

**Framlingham Neighbourhood Plan Group**

# **Framlingham Neighbourhood Plan**

**Sustainability Appraisal Scoping Report  
incorporating Strategic Environmental  
Assessment**

**Final Scoping Report**

**October 2015**



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# 1 INTRODUCTION

1.1 This report represents the Sustainability Appraisal Scoping Report which incorporates the Strategic Environmental Assessment (SEA) of the emerging Framlingham Neighbourhood Plan. It is for consultation with the relevant statutory authorities and other interested stakeholders.

1.2 SEA is a requirement of the EC Directive 2001/42/EC on the assessment of the impacts of certain plans and programmes on the environment. It is implemented in England through the 'Environmental Assessment of Plans and Programmes Regulations 2004'.

1.3 The objective of the 'SEA Directive' is:

*'To provide for a high level of protection to the environment and to contribute to the integration of environmental considerations into the preparation and adoption of the plans...with a view to promoting sustainable development'* (Article 1, Appendix 1)

1.4 The requirement for an SEA emerges from Schedule 10, paragraph 8(2)(f) of the Localism Act which states that a draft Neighbourhood Development Order (or Plan) "meets the basic conditions if the making of the order does not breach, and is otherwise compatible with, EU obligations". In this case, the relevant EU obligations are represented by the SEA Directive.

1.5 This SEA is in accordance with Strategic Environmental Assessment (SEA) Regulations.

## The Scoping Report

1.6 The Scoping Report has been developed in accordance with government guidance for undertaking SEA in compliance with the SEA Directive.

1.7 According to the guidance, the complete process has five stages resulting in the Environmental Report, which should be implemented in turn. Each stage comprises a number of subsidiary tasks, some of which should be implemented alongside each other and lead to the development of a specific output. The Scoping Report is the first stage of the SEA of the Framlingham Neighbourhood Plan associated with it. Stage A explains the process used in this Scoping Report and is presented below in Table 1.1. While the table may infer a sequential process, in practice, stages A1 to A4 inform each other, e.g. one has to have an understanding of the environmental issues (A3) to assess the relevant plans, programmes (A1) and requirements for baseline data collection (A2).

1.8 Consultation on the scope of the SEA is required under the SEA Directive and the Scoping Report guidance detailed above. It is a requirement that the Scoping Report is sent to three statutory Consultation Bodies with environmental responsibilities, as listed:

- The Environment Agency
- Historic England
- Natural England

1.9 The consultation duly undertaken with these bodies sought to:

- ensure the methodology for the proposed SEA/SA is comprehensive to support the Framlingham Neighbourhood Plan;
- provide an opinion on the suitability of the SEA/SA objectives;
- advise on the key sustainability issues as far as they relate to SEA/SA; and

- provide advice to ensure the baseline data is appropriate and sufficient.

**Table 1.1: Work Requirements for the Scoping Report**

<b>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</b>			
<b>Sub-Stage</b>		<b>Tasks</b>	<b>Key Outputs</b>
A1	Identify links to other relevant plans, programmes and sustainability objectives	Defines how the plan is affected by outside factors and suggests ideas for how any constraints can be addressed	Assessment of requirements of SEA/ Collection and evaluation of key datasets
A2	Collect baseline/ environmental data	Provision of an evidence base for sustainability issues, effects prediction and monitoring	
A3	Identify sustainability issues/problems	Used to focus the SEA and streamline the subsequent phases, including baseline information analysis, setting of the SEA Framework, prediction of effects and monitoring	Assessment of requirements of SEA
A4	Developing the SEA framework	A process to enable the sustainability of plan to be appraised	SEA/SA framework consisting of Sustainability Objectives (Table 5.1) based upon National, Regional and Local issues.
A5	Consulting on the scope of the SEA	Carried out with statutory bodies and other relevant organisations with social, environmental or economic responsibilities to ensure the appraisal covers the key sustainability issues	Revisions to Sustainability framework

- 1.10 Consultation was duly undertaken on the draft Scoping Report over a five-week period in July and August 2015 and responses were forthcoming from Historic England, Natural England and the Environment Agency. These are summarised in Table 1.2 below.

**Table 1.2: Responses from statutory bodies on the draft Scoping Report**

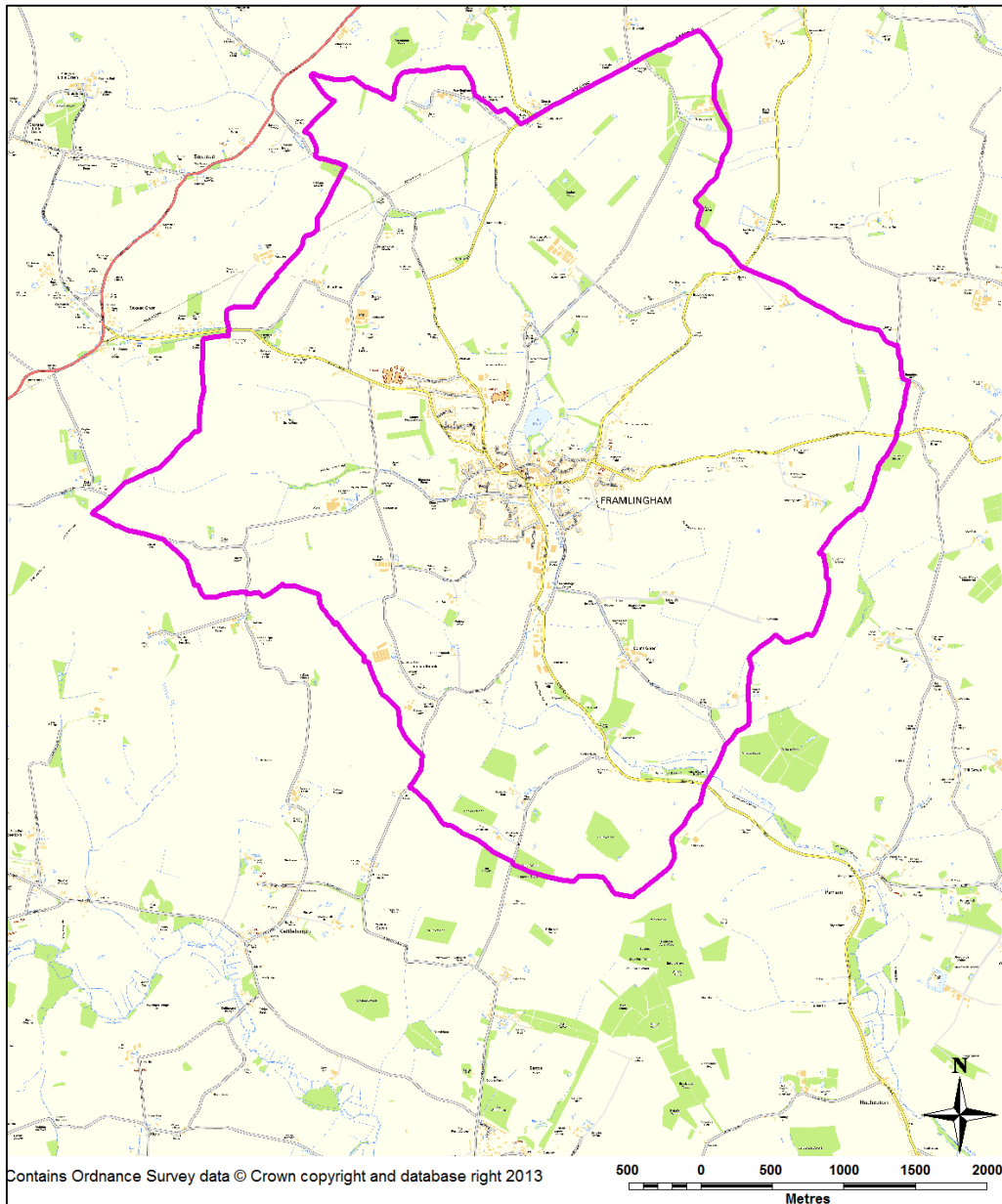
<b>Statutory body and response</b>	<b>How response has been dealt with</b>
<p><b>Historic England:</b></p> <ul style="list-style-type: none"> <li>- No mention is made of paras 66 and 72 of the 1990 Town and Country Planning Act.</li> <li>- No mention is made of non-designated heritage assets including areas of archaeological potential or buildings of local interest such as unlisted positive structures within the conservation area.</li> <li>- Suggest amending 6/Env to ensure it addresses the whole NP area, not just the town.</li> </ul>	<ul style="list-style-type: none"> <li>- This has been added in.</li> <li>- This has been reflected</li> <li>- This was added in.</li> </ul>
<p><b>Environment Agency</b></p> <ul style="list-style-type: none"> <li>- Reflect the draft Anglian River Basin Management Plan and the draft Anglian Flood Risk Management Plan</li> </ul>	<ul style="list-style-type: none"> <li>- These have been added in.</li> </ul>
<p><b>Natural England:</b></p> <ul style="list-style-type: none"> <li>- Specific reference needs to be made to the findings and mitigation measures identified through the Suffolk Coastal Core Strategy Appropriate</li> </ul>	<ul style="list-style-type: none"> <li>- Amendment has been made to 1/Env to reflect the need to consider the wider impact on</li> </ul>

<p>Assessment which was unable to rule out adverse effects on European sites (Sandlings Special Protection Area (SPA), Minsmere-Walberswick SPA/Ramsar site and Minsmere to Walberswick Heaths &amp; Marshes Special Area of Conservation (SAC)) through increased recreational disturbance as a result of in-combination housing development in the market towns east of Ipswich, including Framlingham.</p>	<p>European designated sites. The cumulative impact of development, including that granted planning permission at Fairfield Road, has also been considered in Section 8.</p>
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## Framlingham Neighbourhood Plan

- 1.11 The Framlingham Neighbourhood Plan area is shown in Figure 1.1 and is contiguous with the parish boundary.

**Figure 1.1: Framlingham Neighbourhood Plan designated area**



- 1.12 The Framlingham Neighbourhood Plan is being developed through an extensive programme of engagement with the local community. The primary settlement in the parish is Framlingham town with the majority of the population living within its limits. Therefore the focus of the plan has been on addressing the needs of the community that live within the town.
- 1.13 The Neighbourhood Plan has been produced by local residents, with the support of Framlingham Town Council although an independent Neighbourhood Plan Steering Group has driven the Plan forward. The Plan provides a vision for the development of the town and parish up to 2030:

*"In 2030, Framlingham continues to be a prosperous parish with a thriving and vibrant market town at its heart which meets the needs of the residents of the town, the inhabitants of the villages it serves and tourists alike.*

*The range and scale of the retail outlets, services and activities has been expanded so that residents are now able to access these locally and sustainably reducing the need to travel outside the parish.*

*Framlingham has re-established itself as a local transport hub linking to adjacent villages, other local transport hubs, such as Saxmundham Wickham Market Station, and to Ipswich as its main centre.*

*The town and key services are safely accessible to all pedestrians, cyclists, mobility scooters and wheelchair users.*

*The town has a central 'town owned' and managed community centre which also accommodates community support, tourist and Town Council offices.*

*The extended scale and range of employment that has been developed allows more of the towns' inhabitants to work within walking/cycling distance of where they live.*

*The health and wellbeing of the population has been enhanced by an extended access to daytime leisure and exercise provision, delivered locally, supported and resourced by the District, and increased access to medical facilities.*

*The green environment has been further extended and enhanced, framing all new developments in managed 'green' spaces. This has served to increase levels of biodiversity and has ensured the adequate protection of sensitive areas.*

*The capacity of local schools is appropriate to accommodate all local children and young people who require a place.. 'Education for life' principles are also now strongly promoted through a coordinated 'education and training' offer for all ages delivered locally.*

*New housing developments have been built in the style of the conservation area buildings and provide a rebalanced range of dwellings to suit the needs of all the population.*



*All new housing developments have been phased over the plan period and have ensured that necessary improvements to infrastructure have been made that have provided wider benefits to the existing local community."*

1.14 In order to deliver the vision, the Plan sets out to meet a series of objectives under particular themes:

- Retail
  - Support a balanced range of retail and financial service outlets for residents, local villages and tourists. Most food and essential items should be obtainable from within the retail centre of town.
  - To extend the range and scope of retail experience within the town centre.
  - Extend the number and range of stalls on the present market days or extend the number of market days and the range of markets offered.
- Tourism
  - To protect, manage, enhance and expand the tourist experience in Framlingham and provide a greater range and scope of tourist accommodation and facilities.
- Employment
  - To maintain and encourage further service industries within the town centre.
  - Allocate parcels of land for the development of small business and light industry within the town boundary and preferably within a walking or cycling distance of where residents live.
  - To encourage the generation of renewable energy using small scale schemes contributing to the local economy and ensuring these do not spoil residents' views.
  - Encourage industries associated with agriculture, financial services, land based enterprises, design, food, energy generation, arts and crafts, and tourism.
  - Support the Business Association in building working relationships with education providers, in order to develop local training and apprenticeship opportunities.
- Travel and Transport
  - To re-establish Framlingham as a 'transport hub', with links to other local hubs and adjacent villages.
  - To provide safe, accessible pedestrian, cycling, mobility scooter, wheelchair, access to all health services, education facilities, town centre retail outlets from all housing developments, thereby reducing car usage.
  - To examine the traffic flow through town and work with the District, County and developers to achieve a whole-town solution to traffic management.
  - To address the need for both resident and visitor parking , seeking to create sufficient capacity for demand; through proactive influence of developer plans (ensuring appropriate parking spaces are provided); identification of new space within walking distance of town centre; and suitable coach parking to support tourist industry and economic prosperity of town.

