

Strategic Environmental Assessment (SEA) for the Redgrave Neighbourhood Plan

Environmental Report

Redgrave Parish Council

April 2021

Quality information

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Non-Technical Summary (NTS)

Introduction

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Redgrave Neighbourhood Plan (RNP).

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the RNP is a legal requirement.¹

The RNP is being prepared by the Parish Council in the context of the adopted Mid Suffolk Core Strategy (2008) and its Focused Review (2012) and saved policies of the 1998 Local Plan, as well as the emerging Babergh and Mid Suffolk Joint Local Plan.

Once 'made' the RNP will have material weight when deciding on planning applications in the Plan area, alongside the Mid Suffolk Local Development Framework.

The Neighbourhood Plan is at an advanced stage of preparation, with the SEA Environmental Report, including this NTS, accompanying the Submission version of the Neighbourhood Plan.

Structure of the Environmental Report/ this NTS

SEA reporting essentially involves answering the following questions in turn:

1) What has plan-making / SEA involved **up to this point?**

- including in relation to 'reasonable alternatives'.

2) What are the SEA findings **at this stage?**

- i.e. in relation to the draft plan.

3) What happens **next?**

Each of these questions is answered in turn within a discrete 'part' of the Environmental Report and summarised within this NTS. However, firstly there is a need to set the scene further by answering the questions 'What is the Plan seeking to achieve?' and 'What's the scope of the SEA?'

What is the Plan seeking to achieve?

The RNP has a clear vision that *"By 2036 Redgrave will continue to be a small, beautiful village that has developed sustainably. It will develop in proportion to its rural character; rich in green spaces surrounded by a diverse rural environment with a better balance of housing to meet the needs of its residents"*.

¹ Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations ('the SEA Regulations'). The RNP was subject to formal screening in 2020.

To achieve this vision, seven community objectives have been identified across three themes:

Community

1. To provide for housing that meets the needs of the local population and achieve a better balance of available housing.
2. To improve the community infrastructure of Redgrave, in order to provide more places for people, young and old to undertake their work, leisure and community pursuits and to support the health and wellbeing of residents.

Natural & Historic Environment

3. To protect and enhance Redgrave's natural and historic assets.
4. To protect and maintain Redgrave's rural village identity and ensure that new development respects its form and character.
5. To encourage low carbon initiatives and future sustainability.

Business & Infrastructure

6. To protect the existing business base of the village and ensure that the relationship between business and residents remains in harmony.
7. To seek to improve the physical infrastructure that serves the residents and businesses of Redgrave.

What is the scope of the SEA?

The scope of the SEA is reflected in a list of themes, objectives, and assessment questions, which, taken together indicate the parameters of the SEA and provide a methodological 'framework' for assessment. A summary framework is presented below, and a full framework which includes assessment questions is provided within the main Environmental Report (see **Table 3.1**).

SEA theme	SEA objective
Biodiversity	Protect and enhance biodiversity and geodiversity sites and features where possible.
Climate change	Reduce the contribution to climate change made by activities within the Neighbourhood Plan area Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape and villagescape
Historic environment	Protect, conserve and enhance the historic environment within and surrounding the Neighbourhood Plan area
Land, soil and water resources	Ensure the efficient and effective use of land. Protect and enhance water quality and use and manage water resources in a sustainable manner.
Population and communities	Ensure growth in the Parish is aligned with the needs of all residents and capacity of the settlement and social infrastructure, improving accessibility,

SEA theme	SEA objective
	anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.
Health and wellbeing	Improve the health and wellbeing of residents within the Neighbourhood Plan Area.
Transportation	Promote sustainable transport use and reduce the need to travel.

Plan-making/ SEA up to this point

An important element of the required SEA process involves assessing 'reasonable alternatives' in time to inform development of the draft proposals, and then publishing information on reasonable alternatives for consultation alongside the draft proposals.

As such, Part 1 of the Environmental Report explains how work was undertaken to develop and assess a 'reasonable' range of alternative approaches to the allocation of land for housing, or alternative sites.

Specifically, Part 1 of the report -

- 1) explains the process of establishing the reasonable alternatives;
- 2) presents the outcomes of assessing the reasonable alternatives; and
- 3) explains reasons for establishing the preferred option, in light of the assessment.

The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing, given the following considerations:

- RNP objectives, particularly the core objective to understand housing needs and allocate sites for development;
- Housing growth is known to be a matter of key interest amongst residents and other stakeholders; and
- The delivery of new homes is most likely to have a significant effect compared to the other proposals within the Plan. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

Establishing the reasonable alternatives

The Environmental Report (**Chapter 5**) explains how reasonable alternatives were established subsequent to process of considering the strategic policy context ('top down' factors) and the site options in contention for allocation ('bottom-up' factors).

This work identifies four site options with the potential to deliver growth within Redgrave. These options are:

- **Option 1:** Site 2 - Godfathers Meadows, the Green for up to 2 homes
- **Option 2:** Site 4 - Land at Half Moon Lane for up to 14 homes
- **Option 3:** Site 5 - Land adjacent to Jade House, The Street for up to 3 homes
- **Option 4:** Reduced area at Churchway site for up to 8 dwellings

Assessing the reasonable alternatives

The summary findings for the assessment of the four options is presented below, with detailed findings presented in **Chapter 6** of the Environmental Report.

SEA theme		Option 1 (Godfathers Meadows)	Option 2 (Land at Half Moon Lane)	Option 3 (Land adj. Jade House)	Option 4 (reduced area at Churchway)
Biodiversity	Likely effect	Neutral	Neutral	Neutral	Neutral
	Rank	2	4	3	1
Climate change	Likely effect	Neutral	Neutral	Neutral	Neutral
	Rank	=	=	=	=
Landscape	Likely effect	Minor negative	Significant negative	Minor negative	Minor negative
	Rank	2	4	3	1
Historic environment	Likely effect	Minor negative	Significant negative	Minor negative	Minor negative
	Rank	1	2	1	1
Land, soil and water resources	Likely effect	Minor negative	Minor negative	Minor negative	Minor negative
	Rank	=	=	=	=
Population and communities	Likely effect	Minor positive	Minor positive	Minor positive	Minor positive
	Rank	3	1	3	2
Health and wellbeing	Likely effect	Neutral	Neutral	Neutral	Neutral
	Rank	2	2	2	1
Transportation	Likely effect	Minor negative	Minor negative	Minor negative	Minor negative
	Rank	2	4	3	1

Overall, Option 2 is notable for potential negative effects of significance in relation to both landscape and the historic environment. This is due to its location within a proposed 'Area of Local Landscape Sensitivity' and the potential for interactions and therefore cumulative negative effects with permitted development on the Redgrave Conservation Area. The site also lies adjacent to an extensive area of woodland Priority Habitat. However, by proposing a greater number of homes, the site does have potential to make a greater contribution to the delivery of affordable homes as well as smaller homes to meet local needs, to the benefit of the local community.

Compared to Option 2, Option 4 performs notably better in relation to biodiversity, landscape, historic environment and health and wellbeing. This is particularly by virtue of its location adjacent to proposed open space, providing direct recreational access and mitigating such pressures on designated biodiversity sites to some degree. However, this is on the assumption that suitable compensation/ mitigation will be provided for the partial loss of land proposed as open space.

Broadly neutral effects are considered likely for all options overall in relation to biodiversity, climate change and health and wellbeing, with no significant variations from the baseline anticipated.

Given the loss of greenfield and agricultural land under all proposals, minor long-term negative effects are anticipated in relation to the landscape and land, soil and water resource SEA themes. Given any new residents are also likely to continue trends which favour the private vehicle in journeys beyond the settlement confines, minor long-term negative effects are also anticipated in relation to the transportation theme.

Finally, Options 1, 3 and 4 would also need to consider their location within the setting of the Redgrave Conservation Area, in particular in changing views into and out of the designated area.

Developing the preferred approach

The Parish Council have provided detailed reasons for the progression or rejection of options which are presented in Chapter 7 of the main Environmental Report.

Assessment findings at this stage

Part 2 of the Environmental Report presents an assessment of the Submission version of the Redgrave Neighbourhood Plan. Assessment findings are presented as a series of narratives under the 'SEA framework' topic headings. The following conclusions are reached:

- Overall, the assessment has determined that the current version of the RNP is likely to lead to predominately positive effects. **Significant long-term positive effects** are anticipated in relation to population and communities and health and wellbeing through supporting sustainable growth of the community and healthy lifestyles. The RNP seeks to deliver housing to meet local needs; and ensures the type of housing being developed is likely to support the needs of all sectors of the local community. Further to this the RNP supports the vitality and viability of the village through the protection and enhancement of the high-quality public realm and valued green spaces, a net gain in community infrastructure that meets Redgrave's needs, and support for sustainable local economic growth.
- **Minor positive effects** are predicted for biodiversity and climate change given the Neighbourhood Plan policy framework sets out a number of requirements which support local and national climate change objectives/ targets. Notably the premise for biodiversity protection, enhancement, and net gain embedded through the Neighbourhood Plan policy framework will lead to positive effects directly and indirectly for biodiversity and climate change respectively. Minor positive effects are however 'uncertain' at this stage in relation to biodiversity and will be dependent on the specific details of proposed mitigation (i.e. level of financial contributions to improving and enhancing overall open space and biodiversity provision).
- **Neutral effects** are anticipated in relation to the landscape and historic environment SEA themes. The RNP policy framework seeks to ensure growth in the parish protects and where possible enhances Redgrave's historic assets, landscape features and local villagescape; in addition to identified important local views.

- **Neutral effects** are also anticipated in relation to the transportation theme. While sustainable transport opportunities in the village are limited and car reliance high, the RNP seeks to deliver new homes in a sustainable location, supporting active travel and connected communities.
- **Minor negative effects** are predicted in relation to land, soil and water resources given the proposed site allocation will result in the loss of greenfield and agricultural land.

Cumulative effects

Cumulatively the RNP seeks to complement the provisions of the emerging Joint Local Plan by; allocating land to meet residual housing needs, seeking development proposals which contribute to the locally required mix of housing types and tenures, and supporting delivery of high-quality development which complements its setting, settlement form and village identity.

In terms of in-combination effects on biodiversity Habitat sites, the HRA screening states that *“although the Plan allocates sites for development, the parish does not lie within an evidenced Zone of Influence for recreational disturbance impacts on Habitats sites in combination with other plans and projects. There is therefore no requirement for any mitigation measures to be embedded in the Plan to avoid any likely significant effects. Monitoring of recreational disturbance impacts is not currently required but may be requested in the future from Norfolk LPAs from Mid Suffolk DC.”*

Cumulative positive effects are therefore anticipated overall.

Recommendations

The first draft of the SEA Environmental Report shared with Redgrave Parish Council included the following recommendation:

The supporting policy text for Policy RED 10 states that, *“given the wealth of historic assets (designated and non-designated) within Redgrave, early consultation with Suffolk County Council’s Archaeological Service is encouraged for advice on any proposals before they reach application stage.”* To strengthen the RNP, it is recommended that this supporting text be moved into policy RED2. This would increase the weight of the requirement, avoiding adverse effects at an early stage through the implementation of neighbourhood planning policy.

This recommendation has been incorporated into the final submission version of the RNP.

Next steps

Part 3 of the report explains the next steps that will be taken as part of plan-making and SEA.

Plan finalisation

Following submission, the plan and supporting evidence will be published for further consultation, and then subjected to Independent Examination. At Independent Examination, the RNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

Assuming examination leads to a favourable outcome, the RNP will then be subject to a referendum, organised by Mid Suffolk District Council. If more than 50% of those who vote agree with the Plan, then it will be 'made'. Once 'made', the RNP will become part of the Development Plan for Mid Suffolk District, covering the defined Neighbourhood Plan Area.

Monitoring

The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.

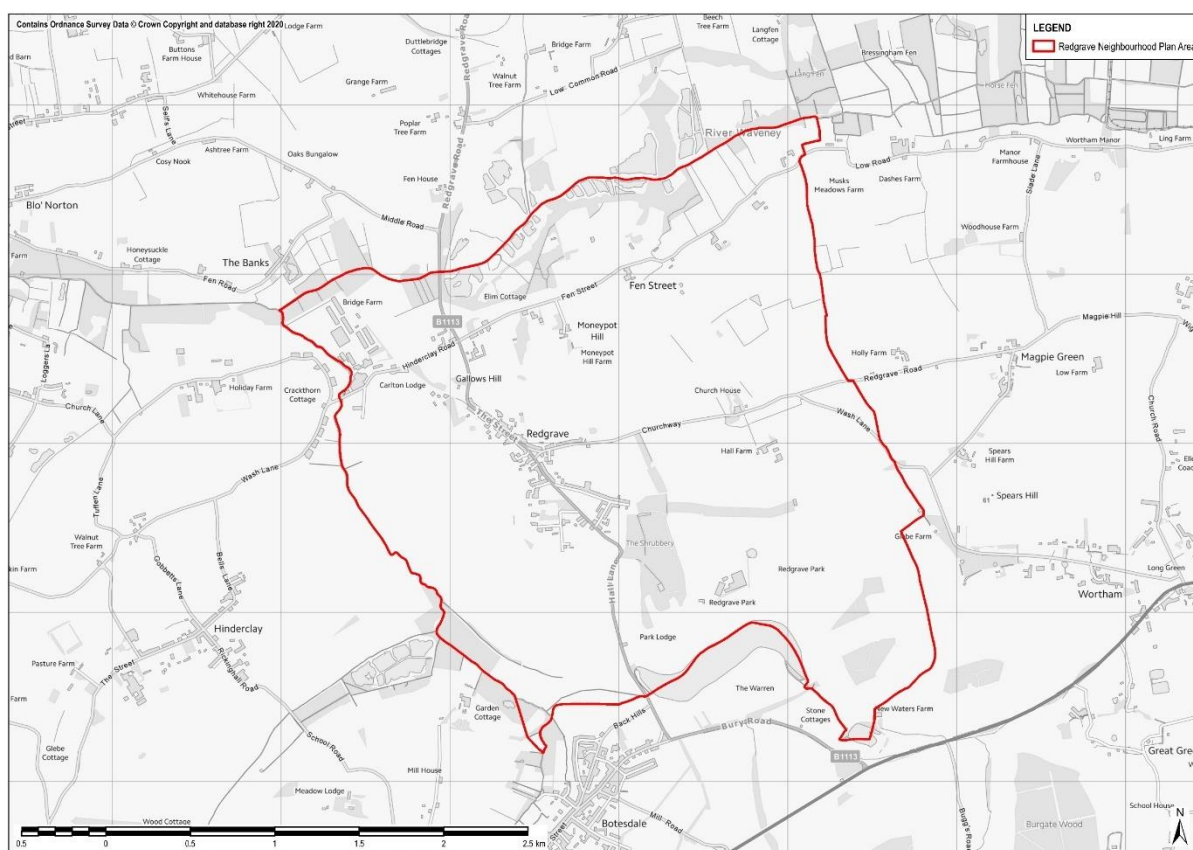
It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by Mid Suffolk District Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the RNP that would warrant more stringent monitoring over and above that already undertaken by Mid Suffolk District Council.

1. Introduction

Background

- 1.1 AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Redgrave Neighbourhood Plan (RNP).
- 1.2 The RNP is being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. It is being developed in the context of the adopted Mid Suffolk Core Strategy (2008) and its Focused Review (2012) and saved policies of the 1998 Local Plan, as well as the emerging Babergh and Mid Suffolk Joint Local Plan.
- 1.3 Once 'made' the RNP will have material weight when deciding on planning applications in the Plan area, alongside the Mid Suffolk Local Development Framework. The RNP area is identified in **Figure 1.1** below.

Figure 1.1: Redgrave Neighbourhood Plan area



Document Path: \\UKBAS\IP\PL\1400 - Management Services\004 - Information Systems\6571087_neighbourhood_Plan_ORB_2018_2022\02_Maps\Redgrave NP SEA\figure 1.1 - RedgraveNeighbourhood Plan Area.mxd

SEA explained

- 1.4 SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the RNP is a legal requirement.²

² Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process completed in accordance with Regulation 9(1) of the Environmental

- 1.5 It is a requirement that SEA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on SEA.
- 1.6 In-line with the Regulations, a report (known as the Environmental Report) must be published for consultation alongside the draft RNP that “identifies, describes and evaluates” the likely significant effects of implementing “the plan, and reasonable alternatives”.³ The report must be taken into account, alongside consultation responses, when finalising the plan.
- 1.7 More specifically, the Report must answer the following three questions:
 8. What has plan-making/ SEA involved up to this point?
 - Including in relation to ‘reasonable alternatives’.
 9. What are the SEA findings at this stage?
 - i.e. in relation to the draft plan
 10. What happens next?

This Environmental Report

- 1.8 This report is the Environmental Report for the RNP. It is published alongside the ‘Submission’ version of the Plan, under Regulation 16 of the Neighbourhood Planning Regulations (2012, as amended).
- 1.9 This report essentially answers questions 1, 2 and 3 in turn, to provide the required information.⁴ Each question is answered within a discrete ‘part’ of the report.
- 1.10 However, before answering Q1, two initial questions are answered to further set the scene; what is the RNP seeking to achieve? And what is the scope of the SEA?

Assessment of Plans and Programmes Regulations (‘the SEA Regulations’). The RNP was subject to formal screening in 2020.

³ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

⁴ See Appendix A for further explanation of the regulatory basis for answering certain questions within the Environmental Report, and a ‘checklist’ explaining more precisely the regulatory basis for presenting certain information.

2. What is the RNP seeking to achieve?

Introduction

2.1 This section considers the strategic planning policy context provided by the adopted Mid Suffolk Local Development Framework, as well as the emerging Babergh and Mid Suffolk Joint Local Plan, before then presenting the RNP vision and objectives.

Strategic planning policy context

2.2 The adopted Local Development Framework for Mid Suffolk consists of:

- Core Strategy 2008 and the Core Strategy Focused Review 2012;
- Stowmarket Area Action Plan 2013;
- Saved policies of the 1998 Mid Suffolk Local Plan; and
- Suffolk Minerals and Waste Local Plan (SMWLP) (2020).

2.3 The emerging Babergh and Mid Suffolk Joint Local Plan (JLP) will provide a framework for development up to 2036 and will replace the Core Strategy Focused Review and saved policies of the 1998 Local Plan. Minerals and waste planning will continue to be the responsibility of Suffolk County Council.

2.4 The RNP must be in general conformity with the strategic policies of the Local Development Framework, as per footnote 16 of the National Planning Policy Framework (NPPF) (2019). Additionally, the NPPF states that “*local planning authorities may give weight to relevant policies in emerging plans*” according to set criteria which includes its stage of preparation. The emerging Joint Local Plan is at a later stage of development, with consultation on a ‘Pre-Submission’ version of the Plan during November and December 2020. The Joint Local Development Scheme (July 2020) identifies that following this consultation, submission of the Joint Local Plan is anticipated early in 2021.

2.5 The settlement hierarchy set out in the adopted Core Strategy (and its Focused Review, 2012) identifies Redgrave as a ‘Secondary Village’ which will accommodate some provision for meeting local housing needs, in particular; affordable housing. However, no specific provisions or allocations are identified made.

2.6 Table 03 in the emerging JLP identifies a newly proposed settlement hierarchy which classifies Redgrave as ‘Hinterland Village’. Under Policy SP03 (Settlement Hierarchy) the scale and location of development will depend upon the role of settlement in the settlement hierarchy as well as “*the spatial distribution, the capacity of existing physical and social infrastructure or new/enhanced infrastructure, as well as having regard to the natural, built and historic environment.*”

2.7 Policy SP04 (Housing Spatial Distribution) directs 10% of the proposed growth in Mid Suffolk to the Hinterland Villages of the District, which is supported by Table 04 identifying the minimum housing requirement for Neighbourhood Plan areas. Table 04 identifies a total requirement for 11 homes in Redgrave between 2018 and 2036, and that 2 homes have outstanding planning

permission since 2018 and contribute to this identified need. This leaves a residual strategic requirement for an additional 9 homes over the plan period.

- 2.8 Policy LS01 (Hinterland and hamlet sites) allocates the 'Land south of B113 Hall Lane' for 9 dwellings. This allocation site has recently gained planning permission (DC/18/05289/FUL), and the residual housing needs for the Parish in the period up to 2036 are considered to have been met.

RNP vision and objectives

- 2.9 The following vision has been established for the RNP:

"By 2036 Redgrave will continue to be a small, beautiful village that has developed sustainably. It will develop in proportion to its rural character; rich in green spaces surrounded by a diverse rural environment with a better balance of housing to meet the needs of its residents".

- 2.10 To achieve this vision, seven community objectives have been identified across three themes:

Community

11. To provide for housing that meets the needs of the local population and achieve a better balance of available housing.
12. To improve the community infrastructure of Redgrave, in order to provide more places for people, young and old to undertake their work, leisure and community pursuits and to support the health and wellbeing of residents.

Natural & Historic Environment

13. To protect and enhance Redgrave's natural and historic assets.
14. To protect and maintain Redgrave's rural village identity and ensure that new development respects its form and character.
15. To encourage low carbon initiatives and future sustainability.

Business & Infrastructure

16. To protect the existing business base of the village and ensure that the relationship between business and residents remains in harmony.
17. To seek to improve the physical infrastructure that serves the residents and businesses of Redgrave.

3. What is the scope of the SEA?

Introduction

- 3.1 The aim here is to introduce the reader to the scope of the SEA, i.e. the key issues, sustainability themes and objectives that should be a focus of the assessment of the plan and reasonable alternatives. The baseline information and policy review that has informed the identification of key issues and SEA objectives is presented in **Appendix B**.

Consultation

- 3.2 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 the Environment Agency, Historic England and Natural England.⁵ As such, these authorities were consulted in January 2021. The responses received are detailed in **Appendix B**.

Key issues

- 3.3 The key issues identified for each SEA theme are detailed below.

Biodiversity

- 3.4 The Waveney Valley Fens SAC and Redgrave & South Lopham Fens Ramsar site overlaps with the Neighbourhood Plan area to the north east. The HRA Screening Report (2020) concludes that the draft RNP will not lead to Likely Significant Effects on any internationally designated habitats, either alone or in combination with other plans and projects.
- 3.5 The County Wildlife Site, Local Wildlife Site and wider habitats within the Plan area host a variety of plant and animal species that contribute to biodiversity and support ecological connectivity. These areas should be retained and enhanced where possible.
- 3.6 New development provides opportunities to enhance biodiversity in the Neighbourhood Plan area and deliver biodiversity net gains.

Climate change

- 3.7 The Plan area is partially affected by areas of high fluvial flood risk, however these areas do not infiltrate the main settlement of Redgrave, so are unlikely to pose a substantial risk with regards to development.
- 3.8 CO₂ emissions for Mid Suffolk have steadily declined over the period of 2005-2018, in line with regional and national statistics, but at a slightly slower rate. Given that the transport sector is the largest contributor to emissions in the district, any development in the Plan area should consider the need to provide access to sustainable or low carbon travel options, that meet the needs of consumers and improves mobility, whilst also reducing emissions.

⁵ These consultation bodies were selected “*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes*” (SEA Directive, Article 6(3)).

- 3.9 Mid Suffolk District Council has recently declared a climate emergency and has resolved to support local authorities (and, by extension, Neighbourhood groups) to help tackle climate change through plan-making where possible. The Neighbourhood Plan should seek to maximise opportunities to support Council actions in tackling climate change. This may include through encouraging renewable energy technologies in small-scale developments in the Parish; i.e solar PV and water heating, continuing the upward trend seen across the district.

Landscape

- 3.10 The Suffolk County Council Landscape Character Assessment (2008) and Mid Suffolk and Babergh Joint Landscape Guidance identifies Redgrave as falling within the 'Ancient Plateau Claylands' LCA. Key objectives set out for the LCA reflect the potential for inappropriate development to adversely impact upon the rural nature and setting of the parish. Unique landscape features may require further safeguarding in development, including woodland, hedge lines, and parkland; to maintain the character and condition of the landscape.
- 3.11 Land to the south and east of village has been previously designated as a SLA, and will be designated through the RNP as an Area of Local Landscape Sensitivity (ALLS). In line with the forthcoming ALLS designation, development should be designed to be in harmony with the special characteristics of the area and follow the broad design objectives and principles referred to above.
- 3.12 Important viewpoints have been identified in Redgrave, which reflect the special qualities of the Neighbourhood Plan area and are highly valued by local residents. Development should seek to preserve these views and countryside visibility where possible.

Historic environment

- 3.13 There are 49 listed buildings within the Neighbourhood Plan area, over half of which lie within the Redgrave Conservation Area. One listed building is Grade I listed, and two are Grade II* listed. Development within the plan area requires the preservation and maintenance of these assets and their settings, subject to detailed matters of design and layout.
- 3.14 Assets acknowledged for their local heritage value could benefit from additional policy protections and provisions within the Redgrave Neighbourhood Plan.

Land, soil and water resources

- 3.15 With extensive areas of high-quality agricultural land surrounding the settlement, it will be important that future development seeks to avoid loss of the highest-quality areas of BMV agricultural land where possible.
- 3.16 Development in the Plan area will need to consider impacts on mineral resources given its location within a Mineral Consultation Area.
- 3.17 The Little Ouse is classified as in poor quality status both ecologically and chemically. Opportunities to improve water quality through new development should be sought, for example through the provision of sustainable drainage systems and measures to remove pollutants from water.

Population and communities

- 3.18 The population of Redgrave decreased by 8.0% between the period of 2011 and 2019 (based on mid-year estimates). This is in contrast to comparative figures for Mid Suffolk the East and England as a whole; which all saw an increase in population by 6-7%. Additionally, a large proportion of residents in the Plan area are aged 60 or over (32.46%). Development should acknowledge the specialist needs of an ageing population with regards to their accessibility to key community services, such as recreational areas and shops.
- 3.19 A high proportion of residents have level 4 qualifications and above (33.9%). However, there is a considerable contrast between deprivation levels in the east and the west of the parish; with the west (including the main village settlement) being more deprived. It is important that new development seeks to support low levels of deprivation by delivering development that enables sustainable economic growth of the village; linking employment and other key services to new homes and the natural environment.

