

Debenham Neighbourhood Plan

SEA Environmental Report

June 2018

Quality information

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Non-Technical Summary

What is strategic environmental assessment?

A strategic environmental assessment (SEA) has been undertaken to inform the Debenham Neighbourhood Plan (DNP). This process is required by the SEA Regulations.

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental and socio-economic effects through the Neighbourhood Plan, and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of its residents.

What is the Debenham Neighbourhood Plan?

The DNP covers the parish of Debenham in Mid Suffolk for the period to 2036. Prepared to be in general conformity with the adopted Mid Suffolk Core Strategy (2008) & Focused Review (2012) and emerging Babergh and Mid Suffolk Joint Local Plan, it sets out a vision and a range of policies for the Neighbourhood Plan area. These relate to a range of topics, including, but not limited to, the quality of life of residents and the protection and enhancement of the environment.

The DNP was submitted to Mid Suffolk District Council in summer 2018. This Environmental Report accompanies the Submission version of the DNP.

Purpose of this Environmental Report

The purpose of this Environmental Report is to:

- Identify, describe and evaluate the likely significant effects of the Submission version of the DNP and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the DNP and its relationship with other relevant policies, plans and programmes;
- Relevant aspects of the current and future state of the environment and key sustainability issues;
- The SEA Framework of objectives against which the DNP has been assessed;
- The appraisal of alternative approaches for the DNP;
- The likely significant environmental effects of the DNP;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the DNP; and
- The next steps for the DNP and accompanying SEA process

Assessment of alternative approaches for the Debenham Neighbourhood Plan

A key aim of the Neighbourhood Plan is to ensure that housing delivered in the parish is appropriately located for local needs.

The Neighbourhood Plan has been prepared to be general conformity with the adopted Mid Suffolk Core Strategy (2008) & Focused Review (2012) and emerging Babergh and Mid Suffolk Joint Local Plan

Due to uncertainties relating to how much housing to deliver in the Neighbourhood Plan area, Debenham Parish Council has been in discussion with Mid Suffolk District Council to ascertain a suitable housing target for the area. Based on Debenham Parish Council's discussion with the District Council, a final target of up to 264 homes has been included with the Neighbourhood Plan, including an allowance for 54 homes to come forward through windfall development. This brings the total number of homes to be delivered within the DNP area over the Neighbourhood Plan period to up to 318 homes.

Assessment of alternative housing sites for allocation

Following advice from Mid Suffolk District Council, in July 2017, the Parish Council resolved to undertake its own assessment of sites available in the Neighbourhood Plan area. A Local Plan call for sites was undertaken through a Public Sites Submission exercise, and seven sites were identified. The locations of these sites are presented in Figure 4.1.

The sites were then considered by the Neighbourhood Plan Steering Group as potential locations for housing allocations to be taken forward for the purposes of the Neighbourhood Plan. Financial assistance was sought from Locality, and AECOM was commissioned to undertake an independent and objective site assessment of the seven sites.

To support the consideration of the suitability of these sites, the SEA process also undertook an appraisal of the key environmental constraints present at each of the sites and potential effects that may arise as a result of housing development at these locations.

Table: Sites considered for the Debenham Neighbourhood Plan

AECOM site Ref	PSS site Ref.	Location/description	Site area (ha) ¹	Status in the SHLAA	Current land use
1	SS0031	Land north of Ipswich Road	4	Accepted- reference DEB01	Agricultural
2	SS0267	Land north of Gracechurch Street	11.6	Partially accepted- reference DEB(NS)02	Agricultural
3	SS0268	Land east of Aspell Road (opposite primary school)	2.5	Accepted- reference DEB(NS)03	Agricultural
4	SS0364	Land west of Priory Lane	0.74	Not assessed	Woodland
5	SS0588	Land north of Gull Farm	5.53	Not assessed	Agricultural
6	SS0642	Land north of Low Road	13.5	Not assessed	Agricultural
7	SS0902	Land south of Low Road	1.0	Not assessed	Agricultural

¹ AECOM measurement

Sites allocated by the Neighbourhood Plan

Following the consideration of the SEA findings, the site assessment undertaken for the Neighbourhood Plan, consultation events and the views, concerns and aspirations of local residents, the current version of the Neighbourhood Plan allocates three sites for housing, as follows:

- SS0031 Land north of Ipswich Road
- SS0268 Land east of Aspall Road (opposite primary school)
- SS0902 Land south of Low Road.

Assessment of the current version of the DNP

The current consultation version of the DNP presents 23 planning policies for guiding development in Neighbourhood Plan area.

Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the SEA process has assessed the policies put forward through the current version of the DNP. The Environmental Report has presented the findings of the assessment under the following SEA themes:

- Climate change
- Landscape and historic environment
- Land, soil and water resources
- Population and community
- Health and wellbeing
- Transportation.

The assessment has concluded that the current version of the Debenham Neighbourhood Plan is likely to lead to significant positive effects in relation to the 'Population and Community' and 'Health and Wellbeing' SEA themes. These benefits largely relate to the Neighbourhood Plan's focus on delivering housing which meets local needs, and enhancing the quality of life of residents, including through supporting community cohesion and on protecting and enhancing the built and natural environment. In addition, the Neighbourhood Plan has a strong focus on protecting and enhancing villagescape character and the setting of the historic environment, This will lead to significant positive effects in relation to the 'Landscape and Historic Environment' theme.

In relation to the 'Transportation' theme the Neighbourhood Plan has a close focus on limiting the impact of housing growth on congestion in the village, including at key pinchpoints on the road network, and on promoting walking and cycling as an alternative to the private car. This will bring significant positive effects.

The Neighbourhood Plan will also initiate a number of beneficial approaches regarding the 'Climate Change' SEA theme, helping to limit per capita greenhouse gas emissions and support the resilience of the Neighbourhood Plan area to the likely impacts of climate change. However these are not considered to be significant in the context of the SEA process given the scope of the Neighbourhood Plan and the scale of proposals.

In relation to the 'Land, Soil and Water Resources' SEA theme, the allocations proposed through the Neighbourhood Plan will lead to a loss of productive agricultural land. However the significance of these negative effects on soils resources is uncertain given that recent detailed agricultural land classification has not been undertaken in the Neighbourhood Plan area.

Next steps

This Environmental Report accompanies the Submission version of the Debenham Neighbourhood Plan.

At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the emerging Babergh and Mid Suffolk Joint Local Plan and adopted Mid Suffolk Core Strategy.

If the subsequent Independent Examination is favourable, the DNP will be subject to a referendum, organised by Mid Suffolk District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the DNP will become part of the Development Plan for Debenham Parish.

1. Introduction

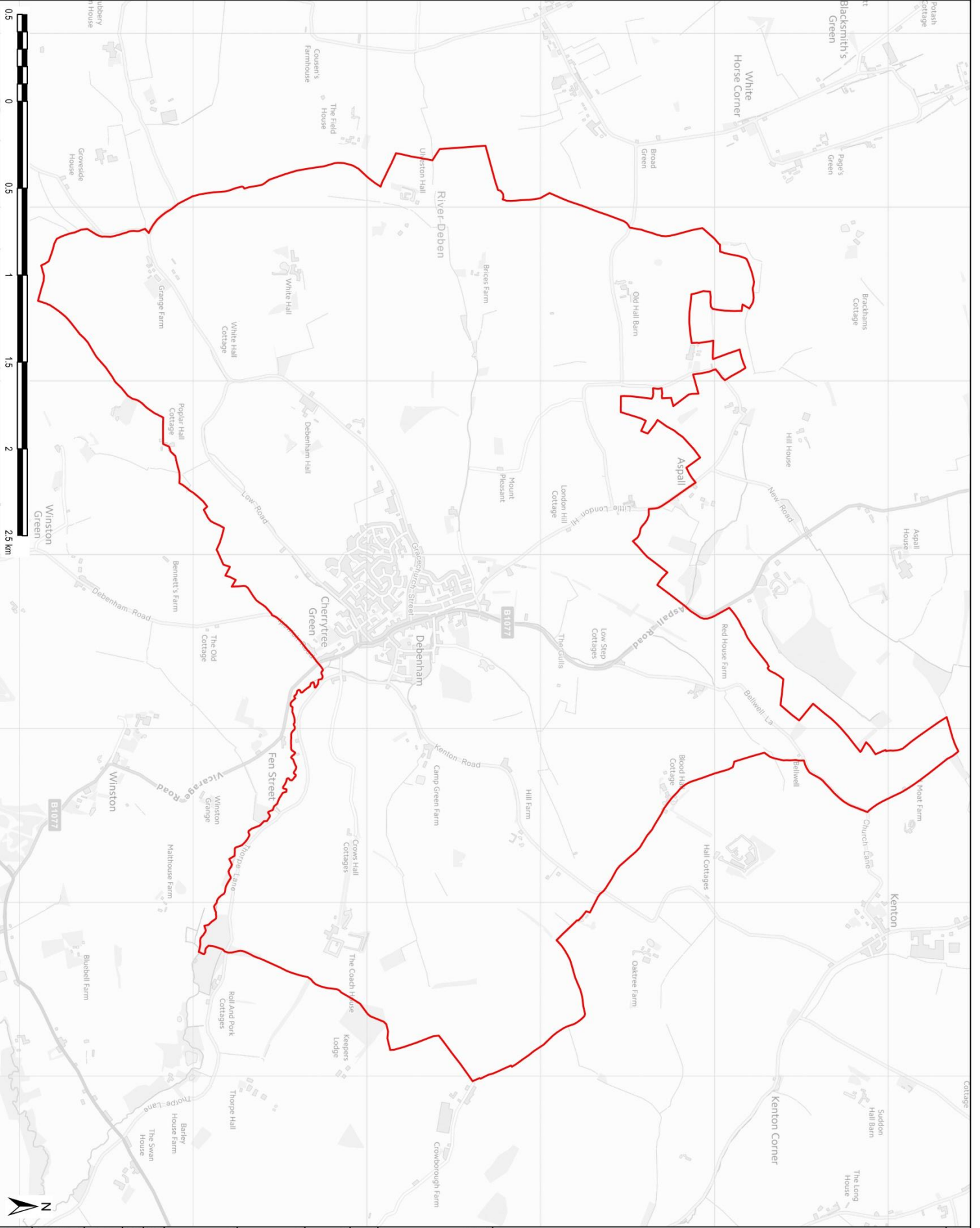
Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment in support of the emerging Debenham Neighbourhood Plan (hereafter referred to as the DNP).
- 1.2 The DNP is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The DNP is being prepared in the context of the adopted Mid Suffolk Core Strategy (2008) and Focussed Review (2012) and the emerging Babergh and Mid Suffolk Joint Local Plan.
- 1.3 Key information relating to the DNP is presented in Table 1.1.

Table 1.1: Key facts relating to the Debenham Neighbourhood Plan

Name of Responsible Authority **Debenham Parish Council**

Title of Plan	Debenham Neighbourhood Plan (DNP) 2016 to 2036
Subject	The DNP is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with the emerging Mid Suffolk and Babergh Joint Local Plan. It will be used to guide and shape development in the Neighbourhood Plan area.
Purpose	The DNP area covers the administrative area of Debenham Parish. See Figure 1.1.
Timescale	To 2036
Area covered by the plan	Debenham Parish Council
Summary of content	The Debenham Neighbourhood Plan will set out a vision, strategy and range of policies for the Neighbourhood Plan area.
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LEGEND

- Debenham Neighbourhood Plan Area

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Purpose of Issue
DRAFT

Client
DEBENHAM PARISH COUNCIL

Project Title
DEBENHAM NEIGHBOURHOOD PLAN

Drawing Title
DEBENHAM NEIGHBOURHOOD PLAN AREA

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FIGURE 1.1

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SEA explained

- 1.4 The DNP has been screened in by Essex County Council as requiring an SEA.
- 1.5 SEA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and reasonable alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the DNP plan-making process with a view to avoiding or mitigating negative environmental effects and maximising positive effects. Through this approach, the SEA for the DNP seeks to maximise the emerging Neighbourhood Plan's contribution to sustainable development.
- 1.6 The SEA has been prepared in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU strategic environmental assessment (SEA) Directive.²
- 1.7 The SEA Regulations require that a report is published for consultation alongside the draft plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the DNP.
- 1.8 In line with the SEA Regulations this Environmental Report must essentially answer four questions:
 - What is the scope of the SEA?
 - What has plan-making/SEA involved up to this point?
 - 'Reasonable alternatives' must have been assessed for the DNP.
 - What are the assessment findings at this stage?
 - i.e. in relation to the draft plan.
 - What happens next?
- 1.9 These questions are derived from Schedule 2 of the SEA Regulations, which present 'the information to be provided within the report'. Table 1.2 presents the linkages between the regulatory requirements and the four SEA questions.

Structure of this Environmental Report

- 1.10 This document is the Environmental Report for the DNP and hence needs to answer all four of the questions listed above with a view to providing the information required by the SEA Regulations.
- 1.11 Each of the four questions is answered in turn within this report, as follows:

² Directive 2001/42/EC

Table 1.2: Questions that must be answered by the Environmental Report in order to meet regulatory³ requirements

Environmental Report question	In line with the SEA Regulations, the report must include...⁴	
What's the scope of the SEA?	What is the DNP seeking to achieve?	An outline of the contents, main objectives of the DNP and relationship with other relevant plans and programmes
	What is the sustainability 'context'?	The relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the DNP including those relating to any areas of a particular environmental importance
	What is the sustainability 'baseline'?	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the DNP The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the DNP including those relating to any areas of a particular environmental importance
	What are the key issues & objectives?	Key problems/issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
What has plan-making/ SEA involved up to this point?	Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the draft plan.	
What are the assessment findings at this stage?	The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
What happens next?	The next steps for plan making/SEA process.	

³ Environmental Assessment of Plans and Programmes Regulations 2004

⁴ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

2. Local Plan context and Vision

Local Plan context

- 2.1 The adopted Mid Suffolk Core Strategy (2008) & Focused Review (2012) present the current strategic planning policy for the DNP area and wider District. The Core Strategy was originally adopted in 2008 and includes a number of policies related to a strategy for growth in the District, the delivery of growth and the provision of infrastructure. A Sustainability Appraisal was carried out for the Core Strategy as well as a Habitat Regulations Assessment. The Core Strategy categorised Debenham as a 'Key Service Centre' and establishes that towns should be the main focus for development in the District, and that Key Service Centres are the main focus for development outside of the towns. Policy CS1 Settlement Hierarchy of the Core Strategy states that:
- "The majority of new development (including retail, employment and housing allocations) will be directed to towns and key service centres."*
- 2.2 Policy CS8 of the Core Strategy provides the outline for housing distribution across Mid Suffolk. A total of 830 homes were proposed for the 15 year period between 2010 and 2025, with 500 of these being located within Key Service Centres.
- 2.3 The Core Strategy Focused Review (2012) sets a requirement of 750 new homes in the Key Service Centres between 2012 and 2027. Across all ten Key Service Centres, 424 new homes were completed between 2012 and 2016 which leaves a minimum of 326 new homes to be built in the remaining eleven years of the plan period.
- 2.4 Given that the Neighbourhood Plan is planning through to 2036, there is a need to make provision for a further nine years beyond the Core Strategy projection, thereby aligning the DNP to the emerging Joint Local Plan. In this context, the Joint Local Plan will set out the spatial plan for both Mid Suffolk and Babergh and the DNP is required to be in general conformity with the strategic policies of the Joint Local Plan. However, it can develop policies and proposals to address local place-based issues. In this way it is intended for the Joint Local Plan to provide a clear overall strategic direction for development in Debenham, with finer detail established by the DNP.
- 2.5 The current version of the Consultation Document states "For Mid Suffolk District, once development already built from 2014-2017 and committed through existing planning permissions has been taken account of, there is a residual need to plan for approximately 5,820 new homes by 2036."
- 2.6 The Regulation 18 stage Local Plan Consultation Document identifies Debenham as a Core Village, with a 'District Centre' role related to its defined Principal Shopping Area. A number of strategic options are being explored relevant to Debenham. These are:
- County Town Focus – 20% district growth in Core Villages
 - Market town / rural area balance – 20% - 25% district growth in Core Villages
 - Transport corridor focus – 30% district growth in Core Villages
 - New Settlement focus – 15% district growth in Core Villages
- 2.7 The emerging Local Plan has reviewed Settlement Boundaries and shows three potential development sites adjacent to the existing settlement boundary of Debenham village, and also illustrates proposed extensions to the settlement boundary.

