

# Strategic Environmental Assessment (SEA) for the Easton Neighbourhood Plan

**Environmental Report**

Easton Parish Council

August 2022

## Quality information

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## Table of Contents

<b>Non-Technical Summary .....</b>	<b>i</b>
1. Introduction .....	1
2. What is the plan seeking to achieve? .....	3
3. What is the scope of the SEA? .....	6
<b>Part 1: What has plan-making / SEA involved to this point? ...</b>	<b>13</b>
4. Introduction (to Part 1) .....	14
5. Establishing reasonable alternatives .....	15
6. Assessing the reasonable alternatives .....	18
7. Developing the preferred approach .....	27
<b>Part 2: What are the SEA findings at this stage? .....</b>	<b>28</b>
8. Introduction (to Part 2) .....	29
9. Assessment of the plan .....	31
10. Conclusions and recommendations .....	38
<b>Part 3: What are the next steps? .....</b>	<b>39</b>
11. Next steps .....	40
Appendix A Regulatory requirements .....	41
Appendix B Scoping information .....	46

# Non-Technical Summary (NTS)

## Introduction

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

The ENP is currently being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012, and in the context of the Suffolk Coastal Local Plan (adopted September 2020).

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the ENP is a legal requirement.<sup>1</sup>

This Non-Technical Summary (NTS) provides a summary for the full Environmental Report for the ENP. It is published alongside the 'pre-submission' version of the Plan, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended).

## Structure of the Environmental Report/ this NTS

SEA reporting essentially involves answering the following questions in turn:

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

Each of these questions is answered in turn within a discrete 'part' of the Environmental Report and summarised within this NTS. However, firstly there is a need to set the scene further by answering the questions 'What is the Plan seeking to achieve?' and 'What's the scope of the SEA?'.

## What is the Plan seeking to achieve?

The vision of the ENP is *"to have a thriving and vibrant community, accepting organic growth to its housing and population, whilst keeping its rural and historic character, its valued green spaces, natural environment, safe roads, and avoidance of light pollution for its natural dark skies"*. This vision will be upheld by:

- Ensuring that housing growth and population is organic and respects the environment and infrastructure to ensure that there is sustainable growth for the population.

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<sup>1</sup> Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations ('the SEA Regulations'). The CNP was subject to formal screening in 2020.

<sup>1</sup> Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

- Address the lack of affordable properties for young people and families and to aspire to making available smaller 2 to 3 bedroom dwelling to buy or rent.
- Ensuring that the village remains a vibrant and friendly community and that existing facilities and services are protected and opportunities for new facilities are taken.
- Respecting the strong rural and historic character of the village, and to be mindful of the important views which should be respected and preserved where possible.
- To ensure that the natural environment is protected and enhanced, and that important habitat and species is preserved and respected.
- Ensuring the safety of our roads and lanes, by addressing volume and speeding wherever possible.

## What is the scope of the SEA?

The scope of the SEA is reflected in a list of themes, objectives, and assessment questions, which, taken together indicate the parameters of the SEA and provide a methodological ‘framework’ for assessment. A summary framework is presented below.

SEA theme	SEA objective
<b>Biodiversity and geodiversity</b>	Protect and enhance biodiversity and geodiversity.
<b>Climate change</b>	Reduce the contribution to climate change made by activities within the neighbourhood area. Support the resilience of the neighbourhood area to the potential effects of climate change, including flooding.
<b>Landscape</b>	To protect and enhance the character and quality of the immediate and surrounding landscape and villagescape.
<b>Historic environment</b>	Protect, conserve, and enhance the historic environment within and surrounding the neighbourhood area.
<b>Land, soil, and water resources</b>	Ensure the efficient and effective use of land. Protect and enhance water quality and use and manage water resources in a sustainable manner.
<b>Community wellbeing</b>	Ensure growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.
<b>Transportation</b>	Promote sustainable transport use and reduce the need to travel.

## Plan-making/ SEA up to this point

An important element of the required SEA process involves assessing ‘reasonable alternatives’ in time to inform development of the draft proposals, and then publishing information on reasonable alternatives for consultation alongside the draft proposals.

As such, Part 1 of the Environmental Report explains how work was undertaken to develop and assess a ‘reasonable’ range of alternative approaches for the ENP.

Specifically, Part 1 of the report:

1. Explains the process of establishing the reasonable alternatives.
2. Presents the outcomes of assessing the reasonable alternatives; and
3. Explains reasons for developing a preferred approach, considering the assessment.

## Establishing the reasonable alternatives

Part 1 of the Environmental Report explores the available site options to establish reasonable alternatives to the preferred approach for housing development. The reasonable alternatives, Options 1, 2 and 3, are set out in the table below.

Reasonable Alternative	Site Reference	Site Description	Site Area (Ha)	Capacity (number of dwellings)
Option 1	516	Land adjacent to The Old Osiers, The Street	1.0	18
Option 2	739	Sanctuary Field, Pound Corner	1.6	33 (but 5 to 10 recommended) <sup>2</sup>
Option 3	738	Easton Farm Park, Pond Corner	4.6	Unknown <sup>3</sup>

## Assessing the reasonable alternatives

The full assessment of the options for housing are presented in Part 1 of the Environmental Report. The summary findings are presented overleaf.

<sup>2</sup> Whilst the site has capacity for 33 dwellings according to the 'Call for Sites' (2016), the SOA recommends that this is reduced to approximately 5 to 10 dwellings to take account of the housing need for the neighbourhood area.

<sup>3</sup> Whilst the site capacity is unknown, the relative size of this site would suggest that the residual housing need for the neighbourhood area could likely be met at this location.

## Summary findings

		Option 1 Site 516	Option 2 Site 739	Option 3 Site 738
Biodiversity and geodiversity	Significant effect?	No	No	No
	Rank	1	2	2
Climate change	Significant effect?	No	No	No
	Rank	1	2	2
Landscape	Significant effect?	Uncertain	No	No
	Rank	3	2	1
Historic environment	Significant effect?	No	Yes - negative	Yes - negative
	Rank	1	2	3
Land, soil and water resources	Significant effect?	No	No	No
	Rank	2	3	1
Community wellbeing	Significant effect?	Yes - positive	Yes - positive	Yes - positive
	Rank	2	3	1
Transportation	Significant effect?	Yes - negative	Yes - negative	Yes - negative
	Rank	=	=	=

Option 1 performs most favourably overall and is only ranked behind both Option 2 and 3 under the landscape SEA topic due to uncertainty surrounding several landscape constraints. However, Option 3 outperforms Option 1 for the land, soil and water resources and community wellbeing SEA topics as it is the only brownfield site and is recommended for mixed use development within the SOA.

All options are considered to lead to significant positive effects for community wellbeing, and significant negative effects for transportation. However, Options 2 and 3 are also considered likely to lead to significant negative effects for the historic environment due to their impact on the setting of Grade II listed buildings and / or the Easton Conservation Area. Despite this, all options perform relatively well overall, delivering the outlined housing need whilst having a relatively minimal impact on most SEA topics, except for the historic environment and transportation SEA topics.