- Community provision
  - To provide public toilet facilities to meet the needs of the growing community, including on the Pageant field. All new public facilities such as the central community town hall, car parks or new play spaces should have access to public toilet facilities.
  - To work with partners, including the district and County Councils to identify a site/location for a central 'town owned' community centre, with a hall sufficient to accommodate 200 seated, meeting rooms, Town Council offices, community support and tourist offices.
  - To secure District financial support for current and extended leisure service provision in the town.
  - To improve access to all facilities available through a coordinated booking system for the town.
  - To encourage volunteer groups and organisations that have similar interests to work together and not duplicate their efforts.
- Housing
  - To identify, in partnership with the District and the Land Allocations process, suitable sites for potential housing, business and industrial use as required to deliver on the objectives expressed within the Neighbourhood Plan.
  - To work with partners in the District and County and with developers to secure sufficient infrastructure investment to support new housing development, existing residents and the needs of visitors.
  - To influence developer plans to ensure that all housing has appropriate parking allocations.
  - To influence developer plans to ensure appropriate types of dwellings and layout of new housing are proposed.
  - To work with developers (as well as responding to any housing development proposals) to promote cycling and walking routes. Work with the County to establish cycle and walk ways as standard throughout the town to minimise car use.
- Waste and renewables
  - To develop town specific schemes for recycling that ensures returns invested back into the local community
  - To explore the potential of using waste to provide energy or income for the town
  - To influence new housing and business developments at the informative stage, to ensure appropriate provision is made for waste management and due consideration given to potential for recycling within the development.
  - To ensure adequate and conveniently sited recycling facilities for current residents.
- Green space
  - To create new 'green' spaces around and within new developments to encourage biodiversity, provide green walkways/cycle paths, space for recreation, to frame and screen development.
  - To maintain, enhance and protect all existing identified green spaces.

- To protect the iconic views of the town from the outskirts, on the entrances to town, through the town buildings and through new developments.
- To review the existing town boundary and redraw it to take into account development over the next 15 years and impact on current residential housing.
- To review the existing conservation area and look for ways we might 'positively' develop and enhance the area to benefit residents and the tourist experience.
- Community infrastructure – health and wellbeing
  - Identify suitable land/site allocation for the expansion of health services within the town boundary
  - To provide and promote a centrally coordinated system for booking all sporting and leisure facilities within the town, so that more people can access the amenities
  - Work with the district to establish day time access to sports and leisure facilities for the community
  - Work with the County to secure appropriate transport services for local hospitals from the Town.
  - Ensure that footpaths are improved and there is investment in cycle routes to enable safe cycling through and around the town and schools.
- Community infrastructure – Education
  - To work with partners to ensure there are sufficient places available in local schools for all local young people requiring a mainstream place.
  - To work with the County Council to identify a suitable site(s), within the town boundary, for the current and growing demands for primary places in education.
  - To seek to establish an Education Zone capable of offering education and training opportunities for all ages within the town ('education for life') including community education.
  - Improved cycle and walk ways to work towards a reduction in vehicle usage to schools.
  - Development of increased community use of the buildings, supported by the District, to benefit the local community.
- Community infrastructure – Youth
  - Work with youth organisations, schools and young people to develop youth provision, including the potential of a dedicated youth centre.
  - Explore the potential of creating within an Education Zone new opportunities for both Further and higher Education courses and training to be offered locally.
  - Improved coordination with local businesses and employers to create more opportunities for training and skills development.

1.15 Each of the objectives is presented in Table 1.3 below and is assessed against the strategic objectives of the Suffolk Coastal District Local Plan to establish whether there are any conflicts.

**Table 1.3: Objectives of the Framlingham Neighbourhood Plan compared to the strategic objectives of the Suffolk Coastal District Local Plan**

Neighbourhood Plan Objectives	District Local Plan Strategic Objectives
<p>Support a balanced range of retail and financial service outlets for residents, local villages and tourists. Most food and essential items should be obtainable from within the retail centre of town.</p> <p>To extend the range and scope of retail experience within the town centre.</p> <p>Extend the number and range of stalls on the present market days or extend the number of market days and the range of markets offered.</p>	<p>To deliver sustainable communities through better integrated and sustainable patterns of land use, movement, activity and development.</p> <p>To sustain and enhance the vitality and viability of Felixstowe and the market towns (Aldeburgh, Framlingham, Leiston, Saxmundham and Woodbridge) as retail, service, and employment centres serving their local populations and that of their neighbouring rural communities.</p> <p>To promote better access to, housing, employment, services and facilities for every member of the community.</p>
<p>To protect, manage, enhance and expand the tourist experience in Framlingham and provide a greater range and scope of tourist accommodation and facilities.</p>	<p>To promote all year round tourism based on the environmental, cultural and social attributes of the area.</p>
<p>To maintain and encourage further service industries within the town centre.</p> <p>Allocate parcels of land for the development of small business and light industry within the town boundary and preferably within a walking or cycling distance of where residents live.</p> <p>To encourage the generation of renewable energy using small scale schemes contributing to the local economy and ensuring these do not spoil residents' views.</p> <p>Encourage industries associated with agriculture, financial services, land based enterprises, design, food, energy generation, arts and crafts, and tourism.</p> <p>Support the Business Association in building working relationships with education providers, in order to develop local training and apprenticeship opportunities.</p>	<p>To deliver sustainable communities through better integrated and sustainable patterns of land use, movement, activity and development.</p> <p>To sustain and enhance the vitality and viability of Felixstowe and the market towns (Aldeburgh, Framlingham, Leiston, Saxmundham and Woodbridge) as retail, service, and employment centres serving their local populations and that of their neighbouring rural communities.</p> <p>To promote better access to, housing, employment, services and facilities for every member of the community.</p> <p>To support the growth and regeneration of the local economy and to build on those elements of its unique economic profile that are identified as being of sub-regional, regional and national significance.</p> <p>To sustain, strengthen and diversify the rural economy.</p>

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Neighbourhood Plan Objectives	District Local Plan Strategic Objectives
<p>To re-establish Framlingham as a 'transport hub', with links to other local hubs and adjacent villages.</p> <p>To provide safe, accessible pedestrian, cycling, mobility scooter, wheelchair, access to all health services, education facilities, town centre retail outlets from all housing developments, thereby reducing car usage.</p> <p>To examine the traffic flow through town and work with the District and County to achieve a whole-town solution to traffic management.</p> <p>To address the need for both resident and visitor parking, seeking to create sufficient capacity for demand; through proactive influence of developer plans (ensuring appropriate parking spaces are provided); identification of new space within walking distance of town centre; and suitable coach parking to support tourist industry and economic prosperity of town.</p>	<p>To deliver sustainable communities through better integrated and sustainable patterns of land use, movement, activity and development.</p> <p>To sustain and enhance the vitality and viability of Felixstowe and the market towns (Aldeburgh, Framlingham, Leiston, Saxmundham and Woodbridge) as retail, service, and employment centres serving their local populations and that of their neighbouring rural communities.</p> <p>To promote better access to, housing, employment, services and facilities for every member of the community.</p> <p>To enhance the transport network across the district</p> <p>To ensure that, as a priority, adequate infrastructure such as transport, utilities or community facilities are provided at an appropriate time, in order to address current deficiencies and meet the needs of new development.</p>
<p>To provide public toilet facilities to meet the needs of the growing community, including on the Pageant field. All new public facilities such as the central community town hall, car parks or new play spaces should have access to public toilet facilities.</p> <p>To work with partners, including the district and County Councils to identify a site/location for a central 'town owned' community centre, with a hall sufficient to accommodate 200 seated, a meeting rooms, Town Council offices, community support and tourist offices.</p> <p>To secure District financial support for current and extended leisure service provision in the town.</p> <p>To improve access to all facilities available through a coordinated booking system for the town.</p> <p>To encourage volunteer groups and organisations that have similar interests to work together and not duplicate their efforts.</p>	<p>To deliver sustainable communities through better integrated and sustainable patterns of land use, movement, activity and development.</p> <p>To promote better access to, housing, employment, services and facilities for every member of the community.</p> <p>To encourage and enable the community to live and enjoy a healthy lifestyle; to promote urban cooling (e.g. shading from trees, canopies on buildings to cool down areas and buildings in urban settings) in major settlements as well as support biodiversity and geodiversity.</p>

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Neighbourhood Plan Objectives	District Local Plan Strategic Objectives
<p>To identify, in partnership with the District and the Land Allocations process, suitable sites for potential housing, business and industrial use as required to deliver on the objectives expressed within the Neighbourhood Plan.</p> <p>To work with partners in the District and County to secure sufficient infrastructure investment to support new housing development, existing residents and the needs of visitors.</p> <p>To influence developer plans to ensure that all housing has appropriate parking allocations.</p> <p>To work with developers (as well as responding to any housing development proposals) to promote cycling and walking routes. Work with the County to establish cycle and walk ways as standard throughout the town to minimise car use.</p>	<p>To deliver sustainable communities through better integrated and sustainable patterns of land use, movement, activity and development.</p> <p>To meet the minimum locally identified housing needs of the district for the period 2010 to 2027, taking into account existing and future economic, environmental and social opportunities and constraints.</p> <p>To provide for the full range of types and locations of new homes to meet the needs of existing and future residents of the district.</p> <p>To sustain and enhance the vitality and viability of Felixstowe and the market towns (Aldeburgh, Framlingham, Leiston, Saxmundham and Woodbridge) as retail, service, and employment centres serving their local populations and that of their neighbouring rural communities.</p> <p>To promote better access to, housing, employment, services and facilities for every member of the community.</p>
<p>To develop town specific schemes for recycling that ensures returns invested back into the local community</p> <p>To explore the potential of using waste to provide energy or income for the town</p> <p>To influence new housing and business developments at the informative stage, to ensure appropriate provision is made for waste management and due consideration given to potential for recycling within the development.</p>	<p>To adapt to and mitigate against, the potential effects of climate change, and minimise the factors which contribute towards the problem.</p>
<p>To create new 'green' spaces around and within new developments to encourage biodiversity, provide green walkways/cycle paths, space for recreation, to frame and screen development.</p> <p>To maintain, enhance and protect all existing identified green spaces.</p> <p>To protect the iconic views of the town from the outskirts, on the entrances to town, through the town buildings and through new developments.</p>	<p>To deliver sustainable communities through better integrated and sustainable patterns of land use, movement, activity and development.</p> <p>To encourage and enable the community to live and enjoy a healthy lifestyle; to promote urban cooling (e.g. shading from trees, canopies on buildings to cool down areas and buildings in urban settings) in major settlements as well as support biodiversity and geodiversity.</p>

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Neighbourhood Plan Objectives	District Local Plan Strategic Objectives
<p>To review the existing town boundary and redraw it to take into account development over the next 15 years and impact on current residential housing.</p> <p>To review the existing conservation area and look for ways we might 'positively' develop and enhance the area to benefit residents and the tourist experience.</p>	<p>To conserve and enhance the quality of the distinctive natural, historic and built environments including ensuring that new development does not give rise to issues of coalescence.</p>
<p>Identify suitable land/site allocation for the expansion of health services within the town boundary</p> <p>Centrally coordinated system for booking all sporting and leisure facilities within the town, so that more people can access the amenities</p> <p>Work with the district to establish day time access to sports and leisure facilities for the community</p> <p>Work with the County to secure appropriate transport services for local hospitals from the Town.</p> <p>Ensure that footpaths are improved and there is investment in cycle routes to enable safe cycling through and around the town and schools.</p>	<p>To deliver sustainable communities through better integrated and sustainable patterns of land use, movement, activity and development.</p> <p>To ensure that, as a priority, adequate infrastructure such as transport, utilities or community facilities are provided at an appropriate time, in order to address current deficiencies and meet the needs of new development.</p> <p>To encourage and enable the community to live and enjoy a healthy lifestyle; to promote urban cooling (e.g. shading from trees, canopies on buildings to cool down areas and buildings in urban settings) in major settlements as well as support biodiversity and geodiversity.</p>
<p>To work with partners to ensure there are sufficient places available in local schools for all local young people requiring a mainstream place.</p> <p>To work with the County Council to identify a suitable site(s), within the town boundary, for the current and growing demands for primary places in education.</p> <p>To seek to establish an Education Zone capable of offering education and training opportunities for all ages within the town ('education for life') including community education.</p> <p>Improved cycle and walk ways to work towards a reduction in vehicle usage to schools.</p>	<p>To deliver sustainable communities through better integrated and sustainable patterns of land use, movement, activity and development.</p> <p>To ensure that, as a priority, adequate infrastructure such as transport, utilities or community facilities are provided at an appropriate time, in order to address current deficiencies and meet the needs of new development.</p>

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Neighbourhood Plan Objectives	District Local Plan Strategic Objectives
Development of increased community use of the buildings, supported by the District, to benefit the local community.	
Work with youth organisations, schools and young people to develop youth provision, including the potential of a dedicated youth centre.  Explore the potential of creating within an Education Zone new opportunities for both Further and higher Education courses and training to be offered locally.  Improved coordination with local businesses and employers to create more opportunities for training and skills development.	To promote better access to, housing, employment, services and facilities for every member of the community.
<i>Matters not directly addressed by the Neighbourhood Plan objectives</i>	<i>To deliver high quality developments based on the principles of good, sustainable and inclusive design.  To secure the continuing prosperity and qualities of coastal areas and communities, whilst responding to climate change and the natural processes that occur along the coast.</i>



- 1.16 The assessment in Table 1.3 is also relevant information informing Stage A1 of the SA Scoping process.

