



# **HAUGHLEY PARISH NEIGHBOURHOOD PLAN 2016-2036**

## **STRATEGIC ENVIRONMENTAL ASSESSMENT**

- 1. SCREENING REPORT - JULY 2018**
- 2. SCREENING DETERMINATION - AUGUST 2018**
- 3. SCOPING REPORT - OCTOBER 2018**
- 4. STRATEGIC ENVIRONMENTAL ASSESSMENT  
REPORT - DECEMBER 2018**

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# Haughley Neighbourhood Plan 2016 - 2036 Pre-Submission Plan

## Strategic Environmental Assessment (SEA) & Habitat Regulations Assessment (HRA):

### Screening Report – July 2018





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# 1. Introduction

## 1.1 The Purpose of This Report

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This screening report is an assessment of whether or not the contents of the Haughley Neighbourhood Plan 2016-2036 Pre-Submission requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/ EC and associated Environmental Assessment of Plans and Programmes Regulations. A SEA is required if the Neighbourhood Plan is deemed to have a likely significant effect on the environment.

This report will also screen to determine whether the Neighbourhood Plan requires a Habitats Regulations Assessment (HRA) in accordance with Article 6(3) and (4) of the EU Habitats Directive and with Regulation 63 of the Conservation of Habitats and Species Regulations 2017. A HRA is required when it is deemed that likely adverse significant effects may occur on protected European Sites (Natura 2000 sites) as a result of the implementation of a plan/project.

## 1.2 The Haughley Neighbourhood Plan 2016-2036 Pre-Submission Document

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For the purposes of the Neighbourhood Plan, the words “Haughley Parish“ shall mean that part of the Parish of Haughley lying to the north of the A14 and including part of the Parish of Harleston to the north of the A14.

The Neighbourhood Plan will set out planning policies for Haughley and within the confines of the Haughley Parish boundary. Once formally adopted, a Neighbourhood Plan carries the same legal weight as Local Development Plans adopted up by the Local Planning Authority (LPA), in this case Mid Suffolk District Council.

The Neighbourhood Plan states that the Vision for the Plan is:

*‘By 2036 Haughley Parish will be a connected, viable and attractive rural area with a strong heritage and community spirit. It will have a range of homes and essential public services (including high speed broadband connection) that meet the growing needs of the community and are in keeping with the area. The natural and historic environment will be protected and enhanced. Haughley Parish will be a safe and sustainable rural community where people want to live and use into the future.*

To deliver this Vision, the following Objectives have been established for the Plan:

OBJECTIVE 1	To ensure that new housing in Haughley is provided in a suitable range of tenures, types and sizes so that local people of all ages can continue to live in a suitable home and local housing needs are met, while retaining the rural character of the village and Parish.
OBJECTIVE 2	To preserve and enhance the historic built environment of Haughley.
OBJECTIVE 3	To enhance Haughley's role as a Core Village by protecting and improving existing facilities and services.



OBJECTIVE 4	To ensure that sustainable development is secured for this and future generations by protecting key environmental assets (e.g. green spaces and landscapes) and taking account of constraints (e.g. flooding).
OBJECTIVE 5	To ensure that traffic and transport issues in Haughley are tackled, including enhanced provision for walking and cycling.

### 1.3 The Mid Suffolk Core Strategy (2008) & Focused Review (2012)

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The adopted Mid Suffolk Core Strategy (2008) & Focused Review (2012) contain current strategic planning policy for the District and thus Haughley. 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 'Appropriate Assessment' in accordance with the Habitats Directive and Regulations.

The Core Strategy categorised Haughley (excluding Haughley Green within the Neighbourhood Plan area) as a 'Key Service Centre'. It 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'.*

Policy CS8 of the Core Strategy provides the outline for housing distribution across Mid-Suffolk. Housing numbers for the 2010-2025 period are provided within the policy table. A total of 3,830 homes were proposed for the 15 year period, with 500 of these being located within Key Service Centres.

### 1.4 The Emerging Mid Suffolk Local Plan

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Work has been underway for a new Joint Local Plan with Babergh and Mid Suffolk District Council. At the time of writing, a Regulation 18 stage consultation had most recently closed on the 10<sup>th</sup> November 2017. This was accompanied by a Sustainability Appraisal.

The Regulation 18 stage Local Plan identifies Haughley as a Core Village, with a 'District Centre' role related to its defined Principal Shopping Area. A number of strategic options were explored relevant to Haughley. These were:

- 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

The emerging Local Plan has reviewed Settlement Boundaries. The Plan states that,

*'The Councils have taken the approach that Urban Areas, Market Towns and Core Villages will have new growth identified and allocated in the new Local Plan through the allocation of new housing sites... Maps identifying 'committed boundaries' and potential SHELAA sites can be viewed in Appendix 3 and 4'*



Within Appendix 4, there is included a map of Haughley. The map shows three potential development sites adjacent to the existing settlement boundary of the village, and also illustrates proposed extensions to the settlement boundary.

Regarding Neighbourhood Plans, the emerging Local Plan states that,

*'Neighbourhood plans can be brought forward at any time and can be developed before or at the same time as the local planning authority is producing its Local Plan. It is for the local planning authority to work closely with neighbourhood planning groups to minimise any conflicts between policies in the neighbourhood plan and the emerging Local Plan.'*

*'There is an opportunity for local communities to bring forward sites for development in neighbourhood plans in parallel with the developing local plan process and in accordance with the emerging level of growth agreed with the local planning authority and share evidence the evidence being prepared by the Local Planning Authority and vice versa.'*

The Local Plan at the current stage of process (at the time of writing) outlines high level options with initial preference for approaches included, however there is currently an absence of draft policy wording at this stage. With this in mind, the emerging Local Plan is unlikely to have any identifiable conflict with any of the content within the emerging Haughley Neighbourhood Plan regarding the principle of development. Indeed, the Neighbourhood Plan is being prepared at a comparably advanced stage to that of the Local Plan and its evidence base.





## 2. Legislative Background

### 2.1 Strategic Environmental Assessment (SEA)

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Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment states that,

*'Environmental assessment is an important tool for integrating environmental considerations into the preparation and adoption of certain plans and programmes which are likely to have significant effects on the environment.'*

*(10) All plans and programmes which are prepared for a number of sectors and which set a framework for future development consent of projects listed in Annexes I and II to Council Directive 85/337/EEC of 27 June 1985 on the assessment of the effects of certain public and private projects on the environment(7), and all plans and programmes which have been determined to require assessment pursuant to Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild flora and fauna(8), are likely to have significant effects on the environment, and should as a rule be made subject to systematic environmental assessment. When they determine the use of small areas at local level or are minor modifications to the above plans or programmes, they should be assessed only where Member States determine that they are likely to have significant effects on the environment.'*

*(11) Other plans and programmes which set the framework for future development consent of projects may not have significant effects on the environment in all cases and should be assessed only where Member States determine that they are likely to have such effects.'*

The Haughley Neighbourhood Plan may influence frameworks for future development, or become used ancillary to those plans and programmes that do set such a framework, and as such it has been determined that the principle of the Neighbourhood Plan should be screened for the necessary application of the SEA Directive.

The Report from the Commission to The Council, The European Parliament, The European Economic and Social Committee and the Committee of the Regions states, on the application and effectiveness of the Directive on Strategic Environmental Assessment (Directive 2001/42/EC), that

*'the following P&P, and modifications to them, are covered when prepared and/or adopted by an authority[2] and required pursuant to legislative, regulatory or administrative provisions:*

- *P&P prepared for certain sectors and which set the framework for future development consent in respect of projects under the Environmental Impact Assessment-EIA-Directive.*
- *P&P requiring an assessment under the Habitats Directive (92/43/EEC).*
- *P&P setting the framework for development consent in respect of projects (not limited to those listed in the EIA Directive; see above) and determined by "screening" as being likely to have significant environmental effects.'*

This report represents this screening process in regard to the content and influence of the Haughley Neighbourhood Plan.



## 2.2 Habitats Regulations Assessment (HRA)

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Under the provisions of the EU Habitats Directive and translated into English law by the Habitats Regulations (*The Conservation of Habitats and Species Regulations 2017*), a competent authority must carry out an assessment of whether a plan or project will significantly affect the integrity of any European Site, in terms of impacting the site's conservation objectives.

HRA is the screening assessment of the impacts of a land use proposal against the conservation objectives of European sites. Specifically, it is to ascertain whether or not a proposal (either alone or in combination with other proposals) would potentially damage the internationally designated features of that site. European sites are also known as Natura 2000 sites.

This HRA Screening Report has been undertaken in order to support the Haughley Neighbourhood Plan which is being produced by Haughley Parish Council in accordance with the Neighbourhood Planning (General) Regulations 2012.

The Neighbourhood Planning (General) Regulations 2012, state that submitted Plans need to be accompanied by a statement explaining how the proposed Plan meets the 'basic conditions' set out in Schedule 4B of the 1990 Town and Country Planning Act. These basic conditions include a requirement to demonstrate how the Plan is compatible with EU obligations, which includes the need to undertake a HRA.

In line with the recent Court judgement (CJEU *People Over Wind v Coillte Teoranta C-323/17*), mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a plan or project is likely to result in significant effects on a Natura 2000 site.



## 3. SEA Screening

### 3.1 When is SEA Required?

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Planning Practice Guidance – Strategic environmental assessment requirements for neighbourhood plans (Paragraph: 026 Reference ID: 11-026-20140306) states that,

*'In some limited circumstances, where a neighbourhood plan is likely to have significant environmental effects, it may require a strategic environmental assessment. Draft neighbourhood plan proposals should be assessed to determine whether the plan is likely to have significant environmental effects. This process is commonly referred to as a "screening" assessment and the requirements are set out in regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004.*

*If likely significant environmental effects are identified, an environmental report must be prepared in accordance with paragraphs (2) and (3) of regulation 12 of those Regulations.*

*One of the basic conditions that will be tested by the independent examiner is whether the making of the neighbourhood plan is compatible with European Union obligations (including under the Strategic Environmental Assessment Directive).*

*To decide whether a draft neighbourhood plan might have significant environmental effects, it must be assessed (screened) at an early stage of the plan's preparation according to the requirements set out in regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004. These include a requirement to consult the environmental assessment consultation bodies.*

*Each consultation body will be able to advise on particular topics relevant to its specific area of expertise and responsibility, and the specific information that it holds.*

*Where it is determined that the plan is unlikely to have significant environmental effects (and, accordingly, does not require an environmental assessment), a statement of reasons for the determination should be prepared. A copy of the statement must be submitted with the neighbourhood plan proposal and made available to the independent examiner.'*

Articles 2 and 3 of the SEA Directive set out the circumstances in which an SEA is required. Table 1 sets out the assessment of whether the principle of the Haughley Neighbourhood Plan will require a full SEA.

Table 1: Exploring whether the Principle of the Plan would warrant SEA

Q	Criteria	Response	Outcome	Commentary
1	Is the Plan subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through legislative procedure by Parliament or Government	Yes	Go to question 2	The Neighbourhood Plan has been prepared for adoption through legislative procedure.
2	Is the Plan required by legislative, regulatory or <u>administrative provision</u>  Typical characteristics of "administrative provisions" are that they are publicly available, prepared in a formal way, probably involving consultation with interested parties. The administrative provision must have sufficient formality such that it counts as a "provision" and it must also use language that plainly requires rather than just encourages a Plan to be prepared.	Yes	Go to question 3	The Neighbourhood Plan would be considered as falling within the category of an 'administrative provision'.
		No	DOES NOT REQUIRE SEA	
3	Is the Plan prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive?	Yes to both criteria	Go to question 5	The Neighbourhood Plan has been prepared for town and country planning and sets a framework for future development consent
		No to either criteria	Go to question 4	
4	Will the Plan, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive?	Yes	Go to question 5	N/A
		No	Go to question 6	
5	Does the Plan determine the use of small areas at local level, OR is it a minor modification of a	Yes to either criteria	Go to question 8	The policies of the Neighbourhood Plan can be considered to determine the

Q	Criteria	Response	Outcome	Commentary
	Plan likely to require assessment under the Habitats Directive?	No to both criteria	Go to question 7	use of small areas at local level commensurate with their status in determining local planning applications. The Neighbourhood Plan also allocates land for development purposes.
6	Does the Plan set the framework for future development consent of projects (not just projects in the Annexes of the EIA Directive)?	Yes	Go to question 8	N/A
		No	DOES NOT REQUIRE SEA	
7	Is the Plans sole purpose to serve national defence or civil emergency, OR is it a financial or budget Plan, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7	Yes to any criteria	DOES NOT REQUIRE SEA	N/A
		No to all criteria	REQUIRES SEA	
8	Is it likely to have a significant effect on the environment?	Yes	REQUIRES SEA	Likely significant effects are explored in more detail elsewhere in this Screening Report.
		No	DOES NOT REQUIRE SEA	

The following section looks at the criteria for assessing the effects of the Neighbourhood Plan and the identified effects of the Neighbourhood Plan in line with the criteria. Crucially, it will determine whether there are any likely significant effects on the environment.

## 3.2 Criteria for Assessing the Effects of the Neighbourhood Plan

Criteria for determining the likely significant effects on the environment, referred to in Article 3(5) of Directive 2001/42/EC are set out below.

### Annex II of SEA Directive 2001/42/EC – Significant Effects

1. The characteristics of plans and programmes, having regard, in particular, to

- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy,
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development,
- environmental problems relevant to the plan or programme,
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to

- the probability, duration, frequency and reversibility of the effects,
- the cumulative nature of the effects,
- the transboundary nature of the effects,
- the risks to human health or the environment (e.g. due to accidents),
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
- the value and vulnerability of the area likely to be affected due to:
  - \* special natural characteristics or cultural heritage,
  - \* exceeded environmental quality standards or limit values,
  - \* intensive land-use,
  - \* the effects on areas or landscapes which have a recognised national, Community or international protection status.

### 3.3 Likely Significant Effects on the Environment resulting from the Neighbourhood Plan

The following assessment will consider the likelihood of the Haughley Neighbourhood Plan Pre-Submission Document (at the time of writing) to have significant effects on the environment.

**Table 2: Assessment of Likely Significant Effects on the Environment**

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.</p>	<p>The Plan sets out relevant policies which will be used to determine proposals for development within the Neighbourhood Area once adopted. Policy HAU2 of the Plan provides policy criteria for appropriate housing developments within the Plan area. Policies HAU3, HAU4 and HAU5 respond to housing allocations within the Plan area, including housing quantum potential for each allocation and further policy criteria specific to these sites. The combined quantum of these allocations is between 141 and 179 dwellings.</p> <p>Paragraphs 11.13 and 11.14 Pre-Submission Plan state that, <i>'Mid Suffolk District Council made a call for sites during 2014 and 2016 which were assessed. From that assessment, the land east of King George V Playing Field, site SS0270 which is situated in Station Road east of Millfields; site SS0047, which is situated south of Fishponds Way and north of the River Gipping tributary; and site SS0149 which is situated north of Fishponds Way and north of the River Gipping tributary and east of Abbeyfields, were considered suitable for development by Mid Suffolk District Council, who sought views on the sites during the initial Joint Local Plan consultation in August 2017. The consultation did not allocate any sites at that time as the strategy for the distribution of growth had not been determined.</i></p> <p><i>However, it was felt important that an independent and professional assessment was made of the possible development sites. Also, it was felt equally important that an independent and professional consultation was obtained in order to provide Masterplanning and Design guidelines that could be utilised for any allocated development sites and any future further development sites during the period of the Neighbourhood Plan. Financial assistance was sought from Locality and AECOM was commissioned to undertake producing a Masterplanning and Design Guidelines Report and a Site Assessment Report.'</i></p> <p>It should be noted that the Local Plan has not yet formally included the assessments of the above mentioned within an emerging Sustainability Appraisal, encompassing the requirement for Strategic Environmental Assessment. As the Neighbourhood Plan seeks to allocate sites in advance of the emerging Local Plan process of the District Council, any subsequent significant effects on the</p>



<p><b>Criteria for determining the likely significance of effects (Annex II SEA Directive)</b></p>	<p><b>Likelihood and summary of significant effects</b></p>
<p>The degree to which the plan or programme influences other plans or programmes including those in a hierarchy.</p>	<p>environment from development of these sites have not yet been formally identified in a manner which is consistent with the requirements of the SEA Directive. In addition, the assessment work undertaken to date does not meet the full requirements of Strategic Environmental Assessment as set out in the SEA Directive.</p> <p>As such, the allocation of these sites within the Plan ensures that significant effects on the environment can not be ruled out, particularly where the ranges of potential dwelling capacities can be considered broad.</p> <p>It should be noted however that alternative sites were also subject to assessment as part of the work undertaken by AECOM. This goes some way to forming a significant part of the Strategic Environmental Assessment that would be required.</p> <p>The Neighbourhood Plan provides policies for the Plan area, relevant to a local level only. The Plan is in general conformity to policies CS1, CS5 and CS9 of the Mid Suffolk adopted Core Strategy.</p> <p>Despite this, the Neighbourhood Plan allocates land for development purposes outside of the established Haughley Settlement Boundary identified within the adopted Mid Suffolk Core Strategy, albeit on land that is adjacent to the Settlement Boundary. This land, as defined in the adopted Mid Suffolk Core Strategy, is within the ‘countryside’ as defined.</p> <p>To this extent, the Neighbourhood Plan does influence the emerging Babergh and Mid Suffolk Local Plan, which is currently at the Regulation 18 stage, in so far as it deviates from the approach of Policy CS2 in the adopted Mid Suffolk Core Strategy, which outlines that within the ‘countryside’ development will be restricted to defined categories that the Neighbourhood Plan cannot reasonably be seen to fall within.</p> <p>The emerging Babergh and Mid-Suffolk Local Plan recognises however that many of the settlements (within Babergh Mid Suffolk) have already expanded beyond defined settlement boundaries and that these have been / are being reviewed through the plan-making process. Further, the Councils have taken the approach that Core Villages will have new growth identified and allocated in the new Local Plan through the allocation of new housing sites. The allocation of land for housing purposes within the Neighbourhood Plan can be seen as contributing to that process.</p>



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.</p>	<p>Neighbourhood Plans are required to contribute to the achievement of sustainable development. The Neighbourhood Plan policies seek to ensure environmental considerations are taken into account. The Neighbourhood Plan is compatible and does not conflict with adopted Mid Suffolk Core Strategy policies CS5 and CS9 which have been subject to a thorough process of plan preparation and accompanying Sustainability Appraisal.</p> <p>The following policies exist within the Neighbourhood Plan relevant to environmental protection:</p> <ul style="list-style-type: none"> <li>• Policy HAU14 Protection of Local Green Spaces; and</li> <li>• Policy HAU15 Protection of the Rural Landscape</li> </ul> <p>Policy HAU2 also states that proposals will be supported where they make a positive contribution to the surrounding environment and rural landscape. In addition, Policy HAU1 Haughley Spatial Strategy is consistent with aspirations in regard to the protection and enhancement of local features of ecological and historic importance however it is only this policy that specifically mentions the protection of such characteristics within the Plan area. Whereas site allocation policies consider protection relevant to these specific sites, the policies contained within the Plan are arguably insufficient in ensuring that potential effects on the environment are minimised from any development that might come forward within the plan period that is additional to the Plan's site allocations.</p>
<p>Environmental problems relevant to the plan.</p>	<p>The Neighbourhood Plan reflects a small area.</p> <p>The policy content of the adopted Core Strategy will additionally apply to any proposals within the Neighbourhood Plan area. These policies have been subject to Sustainability Appraisal And Habitats Regulations Assessment Screening within the context of the Core Strategy. The potential environmental problems relevant to the Neighbourhood Plan area include:</p> <ul style="list-style-type: none"> <li>• There are a large number of listed buildings within the Plan area, particularly within the Old Street / Duke Street area of Haughley village forming part of the Conservation Area.</li> <li>• Notable listed buildings include the Grade I Listed Church of St Mary the Virgin and the Grade II* listed New Bells Farmhouse.</li> <li>• Haughley Castle is a Scheduled Monument within the Plan area and adjacent to the development boundary of Haughley.</li> <li>• South of the main village lies the northern side of a valley formed by a tributary of the River Gipping. This wooded valley is within Flood Zones 2 and 3.</li> <li>• The plan area contains a large number of priority habitats, including in large areas surrounding the main village</li> </ul>



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<p>development boundary. These include traditional orchard, deciduous woodland, wood pasture and parkland Priority habitats, mixed mainly conifer woodland, broadleaved woodland, young tree woodland and good quality semi-improved grassland (non-Priority). A large area of land to the south west of the development boundary (west of The Folly) is also identified as an area of ‘no main habitat but additional habitat exists.’</p> <ul style="list-style-type: none"> <li>• The Neighbourhood Plan Area is within a Groundwater Source Protection Zone – Total Catchment (Zone 3).</li> <li>• The Plan area contains Grade 2 agricultural land (‘very good’) around the main village of Haughley. This represents the best and most versatile land within the wider District.</li> </ul>
<p>The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).</p>	<p>The content of the Neighbourhood Plan is not in conflict with those relevant planning documents within the wider district and county area related to waste management or water protection.</p>
<p>The probability, duration, frequency and reversibility of the effects on the following factors:</p> <p style="text-align: center;">Sustainability Theme</p> <ul style="list-style-type: none"> <li>- Biodiversity</li> <li>- Population</li> <li>- Human health</li> </ul>	<p>The following impacts have been identified within this Screening Assessment:</p> <p>There are no wildlife designations within the Plan area. Although there are a high number of priority habitats in the Plan area covering a large amount of land, none of the Plan’s allocations would result in any loss of these features. The Plan’s allocations to the south of the development boundary are adjacent to deciduous woodland associated with the river valley. Although there may be some level of impact on biodiversity, significant effects that would warrant the application of the SEA Directive can be ruled out.</p> <p>The Neighbourhood Plan identifies and allocates 3 sites which are considered suitable for residential development. The combined quantum of these allocations, as allocated within Policies HAU3, HAU4 and HAU5 is between 141 and 179 dwellings. There are therefore likely to be a degree of impact on the current population and also in general as a result of new development. This is likely to be realised in relation to infrastructure capacities such as schools and utilities. As this information is not available, effects can not be ruled out.</p> <p>The Plan does not allocate any land for development purposes that could have any implications regarding human health although the</p>



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<p>allocation land to the west of Fishponds Way is adjacent to a waste water treatment plant which could have some degree of impacts regarding noise and odour. Policy HAU5 ensures that this should be assessed as part of any planning application. The Plan seeks to safeguard all green spaces within the Plan area in Policy HAU14 in order to ensure that this space is preserved for the purposes of health and well-being. Additionally, site allocation policies seek sufficient outdoor green space be incorporated into schemes.</p> <p>It can be considered that no significant effects will occur upon Human health in the Neighbourhood Plan area. Any potential impacts regarding contamination of any future proposals are best addressed at the 'project level', through the development management process and in adherence to relevant policies at the LPA level.</p>
- Fauna	<p>The impacts of the Neighbourhood Plan on fauna are not considered significant. It is possible that developments that could be forthcoming within the Plan area could have negative impacts on protected species; however these cannot be identified as strategically significant to warrant Strategic Environmental Assessment at the Plan level. Such issues are more appropriate to be considered on a case-by-case application basis at the development management stage in consideration of the Neighbourhood Plan policies and relevant policies contained within Mid Suffolk's adopted Core Strategy and emerging Local Plan (commensurate the level of weight those policies would have at the time of application).</p>
- Flora	<p>An area of Priority Habitat Deciduous Woodland exists adjacent to proposed site allocations to the south of the development boundary. No such areas are likely to be lost as a result of development. There will be no likely effects on Flora that can be significant to warrant the application of the SEA Directive.</p>
- Soil	<p>The Neighbourhood Plan area is within Grade 2 and Grade 3 Agricultural Land ('very good' and 'good to moderate' respectively). Grade 2 Agricultural Land represents the best and most versatile agricultural land within the wider District. Such losses can be expected through the Plan's site allocations and as such negative effects can be expected.</p>
- Water	<p>The Neighbourhood Plan Area is within a Groundwater (Source) Protection Zone – Total Catchment (Zone 3). Source Protection Zones (SPZs) respond to sources such as wells, boreholes and springs used for public drinking water supply. These zones show the risk of contamination from any activities that might cause pollution in the area. The Neighbourhood Plan allocates land for residential development purposes. Residential land uses are not considered to give rise to ground water pollutants (e.g. give rise to hazardous</p>

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<p>substances such as pesticides, oils, petrol and diesel, solvents, arsenic, mercury or chromium VI; or non-hazardous substances such as ammonia or nitrates).</p> <p>The HRA Screening element of this report determines that Haughley is outside the Zone of Influence of any N2k sites regarding impacts on water quantity and quality.</p>
- Air	<p>No AQMAs or other identified air quality issues exist within or in close proximity to the Neighbourhood Plan area. The Plan does allocate land for development purposes, but these are not considered to contribute to any cumulative air quality impacts. As such, no significant effects on air quality have been deemed likely.</p>
- Climatic factors	<p>The majority of the Neighbourhood Plan area is within Flood Zone 1; however a tributary of the River Gipping is present south of the development boundary. The presence of the tributary ensures that a significant amount of land is within Flood Zones 3 and 2 associated with this water course. The Plan's allocations are not within any land identified within Flood Risk Zones 2 or 3, but all are adjacent to such land. Nevertheless, no significant effects have been identified.</p>
- Material assets	<p>The content of the Neighbourhood Plan is not considered to have any significant impacts on material assets due to the extent / size of the Neighbourhood Plan Area. Such issues are more appropriate to be considered on a case-by-case basis at the development management stage and in accordance with relevant development management policies contained within Mid Suffolk's adopted Core Strategy.</p>
- Cultural heritage	<p>A large amount of Listed Buildings exist within the Neighbourhood Plan area, the majority of these are within the Conservation Area, which forms a significant part of the settlement boundary. The Plan allocates 3 sites for development. Although no allocation contained within these policies is within the immediate curtilage of a Listed Building, there is some potential for harm to a number of isolated Listed Buildings, particularly site SS0270 which is in relatively close proximity to the Grade II listed Hill Farmhouse and SS0047 which is in close proximity to the Grade II listed The Firs. It should be noted however that Policy HAU9 exists to ensure that the significance of heritage assets is preserved and where possible enhanced through proposals. Detail on any individual impacts of schemes would be a development management matter, on a case-by-case basis, and not strategic in scope to warrant the application of SEA at the plan-level. There is considered to be no likely significant effect on cultural heritage / the historic environment that would specifically warrant the application of the SEA Directive and a commitment to undertake a SEA.</p>



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>- Landscape</p> <p>The cumulative nature of the effects.</p> <p>The trans boundary nature of the effects.</p> <p>The risks to human health or the environment (e.g. due to accidents).</p>	<p>The Neighbourhood Plan area is within Natural England’s South Norfolk and High Suffolk Claylands (NCA) profile. The overall character is of a gently undulating, chalky glacial till plateau, frequently open views confined by occasional hedges and trees, with some woodland present.</p> <p>The Suffolk Landscape Character Assessment indicates that Haughley and Haughley Green fall within the landscape character type of Ancient Plateau Claylands. This assessment states that for this landscape typology <i>‘this is quite open landscape with the potential of any form of development to be visibility intrusive if it has been designed without sufficient screening or an appropriate landscape design plan.’</i> It adds that <i>‘to maintain the character and condition of the landscape any major developments will enter into a Section 106 Legal Agreement for landscaping.’</i></p> <p>Policies within the Plan ensure that dwellings on the edge of the development area provide suitable landscaping options to assimilate into the character area. To this extent, the Plan ensures that potential landscape implications of proposals are suitably considered and significant effects minimised.</p> <p>The Plan allocates land for development purposes which has not been subject to any cumulative assessment of impacts through any formal or legally required purpose. Environmental protection policies exist within the Plan for the purpose of ensuring that individual schemes are unlikely to result in inappropriate development, however cumulative significant effects on the environment can not be ruled out at this stage.</p> <p>The findings of the HRA Screening element of this Report do not indicate any trans boundary effects.</p> <p>There is limited risk to human health or the environment as a result of the Neighbourhood Plan. This is in consideration of the above screening requirements related to sustainability themes. The Neighbourhood Plan is primarily focused on housing, whilst retaining the character of Haughley. This land use is unlikely to give rise to any accidents that can be considered to have a significant risk to human health or the environment.</p>
<p>The magnitude spatial extent of the effects (geographical area and size of the population likely to be affected).</p>	<p>The spatial extent of development resulting from the Neighbourhood Plan is identified within policies HAU3, HAU4 and HAU5 as within a broad range of between 141 and 179 dwellings. Although the magnitude of effects can be considered small in the wider District context, proportionately the scale and location of development proposed (in relation to one another and the existing village of Haughley) is significant. The magnitude and spatial extent of effects</p>



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>The value and vulnerability of the area likely to be affected due to:</p> <ul style="list-style-type: none"> <li>- special natural characteristics or cultural heritage</li> <li>- exceeded environmental quality standards</li> <li>- intensive land use</li> </ul>	<p>would be best explored through application of the SEA Directive.</p> <p>As highlighted above in the screening of the Plan per sustainability theme, the Neighbourhood Plan has been assessed as potentially having significant effects on environmental quality standards as a result of intensive land use that would warrant further assessment through SEA.</p>
<p>The effects on areas or landscapes which have a recognised national, community or international protection status.</p>	<p>As highlighted above in the screening of the Plan per sustainability theme, the Neighbourhood Plan has been assessed as not having any significant effects on areas or landscapes which have a recognised national, community or international protection status.</p>



## 4. HRA Screening

### 4.1 Habitat Regulations Assessment of Development Plans

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This section forms a plan level Habitats Regulations Assessment (HRA) as required by Regulation 63 of The Conservation of Habitats and Species Regulations 2017.

Under the provisions of the EU Habitats Directive and translated into English law by the Habitats Regulations (The Conservation of Habitats and Species Regulations 2017), a competent authority must carry out an assessment of whether a plan or project will significantly affect the integrity of any European Site, in terms of impacting the site's conservation objectives.

HRA is the screening assessment of the impacts of a land use proposal against the conservation objectives of European sites. Specifically, it is to ascertain whether or not a proposal (either alone or in combination with other proposals) would potentially damage the internationally designated features of that site. European sites are also known as Natura 2000 sites.

This HRA Screening Report has been undertaken in order to support the Haughley Neighbourhood Plan which is being produced by Haughley Parish Council in accordance with the Neighbourhood Planning (General) Regulations 2012. The area covered by the Plan is shown in Appendix 1.

The Neighbourhood Planning (General) Regulations 2012, state that submitted Plans need to be accompanied by a statement explaining how the proposed Plan meets the 'basic conditions' set out in Schedule 4B of the 1990 Town and Country Planning Act. These basic conditions include a requirement to demonstrate how the Plan is compatible with EU obligations, which includes the need to undertake a HRA.

This section of this Report aims to:

- Identify the European sites within 20km of Haughley.
- Summarise the reasons for designation and Conservation Objectives for each site to be considered in this assessment.
- Screen the Haughley Neighbourhood Plan for its potential to impact upon a European(or Natura) site (N2k).
- Assess the potential for in combination effects from other projects and plans in the area.
- Identify if there are any outstanding issues that need further investigation.





## 4.2 Natura 2000 Sites

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Natura 2000 is the centrepiece of EU nature and biodiversity policy. It is an EU wide network of nature protection areas. The aim of the network is to assure the long-term survival of Europe's most valuable and threatened species and habitats.

The sites are designated under the European Union (EU) Birds Directive (Council Directive 79/409/EEC on the Conservation of Wild Birds) and the EU Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora).

The Birds Directive requires the establishment of Special Protection Areas (SPAs) for birds. The Habitats Directive similarly requires Special Areas of Conservation (SACs) to be designated for other species, and for habitats. Wetlands of International Importance (Ramsar sites) are also part of the Natura 2000 network. This is because all SPAs and SACs are comprised of Sites of Special Scientific Interest (SSSIs) and all Ramsar sites in England are SSSIs. Together, SPAs, SACs and Ramsar Sites make up the Natura 200 network in England.

### 4.2.1 Explanation of SPAs, SACs and Ramsar Sites

#### **Special Protection Areas (SPAs)**

SPAs are areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within EU countries. Example: The Deben Estuary is internationally important for wintering waterfowl. Legislation: EU Birds Directive.

#### **Special Areas of Conservation (SACs)**

SACs are areas designated to protect habitat types that are in danger of disappearance, have a small natural range, or are highly characteristic of the region; and to protect species that are endangered, vulnerable, rare, or endemic. Example: Waveney and Little Ouse Valley Fens for calcareous fens, *Molinia* meadows and Desmoulin's whorl snail. Legislation: EU Habitats Directive.

#### **Wetlands of International Importance (Ramsar Sites)**

Ramsar Sites are designated to protect the biological and physical features of wetlands, especially for waterfowl habitats. For example, Redgrave and South Lopham Fens is an extensive example of lowland base-rich valley, remarkable for its lack of fragmentation which supports many rare and scarce invertebrates, including a population of the fen raft spider *Dolomedes plantarius*. Ramsar sites often overlap with SACs and SPAs and UK planning policy determines that they should be accorded the same importance when developments are proposed. Legislation: Ramsar Convention (1971) – Wetlands of International Importance.



## 4.2.2 European Sites to be considered

There are three European sites which lie within 20 km of Haughley parish. No European Sites lie within 13km of Haughley parish, which is the largest Zone of Influence for any N2k site in Suffolk and the distance recently confirmed by Natural England as the zone of influence to identify potential recreational impacts on coastal statutory sites in Suffolk.

**Table 3: European Sites within 20km of the development**

SPA	SAC	Ramsar
None	Waveney & Lt Ouse Valley Fens	Redgrave & South Lopham Fens

The locations and boundaries of the above sites are shown on the map in Appendix 2.

There are therefore no European sites to be considered to be within scope for this assessment.

## 4.3 Method and Approach

The Neighbourhood Planning (General) Regulations 2012, state that submitted Plans need to be accompanied by a statement explaining how the proposed Plan meets the ‘basic conditions’ set out in Schedule 4B of the 1990 Town and Country Planning Act. These basic conditions include a requirement to demonstrate how the Plan is compatible with EU obligations, which includes the need to undertake a HRA screening report; this is necessary to ensure the making of the neighbourhood plan is not likely to have a significant effect on a European site or a European offshore marine site, either alone or in combination with other plans or projects.

There are only two stages for Neighbourhood Plans as the CJEU ruling means that mitigation measures cannot be considered at HRA screening. The outcomes of the two stages are described in more detail in the following table. This document relates only to Stage 1 of the HRA process.

**Table 4: Stages of the Habitats Regulations Assessment process for Neighbourhood Plans**

Stage	Tasks	Outcome
Stage 1 HRA Screening	<ul style="list-style-type: none"> <li>• Description of the policies or projects</li> <li>• Identification of potential effects on a European site</li> <li>• Assessing the effects on a European site either alone or in combination with other plans or projects</li> </ul>	<p>Where effects are unlikely, prepare a ‘finding of no significant effect’ report.</p> <p>Where effects judged likely, or lack of information to prove otherwise, go to Stage 2.</p>
Stage 2 Revision of the plan to	<ul style="list-style-type: none"> <li>• If impacts considered to affect</li> </ul>	Approve the plan.

Stage	Tasks	Outcome
remove likely significant effects	qualifying features, those policies (and projects) that are likely to result in significant effects on any European site should be removed from the plan.	If effects remain after alternative solutions been considered, the plan cannot be made.  <i>People over Wind CJEU ruling (April 2018) means that it is not possible to consider mitigation measures when screening for impacts.</i>

### 4.3.1 Stage 1: HRA Screening

The screening stage identifies if alternatives are needed because any policies or projects will have an impact on a European Site, amendments need to be made in Neighbourhood Development Plans. Table 6 identifies the different categories assigned to each policy in the plan: Category A identifies those policies or projects that may not result in a Likely Significant Effect and are considered to have No Negative Effect. Category B identifies those policies or projects that will have No Likely Significant Effect. Category C identifies those policies or projects that might have Likely Significant Effect and thus upon a European Site either alone or in combination with other plans or projects. Section 4 considers each policy or projects and the results of the screening exercise recorded.

Table 5: Screening categorisation

#### Category A : No negative effect

Policies or projects that will not be likely to have any negative effect on a European site.

#### Category B : No Likely Significant Effect

Policies or projects that could have an effect but would not be likely to have a *significant* negative effect on a European site alone or in combination. This conclusion could only be reached if the effects, even in combination and taking the precautionary principle into account, are considered trivial.

#### Category C : Likely Significant Effect

Policies or projects which are predicted to have a likely significant effect on their own or in combination with other plans and projects.

### 4.3.2 Potential impacts of Haughley Neighbourhood Plan on Natura 2000 sites

There are a wide range of impacts and these can be summarised as -

- Land take by developments;
- Impact on protected species found within but which travel outside the protected sites may be relevant where development could result in effects on qualifying interest species within the European site, for example through the loss of feeding grounds for an identified species.



- Increased disturbance, for example from recreational use resulting from new housing development and / or improved access due to transport infrastructure projects;
- Changes in water availability, or water quality as a result of development and increased demands for water treatment, and changes in groundwater regimes due to increased impermeable areas;
- Changes in atmospheric pollution levels due to increased traffic, waste management facilities etc. Pollution discharges from developments such as industrial developments, quarries and waste management facilities.

In line with the HRA for Mid Suffolk District Council Core Strategy, each policy will be assessed against the criteria in the table below.

**Table 6: Assessment of potential impacts**

Nature of potential impact	How the Haughley Neighbourhood Plan (alone or in combination with other plans and project) could affect a Natura 2000 site?	Why these effects are not considered significant?
Land take by development	Haughley is outside the boundaries of any N2k sites	N/A
Impact on protected species outside the protected sites	Haughley is outside the Zone of Influence of any N2k sites	N/A
Recreational pressure and disturbance	Haughley is outside the Zone of Influence of any N2k sites	N/A
Water quantity and quality	Haughley is outside the Zone of Influence of any N2k sites	N/A
Changes in pollution levels	Haughley is outside the Zone of Influence of any N2k sites	N/A



## 4.4 Results from HRA Screening of Draft Neighbourhood Plan Policies

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The Screening exercise explores whether there will be any Likely Significant Effect resulting from the Plan's policies. These Policies are:

- Policy HAU1 Haughley Spatial Strategy
- Policy HAU2 Housing Developments within Settlement Boundaries
- Policy HAU3 New Homes at Land East of King George V Playing Field
- Policy HAU4 Allocation of Site SS0270 in Station Road East of Millfields for Development
- Policy HAU5 Allocation of Part of the Site SS0047 south of Fishponds Way for Development
- Policy HAU6 Sites for Commercial and Industrial Development
- Policy HAU7 Protection of Employment and Existing Businesses
- Policy HAU8 Broadband
- Policy HAU9 Development Affecting Haughley's Built Heritage Assets
- Policy HAU10 Possible New Development in the Conservation Area
- Policy HAU11 Development Design and Character
- Policy HAU12 Protection of Local Community Facilities
- Policy HAU13 Provision of new Retail and Community Facilities
- Policy HAU14 Protection of Local Green Spaces
- Policy HAU15 Protection of the Rural Landscape
- Policy HAU16 Paths and Bridleways

Additionally, this Screening exercise explores the implications of the Plan's Community Needs and Desires (CNDs). These correspond to the use of land for a number of purposes. These are listed as:

- CND1 Haughley Crawford's School
- CND2 King George V Playing Field and Ron Crascall Pavilion
- CND3 Cemetery Space
- CND4 Traffic Calming Haughley Crawford's School
- CND5 Fishponds Way Footpath
- CND6 Haughley Green Footpath
- CND7 Central Haughley Traffic Flow and Safety

Each of the policies and CNDs in the Haughley Neighbourhood Plan has been screened to identify whether they would have any impact on a European Site. This assessment can be found in the following table.

