

Bungay Neighbourhood Development Plan



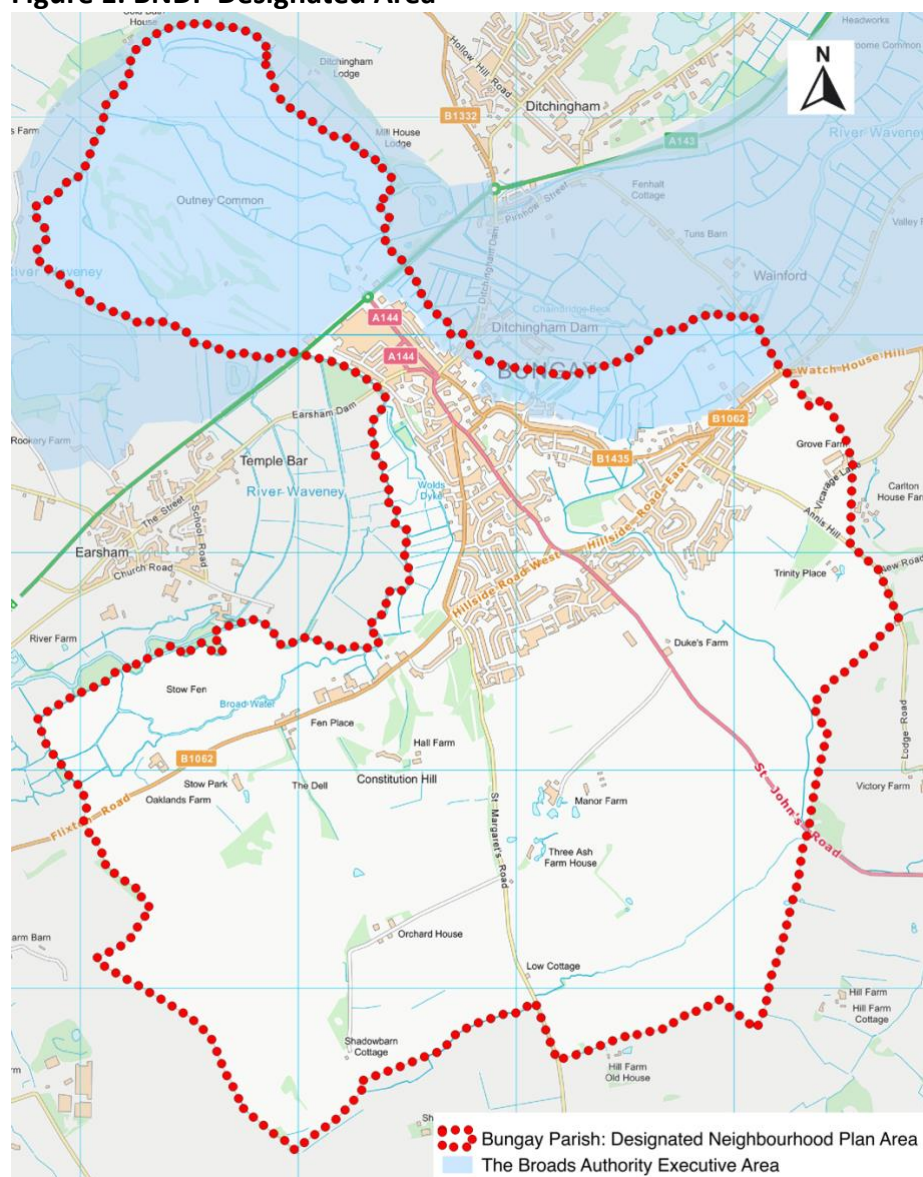
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Introduction

1. Collective Community Planning have been commissioned to undertake a Strategic Environmental Assessment (SEA) in support of the emerging Bungay Neighbourhood Development Plan (BNDP).
2. The BNDP is being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012, and in the context of the local plans of East Suffolk Council and the Broads Authority.
3. The Bungay Neighbourhood Plan area, shown in **Figure 1**, was designated in April 2016.

Figure 1: BNDP Designated Area



250 0 250 500 750 1000 m
Scale 1:20,000 at A4
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Policy Context

4. The BNDP sits within two local authority areas, East Suffolk and the Broads Authority. As a result, there are two adopted Local Plans which the Neighbourhood Plan will need to be in general conformity with. **Figure 1** highlights the extent of the Broads Authority Executive Area within the BNDP area.
5. On 1 April 2019, East Suffolk Council was created by parliamentary order, covering the former districts of Suffolk Coastal District Council and Waveney District Council. The Waveney Local Plan remains the current planning document for the Waveney part of the East Suffolk Council area until such time that it is replaced. The East Suffolk Council Waveney Local Plan, adopted in March 2019, covers the period 2014-36.
6. The Local Plan for the Broads, adopted May 2019, contains the policies and land allocation to help determine planning applications within the Broads Authority Executive Area.

The SEA Process

7. SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues. The aim is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts and maximising the potential for positive effects. Through this approach, the SEA for BNDP seeks to maximise the emerging plan's contribution to sustainable development.
8. SEA is undertaken to meet the specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).
9. BNDP has been screened in as requiring SEA. This is as a result of the plan proposing to allocate land for residential development with the potential to lead to a range of environmental effects. It has also been screened in for the requirement for Appropriate Assessment under the Habitats Regulations. Responses from the statutory consultees support the requirement for SEA.
10. This report, the scoping, seeks to establish a suggested scope for the SEA. A key procedural requirement of the SEA Regulations is to present this scope so that the designated environmental bodies can provide comment.

SEA Scoping

11. Developing the draft scope for the SEA has involved the following:
 - Exploring the policy context for the BNDP and SEA;
 - Establishing a baseline for the SEA (ie the current and future situation in the area in the absence of the BNDP) to identify the plan's likely significant effects;
 - Identifying particular issues or opportunities that should be a particular focus of the SEA;

- Considering this information to develop a SEA framework comprising SEA objectives and assessment questions, which can then be used as a framework for the subsequent assessment.

12. The scope is explored and presented under a series of key environmental themes which reflect the 'SEA topics' suggested by Annex I (f) of the SEA Directive. The themes include:

- Biodiversity
- Climate change
- Air quality
- Landscape
- Water resources, land and soil
- Historic environment
- Population and health
- Accessibility and transport

13. Scoping information for each theme is presented in the themed sections and the proposed SEA framework provided in **Appendix A**. Each proposal within the emerging BNDP will be objectively assessed using this framework.

Biodiversity

14. This theme focuses on designated wildlife sites, habitats and species within and surrounding the BNDP area.

Policy Context

15. **National Planning Policy Framework (2019)**¹: Emphasis is on conserving and enhancing the natural environment, minimising impacts on and providing net gains for biodiversity through development. Designated sites, important habitats and species are afforded significant protection – with plans expected to take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure.
16. **A Green Future: Our 25 Year Plan to Improve the (2018)**²: This sets out a vision to help the natural world regain and retain good health, aiming to deliver cleaner air and water, protect threatened species and provide richer wildlife habitats. Emphasis is on enhancing biodiversity rather than just protecting it.
17. **Environment Bill (2020)**³: The emerging Environment Bill is a significant piece of legislation that will provide further provisions for biodiversity when it achieves royal assent. It sets a mandatory net gain approach, with a minimum of 10% biodiversity net gain required for planning applications. It also sets out the establishment of local nature recovery strategies to support habitat recovery and identify local priorities. These could be used to help target net gain.
18. **Suffolk's Nature Strategy (2015)**⁴: This sets recommendations and priority actions in relation to nature conservation and enhancement, split by the natural environment, economic growth and health and wellbeing. These cut across protected sites, climate change, landscapes, habitats and species, green spaces, water management and education. Recommendation 10 relates to neighbourhood plans, identifying these as an opportunity to develop local of ecological networks.
19. **East Suffolk Council Waveney Local Plan (2019)**⁵: Policy WLP8.34 on Biodiversity and Geodiversity sets out that development should maintain, restore or enhance green infrastructure networks. Sites of local importance including County Wildlife Sites, priority habitat and species are afforded protection.
20. **Local Plan for the Broads (2019)**⁶: This requires development to protect the value and integrity of designated sites and demonstrate biodiversity gains, paying particular

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

³ <https://publications.parliament.uk/pa/bills/cbill/58-01/0220/200220.pdf>

⁴ <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/suffolks-countryside-and-wildlife/Suffolks-Nature-Strategy-2015.pdf>

⁵<https://www.eastsuffolk.gov.uk/assets/Your-Council/WDC-Council-Meetings/2019/March/Council-20-03-19/Item-11-APPENDIX-A-Waveney-Local-Plan.pdf>

⁶ https://www.broads-authority.gov.uk/_data/assets/pdf_file/0036/259596/Local-Plan-for-the-Broads.pdf

attention to ecological networks and habitat corridors. There is also emphasis on linking fragmented habitats of high wildlife value.

21. **Waveney Green Infrastructure Strategy (2015)**⁷: This sets a strategic approach to improve the green spaces and connections between them to the benefit of communities, wildlife and the wider environment. Key recommendations for Bungay include ensuring open spaces do not become isolated through new development and improving management of green spaces to encourage greater biodiversity value.

Current Baseline

22. There are no internationally or nationally designated wildlife sites within the BNDP area. The nearest Natura 2000⁸ sites are **The Broads Special Area of Conservation (SAC) and Broadland Special Protection Area (SPA)/Ramsar**, around 4.5km to the south east. The multiple designations indicate the high values associated with the site, in terms of supporting biodiversity.
23. The **Broadland SPA/Ramsar** comprises a low-lying wetland straddling the border between east Norfolk and northern Suffolk. It is a floodplain of five river systems including the Bure, Yare and Waveney and their major tributaries. The area represents one of the highest quality marshland complexes in the UK with a mosaic of wetland habitats, including open water, reedbeds, carr woodland, grazing marsh, tall herb fen, transition mire and fen meadow. In turn this wetland complex sustains an internationally important assemblage of breeding and non-breeding raptors and waterbirds. Both breeding and non-breeding bird features spend time on feeding areas outside the designated site boundary.
24. **The Broads SAC** is a 5,889ha site in East Anglia comprising humid grassland (39%), broad-leave deciduous woodland (24%, bogs and marshes (19%) and inland water bodies (16%). It constitutes a variety of sensitive habitats, most of which are dependent on a consistent hydrological input. The SAC contains oligo-mesotrophic waters with Chara species. These waters are characterised by very clear water and a low nutrient content. They are also base-rich (generally calcium) and are usually confined to underlying areas of limestone. The Broads are the richest site for charophytes in Britain with a total of 20 recorded species. The Broads SAC also supports the largest occurrence of calcareous fens outside of Sweden.
25. There are a number of **nationally designated** Sites of Special Scientific Interest within close proximity of the BNDP area. This includes Abbey Wood, Flixton; Sexton Wood; Tindall Wood, Ditchingham; and Broome Pit Heath, each of which are around 2km from the area. See **Figures 2 and 3**.
26. Nationally designated **Abbey Wood, Flixton SSSI** is an 18ha site south-west of Bungay. It consists of two adjoining areas, the larger Abbey Wood to the north and the smaller

⁷<https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Green-Infrastructure-Strategy.pdf>

⁸ Natura 2000 or N2K sites include Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites.

Packway Wood to the south. This ancient woodland is managed as coppice with standards. Common trees include hazel, hornbeam and oak. The flora are diverse with dog's mercury dominant, and there is one rare species, thin-spiked wood sedge. The site is on private land with no public access. Around half of the site is in a 'favourable' or 'unfavourable – recovering' condition, the remaining 'unfavourable – no change' condition⁹.

27. **Sexton Wood SSSI** is a 40-hectare (99-acre) biological Site of Special Scientific Interest north-west of Ditchingham in Norfolk. It is a Nature Conservation Review site, Grade 2. This ancient wood on boulder clay is mainly coppice with standards, but there are some areas of high forest. The ground flora is diverse, with dog's mercury dominant and other plants such as ransoms and early-purple orchid. The wood is private property with no public access. The whole area is in an 'unfavourable – recovering' condition¹⁰.
28. The 41ha **Tindall Wood SSSI** is one of the largest hornbeam woods in the county and is considered representative of the type. It is an ancient woodland situated on poorly drained south Norfolk boulder clay which is overlain in places by sandy loam. Surrounded by a massive woodbank and ditch, the wood mainly supports Hornbeam and Oak with Ash, Maple and Hazel. Several uncommon species are found in the ground flora which indicate that the woodland may be primary. The whole area is in an 'unfavourable – recovering' condition¹¹.
29. **Broome Heath Pit SSSI** contains the only remaining exposures in the Broome Terrace. This 5.63ha site is an old river terrace which has a surface about 3m above the flood plain of the modern River Waveney. The pit exposes silt lenses within a sand and gravel sequence indicating a depositional environment of a braided river channel with a backwater areas. Other features within the section include perecontemporaneous ice wedge casts and cryoturbation, indicating subglacial depositional conditions. The site is in an 'unfavourable – no change' condition¹².
30. **Bungay Common County Wildlife Site**, also known as Outney Common, is a formal but non-statutory designated site that extends over 160ha. It is naturally divided into the Lows, which forms about half of the area and comprises low lying grazing land bordering the River Waveney. The Hards make up the remaining half and are higher ground in the centre which contains an 18 hold Golf Course.
31. **Impact Risk Zones** (IRZs) have been identified in the areas surrounding the designated SSSIs. There are seven IRZs that cover the entire BNDP area. Their review in accordance with Natural England guidance¹³ indicates that residential development is not an identified trigger for impacts which requires further consultation with Natural England.

⁹ Natural England (2021) Designated Sites Viewer (online) available at:
<https://designatedsites.naturalengland.org.uk/SiteSearch.aspx>

¹⁰ Ibid

¹¹ Ibid

¹² Ibid

¹³ Natural England (2020) Natural England's Impact Risk Zones for Sites of Special Scientific Interest -
https://magic.defra.gov.uk/Metadata_for_magic/SSSI%20IRZ%20User%20Guidance%20MAGIC.pdf

This indicates that residential development which may come forward as part of BNDP is unlikely to pose a risk to the SSSIs.

32. Directly adjacent the BNDP area to the north lies **Bath Hills Local Nature Reserve (LNR)**. The 12ha site is on the sheltered south side of a steep valley. It has an abundance of spring flowers which bloom early as a result of its position.
33. The Waveney River Valley provides a range of **Priority Habitats** that support biodiversity around the northern fringes of the town. This includes:
 - Deciduous woodland;
 - Coastal and floodplain grazing marsh; and
 - Good quality semi-improved grassland.
34. Public access to these areas is limited and ecological connectivity is good. More fragmented deciduous woodland also exists to the south-west of the town. Within the built-up area there are limited areas of priority habitat or green space more generally, and connectivity between them is poor.
35. An area along the north-eastern border of the BNDP area contains areas identified as part of a **Habitat Network Expansion / Enhancement Zone** and also an area classified as **Restorable Habitat**. This is land within close proximity to the existing habitat components that are likely to be suitable for habitat re-creation, or where other types of habitat may be created¹⁴.

Future Baseline

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

Key Issues

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

¹⁴ Natural England, 2020, Natural Habitat Network Maps https://s3-eu-west-1.amazonaws.com/data.defra.gov.uk/Natural_England/Habitat_Species/Habitats/Habitat_Network_England_NE/Habitat_Networks_England_Version_2_Guidance.pdf

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

SEA Objective

41. It is proposed that the SEA should include the following objective and assessment questions in relation to biodiversity.

Objective: To maintain and enhance the extent, quality and connectivity of biodiversity sites and ecological networks within and surrounding the BNDP area.

Assessment Questions (will the option or proposal help to):

- Support protection and enhancement of designated sites?
- Deliver more or enhanced open green spaces which may reduce recreational pressure on designated sites?
- Create opportunity for improved connectivity between green spaces in the built-up area of Bungay?
- Ensure existing open green spaces do not become isolated.
- Protect and enhance areas of priority habitat and ecological connectivity between them?
- Support habitat improvement in line with emerging national requirements for biodiversity net gain?

