

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

Environmental Report

Stutton Parish Council

July 2022

## Quality information

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# Non-technical Summary

## Introduction

AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Stutton Neighbourhood Plan.

The Stutton Neighbourhood Plan is currently being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012, and in the context of the adopted Babergh Local Plan (2006) and the emerging Babergh and Mid Suffolk Joint Local Plan.

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

This SEA Environmental Report, including this NTS, accompanies the submission Stutton Neighbourhood Plan in formal (Regulation 16) consultation.

## Structure of the Environmental Report / this NTS

SEA reporting essentially involves answering the following three questions in turn :

1. What has plan-making / SEA involved up to this point?
  - Including in relation to 'reasonable alternatives'.
2. What are the SEA findings at this stage?
  - I.e. in relation to the draft plan.
3. What happens next?

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

## What is the Plan seeking to achieve?

The following vision has been established for the Neighbourhood Plan:

- Stutton should remain a vibrant, cohesive community supporting high levels of wellbeing for its residents.
- As the village grows and society changes, the character of the village should be maintained, whilst permitting small-scale sustainable growth in line with the needs and wishes of the community.
- The beautiful countryside and landscapes will be retained and enhanced and continue to be a source of great pleasure for the community.
- Together, we will ensure that the infrastructure of the village supports all residents at different stages of their lives.

## What is the scope of the SEA?

The scope of the SEA is reflected in a list of themes, objectives, and assessment questions, which, taken together indicate the parameters of the SEA and provide a methodological ‘framework’ for assessment. A summary framework is presented here, and a full framework which includes assessment questions is provided within **Appendix B** of the main Environmental Report.

SEA theme	SEA objective
Air quality	Improve air quality in the Stutton Neighbourhood Area.
Biodiversity	Protect and enhance biodiversity and geodiversity sites and features, by avoiding impacts on regionally and locally designated sites, and delivering demonstrable biodiversity net gains.
Climate change	Reduce the contribution to climate change made by activities within the Neighbourhood Plan Area.
	Support the resilience of the Neighbourhood Plan Area to the potential effects of climate change, including flooding.
Landscape	To protect and enhance the character and quality of the immediate and surrounding landscape.
Historic environment	To protect, conserve and enhance the historic environment within and surrounding the Stutton Neighbourhood Plan area.
Land, soil, and water resources	To ensure the efficient and effective use of land
	To protect and enhance water quality and use and manage water resources in a sustainable manner.
Community wellbeing	Ensure growth in the Parish is aligned with the needs of all residents and capacity of the settlement and social infrastructure, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.
Transportation	Promote sustainable transport use and reduce the need to travel.

## Plan-making / SEA up to this point

Part 1 of the report discuss the evolution of the Neighbourhood Plan in association with the SEA process. Specifically, Part 1:

1. Presents the process of exploring reasonable alternatives; and
2. Sets out the preferred approach for the Neighbourhood Plan.

## Establishing the reasonable alternatives

Part 1 of the report focuses on alternative options for the overall distribution and location of housing growth within the Stutton Neighbourhood Plan.

In light of there not being a requirement to allocate sites through the neighbourhood plan, or meet a residual housing number, no reasonable alternatives have been assessed through the SEA process relating to the scale or distribution of development.

In addition, given the conformity of the neighbourhood plan with the provisions of national and local planning policy (including associated with the JLP), it is not appropriate for further issues to be explored through the SEA process as reasonable alternatives.

## Developing the preferred approach

The Neighbourhood Plan does not seek to allocate sites for housing development. Instead, the Parish Council have developed policies and proposals to address local place-based issues, reflecting local evidence and community consultation responses.

It is the intention for the Neighbourhood Plan to be used to plan positively for local development, shaping and directing development in the area that is outside the strategic elements of the emerging Local Plan.

## Assessment findings at this stage

Part 2 of the Environmental Report presents an assessment of the Neighbourhood Plan. Assessment findings are presented as a series of narratives under the SEA themes established through scoping. The following overall conclusions are reached:

Overall, given the absence of allocations for development, the Stutton Neighbourhood Plan is only likely to lead to significant effects in relation to the community wellbeing SEA theme. Significant positive effects reflect the spatial strategy directions and specific requirements set to reflect local housing needs (type and tenure). Additionally, the designation of a settlement boundary and of local green spaces will support the living environment and support healthy communities.

Focussing development within the settlement boundary also supports the landscape, and land, soil and water SEA themes, with minor positive effects predicted. The conservation and enhancement of the historic environment and wider landscape (including the AONB) is also predicted to lead to minor positive effects.

Some uncertainty does however exist in relation to the impact of rural exception sites on the environment, including in relation to the biodiversity theme, with effects to be determined once the exact location of development is confirmed.

Additionally, minor positive effects are predicted for the climate change and transportation SEA themes as a result of the support for low carbon, sustainable development, and making use of the opportunities available relating to these themes where possible. Specifically, the Neighbourhood Plan supports the facilitation of modal shift and provides a degree of self-containment (supporting existing and expanding businesses), in addition to addressing any localised impacts of growth.

Residual neutral effects are concluded in relation to the remainder of the SEA themes, reflecting the Plan's avoidance and mitigation measures which should ensure that any new development in the parish integrates without causing significant deviations from the baseline situation.

## Next steps

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

## Plan finalisation

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

If the examination leads to a favourable outcome, the Neighbourhood Plan will then 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'. Once 'made', the Stutton Neighbourhood Plan will become part of the Development Plan for Babergh, covering the defined neighbourhood area.

## Monitoring

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

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

# 1. Introduction

## Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Stutton Neighbourhood Plan.
- 1.2 The Stutton Neighbourhood Plan is currently being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012, and in the context of the adopted Babergh Local Plan (2006) and the emerging Babergh and Mid Suffolk Joint Local Plan.
- 1.3 This Environmental Report accompanies the submission (Regulation 16) version of the Neighbourhood Plan. A six week Regulation 14 consultation ran from 8 November to 20 December 2021.
- 1.4 SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the Stutton Neighbourhood Plan is a legal requirement.

## SEA explained

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

## This Environmental Report

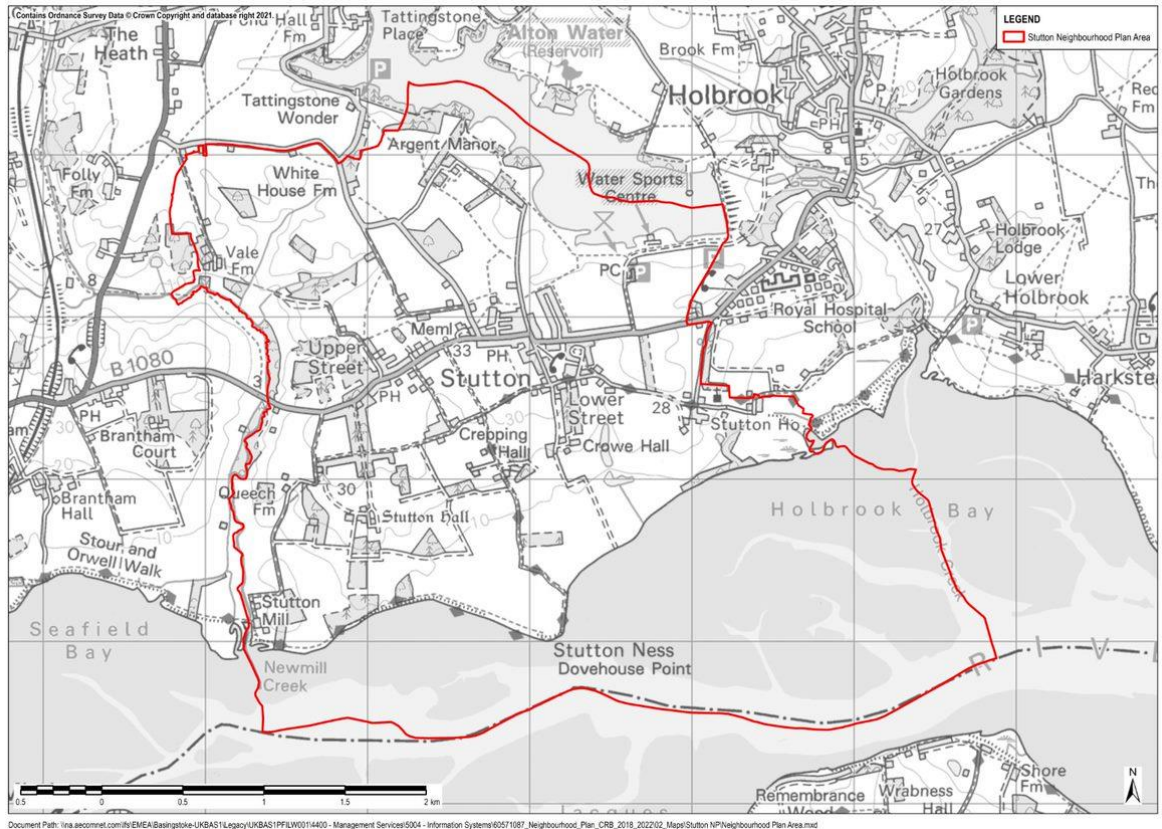
- 1.8 As highlighted above, this Environmental Report is published alongside the 'submission' version of the Stutton Neighbourhood Plan, under Regulation 16 of the Neighbourhood Planning Regulations (2012, as amended).
- 1.9 This report essentially answers questions 1, 2 and 3 in turn, to provide the required information. Each question is answered within a discrete 'part' of the report.