Vision and objectives for the DNP

2.8 The vision statement for the DNP area is as follows:

“Debenham will strive to celebrate its proud heritage, develop a vibrant economy, and support a thriving community. Our community will endeavour to ensure that it remains at ease with itself.”⁵

2.9 The Vision for the DNP is supported by a range of key objectives which are as follows:

- Objective 1: To provide new and appropriate housing that meets the needs of our community, in areas that are the most appropriate in terms of their impact on the village, and that provide for the potential number of homes that would satisfy the requirements in the emerging Joint Local Plan
- Objective 2: To ease and improve the traffic flow and parking around, and in the village
- Objective 3: To support initiatives which enhance the diversity of the local economy
- Objective 4: To protect and enhance the unique and special character of Debenham for residents and visitors
- Objective 5: To ensure that with any new housing growth, appropriate infrastructure is provided in a timely manner.

⁵ Debenham Neighbourhood Plan (2017) Draft Pre Submission Document [online] available at: <http://debenhamnp.onesuffolk.net/assets/documents/Draft-NP-v-35b.pdf>

3. The Scope of the SEA

SEA Scoping Report

- 3.1 The SEA Regulations require that: “*When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are Natural England, the Environment Agency and Historic England. These authorities were consulted on the scope of the DNP SEA in April 2018.
- 3.2 The purpose of scoping was to outline the ‘scope’ of the SEA through setting out:
- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
 - Baseline data against which the Neighbourhood Plan can be assessed;
 - The key sustainability issues for the Neighbourhood Plan; and
 - An ‘SEA Framework’ of objectives against which the Neighbourhood Plan can be assessed.
- 3.3 Baseline information (including the context review and baseline data) is presented in Appendix A.
- 3.4 Comments received on the Scoping Report, and how they have been considered and addressed, are presented in Table 3.1.

Table 3.1: Consultation responses received on the SEA Scoping Report

Comment	Response
Environment Agency	
No comments on the scoping report were received from the Environment Agency	n/a
Historic England (Edward James, Historic Places Advisor, East of England)	
Conserving the historic environment in a manner appropriate to its significance is a core planning principle as set out in paragraph 17 of the National Planning Policy Framework (the Framework). We welcome therefore the references to the ‘proud heritage’ and ‘special character’ of Debenham which are included in the Vision and Objectives for the DNP, found on page 2 of the Scoping Report.	Noted
We are pleased to note the inclusion of the Debenham Conservation Area Appraisal in the literature review, as well as the discussion of the local historic environment and landscape in the baseline information section, including useful reference to the Suffolk County Historic Environment Record.	Noted
The Scoping Report makes reference to the lack of a nationally defined list of Grade II listed buildings at risk outside of London, and notes that it is therefore not possible to determine whether any buildings designated at this category in the neighbourhood area are at risk. We recognise that this is the case, but would encourage the neighbourhood plan forum generally to undertake an assessment of the GII listed buildings in their area to ascertain whether any are in poor condition. The Neighbourhood Plan could then include a policy to facilitate their repair or conservation. This would augment the neighbourhood plan’s potential to enhance the historic environment of Debenham, which would contribute positively to its assessment as part of the SEA process.	Noted
Natural England (Dawn Kinrade, Technical Services, Consultation Team)	
Natural England did not have any comments to make regarding the scoping report.	n/a

Key sustainability issues

- 3.5 Drawing on the review of the sustainability context and baseline, the SEA Scoping Report was able to identify a range of key sustainability issues that should be a particular focus of SEA. These issues are set out below, presented under eight SEA themes:

Air Quality

- 3.6 There are no Air Quality Management Area (AQMA), and air quality is not automatically monitored anywhere within the DNP area as part of the Air Quality Updating and Screening Assessment process carried out by Mid Suffolk District Council.
- 3.7 No locations are at risk of exceedances of the pollutants which contribute to air quality issues.
- 3.8 Due to the absence of any significant air quality issues within the Neighbourhood Plan area, the **air quality theme has been scoped out for the purposes of the SEA process.**

Biodiversity

- 3.9 There are no Sites of Special Scientific Interest (SSSI) located within the DNP area. However, the Mickfield Meadow is located 285 metres from the western DNP area boundary. As such, Natural England will need to be consulted on any development within 710 metres of the western boundary of the DNP comprising of 50 or more houses. However, this location is separate from the existing built up areas of the parish and comprises open countryside.
- 3.10 The key biodiversity features within the Neighbourhood Plan Area are isolated patches of Biodiversity Action Plan Priority Habitat.
- 3.11 As concluded by the SEA Screening Opinion produced for the Neighbourhood Plan by Essex County Council, the current provisions of the Local Plan and emerging DNP policies will help ensure that development proposals will not result in significant impacts on biodiversity. In light of the lack of other biodiversity designations within the DNP area, it was considered that biodiversity should not be focus of further SEA assessment work and that **biodiversity should be scoped out for the purposes of the SEA process.**

Climate Change

- 3.12 Any increase in the built footprint of the DNP area (associated with the delivery of new housing and employment land) has the potential to increase overall greenhouse gas emissions.
- 3.13 Mid Suffolk has generally had a higher per capita emissions total in comparison to the trends and for the East of England and England between 2005 and 2015. It has also seen a smaller reduction in the percentage of total emissions per capita between 2005 and 2015 compared to the East of England; however it is slightly higher than England.
- 3.14 The East Suffolk Catchment Flood Risk Management Plan highlights that there are currently 132 properties at risk from the 1% annual probability river flood. There is also risk from lower magnitude river floods in this settlement, with 100 properties at risk from the 10% annual probability river flood.

Landscape and Historic Environment

- 3.15 The DNP area contains a total of 93 Listed Buildings. Of this number, one is Grade I, seven are Grade II* and a further 85 are Grade II.
- 3.16 There are 230 archaeological records listed on the Suffolk Historic Environment Record. These finds are primarily comprised of Roman and Medieval pottery along with a number of Neolithic sites.
- 3.17 There are no designated heritage assets within the DNP area currently on Historic England's Heritage at Risk Register.

3.18 The Debenham Conservation Area covers the core of Debenham village.

Land, Soil, and Water Resources

3.19 The provisional Agricultural Land Quality dataset shows that there are areas of Grade 3 agricultural land across the entire DNP area. However, the data does not differentiate as to whether this is Grade 3a (e.g. the best and most versatile) or lower quality 3b land.

3.20 The river Deben flows through the DNP area, and in regards to water quality, in 2016 the overall water quality for the Deben (upstream of Brandeston Bridge) is described as being heavily modified and as being of moderate overall water quality.

Population and Community

3.21 The population of Debenham increased at a faster rate between 2001 and 2011 than the increases observed for Mid Suffolk, East England or England as a whole.

3.22 There are a higher proportion of residents within the 60+ age category in the DNP area (20.90%) in comparison to the percentages for Mid Suffolk, the East of England and the national average.

3.23 The DNP area generally experiences very low levels of deprivation, with the LSOA being within the least 10% to least 30% most deprived neighbourhoods in the country amongst the majority of deprivation indices.

Health and Wellbeing

3.24 The majority of residents in the DNP area consider themselves as having 'very good health' or 'good health'; this proportion is marginally lower than that seen in Mid Suffolk the East of England and England.

3.25 The total percentage of residents in the DNP area who report either 'bad health' or 'very bad health' is lower than the regional total and national total but is slightly higher than the total for Mid Suffolk.

3.26 The total percentage of residents in the DNP area who report either 'bad health' or 'very bad health' is higher than the district total but lower than both the regional and national totals.

3.27 Generally the level of disability in the DNP area is lower than that seen in East England and England, but marginally higher than that for Mid Suffolk.

Transportation

3.28 There are no railway stations directly within the DNP area, the nearest is located at Needham Market which is located approximately 11.2km from the DNP area.

3.29 In regards to the bus network, as of August 2017 the principal routes through the DNP area are the 114, 113, 115 and 116 services. The main through routes within the DNP area include the B1077 (Aspall Road) and Gracechurch Street.

3.30 86.6% of households in the Neighbourhood Plan area have access to at least one car or van; this is slightly lower than the value for Mid Suffolk (88.7%), but higher than that seen in the East of England and significantly higher than the average for England.

3.31 According to most recent census data, the most popular method of travelling to work in the Neighbourhood Plan area is via driving a car or van which is lower than the total for the district as a whole (48.5%), but slightly higher than the East (41.4%) and significantly higher than England (37.00%). The next most common form of travel to work in Debenham is by foot (8.34%); this level is higher than that seen in the district (5.8%), the East of England (6.8%) and England (7.0%).

SEA Framework

3.32 Table 3.2 presents the SEA objectives - grouped under six SEA theme headings - established through SEA scoping, i.e. in light of context/baseline review and consultation. Taken together, the SEA themes and objectives provide a methodological 'framework' for undertaking assessment.

Table 3.2: SEA framework

SEA themes	SEA objective	Assessment questions
Climate Change	Reduce the level of contribution to climate change made by activities within the Neighbourhood Plan area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Reduce the need to travel? • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources? • Reduce energy consumption from non-renewable resources?
	Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Ensure that inappropriate development does not take place in areas at higher risk of flooding, taking into account the likely future effects of climate change? • Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change? • Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)? • Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan area? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?
Landscape and Historic Environment	Protect, maintain and enhance the cultural heritage resource, including the historic environment and archaeological assets located within and within the setting of the Neighbourhood Plan area.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting? • Conserve and enhance the special interest, character and appearance of the Debenham Conservation Area and its setting? • Support the integrity of the historic setting of key buildings of cultural heritage interest? • Conserve and enhance local diversity and character? • Support access to, interpretation and understanding of the historic environment? • Conserve and enhance archaeological remains, including historic landscapes? • Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies.
	Protect and enhance the character and quality of landscapes and townscapes.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support the integrity of the Landscape in the Neighbourhood Plan area? • Conserve and enhance landscape and townscape features?
Land, Soil and Water Resources	Ensure the efficient use of land.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Promote the use of previously developed land? • Avoid the development of the best and most versatile agricultural land, which in the parish comprises Grade 3a agricultural land?
	Use and manage water resources in a sustainable manner.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support improvements to water quality? • Minimise water consumption?

SEA themes	SEA objective	Assessment questions
Population and Community	Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> Promote the development of a range of high quality, accessible community facilities? Encourage and promote social cohesion and encourage active involvement of local people in community activities? Minimise fuel poverty? Maintain or enhance the quality of life of existing local residents? Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people? Support the provision of land for allotments and cemeteries?
	Reduce deprivation and promote a more inclusive and self-contained community.	
	Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> Support the provision of a range of house types and sizes? Support enhancements to the current housing stock? Meet the needs of all sectors of the community? Provide quality and flexible homes that meet people's needs? Promote the use of sustainable building techniques, including use of sustainable building materials in construction? Provide housing in sustainable locations that allow easy access to a range of local services and facilities?
	Support a vibrant, mixed economy which enables residents of Debenham to work locally.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> Support and enhance the viability of small local businesses? The diversity of local business and the economy? Support employment opportunities which enable residents to work from home?
Health and Wellbeing	Improve the Health and Wellbeing residents within the Neighbourhood Plan area.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> Promote accessibility to a range of leisure, health and community facilities, for all age groups? Align to the vision and key themes of Joint Health and Wellbeing Strategy? Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards? Reduce noise pollution? Promote the use of healthier modes of travel? Improve access to the countryside for recreational use? Avoiding any negative impacts to the quality and extent of existing recreational assets, such as formal or informal footpaths?
Transportation	Promote sustainable transport use and reduce the need to travel.	<p>Will the option/proposal help to...</p> <ul style="list-style-type: none"> Support the goals outlined in the Suffolk Transport Strategy? Reduce the need to travel through sustainable patterns of land use and development? Encourage modal shift to more sustainable forms of travel? Enable sustainable transport infrastructure enhancements? Facilitate working from home and remote working? Improve road safety? Reduce the impact on residents from the road network?

4. What has plan making / SEA involved to this point?

Introduction

- 4.1 In accordance with the SEA Regulations the Environmental Report must include:
- An outline of the reasons for selecting the alternatives dealt with; and
 - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.2 The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, this section explains how preparation of the current version of the DNP has been informed by an assessment of alternative options for non-strategic scale development in the Neighbourhood Plan area.

Overview of plan making SEA work undertaken since 2013

- 4.3 Plan-making for the DNP has been underway since 2013. In addition to the undertaking of a range of evidence base studies for the Neighbourhood Plan, a number of community consultation and research events have taken place during plan-making. This has included consultation 'drop-in' and presentation sessions, leaflet drops to every households, online surveys (including for residents, young people and businesses) and a Housing Needs Survey. This extensive community consultation has directly fed into the plan making process.
- 4.4 The following sections discuss the evolution of the DNP in association with the SEA process.

Assessment of reasonable alternatives for the Neighbourhood Plan

- 4.5 A key element of the SEA process is the appraisal of 'reasonable alternatives' for the DNP. The SEA Regulations are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the '*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*'.
- 4.6 The following sections therefore describe how the SEA process to date has informed the preferred development strategy for the Neighbourhood Plan area and potential locations for proposed development.

Delivery of housing numbers through the DNP

- 4.7 Significant effects against SEA objectives are most likely to arise through the consideration of alternatives for the level and location of growth to be delivered in the Neighbourhood Plan area. When considering reasonable alternatives for the level and location of housing growth, as in many cases, the DNP Steering Group are limited in terms of potential alternatives that can be considered for the DNP, as it must be in general conformity with, and support, the strategic development needs set out in the Local Plan.
- 4.8 As such, the logical starting point for considering alternatives is therefore with the relevant Local Development Plan. In the case of the DNP, the current adopted Mid Suffolk Strategy carries the most existing weight in planning decisions.
- 4.9 The Core Strategy Focused Review (2012) sets a requirement of 750 new homes in the Key Service Centres (KSC) between 2012 and 2027.