Health and wellbeing

- 3.20 Planning should seek to improve activity within the draft Plan area through the maintenance and provision of local green spaces (notably addressing shortfalls discussed above), active travel routes, recreational opportunities and countryside access.
- 3.21 Development should support high levels of local accessibility (notably to increase the uptake active travel), maintaining and enhancing connectivity and inclusivity.
- 3.22 Access to health services is limited, which if exacerbated could adversely impact upon residents' overall wellbeing. Where possible development should seek to improve access to health services and community facilities within and surrounding the draft Plan area.

Transportation

- 3.23 In the absence of strategic transport interventions, growth in the Neighbourhood Plan area is likely to continue prevalent trends in which residents' favour private vehicles as the transport mode of choice/ necessity. It will therefore be important to locate any additional growth in areas which maximise pedestrian and cycle route connections within the settlement and beyond and support higher levels of self-containment.
- 3.24 Higher than average percentages of residents in the Plan area work from home when compared to the district, region and nation and this trend is forecast to become more prevalent when considering the ongoing pandemic. Opportunities to capitalise on this positive trend should be maximised.
- 3.25 Public transport is variable. Bus services are few and infrequent, and there are no train stations within the draft Plan area. Future development could seek to ensure appropriate connections to existing infrastructure and improve access to the extensive PRoW network within and surrounding the Plan area, encouraging the use of active travel.

SEA framework

3.26 The SEA scope is summarised in a list of themes, objectives and assessment questions, known as the SEA framework. **Table 3.1** below presents the SEA framework as broadly agreed in 2021.

Table 3.1: SEA framework

SEA theme	SEA objective	Assessment questions (will the proposal help to...)
Biodiversity	Protect and enhance biodiversity and geodiversity sites and features where possible.	<ul style="list-style-type: none"> • Protect and enhance European, Nationally and locally designated sites, including supporting habitats and mobile species that are important to the integrity of these sites? • Protect and enhance priority habitats and species and the areas that support them? • Achieve a net gain in biodiversity? • Support enhancements to multifunctional green infrastructure networks? • Support access to, interpretation and understanding of biodiversity and geodiversity?
Climate change	Reduce the contribution to climate change made by activities within the Neighbourhood Plan area	<ul style="list-style-type: none"> • Reduce the number of journeys made by polluting vehicles? • Promote the use of sustainable modes of transport including walking, cycling and public transport? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources? • Reduce energy consumption from non-renewable resources?
	Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding	<ul style="list-style-type: none"> • Avoid development in areas at risk of flooding, considering the likely future effects of climate change? • Ensure that inappropriate development does not take place in areas at higher risk of flooding, considering the likely future effects of climate change? • Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change? • Sustainably manage water runoff, reducing surface water runoff (either within the plan area or downstream)? • Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan Area? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape and villagescape	<ul style="list-style-type: none"> • Protect and enhance the setting of the SLA/ AILLQ? • Preserve the integrity of the national and local landscape character areas covering the Neighbourhood Plan area?

SEA theme	SEA objective	Assessment questions (will the proposal help to...)
Historic environment	Protect, conserve and enhance the historic environment within and surrounding the Neighbourhood Plan area	<ul style="list-style-type: none"> • Conserve and enhance local diversity and character? • Protect locally important viewpoints contributing to the sense of place and the visual amenity of the Neighbourhood Plan area? • Retain and enhance landscape features that contribute to the rural setting, including trees and hedgerow. <hr/> <ul style="list-style-type: none"> • Conserve and enhance buildings and structures of architectural or historic interest, both designated and non-designated, and their setting? • Conserve and enhance the special interest, character and appearance of locally important features and their settings? • Support the integrity of the historic setting of key monuments of cultural heritage interest as listed on the Suffolk HER? • Support access to, interpretation and understanding of the historic evolution and character of the environment? • Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies?
Land, soil and water resources	Ensure the efficient and effective use of land.	<ul style="list-style-type: none"> • Avoid the loss of high-quality agricultural land resources? • Avoid the unnecessary sterilisation of, or hindering of access to mineral resources in the Plan area? • Promote the use of previously developed land, vacant & derelict brownfield land opportunities?
	Protect and enhance water quality and use and manage water resources in a sustainable manner.	<ul style="list-style-type: none"> • Support improvements to water quality? • Ensure the timely provision of wastewater infrastructure? • Ensure appropriate drainage and mitigation is delivered alongside development? • Protect groundwater and surface water resources from pollution? • Maximise water efficiency and opportunities for water harvesting and/ or water recycling?
Population and communities	Ensure growth in the Parish is aligned with the needs of all residents and capacity of the settlement and social infrastructure, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.	<ul style="list-style-type: none"> • Provide everyone with the opportunity to live in good quality, and affordable housing? • Support the provision of a range of house types and sizes? • Meet the needs of all sectors of the community? • Provide flexible and adaptable homes that meet people's needs, particularly the needs of an ageing population? • Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people? • Encourage and promote social cohesion and active involvement of local people in community activities?

SEA theme	SEA objective	Assessment questions (will the proposal help to...)
Health and wellbeing	Improve the health and wellbeing of residents within the Neighbourhood Plan Area.	<ul style="list-style-type: none"> • Promote the use of sustainable building techniques, including use of sustainable building materials in construction? • Minimise fuel poverty? • Maintain or enhance the quality of life of existing local residents? • Support the retention and improvement of community facilities? • Support the provision of land for allotments and cemeteries?
Transportation	Promote sustainable transport use and reduce the need to travel.	<ul style="list-style-type: none"> • Support the key objectives within the Suffolk Local Transport Plan to encourage more sustainable transport? • Enable sustainable transport infrastructure enhancements? • Ensure sufficient road capacity to accommodate new development? • Promote improved local connectivity and pedestrian and cyclist movement? • Facilitate on-going high levels of home and remote working? • Improve road safety? • Reduce the impact on residents from the road network? • Improve parking facilities?

Part 1: What has plan-making/ SEA involved to this point?

4. Introduction (to Part 1)

Overview

- 4.1 Whilst work on the Neighbourhood Plan has been underway for some time, the aim here is not to provide a comprehensive explanation of work to date, but rather to explain work undertaken to develop and appraise reasonable alternatives.
- 4.2 More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to addressing an issue that is of central importance to the Plan, namely the allocation of land for housing, or alternative sites. Whilst strategic housing requirements have been met through existing development commitments, land is currently being identified through the RNP to deliver additional housing specifically targeted at a need for smaller homes in the Parish for residents to downsize into.

Why focus on sites?

- 4.3 The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing, given the following considerations:
- RNP objectives, particularly the core objective to understand housing needs and allocate sites for development;
 - Housing growth is known to be a matter of key interest amongst residents and other stakeholders; and
 - The delivery of new homes is most likely to have a significant effect compared to the other proposals within the Plan. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

Structure of this part of the report

- 4.4 This part of the report is structured as follows:
- **Chapter 5** - explains the process of establishing reasonable alternatives;
 - **Chapter 6** - presents the outcomes of appraising reasonable alternatives;
 - **Chapter 7** - explains reasons for progressing the preferred option, in light of the appraisal.

5. Establishing reasonable alternatives

Introduction

- 5.1 The aim here is to explain the process that led to the establishment of alternatives sites and thereby present “*an outline of the reasons for selecting the alternatives dealt with*”.⁶
- 5.2 Specifically, there is a need to explain the strategic parameters that have a bearing on the establishment of options (in relation to the level and distribution of growth) and the work that has been undertaken to date to examine site options (i.e. sites potentially in contention for allocation in the RNP). These parameters inform the identification of ‘reasonable alternatives’ at this current stage.

Strategic parameters

- 5.3 Working within the strategic parameters of the emerging Babergh and Mid-Suffolk Joint Local Plan (JLP) – as an advanced plan document that aligns with the RNP plan period – the identified housing needs for the Plan area has been met through committed sites (see **para’s 2.7 - 2.8**) as identified in the emerging JLP. On this basis, there is no residual housing requirement for the RNP to deliver new homes during the plan period.
- 5.4 However, evidence base development, including local surveys, have identified a community preference for new smaller homes in the Parish, which could allow residents to down-size. This need for smaller homes is considered unlikely to be fully met by the existing committed development sites in the pipeline. For this reason, the Parish Council have decided to explore the potential to allocate additional sites through the RNP that are targeted at delivering bungalows to meet the identified need for smaller homes in the Parish.

Site options

- 5.5 As a starting point, the 2019 Babergh and Mid Suffolk Joint Strategic Housing and Economic Land Availability Assessment (SHELAA) identified three available options in Redgrave:
- SS0486: Land south of Churchway;
 - SS0818: Land south of B113 Hall Lane, opposite junction with Half Moon Lane; and
 - SS1042: Land north-east of the Street.
- 5.6 Of these three sites, only one was identified through the SHELAA as potentially suitable for allocation, this being site SS0818 ‘Land south of B113 Hall Lane, opposite junction with Half Moon Lane’.
- 5.7 Site SS0486 ‘Land south of Churchway’ was discounted through the SHELAA due to its poor connectivity with the existing settlement and poor access to core services and facilities. Site SS1042 ‘Land north-east of the Street’ was

⁶ Schedule 2(8) of the SEA Regulations

discounted due to the low number of homes it could deliver (less than five dwellings without the demolition of a listed building).

- 5.8 Site SS0818 has been taken forward as an allocation in the emerging JLP and has since gained planning permission for nine homes. Furthermore, the emerging JLP designates part of site SS0486 as open space.
- 5.9 Following on from the SHELAA, the Parish Council undertook a further local ‘call for sites’ in 2019 and five sites were submitted through this process as follows:
- Site 1: Land off Mill Lane;
 - Site 2: Godfathers Meadow, The Green;
 - Site 3: Land at Churchway;
 - Site 4: Land at Half Moon Lane; and
 - Site 5: Land adjacent to Jade House, The Street.
- 5.10 Of note, Site 3 ‘Land at Churchway’ is a larger site area than submitted and considered through the original SHELAA as site SS0486 ‘Land south of Churchway’ (including the land currently proposed as designated open space in the emerging JLP).
- 5.11 Furthermore, it was recognised at this stage that less than 5 homes at SHELAA site SS1042 ‘Land north-east of the Street’ could be appropriate as an option for the RNP.
- 5.12 Taking the above into account, the five sites listed above, and SHELAA site SS1042 were taken forward for assessment in the Redgrave Neighbourhood Plan Site Options and Assessment (SOA) Report produced by AECOM in March 2020.
- 5.13 The SOA found that three of the six sites were potentially suitable for allocation in the NDP, one site to be partially suitable, and two sites unsuitable for allocation. **Table 5.1** below identifies the conclusions of the assessment in more detail.

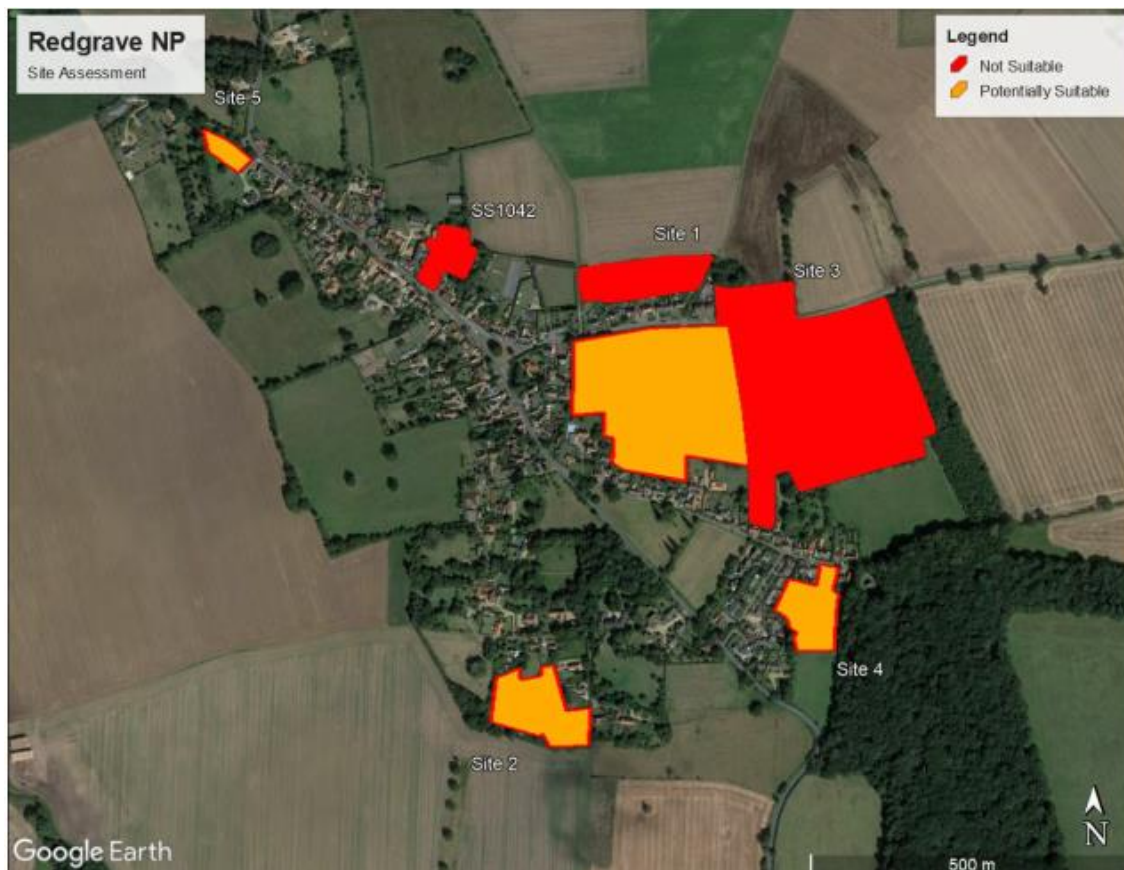
Table 5.1: AECOM SOA Report findings

Site reference	Site name	SOA findings
Site 1	Land off Mill Lane	The site was found to be unsuitable for allocation in the NDP due to access constraints.
Site 2	Godfathers Meadow, The Green	The site was found to be potentially suitable subject to further consultation with Mid Suffolk District Council and the Highways Authority, as well as agreement for access from the neighbouring landowner.
Site 3	Land at Churchway	The western part of the site only is considered to be potentially suitable for allocation subject to appropriate re-provision of community facilities and consultation with Mid Suffolk District Council on allocation of the site outside of the settlement boundary.

Site reference	Site name	SOA findings
		The remainder of the site is not considered to be suitable given landscape impacts and its encroachment into open countryside
Site 4	Land at Half Moon Lane	The site was found to be potentially suitable subject to consultation with the Highways Authority regarding access and scale of development, as well as with Mid Suffolk District Council on allocation of the site outside of the settlement boundary.
Site 5	Land adjacent to Jade House, The Street	The site was found to be potentially suitable subject to consultation with the Highways Authority regarding safe vehicular access, as well as with Mid Suffolk District Council on allocation of the site outside of the settlement boundary.
SS1042	Land north-east of the Street	The site was found to be unsuitable for allocation due to constrained access and exceptional circumstances not being demonstrated for demolition of the listed building on site or for significant access works to be undertaken within the curtilage of the building in line with Local Plan policy.

5.14 The six sites assessed in the SOA are depicted in **Figure 5.1** below.

Figure 5.1: Site options assessed in the AECOM SOA



5.15 Following on from this work, the Parish Council chose to allocate a small proportion of Site 3 ‘Land at Churchway’, as depicted in **Figure 5.2** whilst recognising the need to compensate any loss of open space. This proposed allocation site was consulted on in the Regulation 14 draft RNP in September 2020.

Figure 5.2: Regulation 14 draft RNP allocation site



Establishing reasonable alternatives

5.16 The Regulation 14 consultation draft RNP led to a positive screening opinion that SEA is required, which is why the SEA at this stage, seeks to explore alternatives to the preferred allocation site at Churchway.

5.17 Following on from the SOA, those sites found to be potentially suitable, alongside the Draft RNP allocation site form the basis of the potential alternative options.

5.18 However, the Parish Council are seeking small scale development to meet targeted needs for smaller homes. As a result, the larger site area that was found to be potentially suitable at Churchway ‘Site 3’ is dismissed as an option at this stage. This is because it will allocate significantly more land than is required to meet the need for smaller homes and would result in a greater loss of open space, with significant compensation/ mitigation requirements. Whilst the larger site is not considered reasonable; a smaller area of the site could be carried forward for further consideration.

5.19 Whilst previous proposals for ‘Site 2’ included a solar farm, the landowners have advised that they are unlikely pursue the solar farm element of the proposal. The site is therefore considered for a small-scale scheme delivering potentially 2 new homes.

5.21 On this basis, the following four sites/ options are identified as 'reasonable alternatives' for the purposes of this SEA:

- **Option 1:** Site 2 - Godfathers Meadows, the Green for up to 2 homes
- **Option 2:** Site 4 - Land at Half Moon Lane for up to 14 homes
- **Option 3:** Site 5 - Land adjacent to Jade House, The Street for up to 3 homes
- **Option 4:** Reduced area at Churchway site for up to 8 dwellings

6. Assessing reasonable alternatives

6.1 This chapter provides the assessment of the four alternative options identified for appraisal (established in the previous chapter). The options are as follows:

- Option 1: Site 2 - Godfathers Meadows, the Green for up to 2 homes
- Option 2: Site 4 - Land at Half Moon Lane for up to 14 homes
- Option 3: Site 5 - Land adjacent to Jade House, The Street for up to 3 homes
- Option 4: Reduced area at Churchway site for up to 8 dwellings

Methodology

6.2 For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping (see **Table 3.1**) as a methodological framework. **Green** is used to indicate significant positive effects, whilst **red** is used to indicate significant negative effects. Minor effects are also identified, with **light green** indicating minor positive effects and **amber** indicating minor negative effects. Where appropriate **neutral** effects, or **uncertainty** will also be noted. Uncertainty is noted with grey shading.

6.3 Every effort is made to predict effects accurately; however, where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

6.4 Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the option or options that are preferred from an SEA perspective, with 1 performing the best.

6.5 Finally, it is important to note that effects are predicted taking into account the criteria presented within Regulations.⁷ So, for example, account is taken of the duration, frequency and reversibility of effects.

⁷ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Assessment findings

Biodiversity

	Option 1 (Godfathers Meadows)	Option 2 (Land at Half Moon Lane)	Option 3 (Land adj. Jade House)	Option 4 (reduced area at Churchway)
Likely effect	Neutral	Neutral	Neutral	Neutral
Rank	2	4	3	1

- 6.6 All sites are located within the Impact Risk Zone of the Redgrave and Lopham Fens SSSI, which is also designated as a Ramsar site, Special Area of Conservation (SAC) and National Nature Reserve (NNR), with Options 3 and 4 located slightly closer to the designated sites than Options 1 and 2. Despite this, development would not be at a scale (50 or more homes) which would trigger further consultation requirements with Natural England.
- 6.7 However, it is recognised that development at any of the options is likely to increase recreational pressures on the nearby designated sites to some degree. By its location adjacent to proposed open space, Option 4 could provide enhanced mitigation for these effects; by supporting development with alternative areas for recreation. However, it is noted that development at Option 4 would result in the partial loss of proposed open space; which would need to be suitably mitigated to avoid any associated negative effects for biodiversity.
- 6.8 None of the options are known to contain any Priority Habitats; however, Option 2 lies adjacent to an area of deciduous woodland, and appropriate boundary treatment may be required to reduce the effects of disturbance, noise and light pollution (e.g. the inclusion of a buffer between the development site and Priority Habitat).
- 6.9 Overall, all sites are small-scale with good potential to minimise impacts on designated biodiversity. Ultimately national and local plan policies seek demonstrable biodiversity net gains in development; however, given the small-scale of development proposed, these gains are unlikely to result in any significant deviations from the baseline. As a result, broadly neutral effects are considered likely for all options. Whilst the Options are ranked according to the size of development at the site, Option 4 is singled out as best performing given its location adjacent to proposed open space, mitigating the need to travel to designated sites for recreation to some degree.

Climate change

	Option 1 (Godfathers Meadows)	Option 2 (Land at Half Moon Lane)	Option 3 (Land adj. Jade House)	Option 4 (reduced area at Churchway)
Likely effect	Neutral	Neutral	Neutral	Neutral
Rank	=	=	=	=

- 6.10 None of the options are affected by high or medium fluvial flood risk. Options 1 and 2 border small areas of high and medium surface water flood risk where appropriate drainage should be considered in development. This will also be a requirement at Option 3 given the northern extent intersects an area of low surface water flood risk. Option 4 borders an area of low surface water flood risk which extends along Churchway Road. Access to this site should consider the potential effects of surface water flood risk and explore any opportunities to improve sustainable drainage along Churchway Road.
- 6.11 In terms of climate change mitigation, it is considered that there is limited potential to meaningfully differentiate between the sites in relation to reducing contributions to climate change. No site is identified for any significant opportunities to improve upon the baseline. Whilst options could be ranked to some extent in terms of their accessibility to the settlements limited range of services, this is explored under the ‘population and communities’ theme. In the context of Redgrave’s rural location each site is considered to have equal car dependency for accessing services at higher tier settlements; being located on the edge of the existing settlement.
- 6.12 It is considered that there are negligible differences in terms of the ability to achieve ambitious building emissions standards in support of decarbonisation. This is given all sites are relatively small-scale.
- 6.13 Overall, all options are considered likely to lead to broadly neutral effects, and perform generally on par. Despite this, Option 4 is noted for the potential opportunity to improve (road) drainage at Churchway Road.

Landscape

	Option 1 (Godfathers Meadows)	Option 2 (Land at Half Moon Lane)	Option 3 (Land adj. Jade House)	Option 4 (reduced area at Churchway)
Likely effect	Minor negative	Significant negative	Minor negative	Minor negative
Rank	2	4	3	1

- 6.14 All options will involve greenfield development at the settlement edge. Options 1, 2 and 3 are relatively contained by existing tree-lined borders, which provide screening to views into the sites from the surrounding countryside.
- 6.15 Option 3 is located at the northern entrance to the village, and design will need to respond accordingly to its ‘gateway’ location. Development at this location has the potential to affect locally identified important views (in particular the view approaching the village from the north, along The Street looking south).

- 6.16 Option 4 will border proposed open space (as proposed in the Babergh and Mid Suffolk Joint Local Plan), with limited impacts in terms of countryside views. However, development at the site would result in the partial loss of proposed open space and the contribution of open spaces to landscape character is recognised. Appropriate compensation/ mitigation would be required (as identified through the Regulation 14 consultation draft RNP).
- 6.17 Option 2 is located in the east of the settlement, on land that is proposed to be designated as an Area of Local Landscape Sensitivity (ALLS) in the emerging RNP. As a locally valued landscape, development is considered for its potential to lead to negative effects of significance.
- 6.18 Overall, the loss of greenfield land in the settlement under all options is considered likely to lead to minor long-term negative effects. Option 4 has slightly greater potential to integrate as part of the settlement form connecting with proposed open space and is ranked marginally better (and best overall) in terms of its performance as a result. However, this is on the assumption that suitable mitigation will be sought to compensate the partial loss of proposed open space. Option 1 is considered next best performing, whilst extending the settlement edge in south, there is good opportunity for screening and reducing landscape impacts. Option 3 ranks next, due to its gateway location and potential to affect locally identified valued viewpoints. Option 2 is identified for potential negative effects of greater significance and is least preferred in terms of rank. This is given its location within land proposed to be designated in the RNP for its landscape sensitivity.

Historic environment

	Option 1 (Godfathers Meadows)	Option 2 (Land at Half Moon Lane)	Option 3 (Land adj. Jade House)	Option 4 (reduced area at Churchway)
Likely effect	Minor negative	Significant negative	Minor negative	Minor negative
Rank	1	2	1	1

- 6.19 None of the options contain any designated heritage assets; however, Option 2 lies partially within the Redgrave Conservation Area, and the remaining options all lie adjacent to it.
- 6.20 Option 2 is considered for the potential delivery of an additional 14 homes within the southern extent of the conservation area. There is the potential for development through Option 2 to interact with permitted development in the south of the conservation area to have a cumulative negative effect on the historic environment. The site is also identified as part of a larger locally valued historic village green on the Suffolk Historic Environment Record (HER).
- 6.21 Options 1, 3 and 4 are also located adjacent to the conservation area, and development at any of these options has the potential to affect its setting, particularly views into and out of the conservation area.
- 6.22 Overall, Option 2 is highlighted for potential significant negative effects, particularly when considering the cumulative effects of development within this part of the conservation area. As a result, Option 2 is considered the worst performing of the options. The potential for minor long-term negative effects is

identified as a result of development at the remaining options, given the potential to affect the setting of the conservation area. However, the options are not differentiated in terms of rank.

Land, soil and water resources

	Option 1 (Godfathers Meadows)	Option 2 (Land at Half Moon Lane)	Option 3 (Land adj. Jade House)	Option 4 (reduced area at Churchway)
Likely effect	Minor negative	Minor negative	Minor negative	Minor negative
Rank	=	=	=	=

- 6.23 All options are located on greenfield land, the loss of which has the potential for minor long-term negative effects in relation to soil resources. It is recognised however, that this reflects a lack of available brownfield alternatives.
- 6.24 In terms of the location of the best and most versatile agricultural land, a detailed classification has not been undertaken in all parts of the Neighbourhood Plan area. As such, there is a need to rely on predictive assessments⁸ and these indicate that the land immediately surrounding the settlement area has a 'low' likelihood of containing high-quality agricultural land. Whilst it is recognised that site level surveys would be required to determine the precise nature and significance of effects, no significant negative effects are considered likely at this stage.
- 6.25 All options fall within a Minerals Consultation Area. Whilst the sites are not differentiated in respect of potential effects at this stage; the requirement for further consultation under all options is noted.
- 6.26 In terms of water resources, it is anticipated that the Water Resources Management Plan (WRMP) prepared by Anglian Water will address the long-term water resource issues associated with growth in the Neighbourhood Plan area. Furthermore, the low level of growth proposed under all options is unlikely to lead to significant effects.
- 6.27 Overall, the loss of greenfield and agricultural land is considered likely to lead to minor long-term negative effects under all options. There are also no distinctive differences between the options; which are considered to all perform broadly on par.

