

**Bungay Neighbourhood Plan**  
**Strategic Environmental Assessment**  
**Post Adoption Statement**  
**January 2023**

**Introduction**

Strategic Environment Assessment (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.

SEA involves a series of procedural steps which are designed to meet the requirements of the SEA Regulations. The final step in the process involves preparing a 'statement' at the time a neighbourhood plan is 'made'. This SEA Post Adoption Statement addresses this under Part 4 of the SEA Regulations.

The SEA Adoption Statement includes information on:

- how environmental and sustainability considerations have been integrated into the Plan
- how the SA/SEA has been taken into account
- how the results of public consultation have been taken into account
- the reasons for choosing the made Plan, in light of the other reasonable alternatives, and
- how any significant sustainability/environmental effects of implementing the Plan will be monitored.

**The Neighbourhood Development Plan**

Bungay Town Council, as the Qualifying Body, applied for Bungay Parish to be designated as a Neighbourhood Area under The Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Area was designated by (the former) Waveney District Council on 13<sup>th</sup> April 2016.

The Bungay Neighbourhood Plan was published by Bungay Town Council for pre-submission consultation (Regulation 14) between 10<sup>th</sup> September and 5<sup>th</sup> November 2021.

Following the submission of the Bungay Neighbourhood Plan (submission version) to East Suffolk Council the Plan was publicised and comments invited between 11<sup>th</sup> April and 6<sup>th</sup> June 2022.

East Suffolk Council, with the agreement of Bungay Town Council, appointed an independent examiner to review the Plan and to consider whether it met the Basic Conditions required by legislation and whether it should proceed to Referendum. The Examiner's Report (received 4<sup>th</sup> August 2022) concluded that, subject to modifications identified in the Report, the Bungay Neighbourhood Plan met the basic conditions.

The referendum for the Bungay Neighbourhood Plan took place on 17<sup>th</sup> November 2022. Following a successful referendum result, the Bungay Neighbourhood Plan was 'made' (adopted) by East Suffolk Council on 23<sup>rd</sup> November 2022 and the Broads Authority on 2<sup>nd</sup> December 2022. From these dates the Neighbourhood Plan forms part of the relevant Development Plan for the determination of planning applications in the neighbourhood plan area.

### **How environmental and sustainability considerations have been integrated into the Plan?**

Strategic Environment Assessment (SEA) of the Bungay Neighbourhood Plan has been conducted in such a way that it meets the requirements of the EU Strategic Environment Assessment Directives (including through EU exit legislation) and UK Government guidance on SEA.

As required by the regulations, SEA has been developed as an iterative process and has informed decision making at every stage of developing the Bungay Neighbourhood Plan.

The first stage of SEA was the production of an SEA screening opinion determination. This was carried out by East Suffolk Council on behalf of Bungay Neighbourhood Plan Working Group. The SEA Screening Opinion Determination (dated February 2021) concluded that the Bungay Neighbourhood Plan was likely to have significant effects on the environment and that SEA was required. Subsequently, SEA was undertaken by Collective Community Planning on behalf of Bungay Neighbourhood Plan Working Group. This work consisted of:

- A Scoping Document dated March 2021.
- Environmental Report dated July 2021.
- Environmental Report dated March 2022.

All reports relating the SEA of the Bungay Neighbourhood Plan can be found at:

<https://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/neighbourhood-plans-in-the-area/bungay-neighbourhood-area/>

### **How the SA/SEA has been taken into account**

Drawing on the review of the sustainability context and baseline, the Scoping Reports (February 2021) identified a range of sustainability issues that should be a focus of the SEA for the Bungay Neighbourhood Plan. From this, an SEA framework was developed. The SEA Framework provides a methodological framework for the appraisal of likely significant effects of the plan on the baseline. The SEA Framework was presented under the following themes:

- Biodiversity
- Climate change
- Landscape
- Water resources, soil and land
- Historic environment
- Population and Health
- Accessibility and Transport

The reasonable alternative site options and spatial strategy alternatives were then appraised against the SEA framework. The conclusions of this, were used to inform the consideration of the alternative options for the Bungay Neighbourhood Plan.

In light of the findings of the spatial strategy options appraisal, the site proposed for allocation in the Neighbourhood Plan was Land East of St Margaret's Road (also known as BNDP-04 Land south of Mountbatten Road, Bungay).