### **Approach to engagement**

- 1.17 It is recognised that the approach to engagement is vital to a successful plan. The community of Framlingham parish – including its residents and businesses – must be able to properly input into the ongoing process of developing the vision and objectives, considering options and then establishing the preferred set of options that make up the draft Neighbourhood Plan.
- 1.18 In order to develop the Neighbourhood Plan, Framlingham Town Council set up a Neighbourhood Plan team which comprises Town Councillors and a number of local volunteers. This team has put together a programme of engagement activities which has ensured that the community has the opportunity to input at every stage. This it has done using a range of methods:
- Using a Framlingham Neighbourhood Plan website ([http://www.framlingham.com/neighbourhood\\_plan.php](http://www.framlingham.com/neighbourhood_plan.php)) as a central hub for information.
  - Using local newsletters and newspapers to notify people of upcoming events.
  - Running engagement events, both as drop-in events and specific workshops.
  - Regularly engaging with key stakeholders, including landowners.
  - Reporting back on the outcomes of key activities so that the community is able to understand the progress being made.
- 1.19 All policies and site allocations will be consulted on with the community and, subject to the assessments undertaken in the SA, ultimately it is their views which will shape the decisions made on the final wording of policies and the sites that are allocated, demonstrating that reasonable alternatives have been taken into consideration. In doing so, it is vital that the community understands that the Neighbourhood Plan must comply with the Basic Conditions and therefore there are certain factors which need to be taken into consideration when given their views on policies and sites. The Neighbourhood Plan team is using consultant support to advise on the best approach which ensures that the community is fully informed when being asked to engage on a particular matter and shape its outcome.

## 2 RELEVANT PLANS, PROGRAMMES AND SUSTAINABILITY OBJECTIVES (STAGE A1)

2.1 This section provides a summary review of the policy context relevant for the Neighbourhood Plan. Starting at the international level and working down in scale this covers the key policies that the Neighbourhood Plan should adhere to or consider. While it is common sense to ensure the Plan and SEA/SA reviews these requirements, it is also a requirement of the SEA Directive which states that the Environmental Report should include:

*"an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes"*

*"the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation"*

[Annex 1(a) and (e) of the SEA Directive]

2.2 Within this context it is stated in the NPPF that work for Neighbourhood Planning is proportionate with the scale and ambitions of the plan. We have therefore considered a range of relevant policies and plans for this assessment considering international, national, regional (East of England), and local (County and District) plans and policies.

### International context

Key objectives	Key targets/indicators	Key implications for NP and SEA
<b>EU Habitats and Conservation of Wild Birds Directives (92/43/EEC and 79/409/EEC)</b>		
To conserve fauna and flora and natural habitats of EU importance by the establishment of a network of protected areas throughout the European Community. This was designed to maintain both the distribution and abundance of threatened species and habitats.	Identifies endangered habitats and species requiring protection and need for re-establishment of denuded biotopes. Protected areas should be created, maintained and managed.	Plans should take account relevant SPA and SAC sites. If negative impacts are anticipated appropriate assessments should be undertaken. Above protecting the integrity and interest of European sites, the NP should consider objectives to protect and if possible, enhance biodiversity.
<b>EU Water Framework Directive (2000/60/EC)</b>		
To expand the scope of water protection to all waters, surface waters and groundwater. <ul style="list-style-type: none"> <li>• Achieve 'good status' for all waters by 2015.</li> <li>• Water management should be based on river basins and a 'combined approach' of emission</li> </ul>	Prevent deterioration in the status of aquatic ecosystems, provide protection and improve ecological condition: <ul style="list-style-type: none"> <li>• achieve at least good status for all water bodies by 2015 (or later subject to specific criteria).</li> <li>• meet the requirements of WFD protected areas</li> </ul>	Plan should consider any significant hydrological / hydrogeological factors and ensure integration with existing catchment management plans. Plan should consider including objectives to protect and enhance water

Key objectives	Key targets/indicators	Key implications for NP and SEA
limit values and quality standards. <ul style="list-style-type: none"> <li>Water management should include the closer involvement of community.</li> </ul>	<ul style="list-style-type: none"> <li>promote sustainable use of water</li> <li>conserve habitats and species that depend directly on water</li> <li>progressively reduce or phase out pollutants that pose significant threats to the aquatic environment / groundwater</li> <li>help mitigate the impacts of floods and droughts.</li> </ul>	resources, quality and ecological function.
<b>EU Air Quality Directive (2008/50/EC)</b>		
Establishes limit values and alert thresholds for concentrations of key pollutants in ambient air including sulphur dioxide, nitrogen dioxide / oxides of nitrogen, particulates. Maintain ambient air quality in areas where it is good and improve it in others.	Sets limit values and alert thresholds for concentrations of sulphur dioxide, nitrogen dioxide and oxides of nitrogen, particulate matter and lead.	Plan should consider (where relevant) the levels of sulphur dioxide, nitrogen dioxide and oxides of nitrogen, particulate matter and lead in ambient air. Plan should consider maintaining ambient air quality and including objectives with the aim of reducing air pollution and, where possible, enhancing air quality in respect of key pollutants.

## National and regional context

- 2.3 In this section we summarise the most relevant regional and local plans and policies making the assumption that these include the relevant international and national sustainability objectives.
- 2.4 The Planning system is undergoing a period of change following the introduction of the Localism Act 2011 and the National Planning Policy Framework (NPPF) in 2012.
- 2.5 This has heralded significant changes including to the planning system and provides a greater emphasis on localism. European Regulations still apply as does much of the legacy planning guidance – until it is revised for the NPPF.
- 2.6 The NPPF stresses the importance of sustainability running as a ‘golden thread’ throughout plans and policies.

Key objectives	Key targets/indicators	Key implications for NP and SEA
<b>National Planning Policy Framework (March 2012)</b>		
Planning should drive and support sustainable economic development. It should:	Supports local and national targets with regard to biodiversity and geodiversity.	Plan should contribute to the objective of achieving

Key objectives	Key targets/indicators	Key implications for NP and SEA
<ul style="list-style-type: none"> <li>• secure high quality design and good standard of amenity</li> <li>• take account of the different roles of areas, recognising the intrinsic character and beauty of the countryside</li> <li>• support transition to a low carbon future in a changing climate, taking account of flood risk and encourage the reuse of existing resources and encouraging the use of renewable resources.</li> <li>• contribute to conserving and enhancing the natural environment and reducing pollution.</li> <li>• encourage the effective use of land by reusing land that has been previously developed.</li> <li>• conserve heritage assets in a manner appropriate to their significance.</li> <li>• focus significant development in locations which are, or can be made sustainable.</li> </ul> <p>Paragraph 17: “...planning should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.”</p> <p>Paragraph 132: “When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.</p>		<p>sustainable development (social, economic and environmental). SA Objectives should reflect the core planning principles and policies set out in the NPPF. The Plan should:</p> <ul style="list-style-type: none"> <li>• contribute to minimising impacts and providing net gains in biodiversity where possible</li> <li>• contribute to the Government’s commitment to halt the overall decline in biodiversity – including by establishing coherent ecological networks that are more resilient to current and future pressures.</li> </ul> <p>Plan should contribute to the conservation, and where appropriate, enhancement of the historic environment.</p> <p>The Plan should ensure that development does not have a detrimental impact on any heritage assets and should seek to ensure that development actively conserves the asset.</p>

Key objectives	Key targets/indicators	Key implications for NP and SEA
<b>1990 Town and Country Planning Act</b>		
<p>Section 66: Requires special regard for the desirability of preserving listed buildings and their settings.</p> <p>Section 72: Special attention to be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.</p>		<p>The NP must ensure that the listed buildings and their settings are not affected by proposed development.</p> <p>The NP should consider policies to preserve and enhance the character of conservation areas.</p>
<b>The Waste (England &amp; Wales) Regulations 2011</b>		
<p>To encourage/ensure waste arises/is dealt with further up the waste hierarchy. Divert waste disposal away from landfill.</p>	<p>Target of 50% of household waste to be recycled.</p>	<p>Plan must have regard to the amended waste hierarchy. Policies and objectives should where possible encourage waste to be re-used, recycled or have value / energy recovery. If possible the Plan should discourage landfilling of waste.</p>

Key objectives	Key targets/indicators	Key implications for NP and SEA
<b>UK Climate Change Act 2008</b>		
The Act introduced a statutory target for reducing carbon emissions.	Target of reducing carbon emissions by 80 per cent below 1990 levels by 2050, with an interim target of 34% by 2020.	Planning can make a contribution to mitigating and adapting to climate change by influencing the location, scale and character of development. The plan should include policies / objectives that contribute towards achieving lower carbon emissions and greater resilience to the impacts of climate change.
<b>Flood and Water Management Act 2010</b>		
Improve the management of flood risk for people, homes and businesses. To protect water supplies.	Local Authorities to prepare flood risk assessments, flood maps and plans. EA to prepare Local flood risk management strategies.	Plan should take account of flooding and water management issues and strategies and consider the inclusion of policies / objectives to reduce flood risks and other impacts on the water environment.
<b>Carbon Plan: Delivering our low carbon future 2011</b>		
Government-wide plan for action on climate change at domestic and international levels.	Includes a range of sector-based plans and targets for low carbon: <ul style="list-style-type: none"> <li>• building</li> <li>• transport</li> <li>• industry</li> <li>• electricity</li> <li>• agriculture, land use, forestry and waste</li> </ul>	The Plan should include policies / objectives that contribute towards achieving lower carbon emissions.
<b>Mainstreaming sustainable development 2011</b>		
This refreshed vision builds upon the principles that underpinned the UK's 2005 SD strategy, recognising the needs of the economy, society and the natural environment, alongside the use of good governance and sound science.	Promises a new set of indicators from DEFRA that link initiatives and include wellbeing.	Plan should take account of climate change and promote sustainability through sustainable, low carbon and green economic growth.
<b>The East of England Biodiversity Delivery Plan (East of England Biodiversity Forum)</b>		
Provides a coherent vision to safeguard and enhance the regions biodiversity and wildlife. Embed a landscape scale approach to restoring whole ecosystems in the working practices and policies of all partners. Create the space needed for wildlife to respond to climate change. Enable all organisations in the East of England to support and improve biodiversity.	Provides a framework for the delivery of biodiversity targets through biodiversity opportunity areas and habitat and species targets.	The NP should consider objectives to protect and where possible, enhance biodiversity.

Key objectives	Key targets/indicators	Key implications for NP and SEA
<b>Anglian River Basin Management Plan</b>		
Prepared under the Water Framework Directive, the plan is about the pressures facing the water environment in the Anglian River Basin District and the actions that will address them.	By 2015, 18% of surface waters (rivers, lakes, estuaries and coastal waters) are going to improve for at least one biological, chemical or physical element. By 2015, 23% of surface waters will be at good or better ecological status/potential and 33% of groundwater bodies will be at good status. In combination 23% of all water bodies will be at good status by 2015. At least 47% of assessed surface waters will be at good or better biological status by 2015.	The NP needs to consider the impact of proposed development on water quality.
<b>Anglian draft Flood Risk Management Plan</b>		
To set out where and how to manage flood risk to provide most benefit to communities and the environment.		