⁸ Natural England (2017) Likelihood of Best and Most Versatile (BMV) Agricultural Land – Strategic scale map Eastern Region [online] available at: <http://publications.naturalengland.org.uk/category/5208993007403008>

Population and communities

	Option 1 (Godfathers Meadows)	Option 2 (Land at Half Moon Lane)	Option 3 (Land adj. Jade House)	Option 4 (reduced area at Churchway)
Likely effect	Minor positive	Minor positive	Minor positive	Minor positive
Rank	3	1	3	2

- 6.28 The residual housing needs identified at the district level have already been met through committed development sites, and development at any of the options would be targeted at meeting locally identified needs for smaller homes to downsize into. As a result, all options are considered likely to lead to minor long-term positive effects.
- 6.29 By delivering more than 10 homes, Option 2 would be captured by Policy SP02 of the emerging Babergh and Mid Suffolk Joint Local Plan to develop a proportion of affordable housing. As such, positive effects of greater significance could be anticipated under this option.
- 6.30 Whilst all sites connect relatively well with the settlement area, Option 4 is located more centrally, with easier access to the local services and facilities along The Street. None of the options are at a scale that could deliver any new facilities or significant access improvements.
- 6.31 Overall, minor long-term positive effects are considered likely under all options, but effects are likely to benefit a greater range of residents under Option 2, through the potential incorporation of an element of affordable housing. As a result, Option 2 is considered to perform better than Options 1, 3 and 4. By its more central location providing easier access to local services and facilities, Option 4 is considered the next best performing option; performing marginally better than Options 1 and 3.

Health and wellbeing

	Option 1 (Godfathers Meadows)	Option 2 (Land at Half Moon Lane)	Option 3 (Land adj. Jade House)	Option 4 (reduced area at Churchway)
Likely effect	Neutral	Neutral	Neutral	Neutral
Rank	2	2	2	1

- 6.32 Existing healthcare facilities are located outside of the settlement area and as such, all options are considered to perform broadly on par, i.e. residents at any of the sites will need to travel to access healthcare services.
- 6.33 The parish has a good footpath network, which connects directly with each of the options. Option 4 is noted for its direct footpath access (off Churchway) to Redgrave and Lopham Fens National Nature Reserve, as a key recreational facility supporting residents.
- 6.34 However, Site 4 would require compensation measures to mitigate the partial loss of proposed open space at Churchway. Whilst the potential impacts are recognised, it is assumed that suitable mitigation will be provided (as required through the Regulation 14 draft of the RNP) and the direct access for new

residents to the remaining adjacent area of open space is also recognised for its potential benefits in terms of resident health and wellbeing.

- 6.35 Overall, through its more direct connections with recreational space and proposed open space, Option 4 is considered to perform marginally better than Options 1, 2 and 3. Despite this, overall all options are considered likely to lead to broadly neutral effects, with no significant deviation from the baseline.

Transportation

	Option 1 (Godfathers Meadows)	Option 2 (Land at Half Moon Lane)	Option 3 (Land adj. Jade House)	Option 4 (reduced area at Churchway)
Likely effect	Minor negative	Minor negative	Minor negative	Minor negative
Rank	2	4	3	1

- 6.36 Considering all options are greenfield development, it is likely that all options will require infrastructure development/ improvement to accommodate highways access and ensure safe pedestrian access. Proposals under any of the options will be required to consult with the Highways Authority.
- 6.37 None of the options are likely to deliver significant infrastructure improvements given the scale of development being proposed. Given notably small-scale development at Options 1 and 3, these options are considered likely to have least impacts in terms of additional traffic on local roads. However, none of the options are considered likely to lead to any significant impacts in terms of traffic generation, with the largest proposal (Option 2) only delivering 14 additional homes.
- 6.38 All options have the potential to directly connect with existing footpaths, but of note, Option 4 is located more centrally, with easier access to local services and facilities when compared to the remaining options. Options 1-3 are considered to perform broadly on par in terms of access, with similar potential to walk to local services and facilities.
- 6.39 With existing bus stops located at Churchways and Hall Lane, Options 1, 2 and 4 would benefit from relatively good access to existing sustainable transport infrastructure; with Option 4 performing best overall in this respect. However, it is recognised that bus connections and the frequency of services in the Plan area are relatively few, and that most new residents are likely to continue trends which rely on the private vehicle to access areas outside of the settlement; including Diss train station. Minor negative effects can be anticipated in this respect.
- 6.40 Minor long-term negative effects are anticipated under all of the options overall; due to a likely overall increase in vehicle use in the Plan area under any option. Given the good opportunity to support walkable local journeys at Option 4, this option is considered to perform slightly better than Options 1, 2 and 3 overall. Options 1-3 are only otherwise differentiated by the scale of development proposed at each site, where Option 2 is least preferred when compared to Options 1 and 3 given the greater number of homes proposed at Option 2.

Summary findings

SEA theme

		Option 1 (Godfathers Meadows)	Option 2 (Land at Half Moon Lane)	Option 3 (Land adj. Jade House)	Option 4 (reduced area at Churchway)
Biodiversity	Likely effect	Neutral	Neutral	Neutral	Neutral
	Rank	2	4	3	1
Climate change	Likely effect	Neutral	Neutral	Neutral	Neutral
	Rank	=	=	=	=
Landscape	Likely effect	Minor negative	Significant negative	Minor negative	Minor negative
	Rank	2	4	3	1
Historic environment	Likely effect	Minor negative	Significant negative	Minor negative	Minor negative
	Rank	1	2	1	1
Land, soil and water resources	Likely effect	Minor negative	Minor negative	Minor negative	Minor negative
	Rank	=	=	=	=
Population and communities	Likely effect	Minor positive	Minor positive	Minor positive	Minor positive
	Rank	3	1	3	2
Health and wellbeing	Likely effect	Neutral	Neutral	Neutral	Neutral
	Rank	2	2	2	1
Transportation	Likely effect	Minor negative	Minor negative	Minor negative	Minor negative
	Rank	2	4	3	1

6.41 Overall, Option 2 is notable for potential negative effects of significance in relation to both landscape and the historic environment. This is due to its location within a proposed 'Area of Local Landscape Sensitivity' and the potential for interactions and therefore cumulative negative effects with permitted development on the Redgrave Conservation Area. The site also lies adjacent to an extensive area of woodland Priority Habitat. However, by proposing a greater number of homes, the site does have potential to make a greater contribution to the delivery of affordable homes as well as smaller homes to meet local needs, to the benefit of the local community.

6.42 Compared to Option 2, Option 4 performs notably better in relation to biodiversity, landscape, historic environment and health and wellbeing. This is particularly by virtue of its location adjacent to proposed open space, providing direct recreational access and mitigating such pressures on designated biodiversity sites to some degree. However, this is on the assumption that suitable compensation/ mitigation will be provided for the partial loss of land proposed as open space.

- 6.43 Broadly neutral effects are considered likely for all options overall in relation to biodiversity, climate change and health and wellbeing, with no significant variations from the baseline anticipated.
- 6.44 Given the loss of greenfield and agricultural land under all proposals, minor long-term negative effects are anticipated in relation to the landscape and land, soil and water resource SEA themes. Given any new residents are also likely to continue trends which favour the private vehicle in journeys beyond the settlement confines, minor long-term negative effects are also anticipated in relation to the transportation theme.
- 6.45 Finally, Options 1, 3 and 4 would also need to consider their location within the setting of the Redgrave Conservation Area, in particular in changing views into and out of the designated area.

7. Developing the preferred approach

7.1 The Parish Council's reasons for developing the preferred approach (Option 4: reduced site at Churchway) in light of the alternatives assessment are identified below:

The RNPSG considered all of the site-based evidence, together with the results of the public consultation exercises carried out in November and December 2019 and January 2020, and came to the following conclusions:

Option 1: Godfather's Meadow: *Site not suitable as it does not reflect the questionnaire responses; only provides for two large open market dwellings.*

Option 2: Land at Half Moon Lane: *Site not suitable due to heritage and access constraints*

Option 3: Land adjacent Jade House: *Site not suitable due to previous appeal decisions; site does not reflect the questionnaire responses; only provides for single or up to 2 dwellings.*

Option 4: Land at Churchway (reduced area): *Development of all 3 phases not suitable due to scale heritage, and landscape constraints. Potential for some development to be acceptable on part of phase 1 but only if loss of recreation space can be mitigated and overall benefit to community achieved. Investigate further as preferred option.*

The RNPSG therefore concluded that they would further pursue the option of a small housing allocation at Churchway in the pre-submission version of the Neighbourhood Plan, and that the policy should include appropriate safeguards in respect of landscape and heritage and highways access.

The reasons for proposing the site are as follows:

- 1) It is of sufficient size to provide a mix of housing that accords with the results of the questionnaire e.g. small dwellings, bungalows, and affordable housing.*
- 2) The site is suitable in terms of access, heritage, and landscape constraints.*
- 3) The site is well related to the existing built-up area of the village and easily accessible from the rest of the village.*
- 4) Development will provide a new footpath along the south side of Churchway linking the Activities Centre/carpark with the rest of the village.*
- 5) The site does result in a loss of open space, however there is currently a surplus of open space within Redgrave (according to MSDC Open Space Standards) and the loss can be compensated for.*

6) Development will provide financial contributions to either improving the existing facilities or providing additional facilities e.g. children's play area, sports pitches, provision for Youth.

7) Development of the site can enable the provision of wildlife or biodiversity benefits in the form of a community orchard and wildflower meadow.

*8) The remainder of the existing open space can be identified as a Local Green Space which protects it from further development (See **RED9**).*

*9) The Activities Centre can be identified as a Community Facility which protects it from redevelopment for another use, unless an alternative can be provided (See **RED 4**).*

The preferred allocation strategy (Option 4) has not changed as a result of the SEA, however; the findings of the SEA have built upon the evidence base supporting the key reasons for the progression and rejection of options. This includes notable heritage constraints at Option 2, which could be considered the main alternative option in terms of its ability to provide a suitable scale of development. The progression of both Options 1 and 3 either alone or in combination are also considered less likely to meet the targeted need for smaller homes.

Part 2: What are the SEA findings at this stage?

8. Introduction (to Part 2)

8.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current 'Submission' version of the RNP. This chapter presents:

- An appraisal of the current version of the RNP under the eight SEA theme headings; and
- The overall conclusions at this current stage and recommendations for the next stage of plan-making.

RNP policies

8.2 The RNP puts forward 16 policies to guide development in the Plan area and this includes the housing allocation policy (RED2) which allocates a site of 1ha at 'Churchway' for up to 8 dwellings. **Table 8.1** groups the drafted policies under the three broad policy themes set out within the Neighbourhood Plan.

Table 8.1 RNP policy list

Policy no.	Policy title
Community	
RED1	New Housing
RED2	Housing Allocation
RED3	Housing Type
RED4	Existing Community Facilities
RED5	New or Improved Community Facilities
Natural and Historic Environment	
RED6	Area of Local Landscape Sensitivity (ALLS)
RED7	Protection of Important Public Local Views (TBC)
RED8	Protection of Natural Assets
RED9	Protection of Local Green Spaces
RED10	Protecting Redgrave's Heritage Assets
RED11	The Design of New Development
RED12	Low Carbon and Future Sustainability
Business and Infrastructure	
RED13	New and Existing Business

RED14 Traffic and Highway Safety

RED15 Walking and Cycling

RED16 Drainage and Flood Risk

Methodology

- 8.3 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.2**) as a methodological framework.
- 8.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.
- 8.5 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the Neighbourhood Plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the assessment as appropriate.

9. Assessment of the RNP

Introduction

- 1.1 The assessment is presented below under eight topic headings, reflecting the established assessment framework (see **Section 3**). A final section (**Chapter 10**) then presents overall conclusions.

Biodiversity

- 9.1 Redgrave is known for its valuable and important wildlife, notably being home to Redgrave and Lopham Fen Ramsar Site, Site of Special Scientific Interest (SSSI), National Nature Reserve (NNR), and part of the Waveney and Little Ouse Valley Fens Special Area of Conservation (SAC). Managed by the Suffolk Wildlife Trust, it is the largest remaining area of river valley fen in England (163 acres) and consists of different fen types including saw sedge beds, open water, heathland, shrub and woodland.
- 9.2 A Habitats Regulations Assessment (HRA) Screening Report has been undertaken in order to support the Redgrave Neighbourhood Plan, where the two Habitats sites (Redgrave & South Lopham Fens Ramsar site, and Waveney & Little Ouse Valley Fens SAC) were assessed for any likely significant effects resulting from the draft RNP. The HRA report has screened out impact pathways for recreational disturbance and water quality and quantity, and subsequently no likely significant effects on designated features are likely as a result of the draft RNP alone. It also found that there is currently no potential for any likely significant effects in combination with other plans and projects, and therefore the draft RNP has been screened out for any further assessment (Appropriate Assessment). Based on these findings; the HRA concluded that the Redgrave Neighbourhood Plan Regulation 14 Pre-Submission Draft is not predicted to have any likely significant effect on any Habitats site.⁹
- 9.3 The natural environment and in particular Redgrave Fen is important to local people for both wildlife and for recreation (as identified through RNP consultation). Policy RED8 (Protection of Natural Assets) states that *“The highest level of protection will be given to sites of international wildlife importance with development only permitted where the proposal is in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017”*. Furthermore, development likely to have an adverse effect on Redgrave and Lopham Fen will not be permitted unless criteria set out in Policy RED8 is met. Policy criteria includes demonstrating that *“residual harm, after all measures to prevent and adequately mitigate have been applied, will be adequately compensated for.”*
- 9.4 In terms of locally designated biodiversity sites, Redgrave Lake County Wildlife Site (CWS) is located at the southern extent of the Parish. RNP Policy RED8 (Protection of Natural Assets) seeks to reinforce higher level policy protections provided through the emerging Local Plan (Policy LP18: Biodiversity and

⁹ Place Services (2020) Redgrave Neighbourhood Plan Habitats Regulations Assessment (HRA): Screening Report – October 2020 [online] available at: <https://www.midsuffolk.gov.uk/assets/Neighbourhood-Planning/Redgrave-NP-HRA-Screening-Report-Oct20.pdf>

Geodiversity), requiring that *“Where development proposals cause damage to identified natural features, or designated sites such as County Wildlife Sites, wildlife corridors around the interruption will be constructed.”* Additionally, where development has the potential to impact upon a designated site, protected species or habitat, an *“ecological impact assessment (EclA) will be required to be submitted with the planning application to assess effects on flora and fauna, commensurate with the scale of the impact and the importance of the species.”*

- 9.5 The most prominent trees in Redgrave Parish are those within Redgrave Park, where there is a mixture of parkland and plantation. There is also a small area of woodland located within the conservation area which is valued locally. Further to the discussion above, Policy RED8 (Protection of Natural Assets) also requires that *“Proposals should retain existing features of landscape and biodiversity value (including ponds, trees, woodland, including ancient woodland, veteran trees, hedgerows including ancient field boundaries and verges)”*.
- 9.6 The RNP further recognises that patches of natural habitat, linear features, etc., can act as wildlife corridors within the parish; enabling the linking of habitats and reducing the isolation of populations. This is reflected through Policy RED8 (Protection of Natural Assets) which states that *“Development proposals will be expected to protect and enhance existing ecological networks and wildlife corridors such as the River Waveney and River Little Ouse and their associated habitats.”* Highlighting the growing importance of wildlife corridors is likely to lead to positive effects, ensuring that where possible opportunities are taken to *“create new natural habitats”* and *“plant additional trees and hedgerows”*.
- 9.7 The requirement for new development to *“provide a net gain in biodiversity”* is explored within Policy RED8, stating that *“All development should demonstrate how net gains for biodiversity are being secured as part of the development, proportionate to the scale of development and potential impacts (if any).”* This commitment to net-gain extends throughout the RNP policy framework, reflecting the importance of the natural environment to residents. Policy RED11 (The Design of New Development) states that proposals for new housing development should:
- “k) minimise the loss of trees and hedgerows to enable necessary road access and visibility splays;*
 - l) retain existing tree belts and hedgerows making a feature of them as part of the development*
 - m) include features to encourage and attract wildlife, create new habitats, provide a biodiversity net gain and enhance and extend existing wildlife corridors;”*
- 9.8 The protection of biodiversity features and support for net-gain and is anticipated to lead to positive effects in the long term, delivering measurable resilience to current and future pressures.
- 9.9 In terms of the site allocation at ‘Churchway’, while development would lead to loss of existing recreational open space, Policy RED2 (Housing Allocation) requires that mitigation be delivered *“in the form of a financial contribution to*

improving and enhancing overall open space and biodiversity provision on the remaining area of adjacent open space in accordance with the District Council's Open Space Standards." This may include *"establishment of community orchard and wildflower meadow in south eastern corner of the site to benefit wildlife and provide informal recreation."* It is considered that the mitigation proposed, along with higher level policy requirements, will likely avoid negative residual effects on biodiversity at the site. There is the potential for minor positive effects depending on the specific details of proposed enhancement measures.

- 9.10 Overall, it is considered that the requirement for biodiversity protection, enhancement, and net gain embedded through the RNP policy framework is predicted to have **uncertain minor long-term positive effects** for biodiversity.

Climate change

- 9.11 The climate change SEA objectives have a dual focus of reducing the contribution of the Neighbourhood Plan area to climate change and supporting resilience to the potential effects of climate change, particularly flooding. In practice, development plans can contribute to mitigating the effects of climate change by minimising greenhouse gas emissions from the built environment. Adapting to the effects of climate change includes ensuring development is directed away from areas at greatest risk of flooding and limiting effects of extreme weather.
- 9.12 In terms of adapting to climate change, the RNP performs well overall; focussing growth away from areas of fluvial flood risk. The majority of Redgrave Parish, particularly the existing built-up area of the village, lies within Flood Zone 1 and therefore has a low probability of flooding. However, there are significant areas at high risk of flooding (Flood Zone 3) located along the parish boundaries, particularly to the north, south and west; coinciding with the Little Ouse River and the River Waveney. Surface water flood risk is also an issue for the Parish in broadly similar locations.
- 9.13 In line with Policy RED16 (Drainage and Flooding) *"all development will be expected to demonstrate how it can mitigate its own flooding and drainage impacts, avoid increase of flooding elsewhere and seek to achieve lower than greenfield runoff rates"*. Furthermore, *"all new development to (including minor development) to use appropriate sustainable drainage systems (SuDS)."*
- 9.14 In terms of the site allocation, Policy RED2 (Housing Allocation) states that *"Any risks of surface water flooding will need to be addressed, the soil type is not compatible with infiltration type SuDs, and a surface feature such as a pond or wet area may be required."* This is further reiterated through Policy RED11 (The Design of New Development) which states that proposals for new housing development should *"include the use of SuDS wetland and water features to protect against pollution, provide drainage and wider amenity, recreational and biodiversity benefits."*
- 9.15 Well planned green infrastructure can help an area adapt to and manage the risks of climate change (including flood risk). Enabling and providing for green infrastructure within the Parish is therefore a key opportunity in which the Plan can help to promote climate change adaptation measures. Policy RED8 (Protection of Natural Assets), Policy RED9 (Protection of Local Green Space)

and Policy 11 (The Design of New Development) perform positively in this respect. Notably Policy RED8 sets out an expectation for development proposals to *“provide a net gain in biodiversity through, for example:*

a) the creation of new natural habitats.

b) the planting of additional trees and hedgerows and restoring and repairing fragmented biodiversity networks.”

9.16 In 2019, the Suffolk County Council Partnership's local authority members¹⁰ declared a ‘Climate Emergency’; and committed to aim to make Suffolk carbon neutral by 2030.¹¹ The RNP recognises the contribution that can be made locally towards reducing carbon emissions, and sets out a community objective *“to encourage low carbon initiatives and future sustainability”*. RNP Policy RED12 (Low Carbon and Future Sustainability) therefore states that *“Proposals that incorporate energy saving measures into new development which help to mitigate or offset climate change and minimise visual impact will be supported”*. Policy RED12 subsequently sets out support for a number of technologies, reinforcing higher level policy provisions within the emerging Joint Local Plan (Policy SP10: Climate Change), and the NPPF (2019). This includes passive solar gain, grey water recycling and rainwater capture, passive ventilation, and on-site energy generation from renewable sources such as solar panels.

9.17 Support for energy efficiency is further provided through Policy RED11 (The Design of New Development), which states that proposals for new housing development should *“Include features that allow for increased energy efficiency performance and renewable energy provision.”*

9.18 Provisions set out in Policy RED14 (Traffic and Highway Safety) and RED15 (Walking and Cycling) are likely to be effective at reducing emissions from transport; targeting local improvements that can support a modal shift and active travel opportunities. In this respect, there is little to add to the discussion presented below, under the ‘Transportation’ SEA theme. However, in terms of support for lower-emission vehicles (i.e. Electric Vehicles), it is noted that Policy RED12 (Low Carbon and Future Sustainability) sets out support for proposals that include *“electric vehicle charging points”*.

9.19 Overall, it is considered that the Neighbourhood Plan is likely to lead to **minor positive long-term effects** in relation to the climate change SEA theme. The Neighbourhood Plan seeks to deliver sustainably located growth; supports the uptake of active travel, reduced travel, and EV’s; and seeks to ensure development proposals contribute to Suffolk’s carbon neutral target through sustainable design and construction.

Landscape

9.20 Redgrave is located in the centre of the ‘South Norfolk and North Suffolk Claylands’ National Character Area (NCA), sat within a largely flat landscape with ancient woodlands. The landscape is a gently rolling heavy clay plateau with attractive small valleys. The character of Redgrave is largely in linear form

¹⁰ The Suffolk Climate Change Partnership (SCCP) consists of Suffolk County Council, West Suffolk, East Suffolk, Ipswich Borough Council, Babergh and Mid Suffolk District Council, and the Environment Agency

¹¹Babergh District Council and Mid Suffolk District Council (2021) Climate Change [online] available at: <https://www.babergh.gov.uk/environment/climate-change/>

along a typical Suffolk ‘street’ strung out along the road from the river crossing, south eastwards towards an adjoining, large, more diffuse area of settlement around Redgrave Green.

- 9.21 The Joint Babergh and Mid Suffolk Landscape Guidance identifies some key objectives and key design principles which can be used for the consideration of new development within this landscape type, which have been reflected through the RNP policy framework. Notably Policy RED11 (The Design of New Development) requires that new development *“ensure that the proposed heights of buildings are appropriate to the character of the area and do not impact upon the amenity of adjoining residents through overlooking.”*
- 9.22 The Mid Suffolk Local Plan identifies land to the south and east of the village as a Special Landscape Area (SLA), although the emerging Joint Local Plan does not propose to carry the SLA local landscape designations forward. However, the importance of this high-quality landscape in the Neighbourhood Plan area is recognised by residents, and therefore a new local designation, the Area of Local Landscape Sensitivity (ALLS) is proposed through the RNP. In line with Policy RED6 (Area of Local Landscape Sensitivity) development will only be supported within the ALLS where it:
- “a) conserves or enhances the special qualities of the landscape.*
- b) is designed and sited to be sympathetic to the scenic beauty of the landscape setting.”¹²*
- 9.23 Special qualities of the landscape are further protected through Policy RED7 (Protection of Important Public Local Views), which identifies a number of key views and vistas into and out of the village. These countryside views contribute to the rural character of the village, and are important to local residents, as identified through the Neighbourhood Plan consultation sessions. Notably, the linear nature of the built form of Redgrave lends itself to some long views within the conservation area.
- 9.24 In line with Policy RED7 *“Proposals for development within an important view or that would affect an important view, should ensure that they respect and take account of the view concerned. Developments which would have unacceptable adverse impacts on the landscape or character of the view or vista will not be supported.”* Requiring that key views are considered and respected by new development is anticipated to lead to positive effects in the long-term.
- 9.25 It is noted that while key views do not coincide with the proposed RNP site allocation, development does have the potential to impact upon local views and village setting, given the open nature of the site. In line with Policy RED2 (Housing Allocation) development at ‘Churchway’ will provide the *“Creation of 5m landscaping belt between the development and existing adjacent residential properties to the west of the site.”*
- 9.26 In terms of the wider Neighbourhood Plan area, Policy RED11 (The Design of New Development) states that *“The design of all new development should reflect Redgrave’s local distinctiveness and character and seek to enhance its quality.”* Policy RED11 (The Design of New Development) further states that proposals for new housing development should *“include soft well landscaped*

¹² As set out in the Joint Babergh Mid Suffolk Landscape Character Assessment August 2015

soft boundary edges and where adjacent to open countryside or edge of settlement include a minimum 5m landscape strip;” and *“retain existing tree belts and hedgerows making a feature of them as part of the development”*. This will likely lead to positive effects in the long term, ensuring important, sensitive aspects of the village are enhanced, conserved and/ or avoided through new development.

- 9.27 Green spaces can be viewed locally as equally as important as the landscape setting of an area. Such spaces are found within the built-up area that contribute to the character of a settlement. Three specific spaces within the village have been identified by local residents as essential to Redgrave and designated as Local Green Space through Policy RED9 (Protection of Local Green Space). In line with Policy RED9 *“Development adjacent to a Local Green Space, that would adversely impact upon its special qualities, will not be supported.”* This is anticipated to lead to positive effects in the long term, helping meet the community objective *“protect and maintain Redgrave’s rural village identity and ensure that new development respects its form and character”*.
- 9.28 Overall, it is considered that the Neighbourhood Plan policy framework provides a level of protection for valued features, views and open countryside within and surrounding Redgrave Parish. **Neutral effects** are therefore anticipated in relation to the Landscape SEA theme.

