Stradbroke Neighbourhood Plan 2016-2036

Sustainability Appraisal incorporating Strategic Environmental Assessment

April 2018





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1 INTRODUCTION

- 1.1 This document sets out the baseline information on the parish, the plans and policies influencing the production of the Stradbroke Neighbourhood Plan, current sustainability issues that are facing the parish and the sustainability objectives that the Neighbourhood Plan should strive to achieve.
- 1.2 The Stradbroke Sustainability Framework Scoping Report was published by Stradbroke Parish Council in February 2018. It was the subject of consultation with Suffolk Coastal District Council, the Environment Agency, Natural England and Historic England. A summary table of the comments from statutory consultees is contained in Appendix A. The objectives have been amended to take account of the advice and comments received.
- 1.3 The draft Sustainability Appraisal was prepared in March and April 2018. This final version of the document has been amended in the light of representations received at Regulation 14 stage and in light of amendments made subsequently to the Neighbourhood Plan, prior to Submission (Regulation 16).
- 1.4 The commitment to the achievement of sustainable development has been set out in legislation introduced at both European and national level. In 2004 the European Directive on Strategic Environmental Assessment (Strategic Environmental Assessment) was implemented in the UK. This sets out the requirement for Strategic Environmental Assessment, which has been incorporated into the Sustainability Appraisal process. Section 39 of the Planning and Compulsory Purchase Act 2004 requires Local Development Documents to be prepared with a view to contributing to the achievement of sustainable development. The Sustainability Appraisal incorporates the Strategic Environmental Assessment process for ease, this report is referred to as the Sustainability Appraisal from now on in this document, although it incorporates the elements required for Strategic Environmental Assessment.
- 1.5 Sustainable development is about ensuring a better quality of life for everyone, now and for generations to come. It is about considering the long-term environmental, social and economic issues and impacts in an integrated and balanced way. The UK Government has set five guiding principles to achieve the sustainable development purpose. These principles form the basis for policy in the UK and are as follows:
 - Living within environmental limits
 - Ensuring a strong, healthy and just society
 - Building a strong, stable and sustainable economy
 - Promoting good governance
 - Using sound science responsibly
- One of the means by which sustainable development can be achieved is through the land-use planning process. The Stradbroke Neighbourhood Plan will need to be in general conformity with the saved policies of the Mid Suffolk Core Strategy 2008, the Mid Suffolk Core Strategy Focussed Review 2012, the Mid Suffolk Local Plan First Alteration 2006 and the Mid Suffolk Local Plan 1998. If approved by a referendum, the Neighbourhood Plan will become a part of the development plan for the parish of Stradbroke.
- 1.7 The Stradbroke Neighbourhood Plan can help to achieve sustainable development as it aims to ensure that development meets the needs of people living and working in the parish, while at the same time helping to ensure that adverse environmental impact is minimised.

2 METHODOLOGY

2.1 The Stradbroke Neighbourhood Plan area is shown in Figure 2.1 and is contiguous with the parish boundary.

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Figure 2.1: Stradbroke Neighbourhood Plan designated area

- 2.2 The Stradbroke Neighbourhood Plan is being developed through an extensive programme of engagement with the local community. The primary settlement in the parish is Stradbroke village with the majority of the population living within its limits. Therefore the focus of the plan has been on addressing the needs of the community that live within the village.
- 2.3 The Plan has been produced by a Neighbourhood Planning Committee including Parish Council members, working with community volunteers, and in partnership with Mid Suffolk District Council, Suffolk County Council, AECOM, Navigus Planning and Locality.
- 2.4 The Plan provides a vision for the planning of sustainable growth across the parish up to 2036.
- 2.5 In order to deliver the vision for Stradbroke to be a key service centre village for residents and surrounding villages, the Plan sets out to meet a series of place and people-focused objectives:

Place

• Infrastructure and services: support the community of Stradbroke with first rate infrastructure that includes an expanded range of utilities, improved highways, telecom and internet services.

- Built environment: allocate sites for development that retain the historic crossroads shape and character of the village and manage parking and traffic issues.
- Transport and movement: mitigate and manage critical highway pinch points and reduce travel by car or lorry within the village by improving internal connectivity and alternative travel options.
- Business: support local business growth and employment opportunities and actively seek further employment generating opportunities which directly contribute to the welfare of the community.
- Housing: ensure development respects the historical build pattern and style whilst also encouraging design for the future through innovation.
- Environment: promote community safety including issues of pollution, the green economy and protect and nurture green spaces and assets of community value.

People

- Education: support the growing and changing needs of education for all ages and in particular, provide for the needs of the local primary and secondary schools.
- Health: expand the range of health care services available to local residents, as well as addressing the residential and care needs of the community as it ages.
- Sport and leisure: deliver facilities that promote leisure and recreation facilities for all ages and abilities.
- Community: increase community self-sufficiency and resilience by expanding the retail base and range of village community services.
- Housing: provide homes that meet the changing needs of Stradbroke in terms of affordability, size, type and tenure that will allow families and single people to settle, grow and continue to live in the village.
- Transport: to achieve improved transport to services at distance, especially educational services for post-16 students.
- 2.6 The Mid Suffolk Core Strategy (adopted 2008) provides 15 objectives for the development plan, with its Focussed Review (adopted 2012) revising Strategic Objectives SO3 and SO6. However, these policies are dated and it is the emerging Babergh and Mid Suffolk Joint Local Plan that will shape the strategic objectives over the plan period of the Neighbourhood Plan.

3 POLICY CONTEXT

- 3.1 The Stradbroke Neighbourhood Plan is being prepared in accordance with national and local planning policies. At the national level, the National Planning Policy Framework (NPPF) establishes the scope and purpose of neighbourhood plans. At the local level, the development plan of Mid Suffolk comprises the Mid Suffolk Core Strategy 2008, the Mid Suffolk Core Strategy Focussed Review 2012, the Mid Suffolk Local Plan First Alteration 2006 and the Mid Suffolk Local Plan 1998. This will be the case until they are superseded by adoption of the currently emerging Babergh and Mid Suffolk Joint Local Plan. Suffolk County Council's (SCC) Waste Core Strategy makes up the rest of the development plan.
- 3.2 Appendix B provides a summary of the programmes, plans and other documents which influence the Stradbroke Neighbourhood Plan. Key objectives and indicators have been identified from the District Core Strategy and Local Plan and these have been incorporated into the sustainability framework and used to inform baseline data and the identification of key issues.
- 3.3 The aims, objectives and indicators from these policy documents have been used to develop the sustainability objectives. It should be noted that the policy context for the Neighbourhood Plan Sustainability Appraisal is not static. Therefore as further relevant plans or programmes are developed, they will be reviewed and taken into account.
- 3.4 The weight given to policies from the plans above will depend upon the degree to which they conform to the National Planning Policy Framework (NPPF) which in the event of any conflict will take precedence.
- 3.5 The emerging Babergh and Mid Suffolk Joint Local Plan was last in a period of consultation from 21 August to 10 November 2017¹. This is accompanied by a Sustainability Appraisal Scoping Report and will eventually be supported by a Habitats Regulation Assessment (Appropriate Assessment). Table 1.3 of this Scoping Report considered the relationship between the objectives of the Neighbourhood Plan and those of the emerging Joint Local Plan and demonstrates that there is general conformity.
- 3.6 It should be noted that several other parishes in Mid Suffolk are developing neighbourhood plans, such as Eye and Wilby. As such, there could potentially be a residual effect on Stradbroke parish.

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¹ http://www.midsuffolk.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-consultation-document/

4 PARISH CHARACTERISTICS AND ISSUES

- 4.1 The SEA Regulations require that certain environmental topics are included within the environmental baseline collected to inform the SEA. The topics required by the SEA Regulations are shown in Table 4.1.
- 4.2 The SEA Scoping Report summarises the current state of the environment and also identifies key trends and pressures for the future. The information is categorised under topics, although it must be recognised that many of the topics are interlinked.

Table 3.1: Topics and their relevance to the Stradbroke Neighbourhood Plan

Торіс	Relevance to the Stradbroke Neighbourhood Plan
Nature conservation	Potential for new site allocations to impact on the habitats of species within areas of nature conservation value
Landscape	Potential for new site allocations to impact on the landscape
Water	Risk of flooding impacts on where people live and can impact on the economic prosperity of an area. The way in which water is drained off of land, including road and other hard surfaces, can be important to the level of flood risk experienced in an area.
Soils	Potential for site allocations and development to impact on best agricultural soils or important geological sites.
Historic Environment	Historic environment features can be vulnerable to damage and other impacts from neglect, decay or development pressures.
Air and Climate	Potential for new site allocations to create pollution through additional congestion.
Human characteristics	Potential for the plan to impact on human health, particularly positively though improvements to walking, cycling routes, etc
Roads and transport	Development could impact on congestion on the road network and create pedestrian safety problems, particularly at key junctions in Stradbroke village centre
Infrastructure	Development could have an impact on the infrastructure necessary to keep society running smoothly
Economic characteristics	Development could impact on the ability of communities to function effectively (in their interaction with services) and on the economic prosperity of an area.

4.3 The information was compiled from a wide range of information sources. Firstly information came from the draft Neighbourhood Plan and associated work conducted to support it. As part of the widespread consultation work to support the plan this has included feedback from a range of

consultees. There are also a number of key reports relevant to the environment of the area and some of their key findings have been summarised here – they are referenced through the text, as are various data sources used to provide maps and statistics. This section presents topics relevant to the Neighbourhood Plan and while it seeks to be comprehensive only the key issues are included to keep the document manageable.

