appraisal Framework, which marks the culmination of this report and is used to appraise emerging Development Plan Documents and Supplementary Planning Documents as part of the Local Development Framework, can be viewed in Table 9.

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*Table 9: Draft Table of the Sustainability Appraisal of a Policy or Proposal.
(For a description of the Sustainability objectives and sub objectives refer to Table 4 on page 23)*

DPD or SPD Chapter or Heading											
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects							Justification for assessment noting: <ul style="list-style-type: none"> • Likelihood/certainty of effect occurring (high/med/low) • Geographical scale of effect • Whether temporary or permanent • Assumptions made Include recommendations for mitigation/improvement	
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy		Rating
Social Indicators											
Health	Health facilities										
	Death rates										
	Healthy lifestyles										
Education	Improve Qualifications										
Crime and anti-social activities	Will reduce crime										
	Reduce fear of crime										
	Reduce noise and odours										
Poverty and social exclusion	Reduce poverty										
Access key services	Access key local services										
	Accessibility of shopping facilities										
	Access child care										
Employment	Unemployment										
	Job opportunities										
	Improve earnings										
Housing	Reduce homelessness										
	Provide enough housing										

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	Increase range and affordability												
	Reduce no of unfit homes												
Community participation	Satisfaction of neighbourhood												
	Increase green space												
	Engagement in decision making												
	Involvement in volunteer activities												
	Improve ethnic relations												
	Improve access to cultural facilities												
Summary of appraisal against social objectives (for example													
Environmental Indicators													
Water and air quality	Quality of water												
	Quality of air												
To conserve soil resources and quality	Minimise loss of Greenfield land												
	Loss agricultural land												
	Soil quality												
Use of water and mineral resources	Sustainable use of minerals												
	Sustainable use of water												
Reduce waste	Reduce household waste												
	Increase recycling												
Reduce effects of traffic	Effect traffic volumes												
	Reduce need for local travel												
	Increase car journeys												
Reduce contributions to climate change	Reducing energy consumption?												
	Increase proportion of energy needs met by renewable sources?												

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Vulnerability to climatic events	Minimise risk of flooding											
	Risk damage from storms											
Conserve and enhance biodiversity and geodiversity	Protect designated sites Does the policy or proposal have a significant impact on European designated sites, when considered on its own or with other plans or proposals?											
	Deliver targets of Suffolk Biodiversity Action Plan											
	Reverse decline in farmland birds											
	Protect designated geological sites											
Historical and archaeological importance	Protect designated historical sites											
	Protect designated archaeological sites											
Landscapes and townscapes	Reduce underused land											
	Improve landscape/townscape, impact on protected sites AONB's											
Summary of appraisal against environmental objectives (for example)												
Economic Indicators												
Economic growth	Improve business development											
	Promote growth in key sectors											
	Economic performance											
	Rural diversification											
To revitalise town centres	increase range of employment opportunities											
	Decrease vacant units in town centres?											

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To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting											
To encourage efficient patterns of movement in support of economic growth	Improve accessibility to work											
	Reduce journey times between employment areas											
	Increase freight transported											
	Increase consumption of local goods											
Increase investment	Encourage indigenous business											
	Encourage inward investment											
	Make land available for business development											
Summary appraisal against economic objectives (for example)												
<p>Conclusions:</p> <p>Recommendations:</p>												
Key to Appraisal of Effects												
<p>Will the policy make a positive or negative contribution to the appraisal objective?</p> <p> ++ Major positive + Minor positive - Minor negative -- Major negative 0 Neutral effect ? Uncertain effect </p>												

6 Task A5: Consulting on the Scope of the Sustainability Appraisal

To meet the requirements of the Strategic Environmental Assessment (SEA) Directive, the District Council must seek the views of four environmental consultation bodies set out in the SEA Regulations. These are the Countryside Agency (now part of Natural England), English Heritage, Natural England and the Environment Agency they must be consulted on the scope and level of detail of the environmental information to be included in the Sustainability Appraisal (SA) Report. It is desirable to consult other bodies as well and the Council is recommended to allow 5 weeks for the process. This has already taken place but this document seeks to consolidate the results of past consultations.

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APPENDIX 1: LIST OF DOCUMENTS PRODUCED BY SSAG FOR USE OF SUFFOLK AUTHORITIES IN PRODUCING THEIR SCOPING REPORTS FOR THE SUSTAINABILITY APPRAISAL OF LDF'S

Document	Purpose	Status	Date signed off by SSAG and circulated to Suffolk LA's	Comments
Consultation document for draft SA framework	Prepared for informal consultation	Complete		
Consultation responses following informal consultation and subsequent changes to the SA framework	To demonstrate early consultation and expert input in developing the SA framework.	Complete		
Context Review of other plans, programmes and objectives (scoping of documents)	To inform the development and content of DPDs and the SA framework.	Still two or three documents to be scoped otherwise complete		Two documents: 1. Scoping of documents 2. List of documents scoped
Baseline data schedule	To provide a baseline of information and trends where appropriate to assist in characterising the DPD area and for monitoring of potential significant effects.	Complete List of indicators to be developed further by SSAG to be compiled		Existing targets included as appropriate. Some gaps will need to be filled by individual Council's. Regional and national comparators not always included.
Sustainability Framework comprising Objectives, Sub Objectives and Indicators	To provide a framework for the appraisal of policies and proposals.	Complete		
Defining objectives schedule	Early consideration of key objectives to be included.	Complete		

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Document	Purpose	Status	Date signed off by SSAG and circulated to Suffolk LA's	Comments
Testing the compatibility of SA objectives	To identify where there is 'possible conflict' between objectives so they can be revised where appropriate or the need to mitigate can be highlighted.	Complete		There are two documents: 1. a large spreadsheet that includes SSAG's reasoning 2. an A4 summary.
Suggested common format for Scoping Reports	As an aid to coming to a view on the most appropriate format. To assist in providing some level of consistency across Suffolk.	Complete		
Documentation of effects	This template was derived from the draft SA guidance to provide an example of how the SA framework could be used to document the appraising of a plan policy.	SSAG discussed and amendments to be made to layout and summary template to be produced.		There are two documents: 1. documentation of effects template 2. documentation of effects summary template (the public version)

DR 23/05/05

APPENDIX 2: RESPONSES FROM EARLY CONSULTATIONS REGARDING COMMON FRAMEWORK FOR SEA FOR SUFFOLK

SSAG SUSTAINABILITY APPRAISAL – INFORMAL CONSULTATION

Responses received from:

1. **Dr Richard Rafe, Area Manager, English Nature**
2. **Dr Simone Bullion, Conservation Officer, Suffolk Wildlife Trust**
3. **David Palk, Development Manager, Suffolk County Council**
4. **Tony Rudd, Economic Development, Waveney District Council**
5. **Alan Wheeler, Regional Planning Consultant, EERA**
6. **Andrew Hunter, Development Planning Officer, Environment Agency**
7. **Sarah Jennings, Countryside Strategy Officer, Suffolk County Council**

View from Dr Richard Rafe, Area Manager, English Nature in Suffolk

I am aware of the work under the project banner of ‘Suffolk’s Environment – towards sustainable development’. For me, it has been there in the background but we have never really engaged, and I think it has therefore not reached the potential audience or application that it possibly deserves. Nonetheless I am aware that Suffolk Wildlife Trust has had input to this work, and I hope that the Suffolk Environment monitoring has been useful to the local authorities who instigated the work.