## County/local context

- 2.7 Suffolk County Council prepares statutory land use plans for waste and minerals policy. In March 2011, Suffolk County Council adopted a Waste Core Strategy which covers the period to 2026 and is the most up-to-date statement of the Authority's land-use planning policy for waste.
- 2.8 A key element of the plan is the aspiration to have ended the landfilling of untreated municipal, commercial and industrial wastes.

Key objectives	Key targets/indicators	Key implications for Neighbourhood Plan and Sustainability Appraisal
<b>Suffolk Local Transport Plan 2011-2031</b>		
To ensure that transport investment supports the economic and business growth strategies in the county.	Indicators include: congestion, mode of travel to work and school, cycling trips, accessibility, road traffic accidents, road and footway maintenance, street lighting, highway structures, road flooding, air quality and transport emissions.	The Plan should consider policies / objectives which contribute to transport sustainability. This should go beyond reducing carbon emissions to include economic growth, safety, pollution, traffic reduction and access to services.
<b>Suffolk Waste Core Strategy 2011</b>		
By 2026, the landfilling of untreated municipal, commercial & industrial wastes	To only make provision for a declining amount of landfill	The Plan should consider how, within the context of a

Key objectives	Key targets/indicators	Key implications for Neighbourhood Plan and Sustainability Appraisal
will have ceased and residual waste management processes will be fully operational, recovering value from wastes that cannot practicably be recycled or composted.	over the plan period with 'zero waste to landfill' by 2026.	growing population in Framlingham, waste generation can be minimised and it can be ensured that Framlingham contributes towards the target of zero waste to landfill.
<b>Suffolk Biodiversity Action Plan</b>		
Maintain and, where practicable, enhance the wildlife and habitats that provide the natural character and diversity of Suffolk <ul style="list-style-type: none"> <li>• To ensure lawful compliance towards biodiversity in planning decisions.</li> <li>• To promote best practice and provide support to planners on biodiversity issues.</li> <li>• To ensure the planning system contributes to the Natural Environment White Paper 2011 objective of no net loss of biodiversity as part of sustainable development.</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure development avoids adverse impacts on biodiversity</li> <li>• Where avoidance is not possible, mitigate residual impacts of developments.</li> <li>• Where mitigation is not possible, compensate for losses incurred during development.</li> <li>• Enhance developments for biodiversity.</li> <li>• Ensure biodiversity is taken into consideration during, and after, the construction phase of development.</li> </ul>	Plan should consider policies / objectives to enhance (where possible) the wildlife and habitats that give rise to Suffolk's natural character and diversity.
<b>Suffolk Coastal and Waveney Strategic Flood Risk Assessment (2009)</b>		
Identifies all areas of flood risk within the district as well as what the level of risk is	Flood zone	The Plan needs to ensure that new development avoids areas identified at risk of flooding and that the existing level of flood risk within and outside Framlingham is not exacerbated and, where possible, reduced.
<b>Suffolk County Council Landscape Typology Mapping</b>		
To map and record the value and variety of the Suffolk landscape.	No targets	Plan should ensure that the development strategy is in keeping with the local landscape typologies
<b>Suffolk Coast &amp; Heaths AONB Management Plan, 2013-18</b>		
The 2013–2033 Vision can be summarised as: <ul style="list-style-type: none"> <li>• Special wildlife, landscape, seascape and heritage qualities are conserved and meet the needs of people who live, work in and visit the AONB</li> <li>• Local communities are fully engaged in the care of the area</li> <li>• A high-quality landscape and infrastructure exists to support sustainable access, tourism and business</li> </ul>	A series of objectives under four themes: <ul style="list-style-type: none"> <li>• Coast and estuaries</li> <li>• Land use and wildlife</li> <li>• Enjoying the area</li> <li>• Working together</li> </ul>	Plan should be consistent and take into account impact on the AONB



Key objectives	Key targets/indicators	Key implications for Neighbourhood Plan and Sustainability Appraisal
<b>Suffolk Historic Landscape Characterisation – Suffolk County Council, 2009</b>		
To identify areas or units of land based on their key historic landscape attributes.		The Plan should ensure that areas of historic landscape character are preserved and enhanced.
<b>Framlingham Conservation Area Appraisal – Supplementary Planning Document, Suffolk Coastal District Council, December 2013</b>		
To assess the key features of the Conservation Area and to provide a Conservation Area Management Plan	No targets	The Plan should ensure that policies which relate to planning applications that will come forward within the Conservation Area reflect the key issues in the Conservation Area Management Plan.
<b>Suffolk Coastal Core Strategy Appropriate Assessment - Suffolk Coastal District Council, November 2011, modified in June 2013</b>		
To assess the impact of the Core Strategy policies on habitats	To assess the impact of the Core Strategy policies on habitats	To assess the impact of the Core Strategy policies on habitats

## District policy context

- 2.9 Framlingham is within Suffolk Coastal district for planning purposes. Suffolk Coastal District Council's (SCDC) District Local Plan and Suffolk County Council's (SCC) Waste Core Strategy make up the Development Plan.
- 2.10 The weight given to policies from the plans above will depend upon the degree to which they conform to the National Planning Policy Framework (NPPF) which in the event of any conflict will take precedence.
- 2.11 The SCDC District Local Plan was adopted in 2013 and was accompanied by a Sustainability Appraisal (incorporating SEA) and a Habitats Regulation Assessment (Appropriate Assessment). Table 1.3 of this Scoping Report considers the relationship between the objectives of the Neighbourhood Plan and those of the District Local Plan and demonstrates that there is general conformity.
- 2.12 It should be noted that, at the present time, there are no other parishes in close proximity to Framlingham that are in the process of preparing neighbourhood plans. As such, there are no plans which could potentially have a residual effect on Framlingham parish.

### 3 BASELINE DATA AND KEY SUSTAINABILITY ISSUES (STAGES A2 & A3)

- 3.1 The SEA Regulations require that certain environmental topics are included within the environmental baseline collected to inform the SEA. The topics required by the SEA Regulations are shown in Table 3.1.
- 3.2 The SEA Scoping Report summarises the current state of the environment and also identifies key trends and pressures for the future. The information is categorised under topics, although it must be recognised that many of the topics are interlinked.

**Table 3.1: Topics and their relevance to the Framlingham Neighbourhood Plan**

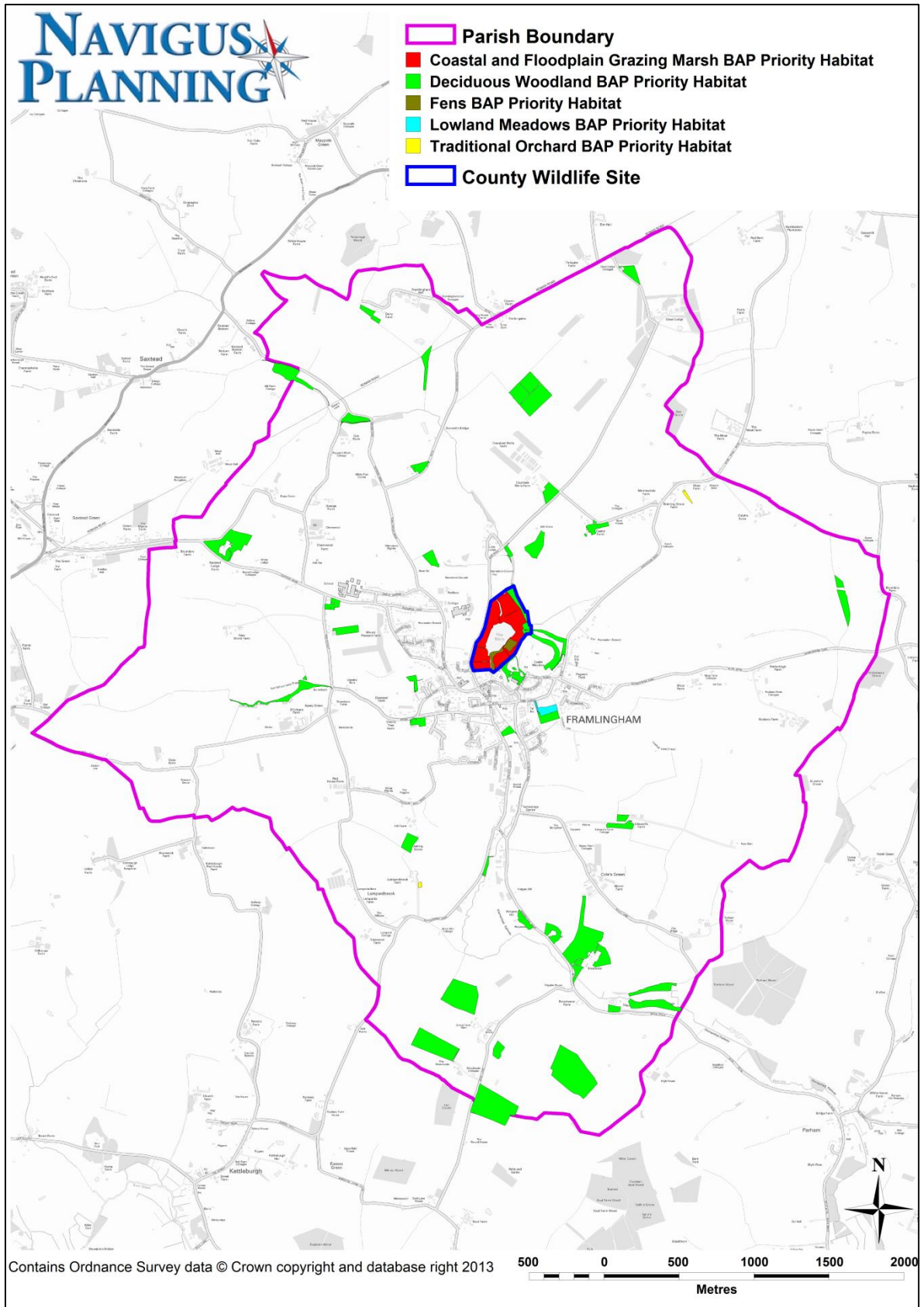
Topic	Relevance to the Framlingham NP
Nature conservation	Potential for new site allocations to impact on the habitats of species within areas of nature conservation value
Landscape	Potential for new site allocations to impact on the landscape
Water	Risk of flooding impacts on where people live and can impact on the economic prosperity of an area.  The way in which water is drained off of land, including road and other hard surfaces, can be important to the level of flood risk experienced in an area.
Soils	Potential for site allocations and development to impact on best agricultural soils or important geological sites.
Heritage	Historic environment features can be vulnerable to damage and other impacts from neglect, decay or development pressures.
Air and Climate	Potential for new site allocations to create pollution through additional congestion.
Human characteristics	Potential for the plan to impact on human health, particularly positively through improvements to walking, cycling routes, etc
Roads and transport	Development could impact on congestion on the road network and create pedestrian safety problems, particularly at key junctions in Framlingham town centre
Infrastructure	Development could have an impact on the infrastructure necessary to keep society running smoothly
Economic characteristics	Development could impact on the ability of communities to function effectively (in their interaction with services) and on the economic prosperity of an area.

- 3.3 The information was compiled from a wide range of information sources. Firstly information came from the draft Neighbourhood Plan and associated work conducted to support it. As part of the widespread consultation work to support the plan this has included feedback from a range of consultees. There are also a number of key reports relevant to the environment of the area and some of their key findings have been summarised here – they are referenced through the text, as are various data sources used to provide maps and statistics. This section presents topics relevant to the Neighbourhood Plan and while it seeks to be comprehensive only the key issues are included to keep the document manageable.