1.10 However, before answering Q1, two initial questions are answered to further set the scene: what is the plan seeking to achieve?

1.11 This section considers the strategic planning policy context provided by the adopted Babergh Development Plan and the emerging Babergh and Mid Suffolk Joint Local Plan.

1.12 **Figure 2.1** below presents the neighbourhood area.



**Figure 2.1 Stutton Neighbourhood area**

## Strategic planning policy context

1.13 The Parish falls within the boundary of Babergh District. The adopted Babergh Development Plan comprises the following key 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)

1.14 Babergh District council are currently working with Mid Suffolk District Council to develop a Joint Local Plan (JLP). The JLP is at a relatively progressed stage of development, having been submitted for Examination in March 2021.

Following the Matter 4 hearing sessions (September 2021), the Councils have proposed to undertake further work regarding the Joint Local Plan's spatial distribution and the housing site selection process.

- 1.15 It has therefore been proposed to progress the current Joint Local Plan (JLP) as a 'Part 1' local plan, which will be followed by the preparation and adoption of a 'Part 2' local plan as soon as possible.
- 1.16 The Local Development Scheme is currently being updated to reflect this, and this will provide details of what each plan will cover, and the timetable for their production.
- 1.17 The Stutton Neighbourhood Plan must be in general conformity with the strategic policies of the local development framework for Babergh, in line with footnote 18 of the National Planning Policy Framework (NPPF).<sup>1</sup> Additionally, NPPF Para 48 states that “*local planning authorities may give weight to relevant policies in emerging plans*” according to set criteria which includes its stage of preparation. For the purposes of the SEA, focus is placed on the emerging Babergh and Mid Suffolk JLP, recognising that some updates are likely to be made to the plan as a result of examination.
- 1.18 Subject to the outcome of the examination, the submitted JLP categorises Stutton as a ‘Hinterland Village’ with a settlement boundary established under Policy SP03. Policy SP04 identifies the broad distribution of new housing, with directions for Neighbourhood Plans and a minimum housing requirement for Neighbourhood Plan areas (identified through Table 4). This identifies a total need for Stutton of 65 new dwellings in the period up to 2037, with outstanding planning permissions existing for 11 of these 65 dwellings as of 1st April 2018. To meet the residual need for 54 new homes Policy LS01 allocates three sites for 34, 14 and 6 dwellings. All sites are already either completed, under construction or have planned start dates.
- 1.19 With these allocations, there is no identified residual need for further development in the Parish.

## Stutton Neighbourhood Plan vision and objectives

- 1.20 The Stutton Neighbourhood Plan vision is that:
- Stutton should remain a vibrant, cohesive community supporting high levels of wellbeing for its residents.
  - As the village grows and society changes, the character of the village should be maintained, whilst permitting small-scale sustainable growth in line with the needs and wishes of the community.
  - The beautiful countryside and landscapes will be retained and enhanced and continue to be a source of great pleasure for the community.
  - Together, we will ensure that the infrastructure of the village supports all residents at different stages of their lives.
- 1.21 In support of achieving this vision, the Plan has 18 objectives, under seven themes, as set out overleaf.

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<sup>1</sup> MHCLG (2021) [National Planning Policy Framework](#)

## **Spatial Strategy**

- To control development that is commensurate with Stutton designation as a hinterland village and protect the valued rural landscape that abuts the settlement boundary

## **Housing**

- To provide affordable housing (both to rent and to buy) - suitable for single people, young families, and older people wishing to downsize.
- To maintain and enhance Stutton's rural identity, ensuring new development reflects local character and avoids or mitigates environmental impact.
- To provide appropriate housing of good design, suitable for people's changing needs over their lifetimes, which respects the rural character and village settlement boundaries, which is served by adequate infrastructure, and which incorporates measures that reduce environmental impact.

## **Landscape and Natural Environment**

- To preserve the character of Stutton and ensure the landscape and natural environment is enhanced.
- To protect, improve the connection of and promote the creation of green spaces in and around the village.
- To integrate appropriate biodiversity features and minimise light pollution in new developments

## **Leisure and tourism**

- To support leisure and tourism activities which respect the character of the area.
- To support leisure and tourism activities which do not adversely impact on residential or other uses.

## **Heritage and culture**

- To conserve heritage assets for the enjoyment of the public, visually or otherwise
- To encourage the sense of cultural community within the village through clubs and groups for activities such as gardening, sports, and the arts
- To promote the existing spirit of artistic and creative activity, and of service to the community.

## **Getting around**

- To reduce and mitigate the adverse effect of traffic on pedestrians, those with mobility issues, cyclists and equestrians through the village.
- To ensure Stutton offers a safe environment for people and vehicles to move around.
- To ensure that new development does not exacerbate but aims to mitigate current problems with traffic, parking and road safety.

## **Community facilities and business**

- To sustain and grow a vibrant community life in the village across a range of interests, ages and needs.
- To sustain and enhance existing facilities, organisations, and activities.
- To make the village a good place to start and run a small business or work from home, in keeping with the agricultural and rural surroundings.

## 2. SEA for the Stutton Neighbourhood Plan

### Introduction

- 2.1 The aim here is to explain the process of screening the Neighbourhood Plan for SEA, and subsequently introduce the reader to the scope of the SEA. This comprises the sustainability themes and objectives that should be a focus of the assessment of the Plan and reasonable alternatives. **Appendix II** presents further information.

### HRA screening, including Appropriate Assessment

- 2.2 The Regulation 14 Pre-Submission Stutton Neighbourhood Plan was screened for Habitats Regulations Assessment (HRA) in January 2022 by Place Services on behalf of Babergh District Council.
- 2.3 The HRA Screening stage identified that, without mitigation, further consideration was required at the Appropriate Assessment (AA) stage to determine whether the Regulation 14 Pre-Submission Stutton Neighbourhood Plan either alone or in-combination with other plans and projects, would adversely affect the integrity of Habitats sites as a result of the recreational disturbance potential impact pathway. I.e. the HRA recommended that Policies SN11, SN14 and SN22 should be assessed further due to predicted recreational impacts or changes in water quality.
- 2.4 In applying the HRA Test 2 –the integrity test at AA stage -, based on the proximity to Habitats sites, and in order to be in accordance with the Suffolk Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS), mitigation needs to be embedded in the Plan in relation to recreational disturbance and changes in water quality from waste-water to avoid impacts from the Neighbourhood Plan alone. Therefore, the HRA recommended that the policy and supporting text is altered for Policies SN11, SN14 and SN22.
- 2.5 Subject to the above recommendations being incorporated, and Natural England’s review, this HRA Screening Report including AA concludes that the Regulation 14 Pre-Submission Stutton Neighbourhood Plan is not predicted, with the mitigation secured, to result in any Adverse Effect on the Integrity of the Habitats sites in scope, either alone or in combination with other plans and projects.