Nature conservation and biodiversity

- 4.4 The only recognised biodiversity feature of significance in the Neighbourhood Plan Area are two County Wildlife Sites to the east of Stradbroke village. There is also a blanket Tree Preservation Area covering an area in the village.
- 4.5 Immediately adjacent to the north-western boundary of the Neighbourhood Plan Area are two ancient woodlands.
- 4.6 This is shown in Figure 4.1 and in more detail for the areas around Stradbroke village in Figure 4.2

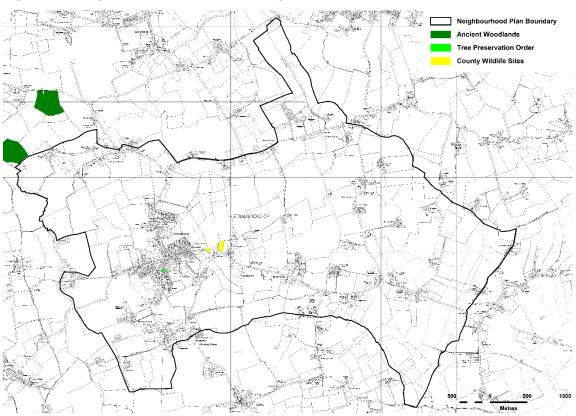


Figure 4.1: Key environmental features - parish

Source: MAGIC, DEFRA

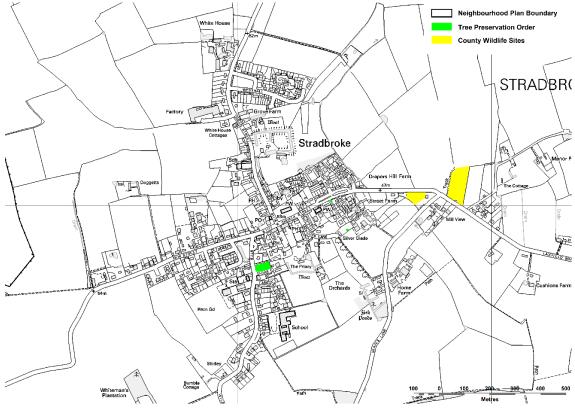


Figure 4.2: Key environmental features – Stradbroke village

Source: MAGIC, DEFRA

Species

- 4.7 Data from the Suffolk Biodiversity Information Service identifies a number of protected species through the Neighbourhood Plan Area. This includes records of protected species at multiple points throughout Stradbroke village. Due to the sensitive nature of this information, it has not been possible to publish the mapping showing the locations of these protected species.
- 4.8 An important issue relating to housing development in Stradbroke is the potential adverse effects that the increased population could have on European designated sites. The Neighbourhood Plan Area is within the region of several Special Areas of Conservation, Special Protection Areas and RAMSAR sites as seen in Figure 4.3. The Neighbourhood Plan Area is not within 10 kilometres of any of these sites.

A Habitats Regulations Assessment was undertaken which determined that the Neighbourhood Plan is not likely to have a significant effect on any European designated sites.

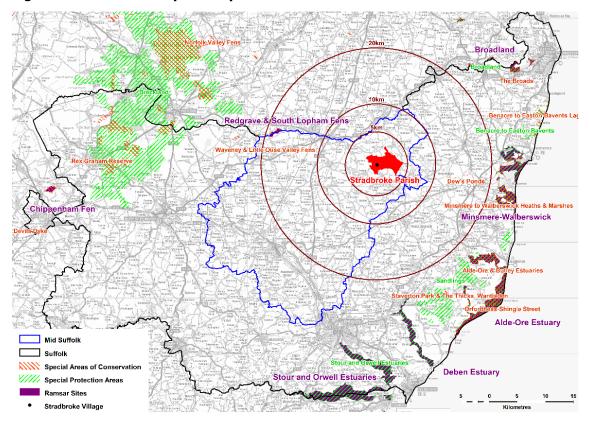


Figure 4.3: Sites of European Importance

Landscape

- 4.9 Stradbroke is a predominantly rural parish. The Joint Babergh and Mid Suffolk District Council Landscape Guidance² identifies that the Neighbourhood Plan Area is on Plateau Claylands. This features very heavy clay soil, is very gently undulating or flat and is dissected by small streams. The overall appearance is of wide open views with small clusters of hedges, trees and houses.
- 4.10 The principle aims for the Plateau Claylands are to:
 - maintain the distinctive settlement patterns, ensuring the sense of separation between settlements is maintained.
 - retain the rural character of the small settlements and conservation areas by avoiding the use of standardised and intrusive urban materials and features.
 - restore, maintain and enhance green and woodland areas.
 - design hedging for boundaries to reflect the local planting scheme to reduce visual impact on the distinctive character of the area.
 - maintain the character and condition of the landscape by requiring any major developments to enter into a Section 106 Legal Agreement for on- and off-site landscaping including enhancing field boundaries with local hedging and tree species.

² Babergh & Mid Suffolk District Councils (2015) *Joint Babergh and Mid Suffolk District Council Landscape Guidance*

Air and Climate

- 4.11 Mid Suffolk District Council does not currently require continuous monitoring of air quality and the District has no designated Air Quality Management Areas (AQMAs)³.
- 4.12 The only pollutant to be regularly monitored is nitrogen dioxide, which is monitored at 131 High Street, Needham Market as well as several points on the A14⁴ which exceed the WHO guideline of 40 micrograms per cubic metre (ug/m³). These are well outside the Neighbourhood Plan Area therefore are unlikely to be significant.
- 4.13 As the global climate changes, an increasing prevalence of high-intensity weather events is expected to affect the environment of Suffolk, particularly as the county is in the driest area of the UK with 30% of its land below sea level. 2015 was both the hottest and wettest year on record with most of this rainfall recorded in December of that year⁵.

Water

- 4.14 The Neighbourhood Plan Area is approximately six kilometres south of the River Waveney which forms much of the boundary between Norfolk and Suffolk. Several tributaries run through the Neighbourhood Plan Area, with two of these tributaries each lying approximately one mile from Stradbroke village on its north-east and west sides.
- 4.15 The areas immediately surrounding the tributaries to the west and north-east of the Neighbourhood Plan Area comprise flood risk zones 2 and 3 as seen in Figure 4.4. In addition, these areas are at risk of surface water flooding from both 1-in-30 year and 1-in-100 year events as seen in Figure 4.5.

³ Defra(2017) Air Quality Management Areas https://uk-air.defra.gov.uk/aqma/

⁴ Babergh and Mid Suffolk District Councils, 2016 Air Quality Annual Status Report (ASR) (http://www.midsuffolk.gov.uk/assets/Environment/2016-Annual-Status-Report.pdf)

⁵ http://www.greensuffolk.org/assets/Greenest-County/SCCP/Climate-Change/Suffolk-Climate-Action-Plan-3.pdf

Neighbourhood Plan Boundary
Flood Risk Level 3
Flood Risk Level 2

Figure 4.4: Fluvial flood risk

Source: Environment Agency

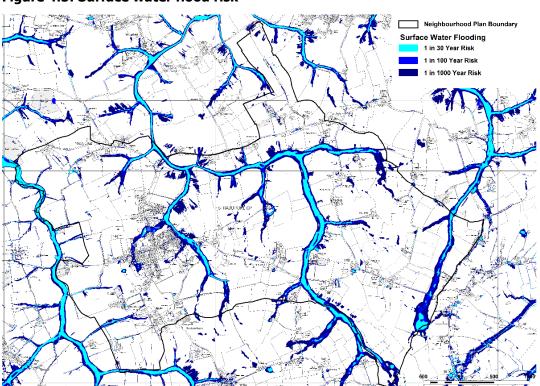


Figure 4.5: Surface water flood risk

Source: Environment Agency

- 4.16 Surface water flooding has the potential to affect or be exacerbated by development, particularly where the tributary at the eastern and north-eastern areas of the main settlement runs adjacent to three sites proposed for allocation:
 - Mill Lane (Policy STRAD18)
 - Grove Farm (Policy STRAD19; planning permission granted)
 - New Street (Policy STRAD15)
- 4.17 As shown in Figure 4.6, a small part of the Neighbourhood Plan Area contains a Groundwater Source Protection Zone. These zones show the risk of contamination from any activities that might cause pollution in the area. The risk of pollution is greater the closer the activity.

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Figure 4.6: Groundwater source protection zone

Source: Environment Agency (red = inner zone, green = outer zone, purple = total catchment zone)

4.18 The whole of Stradbroke parish is a Nitrate Vulnerable Zone (NVZ) for surface waters.

Soil and Geology

4.19 The Agricultural Land Classification (ALC) provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. Published by Natural England⁶, the ALC provides a classicisation in 5 grades using a number of criteria including climate (temperature, rainfall, aspect, exposure, frost risk), site (gradient, micro-relief, flood risk) and soil (depth, structure, texture, chemicals, stoniness). The scales ranges from 1 (high quality) to 5 – poorest.

⁶ http://publications.naturalengland.org.uk/file/4424325

- 4.20 The NPPF (paragraph 112) states that relevant planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of higher quality.
- 4.21 Stradbroke parish is located upon the High Suffolk Claylands. It is predominantly Grade 3 agricultural land (although it has not been possible to determine whether this is Grade 3a or Grade 3b), with a narrow belt of Grade 2 agricultural land in the north of the Neighbourhood Plan Area, away from the main settlement. This is show in Figure 4.7.

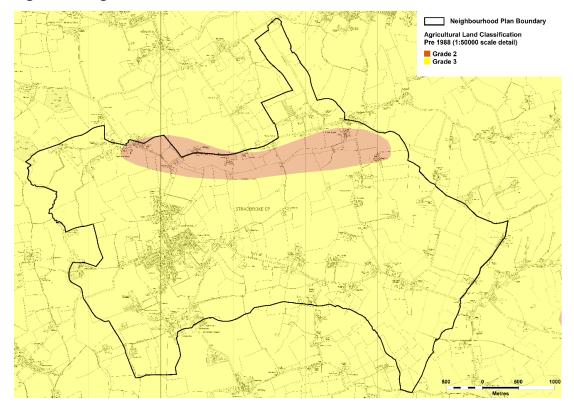


Figure 4.7: Agricultural Land Classification

Source: MAGIC, DEFRA

- 4.22 This shows that the majority of agricultural land in the parish is Grade 3 (good to moderate), with some areas Grade 2 (very good).
- 4.23 There is no existing or historic landfill in or close to the area and no mining activity.