I am disappointed that from my perspective this consultation has come ‘out of the blue’ with a very short deadline. The application of Sustainability Appraisal (SA) is potentially a very powerful tool and I am pleased to see SCC and SSAG taking a proactive approach to setting SA objectives which can then form a consistent basis for SA of the individual Local Development Plans.

I would be interested to know who makes up SSAG and to whom it is responsible. I presume it has an inward local authority focus. The Introduction to the present consultation is somewhat brief in providing this type of information.

I infer that the draft Sustainability Appraisal Framework is aimed at the forthcoming production of Development Plan Documents within Suffolk, but it could presumably have a much wider application and be applied in other instances where SA is required or appropriate. The objectives within the SA framework cover a broad range of social, environmental and economic issues, not just those relating to land use and planning.

The process for the identification of sustainability objectives appears to have been thorough and rigorous. I support the draft headline objectives as set out although at this headline level the objectives are very broad and not specific enough to be measurable – the use of the sub-objectives and indicators is therefore crucial to make the framework functional.

The environmental headline objectives include the key aspects of importance to ensure the maintenance and enhancement of biodiversity both as a direct objective, and supported by conserving and improving soil, water and air quality, reductions in the contribution and vulnerability to climate change, and conserving and enhancing the quality and local distinctiveness of landscapes.

Document (c) tests the compatibility of the SA objectives with each other. Not surprisingly there are some potential conflicts. Although both this document and other generic guidance on this approach indicate that, where appropriate, conflicting objectives can be modified to make them compatible, the ‘final’ objectives as presented here retain some tensions and I see little possibility of these being resolved completely at this strategic level. This should not just be left ‘up in the air’. There needs to be some guidance on how to deal with such conflicts – is one objective more important than another?

SSAG 1. There will always be conflict between different aspects of sustainable growth (e.g. economic growth v environmental protection) but the aim is that the framework can be used to develop and favour options which minimise conflicts and impacts.

Considering Document (d) setting out the proposed objectives, sub-objectives and indicators, I shall only comment on the environmental objectives, other than to suggest the possible use of ANGSt (Accessible Natural Greenspace Standards – English Nature) as an indicator in the healthy lifestyles sub-objective.

SSAG 2. Following additional discussion with Sarah Jennings, Countryside Strategy Officer at SCC, it seems likely that this will be developed into a suitable indicator for the future, and will be included in the framework.

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Objective: to conserve soil resources and quality.

The sub-objectives are focussed on retaining Greenfield and BMV agricultural land. I would support the inclusion of something additional about good soil management, i.e. prevention of erosion or run-off, but I have no expertise in relevant indicators for such a sub-objective.

SSAG 3. Suitable indicators to cover soil management are being investigated by the group. Andrew Hunter (Environment Agency) has agreed to look into potential indicators relating to farm management plans, or possible DEFRA standards.

Objective: to reduce the vulnerability to climatic events.

I am pleased to see that both reducing the contribution to climate change and vulnerability to climatic events are included. I have some concerns about the wording or focus of these sub-objectives – “minimise or reduce the risk” of flooding etc could be taken to imply an emphasis on engineering solutions to ameliorate problems, whereas I would be seeking more of a strategic planning emphasis to prevent future problems arising, so explicit wording to minimise future risk and to reduce existing risk.

SSAG 4. Following discussion within the group and with Andrew Hunter of the Environment Agency (who supply flooding data), it was not considered necessary to amend the existing wording.

Objective: to conserve and enhance biodiversity.

The sub-objective concerning designated sites needs to be specific about which designations are included: SSSIs, SPAs, SACs, Ramsar sites, NNRs, LNRs, CWSs (lots of designations and lots of acronyms).

The two sub-objectives seeking to conserve and enhance habitats and species should be replaced with suggested alternatives below. The phrase ‘protected habitats’ is not defined, and protected species should be separated out from BAP species.

Suggested sub-objective: will it avoid disturbance or damage to protected species and their habitats. The indicator for this could be number of development proposals affecting protected species, with information available from SWT. My rationale for suggesting this is that some species receive specific protection under the Wildlife & Countryside Act (e.g. bats, great crested newts).

SSAG 5. This objective will be incorporated into the framework. The suggested indicator is already used by SSAG as "Protection of Suffolk's biodiversity measured through sampling" and this will be used here.

Suggested sub-objective: will it help deliver the targets and actions for habitats and species within the Suffolk Biodiversity Action Plan (BAP). The monitoring of this could be ‘state of nature’ reports and BAP achievement reports through Suffolk Biological Records Centre / Suffolk Biodiversity Partnership.

SSAG 6. This objective and indicator will be incorporated into the framework.

Suggested sub-objective: will it help deliver the PSA target to reverse the decline in farmland birds. The indicator for this could be the BTO & RSPB monitoring applied at a county level. The draft already has farmland birds as an indicator, but I think because it is in itself a PSA target, this warrants being a sub-objective in its own right.

SSAG 7. SSAG has already investigated the farmland bird indicator, and although national data is available, reliable data for the county cannot be sourced. The BTO Breeding Birds Survey is a potential source of some data, but the sample size within Suffolk is too small to

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be statistically robust or a useful indicator of trends. However, this will be incorporated if possible, if these difficulties can be overcome.

Objective: conserve and enhance areas of historic and archaeological importance – yes it is possible to supply statistics (number, area, condition etc) for geological SSSIs in Suffolk through English Nature.

SSAG 8. The framework will be amended to reflect this.

Richard Rafe
6 January 2004

Further E-mail on 18/01/2005

Dear Sara

Just a quick further thought on sub-objectives / indicators for the sustainability framework stemming from discussions I had yesterday with Leena Ghoshal from the Suffolk Strategic Partnership which has put together the Suffolk Community Strategy.

The Suffolk Community Strategy contains a target to increase access to natural green spaces, and such an indicator would transfer across well into the sustainability framework. It could sit under the environmental objective "to conserve and enhance the quality and local distinctiveness of landscapes and townscapes", and replace, expand upon the indicator of "number / area of town / village greens and commons". Or it could be included under the social objective "to improve health", sub-objective "will it encourage healthy lifestyles".

I suggest if you think this is worth pursuing you speak to Leena.
I am keen to get as much cross-over between indicators as possible, so that the same indicators are used across a range of strategies. The SSAG draft sustainability appraisal (with the caveats in my previous comments) has a good set of biodiversity indicators - The inclusion of a green spaces indicator would complete the set.

SSAG 9. Following this consultation and discussion with Sarah Jennings, Countryside Strategy Officer at SCC, we intend to utilise the green space indicator in the Community Strategy once data is available, and it will be included in framework for the future.

Yours
Richard

Dr Richard Rafe
Area Manager, English Nature, Suffolk

View from Dr Simone Bullion, Conservation Officer, Suffolk Wildlife Trust

Thank you for consulting us on this matter. The short deadline has posed a few problems, but I am able to make the following comments:

I was sent a copy of the comments provided by Richard Rafe of English Nature and we endorse all the comments he has made. I am pleased to hear from Marie Edwards (MSDC) that this process will run in parallel with 'Suffolk's Environment' as the latter project has produced some very useful data in the past and it is important that the monitoring effort continues. As some of the indicators will be similar I would hope this wouldn't create too many difficulties.

We are pleased that the draft headline objective 'to conserve and enhance biodiversity' has been included and this is in line with Government Guidance. However I think the sub objectives might need some modification to make the indicators more specific and measurable.

