

# Strategic Environmental Assessment (SEA) for the Glemsford Neighbourhood Plan

Environmental Report to accompany the submission version of the  
Neighbourhood Plan

Glemsford Parish Council

September 2024

## Quality information

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## Revision History

Revision	Revision date	Details	Name	Position
V1	June 2024	Working draft	RC	Senior Environmental Planner
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# Non-Technical Summary

## What is Strategic Environmental Assessment (SEA)?

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

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

## What is the Glemsford Neighbourhood Plan?

The GNP is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. It is being prepared in the context of the local development framework for Babergh and Mid Suffolk District Council, which includes the adopted Babergh and Mid Suffolk Joint Local Plan Part 1 (November 2023) (JLP), and saved policies from the Babergh Local Plan (2006). Due regard is also given to the emerging Babergh and Mid Suffolk Joint Local Plan Part 2; however, it is recognised that this is in the early stages of plan making.

## Purpose of this Environmental Report

This Environmental Report, which accompanies the submission version of the Neighbourhood Plan, is the latest document to be produced as part of the SEA process. The first document was the SEA Scoping Report (May 2024), which includes information about the Neighbourhood Plan area's environment and community.

The purpose of this Environmental Report is to:

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

The Environmental Report contains:

- An outline of the contents and main objectives of the Glemsford Neighbourhood Plan and its relationship with other relevant policies, plans and programmes;
- Relevant aspects of the current and future state of the environment and key sustainability issues for the area;
- The SEA Framework of objectives against which the Glemsford Neighbourhood Plan has been assessed;

- The appraisal of alternative approaches for the Glemsford Neighbourhood Plan;
- The likely significant effects of the Glemsford Neighbourhood Plan;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the Glemsford Neighbourhood Plan; and
- The next steps for the Glemsford Neighbourhood Plan and accompanying SEA process.

## Assessment of reasonable alternatives for the Glemsford Neighbourhood Plan

A key element of the SEA process is the appraisal of 'reasonable alternatives' for the Neighbourhood Plan.

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

This work identified four options with the potential to deliver housing growth within Glemsford as follows:

- **Option 1:** Land east of Duffs Hill (25-30 homes)
- **Option 2:** Land west of Duffs Hill (10 homes)
- **Option 3:** Land west of Park Lane (100 homes)
- **Option 4:** Land south-east of George Lane (20-30 homes)

With regards to methodology, for each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability topics and objectives identified through scoping (see Appendix B) as a methodological framework. Green shading is used to indicate significant positive effects, whilst red shading is used to indicate significant negative effects, however this is also stated in the text. Where appropriate, neutral effects, or uncertainty will also be noted. Uncertainty is noted with grey shading.

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.

The assessment of these options concludes the following:

SEA Theme	Option A	Option B
Biodiversity	Significant effect? No	Yes - uncertain

	Rank	1	2
<b>Climate change (including flood risk)</b>	<b>Significant effect?</b>	No	No
	Rank	2	1
<b>Community wellbeing</b>	<b>Significant effect?</b>	Yes - positive	Yes - positive
	Rank	2	1
<b>Historic environment</b>	<b>Significant effect?</b>	Yes - negative	No
	Rank	2	1
<b>Landscape</b>	<b>Significant effect?</b>	Yes - negative	Yes - negative
	Rank	= 1	= 1
<b>Land, soil and water resources</b>	<b>Significant effect?</b>	Yes - negative	Yes - negative
	Rank	1	2
<b>Transportation and movement</b>	<b>Significant effect?</b>	Yes – negative	Yes – uncertain
	Rank	2	1

Overall, a number of potential significant effects have been identified. Significant positive effects have been identified for both options with regard to community wellbeing, which represents the options contributing additional housing to meet the local needs. **Option B** ranks the most favourably for this theme for a number of reasons, including the potential to improve accessibility, opportunities to provide community facilities and improve existing ones, as well as integration into the community.

Uncertain significant effects were identified in relation to biodiversity for **Option B**. This is due to development through this site providing opportunities to develop green infrastructure, however the site is in proximity to an SSSI and is delivering a large level of growth, which could impact the asset. For this SEA theme, **Option A** was found to perform more favourably. Uncertain significant effects were also found for transportation through **Option B**, due to the potential that this site has to both increase congestion within the area, but also improve sustainable transport links.

Significant negative effects were found for both options with regard to landscape and land, soil and water resources, which represents the fact that development through either option will result in a loss of greenfield land, and of 'best and most versatile' agricultural land. Further, significant negative effects were found to be likely through **Option A** in relation to historic environment, and transportation and movement. This

is due to the location of Site 1 which is adjacent to the conservation area and listed buildings, as well as the roads which the sites are on being unlikely to support an increase in private vehicles.

**Option B** was found to rank more favourably in most themes, except for in biodiversity and land, soil and water resources, as well as landscape, in which it ranked equally with **Option A**.

## Assessment of the Glemsford Neighbourhood Plan

The assessment of the submission version of the GNP has concluded that:

*“Overall, long-term **significant positive effects** are considered likely with regard to the community wellbeing SEA topic. This is because the draft GNP will help meet the local housing need, and seeks to protect and enhance community facilities, employment opportunities, and local green space and the countryside. Combined, these will positively contribute to the quality of life and wellbeing of residents in the neighbourhood area.*

***Minor positive effects** are considered likely for the transportation SEA topic through the draft GNP, which reflects the focus of plan policies on safeguarding and extending the existing PRow network, parking provision, and providing safe access to and from the site allocation for pedestrians, cyclists and vehicles.*

***Minor positive effects** are also concluded as most likely in relation to biodiversity predominantly due to policy measures that seek to enhance biodiversity in the area.*

***Broadly neutral effects** are predicted for the climate change and flood risk topic. This reflects the unlikely deviation from baseline conditions, linked to the site allocation area, and the policy provisions.*

***Minor negative effects** are considered likely in relation to landscape. This reflects the location of the site adjacent to the settlement boundary, and the mitigation measures included in the site allocation policy to reduce landscape impacts. It also considers the wider policy provision. Long-term **minor negative effects** are also considered likely under the land, soil and water resources SEA topic. This is due to loss of greenfield land, and the potential loss of productive (i.e. BMV) agricultural land. **Minor negative effects to potentially neutral effects** are concluded in relation to the historic environment, as whilst there are few assets that constrain the site, large-scale development would need to be sensitively designed to minimise impacts on historic character.”*

## Next steps

The Glemsford Neighbourhood Plan and this Environmental Report will be submitted to Babergh District Council for subsequent Independent Examination.

At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with strategic policies of the adopted Local Plan.

If the Independent Examination is favourable, the Neighbourhood Plan will be subject to a referendum, organised by Babergh District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be ‘made’ (i.e.

brought into force). Once made, the Neighbourhood Plan will become part of the Development Plan for Glemsford Parish.



**Figure 1.1: A map of the Lambourn neighbourhood area**

# 1. Introduction

## Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) for the Glemsford Neighbourhood Plan (GNP).
- 1.2 The GNP has been prepared as a Neighbourhood Development Plan under the Localism Act 2011. The Neighbourhood Plan is being prepared in the context of the local development framework for Babergh and Mid Suffolk District Council, which includes the adopted Babergh and Mid Suffolk Joint Local Plan Part 1 (November 2023)<sup>1</sup> (JLP), and saved policies from the Babergh Local Plan (2006).<sup>2</sup> Due regard is also given to the emerging Babergh and Mid Suffolk Joint Local Plan Part 2; however, it is recognised that this is in the early stages of plan making.<sup>3</sup>
- 1.3 It is currently anticipated that the GNP will be submitted to Babergh District Council later in 2024.

## SEA explained

- 1.4 The GNP has been screened in by LUC on behalf of Babergh District Council (December 2023) as requiring SEA, stating<sup>4</sup>:

*“The Neighbourhood Plan sets out a vision, objectives and 13 planning policies to shape development in the parish up to 2037 and decision makers will need to consider the criteria of these policies when determining future applications in the parish. The Neighbourhood Plan does directly impact on land use through the allocation of one site for 100 new homes. The site does not yet have planning consent.*

*The residential development allocated through the NDP could have a range of environmental effects during the construction period and afterwards, in particular in relation to additional traffic generation and demand for water treatment.*

*The proposed housing allocation at Land west of Park Lane, in the Glemsford Neighbourhood Plan lies within close proximity of sensitive features including priority habitats, and a number of listed buildings. There are policies in the Neighbourhood Plan and in the adopted Babergh and Mid Suffolk Joint Local Plan (Part 1) that may provide mitigation. However, given the scale of the allocated site that does not have existing planning permission and the sensitivity of the area in which it is located, it is considered that the Glemsford Neighbourhood Plan has the potential to have significant environmental effects and that SEA is therefore required.”*

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<sup>1</sup> Babergh District Council and Mid Suffolk District Council (2023) 'Babergh and Mid Suffolk Joint Local Plan Part 1' can be accessed [here](#).

<sup>2</sup> Babergh District Council and Mid Suffolk District Council (2006) 'Babergh Local Plan' can be accessed [here](#).

<sup>3</sup> Babergh District Council and Mid Suffolk District Council (no date) 'New Joint Local Plan homepage' can be accessed [here](#).

<sup>4</sup> Land Use Consultants (2023) 'Glemsford Neighbourhood Plan SEA Screening Opinion' can be accessed [here](#).

- 1.5 SEA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and reasonable alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding or mitigating negative environmental effects and maximising positive effects. Through this approach, the SEA for the GNP seeks to maximise the emerging Neighbourhood Plan's contribution to sustainable development.
- 1.6 The SEA has been prepared in conformity with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.