- 4.10 In this context 424 new homes were completed between 2012 and 2016 across all 10 KSCs leaving a minimum requirement of 326 new homes to be built in the remaining eleven years of the plan period. With regards to Debenham, 48 new homes were built between 2012 and 2016 and there were permissions for a further 73 new homes in the Debenham in 2016 making a total of 121 homes completed. Assuming an equal split in terms of housing numbers between these 10 KSCs. This evidence suggests that, based on the 2012 Core Strategy Focused Review, Debenham has exceeded its requirement of 32 homes and there is therefore no requirement to find sites in the village to meet the Core Strategy 2027 targets.
- 4.11 Given that the Neighbourhood Plan is planning through to 2036, there is however a need to make provision for a further nine years over and above the Core Strategy projection. At this stage, it is not known what the emerging local plan has not published any evidence on housing needs of the district over this period. However, the Babergh and Mid Suffolk Joint Local Plan consultation document (August 2017) stated that a total of 9,951 homes would be needed across the district between 2014 and 2036. The options for the distribution of that growth were for the Core Villages (of which Debenham is one), to receive between 15% and 30% of that planned growth.
- 4.12 Without a preferred option being chosen at this time, it is not possible to identify a specific amount of growth for Debenham based on the Local Plan options. However, a proportional distribution of this growth to the Core Villages, based on the current population, would result in a requirement of between 84 and 167 homes in Debenham between 2014 and 2036.
- 4.13 Debenham Parish Council has therefore been in discussion with Mid Suffolk District Council to ascertain a suitable housing target for the DNP area. Based on the evidence outlined above, and the discussions with Mid Suffolk District Council, it has been considered that 84 homes may need to be built in the period 2016-2036. Debenham Parish Council recognise that this number could change in the future and that housing can have important sustainability benefits the area. Therefore based on their discussion with the District Council, a final target of up to 264 homes has been included with the Neighbourhood Plan, including an allowance for 54 homes to come forward through windfall development, therefore bringing the total homes to be delivered within the DNP area over the Neighbourhood Plan period to up to 318 homes.

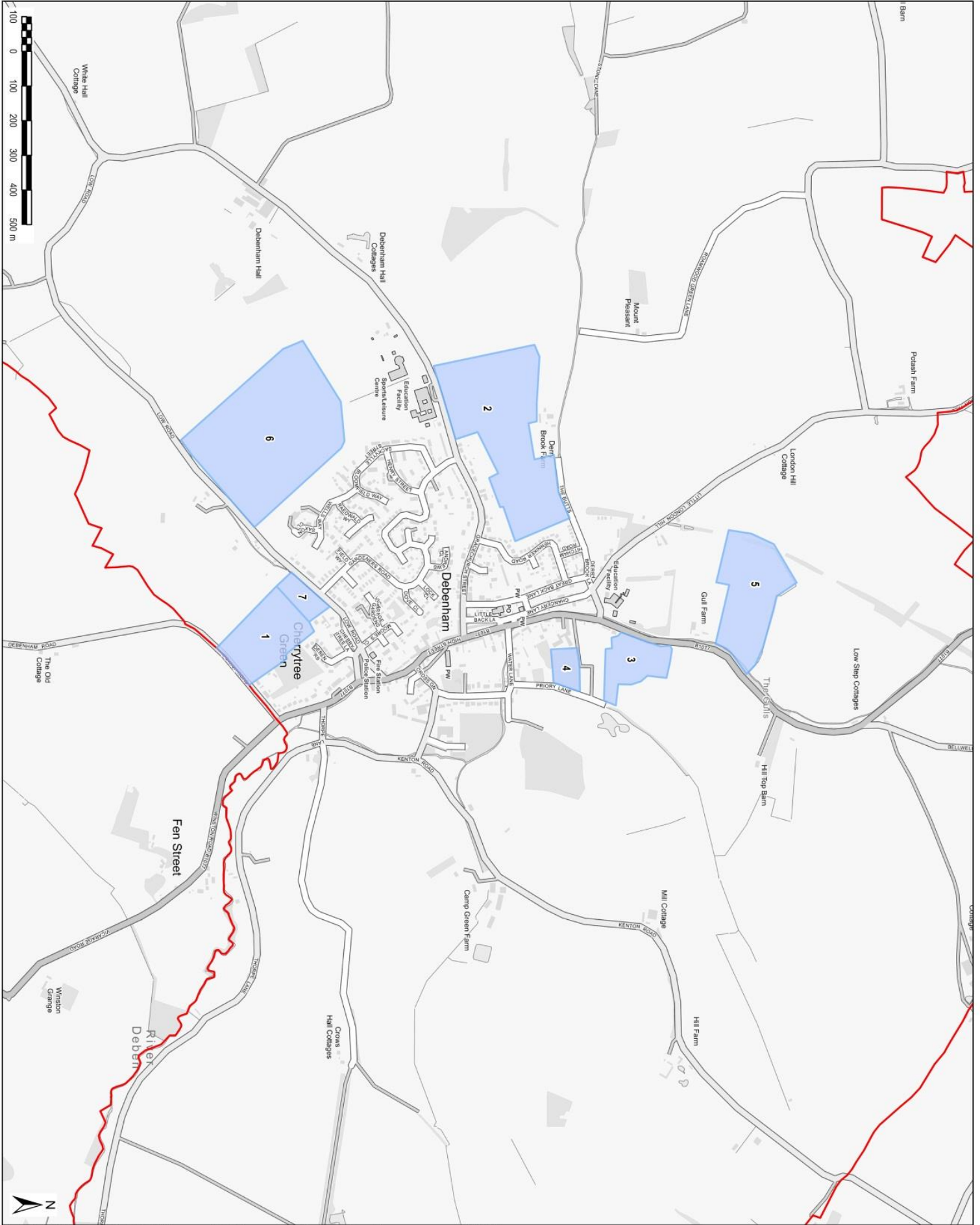
Assessment of alternative sites for taking forward through the DNP

- 4.14 In May 2016, Mid Suffolk District Council published its Draft Strategic Housing Land Availability Assessment (SHLAA) as part of the process to identify potential land availability across the district for housing development. Three sites in Debenham were identified through the Local Plan call for sites process.
- 4.15 Following advice from Mid Suffolk District Council, in July 2017, the Parish Council resolved to undertake its own assessment of sites available in the Neighbourhood Plan area. A Local Plan call for sites was undertaken through a Public Sites Submission (PSS, April 2017) exercise, and seven sites were identified. The locations of these sites are presented in Figure 4.1.
- 4.16 The sites were then considered by the Neighbourhood Plan Steering Group as potential locations for housing allocations to be taken forward for the purposes of the Neighbourhood Plan. Financial assistance was sought from Locality, and AECOM was commissioned to undertake an independent and objective site assessment of the seven sites.
- 4.17 To support the consideration of the suitability of these sites, the SEA process also undertook an appraisal of the key environmental constraints present at each of the sites and potential effects that may arise as a result of housing development at these locations. In this context the sites have been considered in relation to the SEA Framework of objectives and decision making questions developed during SEA scoping (Table 3.2). Table 4.1 provides an overview of the sites presented in Figure 4.1. Tables 4.2 to 4.8 then present a summary of the appraisal of each, and provide an indication of each site's sustainability performance in relation to the seven SEA themes.

Table 4.1 Sites considered for the Debenham Neighbourhood Plan

AECOM site Ref	PSS site Ref.	Location/description	Site area (ha)⁶	Status in the SHLAA	Current land use
1	SS0031	Land north of Ipswich Road	4	Accepted- reference DEB01	Agricultural
2	SS0267	Land north of Gracechurch Street	11.6	Partially accepted- reference DEB(NS)02	Agricultural
3	SS0268	Land east of Aspell Road (opposite primary school)	2.5	Accepted- reference DEB(NS)03	Agricultural
4	SS0364	Land west of Priory Lane	0.74	Not assessed	Woodland
5	SS0588	Land north of Gull Farm	5.53	Not assessed	Agricultural
6	SS0642	Land north of Low Road	13.5	Not assessed	Agricultural
7	SS0902	Land south of Low Road	1.0	Not assessed	Agricultural

⁶ AECOM measurement



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LEGEND

- Debenham Neighbourhood Plan Area
- Site Considered for SEA
- Site 1 Land north of Low Road
- Site 2 Land north of Ipswich Road
- Site 3 Land south of Low Road
- Site 4 Land north of Gracechurch Street
- Site 5 Land west of Priory Lane
- Site 6 Land east of Asgall Road
- Site 7 Land north of Gull Farm

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Proprietor of Issue
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Client
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Project Title
DEBENHAM NEIGHBOURHOOD PLAN

Drawing Title
SITES CONSIDERED FOR THE SEA OF THE DEBENHAM NEIGHBOURHOOD PLAN

Drawn	Checked	Approved	Date
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Revision No. 01

AECOM

Table 4.1: Site assessment for Land North of Ipswich Road (Site 1)

SEA theme	Commentary, Site	
Climate Change	In terms of climate change adaptation this site is not located within Flood Zone 2 or Flood Zone 3. It is also within walking distance of village centre facilities via Low Road; as such it performs relatively well with regards to minimising greenhouse gas emissions as its location is likely to encourage walking and cycling to access the village centre and limit private vehicle use.	
Landscape and historic environment	The Grade II listed Cherry Tree Farmhouse is located 40m from the north east of the site boundary, with the Grade II listed Cherry Tree Inn located c.100m to the north east. The site is however well screened by existing vegetation and developed areas from these assets. Given its location, the site is unlikely to have impacts on the setting of the Debenham Conservation Area. The site is a relatively elevated position and adjoins existing development on one side with views out to the south west and south east, and as such it may have minor effects on landscape.	
Land, soil and water resources	The site is located on grade 3 agricultural land. Readily available data does not differentiate as to whether this grade 3 (lower quality agricultural land) or grade 3a (e.g. the best and most versatile agricultural land) or grade 3b (land not classified as such). However development of this will result in the irreversible loss of this agricultural land and therefore will result in negative effects. Due to the greenfield nature of the site there is no evidence to suggest ground contamination of this site.	
Population and community	The site is within walking distance of the village centre (approximately 800m to key services and facilities within the village. The access to these may be improved further through the provision of walking or cycle path links as part of development.	
Health and wellbeing	The site is within walking distance of the village centre (approximately 800m to key services and facilities within the village. The size of the site offers opportunities for green infrastructure enhancements.	
Transportation	The site is located within walking and cycling distance of the village centre, but car access would be less direct if provided only to Ipswich Road to south. However, there is limited potential for car access via Low Road to the north due to the narrow width of this route and very limited potential for widening due to the presence of existing properties.	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.3: Site assessment for Land north of Gracechurch Street (Site 2)

SEA theme	Commentary, Site	
Climate Change	<p>Access to the site from the north (via the Butts) is located within an area of Flood Zone 2 and 3 associated with the River Deben. In line with the predicted effects of climate change, the flood risk in this location is likely to increase further in the future. However it should be noted that this area of flood risk does not affect a significant part of the site itself.</p> <p>This site is within walking distance of village centre facilities (660m). As such it performs relatively well with regards to minimising greenhouse gas emissions as it likely to encourage the use of alternative modes of transport to the private car to reach the village centre.</p>	
Landscape and historic environment	<p>There are no heritage constraints in immediate vicinity of the site. However, with consideration to the size of the site (11.6Ha), the open, elevated and visible nature of the site would have a significant negative impact on surrounding landscape character and villagescape.</p>	
Land, soil and water resources	<p>The site is located on grade 3 agricultural land. Readily available data does not differentiate as to whether this grade 3 (lower quality agricultural land) or grade 3a (e.g. the best and most versatile agricultural land) or grade 3b (land not classified as such). However development of this will result in the irreversible loss of this agricultural land and therefore will result in negative effects.</p> <p>There is no evidence to suggest ground contamination of this site.</p>	
Population and community	<p>The site is within walking distance of the village centre (approximately 600m), including the village's key services and facilities. Given its size, the site has significant potential to deliver a range of housing types and tenures, and also offer new infrastructure provision through community contributions.</p>	
Health and wellbeing	<p>The site is within walking distance of the village centre (approximately 600m) to key services and facilities within the village. Given the size of the site, an allocation offers significant opportunities for new green infrastructure provision or pedestrian and cycle links as part of new development. There is however limited potential to provide an improved, safe pedestrian access on the northern side of the eastern section of Gracechurch Street due to the narrow nature of the highway and the presence of existing properties.</p>	
Transportation	<p>Given the size of the site, significant traffic impacts have the potential to occur as a result of an allocation at this location. This includes at the existing bottleneck on Gracechurch Street towards its junction with the High Street.</p> <p>An allocation of this size offers opportunities for new pedestrian and cycle links as part of new development.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.4: Site assessment for Land east of Aspoll Road (opposite primary school) (Site 3)

SEA theme	Commentary, Site	
Climate Change	<p>Regarding climate change adaptation, access to the site from the west (Aspoll Road) is located within Flood Zones 2 and 3. In line with the predicted effects of climate change, the flood risk in this location is likely to increase further in the future. However it should be noted that this area of flood risk does not affect a significant part of the site itself.</p> <p>This site is within walking distance of village centre facilities (550m); as such it performs relatively well with regards to minimising greenhouse gas emissions as it likely to encourage walking and cycling to access the village centre and limit private vehicle use.</p>	
Landscape and historic environment	<p>The site is within 50m of the Grade II listed Debenham House and Grade II listed 50 Aspoll Road. These are within the Debenham Conservation Area.</p> <p>However these assets are relatively well screened from the site by trees and an existing building. New development at this location would however be required to have due regard to the historic environment.</p> <p>With regards to impacts on the surrounding landscape the site is very visible from Aspoll Road. However, Aspoll Road is on floor of small valley, minimising the site’s wider visibility, including from the remaining village. As such impacts wider landscape character are not likely to be significant.</p>	
Land, soil and water resources	<p>The site is located on grade 3 agricultural land. Readily available data does not differentiate as to whether this grade 3 (lower quality agricultural land) or grade 3a (e.g. the best and most versatile agricultural land) or grade 3b (land not classified as such. However development of this will result in the irreversible loss of this agricultural land and therefore will result in negative effects.</p> <p>There is no evidence to suggest ground contamination of this site.</p>	
Population and community	<p>The site is within walking distance of the village centre (approximately 550m to key services and facilities within the village. This will support accessibility to village amenities.</p>	
Health and wellbeing	<p>The site is within walking distance of the village centre (approximately 550m to key services and facilities within the village. The size of the site offers opportunities for green infrastructure enhancements.</p>	
Transportation	<p>The site has generally good access to village centre services and facilities.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.5: Site assessment for Land west of Priory Lane (Site 4)



SEA theme	Commentary, Site	
Climate Change	Regarding climate change adaption, this site is not located within flood zone 2 or flood zone 3. However, the development of site would result in the loss of woodland of which the site is currently comprised. With regards to both climate change mitigation and adaptation this will result in a negative effect as woodland is both an important store of carbon and can also help to reduce surface water runoff rates, which can help to mitigate the effect of extreme rainfall events (which are predicted to increase in the future in line with climate change).	
Landscape and historic environment	There are no heritage assets likely to be affected by the development of this site, and the site is not within the setting of the conservation area. However the loss of woodland as part of the development of the site would result in significant negative effects on the site's visual amenity value. As such, it is considered that development of this site would have a significant effect on villagescape character.	
Land, soil and water resources	Woodland can have important beneficial effects for local soil quality by slowing down surface water runoff and preventing soil erosion. In turn this helps to reduce diffuse pollution of nearby surface water bodies. As such development of this site is likely to have negative effects for both water resources and soil quality.	
Population and community	The site has limited social and community value due to a lack of public access. However it has significant visual amenity value as woodland from the footpath along eastern side of the site.	
Health and wellbeing	The site has limited social and community value due to a lack of public access. However it has significant visual amenity value as woodland from the footpath along eastern side of the site.	
Transportation	The site is located within 500m of the village centre. Due to its relative proximity to key services and facilities, development at this location would facilitate and encourage walking and cycling as an alternative to the private car.	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.6: Site assessment for Land north of Gull Farm (Site 5)