### SEA screening

- 2.6 The Stutton Neighbourhood Plan was subsequently screened (May 2022) by Land Use Consultants (LUC) on behalf of Babergh District Council for SEA.
- 2.7 The Screening Report prepared by LUC concludes that:

*“although, the Neighbourhood Plan does not directly impact on land use through the allocation of sites for housing or other forms of development, the separate Habitats Regulations Assessment (HRA) Screening Report (January 2022) prepared on behalf of Babergh District Council by Place Services*

*concluded that an Appropriate Assessment is required as Policies SN11 [Mitigating the impact of development on the Stour & Orwell SPA], SN14 [Visitor and Tourism Development] and SN22 [New and Expanding Businesses] may result in a likely significant effect on one or more European sites. On that basis, it is considered that the Stutton Neighbourhood Plan is likely to have significant environmental effects and that full SEA is therefore required.”*

- 2.8 Consultation on the Screening Report was carried out with the Environment Agency, Historic England, and Natural England.
- 2.9 The response from Natural England states that *“in so far as [their] our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, [they felt] that there are unlikely to be significant environmental effects from the proposed plan, but also reminded us of our responsibilities in regard to this matter.”*
- 2.10 The response from Historic England also suggests that “a full SEA is not required from the perspective of the historic environment”. No response was forthcoming from the Environment Agency.
- 2.11 In light of the SEA Screening Report prepared by LUC and notwithstanding the consultation responses received, it was decided by Babergh District Council that *“a precautionary approach should be taken and, consequently, it is determined that the Stutton Neighbourhood Plan does require a Strategic Environmental Assessment in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004.”*

## Scoping consultation

- 2.12 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”. As set out above, in England, the consultation bodies are the Environment Agency, Historic England, and Natural England.<sup>2</sup> As such these authorities were consulted in April - May 2022, and the responses received are detailed in **Appendix II**.

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<sup>2</sup> These consultation bodies were selected “by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes” (SEA Directive, Article 6(3)).

## The SEA framework

2.13 **Table 3.1** below presents a list of themes and objectives and assessment questions that together form the basis of the SEA scope, and comprises a 'framework' under which to complete assessment.

**Table 3.1 The SEA framework**

SEA theme	SEA objective
Air quality	Improve air quality in the Stutton Neighbourhood Area.
Biodiversity	Protect and enhance biodiversity and geodiversity sites and features, by avoiding impacts on regionally and locally designated sites, and delivering demonstrable biodiversity net gains.
Climate change	Reduce the contribution to climate change made by activities within the Neighbourhood Plan Area.
	Support the resilience of the Neighbourhood Plan Area to the potential effects of climate change, including flooding.
Landscape	To protect and enhance the character and quality of the immediate and surrounding landscape.
Historic environment	To protect, conserve and enhance the historic environment within and surrounding the Stutton Neighbourhood Plan area.
Land, soil, and water resources	To ensure the efficient and effective use of land
	To protect and enhance water quality and use and manage water resources in a sustainable manner.
Community wellbeing	Ensure growth in the Parish is aligned with the needs of all residents and capacity of the settlement and social infrastructure, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.
Transportation	Promote sustainable transport use and reduce the need to travel.

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



## 3. Introduction (to Part 1)

- 3.1 The 'narrative' of plan-making/ SEA up to this point is told within this part of the Environmental Report.
- 3.2 In accordance with the SEA Regulations the Environmental Report must include:
- An outline of the reasons for selecting the alternatives dealt with; and
  - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.

### Overview of plan-making / SEA work to date

- 3.3 Plan-making for the Stutton Neighbourhood Plan has been underway since 2018. Initial work incorporated a number of informal and formal consultation exercises carried out by the Neighbourhood Plan Steering Group (NPSG), including on the scope of the Neighbourhood Plan.
- 3.4 A significant number of consultation events have since been carried out for the Neighbourhood Plan. These have predominately been delivered through the 'Big Conversation', the NPSG's consultation strategy carried out over many months; and has included a range of public meetings, local residents surveys, as well as workshops.
- 3.5 The following sections discuss the evolution of the Neighbourhood Plan in association with the SEA process.
- Chapter 4 - presents the process of exploring reasonable alternatives.
  - Chapter 5 - sets out the preferred approach for the Neighbourhood Plan.

## 4. Exploring reasonable alternatives

### Introduction

- 4.1 A key element of the SEA process is the appraisal of ‘reasonable alternatives’ for the Neighbourhood Plan. The SEA Regulations are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the ‘plan and reasonable alternatives taking into account the objectives and geographical scope of the plan’.
- 4.2 In many respects, the Stutton Neighbourhood Plan Steering Group are limited in terms of potential alternatives that can be considered for the Neighbourhood Plan, which must be in general conformity with and support the strategic development needs set out in the adopted Babergh Development Plan, and the emerging JLP.
- 4.3 For many Neighbourhood Plans, significant effects against SEA objectives have the most potential to arise as a result of the scale, location and distribution of development. In this context, the overall level, distribution and location of housing growth would be a logical focus for assessing alternative options for the Stutton Neighbourhood Plan.

### How many homes?

- 4.4 As set out above in Chapter 2, subject to the outcome of the examination, Policy SP04 of the submitted JLP identifies a total need for Stutton of 65 new dwellings in the period up to 2037, with outstanding planning permissions existing for 11 of these 65 dwellings as of 1st April 2018. To meet the residual need for 54 new homes Policy LS01 allocates three sites for 34, 14 and 6 dwellings. All sites are already either completed, under construction or have planned start dates.
- 4.5 Extant planning permissions have also met housing need of 15-20 affordable homes identified for Stutton in the Community Action Suffolk Stutton Housing Survey Report (September 2019).
- 4.6 With these allocations, there is no identified residual need for further development in the Parish.

### Location for growth?

- 4.7 In the light of the housing target being an indicative requirement, the Parish Council commissioned AECOM (2022) to carry out an assessment to determine if any sites in the parish were potentially suitable for housing development.
- 4.8 The site assessment considered six potential development sites. Of these six, three sites (SNP1, SNP3 and SNP4) were found potentially suitable for allocation subject to specific local need for housing being demonstrated, the sites being identified as available, and landscape issues being addressed in line with Local Plan policy. Sites SNP2, , SNP5 and SNP6 were found not suitable for allocation due to access, heritage, and landscape issues.
- 4.9 The three potentially suitable sites were further considered by the NPSG.

- 4.10 Policy SP04 in the JLP specifies that Neighbourhood Plans would only be justified in exceeding the minimum allocations “should the unique characteristics and planning context of the designated area enable so”. This is particularly significant in this locality. Stutton is a hinterland village with most of it lying within the Suffolk Coast and Heaths AONB. This is recognised in the Joint Babergh and Mid Suffolk District Council Landscape Guidance (August 2015). The Guidance highlights the need “to maintain and enhance the landscape and the settlement pattern, ensuring the sense of separation between settlements is maintained”. Policy SN9 requires that any development must be sensitive to the distinctive landscape and settlement character.
- 4.11 The village is currently experiencing significant growth by virtue of planning permissions granted (which, as set out in section 4.4, make up the JLP indicative housing allocation). Together they will increase the size of the village by 16% and will meet the housing need identified in the recent Housing Needs Survey<sup>3</sup>.
- 4.12 Furthermore, all sites as ‘potentially suitable’ (AECOM 2022) lie wholly or partially outside of the settlement boundary and are currently defined as being in open countryside. and the sites therefore do not conform with strategic policies of the emerging JLP as set out above.
- 4.13 In light of there not being a requirement to allocate sites through the Neighbourhood Plan or meet a residual housing number, no reasonable alternatives have been assessed through the SEA process relating to the scale or distribution of development. In addition, given the conformity of the neighbourhood plan with the provisions of national and local planning policy (including associated with the JLP), it is not appropriate for further issues to be explored through the SEA process as reasonable alternatives.

