

**Forest Heath District and St Edmundsbury Borough
Councils'
Joint Development Management Policies
Submission Document**

**Sustainability Appraisal
(Incorporating Strategic Environmental Appraisal)**

**Addendum 2013
Summary Appraisal of Alternative Options**

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1. Introduction

- 1.1 Sustainability Appraisal (SA) is an iterative process that takes place as local plan documents are prepared, consulted upon, amended and submitted for independent examination. Following completion of and consultation on the Joint Forest Heath and St Edmundsbury Development Management document and the accompanying Sustainability Appraisal (incorporating the Strategic Environmental Assessment) (October to December 2012) the advice of Counsel was sought by the two authorities on the requirement in Regulation 12 that the SEA should identify, describe and evaluate the likely significant effects on the environment of “(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.” Case law, specifically *Cogent Land LLP v. Rochford District Council* had determined that a permissible approach to ensure that the SEA process as a whole meets the relevant requirements is to produce an addendum to a submitted SEA. This approach was found to be lawful in the *Cogent* case, and so it was decided to carry out an assessment of reasonable alternatives to the Development Management Policies as an addendum to the SA/SEA.
- 1.2 This document is therefore an addendum to, and must be read with the Sustainability Appraisal (incorporating the Strategic Environmental Assessment) published for consultation in October 2012. It is an additional appraisal of reasonable alternatives to the policies in the document, and as such this work does not supersede any of the original SA/SEA. It sets out consideration of the alternatives and an assessment of the likely significant effects on the environment of these for each policy in the Joint Development Management Document. They were considered and assessed taking into account the objectives and the geographical scope of the plan or programme. These assessments are set out in Appendix H.

2. Sustainability Appraisal

- 2.1 Under the regulations¹ implementing the provisions of the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is required for all Local Development Documents (LDDs). The purpose of SA is to promote sustainable development through better integration of sustainability considerations in the preparation and adoption of plans. The National Planning Policy Framework (NPPF) stipulates that SA of LDDs should “be an integral part of the plan preparation process” (paragraph 165) and meet the requirements of the SEA Directive (see section 3 ‘Strategic Environmental Assessment’ below).
- 2.2 There are many definitions of sustainable development. The National Planning Policy Framework (NPPF) published in March 2012 refers to Resolution 42/187 of the United Nations General Assembly definition of sustainable development as “meeting the needs of the present without compromising the ability of future generations to meet their own needs”. It also refers to the UK Sustainable Development Strategy ‘Securing the Future’, which sets out five guiding principles of sustainable development:

¹ Town and Country Planning (Local Planning) (England) Regulations 2012.

living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

- 2.3 The requirement to prepare a Sustainability Appraisal Report arises directly from Article 5.1 of the SEA Directive which states that:

'An Environmental Report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated.'

- 2.4 The SA is intended to inform the decision making process during preparation of DPDs to ensure that potential sustainable development implications of the document are identified and recognised in the choices made by the local planning authority (LPA). The Sustainability Appraisal Report (October 2012) reported on the work undertaken during the stages of the SA process and on the significant social, environmental and economic effects of the preferred policies, proposed mitigation measures and proposals for monitoring significant sustainability effects. This Addendum reassesses the policies against the 'reasonable alternatives'.

3. Strategic Environmental Assessment

- 3.1 The EU Directive 2001/42/EC on the assessment of effects of certain plans and programmes on the environment (the 'SEA Directive') came into force in the UK on 20 July 2004 through the Environmental Assessment of Plans and Programmes Regulations 2004.

