

SEA for the Long Melford Neighbourhood Plan

Environmental Report

April 2021

Quality information

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Non-Technical Summary

What is Strategic Environmental Assessment (SEA)?

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

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to 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 Long Melford Neighbourhood Plan?

The Long Melford Neighbourhood Plan 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 adopted Babergh Local Plan Core Strategy (2014) and the emerging Babergh and Mid Suffolk Joint Local Plan.

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 (June 2019), which includes information about the Neighbourhood Plan area's environment and community. The second document was an initial version of this Environmental Report prepared in March 2020 to provide commentary on the earlier version of the Neighbourhood Plan.

The purpose of this Environmental Report is to:

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

Assessment of reasonable alternatives for the Long Melford Neighbourhood Plan

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

Assessment of site options

As an initial phase of this part of the SEA process, eight site options were initially assessed against the SEA Framework of objectives and assessment questions developed during scoping. The sites considered were as follows:

Site reference	Site name	Area (ha)	Indicative housing capacity
Site A1	Cordell Road, adjacent to rear of Bull Hotel	0.1	3
Site C1 ¹	Site off Station Road, known as Skylark Fields	25.5 (<i>though developable area is assumed to be 8.23ha as per application DC/18/00606</i>)	150
Site D1	Land in Borley Road	0.7	10
Site F1	Land east of Rodbridge Hill and opposite Ropers Lane	1.1	30
Site G1	Spicers Lane	<0.1	1
Site H5	Land east of Harefield	22.4	150
Site K1	Land west of High Street	1.2	30
Site L1	Cordell Road	0.1	3

The findings of the appraisal of these site options are presented in section 4.28 of the main body of the Environmental Report.

Assessment of development strategy options

Informed by the assessment of the eight site options, four development strategy options, which comprised different combinations of the eight sites, were then appraised as reasonable alternatives through the SEA process.

These options were as follows:

- **Option 1:** Sites A1, G1 and L1 plus site D1. 17 dwellings. Low growth option.
- **Option 2:** Sites A1, G1 and L1 plus sites D1, F1 and K1. 77 dwellings. Preferred option.
- **Option 3:** Sites A1, G1 and L1 plus site C1. Around 157 dwellings. Higher growth option.
- **Option 4:** Sites A1, G1 and L1 plus site H5. Around 157 dwellings. Alternative higher growth option.

A description and explanation of these options, followed by assessment findings, are presented from section 4.31 in the main body of the Environmental Report.

¹ It is recognised that as of April 2020, outline planning consent has been granted at Site C1 for 150 dwellings. See paragraph 4.9 of this report for further details.

Assessment of the submission version of the Long Melford Neighbourhood Plan

The assessment of the latest version of the Neighbourhood Plan has concluded that the plan as a whole is likely to lead to significant positive effects in relation to the population and communities SEA theme, whilst minor positive effects are anticipated in relation to the biodiversity, climate change and historic environment themes. Neutral effects are anticipated in relation to the transport theme, whilst minor negative effects are anticipated in relation to the land, soil and water resources theme. Uncertain effects are anticipated in relation to the landscape themes.

Significant positive effects are predicted in relation to population and communities because the plan proposes to exceed minimum housing need, including the delivery of a significant quantum of affordable housing. Housing growth will be well dispersed throughout the village, whilst new community infrastructure will be delivered also, enhancing the social and economic vitality of the plan area.

Minor positive effects are predicted in relation to biodiversity given the potential for habitat enhancement at all proposed site allocations, as well as the avoidance of harm to designated sites. Similarly, minor positive effects are predicted in relation to the historic environment on the basis that the plan's policies are considered to adequately mitigate potential risks to the historic environment at sensitive site allocations, whilst also offering potential to enhance a number of sites within their historic context. Minor positive effects in relation to climate change are predicted on the basis that the plan's distribution of growth avoids areas of significant flood risk and its detailed policies include further flood risk mitigation, as well as providing for adaptation to, and mitigation of, other effects of climate change through proposed green infrastructure protection and enhancement. Finally, minor positive effects are anticipated under health and wellbeing, on the basis that the plan brings forward development which supports walking and cycling access to a range of local services, whilst also protecting and enhancing recreational opportunities in the village.

Neutral effects are predicted in relation to transport on the basis that, on balance, the plan's policies and allocations are unlikely to support behaviour change which notably either positively or negatively changes the baseline position of the plan area in respect of either theme.

Negative effects are predicted in relation to land, soils and water resources on the basis that the plan proposes development which will necessitate the avoidable loss of productive agricultural land at Site F1 without mitigation. The site has potential to be underlain by 'best and most versatile' agricultural land, though a detailed survey would be required to establish its precise grade.

When read as a whole, the Neighbourhood Plan is anticipated to result in **broadly positive effects in relation to the SEA framework.**

Next steps

The Long Melford 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 the existing 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 Long Melford Parish.

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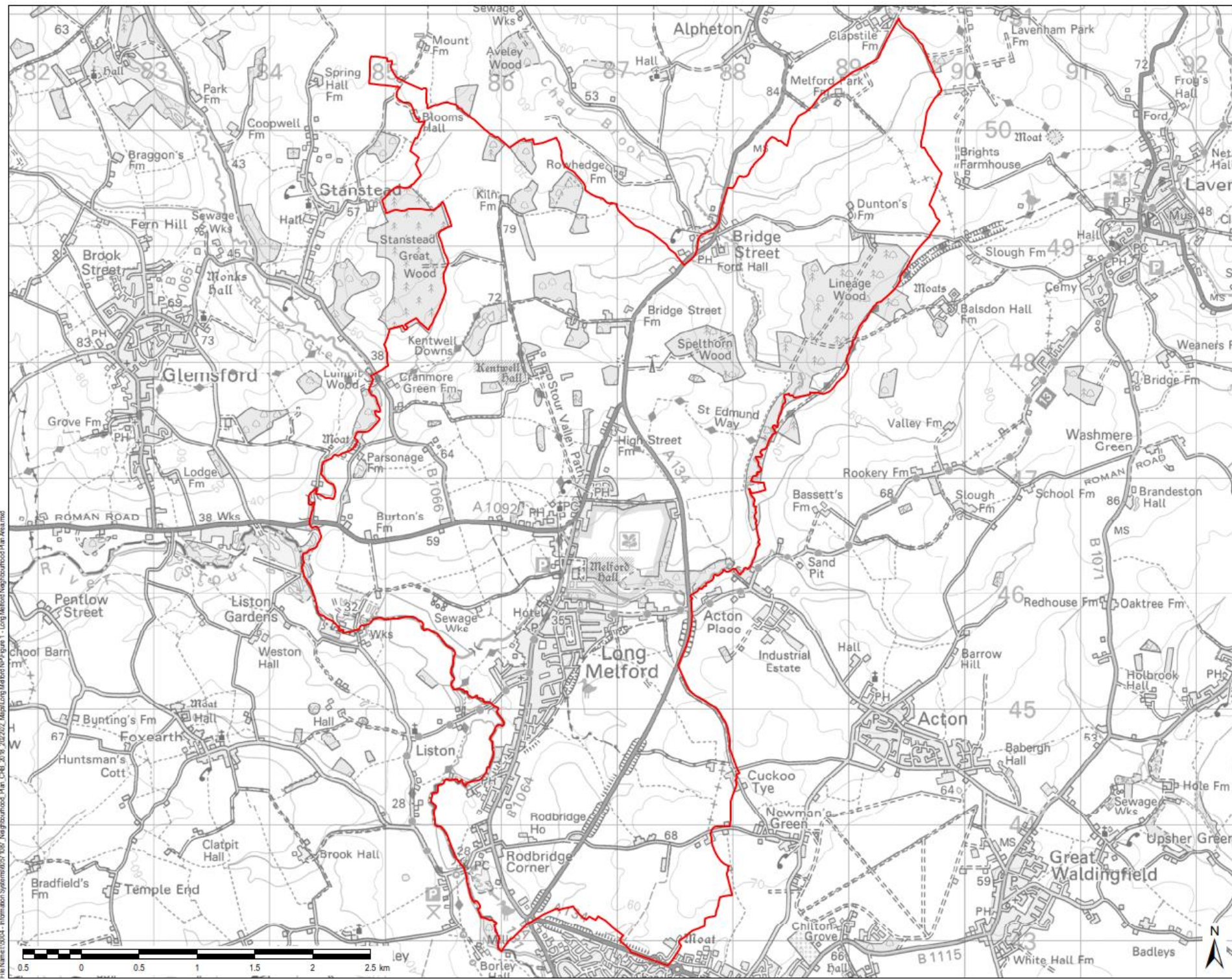
1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in relation to the Long Melford Neighbourhood Plan.
- 1.2 The Long Melford Neighbourhood Plan has been prepared as a Neighbourhood Development Plan under the Localism Act 2011. The Neighbourhood Plan is being prepared in the context of the adopted Babergh Local Plan Core Strategy (2014) and the emerging Babergh and Mid Suffolk Joint Local Plan, submitted to the Secretary of State in March 2021.
- 1.3 The Neighbourhood Plan will be submitted to Babergh District Council in Spring 2021.
- 1.4 Key information relating to the Long Melford Neighbourhood Plan is presented in Table 1.1 below:

Table 1.1 Long Melford Neighbourhood Plan Key Facts

Name of Responsible Authority	Long Melford Parish Council
Title of Plan	Long Melford Neighbourhood Plan
Subject	Neighbourhood planning
Purpose	<p>The Long Melford Neighbourhood Plan has been prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan must be in general conformity with Babergh District Council's adopted Core Strategy and have regard for the policies of the submission version of the Babergh and Mid Suffolk Joint Local Plan.</p> <p>The Long Melford Neighbourhood Plan will be used to guide and shape development within the Long Melford Neighbourhood Plan area.</p>
Timescale	2018 - 2037
Area covered by the plan	The Neighbourhood Plan area covers the parish of Long Melford in Babergh District, Suffolk (see Figure 1.1).
Summary of content	The Long Melford Neighbourhood Plan sets out a vision, strategy and range of policies for the Neighbourhood Plan area.
Plan contact point	<p>Don Lovelock, Clerk to Long Melford Parish Council</p> <p>Email address: clerk@longmelford-pc.gov.uk</p>



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LEGEND
 Long Melford Neighbourhood Plan Area

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Drawing Title
LONG MELFORD PARISH NEIGHBOURHOOD PLAN AREA

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File Name: \\004 - Information Systems\60571087_Neighbourhood_Plan_C88_2619_202202_Maps\Long Melford\02\Figure 1 - Long Melford Neighbourhood Plan Area.mxd

SEA explained

- 1.1 The Long Melford Neighbourhood Plan has been screened in by Babergh District Council (BDC) as requiring SEA due to the potential for significant environmental effects from site allocations within the Neighbourhood Plan area.
- 1.2 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 Long Melford Neighbourhood Plan seeks to maximise the emerging Neighbourhood Plan's contribution to sustainable development.
- 1.3 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

- 1.4 The SEA Regulations require that a report (known as the Environmental Report) must be published for consultation alongside the submission plan which 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.5 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?
- 1.6 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 Long Melford Neighbourhood Plan seeking to achieve; and what is the scope of the SEA?

2. Local planning policy context

Relationship with Babergh planning policy

- 2.1 The Long Melford Neighbourhood Plan is being prepared in the context of the adopted Babergh Development Plan and the emerging Babergh and Mid Suffolk Joint Local Plan, submitted to the Secretary of State in March 2021.
- 2.2 The adopted Development Plan comprises the following documents:
 - Saved policies from the Babergh Local Plan Alteration No.2 (2006)
 - Babergh Core Strategy (2014)
 - Suffolk Minerals Core Strategy (2008)
 - Suffolk Waste Core Strategy (2011)
- 2.3 The submission Babergh and Mid Suffolk Joint Local Plan will provide a framework for development to 2037 and will replace the saved policies of the adopted 2006 Local Plan and the entire adopted Core Strategy. Minerals and waste planning will continue to be the responsibility of Suffolk County Council. The submission version of the Joint Local Plan was submitted to the Secretary of State in March 2021.
- 2.4 The Long Melford Neighbourhood Plan must be in general conformity with the strategic policies of the Development Plan, as per footnote 16 of the National Planning Policy Framework (NPPF) (2019)². Additionally, the NPPF states that “*local planning authorities may give weight to relevant policies in emerging plans*” according to criteria including the stage of preparation which the emerging plan has reached. Whilst the emerging Joint Local Plan is not yet adopted, it underwent Regulation 18 consultation between July 22nd and September 30th 2019 and Regulation 19 consultation in November 2020 and submission in March 2021 and therefore contributed significantly to the strategic context of the Long Melford Neighbourhood Plan as it emerged.
- 2.5 The settlement hierarchy set out in both the adopted Core Strategy and the submission Joint Local Plan identifies that Long Melford is a ‘Core Village’ which will “*act as a focus for development*”. The emerging Joint Local Plan states that this development “*will be delivered through site allocations in the Joint Local Plan and/or in Neighbourhood Plans*”.

Housing numbers to be delivered through the Neighbourhood Plan

- 2.6 Policy SP04 (Housing Spatial Distribution) of the submission Joint Local Plan (JLP) states that Babergh’s Core Villages will deliver around 2,699 dwellings over the plan period to 2037. The supporting text of Policy SP04 includes a table which proposes a distribution of housing growth between all Neighbourhood Plan areas in Babergh. Long Melford is allocated **a minimum housing requirement of 367 new dwellings** over the plan period to 2037, though this figure “*includes outstanding planning permissions granted as at 1st April 2018*” meaning the residual need will be lower once completions and commitments are factored in (completions before 01/04/2018 do not contribute to meeting the housing target).
- 2.7 Policy SP04 is clear that as of 1st April 2018 there were 217 “outstanding planning permissions” (i.e. 217 commitments or completions) in Long Melford, leaving a residual target of 150 homes. However, this residual target will be met in full via submission Joint Local Plan Policy LA113 (Allocation: Land east of the B1064, Long Melford), which allocates 150 dwellings plus associated infrastructure at Station Road at the south of the village.
- 2.8 The Neighbourhood Plan therefore has **no residual housing target to deliver**. Nevertheless, it is important to note that the 367-dwelling target in the JLP is a minimum, not a ceiling. Policy SP04 is clear that “*Neighbourhood Plan documents can seek to exceed these requirements, should the unique characteristics and planning context of the designated area enable so*”.

² MHCLG (2019), National Planning Policy Framework [online], available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf#page=12

- 2.9 In this context, the Neighbourhood Plan proposes to allocate around 77 new dwellings across six sites. These allocations are proposed to take advantage of an affordable housing opportunity site to meet identified local needs, ensure best use of available land and to deliver new local facilities (particularly new allotments). Allocating above the minimum JLP housing figure is also considered pragmatic in order to future-proof the Neighbourhood Plan area should Babergh's housing delivery test measurement fall below 100% again in future, whilst also demonstrating that the Neighbourhood Plan is being positively prepared.