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<sup>3</sup> Community Action Suffolk (2019) Stutton Housing Needs Assessment

## 5. Preferred approach for the Stutton Neighbourhood Plan

5.1 As set out above, the Neighbourhood Plan does not seek to allocate sites for housing development. Instead, the Parish Council have developed policies and proposals to address local place-based issues, reflecting local evidence and community consultation responses. The Neighbourhood Plan will be used to plan positively for local development, shaping and directing development in the area that is outside the strategic elements of the emerging Local Plan.

### Early assessment of the Neighbourhood Plan

5.2 In April 2022 AECOM carried out a high level assessment of the Regulation 14 version of the Neighbourhood Plan. AECOM provided the following **five recommendations**:

1. Policy SN7 Renewable Energy and Energy Efficiency in developments - it is considered that the policy and supporting text could also explain how such infrastructure will/may be funded, e.g. developer contributions.
2. Policy SN9 Stutton Landscape and Settlement Character - To strengthen the policy the second bullet could be merged with the first paragraph to state for example, 'all development proposals shall be sensitive to the distinctive landscape, settlement character, and features in Stutton, as described in the Parish Landscape Study.' Alternatively, the policy could simply require proposals to demonstrate how they have taken into consideration the Landscape Study, with particular focus placed on the visual sensitivity and landscape value factors identified through the Study. This would strengthen the policy through highlighting the key considerations for proposals.
3. Policy SN10 Enhancing the Natural Environment - Bullets set out appear to consider a range of biodiversity features in isolation. Policy SN10 could be strengthened by requiring development proposals to plan positively for the protection, enhancement and creation of networks to improve the connectivity between biodiversity assets and green infrastructure. Specific reference to Network Enhancement Zone 1, present to the south of the Plan area, would be a useful addition to the policy text, providing protection to valuable primary habitat present (lowland fens and raised bog).

Given that there is now a mandatory requirement for 10% biodiversity net gain<sup>4</sup>, Policy SN10 could seek to support net gains in biodiversity that exceed 10%, and specify how this might be delivered; i.e. through the creation of new habitats and the enhancement of existing sites.

4. Policy SN18 Pedestrian and cycle access within the village - As within Policy SN17, Policy SN18 could be strengthened by adding a requirement 'that new development demonstrate how they have taken every opportunity to link and enhance existing network and provide new pedestrian and cycle route networks where possible.' Adding a requirement to demonstrate

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<sup>4</sup> The [Environment Act 2021](#) ensures developments deliver at least 10% increase in biodiversity

how/where opportunities have been explored will strengthen the policy and its intent / implementation.

5. Policy SN22 New and expanding businesses - In terms of environmental constraints/considerations it is considered that landscape is omitted here. It is recommended that a bullet is added to require new businesses to consider landscape sensitivity/setting in line with the Landscape Study, and design principles set out in the Stutton Design Guide.
- 5.3 The Parish Council subsequently updated the draft Neighbourhood Plan ready for submission, in response to the recommendations proposed above.

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

- 5.4 To support the implementation of the vision for the Stutton Neighbourhood Plan discussed in **Section 2.10**, the Neighbourhood Plan puts forward 23 policies to guide development in the parish.
- 5.5 The policies, which were developed following extensive community consultation and evidence gathering, are set out in **Table 7.1** below.

**Table 7.1 Stutton Neighbourhood Plan policy list**

**Policy no. Policy title**

SN1	Spatial Strategy
SN2	Housing Mix
SN3	Affordable housing
SN4	Affordable housing on rural exception sites
SN5	Lifetime homes
SN6	Achieving good design in Stutton
SN7	Renewable energy and energy efficiency in developments
SN8	Sustainable drainage
SN9	Stutton Landscape and Settlement Character
SN10	Enhancing the natural environment
SN11	Mitigating the impact of development on the Stour & Orwell estuaries Special Protection Area
SN12	Local Green Space
SN13	Conserving and enhancing the Suffolk Coast and Heaths Area of Outstanding Natural Beauty
SN14	Visitor and Tourism Development

SN15	Preserving and enhancing heritage assets and the character of the village
SN16	Non-designated heritage assets
SN17	Reducing the impact of increased road traffic generated by development
SN18	Pedestrian and cycle access within the village
SN19	Non-motorised rights of way
SN20	Protecting community facilities
SN21	New community facilities
SN22	New and expanding businesses
SN23	Existing Business Premises

5.6 **Sections 6.5-6.15** discuss the content of the current version of the Neighbourhood Plan in more detail.

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

## 6. Introduction (to Part 2)

6.1 The aim of this chapter is to present assessment findings and recommendations in relation to the current 'Submission' version of the Stutton Neighbourhood Plan. This chapter presents:

- An assessment of the Neighbourhood Plan under the eight SEA theme headings; and
- The overall conclusions at this current stage.

### Appraisal method

6.2 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.1**) as a methodological framework.

6.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.

6.4 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Neighbourhood Plan to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects. These effect 'characteristics' are described within the assessment as appropriate.



# 7. Assessment of the Stutton Neighbourhood Plan

## Plan contents, aims and objectives

- 7.1 Stutton is a small village in a rural setting, focused along the B1080 linear route which extends throughout the settlement. The B1080 links the village to Holbrook and Ipswich in one direction and Brantham and Manningtree in the other.
- 7.2 Stutton has a rich natural environment that is recognised through a suite of designations from international to local level. The Stour Estuary which bounds the south of the village, is part of the Stour and Orwell estuaries Special Protection Area (SPA), a Ramsar site and a Site of Special Scientific Interest (SSSI). There are four County Wildlife Sites within the parish, including Alton Water which is the largest in Suffolk.
- 7.3 The countryside around the village is that of a typical East Anglian arable landscape, with just a small amount of seasonal grazing by cattle and sheep. The fields are surrounded by established hedgerows of varying quality, small woodlands, shelter belts and individual trees. Two of the woodlands are County Wildlife Sites.
- 7.4 Both from within and on the outskirts of Stutton, distant views of the wider, open landscape, including those across to Essex can be experienced. The land to the south of Holbrook Road/Manningtree Road (the B1080) lies within the Suffolk Coast and Heaths AONB, which extends to the west of the village down to the Samford Valley.
- 7.5 The public footpath network extends throughout the village and links to well established walking trails, notably the Stour and Orwell Walk and forthcoming National Trail England Coast Path, which hold important views.
- 7.6 Rich in heritage, Stutton has 30 Grade II or II\* listed buildings and monuments throughout the village. These are predominantly focused around Lower Street and Manningtree Road.
- 7.7 Despite being a linear village running more than a mile east to west, there is a strong sense of community. The village's school and adjoining nursery Stutton Young Explorers, church, two public houses, the community shop, the community hall and sheltered housing with care are just some of the elements that underpin and sustain community life. These important local businesses also help to bring visitors to the area.
- 7.8 The Neighbourhood Plan seeks to identify the community's aspirations for Stutton over the period to 2037. While it is recognised that Stutton's housing need has already been met through the JLP, the Neighbourhood Plan seeks to provide a guide for future development in the parish, creating 'a balance between protecting what is here and welcoming the new.'
- 7.9 Housing policies within the Neighbourhood Plan seek to influence the range of housing types, tenures, and sizes being delivered in the parish, including on rural exception sites.

- 7.10 Natural environment policies are proposed, which notably support net gains in biodiversity, at a minimum of 10%. This is directed towards the important green and blue spaces in the village, improving connectivity and supporting the valuable wildlife resource (designated and non-designated assets). Protection is also provided for key views (as identified on the policies map) and landscape features (trees, hedges, etc.) which support in the neighbourhood area, and the wider Suffolk Coast and Heaths AONB. The policy framework seeks to protect dark skies, with development proposals expected to be compatible with the management objectives set out in the most up to date Management Plan for the AONB.
- 7.11 The policy framework places an emphasis on high-quality design and provides the supporting Stutton Design Guide. This includes design that minimises impacts in relation to sensitive heritage settings.