### **How the results of public consultation have been taken into account**

The Strategic Environmental Assessment Directive requires that the authorities referred to in article 6(3) shall be consulted when deciding upon the scope and level of detail of the information to be included in the Environmental Report. In England the key bodies are the Environment Agency, Historic England and Natural England. Article 6(2) of the Strategic Environmental Assessment Directive requires the public to have an early and effective opportunity within appropriate timeframes to express their opinion on the draft plan or programme, and the accompanying Environmental Report, before the adoption of the plan or programme or its submission to the legislative procedure.

The Environment Agency, Historic England and Natural England were consulted on the SEA Screening Opinion and SEA Scoping Report and they were also consulted during respective public consultations throughout the Neighbourhood Plan process. A summary of representations to the Scoping Report consultation, along with how they have been considered, is presented in Appendix B of the SEA Environmental Report (March 2022).

The SEA Environmental Report (March 2022) was consulted upon for eight weeks alongside the Bungay Neighbourhood Plan Regulation 16 Publicity Period held from 11<sup>th</sup> April to 6<sup>th</sup> June 2022.

A report, summarising the consultation undertaken on the Bungay Neighbourhood Plan was published alongside the submission version of the Neighbourhood Plan.

### **The reasons for choosing the made Plan, in light of the other reasonable alternatives**

The Environmental Assessment of Plans and Programmes 2004 (12) (2) requires environmental reports to examine reasonable alternatives for the plan or programme whilst taking into account the objectives and scope of the plan or programme.

The Bungay Neighbourhood Development Plan Potential Site Allocation for Residential Development, Assessment Proforma (June 2019) considered four site allocations:

- Option 1: 1.57ha site BNDP-01 Land at Dukes Bridge, Beccles Road, Bungay close to many facilities.
- Option 2: 7.7ha site, BNDP-02 Land at Grove Farm, Mettingham.
- Option 3: 1.4ha site, BNDP-03 Land between Pilgrim's Way and Wingfield Street, Bungay.
- Option 4: 10.28ha site, BNDP-04 Land south of Mountbatten Road, Bungay (preferred option).

The SEA of the Bungay Neighbourhood Plan considered reasonable alternatives as detailed in the Environmental Report (July 2021, updated March 2022). Two spatial strategy options were considered as reasonable alternatives for delivering Bungay's housing need:

- Option 1: 70 dwellings on BNDP-04
- Option 2: 5 dwellings on BNDP-03 and 65 on BNDP-04

The appraisal of these options is fully set out in the Environmental Report (March 2022). The conclusion of the appraisal led to the allocation of 4.5 hectares of land for approximately 70 dwellings on Land East of St Margaret's Road (which was Option 1 also known as BNDP-04 Land south of Mountbatten Road, Bungay). These two site options were identified from the pool of 'Potential site allocations for residential development: Assessment Proforma (June 2019)' sites which assessed sites put forward for the Waveney Local Plan that were potentially suitable for development, subject to mitigation of identified issues. Individually, the preferred residential site performed most strongly in the SEA site assessment and performed most strongly overall in combination with each other when tested against the

reasonable alternatives. On this basis, a spatial strategy to allocation Option 1 was selected as the preferred approach.

The policies within the submission Neighbourhood Plan were cumulatively assessed under seven headings/ themes of the SEA Framework. The whole plan appraisal (in the SEA Environmental Report, March 2022) found minor long-term positive effects on Biodiversity, minor long-term positive effects on climate change, a neutral impact on the landscape theme, minor long-term negative effects are anticipated regarding water resources, soil and land, long-term positive effect on the historic environment, significant long-term positive impact on the population and health, and minor long-term negative effects accessibility and transport. As detailed in the Environmental Report (March 2022), when read as a whole, the Neighbourhood Plan provides “additional local protections for assets, features and characteristics of value, and identify opportunities for development to address known issues or deliver community benefits. As a result, overall long-term positive cumulative effects are considered likely.”

**How any significant sustainability/environmental effects of implementing the Plan will be monitored.**

Under Regulation 17 of the Environmental Assessment of Plans and Programmes, the Bungay Neighbourhood Plan will be subject to on-going monitoring. This will be carried out by jointly East Suffolk Council and Bungay Town Council. The former will monitor the continuing suitability of the Neighbourhood Plan’s policies, including in terms of significant environmental effects, through its Authority Monitoring Report.