Vision and objectives of the Long Melford Neighbourhood Plan

Vision

- 2.10 The Neighbourhood Plan sets out a detailed vision of Long Melford in 2037 at the end of the plan period. The key messages from this vision are summarised below:
- Additional housing will have been provided in a sustainable fashion to enable all in the parish to access satisfactory housing.
 - The village's heritage assets will have been maintained and enhanced to make an even greater contribution to the village's visitor offer.
 - The natural features that surround the village will be preserved and enhanced.
 - In an ideal world, through traffic on Hall Street at the village centre will have been largely eliminated, potentially enabled by provision of shared space.
 - Shops, the primary school, the GP surgery and other services will be flourishing and will continue to provide key local services to residents of the village and surrounding hinterland areas.
 - Long Melford will continue to be an attractive place to live and work for all groups within the community.

Objectives

- 2.11 To deliver this vision, the Neighbourhood Plan sets out the following objectives:
- a) To protect and enhance the heritage assets of the parish and to promote access to those which are open to the public.
 - b) To protect and enhance the open spaces, the landscapes, and the Public Rights of Way within the parish and to facilitate more people having the opportunity to enjoy the countryside.
 - c) To protect and enhance our valuable natural environment.
 - d) To promote sustainable modes of travel, especially walking, cycling, electric cars and public transport.
 - e) To improve amenities and the character and atmosphere of the village centre for residents, visitors and local businesses.
 - f) To support and enhance viable businesses within the village and to provide the right conditions for the encouragement of employment.
 - g) To encourage tourism and to provide the right environment for a wide range of events to take place in the village.
 - h) To allocate land for housing development in sustainable locations to meet the demonstrated need for additional housing.
 - i) To ensure that additional developments include sufficient affordable housing, housing for local people and housing of different types.
 - j) To ensure that that the village services and facilities reflect the present needs of the population, with sufficient capacity to also meet future needs. This applies to services such as the GP surgery and primary school but also to the facilities for recreation in the village.

3. Scope of the SEA

SEA scope

- 3.1 The SEA Regulations require that ‘when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies’. In England, the consultation bodies are Natural England, the Environment Agency and Historic England.³
- 3.2 The SEA Scoping Report underwent consultation with the statutory consultees between June 17th 2019 and July 22nd 2019. A summary of representations to the Scoping Report consultation, along with how they have been considered, is presented in **Appendix A**.
- 3.3 The key issues for the SEA, as identified by the SEA Scoping Report, are presented in **Appendix B**.

SEA framework

- 3.4 The key issues identified through the Scoping Report have been translated into a framework of SEA themes and objectives. This is a methodological framework for the appraisal of likely significant effects on the baseline. This framework is presented below:

Table 3.1 The SEA framework

SEA theme	SEA objective
Biodiversity	<ul style="list-style-type: none"> Protect and enhance all biodiversity and geological features, including seeking a net gain where possible.
Climate change	<ul style="list-style-type: none"> Reduce the level of contribution to climate change made by activities within the Neighbourhood Plan Area Support the resilience of the Neighbourhood Plan Area to the potential effects of climate change, including flooding
Historic environment	<ul style="list-style-type: none"> Protect, maintain and enhance the rich variety of cultural and built heritage within the Neighbourhood Plan area
Landscape	<ul style="list-style-type: none"> Protect and enhance the character and quality of landscapes and townscapes within and surrounding the Neighbourhood Plan area
Land, soil and water resources	<ul style="list-style-type: none"> Ensure the efficient and effective use of land Use and manage water resources in a sustainable manner
Population and communities	<ul style="list-style-type: none"> Cater for existing and future residents’ needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities. Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.
Health and wellbeing	<ul style="list-style-type: none"> Improve the health and wellbeing of residents within the Neighbourhood Plan area.
Transport	<ul style="list-style-type: none"> Promote sustainable transport use and reduce the need to travel

³ In line with Article 6(3) of the SEA Directive, these consultation bodies were selected ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes’.

4. Plan-making and SEA so far

Introduction

- 4.1 The 'narrative' of plan-making and SEA for the Long Melford 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 Regulations⁴ 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.

Plan making and SEA so far

- 4.4 Plan making has been underway in Long Melford since 2017 following the approval of Long Melford's Neighbourhood Area application by Babergh District Council. The scope, objectives and policies of the plan have evolved in response to extensive engagement with the local community by the Parish Council.
- 4.5 The Parish Council undertook statutory pre-submission Regulation 14 consultation on the draft Neighbourhood Plan between 17th January and 28th February 2019.
- 4.6 Subsequent to this, the draft Neighbourhood Plan was screened in by Babergh District Council as requiring SEA in April 2019⁵. SEA scoping was undertaken in June 2019 and statutory consultees (Natural England, Historic England and the Environment Agency) consulted on the scoping report between June 17th and July 22nd 2019 (as outlined in Chapter 3, above).
- 4.7 A full SEA Environmental Report (ER) was completed in March 2020 to reflect the draft Neighbourhood Plan and emerging Joint Local Plan (JLP) as they stood at the time. However, a decision was taken not to submit the March 2020 version of the Neighbourhood Plan and accompanying SEA ER whilst awaiting the outcome of a recovered appeal in relation to an application for 150 dwellings at Station Road (application number DC/18/00606).
- 4.8 In April 2020 the Secretary of State upheld an inspector's decision to allow the appeal and thereby grant permission for the scheme, altering the planning context in which the Neighbourhood Plan was being prepared and necessitating focussed updates to both Neighbourhood Plan and the SEA.⁶ This included a revision to the housing target for Long Melford which saw the JLP increase the target from 217 dwellings to 367. This April 2021 version of the SEA ER reflects the updated Neighbourhood Plan.
- 4.9 Although the appeal decision required points of detail in the Neighbourhood Plan to be amended, the Parish Council has determined that their preferred strategy remains unchanged, namely the allocation of around 77 new dwellings across six sites. Therefore, this SEA ER presents an appraisal of the reasonable alternatives which informed the selection of this preferred strategy. This means that the appraisal of reasonable alternatives reflects the site options in play *before* the determination of DC/18/00606.
- 4.10 However, in light of the changed context of the Neighbourhood Plan and changes to a number of its policy proposals, it is appropriate that the assessment findings of the March 2020 version of the Neighbourhood Plan are reviewed in detail in this updated SEA ER. The revised appraisal can be found in Chapter 5 of this report.

⁴ Environmental Assessment of Plans and Programmes Regulations 2004

⁵ <https://www.babergh.gov.uk/assets/Neighbourhood-Planning/Long-Melford-NP-SEA-Determination-Apr2019.pdf>

⁶ <https://acp.planninginspectorate.gov.uk/ViewDocument.aspx?fileid=37013451>

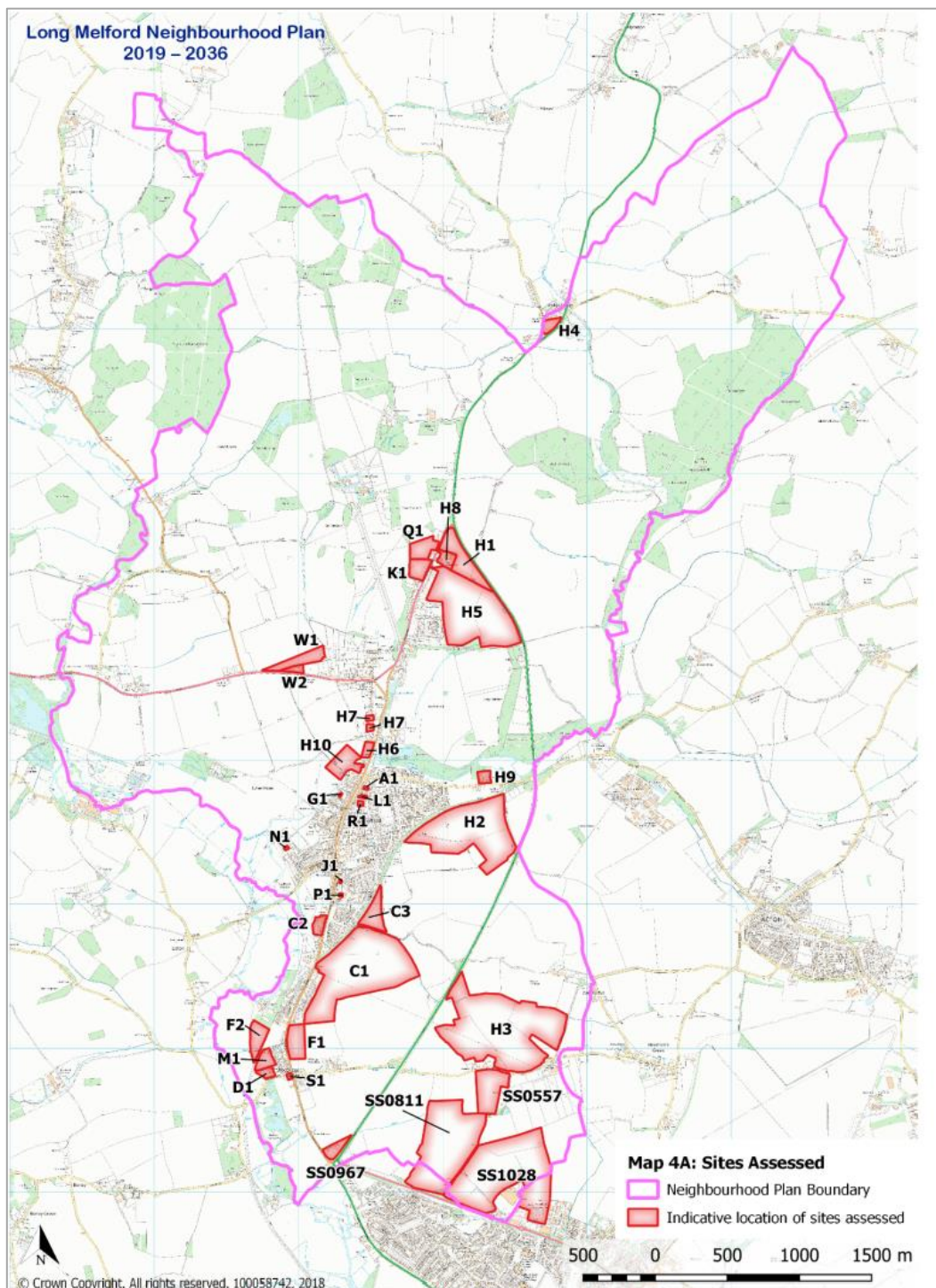
4.11 As discussed in Chapter 2 above the Neighbourhood Plan seeks to deliver 77 new dwellings in Long Melford. In order to explore potential site options for delivering this growth, the Parish Council has tested a total of **33 site options** around Long Melford.

4.12 Site options were identified from the following sources:

- Babergh District Council's SHELAA (2017).
- Public call for sites exercise (2018).
- Direct approach to known third party landowners.
- Sites identified by the Long Melford NPSG.

4.13 These site options all underwent site assessment by the Parish Council.

Figure 4.1 Potential Long Melford site options



Summary of the Parish Council's site assessment

- 4.14 The Parish Council undertook a two-part site assessment exercise to test the site options against a range of criteria to identify which sites may be suitable and achievable in principle for allocation to help meet Long Melford's housing need. The first part comprised a strategic assessment and the second part a detailed assessment.
- 4.15 For completeness, all 33 identified site options were tested. However, a total of **13 of these sites were found to be unavailable** due to the lack of landowner support for allocation. Therefore, the pool from which to identify suitable, achievable and available sites effectively comprised 20 sites in total.
- 4.16 Full details of the Parish Council's site assessment can be found in Appendix 3 of the submission Neighbourhood Plan. A summary is provided below.

Methodology

- 4.17 Sites were assigned a score between 1 and 3 in relation to each assessment criterion. A score of 1 indicated a weak performance, a score of 2 a medium performance and a score of 3 a strong performance.
- 4.18 **Part 1** of the assessment tested sites against three high-level criteria: current land use (i.e. brownfield or greenfield); distance from key village centre services, and; potential heritage sensitivity.
- 4.19 A maximum score of 9 was therefore possible for each site in part 1. Sites which achieved a total part 1 score of 7 out of 9 or above were considered to perform strongly. Sites which achieved a score of 6 out of 9 were considered to perform moderately and sites which achieved a score below 6 out of 9 were considered to perform weakly.
- 4.20 **Part 2** of the assessment then tested sites against 23 detailed criteria, such as distance from designated biodiversity sites, access to public transport and agricultural land quality.
- 4.21 However, it is important to note that the assessment exercise was not simply a quantitative one. The assessment text explains:

"Scores were given to sites in the first and second rounds of evaluation, but they were not the only factors influencing whether a site was taken forward. Other issues included the balance of sites between different parts of the parish, the size of sites (given the NPPF policy to provide small sites for smaller developers and the strong preference in the Residents Survey for small sites), the opportunity for affordable housing, the desirability of maintaining a Rural Gap between Sudbury and Long Melford and the potential for public benefits related to a site."

Results

- 4.22 **Part 1** found that a total of four sites performed strongly and two sites performed moderately: Site A1, Site G1 and Site L1 achieved a maximum score of 9, Site D1 achieved a score of 7 whilst C1 and H5 achieved scores of 6 each. All other sites performed weakly in the strategic assessment.
- 4.23 **Part 2** ranked the sites on the basis of their detailed assessment scores to inform the decision on which sites to take forward. On the understanding that the assessment scores were *"not the only factors influencing whether a site was taken forward"* there was an opportunity to feed in sites which offer significant potential to contribute to the plan vision and objectives despite scoring less strongly in the technical assessment. In this context Site F1 and Site K1 were fed back into consideration on the basis that they offer unique opportunities to deliver specific community infrastructure which may not otherwise be deliverable.
- 4.24 Therefore, the Parish Council's site assessment found that a total of four sites (A1, D1, G1, and L1) warrant further testing through the SEA on the basis of their strong site assessment performance, whilst a total of two sites (F1 and K1) warrant further testing through the SEA on the basis of their potential to significantly contribute to the objectives of the Neighbourhood Plan despite their weaker site assessment performance.