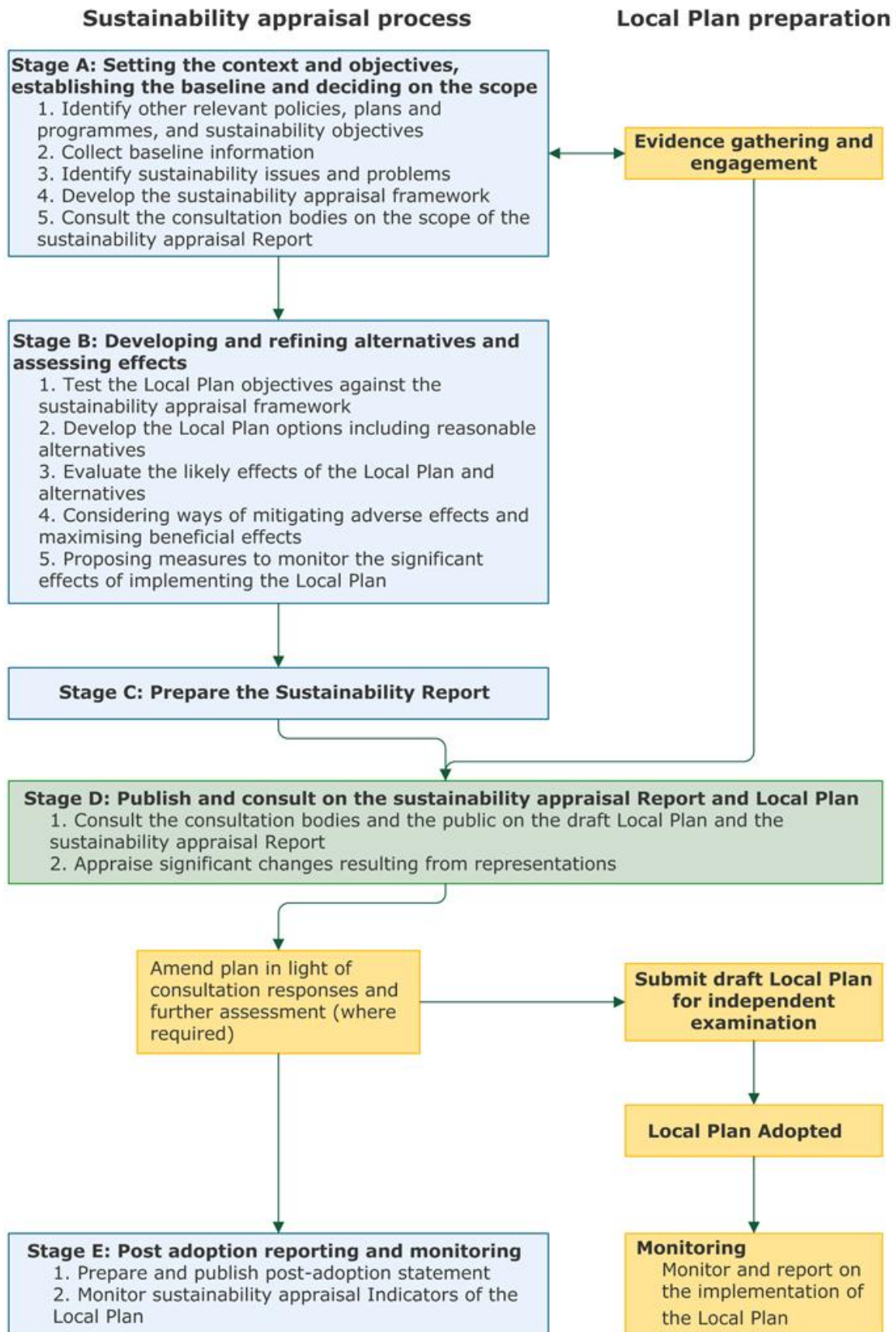
- 3.2 The Directive applies to a variety of plans and programmes including those for town and country planning and land use. Local Plans are prepared and adopted by an authority at the local level and are required by legislative provisions. They are prepared for the purposes of town and country planning/land use and are likely to have significant effects on the environment. It is therefore the case that the Local Plans (formerly referred to as DPDs and SPDs prepared as part of the St Edmundsbury and Forest Heath Local Development Framework [LDF]) are required to be subject to environmental assessment, under the SEA Directive.

- 3.3 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)

- 3.4 The National Planning Practice Guidance (published in Beta as a consultation draft in August 2013) sets out a flow chart to illustrate how

the sustainability appraisal process runs alongside the local plan preparation process:



- 3.5 The diagram shows how SEA is an iterative assessment process which plans and programmes are now required to undergo as they are being developed, to ensure that potential significant environmental effects arising from the plan/programme are identified, assessed, mitigated and communicated to plan-makers. SEA also requires the monitoring of significant effects once the plan/programme is implemented.
- 3.6 The SEA Directive and the SEA Regulations state that the SEA must consider the following topic areas:
- Biodiversity;
 - Population;
 - Human Health;
 - Flora and Fauna;
 - Soil;
 - Water;
 - Air;
 - Climatic Factors;
 - Material assets;
 - Cultural heritage, including archaeological and built heritage;
 - Landscape; and
 - The interrelationship between these factors.