Historic Environment

- 4.24 The historic environment of Stradbroke is considered to be of significant importance to the character of the village.
- 4.25 The Neighbourhood Plan Area has 69 listed buildings or structures, as shown at the parish level in Figure 4.8 and within the village in Figure 4.9. The split of these buildings is as follows:
 - Grade I − 0
 - Grade II 66
 - Grade II* − 3

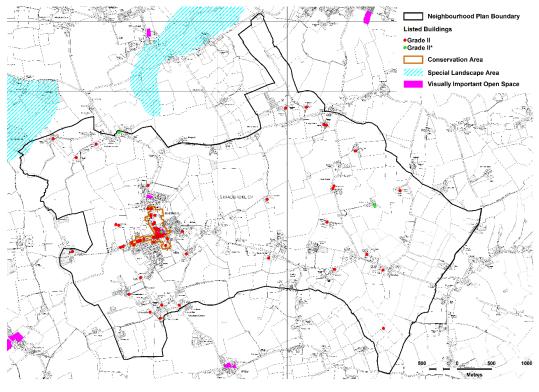


Figure 4.8: Listed buildings in the parish

Source: Historic England

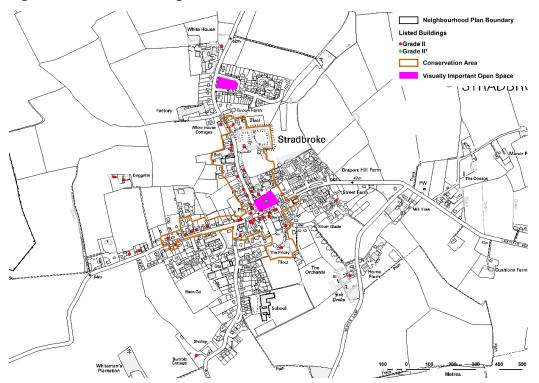


Figure 4.9: Listed buildings in Stradbroke

Source: Historic England

- 4.26 None of these buildings are on the register of Buildings at Risk. The three Grade II* structures are the Parish of Stradbroke Church on the corner of Queen Street and Church Street; Broad End Farmhouse on Stradbroke Road; and Hill House Farmhouse on the B1118 in Battlesea Green. A small number of listed buildings are near the Neighbourhood Plan Area boundary.
- 4.27 The central 'crossroads' area of Stradbroke village is covered by a Conservation Area as shown in Figure 4.9 which seeks to protect its medieval character. The Conservation Area Appraisal (CAA) notes that the most valued listed building in the Conservation Area is the church, graded II*. The predominant materials are rendered timber frames (for buildings) with black glazed pantile roofs.
- 4.28 The CAA also notes that:

"Local soft red brick can be found in the village, and many 19th Century buildings with slate roofs are of red brick construction but fronted with whites for effect. Many of these 19th Century buildings are not listed but contribute to Stradbroke's character and if identified could form the basis of a Local List."

- 4.29 There is no Local List in existence at the present time.
- 4.30 As shown in Figure 4.10, there are 53 monuments in the Neighbourhood Plan Area on the Historic Environmental Record (HER). Stradbroke village contains a large proportion of these monuments and they play an important role in the historic character of the village.

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Figure 4.10: HER monuments

Source: Suffolk County Council Archaeological Service

4.31 Several HER monuments are near Grove Farm, allocated itself in an outline record (SBK 049), Stradbroke Hall (SBK003), findspot of a 16th century jetton in the Hall (SBK 047); a medieval findspot near Drapers Hill Farm (MSF 18332); and a medieval moat (SBK004) and monument (SBK 021- MSF 1966) near the site allocated at STRAD16.

Social and economic indicators

- 4.32 The 2011 Census recorded that the population of Stradbroke parish was 1,408 persons, living in 622 households. Since 2001, the population has grown by 187 persons, or 15.3%. Comparatively, the Mid Suffolk district population grew by 11.4%. Over the same period, the number of households grew by 117 in Stradbroke (23.2%) and by 4,910 in Mid Suffolk district (13.9%) This number will reflect the number of new houses built over the decade and also possibly the sub-division of existing properties into multiple households.
- 4.33 There has been a broad trend in the increase in population and number of households across the wider district but the rate of increase appears to be notably higher in Stradbroke.
- 4.34 Slow development growth has caused a lack of supply in the settlement, causing an upward pressure on house prices and rents. In October 2017, the average price of a terraced house in the IP21 postcode area (covering Stradbroke) was £170,625⁷. Based on a 95% mortgage, a couple would need a combined income of £54,700, or a single person an income of £46,300, to be able to buy such a property.
- 4.35 Table 4.2 shows the general health of the population. This shows that Stradbroke has health levels broadly similar to Mid Suffolk district and to the national average.

Table 4.2: General health, 2011

	Stradbroke parish	Mid Suffolk District	England
Very good health	45%	49%	46%
Good health	34%	35%	35%
Fair health	16%	13%	14%
Bad health	4%	3%	4%
Very bad health	1%	1%	1%

Source: 2011 Census

Roads and transport

- 4.36 Stradbroke has a distinct staggered crossroads pattern. All roads in and out of the village go through the village centre. All of these roads are two-lane routes (i.e. one lane in each direction) and are therefore inappropriate for carrying significant volumes of traffic. Queen Street is the main route from the area towards Hoxne, Diss and onward to Norwich and Bury St Edmunds.
- 4.37 The roads in the centre of the town reflect its history and are often very small and therefore inappropriate for carrying anything other than a very low level of local traffic.
- 4.38 There is a pinch point on the road near the Primary School which regularly leads to traffic issues, particularly at school drop-off and pick-up times. The opening of an anaerobic bio digester unit to the east of the village has created a significant increase in large agricultural vehicles travelling on this road which has increased the frequency of traffic gridlock outside of school times.
- 4.39 Stradbroke is not served by a train station. Public transport to a number of locations is poor, including Diss, Eye, Ipswich and Bury St Edmunds.

Infrastructure

4.40 Stradbroke has the following community infrastructure assets focused in Stradbroke village:

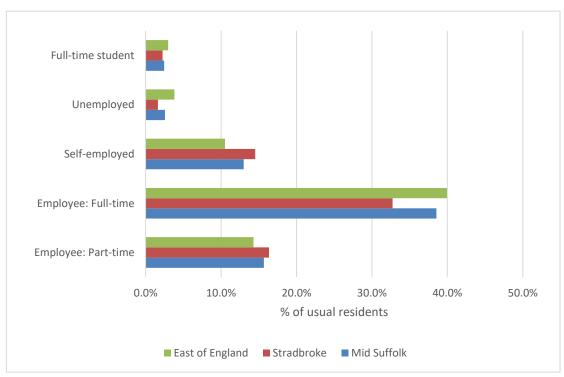
⁷ Source: www.home.co.uk

- · A primary school
- A high school
- A GP surgery (shared with Fressingfield)
- Several places of worship
- Several recreational spaces used for formal and informal recreation, including playing fields
- A number of pubs and restaurants
- A range of shops
- Gardens and allotments

Economic characteristics

- 4.41 Stradbroke's levels of economic activity are below the district and regional figures, but with slightly lower unemployment. This reflects the high proportion of retirees. It also has a comparatively strong level of self-employed people without employees, suggesting a notable presence of small business.
- 4.42 This is shown in Figure 4.11.

Figure 4.11: Economic activity, 2011



Source: 2011 Census

4.43 Stradbroke has historically been a working agricultural village and is comparatively strongly represented in the agriculture & forestry sector. Today it is also well represented by a variety of sectors including retail, construction, manufacturing, and education. This is shown in Figure 4.12. Stradbroke has traditionally been a working agricultural village, but today also provides employment in services in retail.

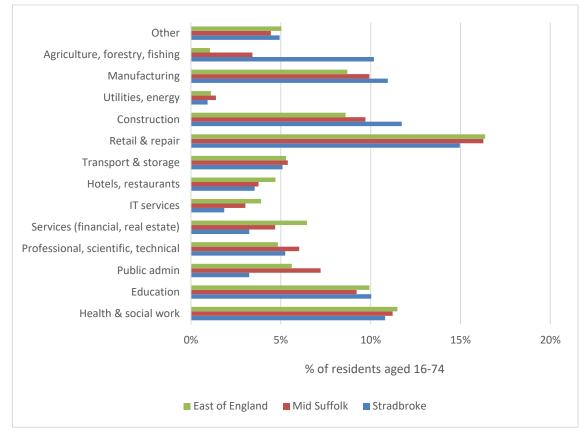


Figure 4.12: Type of industry, 2011

Source: 2011 Census

4.44 Figure 4.13 shows that Stradbroke has nearly 30% of the population have no qualifications, significantly higher than Mid Suffolk and the East and demonstrated in the higher levels of part-time employment. The proportion that have been educated to Level 4 is slightly lower than the district and region, but still significant at nearly 23%.

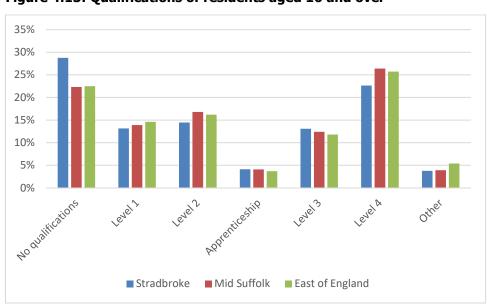


Figure 4.13: Qualifications of residents aged 16 and over

Source: 2011 Census

5 KEY SUSTAINABILITY ISSUES

SWOT analysis

5.1 Table 5.1 has been informed by the issues identified in the Neighbourhood Plan engagement events and consultation, and the baseline information collected in Section 3.

Table 5.1: SWOT analysis of issues facing Stradbroke parish

Strengths

- Significant heritage of the village (including the conservation area)
- Centrally located to nearby villages and towns
- Wide variety of community facilities (sport, allotments, leisure facilities)
- Varied community infrastructure (prethrough secondary schools, doctor's surgery, fire station, library, postoffice)
- Rich agricultural landscape

Weaknesses

- A significant distance from A12 and nearest railway station
- Very limited bus services
- Staggered crossroads shape creates traffic pinch points
- Employment opportunities limited
- Infrastructure struggling to cope with present population needs
- Single convenience retail shop vulnerable to closure
- Difficulty for young people to access further education

Opportunities

- To extend the service role provided for adjacent villages
- To provide a fit-for-purpose preschool and expand parking for primary school
- To expand facilities for high school
- To expand community playing fields
- To increase the scale and range of employment
- To enhance community cohesion
- To alleviate traffic pressures at peak times and establish and protect cycleand pedestrian pathways through the village

Threats

- Population profile is skewed towards retired and elderly
- Levels of service provision and infrastructure under severe pressure to cope with growing population demands
- Sensitive settings, particularly at the edges of the village
- Dominance of road transport causing problems of parking, volume and speed causing safety issues for pedestrians, cyclists and users of mobility scooters

Key issues

- 5.2 There are a number of sustainability issues and challenges facing the parish. While Stradbroke parish is a key a high quality environment to residents and local businesses, the Neighbourhood Plan will need to manage and seek to resolve a series of issues over its lifetime if the parish is to continue to be successful while respecting its historic character and landscape setting.
- 5.3 In the absence of a Neighbourhood Plan (and as a consequence a lack of vision and strategy for Stradbroke), there will be fewer opportunities to address the issues and challenges facing the parish, as well as contributing to a reduction in the potential benefit to the community.