## Appraisal of the Stutton Neighbourhood Plan

### Biodiversity

- 7.12 There are no designated biodiversity sites within the Neighbourhood Plan area, however the parish borders the Stour and Orwell Estuaries Ramsar site, SPA and SSSI, falling within the site's established 'zone of influence' (Zol). The designated site is particularly sensitive to increased visitor pressure, which may be caused by new residential development within the zone of influence.
- 7.13 A Suffolk-wide Recreational disturbance Avoidance and Mitigation Strategy (RAMS) has been prepared and supported by Babergh & Mid Suffolk Councils, which seeks to address impacts arising for these designated sites along the Suffolk coast. The RAMS identifies the types of mitigation that will be required in development in the Zol. In Stutton, this equates to a financial contribution from any new development which results in a net increase in homes. While the Stutton Neighbourhood Plan does not allocate sites for housing development, Policy SN11 (Mitigating the impact of development on the Stour & Orwell estuaries Special Protection Area) seeks to ensure that where residential development does come forward within the Zol, this financial contribution will be required. This is to avoid adverse in-combination recreational disturbance effects on the integrity of the Ramsar, SPA and SSSI.
- 7.14 More locally, Policy SN10 (Enhancing the natural environment) requires that "any new development proposal must meet the requirement to plan positively for the protection, enhancement and creation of networks to improve the connectivity between biodiversity assets and green infrastructure." Particularly this includes "appropriately contribute to the creation of biodiversity features" and providing a "10% net gain" in biodiversity in support of nature recovery (in line with the Environment Act 2021).
- 7.15 Whilst the focus for development is within the settlement boundary, Policy SN4 (Affordable Housing on Rural Exception Sites) makes provision for the development of affordable housing on rural exception sites. New development could encroach onto existing rural sites with the potential for minor negative effects on local biodiversity features and the parish's ecological resource. However effects are uncertain at this stage, dependant on the exact location of development.

- 7.16 Policy SN12 (Local Green Space) is also noteworthy in this respect, designating five LGSs of local importance, including because their “richness of wildlife”.
- 7.17 Overall, **broadly neutral effects** are considered achievable in relation to biodiversity. The parish is not particularly constrained, and where development does come forward it will be required to align with local and national policy, providing protection and enhancements to the local and wider biodiversity resource. Some uncertainty does however exist in relation to rural exception sites, with effects to be determined once the exact location of development is confirmed.

## Climate change

- 7.18 In terms of climate change adaptation, flood risk is an issue for the Neighbourhood Plan area, with areas of high and medium fluvial and surface water flood risk existing, notably adjacent to the Alton Water and River Stour. There is evidence of local issues regarding the drainage of this surface water which has been expressed by a number of residents living in the area. There is a need to be mindful therefore of future flood risk.
- 7.19 When considering the policy protections provided by SN8 (Sustainable Drainage), particularly the requirement for proposals to “submit schemes, appropriate to the scale of the proposal, detailing how on-site drainage will be managed so as not to cause or exacerbate surface water and fluvial flooding elsewhere”, broadly neutral effects are anticipated. The policy seeks to ensure no significant deviations from the baseline in the long term, while recognising that the baseline is constantly moving. In this respect schemes are further required to include “an allowance for climate change” in accordance with most up to date Environment Agency advice.
- 7.20 Policy SN7 (Renewable Energy and Energy Efficiency in Developments) is the main policy providing development guidance relating to climate change mitigation, supporting local and national carbon neutral targets.<sup>5</sup> Notably the policy seeks high levels of energy efficiency (targeting zero carbon emissions), sustainable design and construction, energy storage facilities, and renewables. Also of note in this respect is Policy SN6 (Achieving Good Design in Stutton) which is underpin by the Stutton Design Guide. The Guide provides further specific guidance on designing flexible homes, insulating buildings, delivering low carbon development and designing roof solar panels as an integral part of a development.
- 7.21 The wider Neighbourhood Plan policy framework further seeks to ensure that any new development in the parish integrates and connects well with existing services and facilities, and sustainable transport options. Additional policy provisions also require that development delivers 10% biodiversity net gain in line with national policy, and where applicable guides the development of new open spaces.
- 7.22 Overall, given the Stutton Neighbourhood Plan does not seek to allocate sites for development, any increase in the built footprint of the neighbourhood area and absolute emissions are not considered a consequence of the

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<sup>5</sup> Both the NPPF (paras 154-155) and the JLP (LP25) support planning policies which contribute to radical reductions in greenhouse gas emissions.

Neighbourhood Plan. Rather the Plan seeks to influence per capita emissions through encouraging high quality and efficient new development that is well connected to the settlement's offer. Furthermore, the Neighbourhood Plan sets requirements to address local flood risk, and supports accessible, green, sustainable growth within the village. On this basis, **minor positive effects** are concluded.

## Landscape

- 7.23 As discussed previously, the quality and character of the local landscape, the topography, and valued viewpoints are key constraints for growth in Stutton. Of greatest significance, the southern half of the parish is designated in the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB). Valued views exist through the AONB landscape (i.e. at Crepping Hall Drive) and across tranquil Alton Water.
- 7.24 While the Neighbourhood Plan does not seek to allocate specific sites for housing, Policy SN1 (Spatial Strategy) requires that new development in the parish is focused within the defined settlement boundary. The Plan adopts the settlement boundary which appears within the JLP with one small amendment (to include six new homes that recently built on a rural exception site on Holbrook Road). Focusing growth in the settlement boundary is anticipated to lead to positive effects for landscape, safeguarding the rural countryside outside of the settlement.
- 7.25 Whilst the focus for development is within the settlement boundary, Policy SN4 (Affordable Housing on Rural Exception Sites) makes provision for the development of affordable housing on rural exception sites. New development could encroach onto existing rural sites with the potential for minor negative effects on the landscape. However requirements set out within Policy SN4 seek to minimise effects in this respect, ensuring that exception sites are well related to the settlement boundary and confirm to design principles as set out in the design guide.
- 7.26 Policy SN9 (Stutton Landscape and Settlement Character) seeks to ensure that where new development does come forward, "proposals shall be sensitive to the distinctive landscape, settlement character and features in Stutton, as described in the Parish Landscape Study." Furthermore, "particular care should be taken with development proposals impacting on the sensitive settlement edges as shown on Policy Map SN9B." The settlement pattern is further protected through the requirement to "Maintain the general open character of the landscape gap between the main village and Stutton Green" and "protect the character of the rural gap between Upper Street and the main village."
- 7.27 It is recognised that poorly designed development in the setting of an AONB can have a significant impact on the nationally designated landscape, and therefore for any schemes proposed in the AONB, Policy SN13 (Conserving and enhancing the Suffolk Coast and Heaths Area of Outstanding Natural Beauty) applies. Policy SN13 requires development to comply with the management objectives set out in the most up to date Management Plan for the AONB, and provide "a proportionate landscape assessment that provides full justification for the proposal in landscape and visual sensitivity terms." Given the policies reinforce the provisions of the AONB Management Plan, the application of the neighbourhood plan policies have the potential to conserve,

and in some cases, enhance the parish's contribution to the special qualities of the AONB.

- 7.28 The wider policy framework places much emphasis on high-quality design in development, notably through Policy SN6 (Achieving good design in Stutton) with reference to the supporting Stutton Design Guide. Detailed guidance is provided in relation to the built form, the street scene, and green infrastructure, including car parking solutions and street lighting.
- 7.29 Overall, the Neighbourhood Plan policy framework sets out detailed landscape requirements for development proposals, ensuring good mitigation to reduce the impacts of new development in the parish. Furthermore, proposals will be required to be within the defined settlement boundary, and retain and enhance key landscape features which contribute to the character and intrinsic qualities of the AONB. **Minor positive effects** are therefore predicted overall.