4. Habitats Regulation Assessment (HRA)

- 4.1 HRA is required where a plan contains proposals that are likely to have a significant effect on a Special Protection Area (SPA) or Special Area of Conservation (SAC) collectively known as European sites. The requirement arises from the Conservation of Habitats Regulations 2010.
- 4.2 An HRA Stage 1: Screening Report has been produced, which assesses the potential for likely significant effects of the policies within the plan on the following designated European sites in the district and borough:
- Breckland SPA;
 - Breckland SAC;
 - Waveney and Little Ouse Valley Fens SAC;
 - Rex Graham Reserve SAC; and
 - Devils Dyke SAC.
- 4.3 Potential effects on internationally protected sites within 20 km of the borough/district boundaries are also considered in the HRA. These sites are:
- Redgrave and South Lopham Fens Ramsar site;
 - Norfolk Valley Fens SAC;
 - Fenland SAC;
 - Chippenham Fen Ramsar site;
 - Wicken Fen Ramsar site; and
 - Ouse Washes site (which has three designations SAC, Ramsar, SPA but the same site boundary).

4.4 The results of the HRA have been considered in the preparation of the original SA Report (October 2012).

5. Consideration of Alternatives to Development Management Policies

5.1 The two Councils' Core Strategy Documents set out strategic policies that make provision for development and growth, set the number of new dwellings to be provided, and outline broad locations for growth to 2031 (2026 & 2031 in Forest Heath). The purpose of the Joint Development Management Policies Document (JDMPD) is to identify local characteristics and issues and set out detailed criteria based policies to guide, enable and control development and to ensure that development fits within the context and character of the two local authority areas.

5.2 The allocation of sites to deliver the housing numbers and other growth aspirations that are set out in the two authorities' Core Strategy documents will be the subject of a Site Specific Allocations Local Plan in Forest Heath, and the three Vision 2031 documents in St Edmundsbury (Bury St Edmunds Vision 2031 Local Plan, Haverhill Vision 2031 Local Plan and the Rural Vision 2031 Local Plan).

5.3 As the JDMPD does not allocate sites for development considering reasonable alternatives to the policies is therefore relatively straightforward. In fact, these considerations have been part of the process across the different versions and iterations of the document, but they have not been clearly articulated. It is therefore considered necessary to identify the reasonable alternatives to the policies in the JDMPD and subject them to assessment using the two authorities' Sustainability Issues and Sustainability Assessment Objectives.

5.4 Apart from relatively minor changes to the wording or layout of the policies a realistic alternative to all of the policies is to rely entirely on national policy as set out in the NPPF and on the strategic policies in the two Core Strategy Documents. There are broadly two other reasonable alternatives: shorter, less specific policies; or in one case, a further alternative of a more restrictive policy.

5.5 Consideration of a Development Management set of policies for St Edmundsbury emerged during the Core Strategy process. At that time Local Development Frameworks comprised a 'portfolio' of documents comprising the Core Strategy and usually a site specific allocations and/or development management document(s). Similarly, in Forest Heath this LDF process had already commenced. The decision to work on and development of a Joint DM Policies Document coincided with changes to the process at national level (that specifies that single local plan documents should encompass all relevant policies for the plan area, and that the status of all development plan documents is that that they are all local plans), and also coincided with the publication of the NPPF.

5.5 As set out in paragraph 2.2 above, this Addendum to the SA/SEA seeks to articulate the reasonable alternatives to the policies in the submission draft of the JDMP document.

6. The SA/SEA Addendum

6.1 As referred to in paragraph 1.2 above this Addendum is a focused exercise that should be read as an addition to the SAR published in October 2012 and not a replacement for part or parts of the original document.

7. Methodology

7.1 The appraisal of reasonable alternatives to the policies in the JDMPD follows the methodology set out in section 2.11 of the original SA/SEA. This uses the assessment matrices for each authority, summarising the six point scale characterising the magnitude of predicted effects in terms of the change to the current baseline and rating the impact for each alternative considered using the sustainability effects scoring matrix set out below.

Sustainability Effects Scoring

Magnitude	
++	Major positive impact
+	Minor positive impact
0	Neutral
-	Minor negative
--	Major negative
?	Unclear effects

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

7.2 The policies of the JDMPD complement those of the two Core Strategies. The relationship between the JDM policies and the policies in the two authority's Core Strategies is set out in Table 12.1 of the SA/SEA published and consulted upon in October 2012.