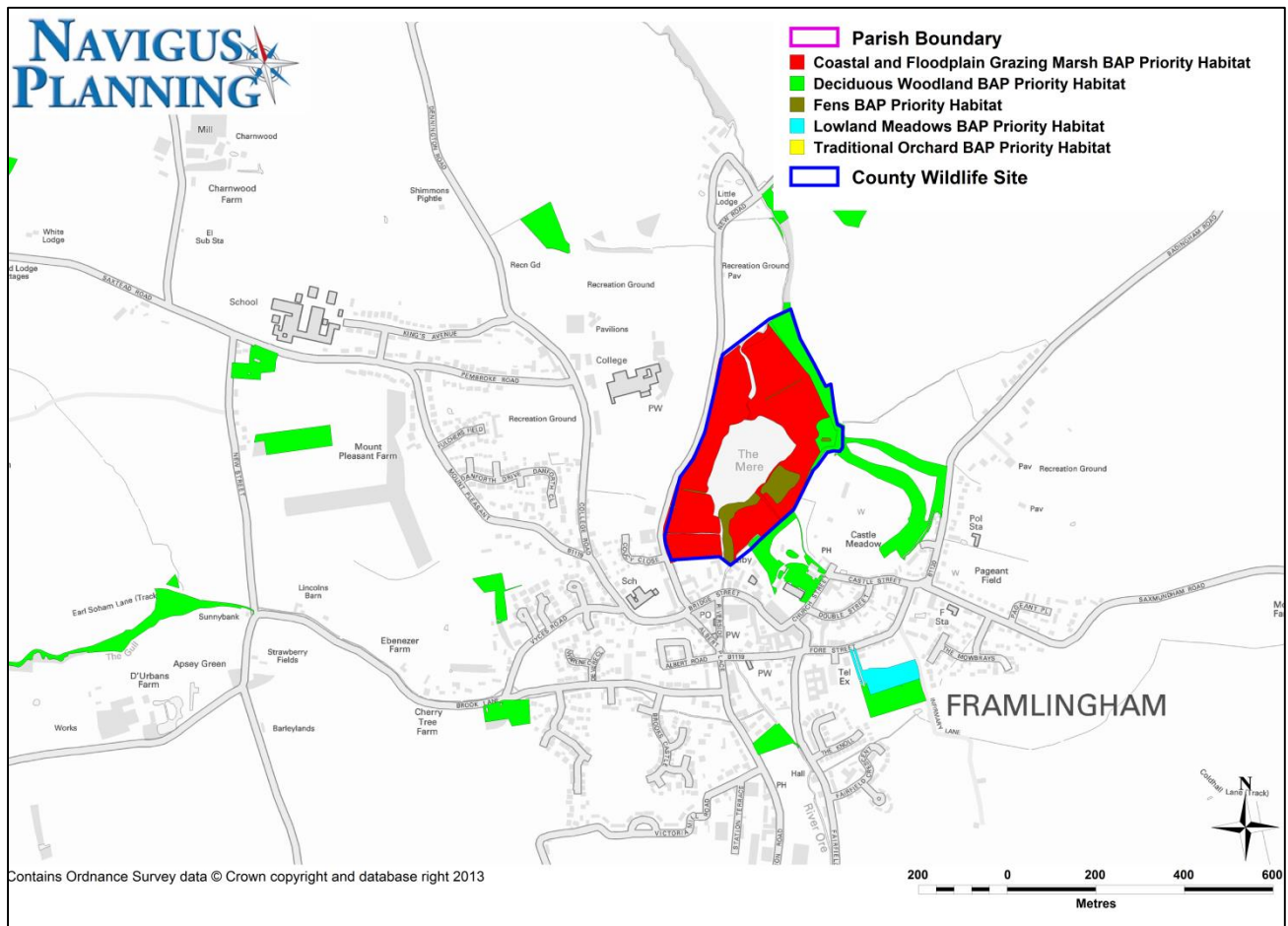
### **Nature conservation and biodiversity**

- 3.4 The most important designation is Framlingham Mere, which is a County Wildlife Site totalling 13.8 hectares. This is adjacent to Framlingham town and the Castle.
- 3.5 In addition there are a number of Biodiversity Action Plan (BAP) Priority Areas across the parish. The most dominant of these is deciduous woodland although no individual BAP Priority Area is particularly extensive.
- 3.6 This is shown in Figure 3.1 and in more detail for the areas around Framlingham town in Figure 3.2.

Figure 3.1: Key environmental features - parish



**Figure 3.2: Key environmental features – Framlingham town**



## Species

3.7 The BAP priority species that are present in Framlingham parish are the following birds:

- Turtle Dove. These can be found in most of the parish and their decline has been due to changes in agricultural practices such as the increased use of herbicides and fertilisers, which have reduced the quantity and variety of wildflowers on arable land. Also, turtle doves nest in large hedges and mature scrub, so the loss of such features as overgrown hedgerows and hawthorn thickets on farmland is likely to have had an adverse effect on the population.
- Northern Lapwing. These can be found in most of the parish.
- Corn Bunting. These can be found on the very western edge of the parish. Their decline has been due to the loss of extensive mixed farming.
- Eurasian Tree Sparrow. These can be found on the very western edge of the parish. Their decline has been due to changes in agricultural practices such as the increased use of herbicides and fertilisers.

3.8 Information from the Suffolk Biological Records Centre shows sitings of the following species since 2006:

<b>Insect</b>	<b>Insect...cont...</b>	<b>Amphibian</b>	<b>Moss</b>	<b>Moss...cont...</b>
Small Skipper	Willow Beauty	Smooth Newt	Common Cord-moss	Anomalous Bristle-moss
Essex Skipper	Clouded Silver	Great Crested Newt	Thickpoint Grimmia	White-tipped Bristle-moss
Large Skipper	Privet Hawk-moth	Common Toad	Grey-cushioned Grimmia	Silver-moss
Clouded Yellow	Pine Hawk-moth	Common Frog	Lesser Pocket-moss	Bryum bicolor
Brimstone	Lime Hawk-moth		Fatfoot Pocket-moss	Capillary Thread-moss
Large White	Eyed Hawk-moth	<b>Bony fish</b>	Slender Pocket-moss	Bryum dichotomum
Small White	Poplar Hawk-moth	European Eel	Short-leaved Pocket-moss	Raspberry Bryum
Green-veined White	Bedstraw Hawk-moth		Common Pocket-moss	Crimson-tuber Thread-moss
Orange-tip	Elephant Hawk-moth	<b>Fern</b>	Green Pocket-moss	Pea Bryum
Purple Hairstreak	Sallow Kitten	Hart's-tongue	Redshank	Swan's-neck Thyme-moss
Small Copper	Iron Prominent		Common Pincushion	Hart's-tongue Thyme-moss
Brown Argus	Swallow Prominent	<b>Flowering plant</b>	Silky Forklet-moss	Greater Water-moss
Common Blue	Coxcomb Prominent	Field Pepperwort	Field Forklet-moss	Fern-leaved Hook-moss
Holly Blue	Pale Prominent	Bee Orchid	Variable Forklet-moss	Creeping Feather-moss
White Admiral	Buff-tip	Pedunculate Oak	Heath Star Moss	Kneiff's Feather-moss
Red Admiral	Garden Dart	Giant Bellflower	Weissia controversa var. controversa	Common Feather-moss
Painted Lady	Heart & Dart	Hemlock Water-dropwort	Hornschuch's Beard-moss	Dwarf Feather-moss
Small Tortoiseshell	Shuttle-shaped Dart		Lesser Bird's-claw Beard-moss	Clustered Feather-moss
Peacock	Flame Shoulder	<b>Bird</b>	Bird's-claw Beard-moss	Long-beaked Water Feather-moss
Comma	Large Yellow Underwing	Mallard	Fallacious Beard-moss	Curve-stalked Feather-moss
Silver-washed Fritillary	Lesser Yellow Underwing	Little Egret	Cylindric Beard-moss	Tender Feather-moss
Speckled Wood	Broad-bordered Yellow Underwing	Cormorant	Dusky Beard-moss	Swartz's Feather-moss
Grayling	Lesser Broad-bordered Yellow Underwing	Red Kite	Rigid Beard-moss	Whitish Feather-moss
Hedge Brown	Least Yellow Underwing	Sparrowhawk	Wavy Beard-moss	Sand Feather-moss
Meadow Brown	Ingrailed Clay	Buzzard	Olive Beard-moss	River Feather-moss
Small Heath	Setaceous Hebrew Character	Kestrel	Soft-tufted Beard-moss	Rough-stalked Feather-moss
Ringlet	Double-square Spot	Hobby	Wall Screw-moss	Neat Feather-moss
Southern Hawker	Square-spot Rustic	Water Rail	Tortula muralis var. muralis	Yellow Feather-moss
Emperor Dragonfly	Dot Moth	Golden Plover	Tortula schimperi	Silky Wall Feather-moss

Banded Demoiselle	Pale-shouldered Brocade	Lapwing	Common Pottia	Pointed Spear-moss
Azure Damselfly	Bright-Line Brown-Eye	Woodcock	Cuspidate Earth-moss	Hypnum cupressiforme
Common Blue Damselfly	Varied Coronet	Whimbrel	Phascum cuspidatum var. cuspidatum	Supine Plait-moss
Small Red-eyed Damselfly	Feathered Gothic	Black-headed Gull	Smallest Pottia	Springy Turf-moss
Blue-tailed Damselfly	Brown-line Bright-eye	Common Tern	Intermediate Screw-moss	Woodsy Silk-moss
Emerald Damselfly	Clay	Woodpigeon	Small Hairy Screw-moss	Flat Neckera
Common Darter	White-point	Turtle Dove	Water Screw-moss	Blunt Feather-moss
Tree Bumblebee	Common Wainscot	Barn Owl	Marble Screw-moss	Fox-tail Feather-moss
Ghost Moth	Blair's Shoulder-knot	Swift	Great Hairy Screw-moss	Larger Mouse-tail Moss
Orange Swift	Merveille Du Jour	Reed Warbler	Zygodon viridissimus var. viridissimus	Rambling Tail-moss
Leopard Moth	Dark Brocade	Grasshopper Warbler	Wood Bristle-moss	
Bird-cherry Ermine	Feathered Ranunculus	Swallow		
Plum Tortrix	Brown-spot Pinion	House Martin		
Codling Moth	Beaded Chestnut	Meadow Pipit		
Garden Grass-veneer	Centre-barred Sallow	Grey Wagtail		
Hook-streak Grass-veneer	Lunar Underwing	Pied Wagtail		
Small Grey	Sallow	Duncock		
Common Purple & Gold	Poplar Grey	Robin		
Small Magpie	Grey Dagger	Blackbird		
Mother of Pearl	Knot Grass	Fieldfare		
Gold Triangle	Copper Underwing	Spotted Flycatcher		
Dark Pine Knot-horn	Mouse Moth	Blue Tit		
Common Plume	Angle Shades	Great Tit		
Oak Eggar	Suspected	Nuthatch		
Oak Hook-tip	Dun-bar	Jackdaw		
Buff Arches	Dark Arches	Carrion Crow		
Common Emerald	Dusky Brocade	Siskin		
Small Emerald	Mesapamea	Chaffinch		
Blood-Vein	Dusky Sallow	Goldfinch		
Small Blood-vein	Flounced Rustic	Bullfinch		
Small Dusty Wave	Rosy Rustic			
Single-dotted Wave	Treble Lines	<b>Liverwort</b>		
Riband Wave	Uncertain	Crescent-cup Liverwort		
Silver-ground Carpet	Rustic	Marchantia polymorpha subsp. ruderalis		
Garden Carpet	Mottled Rustic	Glauous Crystalwort		

Common Carpet	Burnished Brass	Forked Veilwort		
Dark Spinach	Silver Y	Bifid Crestwort		
Barred Straw	Beautiful Golden Y			
Barred Yellow	Scarce Silver Y	<b>Reptile</b>		
Spruce Carpet	Spectacle	Grass snake		
Green Carpet	Brown-tail			
Mottled Pug	Yellow-tail	<b>Terrestrial mammal</b>		
White-spotted Pug	Red Underwing	European Otter		
Double-striped Pug	Herald	American Mink		
Treble-bar	Snout	West European Hedgehog		
Yellow-barred Brindle	Buttoned Snout	Natterer's Bat		
Magpie	Pinion-streaked Snout	Pipistrelle		
Scorched Wing	Dotted Fan-foot	Soprano Pipistrelle		
Brimstone Moth	Dingy Footman	Long-eared Bat species		
Bordered Beauty	Common Footman	Fallow Deer		
Dusky Thorn	Garden Tiger	European Water Vole		
Early Thorn	White Ermine	Brown Hare		
Scalloped Hazel	Buff Ermine	European Rabbit		
Scalloped Oak	Ruby Tiger			
Swallow-tailed Moth	Green Silver-lines			
Peppered Moth	Oak Nycteoline			

Source: Suffolk Biological Records Centre

- 3.9 In total there are nearly 1,500 records over the period since 2006. The majority of these were in and around Framlingham town itself.
- 3.10 An important issue relating to housing development in Framlingham is the potential adverse effects that the increased population could have on European designated sites including Sandlings Special Protection Area (SPA), Minsmere-Walberswick SPA/Ramsar site and Minsmere to Walberswick Heaths & Marshes Special Area of Conservation (SAC). The Suffolk Coastal Core Strategy Appropriate Assessment<sup>1</sup> was unable to rule out adverse effects on these European sites through increased recreational disturbance as a result of in-combination housing development in the market towns east of Ipswich, including Framlingham. The Appropriate Assessment identified mitigation measures to address these adverse effects including on-site open space provision (particularly to cater for regular users including dog-walkers) and visitor management and monitoring of recreational pressure on the relevant European sites.