## Developing the preferred approach

The ENP Steering Group's reason for developing the preferred approach considering the assessment is identified below:

*"The ENP recognised the challenge that meeting the housing figures imposed by the SCDLP would present. SCD increased the housing figures by an additional 10 outside the LP review consultation which increased the total during the period of the plan to 44.*

*Easton NP area has restrictions in relation to the Conservation Area and prime agricultural land beyond the settlement boundary. To find suitable deliverable sites for housing created a major challenge.*

*Easton NP steering committee appointed and contracted through Locality AECOM to produce a site assessment package. Many sites were analysed and detailed in the report. No fully suitable sites came forward for housing from the report. Easton NP steering committee decided to commission a master planning technical package to investigate further details with regard to the 2 amber sites.*

#### **Site 516 – Amber**

*The topography of this site is unfortunately elevated, however the impact could be mitigated by siting a green space area by way of a Pocket Park, to include extensive tree planting and wild meadow areas, and to incorporate a badly needed Play Area for the village. The housing would be screened by the Pocket Park, and this would mitigate the impact at the village gateway entrance. The site is within the 30mph speed limit and offers the possibility of pedestrian connection to that of the estate opposite to reach the village.*

#### **Site 739 – Amber**

*The route from the site to the centre of the village does not have designated footways, which is of concern to the County Highways officers given that the provision of a footway over such a long length could impact on the viability of the scale of development envisaged. Highways officers also considered it unlikely that adequate visibility in both directions could be provided given the 60mph speed limit and proximity to a bend/ junction. The steering committee researched the heritage and landscape impact implications, it was clear that the maximum impact in terms of visibility, change to views and character, and the setting of a Grade II listed dwelling could not be effectively mitigated. The site is not well related to the village and beyond the 30mph speed limit. Following the detailed consideration of this site, it was concluded that the inability to secure a suitable access, the difficulty of achieving a footway link to The Street and the potential for detrimental impact on adjoining heritage assets meant that it is not currently considered deliverable during the Neighbourhood Plan period.”*

## **Assessment findings at this stage**

Part 2 of the Environmental Report presents an assessment of the ENP as a whole. Assessment findings are presented as a series of narratives under the ‘SEA framework’ theme headings. The following overall conclusions are reached:

The appraisal considers that the only significant effects likely to arise in the implementation of the ENP are positive in nature and relate to the SEA theme of community wellbeing. This reflects the vision of the ENP to have a “*thriving and vibrant community*”, and the policies linked to housing – including ensuring delivered housing meets the needs of the community.

Minor positive effects are expected for the SEA themes of biodiversity and geodiversity and landscape, reflecting the importance the ENP places on the natural environment and design-led development, as well as the avoidance and mitigation measures provided by the spatial strategy and plan policies.



Neutral effects are concluded in relation to the SEA themes of climate change, historic environment, and transportation, reflecting the plan's avoidance and mitigation measures that ensure new development does not cause significant deviations from the baseline conditions recorded.

Minor negative effects are predicted in relation to the SEA theme of land, soil, and water resources. This is due to the potential loss of best and most versatile land (BMV) and a greenfield site allocation that cannot be mitigated for.

## Next steps

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

Assuming the examination leads to a favourable outcome, the ENP will then be subject to a referendum, organised by East Suffolk Council. If more than 50% of those who vote agree with the ENP, then it will be 'made'. Once 'made', the ENP will become part of the Development Plan for East Suffolk Council, covering the defined neighbourhood area.

# 1. Introduction

## Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Easton Neighbourhood Plan (ENP).
- 1.2 The ENP is currently being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012, and in the context of the Suffolk Coastal Local Plan (adopted September 2020).
- 1.3 SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the ENP is a legal requirement.<sup>4</sup>

## SEA explained

- 1.4 It is a requirement that SEA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on SEA.
- 1.5 In-line with the Regulations, a report (known as the Environmental Report) must be published for consultation alongside the draft plan that *“identifies, describes and evaluates”* the likely significant effects of implementing *“the plan, and reasonable alternatives”*.<sup>5</sup> The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.6 More specifically, the Report must answer the following three questions:
  4. What has plan-making / SEA involved up to this point?
    - including in relation to 'reasonable alternatives'.
  5. What are the SEA findings at this stage?
    - i.e., in relation to the draft plan.
  6. What happens next?

## This Environmental Report

- 1.7 This Environmental Report is published alongside the 'pre-submission' version of the ENP, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended).
- 1.8 This report answers questions 1, 2 and 3 in turn, to provide the required information. Each question is answered within a discrete 'part' of the report.

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<sup>4</sup> Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations ('the SEA Regulations'). The CNP was subject to formal screening in 2020.

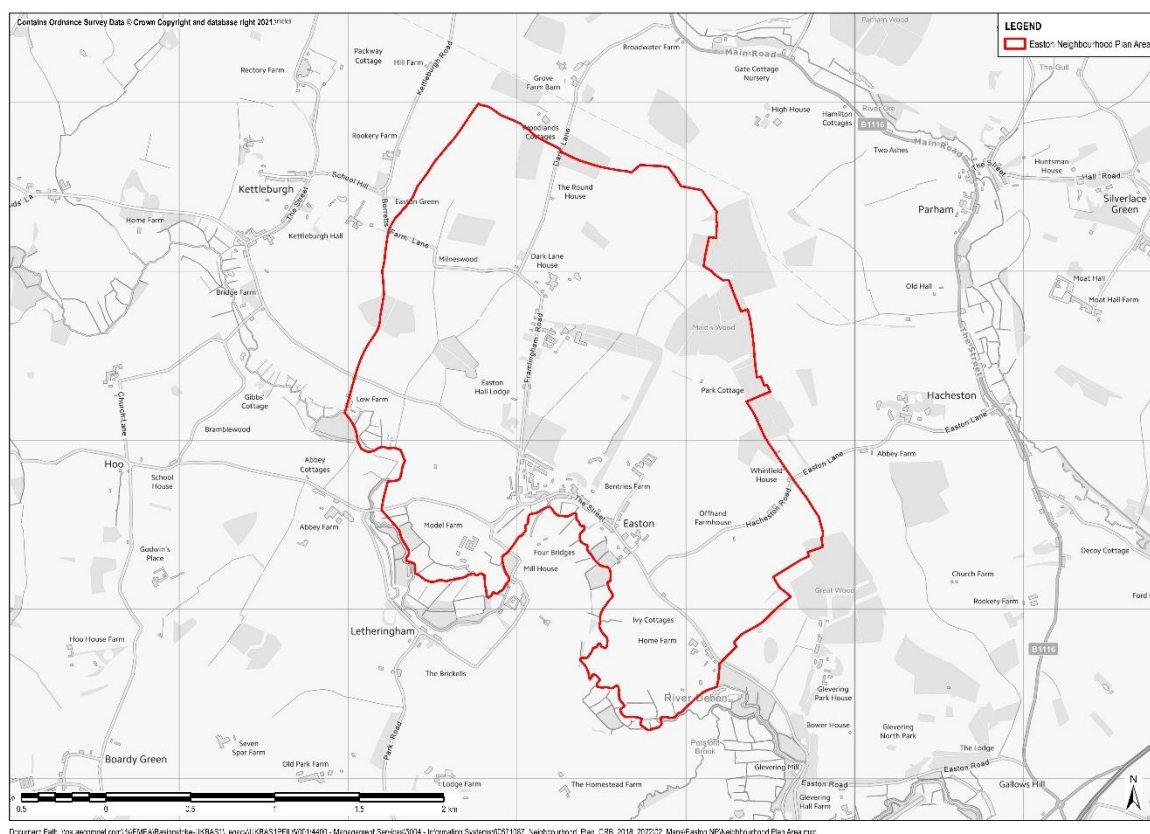
<sup>5</sup> Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

- 1.9 However, before answering question 1 (as presented within **paragraph 1.6**), two initial questions are answered to further set the scene; what is the plan seeking to achieve? And what is the scope of the SEA? This is presented in Chapter 2 and Chapter 3 of the Environmental Report, below.

