

Redeposit Replacement St Edmundsbury Borough Local Plan 2016

Redeposit Replacement Local Plan Sustainability Appraisal

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Appendix A – Stock Criterion

Appendix B – Site Sustainability Assessments

Chapter 1: Introduction

1.1 Context

The principle of sustainable development encompasses social, environmental and economic issues, entailing concern with present and future generations. The St Edmundsbury Borough Council Replacement Local Plan Sustainability Appraisal provides a means of defining, measuring and articulating sustainability, enabling sustainable development in the borough. The Appraisal aims to ensure that the policies within St Edmundsbury Borough Council's Replacement Local Plan are compatible with each other and general sustainability aims, in accordance with Government Guidance contained in PPS12 "Local Development Frameworks", which expects all local authorities to undertake appraisals of their development plans. The appraisal process will evolve with any changes that are made to the Local Plan.

1.2 Aims

The Replacement Local Plan Sustainability Appraisal aims to be:

- A systematic review of the draft Replacement Local Plan policies, in order to evaluate their impacts on achieving sustainable development.
- An integral part of the plan making and review process, which allows for the evaluation of alternatives.
- Based on a range of environmental, social and economic criteria for achieving sustainable development.

1.3 The Scope of the Replacement Local Plan Sustainability Appraisal

The Appraisal considers social, economic and environmental aspects of sustainable development, whilst recognizing intra-generational and inter-generational themes. The Appraisal is also location specific, accounting for factors relating expressly to the borough of St Edmundsbury.

Chapter 2: Methodology

2.1 The Local Plan Sustainability Appraisal process

Initially the policy to be appraised is identified and the alternative scenario (see 2.2) is defined. The policy is then measured against each sustainability stock criterion (see 2.3) using the policy impact assessment (see 2.4). Subsequently each policy is given an overall policy impact symbol and finally each chapter appraisal is concluded, highlighting the main issues arising from the chapter appraisal (see 2.5). The strategic aims of the Replacement Local Plan are also assessed.

2.2 Alternative Scenario

Alternative scenarios are included in the appraisal of each chapter of the draft plan to enable an objective and comprehensive analysis of each policy. The alternative scenario is a baseline assessment of the consequences if the policy was absent, allowing a clear understanding of the need for each policy.

2.3 Sustainability stock criteria

The criteria utilised are those recommended in Suffolk's Environment: A Methodology for the Sustainability Appraisal of Development Plans (Suffolk Local Planning Authorities, 2001, see Appendix A). These criteria were selected as they encompass the triple bottom line of sustainability, including social, economic and environmental factors. Coastal issues were excluded from the criteria; therefore they apply to St Edmundsbury Borough Council's remit. The following sustainability stock criteria are used:

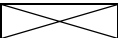
- Transport: Trips
- Transport: Modes
- Biodiversity
- Landscape
- Townscape
- Cultural Heritage
- Minerals
- Water Conservation and Quality
- Flood Risk
- Air Quality
- Open Space
- Brownfield Land
- Land Pollution
- Agriculture and Forestry
- Energy Conservation
- Thriving Communities
- Well Being
- Economic Development
- Equity

Each criterion has a set of indicators allowing each policy to be appraised identically (see Appendix A). The Sustainability Appraisal specifically measures direct impacts. To have a direct impact on any sustainability stock criterion a policy must alter that stock through its implementation and have an impact within the borough. The impact of the policy must be obvious and unambiguous.

2.4 Policy impact assessment matrix

Table 1 illustrates the policy impact assessment symbols used in this Sustainability Appraisal. Symbols are provided to monitor beneficial, adverse and neutral impacts, a symbol is also provided to indicate uncertainty. All uncertainty symbols are combined as any assumptions made within the appraisal will be subjective. Neutral impact and no relationship symbols have also been merged as the policies under these categories have the same effect.

(Table 1: Policy impact assessment symbols)

Impact Symbols	Policy Impact
+	Beneficial
	Adverse
?	Uncertain
0	Neutral impact / no relationship

2.5 Conclusions

A concluding policy impact assessment symbol is included at the end of each policy appraisal. The concluding symbol does not represent the most frequently occurring symbol in that assessment, but reflects the overall impact of that policy taking mitigating details into consideration. A conclusion is also incorporated at the end of each chapter to describe the implications of the Sustainability Appraisal and account for any unclear policy impact assessment symbols.

2.6 The strategic aims of the Replacement Local Plan

The strategic aims in the draft Local Plan are appraised against social, economic and environmental aims of sustainable development. The compatibility of the strategic aims of each chapter is also assessed. The compatibility symbols outlined in Table 2 are used to assess the strategic aims.

(Table 2: Compatibility symbols)

Compatibility symbol	Compatibility assessment
C	Compatible
I	Incompatible
?	Uncertain
0	Neutral impact/no relationship

Chapter 3: Strategic aims

3.1 Compatibility with general sustainability aims

Sustainability is a multi faceted concept, covering environmental, social and economic concerns. To ensure that the vision of the Draft Replacement Local Plan is compatible with the aims of sustainability the following criteria have been applied.

1. Environmental: The environmental element of sustainable development includes the conservation and preservation of natural resources and mitigation measures against pollution and contamination. Sustainable development also includes the protection of biodiversity, as well as the safeguarding of important landscape and townscape features.

2. Social: Sustainable development considers social equality and equity providing for minority groups within society. Sustainable development also includes the vitality, well being and quality of life of citizens at present and in the future.

3. Economic: Employment diversity and locally important industries are taken into account, encouraging economic growth in the locality. Economic development must bring benefits to producers, manufacturers and consumers. Sustainable economic development can lead to increases in employment and economic activity without increasing the consumption of finite resources. Primary, secondary, tertiary and quaternary industries are all included in the economic development component of sustainable development.

(Table 3: Strategic aim compatibility with general sustainability aims)

Chapter	Strategic aim	1. Environmental	2. Social	3. Economic
Housing	Strategic aim A: To meet the requirements for housing in such a way that will best serve the whole community.	?	C	0
Employment	Strategic aim B: To secure economic vitality and wealth creation in all communities without causing unacceptable harm to the environment.	?	C	C
The Rural Area	Strategic Aim C: To sustain and enhance rural communities while maintaining and where possible improving the rural environment	C	C	C
Leisure	Strategic aim D: To maintain and develop leisure, cultural, educational and community facilities to meet the needs of residents and visitors.	0	C	C
Town Centres and Retail	Strategic aim E: To provide opportunities for people to shop for all their needs by sustainable means in town centres, and rural centres where appropriate, which are viable and thriving locations.	0	C	C
Transport	Strategic aim F: To enable people and goods to move around efficiently and safely to benefit the economy and community with minimum harm to the environment by seeking to reduce car dependency and encouraging more sustainable forms of transport where appropriate.	?	C	C
Local Heritage	Strategic Aim G: To maintain and improve the quality of the built environment.	C	C	0
Natural Environments	Strategic aim H: To achieve a balanced natural environment where the use of resources and energy is minimised, materials and waste recycled and development undertaken with minimum adverse impact giving close regard to the principles of sustainability.	C	C	?
Facilities for the Community	Strategic aim I: To ensure that existing and new development is adequately served by community facilities and public services.	+	+	0

Conclusion

Compatibility symbol	Compatibility assessment
C	Compatible
I	Incompatible
?	Uncertain
0	Neutral impact/no relationship

Compatibility between environmental, social and economic issues is a key factor of sustainability, the above analysis reveals that complete sustainability is difficult to achieve, however the Borough Council is moving towards it through these strategic aims. For example, the current rate of housing growth is not environmentally sustainable and this could have detrimental impacts on the social and economic aspects of sustainable development in the future. Conversely the Borough council must meet housing need and the strategic aims make the Borough Council's land-use aims less detrimental.