In the first sub- objective - We agree with Richard that 'designated sites' needs to be more specific, but it is important to include non-statutory designated sites such as County Wildlife Sites as well as statutorily protected sites such as SSSIs, SPAs, SACs etc. We are able to provide data where planning related activities have affected County Wildlife Sites and Suffolk Biological Records Centre can provide data on changes in numbers and areas of designated sites.

SSAG 1. These are all covered by existing indicators for Suffolk's Environment, which are already incorporated into the framework.

With regard to the second and third sub objectives regarding 'conserve and enhance semi-natural habitats and avoid harm to protected habitats' and 'will it conserve and enhance species diversity and in particular avoid harm to protected species' what Richard is suggesting makes a lot of sense.

We therefore agree that it would be best to have a sub objective relating specifically to the Suffolk BAP habitats and species and a second sub objective relating to protected species and their habitats. Much BAP habitat lies within designated sites, but a certain amount does not. In addition many protected species (and BAP species with and without protection) live outside of designated sites, so this should cover all aspects.

SSAG 2. This suggestion will be incorporated into the framework.

We are able to provide information on the number of development proposals affecting protected species as we are routinely recording this. As well as scoring 'protected species' as a general category, we also separate out bats, great crested newts and reptiles, badgers, but we have the facility to add new categories as required. We also record where semi-natural (BAP) habitat is affected by development proposals outside of designated sites.

SSAG 3. A new indicator will be incorporated into the framework to reflect this.

The section on Testing the Compatibility of the Sustainability Appraisal Objectives is particularly useful. I do have concerns where particular objectives seem to generate a lot of adverse scores against other objectives. The ones which stand out are objectives 20 and 23 relating to economic growth and investment. The critical element seems to be what is 'sustainable'. I am sure that even if a development were to bring about prosperity and economic growth, yet damaged the environment, it cannot be considered as truly sustainable. I therefore think that where there are tensions the compatibility assessment should provide clarification to assist with subsequent decisions and mitigation/compensation.

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Are you intending to give equal weight to all objectives?

SSAG 4. There will always be conflict between different aspects of sustainable growth (e.g. economic growth v environmental protection) but the aim is that the framework can be used to develop and favour options which minimise conflicts and impacts.

I hope these comments help

Simone Bullion
Conservation Officer

View from David Palk, Development Manager, Suffolk County Council

Sara, thanks for letting us see this. I have read it through (but do not profess to have gone through it with a fine toothcomb!). My general comments are that it looks a) very comprehensive b) explains what it is trying to achieve very clearly and has a good stab at the objectives and indicators.

My detailed comments are from a minerals & waste perspective. I have struggled throughout the discussions on SA and SEA and in reading the ODPM's documentation to really get a grip of how M&W matters should be dealt with in terms of SA/SEA. The principles are clear (I think!) but the practical aspects are more murky. Let me elaborate;

I read the "defining Core SA objectives" (Document b) and found it hard to see how many of these related to M&W plans at all. Very few of the Social or Economic objectives seemed relevant (and I am wary of trying to shoehorn things in to these when they do not really fit well. The Environmental objectives are of course much more relevant (but not all) and in some cases the wording is difficult for us. For example we talk about reducing pollution and improving water quality. I am not sure M&W would do this. We certainly would seek to ensure that there was no detriment to water quality? The same for air quality which talks about ensuring that the quality of air is as high as practicable. We would certainly again seek to ensure no detriment but not sure that we would be able to improve it.

SSAG 1. Wording of objectives will be amended to "maintain and where possible improve water quality"

I understand that this is a county level strategic and comprehensive framework and that each District (and the County in its M&W plans) will need to adapt the framework to suit and perhaps this will a) make it easier for me to get my head around the procedures and b) to make more sense of the actual SA objectives to which we will be working.

In the "Draft Sustainability Appraisal Framework" the concerns are magnified. I couldn't see any of the social indicators being relevant to M&W. The environmental ones are again more relevant although I am not sure about the directness of the links between M&W developments and some of the indicators. The economic indicators also do not seem to be very relevant. In the environmental I have a number of detailed comments. These are

1) Under "to conserve mineral resources" you link this to the landbank. The landbank is however a "reserve" issue not a resource issue. Changes in the landbank do not reflect the conservation of resources. I am not sure what the chalk landbank indicator tells us (other than whether the MPA is approving sufficient planning permissions to maintain the landbank).

SSAG 2. SSAG will continue to investigate whether more suitable indicators are available, and replace the existing ones if possible.

2) On sterilisation of resources I think we need to link this up with potential policies in our Core strategy DPD. Whilst we currently have such zones I am not sure how robust or sensible they are nor whether we really monitor the effectiveness of our policy. Viv will have a better handle on this. I think we might wish to do some work on the need for and extent of any consultation zones, clearly express why they are defined and what the implications are for future development proposals.

SSAG 3. SSAG will continue to investigate whether more suitable indicators are available, and replace the existing ones if possible.

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3) Why do you only refer to household waste in the "to reduce waste" category? Surely this should relate to all wastes?

SSAG 4. This reflects the bias of the BVPIs on which these indicators are currently based. There are proposals to change the PSA targets to include all municipal waste, and the indicators in the framework will be updated to include this. The main barrier to including industrial waste etc is the availability of data in these sectors, but this will be addressed if possible.

4) Some of the indicators are not "outcome" oriented but method/means. For example the number of Con Area Appraisals is not a quality indicator but merely numerical I would have thought.

SSAG 5. This is an important point since method/means indicators should be avoided where possible. The indicators will be reviewed again with this in mind, and changed to be more outcome oriented where possible (where suitable data exists).

Hope these comments are helpful.

View from Tony Rudd, Economic Development, Waveney District Council

Desi, have had a quick look through the hard copy you gave me previously. There are a few notes which I cannot recall from my previous comments/analysis, so offer the following additional:

Resilience of business/economy - a time series analysis of division/type/size would record what is happening, but not sure how it would relate to resilience - what is the ideal we are aiming for? constantly changing?

SSAG 1. Resilience is indicated by the diversity of divisions/types/sizes. For example not relying too heavily on one large employer or employment sector, and being able to adapt to change.

Office/commercial rents - does a study need to be organised as an initial baseline? rates can be very localised.

SSAG 2. This data could be sourced by contacting local estate agents.

Working from home - planning consent analysis include live/work units? not all people working from home need pp?

SSAG 3. The Census samples the whole population and will be the main source of baseline data. Although not comprehensive, planning consents will give an additional indication of trends in between Censuses.

Local products at supermarkets - suggest number of products as percentage of total or value? (As overall number of lines increase this could reduce local proportion). Could a reporting mechanism be included as a condition of future planning permissions (if any - Asda)? This approach could be used for other pp e.g. monitoring use of commercial space?

SSAG 4. Sources of baseline data are currently being investigated by SSAG, initially through making contact with supermarkets directly, to establish if this indicator is viable.

Inward investment - 'enquiries' need definition.

At a quick glance, there is no specific quality of life indicators, or suggestion as to how others (e.g. health, income) might be combined into such a measure?

I know I have discussed previously but still some concerns as to which projects, policies etc. could be subject to appraisal (and therefore how appraisal will be resourced).

Hope this helps

View from Alan Wheeler, Regional Planning Consultant, EERA

Sara,

Thank you for consulting us on this initiative: I am pleased to offer a few thoughts on behalf of the East of England Regional Assembly.

First of all, I must say how much we welcome the work that has been done. A cooperative approach to sustainability appraisal such as you are developing has to make sense in avoiding much potential duplication of work, especially in assembling the context and baseline information. It is an approach which we would hope to see followed across the region.

