

St Edmundsbury Borough
Council

Local Plan

Bury St Edmunds Vision 2031
Submission Draft Document

Sustainability Appraisal Report

Main Report

June 2013

St Edmundsbury Borough Council Local Plan

Bury St Edmunds Vision 2031 Submission Draft Document

Sustainability Appraisal Report Main Report

June 2013

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List of Abbreviations

| Term | Meaning |
|-----------------|---|
| AMR | Annual Monitoring Report |
| AQMA | Air Quality Management Area |
| BAP | Biodiversity Action Plan |
| CIL | Community Infrastructure Levy |
| CO ₂ | Carbon Dioxide |
| CWS | County Wildlife Site |
| DCLG | Department of Communities and Local Government |
| DPD | Development Plan Document |
| HRA | Habitats Regulations Assessment |
| LDD | Local Development Document |
| LNR | Local Nature Reserve |
| LSOA | Lower Super Output Area |
| NDO | Neighbourhood Development Orders |
| NNR | National Nature Reserve |
| NP | Neighbourhood Plans |
| NPPF | National Planning Policy Framework |
| ODPM | Office of the Deputy Prime Minister |
| ONS | Office of National Statistics |
| PDL | Previously Developed Land |
| PPPs | Plans, Programmes and Policies |
| PPS | Planning Policy Statement |
| RIGS | Regionally Important Geological/Geomorphological Site |
| SA | Sustainability Appraisal |
| SAC | Special Areas of Conservation |
| SM | Scheduled Monument |
| SEA | Strategic Environmental Assessment |
| SEBC | St Edmundsbury Borough Council |
| SPA | Special Protection Areas |
| SPD | Supplementary Planning Document |
| SSAG | Suffolk Sustainability Appraisal Group |
| SSSI | Site of Special Scientific Interest |

Non-Technical Summary

Overview of the Bury St Edmunds Vision 2031 Submission Draft document

St Edmundsbury Borough Council is currently preparing the Local Plan (formerly known as Local Development Framework) which will set out the policies and principles for the development and use of land up to 2031. The Local Plan is made up of a collection of Development Plan Documents (DPDs), one of which is the Bury St Edmunds Vision 2031 Submission Draft document. After adoption, the Local Plan will supersede the Replacement St Edmundsbury Borough Local Plan 2016 which was adopted in 2006. The contents of the Bury St Edmunds Vision 2031 Submission Draft document flows from and complements the policies in the adopted Core Strategy.

The Council launched work on Bury St Edmunds Vision 2031 in 2011 by undertaking a consultation on the Issues needed to be tackled, either at present or having regard to what the town will face over the next 20 years. People's visions for what the town should be like in 2031 were also sought. Since work commenced on the preparation of the Local Plan a number of landowners and developers have put forward prospective development sites.

The Bury St Edmunds Vision 2031 Submission Draft document is a comprehensive plan to guide the overall direction of future service provision and management of growth in the town for the next twenty years and beyond. It plans for all service provision into a single holistic vision, so that service providers work together to achieve agreed aims and reduce duplication of effort. . It includes generic, topic specific and site specific policies.

In particular, the Vision document contains policies which set out the presumption in favour of sustainable development, define settlement boundaries, support exploring district heating network opportunities and Community Infrastructure Levy and Allowable Solutions, the provision of educational establishments, green infrastructure and allotments.

The Vision document also allocates development sites for different uses in and around Bury St Edmunds and sets out the related site specific policies. This covers such uses as residential, employment, education, retail, transport and mixed-use development.

Why do we need to produce a Sustainability Appraisal and what is the purpose of one?

The Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment (SEA) Directive 2001/42/EC require the production of a Sustainability Appraisal (SA) to accompany each DPD included within the LDF (now Local Plan). The updated Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012 still include the requirement for SA for LDDs, which cover DPDs. The purpose of SA is to promote sustainable development through better integration of sustainability considerations in the preparation and adoption of plans. The Regulations stipulate that SA of LDDs should meet the requirements of the SEA Directive.

The Department for Communities and Local Government (DCLG) Plan Making Manual¹ states that "The sustainability appraisal is integral to the plan making process. It should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process".

The National Planning Policy Framework (NPPF) outlines the requirement for Sustainability Appraisal as part of the plan preparation process: 'A sustainability appraisal which meets the requirements of the European

¹ DCLG (2008) Plan Making Manual

Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.'

How has the Bury St Edmunds Vision 2031 Submission Draft document been appraised?

The SA has appraised the document's objectives, each proposed site and the policy allocating it and also proposed generic policies. The suitability of an objective, site or policy in terms of its sustainability was determined through 22 criteria (the SA framework), which were developed to incorporate the broad areas of sustainability which development plans may affect; either positively or negatively.

The SA framework is a key tool in completing the SA as it allows the assessment of the effects arising from the proposals in key areas in a systematic way. The SA Framework is based on the Framework prepared originally by the Suffolk Sustainability Appraisal Group (SSAG) for all Suffolk authorities and then further developed for the Core Strategy. This Framework was used to appraise the Bury St Edmunds Vision 2031 document. Its objectives are shown below:

Social

1. To improve the health of the population overall and reduce health inequalities
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 use water and mineral resources efficiently, and to re-use and recycle where possible
12. To reduce waste
13. To reduce the effects of traffic on the environment
14. To reduce contributions to climate change
15. To reduce vulnerability to climatic events
16. To conserve and enhance biodiversity and geodiversity
17. To conserve and where appropriate enhance areas of historical and archaeological importance
18. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes

Economic

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

Habitats Regulations Assessment

Habitats Regulation Assessment (HRA) is required by Regulation 61 the Conservation of Habitats and Species Regulations 2010 (as amended) (the Habitat Regulations) for all plans and projects which may have likely significant effects on a European site and are not directly connected with or necessary to the management of the European site. These regulations are often abbreviated to the 'Habitats Regulations' and require an assessment to be undertaken of the effects of the Bury St Edmunds Vision 2031 document on European sites. There are three European sites relating to nature conservation within the district: Breckland Special Protection Areas (SPA), Brecklands Special Areas of Conservation (SAC) and Waveney and Little Ouse Valley Fens SAC. There are also seven European sites within a 20 km radius of the boundary of St Edmundsbury which were considered: Redgrave and South Lopham Fens SAC, Rex Graham Reserve SAC, Norfolk Valley Fens SAC, Devil's Dyke SAC, Fenland SAC, Chippenham Fen Ramsar site and Wicken Fen Ramsar site.

A number of recommendations were set out in the HRA Screening of Draft Bury St Edmunds Vision 2031 Preferred Options (February 2012) to ensure that there would be no likely significant effect upon any European site as a result of the Plan implementation. These recommendations were all taken on board in the Bury St Edmunds Vision 2031 Submission Draft document. The HRA Screening concluded that the Bury St Edmunds Vision 2031 Submission Draft document would have no likely significant effect on any European site.

The HRA and SA requirements and process are separate, but the two processes have been run in parallel for the Bury St Edmunds Vision 2031 document.

What are the alternatives to what is being proposed?

The St Edmundsbury Core Strategy and Bury St Edmunds Vision document identify five major areas of growth:

- North-west Bury St Edmunds;
- Moreton Hall;
- West;
- North-east Bury St Edmunds; and
- South-east Bury St Edmunds.

The Bury St Edmunds Vision draft document contains options for the concepts of these areas. The options have been subject to public consultation and a comparative appraisal as part of the development of the Bury St Edmunds Vision 2031. The appraisal aimed to identify the most sustainable growth option for each area. This informed the identification of preferred options for each area by SEBC and the development of the relevant policies in the Bury St Edmunds Vision 2031 Preferred Options document and their subsequent refinement in the Submission Draft document. More site alternatives were also considered for other parts of the town. The justification for not taking some of them forward is presenting in the SA Appendix G..

What are the outcomes of this Sustainability Appraisal?

Overall, the Bury St Edmunds Vision 2031 Submission Draft document is likely to have significant positive effects on most social and economic objectives, with significant positive effects predicted in relation to improving opportunities for access to education, employment, recreation, health, community services and cultural opportunities for all sections of the community; protecting or enhancing the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings; enhancing the viability and vitality of the town centre of Bury St Edmunds; and making the best use of previously developed land and existing buildings.

However, the potential for significant negative effects is predicted against water consumption levels and the quality of water resources; flood risk; the generation and management of waste; sustainable transport and traffic congestion; noise pollution; the quality of countryside; greenhouse gas emission levels; air quality targets; and the impact of development on the local and national ecological designations. The HRA

Screening demonstrated that individual site allocations and policies within the Bury St Edmunds Vision 2031 Submission Draft document are not likely to have a significant effect on any European site either alone or in combination.

The findings of this assessment indicate that the sustainability performance of the Bury St Edmunds 2031 Submission Draft document has improved, as the Council has taken account of the mitigation measures and recommendations set out in the previous 2012 SA report.

How can I comment on this Sustainability Appraisal?

There is an eight week public consultation on the Bury St Edmunds Vision 2031 Submission Draft document and the SA report, starting on the 18th June and ending on the 9th of August 2013 during which comments can be received. Representations will not be considered if they are received after the closing date.

It would be helpful if you could respond using the online response form via the council's online public consultation system at <http://www.stedmundsbury.gov.uk/ldf>. The response form can also be downloaded from the web-site above. If you do not have access to a computer, copies of the response form can be requested by using the contact details below. Individual letters and emails will also be accepted.

When making a representation it is important to be specific as possible setting out the issues the representation refers to and what changes you consider should be made. Please be aware that any representations made on this document will be available for everyone to view, regardless of whether they are submitted by post or on-line.

Where there are groups who share a common view on an issue in the document, if possible that group should send a single representation indicating how many people it is representing and how the representation has been authorised.

All representations must be received by no later than 5.00pm on the 9th August 2013.

If it is not possible to submit representations to us on-line letters/forms/email may be sent to us using the details below:

Planning Policy
St Edmundsbury Borough Council
West Suffolk House
Western Way
Bury St Edmunds
IP33 3YU
Tel: 01284 757368
Email: LDF@stedsbc.gov.uk

You may also hand in forms/letters at the following offices:

West Suffolk House, Western Way, Bury St Edmunds
Council Offices, Lower Downs Slade, Haverhill

1. Introduction

Background

- 1.1 Local Plans are to be prepared by Local Planning Authorities under the Planning and Compulsory Purchase Act 2004. Local Plans comprise a portfolio of documents known as Local Development Documents (LDDs); statutory LDDs are known as Development Plan Documents (DPDs).
- 1.2 The St Edmundsbury Local Plan comprises five DPDs that set out the policies and proposals for development and use of land. The main documents to be produced are:
- Core Strategy – Adopted in December 2010, this provides the vision, objectives and key policies for the future development of St Edmundsbury.
 - Development Management Policies – This document is being prepared in partnership with Forest Heath District Council and the Submission Draft document was published for consultation on 19 October 2012. It contains detailed policies against which planning applications will be determined.
 - Rural Vision 2031 – This is being prepared to provide a vision and planning framework for the rural areas of St Edmundsbury up to 2031.
 - Bury St Edmunds Vision 2031 – This is being prepared to set out both the Council's vision for the future of Bury St Edmunds and the statutory planning policy for the town. The document also identifies and protects land to meet the future needs of Bury St Edmunds.
 - Haverhill Area Vision 2031 – This is being prepared to set out both the Council's vision for the future of Haverhill and the statutory planning policy for the town. The document also identifies and protects land to meet the future needs of Haverhill.
- 1.3 This document is the Sustainability Appraisal (SA) for St Edmundsbury Borough Council's Bury St Edmunds Vision 2031 Submission Draft document. The Bury St Edmunds Vision 2031 Submission Draft document presents the second formal opportunity for comment on the Bury St Edmunds Vision 2031. The proposals presented in this draft consultation document are a result of technical studies, work with local communities and other stakeholders, and responses received to the 2012 consultation on the Preferred Options Bury St Edmunds Vision 2031 document.
- 1.4 The SA builds on previous sustainability work undertaken for the earlier version of the Bury St Edmunds Vision 2031. The SA incorporates the requirements of the Strategic Environmental Assessment (SEA) Directive and has been undertaken in line with the DCLG Plan Making Manual (i.e. its section 'Sustainability Appraisal' replacing the 2005 Office of the Deputy Prime Minister (ODPM) guidance 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents').
- 1.5 The SA assesses the environmental, social and economic performance of the Bury St Edmunds Vision 2031 Submission Draft document against a set of sustainability objectives. In order to provide consistency, the SA objectives match those employed in the assessment of the Core Strategy Submission DPD.

Objectives and Evolution

- 1.6 The Council launched work on Bury St Edmunds Vision 2031 in 2011 by undertaking a consultation on the Issues that needed to be tackled, either at present or having regard to what the town will face over the next 20 years. People's visions for what the town should be like in 2031 were also sought.
- 1.7 The main purpose of the Bury St Edmunds Vision 2031 document is to allocate land for a range of uses to support the objectives and the spatial vision of the adopted Core Strategy. The document sets out the land use planning vision for the town up to 2031, the allocated sites and policies to

guide development in the area. The Bury St Edmunds Vision 2031 objectives are outlined in section 4 of this report.

The Bury St Edmunds Vision 2031 document is at its second stage of public consultation. It seeks to test the soundness and legal compliance of the Bury St Edmunds Vision 2031 Submission Draft document before its submission to the Planning Inspectorate for an independent examination. This document updates and supersedes the 2012 Draft Bury St Edmunds Vision 2031 Preferred Options consultation document. It has been prepared taking on board consultation comments received, findings of technical studies and the SA recommendation set out for the Preferred Options consultation document. A record of the changes made to the Bury St Edmunds Vision 2031 Submission Draft policies as a result of SA recommendations on the Preferred Options draft policies is included in Appendix J.

Sustainability Appraisal Requirements

- 1.8 Under the Planning and Compulsory Purchase Act 2004 and the updated Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012, all DPDs are required to be accompanied by an SA. An SA should promote sustainable development through better integration of sustainability considerations in the preparation and adoption of plans. The Regulations specify that the SA of DPDs should meet the requirements of the SEA Directive.
- 1.9 The NPPF also includes the requirement for SA as part of the plan preparation process:
- 'A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.'*
- 1.10 The DCLG Plan Making Manual² states that *'The sustainability appraisal is integral to the plan making process. It should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process'*.
- 1.11 SA thus helps planning authorities to fulfil the objective of contributing to the achievement of sustainable development in preparing their plans.
- 1.12 There are many definitions of sustainable development. However, the most commonly used and widely accepted is the one adopted by the World Commission of Environment and Development in 1987:
- 'Development which meets the needs of the present without compromising the ability of future generations to meet their own needs.'*
- 1.13 The UK Government's Sustainable Development Strategy 'Securing the Future', published in March 2005, outlines a set of shared UK principles which will be used to achieve the goal of sustainable development. The guiding principles have been agreed by the UK government, Scottish Executive, Welsh Assembly Government and the Northern Ireland Administration. They bring together and build on the various previously existing UK principles to set out an overarching approach. The five guiding principles will form the basis for policy in the UK. For a policy to be sustainable, it must respect all five of these principles in order to integrate and deliver simultaneously sustainable development:
- Living within environmental limits – respecting the limits of the planet's environment, resources and biodiversity to improve our environment and ensure that the natural resources needed for life are unimpaired and remain so for future generations;
 - Ensuring a Strong, Healthy and Just Society – meeting the diverse needs of all people in existing and future communities, promoting personal wellbeing, social cohesion and inclusion, and creating equal opportunity for all;

² DCLG (2008) Plan Making Manual

- Achieving a Sustainable Economy – Building a strong, stable and sustainable economy which provides prosperity and opportunities for all, and in which environmental and social costs fall on those who impose them (polluter pays); and efficient resource use incentivised;
- Promoting Good Governance – Actively promoting effective, participative systems of governance in all levels of society – engaging people’s creativity, energy and diversity;
- Using Sound Science Responsibly – Ensuring policy is developed and implemented on the basis of strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle) as well as public attitudes and values.

1.14 In 2011 the Government published its vision for sustainable development ‘Mainstreaming Sustainable Development’. It builds on the principles that underpinned the UK 2005 Sustainable Development Strategy. It commits to the transition to a green economy, tackling climate change, protecting and enhancing the natural environment, ensuring fairness and improving wellbeing, empowering communities and working on sustainability issues within both the national and international context.

1.15 St Edmundsbury Borough Council is committed to sustainable development, placing the ideologies which underpin it at the centre of its activities. Sustainable development in St Edmundsbury is defined as that which balances the needs of a growing economy with protecting the built and natural environment.

Strategic Environmental Assessment requirements

1.16 The EU Directive 2001/42/EC on the assessment of effects of certain plans and programmes on the environment (the SEA Directive) was adopted in the UK in July 2004 under the Environmental Assessment of Plans and Programmes Regulations 2004. The Local Plan is prepared for the purposes of town and country planning/land use and is likely to have significant effects on the environment and is therefore subject to environmental assessment under the SEA Directive.

1.17 The incorporation of the SEA into the SA ensures that potential significant environmental effects arising from the plan document are identified, assessed, mitigated and communicated to plan makers. Once a plan document is implemented any significant effects are required to be monitored.

1.18 The overarching objective of the SEA Directive is:

‘To provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans... with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans... which are likely to have significant effects on the environment.’ (Article 1)

1.19 The SEA Directive and the SEA Regulations require that this appraisal will consider the following topic areas and inter-relationship between them:

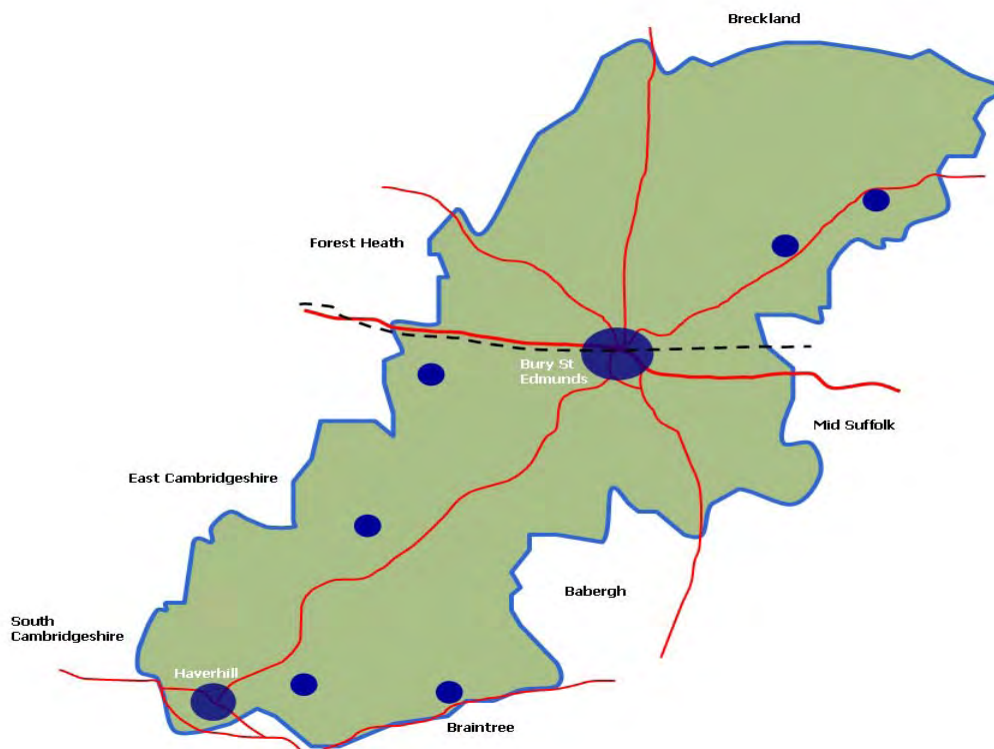
- Biodiversity;
- Population;
- Human health;
- Flora and Fauna;
- Soil;
- Water;
- Air;
- Climatic Factors;
- Material assets;

- Cultural heritage, including archaeological and built heritage; and
- Landscape.

Geographical Scope

- 1.20 The Borough of St Edmundsbury is located in western Suffolk. It has borders with Norfolk to the north, Mid Suffolk and Babergh Districts to the east, Essex to the south and Cambridgeshire and Forest Heath District to the west. While administratively St Edmundsbury's links are with Suffolk County Council, increasingly St Edmundsbury is playing a stronger role in the sub-region of Cambridge because of their common economic and social needs.
- 1.21 The borough has two main towns: Bury St Edmunds in the centre and Haverhill to the south. The remainder of the borough is rural with some large villages such as Stanton, Ixworth, Barrow, Clare and Kedington and many small villages and settlements.
- 1.22 Bury St Edmunds is the administrative centre for the Council.
- 1.23 This SA is primarily concerned with effects arising from implementation of the Bury St Edmunds Vision 2031 Submission Draft document. Although the SA mostly focuses on effects within St Edmundsbury Borough, it also considers the effects of the policies on surrounding areas, the region, and on national and global issues where deemed relevant.
- 1.24 The geographical boundary of the borough is shown in Figure 1.1.

Figure 1.1 – St Edmundsbury Borough



Links to Habitats Regulations Assessment

- 1.25 The Habitats Regulations Assessment (HRA) process is required under the Conservation of Habitats and Species Regulations 2010 (as amended). These regulations are often abbreviated to, simply, the 'Habitats Regulations'.
- 1.26 Regulation 102 states that where a land use plan—
- (a) is likely to have a significant effect on a European site in Great Britain or a European offshore marine site (either alone or in combination with other plans or projects), and
 - (b) is not directly connected with or necessary to the management of the site,
- the plan-making authority for that plan shall, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.
- 1.27 In addition, the plan-making authority shall for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority specifies.
- 1.28 They shall also, if they consider it appropriate, take the opinion of the general public, and if they do so, they shall take such steps for that purpose as they consider appropriate.
- 1.29 European sites referred to include Special Areas of Conservation (SAC) and Special Protection Areas (SPA). There are three European designations relating to nature conservation within the district: Breckland Special Protection Areas (SPA), Brecklands Special Areas of Conservation (SAC) and Waveney and Little Ouse Valley Fens SAC. There are also seven European sites within a 20 km radius of the boundary of St Edmundsbury which were considered: Redgrave and South Lopham Fens SAC, Rex Graham Reserve SAC, Norfolk Valley Fens SAC, Devil's Dyke SAC, Fenland SAC, Chippenham Fen Ramsar site and Wicken Fen Ramsar site.
- 1.30 The Bury St Edmunds Vision 2031 Submission Draft document has been screened for its likely significant effect upon the identified European sites; this work has been undertaken by The Landscape Partnership on behalf of St Edmundsbury Borough Council. Although the HRA requirement and process are separate from that for SA, the two processes have been run in parallel for the Bury St Edmunds Vision 2031 document.
- 1.31 A number of recommendations were set out in the HRA Screening of Draft Bury St Edmunds Vision 2031 Preferred Options (February 2012) to ensure that there would be no likely significant effect upon any European site as a result of the Plan implementation. These recommendations were all taken on board in the Bury St Edmunds Vision 2031 Submission Draft document. The HRA Screening concluded that the Bury St Edmunds Vision 2031 Submission Draft document would have no likely significant effect on any European site.

How can I comment on this document?

- 1.32 There is an eight week public consultation on the Bury St Edmunds Vision 2031 Submission Draft document and the SA report, starting on the 18th of June and ending on the 9th of August 2013 during which comments can be received. Representations will not be considered if they are received after the closing date.
- 1.33 It would be helpful if you could respond using the online response form via the council's online public consultation system at <http://www.stedmundsbury.gov.uk/ldf>. The response form can also be downloaded from the web-site above. If you do not have access to a computer, copies of the response form can be requested by using the contact details below. Individual letters and emails will also be accepted.
- 1.34 When making a representation it is important to be specific as possible setting out the issues the representation refers to and what changes you consider should be made. Please be aware that any representations made on this document will be available for everyone to view, regardless of whether they are submitted by post or on-line.

- 1.35 Where there are groups who share a common view on an issue in the document, if possible that group should send a single representation indicating how many people it is representing and how the representation has been authorised.
- 1.36 **All representations must be received by no later than 5.00pm on the 9th of August 2013.**
- 1.37 If it is not possible to submit representations to us on-line, letters/forms/email may be sent to us using the details below:
- Planning Policy
St Edmundsbury Borough Council
West Suffolk House
Western Way
Bury St Edmunds
IP33 3YU
Tel: 01284 757368
Email: LDF@stedsbcc.gov.uk
- 1.38 You may also hand in forms/letters at the following offices:
West Suffolk House, Western Way, Bury St Edmunds
Council Offices, Lower Downs Slade, Haverhill

2. Approach and Methodology

Overview of Approach

- 2.1 The approach used in the SA of the Bury St Edmunds Vision 2031 is based on the process set out in the section 'Sustainability Appraisal' of the DCLG Plan Making Manual. The SA has been conducted to also meet the requirements of the SEA Regulations.
- 2.2 The DCLG Plan Making Manual emphasises that SA is an iterative process which identifies and reports on the likely significant effects of the plan and the extent to which its implementation will achieve the social, environmental and economic objectives by which sustainable development can be defined. The intention is that SA is fully integrated into the plan making process from the earliest stages, both informing and being informed by it.
- 2.3 Table 2.1 sets out the SA stages, tasks and relationships with the DPD preparation, as set out in the DCLG Plan Making Manual and ODPM guidance 'A practical guide to the Strategic Environmental Assessment Directive'.³

Table 2.1 - Incorporating SA in the DPD Preparation Process

| |
|--|
| DPD Stage 1: Pre-production – Evidence Gathering |
| SA Stages and tasks |
| Stage A: Setting the context and objectives, establishing the baseline and deciding upon the scope A1: Identifying other relevant policies, plans and programmes A2: Collecting baseline information A3: Identifying sustainability issues A4: Developing Sustainability appraisal objectives (the SA framework) A5: Consulting on the scope of the SA |
| DPD Stage 2: Production |
| SA Stages and tasks |
| Stage B: Developing and refining options and assessing effects B1: Testing the DPD objectives against the SA framework B2: Developing the DPD options B3: Predicting the effects of the DPD B4: Evaluating the effects of the DPD B5: Considering ways of mitigating adverse effects and maximising beneficial effects B6: Proposing measures to monitor the significant effects of implementing the DPD |
| Stage C: Preparing the Sustainability Appraisal Report C1: Preparing the SA Report |
| Stage D: Consulting on the preferred options of the DPD and SA Report D1: Public participation on the preferred options of the DPD and SA Report D2 (i): Appraising significant changes |
| DPD Stage 3: Examination |
| SA Stages and tasks |
| D2 (ii): Appraising significant changes resulting from representations |

³ ODPM (September 2005). A Practical Guide to the Strategic Environmental Assessment Directive

| DPD Stage 4: Adoption and Monitoring |
|---|
| SA Stages and tasks |
| D3: Making decisions and providing information |
| Stage E: Monitoring the significant effects of implementing the DPD |
| E1: Finalising aims and methods for monitoring |
| E2: Responding to adverse effects |

When SA stages were undertaken to date and by whom

- 2.4 The Scoping Report, which forms stage A in Table 2.1 above, was produced by council officers at St Edmundsbury Borough Council and the final report was published in April 2007. The sustainability objectives used within the scoping report were developed through the Suffolk Sustainability Appraisal Group (SSAG), which is a partnership of officers from Suffolk County Council and the seven local authorities in Suffolk. The role of the group is to monitor social, economic and environmental indicators to assess the County's progress towards sustainable development.
- 2.5 The following stakeholders were consulted on the draft SA scoping report in October 2006:
- Natural England
 - English Heritage
 - Suffolk Primary Care Trust
 - East of England Regional Assembly
 - East of England Development Agency
 - Suffolk Wildlife Trust
 - Suffolk County Council
 - Go-East
- 2.6 The Scoping Report set out the SA Framework which was used to appraise the St Edmundsbury Borough Council Core Strategy. The SA of the Core Strategy was undertaken by the Council and Atkins Ltd. The SA of the Bury St Edmunds Vision 2031 document builds on the previous sustainability work, in particular on the SA of the Core Strategy. The first SA report of the Bury St Edmunds Vision 2031 Preferred Options draft document was prepared in 2012.
- 2.7 This report provides an updated appraisal that takes into account the changes made to the Bury St Edmunds Vision 2031 Submission Draft document. The appraisal of the Draft Preferred Options and Submission Draft documents was undertaken by Atkins Ltd in 2012 and 2013 respectively.

Methodology

- 2.8 The sections below describe the methodology used for Stages A, B, C and D tasks, the results of which are documented in this report.

Stage A: Setting the Context and Objectives, Establishing the Baseline and Deciding on Scope

- 2.9 Scoping work covering stages A1 to A4 of table 2.1 above was undertaken for the Core Strategy in 2006 (Draft Scoping Report) and revised in 2007 (Updated Scoping Report) to help ensure that the SA covered the key sustainability issues which are relevant to St Edmundsbury. A comprehensive update of the list of relevant plans and programmes and baseline information was

also undertaken by Atkins during their production of SA of the Core Strategy Submission document in 2009. This served as the basis for the work on the Bury St Edmunds Vision 2031 Submission Draft SA complemented by information gathered specifically for Bury St Edmunds. Further update to the baseline information was undertaken in 2012. The results of this work are reported in section 3.

Stage B: Developing and Refining Options

Compatibility Assessment of Bury Vision 2031 objectives against SA objectives

- 2.10 A compatibility matrix was developed to identify to what extent the objectives of the Bury St Edmunds Vision are compatible with the SA objectives as set out in the SA framework. The results of this work are reported in section 4.

Assessment of Concept Plan Options

- 2.11 An assessment of the concept plan options (representing strategic alternatives in the SA process) for five identified strategic sites in Bury St Edmunds was conducted. At this early stage of assessment a broad approach to appraisal was taken to provide an initial indication of the relative sustainability of each of the options. Prediction involved using a scale from '+++' (strong positive effect) to '---' (strong negative effects) (see Table 2.2), with the associated commentary indicating any further details to note.