Compatibility symbol	Compatibility assessment
C	Compatible
I	Incompatible
?	Uncertain
0	Neutral impact/no relationship

3.2 Compatibility of Strategic Aims

Table 4 displays the compatibility of the Strategic Aims of each chapter in St Edmundsbury Borough Council's Local Plan. (Table 4: Compatibility of strategic aims)

Chapter	Strategic Aims								
1. Housing	Strategic aim A: To meet the requirements for housing in such a way that will best serve the whole community.	1							
2. Employment	Strategic aim B: To secure economic vitality and wealth creation in all communities without causing unacceptable harm to the environment.	0	2						
3. The Rural Area	Strategic Aim C: To sustain and enhance rural communities while maintaining and where possible improving the rural environment	C	C	3					
3. Leisure	Strategic aim C: To maintain and develop leisure, cultural and community facilities to meet the needs of residents and visitors.	0	C	C	4				
4. Town Centres and Retail	Strategic aim D: To provide opportunities for people to shop for all their needs by sustainable means in town centres which are viable and thriving locations.	0	C	0	0	5			
5. Transport	Strategic aim E: To enable people and goods to move around efficiently and safely to benefit the economy and community with minimum harm to the environment.	0	C	?	0	C	6		
6. Local Heritage	Strategic aim F: To maintain and improve the quality of the built environment throughout the borough.	?	?	C	0	0	?	7	
7. Natural Environments	Strategic aim G: To achieve a balanced natural environment where the use of resources and energy is minimised, materials and waste recycled and development undertaken with minimum adverse impact.	?	0	C	0	0	0	0	8
8. Facilities for the community	Strategic aim H: To ensure that existing and new development is adequately served by community facilities and public services.	C	0	C	C	0	C	0	0

Compatibility symbol	Compatibility assessment
C	Compatible
I	Incompatible
?	Uncertain
0	Neutral impact/no relationship

Conclusion

The neutral impact/ no relationship symbol is used when the strategic aim is specific to one subject, and consequently has no direct relationship with the strategic aims that do not cover that subject. A number of the strategic aims are exclusive to specific chapters, consequently many are not interconnected, and as a result the neutral impact / no relationship symbol is used repeatedly in this analysis. The sustainability of the borough is dependant on the success of the implementation of these strategic aims.

Compatibility symbol	Compatibility assessment
C	Compatible
I	Incompatible
?	Uncertain
0	Neutral impact/no relationship

Chapter 4: Development strategy chapter appraisal

The Development Strategy chapter sets out the strategic aims of the Local Plan and contains policies that set a framework for the Local Plan's approach to development. The principles set out in the chapter consider the environmental, social and economic aspects of sustainability and specifically the effects of these principles on the population of the borough.

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
DS1: Settlement hierarchy	Haphazard development	+	+	0	0	?	0	0	0	?	?	0	+	0	⊗	+	?	0	+	0	+
DS2: Development in the countryside	Unrestricted development in the countryside	+	+	+	+	+	+	0	0	0	?	?	+	+	+	+	?	0	+	0	+
DS3: The sequential approach to development	Haphazard development	+	+	+	+	+	+	0	0	0	0	0	+	+	+	+	+	0	?	0	+
DS4: Development design and impact	Inappropriate and conflicting development	0	0	0	+	+	+	0	0	+	0	?	0	0	0	+	+	+	0	+	+
DS5: Master plans	Haphazard and ill conceived development	+	+	0	+	+	0	0	0	+	0	+	0	0	0	+	+	+	+	+	+

Impact Symbols	Policy Impact
+	Beneficial
⊗	Adverse
?	Uncertain
0	Neutral impact / no relationship


Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
DS6: Design guidance, and development briefs	Increased refusals due to non compliance with SPGs	0	+	0	0	+	0	0	0	+	0	+	0	0	0	0	+	+	+	+	+

Conclusion

St Edmundsbury Borough Council’s sequential policy has both positive and negative impacts on the community’s needs. Residents of Bury St Edmunds express concern that new development could have a negative impact on the town, whilst Haverhill residents feel that development could provide an opportunity to improve the town¹. Some rural communities that do not occupy a CS3 (e) settlement² encourage development in their area to maintain local services. However, protecting the rural settlements in St Edmundsbury and meeting housing needs are priorities for the Borough Council. The intent of policies DS1 and DS3 is sustainable, as these policies safeguard villages and restrict urban sprawl. Most of the policies in the Development Strategy chapter have a positive impact on energy conservation. The chapter encourages clustering of residential areas, facilities and services, reducing dependency on cars. Congregating development also causes the concentration of pollution, maintaining air quality elsewhere whilst causing degradation on the development site, this caused uncertainty in the assessment of air quality in policies DS1 and DS3. Policy DS1 scores poorly in agriculture and forestry as, although brownfield land is prioritised, the policy does allow for development on greenfield sites, which are frequently located on agricultural land. Designating agricultural land has a negative impact on safeguarding this resource, but also aids in nature conservation as agricultural land is often less species rich and biodiverse, positively influencing the sustainability of the policy. Master plans and development briefs are a particularly vital step towards sustainability as key issues are identified at an early stage.

¹ Issues report response (2000) and community workshops (2002)

² CS3(e) settlement as defined in the County Structure Plan

Impact Symbols	Policy Impact
+	Beneficial
	Adverse
?	Uncertain
0	Neutral impact / no relationship

Chapter 5: Housing chapter appraisal


The aim of the Housing chapter is to meet housing needs through the provision of mixed housing at sustainable locations. Each site is assessed according to sustainability criteria, environmental considerations are also taken into account. The chapter also aspires to meeting the needs of the community, contributing to the social aspect of sustainable development. The policies within the chapter place constraints on the market to create balance, a vital contribution to the economic aspect of sustainable development.

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
H1 Scale of housing provision	Unchecked greenfield development and new settlements	+	0	?	+	?	0	0	?	0	?	0	+	+	+	+	?	?	+	0	+
H2 Phasing	Unregulated development on greenfield sites	+	0	?	+	?	0	0	?	0	?	0	+	+	+	+	?	?	+	0	+
H3 Housing development within Bury St Edmunds and Haverhill	Unregulated development in towns	+	+	0	+	?	0	0	0	0	0	?	?	0	+	+	+	0	0	0	+

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
H4 Affordable housing	Sites without affordable housing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	+	+
H5 Housing density	Low density development that does not maximise land use	+	0	0	0	?	0	0	0	0	0	0	0	0	0	0	?	0	?	0	+
H6 Mix of housing	Monotonous development that does not meet a range of requirements	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	+	0	0	+	+
H11 Alterations or extensions to dwellings	Inappropriate alterations and extensions to dwellings.	+	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+
H7 Special housing needs	Inadequate accommodation facilities	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	0	+	+
H9 Provision for gypsies and travelling people	No provision for gypsies and travelling showpersons.	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	?	?	0	+	+

Conclusion


The impacts of policies H1 and H2 are dependant on a number of site specific factors and consequently it is difficult to assess these policies. Many of the variable stock criteria are covered by the site sustainability appraisals (an assessment of the sustainability of potential development sites, see Appendix B); consequently factors such as biodiversity, water conservation and quality, and air quality will be accounted for at the site proposal stage. Site sustainability assessments also ensure that development is based close to facilities and services, reducing the length of transport trips, having a positive impact on the environmental element of sustainable development. Greenfield and brownfield developments can both harm biodiversity and consequently environmental conservation issues are site specific. Greenfield allocations can reduce available farmland and are frequently less accessible than brownfield sites and therefore prioritising brownfield development is sustainable. The inclusionary element of the housing chapter is also sustainable, promoting social equity through providing affordable housing and accommodation for those with special needs.