## Structure of this Environmental Report

- 1.7 It is a requirement that the SEA process is undertaken in-line with the Environmental Assessment of Plans and Programmes Regulations 2004. The Regulations stipulate that a report (known as the Environmental Report) must be published for consultation alongside the draft plan that “*identifies, describes, and evaluates*” the likely significant effects of implementing “*the plan, and reasonable alternatives*”.<sup>5</sup> The report must then be considered when finalising the plan.
- 1.8 More specifically, the Environmental Report must answer the following three questions:
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 submission plan.
  3. What happens next?
- 1.9 This report essentially answers questions 1, 2 and 3 in turn, in order to provide the required information. Each question is answered within a discrete ‘part’ of the report. However, two initial questions are first answered in order to further set the scene, these are; what is the Glemsford Neighbourhood Plan seeking to achieve; and what is the scope of the SEA?

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<sup>5</sup> Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

## 2. Local planning policy context

- 2.1 Glemsford Parish lies within Babergh District and is being developed in the context of Babergh and Mid Suffolk District Council's local development framework. The adopted planning framework consists of:
- Babergh and Mid Suffolk Joint Local Plan Part 1 (adopted 2023); and
  - Saved policies of the Babergh Core Strategy (adopted 2014) and the Babergh Local Plan (adopted 2006).
- 2.2 Glemsford was designated as a "Core Village" in the Babergh Core Strategy (2014) recognising that it provides a range of services and facilities for smaller villages in its hinterland.
- 2.3 Within the JLP Part 1 (2023) Policy SP01 Housing Needs identifies a need to deliver at least 7,904 new homes in Babergh between 2018 and 2037. As of 2021 85% of this target had already met through completions, commitments, or windfall development, leaving a shortfall of at least 1,191 new homes to be addressed in JLP Part 2.
- 2.4 Babergh and Mid Suffolk Joint Local Part 2 (JLP Part 2) will follow the JLP Part 1 and is anticipated to be adopted in 2026. The JLP Part 2 will include items such as:
- an up-to-date settlement hierarchy;
  - a spatial distribution of any housing allocations;
  - housing requirement figures for neighbourhood plan areas;
  - site allocations;
  - up-to-date settlement boundaries reflecting commitments and allocations;
  - open space designations with a relevant development management policy; and
  - an up-to-date assessment of need for accommodation for Gypsies, Travellers, Travelling Showpeople and Boat Dwellers, together with relevant development management policies and, if necessary, allocations to provide for this need.
- 2.5 In the absence of a settlement hierarchy, there is currently no indicative minimum requirement for how many additional homes Glemsford will be asked to deliver. Work on the preparation of Part 2 of the Joint Local Plan, covering the distribution of housing growth and the allocation of sites is ongoing. As such, there is no strategic planning policy in place in terms of Glemsford's position in the District settlement hierarchy or any planning housing growth.

# Vision and objectives for the GNP

## Vision

2.6 The GNP looks forward to 2037 with the following vision:

*“In 2037 Glemsford will be a place that has retained its village characteristics set in a high-quality landscape where services and facilities meet the day to-day needs of residents and new development has protected and enhanced the historic and natural environment.”*

## Objectives

2.7 To deliver the Vision, the following theme-based objectives have been developed by the Parish Council, against which specific planning policies are framed:

- Ensure that the amount, size and tenure of new housing in Glemsford meets locally identified needs.
- Enable opportunities for the provision of affordable housing that meets the needs of those with a connection to Glemsford.
- Maintain and improve employment opportunities that do not result in detrimental impacts on local infrastructure, the environment and residents' amenity.
- Improve opportunities for home working.
- Protect and enhance the rural setting of the Parish and minimise the impact of development on the natural environment.
- Maximise opportunities to improve natural habitats and biodiversity.
- Recognise and protect the importance of Glemsford's historic assets and their settings.
- Ensure that new development is designed in a way that reflects local character.
- Minimise the impact of new development on infrastructure, services and existing residents.
- Protect and improve the range of community facilities and services.
- Support and encourage safe and sustainable transport, including walking, cycling and public transport.
- Minimise the impact of vehicles on the environment.

## 3. What is the scope of the SEA?

### Summary of SEA scoping

- 3.1 The SEA Regulations require that: “When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”.
- 3.2 In England, the consultation bodies are Natural England, the Environment Agency, and Historic England. These authorities were consulted on the scope of the SEA in May 2024.
- 3.3 The purpose of scoping was to outline the ‘scope’ of the SEA through setting out the following information:
  - A context review of the key environmental and sustainability objectives of national, regional, and local plans and strategies relevant to the GNP.
  - Baseline data against which the GNP can be assessed.
  - The key sustainability issues for the GNP; and
  - An ‘SEA Framework’ of objectives against which the GNP can be assessed.
- 3.4 Further information on the scope of the GNP, alongside the full SEA framework as consulted on, is presented in Appendix B.
- 3.5 The comments provided by the consultees on the GNP SEA Scoping Report, and how they have been addressed, can be read in Table 3.1. It is noted that the Environment Agency did not provide a response to the SEA Scoping Report.

**Table 3.1 Scoping consultation responses**

Consultation response	How the response was considered and addressed
<b>Historic England</b> <b><i>Historic Places Advisor (17<sup>th</sup> May 2024)</i></b>	
<p>We are pleased to see reference to the advice and methodology contained with Historic England's various recommended good practice and advice notes which set 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.</p>	<p>Thank you for your response.</p>
<p>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.</p>	<p>Comment noted, thank you for your response.</p>
<p>We are also pleased to see that Glemsford's local non-designated heritage assets will be included in the assessment, and the Historic Environment Record has and will be further consulted at a higher level. In line with Historic England's advice, we recommend that the HER is consulted rather than the Gateway as this is more likely to be up to date. We are also pleased to see a specific question has been included to consider the effects on the Conservation Area.</p>	

Consultation response	How the response was considered and addressed
<p>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) 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.</p>	<p>Thank you for your response, we have noted this.</p>
<p><b>Natural England</b> <i>Officer (4<sup>th</sup> June 2024)</i></p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made. Strategic Environmental Assessment (SEA) Scoping request: Natural England has no specific comments to make on the scope of this neighbourhood plan's SEA. However, we refer you to the advice in the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.</p>	<p>Thank you for your response. Thank you for providing the linked resource.</p>

## 4. Plan-making and SEA to-date

### Introduction

- 4.1 The ‘narrative’ of plan-making and SEA for the Glemsford Neighbourhood Plan is set out below, including ways in which the Neighbourhood Plan’s development strategy has been shaped by the consideration of reasonable alternatives.
- 4.2 A key element of the SEA process is the appraisal of ‘reasonable alternatives’ for the Neighbourhood Plan. The SEA Regulations are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the “plan and reasonable alternatives taking into account the objectives and geographical scope of the plan”.
- 4.3 The SEA regulations stipulate that the Environmental Report must include:
- An outline of the reasons for selecting the alternatives dealt with;
  - The likely significant effects on the environment associated with alternatives;
  - The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives.

### Establishing reasonable alternatives

#### Why focus on housing?

- 4.4 As discussed in Chapter 2, the draft GNP has been prepared in the context of Babergh and Mid Suffolk District Councils’ local development framework.
- 4.5 There is currently no indicative minimum requirement set through the Babergh and Mid Suffolk Joint Local Plan Part 1 for how many additional homes Glemsford should be seeking to deliver. Updated settlement hierarchy and housing requirement figures are expected in the emerging JLP Part 2.
- 4.6 The draft GNP therefore seeks to take a bottom-up approach to assessing an appropriate level of additional housing that should come forward in Glemsford over the period to 2037. Consideration is given to the local context and community engagement, sustainability of growth, environmental capacity, infrastructure capacity, and local housing need.

#### Local context and community engagement

- 4.7 Given the level of services in the village (GP surgery, shops, and the primary school), there is some expectation that the village should have some housing growth over the next 15 years. A continuation of past rates of growth would result in around 155 new houses in the village between 2022 and 2037.
- 4.8 The Village Survey (2018) did not show support for this level of growth. When asked how many new homes should be built in the village over the next 20 years, the results indicate most support for between 51 and 100 additional homes in the parish. The majority of residents considered that small developments of less than 20 homes per site would be the favoured approach to housing delivery.

## **Sustainability of growth**

- 4.9 As set out in Chapter 2, Glemsford was designated as a “Core Village” in the Babergh Core Strategy (2014) recognising that it provides a range of services and facilities for smaller villages in its hinterland. The Parish Council consider that further managed housing growth will help sustain existing services and employment ensuring the continued sustainability of the village.

## **Environmental capacity**

- 4.10 Babergh and Mid Suffolk District Councils’ “Heritage and Settlement Sensitivity Assessment” (2018) noted that there is some capacity for development in Glemsford that would not have a detrimental impact on both the landscape setting of the village and designated heritage assets.

## **Infrastructure capacity**

- 4.11 Any future development will need to have regard to the capacity of existing infrastructure and its ability to accommodate additional demand. The Babergh and Mid Suffolk Infrastructure Delivery Plan (September 2020), produced in support of the Joint Local Plan, identified capacity at the GP surgery. Latest published Government information identifies that the Primary School has a capacity of 259 pupils and 249 attending. By way of comparison, in 2021 there were 33 fewer children aged 9 and under living in the village when compared with 2001.