## 2. What is the plan seeking to achieve?

### Introduction

- 2.1 This section considers the strategic planning policy context provided by the adopted Suffolk Coastal Local Plan and then presents the vision and objectives of the ENP. **Figure 2.1** below presents the neighbourhood area, which covers the civil parish of Easton (in East Suffolk).



**Figure 2.1 The neighbourhood area**

### Strategic planning policy context

- 2.2 East Suffolk Council's Suffolk Coastal Local Plan (hereafter referred to as the SCLP), adopted in September 2020, provides a vision for the communities of the former Suffolk Coastal area up to 2036 and recognises the diversity of the area.
- 2.3 Easton has a population of 375 people, according to 2020 population estimates, and is defined as a 'Small Village' in Policy SCLP3.2 (Settlement Hierarchy) of the SCLP. Small villages are identified due to their modest range of service provision, which will serve the needs of residents within the village. Development of new housing in such settlements can help to support existing local services as well as contributing towards the mix of housing available in these villages.
- 2.4 The SCLP identifies an indicative need for 44 new dwellings in Easton between 1st April 2018 and 2036. SCLP Table 3.5 (Anticipated housing growth by Town/Parish) identifies that as of the end of March 2018, 24 of these 44 new

dwelling had already gained planning permissions, leaving a residual requirement for a further 20 dwellings. However, between 1st April 2018 and 1st February 2021, a further nine dwellings have been granted planning permission, reducing the residual requirement to eleven new dwellings.

- 2.5 According to the SCLP, Easton Primary School is operating close to capacity and, considering this allocation along with forecasts, would be over capacity during the first five years of the plan period. Therefore, new development will be required to contribute through the Community Infrastructure Levy towards the provision of additional school places, as set out in the Infrastructure Delivery Framework. To address capacity issues, it will be necessary for the school site to be extended.
- 2.6 Neighbourhood plans will form part of the development plan for East Suffolk, alongside, but not as a replacement for, the Local Plan. Neighbourhood plans are required to be in general conformity with the Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in East Suffolk, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.

## Vision statement and objectives of the ENP

- 2.7 The vision of the ENP is *“to have a thriving and vibrant community, accepting organic growth to its housing and population, whilst keeping its rural and historic character, its valued green spaces, natural environment, safe roads, and avoidance of light pollution for its natural dark skies”*. This vision will be upheld by:
- Ensuring that housing growth and population is organic and respects the environment and infrastructure to ensure that there is sustainable growth for the population.
  - Address the lack of affordable properties for young people and families and to aspire to making available smaller 2 to 3 bedroom dwelling to buy or rent.
  - Ensuring that the village remains a vibrant and friendly community and that existing facilities and services are protected and opportunities for new facilities are taken.
  - Respecting the strong rural and historic character of the village, and to be mindful of the important views which should be respected and preserved where possible.
  - To ensure that the natural environment is protected and enhanced, and that important habitat and species is preserved and respected.
  - Ensuring the safety of our roads and lanes, by addressing volume and speeding wherever possible.
- 2.8 The objectives of the ENP have been developed to deliver the vision, and have been organised under the following four headings:

### Housing:

1. Ensure that Easton's housing growth is commensurate with the level of services and facilities in the village.
2. Deliver housing that is tailored to meet the needs of the community.

**Natural environment:**

3. Protect and enhance the landscape character of Easton including green spaces, woodland and watercourses.
4. Protect important views and links to the wider countryside.
5. Deliver net gains to the extent and quality of natural habitats.

**Historic environment and design:**

6. Conserve and enhance the village's heritage assets.
7. Ensure that new development is designed in a way that reflects local character.
8. Incorporate appropriate measures, to reduce the environmental impact of new development.

**Infrastructure and services:**

9. Minimise the impact of development on the capacity of essential infrastructure and services.
10. Protect and improve the range of existing community facilities and services.

## 3. What is the scope of the SEA?

### Introduction

- 3.1 The aim here is to introduce the reader to the scope of the SEA, i.e., the SEA topics and objectives that should be a focus of the assessment of the plan and reasonable alternatives. Further information is presented in **Appendix B**.

### Consultation

- 3.2 The SEA Regulations require that “*when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.<sup>6</sup> As such, these authorities were consulted in February 2022. No response was received from the Environment Agency. The responses received from Natural England and Historic England are detailed in **Table 3.1** below.

**Table 3.1 Scoping consultation responses**

Consultation response	How the response was considered and addressed
Environment Agency <i>No response received</i>	
No comments.	No response required.
Historic England Historic Places Adviser (email response received on 2 <sup>nd</sup> March 2022)	
We would refer you to the advice in Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment, which can be found <a href="#">here</a> . This advice sets out the historic environment factors which need to be considered during the Strategic Environmental Assessment or Sustainability Appraisal process, and our recommendations for information you should include.	The advice has been a useful source of evidence during the SEA process.
We would also refer you to Historic England Advice Note 3: Site Allocations and Local Plans. This advice note sets out what we consider to be a robust process for assessing the potential impact of site allocations on any relevant heritage assets. In particular we would highlight the Site Selection Methodology set out on Page 5. This is similar to the methodology used to assess potential impacts on the setting of heritage assets (Good Practice Advice 3) but is focused specifically on the site allocation process and is therefore a more appropriate methodology to employ in this context.	The advice has been a useful source of evidence during the SEA process.
We would expect a proportionate assessment based on this methodology to be undertaken for any site allocation where there was a potential impact, either positive or negative, on a heritage asset, and the SEA consequently to advise on how any harm should be	Potential impacts associated with the site allocations with respect to the Neighbourhood Plan proposals are discussed in further detail

<sup>6</sup> These consultation bodies were selected “by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes” (SEA Directive, Article 9(3)).

## Consultation response

## How the response was considered and addressed

minimised or mitigated. Advice Note 3 can be found [here](#).

within Part 1 and Part 2 of this Environment Report.

We are pleased to note the inclusion of local non-designated heritage assets as a specific part of the scope for this SEA. Please note that we normally recommend that the HER is directly consulted at Scoping Stage, rather than Heritage Gateway. Heritage Gateway is not as up to date, and may therefore not provide sufficiently useful evidence regarding the potential risks and impacts to the historic environment in order to inform the SEA process itself.

Comment noted.

Historic England strongly advises that the conservation and archaeological staff of the relevant local planning authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), which should be directly consulted as part of the SEA process. In addition, they will be able to advise how any site allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Comment noted.

To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that, despite the SEA, these would have an adverse effect upon the environment.

Comment noted.