So far as the material itself is concerned, you might like to consider the following:

Document A - defining objectives.

We are pleased that the Regional Sustainable Development Framework has been used as a source. The assembly has worked with EEDA and the Sustainable Development Round Table to develop a Sustainability Appraisal Toolkit around the high level objectives and the sustainability challenges set out in the RSDF. The Toolkit provides a set of objectives and assessment criteria and is designed to be an appraisal tool for strategies plans and projects at regional, sub-regional and local levels, including LDDs and Community Strategies. It provided the basic framework for the appraisal of the RSS and of the RES Review and is now being used in many other contexts across the region. The Toolkit also provides links to information sources for a wide range of topics. It can be found at www.toolkit-east.org.uk and you may find a useful source.

We also welcome the reference to the RSS appraisal Scoping Report. It would be as well to make reference from hereon to the submitted Sustainability Report, as this contains improves analysis of baseline information and of related plans, programmes and environmental objectives. As well as the 10 SA objectives, the Scoping Report sets out (Table 6.1) a set of SEA environmental objectives which are incorporated in the final framework, translated into assessment questions. These, again, might be cited. The RSS SA of course sets out (Table 3.3) environmental / sustainability problems in the region and (Table 4.2) for the defined sub-regions including Haven Gateway and Gt Yarmouth/Lowestoft. We note that many of the sustainability issues identified in the table refer to the RSS, but we have not made a through check to see if all relevant issues have been included.

Document B - draft headline objectives

The range of objectives selected is comprehensive and appropriate, as is noted in the introduction to document D, the draft ODPM Guidance on SA of RSSs and LDFs advises (p100) that SA objectives should focus on outcomes. Generally, the objectives do this, but in rather imprecise way - "to reduce X, to improve Y etc". Given that these are sustainability objectives for the area, they should surely be ambitious. Would it not be helpful to express them in rather less relative terms, describing a desired end-state or quantified target? (As currently worded, is a 1% improvement satisfactory? Or a 75%?) You might like to review the wording of the objectives with this in mind (the RSS SA objectives are by no means perfect in this respect, either!)

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SSAG 1. This is useful advice, but this something that is more appropriate for individual authorities to assess locally rather than at a county level. Therefore the framework will not change, but this is something that authorities are encouraged to do when adapting the framework to their own local requirements. The desired outcomes will relate to local targets (e.g. in the Local Area Agreement and other documents).

Document C - compatibility matrix

Agreed that this is a very useful analysis.

Document D - the framework

Our only comment here is about the large number of indicators included - with the implications for the monitoring regime that will be required. Again, the RSS SA has an enormous number of indicators (138) which we shall have to try and reduce to a more manageable total.

SSAG 2. It is not proposed to monitor all of these indicators on a regular basis, but just keep up to date as required for baseline purposes. Indicators are selected to tie in with existing monitoring where possible to minimise additional data collection. For example, we have tried to make use of existing indicators from Suffolk's Environment, BVPIs, and Suffolk Community Strategy, among others.

I hope the above is of some use.

With kind regards,

Alan Wheeler
Regional Planning Consultant: EERA

View from Andrew Hunter, Development Planning Officer, Environment Agency

SEA/SA Objectives

Agree in principle with the draft headline objectives - these should be wide enough to catch majority of, if not all, important environmental issues (and social and economic issues) that may be influenced by Local Development Frameworks.

However, should bear in mind that these objectives should be adapted to take account of local circumstances and concerns as per ODPM consultation paper on Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks. The ODPM consultation suggests local objectives should be added to reflect local-level circumstances; objectives that are irrelevant to the area deleted; and more detailed objectives added.

SSAG 1. It is intended that individual authorities will adapt the framework to meet local requirements. Objectives will also be adapted in such a way to suit different types of plans (e.g. Minerals or Waste Plans), adding more detail objectives where appropriate and removing those not relevant.

I have seen Scoping Reports prepared by a number of LPAs (with assistance from external consultants) that have used between 7 and 14 environmental, social and economic objectives. Attempting to make use of all 23 objectives might prove to be unwieldy. At the district level, it might be worth considering merging some of the social and environmental objectives.

SSAG 2. It is considered that the framework is easier to understand and use with more objectives rather than fewer. Assessing options, conflicts and compatibility will be easier with more specific objectives rather than more general merged ones. However, we do feel there is value in merging the objectives relating to water and mineral resources, to form a new objective "To use water and mineral resources efficiently, and re-use and recycle where possible". The subobjectives and indicators will remain the same (unless covered elsewhere in this document).

From a personal point of view, I am not entirely convinced of some of the ODPM environmental headline/sub-objectives and I would be tempted to change or amend some of these objectives to what I feel are better worded ones in the other SEA/SA Scoping Reports seen by me. There would in any event be an opportunity to reflect local-level circumstances and here the LPA could refine the objectives.

SSAG 3. SSAG would be interested in discussing this further and will ask Andrew Hunter if he could provide examples at the next meeting.

Comments on headline objectives and sub-objectives

Under the headline objective 'To provide for sustainable sources of water supply', I think you have already identified that the sub-objective 'will it reduce water consumption' may present problems in terms of any measurement in a meaningful way. I agree this is probably the case and it may be better to have another think about developing a suitable sub-objective that can be measured. Given the wording of the headline objective, I feel that the something along the lines of promoting sustainable water management might be useful. The issue is essentially the protection of groundwater resources and aquifers. Limiting water consumption so that it is in line with levels supportable by natural processes and existing storage systems is commendable, but again difficult to measure. New development will make additional demands of water supply (for homes, industry, etc) in an area where the capacity of natural systems is limited. The conservation of water resources will be assisted by ensuring new developments are designed to use water efficiently. LPAs include policies that encourage

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water efficiency methods in new development and I wonder if a sub-objective can be developed around such policies. For instance, do LPAs receive any information from developers regarding the inclusion of water efficiency methods in new development that would meet these policies?

The Agency's Catchment Management Abstraction Strategies (CAMS) are looking at water resource availability and once the programme for each catchment area has completed its cycle, we will have a better idea of actual water resource availability. I am not sure whether the findings of each programme will provide data that would help measure the promotion of promoting sustainable water management. I will look into this further and let you know the outcome.

SSAG 4. The objective on water consumption (now a sub-objective, see comment 2) will be changed to "Will it promote sustainable use of water?". SSAG will continue to investigate sources of data such as those suggested above and incorporate additional indicators if possible.

Compatibility matrix

Although the use of the compatibility matrix is in line with ODPM guidance, I wonder if the slimming down of objectives, mentioned above, perhaps through merging objectives with similar themes together, would make the process more manageable.

SSAG 5. Again, it is considered that the framework is easier to understand and use with more objectives rather than fewer. Assessing compatibility will be easier with more specific objectives rather than more general merged ones.

Indicators - baseline review

Once a baseline review has taken place, it would be useful, in terms of picking out key messages from any identified trend, if each indicator was classified as requiring:

- No action
- Needing action
- Priority for action
- Uncertain or unclassifiable

SSAG 6. This is a useful idea but this should also be apparent through the "Issue Identified?" column of the spreadsheet. The group may consider colour coding the entries in this column using these classifications as a key.

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View from Sarah Jennings, Countryside Strategy Officer, Suffolk County Council

Sara

Some comments on the Sustainability Appraisal Framework as promised. Get in touch if you want to discuss any of this further.