Impact Symbols	Policy Impact
+	Beneficial
	Adverse
?	Uncertain
0	Neutral impact / no relationship

Chapter 6: Employment chapter appraisal


The aim of St Edmundsbury Borough Council's Replacement Local Plan Employment Chapter is to secure economic vitality and wealth creation throughout the borough, without harming the natural or built environment. The chapter is inclusive as it targets all sectors of society, contributing to the social element of sustainability. The chapter also contributes to the economic aspect of sustainability by promoting wealth creation and economic vitality. Finally the land use policy framework for employment development seeks to safeguard the environment, now and in the future, another essential element of sustainable development.

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
E1 Redevelopment of existing employment land or premises	Loss of employment land to alternative uses	+	+	0	0	?	0	0	0	0	?	0	+	0	0	0	?	0	?	0	+
E2 Office development	Uncontrolled office development	+	+	0	+	?	0	0	0	0	0	0	?	0	0	0	?	0	?	0	?

Impact Symbols	Policy Impact
+	Beneficial
	Adverse
?	Uncertain
0	Neutral impact / no relationship

Conclusion


PPG3 promotes that residential development should occur on brownfield land. A direct impact of this guidance is a shortage of brownfield land for employment sites. As a consequence the Borough Council will have to allocate greenfield land for employment growth. St Edmundsbury's approach is sustainable overall as low agricultural / environmental quality greenfield sites have priority. Office development is restricted to Bury St Edmunds and Haverhill in order to reduce car use. The policy will have a positive impact on the landscape of other settlements in the borough, as greenfield sites will be preserved. Policy E1 seeks to retain existing community employment sites within settlements which have not given rise to environmental problems, preserving a mix of uses and local employment opportunities.

Impact Symbols	Policy Impact
+	Beneficial
	Adverse
?	Uncertain
0	Neutral impact / no relationship


Chapter 13 The Rural Area

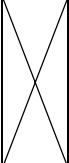
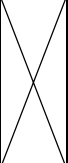
The aim of the rural area chapter is to sustain and enhance rural communities while maintaining and where possible improving the rural environment. The chapter promotes the sustainable re-use of rural buildings for employment purposes. The promotion and protection of rural services helps to create sustainable rural settlements.

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
RU1 Employment development in the rural areas	Inappropriate or excessive employment development in rural areas	+	0	0	?	+	0	0	0	0	0	0	0	0	0	0	?	0	-	0	+
RU2 Farm Diversification	Inappropriate opportunities for farmers to provide employment and services	?	0	0	0	0	0	0	0	0	0	0	0	0	+	0	?	0	+	0	+

Impact Symbols	Policy Impact
+	Beneficial
	Adverse
?	Uncertain
0	Neutral impact / no relationship


Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
RU4 Reuse of rural buildings	No restrictions on conversions of rural buildings	+	0	0	+	0	0	0	0	0	0	0	0	0	+	0	0	0	+	0	+
RU5 Replacement of buildings in the rural areas	No restrictions on the replacement of rural buildings	?	?	0	?	0	0	0	0	0	0	0	+	0	0	0	?	0	+	0	+
RU6 Housing development in the rural areas	Unregulated development in the countryside	+	0	0	+	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	+
RU7 Removal of agricultural occupancy conditions	Loss of agricultural accommodation	0	0	0	+	0	0	0	0	0	0	0	0	0	+	0	0	0	0	+	+
RU8 Rural housing exceptions sites	Development that does not meet the rural communities housing needs	+	0	0	+	0	0	0	0	0	0	0	0	0	+	0	0	0	0	+	+
RU9 Retail proposals within rural housing settlement boundaries	Detrimental effect on existing centres	?	+	0	0	?	0	0	0	0	0	?	?	0	0	0	+	0	?	+	+

Impact Symbols	Policy Impact
+	Beneficial
	Adverse
?	Uncertain
0	Neutral impact / no relationship

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
RU10 Rural services	Loss of rural services	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	+	0	0	+	+
RU11 Touring holiday caravan and camping sites	Inappropriate and intrusive touring holiday caravan and camping facilities in the rural areas			0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0

Conclusion


The sustainable economic development of the rural areas is promoted within this chapter. The policies contained within the chapter relate well to the environmental aspects of sustainability, serving to maintain or, where possible, enhance the landscape of the rural areas. Improving and maintaining rural services makes a significant contribution to equity, a key factor in the social aspect of sustainability.

Impact Symbols	Policy Impact
+	Beneficial
	Adverse
?	Uncertain
0	Neutral impact / no relationship

Chapter 7: Leisure chapter appraisal

The aim of the leisure chapter is to balance the recreational needs of residents and visitors with the conservation of the natural environment. The aim contributes to sustainable development as both the needs of the natural environment and the needs of the local community are considered. The economic aspect of sustainable development is also accounted for, as developing and enhancing leisure and tourism facilities creates wealth generation.

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
L1 Golf courses and related facilities	Poorly located and laid out golf courses	0	0	+	+	0	0	0	0	0	0	+	0	0	0	0	0	0	?	0	+
L2 Tourism development	Inappropriate tourism development	0	+	0	+	+	0	0	0	0	0	0	0	0	0	0	?	0	-	0	+
L3 Visitor accommodation	Unregulated development of visitor accommodation	+	0	0	+	0	0	0	0	0	0	0	+	+	?	0	0	0	0	0	+
L4 Standards of open space provision	Non compliance with open space standards	0	0	0	+	+	0	0	0	0	0	+	0	0	0	0	+	+	0	+	+

Impact Symbols	Policy Impact
+	Beneficial
	Adverse
?	Uncertain
0	Neutral impact / no relationship

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
L5 Safeguarding parks and open spaces	Little or no protection of open areas	0	0	0	?	+	0	0	0	0	0	+	0	0	0	0	+	+	0	+	+
L7 Allotments	Little or no protection for allotments	0	0	0	0	?	0	0	0	0	0	+	0	0	0	0	+	+	0	+	+
L8 Public rights of way	Less access	0	+	0	+	+	0	0	0	0	0	+	0	0	⊗	0	+	+	0	+	+

Conclusion


Locally important facilities are made more accessible in the leisure chapter, however the effect of policy L1 on transport: trips is debatable. An increase in facilities could generate an increase in trips or could reduce the length of trips people make if more facilities are provided in their locality. Reference to policy DS3 within the criteria of policy L1 increases the concentration of facilities, having a direct positive impact on modes of transport. Policy L4 also refers to policy DS3, restricting the dispersal of visitor accommodation and reducing reliance on the private motor car. Public rights of way have a negative impact on agriculture as agricultural land is made accessible to the public. However provision of rights of way, open space, casual play areas and local parks has a positive impact on quality of life.

Impact Symbols	Policy Impact
+	Beneficial
⊗	Adverse
?	Uncertain
0	Neutral impact / no relationship


Chapter 8: Town Centres and Retail chapter appraisal

The aim of the town centres and retail chapter is to encourage vitality in town centres through mixed use. The encouragement of mixed use contributes to sustainable development by increasing economic diversity, as well as providing more facilities for the community and a range of services. The policies encourage the improvement of the built environment by ensuring that shop fronts are protected and inappropriate uses are restricted. The principle impacts of the chapter on sustainability are improvements in quality of life.