Natural England

Lead Adviser (email response received on 18<sup>th</sup> February 2022)

### Biodiversity and Geodiversity

Natural England notes and welcomes the inclusion of considering the enhancement of not only protected habitats and species, but also the connections between them. Delivery of multifunctional green infrastructure networks will help in achieving this objective. We would also encourage you to consider how biodiversity net gain can be incorporated into the neighbourhood plan.

Comment noted. Biodiversity net gain is included in Policy ETN 6 (Biodiversity and Habitats) of the draft ENP.

Biodiversity Net Gain (BNG) is an approach to development on land or marine management activities that leaves the natural environment in a measurably better state than it was before. It is expected that BNG will become mandatory for most terrestrial and intertidal development in the second half of 2023. Considering BNG will help to align the Neighbourhood plan with the East Suffolk Council Local plan, as referenced in policy SCLP10.1. You may wish to refer to Technical Note 2 of the CIEEM guide which provides useful advice on how to incorporate biodiversity net gain into developments.



## Consultation response

## How the response was considered and addressed

### Climate Change

Comment noted.

Natural England notes and welcomes the objective to reduce the number of journeys made and to promote more sustainable forms of transport. We also welcome the consideration of green infrastructure to support adaptation to effects of climate change. Evidence and advice on green infrastructure can be found on the Natural England Green Infrastructure web pages. We also recommend the Green Infrastructure Partnership as a useful source of information when creating and enhancing GI.

### Land, Soil and Water Resources

Assessment question added to SEA framework below.

Natural England notes that the majority of the land within the plan area is classified at Grade 2 or Grade 3 land. We welcome the consideration given to avoid the loss of this land. There is a risk that in some situations, development on land of limited biodiversity value in its own right can lead to the creation of islands of biodiversity, permanently severed from other areas. We, therefore, suggest adding *“Ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced?”*

### Community Wellbeing

Assessment question added to SEA framework below.

In this section, you consider how the plan can facilitate enhancements of green infrastructure and improving access to open space. However, there are no questions relating to impacts on existing recreational assets (quality or extent). We suggest adding an additional question such as ‘Avoid impacts on the quality and extent of existing recreational assets, such as formal or informal footpaths?’.

In addition to the baseline statistics used in this section, you may wish to use Natural England’s accessible Natural Greenspace Standards (ANGST) which determines a baseline for access to natural green space.

As set out in Planning Practice Guidance, you should be monitoring the significant environmental effects of implementing the neighbourhood plan. This should include indicators for monitoring the effects of the plan on biodiversity (NPPF para 117).

Comment noted.

It is important that any monitoring indicators relate to the effects of the plan itself, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions.

Whilst it is not Natural England’s role to prescribe what indicators should be adopted, the following indicators may be appropriate.

Biodiversity:

## Consultation response

## How the response was considered and addressed

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- Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance.
- Percentage of major developments generating overall biodiversity enhancement.
- Hectares of biodiversity habitat delivered through strategic site allocations.

### Green infrastructure:

- Percentage of the neighbourhood area's population having access to a natural greenspace within 400 metres of their home.
  - Length of greenways constructed.
  - Hectares of accessible open space per 1000 population.
-

## The SEA framework

3.3 The SEA scope is summarised in a list of topics, objectives and assessment questions, known as the SEA framework. **Table 3.2** presents the SEA framework as consulted on in 2022. The SEA framework has been revisited and updated where appropriate to reflect the comments received at scoping consultation, as presented above in **Table 3.1**.

**Table 3.2 SEA framework**

SEA Objective	Assessment questions to consider for the allocations / proposals within the ENP
<b>Biodiversity and geodiversity</b>	
Protect and enhance biodiversity and geodiversity.	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> <li>• Support the integrity of the designated sites for biodiversity and geodiversity located within and within proximity to the neighbourhood area?</li> <li>• Protect and enhance priority habitats and species and the connections between them?</li> <li>• Achieve biodiversity and environmental net gains and support the delivery of ecosystem services and multifunctional green infrastructure networks?</li> <li>• Support the national habitat network, particularly Network Enhancement Zone 1 and areas of Restorable Habitat?</li> <li>• Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?</li> <li>• Support access to, interpretation and understanding of biodiversity and geodiversity?</li> </ul>
<b>Climate change</b>	
Reduce the contribution to climate change made by activities within the neighbourhood area.	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> <li>• Reduce the number of journeys made?</li> <li>• Promote the use of sustainable modes of transport including walking, cycling and public transport?</li> <li>• Increase the number of new developments meeting or exceeding sustainable design criteria?</li> <li>• Generate energy from low or zero carbon sources?</li> <li>• Reduce energy consumption from non-renewable resources?</li> <li>• Support proposals for EV charging infrastructure?</li> </ul>
Support the resilience of the neighbourhood area to the potential effects of climate change, including flooding.	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> <li>• Ensure that inappropriate development does not take place in areas at higher risk of flooding, considered the likely future effects of climate change?</li> <li>• Improve and extend green infrastructure networks in the neighbourhood area to support adaptation to the potential effects of climate change?</li> <li>• Sustainably manage water runoff and drainage?</li> <li>• Ensure the potential risks associated with climate change are considered through new development in the neighbourhood area?</li> <li>• Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?</li> </ul>

SEA Objective	Assessment questions to consider for the allocations / proposals within the ENP
<b>Landscape</b>	
To protect and enhance the character and quality of the immediate and surrounding landscape and villagescape.	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> <li>• Protect and/or enhance local landscape and villagescape character, key sensitivities, and quality of place?</li> <li>• Conserve and enhance local identity, diversity, and settlement character?</li> <li>• Protect visual amenity and locally important views in the neighbourhood area?</li> <li>• Retain and enhance landscape and villagescape features that contribute to the rural setting of the neighbourhood area?</li> </ul>
<b>Historic environment</b>	
Protect, conserve, and enhance the historic environment within and surrounding the neighbourhood area.	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> <li>• Conserve and enhance buildings, structures, and areas of architectural or historic interest, both designated and non-designated, and their settings?</li> <li>• Protect the integrity and the historic setting of key finds of cultural heritage interest as listed in the Suffolk HER?</li> <li>• Support the undertaking of early archaeological investigations and, where appropriate, recommend mitigation strategies?</li> </ul>
<b>Land, soil and water resources</b>	
Ensure the efficient and effective use of land.	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> <li>• Avoid the loss of high-quality agricultural land resources?</li> <li>• Promote any opportunities for the use of previously developed land, or vacant/underutilised land?</li> <li>• Protect the integrity of mineral resources?</li> <li>• Ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced?</li> </ul>
Protect and enhance water quality and use and manage water resources in a sustainable manner.	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> <li>• Avoid impacts on water quality?</li> <li>• Support improvements to water quality?</li> <li>• Ensure appropriate drainage and mitigation is delivered alongside development?</li> <li>• Protect waterbodies from pollution?</li> <li>• Maximise water efficiency and opportunities for water harvesting and/or water recycling?</li> </ul>
<b>Community wellbeing</b>	
Ensure growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> <li>• Provide everyone with the opportunity to live in good quality, affordable housing?</li> <li>• Support the provision of a range of house types and sizes?</li> <li>• Meet the needs of all sectors of the community?</li> <li>• Provide flexible and adaptable homes that meet people's needs, particularly the needs of an ageing population?</li> <li>• Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people?</li> </ul>