Table 2.2 – Options Assessment Key

| Assessment Scale | Assessment Category |
|------------------|------------------------------|
| +++ | Strongly positive |
| ++ | Moderately positive |
| + | Slightly positive |
| 0 | Neutral or no obvious effect |
| - | Slightly negative |
| -- | Moderately negative |
| --- | Strongly negative |
| ? | Effect uncertain |

- 2.12 The assessment of the options allowed the most and least sustainable aspects of each option to be identified. This informed the selection of options to be taken forwards as preferred options in the Preferred Options Bury St Edmunds Vision document. This SA reviews the changes made to the preferred options included in the Bury St Edmunds Vision 2031 Submission Draft document. The results of the assessment are presented in Section 5 and full details can be found in Appendix D.
- 2.13 More site alternatives were also considered for other parts of the town. The justification for not taking some of them forward is presenting in the SA Appendix G.

Assessment of Policies

- 2.14 The Bury St Edmunds Vision 2031 Submission Draft document contains two types of policies: generic policies and policies relating to development sites. The methodology used in the assessment of each type of policy is described below.

Generic and Strategic Allocations Policies

- 2.15 The appraisal of each of generic policy was conducted in a systematic two-stage process.
- 2.16 Using the scoping data and supporting information, the effects of the policies have been predicted for each of the SA objectives in the SA Framework. A six point scale was used to characterise the magnitude of predicted effects in terms of the change to the current baseline. Effects were also characterised in terms of their geographical extent, their duration (short, medium or long term), whether they are likely to be temporary or permanent, and the degree of certainty with which the prediction was made. Predictions were made using the evidence of the baseline data wherever possible. Short term, medium and long term effects were defined as those predicted to commence within the first five, five to ten and ten or more years of implementation of the Bury St Edmunds Vision 2031, respectively.
- 2.17 Table 2.3 details the scoring scales used to characterise the various features of the predicted effects.

Table 2.3 – Sustainability Effects Scoring

| Magnitude | Scale | Duration | Permanence | Certainty |
|-------------------|--|-----------------------------------|-------------------|-----------|
| ✓✓ Major positive | Local Within or in proximity to St Edmundsbury | ST-MT Short term - Medium term | Temp Temporary | Low |
| ✓ Minor positive | Sub-Reg Western Suffolk and surrounding districts | ST-LT Short term - Long term | Perm Permanent | Med |
| - No effect | Reg/Nat East of England and beyond | MT-LT Medium term - Long term | | High |
| ? Unclear effects | | ST Short term | | |
| ✗ Minor negative | | MT Medium term | | |
| ✗✗ Major negative | | LT Long term | | |

- 2.18 Magnitude of effects was defined in terms of progress towards achieving the relevant SA objective:
- *Major Positive* - likely to result in substantial progress towards the objective
 - *Minor Positive* - likely to result in limited progress towards the objective
 - *Major Negative* - likely to be substantially detrimental to achieving the objective
 - *Minor Negative* - likely to be to the limited detriment of achieving the objective

- 2.19 The effects predicted for each SA objective for each policy were then assessed for significance using a simple, systematic process. An assessment score was derived for each objective based on the scores for each effect characteristic (magnitude, duration, scale, permanence and certainty) for short, medium and long term effects, using the assessment scale shown in Table 2.4.

Table 2.4 – Sustainability Assessment Scoring

| | |
|-----|---|
| +++ | Strongly positive |
| ++ | Moderately positive |
| + | Slightly positive |
| 0 | No effect |
| - | Slightly negative |
| -- | Moderately negative |
| --- | Strongly negative |
| +/- | Combination of positive and negative effects / neutral effect |

For the purposes of analysing the results of the assessment, significant effects are those that result in strongly or moderately negative or positive effects.

- 2.20 The first iteration of the assessment of the policies was undertaken in January 2012.

2.21 This report updates the assessment of the policies to reflect the changes in the Bury St Edmunds Vision 2031 Submission Draft document. The results are reported in section 5 of this report.

Policies relating to Sites

2.22 The proposed development sites (and associated policies) were assessed against the SA Framework and for each location specific information was gathered that enabled the assessment according to the key in Table 2.5.

Table 2.5 - Key to Sites Assessment

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

2.23 Matrices were used to record likely sustainability effects of each site against each objective in the SA framework. Full details of the sites assessments can be found in Appendix E and summaries of the assessments are presented in Section 6.

Secondary and Cumulative Effects Assessments

2.24 The SEA Directive requires that the assessment of effects include secondary, cumulative and synergistic effects.

2.25 **Secondary or indirect effects** are effects that are not a direct result of the plan, but occur away from the original effect or as a result of the complex pathway e.g. a development that changes a water table and thus affects the ecology of a nearby wetland. These effects are not cumulative and have been identified and assessed primarily through the examination of the relationship between various objectives during the Assessment of Environmental Effects.

2.26 **Cumulative effects** arise where several proposals individually may or may not have a significant effect, but in-combination have a significant effect due to spatial crowding or temporal overlap between plans, proposals and actions and repeated removal or addition of resources due to proposals and actions. Cumulative effects can be:

- **Additive-** the simple sum of all the effects;
- **Neutralising-** where effects counteract each other to reduce the overall effect;
- **Synergistic-** is the effect of two or more effects acting together which is greater than the simple sum of the effects when acting alone. For instance, a wildlife habitat can become progressively fragmented with limited effects on a particular species until the last fragmentation makes the areas too small to support the species at all.

2.27 Many environmental problems result from cumulative effects. These effects are very hard to deal with on a project by project basis through Environmental Impact Assessment. It is at the SA level that they are most effectively identified and addressed.

2.28 Cumulative effects assessment is a systematic procedure for identifying and evaluating the significance of effects from multiple activities. The analysis of the causes, pathways and consequences of these effects is an essential part of the process.

2.29 Cumulative (including additive, neutralising and synergistic) effects have been considered throughout the entire SA process, as described below:

- As part of the review of relevant strategies, plans and programmes and the derivation of draft SA objectives, key receptors have been identified which may be subject to cumulative effects.

- In the process of collecting baseline information cumulative effects have been considered by identifying key receptors (e.g. specific wildlife habitats) and information on how these have changed with time, and how they are likely to change without the implementation of the Local Plan. Targets have been identified (where possible), that identify how close to capacity the key receptor is, which is a key determining factor in assessing the likelihood of cumulative and synergistic effects occurring, and their degree of significance.
- Through the analysis of environmental issues and problems, receptors have been identified that are particularly sensitive, in decline or near to their threshold (where such information is available).
- The development of SA objectives, indicators and targets has been influenced by cumulative effects identified through the process above.
- The likely cumulative effects of the strategic alternatives have been identified which highlighted potential cumulative effects that should be considered later in the SA process.
- Testing the consistency between the Bury St Edmunds Vision 2031 Submission Draft objectives and SA objectives has highlighted the potential for cumulative effects against specific Bury St Edmunds Vision 2031 Submission Draft objectives.
- Cumulative effects of the policies have been predicted and assessed through the identification of key receptors and SA objectives that consider cumulative effects assessment.

Mitigation

- 2.30 Mitigation measures were identified during the evaluation process to reduce the scale/importance of significant negative effects and, where possible, enhance positive effects.

Monitoring

- 2.31 SA monitoring involves measuring indicators which will enable the establishment of a causal link between the implementation of the plan and the likely significant effect (positive or negative) being monitored. It thus helps to ensure that any adverse effects which arise during implementation, whether or not they were foreseen, can be identified and that action can be taken to address them.

Stage C: Preparing the Sustainability Appraisal Report

- 2.32 The first full SA report was prepared to accompany the Draft Bury St Edmunds Vision 2031 Preferred Options document on consultation in 2012.

Stage D: Consulting on the Draft Plan and Sustainability Appraisal Report

Appraising significant changes

- 2.33 Following the consultation, the SA Report was revised to take into account significant changes to policies arising from consultation. The report assesses and reports on the effects of these changes and accompanies the Bury St Edmunds Vision 2031 Submission Draft document on consultation.
- 2.34 Consultation responses on the 2012 SA report were also considered and the SA report updated accordingly. These responses are listed in Appendix K.

Meeting the requirements of the SEA Directive

- 2.35 There is a fundamental difference between the SA and SEA methodologies. SEA is primarily focused on environmental effects and the methodology addresses a number of topic areas namely Biodiversity, Population, Human Health, Flora and Flora, Soil, Water, Air, Climatic Factors, Material Assets, Cultural Heritage and Landscape and the interrelationship between these topics.

SA, however, widens the scope of the appraisal to assess the effects of a plan to include social and economic, as well as environmental topics.

2.36 This SA has been undertaken so as to meet the requirements of the SEA Directive for environmental assessment of plans. Table 2.6 sets out where the specific SEA requirements have been met in this SA Report.

Table 2.6 - Schedule of SEA Requirements

| Requirements of the Directive | Where Covered in Report |
|---|---|
| Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is: | |
| a) An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes | Sections 1, 3, 4 and Appendix A |
| b) The relevant aspects of the current state of the environment and the likely evolution without implementation of the plan or programme | Sections 3, Appendices B and C |
| c) The environmental characteristics of areas likely to be significantly affected | Section 3 and Appendices B and C |
| d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directive 79/409/EEC and 92/43/EEC | Section 3 and Appendix C |
| e) The environmental protection objectives established at international, community or national level which are relevant to the programme and the way those objectives and any environmental considerations have been taken into account during its preparation | Section 3, Appendix A |
| f) The likely significant effects on the environment, including: short, medium and long term; permanent and temporary; positive and negative; secondary, cumulative and synergistic effects on issues such as: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. | Sections 4, 5, 6 Appendices D, E and F |
| g) The measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse effects on the environment of implementing the plan or programme. | Sections 4 and 6 Appendices E and F |
| h) An outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information | Section 5, Appendices D and G |
| i) A description of measures envisaged concerning monitoring (in accordance with regulation 17) | Section 8, Appendix H |
| j) A non-technical summary of the information provided under the above headings | Non-technical summary |

3. Plans, Baseline and Sustainability Issues and Objectives

Introduction

- 3.1 This section sets out the sustainability objectives and the baseline data has been used to inform the sustainability of a plan proposal; explaining how they were developed and have been used previously. It also explains the list of relevant plans and programmes developed in the Scoping report and the implications of them. The SEA Directive states that the Environmental Report should provide information on:

‘The plan’s relationship with other relevant plans and programmes’ and “the environmental protection objectives, established at international, [European] Community or national level, which are relevant to the plan... and the way those objectives and any environmental considerations have been taken into account during its preparation” (Annex 1 (a), (e)).

Links to other Plans, Programmes and Strategies

- 3.2 A wide range of international, national, regional and borough plans, programmes and policies (PPPs) were reviewed as the SA of the Core Strategy. This review was updated during the preparation of the Bury St Edmunds Vision 2031 SA report. The review identified the relationships between the SA and plans and programmes which, in turn, enabled potential synergies to be exploited and conflicting initiatives to be identified.
- 3.3 The purpose of this review was not only to list relevant plans and programmes, but to highlight the influence that the plans and programmes may have upon the SA in terms of themes set out within them. Appendix A lists relevant plans and policies and key sustainability themes considered.
- 3.4 This review represented the first step in the derivation of the SA Framework for the Core Strategy and the Bury St Edmunds document. As the relevant sustainability themes had been appropriately captured in the SA work for the Core Strategy, the SA objectives were therefore carried through to inform the SA Framework of the Bury St Edmunds Vision 2031 (see also Sustainability Objectives and Appraisal Criteria section below).

Baseline Conditions

- 3.5 Baseline information provides the foundation for predicting and monitoring effects and assists the identification of sustainability problems and alternative solutions of dealing with them. Sufficient information which covers the whole plan area is required to appreciate the current and future state of it, and allows for adequate prediction of the likely effects of what is proposed within the Vision document.
- 3.6 Baseline data were collected regarding a range of economic, social and environmental factors across St Edmundsbury Borough; as it is today, as well as identifying current trends.
- 3.7 St Edmundsbury baseline data were primarily developed from indicators presently being monitored by SSAG and from DCLG (previously ODPM). Approximately 140 different indicators were used, which cover a wide range of environmental, economic and social topics. The baseline conditions in St Edmundsbury are summarised in Appendix B.
- 3.8 In addition, the following studies, reports and maps prepared by the Council were used for baseline information:
- Infrastructure and Environmental Capacity Appraisal Final Report, including its Appendices, St Edmundsbury Borough Council, Forest Heath District Council, May 2009;
 - St Edmundsbury Green Infrastructure Strategy, Final Report, 2009;

- Habitats Regulations Assessment Screening for St Edmundsbury Borough Council Bury St Edmunds Vision 2031, 2013; and
- Air Quality Management Order, Cabinet 28 April 2010, St Edmundsbury Borough Council.

3.9 Below is a summary of key baseline conditions for Bury St Edmunds.

Context

- 3.10 Historically Bury St Edmunds has had national and regional importance. The centre of the town has a 12th century medieval layout and there are a significant number of historical buildings including the recently refurbished Norman Tower, Samson's Tower and the remains of the Abbey within the Abbey Gardens. The area around Bury St Edmunds to the north and south is allocated as a Special Landscape Area.
- 3.11 Bury St Edmunds is known for its Greene King Brewery located in the town centre and British Sugar which employs over 230 people and as a building has a dramatic impact on the skyline as you approach Bury St Edmunds on the A14 where subsequent industrial development has also taken place to the west of the town as one of the 12 industrial parks. Bury St Edmunds also has a Hospital 'West Suffolk Hospital' and a private 'Nuffield' facility as well as a College with over 17,000 students. (West Suffolk College)
- 3.12 Bury St Edmunds is one of the largest towns within Suffolk and has recently undergone significant retail development in the shape of 'The Arc' which includes 35 new units many of the High Street names and a new venue 'The Apex' which can seat 600 people with bespoke meeting rooms. Additional shopping can be found in the town centre at the 'Buttermarket' and the adjoining streets with many high street names and independent retail outlets.

Social Baseline

Population

- 3.13 The population of Bury St Edmunds incorporating the 10 wards of the town totals 35,473 which represents a third of the population of St Edmundsbury Borough Council. There is a high proportion of people (48%) aged 65 and over in the Borough with the younger population of 16 – 24 year olds reducing. The main ethnic group of the Borough is White British with 6% made up of other minority ethnic groups.
- 3.14 The National Index of Multiple Deprivation in 2010 ranked St Edmundsbury Borough Council as 240 out of 354 with 1 being the most deprived and therefore is considered good. In 2004 the rank score for the Haverhill South Ward (formerly Clements) 1,132 out of 8414 with Eastgate Ward in Bury St Edmunds scoring 7,805. This indicates that there are disparities between the two towns and with a higher deprivation in Haverhill in comparison with Bury St Edmunds skew the overall results for St Edmundsbury.

Health

- 3.15 The general health of the residents of Bury St Edmunds is good. However there are disparities between wards within Bury St Edmunds and in the Moreton Hall ward life expectancy on average is 85.72 years old whereas in the St Olaves Ward this reduces to 78.7 years old.
- 3.16 Bury St Edmunds is considered to be an affluent area with a lower than average unemployment. There are 2 main health problems whereby 20% of residents smoke with 15% being obese. Bury St Edmunds is fortunate to have a number of voluntary and community sector groups who are working to reduce these particular health issues.

Education

- 3.17 Bury St Edmunds has three Sure Start Centres, which provide integrated services for children aged 0-5 and their parents. There are ten primary schools: Abbot's Green, Guildhall Feoffment, Hardwick, Howard, Sebert Wood, Sexton's Meadow, St Edmund's, St Edmundsbury, Tollgate and Westgate; six middle schools: Hardwick, Horringer Court, Howard, St James, St Louis and Westley; three upper schools: County Upper, King Edward and St Benedict's; and two special schools: Priory and Riverwalk.
- 3.18 West Suffolk College is the main skills training and further education provider in the town, and is currently expanding its facilities for training in construction and performing arts. The college has also become the Bury St Edmunds home of University Campus Suffolk, bringing higher education opportunities into the town.

Culture and leisure

- 3.19 Bury St Edmunds has a rich cultural life. It is an attractive medieval town and is increasingly becoming a tourist destination. The most popular attraction in the town is the award-winning Abbey Gardens, and there is also a country park, Nowton Park, as well as many sports grounds. The Apex, a new entertainment venue, recently opened in the town centre and offers a programme of events and entertainment in this World class venue. The town also has its own festival every spring.
- 3.20 There is an equally wide range of leisure providers. The Abbey Gardens, Nowton Park, the Apex, the Athenaeum, Moyses's Hall and many other facilities are owned and managed by the borough council which has made a huge investment in leisure and cultural facilities in recent years. The private sector offers many leisure facilities too, such as private fitness clubs, restaurants and accommodation for visitors, and some of the town's most important cultural facilities are managed by voluntary organisations, such as the cathedral, the art gallery and the Georgian Theatre Royal.

Housing

- 3.21 There are 15,591 households in Bury St Edmunds, compared to 9,017 in Haverhill and 15,952 in the remaining rural areas. Of the total households 70% are owner occupied and the remaining 30% are living in rented accommodation either rented from the Council, Housing Association, private landlord or rented in other forms. Of those households 48% are living as couples, 13% are single occupation with remaining either pensioners or lone parents.
- 3.22 House prices in the Borough are higher than the national average of £160,000 with the average price for a house being £200,000 in St Edmundsbury, This means that it is difficult for many, especially first time buyers, single persons and those on low household incomes, to enter into the housing market. As it is likely the salary ration to purchase is 6.8 times the annual salary.

Economic Baseline

Retail

- 3.23 Bury St Edmunds is the major centre within St Edmundsbury, and is located in the centre west of the Borough. Bury St Edmunds is identified as a major town centre in the East of England Plan competing with nearby Regional centres of Cambridge, Ipswich and Norwich. It serves its hinterlands and adjoining districts such as Forest Heath and Mid Suffolk.
- 3.24 The largest concentration of shops in the town centre is in the Buttermarket with adjoining roads and the recently constructed development of The Arc.

Other town centre uses

- 3.25 The town centre also has a museum 'Moyses Hall' run by the Borough Council located on the Buttermarket and a Theatre just outside of the Town Centre but well within walking distance. There are the other historic attractions such as the Cathedral, Abbey Gardens. There is some overnight accommodation within the town centre area.

Economy and employment

- 3.26 St Edmundsbury is an economically prosperous Borough with around 3,955 VAT registered businesses at the end of 2007. During the 1990's the rate of formations in St Edmundsbury was consistently below the regional rate, however in recent years this has changes. In 2004 the rate for the Borough was in line with the regional rate but by 2007 it had dropped below that of the East of England.
- 3.27 The town centre is home to a large number of offices concentrated along the edges of the shopping area, with a number of smaller premises above shops. It is important to take a long-term perspective when considering the future role of the town centre as a location for employment.

Accessibility

- 3.28 Bury St Edmunds provides the main focus for public transport within the Borough having both a railway station and bus station. The railway station is located away from the town centre but within walking distance. The bus station is within the town centre and has links to the surrounding towns within St Edmundsbury and beyond. The railway station has links to Cambridge and Ipswich. However, services from the towns remain relatively poor with the former ward of Chevington been the least accessible ward in Suffolk and Stanton and Barrow one of the 15% least accessible wards in the county.
- 3.29 The major road network within the Borough comprises the A14 Felixstowe to Birmingham, the A143 Haverhill to Great Yarmouth and A134 Bury St Edmunds to the A10 outside of Kings Lynn.
- 3.30 The borough has an extremely high level of car ownership and use. Approximately 16% of the local population do not have access to a car which is well below the national average of 27%. In addition the number of people employed using their car for getting work is higher than in Suffolk and the East of England as a whole. Combined with low levels of public transport use, this represents a significant sustainability challenge to the Borough.
- 3.31 Government policy seeks to reduce car parking provision where this can improve the sustainability of centres and access to them. However, this must not be at the expense of harming the attraction of Bury St Edmunds as a retail and employment centre and any reductions should be accompanied by improvements to public transport provision.

Environmental Baseline

Cultural Heritage

- 3.32 In St Edmundsbury there are 35 conservation areas, over 3,000 Listed Buildings, 1015 buildings are also restricted by an Article 4 Direction. There are 69 Ancient Monuments and 4 listed parks and gardens.
- 3.33 One thousand of the Listed Buildings are within Bury St Edmunds and are seen as a valuable and essential part of Suffolk's identity. A lot of Bury St Edmunds medieval history is seen within the town centre although some is hidden behind elegant 17th and 18th century facades.

Water quality

- 3.34 The quality of water within the borough's rivers is generally fair to good in terms of chemical and biological quality. However the chemical quality of the rivers is worse than the average quality of rivers in the East of England. There are two rivers which flow through Bury St Edmunds, River Linnet and River Lark.

Flooding

- 3.35 Although parts of the Borough fall within areas at risk from flooding a very low proportion of property within St Edmundsbury are at risk of flooding. In recent years, very few planning applications for development in flood risk areas in St Edmundsbury have been approved against Environmental Agency advice.

Air Quality

- 3.36 The air quality throughout the borough, and in Bury St Edmunds, is generally good with no Air Quality Management Areas.

Biodiversity

- 3.37 The Borough includes one Special Protection Area (Breckland) two Special Areas of Conservation (Breckland and Waveney and Little Ouse Valley Fens) 23 SSSI (Sites of Special Scientific Interest), 144 County Wildlife Sites, two Local Nature reserves and three Country Parks.
- 3.38 Within Bury St Edmunds there are a number of parks and rivers are rich in biodiversity and these should be respected.

Key Sustainability Issues

- 3.39 The identification of the key sustainability issues most relevant to the Bury St Edmunds Vision 2031 document was based on the review of relevant plans and programmes documented in Appendix A, the analysis of the baseline data (Appendix B and above), and a consideration of issues addressed in the Vision 2031 document itself.
- 3.40 Table C1 in Appendix C presents the full results of the analysis of key sustainability issues, which are briefly summarised as:
- Significant Historic and Future Population Growth;
 - Improving Education and Qualification Attainment;
 - Fluctuating Crime Rate;
 - Insufficient Amount of Housing, including Affordable Housing and High Level of Unfit Dwellings;
 - Earnings below Regional Figures;
 - Increase in Noise Complaints;
 - Pressure on Rich Biodiversity;
 - Pressure on Landscape;
 - Rich Archaeology and Cultural Heritage;
 - Pressure on Water Resources;
 - Potential for Flood Risk;
 - Need to Adapt to a Changing Climate;

- High Energy Consumption;
- High CO₂ Emissions per Capita;
- Need to Preserve Valuable Land and Soil;
- Presence of Contaminated Land;
- Low Completions on PDL;
- High traffic volume and reliance on private car; and
- Employment for Younger People.

Sustainability Objectives and Appraisal Criteria

- 3.41 The SA framework is a key element in conducting the SA; it incorporates the baseline data and identifies key sustainability issues into a clear structure which can be used to assess the effects resulting from the implementation of the proposals in the Vision 2031 document. The use of objectives is not a formal requirement, but it is recognised as a helpful tool in which social, environmental and economic effects can be predicted and evaluated at the key stages in the production of the document.
- 3.42 The Framework consists of 22 objectives, of which progress towards will be measured using related indicators as listed in Table 3.1. The indicators also serve to clarify the intended interpretation of each objective.
- 3.43 The SA framework objectives were used consistently to appraise St Edmundsbury DPDs; they express the long term aspirations of the borough. They were developed from the work undertaken to review the list of relevant plans and programmes and the identified baseline position, including the key sustainability issues. The Framework has also been informed by work completed by SSAG, the group through which Suffolk authorities are able to evaluate their SA work.
- 3.44 The SA framework used to appraise the adopted Core Strategy was used to appraise the proposals contained in the Bury St Edmunds Vision 2031 Submission Draft document and the earlier version of this document.

Table 3.1 – SA Framework

| No | Objective | Detailed decision making criteria | Indicator |
|---|--|--|---|
| Social Objectives | | | |
| 1. | To improve the health of the population overall and reduce health inequalities | Will it improve access to high quality, health facilities? | Proportion of population with access to hospital or GP or dentist surgery |
| | | | Will it reduce health inequalities and death rates? |
| | | % of people who describe their health as good | |
| | | Overall death rate by all causes per 100,000 population | |
| | | Cancer (Malignant neoplasm's) deaths under 75 per 100,000 population | |
| | | Heart disease deaths under 75 per 100,000 population | |
| | | Respiratory disease deaths (all ages) per 100,000 population | |
| | | Deaths from self harm and injury undetermined per 100,000 population | |
| | | Number of people killed and seriously injured (KSI) in road traffic accidents (RTA) per 100,000 population | |
| | | Life expectancy (years) | |
| | | Will it encourage healthy lifestyles? | Proportion of journeys to work on foot or by cycle |
| | | | How do children travel to school? |
| | | | Obesity in the population |
| | | | Change in existing provision of outdoor playing space (youth and adult space) |
| | | | Change in existing provision of children's play space |
| Change in provision of open space | | | |
| % of footpaths and other rights of way which are easy to use by members of the public | | | |

| | | | |
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| | | | Change in amount of accessible natural green space (Districts) |
| | | | Participation in sport and active recreation (National Indicator 8) |
| 2. | To maintain and improve levels of education and skills in the population overall | Will it improve qualifications and skills of young people? | % of year 11 pupils gaining 5+ A*-C grades at GCSE |
| | | | Average point score per student at A and AS level |
| | | Will it improve qualifications and skills of adults? | Proportion of the population with no qualifications |
| | | | Working age population with NVQ level 4 or higher |
| 3. | To reduce crime and anti-social activity | Will it reduce actual levels of crime? | Crime rate per 1000 population |
| | | | Burglary Rate per 1000 population |
| | | | Violent Crime Rate per 1000 population |
| | | Will it reduce the fear of crime? | Fear of Crime |
| | | Will it reduce noise and odour concerns? | Number of domestic and commercial noise complaints |
| | | | Number of odour complaints |
| 4. | To reduce poverty and social exclusion | Will it reduce poverty and 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 |
| | | | Number of housing benefit recipients in St Edmundsbury borough |
| 5. | 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 |
| | | | Percentage of rural households within 15 minutes' walk of an hourly bus service |
| | | | Proportion of population with access to key local services e.g. GP, post office |
| | | Will it improve accessibility to shopping facilities? | New Retail Floor Space in Town Centres |
| | | | Proportion of population with access to a food shop |
| | | Will it improve access to | Number of child care places per thousand children under 5 |

| | | | |
|---|--|---|--|
| | | childcare? | |
| 6. | To offer everybody the opportunity for rewarding and satisfying employment | Will it reduce unemployment overall? | Unemployment rate – (%) unemployed persons |
| | | Will it reduce long-term unemployment? | Long-term unemployment |
| | | Will it provide job opportunities for those most in need of employment? | Proportion of lone parents and long term-ill who are economically active |
| | | Will it help to improve earnings? | Average Earnings |
| 7. | To meet the housing requirements of the whole community | Will it reduce homelessness? | Homelessness Numbers |
| | | Will it provide enough housing? | Housing Stock |
| | | | Housing Land Availability |
| | | Will it increase the range and affordability of housing for all social groups? | Affordable Housing completions |
| | | | Special Needs Housing |
| | | | Number of homes managed by Registered Social Landlords |
| | | | Dwellings per hectare of Net Developable Area |
| | | | Average property price and Housing Affordability |
| Percentage of vulnerable persons living in non-decent homes | | | |
| 8. | 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 |
| | | 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 |
| | Areas of deficiency in terms of natural green space | | |
| | Change in amount of accessible natural green space | | |

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| | | Will it encourage engagement in decision making? | Electoral turnout in local authority elections |
| | | | Number of Parish Plans completed |
| | | Will it increase the number of people involved in volunteer activities? | Number of people involved in volunteer activities |
| | | Will it improve ethnic relations? | Number / rate of racist incidents |
| | | Will it improve access to cultural facilities? | Number of visits to/uses of Council funded or part-funded museums per 1,000 population |
| | | | Number of visits to Council funded or part-funded museums that were in person per 1,000 population |
| | | | The number of pupils visiting museums and galleries in organised school trips |
| | | | Percentage of adults who have either attended an arts event or participated in an arts activity at least three times in the past 12 months (NI 11 Engagement in the arts) |

| No | Objective | Detailed decision making criteria | Indicator (source) |
|---------------------------------|--|---|--|
| Environmental Objectives | | | |
| 9. | To improve water and air quality | Will it improve the quality of inland waters? | Water quality in rivers |
| | | | Groundwater quality |
| | | Will it improve air quality? | Have annual mean concentrations of any key air pollutants been exceeded? |
| | | | Number of Air Quality Management Areas and dwellings affected |
| 10. | 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 |
| | | | Dwellings per hectare of net developable area |
| | | Will it minimise loss of the best and most versatile agricultural | Allocations on best and most versatile agricultural land (grades 1, 2, and 3a) |