<sup>1</sup> The Landscape Partnership (2011, modified in 2013) *Appropriate Assessment for Suffolk Coastal Core Strategy and Development Management Policies*, for Suffolk Coastal District Council



## **Landscape**

- 3.11 Framlingham is a predominantly rural parish. The East of England Landscape Framework<sup>2</sup> lists the following landscape types within the parish:
- Predominantly 'Settled Plateau Claylands' - expansive, elevated, gently rolling plateau landscape, with an ancient enclosure and settlement pattern.
  - Some areas of 'Rolling Valley Claylands/Valley Settled Farmlands' - settled, often busy landscapes which occur along the sides of the sinuous valley corridors that cut through the East Anglian clay plateau.

## **Air and Climate**

- 3.12 There are no air quality management areas (AQMAs) in or close to the parish of Framlingham.

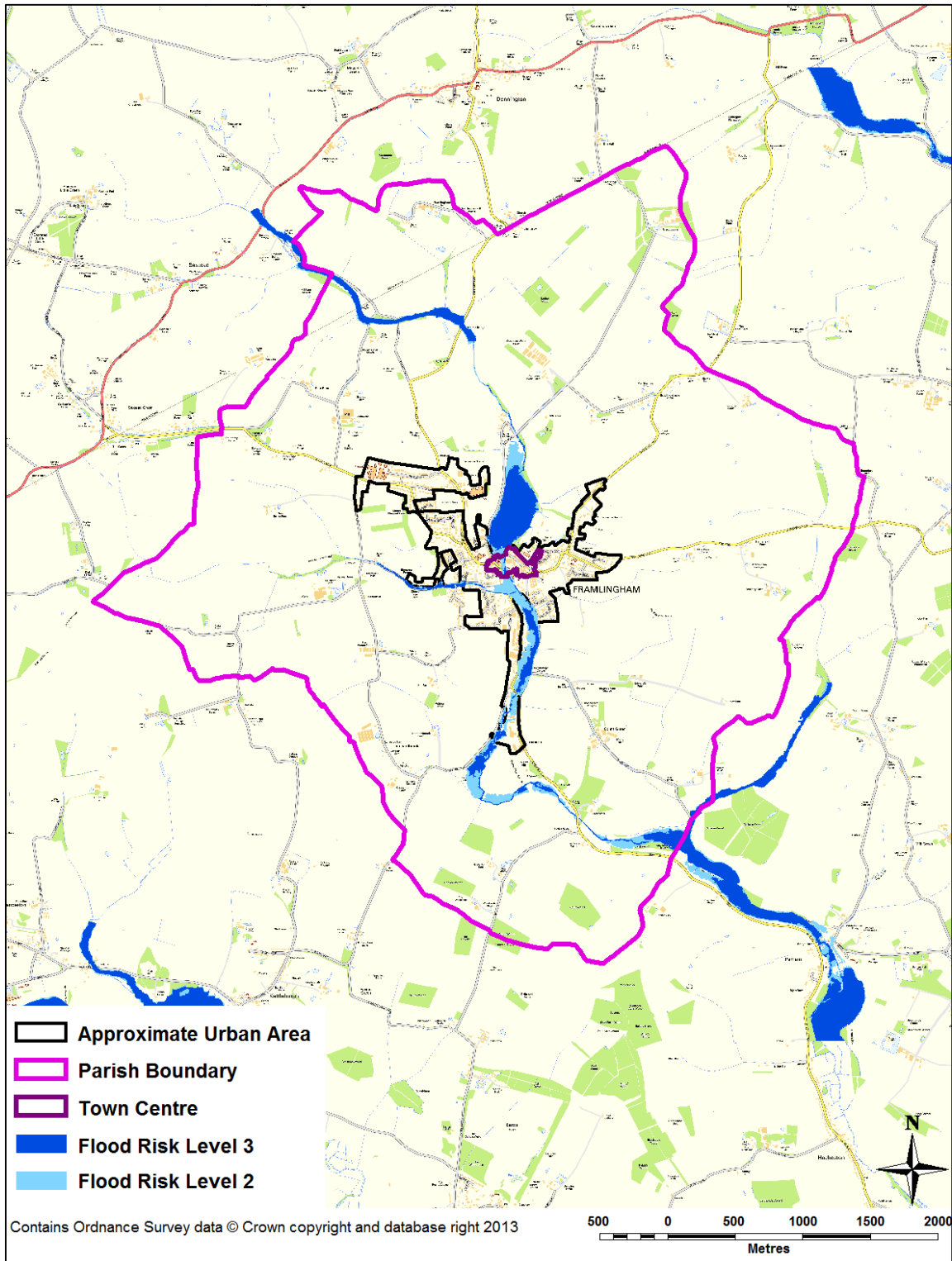
## **Water**

- 3.13 A large part of the parish is within the flood catchment of the River Ore. There have been few reported incidences of flooding and the Environment Agency has confirmed that the large majority of the parish is in Flood Zone 1, which is defined as having a low probability of flooding from rivers or the sea. However, there are some areas, particularly close to and through the town that are Flood Zone 2 or 3.
- 3.14 This is shown in Figure 3.3 below.

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<sup>2</sup> <http://landscape-east.org.uk/map.html>

**Figure 3.3: High flood risk areas**



## Soil and Geology

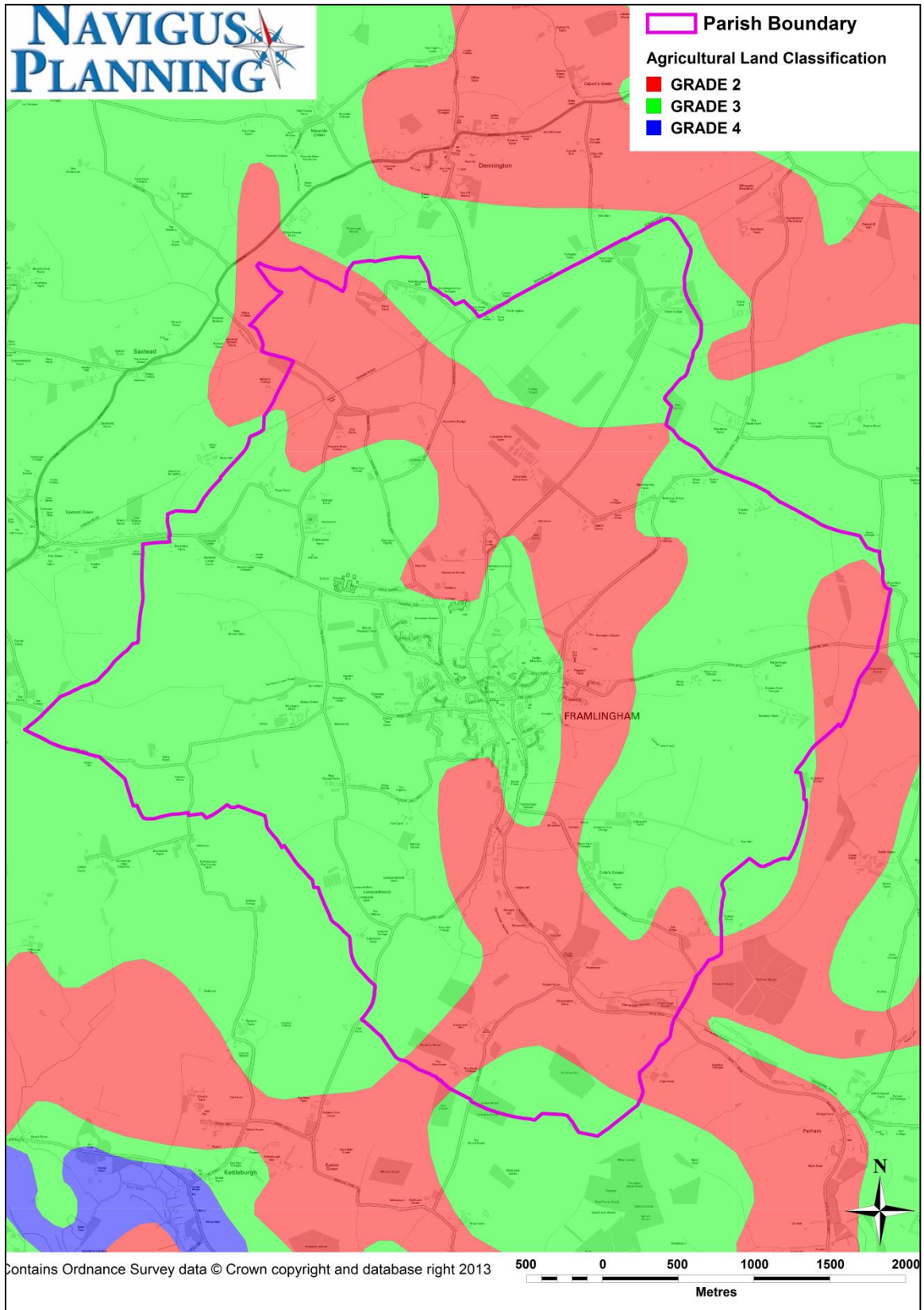
- 3.15 The National Soils Map (NSRI 2001<sup>3</sup>) suggests that the single soil type that is present in the parish is lime-rich loamy and clayey soils with impeded drainage.
- 3.16 The Agricultural Land Classification (ALC) provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. Published by Natural England<sup>4</sup>, the ALC provides a classification in 5 grades using a number of criteria including climate (temperature, rainfall, aspect, exposure, frost risk), site (gradient, micro-relief, flood risk) and soil (depth, structure, texture, chemicals, stoniness). The scales ranges from 1 (high quality) to 5 – poorest.
- 3.17 The NPPF (paragraph 112) states that relevant planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of higher quality. The ALC for Framlingham is shown in Figure 3.4 below.
- 3.18 This shows that the majority of agricultural land in the parish is Grade 3 (good to moderate), with some areas Grade 2 (very good).

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<sup>3</sup> National Soil Resources Institute (2001). National Soil Map. Cranfield University.

<sup>4</sup> <http://publications.naturalengland.org.uk/file/4424325>

**Figure 3.4: Map of agricultural land classification**

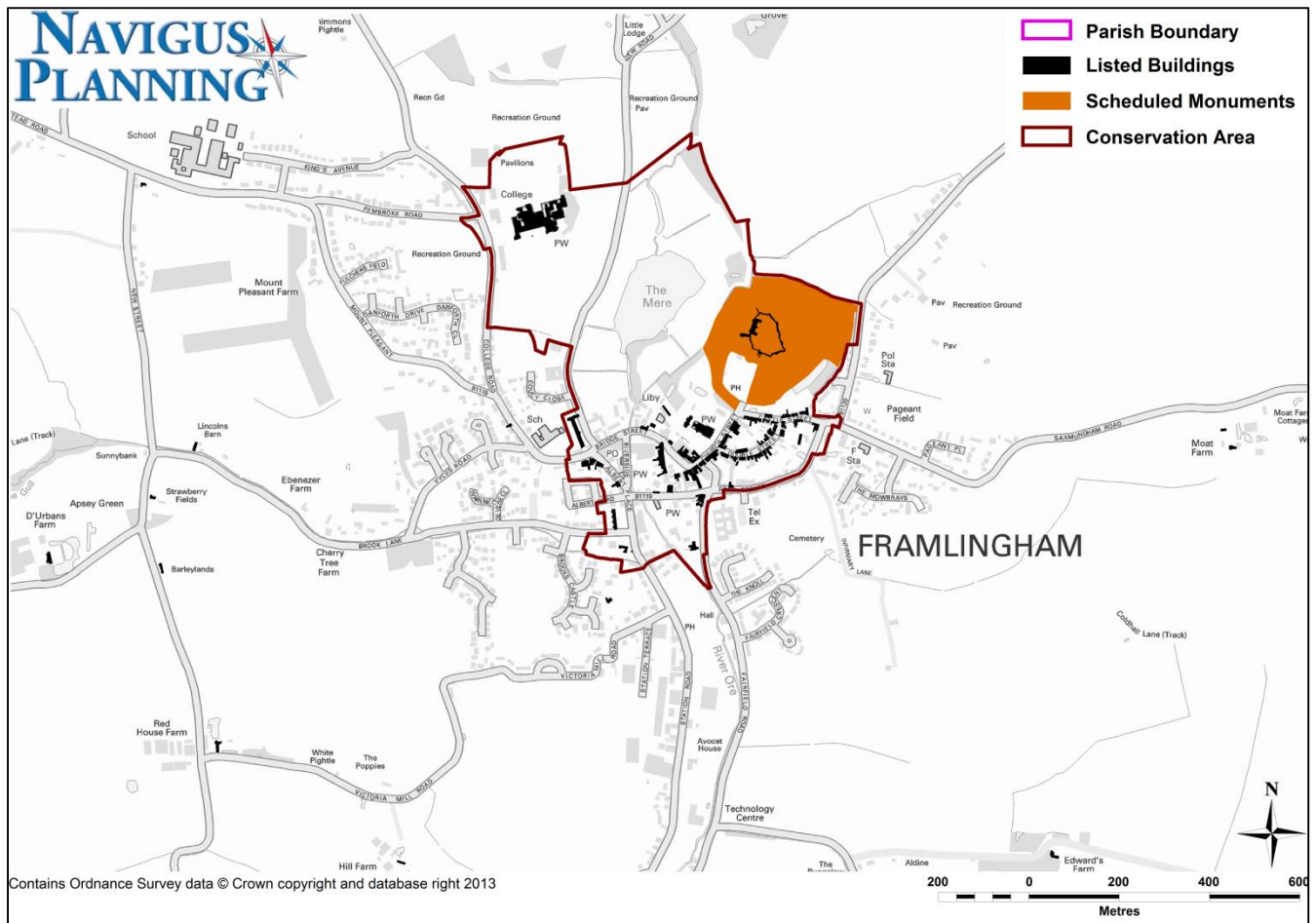


Source: Natural England

## Heritage

- 3.19 There is a single Scheduled Ancient Monument (SAM) in the parish – Framlingham Castle. This is also a Grade I listed building.
- 3.20 The parish includes 137 listed buildings, of which 3 are grade I, 124 are grade II and 10 are grade II\*. Of this total, 96 are in or near the Framlingham town settlement area, with the remainder being outside the settlement. This is shown in Figure 3.5.