SEA Objective	Assessment questions to consider for the allocations / proposals within the ENP
and inclusive communities.	<ul style="list-style-type: none"> <li>• Encourage and promote social cohesion and active involvement of local people in community activities?</li> <li>• Facilitate green infrastructure enhancements, including improved access to open space?</li> <li>• Promote the use of sustainable building techniques, including use of sustainable building materials in construction?</li> <li>• Minimise fuel poverty?</li> <li>• Maintain or enhance the quality of life of existing residents?</li> <li>• Avoid impacts on the quality and extent of existing recreational assets, such as formal or informal footpaths?</li> </ul>

## Transportation

Promote sustainable transport use and reduce the need to travel.	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> <li>• Support the key objectives within the Suffolk Local Transport Plan to encourage more sustainable transport?</li> <li>• Encourage modal shift to more sustainable forms of travel and enable active travel enhancements?</li> <li>• Promote improved local connectivity and pedestrian and cyclist movement?</li> <li>• Facilitate working from home and remote working?</li> <li>• Improve road safety?</li> <li>• Reduce the impact on residents and the built environment from the road network?</li> </ul>
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## **Part 1: What has plan-making / SEA involved to this point?**

## 4. Introduction (to Part 1)

### Overview

- 4.1 Whilst work on the ENP has been underway for some time, the aim here is not to provide a comprehensive explanation of work to date, but rather to explain work undertaken to develop and appraise reasonable alternatives.
- 4.2 As the delivery of new housing development through the ENP is what is most likely to have a significant effect on SEA objectives, it was determined that this issue should be the primary focus of the consideration of alternatives through the SEA process. Case-law (most notably Friends of the Earth Vs. Welsh Ministers, 2015) has established that planning authorities may apply discretion and planning judgement when determining what should reasonably be the focus of alternatives appraisal, recognising the need to apply a proportionate approach and ensure an SEA process / report that is focused and accessible.
- 4.3 The potential sites and potential site options for the location of housing for delivering development in line with the ENP objectives, will directly or indirectly influence the topic areas identified above and the Parish Council's preferred approach.

### Structure of this part of the report

- 4.4 This part of the report is structured as follows:
  - **Chapter 5** – explains the process of establishing reasonable alternatives
  - **Chapter 6** – presents the outcomes of appraising reasonable alternatives
  - **Chapter 7** – explains reasons for selecting the preferred option

## 5. Establishing reasonable alternatives

### Introduction

- 5.1 The aim here is to explain the process that led to the establishment of alternative sites and thereby present “*an outline of the reasons for selecting the alternatives dealt with*”<sup>7</sup>.
- 5.2 Specifically, there is a need to explain the strategic parameters that have a bearing on the establishment of options (in relation to the level and distribution of growth) and the work that has been undertaken to date to examine site options (i.e., sites potentially in contention for allocation in the ENP). These parameters are then drawn together to arrive at ‘reasonable alternatives’.

### Strategic parameters

- 5.3 As discussed in **Section 2.1**, the ENP is being prepared in the context of the Suffolk Coastal Local Plan (SCLP). The SCLP identifies an indicative need for 44 new dwellings in Easton between 1st April 2018 and 2036. SCLP Table 3.5 (Anticipated housing growth by Town/ Parish) identifies that as of the end of March 2018, 24 of these 44 new dwellings had already gained planning permissions, leaving a residual requirement for a further 20 dwellings. However, between 1st April 2018 and 1st February 2021, a further 9 dwellings have been granted planning permission, reducing the residual requirement to 11 new dwellings.

### Initial shortlisting of site options

- 5.4 The site selection process was led by the Parish Council, with support from AECOM in 2018 through a ‘Site Options Assessment’ (SOA) technical support package<sup>8</sup>. A total of 22 sites were considered through the SOA, which were identified through the Suffolk Coastal Strategic Housing Land Availability Assessment (2014)<sup>9</sup> and the Issues and Options Consultation Document (2017)<sup>10</sup>, as well as the Easton Parish Survey which identified further sites.
- 5.5 The SOA found that three of the 22 sites were potentially appropriate for considerations for neighbourhood plan allocations (specifically for housing), providing that the identified site-specific constraints can be resolved or mitigated. In addition to this, one site was considered suitable for a mixed-use allocation, ideally for employment and / or tourism uses.
- 5.6 These four sites (and their size and capacity taken from the SOA) are set out in **Table 5.1** overleaf, alongside **Figure 5.1** which depicts the locations of these sites.

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<sup>7</sup> Schedule 2(8) of the SEA Regulations.

<sup>8</sup> AECOM (2018): ‘Easton Neighbourhood Plan Site Assessment Final Report’ (this report contributes to the evidence base for the emerging plan and will accompany the ENP at Regulation 14 consultation)

<sup>9</sup> Suffolk Coastal District Council (2014): ‘Strategic Housing Land Availability Assessment’, [online] available to access via [this link](#)

<sup>10</sup> Suffolk Coastal District Council (2017): ‘Issues and Options for the Suffolk Coastal Local Plan Review’, [online] available to access via [this link](#)



**Table 5.1 Sites suitable for allocation according to the SOA**

Site Reference	Site Description	Site Area (Ha)	Capacity (number of dwellings)
9	Land adjacent to The Round Cottage, Framlingham Road	0.2	1 to 2
516	Land adjacent to The Old Osiers, The Street	1.0	18
738	Easton Farm Park, Pond Corner	4.6	Unknown <sup>11</sup>
739	Sanctuary Field, Pound Corner	1.6	33 (but 5 to 10 recommended) <sup>12</sup>



**Figure 5.1 Location of sites suitable for allocation according to the SOA**

5.7 Of the remaining 18 sites, 16 were found to be unsuitable for development due to a lack of safe pedestrian access linking these sites to community facilities and services, with limited potential to create access. The remaining two sites were given potentially suitable ratings through the site assessment process, but they are no longer available (and therefore not reasonable) options to consider. Further information can be found within the site assessment final report.

## Establishing reasonable alternatives

5.8 In the context of the above, the four sites have been considered as reasonable options to take forward for further consideration through the SEA. However, as site 9 is within the existing settlement boundary and only has the capacity to deliver one to two dwellings, therefore it is likely to come forward as windfall

<sup>11</sup> Whilst the site capacity is unknown, the relative size of this site would suggest that the residual housing need for the neighbourhood area could likely be met at this location.