SEA theme	Commentary, Site	
Climate Change	<p>Regarding climate change adaptation, access to the site from the east (Aspall Road) is located within Flood Zones 2 and 3. In line with the predicted effects of climate change, the flood risk in this location is likely to increase further in the future. However it should be noted that this area of flood risk does not affect a significant part of the site itself.</p> <p>The site is located further away than a number of the other sites (c.950m). As such, relative to other sites it performs less well with regards to climate change mitigation as it may be more likely to result in residents travelling by car to village services.</p>	
Landscape and historic environment	<p>The site is located 30 meters from Grade II listed Gull Farmhouse and the Grade II listed barn. Although development may not necessarily be detrimental to the setting and character of heritage assets, it is considered that due to the proximity of this listed building and the size of the site (5.5Ha) there may be negative effects during construction which may continue into the use period the site unless specific mitigation measures are developed as part of any development proposals.</p> <p>In terms of landscape considerations it is considered that the site has the potential to lead significant effects on landscape and villagescape character as it is detached from the built up area of the village and has visibility from Aspall Road.</p>	
Land, soil and water resources	<p>The site is located on grade 3 agricultural land. Readily available data does not differentiate as to whether this grade 3 (lower quality agricultural land) or grade 3a (e.g. the best and most versatile agricultural land) or grade 3b (land not classified as such). However development of this will result in the irreversible loss of this agricultural land and therefore will result in negative effects.</p> <p>There is no evidence to suggest ground contamination of this site.</p>	
Population and community	<p>Relative to the other sites, this location is less accessible to the services and facilities of Debenham. Walking and cycling to village centre services and facilities would be complicated by lack of pavement or cycleway along Aspall Road. As such, this will limit accessibility for those without access to a car such as the young and elderly, with associated safety issues. Development of the site is also likely to contribute to car reliance.</p>	
Health and wellbeing	<p>Relative to the other sites, this location is less accessible. Walking and cycling to village centre services and facilities would be complicated by lack of pavement or cycleway along Aspall Road. As such, this may create safety issues for those accessing the site or village centre (especially children) and it may also create a reliance on private car use.</p>	
Transportation	<p>Relative to the other sites, this location is located at some distance (c.950m) to village amenities. Walking and cycling to village centre services and facilities would be complicated by lack of pavement or cycleway along Aspall Road.</p> <p>Given these issues, development at this location may encourage and increased level of car reliance.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.7: Site assessment for Land north of Low Road (Site 6)





SEA theme	Commentary, Site	
Climate Change	<p>Regarding climate change adaptation, access to the site from the south (Low Road) is located within Flood Zones 2 and 3. In line with the predicted effects of climate change, the flood risk in this location is likely to increase further in the future. However it should be noted that this area of flood risk does not affect a significant part of the site itself.</p> <p>This site is within walking distance of village centre facilities (600m); as such it performs relatively well with regards to minimising greenhouse gas emissions as it likely to encourage walking and cycling to access the village centre and limit private vehicle use.</p>	
Landscape and historic environment	<p>The grade II listed Malting Farmhouse is located 30m from the south east site boundary across Low Road. Development at this location will therefore affect its setting.</p> <p>In terms of visual impact, the scale of the site (13.5Ha) has the potential to result in significant negative effect to local landscape character.</p>	
Land, soil and water resources	<p>The site is located on grade 3 agricultural land. Readily available data does not differentiate as to whether this grade 3 (lower quality agricultural land) or grade 3a (e.g. the best and most versatile agricultural land) or grade 3b (land not classified as such). However development of this will result in the irreversible loss of this agricultural land and therefore will result in negative effects.</p> <p>There is no evidence to suggest ground contamination of this site.</p>	
Population and community	<p>This site is over 1km from the key services and facilities located in the village centre. As such, relative to the other sites, this location is less accessible to pedestrians and may encourage a reliance on private car use. This may have negative effect for those without access to a private car, including the young and elderly.</p>	
Health and wellbeing	<p>This site is located over 1km from the key services and facilities within the village centre. As such, relative to the other sites, this location is less accessible to pedestrians and may encourage a reliance on private car use. This may have negative effects on health and wellbeing.</p>	
Transportation	<p>A key issue relating to this site relates to potential impacts on traffic congestion at the existing bottleneck on Low Road. Alternative access arrangements to the north would have similar impacts at the Gracechurch Street bottleneck.</p> <p>This site is over 1km from the key services and facilities located in the village centre. This would encourage car use.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect 
Neutral/no effect		Uncertain effects 

Table 4.8: Site assessment for Land south of Low Road (Site 7)

SEA theme	Commentary, Site	
Climate Change	<p>With regard to climate change adaptation, access to the site from the north (Low Road) is located within Flood Zones 2 and 3. In line with the predicted effects of climate change, the flood risk in this location is likely to increase further in the future. However it should be noted that this area of flood risk does not affect a significant part of the site itself.</p> <p>The site is within walking distance of village centre facilities via Low Road; as such it performs relatively well with regards to minimising greenhouse gas emissions as it likely to encourage walking and cycling to access the village centre and limit private vehicle use.</p>	
Landscape and historic environment	<p>The Grade II listed Cherry Tree Farmhouse is located 30m from the north east of the site boundary. The site is however well screened by existing vegetation and developed areas from these assets. Given its location, the site is unlikely to have impacts on the setting of the Debenham Conservation Area.</p> <p>Given the relatively small size of the site (1ha) is considered that with suitable mitigation the effect on the heritage assets from development of this site is likely to be negligible.</p> <p>In terms of potential impacts on landscape character, the site is limited in size, is located on the south side/floor of a small valley and is surrounded by existing development on two sides. As such thus visual impacts are considered negligible.</p>	
Land, soil and water resources	<p>The site is located on grade 3 agricultural land. Readily available data does not differentiate as to whether this grade 3 (lower quality agricultural land) or grade 3a (e.g. the best and most versatile agricultural land) or grade 3b (land not classified as such). However development of this will result in the irreversible loss of this agricultural land and therefore will result in negative effects.</p> <p>There is no evidence to suggest ground contamination of this site.</p>	
Population and community	<p>The site is within walking distance of the village centre (approximately 640m to the key services and facilities within the village). This will support accessibility to village amenities.</p>	
Health and wellbeing	<p>The site is within walking distance of the village centre (approximately 640m to key services and facilities within the village). This is likely to encourage active travel methods which can have significant health and wellbeing benefits.</p>	
Transportation	<p>The site is located within 640m of the village centre. Due to its relative proximity to key services and facilities, development at this location would facilitate and encourage walking and cycling as an alternative to the private car.</p> <p>A potential issue relating to this site relates to potential impacts on traffic congestion at the existing bottleneck on Low Road. However the site's capacity would limit potential effects.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Current approach taken forward through the Neighbourhood Plan

4.18 The current version of the Neighbourhood Plan allocates three sites for housing, as follows:

- SS0031 Land north of Ipswich Road
- SS0268 Land east of Aspoll Road (opposite primary school)
- SS0902 Land south of Low Road

4.19 This was in response to:

- the requirement for Debenham's Neighbourhood Plan to conform to National Planning Guidance and the emerging policies in MSDC 's emerging Joint Local Plan;
- MSDC's desktop analysis of the Debenham sites;
- the findings of the independent and objective site assessment undertaken for the Neighbourhood Plan;
- the findings of the SEA process; and
- the views, concerns and aspirations of local residents as expressed in their feedback during consultation undertaken for the Neighbourhood Plan. This in particular related to residents' aspirations for new development to retain and add to the character of the village, and concerns relating to inadequate infrastructure, flooding and traffic bottlenecks.

Development of Neighbourhood Plan policies

4.20 To support the implementation of the vision for the Neighbourhood Plan discussed in Section 2.8, the current version of the DNP puts forward 23 policies to guide development in the Neighbourhood Plan area.

4.21 The policies, which were developed following extensive community consultation and evidence gathering, are as follows:

Table 4.2: Debenham Neighbourhood Plan policies

Policy number	Policy title
DEB 1	Growth
DEB 2	Appropriate Housing
DEB 3	Allocation of site north of Ipswich Road for development
DEB 4	Allocation of site south of Low Road for development
DEB 5	Allocation of site east of Aspoll Road opposite Primary School
DEB 6	Consultation with the Parish Council
DEB 7	Sustainability
DEB 8	Housing Mix
DEB 9	Residential Car Parking
DEB 10	Lifetime Homes
DEB 11	Traffic flows and non-residential car parking
DEB 12	Non-motorised networks
DEB 13	Supporting Financial Sustainability
DEB 14	Employment
DEB 15	Broadband
DEB 16	Debenham's Retail Core
DEB 17	Landscaping
DEB 18	Green Spaces
DEB 19	Gardens
DEB 20	Public Realm
DEB 21	Conservation
DEB 22	Views
DEB 23	Nature Conservation
DEB 24	Financial Contributions

5. What are the assessment findings at the current stage?

Introduction

- 5.1 The aim of this chapter is to present assessment findings and recommendations in relation to the current Submission version of the DNP. Section 6 subsequently discusses overall conclusions at this current stage.

Approach to the assessment

- 5.2 The assessment is structured under the six SEA themes scoped into the assessment.
- 5.3 For each theme 'significant effects' of the current version of the DNP on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.
- 5.4 Every effort is made to identify/evaluate effects accurately; however, this is inherently challenging given the high level nature of the DNP. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and to ensure that all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

Climate Change

- 5.5 The DNP contains a number of policies which have direct relevance to climate change considerations. The assessment of the DNP's performance with regard to climate change is outlined below, with discussions on the Neighbourhood Plan's performance with regard to both climate change mitigation and climate change adaptation.

Climate change mitigation

- 5.6 New development taken forward through the Neighbourhood Plan has the potential to lead to overall increases in greenhouse gas emissions over the plan period. In this context the delivery of between 112 and 262 dwellings is likely to lead to an overall increase in emissions through increasing the built footprint of the village.
- 5.7 Climate change mitigation is likely to be undermined by any net increase in greenhouse gas emissions in the DNP area over the lifetime of the plan. In this context, the DNP allocates land for housing development through Policies DEB 3 (Allocation of Site North of Ipswich Road for Development), DEB 4 (Allocation of Site South of Low Road for Development), and DEB 5 (Allocation of Site East of Aspall Road Opposite Primary School). These housing allocations have the potential to increase greenhouse gas emissions in the DNP area, either directly through construction, or indirectly through increases in population and associated travel and consumption behaviours.
- 5.8 It is however important to note that in the absence of the Neighbourhood Plan, development is likely to still occur in the Neighbourhood Plan area and that the allocation of these sites through the DNP is unlikely to alter overall climate change mitigation outcomes in this respect. As such the extent to which the Neighbourhood Plan seeks to implement policies which will limit greenhouse gas emissions per capita is a key consideration.
- 5.9 In this context the allocations delivered through the Neighbourhood Plan are all in locations which are accessible by foot to the services and facilities in the village. This will be further

supported by Policy DEB 2 (Appropriate Housing), which seeks to ensure that new housing provision incorporates high quality pedestrian and cycle routes within, to and from development areas and ensure adequate links exist or can be provided into the village centre and local school. Additionally, Policy DEB 12 (Non-Motorised Networks) provides protection to existing footpath and bridleways in the Neighbourhood Plan area. These policies will help encourage alternative modes of transport to the private car, helping to limit emissions from transport.

- 5.10 More broadly in relation to climate change mitigation, the DNP also has a number of further policies which will help support a limitation of greenhouse gas emissions per capita. For example Policy DEB 7 (Sustainability) requires development proposals to include principles of a sustainable level of design and construction and optimise energy efficiency. In this regard, it does not go as far as to set specific energy efficiency standards for new development. However, it should be noted that the scope to set standards for residential building performance was radically curtailed by the Government's Housing Standards Review. In this context, the Ministerial Statement published on 25th March 2015 outlined the Government's new national planning policy on the setting of technical standards for new dwellings and Local Plan making. The Code for Sustainable Homes was formally withdrawn so targets against this can no longer be set in policy, and local authorities are no longer able to require higher standards as a planning condition for new approvals. In addition to this, the Deregulation Act also brought in a Clause which amended the Planning and Energy Act 2008 to prevent local authorities from requiring higher levels of energy efficiency than existing Building Regulations. Consequently, the lack of such targets within the DNP should be seen within the context of national policy taken by the Government.

Climate change adaptation

- 5.11 The East Suffolk Catchment Flood Risk Management Plan highlights that there are currently 132 properties at risk from a 1% annual probability river flood in Debenham, with 100 properties at risk from a 10% annual probability river flood. Climate change has the potential to increase the occurrence of extreme weather events in the DNP area, and in particular the severity and extent of flood risk is likely to increase. Whilst it is notable that flood risk considerations are not directly covered by policies within the DNP, it is acknowledged that the provisions of the NPPF, national policy and Local Plan policies will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented.
- 5.12 Enhancements to green infrastructure networks promote climate change mitigation through supporting carbon sequestration and promoting walking and cycling, and climate change adaptation through helping to limit the effects of extreme weather events and regulating surface water run-off. This is acknowledged by the NPPF, which recognises that well planned green infrastructure can help an area adapt to, and manage the risks of climate change (including flood risk). Reflecting this, Policy DEB 23 (Nature Conservation) states that "*New developments should retain features of high nature conservation or landscape value, including mature trees, species-rich hedgerows, ponds and existing areas of woodland. Improvement of the connectivity between wildlife areas and green spaces will be encouraged to enhance the green infrastructure of the Parish*". This policy should therefore have a positive effect on climate change adaptation by enhancing green infrastructure networks in the Neighbourhood Plan area. This will also help increase the resilience of biodiversity in the Neighbourhood Plan area to the effects of climate change by enhancing ecological networks locally.

Landscape and Historic Environment

- 5.13 The Neighbourhood Plan area has a rich historic environment. This includes 93 listed buildings, incorporating one Grade I, seven Grade II* and a further 85 Grade II listed buildings. The Debenham Conservation Area covers the core of Debenham Village. There are also 230 archaeological records listed on the Suffolk Historic Environment Record. These finds are primarily comprised of Roman and Medieval pottery along with a number of Neolithic sites.
- 5.14 New development has the potential to lead to both adverse and beneficial effects on landscape and the historic environment, including through affecting the setting of cultural heritage assets and villagescape quality. Whilst there are no areas designated for their landscape character

(such as Areas of Outstanding Natural Beauty) within the DNP area, local landscape character is of key importance to local people. As such the DNP puts in place policies which aim to enhance and conserve the landscape character of the Neighbourhood Plan area.

