

Strategic Environmental Assessment (SEA) of the Bredfield Neighbourhood Plan

Updated Environmental Report following Examination

Bredfield Neighbourhood Plan Steering Group

January 2020

Quality information

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Revision History

Revision	Revision date	Details	Authorized	Name	Position
1	1 st March 2019	Draft for Neighbourhood Group comment	01/03/2019	Nick Chisholm-Batten	Associate Director
2	8 th March 2019	Final to accompany submission plan	08/03/2019	Nick Chisholm-Batten	Associate Director
3	24 th January 2020	Update following examination	24/01/2020	Nick Chisholm-Batten	Associate Director

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Non-Technical Summary

Introduction

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

SEA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and reasonable alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding or mitigating negative environmental effects and maximising positive effects. Through this approach, the SEA for the Bredfield Neighbourhood Plan seeks to maximise the Neighbourhood Plan's contribution to sustainable development.

An SEA Environmental Report was first published alongside the Submission version of the Bredfield Neighbourhood Plan in March 2019.

This January 2020 version of the Environmental Report is an updated report following examination.

Structure of the Environmental Report and this NTS

SEA reporting essentially involves answering the following questions in turn:

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

Each of these questions is answered in turn below. Before answering the first question however, two initial questions are answered in order to further set the scene. First, what is the Plan seeking to achieve? Second, what is the scope of the SEA?

What is the Plan seeking to achieve?

The vision for the Neighbourhood Plan area is as follows:

"Our vision for Bredfield is of a thriving and vibrant village community, ready to welcome a degree of controlled growth, provided it does not put at risk our valued green spaces, environmental and historic assets, our relatively safe roads, or the freedom from light pollution which the village currently enjoys"

To achieve this vision, the following objectives have been identified:

Natural Environment

- *Distinctive views will be maintained, and no development will intrude significantly into the landscape*
- *Existing trees, hedges, streams and field margins are an integral to the character of the area and should be retained wherever possible.*
- *BAP Priority Habitat areas will be protected and enhanced by giving certain features of the landscape a measure of protection.*

Historic Environment

- *Buildings, monuments, sites, places, areas and landscape identified as being of local importance and value will be protected.*
- *Identified sites of archaeological interest should be protected.*

Community

- *Local services and community facilities will be retained and developed by taking every opportunity to publicise and promote them.*
- *Improved broadband facilities will continue to be sought.*

Business

- *Farms will be supported to maintain the attractive landscape around the village.*
- *Local small businesses will be encouraged and supported.*

Traffic and transport

- *New housing should have adequate parking for occupants and visitors.*
- *Collaboration with the Highways authority to achieve improved and safer access to the A12 from Bredfield is a priority.*
- *Traffic management improvements including better signage, enhanced speed restrictions, traffic calming measures and a review of existing controls on HGV traffic will be undertaken.*
- *Provision of additional safe pedestrian and cycle access through the village will be supported.*

Housing

- *New housing development will prioritise one/two bedroom homes aimed at younger buyers and those wishing to downsize as well as small family homes.*
- *The Settlement Boundary (also known as the Physical Limits Boundary) will be redrawn to accommodate the preferred new sites.*
- *New development in the village will be at a level consistent with the Local Plan allocation for Bredfield.*
- *New housing should be sympathetic to the character and street scene of its setting.*

Scope of the SEA

The scope of the SEA comprises the sustainability issues and objectives that should be a focus of (and provide a broad methodological framework for) the SEA. 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.¹ As such, these authorities were consulted on the SEA scope in March 2018.

The SEA Framework presents the sustainability objectives established through SEA scoping, developed through a consideration of the key issues. Taken together, the sustainability themes and objectives provide a methodological 'framework' for undertaking the assessment.

The SEA Framework is presented in Chapter 3 of the main body of the Scoping Report, and presented under the following seven themes:

- Biodiversity
- Climate change
- Landscape and historic environment
- Land, soil and water resources
- Population and community
- Health and wellbeing
- Transportation

¹ In accordance with Article 6(3) of the SEA Directive, these consultation bodies were selected because 'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.'

Plan making and SEA so far

Plan-making has been underway in Bredfield since 2015 following approval of Bredfield's Neighbourhood Area application by Suffolk Coastal District Council in August 2015. The scope, objectives and policies of the plan have evolved in response to extensive engagement with the local community by the Parish Council and Neighbourhood Plan working groups alongside external technical input. Additionally, the planning policy context of the Neighbourhood Plan has itself evolved whilst Neighbourhood Plan-making has been underway. The most significant developments in terms of direct effects for the Bredfield Neighbourhood Plan have been the publication of the Suffolk Coastal First Draft Local Plan Review in September 2018 and the subsequent publication of the Final Draft [pre-Submission] Local Plan Review in January 2019. These updates necessitated further changes to the Neighbourhood Plan, particularly in relation to the quantum of development it must deliver to meet Bredfield's housing target.

Housing numbers to be delivered through the Neighbourhood Plan

Bredfield's housing target has evolved during preparation of the Neighbourhood Plan. The Site Allocations and Area Specific Policies Development Plan Document (SAASP DPD) (adopted January 2017) set a total housing target of **10** dwellings in Bredfield to be delivered over the adopted Core Strategy period to 2027. The First Draft Local Plan Review (Sept 2018) increased the housing target for Bredfield to **20** dwellings over the revised plan period to 2036. The Final Draft Local Plan Review (Jan 2019) further evolved this position, setting an overall target of **30** dwellings to 2036, minus the total number of commitments since the base date. There are **10 committed dwellings** in Bredfield meaning the Neighbourhood Plan must therefore allocate sites to deliver a **residual need of 20 dwellings** to 2036.

In order to explore potential site options for allocation the Neighbourhood Plan Group have tested a number of sites around Bredfield. All sites tested were identified through Suffolk Coastal District's Local Plan Review Issues and Options Consultation Document, published in August 2017. This consultation document identified **18** site options in Bredfield as 'potential land for development' The site reference numbers used throughout the Neighbourhood Plan echo those used in the Local Plan Review Issues and Options consultation.

Establishing the reasonable alternatives for the location of growth

A detailed technical site assessment was conducted by AECOM in May 2018 which appraised all 18 of the identified site options. The site assessment concluded that just one site, Site 459, was suitable for allocation in the Neighbourhood Plan without the need for mitigation of constraints. However, the site now has planning permission for ten dwellings and will not be an allocation in the Neighbourhood Plan.

A further seven sites were found potentially appropriate for allocation, subject to mitigation of identified constraints. These sites are summarised below:

Table 1: Site options for the Bredfield Neighbourhood Plan

Site reference	Site name	Area (ha)	Indicative housing capacity
Site 251	Land north of Ufford Road	2.9	0*
Site 367	Land south of Chapel Farm, Woodbridge Road	0.6	Up to 12
Site 534	Land south of Tudor Cottage, East of The Street	0.6	Up to 10
Site 694	Land west of Woodbridge Road	0.2	Up to 10
Site 784	Land between A12 & Woodbridge	1.3	Up to 12

Site reference	Site name	Area (ha)	Indicative housing capacity
Site 891	Land in between Sirocco and Ivy	0.2	Up to 3
Site 944**	Land south of Templars, Bredfield	1.2	Up to 23
Employment site	Land west of The Forge	0.48	0***

*Site 251 is nominated as a tourist and holiday accommodation and is not available for residential use.

** Site 944 was included in the AECOM site assessment but was subsequently withdrawn by the landowner and is no longer available.

*** Land west of the Forge is nominated for employment use only and is not available for residential development.

SEA site assessment findings

To support the consideration of these sites for allocation in the Neighbourhood Plan, the SEA process includes an appraisal of the key environmental constraints and opportunities at each of the sites and potential effects that may arise as a result of development. The sites have been considered in relation to the SEA Framework.

It should be noted that subsequent to the AECOM site assessment exercise Site 944 was withdrawn by the landowner and is no longer available. Consequently, it does not feature in the below appraisals. The appraisals of the performance of each remaining potential site option are presented below:

Table 2: Summary of the SEA site assessment findings.

Site	Biodiversity	Climate change	Landscape/historic env.	Land, soil and water resources	Population and community	Health and wellbeing	Transport
Site 251							
Site 367							
Site 534							
Site 694							
Site 784							
Site 891							
Employment Site							

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

Reasonable spatial strategy alternatives

In light of the SEA site assessment findings, the spatial strategy options considered as reasonable alternatives for delivering Bredfield's housing need of at least 20 dwellings to 2036 are as follows:

- Option 1:** Site 534, Site 694 and the employment site at Land west of The Forge, delivering up to 20 dwellings and new employment land (preferred option).
- Option 2:** Site 534 and Site 784, delivering up to 22 dwellings (retain existing employment land).
- Option 3:** Site 367 and Site 784, delivering up to 24 dwellings (retain existing employment land and provide alternative to Site 534).

Two sites were discounted on the basis of being either unsuitable or unavailable for residential development. **Site 251** was not nominated for residential use and is therefore considered unavailable for residential allocation, whilst **Site 944** was withdrawn from consideration by the landowner and is therefore no longer available for allocation. **Site 891** has capacity for only 3 dwellings. It is therefore not considered suitable to form part of the reasonable alternatives as it makes too small a contribution to housing delivery in isolation and is not necessary to allocate in combination with other larger sites.

The reasonable alternatives therefore explore the potential allocation of combinations of two sites from **Site 367**, **Site 534**, **Site 694** and **Site 784** meet the residual housing need, plus the allocation of Land west of The Forge for employment use to enable Site 694 to come forward for housing. These are the only reasonable options for delivering Bredfield's housing need of at least 20 dwellings to 2036. Each of the sites is of sufficient size to deliver at least 10 dwellings, meaning the allocation of no more than two sites is necessary in total.

The spatial strategy alternatives were then appraised against the SEA framework. The findings of this appraisal are summarised below:

Table 3: Summary of the reasonable spatial strategy alternatives appraisal findings

SEA theme	Rank of preference		
	Opt 1	Opt 2	Opt 3
Biodiversity	2	2	1
Climate change	3	1	2
Landscape and historic environment	1	2	3
Land, soil and water resources	=	=	=
Population and community	1	2	2
Health and wellbeing	1	1	3
Transportation	=	=	=

The preferred approach

In light of the findings of the spatial strategy options appraisal, the sites proposed for allocation in the Neighbourhood Plan are **Site 534** (Land South of Tudor Cottage), **Site 694** (The Forge) and the proposed employment site at Land west of The Forge. All site options were identified from the pool of 'Issues and Options' sites which the 2018 AECOM site assessment found to be potentially suitable for development, subject to mitigation of identified issues. Individually, the preferred sites also performed most strongly in the SEA site assessment and perform most strongly overall in combination with each other when tested against the reasonable alternatives.

On this basis, a spatial strategy option similar to **Option 1** is selected as the preferred approach by the Parish Council as it is considered to align best with the Plan's objectives and perform most strongly in terms of

integrating with the existing built area of the village and focussing growth at areas which generated community support in the Individual Questionnaire circulated by the Parish Council in 2017.²

Conclusions at this stage

The whole plan appraisal finds that the plan is likely to lead to positive effects in relation to five SEA themes: 'Biodiversity'; 'Landscape and Historic Environment'; 'Population and Community'; 'Health and Wellbeing' and 'Transportation'. Neutral effects are anticipated in relation to the 'Climate Change' SEA theme. Negative effects are anticipated in relation to the 'Land, Soil and Water Resources' SEA theme.

The range of positive effects are anticipated in light of the potential to seek biodiversity net gain at the two preferred site allocations; the fact that development will include opportunities to rejuvenate the low quality built environment at The Forge site; that delivery of housing will be in appropriate locations and have potential to meet local needs; that new development will be required to contribute new or enhanced walking or cycling connectivity with the village's green spaces; and that new development will be expected to avoid contributing to on-street parking and link well with available public transport.

Neutral effects are anticipated in relation to the 'climate change' SEA theme because whilst the plan recognises the role that retaining and enhancing green infrastructure can play in increasing resilience to climate change, particularly increased flood risk, it also allocates Site 694 and Land west of The Forge at which there are areas of medium surface water flood risk. Although surface water flood risk can potentially be mitigated through appropriate design and layout, it is not possible to conclude positive effects in light of the SEA climate change objectives.

Negative effects are anticipated in relation to the 'land, soil and water resources' SEA theme, primarily in light of the fact that the allocation of Site 534 and Land west of The Forge will necessitate the loss of productive agricultural land with potential to be 'best and most versatile'. It is acknowledged that some balance is achieved by allocating the brownfield Site 694 as well, though the brownfield site will only come forward once Land west of The Forge is developed to provide an alternative employment site. In this context it is not possible to conclude positive or neutral effects on the SEA land, soil and water resources objectives.