Objective - To conserve and enhance biodiversity

Comments on the indicators:

- **'damage to protected sites / reported condition of sites'**. EN carry out condition monitoring of SSSIs and so can provide baseline data. Suffolk Wildlife Trust should be able to provide information on damage to sites when this has occurred through the planning system. Outside of the planning system however there is no consistent monitoring of any sites other than SSSIs and no baseline data exists.

SSAG 1. The indicator will be amended to "Reported condition of SSSIs" to reflect data availability.

- **'% cover of habitat types and achievement of Habitat Action Plan targets'**. The % cover of all habitat types is currently only known for the Coast and Heaths Natural Area (through EN's Lifescapes project). Only information on heathland is available for other parts of Suffolk (through Suffolk Biological Records Centre State of Nature Reports). Phase 1 data on habitats is now 20 years old and therefore out of date. State of Nature Reports will be produced for other habitats but this has not yet been done.

- Should it be % achievement of Habitat Action Plan targets? This can be monitored by the BAP Partnership (although we do not currently have a BAP Officer)

SSAG 2. Following comments from Richard Rafe and Simone Bullion, the framework will now incorporate 2 subobjectives for achievement of Habitat and Species Action Plan targets respectively. As % cover of habitat types is not monitored it will be dropped from the framework.

- **Protection of Suffolk's biodiversity through sampling** - what does this mean and how will it be achieved?? Could change to % achievement of Species Action Plan targets.

- **Bird survey results** - again - what does this mean? Presumably surveys carried out by BTO (breeding bird survey, common bird census, wetland bird survey etc) could provide baseline data. Do the RSPB carry out any surveys other than on their reserves? (potential for using the RSPB volunteer and farmland alliance survey data?) Could we use the PSA target to reverse the long-term decline in the number of farmland birds?

SSAG 3. SSAG has already investigated the farmland bird indicator, and although national data is available, reliable data for the county cannot be sourced. The BTO Breeding Birds Survey is a potential source of some data, but the sample size within Suffolk is too small to be statistically robust or a useful indicator of trends. However, this will be incorporated if possible, if these difficulties can be overcome.

Achievement of BAP targets - how does this relate to the two BAP indicators discussed above?

SSAG 4. See comment 2. The framework will now be revised.

Objective - To improve the health of the population overall:

Consider including actions from SCC 'Promoting healthier communities' such as:
Action 5d - Number of footpaths upgraded to jogging areas (SCC?).

Consider including SCC BVPI relating to rights of way:
BVPI 178 - The % of total length of footpaths and other rights of way which are easy to use by members of the public (SCC).
(this could also go under 'improving the quality of where people live')

SSAG 5. These indicators will be incorporated, although BV 178 is only available for the county as a whole and may not be considered a relevant indicator by individual local authorities.

Objective - To improve the quality of where people live and to encourage community participation:

Include targets from Suffolk Community Strategy / draft Local Area Agreement relating to accessible natural green space.

Target 2 from Chapter 3 of SCS is 'increasing accessible natural green space'.

Indicators: Area of land managed in whole or part for its ecological interest and with public access over and above public rights of way (SCC for SSP)
Areas of deficiency in terms of accessible natural green space (SCC for SSP)
Number of volunteer days spent on natural green spaces (SCC for SSP)
Number of people attending environmental events held at natural green spaces (SSC for SSP)

Is there potential to include the target from the LAA relating to increasing the no. of people involved in volunteering activities? (Outcome G) Baseline data to be established through collation of a range of Council for Voluntary Services activity.

SSAG 6. Two new subobjectives will be added "Will it improve access to natural green space?" and "Will it increase the number of people involved in volunteer activities?". The suggested indicators will be incorporated as data becomes available, with the exception of "Number of volunteer days spent on natural green spaces" and "Number of people attending environmental events held at natural green spaces" which are considered too specific to one sector.

Other comments

* How do you intend to deal with conflicts arising in the compatibility table? Is this going to be discussed further?

SSAG 7. There will always be conflict between different aspects of sustainable growth (e.g. economic growth v environmental protection) but the aim is that the framework can be used to develop and favour options which minimise conflicts and impacts.

Sarah Jennings
Countryside Strategy Officer

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APPENDIX 3: DRAFT SUSTAINABILITY APPRAISAL FRAMEWORK

Early Indicators and Objectives

Defining Core SA Objectives for Suffolk

Sources for proposed SA objectives							Proposed SA Objectives
SA cons paper Sept 04 – Example objectives (guidance for SEA/SA)	SEA Directive Topics	Sustainable Development Framework for East of England October 2001	RSS14 Scoping Report 17/9/04	Suffolk’s Environment Objectives as at October 04 (in brackets 5 yr review objective which may be better)	Other sources through scoping of documents (here we could list the relevant documents, which then cross ref with the scoping documents)	Sustainability issues identified	
Social							
To reduce poverty and social exclusion	Population and human health	To achieve a more equitable sharing of the benefits of prosperity across all sectors of society and fairer access to services, focusing on deprived areas in the region	Share access to services and benefits of prosperity fairly			As a whole the region is doing well economically but social deprivation is high in some areas, Future development should not increase disparities (RSS14) There are pockets of severe deprivation (SDF)	To reduce poverty and social exclusion

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Sources for proposed SA objectives							Proposed SA Objectives
SA cons paper Sept 04 – Example objectives (guidance for SEA/SA)	SEA Directive Topics	Sustainable Development Framework for East of England October 2001	RSS14 Scoping Report 17/9/04	Suffolk's Environment Objectives as at October 04 (in brackets 5 yr review objective which may be better)	Other sources through scoping of documents (here we could list the relevant documents, which then cross ref with the scoping documents)	Sustainability issues identified	
To improve health of the population overall						Though generally good, there are pockets of poor health & A ageing population (SDF) Life expectancy is higher than UK average (SDF)	To improve the health of the population overall
To improve the education and skills of the population overall						Skills and knowledge base seems to be at risk of falling short of that needed for unsustainable growth (SDF)	To maintain and improve levels of education and skills in the population overall

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Sources for proposed SA objectives							Proposed SA Objectives
SA cons paper Sept 04 – Example objectives (guidance for SEA/SA)	SEA Directive Topics	Sustainable Development Framework for East of England October 2001	RSS14 Scoping Report 17/9/04	Suffolk’s Environment Objectives as at October 04 (in brackets 5 yr review objective which may be better)	Other sources through scoping of documents (here we could list the relevant documents, which then cross ref with the scoping documents)	Sustainability issues identified	
To provide everybody with the opportunity to live in a decent home				<p>To ensure that housing provision is affordable and does not exclude certain income groups</p> <p>To ensure an adequate supply of new housing to achieve both the overall Structure Plan target and the quotas set for individual authorities</p> <p>To ensure there is an adequate supply of land to meet Structure Plan requirements</p> <p>To plan to meet the housing requirements of the whole community by providing housing</p>			To meet the housing requirements of the whole community

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Sources for proposed SA objectives							Proposed SA Objectives
SA cons paper Sept 04 – Example objectives (guidance for SEA/SA)	SEA Directive Topics	Sustainable Development Framework for East of England October 2001	RSS14 Scoping Report 17/9/04	Suffolk's Environment Objectives as at October 04 (in brackets 5 yr review objective which may be better)	Other sources through scoping of documents (here we could list the relevant documents, which then cross ref with the scoping documents)	Sustainability issues identified	
				opportunities and choice, including a mix in the size, type and tenure of housing in sustainable locations			
To reduce anti-social activity				To reduce both crime and the fear of crime		Although levels of crime are relatively low, the perception is different (SDF)	To reduce crime and anti-social activity
To encourage a sense of community identity and welfare							To improve the quality of where people live and to encourage community participation
To offer everybody the opportunity for rewarding and				To ensure that all in Suffolk who are able to work can participate in the		Age discrimination ignores the impact of	To offer everybody the opportunity for rewarding and satisfying employment