- 5.15 For instance, Policy DEB 2 (Appropriate Housing) places a requirement on development to conserve these elements by stating that: *“All new housing developments should take account of, and respect, the special landscape and built character of the village”*. Policy DEB 17 (Landscaping) places a requirement on new development to provide landscaping between new and existing development, and the policy states that the design of new development close to the edge of the village should seek to preserve the character of the adjacent countryside and greenspaces. Policy DEB 22 (Views) also seeks to ensure new development responds and protects a number of key views in the Neighbourhood Plan area. These policies will be further supported by Policy DEB 18 (Green Spaces), DEB 19 (Gardens) and DEB20 (Public Realm). These policies will all contribute to protecting and enhancing the quality of the public realm and built and natural environment, and support local distinctiveness. In addition these policies will help to minimise the impact of new development on landscape and villagescape character in the Neighbourhood Plan area.
- 5.16 The DNP also directly presents provisions for the conservation and enhancement of the Neighbourhood Plan area’s rich historic environment. Of particular note is policy DEB 21 (Conservation) which sets out a range of requirements which proposals are expected to meet. This includes relating to: the protection of key views and streetscapes; the conservation and enhancement of key heritage features and their settings; initiating appropriate scale, form, height, massing, alignment of new development; and seeking to preclude any works that would lead to harm or substantial harm to a heritage asset without sufficient justification.
- 5.17 In this context, the DNP sets out a range of provisions which will have the potential to lead to significant positive effects in relation to this SEA theme.

Land, Soil, and Water Resources

- 5.18 A number of the DNP policies allocate land for development. These include policies DEB 3 (Allocation of site north of Ipswich Road for development), DEB 4 (Allocation of site South of Low Road for Development), and DEB 5 (Allocation of Site East of Aspoll Road Opposite Primary School). This will lead to the loss of productive agricultural land, classified as Grade 3 agricultural land by the pre 1988 provisional Agricultural Land Quality dataset. Given that recent agricultural land classification has not been carried out, it is uncertain whether this comprises land classified as Grade 3a land (i.e. land classified as the best and most versatile agricultural land) or Grade 3b land (land which is not classified as such). As such, although the allocations set out by these policies are likely to have negative effects in relation to land and soil resources, it is uncertain as to what the significance of these losses will be.
- 5.19 Regarding water resources, the River Deben flows through the DNP area and in 2016 the overall water quality for the Deben (upstream of Brandeston Bridge) was evaluated as being ‘heavily modified’ and as being of ‘moderate’ overall water quality. In this regard, policies which support the conservation of natural features such as grassland, woodland and hedge cover are likely to enhance the quality of water resources (and also land resources) through promoting the ability of natural processes to support soil and water quality. For example, tree cover will help to prevent soil erosion and minimise surface water runoff compared to impermeable surfaces such as tarmac. Recognising this, the DNP presents a number of policies which pertain to conserving and encouraging new planting of natural habitats. For instance, Policy DEB 17 (Landscaping) requires that development should provide appropriate landscaping, open areas and tree planting and also that developers should include buffer planting between new and existing developments. DEB 18 (Green Spaces) designates a number of locations as local green spaces, and sets out that proposals for any development on such sites will be resisted unless under special circumstances. DEB 23 (Nature Conservation) seeks to ensure that new development retains features of high nature conservation or landscape value, including mature trees, species-rich hedgerows, ponds and existing areas of woodland and also goes further to encourage enhancement of green infrastructure networks in the parish.

- 5.20 Combined, these policies should help to limit the proportion of the DNP area which is covered by impermeable surfaces such as concrete and help to regulate surface water run-off and reduce soil erosion. This should also have positive associated effects in terms of limiting the potential for groundwater contamination, which is an important element given that a Zone 3 Source Protection Zone underlays much of the Neighbourhood Plan area.

Population and Community

- 5.21 The SEA scoping report compiled a range of data related to the population and community of the DNP area. It highlighted that the population of Debenham increased at a faster rate between 2001 and 2011 than the increases observed for Mid Suffolk, East England or England as a whole across the same period. Furthermore the evidence shows that a higher proportion of residents are within the 60+ age category in the DNP area (20.90%) in comparison to the percentages for Mid Suffolk, the East of England and the national average. This higher than national average growth in population, combined with an identified larger proportion of older people suggests that there may be increased pressure on community and health facilities and services now and into the future. Conversely, the DNP area generally experiences very low levels of deprivation, with the LSOA being within the least 10% to least 30% most deprived neighbourhoods in the country amongst the majority of deprivation indices.
- 5.22 In this context the DNP has a range of policies which are likely to both directly and indirectly bring benefits to the quality of life for residents in Debenham. In relation to housing provision, the Neighbourhood Plan allocates three sites for housing, with a provision totalling in the region of between 112 and 262 dwellings. As this is anticipated to exceed the requirements of the Local Plan, it is assumed that this growth quantum will meet the objectively assessed housing needs arising locally. The location of the allocated sites is also considered to be sustainable due their proximity to the services, facilities and public transport links in Debenham village centre.
- 5.23 Policy DEB 2 (Appropriate Housing) has provisions in place to ensure that a number of key design principles are met for any development which relate to elements relating to density, scale, landscape and character setting, and Policy DEB 7 (Sustainability) requires development proposals to include principles of a sustainable level of design and construction and optimise energy efficiency. This will support the quality of new housing. Policy DEB 8 (Housing Mix) requires that development must contribute towards the existing and future needs of the village through creating a mix in the size and type of housing, with a particular emphasis on young people requiring 2 or 3 bedroom homes. This help deliver housing which reflects local needs, and support a balancing of the age structure within the Neighbourhood Plan area.
- 5.24 There is now robust evidence that access to the natural environment improves people's quality of life through encouraging healthy outdoor recreation and relaxation. In this context, a number of policies within the Neighbourhood Plan aim to protect and enhance the accessibility to open spaces and facilitate green infrastructure enhancements. This includes Policy DEB 18 (Green Spaces), DEB 19 (Gardens) and DEB20 (Public Realm), which have a close focus on enhancing green infrastructure networks in the Neighbourhood Plan area. This includes through the designation of a number of green spaces of existing value to the community as Local Green Spaces. In addition, these policies will contribute to protecting and enhancing the quality of the public realm and built and natural environment, and support local distinctiveness. This will help increase the satisfaction of residents with their neighbourhood as a place to live.
- 5.25 A key contributor to the quality of life of residents is accessibility to services and facilities. This has been discussed under the 'Transportation' SEA theme below.

Health and Wellbeing

- 5.26 Health and wellbeing levels within the Neighbourhood Plan area are generally good in comparison to the regional and national context. However, the proportion of residents in the DNP area who consider themselves as having 'very good' health or 'good' health is marginally lower than that seen in Mid Suffolk, the East of England and England. Conversely, and as would be expected, the total percentage of residents in the DNP area who report either 'bad

health' or 'very bad health' is lower than the regional total and national total but is slightly higher than the total for Mid Suffolk. Generally the level of disability in the DNP area is lower than that seen in East England and England, but marginally higher than that for Mid Suffolk.

- 5.27 Although there are no Neighbourhood Plan policies directly relating to health provision, a number are likely to have direct and indirect effects in relation to this SEA theme. For instance, Policy DEB 18 (Green Spaces) designates a number of locations as local greenspace to protect these from development and DEB 20 (Public Realm) requires developments of five or more dwellings to contribute towards suitable open space. Both green and open spaces are important community assets and can provide valuable sites for recreation, exercise and socialising, and as such, are likely to contribute significantly to residents' physical and mental health. Therefore these policies are likely to have medium and long term positive effects in this regard.
- 5.28 The allocations delivered through the Neighbourhood Plan are all in locations which are accessible by foot to the services and facilities in the village. This will be further supported by Policy DEB 2 (Appropriate Housing), which seeks to ensure that new housing provision incorporates high quality pedestrian and cycle routes within, to and from development areas and ensure adequate links exist or can be provided into the village centre and local school. Additionally, Policy DEB 12 (Non-Motorised Networks) provides protection to existing footpath and bridleways in the Neighbourhood Plan area. These policies will help encourage the use of active modes of travel as alternatives to the private car, with associated benefits for physical and mental health and wellbeing.

Transportation

- 5.29 Housing and employment growth in the DNP area will place increasing pressures on transport infrastructure. This is a particular concern for the Neighbourhood Plan area given that public transport options are limited. Reflecting this, census data showed that very few residents walk or cycle to work and that car ownership is very high. Traffic and congestion is also a key community concern.
- 5.30 In response to this, the DNP seeks to implement policies which promote modal shift from the private car and reduce the impact of of traffic on the public realm.
- 5.31 The allocations delivered through the Neighbourhood Plan are all in locations which are accessible by foot to the services and facilities in the village. This will be further supported by Policy DEB 2 (Appropriate Housing), which seeks to ensure that new housing provision incorporates high quality pedestrian and cycle routes within, to and from development areas and ensure adequate links exist or can be provided into the village centre and local school.
- 5.32 Policy DEB 12 (Non-Motorised Networks) highlights that "*existing footpaths and bridleways provide a high level of amenity value and will be protected*" and goes on to state an aspirational aim that all new development should "*take every opportunity to enhance existing networks and provide new networks where appropriate.*" This will be supported by Policy DEB 11 (Traffic Flows and Non-Residential Car Parking), which seeks to ensure that new development proposals effectively consider the potential impact of increases in traffic on pedestrians, cyclists, road safety, parking and congestion within the parish and include measures to mitigate any impacts. Walking and cycling will be further supported by the policies which seek to enhance the public realm (including Policy DEB 18 (Green Spaces), DEB 19 (Gardens) and DEB20 (Public Realm) and improve road safety.
- 5.33 In relation to the latter, Policy DEB 9 (Residential Car Parking) sets out that "*proposals that generate an increased need for parking must provide adequate and suitable off-street parking in order to minimise obstruction of the local road network in the interests of the safety of all road users, including pedestrians and cyclists.*" This policy should help to limit potential impacts from parking on traffic flows and road safety. However, it is considered that it will have a negligible effect with regards to decreasing traffic on roads, reducing congestion or encouraging the uptake of sustainable and active transport methods within the Parish.

- 5.34 Overall however, the Neighbourhood Plan has a strong focus on limiting congestion, enhancing options for walking and cycling in the Neighbourhood Plan area and reducing the need to travel for services and facilities. As such significant positive effects are anticipated as a result of the Neighbourhood Plan in relation to this SEA theme.

Conclusions at this current stage

- 5.35 The assessment has concluded that the current version of the Debenham Neighbourhood Plan is likely to lead to significant positive effects in relation to the 'Population and Community' and 'Health and Wellbeing' SEA themes. These benefits largely relate to the Neighbourhood Plan's focus on delivering housing which meets local needs, and enhancing the quality of life of residents, including through supporting community cohesion and on protecting and enhancing the built and natural environment. In addition, the Neighbourhood Plan has a strong focus on protecting and enhancing villagescape character and the setting of the historic environment, This will lead to significant positive effects in relation to the 'Landscape and Historic Environment' theme.
- 5.36 In relation to the 'Transportation' theme the Neighbourhood Plan has a close focus on limiting the impact of housing growth on congestion in the village, including at key pinchpoints on the road network, and on promoting walking and cycling as an alternative to the private car. This will bring significant positive effects.
- 5.37 The Neighbourhood Plan will also initiate a number of beneficial approaches regarding the 'Climate Change' SEA theme, helping to limit per capita greenhouse gas emissions and support the resilience of the Neighbourhood Plan area to the likely impacts of climate change. However these are not considered to be significant in the context of the SEA process given the scope of the Neighbourhood Plan and the scale of proposals.
- 5.38 In relation to the Land, Soil and Water resources SEA theme, the allocations proposed through the Neighbourhood Plan will lead to a loss of productive agricultural land. However the significance of these negative effects on soils resources is uncertain given that recent detailed agricultural land classification has not been undertaken in the Neighbourhood Plan area.

6. What are the next steps?

- 6.1 This Environmental Report accompanies the Submission version of the Debenham Neighbourhood Plan.
- 6.2 At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the emerging Babergh and Mid Suffolk Joint Local Plan and adopted Mid Suffolk Core Strategy.
- 6.3 If the subsequent Independent Examination is favourable, the DNP will be subject to a referendum, organised by Mid Suffolk District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the DNP will become part of the Development Plan for Debenham Parish.

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Appendix A : Summary of context review and baseline

Air Quality

Policy Context

Key messages from the National Planning Policy Framework (NPPF) include:

- 'Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan'.
- New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.

Published in January 2018 by the UK Government, 'A Green Future: Our 25 Year Plan to Improve the Environment'⁷ sets out a number of goals and policies in order to help the natural world regain and retain good health. In this context, Goal 1 'Clean air' and the policies contained within 'Chapter 4: Increasing resource efficiency, and reducing pollution and waste' within the 25 year plan directly relate to the air quality SEA theme.

In terms of the local context, Policies contained within the Adopted Core Strategy, and those updated by the focussed review, and which relate to Air Quality include Policy CS3 (Reduce contributions to Climate Change).

Current baseline

As of September 2016 the DNP area has no recorded Air Quality Management Areas (AQMAs), and air quality is not automatically monitored anywhere within the DNP area as part of the Air Quality Updating and Screening Assessment process carried out by Mid Suffolk District Council.

Future baseline

New employment and or housing provision within the DNP has the potential to create adverse effects on air quality through increasing traffic flows and associated levels of pollutants such as NO₂, particularly along the main route through the DNP area.

The emerging Joint Local Plan Consultation Document has identified three potential development sites within the DNP area. These have the potential to increase traffic flows in the area both during construction and operation. It is noted though that the implementation of the policies in the Local Transport Plan (discussed in Chapter 9) present opportunities to improve air quality. An increased uptake of low emission vehicles is also likely to have benefits for air quality.

⁷ GOV.UK (2018): 'A Green Future: Our 25 Year Plan to Improve the Environment', [online] available to download via: <<https://www.gov.uk/government/publications/25-year-environment-plan>> last accessed [13/02/2018]

Biodiversity

Policy context

At the European level, the EU Biodiversity Strategy⁸ was adopted in May 2011 in order to deliver an established new Europe-wide target to '*halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020*'.

Key messages from the National Planning Policy Framework (NPPF) include:

- Contribute to the Government's commitment to halt the overall decline in biodiversity by minimising impacts and achieving net gains in biodiversity wherever possible.
- Promote the 'preservation, restoration and re-creation of priority habitats, ecological networks' and the 'protection and recovery of priority species'. Plan for biodiversity at a landscape-scale across local authority boundaries.
- Set criteria based policies for the protection of internationally, nationally and locally designated sites, giving weight to their importance not just individually but as a part of a wider ecological network.
- Take account of the effects of climate change in the long term. Adopt proactive strategies to adaptation and manage risks through adaptation measures including green infrastructure (i.e. 'a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities').
- Plan positively for 'green infrastructure' as part of planning for 'ecological networks'.
- High quality open spaces should be protected or their loss mitigated, unless a lack of need is established
- Goal 3 'Thriving plants and wildlife' and the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Chapter 5 'Securing clean, productive and biologically diverse seas and oceans' within the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment' directly relates to the Biodiversity SEA theme.

The Natural Environment White Paper (NEWP)⁹ sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was in part a response to the UK's failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. It includes commitments to:

- Halt biodiversity loss, support functioning ecosystems and establish coherent ecological networks by 2020;
- Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;
- Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
- Address barriers to using green infrastructure to promote sustainable growth.

Reflecting the commitments within the Natural Environment White Paper and the EU Biodiversity Strategy, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' aims to '*halt*

⁸ European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: <http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP_resolution_april2012.pdf> last accessed 13/02/2018

⁹ Defra (2012) The Natural Choice: securing the value of nature (Natural Environment White Paper) [online] available at: <<http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>> last accessed 13/02/2018

overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people¹⁰.