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| | | land to development? | |
| | | Will it maintain and enhance soil quality? | Number of potential and declared contaminated sites returned to beneficial use |
| | | | Number / area of organic farms (ha) |
| 11. | To use water and mineral resources efficiently, and re-use and recycle where possible | Will it promote sustainable use of minerals? | Recycled aggregate production |
| | | Will it promote sustainable use of water? | Daily domestic water use (per capita consumption, litres) for St Edmundsbury |
| | | Will it maintain water availability for water dependant habitats? | Water availability for water dependent habitats |
| 12. | To reduce waste | Will it reduce household waste? | Household and municipal waste produced |
| | | Will it increase waste recovery and recycling? | Tonnage / proportion of household (and municipal) waste recycled, composted and landfilled |
| 13. | To reduce the effects of traffic on the environment | Will it effect traffic volumes? | Traffic volumes in key locations |
| | | Will it reduce the need for local travel? | Percentage of all new residential development taking place in major towns, other towns, and elsewhere |
| | | | Percentage of rural population living in parishes which have a food shop or general store, post office, pub, primary school and meeting place |
| | | | Distance to key services |
| | | Will it increase the proportion of journeys made using modes other than the private car? | Percentage of journeys to work undertaken by sustainable modes |
| | | | Percentage of schoolchildren travelling to school by sustainable modes |
| | | | Car parking standards (the number of spaces per development) |
| 14. | To reduce contributions to climate change | Will it reduce emissions of green house gases by reducing energy consumption? | Consumption of electricity - Domestic use per consumer and total commercial and industrial use |
| | | | Consumption of gas - Domestic use per consumer and total commercial /industrial use |

| | | | |
|-----|---|--|---|
| | | | Energy efficiency Local Authority Housing stock |
| | | | GHG emissions by sector and per capita emissions - proportion and absolute quantity in tonnes per year (Defra Statistics on CO ₂ emissions for local authority areas) |
| | | | Percentage of buildings achieving desired rating against national building standards such as Code for Sustainable Homes (all new dwellings meeting Code level 3 by 2010, Code level 4 by 2013 and Code level 6 by 2016) or BREEAM ('Very Good'/'Excellent' standard). |
| | | | Percentage of new development which sources a percentage of energy from low carbon or renewable sources: i. Onsite; ii. Offsite. |
| | | | Number of properties receiving grants to increase energy efficiency in their homes (e.g. from Carbon Emissions Reductions Target Scheme or the Warm Front Scheme) |
| | | Will it increase the proportion of energy needs being met by renewable sources? | Renewable energy generation: installed generating capacity. |
| 15. | To reduce vulnerability to climatic events | Will it minimise the risk of flooding to people and property from rivers and watercourses? | Flood Risk – Planning applications approved against Environment Agency advice |
| | | | Properties at risk of flooding from rivers |
| | | | Incidence of fluvial flooding (properties affected) |
| | | Will it reduce the risk of damage to people and property from storm events? | Incidence of flood watches and warnings |
| 16. | To conserve and enhance biodiversity and geodiversity | Will it maintain and enhance sites designated for their nature conservation interest statutory: SSSIs, SPA, SAC, LNRs and non-statutory: County Wildlife | Change in number and area of designated ecological sites |
| | | | Condition of CWS (National Indicator 197) |

| | | | |
|-----|---|---|--|
| | | Sites (CWS)? | |
| | | Will it avoid disturbance or damage to protected species and their habitats? | Reported condition of ecological SSSIs |
| | | | Development proposals affecting protected species outside protected areas |
| | | Will it help deliver targets and action for habitats and species within the Suffolk Biodiversity Action Plan (BAP)? | Achievement of Habitat Action Plan targets |
| | | | Achievement of Species Action Plan targets |
| | | | Development proposals affecting BAP habitats outside protected areas |
| | | Will it help to reverse the national decline in farmland birds? | Bird survey results |
| | | Will it protect and enhance sites, features and areas of geological value in both urban and rural areas? | Change in number and area of designated geological SSSIs and Regionally Important Geological/Geomorphological Sites (RIGSs) |
| | | | Reported condition of geological SSSIs and RIGSs |
| 17. | 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? | Number of listed buildings and buildings at risk |
| | | | Area of historic parks and gardens |
| | | | Number and area of Conservation Areas (CAs) and Article 4 directions |
| | | | Number of Conservation Area Appraisals (CAAs) completed and enhancement schemes (in conservation areas) implemented |
| | | Will it protect and enhance sites, features and areas of archaeological value in both urban and rural areas? | Number of Scheduled Monuments (SMs) damaged as a result of development |
| | | | Number of applications affecting known or unknown archaeological site but judged of high potential and approved with conditions requiring prior excavation or recording during development |

| | | | |
|-----|--|--|---|
| 18. | 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 PDL |
| | | | Number and percentage of existing housing commitments on PDL |
| | | | Number of vacant dwellings |
| | | Will it improve the landscape and/or townscape? | Landscape condition specified in landscape character assessments |
| | | | Number / area of town / town greens and commons |
| | | | Area of Designated Landscape, Historic Parks and Gardens |
| | | | Number of Countryside Stewardship / Environmental Stewardship schemes |
| | | | Light pollution |
| | | Number of planning applications refused for reasons due to poor design | |

| No | Objective | Detailed decision making criteria | Indicator (source) |
|----------------------------|--|---|---|
| Economic Objectives | | | |
| 19. | To achieve sustainable levels of prosperity and economic growth throughout the plan area | Will it improve business development and enhance competitiveness? | Take-up of URBAN employment floorspace (completions) |
| | | | Take-up of RURAL employment floorspace (completions) |
| | | | Employment permissions and allocations (URBAN) |
| | | | Employment permissions and allocations (RURAL) |
| | | | Net change in the total number of VAT registered businesses in the area |
| | | | Business formation rate (or new VAT registrations as % of total VAT registered stock) |
| | | Will it improve the resilience of business and the economy? | Business start ups and closures |
| | | | Employment by industry % |
| | | | Number and percentage of businesses by main industry type |

| | | | |
|-----|---|---|--|
| | | | Number and percentage of businesses by size (number of employees) |
| | | Will it promote growth in key sectors? | Number and percentage of businesses by industry type in key sectors |
| | | Will it improve economic performance in advantaged and disadvantaged areas? | Comparative industrial and office rental costs within the plan area (to complete based on identified advantaged and disadvantaged areas in own area) |
| | | Will it encourage rural diversification? | Employment permissions and allocations in rural areas (RURAL) |
| 20. | To revitalise town centres | Will it increase the range of employment opportunities, shops and services available in town centres? | Percentage of town centre units with A1 uses |
| | | Will it decrease the number of vacant units in town centres? | % Vacant units in town centres |
| 21. | To encourage efficient patterns of movement in support of economic growth | Will it reduce commuting? | Distances travelled to work for the resident population |
| | | | Import/export of workers to district and/or major towns |
| | | | Employment permissions and allocations in urban areas (URBAN) |
| | | | Number / percentage of people working from home as main place of work |
| | | Will it improve accessibility to work by public transport, walking and cycling? | Number of developments where a travel plan is submitted or is a condition of development |
| | | | Percentage of journeys to work undertaken by sustainable modes |
| | | Will it increase the proportion of freight transported by rail or other sustainable modes? | Proportion of port freight carried by rail |
| | | Will it increase the consumption of locally produced food and goods? | Number of farmers markets and farm shops |
| | | | Number of locally sourced products stocked by major supermarket chains |

| | | | |
|--|--|---|--|
| 22. | To encourage and accommodate both indigenous and inward investment | Will it encourage indigenous business? | Number of enquiries to business advice services from within area |
| | | Will it encourage inward investment? | Number of enquiries to business advice services from outside of area |
| | | Will it make land available for business development? | Employment land availability (URBAN) |
| | | | Employment land availability (RURAL) |
| | | | Employment permissions and allocations (URBAN) |
| Employment permissions and allocations (RURAL) | | | |

4. Testing the Compatibility of the Bury St Edmunds Vision and SA Objectives

Introduction

- 4.1 In order to ascertain the overall sustainability of the approach proposed for the Bury St Edmunds Vision 2031 document, the draft Bury St Edmunds Vision 2031 Objectives were tested against the SA Objectives to gauge their compatibility.

Results for Bury St Edmunds Vision 2031 Preferred Options objectives

- 4.2 Table 4.1 shows the results of the compatibility assessment of the draft Vision 2031 objectives (as at December 2011) with the SA Objectives. It indicates that in the majority of cases, where there is relevance between the two sets of objectives, these are broadly compatible. This is particularly true of the predicted compatibility against the social and economic dimensions of sustainability. SA objectives 1-8 in the SA Framework are representative of the social dimension and SA objectives 19-22 of the economic dimension.

- 4.3 The draft Bury Vision 2031 objectives were reviewed in 2012 and recommendations were put forward in order to improve the coverage of the SA objectives indicated above. A discussion relating to each draft Vision document objective is presented below.

Objective 1 - To meet the housing needs of Bury St Edmunds with a particular emphasis on the provision of affordable homes for local people and of appropriate housing for an ageing population.

- 4.4 Meeting the housing requirements of Bury St Edmunds and providing sufficient affordable housing for local people and appropriate housing for an ageing population will help to comprehensively meet the housing requirements in the area. It will also indirectly help to improve the health of those living in houses with sub-quality standards because they can't afford a better house and help to overcome poverty and social-exclusion in areas these exist and in this way help revitalise the town centre and surrounding areas.

- 4.5 New residential development has the potential to conflict with the objectives of reducing the effects of traffic on the environment as well as contribute to an increase in greenhouse gas emissions and increase the contribution to climate change. The provision of adequate levels of housing may also conflict with the preservation of biodiversity through the loss of greenfield land, archaeology through potential loss of or damage to sites of value and landscape through insensitive development but the level of conflict will be dependent on mitigation measures identified and how they are implemented on a development site basis.

Objective 2 - To maintain, develop and diversify the economic base through the provision of employment sites to meet different demands.

- 4.6 The provision of employment sites to meet different demands will provide employment opportunities for locals and others living in the surrounding areas, thus helping to achieve sustainable levels of prosperity and encourage investment. This objective will also make a contribution to reducing poverty and social exclusion and to offer the opportunity for rewarding and satisfying employment as more employment opportunities are likely to become available.

- 4.7 New employment development could increase traffic levels and the effects of traffic on the environment as well as contribute to an increase in greenhouse gas emissions and increase the contribution to climate change. The provision of employment in the outer areas of Bury St Edmunds may also conflict with the preservation of biodiversity through the loss of greenfield land,

archaeology through potential loss of or damage to sites of value and landscape through insensitive development but the level of conflict will depend on mitigation measures identified and how they are implemented for each new development site.

Objective 3 - To ensure that the necessary infrastructure required to meet the needs of new development is provided at the appropriate time.

The provision of infrastructure that meets the needs of the new development will contribute positively to making these areas more attractive for investment and support economic growth, as well as making the new housing experience for those involved a better quality experience.

Objective 4 - To meet the shopping needs of residents of Bury St Edmunds and the wider West Suffolk Sub-Region.

- 4.8 Meeting the shopping needs of those living, working and visiting Bury St Edmunds will contribute positively to achieving sustainable levels of prosperity and economic growth, help revitalise the town centre and attract indigenous and inward investment in retail. It will also contribute to improving the quality of life of those living, working and visiting Bury St Edmunds.

Objective 5 - To ensure that any new development is safe and does not compromise the natural and built up character, identity and local distinctiveness of Bury St Edmunds and improves access to green space and surrounding countryside.

- 4.9 This objective is fully compatible with SA objectives seeking to improve the health of the population, reduce crime and social disorder, improve access to services and the quality of where people live and to conserve and enhance soil resources, biodiversity and geodiversity, historical and archaeological areas of importance, quality and distinctiveness of landscapes and townscapes. It will also indirectly contribute to achieving prosperity and economic growth and attract investment through creating attractive places.

Objective 6 - To ensure development is accessible to the town centre and other services and facilities to help reduce the need to travel by unsustainable means.

- 4.10 The location of development sites so as to reduce the need to travel by sustainable means will reduce the effects of traffic on the environment therefore reducing contributions to climate change and reducing negative effects on population health due to poor air quality for example. The overall quality of life will be improved with increased access helping to overcome social exclusion and encouraging a sense of community. Improved transport and accessibility will also help to promote sustainable economic growth and attract investment and help revitalise the town centre.

Objective 7 - To support and encourage all means of sustainable and safe transport, public transport improvements, and cycleway and footway improvements.

- 4.11 The promotion of sustainable travel modes in Bury St Edmunds will enhance quality of life through increased safety being promoted, indirect improvements to health due to increased physical exercise and reduce the effects of traffic on the environment and the contributions to climate change due to a reduction in the use of the private car and consequent decrease in greenhouse gas emissions. This may also lead to efficient patterns of movement in support of economic growth and help revitalise Bury's town centre.

Objective 8 - To ensure that development is built to high standards and addresses sustainability issues including climate change adaptation, carbon emissions reduction, renewable energy provision, waste reduction, recycling and reuse and water efficiency.

- 4.12 This will enhance quality of life, reduce contributions to climate change and ensure adaptation to the unavoidable consequences of climate change. It should also contribute to improving water, soil and air quality within the borough and in Bury St Edmunds in particular, and will improve the health of the population.

Objective 9 - To ensure residents have access to schools, further educational opportunities and vocational and technical training.

4.13 This objective is directly aligned with the sustainability objective seeking to maintain and improve levels of education and skills in the population overall and will indirectly increase the opportunities for people to obtain a rewarding and satisfying employment as well as help achieve sustainable levels of economic growth and prosperity.

Recommendation:

4.14 Core Strategy Strategic Objective D *“To maintain and develop leisure, cultural, educational and community facilities, including access to green space, commensurate to the level of housing and employment growth to meet the needs of residents and visitors”* does not appear to have been properly covered by the set of 9 objectives identified in the draft Vision document. This objective is directly linked to SA objective 5. Educational facilities are covered by Vision objective 9 and access to green space and countryside in Vision objective 5 but none of the other Vision objectives cover leisure, culture or community services and facilities more widely.

4.15 Maintaining and enhancing leisure, cultural and community services and facilities appropriate to the needs of residents and visitors will improve access to these services and facilities and will make a positive contribution to the overall quality of life through possible improvements to health, education, crime, poverty and social exclusion.

4.16 It is recommended that a new objective is considered with the following wording:

“To maintain and develop leisure, cultural and community facilities, commensurate to the level of housing and employment growth to meet the needs of residents and visitors”.

Final Vision 2031 Objectives

4.17 As a result of the recommendations of the compatibility assessment and further internal work the Council arrived at the following nine final vision objectives:

- Objective 1 - To meet the housing needs of Bury St Edmunds with a particular emphasis on the provision of affordable homes and an appropriate mix of house types for local people and of appropriate housing for an ageing population.
- Objective 2 - To maintain, develop and diversify the economic base through the provision of employment sites to meet the needs of existing and future businesses.
- Objective 3 - To ensure that the necessary infrastructure required to meet the needs of new development is provided at the appropriate time.
- Objective 4 - To meet the shopping, cultural and leisure needs of residents of Bury St Edmunds and the wider West Suffolk Sub-Region.
- Objective 5 - To ensure that any new development is safe and does not compromise the natural and built up character, identity and local distinctiveness of Bury St Edmunds and improves access to green space and surrounding countryside.
- Objective 6 - To ensure development is accessible to the town centre, employment locations and other services and facilities to help reduce the need to travel by unsustainable means.
- Objective 7 - To support and encourage all means of sustainable and safe transport, public transport improvements, and cycleway and footway improvements
- Objective 8 - To ensure that development is built to high standards and addresses environmental sustainability considerations.
- Objective 9 - To ensure residents have access to schools, further educational opportunities and vocational and technical training.

Table 4.1 – Compatibility Matrix between Bury St Edmunds Vision Preferred Options Document and SA Objectives

| SA Objective | | Draft Vision 2031 Objectives | | | | | | | | |
|--------------|---|------------------------------|---|---|---|---|---|---|---|---|
| | | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 |
| 1. | To improve the health of the population overall and reduce health inequalities | ✓ | | | | ✓ | ✓ | ✓ | | |
| 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 | | | | ✓ | ✓ | ✓ | ✓ | ✓ | |
| 9. | To improve water and air quality | | | | | | ✓ | ✓ | ✓ | |
| 10. | To conserve soil resources and quality | | | | | | ✓ | | | |
| 11. | To use water and mineral resources efficiently, and re-use and recycle where possible | | | | | | | | ✓ | |
| 12. | To reduce waste | | | | | | | | ✓ | |
| 13. | To reduce the effects of traffic on the environment | ✗ | ✗ | | | | ✓ | ✓ | | |
| 14. | To reduce contributions to climate change | ✗ | ✗ | | | | ✓ | ✓ | ✓ | |
| 15. | To reduce vulnerability to climatic events | | | | | | | | ✓ | |
| 16. | To conserve and enhance biodiversity and geodiversity | ? | ? | | | ✓ | | | | |
| 17. | To conserve and where appropriate enhance areas of historical and archaeological importance | ? | ? | | | ✓ | | | | |
| 18. | To conserve and enhance the quality and local distinctiveness of landscapes and townscapes | ? | ? | | | ✓ | | | | |
| 19. | To achieve sustainable levels of prosperity and economic growth throughout the plan area | | ✓ | ✓ | ✓ | ✓ | ✓ | | | ✓ |
| 20. | To revitalise town centres | ✓ | ✓ | | ✓ | | ✓ | ✓ | | |
| 21. | To encourage efficient patterns of movement in support of economic growth | | | | | | ✓ | ✓ | ✓ | |
| 22. | To encourage and accommodate both indigenous and inward investment | | ✓ | ✓ | ✓ | ✓ | | | | |

Key:

| | |
|---|------------------------|
| ✓ | Potentially Compatible |
| ✗ | Not Compatible |
| | Not relevant |

| | | |
|--|---|--|
| | ? | Dependent on Nature of Implementation Measures |
|--|---|--|

5. Assessment of Concept Plan Options

5.1 The St Edmundsbury Core Strategy and Bury St Edmunds Vision 2031 Submission Draft document identify five areas of growth:

- North-west Bury St Edmunds;
- Moreton Hall;
- West;
- North-east Bury St Edmunds; and
- South-east Bury St Edmunds.

5.2 Appendices 5-9 of the Bury St Edmunds Vision 2031 draft document (2012) contained options for the concepts of these areas. The options were subject to a comparative appraisal, which aimed to identify the most sustainable growth option for each area. The assessment methodology for strategic options assessment is set out in section 2. Three SA objectives were excluded from the original SA framework devised during the scoping stage of the SA/SEA, as the indicators developed to measure the progress in achieving these objectives, were deemed to be beyond the sphere of influence of the concept plan options development process. These objectives are as follows:

- Objective 3 - To reduce crime and anti-social activity;
- Objective 11 - To use water and mineral resources efficiently, and re-use and recycle where possible;
- Objective 12 - To reduce waste.

5.3 The full results of the assessment are presented in Appendix D of the SA Report and the main findings are summarised in this section below.

North-East Bury St Edmunds

5.4 The St Edmundsbury Core Strategy endorses the land to the north east of Bury St Edmunds as one of five strategic locations for growth, delivering around 1,250 homes of mixed tenure and size and incorporating a mixture of other non-residential uses.

5.5 The 2012 SA appraisal considered three options for this area (see Appendix D, Table D1): Option 1, Option 2, and Option 3 (Developer Preferred Option). Option 3 was predicted to deliver the best sustainability performance against the SA objectives, in particular the following ones:

- Objective 1 - *To improve health of the population overall and reduce health inequalities* – Option 3 performs the best of all options, as it includes the largest area of strategic amenity space and also involves structural landscaping around the site's perimeter. This should help encourage an active outdoor recreation and create a higher quality living environment. In addition, this option locates the primary school in the centre of the site which would allow an easy walking access from all parts of the site, encouraging active and healthy lifestyles.
- Objective 2 - *To maintain and improve levels of education and skills in the population overall* – All options include a primary school. Option 3 performs the best as the primary school is centrally located that would provide ease of access (400m-500m) for all residents of the development.
- Objective 4 - *To reduce poverty and social exclusion* - All options would provide a proportion of affordable housing, catering for those who can't afford market prices. Option 3 performs the best in terms of providing good accessibility by foot, bicycle and bus for all residents, as it suggests a more central location for the school and

retail centre, and a better catchment of the bus route across the whole development area.

- Objective 5 - *To improve access to key services for all sectors of the population* - Option 3 performs the best in terms of providing good accessibility by foot, bicycle and bus for all residents, as it suggests a more central location for the school, retail centre and strategic amenity space, and a better catchment of the bus route across the whole development area.
- Objective 6 - *To offer everybody the opportunity for rewarding and satisfying employment* - Provision of a joint business/retail centre under Option 3 would offer job opportunities within the development area. Some job opportunities will be associated with community facilities and services provided on site. As these facilities and services will be provided in a more central location in a “hub” format, compared to other options, this option scores higher than other options. As the area represents an urban extension, its future residents will also have good access to job opportunities in Bury St Edmunds.
- Option 7 – *To meet the housing requirements of the whole community* - The area would be developed for housing and community facilities and services. All options would provide a proportion of affordable housing, catering for those who can't afford market prices. All options are assumed to provide a similar number of dwellings.
- Objective 8 - *To improve the quality of where people live and encourage community participation* – Option 3 provides the largest area of strategic amenity space, incorporates structural landscaping along the area's perimeter, providing buffer for potential noise disturbance from traffic and railway, and enhancing visual amenity. It also provides an equally good access to community services and facilities for all residents, stimulating social interaction and cohesion.
- Objective 13 - *To reduce the effects of traffic on the environment* - This option performs the best in terms of reducing the effects of traffic on the environment, as it provides good accessibility by foot, bicycle and bus for all residents. Specifically, it suggests a more central location for the school, retail centre and strategic amenity space, and a better catchment of the bus route across the whole development area.
- Objective 15 - *To reduce vulnerability to climatic events* - The development area is not susceptible to the risk of flooding. The incorporation of structural landscaping may enhance the area's resilience to climate change, in particular in the longer term.
- Objective 19 – *To achieve sustainable levels of prosperity and economic growth throughout the plan* - Option 3 proposes a joint retail/ business centre in a central location within the development area. This would provide job opportunities for new residents as well as existing residents in Bury St Edmunds.
- Objective 21 - *To encourage efficient patterns of movement in support of economic growth* - A bus route for a new bus service under this option provides the best coverage of the development area, which would make access to jobs within the development area and in Bury St Edmunds easy for everyone. A new business centre could also be accessed by foot or bicycle.

5.6 Following the 2012 consultation on the Bury St Edmunds Vision 2031 document and its SA, the Council firmed up their preferred option for the concept plan for this strategic location, taking into account the consultation comments received. The preferred option is presented in the Appendix of the Bury St Edmunds 2031 Submission Draft document and in Appendix D of this report. The preferred option accords with the SA findings.

5.7 The Council took forward the option that was assessed as most sustainable in 2012. The option was developed further as a result of the consultation with a new centrally positioned local centre, and improved cycleway connections and a confirmed connecting

bus route. As a result of these changes the option's sustainability performance has been enhanced, in particular in relation to the following SA objectives 1, 5, 8 and 13.

Moreton Hall

- 5.8 The St Edmundsbury Core Strategy proposes limited further growth at Moreton Hall that will complete the recent growth by making provision for a secondary school, providing additional recreation and community facilities, including the relocation of Bury Town Football Club, delivering around 500 homes of mixed tenure and size, including affordable homes and allocating employment land to the south of the site.
- 5.9 The 2012 SA appraisal considered four options for this area (see Appendix D, Table D5). The options assessed for this strategic site were Option 1 (Developer Preferred Option), Option 2, Option 3 and SEBC Option. All the options performed fairly similar against the SA objectives, as there are no significant differences between the proposed allocations and layouts for the development area under all of them. The main differences that allowed some differentiation are as follows:
- The options 2 and 4 (SEBC Option) allocate a larger area of land for potential employment uses than option 1 and 3.
 - The options 1 (Developer Preferred Option) and 3 include a larger area allocated for amenity space and community football project.
 - The SEBC Option delivers the best sustainability performance against the SA objectives, in particular the following ones:
- 5.10 Overall, due to a larger employment land allocation, the options 2 and 4 (SEBC Option) scored slightly higher than the options 1 and 3 against the following SA objectives:
- Objective 2 - To maintain and improve levels of education and skills in the population overall;
 - Objective 6 - To offer everybody the opportunity for rewarding and satisfying employment;
 - Objective 19 - To achieve sustainable levels of prosperity and economic growth throughout the plan area;
 - Objective 22 - To encourage and accommodate both indigenous and inward investment.
- 5.11 On the other hand the options 2 and 4 (SEBC Option) scored slightly lower than the options 1 and 3 against the following objectives:
- To improve the quality of where people live and encourage community participation
 - To improve health of the population overall and reduce health inequalities
- 5.12 In general, the options 2 and 4 were predicted to deliver a higher performance against the SA framework and therefore they represent preferable options from the SA perspective.
- 5.13 Following the 2012 consultation on the Bury St Edmunds Vision 2031 document and its SA, the Council firmed up their preferred option for the concept plan for this strategic location, taking into account the consultation comments received. The preferred option based on the option 4 (SEBC Option) accords with the SA findings. It is presented in the Bury St Edmunds 2031 Submission Draft document and in Appendix D of this report.
- 5.14 The Council took forward the option that was assessed as one of the two most sustainable ones in 2012. The option was developed further as a result of the consultation increasing the number of cycling routes that link the local centre to the residential area and extending a relief road to connect to the site. As a result of these changes the option's sustainability performance has been enhanced, in particular in relation to the SA objective 1 (*improve health of the population*) and 13 (*reduce the effects of traffic*).

West of Bury St Edmunds

- 5.15 West of Bury St Edmunds has been identified as a location that will deliver, inter alia, 450 new homes, makes provision for the long term development of a sub-regional health campus (relocation of the West Suffolk Hospital), provides traffic relief to Westley and maintains the identity and segregation of Westley.
- 5.16 The 2012 SA appraisal considered four options for this area (see Appendix D, Table D4): Option 1, Option 2, Developer Preferred Option and SEBC Preferred Option. The SEBC Preferred Option was predicted to deliver the best sustainability performance due to the most effective traffic relief provided for the nearby town of Westley through incorporating Fornham Lane and Hill Toad closures and providing separate links into Westley and to Westley Road as part of the suggested site layout. This led to the higher performance compared to the other options against the following SA objectives:
- Objective 1 - *To improve health of the population overall and reduce health inequalities* - Similar to other options, this option includes a new hospital and is located close to a secondary retail / business centre and a middle school. All options include a good network of pedestrian/ cycle routes and recreational footpaths linking the development with the countryside, the town and amenity spaces. In addition to other options, this option would provide for better traffic relief to the town of Westley, which would benefit local air quality and public health.
 - Objective 8 - *To improve the quality of where people live and encourage community participation* - The option would include the provision of pedestrian/cycle links to secondary retail/business centre and amenity spaces which should add to the quality of life in the new neighbourhood. The structural landscaping will enhance visual amenity for the hospital site. Traffic relief for Westley provided through this option would improve the quality of life for the town residents.
 - Objective 9 - *To improve water and air quality* - As the area is a greenfield site, its development is likely to lead to some adverse effects on water and air quality. The site incorporates structural landscaping, which could provide a function of SUDS, protecting underground water quality. This option provides additional benefits, effectively relieving traffic in Westley and benefitting local air quality.
 - Objective 13 - *To reduce the effects of traffic on the environment* - This option performs the best in terms of reducing the effects of traffic on the environment, as it would most effectively relieve traffic in the nearby town of Westley.
 - Objective 14 - *To reduce contributions to climate change* - All options include a hospital and are located close to existing services and facilities (e.g. a middle school, retail/business centre), which will help minimise the need to travel. Provision of strategic amenity space will further reduce the need to commute and travel for recreation activities. Additionally, traffic relief in Westley will help reduce GHG transport related emissions.
- 5.17 Following the 2012 consultation on the Bury St Edmunds 2031 document and its SA, the Council firmed up their preferred option for the concept plan for this strategic location, taking into account the consultation comments received. The preferred option is presented in the Appendix of the Bury St Edmunds 2031 Submission Draft document and in Appendix D of this report. The preferred option accords with the SA findings.
- 5.18 The Council took forward the option that was assessed as most sustainable in 2012. The option was developed further as a result of the consultation by increasing structural landscaping within the site and around the perimeter, increasing cycle routes throughout the site area and confirming a potential bus route crossing the site. As a result of these changes the option's sustainability performance has been enhanced, in particular in relation to the SA objective 1, 8, 13 and 21,

North-West Bury St Edmunds

- 5.19 The St Edmundsbury Core Strategy endorses the land to the north west of Bury St Edmunds as one of five strategic locations for growth, delivering around 900 homes of mixed tenure and size, including affordable homes; providing opportunities for B1 use class local employment and delivering additional education, community and leisure facilities.
- 5.20 This area site lies on the north-western edge Bury St Edmunds. It is bound by the Mildenhall Road (A1011) to the north east, the town of Fornham All Saints and Tutt Hill (B1106) to the North West, Bury St Edmunds Golf Club to the south west and the existing urban edge to the south east. The town of Fornham All Saints is clearly visible from the site. The Core Strategy requires the separate identity of the town to be maintained.
- 5.21 The SA appraisal considered three options for this area (see Appendix D, Table D2): Option 1, Option 2 and Developer Preferred Option. The Option 1 was predicted to deliver the best sustainability performance against the SA objectives. Specifically, it offers advantages compared to the other options against the following SA objectives:
- *Objective 1 - To improve health of the population overall and reduce health inequalities* - The option would locate development in good access to health care facilities in the town (within 30min by public transport). The option would include a good network of pedestrian/ cycle routes and recreational footpaths linking the development with the countryside, the town and amenity spaces. Additionally, this option envisages the creation of landscaped parkland between the development area and Fornham All Saints, which would allow for an active recreation of residents and provide benefits for public health.
 - *Objective 2 - To maintain and improve levels of education and skills in the population overall* - The option would include a new primary school within easy access for all future residents (approx. 400m). The development area would be adjacent to the Northern Way Industrial Estate providing immediate local employment opportunities. In addition, this option would allocate land for potential employment uses next to the existing industrial estate.
 - *Objective 6 - To offer everybody the opportunity for rewarding and satisfying employment* - The option would provide a joint retail/business centre within the development area providing new employment opportunities. Local job opportunities would also be associated with community facilities and services provided on site and the nearby industrial estate. As the area would represent an urban extension, its future residents would have good access to job opportunities in Bury St Edmunds and beyond. In addition, this option would allocate land for potential employment uses next to the existing industrial estate.
 - *Objective 8 - To improve the quality of where people live and encourage community participation* - This option would include the provision of community facilities, green links, pedestrian/cycle routes and amenity spaces which should add to the quality of life in the new neighbourhood. Additionally, this option would create landscaped parkland between the development area and Fornham All Saints, which would enhance local amenity and allow for an active recreation of residents.
 - *Objective 14 - To reduce contributions to climate change* - The option would provide some services and facilities (e.g. a primary school, retail/business centre) within the development area, which would help minimise the need to travel and, therefore, reduce GHG emissions. Option 1 performs better than the other two options as it is likely to provide new job opportunities and local parkland within the development area. This would further reduce the need to commute and travel for recreation activities.