### Historic environment

- 7.30 The Stutton Neighbourhood area is rich in history and is host to four Grade II\* and 26 Grade II listed buildings, including the Church of St Peter. Policy SN15 (Preserving and enhancing heritage assets and the character of the village) and Policy SN16 (Non-designated heritage assets) are dedicated to the historic environment, identifying that any development impacts to either designated or non-designated heritage assets will not be supported. Furthermore, any proposal which impacts on a designated heritage asset must be accompanied by a Heritage Statement.
- 7.31 Whilst the focus for development is within the settlement boundary (Policy SN1), Policy SN4 (Affordable Housing on Rural Exception Sites) makes provision for the development of affordable housing on rural exception sites. New development could impact upon the setting of heritage assets with the potential for minor negative effects, however requirements set out within Policy SN4 seek to minimise effects in this respect. For example, in line with Policy SN4 exception sites must be well related to the settlement boundary and confirm to design principles as set out in the design guide.
- 7.32 Direct links are made through supporting policy text to the Stutton Design Guide, which draws on guidance issued by Historic England<sup>6</sup>, and identifies key features that contribute to historic character. The Neighbourhood Plan also maps and lists locally identified and valued non-designated heritage assets, and sets out the reasons for inclusion within the Plan and Design Guide. The protection of valued heritage assets and their setting within the rural landscape has the potential for minor positive effects.
- 7.33 Conservation and enhancement of the historic environment is further provided through the wider policy framework, notably Policy SN14 (Visitor and Tourism Development) and SN22 (New and Expanding Businesses) which set out additional provisions relating to the fabric and setting of heritage assets.
- 7.34 Overall, the proposed policy framework seeks to ensure proposals for development in the parish minimise adverse impacts in relation to the historic

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<sup>6</sup> Historic England (2017) The Setting of Heritage Assets. Historic Environment Good Practice Advice in Planning. Note 3

environment, and supports the enhancement of assets where possible. **Minor positive effects** are predicted.

### Land, soil and water resources

- 7.35 While the Neighbourhood Plan does not allocate sites for housing development, the spatial strategy does focus development within the settlement boundary, which will reduce the potential for development on high quality agricultural land in the wider parish. Focussing development within the settlement boundary will direct growth to the village's urban core, likely including on brownfield land, with the potential for minor positive effects.
- 7.36 The Neighbourhood Plan is not deemed likely to affect water quality, particularly given focussing growth in the settlement boundary would avoid development near waterbodies (River Stour located to the south of the plan area), and the promoted application of sustainable drainage systems (Policy SN8).
- 7.37 Overall, the Neighbourhood Plan performs well in relation to this theme, with **minor positive effects** predicted.



## Community wellbeing

- 7.38 As set out in Chapter 6 above, Stutton is currently experiencing significant growth by virtue of planning permissions granted which make up the JLP indicative housing allocation. Most of these developments are either built or currently under construction. Together they will increase the size of the village by 16% and will meet the housing need identified in the recent Housing Needs Survey. Therefore the Steering Group have concluded that additional allocations cannot be justified at this time.
- 7.39 The Neighbourhood Plan does however propose measures which will help to protect settlement identity and community cohesion in the long-term. Policies seek to guide new development in the parish, adopting the settlement boundary (Policy SP1), and setting requirements for housing mix and affordable housing to meet local needs (Policy SN2, SN3 and SN5). Policy SN4 (Affordable Housing on Rural Exception Sites) is also of relevance, supporting future development designed to meet evidenced housing need on rural exception sites where established criteria is met.
- 7.40 Significant emphasis is also placed on housing design through the policy framework and supporting Stutton Design Guide. High sustainability standards are sought in connected homes, which integrate with the existing settlement and provide for a high standard of living.
- 7.41 The health of Stutton residents is generally good, with deprivation levels generally low. The Neighbourhood Plan seeks to support sustainable communities; prioritising active travel and modal shift where possible, and protecting existing and expanding local businesses. Leisure and tourism activities are also supported where they do not adversely impact on residential or other uses, recognising the significant draw of Alton Waters.
- 7.42 Existing and future residents will be supported by local services, facilities, and open/ green space, with a presumption in favour of the protection of existing community facilities (as listed within Policy SN20). Continued positive health outcomes are therefore considered likely in the longer term.
- 7.43 In conclusion, considering the points set out above, **significant positive effects** are considered a likely outcome in relation to this theme.

## Transportation

- 7.44 The B1080 is the main linear route through Stutton, linking it to Holbrook and Ipswich in one direction and Brantham and Manningtree in the other. Two other significant roads are Bentley Lane and Church Road. In recent years there has been an increase in traffic which is of concern to residents. Given the rural nature of the parish and relative lack of sustainable transport options, in the absence of strategic transport interventions, growth in the parish will likely further rely on the private vehicle for travel.
- 7.45 A lack of parking in the village has also been highlighted as a key concern for existing residents, and therefore developments are required to follow the most recent Suffolk Guidance for Parking.
- 7.46 Reducing the impact of increased road traffic generated by development is a key objective of the Neighbourhood Plan, with Policy SN17 – SN19 identifying

interventions to sustainably accommodate growth throughout the plan period. For example, development proposals must “demonstrate contribution to the achievement of transport mode shift in the Transport Mitigation Strategy for the Ipswich Strategic Planning Area” and “financial contributions will be sought”.

- 7.47 Stutton is moderately well served by public footpaths, however these are often unsuitable for elderly residents and small children/ push chairs. Policy SN18 (Pedestrian and cycle access within the village) and SN19 (Non-motorised rights of way) therefore provide protection to the Public Rights of Way (PRoW) network. These policies support new links/ local improvements to the active travel network where possible; recognising that accessibility and ease of movement are essential. Effects in this respect extend not only to the economic and social wellbeing of the village, but also to the integration of its community.
- 7.48 Overall, the Neighbourhood Plan supports opportunities for modal shift and provides a degree of self-containment (supporting existing and expanding businesses). The settlement is relatively well connected in terms of access to local services/ facilities, although limited in sustainable transport offer and holds parking concerns. Nonetheless, policy directions seek to address any localised impacts of growth and therefore **minor positive effects** are concluded in the long term.

## Conclusions

- 7.49 Overall, given the absence of allocations for development, the Stutton Neighbourhood Plan is only likely to lead to significant effects in relation to the community wellbeing SEA theme. Significant positive effects reflect the spatial strategy directions and specific requirements set to reflect local housing needs (type and tenure). Additionally, the designation of a settlement boundary and of local green spaces will support the living environment and support healthy communities.
- 7.50 Focussing development within the settlement boundary also supports the landscape, and land, soil and water SEA themes, with minor positive effects predicted. The conservation and enhancement of the historic environment and wider landscape (including the AONB) is also predicted to lead to minor positive effects.
- 7.51 Some uncertainty does however exist in relation to the impact of rural exception sites on the environment, including in relation to the biodiversity theme, with effects to be determined once the exact location of development is confirmed.
- 7.52 Additionally, minor positive effects are predicted for the climate change and transportation SEA themes as a result of the support for low carbon, sustainable development, and making use of the opportunities available relating to these themes where possible. Specifically, the Neighbourhood Plan supports the facilitation of modal shift and provides a degree of self-containment (supporting existing and expanding businesses), in addition to addressing any localised impacts of growth.
- 7.53 Residual neutral effects are concluded in relation to the remainder of the SEA themes, reflecting the Plan’s avoidance and mitigation measures which should ensure that any new development in the parish integrates without causing significant deviations from the baseline situation.



# Appendix I: Meeting the Regulations

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

**Table AI.1: Questions answered by this report, in-line with an interpretation of regulatory requirements**

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

**Table AI.2: Interpretation of the regulations**

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

**Table AI.3: ‘Checklist’ of how (throughout the SEA process) and where (within this report) regulatory requirements are met**

Regulatory requirement	Discussion of how requirement is met
<b>A) The Environmental Report must present certain information</b>	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	<b>Chapter 2</b> (‘What is the plan seeking to achieve’) presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters have been considered in detail through scoping work, which has involved dedicated consultation on a Scoping Report. The ‘SEA framework’ – the outcome of scoping – is presented within <b>Chapter 3</b> (‘What is the scope of the SEA?’). More detailed messages, established through a context and baseline review are also presented in Appendix II of this report.
3. The environmental characteristics of areas likely to be significantly affected;	
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The SEA framework is presented within <b>Chapter 3</b> (‘What is the scope of the SEA’). Also, Appendix II presents key messages from the context review.  With regards to explaining <i>“how...considerations have been taken into account”</i> , Chapter 7 explains the Parish Council’s ‘reasons for supporting the preferred approach’, i.e. explains how/ why the preferred approach is justified.