Table 5.2: Challenges and impacts of not having a neighbourhood plan

Challenges facing Stradbroke Parish	Effect of not having a neighbourhood plan				
Problem of traffic speed, volume and weight and lack of pedestrian/cyclist safety at the village centre junctions	Residents lives will be further blighted and safety will be worsened by traffic movements				
Scale of housing growth	Local Plan policies are strategic in nature but do require growth of Core Villages, therefore Stradbroke could be exposed to speculative applications for major housing				
Lack of affordable housing for parish residents	No suitable sites for housing for local people would be delivered				
Supporting an ageing population	Potential issues of care/support/transport and a lack of local homes suitable for the needs of older people				
Inadequate and potentially reducing public transport options	Increased dependence on the private car and increasing isolation for those unable to afford a car				
Support and flexibility for local businesses	The needs of businesses to grow and change may be restricted by current policies				
Infrastructure improvements such as roads, crossings, parking, community facilities	Funding for infrastructure requirements may not arise and provision of community facilities may not keep up with growing demand				
Pressures for development in countryside	Local Plan policies are strategic in nature but do require growth of Core Villages which could therefore be ad-hoc and unplanned				
Loss of agricultural land to development	Could result in unnecessary loss of agricultural land due to unplanned development coming forward through speculative applications				
Need to maintain and enhance the high quality natural environment, wildlife networks and biodiversity of the parish	Could result in unnecessary impacts on biodiversity due to unplanned development coming forward through speculative applications				
Need to protect and enhance the historic buildings and environment of the parish	Could result in unnecessary impacts on heritage assets due to unplanned development coming forward through speculative applications				

6 OBJECTIVES OF THE SUSTAINABILITY APPRAISAL

- 6.1 The issues for the Neighbourhood Plan and the objectives for the Sustainability Appraisal, have been informed by the policy documents identified in section 2, in particular:
 - the emerging Babergh and Mid Suffolk Local Plan
 - the results of the resident and business surveys and engagement events conducted between 2015 and 2017.
 - the baseline information collected in section 4 and the sustainability challenges for Stradbroke parish identified in section 5.
- 6.2 The Objectives, and the Indicators used to measure them, are collectively known as the Sustainability Framework.
- 6.3 The Sustainability Appraisal measures the sustainability of the Neighbourhood Plan through the identification of objectives and indicators. This has been used to predict the sustainability effects of the strategy for the Neighbourhood Plan, and the policies to deliver the strategy. The next section of this report considers each emerging policy and a number of alternative options in order to determine the most sustainable option for each policy area. It also includes information about likely future changes that will occur even without a new Neighbourhood Plan. These alternative options are assessed against the Sustainability Framework in order to determine which option is the most sustainable. This will be used to inform the drafting of the Neighbourhood Plan in order to make sure it is the most sustainable plan possible, given all realistic alternatives.
- 6.4 The Sustainability Appraisal assesses each of the proposed Neighbourhood Plan policies against the 9 Sustainability Objectives, which are in effect a measure of sustainability. Each policy is tested by making an assessment of the likely impact on a number of measurable 'indicators'. This will help to judge the performance of the policy against each of the sustainability objectives. It is proposed that the performance of the policies in the Neighbourhood Plan will be measured against the objectives in terms of positive, neutral or negative impact.

7 SUSTAINABILITY APPRAISAL FRAMEWORK (STAGE A4)

- 7.1 In order to undertake the Sustainability Appraisal process for the Neighbourhood Plan, a total of 9 sustainability objectives have been identified to enable an assessment to be made of the emerging options and allow for recommendations and mitigation measures to be proposed.
- 7.2 The sustainability objectives have emerged through the following considerations:
 - through the review of documents listed in Appendix B
 - as identified in the Baseline section
 - to help address sustainability issues known locally
 - to help address the 'weaknesses' and mitigate the 'threats' outlined in the SWOT analysis.
- 7.3 The sustainability objectives and indicators are shown in Table 7.1 below:

Table 7.1: Sustainability objectives and criteria for the Stradbroke Neighbourhood Plan

Sustainability	Objectives	Criteria
theme		
1/Env	To preserve and enhance the natural beauty of Stradbroke in terms of its geology, landform, soils, biodiversity, water systems and climate	 Change in area of priority habitats within the parish (data from Suffolk Biological Records Office) Amount of agricultural land classification (ALC) land lost. Number of developments in 'highly vulnerable' or 'more vulnerable' flood risk areas.
2/Soc	To ensure that housing addresses the needs of the existing community of Stradbroke before addressing wider needs	Mix of housing built by dwelling size.Number of affordable homes completed.
3/Econ	To maximise the potential of existing employment/employers and support the need for new employment opportunities.	 Number of existing businesses retained. Number of new businesses in the parish. Number of new jobs likely to be created. Number of businesses and dwellings (for home workers) with access to superfast broadband.
4/Econ	To protect and enhance the vitality of the retail provision within the village	- Number of shop units in the village
5/Env	To protect the identity and local distinctiveness of Stradbroke by conserving and enhancing the historic environment, heritage assets and their settings	 Number of listed buildings lost in built-up area. Number of developments within or adjacent to a Conservation Area. Number of trees with TPOs.
6/Soc	To ensure that the community has a high quality and healthy lifestyle.	 Census figures on long term illness and general health. Number/area of green spaces within walking distance of homes. Usage of formal green spaces

Sustainability theme	Objectives	Criteria
		within the parish. - Number of formal recreation facilities within walking distance of homes. - Number of homes experiencing unacceptable levels of noise.
7/Soc	To ensure the provision of a range of community facilities that provide for the needs of the community	- Number of community facilities within the parish.
8/Soc	To improve safe and sustainable movement around the parish and to the village by a range of modes	 Levels of traffic at key junctions in the village centre. Number and distance of new footpaths/cyclepaths. Speed data from police. Accident data from police. Number of safe crossing points serving the village centre.
9/Soc	To ensure that the community has adequate access to the key services it needs, including health facilities, convenience shops, and schools	Distance the population of the parish live from key services.Availability of regular public transport.Speed of broadband services.

8 ASSESSMENT OF NEIGHBOURHOOD PLAN POLICIES

- 8.1 As the Neighbourhood Plan has developed, the strategy and policies have been tested against these sustainability objectives, to identify appropriate policies for inclusion in the Plan.
- 8.2 Realistic policy options have been appraised against the Sustainability Objectives in order to ensure that the policies chosen for the Neighbourhood Plan are sustainable.
- 8.3 The following symbols have been used to record the impact of each option against each objective:

++	Significant positive impact on sustainability objective
+	Positive impact on sustainability objective
+?	Possible positive impact or slight positive impact on sustainability objective
0	No impact or neutral impact on sustainability objective
-?	Possible negative impact or slight negative impact on sustainability objective
-	Negative impact on sustainability objective
	Significant negative impact on sustainability objective

In the tables below, 'CSFR' means 'Mid Suffolk Core Strategy Focussed Review 2012', 'CS' means Mid Suffolk Core Strategy 2008', 'LPFA' means 'Local Plan First Alteration 2006' and 'LP' means 'Mid Suffolk Local Plan 1998'.

Policy STRAD1 – Development Strategy and Principles

Policy Options:

Option A: To have an NP policy that identifies a strategy to direct where development should be located in order to be sustainable

Option B: To have no NP policy, covered by CSFR Policy FC2; CS Policy CS2; LP Policies SB2,

GP1, H3, H13, H15

Policy Options	1/Env — Cside/ Biodiversity	2/Soc - Housing	3/Econ - Commercial	4/Econ - Retail	5/Env - Heritage	6/Soc - Health	7/Soc - Community	8/Soc - Transport & Movement	10/Soc - Services
Α	+?	+	+?	0	-?	+	+	+	+
В	+?	+?	+?	0	+?	+?	+?	+?	+?

Preferred Policy Option:

Summary and conclusion:

Whilst option A could have a negative impact if development is located close to the Conservation Area in the village, it is likely to have a positive impact on housing, health, community, transport and movement and services, compared with option B which may have a possible positive impact.

Assessment of Neighbourhood Plan policy options

Policy STRAD2 – Design principles

Policy Options:

Option A: To have an NP policy that establishes clear design principles for development. Option B: To have no NP policy, covered by CS Policies CS5, CS9; LP Policies SB2, GP1, H13,

H15, H16, E12, RT4

Policy Options	1/Env — Cside/ Biodiversity	2/Soc - Housing	3/Econ - Commercial	4/Econ - Retail	5/Env - Heritage	6/Soc - Health	7/Soc - Community	8/Soc - Transport & Movement	10/Soc - Services	
Α	+	0	0	0	+?	+?	0	0	0	
В	+?	0	0	0	+?	+?	0	0	0	
Prefe	Preferred Policy									

Summary and conclusion:

Option:

Option A has positive impacts on three of the criteria and is likely to be slightly more positive than option B in respect of the impact on the countryside, reflecting the policy references to landscaping and a landscape buffer.

A

Policy STRAD3 – Housing mix

Policy Options:

Option A: To have an NP policy that identifies clear requirements for particular housing types Option B: To have no NP policy, covered by CS Policy CS9; LP Policy H14

Policy Options	1/Env — Cside/ Biodiversity	2/Soc - Housing	3/Econ - Commercial	4/Econ - Retail	5/Env - Heritage	6/Soc - Health	7/Soc - Community	8/Soc – Transport & Movement	10/Soc - Services
Α	0	++	0	0	0	0	0	0	0
В	0	+?	0	0	0	0	0	0	0

Preferred Policy Option:

| '

Summary and conclusion:

Option A is expected to have significant positive impacts because of the specific requirement in the policy to deliver smaller housing. Option B may only have possible positive impacts because the requirements are only for a mix of housing.