The recently published 25 Year Environment Plan sets out the Government's environmental plan of action over the next quarter century, in the context of Brexit. The Plan aims to tackle the growing problems of waste and soil degradation, improving social justice through tackling pollution and promoting the mental and physical health benefits of the natural world. It also sets out how the Government will address the effects of climate change. These aims are supported by a range of policies which are focused on the following six key areas:

- Using and managing land sustainably
- Recovering nature and enhancing the beauty of landscapes
- Connecting people with the environment to improve health and wellbeing
- Increasing resource efficiency, and reducing pollution and waste
- Securing clean, productive and biologically diverse seas and oceans
- Protecting and improving the global environment

In terms of the local context, Policies contained within the Adopted Core Strategy, and those updated by the focussed review, and which relate to Biodiversity include:

Policy CS4 (Adapting to Climate Change)

Policy CS5 (Mid Suffolk's Environment)

Current baseline

European designated sites (Ramsar/SPA/SAC)

There are no European designated sites within or in close proximity to the DNP area.

Nationally designated sites (SSSI/NNR)

There are no Sites of Special Scientific Interest (SSSI) located within the DNP area. However, the Mickfield Meadow is located 285 metres from the Western DNP area boundary. The site consists of a small meadow managed on traditional lines and is designated for its species-rich unimproved neutral grassland flora of a type formerly widespread in Suffolk before the advent of modern farming methods. Impact Risk Zones (IRZ) for this SSSI extend into the DNP area. As such, Natural England will need to be consulted on any development within 710 metres of the western boundary of the DNP comprising of 50 or more houses.

There are no National Nature Reserves (NNRs) located within or in proximity to the DNP area.

Locally designated sites (LNR/SINC)

There are no Local Nature Reserves (LNR) or Sites of Importance for Nature Conservation (SINC) currently designated within the DNP area.

Biodiversity Action Plan habitats

Biodiversity Action Plan (BAP) habitats cover a wide range of semi-natural habitat types, and were those that were identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP).

As a result of devolution, and new country-level and international drivers and requirements, much of the work previously carried out by the UK BAP is now focussed at a country-level rather than a UK-level, and the UK BAP was succeeded by the 'UK Post-2010 Biodiversity Framework' in July 2012. The UK list of priority habitats, however, remains an important reference source and has been used to

¹⁰ DEFRA (2011): 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services', [online] Available to download from: <<https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>> last accessed 13/02/2018

help draw up statutory lists of priority habitats in England, as required under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006¹¹.

In this context, the DNP area contains small isolated patches of BAP habitats. These are shown in figure 3.1, and include:

- Coastal and Floodplain Grazing Marsh
- Deciduous Woodland
- Good Quality Semi-improved Grassland
- Lowland Meadows
- Traditional Orchard

Future baseline

Habitats and associated species may potentially face increasing pressures from future development within the Neighbourhood Plan area, which may be exacerbated by the effects of climate change, and has the potential to lead to changes in the distribution and abundance of species and changes to the composition and character of habitats.

The DNP presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species and designated sites at an early stage of planning for future growth. To achieve this it will be important for the DNP to include aims to improve green infrastructure and ecological corridors.

Climate change

Policy context

The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report aiming to understand the current and future climate risks and opportunities. The evidence report contains six priority risk areas requiring additional action in the next five years, see below¹²:

- Flooding and coastal change risks to communities, businesses and infrastructure;
- Risks to health, well-being and productivity from high temperatures;
- Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
- Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
- Risks to domestic and international food production and trade; and
- New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals

Along with policies contained in Chapter 1 'Using and managing land sustainably' and Chapter 6 'Protecting and improving the global environment', Goal 4 'A reduced risk of harm from environmental hazards such as flooding and drought' and Goal 7 'Mitigating and adapting to climate change' of the

¹¹ Joint Nature Conservation Committee (2016) UK BAP Priority Habitats [online] available at: <http://jncc.defra.gov.uk/page-5718>

¹² GOV UK: 'UK Climate Change Risk Assessment Report January 2017', [online] available to download from: <https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017> last accessed 13/02/2018

Government's 'A Green Future: Our 25 Year Plan to Improve the Environment' directly relates to the Climate Change SEA theme.

The UK Climate Change Act¹³ was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement.

The Climate Change Act includes the following:

- The Act commits the UK to reducing emissions by at least 80% in 2050 from 1990 levels.
- Carbon Budgets. The Act requires the Government to set legally binding 'carbon budgets'. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The carbon budgets are designed to reflect the cost-effective path to achieving the UK's long-term objectives. The first five carbon budgets have been put into legislation and run up to 2032.
- The Committee on Climate Change was set up to advise the Government on emissions targets, and report to Parliament on progress made in reducing greenhouse gas emissions. The National Adaptation Programme requires the Government to assess the risks to the UK from climate change, prepare a strategy to address them, and encourage key organisations to do the same. For more detail, visit the UK adaptation policy page¹⁴.

Key messages from the National Planning Policy Framework (NPPF) include:

- Support the transition to a low carbon future in a changing climate as a 'core planning principle'.
- There is a key role for planning in securing radical reductions in greenhouse gas (GhG) emissions, including in terms of meeting the targets set out in the Climate Change Act 2008¹⁵. Specifically, planning policy should support the move to a low carbon future through:
 - Planning for new development in locations and ways which reduce GhG emissions;
 - Actively supporting energy efficiency improvements to existing buildings;
 - Setting local requirements for building's sustainability in a way that is consistent with the Government's zero carbon buildings policy;
 - Positively promoting renewable energy technologies and considering identifying suitable areas for their construction; and
 - Encouraging those transport solutions that support reductions in GhG emissions and reduce congestion.
 - Direct development away from areas highest at risk of flooding, with development 'not to be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding'. Where development is necessary, it should be made safe without increasing levels of flood risk elsewhere.
 - Take account of the effects of climate change in the long term, taking into account a range of factors including flooding. Adopt proactive strategies to adaptation and manage risks through adaptation measures including well planned green infrastructure.

The Flood and Water Management Act¹⁶ highlights that alternatives to traditional engineering approaches to flood risk management include:

- Incorporating greater resilience measures into the design of new buildings, and retro-fitting properties at risk (including historic buildings);

¹³ GOV.UK (2008): 'Climate Change Act 2008', [online] accessible via <<http://www.legislation.gov.uk/ukpga/2008/27/contents>> last accessed 13/02/2018

¹⁴ Committee on Climate Change (2017): 'UK Adaptation Policy' [online] accessible via <<https://www.theccc.org.uk/tackling-climate-change/preparing-for-climate-change/uk-adaptation-policy/>> last accessed 13/02/2018

¹⁵ The Climate Change Act 2008 sets targets for greenhouse gas (GhG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO₂ emissions of at least 26% by 2020, against a 1990 baseline.

¹⁶ Flood and Water Management Act (2010) [online] available at: <http://www.legislation.gov.uk/ukpga/2010/29/contents>

- Utilising the environment in order to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water;
 - Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere;
 - Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
 - Creating sustainable drainage systems (SuDS)¹⁷
- Further guidance is provided in the document 'Planning for SuDS'.¹⁸ This report calls for greater recognition of the multiple benefits that water management can present. It suggests that successful SuDS are capable of 'contributing to local quality of life and green infrastructure'.

In terms of the local context, Policies contained within the Adopted Core Strategy, and those updated by the focussed review, and which relate to Climate Change include:

- Policy CS3 (Reduce contributions to Climate Change)
- Policy CS4 (Adapting to Climate Change)

Current baseline

Contribution to climate change

In relation to GhG emissions, source data from UK local authority and regional carbon dioxide emissions National Statistics suggests that Mid Suffolk has generally had higher per capita emissions total in comparison to the trends and for the South East and England between 2005 and 2012 (see Table 4.1). Mid Suffolk has however seen a 24% reduction in the percentage of total emissions per capita between 2005 and 2012. Although this is lower than the reduction seen for the East of England (32%) it is higher than that for England (22%).

Potential effects of climate change

The outcome of research on the probable effects of climate change in the UK was released in 2009 by the UK Climate Projections (UKCP09) team¹⁹. UKCP09 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

As highlighted by the research, the effects of climate change for the East of England by 2050 for a medium emissions scenario²⁰ are likely to be as follows:

- The central estimate of increase in winter mean temperature is 2.2°C and an increase in summer mean temperature of 2.5°C; and
- The central estimate of change in winter mean precipitation is 14% and summer mean precipitation is –17%.

Resulting from these changes, a range of risks may exist for the Neighbourhood Plan area and wider region. These include:

- Effects on water resources from climate change;
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;
- Increased risk of flooding, including increased vulnerability to 1:100 year floods;

¹⁷ N.B. The provision of Schedule 3 to the Flood and Water Management Act 2010 came into force on the 1st of October 2012 and makes it mandatory for any development in England or Wales to incorporate SuDs.

¹⁸ CIRIA (2010) 'Planning for SuDs – making it happen' [online] available to access via http://www.ciria.org/Resources/Free_publications/Planning_for_SuDS_ma.aspx last accessed 13/02/2018

¹⁹ The data was released on 18th June 2009: See: <http://ukclimateprojections.metoffice.gov.uk/>

²⁰ UK Climate Projections (2009) East of England 2050s Medium Emissions Scenario [online] available at: <http://ukclimateprojections.metoffice.gov.uk/23954?emission=medium>

- A need to increase the capacity of wastewater treatment plants and sewers;
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution;
- Spread of species at the northern edge of their distribution;
- Increased demand for air-conditioning;
- Increased drought and flood related problems such as soil shrinkages and subsidence;
- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads.

Flood risk

Figure 4.1 one shows the extent of Flood Zones within the DNP area. There are three flood zones as defined by the EA; Flood Zone 1, 2 and 3. These areas have been defined following a national scale modelling project for the EA and are regularly updated using recorded flood extents and local detailed modelling.

Areas deemed to be in Flood Zone 1 have been shown to be at less than 0.1% chance of flooding in any year and there are very few restrictions in terms of flood risk to development in these areas. The exception is for development over 1ha in size which must have a flood risk assessment undertaken.

Areas deemed to be in Flood Zone 2 have been shown to have between 0.1% – 1% chance of flooding from rivers in any year or between 0.1% – 0.5% chance of flooding from the sea in any year. Flood Zone 2 development needs to submit a flood risk assessment as part of its planning application which shows the risk of flooding to the site.

Flood Zone 3 is split into two separate zones; 3a and 3b. However this level of detail is not readily available for mapping purposes. As such Figure 4.1 identifies a general Flood Zone 3. Areas within Flood Zone 3 have been established as being at a 1% or greater probability of flooding from rivers or 0.5% or greater probability of flooding from the sea. Flood Zone 3 development needs to submit a flood risk assessment as part of its planning application, which determines if the site is classified as Flood Zone 3a or 3b as well as reviewing flood risk on the site and proposing suitable mitigation.

The East Suffolk Catchment Flood Risk Management Plan²¹ confirms the data visible in Figure 4.1. The Management Plan highlights that Debenham is located in the headwaters of the River Deben and is at risk from flash flooding due to intense rainfall events and rapid run-off, and that currently there are 132 properties at risk from the 1% annual probability river flood. There is also risk from lower magnitude fluvial flooding in this settlement, with 100 properties at risk from the 10% annual probability of fluvial flooding. By 2100, properties at risk from 1% probability flooding is likely to increase to 147, and those at risk from 10% probability flooding will have increased to 133.

The catchment Flood Risk Management Plan also notes that there are no formal flood defences within Debenham. In this context, Debenham Parish Council have stated that fluvial flood risk in the DNP area is currently managed through routine maintenance of the watercourses. However, the benefits of this approach will reduce in the future as flood risk is likely to increase as extreme weather events become more frequent and intense. There is also risk from surface water flooding due to a combination of impermeable surfaces and steep slopes within the built up area of Debenham.

Future baseline

Climate change has the potential to increase the occurrence of extreme weather events in the Neighbourhood Plan area, with increases in mean summer and winter temperatures, increases in mean precipitation in winter and decreases in mean precipitation in summer. This is likely to increase the risks associated with climate change, with an increased need for resilience and adaptation.

In terms of climate change contribution, GhG emissions generated in the Neighbourhood Plan area may continue to decrease with wider adoption of energy efficiency measures, renewable energy

²¹ Environment Agency (2009) East Suffolk Catchment Flood Risk Management Plan [online] available at: <https://www.gov.uk/government/publications/east-suffolk-catchment-flood-management-plan>

production and new technologies. However, increases in the built footprint of the Neighbourhood Plan area would contribute to increases in the absolute levels of GhG emissions.

Landscape and historic environment

Policy context

Key messages from the National Planning Policy Framework (NPPF) include:

- Protect and enhance valued landscapes, giving particular weight to those identified as being of national importance.
- Heritage assets should be recognised as an ‘irreplaceable resource’ that should be conserved in a ‘manner appropriate to their significance’, taking account of ‘the wider social, cultural, economic and environmental benefits’ of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- Set out a ‘positive strategy’ for the ‘conservation and enjoyment of the historic environment’, including those heritage assets that are most at risk.
- Develop ‘robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics’.
- Consider the effects of climate change in the long term, including in terms of landscape. Adopt ‘proactive strategies’ to adaptation and manage risks through adaptation measures including well planned green infrastructure.

Additionally, the National Planning Policy Guidance states that Neighbourhood Plans should include enough information, where relevant, “about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale” and “about local non-designated heritage assets including sites of archaeological interest to guide decisions”.

Along with the policies contained within Chapter 2 ‘Recovering nature and enhancing the beauty of landscapes’, Goal 6 ‘Enhanced beauty, heritage and engagement with the natural environment’ of the Government’s “A Green Future: Our 25 Year Plan to Improve the Environment” directly relates to the Landscape and Historic Environment SEA theme.

The Government’s Statement on the Historic Environment for England²² sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.

In terms of the local context, Policies contained within the Adopted Core Strategy, and those updated by the focussed review, and which relate to Landscape and the Historic Environment include:

- Policy CS2 (Development in the Countryside and Countryside Villages)
- Policy CS5 (Mid Suffolk’s Environment)
- Policy CS6 (Services and Infrastructure)
- Policy CS7 (Brown Field Target)

Current baseline

Landscape

National Character Areas (NCAs) are landscape areas which share similar characteristics, following natural lines in the landscape rather than administrative boundaries. Developed by Natural England, NCA profiles describe the natural and cultural features that shape each of these landscapes, providing a broad context to its character.

²² HM Government (2010) The Government’s Statement on the Historic Environment for England [online] available at: http://webarchive.nationalarchives.gov.uk/http://www.culture.gov.uk/reference_library/publications/6763.aspx last accessed [26/01/18]

The DNP area is located within NCA Profile 83: South Norfolk and High Suffolk Claylands²³, which is defined as a high and predominantly flat clay plateau which is incised by numerous small-scale wooded river valleys with complex slopes that in places are much unexpected for East Anglia. The underlying geology is chalk, which forms the principal aquifer, and shallow marine deposits overlain with glacial till, buried river gravels, lake sediments and bands of glacial outwash deposits.

