

Bungay Neighbourhood Development Plan

Strategic Environmental Assessment Environmental Report



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Non-Technical Summary

Introduction

1. [Collective Community Planning](#) has been commissioned to undertake a Strategic Environmental Assessment (SEA) in support of the emerging Bungay Neighbourhood Development Plan (BNDP).
2. SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and its alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the BNDP is a legal requirement.
3. The BNDP Environmental Report accompanies the submission version of the plan for Regulation 16 Consultation. Revisions to policies made following the Regulation 14 consultation have been checked against the SEA to ensure the assessments remain valid.

Structure of the Environmental Report

4. SEA reporting essentially involves answering the following questions in turn:
 - What has plan making / SEA involved up to this point?
 - What are the SEA findings at this stage?
 - What happens next?
5. Each of these questions is answered in turn within this Environmental Report. The context of BNDP is also provided, setting out what the plan is aiming to achieve, and also the scope of this SEA.

What is the Plan aiming to achieve?

6. A vision for BNDP has been established:

Bungay will be known as an historic and distinctive market town with a vibrant town centre that is set in a unique landscape and which has a strong local identity. Bungay will be a place that people choose to visit, as well as live and work. In the next 15 to 20 years the town will host a mix of new housing built to a high green standard and community facilities that meet the needs of residents and the surrounding rural communities. Bungay will be a sustainable place with increased local employment and leisure facilities. People will choose to walk and cycle and have a greener approach to local transport generally. Access to open spaces and the surrounding countryside will be excellent and there will be a focus on the health and well-being of residents, whilst at the same time Bungay will enjoy on-going protection of the valued ecology and landscape. Furthermore, tourists will enjoy a range of facilities and places to stay.

7. This vision is underpinned by a number of objectives:
 1. *Meet the housing and infrastructure needs of Bungay's residents and future population.*
 2. *Protect and enhance community and public facilities and services.*

3. *Support the vitality and regeneration of the town centre.*
4. *Enable Bungay to realise its potential as a visitor attraction.*
5. *Improve the attractiveness of walking and cycling.*
6. *Ensure that the built character of Bungay is preserved and is reflected in new developments.*
7. *Promote the quality and enjoyment of the natural environment, especially the surrounding fen, marshes and Broads.*
8. *Ensure that new development manages flood risk in the most sustainable way possible.*

What is the scope of this SEA?

8. The scope of this SEA is reflected in a list of themes, objectives and questions, which taken together provide a framework for assessment. A summary framework is presented below, with the full framework presented within the main Environmental Report, in Figure 2.

SEA Theme	SEA Objective
Biodiversity	<ul style="list-style-type: none"> • To maintain and enhance the extent, quality and connectivity of biodiversity sites and ecological networks within and surrounding the BNDP area.
Climate change	<ul style="list-style-type: none"> • Support the resilience of the BNDP area to the potential effects of climate change. • Reduce carbon dioxide emissions within the BNDP area.
Landscape	<ul style="list-style-type: none"> • To protect and enhance the character and quality of the immediate and surrounding landscape, including the Broads and strategic green infrastructure links.
Water resources, soil and land	<ul style="list-style-type: none"> • To protect and enhance the water quality and use and manage water resources in a sustainable manner. • Promote the efficient use of land
Historic environment	<ul style="list-style-type: none"> • To protect, conserve and enhance the historic environment within and surrounding the BNDP area and create a sustainable and attractive town centre environment.
Population and health	<ul style="list-style-type: none"> • To improve the health and wellbeing of residents within the BNDP area
Accessibility and transport	<ul style="list-style-type: none"> • To improve accessibility to services and facilities, particularly by sustainable travel options.

Plan-making / SEA up to this point

9. An important element of the SEA process involves assessing reasonable alternatives in time to inform development of draft proposals, and then publishing information on reasonable alternatives for consultation alongside the draft proposals / plan.
10. Part 1 of this Environmental Report explains how work was undertaken to develop and assess a reasonable range of alternative approaches for BNDP. It explains the process of establishing reasonable alternatives; presents the outcomes of assessing the reasonable alternatives; and explains reasons for developing a preferred option, in light of the assessment undertaken.

Establishing reasonable alternatives

11. Part 1 of the Environmental Report explores both the strategic parameters provided by the East Suffolk Waveney and Broads Authority Local Plans and the available site options, to establish alternatives to the preferred approach for housing development.
12. Reasonable alternatives were considered in relation to the location of additional housing growth. The indicative housing requirement provided by East Suffolk Council is 67 dwellings. Two reasonable alternative sites were identified as potentially suitable for development from the detailed site assessment work. Based on this, two options for allocation were established, and one of these is only reasonable able to accommodate 5 dwellings. As a result of this, the differences between the options are relatively small, as each option includes development at land south of Mountbatten Road.

Site Reference	Option 1	Option 2
BNDP03 Land between Pilgrims Way and Wingfield	0	5
BNDP04 Land South of Mountbatten Road	70	65

Assessing reasonable alternatives

13. The full assessment of the options for each option are presented in Part 1 of this Environmental Report. The summary findings are presented below.

SEA Theme	Option 1	Option 2
Biodiversity	2	1
Climate Change	1	2
Landscape	=	=
Water Resources, Soil and Land	1	2
Historic Environment	2	1
Population and Health	=	=
Accessibility and Transport	1	2

14. Overall, the assessment has served to highlight the potential for **significant negative effects**. No negative effects of significance have been identified for either option.
15. **Minor negative effects** are anticipated in relation to climate change, natural resources, the historic environment and transport. This is because both options will result in development of an edge of town centre site, which will result in additional car journeys into and through the town centre. The development has the potential to impact on assets of historic significance located nearby.
16. **Minor positive effects** are concluded in relation to biodiversity and population and health. This relates to the delivery of affordable housing to meet local need, good access to the wider countryside and leisure activities and potential for enhancing ecological networks.
17. **Uncertainty** is noted in relation to water resources, soil and land for option 1, reflecting the need for more detailed land surveys to inform agricultural classification.

18. With no significant deviations from the baseline anticipated in relation to landscape, broadly **neutral effects** are concluded.
19. In **conclusion**, the assessment shows that option 1 marginally outperforms option 2, though this does not mean that option 1 is the best or most sustainable overall, as the objectives are not assigned any particular weight. It is for the Bungay Neighbourhood Plan Steering Group to weigh the pros and cons of the alternatives in the balance and reach an overall conclusion on the best performing scenario.

Developing the preferred approach

20. The BNDP steering group provided the following reasons for developing the preferred approach in light of the assessment of alternatives:
21. Option 1 is considered by the Bungay Neighbourhood Plan Steering Group as the preferred option for delivering 70 additional new homes within the BNDP area.
22. It is recognised that option 2 presents a reasonable alternative, and there could be great potential to deliver additional green open space in the town centre, and with a sensitively designed scheme, improve the setting of the Conservation Area. Given known interest from the landowner to develop the site for more than 5 dwellings, indications are that there is a lack of appetite at this stage to develop BNDP03 for just 5 dwellings.
23. Reducing the number of dwellings to be delivered on BNDP04 as part of option 2 would deliver fewer Affordable / First Homes, which are evidenced by the Bungay Housing Needs Assessment to be much needed within the area.
24. On balance, it is also felt that given BNDP03 is located within the current settlement boundary, it could quite legitimately come forward within the plan period anyway, without having to be allocated.
25. The preferred approach is to allocate BNDP04, option 1 within the plan to meet the indicative housing figure provided by East Suffolk Council.

Assessment findings at this stage

26. Part 2 of the Environmental Report presents an assessment of the draft BNDP. Assessment findings are presented as a series of narratives under the SEA framework theme headings. The following overall conclusions have been reached:

SEA Theme	Conclusions
Biodiversity	There is a clear awareness throughout the BNDP of the importance of avoiding harm to Bungay's natural environment and the significance of this. A number of policies provide specific provisions to support the protection and enhancement of biodiversity, including retaining natural features, enhancing habitat connectivity and achieving a biodiversity benefit of features delivered through development – such as SuDS.

SEA Theme	Conclusions
	Overall it is considered that BNDP will have a long-term positive impact on the biodiversity theme.
Climate change	There is a real focus in the plan on delivering improvements to sustainable travel infrastructure, particularly walking and cycling infrastructure, including a new 'green corridor' linking development in the south to the town centre. Balanced against this, the allocation for 70 new homes on the outskirts of the town and potential for a new car park will encourage more vehicular trips. Opportunity is taken to promote sustainable design and construction approaches for all new development, with a requirement to maximise the potential to achieve net zero carbon emissions. Overall it is considered that BNDP will have a long-term positive impact on the climate change theme.
Landscape	BNDP seeks to ensure that new development is sensitively designed to minimise any impacts on the landscape character of the area. This includes the promotion of new green infrastructure that could enhance the area. Although the proposed allocation is to the south of the town, thus extending Bungay into the surrounding countryside, this area has been assessed as having low landscape sensitivity, and the allocation policy includes provision for a landscape barrier. The plan allows for new tourist accommodation, including that located adjacent the development boundary, which has the potential to impact on landscape character, depending on proposals coming forward. Overall BNDP is assessed as having neutral impacts on the landscape theme.
Water resources, soil and land	BNDP contains a range of mitigation policies with respect to water and land management which will serve to reduce the impact of future development. Despite this, the plan allocates greenfield land, currently used for agriculture, for 70 new homes. There is potential for this to be among the best and most versatile land in the country. Overall, long-term minor negative impacts on the water resource, soil and land are anticipated.
Historic environment	Bungay has a wealth of historic assets, which could be sensitive to future development. The plan contains a range of policies to support protection of such assets, including heritage features within close proximity of the site allocation. There is also provision to enhance a particular asset of community importance within the town centre. Overall BNDP is assessed as having long-term minor positive impacts on the heritage theme.
Population and health	The delivery of housing, and its targeted mix to meet community need, is a significant positive of BNDP. Additionally, the plan contains a range of policies to improve walking and cycling infrastructure, which will in turn promote active travel within the town. BNDP also promotes the continued expansion of leisure, health and community facilities, with a focus on physical activity and healthcare. Overall BNDP is assessed as having long-term significant positive impacts on the population and health theme.

SEA Theme	Conclusions
Accessibility and transport	The plan promotes improvements to sustainable transport infrastructure, which will support achievement of a modal shift within the town. This will help to reduce the number of new car trips associated with the planned development, though given the geography of Bungay, with the A144 running through the town centre, it is likely that development will give rise to an increase in vehicular traffic through the centre. Overall BNDP is assessed as having long-term minor negative impacts on the accessibility and transport theme.

Recommendations

27. The appraisal of the draft BNDP has identified the following recommended mitigation measures which seek to minimise the potential for negative effects and maximise the potential for positive effects in relation to the relevant SEA themes:

- **Biodiversity:** it is recommended that language in policy **ENV1** is amended to achieve greater consistency with emerging national policy with refers to biodiversity net gain, rather than natural capital.
- **Biodiversity & Landscape:** it is recommended that further clarity to be provided in policy **TC&E2** in relation to the types of proposals that would be supported, with large scale hotel development not supported outside of the development boundary.
- **Climate Change:** to mitigate against an increase in emissions as a result of housing development planned through BNDP opportunities should be taken to ensure sustainable design and construction principles are used and there has been proactive planning (through new cycle/walking/greenways) to encourage sustainable travel. It is recommended this is incorporated into policy **H1** and **TM4** on design.
- **Water resources, soil and land:** to enhance **ENV5** it is recommended that Sustainable Drainage Systems are required unless it can be demonstrated that they are not technically feasible.
- **Historic environment:** it is recommended that consideration is given to widening the policy framework to promote enhancement to other heritage assets (in addition to the King's Head), in particular Bungay Castle which is on the Heritage At Risk Register.

Next Steps

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

29. Following submission, the plan and supporting evidence, including the SEA Environmental Report, will be published for further consultation, and then subject to an independent examination. At examination, BNDP will be considered in terms of whether it meets the

Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plans.

30. If the examination leads to a favourable outcome, BNDP will then be subject to a referendum, organised by the Local Planning Authority. If more than 50% of those who vote agree with BNDP, then it will be 'made'. Once 'made' BNDP will become part of the development plan for East Suffolk and the Broads Authority, covering the defined neighbourhood area.
31. The SEA regulations require *measures envisaged concerning monitoring* to be outlined in this report. This refers to the monitoring of likely significant effects of BNDP to identify any unforeseen effects early and take remedial action as appropriate.
32. It is anticipated that monitoring of effects of BNDP will be undertaken by East Suffolk Council and the Broads Authority as part of the process of preparing their Annual Monitoring Reports (AMR). No additional monitoring measures have been identified at this stage.

Introduction

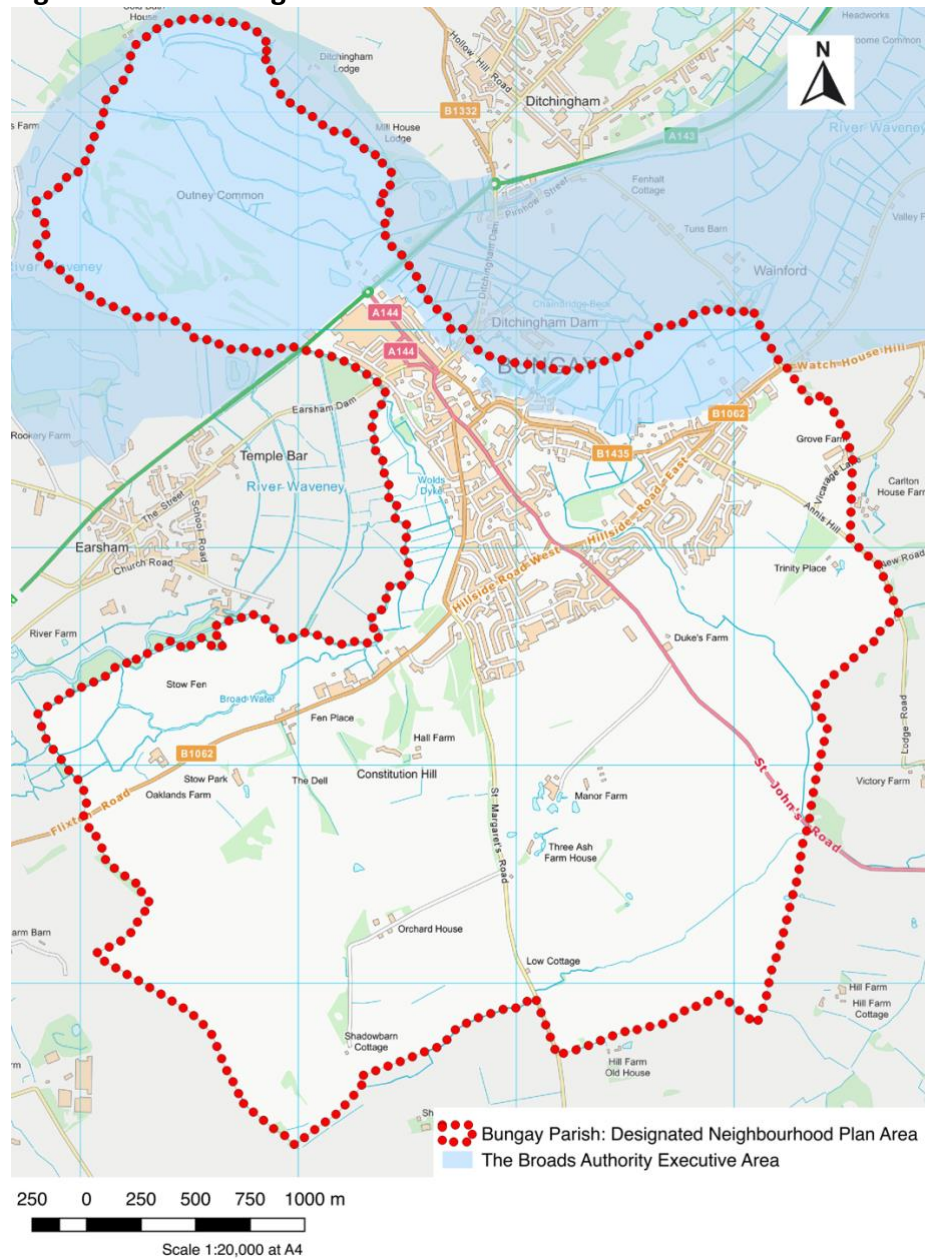
33. Collective Community Planning has been commissioned by the Bungay Neighbourhood Development Plan (BNDP) Steering Group to lead the Strategic Environmental Assessment process in support of the emerging BNDP.
34. The BNDP is being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012, and in the context of the Local Plans for East Suffolk Waveney and the Broads Authority.
35. Once 'made' the BNDP will have material weight when determining planning applications, alongside the current local plans.
36. 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. Screening of BNDP identified the potential for significant effects on the environment and therefore a full SEA is required.
37. It is a requirement that SEA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended), which transposed into national law EU Directive 2001/42/EC on SEA.
38. A report known as the Environmental Report must be published for consultation alongside the draft plan, which "*identifies, describes and evaluates*" the likely significant effects of implementing "*the plan, and reasonable alternatives*". The report must be considered alongside consultation responses when finalising the plan.
39. The Environmental Report sets out information to meet the requirements of the Regulations and sets out information in relation to the following questions:
 - What has plan-making / SEA involved up to this point?
 - What are the SEA findings at this stage?
 - What happens next
40. This Environmental Report for the BNDP is to be published alongside the submission version of the plan, under Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended).
41. Each of the questions identified above have been answered in a different section of this report.

What is the Bungay Neighbourhood Plan aiming to achieve?

42. This section considers the strategic planning context provided by the East Suffolk Waveney and Broads Authority Local Plans. It goes on to present the vision and objectives for the BNDP.

43. The designated plan area is identified in **Figure 1**.

Figure 1: BNDP designated area



44. The BNDP sits within two local authority areas, East Suffolk and the Broads Authority. As a result, there are two adopted Local Plans which the Neighbourhood Plan will need to be in general conformity with. **Figure 1** highlights the extent of the Broads Authority Executive Area within the BNDP area.

45. On 1 April 2019, East Suffolk Council was created by parliamentary order, covering the former districts of Suffolk Coastal District Council and Waveney District Council. The Waveney Local Plan remains the current planning document for the Waveney part of the East Suffolk Council area until such time that it is replaced. The East Suffolk Council Waveney Local Plan, adopted in March 2019, covers the period 2014-36.

46. The Local Plan for the Broads, adopted May 2019, contains the policies and land allocation to help determine planning applications within the Broads Authority Executive Area.
47. In East Suffolk, the Local Plan Policy WLP1.1 on the Scale and Location of Growth sets out that Bungay will accommodate approximately 6% of total housing growth across the district. The plan allocates two sites for housing (and other uses) to the south-east of the town off St John's Road. These allocations will deliver approximately 485 new homes, of which 150 already have outline planning permission. At the time of writing the Local Plan (March 2017) this was in addition to 72 new homes on unallocated sites already completed or with planning permission granted since the beginning of the Local Plan Period. The Local Plan Policy WLP1.2 sets out that Neighbourhood Plans can allocate additional land for residential, employment or town centre development providing that adjustments and allocations do not undermine the overall distribution strategy outlined in WLP1.1. The indicative housing requirement agreed and provided by East Suffolk Council for Bungay Neighbourhood Plan is 67. This has been identified based on an agreed methodology set out in Neighbourhood Plans – Indicative Housing Requirements, East Suffolk Council, July 2021¹. On page 5 of this document it states:

“Whilst it is for Qualifying Bodies to choose whether to plan for housing or not, the PPG (paragraph 103) states that neighbourhood planning bodies are encouraged to plan to meet their housing requirement, and where possible to exceed it. As the Local Plans contain strategies to meet, and exceed, the housing requirements for the Local Plan areas, the provision of additional housing figures to Neighbourhood Plan areas should be seen as providing an opportunity for an appropriate level of additional growth. In this respect the figures are not intended as minimums or maximums but as an indication of the level of the approximate level of growth that could be planned for. The Council will however expect Qualifying Bodies who have asked for an indicative housing requirement to take a positive approach towards planning for it. For Qualifying Bodies who wish to meet the requirements of paragraph 14b) of the NPPF, indicative housing requirements need to be met in full and Neighbourhood Plans will need to include allocation(s), although a policy on windfall allowance may form a part of the approach.”

48. The indicative housing requirement for the part of the BNDP area in the Broads is zero.
49. The **Vision** for BNDP is that Bungay will be a historic and distinctive market town with a strong local identity and a vibrant town centre, Bungay is a place that people choose to visit. In the next 15 to 20 years the town will host a mix of new housing built to a high green standard and community facilities that meet the needs of its residents and the surrounding rural communities. Our Plan is to develop a sustainable Bungay with increased local employment and leisure facilities; to establish a green policy to encourage walking, cycling and a greener approach to local transport generally. Enhancing access to open spaces and the surrounding countryside is to be a priority within the Plan with a focus on the health and wellbeing of residents. Facilities for tourists will be encouraged.

¹ <https://www.eastsuffolk.gov.uk/assets/Planning/Neighbourhood-Planning/Preparing-a-Neighbourhood-Plan/Neighbourhood-Plans-Indicative-Housing-Requirements-methodology.pdf>

50. This is underpinned by the following **objectives**:

Objective 1 - Meet the housing and infrastructure needs of Bungay's residents and future population.

Objective 2 – Protect and enhance community and public facilities and services.

Objective 3 - Support the vitality and regeneration of the town centre.

Objective 4 - Enable Bungay to realise its potential as a visitor attraction.

Objective 5 - Improve the attractiveness of walking and cycling.

Objective 6 - Ensure that the built character of Bungay is preserved and is reflected in new developments.

Objective 7 - Promote the quality and enjoyment of the natural environment, especially the surrounding fen and marshes.

Objective 8 - Ensure that new development manages flood risk in the most sustainable way possible.

What is the scope of this SEA?

51. A scoping exercise for this SEA was carried out in March 2021. This involved exploring the policy context, establishing a baseline, identifying issues and opportunities for the Neighbourhood Plan and developing an assessment framework for the SEA. The scoping report is provided at **Appendix B**.

52. The SEA Regulations require that *“when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”*. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.² As such, these authorities were consulted in April/May 2021. Consultation responses can be found alongside the updated scoping information presented in **Appendix B**.

53. The scoping information has identified seven themes that remain a focus for the SEA. The key issues identified against each of these themes are presented below.

54. Biodiversity:

- Development coming forward as part of BNDP should consider likely additional recreational impacts, and plan for good access to open and green spaces that will reduce recreational pressure on nearby designated sites.
- The nationally designated SSSIs nearby to the BNDP area are mostly woodland, with some of these currently closed to the public. There is potential that development will result in increased recreational disturbance to those which are open to the public.

² 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)).

- Priority Habitat can be sensitive to development, and growth which comes forward as part of BNDP should seek to avoid the loss or fragmentation of this. As described above, some of this is already quite fragmented, in the southern part of the BNDP area. There is an opportunity for BNDP to include site specific mitigation or habitat enhancement requirements in relation to allocated sites. Where appropriate this could be informed through the Habitat Network Enhancement Zones identified.
- Within the built-up area of Bungay there are limited green spaces or connectivity between them and few areas that are important for natural flora and fauna. It is important to ensure that existing green spaces, such as the old burial ground on Hillside Road West, are not at risk of becoming isolated through new development.

55. Climate change:

- Waveney/East Suffolk has lower CO₂ emissions per capita when compared with equivalent data at regional and national levels, but there remains some way to go before the target of carbon neutrality is achieved.
- Per capita CO₂ emissions from transport have remained static since 2005 and as emissions from other sectors have reduced, transport's share of emissions overall has risen. Opportunities should be taken for BNDP to support enabling infrastructure such as electric vehicle charging points.
- Areas of high fluvial flood risk largely follow the River Waveney. Future development should avoid areas of high flood risk to better safeguard future residents and their properties

56. Landscape:

- The Norfolk and Suffolk Broads form part of the BNDP area and are a place in which the quality of landscape is formally recognised and given statutory status to conserve and enhance natural beauty and promote open-air recreation. These special qualities are protected under legislation and through planning policy. Care needs to be taken when landscape change occurs in this area to ensure that the positive characteristics that contribute its unique sense of place are conserved and enhanced.
- The visual impacts of the built development and infrastructure around Bungay can detract from the perceived naturalness of the area, including to the north and south of the settlement. Opportunities to mitigate against these impacts could be sought.
- There is limited access to green open space within the Bungay. BNDP provides opportunities for enhanced landscape protections and provision with respect to new green infrastructure requirements in Bungay. The 'accessibility and transport' theme considers access into the countryside, via public rights of way in more detail, with this generally considered to be good.

57. Water resources, soil and land

- Recent data indicates that the chemical status of water in the BNDP area has declined, and this could be exacerbated by further growth. The BNDP should ensure that measures are taken to avoid detrimental impacts and where possible improve water quality through development.

- There is high potential for the best and most versatile agricultural land to exist within the BNDP area, though the precise classification is unknown. BNDP provides the opportunity to avoid or minimise the loss of agricultural land in these areas.
- With regards to mineral safeguarding areas, the BNDP falls within a minerals consultation area, which means that sand and gravel resources may be present and need to be safeguarded

58. Historic environment

- Bungay has a rich history and a wealth of designated heritage assets exist today, particularly in the historic core of the town which is designated a Conservation Area. This requires careful protection and sympathetic conservation. Future development will need to minimise impacts upon this and take opportunities to improve the public realm.
- Bungay Castle is on the heritage at risk register, and opportunities should be taken to restore the asset. Within the town centre there are also assets of local heritage value that may require protection.

59. Population and health:

- The population has remained fairly static over the last 18 years, increasing by just 4%. Planned development of almost 500 new homes will result in a more significant increase in population over the next 20 years, which may put pressure on local services and facilities.
- Analysis of population and housing in the BNDP area indicates the population is skewed towards an increasingly elderly population and a need for smaller more affordable homes. Choice of housing for those on low incomes is extremely limited, and should new development not result in more affordable housing coming forward, then this may lead to difficulty in retaining young families and a further skew in the population.
- Adult obesity and inactivity are a cause for concern across the wider district area, which means they could also be for the BNDP area. Encouraging greater levels of activity including through walking and cycling, and greater access to greenspace is important.
- Parts of the BNDP area are relatively deprived in relation to income, employment and the living environment.

60. Accessibility and transport:

- There is a requirement for investment in a range of services and facilities to support sustainable growth within the town. Without this people may need to travel elsewhere to access services and car use could increase.
- It is possible that future development on the outskirts of the town could result in more people driving into the town centre to access key services and facilities. It is important that there is investment in local infrastructure and services alongside development, and good walking and cycle routes are established that link with the town centre.
- The impact of HGVs travelling through the town centre is felt by residents and recognised to impact upon the economy, safety and historic environment.

61. Informed by the scoping information and development of key issues, the SEA framework is summarised in **Figure 2** as a list of key themes, SEA objectives and assessment questions.