Assessment of Neighbourhood Plan policy options

Policy STRAD4 – Utilities provision

Policy Options:

Option A: To have an NP policy that seeks to ensure that utilities provision is as efficient as possible.

Option B: To have no NP policy, covered by CSFR Policy FC1.1; CS Policies CS3, CS4, CS6; LP Policy SC3

Policy Options	1/Env — Cside/ Biodiversity	2/Soc - Housing	3/Econ - Commercial	4/Econ - Retail	5/Env - Heritage	6/Soc - Health	7/Soc - Community	8/Soc – Transport & Movement	10/Soc - Services
Α	+	0	0	0	0	0	0	0	0
, ·									
В	+?	0	0	0	0	0	0	0	0

Preferred Policy Option:

A

Summary and conclusion:

Option A is expected to have positive impacts because it identifies and provides a framework for addressing specific issues relating to water, electricity and renewable energy whereas Option B may only have possible positive impacts because the policy framework is broader.

Policy STRAD5 - Flood mitigation

Policy Options:

Option A: To have an NP policy that seeks to ensure that flood mitigation adopts the most efficient strategy as possible

Option B: To have no NP policy, covered by CSFR Policy FC1.1; CS Policies CS3, CS4

Policy Options	1/Env - Cside/ Biodiversity	2/Soc - Housing	3/Econ - Commercial	4/Econ - Retail	5/Env - Heritage	6/Soc - Health	7/Soc - Community	8/Soc - Transport & Movement	10/Soc - Services
Α	+	0	0	0	0	0	0	0	0
В	+?	0	0	0	0	0	0	0	0

Preferred Policy Option:

A

Summary and conclusion:

Option A is expected to have positive impacts because it identifies and provides a framework for addressing specific flood mitigation issues whereas Option B may only have possible positive impacts because the policy framework is broader.

Assessment of Neighbourhood Plan policy options

Policy STRAD6 – Education and health infrastructure

Policy Options:

Option A: To have a policy that provides clear support for the provision of new education and health infrastructure along with principles relating to location and accessibility.

Option B: To have no NP policy, covered by CS Policy CS6; LP Policies, T10, SC8, SC10

Policy Options	1/Env — Cside/ Biodiversity	2/Soc - Housing	3/Econ - Commercial	4/Econ - Retail	5/Env - Heritage	6/Soc - Health	7/Soc - Community	8/Soc – Transport & Movement	10/Soc - Services
Α	0	0	0	0	0	+?	+?	0	+?
В	0	0	0	0	0	0	0	0	0
Prefe	rred Polic	у	Α.						

Option:

Summary and conclusion:

Option B is only likely to have a neutral effect and this could even become negative if the existing health and education capacity is insufficient to address needs. Option A could have positive impacts on health, community and services; this is only a possible positive impact because specific locations for new provision are not identified.

Policy STRAD7 – Community infrastructure

Policy Options:

Option A: To have a policy that protects the provision of community facilities and actively encourages new provision, with a specific location identified.

Option B: To have no NP policy, covered by CS Policy CS6; LP Policies SB3, RT1-RT5

Policy Options	1/Env – Cside/ Biodiversity	2/Soc - Housing	3/Econ - Commercial	4/Econ - Retail	5/Env - Heritage	6/Soc - Health	7/Soc - Community	8/Soc – Transport & Movement	10/Soc - Services
Α	0	0	0	0	0	+	+	0	+
В	0	0	0	0	0	+?	+?	0	+?

Preferred Policy Option:

Summary and conclusion:

Both options could have positive impacts for health, community and service provision. However, Option A is more likely to have positive impacts because it requires provision to be in or adjacent to the village and it specifically identifies the expansion of the Community Playing Fields, a key community asset for health and activity.

Assessment of Neighbourhood Plan policy options

Policy STRAD8 – Highway access and pedestrian movement

A

Α

Policy Options:

Option A: To have a policy which identifies, protects and encourages investment in particular routes for walking and cycling

Option B: To have no NP policy, covered by CS Policy CS6; LP Policies GP1, T10, T11

Policy Options	1/Env — Cside/ Biodiversity	2/Soc - Housing	3/Econ - Commercial	4/Econ - Retail	5/Env - Heritage	6/Soc - Health	7/Soc - Community	8/Soc - Transport & Movement	10/Soc - Services
Α	0	0	0	0	0	+	0	++	+
В	0	0	0	0	0	+?	0	+?	+?

Preferred Policy Option:

Summary and conclusion:

Option A is expected to have positive effects in terms of health and access to services and significant positive effects for movement around the village. Option B is less specific in where improvements should be made so may only possibly have positive effects.

Policy STRAD9 – New estate roads

Policy Options:

Option A: To have a policy that requires development of estate roads so that they do not create issues for access to the drainage network

Option B: To have no NP policy, covered by CS Policy CS6

Policy Options	1/Env - Cside/ Biodiversity	2/Soc - Housing	3/Econ - Commercial	4/Econ - Retail	5/Env - Heritage	6/Soc - Health	7/Soc - Community	8/Soc - Transport & Movement	10/Soc - Services
Α	0	0	0	0	0	0	0	0	0
В	0	0	0	0	0	0	0	0	0

Preferred Policy Option:

A/B

Summary and conclusion:

Neither option is expected to have an impact on any of the sustainability objectives.

Assessment of Neighbourhood Plan policy options

Policy STRAD10 - Parking provision

Policy Options:

Option A: To have a policy which explicitly requires parking standards to be met and seeks to maintain existing on-street parking provision.

Option B: To have no NP policy, covered by LP Policies GP1, T9

Policy Options	1/Env — Cside/ Biodiversity	2/Soc - Housing	3/Econ - Commercial	4/Econ - Retail	5/Env - Heritage	6/Soc - Health	7/Soc - Community	8/Soc – Transport & Movement	10/Soc - Services
Α	0	0	0	0	0	0	0	+	0
В	0	0	0	0	0	0	0	+?	0

Preferred Policy Option:

A

Summary and conclusion:

Option A is likely to have positive effects on transport and movement because it reflects the needs of pedestrians and cyclists as well as requiring modern parking solutions. Option B may only have possible positive effects because the policy framework is broader

Policy STRAD11 - Local Green Spaces

Policy Options:

Option A: To have a policy that protects spaces of importance to the local community Option B: To have no NP policy, covered by CS Policy CS5; LP Policies SB3, RT3

Policy Options	1/Env — Cside/ Biodiversity	2/Soc - Housing	3/Econ - Commercial	4/Econ - Retail	5/Env - Heritage	6/Soc - Health	7/Soc - Community	8/Soc – Transport & Movement	10/Soc - Services
Α	++	0	0	0	0	+	+	0	0
В	+?	0	0	0	0	0	0	0	0

Preferred Policy Option:

Α

Summary and conclusion:

Option A identifies a number of specific local green spaces for protection, so is likely to have significant positive effects on the environment. Because several of these are recreation sites, this will have a positive effect on health and community. Option B does not provide a specific framework for protecting such sites therefore is will could possibly have positive effects on the environment.

Assessment of Neighbourhood Plan policy options

Policy STRAD12 – Historic environment and design

Policy Options:

Option A: To have a policy which identifies the type of design and heritage features and materials will have a positive impact on the character of the village and its conservation area. Option B: To have no NP policy, covered by CS Policy CS5; LP Policies SB2, HB1, HB8, GP1, H13, H15, E12

Policy Options	1/Env — Cside/ Biodiversity	2/Soc - Housing	3/Econ - Commercial	4/Econ - Retail	5/Env - Heritage	6/Soc - Health	7/Soc - Community	8/Soc – Transport & Movement	10/Soc - Services
Α	0	0	0	0	++	0	0	0	0
В	0	0	0	0	+?	0	0	0	0

Preferred Policy Option:

A

Summary and conclusion:

The locally specific policy framework provided by the NP policy means that Option A is likely to have a significant positive impact on heritage whereas Option B may only possibly have a positive impact, reflecting its broader framework.

Policy STRAD13 - Light pollution

Policy Options:

Option A: To have a policy which seeks to mitigate a specific problem with development in a 'visible' rural village such as Stradbroke

Option B: To have no NP policy, covered by CS Policy CS4

Policy Options	1/Env — Cside/ Biodiversity	2/Soc - Housing	3/Econ - Commercial	4/Econ - Retail	5/Env - Heritage	6/Soc - Health	7/Soc - Community	8/Soc-Transport & Movement	10/Soc - Services
Α	+	0	0	0	0	0	0	0	0
В	-?	0	0	0	0	0	0	0	0

Preferred Policy Option:

A

Summary and conclusion:

Option A is likely to have a positive effect on the countryside and setting of Stradbroke. Under Option B there is no policy framework for explicitly addressing light pollution so, given the levels of development proposed, there could possibly be a negative effect.

Policy STRAD14 – Employment provision

Policy Options:

Option A: To have a policy which encourages employment provision, including on the edge of the settlement, whilst providing a framework to ensure that such growth properly mitigates any likely impacts.

Option B: To have no NP policy, covered by CSFR Policy FC3; CS Policies CS2, CS6; LP Policies GP1, E4, E8, E9, E10, E12, H16

Option C: Allocate one or more sites to deliver specific employment needs⁸.

Policy Options	1/Env — Cside/ Biodiversity	2/Soc - Housing	3/Econ - Commercial	4/Econ - Retail	5/Env - Heritage	6/Soc - Health	7/Soc - Community	8/Soc – Transport & Movement	10/Soc - Services
Α	-?	0	+	0	0	0	0	0	0
В	+?	0	+?	0	0	0	0	0	0
С	-?	0	+	0	0	0	0	-?	0

Preferred Policy Option:

Α

Summary and conclusion:

Options A and B could possibly have negative impacts on the environment if commercial development encroaches into the countryside but is likely to have positive impacts in terms of commercial activity and jobs. Option B may possibly have positive impacts on these two sustainability objectives but the broader framework makes the positive impacts less certain than for Option A. Option C could result in the development of a site for commercial activity which attracts further HGV movements through Stradbroke village, conflicting with the objective of encouraging increased pedestrian and cycle movements.