Updated and revised in 2011, The Suffolk Landscape Character Typology²⁴ highlights that the DNP area has four separate Landscape Typologies present within it. These are:

- Plateau Claylands: This landscape is described as being a Plateau of heavy clay soil which is made up of ancient organic patterns of fields which are gently undulating and dissected by small streams with substantial hedges of hawthorn and dispersed settlements.
- Rolling Valley Claylands: these landscapes are found in the upper reaches of most of the East Suffolk rivers. They are comprised of gently sloping valleys with fields which are often smaller than on the surrounding plateau with ancient woodland present on the upper fringes of the valley sides.
- Ancient Estate Claylands: This is a gently rolling heavy clay plateau with ancient woodlands and parklands with villages dispersed with hamlets and farmsteads.
- Valley Meadowlands: these landscapes are deprived as flat valley floor grasslands on silty and peaty soils with grassland divided by a network of wet ditches and occasional Carr Woodland and plantations of Poplar.

Historic environment

The DNP area has a rich historic environment.

Historic England is the statutory consultee for certain categories of Listed Building consent and all applications for scheduled monument consent. The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms. In this context, the DNP area contains a total of 93 nationally listed buildings. Of this number, one is Grade I, seven are Grade II* and a further 85 are Grade II, which are also protected through the Listed Buildings and Conservation Areas Act 1990. There are no scheduled monuments in the DNP area.

Conservation areas are designated because of their special architectural and historic interest²⁵. Conservation area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and providing a greater understanding and articulation of its character - mentioned within the 'Conservation Area Designation, Appraisal and Management' advice note by Historic England.²⁶ Ideally, appraisals should be regularly reviewed as part of the management of the Conservation Area, and can be developed into a management plan.

In this regard, the Debenham Conservation Area is located within the Neighbourhood Plan area. The Conservation Area Appraisal notes that the Grade I listed Church of St Mary is of key importance to the Historic Environment of Debenham with a late 13th Century chancel and 14th Century tower. Debenham also has a large number of timber frame buildings, seven of which are make up the Grade II* listed buildings in the DNP area. The Appraisal also notes that the many small grassed areas in the village are an important part of Debenham's character.²⁷

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I, Grade II and Grade II* Listed Buildings, Scheduled Monuments, Historic Parks and Gardens, Registered Battlefields, Wreck Sites and Conservation Areas deemed to

²³ Natural England (2014): 'NCA Profile: 83 South Norfolk and High Suffolk Claylands (NE544)', [online] available to access via: <http://publications.naturalengland.org.uk/publication/6106120561098752?category=587130> last accessed 21/03/2018

²⁴ Suffolk County council (2011): 'Landscape Character Typology', [online] available at: http://www.suffolklandscape.org.uk/landscape_map.aspx last accessed 21/03/2018

²⁵ Historic England (2017): 'Conservation Areas', [online] available to access via: <<https://historicengland.org.uk/listing/what-is-designation/local/conservation-areas/>> last accessed 21/03/2018

²⁶ Historic England (2016): 'Conservation Area Designation, Appraisal and Management Advice Note 1', [online] available to download from: <<https://www.historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>> last accessed 21/03/2018

²⁷ Mid Suffolk District Council (2009) Debenham Parish Conservation Area Appraisal [online] available at: <http://debenhamnp.onesuffolk.net/assets/documents/Debenham-CAA-2009-copy.pdf>

be 'at risk'. According to the 2017 Heritage at Risk Register²⁸, none of the heritage assets in the Neighbourhood Plan are at risk. However, it is important to recognise that the Heritage at Risk Registers for areas outside of London do not contain information about the status of Grade II Listed Buildings. As such, it is currently not possible to determine whether any Grade II Listed Buildings within the DNP area are at risk.

With regards to Archaeological sites of importance, there are 230 records listed on the Suffolk Historic Environment Record²⁹. These finds are primarily comprised of Roman or Medieval pottery along with a number of Stone Age sites, the earliest finds of which include Neolithic flint arrowheads. The area is particularly significant for Roman finds as about two miles south of the village there is the remains of an important east-west Roman Road.

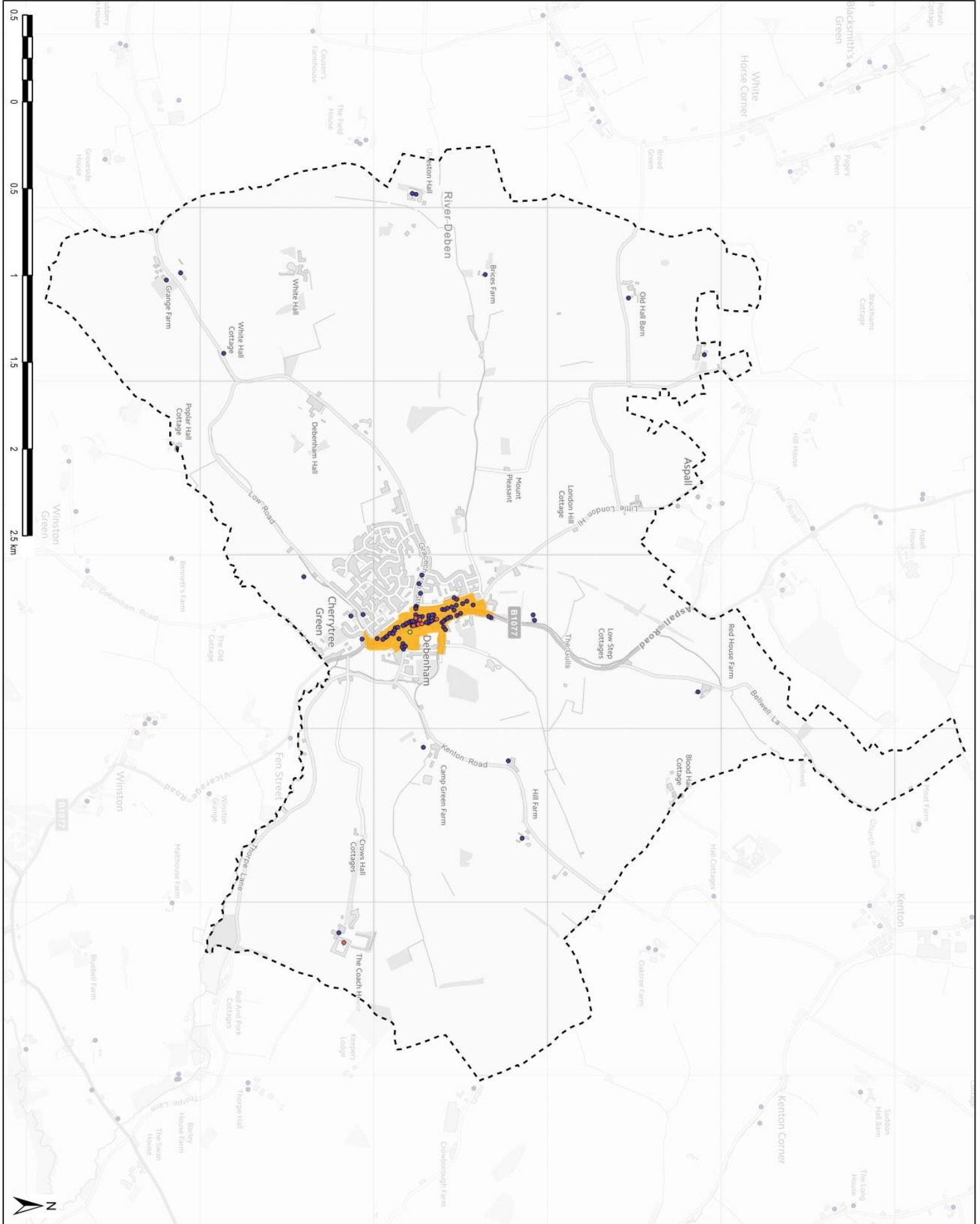
Suffolk County Council Archaeological Service, in their response to planning application DC/17/06293³⁰ have highlighted that the land to north of Gracechurch Street within the DNP area is *"in an area of high archaeological potential given its topographic location sloping down to the River Deben on the north and based upon information recorded within the County Historic Environment Record."* Consequently, the Suffolk County Council Archaeological Service recommends that any development application should be accompanied by an archaeological evaluation of the site prior to the determination of any planning application.

It should be noted that not all of the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life – whether at home, work or leisure. Although not designated, many buildings and areas are of historic interest and are seen as important by local communities. The designated heritage assets within the DNP area are shown in Figure 5.1.

²⁸ Historic England (2017): 'Heritage at Risk Record', [online] available at: <<https://historicengland.org.uk/images-books/publications/har-2017-registers/>> last accessed 21/03/18

²⁹ Suffolk Heritage Explorer [online] available at: <https://heritage.suffolk.gov.uk/hbsmr-web/Results.aspx?pageid=12&mid=16&freetext=Debenham&searchopt=AllWords&range=250&queryguid=269a6ca6-a5a5-44fb-95c5-a51f56557e41&firstrec=101&lastrec=120>

³⁰ Suffolk County Council Archaeological Service (2017) Planning Application DC/17/06293–Land to the north of Gracechurch Street, Debenham: Archaeology [online] available at: https://planning.baberghmidsuffolk.gov.uk/online-applications/files/CAEE902E59F61934FD8DD4F042C5CF61/DC_17_06293-SCC_ARCHAEOLOGICAL_SERVICE_COMMENTS-6814138.PDF



THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

- LEGEND**
- Debenham Neighbourhood Plan Area
 - Conservation Area
 - Listed building
 - Grade I
 - Grade II*
 - Grade II

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Project of Issue
DRAFT

Client
DEBENHAM PARISH COUNCIL

Project Title
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HISTORIC ENVIRONMENT AND LANDSCAPE DESIGNATIONS

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DEBENHAM NEIGHBOURHOOD PLAN

Scale
1:20,000

Figure 5.1

01

Future baseline

New development areas in the Neighbourhood Plan area have the potential to impact on the fabric and setting of cultural heritage assets; for example through inappropriate design and layout. It should be noted, however, that existing historic environment designations offer a degree of protection to cultural heritage assets and their settings.

Alongside, new development need not be harmful to the significance of a heritage asset, and in the context of the Neighbourhood Plan area there may be opportunity for new development to enhance the historic setting of the village and better reveal assets' cultural heritage significance.

New development has the potential to lead to incremental but small changes in landscape and townscape character and quality in and around the Neighbourhood Plan area. This includes from the loss of landscape features and areas with an important visual amenity value.

Land, Soil, and Water Resources

Policy context

The EU's Soil Thematic Strategy³¹ presents a strategy for protecting soils resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.

The EU Water Framework Directive (WFD) drives a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention is to establish a 'framework for integrated catchment management' across England. The Environment Agency is establishing 'Significant Water Management Issues' and recently presented second River Basin Management Plans to ministers. The plans seek to deliver the objectives of the WFD namely:

- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems;
- Promote the sustainable use of water;
- Reduce the pollution of water, especially by 'priority' and 'priority hazardous' substances; and
- Ensure the progressive reduction of groundwater pollution.

Key messages from the National Planning Policy Framework (NPPF) include:

- Protect and enhance soils. The value of best and most versatile agricultural land should also be taken into account.
- Prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.
- Encourage the effective use of land' through the reuse of land which has been previously developed, 'provided that this is not of high environmental value'. Whilst there is no longer a national requirement to build at a minimum density, the NPPF requires local planning authorities to 'set out their own approach to housing density to reflect local circumstances'.
- Produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply.

With regards to waste, the NPPF does not contain any specific waste policies as waste planning policy will be published as part of the National Waste Management Plan.

Along with the policies contained within Chapter 1 'Using and managing land sustainably' and Chapter 4 'Increasing resource efficiency, and reducing pollution and waste', Goal 2 'Clean and plentiful water', Goal 5 'Using resources from nature more sustainably and efficiently' and Goal 8 'Minimising

³¹ European Commission (2006) Soil Thematic Policy [online] available at: <http://ec.europa.eu/environment/soil/index_en.htm> last accessed 13/02/2018

waste' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment' directly relates to the land, soil and water resources SEA theme.

Other key documents at the national level include Safeguarding our Soils: A Strategy for England³², which sets out a vision for soil use in England, and the Water White Paper³³, which sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources. In terms of waste management, the Government Review of Waste Policy in England³⁴ recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.

In terms of the local context, Policies contained within the Adopted Core Strategy, and those updated by the focussed review, and which relate to Land, Soil, and Water Resources include:

- Policy CS2 (Development in the Countryside and Countryside Villages)
- Policy CS5 (Mid Suffolk's Environment)
- Policy CS6 (Services and Infrastructure)
- Policy CS7 (Brown Field Target)
- Policy CS8 (provision and distribution of housing)
- Policy SC11 (Supply of Employment Land)

Current baseline

Quality of Agricultural Land

The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land, and Grades 3b to 5 are of poorer quality. In this context there is a need to avoid loss of higher quality ('best and most versatile') agricultural land. In terms of the location of the best and most versatile agricultural land, a detailed classification has not been undertaken within the Neighbourhood Plan area. As such, there is a need to rely on the nationally available 'Provisional Agricultural Land Quality' national dataset.³⁵

The provisional Agricultural Land Quality dataset shows that the entirety of the DNP area is covered by Grade 3 agricultural land. However, the data does not differentiate as to whether this is Grade 3a (e.g. the best and most versatile) or lower quality 3b land. It is also important to note, that the national dataset is of very low resolution and it is not an accurate reflection of the agricultural land quality within the Neighbourhood Plan area (e.g a proportion of land within the DNP area will be used for non-agricultural purposes).

Watercourses

The DNP area is located within the River Deben catchment area, and is found in the headwaters of the River Deben, which is the main surface water body in the area. In regards to water quality, in 2016 the overall water quality for the Deben upstream of Brandeston Bridge is described as being heavily modified and as being overall of moderate water quality (moderate ecological and good chemical quality).

Future baseline

Due to increasing legislative and regulatory requirements, there are increasing pressures to improve recycling and composting rates.

³² Defra (2009) Safeguarding our Soils: A strategy for England [online] available to download from: <<https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>> last accessed 13/02/2018

³³ Defra (2011) Water for life (The Water White Paper) [online] available at <<http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>> last accessed 13/02/2018

³⁴ Defra (2011) Government Review of Waste Policy in England [online] available at: <<http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf>> last accessed 13/02/2018

³⁵ Natural England (2011): 'Agricultural Land Classification map East Midlands', [online] available to download via: <<http://publications.naturalengland.org.uk/publication/143027?category=5954148537204736>> last accessed [31/01/18]

In terms of water quality, the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality in watercourses in the wider area. Additionally, the Debnem water body already meets the 2027 required classification of 'moderate' overall water quality as set by the Water Framework Directive³⁶. Water quality has the potential to be affected by pollution incidents in the area, the presence of non-native species and future physical modifications to waterbodies.

Future development may result in the loss of grade 3a (the best and most versatile) agricultural land. Additionally, future development has the potential to reduce the overall water quality of the river Deben through increases in impermeable surfaces and associated surface water runoff.