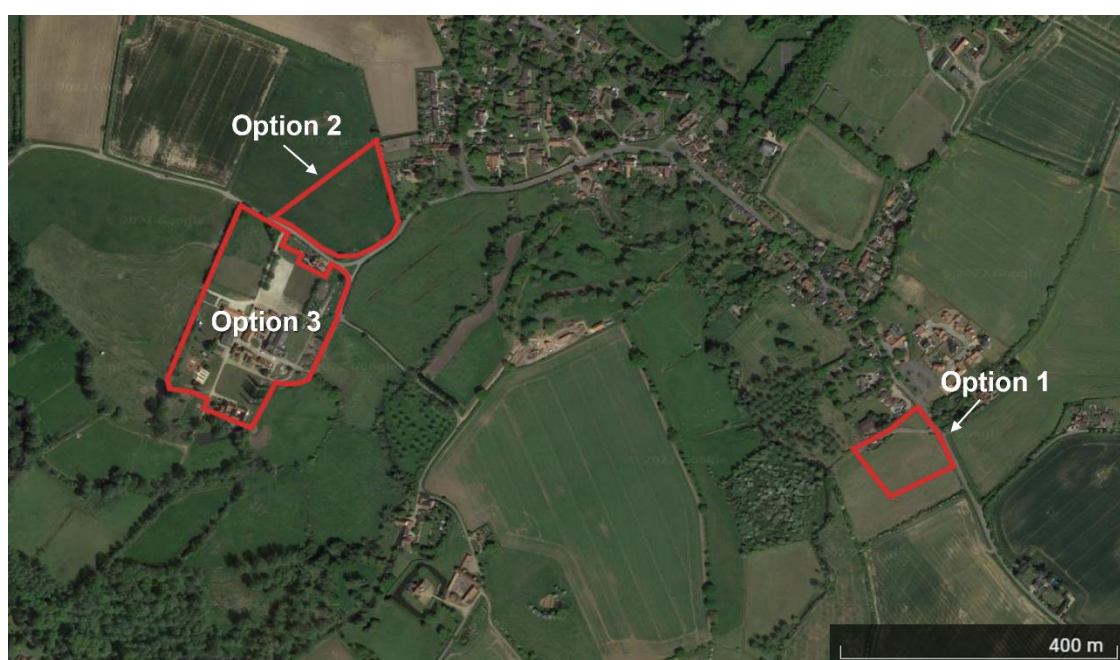
<sup>12</sup> Whilst the site has capacity for 33 dwellings according to the 'Call for Sites' (2016), the SOA recommends that this is reduced to approximately 5 to 10 dwellings to take account of the housing need for the neighbourhood area.

development providing this is delivered in line with the other policies within the ENP (as well as Local Plan requirements). Due to this and given that the ENP supports the delivery of dwellings at one large site (which will also support the delivery of affordable homes), site 9 has been ruled out of the SEA. The remaining three sites are potentially large enough to meet the local housing needs for the ENP and form the basis of the three options, which have been appraised as reasonable alternatives through the SEA. A discussion of the options is presented below.

- 5.9 Site 738 is disconnected from the existing settlement boundary and is dependent on site 739 coming forward to offer some form of connection. Nevertheless, as a large site on previously developed land, this site is a viable option for development, which is reflected by the green score it was given in the SOA. The SOA considers this site suitable for mixed-use development. Due to this, the number of dwellings this site could deliver is currently undetermined as it is dependent on whether this site is delivered as mixed-use development or residential development..
- 5.10 This leaves sites 516 and 739, which were given an amber score in the SOA due to having several constraints. Therefore, sites 516 (Option 1), 739 (Option 2) and 738 (Option 3) are established as the reasonable alternatives for the purposes of the SEA. In **Chapter 6** to follow, Options 1, 2 and 3 will be assessed against seven SEA topics to determine their suitability for development in terms of environmental considerations.

## 6. Assessing the reasonable alternatives

- 6.1 As outlined in the previous section, Options 1, 2 and 3 are established as potential site options for the location of housing for the purposes of the SEA. **Figure 6.1** below shows that locations of the three sites that make up these options.



**Figure 6.1 Sites being taken forward for assessment**

### Methodology

- 6.2 For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping (see **Table 3.1**) as a methodological framework. Green is used to indicate significant positive effects, whilst red is used to indicate significant negative effects. Where appropriate, neutral, or uncertain effects will also be noted. Uncertainty is noted with grey shading.
- 6.3 Every effort is made to predict effects accurately; however, where there is a need to rely on assumptions to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.
- 6.4 Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the option or options that are preferred from an SEA perspective, with 1 performing the best.

- 6.5 Finally, it is important to note that effects are predicted considering the criteria presented within Regulations.<sup>13</sup> So, for example, account is taken of the duration, frequency, and reversibility of effects.
- 6.6 **Tables 6.1 to 6.7** which follow provide a comparative analysis of the three options identified as alternatives, against each of the SEA themes established through scoping (see **Table 3.1**).

## Biodiversity and geodiversity

**Table 6.1 Biodiversity and geodiversity assessment**

### Biodiversity and geodiversity

	Option 1 Site 516	Option 2 Site 739	Option 3 Site 738
Significant effect?	No	No	No
Rank	1	2	2

- 6.7 None of the options are located close to an internationally or nationally designated site for biodiversity. Although all options fall within an Impact Risk Zone (IRZ) for a nearby SSSI, this is for residential / rural residential development of 50 units or more and will therefore not affect development at any option. This is given that the residual housing requirement for the neighbourhood area is only eleven dwellings. Therefore, the IRZ thresholds will not be exceeded.
- 6.8 In addition to this, none of the options contains a Biodiversity Action Plan (BAP) priority species. However, Options 2 is adjacent to floodplain grazing marsh on the opposite side of Sanctuary Bridge Road to the southeast, and Option 3 is surrounded by floodplain grazing marsh to the east, south and west. Similarly, Option 2 is located close to deciduous woodland to the west and floodplain grazing marsh to the southwest which borders the River Deben. It is anticipated that these habitats will be retained and potentially strengthened through new development areas, possibly via the inclusion of buffer zones or green infrastructure enhancements to protect the habitats from new development areas. However, this is dependent on the design of development.
- 6.9 Both Option 1 and 2 contain hedgerows which may have biodiversity value according to the SOA. However, the SOA also states that Options 2 and 3 are located close to known habitats for protected species. Nevertheless, data accessible via the MAGIC online interactive mapping tool<sup>14</sup> shows that the Lapwing, a priority species for Countryside Stewardship Targeting, is present across the entire neighbourhood area and the wider area. In addition to this, the SOA states that Options 2 and 3 are in an 'Area to be Protected from Development and Conservation'.
- 6.10 Due to the above information, Options 2 and 3 are ranked less favourably than Option 1 as they have the potential to disturb a nearby known habitat for protected species and are in an 'Area to be Protected from Development and Conservation'. However, no significant negative effects are considered likely as

<sup>13</sup> Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

<sup>14</sup> MAGIC online interactive mapping tool, available to access via [this link](#)



mitigation measures, which might come forward through biodiversity net gain, have the potential to ensure that the nearby habitat is protected.