Table 7: Assessment of potential impacts

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
Policy HAU1 Haughley Spatial Strategy	<p>Settlement Boundaries are identified on the Proposals Map PM2, PM3 and PM4. Within these boundaries, development shall be permitted where;</p> <ul style="list-style-type: none"> <li>• It is of a scale, density and character appropriate to the location;</li> <li>• Retention of the site in its present state does not form an essential part of the local character;</li> <li>• Development would protect and enhance local features of green space, landscape, ecological or historic importance; and</li> <li>• There is the necessary infrastructure capacity to support the development.</li> </ul> <p>Outside Settlement Boundaries, only development for agriculture, horticulture, forestry, outdoor recreation and other uses which need to be located in the countryside or where supported by other policies in this Plan will be permitted.</p>	No, Category A	No specific recommendations
Policy HAU2 Housing Developments within Settlement Boundaries	<p>Within the Settlement Boundaries, as defined on the Proposals Maps, PM2, PM3 and PM4, there is a general presumption in favour of residential development.</p> <p>Proposals will be supported where;</p> <ul style="list-style-type: none"> <li>• They reflect the role and function of Haughley village and relate well to the existing layout of the village,</li> <li>• They are of a high standard of design and make a positive contribution to the surrounding environment and rural landscape,</li> <li>• They do not result in the loss of a community facility in Haughley village,</li> <li>• They contribute to maintaining an appropriate mix of tenures, types and sizes of dwelling in Haughley village. In particular, bungalows and smaller dwellings of one or two bedrooms will be encouraged,</li> <li>• Sites including affordable housing should integrate both affordable housing and market</li> </ul>	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
	<p>housing across a site. Under current planning legislation, affordable housing can be sought on sites of more than 10 homes. Development that leads to concentrations of different types and tenures of homes in separate groups will not be supported,</p> <ul style="list-style-type: none"> <li>• Each new dwelling should provide parking space at least to minimum MSDC standards, as contained within the Suffolk Guidance for Parking updated 2015,</li> <li>• The planning and design guidelines contained in the independent AECOM Masterplanning and Design Guidelines Report (See Supporting Document SD2) are to be followed.</li> </ul> <p>The scale and nature of all schemes must ensure an appropriate level of services, facilities and infrastructure, including primary school capacity, are available or can be provided to serve the proposed development.</p>		
Policy HAU3 New Homes at Land East of King George V Playing Field	<p>Land east of King George V Playing Field, as identified on the Proposal Map PM2, is allocated for up to 98 homes providing the following are part of the development;</p> <ul style="list-style-type: none"> <li>• A raised table zebra crossing with associated signs and road markings is provided crossing Green Road to Haughley Crawford's School from King George V Playing Field,</li> <li>• The housing density is no higher than 23 dwellings per hectare (dph),</li> <li>• The mix of dwelling types and sizes across all tenures including bungalows,</li> <li>• The development will include 35% of affordable housing to address local housing needs,</li> <li>• Sufficient outdoor green space with high standard landscaping is included,</li> <li>• New pedestrian linkages to enable residents to walk to all facilities in the village centre without walking along Green Road,</li> <li>• Each new dwelling will include adequate parking space at least to minimum standards, as contained within the Suffolk Guidance for</li> </ul>	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
	Parking updated 2015.		
Policy HAU4 Allocation of Site SS0270 in Station Road East of Millfields for Development	<p>This site has the potential to deliver between 18-31 new homes. The variation in the housing yield is dependent upon the medium constraint of the existing overhead power line either remaining or being buried underground.</p> <p>Development of the site must follow the stipulations contained in Policy HAU1, Policy HAU2 and follow the guidelines within the AECOM Site Assessment Report and the AECOM Masterplanning and Design Guidelines Report and providing the following are part of the development;</p> <ul style="list-style-type: none"> <li>• The housing density is no higher than 23 dwellings per hectare (dph),</li> <li>• The mix of dwelling types and sizes across all tenures including bungalows,</li> <li>• The development will include 35% of affordable housing to address local housing needs,</li> <li>• Sufficient outdoor green space with high standard landscaping is included,</li> <li>• New pedestrian linkages to enable residents to walk to all facilities in the village centre,</li> <li>• Each new dwelling will include adequate parking space at least to minimum standards, as contained within the Suffolk Guidance for Parking updated 2015.</li> </ul>	No, Category A	No specific recommendations
Policy HAU5 Allocation of Part of the Site SS0047 south of Fishponds Way for Development	<p>This site has the potential to deliver between 25-50 new homes. The minor constraints of the developed tree line, proximity to flood risk and proximity to the sewerage works must be fully assessed.</p> <p>Development of the site must follow the stipulations contained in Policy HAU1, Policy HAU2 and follow the guidelines within the AECOM Site Assessment Report and the AECOM Masterplanning and Design Guidelines Report and providing the following;</p> <ul style="list-style-type: none"> <li>• The housing density is no higher than 23 dwellings per hectare (dph),</li> <li>• The mix of dwelling types and sizes across</li> </ul>	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
	<p>all tenures including bungalows,</p> <ul style="list-style-type: none"> <li>• The development will include 35% of affordable housing to address local housing needs,</li> <li>• Sufficient outdoor green space with high standard landscaping is included,</li> <li>• New pedestrian linkages to enable residents to walk to all facilities in the village centre,</li> <li>• Each new dwelling will include adequate parking space at least to minimum standards, as contained within the Suffolk Guidance for Parking updated 2015.</li> <li>• A new footpath will be provided as part of the development from the River Gipping tributary along Fishponds Way to the Eve Balfour Way junction on Fishponds way, suitable for all pedestrians, buggies, wheelchairs, horses and cyclists.</li> </ul>		
<p>Policy HAU6 Sites for Commercial and Industrial Development</p>	<p>Commercial and industrial developments will be supported where they are situated on the brownfield sites of;</p> <ul style="list-style-type: none"> <li>• The ex-Little Chef building adjacent to the Travelodge Hotel situated on the south side of the old A14,</li> <li>• The previous commercial areas of Haughley Park,</li> <li>• The Tothill site surrounding and adjacent to the BP Garage and retail outlets on the north side of the Old A14 leading towards Stowmarket</li> </ul> <p>as identified on the Proposals Maps PM5 and PM6.</p>	<p>No, Category A</p>	<p>No specific recommendations</p>
<p>Policy HAU7 Protection of Employment and Existing Businesses</p>	<p>Proposals for non-employment use on sites and premises used and/or designated on the Proposals Maps PM5 and PM6 for employment purposes, will only be permitted where;</p> <ul style="list-style-type: none"> <li>• It will not result in a loss of employment provision in the Neighbourhood Plan area,</li> <li>• There is sufficient supply of alternative and suitable employment land available within the Neighbourhood Plan area or in adjacent towns</li> </ul>	<p>No, Category A</p>	<p>No specific recommendations</p>



Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
	<p>and villages to meet local employment job growth requirements,</p> <ul style="list-style-type: none"> <li>• It can be demonstrated that the current employment use is not economically viable nor likely to become viable. Where appropriate, supporting financial evidence should be provided including any efforts to advertise the premises for sale for a minimum of 12 months,</li> <li>• The existing use has created over-riding environmental problems (e.g. noise, odours or traffic) and permitting an alternative use would be a substantial environmental benefit that would outweigh the loss of an employment site,</li> <li>• An alternative use or mix of uses would assist in urban regeneration and offer greater benefits to the community in meeting local businesses and employment needs,</li> <li>• It is for an employment related support facility such as employment training/education, workplace crèche or industrial estate café,</li> <li>• An alternative use or mix of uses would provide other sustainability benefits that would outweigh the loss of an employment site.</li> </ul>		
Policy HAU8 Broadband	All new dwellings and business buildings shall incorporate a suitable infrastructure to enable high speed broadband to be connected.	No, Category A	No specific recommendations
Policy HAU9 Development Affecting Haughley's Built Heritage Assets	<p>To ensure the conservation and enhancement of Haughley's historic environment, proposals should;</p> <ul style="list-style-type: none"> <li>• Preserve or enhance the significance of the Heritage Assets of the village, their setting and the wider village,</li> <li>• Retain buildings and spaces, the loss of which would cause harm to the character or appearance of the Conservation Area,</li> <li>• Contribute to the local distinctiveness, built form and scale of Heritage Assets through the use of appropriate design, materials and workmanship,</li> <li>• Be of an appropriate scale, form, height,</li> </ul>	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
	<p>massing, alignment and detailed design which respects the village's character, appearance and its setting,</p> <ul style="list-style-type: none"> <li>• Demonstrate a clear understanding of the significance of the asset and other wider context in which the Heritage Asset sits, alongside assessment of the potential impact of the development on the Heritage Asset and its context, and</li> <li>• Provide clear justification for any works that would lead to harm or substantial harm to a Heritage Asset yet be of substantial public benefit, through detailed analysis of the asset and the proposal.</li> </ul> <p>In particular, development proposals will be supported where they;</p> <ul style="list-style-type: none"> <li>• Achieve continuity in street frontage building lines set on the back edge of the pavement,</li> <li>• Maintain the historic pattern of development by respecting the historic grain associated with historic plots and the historic morphology of development in the immediate area,</li> <li>• Reflect the proportion of solid to void found in the elevations of traditional buildings and employ robust detailing, avoiding the use of applied features or detailing,</li> <li>• Reinforce local identify by the use of the traditional materials used in the Conservation Area,</li> <li>• Re-use traditional buildings which contribute to townscape quality.</li> </ul>		
Policy HAU10 Possible New Development in the Conservation Area	<p>All new development within the Conservation Area (as identified on the Proposals Map PM2) and/or within the setting of a listed building (see Appendix 1. "Listed Buildings within Haughley Parish") will be expected to enhance the positive attributes of the Heritage Asset.</p> <p>Development that will harm a Heritage Asset or the setting of a Heritage Asset will not be supported unless substantial public benefits outweigh the harm.</p>	No, Category A	No specific recommendations



Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
Policy HAU11 Development Design and Character	<p>All new development will be expected to enhance the positive attributes of the village and local design features. Development will not be supported where it has a detrimental impact on the character of the area in which it is located.</p> <p>New development will be supported when, where relevant, it;</p> <ul style="list-style-type: none"> <li>• Demonstrates consideration has been given to the use of brownfield sites/conversion of existing buildings,</li> <li>• Is capable of being connected to essential infrastructure services with capacity,</li> <li>• Does not have a detrimental effect on residential amenity by reason of noise or other nuisance,</li> <li>• Does not have a severe cumulative adverse effect on the safe and efficient operation of the existing transport and road infrastructure,</li> <li>• Does not result in the loss of an area which makes a significant contribution to public amenity by virtue of its open space character, appearance and function,</li> <li>• Includes measures that encourage walking and cycling, wherever possible,</li> <li>• Makes a contribution to local identity and sense of place,</li> <li>• Is suitable in terms of overall design and appearance of the proposed development (including size, scale, density, layout, access) when assessed in relationship with surrounding buildings, spaces and other features of the street scene,</li> <li>• Uses, and where appropriate re-uses, local and traditional materials,</li> <li>• Contributes to reducing carbon emissions, where possible,</li> <li>• Includes adequate parking space to at least legal minimum standards contained within the Suffolk Guidance for Parking updated 2015, and private and public amenity for future residents.</li> </ul>	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
Policy HAU12 Protection of Local Community Facilities	<p>Proposals for the change of use of social or community facilities, such as the Co-op store, Post Office, pub, Village Hall, Maxwell Charnley Community Room, Ron Crascall Pavilion, leisure and sports facilities, education facilities and religious buildings as would result in the loss of such facilities, will not be supported unless;</p> <ul style="list-style-type: none"> <li>• Equivalent or better provision for the facility to be lost is made elsewhere within the Settlement Boundary, or</li> <li>• It can be demonstrated through active marketing, that there is no longer a demand for the facility.</li> </ul>	No, Category A	No specific recommendations
Policy HAU13 Provision of new Retail and Community Facilities	<p>Development proposals for new, expanded or improved retail, commercial and community facilities will be supported when;</p> <ul style="list-style-type: none"> <li>• They do not have an adverse impact on residential amenity,</li> <li>• Their design enhances the character of the immediate surroundings and is sympathetic to the locally distinctive nature of traditional design in the village,</li> <li>• They do not lead to traffic management problems,</li> <li>• They encourage walking and cycling,</li> <li>• Off-road car parking in the central part of Haughley village is included as part of the proposed facility.</li> </ul>	No, Category A	No specific recommendations
Policy HAU14 Protection of Local Green Spaces	<p>Football pitch and children's play area (King George V Playing Field), Village green, Haughley Green Cricket, Church graveyard, Gallowsfield Wood, Haughley Castle Motte and Bailey. See Supporting Document SD4 "Local Green Space Appraisal".</p>	No, Category A	No specific recommendations
Policy HAU15 Protection of	Within Settlement Boundaries, visually important open spaces, per the MSDC	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
the Rural Landscape	1998 Local Plan, as identified on the Proposals Map PM2, will be protected because of their contribution to the character or appearance of their surroundings and their amenity value to the local community.		
Policy HAU16 Paths and Bridleways	New housing and business developments shall encourage usage of, and provide linkage to, the network of existing paths and bridleways in and around Haughley Parish.	No, Category A	No specific recommendations
CND1 Haughley Crawford's School	It is recommended that Haughley Parish Council approach Babergh and Mid Suffolk District Councils and/or Suffolk County Council to seek ways to improve the current condition and suitability of Haughley Crawford's School building, recreational facilities and possible integration of the pre-school including the identification of a new suitable site.	No, Category A	No specific recommendations
CND2 King George V Playing Field and Ron Crascall Pavilion	It is recommended that Haughley Parish Council approach Babergh and Mid Suffolk District Councils and/or Suffolk County Council to investigate and actively pursue ways to improve and expand the provision of sports, recreational and social facilities within the King George V Playing Field and Ron Crascall Pavilion.	No, Category A	No specific recommendations
CND3 Cemetery Space	It is recommended that on an annual basis, Haughley Parish Council will review, with advice and guidance from St Mary's Church, any possible requirement for new cemetery space.	No, Category A	No specific recommendations
CND4 Traffic Calming Haughley Crawford's School	It is recommended that Haughley Parish Council approach Babergh and Mid Suffolk District Councils and/or Suffolk County Council concerning the provision of traffic calming measures between Haughley Crawford's School and King George V Playing Field with urgent consideration given to a raised platform pedestrian crossing and moving the 30mph speed limit in Green Road to the north side of the proposed new development east of King George V Playing Field.	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
CND5 Fishponds Way Footpath	It is recommended that the Parish Council will approach Babergh and Mid Suffolk District Councils and/or Suffolk County Council to investigate and actively pursue the upgrading of the footpath and provision of a footpath where none currently exists between Tothill and the Eve Balfour Way junction on Fishponds Way making it suitable for all pedestrians, buggies, wheelchairs, horses and cyclists.	No, Category A	No specific recommendations
CND6 Haughley Green Footpath	It is recommended that the Parish Council will approach Babergh and Mid Suffolk District Councils and/or Suffolk County Council to investigate and actively pursue the provision of a footpath to the side of the road through Haughley Green.	No, Category A	No specific recommendations
CND7 Central Haughley Traffic Flow and Safety	It is recommended that Haughley Parish Council approach Babergh and Mid Suffolk District Councils and/or Suffolk County Council to undertake additional studies to improve traffic flow and safety through the centre of Haughley village, giving consideration to the provision of designated parking areas. In the event of any development within Haughley village, the developer must give consideration to constructively investigate the possibility of creating off-site parking in order to serve facilities.	No, Category A	No specific recommendations

Each of the site allocations identified for residential development in the Haughley Neighbourhood Plan Pre-Submission Document have no potential for impacts on any N2k sites.

#### 4.4.3 Recommendations

There are no recommendations for the site allocation policies in this draft Neighbourhood Plan as they have all been assigned to Category A. There will therefore be no need for any development subsequently coming forward to be subject to a project level HRA and secure sufficient mitigation measures, to avoid a Likely Significant Effect on any N2k sites. As such there is no requirement to progress to Appropriate Assessment.

The in-combination effects from other plans and projects are considered in the following section.

## 4.5 Other Plans and Projects – In-combination Effects

There are no relevant Plan level HRAs that have been carried out by Babergh & Mid Suffolk DCs or other organisations and none have been found to have a likely significant effect on the European sites being assessed.

In the context of this HRA, the relevant other plans to be considered are listed below in combination with Haughley Neighbourhood Plan HRA.

**Table 8: Other plans or projects considered for in combination effects**

Statutory Body	Title of HRA or Project	Findings of HRA or Project	Potential for in combination effects
Mid Suffolk District Council	Core Strategy Habitats Regulations Assessment (Appropriate Assessment) October 2007)	The HRA found no likely significant effects from the Plan on the Breckland SAC/SPA and Waveney and Little Ouse Valley Fens SAC.	It is considered that in combination likely significant effects are not predicted.
St Edmundsbury Borough Council	Core Strategy HRA screening (2010)	The HRA found no potential for in combination effects as no other current plans or projects that are likely to lead to significant effects on the Breckland SAC/SPA or the Waveney and Little Ouse Valley Fens SAC have been identified, or where impacts have been identified they have been adequately mitigated.	It is considered that in combination likely significant effects are not predicted.
Babergh District Council	Habitat Regulations Assessment of Core Strategy 2011	The Core Strategy aims to minimise impacts on the Orwell and Stour estuaries, a European-designated site which supports species that are susceptible to disturbance. The principal potential impact on the European sites as a result of development proposed under the Core Strategy relates to increased recreational pressure.	It is considered that in combination likely significant effects are not predicted.



Statutory Body	Title of HRA or Project	Findings of HRA or Project	Potential for in combination effects
		The Strategy therefore sets out a series of measures to ensure that the policies will not have a significant effect on the European sites.	
Suffolk Coastal District Council	Suffolk Coastal Core Strategy and Development Management Policies Document HRA (2011)		It is considered that in combination likely significant effects are not predicted.

This is due to the Parish of Haughley lying outside the Impact Risk Zone for any N2k sites, this HRA screening concludes that it is possible to rule out likely significant effects. There is therefore no need for an Appropriate Assessment under the Conservation of Habitats and Species Regulations 2017.

#### References

- Atkins (2011) Habitats Regulations Assessment for Babergh District Council Core Strategy
- Habitats Regulations Assessment (Appropriate Assessment) for Mid Suffolk District Council Core Strategy(2007)
- Atkins (2010) St. Edmundsbury Borough Council Core Strategy HRA screening
- Babergh District Council (2014) Local Plan Core Strategy and Policies
- Haughley Neighbourhood Plan 2016-2036 Pre-Submission Plan (May 2018)
- Natural England Conservation objectives for European Sites: East of England Website
- The Landscape Partnership (2011) Suffolk Coastal District Council Habitats Regulations Assessment for Core Strategy and Development Management Policies Document





## 5. Conclusions

### 5.1 Strategic Environmental Assessment (SEA)

---

The Neighbourhood Plan has been prepared for town and country planning purposes and sets a framework for future development consent. The policies of the Neighbourhood Plan can be considered to determine the use of small areas at local level commensurate with their status in determining local planning applications.

It is considered that the Plan may have a significant effect on the environment due to the scale and quantum of growth proposed in relation to the size of the existing settlement and the environmental characteristics of the area. As such, any proposal subsequently coming forward could result in significant effects. Additionally, in regard to the allocation of sites for development purposes, the formal requirements of the SEA Directive have not yet been met including the consideration of alternatives. This is due to the Plan's scheduled progression ahead of that of the Local Plan and therefore any reliance on the Local Plan's Sustainability Appraisal not being applicable until the Local Plan is found sound.

As such, the content of the Haughley Neighbourhood Plan has therefore been **screened in** for its requirement of Strategic Environmental Assessment in line with the requirements of Directive 2001/42/EC. The next step for the Neighbourhood Plan is to undertake a Strategic Environmental Assessment (SEA) to accompany the Neighbourhood Plan, in order to meet this element of the basic conditions test.

### 5.2 Habitats Regulations Assessment (HRA)

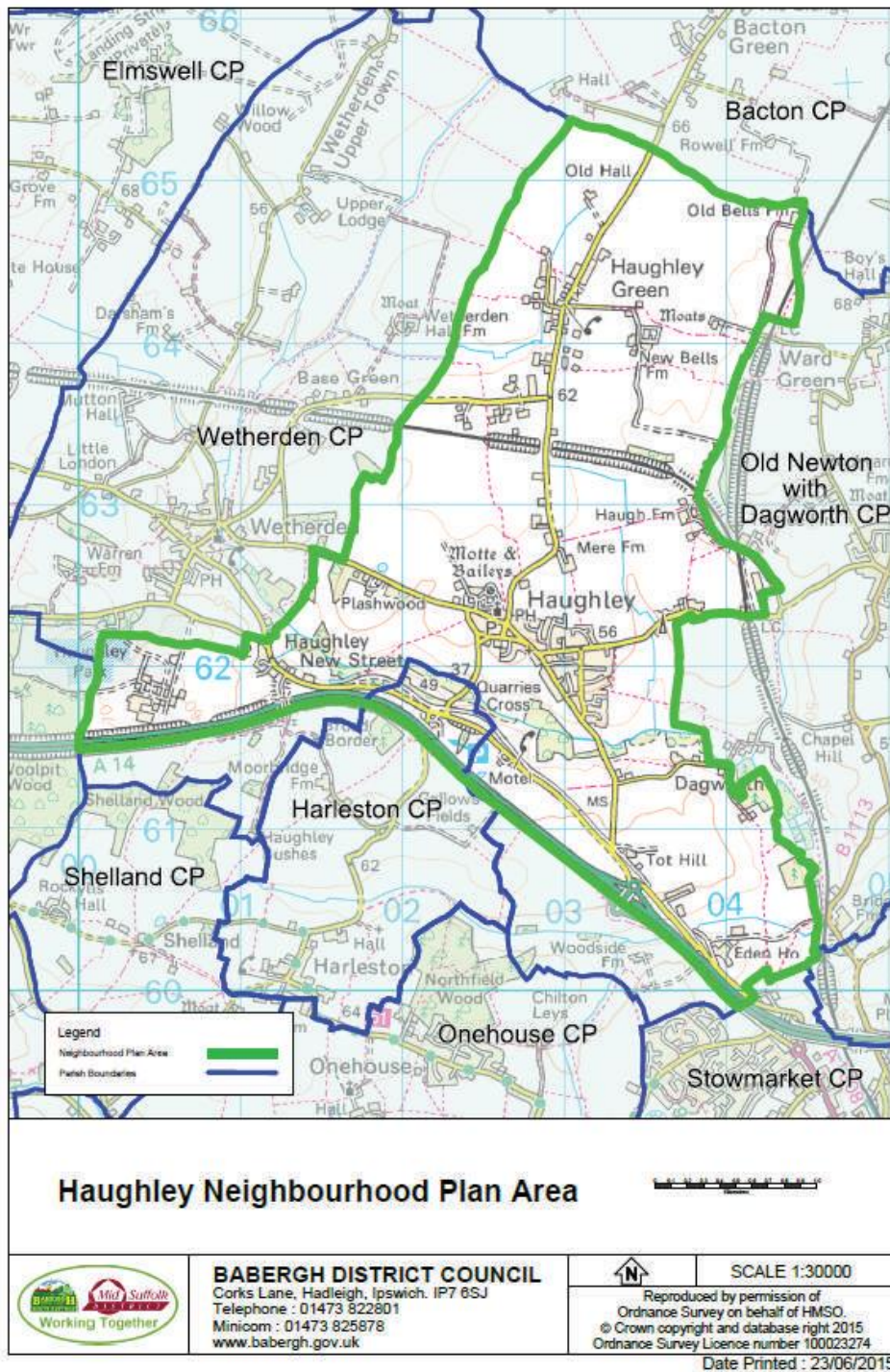
---

Subject to Natural England's review, this HRA screening report indicates that the Haughley Neighbourhood Plan is not predicted to have any likely significant effects on a European site. The requirement for the Plan to undertake further assessment under the Habitats Regulations 2017 is therefore **screened out**.



# Appendix 1

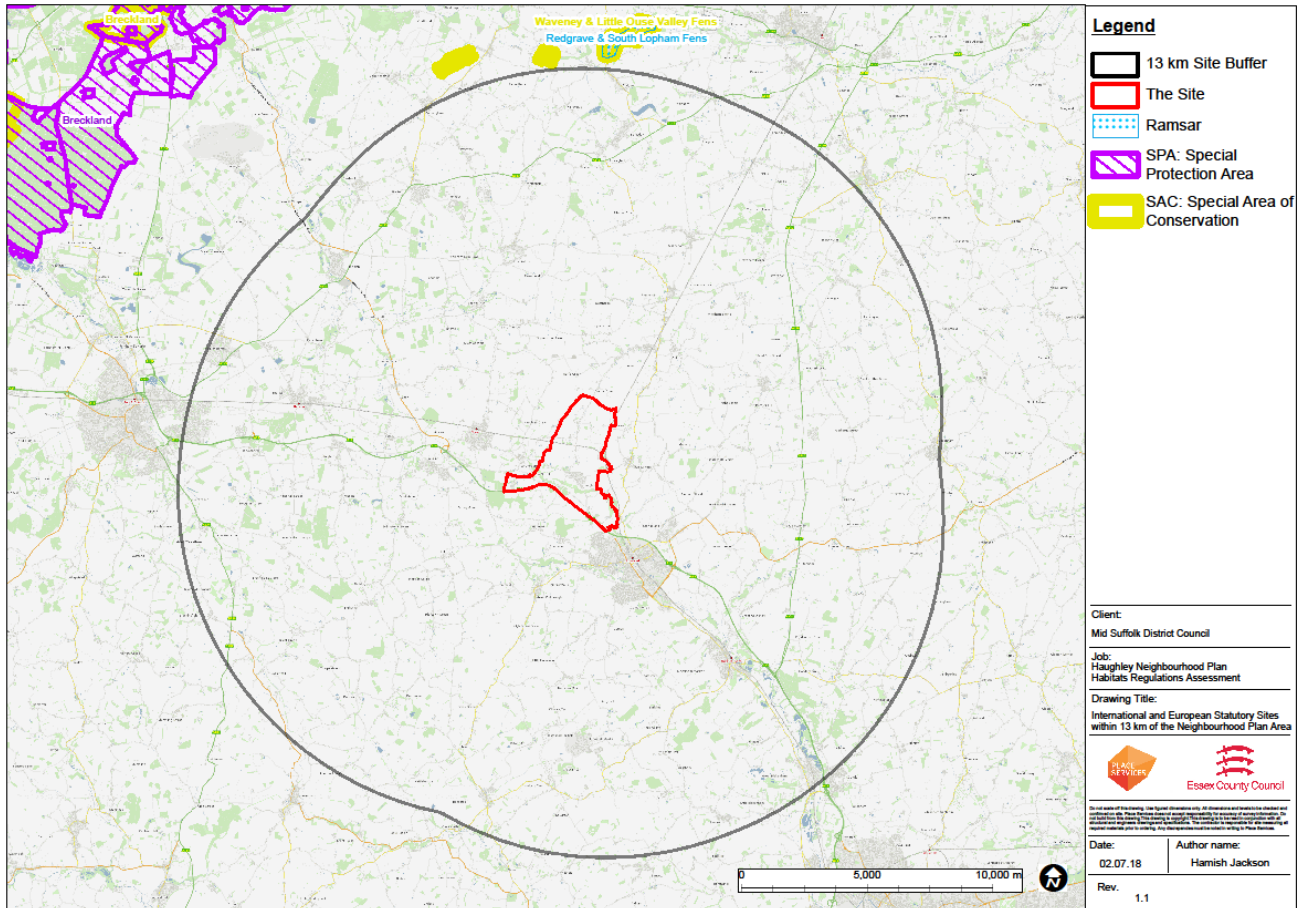
## The Neighbourhood Plan area for Haughley



Source: Mid Suffolk District Council, 2015

# Appendix 2

## Haughley Parish and Locations of the European (Natura 2000) sites within 13km



Source: Place Services, 2018



## Place Services

Essex County Council  
County Hall, Chelmsford, Essex CM1 1QH

T: +44 (0)333 013 6840

E: [enquiries@placeservices.co.uk](mailto:enquiries@placeservices.co.uk)

[www.placeservices.co.uk](http://www.placeservices.co.uk)

July 2018



Essex County Council

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# **Haughley Neighbourhood Plan**

## **Strategic Environmental Assessment Screening Determination**

(Regulation 11 of the Environmental Assessment of Plans and  
Programmes Regulations 2004)

**August 2018**

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# HAUGHLEY NEIGHBOURHOOD PLAN

## STRATEGIC ENVIRONMENTAL ASSESSMENT DETERMINATION

### 1. Introduction

This assessment relates to the Haughley Pre-Submission Neighbourhood Plan 2016-2036, dated May 2018.

In some circumstances a neighbourhood plan could have significant environmental effects and may fall within the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 and require a strategic environmental assessment.

One of the basic conditions that will be tested by the independent examiner is whether the making of the Plan is compatible with European Union obligations. Whether a neighbourhood plan requires a strategic environmental assessment and the level of detail needed will depend on what is proposed in the draft Neighbourhood Plan and the characteristics of the local area.

The vision of the Haughley Neighbourhood Plan is that by 2036 Haughley Parish will be a connected, viable and attractive rural area with a strong heritage and community spirit. It will have a range of homes and essential public services (including high speed broadband connection) that meet the growing needs of the community and are in keeping with the area. The natural and historic environment will be protected and enhanced. Haughley Parish will be a safe and sustainable rural community where people want to live and use into the future.

A SEA/HRA Screening Report for the Plan has been prepared by Essex Place Services on behalf of Mid Suffolk District Council and Haughley Parish Council. This can be viewed at: [www.midsuffolk.gov.uk/HaughleyNP](http://www.midsuffolk.gov.uk/HaughleyNP)

The statutory consultees were consulted in July 2018 and their responses are attached. (See Appendix).

Section 2 sets out the legislative background. Section 3 sets out the criteria for determining the likely significance of effects. Section 4 summarises the assessment and Section 5 sets out the conclusions based on the screening assessment and the responses of the statutory consultees. The determination is set out in Section 6.

### 2. Legislative Background

European Union Directive 2001/42/EC requires a Strategic Environmental Assessment to be undertaken for certain types of plans or programmes that would have a significant environmental effect. The Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations) require that this is determined by a screening process, which should use a specified set of criteria (set out in Schedule 1 of the Regulations). The results of this process must be set out in a SEA Screening Statement, which must be publicly available.



In accordance with Regulation 9 of the SEA Regulations 2004, Haughley Parish Council (the qualifying body) requested Mid Suffolk District Council (MSDC) as the responsible authority, to determine whether an environmental report on the emerging Haughley Neighbourhood Plan is required due to significant environmental effects. In making this determination, MSDC should have regard to Schedule 1 of the Regulations.

Pre-Submission Consultation (Regulation 14 stage) was carried out in June and July 2018. In line with the advice contained within the National Planning Policy Framework (NPPF) and Planning Practice Guidance, the plan's potential scope should be assessed at an early stage against the criteria set out in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004. As indicated above Mid Suffolk DC therefore commissioned Essex Place Services to prepare a screening report to assess whether a SEA would be required.

A SEA can be required in some limited situations where a sustainability appraisal is not needed. Neighbourhood Planning is one of these situations. Sustainability Appraisals (SAs) may incorporate the requirements of the Strategic Environmental Assessment Regulations, which implement the requirements of the 'Strategic Environmental Assessment Directive' on the assessment of the effects of certain plans and programmes on the environment.

A Sustainability Appraisal ensures that potential environmental effects are given full consideration alongside social and economic issues and it is good practice to do one to understand how a plan is to deliver sustainable development. However, NPPF Planning Practice Guidance states that there is no legal requirement for a neighbourhood plan to undertake a sustainability appraisal as set out in section 19 of the Planning and Compulsory Purchase Act 2004. It is down to the qualifying body to demonstrate whether its plan is likely to have significant environmental effects. This is the purpose of the SEA Screening Report.

### **3. Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC**

Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC are set out in the following table:

<p>1. The characteristics of plans and programmes, having regard, in particular, to:</p> <ul style="list-style-type: none"><li>- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,</li><li>- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy</li><li>- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development,</li><li>- environmental problems relevant to the plan or programme,</li><li>- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).</li></ul> <p>2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:</p>
--

- the probability, duration, frequency and reversibility of the effects,
- the cumulative nature of the effects,
- the trans-boundary nature of the effects,
- the risks to human health or the environment (e.g. due to accidents),
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
- the value and vulnerability of the area likely to be affected due to:
  - special natural characteristics or cultural heritage,
  - exceeded environmental quality standards or limit values,
  - intensive land-use,
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

*Source: Annex II of SEA Directive 2001/42/EC*

#### **4. Assessment**

A full assessment of the likely effects of the Plan is set out in the Screening Report prepared by Essex Place Services which can be viewed at:

<https://www.midsuffolk.gov.uk/assets/Neighbourhood-Planning/Haughley-NP-HRA-SEA-Screening-Report-Jul18.pdf>

In the light of the assessment the Screening Report concludes that the Neighbourhood Plan may have a significant effect on the environment due to the scale and quantum of growth proposed in relation to the size of the existing settlement and the environmental characteristics of the area. As such, any proposal subsequently coming forward could result in significant effects. Additionally, in regard to the allocation of sites for development purposes, the formal requirements of the SEA Directive have not yet been met including the consideration of alternatives.

#### **5. Conclusion**

The Screening Report for Consultation prepared by Essex Place Services considered that there may be significant environmental effects arising either individually or cumulatively from the draft Haughley Neighbourhood Plan policies and proposals.

As such, the Report concluded that under Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations 2004, the Haughley Neighbourhood Plan requires a SEA to be undertaken.

Consultation on the Screening Report was carried out with Natural England, Historic England and the Environment Agency.

All three bodies agreed with the conclusion of the Screening Report.

The consultation responses are attached at Appendix 1.

## **6. Determination**

In the light of the Screening Report for Consultation prepared by Essex Place Services and the consultation with Historic England, Natural England and the Environment Agency it is determined that a Strategic Environmental Assessment of the Haughley Neighbourhood Plan is required in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004.

Date: 23 July 2018  
Our ref: 251365

Paul Munson  
Mid Suffolk District Council



Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

**BY EMAIL ONLY**

Dear Mr Munson

**HAUGHLEY NEIGHBOURHOOD PLAN - SEA/HRA SCREENING REPORT**

Thank you for your consultation on the above dated 3 July 2018. which was received by Natural England on 3 July 2018.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**Screening Request: Strategic Environmental Assessment and Habitats Regulations Assessment**

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests are concerned (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.

**Neighbourhood Plan**

Guidance on the assessment of Neighbourhood Plans in light of the SEA Directive is contained within the National Planning Practice Guidance. The guidance highlights three triggers that may require the production of an SEA, for instance where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Alice Watson  
Consultations Team



Mr Paul Munson  
Babergh District Council  
Endeavour House Russell Road  
Ipswich  
Suffolk  
IP1 2BX

**Our ref:** AE/2018/123031/01-L01  
**Your ref:** SEA Screening  
**Date:** 27 July 2018

Dear Mr Munson

**SEA SCREENING FOR NHP 2016-2036**

**ENDEAVOUR HOUSE IPSWICH IP1 2BX**

Thank you for consulting us on the 3 July 2018 regarding the SEA screening report.

We have reviewed the screening report as submitted and can confirm that we do not disagree with the conclusions drawn in the report.

We trust this information is useful.

Yours sincerely

**Miss Natalie Kermath**  
**Planning Advisor**

Environment Agency  
Cobham Road, Ipswich, Suffolk, IP3 9JD.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)  
End



Historic England

EAST OF ENGLAND OFFICE

Mr Paul Munson  
Babergh and Mid Suffolk District Councils  
Endeavour House  
8 Russell Road  
Ipswich  
Suffolk  
IP1 2BX

Direct Dial: [REDACTED]

Our ref: PL00459988

20 July 2018

Dear Mr Munson

**RE: Haughley Neighbourhood Plan SEA Screening**

Thank you for your email of 03 July 2018 regarding the above consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome this opportunity to review this screening. For the purposes of this consultation, Historic England will confine its advice to the question, "Is it (the Haughley Neighbourhood Plan) likely to have a significant effect on the historic environment?". Our comments are based on the information supplied with the Screening Opinion.

The Screening Report considers that the Haughley Neighbourhood Plan will not have any significant effects on the historic environment..

On the basis of the information supplied, and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of 'SEA' Directive], Historic England concurs with the Council that the preparation of a Strategic Environmental Assessment is not required.

The views of the other two statutory consultation bodies should be taken into account before the overall decision on the need for an SEA is made.

I should be pleased if you can send a copy of the determination as required by REG 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.

We should like to stress that this opinion is based on the information provided by you with your correspondence dated 03 July 2018. To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SA/SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that, despite the SA/SEA, these would have an adverse effect upon the environment.