Regulatory requirement	Discussion of how requirement is met
<p>6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);</p>	<p><b>Chapter 8</b> presents an assessment of the Neighbourhood Plan. With regards to assessment methodology, <b>Chapter 8</b> explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g. timescale.</p>
<p>7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;</p>	<p>The assessment highlights certain tensions between competing objectives, which might potentially be actioned when finalising the plan. Also, <b>Chapter 7</b> explains how recommendations were made through a high level assessment of an earlier version of the Neighbourhood Plan that has now been actioned.</p>
<p>8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;</p>	<p><b>Chapters 4 and 5</b> deal with ‘Reasons for selecting the alternatives dealt with’, in that there is an explanation of the reasons for focusing on particular issues and options. Also, <b>Chapter 7</b> explains the Parish Council’s reasons for selecting the preferred option.</p>
<p>9. Description of measures envisaged concerning monitoring in accordance with Art. 10;</p>	<p><b>Chapter 11</b> presents measures envisaged concerning monitoring.</p>
<p>10. A non-technical summary of the information provided under the above headings</p>	<p>The NTS is provided at the beginning of this report.</p>
<p><b>B) The Report must be published for consultation alongside the draft plan</b></p>	

Regulatory requirement	Discussion of how requirement is met
<p>Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)</p>	<p>At the current time, this Environmental Report is published for consultation alongside the Neighbourhood Plan in order to inform the consultation.</p>
<p><b>C) The report must be taken into account, alongside consultation responses, when finalising the plan</b></p>	
<p>The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.</p>	<p>Assessment findings presented within this Environmental Report, and consultation responses received, have been fed back to the Steering Group and have informed plan finalisation.</p>

# Appendix II: The scope of the SEA

## Introduction

This appendix presents additional information on the SEA scope, namely key issues under each of the SEA framework headings. As set out in the Scoping Report, these key issues were identified following a review of the context and baseline.

Additionally, this appendix presents a summary of responses received as part of the scoping consultation.

## Biodiversity

There are no designated sites within the Neighbourhood Plan area, however the parish borders the Stour and Orwell Estuaries Ramsar site, SPA and SSSI. Since the Stutton Neighbourhood Area falls within the ZOI for the site, any new residential development will be required to mitigate the effects of the development and show how this will be achieved prior to approval of planning permission.<sup>7</sup>

The Neighbourhood Plan area includes areas of Ancient Woodland, and a number of local designated sites and BAP priority habitats. These BAP habitats are likely support populations of protected species.

Key context documents include -

- EU Biodiversity Strategy (May 2011)
- National Planning Policy Framework (NPPF) (2021)
- The Natural Environment White Paper (NEWP) (2012)
- The 25 Year Environment Plan (2018)
- Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)
- A Green Infrastructure Framework for Babergh District (2012)
- Suffolk Coast Recreational Disturbance Avoidance Mitigation Strategy (RAMS) (2019)
- Babergh Local Plan Core Strategy (2014)
- Draft Babergh and Mid Suffolk Joint Local Plan (JLP) (2020)

In light of this discussion, and supplementary discussion within the Scoping Report (2022), the following objective was established, along with a series of supplementary assessment questions (see overleaf).

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<sup>7</sup> Footprint Ecology (2019) Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils – Technical Report [online] available at: <https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf>

<p>Protect and enhance all biodiversity and geological features</p>	<ul style="list-style-type: none"> <li>• Protect and enhance internationally, nationally, and locally designated sites, including supporting habitats and mobile species that are important to the integrity of these sites?</li> <li>• Protect and enhance semi-natural habitats as well as priority habitats and species, including ancient woodland?</li> <li>• Achieve biodiversity and environmental net gains and support the delivery of ecosystem services and multifunctional green infrastructure networks?</li> <li>• Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?</li> <li>• Support access to, interpretation and understanding of biodiversity and geodiversity?</li> </ul>
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## Climate change

As highlighted by the figures above, the Stutton Neighbourhood is partially affected by areas of high and medium fluvial and surface water flood risk, notably adjacent to the Alton Water and River Stour. There is evidence of local issues regarding the drainage of this surface water which has been expressed by a number of residents living in the area. There is an opportunity for the Neighbourhood Plan to support delivery of effective and high quality Sustainable Drainage Systems (SuDS).

CO<sub>2</sub> emissions for Babergh have steadily declined over the period of 2005- 2018, in line with regional and national statistics, but at a slightly slower rate. The transport sector is the largest contributor to emissions in the District, and continues to be a key challenge locally, reflecting the rural nature of the parish.

Key context documents include -

- UK Climate Change Risk Assessment Report (2017)
- Climate Change Act (2008)
- National Planning Policy Framework (NPPF) (2021)
- Flood and Water Management Act (2010)
- Babergh Local Plan Core Strategy (2014)
- Draft Babergh and Mid Suffolk Joint Local Plan (JLP) (2020)

In light of this discussion, and supplementary discussion within the Scoping Report (2018), the following objectives were established, along with a series of supplementary assessment questions (see overleaf).



<p>Reduce the level of contribution to climate change made by activities within the Neighbourhood Plan area</p>	<ul style="list-style-type: none"> <li>• Reduce the number of journeys made by polluting vehicles?</li> <li>• Promote the use of sustainable modes of transport including walking, cycling and public transport?</li> <li>• Increase the number of new developments meeting or exceeding sustainable design criteria?</li> <li>• Generate energy from low or zero carbon sources?</li> <li>• Reduce energy consumption from non-renewable resources?</li> </ul>
<p>Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding</p>	<ul style="list-style-type: none"> <li>• Avoid development in areas at risk of flooding, considering the likely future effects of climate change?</li> <li>• Ensure that inappropriate development does not take place in areas at higher risk of flooding, considering the likely future effects of climate change?</li> <li>• Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change?</li> <li>• Sustainably manage water runoff, reducing surface water runoff (either within the plan area or downstream)?</li> <li>• Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Area?</li> <li>• Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?</li> </ul>

## Landscape

The southern half of the parish is designated in the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB). Important viewpoints have been identified in Stutton, valued locally by residents and reflecting the special qualities of the Neighbourhood Plan area and wider AONB. In particular views from across Alton Water are of interest to many visitors as well as local residents and is highly valued for its tranquil amenity.

The Stutton Neighbourhood Area is described by the Suffolk Coast and Heaths NCA. The Suffolk County Landscape Character Assessment (SCLCA) also divides the Neighbourhood Area into four distinct LCTs: 'Plateau Estate Farmlands, Ancient Estate Farmlands, Rolling Valley Farmlands, and Rolling Estate Farmlands.

Key context documents include -

- National Planning Policy Framework (NPPF) (2021)
- The 25 Year Environment Plan (2018)
- The National Design Guide (2019)
- National Model Design Code (2021)
- Suffolk Landscape Character Assessment (2011)
- Joint Babergh and Mid Suffolk Landscape Character Guidance (2015)



- Regulation 19 ‘Pre-Submission’ draft Babergh and Mid Suffolk Joint Local Plan (JLP)

In light of this discussion, and supplementary discussion within the Scoping Report (2022), the following objective was established, along with a series of supplementary assessment questions.

<p>To protect and enhance the character and quality of the immediate and surrounding landscape.</p>	<ul style="list-style-type: none"> <li>• Conserve and enhance the Suffolk Coast &amp; Heaths AONB in line with the objectives of the AONB management plan 2018?</li> <li>• Protect and/ or enhance local landscape character and quality of place?</li> <li>• Conserve and enhance local identity, diversity and settlement character?</li> <li>• Identify and protect locally important viewpoints which contribute to character and sense of place?</li> <li>• Protect visual amenity and locally important views in the Stutton Neighbourhood Area?</li> <li>• Retain and enhance landscape features that contribute to the water setting, or rural setting, including trees and hedgerows?</li> </ul>
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## Historic environment

The Stutton Neighbourhood area is rich in history and is host to four Grade II\* and 26 Grade II listed buildings and monuments, including the Church of St Peter.

The parish is also rich in non-designated assets, for example around Manningtree Road whereby undated cropmarks of a fragmentary field system with archaeological potential are identified.