- Objective 18 - *To conserve and enhance the quality and local distinctiveness of landscapes and townscapes* - Although the development of the area would decrease a gap between Bury St Edmunds and Fornham All Saints, Option 1 involves 'Green Separation' which would help preserve the character and identity of the town and help enhance the area's landscape quality.
- 5.22 Following the 2012 consultation on the Bury St Edmunds Vision 2031 document and its SA, the Council firmed up their preferred option for the concept plan for this strategic location, taking into account the consultation comments received. The preferred option is presented in the Appendix of the Bury St Edmunds 2031 Submission Draft document and in Appendix D of this report. The preferred option accords with the SA findings.
- 5.23 The Council took forward the option that was assessed as most sustainable in 2012. The option was developed further as a result of the consultation adding a new leisure centre and playing field in the eastern part of the site, improving cycling routes throughout the site, confirming a potential bus route offering connections from the north to the south-east and south-west, and shifting the primary school to a more central and accessible location. As a result of these changes the option performs even better in the sustainability terms, in particular in relation to the following SA objectives 5, 6, 8, 13 and 21.

South-East Bury St Edmunds

- 5.24 The St Edmundsbury Core Strategy endorses the land to the south east of Bury St Edmunds as one of five strategic locations for growth, delivering around 1,250 homes of mixed tenure and size, including affordable homes and additional education, community and leisure facilities.
- 5.25 The 2012 SA appraisal considered three options for this area (see Appendix D, Table D3): Option 1, Option 2 and Option 3. Option 3 was predicted to deliver the best sustainability performance against the SA objectives, in particular the following ones:
- Objective 1 - *To improve health of the population overall and reduce health inequalities* - This option would perform the best of all options, as it would include the largest area of strategic amenity space and also involve structural landscaping around the site's perimeter. This should help encourage an active outdoor recreation and create a higher quality living environment. In addition, similar to option 3 (i) this option would locate the primary school more centrally which would allow an easy walking access from all parts of the site, encouraging active and healthy lifestyles.
 - Objective 2 - *To maintain and improve levels of education and skills in the population overall* - This option suggests the most optimal location of a primary school - in the central part of the site, which would provide easy access (400m-800m) for residents in both northern and southern parts of the site. In addition, all options provide employment uses in the form of a primary and two secondary retail/ business centres.
 - Objective 5 - *To improve access to key services for all sectors of the population* - This option performs slightly better than the other options, as in addition to the features similar to other options (e.g. very good links to the town centre on a cycle /pedestrian path; good links to public transport with links to the railway station and town centre; the provision of a new primary school, primary and secondary business/retail centre within a walkable distance for all future residents), it incorporates an additional secondary retail/business centre. This makes access to retail/business centres easier for all future residents.
 - Objective 6 - *To offer everybody the opportunity for rewarding and satisfying employment* - Provision of a primary and two secondary business/retail centres under this option would offer more job opportunities within the development area compared to the other options. Some job opportunities would be associated with community facilities and services provided on site. As these facilities and services

would be provided in a greater number of locations compared to other options, this option scores higher than options 1 and 2. As the area represents an urban extension, its future residents would also have good access to job opportunities in Bury St Edmunds.

- Objective 8 - *To improve the quality of where people live and encourage community participation* - Option 3 would provide a large area of strategic amenity space and incorporate more structural landscaping along the area's perimeter than other options, providing buffer for potential noise disturbance from road traffic and enhancing visual amenity. It would also provide an equally good access to community services and facilities for all residents, stimulating social interaction and cohesion.
- Objective 9 - *To improve water and air quality* – This option performs slightly better than the rest of the options, as it incorporates a greater amount of structural landscaping, which could provide a function of SUDS, protecting underground water quality.
- Objective 10 - *To conserve soil resources and quality* – although the proposed development is likely to lead to the loss of agricultural land, this option performs slightly better than the other options, as it incorporates a greater amount of structural landscaping than other options and a large area of strategic amenity space (similar to option 3), which could reduce hard surfacing and the rate of polluted runoff affecting soil quality.
- Objective 13 - *To reduce the effects of traffic on the environment* - This option performs the best in terms of reducing the effects of traffic on the environment, as it provides good accessibility by foot, bicycle and bus for all residents. It suggests a more central location for the school, three retail centres across the site and accessible strategic amenity space.
- Objective 14 - *To reduce contributions to climate change* - This option would minimise the use of a private car and maximise the use of sustainable transport modes more than the other options. It also incorporates structural landscaping, functioning as a carbon sink; therefore this option delivers more positive performance than the rest of the options.
- Objective 15 – *To reduce vulnerability to climatic events* - Some of the development area is in flood zone. The incorporation of structural landscaping may enhance the area's resilience to climate change in the longer term.
- Objective 19 - *To achieve sustainable levels of prosperity and economic growth throughout the plan area* - This option proposes a primary retail and business centre located in the northern part of the site along with two secondary retail/business centres within the development area. This would provide further job opportunities for new residents as well as existing residents in Bury St Edmunds.
- Objective 21 - *To encourage efficient patterns of movement in support of economic growth* - Bus service is likely to be proposed as part of all options, which should help access jobs in Bury St Edmunds. Three new business centres under this option could also be accessed by foot or bicycle from all parts of the proposed development.
- Objective 22 - *To encourage and accommodate both indigenous and inward investment* - Allocation of this development area is attractive for developers, particularly due to allowing for three business centres.

5.26 Following the 2012 consultation on the Bury St Edmunds Vision 2031 document and its SA, the Council firmed up their preferred option for the concept plan for this strategic location, taking into account the consultation comments received. The preferred option is

presented in the Appendix of the Bury St Edmunds 2031 Submission Draft document and in Appendix D of this report. The preferred option accords with the SA findings.

- 5.27 The Council took forward the option that was assessed as most sustainable in 2012. The option was developed further as a result of the consultation by improving cycleway connectivity throughout the site, confirming a potential bus route crossing the area from the north to the south, introducing a new centrally located community centre and two new employment areas (in the centre and south of the site) and shifting the position of the school to a more central location. It should be noted that whilst there are no longer two supporting secondary retail/business centres, there is a new community centre and two small-scale employment areas that are better located than the previous facilities and will provide supporting community and employment uses. All of the key facilities are now centrally located and in a walkable distance for both residential areas (400m-800m). As a result of these changes the option's sustainability performance has been enhanced, in particular in relation to the following SA objectives 1, 5, 6, 8, 13, 19 and 21.

6. Assessment of Policies

Overview

- 6.1 The Bury St Edmunds Vision 2031 Submission Draft document allocates development sites in Bury St Edmunds and immediate surroundings and sets policies accordingly. Allocations are proposed for a number of strategic sites and as well as other residential/mixed and employment sites and other uses sites. Eight generic policies are also proposed, which include BV1, BV2, BV18, BV19, BV22, BV25, BV26 and BV27.
- 6.2 The development of the policies was informed by the preceding concept options and site selection process. The justifications for not selecting the alternative sites are included in the SA Appendix G. The explanation of which preferred alternatives for the strategic sites' development were taken forward is presented in Section 5.
- 6.3 This section of the report sets out the revised assessment of policies which were previously assessed at the preferred option stage in 2012. This assessment focuses on the changes made to the Submission Draft document as a result of the public consultation comments, Council further internal work and the SA recommendations proposed in 2012. The Appendix J identifies how the 2012 SA recommendations were taken on board during the preparation of the Submission Draft document.

Strategic Sites

- 6.4 Five Strategic Sites are allocated in the Bury St Edmunds Vision 2031 Submission Draft document in policies B3 – BV7. New neighbourhoods at these sites will have a mix of uses including homes, jobs, community and social facilities.

The Bury St Edmunds Vision 2031 document allocates five new strategic development sites in Table 6.1.

Table 6.1 - Proposed allocations in Strategic Sites

| Site Reference Number | Proposed allocations | Size of site (ha) | Use | Total number of homes | Type of site |
|-----------------------|------------------------------|-------------------|--|-----------------------|--------------|
| BV3 | North West Bury St Edmunds | 76.5 | Mixed use (residential, employment, community and social facilities) | 900 | Greenfield |
| BV4 | Moreton Hall Bury St Edmunds | 34.1 | | 500 | Greenfield |
| BV5 | West Bury St Edmunds | 54.3 | | 450 | Greenfield |
| BV6 | North East Bury St Edmunds | 66.5 | | 1250 | Greenfield |
| BV7 | South East Bury St Edmunds | 70 | | 1250 | Greenfield |

Other Residential/Mixed Use sites

- 6.5 The Bury St Edmunds Vision 2031 Submission Draft document allocates 11 residential and mixed use development sites as shown in Table 6.2.

Table 6.2 - Proposed allocations in Other Development sites

| Sit | Proposed | Size of | Use | Total | Type of site |
|-----|----------|---------|-----|-------|--------------|
|-----|----------|---------|-----|-------|--------------|

| Reference Number | allocations | site (ha) | | number of homes | |
|------------------|------------------------------------|-----------|---|-----------------|------------|
| BV8 | Station Hill | 6.9 | Mixed use (including residential) | e300 | Brownfield |
| BV9 | Tayfen Road | 3.8 | Mixed use (including residential) | 100 | Brownfield |
| BV10(a) | Bury St Edmunds Garden Centre | 1.75 | Residential | 52 | Brownfield |
| BV10(b) | Land at Jacqueline Close | 1.7 | Residential | 50 | Brownfield |
| BV10(c) | Hospital Site, Hospital Road | 1.4 | Residential | 65 | Brownfield |
| BV10(d) | Shire Hall | 1.3 | Residential/community use/playing field | 66 | Brownfield |
| BV10(e) | Weymed Site | 0.27 | Residential | 14 | Brownfield |
| BV10(f) | Land at School Yard | 0.64 | Residential | 32 | Brownfield |
| BV10(g) | Almoners Barn, Cullum Road | 0.24 | Residential | 12 | Brownfield |
| BV10(k) | Garages and Bus Depot, Cotton Lane | 0.7 | Mixed use (including residential) | 50 | Brownfield |
| BV11 | Land at Ram Meadow | 3.84 | Mixed use (including residential) | 22 | Brownfield |

Employment/ Alternative Commercial Business/Mixed Uses Sites

6.6 Policy BV13 allocates one strategic employment site that has been designated in Policy CS9 of the St Edmundsbury adopted Core Strategy in land to the east of the Suffolk Business Park in Bury St Edmunds.

6.7 There are a number of General Employment Areas in the town, some of which have opportunities for the further development and intensification of use. In particular the occupation or redevelopment of vacant premises and land will be encouraged in advance of allowing development on new sites. Within the General Employment Areas some sites have been allocated for development under Policy BV14 and/or allocated for redevelopment or re-use of sites and buildings for alternative business/mixed activities which do not necessarily fit neatly into B Use Classes under Policy BV15, as shown in Table 6.3.

Table 6.3 - Proposed allocations for Employment/Alternative Commercial Business/Mixed Uses sites

| Site Reference Number | Proposed allocations | Developable area (ha) | Use | Type of site |
|-----------------------|---|-----------------------|-------------------------------------|--------------|
| BV13 | Moreton Hall – extension to Suffolk Business Park | 68.28 | Employment Uses (Classes B1 and B8) | Greenfield |
| BV14(a) | Anglian Lane | 0.40 | B1 & B8 uses | Brownfield |

| | | | | |
|-------------------|----------------------------|-------|--|------------|
| BV14(b) / 15(a) | Barton Road | N/A | Alternative commercial business/mixed activities which do not necessarily fit neatly into B Use Classes | Brownfield |
| BV14(c) / BV15(b) | Blenheim Park | 1.27 | B1, B2 & B8 uses and alternative commercial business/mixed activities which do not necessarily fit neatly into B Use Classes | Brownfield |
| BV14(e) | Suffolk Business Park | 14.79 | B1 & B8 uses | Brownfield |
| BV14(f) | Chapel Pond Hill | 0.88 | B1, B2 & B8 uses | Brownfield |
| BV14(g) / BV15(d) | Eastern Way | 2.27 | B1, B2 & B8 uses and alternative commercial business/mixed activities which do not necessarily fit neatly into B Use Classes | Brownfield |
| BV14(h) | Enterprise Park, Etna Road | N/A | B1 & B8 uses | Brownfield |
| BV14(i) / BV15(e) | Mildenhall Road | 1.12 | B1, B2 & B8 uses and alternative commercial business/mixed activities which do not necessarily fit neatly into B Use Classes | Brownfield |
| BV14(k) / BV15(f) | Northern Way | 0.34 | B1, B2 & B8 uses and alternative commercial business/mixed activities which do not necessarily fit neatly into B Use Classes | Brownfield |
| BV14(m) | Greene King, Friars Lane | N/A | B1, B2 & B8 uses and alternative commercial business/mixed activities which do not necessarily fit neatly into B Use Classes | Brownfield |
| BV14(n) | Rougham | N/A | B1, B2 & B8 uses and alternative commercial business/mixed activities which do not necessarily fit neatly into B Use Classes | Brownfield |
| BV15(g) | Western Way | N/A | Alternative commercial business/mixed activities which do not necessarily fit neatly into B Use Classes | Brownfield |
| BV14 (b) / 15(c) | British Sugar, Hollow Road | N/A | Alternative commercial business/mixed activities which do not necessarily fit neatly into B Use Classes and B2 General Industrial uses | Brownfield |
| BV17 | Bury St | N/A | Retail | Brownfield |

| | | | | |
|--|---------------------|--|--|--|
| | Edmunds Retail Park | | | |
|--|---------------------|--|--|--|

New and Existing Local Centres Sites

- 6.8 Sites for the existing local centres will be safeguarded and sites for new centres will be provided within the development as shown in Table 6.4.

Table 6.4 – Existing and Proposed Allocations for Local Centres

| Site Reference Number | Proposed allocations | Use |
|-----------------------|---|--|
| BV12 (a) | Barton Road | <u>Existing Local Centres</u> Mix of uses could include Leisure and Recreation; Health and Community facilities; Small scale retail development; and Education. |
| BV12 (b) | Cadogan Road | |
| BV12 (c) | Glastonbury Court | |
| BV12 (d) | Hardwick Precinct | |
| BV12 (e) | Lake Avenue Parade | |
| BV12 (f) | Moreton Hall | |
| BV12 (g) | The Parade, Ridley Road | |
| BV12 (h) | St Olaves Precinct | |
| BV12 (i) | Stamford Court | |
| BV12 (j) | North East Bury St Edmunds strategic site | <u>New Local Centres</u> The locations and mix of uses will be identified through the Masterplan process |
| BV12 (k) | Moreton Hall Strategic Site | |
| BV12 (l) | North West Bury St Edmunds strategic site | |
| BV 12 (m) | South East Bury St Edmunds strategic site | |

Other Uses Sites

- 6.9 Sites for other uses as shown in Table 6.5 are also allocated.

Table 6.5 - Proposed Allocations for Other Uses

| Site Reference Number | Proposed allocations | Use |
|-----------------------|--|--|
| BV20 | Land West of Rougham Hill | Outdoor recreational use |
| BV21 | Rougham Airfield | Airfield, showground and outdoor events uses |
| BV23 | West Suffolk Hospital and St. Nicholas Hospice | Health care and associated uses |
| BV24 | West Suffolk College | Education and associated uses |

Assessment of Generic Policies

- 6.10 The Bury St Edmunds Vision 2031 Submission Draft document contains eight generic policies – BV1, BV2, BV18, BV19, BV22, BV25, BV26 and BV27 covering themes such as Homes and Communities, Sustainability and Climate Change, Culture and Leisure and Education and Skills and Historic and Natural Environment. The appraisal results for these policies follows.

Policy BV1 Presumption in Favour of Sustainable Development

- 6.11 The Council proposes the insertion of a new policy expressing how the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF) will be applied locally. The Council's policy has adopted verbatim the model policy which the Planning Inspectorate has developed as an appropriate way for local authorities of meeting this expectation as follows:

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in Neighbourhood Plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Councils will grant permission unless material considerations indicate otherwise – taking into account whether:

- *Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or*
- *Specific policies in that Framework indicate that development should be restricted.*

Note: This policy has been published by the Planning Inspectorate and is required to be included in all Local Plans.

- 6.12 Policy CS2 – Sustainable Development contained in the St Edmundsbury Core Strategy is an overarching policy which has a fundamental aim to ensure that development within the borough is sustainable. It aims to deliver sustainable development through ensuring the protection and enhancement of natural resources and the sustainable design of the built environment. This policy has arisen as a direct result of earlier SA work recommendations for such an overarching policy on Sustainable Development to be contained in the Core Strategy.

- 6.13 Policy BV1 (Presumption in Favour of Sustainable Development) can be viewed as complementary to the Core Strategy Policy CS2, as it contains further explanation on how the Council will work pro-actively with prospective applicants and that planning applications which accord with the policies contained in the Local Plan will be approved without delay.
- 6.14 However, Policy BV1 introduces exceptions to Policy CS2. The exceptions are planning applications for which there are no local policies of relevance or the relevant local policies are out of date. In this case the Council is required to grant planning permission, unless the assessment against policies in the NPPF indicates that adverse impacts significantly outweigh the benefits or that development should be restricted.
- 6.15 It isn't the role of this SA to attempt to assess the NPPF's sustainability credentials but key aspects of the NPPF are introduced and discussed below.
- 6.16 The NPPF recognises that there are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:
- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
 - a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
 - an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.
- 6.17 A number of policies in the NPPF provide the Government's view of what sustainable development in England means in practice for the planning system. The policies are grouped under the following themes:
1. Building a strong, competitive economy
 2. Ensuring the vitality of town centres
 3. Supporting a prosperous rural economy
 4. Promoting sustainable transport
 5. Supporting high quality communications infrastructure
 6. Delivering a wide choice of high quality homes
 7. Requiring good design
 8. Promoting healthy communities
 9. Protecting Green Belt land
 10. Meeting the challenge of climate change, flooding and coastal change
 11. Conserving and enhancing the natural environment
 12. Conserving and enhancing the historic environment
 13. Facilitating the sustainable use of minerals
- 6.18 5.19 A comparison between the NPPF's policies themes and Bury St Edmunds Vision 2031 objectives (as set out below) is deemed appropriate.

Bury St Edmunds Vision objectives

- Objective 1 - To meet the housing needs of Bury St Edmunds with a particular emphasis on the provision of affordable homes and an appropriate mix of house types for local people and of appropriate housing for an ageing population.
- Objective 2 - To maintain, develop and diversify the economic base through the provision of employment sites to meet the needs of existing and future businesses. .
- Objective 3 - To ensure that the necessary infrastructure required to meet the needs of new development is provided at the appropriate time.
- Objective 4 – To meet the shopping, cultural and leisure needs of residents of Bury St Edmunds and the wider West Suffolk Sub-Region.
- Objective 5 - To ensure that any new development is safe and does not compromise the natural and built up character, identity and local distinctiveness of Bury St Edmunds and improves access to green space and surrounding countryside.
- Objective 6 - To ensure development is accessible to the town centre, employment locations and other services and facilities to help reduce the need to travel by unsustainable means.
- Objective 7 - To support and encourage all means of sustainable and safe transport, public transport improvements, and cycleway and footway improvements.
- Objective 8 - To ensure that development is built to high standards and addresses environmental sustainability issues.
- Objective 9 - To ensure residents have access to schools, further and higher educational opportunities, vocational and technical training.

6.19 It can be concluded that there is a close alignment between both sets of objectives and themes. For both the Bury St Edmunds Vision and the NPPF, pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life.

6.20 Therefore, it is considered that following the policies in the NPPF (in the case of planning applications for which there are no local policies of relevance or the relevant local policies are out of date) will also contribute positively to pursuing sustainable development in Bury St Edmunds.

Policy BV2 Housing Development within Bury St Edmunds

6.21 Policy BV2 permits new residential development, residential conversion schemes, residential redevelopment and replacement of existing dwellings with a new dwelling within the Housing Settlement Boundary for Bury St Edmunds (as defined on the Policies Map) where it is not contrary to other policies in the plan.

6.22 The appraisal of the policy (Table E2 in Appendix E) indicates that focusing development within the Settlement Boundary for Bury St Edmunds will contribute to securing long term investment in local health facilities (SA Objective 1), local education facilities (SA objective 2) and improved access to services such as shopping facilities (SA objective 5) as a result of economies of scale and increase in demand. The policy will also ensure that local housing requirements in the Bury St Edmunds will be met (SA objective 7).

6.23 From an environmental perspective, new residential development in Bury St Edmunds will result in a number of environmental effects on SA objectives relating to water, soil and air media, biodiversity, historic assets and valued landscapes. Such effects will need to be given careful consideration as part of any new development as required by Core Strategy CS2 Sustainable Development.

- 6.24 Additional development in Bury St Edmunds may result in the revitalisation of the town centre (SA objective 20) through increasing the range of employment opportunities and shops and services available and also in providing a local supply of workers for new and existing businesses thus supporting local economic growth (SA objective 19).

Policy BV18 – District heating network opportunity areas and Policy BV19 – Community Infrastructure Levy and Allowable Solutions

- 6.25 These two policies have been assessed together as they fall under the theme Sustainability and Climate Change and are closely related. Together they seek to reduce the contribution of Bury St Edmunds to climate change through promoting opportunities for strategic district heating networks and funding these and other energy efficiency and carbon dioxide reduction projects. New strategic development in a district heating opportunity network areas will be required to contribute to the establishment of such a network and all other development to use low carbon energy sources. Funding from the Community Levy Structure and, in future, Allowable Solutions will be earmarked for the development of district heating networks and other CO₂ reductions projects.
- 6.26 The appraisal shows that these policies (Table E3 in Appendix E) will make a significant contribution towards SA objective 14 (To reduce contributions to climate change) through effective reductions in CO₂ emissions from new development. They are also likely to have a significant positive effect on SA objective 19 (To achieve sustainable levels of prosperity and economic growth) through the provision of a potentially cheaper source of heating thus reducing the costs to the local economy. The support for energy efficiency and carbon dioxide reduction projects and strategic district heating networks will help attract investment and generate work opportunities in the green economy, delivering benefits against the SA objectives 19 (prosperity and economic growth) and 22 (encourage and accommodate investment).

Policy BV22 Allotments

- 6.27 This policy will not allow loss of allotments unless it can be demonstrated that there is no local demand for the allotment; or suitable mitigation can be identified and made available. In addition, any replacement provision should take account of the needs of the locality, accessibility and suitability and sites for the provision of additional allotments will be identified, where appropriate in Masterplans and Development Briefs.
- 6.28 This policy exhibits a number of positive effects against social objectives. Positive effects on improving health (SA objective 1) have been identified as provision of additional allotments will provide increased opportunity for active leisure time spending and growing of healthier food. Positive but not significant indirect effects identified against SA objective 5 as provision of allotments may provide increased opportunity for access to active leisure facilities and SA objective 8 as the protection and provision of additional allotments may encourage community participation. From an environmental perspective, this policy should help to conserve soils through the protection of and provision of additional allotments. Allotments can also play an important role in conserving and enhancing biodiversity by providing green spaces and wildlife habitats.
- 6.29 The full appraisal of the policy can be found in Table E4 in Appendix E.

Policy BV25 Safeguarding Educational Establishments

- 6.30 This policy directly addresses SA objective 2 'To maintain and improve levels of education and skills in the population in general'. By ensuring that existing and proposed schools will be safeguarded for community and educational uses, significant positive effects will result against this SA objective.

6.31 The policy will also ensure that accessibility to schools in Bury St Edmunds is maintained or enhanced with a positive effect on SA objective 5 'To improve access to key services for all sectors of the population'. In addition, safeguarding educational facilities for community use in Bury St Edmunds will encourage community participation, with a positive effect on SA objective 8 'To improve the quality of where people live and to encourage community participation'.

6.32 The full appraisal of the policy can be found in Table E5 in Appendix E.

Policy BV26 Conserving the Setting and Views from the Historic Core

6.33 This policy is aimed at preserving or enhancing the townscape and landscape setting of the Bury St Edmunds Town Centre Conservation Area indicating that special care will be taken to ensure that views from and into this historic centre remains unspoilt.

6.34 From a social perspective, this policy may have indirect positive effects on improving the quality of where people live (SA objective 8) through the enhancements it will deliver.

6.35 SA objective 17 'To conserve and where appropriate enhance areas of historical and archaeological importance' and SA objective 18 'To conserve the quality and local distinctiveness of landscapes' will be positively affected through the enhancement of areas of historical and townscape importance.

6.36 The policy is also likely to deliver positive economic effects as the protection of the townscape and landscape of the town centre conservation area can potentially result in positive effects in achieving sustainable levels of prosperity and economic growth (SA objective 19) as well as revitalise Bury town centre (SA objective 20) through an increased attractiveness of the area to visitors.

6.37 The full appraisal of the policy can be found in Table E6 in Appendix E.

Policy BV27 Green Infrastructure in Bury St Edmunds

6.38 This policy sets out that in and around the town of Bury St Edmundsbury the integrity and connectivity of the strategic green infrastructure network will be maintained, protected and enhanced. This includes the creation of new habitats, through the implementation of the St Edmundsbury Green Infrastructure Strategy.

6.39 The policy has the potential for significant positive effects on a number of environmental objectives including the protection and enhancement of biodiversity as existing habitats will be protected and new habitats will be created, this would have a positive effect on SA objective 16, 'To conserve and enhance biodiversity and geodiversity'. Green infrastructure provision also has the potential for significant positive effects through its contribution to place making as far as rural areas are concerned, this would have a positive effect on SA objective 18, 'To conserve and enhance the quality and local distinctiveness of landscapes and townscapes'. In addition the policy has potential for significant positive effects due to the potential for green infrastructure to conserve and protect archaeological remains, this would have a positive effect on SA objective 17, 'To conserve and where appropriate enhance areas of historical and archaeological importance.'

6.40 From a social perspective, the policy has the potential for significant positive effects including the potential to contribute indirectly to improving health through providing opportunities for outdoor recreation, this would have a positive effect on SA objective 1 'To improve the health of the population overall and reduce health inequalities'. In addition, the provision of green infrastructure may contribute to improving the quality of where people live through improved permeability and links, both in rural areas and between urban areas and rural areas. This has the potential to enhance the connectivity between these areas and facilitate community interaction. This would have a positive

effect on SA objective 8 'To improve the quality of where people live and to encourage community participation'.

- 6.41 Improvements to green infrastructure will also have positive effects on water quality and air quality – SA objective 9 'To improve water and air quality'.
- 6.42 The policy is also assessed to deliver benefits against the SA economic objective 19 'To achieve sustainable levels of prosperity and economic growth', as the provision and enhancement of green infrastructure may increase the attractiveness of the area to visitors and tourists. There are also benefits in terms of maintaining healthy ecosystem services which provide the basis for the quality of life and prosperity in the longer term.
- 6.43 The full appraisal of the policy can be found in Table E7 in Appendix E.

Assessment of Strategic Sites Policies

- 6.44 The Bury St Edmunds Vision 2031 Submission Draft document contains five policies identifying the strategic sites in the town in line with the provisions of Policy CS11 of the Core Strategy. These policies relate to the following strategic sites:
- Policy BV3: Strategic Site – North West Bury St Edmunds;
 - Policy BV4: Strategic Site – Moreton Hall Bury St Edmunds;
 - Policy BV5: Strategic Site – West Bury St Edmunds;
 - Policy BV6: Strategic Site – North East Bury St Edmunds; and
 - Policy BV7: Strategic Site – South East Bury St Edmunds.
- 6.45 The assessment of these policies builds upon the previous SA work undertaken for the Core Strategy, the appraisal of the concept plan options and statements presented in section 5 and it takes on board the information pertaining to these areas set out in the Bury St Edmunds Vision Submission Draft document. The full assessment of the policies is presented in Appendix F, a summary is presented in Table 6.6 and a discussion of the results follows for each policy.

Table 6.6 –Strategic Mixed Use: Summary of Policy Assessments

| SA Objective | | North B4 West BV3 | Moreton Hall BV4 | West BV5 | NorthBV6 | South BV7 |
|--------------|---|----------------------|---------------------|-------------|----------|-----------|
| 1 | To improve the health of the population overall and reduce health inequalities | ++ | ++ | ++ | +++ | ++ |
| 2 | To maintain and improve levels of education and skills in the population overall | ++ | ++ | ++ | + | + |
| 3 | To reduce crime and anti-social activity | 0 | 0 | 0 | 0 | 0 |
| 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 | ++ | ++ | ++ | +++ | ++ |
| 9 | To improve water and air quality | - | - | +/- | +/- | - |
| 10 | To conserve soil resources and quality | -- | -- | -- | -- | -- |
| 11 | To use water and mineral resources efficiently, and re-use and recycle where possible | -- | -- | -- | -- | -- |
| 12 | To reduce waste | -- | -- | -- | -- | -- |
| 13 | To reduce the effects of traffic on the environment | + | + | ++ | ++ | + |
| 14 | To reduce contributions to climate change | +/- | +/- | +/- | + | +/- |
| 15 | To reduce vulnerability to climatic events | + | + | + | +++ | +/- |
| 16 | To conserve and enhance biodiversity and geodiversity | 0 | 0 | 0 | + | 0 |
| 17 | To conserve and where appropriate enhance areas of historical and archaeological importance | 0 | 0 | 0 | 0 | 0 |
| 18 | To conserve and enhance the quality and local distinctiveness of landscapes and townscapes | + | + | + | + | +/- |
| 19 | To achieve sustainable levels of prosperity and economic growth throughout the plan area | ++ | + | ++ | ++ | + |
| 20 | To revitalise town centres | ++ | ++ | ++ | 0 | ++ |
| 21 | To encourage efficient patterns of movement in support of economic growth | ++ | ++ | ++ | +++ | +++ |
| 22 | To encourage and accommodate both indigenous and inward investment | ++ | ++ | ++ | ++ | ++ |

Key:

| | |
|-----|---|
| +++ | Strongly positive |
| ++ | Moderately positive |
| + | Slightly positive |
| 0 | No effect |
| - | Slightly negative |
| -- | Moderately negative |
| --- | Strongly negative |
| +/- | Combination of positive and negative effects / neutral effect |

Policy BV3: Strategic Site – North West Bury St Edmunds

- 6.46 This policy identifies 76.5 Ha of land at North West Bury St Edmunds on the Policies Map for meeting the provisions of Policy CS11 of the Core Strategy and as detailed in the Concept Statement.
- 6.47 The appraisal of the policy (Table F1 in Appendix F) indicates that the allocation of this strategic site performs well against the SA social objectives due to the delivery of significant number of new housing (900 homes), including affordable housing, the site's proximity to the key services and facilities in the town centre, creation of the new local centre within the site, incorporation of a connecting bus route, pedestrian and cycle routes and amenity space, provision of new high quality strategic public open space and recreation facilities and a playing field, delivery of additional education, community and leisure facilities to meet the needs of this development. These provisions will help deliver benefits for public health, stimulate community interaction and cohesion, enable access to education and employment opportunities and improve the quality of the living environment.
- 6.48 From an environmental perspective, new development within this strategic site will result in a number of environmental effects on SA objectives relating to water, soil and air media and will lead to an increase in natural resources use and waste arisings generation. The development of the area would decrease the gap between Bury St Edmunds and Fornham All Saints, which may affect the distinctiveness of the village's character. However, the Core Strategy Policy CS11 requires that the identity and segregation of Fornham All Saints is maintained. The Concept Statement stipulates that this can be provided through the creation of an effective green buffer, achieving a balance between protecting the identity and integrity of the village and establishing a new neighbourhood for the town.
- 6.49 The policy delivers positive performance against the SA economic objectives as allocations of the strategic sites are likely to stimulate developers' interest and investment. This development should also provide opportunities for B1 use class local employment according to the Core Strategy Policy CS11. In addition, the support for sustainable modes of transport should encourage efficient patterns of movement in support of economic growth.