Testing sites against the SEA framework

- 4.25 In addition to the four sites identified through the site assessment as performing strongly and the two sites identified as having potential to significantly contribute to the plan objectives the SEA must consider key omission sites to inform the reasonable alternatives. Therefore, it is considered prudent to also test the two sites which performed moderately in the site assessment exercise and which have attracted recent developer interest. These are Site C1 and site H5.
- 4.26 In light of the above, a pool of **eight potential site options** are identified for testing against the SEA framework and to develop reasonable alternative spatial strategies for delivering housing growth through the Neighbourhood Plan.
- 4.27 These sites are summarised in Table 4.1 below:

Table 4.1 Potential site options at Long Melford subject to mitigation of constraints⁷

Site reference	Site name	Area (ha)	Indicative housing capacity
Site A1	Cordell Road, adjacent to rear of Bull Hotel	0.1	3
Site C1 ⁸	Site off Station Road, known as Skylark Fields	25.5 (though developable area is assumed to be 8.23ha as per application DC/18/00606)	150
Site D1	Land in Borley Road	0.7	10
Site F1	Land east of Rodbridge Hill and opposite Ropers Lane	1.1	30
Site G1	Spicers Lane	<0.1	1
Site H5	Land east of Harefield	22.4	150
Site K1	Land west of High Street	1.2	30
Site L1	Cordell Road	0.1	3

SEA site assessment findings

- 4.28 To support the consideration of these sites for allocation in the Neighbourhood Plan, the SEA process includes an appraisal of the key environmental constraints and opportunities at each of the sites and potential effects that may arise as a result of development. The sites have been considered in relation to the SEA framework developed during SEA scoping (outlined in Table 3.1) and the baseline information.
- 4.29 The appraisals of the performance of each potential site option against the SEA framework are presented below:

Appraisal key

Likely adverse effect (without mitigation measures)		Likely positive effect	
Neutral/no effect		Uncertain effects	

⁷ Based on the LMPC site assessment findings, available at: <http://www.longmelfordnp.co.uk/wp-content/uploads/2019/01/Appendix-3-Call-for-Sites-GA3-RE-v1.pdf>

⁸ It is recognised that as of April 2020, outline planning consent has been granted at Site C1 for 150 dwellings. See paragraph 4.9 of this report for further details.

Site A1

Site size: 0.1 ha

Biodiversity	Site A1 is a brownfield site in the built area of the village comprised of an area of hardstanding and a garage or workshop-style structure of no notable biodiversity value. The site is not near to any designated biodiversity sites and does not support any planting or natural habitat. The site therefore has no notable biodiversity sensitivity.	
Climate change	The site performs well in relation to climate change mitigation as its central location within the village is considered likely to incentivise residents to walk to local services and facilities which are just metres away in many cases. It may be that in some instances walking could represent a more convenient option than any other mode. In terms of climate change adaptation the site is not directly affected by fluvial or surface water flood risk.	
Historic environment	By virtue of its location immediately east of the historic Hall Street at the centre of the village Site A1 has potential to be within the setting of up to four Grade II listed buildings which face onto Hall Street, particularly The Nookery and The Pharmacy. Additionally, the site is adjacent to the rear of the Grade II* listed Bull Hotel which also fronts onto Hall Street but wraps around in a horseshoe configuration to Cordell Road, and is within the Long Melford conservation area. However, despite this proximity the site faces away from the historic core and towards the mid-20 th century residential development to the east of Cordell Road. This gives the site transitional location within the Long Melford street scene at the point where the character of the historic core gives way to the more modern development which comprises much of the settlement's east. In this context it is considered that there is no single dominant character to Cordell Road and that the individual heritage assets of the Bull Hotel and, more distantly, along Hall Street, are tempered by the more immediate presence of dwellings of little heritage value. It is considered that the nature of effects from development at the site will depend largely on matters of design, layout and massing. Well designed development could have potential to complement the transitional character of the street scene by being both sympathetic to the adjacent heritage assets whilst also softening the transition to the modern residential character to the east. Conversely, design which jars with, obscures or dominates the Bull Inn and the nearby buildings on Hall Street to the rear would likely have a negative effect on the historic environment SEA theme. In this context it is considered that effects are uncertain at this stage.	
Landscape	The site has no landscape sensitivity due to its location at the centre of the village with no views in from or out to the rural landscape beyond. However, as noted above, the site's location at the fringe of the village's historic core gives it potential for townscape sensitivity. The site is currently of poor quality and contributes little to the street scene. This suggests strong potential for development to make a positive contribution to townscape through the revitalisation of a derelict site, though the potential heritage sensitivity of the location will likely mean that the eventual impact on townscape will be strongly influenced by design and layout of the scheme. Although there are multiple influences on the character of Cordell Road in terms of style, plot size, and era, it is again considered that the design and layout of development will determine whether the effect is positive or negative.	
Land, soil and water resources	Positive effects are anticipated in relation to the land, soil and water resources SEA theme on the basis that the site offers an excellent opportunity to deliver growth at a previously developed site within the built area, reducing the need for land take at greenfield sites at the edges of the settlement. It is considered that development at Site A1 is unlikely to have any notable effects on water resources and will have no effect on agricultural land.	
Population and community	The site's central location will help deliver new homes which are well placed to access the key services and facilities of the village, including shops, the surgery, pubs and bus stops. Residents will therefore be very well located to meet many of their day to day needs. Development at the site would not necessitate the replacement of any existing dwellings and would therefore deliver a positive net gain in housing for the village. The site is proposed for specialist elderly accommodation which will contribute to meeting a range of needs within the community.	
Health and wellbeing	Development at the site would be very well positioned to support access to the existing healthcare facilities at the Long Melford Practice doctors surgery which is a short distance further along Cordell Road. Additionally, the site's location would likely support healthy and active lifestyle choices by virtue of being close to key services.	
Transport	For the reasons outlined above, positive effects are anticipated in relation to the Transport SEA theme, namely that the site could support modal shift towards walking and cycling for meeting many local needs, including accessing supermarkets which can often both be traffic-generating services. Additionally, the site is well placed to access the frequent bus services between Sudbury and Bury St Edmunds which serve nearby Hall Street.	

Site C1

Site size: 27 ha (though developable area assumed to be 8.23ha as per application DC/18/00606)

Biodiversity	Site C1 is located immediately east of the Railway Walk Local Nature Reserve, which forms the site's north western boundary. There is currently limited connectivity between the site and the LNR though such connectivity would likely be introduced through the development process to facilitate pedestrian access to the village centre. This would likely lead to an increase in recreational pressure on the LNR, though there could be potential to provide alternative recreational space within a future development onsite. The site's existing agricultural use is considered unlikely to support notable biodiversity potential. Site C1 is considered likely to have an uncertain effect in relation to the biodiversity SEA theme as the nature of effects may be determined by the extent to which additional pressure on the LNR is managed or mitigated.
Climate change	The site offers potential to minimise unnecessary car journeys via pedestrian access to services at the village centre. The site is served by existing bus stops on the B1064 which offer potential to reach higher tier service centres via sustainable transport. However, it is recognised that the easy access to the road network would likely encourage a proportion of journeys to be made by car. In terms of climate change mitigation the site is not within an any of the Environment Agency's identified fluvial flood risk zones or identified areas of surface water flood risk. The currently open and undeveloped nature of the site would necessarily be altered through allocation and development would introduce areas of hardstanding which can contribute to a heating effect. However, this has potential to be mitigated through the incorporation of areas of planting and green infrastructure into the final scheme.
Historic environment	Site C1 is located well south of the village's historic core and away from the conservation area, and is also distant from any individual listed buildings or other designated heritage assets. Development at the site would therefore carry minimal risk of harm to specific heritage assets, though its size and prominent position in the landscape is considered to give it potential to affect a broader change in settlement character, which could lead to a limited degree of indirect erosion of the village's historic character.
Landscape	The site is open, prominent and highly visible in the landscape from the south of village and the southern approach to the village centre, where it rises to the east away from the B1064. This ensures the site makes an important contribution to the landscape character of the village, projecting openness and rurality towards the heart of the village whilst also limiting its outward sprawl. Development at Site C1 would therefore have potential to adversely affect both the character and the quality of Long Melford's landscape setting, whilst also substantially altering the existing form and pattern of the village, whose eastern boundary of the former railway line would be breached by development at the site. It is considered that Site C1 performs notably poorly in relation to the landscape SEA theme.
Land, soil and water resources	The site is large, undeveloped and in productive agricultural use in an area underlain by Grade 2 or Grade 3 agricultural land. This gives it potential to be high quality 'best and most versatile' land, the loss of which would be inevitable through development. In light of other suitable, available and achievable sites which avoid the loss of BMV land this would be inconsistent with the SEA objective to make most efficient use of available land. Consequently, the site performs poorly in relation to the land, soil and water resources SEA theme.
Population and community	The site would deliver new housing at a location which offers the opportunity to access local services and facilities, helping to cater for existing and future residents' needs. The site has an indicative capacity of around 150 dwellings which would be sufficient to trigger affordable housing provision onsite or a commuted payment towards offsite provision under policy SP02 (Affordable Housing) of the submission joint Local Plan. A scheme of this size could also offer potential opportunities to deliver a range of types and tenures of housing to help meet different needs within the community, such as specialist elderly accommodation.
Health and wellbeing	The site supports good access to the public right of way network around the village and much of the site is likely to be within reasonable walking and cycling distance of village services. This could help incentivise exercise for both recreation and to fulfil day-to-day needs locally, though the southern extent of the site is around 1.5 kilometres from the village centre which may be too far to walk for less able residents.

Transport

The site has potential to support sustainable transport choices by virtue of the potential to walk to village centre services and facilities and the relatively nearby bus stops offering regular services between Bury St Edmunds and Sudbury. This could help encourage journeys to the village centre to be made by walking or cycling. However, it is considered that although a range of local needs could potentially be met within the village it is likely that the private car will remain the choice of many residents, particularly as the site is well located to access the local and strategic road network.

Site D1

Site size: 0.7 ha

Biodiversity	An area of Deciduous Woodland BAP priority habitat is located to the south west of the site, though in practice it is considered that the site itself has relatively low biodiversity sensitivity. The site is largely comprised of an area of hardstanding on a former quarry or gravel extraction site, fringed by unprotected areas of planting. It is considered there is little potential for supporting notable biodiversity. Development on site is considered unlikely to notably affect the nearby BAP priority habitat. Additionally there could be opportunities to enhance habitats through the development process to create stronger habitat linkages with the Melford Country Park Nature Reserve to the south.
Climate change	The site could have some potential to reduce car use as it connects with the pedestrian-friendly access to the village centre via Ropers Lane which can be accessed at the north east of the site. The principle of such access is positive, though the site is around 1.5km from the village centre which may be sufficiently far to mean less able residents choose to travel by car. In terms of climate change adaptation, the site is adjacent to areas of fluvial flood risk but is not directly affected on site. The site is free of surface water flood risk.
Historic environment	Site D1 is located well south of the village's historic core and away from the conservation area, and is also distant from any individual listed buildings or other designated heritage assets. Development at the site would therefore carry minimal risk of harm to the historic environment, though would also offer no real opportunities to support access to or understanding of the historic environment.
Landscape	The site has little exposure in the landscape due in part to views being screened by perimeter planting but also the flat landform of the surrounding area which limits oversight. In townscape terms the site could potentially offer an opportunity for development which has good regard for the form and character of the existing built area of the south of the village, though the site's current lack of development contributes to a transitional urban/rural fringe character at the south western approach to the village which could be impacted by inappropriate development. However, on balance it is considered that development would be unlikely to result in either notably negative or positive effects on the landscape SEA theme.
Land, soil and water resources	The site is mostly hardstanding with two substantial farm sheds occupying part of the centre of the site. The site is predominantly not in a natural state as it is largely covered by hard standing and currently in commercial use as a privately run car park or vehicle storage yard. In this sense directing development to Site D1 could help reduce land take of greenfield sites elsewhere and therefore make more efficient use of the available land. The site is not in agricultural use and it is considered that development at the site would be unlikely to affect water resources.
Population and community	The site offers an opportunity to deliver both new homes and new employment floorspace in the village which would help contribute to Long Melford's continued economic vitality. Development at the site would benefit from nearby access to the key community asset of Melford Country Park whilst also supporting access to services at the village centre for many residents.
Health and wellbeing	The site could have potential to support healthy and active lifestyles on the basis that there is car-free access to the village's services and facilities, though as noted above this may be beyond reasonable walking or cycling distance for some residents. As noted under the population and community SEA theme, the site also offers potential for easy access to the community outdoor space of Melford Country Park and this offers associated health and wellbeing benefits through recreation and outdoor activities.
Transport	As noted above, the site has potential to access village services and facilities via car-free footpaths, though is around 1.5km from the village centre. However, the site is in relatively close proximity to bus stops on the B1064 which are served by regular services between Sudbury and Bury St Edmunds. The site is well placed to access Sudbury via the existing cycle path along the alignment of the former railway line. This provides mostly car-free access to central Sudbury, around 3 miles away.

Site F1

Site size: 1.1 ha

Biodiversity	The site is open and undeveloped and forms part of a larger agricultural field in arable use, suggesting limited potential for biodiversity sensitivity. The site has hedgerow boundaries to the north, south and west though there could be potential to retain much of these through the development process, particularly to the north and south where no hedgerow removal would be necessary. The site does not contain and is not adjacent to any nationally or internationally designated biodiversity site though an area of Biodiversity Action Plan (BAP) priority habitat for Woodpasture and Parkland lies immediately to the south. It is considered that the site does not support notable potential for biodiversity itself and development could offer an opportunity to enhance the adjacent BAP priority habitat.	
Climate change	In terms of climate change mitigation, the site offers potential to minimise unnecessary car journeys via pedestrian access to services at the village centre. The site is served by existing bus stops on the B1064 which offers potential to reach higher tier service centres via sustainable transport. However, it is recognised that the easy access to the road network would likely encourage a proportion of journeys to be made by car. In terms of climate change mitigation the site is not affected by fluvial flood risk or surface water flood risk and development would not contribute to an increased risk of flooding elsewhere. The currently open and undeveloped nature of the site would necessarily be altered through allocation and development would introduce areas of hardstanding which can contribute to a heating effect. However, this has potential to be mitigated through the incorporation of areas of planting and green infrastructure into the final scheme.	
Historic environment	The site is located well south of the village's historic core and away from the conservation area. However, there are two Grade II listed buildings whose wider setting has potential to be affected by development at the site. Rodbridge House and its associated barn (which is also Grade II listed) lie south east of the site along Mills Lane. The barn faces away from the site and are unlikely to be directly affected by development, but Rodbridge House itself has a direct line of sight across the open fields towards the site, amplified by its position slightly higher in the landscape. Although there is some distance between the site and Rodbridge House, the landscape is open and rural, and development could change the outlook from Rodbridge and its wider historic setting. However, the distance involved and the potential to mitigate through screening and landscaping are considered to mean that potential for negative effects in relation to the historic environment is very limited in practice, though it is appropriate to conclude uncertain effects on the basis that the final design of any scheme on site will be a determining factor.	
Landscape	By virtue of being agricultural and undeveloped the site helps maintain the rural character of the southern approach to the village, and its openness supports views from the B1064 through to the higher open land to the east of the village, contributing to the village's broader setting and character. However, this should be viewed in the context of the ongoing development at north of Ropers Lane which faces the site across the B1064 and gives the site a more overtly built-up context, with existing development now facing the site as well as lying adjacent to the north. Nevertheless, there is potential for negative effects on the landscape setting of the village from development at the site. Effects will depend on design, layout and massing of the final scheme and are considered uncertain at this stage.	
Land, soil and water resources	The Neighbourhood Plan area as a whole is within a broader area of Grade 2 and Grade 3 agricultural land quality, though at Site F1 there have not been detailed surveys to differentiate the land into Grade 3a and 3b. This means the site has potential to be underlain by 'best and most versatile' agricultural land, the loss of which should be avoided where possible. The land is currently in productive agricultural use and development would necessitate the loss of this function. Consequently it is appropriate to identify the potential for negative effects through development at Site F1.	
Population and community	The site would deliver new housing at a location which offers the opportunity to access local services and facilities, helping to cater for existing and future residents' needs. The site has an indicative capacity of around 30 dwellings which would be sufficient to trigger affordable housing provision onsite or a commuted payment towards offsite provision under policy SP02 (Affordable Housing) of the submission joint Local Plan. A scheme of around 30 dwellings also offers potential opportunities to deliver a range of types and tenures of housing to help meet different needs within the community, including specific preference for 'less expensive market housing' and affordable housing. Furthermore, it is proposed that Site F1 include provision of new allotments, a popular community asset. Positive effects are anticipated.	