Historic environment

- 9.29 The parish of Redgrave has a rich history and a number of historic assets present, including 49 listed buildings (one Grade I and two Grade II*), over half of which lie within the Redgrave Conservation Area. In addition to the conservation area, a notable heritage feature of the parish is Redgrave Park. While there are three listed buildings within the parkland, the Park itself does not have any formal landscape designations or planning protections. However, Mid Suffolk’s heritage team have indicated it is considered to be a non-designated heritage asset in its own right.
- 9.30 The value attached to Redgrave’s historic assets by its residents is highlighted within the RNP questionnaire results, where 79% of respondents indicated that the protection offered by the conservation area designation was either important or essential. In line with Policy RED10 (Protecting Redgrave’s Heritage Assets) *“Proposals for new development that may affect the character, value or setting of Redgrave Park or the Conservation Area or other historic asset (including Non-Designated Heritage Assets) should be accompanied by sufficient information in the form of a Heritage Statement.”* Policy RED10 specifies that, *“As a minimum the Heritage Statement should identify the significance of the asset, including the contribution made by its setting, undertake an assessment of the impact of the proposal on the historic asset including the, the works proposed and any proposed mitigation.”*
- 9.31 The Redgrave Conservation Area Appraisal (2011), identified three important views/ vistas within the conservation area centred on The Knoll and the convergence of The Street, Hall Lane and Churchway. Three views looking towards The Knoll are identified as important to the character of the area and occupy a central position within the built-up area of the village. These views are

listed in Policy RED7 (Protection of Important Public Local Views), which states that *“Proposals for development within an important view or that would affect an important view, should ensure that they respect and take account of the view concerned.”* Policy RED10 (Protecting Redgrave’s Heritage Assets) reinforces this position, stating that the special character of the conservation area will be reinforced by *“Protecting the setting of the Conservation Area from development which affects it, including in relation to views into or out of the area.”*

- 9.32 Policies discussed above are anticipated to lead to long term positive effects overall, meeting Neighbourhood Plan objectives to *“protect and enhance Redgrave’s natural and historic assets”*.
- 9.33 In terms of the site allocation, it is recognised that the site is located in the setting of the Conservation Areas and Listed Buildings, with the potential for adverse effects. Policy RED2 (Housing Allocation) therefore requires that *“The layout should avoid the potential for harm to the character and appearance of the Conservation Area and Listed Buildings along Half Moon Lane, due to loss of some views towards these from Churchway, which allow appreciation of the Listed Buildings’ rural backdrop and the one-plot-deep development pattern.”*
- 9.34 The Historic Environment Record lists over 50 sites of archaeological interest in the parish of Redgrave, with the site allocation at Churchway being noteworthy in this respect. Policy RED2 states that *“The site lies in an area of potential for archaeological remains, on a historic route leading out from The Street towards the church. Therefore, a programme of archaeological work, with trial trenched evaluation in the first instance will need to be secured to inform a mitigation strategy. This evaluation should be commissioned ahead of submitting a planning application, to reduce unknowns.”* Understanding the significance of affected assets and the impact of the proposed development on that significance will enable potential impacts to be appropriately minimised and mitigated.
- 9.35 Policy RED2 further states that, *“given the wealth of historic assets (designated and non-designated) within Redgrave, early consultation with Suffolk County Council’s Archaeological Service is encouraged for advice on any proposals before they reach application stage.”* The policy provides support in avoiding adverse effects at an early stage.
- 9.36 It is clear from community consultation that design is an issue local residents feel strongly about. Rural qualities of the village important to maintain, particularly approaches to the centre of the village which are enhanced by soft road edges and grassed verges. Policy RED11 (The Design of New Development) therefore states that *“The design of all new development should reflect Redgrave’s local distinctiveness and character and seek to enhance its quality.”* Furthermore, *“All proposals for new development should respect the scale, materials and character of the existing and surrounding buildings in the area, reinforcing local development patterns, the form, scale, massing and character of adjacent properties where this provides a positive contribution.”*
- 9.37 Policy RED9 (Protection of Local Green Space) designates local green space in the village; one of which is ‘The Flat Iron’ which lies within the Conservation Area and is shown on the Historic Environment Record and historic maps as part of a former common. This space is considered to be valuable to the

community in its current undeveloped form, and its designation will protect the historic value and special qualities of the site from development, maintaining a high quality, distinctive public realm.

- 9.38 Overall, it is considered that the Neighbourhood Plan and its supporting evidence, alongside the higher-level policy suite, provides a robust framework for the protection and enhancement of the historic environment. **Neutral effects** are anticipated in relation to the Historic Environment SEA theme.

Land, soil and water resources

- 9.39 Development at the proposed site allocation will result in the loss of approximately 1ha of greenfield land, and minor long-term negative effects are anticipated in relation to land and soil resources as a result.
- 9.40 The precise soil quality of the site is unknown at this stage. Indicative data suggests that the majority of the Redgrave settlement (including the site allocation) is underlain by Grade 3 agricultural land. However, it is not known if this is Grade 3a, which is best and most versatile, or Grade 3b, which is not. Effects are therefore uncertain in terms of the potential for development to lead to loss of high-quality agricultural land. However, it is noted that predictive assessments¹³ indicate a low (less than 20%) likelihood of best and most versatile agricultural land in the immediate vicinity of the settlement area.
- 9.41 Supporting biodiversity and facilitating enhancements to green infrastructure provision in the Neighbourhood Plan area will likely improve the quality of land and water resources. This will promote the ability of natural processes to support soil and water quality. Key policies in this regard includes Policy RED8 (Protection of Natural Assets), Policy RED9 (Protection of Local Green Space) and Policy 11 (The Design of New Development).
- 9.42 It is considered that any issues surrounding water resources, including wastewater treatment, will be a matter for Essex and Suffolk Water (ESW) (part of the Northumbrian Water Group). The Water Resources Management Plan (WRMP) (2019) sets out how water supply and demand will be balanced over the next 25 years; ensuring adequate supply to homes whilst also protecting the environment.¹⁴ The Neighbourhood Plan policy framework supports specific design opportunities in this respect; notably Policy RED16 (Drainage and Flood Risk) states that, *“All new development (including minor development) is required to use appropriate sustainable drainage systems (SuDS), wetland and water features to protect against pollution”*.
- 9.43 Overall, **minor long-term negative effects** are considered an inevitable consequence of growth and the loss of greenfield and agricultural land. However, this does also reflect a lack of available brownfield alternatives in the Plan area.

¹³ Natural England (2017) Likelihood of Best and Most Versatile (BMV) Agricultural Land – Strategic scale map Eastern Region [online] available at: <http://publications.naturalengland.org.uk/category/5208993007403008>

¹⁴ Essex & Suffolk Water (2019) Final Water Resources Management Plan 2019 [online] available at: <https://www.nwg.co.uk/responsibility/environment/wrmp/current-wrmp-2015-2020/>

Population and communities

- 9.44 Policy RED1 (New Housing) sets out how the housing target for the plan area (24 new dwellings) will be met; through a combination of the existing commitment (16 dwellings) together with an allocation for up to eight dwellings at Churchway (Policy RED2 (Housing Allocation)).
- 9.45 The existing use of the proposed allocation site is part of a wider recreation area of 13 acres, consisting of sports pitches and is locally considered to be underused. The Mid Suffolk Open Space Assessment (2019) which supports the emerging Joint Local Plan indicates that Redgrave is well served in terms of recreational open space, with a surplus of this form of open space (+4.42 hectares). However, the assessment also concludes that there are slight shortfalls in other types of open space in the village, such as Allotments (-0.04), Amenity Space (-0.46) and Youth provision (-0.01).
- 9.46 It is recognised that developing a small area of this overall 13 acres (approximately 1 acre) for housing to meet locally identified housing needs, would result in a loss of existing (although notably surplus) recreational space provision. Policy RED2 (Housing Allocation) therefore states that *“Mitigation for the loss of existing recreational open space will be required in the form of a financial contribution to improving and enhancing overall open space and biodiversity provision on the remaining area of adjacent open space in accordance with the District Council’s Open Space Standards.”* This provision could include contributing towards open space shortfalls set out in the Open Space Assessment, with specific provision options listed in Policy RED2 (i.e. youth provision). This has the potential to lead to minor long-term positive effects in the long term; meeting local infrastructure needs in accordance with the NPPF (2019) and the emerging Local Plan (specifically Policy LP30 and the District Council’s Open Space Standards).
- 9.47 The remaining recreational area, including the current children’s and youth areas, is protected as a Local Green Space under Policy RED9 (Designating Local Green Space) and the Redgrave Activities Centre is identified as a Community Facility under Policy RED4 (Existing Community Facilities). These policy requirements seek to ensure that there is no net loss of community provision through the development of new homes at Churchway; supporting an overall net-gain.
- 9.48 In addition to overall housing numbers, the size, type and tenure of new housing is also a key issue for the local community. Policy RED2 (Housing Allocation) states that development at ‘Churchway’ will provide a *“Dwelling mix to meet identified village needs and to consist of bungalows and small units including affordable housing in accordance with Policy RED3 (Housing Type)”*. Further detail is subsequently provided through Policy RED3 which states that *“In line with the latest evidence of need, new developments should provide a broad range of homes suitable for first time buyers, families and older people.”*
- 9.49 In terms of meeting the need of specialist groups, consultation highlighted that more moderate size properties to meet local need are required, in particular bungalows for older residents wishing to downsize and release larger houses for families. Policy RED3 therefore states that *“support will be given for smaller 2 and 3 bedroomed homes that are adaptable (meaning built to optional M4(2) standards), in order to meet the needs of the ageing population, without*

excluding the needs of the younger buyers and families.” This is anticipated to lead to positive effects in the long term, meeting the community objective “To provide for housing that meets the needs of the local population and achieve a better balance of available housing.”

- 9.50 The community in Redgrave is a key asset for residents, enhancing their living experience, health and well-being. For a hinterland village with a community of 250 dwellings, Redgrave is rich in community and recreational facilities including amenities hall, public house, and a community shop. Development at ‘Churchway’ is well related to the existing built-up area of the village with good access to local facilities. Capitalising upon this accessibility, Policy RED2 (Housing Allocation) requires that new development at Churchway will provide a *“new footway on south side of Churchway, to link with the rest of the village.”* This is anticipated to lead to long term minor positive effects, supporting a connected, active community.
- 9.51 While the housing site allocation is sustainably located, in terms of the wider parish, in line with Policy RED5 (New or Improved Facilities) *“New housing development will only be permitted if it can be demonstrated that sufficient supporting infrastructure (physical, medical, educational, green and digital) is available to meet the needs of that development.”* This will ensure any new development is suitably integrated with the community, supporting sustainable growth in the long term.
- 9.52 There is strong community support to safeguard important village assets. Policy RED4 (Existing Community Facilities) therefore seeks to ensure that existing facilities are protected from development which may result in their loss, impact upon their viability or erode their value to the community. Where change of use is proposed, this will only be supported where *“an improved or equivalent facility can be located elsewhere in the parish in an equally convenient, safe and accessible location”*.
- 9.53 The sustainable growth and expansion of community facilities is also supported through the RNP. Policy RED5 (New or Improved Community Facilities) highlights that *“support is given by the community for maintaining, developing and improving the services and facilities offered in the village”*. Specifically, this includes *“the creation of a new or improved ‘Village Hall’ facility”*, recognising the community’s desire for either a new village hall or a revamped Activities centre.
- 9.54 There is no predominant employment sector in the parish; the largest business in Redgrave is Gressingham Foods, followed by Hall Farm Business Park situated on Churchway. Policy RED13 (New and Existing Business) sets out support for *“Proposals for the expansion of existing businesses at Redgrave Business Centre”*, provided listed criteria is met. Policy RED13 also sets out support for *“proposals for change of use”*, again under the caveat of certain criteria being met (see Policy RED13). The support for change of use reflects the current changing role of high streets in light of the ongoing Covid-19 pandemic, and high proportion of Redgrave residents working from home. Policy RED13 is anticipated to lead to long term positive effects, providing flexibility to accommodate changing local needs and ensure the sustainable growth of the village.

- 9.55 Given the rural nature of the village, Policy RED13 also provides support for *“new small scale businesses appropriate to a rural area, particularly those that result in the reuse of redundant or unused historic or farm buildings, and new buildings to accommodate new business or agricultural uses”*. Again, this support is provided where proposals meet established criteria, including that they *“do not have a significant adverse impact upon the character of the area, the amenity of residents or result in an unacceptable increase in traffic generation.”* This is anticipated to lead to minor positive effects in the long-term, supporting locally based businesses and workforce, farms, and small enterprises.
- 9.56 Overall it is considered that the RNP will lead to **significant long-term positive effects** in relation to the population and communities SEA theme. This is through the delivery of a range of new homes and a net-gain in community provision, to meet the needs of all sectors of the community; alongside the protection and enhancement of community infrastructure, local employment opportunities, and accessibility to services.

Health and wellbeing

- 9.57 Green spaces within the village, and access to the wider countryside are important to promote a healthy lifestyle and retain the rural setting of Redgrave Parish. Redgrave is well served by green space, with the village centred on a large green known as the Knoll, surrounded by thatched cottages. Given the contribution of green spaces to the village feel and setting, the RNP seeks to designate three important green sites as Local Green Space (Policy RED9). Proposed designations reflect the results of local questionnaire undertaken for the Neighbourhood Plan, which showed that 90% of respondents believed green spaces to be either ‘important’ or ‘essential’ to Redgrave. Notably, the Playing Field site is protected to reflect its recreational importance to the village; including an amenities centre, a car park, three sports fields, a children’s playground and open meadow. Policy RED9 (Protection of Local Green Spaces) will restrict development to that which is essential for each site, maintaining the important contributions made by the sites to the community and built environment.
- 9.58 As discussed above under the ‘Population and Communities’ theme above, new development at ‘Churchway’ will result in a loss of recreational open space, however there is currently a surplus of this form of open space within Redgrave (according to the Open Space Standards (2019)) and the loss can be compensated for. In line with Policy RED2 (Housing Allocation) development at the site will provide financial contributions to either improving the existing facilities or providing additional facilities e.g. children’s play area, sports pitches, provision for youth.
- 9.59 While the village is well served by community infrastructure, Policy RED5 (New or Improved Community Facilities) sets out support for new provision where it will improve the service offer of the village. Notably, Redgrave Activity Centre was identified in the Neighbourhood Plan Questionnaire as a valued and important facility but also one that would benefit from substantial upgrading or even replacing. Policy RED5 therefore sets out support for high quality, sustainable improvements to the centre, stating that *“Any new facility on the Redgrave Activities Centre site should provide safe and convenient access,*

sufficient parking (including cycle parking) and outside amenity green space for community use.”

- 9.60 In terms of supporting green infrastructure, supplementary to the policies discussed above, Policy RED8 (Protection of Natural Assets) and Policy RED11 (Design of New Development) are anticipated to lead to positive effects through setting a requirement for biodiversity net-gain. This will contribute positively towards ensuring the village’s wide range of natural habitats and green networks are maintained and enhanced for a variety of uses; including recreation and relaxation.
- 9.61 The importance of access to natural, green spaces, particularly given the ongoing Covid-19 pandemic, is further reiterated through Policy RED11 (The Design of New Development). Policy RED11 requires that proposals for new housing development should *“avoid overdevelopment by ensuring that a residential plot can accommodate the needs of modern dwellings with usable garden space”*. This is anticipated to contribute positively towards residents’ overall wellbeing; providing opportunities to experience nature and engage in physical activity while managing the impacts of lockdown and social distancing.
- 9.62 New development in Redgrave will also be required to be well connected, delivering improvements to the network of high-quality green infrastructure and Public Rights of Way (PRoW) network which connects to neighbouring villages. The rural surroundings are an important leisure asset with many opportunities for walking, cycling, horse riding and other outdoor pursuits. In line with Policy RED15 (Walking and Cycling), new development should seek to provide *“safe and attractive pedestrian and cycle links that connect to existing networks and allow for access to the wider countryside”*. Ensuring access to the surrounding countryside is considered to lead to positive effects overall, contributing to the villagers’ health and well-being in terms of both mental and physical health.
- 9.63 Overall, it is considered that the RNP is likely to have a **minor long-term positive effect** in relation to the health and wellbeing SEA theme; supporting sustainable growth of the community, delivering new housing and associated community infrastructure to meet local needs, and increasing connectivity with the countryside and green assets within and surrounding the village.

Transportation

- 9.64 Owing to its rural location and lack of public transport opportunities, Redgrave has a high level of car ownership, with many households now having a car for every member of the household over 18 years of age.¹⁵ This trend is considered likely to continue given Redgrave currently has no public transport that provides regular services to neighbouring centres for commuting or high street shopping. While it is noted that there is bus service connecting the parish with Diss and Bury St Edmunds, there are only four buses a day to Bury St Edmunds and four to Diss. Furthermore, there is only one bus stop in the village which further reduces uptake.
- 9.65 High car ownership currently places pressure on space, particularly given many of the village’s roads are narrow, congested, and unsafe in places due to heavy HGV use and peak time congestion. This was a key issue raised through RNP

¹⁵ Redgrave Parish Council (2020) Redgrave Neighbourhood Plan

community consultation; notably the Duck factory on Hinderclay Road travelling towards the A143 to reach Bury St Edmunds is an area of concern. This route draws traffic through the centre of the village via The Street and Hall Lane. Support is therefore given through Policy RED13 (New and Existing Business) to *“new small scale businesses”* only where proposals *“do not [...] result in an unacceptable increase in traffic generation.”*

- 9.66 Policy RED14 (Traffic and Highway Safety) sets out further detail in this respect, requiring that *“Development that would result in a significant impact upon the function or safety of the transport network should be effectively mitigated.”* Furthermore, *“Development impacts that cannot be mitigated and would result in an unacceptable increase in traffic generation or would be detrimental to highway safety will not be permitted.”*
- 9.67 In terms of active travel, the parish is relatively well served by footpaths including The Angles Way, a promoted long-distance trail between Thetford and Great Yarmouth, which lies across the north of the parish. Suffolk County Council’s Green Access Strategy (2020-2030) sets out the council’s commitment to enhance public rights of way, including new linkages and upgrading routes where there is a need. This commitment is reiterated through RNP Policy RED15 (Walking and Cycling) which seeks to protect and enhance Public Rights of Way. Policy RED15 states that *“All new developments should seek to improve levels of walking and cycling within the Neighbourhood Plan area through the provision of safe and attractive pedestrian and cycle links that connect to existing networks and allow for access to the wider countryside”*.
- 9.68 The RNP recognises the importance of sustainable travel uptake, with Policy RED14 (Traffic and Highway Safety) stating that *“Proposals should maximise opportunities for sustainable transport, prioritising these modes as far as possible.”* Specifically, in relation to the site allocation, Policy RED2 (Site Allocation) requires that new development at ‘Churchway’ will provide a *“new footway on south side of Churchway to link with rest of the village.”* Policy RED11 (The Design of New Development) also performs positively in this respect, stating that proposals for new housing development should *“accommodate parking consistent with the Suffolk Guidance for Parking 2019 or successor documents”* and *“integrate with the existing footway network and prioritise the movement of pedestrians and cyclists”*.
- 9.69 Furthermore, Policy RED5 (New or Improved Community Facilities), states that *“Any new facility on the Redgrave Activities Centre site should provide safe and convenient access, sufficient parking (including cycle parking) and outside amenity green space for community use.”*
- 9.70 Overall, while sustainable transport opportunities are limited and car reliance high, the RNP seeks to deliver new homes in a sustainable location, supporting active travel for local journeys and connected communities. Furthermore, the FNP framework is likely to ensure that new development in the village does not significantly impact on existing congestion, with the potential for localised improvements in the long term. **Neutral effects** are therefore concluded.

10. Conclusion and recommendations

Conclusions

- 10.1 Overall, the assessment has determined that the current version of the RNP is likely to lead to predominately positive effects. **Significant long-term positive effects** are anticipated in relation to population and communities and health and wellbeing through supporting sustainable growth of the community and healthy lifestyles. The RNP seeks to deliver housing to meet local needs; and ensures the type of housing being developed is likely to support the needs of all sectors of the local community. Further to this the RNP supports the vitality and viability of the village through the protection and enhancement of the high-quality public realm and valued green spaces, a net gain in community infrastructure that meets Redgrave's needs, and support for sustainable local economic growth.
- 10.2 **Minor positive effects** are predicted for biodiversity and climate change given the Neighbourhood Plan policy framework sets out a number of requirements which support local and national climate change objectives/targets. Notably the premise for biodiversity protection, enhancement, and net gain embedded through the Neighbourhood Plan policy framework will lead to positive effects directly and indirectly for biodiversity and climate change respectively. Minor positive effects are however 'uncertain' at this stage in relation to biodiversity and will be dependent on the specific details of proposed mitigation (i.e. level of financial contributions to improving and enhancing overall open space and biodiversity provision).
- 10.3 **Neutral effects** are anticipated in relation to the landscape and historic environment SEA themes. The RNP policy framework seeks to ensure growth in the parish protects and where possible enhances Redgrave's historic assets, landscape features and local villagescape; in addition to identified important local views.
- 10.4 **Neutral effects** are also anticipated in relation to the transportation theme. While sustainable transport opportunities in the village are limited and car reliance high, the RNP seeks to deliver new homes in a sustainable location, supporting active travel and connected communities.
- 10.5 **Minor negative effects** are predicted in relation to land, soil and water resources given the proposed site allocation will result in the loss of greenfield and agricultural land.

Cumulative effects

- 10.6 Cumulatively the RNP seeks to complement the provisions of the emerging Joint Local Plan by; allocating land to meet residual housing needs, seeking development proposals which contribute to the locally required mix of housing types and tenures, and supporting delivery of high-quality development which complements its setting, settlement form and village identity.
- 10.7 In terms of in-combination effects on biodiversity Habitat sites, the HRA screening states that *"although the Plan allocates sites for development, the parish does not lie within an evidenced Zone of Influence for recreational*

disturbance impacts on Habitats sites in combination with other plans and projects. There is therefore no requirement for any mitigation measures to be embedded in the Plan to avoid any likely significant effects. Monitoring of recreational disturbance impacts is not currently required but may be requested in the future from Norfolk LPAs from Mid Suffolk DC.”

10.8 Cumulative positive effects are therefore anticipated overall.

Recommendations

10.9 The first draft of the SEA Environmental Report shared with Redgrave Parish Council included the following recommendation:

10.10 The supporting policy text for Policy RED 10 states that, *“given the wealth of historic assets (designated and non-designated) within Redgrave, early consultation with Suffolk County Council’s Archaeological Service is encouraged for advice on any proposals before they reach application stage.”* To strengthen the RNP, it is recommended that this supporting text be moved into policy RED2. This would increase the weight of the requirement, avoiding adverse effects at an early stage through the implementation of neighbourhood planning policy.

10.11 This recommendation has been incorporated into the final submission version of the RNP.

Part 3: What are the next steps?

11. Next steps

11.1 This part of the report explains the next steps that will be taken as part of plan-making and SEA.

Plan finalisation

11.2 Following submission, the plan and supporting evidence will be published for further consultation, and then subjected to Independent Examination. At Independent Examination, the RNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

11.3 Assuming examination leads to a favourable outcome, the RNP will then be subject to a referendum, organised by Mid Suffolk District Council. If more than 50% of those who vote agree with the Plan, then it will be 'made'. Once 'made', the RNP will become part of the Development Plan for Mid Suffolk District, covering the defined Neighbourhood Plan Area.

Monitoring

11.4 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.

11.5 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by Mid Suffolk District Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the RNP that would warrant more stringent monitoring over and above that already undertaken by Mid Suffolk District Council.

Appendices

Appendix A Regulatory requirements

As discussed in **Chapter 1** above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. **Table AA.1** overleaf links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table AA.2** explains this interpretation. **Table AA.3** identifies how and where within the Environmental Report the regulatory requirements have/ will be met.

Table AA.1: Questions answered by this Environmental Report, in-line with an interpretation of regulatory requirements

Questions answered		As per regulations... the Environmental Report must include...	
Introduction	What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes 	
	What's the SEA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SEA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan 	
Part 2	What are the SEA findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan 	
Part 3	What happens next?	<ul style="list-style-type: none"> A description of the monitoring measures envisaged 	

Table AA.1: Questions answered by this Environmental Report, in-line with regulatory requirements

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	
(f) the likely significant effects 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;	The environmental characteristics of areas likely to be significantly affected	i.e. answer - <i>What's the scope of the SA?</i>
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Key environmental problems / issues and objectives that should be a focus of appraisal	i.e. answer - <i>What are the key issues & objectives?</i>
(i) a description of the measures envisaged concerning monitoring.	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach)	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Table AA.2: 'Checklist' of how (throughout the SEA process) and where (within this report) regulatory requirements have been, are and will be met.

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 ('What is the plan seeking to achieve') presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters have been considered in detail through scoping work, which has involved dedicated consultation on a Scoping Report. The 'SEA framework' – the outcome of scoping – is presented within Chapter 3 ('What is the scope of the SEA?'). More detailed messages, established through a context and baseline review are also presented in Appendix B of this Environmental Report.
3. The environmental characteristics of areas likely to be significantly affected;	
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The SEA framework is presented within Chapter 3 ('What is the scope of the SEA'). Also, Appendix B presents key messages from the context review. With regards to explaining " <i>how...considerations have been taken into account</i> ", Chapter 7 explains the Steering Group's 'reasons for supporting the preferred approach', i.e. explains how/ why the preferred approach is justified in light of alternatives appraisal.
6. The likely significant effects 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. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapter 6 presents alternatives appraisal findings (in relation to housing growth, which is a 'stand-out' plan policy area). Chapters 9 presents an appraisal of the plan. With regards to assessment methodology, Chapter 8 explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g. timescale.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The assessment seeks to highlight where certain tensions between competing objectives may exist, which might potentially be actioned by the Examiner, when finalising the plan. A specific recommendation is made in Chapter 10.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 4 and 5 deal with 'reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues and options. Also, Chapter 7 explains the Parish Council's 'reasons for selecting the preferred option' (in light of alternatives assessment).