7.3 A detailed assessment of each of the plan policies (JDMP) was carried out in the SA/SEA using separate assessment sheets (Appendices B, C, D and E). In this addendum the first step in assessing the likely and significant effects of the policies and the extent to which implementation of these policies will achieve the social, environmental and economic objectives by which sustainable development can be defined was to assess the policies

and determine whether they are necessary, or whether the two authorities could rely on policies in their Core Strategies (and national policy set out in the NPPF). The second step was to consider the impact that a shorter, less specific/less restrictive policy would have, and in one case a further option was assessed which was the impact of a more restrictive policy. The results of these assessments are set out in Appendix H.

8. Assessment of SEA Addendum Findings

- 8.1 Appendix G identifies and describes the reasonable alternatives to the policies included in the JDMPD submission draft (that was the subject of consultation from October to December 2012) taking into account the objectives and the geographical scope of the plan. The reasons for not pursuing each of these alternatives in preference to the policies in the document is supported by the summary assessment matrices for each alternative which were considered against the SA objectives for each of the two authorities (Appendix H).
- 8.2 In the first section of the JDMPD, policies DM1, DM2, DM3, DM4, and DM5 seek to build on the presumption in favour of sustainable development setting out principles and criteria for “creating places”, that is focussing on principles of good design and respect for the local character and distinctiveness of the built environment. This includes circumstances where Masterplans and Development Briefs will be appropriate, principles for respecting the rural character of West Suffolk. The only reasonable alternative to this set of policies would be for the two authorities to rely on the NPPF and their Core Strategy documents. The assessment of this alternative for these policies is that not having policies DM1 to DM5 would have a cumulative and long term detrimental effect on the quality, character and environment of West Suffolk and make it unlikely that the SA objectives of the two authorities could be met.
- 8.3 Policies DM6, DM7, DM8, DM9 and DM10 address local characteristics and circumstances relating to climate change, energy efficiency and the impact of infrastructure services and development on the local area. In the case of five policies the assessment indicates that not having the policies and relying on the NPPF and the Core Strategy documents would have a cumulative and long term detrimental effect on the quality, character and environment of West Suffolk and make it unlikely that the SA objectives of the two authorities could be met. In the case of policies DM9 and DM10 the alternative of having shorter, less specific policies was assessed, and the outcome was the same.
- 8.4 The JDMPD seeks to protect nature conservation and other designated sites and protected species from the impacts of development, and provides for mitigation, enhancement, management and monitoring of biodiversity in policies DM11, DM12 and DM13, and addresses the environmental issues of safeguarding from hazards in policy DM15. The only reasonable alternative to this set of policies would be to rely on the NPPF and Core Strategy documents. The assessment of this alternative for these policies is that not having policies DM11 to DM15 would have a cumulative and long term detrimental effect on the biodiversity,

geodiversity and natural environment of West Suffolk and make it unlikely that the SA objectives of the two authorities could be met.

- 8.5 Policies DM16 to DM22 inclusive seek to protect heritage assets and the distinctive historic character of the built environment in the borough and district. There were no positive scores for not having these policies, and in the case of policies DM18 and DM22 no positive scores for having shorter, less specific policies.
- 8.6 Policies DM23 to DM29 set out policies that will help both authorities achieve their common objective of delivering housing in a sustainable way. The assessment indicates that, overall, not having this set of policies would have a detrimental impact on sustainability objectives, this would also be the case with policy DM25 where having a shorter, less specific policy was assessed. In all cases, not having these policies would also have a detrimental impact on the ability of the authorities to achieve their SA objectives.
- 8.7 The policies in section six of the JDMPD set out the local context and criteria for sustainable economic development in the urban and rural areas of Western Suffolk, including tourism, equine related activities, and farm diversification. For policies DM30, DM31, DM32, and DM34 the only reasonable alternative would be to rely on the NPPF and their Core Strategy documents. Not having these policies would have a cumulative and long term detrimental effect on the quality, character and environment of West Suffolk and make it unlikely that the SA objectives of the two authorities could be met.
- 8.8 In the case of policy DM33 two further alternatives were assessed in addition to the alternative of not having the policy. These were to have a shorter, less specific policy, and also to have a more prohibitive/restrictive policy. The assessment of the latter alternative for Forest Heath shows one positive score (Objective 15: to protect the District's vast biodiversity natural capital), and for St Edmundsbury shows two positive scores (Objectives 16 and 18: To conserve and enhance the quality and local distinctiveness of landscapes and townscapes, and to conserve and enhance biodiversity and geodiversity, respectively), however, overall the policy would be likely to have a positive effect on the sustainability objectives of the two authorities.
- 8.9 Section seven of the plan comprises locally specific policies for: proposals within town centres, the protection of local centres, public realm improvements, shop front and advertisements, street trading and street cafes and ancillary retail uses; and for the provision and enhancement of community facilities and services, open space, sport and recreation facilities, and leisure facilities, and for the protection of rights of way. These policies are specific to the local context, detailed, criteria based policies that are inappropriate for Core Strategy documents, and build on the broad brush of national policy set out in the NPPF. Not having this set of policies would have a cumulative and long term detrimental effect on the quality and character of the built environment and the social

infrastructure of West Suffolk and making it unlikely that the SA objectives of the two authorities could be met in these areas.