Health and wellbeing	<p>The site is around 1.5 kilometres from the key village centre services, including shops, the school and healthcare. There is direct pedestrian access via an existing footpath, though this may be a longer distance than many residents find comfortable to walk. The site offers good access to the rural public right of way network which supports walking as a relatively easy to access leisure choice. The site is also well located in close proximity to Melford Country Park at the south of the village, though there are not currently segregated traffic free footpaths by which to access the Country Park. Overall the site offers potential to facilitate some healthy lifestyle choices though its peripheral location at the village fringe could make walking a slightly less attractive option for some residents.</p>
Transport	<p>The site has potential to support sustainable transport choices by virtue of the potential to walk to village centre services and facilities and the conveniently located bus stops for regular services between Bury St Edmunds and Sudbury. However, as noted above, the walk to the village centre is around 1.5 kilometres which may be challenging for some residents, particularly those who are less able. This is partly mitigated by the presence of the bus stops which will enable quick access to the village centre, as well as to higher tier local service centres nearby. It is considered that although a range of local needs could potentially be met within the village it is likely that private car will remain the choice of many residents, particularly as the site is well located to access the local and strategic road network. The site is well placed to access Sudbury via the existing cycle path along the alignment of the former railway line. This provides mostly car-free access to central Sudbury, around 3 miles away.</p>

Site G1

Site size: <0.1 ha

Biodiversity	Site G1 is within the built area of the village but is not itself previously developed. This means that although it is an open grassy space it has no connectivity with the countryside beyond and is encircled by development. It is undeveloped but appears managed and is not in a natural or wild state. In this context it appears to have limited potential to support biodiversity habitats. The site is not proximate to any biodiversity designated sites or priority habitats.	
Climate change	The site performs well in relation to climate change mitigation as its central location within the village is considered likely to incentivise residents to walk to local services and facilities which are just metres away in many cases. Indeed, it may be that in some instances walking could represent a more convenient option than any other mode. In terms of climate change adaptation the site is not directly affected by fluvial flood risk, but areas of low surface water flood risk overlap with the site. These could potentially be mitigated through design and layout of the scheme to incorporate any areas of risk into open space.	
Historic environment	Although the site is set back from Hall Street and is screened from views to and from the historic core by existing buildings, it is within the conservation area and is close to several characterful, though un-listed, historic buildings. Therefore there is theoretical potential for some degree of harm to the historic environment, though existing development controls in the conservation area are considered likely to be effective at mitigating the risk from poor quality design or materials. Additionally, the sheltered and enclosed context of the site, with no sightlines through to the listed buildings and historic core of Hall Street, is considered to limit the potential for effects on the wider historic environment of the village. However, potential effects are uncertain as the final design and layout of a future scheme will be a key determinant.	
Landscape	The site has no landscape sensitivity due to its enclosed setting at the centre of the village with no views in from or out to the rural landscape beyond. However, as noted above, the site's location at the fringe of the village's historic core, gives it some theoretical potential for townscape sensitivity. In practice, however, the site makes no contribution to the historic street scene of Hall Street and whilst its current openness contributes to the localised character of Spicers Lane, a sensitively designed scheme is considered unlikely to be harmful in principle to this immediate context.	
Land, soil and water resources	Development at the site would be within the existing built footprint of the village, helping avoid land take at greenfield sites at the settlement fringe. Although the site is not previously developed, its location at the centre of existing development is considered to represent efficient and effective use of land by virtue of densifying development at what is effectively a 'backland' site.	
Population and community	The site's central location will help deliver development which is well placed to access the key services and facilities of the village, including shops, the surgery, pubs and bus stops. Residents will therefore be very well located to meet many of their day to day needs. Development at the site would not necessitate the replacement of any existing dwellings and would therefore deliver a positive net gain in housing for the village.	
Health and wellbeing	Development at the site would be well positioned to support access to the existing healthcare facilities at the Long Melford Practice doctors surgery which is around a five minute walk away. Additionally, the site's location would likely support healthy and active lifestyle choices by virtue of being close to key services, including the village school.	
Transport	For the reasons outlined above, positive effects are anticipated in relation to the Transport SEA theme, namely that the site could support modal shift towards walking and cycling for meeting many local needs, including accessing supermarkets and the primary school which can often both be traffic-generating services. Additionally, the site is well placed to access the frequent bus services between Sudbury and Bury St Edmunds which serve nearby Hall Street.	

Site H5

Site size: 22.4 ha

Biodiversity	There are no local, national or international designated biodiversity sites within the site boundaries, though much of the site is within the Impact Risk Zone (IRZ) of the Kentwell Woods Site of Special Scientific Interest (SSSI) around 500m away. This has implications for development of over 100 units, though would be mitigated by bringing forward a more limited scale of development on site. The site itself has little potential to support biodiversity as it is a large arable field in active use. Perimeter hedgerows appear well established though it is likely that the vast majority of these could be retained. In light of the fact that development could avoid negative effects on biodiversity if it remains below 100 units but that the site itself has capacity for far in excess of this the overall effects are uncertain at this stage and will depend on the scale of growth proposed.
Climate change	The site offers some potential to minimise unnecessary car journeys via pedestrian access to services at the village centre, though the distance to the centre is around 1.5 kilometres and could be beyond comfortable regular walking distance for some residents. The site is served by existing bus stops on High Street which offers potential to reach higher tier service centres via sustainable transport. However, it is recognised that the easy access to the road network would likely encourage a proportion of journeys to be made by car. The site is unaffected by fluvial flood risk, though small ribbons of surface water flood risk are evident at the site's perimeter and in isolated pockets of the site itself. In practice it is considered that this would be easily mitigatable through the design and layout of the scheme.
Historic environment	The site is in close proximity to a number of heritage assets, though by virtue of its open undeveloped nature it does not contain any historic assets itself. First, the site is immediately north of the Grade II* listed Melford Hall Registered Park and Garden (RPG) which is adjacent to most of the southern site boundary. There is thick planted screening between the site and the RPG though glimpsed views are possible in places and it is likely that greater inter-visibility will be possible during the winter months. A second RPG, Grade II* listed Kentwell Hall, lies to the west of the site, though the existing linear development along High Street as well as the severing effect of the road itself are considered to significantly limit the potential for direct effects from development at Site H5. The site's western and southern boundaries abut the Long Melford Conservation Area and some degree of landscape buffering would likely be necessary to soften the impact upon the conservation area setting. Additionally, the only potential access point from the site to High Street is immediately adjacent to a Grade II listed building and development of this access would likely result in negative effects on the setting of the building and its perception in the street scene. In this context, effects are considered to depend considerably on the scale, design and layout of the final scheme and are therefore uncertain at this stage.
Landscape	Given the size of the site, particularly in relation to the scale of the existing adjacent development, it is considered that there is significant potential for negative effects on both townscape and landscape. The present openness and rural character of the site are considered to make a contribution to the landscape setting of the north of the village, providing a characterful rural backdrop to the existing development along High Street and at the Harefield estate, as well as providing a landscape buffer between the busy A134 to the east of the site and the historic landscape and townscape context of the north of the village. In townscape terms, the existing townscape character is strongly informed by the linear pattern of development at the northern extent of the village which is characteristic of Long Melford. The site lies entirely behind existing dwellings and would therefore add depth to the currently linear settlement form, altering the traditional pattern of development away from its current form and character. In this context, negative effects are anticipated in relation to the landscape SEA theme.
Land, soil and water resources	The majority of the site is underlain by Grade 2 agricultural land which is currently in productive agricultural use. Development at the site would necessitate the loss of 'best and most versatile' land, potentially at scale given the size of the site. Negative effects are therefore anticipated in relation to the land, soil and water resources SEA theme.
Population and community	The site could deliver housing at scale, triggering affordable housing provision onsite or a commuted payment towards offsite provision under policy SP02 (Affordable Housing) of the submission joint Local Plan. The site is large enough to offer opportunities for delivering a range of types and tenures of housing to help meet different needs within the community.
Health and wellbeing	The site offers direct access to the rural public right of way network which can offer a range of physical and mental health benefits. Traffic free footpaths to the village centre offer potential to meet many local needs without the need to use a car, though in practice it is likely that this will not be convenient to many residents or for certain types of journeys.

Transport

The site currently has no direct vehicular access to the road network though this could potentially be achieved onto High Street / A1092 through the enhancement of an existing access point at the site's north west corner. However, establishing access at this point would give rise to issues in relation to visibility at the turning and in relation to the setting of the Grade II listed Thatched Cottage which is adjacent. Although the site's boundary is adjacent to the A134 as it bypasses Long Melford, it is considered unlikely that suitable direct access from the site could be achieved. The site is reasonably proximate to existing bus stops on Westgate Street but there is currently no direct access from the site as existing development at Harefield and along High Street prevents direct pedestrian access. There could be potential to explore pedestrian access to High Street via the existing public right of way running along the southern boundary of the site. At just over 1.5 kilometres from the village centre it is considered that walking and cycling access could be challenging for some less able residents, though there is a footpath which runs the length of High Street to the village centre.

Site K1

Site size: 1.7 ha

Biodiversity	There are no local, national or international designated biodiversity sites within the site boundaries, though the site is within the Impact Risk Zone (IRZ) of the Kentwell Woods Site of Special Scientific Interest (SSSI) around 400m to the north in relation to developments over 100 units. Site K1 does not have capacity for growth at such a scale and therefore does not present a risk to the SSSI. The site is encircled by established hedgerows with potential to support biodiversity, though much of these could be retained through the development process.	
Climate change	The site offers some potential to minimise unnecessary car journeys via pedestrian access to services at the village centre, though the distance to the centre is around 1.5 kilometres and could be beyond comfortable regular walking distance for some residents. The site is served by existing bus stops on the A1092 which offers potential to reach higher tier service centres via sustainable transport. However, it is recognised that the easy access to the road network would likely encourage a proportion of journeys to be made by car. The site is free of fluvial flood risk, though a small area of surface water flood risk is evident in the north east corner. This could be mitigated through the layout of the final scheme.	
Historic environment	The site has potential for sensitivity in heritage terms due to its location directly adjacent to the Grade II* listed Kentwell Hall Registered Park and Garden (RPG). Development could have potential to urbanise the setting of the RPG and the approach to it from the A134 to the north, though it is acknowledged that the existing dwellings either side of High Street contribute to a degree of built character on the approach to the entrance to the RPG. In this sense the form and layout of any future scheme could have potential to influence the effect on the historic environment.	
Landscape	The site has limited sensitivity in the wider landscape as it is not overlooked by higher ground and does not support views in from, or out towards, the landscape beyond. However, the site's openness contributes to the character of the approach to the village from the north. The east of High Street supports existing linear development, and development of the site would add corresponding development on the west of High Street. This could potentially introduce a greater sense of enclosure.	
Land, soil and water resources	An area of Grade 2 agricultural land underlies the site, though in practice the site does not appear to be in functional arable use and is remote from the wider countryside owing to the presence of the A1092 to the east and the Kentwell Hall RPG to the west. These factors, together with the site's relatively small size, are considered to make the site unlikely to have significant importance as productive agricultural land. It is considered that development would have a neutral effect on the land, soil and water resources SEA theme as a result.	
Population and community	The site is proposed for 66% affordable housing in a scheme of around 30 dwellings, offering potential opportunities to deliver a range of types and tenures of affordable housing to help meet different needs within the community. Significant positive effects in relation to the population and community theme are anticipated as a result.	
Health and wellbeing	The site is around 1.5 kilometres from the key village centre services, including shops, the school and healthcare. There is direct pedestrian access via an existing footpath, though this may be a longer distance than many residents find comfortable to walk. The site offers nearby access to the rural public right of way network which supports walking as a relatively easy to access leisure choice. Overall the site offers potential to facilitate some healthy lifestyle choices though its peripheral location at the village fringe could make walking a slightly less attractive option for some residents.	
Transport	The site has potential to support sustainable transport choices by virtue of the potential to walk or cycle to village centre services and facilities via continuous footpaths/pavements. However, as noted above, the walk to the village centre is around 1.5 kilometres which may be challenging for some residents, particularly those who are less able. This is partly mitigated by the presence of relatively nearby bus stops on Westgate Street which will enable quick access to the village centre, as well as to higher tier local service centres nearby. It is considered that although a range of local needs could potentially be met within the village it is likely that private car will remain the choice of many residents, particularly as the site is well located to access the local and strategic road network.	

Site L1

Site size: 0.1 ha

Biodiversity	Site L1 is a brownfield site in the built area of the village comprised of an area of hardstanding serving a cluster of garage or workshop-style structures. The site is not near to any designated biodiversity sites and does not support any notable planting or natural habitat. The site has no notable biodiversity sensitivity.	
Climate change	The site performs well in relation to climate change mitigation as its central location within the village is considered likely to incentivise residents to walk to local services and facilities which are just metres away in many cases. It may be the case that in some instances walking could represent a more convenient option than any other transport mode. In terms of climate change adaptation the site is not directly affected by fluvial or surface water flood risk.	
Historic environment	Site L1 is immediately east of a number of Grade II listed buildings which line historic Hall Street in the centre of the village. Despite this, the site's direct contribution to the historic street scene is limited as it faces onto a section of Cordell Road with little historic continuity and a muted historic character. Nevertheless, the location is within the conservation area and whilst this suggests that development could carry an inherent risk of harm to heritage assets, it is considered that there is also an opportunity to enhance the setting of the conservation area through improving the currently poor quality development on site. Consequently potential effects are considered uncertain and will be determined by design.	
Landscape	The site has no landscape sensitivity due to its location at the centre of the village with no views in from or out to the rural landscape beyond. However, as noted above, the site's location at the fringe of the village's historic core, with partial views to historic buildings on Hall Street to the west, gives it some potential for townscape sensitivity. The site is currently of poor quality and contributes little to the street scene. This suggests strong potential for development to make a positive contribution to townscape through the revitalisation of a poor quality site, though the potential heritage sensitivity of the wider location will likely mean that any eventual impact on townscape will be strongly influenced by design and layout of a future scheme. Although there are multiple influences on the character of Cordell Road in terms of style, plot size, and era of construction, it is again considered that the design and layout of development will determine whether the effect is positive or negative. Effects are therefore uncertain.	
Land, soil and water resources	Positive effects are anticipated in relation to the land, soil and water resources SEA theme on the basis that the site offers an excellent opportunity to deliver growth at a previously developed site within the built area, reducing the need for land take at greenfield sites at the edges of the settlement. It is considered that development at Site A1 is unlikely to have any notable effects on water resources and will have no effect at all on agricultural land.	
Population and community	The site's central location will help deliver new homes which are well placed to access the key services and facilities of the village, including shops, the surgery, pubs and bus stops. Residents will therefore be very well located to meet many of their day to day needs. Development at the site would not necessitate the replacement of any existing dwellings and would therefore deliver a positive net gain in housing for the village. The site is proposed for specialist elderly accommodation which will contribute to meeting a range of needs within the community.	
Health and wellbeing	Development at the site would be very well positioned to support access to the existing healthcare facilities at the Long Melford Practice doctors surgery which is a short distance further along Cordell Road. Additionally, the site's location would likely support healthy and active lifestyle choices by virtue of being close to key services, including the village school.	
Transport	For the reasons outlined above, positive effects are anticipated in relation to the Transport SEA theme, namely that the site could support modal shift towards walking and cycling for meeting many local needs, including accessing supermarkets and the primary school which can often both be traffic-generating services. Additionally, the site is well placed to access the frequent bus services between Sudbury and Bury St Edmunds which serve nearby Hall Street.	