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
TCR1 Shopping centres	Loss of mixed uses and facilities	?	?	0	0	?	+	0	0	0	0	0	+	0	0	0	+	?	+	+	+
TCR2 Major Retail Developments in Shopping Centres	Detrimental/unsatisfactory development	0	+	0	0	+	?	0	0	0	0	0	0	0	0	0	+	0	?	+	+
TCR3 Retail development outside shopping centres	More outlets in unsustainable locations	+	+	0	0	?	0	0	0	0	0	0	?	0	0	0	+	0	?	+	+

Impact Symbols	Policy Impact
+	Beneficial
	Adverse
?	Uncertain
0	Neutral impact / no relationship


Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
TCR4 Protection of shopping frontages and shopping centres	Loss of shopping frontages	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	+	0	0	0	+
TCR5 Shop fronts and advertisements	Poorly designed new shop fronts and advertisements and loss of old shop fronts and advertisements	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	?	0	0	0	+
TCR6 Amusement arcades	More amusement arcades in sensitive areas	0	0	0	0	?	0	0	0	0	0	0	0	0	0	0	?	+	0	0	+

Impact Symbols	Policy Impact
+	Beneficial
	Adverse
?	Uncertain
0	Neutral impact / no relationship

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
TCR7 Street trading and street cafes	Obstructive and unsafe street trading and street cafes	?	0	0	0	+	0	0	0	0	0	0	0	0	0	0	+	0	+	0	+
TCR8 Ancillary retail uses	Unrestricted retailing	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+

Conclusion


Mixed use in town centres is both positive and restrictive for economic development. Varied development improves economic vitality, whilst also placing essential restrictions which could be economically detrimental to the development industry. Mixed development has a positive effect on transport trips as the actual number of trips is considered with reference to the length of those trips. The chapter also considers sustainable modes of transport, sustainable modes should also be considered in local retail policies, as the public drive short distances. It is assumed in the analysis that retailing always has a positive impact on the town centre.

Impact Symbols	Policy Impact
+	Beneficial
	Adverse
?	Uncertain
0	Neutral impact / no relationship

Chapter 9: Transport chapter appraisal

The transport chapter aims to enable the community and goods to travel whilst causing minimum harm to the environment. Efficient transport systems benefit the economic aspect of sustainable development as commodities can move freely. The chapter also benefits the social aspect of sustainable development as accessible, inclusionary modes of transport are encouraged. Safeguards for the environment are also included in the chapter.


Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
T2 Transport assessments	Developments without sustainable transport	+	+	0	0	?	0	0	0	0	+	0	0	0	0	0	0	0	0	0	+
T3 Hierarchical approach to site access	Prioritised car use	?	+	0	0	0	0	0	0	0	?	0	0	0	0	0	0	0	0	0	+
T4 Travel plans	Large developments without sustainable transport	+	+	0	0	+	0	0	0	0	+	0	0	0	0	0	0	0	0	0	+
T5 Private non-residential parking	Increased no. of parking spaces	?	?	0	0	+	0	0	0	0	+	0	0	0	0	0	0	0	0	0	+
T6 Parking standards	Haphazard parking in development proposals	0	+	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+

Impact Symbols	Policy Impact
+	Beneficial
	Adverse
?	Uncertain
0	Neutral impact / no relationship

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
T7 Off street car parking	Town centre congestion	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	+	+	0	+
T8 Lorry parking	Lack of lorry parking areas	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	?	0	+
T9 Cycling and pedestrian strategies	Over reliance on motorised transport	0	+	0	0	+	0	0	0	0	+	0	0	0	0	+	0	+	0	+	+
T10 Roadside services	Haphazard development	0	0	0	+	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+

Conclusion


The transport chapter follows the principles of the Local Transport Plan, and consequently attempts to discourage excessive car use. The principles of the Local Transport Plan also benefit cyclists, pedestrians and public transport users and this is reflected in the transport chapter. Policies that consider parking standards attempt to restrict car parking, discouraging car use. Parking standards policies also attempt to prevent development environments dominated by car parking, improving quality of life, consequently parking standards can contribute significantly to sustainability.

Impact Symbols	Policy Impact
+	Beneficial
	Adverse
?	Uncertain
0	Neutral impact / no relationship


Chapter 10: Heritage and conservation chapter appraisal

The principle objective of the Heritage and Conservation chapter is to protect and conserve historic features in the borough, as well as their character and setting. Consequently, the chapter contributes to sustainable development by conserving and improving the built environment. Subsequently, the policies facilitate improvements in the local population's quality of life and also ensure that future generations have the ability to experience and enjoy historic features.

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
HC1 Alterations and extensions to listed buildings and development within their curtilage	Degradation in the stock of listed buildings	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	+	?	0	+
HC2 Demolition of listed buildings	Lack of constraints regarding the demolition of listed buildings	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	+	+	0	0	+
HC3 Enabling development	Loss of fundraising ability	0	0	0	?	?	+	0	0	0	0	?	0	0	0	0	+	+	0	0	+

Impact Symbols	Policy Impact
+	Beneficial
	Adverse
?	Uncertain
0	Neutral impact / no relationship


Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
HC4 Buildings of local architectural and historical significance or protected by an article 4 direction	Unprotected locally important buildings	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	+	+	0	0	+
HC5 Demolition of unlisted buildings structures or features within conservation areas	Character loss in conservation areas	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	+	+	0	0	+
HC6 New development in conservation areas	Inappropriate development in conservation areas	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	+	0	0	+
HC7 New uses for historic buildings	Inappropriate use of historically valuable buildings	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	+	+	?	0	+
HC8 Development effecting parks and gardens of special historic interest	Degradation and loss of historic parks and gardens	0	0	0	+	+	+	0	0	0	0	+	0	0	0	0	+	+	0	0	+

Impact Symbols	Policy Impact
+	Beneficial
	Adverse
?	Uncertain
0	Neutral impact / no relationship

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
		0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	+	0	?	0	+
HC9 Sites and features of archaeological importance	Loss of archaeological remains	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	+	0	?	0	+

Conclusion

The Heritage and Conservation chapter of St Edmundsbury Borough Council's Replacement Local Plan does not contain any definite negative impacts on sustainability. Some policies do have a questionable negative impact on economic development due to the inherent conflict between conservation and the economy. Preserving historic buildings and features can be costly and those responsible for their upkeep frequently do not have the resources to maintain them. To remedy this, policy HC4 enables development activity to support historic buildings and features in exceptional cases, but such development can have a negative impact on open space, landscape and townscape. The Heritage and Conservation chapter takes these factors into consideration and consequently has overall, a positive impact on sustainability.

Impact Symbols	Policy Impact
+	Beneficial
	Adverse
?	Uncertain
0	Neutral impact / no relationship

Chapter 11: Natural Environment

This chapter aims to protect the borough's natural environment through minimising the use of natural resources, as well as conserving St Edmundsbury's landscape, flora and fauna. The chapter makes a positive contribution to sustainable development not only through environmental protection, but also through improving the community's quality of life.