Figure 2: Biodiversity Designations in the BNDP area

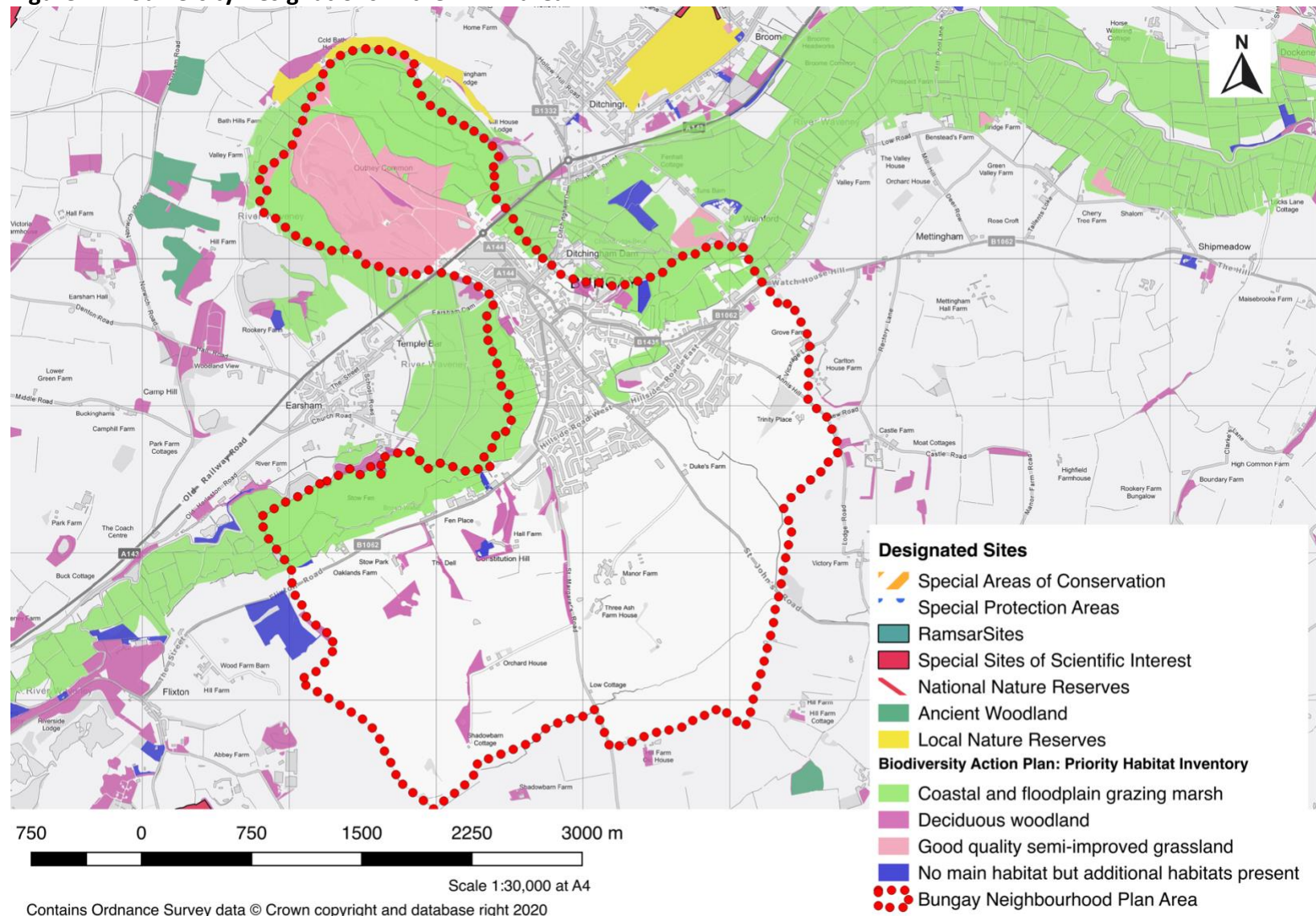
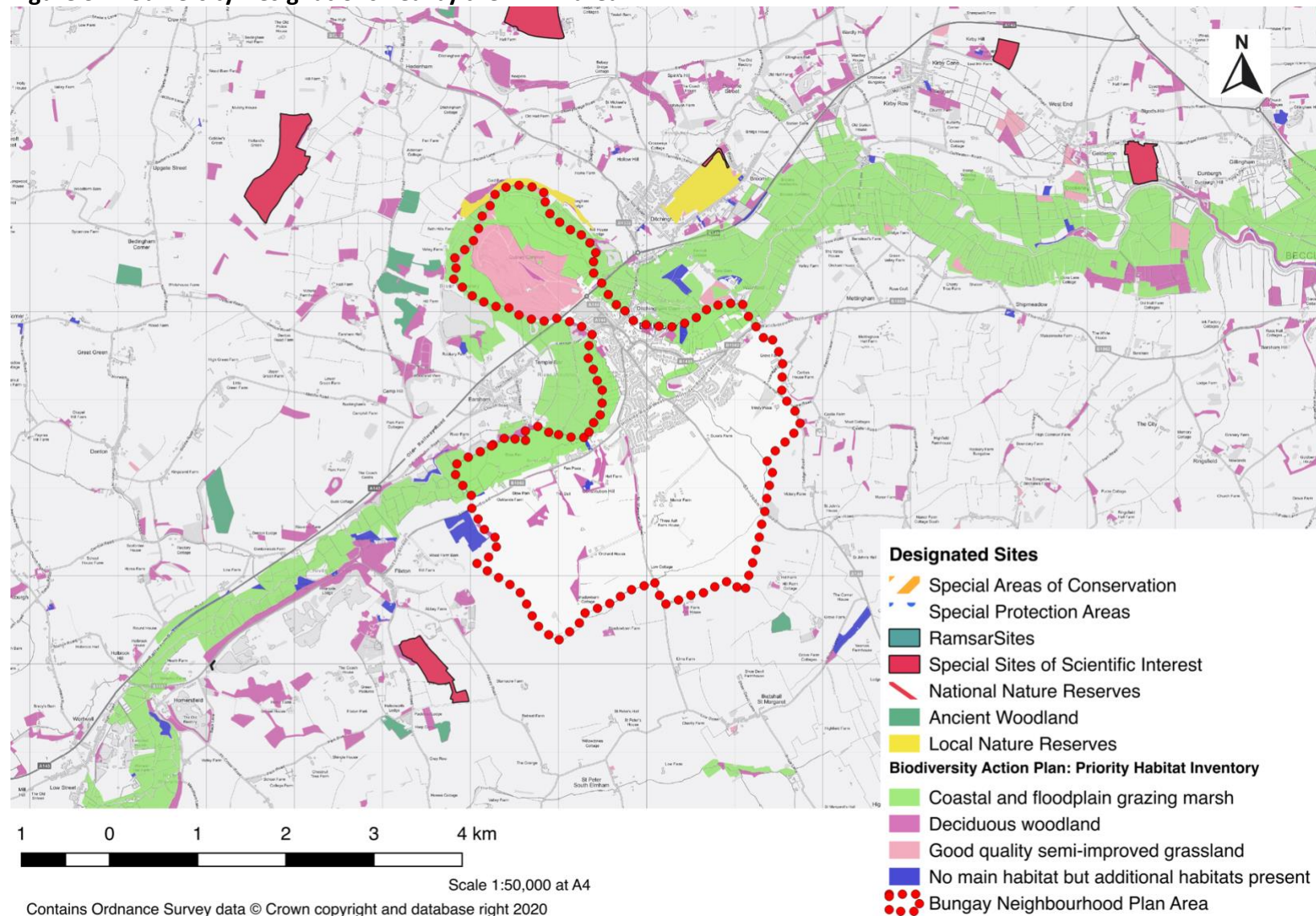


Figure 3: Biodiversity Designations nearby the BNDP area



Climate Change

This theme focuses on climate change mitigation and adaptation.

Policy Context

42. **National Planning Policy Framework (2019)**¹⁵: This requires proactive planning to mitigate and adapt to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts. Inappropriate development in areas of high risk from flooding should be avoided.
43. **Neighbourhood Planning in a Climate Emergency (2020)**¹⁶: This is a guide for developing a neighbourhood plan which focuses on dealing with climate change and its implications. It is structured across the key themes of renewable energy; sustainable buildings; sustainable transport; flooding, extreme weather and water conservation; green infrastructure and biodiversity; transitioning to a low carbon economy and service provision.
44. **UK Climate Change Act (2008)**¹⁷: This establishes a framework to develop an economically credible emissions reduction path and contribute towards action to tackle climate change under the Kyoto Protocol and UN-led Paris Agreement.
45. **The Clean Air Strategy (2019)**¹⁸: This sets out government plans for dealing with all sources of air pollution. It complements the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan.
46. **Decarbonising Transport: Setting the Challenge (2020)**¹⁹: This sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting the UK on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050.
47. **Suffolk Climate Emergency Plan (2020)**²⁰: This sets out an ambition to achieve carbon neutrality by 2030. Actions are required across a range of sectors including housing, transport, energy and business.

¹⁵https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

¹⁶<https://neighbourhoodplanning.org/toolkits-and-guidance/how-to-write-a-neighbourhood-plan-in-a-climate-emergency/>

¹⁷<https://www.legislation.gov.uk/ukpga/2008/27/contents>

¹⁸<https://www.gov.uk/government/publications/clean-air-strategy-2019>

¹⁹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf

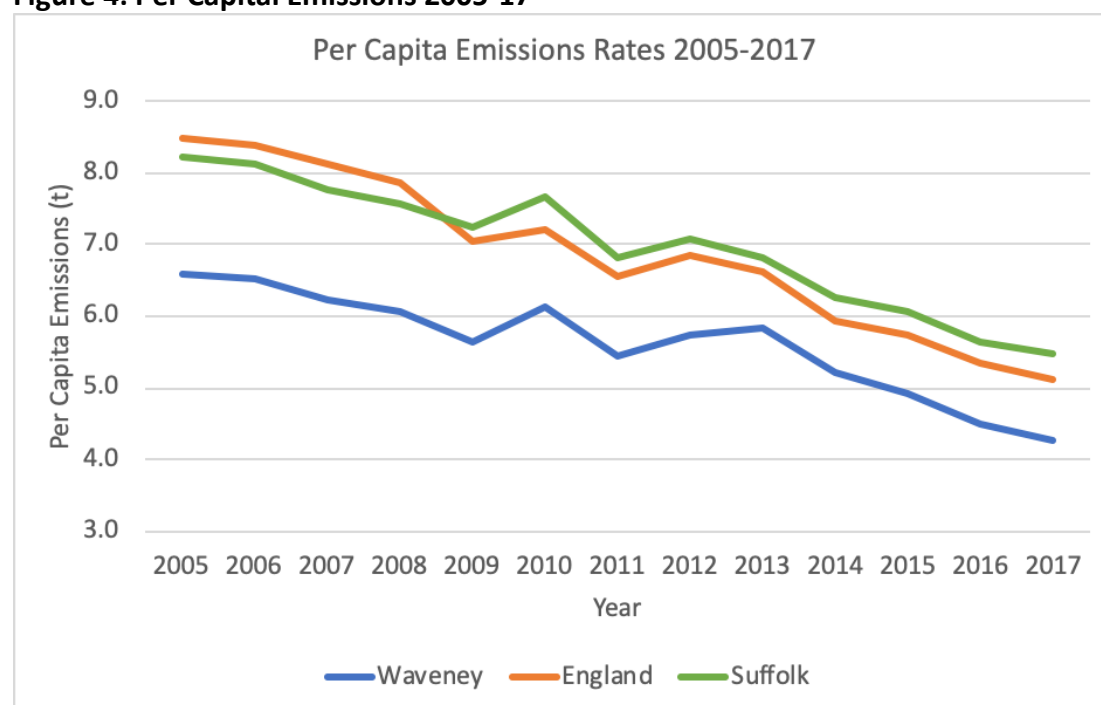
²⁰<http://www.greensuffolk.org/assets/Greenest-County/SCCP/SCCP/Misc/2020-06-01-REE-SCEP-Technical-Report-FINAL.pdf>

48. **East Suffolk Council Waveney Local Plan (2019)**²¹: This contains a range of policies relating to climate change including in relation to flood risk, coastal change, renewal and low carbon energy and sustainable construction.
49. **Local Plan for the Broads (2019)**²²: This welcomes positive action from development which enable a move towards a low carbon economy and society and helps biodiversity adapt to climate change. Efforts to mitigate, adapt and increase resilience to climate change are required. The plan also includes a climate-smart planning cycle and climate-smart checklist for developers.

Baseline

50. In 2019 Suffolk County Council declared a climate emergency, committing to achieve carbon neutrality by 2030. The Suffolk Climate Emergency Plan makes a commitment for all Suffolk councils to reduce their own carbon emissions and work together to reduce carbon emissions.
51. UK local authority carbon dioxide emissions estimates for 2017 (published June 2019) presents the latest estimates of end-user carbon dioxide (CO₂) emissions for local authority areas²³. Between 2016 and 2017, CO₂ emissions decreased across the UK and in East Suffolk/Waveney. **Figure 4** illustrates the declining trend in per capita emission rates over the twelve-year period from 2005 to 2017. Rates in Waveney are lower than the averages across Suffolk and England.

Figure 4: Per Capital Emissions 2005-17



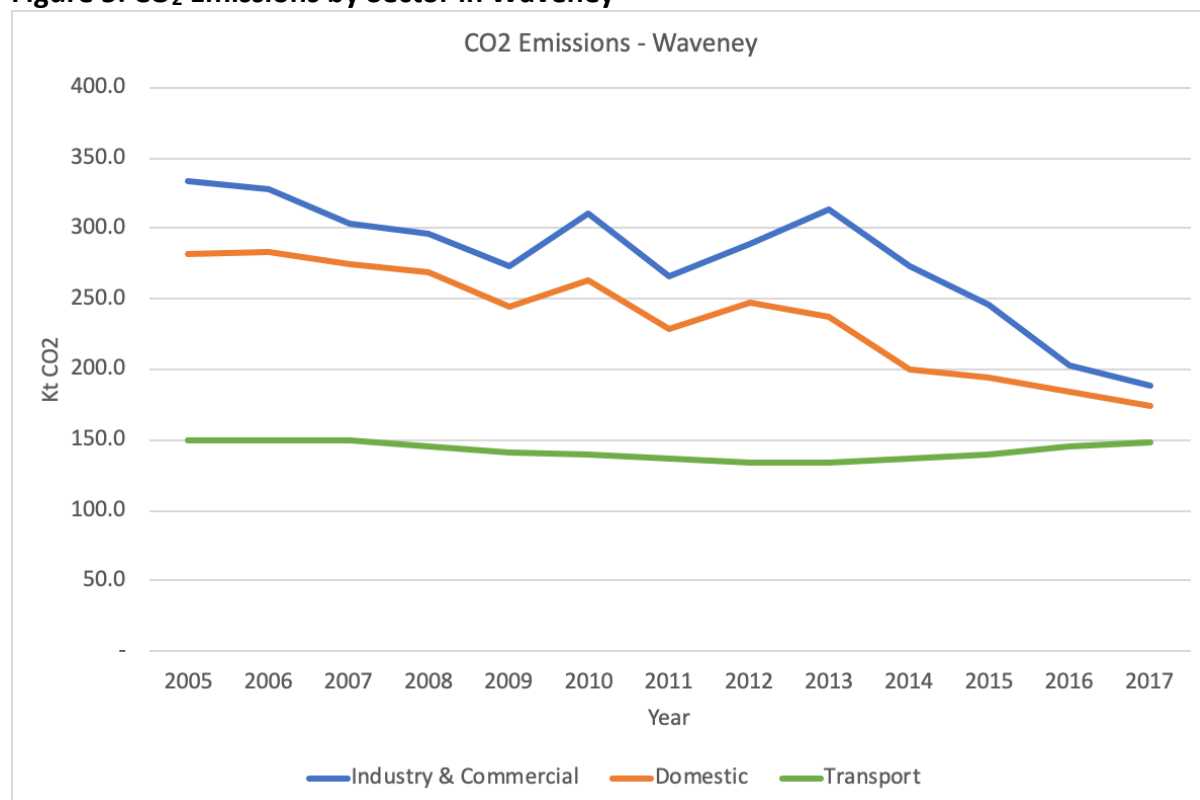
²¹ <https://www.eastsuffolk.gov.uk/assets/Your-Council/WDC-Council-Meetings/2019/March/Council-20-03-19/Item-11-APPENDIX-A-Waveney-Local-Plan.pdf>

²² https://www.broads-authority.gov.uk/_data/assets/pdf_file/0036/259596/Local-Plan-for-the-Broads.pdf

²³ <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2017>

52. Overall in Waveney in 2017, 37% of end-user CO₂ emissions were attributed to the industrial and commercial sector, 34% to the domestic sector, and 29% to transport. Whilst industrial/commercial and domestic emissions have shown a declining trend since 2005 (see **Figure 5**), transport emissions have remained largely static at around 150kt CO₂. In the domestic sector, historically emissions from electricity aligned with those from gas, but there has been marked decrease in emissions from electricity, with these now 50% lower. In relation to industry and commercial, emissions significantly decreased between 2014 and 2016 in relation to electricity.