Historic England strongly advises that the conservation and archaeological staff of the relevant local authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), how the allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Yours sincerely,  
Edward James  
Historic Places Advisor, East of England

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# Strategic Environmental Assessment for the Haughley Parish Neighbourhood Plan

Scoping Report

Haughley Parish Council's Neighbourhood Plan Working  
Party

October 2018

## Quality information

### Prepared by

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Tamsin Stevens  
Graduate Environmental  
Consultant

### Checked by

---

Nick Chisholm-Batten  
Associate

### Approved by

---

Nick Chisholm-Batten  
Associate

## Revision History

Revision	Revision date	Details	Authorized	Name	Position
V1	10 <sup>th</sup> October 2018	Draft for Neighbourhood Group comment	10 <sup>th</sup> October 2018	Nick Chisholm- Batten	Associate

### Prepared for:

Haughley Parish Council's Neighbourhood Plan Working Party

### Prepared by:

AECOM Infrastructure & Environment UK Limited  
Aldgate Tower  
2 Lemn Street  
London  
E1 8FA  
United Kingdom

aecom.com


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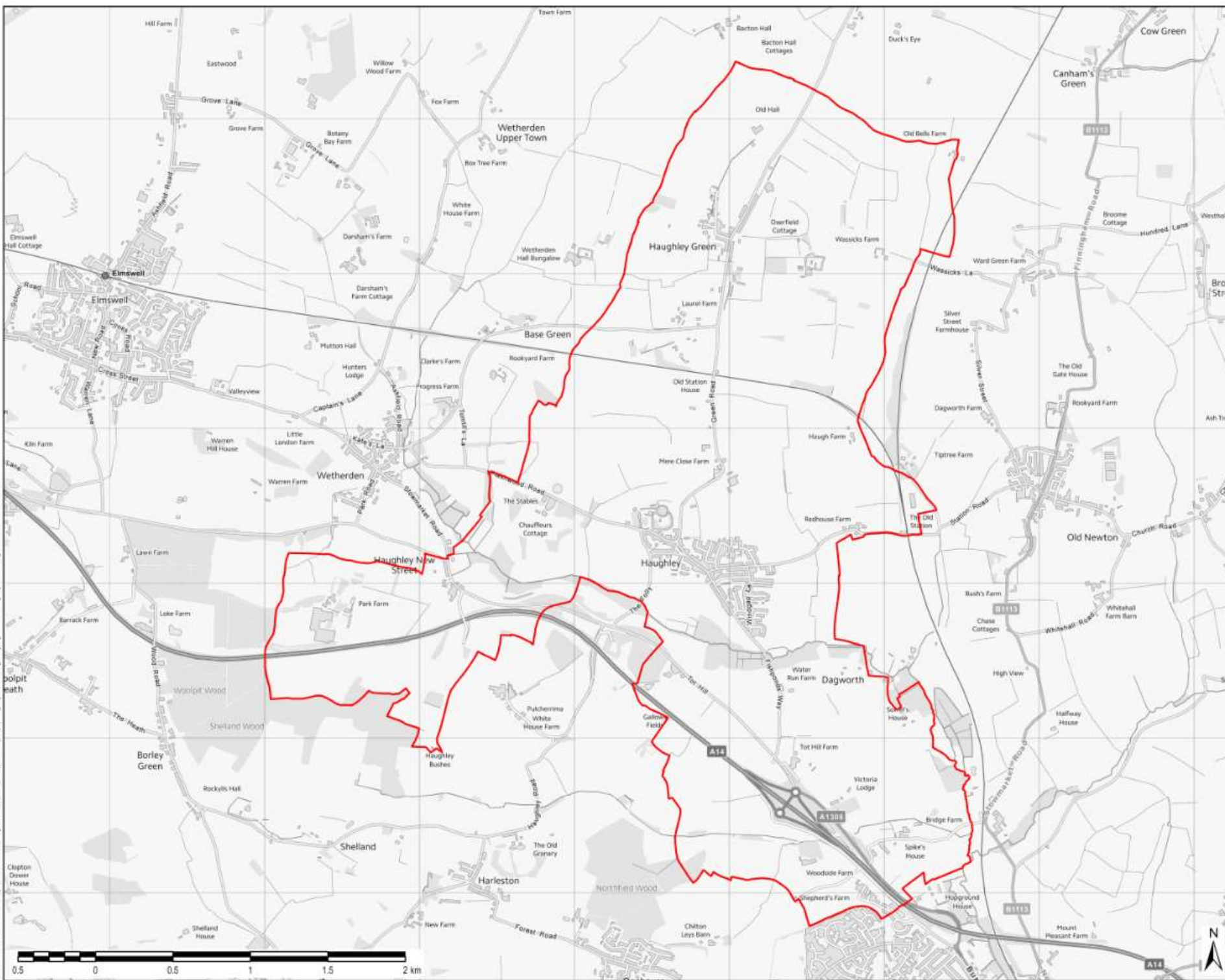
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**LEGEND**

 Haughley Parish Neighbourhood Plan Area



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Project of Issue  
**DRAFT**

Client  
**HAUGHLEY PARISH NEIGHBOURHOOD PLAN WORKING PARTY**

Project Title  
**SEA FOR THE HAUGHLEY PARISH NEIGHBOURHOOD PLAN**

Drawing Title  
**HAUGHLEY PARISH NEIGHBOURHOOD PLAN AREA**

Drawn CN	Checked JW	Approved TG	Date 28/09/2018
AECOM Internal Project No. 60538903		Scale @ A3 1:22,500	

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AECOM  
1000  
Wentworth Drive, San Francisco  
California 94020, USA  
Telephone: (415) 774-3000  
Fax: (415) 774-3000  
www.aecom.com



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# 1. Introduction

## 1.1 Background

AECOM has been commissioned to undertake an independent Strategic Environmental Assessment in support of Haughley Parish's emerging Neighbourhood Plan.

The Haughley Parish Neighbourhood Plan is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan is being prepared in the context of Mid Suffolk's Core Strategy with due regard to the emerging Babergh & Mid Suffolk Joint Local Plan.

It is currently anticipated that the Neighbourhood Plan will be submitted to Mid Suffolk District Council in late 2018.

Key information relating to the Haughley Parish Neighbourhood Plan is presented in Table 1.1.

**Table 1.1: Key facts relating to Haughley Parish Neighbourhood Plan**

Name of Responsible Authority	Haughley Parish Council
Title of Plan	Haughley Parish Neighbourhood Plan
Subject	Neighbourhood planning
Purpose	<p>The Haughley Parish Neighbourhood Plan 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 Mid Suffolk's Core Strategy with due regard to the emerging Babergh &amp; Mid Suffolk Joint Local Plan.</p> <p>The Haughley Parish Neighbourhood Plan will be used to guide and shape development within the Haughley Parish Neighbourhood Plan area.</p>
Timescale	To 2036
Area covered by the plan	The Haughley Parish Neighbourhood Plan area covers the part of Haughley Parish which lies to the north of the A14 and includes part of the Parish of Harleston which is also to the north of the A14 (Figure 1.1).
Summary of content	The Haughley Parish Neighbourhood Plan will set out a vision, strategy and range of policies for the Haughley Parish Neighbourhood Plan area.
Plan contact point	<p>Chris Adams, Haughley Parish Neighbourhood Plan Working Party</p> <p>Email address: <a href="mailto:chrisadams638@btinternet.com">chrisadams638@btinternet.com</a></p>



## 1.2 Relationship of the Haughley Parish Neighbourhood Plan with the Mid Suffolk Core Strategy

The current local planning policy for Haughley is contained in:

- Mid Suffolk Core Strategy (adopted in 2008);
- Mid Suffolk Core Strategy Focused Review (adopted in 2012);
- Stowmarket Area Action Plan (adopted 2013); and
- The “saved” policies of the Mid Suffolk Local Plan (adopted 1998).

Haughley is designated as a Key Service Centre in the Core Strategy settlement hierarchy. Key Service Centres are large villages with a good level of services, which might include:

- A primary and a secondary school within the settlement or easily accessible by public transport;
- Primary health care facilities;
- A range of retail and service provision capable of meeting day-to-day needs, in particular for convenience shopping;
- Local employment opportunities; and
- Frequent public transport to higher order settlements.

Neighbourhood plans are required to be in general conformity with the strategic policies of the Local Plan and can develop policies and proposals to address local place-based issues. An emerging Joint Local Plan is currently being undertaken between Mid Suffolk District Council and Babergh District Council. In this plan, Haughley is considered a ‘Core Village’ due to it having a high level of services and facilities that are judged to be of importance in relation to sustainability and vitality of the local community. The emerging Joint Local Plan is at a relatively early stage and therefore the Core Strategy remains the key policy document for the district. The latest public document of the emerging Joint Local Plan is the Consultation Document which was published in August 2017.<sup>1</sup>

Under the emerging Joint Local Plan, Mid Suffolk has a residual need for new housing between 2017 and 2036 of 5,820 new dwellings. Haughley Parish Council’s Neighbourhood Plan Working Party will examine an appropriate number of housing to be delivered in Haughley Parish through the Neighbourhood Plan.

## 1.3 SEA explained

The Haughley Parish Neighbourhood Plan has been screened in by Mid Suffolk District Council as requiring a Strategic Environmental Assessment (SEA). SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts. Through this approach, the SEA for the Haughley Parish Neighbourhood Plan seeks to maximise the emerging plan’s contribution to sustainable development.

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<sup>1</sup> Babergh & Mid Suffolk District Council (2017) Joint Local Plan: Consultation Document [online] available at: <<https://www.midsuffolk.gov.uk/assets/Strategic-Planning/JLP-Reg-18-Docs/BMSDC-Joint-Local-Plan-Consultation-Documents-August-2017.pdf>> [last accessed 19/09/18]

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SEA is undertaken to meet specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).

Two key procedural requirements of the SEA Regulations are that:

1. When deciding on 'the scope and level of detail of the information' which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues; and
2. A report (the 'Environmental Report') is published for consultation alongside the Draft Plan (i.e. the draft Haughley Parish Neighbourhood Plan) that presents outcomes from the environmental assessment (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.

### This scoping report

This 'Scoping Report' is concerned with item 1 above. It presents a suggested scope for the SEA so that the designated authorities (Historic England, Natural England and the Environment Agency) can provide timely comment.

## 1.4 SEA 'scoping' explained

Developing the draft scope for the SEA as presented in this report has involved the following steps:

1. Defining the broader context for the Haughley Parish Neighbourhood Plan and associated SEA (i.e. EU, UK Government and local policy and commitments), to summarise the regulatory and legislative landscape;
2. Establishing the baseline for the SEA, (i.e. the current and future situation in the area in the absence of the Haughley Parish Neighbourhood Plan, in order to help identify the plan's likely significant effects;
3. Identifying particular problems or opportunities ('issues') that should be a particular focus of the SEA; and
4. Developing a SEA Framework comprising objectives and appraisal questions on the basis of these issues which can then be used to appraise the draft plan.

## 1.5 Structure of this Report

### Key sustainability issues

The outcomes of the scoping elements introduced through steps 1–4 above have been presented under a series of key environmental themes, as follows:

- Air Quality
- Biodiversity
- Climatic Factors (including flood risk)
- Landscape and Historic Environment
- Land, Soil and Water Resources
- Population and Community
- Health and Wellbeing
- Transportation

The selected environmental themes incorporate the 'SEA topics' suggested by Annex I (f) of the SEA Directive<sup>2</sup>. These were refined to reflect a broad understanding of the anticipated scope of plan effects.

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<sup>2</sup> The SEA Directive is 'of a procedural nature' (para 9 of the Directive preamble) and does not set out to prescribe particular issues that should and should not be a focus, beyond requiring a focus on 'the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors' [our emphasis]

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It is intended that presenting the scoping information under these themes will help enable the reader to easily locate the information of greatest interest to them. Once agreed (i.e. subsequent to consultation on this Scoping Report), the suggested scope presented under eight themes will provide a methodological 'framework' for the environmental assessment of the draft plan and reasonable alternatives. The discussion of the scoping information for each theme is presented in Sections 2 to 9.

### SEA Framework to assess policy proposals

The SEA Framework provides a way in which environmental effects can be defined and subsequently analysed based on standard 'tests'. Each proposal within the emerging Haughley Parish Neighbourhood Plan will be assessed consistently using the framework.

The SEA objectives and appraisal questions proposed for the Haughley Parish Neighbourhood Plan SEA are presented under each of the themes in Sections 2 to 9.



## 2. Air Quality

### Focus of Theme:

- Air pollution sources
- Air quality hotspots
- Air quality management

### 2.1 Headline Sustainability Issues

- Air quality in the Neighbourhood Plan area is good, with no significant issues identified.
- There are no Air Quality Management Areas (AQMAs) within the Neighbourhood Plan area or within Mid Suffolk District, as highlighted in the 2016 Local Air Quality Management (LAQM) Annual Status Report.
- Housing and employment growth have the potential to increase emissions and reduce air quality in the area.

**Due to the absence of any significant air quality issues within the Neighbourhood Plan area, air quality has been scoped out for the purposes of the SEA process.**

### 2.2 Policy Context

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

- *'Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.'*
- *'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.'*
- 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'<sup>3</sup> 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.

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<sup>3</sup> HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf) [accessed 29/08/18]

## 2.3 Baseline Summary

### 2.3.1 Summary of Current Baseline

Mid Suffolk District Council is required to monitor air quality across the district under Section 82 of the Environment Act (1995), report regularly to Defra and take action where nationally set levels are likely to be exceeded. Monitoring is undertaken to assess levels of nitrogen dioxide (NO<sub>2</sub>), sulphur dioxide, ozone, benzene and particulates. Where exceedances exist, areas are declared as Air Quality Management Areas (AQMAs) and local authorities are required to produce an Air Quality Action Plan (AQAP) to improve air quality in the area.

As of September 2016, there are no Air Quality Management Areas (AQMAs) within the Neighbourhood Plan area or in the wider Mid Suffolk district, as highlighted in the 2016 Local Air Quality Management (LAQM) Annual Status Report<sup>4</sup>. The concentration of nitrogen dioxide (NO<sub>2</sub>) has reduced within the Mid Suffolk District between 2010 and 2015.

### 2.3.2 Summary of Future Baseline

Whilst no significant air quality issues currently exist within the Haughley Parish Neighbourhood Plan area, new housing and employment provision within the Parish and the wider area, including through the emerging Joint Local Plan, has the potential for adverse effects on air quality through increasing traffic flows and associated levels of pollutants such as NO<sub>2</sub>. However, baseline levels of air pollutants are low within the area and as such significant issues are not currently anticipated.

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<sup>4</sup> Babergh and Mid Suffolk District Council (2016): 'LAQM Annual Status Report', [online] available at: <<https://www.babergh.gov.uk/assets/Environment/2016-Annual-Status-Report.pdf>> last accessed [19/09/18]

### 3. Biodiversity

#### Focus of Theme:

- Nature conservation designations
- Habitats
- Species
- Geodiversity

#### 3.1 Headline Sustainability Issues

- There are no European or nationally designated sites for biodiversity and/or geodiversity located within or adjacent to the Neighbourhood Plan area.
- Gallowsfield Wood is a County Wildlife Site located in the Neighbourhood Plan area.
- There are Biodiversity Action Plan (BAP) priority habitats present in the Neighbourhood Plan area including patches of coastal and floodplain grazing marsh, and deciduous woodland.

#### 3.2 Policy Context

At the European level, the EU Biodiversity Strategy<sup>5</sup> 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:

- One of the three overarching objectives of the NPPF is an environmental objective to *'contribute to protecting and enhancing our natural, built and historic environment'* including by *'helping to improve biodiversity.'*
- *'Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value[...], take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.'*
- *'Planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with the statutory status or identified quality in the development plan); and minimising impacts on and providing net gains for biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures.'*
- *'To protect and enhance biodiversity and geodiversity, plans should:*
  - a) *Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
  - b) *Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.'*

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<sup>5</sup> 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](http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP_resolution_april2012.pdf) > last accessed [27/06/18]

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The Natural Environment White Paper (NEWP)<sup>6</sup> 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 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 people'*<sup>7</sup>.

The recently published 25 Year Environment Plan<sup>8</sup> 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; and
- Protecting and improving the global environment.

In this context, 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' directly relate to the Biodiversity SEA theme.

At the local level, a key objective of the Mid Suffolk Core Strategy<sup>9</sup> is 'to protect, manage, enhance and restore the landscape, biodiversity and geodiversity of the District'. Policy CS 5 of the Strategy: Mid Suffolk's Environment also relates to the Biodiversity SEA theme.

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<sup>6</sup> 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 [19/09/18]

<sup>7</sup> 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 [19/09/18]

<sup>8</sup> HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf) [accessed 19/09/18]

<sup>9</sup> Mid Suffolk District (2008) Core Strategy Development Plan Document [online] available at: <<https://www.midsuffolk.gov.uk/assets/CIL-and-S106-Documents/Pre-Adoption-Documents-Mid-Suffolk/Core-Strategy-with-CSFR-label-and-insert-sheet-07-01-13.pdf>> [last accessed 19/09/18]

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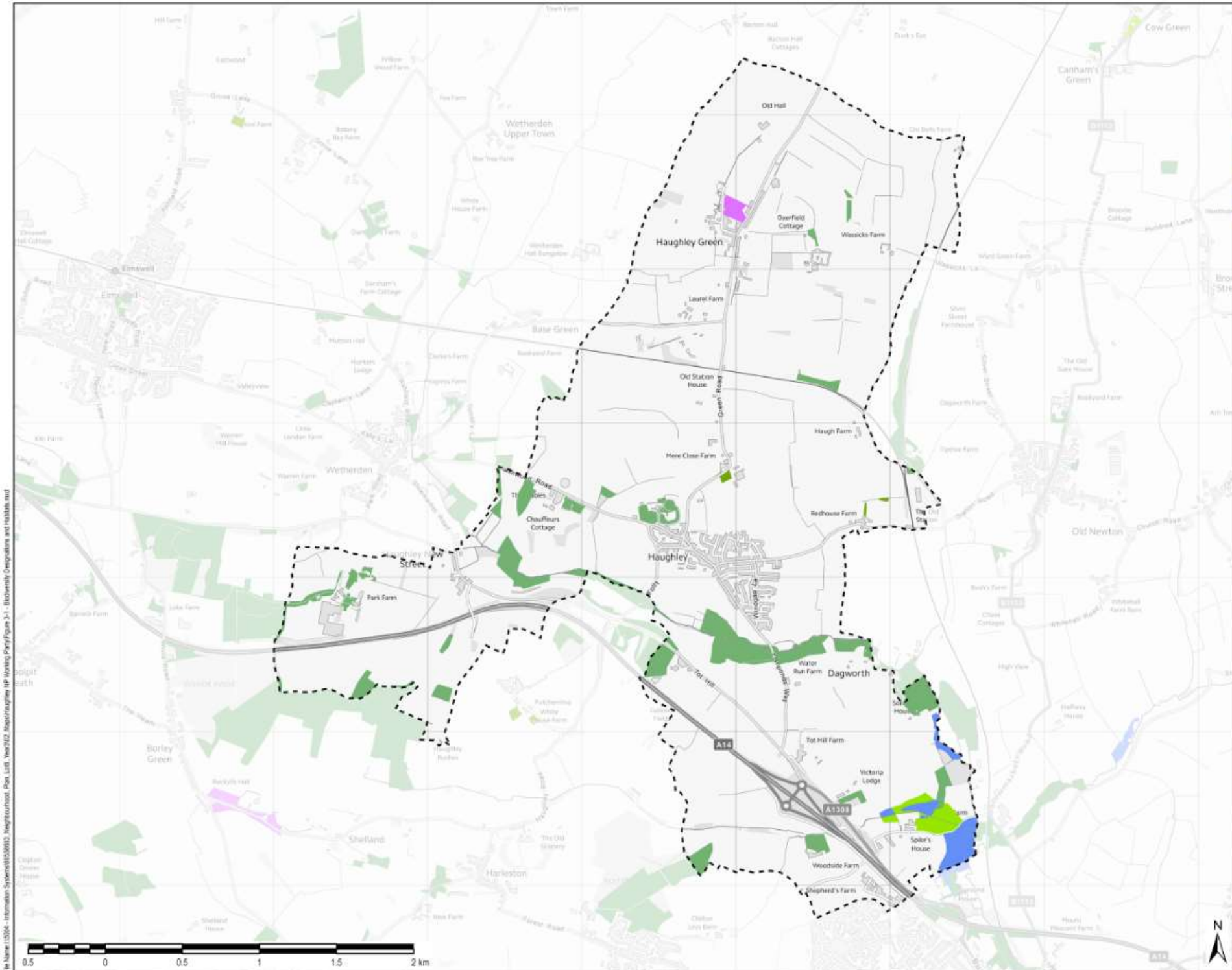
### 3.3 Baseline Summary

There are no nationally or internationally designated biodiversity sites located within or adjacent to the Neighbourhood Plan area. There also no SSSI impact risk zones covering the Neighbourhood Plan area.

There is one County Wildlife Site within the Parish which is Gallowsfield Wood consisting of 20 acres of woodland and open space just north of the A14.

Other locally important sites include a network of BAP priority habitats. A small patch of good quality semi-improved grassland lies in the north of the Parish next to Shrub Farm. Coastal and floodplain grazing marsh and lowland meadows lie on the south east border of the Parish next to the River Rat. Deciduous woodland is scattered throughout the Parish, but predominantly in the southern half of the Parish. There is also a small patch of Good Quality Semi-improved Grassland in the north of the Parish. In the south east, some lowland meadows and coastal and floodplain grazing marsh are present.

Figure 3.1 shows the features of biodiversity interest which are located within or adjacent to the Neighbourhood Plan area.



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**LEGEND**

- Haughley Parish Neighbourhood Plan Area
- Biodiversity Action Plan Priority Habitats
- Coastal and Floodplain Grazing Marsh
- Deciduous Woodland
- Good Quality Semi-improved Grassland
- Lowland Meadows
- Traditional Orchard

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Purpose of Issue **DRAFT**

Client **HAUGHLEY PARISH NEIGHBOURHOOD PLAN WORKING PARTY**

Project Title **SEA FOR THE HAUGHLEY PARISH NEIGHBOURHOOD PLAN**

Drawing Title **BIODIVERSITY DESIGNATIONS AND HABITATS**

Drawn CN	Checked JW	Approved NCB	Date 28/03/2018
AECOM Internal Project No. 60638803		Scale @ A3 1:22,500	

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AECOM  
Bentley House  
Bentley Park, Mansfield  
Leicestershire, NG21 3EP  
Telephone: 01529 312000  
The AECOM Group  
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### 3.3.1 Summary of Future Baseline

Habitats and species will potentially face increasing pressures from future development within the Neighbourhood Plan area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change, which has the potential to lead to changes in the distribution and abundance of species and changes to the composition and character of habitats.

Benefits for biodiversity have the potential to arise from the increasing integration of biodiversity considerations within decision making through policies within the Local Plan and local initiatives for biodiversity enhancements.

## 3.4 What are the SEA objectives and appraisal questions for the Biodiversity SEA theme?

SEA objective	Assessment Questions
Protect and enhance all biodiversity and geological features.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Support the status of the locally designated sites of significance within and/or adjacent to the Neighbourhood Plan area boundary, including Gallowsfield Wood?</li> <li>• Protect and enhance semi-natural habitats?</li> <li>• Protect and enhance priority habitats, and the habitat of priority species?</li> <li>• Achieve a net gain in biodiversity?</li> <li>• Support enhancements to multifunctional green infrastructure networks?</li> <li>• Support access to, interpretation and understanding of biodiversity and geodiversity?</li> </ul>

## 4. Climate Change

### Focus of Theme:

- Contribution to climate change
- Effects of climate change
- Climate change adaptation
- Flood risk

### 4.1 Headline Sustainability Issues

- Any increases in the built footprint of the Neighbourhood Plan area (associated with the delivery of new housing and employment land) has the potential to increase overall greenhouse gas emissions in the Parish.
- The total CO<sub>2</sub> emissions per capita within Mid Suffolk District are broadly higher than the regional and national totals.
- There are areas of land adjacent to the River Rat and its tributaries which are located within Flood Risk Zone 3, and as such, have a >1% chance of being flooded each year.
- Within the Neighbourhood Plan area, there are corridors of land at medium-high risk of surface water and sewer flooding.
- The Haughley Parish Neighbourhood Plan should seek to increase the resilience of the Neighbourhood Plan area to the effects of climate change by supporting and encouraging adaptation strategies.

### 4.2 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 below<sup>10</sup>:

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

The UK Climate Change Act<sup>11</sup> 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

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<sup>10</sup> 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 [20/09/18]

<sup>11</sup> GOV.UK (2008): 'Climate Change Act 2008', [online] accessible via <<http://www.legislation.gov.uk/ukpga/2008/27/contents>> last accessed [19/09/18]



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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:

- 2050 Target. 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 page 12.

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

- One of the three overarching objectives of the NPPF is an environmental objective to '*contribute to protecting and enhancing our natural, built and historic environment*' including by '*mitigating and adapting to climate change*' and '*moving to a low carbon economy.*' *'The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.'*
- '*Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.'*
- '*Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.'*
- Direct development away from areas at highest risk of flooding (whether existing or future). '*Where development is necessary, it should be made safe for its lifetime without increasing flood risk elsewhere.'*

The Flood and Water Management Act<sup>13</sup> 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);
- 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;

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<sup>12</sup> 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 [19/09/18]

<sup>13</sup> Flood and Water Management Act (2010) [online] available at: <<http://www.legislation.gov.uk/ukpga/2010/29/contents>> last accessed [19/09/18]

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- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
- Creating sustainable drainage systems (SuDS).<sup>14</sup>

Further guidance is provided in the document 'Planning for SuDS'.<sup>15</sup> 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'.

At the local level, the following policies within the Mid Suffolk Core Strategy<sup>16</sup> directly relate to the Climate Change SEA theme:

- Policy CS 3: Reduce contributions to Climate Change
- Policy CS 4: Adapting to Climate Change

## 4.3 Baseline Summary

### 4.3.1 Summary of Current Baseline

#### *Contribution to Climate Change*

In relation to greenhouse gas emissions, source data from the Department of Energy and Climate Change suggests that Mid Suffolk has higher per capita emissions to the East of England and England as a whole since 2005 (see Table 4.1). Mid Suffolk has also seen a 31.9% reduction in the percentage of total emissions per capita between 2005 and 2016, lower than the reductions for the East of England (33.3%) and England (37.6%).

**Table 4.1: Carbon dioxide emissions and sources, plus emissions per capita, 2005-2016<sup>17</sup>**

	Industrial and Commercial (t CO <sub>2</sub> )	Domestic (t CO <sub>2</sub> )	Transport (t CO <sub>2</sub> )	Total (t CO <sub>2</sub> )
<b>Mid Suffolk</b>				
2005	3.6	2.7	3.3	9.4
2006	3.4	2.7	3.3	9.2
2007	3.3	2.6	3.3	8.8
2008	3.1	2.5	3.0	8.3
2009	2.9	2.3	2.9	7.8
2010	3.0	2.5	2.9	8.1
2011	2.9	2.2	2.7	7.5
2012	2.9	2.3	2.7	7.6

<sup>14</sup> 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.

<sup>15</sup> 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](http://www.ciria.org/Resources/Free_publications/Planning_for_SuDS_ma.aspx)> last accessed [19/09/18]

<sup>16</sup> Mid Suffolk District (2008) Core Strategy Development Plan Document [online] available at: <<https://www.midsuffolk.gov.uk/assets/CIL-and-S106-Documents/Pre-Adoption-Documents-Mid-Suffolk/Core-Strategy-with-CSFR-label-and-insert-sheet-07-01-13.pdf>> [last accessed 19/09/18]

<sup>17</sup> Department of Energy and Climate Change (2018) 2005 to 2016 UK local and regional CO<sub>2</sub> emissions – data tables [online] available to download via: <<https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2016>> last accessed [19/09/18]

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	Industrial and Commercial (t CO <sub>2</sub> )	Domestic (t CO <sub>2</sub> )	Transport (t CO <sub>2</sub> )	Total (t CO <sub>2</sub> )
2013	2.8	2.2	2.7	7.3
2014	2.6	1.8	2.7	6.7
2015	2.5	1.7	2.8	6.7
2016	2.2	1.6	2.8	6.4
<b>East</b>				
2005	3.0	2.5	2.6	8.1
2006	3.0	2.5	2.6	8.0
2007	2.9	2.4	2.6	7.8
2008	2.8	2.4	2.4	7.6
2009	2.5	2.2	2.3	6.9
2010	2.6	2.3	2.3	7.2
2011	2.3	2.0	2.2	6.5
2012	2.5	2.1	2.2	6.8
2013	2.3	2.1	2.2	6.5
2014	2.0	1.7	2.2	5.9
2015	1.9	1.7	2.3	5.7
2016	1.6	1.6	2.3	5.4
<b>England</b>				
2005	3.8	2.5	2.3	8.5
2006	3.8	2.5	2.2	8.4
2007	3.6	2.4	2.2	8.1
2008	3.5	2.4	2.1	7.8
2009	3.0	2.1	2.0	7.0
2010	3.0	2.3	2.0	7.2
2011	2.7	2.0	1.9	6.5
2012	2.9	2.1	1.9	6.8
2013	2.8	2.0	1.9	6.6
2014	2.4	1.7	1.9	5.9
2015	2.3	1.6	1.9	5.7

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	Industrial and Commercial (t CO <sub>2</sub> )	Domestic (t CO <sub>2</sub> )	Transport (t CO <sub>2</sub> )	Total (t CO <sub>2</sub> )
2016	2.0	1.5	1.9	5.3

*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) team<sup>18</sup>. 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 scenario<sup>19</sup> 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. These include:

- Effects on water resources from climate change;
- Reduction in availability of groundwater for abstraction;
- 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;
- A need to increase the capacity of wastewater treatment plants and sewers;
- A need to upgrade flood defences;
- 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.

<sup>18</sup> The data was released on 18th June 2009: See: <<http://ukclimateprojections.metoffice.gov.uk/>> last accessed [19/09/18]

<sup>19</sup> UK Climate Projections (2014) East 2050s Medium Emissions Scenario [online] available at: <<http://ukclimateprojections.metoffice.gov.uk/23954?emission=medium>> last accessed [19/09/18]

Flood Risk

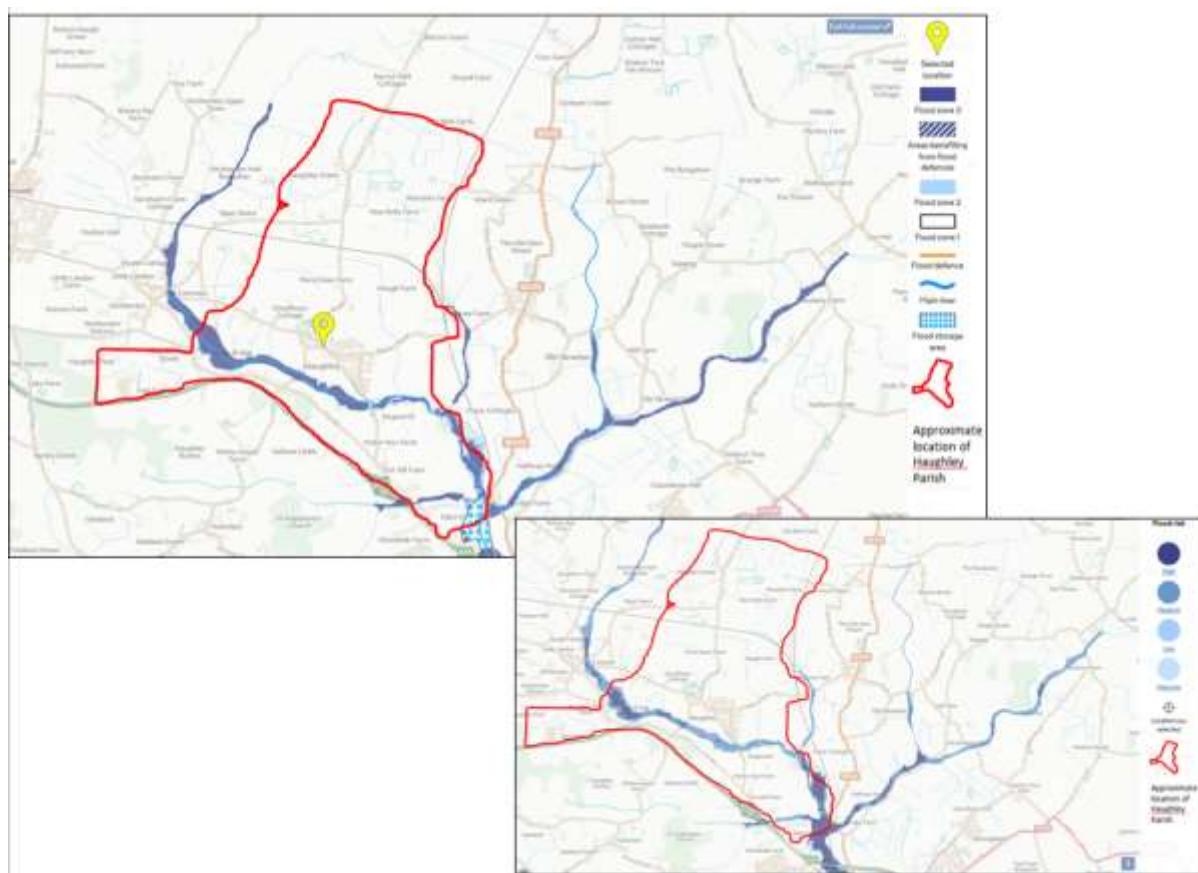


Figure 4.1: Fluvial flood risk within the Neighbourhood Plan area<sup>20</sup>

The areas at highest risk of flooding in the Neighbourhood Plan area are those near the River Rat which are in Flood Zone 3. The River Rat is a tributary of the River Gipping. Flood Zone 3 is of a high probability of flooding; representing that there is a 1% (1 in 100) or greater chance of flooding happening each year. Figure 4.1 (above) displays the flood risk areas present in the Neighbourhood Plan area.

Surface water drainage and sewer flooding is a risk for some parts of the Neighbourhood Plan area, with sections of medium-high risk predominantly located around the River Rat and its tributaries (Figure 4.2). The 2008 SFRA also highlights that it is possible for Haughley to experience flooding from pluvial, sewer and groundwater sources.

<sup>20</sup> GOV UK (2017): 'Flood Map for Planning', [online] available to access via: <<https://flood-map-for-planning.service.gov.uk/>> last accessed [20/09/18]



Figure 4.2: Surface water flood risk within the Neighbourhood Plan area<sup>21</sup>

### 4.3.2 Summary of 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.

A Critical Drainage Area (CDA) is a discrete geographic area where multiple and interlinked sources of flood risk causes flooding in one or more Local Flood Risk Zones (LFRZ) during severe weather, impacting people, property and/or local infrastructure. Mid Suffolk District Council may wish to designate their own CDAs (in the absence of any designations from the Environment Agency)<sup>22</sup> within the Neighbourhood Plan area within the future, for reasons such as surface water capacity issues.

In terms of climate change contribution, per capita greenhouse gas emissions generated in the Neighbourhood Plan area may continue to decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies. However, increases in the built footprint of the Neighbourhood Plan area would contribute to increases in the absolute levels of greenhouse gas emissions.

<sup>21</sup> GOV UK (2017): 'Long term flood risk assessment for locations in England', [online] available to access from: <<https://flood-warning-information.service.gov.uk/long-term-flood-risk/>> last accessed [20/09/18]

<sup>22</sup> GOV.UK (2017): 'Flood Risk Assessment in Flood Zone 1 and Critical Drainage Areas', [online] available to access via: <<https://www.gov.uk/guidance/flood-risk-assessment-in-flood-zone-1-and-critical-drainage-areas>> last accessed [20/09/18]



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## 4.4 What are the SEA objectives and appraisal questions for the Climate Change SEA theme?

SEA objective	Assessment Questions
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"> <li>• Reduce the number of journeys made?</li> <li>• Reduce the need to travel?</li> <li>• Promote the use of sustainable modes of transport, including walking, cycling and public transport?</li> <li>• Increase the number of new developments meeting or exceeding sustainable design criteria?</li> <li>• Generate energy from low or zero carbon sources?</li> <li>• Reduce energy consumption from non-renewable resources?</li> </ul>
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"> <li>• Ensure that inappropriate development does not takes place in areas at higher risk of flooding, taking into account the likely future effects of climate change?</li> <li>• Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change?</li> <li>• Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)?</li> <li>• Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan area?</li> <li>• Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?</li> </ul>

## 5. Landscape and Historic Environment

### Focus of Theme:

- Landscape and townscape character and quality
- Designated and non-designated sites and areas
- Setting of cultural heritage assets
- Archaeological assets

### 5.1 Headline Sustainability Issues

- Haughley is comprised of four landscape types: ancient plateau claylands, plateau claylands, rolling valley farmlands & furze and wooded valley meadows.
- There are a variety of heritage assets within the Neighbourhood Plan area, including a scheduled monument, one Grade I, 65 Grade II and two Grade II\* listed buildings.
- The Haughley Conservation Area covers a significant part of the village.

### 5.2 Policy Context

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

- *'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty [...]. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.'*
- *Strategic policies should set out an overall strategy making provision for 'conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.'*
- *Planning policies and decisions should ensure that developments 'are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).'*
- *'Planning policies and decisions should contribute to and enhance the natural and local environment by:*
  - a) *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils*
  - b) *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and*
  - c) *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.'*
- *Strategic policies should set out an overall strategy making provision for 'conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.'*



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- Planning policies and decisions should ensure that developments *'are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).'*
- 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.
- Plans should set out a *'positive strategy'* for the *'conservation and enjoyment of the historic environment'*, including those heritage assets that are most at risk.
- *'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss of less than substantial harm to its significance.'*

The policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and 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 England<sup>23</sup> 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.

At the local level, a key objective of the Mid Suffolk Core Strategy<sup>24</sup> is to 'protect, manage, enhance and restore the historic heritage / environment and the unique character and identity of the towns and villages by ensuring that new developments are appropriate in terms of scale and location in the context of settlement form and character'. The following policies in the Strategy also directly relate to the Landscape and Historic Environment SEA theme:

- Policy CS 2: Development in the Countryside and Countryside Villages
- Policy CS 5: Mid Suffolk's Environment

## 5.3 Baseline Summary

### 5.3.1 Summary of Current Baseline

#### Landscape

The Neighbourhood Plan area is not located within or adjacent to a National Park or an Area of Outstanding Natural Beauty, and does not contain any Green Belt land.

#### National Character Areas

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. The Neighbourhood Plan area is located in two NCAs: the northern half of the Neighbourhood Plan area lies across South Norfolk and High Suffolk Claylands NCA and the

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<sup>23</sup> 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](http://webarchive.nationalarchives.gov.uk/http://www.culture.gov.uk/reference_library/publications/6763.aspx)> last accessed [20/0918]

<sup>24</sup> Mid Suffolk District (2008) Core Strategy Development Plan Document [online] available at: <<https://www.midsuffolk.gov.uk/assets/CIL-and-S106-Documents/Pre-Adoption-Documents-Mid-Suffolk/Core-Strategy-with-CSFR-label-and-insert-sheet-07-01-13.pdf>> [last accessed 19/09/18]

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southern half lies across South Suffolk and North Essex Clayland NCA. The following characteristics are particularly relevant for the Neighbourhood Plan area.

### NCA Profile 83: South Norfolk and High Suffolk Claylands<sup>25</sup>

- Views are frequently open, only sometimes confined by hedges and trees, with some woodland present. The small valleys support quite confined landscapes with intimate views;
- Scattered areas of ancient woodland, game copses, shelterbelts, valley floor plantation and carr woodland as well as hedgerow trees provide a treed landscape character, despite much boundary loss;
- A mix of remnant medieval ancient countryside, some of it with a decidedly coaxial character, although irregular field patterns and large modern amalgamated open fields dominate;
- Sinuous field boundaries are formed by deep ditches, some with hedgerows and hedgerow trees; and
- A dispersed settlement pattern of small nucleated market towns with architectural variety and colour, loosely clustered villages and scattered hamlets. Settlement is often focused around large medieval greens. Many of the market towns have modern extensions.

### NCA Profile 86: South Suffolk and North Essex Clayland<sup>26</sup>

- An undulating chalky boulder clay plateau is dissected by numerous river valleys, giving a topography of gentle slopes in the lower, wider valleys and steeper slopes in the narrower upper parts;
- The agricultural landscape is predominantly arable with a wooded appearance. There is some pasture on the valley floors. Field patterns are irregular despite rationalisation, with much ancient countryside surviving. Field margins support corn bunting, cornflower and brown hare;
- There is a dispersed settlement pattern of scattered farmsteads, parishes and small settlements around 'tyes' (commons) or strip greens and isolated hamlets. The NCA features a concentration of isolated moated farmsteads and numerous well-preserved medieval towns and large villages;
- Winding, narrow and sometimes sunken lanes are bounded by deep ditches, wide verges and strong hedgerows. Transport infrastructure includes the A14, A12, M11 and Stansted Airport; and
- A strong network of public rights of way provides access to the area's archetypal lowland English countryside.

At the local level, Landscape Guidance (2015) was provided by Babergh and Mid Suffolk District Council<sup>27</sup> which described Haughley's landscape to be comprised of ancient plateau claylands consisting of gently rolling arable landscape of clay soils with scattered ancient woodland.