Population and community

Policy context

Key messages from the National Planning Policy Framework (NPPF) include:

- To 'boost significantly the supply of housing', local planning authorities should meet the 'full, objectively assessed need for market and affordable housing' in their area. They should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period.
- With a view to creating 'sustainable, inclusive and mixed communities' authorities should ensure provision of affordable housing onsite or externally where robustly justified.
- In rural areas, when exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.
- The NPPF attaches great importance to the design of the built environment. It explains how good design is a key aspect in sustainable development, and how development should improve the quality of the area over its lifetime, not just in the short term. Good architecture and landscaping are important, with the use of design codes contributing to the delivery of high quality outcomes. Design should reinforce local distinctiveness, raise the standard more generally in the area and address the connections between people and places.
- The social role of the planning system involves 'supporting vibrant and healthy communities'.
- The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high quality public spaces, which encourage the active and continual use of public areas.
- Ensuring that there is a 'sufficient choice of school places' is of 'great importance' and there is a need to take a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.

³⁶ Environment Agency (2016) Catchment Data Explorer [online] available at: <http://environment.data.gov.uk/catchment-planning/WaterBody/GB105035046200>

The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change³⁷ warns that society is underprepared for an ageing population. The report states that *'longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises'*. The report recognises that the supply of specialist housing for the older generation is insufficient for the demand. There is a need for central and local Government, housing associations, and house builders to ensure that these housing needs are better addressed, giving as much priority to promoting an adequate market of social housing for the older generation as is given to the younger generation.

Policies contained in Chapter 1 'Using and managing land sustainably' and Chapter 4 'Increasing resource efficiency, and reducing pollution and waste' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment' directly relates to the Population and Community SEA theme.

In terms of the local context, Policies contained within the Adopted Core Strategy, and those updated by the focussed review, and which relate to Population and Community include:

- Policy CS2 (Development in the Countryside and Countryside Villages)
- Policy CS5 (Mid Suffolk's Environment)
- Policy CS6 (Services and Infrastructure)
- Policy CS7 (Brown Field Target)
- Policy CS8 (Provision and Distribution of Housing)
- Policy CS9 (Density and Mix)
- Policy CS11 (Supply of Employment Land)

Policy CS12 (Retail Provision)

Current baseline

The geographical extent of the DNP area is shown in Figure 1.1 (see Chapter 1). The total population for the DNP area has been calculated based on the Debenham Parish boundary.

Population

The population of Debenham increased at a faster percentage between 2001 and 2011 than the increases observed for Mid Suffolk, the East of England, and England as a whole.

Age structure

There is a skew towards older persons within Debenham when compared to Mid Suffolk, the East of England and the national average. For instance, 30.32% of residents in Debenham are aged over 60 compared to 27.93% in Mid Suffolk, 23.89% in the East of England, and only 22.30% in England.

There is a slightly lower proportion of people younger than 24 in Debenham (27.56%) compared to Mid Suffolk (27.62%), East of England (29.88%) and England (30.80%). Furthermore there appear to be fewer persons aged between 25-44, but more aged between 45 and 69 in Debenham compared to all other comparators.

This suggests that Debenham has a proportionally older population age structure within the resident population than all other comparators.

Household deprivation

Census statistics measure deprivation across four 'dimensions' of deprivation, summarised below:

- Employment: Any person in the household (not a full-time student) that is either unemployed or long-term sick.

³⁷ Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/> last accessed 13/02/2018

- **Education:** No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
- **Health and Disability:** Any person in the household that has generally 'bad' or 'very bad' health, or has a long term health problem.
- **Housing:** The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.

Based on the information presented in Table 7.3, 55.53% of households in Debenham are deprived in some form. This is slightly higher than the proportion seen in Mid Suffolk as a whole (51.25%), but comparable to that seen in the South East (55.24%) and lower than England as a whole (57.50%).

There are no households within the DNP area which are deprived in four dimensions compared to 0.14% in Mid Suffolk, 0.38% in the East of England, and 0.50% nationally.

Index of Multiple Deprivation

The Index of Multiple Deprivation 2015 (IMD)³⁸ is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

1. **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).
 1. **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
2. **Education, Skills and Training:** The lack of attainment and skills in the local population.
3. **Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
4. **Crime:** The risk of personal and material victimisation at local level.
5. **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
 - i. 'Geographical Barriers': relating to the physical proximity of local services
 - ii. 'Wider Barriers': relating to access to housing, such as affordability.
6. **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
 - i. 'Indoors Living Environment' measures the quality of housing.
 - ii. 'Outdoors Living Environment' measures air quality and road traffic accidents.

Two supplementary indices (subsets of the Income deprivation domains), are also included:

1. **Income Deprivation Affecting Children Index:** The proportion of all children aged 0 to 15 living in income deprived families.
2. **Income Deprivation Affecting Older People Index:** The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs) are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible. In relation to the IMD 2015, LSOAs are ranked out of the 32,844 LSOAs in England and Wales, with 1 being the most deprived. The majority of Debenham Parish boundary is covered by LSOA Mid Suffolk 007A.

³⁸ <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2015>

General trends in LSO 007A

The DNP area generally sees low levels of deprivation, scoring well across the majority of deprivation indices, with many indices being in the least 30% to least 10% deprived in the country. In particular, the DNP area is within the least 10% deprived in the country for the 'Health Deprivation and Disability' and 'Outdoor' sub-domain indices. It does however also perform poorly in two indices; specifically it is within the 20% most deprived LSOAs within the country for the 'Living Environment' domain, and within the 10% most deprived for the 'Indoors' sub domain. The 'indoors' sub domain measures the quality of housing and is made up of the following indicators –

- Houses without central heating: The proportion of houses that do not have central heating
- Housing in poor condition: The proportion of social and private homes that fail to meet the Decent Homes standard

This would suggest that some of the housing within the DNP area is potentially of poor quality and is a key contribution to deprivation within the DNP area.

Housing tenure

Within the Neighbourhood Plan area, 71.92% of residents in the Neighbourhood Plan area either own their home outright or with a mortgage. This is slightly lower than the average for Mid Suffolk (75.08%) but higher than the East (67.6%) and the proportion (63.3%) seen across England.

There are also slightly more residents within socially rented accommodation (12.62%) than Mid Suffolk (11.27%). However, this is lower than both the percentage in the East of England (15.70%) and the National Average (17.7%). The numbers in privately rented accommodation in Debenham also follow the same pattern with (12.00%) renting privately compared to 11.20% in Mid Suffolk, 14.70% in East of England and 16.80% nationally.

Education

Based on the 2011 census data, 21.98% of residents in the DNP area have no qualifications. This is marginally lower than the number for Mid Suffolk (22.33 %), and East England (22.53%) but slightly higher than the total for England (20.7%). The percentage of residents in the Neighbourhood Plan area with a Level 4 qualification or above (31.39%) is significantly higher than the totals for Mid Suffolk (26.44 %) and is significantly higher than the totals for the East (25.72%) and England (27.3%). Generally, the total percentage of residents in the Neighbourhood Plan area with Level 1, 2, 3 qualifications are slightly lower than the regional and national trends.

Employment and economy

The following three occupation categories support the most residents:

- Skilled Trades
- Professional occupations (18.06%);
- Skilled Trades (16.57%)
- Associate, professional and technical occupations (13.67%); and

Comparatively, a smaller percentage of residents in the Neighbourhood Plan area are employed in 'elementary occupations', 'sales and customer service occupations' and 'Process plant / machine operative occupations' in comparison to the regional and national trends.

Future baseline

The population structure of the DNP area has a skew towards older generations when compared to the district, region, and national averages. However, between 2001 and 2011 the population in Debenham has grown at a faster rate than all other comparators.

Population growth is likely to continue, particularly with proposed Local Plan allocations. The proportion of older people within the Neighbourhood Plan area is also likely to continue, has the potential to have knock-on effects in terms of health and social care provision.

Deprivation rates are likely to remain low, and incomes in the plan area are likely to remain generally high as evidenced by the high level of skills and educational attainment. However, Living Environment and the Indoors sub domain have been identified as indices of deprivation where the DNP performs poorly. The DNP may be able to address some of these issues through housing policies.

Health and wellbeing

Policy context

Key messages from the NPPF include:

- The social role of the planning system involves ‘supporting vibrant and healthy communities’.
- A core planning principle is to ‘take account of and support local strategies to improve health, social and cultural wellbeing for all’.
- The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities’
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.
- Set out the strategic policies to deliver the provision of health facilities.
- Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.

The policies contained in Chapter 3 ‘Connecting people with the environment to improve’ of the Government’s ‘A Green Future: Our 25 Year Plan to Improve the Environment’ directly relates to the Health and Wellbeing SEA theme.

In relation to other key national messages in relation to health, Fair Society, Healthy Lives³⁹ (‘The Marmot Review’) investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is: “overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities”.

The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions. At the regional level, the Suffolk Joint Health and Wellbeing Strategy⁴⁰ sets the long term strategic framework for improving health and wellbeing in Suffolk and guides the direction of a range of statutory, voluntary, community and private sector agencies that impact on health and wellbeing in Suffolk. The vision for this Strategy is as follows: *“People in Suffolk live healthier, happier lives. We also want to narrow the differences in healthy life expectancy between those living in our most deprived communities and those who are more affluent through greater improvements in more disadvantaged communities.”*

In terms of the local context, policies contained within the Adopted Core Strategy, and those updated by the focussed review which relate to Health and Wellbeing include:

- Policy CS2 (Development in the Countryside and Countryside Villages)
- Policy CS5 (Mid Suffolk’s Environment)
- Policy CS6 (Services and Infrastructure)

³⁹ The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available to download from: <http://www.apho.org.uk/resource/item.aspx?RID=106106> last accessed [21/03/2018]

⁴⁰ Suffolk County Council (2018): ‘Joint Strategic Needs Assessment’ [online] available to access via: <https://www.healthysuffolk.org.uk/jsna/about> [21/03/2018]

- Policy CS7 (Brown Field Target)
- Policy CS8 (Provision and Distribution of Housing)
- Policy CS9 (Density and Mix)
- Policy CS11 (Supply of Employment Land)

Policy CS12 (Retail Provision)

Current baseline

Health indicators and deprivation

Deprivation is a significant contributor to poor health and can have adverse effects on wellbeing, with elements related to poor housing quality, living environment, income and employment previously discussed in detail in Chapter 7.

As highlighted in Figure 8.1, 80.06% of residents in the Neighbourhood Plan area consider themselves as having 'very good health' or 'good health'; this proportion is marginally lower than the proportions for Mid Suffolk (83.19%), the East (82.46%) and England (81.4%). Comparatively, the total percentage of residents in the DNP area who report either 'bad health' or 'very bad health' (4.21%) is higher than the district total (3.95%), but lower than both the regional total (4.67%), and national total (5.23%).

Based on the 2011 census data, the total number of residents within the DNP area who report that their activities are limited 'a lot' by disability is lower than the totals for the East of England and England, but marginally higher than that for Mid Suffolk. Overall, 81.36% of residents within the DNP area report that their activities are not limited, which is slightly lower than the totals for Mid Suffolk (83.45%), East England (83.30%) and England (82.40%).

Future baseline

Health and well-being levels within the Neighbourhood Plan area are generally good, with a high percentage of residents reporting as having 'good' or 'very good' health. However, the number of residents reporting that their activities are limited by disability is slightly higher than district, regional, and national comparators.

A growing and ageing population within the Neighbourhood Plan area may increase the reported cases of disability, reduce the levels of good health, and place future pressures on health services in the area. Similarly, ongoing cuts to community services have the potential to lead to effects on Health and Wellbeing over the long term.

Obesity is also seen as an increasing issue by health professionals, and one that will contribute to significant health impacts on individuals, including increasing the risk of a range of diseases, including heart disease, diabetes and some forms of cancer.

Transportation

Policy context

European and UK transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth.

At the local level, each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008. Adopted in 2012, the Local Transport Plan (LTP3) strategy for Suffolk County Council sets out the vision for transport to 2031 and includes a framework for how the Council will manage and develop the transport system in Suffolk to support sustainable economic growth. In this context, the LTP3 outlines the following key areas for growth and development within Suffolk:

- Growth of ICT and ICT based businesses;
- Expansion of the Port of Felixstowe;
- The 'Energy Coast', including offshore wind and renewable energy focussed
- around Lowestoft and the development of Sizewell C nuclear power station;
- Construction of SnOasis;
- Development of University Campus Suffolk as a research centre;
- Development and growth of biotech in west Suffolk and around UCS;
- Growth of equine related organisations around Newmarket;
- Tourism, and local food and drink;
- Creative Industries

In terms of the local context, Policies contained within the Adopted Core Strategy, and those updated by the focussed review, and which relate to Population and Community include:

- Policy CS2 (Development in the Countryside and Countryside Villages)
- Policy CS8 (Provision and Distribution of Housing)
- Policy CS11 (Supply of Employment Land)
- Policy CS12 (Retail Provision)

Current baseline

Rail network

There are no railway stations within the DNP area; the nearest station is Needham Market which is located approximately 11.2km south west from the DNP area. Needham Market Railway Station is on the Ipswich to Cambridge rail line, with destinations including Bury St Edmunds and Newmarket, and sees regular services (typically one per hour) between Ipswich and Stowmarket. No main line London trains call at this station. Direct mainline services to London and Norwich run from Stowmarket which is located 15km south west of the DNP area.

Bus network

In regards to the bus network, as of August 2017 the principal routes through the DNP area are the 114, 113, 115 and 116 services. Further information on these services and the time tables can be accessed on the Suffolk County Council Website.⁴¹

Road network

In relation to the road network, the main through routes within the DNP area include the B1077 and Gracechurch Street. It has been highlighted that there are concerns about parking and traffic flows around and through the village, especially at the junction with the High St and Gracechurch St, outside the High School, in the vicinity of the Primary School, the doctors' surgery and Great Back Lane. Furthermore, through consultation carried out during development of the DNP, it has been highlighted that pedestrian safety on the road network is of importance to the village community. In this context, Gracechurch Street was identified as being of particular concern.

Cycle and footpath network

Regional Cycle Route 40 of the National Cycle Network passes through the DNP and provides an outwards link north and south from the DNP area for cyclists.⁴² In regards to footpaths, there is a network of local footpaths which pass through the DNP area.

Availability of cars and vans

Based on the 2011 census data, 86.6% of households in the Neighbourhood Plan area have access to at least one car or van, this is slightly lower than the value for Mid Suffolk (88.7%), but higher than

⁴¹ <https://www.suffolkonboard.com/buses/bus-timetables-by-area/debenham-eye-surrounding-area/>

⁴² Sustrans (2017): 'National Cycle Network Map', [online] available to view via: <<http://www.sustrans.org.uk/ncn/map>> last accessed [15/02/2018]

that seen in the East of England (81.45%), and significantly higher than the average for England (74.2%).

Travel to work

The most popular method of travelling to work in the Neighbourhood Plan area is via driving a car or van (44.1%), this is lower than the total for the district as a whole (48.5%), but slightly higher than the East of England (41.4%) and significantly higher than England (37.0%). The next most common form of travel to work in Debenham is by foot (8.3%); this level is higher than that seen in the district (5.8%), the East of England (6.8%) and England (7.0%)

Future baseline

New development has the potential to increase traffic and cause congestion within the Neighbourhood Plan area, principally along the key routes.

Additionally, public transport use has the potential to remain low compared with private car use. This is due to the infrequent nature of the bus services provided within the area and the absence of a train station within the Neighbourhood Plan area.

Whilst negative effects of new development on the transport network are likely to be mitigated in part by the Suffolk Local Transport Plan, there will be a continuing need for development to be situated in accessible locations which limit the need to travel by private car.