- 8.10 Policies DM45 and DM46 require transport assessments and travel plans for major development and/or where development would have significant transport implications, seek to reduce over-reliance on car travel by restricting the level of car parking in town centres and where there is good accessibility by public transport. Although both authorities' Core Strategies include policies that seek to promote sustainable transport measures and reduce the need for travel these are not detailed policies that could be used to secure these measures through development proposals, and therefore it is no surprise that not having these policies in the plan would have a detrimental impact on the ability of the two authorities to achieve their SA objectives in this area. No other alternatives to these policies were identified.
- 8.11 Policies DM47 to DM51 are specific Forest Heath policies to guide and enable development relating to and affecting the unique relationship of the horse racing industry with the built environment and character of Newmarket. Policy DM50 could be seen as repeating elements of Policy DM22, however, the policy addresses the specific economic, social and historic circumstances of the horse racing industry in Newmarket and not having this policy and the other Newmarket specific policies in this section would have a detrimental impact on the town, and on the ability of Forest Heath to achieve several of its SA objectives.
- 8.12 Policy DM52 is specific to St Edmundsbury to make provision for rural exception sites. This policy builds on national policy and has a major impact on two of St Edmundsbury's SA objectives.
- 8.13 In conclusion, there was no case where not having a DM policy and relying on Core Strategy policies and/or the NPPF would be the more sustainable option. Whilst both councils each have a number of policies in their respective Core Strategies that would cover aspects of some of these policies having specific policies in a Development Management document scores positively in terms of meeting the authorities SA objectives. Conversely, not including these DM policies is likely to result, in all cases, in a cumulative impact over time that would be detrimental to achieving the SA objectives.

9. Consulting on the SEA Addendum

- 9.1 Consultation on the SA/SEA of the Submission draft of the Joint Development Management Policies Document took place between October and December 2012. This SEA Addendum will be the subject of a six week period of consultation commencing late November 2013 (subject to committee approval). The document and any representations received as a result of the consultation will be submitted with all other documents for Examination.

9.2 The National Planning Practice Guidance advises on the role of Sustainability Appraisal at examination of the Local Plan (the JDMF document):

What is the role of the sustainability appraisal at examination of the Local Plan?

The Sustainability Appraisal should be submitted with the Local Plan to the Secretary of State for independent examination. The sustainability appraisal will be examined as part of the evidence base for the Local Plan and should be accompanied by a statement which sets out:

- who has been consulted during the preparation of the Local Plan, including the preparation of the sustainability appraisal;
- how they have been involved;
- a summary of the main issues raised; and
- how the main issues have been taken into account as a result of consultation.

Will the sustainability appraisal have to be amended if modifications to the Local Plan are proposed at examination?

It is up to the local planning authority to decide whether the sustainability appraisal should be amended following proposed changes to a draft plan. A local planning authority can ask the Inspector to make changes to the draft Local Plan to make it sound or they can propose their own changes. If the local planning authority assesses that the proposed changes are significant then the sustainability assessment should be updated and amended accordingly.

Extract from the National Planning Practice Guidance September 2013

10. Compliance with the SEA Directive and Regulations

10.1 Table 2.4 of the SA shows how it complies with the requirements of the SEA Directive for environmental assessment of plans. The SEA Addendum has been produced to make explicit consideration of reasonable alternatives, and consequently it is considered that there is no need to repeat the analyses and assessments carried out for the original document.

10.2 No difficulties were encountered in compiling the additional assessment of alternatives² addendum to the SA. A description of the measures envisaged concerning monitoring is set out in the SA together with a non-technical summary of the information provided as described under paragraphs 1 to 9 in Schedule 2 of the Regulations.