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
NE1 Impact of development on sites of biodiversity and geological importance	Impacts on nature conservation sites are not a material consideration	0	0	+	+	0	0	0	0	0	0	+	0	0	0	0	0	+	0	0	+
NE2 Protected species	Development with an adverse impact on protected species (safeguarded by schedules of the Wildlife and Countryside Act 1981).	0	0	+	0	0	0	0	0	0	?	0	?	0	0	0	+	+	0	0	+
NE3 Protection of the Landscape	Development without consideration of the effect on landscape features such as trees and hedgerows.	0	0	+	+	+	0	0	0	0	+	0	0	0	0	0	+	+	0	0	+

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
NE4 Natural resources	Development without adequate consideration of ground water, surface water and agriculture.	0	0	0	0	0	0	0	+	+	0	0	0	0	+	0	+	+	0	0	+
NE5 Environmental quality	Development emitting unacceptable levels of pollution	0	0	+	+	0	0	0	+	0	+	0	0	0	0	0	+	+	0	0	+
NE6 Safeguarding from hazards	Development that risks public health and safety	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	+	0	0	+


Conclusion


The Natural Environment chapter makes a significant contribution to the well being of the population of St Edmundsbury and the surrounding area, the conservation of the landscape, species, and landscape features contributes to the community's quality of life now and in the future. Policies on pollutants, water quality and conservation, air quality and noise contribute considerably to health and contentment, essential elements of well being and thriving communities. The Natural Environment chapter of the Local Plan also has a significantly positive impact on air quality, biodiversity and landscape.

Chapter 12: Facilities for the Community

The facilities for the community chapter's aim is to ensure that development is adequately served by community facilities and public services. This contributes to the environmental element of sustainable development by reducing communities need to travel to facilities. The social aspect of sustainable development is also accounted for as the chapter considers all groups in society, focusing specifically on minority groups.


Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
FC1 Community buildings	Loss of community buildings, without compensation.	+	+	0	0	?	+	0	0	0	0	?	0	0	0	0	+	+	+	+	+
F2 Premises for people with special needs	Inaccessible facilities for people with special needs.	0	+	0	0	?	0	0	0	0	0	0	0	0	0	0	+	+	0	+	+
FC3 Premises for early years education	Inadequate provision of early year's education premises.	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+
FC4 Utility services	Development without adequate utilities	0	0	?	?	?	0	0	+	0	0	0	0	0	0	0	+	0	0	0	+
FC5 Redundant public service installations	No re-use of redundant public services installations	?	0	0	0	?	0	0	0	0	0	0	+	+	0	0	0	0	?	0	+

Impact Symbols	Policy Impact
	Beneficial
	Adverse
	Uncertain
0	Neutral impact / no relationship

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol	
FC8 Development near high voltage (600v and above) power lines	Unrestricted development near high voltage power lines	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	+	+
FC9 Telecommunications development	Unregulated construction of masts and antennae	0	0	0	+	+	0	0	0	0	0	+	0	0	0	0	0	0	0		0	+
FC10 Renewable energy proposals	Over reliance on fossil energy	0	0	0	?	+	0	+	0	0	+	0	0	0	0	+	+	+	?	+	+	

Conclusion

The quality of life of residents within the borough of St. Edmundsbury is upheld and improved through the policies in the facilities for the community chapter of the Local Plan. The chapter relates positively to the social aspects of sustainability through catering for minorities such as young people and people with special needs. These benefits are integrated with reducing the need to travel and reducing fossil energy consumption, both prominent environmental concerns. The uncertainty impact symbols are used because the reuse/redevelopment of educational premises could cause the development of playing fields, which could be detrimental to the amenity of the locality and the impact of the utility services policy is dependant on which services are provided. Community led renewable energy projects that are inclusive can help to reinforce the community through empowerment, such schemes are good for the environment not only through the reduction of fossil fuel use but also as the people involved in the project can become more environmentally aware and this can be reflected in their actions.

Impact Symbols	Policy Impact
	Beneficial
	Adverse
	Uncertain
0	Neutral impact / no relationship

Chapter 13 Implementation

Development should make the maximum use of the existing infrastructure on development sites; however some development is likely to take place where the existing infrastructure is inadequate or unavailable. The Implementation chapter aims to ensure that the infrastructure necessary to serve developments can be made available on every development site.

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
IM1 Developer contributions	No funding for adequate development infrastructure	0	?	0	0	?	0	0	?	0	0	?	0	0	0	0	+	?	?	0	+

Conclusion

The impact of developer contributions is predominantly dependant on the services that are provided, therefore this analysis is limited. Developer contributions ensure that communities are provided for and so they make a significant contribution to the social aspect of sustainable development.

Impact Symbols	Policy Impact
□	Beneficial
⊗	Adverse
□	Uncertain
0	Neutral impact / no relationship

Chapter 15: Part 2 Site Specific Policies

15.1 Bury St Edmunds

This chapter focuses on providing a framework for the growth of Bury St Edmunds. A vision for Bury St Edmunds as a sub regional centre, providing jobs and services for the surrounding area and meeting housing need in the locality is realised through site specific policies. By applying the sequential approach to development and assessing the greenfield sites put forward in the issues report, (see appendix B), the policies minimise the detrimental impacts of growth.


Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
BSE1 Housing on Brownfield sites	Unspecified availability and capacity of brownfield sites in Bury St Edmunds	+	+	?	+	?	0	0	0	0	0	0	+	+	+	+	+	0	+	0	+
BSE2 Vinefields farm	No strategic allocation of greenfield sites (see appendix B: site appraisals)	+	+	?	X	?	0	0	0	?	0	+	0	0	X	+	+	0	?	0	+

Impact Symbols	Policy Impact
	Beneficial
X	Adverse
	Uncertain
0	Neutral impact / no relationship

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
BSE3 Strategic site- Suffolk Business Park, Moreton Hall, Bury St Edmunds	More freedom and less certainty for developers, and haphazard employment development			0		?	0	0	0	0	0	0	0	0		?	0	+	+	0	
BSE4 General Employment Areas	More freedom and less certainty for developers, and haphazard employment development and growth.	?	?	0	?	0	0	0	0	0	0	0	0	0		?	?	?	+	0	+
BSE5 British Sugar site	Continued contamination on the employment site	0	0	+	0	+	0	0	+	0	0	0	+	+	0	0	+	0	+	0	+

Impact Symbols	Policy Impact
	Beneficial
	Adverse
	Uncertain
0	Neutral impact / no relationship

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
BSE6 Station Hill development area	Continued inadequate use of the area	+	+	0	0	+	0	0	0	0	+	0	+	+	0	+	+	+	+	0	+
BSE7 Town centre development area	Less mixed uses and facilities in the town centre	+	+	0	0	+	0	0	0	0	0	0	+	0	0	+	+	0	+	0	+
BSE8 St Edmundsbury Retail Park	Retail warehousing in inappropriate locations	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+
BSE9 Tayfen Road	Inappropriate use and detrimental impact.	+	+	0	0	+	0	0	0	0	0	0	+	+	0	0	+	0	+	0	+
BSE10 St Andrews Street North	Inadequate provision for bus services in Bury St Edmunds	0	+	0	0	?	0	0	0	0	+	0	0	0	0	+	+	0	+	+	+
BSE11 Park and ride	Congested town centre	0	+	0	0	+	0	0	0	0	+	0	0	0	0	+	+	0	+	+	+
BSE12 New railway station	Less choice of transport	?	+	0	0	+	0	0	0	0	+	0	0	0	0	+	+	0	+	+	+


Impact Symbols	Policy Impact
	Beneficial
	Adverse
	Uncertain
0	Neutral impact / no relationship

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
BSE13 Bury St Edmunds Eastern relief road	Inadequate access to development		0	0	0	0	0	0	0	0	?	0	0	0	0	0	+	+	+	0	+
BSE14 West Suffolk hospital and St. Nicholas hospice	Constrained growth of vital community facilities.	+	?	0		?	0	0	?	?	0	0	0	0	0	0	+	+	+	+	+
BSE15 New school sites	No provision of educational facilities in new development.	+	+	0	?	?	0	0	0	0	0	0	0	0	0	0	+	0	?	+	+
BSE16 West Suffolk College	Prohibited expansion of West Suffolk College		+	0	0	?	+	0	0	0	0	?	0	0	0	0	+	0	+	+	+
BSE17 Western Way	Haphazard development at Western Way	?	?	0	0	+	0	0	0	0	0	0	+	0	0	0	+	+	+	+	+

Impact Symbols	Policy Impact
	Beneficial
	Adverse
	Uncertain
0	Neutral impact / no relationship

Conclusion

Development on greenfield sites to extend Bury St Edmunds is not sustainable and this is reflected in the assessment. The Borough Council must, however, meet housing and employment need, consequently some greenfield development is essential. The greenfield sites allocated in the replacement Local Plan have been subject to rigorous assessments (see Appendix B) and sustainable options have been put forward.