Figure 5: CO₂ Emissions by Sector in Waveney



53. In relation to transport emissions, expectation is that all vehicles will be ultra-low emission by 2030. Enabling infrastructure, including electric vehicle charging points, is important in achieving this. At 4 January 2021 there were 44 public **electric vehicle** charging devices available in East Suffolk. Of these 10 were rapid charging devices. This equates to 18 devices per 100,000 population²⁴. This is a slight reduction in availability on 2020 levels. Charging devices have largely been funded by private sector investment. Grant funding is available for private domestic charging and workplace charging devices, however these types of devices are not included within the government statistics as they are not available to the general public.
54. In relation to domestic emissions, in July 2020 the new Green Homes Grant scheme was announced, which is intended to support homeowners in England in making their **homes more energy efficient**, and create new work in the construction industry. Energy Performance Certificate (EPC) data show new dwellings are more energy efficient than

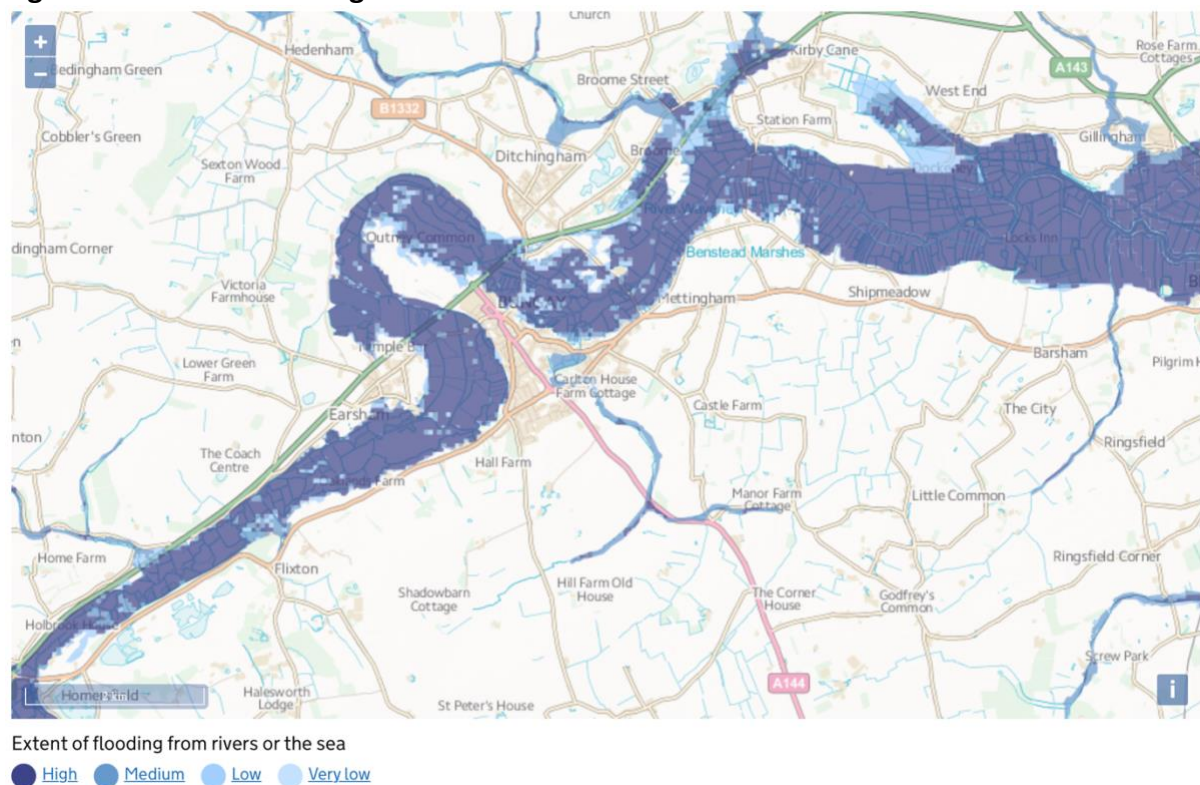
²⁴ <http://maps.dft.gov.uk/ev-charging-map/>

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

55. Increasing the supply of **renewable energy** allows carbon intensive energy sources to be replaced and reduce CO₂ emissions. Data from the Department for Business, Energy and Industrial Strategy²⁵ indicates that East Suffolk has 6,529 sources of renewable energy, generating 1,202MW of electricity (2019 data). This is primarily from offshore wind (3 sites) and photovoltaics (96 sites). East Suffolk has one of the highest levels of renewable electricity generated among all local authority areas.

56. In relation to climate change adaptation, **fluvial flood risk** in the BNDP area follows the River Waveney and its tributaries, as shown in **Figure 6**. Areas surrounding the low-lying reach of the river are fairly flat, so the river will spread into an extensive flood plain during times of high flow when the river overtops its banks. This floodplain area subsequently drains slowly due to low gradients, and it may be boggy and marshy.

Figure 6: Extent of flooding from Rivers or the Sea



57. The functional floodplain, areas within an annual probability of flooding of 5%, has been mapped as part of development of the Waveney/East Suffolk Local Plan²⁶. To the north of the town the functional floodplain encroaches on residential areas towards Trinity

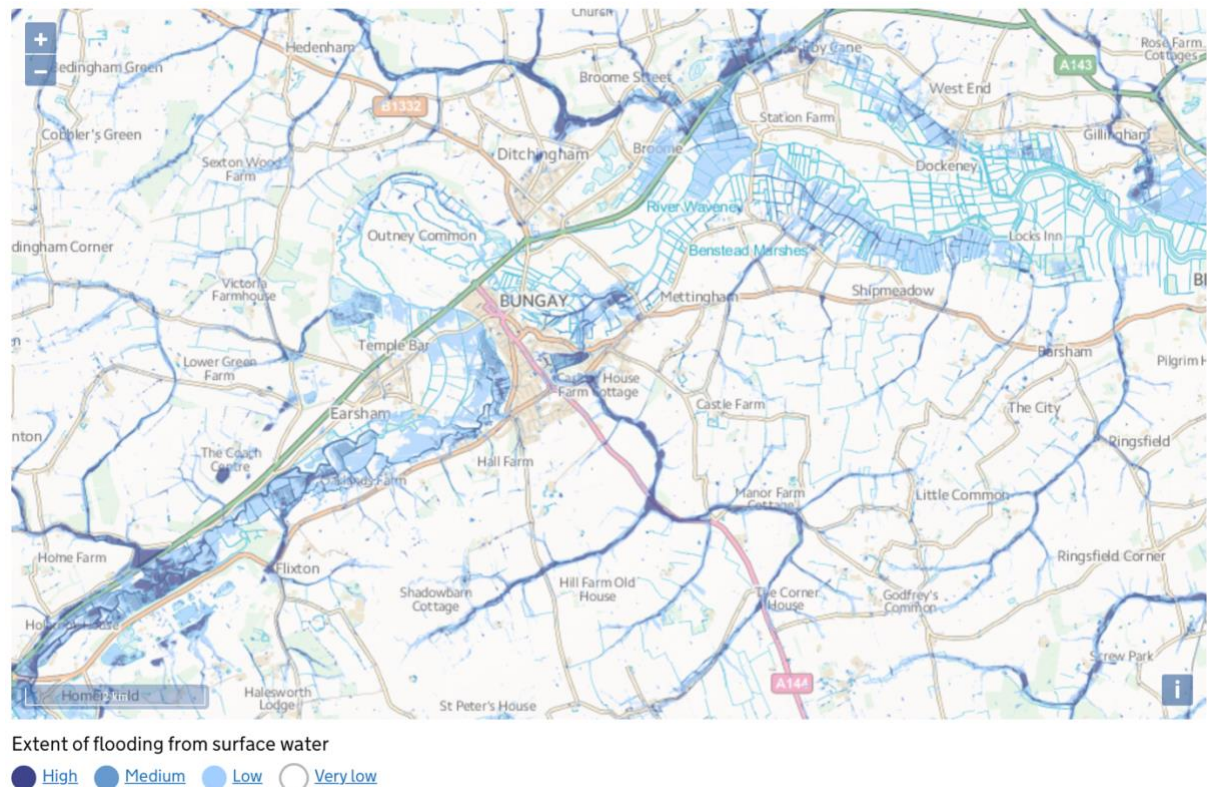
²⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/920654/Regional_Renewables_2019.pdf

²⁶ <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Strategic-Flood-Risk-Assessment/06-PPS25-Flood-Zones-Barnby-and-North-Cove-Beccles-Blundeston-Bungay.pdf>

Street and Beccles Road. To the south it extends towards residential properties to the south-west of Castle Land and Boyscott Lane.

58. **Surface water flood risk** follows a similar pattern, though extends over a part of the built-up area. See **Figure 7**. In December 2020 Bungay as part of the Waveney River Catchment area experienced unprecedented surface water flooding. This included to properties not within identified flood zones and further investigation into this is ongoing.

Figure 7: Extent of Flooding from Surface Water



Future Baseline

59. Per capita CO₂ emissions are likely to continue to decrease as energy efficiency measures, renewable energy production and new technologies become more widely adopted. The most recent data indicates a slight increase in per capita transport emissions but this is likely to reduce through the ongoing adoption of energy efficient / electric vehicles. The availability of infrastructure to facilitate this, such as electric vehicle charging points, is expected to increase in the future. Transport emissions will also likely reduce due to changing work patterns and more people working remotely/at home.
60. Climate change has the potential to increase the number and severity of extreme weather events. Given the functional floodplain extends into the built-up area, residents and their property may be more at risk from flooding.

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

Key Issues

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

SEA Objective

65. It is proposed that the SEA should include the following objective and assessment questions in relation to climate change.

Objective 1: Support the resilience of the BNDP area to the potential effects of climate change.

Assessment Questions (will the option or proposal help to):

- Ensure development is directed away from areas at risk of flooding?
- Increase the resilience of the local built or natural environment?
- Improve or extend green infrastructure networks?
- Promote Sustainable Drainage Systems?

Objective 2: Reduce carbon dioxide emissions within the BNDP area.

Assessment Questions (will the option or proposal help to):

- Promote sustainable modes of travel?
- Reduce the need to travel by car?
- Provide infrastructure to support the uptake of low emission vehicles?
- Promote renewable energy sources?
- Increase the level of low carbon or energy efficient homes?

Air Quality

This theme focuses on air pollution, in particular areas known to exceed objectives for air quality.

Policy Context

66. **National Planning Policy Framework (2019)**²⁷: This requires compliance with relevant limit values or national objectives for pollutants, considering the presence of Air Quality Management Areas and Clean Air Zones. Additionally, opportunities to improve air quality or mitigate impacts are promoted through delivery of sustainable development, travel management and green infrastructure provision.
67. **Clean Air Strategy (2019)**²⁸: This sets a framework for action to tackle air pollution, making our air healthier to breathe, protecting nature and boosting the economy. It includes a shift away from just tackling the biggest individual sources of air pollution to addressing smaller and more diffuse sources.
68. **UK Plan for tackling roadside nitrogen dioxide concentrations (2017)**²⁹ This outlines a £2.7bn investment in air quality and cleaner transport, including investment in ultra-low emission vehicles, cleaner bus technology, walking and cycling infrastructure and improving air quality on trunk roads.
69. **East Suffolk Council Air Quality Annual Status Report (2020)**³⁰ This sets out key measures undertaken to improve air quality across the district, and in particular in the two Air Quality Management Areas declared for exceeding nitrogen dioxide targets in the past. Neither of these are in or nearby to the BNDP area and recent monitoring results (for 2019) show no exceedances across the district.
70. **East Suffolk Council Waveney Local Plan (2019)**³¹: Some specific air quality issues are identified in relation to site allocations, though not those which fall within the BNDP area.
71. **Local Plan for the Broads (2019)**³²: Clean air is identified as a natural ecosystem service alongside water regulation, carbon storage and flood regulation. Requirement to consider air pollution, particularly with respect to traffic impacts, is made in several of the allocation policies, none of which are within the BNDP area.

²⁷https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

²⁸<https://www.gov.uk/government/publications/clean-air-strategy-2019>

²⁹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-plan-overview.pdf

³⁰<https://www.eastsuffolk.gov.uk/assets/Environment/Environmental-Protection/Air-Quality/East-Suffolk-Council-ASR-2020.pdf>

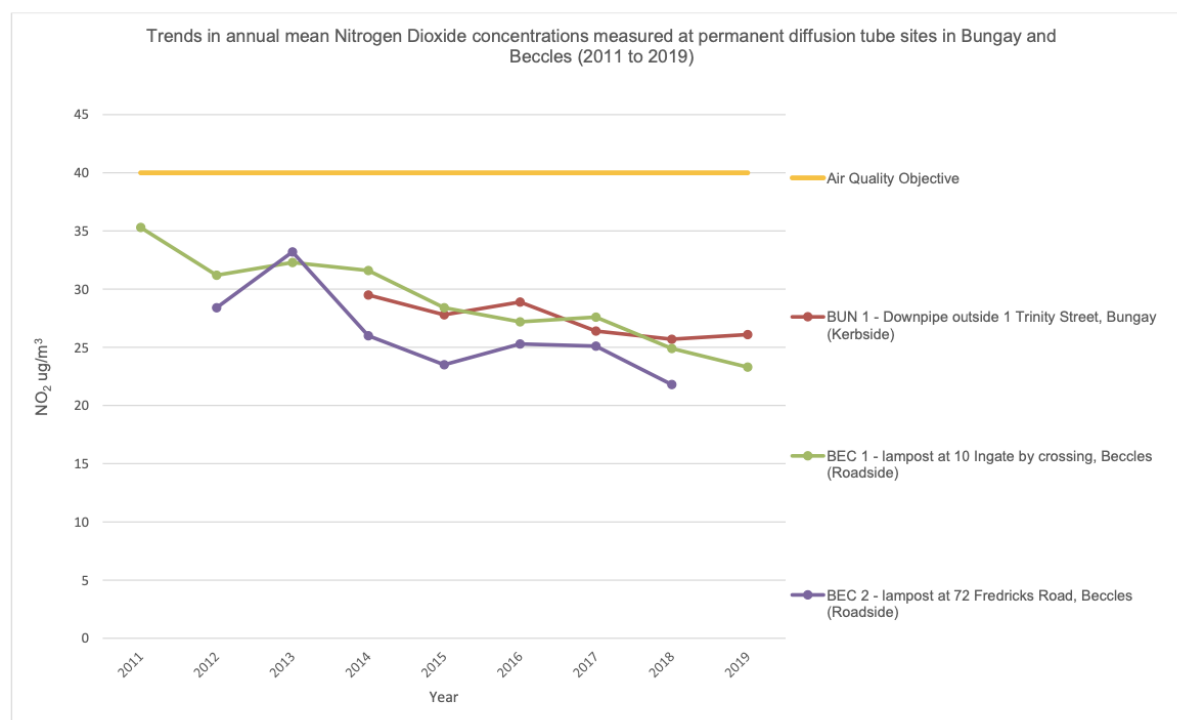
³¹<https://www.eastsuffolk.gov.uk/assets/Your-Council/WDC-Council-Meetings/2019/March/Council-20-03-19/Item-11-APPENDIX-A-Waveney-Local-Plan.pdf>

³²https://www.broads-authority.gov.uk/_data/assets/pdf_file/0036/259596/Local-Plan-for-the-Broads.pdf

Baseline

72. The East Suffolk Council Air Quality Annual Status Report confirms that there are no Air Quality Management Areas in or nearby to the BNDP area. This would suggest that air quality is generally not of a concern, and indeed the report confirms that air quality within East Suffolk is good.
73. The main source of emissions within East Suffolk is road traffic, which means that the pollutants of concern are nitrogen dioxide (NO₂) and particulate matter. There are 74 diffusion tube monitoring locations covering 18 areas across the district, including Bungay. No exceedances in NO₂ were observed in 2019 and data indicates that NO₂ concentrations have remained static in Bungay over the last 3 years, see **Figure 8**.
74. Transport emissions are the main source of NO₂ emissions and areas of congestion can give rise to concentrations of emissions. Congestion is of most concern locally within the medieval town centre, particularly in close proximity to the schools. HGVs and traffic congestion at pick up and drop off times could exacerbate air quality issues.