## **Local Housing Needs**

- 4.12 The Neighbourhood Plan seeks to take a positive approach towards the identification of both how much and where future housing development will take place in Glemsford. Census data shows the village had a 20% increase in the number of homes in the twenty years to 2021. If that rate of growth were to be continued to 2037 there would be a further 260 homes in the parish by 2037. As at 1 April 2023 planning permission existed for four new homes in the parish that had yet to be completed.
- 4.13 Going forward, the continued rate of growth achieved over that last 20 years is not considered sustainable given the environmental and infrastructure capacities of Glemsford identified above. However, and in accordance with the current settlement hierarchy of the Local Plan, it is appropriate that opportunities for some additional housing are supported over the lifetime of the Neighbourhood Plan and that the location of these is determined locally.
- 4.14 Accordingly, proposals for the development of infill plots or the redevelopment of previously developed sites will be supported through the Neighbourhood Plan within the Settlement Boundary - where the site is not an active employment, service, or community facility, and are in accordance with planning policies of the wider Neighbourhood Plan, the Joint Local Plan and the NPPF.
- 4.15 However, the Parish Council recognise that it is not possible to predict how many new homes might come forward through infill plots within the Settlement Boundary, although sites have continued to come forward over the years, the opportunity for new sites has diminished as sites are developed. The Neighbourhood Plan therefore seeks to support a level of further housing development, coming forward in a planned way through housing site allocations.

## Site options

- 4.16 The identification of sites potentially in contention for allocation through the GNP was led by the Parish Council, with support from AECOM (through a 'Site Options Assessment (SOA)' technical support package).<sup>6</sup>
- 4.17 The assessment considered sites identified in the Glemsford Neighbourhood Plan Area through:
- The Babergh and Mid-Suffolk Strategic Housing and Economic Land Availability Assessment (SHELAA) 2017 and the SHELAA 2019 revision;
  - Planning applications pending consideration; and
  - Sites identified by the Neighbourhood Plan Group through a local "call for sites" exercise.
- 4.18 A final total of eleven sites were assessed for suitability and availability for allocation in the Neighbourhood Plan. The AECOM SOA Report concludes that seven of the eleven sites are not appropriate for housing allocation due to significant constraints which cannot be mitigated. These sites were therefore ruled out by the Parish Council for allocation through the GNP.
- 4.19 The remaining four sites were considered to be potentially suitable for development if identified issues could be resolved or mitigated against. These sites have subsequently been carried forward for further consideration.
- 4.20 The four 'potentially suitable' sites are listed below and shown in Figure 4.1 overleaf. These sites form the reasonable alternatives (housing site options) for assessment through the SEA:
- **Site 1:** Land east of Duffs Hill (25-30 homes)
  - **Site 2:** Land west of Duffs Hill (10 homes)
  - **Site 3:** Land west of Park Lane (100 homes)
  - **Site 4:** Land south-east of George Lane (20-30 homes)
- 4.21 These four sites contribute to two options that could meet the desired housing growth figure of between 51 and 100 homes:
- **Option A:** Site 1, Site 2, and Site 4 combined.
  - **Option B:** Site 3.

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<sup>6</sup> AECOM (2020) Glemsford Neighbourhood Plan Site Options Assessment

Figure 4.1 Reasonable alternative site options



## 5. Assessing reasonable alternatives

### Introduction

- 5.1 This chapter provides the detailed findings of the assessment of the two alternative spatial strategy options within Glemsford (established in the previous chapter). The options are as follows:

Site	Option A	Option B
Site 1: Land east of Duffs Hill	25-30	
Site 2: Land west of Duffs Hill	10	
Site 3: Land west of Park Lane		100
Site 4: Land south-east of George Lane	20-30	
<b>Total dwellings</b>	<b>55-70</b>	<b>100</b>

### Methodology

- 5.2 For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability topics and objectives identified through scoping (see Appendix B) as a methodological framework. Green shading is used to indicate significant positive effects, whilst red shading is used to indicate significant negative effects, however this is also stated in the text. Where appropriate, neutral effects, or uncertainty will also be noted. Uncertainty is noted with grey shading.
- 5.3 Every effort is made to predict effects accurately; however, where there is a need to rely on assumptions to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.
- 5.4 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.
- 5.5 Finally, it is important to note that effects are predicted considering the criteria presented within the Regulations. So, for example, account is taken of the duration, frequency, magnitude, likelihood and reversibility of effects.

## Biodiversity

**Table 3.1 Appraisal Findings (Biodiversity)**

Discussion of Potential Effects and Relative Merits of Options	Rank	
	Option A	Option B
<p>There are no international designations in proximity to the neighbourhood area, however there are two Special Sites of Scientific Interest (SSSIs) in proximity to the site options. These are Kentwell Woods SSSI and Glemsford Pits SSSI. Kentwell Woods SSSI is within 1km of Sites 1 and 4 (<b>Option A</b>) and Site 4 (<b>Option B</b>), and Glemsford Pits SSSI is 1.1km from Site 4. Due to the lower level of growth dispersed across three sites through <b>Option A</b>, sites are not affected by the SSSI Impact Risk Zone (IRZ). However, development under <b>Option B</b> would require consultation with Natural England as site 3 seeks to deliver 100 homes, which exceeds the SSSI IRZ threshold of 50 dwellings.</p> <p>None of the options are constrained by Biodiversity Action Plan (BAP) Priority Habitat. However, Site 2 (<b>Option A</b>) is directly adjacent to an area of deciduous woodland along the southeastern boundary of the area. Given the proximity of the habitat to the site, it is possible development through <b>Option A</b> could cause disturbance to biodiversity through increased noise and light pollution. None of the remaining options are constrained in this respect.</p> <p>The Living England Habitat Map shows the extent and distribution of broad habitat types across England. All sites include arable and horticultural land, with smaller areas of acid, calcareous and neutral grassland across their areas. As such, development through all options would impact upon these broad habitat types – development would be unable to be focused away from them. It is recognised that proposals for larger scale development provide an increased opportunity to integrate green infrastructure to boost local networks, helping to restore and connect habitats so that species can thrive. In this context, <b>Option B</b> performs particularly positively, as it seeks to deliver 100 homes on one large greenfield site.</p> <p>Both options have the potential to lead to adverse effects, reflecting the Priority Habitat adjacent to Site 2 (<b>Option A</b>) and the SSSI Impact Risk Zone (IRZ) affecting Site 3 (<b>Option B</b>). Residual effects are likely to be of greater significance under <b>Option B</b>, given the scale of development proposed and the national importance of the SSSI. However, <b>Option B</b> also presents an increased opportunity to deliver environmental enhancements on-site, reflective of the proposed scale of growth. As uncertainty exists in this respect at this stage, <b>Option A</b> is considered the best-performing.</p>	1	2

## Climate change (including flood risk)

**Table 3.2 Appraisal findings (Climate change [including flood risk])**

Discussion of Potential Effects and Relative Merits of Options	Rank	
	Option A	Option B
<p>Neither option is constrained by fluvial flood risk, given the distance of the sites from nearby waterbodies. However, the sites that make up <b>Option A</b> are marginally constrained by surface water flood risk. Site 1 has a medium risk of flooding adjacent to the southwestern border of the area, and Site 2 has some medium and high levels of risk through the southwest area of the site due to drainage pattern of the site. Site 4 has some small areas of medium flood risk adjacent to the northern boundary of the site.</p> <p>It is recognised that climate change is a global issue, and within the context of the Neighbourhood Plan area, the effects under both options are not likely to be significant. However, consideration is given to the constraints and opportunities provided by the different scales of growth proposed. <b>Option A</b> will make a smaller contribution to emissions from the built environment (through the delivery of three small sites totalling up to 70 homes), while large growth <b>Option B</b> (100 homes on one site) presents an increased opportunity to deliver development that adopts low carbon technologies and can help reduce emissions in the longer term.</p> <p>Increased growth in Glemsford under both options is likely to exacerbate congestion and strain the capacity of roads within the village centre. This could lead to higher emissions in the Glemsford area, which would have a minor negative impact on climate change mitigation. Consequently, it is essential to focus on reducing per capita emissions by promoting lower domestic energy use and encouraging the adoption of renewable energy sources. Whilst these impacts are unlikely to be significant, <b>Option B</b> notably presents an opportunity to deliver positive effects in relation to movement and access (ie linkage to the settlement centre and active travel).</p> <p><b>Option B</b> (Site 3) connects well to the settlement centre and presents opportunities associated with increased scale of growth to support pedestrian links and cycle travel within the site and to the village centre, with pedestrian links (and a 5 minute walking distance) to the village centre provided to the west of the site and located alongside Park Lane, providing good access to the settlement centre via road. Whereas sites within <b>Option A</b> are dispersed further around the settlement and are less likely to deliver active travel provision and network improvements, given the low level of growth.</p>	2	1

In conclusion, **Option B** performs more favourably than **Option A** due to the lack of flood risk constraints in the area, as well as being located closer to the village centre than **Option A**. Further, **Option B** provides more opportunities through the increased scale of growth.

## Community wellbeing

**Table 3.3 Appraisal findings (Community Wellbeing)**

Discussion of Potential Effects and Relative Merits of Options	Rank	
	Option A	Option B
All four sites are located adjacent to the settlement boundary and in proximity to existing residential development. Consequently, development through either option is anticipated to integrate well into the existing community. However, <b>Option B</b> , which focuses on a singular, larger growth site on the edge of the settlement, offers distinct advantages over smaller, spatially distributed sites. It is likely to provide enhanced community infrastructure that supports both the current residents and those of the new development. This larger, higher growth site under <b>Option B</b> allows for better integration and promotes community wellbeing through the provision of new green spaces, play areas, improved active travel links, and affordable housing opportunities. Therefore, in this context, <b>Option B</b> is considered the best-performing option.	2	1

In terms of accessibility to the village centre, Sites 1 and 2 (**Option A**) are located alongside Duffs Hill, a single-track road, which primarily allows access via Brook Street to the settlement centre. Site 4 is located alongside Flax Lane, which is a narrow single-track road, and links to Skate's Hill, which directly adjoins the A1092. **Option B** (Site 3) is located along Park Lane, which is a wider road that directly leads into the settlement centre. All sites have Public Rights of Way (PRoWs) within proximity and adjacent to their boundaries, that allow for good access to the village centre. PRoWs also present an opportunity to enhance active travel connectivity within and surrounding the neighbourhood area. However, **Option B** presents opportunities with relation to delivering accessibility improvements given the scale of growth proposed at the singular site on the village edge.