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Sources for proposed SA objectives							Proposed SA Objectives
SA cons paper Sept 04 – Example objectives (guidance for SEA/SA)	SEA Directive Topics	Sustainable Development Framework for East of England October 2001	RSS14 Scoping Report 17/9/04	Suffolk's Environment Objectives as at October 04 (in brackets 5 yr review objective which may be better)	Other sources through scoping of documents (here we could list the relevant documents, which then cross ref with the scoping documents)	Sustainability issues identified	
satisfying employment				workplace through the maintenance and expansion of the labour market		demographic change (SDF) Some areas have very high unemployment rates (SDF)	
To improve the quality of where people live						Loss of public open space (RSS14)	To improve the quality of where people live and to encourage community participation
To improve accessibility to essential services and facilities				(To maintain and enhance the range, quality and accessibility of facilities for formal and informal recreation) ?		Poor access to services in rural areas. Community vibrancy is low for small communities (RSS14)	To improve access to key services for all sectors of the population
To improve accessibility for those most in need							To improve access to key services for all sectors of the population

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Sources for proposed SA objectives							Proposed SA Objectives
SA cons paper Sept 04 – Example objectives (guidance for SEA/SA)	SEA Directive Topics	Sustainable Development Framework for East of England October 2001	RSS14 Scoping Report 17/9/04	Suffolk’s Environment Objectives as at October 04 (in brackets 5 yr review objective which may be better)	Other sources through scoping of documents (here we could list the relevant documents, which then cross ref with the scoping documents)	Sustainability issues identified	
Environmental							
To reduce the effect of traffic on the environment	Water and soil			To promote and provide for walking, cycling, park and ride and public transport use as alternative modes of travel and reduce the need to rely on the private motor vehicle		High car dependency and strains on public transport infrastructure. Bus service availability relatively poor. High car use impacts on urban form and character, and congestion. (RSS14) Increasing trend towards air travel, leading to increased noise, air pollution and	To reduce the effects of traffic on the environment

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Sources for proposed SA objectives							Proposed SA Objectives
SA cons paper Sept 04 – Example objectives (guidance for SEA/SA)	SEA Directive Topics	Sustainable Development Framework for East of England October 2001	RSS14 Scoping Report 17/9/04	Suffolk's Environment Objectives as at October 04 (in brackets 5 yr review objective which may be better)	Other sources through scoping of documents (here we could list the relevant documents, which then cross ref with the scoping documents)	Sustainability issues identified	
						airport growth (RSS14) Mass transportation is a key unsustainable trend (SDF)	
To improve water quality				To reduce pollution and improve water quality in Suffolk's rivers and estuaries (To maintain and, where possible, enhance water resources / quality)		Inefficient use and pollution of water (SDF Quality of river in rivers is of concern (SDF))	To improve water and air quality
To improve air quality	Air			To ensure that the quality of air in Suffolk is as high as is practicable		Air quality problems, especially on main transport routes, exacerbated by increasing vehicle use (RSS14) Air	To improve water and air quality

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						quality is generally good, but with exceptions at some times of year in some areas (SDF)	
To maintain and enhance biodiversity, flora and fauna	Biodiversity, fauna and flora	To protect and maintain our most valuable regional assets such as designated habitats, landscapes of natural beauty, and our historic built heritage, and to improve the wider environment by means of adequate investment and	Protect and maintain vulnerable regional asset (natural, built and historic environment)	To protect and enhance biodiversity throughout the county		Historical reductions in biodiversity and (semi-) natural habitats, particularly wetlands. Habitat fragmentation. (RSS14) Increasing tourist pressure on fragile environmental assets (SDF)	To conserve and enhance biodiversity

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		management				In some cases biodiversity assets and distinctive landscapes have been reduced to unsustainable levels, and cannot be sustained without increased intervention (SDF)	
To maintain and enhance the quality of landscapes and townscapes	Material assets	To protect and maintain our most valuable regional assets such as designated habitats, landscapes of	Protect and maintain vulnerable regional asset (natural, built and historic environment)	To protect and enhance the quality and local distinctiveness of Suffolk's landscape To protect and enhance the quality		Erosion of quality and distinctiveness in the built environment (RSS14) Reduction in tranquillity	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes

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SA cons paper Sept 04 – Example objectives (guidance for SEA/SA)	SEA Directive Topics	Sustainable Development Framework for East of England October 2001	RSS14 Scoping Report 17/9/04	Suffolk’s Environment Objectives as at October 04 (in brackets 5 yr review objective which may be better)	Other sources through scoping of documents (here we could list the relevant documents, which then cross ref with the scoping documents)	Sustainability issues identified	
		natural beauty, and our historic built heritage, and to improve the wider environment by means of adequate investment and management		and local distinctiveness of the built environment.		since 1960s (RSS14) Pressures on landscape character, e.g. from urbanisation and out of town developments (RSS14) The local character and distinctiveness of settlements and landscape are lost to poorly designed modern development (SDF)	

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To conserve and where appropriate enhance the historic environment	Cultural heritage and landscape	To protect and maintain our most valuable regional assets such as designated habitats, landscapes of natural beauty, and our historic built heritage, and to improve the wider environment by means of adequate investment and management	Protect and maintain vulnerable regional asset (natural, built and historic environment)	To protect designated areas of the historic environment To protect Suffolk’s archaeological interest		Loss of historical assets through major development, bypasses and insensitive development (RSS14) Region has a large number of SAMs at risk, and agricultural practices are often a primary cause (RSS14) Erosion of cultural heritage including historical assets (SDF)	To conserve and where appropriate enhance areas of historical and archaeological importance

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SA cons paper Sept 04 – Example objectives (guidance for SEA/SA)	SEA Directive Topics	Sustainable Development Framework for East of England October 2001	RSS14 Scoping Report 17/9/04	Suffolk’s Environment Objectives as at October 04 (in brackets 5 yr review objective which may be better)	Other sources through scoping of documents (here we could list the relevant documents, which then cross ref with the scoping documents)	Sustainability issues identified	
						Valued historical buildings are at risk of decay, especially historic farm buildings made redundant through changes in agriculture (SDF)	
To reduce contributions to climate change	Climatic factors	To reduce our consumption of fossil fuels	Reduce greenhouse gas emissions Avoid exploiting global environment	To promote and enable the use of renewable energy sources (and energy conservation)		Amount of energy obtained from renewable sources is low compared to UK average, and potential resources (e.g. long	To reduce contributions to climate change

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						coastline) (RSS14) Climate change is a key unsustainable trend, linked to continued use of fossil fuels, and greenhouse gas emissions (SDF) High energy production and consumption (SDF)	
To reduce vulnerability to climate change				To ensure that new development is safe and not exposed unnecessarily to flooding (To locate new development to		Risk to homes and habitats from flooding and climate change (RSS14)	To reduce vulnerability to climatic events

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				minimise the risk from flooding and impact of flood risk on existing development)			
To provide for sustainable sources of water supply						Imbalance between water demand and supply. Lack of water will be a constraint to further development and influence water supply for people, habitats and biodiversity. (RSS14) Inefficient use and pollution of water (SDF) Water	To reduce water consumption