Recommendation

- 6.50 It is proposed that the supporting policy text could refer to the need to mitigate the loss of soil resources by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an afteruse appropriate to the soil's quality).

Policy BV4: Strategic Site – Moreton Hall Bury St Edmunds

- 6.51 This policy identifies 34.1 ha of land at Moreton Hall Bury St Edmunds which is allocated for development in accordance with the provisions of Policy CS11 of the Core Strategy and as detailed in the Concept Statement.
- 6.52 The appraisal of the policy (Table F2 in Appendix F) indicates that the allocation of this strategic site performs well against the SA social objectives due to the delivery of significant number of new housing (500 homes), including affordable housing, the site's proximity to the key services and facilities in the town centre, incorporation of public transport links, pedestrian and cycle routes and amenity space, provision of new high quality strategic public open space and recreation facilities, including the relocation of Bury Town Football Club (creating the football academy), delivery of additional community and leisure facilities to meet the needs of this development. These provisions will help deliver benefits for public health, stimulate community interaction and cohesion and

improve the quality of the living environment. The provision of an additional education facility (a secondary school) and being adjacent to the expanding Suffolk Business Park will enable access to education and provide immediate local employment opportunities.

- 6.53 From an environmental perspective, new development within this strategic site will result in a number of environmental effects on SA objectives relating to water, soil and air media and will lead to an increase in natural resources use and waste arisings generation. The development of this strategic site will not lead to the coalescence of the urban extension with nearby villages.
- 6.54 The policy delivers positive performance against the SA economic objectives, as allocations of the strategic sites are likely to stimulate developers' interest and investment. In addition, the support for sustainable modes of transport and the provision of the relief road providing access to the eastward extension to Suffolk Business Park should encourage efficient patterns of movement in support of economic growth.

Recommendation

- 6.55 It is proposed that the supporting policy text could refer to the need to mitigate the loss of soil resources by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an afteruse appropriate to the soil's quality).

Policy BV5: Strategic Site – West Bury St Edmunds

- 6.56 This policy identifies 54.3 Ha of land at West Bury St Edmunds which is allocated for development in accordance with the provisions of Policy CS11 of the Core Strategy and is identified on the Concept Statement.
- 6.57 The appraisal of the policy (Table F3 in Appendix F) indicates that the allocation of this strategic site performs well against the SA social objectives due to the delivery of significant number of new housing (450 homes), including affordable housing, accommodation of a sub-regional health campus (relocation of the West Suffolk Hospital), the site's proximity to the key services and facilities in the town centre, incorporation of public transport links, pedestrian and cycle routes, green corridors and amenity space, provision of new high quality strategic public open space and recreation facilities, contribution to the enhancement of the existing local community and education facilities to meet the needs of this development. These provisions will help deliver benefits for public health, help achieve positive integration with the wider area, stimulate community interaction and cohesion, enable access to education and employment opportunities and improve the quality of the living environment.
- 6.58 From an environmental perspective, new development within this strategic site will result in a number of environmental effects on SA objectives relating to water, soil and air media and will lead to an increase in natural resources use and waste arisings generation. However, the incorporation of cycling and walking links and green corridors provides opportunities for synergies with green infrastructure, delivering positive effects on the quality of the local environment and wildlife.
- 6.59 The development of the area would decrease the gap between Bury St Edmunds and Westley, which may affect the distinctiveness of the village's character. However, the Core Strategy Policy CS11 and the Concept Statement require that the identity and segregation of Westley is maintained. This will be done through the creation of an effective buffer, incorporating a new high quality public open space, green corridors and recreation facilities between the development and Westley. The development of the strategic site would also provide traffic relief for Westley in the form of a relief road to the east of the village. Therefore, this should help reduce the effects of road traffic on the environment.

- 6.60 The policy delivers positive performance against the SA economic objectives as allocations of the strategic sites are likely to stimulate developers' interest and investment. In addition, this strategic site will host a relocated hospital, a very large employer in the district, which will be retained. In addition, the support for sustainable modes of transport and the provision of the relief road connecting Westley Road with Newmarket road should encourage efficient patterns of movement in support of economic growth.

Recommendation

- 6.61 It is proposed that the supporting policy text could refer to the need to mitigate the loss of soil resources by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an afteruse appropriate to the soil's quality).

Policy BV6: Strategic Site – North East Bury St Edmunds

- 6.62 This policy identifies 66.5 Ha of land at North East Bury St Edmunds which is allocated for development in accordance with the provisions of Policy CS11 of the Core Strategy and as detailed in the Concept Statement.
- 6.63 The appraisal of the policy (Table F4 in Appendix F) indicates that the allocation of this strategic site performs well against the SA social objectives due to the delivery of significant number of new housing (1,250 homes), including affordable housing, the site's proximity to the key services and facilities in the town centre, provision of the new local centre, incorporation of public transport links, pedestrian and cycle routes and amenity space, provision of new high quality strategic public open space, green corridors and recreation facilities, delivery of additional education, community and leisure facilities to meet the needs of this development. These provisions will help deliver benefits for public health, stimulate community interaction and cohesion, enable access to education and employment opportunities and improve the quality of the living environment.
- 6.64 From an environmental perspective, new development within this strategic site will result in a number of environmental effects on SA objectives relating to water, soil and air media and will lead to an increase in natural resources use and waste arisings generation. The Core Strategy Policy CS11 and the Concept Statement require that the identity and segregation of Great Barton is maintained and a new, high quality, entrance to Bury St Edmunds is created. This will be achieved through a green buffer serving a dual role, being the separation between the urban edge of Bury St Edmunds and the village and also providing a new area of open space. The incorporation of green corridors provides opportunities for synergies with green infrastructure, delivering positive effects on the quality of the local environment and wildlife.
- 6.65 The policy delivers positive performance against the SA economic objectives as allocations of the strategic sites are likely to stimulate developers' interest and investment. This development should also provide opportunities for B1 use class local employment according to the Core Strategy Policy CS11. In addition, the support for sustainable modes of transport and the provision of an A143 Great Barton bypass aiming to reduce congestion should encourage efficient patterns of movement in support of economic growth.

Recommendation

- 6.66 It is proposed that the supporting policy text could refer to the need to mitigate the loss of soil resources by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an afteruse appropriate to the soil's quality).

Policy BV7: Strategic Site – South East Bury St Edmunds

- 6.67 This policy identifies 70 Ha of land at South East Bury St Edmunds which is allocated in for development in accordance with the provisions of Policy CS11 of the Core Strategy and as detailed in the Concept Statement.
- 6.68 The appraisal of the policy (Table F5 in Appendix F) indicates that the allocation of this strategic site performs well against the SA social objectives due to the delivery of significant number of new housing (1,250 homes), including affordable housing, the site's proximity to the key services and facilities in the town centre, creation of new community and local centres, incorporation of public transport links, pedestrian and cycle routes and amenity space, provision of new high quality strategic public open space and recreation facilities, delivery of additional education, community and leisure facilities, accommodation of two small-scale employment areas on site to meet the needs of this development. These provisions will help deliver benefits for public health, stimulate community interaction and cohesion, enable access to education and employment opportunities and improve the quality of the living environment. The proximity of Nowton Park to the south west of the site will provide access to a significant informal parkland recreation facility.
- 6.69 From an environmental perspective, new development within this strategic site will result in a number of environmental effects on SA objectives relating to water, soil and air media and will lead to an increase in natural resources use and waste arisings generation.
- 6.70 On the positive side, the development of this strategic site should contribute to reducing congestion at appropriate junctions on the A14 in Bury St Edmunds and delivering a relief road that reduces levels of through traffic using the A134 Rougham Road and Sicklesmere Road. This will help improve efficiency of movement and minimise the effects of traffic on the environment.
- 6.71 Some of the development area is in flood zone. The Core Strategy Policy 11 requires that the development area makes a positive contribution to reducing the potential for flooding both in the area and downstream in the Lark Valley. The concept statement stipulates that a continuous riverside walk should be provided, acting as a green corridor linking a series of open spaces, tree belts and plantations, with potential to enhance the biodiversity of the area. These open spaces should link in with existing open space and river corridor beyond the site, in accordance with the green infrastructure Strategy.
- 6.72 Part of the strategic site lies within Special Landscape Area. The Core Strategy Policy CS11 requires that the development positively uses the framework for new development provided by the existing natural environment and character of the area including maintaining significantly important open spaces that provide the setting of the historic centre. The concept statement further details landscape context, constraints and opportunities for improving the local environment and minimising effects on the surroundings.
- 6.73 Another constraint is the area's location within an Area of Archaeological Importance.
- 6.74 The policy delivers positive performance against the SA economic objectives as allocations of the strategic sites are likely to stimulate developers' interest and investment. In addition, the support for sustainable modes of transport and delivering a relief road that reduces levels of through traffic using the A134 Rougham Road and Sicklesmere Road should encourage efficient patterns of movement in support of economic growth.

Recommendation

- 6.75 It is proposed that qualified historic environment consultants should be involved in the development of the site's masterplan to undertake a systematic archaeological assessment.

- 6.76 It is also proposed that the supporting policy text could refer to the need to mitigate the loss of soil resources by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an afteruse appropriate to the soil's quality).

Assessment of Town Centre Masterplan Policy BV28

- 6.77 The Bury St Edmunds Vision 2031 Submission Draft document contains Policy BV28 identifying the Bury St Edmunds Town Centre Masterplan in line with the provisions of Policy CS10 of the Core Strategy.
- 6.78 The Bury St Edmunds Town Centre is identified as a suitable location for regeneration and new development. The amount of land available for development, including appropriate adjoining sites that will support the regeneration objectives, the location and distribution of uses, access arrangements, design and landscaping will be informed by a Masterplan and subsequent individual site development briefs, which will be adopted as guidance.
- 6.79 The full assessment of the policy is presented in Appendix F. A summary is presented in the table below and a discussion of the results follows.

Table 6.7 - Town Centre Masterplan: Summary of Policy BV28 Assessment

| SA Objective | | Town Centre BV29 |
|--------------|---|------------------|
| 1 | To improve the health of the population overall and reduce health inequalities | + |
| 2 | To maintain and improve levels of education and skills in the population overall | + |
| 3 | To reduce crime and anti-social activity | 0 |
| 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 | 0 |
| 8 | To improve the quality of where people live and to encourage community participation | ++ |
| 9 | To improve water and air quality | +/- |
| 10 | To conserve soil resources and quality | + |
| 11 | To use water and mineral resources efficiently, and re-use and recycle where possible | -- |
| 12 | To reduce waste | -- |
| 13 | To reduce the effects of traffic on the environment | + |
| 14 | To reduce contributions to climate change | +/- |
| 15 | To reduce vulnerability to climatic events | +++ |
| 16 | To conserve and enhance biodiversity and geodiversity | - |
| 17 | To conserve and where appropriate enhance areas of historical and archaeological importance | - |
| 18 | To conserve and enhance the quality and local distinctiveness of landscapes and townscapes | + |
| 19 | To achieve sustainable levels of prosperity and economic growth throughout the plan area | ++ |
| 20 | To revitalise town centres | ++ |
| 21 | To encourage efficient patterns of movement in support of economic growth | ++ |
| 22 | To encourage and accommodate both indigenous and inward investment | ++ |

Key:

| | |
|-----|---|
| +++ | Strongly positive |
| ++ | Moderately positive |
| + | Slightly positive |
| 0 | No effect |
| - | Slightly negative |
| -- | Moderately negative |
| --- | Strongly negative |
| +/- | Combination of positive and negative effects / neutral effect |

Assessment Results

- 6.80 This policy identifies the Bury St Edmunds Town Centre Masterplan on the Policies Map for meeting the provisions of Policy CS10 of the Core Strategy.
- 6.81 The appraisal of the policy (Table F2 in Appendix F) indicates that the town centre performs well against the SA social objectives as it provides a focus for new retail, leisure, cultural and office development that is important for ensuring that the town centre continues to remain vibrant and attractive location.
- 6.82 The policy identifies the area for future development and regeneration with good access to a range of key services and health facilities along with good public transport links, pedestrian and cycle routes and amenity space. These provisions will help meet the needs of the development, deliver benefits for public health, stimulate community interaction and cohesion, enable access to education, cultural and employment opportunities and improve the quality of the living environment.
- 6.83 From an environmental perspective, new development within the masterplan area will result in a number of environmental effects on SA objectives relating to water, soil and air media and will lead to an increase in natural resources use and waste arisings generation. However, by providing the context for the future development the Masterplan is likely to improve the quality of the townscape.
- 6.84 The town centre development area is within 1.5km of a SSSI (The Glen Chalk Caves) and within an Area identified as Archaeological Importance and there are some listed buildings within the development area. The design and development of the area will be sympathetic to these sensitive ecological and heritage features and any potential adverse effects will be mitigated.
- 6.85 The policy delivers positive performance against the SA economic objectives, as development of the masterplan area is likely to stimulate developers' interest and investment in the area. This development should provide opportunities for a range of local employment, with a particular focus on office and retail related employment. In addition, the support for sustainable modes of transport through adherence to the Core Strategy Policy 10 should encourage efficient patterns of movement in support of economic growth.

Recommendations

- 6.86 Effective implementation of CS Policy 10 and Development Management Policies should ensure that the necessary environmental safeguards are in place and that targets for high quality construction and design are achieved.
- 6.87 In addition, the 2012 SA Report recommended that qualified ecologists and landscape architects should be closely involved in the development of the site's masterplan to ensure the incorporation of appropriate structural landscape and ecological measures to enhance habitats on site. The site's masterplan should also detail how the protection of nearby listed buildings will be achieved. This would help enhance the policy's performance against the SA environmental objectives. The Council has noted these recommendations in terms of the process to be followed.

- 6.88 Further, it is recommended that qualified historic environment consultants should be involved in the development of the site's masterplan to undertake a systematic archaeological assessment.

Assessment of Policies Relating to Development Sites (other than Strategic Sites)

- 6.89 The Bury St Edmunds Vision 2031 Submission Draft document contains 15 policies allocating sites for residential, employment, mixed use, local centres and community facilities and special uses in Bury St Edmunds and immediate surroundings. These policies are, BV8, BV9, BV10, BV11, BV12, BV13, BV14, BV15, BV16, BV17, BV21, BV22, BV24 and BV25. Policy BV13 allocates one strategic employment site that has been designated in Policy CS9 of the St Edmundsbury adopted Core Strategy in land to the east of the Suffolk Business Park in Bury St Edmunds.
- 6.90 Tables 6.10 to 6.13 provide summary overviews of the results of the assessments for proposed allocations of residential/mixed and employment sites in Other Residential/Mixed Use Sites, Other Employment Sites, Local Centres Sites and Other Uses Sites. A discussion of the assessment results for each policy is presented below.

Policy BV8 Station Hill Development Area

- 6.91 Policy BV8 identifies one site for residential mixed use development. The site is allocated for redevelopment that should seek to deliver the following; residential (300 units indicative), offices and other B1 employment, leisure uses, small scale retail, parking, improved public transport interchange and strategic landscaping and public realm improvements.
- 6.92 The site has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F7). The overall potential effects of the Policy BV8 are summarised below.

General Assessment of Policy BV8 and proposed mixed use development site against the Sustainability Objectives

Positive effects

- Objective 1: To improve health of the population overall and reduce health inequalities - The site is within a reasonable walking/cycling distance of a GP's surgery and dental facilities and has access to hospital facilities within 30 minutes by public transport.
- Objective 2: To maintain and improve levels of education and skills in the population overall - The town has primary schools and secondary with spare capacity and is within a 30 minute bus journey to secondary schools. The site is within a 15 minute walk of the primary school and is easily cyclable and has access to upper schools by public transport.
- Objective 5: To improve access to key services for all sectors of the population - Bury St Edmunds benefits from an excellent range of key services, shops and supermarkets. The site provides a mixed-use development
- Objective 6: To offer everybody the opportunity for rewarding and satisfying employment – The site provides mixed-use development and employment opportunities.

- Objective 7: To meet the housing requirements of the whole community – The policy benefits this objective as it allocates one site for residential development. All of them will therefore provide a proportion of new affordable housing in accordance with the Core Strategy requirements.
- Objective 8: To improve the quality of where people live and encourage community participation - The site is within close proximity to areas of green space.
- Objective 10: To conserve soil resources and quality- The site is brownfield land and previously developed land.
- Objective 13: To reduce the effects of traffic on the environment: The site has good access to the local facilities in the town, which reduces the need for unnecessary trips by private vehicle.
- Objective 15: To reduce vulnerability to climatic events: The site is not located within a flood zone and is not within 9m of a river corridor.
- Objective 17 – To conserve and where appropriate enhance areas of historical and archaeological importance – There are no heritage constraints on the site.
- Objective 18: To conserve and enhance the quality and local distinctiveness of landscapes and townscapes - The site is not within a Green Corridor and will not lead to coalescence of the urban extension with nearby villages. In addition, the policy requires strategic landscaping and open space be provided to address the individual site requirements and location.
- Objective 21: To encourage efficient patterns of movement in support of economic growth: The site is located within five minutes of a bus stop. The site is well located to access services and facilities within the town.
- Positive effects have been predicted for economic objectives 19 - 22 (sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment). As Policy BV11 provides mixed use development and employment opportunities it delivers beneficial effects across all SA economic objectives.

Negative effects

- Objective 9: To improve water and air quality – BV8 Station Hill is located within a groundwater source protection zone 1 and within a major aquifer area (i.e. providing a high level of water storage).
- Objective 16: To conserve and enhance biodiversity and geodiversity – BV8 Station Hill is within 1.5km of Glen Chalk Caves SSSI.

Policy Assessment Summary

- 6.93 Policy BV8 performed well in the assessment providing a mixed use development site. The site provides a good level of access to key local services, provides access to areas of green space that promote recreational opportunities and employment opportunities.
- 6.94 The key constraints on the site relate to environmental constraints. Allocation BV8 is within 1.5km of Glen Chalk Caves SSSI and within a groundwater source protection zone 1.

Recommendations

- 6.95 The supporting text should consider that the design and development of new sites so that they are sympathetic to the sensitive environmental feature of the SSSI and any potential adverse effects should be mitigated. The policy supporting text should also specify which environmental constraints should be considered, including water quality.

Policy BV9 Tayfen Road

6.96 Policy BV9 identifies one site for mixed use development. The site will provide for a variety of uses that could include retail warehousing, food stores, leisure uses, residential (150 units indicative) and strategic landscaping and public realm improvements. The site has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F9). The overall potential effects of the Policy BV9 are summarised below.

General Assessment of Policy BV9 and proposed mixed use development site against the Sustainability Objectives

Positive effects

- Objective 1: To improve health of the population overall and reduce health inequalities - The site is within a reasonable walking/cycling distance of a GP's surgery and dental facilities and has access to hospital facilities within 30 minutes by public transport.
- Objective 2: To maintain and improve levels of education and skills in the population overall - The town has primary schools and secondary with spare capacity and is within a 30 minute bus journey to secondary schools. The site is within not within 800m walk of the primary school but is within 5km cycling distance and is accessible to upper schools within Bury St Edmunds by public transport.
- Objective 5: To improve access to key services for all sectors of the population - Bury St Edmunds benefits from an excellent range of key services, shops and supermarkets. The site provides a mixed-use development.
- Objective 6: To offer everybody the opportunity for rewarding and satisfying employment – The site provides mixed-use development and employment opportunities.
- Objective 7: To meet the housing requirements of the whole community – The policy benefits this objective as it allocates one site for residential development. All of them will therefore provide a proportion of new affordable housing in accordance with the Core Strategy requirements.
- Objective 8: To improve the quality of where people live and encourage community participation - The site is within close proximity to areas of green space.
- Objective 10: To conserve soil resources and quality- The site is brownfield land and previously developed land.
- Objective 13: To reduce the effects of traffic on the environment: The site has good access to the local facilities in the town, which reduces the need for unnecessary trips by private vehicle.
- Objective 15: To reduce vulnerability to climatic events: The site is not located within a flood zone and is not within 9m of a river corridor.
- Objective 18: To conserve and enhance the quality and local distinctiveness of landscapes and townscapes - The site is not within a Green Corridor and will not lead to coalescence of the urban extension with nearby villages. In addition, the policy requires strategic landscaping and open space be provided to address the individual site requirements and location.
- Objective 21: To encourage efficient patterns of movement in support of economic growth: The site is located within five minutes of a bus stop. The site is well located to access services and facilities within the town.
- Positive effects have been predicted for economic objectives 19 - 22 (sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward

investment). As Policy BV11 provides mixed use development and employment opportunities it delivers beneficial effects across all SA economic objectives.

Negative effects

- Objective 9: To improve water and air quality – BV9 Tayfen Road is located within a groundwater source protection zone 1 and within a major aquifer area (i.e. providing a high level of water storage).
- Objective 16: To conserve and enhance biodiversity and geodiversity- The site is within 1.5km of a SSSI (The Glen Chalk Caves). However, it is not located in proximity to a SAC or SPA.
- Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance- There are no listed buildings on or adjacent to the site and the site is not within or adjacent to a conservation area or a Historic Park and Garden. However, the site is located in close proximity (less than 40metres) to a SM.

Policy Assessment Summary

- 6.97 Policy BV9 performed relatively well in the assessment providing a mixed use development site. The site provides a good level of access to key local services, provides access to areas of green space that promote recreational opportunities and employment opportunities.
- 6.98 Allocation BV9 is within 2km of Glen Chalk Caves SSSI and it is located in close proximity to Local Nature Reserve (Moreton Hall Community Woods). In addition, the site is in close proximity to a Scheduled Monument (SM). Therefore the future design and development of the site will need to be sympathetic to these environmental and historic features.

Recommendations

- 6.99 The 2012 SA recommended that the policy supporting text should consider that the design and development of new sites so that they are sympathetic to the sensitive environmental and heritage features, including the SSSI and SM and any potential adverse effects should be mitigated. These recommendations have been incorporated in the updated Plan, improving its sustainability performance.

Policy BV10 Housing on Brownfield Sites

- 6.100 Policy BV10 identifies eight areas designated for residential development on brownfield land and one area for mixed use development (that includes residential development) on brownfield land. The proposed allocations in strategic sites are shown in Table 6.8.

Table 6.8 - Proposed allocations in Housing on Brownfield Sites

| Site Reference Number | Proposed allocations | Size of site (ha) | Use | Total number of homes | Type of site |
|-----------------------|-------------------------------|-------------------|-----------------|-----------------------|--------------|
| BV10a | Bury St Edmunds Garden Centre | 1.75 | Residential use | 30 | Brownfield |
| BV10b | Bury St Edmunds Garden Centre | 2.0 | | 30 | Brownfield |
| BV10c | Hospital Site, Hospital Road | 1.5 | | 45 | Brownfield |
| BV10d | Shire Hall | 1.3 | | 25 | Brownfield |
| BV10e | Weymed Site | 0.27 | | 14 | Brownfield |
| BV10f | Land at School Yard | 0.64 | | 32 | Brownfield |
| BV10g | Almoners Barn, Cullum Road | 0.24 | | 12 | Brownfield |
| BV10h | Garages and | 0.7 | Mixed use | 50 | Brownfield |

| Site Reference Number | Proposed allocations | Size of site (ha) | Use | Total number of homes | Type of site |
|-----------------------|------------------------|-------------------|--|-----------------------|--------------|
| | Bus Depot, Cotton Lane | | (residential, employment, community and social facilities) | | |

6.101 Each of these sites has been subject to a detailed appraisal, the results of which are shown in Appendix F (Tables F10 - F17). The overall potential effects of the Policy BV10 are summarised below:

General Assessment of Policy BV10 and proposed residential development site against the Sustainability Objectives

Positive effects

- Objective 1: To improve health of the population overall and reduce health inequalities - The site allocations are within a reasonable walking/cycling distance of a GP's surgery and dental facilities and has access to hospital facilities within 30 minutes by public transport.
- Objective 2: To maintain and improve levels of education and skills in the population overall - The town has primary schools and secondary with spare capacity and is within a 30 minute bus journey to secondary schools. The site allocations are within a 15 minute walk and cyclable distance of primary schools and have access to uppers schools by public transport.
- Objective 7: To meet the housing requirements of the whole community – The policy benefits this objective as it allocates one site for residential development. All of them will therefore provide a proportion of new affordable housing in accordance with the Core Strategy requirements.
- Objective 8: To improve the quality of where people live and encourage community participation - The site allocations are within close proximity to areas of green space.
- Objective 13: To reduce the effects of traffic on the environment: The site allocations have good access to the local facilities in the town, which reduces the need for unnecessary trips by private vehicle.
- Objective 18: To conserve and enhance the quality and local distinctiveness of landscapes and townscapes - The site allocations are not within a Green Corridor and will not lead to coalescence of the urban extension with nearby villages. In addition, the policy requires strategic landscaping and open space be provided to address the individual site requirements and location.
- Objective 21: To encourage efficient patterns of movement in support of economic growth: The site is located within five minutes of a bus stop. The site allocations are well located to access services and facilities within the town.
- Positive effects have been predicted for economic objectives 19 - 22 (sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment). As allocation BV10h provides mixed use development and employment opportunities they deliver beneficial effects across all SA economic objectives.

Negative effects

- Objective 9: To improve water and air quality – Allocations BV10b, BV10c, BV10d, BV10e, BV10f, BV10g and BV10h are located within a groundwater source protection zone 1 and within a major aquifer area (i.e. providing a high level of water storage). In addition, allocation BV10a is located within a groundwater source protection zone 2

and within a major aquifer area (i.e. providing a high level of water storage). Therefore for these allocations supporting text should specify which environmental considerations should be met – this should include water quality and mitigating potential negative effects on water availability.

- Objective 15: To reduce vulnerability to climatic events: The allocations BV10b and BV10d, BV10e, BV10g, BV10h are located in Flood Zone 2.
- Objective 16: To conserve and enhance biodiversity and geodiversity - Allocations BV10d, BV10e, BV10f and BV10h are within 2km of Glen Chalk Caves SSSI.
- Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance- Allocations BV10d, BV10e, BV10f and BV10h have listed buildings adjacent to their sites and within an Area identified as Archaeological Importance. In addition, BV10g is located within an Area identified as Archaeological Importance.

Mixed effects

- Objective 10: To conserve soil resources and quality – All of the allocations are designated on brownfield sites. For Allocation BV10b there is some greenfield land, although this is designated as urban land.

Policy Assessment Summary

- 6.102 Policy BV10 performed relatively well in the assessment providing sites for residential and mixed use development on brownfield land. All the allocated sites provides a good level of access to key local services and schools as well as providing access to areas of green space that promote recreational opportunities. In addition, the mixed use sites provide employment opportunities.
- 6.103 The key constraints on the site relate to environmental, flooding and heritage constraints. Site allocations BV10b and BV10d, BV10e, BV10g, BV10h are located in Flood Zone 2. In addition, site allocation BV10j is located with both Flood zones 2 and 3. Allocations BV10d, BV10e, BV10f and BV10h are within 2km of Glen Chalk Caves SSSI.
- 6.104 Allocations BV10d, BV10e, BV10f and BV10h have listed buildings adjacent to their sites and are within an Area identified as Archaeological Importance. Allocation BV10g is located within an Area identified as Archaeological Importance as well.

Recommendations

- 6.105 The 2012 SA recommended that the policy supporting text should consider that the design and development of new sites so that they are sympathetic to the sensitive environmental and heritage features, including the SSSI, SM and Area of Archaeological Importance and nearby listed buildings and any potential adverse effects should be mitigated.
- 6.106 It was also recommended that the supporting text should consider that flood mitigation measures in advance of development of the site where necessary.
- 6.107 The updated policy supporting text incorporates these recommendations.
- 6.108 Further, it is recommended that qualified historic environment consultants should be involved in the development of the sites within Areas of Archaeological Importance to undertake a systematic archaeological assessment.

Policy BV11 Land at Ram Meadow

- 6.109 Policy BV11 identifies one site for mixed use development. This site will support a variety of uses that could include residential uses, commercial uses and car parking. The site has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F18). The overall potential effects of the Policy BV11 are summarised below.