Summary of SEA site assessment

4.30 The following table presents a summary of the findings of the SEA assessment of the potential site options.

Table 4.2 Summary of SEA site appraisal findings

Site	Bio-diversity	Climate change	Historic env	Landscape	Land, soil and water resources	Population and community	Health and wellbeing	Transport
Site A1								
Site C1								
Site D1								
Site F1								
Site G1								
Site H5								
Site K1								
Site L1								
Key								
Likely adverse effect (without mitigation measures)					Likely positive effect			
Neutral/no effect					Uncertain effects			

Assessment of reasonable alternatives

4.31 In light of the above assessment, it is considered that Sites A1, G1 and L1 should be held as constants across the reasonable alternatives. They each deliver growth on brownfield sites in the centre of the village, recorded the strongest performance in the Parish Council's site assessment exercise and are considered appropriate in principle to allocate. However, these three sites collectively deliver only 7 dwellings, which would not enable the Parish Council to meet identified local needs or deliver new community facilities. Therefore, there is a need to explore allocation of additional sites.

4.32 Therefore, the spatial strategy options considered as reasonable alternatives for Long Melford are as follows:

Table 4.3 Number of dwellings provided under each of the reasonable spatial strategy alternatives

		Option 1	Option 2	Option 3	Option 4
Sites held constant	Site A1	3	3	3	3
	Site G1	1	1	1	1
	Site L1	3	3	3	3
'Variable' sites	Site D1	10	10	-	-
	Site F1	-	30	-	-
	Site K1	-	30	-	-
	Site C1	-	-	150	-
	Site H5	-	-	-	150
Total housing delivery		17	77	157	157

- Option 1:** Sites A1, G1 and L1 (held constant) plus site D1.
17 dwellings plus employment floorspace.
Low housing growth option.
- Option 2:** Sites A1, G1 and L1 (held constant) plus sites D1, F1 and K1.
77 dwellings plus employment floorspace.
Preferred option.
- Option 3:** Sites A1, G1 and L1 (held constant) plus site C1.
Around 157 dwellings.
Higher housing growth option.
- Option 4:** Brownfield sites A1, G1 and L1 (held constant) plus site H5.
Around 157 dwellings.
Alternative higher housing growth option.

4.33 The sites *not* held as constant are variables, i.e. are switched on and off under each scenario. Site D1 was the only one of these variable sites which both passed the strategic site assessment **and** was found to be available for development (i.e. where landowner support could be demonstrated). On this basis it is appropriate to test a growth option which comprises available sites which have been found to be the most sustainable, i.e. Sites A1, G1, L1 **plus** Site D1. This package of sites comprises Option 1.

- 4.34 Sites D1, F1 and K1 are added to the sites held as constant to comprise Option 2. Site D1 is again included on the basis that it performs well against the strategic site assessment tests, whilst Sites F1 and K1 are also included on the basis of their significant potential to contribute to meeting the objectives of the plan despite their lower scores on the site assessment exercise.
- 4.35 Site C1 has a notable planning history. Since the start of plan-making in Long Melford the site has been subject to a planning application (reference number DC/18/00606) for 150 homes, which was refused by Babergh District Council. However, this decision was overturned on appeal, an outcome subsequently upheld in April 2020 by the Secretary of State after the appeal was recovered for his determination.
- 4.36 Although planning permission has therefore now been granted at the site, the submission draft of the Neighbourhood Plan retains the preferred strategy developed prior to the appeal being determined. Consequently, it remains appropriate to test a scenario which includes Site C1 to fully understand the performance of all alternatives as they stood when the preferred strategy was originally selected. An option which includes the 'constant' sites **plus** Site C1 comprises Option 3.
- 4.37 Site H5 is also understood to have attracted developer interest. Although the specific circumstances of the site are different from those of Site C1 as it has no recent planning history, an option which allocates Site H5 would achieve an entirely different distribution of growth than any of the other three options and it is appropriate to test this scenario to enable meaningful comparison. An option which includes the 'constant' sites **plus** Site H5 comprises Option 4.

Option 1: Sites A1, G1 and L1 plus site D1. 17 dwellings. Low growth option.

Option 2: Sites A1, G1 and L1 plus sites D1, F1 and K1. 77 dwellings. Preferred option.

Option 3: Sites A1, G1 and L1 plus site C1. Around 157 dwellings. Higher growth option.

Option 4: Sites A1, G1 and L1 plus site H5. Around 157 dwellings. Alternative higher growth option.

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference			
		Opt 1	Opt 2	Opt 3	Opt 4
Biodiversity	<p>The Neighbourhood Plan area is not notably constrained by biodiversity designations. All four development options include a majority of sites which are either previously developed land or in agricultural use, neither of which are land uses which generally support significant potential for biodiversity sensitivity in their own right. However, Option 4 is considered to have the greatest potential for adverse effects on the Biodiversity SEA theme as it focuses growth at Site H5 which is within the Impact Risk Zone (IRZ) of the Kentwell Woods SSSI and Lineage Wood & Railway Track SSSI to the north. The IRZs at this location identify the potential for risks to the SSSI from development of 100 units or greater; this is notable given the assumed potential of Site H5 to accommodate around 150 dwellings. Option 1, Option 2 and Option 3 each direct development to locations with no notable effect on nationally or internationally designated sites, though there could be potential for localised effects on the Railway Walks Local Nature Reserve through increased recreational pressure. Although Option 3 would deliver a higher quantum of growth it is considered that it performs broadly on a par with Options 1 and 2 in relation to the Biodiversity SEA theme as growth would be concentrated at Site C1, offering potential to secure financial contributions towards enhancing the LNR or potentially providing alternative recreational space within the development. Although Site H5 could also have potential to secure financial contributions, it is considered to have greater potential for adverse effects on the Kentwell Woods and Lineage Wood & Railway Track SSSIs. Therefore it is considered that Options 1, 2 and 3 perform most strongly in relation to the Biodiversity SEA theme, with Option 4 performing least strongly.</p>	=1	=1	=1	4

<p>Climate change</p>	<p>In terms of climate change mitigation, Option 1 is considered to perform most strongly as it focuses growth at mostly brownfield sites and is the lowest growth option. In the context of Long Melford it is considered that this suggests the option will make a negligible contribution to emissions from the built environment. Option 3 focusses growth at Site C1, as well as the three brownfield sites held constant across all three options. Site C1 is large, so whilst the south of the site is naturally further from the village centre than the north the site as a whole is considered to be within reasonable walking distance of village centre services. The site is considered to be a location with a degree of potential to minimise car dependence by supporting walking and cycling to local services, though it will introduce significant new growth suggesting a net increase in car users is likely as well as an increase in emissions from the built environment. Option 2 distributes growth between several small sites, including K1 at the far north of the village and D1 at the far south, both of which may have limited potential to minimise car dependency. Option 4 directs growth to Site H5 which is at the far north of the village, again nearly 2km from the village centre. Though some limited services would be accessible at Melford Green, the bulk of facilities are situated further south along Hall Street, likely to be less accessible by pedestrians from Site H5 by virtue of the greater distance to travel. It is recognised that as Long Melford is a relatively small settlement, many needs will continue to be met outside the village and that all options will likely have a degree of car dependence in respect of these needs.</p> <p>In terms of climate change adaption, all options avoid allocating sites which are directly affected by the two principal areas of fluvial flood risk, namely the corridors of land adjacent to the River Stour west of the village and Chad Brook to the north. Site D1, allocated under Option 1 and Option 2, is immediately adjacent to an area of medium risk (i.e. an annual risk of between 1% and 3.3% of a flood event) though an open space buffer could likely be provided if necessary. Similarly, all options largely avoid directing growth to areas affected by surface water flood risk. The perimeter of Site H5, delivered under Option 4, is partially affected by surface water flood risk, though this is considered unlikely to affect the development potential of the site itself. On this basis it is considered that all options perform broadly on a par in relation to supporting resilience to flooding.</p> <p>Increased risk of flooding is just one aspect of climate change and it is important to also be mindful of the need to adapt to other aspects of a warming climate, particularly in relation to the contribution of development to urban cooling. Larger developments can have potential to make a more significant contribution to cooling the built environment through design features such as incorporating areas of green space, planting and shade. In this context, Options 3 and 4, as the options which direct growth to larger sites, are considered to have greater potential to incorporate cooling features through the development process. However, development under either Option 3 or Option 4 should be viewed in the context of the majority development being directed to large greenfield sites i.e. Site C1 under Option 3 and Site 4 under Option 4. Any development at these sites will necessarily result in an increase in built area and hardstanding regardless of cooling measures which could be integrated into development.</p> <p>In light of the above, it is considered that on balance Option 1 performs most strongly in relation to the climate change SEA theme as it will deliver development with limited potential to contribute to climate change from activities within the plan area, Options 2 and 3 perform broadly on a par with each other whilst Option 4, by virtue of having less potential to minimise contributions to climate change from activities within the plan area, is considered to perform less strongly.</p>	<p>1</p>	<p>=2</p>	<p>=2</p>	<p>4</p>
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Option 1: Sites A1, G1 and L1 plus site D1. 17 dwellings. Low growth option.

Option 2: Sites A1, G1 and L1 plus sites D1, F1 and K1. 77 dwellings. Preferred option.

Option 3: Sites A1, G1 and L1 plus site C1. Around 157 dwellings. Higher growth option.

Option 4: Sites A1, G1 and L1 plus site H5. Around 157 dwellings. Alternative higher growth option.

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference			
		Opt 1	Opt 2	Opt 3	Opt 4
Historic environment	<p>Option 4 focusses growth at the north of the village and is therefore notable for directing significant growth to within close proximity of Melford Hall and Kentwell Hall, both of which are Grade II* listed Registered Parks and Gardens (RPGs) at the north of the village. Whilst the direct visual impact from growth under Option 3 could likely be mitigated to an extent through landscaping and design, the option nevertheless represents significant urbanisation of a part of the village which has notable and distinctive heritage sensitivities. Overdevelopment at the north of the village could negatively affect the broader landscape and townscape context of the two RPGs which is considered to make an important contribution to their historic character.</p> <p>By focussing growth to the south east of the village, Option 3 delivers development largely outside the historic core and consequently avoids direct effects on the majority of individual designated historic assets. However, the landform at the south east of the village rises up to 20m above the level of Hall Street as it runs through the village, giving the area a prominent role in contextualising the historic core of the village and helping preserve the rural setting of the approach to the village from the south. Development at Site C1 under Option 3 could therefore have secondary effects on the historic character of the village. Option 2 disperses growth between smaller sites considered to have mostly limited potential for effects in relation to the historic environment. This is on the basis that by dispersing growth throughout the village to smaller sites the effects of growth are likely to be less pronounced than by concentrating growth at single large sites at the village fringe with lower associated potential to alter the prevailing historic character of the village. However, Option 2 delivers Site K1 which is located within the Conservation Area and adjacent to the Kentwell Hall Registered Park and Garden and could have potential heritage sensitivity in this context. Option 1 is therefore considered to perform most strongly in relation to the historic environment SEA theme as the only variable site delivered would be Site D1 at which there is no notable heritage sensitivity.</p>	1	2	3	4

<p>Landscape</p>	<p>Option 1 and Option 2 direct the majority of growth to small sites either within the existing urban area or which have good regard for the established settlement pattern. This distribution of development is considered unlikely to have potential for notable landscape effects, though this could depend to an extent on the design, layout and massing of any future schemes. Development within the built area could have potential for effects on townscape, given the distinctive historic character of much of the village, though again it is considered that harmful effects will depend on detailed design matters.</p> <p>Option 4 has potential for adverse landscape effects as it directs the majority of growth to the large greenfield Site H5 at the north of the village with clear potential to change the undeveloped character of the site and its surrounds. Although much of Site H5 is relatively discreet within the landscape, owing to its flat landform and the fact it is partially screened from High Street by existing development, its scale gives rise to potential for transformative development. At present the site’s openness is considered to contribute to the setting and character of the north of the village, providing a broad landscape buffer between the heritage assets of this part of the village and the urbanising influence of the A134 by-pass to the east, whilst also preserving the characteristic linear settlement pattern of the High Street area of the village. Therefore, it is considered that the size and location of Site H5 give rise to potential adverse effects from Option 4, both in broad townscape character terms and also specifically in relation to the landscape setting of Melford Hall RPG.</p> <p>Option 3 is considered to have clear potential for significant adverse effects on landscape due to the size, topography and prominence of Site C1, as well as its relationship with the existing settlement pattern of the village. The site rises up and away from the B1064 to the east, placing it higher in the landscape than the existing built area and giving it the perceived effect of overlooking the south of the village. This effect is most pronounced on the southern approach to the village centre where a series of full or glimpsed views of the site are possible to the east, providing a rural backdrop to existing ribbon development at the village’s southern fringe and projecting a strong rural character into the village, even as existing development activity to the west of the B1064 intensifies. As this existing development activity progresses, the role of Site C1 in maintaining the rural context to the south east of the village will likely be amplified further. Partial views into the site are also possible from existing dwellings at Roman Way to the north west of the site, whilst limited views are also possible from a public right of way running along the entire north east boundary of the site, though views over the full site are not possible from here owing to the landform of the area.</p> <p>A key landscape feature of the village is the alignment of the former Stour Valley Railway, which is now a wooded corridor designated as the Railway Walk Local Nature Reserve. The former railway line represents a striking eastern boundary to the village, serving as a distinctive and durable feature marking the village’s eastern extent. It is clear from the form of the village that the former railway line has been a significant influence over its development, with the majority of growth directed to the area bounded by the railway to the east, Bull Lane to the north and the B1064 to the west. Development at Site C1 would mark the first substantial incursion beyond this well-defined eastern boundary with corresponding implications for the established settlement pattern. The absence of a further rational eastern boundary feature could give rise to further growth in future plan periods which stretches further south and east, with the potential for a perceptual narrowing of the gap between Long Melford and Sudbury. In light of the above, it is considered that Option 3 performs notably poorly in relation to the landscape SEA theme.</p>	<p>=1</p>	<p>=1</p>	<p>4</p>	<p>3</p>
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Option 1: Sites A1, G1 and L1 plus site D1. 17 dwellings. Low growth option.