⁸ The Call for Sites process identified only one site where the owner was potentially interested in the site coming forward for commercial development (site 13 on Figure 8.1). In the site assessment work (AECOM, 2017, Stradbroke Neighbourhood Plan Site Assessment) this was considered to represent a sustainable option for development which could have been taken forward, in principle, for certain types of commercial development.

Asse	Assessment of Neighbourhood Plan policy options										
Policy STRAD15 – Retail provision											
Policy Options: Option A: To have a policy specifically encouraging the retention and expansion of retail provision to serve the needs of the community Option B: To have no NP policy, covered by CS Policies CS2, CS6; LP Policies GP1, S7, S10, H16											
Policy Options	SS T SS										
A -? 0 +? + 0 0 0 0											
B +? 0 0 +? 0 0 0 0 0											
Preferred Policy A											

Summary and conclusion:

Option A could possibly have negative impacts on the environment if retail development encroaches into the countryside but is likely to have positive impacts in terms of addressing retail needs and jobs. Option B may possibly have positive impacts on the countryside and retail provision but the broader framework makes the positive impacts less certain than for Option A.

Housing needs and site allocations

- 8.5 The process of site allocation included consideration of the scale of housing required to contribute towards addressing Mid Suffolk district's objectively assessed need.
- 8.6 The Babergh and Mid Suffolk emerging Joint Local Plan is required to provide for significant levels of housing growth in order to address the identified needs of the two districts over the plan period to 2036. Whilst the spatial distribution of this growth will be determined through the development of the Joint Local Plan, Stradbroke's status as a core village means that it will play a key role in addressing that need. The option of not allocating sites for development would therefore create substantial uncertainty over the ability of the village to contribute towards addressing these needs. The table below also summarises the adverse impacts this could have on the ability to address the objectives of the Neighbourhood Plan through a number of site allocations.

Assessment of Neighbourhood Plan policy options											
Addressing housing needs											
Polic	y Option:	: To not all	ocate sites	for housir	ng develop	ment					
Policy Options	1/Env — Cside/ Biodiversity	2/Soc - Housing	3/Econ - Commercial	4/Econ - Retail	5/Env - Heritage	6/Soc - Health	7/Soc - Community	8/Soc – Transport & Movement	10/Soc - Services		
Α	-?	-	0	0	-?	0	-?	-?	-?		

Summary and conclusion:

The option would have a negative impact on the ability to address housing needs. The lack of certainty over the location of development would also mean a possible negative impact on the countryside and heritage. In addition, the lack of allocations would create uncertainty over the ability to secure contributions from development to provide the necessary infrastructure that addresses the objectives relating to community, transport (cycling and walking) and services.

- 8.7 The consultation in October and November 2017 on the Regulation 18 draft of the Babergh and Mid Suffolk emerging Joint Local Plan was based on the 2016 Strategic Housing Market Assessment (SHMA) assessment. This gave an objectively assessed need (OAN) figure for Mid Suffolk of 452 dwellings per annum over the period 2014-2036, or a total of 9,951 dwellings. As at 1st April 2017, the residual requirement stood at 5,820 dwellings to 2036, or 306 dwellings per annum. The Regulation 18 draft Joint Local Plan recognised that the OAN is the starting point for establishing housing requirements in a local plan. The only option consulted on in the Regulation 18 Plan was to set the requirement at the OAN level (452 dpa) as there was no evidence to suggest that the housing requirement should be set at any other figure.
- 8.8 At the current time, a revised draft Local Plan has not been published. Moreover, in late-2017 the Government published its consultation on the use of a standardised methodology for calculating OAN which would have resulted in an OAN figure of 573 dpa for Mid Suffolk. At the present time it has not been confirmed whether this approach will be adopted by Government.
- 8.9 The Regulation 18 Joint Local Plan proposed that Stradbroke be a Core Village. Accordingly various spatial distributions were also considered, with Core Villages having to accommodate anything between 15% and 35% of the overall growth. However, this did not sub-divide these figures down to individual Core Villages themselves.
- 8.10 Given this, there is a lack of certainty over what represents an appropriate level of housing growth to plan for in the Stradbroke Neighbourhood Plan. The Neighbourhood Plan has considered the sustainability of different levels of growth. The approach has been twofold:
 - i. Consideration of the sites on their merits and the contribution they make towards achieving the objectives of the Neighbourhood Plan.
 - ii. Consideration of any fundamental constraints to growth.
- 8.11 One fundamental constraint was identified, namely primary school capacity. Based on Suffolk County Council's education needs modelling (and engagement with the County Council to confirm this), development in excess of 270 new homes would be very likely to trigger a requirement for a new primary school. The existing school site does not have the capacity to

- expand in its current location so a new school site would have to be found. This was considered to represent a fundamental constraint to growth in the Neighbourhood Plan because the delivery of a new school would be likely to require a strategic scale of growth which should be determined through the Local Plan process.
- 8.12 The focus of the site assessment work was therefore on the general sustainability of sites and their contribution to achieving the objectives of the Neighbourhood Plan.
- 8.13 In 2014, Mid Suffolk District Council (MSDC) undertook a district-wide 'Call for Sites'. This first call resulted in a draft Strategic Housing Land Availability Assessment (SHLAA) being published in May 2016. The Neighbourhood Plan Working Group issued its own Call for Sites in June 2015. The sites put forward by landowners to both MSDC and the Neighbourhood Plan were combined. In August 2017, as part of the Regulation 18 consultation on the draft Joint Local Plan, MSDC issued an updated Strategic Housing and Employment Land Availability Assessment (SHELAA). This document superseded all other documents issued by MSDC to that point. MSDC included six sites for Stradbroke in the Regulation 18 Joint Local Plan consultation process. The Neighbourhood Plan Working Group then combined all sites put forward to both MSDC and directly to the Neighbourhood Plan process. This produced a total of 13 sites. Since that time, a 14th site came forward and was considered. All the sites are shown in Figure 8.2.
- 8.14 These sites in combination could deliver substantially in excess of the figure of 270 dwellings which represents a constraint to growth because of the primary school issue. The location of the sites also demonstrates that there are very few locations adjacent to the settlement where land could possible come forward for development. The 14 sites are therefore considered to represent a reasonable range of alternatives for Stradbroke to contribute towards the district housing need and to address the objectives of the Neighbourhood Plan.
- 8.15 To inform the Neighbourhood Plan consideration of sites, AECOM was commissioned to undertake an assessment of the sites, their constraints and the opportunities they would provide to address particular issues⁹. This has been submitted as part of the evidence base at Submission (Regulation 16) stage. This Sustainability Appraisal uses the outputs from that study to inform the assessment below. Some sites were not assessed by AECOM because they had already been assessed through the Babergh and Mid Suffolk SHLAA process. They have therefore been assessed here using the evidence from the SHLAA where relevant.
- 8.16 Site 13 was proposed solely for employment, therefore was not included in this part of the SEA process. It is addressed under Policy STRAD14 (Employment provision).
- 8.17 It should be noted that Policy STRAD20 allocates land at Grove Farm for residential development. This reflects the fact that the site has the benefit of planning permission, granted in March 2016. For this reason, the site has not been assessed.

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⁹ AECOM (2017) Stradbroke Neighbourhood Plan Site Assessment

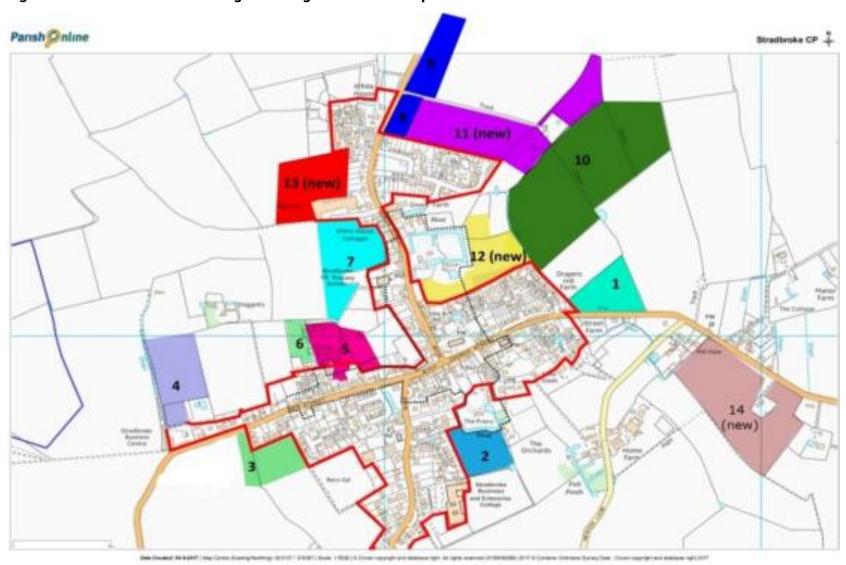


Figure 8.2: Sites considered through the Neighbourhood Plan process

Assessment of Neighbourhood Plan policy options

Site Allocation Policies -Housing Site Allocations

Policy Options:

To allocate any one or a combination of Site Options (1 to 14) to address the housing needs of Stradbroke and to contribute towards the wider housing needs of Mid

Suffolk district as one of the Core Villages.