Figure 2: SEA Framework

SEA Theme	SEA Objective	Assessment Questions (will the option or proposal help to)
Biodiversity	To maintain and enhance the extent, quality and connectivity of biodiversity sites and ecological networks within and surrounding the BNDP area.	<ul style="list-style-type: none"> • Support protection and enhancement of designated sites? • Deliver more or enhanced open green spaces? • Create opportunity for improved connectivity between green spaces in the built-up area of Bungay? • Ensure existing open green spaces do not become isolated. • Protect and enhance areas of priority habitat and ecological connectivity between them? • Support habitat improvement in line with emerging national requirements for biodiversity net gain?
Climate change	Support the resilience of the BNDP area to the potential effects of climate change.	<ul style="list-style-type: none"> • Ensure development is directed away from areas at risk of flooding? • Increase the resilience of the local built or natural environment? • Improve or extend green infrastructure networks? • Promote Sustainable Drainage Systems?
	Reduce carbon dioxide emissions within the BNDP area.	<ul style="list-style-type: none"> • Promote sustainable modes of travel? • Reduce the need to travel by car? • Provide infrastructure to support the uptake of low emission vehicles? • Promote renewable energy sources?

SEA Theme	SEA Objective	Assessment Questions (will the option or proposal help to)
		<ul style="list-style-type: none"> • Increase the level of low carbon or energy efficient homes?
Landscape	To protect and enhance the character and quality of the immediate and surrounding landscape, including the Broads and strategic green infrastructure links.	<ul style="list-style-type: none"> • Provide an opportunity for greater landscape buffer between the settlement and surrounding rural landscape? • Protect, increase or enhance access to green infrastructure networks? • Retain and enhance landscape features that contribute to the setting of the River Waveney and rural setting such as hedgerow and hedgerow trees?
Water resources, soil and land	To protect and enhance the water quality and use and manage water resources in a sustainable manner.	<ul style="list-style-type: none"> • Avoid impacts on water quality and promote improvements? • Promote the use of sustainable drainage systems? • Protect waterbodies from pollution? • Maximise opportunities for water efficiency?
	Promote the efficient use of land.	<ul style="list-style-type: none"> • Avoid the loss of the best and most versatile agricultural land? • Promote the use of previously developed or underutilised land? • Avoid the unnecessary sterilisation of access to mineral resources in the BNDP area?
Historic environment	To protect, conserve and enhance the historic environment within and surrounding the BNDP area and create a sustainable and attractive town centre environment.	<ul style="list-style-type: none"> • Conserve and enhance buildings of architectural or historic interest, including designated heritage assets and their settings? • Conserve and enhance locally important heritage features within the BNDP area? • Support improved access to and understanding of heritage assets, historic character and its evolution in the BNDP area? • Enhance the public realm within the town centre?

SEA Theme	SEA Objective	Assessment Questions (will the option or proposal help to)
		<ul style="list-style-type: none"> • Ensure design of any new development retains and enhances the local character and historic distinctiveness of Bungay in line with the Design Guide?
Population and health	To improve the health and wellbeing of residents within the BNDP area	<ul style="list-style-type: none"> • Increase availability of smaller affordable homes? • Promote the use of active travel such as walking and cycling? • Promote recreational activities involving walking and cycling, including access into the wider countryside via public rights of way • Provide greater access to green space? • Enhance accessibility to a range of services including health, leisure and community facilities? • Avoid negative impacts on existing services and facilities?
Accessibility and transport	To improve accessibility to services and facilities, particularly by sustainable travel options.	<ul style="list-style-type: none"> • Support delivery of new services and facilities within the town? • Enhance accessibility to a range of local services and facilities? • Support retention of existing local services and facilities? • Promote the use of active travel such as walking and cycling? • Promote recreational activities involving walking and cycling, including access into the wider countryside? • Address the impact on motorised transport through the town centre, including HGVs?

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

Introduction

62. The narrative of plan-making and SEA for BNDP is set out below, including ways in which BNDP has been shaped by the consideration of reasonable alternatives.
63. A key element of the SEA process is the appraisal of reasonable alternatives for the Neighbourhood Plan. The SEA Regulations³ 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*'. Planning Practice Guidance (Reg Para 038 Reference ID: 11-038-20190722) provides further explanation '*reasonable alternatives are the different realistic options considered in developing the policies in the plan. They need to be sufficiently distinct to highlight the different environmental implications of each so that meaningful comparisons can be made.*'
64. The SEA Regulations stipulate that the Environmental Report must include:
- An outline of the reasons for selecting the alternatives;
 - The likely significant effects on the environment associated with alternatives;
 - An outline of the reasons for selecting the preferred approach in light of the alternatives appraised.
65. Given that housing growth is a key concern of local residents and the delivery of new homes is most likely to have a significant effect compared to other proposals within the plan, work on reasonable alternatives through this SEA has focused on different options for delivering the housing requirement. Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

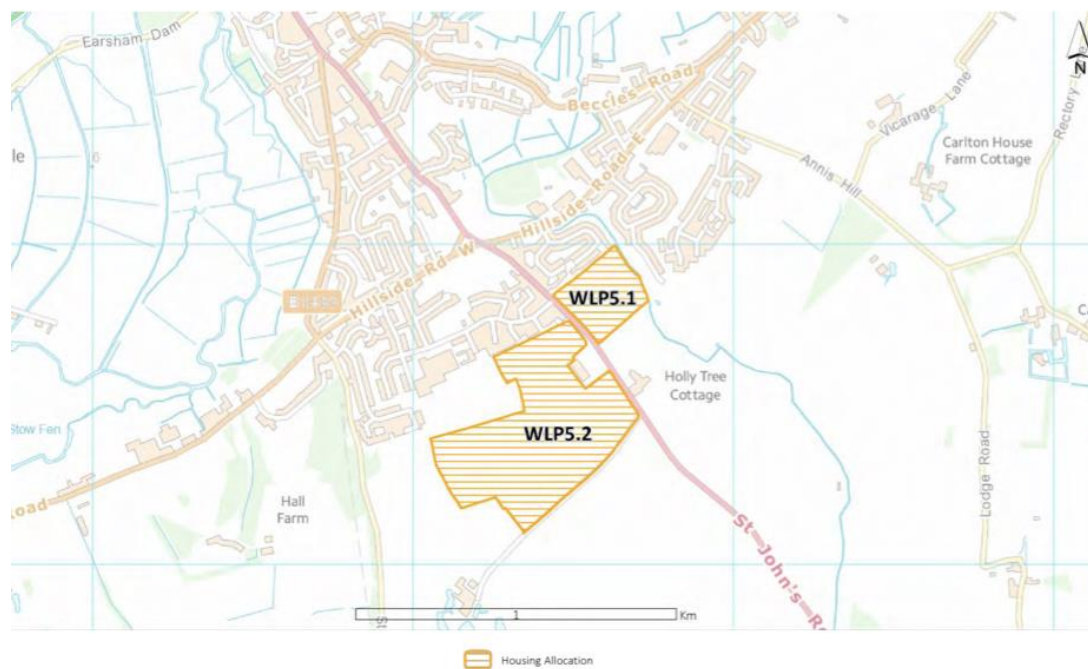
Plan making so far

66. Work to develop the BNDP has been underway since 2016. The scope, objectives and draft policies of the plan have evolved in response to extensive engagement with the local community and by the Town Council and Neighbourhood Plan working groups alongside external technical input. Additionally, the planning policy context for the Neighbourhood Plan has evolved whilst plan-making has been underway. The most significant development has been the publication of the East Suffolk Waveney Local Plan in 2019, which has necessitated changes to the BNDP, particularly in relation to the quantum of development it delivers.
67. As set out in para 5.2, the East Suffolk Waveney Local Plan allocates land for approximately 485 homes, of which 150 already have planning permission. This is across two sites, see **Figure 3**, each of which is located to the south of the town.

³ Environmental Assessment of Plans and Programmes Regulations 2004

Figure 3: Site Allocations for Bungay in the Local Plan

Figure 16 - Strategic site allocations in Bungay



Policy	Location	Allocation
WLP5.1	Land east of St Johns Road, Bungay	Residential development
WLP5.2	Land west of St Johns Road, Bungay	Residential development and employment development

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68. The Local Plan Policy WLP1.2 sets out that Neighbourhood Plans can allocate additional land for residential, employment or town centre development providing that adjustments and allocations do not undermine the overall distribution strategy outlined in WLP1.1. The indicative housing requirement agreed and provided by East Suffolk Council for Bungay Neighbourhood Plan is 67, as set out in paragraph 47 above.

69. To explore potential site options for allocation the Neighbourhood Plan group have tested a number of sites around Bungay. Each of these sites were identified through East Suffolk (Waveney) District Council call for sites in 2015. Following work locally to establish that these sites were still being promoted by the landowner, a detailed technical site assessment was conducted by Small Fish Strategy Consultants in June 2019⁴ which appraised four identified site options. Of the four sites assessed, two are either suitable or potentially suitable for allocation in BNDP, see **Figure 4 and 5**. The other two sites were found to be unsuitable for allocation due to the level of constraint affecting each one.

Figure 4: Sites found suitable or potentially suitable

Site reference	Site name	Size (ha)	Potential capacity
BNDP03	Land between Pilgrims Way and Wingfield Street	1.4	30

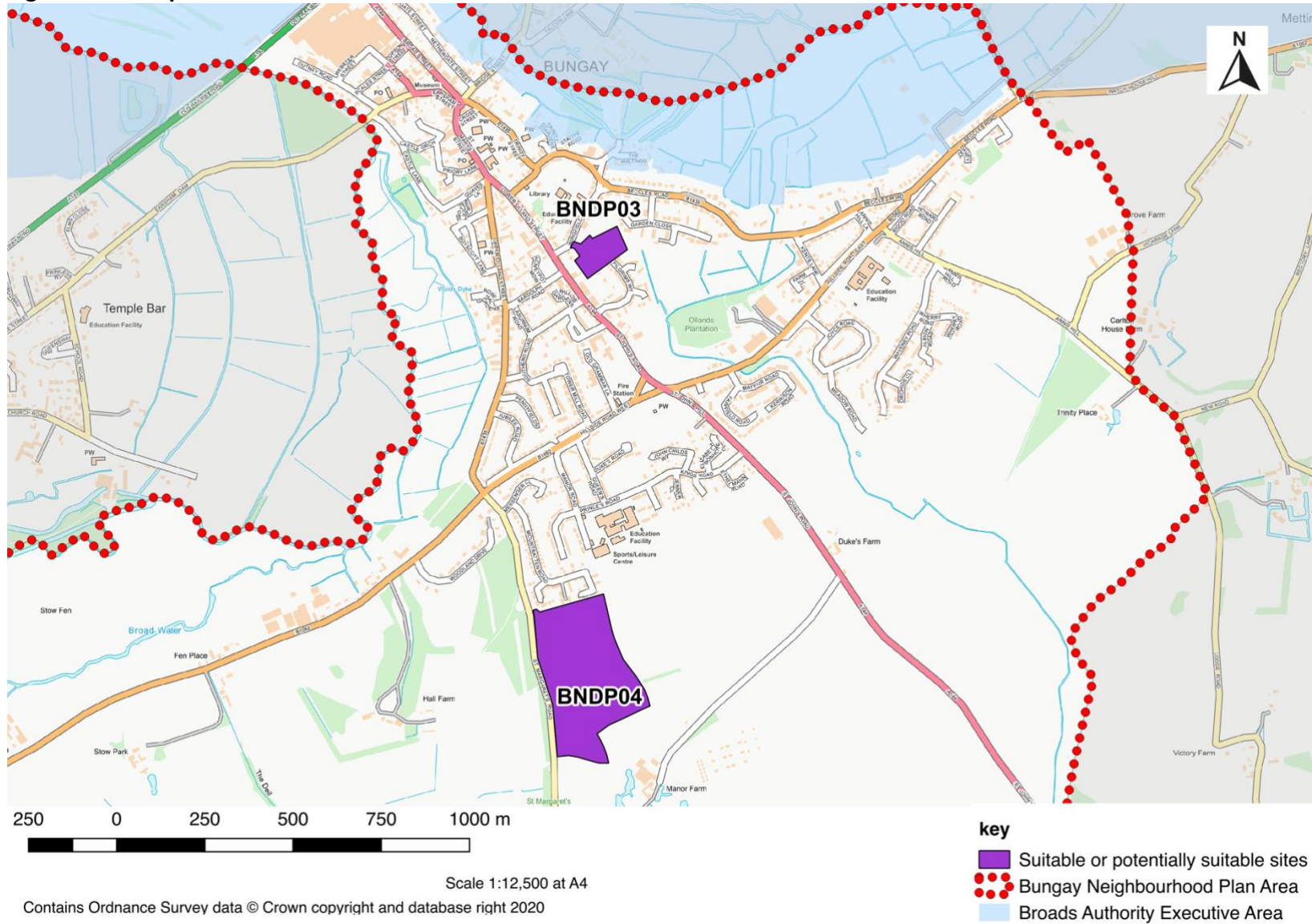
⁴ <http://bungayndp.org.uk/Bungay%20NDP%20-%20Site%20Assessment%20June%202019.pdf>

BNDP04	Land south of Mountbatten Road	10.28	257
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70. With regards to available sites, BNDP04 (**South of Mountbatten Road**), the entire site would deliver significant growth in the south of the settlement. The site assessment work recommended only partial allocation of the site with a reduced capacity. With this in mind and for the purposes of the SEA, a third of the capacity at the site has been progressed for consideration in the formulation of alternatives.
71. There is a notable constraint to progressing development at site BNDP03 (**Pilgrims Way**). Much of the site is at risk of flooding, which would require it to pass a sequential test prior to allocation and development. The site assessment work concludes that the risk of flooding leaves only 0.2ha sequentially preferable for development, which could accommodate around 5 dwellings. Safe access/egress would also need to be addressed. The site is within the settlement boundary and was subject to a planning application in 2020 for 40 dwellings⁵. This was refused on flood risk grounds. Considering these factors, the site is progressed for the formulation of alternatives on the basis of a revised capacity of 5.
72. A further local call for sites was undertaken in 2020, resulting in a number of sites being suggested by residents. Each of these were subsequently discounted on the basis that they did not relate to a specific site or were unavailable.
73. There have not been any recent planning applications submitted for sites within Bungay (apart from that at Pilgrims Way mentioned above) which should be considered in the context of future growth in the settlement.

⁵ <https://publicaccess.eastsuffolk.gov.uk/online-applications/applicationDetails.do?keyVal=QLHO62QXGQV00&activeTab=summary>

Figure 5: Site Options for BNDP



Scale 1:12,500 at A4

Contains Ordnance Survey data © Crown copyright and database right 2020

74. There are only two sites that can be considered in the formation of alternatives, BNDP03 and BNDP04 for the following reasons:

- Detailed site assessment work identified that 2 of the 4 sites assessed were unsuitable for allocation;
- A call for sites did not result in other available sites being put forward; and
- There have been no recent planning applications in Bungay that could be considered in the context of future growth in BNDP.

75. A red, amber, green (RAG) rating has been applied to each of these, indicating their potential for consideration in the development of alternatives to meet the indicative housing requirement. Red indicates that the site is not suitable to progress through the SEA, whereas green indicates a clear reason for progression. Amber sites are those sites where potential issues have been identified but that are considered further through the SEA in the formulation of alternatives.

Figure 6: SEA RAG rating of sites

Site Reference	Site Name	Revised capacity	RAG Rating
BNDP03	Land between Pilgrims Way and Wingfield Street	5	Amber
BNDP04	Land south of Mountbatten Road	70	Green

76. Planning Practice Guidance on Strategic Environmental Assessment states that *'reasonable alternatives are different realistic options considered in developing the policies in the plan. They need to be sufficiently distinct to highlight the different environmental implications of each so that meaningful comparisons can be made'*. In this case, where only two sites have been identified as available and deliverable, and one can only accommodate a small number of dwellings, achieving distinctly different options to meet the housing need is a challenge.

77. Relying on windfall development has also been considered in the formulation of alternatives. A 10% windfall rate would equate to 7 dwellings, which is not too dissimilar to the number that can be delivered on BNDP03, and given the lack of recent permissions in Bungay, there is a lack of confidence in this being achieved. Reliance on windfall is not considered to be a reasonable alternative.

78. Considering the above, the spatial strategy options considered as reasonable alternatives for delivering Bungay's housing need of 70 dwellings to 2036 is as follows (and presented in **Figure 7**):

- 70 dwellings on BNDP04 (Option 1)
- 5 dwellings at site BNDP03 and 65 at BNDP04 (Option 2).

Figure 7: Alternative site options for BNDP

Site Reference	Option 1	Option 2
New allocations		
BNDP03 Land between Pilgrims Way and Wingfield	0	5
BNDP04 Land South of Mountbatten Road	70	65

Assessing reasonable alternatives

79. For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping (see **Figure 2**) as a methodological framework. **Green** is used to indicate significant positive effects, whilst **red** is used to indicate significant negative effects. Minor effects are also identified, with **light green** indicating minor positive effects and **amber** indicating minor negative effects. Where appropriate neutral effects (no colour), or uncertainty will also be noted. Uncertainty is noted with **grey** shading.
80. Every effort is made to predict effects accurately, however, where there is a need to rely on judgements to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.
81. Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate **a rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the option or options that are preferred from an SEA perspective with 1 performing the best.
82. It is important to note that effects are predicted taking into account the criteria presented within Regulations⁶. Account is taken, for example of the duration, frequency and reversibility of effects.

Biodiversity

Biodiversity	Option 1	Option 2
Rank and likely effects	2	1

83. Neither options are located within close proximity of designated wildlife sites and there are no particular biodiversity features of note on either site.
84. BNDP04 is a greenfield site, currently agricultural land. Hedgerows at the site boundaries, and patch of trees in the north-east part of the site are likely to hold biodiversity values, the impact on these is uncertain. The site is located adjacent a strip of priority habitat,

⁶ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

broadleaf deciduous woodland, which is situated on the other side of St Margaret's Road. There could be an opportunity to improve ecological connectivity to this.

85. Part of the development for option 2, BNDP03, is located within a National Habitat Network Enhancement Zone 2, where opportunities to support habitat creation and enhance ecological links to corridors should be explored. This is an opportunity, as currently the land is overgrown and the potential of it is not being realised.
86. Overall, both options have the potential to support long-term minor positive effects as will support the delivery of enhanced green open space and habitat improvement in line with emerging national requirements and there are opportunities to improve ecological connectivity. Option 2 on balance could be marginally preferred as it falls within a National Habitat Network Enhancement Zone and there is potential to increase green space within the town centre.

Climate Change

Climate Change	Option 1	Option 2
Rank and likely effects	1	2

87. A primary consideration is the need to minimise per capita emissions from transport, reducing the need to travel and supporting a modal shift. Both options will encourage more car travel, particularly with BNDP04 which is located on the edge of the town centre. With respect to walking and cycling infrastructure, the scoping identifies that cycle provision in Bungay is currently limited, with routes connecting the town centre, facilities and residential areas indirect and difficult to navigate. There is an opportunity for BNDP04 to link with infrastructure delivered as part of the Local Plan allocations. There is also a public right of way which runs down the eastern boundary of the site, which links to the high school and residential areas to the north.
88. Option 2 includes some development within the town centre, which would help to reduce the need to travel, however the majority of growth would remain on the edge of the settlement.
89. Larger-scale development schemes may lead to economies of scale that can in turn enable delivery of low carbon infrastructure (eg. Ground source heat pumps or solar PV) and sustainable design and construction, to achieve net zero or CO2 emissions that exceed the requirements of Building Regulations. There is a degree of opportunity with option 1, where all housing growth will be delivered on one site, and there may be significant enough growth to support this.
90. With respect to climate change adaptation, a key consideration is fluvial and surface water flood risk. A significant part of BNDP03, option 2, falls within Flood Zone 2 and there is also risk of surface water flood risk. Any development would need to be directed away from this and there is a risk that development here would lead to likely significant effects. BNDP04 is not effected by fluvial or surface water flood risk.

91. Overall, both options are considered likely to lead to a deviation from the baseline, having minor negative effects. Option 1 is judged as performing best overall, given the slightly higher potential to achieve low carbon technologies / sustainable design principles and favourable location with respect to flood risk.

Landscape

Landscape	Option 1	Option 2
Rank and likely effects	=	=

92. The southern part of Bungay is characterised as a predominantly flat clay plateau which dominates the landscape. There are some open views as well as scattered woodland. Both options contain BNDP04, three sides of which are currently open to the wide countryside – although the development planned as part of allocations in the Local Plan will reduce this to two sides. Development of this site will reduce the landscape buffer between the settlement and the surrounding rural area. However, the site itself lacks distinctive landscape features and its landscape sensitivity is not high. The East Suffolk Waveney Landscape Sensitivity Study⁷ assesses this area to have high capacity for development.

93. BNDP03 is located in the town centre, within the current settlement boundary, therefore no effects on the baseline are envisaged in relation to development of this site.

94. There are some positives associated with development of both options, in that it could increase access to green infrastructure, with BNDP04 well located in terms of access to the wider countryside. These are not considered significant enough to result in a deviation from the baseline.

95. Overall, development under either option is not likely to lead to any significant deviation from the baseline, and broadly neutral effects are anticipated with both options judged to perform broadly on par.

Water Resources, Soil and Land

Water Resources, Soil and Land	Option 1	Option 2
Rank and likely effects	1	2

96. The great majority of agricultural land surrounding Bungay is shown to be Grade 3 quality but the nationally available dataset, which does not differentiate between grade 3a (classed as the best and most versatile) and 3b (not classed as the best and most versatile). None of the agricultural land surrounding Bungay has been surveyed in detail. Both options will result in the loss of grade 3 agricultural land, the quality of which is undetermined. The impact is therefore uncertain at this time.

⁷ <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/First-Draft-Local-Plan/Settlement-Fringe-Landscape-Sensitivity-Study.pdf>

97. Option 2 directs a small element of the development to an area considered ‘urban’, not having an impact on agricultural land. This option could be considered to be marginally preferable, were it to result in a reduction in the size of the allocation at BNDP04. At this stage, however this detail is also uncertain.
98. Both options contain sites that fall within Source Protection Zone 3, which means that there is potential for the development and construction activities associated with it to result in contamination of the water source. BNDP03 is within 200m of a water source and recent evidence indicates that water quality is not currently good for the River Waveney. Proximity to the water source is assessed as a potential issue with respect of option 2.
99. Both options would provide an opportunity for promotion of sustainable drainage systems, though it has been observed that BNDP03 was recently subject of a planning application, to which the Lead Local Flood Authority raised concerns about the proposed drainage scheme not meeting the policy requirements. This may be specific in relation to the development scheme proposed, but nonetheless is noted here.
100. Overall, there is an uncertain impact in relation to soil, reflecting the need for more detailed land surveys to inform agricultural classification. This applies to both options. Although both are also within Source Protection Zone 3, option 2 includes a site within close proximity of the water source, which has been judged to have greater potential for minor negative effects, which have been recognised in the overall rating.

Historic Environment

Historic Environment	Option 1	Option 2
Rank and likely effects	2	1

101. The methodology identified in Historic England’s *Advice Note 3: Site Allocations and Local Plans*⁸ has been used as a guide to consider the likely impact on the historic environment.
102. Both options are constrained by designated heritage assets. To the south side of Mountbatten Road lies Manor Farmhouse, a grade II listed building which is located around 150m to the south-east of BNDP04. The farmhouse dates back to 1675, with initials GB found on one of the roof timbers, which accords with the character of the house. There are some modern elements, including new windows. Development would need to consider the setting of the Grade II listed farmhouse and action taken to mitigate impact on this.
103. BNDP04 is within the vicinity of an area of disused military land, which lies to the south of Bungay. This means there may be findings of archaeological significance and development of this site may require further investigation of this.

⁸ <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans/>

104. An element of BNDP03 falls within the Conservation Area. This area however is considered to be untidy, and there is an opportunity through the development to enhance the Conservation Area and its setting through a sensitively designed scheme.
105. Overall the potential for negative effects is flagged under both options. Option 2 is considered to perform slightly better given the current land use associated with BNDP03 and opportunity to enhance the Conservation Area through sensitive design.

Population and Health

Population & Health	Option 1	Option 2
Rank and likely effects	=	=

106. Both options will deliver benefits in terms of affordable housing provision to meet current local need. Option 1 reflects a greater benefit in this respect as all housing would be delivered on a single site and BNDP03 would not deliver enough homes to attract affordable housing.
107. In terms of good access to green open space, the wider countryside and other leisure facilities, both options provide direct access to the wider countryside, linking well with the public right of way network, which is extensive to the south of the town. There is also good access to the leisure centre.
108. Option 2 would result in an element of housing being delivered in the town centre, which has greater potential to promote active travel and accessibility to services. However, it would attract less affordable housing overall as it would not meet the threshold of 11 dwellings set out in WLP8.2. There is potential for BNDP03 to include new open green space in the town centre, which is currently lacking, however, the inclusion of this is currently unknown.
109. Minor long-term positive effects are anticipated under both options, which are judged to perform broadly on par.

Accessibility and Transport

Accessibility & Transport	Option 1	Option 2
Rank and likely effects	1	2

110. A range of accessibility and transport factors have already been discussed above in relation to active travel modes, however, a key consideration here relates to the effects of development on traffic through the town centre. As the main A144 north which connects with the A143 runs through Bungay town centre and both options include development to the south of the town, both are assessed as having the potential to increase traffic through the town centre. This is either as residents travel into the town to access services and employment, or travel on elsewhere. There may also be impacts at the construction phase, with additional HGVs travelling through the town centre.

111. BNDP03, which is part of option 2, is within close proximity of the school, where there is most concern about congestion locally. Development, albeit for a small number of homes, could result in additional traffic at peak times that coincide with school operation hours.
112. Overall, minor negative effects are considered likely as a consequence of growth in respect of either options. Despite this, option 1 is judged to perform slightly better as option 2 involves a small amount of development nearby to Bungay Primary School, which locally is considered to be one of the worst spots for traffic congestion.

Summary Findings

Figure 8: Assessment Findings

SEA Theme	Option 1	Option 2
Biodiversity	2	1
Climate Change	1	2
Landscape	=	=
Water Resources, Soil and Land	1	2
Historic Environment	2	1
Population and Health	=	=
Accessibility and Transport	1	2

113. Overall, the assessment has served to highlight the potential for **significant negative effects**. No negative effects of significance have been identified for either option.
114. **Minor negative effects** are anticipated in relation to climate change, natural resources, the historic environment and transport. This is because both options will result in development of an edge of town centre site, which will result in additional car journeys into and through the town centre. The development has the potential to impact on assets of historic significance located nearby.
115. **Minor positive effects** are concluded in relation to biodiversity and population and health. This relates to the delivery of affordable housing to meet local need, good access to the wider countryside and leisure activities and potential for enhancing ecological networks.
116. **Uncertainty** is noted in relation to water resources, soil and land for option 1, reflecting the need for more detailed land surveys to inform agricultural classification.
117. With no significant deviations from the baseline anticipated in relation to landscape, broadly **neutral effects** are concluded.
118. In **conclusion**, the assessment shows that option 1 marginally outperforms option 2, though this does not mean that option 1 is the best or most sustainable overall, as the objectives are not assigned any particular weight. It is for the Bungay Neighbourhood Plan Steering Group to weigh the pros and cons of the alternatives in the balance and reach an overall conclusion on the best performing scenario – see **the next section on Developing a preferred approach**.