Suffolk County Council carried out a Landscape Character Assessment in 2008 and was updated in 2011<sup>28</sup>. Four landscape types cover Haughley: ancient plateau claylands, plateau claylands, rolling valley farmlands & furze, and wooded valley meadows.

Key characteristics of ancient plateau claylands are:

- Flat or gently rolling arable landscape of clay soils dissected by small river valleys;

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<sup>25</sup> Natural England (2014): 'NCA Profile 83: South Norfolk and High Suffolk Claylands (NE544)', [online] available to download via: <<http://publications.naturalengland.org.uk/publication/6106120561098752>> last accessed [20/09/18]

<sup>26</sup> Natural England (2014): 'NCA Profile: 86 South Suffolk and North Essex Clayland (NE515)' [online] available to download via: <<http://publications.naturalengland.org.uk/publication/5095677797335040?category=587130>> last accessed [20/09/18]

<sup>27</sup> Babergh and Mid Suffolk District Council (2015): 'Landscape Guidance' [online] available at: <<https://www.babergh.gov.uk/assets/DM-Planning-Uploads/Joint-Landscape-Guidance-Aug-2015.pdf>> last accessed [20/09/18]

<sup>28</sup> Suffolk County Council (2018) Suffolk Landscape Character Assessment [online] available at <http://www.suffolklandscape.org.uk/> [last accessed 20/09/18]

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- Field pattern of ancient enclosure – random patterns in the south but often co-axial in the north. Small patches of straight-edged fields associated with the late enclosure of woods and greens;
- Dispersed settlement pattern of loosely clustered villages, hamlets and isolated farmsteads of medieval origin; and
- Scattered ancient woodland parcels containing a mix of oak, lime, cherry, hazel, hornbeam, ash and holly.

Key characteristics of ancient plateau claylands are:

- Plateaux of heavy clay soil very gently undulating or flat dissected by small streams;
- Ancient organic pattern of fields, some co-axial in the north-east;
- Substantial hedges of hawthorn blackthorn and elm with oak and ash predominant hedgerow trees; and
- Dispersed settlement, villages with multiple nuclei, landscape scattered with farmsteads and hamlets.

Key characteristics of rolling valley farmlands & furze are:

- Valleys with prominent river terraces of sandy soil;
- Small areas of gorse heathland in a clayland setting; and
- Mixed hedgerows of hawthorn, dogwood and blackthorn with oak, ash and field maple.

Key characteristics of wooded valley meadows are:

- Flat narrow valley floors;
- Wet clay and peat soils;
- Small meadows bounded by ditches or hedges; and
- Carr woodland and scrub.

### Historic Environment

Scheduled monuments are sites of national importance and protected by the Ancient Monuments and Archaeological Areas Act 1979. According to the National Heritage List for England<sup>29</sup>, there is one scheduled monument (Haughley Castle) located towards the centre of the Neighbourhood Plan area.

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. The Neighbourhood Plan area contains two Grade I, one Grade II\* and 80 Grade II listed buildings. The Grade I listed buildings are 'Haughley Park and Attached Garden Walls on Three Sides' towards the south west of the Neighbourhood Plan Area and 'Church of St Mary the Virgin' towards the centre of the Neighbourhood Plan area. Grade II\* building is 'New Bells Farmhouse' located towards the north of the Neighbourhood Plan area.

Conservation Areas are designated because of their special architectural and historic interest<sup>30</sup>. 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

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<sup>29</sup> Historic England: National Heritage List for England: <<http://list.historicengland.org.uk>> last accessed [20/09/2018]

<sup>30</sup> Historic England (2017): 'Conservation Areas', [online] available to download via: <<https://historicengland.org.uk/listing/what-is-designation/local/conservation-areas/>> last accessed [20/09/18]

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Historic England<sup>31</sup>. Ideally, appraisals should be regularly reviewed as part of the management of the Conservation Area, and can be developed into a management plan.

A Conservation Area appraisal was undertaken for Haughley in 2008. There is a Conservation Area present in Haughley which surrounds Haugley village centre and includes Old Street, The Green, Duke Street, Bacton Road and The Folly. The location of the Conservation Area is shown on Figure 5.1. The Conservation Area was originally designated by East Suffolk County Council in 1972 and inherited by Mid Suffolk District Council at its inception in 1974. 32 of the listed buildings are located within the Conservation Area. The majority of these buildings are of houses and farms of a domestic scale, mainly timber-framed and rendered. Also within the Conservation Area are sites of archaeological interest which include ring ditches, the Parish churchyard and two moated sites. The Norman Motte and Bailey of Haughley Castle with its moat at the north-west end of the village are also present in the Conservation Area.

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I and Grade II\* listed buildings, scheduled monuments, historic parks and gardens, registered battlefields, wreck sites and Conservation Areas deemed to be 'at risk'. The register does not include Grade II listed buildings. The 2016 Heritage at Risk Register for East England<sup>32</sup> shows that ten historic features in the entirety of the Mid Suffolk District are at risk, none of which are within the boundaries of the Neighbourhood Plan area.

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.

Figure 5.1 (overleaf) shows the and designated historic environment assets located within the Neighbourhood Plan area.

### 5.3.2 Summary of 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.

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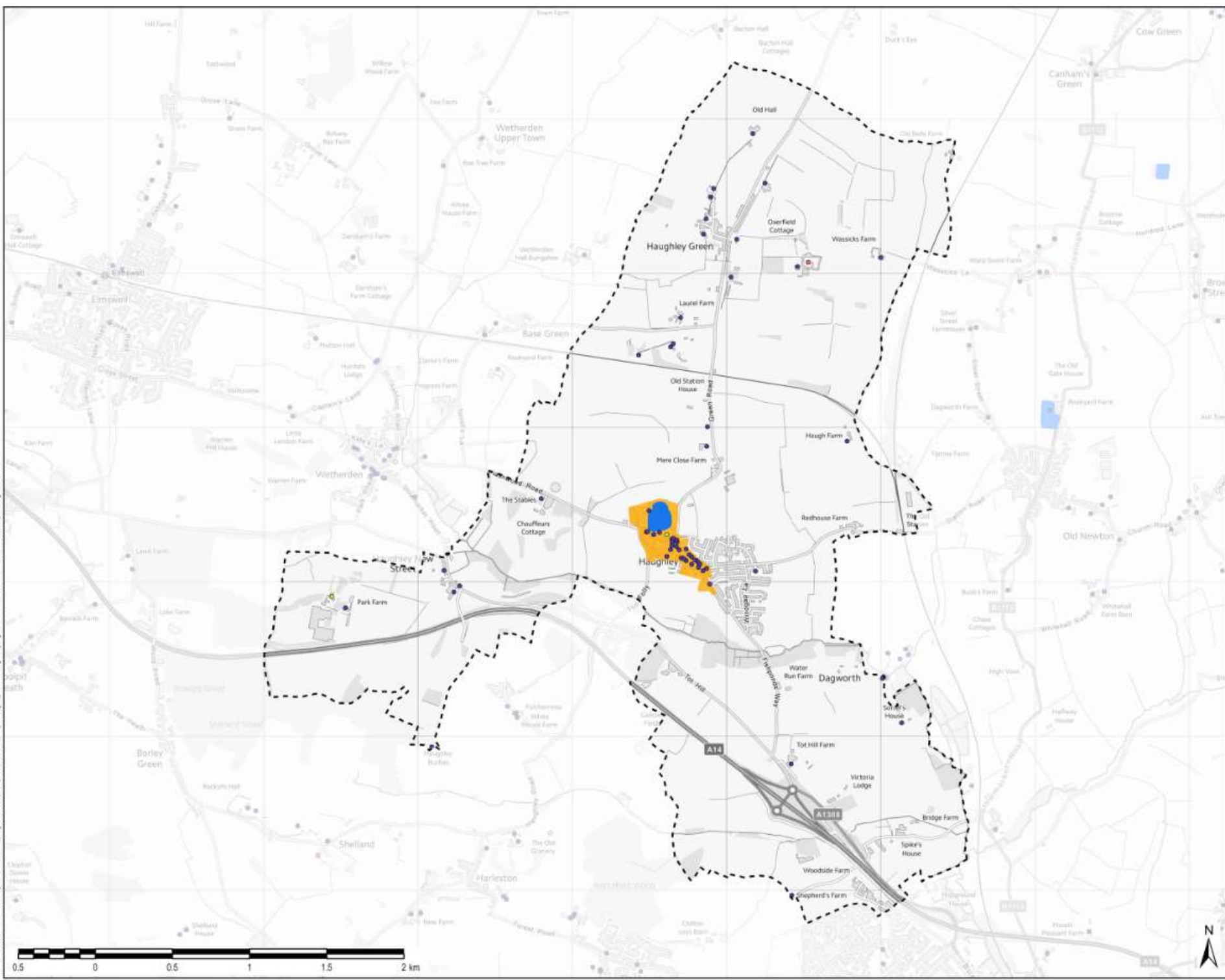
<sup>31</sup> Historic England (2016): 'Conservation Area Designation, Appraisal and Management Advice Note 1', [online] available to download from: <<https://www.historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>> last accessed [20/09/18]

<sup>32</sup> Historic England (2016): 'Heritage at Risk 2016 Register –East', [online] available to download via: <<https://www.historicengland.org.uk/images-books/publications/har-2016-registers/>> last accessed [20/09/18]

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## 5.4 What are the SEA objectives and appraisal questions for the Landscape and Historic Environment SEA theme?

SEA objective	Assessment Questions
Protect, maintain and enhance the cultural heritage resource within the Neighbourhood Plan area, including the historic environment and archaeological assets.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Conserve and enhance buildings and structures of architectural or historic interest?</li> <li>• Conserve and enhance the setting of the Haughley Conservation Area?</li> <li>• Support the integrity of the historic setting of key buildings and features of cultural heritage interest?</li> <li>• Conserve and enhance local diversity and character?</li> <li>• Support access to, interpretation and understanding of the historic environment?</li> </ul>
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"> <li>• Support landscape character reflecting the sensitivities of the four landscape types covering the Neighbourhood Plan area?</li> <li>• Conserve and enhance landscape and townscape features?</li> </ul>



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

**LEGEND**

- Haughley Parish Neighbourhood Plan Area
- Listed building
  - Grade I
  - Grade II
  - Grade II\*
- Record of Scheduled Monument
- Conservation Area

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Purpose of Issue: **DRAFT**

Client: **HAUGHLEY PARISH NEIGHBOURHOOD PLAN WORKING PARTY**

Project Title: **SEA FOR THE HAUGHLEY PARISH NEIGHBOURHOOD PLAN**

Drawing Title: **HISTORIC ENVIRONMENT AND LANDSCAPE DESIGNATIONS**

Drawn CM	Checked JW	Approved NCB	Date 28/03/2018
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NECOM  
 10th Floor  
 10000 Lakeside Drive, Suite 1000  
 Lakeside, SC21 1NP  
 Telephone: 01755 10000  
 Fax: 01755 10001  
 www.necom.co.uk

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Of: **01**

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## 6. Land, Soil and Water Resources

### Focus of Theme:

- Soils resource
- Waste management
- Watercourses
- Water availability
- Water quality

### 6.1 Headline Sustainability Issues

- Land in the Neighbourhood Plan area has been classified as Grade 2 and Grade 3 agricultural land based on Pre-1988 Agricultural Land Classification. In this context Grade 2 can be considered as land classified as the best and most versatile.
- The River Rat flows through the southern section of the Neighbourhood Plan area and eventually joins the River Gipping.

### 6.2 Policy Context

The EU's Soil Thematic Strategy<sup>33</sup> presents a strategy for protecting soil 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 NPPF include:

- *'Planning policies and decisions should contribute to and enhance the natural and local environment by:*
  - a) *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; and*
  - b) *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'*
- 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'.

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<sup>33</sup> European Commission (2006) Soil Thematic Policy [online] available at: <[http://ec.europa.eu/environment/soil/index\\_en.htm](http://ec.europa.eu/environment/soil/index_en.htm)> last accessed [29/06/18]

- *'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.'*
- *'Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.'*
- Planning policies and decisions should *'give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs', and 'promote and support the development of under-utilised land and buildings.'*
- Taking a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.
- Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.
- The government has produced a separate plan that specifically deals with planning policy in relation to waste management; this should be read in conjunction with the NPPF.

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 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 England<sup>34</sup>, which sets out a vision for soil use in England, and the Water White Paper<sup>35</sup>, 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 England<sup>36</sup> recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.

At the local level, a key objective of the Mid Suffolk Core Strategy<sup>37</sup> is to 'seek to improve water quality and reduce pollution to the wider environment'. Policy CS 4: Adapting to Climate Change in the Strategy also directly relates to the Land, Soil and Water Resources SEA theme.

## 6.3 Baseline Summary

### 6.3.1 Summary of 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.

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<sup>34</sup> 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 [20/09/18]

<sup>35</sup> 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 [20/09/18]

<sup>36</sup> 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 [20/09/18]

<sup>37</sup> Mid Suffolk District (2008) Core Strategy Development Plan Document [online] available at: <<https://www.midsuffolk.gov.uk/assets/CIL-and-S106-Documents/Pre-Adoption-Documents-Mid-Suffolk/Core-Strategy-with-CSFR-label-and-insert-sheet-07-01-13.pdf>> [last accessed 20/09/18]



In terms of the location of the best and most versatile agricultural land, a recent detailed classification has not been undertaken for the whole of the Neighbourhood Plan area.

Therefore there is a need to rely on the Pre-1988 Agricultural Land Classification to provide an indication of the land classification for Haughley. The Pre-1988 classification identifies that the Neighbourhood Plan area is predominantly covered by Grade 3 agricultural land, but there are patches of Grade 2 agricultural land present near Haughley village centre<sup>38</sup>. It is unknown at this stage if the Grade 3 land present is grade 3a or 3b. In this context the Grade 2 land in the Neighbourhood Plan area comprises land classified as the best and most versatile, with other areas within the Neighbourhood Plan area potentially being classified as such.

### *Watercourses*

The main watercourse flowing through the Neighbourhood Plan area is the River Rat which is a major tributary of the River Gipping. The River Rat begins to the south of Felsham village and flows through Haughley and joins the River Gipping in Stowmarket.

Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. The zones show the risk of contamination from activities that might cause groundwater pollution in the area. Within the Neighbourhood Plan Area there is a SPZ1 located near Haughley Park in the South West of the boundary. SPZ1 is categorised as the inner zone of an SPZ and is the most vulnerable to contamination and most likely to influence the use of infiltration. Adjacent to this SPZ1 area are areas of SPZ2 and SPZ3 (outer zones). The rest of the Neighbourhood Plan area falls within SPZ3, with a smaller section around the SPZ1 area falling within SPZ2. <sup>41</sup>

## 6.3.2 Summary of Future Baseline

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

In terms of water quality, the requirements of the Water Framework Directive (and its replacement) are likely to lead to continued improvements to water quality in watercourses in the wider area. 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 water bodies.

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<sup>38</sup> Magic Map (2018) available at <https://magic.defra.gov.uk/MagicMap.aspx> [last accessed 20/09/18].

## 6.4 What are the SEA objectives and appraisal questions for the Land, Soil and Water Resources SEA theme?

SEA objective	Assessment Questions
Ensure the efficient and effective use of land.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>Promote the use of previously developed land?</li> <li>Avoid the development of the best and most versatile agricultural land, which in the Parish may comprise Grade 2 and 3a agricultural land?</li> </ul>
Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>Reduce the amount of waste produced?</li> <li>Support the minimisation, reuse and recycling of waste?</li> <li>Maximise opportunities for local management of waste in order to minimise export of waste to areas outside?</li> <li>Encourage recycling of materials and minimise consumption of resources during construction?</li> </ul>
Use and manage water resources in a sustainable manner.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>Support improvements to water quality?</li> <li>Minimise water consumption?</li> <li>Protect sensitive groundwater resources in the Neighbourhood Plan area?</li> </ul>

## 7. Population and Community

### Focus of Theme:

- Population size
- Population density
- Age structure
- Deprivation
- House prices and affordability
- Homelessness
- Education and skills

### 7.1 Headline Sustainability Issues

- The population of Haughley has declined between 2001 and 2011.
- There are a greater proportion of residents within the 60+ age category within the Neighbourhood Plan area in comparison to the regional and national averages.
- In regards to the Index of Multiple Deprivation (IMD) categories, the LSOA that the Neighbourhood Plan area lies in is within the 50% least deprived areas in England.

### 7.2 Policy Context

Key messages from the NPPF include:

- One of the three overarching objectives of the NPPF is a social objective to: *'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.'*
- To support the Government's objective of significantly boosting the supply of housing, strategic policies *'should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'*
- The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site where possible.
- Recognise the important contribution of small and medium sized development sites in meeting housing needs. Local Plans should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, and neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites.
- In rural areas, planning policies and decisions 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.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, open space, 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' and taking a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.

The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change<sup>39</sup> 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.

At the local level, key objectives of the Mid Suffolk Core Strategy<sup>40</sup> are to 'support sustainable communities by locating development where it will enable people to access jobs and key services, such as education, health, recreation and other facilities recognising and respecting the diversity in the function and character of Mid Suffolk's towns, key service centres and primary and secondary villages and countryside' and to 'prepare for an ageing population, including the provision and retention of community facilities and suitable housing, including sheltered and assisted accommodation'. Policy CS 2: Development in the Countryside and Countryside Villages and Policy CS 9: Density and Mix from the Strategy also directly relates to the Population and Community SEA theme.

## 7.3 Baseline Summary

### 7.3.1 Summary of Current Baseline

#### Population

Table 7.1: Population growth 2001-2011<sup>41</sup>

Date	Haughley	Mid Suffolk	East	England
2001	1,710	86,837	5,388,140	49,138,831
2011	1,638	96,731	5,846,965	53,012,456
<b>Population Change 2001-2011</b>	-4.21%	11.39%	8.52%	7.88%

As shown in Table 7.1, the population of Haughley declined between 2001 and 2011. This is in contrast to Mid Suffolk, the East of England and England where the population has increased between 2001 and 2011.

<sup>39</sup> 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 [21/09/18]

<sup>40</sup> Mid Suffolk District (2008) Core Strategy Development Plan Document [online] available at: <<https://www.midsuffolk.gov.uk/assets/CIL-and-S106-Documents/Pre-Adoption-Documents-Mid-Suffolk/Core-Strategy-with-CSFR-label-and-insert-sheet-07-01-13.pdf>> [last accessed 20/09/18]

<sup>41</sup> ONS (no date): Census 2011: Population Density 2011 (Table QS102EW); Population Density 2001 (Table UV02)

### Age Structure

**Table 7.2: Age Structure (2011)<sup>42</sup>**

	Haughley	Mid Suffolk	East	England
<b>0-15</b>	17.0%	18.4%	19.0%	18.9%
<b>16-24</b>	9.8%	9.2%	10.9%	11.9%
<b>25-44</b>	18.5%	22.9%	26.5%	27.5%
<b>45-59</b>	22.0%	21.5%	19.8%	19.4%
<b>60+</b>	32.6%	27.9%	23.9%	22.3%
<b>Total Population</b>	1638	96731	5846965	53,012,456

There are a larger proportion of residents within the 60+ age category within the Neighbourhood Plan area (32.6%) in comparison to the totals for Mid Suffolk (27.9%), the East of England (23.9%) and England (22.3%), as shown in Table 7.2. In contrast, a lower proportion of residents are within the working age categories (25-44 and 45-59) in the Neighbourhood Plan area (40.5%) in comparison to the totals for Mid Suffolk (44.5%), the East of England (46.2%) and England (46.9%). Additionally, 26.9% of residents within the Neighbourhood Plan area are within the younger age categories (0-15 and 16-24), slightly less than the proportions for Mid Suffolk (27.6%), the East of England (29.9%) and England (30.8%).

### Household Deprivation

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

- a) **Employment:** Any person in the household (not a full-time student) that is either unemployed or long-term sick.
- b) **Education:** No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
- c) **Health and Disability:** Any person in the household that has generally 'bad' or 'very bad' health, or has a long term health problem.
- d) **Housing:** The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.

<sup>42</sup> ONS (no date): Census 2011: Age Structure 2011 (Table KS102EW)

Table 7.3: Relative household deprivation dimensions<sup>43</sup>

	Haughley	Mid Suffolk	East	England
<b>Household not deprived</b>	38.4%	48.7%	44.8%	42.5%
<b>Deprived in 1 dimension</b>	37.1%	32.3%	33.0%	32.7%
<b>Deprived in 2 dimensions</b>	21.7%	16.2%	17.9%	19.1%
<b>Deprived in 3 dimensions</b>	2.7%	2.6%	4.0%	5.1%
<b>Deprived in 4 dimensions</b>	0.1%	0.1%	0.4%	0.5%

Based on the information presented in Table 7.3, a higher proportion of households are deprived in 1 or more dimensions within the Neighbourhood Plan area (61.6%) in comparison to Mid Suffolk (51.3%), the East of England (52.2%) and England (57.4%). Out of the 43.8% of households which are deprived in the Neighbourhood Plan area, the majority are deprived in one or two dimensions, which is similar to the regional and national averages.

#### *Index of Multiple Deprivation*

The Index of Multiple Deprivation 2015 (IMD) 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:

- a) **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).
- b) **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.
- c) **Education, Skills and Training:** The lack of attainment and skills in the local population.
- d) **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.
- e) **Crime:** The risk of personal and material victimisation at local level.
- f) **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
  1. 'Geographical Barriers': relating to the physical proximity of local services
  2. 'Wider Barriers': relating to access to housing, such as affordability.
- g) **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
  3. 'Indoors Living Environment' measures the quality of housing.
  4. 'Outdoors Living Environment' measures air quality and road traffic accidents.

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

<sup>43</sup> ONS (no date): Census 2011: 'Households by Deprivation Dimensions 2011 (Table QS119EW)

- a) **Income Deprivation Affecting Children Index:** The proportion of all children aged 0 to 15 living in income deprived families.
- b) **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, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2015, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales (see Table 7.4).

The Neighbourhood Plan area falls within LSOA: Mid Suffolk 006B and is within the 50% least deprived LSOAs in England.

### Housing Tenure

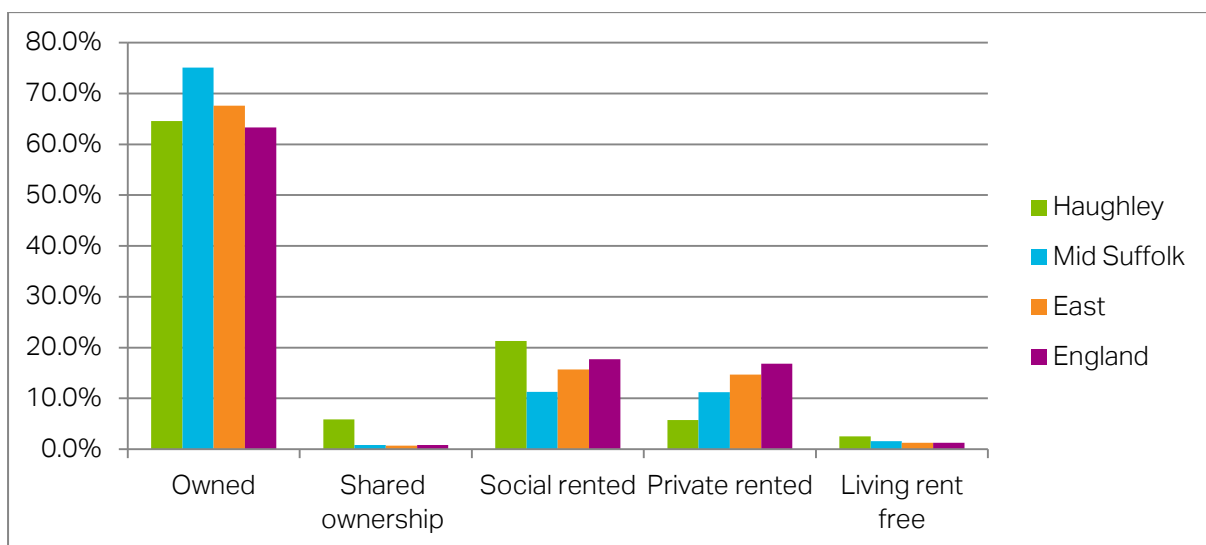


Figure 7.1: 'Tenure by Household' <sup>44</sup>

Within the Neighbourhood Plan area, 64.6% of residents either own their home outright or with a mortgage, lower than the totals for Mid Suffolk (75.1%) and the East of England (67.7%), but broadly aligning with the total for England (63.3%). There are a lower proportion of residents living within privately rented in the Neighbourhood Plan area in comparison to the regional and national trends. Additionally, there are a higher proportion of residents living in social rented accommodation in comparison to Mid Suffolk, East of England and England. The percentage of residents in the Neighbourhood Plan area living in shared ownership accommodation (5.9%) is higher than the totals for Mid Suffolk (0.9%) the East of England (0.7%) and England (0.8%).

### Education

<sup>44</sup> ONS (no date): Census 2011: Tenure-Households 2011 (Table QS405EW)

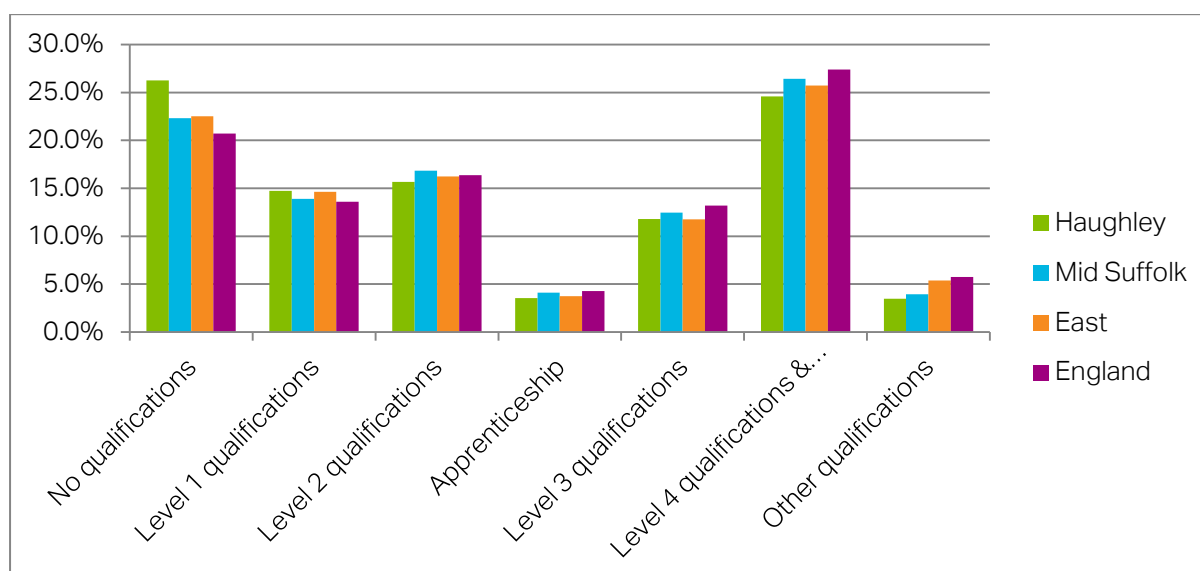


Figure 7.2; 'Highest level of Qualification' <sup>45</sup>

Based on the 2011 census data, 26.3% of residents in the Neighbourhood Plan area have no qualifications, slightly higher than the total for Mid Suffolk (22.3%), the East (22.5%) and England (20.7%). 24.6% of residents within the Neighbourhood Plan area have a Level 4 qualification or above, which is lower than the totals for Mid Suffolk (26.4%) the East of England (25.4%) and England (25.7%).

### Employment

In regards to employment within the Neighbourhood Plan area, the following three occupation categories support the most residents:

- Professional occupations (15.3%);
- Managers, directors, senior officials (15.3%); and
- Skilled trade occupations (13.6%).

Overall, 43.2% of residents within the Neighbourhood Plan area are employed in one of the above three occupation categories, compared with 42.2% for Mid Suffolk, 40.0% in the East of England and 39.7% in England. However, the Neighbourhood Plan area has less 'Associate professional & technical' occupations (11.4%) than Mid Suffolk (13.2%), the East of England (12.9%) and England (12.8%). All other occupation categories are broadly similar to the regional and national trends shown in Figure 7.3 below.

<sup>45</sup> ONS (no date): Census 2011: Highest Level of Qualification 2011 (Table QS501EW)



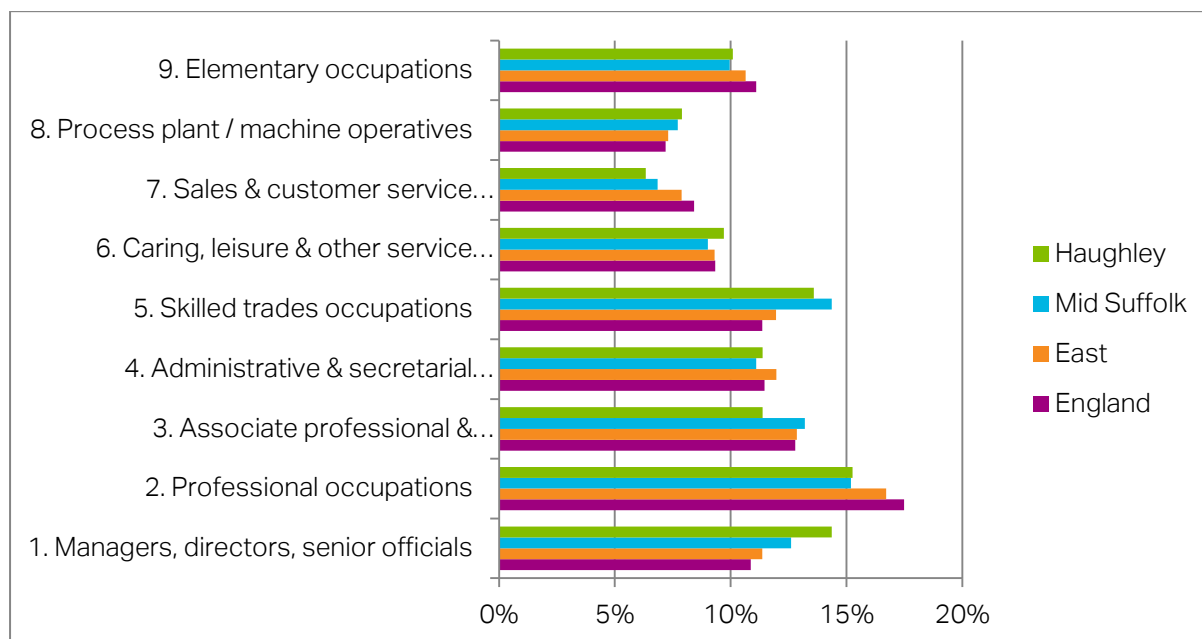


Figure 7.3: 'Occupation of usual residents aged 16 to 74 in employment'<sup>46</sup>

### 7.3.2 Summary of Future Baseline

There are more residents within the 60+ age category within the Neighbourhood Plan area (32.6%) in comparison to the totals for Mid Suffolk (27.9%), the East of England (23.9%) and England (22.3%). As the population continues to age, this has the potential to place pressures on the existing services and facilities within the timeframe of the Neighbourhood Plan. This could negatively impact on the future vitality of the local community and economy.

<sup>46</sup> ONS (no date): Census 2011: 'Occupation 2011' (Table KS608EW)

## 7.4 What are the SEA objectives and appraisal questions for the Population and Community SEA theme?

SEA objective	Assessment Questions
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"> <li>Promote the development of a range of high quality, accessible community facilities?</li> <li>Encourage and promote social cohesion and encourage active involvement of local people in community activities?</li> <li>Minimise fuel poverty?</li> <li>Maintain or enhance the quality of life of existing local residents?</li> </ul>
Reduce deprivation and promote a more inclusive and self-contained community.	<ul style="list-style-type: none"> <li>Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people?</li> <li>Support the provision of land for allotments and cemeteries?</li> </ul>
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"> <li>Support the provision of a range of house types and sizes?</li> <li>Support enhancements to the current housing stock?</li> <li>Meet the needs of all sectors of the community?</li> <li>Provide quality and flexible homes that meet people's needs?</li> <li>Promote the use of sustainable building techniques, including use of sustainable building materials in construction?</li> <li>Provide housing in sustainable locations that allow easy access to a range of local services and facilities?</li> </ul>

## 8. Health and Wellbeing

### Focus of Theme:

- Health indicators and deprivation
- Influences on health and well-being

### 8.1 Headline Sustainability Issues

- 78.3% of residents the Neighbourhood Plan area consider themselves as having 'very good health' or 'good health', lower than the totals for Mid Suffolk (88.1%), the East of England (82.5%) and England (81.4%).
- A higher proportion of residents within the Neighbourhood Plan area report that their activities are limited in some way compared to regional and national averages.

### 8.2 Policy Context

Key messages from the NPPF include:

- One of the three overarching objectives of the NPPF is a social objective to; *'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.'*
- *'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.'*
- Policies and decisions should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
- Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. Development should avoid building on existing open space, sports and recreational buildings and land, including playing fields.
- 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.

In relation to other key national messages in relation to health, Fair Society, Healthy Lives<sup>47</sup> (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 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.

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<sup>47</sup> The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available to download from: < <https://www.nice.org.uk/media/default/About/what-we-do/NICE-guidance/NICE-guidelines/Public-health-guidelines/Additional-publications/Spatial-planning/the-marmot-review-implications-for-spatial-planning.pdf> > last accessed [24/09/18]

At the local level, a key objective of the Mid Suffolk Core Strategy<sup>48</sup> is to 'provide appropriate healthcare for an ageing population; secure independence at home; promote healthy living; deal with the causes and effects of social exclusion; and decrease the number of accidents in the community.'

## 8.3 Baseline Summary

### 8.3.1 Summary of Current Baseline

#### Health Indicators and Deprivation

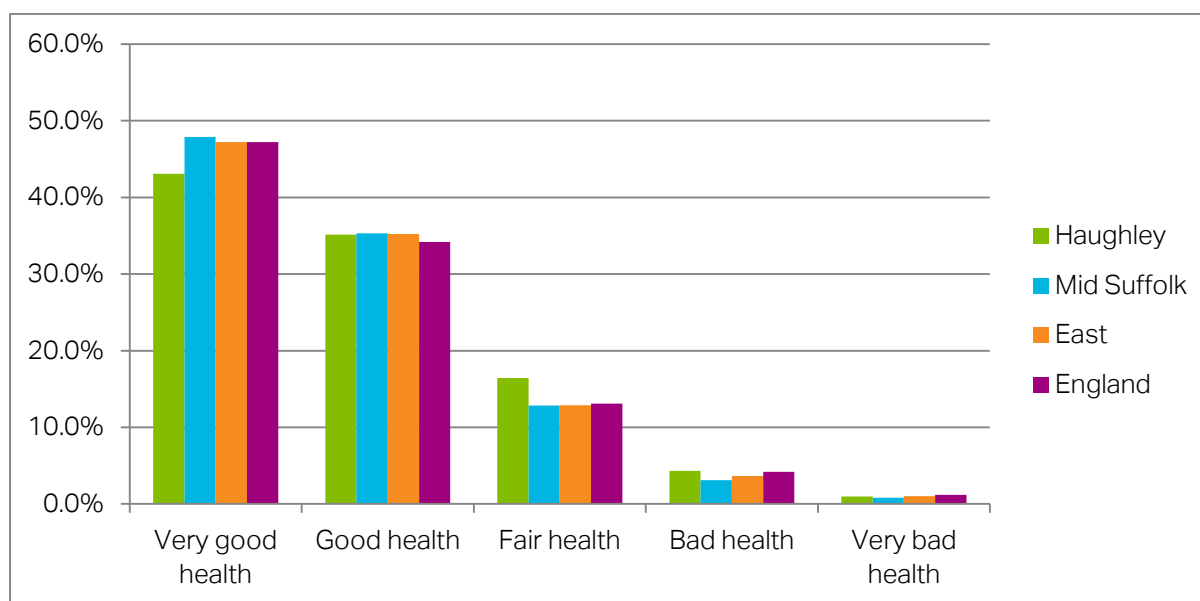


Figure 8.1: 'General Health'<sup>49</sup>

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, 78.3% of residents in the Neighbourhood Plan area consider themselves as having 'very good health' or 'good health', less than the totals for Mid Suffolk (83.2%), the East of England (82.5%) and England (81.4%). Similarly, the percentage of residents in the Neighbourhood Plan area considering themselves to have 'bad health' or 'very bad health' is 5.3%, higher than the total for Mid Suffolk (4.0%), the East of England (4.7%) and England (5.4%).

Table 8.1: Disability<sup>50</sup>

	Haughley	Mid Suffolk	East	England
Activities limited 'a lot'	7.6%	6.7%	7.4%	8.3%
Activities limited 'a little'	13.5%	9.9%	9.3%	9.3%
Activities 'not limited'	79.0%	83.5%	83.3%	82.4%

<sup>48</sup> Mid Suffolk District (2008) Core Strategy Development Plan Document [online] available at: <<https://www.midsuffolk.gov.uk/assets/CIL-and-S106-Documents/Pre-Adoption-Documents-Mid-Suffolk/Core-Strategy-with-CSFR-label-and-insert-sheet-07-01-13.pdf>> [last accessed 20/09/18]

<sup>49</sup> ONS (no date): Census 2011: 'General Health 2011' (Table QS302EW)

<sup>50</sup> ONS (no date): Census 2011: 'Long-term Health Problem or Disability 2011' (Table QS303EW)

The total percentage of residents within the Neighbourhood Plan area who report that their activities are limited 'a little' is higher than the regional and national totals shown in Table 8.1. There are also a slightly higher number of residents within the Neighbourhood Plan area who report that their activities are limited 'a lot' (7.6%) in comparison to Mid Suffolk (6.7%), the East of England (7.4%) and England (8.3%). Overall, 79.0 % of residents in the Neighbourhood Plan area report that their activities are 'not limited', lower than the totals for Mid Suffolk (83.5%), the East of England (83.3%) and England (82.4%).

## Summary of Future Baseline

Health and wellbeing levels within the Neighbourhood Plan area are generally lower than regional and national averages with a lower percentage of residents reporting 'good' or 'very good' health, and a higher percentage of residents reporting that their activities are limited in some way.

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.

## 8.4 What are the SEA objectives and appraisal questions for the Health and Wellbeing SEA theme?

SEA objective	Assessment Questions
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"><li>• Promote accessibility to a range of leisure, health and community facilities, for all age groups?</li><li>• Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards?</li><li>• Reduce noise pollution?</li><li>• Promote the use of healthier modes of travel?</li><li>• Improve access to the countryside for recreational use?</li></ul>

## 9. Transportation

### Focus of Theme:

- Transportation infrastructure
- Traffic flows and congestion
- Accessibility
- Car ownership
- Travel to work

### 9.1 Headline Sustainability Issues

- There is no railway station located within the Neighbourhood Plan area but Stowmarket and Elmswell railway stations are in relatively close proximity to the area.
- There are four principal bus routes which pass through the Neighbourhood Plan area, however they are fairly infrequent and two of them are for school pupils only.
- The Neighbourhood Plan area is well linked to the national road network, with access to the A14, A131, M11 a network of country roads.
- Residents have access to a network of footpaths within the Neighbourhood Plan area.
- There are no national cycle routes located within the Neighbourhood Plan area.
- 81.5% of residents within the Neighbourhood Plan area have access to a car or van.