Option 2: Sites A1, G1 and L1 plus sites D1, F1 and K1. 77 dwellings. Preferred option.

Option 3: Sites A1, G1 and L1 plus site C1. Around 157 dwellings. Higher growth option.

Option 4: Sites A1, G1 and L1 plus site H5. Around 157 dwellings. Alternative higher growth option.

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference			
		Opt 1	Opt 2	Opt 3	Opt 4
Land, soil and water resources	<p>A key tenet of ensuring the most efficient use of available land is ensuring that new development is directed away from the best and most versatile (BMV) agricultural land where possible. The Agricultural Land Classification groups land into six tiers of quality, with Grades 1 to 3a recognised as BMV land, whilst Grades 3b to 5 are of poorer quality. Long Melford village is underlain by an area of Grade 3 land (though it has not been subdivided into 3a and 3b) whilst areas of Grade 2 land are evident to the south east and north of the village. In this context, both Options 3 and 4 direct the majority of growth to areas of potential BMV land, suggesting that growth under either option could lead to the loss of high quality agricultural land currently in productive use. Option 1 is therefore considered to perform most strongly in relation to the loss of BMV land, as the majority of growth will take place either within the built area or on poorer quality agricultural land, whilst Option 2 performs less strongly on the basis it includes the same non-sensitive sites plus a small area of productive agricultural land at Site F1.</p> <p>It is noted that the emerging Suffolk Minerals and Waste Local Plan appears to expand the Minerals Consultation Area (MCA) at Long Melford parish to cover the whole built area of the village and its environs. This represents a departure from the adopted Suffolk Minerals Core Strategy in which neither the existing built area or any of the Options fall within the MCA. However, it is considered that under either interpretation of the extent of the MCA it is not relevant to selecting a preferred option as it does not help to differentiate between the Options.</p> <p>In light of the above it is considered that Option 1 performs most strongly in relation to the land, soil and water resources SEA theme. This is because it focuses growth to brownfield and non-agricultural land, making efficient use of the available land and avoiding potential loss of best and most versatile agricultural land. Option 2 is considered to perform more weakly than Option 1 whilst Options 3 and 4 perform notably more weakly again, though broadly on a par with each other on the basis that they each have potential to result in the loss of BMV land.</p>	1	2	=4	=4

Population and community	<p>A key consideration is the delivery of new homes to meet identified housing needs, including the needs of different groups within the community. In particular, higher growth options are likely to include more significant opportunities to deliver affordable housing as well as specialist accommodation such as gypsy and traveller pitches or elderly accommodation (where the need for such facilities is supported by recent evidence). It is also important to consider whether new development will be directed to locations from which key services and facilities can be readily accessed. Higher growth options can potentially give rise to opportunities to deliver more significant community infrastructure, particularly if this growth is focussed towards large sites with capacity to provide facilities on site and with potential to secure greater financial contributions. Additionally, delivering new employment floorspace can have positive effects in relation to population and community by maintaining and enhancing the social and economic vitality of the plan area.</p> <p>Therefore, Option 1 is considered to perform least strongly in relation to the population and community SEA theme on the basis that it delivers the lowest growth and disperses this growth between small sites. It is considered that this approach could limit opportunities to secure new community infrastructure. Option 2 performs more strongly as it delivers higher growth than Option 1 and includes Site K1 which is proposed to come forward for 66% affordable housing to meet local needs. However, as Options 3 and 4 focus growth at large sites which would theoretically attract 35% affordable housing should the adopted policy position be continued in the submission Local Plan, it is considered that Option 2's inclusion of Site K1 does not outweigh the potential for new community infrastructure delivered under Options 3 and 4. Both options would deliver new employment floorspace at Site D1 which is a minor positive.</p> <p>Option 3 is considered to perform most strongly as it directs the majority of growth to Site C1 from which community services and facilities at the village centre could be relatively easily reached. This is in addition to the potential of Site C1 to deliver new community infrastructure within the development or to contribute to enhanced community infrastructure off site through financial contributions. This is considered to outweigh the benefits of new employment floorspace under Options 1 and 2.</p> <p>Option 4 also has potential to deliver new community infrastructure, either on site or through contributions to off site enhancements. However, by directing the majority of growth to Site H5 at the northern extent of the village, Option 4 is considered to offer less potential for enhancing access to village centre services. A key consideration under the Population and Communities SEA theme is the delivery of housing which meets the needs of different groups within the community. As the option which delivers the highest quantum of development, Option 4 clearly performs well in this regard as a higher quantum of growth offers greater potential for a diverse mixture of housing types and tenures. However, housing growth alone is only one element to consider, and high growth in a poorer location is unlikely to be the best option overall. Accordingly, it is considered that on balance Option 3 performs most strongly in relation to the Population and Communities SEA theme as it has potential to deliver a significant quantum of housing, whilst also directing this growth to a more central location nearer to village services.</p>	4	3	1	2
Health and wellbeing	<p>All of the options provide opportunities to access the extensive public right of way network surrounding the village. Public rights of way can make a meaningful contribution to both health and wellbeing through the benefits to physical and mental health of regular exercise and access to the natural environment. Options 1 and 2 have the additional benefit of directing a proportion of growth to sites D1 which is adjacent to Melford Country Park and its range of recreational opportunities. As has been noted in relation to other SEA themes, Option 3 delivers growth at a location likely to be reasonably well placed for walking and cycling to the village centre, including the village school and health centre to which a large number of regular journeys would likely be made. This could encourage residents to make healthy choices in relation to many of their key journeys within the village. There could be potential to enhance walking and cycling links with the village centre from Site C1 to further incentivise healthy travel choices. Option 4 is considered less likely to</p>	=1	=1	2	3

Option 1: Sites A1, G1 and L1 plus site D1. 17 dwellings. Low growth option.

Option 2: Sites A1, G1 and L1 plus sites D1, F1 and K1. 77 dwellings. Preferred option.

Option 3: Sites A1, G1 and L1 plus site C1. Around 157 dwellings. Higher growth option.

Option 4: Sites A1, G1 and L1 plus site H5. Around 157 dwellings. Alternative higher growth option.

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference			
		Opt 1	Opt 2	Opt 3	Opt 4
	support healthy travel choices or enable access to healthcare within the village as Site H5 is further from village shops and likely to be beyond reasonable walking distance from the village school for many and is more distant from the doctors' surgery in the village.				
Transport	As noted in relation to several SEA themes, the four options are likely to provide differing levels of support for walking and cycling, with Option 1 considered to perform marginally most strongly in this regard on the basis of concentrating the highest proportion of growth at sites which are close to services and facilities at the village centre. This will help reduce the need to travel by ensuring that many day-to-day needs can be fulfilled without having to travel to other service centres. Option 3 , meanwhile, focusses high growth at Site C1 from which there could be some potential to deliver new walking and cycling connections to the village centre, though the southern extent of the site may be too far for easy walking and cycling access to the village core. Although Option 2 delivers growth at Sites D1 and K1 which are slightly further from the village centre, Site D1 benefits from proximity to frequent bus services to village services and higher tier service centres (as well as access to the popular cycle path to Sudbury along the former railway line), whilst Site K1 has unbroken pedestrian access to the village centre, though is served less conveniently by less frequent public transport. Option 4 performs most weakly in relation to promoting sustainable transport and reducing the need to travel on the basis that it focusses the greatest proportion of growth at the site furthest from the village centre and has less frequent bus services than Option 3, the other high growth option. Overall it is considered that Option 1 performs most strongly in relation to the transport SEA theme, Option 2 and Option 3 perform broadly on a par and Option 4 performs least strongly.	1	=2	=2	4

Summary of assessment

The assessment finds that **Option 4** stands out as the weakest performing of the strategy options. Whilst the ranking under each SEA theme does not represent a tally, meaning the overall performance of each option is not the sum of its individual rankings under each theme, it is notable that Option 4 is found to be either the weakest or equal weakest option in relation to every theme other than landscape (where it ranks second). Option 4 is therefore demonstrably not the most sustainable way for Long Melford to deliver growth over the plan period and can be discounted. **Option 1** fails to meet housing need in Long Melford and would be unlikely to provide a level of growth under which new services and community facilities could be secured. In this context Option 1 performs notably weakly in relation to the population and communities SEA theme and the Option can also be discounted.

Option 3 performs well in relation to the climate change, population and communities and transport SEA themes, largely reflecting its location within reasonable walking distance of village centre services and good proximity to regular local bus services. However, most significantly, Option 3 performs very poorly in relation to the landscape SEA theme and significant negative effects are anticipated in relation to landscape under Option 3. The setting and character of the village are considered to be most notably impacted.

Option 1: Sites A1, G1 and L1 plus site D1. 17 dwellings. Low growth option.

Option 2: Sites A1, G1 and L1 plus sites D1, F1 and K1. 77 dwellings. Preferred option.

Option 3: Sites A1, G1 and L1 plus site C1. Around 157 dwellings. Higher growth option.

Option 4: Sites A1, G1 and L1 plus site H5. Around 157 dwellings. Alternative higher growth option.

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference			
		Opt 1	Opt 2	Opt 3	Opt 4

In this context the assessment finds that **Option 2** stands out as the strongest performing option. It meets and exceeds housing need, distributes growth throughout the village to sites in the north, south and centre of the settlement and is likely to ensure a significant delivery of affordable housing.

Preferred approach in the Neighbourhood Plan in light of the assessment findings

4.38 The sites proposed for allocation in the Neighbourhood Plan are listed below:

- Site A1 (Cordell Road, adjacent to rear of Bull Hotel)
- Site D1 (Land in Borley Road)
- Site F1 (Land east of Rodbridge Hill and opposite Ropers Lane)
- Site G1 (Spicers Lane)
- Site K1 (Land west of High Street)
- Site L1 (Cordell Road)

4.39 These six sites were identified from the pool of sites options that the Parish Council's site assessment exercise found to be potentially suitable for development. Individually, the preferred sites are considered to align best with the Plan's objectives and the combination of these six sites performs most strongly when tested against the reasonable alternatives.

4.40 On this basis, a spatial strategy option similar to **Option 2** is selected as the preferred approach by the Neighbourhood Plan Steering Group in order to achieve a sustainable distribution of growth within the plan area.

5. Appraisal findings at this stage

Introduction

5.1 The Neighbourhood Plan contains **26** policies, listed below:

Policy theme	Policy
Sustainable growth and housing	LM 1 Growth and Sustainable Development
	LM 2 Allocation of Sites for Development: G1, Spicers Lane
	LM 3 Allocation of Sites for Development: L1, Cordell Road
	LM 4 Allocation of Sites for Development: A1, Cordell Road, adjacent to rear of Bull hotel
	LM 5 Allocation of Sites for Development: D1, Land in Borley Road
	LM 6 Allocation of Sites for Development: K1, Land west of High Street
	LM 7 Allocation of Sites for Development: F1, Land east of Rodbridge Hill and opposite Ropers Lane
	LM 8 Impact and Character of Developments
	LM 9 Affordable Housing
	LM 10 Housing Reserved for Local People
	LM 11 Provision of Less Expensive Market Housing
	LM 12 Addressing Flood Risk
	LM 13 Encouraging Biodiversity
	LM 14 Protection of Rural Gap
	LM 15 Mitigating Development Impact
Traffic and parking	LM 16 Sustainable Travel
	LM 17 Parking Guidelines
	LM 18 Charging Points in New Developments
Village services and facilities	LM 19 Designation of Local Green Spaces
	LM 20 Provision of New Green Spaces
	LM 21 Provision of Outdoor Play Equipment
	LM 22 Protection and Enhancement of Public Rights of Way
Business and tourism	LM 23 Support for the Local Economy
	LM 24 Change of Use: Residential to Employment
	LM 25 Change of Use: Employment to Residential

5.2 It should be noted that the iterative nature of plan making and SEA has given rise to opportunities for the SEA to appraise earlier versions 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. For clarity, and to ensure the influence of the SEA on the plan making process is evidenced in a clear and accessible manner, these recommendations are set out in Table 5.1 overleaf.

Table 5.1 List of recommended amendments which have been incorporated into the submission version of the Neighbourhood Plan (these recommendations have subsequently been addressed and this record is retained simply to demonstrate how the SEA has informed the final draft of the Neighbourhood Plan – therefore, the policy names and numbers reflect the original version against which the recommendation was made).

Policy	Recommended action	Outcome
Former Policy LM-H5 (Allocation of Site D1) – as at March 2020	Given that Ropers Lane would provide the only pedestrian access to the village centre the policy could therefore be strengthened if the policy wording were amended to include a more explicit requirement for pedestrian access to Ropers Lane be retained through the development process.	Policy amended in final draft
Former Policy LM-H6 (Allocation of Site K1) – as at March 2020	As Site K1 is within the conservation area it is recommended that former Policy LM-H6 takes a similar approach to former policies LM-H2, LM-H3 and LM-H4 to make it clear that there should be no detrimental effect on the conservation area from development on site	Policy amended in final draft
Former Policy LM-H6 (Allocation of Site K1) – as at March 2020	It is recommended that the current policy 'recommendation' to pursue archaeological evaluation is either deleted or strengthened into a requirement to increase clarity for future applicants and decision makers. Alternatively, there could be potential to incorporate the current wording into the supporting text rather than the policy text itself.	Policy amended in final draft
Former Policy LM-H8 (Contingent Allocation of Sites, Northern Fringe of Sudbury) – as at March 2020	Potential conflict with former Policy LM-H14 identified. Recommended that this is addressed to provide clarity.	Policy deleted from final draft
Former Policy LM-H14 (Local Green Space) – as at March 2020	Potential conflict with former Policy LM-H8 identified. Recommended that this is addressed to provide clarity.	Policy amended in final draft
Former Policy LM-V2 (Protection of Green Spaces) – as at March 2020	The policy may perform more strongly if it were to recognise the potential of some of these sites to support biodiversity, and the corresponding potential to seek net gain where appropriate (i.e. not all features would be likely to have an inherent biodiversity value by the nature of their function, such as sports pitches).	Policy amended in final draft
Former Policy LM-V3 (Provision of Green Spaces) – as at March 2020	Whilst the main policy intent relates to recreation and amenity, there are likely to be secondary effects in relation to biodiversity by virtue of maintaining natural spaces for wildlife through the development process.	Policy amended in final draft
Former Policy LM-V3 (Provision of Green Spaces) – as at March 2020	The policy has potential for positive effects but would be strengthened if it were to more explicitly identify some of the multi-functional benefits it is seeking.	Policy amended in final draft
Policy LM11 (Provision of Less Expensive Housing) – as at April 2021	The policy requires developers to provide estimated sales prices to the Parish Council. Potentially unreasonable and ineffective.	Policy amended in final draft

- 5.3 The submission Neighbourhood Plan policies are assessed below under eight headings, one for each of the SEA themes identified through the scoping process.