Developing the preferred approach

119. Option 1 is considered by the Bungay Neighbourhood Plan Steering Group as the preferred option for delivering 70 additional new homes within the BNDP area.
120. It is recognised that option 2 presents a reasonable alternative, and there could be great potential to deliver additional green open space in the town centre, and with a sensitively designed scheme, improve the setting of the Conservation Area. There are concerns however, about there being an appetite at this stage to develop BNDP03 for just 5 dwellings. A recent planning application that was refused by East Suffolk Council for 40 new homes on this site.
121. Reducing the number of dwellings to be delivered on BNDP04 as part of option 2 would deliver fewer Affordable / First Homes, which are evidenced by the Bungay Housing Needs Assessment to be much needed within the area.
122. On balance, it is also felt that given BNDP03 is located within the current settlement boundary, it could quite legitimately come forward within the plan period anyway, without having to be allocated.
- 123. The preferred approach is to allocate BNDP04, option 1 within the plan to meet the indicative housing figure provided by East Suffolk Council.**

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

Introduction

124. The aim of this section is to present findings and recommendations in relation to the current Regulation 14 consultation draft (May 2021) of the BNDP. This section of the report presents:

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

125. For each theme ‘significant effects’ of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 1 of the Regulations. For example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, such as the potential for BNDP to impact on an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect ‘characteristics’ are described within the assessment as appropriate.

126. Every effort is made to evaluate effects accurately; however, this is inherently challenging given the high-level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on the merits, or otherwise, in more general terms.

127. The submission version of the BNDP puts forward 25 policies to guide future development in the plan area and deliver the vision and objectives (identified in **Paragraphs 17 & 18**). Several policies have been updated since the Regulation 14 version of this Environmental Report, one policy removed, and a new policy on Bungay Castle added as a result of SEA recommendations. Any revisions have been checked against the SEA to ensure assessments remain valid.

Figure 9: BNDP Policies

Policy Theme	Policy Reference	Policy Name
Housing	H1	Design Principles for New Residential Development
	H2	Housing Mix
	H3	Affordable Housing
	H4	Land to the east of St Margaret’s Road
Community Matters	CM1	Community Hub
	CM2	Bungay Medical Centre
	CM3	Sports Facilities

Policy Theme	Policy Reference	Policy Name
	CM4	Pre-School Education
	CM5	Community Education
Cultural Heritage and Built Environment	CH1	Conservation Area
	CH2	The King's Head
	CH3	Bungay Castle
	CH4	Heritage Statements
Bungay Town Centre	TC&E1	Town Centre Vitality
	TC&E2	Tourism Accommodation
	TC&E3	Employment Growth and HGV Traffic
Environment	ENV1	Green Corridors
	ENV2	Open Space
	ENV3	Landscape and Ecological Character
	ENV4	Biodiversity
	ENV5	Flooding
Traffic and Transport	TM1	Parking Standards for New Residential Development
	TM2	Off-Street Public Car Parking
	TM3	HGV's in the Town Centre
	TM4	Sustainable Transport and Highway Safety

Appraisal of the Bungay Neighbourhood Plan

128. A full appraisal of each of the draft policies against the SEA framework is provided in **Appendix C**, a summary of impact against each theme is given below.

Biodiversity

129. The biodiversity SEA theme seeks the protection and enhancement of all bio and geodiversity features, including through biodiversity net gain where possible. There is a clear awareness throughout the BNDP of the importance of avoiding harm to Bungay's natural environment and the significance of this. Proposed **Policy ENV1**, **ENV3** and **ENV4** specifically relate to protecting and enhancing biodiversity, there are a number of other policies with biodiversity implications.

130. The main biodiversity constraints within the BNDP area relate to Bungay Common County Wildlife Site, also known as Outney Common, and areas of Priority Habitat. The plan identifies four additional green spaces of significance – Stow Fen, the Waveney Marshes, Skinners Meadow and Ollands Plantation. Note that these are not proposed as Local Green Spaces, but listed as important and should be considered in planning decisions. **Policy ENV3** in relation to landscape and ecological character sets out that new development will only be permitted where it does not have the potential to have an unacceptable impact on these areas. **Policy ENV4** requires sites of 5 houses or more to provide biodiversity net gain and **Policy ENV1** requires all new major new developments incorporate biodiversity corridors, greenways and green routes. Harm to Priority Habitats

should be avoided and effort taken to conserve and enhance them. It is clear that development will be supported where proposals have adequately considered any impact on natural capital and effort has been made to provide a net gain, linking with existing ecosystem services on site. The policy uses language that is slightly out of step with emerging national policy which refers to biodiversity net gain, rather than natural capital. This inconsistency could be addressed.

131. In terms of the site allocation east of St Margaret's Road, this lies adjacent an area of 'deciduous woodland' Priority Habitat. There are also trees and existing hedgerow along the site boundaries. These should be retained and there may be opportunity to enhance ecological connectivity with the adjacent deciduous woodland. This is reflected in proposed **Policy H4**, which sets out a requirement for existing natural features including trees and hedgerow to be retained and incorporated into the development, and for the development to include 1ha of open space for recreation / ecological enhancement. The policy could go further to require that efforts are taken to enhance ecological connectivity with nearby Priority Habitat.
132. **Policy TC&E1** is assessed as having potential long term negative impacts on biodiversity as it is supportive of tourist accommodation, which could include large-scale accommodation such as a hotel, outside of the development boundary. This could result in additional recreational pressure on local non-European designated sites of biodiversity interest, and where it is located outside of the development boundary, will likely reduce green open space and result in the fragmentation of ecological connectivity. The level of impact is uncertain as it depends on the proposals coming forward. It is recommended that further clarity to be provided in the policy in relation to the types of proposals that would be supported, with large scale hotel development not supported outside of the development boundary.
133. In relation to internationally designated biodiversity sites outside of the Plan area, the Habitats Regulations Assessment (HRA) produced for BNDP identifies impact pathways in relation to recreational pressure on the Broads Special Area of Conservation and Broadland Special Protection Area / Ramsar. The HRA concludes that BNDP would not lead to a significant increase in impacts from increased recreational pressure within any of the sites as the single site allocation, and any potential tourism accommodation, lie over 15km from the closest publicly accessible part of the SAC or SPA/Ramsar.
134. Overall it is considered that BNDP is likely to have a **minor long-term positive effect** on the biodiversity SEA theme.

Climate Change

135. The climate change SEA theme has the dual focus of reducing the contribution of the BNDP area to climate change and supporting resilience to the potential effects of climate change, including flooding. Suffolk County Council (and East Suffolk Council) have declared a climate emergency, with an ambition of making the county carbon neutral by 2030. The planning system has a crucial role to play in delivering effective action against this.

136. In relation to climate change mitigation, a key consideration is for the plan to support changes in travel patterns and a shift towards more sustainable travel options such as walking, cycling and public transport. The spatial strategy to allocate additional housing in Bungay is in line with the strategic direction of the Local Plan, which identifies Bungay as a sustainable location for modest housing growth. 6% of the Waveney area requirement overall is allocated in Bungay within the Local Plan. The proposed allocation east of St Margaret's Road is adjacent the Local Plan allocations, and will benefit from walking and cycle connections established as part of WLP5.2. This is a requirement set out in **Policy H4**, which also states that a new cycle route should be provided onto St Margaret's Road, and links should be made with a new Green Corridor which is described in more detail in **Policy ENV1**. The Green Corridor will be a new walking/cycleway linking the south-east of town to the centre, incorporating many underutilised or inaccessible areas of green space. It would act as a traffic free route open to all residents and presents an excellent opportunity to encourage walking and cycling from all of the new development taking place to the south-east of the town. This is further supported by the fact that the proposed development site adjoins the existing public rights of way network. Despite these improvements and the opportunity for sustainable travel, the allocation for 70 homes on the outskirts of the town will encourage greater car use and more vehicular trips into the town centre, having a negative impact on the objective of reducing the need to travel. **TM2** which allows for a new town centre car park also has the potential for a long-term negative impact on this objective.
137. A secondary consideration is the need to support delivery of low carbon infrastructure (eg ground source heat pumps, or solar PV with battery storage) and high standards of sustainable design and construction. This includes achieving net zero or at least CO² emissions standards that exceed the requirements of Building Regulations. **Policy H1** on design principles for new development sets a requirement that applications set out how design has maximised the potential to achieve net zero carbon emissions. This is required to apply to both open market and affordable housing. A development of 70 homes should provide economies of scale to achieve sustainable design and construction principles over and above that set by Building Regulations.
138. In relation to adaptation, a key consideration is existing and future flood risk. Fluvial flood risk follows the River Waveney and its tributaries. Areas surrounding the low-lying reach of the river are fairly flat, so the river spreads into an extensive flood plain during times of high flow when the river overtops its banks. The allocated site east of St Margaret's Road is located in Flood Zone 1 and there is very low risk of surface water flooding. **Policy ENV5** sets out that any flood prevention or mitigation measures will need to demonstrate an ecological gain, especially for aquatic biodiversity.
139. **Policy ENV1** on green corridors, and its supporting text recognise that green infrastructure can deliver a wide range of environmental benefits, to both people and wildlife. When considered in relation to climate change this position is well aligned with the NPPF, which highlights that well planned green infrastructure can help an area adapt to and manage the risks of climate change, including flood risk. Enabling green infrastructure provision with the BNDP area is therefore an important way in which the

plan can help promote climate change adaptation measures. In the supporting text the plan states that ‘tree planting can be a very effective measure in long-term carbon storage, when the right tree is planted in the right place’.

140. **Policy ENV2** requires that any new residential development providing open space will need to ensure it is designed to deliver significant gain in ecological value and habitat. Additionally, **Policy ENV4** on biodiversity sets out that new developments must avoid harming, conserve and enhance Priority Habitats, to strengthen their capacity to regulate climate.
141. It is recognised that by introducing additional dwellings **Policy H4** will increase the built footprint of the BNDP area, leading to additional emissions, and **Policy TM2** may also encourage a greater number of car trips. There will be opportunities to mitigate this through sustainable design and construction principles and here has been proactive planning (through new cycle/walking/greenways) to encourage sustainable travel. Overall BNDP provides good support for shifting towards more sustainable forms of local transport. Opportunities are also being sought to enhance green infrastructure and protect existing habitat features, which supports adaptation. On balance it is considered that BNDP will have a **minor long-term positive effect on climate change**.

Landscape

142. The landscape of the plan area overall is heavily influenced by the River Waveney and its location on the edge of the Broads, a landscape which is recognised for its exceptional beauty and uniqueness. Views across the Broads are possible from various locations along the ridgeline that runs to the south of the main west-east road through Bungay. Of particular note is the panoramic view from Angles Way near to Grove Farm. Growth is directed to the south of the town, away from the river and Broads landscape character, the location of which will not impact on the key view identified. The allocated site currently comprises greenfield land and development here will encroach upon the surrounding countryside. This area is identified within the East Suffolk Waveney Landscape Sensitivity Study⁹ as having low landscape sensitivity, low landscape value and high capacity for development. This is primarily because the setting contains few distinctive features resulting from the amalgamation of fields to facilitate more intensive arable farming. Intermittent tree cover also breaks up the views. With this in mind, the trees along the western edge of the site will make a contribution to the area’s overall landscape character, and should be retained. **Policy H4** reflects this and requires trees and hedgerows to be retained and incorporated into the development where possible. Additionally, it requires a landscape belt is provided along the southern edge of the site, which will help to create a buffer between the development and the wider countryside it abuts.
143. Within **Policy H1** the BNDP sets out a number of design principles for any new development. These are based on a Design Guide developed specifically for the plan and reflective of current characteristics and design components of the area, and essentially

⁹ <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/First-Draft-Local-Plan/Settlement-Fringe-Landscape-Sensitivity-Study.pdf>

requires new development to be in harmony with the existing built character and surrounding landscape. The policy includes a requirement that the edges of development will create a positive interface and reflect the character of its surroundings. Proposals must also allow for attractive views through and from any new development, especially out into the surrounding countryside, to be retained and not obscured.

144. **Policy EC&T1** allows for new tourist accommodation, including that which is located adjacent the development boundary. The policy could allow for a large hotel as it is unspecific in relation to the type of accommodation that would be supported. Without mitigation, a development of this nature has the potential to negatively impact on the character of the landscape.
145. Natural features, and sites of biodiversity importance, are considered to have a strong influence on the landscape character of the area, and this is reflected in the plan. **Policy ENV3** is concerned with landscape matters and sets out that new development will only be permitted where it does not have the potential to have unacceptable impact on the landscape character. Five sites of particular importance are listed, either for their landscape or biodiversity significance.
146. As set out above, there is a strong emphasis on promoting new green infrastructure within the BNDP. **Policy ENV1** seeks to establish a new green corridor, linking the south-east of the town where new development is allocated in both the BNDP and Local Plan, and the town centre.
147. Overall it is considered that the BNDP is likely to have a **neutral impact on the landscape theme**.

Water Resources, Soil and Land

148. The focus of this SEA theme is split into protecting and using water resources in a sustainable manner, and promoting efficient use of land.
149. The BNDP area is served by Essex and Suffolk Water, with Bungay falling into their Northern Central Water Resource Zone. Approximately 70% of the water supplied within this zone is sourced from surface water, the remainder from groundwater. The River Waveney is one source of the surface water. The Water Resource Management Plan analyses supply and demand, factoring in climate change, it concludes that given the supply surplus, no supply or demand schemes will be required. The growth outlined in BNDP does not significantly exceed that planned for the current Local Plans, and consulted upon with Essex and Suffolk Water.
150. Although not required in policy terms, reference is made to the benefits of Sustainable Drainage Systems in supporting text, and **ENV5** requires that any flood prevention or mitigation measures demonstrate an ecological gain. To enhance this, Sustainable Drainage Systems could be required in policy ENV5, unless it is demonstrated they are not technically feasible. WLP8.24 of the East Suffolk Waveney Local Plan also provides

mitigation in respect to this and BNDP is not expected to repeat policies that are covered in the Local Plan.

151. **Policies ENV1, ENV2, ENV3, ENV4 and ENV5** all support the protection and enhancement of habitats and biodiversity features which has implications for land management. This should support soil and water quality through supporting the ability of natural processes to dissipate pollutants.
152. The NPPF encourages the efficient use and re-use of land as it helps ensure that development is concentrated in the most sustainable locations where possible, rather than on greenfield sites. In Bungay this is important as the surrounding land is currently in farming use and its development could harm productive agricultural land. **Policy H4** allocates greenfield land that is identified as 'grade 3' quality. There has been no assessment to determine whether the land is grade 3a (classed as the best and most versatile) or 3b (not classed as the best and most versatile). Despite this, the site is in current agricultural use, and the loss of such resources to housing development is inevitably considered likely to lead to long-term minor effects.
153. The allocated site lies within a Minerals Consultation Area and Minerals Safeguarding Area as defined by Suffolk County Council. This requires any planning application to be supported by evidence which assesses the quality and quantity of sand and gravel resources on the site to judge whether these resources should be used during the development. **Policy H4** makes provision for this.
154. Overall whilst there remains an element of uncertainty in relation to the precise grade of agricultural land lost to development **minor long-term negative effects are anticipated**.

Historic Environment

155. The plan area has a rich variety of historic assets, including a Norman castle near the town centre, and many examples of Georgian buildings. There are 189 listed buildings, including four grade I and four grade II*, and three scheduled monuments, much of the town centre is designated a Conservation Area. Bungay Castle is on the Heritage At Risk Register, and although some work has taken place to repair the tower and gatehouse, further repairs and conservation work is needed.
156. The plan contains three key policies with respect to the historic environment. **Policy CH1** relates to the Conservation Area or proposals nearby that may affect its setting or significance. It requires development proposals to preserve or enhance the special character and appearance of the area in such a way that design is sympathetic and important views, trees and landscape features are retained. Proposals that bring buildings back into use or restore character, particularly where they contribute positively to town centre vitality are encouraged. **Policy CH2** relates specifically to a building of heritage significance that is currently derelict and promotes bringing it back into use, which will enhance the public realm within the town centre. Proactively seeking to enhance heritage features is likely to have a beneficial impact on the baseline and consideration should be

given to widening the policy to promote enhancement to other heritage assets, in particular Bungay Castle.

157. **Policy CH3** supports the conservation of locally important heritage features by requiring a heritage statement to be submitted in support of proposals affecting any designated or non-designated heritage assets. Further to this, **Policy H1**, seeks to ensure the design of new development retains and enhances the local character and historic distinctiveness of Bungay.
158. **Policy H4** allocates land east of St Margaret's Road, which is located in an area considered a remnant historic landscape owed to its former military use. The policy makes a requirement for any planning application to be supported by the results of a programme of archaeological evaluation, with any identified impacts to be mitigated. There is also a grade II listed farmhouse to the south of the site, which will also need to be considered as part of the application process, though impacts may be mitigated to some extent by the requirement for a landscape belt, as set out in **Policy H4**.
159. Overall it is considered that BNDP is likely to have a **long-term positive effect on the historic environment SEA theme**.

Population and Health

160. This SEA theme has a fairly broad scope, encompassing the delivery of small, affordable housing as well as promoting physical activity and access to green space, services and facilities.
161. By allocating a site for housing in addition to the East Suffolk Waveney Local Plan allocations, BNDP is proactively promoting development to meet local need. This will support an increase in the availability of affordable housing within the town, which was identified as a key need in the Housing Needs Assessment. In addition, **Policy H4** specifies a requirement for the new homes to be three-bedrooms or fewer (with any exceptions fully justified) to achieve a housing mix that meets local need. This is a significant positive.
162. In terms of active travel, **Policy H4** states that pedestrian and cycle routes should be provided that link with the allocated site (in the Local Plan) to the east, the new green corridor and a cycle route should also be provided onto St Margaret's Road. This will contribute towards encouraging active travel options between the development and key services directly to the north and in the town centre. This includes Bungay Leisure Centre, which is located to the north.
163. Promoting a green corridor (Bungay's first) through **Policy ENV1** is a significant positive in relation to encouraging active travel to the town centre. The corridor will act as a traffic free route for all residents, thus encouraging walking and cycling, particularly for more vulnerable road users. The corridor links existing green spaces and play areas, which will add to its functionality and attractiveness.

164. BNDP contains a number of community policies (**CM1 Community Hub, CM2 Bungay Medical Centre, CM3 Sports Facilities, CM4 Pre-school education and CM5 Community education**) which promote continuation or expansion of leisure, health and community facilities within the town. There is an emphasis on ensuring facilities are accessible, well connected to walking, cycling and public transport provision, and affordable.
165. Overall, BNDP is assessed as having a significant long-term **positive impact on the population and health theme.**

Accessibility and Transport

166. This element focuses on the provision of transport infrastructure and reducing the impact of traffic on the town centre. The pre-submission version of BNDP summarises a range of issues with respect to traffic and transport including insufficient parking at recent developments, a rise in inappropriate off-street parking, the number of HGVs travelling through the town centre and limited provision of cycle infrastructure.
167. **Policy TM5** requires new development takes every reasonable opportunity available to provide safe and convenient pedestrian and cycle access by:
- Extending connections to the existing pedestrian and cycle network and creating new safe networks;
 - Delivering cycle parking;
 - Taking opportunities to deliver the Waveney Cycle Strategy;
 - Creating permeable, connected, safe communities with links to amenities in the community and other residential areas;
 - Incorporating street design that facilitates low (20mph) traffic speeds in residential areas;
 - Supporting delivery of Green Corridors.
168. Additionally, **Policy H4** relating to the site allocation, specifies that pedestrian and cycle routes should be provided that link with the adjacent site allocation (in the Local Plan) and the Green Corridor going north to the town centre. A new cycle route to be provided onto St Margaret's Road, with safety features, is also specified.
169. **Policy H1** on design principles for new development goes beyond the provision of transport infrastructure, containing requirements in relation to shaping places for streets and pedestrians and cyclists. There is also a strong focus on incorporating green spaces, which are attractive for pedestrian and cyclists.
170. The policy approach is an appropriate response to mitigating some of the localised transport issues within the BNDP area, such as limited high-quality cycle infrastructure and busy roads. The requirement to extend existing walking and cycling routes will also support the integration of new development with the town centre and existing services.
171. **Policy TM1 and TM3** focus specifically on addressing parking issues relating to residents and visitors to the town centre. There is an emphasis on ensuring there is adequate off-street parking for all new development and within the town centre, to avoid

the negative impacts of unplanned on-street parking. **Policy TM1** on parking standards for new development explains *'the level of provision should be such that indiscriminate parking and the obstruction of footways and carriageways is avoided'*. **Policy TM3** supports additional off-street public car parking in the town centre where it can be demonstrated to meet demand, will not materially increase traffic in the Conservation Area, provides electric vehicle charging and is designed to minimise the impact of parked vehicles on the street-scene. In a town with established traffic concerns and limited on-road capacity for parking it is important that additional parking needs can be met adequately, however, this policy is likely to increase car trips into the town centre.

172. BNDP seeks to promote Bungay as a visitor destination and its policies reflect and seek to influence visitor travel patterns as well as residents. **Policy TC&E2** looks to guide the location of new tourist accommodation close to or well connected to the town centre. This is positive in terms of encouraging sustainable travel to services, and additional visitors would support local services and facilities.
173. There is particular local concern about the number of HGVs travelling through the town centre and there are two policies which specifically address this. As well as more generally, BNDP considers the impact of the construction phases of development on the volume of HGVs. **Policy TM4** requires that any Construction Management Plans or HGV routing agreements demonstrate that routes avoid the Conservation Area and town centre as much as reasonably possible. This is a useful mitigation measure. **Policy TC&E3** relates to employment growth and HGV traffic and encourages a shift to smaller goods vehicles. This sets out that proposals for facilities on existing or allocated employment sites that enable goods to be transferred from HGVs to smaller commercial vehicles will be supported, which is anticipated to have a minor positive impact.
174. **Policies CM1-5** are supportive of new/improved community facilities delivered in sustainable locations, with good walking and cycling access, thus promoting an enhancement in accessibility to services which is positive. However, new facilities will undoubtedly increase car journeys, despite opportunities for active travel, and the level of motorised traffic through the town centre.
175. Overall, **minor long-term negative effects** are anticipated as a result of growth to the south of the town centre. It is recognised there are additional policy provisions in BNDP which will support sustainable access to the town centre, particularly in relation to walking and cycling networks, though due to the layout of Bungay with the main road running through centre, this is unlikely to completely mitigate the impact of additional trips, many of which will still be by car. During the construction phase of development there is also likely to be an increase in HGV traffic, though this will be a short-term effect, and again it is recognised that BNDP has sought to mitigate this with policy provisions, where possible to do so.

Cumulative effects

176. Growth being delivered in the BNDP area, through the Local Plan, which allocates for employment and 485 new homes, and this Neighbourhood Plan, will have a cumulative

impact on the level of investment in sustainable transport infrastructure, including walking and cycling networks. In particular a concentration of growth in the same location provides a real opportunity to deliver improved infrastructure that links new and existing residential areas with key services, like the school and leisure centre, and the town centre. This will lead to **minor long-term positive effects** in relation to accessibility, population and health.

177. Set against this is the cumulative impact of growth, all to the south of the town centre, on the level of traffic through the town on the A144. This will be a long-term negative effect.
178. Cumulatively, designated heritage assets and their settings are likely to come under pressure from development, however, the policy provisions of the National Planning Policy Framework, Local Plans and BNDP are considered likely to ensure that any cumulative effects are not of significance.
179. Overall, the provisions of BNDP supplement the provisions of the Local Plans, to provide additional local protections for assets, features and characteristics of value, and identify opportunities for development to address known issues or deliver community benefits. As a result, overall **long-term positive cumulative effects are considered likely**.

Conclusions and recommendations

Conclusions

180. The following conclusions are drawn for each of the SEA themes:

SEA Theme	Conclusions
Biodiversity	There is a clear awareness throughout the BNDP of the importance of avoiding harm to Bungay's natural environment and the significance of this. A number of policies provide specific provisions to support the protection and enhancement of biodiversity, including retaining natural features, enhancing habitat connectivity and achieving a biodiversity benefit of features delivered through development – such as SuDS. Overall it is considered that BNDP will have a long-term positive impact on the biodiversity theme .
Climate change	There is a real focus in the plan on delivering improvements to sustainable travel infrastructure, particularly walking and cycling infrastructure, including a new 'green corridor' linking development in the south to the town centre. Balanced against this, the allocation for 70 new homes on the outskirts of the town and potential for a new car park will encourage more vehicular trips. Opportunity is taken to promote sustainable design and construction approaches for all new development, with a requirement to maximise the potential to achieve net zero carbon emissions. Overall it is considered that BNDP will have a long-term positive impact on the climate change theme .
Landscape	BNDP seeks to ensure that new development is sensitively designed to minimise any impacts on the landscape character of the area. This

SEA Theme	Conclusions
	includes the promotion of new green infrastructure that could enhance the area. Although the proposed allocation is to the south of the town, thus extending Bungay into the surrounding countryside, this area has been assessed as having low landscape sensitivity, and the allocation policy includes provision for a landscape barrier. The plan allows for new tourist accommodation, including that located adjacent the development boundary, which has the potential to impact on landscape character, depending on proposals coming forward. Overall BNDP is assessed as having neutral impacts on the landscape theme.
Water resources, soil and land	BNDP contains a range of mitigation policies with respect to water and land management which will serve to reduce the impact of future development. Despite this, the plan allocates greenfield land, currently used for agriculture, for 70 new homes. There is potential for this to be among the best and most versatile land in the country. Overall, long-term minor negative impacts on the water resource, soil and land are anticipated.
Historic environment	Bungay has a wealth of historic assets, which could be sensitive to future development. The plan contains a range of policies to support protection of such assets, including heritage features within close proximity of the site allocation. There is also provision to enhance a particular asset of community importance within the town centre. Overall BNDP is assessed as having long-term minor positive impacts on the heritage theme.
Population and health	The delivery of housing, and its targeted mix to meet community need, is a significant positive of BNDP. Additionally, the plan contains a range of policies to improve walking and cycling infrastructure, which will in turn promote active travel within the town. BNDP also promotes the continued expansion of leisure, health and community facilities, with a focus on physical activity and healthcare. Overall BNDP is assessed as having long-term significant positive impacts on the population and health theme.
Accessibility and transport	The plan promotes improvements to sustainable transport infrastructure, which will support achievement of a modal shift within the town. This will help to reduce the number of new car trips associated with the planned development, though given the geography of Bungay, with the A144 running through the town centre, it is likely that development will give rise to an increase in vehicular traffic through the centre. Overall BNDP is assessed as having long-term minor negative impacts on the accessibility and transport theme.