Figure 8: Trends in annual NO₂ concentrations



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

Future Baseline

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

Key Issues

76. Air quality is generally good within the BNDP area as it is across East Suffolk as a whole. Annual monitoring demonstrates that levels of NO₂, the main pollutant of concern, are well below the national objective. Vehicle emissions are a key cause of NO₂, and therefore in areas of congestion often have higher levels of pollutants. As the A144 runs through Bungay town centre, road traffic congestion is of period concern. New growth in the vicinity of this has the potential to increase traffic and result in poorer air quality. Some of these issues are explored in the accessibility and transport and population and health themes.
- 77. In the absence of any specific air quality issues (AQMA's or areas known to exceed national objectives for air quality) the air quality theme has been scoped out for the purposes of this SEA.**

Landscape

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

Policy Context

79. **National Planning Policy Framework (2019)**³³: Great weight is given to protecting and enhancing valued landscapes, particularly the landscape and scenic beauty of National Parks, the Broads and Areas of Outstanding Natural Beauty. These have the highest status of protection., with the scale and extent of development within these areas limited. All development should be sympathetic to its landscape setting.

80. **A Green Future: Our 25 Year Plan to Improve the (2018)**³⁴: This focuses on leaving the environment in a better condition for future generations, including through enhancing the beauty of landscapes. There is emphasis is on landscape-scale change and restoration as a way to recover nature. Landscape designations, including national parks, are important and opportunities should be taken to monitor and improve their quality for people, places and nature.

81. **East Suffolk Council Waveney Local Plan (2019)**³⁵: This recognises the importance of landscape character areas, requiring that development should be informed by and sympathetic to the strategic objectives and considerations identified in the districts Landscape Character Assessment (2008). Particular mention is given to development within the setting of the Broads, with measures taken to avoid and mitigate any impacts on this important landscape.

82. **Local Plan for the Broads (2019)**³⁶: This requires development proposals to conserve and enhance the key landscape characteristics of the Broads, with particular attention paid to defining and distinctive qualities of the varied landscape. Furthermore, restoration of landscapes will be sought where either natural or cultural heritage features of importance have been lost or degraded.

Baseline

83. Part of the BNDP area falls within **the Broads**, which has equivalent status of a national park, see **Figure 11** at the end of this section. This is recognised as a landscape of exceptional beauty and uniqueness. The 1949 Act defines the National Park purposes as being to conserve and enhance natural beauty, wildlife and cultural heritage and to promote opportunities for the understanding and enjoyment of the special qualities by the public. The Broads shares these two purposes but also has the third purpose of protecting the interests of navigation, promoting open-air recreation. The vision for the

³³https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

³⁴https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

³⁵<https://www.eastsuffolk.gov.uk/assets/Your-Council/WDC-Council-Meetings/2019/March/Council-20-03-19/Item-11-APPENDIX-A-Waveney-Local-Plan.pdf>

³⁶https://www.broads-authority.gov.uk/_data/assets/pdf_file/0036/259596/Local-Plan-for-the-Broads.pdf

English National Parks and the Broads relates to them being thriving, living, working landscapes, where sustainable development can be seen in action, wildlife flourishes and habitats are maintained, restored and expanded, and where everyone can discover the rich variety of England's natural and historic environment³⁷. These special qualities are protected under legislation and through planning policy.

84. The National Character Area profile for **the Broads**³⁸ sets out that the whole area is known for the shallow lakes, referred to as 'broads' that are contained within the river valleys. These broads are the effect of medieval excavations of peat that became flooded as sea levels rose. The agricultural landscape is based on a long history of drainage to allow livestock grazing interspersed with arable cropping, which is supported by moderately fertile river valley and flood plain soils. The low-lying marshes are traditionally unsettled, instilling a rather isolated character, while the pattern of settlement on the higher ground is clustered and linked by a minor road network that runs along the valley sides. A loose vernacular of flint, pebble and brick, with pantiles and occasionally reed thatch, adds cohesion to settlements.

85. Key characteristics include:

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

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

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

³⁷ Defra, English National Parks and the Broads, UK Government Vision and Circular, 2010

³⁸ <http://publications.naturalengland.org.uk/file/5565204962213888>

- Provide high quality green infrastructure networks;
87. Bungay is identified as one of the main settlements within The Broads. With respect to recent changes in the landscape, it is noted that development pressure has generally been low over the last decade, but there have been some locally significant developments, including in Bungay.
88. The remainder of the BNDP area falls within the **South Norfolk and High Suffolk Claylands National Character Area**³⁹. The high and predominantly flat clay plateau dominates the character of the landscape, which is incised by numerous small-scale wooded river valleys.
89. The landscape has both confined areas with intimate views and more open views with a sense of exposure. The underlying geology is chalk, which forms a principle aquifer, and the rivers are mostly small and slow flowing which contributes to the character of the landscape. The Waveney is the largest river in this area and forms a physical division between the counties of Norfolk and Suffolk. The river valleys contain an important mosaic of small-scale pasture, wet heath, reedbeds and woodland that provide ecological connectivity into the heart of the claylands.
90. Key characteristics include:
- Scattered areas of ancient woodland, game copses, shelterbelts, valley floor plantation and carr woodland as well as hedgerow trees provide a treed landscape character;
 - Extensive areas of arable farming with a strong utilitarian and rural character demonstrated through ancient irregular field patterns.
 - A dispersed settlement pattern of small nucleated market towns with architectural variety and colour, loosely clustered villages and scattered hamlets;
 - Large, often interconnected village greens or commons are a key feature, along with long distance footpaths, country estates and parklands.
91. The ecosystem services provided by the landscape, and which should be protected include; provisioning services (food, fibre and water supply); regulating services (water purification, air quality maintenance and climate regulation); and cultural services (inspiration, education and wellbeing). Identified opportunities of particular relevance to the BNDP area include:
- Maintain and enhancing the rural character of the landscape and the contrast between the arable plateau and pastoral river valleys;
 - Measures that conserve and enhance the characteristic historic settlement patterns and historic features;
 - Maintain and enhance the river valleys and their grazed flood plains;
 - Protect and enhance the area's ancient semi-natural woodlands, copses, river valley plantations and ancient boundaries including hedgerows and hedgerow trees;
 - Improve opportunities for people to access, enjoy and understand rural and historic landscape assets, including recreational and tranquil areas.

³⁹ <http://publications.naturalengland.org.uk/file/5427224945623040>

92. At a more local level, the **Suffolk Landscape Character Assessment** characterises the BNDP area with four landscape character types. The key characteristics of each of these is identified in **Figure 9**.

Figure 9: Suffolk Landscape Character Types in BNDP area

Suffolk landscape Character Type	Key Characteristics
Wooded valley meadowlands and fen	<ul style="list-style-type: none"> • Flat valley bottom • Extensive peat deposits • Cattle grazed pasture • Network of drainage ditches • Areas of unenclosed wild fenland • Widespread plantation and carr woodland • Important sites for nature conservation • Localised settlement on the valley floor islands • Sense of quiet and rural isolation in many places
Rolling valley claylands	<ul style="list-style-type: none"> • Gently sloping valleys on medium clay soils • Occasional notable steeper slopes • Fields often smaller than on surrounding plateau • Localised influence of landscape parks • Focus of settlement • Few large greens or commons • Ancient woodland on the upper fringes of the valley sides
Rolling valley farmlands and furze	<ul style="list-style-type: none"> • Valleys with prominent river terraces of sandy soil • Small areas of gorse heathland in a clayland setting • Straight boundaries associated with late enclosure • Co-axial field systems • Mixed hedgerow of hawthorn, dogwood and blackthorn with oak, ash and field maple • Fragmentary cover of woodland • Sand and gravel extraction • Golf courses • Focus for larger settlements
Ancient plateau claylands	<ul style="list-style-type: none"> • Flat or gently rolling arable landscape of clay soils dissected by small river valleys • Field pattern of ancient enclosure – random patterns in the south but often co-axial in the north. Small patches of straight-edged fields associated with the late enclosure of woods and greens • Dispersed settlement pattern of loosely clustered villages, hamlets, and isolated farmsteads of medieval origin • Villages often associated with medieval greens or tyes • Farmstead buildings are predominantly timber-framed, the houses colour-washed and the barns blackened with tar. Roofs

	<p>are frequently tiled, though thatched houses can be locally significant</p> <ul style="list-style-type: none"> • Scattered ancient woodland parcels containing a mix of oak, lime, cherry, hazel, hornbeam, ash and holly • Hedges of hawthorn and elm with oak, ash and field maple as hedgerow trees • Substantial open areas created for WWII airfields and by 20th century agricultural changes • Network of winding lanes and paths often associated with hedges create visual intimacy
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93. The **Broads Landscape Character Assessment (2016)**⁴⁰ characterises the BNDP area with two character types, Waveney-Outney Common and Bath Hills Area and Waveney – East of A143 Bungay/Ditchingham to Shipmeadow/Geldeston. **Figure 10** provides an overview of key landscape characteristics in relation to these.

Figure 10: The Broads Landscape Character Types in the BNDP Area

Broads Landscape Character Type	Key Characteristics
Waveney – Outney Common and Bath Hills Area	<ul style="list-style-type: none"> • The 400acres Outney Common contains a large deposit of sands and gravel and ground cover has heathland attributes of acid grassland, gorse, bramble, stunted oaks, pines and birch which is relatively unusual in the Broads area. • Area forms part of the upper Waveney valley floodplain • Much of the area is surrounded by wooded undeveloped skylines, except where the Common meets with the A143 interface with Bungay; • A sense of movement and reflectivity is created by the River Waveney which follows a meandering course through the valley floor and creates a broad loop around the slightly elevated Common land; • Care needs to be taken when landscape change occurs
Waveney – East of A143 Bungay/Ditchingham to Shipmeadow/Geldeston	<ul style="list-style-type: none"> • A calm, tranquil, isolated pastoral landscape • The marshland is predominantly grass which is used for grazing during the summer months and is prone to flooding; • There are pockets of arable land and relatively little tree cover; • The landscape is only lightly settled, with small hamlets associated with the minor rural road network;

⁴⁰ <https://www.broads-authority.gov.uk/planning/planning-policies/landscape-character-assessments>

	<ul style="list-style-type: none"> • Settlement pattern is largely one of valley edge farmsteads arranged in a linear pattern between the town of Bungay and Geldeston; • Localised areas of intrusion exist on the eastern edge of Bungay and the A143; • Characterised as settlement fringe, the settlement extends into the floodplain;
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94. The Bungay Conservation Area Character Appraisal⁴¹ sets out that the towns location, on a low ridge above and looking across water meadows, affords it some stunning views out into the open countryside.

95. Despite its surroundings, limited **green space** exists within the settlement of Bungay itself. **Figure 12** provides an overview of green spaces within the town. There are no parks or gardens, and the Open Space Needs Assessment (2015)⁴² identifies that levels of park provision do not meet the expectations of the local community. Bungay also has one of the lowest levels of open space – just 3.63ha. The report goes on to suggest that access to Outney Common in Bungay offsets the shortfall in park provision, though creating at least one open space that meets the standards expected of a park should be considered.

96. The Waveney Green Infrastructure Strategy (2015)⁴³ identifies that access to natural and semi-natural green space in the Bungay area meets some Natural England recommended standards, but improved access would benefit the community. Key findings in the Bungay area include:

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

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

Future Baseline

98. The highest level of protection will continue to be afforded by national and local plan policy to the part of the BNDP area which falls within the Broads, which has equivalent

⁴¹ East Suffolk Council (2007) Bungay Conservation Area Character Appraisal [online] available at <https://www.eastsuffolk.gov.uk/assets/Planning/Design-and-Conservation/Conservation-Area-Appraisals/Bungay-Conservation-Area-Character-Appraisal.pdf>

⁴² <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Open-Space-Needs-Assessment.pdf>

⁴³ <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Green-Infrastructure-Strategy.pdf>

status of a national park. Future development may provide opportunities to improve the landscape buffer between the town / industrial area of Bungay and the Broads landscape to the north.

99. New development also has the potential to change the quality of the landscape within and surrounding the BNDP area, and it could lead to the loss of key landscape features, such as hedgerows and hedgerow trees.
100. The BNDP, alongside existing strategies, offers the opportunity to take a more coordinated approach to improving green infrastructure networks and access to green open space, which would be to the benefit of the local community.

Key Issues

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

SEA Objective

104. It is proposed that the SEA should include the following objective and assessment questions in relation to landscape:

Objective: To protect and enhance the character and quality of the immediate and surrounding landscape, including the Broads and strategic green infrastructure links.

Assessment Questions (will the option or proposal help to):

- Provide an opportunity for greater landscape buffer between the settlement and surrounding rural landscape?
- Protect, increase or enhance access to green infrastructure networks?
- Retain and enhance landscape features that contribute to the setting of the River Waveney and rural setting such as hedgerow and hedgerow trees?