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

Next steps

The Bredfield Neighbourhood Plan and this Environmental Report were submitted to Suffolk Coastal District Council for Independent Examination. At Independent Examination, the Neighbourhood Plan was considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and was in general conformity with the existing Local Plan. **This updated version of the report has been prepared following examination and incorporates updates and amendments requested by the examiner.** If the Independent Examination is favourable, the Neighbourhood Plan will be subject to a referendum, organised by Suffolk Coastal District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Neighbourhood Plan will become part of the Development Plan for Bredfield Parish.

² Bredfield Parish Council (2017), 'Bredfield NHP Survey Summary' [online], available from:
<http://bredfield.onesuffolk.net/assets/Uploads/PDF-folder/Survey-summary-combined-results-PDF-27-Jan-17.pdf>

1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the Bredfield Neighbourhood Plan.
- 1.2 The Bredfield Neighbourhood Plan has been prepared as a Neighbourhood Development Plan under the Localism Act 2012. The Neighbourhood Plan has been prepared in the context of the adopted Suffolk Coastal Core Strategy (2013) and SAASP DPD (2017) and the emerging Suffolk Coast District Local Plan Review.
- 1.3 The Neighbourhood Plan was submitted to Suffolk Coastal District Council in March 2019. An SEA Environmental Report was first published alongside the Submission version of the Bredfield Neighbourhood Plan.
- 1.4 **This January 2020 version of the Environmental Report is an updated report following examination which responds-to and incorporates clarifications and amendments requested by the examiner.**
- 1.5 Key information relating to the Bredfield Neighbourhood Plan is presented in Table 1.1 below:

Table 1.1 Bredfield Neighbourhood Plan – Key Facts

Name of Responsible Authority	Bredfield Parish Council
Title of Plan	Bredfield Neighbourhood Plan
Subject	Neighbourhood planning
Purpose	<p>The Bredfield Neighbourhood Plan has been prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan must be in general conformity with Suffolk Coastal District Council's adopted Local Plan and the emerging Suffolk Coastal District Local Plan Review.</p> <p>The Bredfield Neighbourhood Plan will be used to guide and shape development within the Bredfield Neighbourhood Plan area.</p>
Timescale	2018 – 2036
Area covered by the plan	The Neighbourhood Plan area covers the parish of Bredfield in Suffolk (see Figure 1.1)
Summary of content	The Bredfield Neighbourhood Plan sets out a vision, strategy and range of policies for the Neighbourhood Plan area.
Plan contact point	<p>David Hepper, Bredfield Neighbourhood Plan Group</p> <p>Email address: davidhpper99@gmail.com</p>

LEGEND

- Bredfield Neighbourhood Plan Area

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Purpose of Issue:

Client
BREDFIELD PARISH COUNCIL

Project Title
STRATEGIC ENVIRONMENTAL ASSESSMENT OF THE BREDFIELD NEIGHBOURHOOD PLAN

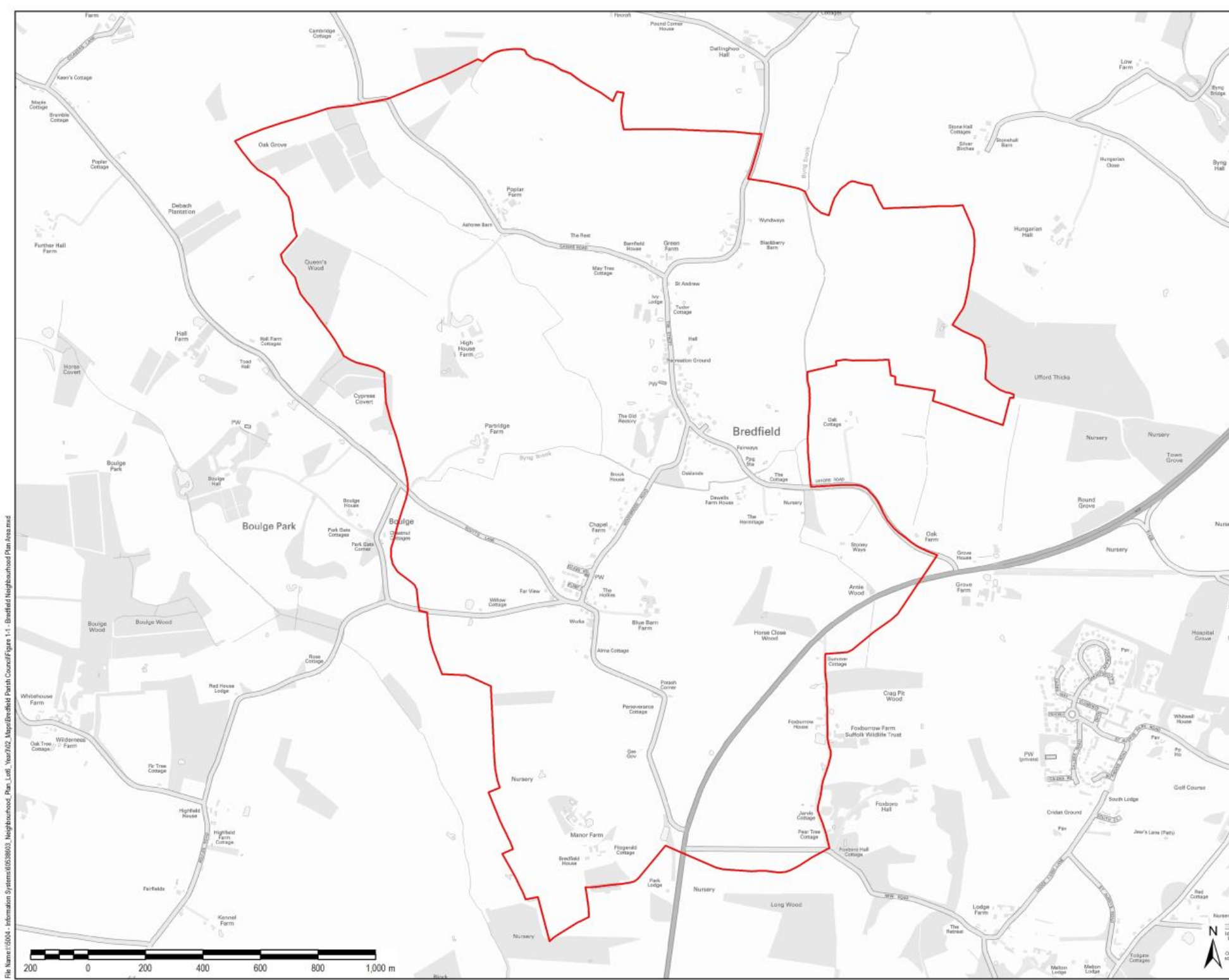
Drawing Title
BREDFIELD NEIGHBOURHOOD PLAN AREA

Drawn CN	Checked JW	Approved SP	Date 16/02/2018
AECOM Internal Project No 60538603		Scale @ A3 1:12,000	

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Drawing Number
FIGURE 1.1



File Name: I:\5004 - Information Systems\60538603_Neighbourhood_Plan_L08_V02\Map\Bredfield Parish Council\Figures 1.1 - Bredfield Neighbourhood Plan Areas.mxd

SEA explained

- 1.6 The Bredfield Neighbourhood Plan has been screened in by Suffolk Coastal District Council (SCDC) as requiring an SEA due to the potential for significant environmental effects from site allocations within the Neighbourhood Plan area.
- 1.7 SEA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and reasonable alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding or mitigating negative environmental effects and maximising positive effects. Through this approach, the SEA for the Bredfield Neighbourhood Plan seeks to maximise the emerging Neighbourhood Plan's contribution to sustainable development.
- 1.8 The SEA has been prepared in conformity with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive³.
- 1.9 The SEA Regulations require that a report is published for consultation alongside the submission plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.

Structure of this Environmental Report

- 1.11 In line with the Regulations, a report (known as the Environmental Report) must be published for consultation alongside the submission plan which 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.⁴ The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.12 More specifically, the Environmental Report must answer the following three questions:
 1. What has plan-making / SEA involved up to this point? – including in relation to 'reasonable alternatives'.
 2. What are the SEA findings at this stage? – i.e. in relation to the submission plan.
 3. What happens next?
- 1.13 This report essentially answers questions 1, 2 and 3 in turn, in order to provide the required information. Each question is answered within a discrete 'part' of the report. However, before answering question 1, two initial questions are answered in order to further set the scene, these are; what is the Bredfield Neighbourhood Plan seeking to achieve; and what is the scope of the SEA?

³ Directive 2001/42/EC

⁴ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004

2. Local planning policy context

Relationship with the Suffolk Coastal Local Plan Review

- 2.1 The Bredfield Neighbourhood Plan is being prepared in the context of the adopted Suffolk Coastal Local Plan and the emerging Suffolk Coastal Local Plan Review. The adopted Local Plan is made up of the following documents:
- Adopted Core Strategy (2013)
 - Adopted Site Allocations and Area Specific Policies Development Plan Document (SAASP DPD) (2017)
 - Adopted Felixstowe Peninsula Area Action Plan (2017)
- 2.2 The emerging Suffolk Coastal Local Plan Review will provide a framework for development to 2036 and will replace all of the above adopted Local Plan documents once it is adopted.
- 2.3 Local Plans seek to give communities a solid framework within which appropriate community-led planning policy documents, including Neighbourhood Plans, can be brought forward.
- 2.4 The Bredfield Neighbourhood Plan must be in general conformity with the strategic policies of the adopted Local Plan. Therefore, there is a need to conform to the strategic policies in the adopted Core Strategy and adopted SAASP DPD. Whilst the emerging Local Plan Review is not yet adopted, it was submitted to the Secretary of State for Independent Examination in March 2019. The NPPF states that *"local planning authorities may give weight to relevant policies in emerging plans"* according to a set of criteria, including the stage it has reached. The emerging Local Plan Review is therefore a material consideration and has provided much of the strategic context for the Bredfield Neighbourhood Plan.
- 2.5 The emerging Local Plan Review is at an advanced stage of preparation. The Submission version of the plan published, under Regulation 19 of the Local Planning Regulations, in January 2019. Regulation 19 (Pre-Submission) consultation commenced on 14th January 2019 and ran until February 25th 2019. This followed Regulation 18 (Issues and Options) consultation which took place between 20th July and 14th September 2018. Following the conclusion of the Regulation 19 consultation the Plan was submitted to the Secretary of State for examination in spring 2019 ahead of anticipated adoption by Suffolk Coastal District Council in early 2020.
- 2.6 The emerging Local Plan reorganises the District's settlement hierarchy and identifies Bredfield as a 'Small Village' at tier 4 of 5, one tier above 'Countryside' at the bottom of the hierarchy. The supporting text of Policy SCLP5.2 (Housing Development in Small Villages) says that small villages are identified on the basis of their *"modest range of service provision, which will serve the needs of residents within the village"*. The policy text itself says that *"Residential development will be permitted within defined Settlement Boundaries"* at the identified Small Villages. The Neighbourhood Plan will revise Bredfield's existing defined Settlement Boundary (also known as the Physical Limits Boundary, or PLB) to embrace the proposed site allocations.
- 2.7 For context, the adopted SAASP DPD (2017) includes an allocation of 10 new dwellings in Bredfield by the end of the plan period in 2027. This is a trend-based target based on permissions granted between 2010 and 2015. The SAASP DPD identifies that the Neighbourhood Plan will *"need to allocate land for new housing development"* to deliver this growth⁵. No sites are allocated in Bredfield through the SAASP DPD itself.
- 2.8 However, as noted in paragraph 2.3 the SAASP DPD will be superseded by the Proposed Submission Plan. Paragraph SCLP12.1 of the Proposed Submission Plan says that Suffolk Coastal District Council will *"support the production of Neighbourhood Plans in identifying appropriate, locally specific policies"* and

⁵ <http://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Site-Allocations-and-Area-Specific-Policies/Adopted-Version-Sites-DPD-January-2017.pdf> (page 23) [Last accessed 08/02/18]

that “where Neighbourhood Plans seek to plan for housing growth, they will be expected to plan for the indicative minimum housing requirements set out [in Policy SCLP12.1]”.

- 2.9 In this context, Policy SCLP12.1 establishes that the Neighbourhood Plan should deliver an indicative minimum number of 20 dwellings to be delivered in Bredfield to 2036. Notably, this target is “in addition to existing permissions, allocations and dwellings with resolution to grant”.⁶

Vision, aims and objectives of the Bredfield Neighbourhood Plan

- 2.10 The Neighbourhood Plan sets out the following overall vision statement for Bredfield Parish:

“Our vision for Bredfield is of a thriving and vibrant village community, ready to welcome a degree of controlled growth, provided it does not put at risk our valued green spaces, environmental and historic assets, our relatively safe roads, or the freedom from light pollution which the village currently enjoys”⁷

- 2.11 To deliver this vision the Neighbourhood Plan set out the following aims:

- Introduce policies and other measures to ensure the protection of our village environment and rural tranquillity for future generation to enjoy;
- Encourage and support local activities and facilities that enhance our already vibrant community spirit;
- Seek to define and support a greater degree of protection for villagers and passers-by from speeding traffic and HGV’s, and;
- Clearly delineate the boundaries, size, appearance and overall scale for future housing development.