Recommendations

181. The appraisal of the draft BNDP has identified the following recommended mitigations which seek to minimise the potential for negative effects and maximise the potential for positive effects in relation to the relevant SEA themes:

- **Biodiversity:** it is recommended that language in policy **ENV1** is amended to achieve greater consistency with emerging national policy with refers to biodiversity net gain, rather than natural capital.
- **Biodiversity & Landscape:** it is recommended that further clarity to be provided in policy **TC&E2** in relation to the types of proposals that would be supported, with large scale hotel development not supported outside of the development boundary.
- **Climate Change:** to mitigate against an increase in emissions as a result of housing development planned through BNDP opportunities should be taken to ensure sustainable design and construction principles are used and there has been proactive planning (through new cycle/walking/greenways) to encourage sustainable travel. It is recommended this is incorporated into policy **H1** and **TM4** on design.
- **Water resources, soil and land:** to enhance **ENV5** it is recommended that Sustainable Drainage Systems are required unless it can be demonstrated that they are not technically feasible.
- **Historic environment:** it is recommended that consideration is given to widening the policy framework to promote enhancement to other heritage assets (in addition to the King's Head), in particular Bungay Castle which is on the Heritage At Risk Register.

182. Each of these recommended mitigation measures have been incorporated into the submission version of the BNDP.

Part 3: What are the next steps

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

Plan Finalisation

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

185. If the examination leads to a favourable outcome, BNDP will be subject to a referendum, organised by the Local Planning Authority. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once 'made' BNDP will become part of the development framework for East Suffolk and the Broads Authority, covering the defined Neighbourhood Plan area.

Monitoring

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

187. There are no significant negative effects identified through this SEA. It is anticipated that monitoring of effects of BNDP will be undertaken by East Suffolk and the Broads Authority, as part of the process of preparing their Annual Monitoring Reports. No additional monitoring measures have been identified at this stage.

Appendices

Appendix A: Regulatory Requirements

Schedule 2 of the Environmental Assessment of Plans and Regulations 2004 (the Regulations) sets out the information that must be contained in the Environmental Report. Interpretation of this however is not straightforward.

Figure AA1 provides an interpretation of Schedule 2 requirements, linking it to the structure of this Environmental Report.

Figure AA2 sets out how this SEA meets the quality assurance checklist for development of SEA based on the guidance set out in A Practical Guide to the Strategic Environmental Assessment Directive (2005)¹⁰. This checklist is intended to help test whether the requirements of the SEA Directive are met, identifying any problems in the Environmental Report and show how effectively the SEA has integrated environmental considerations into the plan-making process.

¹⁰ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf

Figure AA1: Structure of this report in relation to the regulatory requirements

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

Figure AA2: Quality Assurance Checklist

Checklist	How/where requirement met
<p>Objectives and context</p> <ul style="list-style-type: none"> • The plan’s purpose and objectives are made clear • Environmental issues and constraints are considered in developing objectives and targets • SEA objectives are clearly set out and linked to indicators and targets • Links with other related plans, programmes and policies are identified and explained • Conflicts that exist between SEA objectives, SEA and plan objectives and between SEA objectives and other plan objectives are identified and described 	<p>This is set out in the introduction of the Environmental Report. The detail of the SEA framework is provided in Figure 2 of this report.</p>
<p>Scoping</p> <ul style="list-style-type: none"> • Consultation Bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Environmental Report • The assessment focuses on specific issues • Technical, procedural and other difficulties are discussed; assumptions and uncertainties are made explicit • Reasons are given for eliminating issues from further consideration 	<p>Each of the statutory environmental bodies were consulted on the Scoping Report via email 22 April to 27 May, which meets the 5 week consultation period. A response was received from each of the environmental bodies. These are set out in detail in Appendix B of this Environmental Report. Appendix B contains the revised Scoping, taking into account comments received. The Air Quality theme was eliminated at the scoping stage, the reason for this is given in Appendix B.</p>
<p>Alternatives</p> <ul style="list-style-type: none"> • Realistic alternatives are considered for key issues, and the reasons for choosing them are documented • Alternatives include do minimum or business as usual scenarios wherever relevant • The environmental effects of each alternative are identified and compared 	<p>Given that housing growth is a key concern of local residents and the delivery of new homes is most likely to have a significant effect compared to other proposals within the plan, work on reasonable alternatives through this SEA has focused on different options for delivering the housing requirement. Assessment against the SEA framework of two alternative options in is given in Part 1 of this report.</p>

Checklist	How/where requirement met
<ul style="list-style-type: none"> Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained Reasons are given for selection or elimination of alternatives 	The reasons for selecting one of the options are detailed in Part 1 under 'developing a preferred approach'.
<p>Baseline information</p> <ul style="list-style-type: none"> Relevant aspects of the current state of the environment and their likely evolution without the plan or programme are described. Environmental characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan. Difficulties such as deficiencies in information or methods are explained. 	Baseline information for each of the themes is provided in the scoping, set out in Appendix B of this report.
<p>Prediction and evaluation of likely significant environmental effects</p> <ul style="list-style-type: none"> Effects identified include the types listed in the Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant; other likely environmental effects are also covered, as appropriate. Both positive and negative effects are considered, and the duration of effects (short, medium or long-term) is addressed. Likely secondary, cumulative and synergistic effects are identified where practicable. Inter-relationships between effects are considered where practicable. The prediction and evaluation of effects makes use of relevant accepted standards, regulations, and thresholds. Methods used to evaluate the effects are described. 	An appraisal of the current version of the BNDP under the SEA theme headings established through scoping is provided in Part 2 of this report. For or each theme 'significant effects' of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 1 of the Regulations. For example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, such as the potential for BNDP to impact on an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the assessment as appropriate. Every effort is made to evaluate effects accurately; however, this is inherently challenging given the high-level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications.

Checklist	How/where requirement met
<p>Mitigation measures</p> <ul style="list-style-type: none"> • Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan or programme are indicated. • Issues to be taken into account in project consents are identified. 	<p>Mitigation measures are noted through the assessment in Part 2 of this report, and also identified in the 'Recommendations' at the end of Part 2.</p>
<p>The Environmental Report</p> <ul style="list-style-type: none"> • Is clear and concise in its layout and presentation. • Uses simple, clear language and avoids or explains technical terms. • Uses maps and other illustrations where appropriate. • Explains the methodology used. • Explains who was consulted and what methods of consultation were used. • Identifies sources of information, including expert judgement and matters of opinion. • Contains a non-technical summary covering the overall approach to the SEA, the objectives of the plan, the main options considered, and any changes to the plan resulting from the SEA. 	<p>A non-technical summary is provided at the beginning of this Environmental Report.</p>
<p>Consultation</p> <ul style="list-style-type: none"> • The SEA is consulted on as an integral part of the plan-making process. • Consultation Bodies and the public likely to be affected by, or having an interest in, the plan or programme are consulted in ways and at times which give them an early and effective opportunity within appropriate timeframes to express their opinions on the draft plan and Environmental Report. 	<p>This is covered in Part 3 in relation to 'next steps'.</p>
<p>Decision-making and information on the decision</p>	<p>This is covered in Part 3 of this Environmental Report</p>

Checklist	How/where requirement met
<ul style="list-style-type: none"> • The environmental report and the opinions of those consulted are taken into account in finalising and adopting the plan or programme. • An explanation is given of how they have been taken into account. • Reasons are given for choosing the plan or programme as adopted, in the light of other reasonable alternatives considered. 	
<p>Monitoring measures</p> <ul style="list-style-type: none"> • Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SEA. • Monitoring is used, where appropriate, during implementation of the plan or programme to make good deficiencies in baseline information in the SEA. • Monitoring enables unforeseen adverse effects to be identified at an early stage. (These effects may include predictions which prove to be incorrect.) • Proposals are made for action in response to significant adverse effects. 	Monitoring of this SEA is set out in Part 3 of this Environmental Report.

Appendix B: Scoping Information

This appendix presents the baseline information and policy review that has informed the identification of key issues and SEA objectives as presented in the **Introduction Section and Figure 2** of the Environmental Report.

It was established at scoping that for the purposes of this SEA, the air quality theme has been scoped out of the proposed framework. The reason for this is that air quality is generally good within the BNDP area as it is across East Suffolk as a whole. Annual monitoring demonstrates that levels of NO₂, the main pollutant of concern, are well below the national objective.

Scoping consultation was undertaken for five weeks 22 April to 27 May. The responses received are identified in below.

Scoping Consultation Response	Update to SEA / Response
<p>Environment Agency – Natalie Kermath, Planning Advisor</p> <ul style="list-style-type: none"> The Scoping Report refers to fluvial flood risk in sections 56 and 64. We believe there should be a reference to the Strategic Flood Risk Assessment for the Local Planning Authority. We also note reference to climate change and the effect this will have on fluvial flood risk zones, this should be reviewed in conjunction with the SFRA to view the impacts in more detail. We are pleased to see reference to development being sequentially sited outside of Flood Zones 2 and 3. 	<p>Reference to the SFRA added</p> <p>Reference added</p> <p>Thank you, noted.</p>
<p>Historic England – Edward James, Historic Places Advisor</p> <ul style="list-style-type: none"> Link provided to the advice in <i>Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment</i> which sets out the historic environmental factors which need to be considered Link provided to <i>Historic England Advice Note 3: Site Allocations and Local Plan</i> with the expectation that this methodology is undertaken for any site allocation where there is a potential impact Pleased to note that the Scoping Report contains reference to a comprehensive evidence base. Recommend that enhancements to Bungay Castle are strongly considered as part of development of the neighbourhood plan and its policies. 	<p>Thank you, also now added to the policy context for the historic environment theme</p> <p>Thank you, methodology considered when undertaken assessment of reasonable alternatives</p> <p>Thank you. Reference to Bungay Castle is made in one of the recommendations of this SEA.</p>

<ul style="list-style-type: none"> Historic England strongly advises that the conservation and archaeological staff of the relevant local planning authorities are involved closely in development of the plan and its assessment. 	Noted, thank you.
<p>Natural England – Dawn Kinrade, Consultations Team</p> <ul style="list-style-type: none"> Natural England has no specific comments to make on this neighbourhood plan SEA scoping. 	Thank you.

Biodiversity

Policy Context

National Planning Policy Framework (2019)¹¹: Emphasis is on conserving and enhancing the natural environment, minimising impacts on and providing net gains for biodiversity through development. Designated sites, important habitats and species are afforded significant protection – with plans expected to take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure.

A Green Future: Our 25 Year Plan to Improve the (2018)¹²: This sets out a vision to help the natural world regain and retain good health, aiming to deliver cleaner air and water, protect threatened species and provide richer wildlife habitats. Emphasis is on enhancing biodiversity rather than just protecting it.

Environment Bill (2020)¹³: The emerging Environment Bill is a significant piece of legislation that will provide further provisions for biodiversity when it achieves royal assent. It sets a mandatory net gain approach, with a minimum of 10% biodiversity net gain required for planning applications. It also sets out the establishment of local nature recovery strategies to support habitat recovery and identify local priorities. These could be used to help target net gain.

Suffolk’s Nature Strategy (2015)¹⁴: This sets recommendations and priority actions in relation to nature conservation and enhancement, split by the natural environment, economic growth and health and wellbeing. These cut across protected sites, climate change, landscapes, habitats and species, green spaces, water management and education. Recommendation 10 relates to neighbourhood plans, identifying these as an opportunity to develop local of ecological networks.

East Suffolk Council Waveney Local Plan (2019)¹⁵: Policy WLP8.34 on Biodiversity and Geodiversity sets out that development should maintain, restore or enhance green

¹¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

¹²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

¹³<https://publications.parliament.uk/pa/bills/cbill/58-01/0220/200220.pdf>

¹⁴<https://www.suffolk.gov.uk/assets/planning-waste-and-environment/suffolks-countryside-and-wildlife/Suffolks-Nature-Strategy-2015.pdf>

¹⁵<https://www.eastsuffolk.gov.uk/assets/Your-Council/WDC-Council-Meetings/2019/March/Council-20-03-19/Item-11-APPENDIX-A-Waveney-Local-Plan.pdf>

infrastructure networks. Sites of local importance including County Wildlife Sites, priority habitat and species are afforded protection.

Local Plan for the Broads (2019)¹⁶: This requires development to protect the value and integrity of designated sites and demonstrate biodiversity gains, paying particular attention to ecological networks and habitat corridors. There is also emphasis on linking fragmented habitats of high wildlife value.

Waveney Green Infrastructure Strategy (2015)¹⁷: This sets a strategic approach to improve the green spaces and connections between them to the benefit of communities, wildlife and the wider environment. Key recommendations for Bungay include ensuring open spaces do not become isolated through new development and improving management of green spaces to encourage greater biodiversity value.

Baseline Review

There are no internationally or nationally designated wildlife sites within the BNDP area. The nearest Natura 2000¹⁸ sites are **The Broads Special Area of Conservation (SAC) and Broadland Special Protection Area (SPA)/Ramsar**, around 4.5km to the south east. The multiple designations indicate the high values associated with the site, in terms of supporting biodiversity. BNDP has been screened in for Appropriate Assessment under the Habitats Directive due to potential for recreational disturbance at protected Habitat Sites, including the Broads SAC and Broadland SPA/Ramsar.

The **Broadland SPA/Ramsar** comprises a low-lying wetland straddling the border between east Norfolk and northern Suffolk. It is a floodplain of five river systems including the Bure, Yare and Waveney and their major tributaries. The area represents one of the highest quality marshland complexes in the UK with a mosaic of wetland habitats, including open water, reedbeds, carr woodland, grazing marsh, tall herb fen, transition mire and fen meadow. In turn this wetland complex sustains an internationally important assemblage of breeding and non-breeding raptors and waterbirds. Both breeding and non-breeding bird features spend time on feeding areas outside the designated site boundary.

The Broads SAC is a 5,889ha site in East Anglia comprising humid grassland (39%), broad-leave deciduous woodland (24%), bogs and marshes (19%) and inland water bodies (16%). It constitutes a variety of sensitive habitats, most of which are dependent on a consistent hydrological input. The SAC contains oligo-mesotrophic waters with Chara species. These waters are characterised by very clear water and a low nutrient content. They are also base-rich (generally calcium) and are usually confined to underlying areas of limestone. The Broads are the richest site for charophytes in Britain with a total of 20 recorded species. The Broads SAC also supports the largest occurrence of calcareous fens outside of Sweden.

There are a number of **nationally designated** Sites of Special Scientific Interest within close proximity of the BNDP area. This includes Abbey Wood, Flixton; Sexton Wood; Tindall

¹⁶ https://www.broads-authority.gov.uk/_data/assets/pdf_file/0036/259596/Local-Plan-for-the-Broads.pdf

¹⁷ <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Green-Infrastructure-Strategy.pdf>

¹⁸ Natura 2000 or N2K sites include Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites.

Wood, Ditchingham; and Broome Pit Heath, each of which are around 2km from the area. See **Figures AB1 and 2**.

Nationally designated **Abbey Wood, Flixton SSSI** is an 18ha site south-west of Bungay. It consists of two adjoining areas, the larger Abbey Wood to the north and the smaller Packway Wood to the south. This ancient woodland is managed as coppice with standards. Common trees include hazel, hornbeam and oak. The flora are diverse with dog's mercury dominant, and there is one rare species, thin-spiked wood sedge. The site is on private land with no public access. Around half of the site is in a 'favourable' or 'unfavourable – recovering' condition, the remaining 'unfavourable – no change' condition¹⁹.

Sexton Wood SSSI is a 40-hectare (99-acre) biological Site of Special Scientific Interest north-west of Ditchingham in Norfolk. It is a Nature Conservation Review site, Grade 2. This ancient wood on boulder clay is mainly coppice with standards, but there are some areas of high forest. The ground flora is diverse, with dog's mercury dominant and other plants such as ransoms and early-purple orchid. The wood is private property with no public access. The whole area is in an 'unfavourable – recovering' condition²⁰.

The 41ha **Tindall Wood SSSI** is one of the largest hornbeam woods in the county and is considered representative of the type. It is an ancient woodland situated on poorly drained south Norfolk boulder clay which is overlain in places by sandy loam. Surrounded by a massive woodbank and ditch, the wood mainly supports Hornbeam and Oak with Ash, Maple and Hazel. Several uncommon species are found in the ground flora which indicate that the woodland may be primary. The whole area is in an 'unfavourable – recovering' condition²¹.

Broome Heath Pit SSSI contains the only remaining exposures in the Broome Terrace. This 5.63ha site is an old river terrace which has a surface about 3m above the flood plain of the modern River Waveney. The pit exposes silt lenses within a sand and gravel sequence indicating a depositional environment of a braided river channel with a backwater areas. Other features within the section include perecontemporaneous ice wedge casts and cryoturbation, indicating subglacial depositional conditions. The site is in an 'unfavourable – no change' condition²².

Bungay Common County Wildlife Site, also known as Outney Common, is a formal but non-statutory designated site that extends over 160ha. It is naturally divided into the Lows, which forms about half of the area and comprises low lying grazing land bordering the River Waveney. The Hards make up the remaining half and are higher ground in the centre which contains an 18 hole Golf Course.

Impact Risk Zones (IRZs) have been identified in the areas surrounding the designated SSSIs. There are seven IRZs that cover the entire BNDP area. Their review in accordance with

¹⁹ Natural England (2021) Designated Sites Viewer (online) available at: <https://designatedsites.naturalengland.org.uk/SiteSearch.aspx>

²⁰ Ibid

²¹ Ibid

²² Ibid

Natural England guidance²³ indicates that residential development is not an identified trigger for impacts which requires further consultation with Natural England. This indicates that residential development which may come forward as part of BNDP is unlikely to pose a risk to the SSSIs.

Directly adjacent the BNDP area to the north lies **Bath Hills Local Nature Reserve (LNR)**. The 12ha site is on the sheltered south side of a steep valley. It has an abundance of spring flowers which bloom early as a result of its position.

The Waveney River Valley provides a range of **Priority Habitats** that support biodiversity around the northern fringes of the town. This includes:

- Deciduous woodland;
- Coastal and floodplain grazing marsh; and
- Good quality semi-improved grassland.

Public access to these areas is limited and ecological connectivity is good. More fragmented deciduous woodland also exists to the south-west of the town. Within the built-up area there are limited areas of priority habitat or green space more generally, and connectivity between them is poor.

An area along the north-eastern border of the BNDP area contains areas identified as part of a **Habitat Network Expansion / Enhancement Zone** and also an area classified as **Restorable Habitat**. This is land within close proximity to the existing habitat components that are likely to be suitable for habitat re-creation, or where other types of habitat may be created²⁴.

Future Baseline

The National Planning Policy Framework and Local Plan policy will continue to afford protection to all designated sites. Locally designated sites and priority habitats are those most likely to come under pressure from future development in the BNDP area. BNDP also provides an opportunity to ensure that growth delivered over the plan period minimises its impact on habitat and delivers enhancement. This includes through the creation of green corridors, improved connectivity between green spaces and encouraging community action in relation to habitat creation or enhancement.

Key Issues

Development coming forward as part of BNDP should consider likely additional recreational impacts, and plan for good access to open and green spaces that will reduce recreational pressure on nearby designated sites.

²³ Natural England (2020) Natural England's Impact Risk Zones for Sites of Special Scientific Interest - https://magic.defra.gov.uk/Metadata_for_magic/SSSI%20IRZ%20User%20Guidance%20MAGIC.pdf

²⁴ Natural England, 2020, Natural Habitat Network Maps https://s3-eu-west-1.amazonaws.com/data.defra.gov.uk/Natural_England/Habitat_Species/Habitats/Habitat_Network_England_NE/Habitat_Networks_England_Version_2_Guidance.pdf

The nationally designated SSSIs nearby to the BNDP area are mostly woodland, with some of these currently closed to the public. There is potential that development will result in increased recreational disturbance to those which are open to the public.

Priority Habitat can be sensitive to development, and growth which comes forward as part of BNDP should seek to avoid the loss or fragmentation of this. As described above, some of this is already quite fragmented, in the southern part of the BNDP area. There is an opportunity for BNDP to include site specific mitigation or habitat enhancement requirements in relation to allocated sites. Where appropriate this could be informed through the Habitat Network Enhancement Zones identified.

Within the built-up area of Bungay there are limited green spaces or connectivity between them and few areas that are important for natural flora and fauna. It is important to ensure that existing green spaces, such as the old burial ground on Hillside Road West, are not at risk of becoming isolated through new development.

Figure AB1: Biodiversity Designations in the BNDP area

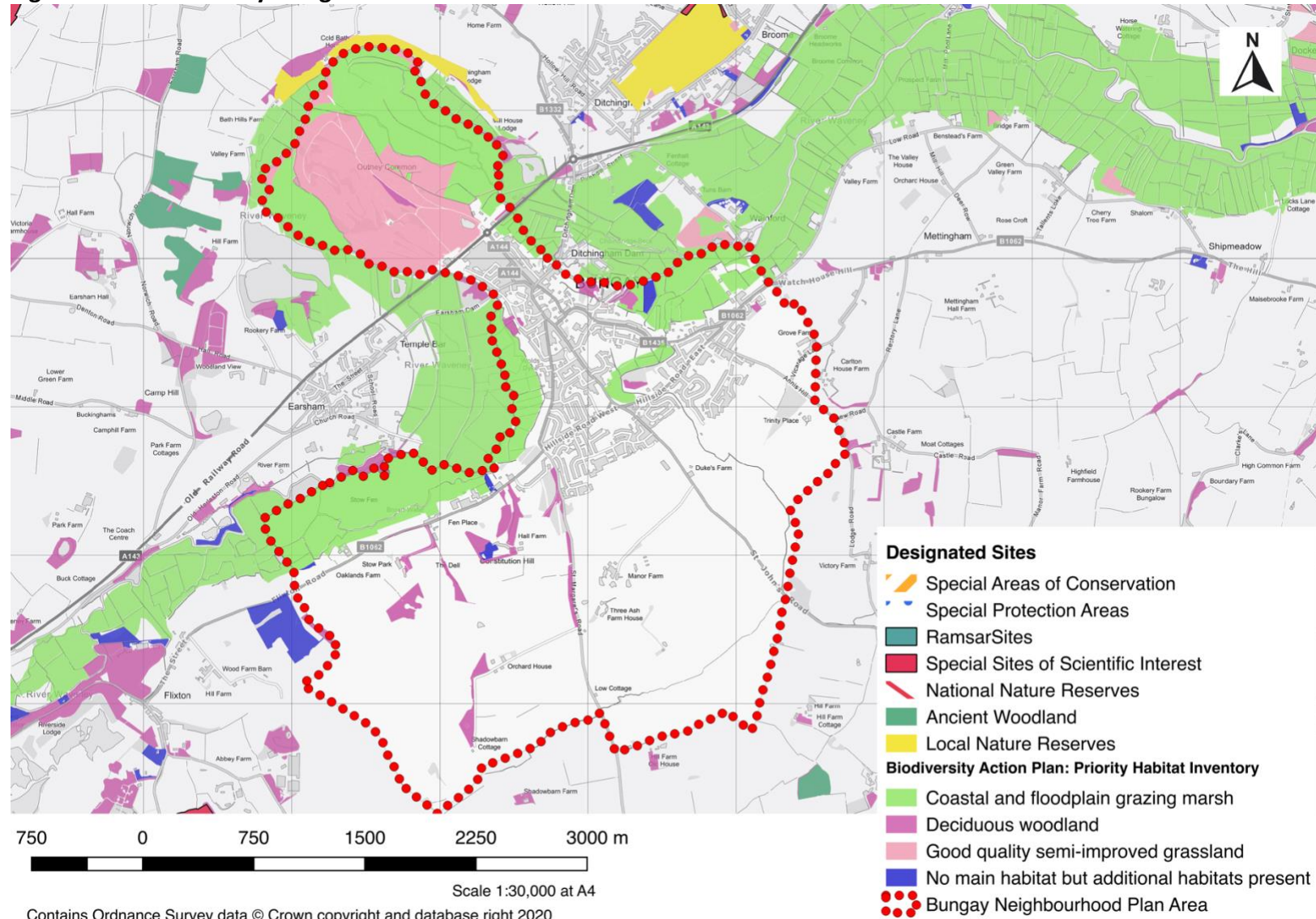
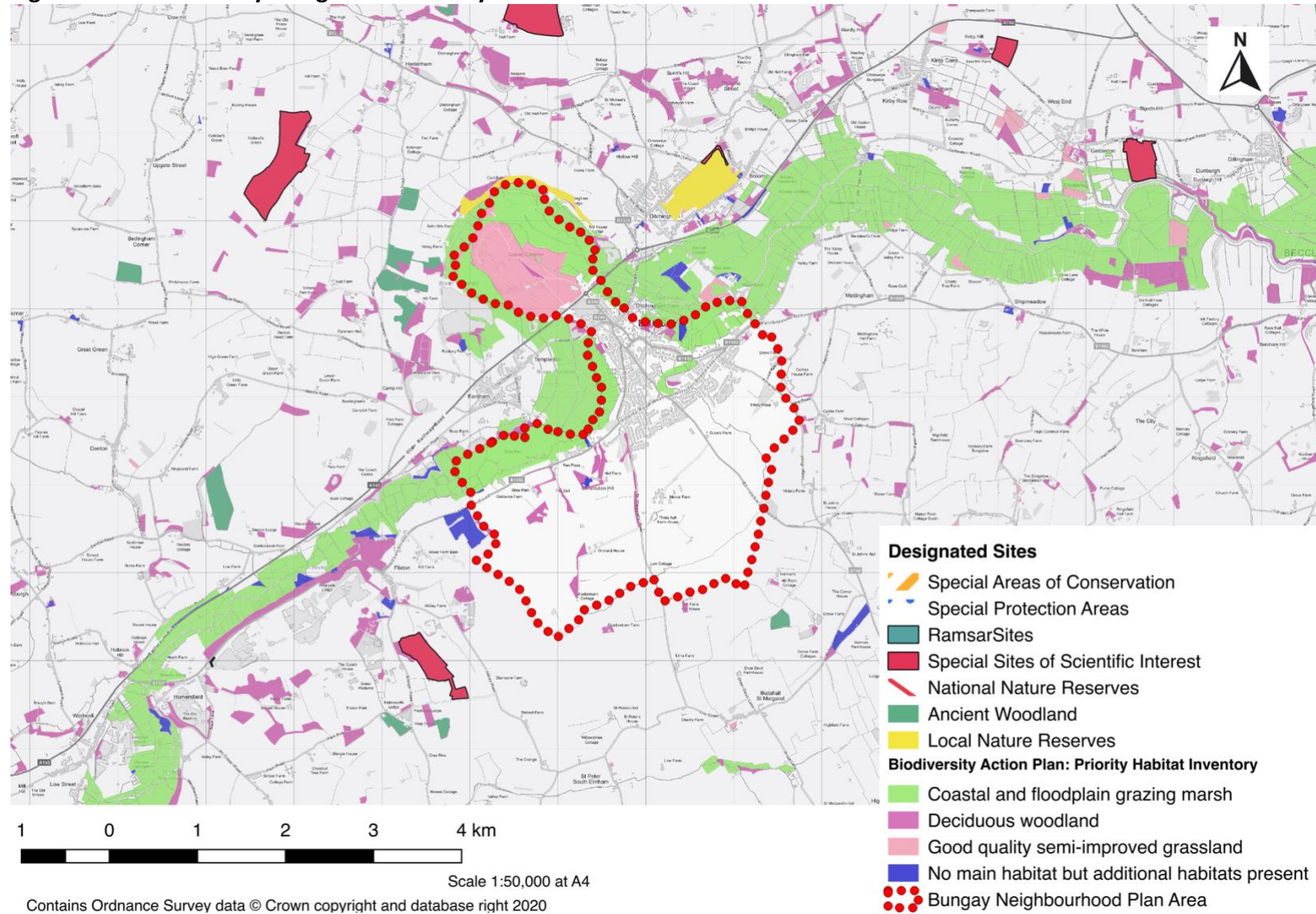


Figure AB2: Biodiversity Designations nearby the BNDP area



Air Quality

Policy Context

National Planning Policy Framework (2019)²⁵: This requires compliance with relevant limit values or national objectives for pollutants, considering the presence of Air Quality Management Areas and Clean Air Zones. Additionally, opportunities to improve air quality or mitigate impacts are promoted through delivery of sustainable development, travel management and green infrastructure provision.