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SA cons paper Sept 04 – Example objectives (guidance for SEA/SA)	SEA Directive Topics	Sustainable Development Framework for East of England October 2001	RSS14 Scoping Report 17/9/04	Suffolk’s Environment Objectives as at October 04 (in brackets 5 yr review objective which may be better)	Other sources through scoping of documents (here we could list the relevant documents, which then cross ref with the scoping documents)	Sustainability issues identified	
						resources are in under growing pressure and critically scarce at times of drought (SDF)	
To minimise the production of waste		To minimise our production of by-products or wastes, aiming for ‘closed systems’ where possible	Cut waste	To promote and enable best practice on waste management, minimising waste arising through encouraging the reuse, recycling and recovery of waste		Increasing amount of waste produced. Region is also a net importer of waste, mainly from London (RSS14) Unsustainable lifestyle changes are leading to high consumption	To reduce waste

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						and waste (SDF) High proportion of waste disposal, rather than re-use, recovery or recycling (SDF)	
To conserve soil resources and quality			Deliver more sustainable use of land	To maximise the development potential of vacant, underused and derelict land and buildings, thus minimising the loss of greenfield land		Impact of intensive agricultural practices on soil quality (nitrogen / nitrates). Region contains 58% of UK's grade 1 and 2 soils and 73% of region is arable. (RSS14)	To conserve soil resources and quality

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SA cons paper Sept 04 – Example objectives (guidance for SEA/SA)	SEA Directive Topics	Sustainable Development Framework for East of England October 2001	RSS14 Scoping Report 17/9/04	Suffolk’s Environment Objectives as at October 04 (in brackets 5 yr review objective which may be better)	Other sources through scoping of documents (here we could list the relevant documents, which then cross ref with the scoping documents)	Sustainability issues identified	
						Intensive agricultural production systems are unsustainable (SDF) Inefficient use of the urban fabric and buildings (SDF)	
		To avoid using the global environment to underwrite our own unsustainable way of life (e.g. dependence on unsustainably produced &/or transported food imports or timber)				Imports and non-local sourcing of food, manufactured goods and other commodities, that could be sourced locally (SDF)	

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		To use natural resources, both finite and renewable, as efficiently as possible, re-use finite resources or recycled alternatives wherever possible	Use natural resources efficiently; re-use, use recycled where possible	To ensure that production of recycled aggregates is maximised each year (To conserve mineral resources in order to meet the long term requirements and ensure restoration to a standard suitable for specific beneficial after use)		Inefficient use of fossil fuels, minerals and raw materials (SDF) Rising demand for resources from lifestyle changes and population growth (SDF) Mineral assets are non-renewable and require wise management (SDF)	To conserve mineral resources

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Sources for proposed SA objectives							Proposed SA Objectives
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Economic							
To encourage sustained economic growth		To achieve sustainable levels of prosperity and economic growth	Achieve sustainable levels of prosperity and economic growth	To achieve sustainable levels of prosperity and economic growth through the establishment, maintenance and expansion of employment uses			To achieve sustainable levels of prosperity and economic growth throughout the plan area
To reduce disparities in economic performance						Economic growth is unevenly distributed & unplanned (SDF)	To achieve sustainable levels of prosperity and economic growth throughout the plan area
To encourage and accommodate both indigenous and inward investment							To encourage and accommodate both indigenous and inward investment

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Sources for proposed SA objectives							Proposed SA Objectives
SA cons paper Sept 04 – Example objectives (guidance for SEA/SA)	SEA Directive Topics	Sustainable Development Framework for East of England October 2001	RSS14 Scoping Report 17/9/04	Suffolk’s Environment Objectives as at October 04 (in brackets 5 yr review objective which may be better)	Other sources through scoping of documents (here we could list the relevant documents, which then cross ref with the scoping documents)	Sustainability issues identified	
To encourage efficient patterns of movement in support of economic growth							To encourage efficient patterns of movement in support of economic growth
To enhance the image of the area as a business location							
To improve the social and environmental performance of the economy							

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Sources for proposed SA objectives							Proposed SA Objectives
SA cons paper Sept 04 – Example objectives (guidance for SEA/SA)	SEA Directive Topics	Sustainable Development Framework for East of England October 2001	RSS14 Scoping Report 17/9/04	Suffolk’s Environment Objectives as at October 04 (in brackets 5 yr review objective which may be better)	Other sources through scoping of documents (here we could list the relevant documents, which then cross ref with the scoping documents)	Sustainability issues identified	
Cross-cutting							
		To deliver more sustainable patterns of location, including employment and housing	Deliver more sustainable location patterns	To locate new development and protect existing services, so as to minimise growth in the length and number of motorised journeys and to maximise use of public transport and other alternatives to the use of private motor vehicles		Rural population increases are putting pressure on biodiversity, transport infrastructure and rural services, exacerbating existing problems. (RSS14)	To reduce the effects of traffic on the environment
		To revitalise town centres to promote a return to sustainable urban living	Revitalise town centres to promote return to sustainable living	To protect and improve the vitality and viability of town centres by offering a range of community, shopping and employment opportunities		Town centres continue to be undermined by out of town shopping and business parks (SDF)	To revitalise town centres

Document (b) - Draft Headline Objectives

Social

1. To improve the health of the population overall
2. To maintain and improve levels of education and skills in the population overall
3. To reduce crime and anti-social activity
4. To reduce poverty and social exclusion
5. To improve access to key services for all sectors of the population
6. To offer everybody the opportunity for rewarding and satisfying employment
7. To meet the housing requirements of the whole community
8. To improve the quality of where people live and to encourage community participation

Environmental

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

Economic

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

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APPENDIX 4: RESPONSES FROM CONSULTATIONS REGARDING DRAFT BABERGH SUSTAINABILITY APPRAISAL SCOPING REPORT

(February 2007)

Name of Consultee	Paragraph No in Response	Subject	Proposed Change	The Council's Response
Environment Agency	No 2	Context review Task A1	Relevant plans and programs scoped needs to be updated	Yes this is accepted, but plans are being changed or updated regularly, so it is likely that some plans will have changed
Environment Agency	No 3	Context review Task A1 Para 20 PPS1	The Council should take account of flood risk management	The point is accepted and one of the objectives relates to this
Environment Agency	No 4	Context review Task A1 Para 36 PPS1	Flooding should be taken into account in design	The point is noted
Environment Agency	No's 4 - 13	Context review Task A1 Various PPS's and other documents	Various documents should be scoped including new PPS's & Flood Management Plans	The Council will scope the documents relevant to Babergh
Environment Agency	No's 14 & 15	Context review Task A1 Haven Gateway studies	The East of England Plan should be taken into account when developing the LDF	The point is noted
Environment Agency	No 16	Context review Task A1	Report should show the Web site address for the scoped documents	This is noted and could be included
Environment Agency	No 17	Methodology Task A2	Consider an indicator relating to SUDS	Noted