While both options are favourable in terms of accessibility to local services and facilities in Glemsford, **Option B** performs slightly better than **Option A**. This is because Site 3 (**Option B**) is the best positioned of all of the sites for accessing services and facilities in Glemsford village and the surrounding areas. **Option B** could also present an opportunity to deliver improvements to local facilities and services in the village given the scale of growth proposed at the site. Whilst this is unlikely to be significant, this could include playing fields or service upgrades to benefit the local community.

Overall, **Option B** performs as the much more favourable site with regard to community wellbeing. Whilst **Option A** also has merits and would be likely to have significant positive effects for the community, **Option B** presents increased opportunities to support sustainable growth of the community, focusing growth in a location that supports accessibility and promotes healthy lifestyles.

## Historic environment

**Table 3.4 Appraisal findings (Historic Environment)**

Discussion of Potential Effects and Relative Merits of Options	Rank	
	Option A	Option B
In relation to historic environment constraints, Site 1 ( <b>Option A</b> ), is adjacent to the Glemsford Conservation Area along the southern boundary, while Sites 2 and 4 ( <b>Option A</b> ) are within close proximity. The Glemsford Conservation Area Appraisal identifies the intrinsic qualities of buildings in the area, and highlights the importance of visual amenity linked to green areas and the rural quality of the village. Given all three sites are greenfield in nature, development could adversely impact upon the important qualities identified above, particularly in relation to the conservation area's setting.	2	1
Site 1 ( <b>Option A</b> ) is also in proximity to three listed buildings to the south and north of the site, which includes one that is Grade II* listed. Without mitigation, development at this site has the potential to impact on the setting of these important heritage features, notably affecting views to and from the conservation area and listed buildings. However, effects have the potential to be reduced by screening provided by existing built form.		
<b>Option B</b> is not considered to be constrained by heritage assets.		
Considering the above, <b>Option B</b> performs well while <b>Option A</b> , without mitigation, could lead to negative effects on heritage assets. However, given that <b>Option A</b> supports low levels of growth across multiple sites, residual effects are likely to be minor. A level of uncertainty does however exist at this stage.		

## Landscape

**Table 3.5 Appraisal findings (Landscape)**

Discussion of Potential Effects and Relative Merits of Options	Rank	
	Option A	Option B
All options are greenfield in nature and located adjacent to the settlement boundary. As such, any development could impact upon the rural countryside outside of the settlement, and therefore setting, rural feel, and landscape sensitivity will need to be considered.	2	1
<p>The location of sites to the north (Site 1 and Site 2 within <b>Option A</b>), south (Site 4 within <b>Option A</b>) and east (Site 3 within <b>Option B</b>) of the settlement, outside of the settlement boundary, could set precedent for further development into the rural countryside. This could lead to adverse effects on the local landscape in the longer term, altering the settlement pattern and the wider rural nature of the parish. Consideration is also given to the size of the greenfield sites in the context of the village, with <b>Option A</b> being made up of three smaller sites (Site 1 – 1.29 ha, Site 2 – 4.02 ha, and Site 4 – 2.8 ha) and <b>Option B</b> composed of a single site of 11.4ha. It could be argued that the combination of smaller, piecemeal sites on the village edge will have a reduced effect on the landscape, while Option B would see a significant change to the existing settlement. However uncertainty exists at this stage, and it is recognised that all sites are likely to be supported by landscape led masterplanning.</p> <p>Options are considered to perform equally and cannot be differentiated between at this stage. This reflects the large greenfield nature of Site 3 (<b>Option B</b>) outside of the settlement boundary. Both options are considered to have potential for significant negative effects without mitigation.</p>		

## Land, soil, and water resources

**Table 3.6 Appraisal findings (Land, soil and water resources)**

Discussion of Potential Effects and Relative Merits of Options	Rank	
	Option A	Option B
<p>All sites are greenfield, and therefore will result in a permanent loss of greenfield land outside of the settlement boundary. Regarding the location of the Best and Most Versatile agricultural land (Grade 1 to 3a), a detailed agricultural land classification (ALC) assessment has not been undertaken within the neighbourhood area. The provisional ALC dataset is therefore relied upon, which indicates that Site 3 (<b>Option B</b>) and Site 4 (<b>Option A</b>) are underlain by Grade 2 'Very Good' agricultural land. Sites 1 and 2 (<b>Option A</b>) to the north of the village are partially underlain by Grade 2 land, however also partially Grade 3 'Good to Moderate' agricultural land in the south of the area (however, without a specific agricultural land classification it is not possible to differentiate between Grade 3a and Grade 3b, where Grade 3a is considered 'best and most versatile', and Grade 3b is not). Despite this, development through either option is likely to lead to permanent loss of greenfield, high quality agricultural land with the potential for residual significant negative effects. <b>Option B</b> is considered to be the worst performing of the options, reflective of the size of the site.</p> <p>All sites fall within a Minerals Consultation Area, which means that development through either option is likely to require consultation with Suffolk County Council. All sites also fall within a Nitrate Vulnerable Zone (NVZ), as well as a Zone 3 groundwater Source Protection Zone (SPZ). However, it is recognised that there is mitigation available through national policy to ensure that there are no residual significant effects.</p> <p>Overall, it is considered that all options will result in the loss of greenfield and agricultural land, leading to significant negative effects. In terms of ranking the options, <b>Option B</b> performs more poorly of the two options due to the larger loss of greenfield land, and <b>Option A</b> is partially underlain by Grade 3 land instead of Grade 2.</p>	2	1

## Transportation

**Table 3.7 Appraisal findings (Transportation)**

Discussion of Potential Effects and Relative Merits of Options	Rank	
	Option A	Option B
<p>Although outside of the settlement boundary, all options are considered to be within a reasonable walking distance of the local services and facilities the settlement provides. In terms of access to public transport, all of the sites perform equally, having good access to a local bus stop and being an equal distance from the closest train station in Sudbury (6km away).</p> <p>In light of the above it is recognised that there will likely be a continued reliance on the private vehicle for journeys outside of the village (and within, to an extent). The B1085 that runs through the centre of the settlement is understood to currently face congestion issues, particularly with regard to Hunts Hill due to on-street parking. It is likely that any additional growth under either option will place increased pressures on congestion and capacity on roads. It is also likely that a higher level of growth will increase pressure with regard to private vehicles, which would suggest Option A is favourable in this regard. However, <b>Option B</b> being a singular, large site presents an opportunity to deliver transport improvements to meet the needs of new and existing residents. This could include improved access roads, pedestrian and cycle links/ crossings, on-site parking, etc.</p> <p>All sites are well connected to the existing highway network, and therefore site access should not pose a significant issue for either option. However, pedestrian access to Site 4 (<b>Option A</b>) is currently somewhat constrained due to the lack of existing pavement access adjacent to the proposed site. Moreover all sites within <b>Option A</b> are located on small roads (Duffs Hill, and Flax Lane) that may struggle to support a significant amount of new vehicle movement arising from new development. <b>Option B</b> is therefore best performing in terms of accessibility.</p> <p>Considering the above, <b>Option B</b> is best performing. This reflects the opportunities associated with the site to best facilitate improved accessibility, sustainable travel use, and modal shift. Site 3 (<b>Option B</b>) is also well located close to the settlement centre, and will likely have capacity to support the increase in vehicles through appropriate masterplanning. Nonetheless, minor negative effects are likely to be seen through both options reflective of the growth proposed on the settlement edges, and existing congestion issues. Uncertainty exists in terms of residual effects at this stage without further detail relating to design and layout of site options.</p>	2	1

## Summary findings and conclusions

SEA Theme		Option A	Option B
Biodiversity	Significant effect?	No	Yes - uncertain
	Rank	1	2
Climate change (including flood risk)	Significant effect?	No	No
	Rank	2	1
Community wellbeing	Significant effect?	Yes - positive	Yes - positive
	Rank	2	1
Historic environment	Significant effect?	Yes - negative	No
	Rank	2	1
Landscape	Significant effect?	Yes - negative	Yes - negative
	Rank	= 1	= 1
Land, soil and water resources	Significant effect?	Yes - negative	Yes - negative
	Rank	1	2
Transportation and movement	Significant effect?	Yes – negative	Yes – uncertain
	Rank	2	1

- 5.6 Overall, a number of potential significant effects have been identified. Significant positive effects have been identified for both options with regard to community wellbeing, which represents the options contributing additional housing to meet the local needs. **Option B** ranks the most favourably for this theme for a number of reasons, including the potential to improve accessibility, opportunities to provide community facilities and improve existing ones, as well as integration into the community.
- 5.7 Uncertain significant effects were identified in relation to biodiversity for **Option B**. This is due to development through this site providing opportunities to develop green infrastructure, however the site is in proximity to an SSSI and is delivering a large level of growth, which could impact the asset. For this SEA theme, **Option A** was found to perform more favourably. Uncertain significant effects were also found for transportation through **Option B**, due to the

potential that this site has to both increase congestion within the area, but also improve sustainable transport links.

- 5.8 Significant negative effects were found for both options with regard to landscape and land, soil and water resources, which represents the fact that development through either option will result in a loss of greenfield land, and of 'best and most versatile' agricultural land. Further, significant negative effects were found to be likely through **Option A** in relation to historic environment, and transportation and movement. This is due to the location of Site 1 which is adjacent to the conservation area and listed buildings, as well as the roads which the sites are on being unlikely to support an increase in private vehicles.
- 5.9 **Option B** was found to rank more favourably in most themes, except for in biodiversity and land, soil and water resources, as well as landscape, in which it ranked equally with **Option A**.