Key context documents include -

- National Planning Policy Framework (NPPF) (2021)
- The 25 Year Environment Plan (2018)
- Historic England Advice Note 11: Neighbourhood Planning and the Historic Environment (2019)
- Joint Babergh and Mid Suffolk Landscape Character Guidance (2015)
- Regulation 19 ‘Pre-Submission’ draft Babergh and Mid Suffolk Joint Local Plan (JLP)

In light of this discussion, and supplementary discussion within the Scoping Report (2022), the following objective was established, along with a series of supplementary assessment questions (see overleaf):

<p>To protect, conserve and enhance the historic environment within and surrounding the Stutton Neighbourhood Area.</p>	<ul style="list-style-type: none"> <li>• Conserve and enhance buildings and structures of architectural or historic interest, both designated and non-designated, and their settings?</li> <li>• Protect the integrity of the historic setting of key monuments of cultural heritage interest as listed in the Suffolk HER?</li> <li>• Support the undertaking of early archaeological investigations and, where appropriate, recommend mitigation strategies?</li> <li>• Support access to, interpretation and understanding of the historic evolution and character of the Neighbourhood Area?</li> </ul>
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## Land, soil and water resources

A proportion of the Stutton Neighbourhood Area is underlain by land classified as best and most versatile (BMV) agricultural land, including areas of Grade 1. Future development should seek to avoid loss of this resource wherever possible.

The Stutton Neighbourhood area overlaps with an NVZ however it is unlikely that the NP will have an impact on the designation. The Stutton Neighbourhood area is also nearby a site for the extraction of sand and gravel in the west of the Plan Area at Tattingstone.

The WRMP states that even with the proposed demand management strategy, the Essex Suffolk WRZ will be in a water resource deficit by 2044-2055.<sup>8</sup> However the WRMP has outlined measures required to address predicted shortfalls and investment priorities over the Plan period.

Key context documents include -

- National Planning Policy Framework (NPPF) (2021)
- The 25 Year Environment Plan (2018)
- Anglian Water's Water Resource Management Plan (WRMP) (2019)
- Suffolk Minerals and Waste Local Plan (SMWLP)
- Babergh and Mid Suffolk Water Cycle Study (2020)
- Joint Babergh and Mid Suffolk Landscape Character Guidance (2015)
- Regulation 19 'Pre-Submission' draft Babergh and Mid Suffolk Joint Local Plan (JLP)

In light of this discussion, and supplementary discussion within the Scoping Report (2022), the following objective was established, along with a series of supplementary assessment questions (see overleaf).

<sup>8</sup> Anglian Water (2019) Water Resource Management Plan 2019 [online] available at: <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf>

<p>Ensure the efficient and effective use of land.</p>	<ul style="list-style-type: none"> <li>• Avoid the unnecessary sterilisation of, or hindering of access to mineral resources in the Plan area?</li> <li>• Avoid the loss of high-quality agricultural land resources?</li> <li>• Avoid the unnecessary sterilisation of, or hindering of access to mineral resources in the Stutton Neighbourhood Area?</li> <li>• Promote the use of previously developed land, vacant &amp; derelict brownfield land opportunities?</li> </ul>
<p>Protect and enhance water quality and use and manage water resources in a sustainable manner.</p>	<ul style="list-style-type: none"> <li>• Support improvements to water quality?</li> <li>• Ensure the timely provision of wastewater infrastructure?</li> <li>• Ensure appropriate drainage and mitigation is delivered alongside development?</li> <li>• Protect groundwater and surface water resources from pollution?</li> <li>• Maximise water efficiency and opportunities for water harvesting and/ or water recycling?</li> </ul>

## Community wellbeing

A large proportion of the population within Neighbourhood Area are over 65 age band. This suggests there is an ageing population within the parish and a subsequent need to plan for more adaptable homes, specialist homes, etc. Furthermore, an ageing population can place extra and different demands on local health, education, transport and potentially housing such as Oak House.

With a lower proportion of younger people, it is likely that this imbalance, if it were to increase, could threaten the future sustainability of the community. The number of local children may challenge the viability of the village's primary school.

There is a range of community facilities in the Stutton Neighbourhood area including (for example, around Alton Water). Access to green space is also very good which can help reduce barriers to accessing services and improve the living environment.

Key context documents include -

- National Planning Policy Framework (NPPF) (2021)
- The 25 Year Environment Plan (2018)
- Babergh and Mid Suffolk District Councils Joint Homelessness Reduction and Rough Sleeping Strategy (2019)
- Babergh and Mid Suffolk District Councils Homes and Housing Strategy (2019)
- Babergh and Mid Suffolk District Councils Leisure, Sport and Physical Activity Strategy - Update (2021)
- Joint Babergh and Mid Suffolk Landscape Character Guidance (2015)
- Regulation 19 'Pre-Submission' draft Babergh and Mid Suffolk Joint Local Plan (JLP) (2020)

In light of this discussion, and supplementary discussion within the Scoping Report (2022), the following objective was established, along with a series of supplementary assessment questions.

<p>Ensure growth in the Parish is aligned with the needs of all residents and capacity of the settlement and social infrastructure, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.</p>	<ul style="list-style-type: none"> <li>• Provide everyone with the opportunity to live in good quality, and affordable housing?</li> <li>• Support the provision of a range of house types and sizes?</li> <li>• Meet the needs of all sectors of the community?</li> <li>• Provide flexible and adaptable homes that meet people's needs, particularly the needs of an ageing population?</li> <li>• Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people?</li> <li>• Encourage and promote social cohesion and active involvement of local people in community activities?</li> <li>• Promote the use of sustainable building techniques, including use of sustainable building materials in construction?</li> <li>• Minimise fuel poverty?</li> <li>• Maintain or enhance the quality of life of existing local residents?</li> </ul>
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## Transportation

Trends show cars/ vans as the primary mode of transport within the parish, and there are several traffic hotspots within Stutton, recognised locally for causing safety issues for pedestrians.

While there are daily bus services to Ipswich and Manningtree (Monday - Friday), weekend bus services are much more limited. Travel by rail is also limited given Manningtree Station located 4.6 miles away. Manningtree Station provides access to strategic centres including London.

There are numerous footpaths and bridleways present in the Neighbourhood Plan area, providing connectivity throughout the parish. Opportunities to improve and/ or extend active travel connections, alongside public realm improvements and urban greening within the plan are should be sought.

Key context documents include -

- National Planning Policy Framework (NPPF) (2021)
- Decarbonising Transport: Setting the Challenge (2020)
- Suffolk Local Transport Plan (2011- 2031) (2011)
- Joint Babergh and Mid Suffolk Landscape Character Guidance (2015)
- Regulation 19 'Pre-Submission' draft Babergh and Mid Suffolk Joint Local Plan (JLP)

In light of this discussion, and supplementary discussion within the Scoping Report (2022), the following objective was established, along with a series of supplementary assessment questions.

<p>Promote sustainable transport use and reduce the need to travel.</p>	<ul style="list-style-type: none"><li>• Support the key objectives within the Suffolk Local Transport Plan to encourage more sustainable transport?</li><li>• Enable sustainable transport infrastructure enhancements?</li><li>• Promote improved local connectivity and pedestrian and cyclist movement?</li><li>• Facilitate on-going high levels of home and remote working?</li><li>• Improve road safety?</li><li>• Reduce the impact on residents from the road network?</li><li>• Improve parking facilities?</li></ul>
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## Scoping consultation responses

The SEA scoping report was shared with the Environment Agency, Historic England and Natural England for formal consultation in 2022. The responses received and how they have been addressed are presented overleaf.

**Table All.1 SEA scoping consultation responses**

<b>Consultee</b>	<b>Consultation response summary</b>	<b>AECOM response</b>
<b>Environment Agency</b>	No response received	
<b>Historic England</b>	<p>Having reviewed the Scoping Report, we consider that it proposes a comprehensive baseline with regard to historic environment information. We note that the HER records referenced have been obtained via Heritage Gateway. The SEA assessment itself should use up to date information obtained directly from the HER.</p> <p>Historic England strongly advises that the conservation and archaeological staff of the relevant local planning authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), which should be consulted as part of the SEA process. In addition, they will be able to advise how any site allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.</p> <p>To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that, despite the SEA, these would have an adverse effect upon the environment.</p>	Noted, with thanks.
<b>Natural England</b>	Natural England has no specific comments to make on this neighbourhood plan SEA scoping.	Noted, with thanks.