Clean Air Strategy (2019)²⁶: This sets a framework for action to tackle air pollution, making our air healthier to breathe, protecting nature and boosting the economy. It includes a shift away from just tackling the biggest individual sources of air pollution to addressing smaller and more diffuse sources.

UK Plan for tackling roadside nitrogen dioxide concentrations (2017)²⁷ This outlines a £2.7bn investment in air quality and cleaner transport, including investment in ultra-low emission vehicles, cleaner bus technology, walking and cycling infrastructure and improving air quality on trunk roads.

East Suffolk Council Air Quality Annual Status Report (2020)²⁸ This sets out key measures undertaken to improve air quality across the district, and in particular in the two Air Quality Management Areas declared for exceeding nitrogen dioxide targets in the past. Neither of these are in or nearby to the BNDP area and recent monitoring results (for 2019) show no exceedances across the district.

East Suffolk Council Waveney Local Plan (2019)²⁹: Some specific air quality issues are identified in relation to site allocations, though not those which fall within the BNDP area.

Local Plan for the Broads (2019)³⁰: Clean air is identified as a natural ecosystem service alongside water regulation, carbon storage and flood regulation. Requirement to consider air pollution, particularly with respect to traffic impacts, is made in several of the allocation policies, none of which are within the BNDP area.

Baseline

The East Suffolk Council Air Quality Annual Status Report confirms that there are no Air Quality Management Areas in or nearby to the BNDP area. This would suggest that air quality is generally not of a concern, and indeed the report confirms that air quality within East Suffolk is good.

²⁵https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

²⁶ <https://www.gov.uk/government/publications/clean-air-strategy-2019>

²⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-plan-overview.pdf

²⁸ <https://www.eastsuffolk.gov.uk/assets/Environment/Environmental-Protection/Air-Quality/East-Suffolk-Council-ASR-2020.pdf>

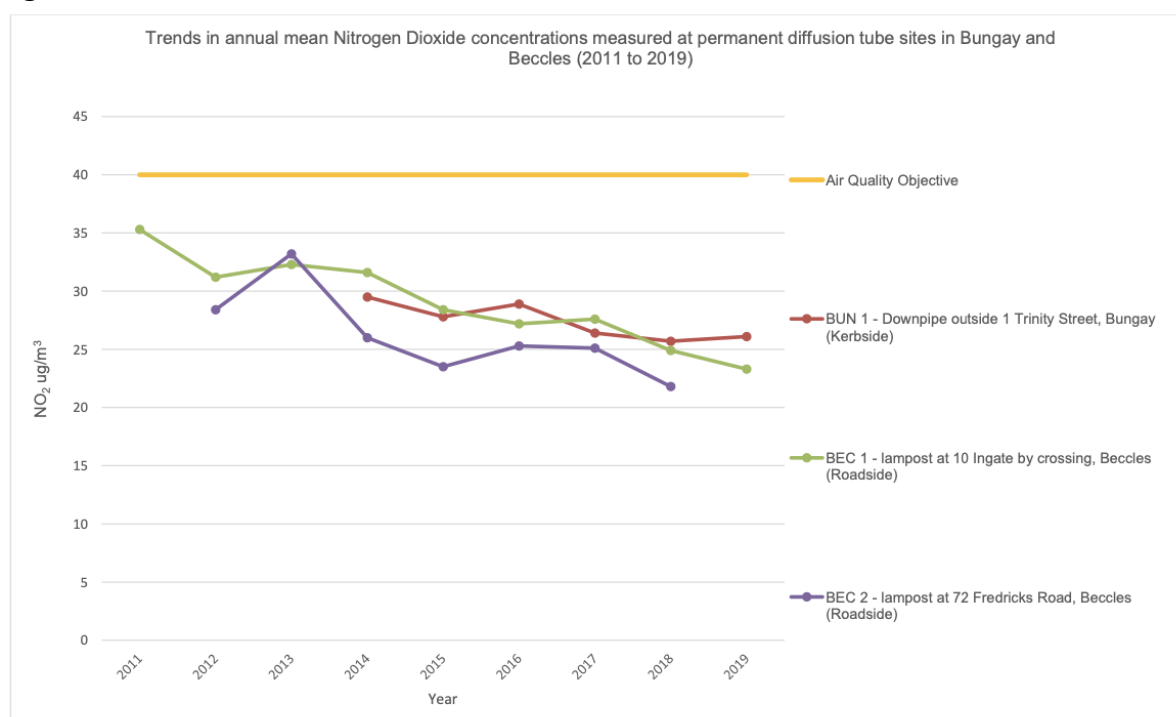
²⁹ <https://www.eastsuffolk.gov.uk/assets/Your-Council/WDC-Council-Meetings/2019/March/Council-20-03-19/Item-11-APPENDIX-A-Waveney-Local-Plan.pdf>

³⁰ https://www.broads-authority.gov.uk/data/assets/pdf_file/0036/259596/Local-Plan-for-the-Broads.pdf

The main source of emissions within East Suffolk is road traffic, which means that the pollutants of concern are nitrogen dioxide (NO₂) and particulate matter. There are 74 diffusion tube monitoring locations covering 18 areas across the district, including Bungay. No exceedances in NO₂ were observed in 2019 and data indicates that NO₂ concentrations have remained static in Bungay over the last 3 years, see **Figure 8**.

Transport emissions are the main source of NO₂ emissions and areas of congestion can give rise to concentrations of emissions. Congestion is of most concern locally within the medieval town centre, particularly in close proximity to the schools. HGVs and traffic congestion at pick up and drop off times could exacerbate air quality issues.

Figure 8: Trends in annual NO₂ concentrations



Source: *East Suffolk Local Air Quality Management Annual Status Report 2020*

Future Baseline

There is much investment taking place in promoting sustainable travel options and further opportunity to create local impact within respect to this and other measures locally through the BNDP, which may have positive impacts on local air quality. However, future housing development will likely result in higher levels of road traffic, which could give rise to congestion in the town centre or outside key services, increasing levels of NO₂.

Key Issues

Air quality is generally good within the BNDP area as it is across East Suffolk as a whole. Annual monitoring demonstrates that levels of NO₂, the main pollutant of concern, are well below the national objective. Vehicle emissions are a key cause of NO₂, and therefore in areas of congestion often have higher levels of pollutants. As the A144 runs through Bungay town centre, road traffic congestion is of period concern. New growth in the vicinity of this has the potential to increase traffic and result in poorer air quality, though as there are no

air quality issues at present this is not a likely significant impact. Some of these issues are explored in the accessibility and transport and population and health themes.

In the absence of any specific air quality issues (AQMA or areas known to exceed national objectives for air quality) the air quality theme has been scoped out for the purposes of this SEA.

Climate Change

Policy Context

National Planning Policy Framework (2019)³¹: This requires proactive planning to mitigate and adapt to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts. Inappropriate development in areas of high risk from flooding should be avoided. The local authority's Strategic Flood Risk Assessment should be the primary source of flood risk information.

Neighbourhood Planning in a Climate Emergency (2020)³²: This is a guide for developing a neighbourhood plan which focuses on dealing with climate change and its implications. It is structured across the key themes of renewable energy; sustainable buildings; sustainable transport; flooding, extreme weather and water conservation; green infrastructure and biodiversity; transitioning to a low carbon economy and service provision.

UK Climate Change Act (2008)³³: This establishes a framework to develop an economically credible emissions reduction path and contribute towards action to tackle climate change under the Kyoto Protocol and UN-led Paris Agreement.

The Clean Air Strategy (2019)³⁴: This sets out government plans for dealing with all sources of air pollution. It complements the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan.

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

Suffolk Climate Emergency Plan (2020)³⁶: This sets out an ambition to achieve carbon neutrality by 2030. Actions are required across a range of sectors including housing, transport, energy and business.

³¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

³²<https://neighbourhoodplanning.org/toolkits-and-guidance/how-to-write-a-neighbourhood-plan-in-a-climate-emergency/>

³³<https://www.legislation.gov.uk/ukpga/2008/27/contents>

³⁴<https://www.gov.uk/government/publications/clean-air-strategy-2019>

³⁵https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf

³⁶<http://www.greensuffolk.org/assets/Greenest-County/SCCP/SCCP/Misc/2020-06-01-REE-SCEP-Technical-Report-FINAL.pdf>

East Suffolk Council Waveney Local Plan (2019)³⁷: This contains a range of policies relating to climate change including in relation to flood risk, coastal change, renewal and low carbon energy and sustainable construction.

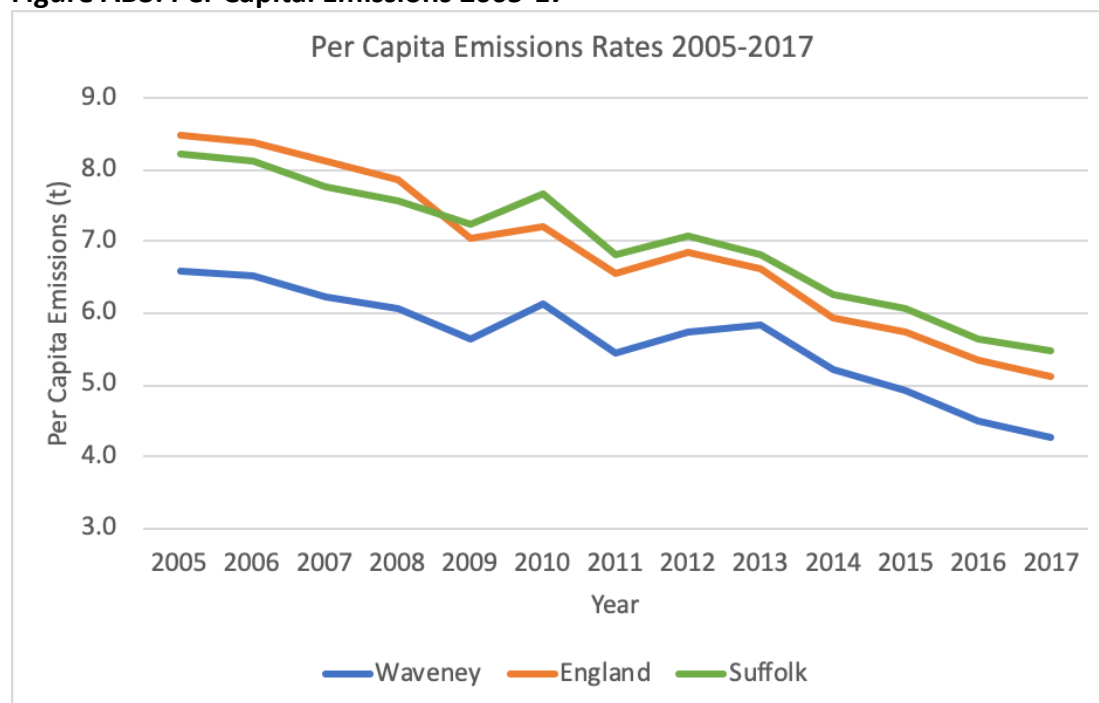
Local Plan for the Broads (2019)³⁸: This welcomes positive action from development which enable a move towards a low carbon economy and society and helps biodiversity adapt to climate change. Efforts to mitigate, adapt and increase resilience to climate change are required. The plan also includes a climate-smart planning cycle and climate-smart checklist for developers.

Baseline Review

In 2019 Suffolk County Council declared a climate emergency, committing to achieve carbon neutrality by 2030. The Suffolk Climate Emergency Plan makes a commitment for all Suffolk councils to reduce their own carbon emissions and work together to reduce carbon emissions.

UK local authority carbon dioxide emissions estimates for 2017 (published June 2019) presents the latest estimates of end-user carbon dioxide (CO₂) emissions for local authority areas³⁹. Between 2016 and 2017, CO₂ emissions decreased across the UK and in East Suffolk/Waveney. **Figure AB3** illustrates the declining trend in per capita emission rates over the twelve-year period from 2005 to 2017. Rates in Waveney are lower than the averages across Suffolk and England.

Figure AB3: Per Capital Emissions 2005-17



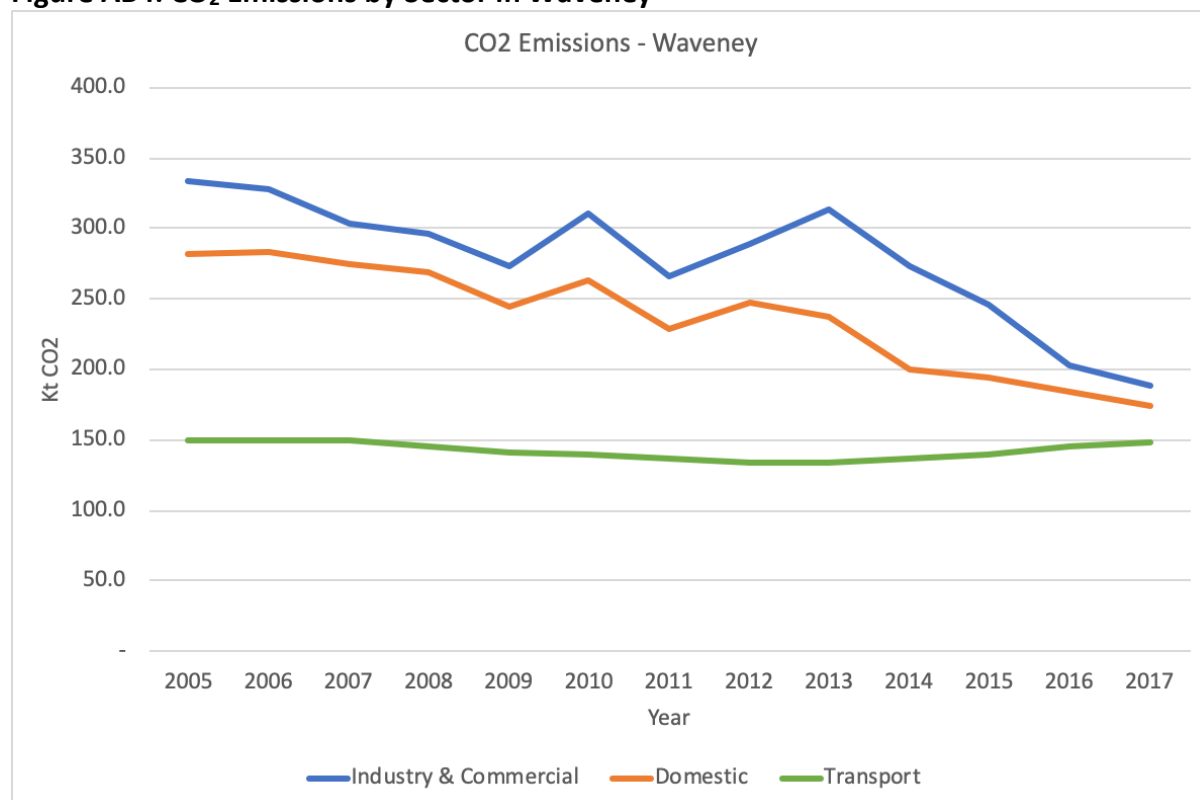
³⁷<https://www.eastsuffolk.gov.uk/assets/Your-Council/WDC-Council-Meetings/2019/March/Council-20-03-19/Item-11-APPENDIX-A-Waveney-Local-Plan.pdf>

³⁸https://www.broads-authority.gov.uk/_data/assets/pdf_file/0036/259596/Local-Plan-for-the-Broads.pdf

³⁹<https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2017>

Overall in Waveney in 2017, 37% of end-user CO₂ emissions were attributed to the industrial and commercial sector, 34% to the domestic sector, and 29% to transport. Whilst industrial/commercial and domestic emissions have shown a declining trend since 2005 (see **Figure AB4**), transport emissions have remained largely static at around 150kt CO₂. In the domestic sector, historically emissions from electricity aligned with those from gas, but there has been marked decrease in emissions from electricity, with these now 50% lower. In relation to industry and commercial, emissions significantly decreased between 2014 and 2016 in relation to electricity.

Figure AB4: CO₂ Emissions by Sector in Waveney



In relation to transport emissions, expectation is that all vehicles will be ultra-low emission by 2030. Enabling infrastructure, including electric vehicle charging points, is important in achieving this. At 4 January 2021 there were 44 public **electric vehicle** charging devices available in East Suffolk. Of these 10 were rapid charging devices. This equates to 18 devices per 100,000 population⁴⁰. This is a slight reduction in availability on 2020 levels. Charging devices have largely been funded by private sector investment. Grant funding is available for private domestic charging and workplace charging devices, however these types of devices are not included within the government statistics as they are not available to the general public.

In relation to domestic emissions, in July 2020 the new Green Homes Grant scheme was announced, which is intended to support homeowners in England in making their **homes more energy efficient**, and create new work in the construction industry. Energy Performance Certificate (EPC) data show new dwellings are more energy efficient than

⁴⁰ <http://maps.dft.gov.uk/ev-charging-map/>

existing dwellings. The median estimated CO₂ emissions and estimated energy cost for an existing house in England is more than twice as high as those for a new house. The median energy efficiency score for existing houses in East Suffolk is 63 (Band D) compared to 84 (Band B) for new homes built.

Increasing the supply of **renewable energy** allows carbon intensive energy sources to be replaced and reduce CO₂ emissions. Data from the Department for Business, Energy and Industrial Strategy⁴¹ indicates that East Suffolk has 6,529 sources of renewable energy, generating 1,202MW of electricity (2019 data). This is primarily from offshore wind (3 sites) and photovoltaics (96 sites). East Suffolk has one of the highest of levels of renewable electricity generated among all local authority areas.

In relation to climate change adaptation, **fluvial flood risk** in the BNDP area follows the River Waveney and its tributaries, as shown in **Figure AB5** which comes from the Environment Agency website. The East Suffolk Strategic Flood Risk Assessment provides further detail. Areas surrounding the low-lying reach of the river are fairly flat, so the river will spread into an extensive flood plain during times of high flow when the river overtops its banks. This floodplain area subsequently drains slowly due to low gradients, and it may be boggy and marshy.

Figure AB5: Extent of flooding from Rivers or the Sea



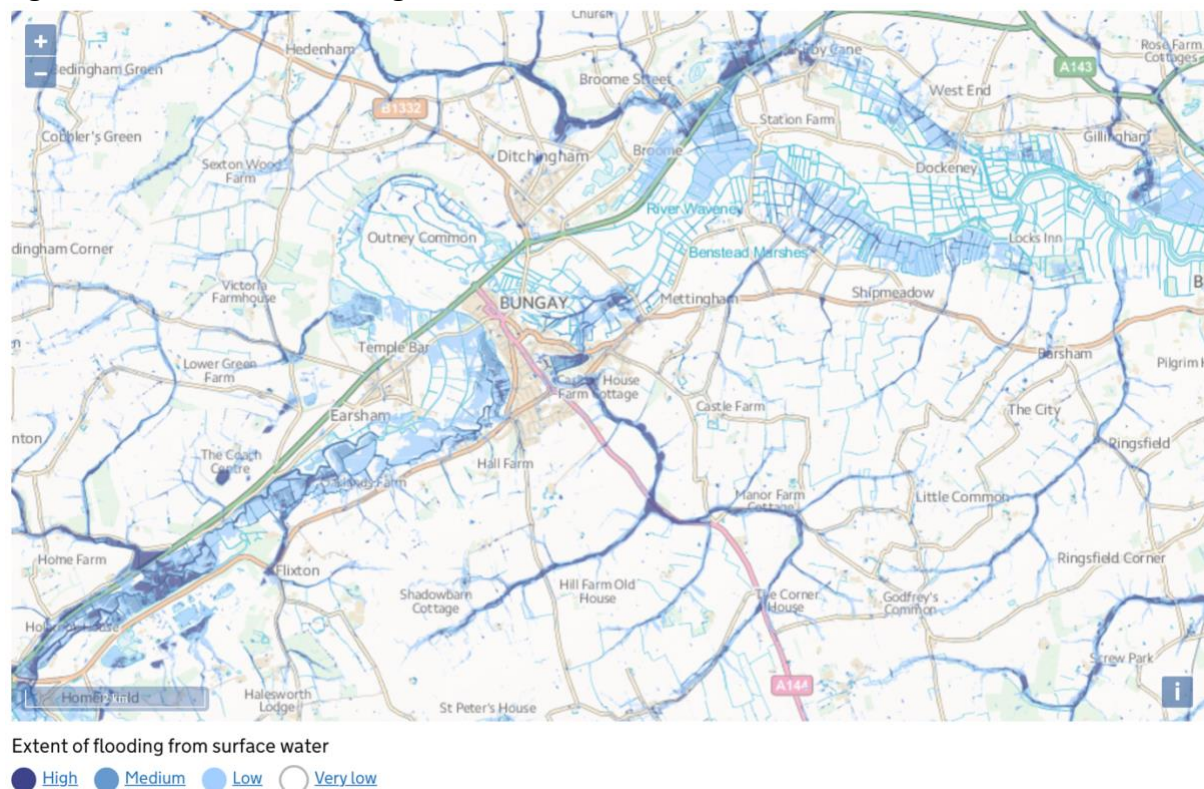
Extent of flooding from rivers or the sea
 ● High ● Medium ● Low ● Very low

⁴¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/920654/Regional_Renewables_2019.pdf

The functional floodplain, areas within an annual probability of flooding of 5%, has been mapped as part of development of the Waveney/East Suffolk Local Plan⁴². To the north of the town the functional floodplain encroaches on residential areas towards Trinity Street and Beccles Road. To the south it extends towards residential properties to the south-west of Castle Land and Boyscott Lane.

Surface water flood risk follows a similar pattern, though extends over a part of the built-up area. See **Figure AB6**. In December 2020 Bungay as part of the Waveney River Catchment area experienced unprecedented surface water flooding. This included to properties not within identified flood zones and further investigation into this is ongoing.

Figure AB6: Extent of Flooding from Surface Water



Future Baseline

Per capita CO₂ emissions are likely to continue to decrease as energy efficiency measures, renewable energy production and new technologies become more widely adopted. The most recent data indicates a slight increase in per capita transport emissions but this is likely to reduce through the ongoing adoption of energy efficient / electric vehicles. The availability of infrastructure to facilitate this, such as electric vehicle charging points, is expected to increase in the future. Transport emissions will also likely reduce due to changing work patterns and more people working remotely/at home.

Climate change has the potential to increase the number and severity of extreme weather events. Given the functional floodplain extends into the built-up area, residents and their

⁴² <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Strategic-Flood-Risk-Assessment/06-PPS25-Flood-Zones-Barnby-and-North-Cove-Beccles-Blundeston-Bungay.pdf>

property may be more at risk from flooding. The Strategic Flood Risk Assessment produced to inform the East Suffolk Waveney Local Plan shows the risk of flooding with an allowance for climate change.

Development has the potential to increase flood risk, though measures to avoid this, including policy to direct development away from flood zones 2 and 3 and encourage the use of Sustainable Drainage Systems, should be in place.

Key Issues

Waveney/East Suffolk has lower CO₂ emissions per capita when compared with equivalent data at regional and national levels, but there remains some way to go before the target of carbon neutrality is achieved.

Per capita CO₂ emissions from transport have remained static since 2005 and as emissions from other sectors have reduced, transport's share of emissions overall has risen. Opportunities should be taken for BNDP to support enabling infrastructure such as electric vehicle charging points.

Areas of high fluvial flood risk largely follow the River Waveney. Future development should avoid areas of high flood risk to better safeguard future residents and their properties. This should be considered in conjunction with the Strategic Flood Risk Assessment.

Landscape

This theme focuses on designated and protected landscapes within or near to the BNDP area, landscape character and access to green open space.

Policy Context

National Planning Policy Framework (2019)⁴³: Great weight is given to protecting and enhancing valued landscapes, particularly the landscape and scenic beauty of National Parks, the Broads and Areas of Outstanding Natural Beauty. These have the highest status of protection., with the scale and extent of development within these areas limited. All development should be sympathetic to its landscape setting.

A Green Future: Our 25 Year Plan to Improve the (2018)⁴⁴: This focuses on leaving the environment in a better condition for future generations, including through enhancing the beauty of landscapes. There is emphasis is on landscape-scale change and restoration as a way to recover nature. Landscape designations, including national parks, are important and opportunities should be taken to monitor and improve their quality for people, places and nature.

⁴³https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

⁴⁴https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

East Suffolk Council Waveney Local Plan (2019)⁴⁵: This recognises the importance of landscape character areas, requiring that development should be informed by and sympathetic to the strategic objectives and considerations identified in the districts Landscape Character Assessment (2008). Particular mention is given to development within the setting of the Broads, with measures taken to avoid and mitigate any impacts on this important landscape.

Local Plan for the Broads (2019)⁴⁶: This requires development proposals to conserve and enhance the key landscape characteristics of the Broads, with particular attention paid to defining and distinctive qualities of the varied landscape. Furthermore, restoration of landscapes will be sought where either natural or cultural heritage features of importance have been lost or degraded.