## 6. Establishing the preferred approach

- 6.1 The reasons for selection and rejection of the four reasonable alternative site options assessed in Chapter 5 has been set out below. This has been provided by Glemsford Parish Council:

### **Site 1: Land east of Duffs Hill**

- 6.2 The site has an area of 1.29 hectares and a capacity of between 25 and 30 dwellings. It would be accessed off Duffs Hill, a single-track road and may not be able to support a significant amount of new vehicle movement arising from new development. There are listed buildings in close proximity to the site and development could have a detrimental impact on the setting of these heritage assets. The Glemsford Site Options and Assessment (2020) concluded that it would only be suitable for a limited amount of development.

### **Site 2: Land west of Duffs Hill**

- 6.3 The site has an area of 4.02 hectares but only the frontage was considered possibly suitable for housing when assessed both by Babergh District Council in their Strategic Housing and Employment Land Availability Assessment (2019). As with Site 1, the site would be accessed from Duffs Hill which would be unsuitable for significant increases in traffic. The Glemsford Site Options and Assessment (2020) concluded that it would only be suitable for a limited amount of development.

### **Site 3: Lane west of Park Lane**

- 6.4 The site has an area of 11.4 hectares and is centrally located close to existing services and facilities with only minor physical constraints. Park Lane is a two-way road with direct access to the A1092. Pedestrian links to the services and facilities of the village centre could be provide via The Pippins and via Drapery Common. The Glemsford Site Options and Assessment (2020) concluded that the site had the potential to create an urban extension that might also include additional physical, social and green infrastructure. Structural screening would need to be planted along the southern and eastern boundaries to reduce the visual impact on the surrounding countryside.

### **Site 4: Land south-east of George Lane**

- 6.5 The site has an area of 2.8 hectares and would have to be accessed via Flax Lane which is a narrow single track road that would be unsuitable for significant increases in traffic. Pedestrian links to the services and facilities of the village centre could be provide via George Lane and via Long Pastures. Development on the site has the potential to impact on the nearby Conservation Area. Structural screening would need to be planted along the southern and eastern boundaries to reduce the visual impact on the surrounding countryside. The Glemsford Site Options and Assessment (2020) concluded that the site had some potential for development.

## Previous assessment of the GNP

- 6.6 It should be noted that the iterative nature of plan making and SEA has given rise to opportunities for the SEA to appraise an earlier version of the plan and make recommendations accordingly. This is a key function of the SEA, i.e. reflects the need for SEA to 'inform and influence' the plan making process. Consequently, the submission version of the plan incorporates a number of amendments recommended by the SEA.

## 7. Appraisal findings at this stage

### Introduction

7.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current 'submission' version of the Glemsford Neighbourhood Plan. This chapter presents:

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

### GNP policies

7.2 The Glemsford Neighbourhood Plan contains 13 policies, listed below in Table 7.1:

**Table 7.1 GNP policies**

Policy number	Name
GLEM1	Spatial Strategy
GLEM2	Housing Delivery
GLEM3	Land west of Park Lane
GLEM4	Affordable Housing on Rural Exception Sites
GLEM5	Employment Sites
GLEM6	New Businesses and Employment
GLEM7	Protection of Landscape Setting of Glemsford
GLEM8	Protection of Important Views
GLEM9	Biodiversity
GLEM10	Local Green Spaces
GLEM11	Development Design
GLEM12	Artificial Lighting
GLEM13	Public Rights of Way

## Methodology

- 7.3 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see Table 3.1) as a methodological framework.
- 7.4 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.
- 7.5 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. These effect 'characteristics' are described within the assessment as appropriate. 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. Policies are considered as a whole when determining significance, but there is no need to systematically appraise policies individually.

## Appraisal of the GNP

### Plan contents, aims, and objectives

- 7.6 The GNP's spatial strategy is defined through Policy GLEM1 (Spatial Strategy), which seeks to ensure that development will be focused within the settlement boundary which is identified within the plan. It also seeks to ensure that the countryside surrounding the settlement boundary will be protected and enhanced, with any development minimising impacts on the landscape or best and most versatile land. Within the defined settlement boundary, Policy GLEM3 (Land west of Park Lane) allocates the 'Land west of Park Lane', a site of 11.4 hectares for 100 dwellings and recreational open space.
- 7.7 The GNP splits policies up into five themes covering housing, employment, natural environment, built and historic environment, and travel. Housing policies seek to meet the local housing need; provide housing that is a mix of size, tenure, and type (including affordable housing); and support affordable housing on rural exception sites outside of the settlement boundary provided there is a proven local need.
- 7.8 Employment policies seek to retain and develop existing employment and other business uses, whilst protecting the landscape, environment and community of the area. The policies provide support for proposals for new business development within the settlement boundary, and outside the settlement boundary provided that the proposal is related to small scale leisure or tourism activities of a scale and nature that is fitting of the countryside. The policies

further support the redevelopment of existing buildings, or previously developed land, of an appropriate scale and size.

- 7.9 Natural environment policies seek to maintain the neighbourhood area's countryside and unique scenic beauty; as well as the neighbourhood area's landscapes, biodiversity, and cultural artifacts; and identify, protect and enhance the neighbourhood area's Local Green Spaces (LGS).
- 7.10 Built and natural environment policies seek to ensure that new development proposals within the area reflect the local characteristics and contribute to a safe and sustainable environment; and ensure that light pollution is kept to a minimum so as to maintain night-time dark skies and reduce glare.
- 7.11 Finally, Policy GLEM13 (Public Rights of Way) falls under the travel theme. This policy seeks to improve and extend the neighbourhood area's Public Rights of Way (PRoW), whilst incorporating measures to enhance biodiversity where possible.

## Biodiversity

- 7.12 In terms of the site allocation, Kentwell Woods SSSI is within 1km of Land west of Park Lane. Development of 100 homes at the site exceeds the SSSI Impact Risk Zone threshold of 50 dwellings, however, Natural England have not identified any issues with the site in consultation to date. The site allocation policy (GLEM3) outlines that the development of the site should be undertaken in accordance with the Development Principles of the GNP. These include incorporating green infrastructure measures such as new green space, integrating existing features such as hedgerows and trees, and new tree planting.
- 7.13 Glemsford is rich in local ecological networks, including BAP Priority Habitats, which have the potential to be impacted by new development which comes forward within the neighbourhood area. In line with Policy GLEM9, acceptable development proposals will only be supported where they provide biodiversity net-gain in line with national policy (the Environment Act mandates that all qualifying schemes secure a net gain of 10%). Specifically, Policy GLEM9 adds that this could include the creation of new natural habitats, planting of native trees, and restoring and repairing fragmented biodiversity networks.
- 7.14 Also of relevance to biodiversity is Policy GLEM10, which identifies important open areas within the village. GLEM10 designates these specific areas as Local Green Space (LGS), and by doing this recognises and protects land that is not only significant to the community, but also essential for maintaining ecological diversity. The policy aligns with the National Planning Policy Framework (NPPF) by ensuring these areas are safeguarded from development except under exceptional circumstances. This preservation effort is integral for maintaining local biodiversity, as it protects habitats for various species and maintains the ecological functions these green spaces support.
- 7.15 Overall, the draft Glemsford NP is not considered likely to lead to any significant effects with regards to biodiversity. Whilst the site allocation is relatively big, and within proximity of an SSSI, no issue with development at this scale has been raised by Natural England through consultation to date. Further, other than being within 1km of an SSSI, the site allocation avoids areas of high

biodiversity value, and the wider policy framework provides additional protections for biodiversity. **Minor positive effects** are therefore concluded as most likely at this stage – particularly due to those measures that provide additional protections for biodiversity.

## Climate change (including flood risk)

- 7.16 The neighbourhood area is partially affected by areas at high risk of fluvial flooding (Flood Zone 3) and surface water flooding. These areas are broadly found along the Glemsford's borders although there are pockets of high surface water flood risk found throughout the neighbourhood area (including Glemsford village). The site allocation is not constrained by flood risk and development would be directed by the policies of the Local Plan and NPPF with regards to flood risk.
- 7.17 The site allocation 'Land west of Park Lane' performs positively to some extent in relation to climate objectives. The delivery of 100 homes at one site presents an opportunity to deliver development that adopts low carbon technologies, as well as in the building process, and can help reduce emissions in the longer term. The site allocation policy incorporates green infrastructure, such as requiring five hectares of new green space and extensive tree planting which should contribute to carbon sequestration and create natural buffers. The policy's emphasis on phased development and maintaining low-rise, eco-friendly buildings minimizes environmental disruption and promotes energy efficiency. Collectively, these measures seek to ensure that development is resilient to climate impacts.
- 7.18 However, 100 new homes in Glemsford are likely to exacerbate congestion and strain the capacity of roads within the village centre to some degree. This could lead to higher emissions in the Glemsford area, which could have a minor negative impact on climate change mitigation. Consequently, it is essential to focus on reducing per capita emissions by promoting walkable local journeys, lower domestic energy use and encouraging the adoption of renewable energy sources.
- 7.19 With the above in mind, the draft GNP seeks to maximise opportunities for local renewable energy and electric vehicle infrastructure development, as well as new green infrastructure and improved ecological links, to support climate resilience. Policy GLEM11 is noteworthy in this respect, as it seeks to ensure that new development proposals in the area provide measures such as adequate provision for cycle storage, and electric vehicle charging points where off-street residential parking is created.
- 7.20 Further, the site allocation presents an opportunity to deliver positive effects in relation to movement and access (i.e., linkage to the settlement centre and active travel). This is reflected through the site allocation policy, which seeks to ensure that pedestrian and cycle links should be provided to adjoining paths to encourage active travel to the village centre. Further, ensuring a safe crossing across Park Lane, to enable improved linkage into the PRoW.
- 7.21 Reflecting on the above, **broadly neutral effects** are considered most likely through the draft GNP with regard to climate change and flood risk. The allocation site avoids significant impacts in terms of flood risk, and is suitably located to maximise opportunities for walking and cycling in local journeys. As

the village is not particularly well connected by public transport, baseline trends that favour the private car in longer journeys are likely to continue.