General Assessment of Policy BV11 and proposed mixed use development site against the Sustainability Objectives

Positive effects

- Objective 2: To maintain and improve levels of education and skills in the population overall - The town has primary schools and secondary with spare capacity and is within a 30 minute bus journey to secondary schools. The site is within a 15 minute walk of the primary school and is easily cyclable and has access to upper schools by public transport.
- Objective 5: To improve access to key services for all sectors of the population - Bury St Edmunds benefits from an excellent range of key services, shops and supermarkets. The site provides a mixed-use development.
- Objective 6: To offer everybody the opportunity for rewarding and satisfying employment – The site provides mixed-use development and employment opportunities.
- Objective 7: To meet the housing requirements of the whole community – The policy benefits this objective as it allocates one site for residential development. All of them will therefore provide a proportion of new affordable housing in accordance with the Core Strategy requirements.
- Objective 8: To improve the quality of where people live and encourage community participation - The site is within close proximity to areas of green space.
- Objective 10: To conserve soil resources and quality- The site is brownfield land and previously developed land.
- Objective 13: To reduce the effects of traffic on the environment: The site has good access to the local facilities in the town, which reduces the need for unnecessary trips by private vehicle.
- Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance- There are no listed buildings on or adjacent to the site and the site is not within or adjacent to a conservation area or a Historic Park and Garden. The site is not located in proximity to a SM or near an Area identified as Archaeological Importance.
- Objective 18: To conserve and enhance the quality and local distinctiveness of landscapes and townscapes - The site is not within a Green Corridor and will not lead to coalescence of the urban extension with nearby villages. In addition, the policy requires strategic landscaping and open space be provided to address the individual site requirements and location.
- Objective 21: To encourage efficient patterns of movement in support of economic growth: The site is located within five minutes of a bus stop. The site is well located to access services and facilities within the town.
- Positive effects have been predicted for economic objectives 19 - 22 (sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment). As Policy BV11 provides mixed use development and employment opportunities it delivers beneficial effects across all SA economic objectives.

Negative effects

- Objective 9: To improve water and air quality – BV11 Land at Ram Meadow is located within a groundwater source protection zone 1 and within a major aquifer area (i.e. providing a high level of water storage). Therefore, Policy BV11 supporting text

should specify which environmental considerations should be met – this should include water quality and mitigating potential negative effects on water availability.

- Objective 15: To reduce vulnerability to climatic events: The site is located within Flood Zones 2 and 3 and may be susceptible to flooding. Mitigation measures should be considered and implemented for new development within the site where necessary. The policy includes a requirement for a flood risk assessment.
- Objective 16: To conserve and enhance biodiversity and geodiversity- The site is within 1.5km of a SSSI (The Glen Chalk Caves), however it is not located in proximity to a SAC or SPA. The provision of an access road identified in Policy BV11 would impact on BAP species/habitats.

Mixed effects

- Objective 1: To improve health of the population overall and reduce health inequalities - The site is within a reasonable walking/cycling distance of a GP's surgery and dental facilities and has access to hospital facilities within 30 minutes by public transport. However, the site will also result in the loss of open access land for a road and also result in the loss of a football pitch.

Policy Assessment Summary

- 6.110 Policy BV11 performed relatively well in the assessment providing a mixed use development site. The site provides a good level of access to key local services, provides access to areas of green space that promote recreational opportunities and employment opportunities.
- 6.111 The key constraints on the site relate to flooding issues. Allocation BV11 is within Flood Zones 2 and 3 and may be susceptible to flooding. Mitigation measures should be considered and implemented for new development within the site where necessary.

Recommendations

- 6.112 The 2012 SA recommended that the policy supporting text should refer to the need for flood mitigation measures and mitigation of effects on the water quality and availability in advance of the development of the site where necessary. The updated policy supporting text incorporates these recommendations.

Policy BV12 New and Existing Local Centres and Community Facilities

- 6.113 Policy BV12 identifies 13 areas designated as new and existing local centres. These allocations can provide for a range of uses that could include leisure and recreation, health and community facilities, small scale retail development and education uses and will be safeguarded from other forms of development.

Table 6.9 - Proposed allocations in new and existing local centres and community facilities

| Site Reference Number | Proposed allocations | Use | Type of site |
|-----------------------|-------------------------|---|--------------|
| BV12a | Barton Road | Existing Local Centre (range of uses that could include leisure and recreation, health and community facilities, small scale retail development and education uses) | Brownfield |
| BV12b | Cardogan Road | | Brownfield |
| BV12c | Glastonbury Court | | Brownfield |
| BV12d | Hardwick Precinct | | Brownfield |
| BV12e | Lake Avenue Parade | | Brownfield |
| BV12f | Moreton Hall | | Brownfield |
| BV12g | The Parade, Ridley Road | | Brownfield |
| BV12h | St Olaves Precinct | | Brownfield |

| Site Reference Number | Proposed allocations | Use | Type of site |
|-----------------------|---|--|--------------|
| BV12i | Stamford Court | | Brownfield |
| BV12j | North East Bury St Edmunds strategic site | New Local Centre (range of uses that could include leisure and recreation, health and community facilities, small scale retail development and education uses) | Greenfield |
| BV12k | Moreton Hall strategic site | | Greenfield |
| BV12l | North East Bury St Edmunds strategic site | | Greenfield |
| BV12m | South East Bury St Edmunds strategic site | | Greenfield |

- 6.114 The locations and mix of uses of the new local centres will be identified through the masterplan process.
- 6.115 New local centres should be well served by public transport and cycle path access and within reasonable walking distance of all parts of the development.
- 6.116 Each of the existing local centres has been subject to a detailed appraisal, the results of which are shown in Appendix F (Tables F31 - F39). The new local centres are assessed as part of the strategic site concept statements in Appendix F (Tables F1 - F5). The overall potential effects of the Policy BV12 are summarised below:

General Assessment of Policy BV12 and existing and proposed local centres and community facilities development site against the Sustainability Objectives

Positive effects

- Positive effects have been predicted for economic objectives 19 - 22 (sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment). As Policy BV12 safeguards employment areas designations it delivers beneficial effects across all SA economic objectives.
- Objective 15: To reduce vulnerability to climatic events: The site is not located within a flood zone and is not within 9m of a river corridor.
- Objective 16: To conserve and enhance biodiversity and geodiversity- The site is not located near any SPA, SAC or SSSI, nor within 500m from a county Wildlife sites. There are no BAP habitats nor geological SSSI or RIGS on the site.

Negative effects

- Objective 9: To improve water and air quality – Allocations BV12a, BV12d, BV12f, BV12h, BV12i are located within a groundwater source protection zone 1 and within a major aquifer area (i.e. providing a high level of water storage). In addition, allocation BV12b is located within a groundwater source protection zone 2 and within a major aquifer area (i.e. providing a high level of water storage). Therefore for these allocations supporting text should specify which environmental constraints should be considered – this should include water quality and water availability.
- Objective 16: To conserve and enhance biodiversity and geodiversity – BV12a, BV12f, BV12i is within 2km of Glen Chalk Caves SSSI and is within approximately 500m of the Local Nature Reserve, Moreton Hall Community Woods.
- Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance - Allocation BV12f is located in close proximity to listed buildings.

Policy Assessment Summary

- 6.117 Policy BV12 performed relatively well in the assessment providing 9 sites designated as existing local centres. The allocations support sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment.
- 6.118 The key constraints on the site relate to environmental and heritage constraints. Allocations BV12a, BV12f, BV12i is within 2km of Glen Chalk Caves SSSI and is within approximately 500m of the Local Nature Reserve, Moreton Hall Community Woods In addition, BV12f is located in close proximity to listed buildings.

Recommendations

- 6.119 The 2012 SA recommended that the policy supporting text should consider that the design and development of new sites so that they are sympathetic to the sensitive environmental and heritage features, including the SSSI, Local Nature Reserve and nearby listed buildings and any potential adverse effects should be mitigated.
- 6.120 The updated policy supporting text incorporates these recommendations.

Policy BV13 Strategic Site – Extension to Suffolk Business Park, Moreton Hall

- 6.121 Policy BV13 identifies one site for employment uses (Use Classes B1 and B8). The site has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F19). The overall potential effects of the Policy BV13 are summarised below.

General Assessment of Policy BV13 and proposed employment site against the Sustainability Objectives

Positive effects

- Positive effects have been predicted for economic objectives 19 - 22 (sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment). As Policy BV13 safeguards employment areas designations it delivers beneficial effects across all SA economic objectives.
- Objective 15: To reduce vulnerability to climatic events: The site is not located within a flood zone and is not within 9m of a river corridor.
- Objective 16: To conserve and enhance biodiversity and geodiversity- The site is not located near any SPA, SAC or SSSI, nor within 500m from a county Wildlife sites. There are no BAP habitats nor geological SSSI or RIGS on the site.

Negative effects

- Objective 9: To improve water and air quality – BV13 is located within a groundwater source protection zone 2 and within a major aquifer area (i.e. providing a high level of water storage). Therefore, Policy BV13 supporting text should specify which environmental constraints should be considered – this should include water quality and water availability.
- Objective 10: To conserve soil resources and quality – Allocation BV13 is located on greenfield land and is identified as Grade 2 agricultural land. Therefore, Policy BV13 should specify the environmental considerations – this should cover valuable agricultural land.
- Objective 13: To reduce the effects of traffic on the environment - The commercial units are provisionally indicated for class B1 and B8 business uses. This is likely to

involve deliveries by Heavy Goods Vehicles (HGVs), which could contribute to level of traffic and impact on the environment.

- Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance – Although for allocation BV13 there are no listed buildings located on the site, there are some in close proximity to the site boundary.

Mixed effects

- Objective 12: To reduce waste - Trends for commercial and industrial (C&I) waste show an overall increase of waste arisings in Suffolk; and although a proportion of C&I waste landfilled has decreased and a proportion of recycling/composting increased, absolute volumes have grown for both categories. Whilst new and existing employment development will generate additional waste, proposals will be expected to meet requirements of Core Strategy Policy CS2 and will also be subject to corporate policies' requirements and financial incentives.

Policy Assessment Summary

- 6.122 Policy BV13 performed relatively well against the SA framework, although some of the sustainability objectives were not applicable to the sites considered within this policy due to their specific nature.
- 6.123 The key constraints on the site relate to heritage and environmental constraints, as there are some listed buildings in close proximity to the site. Therefore the future design and development of the site will need to be sympathetic to these environmental and historic features. The site is also designated as greenfield land, which would result in the loss of Grade 2 agricultural land.

Recommendations

- 6.124 The 2012 SA recommended that the policy supporting policy text should consider the design and development of new sites so that they are sympathetic to the sensitive heritage features and any potential adverse effects should be mitigated.
- 6.125 The updated policy supporting text incorporates these recommendations.
- 6.126 It is further proposed that the supporting policy text could refer to the need to mitigate the loss of soil resources by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an after-use appropriate to the soil's quality).

Policy BV14 General Employment Areas

- 6.127 Policy BV14 identifies 14 areas designated for employment (Use Classes B1, B8 and B2). These are:
- BV14a – Anglian Lane (B1, B8)
 - BV14b – Barton Road (B1, B8)
 - BV14c – Blenheim Park (B1, B2, B8)
 - BV14d – British Sugar, Hollow Road (B1, B2, B8)
 - BV14e – Suffolk Business Park (B1, B8)
 - BV14f – Chapel Pond Hill (B1, B2, B8)
 - BV14g – Eastern Way (B1, B2, B8)
 - BV14h – Enterprise Park, Etna Road (B1, B8)
 - BV14i – Mildenhall Road (B1, B2, B8)
 - BV14j – Moreton Hall (B1, B2, B8)

- BV14k – Northern Way (B1, B2, B8)
- BV14l – Western Way (B1, B2, B8)
- BV14m – Greene King, Friars Lane (B1, B2, B8)
- BV15n – Rougham (B1, B2, B8)

6.128 Seven of the fourteen allocations have land available for development (BV14a, BV14c, BV14e, BV14f, BV14g, BV14i and BV14k). Each of these seven sites has been subject to a detailed appraisal, the results of which are shown in Appendix F (Tables F20 – F27). The overall potential effects of the Policy BV14 and its allocated sites are summarised below:

General Assessment of Policy BV14 and proposed employment sites against the Sustainability Objectives

Positive effects

- Positive effects have been predicted for economic objectives 19 - 22 (sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment). As Policy BV14 safeguards employment areas designations it delivers beneficial effects across all SA economic objectives.
- Objective 15: To reduce vulnerability to climatic events: The site is not located within a flood zone and is not within 9m of a river corridor.
- Objective 16: To conserve and enhance biodiversity and geodiversity- The site is not located near any SPA, SAC or SSSI, nor within 500m from a county Wildlife sites. There are no BAP habitats nor geological SSSI or RIGS on the site.

Negative effects

- Objective 9: To improve water and air quality – Allocations BV14f, BV14g, BV14i are located within a groundwater source protection zone 1 and within a major aquifer area (i.e. providing a high level of water storage). In addition, allocation BV14a, BV14c, BV14e is located within a groundwater source protection zone 2 and within a major aquifer area (i.e. providing a high level of water storage). Therefore for these allocations supporting text should specify which environmental considerations should be met – this should include water quality and mitigating potential negative effects on water availability.
- Objective 16: To conserve and enhance biodiversity and geodiversity – BV14a, BV14e, BV14f are within 2km of Glen Chalk Caves SSSI.

Mixed Use effects

- Objective 15: To reduce vulnerability to climatic events: Allocation BV14g is adjacent to the River and flood zone around its valley and is located within Flood Zone 3. However, the employment uses represents a 'less vulnerable' use in terms of flood risk.

Policy Assessment Summary

6.129 Policy BV14 performed relatively well in the assessment providing 7 out of 13 sites with land available for development. The allocations support sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment.

6.130 The key constraints on the sites relate to environment issues. Allocations BV14a, BV14e, BV14f are within 2km of Glen Chalk Caves SSSI. Mitigation measures should be considered and implemented for new development within the site where necessary.

Recommendations

- 6.131 The 2012 SA recommended that the policy supporting text should consider that the design and development of new sites so that they are sympathetic to the sensitive environmental and heritage features, including the SSSI, Local Nature Reserve and nearby listed buildings and any potential adverse effects should be mitigated.
- 6.132 It was also recommended that the supporting policy text should consider the water quality and mitigating potential negative effects on water availability in advance of the development of the site where necessary.
- 6.133 The updated policy supporting text incorporates these recommendations.

Policy BV15 Alternative Business Development within General Employment Areas

- 6.134 Policy BV15 identifies 7 sites for employment for redevelopment or re-use of sites and buildings for alternative commercial business/mixed activities which do not necessarily fit neatly into B Use Classes. These allocations include the following:
- BV15a – Barton Road
 - BV15b – Blenheim Park
 - BV15c – British Sugar, Hollow Road
 - BV15d – Eastern Way
 - BV15e – Mildenhall Road
 - BV15f – Northern Way
 - BV15g – Western Way
- 6.135 The sites have been subject to a detailed appraisal, the results of which are shown in Appendix F (Tables F21, F22, F25 - F29). The overall potential effects of the Policy BV15 are summarised below.

General Assessment of Policy BV15 and proposed employment redevelopment/re-use sites against the Sustainability Objectives

Positive effects

- Positive effects have been predicted for economic objectives 19 - 22 (sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment). As Policy BV15 safeguards employment areas designations it delivers beneficial effects across all SA economic objectives.
- Objective 16: To conserve and enhance biodiversity and geodiversity- Allocation BV15a and BV15c site are within 2km of a SSSI (The Glen Chalk Caves) and the nearest Local Nature Reserve, Moreton Hall Community Woods, which is located approximately 500m from the site.

Negative effects

- Objective 9: To improve water and air quality – Allocations BV15a and BV15c are located within a groundwater source protection zone 1 and within a major aquifer area (i.e. providing a high level of water storage). In addition, allocation BV15d, BV15e is located within a groundwater source protection zone 2 and within a major aquifer area (i.e. providing a high level of water storage). Therefore for allocations BV15b, BV15c, BV15g, BV15f and BV15g supporting text should specify which environmental considerations should be met – this should include water quality and mitigating potential negative effects on water availability.

- Objective 10: To conserve soil resources and quality – The majority of the allocation BV12f is proposed on brownfield land. There are some grounds within the site that are greenfield and the land is designated as grade 2 agricultural land.
- Objective 16: To conserve and enhance biodiversity and geodiversity – BV15g is within 2km of Glen Chalk Caves SSSI and is within approximately 500m of the Local Nature Reserve, Moreton Hall Community Woods.

Mixed Use effects

- Objective 15: To reduce vulnerability to climatic events: The eastern boundary of allocation BV15c and BV15g are within Flood Zone 2 and Part of allocation BV15e is located within flood zone 3. However, the employment use represents a 'less vulnerable' use in terms of flood risk.

Policy Assessment Summary

- 6.136 Policy BV15 performed relatively well in the assessment 7 sites for employment for redevelopment or re-use of sites and buildings for alternative commercial business/mixed activities. The allocations support sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment.
- 6.137 The key constraints on the site relate to environmental constraints. Allocation BV15g is within 2km of Glen Chalk Caves SSSI.
- 6.138 In addition, Allocations BV15f and BV15g are not located within 5 minutes of a bus stop, which may increase reliance on cars to access this site.

Recommendations

- 6.139 The 2012 SA recommended that the policy supporting text should consider that the design and development of new sites so that they are sympathetic to the sensitive environmental features, including the SSSI and any potential adverse effects should be mitigated.
- 6.140 It was also recommended that the supporting policy text should consider the water quality and mitigating potential negative effects on water availability in advance of the development of the site where necessary.
- 6.141 The updated policy supporting text incorporates these recommendations.
- 6.142 It is further proposed that the supporting policy text could refer to the need to mitigate the loss of soil resources by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an afteruse appropriate to the soil's quality).

Policy BV16 British Sugar Lagoons

- 6.143 Policy BV16 encourage the long-term improvement of the lagoons, residue beds, spoil and landscaped areas of the British Sugar site once they are no longer required for the operational requirements of the factory. Policy BV16 proposes recreation and nature conservation uses and also employment uses on the land south of Compeigne Way (Use Class B2). The site has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F29). The overall potential effects of the Policy BV16 are summarised below.

General Assessment of Policy BV16 and proposed employment site against the Sustainability Objectives

Positive effects

- Objective 10: To conserve soil resources and quality- The site is brownfield land and previously developed land which no longer be necessary for the operational requirements of the factory. Appropriate forms of alternative use such as recreation and nature conservation uses will be considered across the site.
- Positive effects have been predicted for economic objectives 19 - 22 (sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment), as Policy BV16 also propose employment uses as part of the site redevelopment. This delivers beneficial effects across all SA economic objectives.
- Objective 15: To reduce vulnerability to climatic events: The site is not located within a flood zone and is not within 9m of a river corridor.
- Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance – There are no listed buildings located close to BV16.

Negative effects

- Objective 13: To reduce the effects of traffic on the environment - The commercial units are provisionally indicated for class B1 and B8 business uses. This is likely to involve deliveries by Heavy Goods Vehicles (HGVs), which could contribute to level of traffic and impact on the environment.

Mixed effects

- Objective 9: To improve water and air quality – BV16 is located within a groundwater source protection zone 1 and within a major aquifer area (i.e. providing a high level of water storage). Recreation and nature conservation uses are considered compatible with these environmental constraints. Development for employment uses may need to ensure that water quality is protected.
- Objective 12: To reduce waste - Trends for commercial and industrial (C&I) waste show an overall increase of waste arisings in Suffolk; and although a proportion of C&I waste landfilled has decreased and a proportion of recycling/composting increased, absolute volumes have grown for both categories. Whilst new and existing employment development will generate additional waste, proposals will be expected to meet requirements of Core Strategy Policy CS2 and will also be subject to corporate policies' requirements and financial incentives.
- Objective 15: To reduce vulnerability to climatic events: The site is located within Flood Zones 2 and 3 and may be susceptible to flooding.). Recreation and nature conservation uses are considered compatible with this constraint. Employment uses will need to be sites away from flood zone 3.
- Objective 16: To conserve and enhance biodiversity and geodiversity- Allocation BV16 is within 2km of Glen Chalk Caves SSSI and it is located in close proximity to Local Nature Reserve (Moreton Hall Community Woods). Recreation and nature conservation uses are considered compatible with these environmental constraints. Development for employment uses may need to ensure that its future design is sympathetic to these environmental features.

Policy Assessment Summary

- 6.144 Policy BV16 performed relatively well against the SA framework, although some of the sustainability objectives were not applicable to the sites considered within this policy due to their specific nature.

- 6.145 The key constraints on the site relate to environmental and flooding issues. Allocation BV16 is within Flood Zones 2 and may be susceptible to flooding. Although the employment use represents a 'less vulnerable' use in terms of flood risk, mitigation measures should be considered and implemented for new development within the site where necessary.
- 6.146 In addition, BV16 is within 2km of Glen Chalk Caves SSSI and it is located in close proximity to Local Nature Reserve (Moreton Hall Community Woods). Therefore the future design and development of the employment site will need to be sympathetic to these environmental and historic features.
- 6.147 Recreation and nature conservation uses also proposed on site are considered compatible with the environmental constraints listed above.

Recommendations

- 6.148 The 2012 SA recommended that the policy supporting text should consider that flood mitigation measures in advance of development of the site where necessary.
- 6.149 It was also recommended that the supporting text should consider that the design and development of new sites so that they are sympathetic to the sensitive environmental and heritage features, including the SSSI and LNR and any potential adverse effects should be mitigated.
- 6.150 The updated policy supporting text incorporates these recommendations.

Policy BV17 Bury St Edmunds Retail Park

- 6.151 Policy BV17 safeguards one development site for employment uses (retail). The site has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F30). The overall potential effects of the Policy BV17 are summarised below.

General Assessment of Policy BV17 and proposed employment site against the Sustainability Objectives

Positive effects

- Positive effects have been predicted for economic objectives 19 - 22 (sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment). As Policy BV17 safeguards employment areas designations it delivers beneficial effects across all SA economic objectives.
- Objective 15: To reduce vulnerability to climatic events: The site is not located within a flood zone and is not within 9m of a river corridor

Negative effects

- Objective 9: To improve water and air quality – BV17 is located within a groundwater source protection zone 2 and within a major aquifer area (i.e. providing a high level of water storage). Therefore, Policy BV17 supporting text should specify which environmental considerations should be met – this should include water quality and mitigating potential negative effects on water availability.
- Objective 16: To conserve and enhance biodiversity and geodiversity- Allocation BV16 is within 2km of Glen Chalk Caves SSSI and it is located in close proximity to Local Nature Reserve (Moreton Hall Community Woods). Therefore the future design and development of the site will need to be sympathetic to these environmental and historic features.
- Objective 13: To reduce the effects of traffic on the environment - The commercial units are provisionally indicated for retail uses. This is likely to involve deliveries by

Heavy Goods Vehicles (HGVs), which could contribute to level of traffic and impact on the environment.

Mixed effects

- Objective 12: To reduce waste - Trends for commercial and industrial (C&I) waste show an overall increase of waste arisings in Suffolk; and although a proportion of C&I waste landfilled has decreased and a proportion of recycling/composting increased, absolute volumes have grown for both categories. Whilst new and existing employment development will generate additional waste, proposals will be expected to meet requirements of Core Strategy Policy CS2 and will also be subject to corporate policies' requirements and financial incentives.

Policy Assessment Summary

- 6.152 Policy BV17 performed relatively well against the SA framework, although some of the sustainability objectives were not applicable to the sites considered within this policy due to their specific nature.
- 6.153 The key constraints on the site relate to environmental constraints. Site BV17 is within 2km of Glen Chalk Caves SSSI and it is located in close proximity to Local Nature Reserve (Moreton Hall Community Woods). Therefore the future design and development of the site will need to be sympathetic to these environmental and historic features.

Recommendations

- 6.154 The 2012 SA recommended that the policy supporting text should consider the design and development of new sites so that they are sympathetic to the sensitive heritage features and any potential adverse effects should be mitigated.
- 6.155 It was also recommended that the policy supporting text should refer to the need for water quality and water availability mitigation measures.
- 6.156 The updated policy supporting text incorporates these recommendations.

Policy BV20 Land West of Rougham Road

- 6.157 Policy BV20 identifies one site for outdoor recreational use and associated facilities. The site has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F40). The overall potential effects of the Policy BV20 are summarised below.

General Assessment of Policy BV20 and proposed outdoor recreational use site against the Sustainability Objectives

Positive effects

- Objective 1: To improve health of the population overall and reduce health inequalities - The site is within a reasonable walking/cycling distance of a GP's surgery and dental facilities and has access to hospital facilities within 30 minutes by public transport.
- Objective 2: To maintain and improve levels of education and skills in the population overall - The town has primary schools and secondary with spare capacity and is within a 30 minute bus journey to secondary schools. The site is within a 10 minute walk of primary and upper schools and is easily cyclable.
- Objective 5: To improve access to key services for all sectors of the population - Bury St Edmunds benefits from an excellent range of key services, shops and supermarkets. The site provides a mixed-use development.
- Objective 8: To improve the quality of where people live and encourage community participation - The site provides outdoor recreational uses within a green space.

- Objective 13: To reduce the effects of traffic on the environment: The site has good access to the local facilities in the town, which reduces the need for unnecessary trips by private vehicle.
- Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance- There are no listed buildings on or adjacent to the site and the site is not within or adjacent to a conservation area or a Historic Park and Garden. The site is not located in proximity to an SM or near an Area identified as Archaeological Importance.
- Objective 18: To conserve and enhance the quality and local distinctiveness of landscapes and townscapes - The site is not within a Green Corridor and will not lead to coalescence of the urban extension with nearby villages. In addition, the policy requires strategic landscaping and open space be provided to address the individual site requirements and location.
- Objective 21: To encourage efficient patterns of movement in support of economic growth: The site is located within five minutes of a bus stop. The site is well located to access services and facilities within the town.

Mixed effects

- Objective 10: To conserve soil resources and quality- The greenfield land will be protected as recreational open space for community participation, although there will be some loss with the development of the associated facilities. There will be a loss of grade 3 agricultural land.

Negative effects

- Objective 9: To improve water and air quality – BV20 is located within a groundwater source protection zone 2 and within a major aquifer area (i.e. providing a high level of water storage). Therefore, Policy BV20 supporting text should specify which environmental considerations should be met – this should include water quality and mitigating potential negative effects on water availability.
- Objective 16: To conserve and enhance biodiversity and geodiversity- Allocation BV16 is within 2km of Glen Chalk Caves SSSI and it is located in close proximity to Local Nature Reserve (Moreton Hall Community Woods). Therefore the future design and development of the site will need to be sympathetic to these environmental and historic features.

Policy Assessment Summary

6.158 Policy BV20 performed relatively well in the assessment providing a site for outdoor recreational use. The site provides a good level of access to key local services and areas of green space that promote recreational opportunities.

6.159 In addition, BV20 is within 2km of Glen Chalk Caves SSSI and it is located in close proximity to Local Nature Reserve (Moreton Hall Community Woods). Therefore the future design and development of the site will need to be sympathetic to these environmental and historic features.

Recommendations

6.160 The 2012 SA recommended that the policy supporting text should consider that the design and development of new sites so that they are sympathetic to the sensitive environmental, including the SSSI and LNR and any potential adverse effects should be mitigated.

6.161 It was also recommended that the policy supporting text should refer to the need for water quality and water availability mitigation measures.

6.162 The updated policy supporting text incorporates these recommendations.

- 6.163 It is proposed that the supporting policy text could refer to the need to mitigate the loss of soil resources by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an afteruse appropriate to the soil's quality).

Policy BV21 Rougham Airfield

- 6.164 Policy BV21 identifies one site for airfield, sporting an recreational uses and showground and outdoor events uses. The site has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F41). The overall potential effects of the Policy BV21 are summarised below.

General Assessment of Policy BV21 and proposed outdoor recreational use site against the Sustainability Objectives

Positive effects

- Objective 8: To improve the quality of where people live and encourage community participation - The airfield provides opportunity for recreational and leisure events.
- Objective 10: To conserve soil resources and quality- The sites is a developed sites and further development will not lead to the loss of agricultural land. The greenfield land will be protected as the airfield.
- Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance - There are no listed buildings on or adjacent to the site and the site is not within or adjacent to a conservation area or a Historic Park and Garden. The site is not located in proximity to an SM or an Area of Archaeological Importance.
- Objective 18: To conserve and enhance the quality and local distinctiveness of landscapes and townscapes - The site is not within a Green Corridor and will not lead to coalescence of the urban extension with nearby villages. In addition, the policy requires strategic landscaping and open space be provided to address the individual site requirements and location.
- Objective 21: To encourage efficient patterns of movement in support of economic growth: The site is located within five minutes of a bus stop. The site is well located to access services and facilities within the town.

Negative effects

- Objective 9: To improve water and air quality – BV21 is located within a groundwater source protection zone 2 and within a major aquifer area (i.e. providing a high level of water storage). Therefore, Policy BV21 supporting text should specify which environmental considerations should be met – this should include water quality and mitigating potential negative effects on water availability.
- Objective 16: To conserve and enhance biodiversity and geodiversity- Allocation BV16 is within 2km of Glen Chalk Caves SSSI. Therefore the future design and development of the site will need to be sympathetic to these environmental and historic features.

Mixed effects

- Objective 12: To reduce waste - Trends for commercial and industrial (C&I) waste show an overall increase of waste arisings in Suffolk; and although a proportion of C&I waste landfilled has decreased and a proportion of recycling/composting increased, absolute volumes have grown for both categories. Whilst new and existing employment development will generate additional waste, proposals will be expected to meet requirements of Core Strategy Policy CS2 and will also be subject to corporate policies' requirements and financial incentives.

Policy Assessment Summary

- 6.165 Policy BV22 performed relatively well against the SA framework, although some of the sustainability objectives were not applicable to the sites considered within this policy due to their specific nature. The site provides a good level of access to key local services and the airfield provides recreational and leisure event opportunities.
- 6.166 The key constraints on the site relate to environmental issues. BV21 is within 2km of Glen Chalk Caves SSSI. Therefore the future design and development of the site will need to be sympathetic to these environmental and historic features.