Impact Symbols	Policy Impact
	Beneficial
	Adverse
	Uncertain
0	Neutral impact / no relationship

15.2 Haverhill

This chapter is also based on site specific policies, and provides a strategic framework for the growth of Haverhill. The focus in Haverhill is on creating a self sustaining community, balancing the growth of homes, jobs and services whilst also maintaining Haverhill's active role in the growth of the Cambridge sub region. The aim of the chapter is sustainable as the focus is on creating a self sustaining community, reducing out commuting.

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
HAV1 Housing on Brownfield sites	Unspecified availability and capacity of brownfield sites in Haverhill	+	0	?	+	?	0	0	0	0	0	0	+	+	+	+	0	0	+	0	+
HAV2 Strategic site, north west Haverhill	No strategic allocation of sustainable greenfield sites (see appendix B: site appraisals)	X	0	?	X	0	0	0	0	0	0	0	0	0	X	0	0	0	?	0	X

Impact Symbols	Policy Impact
	Beneficial
X	Adverse
	Uncertain
0	Neutral impact / no relationship

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
HAV3 Strategic employment site, Hanchett End	More freedom and less certainty for developers, and haphazard employment development	+	+	0		0	0	0	0	0	0	0	0	0		0	+	0	+	0	?
HAV4 General employment areas	More freedom and less certainty for developers, and haphazard employment development and growth.	?	0	?		0	0	0	0	0	0	0	0	0	0	0	+	0	?	0	+
HAV5 Town Centre Redevelopment-Haverhill	Unmanaged and uncoordinated growth in the town centre	?	?	0	0	+	0	+	0	0	0	?	+	0	0	0	+	+	+	+	+
HAV6 Former station yard site and adjoining premises	Supermarket in unsuitable location	+	0	0	0	?	0	0	0	0	0	0	+	0	0	0	+	0	+	+	+


Impact Symbols	Policy Impact
	Beneficial
	Adverse
	Uncertain
0	Neutral impact / no relationship

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic development	Equity	Concluding symbol
HAV7 New local centres and facilities	Inadequate provision of leisure and health facilities	+	+	0	0	?	0	0	0	0	0	0	+	0	0	0	+	+	0	+	+
HAV8 Site for retail warehousing in Haverhill	Limited retail provision	+	?	0	0	?	0	0	0	0	0	0	+	0	0	0	+	0	+	+	+
HAV9 Haverhill retail park	A detrimental impact on Haverhill town centre	?	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	+	0	+
HAV10 Haverhill Northern Relief Road	Congestion and environmental damage	⊗	0	0	⊗	0	0	0	0	0	+	0	0	0	0	0	0	0	+	0	?
HAV11 New school sites	No provision of educational facilities in new development.	+	+	0	⊗	0	0	0	0	0	0	0	0	0	0	0	+	0	0	+	+

Impact Symbols	Policy Impact
	Beneficial
⊗	Adverse
	Uncertain
0	Neutral impact / no relationship



Conclusion


The negative aspects of greenfield development are reflected in this assessment, as well as the benefits of allocating greenfield land in Haverhill. For example, the greenfield land allocated for employment use at Hanchett End has a negative impact on the landscape and on agriculture, but as the site is predominantly for high quality B1 industry, which there is a need for in Haverhill, residents may be discouraged from commuting to Cambridge. Hanchett End is the best location for these allocations due to its proximity to Cambridge, as well as site assessment factors (see appendix B).

Impact Symbols	Policy Impact
	Beneficial
	Adverse
	Uncertain
0	Neutral impact / no relationship

15.3 Rural Allocations

The focus of this chapter is on balancing the protection of the countryside with meeting the needs of rural communities for homes and jobs. The housing development strategy is based on St Edmundsbury Borough Council's interpretation of Suffolk Structure Plan policy CS3 (e), which ensures that residential development is sustainable in rural settlements. Policy CS3 (e) suggests that settlements with education facilities, public transport, a convenience goods shop, community facilities and employment opportunities can accommodate housing growth. The Borough Council considers that Barrow, Clare, Ixworth, Kedington and Stanton meet these criteria through vigorous assessments. In some cases General Employment Areas have been allocated to improve employment opportunities. The principles behind the Rural Areas chapter are sustainable as sustainability is a key focus in the site allocation process.

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic growth	Equity	Concluding symbol
RA1 Brownfield allocations	Unspecified availability and capacity of brownfield sites in rural areas	+	+	?	+	?	0	0	0	0	0	0	+	+	+	0	+	0	+	0	+
RA2 Strategic Greenfield allocations	No greenfield developments in sustainable settlements	+	+	?		0	0	0	0	0	0	0	0	0		0	+	0	+	0	+

Impact Symbols	Policy Impact
	Beneficial
	Adverse
	Uncertain
0	Neutral impact / no relationship

Policy	Alternative scenario	Transport: Trips	Transport: Modes	Biodiversity	Landscape	Townscape	Cultural heritage	Minerals conservation	Water conservation and quality	Flood risk	Air quality	Open space	Brownfield land	Land pollution	Agriculture and forestry	Energy conservation	Thriving communities	Well-being	Economic growth	Equity	Concluding symbol
RA3 General employment areas	More freedom and less certainty for developers, and haphazard employment development and growth.	?	?	?	0	0	0	0	0	0	0	0	+	0	?	0	+	0	+	0	+
RA4 New open space provision	Inadequate provision of recreational open space in Kedington and Ixworth	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	+	+	0	+	+

Impact Symbols	Policy Impact
	Beneficial
0	Adverse
	Uncertain
0	Neutral impact / no relationship

Conclusion

The structure plan methodology used in the selection of rural villages is sustainable and this is reflected in the assessment. By selecting villages with adequate services for housing and employment growth the Borough Council ensures that the population has access to a range and facilities and services by sustainable means, this is both equitable and good for the environment. Both brownfield and greenfield development in rural areas can have a negative impact on the landscape. Brownfield development affects the surrounding landscape and greenfield development affects the surrounding landscape as well as the development site.

Chapter 16: Conclusion

16.1 The appraisal process

The Sustainability Appraisal evolved with the Local Plan with chapters initially assessed and then re-assessed following modifications. Appraising the plan became an integral part of the preparation of the Draft Local Plan, the Sustainability Appraisal group commented on the sustainability of each chapter and changes were made accordingly. As a result of the process no recommendations are made in the Appraisal. The Draft Replacement Local Plan Sustainability Appraisal process reveals that the intentions of the Plan are sustainable, damaging growth requirements are balanced with the needs of the community as well as environmental and historical conservation mitigation measures.

16.2 The sustainability of the Draft Replacement Local Plan

Meeting the needs of the environment, the economy and the community is a difficult task when creating land-use policy. The Borough Council has attempted to include mitigation measures against any potentially damaging policy consequences. The current rate of housing development in Suffolk is not sustainable but the planning function must meet housing need. Policies promoting sustainable housing provision through redevelopment attempt to create a balance in this scenario.