Figure 11: The Broads Authority Executive Area

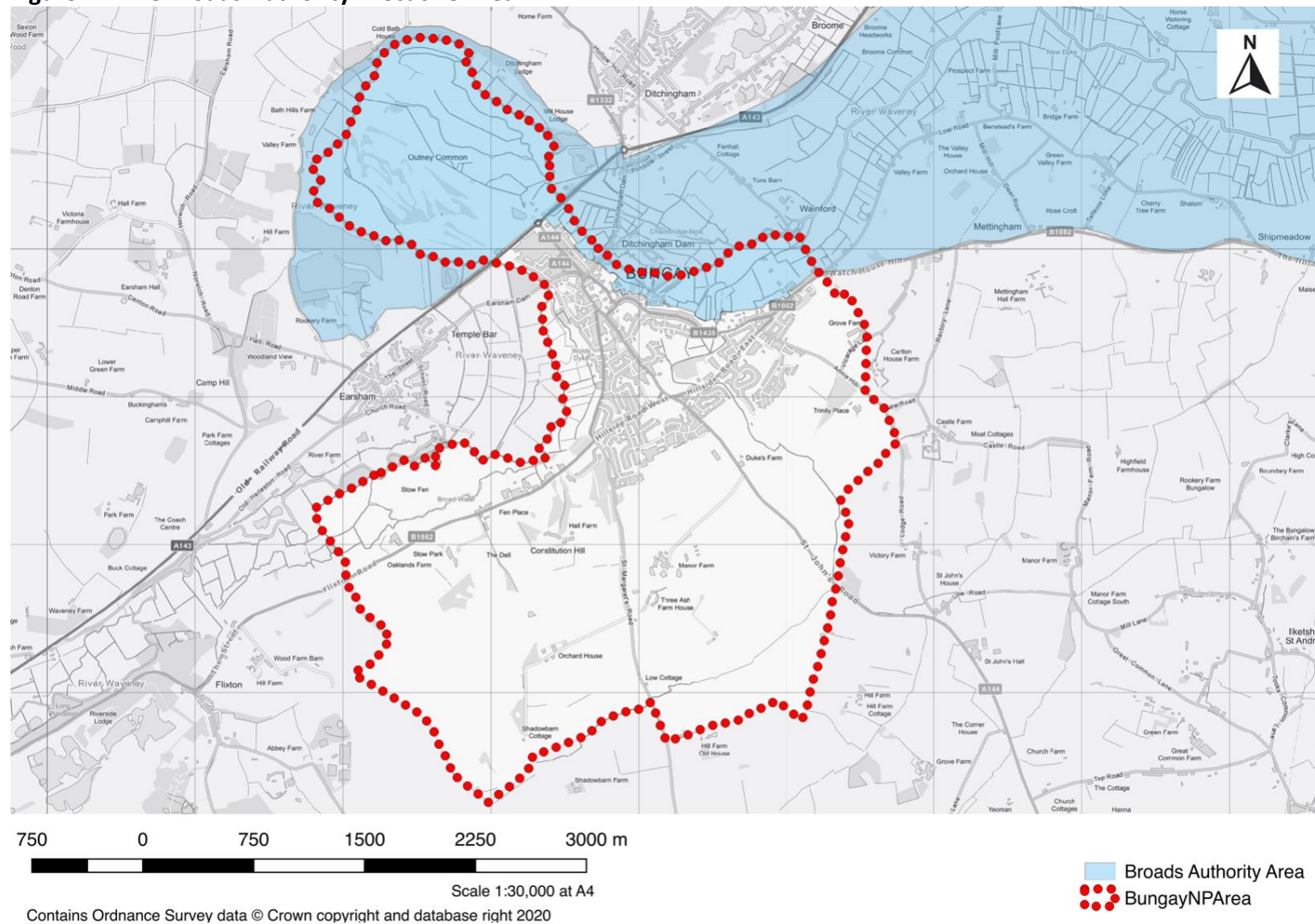
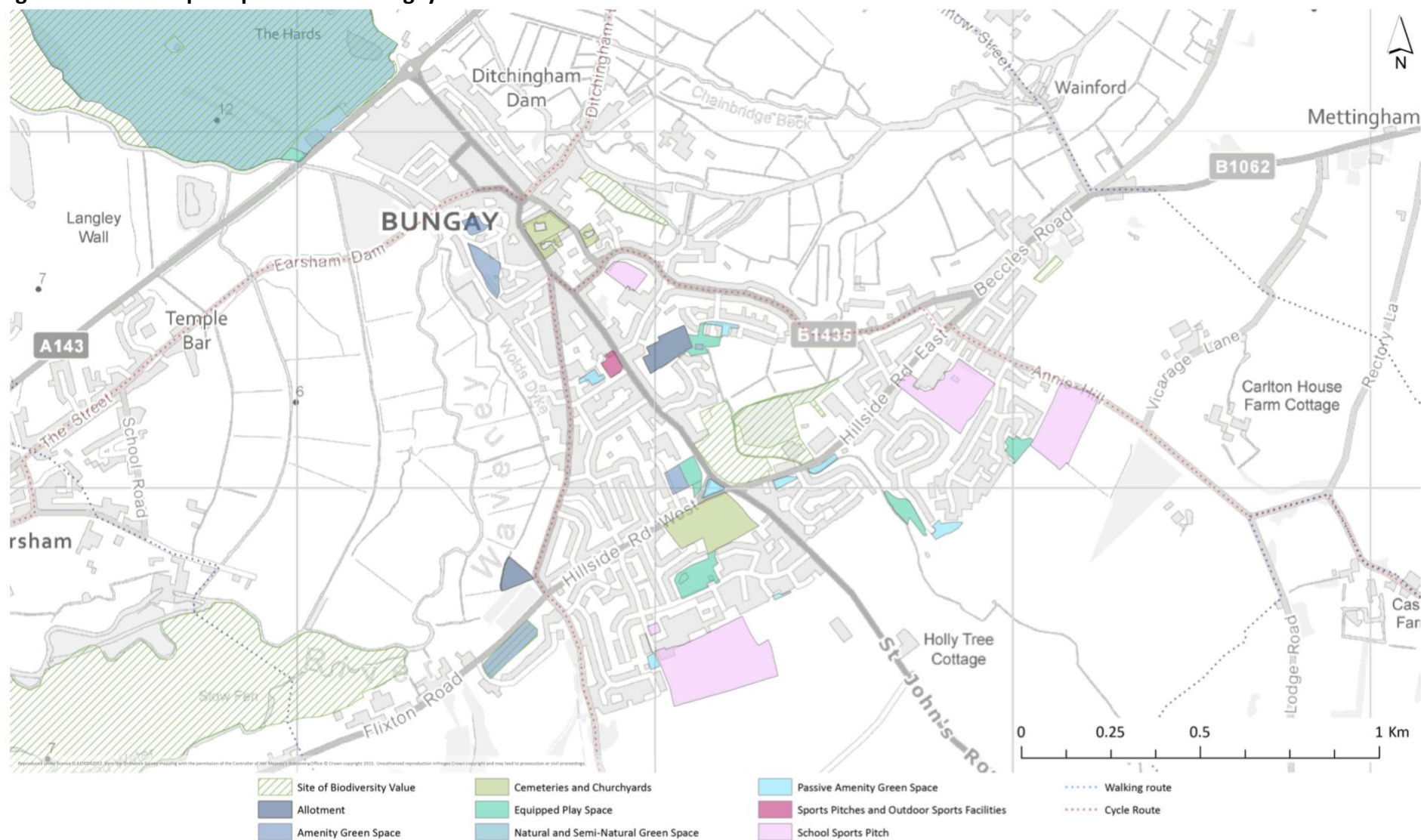


Figure 12: Green Open Space within Bungay



Source: Waveney Green Infrastructure Strategy, 2015

Water Resources, Soil and Land

105. This theme focuses on the quality of soil resources, the extent of mineral resources, water supply and quality in the BNDP area.

Policy Context

106. **National Planning Policy Framework (2019)**⁴⁴: This seeks to protect high quality soils, the best and most versatile agricultural land and improve the water environment. Wherever possible development should improve local environmental conditions including water quality. The NPPF looks to facilitate the sustainable use of minerals with local authorities required to plan for an adequate supply and great weight given to the benefits of mineral extraction.
107. **A Green Future: Our 25 Year Plan to Improve the Environment (2018)**⁴⁵: Key goals include achieving cleaner air and water by reducing harmful pollution and emissions, maximising resource efficiency, minimising environmental impacts, implementing sustainable drainage systems and improving water quality of rivers, lakes, coast and ground waters. Improving soil health as the foundation of farming and forestry is a key policy area.
108. **Safeguarding our Soils: A strategy for England (2009)**⁴⁶ This recognises that soil is a fundamental and non-renewable natural resource and critical component of our environment, providing ecosystem services relating to water regulation, carbon storage and supporting biodiversity. The strategy intends to reverse the trend of soil degradation and pollution.
109. **Essex and Suffolk Water - Water Resource Management Plan (2019)**⁴⁷ This is a 40-year plan that forecasts the demand for water in the future against the resources available. There is an intention to tackle the impacts of climate change and protect and improve the environment around the water resources they use.
110. **Waste Management Plan for England (2013)**⁴⁸ This provides an analysis of the waste management situation across England and sets out how the requirements of Article 28 of the Waste Framework Directive will be met. Emphasis is on moving to a zero waste economy where material resources are reused, recycled or recovered wherever possible.

⁴⁴https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

⁴⁵https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

⁴⁶<https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>

⁴⁷<https://www.nwg.co.uk/wrmp>

⁴⁸https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf

111. **Suffolk Minerals and Waste Local Plan (2020)**⁴⁹: This positively identifies and safeguards sites for the extraction and sustainable management of minerals and waste. None of these sites are within or near to the BNDP area.
112. **Local Plan for the Broads (2019)**⁵⁰ and **East Suffolk Council Waveney Local Plan (2019)**⁵¹: The local plans both contain policies intending to safeguard water quality and quantity, ensure the sustainable use of resources, protect soil and make the most efficient use of land.

Baseline

Water

113. The main waterbody in the BNDP area is the **River Waveney**. The source of the river Waveney is in the Regrave and Lopham Fen NNR, from where it travels east through the towns of Diss, Harleston, Bungay and Beccles. Finally, the Waveney flows past Burgh castle into Breydon Water joining the river Yare to reach the sea at Great Yarmouth. The Waveney branches off to Oulton Broad towards Lowestoft where a sea lock divides sea water, linking Oulton Broad with Lake Lothing and the sea. Parts of the river Waveney fall within the Broads NP and for much of its length forms the boundary between the counties of Norfolk and Suffolk.
114. Environment Agency records⁵² show that the Waveney catchment is made up of twenty waterbodies. All of the waterbodies which fall within and adjacent the BNDP area have consistently achieved a 'moderate' ecological status since 2013 and had good chemical status between 2013 and 2016. However, in 2019, they all failed in terms of their chemical status. Reasons for not achieving good status include; pollution from rural areas relating to agriculture and rural land management; pollution from wastewater and physical modifications. In relation to wastewater, The Rivers Trust report 'Is my river fit to play in?'⁵³ identifies that during 2019 there were 23 incidences of storm overflow from the sewers on Earsham Street and 4 incidences from Nethergate Street into the River Waveney. This is a concern given the current trend in more extensive use of the river for activities such as wild swimming and paddle boarding, both of which have become popular in the Bungay area over the last year.
115. The BNDP area is served by **Essex and Suffolk Water**, with Bungay falling into their Northern Central Water Resource Zone. Approximately 70% of the water supplied within this zone is sourced from surface water, the remainder sourced from groundwater. The River Waveney is one source of the surface water. The Water Resource Management Plan analyses supply and demand, factoring in climate change, it concludes that given

⁴⁹ <https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/suffolk-minerals-and-waste-development-scheme/>

⁵⁰ https://www.broads-authority.gov.uk/_data/assets/pdf_file/0036/259596/Local-Plan-for-the-Broads.pdf

⁵¹ <https://www.eastsuffolk.gov.uk/assets/Your-Council/WDC-Council-Meetings/2019/March/Council-20-03-19/Item-11-APPENDIX-A-Waveney-Local-Plan.pdf>

⁵² <https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3518/Summary>

⁵³ <https://www.riverstrust.org/2019/10/25/world-rivers-day-rivers-fit-to-swim-in/>

the supply surplus, no supply or demand schemes will be required. The plan overall prioritises demand management and promoting greater water efficiency.

116. Groundwater supplies around a third of the drinking water in the wider zone. The Environment Agency has designated Groundwater Source Protection zones, which include wells, boreholes and springs used for public drinking water sources. The groundwater from these zones all finishes up in a public drinking water supply, and it is essential to protect it from contamination from any activities that might cause pollution in the area. The closer the activity to the actual borehole, the greater the risk. Around half of the BNDP area falls within a **Groundwater Source Protection Zone**, predominantly Zone 3 but also a small area of Zone 2 and Zone 1 lies adjacent the area, see **Figure 13**. Further to this, the whole of the BNDP area lies within a **Drinking Water (Surface Water) Safeguard Zone**. These are areas identified as at risk of failing national drinking water protection objectives. Whilst these are non-statutory designations, action is taken within these areas to address water contamination, with the aim of avoiding extra treatment by water companies.

117. **Nitrate Vulnerable Zones (NVZs)** denote areas at risk from agricultural nitrate pollution and much of the East of England, including the whole of the BNDP area, is identified as an NVZ⁵⁴. These zones identify rules in relation to the use of fertilisers and manures as well as a requirement to prevent water pollution from farm areas.

Soil

118. The **Agricultural Land Classification (ALC)** classifies land into six grades – plus non-agricultural and urban, where Grades 1 to 3a are recognised as being the best and most versatile land and Grades 3b to 5 are of poorer quality. The BNDP area is predominantly Grade 3 land, with some Grade 4 around the River Waveney, and a very small patch of Grade 2 on the eastern edge of the area, see **Figure 14**. It is not possible to distinguish between Grade 3a and 3b in the provisional data available from Natural England, and therefore uncertain whether the majority of the plan areas is considered to be the best and most versatile or not.

119. The Predictive Best and Most Versatile Land Assessment⁵⁵ indicates that the western extent of the area of 3B has a high likelihood (>60%) of Best and Most Versatile Land, with the remainder a moderate likelihood (20-60%).

Geology, Minerals and Waste

120. The bedrock geology of the BNDP area is sand, a sedimentary bedrock formed between 5.333million and 11.8 thousand years ago during the Neogene and Quaternary periods. There are also superficial deposits of Lowestoft Formation – Diamicton (chalky till together with outwash sands and gravels, silts and clays), and Happisburgh Glacigenic Formation – Sand. Superficial deposits in the immediate vicinity of the River Waveney include River Terrace deposits of sand and gravel and Breydon Formation – Clay and silt⁵⁶.

⁵⁴ <https://environment.data.gov.uk/farmers/>

⁵⁵ <http://publications.naturalengland.org.uk/publication/6205542189498368?category=5208993007403008>

⁵⁶ <https://mapapps.bgs.ac.uk/geologyofbritain3d/>

121. The Suffolk Minerals and Waste Local Plan⁵⁷ does not propose any new minerals or waste sites within the BNDP area. However, the whole area does fall within a Minerals Consultation Area, defined to ensure that minerals resources are not unnecessarily serialised through planning.

Future Baseline

122. Requirements of the Water Framework Directive, and national legislation, are likely to lead to continued improvements to water quality in the BNDP and wider area. Additionally, the Water Resource Management Plan for Essex and Suffolk Water, which plans up to 2045, will continue to address water supply and wastewater management issues. However, future development has the potential to affect water quality through increased consumption, waste-water discharges, water run-off, diffuse pollution and modification.
123. Development has the potential to affect both soil and mineral resources in the BNDP area, including through the loss of agricultural land which has a high potential of being the best and most versatile.

Key Issues

124. Recent data indicates that the chemical status of water in the BNDP area has declined, and this could be exacerbated by further growth. The BNDP should ensure that measures are taken to avoid detrimental impacts and where possible improve water quality through development.
125. There is high potential for the best and most versatile agricultural land to exist within the BNDP area, though the precise classification is unknown. BNDP provides the opportunity to avoid or minimise the loss of agricultural land in these areas.
126. With regards to mineral safeguarding areas, the BNDP falls within a minerals consultation area, which means that sand and gravel resources may be present and need to be safeguarded

SEA Objectives

127. It is proposed that the SEA should include the following objective and assessment questions in relation to water resources, soil and land:

Objective 1: To protect and enhance the water quality and use and manage water resources in a sustainable manner.

Assessment Questions (will the option or proposal help to):

- Avoid impacts on water quality and promote improvements?
- Promote the use of sustainable drainage systems?
- Protect waterbodies from pollution?
- Maximise opportunities for water efficiency?

⁵⁷ <https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/suffolk-minerals-and-waste-development-scheme/>

Objective 2: Promote the efficient use of land.

Assessment Questions (will the option or proposal help to):

- Avoid the loss of the best and most versatile agricultural land?
- Promote the use of previously developed or underutilised land?
- Avoid the unnecessary sterilisation of access to mineral resources in the BNDP area?