Baseline Review

Part of the BNDP area falls within **the Broads**, which has equivalent status of a national park, see **Figure AB7** at the end of this section. This is recognised as a landscape of exceptional beauty and uniqueness. The 1949 Act defines the National Park purposes as being to conserve and enhance natural beauty, wildlife and cultural heritage and to promote opportunities for the understanding and enjoyment of the special qualities by the public. The Broads shares these two purposes but also has the third purpose of protecting the interests of navigation, promoting open-air recreation. The vision for the English National Parks and the Broads relates to them being thriving, living, working landscapes, where sustainable development can be seen in action, wildlife flourishes and habitats are maintained, restored and expanded, and where everyone can discover the rich variety of England's natural and historic environment⁴⁷. These special qualities are protected under legislation and through planning policy.

The National Character Area profile for **the Broads**⁴⁸ sets out that the whole area is known for the shallow lakes, referred to as 'broads' that are contained within the river valleys. These broads are the effect of medieval excavations of peat that became flooded as sea levels rose. The agricultural landscape is based on a long history of drainage to allow livestock grazing interspersed with arable cropping, which is supported by moderately fertile river valley and flood plain soils. The low-lying marshes are traditionally unsettled, instilling a rather isolated character, while the pattern of settlement on the higher ground is clustered and linked by a minor road network that runs along the valley sides. A loose vernacular of flint, pebble and brick, with pantiles and occasionally reed thatch, adds cohesion to settlements.

Key characteristics include:

- The landscape is low-lying and has characteristic open, extensive views over slow meandering rivers, drained marshland and coastal plain in the lower valley flood plain;
- Rivers dominate the landscape;

⁴⁵<https://www.eastsuffolk.gov.uk/assets/Your-Council/WDC-Council-Meetings/2019/March/Council-20-03-19/Item-11-APPENDIX-A-Waveney-Local-Plan.pdf>

⁴⁶ https://www.broads-authority.gov.uk/_data/assets/pdf_file/0036/259596/Local-Plan-for-the-Broads.pdf

⁴⁷ Defra, English National Parks and the Broads, UK Government Vision and Circular, 2010

⁴⁸ <http://publications.naturalengland.org.uk/file/5565204962213888>

- Woodland cover is generally sparse, especially in the marshland area;
- Field patterns are principally defined by drainage over most of the Broads. Regular 18th and 19th century enclosure fields are clearly defined by straight, reed-fringed drainage ditches that form a strongly geometric layout across the lower flood plain.
- Much of the Broads is remote and isolated with settlements clustering on higher ground inland;
- Vertical features are very distinctive in this generally flat landscape and include some very fine medieval churches on higher ground and some traditional drainage mills;
- The sense of tranquillity and wildness is integral to the distinctiveness of the Broads.

The ecosystem services provided by the landscape, and which should be protected include; provisioning services (food, fibre and water supply); regulating services (water purification, air quality maintenance and climate regulation); and cultural services (inspiration, education and wellbeing). Identified opportunities of particular relevance to the BNDP area include:

- Measures to conserve and enhance the distinctive historic landscape, through securing and expanding the open water, riverine and estuarine habitats;
- Maintain a sustainable and productive agricultural landscape while expanding and connecting semi-natural habitats to benefit biodiversity and improve soil and water quality;
- Improve opportunities to enhance people's enjoyment of the area while protecting high levels of tranquillity which contribute to sense of place;
- Provide high quality green infrastructure networks;

Bungay is identified as one of the main settlements within The Broads. With respect to recent changes in the landscape, it is noted that development pressure has generally been low over the last decade, but there have been some locally significant developments, including in Bungay.

The remainder of the BNDP area falls within the **South Norfolk and High Suffolk Claylands National Character Area**⁴⁹. The high and predominantly flat clay plateau dominates the character of the landscape, which is incised by numerous small-scale wooded river valleys.

The landscape has both confined areas with intimate views and more open views with a sense of exposure. The underlying geology is chalk, which forms a principle aquifer, and the rivers are mostly small and slow flowing which contributes to the character of the landscape. The Waveney is the largest river in this area and forms a physical division between the counties of Norfolk and Suffolk. The river valleys contain an important mosaic of small-scale pasture, wet heath, reedbeds and woodland that provide ecological connectivity into the heart of the claylands.

Key characteristics include:

- Scattered areas of ancient woodland, game copses, shelterbelts, valley floor plantation and carr woodland as well as hedgerow trees provide a treed landscape character;
- Extensive areas of arable farming with a strong utilitarian and rural character demonstrated through ancient irregular field patterns.

⁴⁹ <http://publications.naturalengland.org.uk/file/5427224945623040>

- A dispersed settlement pattern of small nucleated market towns with architectural variety and colour, loosely clustered villages and scattered hamlets;
- Large, often interconnected village greens or commons are a key feature, along with long distance footpaths, country estates and parklands.

The ecosystem services provided by the landscape, and which should be protected include; provisioning services (food, fibre and water supply); regulating services (water purification, air quality maintenance and climate regulation); and cultural services (inspiration, education and wellbeing). Identified opportunities of particular relevance to the BNDP area include:

- Maintain and enhancing the rural character of the landscape and the contrast between the arable plateau and pastoral river valleys;
- Measures that conserve and enhance the characteristic historic settlement patterns and historic features;
- Maintain and enhance the river valleys and their grazed flood plains;
- Protect and enhance the area's ancient semi-natural woodlands, copses, river valley plantations and ancient boundaries including hedgerows and hedgerow trees;
- Improve opportunities for people to access, enjoy and understand rural and historic landscape assets, including recreational and tranquil areas.

At a more local level, the **Suffolk Landscape Character Assessment** characterises the BNDP area with four landscape character types. The key characteristics of each of these is identified in **Figure AB8**.

Figure AB8: Suffolk Landscape Character Types in BNDP area

Suffolk landscape Character Type	Key Characteristics
Wooded valley meadowlands and fen	<ul style="list-style-type: none"> • Flat valley bottom • Extensive peat deposits • Cattle grazed pasture • Network of drainage ditches • Areas of unenclosed wild fenland • Widespread plantation and carr woodland • Important sites for nature conservation • Localised settlement on the valley floor islands • Sense of quiet and rural isolation in many places
Rolling valley claylands	<ul style="list-style-type: none"> • Gently sloping valleys on medium clay soils • Occasional notable steeper slopes • Fields often smaller than on surrounding plateau • Localised influence of landscape parks • Focus of settlement • Few large greens or commons • Ancient woodland on the upper fringes of the valley sides
Rolling valley farmlands and furze	<ul style="list-style-type: none"> • Valleys with prominent river terraces of sandy soil • Small areas of gorse heathland in a clayland setting • Straight boundaries associated with late enclosure • Co-axial field systems

	<ul style="list-style-type: none"> • Mixed hedgerow of hawthorn, dogwood and blackthorn with oak, ash and field maple • Fragmentary cover of woodland • Sand and gravel extraction • Golf courses • Focus for larger settlements
Ancient plateau claylands	<ul style="list-style-type: none"> • Flat or gently rolling arable landscape of clay soils dissected by small river valleys • Field pattern of ancient enclosure – random patterns in the south but often co-axial in the north. Small patches of straight-edged fields associated with the late enclosure of woods and greens • Dispersed settlement pattern of loosely clustered villages, hamlets, and isolated farmsteads of medieval origin • Villages often associated with medieval greens or tyes • Farmstead buildings are predominantly timber-framed, the houses colour-washed and the barns blackened with tar. Roofs are frequently tiled, though thatched houses can be locally significant • Scattered ancient woodland parcels containing a mix of oak, lime, cherry, hazel, hornbeam, ash and holly • Hedges of hawthorn and elm with oak, ash and field maple as hedgerow trees • Substantial open areas created for WWII airfields and by 20th century agricultural changes • Network of winding lanes and paths often associated with hedges create visual intimacy

Bungay was also considered in the **Settlement Fringe Landscape Sensitivity Study (2016)**⁵⁰, which considered the indicative capacity of landscapes around settlements to accommodate different scales of development, taking into account their inherent landscape sensitive, value and, where applicable their contribution to the setting of the Broads.

The **Broads Landscape Character Assessment (2016)**⁵¹ characterises the BNDP area with two character types, Waveney-Outney Common and Bath Hills Area and Waveney – East of A143 Bungay/Ditchingham to Shipmeadow/Geldeston. **Figure AB9** provides an overview of key landscape characteristics in relation to these.

Figure AB9: The Broads Landscape Character Types in the BNDP Area

Broads Landscape Character Type	Key Characteristics
Waveney – Outney Common and Bath Hills Area	The 400acres Outney Common contains a large deposit of sands and gravel and ground cover has

⁵⁰ <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/First-Draft-Local-Plan/Settlement-Fringe-Landscape-Sensitivity-Study.pdf>

⁵¹ <https://www.broads-authority.gov.uk/planning/planning-policies/landscape-character-assessments>

	<p>heathland attributes of acid grassland, gorse, bramble, stunted oaks, pines and birch which is relatively unusual in the Broads area.</p> <p>Area forms part of the upper Waveney valley floodplain</p> <p>Much of the area is surrounded by wooded undeveloped skylines, except where the Common meets with the A143 interface with Bungay;</p> <p>A sense of movement and reflectivity is created by the River Waveney which follows a meandering course through the valley floor and creates a broad loop around the slightly elevated Common land;</p> <p>Care needs to be taken when landscape change occurs</p>
<p>Waveney – East of A143 Bungay/Ditchingham to Shipmeadow/Geldeston</p>	<p>A calm, tranquil, isolated pastoral landscape</p> <p>The marshland is predominantly grass which is used for grazing during the summer months and is prone to flooding;</p> <p>There are pockets of arable land and relatively little tree cover;</p> <p>The landscape is only lightly settled, with small hamlets associated with the minor rural road network;</p> <p>Settlement pattern is largely one of valley edge farmsteads arranged in a linear pattern between the town of Bungay and Geldeston;</p> <p>Localised areas of intrusion exist on the eastern edge of Bungay and the A143;</p> <p>Characterised as settlement fringe, the settlement extends into the floodplain;</p>

The Bungay Conservation Area Character Appraisal⁵² sets out that the towns location, on a low ridge above and looking across water meadows, affords it some stunning views out into the open countryside.

Despite its surroundings, limited **green space** exists within the settlement of Bungay itself. **Figure AB10** provides an overview of green spaces within the town. There are no parks or gardens, and the Open Space Needs Assessment (2015)⁵³ identifies that levels of park provision do not meet the expectations of the local community. Bungay also has one of the lowest levels of open space – just 3.63ha. The report goes on to suggest that access to Outney Common in Bungay offsets the shortfall in park provision, though creating at least one open space that meets the standards expected of a park should be considered.

⁵² East Suffolk Council (2007) Bungay Conservation Area Character Appraisal [online] available at <https://www.eastsuffolk.gov.uk/assets/Planning/Design-and-Conservation/Conservation-Area-Appraisals/Bungay-Conservation-Area-Character-Appraisal.pdf>

⁵³ <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Open-Space-Needs-Assessment.pdf>

The Waveney Green Infrastructure Strategy (2015)⁵⁴ identifies that access to natural and semi-natural green space in the Bungay area meets some Natural England recommended standards, but improved access would benefit the community. Key findings in the Bungay area include:

Outney Common is the most significant semi-natural green space accessible to local residents, though the value of this is limited as part of the site is used as a golf course; The public rights of way network in the nearby countryside is often disconnected, reducing access to semi-natural areas
There is little public access to semi-natural areas within or adjacent the built-up area.

Key recommendations include improving signage, exploring the potential to improve public access to the Waveney Valley and improvements to the semi-natural area of Castle Hills to increase the value of this site for local people.

Future Baseline

The highest level of protection will continue to be afforded by national and local plan policy to the part of the BNDP area which falls within the Broads, which has equivalent status of a national park. Future development may provide opportunities to improve the landscape buffer between the town / industrial area of Bungay and the Broads landscape to the north.

New development also has the potential to change the quality of the landscape within and surrounding the BNDP area, and it could lead to the loss of key landscape features, such as hedgerows and hedgerow trees.

The BNDP, alongside existing strategies, offers the opportunity to take a more coordinated approach to improving green infrastructure networks and access to green open space, which would be to the benefit of the local community.

Key Issues

The Norfolk and Suffolk Broads form part of the BNDP area and are a place in which the quality of landscape is formally recognised and given statutory status to conserve and enhance natural beauty and promote open-air recreation. These special qualities are protected under legislation and through planning policy. Care needs to be taken when landscape change occurs in this area to ensure that the positive characteristics that contribute its unique sense of place are conserved and enhanced.

The visual impacts of the built development and infrastructure around Bungay can detract from the perceived naturalness of the area, including to the north and south of the settlement. Opportunities to mitigate against these impacts could be sought.

There is limited access to green open space within the Bungay. BNDP provides opportunities for enhanced landscape protections and provision with respect to new green infrastructure requirements in Bungay. The 'accessibility and transport' theme considers access into the countryside, via public rights of way in more detail, with this generally considered to be good.

⁵⁴ <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Green-Infrastructure-Strategy.pdf>

Figure AB7: The Broads Authority Executive Area

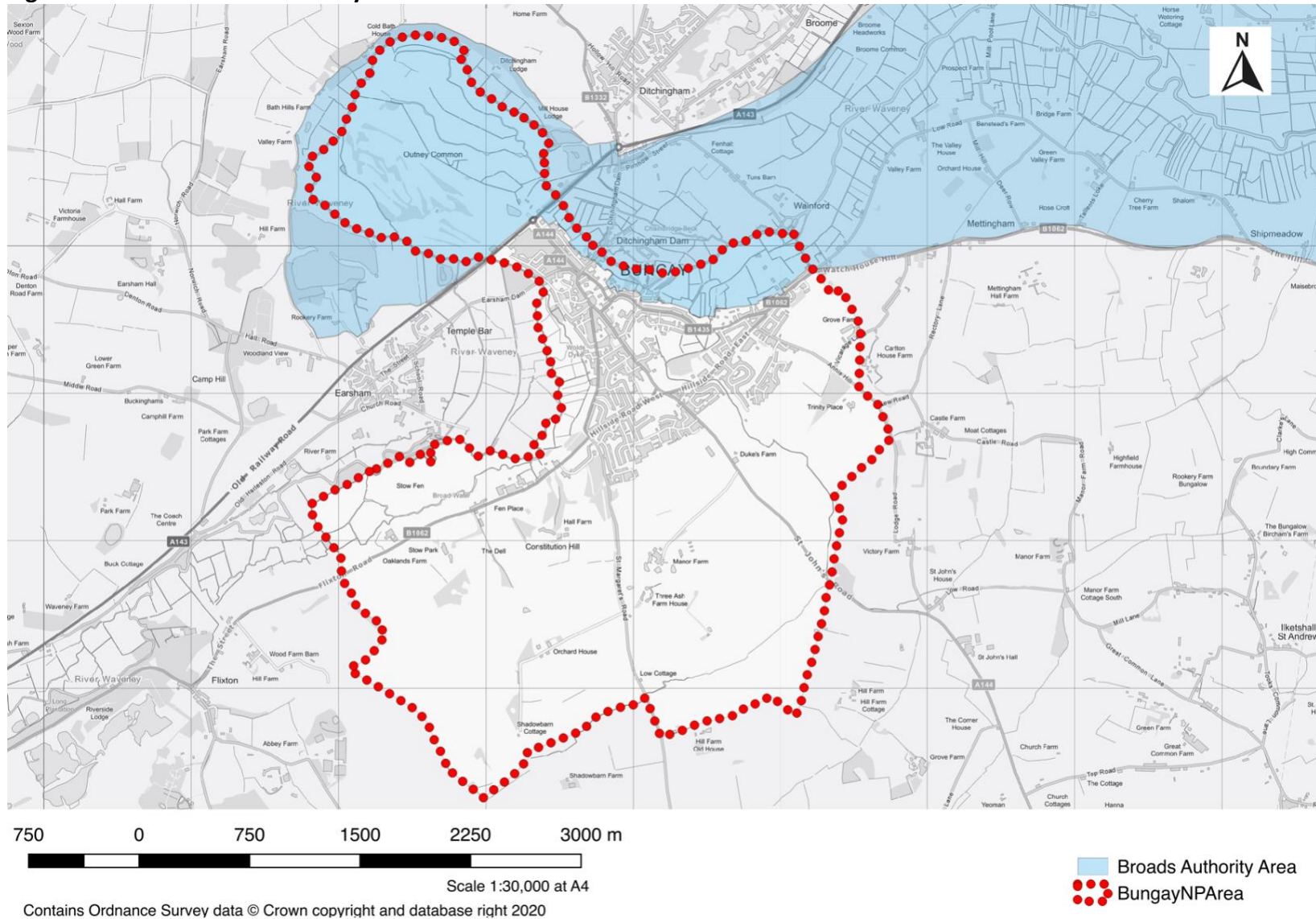
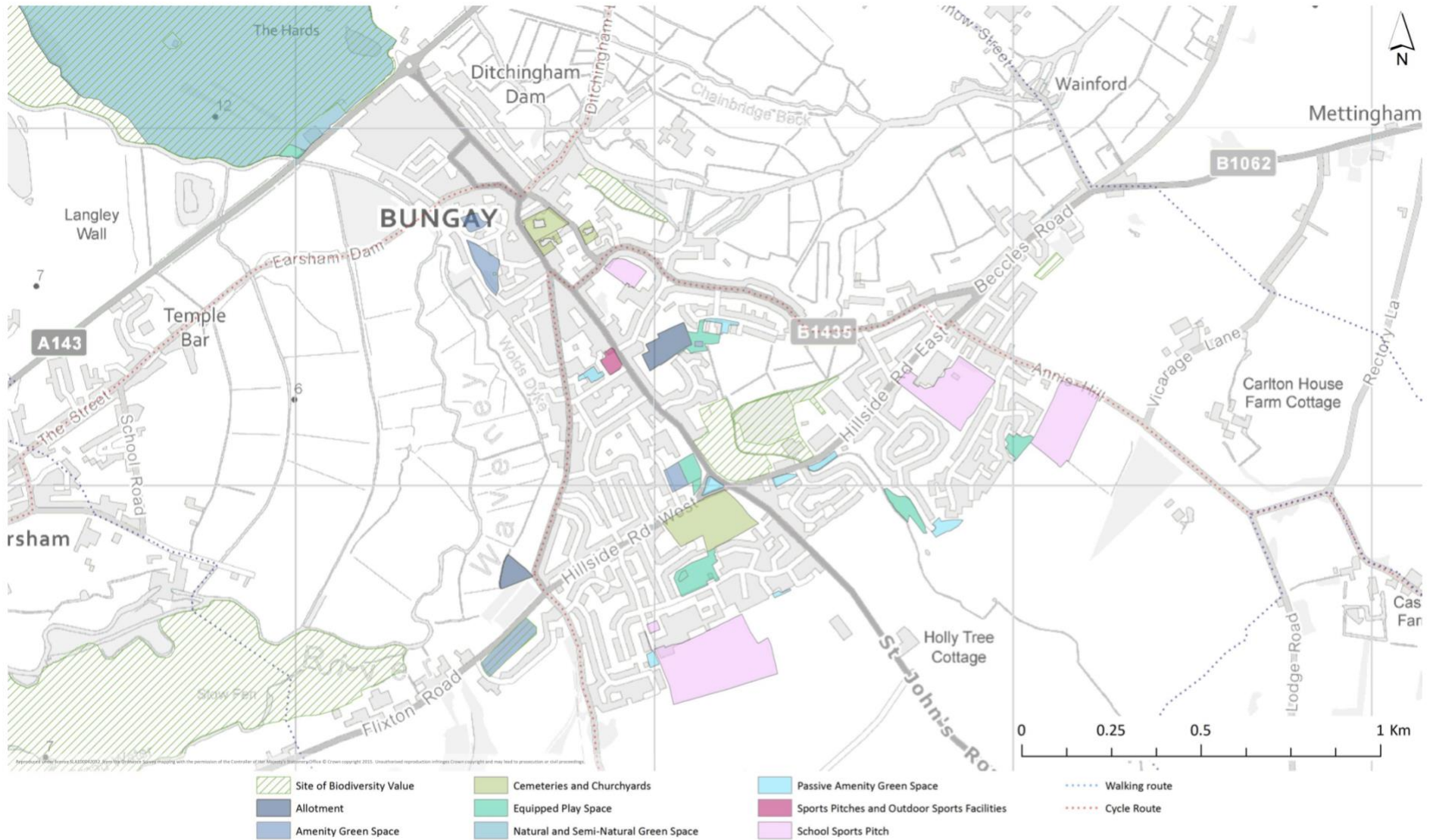


Figure AB10: Green Open Space within Bungay



Source: Waveney Green Infrastructure Strategy, 2015

Water Resources, Soil and Land

Policy Context

National Planning Policy Framework (2019)⁵⁵: This seeks to protect high quality soils, the best and most versatile agricultural land and improve the water environment. Wherever possible development should improve local environmental conditions including water quality. The NPPF looks to facilitate the sustainable use of minerals with local authorities required to plan for an adequate supply and great weight given to the benefits of mineral extraction.

A Green Future: Our 25 Year Plan to Improve the Environment (2018)⁵⁶: Key goals include achieving cleaner air and water by reducing harmful pollution and emissions, maximising resource efficiency, minimising environmental impacts, implementing sustainable drainage systems and improving water quality of rivers, lakes, coast and ground waters. Improving soil health as the foundation of farming and forestry is a key policy area.

Safeguarding our Soils: A strategy for England (2009)⁵⁷ This recognises that soil is a fundamental and non-renewable natural resource and critical component of our environment, providing ecosystem services relating to water regulation, carbon storage and supporting biodiversity. The strategy intends to reverse the trend of soil degradation and pollution.

Essex and Suffolk Water - Water Resource Management Plan (2019)⁵⁸ This is a 40-year plan that forecasts the demand for water in the future against the resources available. There is an intention to tackle the impacts of climate change and protect and improve the environment around the water resources they use.

Waste Management Plan for England (2013)⁵⁹ This provides an analysis of the waste management situation across England and sets out how the requirements of Article 28 of the Waste Framework Directive will be met. Emphasis is on moving to a zero waste economy where material resources are reused, recycled or recovered wherever possible.

Suffolk Minerals and Waste Local Plan (2020)⁶⁰: This positively identifies and safeguards sites for the extraction and sustainable management of minerals and waste. None of these sites are within or near to the BNDP area.

⁵⁵https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

⁵⁶https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

⁵⁷<https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>

⁵⁸<https://www.nwg.co.uk/wrmp>

⁵⁹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf

⁶⁰<https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/suffolk-minerals-and-waste-development-scheme/>

Local Plan for the Broads (2019)⁶¹ and East Suffolk Council Waveney Local Plan (2019)⁶²:

The local plans both contain policies intending to safeguard water quality and quantity, ensure the sustainable use of resources, protect soil and make the most efficient use of land.

Baseline Review

Water

The main waterbody in the BNDP area is the **River Waveney**. The source of the river Waveney is in the Redgrave and Lopham Fen NNR, from where it travels east through the towns of Diss, Harleston, Bungay and Beccles. Finally, the Waveney flows past Burgh castle into Breydon Water joining the river Yare to reach the sea at Great Yarmouth. The Waveney branches off to Oulton Broad towards Lowestoft where a sea lock divides sea water, linking Oulton Broad with Lake Lothing and the sea. Parts of the river Waveney fall within the Broads NP and for much of its length forms the boundary between the counties of Norfolk and Suffolk.

Environment Agency records⁶³ show that the Waveney catchment is made up of twenty waterbodies. All of the waterbodies which fall within and adjacent the BNDP area have consistently achieved a 'moderate' ecological status since 2013 and had good chemical status between 2013 and 2016. However, in 2019, they all failed in terms of their chemical status. Reasons for not achieving good status include; pollution from rural areas relating to agriculture and rural land management; pollution from wastewater and physical modifications. In relation to wastewater, The Rivers Trust report 'Is my river fit to play in?'⁶⁴ identifies that during 2019 there were 23 incidences of storm overflow from the sewers on Earsham Street and 4 incidences from Nethergate Street into the River Waveney. This is a concern given the current trend in more extensive use of the river for activities such as wild swimming and paddle boarding, both of which have become popular in the Bungay area over the last year.

The BNDP area is served by **Essex and Suffolk Water**, with Bungay falling into their Northern Central Water Resource Zone. Approximately 70% of the water supplied within this zone is sourced from surface water, the remainder sourced from groundwater. The River Waveney is one source of the surface water. The Water Resource Management Plan analyses supply and demand, factoring in climate change, it concludes that given the supply surplus, no supply or demand schemes will be required. The plan overall prioritises demand management and promoting greater water efficiency.

Groundwater supplies around a third of the drinking water in the wider zone. The Environment Agency has designated Groundwater Source Protection zones, which include wells, boreholes and springs used for public drinking water sources. The groundwater from these zones all finishes up in a public drinking water supply, and it is essential to protect it from contamination from any activities that might cause pollution in the area. The closer the

⁶¹ https://www.broads-authority.gov.uk/data/assets/pdf_file/0036/259596/Local-Plan-for-the-Broads.pdf

⁶² <https://www.eastsuffolk.gov.uk/assets/Your-Council/WDC-Council-Meetings/2019/March/Council-20-03-19/Item-11-APPENDIX-A-Waveney-Local-Plan.pdf>

⁶³ <https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3518/Summary>

⁶⁴ <https://www.riverstrust.org/2019/10/25/world-rivers-day-rivers-fit-to-swim-in/>

activity to the actual borehole, the greater the risk. Around half of the BNDP area falls within a **Groundwater Source Protection Zone**, predominantly Zone 3 but also a small area of Zone 2 and Zone 1 lies adjacent the area, see **Figure AB11**. Further to this, the whole of the BNDP area lies within a **Drinking Water (Surface Water) Safeguard Zone**. These are areas identified as at risk of failing national drinking water protection objectives. Whilst these are non-statutory designations, action is taken within these areas to address water contamination, with the aim of avoiding extra treatment by water companies.

Nitrate Vulnerable Zones (NVZs) denote areas at risk from agricultural nitrate pollution and much of the East of England, including the whole of the BNDP area, is identified as an NVZ⁶⁵. These zones identify rules in relation to the use of fertilisers and manures as well as a requirement to prevent water pollution from farm areas.

Soil

The **Agricultural Land Classification (ALC)** classifies land into six grades – plus non-agricultural and urban, where Grades 1 to 3a are recognised as being the best and most versatile land and Grades 3b to 5 are of poorer quality. The BNDP area is predominantly Grade 3 land, with some Grade 4 around the River Waveney, and a very small patch of Grade 2 on the eastern edge of the area, see **Figure AB12**. It is not possible to distinguish between Grade 3a and 3b in the provisional data available from Natural England, and therefore uncertain whether the majority of the plan areas is considered to be the best and most versatile or not.

The Predictive Best and Most Versatile Land Assessment⁶⁶ indicates that the western extent of the area of 3B has a high likelihood (>60%) of Best and Most Versatile Land, with the remainder a moderate likelihood (20-60%).