A key objective for sustainability in the Draft Local Plan is the restriction placed on unnecessary development in the countryside. The sequential approach to development enforces this ideal, however environmental problems must be given consideration when promoting the development of brownfield land. Increasing pressures from development, using brownfield land and increasing densities, could threaten biodiversity. The policies in the Draft Replacement Local Plan attempt to create a balance between habitat conservation and development pressures.

A number of negative impacts on agriculture have also been recorded, and this is due to the scale of development pressure in the borough. According to the sequential approach low grade agricultural land can represent the most sustainable greenfield development site. Agricultural land is frequently less species rich and biodiverse than other habitats in the countryside. However, the draft Local Plan is inclusive and avoiding the higher grade agricultural land minimises the impact on this resource.

Promoting affordable housing, housing for key workers, accessible public transport and accessible leisure facilities could potentially benefit all of the community. The Draft Replacement Local Plan also places essential restrictions on the development market, this may be restraining for the development industry in the short term, but it is beneficial for the Borough in the long term.

Complete sustainability is difficult to achieve, particularly in relation to development and meeting significant housing and employment need. The Replacement Local Plan places constraints on development, and attempts to balance social needs with maintaining and improving the economy and the environment. Consequently the plan is a significant step towards achieving sustainability in the borough.

Appendix A: Stock Criteria

Adapted from 'A methodology for the sustainability of development plans' (Suffolk Local Planning Authorities, 2001).

Transport: Trips

Concerned with the number and length of trips made and accessibility between land uses.

Each policy is evaluated as to whether implementation will create a situation where longer or shorter trips are necessary or where segregation of land use is increased or decreased.

Does the policy reduce the need to travel?
Does the policy seek to minimise trip generation?
Does the policy facilitate combined trips?

For the purpose of this assessment it is assumed to be an indirect consequence that people travel more when facilities are provided in their locality. Trips are calculated through the actual distance.

Transport: Modes

Concerned with the modal split of travel such as that made by car, foot, bike, bus and train and with the efficient distribution of goods for business.

Each policy is evaluated as to whether implementation will reduce or increase car reliance or whether it improves personal choice for alternative means of travel by public transport, cycling or walking.

Does the policy increase opportunities for using alternatives to car transport?
Does the policy adversely affect access to transport networks for business?

Biodiversity

Concerned with habitats and species richness. This includes designated sites (statutory and non-statutory) as well as non designated sites, species with statutory protection and wider ecological considerations.

Each policy is evaluated as to whether implementation will damage or protect existing habitats, enhance wildlife potential, or create new habitats and general wildlife corridors.

Landscape

Concerned with the appearance of the countryside.

Designated areas (E.g. AONBs and SLAs) are of particular significance but the landscape quality of the development plan area as a whole should be considered 'for its own sake'.

Each policy should be evaluated as to whether implementation will protect, enhance, create or damage landscapes.

Does the policy safeguard areas of value or provide for landscape improvement?

Townscape

Concerned with the character and visual appearance of settlements; both towns and villages.

Each policy should be evaluated as to whether implementation will improve the character and visual environment for residents and visitors.

Does the policy provide for the enhancement or protection of the existing townscape or does it provide for development that is likely to detract from the existing townscape?

Cultural Heritage

Concerned with the built heritage of the Development Plan area; principally listed buildings, conservation areas and archaeological sites.

Each policy should be evaluated as to whether implementation will protect or enhance listed buildings, conservation areas and archaeological sites.

Does the policy ensure that the cultural heritage of the Development Plan area, both qualitatively and quantitatively, is protected?

Minerals Conservation

Concerned with the consumption of minerals, safeguarding of district resources and the reuse/recycling of materials.

Each policy should be evaluated as to whether implementation will have a deleterious effect on minerals conservation.

Does the policy result in a sterilisation of mineral resources or does it generate demand for mineral, and other renewable resources?

Water Conservation and Quality

Concerned with river and groundwater levels and the purity of water supply.

Each policy should be evaluated as to whether implementation will have an adverse effect on water conservation and quality.

Does the policy safeguard the quality of water resources available?

Does it generate additional pressure on the resources available?

Flood Risk

Will the policy impact on a flood plain or a river catchment? If so does the policy seek to mitigate against an adverse impact? Does the policy seek to bring about improvements?

Has the policy/proposal taken fully into account the flood plain considerations where relevant?

Is the policy either within or adjacent to a fluvial flood plain? If so what is the impact on the proposal itself, and/or the wider flood plain environment?

Air Quality

Concerned with levels of all air borne pollutants of potential significance, but particularly carbon dioxide, and changes in atmospheric balance.

Each policy is evaluated as to whether implementation will exacerbate or improve local air pollution problems. Within this criteria the provision, and extent, of any new tree cover is considered as additional planting has a beneficial effect on air quality.

Will the policy result in the deterioration of air quality?
Are there significant opportunities for increased tree cover?

Open Space

Concerned with the quality of, and accessibility to, open spaces within both urban and rural areas.

Open space may be of recreational and/or aesthetic value to the Development Plan area.

Each policy should be evaluated as to whether implementation enhances public access or whether the quality and quantity of open space is adversely affected.

Does the policy provide for the protection of open spaces within urban areas?
Will the policy enhance the extent of public access?

Brownfield land

Concerned with land dereliction and the opportunities for land reclamation and the re-use of redundant sites.

Each policy should be evaluated as to whether it encourages the use of Brownfield land.

Does the policy provide opportunities for, or inhibit the reclamation and re-use of derelict land and redundant / underused sites?

Land Pollution

Concerned with the effects on the contamination, erosion and pollution of land.

Each policy should be evaluated as to whether it is likely to cause or reduce the pollution, contamination or erosion of land.

Will the policy have an impact on land pollution/erosion?

Agriculture and Forestry

Concerned with the quality of land available for agriculture and forestry.

Each policy is evaluated as to whether implementation will lead to loss of good quality agricultural land.

Does the policy safeguard the best and most versatile agricultural land?

Energy Conservation

Concerned with energy use in buildings, design and layouts and the potential for the exploitation of renewable sources of power including wind, wave, solar and biomass.

Each policy should be evaluated as to whether implementation will yield benefits of energy efficient siting and design, and whether the policy provides opportunities for increasing the use of renewable energy.

Does the policy provide opportunities for increased energy efficiency within the built environment?

Does the policy restrict opportunities for the development of renewable sources of power?

Thriving communities

Concerned with maintaining the vitality of existing communities, whether they be urban, suburban or rural.

Each policy should be evaluated as to whether it maintains, enhances or restricts the key elements of particular communities in the development plan area.

Does the policy facilitate or restrict the types and levels of development that maintain the viability of the existing communities?

Will the policy lead to settlement isolation?

Key land use elements of a thriving community include access to a primary school, access to community facilities (community/village hall, recreation ground) and access to shopping facilities (convenience goods shop, post office).

Well-being

Concerned with the quality of life, as perceived through sight, sound, smell and touch. It also includes perception of security and impact on health.

Although there is an overlap with some other criteria (particularly landscape and townscape) this is an aspect covering the various facets of the local environment, such as noise, smell and light pollution.

Each policy should be evaluated as to whether implementation will retain, improve or exacerbate local environmental conditions.

Will implementation of the policy lead to an increase in noise, light or odour problems, which would affect environmental quality?

Will the policy improve or worsen perceptions of safety and/or opportunities for improvement?

Economic development

Economic development contrasts with economic growth. Economic growth is dependant on the increased consumption of finite natural resources and is consequently unsustainable. Economic development can lead to increases in employment and activity without increasing consumption of finite resources. Economic development is supported in this appraisal.

Economic development is concerned with the impacts on employment diversity and locally important industries.