- 2.12 To achieve these aims the Neighbourhood Plan proposes objectives grouped under the headings ‘Natural Environment’; ‘Historic Environment’; ‘The Community’; ‘Business’; ‘Traffic and Transport’; and ‘Housing’.

- 2.13 The objectives are contained within discursive text which includes a broader discussion on issues facing Bredfield. The objectives are therefore summarised below:

Natural Environment

- Distinctive views will be maintained, and no development will intrude significantly into the landscape
- Existing trees, hedges, streams and field margins are an integral to the character of the area and should be retained wherever possible.
- BAP Priority Habitat areas will be protected and enhanced by giving certain features of the landscape a measure of protection.

Historic Environment

- Buildings, monuments, sites, places, areas and landscape identified as being of local importance and value will be protected.
- Identified sites of archaeological interest should be protected.

Community

- Local services and community facilities will be retained and developed by taking every opportunity to publicise and promote them.
- Improved broadband facilities will continue to be sought.

⁶ Suffolk Coastal District Council (2019), ‘Suffolk Coastal Local Plan: Final Draft Plan’ [online], available from: <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Final-Draft-Local-Plan/Final-Draft-Local-Plan.pdf>

⁷ Bredfield Parish Council (2017), ‘Bredfield Neighbourhood Plan 2017-2036 Pre-Submission Edition’, page 7

Business

- Farms will be supported to maintain the attractive landscape around the village.
- Local small businesses will be encouraged and supported.

Traffic and transport

- New housing should have adequate parking for occupants and visitors.
- Collaboration with the Highways authority to achieve improved and safer access to the A12 from Bredfield is a priority.
- Traffic management improvements including better signage, enhanced speed restrictions, traffic calming measures and a review of existing controls on HGV traffic will be undertaken.
- Provision of additional safe pedestrian and cycle access through the village will be supported.

Housing

- New housing development will prioritise one/two bedroom homes aimed at younger buyers and those wishing to downsize as well as small family homes.
- The Settlement Boundary (also known as the Physical Limits Boundary) will be redrawn to accommodate the preferred new sites.
- New development in the village will be at a level consistent with the Local Plan allocation for Bredfield.
- New housing should be sympathetic to the character and street scene of its setting.

3. Scope of the SEA

SEA scope

- 3.1 The SEA Regulations require that 'when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies'. In England, the consultation bodies are Natural England, the Environment Agency and Historic England.⁸
- 3.2 The SEA Scoping Report underwent consultation with the statutory consultees between March 14th 2018 and April 18th 2018. A summary of representations to the Scoping Report consultation, along with how they have been considered, is presented in **Appendix I**.
- 3.3 Baseline information (including the context review and baseline data) is presented in **Appendix II**.

SEA framework

- 3.4 These issues were then translated into an 'SEA Framework' of SEA themes and objectives. This SEA Framework provides a methodological framework for the appraisal of likely significant effects on the baseline. This framework is presented below.

Table 3.1 SEA framework

SEA theme	SEA objective
Biodiversity	Protect and, where possible, enhance all biodiversity and geological features including seeking biodiversity net gain
Climate change	Reduce the level of contribution to climate change made by activities within the Neighbourhood Plan area
	Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding
Landscape and historic environment	Protect, maintain and enhance the cultural heritage resource within the Neighbourhood Plan area, including the historic environment and archaeological assets
	Protect and enhance the character and quality of landscape and townscapes
Land, soil and water resources	Ensure the efficient and effective use of land
	Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste
	Use and manage water resources in a sustainable manner
Population and community	Cater for existing and future residents' needs as well as the needs of different groups in the community and improve access to local, high-quality community services and facilities
	Reduce deprivation and promote a more inclusive and self-contained community
	Provide everyone with the opportunity to live in good quality, affordable housing and ensure an appropriate mix of dwelling sizes, types and tenures.
Health and wellbeing	Improve the health and wellbeing of residents within the Neighbourhood Plan area
Transportation	Promote sustainable transport use and reduce the need to travel

⁸ In line with Article 6(3) of the SEA Directive, these consultation bodies were selected 'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes'.

4. Plan-making and SEA so far

Introduction

- 4.1 The 'narrative' of plan-making and SEA for the Bredfield Neighbourhood Plan is set out below, including ways in which the Neighbourhood Plan's development strategy has been shaped by the consideration of reasonable alternative approaches.
- 4.2 A key element of the SEA process is the appraisal of 'reasonable alternatives' for the Neighbourhood Plan. The SEA Regulations⁹ are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the "*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*".
- 4.3 The SEA regulations stipulate that the Environmental Report must include:
- An outline of the reasons for selecting the alternatives;
 - 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.

Plan-making so far

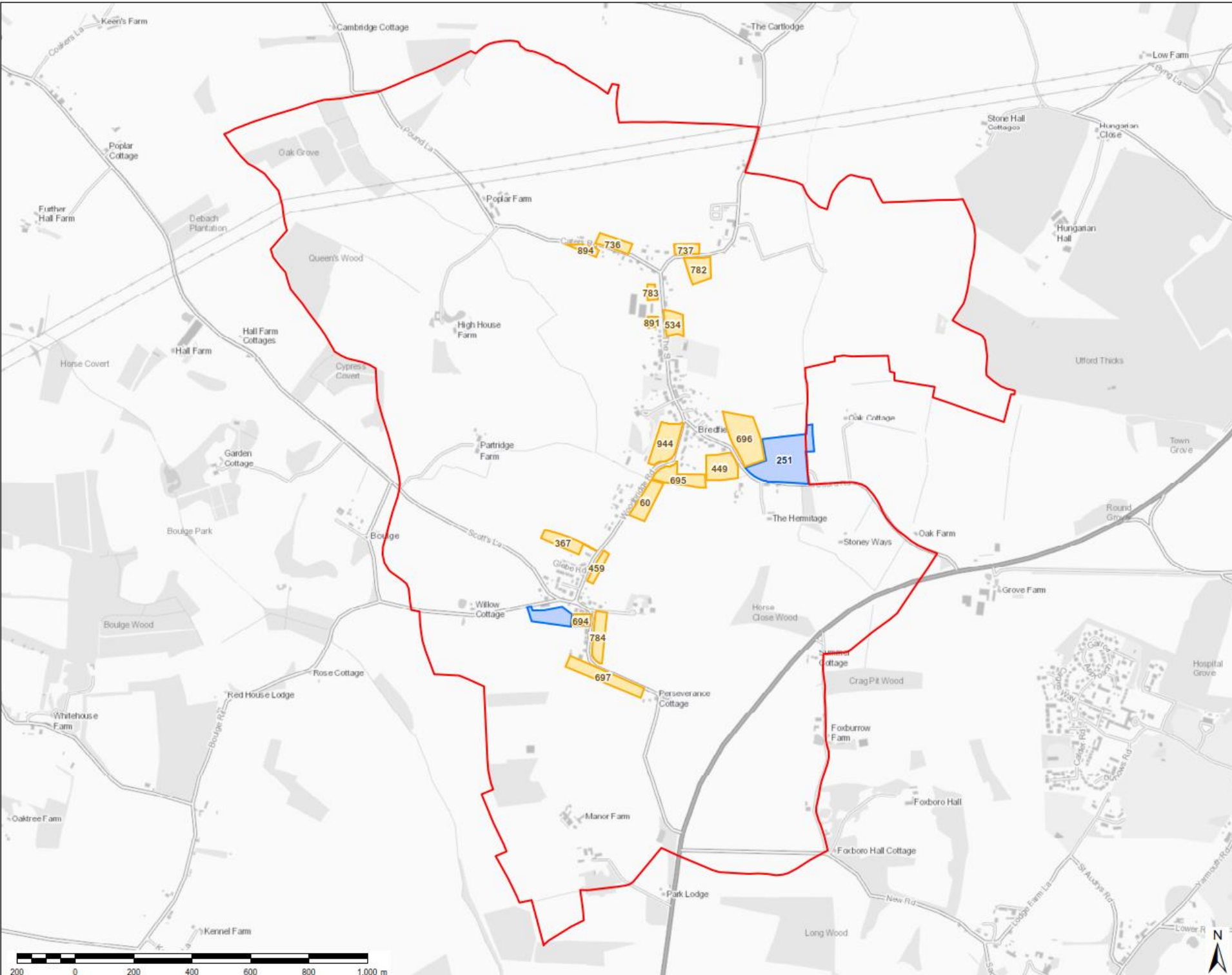
- 4.4 Plan-making has been underway in Bredfield since 2015 following approval of Bredfield's Neighbourhood Area application by Suffolk Coastal District Council in August 2015. The scope, objectives and draft policies of the plan have evolved in response to extensive engagement with the local community by the Parish Council and Neighbourhood Plan working groups alongside external technical input. Additionally, the planning policy context of the Neighbourhood Plan has itself evolved whilst Neighbourhood Plan-making has been underway. The most significant developments in terms of direct effects for the Bredfield Neighbourhood Plan have been the publication of the Suffolk Coastal First Draft Local Plan Review in September 2018 and the subsequent publication of the Final Draft [pre-Submission] Local Plan Review in January 2019. These updates necessitated further changes to the Neighbourhood Plan, particularly in relation to the quantum of development it must deliver to meet Bredfield's housing target.
- 4.5 The narrative of Bredfield's housing target has evolved during preparation of the Neighbourhood Plan. The Site Allocations and Area Specific Policies Development Plan Document (SAASP DPD) (adopted January 2017) set a total housing target of **10** dwellings in Bredfield to be delivered over the adopted Core Strategy period to 2027. The First Draft Local Plan Review (Sept 2018) increased the housing target for Bredfield to **20** dwellings over the revised plan period to 2036. The Final Draft Local Plan Review (Jan 2019) further evolved this position, setting an overall target of **30** dwellings, minus the total number of commitments since the base date. There are 10 committed dwellings in Bredfield (see discussion at paragraphs 4.7 and 4.8 below) meaning the Neighbourhood Plan must therefore allocate sites to deliver a **residual need of 20 dwellings** to 2036.
- 4.6 In order to explore potential site options for allocation the Neighbourhood Plan Group have tested a number of sites around Bredfield. All sites tested were identified through Suffolk Coastal District's Local Plan Review Issues and Options Consultation Document, published in August 2017. This consultation document identified 18 site options in Bredfield as 'potential land for development' – see Figure 4.1 below. The site reference numbers used throughout the Neighbourhood Plan reflect those used in the Local Plan Review Issues and Options consultation.¹⁰

⁹ Environmental Assessment of Plans and Programmes Regulations 2004

¹⁰ Suffolk Coastal District Council (2017), 'Help plan the future of the District – Issues and Options for the Suffolk Coastal Local Plan Review' [online], available from: <http://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Local-Plan-Review/Issues-and-Options-Consultation/Issues-and-Options-for-the-SCDC-Local-Plan-Review-document.pdf>

LEGEND

- Bredfield Neighbourhood Plan Area
- Potential housing site options
- Potential employment site options



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Purpose of Issue
FINAL

Client
BREDFIELD PARISH COUNCIL

Project Title
STRATEGIC ENVIRONMENTAL ASSESSMENT OF THE BREDFIELD NEIGHBOURHOOD PLAN

Drawing Title
POTENTIAL SITE OPTIONS FOR THE BREDFIELD NEIGHBOURHOOD PLAN

Drawn	Checked	Approved	Date
BM	AM	CM	23/12/2019

AECOM Internal Project No. 60571087_DR-10759 Scale @ A3 1:12,000

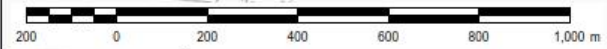
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Drawing Number
FIGURE 4.1

Rev
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File Name: P:\Projects\Environmental\General\GIS\Projects\003\003_Neighbourhood_Plan_L08_Year202_Maps\Bredfield Parish Council\Figure 1.1_Bredfield Neighbourhood Plan Area.mxd



- 4.7 A detailed technical site assessment was conducted by AECOM in May 2018 which appraised 18 of the identified site options. The site assessment concluded that just one site, Site 459, was suitable for allocation in the Neighbourhood Plan without the need for mitigation of constraints. A planning application for a ten dwelling scheme on land identified in the SHLAA as Site 459 was allowed on appeal in 2017. Reserved matters for the scheme were approved in April 2018. The site will consequently not be an allocation in the Neighbourhood Plan and it is therefore not possible to consider reasonable alternatives to this site through the SEA.
- 4.8 However, in light of the revised housing target of 30 dwellings in the Suffolk Coastal Submission Local Plan the permitted scheme at Site 459 has potential to meet a third of Bredfield's housing need and reduces the residual housing target. The Final Draft Local Plan Review confirms this, noting that once the allowed scheme at Site 459 is taken into account Bredfield's residual housing need is reduced to 20 dwellings over the plan period.
- 4.9 A standalone site assessment for Land west of The Forge was undertaken in late 2019 by the Parish Council. This site assessment was in full alignment with the methodology of the earlier AECOM site assessment exercise and the results were captured in the same pro forma structure. Land west of The Forge had not been captured in the original AECOM site assessment because it had not been identified as a site option at the time the exercise was undertaken. The site's later identification means that it has not been assigned a site reference number and is simply referred to as the Employment Site or Land west of The Forge.
- 4.10 In addition to the unconstrained Site 459, a further seven sites were considered potentially appropriate for allocation for housing and one for employment, subject to mitigation of various constraints. These sites are summarised in Table 4.1 below. All other site options were found to be unsuitable for allocation due to the level of constraint affecting each one.