### 9.2 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.

Key messages from the NPPF include:

- *'Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*
  - a) *The potential impacts of development on transport networks can be addressed*
  - b) *Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised*
  - c) *Opportunities to promote walking, cycling and public transport use are identified and pursued*
  - d) *The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account*
  - e) *Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.'*
- *'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.'*

At the local level, each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan (LTP) through the Local Transport Act 2000, as amended by the Local Transport Act 2008. Implemented by Suffolk County Council, the 'Suffolk LTP 2011-2031'<sup>51</sup> aims to support business and growth with a focus on:

- The challenge of maintaining the highway network in good condition;
- Tackling congestion in the larger towns by more efficient management of traffic, reducing the demand for car travel and promoting more sustainable means of travel;
- Improved connectivity and accessibility in rural areas;
- Seeking improvement to the A11, A12 and A14 trunk roads connecting businesses in Suffolk to each other and to their markets;
- Seeking improvement to the rail network for freight and passengers;
- Relief for our market towns suffering from high levels of through traffic; and
- Recognising that securing high speed broadband throughout Suffolk is very important at present in addressing accessibility and connectivity issues throughout Suffolk and supporting business growth.

At the local level, a key objective of the Mid Suffolk Core Strategy<sup>52</sup> is to 'support and enable public and community transport services and encourage walking and cycling initiatives to provide access to jobs, shops and services and consider new methods of delivering and protecting existing services for smaller communities'. Policy CS 6: Services and Infrastructure also directly relates to the Transportation SEA theme.

## 9.3 Baseline Summary

### 9.3.1 Summary of Current Baseline

#### *Rail Network*

There are no railway stations within the Neighbourhood Plan area. The nearest stations to the Neighbourhood Plan area are Stowmarket which is approximately 1.5 km away from the Neighbourhood Plan area and Elmswell which is approximately 2.1 km away. Stowmarket railway station is on the Great Eastern Main Line which connects directly to London Liverpool Street. Elmswell railway station provides direct links to Cambridge and Ipswich.

#### *Bus Network*

In regards to the bus network<sup>53</sup>, there are four local bus services in operation from the Neighbourhood Plan area providing low frequency services, as outlined below:

- Route 384: Stowmarket – Haughley – Wetherden – Elmswell – Woolpit – Tostock – Beyton – Thurston – East Barton – Cattishall – Bury St Edmunds ; Frequency: 3 journeys on Monday to Saturday Operating: Monday to Saturday.
- Route 385: Stowmarket – Haughley – Wetherden – Elmswell – Woolpit – Tostock – Beyton – Thurston – East Barton – Cattishall – Bury St Edmunds; Frequency: only runs once a day on Monday to Saturday; Operating: Monday to Saturday.

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<sup>51</sup> Suffolk County Council (2011): 'Suffolk LTP 2011-2031: Part 1- Transport Strategy [online] available to access via: <[https://www.ipswich.gov.uk/sites/default/files/scd14\\_combined.pdf](https://www.ipswich.gov.uk/sites/default/files/scd14_combined.pdf)> last accessed [24/09/18]

<sup>52</sup> Mid Suffolk District (2008) Core Strategy Development Plan Document [online] available at: <<https://www.midsuffolk.gov.uk/assets/CIL-and-S106-Documents/Pre-Adoption-Documents-Mid-Suffolk/Core-Strategy-with-CSFR-label-and-insert-sheet-07-01-13.pdf>> [last accessed 24/09/18]

<sup>53</sup> Travel Search (2018): 'Listing of Bus Services from Hau011', [online] available to access via: <<http://www.carlberry.co.uk/rfnlstr.asp?size=F&L1=HAU0110&op=B>> last accessed [24/09/18]

- Route 929: Bury St Edmunds – Rougham – Beyton – Elmswell – Wetherden – Haughley – Stowmarket – Badley – Needham Market – Darmsden – Barham – Gibraltar – Otley (College); Frequency: only runs once a day for the school service: Monday to Friday.
- Route 988: Thurston (Community College) – Beyton – Woolpit – Elmswell – Wetherden – Haughley – Stowmarket Frequency: only runs once a day for the school service: Monday to Friday.

*Road Network and Congestion*

The Neighbourhood Plan area is well connected to the national road network. Key routes are as follows:

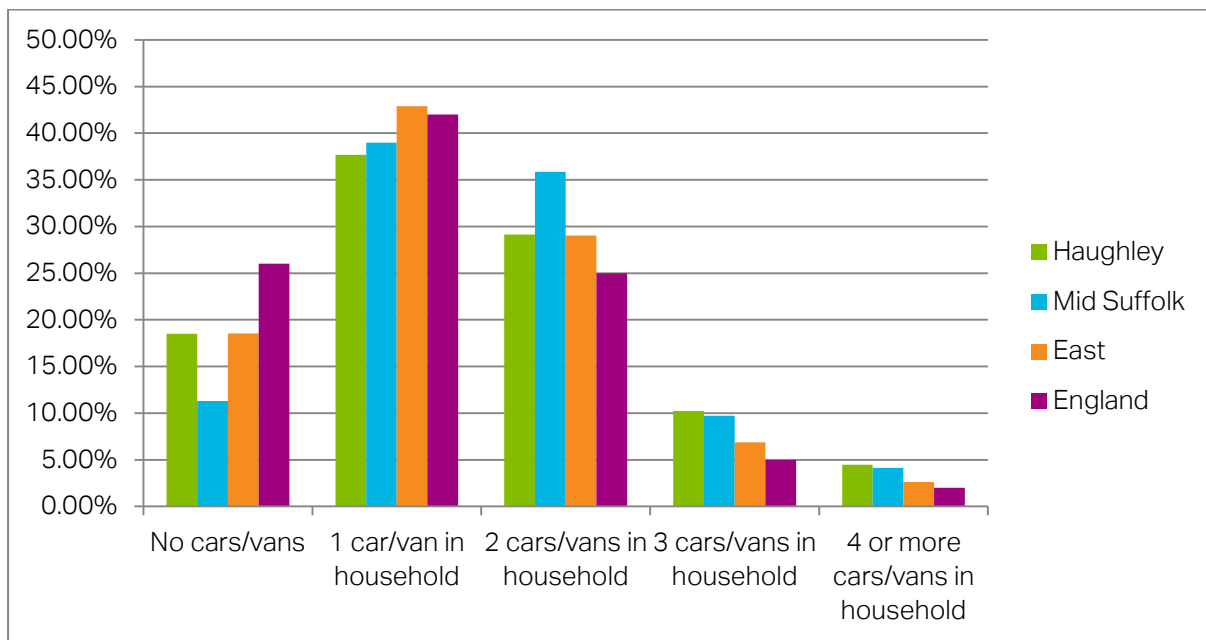
The A14 marks the southern boundary of the Neighbourhood Plan area. This major trunk road links the M1 near Coventry to Kettering, Cambridge, Ipswich and Felixstowe port. West of Haughley is Bury St Edmunds, where the A14 meets the A131 and provides links to Braintree and Chelmsford. The A14 also joins the M11 (via the A11) near Cambridge which links to northeast London.

A network of country roads are present in the Neighbourhood Plan area, including Bacton Road which links north to Bacton and Station Road which links east to Old Newton.

*Cycle and Footpath Network*

There are networks of footpaths which pass through the Neighbourhood Plan area.<sup>54</sup> However, there are no official National Cycle Routes within the Neighbourhood Plan area.

*Availability of Cars and Vans*



**Figure 9.1: 'Car and van ownership'<sup>55</sup>**

Based on the 2011 census data, 81.5% of households in the Neighbourhood Plan area have access to at least one car or van, which is the same as the percentage of the East of England (81.5%), less than the percentages for Mid Suffolk (88.7%) and greater than the percentage for England (74.0%).

<sup>54</sup> Ordnance Survey (2018) 'OS routes near Haughley, Mid Suffolk', [online] available to access via < <https://getoutside.ordnancesurvey.co.uk/local/haughley-mid-suffolk> > last accessed [24/09/2018]

<sup>55</sup> ONS (no date): 'Car or Van Availability 2011', (Table QS416EW)



Travel to Work

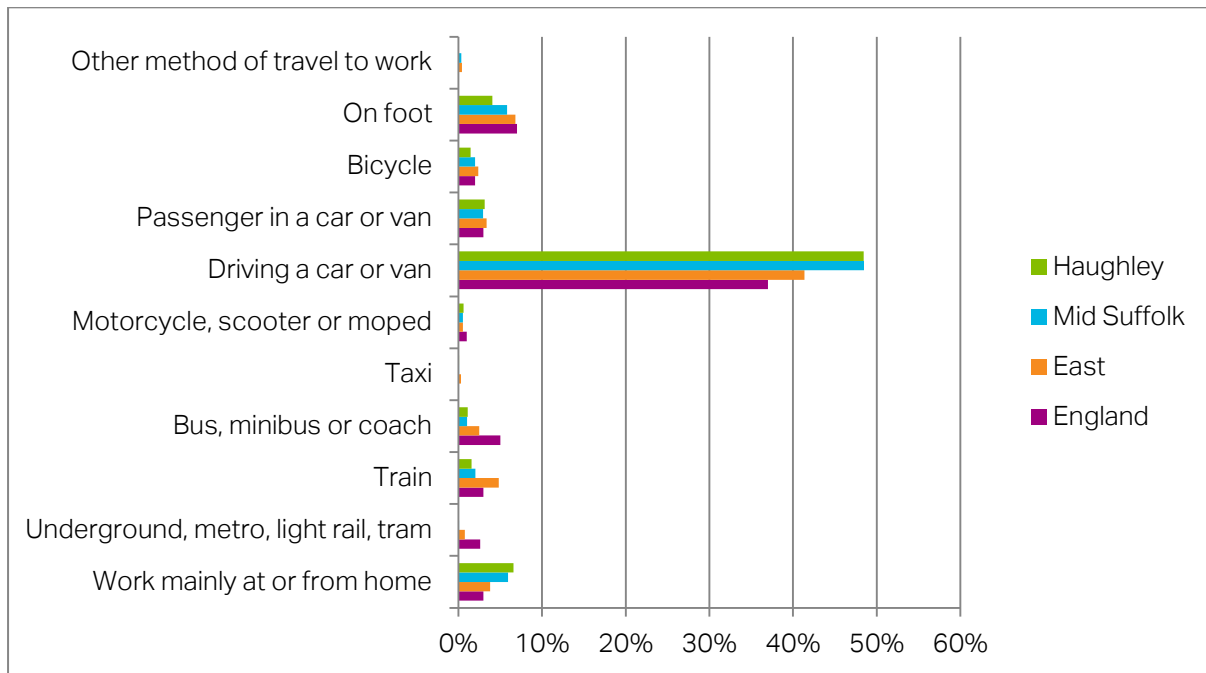


Figure 9.2: 'Method of Travel to Work'<sup>56</sup>

As shown in Figure 9.2, the most popular method of travelling to work in the Neighbourhood Plan area is via driving a car or van (48.4%), which is similar to the totals for Mid Suffolk (48.5%), but greater than the total for the East of England (41.4%) and England (37%). A lower percentage of residents in the Neighbourhood Plan catch a train, bus, minibus or coach to work in comparison to the regional and national trends. In contrast, a higher proportion of residents work mainly at or from home.

9.3.2 Summary of Future Baseline

New development has the potential to increase traffic and lead to additional congestion issues within the Neighbourhood Plan area, particularly at existing congestion hotspots. Whilst negative effects of new development on the transport network may be mitigated in part by the latest LTP, there will be a continuing need for development to be situated in accessible locations.

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.

<sup>56</sup> ONS (no date): Census 2011: 'Method of Travel to Work 2011' (Table QS701EW)

## 9.4 What are the SEA objectives and appraisal questions for the Transportation SEA theme?

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<b>SEA objective</b>	<b>Assessment Questions</b>
Promote sustainable transport use and reduce the need to travel.	Will the option/proposal help to: <ul style="list-style-type: none"><li>• Encourage modal shift to more sustainable forms of travel?</li><li>• Enable sustainable transport infrastructure enhancements?</li><li>• Facilitate working from home and remote working?</li><li>• Improve road safety?</li><li>• Reduce the impact on residents from the road network?</li></ul>

---

## 10. Next Steps

### 10.1 Subsequent stages for the SEA process

Scoping (the current stage) is the second stage of the SEA process<sup>57</sup>

1. Screening;
2. Scoping;
3. Assess reasonable alternatives, with a view to informing preparation of the draft plan;
4. Assess the draft plan and prepare the Environmental Report with a view to informing consultation and plan finalisation;
5. Publish a 'statement' at the time of plan adoption in order to 'tell the story' of plan-making / SEA (and present 'measures decided concerning monitoring')

The next stage will involve appraising reasonable alternatives for the Haughley Parish Neighbourhood Plan. This will consider alternative policy approaches for the Neighbourhood Plan, including alternative spatial strategies for the Neighbourhood Plan. The findings of the appraisal of these alternatives will be fed back to Haughley Parish Council's Neighbourhood Plan Working Party (the Neighbourhood Plan group) so that they might be taken into account when preparing the draft plan.

Once the draft (submission version') plan has been prepared by the Neighbourhood Plan group, it will be subjected to SEA and the Environmental Report prepared for consultation alongside it.

Following submission to Mid Suffolk District Council, and consultation, the Neighbourhood Plan will be put forward for Independent Examination.

### 10.2 Consultation on the Scoping Report

Public involvement through consultation is a key element of the SEA process. At this scoping stage, the SEA Regulations require consultation with statutory consultation bodies but not full consultation with the public.

The statutory consultation bodies are the Environment Agency, Historic England and Natural England. The Scoping Report has been released to these three statutory consultees.

Consultees are invited to comment on the content of this Scoping Report, in particular the evidence base for the SEA, the identified key issues and the proposed SEA Framework.

### 10.3 Download and viewing details

This consultation period runs from 10<sup>th</sup> October 2018 to 14<sup>th</sup> November 2018. Comments on the Scoping Report should be sent to:

Tamsin Stevens, AECOM

Email address: [Tamsin.Stevens@aecom.com](mailto:Tamsin.Stevens@aecom.com)

All comments received on the Scoping Report will be reviewed and will influence the development of the SEA where appropriate.

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<sup>57</sup> In accordance with the stages set out in the National Planning Practice Guidance



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# Strategic Environmental Assessment for the Haughley Parish Neighbourhood Plan

Environmental Report to accompany the submission  
version of the Neighbourhood Plan

Haughley Parish Neighbourhood Plan Working Party,  
Haughley Parish Council

December 2018

## Quality information

### Prepared by

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Ryan Putt  
Environmental  
Consultant

### Checked by

---

Nick Chisholm-Batten  
Associate

### Approved by

---

Steve Smith  
Technical Director

## Revision History

Revision	Revision date	Details	Authorized	Name	Position
V2.0	19/12/18	Submission version	19/12/18	Nick Chisholm- Batten	Associate

## Prepared for:

Haughley Parish Neighbourhood Plan Working Party on behalf of Haughley Parish Council

Prepared by:

AECOM Limited  
Aldgate Tower  
2 Lemn Street  
London E1 8FA  
United Kingdom

aecom.com

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## Non-Technical Summary

### What is Strategic Environmental Assessment (SEA)?

A strategic environmental assessment has been undertaken to inform the Haughley Parish Neighbourhood Plan. 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 residents.

### What is the Haughley Parish Neighbourhood Plan?

The Haughley Parish Neighbourhood Plan (HPNP) presents a plan for the administrative area of Haughley Parish in Suffolk to 2036.<sup>1</sup> Prepared to be in conformity with the Mid Suffolk Core Strategy, with due regard to the emerging Babergh & 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, housing, community facilities and the protection and enhancement of the environment.

It is currently anticipated that the Neighbourhood Plan will undergo a referendum in 2019.

### Purpose of this Environmental Report

This Environmental Report, which accompanies the current consultation on the HPNP, is the second document to be produced as part of the SEA process. The first document was the SEA Scoping Report (October 2018), which includes information about the Neighbourhood Plan area's environment and community.

The purpose of this Environmental Report is to:

- Identify, describe and evaluate the likely significant effects of the HPNP 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 HPNP 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 HPNP has been assessed;
- The appraisal of alternative approaches for the HPNP;
- The likely significant environmental effects of the HPNP;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the HPNP; and
- The next steps for the HPNP and accompanying SEA process.

---

<sup>1</sup> The Neighbourhood Plan area covers the part of Haughley Parish which lies to the north of the A14 and includes part of the Parish of Harleston which is also to the north of the A14 (see Figure 1.1).

## Assessment of alternative approaches for the Haughley Parish Neighbourhood Plan

### *Housing numbers to deliver through the Neighbourhood Plan*

During early stages of the development of the HPNP, a decision was made to allocate housing in the Neighbourhood Plan area through the Neighbourhood Plan. This reflected initial consultation undertaken for the Neighbourhood Plan, which indicated a desire within the community to support the vitality of the Neighbourhood Plan area, deliver affordable housing, deliver community benefits and shape development in the parish.

In response to this, during subsequent stages of plan making for the HPNP, the Neighbourhood Plan Working Party sought to explore different housing numbers to potentially deliver through the Neighbourhood Plan. As part of this process, a Housing Needs Assessment was undertaken for the parish of Haughley.

Following consideration of the emerging Joint Local Plan, further liaison with Mid Suffolk District Council and consultation undertaken on this issue with the local community, it was considered that the HPNP should seek to deliver up to 150 homes in the Neighbourhood Plan area.

On 31st May 2018 planning permission was granted for 98 homes on the Land East of King George V Playing Field site. As such, there is a residual need to deliver in the region of 50-60 homes through the Neighbourhood Plan.

### *Assessment of reasonable alternatives for the broad location of development in the Neighbourhood Plan area*

Following the decision to deliver an additional 50-60 dwellings through the HPNP, the Neighbourhood Plan Working Party sought to explore different options for locating new housing in the Neighbourhood Plan area.

A first consideration was where, in broad terms, to facilitate new housing provision in the Neighbourhood Plan area. To support decision-making on this element, the SEA process undertook an appraisal of two different alternative approaches linked to where, in relation to the existing settlements in Neighbourhood Plan area, new housing should be delivered.

In this context there are currently three main 'built up' areas of the Neighbourhood Plan area. These areas comprise Haughley village, which is the primary settlement in the Neighbourhood Plan area, and the smaller settlements of Haughley New Street and Haughley Green.

The two options initially considered through the SEA process were as follows:

- **Option 1:** Focus new development in Haughley village.
- **Option 2:** Facilitate a more dispersed development strategy, which enables allocations to take place in Haughley, Haughley New Street and Haughley Green.

In terms of other potential options, it was viewed that delivering a significant number of homes in the open countryside would not be compatible with national planning policy and the provisions of the Core Strategy/ emerging Joint Local Plan, and as such would not comprise a 'reasonable alternative' appropriate for considering through the SEA process.

The appraisal findings relating the assessment of the above two options are presented in Table 4.1 in this Environmental Report.

The assessment has highlighted that Option 1, which seeks to focus new housing provision in Haughley village, has most potential to support accessibility to amenities, and limit greenhouse gas emissions from transport. This is given the village has the broadest range of services and facilities in

the Neighbourhood Plan area. The option also has increased potential to support the vitality and viability of the village.

Option 1 however has increased potential to lead to significant impacts on the historic environment. This is given the sensitivity of many parts of Haughley village, linked to the presence of the Haughley Conservation Area, over 30 listed buildings and a significant archaeological resource. The option also has increased potential to lead to the loss of land classified as the best and most versatile agricultural land (although it should be noted that recent detailed agricultural land classification has not been carried out in the Neighbourhood Plan area).

Option 2 would be more likely to support the vitality of Haughley New Street and Haughley Green. It is also likely to enable development to take place in less sensitive areas in terms of the historic environment, as well as avoid the loss of the best quality agricultural land in the Neighbourhood Plan area. However the option would direct development to the locations of the Neighbourhood Plan area which are less accessible to services, amenities and public transport networks, and would do less to support community cohesion.

### *Assessment of reasonable alternatives for development strategies*

Following a decision to deliver the majority of housing growth to the main settlement in the Neighbourhood Plan area, Haughley village, the Neighbourhood Plan Working Party has considered potential sites for allocation in the vicinity of the village.

The 2017 Babergh and Mid Suffolk Joint Local Plan Draft Strategic Housing & Economic Land Availability Assessment (SHELAA) considered sites in Haughley, assessed on the grounds of suitability, availability and achievability for housing.

The role of the SHELAA was to test whether (and where) there is sufficient land available to meet the full objectively assessed needs for housing and economic development in the district. The SHELAA undertook an initial assessment of sites and their development capacities and sites were identified through two rounds of 'call for sites' processes in 2014 and 2016 for the Joint Local Plan. Assessments of the sites identified their suitability, availability and achievability for development.

The Draft SHELAA considered a total of nine sites within the parish, of which three were accepted and six discounted. Sites identified as available and potentially suitable for residential development are presented in Table NTS1 below.

**Table NTS1: Sites Identified as suitable and available in the Babergh and Mid Suffolk Joint Local Plan Draft SHELAA**

<b>Site Ref.</b>	<b>Site Address</b>	<b>Gross Area (Ha)</b>	<b>Estimated Dwellings Yield:</b>
SS0047	Land to the west of Fishponds Way, Haughley	5.1	25 <sup>2</sup>
SS0149	Land east of Fishponds Way, Haughley	8	120
SS0270	Land to the north of Station Road	1.28	25

The location of these sites is presented below.

<sup>2</sup> The Draft SHELAA (2017) estimated that the yield for SS0047 is 25 dwellings, further to this assessment AECOM masterplanning work found that the site can accommodate up to 50 dwellings.

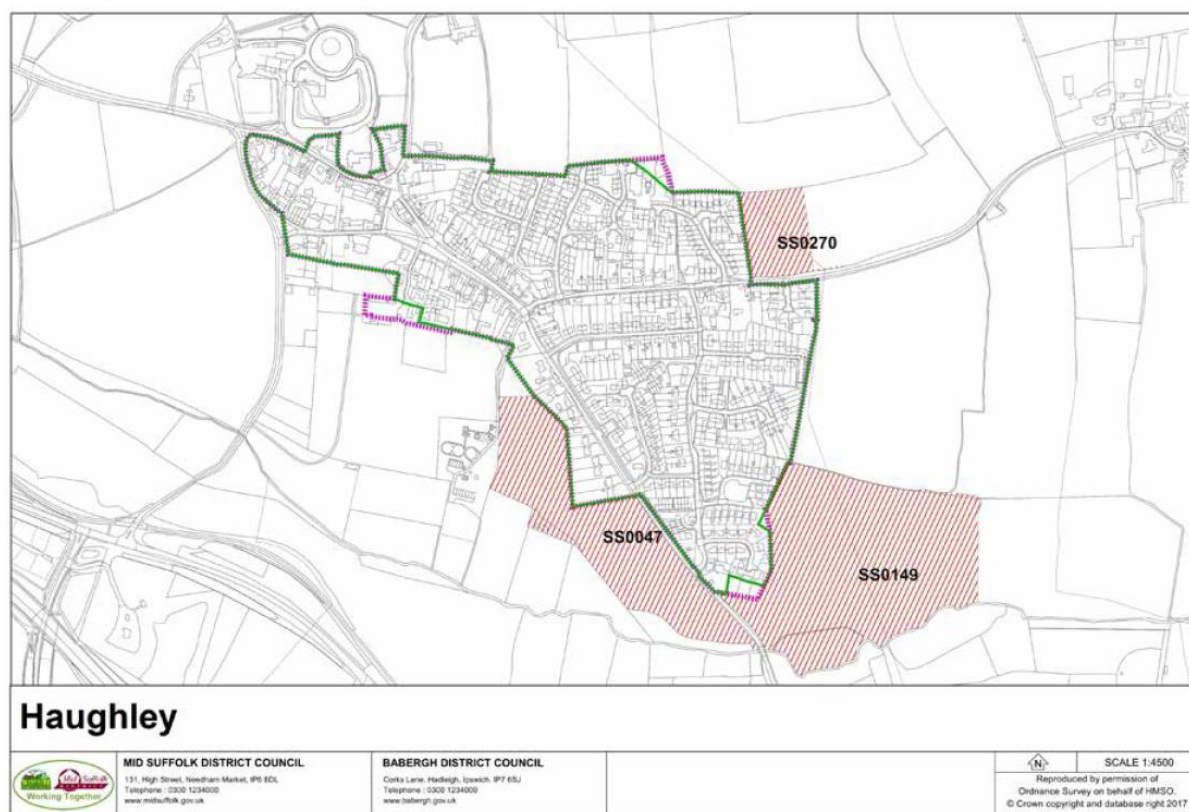


Figure NTS1: Sites identified as suitable and available in the Babergh and Mid Suffolk JLP SHELAA<sup>3</sup>

To support the development of a spatial strategy to deliver the proposed 50-60 homes through the Neighbourhood Plan, the SEA process has considered two options for delivering this indicative requirement. The options, which comprise different combinations of the three sites identified as suitable and available through the SHELAA process, are as follows:

- **Option A:** Delivery of the residual housing number through a single allocation on the Land east of Fishponds Way site
- **Option B:** Delivery of the residual housing number through a combination of allocations at 1) the Land west of Fishponds Way site and 2) the Land to the north of Station Road site

The appraisal findings relating the assessment of the above two options are presented in Table 4.3 in this Environmental Report.

The assessment has highlighted that Option A, which seeks to deliver the Neighbourhood Plan area's residual housing requirement through a single allocation on the Land east of Fishponds Way site, has increased potential to have significant impacts on landscape character in the vicinity of Haughley village. The option however, through focusing development on one site, may do more to facilitate community benefits through the delivery of on and off-site community infrastructure to support new housing provision.

In relation to potential impacts on biodiversity and land, soil and water resources, it is not possible to differentiate between the options at this level of detail. Both options are also likely to support the vitality and viability of Haughley village, facilitate housing delivery, and promote development at accessible locations in good proximity to the services and facilities available in the village.

<sup>3</sup> From inset Map of Haughley, Appendix 4 settlement maps of Babergh & Mid Suffolk Joint Local Plan: Consultation Document August 2017

## Assessment of the submission version of the Haughley Parish Neighbourhood Plan

The current version of the HPNP presents 16 'policies and proposals' and seven 'community needs and desires' to guide new development within the 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 HPNP. The Environmental Report has presented the findings of the assessment under the following SEA themes:

- Biodiversity;
- Climate Change;
- Landscape and Historic Environment;
- Land, Soil and Water resources;
- Population and Community;
- Health and Wellbeing; and
- Transportation.

The assessment has concluded that the current version of the Neighbourhood Plan is likely to lead to significant positive effects in relation to the 'Population and Community' SEA theme. This relates to the focus of the Neighbourhood Plan on the delivery of housing to meet local needs, its impetus on enhancing community vitality and on supporting accessibility to services, facilities and public transport networks. The Neighbourhood Plan is also likely to lead to significant positive effects in relation to the 'Health and Wellbeing' SEA theme, linked to its promotion of improved walking and cycling networks, enhancements to green infrastructure and open space provision, and the facilitation of high quality and sustainable design.

The Neighbourhood Plan will also bring positive effects in relation to the 'Landscape and Historic Environment' SEA theme. These benefits largely relate to the Neighbourhood Plan's focus on protecting local character, conserving and enhancing historic environment assets and their settings, and supporting the quality of the public realm. In addition the HPNP will bring positive effects in relation to the 'Biodiversity' SEA theme. However, given the approaches taken forward through the Neighbourhood Plan will help limit potential effects from new development areas rather than secure significant enhancements, these impacts are unlikely to comprise significant positive effects overall.

With regard to the 'Land, Soil and Water Resources' SEA theme, the Neighbourhood Plan may have the potential to lead to significant negative effects relating to the potential loss of the best and most versatile agricultural land. However this is uncertain given recent agricultural land classification has not been undertaken at the locations which have been allocated for new development through the Neighbourhood Plan.

The Neighbourhood Plan will also initiate a number of beneficial approaches regarding the 'Climate Change' and 'Transportation' SEA themes. 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.

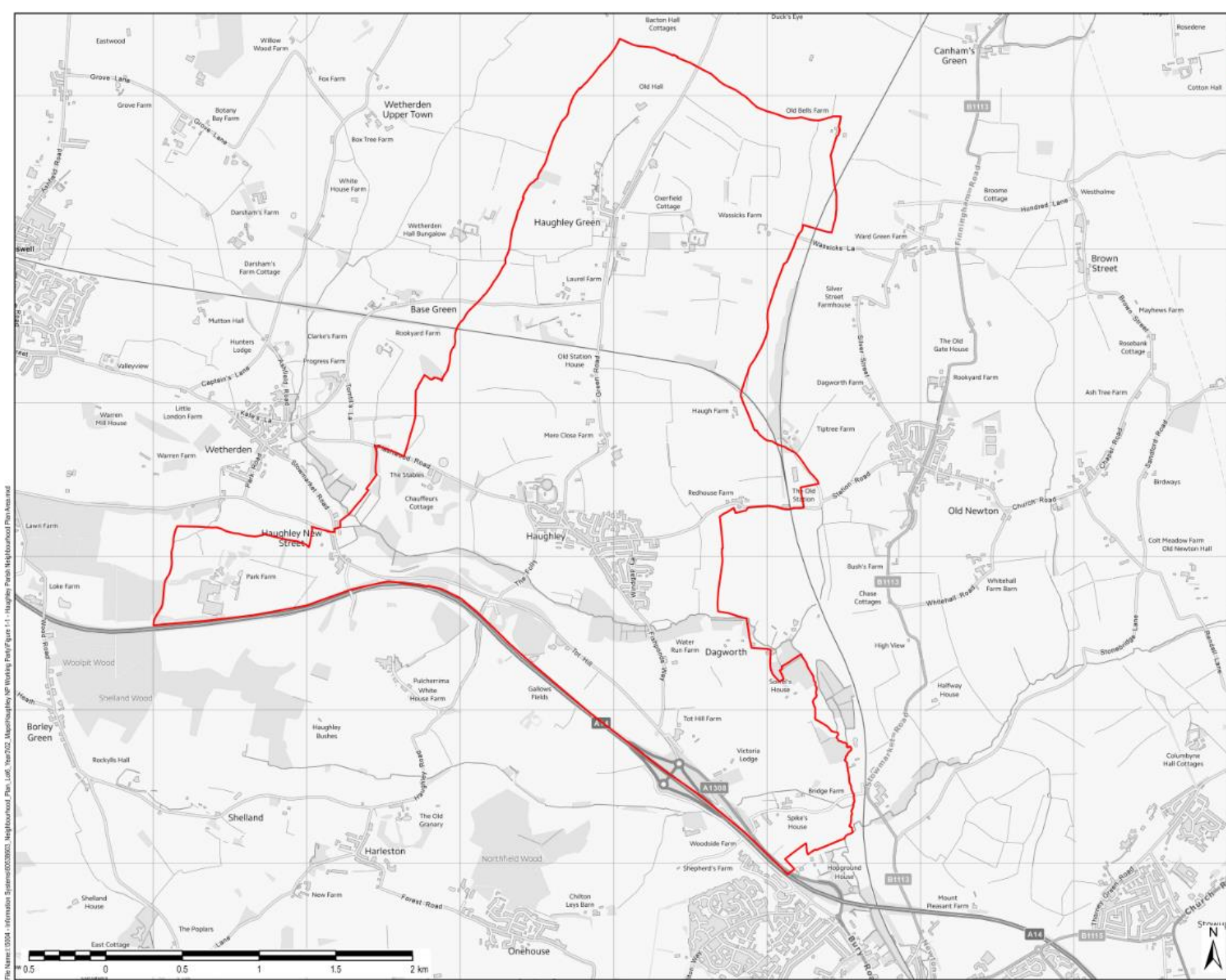
### Next steps

This Environmental Report accompanies the Neighbourhood Plan for submission to the Local Planning Authority, Mid Suffolk District Council, for Independent Examination.

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 currently adopted Local Plan for Mid Suffolk.

If the Independent Examination is favourable, the HPNP 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 HPNP will become part of the Development Plan for Haughley Parish.





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**LEGEND**

Haughley Parish Neighbourhood Plan Area

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Purpose of Issue **DRAFT**

Client **HAUGHLEY PARISH NEIGHBOURHOOD PLAN WORKING PARTY**

Project Title  
**SEA FOR THE HAUGHLEY PARISH NEIGHBOURHOOD PLAN**

Drawing Title  
**HAUGHLEY PARISH NEIGHBOURHOOD PLAN AREA**

Drawn CN	Checked JW	Approved TS	Date 20/12/2018
AECOM Internal Project No. 60538603		Scale @ A3 1:22,500	

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AECOM  
South House  
Agora UK, Sandgate  
Faversham, Kent, UK  
Telephone: 01524 342000  
Fax: 01524 342000  
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# 1. Introduction

## Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of Haughley Parish's emerging Neighbourhood Plan.
- 1.2 The Haughley Parish Neighbourhood Plan (HPNP) is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan is being prepared in the context of Mid Suffolk's Core Strategy with due regard to the emerging Babergh & Mid Suffolk Joint Local Plan.
- 1.3 It is currently anticipated that the Neighbourhood Plan will be submitted to Mid Suffolk District Council in late 2018, and undergo a referendum in 2019.
- 1.4 Key information relating to the HPNP is presented in Table 1.1.

**Table 1.1: Key facts relating to the Haughley Parish Neighbourhood Plan**

<b>Name of Qualifying Body</b>	Haughley Parish Council
<b>Title of Plan</b>	Haughley Parish Neighbourhood Plan (HPNP)
<b>Subject</b>	Neighbourhood planning
<b>Purpose</b>	<p>The HPNP 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 Mid Suffolk's Core Strategy with due regard to the emerging Babergh &amp; Mid Suffolk Joint Local Plan.</p> <p>The Neighbourhood Plan will be used to guide and shape development within the Haughley Parish Neighbourhood Plan area.</p>
<b>Timescale</b>	To 2036
<b>Area covered by the plan</b>	The Haughley Parish Neighbourhood Plan area covers the part of Haughley Parish which lies to the north of the A14 and includes part of the Parish of Harleston which is also to the north of the A14 (Figure 1.1).
<b>Summary of content</b>	The HPNP will set out a vision, strategy and range of policies for the Neighbourhood Plan area.
<b>Plan contact point</b>	Chris Adams, Haughley Parish Neighbourhood Plan Working Party Email address: <a href="mailto:chrisadams638@btinternet.com">chrisadams638@btinternet.com</a>



## SEA explained

- 1.5 Strategic Environmental Assessment (SEA) is a mechanism for considering and communicating the impacts of an emerging plan, and potential alternatives in terms of key sustainability issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts. Through this approach, the SEA for the Haughley Parish Neighbourhood Plan seeks to maximise the developing plan's contribution to sustainable development.
- 1.6 SEA is undertaken to address 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<sup>4</sup>. It also widens the scope of the assessment from focussing on environmental issues to further consider social and economic issues.
- 1.7 The HPNP has been screened in by Mid Suffolk District Council as requiring an SEA. To meet this requirement, the Neighbourhood Plan is undergoing an SEA process which incorporates the requirements of the SEA Directive.
- 1.8 The SEA will be undertaken to meet specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).
- 1.9 Two key procedural requirements of the SEA Regulations are that:
  1. When deciding on 'the scope and level of detail of the information' which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues; and
  2. A report (the 'Environmental Report') is published for alongside the Draft Plan (i.e. the draft Haughley Parish Neighbourhood Plan) that presents outcomes from the environmental assessment (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.

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<sup>4</sup> Directive 2001/42/EC

## Structure of this SEA Environmental Report

1.10 This document is the SEA Environmental Report for the HPNP and hence needs to answer all four of the questions listed below 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:

**Table 1.2: Questions that must be answered by the SEA Environmental Report in order to meet the regulatory<sup>5</sup> requirements**

Environmental Report question	In line with the SEA Regulations, the report must include... <sup>6</sup>
What is the plan seeking to achieve?	<ul style="list-style-type: none"> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
What is the sustainability 'context'?	<ul style="list-style-type: none"> <li>The relevant environmental protection <b>objectives</b>, established at international or national level</li> <li>Any existing environmental <b>problems</b> which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
<b>What's the scope of the SEA?</b> What is the sustainability 'baseline'?	<ul style="list-style-type: none"> <li>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> <li>The environmental characteristics of areas likely to be significantly affected</li> <li>Any existing environmental <b>problems</b> which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
What are the key issues & objectives?	<ul style="list-style-type: none"> <li>Key <b>problems/issues</b> and <b>objectives</b> that should be a focus of (i.e. provide a 'framework' for) assessment</li> </ul>
<b>What has plan-making/SEA involved up to this point?</b>	<ul style="list-style-type: none"> <li>Outline reasons for selecting the <b>alternatives</b> dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>The likely significant effects associated with <b>alternatives</b></li> <li>Outline reasons for selecting the preferred approach in-light of <b>alternatives</b> appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.</li> </ul>
<b>What are the assessment findings at this stage?</b>	<ul style="list-style-type: none"> <li>The likely significant effects associated with <b>the submission version of the plan</b></li> <li>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing <b>the submission version of the plan</b></li> </ul>
<b>What happens next?</b>	<ul style="list-style-type: none"> <li>The next steps for plan making/SEA process.</li> </ul>

<sup>5</sup> Environmental Assessment of Plans and Programmes Regulations 2004

<sup>6</sup> 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 for the Haughley Parish Neighbourhood Plan

### Local Plan context for the Neighbourhood Plan

- 2.1 The current local planning policy for Haughley is contained in:
- Mid Suffolk Core Strategy (adopted in 2008);
  - Mid Suffolk Core Strategy Focused Review (adopted in 2012);
  - Stowmarket Area Action Plan (adopted 2013); and
  - The “saved” policies of the Mid Suffolk Local Plan (adopted 1998).
- 2.2 Haughley is designated as a Key Service Centre in the Core Strategy settlement hierarchy. Key Service Centres are large villages with a good level of services, which might include:
- A primary and a secondary school within the settlement or easily accessible by public transport;
  - Primary health care facilities;
  - A range of retail and service provision capable of meeting day-to-day needs, in particular for convenience shopping;
  - Local employment opportunities; and
  - Frequent public transport to higher order settlements.
- 2.3 Neighbourhood plans are required to be in general conformity with the strategic policies of the Local Plan and can develop policies and proposals to address local place-based issues. An emerging Joint Local Plan is currently being undertaken between Mid Suffolk District Council and Babergh District Council. In this plan, Haughley is considered a ‘Core Village’ due it having a high level of services and facilities that are judged to be of importance in relation to sustainability and vitality of the local community. The emerging Joint Local Plan is at a relatively early stage and therefore the Core Strategy remains the key policy document for the district. The latest public document of the emerging Joint Local Plan is the Consultation Document which was published in August 2017.<sup>7</sup>
- 2.4 Under the emerging Joint Local Plan, Mid Suffolk has a residual need for new housing between 2017 and 2036 of 5,820 new dwellings. In the absence of a specific housing target for Haughley, the Neighbourhood Plan Working Party propose a target of 150 dwellings over the plan period, following consideration of the environmental and visual constraints and the views of local residents in the Housing Needs Survey which was completed in May 2016.