Each policy should be evaluated as to whether it would promote or inhibit investment, economic and employment investment.

The policy should be assessed as to whether employment development is supported and not job creation.

Will the policy / proposal seek to encourage diversification of the economy, give support for clusters and / or, attract inward investment?

Will the policy adversely affect the availability of sites for industry / commerce?

Will the policy provide opportunities for investment?

Will the policy support existing town centres?

Equity

Concerned with ensuring that development plan policies do not discriminate against individuals or groups within society.

Each policy should be evaluated as to whether it discriminates against any groups or individuals.

Does the policy/proposal cater for the identified local requirements? For example on new housing proposals does the range in size and tenure of housing proposed reflect what the local housing requirements are, or do these seek to exclude / discriminate against sections of the local community?

Primary criteria for site sustainability assessment				
Site Name and Address:				
Objective (From the UK Sustainable development white paper)	Reason for criteria (With reference to the community plan)	Primary criteria question	Required answer	Site characteristics (Where criteria is failed please indicate with a * where mitigating measures will be taken)
A. Social progress for all.	To ensure good accessibility, encourage sustainable transport and provide an integrated transport system.	1. Is the site accessible or capable of being served by a public transport network, such as railways?	Yes	
		2. Will a regular existing/proposed bus route and/or rail route serve the development?	Yes	
		3. Is the site accessible by sustainable transport to a range of facilities and services, including retail, education and leisure?	Yes	
		4. Does the settlement contain shopping facilities?	Yes	
		5. Does the settlement contain a primary school?	Yes	
		6. Does the settlement contain a middle school?	Yes	
		7. Does the settlement contain existing community facilities available to and accessible from the new development?	Yes	
		8. Is the site situated in an area of housing need?	Yes	
		9. Will the site be isolated from the rest of the settlement (such as separation by a primary road)?	Yes	
		10. Will the site's development result in any of the following? 1 - coalescence of settlements visually or physically 2 - Ribbon development	No	

	<p>3 - Unchecked urban expansion 4 - Physical intrusion into the countryside 5 - Unsuitable living environment</p>		
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Appendix B: Site sustainability assessments

B. Protection of the natural and built environment.	Protecting rural land and habitats; enhancing built and urban environments promoting biodiversity.	11. Is the site designated as open space or as an important open area?	No	
		12. Is the site within a special landscape area?	No	
		13. Will the development effect areas of historical significance? 1 - Scheduled ancient monuments or archaeological sites of importance 2 - Listed buildings 3 - Historical setting or feature	No	
		14. Will the development of the site impact upon a wildlife site of international / national importance or other sites of ecological value?	No	
		15. Will the development of the site have a significant impact on the landscape through the loss of trees and woodland?	No	

<p>C. Prudent use of natural resources.</p>	<p>Reducing the use of natural resources and energy consumption; air, land and water issues.</p>	<p>16. How is the site classified in terms of the sequential approach? 1 - Brownfield within a main urban area 2 - Brownfield adjoining a main urban area 3 - Greenfield within a main urban area 4 - Extension to a main urban area 5 - Infilling within a CS3 (e) settlement 6 - Extension to a CS3 (e) settlement 7 - Infilling within other villages 8 - Extension to other villages 9 - Brownfield rural 10 - Greenfield rural</p>	<p>1,2,3,4,5,6</p>	
		<p>17. Is the site on high grade agricultural land (grade 1)?</p>	<p>No</p>	
		<p>18. Will the sites development result in the loss / sterilisation of mineral reserves or potential resources?</p>	<p>No</p>	
		<p>19. Are there any known sources of contamination on the site?</p>	<p>No</p>	
		<p>20. Does the site suffer from subsidence?</p>	<p>No</p>	
		<p>21. Are there adequate water resources available to serve the new development?</p>	<p>Yes</p>	
		<p>22. Will the development of the site affect a protected aquifer as defined by the Environment Agency?</p>	<p>No</p>	
		<p>23. Is the site in an area where there is a serious risk of river flooding?</p>	<p>No</p>	
		<p>24. Will the site's development affect the flow / storage of water on or downstream of the site resulting in surface water flooding, placing people and property at risk?</p>	<p>No</p>	

D. Maintain stable levels of economic growth	To build economic activity on local strengths.	25. Does the settlement/parish contain a general employment area?	Yes	
		26. Is the site located within an area of economic interest / growth?	Yes	
			Failing Criteria:	

Results of the site assessments for the sites allocated in the Issues Report (February 2000)

Land east of Moreton hall

Location	Description	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	Failing criteria
Bury St Edmunds	East of Morton Hall	Y	Y	Y	Y	Y	Y	Y	Y	N	1,4	N	N	N	N	N	4	N	N	N	N	Y	Y	N	N	Y	Y	10, 22

Land south east of Rougham Road

Location	Description	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	Failing criteria
Bury St Edmunds	SW of Rushbrook Lane	Y	N	N	Y	Y	Y	N	Y	Y	4	N	N	N	N	N	4	N	N	N	N	Y	Y	Y	N	Y	Y	2,3,7,9,10,22,23
Bury St Edmunds	Rushbrook Lane	Y	N	N	Y	Y	Y	N	Y	Y	4	N	N	N	N	N	4	N	N	N	N	Y	Y	N	N	Y	Y	2,3,7,9,10,22
Bury St Edmunds	NE of Rushbrook Lane	Y	Y	Y	Y	Y	Y	Y	Y	N	1,4	N	N	N	N	Y	4	N	N	N	N	Y	Y	N	N	Y	Y	10,15,22

Land off Newmarket Road

Location	Description	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	Failing criteria
Bury St Edmunds	West of Westley Estate	Y	Y	Y	Y	Y	Y	Y	Y	N	1	N	N	N	N	N	4	N	N	N	N	Y	Y	N	N	Y	Y	10,22

Land to the north west of the Howard and Mildenhall estates

Location	Description	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	Failing criteria	
		1	2	3	4	5	6	7	8	9	0	1	1	1	14	1	1	1	1	1	2	2	2	2	2	2	2	2	Failing criteria

Bury St Edmunds	North of Golf Course	Y	Y	Y	Y	Y	Y	Y	Y	N	4	N	N	N	N	4	N	N	N	N	Y	Y	N	N	Y	Y	10,22	
Bury St Edmunds	Adj. to Bury St Edmunds Golf Course	Y	Y	Y	Y	Y	Y	Y	Y	N	N	N	N	N	N	9	N	N	N	N	Y	Y	N	N	Y	Y	16,22	
Bury St Edmunds	Bury St. Edmunds Golf Course	Y	Y	Y	Y	Y	Y	Y	Y	N	N	Y	N	N	LWS	N	9	N	N	N	N	Y	Y	N	N	Y	Y	11,14,16,22

Land to the north of Compiegne way

Location	Description	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	Failing criteria
Bury St Edmunds	North of Railway	Y	Y	Y	Y	Y	Y	Y	Y	N	1,4	N	N	N	N	Y	4	N	N	N	N	Y	Y	N	N	Y	Y	10,15,22

Land north east of Chalkstone Way

Location	Description	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	Failing criteria
Haverhill	North of Chalkstone Way	Y	Y	Y	Y	Y	Y	Y	Y	N	4	N	N	N	N	Y	4	N	N	N	N	Y	N	N	N	Y	Y	10,15

Land in North Haverhill/Hales Barn

Location	Description	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	Failing criteria
Haverhill	South of Norney	Y	Y	Y	Y	Y	Y	Y	Y	N	N	N	N	N	N	N	4	N	N	N	N	Y	Y	N	N	Y	Y	22