## Community wellbeing

- 7.22 The site allocation is within walking distance of the village centre, a bus stop, green space, Glemsford Primary Academy School and Nursey, and various other services and facilities located centrally. Therefore, able-bodied residents are likely to walk or cycle to access these amenities, services, and facilities. This is further helped within Policy GLEM3, the site allocation policy, which states that the site will be linked to existing paths and PRoW.
- 7.23 Further, the site allocation policy also allocates the sustainable development of 100 homes, emphasizing community integration and wellbeing. By phasing construction into two stages, it mitigates the impact on local services. Access is streamlined with road entry from Park Lane and extended speed limits for safety. The policy also requires the creation of over five hectares of green spaces and recreational areas, enhancing local amenities. Moreover, the policy promotes diverse, affordable housing options (with 35% of the development being affordable) and encourages early community engagement, ensuring developments meet local needs and retain the village's character. Overall, the policy fosters a balanced, community-focused expansion that supports both current and future residents.
- 7.24 Complementing GLEM3, Policy GLEM4 supports the development of small-scale affordable housing on rural exception sites outside settlement boundaries, addressing the urgent need for affordable homes where market prices are prohibitive. This policy ensures such housing remains perpetually affordable and prioritizes residents with local connections. The inclusion of some market homes is permitted only to fund the affordable units, ensuring the primary focus remains on affordable housing. These developments are required to blend seamlessly with the rural character, enhancing community cohesion and providing critical housing support for the village's long-term sustainability. Considering this, both GLEM3 and GLEM4 perform positively with respect to community wellbeing.
- 7.25 While deprivation is low overall, the neighbourhood area (2019) is shown to be more highly deprived in the Education, Skills and Training domain, and Income Deprivation Affecting Children Index domain; with LSOA Babergh 002B falling within the 30% most deprived LSOAs nationally. Policies GLEM5 (Employment Sites) and GLEM6 (New Businesses and Employment) perform positively in terms of supporting access to employment. These policies collectively enhance community wellbeing by fostering sustainable economic growth while preserving the area's character and quality of life. Policy GLEM6 encourages new business development within appropriate locations, promoting job creation and local services without compromising residential and environmental standards. Meanwhile, Policy GLEM5 ensures the retention and responsible development of existing employment sites, balancing economic needs with community and environmental protection. Together, these policies support a vibrant, resilient local economy, providing opportunities for employment and business growth, while safeguarding the rural and historic character of the neighbourhood area.

- 7.26 In terms of the wider policy framework, Policy GLEM10 and GLEM13 perform positively by identifying and designating ten Local Green Spaces (LGS) and extending PRow networks in the neighbourhood area. The LGS that are designated in Policy GLEM10 include allotments, playing fields, play areas, and open spaces. Designated LGS in the neighbourhood area will foster community wellbeing by preserving essential areas for recreation, relaxation, and social interaction. These green spaces provide accessible venues for physical activities, mental relaxation, and community gatherings. By safeguarding these spaces, the policy promotes healthier lifestyles, enhances community cohesion, and enriches the quality of life for all residents.
- 7.27 In conclusion, the draft GNP is considered likely to lead to **significant positive effects** in relation to community wellbeing objectives. This is through the delivery of housing in a sustainable location that meets, as well as enhances community infrastructure both with relation to active travel networks and green spaces. Further, with relation to protecting and enhancing the local economy.

## Historic environment

- 7.28 The neighbourhood area includes numerous heritage assets, including Glemsford Conservation Area which extends throughout the village core. Policy GLEM11 (Development Design) therefore seeks to ensure any development that comes forward during the plan period is sensitive to the historic setting of the neighbourhood area in terms of design and layout. Moreover, Policy GLEM2 (Housing Delivery) also seeks to ensure that any proposals for conversion of redundant/disused agricultural barns conserves the character and historic interest of the building.
- 7.29 The site allocation is not constrained by designated nor non-designated heritage assets. However, the large scale of the site presents a constraint, making it potentially challenging to integrate with the surrounding environment while reflecting the historic character of the settlement. The site allocation policy seeks to safeguard the historic environment by stipulating low-rise building designs that preserve scenic views and village character. By integrating structured landscaping, the policy maintains the visual integrity and historic character of the area. This approach supports sustainable growth while respecting the heritage that contributes to the village's identity.
- 7.30 Finally, Policy GLEM12 could help to preserve the historic environment by minimizing light pollution, thereby protecting the night-time character and ambience of historic village settings. By promoting efficient lighting that reduces glare and energy consumption, the policy ensures that new developments do not detract from the visual integrity and aesthetic value of heritage sites and landscapes.
- 7.31 Overall, the draft GNP is not considered likely to lead to any significant effects with regards to the historic environment. Whilst not significant, it could be concluded that there could be **minor negative effects** given the scale of growth coming through the site allocation. However, the site allocation does not contain or lie adjacent to any designated or non-designated heritage assets. In addition, the policy framework seeks to reduce the impact of development on historic character so **neutral effects** could also be achievable. It is recognised that the overall design and layout of the resultant development will determine such residual effects.

## Landscape

- 7.32 In terms of the delivery of housing in the neighbourhood area, Policy GLEM2 indicates the plan's support of infill development, and development of small brownfield 'windfall' sites. This has positive effects for the local landscape, as it seeks to focus development within the defined settlement boundary, which is a less sensitive part of the neighbourhood area. It also lowers the potential for impacts to the landscape through changes to views and loss/damage to important landscape features.
- 7.33 The site allocation is 11ha in size and greenfield in nature, located adjacent to the settlement boundary. As such, development of the site has the potential to significantly impact upon the rural countryside outside of the settlement. This could lead to adverse effects on the local landscape in the longer term, altering the settlement pattern and the wider rural nature of the parish, particularly given the size of the greenfield site in the context of the village. In response to this, Policy GLEM3 states that, amongst other criteria, development should preserve views towards the surrounding landscape with low-rise buildings, and structured landscaping.
- 7.34 The Glemsford Landscape Character Appraisal (GLCA) serves as crucial evidence in the Neighbourhood Plan, highlighting significant erosion of the area's landscape character due to recent development, including large housing estates and alterations like hedgerow removal and field merging. Policy GLEM7 emphasizes the preservation of Glemsford's rural and landscape character through responsible development practices. It requires that proposals consider local landscape character and scenic beauty as outlined in the GLCA, ensuring new buildings and developments outside settlement boundaries blend harmoniously with their surroundings. Concurrently, Policy GLEM11 aims to mitigate these challenges by requiring detailed landscape character appraisals and adherence to design guidelines. This should ensure that new development respects and enhances local characteristics, protects historic and ecological features, and contributes positively to the preservation of Glemsford's natural and cultural heritage.
- 7.35 In terms of the wider draft GNP policy framework, Policy GLEM8 seeks to ensure the preservation of significant vistas identified in the Neighbourhood Plan Assessment of Views. In line with this policy, development proposals must avoid visually impacting key landscape and built development features visible from public vantage points within or around Glemsford. Further, Policy GLEM12 also supports the local landscape, by supporting the conservation of Glemsford's dark night skies and natural biodiversity, enhancing the overall quality of the landscape. The same can be said for Policy GLEM10 which seeks to designate and safeguard Local Green Spaces.
- 7.36 In conclusion, **minor negative effects** are anticipated through the draft GNP. This reflects the expected impact through greenfield development; however, these effects are minimised by the supporting policy framework. Specifically, the landscape considerations under Policy GLEM3 and GLEM11 which should help to mitigate any adverse effects, and the wider considerations of the plan which includes the protection of key views (Policy GLEM8) and the maintenance of dark night skies and green features (Policy GLEM12 and GLEM10).

## Land, soil and water resources

- 7.37 The site allocation, Land west of Park Lane, is wholly greenfield, and therefore will result in a permanent loss of greenfield land outside of the settlement boundary. A detailed agricultural land classification (ALC) assessment has not been undertaken for the site, and as such the provisional ALC dataset is relied upon. This indicates that the site is underlain by Grade 2 'Very Good' agricultural land. Development of the site will therefore lead to permanent loss of high-quality agricultural land.
- 7.38 In terms of water resources, neighbourhood area is part of the Anglian River Basin District, specifically within the Essex Combined management catchment and the Stour OC operational catchment. The northern half falls in the Glem-Lower Water Body area, while the southern half is within the Stour (Wixoe - Lamarsh) Water Body area. However, the site allocation is not in proximity to either of these waterbodies. In addition, it is considered that building regulations and design guidelines, local plan policies, and measures taken by water companies will ensure that water is used efficiently, and wastewater sufficiently disposed of, to therefore avoid runoff into nearby drains and waterbodies.
- 7.39 The draft GNP does not contain any specific policies that focus on land, soil and water resources. However, the GNP requires new developments in Glemsford to make provisions for managing surface water run-off. It promotes the use of Sustainable Drainage Systems (SuDS), which help mitigate flood risks, prevent soil erosion, and maintain water quality.
- 7.40 Overall, the draft GNP is considered likely to lead to long-term **minor negative effects** due to the loss of greenfield, as well as best and most versatile agricultural land. However, it is recognised that this is largely unavoidable given the limited availability of brownfield land in the neighbourhood area.