Geology, Minerals and Waste

The bedrock geology of the BNDP area is sand, a sedimentary bedrock formed between 5.333million and 11.8 thousand years ago during the Neogene and Quaternary periods. There are also superficial deposits of Lowestoft Formation – Diamicton (chalky till together with outwash sands and gravels, silts and clays), and Happisburgh Glacigenic Formation – Sand. Superficial deposits in the immediate vicinity of the River Waveney include River Terrace deposits of sand and gravel and Breydon Formation – Clay and silt⁶⁷.

The Suffolk Minerals and Waste Local Plan⁶⁸ does not propose any new minerals or waste sites within the BNDP area. However, the whole area does fall within a Minerals Consultation Area, defined to ensure that minerals resources are not unnecessarily serialised through planning.

⁶⁵ <https://environment.data.gov.uk/farmers/>

⁶⁶ <http://publications.naturalengland.org.uk/publication/6205542189498368?category=5208993007403008>

⁶⁷ <https://mapapps.bgs.ac.uk/geologyofbritain3d/>

⁶⁸ <https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/suffolk-minerals-and-waste-development-scheme/>

Future Baseline

Requirements of the Water Framework Directive, and national legislation, are likely to lead to continued improvements to water quality in the BNDP and wider area. Additionally, the Water Resource Management Plan for Essex and Suffolk Water, which plans up to 2045, will continue to address water supply and wastewater management issues. However, future development has the potential to affect water quality through increased consumption, waste-water discharges, water run-off, diffuse pollution and modification.

Development has the potential to affect both soil and mineral resources in the BNDP area, including through the loss of agricultural land which has a high potential of being the best and most versatile.

Key Issues

Recent data indicates that the chemical status of water in the BNDP area has declined, and this could be exacerbated by further growth. The BNDP should ensure that measures are taken to avoid detrimental impacts and where possible improve water quality through development.

There is high potential for the best and most versatile agricultural land to exist within the BNDP area, though the precise classification is unknown. BNDP provides the opportunity to avoid or minimise the loss of agricultural land in these areas.

With regards to mineral safeguarding areas, the BNDP falls within a minerals consultation area, which means that sand and gravel resources may be present and need to be safeguarded

Figure AB11: Water Resources

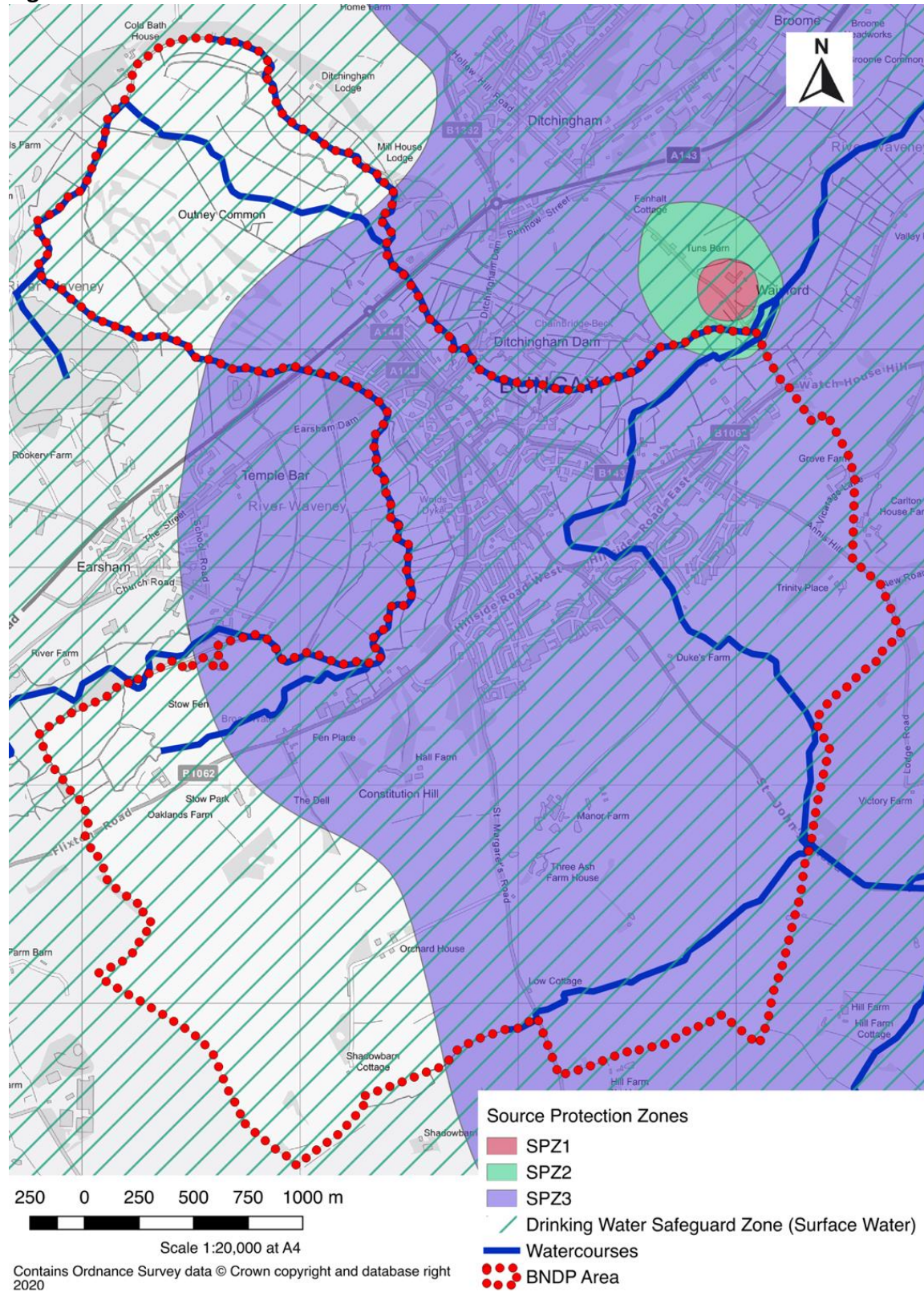
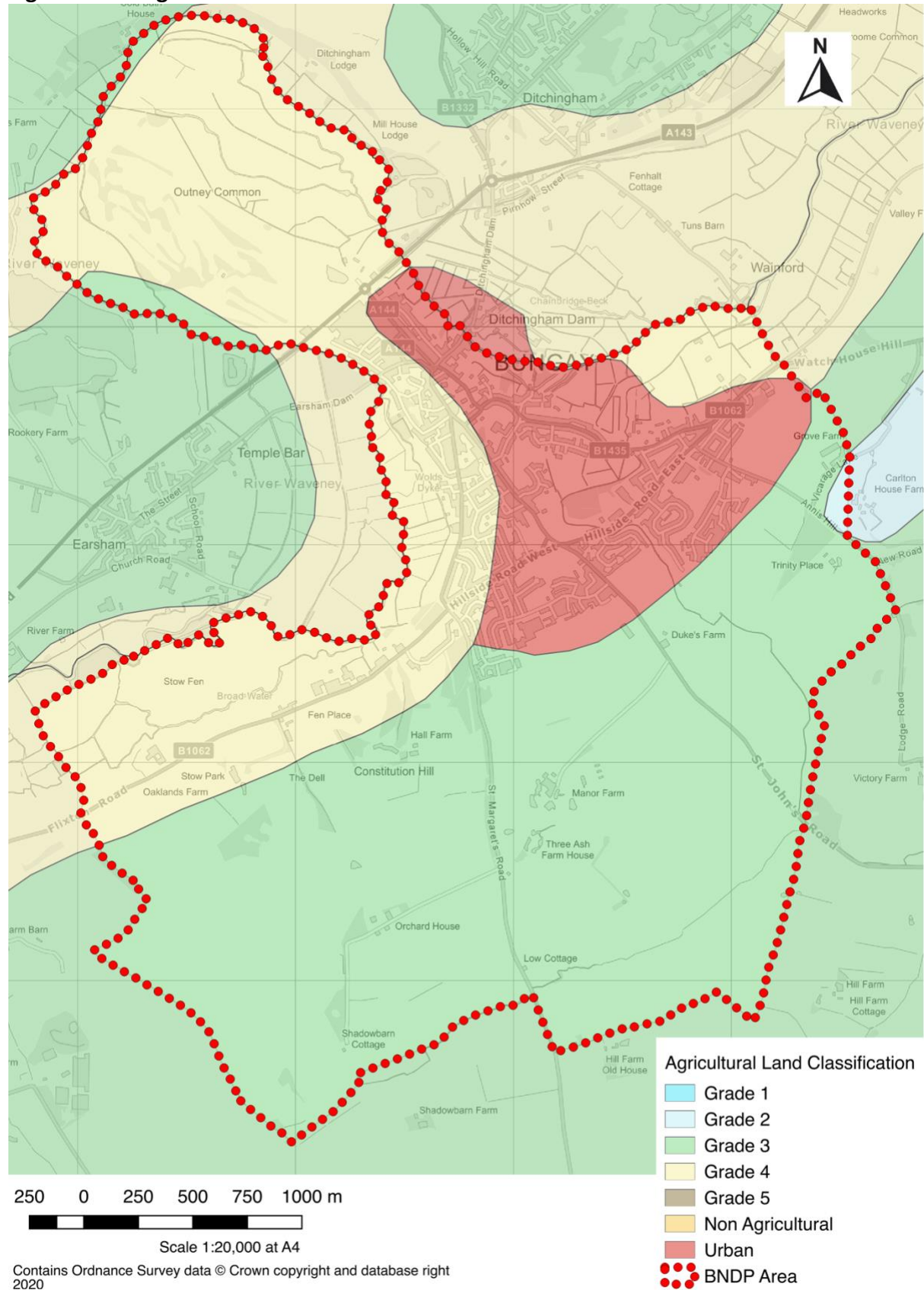


Figure AB12: Agricultural Land Classification



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Historic Environment

Policy Context

National Planning Policy Framework (2019)⁶⁹: Section 16 of the NPPF sets out that heritage assets should be conserved in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of existing and future generations. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment.

A Green Future: Our 25 Year Plan to Improve the (2018)⁷⁰: This recognises that heritage has an economic, social and environmental value and makes an important contribution towards achieving a healthier environment.

Heritage Statement (2017)⁷¹: This sets out the government's direction and priorities for England's heritage. It is structured around the key themes of creating great places; heritage for everyone; heritage is international; and creating a sustainable and resilient heritage sector. There is emphasis on heritage being accessible and benefiting everyone in society.

Neighbourhood Planning and the Historic Environment, Historic England Advice Note 11 (2018)⁷²: This provides support for groups developing Neighbourhood Plans in relation to building up evidence in relation to the historic environment, considering opportunities for conserving and improving heritage, bringing heritage into design and preparing a local list of heritage assets.

Local Heritage Listing: Identifying and Conserving Local Heritage (2021)⁷³: This sets out that non-designated heritage assets can be identified in Neighbourhood Plans and guidance to ensure consistency of identification.

The National Design Guide (2019)⁷⁴: Within this, heritage is considered a key part of the context or location for development. There is an expectation that proposals positively relate to the history and heritage of the site and its setting.

Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment⁷⁵: This provides guidance on heritage considerations during the SEA process and on implementing historic environment legislation, the relevant policy in the NPPF and related guidance given in PPG.

⁶⁹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

⁷⁰https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

⁷¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/664657/Heritage_Statement_2017_final_-_web_version_.pdf

⁷²<https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/neighbourhood-planning-and-the-historic-environment-historic-england-advice-note-11/>

⁷³<https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/heag301-local-heritage-listing/>

⁷⁴https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962113/National_design_guide.pdf

⁷⁵<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/heag036-sustainability-appraisal-strategic-environmental-assessment/>

East Suffolk Council Waveney Local Plan (2019)⁷⁶: This sets out a requirement for all heritage assets (designated and non-designated) to be positively protected and enhanced. All development proposals which have potential to impact on heritage assets or their settings should be supported by a Heritage Impact Assessment.

Local Plan for the Broads (2019)⁷⁷: This requires that key buildings, structures and features which contribute to the Broads' character and distinctiveness will be protected from inappropriate development or change. Repair or reuse of heritage assets is encouraged. There is an intention to better understand, protect and enhance the archaeology of the Broads, in recognition of the area's status as having 'exceptional waterlogged heritage'.

Baseline Review

In terms of nationally designated assets, within the BNDP area there are 189 **listed buildings**, including four Grade I and four Grade II* listed. These are identified in **Figure AB13**. Of note includes:

- Bungay Castle (Grade I): the remains of an early medieval castle, its keep, gatehouse, curtain wall and substantial remnants of the castle's inner bailey wall. The upstanding historic fabric forms a centrepiece of a more extensive historic landscape encompassing the castle site's defensive earthworks and the area enclosed by these defences, sections of which are designated as scheduled monuments.
- Holy Trinity Church (Grade I): Bungay's oldest building with a distinct round tower that dates to the late Saxon period.
- St Mary's Church (Grade I): impressive 12th century church built to serve a small Benedictine priory, the ruins of which can still be seen in the churchyard to the east.

There are three **scheduled monuments** within the plan area – Bungay Castle, Castle Hills and The Butter Cross, which was once a prison. Bungay Castle is also on the Heritage At Risk Register. The **Heritage At Risk Register** identifies designated assets which are at most risk of being lost as a result of neglect, decay or inappropriate development. Just outside of the plan area is Mettingham Castle, another scheduled monument which is on the at-risk register.

A proportion of the town is designated a **Conservation Area** by East Suffolk Council. The Conservation Area Character Appraisal⁷⁸ sets out that Bungay has a rich history, with evidence of human activity going back at least six thousand years. The site of the town had strategic potential as a crossing point of the river, and its elevated position made it defensible. The town grew first in response to its strategic significance and then through local trade, abetted by improvements in river, road and rail services in the 17th and 18th century. Substantial rebuilding of the town following fires in the late 17th century determined much of its architectural character.

⁷⁶<https://www.eastsuffolk.gov.uk/assets/Your-Council/WDC-Council-Meetings/2019/March/Council-20-03-19/Item-11-APPENDIX-A-Waveney-Local-Plan.pdf>

⁷⁷ https://www.broads-authority.gov.uk/_data/assets/pdf_file/0036/259596/Local-Plan-for-the-Broads.pdf

⁷⁸ East Suffolk Council (2007) Bungay Conservation Area Character Appraisal [online] available at <https://www.eastsuffolk.gov.uk/assets/Planning/Design-and-Conservation/Conservation-Area-Appraisals/Bungay-Conservation-Area-Character-Appraisal.pdf>

The spaces within the town are generally linear, enclosed by two or three storey buildings at the street edge. The general character is building dominated, and of local vernacular character. There is significant visual unity in architectural style and materials which imparts a specific character. Georgian style, red or yellow brick and colour washed timber frame with red or black pantile roofs in the central area; 19th century brick terraced houses within pantile or slate roofs in The Ollands Area; small scale 19th century artisan red brick terraces in Southend Road; and a 19th century industrial character in the Staithe Area.

St Mary's Church (Grade I listed) is 27m high and is the major landmark of the town centre. From outside the town the tower is visible from the south across the Ollands meadows, from the A144 at Dukes Farm; from Earsham Dam west of the town; and from the northern bypass.

Not all elements of the historic environment are protected under statutory designation.

Non-designated heritage assets are locally identified buildings, monuments, sites, places, areas or landscapes identified by plan making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets. The Conservation Area Appraisal identifies over 150 non-listed buildings and structures of importance within the town centre.

There may well be more heritage assets of local importance that could be identified within the wider parish. The **Historic Environment Record** lists details on local archaeological finds and sites, historic buildings and landscapes. For Bungay it has 86 records including monuments, find spots, farmsteads and buildings from a range of periods. One building of note in Bungay Town Centre is the **King's Head Hotel**, a former coaching inn which occupies a prominent location and has been empty in need of restoration since 2010. The building makes a considerable impact on the streetscene in the historic town centre, it was recently purchased by a developer.

Bungay's heritage is part of what makes it a popular destination for visitors. The Bungay Museum, established in 1963, displays items charting the town's history, society and business, helping to make the areas heritage more accessible to the public.

The **Bungay Neighbourhood Plan Design Guidelines, 2019**⁷⁹, developed by AECOM, sets out the principle characteristics of the historic core as:

- The curvy linear layout reflects an unfolding pattern, creating enclosed and open views and distinctive spaces;
- Built form defines the streetscape; the historic core achieves this in part through unity of building line, with the built form often accommodating varied architectural styles/typologies;
- A comfortable variation in the size and scale of buildings (two and three storeys) which enhances its character of variety and difference, as opposed to homogeneity;
- The mature landscape within the town centre is comprised of mainly the church yards and front gardens contrasting the enclosed and dense arrangement of the narrow streets;

⁷⁹<https://www.bungaytowncouncil.gov.uk/docs/NDP/BUNGAY%20NEIGHBOURHOOD%20PLAN%20DESIGN%20GUIDELINES.pdf>

- Within the conservation area most of the buildings are directly fronting the street without any private space;
- Outside the historic core, development during the 20th century and early 21st century has departed from this traditional pattern towards more peripheral ‘cell’ housing estates.

The Design Guide goes on to provide key principles for future development in the BNDP area to ensure that the local character and historic distinctiveness is retained and enhanced.

Future Baseline

Designated and non-designated heritage assets will continue to be protected through national and local plan policy. Future development has the potential to impact on the general historic character of Bungay and its setting. Cumulative impacts are most likely – as over time more and larger developments may change the overriding nature, general materials or layout of residential areas in the town.

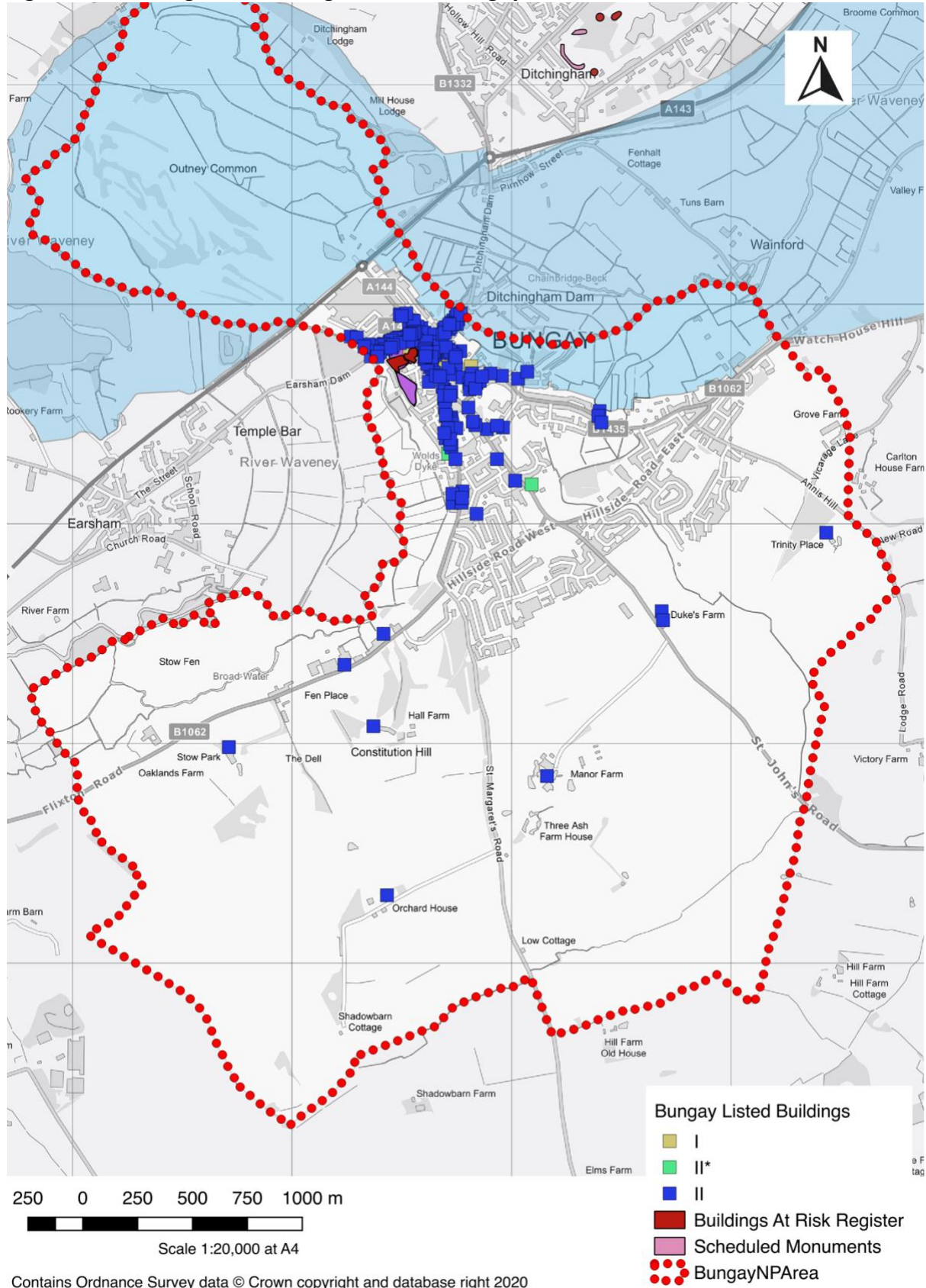
At present the streetscene within the historic core of the town centre is impacted considerably by the derelict King’s Head Hotel. This has recently been sold to a business operator with hotels portfolio and any improvement would have a positive impact upon the town centre and public realm. Further to this, the impact of Covid on the town centre environment is still to be determined, but is likely to lead to an increase in vacant premises, which may impact negatively on the streetscene and setting of the historic centre.

Key Issues

Bungay has a rich history and a wealth of designated and non-designated heritage assets exist today, particularly in the historic core of the town which is designated a Conservation Area. This requires careful protection and sympathetic conservation. Future development will need to minimise impacts upon this and take opportunities to improve the public realm.

Bungay Castle is on the heritage at risk register, and opportunities should be taken to restore the asset. Within the town centre there are also assets of local heritage value that may require protection.

Figure AB13: Designated Heritage Assets in Bungay



Population and Health

This theme focuses on population data, housing, household deprivation and health and wellbeing indicators. There are synergies between this theme and accessibility and transport.

Policy Context

National Planning Policy Framework (2019)⁸⁰: Enable and support healthy lifestyles through the provision of appropriate infrastructure, services and facilities including green infrastructure, allotments and layouts which encourage walking and cycling.

Equality Act (2010): this was brought in to reduce inequality and discrimination and ensure all members of the community are provided with equal opportunities. The Act covers nine protected characteristics – age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, marriage and civil partnership. The Public Sector Equality Duty, set out in Section 149 of the Act, requires public bodies to give due regard to the need to promote equality of opportunity, tackle unfair discrimination and promote good relations between different people.

Health Equity in England: The Marmot Review 10 Years On (2020)⁸¹: This identifies that the health gap between less and more deprived areas has grown in the last 10 years. Those living in deprived communities spend more of their lives in poor health and improvements in life expectancy have stalled or declined for the poorest 10% of women.

Suffolk Joint Health and Wellbeing Board Strategy Refresh 2019-2022 (2019)⁸²: This provides a vision and policy framework for Suffolk partners to improve the overall health and wellbeing of people in Suffolk. It encourages integrated working between the NHS, local authorities, the police and other public and voluntary sector organisations.

East Suffolk Council Waveney Local Plan (2019)⁸³: This contains policies relating to access to healthcare, green infrastructure, open spaces, design and active travel. Additionally, the strategy for Bungay, which allows for modest growth, recognises a specific need to deliver improvements in medical provision and green infrastructure, including allotments and access to new green open space.

Local Plan for the Broads (2019)⁸⁴: This encourages development that supports healthy choices, behaviours and a reduction in health inequalities. There are policies relating to green infrastructure, open space, amenity, design and sustainable travel and tourism.

⁸⁰https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

⁸¹ <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

⁸² <https://www.suffolk.gov.uk/assets/council-and-democracy/our-aims-and-transformation-programmes/Joint-Health-and-Wellbeing-Board-Strategy-Refresh-2019-2022.pdf>

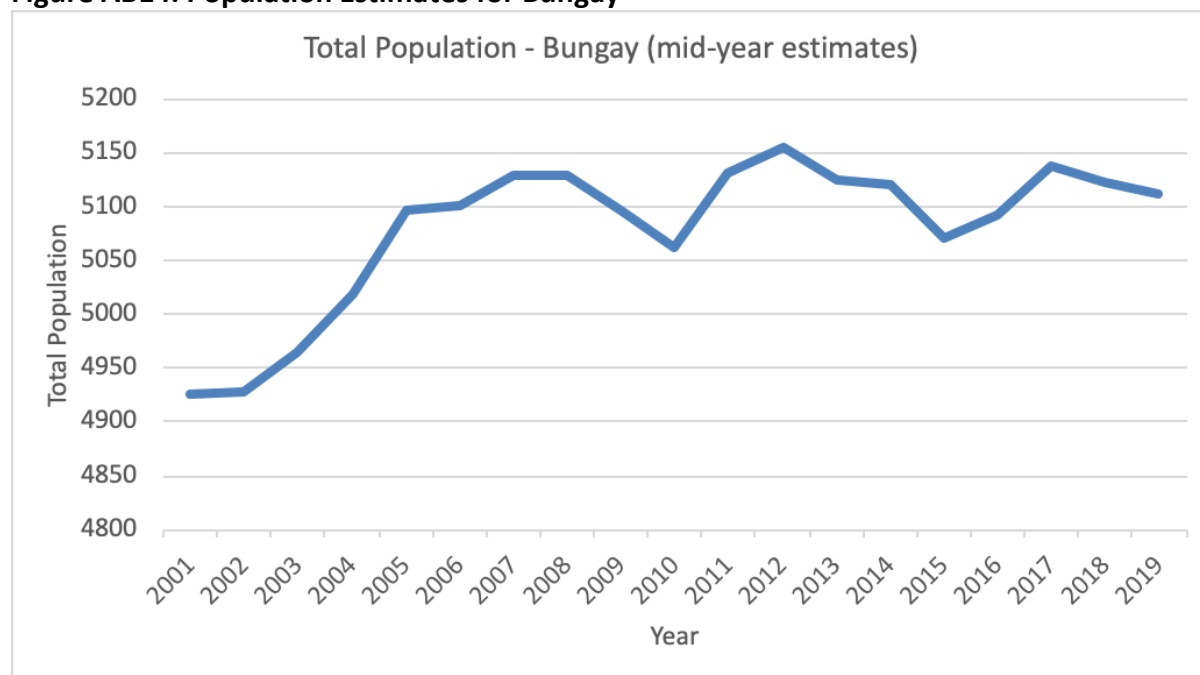
⁸³ <https://www.eastsuffolk.gov.uk/assets/Your-Council/WDC-Council-Meetings/2019/March/Council-20-03-19/Item-11-APPENDIX-A-Waveney-Local-Plan.pdf>

⁸⁴ https://www.broads-authority.gov.uk/_data/assets/pdf_file/0036/259596/Local-Plan-for-the-Broads.pdf

Baseline Review

According to ONS mid-year **population estimates** for 2019, there are currently 5,112 people living within the BNDP area⁸⁵. **Figure AB14** Provides an overview of the estimated population from 2001 to 2019, the population has remained fairly static with only a slight upward trend representing a 4% increase from 2001.