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<sup>7</sup> Babergh & Mid Suffolk District Council (2017) Joint Local Plan: Consultation Document [online] available at: <  
<https://www.midsuffolk.gov.uk/assets/Strategic-Planning/JLP-Reg-18-Docs/BMSDC-Joint-Local-Plan-Consultation-Document-August-2017.pdf>> [last accessed 19/09/18]

## Vision, aims and objectives for the Neighbourhood Plan

- 2.5 The vision for the Haughley Parish Neighbourhood Plan, which was developed during earlier stages of plan development, is as follows:
- 



*By 2036 Haughley Parish will be a connected, viable and attractive rural area with a strong heritage and community spirit. It will have a range of homes and essential public services (including high speed broadband connection) that meet the growing needs of the community and are in keeping with the area. The natural and historic environment will be protected and enhanced. Haughley Parish will be a safe and sustainable rural community where people want to live and which they want to use into the future.*

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### Vision Statement for the Haughley Parish Neighbourhood Plan



- 2.6 The objectives of the Haughley Parish Neighbourhood Plan, which were developed during earlier stages of plan development, are as follows:
- Objective 1: To ensure that new housing and all new development in Hayley village and Parish is provided in a suitable range of tenures, types and sizes so that local people of all ages can continue to live in a suitable home and where local housing needs are met, while retaining the rural character of the village and Parish;
  - Objective 2: To preserve and enhance the historic built environment of Haughley;
  - Objective 3: To enhance Haughley's role as a Core Village by protecting and improving existing facilities and services;
  - Objective 4: To ensure that sustainable development is secured for this and future generations by protecting key environmental assets (e.g. green spaces and landscapes) and taking account of constraints (e.g. flooding); and
  - Objective 5: To ensure that traffic and transport issues in Haughley Parish are tackled, including enhanced provision for walking and cycling.

## 3. What is 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.<sup>8</sup> These authorities were consulted on the scope of the Haughley Parish Neighbourhood Plan SEA in October 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 Responses received on the Scoping Report, and how they were addressed, have been summarised below.

**Table 3.1: Consultation responses received on the SEA Scoping Report**

Consultation response	How the response was considered and addressed
<b>Historic England</b>	
Edward James, Historic Places Adviser, East of England (Email response received on 14 <sup>th</sup> November 2018)	
We would refer you to the guidance in Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment, which can be found here: < <a href="https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/">https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/</a> >. This advice sets out the historic environment factors which need to be considered during the Strategic Environmental Assessment process and our recommendations for information you may need to include.	Comment noted. The advice note has been referenced within the 'context review' of the landscape and historic environment section in Appendix A of this environmental report.

<sup>8</sup> In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because *'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.'*

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## Consultation response

## How the response was considered and addressed

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Although we are pleased to see reference to, amongst other guidance documents, Historic England's Advice Note 1 on the Designation, Appraisal and Management of Conservation Areas, we would welcome a reference to this specific guidance on undertaking SEA and Sustainability Appraisal, as well as obvious consideration of its advice, in the Scoping Report. We would suggest that where the Framework is referenced in the Policy Context section, the relevant paragraph numbers should be included for clarity. We note also that there is no reference to the potential threat to below ground archaeology, not protected by an existing designation, in paragraph 5.3.2.

The 'context review' within the landscape and historic environment section of Appendix A has been updated accordingly to provide further information on relevant guidance documents from Historic England.

In regards to below-ground archaeology, the SEA Framework assessment questions for the landscape and historic environment theme has been updated to include:

- Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, above and below-ground, and their setting.
- Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies.

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We welcome the reference to Historic England's Heritage at Risk Register on page 23, but would highlight that the most recent register was published on 8th November 2018, and the reference may therefore need updating.

The 'summary of current baseline' within the 'landscape and historic environment' section of the Appendix A has been updated to include information from the 2018 Heritage at Risk Register.

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We are pleased to note the inclusion of the Haughley Conservation Area Appraisal in the supporting text, as well as the discussion of the local historic environment and landscape. We suggest that, given the pressure for development in and around Haughley identified by the Scoping Report in Section 1.2, more information on the potential for non-designated below ground archaeology in the parish could be included. This can either be obtained from the Suffolk County Historic Environment Record, or via the Heritage Gateway <<http://www.heritagegateway.org.uk/gateway/>>.

The 'summary of current baseline' within the 'landscape and historic environment' section of the Appendix A has been updated to include more information on the potential for non-designated below ground archaeology – with reference to the Suffolk Historic Environment Record.

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## Consultation response

## How the response was considered and addressed

Considerations of the below ground 'cultural heritage resource' should also be included in the 'Assessment Questions' on page 23, with reference to paragraphs 185, 189, 192 and footnote 63 on page 56 of the Framework, all of which deal with the desirability of sustaining and enhancing all types of heritage asset. At present the questions only appear to deal with above ground and built elements of the historic environment.

Comment noted. The assessment questions within the SEA Framework have been updated, to include the following:

- Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, above and below-ground, and their setting.
- Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies.

## Environment Agency

Natalie Kermath, Planning Adviser (Email response received on 14<sup>th</sup> November 2018)

### Flood Risk

The River Rat runs through the Haughley Neighbourhood Area. As identified in the Scoping Report, a small part of Neighbourhood Area is located in flood zones 2 and 3, the medium and high zones respectively. Flood risk should therefore be scoped in and considered in the SEA.

We are pleased to see in the Scoping Report that flood risk will be assessed with a consideration of climate change. Further information on the consideration of climate change is included in Technical Appendix 1.

Comment noted. Flood risk has been considered in the SEA, within the 'climate change' appraisal in chapter 5 of this environmental report.

### Water Quality

We agree with the content of paragraph 6.3.2, which highlights the importance of Water quality. We advise that when assessing the impacts of development on water courses and groundwater, reference should be given to environmental legislation such as Water Framework Directive, in particular the two key objectives of no deterioration in waterbody status and improve to good status.

The 'context review' in the land, soil and water resources section of Appendix A has been updated to include reference to the Water Framework Directive.

Water quality has been considered in the SEA, within the 'land, soil and water resources' appraisal in chapter 5 of this environmental report.

### Contaminated Land

It is essential contaminated land, and the impact of contaminating land is recognised as a significant environmental issue and is properly addressed in the SEA.

Contaminating land has been considered in the SEA, within the 'land, soil and water resources' appraisal in chapter 5 of this environmental report.

Consultation response	How the response was considered and addressed
<p><u>Surface Water Management</u></p> <p>We refer you to our requirements for Sustainable Drainage Systems, which can be found in Technical Appendix 2 at the end of this letter. Chapter 6.3.1 titled Watercourses recognises SPZ's and the risk of contamination that these pose. It is also important to recognise that the Neighbourhood area lies over a principal and secondary Aquifer, which also creates vulnerability between ground water and development. Any potential impacts should be assessed within the SEA.</p>	<p>Comment noted. The potential impacts to groundwater quality have been considered in the SEA, presented in the 'land, soil and water resources' appraisal in chapter 5 of this environmental report.</p>
<b>Natural England</b>	
No comments received.	N/A

3.4 Baseline information (including the context review and baseline data) is presented in **Appendix A**. The key sustainability issues and SEA Framework are presented below.

## Key Sustainability Issues

### Air Quality

- Air quality in the Neighbourhood Plan area is good, with no significant issues identified.
- There are no Air Quality Management Areas (AQMAS) within the Neighbourhood Plan area or within Mid Suffolk District, as highlighted in the 2016 Local Air Quality Management (LAQM) Annual Status Report.
- Housing and employment growth have the potential to increase emissions and reduce air quality in the area.
- **Due to the absence of any significant air quality issues within the Neighbourhood Plan area, air quality has been scoped out for the purposes of the SEA process.**

### Biodiversity and Geodiversity

- There are no European or nationally designated sites for biodiversity and/or geodiversity located within or adjacent to the Neighbourhood Plan area.
- Gallowsfield Wood is a County Wildlife Site located in the Neighbourhood Plan area.
- There are Biodiversity Action Plan (BAP) priority habitats present in the Neighbourhood Plan area including patches of coastal and floodplain grazing marsh, and deciduous woodland.

### Climate Change

- Any increases in the built footprint of the Neighbourhood Plan area (associated with the delivery of new housing and employment land) has the potential to increase overall greenhouse gas emissions in the Parish.
- The total CO<sub>2</sub> emissions per capita within Mid Suffolk District are broadly higher than the regional and national totals.
- There are areas of land adjacent to the River Rat and its tributaries which are located within Flood Risk Zone 3, and as such, have a >1% chance of being flooded each year.
- Within the Neighbourhood Plan area, there are corridors of land at medium-high risk of surface water and sewer flooding.



- The HPNP should seek to increase the resilience of the Neighbourhood Plan area to the effects of climate change by supporting and encouraging adaptation strategies.

### Landscape and Historic Environment

- Haughley is comprised of four landscape types: ancient plateau claylands, plateau claylands, rolling valley farmlands & furze and wooded valley meadows.
- There are a variety of heritage assets within the Neighbourhood Plan area, including a scheduled monument, one Grade I, 65 Grade II and two Grade II\* listed buildings.
- The Haughley Conservation Area covers a significant part of the village.

### Land, Soil and Water Resources

- Land in the Neighbourhood Plan area has been classified as Grade 2 and Grade 3 agricultural land based on Pre-1988 Agricultural Land Classification. In this context Grade 2 can be considered as land classified as the best and most versatile.
- The River Rat flows through the southern section of the Neighbourhood Plan area and eventually joins the River Gipping.

### Population and Community

- The population of Haughley has declined between 2001 and 2011.
- There are a greater proportion of residents within the 60+ age category within the Neighbourhood Plan area in comparison to the regional and national averages.
- In regards to the Index of Multiple Deprivation (IMD) categories, the LSOA that the Neighbourhood Plan area lies in is within the 50% least deprived areas in England.

### Health and Wellbeing

- 78.3% of residents the Neighbourhood Plan area consider themselves as having 'very good health' or 'good health', lower than the totals for Mid Suffolk (88.1%), the East of England (82.5%) and England (81.4%).
- A higher proportion of residents within the Neighbourhood Plan area report that their activities are limited in some way compared to regional and national averages.

### Transportation

- There is no railway station located within the Neighbourhood Plan area but Stowmarket and Elmswell railway stations are in relatively close proximity to the area.
- There are four principal bus routes which pass through the Neighbourhood Plan area, however they are fairly infrequent and two of them are for school pupils only.
- The Neighbourhood Plan area is well linked to the national road network, with access to the A14, A131 and M11 a network of country roads.
- Residents have access to a network of footpaths within the Neighbourhood Plan area.
- There are no national cycle routes located within the Neighbourhood Plan area.
- 81.5% of residents within the Neighbourhood Plan area have access to a car or van.

## SEA Framework

3.5 The SEA Framework provides a way in which environmental effects can be defined and subsequently analysed based on standard 'tests'. Each proposal within the submission version of the HPNP will be assessed consistently using the framework.

SEA Objective	Assessment questions
<b>Biodiversity and Geodiversity</b>	
Protect and enhance all biodiversity and geological features.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Support the status of the locally designated sites of significance within and/or adjacent to the Neighbourhood Plan area boundary, including Gallowsfield Wood?</li> <li>• Protect and enhance semi-natural habitats?</li> <li>• Protect and enhance priority habitats, and the habitat of priority species?</li> <li>• Achieve a net gain in biodiversity?</li> <li>• Support enhancements to multifunctional green infrastructure networks?</li> <li>• Support access to, interpretation and understanding of biodiversity and geodiversity?</li> </ul>
<b>Climate change</b>	
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"> <li>• Reduce the number of journeys made?</li> <li>• Reduce the need to travel?</li> <li>• Promote the use of sustainable modes of transport, including walking, cycling and public transport?</li> <li>• Increase the number of new developments meeting or exceeding sustainable design criteria?</li> <li>• Generate energy from low or zero carbon sources?</li> <li>• Reduce energy consumption from non-renewable resources?</li> </ul>
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"> <li>• Ensure that inappropriate development does not takes place in areas at higher risk of flooding, taking into account the likely future effects of climate change?</li> <li>• Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change?</li> <li>• Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)?</li> <li>• Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan area?</li> <li>• Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?</li> </ul>

SEA Objective	Assessment questions
<b>Landscape and Historic Environment</b>	
Protect, maintain and enhance the cultural heritage resource within the Neighbourhood Plan area, including the historic environment and archaeological assets.	<ul style="list-style-type: none"> <li>• Will the option/proposal help to:</li> <li>• Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, above and below-ground, and their setting?</li> <li>• Conserve and enhance the special interest, character and appearance of the Haughley Conservation Area and its setting?</li> <li>• Support the integrity of the historic setting of key buildings and features of cultural heritage interest?</li> <li>• Conserve and enhance local diversity and character?</li> <li>• Support access to, interpretation and understanding of the historic environment?</li> <li>• Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies.</li> </ul>
Protect and enhance the character and quality of landscapes and townscape.	<ul style="list-style-type: none"> <li>• Will the option/proposal help to:</li> <li>• Support landscape character reflecting the sensitivities of the four landscape types covering the Neighbourhood Plan area?</li> <li>• Conserve and enhance landscape and townscape features?</li> </ul>
<b>Land, Soil and Water Resources</b>	
Ensure the efficient and effective use of land.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Promote the use of previously developed land?</li> <li>• Avoid the development of the best and most versatile agricultural land, which in the Parish may comprise Grade 2 and 3a agricultural land?</li> </ul>
Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Reduce the amount of waste produced?</li> <li>• Support the minimisation, reuse and recycling of waste?</li> <li>• Maximise opportunities for local management of waste in order to minimise export of waste to areas outside?</li> <li>• Encourage recycling of materials and minimise consumption of resources during construction?</li> </ul>
Use and manage water resources in a sustainable manner.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Support improvements to water quality?</li> <li>• Minimise water consumption?</li> <li>• Protect sensitive groundwater resources in the Neighbourhood Plan area?</li> </ul>

## Population and Community

<p>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>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Promote the development of a range of high quality, accessible community facilities?</li> <li>• Encourage and promote social cohesion and encourage active involvement of local people in community activities?</li> <li>• Minimise fuel poverty?</li> <li>• Maintain or enhance the quality of life of existing local residents?</li> </ul>
<p>Reduce deprivation and promote a more inclusive and self-contained community.</p>	<ul style="list-style-type: none"> <li>• Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people?</li> <li>• Support the provision of land for allotments and cemeteries?</li> </ul>
<p>Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Support the provision of a range of house types and sizes?</li> <li>• Support enhancements to the current housing stock?</li> <li>• Meet the needs of all sectors of the community?</li> <li>• Provide quality and flexible homes that meet people's needs?</li> <li>• Promote the use of sustainable building techniques, including use of sustainable building materials in construction?</li> <li>• Provide housing in sustainable locations that allow easy access to a range of local services and facilities?</li> </ul>

## Health and Wellbeing

<p>Improve the health and wellbeing residents within the Neighbourhood Plan area.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Promote accessibility to a range of leisure, health and community facilities, for all age groups?</li> <li>• Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards?</li> <li>• Reduce noise pollution?</li> <li>• Promote the use of healthier modes of travel?</li> <li>• Improve access to the countryside for recreational use?</li> </ul>
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## Transportation

<p>Promote sustainable transport use and reduce the need to travel.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Encourage modal shift to more sustainable forms of travel?</li> <li>• Enable sustainable transport infrastructure enhancements?</li> <li>• Facilitate working from home and remote working?</li> <li>• Improve road safety?</li> <li>• Reduce the impact on residents from the road network?</li> </ul>
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## 4. What has plan making / SEA involved up to this point?

### Introduction

- 4.1 The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report.
- 4.2 A key element of the SEA process is the appraisal of 'reasonable alternatives' for the HPNP. The SEA Regulations<sup>9</sup> 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*'.
- 4.3 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.
- 4.4 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 development. Specifically, this chapter explains how the HPNP's development strategy has been shaped through considering alternative approaches for the location of housing in the Neighbourhood Plan area.

### Overview of plan making / SEA work undertaken since 2015

- 4.5 Plan-making for the HPNP has been underway since November 2015. Initial work incorporated a number of informal and formal consultation exercises carried out by the Neighbourhood Plan Steering Group, including on the scope of the Neighbourhood Plan.
- 4.6 A significant number of consultation events have since been carried out for the Neighbourhood Plan. This has included a range of exhibitions, questionnaires, public meetings and questions and answer sessions. Regulation 14 consultation was also undertaken in May 2018.
- 4.7 The following sections discuss the evolution of the HPNP in association with the SEA process.

### Housing numbers to deliver through the Neighbourhood Plan

- 4.8 As discussed in section 2.1, the HPNP has been prepared in conjunction with the provisions of the Mid Suffolk Core Strategy, the Core Strategy Focused Review, the Stowmarket Area Action Plan and the 1998 Local Plan, with due regard to the provisions of the emerging Joint Local Plan (JLP).

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<sup>9</sup> Environmental Assessment of Plans and Programmes Regulations 2004

- 4.9 Within the Mid Suffolk Core Strategy, Haughley is designated as one of ten key Service Centres. Under the emerging JLP Haughley is categorised as a “Core Village”.
- 4.10 The latest version of the JLP does not identify sites for development within the Neighbourhood Plan area, or identify housing numbers to deliver, but takes an approach which aims to enable development to come forward in the village.
- 4.11 Under the “Housing Development Settlement Hierarchy” and “Spatial Distribution” sections of the emerging JLP, Mid Suffolk identifies a residual need for new housing between 2017 and 2036 of 5,820 new dwellings in the district. Haughley is categorised as a “Core Village”, meaning that it has a high level of services and facilities that are judged to be of importance in relation to sustainability and vitality of the local community.
- 4.12 During early stages of the development of the HPNP, a decision was made to allocate housing in the Neighbourhood Plan area through the Neighbourhood Plan. This reflected initial consultation undertaken for the Neighbourhood Plan, which indicated a desire within the community to support the vitality of the Neighbourhood Plan area, deliver affordable housing, deliver community benefits and shape development in the parish.
- 4.13 In response to this, during subsequent stages of plan making for the HPNP, the Neighbourhood Plan Working Party sought to explore different housing numbers to potentially deliver through the Neighbourhood Plan. As part of this process, a Housing Needs Survey was undertaken for the parish of Haughley.
- 4.14 Following consideration of the emerging JLP, further liaison with Mid Suffolk District Council and consultation undertaken on this issue with the local community, it was considered that the HPNP should seek to deliver up to 150 homes in the Neighbourhood Plan area.
- 4.15 On 31<sup>st</sup> May 2018 planning permission was granted for 98 homes on the Land East of King George V Playing Field site. As such, there is a residual need to deliver in the region of 50-60 homes through the Neighbourhood Plan.

## Assessment of reasonable alternatives for the broad location of development in the Neighbourhood Plan area

- 4.16 Following the decision to deliver an additional 50-60 dwellings through the HPNP, the Neighbourhood Plan Working Party sought to explore different options for locating new housing in the Neighbourhood Plan area.
- 4.17 A first consideration was where, in broad terms, to facilitate new housing provision in the Neighbourhood Plan area. To support decision-making on this element, the SEA process undertook an appraisal of two different alternative approaches linked to where, in relation to the existing settlements in Neighbourhood Plan area, new housing should be delivered.
- 4.18 In this context there are currently three main 'built up' areas of the Neighbourhood Plan area. These are Haughley village, which comprises the primary settlement in the Neighbourhood Plan area, and the smaller settlements of Haughley New Street and Haughley Green.
- 4.19 The two options therefore considered through the SEA process were as follows:
- **Option 1:** Focus new development in Haughley village.
  - **Option 2:** Facilitate a more dispersed development strategy, which enables allocations to take place in Haughley, Haughley New Street and Haughley Green.
- 4.20 In terms of other potential options, it was viewed that delivering 50-60 homes in the open countryside would not be compatible with national planning policy and the provisions of the Core Strategy/ emerging JLP, and as such would not comprise a 'reasonable alternative' appropriate for considering through the SEA process.
- 4.21 **Table 4.1** presents the findings of the appraisal of Option 1 and Option 2 outlined above. To support the assessment findings, the options have been ranked in terms of their sustainability performance against the relevant SEA theme. It is anticipated that this will provide the reader with a likely indication of the comparative sustainability performance of the two options in relation to each theme considered.

**Table 4.1: Appraisal findings: reasonable alternatives for broad locations of development**

**Option 1:** Focus new development in Haughley village.

**Option 2:** Facilitate a more dispersed development strategy, which enables allocations to take place in Haughley village, Haughley New Street and Haughley Green.

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Biodiversity	<p>No internationally or nationally designated sites are present in the Neighbourhood Plan area, and there are also no SSSI Impact Risk Zones covering the Neighbourhood Plan area. Therefore the two options are unlikely to lead to significant effects on internationally or nationally designated sites. The County Wildlife Site present in the Neighbourhood Plan area is located at Gallowsfield Wood, which is not in close proximity to the three potential areas of housing allocations at Haughley village, Haughley New Street and Haughley Green.</p> <p>In terms of other key biodiversity habitats, and ecological networks, the relative merits of the options largely depend on the detailed location of development, the provision of new and enhanced green infrastructure alongside new development, the retention and incorporation of biodiversity features within new housing provision and detailed design and layout. In this context Biodiversity Action Plan Priority Habitats are present in all three locations.</p>	=	=
Climate change	<p>In terms of greenhouse gas emissions, road transport is the significant contributor to emissions in the area. The extent to which the two options have the potential to support climate change mitigation through facilitating a reduced level of car dependency is therefore a key element.</p> <p>In this context, Option 1 is likely to encourage a distribution strategy which promotes development at locations in closer proximity to the existing services and facilities of the main settlement in the Neighbourhood Plan area, Haughley village. In this respect Haughley village has a range of services and facilities, including the primary school and pre-school, St Mary's Church, the Maxwell Charnley Community Room, a post office, a Co-op store, the Village Hall and King George V Playing Field. This will help limit greenhouse gas emissions from transport through encouraging new development in locations with closer proximity to the services, facilities and amenities present in Haughley village.</p> <p>In terms of climate change adaptation, the extent to which the options promote climate change adaptation depends on the specific location, design, layout and scale of development, and the incorporation of features which support climate resilience.</p>	1	2



**Option 1:** Focus new development in Haughley village.

**Option 2:** Facilitate a more dispersed development strategy, which enables allocations to take place in Haughley village, Haughley New Street and Haughley Green.

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Landscape and historic environment	<p>In relation to historic environment constraints, the western part of Haughley village has the largest concentration of features and areas of historic interest in the Neighbourhood Plan area. This includes the Haughley Conservation Area, over 30 listed buildings and the scheduled monument of Haughley Castle. Haughley Green and Haughley New Street also both have a number of listed buildings. Given the option potentially will do more to deliver housing provision away from the most sensitive locations in the parish, Option 2 has more limited potential to lead to significant impacts on the fabric and setting of the historic environment. However, this depends on the detailed location, design and layout of development.</p> <p>In terms of landscape character it is difficult to differentiate between the two options without an understanding of the detailed location of development, and its design and layout. However Option 1 has increased potential to lead to impacts on landscape character in the vicinity of Haughley, whilst Option 2 has increased potential to lead to impacts on landscape character in the vicinity of Haughley New Street and Haughley Green.</p>	2	1
Land, soil and water resources	<p>No recent detailed agricultural land classification has been undertaken in the Neighbourhood Plan area. However the pre-1988 classification suggests that the Grade 2 land (which is land classified as the best and most versatile) present in the Neighbourhood Plan area is primarily located in the vicinity of Haughley village. Option 2 therefore has the potential to lead to a development strategy which will do more to avoid the best quality agricultural land in the village.</p> <p>The rest of the parish has been classified as Grade 3 agricultural land. It is uncertain whether this comprises land classified as Grade 3a land (i.e. the best and most versatile) or Grade 3b land (land which is not classified as such).</p>	2	1

**Option 1: Focus new development in Haughley village.**

**Option 2: Facilitate a more dispersed development strategy, which enables allocations to take place in Haughley village, Haughley New Street and Haughley Green.**

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Population and community	<p>Accessibility to amenities is a key determinant of residents' quality of life. In this respect Option 1 will facilitate development in closer proximity to Haughley village, which has the widest range of services and facilities in the Neighbourhood Plan area. This includes the primary school and pre-school, St Mary's Church, the Maxwell Charnley Community Room, a post office, a Co-op store, the Village Hall and King George V Playing Field. The option will also do more to support the vitality and viability of the village, and potentially deliver new community infrastructure. It will however preclude significant enhancements to amenities in Haughley New Street and Haughley Green.</p> <p>Both options will help deliver new housing in the Neighbourhood Plan area, helping to meet local needs. However, Option 2 may reduce the scope for delivering community benefits and affordable housing through spreading housing provision around the Neighbourhood Plan area.</p>	1	2
Health and Wellbeing	<p>Both options will support the location of housing provision with good access to the public rights of way network and the range of green infrastructure assets present locally. Both options will also locate housing which will be reliant on Stowmarket for health services.</p>	1	1
Transport	<p>Option 1 will focus new housing in Haughley village, which will help limit the need to travel to the range of services and facilities available in the village. It will also improve access to the bus services which serve the village. In this respect Option 2 is less likely to deliver housing in good proximity to the Neighbourhood Plan area's services and amenities and public transport links.</p>	1	2

### Summary of assessment

The assessment has highlighted that Option 1, which seeks to focus new housing provision in Haughley village, has most potential to support accessibility to amenities, and limit greenhouse gas emissions from transport. This is given the village has the broadest range of services and facilities in the Neighbourhood Plan area. The option also has increased potential to support the vitality and viability of the village.

Option 1 however has increased potential to lead to significant impacts on the historic environment. This is given the sensitivity of many parts of Haughley village, linked to the presence of the Haughley Conservation Area, over 30 listed buildings and a significant archaeological resource. The option also has increased potential to lead to the loss of land classified as the best and most versatile agricultural land (although it should be noted that recent detailed agricultural land classification has not been carried out in the Neighbourhood Plan area).

Option 2 would be more likely to support the vitality of Haughley New Street and Haughley Green. It is also likely to enable development to take place in less sensitive areas in terms of the historic environment, as well as avoid the loss of the best quality agricultural land in the Neighbourhood Plan area. However it would direct development to the locations of the Neighbourhood Plan area which are less accessible to services, amenities and public transport networks, and would do less to support community cohesion and the overall vitality of the Neighbourhood Plan area.

## Preferred approach in the Neighbourhood Plan in light of appraisal findings

4.22 In terms of the broad location of development to be taken forward through the HPNP, the Neighbourhood Plan Working Party took the decision to take forward an approach which reflects Option 1 above. This reflects a desire to support the vitality of Haughley village, which is the main settlement in the parish, and to deliver housing in the location with the broadest range of services, facilities and amenities in the Neighbourhood Plan area.

## Assessment of reasonable alternatives for development strategies

4.23 In light of the aim of the HPNP to deliver the majority of housing growth to the main settlement in the Neighbourhood Plan area, Haughley village, the Neighbourhood Plan Working Party has considered potential sites for allocation in the vicinity of the village.

4.24 The 2017 Babergh and Mid Suffolk Joint Local Plan Draft Strategic Housing & Economic Land Availability Assessment (SHELAA) considered sites in Haughley, assessed on the grounds of suitability, availability and achievability for housing.

4.25 The role of the SHELAA was to test whether (and where) there is sufficient land available to meet the full objectively assessed needs for housing and economic development in the district. The SHELAA undertook an initial assessment of sites and their development capacities and sites were identified through two rounds of 'call for sites' processes in 2014 and 2016 for the Joint Local Plan. Assessments of the sites identified their suitability, availability and achievability for development.

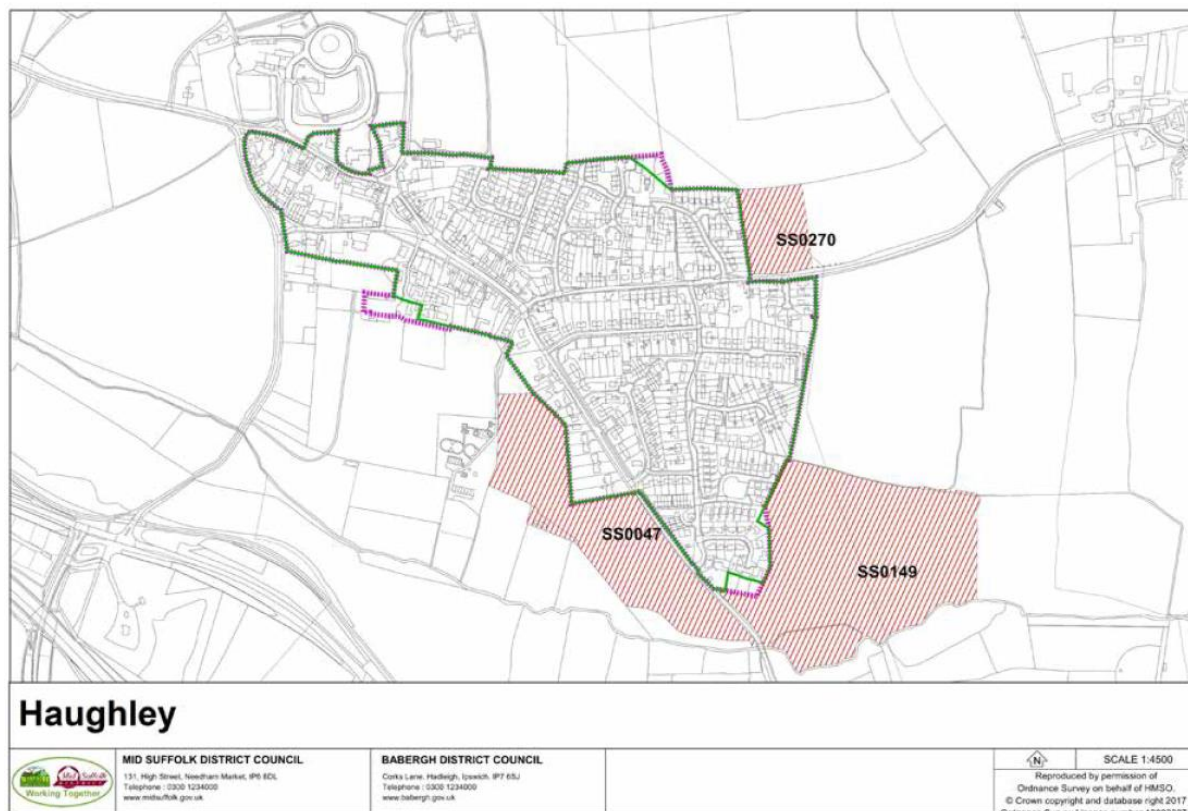
4.26 The Draft SHELAA considered a total of nine sites within the parish, of which three were accepted and six discounted. Sites identified as available and potentially suitable for residential development are presented in Table 4.2 below.

**Table 4.2: Sites Identified as suitable and available in the Babergh and Mid Suffolk Joint Local Plan Draft SHELAA**

Site Ref.	Site Address	Gross Area (Ha)	Estimated Dwellings Yield:
SS0047	Land to the west of Fishponds Way, Haughley	5.1	25 <sup>10</sup>
SS0149	Land east of Fishponds Way, Haughley	8	120
SS0270	Land to the north of Station Road	1.28	25

4.27 The location of these sites is presented below:

<sup>10</sup> The Draft SHELAA (2017) estimated that the yield for SS0047 is 25 dwellings, further to this assessment AECOM masterplanning work found that the site can accommodate up to 50 dwellings.



**Figure 4.1: Sites identified as suitable and available in the Babergh and Mid Suffolk JLP SHELAA<sup>11</sup>**

4.28 To support the development of a spatial strategy to deliver the proposed 50-60 homes through the Neighbourhood Plan, the SEA process has considered two options for delivering this indicative requirement. The options, which comprise different combinations of the three sites identified as suitable and available through the SHELAA process, are as follows:

- **Option A:** Delivery of the residual housing number through a single allocation on the Land east of Fishponds Way site
- **Option B:** Delivery of the residual housing number through a combination of allocations at 1) the Land west of Fishponds Way site and 2) the Land to the north of Station Road site

4.29 Table 4.3 presents the findings of the appraisal of Option A and Option B outlined above. To support the assessment findings, the options have been ranked in terms of their sustainability performance against the relevant SEA theme. It is anticipated that this will provide the reader with a likely indication of the comparative sustainability performance of the options in relation to each theme considered.

<sup>11</sup> From inset Map of Haughley, Appendix 4 settlement maps of Babergh & Mid Suffolk Joint Local Plan: Consultation Document August 2017

**Table 4.3: Appraisal findings: reasonable alternative for development strategies**

**Option A:** Delivery of the residual housing number through a single allocation on the Land east of Fishponds Way site

**Option B:** Delivery of the residual housing number through a combination of allocations at 1) the Land west of Fishponds Way site and 2) the Land to the north of Station Road site

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Option A	Option B
Biodiversity	<p>No internationally or nationally designated sites are present in the Neighbourhood Plan area, and there are also no SSSI Impact Risk Zones covering the Neighbourhood Plan area. Therefore the two options are unlikely to lead to significant effects on these sites. The County Wildlife Site present in the Neighbourhood Plan area is also located at Gallowsfield Wood, which is not in close proximity to the sites which would be allocated under the two options.</p> <p>The Land west of Fishponds Way site is located adjacent to an area of Deciduous Woodland Biodiversity Action Plan Priority Habitat, which is located to the south and west of the site. Similarly, the Land east of Fishponds Way site is located adjacent to an extension of the same woodland, which is also a Biodiversity Action Plan Priority Habitat. Whilst direct impacts on the woodland from landtake and fragmentation are not anticipated from development on these sites (and by extension through Option A and B), disturbance may take place from new development at these locations from noise, light pollution or trampling from enhanced access.</p>	=	=
Climate change	<p>Both options promote a spatial strategy which will allocate sites in good proximity to the services and facilities of Haughley village, including the primary school and pre-school, St Mary's Church, the Maxwell Charnley Community Room, a post office, a Co-op store, the Village Hall and King George V Playing Field. This will help limit greenhouse gas emissions from transport through encouraging new development in locations with closer proximity to key amenities and public transport networks.</p> <p>In relation to adapting to the effects of climate change, both the Land west of Fishponds Way site and the Land east of Fishponds Way site are located adjacent to an area of 'medium' fluvial flood risk, denoting each year these areas have a chance of flooding of between 1% and 3.3%. These areas are located on the southern boundaries of the sites. In terms of surface water flood risk, this covers a similar area as the areas of fluvial flood risk, with the addition of the western boundary of the Land west of Fishponds Way site and the eastern boundary of the Land east of Fishponds Way site. A very narrow band of surface water flood also follows the western boundary of the Land to the north of Station Road site.</p> <p>However, given that within site boundaries these areas of flood risk are limited, and can be readily avoided through new development areas, flood risk is unlikely to comprise a significant constraint to development at these locations.</p>	=	=

<p>Landscape and historic environment</p>	<p>In relation to <b>historic environment</b> constraints, the western part of Haughley village has the largest concentration of features and areas of historic interest in the Neighbourhood Plan area. This includes the Haughley Conservation Area, over 30 listed buildings and the scheduled monument of Haughley Castle.</p> <p>One of the sites considered under Option B, the Land west of Fishponds Way site, is located adjacent to the Haughley Conservation Area, an area listed on the Historic Environment Record as 'the Indicative area of Medieval town of Haughley', and is within 50m of the Grade II listed 'The Firs'. However this part of the site is well screened from the conservation area and the listed building by existing planting and trees. The remaining parts of the site are not constrained by historic environment considerations.</p> <p>The remaining sites considered under these options are all located away from key historic environment sensitivities in the village, and there are no heritage assets located within or adjacent to the sites. As such the sites are not within the wider setting of any designated heritage assets (including the Haughley Conservation Area). With the exception of Fishpond Bridge, which is located close to the southern edges of the Land east of Fishponds Way site and the Land west of Fishponds Way site, no features listed on the Historic Environment Record are present in the immediate vicinity of the sites.</p> <p>In terms of <b>landscape character</b>, both the Land west of Fishponds Way site and the Land east of Fishponds Way site are located adjacent to a Special Landscape Area, which covers the woodland to the south of the sites. This area has been defined as a 'wooded valley meadowland of the western tributaries of the upper Gipping valley in central Suffolk'.</p> <p>In relation to the Land west of Fishponds Way site, the Landscape and Visual Impact Assessment (LVIA) states that views into the site are considered of a medium sensitivity, contained and restricted by boundary planting. Development of the site has the potential to have a medium impact on the surrounding area. This impact however has potential to be contained due to the closed nature and natural screening of the site.</p> <p>With regard to the Land east of Fishponds Way site, site contains views across open countryside that are considered of medium to high sensitivity according to the LVIA. Development of the site has the potential to have a high impact on the surrounding area due to the open nature of the site. The LVIA finds that any substantial changes to the view will require careful consideration, taking into regard the openness and setting of the open countryside and wooded valley. The SHELAA also states there would be a townscape impact if whole site is developed. However, partial development concentrated along the western aspect of the site would reduce impact on existing townscape.</p> <p>Impacts on landscape character from the Land to the north of Station Road site would be more limited given its small size and relative containment in the landscape from existing development on Mill Fields and Station Road.</p> <p>Overall, given the increased landscape sensitivity of the Land east of Fishponds Way site, Option B is likely to perform more favourable in relation to this SEA theme.</p>	<p>2</p>	<p>1</p>
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Land, soil and water resources	No recent detailed agricultural land classification has been undertaken in the Neighbourhood Plan area. However the pre-1988 classification suggests that the Grade 2 land (which is land classified as the best and most versatile) present in the Neighbourhood Plan area is primarily located in the vicinity of Haughley village. Both options therefore have the potential to lead to the loss of the best quality agricultural land in the Neighbourhood Plan area.	=	=
Population and community	<p>Accessibility to amenities is a key determinant of residents' quality of life. In this respect both options will facilitate development in close proximity to the range of services and facilities in Haughley village. This includes the primary school and pre-school, St Mary's Church, the Maxwell Charnley Community Room, a post office, a Co-op store, the Village Hall and King George V Playing Field.</p> <p>Both options will help deliver new housing in the Neighbourhood Plan area, helping to meet local needs. However, Option A may reduce the scope for delivering community benefits and affordable housing via new development through spreading housing provision across two smaller sites.</p> <p>Both options have the potential to support the vitality and viability of the village.</p>	1	2
Health and Wellbeing	<p>Both options will support the location of housing provision with good access to the public rights of way network and the range of green infrastructure assets present locally. Both options will also locate housing which will be reliant on Stowmarket for health services.</p> <p>The land west of Fishponds Way site is adjacent to a wastewater treatment plant, whereby noise may impact on residential development abutting the plant. However it is recognised that the capacity and size of the site lends itself to a limitation of potential effects through new development.</p>	=	=
Transport	Both options will help limit the need to travel through delivering housing at locations with good access to the services and facilities available in Haughley village. The options will also support access to the bus services which serve the village.	=	=

### Summary of assessment

The assessment has highlighted that Option A, which seeks to deliver the Neighbourhood Plan area's residual housing requirement through a single allocation on the Land east of Fishponds Way site has increased potential to have significant impacts on landscape character in the vicinity of Haughley village. The option however, through focusing development on one site, may do more to facilitate community benefits through the delivery of on and off-site community infrastructure to support new housing provision.

In relation to potential impacts on biodiversity and land, soil and water resources, it is not possible to differentiate between the options at this level of detail. Both options are also likely to support the vitality and viability of Haughley village, facilitate housing delivery, and promote development at accessible locations in good proximity to the services and facilities available in the village.