Biodiversity

- 5.4 The biodiversity SEA objective seeks the protection and enhancement of all biodiversity and geological features, including achieving a net gain in biodiversity through the development process and supporting ecological networks in the Neighbourhood Plan area where possible. The distribution of growth through the preferred strategy is considered likely to perform well against this objective, as growth will be focussed at brownfield sites or greenfield sites with little apparent biodiversity sensitivity. Growth is directed away from sites of notable potential for biodiversity sensitivity, particularly the Kentwell Woods, Glemsford Pits and Lineage Wood and Railway Track Sites of Special Scientific Interest (SSSIs)
- 5.5 A number of policies could have potential for effects in relation to the biodiversity SEA theme. There is clear potential for positive effects from **Policy LM 13** (Encouraging Biodiversity), which encourages design features which “*provide gains to biodiversity*”. The policy recognises the potential for the development process to embed planting and landscape features which support wildlife into new schemes, including the potential for new development to contribute to building habitat networks by “*enabling the movement of species*”. The policy sets an aspirational but deliverable benchmark for new development and is far-sighted in its recognition of the role that individual sites can play in creating or enhancing strategic habitat networks. Positive effects are anticipated in relation to the biodiversity SEA theme.
- 5.6 Other policies could have potential for less direct effects. **Policy LM 19** (Designation of Local Green Spaces) identifies several of the villages open space features for protection, ranging from Local Nature Reserves to local ‘green frontages’ to sports pitches. Although the primary focus of the policy is preserving the openness of these multifunctional features to secure their community benefit there is clearly potential for positive effects in relation to biodiversity as well. For example, the Long Melford Country Park (which is dual-designated as a Local Nature Reserve) and the Railway Walk Local Nature Reserve are important features of Long Melford’s green infrastructure offer. Whilst their functions include recreation and education, they are also important habitats and form part of the wider habitat network for some species. Minor positive effects are anticipated.
- 5.7 Similarly, **Policy LM 20** (Provision of New Green Spaces) could also have potential for positive effects by virtue of seeking the delivery of multifunctional green space in new development. Again, whilst the main policy intent relates to recreation and amenity, there are likely to be secondary effects in relation to biodiversity by virtue of maintaining natural spaces for wildlife through the development process.
- 5.8 It is considered that the Neighbourhood Plan is likely to have a **minor positive effect in relation to the biodiversity SEA theme**.

Climate change

- 5.9 The climate change SEA objectives have a dual focus of reducing the contribution of the Neighbourhood Plan area to climate change and supporting resilience to the potential effects of climate change, particularly flooding. In practice, taking steps to minimise emissions from the built environment can be one way for development plans to contribute to climate change mitigation. Adapting to the effects of climate change includes ensuring development is directed away from areas at greatest risk of flooding, limiting effects of extreme weather and reducing urban heat island effects.
- 5.10 In terms of mitigating climate change, per capita greenhouse gas emissions generated in the Neighbourhood Plan area may continue to decrease with the wider adoption of energy efficiency measures, renewable energy production and new technologies. However, increases in the built footprint of the Neighbourhood Plan area would contribute to increases in the absolute levels of greenhouse gas emissions. However, the level of development proposed through **Policy LM 1** (Growth and Sustainable Development) will not lead to significant increases in greenhouse gas emissions over and above that would be seen otherwise.
- 5.11 The plan will not deliver a quantum of homes sufficient to unlock opportunities to secure innovative power generation, such as combined heat and power (CHP). Equally, it will not deliver growth likely to significantly increase the demand for power from conventional sources and will also not be delivering

- development which in itself produces high emissions. Neutral effects are anticipated in relation to climate change mitigation.
- 5.12 In terms of adapting to climate change the preferred strategy performs well overall. Growth is distributed away from the areas of highest fluvial and surface water flood risk, though it is recognised that Site D1, allocated under the preferred strategy, is immediately adjacent to an area of Flood Zone 3. There is potential to deliver growth at the site which incorporates an open space buffer between the built area and the River Stour as necessary.
- 5.13 The plan includes a number of policies which could be effective at reducing emissions from transport, partly by reducing the need to travel overall and partly by seeking a modal shift to lower-emission transport modes. To this end, **Policy LM 16** (Sustainable Travel) could have positive effects as it seeks to reduce car use through improvements to public transport and by ensuring walking and cycling connecting with the range of services and facilities available at the centre of Long Melford.
- 5.14 **Policy LM 22** (Protection and Enhancement of Public Rights of Way) could have a minor positive effect in relation to climate change on the basis that enhancements to the green infrastructure and active travel network can play an important role in encouraging more journeys to be made on foot or by bicycle. However, it is acknowledged that it may be challenging to substantively minimise the need to travel by car for many longer journeys in the context of Long Melford, which is a rural settlement likely beyond reasonable walking or cycling distance of higher tier service centres for many residents, the presence of the three-mile cycle route to Sudbury along the alignment of the former railway line is acknowledged.
- 5.15 A requirement to deliver electric vehicle charging capabilities in new development under **Policy LM 18** (Charging Points in New Developments) could also have potential for minor positive effects through incentivising and enabling a modal shift away from high emission vehicles, though it is recognised that the most desirable form of modal shift is towards active travel (i.e. walking and cycling) rather than alternative models of private vehicle.
- 5.16 In terms of climate change adaptation, **Policy LM 12** (Addressing Flood Risk) requires development proposals at any site with a risk of surface water or fluvial flooding to demonstrate mitigation measures both in relation to the site itself and adjacent areas. The policy requires all sites of more than ten dwellings or greater than 0.5ha to incorporate Sustainable Urban Drainage Systems (SUDS). It is considered that in principle this is a suitable approach to take in the context of Long Melford's baseline flood risk. Positive effects are anticipated in relation to supporting the resilience of the Neighbourhood Plan area to the effects of flooding.
- 5.17 Well planned green infrastructure can help an area adapt to and manage the risks of climate change (including flood risk). Enabling and providing for green infrastructure within the Neighbourhood Plan area is therefore a key way in which the Neighbourhood Plan can help to promote climate change adaptation measures. **Policy LM 20** (Provision of New Green Spaces) could therefore have positive effects.
- 5.18 It is considered that the Neighbourhood Plan is likely to have a **minor positive effect in relation to the climate change SEA theme**.

Historic environment

- 5.19 The rich historic environment of Long Melford makes a significant contribution to the identity of the village and the parish. Consequently, the historic environment SEA objectives look to protect and enhance the rich variety of cultural and built heritage within Neighbourhood Plan area.
- 5.20 The quantum and distribution of growth proposed through a Neighbourhood Plan can be a key determinant of the nature of effects on a plan area's historic environment. It is important for new development not to detract from the vibrancy of historic character, though there can also potentially be opportunities for new development to enhance historic character as well. The Long Melford Neighbourhood Plan proposes distributing growth between small sites in the existing built area, including within the village's historic core, along with larger sites at the edge of the built area. In the context of Long Melford's built heritage sensitivities there is potential for effects from this proposed distribution of growth.
- 5.21 This potential is recognised by the site allocation policies for all of the sites proposed within or near to the village's conservation area and individual heritage assets. The three small sites (A1, G1 and L1) proposed in the village centre are proposed for allocation under **Policies LM 2, LM 3 and LM 4**. All three policies

are clear that development will be permitted only where there is “*no detrimental impact on the conservation area*”. It is considered that this form of words is sufficiently broad as to avoid being onerous or prescriptive but is still likely to be effective at ensuring poor quality or unsympathetic design does not come forward.

- 5.22 **Policy LM 6** allocates site K1 for up to 30 dwellings. The site is outside of the historic core of the village, though it is within the Long Melford conservation area and is adjacent to the Kentwell Hall Registered Park and Garden. There is additional heritage sensitivity from the Grade II-listed Thatched Cottage and its setting which is directly east of the site. The policy recognises the potential sensitivity of the site’s location, supporting development “*subject to the protection of Kentwell ground and views*” as well as stating that “*it is required that archaeological evaluation takes place*” as a condition of planning consent.
- 5.23 **Policy LM 7** allocates Site F1 and recognises an intrinsic heritage sensitivity at the site as a result of the adjacent Roman villa, a scheduled monument which “*needs to be considered in the design of the scheme*”. Whilst it is positive that the policy recognises the potential sensitivity associated with the scheduled monument, as with Policy LM 6 the policy then goes on to say that it is “*required that archaeological evaluation takes place*”.
- 5.24 **Policy LM 8** (Impact and Character of Developments) has a broader focus, setting a requirement that all developments greater than 10 units are responsive to the potential heritage sensitivities of their immediate and wider setting. The policy requires proposals to demonstrate that they respect Long Melford’s “*streetscape/townscape, heritage assets, important spaces, entry points to the village and historic views into and out of the village*”. The policy could directly result in positive effects in relation to heritage.
- 5.25 In light of the above it is considered that the Neighbourhood Plan is likely to have a **minor positive effect in relation to the historic environment SEA theme**.

Landscape

- 5.26 The quantum and distribution of growth through **Policy LM 1** (Growth and Sustainable Development) is anticipated to result in mixed effects in relation to landscape. The majority of growth is directed to sites with little inherent landscape sensitivity. The collection of sites within the core of the village, A1, G1 and L1, could all support development which responds positively to its built environment and has no effect on views into or out of the village. Similarly, neither Site D1 nor Site K1 make a significant contribution to the landscape setting of the village. Site D1 is well screened and development will be unlikely to alter the landscape context of the south of the village. Site K1 is also well screened from views over the wider landscape but does have a localised role in maintaining the landscape setting of the northern approach to the village. However, it is considered that this could be largely mitigated through appropriate design and layout of the final scheme. Site F1 at the south of the village has some sensitivity within the landscape and there could be potential for negative effects in relation to the landscape SEA objective from development at this site through the distribution of growth proposed under Policy LM 1. Although final effects will be significantly informed by the design, layout and screening of the scheme onsite, it is appropriate to identify the potential for negative effects on landscape from Policy LM 1.
- 5.27 However, **Policy LM 7** (Allocation of Site F1) identifies that the site currently makes an important contribution to the landscape character of the village, recognising that its openness supports views from the B1064 eastwards over agricultural land. Currently this openness contributes positively to the rural setting and character of the southern approach to the village and there is potential for this to be affected through development. In response to this the policy states that existing screening in the form of hedgerows and trees “*must be retained in order to form a green aspect to the development at an important entrance to the village*”.
- 5.28 **Policy LM 8** (Impact and Character of Developments) is multi-stranded and is not exclusively landscape focussed, though consideration of landscape effects is a key element. The policy says that development proposals must demonstrate that “*the scale and character of the proposal respects the landscape [and] landscape features*”. The policy also includes a broader requirement for development to “*make a positive contribution to the local character, shape and scale of the area*”. The intent is to limit schemes which, by virtue of scale and location, could have potential to erode or change the perception of the village within the landscape or harm its landscape setting. When the proposed allocation of Site F1 is seen in the context of the requirements of Policy LM 8 it is considered that potential landscape harm arising from the site’s sensitive location could potentially be mitigated by development which is consistent with LM 8. However,

the precise nature of effects will be determined by detailed matters of design and layout and are therefore uncertain at this stage.

- 5.29 **Policy LM 14** (Protection of Rural Gap) seeks to limit development in the existing gap between the built area of Long Melford and the built area of Sudbury, stating that “*development will not be supported other than in exceptional circumstances*”. The supporting text of the policy expands on the policy intent, saying that preserving the settlement gap will help maintain the distinctive settlement identity of Long Melford through the protection of its characterful rural setting.
- 5.30 **Policy LM 19** (Designation of Local Green Spaces) designates several of the village’s open space features for protection, ranging from Local Nature Reserves to local ‘green frontages’ to sports pitches. These features project openness into the built area of the village, contributing to the character and identity of Long Melford. Their continued protection is therefore likely to have positive effects in relation to landscape.
- 5.31 In light of the above it is considered that the Neighbourhood Plan is likely to have **uncertain effects in relation to the landscape SEA theme**.

Land, soil and water resources

- 5.32 **Policy LM 1** (Growth and Sustainable Development) seeks to make best use of available brownfield land, though there are not enough previously developed sites available to meet Long Melford’s housing need. In this context some greenfield, or mostly greenfield, sites are considered, although the distribution of growth through Policy LM 1 sees growth directed to sites which are not in productive agricultural use where possible. However, development at Site F1 would necessitate the loss of Grade 3 agricultural land, which has potential to be ‘best and most versatile’ land (though a detailed survey would be required to establish whether the land is Grade 3a or 3b). It is considered that the loss of productive agricultural land at Site F1 is inconsistent with the SEA objective to ensure “efficient and effective use of land”, particularly in light of the fact that Policy LM 1 delivers growth above the identified minimum level of housing need in Long Melford. On balance, minor negative effects from Policy LM 1 are therefore anticipated in relation to land, soil and water resource as a result.
- 5.33 **Policy LM 7** (Allocation of Site F1) states that a new defensible boundary to be created through the development process. The supporting text notes that development will effectively function as infill in a line of existing development, so establishing a clear new defensible boundary may help to reinforce the prevailing form of the village’s built area, avoiding future development which is not consistent with this form and thereby preventing additional land take in future.
- 5.34 A number of proposed site allocations are identified as containing either wastewater or potable water infrastructure assets and clearly there is a need to ensure any future development avoids obstructing access to such assets. Policies **LM 3**(Allocation of Site L1) and **LM 4** (Allocation of Site A1) both identify the presence of a sewer within the site boundaries, whilst Policies **LM 6** (Allocation of Site K1) and **LM 7** (Allocation of Site F1) identify that both a sewer and a water main lie within the site. All affected site allocation policies state that “*site layout should be designed to take this into account*”.
- 5.35 **Policy LM 14** (Protection of Rural Gap) has positive implications for achieving the most effective use of land as it seeks to limit development in the existing gap between Long Melford and Sudbury. This could help embed a ‘brownfield first’ approach to the delivery of future development, though it is recognised that brownfield opportunities within Long Melford are likely to continue to be limited.
- 5.36 In light of the above it is considered that on balance the Neighbourhood Plan is likely to have a **minor negative effect in relation to the land, soils and water resources SEA theme**.