Table 4.1 Potential site options at Bredfield subject to mitigation of constraints ¹¹

Site reference	Site name	Area (ha)	Indicative housing capacity
Site 251	Land north of Ufford Road	2.9	0*
Site 367	Land south of Chapel Farm, Woodbridge Road	0.6	Up to 12
Site 534	Land south of Tudor Cottage, East of The Street	0.6	Up to 10
Site 694	Land west of Woodbridge Road	0.2	Up to 10
Site 784	Land between A12 & Woodbridge	1.3	Up to 12
Site 891	Land in between Sirocco and Ivy	0.2	Up to 3
Site 944**	Land south of Templars, Bredfield	1.2	Up to 23
Employment Site	Land west of The Forge	0.48	0***

¹¹ Based on the AECOM site assessment report, May 2018 available online at: <http://bredfield.onesuffolk.net/assets/Bredfield-Site-Assessment-Final-Report-180514.pdf>

** Site 251 is nominated as a tourist and holiday accommodation and is not available for residential use.*

*** Site 944 was included in the AECOM site assessment but was subsequently withdrawn by the landowner and is no longer available.*

**** Land west of the Forge is nominated for employment use only and is not available for residential development.*

SEA site assessment findings

- 4.11 To support the consideration of these sites for allocation in the Neighbourhood Plan, the SEA process includes an appraisal of the key environmental constraints and opportunities at each of the sites and potential effects that may arise as a result of development. The sites have been considered against to the SEA Framework developed during SEA scoping (outlined in Table 3.1) and the baseline information.
- 4.12 However, it should be noted that subsequent to the AECOM site assessment exercise, Site 944 was withdrawn by the landowner and is no longer available. Consequently, it does not feature in the below appraisals.
- 4.13 The appraisals of the performance of each potential site option against the SEA themes are presented below:

Site 251 (Land north of Ufford Road)

Site size: 2.9ha

Biodiversity	There are no European or nationally designated biodiversity or geodiversity sites within or adjacent or close to the boundary of the site. The site is not within a SSSI impact risk zone for residential, rural residential or non-rural residential development. There are no BAP Priority Habitats on or in the vicinity of the site. Consequently, there is limited potential for negative effects on biodiversity supporting habitats within the site as it is largely open and agricultural in nature.	
Climate change	Site 251 occupies one of the few parts of the Neighbourhood Area affected by fluvial flood risk as it is intersected by Byng Brook. Much of the site is within Flood Zone 3 and there is also extensive surface water flood risk. However, the site is not proposed for residential use and other uses may potentially be appropriate despite the flood risk. Despite this it is considered that in the context of a Neighbourhood Plan area largely unconstrained by flood risk development of any kind on the site would be at greater risk of adverse effects on Site 251 than if it were directed elsewhere.	
Landscape and historic environment	The site is large and open, though the flat landform of the area limits its landscape sensitivity. The site is at the entrance to the village from the east (via Ufford Lane) and may potentially have a greater sensitivity to change from development as a result. The site is near to the Grade II-listed Dewells Farmhouse though in practice the building is screened from Ufford Lane and the site and negative effects on the building's setting are considered unlikely.	
Land, soil and water resources	Site 251 has potential to be within an area of Grade 2 agricultural land, considered to be the 'best and most versatile' land. However, it is noted that the site is not suitable for residential development, and that the nominated tourist use would not necessarily sterilise the land such that it could not be rehabilitated to agricultural use in the future. There are unlikely to be significant effects in terms of waste management and water resource management.	
Population and community	Development at Site 251 for residential uses would not be suitable due to the site's level of flood risk. In this sense, should the site come forward for other forms of development it would not play a role in delivering a mixture of housing types and tenures. However, it could potentially have a role to play in catering for other types of needs within the community, subject to the eventual scheme.	
Health and wellbeing	There could be potential for a non-residential leisure/recreational/holiday scheme to come forward on the site which would likely result in wellbeing benefits for its users. However, these are unlikely to be primarily from the parish if the scheme were to be a tourist use and the effects on the health and wellbeing SEA theme would likely be neutral. The site is well placed to take advantage of the general public right of way network in the surrounding area. All sites are around 10-15 minutes' drive from the nearest health facilities in Woodbridge.	
Transportation	The site is located within walking distance of the key village services of the shop, village hall, sports fields, bowling green, church and bus stops. It is noted that the village pub has permanently closed though if it were to be brought back into use this is also within walking distance. The site is close to bus stops served by busses to Ipswich though as services are infrequent it is likely that all sites will have a high degree of car dependency.	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Site 367 (Land south of Chapel Farm, Woodbridge Road)

Site size: 0.6ha

Biodiversity	Site 367 is not within or adjacent to any biodiversity designations or any Biodiversity Action Plan priority habitats. The site appears open and unlikely to have potential for negative effects on biodiversity supporting habitats, though mature hedgerows appear to encircle the site and these could have some potential to support localised biodiversity.	
Climate change	There are no areas of fluvial flood risk at the site though an area of surface water flood risk crosses the centre of the site. It may be necessary for future development to adopt a layout which has regard for this. The site is walking distance to the limited service offer within the village though would unlikely support sustainable transport access to the wider range of services and facilities at nearby service centres.	
Landscape and historic environment	The site has low sensitivity within the landscape and its location set back from Woodbridge Road behind an existing property could mean that impacts from development on townscape may also be limited. The site is near to the Grade II-listed Chapel Farmhouse though the level of planted screening in the area may limit the effects of development at the site on the building's setting.	
Land, soil and water resources	The site is within an area of either Grade 2 or Grade 3 agricultural land meaning there is potential for development at the site to result in the loss of 'best and most versatile' land. There are unlikely to be significant effects in terms of waste management and water resource management.	
Population and community	Development at the site would contribute to meeting local housing needs, potentially including the delivery of affordable housing. Accessibility to services and facilities is an important influence on the quality of life of residents and community cohesion and the site's village core location will contribute to this though most services will need to be accessed outside the village.	
Health and wellbeing	The site is well placed to take advantage of the public right of way network in the surrounding area though it is unlikely that development at Site 367 would give rise to either positive or negative effects on health and wellbeing.	
Transportation	The site is located within walking distance of the key village services of the shop, village hall, sports fields, bowling green, church and bus stops. It is noted that the village pub has permanently closed though if it were to be brought back into use this is also within walking distance. The site is close to bus stops served by busses to Ipswich though as services are infrequent it is likely that all sites will have a high degree of car dependency.	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Site 534 (Land south of Tudor Cottage, East of the The Street)

Site size: 0.6ha

Biodiversity	The site is immediately south of a Biodiversity Action Plan (BAP) Priority Habitat of 'Traditional Orchard' and 'Deciduous Woodland' at Tudor Cottage. Likely effects on the BAP site are uncertain as these could be influenced by the design, layout and amount of any development at Site 534. However, it is appropriate to flag the potential for both negative and positive effects on biodiversity. There could be opportunities to incorporate biodiversity net gain into the final scheme given the adjacent habitats.	
Climate change	There are no areas of fluvial or surface water flood risk at the site and it is considered that development would be unlikely to adversely affect flood risk. The site is walking distance to the limited service offer within the village though would likely have a high level of car dependence for accessing a wider range of services and facilities at nearby service centres.	
Landscape and historic environment	There are no significant landscape constraints at the site though the site supports limited long range views into and out of the village and giving it a degree of landscape sensitivity. The site is immediately south of Grade II-listed Tudor Cottage though its setting is considered to be limited by established planted screening and it is considered unlikely that development would have a significant detrimental effect.	
Land, soil and water resources	The site is within either Grade 2 or Grade 3 agricultural land, giving it potential to be 'best and most versatile' land. The land is currently in productive arable use. Development would therefore necessitate the loss of BMV agricultural land. The NPPF is clear that planning policies should enhance the natural environment by recognising the range of benefits of BMV agricultural land.	
Population and community	Development at the site would contribute to meeting local housing needs, potentially including the delivery of affordable housing. Accessibility to services and facilities is an important influence on the quality of life of residents and community cohesion and the site's village core location will contribute to this though most services will need to be accessed outside the village.	
Health and wellbeing	The site is located next to the village sports fields and tennis courts which offer additional amenity value to future residents. The site is also well placed to take advantage of the general public right of way network in the surrounding area.	
Transportation	The site is located within walking distance of the key village services of the shop, village hall, sports fields, bowling green, church and bus stops. It is noted that the village pub has permanently closed though if it were to be brought back into use this is also within walking distance. The site is close to bus stops served by busses to Ipswich though as services are infrequent it is likely that all sites will have a high degree of car dependency.	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Site 694 (Land west of Woodbridge Road)

Site size: 0.2ha

Biodiversity	The site is previously developed and currently in use as a garage and mechanic's workshop, with little open space or planting. This gives the existing development low biodiversity value, and could present an opportunity for enhancement through redevelopment. This could potentially include opportunities for biodiversity net gain, although it is acknowledged the site is limited in size.	
Climate change	In terms of climate change mitigation the site is notable as it currently provides a valuable local service in the form of car maintenance and repair. Redevelopment of the site would likely necessitate the relocation of these services, potentially giving rise to the need for some residents to travel further to access them and therefore increasing the need to travel rather than reducing it. In terms of climate change adaptation, the site is within an area of surface water flood risk, with a notable area in the centre of the site at medium risk. It may be possible to mitigate this risk through the design and layout of the final scheme but the surface water flood risk, particularly the area of medium risk, is considered a negative.	
Landscape and historic environment	There are no significant landscape constraints at the site though the site occupies a prominent position at the southern approach to the village and as such could be sensitive to inappropriate development in townscape terms as it will be highly visible. However, the current development on site appears to be of low quality and offers little to the village's street scene. Therefore there could be an opportunity to enhance townscape quality through redevelopment. It is noted that the current garage and workshop use gives the village a degree of vitality which can provide indirect townscape interest through diversity of land use. However, it is considered that this is outweighed by the poor quality of the existing built environment on site.	
Land, soil and water resources	The site is previously developed so new development would not necessitate the loss of any agricultural land. In the context of the plan area this is a notable positive, and would represent an efficient use of resources in terms of directing development away from best and most versatile land.	
Population and community	Development at the site would contribute to meeting local housing needs, though the site's small size could make it challenging to deliver affordable housing in terms of viability. Overall, the contribution to housing need is considered positive despite the potential of no affordable housing.	
Health and wellbeing	The site is well placed to take advantage of the public right of way network in the surrounding area though it is unlikely that development at the site would give rise to either positive or negative effects on health and wellbeing. It is noted that the site fronts on to the busy Woodbridge Road which could potentially harm residential amenity on site through traffic noise and emissions. However, these factors could likely be mitigated sufficiently through design and layout of the final scheme.	
Transportation	The site is located within walking distance of the key village services of the shop, village hall, sports fields, bowling green, church and bus stops. It is noted that the village pub has permanently closed though if it were to be brought back into use this is also within walking distance. However, there is a busy stretch of Woodbridge Road between the site and the village centre and the route between the two is not continuously served by pavements. Additionally, vehicle access to the site would also be from Woodbridge Road and the speed and frequency of traffic as well as the location near a bend in the road could have safety implications. The site is close to bus stops served by busses to Ipswich though as services are infrequent it is likely that all sites will have a high degree of car dependency.	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Site 784 (Land between A12 & Woodbridge Road)