² Environmental Assessment of Plans and Programmes Regulations 2004 (Schedule 2)

11. Conclusion

- 11.1 This Addendum to the SA/SEA has considered realistic alternatives to the policies published for consultation in the Joint DM DPD in October 2012, and concludes that there would be detrimental impacts on achieving the two authorities' SA objectives if there were no DM policies and the authorities relied on the policies in their Core Strategies; that in the case of five policies shorter, less restrictive policies would, overall, have the same detrimental impact; and in the case of one policy a third option of having a more restrictive policy would also have a detrimental impact on the ability of the two authorities to achieve their SA objectives.
- 11.2 The conclusion of this appraisal of alternatives is that there is no need to change the JDMPD, but that as an additional explicit exercise it has added clarity to the SA/SEA process by setting out comparative matrices that demonstrate that the DM policies in the published document will, overall, help the two authorities meet their SA objectives.

Summary of Assessment of alternatives to the Joint Development Management Document Policies

DM1 Presumption in Favour of Sustainable Development

Options considered and decision taken:

Do not include PINS model policy Reject option (X)

Include PINS model policy. ✓

Summary of reasoning:

The Planning Inspectorate considers that the model policy wording will be an appropriate way of meeting the Government's expectation, set out in the NPPF, that Local Plans should be based upon the presumption in favour of sustainable development. The two councils note and accept this advice. To not include the policy would be inconsistent with national planning policy. No local or specific advantage in changing the model policy wording.

DM2 Creating places – development principles and local distinctiveness

Options considered and decision taken:

1. Do not include a policy and rely on policies in the Councils' Core Strategies X

2. Include policy as set out in the Joint Development Management Policies (JDMP) Document ✓

Summary of reasoning:

Option 1 rejected. Whilst existing policies in the Councils' Core Strategies would provide a certain level of protection in terms of local distinctiveness, it is considered that additional guidance on good design and protection for the locally distinctive built and natural environment is needed to achieve the desired objectives.

DM3 Masterplans

Options considered and decision taken:

1. Do not require Masterplans X

2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 1 rejected as the policy would help provide certainty and a transparent and consistent approach to delivering major development in the two council areas.

DM4 Development Briefs

Options considered and decision taken:

1. Do not require Development Briefs X
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 1 rejected as the policy would help provide certainty and a transparent and consistent approach to delivering major development in the two council areas.

DM5 Development in the Countryside

Options considered and decision taken:

1. Not including a policy and relying on policies in the two Councils' Core Strategies.
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 1 rejected. A policy approach which relied solely on policies in the Core Strategies would allow for some limited residential development in the countryside. However, there would not be the same level of certainty with regards to what development would be allowed in the countryside. Inadequate policy guidance would be given on dwelling extensions and replacement dwellings in the countryside.

DM6 Flooding and Sustainable Drainage

Options considered and decision taken:

1. Not including a policy and relying on policies in the two Councils' Core Strategies. X
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 1 rejected. Option 2 provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM7 Sustainable Design and Construction

Options considered and decision taken:

1. Not including a policy and relying on policies in the two Councils' Core Strategies and the NPPF. X
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 1 rejected. Whilst the two Core Strategies contain policies on sustainable development/sustainable construction, having a detailed policy will provide certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM8 Improving Energy Efficiency and Reducing Carbon Dioxide Emissions

Options considered and decision taken:

- 1. Not have a policy. X
- 2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Whilst the two Core Strategies contain policies that cover aspects of improving energy efficiency and reducing carbon dioxide Option 2 provides more detailed guidance, certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM9 Low and Zero Carbon Energy Generation

Options considered and decision taken:

- 1. Not have a policy. X
- 2. Include a shorter, less specific policy X
- 3. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 1 rejected. Option 2 would provide less certainty regarding potential impacts of renewable energy projects on the local landscape and townscape, nature conservation and tourism. Option 3 provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM10 Infrastructure Services and Telecommunications Development

Options considered and decision taken:

- 1. Not have a policy. X
- 2. Include a shorter, less specific policy X
- 3. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 1 rejected. Option 2 would provide less certainty regarding potential impacts of renewable energy projects on the local landscape and townscape,

nature conservation and tourism. Option 3 provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM11 Impact of Development on Sites of Biodiversity and Geodiversity Importance

Options considered and decision taken:

1. Not have a policy. X
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM12 Protected Species

Options considered and decision taken:

1. Not have a policy. X
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM13 Mitigation, Enhancement, Management and Monitoring of Biodiversity

Options considered and decision taken:

1. Not have a policy. X
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM14 Landscape Features

Options considered and decision taken:

1. Not have a policy. X
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 1 rejected. Whilst existing policies in the Councils' Core Strategies may provide a certain level of protection for local landscape features, it is considered that additional guidance is needed.