## Current approach in the Neighbourhood Plan and the development of Neighbourhood Plan policies

### Current approach in the Neighbourhood Plan

4.30 The current version of the Neighbourhood Plan allocates two sites for housing in addition to the already approved Land East of King George V Playing Field site. These are as follows:

- Land at Station Road, east of Millfields: 18-31 new homes
- Land west of Fishponds Way: 25-50 new homes

4.31 This follows the consideration of the findings of the site assessments undertaken for the Neighbourhood Plan, consultation events, an ongoing consideration of viability and achievability and the SEA findings presented above.

### Neighbourhood Plan policies

4.32 To support the implementation of the vision for the Neighbourhood Plan, the submission version of the Haughley Parish Neighbourhood Plan puts forward 16 'policies and proposals' and seven 'community needs and desires' to guide new development within the Neighbourhood Plan area. These were developed following extensive community consultation and evidence gathering, and are as follows:

**Table 4.4: Haughley Parish Neighbourhood Plan Policies**

Reference Number	Name
<i>Policies and Proposals</i>	
Policy HAU1	Haughley Spatial Strategy
Policy HAU2	Housing Developments within Settlement Boundaries
Policy HAU3	New Homes at Land East of King George V Playing Field
Policy HAU4	Land at Station Road East of Millfields
Policy HAU5	Land at West of Fishponds Way
Policy HAU6	Sites for Commercial and Industrial Development
Policy HAU7	Protection of Employment and Existing Businesses
Policy HAU8	Broadband
Policy HAU9	Development Affecting Haughley's Historic Environment
Policy HAU10	Possible New Development in the Conservation Area
Policy HAU11	Development Design and Character
Policy HAU12	Protection of Local Community Facilities
Policy HAU13	Provision of new Retail and Community Facilities
Policy HAU14	Protection of Local Green Spaces
Policy HAU15	Protection of Rural Landscape



**Reference  
Number**

**Name**

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Policy HAU16	Rights of Way and Access
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*Community Needs and Desires*

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CND1	Haughley Crawford's School
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CND2	King George V Playing Field and Ron Crascall Pavillion
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CND3	Cemetery Space
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CND4	Traffic Calming Haughley Crawford's School
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CND5	Fishponds Way Footpath
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CND6	Haughley Green Footpath
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CND7	Central Haughley Traffic Calming and Safety
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## 5. What are the appraisal findings at this current stage?

### Introduction

- 5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the submission version of the Haughley Parish Neighbourhood Plan. This chapter presents:
- An appraisal of the current version of the HPNP under the seven SEA theme headings; and
  - The overall conclusions at this current stage and recommendations for the next stage of plan-making.

### Approach to the appraisal

- 5.2 The appraisal is structured under the seven SEA themes taken forward for the purposes of the SEA.
- 5.3 For each theme, 'significant effects' of the current version of the plan 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 plan. 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 ensure 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.

### Biodiversity and Geodiversity

- 5.5 The Neighbourhood Plan area is relatively unconstrained in biodiversity terms, and does not overlap with the boundaries of any European or nationally designated sites. Additionally, Haughley is not located within a Site of Special Scientific Interest Impact Risk Zone for the type of development proposed in the Neighbourhood Plan area. In the local context, areas of Deciduous Woodland Biodiversity Action Plan (BAP) Priority Habitat are primarily located within proximity to the Haughley Watercourse in the southern half of the Neighbourhood Plan area. One of these areas, 'Gallowsfield Wood', is recognised as a County Wildlife Site.
- 5.6 Whilst no significant negative effects on biodiversity can be readily identified, there will be a need for potential effects on biodiversity linked to the proposed allocations in the Neighbourhood Plan (see Policies HAU3, HAU4 and HAU5) to be avoided and mitigated. Therefore, the Neighbourhood Plan sets out provisions which will 1) help limit potential effects from new development on features and areas of biodiversity interest in the Neighbourhood Plan area and 2) support the resilience of ecological networks. For example, Policy HAU15 'Protection of Rural Landscape' states that there is a need to protect the environment and landscape value of the areas located outside of settlement boundaries, with Policy HAU11 'Development Design and Character' affirming that proposals must not lead to the loss of an area which makes a significant contribution to public amenity by virtue of its open space and character. Also, recognising that the 'Land at West of Fishponds Way' allocation adjoins an area of Deciduous Woodland BAP Priority Habitat (located along the southern and south western site boundaries), Policy HAU5 supports on site green infrastructure enhancements.

- 5.7 Similarly, in regards to the proposed allocation on 'Land East of King George V Playing Field' through the Neighbourhood Plan (see Policy HAU3), condition 15 within the decision notice for application 'DC/17/04113' states that no development shall take place until a biodiversity enhancement plan has been submitted for approval by the Local Planning Authority in order to reasonably minimise any potential ecological impacts of the proposal. It is anticipated that a similar condition will be attached to any applications which come forward on 'Land at Station Road East of Millfields (Policy HAU4) and 'Land at West of Fishponds Way' (Policy HAU5)
- 5.8 Additionally, it is important to acknowledge that existing and emerging Local Plan policies provide an additional layer of protection to ecological networks within the Neighbourhood Plan area.

## Climate Change

- 5.9 In terms of climate change mitigation, road transport is an increasingly significant contributor to greenhouse gas emissions in the Neighbourhood Plan area. Based on the 2011 census data, the most popular method of travelling to work in the Neighbourhood Plan area is via driving, with over 81% of residents having access to at least one car or van. Supporting modal shift, Policy HAU11 'Development Design and Character' states that all new developments will be required to include measures to facilitate and encourage walking and cycling, wherever possible. Additionally, Policy HAU3 'New Homes at Land East of King George V Playing Field', Policy HAU4 'Land at Station Road East of Millfields' and Policy HAU5 'Land at West of Fishponds Way' affirm that the proposed allocations in the Neighbourhood Plan area will include new pedestrian linkages to enable residents to walk to all facilities within the village centre, whilst also retaining and improving connections to the Public Rights of Way (PRoW) network. This will support a limitation of greenhouse gas emissions in the Neighbourhood Plan area by encouraging alternative options of transportation, particularly for undertaking day-to-day activities.
- 5.10 With regard to the design of new developments, Policy HAU11 also encourages proposals which incorporate features that reduce carbon emissions, including through energy efficiency measures and/or green energy generation. These measures will also support climate change mitigation, with the potential for long term positive effects.
- 5.11 In terms of climate change adaptation, the provisions of the National Planning Policy Framework will help address potential flood risk issues in the Neighbourhood Plan area. Out of the three proposed allocations, 'Land at West of Fishponds Way' (see Policy HAU5) overlaps with areas at highest risk of flooding (Flood Risk Zone 2 and 3), as shown in Appendix C of the most recently completed Level 1 Strategic Flood Risk Assessment for Mid Suffolk<sup>12</sup>. However, these areas are contained along the southern and western boundaries and do not significantly encroach onto site, with Policy HAU5 also seeking to ensure that the risks of flooding will be fully assessed prior to development. 'Land East of King George V Playing Field (Policy HAU4) and 'Land at Station Road East of Millfields' (Policy HAU5) are located within areas which have a low probability of flooding (Flood Risk Zone 1).
- 5.12 Policy HAU1 'Haughley's Spatial Strategy' and Policy HAU2 'Housing Developments within Settlement Boundaries' seeks to ensure that necessary drainage infrastructure is in place to serve new development areas. Therefore the provisions of these policies should help prevent any significant increases in surface water flooding issues experienced in the Neighbourhood Plan area. Furthermore, Policy HAU15 'Protection of Rural Landscape' and Policy HAU11 aim to safeguard areas of open spaces within the Neighbourhood Plan area, whilst Policy HAU3, Policy HAU4 and Policy HAU5 outline that opportunities will be taken to provide additional outdoor green spaces within new developments. These policies support the protection of natural carbon sequestrators located within the landscape (i.e. trees and hedgerows) and will also positively

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<sup>12</sup> Mid Suffolk District Council (2008): SFRA Appendix C: 'Flood Risk Map for Haughley', [online] available to download via: <https://www.midsuffolk.gov.uk/planning/planning-policy/evidence-base/historic-evidence-base/mid-suffolk-strategic-flood-risk-assessment-2008/> last accessed [13/12/18]

respond to the potential effects of climate change (particularly from extreme weather events) through providing summer shading and reducing surface water run-off.

## Landscape and Historic Environment

5.13 In regards to landscape and visual considerations, the Neighbourhood Plan area does not overlap with a nationally designated landscape. A Landscape and Visual Impact Assessment<sup>13</sup> (LVIA) for Haughley Parish was completed in March 2018 to support the preparation of the Neighbourhood Plan and determine the sensitivities and constraints at the local level. Out of the 17 viewpoints in the LVIA which are considered to represent the principal views towards the settlement from the surrounding lanes and public rights of way (PRoW), the proposed allocations in the Neighbourhood Plan have the potential to directly impact upon three of them, as follows:

- Viewpoint 5: 'View west from Station Road towards the eastern gateway to Haughley Village' (see Policy HAU4, Proposal Map PM2 and Proposal Map PM7);
- Viewpoint 8: 'View towards Haughley Village from Bacton Road' (see Policy HAU3, Proposal Map PM2 and Proposal Map PM7); and
- Viewpoint 13: 'View from Fishponds Way looking north towards the village gateway after Fishpond Bridge' (see Policy HAU5, Proposal Map PM2 and Proposal Map PM7).

5.14 The LVIA concludes that viewpoints 5 and 13 are of 'medium sensitivity' to change, whilst viewpoint 8 is 'highly sensitive' to change. In this regard, Policy HAU3 'New Homes at Land East of King George V Playing Field' seeks to ensure that the development will incorporate a high quality design which respects the setting of the site and the local vernacular architecture. Additionally, Policy HAU15 'Protection of Rural Landscape' states that new developments will be expected to minimise impacts on the landscape and enhance landscape character wherever possible in order to protect visually important areas. This is reinforced through Policy HAU2 'Housing Developments within Settlement Boundaries' and Policy HAU11 'Development Design and Character' which suggest that new developments will be supported when they are suitable in terms of overall design and appearance (including size, scale and layout) and if they would make a positive contribution to local identity, sense of place and to the surrounding environment. Therefore, these policies take a pro-active and positive approach to protecting and enhancing the distinctive character and visual amenity of the Neighbourhood Plan area.

5.15 The proposed allocations in the Neighbourhood Plan are located adjacent to the existing built-up areas of Haughley, as shown on Proposal Map PM2. This will support the limitation of effects on the open countryside. This is supported by Policy HAU11, which aims to safeguard open spaces within the Neighbourhood Plan area, with Policy HAU1 'Haughley's Spatial Strategy' supportive of proposals which protect and enhance local features of green space, landscape, ecological or historical importance. The provision of these policies will ensure that proposals respect the special qualities of Haughley, while also helping to ensure that the open countryside is safeguarded from high levels of inappropriate development.

5.16 The Neighbourhood Plan area has a rich historic environment, recognised through the diversity of features and areas that are nationally and locally designated for their cultural heritage interest, including two Grade I, one Grade II\* and 65 Grade II listed buildings, 'Haughley Castle' Scheduled Monument, and Haughley Conservation Area. This is reflected by Neighbourhood Plan policies which have a strong focus on conserving and enhancing the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their settings. For example, Policy HAU9 'Development affecting Haughley's Historic Environment' outlines that proposals should (amongst other considerations):

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<sup>13</sup> Haughley Parish Council (2018): 'Landscape and Visual Impact Assessment for Haughley Parish', [online] available to download via: <<https://www.haughley.org.uk/parish-neighbourhood-plan/>> last accessed [13/12/18]

- Preserve or enhance the significance of heritage assets in the village, demonstrating a clear understanding of their setting within the wider village;
- Prevent substantial harm or loss of a Grade I or Grade II listed building, or to a scheduled monument unless the circumstances are wholly exceptional; and
- Retain buildings and spaces, the loss of which would cause harm to the character and appearance of Haughley Conservation Area (further supported by Policy HAU10 'Possible New Development in the Conservation Area).

5.17 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 parish archaeological resource is also an important element of the historic environment. In this regard, the Historic Environment Record for Suffolk<sup>14</sup> contains 58 listings within the parish of Haughley, including buildings, ringed ditches, Neolithic and medieval artefacts, and archaeological finds. In this context, Policy HAU9 states that proposals will be supported where they seek to engage with Suffolk County Council's Archaeology Service in order to undertake assessments of archaeological potential at an appropriate stage in the design of new developments. Notably, 'Land at West of Fishponds Way' (see Policy HAU5) is acknowledged as being located in a favourable location for archaeological activity, on a south facing slope overlooking the Haughley Watercourse. The Neighbourhood Plan states that a number of cropmark ring ditches (likely to represent the sites of Bronze Age burial mounds), Roman, and medieval finds have been recorded in this area. Therefore, Policy HAU5 confirms that an archaeological assessment will be required to be carried out prior to development. This will help ensure that provisions are made for the preservation of important below-ground archaeological remains and/or findings.

5.18 Completed in March 2018, the Heritage and Settlement Sensitivity Assessment<sup>15</sup> for Mid Suffolk states that the northern areas of Haughley are highly sensitive to change, due to the presence of heritage assets and important viewpoints. Comparatively, the southern and south eastern areas of the settlement is largely characterised by modern development, and are considered to be of lesser significance. In terms of the proposed allocations in the Neighbourhood Plan area, two of the three sites are located within the southern and south eastern areas of the settlement, while 'Land East of King George V Playing Field' (see Policy HAU3) is located in the northern area. Recognising the sensitivity of this site, the decision notice for outline planning application 'DC/17/04113'<sup>16</sup> for 98 new dwellings contains a number of conditions which will need to be discharged prior to construction, including a programme of archaeological works and a landscaping scheme. Additionally, the notice acknowledges that the policies within the Neighbourhood Plan are also relevant to the decision.

5.19 Overall, the policies within the Neighbourhood Plan take a proactive approach in conserving and enhancing the distinctive character and heritage interests of Haughley. Furthermore, the provisions of Local Plan policies and the Haughley Conservation Area Appraisal<sup>17</sup> provide additional layers of protection in relation to the historic environment and landscape character.

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<sup>14</sup> Heritage Gateway (2018): 'Suffolk Historic Environment Record', [online] available to access via: <<http://www.heritagegateway.org.uk/Gateway/Results.aspx>> last accessed [11/12/18]

<sup>15</sup> Babergh District Council and Mid Suffolk District Council (2018): 'Heritage and Settlement Sensitivity – Appendix 2 – Mid Suffolk Assessments', [online] available to download via: <<https://www.midsuffolk.gov.uk/planning/planning-policy/evidence-base/current-evidence/>> last accessed [13/12/18]

<sup>16</sup> Babergh District Council and Mid Suffolk District Council Planning Portal: DC/17/04113 'Outline Planning Application for the erection of 98 dwellings (including 34 affordable homes), provision of a junior football pitch, areas of public open space and off site highway improvements on Land East of King George's Field, Green Road, Haughley, IP14 3RA'

<sup>17</sup> Babergh District Council and Mid Suffolk District Council (2008): 'Haughley Conservation Area Appraisal', [online] available to download via: <<https://www.babergh.gov.uk/planning/heritage/conservation-area-appraisals/>> last accessed [13/12/18]

## Land, Soil and Water Resources

- 5.20 In terms of the location of the best and most versatile (BMV) agricultural land, Natural England's regional agricultural land classification (ALC) mapping for eastern England<sup>18</sup> confirms that the entirety of the Neighbourhood Plan area is underlain by either Grade 2 or Grade 3 Agricultural Land. Therefore, the proposed allocations in the Neighbourhood Plan have the potential to lead to the permanent loss of BMV agricultural land. However, in the absence of a detailed and recent ALC assessment at these locations, it is currently uncertain the extent to which the best and most versatile agricultural land will be lost through the proposed residential allocations.
- 5.21 Policy HAU6 'Sites for Commercial and Industrial Development' is supportive of proposals of this nature providing that they are located on brownfield sites in the Neighbourhood Plan area (as identified on Proposal Map PM5 and Proposal Map PM6). The policy therefore promotes the efficient use of land within the Neighbourhood Plan area, also enabling the remediation of potentially contaminated land at these locations. Similarly, in regards to the proposed allocation on 'Land East of King George V Playing Field' (see Policy HAU3), condition 3 within the decision notice for application 'DC/17/04113' states that no development shall take place until a strategy for investigating any contamination present on site has been submitted for approval by the Local Planning Authority, with any appropriate remediation works carried out in order to minimise the risks to sensitive environmental receptors. It is expected that a similar condition will be attached to any applications which come forward on 'Land at Station Road East of Millfields' (Policy HAU4) and 'Land at West of Fishponds Way' (Policy HAU5), in line with national and local policies concerning the assessment of potentially contaminated land.
- 5.22 In regards to the water resources in the Neighbourhood Plan area, the Environment Agency's (EA) Catchment Data Explorer<sup>19</sup> highlights that the 'Haughley Watercourse' (a tributary of the River Gipping) passes through the southern section of the Neighbourhood Plan area. Based on the most recently completed water quality assessments undertaken in 2016, the Haughley Watercourse received a 'moderate quality' status. The main reasons for not achieving good status (RNAGs) in the assessment were attributed to the following three sectors (as defined by the EA): water industry (point source sewage discharge), agriculture and rural land management (livestock/nutrient runoff) and urban and transport (drainage and sewage treatment). In this context, Policies HAU3, HAU4 and HAU5 outline that opportunities will be taken to initiate open space and green infrastructure enhancements. Policy HAU1 'Haughley's Spatial Strategy' and Policy HAU11 'Development Design and Character' also suggest that new developments will be supported if there is necessary drainage infrastructure in place to serve them. Therefore, the Neighbourhood Plan will support and encourage strategies to tackle RNAGs and indirectly support water quality improvements through reducing the amount of suspended solids entering into watercourses from surface water run-off. Furthermore, these policies will positively contribute to the Water Framework Directive's objective of achieving 'good status' for as many watercourses as possible by 2027.
- 5.23 The EA also states that groundwater source protection zones (SPZs) such as wells, boreholes and springs provide a significant supply of public drinking water. Particularly, development proposals within SPZs have a higher potential to cause contamination in these areas. The entirety of the Neighbourhood Plan area is located within SPZ III (Total Catchment) and overlies a principal and secondary aquifer, which also creates vulnerability between groundwater and development. In this context, Policies HAU3, HAU4 and HAU5 also seek to ensure that the potential impact of development on Anglian Water's existing infrastructure will be assessed and given consideration.

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<sup>18</sup> Natural England (2011): 'ALC map Eastern Region (ALC008)', [online] available to download via:

<<http://publications.naturalengland.org.uk/publication/127056?category=5954148537204736>> last accessed [13/12/18]

<sup>19</sup> Environment Agency (2018): 'Catchment Data Explorer – Haughley Watercourse Overview', [online] available to access via: <<http://environment.data.gov.uk/catchment-planning/WaterBody/GB105035046190>> last accessed [13/12/18]



## Population and Community

- 5.24 Under the emerging Joint Local Plan (JLP) for Babergh and Mid Suffolk, Mid Suffolk has a residual need for new housing between 2017 and 2036 of 5,820 new dwellings. Haughley is defined as a 'core village' within the emerging JLP, with these areas containing a high level of services and facilities that are judged to be of importance in relation to sustainability and vitality of the local community. In the absence of a specific housing target for Haughley, the Neighbourhood Plan Working Party propose a target of 150 dwellings over the plan period.
- 5.25 In order to meet the target of 150 dwellings, the Neighbourhood Plan contains three proposed allocations for residential development within Haughley:
- Policy HAU3: New Homes at Land East of King George V Playing Field (98 dwellings);
  - Policy HAU4: Land at Station Road East of Millfields (18-31 dwellings); and
  - Policy HAU5: Land at West of Fishponds Way (25-50 homes).
- 5.26 Outline planning permission for 98 dwellings was granted by Mid Suffolk District Council on 'Land East of King George V Playing Field' in May 2018. The Neighbourhood Plan reinforces this decision through Policy HAU3, expecting that proposals should have regard to housing needs arising locally in terms of size, type and tenure. Decision notice 'DC/17/04113' for the application also confirms that Neighbourhood Plan policies are relevant to the decision, and should therefore be considered during the evolution of the design.
- 5.27 Accessibility to amenities is a key determinant of residents' quality of life. In this respect the proposed allocations facilitate development in good proximity to the range of services and facilities in Haughley village. This includes the primary school and pre-school, St Mary's Church, the Maxwell Charnley Community Room, a post office, a Co-op store, the Village Hall and King George V Playing Field. The delivery of 150 homes will also support the vitality and viability of the village through supporting these amenities.
- 5.28 Policy HAU11 'Development Design and Character' states that all new developments will be expected to enhance the positive attributes of the village and local design features. Policy HAU12 'Protection of Local Community Facilities' aims to safeguard these assets from change of use unless it can be demonstrated that equivalent or better provision can be made elsewhere (with support from Policy HAU13 'Provision of New Retail and Community Facilities') or whether it can be demonstrated that there is no longer a demand for the existing facility. Furthermore, Policy HAU14 'Protection of Local Green Spaces' recognises the importance of retaining the open spaces in Haughley shown on the Proposal Map PM2 and Proposal Map PM3. As such the provision of these policies will enhance the quality of life for local residents, whilst also facilitating improvements to the public realm, community identity and sense of place. This is further supported by the aspirations of the Community Needs and Desires (CND) in the Neighbourhood Plan, particularly CND1 'Haughley Crawford's School', CND2 'King George V Playing Field and Ron Crascall Pavilion' and CND3 'Cemetery Space'.
- 5.29 A number of policies within the Neighbourhood Plan aim to safeguard and enhance the prospects for employment locally. For example, Policy HAU6 'Sites for Commercial and Industrial Development' is supportive of employment opportunities providing that they are located on brownfield sites in the Neighbourhood Plan area (as identified on Proposal Map PM5 and Proposal Map PM6). Policy HAU7 'Protection of Employment and Existing Businesses' also aims to prevent the loss of these areas. Additionally, Policy HAU8 'Broadband' supports knowledge-based businesses and the digital economy by seeking to ensure good access to high speed broadband and evolving communication technologies for businesses and home workers, whilst also promoting flexible working practices.

## Health and Wellbeing

- 5.30 Reflecting the results of the Joint Strategic Needs Assessment (JSNA), the four key outcomes within the Joint Health and Wellbeing Strategy for Suffolk (2016-2019)<sup>20</sup> aim to:
- Ensure that every child has the best start in life;
  - Improve independence for those with physical and learning disabilities;
  - Enhance the quality of life for older residents; and
  - Promote opportunities for people to improve their mental health and wellbeing.
- 5.31 In this context, the policies contained within the Neighbourhood Plan will bring a range of benefits for the health and wellbeing of residents in Haughley, as well as addressing some of the key outcomes within the health and wellbeing strategy. For example, Policy HAU11 'Development Design and Character' states that development proposals will not be supported if they would cause detrimental effects on residential amenity by reason of noise or other nuisance. Policy HAU1 'Haughley's Spatial Strategy' confirms the developments will be permitted where they would protect and enhance local features of green space, landscape, ecological or historic importance. Furthermore, the proposed allocations in the Neighbourhood Plan (see Policy HAU3, HAU4 and HAU5) will be required to provide new pedestrian linkages to enable residents to walk to local services and facilities, whilst also retaining and improving connections to the PRoW network.
- 5.32 A key impact of the policies relating to health and wellbeing within the Neighbourhood Plan will be through protecting and enhancing the area's built and natural environment. Policy HAU2 'Housing Developments within Settlement Boundaries' confirms that development proposals will be supported where (amongst other considerations) they are of a high standard of design, make a positive contribution to the surrounding environment and rural landscape, and reflect the role and function of Haughley village. Policy HAU14 'Protection of Local Green Spaces' recognises the importance of safeguarding locally important open spaces, with Policy HAU15 'Protection of Rural Landscape' resisting developments that would negatively impact upon landscape character and/or visual amenity. This will support the quality of life of residents, and promote healthier lifestyles.
- 5.33 Furthermore, the quality and availability of housing is an important contributor to health and wellbeing. As discussed under the 'Population and Communities' theme, the proposed allocations aim to provide an appropriate mix of housing types, sizes and tenures in order to meet the identified needs arising locally. The proposed allocations will also include a percentage of affordable housing. Along with the provisions of Policy HAU11 'Development Design and Character', it is expected that the Neighbourhood Plan will facilitate high quality housing which helps meet the needs of local people.

## Transportation

- 5.34 Based on the 2011 census data, the most popular method of travelling to work in the Neighbourhood Plan area is via driving, with over 81% of residents having access to at least one car or van. In this respect there is a need to encourage modal shift from the reliance on privately owned vehicles towards sustainable modes of transport, whilst also ensuring that new development proposals support access to local services and facilities. In this respect the proposed spatial strategy for the HPNP will help limit the need to travel through delivering housing at locations with good access to the services and facilities available in Haughley village. It will also support access to the bus services which serve the village.

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<sup>20</sup> Suffolk County Council (2016): 'Joint Health and Wellbeing Strategy for Suffolk', [online] available to download via: <https://www.suffolk.gov.uk/council-and-democracy/the-council-and-its-committees/committees/suffolk-health-and-wellbeing-board/> last accessed [13/12/18]



- 5.35 Policy HAU16 'Rights of Way and Access' states that all new housing and business developments will be expected to facilitate the use of the path and bridleway network around Haughley. Additionally, the proposed allocations in the Neighbourhood Plan (see Policies HAU3, HAU4 and HAU5) will include new pedestrian linkages to enable residents to walk to all facilities within the village centre, whilst also retaining and improving connections to the PRoW network. This is further supported by the aspirations of the Community Needs and Desires (CND) in the Neighbourhood Plan, particularly CND5 'Fishponds Way Footpath' and CND6 'Haughley Green Footpath'.
- 5.36 A number of policies in the Neighbourhood Plan aim to tackle traffic and congestion issues within Haughley. For example, Policy HAU11 'Development Design and Character' outlines support for development proposals which include adequate parking spaces to the minimum standard contained with the Suffolk Guidance for Parking. This is reaffirmed through the proposed allocations (see Policies HAU3, HAU4 and HAU5). Furthermore, Policy HAU13 'Provision of new Retail and Community Facilities' states that off-road car parking in the central part of Haughley village should be considered as part of any proposals in order to prevent traffic management problems, aligning with CND7 'Haughley Traffic Calming and Safety'

## Conclusions at this current stage

- 5.37 The assessment has concluded that the current version of the Neighbourhood Plan is likely to lead to significant positive effects in relation to the 'Population and Community' SEA theme. This relates to the focus of the Neighbourhood Plan on the delivery of housing to meet local needs, its impetus on enhancing community vitality and on supporting accessibility to services, facilities and public transport networks. The Neighbourhood Plan is also likely to lead to significant positive effects in relation to the 'Health and Wellbeing' SEA theme, linked to its promotion of improved walking and cycling networks, enhancements to green infrastructure and open space provision, and the facilitation of high quality and sustainable design.
- 5.38 The Neighbourhood Plan will also bring positive effects in relation to the 'Landscape and Historic Environment' SEA theme. These benefits largely relate to the Neighbourhood Plan's focus on protecting local character, conserving and enhancing historic environment assets and their settings, and supporting the quality of the public realm. In addition the HPNP will bring positive effects in relation to the 'Biodiversity' SEA theme. However, given the approaches taken forward through the Neighbourhood Plan will help limit potential effects from new development areas rather than secure significant enhancements, these impacts are unlikely to comprise significant positive effects overall.
- 5.39 With regard to the 'Land, Soil and Water Resources' SEA theme, the Neighbourhood Plan may have the potential to lead to significant negative effects relating to the potential loss of the best and most versatile agricultural land. However this is uncertain given recent agricultural land classification has not been undertaken at the locations which have been allocated for new development through the Neighbourhood Plan.
- 5.40 The Neighbourhood Plan will also initiate a number of beneficial approaches regarding the 'Climate Change' and 'Transportation' SEA themes. 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.

## 6. What are the next steps?

- 6.1 This Environmental Report accompanies the Neighbourhood Plan for submission to the Local Planning Authority, Mid Suffolk District Council, for Independent Examination.
- 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 current adopted Local Plan document for Mid Suffolk.
- 6.3 If the Independent Examination is favourable, the HPNP 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 HPNP will become part of the Development Plan for Haughley Parish.

# Appendix A Context Review and Baseline

## Air Quality

### Context Review

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

- *'Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.'*
- *'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.'*
- 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'<sup>21</sup> 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.

### Summary of current baseline

Mid Suffolk District Council is required to monitor air quality across the district under Section 82 of the Environment Act (1995), report regularly to Defra and take action where nationally set levels are likely to be exceeded. Monitoring is undertaken to assess levels of nitrogen dioxide (NO<sub>2</sub>), sulphur dioxide, ozone, benzene and particulates. Where exceedances exist, areas are declared as Air Quality Management Areas (AQMAs) and local authorities are required to produce an Air Quality Action Plan (AQAP) to improve air quality in the area.

As of September 2016, there are no Air Quality Management Areas (AQMAs) within the Neighbourhood Plan area or in the wider Mid Suffolk district, as highlighted in the 2016 Local Air Quality Management (LAQM) Annual Status Report<sup>22</sup>. The concentration of nitrogen dioxide (NO<sub>2</sub>) has reduced within the Mid Suffolk District between 2010 and 2015.

### Summary of future baseline

Whilst no significant air quality issues currently exist within the Haughley Parish Neighbourhood Plan area, new housing and employment provision within the Parish and the wider area, including through the emerging Joint Local Plan, has the potential for adverse effects on air quality through increasing

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<sup>21</sup> HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf) [accessed 29/08/18]

<sup>22</sup> Babergh and Mid Suffolk District Council (2016): 'LAQM Annual Status Report', [online] available at: <<https://www.babergh.gov.uk/assets/Environment/2016-Annual-Status-Report.pdf>> last accessed [19/09/18]

traffic flows and associated levels of pollutants such as NO<sub>2</sub>. However, baseline levels of air pollutants are low within the area and as such significant issues are not currently anticipated.

## Biodiversity and Geodiversity

### Context Review

At the European level, the EU Biodiversity Strategy<sup>23</sup> 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:

- One of the three overarching objectives of the NPPF is an environmental objective to '*contribute to protecting and enhancing our natural, built and historic environment*' including by '*helping to improve biodiversity*'.
- '*Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value[...], take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.*'
- '*Planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with the statutory status or identified quality in the development plan); and minimising impacts on and providing net gains for biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures.*'
- '*To protect and enhance biodiversity and geodiversity, plans should:*
  - a) '*Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
  - b) '*Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity*'.

The Natural Environment White Paper (NEWP)<sup>24</sup> 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

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<sup>23</sup> 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](http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP_resolution_april2012.pdf)> last accessed [27/06/18]

<sup>24</sup> 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 [19/09/18]

- 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 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 people'*<sup>25</sup>.

The recently published 25 Year Environment Plan<sup>26</sup> 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; and
- Protecting and improving the global environment.

In this context, 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' directly relate to the Biodiversity SEA theme.

- At the local level, a key objective of the Mid Suffolk Core Strategy<sup>27</sup> is 'to protect, manage, enhance and restore the landscape, biodiversity and geodiversity of the District'. Policy CS 5 of the Strategy: Mid Suffolk's Environment also relates to the Biodiversity SEA theme.

### Summary of current baseline

There are no nationally or internationally designated biodiversity sites located within or adjacent to the Neighbourhood Plan area. There also no SSSI impact risk zones covering the Neighbourhood Plan area.

There is one County Wildlife Site within the Parish which is Gallowsfield Wood consisting of 20 acres of woodland and open space just north of the A14.

Other locally important sites include a network of BAP priority habitats. A small patch of good quality semi-improved grassland lies in the north of the Parish next to Shrub Farm. Coastal and floodplain grazing marsh and lowland meadows lie on the south east border of the Parish next to the River Rat. Deciduous woodland is scattered throughout the Parish, but predominantly in the southern half of the Parish. There is also a small patch of Good Quality Semi-improved Grassland in the north of the Parish. In the south east, some lowland meadows and coastal and floodplain grazing marsh are present.

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<sup>25</sup> 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 [19/09/18]

<sup>26</sup> HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf) [accessed 19/09/18]

<sup>27</sup> Mid Suffolk District (2008) Core Strategy Development Plan Document [online] available at: <<https://www.midsuffolk.gov.uk/assets/CIL-and-S106-Documents/Pre-Adoption-Documents-Mid-Suffolk/Core-Strategy-with-CSFR-label-and-insert-sheet-07-01-13.pdf>> [last accessed 19/09/18]



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**LEGEND**

-  Haughley Parish Neighbourhood Plan Area

**Biodiversity Action Plan Priority Habitats**

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

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Purpose of Issue **DRAFT**

Client **HAUGHLEY PARISH NEIGHBOURHOOD PLAN WORKING PARTY**

Project Title **SEA FOR THE HAUGHLEY PARISH NEIGHBOURHOOD PLAN**

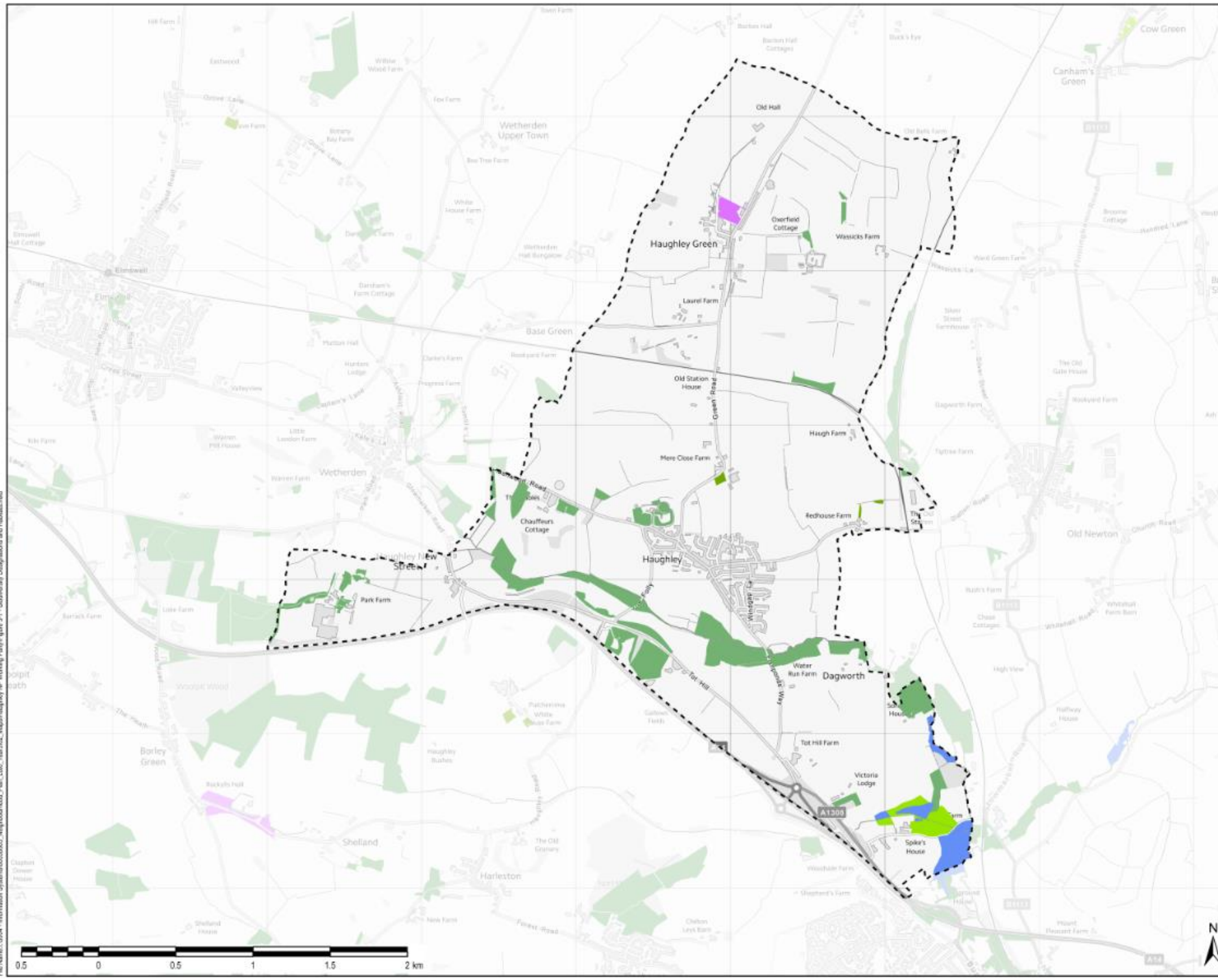
Drawing Title **BIODIVERSITY DESIGNATIONS AND HABITATS**

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**AECOM**  
 4th Floor  
 One Canada Square  
 Canary Wharf  
 London E14 5AB  
 Tel: 020 7592 0200  
 Fax: 0208 286000  
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Drawing Number **FIGURE 3.1** Rev **01**



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## Summary of future baseline

Habitats and species will potentially face increasing pressures from future development within the Neighbourhood Plan area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change, which has the potential to lead to changes in the distribution and abundance of species and changes to the composition and character of habitats.

Benefits for biodiversity have the potential to arise from the increasing integration of biodiversity considerations within decision making through policies within the Local Plan and local initiatives for biodiversity enhancements.

## Climate Change

### Context Review

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 below<sup>28</sup>:

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

The UK Climate Change Act<sup>29</sup> 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:

- 2050 Target. 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.

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<sup>28</sup> 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 [20/09/18]

<sup>29</sup> GOV.UK (2008): 'Climate Change Act 2008', [online] accessible via <<http://www.legislation.gov.uk/ukpga/2008/27/contents>> last accessed [19/09/18]

- 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 page 30.
- Key messages from the National Planning Policy Framework (NPPF) include:
- One of the three overarching objectives of the NPPF is an environmental objective to *'contribute to protecting and enhancing our natural, built and historic environment'* including by *'mitigating and adapting to climate change'* and *'moving to a low carbon economy.'* *'The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.'*
- *'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.'*
- *'Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.'*
- Direct development away from areas at highest risk of flooding (whether existing or future). *'Where development is necessary, it should be made safe for its lifetime without increasing flood risk elsewhere.'*

The Flood and Water Management Act<sup>31</sup> 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);
- 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).<sup>32</sup>

Further guidance is provided in the document 'Planning for SuDS'.<sup>33</sup> 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'.

- At the local level, the following policies within the Mid Suffolk Core Strategy<sup>34</sup> directly relate to the Climate Change SEA theme:

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<sup>30</sup> 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 [19/09/18]

<sup>31</sup> Flood and Water Management Act (2010) [online] available at: <<http://www.legislation.gov.uk/ukpga/2010/29/contents>> last accessed [19/09/18]

<sup>32</sup> 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.

<sup>33</sup> 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](http://www.ciria.org/Resources/Free_publications/Planning_for_SuDS_ma.aspx)> last accessed [19/09/18]



- Policy CS 3: Reduce contributions to Climate Change
- Policy CS 4: Adapting to Climate Change

### Summary of current baseline

#### *Contribution to climate change*

In relation to greenhouse gas emissions, source data from the Department of Energy and Climate Change<sup>35</sup> suggests that Mid Sussex has higher per capita emissions to the East of England and England as a whole since 2005. Mid Sussex has also seen a 31.9% reduction in the percentage of total emissions per capita between 2005 and 2016, lower than the reductions for the East of England (33.3%) and England (37.6%).