Regulatory requirement**Discussion of how requirement is met**

9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 11 presents measures envisaged concerning monitoring.
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10. A non-technical summary of the information provided under the above headings	The NTS is provided at the beginning of this Environmental Report.
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The SA Report must be published alongside the Draft Plan, in accordance with the following regulations

authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	At the current time, this Environmental Report is published alongside the 'submission' version of the Redgrave Neighbourhood Plan, with a view to informing Regulation 16 consultation.
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The SA must be taken into account, alongside consultation responses, when finalising the plan.

The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	Assessment findings presented within this Environmental Report, and consultation responses received, have been fed back to the Steering Group and have informed plan finalisation.
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Appendix B Scoping information

This appendix presents the baseline information and policy review that has informed the identification of key issues and SEA objectives as presented in Chapter 3 of the Environmental Report.

It was established at scoping that for the purposes of this SEA, the air quality theme has been scoped out of the proposed framework.

Scoping consultation was undertaken during the period Monday 11th January to Monday 15th February 2021. The responses received are identified in **Table AB.1** below

Table AB.1 Scoping consultation responses

Scoping consultation response	SEA update/ response
Natural England	
Jacqui Salt, Consultations Team	
Natural England has no specific comments to make on this neighbourhood plan SEA scoping.	Thank you for taking the time to review and respond to scoping consultation.
Historic England	
Edward James, Historic Places Advisor, East of England	
Thank you for your email requesting a scoping opinion for the Redgrave Neighbourhood Plan SEA. We would refer you to the advice in Historic England Advice Note 8: <i>Sustainability Appraisal and Strategic Environmental Assessment</i> , which can be found here: https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/ This advice sets out the historic environment factors which need to be considered during the Strategic Environmental Assessment or Sustainability Appraisal process, and our recommendations for information you should include.	Thank you for taking the time to review and respond to scoping consultation. Advice Note 8 has been reviewed as part of the historic environment policy review.
We would also refer you to Historic England Advice Note 3: Site Allocations and Local Plans. This advice note sets out what we consider to be a robust process for assessing the potential impact of site allocations on any relevant heritage assets. In particular we would highlight the Site Selection Methodology set out on Page 5. This is similar to the methodology used to assess potential impacts on the setting of heritage assets (Good Practice Advice 3) but is focused specifically on the site allocation process, including but not limited to considerations of setting. We would expect a proportionate assessment based on this methodology to be undertaken for any site allocation where there was a potential impact, either positive or negative, on a heritage asset, and the SEA consequently to advise on how any harm should be minimised or mitigated. Advice Note 3 can be found here: https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/	Advice Note 3 has been reviewed as part of the historic environment policy review.
At Screening Stage, we considered that it was unlikely that 'Significant effects', in the context of the SEA process, would	Noted, with thanks.

Scoping consultation response

SEA update/ response

occur as a result of the neighbourhood plan. Nevertheless, we are pleased to note that the historic environment section of this plan is detailed, and particularly welcome the consideration of settlement form and morphology derived from the Redgrave Conservation Area Appraisal, as well as identification of important listed buildings.

We are concerned to note, however, that paragraphs 6.21 and 6.22 refer to the 'county sites and monuments record', and that the Scoping Report derives its information on below ground archaeological significance from the conservation area appraisal. CSMR have been known as Historic Environment Records for a number of years, and the text has been copied and pasted directly from page 7 of the conservation area appraisal, indicating a lack of analysis. This is not sufficient for an up to date assessment of archaeological potential and significance, and the SEA itself should make use of up-to-date information derived from the Suffolk Historic Environment Record, investigated by an appropriately qualified specialist. It is odd that this section should have been copied from out of date information when the SHER *has* been consulted to provide information regarding Local Designations.

The Conservation Area Appraisal quotation text has been amended and updated in the updated scoping information provided below. Despite the out of date reference in the quoted text, the Suffolk HER has already been consulted and the more updated findings from this have been made more prominent to the reader based on the outlined comment.

We note that 6.27 identifies potential for enhancement of heritage assets. However, there is no basis in the discussion above that supports there being an identified need for enhancement to the setting of any heritage assets, so we are unclear why this potential has been highlighted. Either this needs to be explored in more critical detail, or we would recommend that this be removed.

Noted, an update now clarifies the potential for positive effects through public realm and access improvements or opportunities to better reveal the significance of an asset.

We would suggest reviewing the suggested decision making criteria in paragraph 2.12 of our advice note 8, and considering whether any of the themes identified as examples could be additional questions asked during the SEA process. In particular, we would welcome a stronger emphasis on promoting local distinctiveness and on high quality design.

Noted, with thanks.

Historic England strongly advises that the conservation and archaeological staff of the relevant local planning 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), which should be consulted as part of the SEA process. In addition, they will be able to advise how any site 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.

Noted with thanks, the Suffolk HER has been considered through the SEA and plan-making has sought to include relevant stakeholders where appropriate.

To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the 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 SEA, these would have an adverse effect upon the environment.

Noted, with thanks.

Biodiversity

Policy context

The EU Biodiversity Strategy¹⁶ 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 Framework¹⁷ (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 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:
 - 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
 - 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.
 - Take a proactive approach to mitigating and adapting to climate change, considering the long-term implications for biodiversity.
- The presumption in favour of sustainable development does not apply where development requiring appropriate assessment because of its potential impact on a habitats site is being planned or determined.

The Natural Environment White Paper (NEWP)¹⁸ sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering

¹⁶ European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52011DC0244&from=EN> [accessed 07/12/18]

¹⁷ MHCLG (2019) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_w eb.pdf

¹⁸ HM Gov (2011) The Natural Choice: securing the value of nature [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228842/8082.pdf

communities and personal wellbeing. It was in part a response to the UK's failure to halt and reverse the decline of 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:

- Halve 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.

Biodiversity 2020: A strategy for England's wildlife and ecosystem services¹⁹ 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'.

The 25 Year Environment Plan²⁰ 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.

Mid Suffolk Core Strategy Policy CS5 (Mid Suffolk's Environment) and Babergh and Mid Suffolk Joint Local Plan policy SP09 (Enhancement and Management of the Environment) directly relate to the Biodiversity theme.

¹⁹ DEFRA (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf

²⁰ 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

Baseline information

European designated sites

The Neighbourhood Plan area is within the 5km Impact Risk Zone of the Waveney Valley Fens SAC and Redgrave & South Lopham Fens Ramsar site. The two European Sites fall partially within the Neighbourhood Plan area, to the north west. Taking each site in turn:

Waveney and Little Ouse Valley Fens Special Area of Conservation (SAC)

(192.37ha) occurs in the East Anglian centre of distribution of calcareous fens and contains very extensive great fen-sedge (*Cladium mariscus beds*), including managed examples, as well as stands in contact zones between small sedge mire and species-poor *Cladium beds*. The habitat type here occurs in a number of spring-fed valley fens in the headwaters of the Little Ouse and Waveney rivers.

Purple moor-grass – meadow thistle (*Molinia caerulea – Cirsium dissectum*) fen-meadows are associated with the spring-fed valley fen systems. The *Molinia* meadows occur in conjunction with black bog-rush – blunt-flowered rush (*Schoenus nigricans – Juncus subnodulosus*) mire and calcareous fens with great fen-sedge. Where the fen-meadow is grazed it is more species-rich, with frequent southern marsh-orchid *Dactylorhiza praetermissa*. is located in the north west part of the site. The following habitats²¹ are present within the SAC:

- Inland water bodies (Standing water, Running water) (10%)
- Bogs, Marshes, Water fringed vegetation, Fens (48.7%)
- Heath, Scrub, *Maquis* and *Garrigue*, *Phygrana* (10.9%)
- Dry grassland, Steppes (0.1%)
- Humid grassland, *Mesophile* grassland (14.8%)
- Improved grassland (0.1%)
- Broad-leaved deciduous woodland (15.4%)

The following two Annex I habitats²² are a primary reason for the designation of this site:

- *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*).
- Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae* (calcium-rich fen dominated by great fen sedge (saw sedge)).

Key vulnerabilities/ factors affecting site integrity include:²³

- Inappropriate Scrub Control;
- Inappropriate Water Levels;
- Air pollution – impact of atmospheric nitrogen deposition; and
- Water pollution.

²¹JNCC (2000): 'Waveney and Little Ouse Valley Fens' [online] available at: <https://sac.incc.gov.uk/site/UK0012882>

²² Ibid.

²³ Natural England (2015) Site Improvement Plan: Waveney and Little Ouse Valley Fens [online] available at: <http://publications.naturalengland.org.uk/publication/5465193064693760>

Redgrave & South Lopham Fens Ramsar site (127.09ha) is an excellent example of spring-fed lowland valley fen, exhibiting several distinct vegetation communities, supporting a diverse and well-studied invertebrate fauna. The site is one of only two British localities for the spider (*Dolomedes plantarius*). Intensive arable agriculture extends to the site boundary. There is a boardwalk and a network of footpaths for visitors. Part of the site exhibits a classic zonation of vegetation types, characteristic of valley mires. Dry marginal woodland is replaced by floristically-rich fen grassland, dominated by purple moor-grass (*Molinia caerulea*). This grades into a mixed fen vegetation community and areas dominated by reed and sedge, notably saw sedge (*Cladium mariscus*) in the valley bottom. Sandy ridges protrude into these zones and support damp, heathy vegetation. Most of the fen communities are prone to invasion by willow and locally this has developed into dense scrub and carr.²⁴

A Habitats Regulations Assessment (HRA) Screening Report has been produced for the RNP (October 2020).²⁵ This is to determine whether the draft RNP requires a 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. The HRA Screening Report concludes that *“the draft RNP is not predicted to have any Likely Significant Effect on any Habitats site, either alone or in combination with other plans and projects. The content of the modification draft Redgrave Neighbourhood Plan has therefore been screened out for any further assessment.”*

Nationally designated sites

Redgrave and Lopham Fens Site of Special Scientific Interest (SSSI) (127 ha) cover the same area as the Ramsar Site discussed above. Intersecting with the north east part of the Plan area, the site is designated for its Fen, Marsh and Swamp lowland habitat, which is of biological importance. The entirety of the site is in an unfavourable (but recovering) condition²⁶. The Redgrave and Lopham Fens SSSI contains over 270 plant species. Additionally, a number of invertebrates are present on site. Plant and animal species (invertebrates) are listed below:

- *Juncus subnodulosus* mire
- *Sphagnum compactum* wet heath
- *Cirsium palustre* fen meadow
- *Cirsium dissectum* fen meadow
- Population of Schedule 5 spider - Fen Raft Spider
- *Cladium mariscus* swamp and sedge-beds
- *Peucedanum palustris* tall-herb fen
- *Eupatorium cannabinum* tall-herb fen

The Redgrave and Lopham Fens are also designated as a National Nature Reserve (NNR).

Locally designated sites

²⁴ JNCC (2007): 'Information on Ramsar Wetlands' [online] available at:

<https://rsis.ramsar.org/RISapp/files/RISrep/GB513RIS.pdf>

²⁵ Place Services (2020) Redgrave Neighbourhood Plan Habitats Regulations Assessment (HRA): Screening Report – October 2020

²⁶ Natural England (1985): 'Redgrave and Lopham Fens SSSI' [online] available at:

<https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s1003726>

County Wildlife Sites (CWS) play a key role in the conservation of Suffolk's biodiversity. Suffolk has over 900 CWSs, amounting to around 11,000 hectares and covering almost 3% of the county. The CWS designation is non-statutory, but it recognises the high value of a site for wildlife. Redgrave Lake CWS is located in the south of the parish.

The Redgrave and Lopham Fens is designated as a Local Wildlife Site (LWS), due to its' ecological benefit to local residents through a variety of plant and animal species, which provide recreational value.

Also, the Little Ouse Headwaters Project (LOHP) was set up in 2002 by local residents to promote conservation and enjoyment of the fenland habitats bordering the upper reaches of the Little Ouse River. Work is currently being undertaken to ensure the maintenance of a continuous corridor of wildlife habitat along the headwaters of the Little Ouse. Awards have already been achieved such as the Suffolk Greenest Community Award and 'Re-building Biodiversity' award.²⁷

Biodiversity Action Plan Priority Habitats (BAPs)

The Priority Habitats are depicted in **Figure 3.1**. Notably, there are multiple areas of Deciduous Woodland distributed throughout the parish, predominately to the north and south of the parish, coinciding with Redgrave & South Lopham Fens to the north, and 'The Shrubbery' area of woodland to the south of the main settlement. It is noted that the Steering Group are currently exploring if much of this deciduous woodland can be added to the Ancient Woodland directory with evidence that it predates 1600.

Future baseline

Habitats and species will potentially face increasing pressures from future development within the 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, with the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.

County and Local Wildlife Sites often act as wildlife corridors and have the potential to be impacted by new development which can remove the connection between habitats for species such as birds. Ecological sites can also be impacted by poor air quality and water quality, and factors such as noise and lighting can disturb vulnerable species.

However, the draft Plan also presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species and designated sites at an early stage of planning for future growth. To maintain and improve the condition of biodiversity in the future, it will be important to not only protect priority habitats but to enhance the connections between them; utilising opportunities for net-gain where possible. It will be crucial to effectively coordinate the delivery of housing, employment and infrastructure to ensure that opportunities to improve green infrastructure and ecological corridors are maximised, both within the Plan area and in the surrounding areas.

²⁷ Redgrave Parish Council (2020): 'Redgrave Neighbourhood Plan – Draft for Consultation' [online] available at: <https://redgraveneighbourhoodplan.files.wordpress.com/2020/09/rnp-pre-submission-draft-reg14-compressed.pdf>

Climate change

Policy context

Key messages from the National Planning Policy Framework²⁸ (NPPF) include:

- 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.
- Inappropriate development in areas at high risk of flooding should be avoided by directing development away from areas of highest risk (whether existing or future).
- Strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources.
- Plans should take account of the effects of climate change in the long term, considering a range of factors including flooding. Adopt proactive strategies to adaptation and manage risks through adaptation measures including well planned green infrastructure.
- Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbate the impacts of physical changes to the coast.

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.

The Flood and Water Management Act (2010)²⁹ sets out measures to ensure that risk from all sources of flooding, not just rivers and seas, are managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; roll back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

²⁸ MHCLG (2019) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

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

The UK Climate Change Act³⁰ 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:

- Commits the UK government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050. This includes reducing emissions from the devolved administrations (Scotland, Wales and Northern Ireland), which currently account for about 20% of the UK's emissions. The 100% target was based on advice from the CCC's 2019 report, '*Net Zero – The UK's contribution to stopping global warming*' and introduced into law through the Climate Change Act 2008 (2050 Target Amendment) Order 2019.
- 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 Act requires the Government to assess the risks and opportunities from climate change for the UK, and to prepare for them. The Committee on Climate Change's Adaptation Sub-Committee advises on these climate change risks and assesses progress towards tackling them. The associated 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.

The Committee of Climate Change published a 2012 report entitled 'How Local Authorities Can Reduce Emissions and Manage Climate Change Risk'³¹ which emphasises the crucial role councils have in helping the UK meet its carbon targets and preparing for the impacts of climate change. It outlines specific opportunities for reducing emissions and highlights good practice examples from local authorities.

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 report³² containing six priority risk areas requiring additional action in the next five years:

- Flooding and coastal change risks to communities, businesses and infrastructure;

³⁰ HM Government (2008): 'Climate Change Act 2008' [online] available at:

<http://www.legislation.gov.uk/ukpga/2008/27/contents>

³¹ CCC (2012) 'How local authorities can reduce emissions and manage climate risks' [online] available at:

<https://www.theccc.org.uk/publication/how-local-authorities-can-reduce-emissions-and-manage-climate-risks/>

³² DEFRA (2017) 'UK Climate Change Risk Assessment Report January 2017' [online] available at:

<https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017>

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

The Clean Air Strategy³³ released in 2019 sets out the Government plans for dealing with all sources of air pollution. The strategy sets out proposals in detail and indicates how devolved administrations intend to make their share of emissions reductions, and complements the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan.

The Committee of Climate Change published a 2012 report entitled ‘How Local Authorities Can Reduce Emissions and Manage Climate Change Risk’³⁴ which emphasises the crucial role councils have in helping the UK meet its carbon targets and preparing for the impacts of climate change. It outlines specific opportunities for reducing emissions and highlights good practice examples from Local Authorities.

Department for Transport (2020) Decarbonising Transport: Setting the Challenge (2020)³⁵ sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050.

In February 2020, the government announced a new £5 billion 5-year funding package to overhaul bus and cycle links for every region outside London.³⁶ This builds on the Government’s determination to make buses work better for their passengers. The details of these programmes will be announced in the upcoming National Bus Strategy, to be published later in 2020, and follows the allocation of £170 million to support more electric buses, increase rural mobility and trial new ‘Superbus’ services.

Cycle routes will also see a major boost across the country with over 250 miles of new, high-quality separated cycle routes and safe junctions in towns and cities to be constructed across England, as part of the multibillion pound package announced.

The Suffolk Climate Action Plan sets out the ambition to continue working towards a target of reducing carbon emissions by 60% by 2025, alongside strategies for a “credible pathway” for doing so.³⁷

³³ HM Gov (2019) Clean Air Strategy 2019 [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf

³⁴ CCC (2012) ‘How local authorities can reduce emissions and manage climate risks’ [online] available at: <https://www.theccc.org.uk/publication/how-local-authorities-can-reduce-emissions-and-manage-climate-risks/>

³⁵ Department for Transport (2020) Decarbonising Transport: Setting the Challenge [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/876251/decarbonising-transport-setting-the-challenge.pdf

³⁶ Department for Transport (2020) Major boost for bus services as PM outlines new vision for local transport [online] available at: <https://www.gov.uk/government/news/major-boost-for-bus-services-as-pm-outlines-new-vision-for-local-transport>

³⁷ Suffolk Climate Action Plan, available at: <http://www.greensuffolk.org/assets/Greenest-County/SCCP/Climate-Change/Suffolk-Climate-Action-Plan-2-FINAL.pdf>

Mid Suffolk Core Strategy Policy CS4 (Adapting to Climate Change) and Policy SP10 (Climate Change) of the Babergh and Mid Suffolk Joint Local Plan directly relates to the Climate change theme.

Baseline information

Climate change mitigation

Reducing greenhouse gas (GhG) emissions is widely acknowledged as a key element of climate change mitigation. CO₂ emissions in particular are associated with a changing climate and will become an area of even greater focus for mitigating climate change following Mid Suffolk District Council's declaration of a climate emergency in July 2019. The Council also pledged to set up a Task Force examine ways in which Babergh & Mid Suffolk Councils will respond to the climate change challenge on a spend to save basis, with the ambition to make Babergh & Mid Suffolk Councils carbon neutral by 2030.³⁸

CO₂ emissions from the built environment are monitored and recorded at Local Authority level.³⁹ **Figure AB.1** shows that CO₂ emissions for Mid Suffolk have steadily declined over the period of 2006- 2018, in line with regional and national statistics. Data also shows that Mid Suffolk has slightly higher emissions per capita than the East or England as a whole.

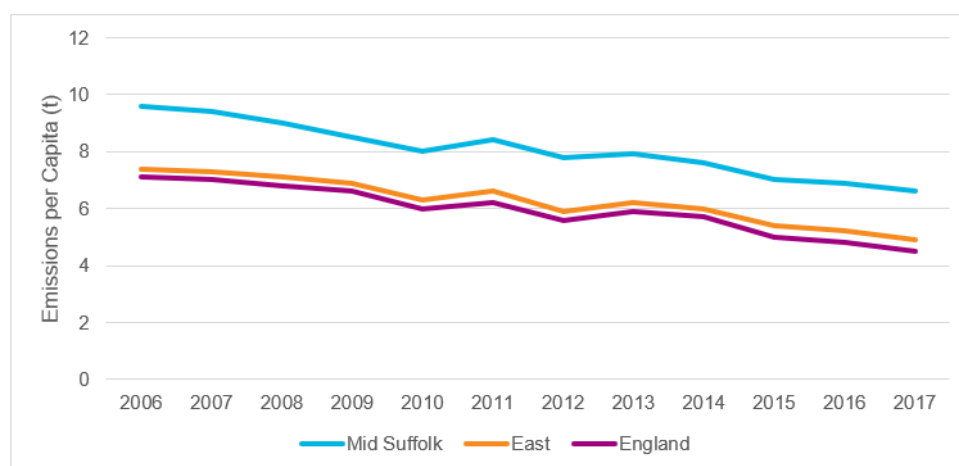


Figure AB.0.1 Carbon dioxide emissions per capita 2006 - 2018

In terms of emissions by sector, as shown in **Figure AB.2** (below) the largest contributing sector of CO₂ emissions in Mid Suffolk in 2018 was the transport sector (46.2% of total). This has been the case since 2012. Prior to 2012 industry and commercial totals were slightly greater than totals for the transport sector.

³⁸ ClimateEmergency (2019) Declare a Climate Emergency – Full list of Councils [online] available at: <https://www.climateemergency.uk/blog/list-of-councils/>

³⁹ Department of Energy and Climate Change (2011) 2005 to 2018 UK local and regional CO₂ emissions: Per capital local CO₂ emissions estimates; industry, domestic, and transport sectors [online] available at: <https://www.gov.uk/government/statistics/local-authority-emissions-estimates>

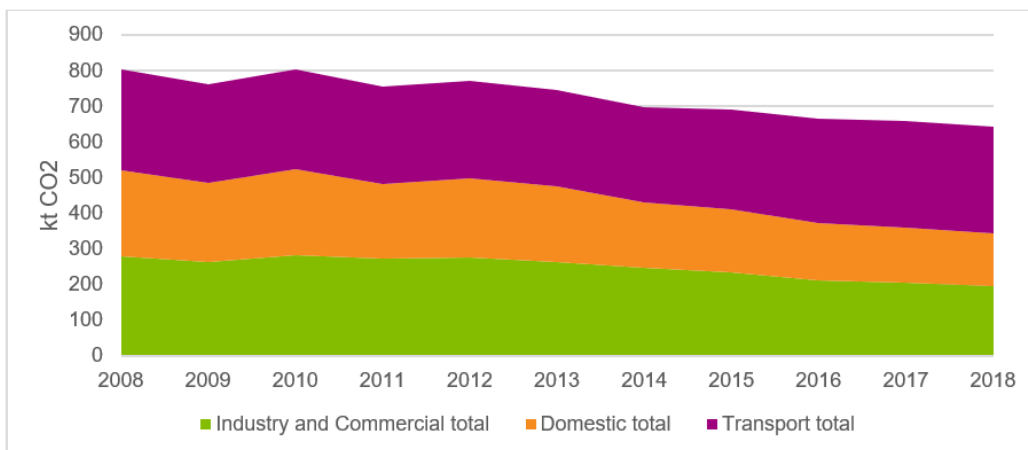


Figure AB.0.2 Mid Suffolk CO₂ emissions (kt) per sector (2005- 2018)⁴⁰

Within Suffolk County, almost all transport emissions come from road transport, with a small proportion coming from diesel railways. Of all road transport emissions, the majority is from activity on A roads with a smaller proportion originating from activity on minor roads.⁴¹ Emissions can be further broken down into the districts within Suffolk. As shown in **Figure AB.3** below, transport emissions for Babergh and Mid Suffolk are significantly higher than that of Ipswich and East Suffolk, and lower than that of West Suffolk.⁴²

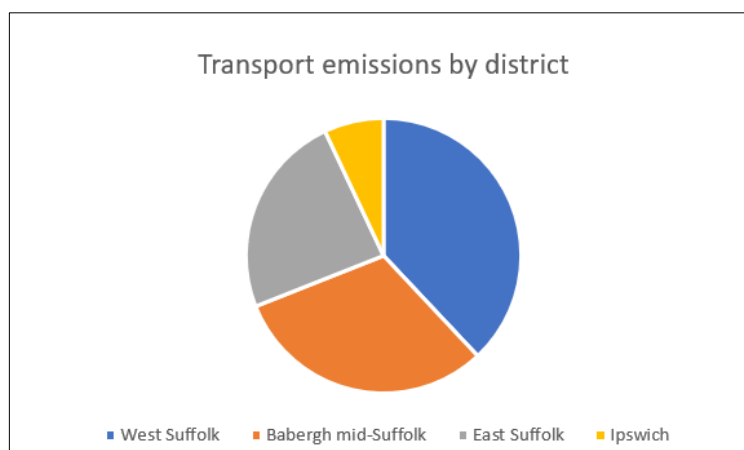


Figure AB.0.3 Suffolk transport emissions by district⁴³

Mid Suffolk District, and Redgrave Parish specifically, have high car ownership levels and a large proportion of the population commute by car (see the transportation SEA theme). This is largely explained by Redgrave’s geography; the rural location of parish and the lack of sustainable public transport.

It is considered that the uptake of Ultra Low Emission Vehicles (ULEVs) will contribute positively towards the reduction of road transport related emissions. In line with assumptions made by the Department for Transport’s ‘Road to Zero’ report (2018), it is assumed that ULEV uptake will increase rapidly in the coming decade

⁴⁰ Ibid.