Figure 13: Water Resources

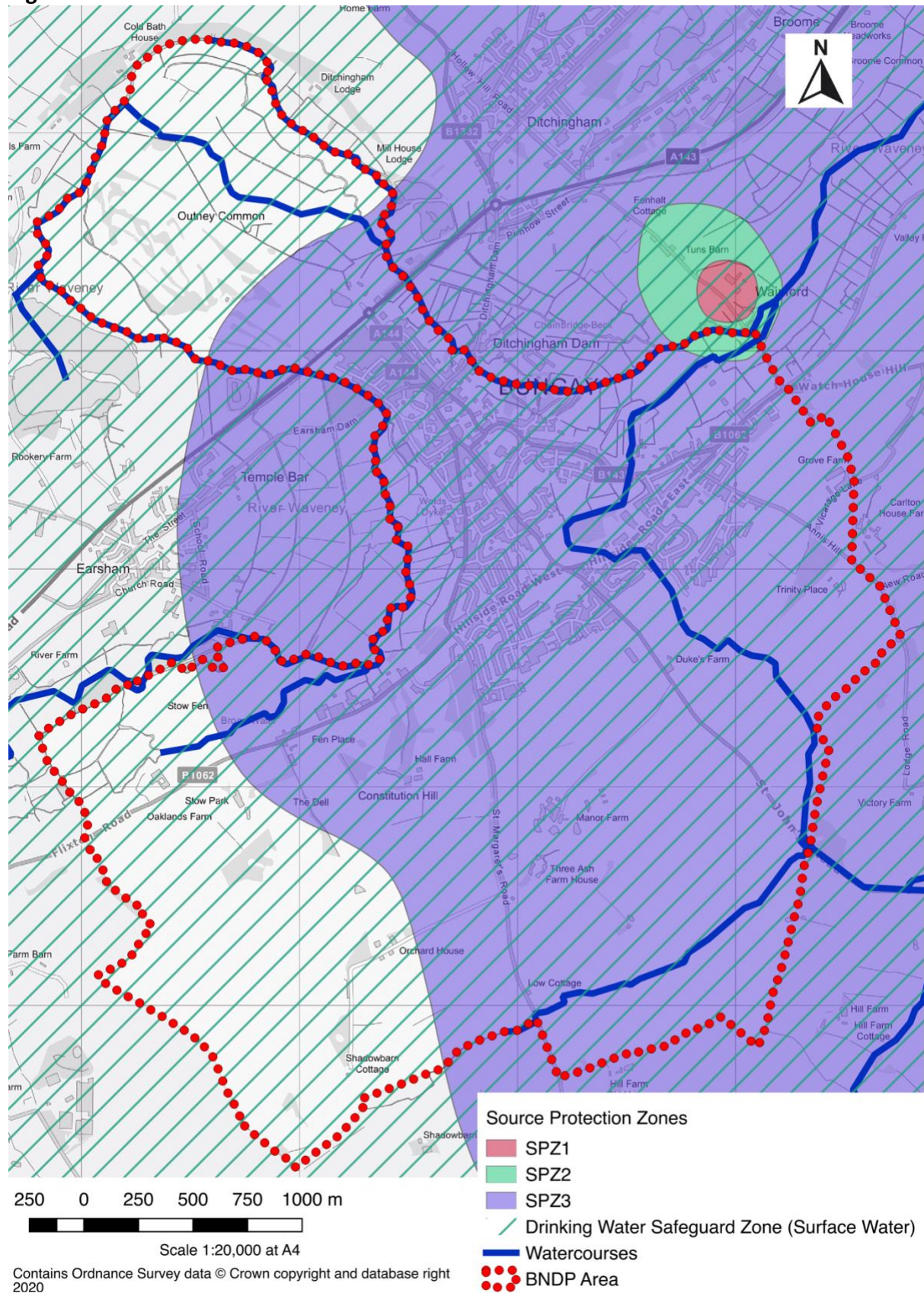
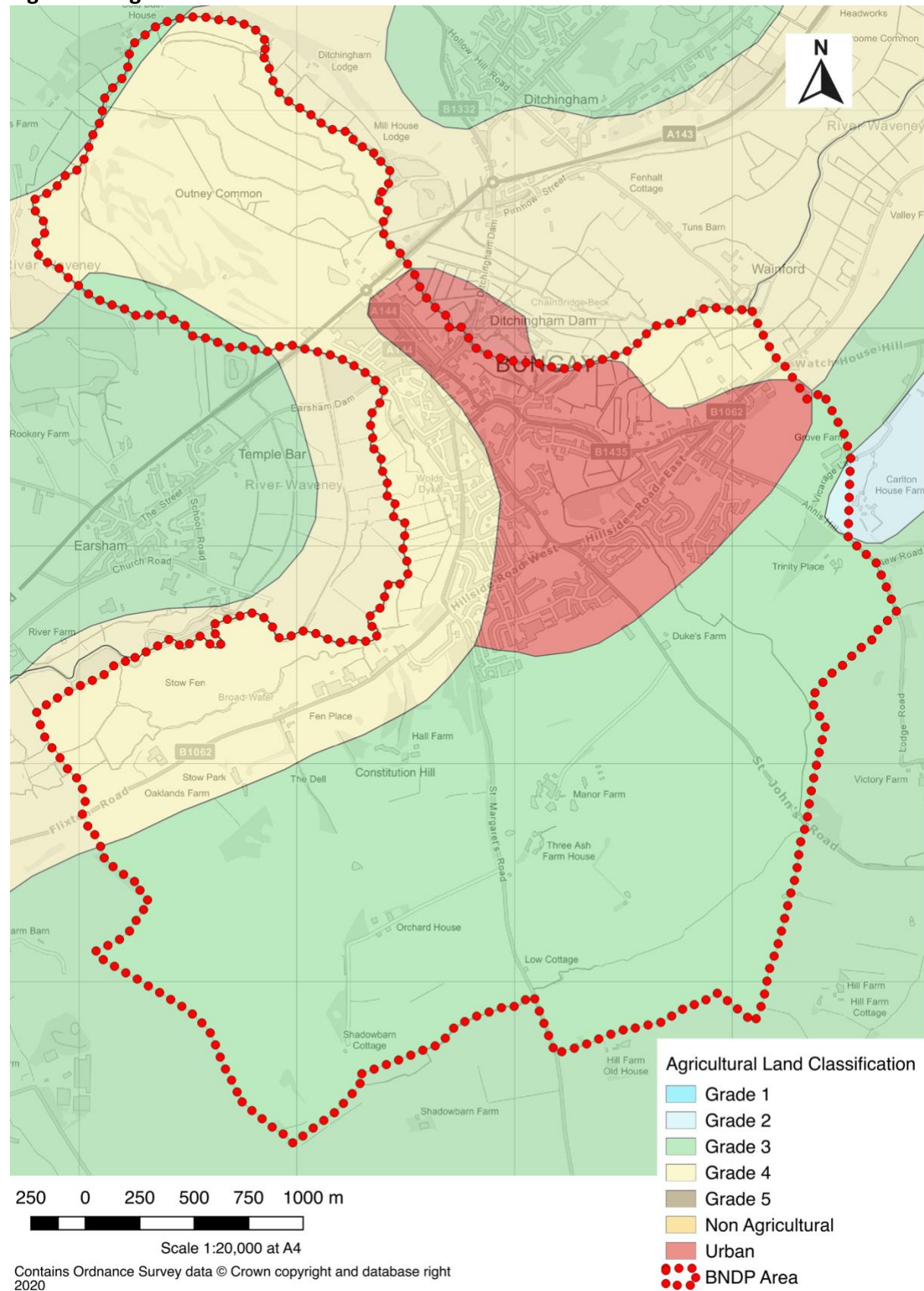


Figure 14: Agricultural Land Classification



Historic Environment

128. This theme focuses on designated and non-designated heritage assets and their setting.

Policy Context

129. **National Planning Policy Framework (2019)**⁵⁸: Section 16 of the NPPF sets out that heritage assets should be conserved in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of existing and future generations. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment.
130. **A Green Future: Our 25 Year Plan to Improve the (2018)**⁵⁹: This recognises that heritage has an economic, social and environmental value and makes an important contribution towards achieving a healthier environment.
131. **Heritage Statement (2017)**⁶⁰: This sets out the government's direction and priorities for England's heritage. It is structured around the key themes of creating great places; heritage for everyone; heritage is international; and creating a sustainable and resilient heritage sector. There is emphasis on heritage being accessible and benefiting everyone in society.
132. **Neighbourhood Planning and the Historic Environment, Historic England Advice Note 11 (2018)**⁶¹: This provides support for groups developing Neighbourhood Plans in relation to building up evidence in relation to the historic environment, considering opportunities for conserving and improving heritage, bringing heritage into design and preparing a local list of heritage assets.
133. **Local Heritage Listing: Identifying and Conserving Local Heritage (2021)**⁶²: This sets out that non-designated heritage assets can be identified in Neighbourhood Plans and guidance to ensure consistency of identification.
134. **The National Design Guide (2019)**⁶³: Within this, heritage is considered a key part of the context or location for development. There is an expectation that proposals positively relate to the history and heritage of the site and its setting.

⁵⁸https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

⁵⁹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

⁶⁰https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/664657/Heritage_Statement_2017_final_-_web_version_.pdf

⁶¹<https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/neighbourhood-planning-and-the-historic-environment-historic-england-advice-note-11/>

⁶²<https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/heag301-local-heritage-listing/>

⁶³https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962113/National_design_guide.pdf

135. **East Suffolk Council Waveney Local Plan (2019)**⁶⁴: This sets out a requirement for all heritage assets (designated and non-designated) to be positively protected and enhanced. All development proposals which have potential to impact on heritage assets or their settings should be supported by a Heritage Impact Assessment.
136. **Local Plan for the Broads (2019)**⁶⁵: This requires that key buildings, structures and features which contribute to the Broads' character and distinctiveness will be protected from inappropriate development or change. Repair or reuse of heritage assets is encouraged. There is an intention to better understand, protect and enhance the archaeology of the Broads, in recognition of the area's status as having 'exceptional waterlogged heritage'.

Baseline

137. In terms of nationally designated assets, within the BNDP area there are 189 **listed buildings**, including four Grade I and four Grade II* listed. These are identified in **Figure 15**. Of note includes:
- Bungay Castle (Grade I): the remains of an early medieval castle, its keep, gatehouse, curtain wall and substantial remnants of the castle's inner bailey wall. The upstanding historic fabric forms a centrepiece of a more extensive historic landscape encompassing the castle site's defensive earthworks and the area enclosed by these defences, sections of which are designated as scheduled monuments.
 - Holy Trinity Church (Grade I): Bungay's oldest building with a distinct round tower that dates to the late Saxon period.
 - St Mary's Church (Grade I): impressive 12th century church built to serve a small Benedictine priory, the ruins of which can still be seen in the churchyard to the east.
138. There are three **scheduled monuments** within the plan area – Bungay Castle, Castle Hills and The Butter Cross, which was once a prison. Bungay Castle is also on the Heritage At Risk Register. The **Heritage At Risk Register** identifies designated assets which are at most risk of being lost as a result of neglect, decay or inappropriate development. Just outside of the plan area is Mettingham Castle, another scheduled monument which is on the at-risk register.
139. A proportion of the town is designated a **Conservation Area** by East Suffolk Council. The Conservation Area Character Appraisal⁶⁶ sets out that Bungay has a rich history, with evidence of human activity going back at least six thousand years. The site of the town had strategic potential as a crossing point of the river, and its elevated position made it defensible. The town grew first in response to its strategic significance and then through local trade, abetted by improvements in river, road and rail services in the 17th and 18th century. Substantial rebuilding of the town following fires in the late 17th century determined much of its architectural character.

⁶⁴ <https://www.eastsuffolk.gov.uk/assets/Your-Council/WDC-Council-Meetings/2019/March/Council-20-03-19/Item-11-APPENDIX-A-Waveney-Local-Plan.pdf>

⁶⁵ https://www.broads-authority.gov.uk/_data/assets/pdf_file/0036/259596/Local-Plan-for-the-Broads.pdf

⁶⁶ East Suffolk Council (2007) Bungay Conservation Area Character Appraisal [online] available at <https://www.eastsuffolk.gov.uk/assets/Planning/Design-and-Conservation/Conservation-Area-Appraisals/Bungay-Conservation-Area-Character-Appraisal.pdf>

140. The spaces within the town are generally linear, enclosed by two or three storey buildings at the street edge. The general character is building dominated, and of local vernacular character. There is significant visual unity in architectural style and materials which imparts a specific character. Georgian style, red or yellow brick and colour washed timber frame with red or black pantile roofs in the central area; 19th century brick terraced houses within pantile or slate roofs in The Ollands Area; small scale 19th century artisan red brick terraces in Southend Road; and a 19th century industrial character in the Staithe Area.
141. St Mary's Church (Grade I listed) is 27m high and is the major landmark of the town centre. From outside the town the tower is visible from the south across the Ollands meadows, from the A144 at Dukes Farm; from Earsham Dam west of the town; and from the northern bypass.
142. Not all elements of the historic environment are protected under statutory designation. **Non-designated heritage assets** are locally identified buildings, monuments, sites, places, areas or landscapes identified by plan making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets. The Conservation Area Appraisal identifies to over 150 non-listed buildings and structures of importance within the town centre.
143. There may well be more heritage assets of local importance that could be identified within the wider parish. The **Historic Environment Record** lists details on local archaeological finds and sites, historic buildings and landscapes. For Bungay it has 86 records including monuments, find spots, farmsteads and buildings from a range of periods. One building of note in Bungay Town Centre is the **King's Head Hotel**, a former coaching inn which occupies a prominent location and has been empty in need of restoration since 2010. The building makes a considerable impact on the streetscene in the historic town centre, it was recently purchased by a developer.
144. Bungay's heritage is part of what makes it a popular destination for visitors. The Bungay Museum, established in 1963, displays items charting the town's history, society and business, helping to make the areas heritage more accessible to the public.
145. The **Bungay Neighbourhood Plan Design Guidelines**, 2019⁶⁷, developed by AECOM, sets out the principle characteristics of the historic core as:
- The curvy linear layout reflects an unfolding pattern, creating enclosed and open views and distinctive spaces;
 - Built form defines the streetscape; the historic core achieves this in part through unity of building line, with the built form often accommodating varied architectural styles/typologies;

⁶⁷<https://www.bungaytowncouncil.gov.uk/docs/NDP/BUNGAY%20NEIGHBOURHOOD%20PLAN%20DESIGN%20GUIDELINES.pdf>

- A comfortable variation in the size and scale of buildings (two and three storeys) which enhances its character of variety and difference, as opposed to homogeneity;
- The mature landscape within the town centre is comprised of mainly the church yards and front gardens contrasting the enclosed and dense arrangement of the narrow streets;
- Within the conservation area most of the buildings are directly fronting the street without any private space;
- Outside the historic core, development during the 20th century and early 21st century has departed from this traditional pattern towards more peripheral 'cell' housing estates.