Population and communities

- 5.37 The quantum and distribution of growth proposed through **Policy LM 1** (Growth and Sustainable Development) performs positively in relation to the SEA objective to provide a mix of types and tenures of housing. A key consideration is need to meet the housing needs of the plan area, and by allocating 77 dwellings the policy exceeds the housing target set by the Joint Local Plan (JLP), as there is no residual housing need left once completions and commitments in the plan area have been accounted for. By allocating growth at a number of smaller sites throughout the village the policy achieves a broad

distribution of growth and will deliver new homes at a range of locations. The proposed quantum of homes will help ensure a good mix of different dwelling types, helping to meet a range of housing needs within the community.

- 5.38 **Policy LM 9** (Affordable Housing) echoes the submitted Local Plan's requirement for 35% affordable housing delivery on all sites of at least 0.5ha or at least ten dwellings. **Policy LM 10** (Housing Reserved for Local People) adds further detail to the Neighbourhood Plan's approach to ensuring a provision of affordable housing to meet local need in Long Melford, stating that 50% of affordable housing provision "*shall be made available exclusively to local people*". The policy defines the terms necessary for eligibility.
- 5.39 **Policy LM 6** (Allocation of Sites for Development: K1, Land west of High Street) is anticipated to lead to significant positive effects in relation to population and communities as it will deliver at least 66% affordable housing, at least half of which will specifically made available to local residents, as defined in LM 10. There is reasonable certainty around achieving such high proportion of affordable housing on site as the policy text notes that this is a stipulation of the landowner (The Hamilton Trust). The supporting text of the policy states that the affordable tenures on site will be "*affordable rented homes in perpetuity*", making a positive contribution to the overall housing mix of Long Melford.
- 5.40 **Policy LM 7** (Allocation of Site F1) includes the notable requirement that 15% of the site area be reserved for use as new allotments to meet an identified local need. It is considered that this is positive in relation to catering for the identified needs of existing residents and anticipated need of future residents. Additionally, as Site F1 is located near the south of the village the policy will help deliver new allotments in an area of the village not currently served by nearby alternatives.
- 5.41 **Policy LM 21** (Provision of Outdoor Play Equipment) requires all new development proposals for 10 or more units or on sites of at least 0.5ha to provide "*appropriate outdoor play equipment, unless the development is to be occupied exclusively by people over the age of 55*". The policy will likely apply in relation to sites D1, K1 and F1 based on the proposed capacity at these sites. This is considered positive in principle as it will contribute new local areas of play for both new residents and existing residents, though there could be potential for viability concerns at Site K1 given that the site will be at least 66% affordable. However, this will be subject to detailed discussions at the planning application stage.
- 5.42 **Policy LM 19** (Designation of Local Green Spaces) designates several of the village's open space features for protection, ranging from Local Nature Reserves to local 'green frontages' to sports pitches. A key function of the policy is preserving the openness of these multifunctional features to secure their community benefit into the future, and is therefore likely to have positive effects in relation to population and communities.
- 5.43 In light of the above it is considered that the Neighbourhood Plan is likely to have a **significant positive effect in relation to the population and communities SEA theme**.

Health and wellbeing

- 5.44 **Policy LM 1** (Growth and Sustainable Development) has some potential to promote healthier modes of transport to meet local needs, though this is less apparent in relation to the proposed sites at the far north and far south of the village. Sites at the centre of the village will support walking and cycling for access to services, though the linear nature of the village means that growth directed to sites at either end of the built area are some distance from the village centre. Site K1 at the north of the settlement is around 1.5 kilometres from the village centre which may be beyond reasonable walking or cycling distance for some residents. However, it is possible to travel the full distance on paths which are segregated from the road which is positive. Similarly, Site D1 in the south offers potential for car-free access to the village centre via Ropers Lane.. **Policy LM 5** (Allocation of Site D1)
- 5.45 **Policy LM 16** (Sustainable Travel) could have positive effects in relation to health and wellbeing as it seeks to reduce car use through improvements to public transport and by ensuring walking and cycling connectivity with the range of services and facilities available at the centre of Long Melford. For sites which are peripheral to the village core it will be particularly important that opportunities to enhance walking and cycling connectivity are maximised as walking and cycling may not be natural first choice transport options for many residents.
- 5.46 **Policy LM 19** (Designation of Local Green Spaces) identifies several kinds of open space features for protection. Although by their nature these spaces are multifunctional, a common thread running through

them all is their capacity to support health and wellbeing, either through their primary function (e.g. sports pitches) or their secondary function (e.g. Local Nature Reserves, which can support wellbeing through promoting access to nature). The primary focus of the policy is preserving the openness of these multifunctional features to secure their community benefit.

- 5.47 Similarly, **Policy LM 20** (Provision of New Green Spaces) could also have positive effects by virtue of seeking the delivery of multifunctional green space in new development and ensuring that residents have easy access to outdoor recreational space. This will be of direct benefit to the relevant developments, though could also be of benefit to established development nearby which will likely be able to access the new areas of green space which may be closer than existing facilities.
- 5.48 **Policy LM 22** (Protection and Enhancement of Public Rights of Way) seeks to “*expand and improve links with the wider network*” which could theoretically have the effect of improving the quality and variety of opportunities to walk for leisure in the local area, though effects are likely to be minor overall.
- 5.49 In light of the above it is considered that the Neighbourhood Plan is likely to have a **minor positive effect in relation to the health and wellbeing SEA theme**.

Transport

- 5.50 The distribution of growth proposed through **Policy LM 1** (Growth and Sustainable Development) could have some potential to promote sustainable travel and reduce the need to travel to meet local needs, though this potential is not distributed evenly. Sites at the centre of the village will clearly support sustainable access to services, though the linear nature of the village means that growth directed to sites at either end of the built area are some distance from the village centre. Site K1 at the north of the settlement is around 1.5 kilometres from the village centre which may be beyond reasonable walking or cycling distance for some residents. However, it is possible to travel the full distance on paths which are segregated from the road which is a significant positive. Car free access to the village is also available from Site D1 from the south. Both sites D1 and K1 are close to bus stops which will enable quick access to the village centre, as well as to Sudbury and Bury St Edmunds nearby. It is considered that although a range of local needs could potentially be met within the village it is likely that private car will remain the choice of many residents, particularly as all sites are well located to access the local and strategic road network.
- 5.51 **Policy LM 16** (Sustainable Travel) has most direct potential for effects on the transport SEA theme, requiring all development to “*encourage sustainable travel, reduce car use and, where possible, improve accessibility of public transport*”. The policy’s recognition of the importance of driving down car dependence is positive, although the requirement to “*ensure that their site is linked to village facilities by safe and adequately lit footways*” may have to be delivered through Section 106 contributions where such footways do not already exist. In this context, it is noted that wording of **Policy LM 5** (Allocation of Site D1) is silent on pedestrian access to the site, though the supporting text notes that “*the site also has frontage to Ropers Lane, allowing safe access for pedestrians*”. Given that Ropers Lane would provide the only pedestrian access to the village centre the policy could therefore be strengthened if the policy wording were amended to include a more explicit requirement for pedestrian access to Ropers Lane to be retained through the development process.
- 5.52 **Policy LM 18** (Charging Points in New Developments) may have a minor positive effect in terms of promoting sustainable transport on the basis that it will support electric and low emission vehicle use through the provision of electric vehicle charging points in new development. This is consistent with Suffolk County Council’s existing parking guidance, though by incorporating guidance into policy the Neighbourhood Plan takes a more robust position.
- 5.53 **Policy LM 22** (Protection and Enhancement of Public Rights of Way) could potentially support sustainable travel as enhancement of the public rights of way network and aspiration to “*expand and improve*” the local network, such as connectivity with the Valley Trail to Sudbury, may facilitate more local journeys being undertaken on foot. However, in practice it is likely that most journeys via the Public Rights of Way network are for leisure rather than for access to services and the effect in relation to the transport SEA objectives is likely to be neutral.
- 5.54 In light of the above it is considered that the Neighbourhood Plan is likely to have an overall **neutral effect in relation to the transport SEA theme**.

Conclusions at this stage

- 5.55 The appraisal finds that the plan as a whole is likely to lead to significant positive effects in relation to the population and communities SEA theme, whilst minor positive effects are anticipated in relation to the biodiversity, climate change and historic environment themes. Neutral effects are anticipated in relation to the transport theme, whilst minor negative effects are anticipated in relation to the land, soil and water resources theme. Uncertain effects are anticipated in relation to the landscape themes.
- 5.56 Significant positive effects are predicted in relation to population and communities because the plan proposes to exceed minimum housing need, including the delivery of a significant quantum of affordable housing. Housing growth will be well dispersed throughout the village, whilst new community infrastructure will be delivered also, enhancing the social and economic vitality of the plan area.
- 5.57 Minor positive effects are predicted in relation to biodiversity given the potential for habitat enhancement at all proposed site allocations, as well as the avoidance of harm to designated sites. Similarly, minor positive effects are predicted in relation to the historic environment on the basis that the plan's policies are considered to adequately mitigate potential risks to the historic environment at sensitive site allocations, whilst also offering potential to enhance a number of sites within their historic context. Minor positive effects in relation to climate change are predicted on the basis that the plan's distribution of growth avoids areas of significant flood risk and its detailed policies include further flood risk mitigation, as well as providing for adaptation to, and mitigation of, other effects of climate change through proposed green infrastructure protection and enhancement. Finally, minor positive effects are anticipated under health and wellbeing, on the basis that the plan brings forward development which supports walking and cycling access to a range of local services, whilst also protecting and enhancing recreational opportunities in the village.
- 5.58 Neutral effects are predicted in relation to transport on the basis that, on balance, the plan's policies and allocations are unlikely to support behaviour change which notably either positively or negatively changes the baseline position of the plan area in respect of either theme.
- 5.59 Negative effects are predicted in relation to land, soils and water resources on the basis that the plan proposes development which will necessitate the avoidable loss of productive agricultural land at Site F1 without mitigation. The site has potential to be underlain by 'best and most versatile' agricultural land, though a detailed survey would be required to establish its precise grade.
- 5.60 When read as a whole, the Neighbourhood Plan is anticipated to result in **broadly positive effects in relation to the SEA framework**.

6. Next steps

- 6.1 The Long Melford Neighbourhood Plan and this Environmental Report will be submitted to Babergh District Council for subsequent Independent Examination.
- 6.2 At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the existing Local Plan.
- 6.3 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 Long Melford Parish.

Appendix A – SEA scoping report consultation responses

A summary of representations to the statutory SEA scoping report consultation, along with how they have been considered is presented in Table A1 below. The consultation was open between Monday 17th June, and Monday 22nd July 2019.

Table A1 Summary of representations to the SEA scoping report consultation

Consultee	Consultation response summary	How the response is considered and addressed
Historic England	<ul style="list-style-type: none"> No specific comments provided. 	n/a
Natural England	<ul style="list-style-type: none"> Glemsford Pits SSSI falls partly within the Long Melford Neighbourhood Plan area. The SEA should be mindful of potential effects on this SSSI when appraising the policies and allocations of the Plan. 	The scope of the SEA will include the Glemsford Pits SSSI and the appraisal will take it into account along with all other SSSIs identified through the scoping process.
Environment Agency	<ul style="list-style-type: none"> n/a - no representation received. 	n/a

Appendix B – Summary of key issues

Drawing on the review of the sustainability context and baseline, the scoping report process identified a range of sustainability issues that should be focus of SEA. These issues are presented below under eight environmental themes.

Biodiversity

- Kentwell Woods Site of Special Scientific Interest (SSSI) and Lineage Wood & Railway Track, Long Melford SSSI are located within the Neighbourhood Plan area.
- There are numerous Biodiversity Action Plan priority habitats present in the Neighbourhood Plan area.
- Development could offer opportunities to seek biodiversity net gain, mindful that localised net gain is most beneficial when it also contributes to net gain at a strategic scale.

Climate change

- Transport emissions are the biggest contributor to greenhouse gas (GhG) emissions in Babergh District, potentially reflecting the rural nature of much of the District and associated car dependency.
- There are areas at risk of flooding (fluvial and surface water flooding) within the Neighbourhood Plan area, principally around main river and stream corridors.
- The Long Melford Neighbourhood Plan should seek to increase the Plan area's resilience to the effects of climate change by supporting and encouraging adaptation strategies such as SuDS.

Historic environment

- Long Melford is exceptionally rich in historic assets including both a significant quantity of individual heritage assets and a prevailing and coherent overall historic character.
- The variety of heritage assets includes four Grade I, twelve Grade II* and 191 Grade II listed buildings, as well as three RPGs and three scheduled monuments.
- Long Melford Conservation Area covers the historic core of the village as well as the Melford Hall RPG and Kentwell Hall RPG at the north of the village.
- There are 149 records on Historic England's Heritage Environment Register within Long Melford Parish including a variety of archaeological sites, historic buildings and landscapes dating from the palaeolithic period to the present day.
- Development has the potential to affect the significance of heritage assets and their settings, both positively and negatively.

Landscape

- The Neighbourhood Plan area is set within an attractive arable landscape, though the landscape is not subject to any protective designations at a national scale.
- The historic townscape character and the village's wider landscape setting are strongly linked, and new development could have potential to affect both.
- The former Stour Valley Railway provides a clearly defined western boundary to Long Melford and breaching it would likely alter the character and setting of the village.

Land, soil and water resources

- A significant proportion of the Neighbourhood Plan area is underlain by land classified as the best and most versatile (BMV) agricultural land.

- Around two thirds of the Neighbourhood Plan area is within ground water Source Protection Zone (SPZ) 3 (i.e. the lowest sensitivity), with most of the remaining are within SPZ2 and a small area at the far south within SPZ1 (i.e. the greatest sensitivity).
- The entire Neighbourhood Plan area is designated as a Nitrate Vulnerable Zone for both ground water and surface water, though this is within the context of similar designation for much of eastern England.

Population and communities

- The population of the Neighbourhood Plan area grew slowly between 2001 and 2011 at just 2.5%.
- Over 36% of the population was age 60 or over at the 2011 census, notably higher than in Babergh District or the East of England region, and significantly higher than the national average.
- Academic attainment is relatively low in the context of regional and national attainment, though there is a notably high proportion of both skilled tradesmen and senior managerial level professionals in the village.

Health and wellbeing

- The village has its own healthcare facility at the Long Melford Practice. Data on the ratio of patients per GP suggests there could be capacity within the practice for new patients.
- Although a majority of residents within the Neighbourhood Plan Area consider themselves to have good or very good health, the proportion of residents reporting very good health is low in relation to regional and national averages.
- Similarly, a higher proportion of residents in Long Melford report that their activities are limited to some degree than the proportion reported at regional and national scales, potentially reflecting the high proportion of older residents in the village.

Transport

- Car ownership and car dependency is relatively high, reflecting Long Melford's rural location and the need to access higher tier settlements for some services and facilities.
- There is reasonable provision of bus services to Sudbury and Bury St Edmunds though the nearest railway station is around 4.5 kilometres away in Sudbury.
- The village is well connected to the regional road network but is around 50 kilometres from the nearest motorway junction at J10 of the M11.

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