Site size: 0.8ha

Biodiversity	The site is not within or adjacent to any biodiversity designations. There appears to be little potential for negative effects on biodiversity supporting habitats within the site as it is open and agricultural in nature.	
Climate change	There are no areas of fluvial flood risk at the site, though an area of low surface water flood risk is evident at the north of the site. However, it is considered that development would be unlikely to adversely affect flood risk and development could be directed away from the limited area of surface water flood risk. The site is walking distance to the limited service offer within the village though would likely have a high level of car dependence for accessing a wider range of services and facilities at nearby service centres.	
Landscape and historic environment	The site is highly open and is sensitive within the wider landscape, making a contribution to the rural setting and character of the village. The site is potentially within the extended setting of the Grade II-listed Blue Barn Farmhouse which is located north east of the site and faces out over the currently open and undeveloped fields. Inappropriate development could have potential to negatively affect the openness of this setting though it is considered that appropriate design and massing of new development at the site would mitigate this risk. Similarly, the size of the site means that impact on landscape character and quality would likely be dependent on the scale of any future scheme, though there is strong potential for negative effects given the openness of the site, as over development could enclose the approach to the village centre and affect long, characterful views out over the landscape.	
Land, soil and water resources	The site is within an area of either Grade 2 or Grade 3 agricultural land meaning there is potential for the site to be on the 'best and most versatile' land. The land is currently in productive arable use. Development would therefore necessitate the loss of BMV agricultural land. The NPPF is clear that planning policies should enhance the natural environment by recognising the range of benefits of BMV agricultural land.	
Population and community	Development at the site would contribute to meeting local housing needs, and could potentially include the delivery of affordable housing and a mix of house types and tenures.	
Health and wellbeing	The site is well placed to take advantage of the public right of way network in the surrounding area though it is unlikely that development at the site would give rise to either positive or negative effects on health and wellbeing. It is noted that the site fronts on to the busy Woodbridge Road which could potentially harm residential amenity on site through traffic noise and emissions. However, these factors could likely be mitigated sufficiently through design and layout of the final scheme.	
Transportation	Although the site is within walking distance of the key village services at the village centre, it is not connected to the village core by pavement or footpath meaning pedestrians and cyclists could be forced to use a busy stretch of Woodbridge Road unless off road provision was included in development. Additionally, vehicle access to the site would also need to be via a new access point from the same busy stretch of Woodbridge Road and this may have potential to introduce unsafe vehicle movements. The site is close to bus stops served by busses to Ipswich though as services are infrequent it is likely that all sites will have a high degree of car dependency.	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Site 891 (Land in between Sirocco and Ivy Lodge)

Site size: 0.2ha

Biodiversity	The site is immediately west of a Biodiversity Action Plan (BAP) Priority Habitat of 'Traditional Orchard' and 'Deciduous Woodland' at Tudor Cottage. Likely effects on the BAP site are uncertain as these could be influenced by the design, layout and amount of any development at Site 891. However, it is appropriate to flag the potential for both negative and positive effects on biodiversity. There could be opportunities to incorporate biodiversity enhancement net gain into the final scheme.	
Climate change	There are no areas of fluvial or surface water flood risk at the site and it is considered that development would be unlikely to adversely affect flood risk. The site is walking distance to the limited service offer within the village though would likely have a high level of car dependence for accessing a wider range of services and facilities at nearby service centres.	
Landscape and historic environment	The site is south west of Grade II-listed Tudor Cottage though potential impacts on its setting is likely to be limited by established planted screening which screens views to and from this feature. It is considered therefore unlikely that development would have a significant negative effects.	
Land, soil and water resources	The site is technically within an area of either Grade 2 or Grade 3 agricultural land meaning there is potential for the site to be on the 'best and most versatile' land. However, in practice the land does not appear to be in agricultural use and it is considered that there would be a neutral impact in terms of the efficient use of land.	
Population and community	Development at the site would contribute to meeting local housing needs, though the site's very small size would likely make it challenging to deliver affordable housing or a mix of housing types and tenures. Overall, the contribution to housing need is considered positive despite the likely potential for delivering no affordable housing.	
Health and wellbeing	The site is located next to the village sports fields and tennis courts which offer additional amenity value to future residents. The site is also well placed to take advantage of the general public right of way network in the surrounding area.	
Transportation	The site is located within walking distance of the key village services of the shop, village hall, sports fields, bowling green, church and bus stops. It is noted that the village pub has permanently closed though if it were to be brought back into use this is also within walking distance. The site is close to bus stops served by busses to Ipswich though as services are infrequent it is likely that all sites will have a high degree of car dependency.	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Employment Site (Land west of the Forge)

Site size: 0.48ha

Biodiversity	The site is not within or adjacent to any biodiversity designations. There appears to be little potential for negative effects on biodiversity supporting habitats within the site as it is open and agricultural in nature. Development may necessitate some limited hedgerow removal though this does not give rise to concerns about any specific significant adverse effects.	Yellow
Climate change	In terms of climate change mitigation there could be potential for the site to reduce local car dependency by introducing new commercial services within the village, though the small scale of the site and the need to relocate the existing uses at Site 694 mean that the net effect is likely to be neutral in relation to additional employment provision. In terms of climate change adaptation, the site is partially affected by an area of surface water flood risk at the site's eastern extent, particularly at the boundary with Site 694. However, the affected area is only a small proportion of the site as a whole and it is likely that it will be possible to mitigate this risk through the design and layout of the final scheme. Additionally, as the site is only available for employment uses, the presence of some limited surface water flood risk does not necessarily make the principle of development inappropriate in principle.	
Landscape and historic environment	The site is currently undeveloped and is rural in character. However, it is considered to have relatively low sensitivity within the landscape. This is because long views into the site from the south and east are already framed to an extent by existing development and because there is limited oversight of the site from the village, giving it only a limited contribution to the village's landscape setting. It is acknowledged that development of significant scale and massing could potentially intrude upon the rural character of the south of the village, though it is considered that this could be mitigated through the development management process to ensure that future proposals have good regard for the prevailing character of the south of the village. The site has no notable sensitivity in relation to any designated heritage assets, though the adjacent dwellings of Old Smithy Cottage and Little Gables have some local historic merit and contribute to a general sense of historic character on the western approach to the village on Boulge Road. The setting of both dwellings would likely be adversely affected by development on the site and the establishment of site access onto Boulge Road. However, neither property is a designated listed building and neither are within a conservation area.	
Land, soil and water resources	The site is within either Grade 2 or Grade 3 agricultural land, giving it potential to comprise 'best and most versatile' land. The land is currently in productive arable use. Development would therefore necessitate the loss of BMV agricultural land. The NPPF is clear that planning policies should enhance the natural environment by recognising the range of benefits of BMV agricultural land.	Red
Population and community	The site is available only for an allocation as employment land, and as such is not available for residential uses. However, the site's allocation would be key to facilitating the delivery of Site 694 and therefore has the potential to support delivery of new housing in the village, meaning that it is possible to identify a positive performance against the population and community SEA objectives indirectly. Providing new employment floorspace will present an opportunity to deliver modern, high quality units which could potentially have positive effects for economic vitality of the plan area in the long term by providing attractive accommodation over the longer term. This has the potential to future-proof employment opportunities in the plan area.	

Health and wellbeing The site is likely close enough to the village centre to walk and cycle, though there is not currently continuous footpath connectivity over the whole distance. In practice it is considered likely that the small population of Long Melford means that businesses on site will continue to be largely patronised by customers from a wider area, the majority of which will likely rely on private vehicles for access. It is considered that this reflects the rural location of the plan area. The site will necessitate the establishment of a new access point, proposed to be located adjacent to the existing properties of Old Smithy Cottage and The Gables. Therefore there will necessarily be an increase in the number of vehicles turning into the site next to these properties. This could potentially lead to adverse effects in relation to localised noise and air quality at the adjacent properties. The lack of footpath at this stretch of road could lead to increased potential for conflict with pedestrians. However, the risk is considered low on the basis that the location of the entrance is unlikely to support existing high levels of pedestrian movement and could be mitigated through detailed matters of design and layout.

Transportation The site is located within walking distance of the majority of the village and therefore is accessible for employees or customers from the village. However, the route between the site and village centre is not continuously served by traffic-free footpaths as the proposed site entrance is positioned on a stretch of Woodbridge Road which has no pavement. There are potential safety implications for pedestrians from a lack of car-free access to the site, though there may be some potential to seek provision of a pavement to link with the existing pavement to village around 200m to the east of the site entrance. The site is close to bus stops with services to Ipswich, though as services are infrequent it is likely that all sites will have a high degree of car dependency. The performance in relation to transportation is considered uncertain on the basis that it will depend to an extent on whether an additional stretch of footpath can be provided through the development process which connects with the existing pavement on Woodbridge Road.

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

Summary of SEA site findings

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

Table 4.2 Summary of SEA site appraisal findings

Site	Biodiversity	Climate change	Landscape/historic env.	Land, soil and water resources	Population and community	Health and wellbeing	Transport	
Site 251	Yellow	Red	Yellow	Red	Yellow	Yellow	Yellow	
Site 367	Yellow	Yellow	Yellow	Red	Green	Yellow	Yellow	
Site 534	Blue	Yellow	Yellow	Red	Green	Green	Yellow	
Site 694	Green	Red	Green	Green	Green	Yellow	Red	
Site 784	Yellow	Yellow	Red	Red	Green	Yellow	Red	
Site 891	Blue	Yellow	Yellow	Yellow	Green	Green	Yellow	
Employment Site	Yellow	Yellow	Yellow	Red	Green	Yellow	Blue	
Key								
Likely adverse effect (without mitigation measures)				Red	Likely positive effect			Green
Neutral/no effect				Yellow	Uncertain effects			Blue

Assessment of reasonable alternatives

- 4.15 In light of the above assessment, the spatial strategy options considered as reasonable alternatives for delivering Bredfield's housing need of at least 20 dwellings to 2036 are as follows:
- **Option 1:** Site 534, Site 694 and the employment site at Land west of The Forge, delivering up to 20 dwellings and new employment land (preferred option).
 - **Option 2:** Site 534 and Site 784, delivering up to 22 dwellings (retain existing employment land).
 - **Option 3:** Site 367 and Site 784, delivering up to 24 dwellings (retain existing employment land and provide alternative to Site 534).
- 4.16 Two sites were discounted on the basis of being either unsuitable or unavailable for residential development. **Site 251** was not nominated for residential use and is therefore considered unavailable for residential allocation, whilst **Site 944** was withdrawn from consideration by the landowner and is therefore no longer available for allocation.
- 4.17 Site **891** has capacity for only 3 dwellings. It is therefore not considered suitable to form part of the reasonable alternatives as it makes too small a contribution to housing delivery in isolation and is not necessary to allocate in combination with other larger sites.
- 4.18 The reasonable alternatives therefore explore the potential allocation of combinations of two sites from **Site 367, Site 534, Site 694** and **Site 784** as the only reasonable options for delivering Bredfield's housing need of at least 20 dwellings to 2036. Each of the sites is of sufficient size to deliver at least half of Bredfield's housing need to 2036, meaning allocation of no more than two is necessary in total.
- 4.19 Sites 534 and 694 perform best overall in the SEA site assessment though neither features in each of the reasonable alternatives. This is because at Site 534, support for the principle of development cannot necessarily be assumed in light of the site's planning history. At Site 694 housing delivery is dependent on the relocation of the existing employment premises to the employment site at Land west of The Forge and it is therefore appropriate to also test an option which does not require enabling development to come forward.
- 4.20 Site 367 is principally constrained by settlement form, which is considered challenging to mitigate, whilst Site 784 is principally constrained by landscape sensitivity, which is considered potentially possible to mitigate through sensitive design, layout and massing. Site 784 is therefore considered to be a stronger candidate as an alternative site to Site 694 in a 'retain existing employment land' option.
- 4.21 The findings of the appraisal of Option 1, Option 2 and Option 3 are presented below. To support the assessment findings, the options have been ranked in terms of their sustainability performance against the relevant SEA theme. This will provide an indication of the comparative sustainability performance of the three options in relation to each theme.

Option 1: Site 534, Site 694 and the employment site at Land west of The Forge, delivering up to 20 dwellings and new employment land (preferred option).

Option 2: Site 534 and Site 784, delivering up to 22 dwellings (retain existing employment land).

Option 3: Site 367 and Site 784, delivering up to 24 dwellings (retain existing employment land and provide alternative to Site 534).