DM15 Safeguarding from Hazards

Options considered and decision taken:

- 1. Not have a policy. X
- 2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 follows the precautionary approach and provides certainty and clarity, and builds on national policy set out in the NPPF.

DM16 Listed Buildings

Options considered and decision taken:

- 1. Not have a policy. X
- 2. Include a shorter, less specific policy X
- 3. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 1 rejected. Option 2 would provide less certainty regarding potential impacts on heritage assets and the historic townscape/landscape. Option 3 provides certainty and clarity and builds on the principles of sustainable development and national policy as set out in the NPPF.

DM17 Local Heritage Assets and Buildings Protected by an Article 4 Direction

Options considered and decision taken:

- 1. Not have a policy. X
- 2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 is locally appropriate and provides an additional level of guidance and information building on national policy as set out in the NPPF and good practice guidance published by English Heritage.

DM18 Conservation Areas

Options considered and decision taken:

1. Not have a policy. X
2. Include a shorter, less specific policy X
3. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 1 rejected. Option 2 would provide less certainty regarding potential impacts on heritage assets and the historic townscape/landscape. Option 3 provides certainty and clarity and builds on the principles of sustainable development and national policy as set out in the NPPF.

DM19 New Uses for Historic Buildings

Options considered and decision taken:

1. Not have a policy. X
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 is locally appropriate and provides an additional level of guidance and information building on national policy as set out in the NPPF.

DM20 Development Affecting Parks and Gardens of Special Historic or Design Interest

Options considered and decision taken:

1. Not have a policy. X
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 is locally appropriate and provides an additional level of guidance and information building on national policy as set out in the NPPF.

DM21 Archaeology

Options considered and decision taken:

1. Not have a policy. X
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 is locally appropriate and provides an additional level of guidance and information building on national policy as set out in the NPPF.

DM22 Enabling Development

Options considered and decision taken:

1. Not have a policy. X
2. Include a shorter, less specific policy X
3. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Whilst English Heritage have published guidance 'Enabling Development and the Conservation of Significant Places' (2008) that stresses that enabling development should only be carried out as a last resort Option 1 is rejected (see Option 3). Option 2 would provide less certainty regarding potential impacts on heritage assets and the historic townscape/landscape. Option 3 provides policy status for this locally important issue. It also provides certainty and clarity and builds on the principles of sustainable development and national policy as set out in the NPPF.

DM23 Residential Design

Options considered and decision taken:

1. Not have a policy. X
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM24 Special Housing Needs

Options considered and decision taken:

1. Not have a policy. X
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 is locally appropriate and provides an additional level of guidance and information and builds on the principles of sustainable development as set out in the NPPF.

DM25 Alterations or Extensions to Dwellings, including Self Contained Annexes and Development within the Curtilage

Options considered and decision taken:

1. Not have a policy. X
2. Include a shorter, less specific policy X
3. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 1 rejected. Option 2 would provide less certainty and clarity. Option 3 is locally appropriate and provides an additional level of guidance and information building on the principles of sustainable development as set out in the NPPF.

DM26 Extensions to Domestic Gardens with the Countryside

Options considered and decision taken:

1. Not have a policy. X
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 is locally appropriate and provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM27 Agricultural and Essential Workers Dwellings

Options considered and decision taken:

1. Not have a policy. X
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 is locally appropriate and provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM28 Housing in the Countryside

Options considered and decision taken:

1. Not have a policy. X
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 is locally appropriate and provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM29 Residential use of Redundant Buildings in the Countryside

Options considered and decision taken:

1. Not have a policy. X
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 is locally appropriate and provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM30 Appropriate Employment Uses and Protection of Employment Land and Existing Buildings

Options considered and decision taken:

1. Not have a policy. X
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 1 rejected. Option 2 – the policy is based on local evidence and is considered necessary to provide certainty and clarity and to provide an additional layer of local guidance building on the principles of sustainable development as set out in the NPPF.

DM31 Farm Diversification

Options considered and decision taken:

1. Not have a policy. X
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 is locally appropriate and provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM32 Business and Domestic Equine Related Activities

Options considered and decision taken:

1. Not have a policy. X
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 is locally appropriate and provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM33 Re-Use or Replacement of Buildings in the Countryside

Options considered and decision taken:

- | | |
|---|---|
| 1. Not have a policy. | X |
| 2. Include a shorter, less specific policy | X |
| 3. Have a more prohibitive policy. | X |
| 4. Include policy as set out in the JDMP Document | ✓ |

Summary of reasoning:

Option 1 rejected. Option 2 would provide less certainty regarding potential impacts on the natural environment and may lead to less sustainable development. Option 3 would prevent the sustainable re-use of suitable buildings; be potentially detrimental to meeting the development needs of the area contrary to the principles of sustainable development set out in the NPPF. Option 4 is locally appropriate and provides flexibility and an additional level of guidance and information.