⁴¹ Ricardo Energy & Environment (2020) Suffolk Climate Emergency Plan Technical Report [online] available at: <http://www.greensuffolk.org/assets/Greenest-County/SCCP/SCCP/Misc/2020-06-01-REE-SCEP-Technical-Report-FINAL.pdf>

⁴² Ricardo Energy & Environment (2020) Suffolk Climate Emergency Plan Technical Report [online] available at: <http://www.greensuffolk.org/assets/Greenest-County/SCCP/SCCP/Misc/2020-06-01-REE-SCEP-Technical-Report-FINAL.pdf>

⁴³ Ibid.

and therefore aside from HGVs, all vehicles could be ultra-low emission (powered either by hydrogen or electricity) by 2030.⁴⁴

Electric vehicles (EVs) do not burn fuel and create almost no noise. They are battery powered and have the potential to be 'zero-emission vehicles' (ZEVs) if powered by renewable electricity. As of May 2020, 0.16% of vehicles in Suffolk County are fully electric and there are 120 charging points across the County.

In terms of the Neighbourhood Plan area, **Figure AB.4** (overleaf) shows EV charge points in relatively close proximity to Redgrave parish; including in Diss, Scole and Eye. While not shown on **Figure AB.4**, it is noted that a greater number of charging points present in larger centres such as Bury St Edmunds and Thetford; located south west and north west of the draft Plan area respectively.

The Suffolk Climate Emergency Plan (2020) sets out "Encouraging greater take-up of public transport and active travel (walking and cycling) and a massive roll-out of zero emissions vehicles" as a key priority for local action.⁴⁵

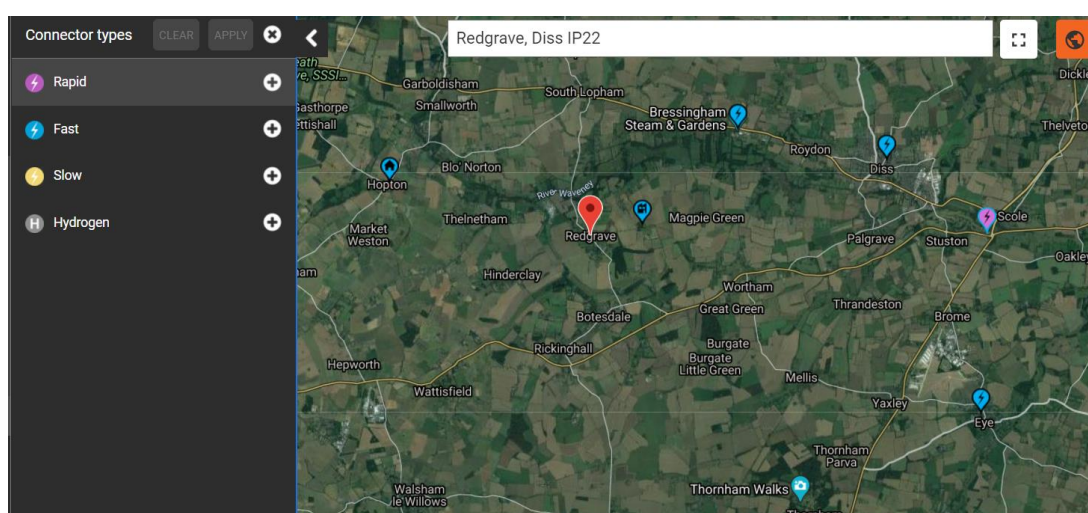


Figure AB.0.4 EV charge points⁴⁶

Renewable energy

The Department for Business, Energy and Industrial Strategy publishes annual statistics on renewable energy generation, disaggregated by Local Authority. The most recently published data is for 2019 and shows that Mid Suffolk has a total renewable energy installed capacity of 91.9 megawatts (see **Table AB.2** below). Renewable energy generation has increased in Mid Suffolk between 2014 and 2019 by 16% over a range of sectors. This includes anaerobic digestion, onshore wind, and photo-voltaics (PV) (i.e. solar panels).

Table AB.2 Renewable energy installed capacity (MW) in the Mid Suffolk district (2014- 2019)⁴⁷

⁴⁴ Department for Transport (2018) The Road to Zero [online] available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf

⁴⁵ Ricardo Energy & Environment (2020) Suffolk Climate Emergency Plan Technical Report [online] available at:

<http://www.greensuffolk.org/assets/Greenest-County/SCCP/SCCP/Misc/2020-06-01-REE-SCEP-Technical-Report-FINAL.pdf>

⁴⁶ Zapmap (2020) Zap Map [online] available at: <https://www.zap-map.com/live/>

⁴⁷ DBEIS (2018), Regional Renewable Statistics [online] available at: <https://www.gov.uk/government/statistics/regional-renewable-statistics>

	Photo-voltatics	Onshore Wind	Hydro	Anaerobic Digestion	Offshore Wind	Wave /Tidal	Sewerage Gas	Landfill Gas	Municipal Solid	Animal Biomass	Plant biomass	Cofiring	Total
2014	26.0		-	0.5	-	-	-	6.3			-	-	
		12.3							20.0	14.3			79.3
2019	32.1		-	1.6	-	-	-	6.3			-	-	
		12.4							25.2	14.3			91.9

Climate change adaptation

Research on the probable effects of climate change in the UK was released in 2018 by the UK Climate Projections (UKCP18) team. UKCP18 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 in a 'medium emissions' scenario are likely to be as follows:

- An increase in winter mean temperature of 2.2°C and an increase in summer mean temperature of 2.8°C; and
- A change in winter mean precipitation greater than +10% and summer mean precipitation greater than -10%.

Resulting from these changes, a range of risks may exist for the Neighbourhood Plan area, including:

- Effects on water resources from climate change
- Reduction in availability of groundwater for extraction
- 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

Flood risk

Figure AB.5 below shows that the majority of Redgrave Parish, particularly the existing built up area of the village, lies within Flood Zone 1 and therefore has a low probability of flooding. However there are significant areas of Flood Zone 3 located along the parish boundaries, particularly to the north, south and west; coinciding with the Little Ouse River and the River Waveney.

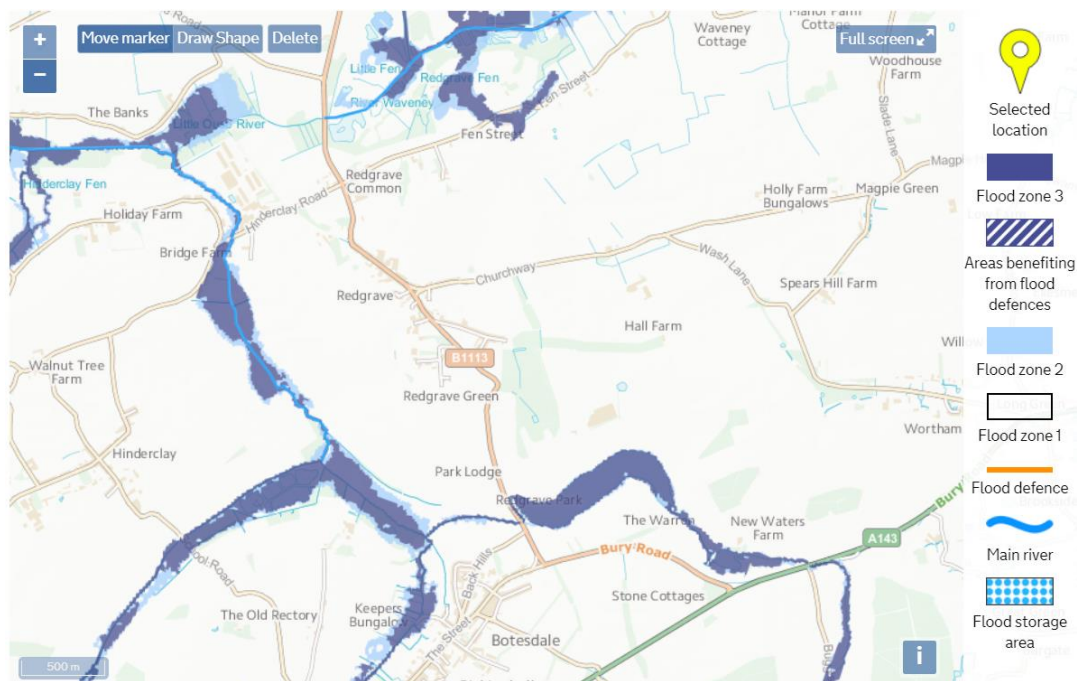


Figure AB.0.5 Fluvial flood risk⁴⁸

With regards to surface water flood risk, **Figure AB.6** overleaf identifies the areas at highest risk of surface water flooding. Areas of the highest risk are similar to that seen for fluvial flood risk in **Figure AB.5** above.



⁴⁸ Environment Agency (2020) Flood Map for Planning [online] available at: <https://flood-map-for-planning.service.gov.uk/>

Figure AB.0.6 Surface water flood risk⁴⁹

Future baseline

In line with UK trends and national commitments, emissions are likely to continue to fall as energy efficiency measures, renewable energy take-up and new technologies, such as EVs and solar PV, become more widely adopted. Notably, the Government has consulted on changes to England's Building Regulations introducing a 'Future Homes Standard' and the Department for Transport recently published 'Decarbonising Transport; setting the challenge' a first step towards publishing a full transport decarbonisation plan.⁵⁰

In the future, new development could have the potential to increase flood risk through factors such as changing surface and ground water flows, overloading existing inputs to the drainage and wastewater networks or increasing the number of residents exposed to areas of existing flood risk. It is further recognised that climate change has the potential to increase the occurrence of extreme weather events such as enhanced precipitation, which can increase surface water runoff in and around the parish. This has the potential to put residents, property and development at a high risk of flood exposure; although it is recognised that high flood risk areas are distant from the built settlement.

Furthermore, in line with the NPPF (2019), sequential testing is likely to ensure that development within areas at highest risk of flooding is largely avoided, and development is likely to deliver mitigation such as Sustainable Drainage Systems (SuDS).

Landscape

Policy context

Key messages from the National Planning Policy Framework⁵¹ (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).

⁴⁹ Environment Agency (2020) Flood Map for Planning [online] available at: <https://flood-map-for-planning.service.gov.uk/>

⁵⁰ Department for Transport (2020) Decarbonising Transport: Setting the Challenge [online] available at: <https://www.gov.uk/government/publications/creating-the-transport-decarbonisation-plan>

⁵¹ MHCLG (2019) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

- 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;
 - 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
 - remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
- The government attaches great importance to Green Belts, whose fundamental aim is to prevent urban sprawl by keeping land permanently open. The general extent of Green Belts is established and can only be altered in exceptional circumstances through preparation or review of a Local Plan.

The national design guide (2019)⁵² sets out the characteristics of well-designed places and demonstrates what good design means in practice. It is based on national planning policy, practice guidance and objectives for good design as set out in the National Planning Policy Framework. Specific, detailed and measurable criteria for good design are most appropriately set out at the local level.

National Character Area (NCA) profiles are published by Natural England and divide England in 159 distinct natural areas based on their landscape, biodiversity, geodiversity, historic, cultural and economic characteristics.⁵³ NCAs follow natural features in the landscape and are not aligned with administrative boundaries. NCA profiles describe the features which shape each of these landscapes, providing a broad context to its character.

The Government's 25 Year Environment Plan⁵⁴ states the intention to work with relevant authorities to deliver environmental enhancements within all 159 NCAs across England. Along with the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes', Goal 6 'Enhanced beauty, heritage and engagement with the natural environment' of the Government's "A Green Future: Our 25 Year Plan to Improve the Environment" directly relates to the Landscape.

The Suffolk Landscape Character Assessment (2011) identifies landscape typologies across the County at a highly localised scale.⁵⁵

The Joint Babergh and Mid Suffolk Landscape Character Guidance (2015) provides further evidence of local landscape sensitivities and identifies key character features at a settlement-specific scale.⁵⁶

⁵² MHCLG (2019) National Design Guide [online] available at: <https://www.gov.uk/government/publications/national-design-guide>

⁵³ Natural England (2012) 'National Character Area profiles' [online] <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁵⁴ HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

⁵⁵ Suffolk County Council (2011), 'Suffolk Landscape Character Assessment' [online], available from: http://www.suffolklandscape.org.uk/landscape_typology.aspx

⁵⁶ Babergh District Council (2015), 'Joint Babergh and Mid Suffolk Landscape Guidance' [online], available from: <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Joint-Landscape-Guidance-Aug-2015.pdf>

Mid Suffolk Core Strategy Policy CS 5 (Environment) and Policy LP18 (Landscape) of the Babergh and Mid Suffolk Joint Local Plan directly relates to the Landscape theme.

Baseline information

Local landscape character

Redgrave parish is located within the ‘**South Norfolk and High Suffolk Claylands’ National Character Area (NCA)**.⁵⁷ This NCA occupies a large area of central East Anglia stretching from just below Norwich in the north down to the River Gipping in the south. The area is bounded to the north by Mid Norfolk and The Broads NCAs and to the east by the sandy heathland of the Suffolk Coast and Heaths NCA. To the west the landscape merges into the drier and more open character of The Brecks NCA and to the south it meets the South Suffolk and North Essex Clayland NCA with its noticeably more undulating topography. Redgrave is relatively centrally located within the NCA.

The Joint Babergh and Mid Suffolk District Council Landscape Guidance (2015) provides further in-depth assessment of the particular character and qualities of landscape areas. The Landscape Guidance has divided the district into nine landscape typologies for Babergh and twelve landscape typologies for Mid Suffolk as identified in the Suffolk County Council Landscape Character Assessment (2008).⁵⁸ The Joint Guidance identifies Redgrave as falling within the ‘**Ancient Plateau Claylands**’.⁵⁹

The landscape is a gently rolling heavy clay plateau with ancient woodlands. On the north side of the Gipping Valley the character sweeps up in an arc on the north-east edge of the central clay plateau and westwards from Creting St Peter and Stowupland through to Haughley, Elmswell, Walsham-le-Willows, crossing the district boundary into St. Edmundsbury and then eastward to Wattisfield, Wortham, Mellis, Burgate and the western side of Eye in the Dove Valley.

The top of the plateau is generally flat or only gently undulating, with attractive small valleys. Towards the edges it is more dissected with greater more complex slopes. Land cover is predominantly arable farmland retaining much of the older field patterns of irregular partitions along with numerous areas of pasture land with substantial blocks of woodland and established hedgerows. Some areas have experienced large losses of hedgerow due to changing agricultural practices resulting in the creation of open arable “prairie” landscapes. There are occasional landscape parks within this Landscape type such as at Redgrave, Thornham Magna and Stowlangtoft. Unlike the Plateau Clayland landscape blocks of ancient woodland are visibly present in the landscape.

The Joint Landscape Guidance identifies some key objectives and key design principles which can be used for the consideration of new development within this landscape type. These are:⁶⁰

⁵⁷ Natural England (2014) NCA Profile: 83 South Norfolk and High Suffolk Claylands (NE544) [online] available at: <http://publications.naturalengland.org.uk/publication/6106120561098752>

⁵⁸ Suffolk County Council (2008) Suffolk County Council Landscape Character Assessment [online] available at: <https://suffolklandscape.org.uk/>

⁵⁹ Babergh and Mid Suffolk District Councils (2015) Joint Babergh and Mid Suffolk District Council Landscape Guidance [online] available at: <https://www.babergh.gov.uk/assets/DM-Planning-Uploads/Joint-Landscape-Guidance-Aug-2015.pdf>

⁶⁰ Babergh and Mid Suffolk District Councils (2015) Joint Babergh and Mid Suffolk District Council Landscape Guidance [online] available at: <https://www.babergh.gov.uk/assets/DM-Planning-Uploads/Joint-Landscape-Guidance-Aug-2015.pdf>

- To maintain and enhance the landscape areas and settlement pattern, ensuring the sense of separation between settlements is maintained where appropriate.
- To reinforce and enhance the existing field boundaries.
- To safeguard the plantation and ancient woodland areas.
- To safeguard the parkland areas.

Key design principles:

- This is quite open landscape with the potential of any form of development to be visibly intrusive if it has been designed without sufficient screening or an appropriate landscape design plan.
- Reinforce and enhance parkland features in new developments where appropriate.
- Ancient woodlands and old existing hedge lines are to be protected and maintained within this landscape character.
- To maintain the character and condition of the landscape. Any major developments will enter into a Section 106 Legal Agreement for landscaping.

Special Landscape Area (SLA)

A **Special Landscape Area (SLA)** is a local landscape designation identified in the 1980's, reflecting attractive combinations of landscape elements.

Land to the south and east of village has been designated as a SLA since the first Mid Suffolk Local Plan was adopted in 2008 (see **Figure 5.2**). The SLA comprises a river valley with traditional grazing meadows and the area of Redgrave Park.

There is currently uncertainty about the prospect of the SLA being retained in the Joint Local Plan, given that the latest iteration (Regulation 19 publication version) does not retain the designation and instead moves to a character-based approach. However, the importance of this high-quality landscape is recognised by local residents and therefore a new local designation, the Area of Local Landscape Sensitivity (ALLS) is being proposed through the draft RNP. This ALLS designation does not seek to prevent development from taking place but instead seeks to ensure that development within the area should be designed to be in harmony with the special characteristics of the area and follows the broad design objectives and principles referred to above.

Important local views

Redgrave parish residents have identified and the Steering Group is current reviewing eleven Important Public Local Views into and out of the village. These views (listed below and set out in **Figure AB.7**) are identified as contributing to the landscape setting of the village, and will be protected through the draft RNP:

1. View approaching the village from the north, along The Street looking south.
2. View from the footpath leaving Fen Street from the entrance to Redgrave & Lopham Fen to Churchway, looking southeast.
3. View from same footpath looking east towards St Mary's Church.
4. View along Churchway looking east towards St. Mary's Church.
5. View from the Playing Field looking east towards Hall Farm.

6. View from B1113 leaving Redgrave towards the south, looking towards Botesdale.
7. View from the footpath leaving Green Farm looking west towards Hinderclay.
8. View across “Norman’s Field” public footpath looking west.
9. View from stile at north-west corner of “Norma’s Field” looking west.
10. View from footpath on west of village looking west towards Hinderclay Farm.
11. View from footpath on west of village looking towards Hinderclay Church.

Figure AB.7 Redgrave Parish - Important Public Local Views (and Local Green Spaces)













Proposed Local Green Space (See Policy RED9)



Important View identified in Redgrave Neighbourhood Plan Public Forums

Each view is further shown in **Table AB.3** overleaf.

Table AB.3 Important views identified in Redgrave Neighbourhood Plan Public Forums

<p>1</p> 	<p>2</p> 	<p>3</p> 
<p>4</p> 	<p>5</p> 	<p>6</p> 
<p>7</p> 	<p>8</p> 	<p>9</p> 
<p>10</p> 	<p>11</p> 	

Future baseline

New development, including infrastructure development, has the potential to lead to incremental changes in landscape quality in and around the Neighbourhood Plan area. In the absence of the Neighbourhood Plan more speculative development may come forward within the open countryside or countryside setting, which could place increased pressure on local settings. This may negatively impact upon the landscape features which contribute to the distinctive character, in particular the previously designated SLA, and forthcoming ALLQ.

However, locally distinctive landscape features, characteristics and special qualities can be protected, managed and enhanced through the Neighbourhood Plan. New development that is appropriately designed/ masterplanned, and landscape-led, has the potential to support the area's inherent landscape character and quality. This may, for example, include regeneration and brownfield development that improves the village setting, delivering green infrastructure improvements, and enhanced framing of key views set out above.

Historic environment

Policy context

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

- 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.

These messages are supported by the national Planning Practice Guidance (PPG)⁶¹ which itself includes the key message that local authorities should set out in their Local Plans a positive strategy for the conservation and enjoyment of the historic environment which recognises that conservation is not a passive exercise and that identifies specific opportunities for the conservation and enhancement of heritage assets.

The national design guide (2019)⁶² sets out the characteristics of well-designed places and demonstrates what good design means in practice. It is based on national planning policy, practice guidance and objectives for good design as set out in the National Planning Policy Framework. Specific, detailed and measurable criteria for good design are most appropriately set out at the local level.

⁶¹ Ministry of Housing, Communities and Local Government (2016), Planning Practice Guidance [online], available from: <https://www.gov.uk/government/collections/planning-practice-guidance>

⁶² MHCLG (2019) National Design Guide [online] available at: <https://www.gov.uk/government/publications/national-design-guide>

Along with the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes', Goal 6 'Enhanced beauty, heritage and engagement with the natural environment' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment'⁶³ directly relates to the Historic Environment.

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 2019)⁶⁴ outlines ways to manage change that conserves and enhances historic areas in order to positively contribute to sustainable development and provides information on the relationship with local and neighbourhood plans and policies. Principally, the advice note emphasises the importance of:

- 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.
- Clearly identifying those issues that threaten the area's character or appearance and that merit the introduction of management measures.

Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA): Historic England Advice Note 8 (December 2016)⁶⁵ 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 (2nd Edition) (December 2017)⁶⁶ 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: Assess the degree to which these settings contribute to the significance of the heritage asset(s) or allow significance to be appreciated;

⁶³ HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online]

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

⁶⁴ Historic England (2019): 'Conservation Area Designation, Appraisal and Management: Advice Note 1' [online] available from: <https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/>

⁶⁵ Historic England (2016): 'SA and SEA: Advice Note 8' [online] available at: <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

⁶⁶ Historic England (2017): 'Setting of Heritage Assets: 2nd Edition' [online] available at: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

- 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)⁶⁷ outlines the importance of considering the historic environment whilst preparing the plan (section 1), which culminates in a checklist of relevant 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.

Mid Suffolk Core Strategy Policy CS5 (Mid Suffolk's Environment) and Policy LP19 (Historic Environment) of the Babergh and Mid Suffolk Joint Local Plan directly relate to the Historic Environment theme.

Baseline information

Designated heritage assets

Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent. In the Neighbourhood Plan area there are 49 listed buildings, over half of which lie within the Redgrave Conservation Area.

The Church of St Mary the Virgin (**Figure AB.8**) is Grade I listed and is unusually remotely sited from the village and now redundant.



Figure AB.8 Grade I Listed Church of St Mary the Virgin

There are two buildings that warrant Grade II* listing, one of them also remote in the form of Folly Lodge (**Figure AB.9**), a former keeper's lodge in the wooded grounds of the former Redgrave Hall. The other Grade II* building is the Pink House on The Street, originally a house and shop but now all one dwelling, it is of late C15th construction with a plastered timber frame and a thatched roof (**Figure AB.10**).

⁶⁷ Historic England (2018): 'Neighbourhood Planning and the Historic Environment' [online] available at: <https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/>



Figure AB.9 Grade II* Listed Folly Lodge

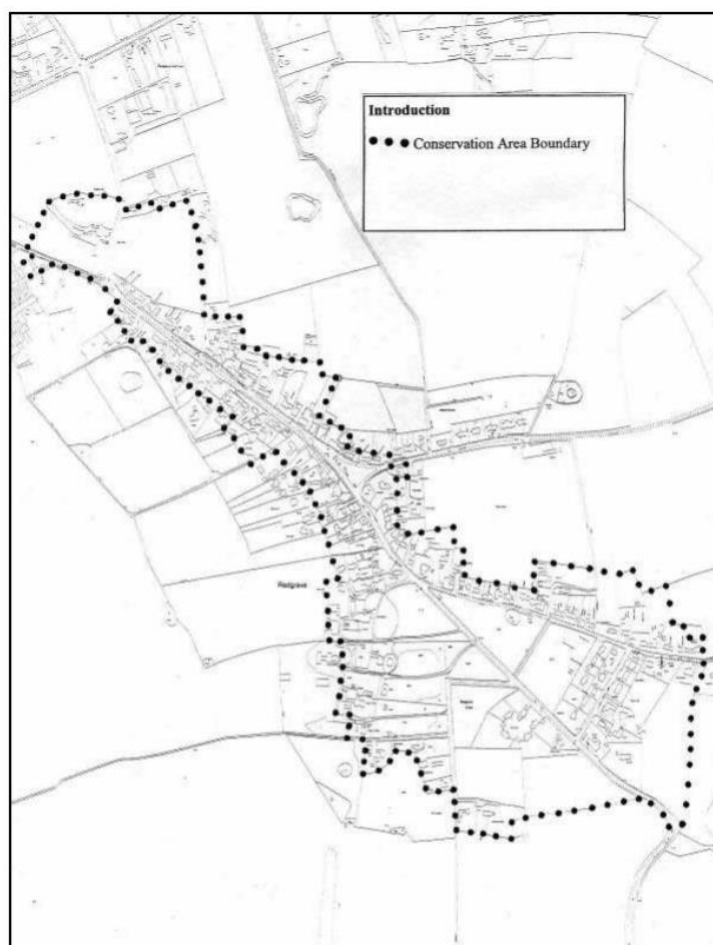


Figure AB.10 Grade II* Listed Pink House on The Street

The remaining listed buildings are Grade II, predominantly domestic in scale, a few having former commercial uses, and mostly timber-framed and plastered with pantile or thatched roofs.

Redgrave Conservation Area

The historic core of the built-up area of the village was designated as a Conservation Area by East Suffolk County Council in 1973 (**Figure AB.11**).

Figure AB.11 Redgrave Conservation Area

Mid Suffolk produced an Appraisal for the Conservation Area in 2011.⁶⁸ The Conservation Area Appraisal provides details on the entire built settlement, and includes The Street, Half Moon Lane, Hall Lane and Redgrave Green. Key information from the Conservation Area Appraisal has been set out below.

Settlement form and green features

The settlement at Redgrave is basically linear in form, a typical Suffolk ‘street’ strung out along the road from the river crossing south-eastwards towards an adjoining larger more diffuse area of settlement around Redgrave Green. Although a green by name there is no public open space here, but rather enclosed grazing land. On the eastern side there are good views across fields towards the scattered houses. The western part of Redgrave Green is more secluded with private unmade roads serving a scatter of dwellings amongst mature trees.