## Climate change

**Table 6.2 Climate change assessment**

Climate change mitigation	Option 1 Site 516	Option 2 Site 739	Option 3 Site 738
Significant effect?	No	No	No
Rank	1	2	2
Climate change adaptation			
Significant effect?	No	No	No
Rank	1	2	2

- 6.11 With respect to climate change mitigation efforts, Option 1 is close to the existing services and facilities within Easton. Options 2 and 3 are further away from services and facilities within the neighbourhood area in comparison to Option 1. Nevertheless, as Easton is a small settlement, all options are within walking distance to existing services and facilities for most people. In this respect, the impacts on climate change from transport (associated with emissions from vehicles) are likely to be similar at all options. Moreover, residents are likely to drive further afield to access a greater variety of services and facilities as Easton has a limited offer. However, the scale of development likely to come forward through the ENP (11 dwellings) is not likely to significantly increase the levels of traffic within Easton.
- 6.12 All options are considered to provide similar opportunities for delivering climate change mitigation measures which support low-emission, resource and energy efficient, and resilient development, and this is most likely to be guided by the existing policy context and the proposed ENP policy framework.
- 6.13 Overall, Option 1 is ranked slightly more favourably than Options 2 and 3 in terms of climate change mitigation. Moreover, significant effects are considered likely for any options due to the small-scale nature of development proposed for the neighbourhood area.
- 6.14 In terms of climate change adaptation, a small section of the south-eastern boundary of Option 2 lies within Flood Zone 2 and 3, as does a small section in the south of Option 3. Whilst this presents significant risks to development, it is anticipated that the new development areas can be located within the parts of the sites which are outside of these flood risk zones. This is due to the relative size of the sites within Options 2 and 3 and the small-scale nature of development (i.e., 11 dwellings) which is likely to come forward at these locations. Additionally, it is anticipated that national and local policy provision will ensure that any new development areas are located away from the most sensitive areas. Moreover, the masterplanning stage of development can ensure that the proposed dwellings are positioned in the most suitable locations, as to avoid this area of flood risk. In addition to this, open space can be appropriately positioned to mitigate flood risk on both sites.

- 6.15 In terms of surface water flood risk, parts of Options 1, 2 and 3 are at risk of flooding. However, this is along one boundary for all options, and therefore, it is unlikely to significantly impede development at these sites, especially if Sustainable Drainage Systems (SuDS) are incorporated into the sites' design. Nevertheless, Option 3 appears to be at a slightly higher risk of surface water flooding as both its eastern and southern boundaries border areas at risk.
- 6.16 Overall, Option 1 is ranked slightly more favourably than Options 2 and 3 in terms of climate change adaptation as it is not at risk of fluvial flooding. However, no significant negative effects are considered likely for Options 2 and 3, despite the sites covering areas of flood risk, as the constraints associated with these sites can be overcome through policy guidance and masterplanning.

## Landscape

**Table 6.3 Landscape assessment**

### Landscape

	Option 1 <i>Site 516</i>	Option 2 <i>Site 739</i>	Option 3 <i>Site 738</i>
Significant effect?	Uncertain	No	No
Rank	3	2	1

- 6.17 All options have several landscape constraints, which are as follows:

- Option 1 is exposed to open countryside on most sides and does not relate well to the existing development or neighbouring uses. There is a degree of screening from surrounding uses, but as the site is elevated from the road, this is limited. Option 1 is also located on the edge of the existing settlement, and as such, development here would extend the ribbon nature of Easton. However, the proposed housing number for Easton (11 dwellings) is less likely to significantly extend the ribbon pattern of Easton. Nevertheless, the site is sensitive from a landscape perspective given the reasons which have been discussed, and additional ribbon development in any capacity has the potential to extend the settlement boundary and increase visibility of the settlement from surrounding areas.
- Option 2 is partially adjacent to the existing settlement boundary, however, this site is part of a Special Landscape Area according to the SOA. In this respect, development at this option will need to be sympathetic to the surrounding landscape, which could be achieved through the appropriate positioning and height of dwellings, and the use of suitable materials.
- Option 3 is separate from the existing settlement boundary, however, as a brownfield site with existing buildings, it relates well to existing surrounding land uses and new development at this location has the potential to improve the character of the site itself through sensitive and sympathetic redevelopment. In addition to this, it is well screened from the surrounding area by hedgerows and several trees along much of the site boundary.

- 6.18 Option 3 is ranked most favourably overall, despite being disconnected from the existing settlement boundary, as it is the only brownfield site. Option 1 is ranked less favourably than Option 2 as development at this site will have a greater impact on the surrounding landscape. Nevertheless, significant

negative effects are not considered likely for Option 1 as there is potential to mitigate this site's impact on the surrounding landscape through an appropriate number of dwellings and improvements to site screening. However, uncertainty is still noted for Option 1 regarding these constraints.

## Historic environment

**Table 6.4 Historic environment assessment**

**Historic environment**

	<b>Option 1</b> <i>Site 516</i>	<b>Option 2</b> <i>Site 739</i>	<b>Option 3</b> <i>Site 738</i>
<b>Significant effect?</b>	<b>No</b>	<b>Yes - negative</b>	<b>Yes - negative</b>
<b>Rank</b>	<b>1</b>	<b>2</b>	<b>3</b>

6.19 All options have several constraints regarding the historic environment, which are as follows:

- Option 1 is located close to Grade II listed building 'Verandah Cottages', located approximately 70 metres northeast of the site. However, this listed building is relatively well screened by trees, and there is potential to plant further trees on the proposed site to strengthen screening.
- Option 2 is adjacent to a Grade II listed building, 'The Round House', located to the northeast of the site. There are some views from the site to the listed building, although the southern corner of the site is well screened. Option 2 is also adjacent to Easton Conservation Area to the northeast.
- Option 3 contains three Grade II listed buildings in the south of the site, which are: Loose boxes 80 metres north east of Dairy Easton Farm Park, Barn 90 metres north east of Dairy Easton Farm Park, and Cowshed laundry and dairy range at Easton Park Farm. These buildings would need to be retained if this site were to be developed. Moreover, consultation with Historic England is likely to be required to ensure the sensitive redevelopment of this site, including the retention of these nationally important heritage assets.

6.20 Considering the above, Option 3 is ranked least favourably, followed by Option 2 as it is more constrained than Option 1. Significant negative effects are deemed likely for Options 2 and 3 as development at these sites will likely impact the setting of listed buildings and / or the conservation area. Nevertheless, there is potential to mitigate this impact by ensuring dwellings are positioned away from these historic assets and are sympathetic in design. Specifically, regeneration of Option 3 has the potential to better reveal the special characteristics and significance of the listed buildings providing that high-quality and sensitive design is incorporated into the scheme. However, compared to the other options, it remains the least favourable from a heritage perspective.

## Land, soil and water resources

**Table 6.5 Land, soil and water resources assessment**

**Land, soil and water  
resources**

	<b>Option 1</b> <i>Site 516</i>	<b>Option 2</b> <i>Site 739</i>	<b>Option 3</b> <i>Site 738</i>
<b>Significant effect?</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Rank</b>	<b>2</b>	<b>3</b>	<b>1</b>