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Name of Consultee	Paragraph No in Response	Subject	Proposed Change	The Council's Response
Environment Agency	No 18	Methodology Task A2	Possible indicator relating to contaminated land	Noted
Environment Agency	No's 19 and 20	Methodology Task A2	Haven Gateway water cycles study should inform the LDF process	The full report will need to be studied in order to assess the implications for Babergh
Environment Agency	No's 21 and 22	Methodology Task A2	The sequential testing of development locations for flood risk should be carried out in accordance with PPS 25	Noted, it is the intention of Babergh to fully comply with the relevant section of PPS 25
Environment Agency	No 23	Methodology Task A2	The council should carry out a Strategic Flood Risk Assessment	Noted, it is the intention of Babergh to carry out an SFRA
Suffolk CC	First two para's General comments	General comments on the approach	Objectives should be more local and take onboard emerging environmental issues	Whilst the comments are noted, they make assumptions about what issues or options are important to Babergh, which has not yet been determined through the LDF process. A new monitoring framework will be developed after the Core Strategy has been finalised and it is possible that these or similar objectives could emerge
Suffolk CC	2 nd 2 Para's	Task A1 – Context Review	Various documents should be scoped and the most up to date documents listed	The comments are noted and the list will be updated as well as new documents scoped. This is an ongoing process

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Name of Consultee	Paragraph No in Response	Subject	Proposed Change	The Council's Response
Suffolk CC	3 rd 2 Para's	Table 2	Comments relating to the 'historic environment'	The comments are noted and 'historic environment' will be added to the relevant objective
Suffolk CC	Task A2	Table 4	Updating of data sources and indicators	The comments are noted and the data sources and indicators will be updated
Suffolk CC	Task A2	Para 3.3	Need to refer to the 'historic environment'	Noted, the 'historic environment' will be added as suggested
Suffolk CC	Task A2	Table 6	Comments relating to household waste and car ownership	The comments are noted and the information will be updated
Suffolk CC	Task A3	Identifying sustainability issues and problems	There is a lack of detail in the analysis of the issues, which are important and particular to the district	The point is accepted and changes shall be made, but further studies are to be carried out, such as the housing market assessment which will help to put more "flesh on the bones" than is outlined in the scoping report
Suffolk CC	Task A4	Developing the Sustainability Appraisal Framework	Comments on the SA objectives and the level of detail in the framework, saying a summary is better for comparison	In the past Babergh has produced both detailed and summary documents for the SA and it is likely that the same will happen again. The objectives will be looked at again
Suffolk CC	Task A5	Consulting on the scope of the Sustainability Appraisal	Natural England incorporates the Countryside Agency. What are the Council's future intentions for consultation on the document?	Babergh are aware of the changes and functions of Natural England. The intention was to see what comments were made on the draft document before deciding how it would be dealt with in the future. The amendments proposed by consultees will be added

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Name of Consultee	Paragraph No in Response	Subject	Proposed Change	The Council's Response
				and then the document will be used as a basis for carrying out a Sustainability Appraisal, without a further period of consultation.
Suffolk CC	Baseline Data 2006	Detailed comments on some Baseline Data	Detailed comments have been made on some of the original data	The comments are noted but pollution from traffic may be an issue in certain locations, it was suggested that this indicator is dropped
Natural England	Section 2.1	Review of relevant policies, plans etc.	Various new plans are listed	These are noted and shall be included
Natural England	Section 2.2	Sustainability objectives and SEA	Geodiversity should be added to objective 16	This shall be added
Natural England	Section 3	Baseline information and analysis of trends – Table 4	Access to public rights of way is not mentioned as an indicator. Other indicators should be included.	Access to public rights of way is included as a countywide indicator but not down to district level. Geological interest will be added to one of the indicators
Natural England	Section 3	Baseline information and analysis of trends – Table 6	Refers to a decrease in the area of AONB's	This comment will be deleted from the final version as it is believed that it was caused by an updating of measurements rather than an actual change in the area
Natural England	Section 5	Developing the sustainability appraisal framework – Table 9	There is more likely to be conflict between objectives 17 and 18	Noted and the table will be amended
RSPB	Introductory paragraphs	Approach to SA and SEA	A new reference is given, and comments on the approach have been made	These are noted and the reference will be considered

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Name of Consultee	Paragraph No in Response	Subject	Proposed Change	The Council's Response
RSPB	Task A1	Context Review	New documents are listed to be reviewed	These documents will be reviewed
RSPB	Task A2	Profile of Babergh	A map should be produced of the district to show the biodiversity of the district. Bird data sources are suggested	The council will consider producing a map to show the biodiversity of the district, and notes the new sources
RSPB	Environmental Profile	To conserve and enhance Biodiversity	More detail should be given on each of the SSSIs and Ramsar sites	This information would be too detailed to put into the SA
RSPB	Environmental Profile	Soil resources	Greenfield dwelling site commitments should be recorded	These are recorded as part of the normal monitoring process
RSPB	Environmental profile	Climate Events and Climate Change	RSPB support the use of renewable energy and are concerned about sea and river flooding	The comments are noted
RSPB	Task A3	Sustainability issues facing the District	The RSPB are satisfied that Babergh have identified the correct sustainability issues for the district	Noted
RSPB	Task A4	The Sustainability Appraisal Framework	The RSPB accepts Babergh's general approach to the SA. They would like to be involved in the consideration of development proposals	Noted

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Name of Consultee	Paragraph No in Response	Subject	Proposed Change	The Council's Response
RSPB	Appropriate Assessment	Habitats Directive	Babergh should be aware of the Habitats directive and ensure it is applied when appropriate	Babergh shall ensure that the relevant methods are used when they are necessary
Suffolk Wildlife Trust	Two documents listed for consideration	ODPM Circular 06/2005 and BSI PAS 2010 of 2006	Both documents deal with biodiversity and should be scoped	The documents will be scoped and added to the list
Suffolk Wildlife Trust	Paragraph on indicators	Biodiversity indicators	SWT are satisfied with the range of indicators chosen but suggest Babergh consider making some relevant 'smart targets'.	The comments are noted, but it may be more appropriate that the targets are set out as part of the monitoring framework for a particular document
Suffolk Wildlife Trust	Paragraph relating to designated sites	SSSI's and County Wildlife Sites are given as examples	Sites both statutory and non-statutory should be monitored for changes	These sites are already shown in the baseline document
Suffolk Wildlife Trust	Paragraph relating to Table 10	Evaluation objectives for biodiversity	The current first sub-objective should be separated from the consideration of European designated sites	This would add complexity to an already long list of sub-objectives and if the only site affected is of European designation, then it will be considered in isolation
Children's Services, Education Dept., SCC	Paragraphs relating to the Children and Young Persons Plan (CYPP)	Links between the CYPP and the SA process	There are clear links between the sustainability objectives and the CYPP, particularly around sustainable communities	This is noted

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Name of Consultee	Paragraph No in Response	Subject	Proposed Change	The Council's Response
Children's Services, Education Dept., SCC	Later 3 paragraphs relating to new indicators	Possible new indicators relating to the CYPP	A series of new indicators are suggested specifically relating to children	Some indicators can be included as a sub set of one of the existing indicators. Others may be monitored as part of the monitoring framework following the adoption of a new Development Plan Document
EEDA	The whole letter refers to implementing the regional economic strategy	Implementing the Regional Economic Strategy	Specific elements of the strategy are listed, not all are relevant to Babergh, but many are generic and refer to general issues such as provision for business or improving skill, promoting sustainable development etc	The comments are noted and can assist with the appraisal of policies and proposals.
SCC Strategic Environmental Assessment	Local identity and distinctiveness		Maps showing local features or designations e.g. flood risk areas or biodiversity issues to show local flavour and conditions	This is a good idea and may be used in the future as part of the assessment process
English Heritage	SA objectives	Landscape and townscape	The objectives are considered appropriate and landscape and townscape have a strong historical dimension	The points are noted
English Heritage	Baseline information	Indicators	More qualitative judgements should be made about the historic character and value of an area	The point is noted and the value of this may become apparent in Babergh's community involvement when developing LDF documents