DM34 Tourism Development

Options considered and decision taken:

- | | |
|---|---|
| 1. Not have a policy. | X |
| 2. Include policy as set out in the JDMP Document | ✓ |

Summary of reasoning:

Option 2 is locally appropriate and provides an additional level of guidance and information building on national policy as set out in the NPPF.

DM35 Proposals within the Town Centre Boundaries

Options considered and decision taken:

- | | |
|---|---|
| 1. Not have a policy. | X |
| 2. Include policy as set out in the JDMP Document | ✓ |

Summary of reasoning:

Option 2 is locally appropriate and provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM36 Protection of Local Centres

Options considered and decision taken:

1. Not have a policy. X
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 is locally appropriate and provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM37 Public Realm Improvements

Options considered and decision taken:

1. Not have a policy. X
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 is locally appropriate and provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM38 Shop Fronts and Advertisements

Options considered and decision taken:

1. Not have a policy. X
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 is locally appropriate and provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM39 Street Trading and Street Cafes

Options considered and decision taken:

1. Not have a policy. X
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 is locally appropriate and provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM40 Ancillary Retail Uses

Options considered and decision taken:

1. Not have a policy. X

2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 provides certainty and clarity and builds on the presumption in favour of sustainable development as set out in the NPPF.

DM41 Community Facilities and Services

Options considered and decision taken:

- 1. Not have a policy. X
- 2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 is locally appropriate and provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM42 Open Space, Sport and Recreation Facilities

Options considered and decision taken:

- 1. Not have a policy. X
- 2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM43 Leisure Facilities

Options considered and decision taken:

- 1. Not have a policy. X
- 2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 is locally appropriate and provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM44 Rights of Way

Options considered and decision taken:

- 1. Not have a policy. X
- 2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM45 Transport Assessments and Travel Plans

Options considered and decision taken:

- 1. Not have a policy. X
- 2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM46 Parking Standards

Options considered and decision taken:

- 1. Not have a policy. X
- 2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 is locally appropriate and provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

Forest Heath Specific Policies – Horse Racing

DM47 Development Relating to the Horse Racing Industry

Options considered and decision taken:

- 1. Not have a policy. X
- 2. Include the locally specific policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 is locally appropriate and provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM48 Development Affecting the Horse Racing Industry

Options considered and decision taken:

- 1. Not have a policy. X

2. Include the locally specific policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 is locally appropriate and provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM49 Re-development of Existing Sites Relating to the Horse Racing Industry

Options considered and decision taken:

1. Not have a policy. X
2. Include the locally specific policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 is locally appropriate and provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

DM50 Securing the Restoration of Horse Racing Related Historic Assets

Options considered and decision taken:

1. Not have a policy. X
2. Include the locally specific policy as set out in the JDMP Document ✓

Summary of reasoning:

The policy refers to Policy DM22: Enabling Development so the question of whether this policy is necessary has been carefully considered. Considering the evidence Option 2 is considered to be an appropriate policy that addresses a local issue providing a specific set of criteria and additional level of guidance and information that builds on national policy as set out in the NPPF.

DM51 Horse Walks

Options considered and decision taken:

1. Not have a policy. X
2. Include the locally specific policy as set out in the JDMP Document ✓

Summary of reasoning:

Option 2 is locally appropriate and provides certainty and clarity and builds on the principles of sustainable development as set out in the NPPF.

St Edmundsbury Specific Policy – Rural Housing Exception Sites

DM52 Rural Housing Exception Sites

Options considered and decision taken:

1. Not have a policy. X
2. Include policy as set out in the JDMP Document ✓

Summary of reasoning:

Forest Heath's Core Strategy Policy CS9: Affordable Housing Provision includes a section on Affordable Housing in the Countryside that covers rural exception sites. St Edmundsbury's Core Strategy Policy CS5: Affordable Housing does not include the rural area nor does it make provision for rural exception sites.

Therefore Option 2 is considered to be necessary and locally appropriate, and provides certainty and clarity and builds on the principles and presumption in favour of sustainable development as set out in the NPPF.