Figure AB14: Population Estimates for Bungay

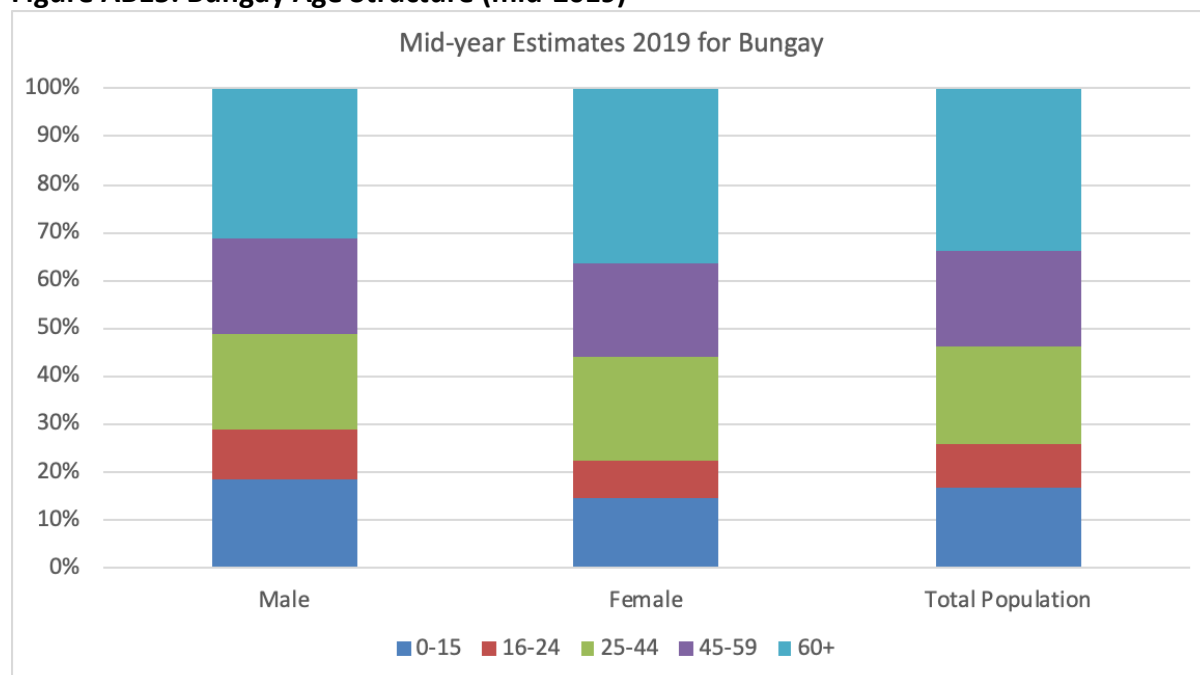


The **age structure** in mid-2019 is provided in **Figure AB15**. Just over a third of residents are aged over 60 years, which is somewhat higher than the England average and Bungay has an ageing population. There is a slight variation by gender, 36% of females are aged 60+ compared to 31% of males who make up a higher proportion of the younger age groups.

In terms of the **housing profile**, according to the latest data (2011 Census), a third of the Bungay's 2,265 dwellings are detached houses or bungalows, and another third semi-detached. The proportion of detached dwellings has reduced since the 2001 Census, with housing development in this period almost exclusively being semi-detached houses or bungalows. Three-bedroom properties are most prominent, 42%, followed by 2-bedroom homes, 29%. The proportion of three bed properties is less than the district average. A third of homes are single person households, which is higher than the district and national average, and over half of these are single people aged 65+. This has increased 30% in Bungay since the 2001 Census. Home ownership sits at around two-thirds, lower than the district average, and 16% of homes are socially rented, which is slightly higher than the district rate of 14%.

⁸⁵ Parish population estimates for mid-2001 to mid-2019 based on best fitting of output areas to parishes.

Online: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/adhocs/12324parishpopulationestimatesformid2001tomid2019basedonbestfittingofoutputareastoparishes>

Figure AB15: Bungay Age Structure (mid-2019)

The **Bungay Housing Needs Assessment (HNA) 2019**⁸⁶, developed by AECOM on behalf of the Bungay Neighbourhood Plan Group provides detailed analysis with respect to tenure, type and size of housing need within the BNDP area. This identifies that for households on lower incomes, the options regarding housing are very limited, and the provision of housing for social rent should be a priority. Given the limited number of smaller dwellings, demographic trends point to not enough supply, and to avoid misalignment, the report recommends 19% of new homes should be one-bedroomed, 42% two bedroomed and 39% three bedroomed.

The **Index of Multiple Deprivation 2019 (IMD)**⁸⁷ is a relative measure of deprivation based on seven different domains, income; employment; education, skills and training; health and disability; crime; barriers to housing and services; and living environment. Deprivation is measured in a broad way to encompass a wide range of aspects of an individual's living conditions, with each of the domains constructed from a basket of measures. The IMD ranks every small area in England from 1 (most deprived) to 32,844 (least deprived).

The BNDP area comprises three of these small areas, Lower Super Output Areas (LSOAs):

- Waveney 013A
- Waveney 013B
- Waveney 013C

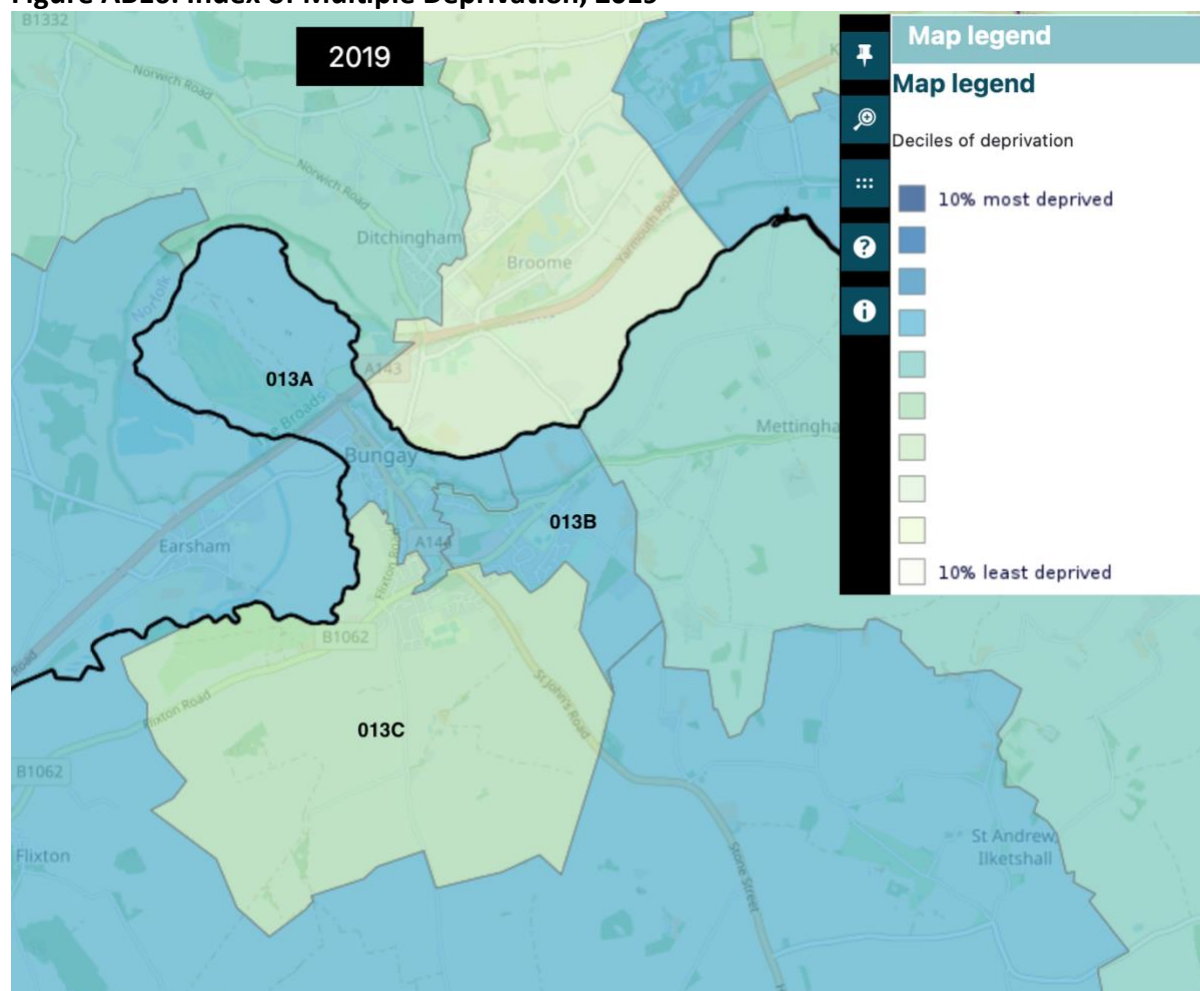
Figure AB16 highlights that two of the areas, 013B and 013A, fall within the 40% most deprived in England whilst 013C falls within the is amongst one of the 50% least deprived neighbourhoods. The areas of highest deprivation are within the built-up area of the town.

⁸⁶ https://www.bungaytowncouncil.gov.uk/docs/NDP/Bungay%20Housing%20Needs%20Assessment_FINALVERSIONdocx.pdf

⁸⁷ <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

Income, employment and education deprivation are highest in LSOA 013B, which falls amongst the 30% most deprived areas for each of those domains. Where income deprivation is relatively high this tends to affect children more than older people. LSOA 013A falls within the 20% most deprived neighbourhoods for the living environment domain which measures both the quality of the indoor and outdoor local environment. All of the areas perform well in relation to the barriers to housing and services and crime domain.

Figure AB16: Index of Multiple Deprivation, 2019



In relation to **health of the population**, the health domain of the IMD measures the risk of premature death and the impairment of quality of life through poor physical and mental health. LSOA 013A and 013B are amongst the 40% most deprived neighbourhoods for this, whilst LSOA 013C is amongst the 50% least deprived.

2011 Census data indicates that 21% of Bungay residents consider themselves to have a limiting long-term illness which limits their day-to-day activities. This is slightly higher than national levels, but similar to Waveney. When asked, 42% of people said that they were in 'very good health' and a further 36% in 'good health'. Almost 2% indicated they were in 'very bad health' and almost 5% in 'bad health'. These figures are very similar to the district average. Around 10% of the population provides some level of unpaid care.

At a local authority level, Public Health England publishes a **health outcomes** framework summary⁸⁸. Data for 2019/20 indicates that Waveney is not significantly different from England for any of the overarching health indicators. Life expectancy is 79.8 years for males and 83.4 years for females, with inequality 9.4y and 7.6y respectively. If you look at wider determinants of health, improvement, prevention and early mortality there are seven areas where Waveney indicators are significantly worse than England. Of note, there are two indicators relating to adult obesity and inactivity and the dementia diagnosis rate. There are 15 areas where the Waveney indicators are significantly better including childhood obesity rates, hospital admissions due to falls and emergency re-admissions within 30 days of discharge from hospital.

Future Baseline

The population overall has only increased slightly over the last 15 years, but with planned development (485 new homes through the current Local Plan and additional growth planned as part of BNDP) this is expected to increase significantly. The town currently has a relatively high proportion of older residents, though this profile may change slightly depending on the type of housing built.

Planned development may also affect the housing profile, with more recent development increasing the stock of semi-detached properties within the area. New development is likely to deliver more affordable housing, which may increase the level homes which are rented.

Key Issues

The population has remained fairly static over the last 18 years, increasing by just 4%. Planned development of almost 500 new homes will result in a more significant increase in population over the next 20 years, which may put pressure on local services and facilities.

Analysis of population and housing in the BNDP area indicates the population is skewed towards an increasingly elderly population and a need for smaller more affordable homes. Choice of housing for those on low incomes is extremely limited, and should new development not result in more affordable housing coming forward, then this may lead to difficulty in retaining young families and a further skew in the population.

Adult obesity and inactivity are a cause for concern across the wider district area, which means they could also be for the BNDP area. Encouraging greater levels of activity including through walking and cycling, and greater access to greenspace is important.

Parts of the BNDP area are relatively deprived in relation to income, employment and the living environment.

Accessibility and Transport

Policy Context

⁸⁸ <https://fingertips.phe.org.uk/static-reports/public-health-outcomes-framework/at-a-glance/E07000206.html?area-name=Waveney>

National Planning Policy Framework (2019)⁸⁹: Development should be delivered in sustainable locations where there is good access to services and facilities and opportunities are taken to create safe, accessible environments with high-quality public spaces. Healthy lifestyles should be supported through provision of green infrastructure, sports facilities, local shops and encourage walking and cycling.

Decarbonising Transport: Setting the Challenge (2020)⁹⁰: This sets a framework for decarbonising transport, to achieve net zero emissions across every mode of transport by 2050. Emphasis is on renewing the road fleet but also creating a modal shift to public transport, walking and cycling and also creating better places to live where people have good access to jobs, health and other services.

The Department for Transport's Cycling and Walking Investment Strategy (2016)⁹¹: This aims to make cycling and walking the natural choice for shorter journeys, or as part of a longer journey. It is recognised that transformative change is required to realise this, and sustained investment in walking and cycling infrastructure will be required alongside behavioural/attitude changes. It sets a strategy across three themes; better safety; better mobility; and better streets.

Suffolk Local Transport Plan 2011-31 (2011)⁹²: This sets a strategy for transport investment over the longer term, with a priority of supporting the growth of business, reducing the demand for car travel, making efficient use of transport networks and improving infrastructure.

East Suffolk Council Waveney Local Plan (2019)⁹³: This sets out requirements for new development which aim to improve the use of sustainable transport options and reduce the risk of congestion. It sets the basic principles of development being located close to and providing safe pedestrian and cycle access to services, being well integrated with existing networks, reducing conflict between different modes and improving public transport in rural areas.

Waveney Cycle Strategy (2016)⁹⁴: This sets out a range of measures to improve the cycle network and encourage people to become more active. WLP8.21 on Sustainable Transport in the East Suffolk Council Waveney Local Plan requires developers to have due regard of and deliver improvements set out within this plan.

Local Plan for the Broads (2019)⁹⁵: Improvements that enable access to facilities, services and settlements within the Broads will be sought in a manner and level which is compatible with sustainability objectives and the special qualities of the Broads. Community facilities

⁸⁹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

⁹⁰https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf

⁹¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/512895/cycling-and-walking-investment-strategy.pdf

⁹²<https://www.suffolk.gov.uk/roads-and-transport/transport-planning/transport-planning-strategy-and-plans/>

⁹³<https://www.eastsuffolk.gov.uk/assets/Your-Council/WDC-Council-Meetings/2019/March/Council-20-03-19/Item-11-APPENDIX-A-Waveney-Local-Plan.pdf>

⁹⁴<https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Waveney-Cycle-Strategy.pdf>

⁹⁵https://www.broads-authority.gov.uk/_data/assets/pdf_file/0036/259596/Local-Plan-for-the-Broads.pdf

and services are seen to support the sustainability of communities and their retention is supported.

Broads integrated access strategy (2019)⁹⁶ sets out how accessibility improvements will be delivered in the Broads to encourage sustainable travel choices, relieve visitor pressure on internationally designated sites and ensure appropriate levels of information on accessing recreational activities.

Baseline Review

In terms of strategic **road connections**, the A143 runs through the BNDP area, just to the north of the town centre. This connects Bungay with Lowestoft and Beccles. The A144 also provides a link to Halesworth in the south, dissecting the town centre. The number of HGVs which use the A144 through the town centre is a longstanding concern. This is recognised by both the business community and East Suffolk Council as impacting on the economy, historic environment and safety of those walking and cycling.

The BNDP area is relatively well served by **buses** and there are a number of routes that run through the town centre, linking it with the surrounding area, including Norwich.

Many **key services** are located in the town centre along Earsham Street, the Market Place and St Mary's Street, and with the town fairly compact there is an opportunity to encourage people to walk or cycle to access these. Parking is also constrained within the town centre, which is identified in the Retail and Leisure Needs Assessment 2016. There are currently 5 council run car parks providing 172 spaces which is the lowest number for a town in the District⁹⁷.

Cycle provision in Bungay is limited. Cycle routes connecting the town centre, residential areas and community facilities consist of indirect routes that are fragmented and difficult to navigate. The built-up area follows a north-south axis with existing cycle routes following corridors that have poor surfaces and are not well overlooked. To reach the town centre it is necessary to cycle along busy roads including St John's Hill and Hillside Road, and at points there are conflicts between people and vehicles, including HGVs. The Waveney Cycle Strategy identifies a number of improvements which can be made to the cycle network to encourage more trips on bike⁹⁸. In terms of long-distance routes, National Cycle Route 1 and Regional Cycle Route 30 link Bungay to Beccles, Harleston and on to Eye.

Figure AB17 highlights the **Public Rights of Way** that runs through the BNDP area. This shows that there is good access into the wider countryside from the main residential areas. Public footpaths are particularly prevalent in the south of the area.

In terms of **travel to work**, most working people who live in the BNDP area do not work in the town. The 2011 Census indicates over 80% of households have access to at least one car or van, and that most travel to work journeys were made by car in 2011. It is recognised

⁹⁶ https://www.broads-authority.gov.uk/data/assets/pdf_file/0020/260822/Appendix-Broads-Integrated-Access-Strategy-and-action-plan.pdf

⁹⁷ Carter Jonas, Waveney District Council: Retail and Leisure Needs Assessment 2016 available online:

<https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Waveney-Retail-and-Leisure-Needs-Assessment-2016.pdf>

⁹⁸ Waveney District Council, Waveney Cycle Strategy – improving the cycle network and encouraging people to become more active, 2016

that the recent pandemic will have affected this considerably, with a significant shift towards homeworking. It is anticipated that new travel patterns will continue to prevail to some extent into the future.

The strategy for Bungay in the East Suffolk Council Waveney Local Plan identifies a range of infrastructure and **local facilities** that should be delivered alongside growth. This includes:

- Extension to the High School playing fields and new bus parking area
- A new pre-school and additional capacity at the primary school
- Expansion of Bungay Medical Centre
- Improved library provision
- A new community centre
- New play parks, football pitch and allotments.

It should be noted in respect to this, a new Community Centre at the rear of the playing field at Old Grammar Lane is nearing completion, and Bungay Medical Centre is no longer considered to require expansion to support growth.

Future Baseline

National investment programmes and future development in the BNDP area is likely to lead to ongoing investment in walking and cycle infrastructure. Existing strategies including the Waveney Cycle Strategy will ensure these are directed in the right place and should enhance accessibility by these modes, encouraging more active travel.

Lasting impacts of the current pandemic on people's travel patterns are anticipated, with the prevalence of home working likely to continue. This may result in more people making use of local services in the town centre.

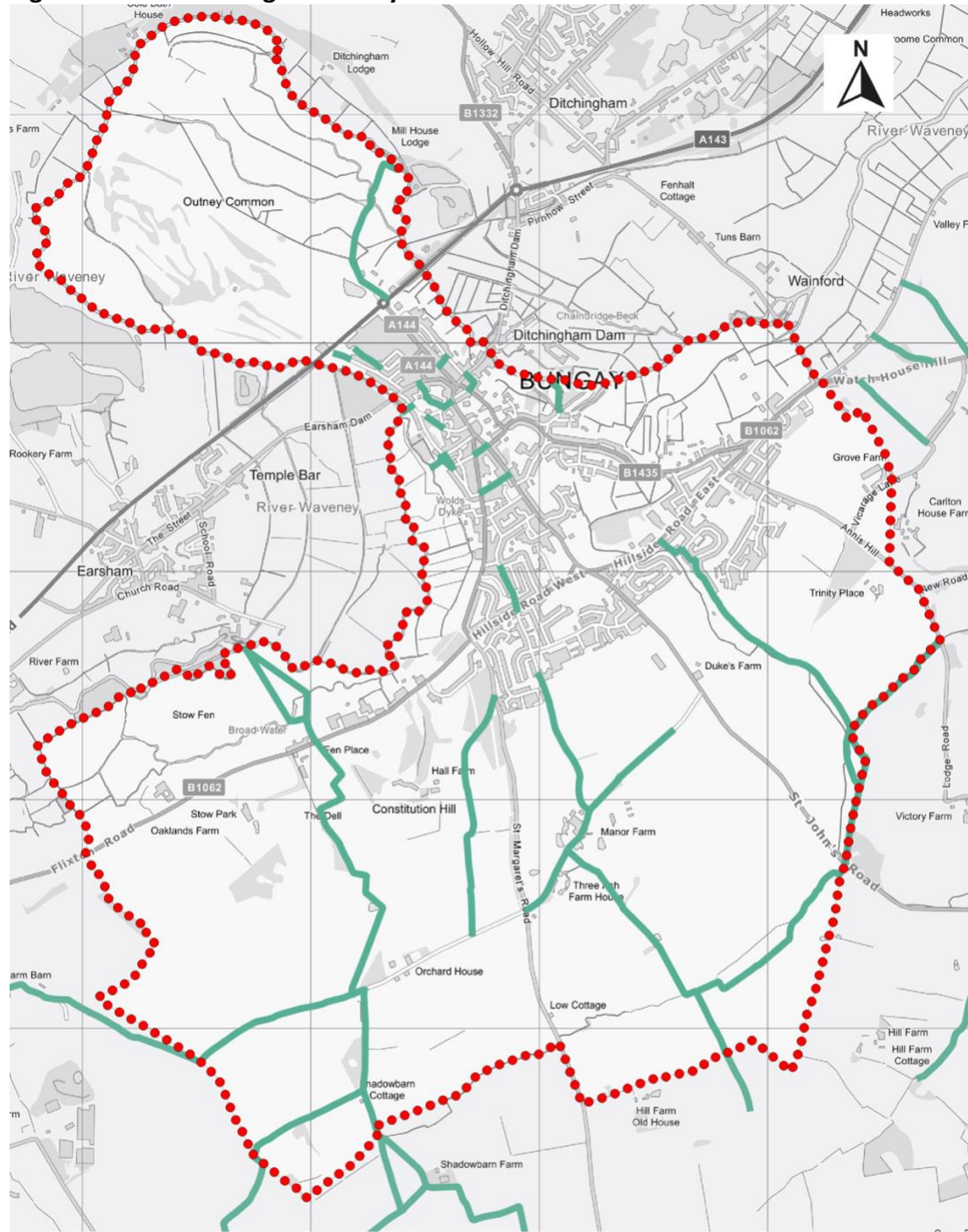
Key Issues

There is a requirement for investment in a range of services and facilities to support sustainable growth within the town. Without this people may need to travel elsewhere to access services and car use could increase.

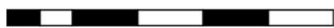
It is possible that future development on the outskirts of the town could result in more people driving into the town centre to access key services and facilities. It is important that there is investment in local infrastructure and services alongside development, and good walking and cycle routes are established that link with the town centre.

The impact of HGVs travelling through the town centre is felt by residents and recognised to impact upon the economy, safety and historic environment.

Figure AB17: Public Rights of Way Network



250 0 250 500 750 1000 m



Scale 1:20,000 at A4

Contains Ordnance Survey data © Crown copyright and database right 2020

 BNDP Area

 Public Rights of Way Network

Appendix C: Policy Assessment against SEA Framework

	H1	H2	H3	H4	CM1	CM2	CM3	CM4	CM5	CH1	CH2	CH3	CH4	TC&E1	TC&E2	TC&E3	ENV1	ENV2	ENV3	ENV4	ENV5	TM1	TM2	TM3	TM4	
Biodiversity																										
Support protection and enhancement of designated sites																										
Deliver more or enhanced open green spaces																										
Create opportunity for improved connectivity between green spaces in the built-up area?																										
Ensure existing open green spaces do not become isolated																										
Protect and enhance areas of priority habitat and ecological connectivity between them																										
Support habitat improvement in line with emerging national requirements for BNG																										
Climate Change																										
Ensure development is directed away from areas at risk of flooding																										
Increase the resilience of the local built or natural environment																										
Improve or extend green infrastructure networks																										
Promote sustainable drainage systems																										
Promote sustainable modes of travel																										
Reduce the need to travel by car																										
Provide infrastructure to support the uptake of low emission vehicles																										
Promote renewable energy sources																										
Increase the level of low carbon or energy efficient homes																										
Landscape																										
Provide an opportunity for greater landscape buffer between the settlement and surrounding rural landscape																										
Protect, increase or enhance access to green infrastructure networks																										
Retain and enhance landscape features that contribute to the setting of the River Waveney and rural setting such as hedgerow and hedgerow trees																										
Water resources, soil and land																										
Avoid impacts on water quality and promote improvements																										
Promote the use of sustainable drainage systems																										
Protect waterbodies from pollution																										
Maximise opportunities for water efficiency																										
Avoid the loss of the best and most versatile agricultural land																										
Promote the use of previously developed or underutilised land																										
Avoid the unnecessary sterilisation of access to mineral resources in the BNDP area																										
Historic Environment																										
Conserve and enhance buildings of architectural or historic interest, including designated heritage assets and their settings																										
Conserve and enhance locally important heritage features																										
Support improved access to and understanding of heritage assets, historic character and its evolution in the BNDP area																										
Enhance the public realm within the town centre																										
Ensure design of any new development retains and enhances the local character and historic distinctiveness of Bungay in line with the Design Guide																										
Population and Health																										
Increase the availability of smaller affordable homes																										
Promote the use of active travel such as walking and cycling																										
Promote recreational activities involving walking and cycling, including access into the wider countryside via public rights of way																										
Provide greater access to green space																										
Enhance accessibility to a range of services including health, leisure and community facilities																										
Avoid negative impacts on existing services and facilities																										
Accessibility and Transport																										
Support delivery of new services and facilities within the town																										
Enhance accessibility to a range of local services and facilities																										
Support retention of existing local services and facilities																										
Promote the use of active travel such as walking and cycling																										
Promote recreational activities involving walking and cycling, including access into the wider countryside																										
Address the impact of motorised transport through the town centre, including HGVs																										

For each policy the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping as a methodological framework. **Green** is used to indicate significant positive effects, whilst **red** is used to indicate significant negative effects. Minor effects are also identified, with **light green** indicating minor positive effects and **amber** indicating minor negative effects. Where appropriate neutral effects (no colour), or uncertainty will also be noted. Uncertainty is noted with **grey** shading.