Recommendations

- 6.167 The 2012 SA recommended that the policy supporting text should consider that the design and development of new sites so that they are sympathetic to the sensitive environmental features, including the SSSI and any potential adverse effects should be mitigated.
- 6.168 It was also recommended that the policy supporting text should refer to the need for water quality and water availability mitigation measures.
- 6.169 The updated policy supporting text incorporates these recommendations.

Policy BV23 West Suffolk Hospital and St. Nicholas Hospice

- 6.170 Policy BV23 identifies one site for healthcare and associated uses. The site has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F42). The overall potential effects of the Policy BV23 are summarised below.

General Assessment of Policy BV23 and proposed healthcare and associated uses against the Sustainability Objectives

Positive effects

- Objective 1: To improve health of the population overall and reduce health inequalities - The site provides a hospital, and a bus stop is located within five minutes walk to gain access to dentist and GP surgeries within Bury St Edmunds.
- Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance- There are no listed buildings on or adjacent to the site and the site is not within or adjacent to a conservation area or a Historic Park and Garden. The site is not located in proximity to an SM or near an Area of Archaeological Importance.
- Positive effects have been predicted for economic objectives 19 - 22 (sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment). Policy BV23 safeguards healthcare related employment, which delivers beneficial effects across all SA economic objectives.
- Objective 21: To encourage efficient patterns of movement in support of economic growth: The site is located within five minutes of a bus stop. The site is well located to access services and facilities within the town.

Negative effects

- Objective 9: To improve water and air quality – BV23 is located within a groundwater source protection zone 2 and within a major aquifer area (i.e. providing a high level of water storage). Therefore, Policy BV23 supporting text should specify which environmental considerations should be met – this should include water quality and mitigating potential negative effects on water availability.

- Objective 16: To conserve and enhance biodiversity and geodiversity- Allocation BV23 is within 2km of Glen Chalk Caves SSSI. Therefore the future design and development of the site will need to be sympathetic to these environmental and historic features.

Mixed effects

- Objective 12: To reduce waste - Trends for commercial and industrial (C&I) waste show an overall increase of waste arisings in Suffolk; and although a proportion of C&I waste landfilled has decreased and a proportion of recycling/composting increased, absolute volumes have grown for both categories. Whilst new and existing employment development will generate additional waste, proposals will be expected to meet requirements of Core Strategy Policy CS2 and will also be subject to corporate policies' requirements and financial incentives.

Policy Assessment Summary

- 6.171 Policy BV23 performed relatively well against the SA framework, although some of the sustainability objectives were not applicable to the sites considered within this policy due to their specific nature. The site provides health care facilities and related employment opportunities with good public transport links.
- 6.172 The key constraints on the site relate to environmental issues. BV24 is within 2km of Glen Chalk Caves SSSI. Therefore, the future design and development of the site will need to be sympathetic to these environmental and historic features.

Recommendations

- 6.173 The 2012 SA recommended that the policy supporting text should consider that the design and development of new sites so that they are sympathetic to the sensitive environmental and heritage features, including the SSSI and any potential adverse effects should be mitigated.
- 6.174 It was also recommended that the policy supporting text should refer to the need for water quality and water availability mitigation measures.
- 6.175 The updated policy supporting text incorporates these recommendations.

Policy BV24 West Suffolk College

- 6.176 Policy BV24 relates to a further education site at West Suffolk College. The site has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F43). The overall potential effects of the Policy BV24 are summarised below.

General Assessment of Policy BV24 and proposed education and related uses against the Sustainability Objectives

Positive effects

- Objective 1: To improve health of the population overall and reduce health inequalities - The site is within reasonable walking/cycling distance of a GP's surgery and dental facilities and has access to hospital facilities within 30 minutes by public transport.
- Objective 2: To maintain and improve levels of education and skills in the population overall - The town has primary schools and secondary with spare capacity and is within a 30 minute bus journey to secondary schools. The site provides an educational college facility and is within a 10 minute walk of primary and upper schools and is easily cyclable.
- Objective 5: To improve access to key services for all sectors of the population - Bury St Edmunds benefits from an excellent range of key services, shops and supermarkets. The site provides a mixed-use development.

- Objective 8: To improve the quality of where people live and encourage community participation - The site is close to an area of accessible green space.
- Objective 13: To reduce the effects of traffic on the environment: The site has good access to the local facilities in the town, which reduces the need for unnecessary trips by private vehicle.
- Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance - There are no listed buildings on or adjacent to the site and the site is not within or adjacent to a conservation area or a Historic Park and Garden. The site is not located in proximity to a SM or near an Area of Archaeological Importance.
- Objective 18: To conserve and enhance the quality and local distinctiveness of landscapes and townscapes - The site is not within a Green Corridor and will not lead to coalescence of the urban extension with nearby villages. In addition, the policy requires strategic landscaping and open space be provided to address the individual site requirements and location.
- Objective 21: To encourage efficient patterns of movement in support of economic growth: The site is located within five minutes of a bus stop. The site is well located to access services and facilities within the town.
- Positive effects have been predicted for economic objectives 19 - 22 (sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment). As Policy BV25 safeguards a college site that provides educational related employment uses, it delivers beneficial effects across all SA economic objectives.

Negative effects

- Objective 9: To improve water and air quality – BV24 is located within a groundwater source protection zone 2 and within a major aquifer area (i.e. providing a high level of water storage). The site is also in close proximity to Horringer Court Caves SSSI. Therefore, Policy BV24 supporting text should specify which environmental considerations should be met – this should include water quality and mitigating potential negative effects on water availability.
- Objective 16: To conserve and enhance biodiversity and geodiversity- Allocation BV16 is within 2km of a SSSI (The Glen Chalk Caves). Therefore the future design and development of the site will need to be sympathetic to these environmental and historic features.
- Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance – Allocation BV24 is located within the historic Gibraltar Barracks site Grade II Listed.

Mixed effects

- Objective 12: To reduce waste - Trends for commercial and industrial (C&I) waste show an overall increase of waste arisings in Suffolk; and although a proportion of C&I waste landfilled has decreased and a proportion of recycling/composting increased, absolute volumes have grown for both categories. Whilst new and existing employment development will generate additional waste, proposals will be expected to meet requirements of Core Strategy Policy CS2 and will also be subject to corporate policies' requirements and financial incentives.

Policy Assessment Summary

- 6.177 Policy BV24 performed relatively well against the SA framework, although some of the sustainability objectives were not applicable to the sites considered within this policy due

to their specific nature. The site provides educational and employment value as a college site, a good level of access to key local services and open space.

6.178 The key constraints on the site relate to environmental and heritage issues. BV24 is within 2km of a SSSI (The Glen Chalk Caves) and the site is located within the historic Gibraltar Barracks site Grade II Listed. Therefore, the future design and development of the site will need to be sympathetic to these environmental and historic features.

6.179 The supporting policy text should consider the water quality and mitigating potential negative effects on water availability in advance of the development of the site where necessary.

Recommendations

6.180 The 2012 SA recommended that the policy supporting text should consider that the design and development of new sites so that they are sympathetic to the sensitive environmental and heritage features, including the SSSI, and any potential adverse effects should be mitigated.

6.181 The updated policy supporting text incorporates these recommendations.

Table 6.10 – Other residential/ Mixed Use: Summary of Sites Assessments

| SA Objective | | Indicator | Policy BV8 | Policy BV9 | Policy BV10 | | | | | | | Policy BV11 | | |
|--------------|--|---|------------------|-----------------|-------------------------------------|--------------------------------|---------------------|------------------|-------------------|---------------------------|---------------------|-------------------|------|--|
| | | | BV8 Station Hill | BV9 Tayfen Road | BV10a Bury St Edmunds Garden Centre | BV10b Land at Jacqueline Close | BV10c Hospital Site | BV10d Shire Hall | BV10e Weymed Site | BV10f Land at School Yard | BV10g Almoners Road | BV10h Cotton Lane | BV11 | |
| 1 | To improve health of the population overall and reduce health inequalities | Is it within 30 mins of a GP, dentist and hospital by public transport? | | | | | | | | | | | | |
| | | Will it lead to a direct loss of public open space or open access land? | | | | | | | | | | | | |
| | | Will it improve accessibility by Public Rights of Way? | | | | | | | | | | | | |
| 2 | To maintain and improve levels of education and skills in the population overall | Is it within 30 mins of a school by public transport? | | | | | | | | | | | | |
| | | Is it within walkable/cyclable distances (800m and 2-5km)? | | | | | | | | | | | | |
| 3 | To reduce crime and anti-social activity | Will it reduce actual levels of crime? | | | | | | | | | | | | |
| | | Will it reduce fear of crime? | | | | | | | | | | | | |
| | | Will it reduce noise and odour concerns? | | | | | | | | | | | | |
| 4 | To reduce poverty and social exclusion | Will the site be located near or within LSOAs in the most deprived 20% to 40% in the country? | | | | | | | | | | | | |
| 5 | To improve access to | Is it within 30 minutes of the town centre by public transport? | | | | | | | | | | | | |

| SA Objective | Indicator | Policy BV8 | Policy BV9 | Policy BV10 | | | | | | | | Policy BV11 |
|--------------|--|---|-----------------|-------------------------------------|--------------------------------|---------------------|------------------|-------------------|---------------------------|---------------------|-------------------|-------------|
| | | BV8 Station Hill | BV9 Tayfen Road | BV10a Bury St Edmunds Garden Centre | BV10b Land at Jacqueline Close | BV10c Hospital Site | BV10d Shire Hall | BV10e Weymed Site | BV10f Land at School Yard | BV10g Almoners Road | BV10h Cotton Lane | BV11 |
| | key services for all sectors of the population | Is it within walkable/cyclable distances (800m and 2-5km) to key services? | | | | | | | | | | |
| | | Is it within 30 minutes of a supermarket/shopping centre by public transport? | | | | | | | | | | |
| | | Is it within walkable/cyclable distances (800m and 2-5km) to supermarkets/shopping centre? | | | | | | | | | | |
| | | Is the site proposed for mixed-use development with good accessibility to local facilities? | | | | | | | | | | |
| 6 | To offer everybody the opportunity for rewarding and satisfying employment | Is the site proposed for employment or mixed use with employment included? | | | | | | | | | | |
| 7 | To meet the housing requirements of the whole community | Is the site proposal over the relevant thresholds for the application of affordable housing policy? | | | | | | | | | | |

| SA Objective | Indicator | Policy BV8 | Policy BV9 | Policy BV10 | | | | | | | | Policy BV11 |
|--------------|---|------------------|-----------------|-------------------------------------|--------------------------------|---------------------|------------------|-------------------|---------------------------|---------------------|-------------------|-------------|
| | | BV8 Station Hill | BV9 Tayfen Road | BV10a Bury St Edmunds Garden Centre | BV10b Land at Jacqueline Close | BV10c Hospital Site | BV10d Shire Hall | BV10e Weymed Site | BV10f Land at School Yard | BV10g Almoners Road | BV10h Cotton Lane | BV11 |
| 8 | To improve the quality of where people live and encourage community participation | | | | | | | | | | | |
| 9 | To improve water and air quality | | | | | | | | | | | |
| | Is the site proposed within a groundwater source protection zone and/or within an area designated as major aquifer? | | | | | | | | | | | |
| | Is the site proposed within an area with good access to mains water and wastewater networks and with existing capacity? | | | | | | | | | | | |
| | Is the site proposed within an Air Quality Management Area (AQMA)? | | | | | | | | | | | |
| 10 | To conserve soil resources and quality | | | | | | | | | | | |
| | Is the site proposed on Greenfield land? | | | | | | | | | | | |
| | Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3)? | | | | | | | | | | | |
| | Will it lead to remediation of contaminated land? | | | | | | | | | | | |

| SA Objective | | Indicator | Policy BV8 | Policy BV9 | Policy BV10 | | | | | | | Policy BV11 | |
|--------------|---|---|------------------|-----------------|-------------------------------------|--------------------------------|---------------------|------------------|-------------------|---------------------------|---------------------|-------------------|------|
| | | | BV8 Station Hill | BV9 Tayfen Road | BV10a Bury St Edmunds Garden Centre | BV10b Land at Jacqueline Close | BV10c Hospital Site | BV10d Shire Hall | BV10e Weymed Site | BV10f Land at School Yard | BV10g Almoners Road | BV10h Cotton Lane | BV11 |
| 11 | To use water and mineral resources efficiently, and re-use and recycle where possible | Will it promote sustainable use of minerals? | | | | | | | | | | | |
| | | Will it promote sustainable use of water? | | | | | | | | | | | |
| | | Will it maintain water availability for water dependant habitats? | | | | | | | | | | | |
| 12 | To reduce waste | Will it reduce waste arisings? | | | | | | | | | | | |
| | | Will it increase waste recovery and recycling? | | | | | | | | | | | |
| 13 | To reduce the effects of traffic on the environment | Does the site have good accessibility to local facilities (as assessed above)? | | | | | | | | | | | |
| 14 | To reduce contributions to climate change | Will the site proposal promote the incorporation of small-scale renewable in developments? | | | | | | | | | | | |
| | | Is there a clear commitment to meet Code Level 3 or above of the Government's Code for Sustainable Homes? | | | | | | | | | | | |
| 15 | To reduce vulnerability to climatic | Does the site lie within the flood risk zones (2, 3a, 3b) identified in the SFRA and have a | | | | | | | | | | | |

| SA Objective | Indicator | Policy BV8 | Policy BV9 | Policy BV10 | | | | | | | | Policy BV11 |
|--------------|--|--|-----------------|-------------------------------------|--------------------------------|---------------------|------------------|-------------------|---------------------------|---------------------|-------------------|-------------|
| | | BV8 Station Hill | BV9 Tayfen Road | BV10a Bury St Edmunds Garden Centre | BV10b Land at Jacqueline Close | BV10c Hospital Site | BV10d Shire Hall | BV10e Weymed Site | BV10f Land at School Yard | BV10g Almoners Road | BV10h Cotton Lane | BV11 |
| | events | | | | | | | | | | | |
| 16 | To conserve and enhance biodiversity and geodiversity | Is the site in proximity to a Special Protection Area (SPA), Special Area of Conservation (SAC) or Site of Special Scientific Interest (SSSI)? | | | | | | | | | | |
| | | Is the site in proximity to a County Wildlife Site, Local Nature Reserve or Ancient Woodland? | | | | | | | | | | |
| | | Are BAP habitats and species known to be on the site? | | | | | | | | | | |
| | | Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS (Regionally Important Geological/Geomorphological Sites)? | | | | | | | | | | |
| 17 | To conserve and where appropriate enhance areas of historical and archaeological | Are there any listed buildings on or adjacent to the site? | | | | | | | | | | |
| | | Is the site in or adjacent to a Conservation Area? | | | | | | | | | | |
| | | Is the site in or adjacent to a Historic Park and Garden? | | | | | | | | | | |
| | | Is the site in or adjacent to a Scheduled | | | | | | | | | | |

| SA Objective | Indicator | Policy BV8 | Policy BV9 | Policy BV10 | | | | | | | | Policy BV11 |
|--------------|--|--|-----------------|-------------------------------------|--------------------------------|---------------------|------------------|-------------------|---------------------------|---------------------|-------------------|-------------|
| | | BV8 Station Hill | BV9 Tayfen Road | BV10a Bury St Edmunds Garden Centre | BV10b Land at Jacqueline Close | BV10c Hospital Site | BV10d Shire Hall | BV10e Weymed Site | BV10f Land at School Yard | BV10g Almoners Road | BV10h Cotton Lane | BV11 |
| | importance | Monument (SM)? | | | | | | | | | | |
| | | Is the site in or adjacent to an Area of Archaeological Importance or a potential archaeological site? | | | | | | | | | | |
| 18 | To conserve and enhance the quality and local distinctiveness of landscapes and townscapes | Is the site in or adjacent to a Green Corridor? | | | | | | | | | | |
| | | Will the site development lead to coalescence of urban extensions with nearby towns? | | | | | | | | | | |
| 19 | To achieve sustainable levels of prosperity and economic growth throughout the plan area | Is the site proposed for mixed-use development or employment? | | | | | | | | | | |
| 20 | To revitalise town centres | Is the site proposed for mixed-use development or employment in town centres? | | | | | | | | | | |

| SA Objective | | Indicator | Policy BV8 | Policy BV9 | Policy BV10 | | | | | | | Policy BV11 |
|--------------|---|---|------------------|-----------------|-------------------------------------|--------------------------------|---------------------|------------------|-------------------|---------------------------|---------------------|-------------------|
| | | | BV8 Station Hill | BV9 Tayfen Road | BV10a Bury St Edmunds Garden Centre | BV10b Land at Jacqueline Close | BV10c Hospital Site | BV10d Shire Hall | BV10e Weymed Site | BV10f Land at School Yard | BV10g Almoners Road | BV10h Cotton Lane |
| 21 | To encourage efficient patterns of movement in support of economic growth | Is the site proposed in a proximity to a public transport route or in a walkable/cyclable distance? | | | | | | | | | | |
| 22 | To encourage and accommodate both indigenous and inward investment | Will it increase employment land availability? | | | | | | | | | | |

Key:






| | | | |
|---|--|--|---|
|  | In conformity with the criterion |  | Not relevant to criterion / Neutral effects |
|  | Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified |  | Insufficient information is available |
|  | In conflict with the criterion | | |

Table 6.11 –Employment and Alternative Commercial Business/Mixed Uses: Summary of Sites Assessments

| SA Objective | | Indicator | Policy BV13 | Policies BV14, BV15 & BV16 | | | | | | | | | | Policy BV17 |
|--------------|--|---|--------------|----------------------------|-------------------|-----------------------------|-----------------------------|------------------------|---------------------------|-------------------------------|----------------------------|-------------------|------------------------------------|-----------------------------|
| | | | Moreton Hall | BV14a Anglian Lane | BV15a Barton Road | BV14c / BV15b Blenheim Park | BV14e Suffolk Business Park | BV14f Chapel Pond Hill | BV14g / BV15d Eastern Way | BV14i / BV15e Mildenhall Road | BV14k / BV15f Northern Way | BV15g Western Way | BV16 / BV15c British Sugar Lagoons | Bury St Edmunds Retail Park |
| 1 | To improve health of the population overall and reduce health inequalities | Is it within 30 mins of a GP, dentist and hospital by public transport? | | | | | | | | | | | | |
| | | Will it lead to a direct loss of public open space or open access land? | | | | | | | | | | | | |
| | | Will it improve accessibility by Public Rights of Way? | | | | | | | | | | | | |
| 2 | To maintain and improve levels of education and skills in the population overall | Is it within 30 mins of a school by public transport? | | | | | | | | | | | | |
| | | Is it within walkable/cyclable distances (800m and 2-5km)? | | | | | | | | | | | | |
| 3 | To reduce crime and anti-social activity | Will it reduce actual levels of crime? | | | | | | | | | | | | |
| | | Will it reduce fear of crime? | | | | | | | | | | | | |
| | | Will it reduce noise and odour concerns? | | | | | | | | | | | | |
| 4 | To reduce poverty and social exclusion | Will the site be located near or within LSOAs in the most deprived 20% to 40% in the country? | | | | | | | | | | | | |
| 5 | To improve access to key services for all sectors of the population | Is it within 30 minutes of the town centre by public transport? | | | | | | | | | | | | |
| | | Is it within walkable/cyclable distances (800m and 2-5km) to key services? | | | | | | | | | | | | |
| | | Is it within 30 minutes of a supermarket/ shopping | | | | | | | | | | | | |

| SA Objective | | Indicator | Policy BV13 | Policies BV14, BV15 & BV16 | | | | | | | | | | Policy BV17 |
|--------------|---|---|-------------------|----------------------------|-------------------|-----------------------------|-----------------------------|------------------------|---------------------------|-------------------------------|----------------------------|-------------------|------------------------------------|----------------------------------|
| | | | BV13 Moreton Hall | BV14a Anglian Lane | BV15a Barton Road | BV14c / BV15b Blenheim Park | BV14e Suffolk Business Park | BV14f Chapel Pond Hill | BV14g / BV15d Eastern Way | BV14i / BV15e Mildenhall Road | BV14k / BV15f Northern Way | BV15g Western Way | BV16 / BV15c British Sugar Lagoons | BV17 Bury St Edmunds Retail Park |
| | | centre by public transport? | | | | | | | | | | | | |
| | | Is it within walkable/cyclable distances (800m and 2-5km) to supermarkets/shopping centre? | | | | | | | | | | | | |
| | | Is the site proposed for mixed-use development with good accessibility to local facilities? | | | | | | | | | | | | |
| 6 | To offer everybody the opportunity for rewarding and satisfying employment | Is the site proposed for employment or mixed use with employment included? | | | | | | | | | | | | |
| 7 | To meet the housing requirements of the whole community | Is the site proposal over the relevant thresholds for the application of affordable housing policy? | | | | | | | | | | | | |
| 8 | To improve the quality of where people live and encourage community participation | Is the site proposed in a location with accessible natural green space? | | | | | | | | | | | | |
| 9 | To improve water and air quality | Is the site proposed within a groundwater source protection zone and/or within an area designated as major aquifer? | | | | | | | | | | | | |
| | | Is the site proposed within an area with good access to mains water and wastewater | | | | | | | | | | | | |

| SA Objective | | Indicator | Policy BV13 | Policies BV14, BV15 & BV16 | | | | | | | | | | Policy BV17 |
|--------------|---|--|-------------------|----------------------------|-------------------|-----------------------------|-----------------------------|------------------------|---------------------------|-------------------------------|----------------------------|-------------------|------------------------------------|----------------------------------|
| | | | BV13 Moreton Hall | BV14a Anglian Lane | BV15a Barton Road | BV14c / BV15b Blenheim Park | BV14e Suffolk Business Park | BV14f Chapel Pond Hill | BV14g / BV15d Eastern Way | BV14i / BV15e Mildenhall Road | BV14k / BV15f Northern Way | BV15g Western Way | BV16 / BV15c British Sugar Lagoons | BV17 Bury St Edmunds Retail Park |
| | | networks and with existing capacity? | | | | | | | | | | | | |
| | | Is the site proposed within an Air Quality Management Area (AQMA)? | | | | | | | | | | | | |
| 10 | To conserve soil resources and quality | Is the site proposed on Greenfield land? | | | | | | | | | | | | |
| | | Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3)? | | | | | | | | | | | | |
| | | Will it lead to remediation of contaminated land? | | | | | | | | | | | | |
| 11 | To use water and mineral resources efficiently, and re-use and recycle where possible | Will it promote sustainable use of minerals? | | | | | | | | | | | | |
| | | Will it promote sustainable use of water? | | | | | | | | | | | | |
| | | Will it maintain water availability for water dependant habitats? | | | | | | | | | | | | |
| 12 | To reduce waste | Will it reduce waste arisings? | | | | | | | | | | | | |
| | | Will it increase waste recovery and recycling? | | | | | | | | | | | | |
| 13 | To reduce the effects of traffic on the environment | Does the site have good accessibility to local facilities (as assessed above)? | | | | | | | | | | | | |
| 14 | To reduce contributions to climate change | Will the site proposal promote the incorporation of small-scale renewable in developments? | | | | | | | | | | | | |
| | | Is there a clear commitment to meet Code Level 3 or above of the Government's Code for Sustainable | | | | | | | | | | | | |

| SA Objective | | Indicator | Policy BV13 | Policies BV14, BV15 & BV16 | | | | | | | | | | Policy BV17 |
|--------------|---|---|-------------------|----------------------------|-------------------|-----------------------------|-----------------------------|------------------------|---------------------------|-------------------------------|----------------------------|-------------------|------------------------------------|----------------------------------|
| | | | BV13 Moreton Hall | BV14a Anglian Lane | BV15a Barton Road | BV14c / BV15b Blenheim Park | BV14e Suffolk Business Park | BV14f Chapel Pond Hill | BV14g / BV15d Eastern Way | BV14i / BV15e Mildenhall Road | BV14k / BV15f Northern Way | BV15g Western Way | BV16 / BV15c British Sugar Lagoons | BV17 Bury St Edmunds Retail Park |
| | | Homes? | | | | | | | | | | | | |
| 15 | To reduce vulnerability to climatic events | Does the site lie within the flood risk zones (2, 3a, 3b) identified in the SFRA and have a proposed 'non-compatible' use or is located within 9m of a river? | | | | | | | | | | | | |
| 16 | To conserve and enhance biodiversity and geodiversity | Is the site in proximity to a Special Protection Area (SPA), Special Area of Conservation (SAC) or Site of Special Scientific Interest (SSSI)? | | | | | | | | | | | | |
| | | Is the site in proximity to a County Wildlife Site, Local Nature Reserve or Ancient Woodland? | | | | | | | | | | | | |
| | | Are BAP habitats and species known to be on the site? | | | | | | | | | | | | |
| | | Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS (Regionally Important Geological/Geomorphological Sites)? | | | | | | | | | | | | |
| 17 | To conserve and where appropriate enhance areas of historical and archaeological importance | Are there any listed buildings on or adjacent to the site? | | | | | | | | | | | | |
| | | Is the site in or adjacent to a Conservation Area? | | | | | | | | | | | | |
| | | Is the site in or adjacent to a Historic Park and Garden? | | | | | | | | | | | | |
| | | Is the site in or adjacent to a Scheduled Monument (SM)? | | | | | | | | | | | | |
| | | Is the site in or adjacent to an | | | | | | | | | | | | |

| SA Objective | | Indicator | Policy BV13 | Policies BV14, BV15 & BV16 | | | | | | | | | | Policy BV17 |
|--------------|--|---|-------------------|----------------------------|-------------------|-----------------------------|-----------------------------|------------------------|---------------------------|-------------------------------|----------------------------|-------------------|------------------------------------|----------------------------------|
| | | | BV13 Moreton Hall | BV14a Anglian Lane | BV15a Barton Road | BV14c / BV15b Blenheim Park | BV14e Suffolk Business Park | BV14f Chapel Pond Hill | BV14g / BV15d Eastern Way | BV14i / BV15e Mildenhall Road | BV14k / BV15f Northern Way | BV15g Western Way | BV16 / BV15c British Sugar Lagoons | BV17 Bury St Edmunds Retail Park |
| | | Area of Archaeological Importance or a potential archaeological site? | | | | | | | | | | | | |
| 18 | To conserve and enhance the quality and local distinctiveness of landscapes and townscapes | Is the site in or adjacent to a Green Corridor? | | | | | | | | | | | | |
| | | Will the site development lead to coalescence of urban extensions with nearby towns? | | | | | | | | | | | | |
| 19 | To achieve sustainable levels of prosperity and economic growth throughout the plan area | Is the site proposed for mixed-use development or employment? | | | | | | | | | | | | |
| 20 | To revitalise town centres | Is the site proposed for mixed-use development or employment in town centres? | | | | | | | | | | | | |
| 21 | To encourage efficient patterns of movement in support of economic growth | Is the site proposed in a proximity to a public transport route or in a walkable/cyclable distance? | | | | | | | | | | | | |
| 22 | To encourage and accommodate both indigenous and inward | Will it increase employment land availability? | | | | | | | | | | | | |

| SA Objective | Indicator | Policy BV13 | Policies BV14, BV15 & BV16 | | | | | | | | | | Policy BV17 |
|--------------|-----------|-------------------|----------------------------|-------------------|-----------------------------|-----------------------------|------------------------|---------------------------|-------------------------------|----------------------------|-------------------|------------------------------------|----------------------------------|
| | | BV13 Moreton Hall | BV14a Anglian Lane | BV15a Barton Road | BV14c / BV15b Blenheim Park | BV14e Suffolk Business Park | BV14f Chapel Pond Hill | BV14g / BV15d Eastern Way | BV14i / BV15e Mildenhall Road | BV14k / BV15f Northern Way | BV15g Western Way | BV16 / BV15c British Sugar Lagoons | BV17 Bury St Edmunds Retail Park |
| investment | | | | | | | | | | | | | |

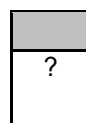
Key:



In conformity with the criterion

Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified

In conflict with the criterion



Not relevant to criterion / Neutral effects

? Insufficient information is available

Table 6.12 –Existing Local Centres and Community Facilities: Summary of Sites Assessments

| SA Objective | Indicator | Policy BV12 | | | | | | | | | |
|--------------|--|---|--------------------|-------------------------|-------------------------|--------------------------|--------------------|-------------------------------|--------------------------|----------------------|--|
| | | BV12a Barton Road | BV12b Cadogan Road | BV12c Glastonbury Court | BV12d Hardwick Precinct | BV12e Lake Avenue Parade | BV12f Moreton Hall | BV12g The Parade, Ridley Road | BV12h St Olaves Precinct | BV12i Stamford Court | |
| 1 | To improve health of the population overall and reduce health inequalities | Is it within 30 mins of a GP, dentist and hospital by public transport? | | | | | | | | | |
| | | Will it lead to a direct loss of public open space or open access land? | | | | | | | | | |
| | | Will it improve accessibility by Public Rights of Way? | | | | | | | | | |
| 2 | To maintain and improve levels of education and skills in the population overall | Is it within 30 mins of a school by public transport? | | | | | | | | | |
| | | Is it within walkable/cyclable distances (800m and 2-5km)? | | | | | | | | | |
| 3 | To reduce crime and anti-social | Will it reduce actual levels of crime? | | | | | | | | | |
| | | Will it reduce fear of | | | | | | | | | |

| SA Objective | | Indicator | Policy BV12 | | | | | | | | |
|--------------|--|---|----------------------|-----------------------|----------------------------|----------------------------|--------------------------|-----------------------|-------------------------------|--------------------------|----------------------|
| | | | BV12a Barton Road | BV12b Cadogan Road | BV12c Glastonbury Court | BV12d Hardwick Precinct | BV12e Lake Avenue Parade | BV12f Moreton Hall | BV12g The Parade, Ridley Road | BV12h St Olaves Precinct | BV12i Stamford Court |
| | activity | crime? | | | | | | | | | |
| | | Will it reduce noise and odour concerns? | | | | | | | | | |
| 4 | To reduce poverty and social exclusion | Will the site be located near or within LSOAs in the most deprived 20% to 40% in the country? | | | | | | | | | |
| 5 | To improve access to key services for all sects of the population | Is it within 30 mins of the town centre by public transport? | | | | | | | | | |
| | | Is it within walkable/cyclable distances (800m and 2-5km) to key services? | | | | | | | | | |
| | | Is it within 30 mins of a supermarket/ shopping centre by public transport? | | | | | | | | | |
| | | Is it within walkable/cyclable distances (800m and 2-5km) to supermarkets/shopping centre? | | | | | | | | | |
| | | Is the site proposed for mixed-use development with good accessibility to local facilities? | | | | | | | | | |
| 6 | To offer everybody the opportunity for rewarding and satisfying employment | Is the site proposed for employment or mixed use with employment included? | | | | | | | | | |

| SA Objective | Indicator | Policy BV12 | | | | | | | | |
|--------------|---|----------------------|-----------------------|----------------------------|----------------------------|--------------------------|-----------------------|-------------------------------|--------------------------|----------------------|
| | | BV12a Barton Road | BV12b Cadogan Road | BV12c Glastonbury Court | BV12d Hardwick Precinct | BV12e Lake Avenue Parade | BV12f Moreton Hall | BV12g The Parade, Ridley Road | BV12h St Olaves Precinct | BV12i Stamford Court |
| 7 | To meet the housing requirements of the whole community | | | | | | | | | |
| 8 | To improve the quality of where people live and encourage community participation | | | | | | | | | |
| 9 | To improve water and air quality | | | | | | | | | |
| | Is the site proposed within a groundwater source protection zone and/or within an area designated as major aquifer? | | | | | | | | | |
| | Is the site proposed within an area with good access to mains water and wastewater networks and with existing capacity? | | | | | | | | | |
| | Is the site proposed within an Air Quality Management Area (AQMA)? | | | | | | | | | |
| 10 | To conserve soil resources and quality | | | | | | | | | |
| | Is the site proposed on Greenfield land? | | | | | | | | | |
| | Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3a)? | | | | | | | | | |
| | Will it lead to remediation of contaminated land? | | | | | | | | | |

| SA Objective | | Indicator | Policy BV12 | | | | | | | | |
|--------------|---|---|----------------------|-----------------------|----------------------------|----------------------------|--------------------------|-----------------------|-------------------------------|--------------------------|----------------------|
| | | | BV12a Barton Road | BV12b Cadogan Road | BV12c Glastonbury Court | BV12d Hardwick Precinct | BV12e Lake Avenue Parade | BV12f Moreton Hall | BV12g The Parade, Ridley Road | BV12h St Olaves Precinct | BV12i Stamford Court |
| 11 | To use water and mineral resources efficiently, and re-use and recycle where possible | Will it promote sustainable use of minerals? | | | | | | | | | |
| | | Will it promote sustainable use of water? | | | | | | | | | |
| | | Will it maintain water availability for water dependant habitats? | | | | | | | | | |
| 12 | To reduce waste | Will it reduce waste arisings? | | | | | | | | | |
| | | Will it increase waste recovery and recycling? | | | | | | | | | |
| 13 | To reduce the effects of traffic on the environment | Does the site have good accessibility to local facilities (as assessed above)? | | | | | | | | | |
| 14 | To reduce contributions to climate change | Will the site proposal promote the incorporation of small-scale renewable in developments? | | | | | | | | | |
| | | Is there a clear commitment to meet Code Level 3 or above of the Government's Code for Sustainable Homes? | | | | | | | | | |
| 15 | To reduce vulnerability to climatic events | Does the site lie within the flood risk zones (2, 3a, 3b) identified in the SFRA and have a proposed 'non-compatible' use or is located within 9m of a river? | | | | | | | | | |
| 16 | To conserve | Is the site in proximity to | | | | | | | | | |

| SA Objective | | Indicator | Policy BV12 | | | | | | | | |
|--------------|---|---|----------------------|-----------------------|----------------------------|----------------------------|-----------------------------|-----------------------|----------------------------------|-----------------------------|-------------------------|
| | | | BV12a Barton Road | BV12b Cadogan Road | BV12c Glastonbury Court | BV12d Hardwick Precinct | BV12e Lake Avenue Parade | BV12f Moreton Hall | BV12g The Parade, Ridley Road | BV12h St Olaves Precinct | BV12i Stamford Court |
| | and enhance biodiversity and geodiversity | a Special Protection Area (SPA), Special Area of Conservation (SAC) or Site of Special Scientific Interest (SSSI)? | Red | Green | Green | Green | Green | Red | Green | Green | Red |
| | | Is the site in proximity to a County Wildlife Site, Local Nature Reserve or Ancient Woodland? | Red | Green | Green | Green | Green | Red | Green | Green | Green |
| | | Are BAP habitats and species known to be on the site? | Green | Green | Green | Green | Green | Green | Green | Green | Green |
| | | Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS (Regionally Important Geological/Geomorphological Sites)? | Green | Green | Green | Green | Green | Green | Green | Green | Green |
| 17 | To conserve and where appropriate enhance areas of historical and archaeological importance | Are there any listed buildings on or adjacent to the site? | Green | Green | Green | Green | Green | Orange | Green | Green | Green |
| | | Is the site in or adjacent to a Conservation Area? | Green | Green | Green | Green | Green | Green | Green | Green | Green |
| | | Is the site in or adjacent to a Historic Park and Garden? | Green | Green | Green | Green | Green | Green | Green | Green | Green |
| | | Is the site in or adjacent to a Scheduled Monument (SM)? | Green | Green | Green | Green | Green | Green | Green | Green | Green |
| | | Is the site in or adjacent to an Area of Archaeological Importance or a potential archaeological site? | Green | Green | Green | Green | Green | Green | Green | Green | Green |
| 18 | To conserve | Is the site in or adjacent | Grey | Grey | Grey | Grey | Grey | Grey | Grey | Grey | Grey |

| SA Objective | | Indicator | Policy BV12 | | | | | | | | |
|--------------|--|--|----------------------|-----------------------|----------------------------|----------------------------|--------------------------|-----------------------|-------------------------------|--------------------------|----------------------|
| | | | BV12a Barton Road | BV12b Cadogan Road | BV12c Glastonbury Court | BV12d Hardwick Precinct | BV12e Lake Avenue Parade | BV12f Moreton Hall | BV12g The Parade, Ridley Road | BV12h St Olaves Precinct | BV12i Stamford Court |
| | and enhance the quality and local distinctiveness of landscapes and townscapes | to a Green Corridor? Will the site development lead to coalescence of urban extensions with nearby towns? | | | | | | | | | |
| 19 | To achieve sustainable levels of prosperity and economic growth throughout the plan area | Is the site proposed for mixed-use development or employment? | | | | | | | | | |
| 20 | To revitalise town centres | Is the site proposed for mixed-use development or employment in town centres? | | | | | | | | | |
| 21 | To encourage efficient patterns of movement in support of economic growth | Is the site proposed in a proximity to a public transport route or in a walkable/cyclable distance? | | | | | | | | | |
| 22 | To encourage and accommodate both indigenous and inward investment | Will it increase employment land availability? | | | | | | | | | |

Key:

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

Table 6.13 –Other Uses: Summary of Sites Assessments

| SA Objective | | Indicator | Policy BV20 | Policy BV21 | Policy BV23 | Policy BV24 |
|--------------|--|---|--------------------------------|-----------------------|---|---------------------------|
| | | | BV20 Land West of Rougham Hill | BV21 Rougham Airfield | BV23 West Suffolk Hospital and St. Nicholas Hospice | BV24 West Suffolk College |
| 1 | To improve health of the population overall and reduce health inequalities | Is it within 30 mins of a GP, dentist and hospital by public transport? | | | | |
| | | Will it lead to a direct loss of public open space or open access land? | | | | |
| | | Will it improve accessibility by Public Rights of Way? | | | | |
| 2 | To maintain and improve levels of education and skills in the population overall | Is it within 30 mins of a school by public transport? | | | | |
| | | Is it within walkable/cyclable distances (800m and 2-5km)? | | | | |
| 3 | To reduce crime and anti-social activity | Will it reduce actual levels of crime? | | | | |
| | | Will it reduce fear of crime? | | | | |
| | | Will it reduce noise and odour concerns? | | | | |
| 4 | To reduce poverty and social exclusion | Will the site be located near or within LSOAs in the most deprived 20% to 40% in the country? | | | | |
| 5 | To improve access to key services for all sects of the population | Is it within 30 mins of the town centre by public transport? | | | | |
| | | Is it within walkable/cyclable distances (800m and 2-5km) to key services? | | | | |
| | | Is it within 30 mins of a | | | | |

| SA Objective | | Indicator | Policy BV20 | Policy BV21 | Policy BV23 | Policy BV24 |
|--------------|---|---|--------------------------------|-----------------------|---|---------------------------|
| | | | BV20 Land West of Rougham Hill | BV21 Rougham Airfield | BV23 West Suffolk Hospital and St. Nicholas Hospice | BV24 West Suffolk College |
| | | supermarket/ shopping centre by public transport? | | | | |
| | | Is it within walkable/cyclable distances (800m and 2-5km) to supermarkets/shopping centre? | | | | |
| | | Is the site proposed for mixed-use development with good accessibility to local facilities? | | | | |
| 6 | To offer everybody the opportunity for rewarding and satisfying employment | Is the site proposed for employment or mixed use with employment included? | | | | |
| 7 | To meet the housing requirements of the whole community | Is the site proposal over the relevant thresholds for the application of affordable housing policy? | | | | |
| 8 | To improve the quality of where people live and encourage community participation | Is the site proposed in a location with accessible natural green space? | | | | |
| 9 | To improve water and air quality | Is the site proposed within a groundwater source protection zone and/or within an area designated as major aquifer? | | | | |
| | | Is the site proposed within an area with good access to mains water and wastewater networks and with existing capacity? | | | | |
| | | Is the site proposed within an Air Quality Management Area (AQMA)? | | | | |
| 10 | To conserve soil | Is the site proposed on Greenfield | | | | |

| SA Objective | | Indicator | Policy BV20 | Policy BV21 | Policy BV23 | Policy BV24 |
|--------------|---|---|--------------------------------|-----------------------|---|---------------------------|
| | | | BV20 Land West of Rougham Hill | BV21 Rougham Airfield | BV23 West Suffolk Hospital and St. Nicholas Hospice | BV24 West Suffolk College |
| | resources and quality | land? | | | | |
| | | Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3a)? | | | | |
| | | Will it lead to remediation of contaminated land? | | | | |
| 11 | To use water and mineral resources efficiently, and re-use and recycle where possible | Will it promote sustainable use of minerals? | | | | |
| | | Will it promote sustainable use of water? | | | | |
| | | Will it maintain water availability for water dependant habitats? | | | | |
| 12 | To reduce waste | Will it reduce waste arisings? | | | | |
| | | Will it increase waste recovery and recycling? | | | | |
| 13 | To reduce the effects of traffic on the environment | Does the site have good accessibility to local facilities (as assessed above)? | | | | |
| 14 | To reduce contributions to climate change | Will the site proposal promote the incorporation of small-scale renewable in developments? | | | | |
| | | Is there a clear commitment to meet Code Level 3 or above of the Government's Code for Sustainable Homes? | | | | |
| 15 | To reduce vulnerability to climatic events | Does the site lie within the flood risk zones (2, 3a, 3b) identified in the SFRA and have a proposed 'non-compatible' use or is located within 9m of a river? | | | | |
| 16 | To conserve and enhance biodiversity and geodiversity | Is the site in proximity to a Special Protection Area (SPA), Special Area of Conservation (SAC) or Site of Special Scientific Interest (SSSI)? | | | | |

| SA Objective | | Indicator | Policy BV20 | Policy BV21 | Policy BV23 | Policy BV24 |
|--------------|---|---|--------------------------------|-----------------------|---|---------------------------|
| | | | BV20 Land West of Rougham Hill | BV21 Rougham Airfield | BV23 West Suffolk Hospital and St. Nicholas Hospice | BV24 West Suffolk College |
| | | Is the site in proximity to a County Wildlife Site, Local Nature Reserve or Ancient Woodland? | | | | |
| | | Are BAP habitats and species known to be on the site? | | | | |
| | | Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS (Regionally Important Geological/Geomorphological Sites)? | | | | |
| 17 | To conserve and where appropriate enhance areas of historical and archaeological importance | Are there any listed buildings on or adjacent to the site? | | | | |
| | | Is the site in or adjacent to a Conservation Area? | | | | |
| | | Is the site in or adjacent to a Historic Park and Garden? | | | | |
| | | Is the site in or adjacent to a Scheduled Monument (SM)? | | | | |
| | | Is the site in or adjacent to an Area of Archaeological Importance or a potential archaeological site? | | | | |
| 18 | To conserve and enhance the quality and local distinctiveness of landscapes and townscapes | Is the site in or adjacent to a Green Corridor? | | | | |
| | | Will the site development lead to coalescence of urban extensions with nearby villages? | | | | |
| 19 | To achieve sustainable levels of prosperity and economic growth throughout the plan area | Is the site proposed for mixed-use development or employment? | | | | |
| 20 | To revitalise town centres | Is the site proposed for mixed-use development or employment in | | | | |

| SA Objective | | Indicator | Policy BV20 | Policy BV21 | Policy BV23 | Policy BV24 |
|--------------|---|---|--------------------------------|-----------------------|---|---------------------------|
| | | | BV20 Land West of Rougham Hill | BV21 Rougham Airfield | BV23 West Suffolk Hospital and St. Nicholas Hospice | BV24 West Suffolk College |
| | | town centres? | | | | |
| 21 | To encourage efficient patterns of movement in support of economic growth | Is the site proposed in a proximity to a public transport route or in a walkable/cyclable distance? | | | | |
| 22 | To encourage and accommodate both indigenous and inward investment | Will it increase employment land availability? | | | | |

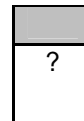
Key:



In conformity with the criterion

Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified

In conflict with the criterion



Not relevant to criterion / Neutral effects

Insufficient information is available

Cumulative Effects

- 6.182 Annex I of the SEA Directive requires that an assessment is made of the secondary, cumulative and synergistic effects of the Bury St Edmunds Vision 2031 Submission Draft document. The assessment should be considered in relation to the effects of the proposals within the SA document and those which may result from interaction with the effects of other plans and programmes. The effects identified may lead to significant positive or negative outcomes.
- 6.183 The table below outlines those receptors that could potentially experience significant cumulative effects based on current knowledge and methods of assessment.

Table 6.14 – Summary of Cumulative Effects

| Effects | Causes | Significance |
|---|--|---|
| Cumulative effect of improving the health of St Edmundsbury's resident population. | The proposals within the document taken together with the Core Strategy policies seek to address aspects that contribute to improving health; encompassing high quality housing delivered in sustainable locations. An improvement should be seen in walking and cycling provisions, as well as recreational facilities and access to them. Enhancement of the natural environment and transport may also improve air quality and a sense of wellbeing. | Significant positive effects increasingly apparent over the medium to longer term. |
| Cumulative effect of improving levels and skills of the population overall. | The increased population in Bury St Edmunds areas should help to maintain or enhance education provision in Bury St Edmunds for occupants of new development. | A cumulative positive effect likely over the longer term as development and infrastructure is provided. |
| Cumulative effect of the overall improvement in the access to key services for the Bury St Edmunds population. | The Core Strategy has directed the location of new development via the settlement hierarchy with Bury St Edmunds receiving more than half of new development. Policy CS11 has been translated into the Bury St Edmunds Vision 2031 Submission Draft document. With a number of development allocations within central and accessible locations this will result in a reduction in the need for residents and workers to travel to access key services. In addition, the development of strategic sites will require key services to be provided. | Significant positive effects likely over the medium to longer term as development is delivered. |
| Cumulative effect resulting in the opportunity to offer everybody rewarding and satisfying employment. | Policy CS11 within the Core Strategy advocates a support for growth in the Bury St Edmunds economy. Policies BV13 - BV17 of the Bury St Edmunds Vision 2031 Submission Draft document proposes the designation of Bury St Edmunds employment sites. Combined, these policies should offer an improvement in the number of opportunities available for people to access rewarding and satisfying employment. | Significant positive effects likely over the medium to longer term as development is delivered. |
| Cumulative effects of meeting the housing requirements of all communities within the Bury St Edmunds settlements of St Edmundsbury. | Cumulatively the national and regional housing targets, alongside policies within the Core Strategy and Bury St Edmunds Vision 2031 Submission Draft document will meet the delivery requirements of St Edmundsbury. | Significant positive effects developing over the medium and longer term as more development opportunities are realised. |
| Cumulative effect on water | An increase in population may lead to a net | Significant negative |

| | | |
|--|---|---|
| and air quality | increase in overall traffic volumes and water usage, despite efforts to construct efficient new development in sustainable locations within the Borough. | effects developing over the medium to longer term as more development occurs and is occupied. |
| Cumulative effect on the loss of greenfield land to development. | Core Strategy policies CS1 and CS14 interpret national policy and provide the local approach to sequential development. As a result, the proposed Bury St Edmunds Vision 2031 Submission Draft document favours development on previously developed land. However, in order to meet housing delivery requirements it will be necessary to develop greenfield land in a number of large strategic sites. | Significant negative effects developing over the medium to longer term as more greenfield development is completed. |
| Cumulative effects on the environment and contributions to climate change. | Greenhouse gas emissions arise from a wide variety of sources including transport, construction, waste transfer and the general operation of buildings. Therefore the cumulative effects of realising the proposals set out in the Bury St Edmunds Vision 2031 Submission Draft document is likely to result in an overall increase in contributions to climate change across the plan area. Mitigation measures of other policies in the Core Strategy and Development Management documents may help to temper these effects to some extent. | A significant negative effect becoming increasingly apparent over the medium to longer term. |
| Cumulative effects of Bury St Edmunds economic growth and diversification. | The provisions for strategic economic growth within the Core Strategy and the proposal of employment sites across the Bury St Edmunds area should help to encourage business and investment within the Bury St Edmunds economy. | Significant positive effects likely over the longer term. |

7. Mitigation

- 7.1 The term mitigation encompasses any approach that is aimed at preventing, reducing or offsetting significant adverse environmental effects that have been identified. In practice, a range of measures applying one or more of these approaches is likely to be considered in mitigating any significant adverse effects predicted as a result of implementing the Bury St Edmunds Vision 2031. In addition, it is also important to consider measures aimed at enhancing positive effects. All such measures are generally referred to as mitigation measures.
- 7.2 However, the emphasis should be in the first instance on proactive avoidance of adverse effects. Only once alternative options or approaches to avoiding an effect have been examined should mitigation then examine ways of reducing the scale/importance of the effect.
- 7.3 Mitigation can take a wide range of forms, including:
- Suggested re-wording of some policies in order to improve the likelihood of positive effects and to minimise adverse effects;
 - Technical measures (such as setting guidelines) to be applied during the implementation stage;
 - The effective implementation of relevant Core Policies within the adopted Core Strategy and the forthcoming Development Management DPD;
 - Identifying issues to be addressed in project environmental impact assessments for certain projects or types of projects;
 - Contingency arrangements for dealing with possible adverse effects.
- 7.4 Mitigation measures for each Policy have been considered and recommendations on how to strengthen identified positive effects or minimise negative effects were identified for a number of policies in section 6.

8. Monitoring

- 8.1 The SEA Directive expects that any significant effects arising from the implementation of a plan or programme to be monitored. The effects should be identified at an early stage in order for remedial action to be undertaken.
- 8.2 SA monitoring should encompass social, economic and environmental effects, involving the recognition of the relationship between the implementation of the Bury St Edmunds Vision 2031 and the recognised likely significant sustainability effects.
- 8.3 The guidance recommends that SA monitoring is incorporated into the council's existing monitoring arrangements. Under Section 35 of the Planning and Compulsory Purchase Act 2004 and Regulation 48 of the Town and Country Planning Regulations 2004, councils are required to produce Annual Monitoring Reports (AMRs) in order to assess the implementation of their Local Plan. The integration of the monitoring of significant effects of the Bury St Edmunds Vision document into the AMR document is the most favoured option.
- 8.4 Potential indicators to be employed to monitor such effects are identified in Appendix H. The final framework of AMR monitoring indicators will need to take into consideration those proposed in all SA documents in order to produce a final list of those which will be most effective to monitor the effects of the Local Plan as a whole. The final set of indicators will need to be confirmed subject to consultation with statutory stakeholders.
- 8.5 Significant effects have been identified against all the SA objectives, whether direct, indirect or cumulative. The list below identifies whether after assessment these effects are considered positive, negative or both positive and negative.
- 1 - To improve the health of the population overall and reduce health inequalities (positive effects)
 - 2 - To maintain and improve levels of education and skills in the population overall (positive effects)
 - 3 - To reduce crime and anti-social activity (positive effects)
 - 4 - To reduce poverty and social exclusion (positive effects)
 - 5 - To improve access to key services for all sectors of the population (positive effects)
 - 6 - To offer everybody the opportunity for rewarding and satisfying employment (positive effects)
 - 7 - To meet the housing requirements of the whole community (positive effects)
 - 8 - To improve the quality of where people live and to encourage community participation (positive effects)
 - 9 - To improve water and air quality (both positive and negative effects)
 - 10 - To conserve soil resources and quality (both positive and negative effects)
 - 11 - To use water and mineral resources efficiently, and re-use and recycle where possible (both positive and negative effects)
 - 12 - To reduce waste (both positive and negative effects)
 - 13 - To reduce the effects of traffic on the environment (both positive and negative effects)
 - 14 - To reduce contributions to climate change (both positive and negative effects)
 - 15 - To reduce vulnerability to climatic events (both positive and negative effects)
 - 16 - To conserve and enhance biodiversity and geodiversity (both positive and negative effects)
 - 17 - To conserve and where appropriate enhance areas of historical and archaeological importance (both positive and negative effects)

18 -To conserve and enhance the quality and local distinctiveness of landscapes and townscapes (both positive and negative effects)

19 - To achieve sustainable levels of prosperity and economic growth throughout the plan area (positive effects)

20 - To revitalise town centres (positive effects)

21 - To encourage efficient patterns of movement in support of economic growth (positive effects)

22 - To encourage and accommodate both indigenous and inward investment (positive effects)

8.6 The monitoring programme will be confirmed at the time of adoption of the Bury St Edmunds Vision 2031. The programme may still evolve after consultation with the public and environmental professionals and the identification of additional data sources. There will need to be careful consideration of the practicalities of monitoring indicators, balancing effectiveness and achievability.

9. Conclusions

- 9.1 This document provides the sustainability appraisal in terms of social, economic and environmental factors which accompanies the Bury St Edmunds Vision 2031 Submission Draft document on consultation. It summarises the baseline conditions and key issues in the Borough and Bury St Edmunds. A comprehensive review of the key plans, programmes and strategies was undertaken to consider the wider context within which the Bury St Edmunds Vision 2031 document and other Local Plan documents will function.
- 9.2 After developing an understanding of the plan area, the overall Vision document was appraised against a set of sustainability objectives. These objectives have been used consistently throughout the assessment of the Local Plan in order to determine its sustainability.
- 9.3 The Vision document contains generic and topic specific policies which further the promotion of sustainable development already enshrined in the adopted St Edmundsbury Core Strategy. These policies set out the presumption in favour of sustainable development, define settlement boundaries, support exploring district heating network opportunities and the use of Community Infrastructure Levy and Allowable Solutions funding for carbon dioxide reduction projects, the provision of educational establishments, allotments, green infrastructure and the conservation of the historic core of Bury St Edmunds through the development of the Masterplan. The Vision also includes site specific policies.
- 9.4 The results of this sustainability appraisal demonstrate that the Bury St Edmunds Vision's policies and the individually proposed allocations included within the Vision document are broadly compatible with St Edmundsbury's sustainability objectives. This compatibility has been enhanced during the last iteration of the document update, as most of the SA recommendations set out previously as a result of the 2012 appraisal have been taken on board by the Council.
- 9.5 Where possible, PDL has been considered first for development as a result of the sequential approach. However, the availability of PDL is relatively low in Bury St Edmunds, and a number of allocations, namely all five strategic allocations for mixed use (North West Bury St Edmunds, Moreton Hall Bury St Edmunds, West Bury St Edmunds, North East Bury St Edmunds and South East Bury St Edmunds) and the strategic allocation for employment use at Moreton Hall are located on greenfield land. A substantial amount of them also represent best and most versatile agricultural land (Grade 2 and 3a); the loss of which has negative sustainability implications. The SA recommends that the loss of soil resources is mitigated by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an afteruse appropriate to the soil's quality).
- 9.6 The majority of sites lie within groundwater source protection zones and major aquifer areas. The results of the 2012 SA identified the need for the mitigation measures to ensure that the impact of the developments is minimal. The Council has taken this on board and the updated Vision document stipulates that water quality and water availability mitigation measures are considered and implemented in advance of the development taking place where necessary.
- 9.7 The allocations of the five mixed use strategic sites in Bury St Edmunds perform well from a social perspective due to the delivery of significant number of new housing (potentially a total of 4350 homes), including affordable housing, the sites' proximity to the key services and facilities in the town centre; incorporation of public transport links, pedestrian and cycle routes, amenity space and green corridors; provision of new high quality strategic public open space and recreation facilities and delivery of additional education, community and leisure facilities in the new local hubs to meet the needs of the development and create a sense of place. These provisions will help deliver benefits for public health, help achieve positive integration with the wider area, stimulate community interaction and cohesion, enable access to education and employment opportunities and improve the quality of the living environment.

- 9.8 From an environmental perspective, new development at these strategic sites will result in a number of environmental effects relating to water, soil and air media and will lead to an increase in natural resources use and waste arisings generation. However, the incorporation of cycling and walking links and green corridors provides opportunities for synergies with green infrastructure, delivering positive effects on the quality of the local environment and wildlife.
- 9.9 Positive economic performance is expected from these strategic allocations as they are likely to stimulate developers' interest and investment. The strategic sites will host a relocated hospital (in the long term), a relocated football club and B1 Use Class local employment, all providing employment opportunities and bringing investment into the local economy. In addition, the support for sustainable modes of transport and the provision of relief roads for some of the sites should encourage efficient patterns of movement in support of economic growth.
- 9.10 The Vision document also allocates a number of residential/mixed use sites, potentially delivering a total of 838 homes. These sites perform well from a social perspective for the same reasons outlined above for the strategic allocations. Importantly, all sites are in proximity to public transport routes. This should help reduce traffic volumes generated from private journeys by car. All of the sites which incorporate a residential aspect of development meet the affordable housing threshold included in Policy CS5 of the adopted Core Strategy. This will have a significant positive impact in terms of meeting the housing needs of the whole community.
- 9.11 The four proposed mixed use sites (Station Hill, Tayfen Road, Cotton Lane and Ram Meadow) perform the best in economic terms due to the local employment opportunities that are likely to be created within them.
- 9.12 The identified environmental issues relate to the fact that more than half of the sites lie within flood risk areas (Bury St Edmunds Garden Centre, Shire Hall, Weymed, Almoners Barn and Cotton Lane) and many sites are in the proximity to national ecological designations with the exception of Bury St Edmunds Garden Centre, Jacqueline Close, Hospital Site and Almoners Barn. Some sites have listed buildings in their vicinity and lie in areas of archaeological importance (Shire Hall, Weymed, Land at School Yard, Cotton Lane and Ram Meadow). Mitigation measures will be required to ensure that the impact of these developments is minimal. These findings were presented in the 2012 SA and the Council has considered them during the revision of the Vision document. The updated document stipulates that the design of new development should be sympathetic to sensitive environmental and heritage features and any potential adverse effects should be mitigated. The revised SA additionally recommends that qualified historic environment consultants should be involved in the development of the sites where there is a need for a systematic archaeological assessment.
- 9.13 The employment and alternative commercial uses allocations in the Vision document, perform relatively well from a sustainability perspective as they are all allocations on brownfield land and exhibit relatively few environmental constraints. However, allocations at Moreton Hall, Anglian Lane, Barton Road, Suffolk Business Park, Chapel Pond Hill and Bury St Edmunds Retail Park are in the proximity of national ecological sites. There are also concerns over accessibility from local roads to these sites. Mitigation measures will be required to ensure that the impact of these developments is minimised.
- 9.14 The nine existing Local Centres are the least constrained of all, apart from the allocation at Moreton Hall, which represents the loss of best and most versatile agricultural land and the allocations at Barton Road, Moreton Hall and Stamford, which are in the proximity of European ecological designations. However, the HRA Screening demonstrated that individual site allocations and policies within the Bury St Edmunds Vision 2031 Submission Draft are not likely to have a significant effect on any European site either alone or in-combination.
- 9.15 The Vision document also allocates land for uses such as outdoor recreational use (Land West of Rougham Hill), airfield (Rougham Airfield), health care (West Suffolk Hospital and St. Nicholas Hospice) and education (West Suffolk College). These allocations exhibit very few constraints apart for their location in the vicinity of either national or non-statutory ecological designations.

- 9.16 Overall, the Bury St Edmunds Vision 2031 document is likely to have significant positive effects on most social and economic objectives, with significant positive effects predicted in relation to improving opportunities for access to education, employment, recreation, health, community services and cultural opportunities for all sections of the community; protecting or enhancing the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings; enhancing the viability and vitality of the town centre of Bury St Edmunds; and making the best use of PDL and existing buildings.
- 9.17 The potential for negative effects is predicted against water consumption levels and the quality of water resources; flood risk; the generation and management of waste; transport levels and traffic congestion; noise and air quality pollution; the quality of countryside; and an increase in greenhouse gas emission levels. This is explained by the sheer amount of new development to be delivered during the Vision Document period and its implications in terms of resource and materials consumption levels and pressures placed on natural assets and ecosystem services.
- 9.18 However, it is concluded that through the effective implication of policies included within the Local Plan, combined with national policies and the use of appropriate technique, the impact of built development can be reduced. This is particularly relevant in terms of sustainable design and the use of resources, the protection of local distinctiveness and identity, mitigation of potential negative effects placed on local ecological assets and ecosystem services such as provision of fresh water, clean air and regulation of climate.

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