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		Opt 1	Opt 2	Opt 3
Biodiversity	The Neighbourhood Area is not notably constrained by biodiversity designations and there are there is consequently little to distinguish between the options in terms of effects upon national and international designations. However, Options 1 and 2 would deliver up to 10 dwellings adjacent to an area of Traditional Orchard Biodiversity Action Plan (BAP) priority habitat at Tudor Cottage to the north of Site 534. Option 3 would take forward development in locations with relatively few biodiversity constraints. Whilst direct impacts on the habitat from land take and fragmentation are not anticipated through the options, disturbance may take place from noise, light pollution or trampling from enhanced access. Nevertheless, the low level of constraint under Option 3 is a notable positive and it therefore performs most strongly.	2	2	1
Climate change	The rural nature of Bredfield, particularly its relatively limited service offer and distance to higher-tier service centres, means that all options are considered to perform on a par in terms of minimising contributions to climate change via reducing the need to travel. All options are considered to deliver development within reasonable walking and cycling distance of the main village services and facilities, though Options 2 and 3 would direct a proportion of development to an area of the village with poor existing provision for pedestrians and this would likely require enhancement. In terms of climate change adaptation, there is potentially greater scope to differentiate between options. None of the options are affected by fluvial flood risk, though each includes a degree of surface water flood risk. Option 1 is most notably affected, with around 70% of Site 694 within areas of surface water flood risk. This includes areas of low risk (i.e. annual risk of between 0.1% and 1%) as well as an area of medium risk around the site's entrance (i.e. annual risk of between 1% and 3.3%). There is low risk within Land west of The Forge allocated through Policy BDP.9 for the relocation of employment uses. Option 3 also includes notable surface water flood risk as around 30% of the centre of Site 367 is affected, including a small area of medium risk. However, there could be potential to mitigate this through design and layout, particularly as much of the site is low risk. Option 2 is considered least affected as Site 534 is unaffected by flood risk of any kind and only a small proportion of Site 784 is affected by low surface water flood risk, with potential to mitigate through design and layout.	3	1	2

Option 1: Site 534, Site 694 and the employment site at Land west of The Forge, delivering up to 20 dwellings and new employment land (preferred option).

Option 2: Site 534 and Site 784, delivering up to 22 dwellings (retain existing employment land).

Option 3: Site 367 and Site 784, delivering up to 24 dwellings (retain existing employment land and provide alternative to Site 534).

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		Opt 1	Opt 2	Opt 3
Landscape and historic environment	<p>Option 1 performs well overall in terms of effects on Bredfield's built heritage, its landscape setting and its townscape. This is largely in light of the fact that this option will facilitate the redevelopment of The Forge employment site at Site 694, and therefore presents an opportunity to improve the quality of the built environment at a prominent location at the southern approach to the village. Redevelopment of Site 694 would therefore likely enhance the townscape character of the village, whilst being of lower landscape sensitivity as a previously developed site. Additionally, the site at Land west of The Forge allocated through Policy BDP.9 for re-provision of employment land is considered to have relatively low sensitivity within the landscape despite being undeveloped. This is because long views into the area are already framed by existing development and because there is limited oversight of the site from the village, giving it only a limited contribution to the village's landscape setting. However, it is significant in heritage terms that Option 1 will include development at Site 534 in light of the refusal of a previous application (DC/16/2748/OUT) on the basis of effects on the setting of the adjacent Grade II listed building at Tudor Cottage. Sensitive design and layout will be key to ensuring development at the site is possible.</p> <p>Option 2 also directs development to Site 534 and therefore shares the heritage constraints outlined above. However, the Option performs less strongly than Option 1 as it includes no previously developed land and instead directs development to Site 784 which is open, undeveloped and rural in character. It is considered that Site 784 makes a strong contribution to the rural character and setting of the village more broadly, and although there can theoretically be opportunities to mitigate landscape sensitivity through design and layout, the highly open nature of Site 784 is considered unlikely to afford such opportunities.</p> <p>Option 3 performs weakest as development of Site 367 would likely be inconsistent with the established and characterful linear settlement pattern of the village, whilst development at Site 784 could potentially result in significant negative effects on the rural setting and character of the southern extent of the village and its approach, as outlined above.</p>	1	2	3

Option 1: Site 534, Site 694 and the employment site at Land west of The Forge, delivering up to 20 dwellings and new employment land (preferred option).

Option 2: Site 534 and Site 784, delivering up to 22 dwellings (retain existing employment land).

Option 3: Site 367 and Site 784, delivering up to 24 dwellings (retain existing employment land and provide alternative to Site 534).

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		Opt 1	Opt 2	Opt 3
Land, soil and water resources	<p>The nationally available Agricultural Land Classification (ALC) dataset indicates that the Neighbourhood Area lies within an area of Grade 2 or Grade 3 agricultural land, though this is not subdivided into Grade 3a and 3b. The NPPF is clear that Grades 1, 2 and 3a are considered to be 'best and most versatile' (BMV) land, and there is a presumption against the unnecessary loss of BMV land. Where land is not subdivided into 3a and 3b, as is the case in Bredfield, it is assumed that there is potential for it to be BMV land. In this context, all Options have potential to involve the loss of BMV land.</p> <p>Option 1 directs development in part to previously developed land, though this is only made possible through the allocation of Land west of The Forge which is greenfield and in agricultural use. Additionally, Site 534 is in productive agricultural use though it is considered that the principle of development at the site is potentially not unsuitable in terms of agricultural land quality, as the decision notice for application DC/16/2748/OUT does not identify this as a reason for refusal.</p> <p>Therefore, Option 2, which also directs development to Site 534, is also considered to benefit from the assumption that the principle of development at the site is potentially suitable in agricultural land quality terms. However, the Option also directs development to Site 784 which is a large open field in productive agricultural use and where no planning application has tested the principle of loss.</p> <p>Option 3 is considered to perform broadly on a par with Options 1 and 2 as it also directs development to the sensitive Site 784, though additionally includes Site 367 which, although undeveloped, is severed from the surrounding farmland and does not appear to have an agricultural function.</p>	=	=	=
Population and community	<p>The key considerations in terms of population and community include catering for current and future residents' needs, improving access to services and facilities, promoting a more self-contained community and providing a range of good quality housing. In this context Option 1 performs most strongly, because in addition to delivering new housing nearest to the village's key services and facilities it will also necessitate the provision of new, higher quality employment space which may help protect and enhance Bredfield's economic vitality as development is contingent on employment land development. This may help to promote a more self-contained community by expanding the level of service offer within the village.</p> <p>Option 2 and Option 3 are considered to perform broadly on a par with each other as they both have potential capacity to make a greater-than-minimum contribution to housing need (22 dwellings and 24 dwellings respectively) though do not deliver any new employment space.</p>	1	2	2

Option 1: Site 534, Site 694 and the employment site at Land west of The Forge, delivering up to 20 dwellings and new employment land (preferred option).

Option 2: Site 534 and Site 784, delivering up to 22 dwellings (retain existing employment land).

Option 3: Site 367 and Site 784, delivering up to 24 dwellings (retain existing employment land and provide alternative to Site 534).

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		Opt 1	Opt 2	Opt 3
Health and wellbeing	<p>The key health and wellbeing assets in Bredfield are the sport and social hubs of the playing field, village hall, bowling green, tennis courts and children's play area, all of which are all clustered at the north of the village immediately adjacent to Site 534. Additional contributing factors to health and wellbeing include the capacity of residents to travel by foot or by bicycle as well as access to healthcare services. In this context Option 1 and Option 2 perform most strongly as they direct development partly to Site 534. These Options, via Site 534, will also deliver development in very close proximity to the village shop, which in the context of small rural communities such as Bredfield can provide a further social hub with associated benefits to wellbeing more broadly.</p> <p>Option 3 directs development further from the above health and wellbeing assets and consequently performs less strongly. However, it is recognised that in practice all Options deliver development within reasonable walking and cycling distance of key village services, and all Options offer opportunities to access the rural public rights of way (PRoW) network. However, enhanced pedestrian access is likely to be necessary under all Options as none of Site 694, Site 784 or Land west of The Forge currently benefit from a pavement or dedicated pedestrian-only access all the way to the village centre.</p>	1	1	3
Transportation	<p>All Options would direct development to locations within walking distance of the key village services of the shop, village hall, sports fields, bowling green, church and bus stops. It is noted that the village pub has permanently closed though if it were to be brought back into use this is also within walking distance. All Options would ensure development is reasonably proximate to bus stops with services to Ipswich. However, as services are infrequent it is likely that overall there will continue to be a high degree of car dependency as per the identified baseline position. It is therefore considered that all Options perform broadly on a par in terms of transportation.</p>	=	=	=

Summary of assessment

The assessment finds that **Option 1** performs notably well in relation to a number of themes, outperforming one or both of the other options in terms of: Landscape and Historic Environment; Population and Community; and Health and Wellbeing. However, Option 1 performs weakest in relation to Climate Change adaptation, as much of Site 694 and Land west of The Forge lie within an area of low or medium surface water flood risk. Whilst this is not an absolute constraint, in that mitigation can potentially be achievable through design and layout of development or the use of sustainable drainage systems (SuDS), it is likely to influence the nature of any future scheme. Conversely, it is apparent that **Option 2** performs notably well in terms of Climate Change adaptation. However, Option 2 consistently performs lower than or equal to Option 1 in other themes though is not substantially weakest in any. **Option 3** performs notably weakly in terms of likely effects on Landscape and Townscape, as it would direct development to Site 367, which is perpendicular to Woodbridge Road and jars sharply with the established linear settlement pattern, and to Site 784, which supports long views in and out of the south of the village, and is sensitive within the landscape. Option 3 performs marginally strongest in terms of Biodiversity, though this is simply because it directs development away from the BAP Priority Habitat north of Site 534 and it is considered this is only a marginal benefit given the potential for mitigation and the potential for delivering enhancements to local ecological networks. It is not possible to meaningfully differentiate between the Options in terms of Transportation. Whilst it is recognised that equal weighting cannot be given to each theme,

Option 1: Site 534, Site 694 and the employment site at Land west of The Forge, delivering up to 20 dwellings and new employment land (preferred option).

Option 2: Site 534 and Site 784, delivering up to 22 dwellings (retain existing employment land).

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

and that the assessment conclusions do not comprise a sum of the overall scores, it is nonetheless considered that **Option 1** is the strongest performing development scenario for Bredfield.

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

- 4.22 The sites proposed for allocation in the Neighbourhood Plan are **Site 534** (Land South of Tudor Cottage) **Site 694** (The Forge) and the employment site (Land west of The Forge). These three site options were identified from the pool of 'Issues and Options' sites which the 2018 AECOM site assessment found to be potentially suitable for development, subject to mitigation of identified issues¹². Individually, the preferred residential sites also performed most strongly in the SEA site assessment and perform most strongly overall in combination with each other when tested against the reasonable alternatives.
- 4.23 On this basis, a spatial strategy option similar to Option 1 is selected as the preferred approach by the Parish Council as it is considered to align best with the Plan's objectives and perform most strongly in terms of integrating with the existing built area of the village and focussing growth at areas which generated community support in the Individual Questionnaire circulated by the Parish Council in 2017.¹³

¹² AECOM (2018), 'Bredfield Neighbourhood Plan: Site Assessment Final Report' [online], available from: <http://bredfield.onesuffolk.net/assets/Bredfield-Site-Assessment-Final-Report-180514.pdf>

¹³ Bredfield Parish Council (2017), 'Bredfield NHP Survey Summary' [online], available from: <http://bredfield.onesuffolk.net/assets/Uploads/PDF-folder/Survey-summary-combined-results-PDF-27-Jan-17.pdf>

5. Appraisal findings at this stage

Introduction

5.1 The Neighbourhood Plan contains 17 policies, listed below:

Policy theme	Policy
Natural Environment	BDP.1 - Maintaining distinctive views
	BDP.2 - Maintaining the landscape
	BDP.3 - Maintaining priority habitats
	BDP.4 - Green spaces
Historic Environment	BDP.5 - Locally valued heritage assets
	BDP.6 - Protecting archaeological sites
Business	BDP.7 - Farming and agriculture
	BDP.8 - Small scale business and tourism
	BDP.9 – Expansion of business premises
Transport and Traffic	BDP.10 - Vehicle parking
	BDP.11 - Transport considerations
Housing	BDP.12 - Future housing
	BDP.13 - Location of development
	BDP.14 - Scale of development
	BDP.15 – Sites for development
	BDP.16 - Preserving character
	BDP.17 - Re-use of redundant buildings

5.2 The submission Neighbourhood Plan policies are assessed below under seven headings, one for each of the SEA themes identified through the scoping exercise.

Biodiversity

5.3 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 Neighbourhood Plan of the importance of avoiding harm to Bredfield’s natural environment and the significance of Bredfield’s natural environment to many facets of village life. Consequently, whilst Policies **BDP.2** and **BDP.3** directly address biodiversity there are a number of other policies with biodiversity implications.

5.4 Policy **BDP.2** lists biodiversity supporting habitats to be protected or enhanced through the development process, including “*existing trees, hedges, shrubs and other vegetation*” and “*existing ponds, streams and hedge banks*”. Policy **BDP.3** attaches specific importance to the protection and enhancement of key biodiversity-supporting habitats including “*hedgerows and field margins, mixed deciduous woodland, meadows, streams, ponds and traditional orchards*” and is clear that development will be supported only where it will “*enable the protection and enhancement*” of such features. The Neighbourhood Plan effectively adopts the habitat definitions of the UK Biodiversity Action Plan. This provides a standardised set of definitions which could help avoid disputes and ambiguity though it may not capture the finer grain of site specific biodiversity assets which sit outside the relatively broad brush BAP designations. However, this is considered adequate as site specific impacts will be considered at the application stage should a

specific scheme come forward. The commitment to seek enhancement is considered appropriate in the context of the SEA objectives though there may potentially be limited opportunities to achieve this on very small developments.