## Transportation

- 7.41 Although outside of the settlement boundary, the site allocation is considered to be within a reasonable walking distance of the local services and facilities the settlement provides. Furthermore, the large-scale development proposed presents an opportunity to deliver transport improvements to meet the needs of new and existing residents. This is reflected through site allocation Policy GLEM3 (Land West of Park Lane) which states that development should include accessible pathways and connections to the public rights of way network ensures seamless integration with existing developments, promoting pedestrian and cyclist mobility. Further, by ensuring that development should incorporate traffic safety measures such as extending the 30mph speed limit and establishing safe crossing points, the policy aims to calm traffic and reduce potential hazards for both pedestrians and drivers.
- 7.42 More widely, in accordance with Policy GLEM13 (Public Rights of Way), where feasible, improvements to the quality and extent of the public rights of way network will be supported where provided as part of development proposals. Public rights of way provide opportunities for active travel including horse riding and cycling.
- 7.43 Policy GLEM11 (Development Design) also performs positively in this respect, facilitating modal shift through the delivery of supporting transport

infrastructure. In line with this policy and where appropriate, proposals should make adequate provision for cycle storage in accordance with adopted cycle parking standards. Furthermore, proposals should seek to ensure permeability through new housing areas, connecting any new development into the heart of the existing settlement.

- 7.44 There are issues of localised congestion in the neighbourhood area, particularly in relation to on-street parking. In line with Policy GLEM11 (Development Design), proposals for new development should produce designs, in accordance with adopted standards, that maintain or enhance the safety of the highway network, ensuring that all vehicle parking is provided within the plot and that spaces and garages meet the adopted minimum size standards.
- 7.45 Overall, requirements set out through the site allocation policy and the wider policy framework seek to allocate a site in a sustainable location, maintain and enhance active transportation provision and provide safe access to the road network, whilst also contributing to additional parking. Recognising that more strategic transport issues (such as high levels of reliance on private vehicles due to low level of sustainable transportation opportunities within the neighbourhood area) are likely to continue and strategic interventions are beyond the scope of the draft GNP, no significant deviations from the baseline are expected but **minor positive effects** are considered likely from focused efforts to improve local connections and active travel opportunities.

## Conclusions and recommendations

- 7.46 Overall, long-term **significant positive effects** are considered likely with regard to the community wellbeing SEA topic. This is because the draft GNP will help meet the local housing need, and seeks to protect and enhance community facilities, employment opportunities, and local green space and the countryside. Combined, these will positively contribute to the quality of life and wellbeing of residents in the neighbourhood area.
- 7.47 **Minor positive effects** are considered likely for the transportation SEA topic through the draft GNP, which reflects the focus of plan policies on safeguarding and extending the existing PRoW network, parking provision, and providing safe access to and from the site allocation for pedestrians, cyclists and vehicles.
- 7.48 **Minor positive effects** are also concluded as most likely in relation to biodiversity predominantly due to policy measures that seek to enhance biodiversity in the area.
- 7.49 **Broadly neutral effects** are predicted for the climate change and flood risk topic. This reflects the unlikely deviation from baseline conditions, linked to the site allocation area, and the policy provisions.
- 7.50 **Minor negative effects** are also considered likely in relation to landscape. This reflects the location of the site adjacent to the settlement boundary, and the mitigation measures included in the site allocation policy to reduce landscape impacts. It also considers the wider policy provision. Long-term **minor negative effects** are also considered likely under the land, soil and water resources SEA topic. This is due to loss of greenfield land, and the potential loss of productive (i.e. BMV) agricultural land. **Minor negative effects to potentially neutral**

**effects** are concluded in relation to the historic environment, as whilst there are few assets that constrain the site, large-scale development would need to be sensitively designed to minimise impacts on historic character.

7.51 No further recommendations are made at this stage, noting that previous SEA recommendations have been incorporated in the finalised version of the GNP.

## 8. Next steps

- 8.1 The Glemsford Neighbourhood Plan and this Environmental Report will be submitted to Babergh District Council for subsequent Independent Examination.
- 8.2 At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the existing Local Plan.
- 8.3 If the Independent Examination is favourable, the Neighbourhood Plan will be subject to a referendum, organised by Babergh District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made' (i.e. brought into force). Once made, the Neighbourhood Plan will become part of the Development Plan for Glemsford Parish.

## Monitoring

- 8.4 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.
- 8.5 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by Babergh 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 Glemsford NP that would warrant more stringent monitoring over and above that already undertaken by the Council.
- 8.6 Though significant positive effects are predicted in relation to Community Wellbeing, it is considered that the existing monitoring framework within the Babergh District Council AMR includes sufficient indicators to monitor these effects.

# Appendix A Regulatory requirements

As discussed in **Chapter 1**, 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** links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table AA.2** explains this interpretation. Finally, **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**

Environmental Report question	In line with the SEA Regulations, the report must include... <sup>7</sup>
What's the scope of the SEA?	What is the plan seeking to achieve? <ul style="list-style-type: none"> <li>An outline of the contents and main objectives of the plan.</li> </ul>
	What is the sustainability 'context'? <ul style="list-style-type: none"> <li>Relationship with other relevant plans and programmes.</li> <li>The relevant environmental protection objectives established at international or national level.</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.</li> </ul>
	What is the sustainability 'baseline'? <ul style="list-style-type: none"> <li>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.</li> <li>The environmental characteristics of areas likely to be significantly affected.</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.</li> </ul>
	What are the key issues and objectives? <ul style="list-style-type: none"> <li>Key problems/issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment.</li> </ul>
What has plan-making / SEA involved up to this point?	<ul style="list-style-type: none"> <li>Outline reasons for selecting the alternatives dealt with.</li> <li>The likely significant effects associated with alternatives.</li> <li>Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.</li> </ul>
What are the assessment findings at this stage?	<ul style="list-style-type: none"> <li>The likely significant effects associated with the Regulation 14 version of the plan.</li> <li>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the Regulation 14 version of the plan.</li> </ul>
What happens next?	<ul style="list-style-type: none"> <li>The next steps for the plan making / SEA process.</li> </ul>

<sup>7</sup> NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

**Table AA.2 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;	The relevant environmental protection objectives, established at international or national level	
(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 aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	
(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 environmental characteristics of areas likely to be significantly affected	
(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;	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 'baseline'?</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;	Key environmental problems / issues and objectives that should be a focus of appraisal	i.e. answer - <i>What are the key issues &amp; objectives?</i>
(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	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]
(i) a description of the measures envisaged concerning monitoring.	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.3 ‘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
<b>Schedule 2 of the regulations lists the information to be provided within the SA Report</b>	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 (‘Local planning policy context’) 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 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 considered during its preparation;	The SEA framework is presented within Appendix B which also presents key messages from the context review. With regards to explaining “how...considerations have been taken into account”, Chapter 6 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 5 presents alternatives appraisal findings (in relation to housing growth, which is a ‘stand-out’ plan policy area). Chapters 7 presents an appraisal of the plan. With regards to assessment methodology, Chapter 7 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 highlights certain tensions between competing objectives, which might potentially be actioned by the Examiner, when finalising the plan. Also, specific recommendations have been incorporated in the final version of the plan.
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;	Chapter 4 deals 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 6 explains the Parish Council’s ‘reasons for selecting the preferred option’ (in-light of alternatives assessment).

9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 8 presents measures envisaged concerning monitoring.
10. A non-technical summary of the information provided under the above headings	The NTS is provided at the beginning of this Environmental Report.

**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 Glemsford Neighbourhood Plan, with a view to informing Regulation 16 consultation.
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**The SA must be considered, 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 considered 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

The following key issues have been identified through the SEA Scoping process, which considers the policy context of the neighbourhood area, baseline and future baseline conditions of the SEA topics, before identifying particular problems or opportunities that should be focused upon.

### Air quality

- While air quality is not a significant constraint in the neighbourhood area, increased vehicles within the neighbourhood area as a result of new development has the potential to negatively affect the health of residents.
- Development in the neighbourhood area also has the potential to impact the strategic transport network and sustainable transport network. This also includes opportunities to enhance accessibility and support more local and sustainable journeys / connections around the neighbourhood area.
- **Note this SEA theme has been scoped out of the SEA Framework.**

### Biodiversity

- New development through the GNP may impact the integrity of the neighbourhood area's SSSIs if brought forward within their proximity; and
- Ecological networks, including BAP Priority Habitats, may be impacted by new development which comes forward within the neighbourhood area, which may result in the fragmentation of important natural corridors.

### Climate change (including flood risk)

- Suffolk County Council and Babergh Council both declared a climate emergency in 2019 and aspires to become carbon neutral by 2030.
- The Glemsford neighbourhood area is partially affected by areas at high risk of fluvial flooding (Flood Zone 3) and surface water flooding. These areas are broadly found along the Glemsford's borders, although there are pockets of high surface water flood risk found throughout the neighbourhood area (including Glemsford village). Development should ensure appropriate flood risk mitigation (e.g., SuDS) and seek opportunities to improve drainage and reduce flood risk where they exist.
- The transport sector continues to be a key challenge in terms of reducing emissions. The GNP provides opportunities to guide development towards the most accessible available locations in the neighbourhood area and require local infrastructure (including walking and cycling) improvements where appropriate.
- The GNP should seek to maximise opportunities for local renewable energy and electric vehicle infrastructure development, as well as new green infrastructure and improved ecological links, to support climate resilience; and
- Opportunities to enhance the resilience of the neighbourhood area and its residents to the effects of climate change should be sought out in the GNP.

This can include adaptation strategies, green infrastructure enhancement, flood betterment measures, infrastructure development, and increased renewable energy sources.

## Community wellbeing

- The GNP provides the opportunity for enhanced policy provisions which seek to deliver the right mix of housing types, tenures and sizes according to local needs, in suitably connected places; and reduce deprivation in this respect.
- Glemsford neighbourhood area is well served by local services, facilities, and amenities; including green infrastructure; which work to support community vitality and improve quality of life for residents. The retention and enhancement of these assets should be sought whenever possible; and
- While not deprived overall, the neighbourhood area (2019) is shown to be deprived in the Education, Skills and Training domain, and Income Deprivation Affecting Children Index domain; with LSOA Babergh 002B falling within the 30% most deprived LSOAs nationally. The GNP should seek to support access to education and employment where possible.