Surrolk district a	15 0110	01 (11	C CO. C	, villa	gcs.									
Sustainability theme	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6	Site 7	Site 8	Site 9	Site 10	Site 11	Site 12	Site 14	Summary of appraisal
1/Env – Countryside/ Biodiversity	-?	0	-?		-?	-?	-?	-?	-		-	-?		All sites are greenfield and, with the exception of site 2, would have some visual impact on the countryside. Sites that are poorly located to the existing built up area would have a greater impact.
2/Soc – Housing	+	+	+	+	+	+	++	+	+	++	++	++	++	All sites would make a positive contribution to addressing housing needs by providing a range of housing, including affordable housing. Larger sites would be able to make a more significant contribution across dwelling types.
3/Econ – Commercial	0	0	0	+?	0	0	0	0	0	0	0	0	0	Only site 4 could potentially provide an extension to an existing employment area. No other sites would provide employment space.
4/Econ - Retail	0	0	0	0	0	0	0	0	0	0	0	0	0	None of the sites were proposed to provide new retail activity.
5/Env - Heritage	0	-?	0	0	0	0	-?	0	0	0	0	-?	0	Sites 2, 7 and 12 could have an impact on heritage assets and the setting of the Conservation Area, although these would be likely to be capable of mitigation. No other sites would have any impact.
6/Soc - Health	+	+	++	-?	+	+	+	+	0	-?	-?	+	-	Sites that are close to green spaces and promote walking are expected to have positive benefits (sites 1, 2, 5, 6, 7, 8 and 12). Site 3 is expected to have a significant positive benefit because it would provide an extension to the existing community playing fields. Sites 4, 10 and 11 are poorly located for access to green spaces and do not encourage walking because of poor access into the village, therefore are likely to have a negative impact. Site 14, because of its location further from the village would definitely have a negative impact.
7/Soc - Community	+	++	++	-?	0	0	++	0	0	-?	-?	+		Sites 2, 3 and 6 would provide facilities and open space of benefit to the wider community so would have a significant positive effect. Sites 1 and 12 are close to existing community facilities so would have a positive benefit by providing easy, sustainable access. Sites 4, 10 and 11 are poorly located for access to community facilities and do not encourage walking because of poor access into the village, therefore are likely to have a negative impact. Site 14, because of its location further from the village would definitely have a significant negative impact.
8/Soc -	+?	+?	0	-	+?	+?	+?	-?	-	-	-	+?		Site 7 would be likely to have a positive impact, being well located for pedestrian access

Assessment of Neighbourhood Plan policy options

Site Allocation Policies - Housing Site Allocations

Policy Options:

To allocate any one or a combination of Site Options (1 to 14) to address the housing needs of Stradbroke and to contribute towards the wider housing needs of Mid Suffolk district as one of the Core Villages.

Sustainability theme	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6	Site 7	Site 8	Site 9	Site 10	Site 11	Site 12	Site 14	Summary of appraisal
Transport & Movement														into the centre of the village, subject to pedestrian access improvements being made on Mill Lane. Sites 1, 2, 5, 6 and 12 would also possibly have a positive impact, being easily accessible on foot to the centre of the village. Site 8 may possibly have a negative impact, as it is unclear whether a pedestrian footway can be provided to link up with the existing footways. Sites 4, 9, 10 and 11 are poorly located for pedestrian access so would definitely have a negative effect. Site 14, because of its location further from the village would definitely have a significant negative impact.
9/Soc – Services	0	0	0	0	0	0	0	0	0	0	0	0	0	None of the sites would provide new services on site.

Site options with potential for allocati	on:
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Site 1 – Land north of Laxfield Road Site 6 – Land north of Meadow Way

Site 2 – Land east of Farriers Close Site 7 – Land south of Mill Lane

Site 3 – Land south of New Street Site 8 – Land east of Queen Street

Site 5 – Land at Meadow Way and Cottage Farm Site 12 – Land north of Shelton Hill

Summary and conclusion:

In total, 8 sites had potential for allocation. All other sites had at least one negative or significant negative impact. In particular this related to the relationship that the site has with the existing built up area (and the related impact on the environment) and the limited ability of the sites to provide additional community benefits or easy, sustainable access (pedestrian access in particular) to community facilities. The 8 sites identified are either capable of mitigating any possible negative impacts or will provide positive or significant positive benefits which meet the objectives of the Neighbourhood Plan.

It should be noted that this does not mean than all 8 sites should automatically be allocated for development. The overall housing requirement and fundamental constraints on growth have a bearing on the sites that should be allocated and the quantum of development that they can provide. This is addressed earlier in this section.

Cumulative effects of Neighbourhood Plan policies

- 8.18 While some of the policy options may individually have a minor impact (either positive or negative) on the environmental, social and economic characteristics of the parish, collectively they may have a much more significant impact. As part of this appraisal, the combined impacts of the policy proposals have been considered. It is acknowledged that there are a number of uncertainties in this respect, especially when considering the effects over the time scale of the Plan.
- 8.19 In most cases, assessing the social and economic effects of a policy results in many of the negative environmental sustainability impacts identified for individual policies being cancelled out. When appraising the cumulative impacts of all the policies within the Neighbourhood Plan these negative impacts have been addressed by other policies, illustrated in Table 8.1 below.
- 8.20 Any allocation for residential use will need to ensure that any impacts on the countryside are mitigated through the appropriate provision of landscape buffers where sites are adjacent to open countryside. Equally, possible impacts on heritage assets must be appropriately mitigated.

Table 8.1: Cumulative impact of Neighbourhood Plan policies

	Sustainability Objectives								
Policy	1	2	3	4	5	6	7	8	9
STRAD 1	+?	+	+?	0	-?	+	+	+	+
STRAD 2	+	0	0	0	+?	+?	0	0	0
STRAD 3	0	++	0	0	0	0	0	0	0
STRAD 4	+	0	0	0	0	0	0	0	0
STRAD 5	+	0	0	0	0	0	0	0	0
STRAD 6	0	0	0	0	0	+?	+?	0	+?
STRAD 7	0	0	0	0	0	+	+	0	+
STRAD 8	0	0	0	0	0	+	0	++	+
STRAD 9	0	0	0	0	0	0	0	0	0
STRAD 10	0	0	0	0	0	0	0	+	0
STRAD 11	++	0	0	0	0	+	+	0	0
STRAD 12	0	0	0	0	++	0	0	0	0
STRAD 13	+	0	0	0	0	0	0	0	0
STRAD 14	-?	0	+	0	0	0	0	0	0
STRAD 15	-?	0	+?	+	0	0	0	0	0
STRAD 16	-?	+	0	0	0	+	+	+?	0
STRAD 17	0	+	0	0	-?	+	++	+?	0
STRAD 18	-?	+	0	0	0	++	++	0	0
STRAD 19	-?	++	0	0	-?	+	++	+?	0
STRAD 20	Not	assessed	- site allo	cation alre	ady has t	he benefit	of plannir	ng permiss	sion

9 OVERALL CONCLUSION

- 9.1 For some of the policies that have a negative impact on the environment, there are other aspects that contribute positively to social or economic objectives. Other policies in the Neighbourhood Plan and the Mid Suffolk District Council documents which make up the development plan should mitigate these negative environmental impacts.
- 9.2 Overall the most sustainable policy options have been chosen for inclusion in the Neighbourhood Plan. None have any significant adverse effects, giving confidence that the policies in the Plan will contribute to sustainable development.

Appendix A Summary of responses from statutory bodies during SA scoping process

Statutory body and response	How response has been dealt with
The "Water" section in Chapter 3 should cite the "Anglian River basin management plans: 2015" as baseline data and a description of the sustainability issues for the local river network	- This has been added in.
- The Soil and Geology section could also reference our maps for Nitrate Vulnerable Zones caused by diffuse pollution from agriculture.	- This has been added in.
Historic England We are pleased to note the consideration of the historic environment in Section 3 of the Scoping Report, and consider that the maps provided are helpful. However, although it is difficult to disagree with paragraph 3.24, we suggest that this could be fleshed out to briefly identify the particular qualities that contribute to the parish and village's character and appearance. We would refer you to Stradbroke's Conservation Area Appraisal, which may be of use in providing this information	- This has been added in.

No response was received from Natural England.

Appendix B Summary of relevant plans and programmes

International context

Key objectives	Key targets/indicators	Key implications for NP and SEA					
	EU Habitats and Conservation of Wild Birds Directives (92/43/EEC and 79/409/EEC)						
To conserve fauna and flora and natural habitats of EU importance by the establishment of a network of protected areas throughout the European Community. This was designed to maintain both the distribution and abundance of threatened species and habitats.	Identifies endangered habitats and species requiring protection and need for reestablishment of denuded biotopes. Protected areas should be created, maintained and managed.	Plans should take account relevant SPA and SAC sites. If negative impacts are anticipated appropriate assessments should be undertaken. Above protecting the integrity and interest of European sites, the NP should consider objectives to protect and if possible, enhance biodiversity.					
EU Water Framework Direct	tive (2000/60/EC)						
To expand the scope of water protection to all waters, surface waters and groundwater. • Achieve 'good status' for all waters by 2015. • Water management should be based on river basins and a 'combined approach' of emission limit values and quality standards. • Water management should include the closer involvement of community.	Prevent deterioration in the status of aquatic ecosystems, provide protection and improve ecological condition: achieve at least good status for all water bodies by 2015 (or later subject to specific criteria). meet the requirements of WFD protected areas promote sustainable use of water conserve habitats and species that depend directly on water progressively reduce or phase out pollutants that pose significant threats to the aquatic environment / groundwater help mitigate the impacts of floods and droughts.	Plan should consider any significant hydrological / hydrogeological factors and ensure integration with existing catchment management plans. Plan should consider including objectives to protect and enhance water resources, quality and ecological function.					
	r Quality and Cleaner Air for E						
Establishes limit values and alert thresholds for concentrations of key pollutants in ambient air including sulphur dioxide, nitrogen dioxide (NO ₂)/oxides of nitrogen and	Establishes limit values and alert thresholds for concentrations of key pollutants in ambient air including sulphur dioxide, nitrogen dioxide (NO ₂)/oxides of nitrogen and particulate	Establishes limit values and alert thresholds for concentrations of key pollutants in ambient air including sulphur dioxide, nitrogen dioxide (NO ₂)/oxides of nitrogen and particulate					

Key objectives	Key targets/indicators	Key implications for NP and SEA
particulate matter (PM _{2.5} and PM ₁₀). Maintain ambient air quality in areas where it is good and improve it in others.	matter (PM _{2.5} and PM ₁₀). Maintain ambient air quality in areas where it is good and improve it in others.	matter (PM _{2.5} and PM ₁₀). Maintain ambient air quality in areas where it is good and improve it in others.
EU Waste Directive (2008/	98/EC)	
Sets the basic concepts and definitions related to waste management, such as definitions of waste, recycling, recovery. It explains when waste ceases to be waste and becomes a secondary raw material (so called end-of-waste criteria), and how to distinguish between waste and byproducts.	Sets the basic concepts and definitions related to waste management, such as definitions of waste, recycling, recovery. It explains when waste ceases to be waste and becomes a secondary raw material (so called end-of-waste criteria), and how to distinguish between waste and by-products.	Sets the basic concepts and definitions related to waste management, such as definitions of waste, recycling, recovery. It explains when waste ceases to be waste and becomes a secondary raw material (so called end-of-waste criteria), and how to distinguish between waste and byproducts.
EU Thematic Strategy on A	ir Pollution	
Establishes interim objectives for air pollution in the EU and proposes appropriate measures for achieving them. It recommends that current legislation be modernised, be better focused on the most serious pollutants and that more is done to integrate environmental concerns into other policies and programmes.	Establishes interim objectives for air pollution in the EU and proposes appropriate measures for achieving them. It recommends that current legislation be modernised, be better focused on the most serious pollutants and that more is done to integrate environmental concerns into other policies and programmes.	Establishes interim objectives for air pollution in the EU and proposes appropriate measures for achieving them. It recommends that current legislation be modernised, be better focused on the most serious pollutants and that more is done to integrate environmental concerns into other policies and programmes.