- 5.5 Biodiversity could be impacted by other policies as well. Policy **BDP.4** says that development will not be supported where it may result in harm to a designated Local Green Space. Maintaining the integrity of open space in and around the village is considered likely to support both the habitats of local wildlife and ecological networks for wildlife to move between habitats.
- 5.6 Policy **BDP.7** provides support in principle for agriculture and arboriculture provided there is no “*material detrimental effect on the surrounding environment [or] landscape*”. Whilst seeking the avoidance of environmental harm is likely to be positive for biodiversity there is no commitment to seeking biodiversity net gain from future agricultural development. BDP.7 lists a number of other criteria as determining factors in whether agricultural development will be supported. This suggests there is potential for weighting to be applied to decision making which in turn may suggest environmental concerns could potentially be outweighed by other factors. These other criteria include business viability, impact on traffic, level of economic benefit and impact on historic buildings. Whilst this is considered appropriate in a broad sense, in terms of the biodiversity SEA theme there could be potential for BDP.7 to support development whose benefits outweigh potential harm to biodiversity supporting habitats.
- 5.7 Policy **BDP.15** allocates Site 534 and Site 694 as sites for housing. BDP.15 clearly notes that development at Site 534 should incorporate a “*landscaping scheme*” to “*provide for an improvement in biodiversity*”. Whilst it is not immediately clear why Site 694 and Land west of The Forge do not also have this requirement it is considered that the inclusion of biodiversity enhancement within BDP.15 demonstrates that the Neighbourhood Plan attaches importance to biodiversity.
- 5.8 A number of further policies - **BDP.5**, **BDP.8** and **BDP.16** - include protection and enhancement of landscapes, setting or openness. On the basis that much of the landscape around Bredfield is rural and unspoilt it is considered reasonable to assume that protecting landscapes is likely to also preserve a range of biodiversity supporting habitats.
- 5.9 It is considered that the Neighbourhood Plan is likely to have a **positive effect on the biodiversity SEA theme**.

Climate change

- 5.10 The climate change SEA theme has the dual focus of reducing the contribution of the Neighbourhood Plan area to climate change and supporting resilience to the potential effects of climate change, including flooding.
- 5.11 However, the plan does not include a requirement for new development to incorporate sustainable drainage features which could have represented a meaningful contribution to climate change resilience.
- 5.12 In terms of climate change mitigation, as existing development in Bredfield is limited and does not include high-emissions land uses the baseline for contributions to climate change is low. There are no policies in the Neighbourhood Plan considered likely to substantially increase emissions-generating activity, though it is recognised that by introducing additional dwellings Policy **BDP.15** will also increase the built footprint of the Neighbourhood Plan area, leading to additional emissions. However, the phased addition of 20 dwellings over the plan period is considered unlikely to substantively affect emissions.
- 5.13 Policy **BDP.15** has potential to have a greater effect in relation to Climate Change adaptation, as the allocations of Site 694 and the employment site at Land west of The Forge are in an area partially affected by low and medium surface water flood risk. However, there is potential to mitigate surface water flood risk both through technical interventions and through design and layout on both sites, though it is acknowledged the most robust mitigation is to avoid development in the risk-affected areas. It is notable that the policy does not acknowledge the inherent surface water flood risk at the site and does not therefore require on-site mitigation to be delivered as part of any future scheme, though provisions within local and national planning policy are considered likely to limit potential negative effects.
- 5.14 Policy **BDP.4** and its supporting text recognise that green infrastructure “*can deliver a wide range of environmental ... benefits*” and that “*expansion is to be encouraged and supported*”. 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 within the Neighbourhood Plan area is therefore an important way in which the Bredfield Neighbourhood Plan can help promote climate change adaptation measures. This is supported by Policy BDP.2 which seeks to retain “*as many of the existing trees, hedges, shrubs and other vegetation as possible*”, whilst also protecting other natural features such as ponds and hedge banks.

- 5.15 In this context it is considered that the Neighbourhood Plan is likely to have a **neutral effect on the climate change SEA theme**.

Landscape and historic environment

- 5.16 The landscape and historic environment SEA theme looks to protect and enhance the quality both of the historic environment and of townscapes and landscapes. Bredfield is a rural parish in a largely agricultural landscape setting and the Neighbourhood Plan contains a number of policies which directly or indirectly address landscape and heritage matters.
- 5.17 Policy **BDP.1** and **BDP.2** are principally concerned with landscape matters and demonstrate the value which the Neighbourhood Plan attaches to landscape. BDP.1 says that existing landscape character, open green space and distinctive views must be respected by new development. The policy identifies four specific distinctive views which must not be compromised by new development. These are described and illustrated later in the plan. BDP.2 complements this with a broader approach by identifying landscape features which should be protected and enhanced, as listed under the biodiversity topic heading above. Assigning protection both to specific key views and to landscape features more broadly is considered to represent a comprehensive approach to preventing harm to landscapes and provides a clear suite of landscape character features which could be enhanced through additional provision in new development.
- 5.18 Policy **BDP.16** focusses on preserving the village’s distinctive character by requiring all new development to “*be in harmony*” with existing built character and the wider landscape context. This relates to the design, materials, plot size and parking provision of any new schemes along with the relationship with surrounding buildings and spaces.
- 5.19 Policy **BDP.9** allocates Land west of The Forge for employment use, specifically to enable the relocation of existing businesses at Site 694. The land is open and underdeveloped but its landscape sensitivity is limited by the presence of the existing built area of the village to the north and east. Views into the site from the south and west are therefore partially framed by the existing built area and the site’s openness is considered to only make a limited contribution to the setting of the village as a result.
- 5.20 Agriculture forms a key element of the rural setting of Bredfield and so it is considered that **Policy BDP.7** which provides in-principle support for agricultural development could help contribute to the agricultural function of the area and the particular character this imparts on the landscape.
- 5.21 In terms of the historic environment the Plan contains two key policies, one for heritage assets, such as listed buildings, and a second for sites of archaeological interest. Policy **BDP.5** notes that the Plan will establish a new local listing mechanism for Bredfield which identifies “*certain buildings, monuments, sites, places, areas or landscape*” of sufficient value to be protected from development. The policy goes on to note that this list will be ‘live’ and “*the Council have the power to add buildings etc to the List or remove them therefrom*”. Policy **BDP.6** proposes similar protection for archaeological features and whilst a list of such features is provided the policy is clear that protection is extended to all features of archaeological interest whether or not they appear on the list. It is considered that together Policies BDP.5 and BDP.6 represent a comprehensive approach for protecting historic assets in the Neighbourhood Plan area.
- 5.22 Policy **BDP.15** allocates Site 534 at Land South of Tudor Cottage which is notable for having recently had a planning application refused on the grounds of harm to the setting of Tudor Cottage which is Grade II-listed.¹⁴ In light of this, the policy directly addresses heritage concerns, stating that:
- “*development should be set back from the main road, and not obstruct the aspect of Tudor Cottage*”;
 - “*a landscaping scheme should be implemented to mitigate the effect on Tudor Cottage*”;

¹⁴ Application reference DC/16/2748/OUT

- *“vehicular access to the site should be at the southern side, and not compromise Tudor Cottage”;*
- 5.23 Policy **BDP.15** also allocates Site 694 at The Forge which is a brownfield site and is considered to be well integrated into the built environment. No significant landscape or heritage effects are anticipated, and there could be opportunities to improve the quality of the existing built environment through redevelopment.
- 5.24 It is considered that the Neighbourhood Plan is likely to have a **positive effect on the landscape and historic environment SEA theme**.

Land, soil and water resources

- 5.25 The focus of the land, soil and water resources SEA theme is split three ways; ensuring the efficient and effective use of land, encouraging reduction, re-use and recycling of waste and sustainable management of water resources. 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 a small village like Bredfield this principle is significant, partly because the village is surrounded by land in use as agriculture, the development of which could harm productive agricultural land, and partly because the existing Physical Limit Boundary of the village is tightly drawn around the village to help preserve the character and quality of the built environment.
- 5.26 A number of policies are relevant to this theme. Policy **BDP.17** supports in principle the *“conversion of redundant farm, business or commercial buildings”* where they are *“no longer viable or needed in the present role”*. This is considered to represent a pragmatic and appropriate approach to achieving the efficient and effective use of existing resources within the village in terms of reducing the need for new development on greenfield sites whilst also ensuring that redundant buildings contribute positively to the streetscape/landscape and do not become derelict.
- 5.27 Policies **BDP.2** and **BDP.3** focus on the protection and enhancement of landscape and habitats which has implications for land management. For example, BDP.2 seeks to retain *“existing trees, hedges, shrubs and other vegetation”* and BDP.3 says for development proposals to be supported they must *“enable the protection and enhancement of key features of the landscape, including hedgerows and field margins”*. This suggests that new development will need to incorporate or re-provide such features, potentially supporting soil and water quality through supporting the ability of natural processes to dissipate pollutants.
- 5.28 Policy **BDP.15** allocates Site 534 on open agricultural land which appears to be in productive use and will therefore inevitably lead to some loss of productive agricultural land. Similarly, Policy **BDP.9** allocates Land west of The Forge for development as employment land. The existing agricultural land at both sites has potential to be ‘best and most versatile’ (BMV), the unnecessary loss of which is strongly discouraged by the NPPF.
- 5.29 Policy **BDP.13** sets out how the village’s Settlement Boundary will be amended to accommodate residential site allocations and commitments as well as the proposed new employment site allocated through Policy BDP.9. Although the extended Settlement Boundary will enable development on land currently in agricultural use, it is considered that by establishing a revised boundary which enables Bredfield’s housing need to be met, BDP.13 will help prevent piecemeal speculative development on less appropriate sites and in this sense makes a positive long term contribution.
- 5.30 In light of the loss of productive agricultural land with potential to be ‘best and most versatile’ at Site 534 and at Land west of The Forge, it is considered that the Neighbourhood Plan is likely to have a **negative effect on the land, soil and water resources SEA theme**.

Population and community

- 5.31 The population and community SEA theme has a broad scope, seeking to:
- Cater for the needs of existing and future residents and different groups within the community;
 - Improve access to community services and facilities;
 - Provide an appropriate mixture of dwelling sizes, types and tenures.

- 5.32 The emerging Local Plan Review identifies a housing need for Bredfield of 30 dwellings to 2036, with ten of these being delivered via the permitted scheme at Site 459. This means the Neighbourhood Plan must deliver at least 20 additional dwellings over the plan period.
- 5.33 Policy **BDP.15** identifies three sites as appropriate for housing delivery, Site 459, Site 534 and Site 694. In the context of the allowed scheme for 10 dwellings at Site 459 the site is not an allocation, meaning just the two remaining sites are allocated in the plan. If delivered in full this will lead to the provision of up to 20 new dwellings in the village, and contribute to meeting Bredfield's identified housing need to 2036 in full. This is a significant positive.
- 5.34 Policy **BDP.15** also says that Site 534 will be required to deliver "*a new footpath link ... between the development and the village centre*" which will contribute to improving access to the hub of community facilities at the shop/village hall/playing fields complex.
- 5.35 Policy **BDP.12** focuses on achieving housing mix within new development to "*attract younger people into the village, or those downsizing*". This is in the context of the plan's identification of a lack of diversity in the "age profile" of the village as an issue, along with the lack of housing available to first time buyers and residents seeking to downsize. Diversifying housing mix can be an effective way of catering for the different housing needs of existing and prospective residents as the introduction of greater choice of type and tenure can release larger houses to the market and enable younger residents and families to stay in the village rather than move elsewhere.
- 5.36 Policy **BDP.13** highlights that the Settlement Boundary of the village will be "*extended to incorporate land recognised as being suitable for development in to be included in the contiguous main built up area*". It is considered that this is a sufficiently accommodating form of words to indicate support in principle both for the allowed scheme at Site 459 and for the proposed site allocations, as well as the land allocated for employment use through Policy BDP.9. Policy BDP.13 is therefore considered to contribute to meeting the housing needs of existing and future residents through its support of an expanded Settlement Boundary.
- 5.37 Policy **BDP.9** allocates Land west of The Forge for the "*relocation of existing businesses*". The policy requires businesses on site to be small scale, i.e. "*businesses with up to nine employees*". This reflects the nature of existing businesses in situ at Site 694 though the new site is more than double the area of the existing employment site which offers the potential to meet additional needs of the plan area and beyond. The provision of new high-quality employment space will have potential to enable local enterprises to both remain in the local area or locate there if currently located elsewhere due to lack of available floorspace. A thriving local economy is an important element of ensuring the ongoing vitality of settlements and it is considered that the policy will contribute to this. The policy does not specify a total quantum of employment floorspace to be delivered, though it is noted that the identified site is more than twice the size of the existing employment site, offering potential to deliver a net gain in employment floorspace should the market support it. It is considered that this will lead to positive effects in relation to catering to the existing and future needs of local residents.
- 5.38 It is considered that the Neighbourhood Plan is likely to have a **positive effect on the population and community SEA theme**.