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

Future Baseline

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

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

Key Issues

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

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

SEA Objective

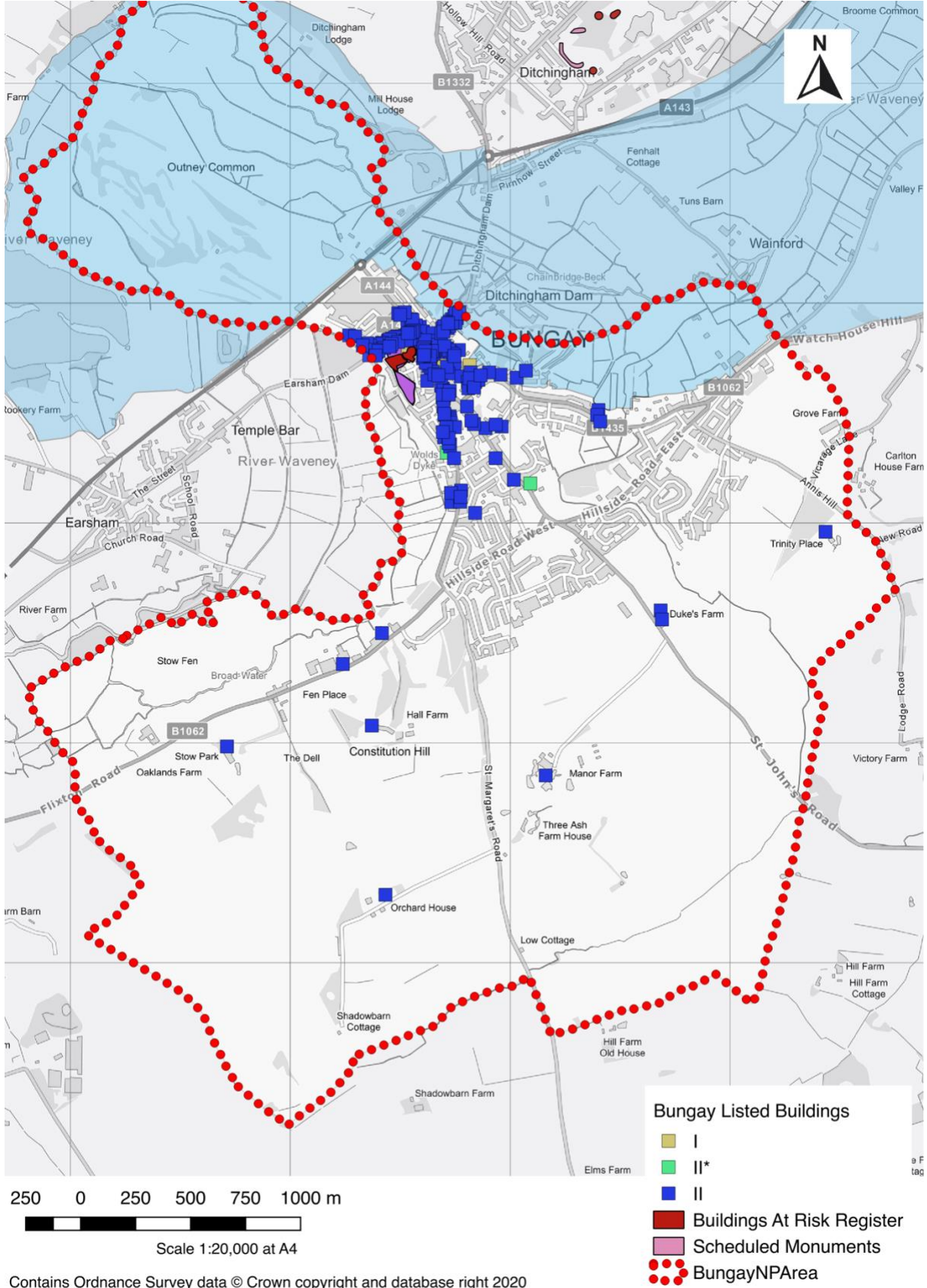
151. It is proposed that the SEA should include the following objective and assessment questions in relation to heritage.

Objective: To protect, conserve and enhance the historic environment within and surrounding the BNDP area and create a sustainable and attractive town centre environment.

Assessment Questions (will the option or proposal help to):

- Conserve and enhance buildings of architectural or historic interest, including designated and non-designated assets and their settings?
- Conserve and enhance locally important heritage features within the BNDP area?
- Support improved access to and understanding of heritage assets, historic character and its evolution in the BNDP area?
- Enhance the public realm within the town centre?
- Ensure design of any new development retains and enhances the local character and historic distinctiveness of Bungay in line with the Design Guide?

Figure 15: Designated Heritage Assets in Bungay



Population and Health

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

Policy Context

153. **National Planning Policy Framework (2019)**⁶⁸: Enable and support healthy lifestyles through the provision of appropriate infrastructure, services and facilities including green infrastructure, allotments and layouts which encourage walking and cycling.
154. **Equality Act (2010)**: this was brought in to reduce inequality and discrimination and ensure all members of the community are provided with equal opportunities. The Act covers nine protected characteristics – age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, marriage and civil partnership. The Public Sector Equality Duty, set out in Section 149 of the Act, requires public bodies to give due regard to the need to promote equality of opportunity, tackle unfair discrimination and promote good relations between different people.
155. **Health Equity in England: The Marmot Review 10 Years On (2020)**⁶⁹: This identifies that the health gap between less and more deprived areas has grown in the last 10 years. Those living in deprived communities spend more of their lives in poor health and improvements in life expectancy have stalled or declined for the poorest 10% of women.
156. **Suffolk Joint Health and Wellbeing Board Strategy Refresh 2019-2022 (2019)**⁷⁰: This provides a vision and policy framework for Suffolk partners to improve the overall health and wellbeing of people in Suffolk. It encourages integrated working between the NHS, local authorities, the police and other public and voluntary sector organisations.
157. **East Suffolk Council Waveney Local Plan (2019)**⁷¹: This contains policies relating to access to healthcare, green infrastructure, open spaces, design and active travel. Additionally, the strategy for Bungay, which allows for modest growth, recognises a specific need to deliver improvements in medical provision and green infrastructure, including allotments and access to new green open space.
158. **Local Plan for the Broads (2019)**⁷²: This encourages development that supports healthy choices, behaviours and a reduction in health inequalities. There are policies relating to green infrastructure, open space, amenity, design and sustainable travel and tourism.

⁶⁸https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

⁶⁹<https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

⁷⁰<https://www.suffolk.gov.uk/assets/council-and-democracy/our-aims-and-transformation-programmes/Joint-Health-and-Wellbeing-Board-Strategy-Refresh-2019-2022.pdf>

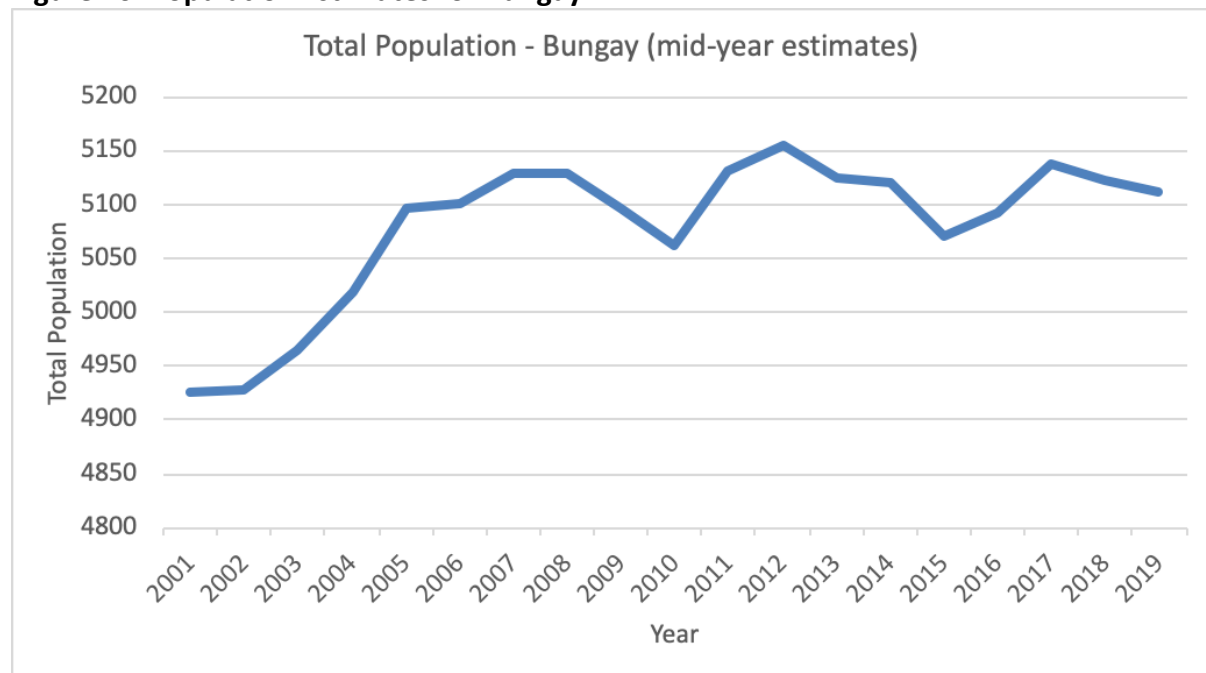
⁷¹<https://www.eastsuffolk.gov.uk/assets/Your-Council/WDC-Council-Meetings/2019/March/Council-20-03-19/Item-11-APPENDIX-A-Waveney-Local-Plan.pdf>

⁷²https://www.broads-authority.gov.uk/_data/assets/pdf_file/0036/259596/Local-Plan-for-the-Broads.pdf

Baseline

159. According to ONS mid-year **population estimates** for 2019, there are currently 5,112 people living within the BNDP area⁷³. **Figure 16** Provides an overview of the estimated population from 2001 to 2019, the population has remained fairly static with only a slight upward trend representing a 4% increase from 2001.

Figure 16: Population Estimates for Bungay

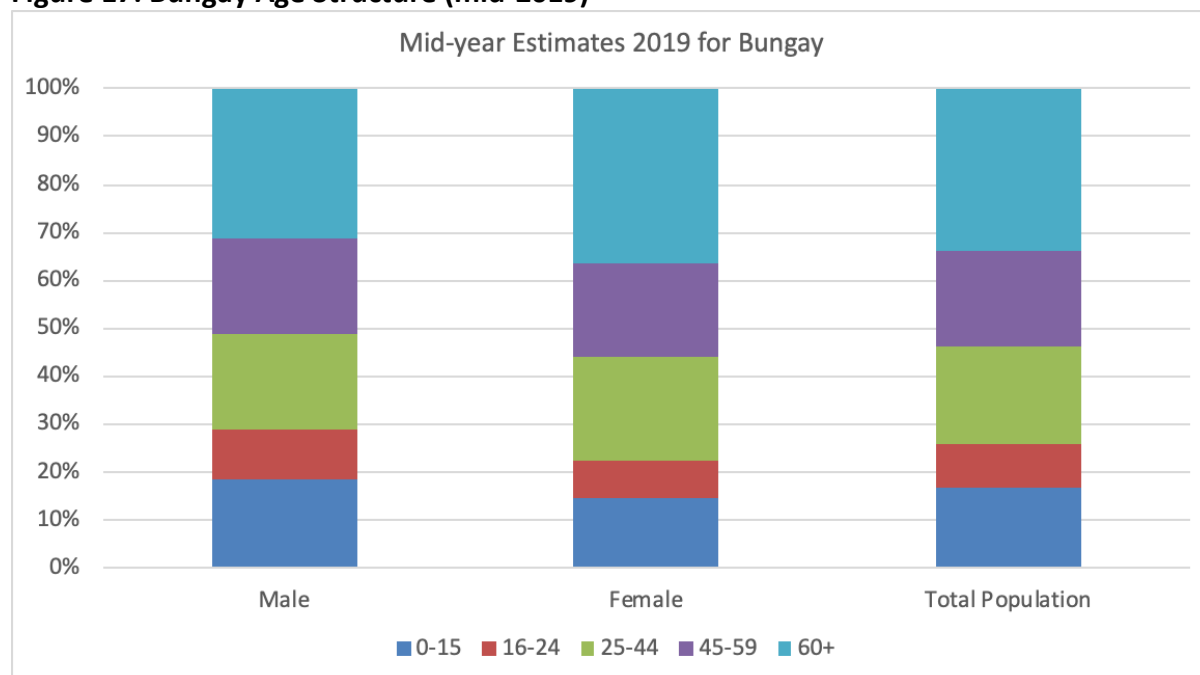


160. The **age structure** in mid-2019 is provided in **Figure 17**. Just over a third of residents are aged over 60 years, which is somewhat higher than the England average and Bungay has an ageing population. There is a slight variation by gender, 36% of females are aged 60+ compared to 31% of males who make up a higher proportion of the younger age groups.

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

⁷³ Parish population estimates for mid-2001 to mid-2019 based on best fitting of output areas to parishes. Online: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/adhocs/12324parishpopulationestimatesformid2001tomid2019basedonbestfittingofoutputareastoparishes>

Figure 17: Bungay Age Structure (mid-2019)



162. The **Bungay Housing Needs Assessment (HNA) 2019**⁷⁴, developed by AECOM on behalf of the Bungay Neighbourhood Plan Group provides detailed analysis with respect to tenure, type and size of housing need within the BNDP area. This identifies that for households on lower incomes, the options regarding housing are very limited, and the provision of housing for social rent should be a priority. Given the limited number of smaller dwellings, demographic trends point to not enough supply, and to avoid misalignment, the report recommends 19% of new homes should be one-bedroomed, 42% two bedroomed and 39% three bedroomed.

163. The **Index of Multiple Deprivation 2019 (IMD)**⁷⁵ is a relative measure of deprivation based on seven different domains, income; employment; education, skills and training; health and disability; crime; barriers to housing and services; and living environment. Deprivation is measured in a broad way to encompass a wide range of aspects of an individual's living conditions, with each of the domains constructed from a basket of measures. The IMD ranks every small area in England from 1 (most deprived) to 32,844 (least deprived).

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

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

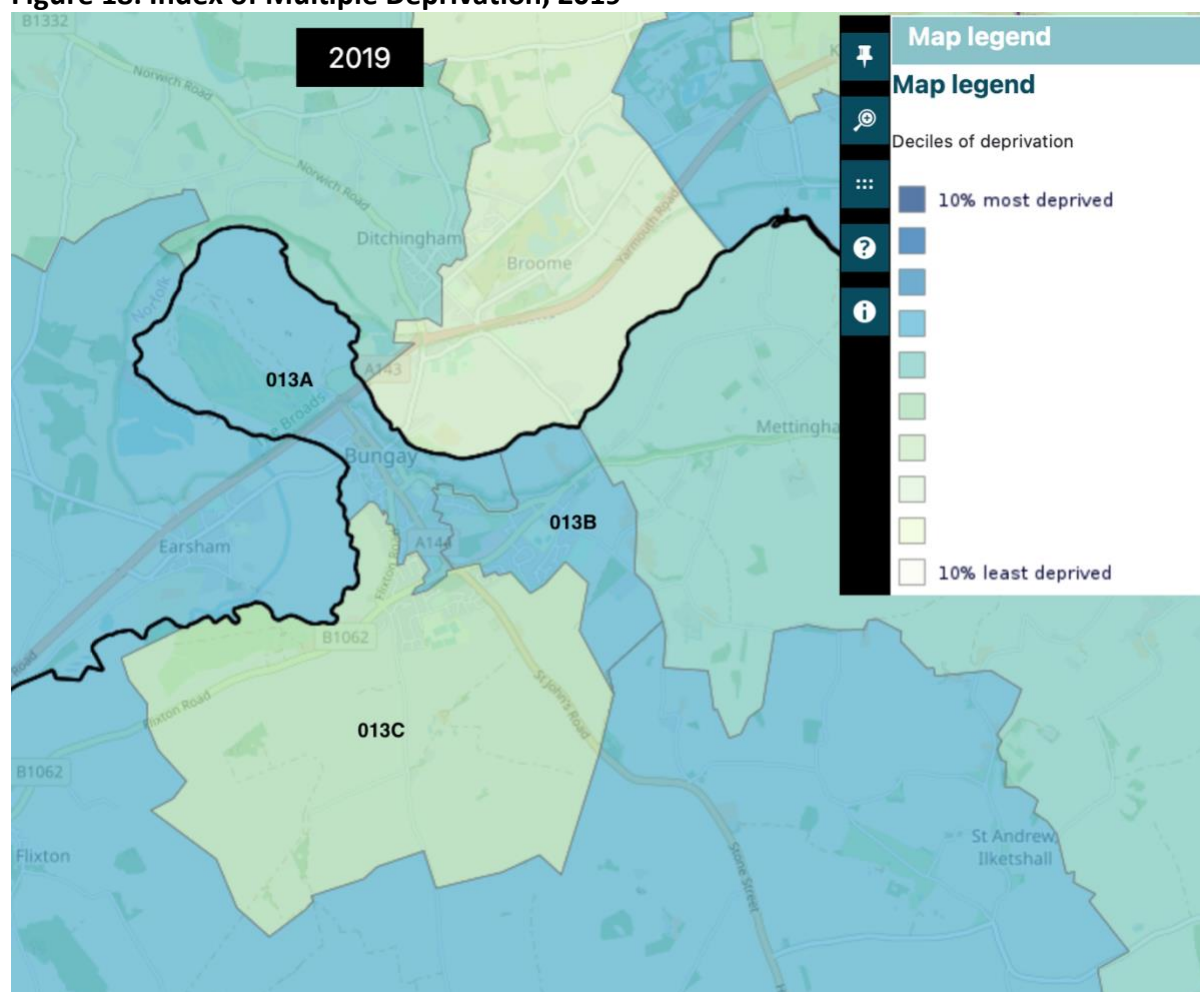
⁷⁴

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

⁷⁵ <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

165. **Figure 18** highlights that two of the areas, 013B and 013A, fall within the 40% most deprived in England whilst 013C falls within the is amongst one of the 50% least deprived neighbourhoods. The areas of highest deprivation are within the built-up area of the town. Income, employment and education deprivation are highest in LSOA 013B, which falls amongst the 30% most deprived areas for each of those domains. Where income deprivation is relatively high this tends to affect children more than older people. LSOA 013A falls within the 20% most deprived neighbourhoods for the living environment domain which measures both the quality of the indoor and outdoor local environment. All of the areas perform well in relation to the barriers to housing and services and crime domain.