National and regional context

Key objectives	Key targets/indicators	Key implications for NP
National Planning Policy Fra	amework (March 2012)	and SEA
Planning should drive and support sustainable economic development. It should: • secure high quality design and good standard of amenity • take account of the different roles of areas, recognising the intrinsic character and beauty of the countryside • support transition to a low carbon future in a changing climate, taking account of flood risk and encourage the reuse of existing resources and encouraging the use of renewable resources. • contribute to conserving and enhancing the natural environment and reducing pollution. • encourage the effective use of land by reusing land that has been previously developed. • conserve heritage assets in a manner appropriate to their significance. • focus significant development in locations which are, or can be made sustainable.	Supports local and national targets with regard to biodiversity and geodiversity.	Plan should contribute to the objective of achieving sustainable development (social, economic and environmental). SA Objectives should reflect the core planning principles and policies set out in the NPPF. The Plan should:
Paragraph 17: "planning should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations."		The Plan should ensure that development does not have a detrimental impact on any heritage assets and should seek to ensure that development actively conserves the asset.
Paragraph 132: "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight		

Key objectives	Key targets/indicators	Key implications for NP and SEA
should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly		
exceptional.		
Section 66: Requires special regard for the desirability of preserving listed buildings and their settings.	inning Act	The NP must ensure that the listed buildings and their settings are not affected by proposed development.
Section 72: Special attention to be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.		The NP should consider policies to preserve and enhance the character of conservation areas.
The Waste (England & Wale	es) Regulations 2011	
To encourage/ensure waste arises/is dealt with further up the waste hierarchy. Divert waste disposal away from landfill.	Target of 50% of household waste to be recycled.	Plan must have regard to the amended waste hierarchy. Policies and objectives should where possible encourage waste to be re-used, recycled or have value / energy recovery. If possible the Plan should discourage landfilling of waste.
The Act introduced a	Target of reducing carbon	Planning can make a
statutory target for reducing	emissions by 80 per cent	contribution to mitigating and

Key objectives	Key targets/indicators	Key implications for NP and SEA
carbon emissions.	below 1990 levels by 2050, with an interim target of 34% by 2020.	adapting to climate change by influencing the location, scale and character of development. The plan should include policies / objectives that contribute towards achieving lower carbon emissions and greater resilience to the impacts of climate change.
Flood and Water Manageme		
Improve the management of flood risk for people, homes and businesses. To protect water supplies.	Local Authorities to prepare flood risk assessments, flood maps and plans. EA to prepare Local flood risk management strategies.	Plan should take account of flooding and water management issues and strategies and consider the inclusion of policies / objectives to reduce flood risks and other impacts on the water environment.
Carbon Plan: Delivering our	low carbon future 2011	
Government-wide plan for action on climate change at domestic and international levels.	ncludes a range of sector- based plans and targets for low carbon: • building • transport • industry • electricity agriculture, land use, forestry and waste	The Plan should include policies / objectives that contribute towards achieving lower carbon emissions.
Mainstreaming sustainable	development 2011	
This refreshed vision builds upon the principles that underpinned the UK's 2005 SD strategy, recognising the needs of the economy, society and the natural environment, alongside the use of good governance and sound science.	Promises a new set of indicators from DEFRA that link initiatives and include wellbeing.	Plan should take account of climate change and promote sustainability through sustainable, low carbon and green economic growth.
	anging Climate, Defra 2010	Carla ka wada a a a a a a libaki a a
Seeks to reduce air pollution by focusing on the synergies between air quality and climate change.	Seeks to reduce air pollution by focusing on the synergies between air quality and climate change.	Seeks to reduce air pollution by focusing on the synergies between air quality and climate change.
The strategy considers what	r improving sustainable trans The strategy considers what	The strategy considers what
is necessary to ensure that people can be confident in choosing sustainable transport.	is necessary to ensure that people can be confident in choosing sustainable transport.	is necessary to ensure that people can be confident in choosing sustainable transport.
Forum)	, , (2.000 00 2	

Key objectives	Key targets/indicators	Key implications for NP and SEA						
Provides a coherent vision to safeguard and enhance the regions biodiversity and wildlife. Embed a landscape scale approach to restoring whole ecosystems in the working practices and policies of all partners. Create the space needed for wildlife to respond to climate change. Enable all organisations in the East of England to support and improve biodiversity.	Provides a framework for the delivery of biodiversity targets through biodiversity opportunity areas and habitat and species targets.	The NP should consider objectives to protect and where possible, enhance biodiversity.						
Anglian river basin district River Basin Management Plan: 2015								
By 2027, 82% of surface waters (rivers, lakes, estuaries and coastal waters) will have at least 'good' status.	By 2027, 82% of surface waters (rivers, lakes, estuaries and coastal waters) will have at least 'good' status.	The NP needs to consider the impact of proposed development on water quality.						

County/local context

Key objectives	Key targets/indicators	Key implications for Neighbourhood Plan and Sustainability Appraisal
Suffolk Local Transport Plan 201	1-2031	
To ensure that transport investment supports the economic and business growth strategies in the county.	Indicators include: congestion, mode of travel to work and school, cycling trips, accessibility, road traffic accidents, road and footway maintenance, street lighting, highway structures, road flooding, air quality and transport emissions.	The Plan should consider policies / objectives which contribute to transport sustainability. This should go beyond reducing carbon emissions to include economic growth, safety, pollution, traffic reduction and access to services.
Suffolk Waste Core Strategy 201		T 51
By 2026, the landfilling of untreated municipal, commercial & industrial wastes will have ceased and residual waste management processes will be fully operational, recovering value from wastes that cannot practicably be recycled or composted.	To only make provision for a declining amount of landfill over the plan period with 'zero waste to landfill' by 2026.	The Plan should consider how, within the context of a growing population in Stradbroke, waste generation can be minimised and it can be ensured that Stradbroke contributes towards the target of zero waste to landfill.
Suffolk Biodiversity Action Plan		
 Maintain and, where practicable, enhance the wildlife and habitats that provide the natural character and diversity of Suffolk To ensure lawful compliance towards biodiversity in planning decisions. To promote best practice and provide support to planners on biodiversity issues. To ensure the planning system contributes to the Natural Environment White Paper 2011 objective of no net loss of biodiversity as part of sustainable development. 	 Ensure development avoids adverse impacts on biodiversity Where avoidance is not possible, mitigate residual impacts of developments. Where mitigation is not possible, compensate for losses incurred during development. Enhance developments for biodiversity. Ensure biodiversity is taken into consideration during, and after, the construction phase of development. 	The Plan should consider policies / objectives to enhance (where possible) the wildlife and habitats that give rise to Suffolk's natural character and diversity.
Babergh and Mid Suffolk Landsc		The Plan should
Improve the quality of development coming forward in the countryside To provide more detailed design guidance for new	Ensure developments fit in with their surroundings and help to retain and enhance the distinctive character of their area.	consider the character of developments and ensure they are of good and appropriate

Key objectives	Key targets/indicators	Key implications for Neighbourhood Plan and Sustainability Appraisal	
buildings, changes of use and smaller scale alternations. To set out strategic policies on development and broad policies to protect the appearance and character of the landscape according to appropriate Landscape Character Assessment areas.	 Understand different landscape characters and how the settlements within them relate to one another. Safeguard ancient woodlands and hedges, particularly those of locally native species. Safeguard the mosaic pattern of pasture, heath and woodlands. Protect Parkland areas, Village Greens, Tyes and commons features. Maintain and enhance the landscape and settlement pattern and retain a sense of separation between settlements. Enhance meadows and woodlands cover. Safeguard floodplains. Protect and enhance the ecological environment. 	design quality according to the historical setting of the Parish. This should include measures to protect and enhance the surrounding area according to its Plateau Claylands designation.	
Mid Suffolk Strategic Flood Risk			
Identifies all areas of flood risk within the district as well as what the level of risk is	Flood zone	The Plan needs to ensure that new development avoids areas identified at risk of flooding and that the existing level of flood risk within and outside Stradbroke is not exacerbated and, where possible, reduced.	
Suffolk County Council Landscap		T D	
To map and record the value and variety of the Suffolk landscape.	No targets	The Plan should ensure that the development strategy is in keeping with the local landscape typologies	
Suffolk Historic Landscape Characterisation – Suffolk County Council, 2009			
To identify areas or units of land based on their key historic landscape attributes.		The Plan should ensure that areas of historic landscape character are preserved and	

Key objectives	Key targets/indicators	Key implications for Neighbourhood Plan and Sustainability Appraisal	
Babergh and Mid Suffolk Sustair	ability Appraisal Scoping Bon	enhanced.	
To form the framework for the sustainability appraisal of the emerging Joint Local Plan by setting out sustainability objectives and indicators	 Assessing how the draft policies relate to other relevant plans and programmes. Setting out the broad environmental, social and economic characteristics. Identifying sustainability issues particular to the area. Developing sustainability objectives against which the policies and strategic allocations may be assessed. Assessing objectives against the identified sustainability objectives. Identify other relevant plans, programmes and sustainability objectives. 	The Plan should ensure that the scope of its sustainability objectives reflect and help to achieve the district-level objectives.	
Stradbroke Conservation Area Appraisal, 2011 To demonstrate 'quality of place', • To demonstrate 'quality of To demonstrate			
sufficient for the briefing of the Planning Officer when assessing proposed works in the area.	place', sufficient for the briefing of the Planning Officer when assessing proposed works in the area.	'quality of place', sufficient for the briefing of the Planning Officer when assessing proposed works in the area.	