#### *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) team<sup>36</sup>. 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 scenario<sup>37</sup> 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. These include:

- Effects on water resources from climate change;
- Reduction in availability of groundwater for abstraction;
- 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;
- A need to increase the capacity of wastewater treatment plants and sewers;
- A need to upgrade flood defences;
- 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;

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<sup>34</sup> Mid Suffolk District (2008) Core Strategy Development Plan Document [online] available at: <<https://www.midsuffolk.gov.uk/assets/CIL-and-S106-Documents/Pre-Adoption-Documents-Mid-Suffolk/Core-Strategy-with-CSFR-label-and-insert-sheet-07-01-13.pdf>> [last accessed 19/09/18]

<sup>35</sup> Department of Energy and Climate Change (2018) 2005 to 2016 UK local and regional CO2 emissions – data tables [online] available to download via: <<https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2016>> last accessed [19/09/18]

<sup>36</sup> The data was released on 18th June 2009: See: <<http://ukclimateprojections.metoffice.gov.uk/>> last accessed [19/09/18]

<sup>37</sup> UK Climate Projections (2014) East 2050s Medium Emissions Scenario [online] available at: <<http://ukclimateprojections.metoffice.gov.uk/23954?emission=medium>> last accessed [19/09/18]

- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads.

### Flood Risk

The areas at highest risk of flooding in the Neighbourhood Plan area are those near the River Rat which are in Flood Zone 3. The River Rat is a tributary of the River Gipping. Flood Zone 3 is of a high probability of flooding; representing that there is a 1% (1 in 100) or greater chance of flooding happening each year.

Surface water drainage and sewer flooding is a risk for some parts of the Neighbourhood Plan area, with sections of medium-high risk predominantly located around the River Rat and its tributaries. The 2008 SFRA also highlights that it is possible for Haughley to experience flooding from pluvial, sewer and groundwater sources.

### Summary of 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.

A Critical Drainage Area (CDA) is a discrete geographic area where multiple and interlinked sources of flood risk causes flooding in one or more Local Flood Risk Zones (LFRZ) during severe weather, impacting people, property and/or local infrastructure. Mid Suffolk District Council may wish to designate their own CDAs (in the absence of any designations from the Environment Agency)<sup>38</sup> within the Neighbourhood Plan area within the future, for reasons such as surface water capacity issues.

In terms of climate change contribution, per capita greenhouse gas emissions generated in the Neighbourhood Plan area may continue to decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies. However, increases in the built footprint of the Neighbourhood Plan area would contribute to increases in the absolute levels of greenhouse gas emissions.

## Landscape and Historic Environment

### Context Review

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

- *'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty [...]. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.'*
- Strategic policies should set out an overall strategy making provision for *'conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.'*
- Planning policies and decisions should ensure that developments *'are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).'*
- *'Planning policies and decisions should contribute to and enhance the natural and local environment by:*

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<sup>38</sup> GOV.UK (2017): 'Flood Risk Assessment in Flood Zone 1 and Critical Drainage Areas', [online] available to access via: <https://www.gov.uk/guidance/flood-risk-assessment-in-flood-zone-1-and-critical-drainage-areas> last accessed [20/09/18]

- a) *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils*
  - b) *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and*
  - c) *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.'*
- Strategic policies should set out an overall strategy making provision for *'conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.'*
  - Planning policies and decisions should ensure that developments *'are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).'*
  - 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.
  - Plans should set out a *'positive strategy'* for the *'conservation and enjoyment of the historic environment'*, including those heritage assets that are most at risk.
  - *'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss of less than substantial harm to its significance.'*

The policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and 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 England<sup>39</sup> 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.

Historic England is the statutory body that helps people care for, enjoy and celebrate England's spectacular historic environment. Guidance and advice notes provide essential information for local planning authorities, neighbourhood groups, developers, consultants, landowners and other interested parties on historic environment considerations, and are regularly reviewed and updated in light of legislative changes. The following guidance and advice notes are particularly relevant, and should be read in conjunction with the others.

- Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 (February 2016)<sup>40</sup> outlines ways to manage change that conserves and enhances historic areas in order to positively contribute to sustainable development. Principally, the advice note emphasises the importance of:

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<sup>39</sup> 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](http://webarchive.nationalarchives.gov.uk/+http://www.culture.gov.uk/reference_library/publications/6763.aspx) last accessed [20/0918]

<sup>40</sup> Historic England (2016): 'Conservation Area Designation, Appraisal and Management: Advice Note 1', [online] available to download via: <https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/> last accessed [11/12/18]

- Understanding the different types of special architectural and historic interest which underpin the designations; and
- Recognising the value of implementing controls through the appraisal and/or management plan which positively contribute to the significance and value of conservation areas.
- Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA): Historic England Advice Note 8 (December 2016)<sup>41</sup> provides support to all stakeholders involved in assessing the effects of certain plans and programmes on the historic environment. It offers advice on heritage considerations during each stage of the SA/SEA process, and helps to establish the basis for robust and comprehensive assessments.
- Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2<sup>nd</sup> Edition) (December 2017)<sup>42</sup> provides general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views can contribute to setting. Specifically, Part 2 of the advice note outlines a five stepped approach to conducting a broad assessment of setting:
  - Step 1: Identify which heritage assets and their settings are affected;
  - Step 2: Asses the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
  - Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
  - Step 4: Explore ways to maximise enhancement and avoid or minimise harm; and
  - Step 5: Make and document the decision and monitor outcomes.
- Neighbourhood Planning and the Historic Environment: Historic England Advice Note 11 (October 2018)<sup>43</sup> outlines the importance of considering the historic environment whilst preparing the plan (section 1), which culminates in a checklist of relevant of issues to consider, followed by an overview of what this means in terms of evidence gathering (section 2). Sections 3 to 5 of the advice note focus on how to translate evidence into policy, understand the SEA process and Historic England’s role in neighbourhood planning.

At the local level, a key objective of the Mid Suffolk Core Strategy<sup>44</sup> is to ‘protect, manage, enhance and restore the historic heritage / environment and the unique character and identity of the towns and villages by ensuring that new developments are appropriate in terms of scale and location in the context of settlement form and character’. The following policies in the Strategy also directly relate to the Landscape and Historic Environment SEA theme:

- Policy CS 2: Development in the Countryside and Countryside Villages
- Policy CS 5: Mid Suffolk’s Environment

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<sup>41</sup> Historic England (2016): ‘SA and SEA: Advice Note 8’ [online] available to download via:

<<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>> last accessed [11/12/18]

<sup>42</sup> Historic England (2017): ‘Setting of Heritage Assets: 2<sup>nd</sup> Edition’, [online] available to download via:

<<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>> last accessed [11/12/18]

<sup>43</sup> Historic England (2018): ‘Neighbourhood Planning and the Historic Environment’, [online] available to download via:

<<https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/>> last accessed [11/12/18]

<sup>44</sup> Mid Suffolk District (2008) Core Strategy Development Plan Document [online] available at: <

<https://www.midsuffolk.gov.uk/assets/CIL-and-S106-Documents/Pre-Adoption-Documents-Mid-Suffolk/Core-Strategy-with-CSFR-label-and-insert-sheet-07-01-13.pdf>> [last accessed 19/09/18]

## Summary of current baseline

### Landscape

The Neighbourhood Plan area is not located within or adjacent to a National Park or an Area of Outstanding Natural Beauty, and does not contain any Green Belt land.

#### *National Character Areas*

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. The Neighbourhood Plan area is located in two NCAs: the northern half of the Neighbourhood Plan area lies across South Norfolk and High Suffolk Claylands NCA and the southern half lies across South Suffolk and North Essex Clayland NCA. The following characteristics are particularly relevant for the Neighbourhood Plan area.

#### NCA Profile 83: South Norfolk and High Suffolk Claylands<sup>45</sup>

- Views are frequently open, only sometimes confined by hedges and trees, with some woodland present. The small valleys support quite confined landscapes with intimate views;
  - Scattered areas of ancient woodland, game copses, shelterbelts, valley floor plantation and carr woodland as well as hedgerow trees provide a treed landscape character, despite much boundary loss;
  - A mix of remnant medieval ancient countryside, some of it with a decidedly coaxial character, although irregular field patterns and large modern amalgamated open fields dominate;
  - Sinuous field boundaries are formed by deep ditches, some with hedgerows and hedgerow trees; and
  - A dispersed settlement pattern of small nucleated market towns with architectural variety and colour, loosely clustered villages and scattered hamlets. Settlement is often focused around large medieval greens. Many of the market towns have modern extensions.
- #### NCA Profile 86: South Suffolk and North Essex Clayland<sup>46</sup>
- An undulating chalky boulder clay plateau is dissected by numerous river valleys, giving a topography of gentle slopes in the lower, wider valleys and steeper slopes in the narrower upper parts;
  - The agricultural landscape is predominantly arable with a wooded appearance. There is some pasture on the valley floors. Field patterns are irregular despite rationalisation, with much ancient countryside surviving. Field margins support corn bunting, cornflower and brown hare;
  - There is a dispersed settlement pattern of scattered farmsteads, parishes and small settlements around 'tyes' (commons) or strip greens and isolated hamlets. The NCA features a concentration of isolated moated farmsteads and numerous well-preserved medieval towns and large villages;
  - Winding, narrow and sometimes sunken lanes are bounded by deep ditches, wide verges and strong hedgerows. Transport infrastructure includes the A14, A12, M11 and Stansted Airport; and
  - A strong network of public rights of way provides access to the area's archetypal lowland English countryside.

At the local level, Landscape Guidance (2015) was provided by Babergh and Mid Suffolk District Council<sup>47</sup> which described Haughley's landscape to be comprised of ancient plateau claylands consisting of gently rolling arable landscape of clay soils with scattered ancient woodland.

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<sup>45</sup> Natural England (2014): 'NCA Profile 83: South Norfolk and High Suffolk Claylands (NE544)', [online] available to download via: <<http://publications.naturalengland.org.uk/publication/6106120561098752>> last accessed [20/09/18]

<sup>46</sup> Natural England (2014): 'NCA Profile: 86 South Suffolk and North Essex Clayland (NE515)' [online] available to download via: <<http://publications.naturalengland.org.uk/publication/5095677797335040?category=587130>> last accessed [20/09/18]

Suffolk County Council carried out a Landscape Character Assessment in 2008 and was updated in 2011<sup>48</sup>. Four landscape types cover Haughley: ancient plateau claylands, plateau claylands, rolling valley farmlands & furze, and wooded valley meadows.

Key characteristics of ancient plateau claylands are:

- Flat or gently rolling arable landscape of clay soils dissected by small river valleys;
- Field pattern of ancient enclosure – random patterns in the south but often co-axial in the north. Small patches of straight-edged fields associated with the late enclosure of woods and greens;
- Dispersed settlement pattern of loosely clustered villages, hamlets and isolated farmsteads of medieval origin; and
- Scattered ancient woodland parcels containing a mix of oak, lime, cherry, hazel, hornbeam, ash and holly.

Key characteristics of ancient plateau claylands are:

- Plateaux of heavy clay soil very gently undulating or flat dissected by small streams;
- Ancient organic pattern of fields, some co-axial in the north-east;
- Substantial hedges of hawthorn blackthorn and elm with oak and ash predominant hedgerow trees; and
- Dispersed settlement, villages with multiple nuclei, landscape scattered with farmsteads and hamlets.

Key characteristics of rolling valley farmlands & furze are:

- Valleys with prominent river terraces of sandy soil;
- Small areas of gorse heathland in a clayland setting; and
- Mixed hedgerows of hawthorn, dogwood and blackthorn with oak, ash and field maple.

Key characteristics of wooded valley meadows are:

- Flat narrow valley floors;
- Wet clay and peat soils;
- Small meadows bounded by ditches or hedges; and
- Carr woodland and scrub.

## Historic Environment

Scheduled monuments are sites of national importance and protected by the Ancient Monuments and Archaeological Areas Act 1979. According to the National Heritage List for England<sup>49</sup>, there is one scheduled monument (Haughley Castle) located towards the centre of the Neighbourhood Plan area.

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. The Neighbourhood Plan area contains two Grade I, one Grade II\* and Grade 65 Grade II listed buildings. The Grade I listed buildings are 'Haughley Park and Attached Garden Walls on Three Sides' towards the south west of the Neighbourhood Plan Area and 'Church of St Mary the Virgin' towards the centre of the Neighbourhood

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<sup>47</sup> Babergh and Mid Suffolk District Council (2015): 'Landscape Guidance' [online] available at: <<https://www.babergh.gov.uk/assets/DM-Planning-Uploads/Joint-Landscape-Guidance-Aug-2015.pdf>> last accessed [20/09/18]

<sup>48</sup> Suffolk County Council (2018) Suffolk Landscape Character Assessment [online] available at <http://www.suffolklandscape.org.uk/> [last accessed 20/09/18]

<sup>49</sup> Historic England: National Heritage List for England: <<http://list.historicengland.org.uk>> last accessed [20/09/2018]



Plan area. Grade II\* building is 'New Bells Farmhouse' located towards the north of the Neighbourhood Plan area.

Conservation Areas are designated because of their special architectural and historic interest<sup>50</sup>. 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<sup>51</sup>. Ideally, appraisals should be regularly reviewed as part of the management of the Conservation Area, and can be developed into a management plan.

A Conservation Area appraisal was undertaken for Haughley in 2008. There is a Conservation Area present in Haughley which surrounds Haugley village centre and includes Old Street, The Green, Duke Street, Bacton Road and The Folly. The location of the Conservation Area is shown on Figure 5.1. The Conservation Area was originally designated by East Suffolk County Council in 1972 and inherited by Mid Suffolk District Council at its inception in 1974. 32 of the listed buildings are located within the Conservation Area. The majority of these buildings are of houses and farms of a domestic scale, mainly timber-framed and rendered. Also within the Conservation Area are sites of archaeological interest which include ring ditches, the Parish churchyard and two moated sites. The Norman Motte and Bailey of Haughley Castle with its moat at the north-west end of the village are also present in the Conservation Area.

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I and Grade II\* listed buildings, scheduled monuments, historic parks and gardens, registered battlefields, wreck sites and Conservation Areas deemed to be 'at risk'. The register does not include Grade II listed buildings. Published in November 2018, the latest Heritage at Risk Register for East England<sup>52</sup> shows that 14 historic features in the entirety of the Mid Suffolk District are at risk, none of which are within the boundaries of the Neighbourhood Plan area.

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. For example, open spaces and key distinctive buildings in the area are likely to be of value for local people. Additionally, the Historic Environment Record for Suffolk<sup>53</sup> contains 58 listings within the parish of Haughley, including buildings, ringed ditches, Neolithic and medieval artefacts, and archaeological finds.

### Summary of 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.

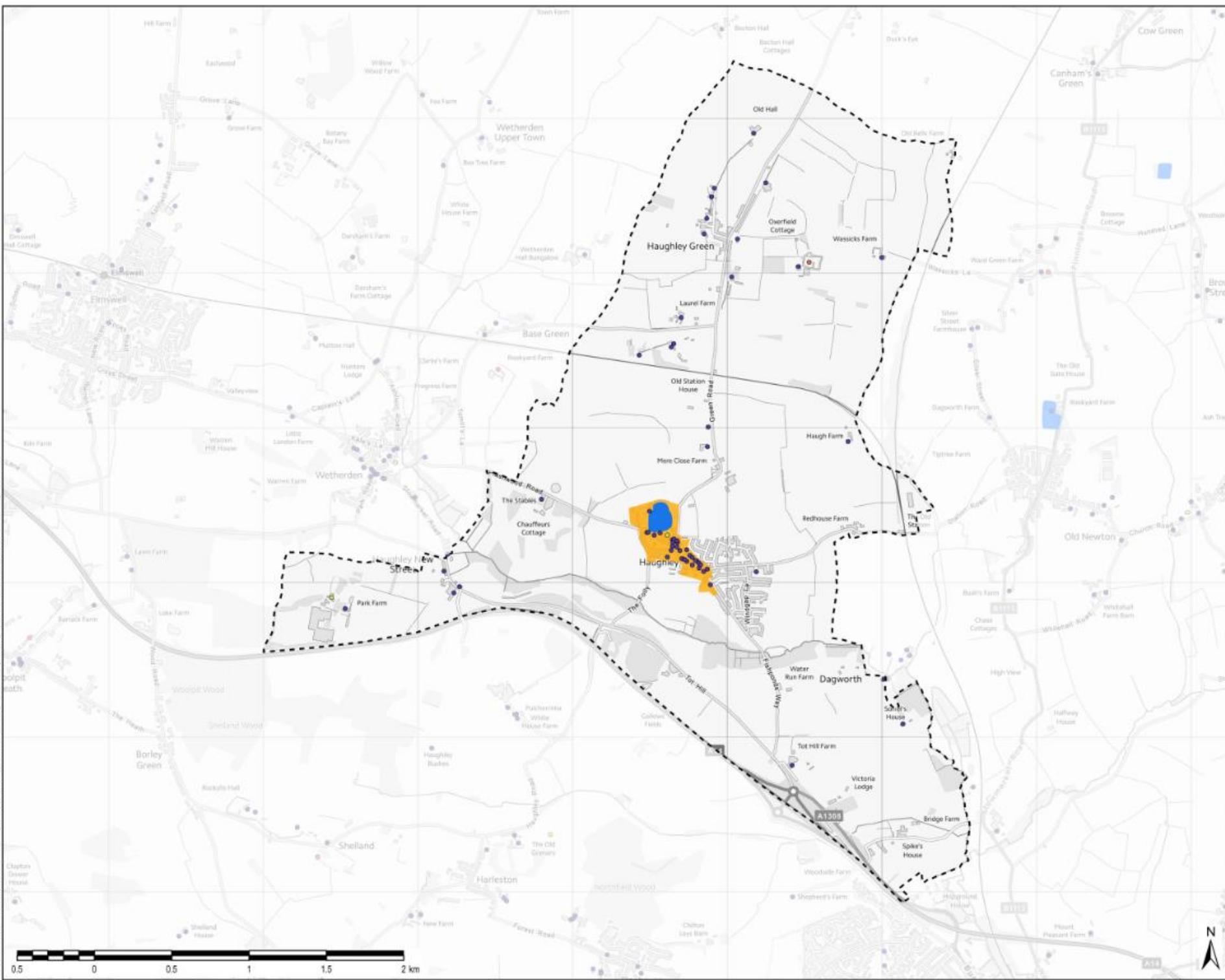
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<sup>50</sup> Historic England (2017): 'Conservation Areas', [online] available to download via: <<https://historicengland.org.uk/listing/what-is-designation/local/conservation-areas/>> last accessed [20/09/18]

<sup>51</sup> 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 [20/09/18]

<sup>52</sup> Historic England (2018): 'Heritage at Risk Register: East of England', [online] available to download via: <<https://historicengland.org.uk/images-books/publications/har-2018-registers/>> last accessed [11/12/18]

<sup>53</sup> Heritage Gateway (2018): 'Suffolk Historic Environment Record', [online] available to access via: <<http://www.heritagegateway.org.uk/Gateway/Results.aspx>> last accessed [11/12/18]



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

**LEGEND**

- Haughley Parish Neighbourhood Plan Area
- Listed building**

  - Grade I
  - Grade II\*
  - Grade II

- Record of Scheduled Monument
- Conservation Area

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Purpose of Issue **DRAFT**

Client  
**HAUGHLEY PARISH NEIGHBOURHOOD PLAN WORKING PARTY**

Project Title  
**SEA FOR THE HAUGHLEY PARISH NEIGHBOURHOOD PLAN**

Drawing Title  
**HISTORIC ENVIRONMENT AND LANDSCAPE DESIGNATIONS**

Drawn	Checked	Approved	Date
CN	MW	NCB	20/12/2018
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AECOM  
 8000 Lakeside  
 Harrogate, HG2 9JF  
 Telephone: 01834 313300  
 Fax: 01834 313301  
 www.aecom.com



## Land, Soil and Water Resources

### Context Review

The EU's Soil Thematic Strategy<sup>54</sup> presents a strategy for protecting soil 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.

Adopted in October 2000, the purpose of the EU Water Framework Directive (WFD) is to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater, driving 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;
- Ensure the progressive reduction of groundwater pollution; and
- Contribute to achieving 'good' water quality status for as many waterbodies as possible by 2027.

Key messages from the NPPF include:

- *'Planning policies and decisions should contribute to and enhance the natural and local environment by:*
  - a) *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; and*
  - b) *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'*
- 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'.
- *'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.'*
- *'Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.'*
- Planning policies and decisions should *'give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs', and 'promote and support the development of under-utilised land and buildings.'*
- Taking a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.
- Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.

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<sup>54</sup> European Commission (2006) Soil Thematic Policy [online] available at: <[http://ec.europa.eu/environment/soil/index\\_en.htm](http://ec.europa.eu/environment/soil/index_en.htm)> last accessed [29/06/18]

- The government has produced a separate plan that specifically deals with planning policy in relation to waste management; this should be read in conjunction with the NPPF.

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 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 England<sup>55</sup>, which sets out a vision for soil use in England, and the Water White Paper<sup>56</sup>, 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 England<sup>57</sup> recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.

At the local level, a key objective of the Mid Suffolk Core Strategy<sup>58</sup> is to 'seek to improve water quality and reduce pollution to the wider environment'. Policy CS 4: Adapting to Climate Change in the Strategy also directly relates to the Land, Soil and Water Resources SEA theme.

## Summary of 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 terms of the location of the best and most versatile agricultural land, a recent detailed classification has not been undertaken for the whole of the Neighbourhood Plan area.

Therefore there is a need to rely on the Pre-1988 Agricultural Land Classification to provide an indication of the land classification for Haughley. The Pre-1988 classification identifies that the Neighbourhood Plan area is predominantly covered by Grade 3 agricultural land, but there are patches of Grade 2 agricultural land present near Haughley village centre<sup>59</sup>. It is unknown at this stage if the Grade 3 land present is grade 3a or 3b. In this context the Grade 2 land in the Neighbourhood Plan area comprises land classified as the best and most versatile, with other areas within the Neighbourhood Plan area potentially being classified as such.

### *Watercourses*

The main watercourse flowing through the Neighbourhood Plan area is the River Rat which is a major tributary of the River Gipping. The River Rat begins to the south of Felsham village and flows through Haughley and joins the River Gipping in Stowmarket.

Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. The zones show the risk of contamination from activities that might cause groundwater pollution in the area. Within the Neighbourhood Plan Area there is a SPZ1 located

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<sup>55</sup> 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 [20/09/18]

<sup>56</sup> 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 [20/09/18]

<sup>57</sup> 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 [20/09/18]

<sup>58</sup> Mid Suffolk District (2008) Core Strategy Development Plan Document [online] available at: <<https://www.midsuffolk.gov.uk/assets/CIL-and-S106-Documents/Pre-Adoption-Documents-Mid-Suffolk/Core-Strategy-with-CSFR-label-and-insert-sheet-07-01-13.pdf>> [last accessed 20/09/18]

<sup>59</sup> Magic Map (2018) available at <https://magic.defra.gov.uk/MagicMap.aspx> [last accessed 20/09/18].

near Haughley Park in the South West of the boundary. SPZ1 is categorised as the inner zone of an SPZ and is the most vulnerable to contamination and most likely to influence the use of infiltration. Adjacent to this SPZ1 area are areas of SPZ2 and SPZ3 (outer zones). The rest of the Neighbourhood Plan area falls within SPZ3, with a smaller section around the SPZ1 area falling within SPZ2. <sup>41</sup>

### Summary of future baseline

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

In terms of water quality, the requirements of the Water Framework Directive (and its replacement) are likely to lead to continued improvements to water quality in watercourses in the wider area. 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 water bodies.

## Population and Community

### Context Review

Key messages from the NPPF include:

- One of the three overarching objectives of the NPPF is a social objective to; *'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.'*
- To support the Government's objective of significantly boosting the supply of housing, strategic policies *'should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'*
- The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site where possible.
- Recognise the important contribution of small and medium sized development sites in meeting housing needs. Local Plans should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, and neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites.
- In rural areas, planning policies and decisions 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.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, open space, 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' and taking a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.*

The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change<sup>60</sup> 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.

At the local level, key objectives of the Mid Suffolk Core Strategy<sup>61</sup> are to 'support sustainable communities by locating development where it will enable people to access jobs and key services, such as education, health, recreation and other facilities recognising and respecting the diversity in the function and character of Mid Suffolk's towns, key service centres and primary and secondary villages and countryside' and to 'prepare for an ageing population, including the provision and retention of community facilities and suitable housing, including sheltered and assisted accommodation'. Policy CS 2: Development in the Countryside and Countryside Villages and Policy CS 9: Density and Mix from the Strategy also directly relates to the Population and Community SEA theme.

## Summary of current baseline

### Population

The population of Haughley<sup>62</sup> declined between 2001 and 2011. This is in contrast to Mid Suffolk, the East of England and England where the population has increased between 2001 and 2011.

### Age structure

There are a larger proportion of residents within the 60+ age category within the Neighbourhood Plan area (32.6%) in comparison to the totals for Mid Suffolk (27.9%), the East of England (23.9%) and England (22.3%)<sup>63</sup>. In contrast, a lower proportion of residents are within the working age categories (25-44 and 45-59) in the Neighbourhood Plan area (40.5%) in comparison to the totals for Mid Suffolk (44.5%), the East of England (46.2%) and England (46.9%). Additionally, 26.9% of residents within the Neighbourhood Plan area are within the younger age categories (0-15 and 16-24), slightly less than the proportions for Mid Suffolk (27.6%), the East of England (29.9%) and England (30.8%).

### Household Deprivation

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

- a) **Employment:** Any person in the household (not a full-time student) that is either unemployed or long-term sick.
- b) **Education:** No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
- c) **Health and Disability:** Any person in the household that has generally 'bad' or 'very bad' health, or has a long term health problem.
- d) **Housing:** The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.

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<sup>60</sup> 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 [21/09/18]

<sup>61</sup> Mid Suffolk District (2008) Core Strategy Development Plan Document [online] available at: <<https://www.midsuffolk.gov.uk/assets/CIL-and-S106-Documents/Pre-Adoption-Documents-Mid-Suffolk/Core-Strategy-with-CSFR-label-and-insert-sheet-07-01-13.pdf>> [last accessed 20/09/18]

<sup>62</sup> ONS (no date): Census 2011: Population Density 2011 (Table QS102EW); Population Density 2001 (Table UV02)

<sup>63</sup> ONS (no date): Census 2011: Age Structure 2011 (Table KS102EW)

Based on 2011 Census data<sup>64</sup>, a higher proportion of households are deprived in 1 or more dimensions within the Neighbourhood Plan area (61.6%) in comparison to Mid Suffolk (51.3%), the East of England (52.2%) and England (57.4%). Out of the 43.8% of households which are deprived in the Neighbourhood Plan area, the majority are deprived in one or two dimensions, which is similar to the regional and national averages.

### *Index of Multiple Deprivation*

The Index of Multiple Deprivation 2015 (IMD) 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:

- a) **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).
- b) **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.
- c) **Education, Skills and Training:** The lack of attainment and skills in the local population.
- d) **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.
- e) **Crime:** The risk of personal and material victimisation at local level.
- f) **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
  1. 'Geographical Barriers': relating to the physical proximity of local services
  2. 'Wider Barriers': relating to access to housing, such as affordability.
- g) **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
  3. 'Indoors Living Environment' measures the quality of housing.
  4. 'Outdoors Living Environment' measures air quality and road traffic accidents.

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

- a) **Income Deprivation Affecting Children Index:** The proportion of all children aged 0 to 15 living in income deprived families.
- b) **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, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2015, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales. The Neighbourhood Plan area falls within LSOA: Mid Suffolk 006B and is within the 50% least deprived LSOAs in England.

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<sup>64</sup> ONS (no date): Census 2011: 'Households by Deprivation Dimensions 2011 (Table QS119EW)

## Housing tenure

Within the Neighbourhood Plan area, 64.6% of residents either own their home outright or with a mortgage, lower than the totals for Mid Suffolk (75.1%) and the East of England (67.7%), but broadly aligning with the total for England (63.3%)<sup>65</sup>. There are a lower proportion of residents living within privately rented accommodation in the Neighbourhood Plan area in comparison to the regional and national trends. Additionally, there are a higher proportion of residents living in social rented accommodation in comparison to Mid Suffolk, East of England and England. The percentage of residents in the Neighbourhood Plan area living in shared ownership accommodation (5.9%) is higher than the totals for Mid Suffolk (0.9%) the East of England (0.7%) and England (0.8%).

## Education

Based on the 2011 census data<sup>66</sup>, 26.3% of residents in the Neighbourhood Plan area have no qualifications, slightly higher than the total for Mid Suffolk (22.3%), the East (22.5%) and England (20.7%). 24.6% of residents within the Neighbourhood Plan area have a Level 4 qualification or above, which is lower than the totals for Mid Suffolk (26.4%) the East of England (5.4%) and England (5.7%).

## Employment

In regards to employment within the Neighbourhood Plan area, the following three occupation categories support the most residents<sup>67</sup>:

- Professional occupations (15.3%);
- Managers, directors, senior officials (15.3%); and
- Skilled trade occupations (13.6%).

Overall, 43.2% of residents within the Neighbourhood Plan area are employed in one of the above three occupation categories, compared with 42.2% for Mid Suffolk, 40.0% in the East of England and 39.7% in England. However, the Neighbourhood Plan area has less 'Associate professional & technical' occupations (11.4%) than Mid Suffolk (13.2%), the East of England (12.9%) and England (12.8%). All other occupation categories are broadly similar to the regional and national trends.

## Summary of future baseline

There are more residents within the 60+ age category within the Neighbourhood Plan area (32.6%) in comparison to the totals for Mid Suffolk (27.9%), the East of England (23.9%) and England (22.3%). As the population continues to age, this has the potential to place pressures on the existing services and facilities within the timeframe of the Neighbourhood Plan. This could negatively impact on the future vitality of the local community and economy.

# Health and Wellbeing

## Context Review

Key messages from the NPPF include:

- One of the three overarching objectives of the NPPF is a social objective to; *'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.'*
- *'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health*

<sup>65</sup> ONS (no date): Census 2011: Tenure-Households 2011 (Table QS405EW)

<sup>66</sup> ONS (no date): Census 2011: Highest Level of Qualification 2011 (Table QS501EW)

<sup>67</sup> ONS (no date): Census 2011: 'Occupation 2011' (Table KS608EW)



*and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.'*

- Policies and decisions should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
- Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. Development should avoid building on existing open space, sports and recreational buildings and land, including playing fields.
- 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.

In relation to other key national messages in relation to health, Fair Society, Healthy Lives<sup>68</sup> ('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 local level, a key objective of the Mid Suffolk Core Strategy<sup>69</sup> is to 'provide appropriate healthcare for an ageing population; secure independence at home; promote healthy living; deal with the causes and effects of social exclusion; and decrease the number of accidents in the community.'

## Summary of 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. Based on 2011 Census data<sup>70</sup>, 78.3% of residents in the Neighbourhood Plan area consider themselves as having 'very good health' or 'good health', less than the totals for Mid Suffolk (83.2%), the East of England (82.5%) and England (81.4%). Similarly, the percentage of residents in the Neighbourhood Plan area considering themselves to have 'bad health' or 'very bad health' is 5.3%, higher than the total for Mid Suffolk (4.0%), the East of England (4.7%) and England (5.4%).

The total percentage of residents within the Neighbourhood Plan area who report that their activities are limited 'a little' is higher than the regional and national totals<sup>71</sup>. There are also a slightly higher number of residents within the Neighbourhood Plan area who report that their activities are limited 'a lot' (7.6%) in comparison to Mid Suffolk (6.7%), the East of England (7.4%) and England (8.3%). Overall, 79.0 % of residents in the Neighbourhood Plan area report that their activities are 'not limited', lower than the totals for Mid Suffolk (83.5%), the East of England (83.3%) and England (82.4%).

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<sup>68</sup> The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available to download from: <  
<https://www.nice.org.uk/media/default/About/what-we-do/NICE-guidance/NICE-guidelines/Public-health-guidelines/Additional-publications/Spatial-planning/the-marmot-review-implications-for-spatial-planning.pdf> > last accessed [24/09/18]

<sup>69</sup> Mid Suffolk District (2008) Core Strategy Development Plan Document [online] available at: <  
<https://www.midsuffolk.gov.uk/assets/CIL-and-S106-Documents/Pre-Adoption-Documents-Mid-Suffolk/Core-Strategy-with-CSFR-label-and-insert-sheet-07-01-13.pdf> > [last accessed 20/09/18]

<sup>70</sup> ONS (no date): Census 2011: 'General Health 2011' (Table QS302EW)

<sup>71</sup> ONS (no date): Census 2011: 'Long-term Health Problem or Disability 2011' (Table QS303EW)



## Summary of future baseline

Health and wellbeing levels within the Neighbourhood Plan area are generally lower than regional and national averages with a lower percentage of residents reporting 'good' or 'very good' health, and a higher percentage of residents reporting that their activities are limited in some way.

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

### Context Review

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.

Key messages from the NPPF include:

- *'Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*
  - *a) The potential impacts of development on transport networks can be addressed*
  - *b) Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised*
  - *c) Opportunities to promote walking, cycling and public transport use are identified and pursued*
  - *d) The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account*
  - *e) Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.'*
- *'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.'*

At the local level, each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan (LTP) through the Local Transport Act 2000, as amended by the Local Transport Act 2008. Implemented by Suffolk County Council, the 'Suffolk LTP 2011-2031'<sup>72</sup> aims to support business and growth with a focus on:

- The challenge of maintaining the highway network in good condition;
- Tackling congestion in the larger towns by more efficient management of traffic, reducing the demand for car travel and promoting more sustainable means of travel;
- Improved connectivity and accessibility in rural areas;

<sup>72</sup> Suffolk County Council (2011): 'Suffolk LTP 2011-2031: Part 1 - Transport Strategy [online] available to access via: <[https://www.ipswich.gov.uk/sites/default/files/scd14\\_combined.pdf](https://www.ipswich.gov.uk/sites/default/files/scd14_combined.pdf)> last accessed [24/09/18]

- Seeking improvement to the A11, A12 and A14 trunk roads connecting businesses in Suffolk to each other and to their markets;
- Seeking improvement to the rail network for freight and passengers;
- Relief for our market towns suffering from high levels of through traffic; and
- Recognising that securing high speed broadband throughout Suffolk is very important at present in addressing accessibility and connectivity issues throughout Suffolk and supporting business growth.

At the local level, a key objective of the Mid Suffolk Core Strategy<sup>73</sup> is to 'support and enable public and community transport services and encourage walking and cycling initiatives to provide access to jobs, shops and services and consider new methods of delivering and protecting existing services for smaller communities'. Policy CS 6: Services and Infrastructure also directly relates to the Transportation SEA theme.

## Summary of current baseline

### *Rail Network*

There are no railway stations within the Neighbourhood Plan area. The nearest stations to the Neighbourhood Plan area are Stowmarket which is approximately 1.5 km away from the Neighbourhood Plan area and Elmswell which is approximately 2.1 km away. Stowmarket railway station is on the Great Eastern Main Line which connects directly to London Liverpool Street. Elmswell railway station provides direct links to Cambridge and Ipswich.

### *Bus Network*

In regards to the bus network<sup>74</sup>, there are four local bus services in operation from the Neighbourhood Plan area providing low frequency services, as outlined below:

- Route 384: Stowmarket – Haughley – Wetherden – Elmswell – Woolpit – Tostock – Beyton – Thurston – East Barton – Cattishall – Bury St Edmunds ; Frequency: 3 journeys on Monday to Saturday Operating: Monday to Saturday.
- Route 385: Stowmarket – Haughley – Wetherden – Elmswell – Woolpit – Tostock – Beyton – Thurston – East Barton – Cattishall – Bury St Edmunds; Frequency: only runs once a day on Monday to Saturday; Operating: Monday to Saturday.
- Route 929: Bury St Edmunds – Rougham – Beyton – Elmswell – Wetherden – Haughley – Stowmarket – Badley – Needham Market – Darmsden – Barham – Gibraltar – Otley (College); Frequency: only runs once a day for the school service: Monday to Friday.
- Route 988: Thurston (Community College) – Beyton – Woolpit – Elmswell – Wetherden – Haughley – Stowmarket Frequency: only runs once a day for the school service: Monday to Friday.

### *Road Network and Congestion*

The Neighbourhood Plan area is well connected to the national road network. Key routes are as follows:

- The A14 marks the southern boundary of the Neighbourhood Plan area. This major trunk road links the M1 near Coventry to Kettering, Cambridge, Ipswich and Felixstowe port. West of Haughley is Bury St Edmunds, where the A14 meets the A131 and provides links to Braintree and Chelmsford. The A14 also joins the M11 (via the A11) near Cambridge which links to northeast London.

<sup>73</sup> Mid Suffolk District (2008) Core Strategy Development Plan Document [online] available at: <<https://www.midsuffolk.gov.uk/assets/CIL-and-S106-Documents/Pre-Adoption-Documents-Mid-Suffolk/Core-Strategy-with-CSFR-label-and-insert-sheet-07-01-13.pdf>> [last accessed 24/09/18]

<sup>74</sup> Travel Search (2018): 'Listing of Bus Services from Hau011', [online] available to access via: <<http://www.carlberry.co.uk/rfnlstr.asp?size=F&L1=HAU0110&op=B>> last accessed [24/09/18]

- A network of country roads are present in the Neighbourhood Plan area, including Bacton Road which links north to Bacton and Station Road which links east to Old Newton.

### *Cycle and Footpath Network*

There are networks of footpaths which pass through the Neighbourhood Plan area.<sup>75</sup> However, there are no official National Cycle Routes within the Neighbourhood Plan area.

### *Availability of Cars and Vans*

Based on the 2011 census data<sup>76</sup>, 81.5% of households in the Neighbourhood Plan area have access to at least one car or van, which is the same as the percentage of the East of England (81.5%), less than the percentages for Mid Suffolk (88.7%) and greater than the percentage for England (74.0%).

### *Travel to work*

The most popular method of travelling to work in the Neighbourhood Plan area is via driving a car or van (48.4%), which is similar to the totals for Mid Suffolk (48.5%), but greater than the total for the East of England (41.4%) and England (37%)<sup>77</sup>. A lower percentage of residents in the Neighbourhood Plan catch a train, bus, minibus or coach to work in comparison to the regional and national trends. In contrast, a higher proportion of residents work mainly at or from home.

### **Summary of future baseline**

New development has the potential to increase traffic and lead to additional congestion issues within the Neighbourhood Plan area, particularly at existing congestion hotspots. Whilst negative effects of new development on the transport network may be mitigated in part by the latest LTP, there will be a continuing need for development to be situated in accessible locations.

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.

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<sup>75</sup> Ordnance Survey (2018) 'OS routes near Haughley, Mid Suffolk', [online] available to access via <  
<https://getoutside.ordnancesurvey.co.uk/local/haughley-mid-suffolk>> last accessed [24/09/2018]

<sup>76</sup> ONS (no date): 'Car or Van Availability 2011', (Table QS416EW)

<sup>77</sup> ONS (no date): Census 2011: 'Method of Travel to Work 2011' (Table QS701EW)