**Figure 3.5: Listed buildings and Conservation Area in Framlingham town**



- 3.21 A large part of the built-up area of Framlingham town and an area to the north of the built-up area is subject to conservation area status, this having been first granted in 1970. It was extended to include Framlingham College and the associated landscape through revisions in 1979 and 1988. The most recent Conservation Area Character Appraisal was adopted in December 2013.
- 3.22 The Conservation Area provides a number of excellent examples of local architectural heritage across several centuries which have been well preserved. It contains all of the Grade I listed buildings. One of these is Framlingham Castle, built in the early 12<sup>th</sup> century with a second being the Castle's poor house. The Castle is considered to be a significant heritage asset nationally and is also a Scheduled Ancient Monument, the only one on the parish.
- 3.23 A significant cluster of the listed buildings are located in or close to the area comprising Double Street, Castle Street, Church Street and Market Hill. This is close to the Castle and represents the most sensitive heritage location within the town.

- 3.24 In addition to the listed buildings, there are a number of unlisted buildings and structures dotted throughout the town that make a positive contribution towards the built heritage of Framlingham. These are identified in the Conservation Area Character Appraisal. This includes a particularly significant concentration of such buildings along Bridge Street, including Framlingham Library and Wisteria House.
- 3.25 The heritage of Framlingham is considered to be a significant issue.

### **Social and economic indicators**

- 3.26 The 2011 Census recorded that the population of Framlingham parish was 3,342 persons, living in 1,514 households. Since 2001, the population has grown by 227 persons, or 7.3%. Comparatively, the Suffolk Coastal district population grew by 8.0%. Over the same period, the number of households grew by 241 (18.9%) in Framlingham and by 9,360 in Suffolk Coastal district (19.1%). This number will reflect the number of new houses built over the decade and also possibly the sub-division of existing properties into multiple households.
- 3.27 There has been a broad trend in the increase in population and number of households across the wider district but the rate of increase appears to be marginally lower in Framlingham.
- 3.28 The statistics also provide information on the number of empty homes and for Framlingham these are above the district and national average. For second homes, the proportion in Framlingham is well above the national average but well below the equivalent figure for Suffolk Coastal district. This is shown in Table 3.2.

**Table 3.2: Percentage homes that are empty, 2008**

	<b>Framlingham parish</b>	<b>Suffolk Coastal district</b>	<b>England</b>
Percentage of dwellings empty for more than 12 months (not including second homes)	1.5	1.2	1.4
Percentage of all dwellings that are second homes	2.6	4.3	0.9

Source: ONS

- 3.29 Another barrier for access to housing is house prices – both in relative and absolute terms. In February 2014, the average price of a terraced house in the IP13 postcode area (covering Framlingham) was £312,500<sup>5</sup>. Based on a 95% mortgage, a couple would need a combined income of £119,000, or a single person an income of £99,000, to be able to buy such a property.
- 3.30 Table 3.3 shows the general health of the population. This shows that Framlingham has health levels broadly similar to Suffolk Coastal district and to the national average.

<sup>5</sup> Source: [www.home.co.uk](http://www.home.co.uk)

**Table 3.3: General health, 2011**

	Framlingham parish	Suffolk Coastal district	England
Very good health	46%	47%	46%
Good health	36%	34%	35%
Fair health	14%	13%	14%
Bad health	3%	4%	4%
Very bad health	1%	1%	1%

Source: 2011 Census

- 3.31 The area (Suffolk Coastal super output areas 002B and 002C) ranks amongst the least health deprived of English regions at 29,233 and 23,216 out of 32,482.

### Roads and transport

- 3.32 There are multiple road routes which provide access to Framlingham from all surrounding areas. All of these roads are two-lane routes (i.e. one lane in each direction) and are therefore inappropriate for carrying significant volumes of traffic. This is a particular issue when HGV traffic seeks to come through Framlingham when looking to move east-west.
- 3.33 The roads in the centre of the town reflect its history and are often very small and therefore inappropriate for carrying anything other than a very low level of local traffic.
- 3.34 Framlingham is not served by a train station. There are multiple bus services but these are limited in the service that they provide, particularly to the major service centres including Ipswich.

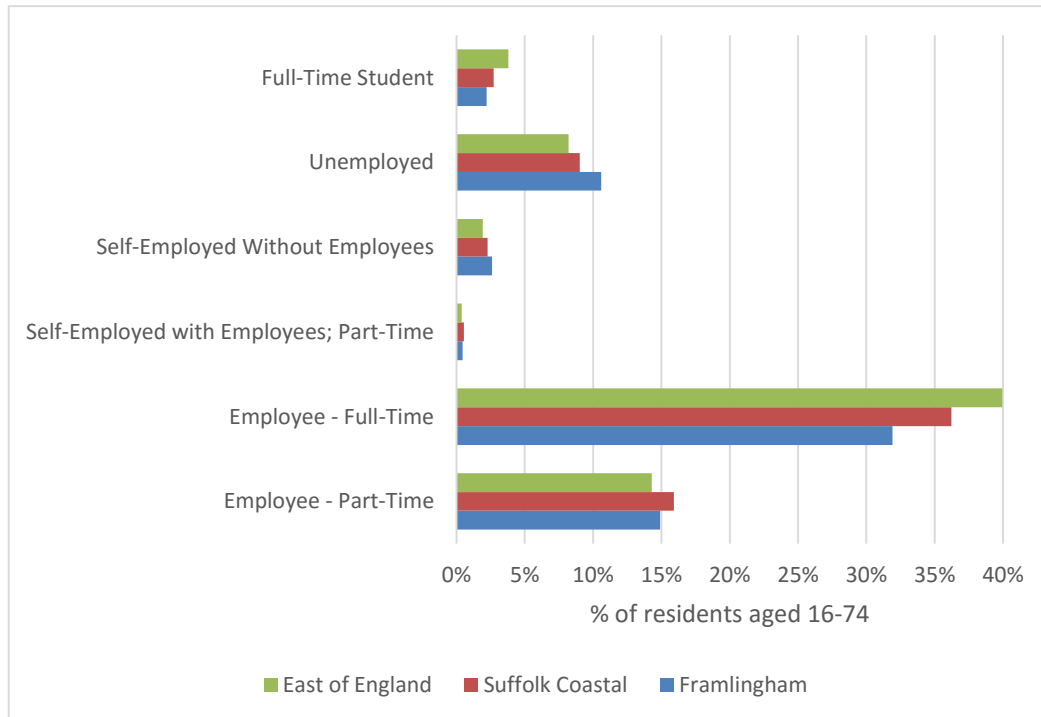
### Infrastructure

- 3.35 Framlingham has the following community infrastructure assets focused in Framlingham town:
- A primary school
  - A secondary school
  - An independent school for children aged 13-18
  - A GP surgery
  - Various places of worship
  - Various recreational spaces used for formal and informal recreation, including play areas
  - A number of pubs and restaurants
  - A range of shops
  - A market

### Economic characteristics

- 3.36 Framlingham's levels of economic activity are below the district and regional figures. This reflects the high proportion of retirees. It does have slightly higher levels of self-employed people without employees, suggesting a significant number of people working for themselves.
- 3.37 This is shown in Figure 3.7.

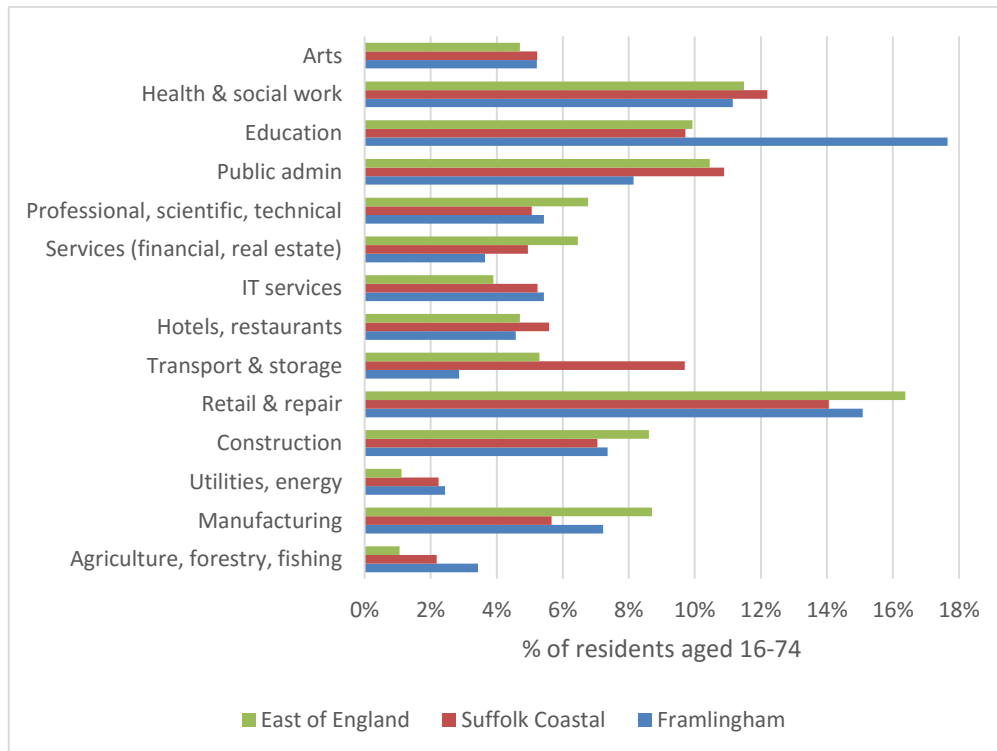
**Figure 3.7: Economic activity, 2011**



Source: 2011 Census

3.38 Framlingham is comparatively strongly represented in the education sector, due to the presence of multiple, large schools. The other sectors that are well represented are retail and IT services. This is shown in Figure 3.8.

**Figure 3.8: Type of industry, 2011**

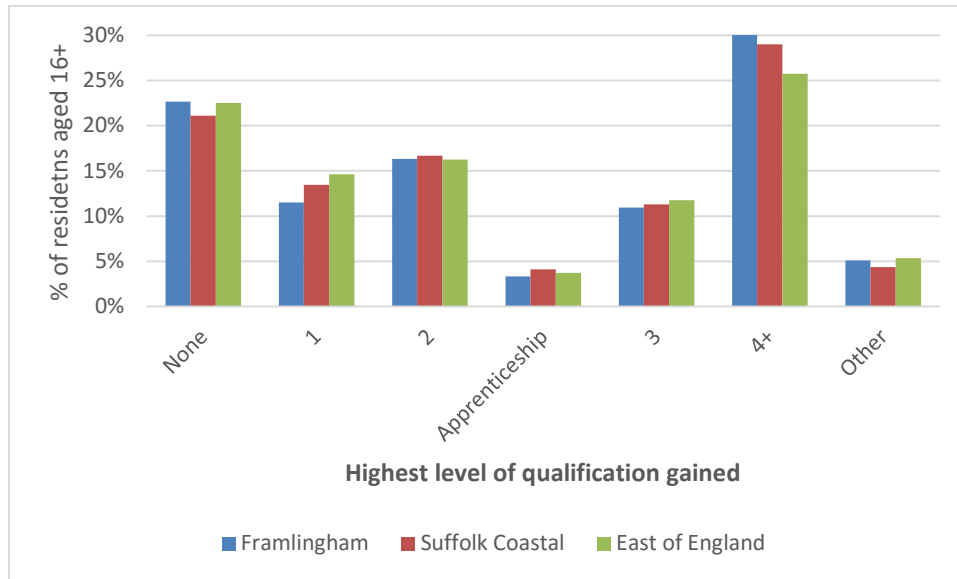


Source: 2011 Census



3.39 Figure 3.9 shows that nearly 25% of the population have no qualifications. By contrast, the proportion that have been educated to Level 4 or above, i.e. degree level, is very high, at 30%.