## Historic environment

- The neighbourhood area includes numerous heritage assets, all of which present a constraint to future development due to the need to avoid impacts to the heritage assets and their setting. The GNP can help overcome this by ensuring any development that comes forward during the plan period is sensitive to the historic setting of the neighbourhood area in terms of design and layout.
- With a variety of designated assets, including non-designated and buried assets, opportunities to preserve this heritage through the GNP should be taken where appropriate. This will allow for the historic environment to continue to contribute to Glemsford's unique character.
- Planning for future growth through the GNP will support the delivery of development that is appropriate to its surroundings; recognising the need to maintain the linear form of development seen. This is likely to be underpin by detailed design and masterplanning in accordance with local and national policy (including the National Design Guide). Planned growth further provides an opportunity for public realm improvements, and accessibility improvements which can indirectly benefit access to and enjoyment of the historic environment.

## Landscape

- The neighbourhood area overlaps with South Suffolk and North Essex Clayland NCA, and Rolling Valley Farmlands SCA and Undulating Ancient Farmlands SCA. These designations have associated landscape features that contribute to the character and quality of the landscape, which should be protected and enhanced where possible.

- The neighbourhood area also includes part of the Stour Valley Project Area and SLA, which are identified for their picturesque landscape qualities, similar to that of Dedham Vale National Landscape. Any development within the neighbourhood area should be considerate to these sensitive areas and their settings.
- The central and western region of Glemsford is set in an area of rising topography. As such, views of and from important landscape areas discussed above, alongside locally significant features, could be adversely impacted by new development depending on its location, detailed design and layout. It is, however, recognised that the policy directions of the GNP (in addition to the higher level policy framework) will seek to ensure any adverse effects in this respect are avoided/ mitigated where possible.
- The growth strategy for the GNP should seek to minimise impacts on the wider landscape, including through avoidance / protection of key landscape features, such as valued trees and hedgerows, as well as local green spaces and the wider green infrastructure network; and
- The interplay between the existing built environment and open countryside is an important consideration for plan making within Glemsford.

## Land, soil and water resources

- The neighbourhood area is largely underlain by Grade 2 agricultural land, with a small area of Grade 3 quality agricultural land. The GNP provides opportunities to minimise the loss of higher-grade agricultural land, although due to the prevalence of BMV land, new development outside of Glemsford settlement could lead to the permanent loss of this resource.
- The majority of neighbourhood area falls within a Minerals Consultation Area, and as such development proposals may be required to consult with Suffolk County Council in this respect.
- It will be important for future development to ensure that it avoids any detrimental impacts on water quality both on and off-site. Furthermore, the GNP should seek to capitalise on any potential opportunities to improve water quality, particularly chemical quality; and
- The GNP could also seek to support extended measures to improve the resilience of water supplies, including through local water recycling schemes and opportunities to increase efficiency in water use, given the population of the local area and the demand for water is expected to rise.

## Transportation

- There are no train stations within Glemsford – the nearest station is located approximately 6 km to the south-east of the neighbourhood area. There are four buses that pass through the Parish, that vary their levels of service, but mostly serve schools in the surrounding area. As such, there is a high reliance on the private vehicle for residents.
- There are issues of localised congestion in the neighbourhood area, particularly in relation to on-street parking.

- The parish includes extensive active travel networks, connecting the settlement with the surrounding countryside. The GNP should seek to extend this network where possible, supporting connectivity within the neighbourhood area.
- An increase in working from home, and subsequent reduced commuting, will support improvements in the transport network; and should be facilitated through supporting infrastructure for example in new homes.

## SEA Framework

The identified key issues have informed the development of the SEA framework, which is essentially a table of the themes and objectives that provide a methodological framework for the subsequent assessment. The agreed SEA framework is presented below.

SEA Theme	SEA Objective	Supporting Questions (Will the Option/ Proposal Help to...)
Biodiversity	Maintain and enhance the extent and quality of biodiversity habitats and networks within and surrounding the neighbourhood area.	<ul style="list-style-type: none"> <li>• Protect and enhance nationally, and locally designated sites, including supporting habitats and mobile species that are important to the integrity of these sites?</li> <li>• Protect and enhance priority habitats and the links between them?</li> <li>• Achieve a net gain in biodiversity over and above national BNG standards?</li> <li>• Support habitat restoration or new habitat creation within the identified Network Enhancement or Expansion Zones?</li> <li>• Support enhancements to multifunctional green infrastructure networks and the network of open spaces?</li> </ul>
Climate Change (including Flood Risk)	Reduce the contribution to climate change made by activities in the neighbourhood area.	<ul style="list-style-type: none"> <li>• Reduce the number of journeys made by polluting vehicles?</li> <li>• Promote the use of sustainable modes of transport, including walking, cycling and public transport?</li> <li>• Improve or extend local footpaths, cycle paths or strategic green infrastructure routes?</li> <li>• Increase the number of new development meeting or exceeding sustainable design criteria?</li> <li>• Generate energy from low or zero carbon sources?</li> <li>• Reduce energy consumption from non-renewable resources?</li> <li>• Support the transition to electric vehicles?</li> </ul>
	Support the resilience of the neighbourhood area to the potential effects of climate change, including flood risk.	<ul style="list-style-type: none"> <li>• Avoid inappropriate development in areas at risk of flooding, considering the likely future effects of climate change?</li> <li>• Improve and extend green infrastructure networks in the neighbourhood area?</li> <li>• Sustainably manage water runoff?</li> <li>• Increase the resilience of the local built and natural environment?</li> <li>• Ensure the potential risks associated with climate change are duly considered in the design of new development in the neighbourhood area?</li> </ul>

SEA Theme	SEA Objective	Supporting Questions (Will the Option/ Proposal Help to...)
Community Wellbeing	Ensure growth in the neighbourhood area is aligned with the needs of all residents and in suitably connected places, supported by the appropriate and timely provision of infrastructure to enable cohesive and inclusive communities.	<ul style="list-style-type: none"> <li>• Provide everyone with the opportunity to live in good quality and affordable housing?</li> <li>• Support the provision of a range of house types and sizes targeted at aligning the housing stock with local needs?</li> <li>• Provide flexible and adaptable homes that meet people's changing needs?</li> <li>• Improve the availability and/ or accessibility of local services and facilities?</li> <li>• Encourage and promote social cohesion and active involvement of local people in community activities?</li> <li>• Contribute to improving aspects of deprivation in the neighbourhood area?</li> <li>• Maintain or enhance the quality of life of existing and future residents?</li> </ul>
Historic Environment	Protect, conserve and enhance the historic environment within and surrounding the neighbourhood area.	<ul style="list-style-type: none"> <li>• Conserve and enhance buildings and structures of architectural or historic interest, both designated and non-designated, and their settings?</li> <li>• Protect the integrity of the Conservation Area and its setting?</li> <li>• Conserve and enhance the special interest, character and appearance of locally important features and their settings?</li> <li>• Protect the integrity of the historic setting of key monuments of cultural heritage interest as listed in the Suffolk HER?</li> <li>• Support the undertaking of early archaeological investigations and, where appropriate, recommend mitigation strategies?</li> <li>• Support access to, interpretation and understanding of the historic evolution and character of the neighbourhood area?</li> </ul>
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape, including green infrastructure corridors.	<ul style="list-style-type: none"> <li>• Protect and/ or enhance the integrity and setting of the SLA and the Stour Valley Project Area?</li> <li>• Protect and/or enhance the integrity of the South Suffolk and North Essex Claydon NCA, and Rolling Valley Farmlands SCA and Undulating Ancient Farmlands SCA?</li> <li>• Protect and/ or enhance local landscape character and quality of place?</li> <li>• Conserve and enhance local identity, diversity, and settlement character?</li> <li>• Identify and protect locally important viewpoints which contribute to character and sense of place?</li> <li>• Protect and extend/ enhance green infrastructure corridors?</li> <li>• Protect visual amenity?</li> <li>• Retain and enhance landscape features that contribute to the rural setting, including trees and hedgerows?</li> </ul>
Land, Soil, and Water Resources	Ensure the efficient and effective use of land, and protect and enhance water	<ul style="list-style-type: none"> <li>• Avoid the loss of high-quality agricultural land resources?</li> <li>• Promote any opportunities for the use of previously developed land, or vacant / underutilised land?</li> </ul>

SEA Theme	SEA Objective	Supporting Questions (Will the Option/ Proposal Help to...)
	quality, using water resources in a sustainable manner.	<ul style="list-style-type: none"> <li>• Avoid impacts on water quality?</li> <li>• Support improvements to water quality?</li> <li>• Ensure appropriate drainage and mitigation is delivered alongside development?</li> <li>• Protect the neighbourhood area's waterbodies?</li> <li>• Maximise water efficiency and opportunities for water harvesting and/ or water recycling?</li> <li>• Protect the integrity of mineral resources?</li> </ul>
Transportation	Promote sustainable transport use and reduce the need to travel.	<ul style="list-style-type: none"> <li>• Support the objectives within the Suffolk Local Transport Plan to encourage the use of more sustainable transport modes?</li> <li>• Encourage the uptake of active travel opportunities?</li> <li>• Extend or improve active travel networks?</li> <li>• Facilitate working from home to reduce the use of private vehicles to access workplaces outside of the neighbourhood area?</li> <li>• Reduce the impact of the transport sector on climate change?</li> <li>• Improve road safety and reduce pollution from vehicles?</li> <li>• Reduce the impact on residents from the road network?</li> <li>• Improve parking facilities?</li> </ul>