Figure 18: Index of Multiple Deprivation, 2019



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

167. 2011 Census data indicates that 21% of Bungay residents consider themselves to have a limiting long-term illness which limits their day-to-day activities. This is slightly higher than national levels, but similar to Waveney. When asked, 42% of people said

that they were in 'very good health' and a further 36% in 'good health'. Almost 2% indicated they were in 'very bad health' and almost 5% in 'bad health'. These figures are very similar to the district average. Around 10% of the population provides some level of unpaid care.

168. At a local authority level, Public Health England publishes a **health outcomes** framework summary⁷⁶. Data for 2019/20 indicates that Waveney is not significantly different from England for any of the overarching health indicators. Life expectancy is 79.8 years for males and 83.4 years for females, with inequality 9.4y and 7.6y respectively. If you look at wider determinants of health, improvement, prevention and early mortality there are seven areas where Waveney indicators are significantly worse than England. Of note, there are two indicators relating to adult obesity and inactivity and the dementia diagnosis rate. There are 15 areas where the Waveney indicators are significantly better including childhood obesity rates, hospital admissions due to falls and emergency re-admissions within 30 days of discharge from hospital.

Future Baseline

169. The population overall has only increased slightly over the last 15 years, but with planned development (485 new homes through the current Local Plan) this is expected to increase significantly. The town currently has a relatively high proportion of older residents, though this profile may change slightly depending on the type of housing built.
170. Planned development may also affect the housing profile, with more recent development increasing the stock of semi-detached properties within the area. New development is likely to deliver more affordable housing, which may increase the level homes which are rented.

Key Issues

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

⁷⁶ <https://fingertips.phe.org.uk/static-reports/public-health-outcomes-framework/at-a-glance/E07000206.html?area-name=Waveney>

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

SEA Objective

175. It is proposed that the SEA should include the following objective and assessment questions in relation to population and health.

Objective: To improve the health and wellbeing of residents within the BNDP area

Assessment Questions (will the option or proposal help to):

- Increase availability of smaller affordable homes?
- Promote the use of active travel such as walking and cycling?
- Promote recreational activities involving walking and cycling, including access into the wider countryside via public rights of way
- Provide greater access to green space?
- Enhance accessibility to a range of services including health, leisure and community facilities?
- Avoid negative impacts on existing services and facilities?

Accessibility and Transport

176. This theme covers access to services and facilities.

Policy Context

177. **National Planning Policy Framework (2019)**⁷⁷: Development should be delivered in sustainable locations where there is good access to services and facilities and opportunities are taken to create safe, accessible environments with high-quality public spaces. Healthy lifestyles should be supported through provision of green infrastructure, sports facilities, local shops and encourage walking and cycling.

178. **Decarbonising Transport: Setting the Challenge (2020)**⁷⁸: This sets a framework for decarbonising transport, to achieve net zero emissions across every mode of transport by 2050. Emphasis is on renewing the road fleet but also creating a modal shift to public transport, walking and cycling and also creating better places to live where people have good access to jobs, health and other services.

179. **The Department for Transport's Cycling and Walking Investment Strategy (2016)**⁷⁹: This aims to make cycling and walking the natural choice for shorter journeys, or as part of a longer journey. It is recognised that transformative change is required to realise this, and sustained investment in walking and cycling infrastructure will be required alongside behavioural/attitude changes. It sets a strategy across three themes; better safety; better mobility; and better streets.

180. **Suffolk Local Transport Plan 2011-31 (2011)**⁸⁰: This sets a strategy for transport investment over the longer term, with a priority of supporting the growth of business, reducing the demand for car travel, making efficient use of transport networks and improving infrastructure.

181. **East Suffolk Council Waveney Local Plan (2019)**⁸¹: This sets out requirements for new development which aim to improve the use of sustainable transport options and reduce the risk of congestion. It sets the basic principles of development being located close to and providing safe pedestrian and cycle access to services, being well integrated with existing networks, reducing conflict between different modes and improving public transport in rural areas.

182. **Waveney Cycle Strategy (2016)**⁸²: This sets out a range of measures to improve the cycle network and encourage people to become more active. WLP8.21 on Sustainable

⁷⁷https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

⁷⁸https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf

⁷⁹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/512895/cycling-and-walking-investment-strategy.pdf

⁸⁰<https://www.suffolk.gov.uk/roads-and-transport/transport-planning/transport-planning-strategy-and-plans/>

⁸¹<https://www.eastsuffolk.gov.uk/assets/Your-Council/WDC-Council-Meetings/2019/March/Council-20-03-19/Item-11-APPENDIX-A-Waveney-Local-Plan.pdf>

⁸²<https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Waveney-Cycle-Strategy.pdf>

Transport in the East Suffolk Council Waveney Local Plan requires developers to have due regard of and deliver improvements set out within this plan.

183. **Local Plan for the Broads (2019)**⁸³: Improvements that enable access to facilities, services and settlements within the Broads will be sought in a manner and level which is compatible with sustainability objectives and the special qualities of the Broads. Community facilities and services are seen to support the sustainability of communities and their retention is supported.
184. **Broads integrated access strategy (2019)**⁸⁴ sets out how accessibility improvements will be delivered in the Broads to encourage sustainable travel choices, relieve visitor pressure on internationally designated sites and ensure appropriate levels of information on accessing recreational activities.

Baseline

185. In terms of strategic **road connections**, the A143 runs through the BNDP area, just to the north of the town centre. This connects Bungay with Lowestoft and Beccles. The A144 also provides a link to Halesworth in the south, dissecting the town centre. The number of HGVs which use the A144 through the town centre is a longstanding concern. This is recognised by both the business community and East Suffolk Council as impacting on the economy, historic environment and safety of those walking and cycling.
186. The BNDP area is relatively well served by **buses** and there are a number of routes that run through the town centre, linking it with the surrounding area, including Norwich.
187. Many **key services** are located in the town centre along Earsham Street, the Market Place and St Mary's Street, and with the town fairly compact there is an opportunity to encourage people to walk or cycle to access these. Parking is also constrained within the town centre, which is identified in the Retail and Leisure Needs Assessment 2016. There are currently 5 council run car parks providing 172 spaces which is the lowest number for a town in the District⁸⁵.
188. **Cycle provision** in Bungay is limited. Cycle routes connecting the town centre, residential areas and community facilities consist of indirect routes that are fragmented and difficult to navigate. The built-up area follows a north-south axis with existing cycle routes following corridors that have poor surfaces and are not well overlooked. To reach the town centre it is necessary to cycle along busy roads including St John's Hill and Hillside Road, and at points there are conflicts between people and vehicles, including HGVs. The Waveney Cycle Strategy identifies a number of improvements which can be

⁸³ https://www.broads-authority.gov.uk/data/assets/pdf_file/0036/259596/Local-Plan-for-the-Broads.pdf

⁸⁴ https://www.broads-authority.gov.uk/data/assets/pdf_file/0020/260822/Appendix-Broads-Integrated-Access-Strategy-and-action-plan.pdf

⁸⁵ Carter Jonas, Waveney District Council: Retail and Leisure Needs Assessment 2016 available online: <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Waveney-Retail-and-Leisure-Needs-Assessment-2016.pdf>

made to the cycle network to encourage more trips on bike⁸⁶. In terms of long-distance routes, National Cycle Route 1 and Regional Cycle Route 30 link Bungay to Beccles, Harleston and on to Eye.

189. **Figure 19** highlights the **Public Rights of Way** that runs through the BNDP area. This shows that there is good access into the wider countryside from the main residential areas. Public footpaths are particularly prevalent in the south of the area.
190. In terms of **travel to work**, most working people who live in the BNDP area do not work in the town. The 2011 Census indicates over 80% of households have access to at least one car or van, and that most travel to work journeys were made by car in 2011. It is recognised that the recent pandemic will have affected this considerably, with a significant shift towards homeworking. It is anticipated that new travel patterns will continue to prevail to some extent into the future.
191. The strategy for Bungay in the East Suffolk Council Waveney Local Plan identifies a range of infrastructure and **local facilities** that should be delivered alongside growth. This includes:
- Extension to the High School playing fields and new bus parking area
 - A new pre-school and additional capacity at the primary school
 - Expansion of Bungay Medical Centre
 - Improved library provision
 - A new community centre
 - New play parks, football pitch and allotments.
192. It should be noted in respect to this, a new Community Centre at the rear of the playing field at Old Grammar Lane is nearing completion, and Bungay Medical Centre is no longer considered to require expansion to support growth.

Future Baseline

193. National investment programmes and future development in the BNDP area is likely to lead to ongoing investment in walking and cycle infrastructure. Existing strategies including the Waveney Cycle Strategy will ensure these are directed in the right place and should enhance accessibility by these modes, encouraging more active travel.
194. Lasting impacts of the current pandemic on people's travel patterns are anticipated, with the prevalence of home working likely to continue. This may result in more people making use of local services in the town centre.

Key Issues

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

⁸⁶ Waveney District Council, Waveney Cycle Strategy – improving the cycle network and encouraging people to become more active, 2016

196. It is possible that future development on the outskirts of the town could result in more people driving into the town centre to access key services and facilities. It is important that there is investment in local infrastructure and services alongside development, and good walking and cycle routes are established that link with the town centre.
197. The impact of HGVs travelling through the town centre is felt by residents and recognised to impact upon the economy, safety and historic environment.

SEA Objective

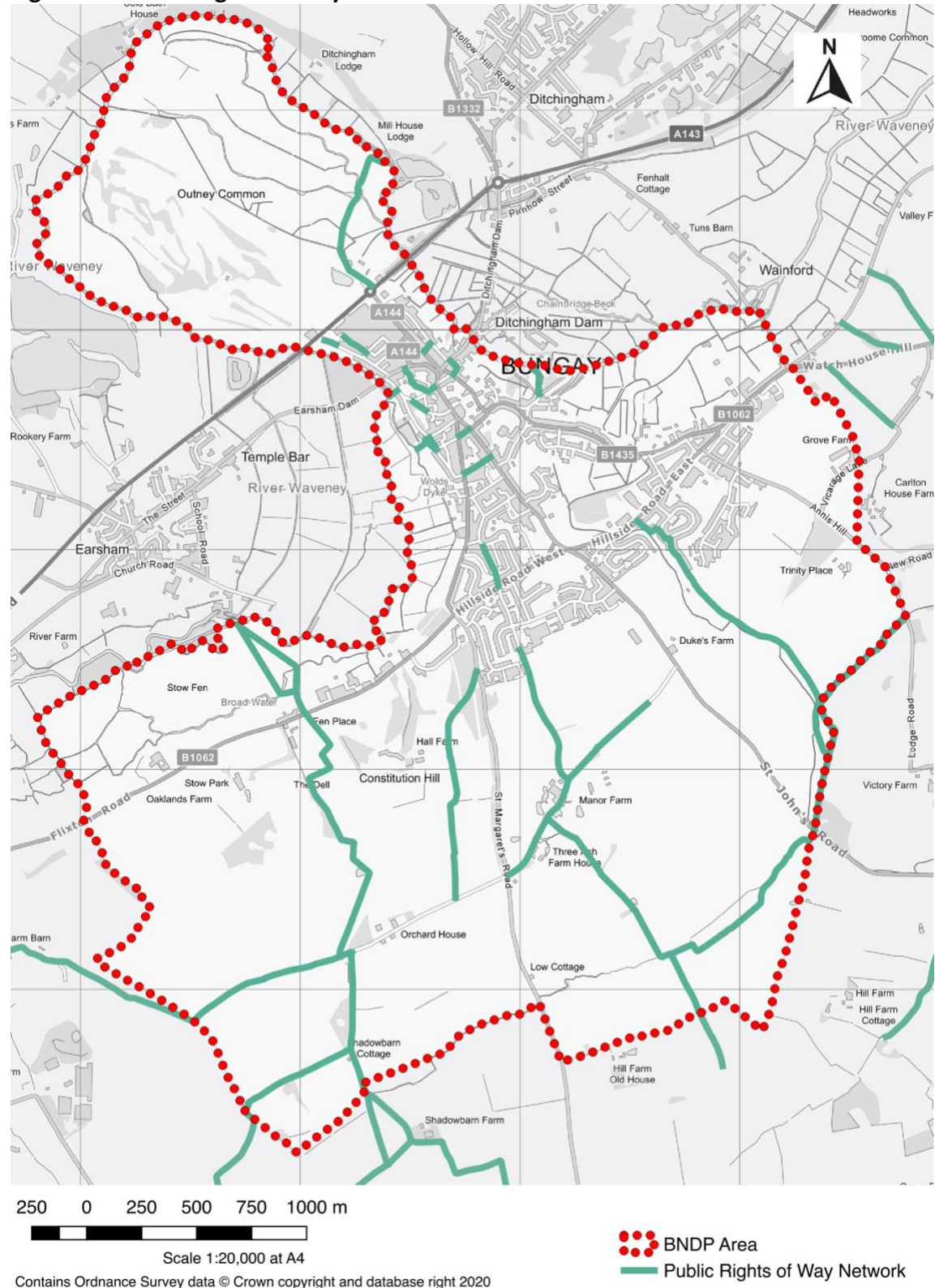
198. It is proposed that the SEA should include the following objective and assessment questions in relation to accessibility and transport.

Objective: To improve accessibility to services and facilities, particularly by sustainable travel options.

Assessment Questions (will the option or proposal help to):

- Support delivery of new services and facilities within the town?
- Enhance accessibility to a range of local services and facilities?
- Support retention of existing local services and facilities?
- Promote the use of active travel such as walking and cycling?
- Promote recreational activities involving walking and cycling, including access into the wider countryside?
- Address the impact on motorised transport through the town centre, including HGVs?

Figure 19: Public Rights of Way Network



Next Steps

199. The next stage for the SEA will involve exploring reasonable alternatives for the BNDP. The findings of this work will be fed back to the BNDP Steering Group so that they might be taken into consideration when finalising the Neighbourhood Plan. The draft BNDP will then be subject to appraisal, and the Environmental Report will be prepared for consultation alongside the Regulation 14 version of the BNDP.
200. Public involvement through consultation is a key element of the SEA process. At this scoping stage, the SEA Regulations require consultation with statutory environmental bodies. These include the Environment Agency, Historic England and Natural England.
201. This Scoping Report has been released to these three statutory consultees who are invited to comment on its content, particularly the evidence base, identified key issues and proposed SEA framework.
202. All comments received on the Scoping Report will be reviewed and will influence the development of the SEA where appropriate.

Appendix A: Proposed SEA Framework

The proposed SEA objectives and assessment questions for each of the themes explored in this Scoping Document are presented in the table below.

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

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

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