Redgrave Green adjoins Redgrave Park, where the Hall once stood set amongst the dense woodland of plantations along with some more open parkland. Along the road to the north-west, just north of Redgrave Green, a smaller publicly accessible triangular green (The Knoll) and a pond adjoin the junction where Church Way sets off to the east towards the church, some three quarters of a mile distant. This green has the village sign and is at the heart of the settlement with both the Cross Keys pub and a former Methodist Chapel close by.

⁶⁸ Mid Suffolk District Council (2011) Redgrave Conservation Area Appraisal [online] available at: <https://www.babergh.gov.uk/assets/Conservation-Area-Appraisals/Redgrave2011CAA.pdf>

Settlement pattern and the open countryside

The settlement pattern in Redgrave, with houses clustered around the green and along the approach road from the northwest is mostly one plot deep. This means that, although not often visible, the countryside is never far away. The road pattern immediately through the village is aligned north-west to southeast with the roads fanning out at either end. Also at either end there are designations of Special Landscape Area, to the north the Waveney valley, to the south Redgrave Park. Although there are no roads, in the immediate vicinity of the centre of the village there are footpaths, which fill in and connect up to the hinterland.

Branching off Church Way east of the village, footpaths 5 and 8 give access to the area to the north-east, within which can be found further footpaths 9, 10 and 11. South-west of the village, access is gained via footpaths 15 and 19 from the south, 21 and 1 in the centre and footpaths 2 and 25 from the northern end. The modern route through the village and over the Waveney has now superseded an earlier road network comprising Fen Street parallel to the river across the north of the village, with three green lanes off it to the south, Southern Lane (footpath 20), Mill Lane (5) and Bier Lane (11).

Archaeological significance

The Conservation Area Appraisal highlights that historically the Suffolk County Sites and Monuments Record listed over 50 sites of archaeological interest in the parish of Redgrave.⁶⁹ More recent evidence obtained from the Suffolk Historic Environment Record (HER)⁷⁰ identifies 90 monument records which lie either wholly or partially within the Plan area. These comprise of; second world war, saxon and tudor coins and flints, neolithic, mesolithic, medieval and bronze-age findspots, traces of prehistoric occupation, medieval and bronze age coins, and 13-14th century pottery.

The earliest of the dated finds include some Mesolithic flint flakes and a quartzite macehead. From the later Neolithic there are polished flint axes, a flint knife and part of a flint arrowhead. There appear to be no Bronze Age finds, but a couple of tumulus sites of unknown date may belong here. The Iron Age has left us part of a sandstone quern and some black Belgic pottery and an early gold coin, along with a settlement site either side of Bier Lane north of the Church. Roman remains include potsherds, some brooch fragments and several coins.

In their turn the Saxons have left a cinerary urn and further brooch fragments. Medieval sites listed include the parish churchyard and a former deer park plus various metalwork and pottery finds. There is also some Post Medieval interest, represented by the sites of a windmill, the bridge over the Waveney and various buildings associated with Redgrave Park. Overall we see a rich tapestry of remains, indicating that Redgrave has long been a centre of human activity. Redgrave has only one mention in the Domesday survey of 1086. It was held by St Edmund's and had a church with 30 acres of free land and sufficient woodland for 120 pigs.

Heritage at risk

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

⁶⁹ Mid Suffolk District Council (2011) Redgrave Conservation Area Appraisal [online] available at: <https://www.babergh.gov.uk/assets/Conservation-Area-Appraisals/Redgrave2011CAA.pdf>

⁷⁰ Suffolk County Council (2020) Suffolk Heritage Explorer [online] available at: <https://heritage.suffolk.gov.uk/search>

sites and conservation areas deemed to be 'at risk'. Currently there is no heritage at risk identified within the RNP area.

Future baseline

Key village viewpoints set out under the landscape SEA theme are potentially susceptible to insensitive design and layout from the development of new housing, employment and infrastructure which may affect historic landscapes and historic landscape features. Designated and undesignated heritage assets within the Plan area have the potential to receive notable harm from development due to insensitive design, layout or massing.

However, there is also the potential for future development to provide beneficial enhancement of heritage assets or their settings within the Plan area, particularly through public realm and access improvements or opportunities to better reveal the significance of an asset.

Land, soil and water resources

Policy context

Key messages from the National Planning Policy Framework⁷¹ (NPPF) include:

- 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.
 - 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

⁷¹ MHCLG (2019) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

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.
- Ensure that, wherever possible, development helps to improve local environmental conditions including water quality, taking into account relevant information such as river basin management plans.

Since July 2017 the Government’s Planning Practice Guidance (PPG) requires Local Planning Authorities to publish a Brownfield Land Register, and review it at least once a year, in order to identify all previously developed sites with potential for delivering new development. This is to help achieve maximum planning value and efficiency from available land, whilst avoiding unnecessary land take at greenfield sites.⁷² Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.⁷³

The Government’s 25 Year Environment Plan was published in 2018 and presents the ‘goals for improving the environment within a generation and leaving it in a better state than we found it’.⁷⁴ The implementation of this plan aims to achieve clean air, clean and plentiful water, reduced risk from environmental hazards, and managed exposure to chemicals. Specific policies and actions relating to environmental quality include:

- Improving soil health and restoring and protecting our peatlands;
- Respecting nature in how we use water;
- Reducing pollution; and
- Maximising resource efficiency and minimising environmental impacts at end of life.

Safeguarding our Soils: A strategy for England⁷⁵ sets out a vision for soil use in England which includes better protection for agricultural soils, protecting stores of soil carbon, improving the resilience of soils to climate change and preventing soil pollution. The essential message in relation to development is that pressure on soils is likely to increase in line with development pressure and the planning system should seek to mitigate this.

The Water Framework Directive⁷⁶ (2000) requires a management plan to be prepared for water catchment areas to inform planning and help meet objectives and obligations in areas such as water efficiency and sustainable drainage.

⁷² MHCLG (2017) Guidance: Brownfield Land Registers [online] available at: <https://www.gov.uk/guidance/brownfield-land-registers>

⁷³ Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

⁷⁴ DEFRA (2018) 25 Year Environment Plan [online] available at: <https://www.gov.uk/government/publications/25-year-environment-plan>

⁷⁵ DEFRA (2009) Safeguarding our Soils: A strategy for England [online] available at: <https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>

⁷⁶ Directive 2000/60/EC of the European Parliament and of the Council establishing a framework for the Community action in the field of water policy.

The Water White Paper 2011⁷⁷ 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.

The Government's Water Strategy for England⁷⁸ (2008) provides strategy for the water sector up until 2030, which aims to sustainably deliver secure water supplies and an improved and protected water environment. It sets out actions within the following areas:

- Water demand;
- Water supply;
- Water quality;
- Surface water drainage;
- River and coastal flooding;
- Greenhouse gas emissions;
- Charging for water; and
- Regulatory framework, competition and innovation.

Water for life⁷⁹ (2011) 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.

The National Waste Management Plan⁸⁰ provides an analysis of the current waste management situation in England and evaluates how it will support the implementation of the objectives and provisions of the revised Waste Framework Directive⁸¹. This includes an assessment of the need for new collection schemes, additional waste infrastructure and investment channels, as well as providing general or strategic waste management policies.

The EU Nitrates Directive (91/676/EEC) requires member states to identify areas where groundwater has nitrate concentrations of more than 50 mg/l nitrate or is thought to be at risk of nitrate contamination. These areas are designated as Nitrate Vulnerable Zones (NVZs) and as such are recognised as being at risk from agricultural nitrate pollution. Member states are required to establish Action Programmes in order to reduce and prevent further nitrate contamination.

The Essex & Suffolk Water (ESW) Water Resource Management Plan (WRMP) (2019)⁸² covers the next 40 years from 2020 to 2060 and was prepared in line with the Water Resources Management Plan Regulations 2007 and Water Resources Management Plan Direction 2017. The plan forecasts how much water will be

⁷⁷ Defra (2011) Water for life (The Water White Paper) [online] available at: <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>

⁷⁸ Defra (2011) Future Water: the Government's Water Strategy for England [online] available at:

<https://www.gov.uk/government/publications/future-water-the-government-s-water-strategy-for-england>

⁷⁹ Defra (2011) Water for life [online] available at: <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>

⁸⁰ DEFRA (2013) Waste Management Plan for England [online] available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf

⁸¹ Directive 2008/98/EC

⁸² Essex & Suffolk Water (2019) Final Water Resources Management Plan 2019 [online] available at:

<https://www.nwg.co.uk/responsibility/environment/wrmp/current-wrmp-2015-2020/>

available to supply customers, taking account of future droughts, climate change and the need to protect the environment. The plan also forecasts how much water customers will need taking account of future population growth. Comparing supply and demand forecasts through the plan ensures that reliable and sufficient supplies of water meet customer demand over the planning period.

Mid Suffolk Core Strategy Policy CS5 (Mid Suffolk's Environment) and the emerging Joint Local Plan provides Policy LP17 (Environmental Protection) which directly relates to this theme. In Whilst in some cases meeting wider objectives will necessitate the loss of agricultural land, particularly considering the relatively limited amount of brownfield land available for development in the Districts, Policy LP17 seeks to ensure that loss of agricultural land is a consideration.

Baseline information

Soil resources

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 (BMV) and Grades 3b to 5 are of poorer quality.

In this regard, provisional datasets indicate that the Plan area is formed of a mixture of Grades 2, 3 and 4 agricultural land. Additionally, based on the results of the 'Predictive BMV Land Assessment', the area immediately surrounding the settlement has a 'low' likelihood with a less than 20% likelihood of containing BMV land. Beyond the immediate surrounds however this changes to a 'high' likelihood with a greater than 60% likelihood of containing BMV land.

The Parish is predominantly underlain by slightly acid loamy and clayey soils with impeded drainage, and freely draining slightly acid sandy soils. There is also a band of loamy and sandy soils with naturally high groundwater and a peaty surface to the west of the settlement.⁸³

Mineral resources

The Suffolk Minerals and Waste Local Plan (SMWLP)⁸⁴ identifies that besides indigenous land-won sand and gravel, the supply of aggregates to Suffolk is made up from sand and gravel imported from surrounding counties, imported crushed rock, marine dredged sand and gravel, and indigenous and imported recycled construction, demolition and excavation waste. The SMWLP allocates nine sites for the extraction of sand and gravel; none of which fall within the Plan area. However, the entire Neighbourhood Plan area lies within a Minerals Consultation Area.

Water quality

The Plan area falls across two Anglian Management Catchments; Broadland Rivers and Cam and Ely Ouse. Waveney River (upstream Frenze Beck) is the main waterbody flowing north of the settlement area in Broadland Rivers Management Catchment. The 2019 classification for the River identifies a 'moderate' ecological status but failed chemical status.⁸⁵ Reasons for not achieving good status (RNAGs)

⁸³ DEFRA Magic Map Application [online] available at: <https://magic.defra.gov.uk/magicmap.aspx>

⁸⁴ Suffolk County Council (2020) Suffolk Minerals and Waste Local Plan [online] available at: <https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/suffolk-minerals-and-waste-development-scheme/>

⁸⁵ Environment Agency (2020) Catchment Data Explorer [online] available at: <https://environment.data.gov.uk/catchment-planning/WaterBody/GB105036040890>

are identified as dissolved oxygen as a result of natural drought (with no sector responsible).

Within Cam and Ely Ouse Management Catchment, the Little Ouse River (upstream Thelnetham) is the main waterbody flowing west of the settlement area. The 2019 classification for the River identifies a 'bad' ecological status and a failed chemical status. RNAGs include point source pollution, physical modification and flow effects as a result of groundwater and surface water abstraction, as well as land drainage.

Redgrave also lies within a Zone III (Total Catchment) Source Protection Zone. Source Protection Zones show how the risk of contamination from any activities that might cause pollution in the area. The Zones are used in conjunction with the Environment Agency's Groundwater Protection Policy to set up pollution prevention measures in areas which are at higher risk, and to monitor the activities of potential polluters nearby.

Nitrate Vulnerable Zones (NVZs) denote areas at risk from agricultural nitrate pollution.⁸⁶ Much of the east of England is a Nitrate Vulnerable Zone (NVZ), including the whole Neighbourhood Plan area for both surface water and groundwater. However, the uses being proposed through the Redgrave Neighbourhood Plan (housing and potentially open space) is not considered likely to significantly affect this designation.

Water resources

Mid-Suffolk District is served by Essex and Suffolk Water (ESW) (part of the Northumbrian Water Group). The Environment Agency have published a document entitled 'Areas of Water Stress: final classification' which included a map of England, identifying areas of relative water stress. The whole of ESW's supply area is shown as an area of 'Serious' water stress, based upon the amount of water available per person both now and in the future.⁸⁷

Within their Water Resource Management Plans (WRMPs) water companies refer to their Water Resource Zones (WRZs). A WRZ is the largest possible zone in which all resources, including external transfers, can be shared and hence the zone in which all customers experience the same risk of supply failure from a resource failure. Redgrave lies within the Hartismere WRZ at its western boundary.⁸⁸ Having prepared water demand and supply forecasts for a 40-year plan period (from 2020 to 2060), the WRMP identifies that Hartismere WRZ will remain in supply surplus, with sufficient water to meet demand during a severe drought and no need to develop new water resources.

Future baseline

Future development has the potential to affect water quality through increased consumption, diffuse pollution, waste-water discharges, water run-off, and modification. It is considered that ESW will seek to address any water supply and wastewater management issues over the plan period in line with the WRMP 2019; and the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality within the Plan area and wider area.

⁸⁶ Environment Agency and Defra (2018) Nitrate Vulnerable Zones [online] available at:

<https://www.gov.uk/government/collections/nitrate-vulnerable-zones>

⁸⁷ Environment Agency (date unknown) Areas of water stress: final classification [online] available at:

<https://www.iow.gov.uk/azservices/documents/2782-FE1-Areas-of-Water-Stress.pdf>

⁸⁸ Essex & Suffolk Water (2019) Final Water Resources Management Plan 2019 [online] available at:

<https://www.nwg.co.uk/responsibility/environment/wrmp/current-wrmp-2015-2020/>

However, it will be important for new development to avoid impacts on water quality and to contribute to reducing consumption and improving efficiency.

There are significant areas of potentially BMV agricultural land in the Neighbourhood Plan area. Future development within the Neighbourhood Plan area could therefore lead to the loss of high-quality soil resources.

Population and communities

Policy context

Key messages from the National Planning Policy Framework⁸⁹ (NPPF) include that planning policies should:

- Provide the social, recreational and cultural facilities and services the community needs, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship, whilst guarding against the unnecessary loss of community facilities and services.
- Retain and develop accessible local services and community facilities in rural areas.
- 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.
- Enable and support healthy lifestyles through provision of green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
- Ensure 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'.

National Planning Practice Guidance (NPPG)⁹⁰ identifies that:

- Local Planning Authorities should assess their development needs working with the other local authorities in the relevant housing market area or functional economic market area in line with the duty to cooperate. This is because such needs are rarely constrained precisely by local authority administrative boundaries.
- Local planning authorities should secure design quality through the policies adopted in their local plans. Good design is indivisible from good planning and should be at the heart of the plan making process.
- A healthy community is a good place to grow up and grow old in. It is one which supports healthy behaviors and supports reductions in health inequalities. It should enhance the physical and mental health of the community.

⁸⁹ MHCLG (2019) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

⁹⁰ Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

- Green infrastructure is a network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. Local Plans should identify the strategic location of existing and proposed green infrastructure networks. Where appropriate, supplementary planning documents can set out how the planning, design and management components of the green infrastructure strategy for the area will be delivered.

The Select Committee on Public Service and Demographic Change report *Ready for Ageing?* (2013)⁹¹ warns that society is underprepared for the ageing population. The report says 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 says that the housing market is delivering much less specialist housing for older people than is needed. Central and local government, housing associations and house builders need urgently to plan how to ensure that the housing needs of the older population are better addressed and to give as much priority to promoting an adequate market and social housing for older people as is given to housing for younger people.

The Babergh & Mid Suffolk District Councils Joint Homelessness Reduction and Rough Sleeping Strategy Homelessness Strategy 2019-2024 sets out the homelessness strategy in the area⁹². The strategy presents six key priorities with associated actions to enable the delivery of the Councils’ shared vision for the service over the next five years.

The Babergh & Mid Suffolk District Councils Communities Strategy 2019-2036 sets out the goal of developing “resilient and connected” communities. The strategy guides interventions for building closer relationships across a wide range of communities.

A number of policies within the Mid Suffolk Local Plan Core Strategy directly relate to the population and communities theme, including:

- CS1: Settlement Hierarchy;
- CS2: Development in the Countryside and Countryside Villages;
- CS6: Services and Infrastructure;
- CS11: Source of Employment Land; and
- CS12: Retail Provision.

There are also many policies within the emerging Babergh and Mid Suffolk Joint Local Plan which directly relate to the health and wellbeing theme, including:

- SP01: Housing Needs;
- SP02: Affordable Housing;
- SP04: Housing Spatial Distribution;
- SP05: Employment Land; and

⁹¹ 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/>

⁹² Babergh & Mid Suffolk District Councils Joint Homelessness Reduction and Rough Sleeping Strategy 2019-2024 <https://www.babergh.gov.uk/assets/Housing-and-Homelessness/Housing-Strategy/HRRSS-2019-2024-Final.pdf>

- SP08: Strategic Infrastructure Provision.

Baseline information

Population trends

As shown in **Table AB.4** (below), the population of Redgrave has decreased over the period of 2011- 2019 (mid-year estimate) by 8.0%. In comparison, the population of Mid Suffolk has increased by 7.4% over the same period, in line with trends for the East of England and England as a whole. However it is noted that the country-wide algorithm is indicative, and looking back further to 2001 census data, a population increase is observed between 2001 and 2011 data.

Table AB.4 Population change (2011- 2019)

Date	Redgrave	Mid Suffolk	East of England	England
2011	459	96,731	5,846,965	53,012,456
2019 mid-year estimate	422	103,895	6,236,072	56,286,961
Population Change between 2011- 2019 mid estimate	-8.0%	+7.4%	+6.6%	+6.1%

Table AB.5 (below) indicates that the largest group within the population are the 60+ age group, following trends for the district; but dissimilar to that of the East of England and England where the 25-44 age category is the largest. The proportion of residents within the 60+ age group is more pronounced for Redgrave than for Mid Suffolk, and it is noted that the 45-59 age category is the second largest for Redgrave; reinforcing the ageing population present within the parish.

Table AB.5 Age structure

	Redgrave	Mid Suffolk	East of England	England
0-15	15.03%	18.43%	18.96%	18.90%
16-24	7.63%	9.19%	10.92%	11.90%
25-44	16.99%	22.94%	26.45%	27.50%
45-59	27.89%	21.52%	19.78%	19.40%
60+	32.46%	27.93%	23.89%	22.30%
Total Population	459	96,731	5,846,965	53,012,456

Household deprivation

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

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

Table AB.6 Relative household deprivation

	Redgrave	Mid Suffolk	East of England	England
Household not deprived	51.03%	48.75%	44.76%	42.50%
Deprived in 1 dimension	32.99%	32.28%	32.98%	32.70%
Deprived in 2 dimensions	14.43%	16.25%	17.92%	19.10%
Deprived in 3 dimensions	1.55%	2.59%	3.96%	5.10%
Deprived in 4 dimensions	0.00%	0.14%	0.38%	0.50%

Based on the information presented in **Table AB.6**, a large proportion of households are not deprived in any area; a higher proportion than comparative figures for Mid Suffolk, the East of England and England.

The Index of Multiple Deprivation 2019 (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:

- **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).
- **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.
- **Education, Skills and Training:** The lack of attainment and skills in the local population.
- **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.

- **Crime:** The risk of personal and material victimisation at local level.
- **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
 - ‘Geographical Barriers’: relating to the physical proximity of local services
 - ‘Wider Barriers’: relating to access to housing, such as affordability.
- **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
 - a. ‘Indoors Living Environment’ measures the quality of housing.
 - b. ‘Outdoors Living Environment’ measures air quality and road traffic accidents.

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

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

Lower Super Output Areas (LSOAs)⁹³ are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardised 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 2019, 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.

In this regard, Redgrave sits within the Mid Suffolk 002D LSOA and Mid Suffolk 002E LSOA.⁹⁴

There is a considerable contrast between deprivation levels in the east (Mid Suffolk 002D) and the west of the parish (Mid Suffolk 002E); with the west (including the main village settlement) being more deprived. The west is one of the 30% least deprived IMD areas in the country, while the east is within the 50% most deprived IMD areas.

Housing tenure

Figure AB.12 shows that the majority of residents in the Neighbourhood Plan area own their own homes (87.1%), larger than comparative figures for Mid Suffolk (75.1%), the East region (67.6%) and the country as a whole (63.3%).

⁹³ DCLG (2019): Indices of Deprivation Explorer', [online] available at: https://dclgapps.communities.gov.uk/imd/iod_index.html

⁹⁴ Index of Multiple Deprivation 2019 [online] available at: <https://maps.cdrc.ac.uk/#/geodemographics/imde2019/default/BTTTTFT/14/1.0063/52.3618/>

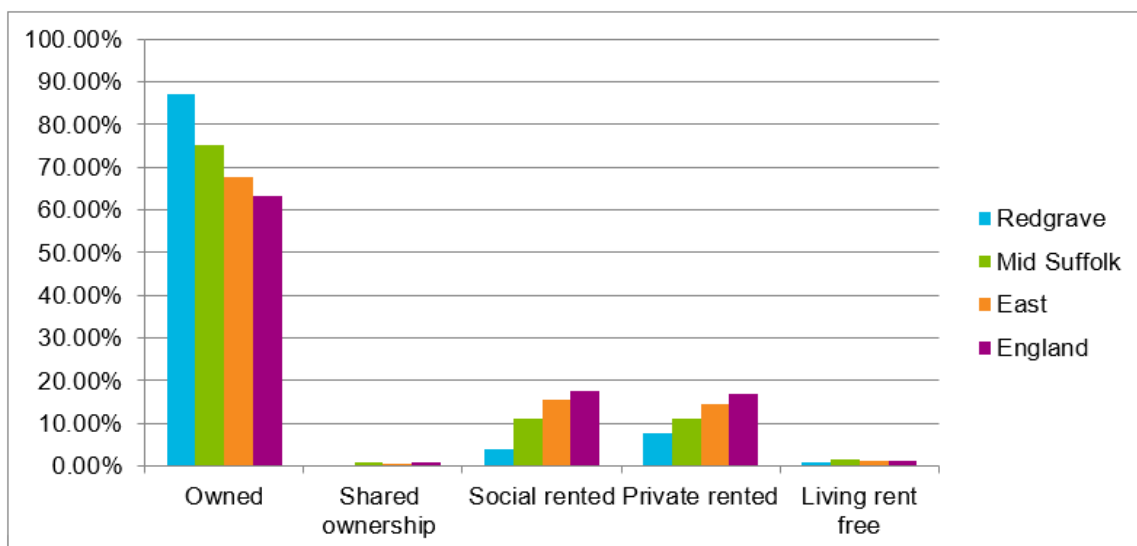


Figure AB.12 Housing tenure

Level of qualification

As shown in **Figure AB.13** (overleaf), the population of Redgrave demonstrates comparatively high levels of qualification in comparison to the district, region and country as a whole. Notably there is a particularly large proportion of residents in Redgrave who have at least a Level 4 qualifications & above (33.9%), which is considerably higher than all other comparators.

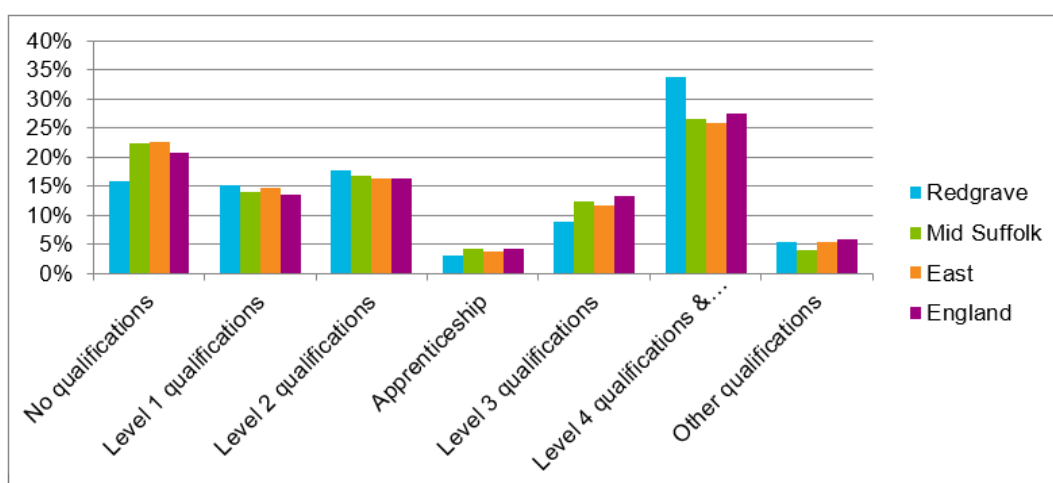


Figure AB.13 Level of qualification

Employment

Regarding employment within the Neighbourhood Plan area, the following two occupational categories support the most residents (**Figure AB.14**):

- Professional occupations (21.49%); and
- Managers, directors, senior officials (16.23%).