Health and wellbeing

- 5.39 The health and wellbeing SEA theme aims to improve the health and wellbeing of residents in the Neighbourhood Plan area. Health and wellbeing are influenced by a wide range of factors which will vary by local context, some of which are realistically beyond the scope of the Neighbourhood Planning process. However, in terms of factors such as maintaining an attractive living environment, encouraging and enabling modal shift to cycling and walking and providing or enhancing access to recreation facilities there are a range of potential opportunities to facilitate positive effects through planning.
- 5.40 Policy **BDP.11** positions walking and cycling provision as a priority consideration for new development, reflecting the importance the Plan places on enabling residents of new homes to have the opportunity to make journeys within the village without needing a car. The policy says that new development should address considerations including:

- *“provision of safe walking and cycling routes” which “establish walkable access to services and facilities in the village”;*
 - *“opportunities to extend existing routes for walkers and cyclists and to accommodate people of all ages and abilities”;*
- 5.41 Policy **BDP.15** reflects this, stating that development at Site 534 in particular should provide *“a new footpath link ... between the development and the village centre”*.
- 5.42 Policy **BDP.1** focuses on maintaining identified distinctive views into and out of the village which are illustrated in Appendix E of the plan. Appendix E specifically notes that both View 1 and View 2 are sufficiently expansive and attractive that each one *“promotes personal wellbeing with a sense of space* Protecting these views from inappropriate development will therefore be important to preserve the setting of the village and the character of rural life.
- 5.43 Policy **BDP.4** provides support in principle for *“development proposals that safeguard, and/or provide opportunities to improve the quality and quantity of public access to green space”*. This is considered likely to result in positive effects on health and wellbeing for both existing and new residents. In the context of the proposed allocation at Site 534 being immediately adjacent to the village’s sports fields and recreation space it is considered that there could be opportunities to provide direct linkages between the site and the fields which BDP.4 could help achieve. The supporting text of BDP.4 also recognises the *“wide range of ... quality of life benefits for the local community”*. This acknowledges more broadly the potential for green infrastructure to have positive effects in relation to health and wellbeing by promoting healthier, more active lifestyles.
- 5.44 Policy **BDP.9** allocates Land west of The Forge for employment use. In absolute terms the site is likely to be within reasonable walking distance of the village centre, nearby bus stops and many of the existing residents which is positive in principle. Nevertheless, it is considered that many of the users of the site will be travelling to and from the site from further afield, meaning that opportunities to limit or reduce car dependency or encourage modal shift are likely to be very limited. However, the rural nature of the village means that such a degree of car dependency is likely to be inevitable and the Neighbourhood Plan’s policies and allocations should be seen in this context. The site is more than twice the size of the existing employment site at Site 694 meaning there could be a net increase in the number of vehicle movements associated with the site, with associated effects on localised noise and air quality at adjacent dwellings.
- 5.45 Overall, it is considered that the Neighbourhood Plan is likely to have a **positive effect on the health and wellbeing SEA theme**.

Transportation

- 5.46 The transportation SEA theme aims for the promotion of sustainable transport modes and minimising the need to travel where possible. In rural areas with a limited service offer and which are some distance from higher tier service centres this can be challenging, particularly where development proposed is not of a scale likely to make enhanced public transport provision viable. The submission Neighbourhood Plan summarises a range of community concerns relating to traffic and road safety in Bredfield, particularly traffic speed, volume of HGV traffic and inadequate provision of pavements.
- 5.47 Policy **BDP.11** sets out criteria against which applications for new developments will be expected to demonstrate consideration. This includes consideration of:
- *“provision of safe walking and cycling routes ... to services and facilities in the village”;*
 - *“opportunities to extend existing routes”;*
 - *“[how] off road parking and traffic calming measures will encourage low vehicle speeds”;*
 - *“how proposals link with public transport”;*
 - *“Impacts of the traffic arising from the development”;*
- 5.48 This policy approach is considered to represent an appropriate response to mitigating some of the localised identified transport issues within Bredfield village and ensuring that new development addresses, rather than contributes to, these issues. In particular, a requirement to consider providing new safe walking

and cycling routes and extending existing routes where possible could help integrate new development with the village core and link to existing bus services. Whilst recognising there are limits to the extent small development can effect infrastructure changes it is considered that this represents a sound principle for new development and that there could be a number of potential mechanisms for achieving these objectives in practice when a scheme comes forward on the site allocations.

- 5.49 Policy **BDP.9**, which allocates Land West of The Forge as an employment site, requires that development on site *"will not result in significant increase in heavy vehicular traffic on the roads in the vicinity of the premises of elsewhere in and around the parish"*. However, Land west of The Forge is more than twice the size of the existing employment site at Site 694 meaning there is potential to deliver a net gain in employment floorspace if the site were to be developed in full. This could therefore lead to a net increase in the number of vehicle movements associated with the site. However, it is unlikely that there will be an effect on the number of HGV movements through the village as the policy seeks to limit the size of businesses on the new site to "micro-enterprises" which are unlikely to be HGV-generating. Existing flows of HGVs through Bredfield appear unrelated to activity within the village itself and Policy BDP.9 appears unlikely to alter this.
- 5.50 Policy **BDP.10** focusses specifically on parking standards, adopting the Suffolk-wide guidance on parking standards as a policy requirement for new development. In a village with limited capacity for on-road parking and established traffic concerns it will be important for new development to meet its own need in terms of parking need. Aligning BDP.10 with existing guidance is considered an appropriate approach as this strengthens the guidance from optional to necessary. Policy **BDP.9** extends this requirement specifically to the allocation of Land west of The Forge and adding that the new employment site should *"provide enough off-street parking to accommodate workers and visitors"*. It is considered that this is a suitable response to the potential for an increased need for employment-related parking on site.
- 5.51 It is considered that the Neighbourhood Plan is likely to have a **positive effect on the transportation SEA theme**.

Conclusions at this stage

- 5.52 The appraisal finds that the plan as a whole is likely to lead to positive effects in relation to five SEA themes: 'Biodiversity'; 'Landscape and historic environment'; 'Population and community'; 'Health and wellbeing' and 'Transportation'. Neutral effects are anticipated in relation to the 'climate change' SEA theme. Negative effects are anticipated in relation to the 'land, soil and water resources' SEA theme.
- 5.53 The range of positive effects are anticipated in light of the plan's potential to seek biodiversity net gain at the three preferred site allocations; the fact that development will include opportunities to rejuvenate the low quality built environment at The Forge site; that delivery of housing will be in appropriate locations and have potential to meet local needs; that new development will be required to contribute new or enhanced walking or cycling connectivity with the village's green spaces; and that new development will be expected to avoid contributing to on-street parking and link well with available public transport.
- 5.54 Neutral effects are anticipated in relation to the 'climate change' SEA theme because whilst the plan recognises the role that retaining and enhancing green infrastructure can play in increasing resilience to climate change, particularly increased flood risk, it also allocates Site 694 and Land west of The Forge at which there are areas of medium surface water flood risk. Although surface water flood risk can potentially be mitigated through appropriate design and layout, it is not possible to conclude positive effects in light of the SEA climate change objectives.
- 5.55 Negative effects are anticipated in relation to the 'land, soil and water resources' SEA theme, primarily in light of the fact that the allocation of Site 534 and Land west of The Forge will necessitate the loss of productive agricultural land with potential to be 'best and most versatile'. It is acknowledged that some balance is achieved by allocating the brownfield Site 694 as well, though the brownfield site will only come forward once agricultural land and Land West of The Forge is developed to provide an alternative employment site. In this context it is not possible to conclude positive effects on the SEA land, soil and water resources objectives.
- 5.56 When read as a whole, the Neighbourhood Plan is anticipated to result in broadly positive effects in relation to the SEA framework.

6. Next steps

- 6.1 The Bredfield Neighbourhood Plan and this Environmental Report have been submitted to Suffolk Coastal District Council for Independent Examination.
- 6.2 At Independent Examination, the Neighbourhood Plan has been considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the existing Local Plan.
- 6.3 **This updated version of the report has been prepared following examination and incorporates updates and amendments requested by the examiner.**
- 6.4 If the Independent Examination is favourable, the Neighbourhood Plan will be subject to a referendum, organised by Suffolk Coastal District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Neighbourhood Plan will become part of the Development Plan for Bredfield Parish.

Appendix I: SEA scoping report consultation responses

A summary of representations to the Scoping Report consultation, along with how they have been considered, is presented below.

Table A1 Summary of representations to the Scoping Report consultation

Consultee	Consultation response summary	How the response is considered and addressed
Historic England	<ul style="list-style-type: none"> Suggest addition of 2012 NPPF para 58 to policy context (responding to local character and history and reflect identify of local surroundings) 	Policy context updated accordingly
Natural England	<ul style="list-style-type: none"> No response received 	n/a
Environment Agency	<ul style="list-style-type: none"> Satisfied with SEA scope 	n/a

Appendix II: Summary of baseline data

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

Biodiversity and geodiversity

- There are no biodiversity sites within the Neighbourhood Plan area which have been designated at a national, European or international level. This includes Sites of Special Scientific Interest (SSSI) although parts of the Neighbourhood Plan area fall within SSSI Impact Risk Zones.
- There are also no locally designated sites such as Local Nature Reserves, Local Wildlife Sites or County Wildlife Sites.
- Although there are no substantial areas of ancient woodland there is a small portion of the Dallinghoo Wield Wood ancient woodland site lies within in the Neighbourhood Plan area boundary.
- Some limited areas of Biodiversity Action Plan Priority Habitats are present in the Neighbourhood Plan area, specifically Traditional Orchard, Deciduous Woodland and Woodpasture and Parkland.

Climate change

- An increase in the built footprint of the Bredfield Neighbourhood Plan area (associated with the delivery of new housing) has the potential to increase overall greenhouse gas emissions.
- Most of the Neighbourhood Plan area is not at risk of either fluvial or surface water flooding. However, a very limited area either side of one stretch of Byng Brook falls within Flood Zones 2 and 3 and a more extensive area focussed around a longer stretch of Byng Brook is also risk of surface water flooding.

Landscape and historic environment

- None of the Neighbourhood Plan area is within an AONB and is no part of the Neighbourhood Plan area is within the setting of an AONB.
- There are no scheduled monuments, registered parks and gardens or registered battlefields within the Neighbourhood Plan area.
- 16 listed buildings can be found throughout the Neighbourhood Plan area of which four which are Grade II* and 12 are Grade II.

Land, soil and water resources

- A significant proportion of the Neighbourhood Plan area is underlain by land classified as the best and most versatile agricultural land.
- An area of the Neighbourhood Plan area to the south of Bredfield Village is within ground water Source Protection Zone 3 (total catchment).
- The entire Neighbourhood Plan area is designated as a Nitrate Vulnerable Zone for both ground water and surface water.

Community and facilities

- Between 2001 and 2011 Bredfield's population grew at a rate of 10%, faster than Suffolk Coastal district (8%), the East of England region (8.5%) and England as a whole (7.9%).
- Bredfield has a sizable older population with 58% of residents aged 45 and over and 34% of the population aged 60 and over.

- Deprivation is lower in Bredfield in all dimensions than the district, regional and national averages.
- Bredfield residents are more qualified than the national average with 44% achieving Level 4 qualifications or above compared to a national position of 27%
- Car ownership in Bredfield was 95.7% in 2011, significantly higher than Suffolk Coastal district (86%), the East of England region (81.5%) and England as a whole (74%). This reflects the village's rural location, its limited public transport links and its relative affluence.

Health and wellbeing

- The majority of residents within the Neighbourhood Plan area consider themselves to have 'very good health' or 'good health', broadly aligning to the totals for Suffolk Coastal District, the East of England and England.

Transportation

- Bredfield Neighbourhood Plan area is has limited direct access to public transport networks but has good connections with the Strategic Road Network via the A12.
- There are two railway stations within 15 minutes' drive of the village at Melton and Woodbridge. Both stations are on the East Suffolk line and are served by hourly services to and from London Liverpool Street (via Ipswich).
- The village has a limited bus service. First Group's number 70 service has five services a day between Bredfield and Woodbridge and four services a day between Bredfield and Ipswich. No other bus routes serve the village. There are two bus stops in each direction within Bredfield village, all served exclusively by the number 70.
- High HGV flows through the Neighbourhood Plan area between the A12 and B1078 are of community concern.
- Additional issues of community concern include the level of traffic from neighbouring villages travelling through the Neighbourhood Plan area during peak hours and rising levels of traffic on the A12 which can cause difficulties joining the A12 from the Woodbridge Road and Ufford Road junctions.
- Bredfield village is on the Ipswich to Fakenham section of National Cycle Route 1. A number of Public Rights of Way crisscross the Neighbourhood Plan area.