**Figure 3.9: Qualifications of residents aged 16 and over**



Source: 2011 Census

## 4 KEY SUSTAINABILITY ISSUES

### SWOT analysis

4.1 Table 4.1 has been informed by the issues identified in the Neighbourhood Plan engagement events and consultation, and the baseline information collected in Section 3.

**Table 4.1: SWOT analysis of issues facing Framlingham parish**

<p style="text-align: center;"><b>Strengths</b></p> <ul style="list-style-type: none"> <li>• High quality historic character of town centre (Castle, church, Framlingham College, Market Hill and conservation area)</li> <li>• Only Market Town in District West of A12</li> <li>• Opportunities for growth and employment,</li> <li>• Largely self-sufficient and independent 6 miles from A12 and 7 miles from nearest railway station</li> <li>• Strong network of green spaces to the north and east</li> <li>• Tourist destination</li> <li>• Strong levels of volunteer community support</li> <li>• High quality education</li> </ul>	<p style="text-align: center;"><b>Weaknesses</b></p> <ul style="list-style-type: none"> <li>• Six miles from A12 and seven miles from nearest railway station</li> <li>• Very limited bus service</li> <li>• Retail skewed towards tourists - limited range of 'raw' food shops and essential goods</li> <li>• Employment opportunities limited</li> <li>• Lack range of financial services. Only one bank remaining</li> <li>• Lack of central 'town owned' community centre</li> <li>• Infrastructure struggling to cope with present populations needs</li> </ul>
<p style="text-align: center;"><b>Opportunities</b></p> <ul style="list-style-type: none"> <li>• To extend the service role provided for adjacent villages</li> <li>• To increase the scale and range of employment</li> <li>• To enhance and extend the tourist market including the accommodation on offer</li> <li>• To provide a central town owned community hall</li> <li>• To re-establish Framlingham as a transport hub, with appropriate network links</li> <li>• To assess the infrastructure from a whole town perspective and ensure it is fit for purpose</li> </ul>	<p style="text-align: center;"><b>Threats</b></p> <ul style="list-style-type: none"> <li>• Seen as a thriving centre 'with few constraints to development' the town has been identified as capable of accommodating significant levels of growth</li> <li>• Population profile is skewed towards retired and elderly</li> <li>• Levels of service provision and infrastructure under severe pressure to cope with growing population demands</li> <li>• Sensitive settings, iconic views and edges/ entrances to the town are threatened</li> <li>• Dominance of road transport causing problems of parking, volume and speed causing safety issues for pedestrians, cyclists and users of mobility scooters</li> </ul>

## Key issues

- 4.2 There are a number of sustainability issues and challenges facing the parish. While Framlingham parish offers a high quality environment to residents and local businesses, the Neighbourhood Plan will need to manage and seek to resolve a series of issues over its lifetime if the parish is to continue to be successful while respecting its outstanding landscape setting.
- 4.3 In the absence of a Neighbourhood Plan (and as a consequence a lack of vision and strategy for Framlingham), there will be fewer opportunities to address the issues and challenges facing the parish, as well as contributing to a reduction in the potential benefit to the community.

**Table 4.2: Challenges and impacts of not having a neighbourhood plan**

Challenges facing Framlingham Parish	Effect of not having a neighbourhood plan
Problem of traffic speed, volume and weight and lack of pedestrian/cyclist safety at the town centre junctions	Residents lives will be further blighted and safety will be worsened by traffic movements
Scale of housing growth	District Plan policies are strategic in nature but do require growth of market towns, therefore Framlingham could be exposed to speculative applications for major housing
Lack of affordable housing for parish residents	No suitable sites for housing for local people would be delivered
Supporting an ageing population	Potential issues of care/support/transport and a lack of local homes suitable for the needs of older people
Inadequate and potentially reducing public transport options	Increased dependence on the private car and increasing isolation for those unable to afford a car
Support and flexibility for local businesses	The needs of businesses to grow and change may be restricted by current policies
Retention of vibrant town centre	Issues of parking and lack of accessibility to town centre discourage people to shop there
Improvement of tourism offer	Tourism provision is ad hoc and does not make the most of the potential linked to the town centre
Infrastructure improvements such as roads, crossings, parking, community facilities	Funding for infrastructure requirements may not arise and provision of community facilities may not keep up with growing demand
Pressures for development in countryside	District Plan policies are strategic in nature but do require growth of market towns which could therefore be ad-hoc and unplanned
Loss of agricultural land to development	Could result in unnecessary loss of agricultural land due to unplanned development coming forward through speculative applications
Poor access to services and facilities	Increased dependence on the private car to access services and inability to do so for those unable to afford a car.
Need to maintain and enhance the high quality natural environment, wildlife networks and biodiversity of the parish	Could result in unnecessary impacts on biodiversity due to unplanned development coming forward through speculative applications
Need to protect and enhance the historic buildings and environment of the parish	Could result in unnecessary impacts on heritage assets due to unplanned development coming forward through speculative applications

## 5 SUSTAINABILITY APPRAISAL FRAMEWORK (STAGE A4)

5.1 In order to undertake the Sustainability Appraisal process for the Neighbourhood Plan, it is necessary to identify sustainability objectives and indicators to enable an assessment to be made of the emerging options and allow for recommendations and mitigation measures to be proposed. The sustainability objectives have emerged through the following considerations:

- through the review of documents listed in Section 2
- as identified in the baseline section (Section 3)
- to help address sustainability issues known locally
- to help address the 'weaknesses' and mitigate the 'threats' outlined in the SWOT analysis (Section 4)

5.2 The proposed sustainability objectives and indicators (Sustainability Framework) for the Sustainability Appraisal of the Neighbourhood Plan are as shown in Table 5.1 below:

**Table 5.1: Sustainability objectives and criteria for the Framlingham Neighbourhood Plan**

Sustainability theme	Objectives	Criteria
1/Env	To preserve and enhance the natural beauty of Framlingham in terms of its geology, landform, soils, biodiversity, water systems and climate	<ul style="list-style-type: none"> <li>- Change in area of SSSIs/SPAs/SACs/Ramsar sites within the parish.</li> <li>- Change in area of County Wildlife Sites within the parish</li> <li>- Change in area of ancient woodland in parish</li> <li>- Change in area of priority habitats within the parish (data from Suffolk Biological Records Office)</li> <li>- Change in area /grade of agricultural land classification (ALC) land lost.</li> <li>- Number of developments in 'highly vulnerable' or 'more vulnerable' flood risk areas.</li> </ul>
2/Env	To protect the landscape setting of Framlingham town through use of land with a low landscape impact and by focusing development on previously developed land	<ul style="list-style-type: none"> <li>- Loss of/impact on views of value.</li> <li>- Number of planning applications granted in areas with low landscape capacity.</li> <li>- Development on previously developed land.</li> </ul>
3/Soc	To ensure that housing addresses the needs of the existing community of Framlingham before addressing wider needs	<ul style="list-style-type: none"> <li>- Mix of housing built by dwelling size.</li> <li>- Number of people with a local connection on the Housing Register that are newly housed.</li> <li>- Number of affordable homes completed.</li> </ul>
4/Econ	To maximise the potential of existing employment/employers and support the need for new employment opportunities.	<ul style="list-style-type: none"> <li>- Number of existing businesses retained.</li> <li>- Number of new businesses in the parish.</li> </ul>

Sustainability theme	Objectives	Criteria
		<ul style="list-style-type: none"> <li>- Number of local start-ups.</li> <li>- Number of new jobs likely to be created.</li> <li>- Number of businesses and dwellings (for home workers) with access to superfast broadband.</li> </ul>
5/Econ	To extend the range and scope of the retail experience within the town centre.	<ul style="list-style-type: none"> <li>- Number of shop units in the primary retail area</li> <li>- Number of vacant shop units in the primary retail area</li> </ul>
6/Env	To protect the identity and local distinctiveness of Framlingham by conserving and enhancing the historic environment, heritage assets and their settings	<ul style="list-style-type: none"> <li>- Number of listed buildings in built-up area.</li> <li>- Number of applications for listed building consent.</li> <li>- Number of developments within or adjacent to a Conservation Area.</li> <li>- Number of trees with TPOs.</li> </ul>
7/Soc	To ensure that the community has a high quality and healthy lifestyle.	<ul style="list-style-type: none"> <li>- Census figures on long term illness and general health.</li> <li>- Number/area of green spaces within walking distance of homes.</li> <li>- Usage of formal green spaces within the parish.</li> <li>- Number of formal recreation facilities within walking distance of homes.</li> <li>- Number of homes experiencing unacceptable levels of noise.</li> </ul>
8/Soc	To ensure the provision of a range of community facilities that provide for the needs of the community	<ul style="list-style-type: none"> <li>- Number of community facilities within the parish.</li> </ul>
9/Econ	To protect, manage, enhance and expand the tourist experience in Framlingham and provide a greater range and scope of tourist accommodation and facilities	<ul style="list-style-type: none"> <li>- Number of tourist facilities serving the town.</li> <li>- Number of day visitors.</li> <li>- Number of staying visitors.</li> </ul>
10/Soc	To improve safe and sustainable movement around the parish and to the town centre by a range of modes	<ul style="list-style-type: none"> <li>- Levels of traffic at key junctions in the town centre.</li> <li>- Number and distance of new footpaths/cyclepaths.</li> <li>- Speed data from police.</li> <li>- Accident data from police.</li> <li>- Number of safe crossing points serving the town centre.</li> </ul>
11/Soc	To ensure that the community has adequate access to the key services it needs, including health facilities, convenience shops, and schools	<ul style="list-style-type: none"> <li>- Distance the population of the parish live from key services.</li> <li>- Availability of regular public transport.</li> <li>- Number of shops in the town centre.</li> <li>- Speed of broadband services.</li> </ul>

## **6 ASSESSMENT OF SUSTAINABILITY OF PLAN POLICIES AND SITE OPTIONS**

- 6.1 The sustainability appraisal objectives shown in Table 5.1 will be used to assess the sustainability of the plan policy options and of the site options. In respect of the sites, this appraisal will be undertaken on all of the sites submitted and the information presented to the community as part of the ongoing engagement process in order to understand which sites are the most sustainable and are best able to deliver against the objectives of the Neighbourhood Plan.
- 6.2 In order to ensure a comprehensive approach, possible sites for development were gleaned from the SCDC Strategic Housing Land Availability Assessment (SHLAA) process.
- 6.3 For each sustainability objective, the assessment will give a score in respect of the relevant criterion. The score will be made on the following scale:
- Strongly positive
  - Slightly positive
  - Neutral
  - Slightly negative
  - Strongly negative
- 6.4 A commentary will also be provided for each criterion on each site in order to provide more context to the 'five-point' assessment.
- 6.5 The same assessment will be used to address the plan policies against alternatives.
- 6.6 Table 6.1 below relates the sustainability objectives back to the key concerns and valued aspects of the parish that were raised by the community. These were identified by the community through the engagement process on the neighbourhood plan and informed the SWOT analysis in Section 4.

**Table 6.1: Comparison of sustainability objectives with valued aspects and concerns raised by the community of Framlingham**

	1/Env – Countryside & Biodiversity	2/Env – Landscape/Views	3/Soc - Housing	4/Econ - Commercial	5/Econ - Retail	6/Env - Heritage	7/Soc - Health	8/Soc - Community	9/Econ - Tourism	10/Soc – Transport & Movement	11/Soc - Services
<b>VALUED ASPECTS</b>											
Countryside and landscape	√	√									
Heritage of town						√					
Range of community facilities							√	√			
Shops and services in town centre				√	√						√
Tourism offer									√		
<b>CONCERNS</b>											
Traffic speed/volume										√	
Public transport										√	√
Cycling/walking							√			√	
Vulnerability of services				√	√						√
Lack of affordable housing			√								
Housing mix not suitable for local needs			√								
Loss of rural character	√	√									
Local employment opportunities				√	√				√		

## **7 NEXT STEPS**

- 7.1 This Scoping Report will be subject to consultation for a 5-week period. Following the close of consultation, all comments will be considered and will help influence the draft SEA/SA Report.
- 7.2 As the Neighbourhood Plan is developed, the strategy, policies and site options will be tested against these sustainability objectives, to identify appropriate policies for inclusion in the Plan. All realistic policy options will be appraised against the Sustainability Framework set out in Section 5 of this report, in order to ensure that the policies chosen for the Framlingham Neighbourhood Plan are the most sustainable, given all realistic alternatives.