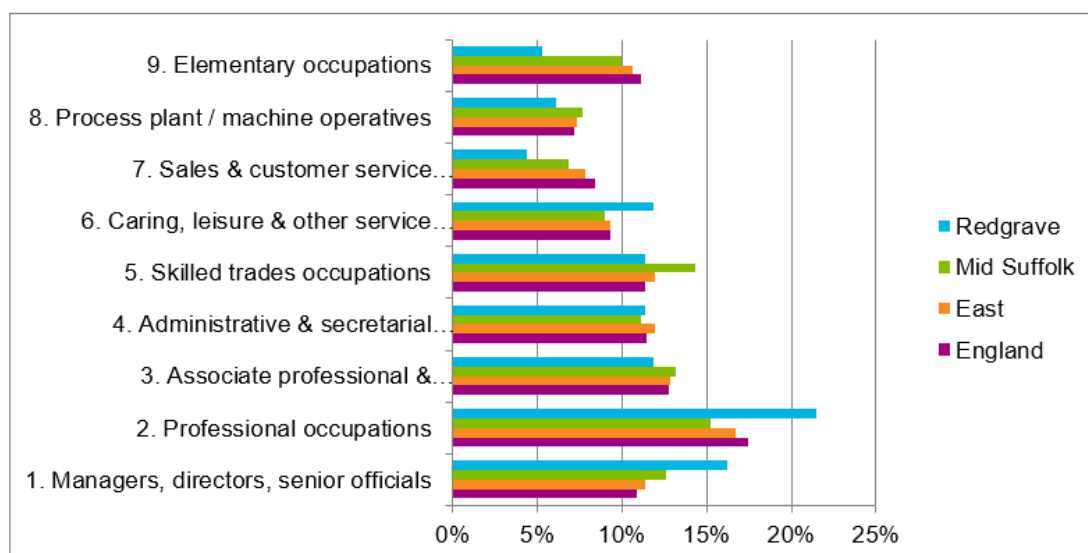


Figure AB.14 Occupation of usual residents

Local businesses

The parish includes a number of locally-based businesses and workforce, including the pub and the shop, farms, small enterprises (including workshops and those working from home).

The largest business in Redgrave is Gressingham Foods, and there are also two business parks present; Hall Farm Business Park and Redgrave Business Park.

Hall Farm Business Park is situated on Churchway opposite the Church at the Hall Farm site. There are four businesses at this site: a brewery and tap room, an electric bike company, a poultry solutions firm and a baker.

There are four businesses at Redgrave Business Park on the B1113 at Gallows Hill in Redgrave. These include a carpet supplier (who has recently set up in the Park), an upholstery business, and a double glazing firm. The final business at the Business Park makes specialist parts for racing cars.

In common with much of the UK in light of the ongoing COVID-19 pandemic, there are a high number of local residents who work from home either as employed or self-employed professionals.

Community facilities

Redgrave is well endowed with community and recreational facilities, including:

- An amenities hall with a kitchen, a main hall and a smaller room, showers, toilets and changing rooms.
- A public house which is owned by the Community and acts as a business/IT and community hub.
- A community shop.
- 3 football pitches.
- Outdoor play facilities for children.
- A number of 'clubs' including theatre and arts.

- A brewery with a tap room and cafe where beer festivals, quizzes and theatrical performances are held.
- A book swap housed in a telephone kiosk on The Knoll.
- Various discussion groups.
- A mobile library service once a month.
- Many organised activities for tots to adults at Redgrave & Lopham Fen.
- The rural surroundings are an important leisure asset with many opportunities for walking, cycling, horse riding and other outdoor pursuits.
- Good Public Rights of Way network with connections to neighbouring villages.

Future baseline

The population will continue to grow, although it is recognised that current trends indicate this will be a slower rate than that of district, regional and national comparators.

The suitability (e.g. size and design) and affordability of housing to meet local needs will depend on the implementation of appropriate housing policies through the emerging Joint Local Plan and Neighbourhood Plan. Unplanned development may have wider implications in terms of delivering the right mix of housing types, tenures and sizes in suitably connected places.

The Neighbourhood Plan area is identified as having an ageing population, which if this trend were to continue, could potentially negatively impact upon the future vitality of the local community and economy. Furthermore, additional pressure could be placed on the Parish's variety of community facilities and services.

However, new development could also enhance access to the local employment offer and increase the existing high levels of working from home within the Plan area (depending on the exact location, design and layout of development). Consideration should also be given to access to schools and local services/ facilities in this respect, recognising the importance of connectivity to support sustainable growth.

Health and wellbeing

Policy context

Key messages from the National Planning Policy Framework⁹⁵ (NPPF) include that planning policies should:

- Enable and support healthy lifestyles through provision of green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
- Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
- Help deliver access to high quality open spaces and opportunities for sport and physical activity to contribute to the health and well-being of communities.

⁹⁵ MHCLG (2019) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

National Planning Practice Guidance (NPPG)⁹⁶ identifies that local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making.

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.

The Fair Society, Healthy Lives ('The Marmot Review')⁹⁷ 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”*.

Health Equity in England: The Marmot Review 10 Years On (2020) has been produced by the Institute of Health Equity and commissioned by the Health Foundation to mark 10 years on from the landmark study Fair Society, Healthy Lives (The Marmot Review).⁹⁸ The report highlights that:

- people can expect to spend more of their lives in poor health;
- improvements to life expectancy have stalled, and declined for the poorest 10% of women;
- the health gap has grown between wealthy and deprived areas; and
- place matters – for example living in a deprived area of the North East is worse for your health than living in a similarly deprived area in London, to the extent that life expectancy is nearly five years less.

The Joint Strategic Plan Refresh 2016-2020⁹⁹ provides an assessment of the current and future health and wellbeing needs of the people of Babergh and Mid Suffolk until 2020.

The Babergh and Mid Suffolk Open Space Assessment (2019) examines existing and projected needs for open space, sport and recreation provision, using a variety of data sources, together with independent investigation and Town and Parish Council survey.¹⁰⁰ The assessment covers open space, including amenity and natural space, parks and recreation grounds, play space and allotments. Recommendations of this assessment include the basis for the formulation of policies related to open space to be considered for inclusion within the emerging joint local plan.

⁹⁶ Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

⁹⁷ The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available at: <http://www.nice.org.uk/nicemedia/live/12111/53895/53895.pdf>

⁹⁸ Health Equity in England: The Marmot Review 10 Years On (2020) <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

⁹⁹ Joint Strategic Plan Refresh 2016-2020 available at: <https://www.babergh.gov.uk/assets/The-Council/Performance/Joint-Strategic-Plan-2016-2020.pdf>

¹⁰⁰ Babergh and Mid Suffolk District Councils (2019) Babergh and Mid Suffolk Open Space Assessment [online] available at: <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Babergh-and-Mid-Suffolk-Open-Space-Study-May-2019.pdf>

A number of policies within the Mid Suffolk Local Plan Core Strategy indirectly relate to the health and wellbeing theme, including:

- CS1: Settlement Hierarchy;
- CS2: Development in the Countryside and Countryside Villages;
- CS5: Mid Suffolk's Environment; and
- CS6: Services and Infrastructure.

There are also many policies within the emerging Babergh and Mid Suffolk Joint Local Plan which directly relate to the health and wellbeing theme, including:

- SP04: Housing Spatial Distribution;
- SP08: Strategic Infrastructure Provision;
- SP09: Enhancement and Management of the Environment;
- LP30: Designated Open Spaces;
- LP32: Safe, Sustainable and Active Transport; and
- LP34: Health and Education Provision.

Baseline information

Health indicators

General health in Redgrave is largely 'good' or 'very good' (82.6%), in line with figures for Mid Suffolk (83.2%), the East of England (82.5%) and England as a whole (81.4%) (**Figure AB.15** overleaf).

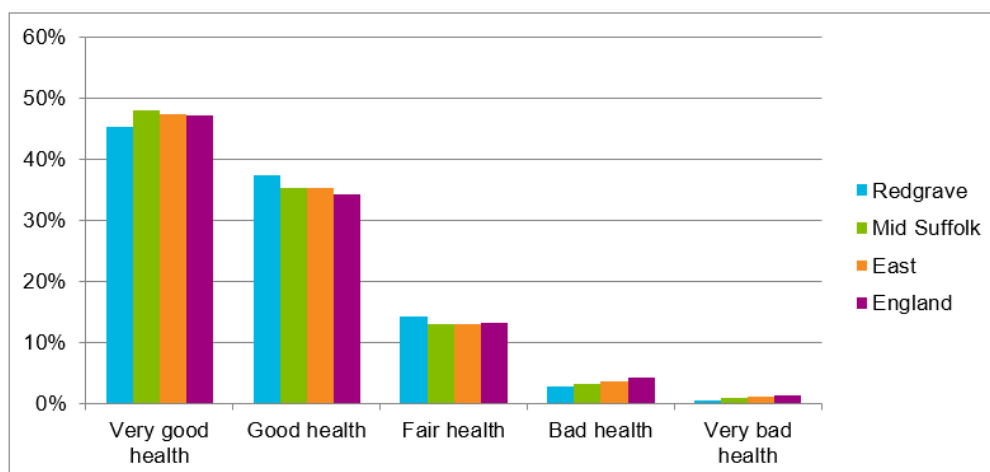


Figure AB.15 General health

Census data presented in **Figure AB.16** shows that the majority of residents with disabilities are not limited in their day-to-day activities. This is higher than comparative figures for Mid Suffolk (83.5%), the East (83.3%) and England as a whole (82.4%).

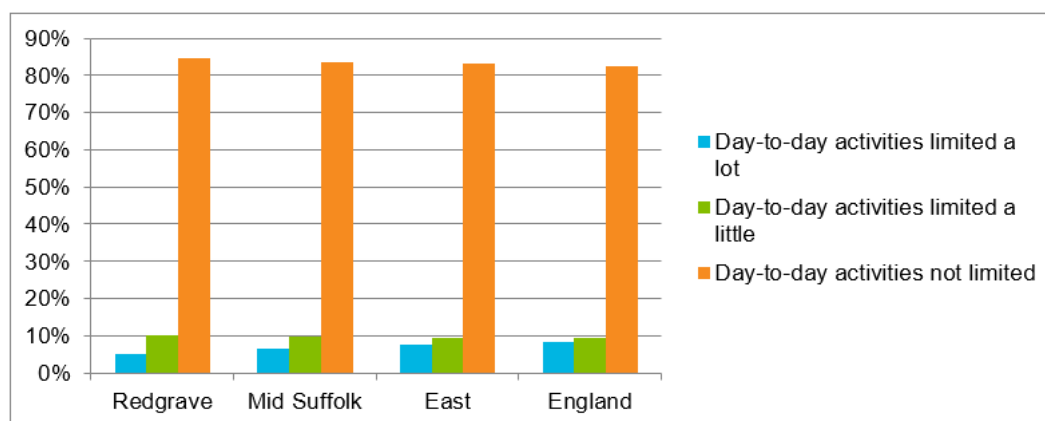


Figure AB.16 Disability

Research into hidden needs in Suffolk highlighted the additional challenges facing rural communities in the County, such as higher domestic fuel costs, extra transport costs, and accessibility to education services and employment opportunities. Key issues affecting the health and wellbeing of rural communities include¹⁰¹:

- low paid work;
- fuel poverty;
- high housing costs;
- unemployment among young people;
- social isolation, especially among older people;
- difficulty accessing healthcare services such as GPs and dentists;
- lack of suitable public transport options; and
- poor broadband and mobile phone network availability.

The State of Suffolk Report (2019)¹⁰² outlines key issues from the Joint Strategic Needs Assessment (JSNA) for Suffolk. The following trends prevalent within the County are identified in the JSNA:

- Currently, about 1 in 5 people living in Suffolk are aged 65 or over. Over the next 20 years, this is forecast to change, with 1 in 3 Suffolk residents being aged 65 or over, compared to 1 in 4 for England.
- Young people aged 16-17 who are not in education, employment or training are sometimes referred to as being NEET. Suffolk is within the worst performing 20% of local authorities in England in this regard.
- In Suffolk, the employment rate is higher than the national average. In the year to December 2018, 365,200 people in Suffolk were in employment, meaning that nearly 4 in 5 adults of working age were in work (78.5%). However, with an older age profile than most areas of the UK, Suffolk has a lower proportion of people of working age compared to other parts of the country.

¹⁰¹ Healthy Suffolk (2019) State of Suffolk Report 2019 [online] available at: <https://www.healthysuffolk.org.uk/jsna/state-of-suffolk-report/sos19-where-we-live>

¹⁰² Mid Suffolk Council (2019) JSNA Summary [online] available from: https://www.healthysuffolk.org.uk/uploads/SF1160_-_JSNA_State_of_Suffolk_Report_2019_Ex_Summary_LR.pdf

- In 2016/17, it was estimated that 1 in 5 working age adults in Suffolk were living with a disability (around 80,000 people) and nearly 1 in 2 state pension aged adults were living with a disability (around 87,000 individuals).
- Severe Mental Illness (SMI) describes conditions such as schizophrenia, bipolar disorder and other psychoses (conditions which involve losing touch with reality or experiencing delusions). In 2017/18, nearly 6,600 people registered with a GP in Suffolk had a diagnosis of SMI.
- In 2016/17, more than 6 in 10 adults were overweight or obese in Suffolk.
- Suffolk residents typically live longer than the England average and females generally live longer than males.
- Of around 4,500 new cancer diagnoses in Suffolk in 2014, nearly 2,000 were attributed to major modifiable risk factors: around 900 were linked to smoking, 250 to unhealthy weight and 200 to a lack of fruit and vegetables.

'Local Authority Health Profiles' have been produced by Public Health England to provide an annual picture of health in local authority areas. The profiles are used to help local government and health services understand their community's needs, so that they can work together to improve people's health and reduce health inequalities. The 2019 profile for Mid Suffolk summarises the health of the district as generally better than the England average.¹⁰³ About 10.1% (1,590) children live in low income families. Life expectancy for both men and women is higher than the England average. However, life expectancy is 6.4 years lower for men and 3.6 years lower for women in the most deprived areas of Mid Suffolk than in the least deprived areas.¹⁰⁴

Healthcare provision

With regards to healthcare provision, Botesdale Health Centre is situated outside of the draft Plan area, in the neighbouring village of Botesdale (approximately 2km south from the village centre). The closest NHS hospital with A&E services is West Suffolk Hospital situated approximately 24km from the village centre.

Open spaces

The Babergh and Mid Suffolk Open Space Assessment (2019) indicates that Redgrave is well served in terms of recreational open space when measured against other local standards using per head of the population and in fact has a surplus of this form of open space (+4.42hectares).¹⁰⁵ However, in the village there are slight shortfalls in other types of open space such as Allotments (-0.04), Amenity Space (-0.46) and Youth provision (-0.01).

Future baseline

The lack of direct healthcare services within the Plan area coupled with the ageing population of Redgrave (see **Chapter 8**) has the potential to lead to the decline in access to essential services for residents. The RNP should seek to support the retention and improvement of important facilities within the Plan area, such as open spaces, essential services, community facilities, and access to Public Rights of Way (PRoW) in order to support healthy lifestyles in future years. The importance of local

¹⁰³ Public Health England (2020) Mid Suffolk Local Authority Health Profile 2019 [online] available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000203.html?area-name=mid%20suffolk>

¹⁰⁴ Ibid.

¹⁰⁵ Ethos Environmental Planning (2019) Babergh and Mid Suffolk Open Space Assessment [online] available at: <https://www.babergh.gov.uk/planning/planning-policy/evidence-base/current-evidence/open-space-assessment/>

accessibility and connected communities has been highlighted during the course of the ongoing pandemic.

With ongoing advances in technology, healthcare and lifestyles, people are tending to live longer than before. Suffolk has fewer working age people relative to older people than the national average, which may result in increased demand for health and care services. Given the ageing population of Suffolk and the financial challenges facing the NHS and social care, it is likely that more housing aimed at older people will be required in the future.

The mental and physical health of residents in the Neighbourhood Plan area have the potential to worsen over time, in line with trends identified in the Suffolk JSNA. Recognising that people's health is determined primarily by a range of social, economic and environmental factors, social prescribing seeks to address people's needs in a holistic way.

Transportation

Policy context

Key messages from the National Planning Policy Framework¹⁰⁶ (NPPF) include:

- Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
 - The potential impacts of development on transport networks can be addressed;
 - Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised;
 - Opportunities to promote walking, cycling and public transport use are identified and pursued;
 - The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account; and
 - 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.

National Planning Practice Guidance (NPPG)¹⁰⁷ identifies that it is important for local planning authorities to undertake an assessment of the transport implications in

¹⁰⁶ MHCLG (2019) National Planning Policy Framework [online] available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

¹⁰⁷ Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan.

The Transport Investment Strategy - Moving Britain Ahead (2017)¹⁰⁸ sets out the Department for Transport's approach for future investment decisions and priorities. At the local level, the strategy relies on devolved decision-making where local communities have the power and will be backed by funding. Investment aims to achieve a transport network that is reliable, well-managed, safe, and works for everyone. The transport system should also provide smooth, fast and comfortable journeys, and have the right connections in the right places.

The Cycling and Walking Investment Strategy (2016)¹⁰⁹ sets out the objectives that the DfT are working towards to meet the following walking and cycling ambition for England, *"We want to make cycling and walking the natural choice for shorter journeys, or as part of a longer journey"*

The objectives and target set to measure progress towards the 2040 ambition are to:

- Double cycling, where cycling activity is measured as the estimated total number of bicycle stages made each year, from 0.8 billion stages in 2013 to 1.6 billion stages in 2025;
- Reverse the decline in walking activity;
- Reduce the rate of cyclists killed or seriously injured on England's roads, measured as the number of fatalities and serious injuries per billion miles cycled, each year; and
- Increase the percentage of children aged 5 to 10 that usually walk to school.

Department for Transport (2020) Decarbonising Transport: Setting the Challenge (2020)¹¹⁰ sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050.

In February 2020, the government announced a new £5 billion 5-year funding package to overhaul bus and cycle links for every region outside London.¹¹¹ This builds on the Government's determination to make buses work better for their passengers. The details of these programmes will be announced in the upcoming National Bus Strategy, to be published later in 2020, and follows the allocation of £170 million to support more electric buses, increase rural mobility and trial new 'Superbus' services.

Cycle routes will also see a major boost across the country with over 250 miles of new, high-quality separated cycle routes and safe junctions in towns and cities to be constructed across England, as part of the multibillion pound package announced

¹⁰⁸ Department for Transport (2017) Transport Investment Strategy - Moving Britain Ahead [online] available at: <https://www.gov.uk/government/publications/transport-investment-strategy>

¹⁰⁹ Department for Transport (2016) Cycling and Walking Investment Strategy [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/512895/cycling-and-walking-investment-strategy.pdf

¹¹⁰ Department for Transport (2020) Decarbonising Transport: Setting the Challenge [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/876251/decarbonising-transport-setting-the-challenge.pdf

¹¹¹ Department for Transport (2020) Major boost for bus services as PM outlines new vision for local transport [online] available at: <https://www.gov.uk/government/news/major-boost-for-bus-services-as-pm-outlines-new-vision-for-local-transport>

Each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008. The Suffolk Local Transport Plan 2011-2031 is published by Suffolk County Council and sets out proposed transport solutions for the Plan area up to 2031, with a focus on enabling sustainable economic growth.

Policy CS6 (Services and Infrastructure) within the Mid Suffolk Local Plan Core Strategy relates to the transportation theme.

There are also many policies within the emerging Babergh and Mid Suffolk Joint Local Plan which directly relate to the transportation theme, including:

- SP08: Strategic Infrastructure Provision;
- LP32: Safe, Sustainable and Active Transport; and
- LP33: Managing Infrastructure Provision.

Baseline information

Local transport infrastructure

Redgrave is located approximately 9km west of Diss and is surrounded by two A-roads to the north and south (A1066 and A413, respectively). These A-roads eventually connect the village with major retail and employment centres such as Norwich (north via the A11 or A140), Bury St Edmunds (to the south west via the A14) and Thetford (to the north west via the A1066).

Transport and highway safety are key issues for the community. In rural areas such as Redgrave, the lack of public and alternative travel options to the private vehicle are a concern for residents, in addition to traffic speeds, HGVs on rural roads, and the condition of the highway (condition for both motorists and pedestrian access).

In terms of public transport, the nearest railway station is Diss, approximately 9km east of Redgrave village. The station is operated by Greater Anglia, and served by regular (half hourly) services to London Liverpool Street and hourly services to Norwich.¹¹²

Bus services in the parish are limited, with services running only to and from Diss, and to and from Bury St Edmunds. The service runs on weekdays with a reduced service on Saturdays. There are four buses a day to Bury St Edmunds and four to Diss. The only bus stop in the village is opposite the village sign on the Knoll.

The parish is served by a good Public Rights of Way (PRoW) network, with footpaths connecting the village internally, and externally to neighbouring settlements and Redgrave Fens.

Car ownership

Figure AB.17 below shows that car ownership in the Plan area (94.8%) is comparably higher than figures for Mid Suffolk (88.7%), the East (81.4%) and England (74.0%). Notably, a higher proportion of Redgrave residents have 2 or more cars (39.2%) in comparison to Mid Suffolk (36.0%), the East (20.1%) and England as a whole (25.0%).

¹¹² Greater Anglia (2020) Live Departures and Arrivals for Diss [online] available at: <https://www.greateranglia.co.uk/travel-information/live-departure-arrival-boards/DIS>

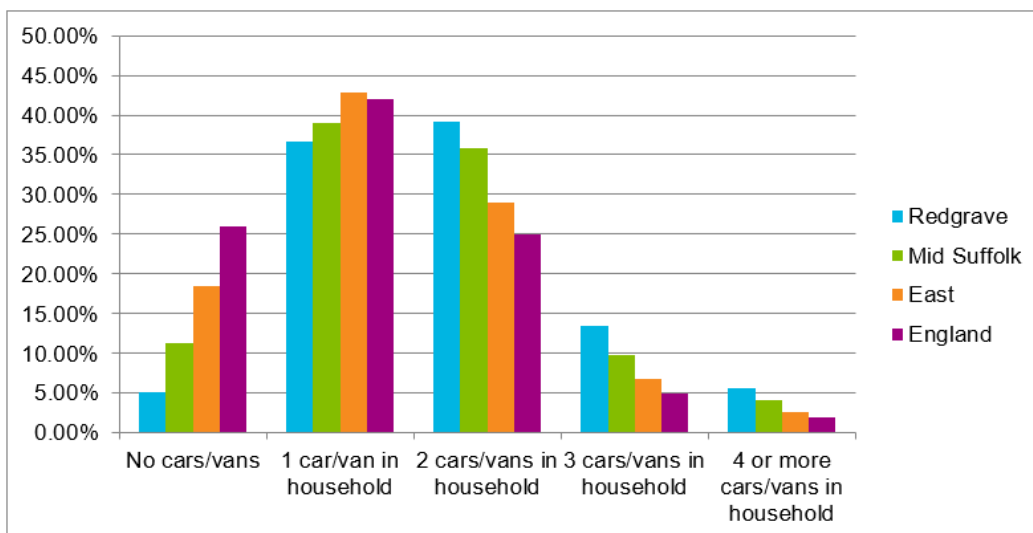


Figure AB.17 Car ownership

Travel to work

Figure AB.18 below shows that a large proportion of residents travel to work via driving a car or van (48.0%) which is on par with figures for Mid Suffolk (48.5%) (likely given the rural nature of the district). The proportion of residents travelling to work via driving a car or van is however lower in the East of England (41.4%) and England as a whole (37.0%).

Additionally, a large proportion of residents in Redgrave work from home (8.6%), compared to Mid Suffolk (5.94%), the East (3.8%) and England as a whole (3.0%). Only a small proportion of residents in the Plan area choose to commute to work on foot (0.9%).

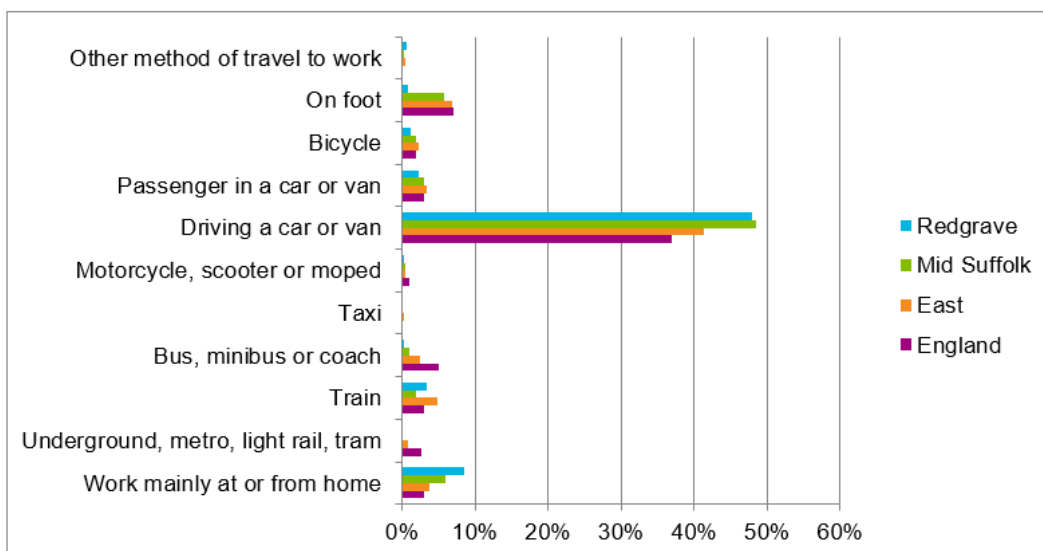


Figure AB.18 Travel to work

Future baseline

In the absence of strategic transport interventions, growth in the Neighbourhood Plan area is likely to continue trends which favour the private vehicle as the primary mode of transport. New development therefore has the potential to increase traffic and lead to additional localised congestion issues which in turn may reduce road safety.

A key concern in this respect is the dual carriage way and the 'rat run' impacts. Further to this, it is considered that public transport use is likely to remain low compared with private car use given the lack of accessible public transport options.

The Neighbourhood Plan can support small-scale infrastructure improvements and active travel opportunities that seeks to maximise opportunities for pedestrian and cyclist movements. Additionally, given trends towards working from home in Redgrave, particularly when considering the ongoing COVID-19 pandemic, it is important for planning to ensure sufficient infrastructure to enable suitable internet connectivity.