- 6.21 Option 3 is the only brownfield site, and in this respect, it is more favourable than Options 1 and 2 as it will not result in the loss of greenfield land.
- 6.22 In terms of the Agricultural Land Classification (ALC) assessment for the Eastern region<sup>15</sup>, the land at Option 1 is classed as poor (Grade 4), whereas the land at Option 2 is classed as good to moderate (Grade 3). The land at Option 3 is classed as good to moderate (Grade 3) in the northern half of the site and poor (Grade 4) in the southern half of the site. However, it is worth noting that Options 2 and 3 are not currently used for agricultural purposes.
- 6.23 Similarly, the Best and Most Versatile (BMV) agricultural land assessment for the Eastern region<sup>16</sup> indicates that Option 1 has a low likelihood of being underlain by BMV land (less than 20% area), whereas Option 2 has a high likelihood of being underlain by BMV land (over 60% area). Option 3 has a high likelihood of being underlain by BMV land (over 60% area) in the northern half of the site and a low likelihood of being underlain by BMV land (less than 20% area) in the southern half of the site.
- 6.24 Powerlines run across Option 2, which reduces the developable area of the site. Whilst the powerlines reduce the developable area of the site, this is not considered a significant constraint for development in the context of the level of development which is needed to meet local housing requirements.
- 6.25 In terms of water resources, all options are within a Nitrate Vulnerable Zone (NVZ) and Source Protection Zone (SPZ) (Zone III – Total Catchment), as is the entire neighbourhood area. Considering the large-scale nature of these designations, the small-scale development proposed within the neighbourhood area is unlikely to significantly impact the designations.
- 6.26 The River Deben runs through the neighbourhood area, and Option 1 is located closest to the river, approximately 50 metres away. Nevertheless, it will be important that development at all three options includes the provision of detailed water management strategies to ensure that local water resources are not subject to point source and / or diffuse pollution.
- 6.27 Overall, Option 3 is ranked most favourably as it is the only brownfield site. Option 2 is ranked slightly less favourably than Option 1 as it will result in the

<sup>15</sup> Natural England (2010): 'Agricultural Land Classification map Eastern Region (ALC008)', [online] available to access via [this link](#)

<sup>16</sup> Natural England (2017): 'Likelihood of Best and Most Versatile (BMV) Agricultural Land – Strategic scale map Eastern Region (ALC020)', [online] available to access via [this link](#)



loss of productive agricultural land. However, no significant negative effects are considered likely for Option 2 as the land is not used for agricultural purposes.

## Community wellbeing

**Table 6.6 Community wellbeing assessment**

### Community wellbeing

	<b>Option 1</b> <i>Site 516</i>	<b>Option 2</b> <i>Site 739</i>	<b>Option 3</b> <i>Site 738</i>
<b>Significant effect?</b>	<b>Yes - positive</b>	<b>Yes - positive</b>	<b>Yes - positive</b>
<b>Rank</b>	<b>2</b>	<b>3</b>	<b>1</b>

- 6.28 All options are considered likely to lead to significant positive effects for community wellbeing through their contribution to meeting the identified residual housing needs, as well as affordable housing needs. Option 1 can deliver up to 18 dwellings, and Option 2 up to 33, although the SOA only proposes 5 to 10 dwellings in line with Easton's residual housing requirement. At present, it is undetermined how many dwellings Option 3 can deliver. However, as the largest site, it is likely that alongside the other two options, it will meet the affordable housing threshold as set out in the ENP (Policy SCLP5.10 requires sites with capacity for ten dwellings or more to make provision for one in three units to be affordable dwellings).
- 6.29 Option 1 is close to existing services and facilities within Easton. Conversely, Options 2 and 3 are not near health and leisure facilities, although they are close to education facilities. Option 3 is deemed suitable for mixed use development according to the SOA, with the potential to deliver housing alongside a mix of employment and tourism uses. Due to this, Option 3 is ranked most favourably. Option 1 is ranked slightly more favourably than Option 2 due to its proximity to services and facilities, but significant positive effects are considered likely for both options as they meet housing needs, including affordable housing needs.

## Transportation

**Table 6.7 Transportation assessment**

### Transportation

	<b>Option 1</b> <i>Site 516</i>	<b>Option 2</b> <i>Site 739</i>	<b>Option 3</b> <i>Site 738</i>
<b>Significant effect?</b>	<b>Yes - negative</b>	<b>Yes - negative</b>	<b>Yes - negative</b>
<b>Rank</b>	<b>=</b>	<b>=</b>	<b>=</b>

- 6.30 All options will lead to an increase in private car use on the local road network given the relatively isolated nature of the neighbourhood area, and therefore minor negative effects can be anticipated for transportation. However, the scale of development likely to come forward through all options is not likely to significantly increase traffic on the local road network.
- 6.31 Options 1 and 2 involve settlement edge development, and whilst further from the centre, they are still accessible to existing services and facilities by foot for most people. Option 3 is separate from the existing settlement boundary; however, the SOA recommends this site for mixed use development, and if this includes employment uses, some residents (both within the site and neighbourhood areas as a whole) may not need to travel via private car to get to their place of work. Nevertheless, it is recognised that Easton has limited services and facilities, and as such, it is likely that residents will need to travel further afield under all three options.
- 6.32 Option 1 has existing suitable vehicular access, however the pedestrian route from the site to the centre of Easton is fragmented with no safe access at certain points along the route. This would need considerable upgrading if this site were to be developed. A similar issue is faced by Options 2 and 3, and as such, all options have been ranked equally and significant negative effects are considered likely for all options due to this key transportation constraint (unless it can be overcome in development).

## Summary findings

6.33 **Table 6.8** below summarises the findings of the assessment.

**Table 6.8 Summary of the findings of the assessment**

### Summary findings

		Option 1 Site 516	Option 2 Site 739	Option 3 Site 738
Biodiversity and geodiversity	Significant effect?	No	No	No
	Rank	1	2	2
Climate change	Significant effect?	No	No	No
	Rank	1	2	2
Landscape	Significant effect?	Uncertain	No	No
	Rank	3	2	1
Historic environment	Significant effect?	No	Yes - negative	Yes - negative
	Rank	1	2	3
Land, soil and water resources	Significant effect?	No	No	No
	Rank	2	3	1
Community wellbeing	Significant effect?	Yes - positive	Yes - positive	Yes - positive
	Rank	2	3	1
Transportation	Significant effect?	Yes - negative	Yes - negative	Yes - negative
	Rank	=	=	=

6.34 As shown in **Table 6.8** above, Option 1 performs most favourably overall, and is only ranked behind both Option 2 and 3 under the landscape SEA topic due to uncertainty surrounding several landscape constraints. However, Option 3 outperforms Option 1 for the land, soil and water resources and community wellbeing SEA topics as it is the only brownfield site and is recommended for mixed use development within the SOA.

6.35 All options are considered to lead to significant positive effects for community wellbeing, and significant negative effects for transportation. However, Options 2 and 3 are also considered likely to lead to significant negative effects for the historic environment due to their impact on the setting of Grade II listed buildings and / or the Easton Conservation Area. Despite this, all options perform relatively well overall, delivering the outlined housing need whilst having a relatively minimal impact on most SEA topics, except for the historic environment and transportation SEA topics.

## 7. Developing the preferred approach

### 7.1 The ENP Steering Group's reason for developing the preferred approach considering the assessment is identified below:

*"The ENP recognised the challenge that meeting the housing figures imposed by the SCDLP would present. SCD increased the housing figures by an additional 10 outside the LP review consultation which increased the total during the period of the plan to 44.*

*Easton NP area has restrictions in relation to the Conservation Area and prime agricultural land beyond the settlement boundary. To find suitable deliverable sites for housing created a major challenge.*

*Easton NP steering committee appointed and contracted through Locality AECOM to produce a site assessment package. Many sites were analysed and detailed in the report. No fully suitable sites came forward for housing from the report. Easton NP steering committee decided to commission a master planning technical package to investigate further details with regard to the 2 amber sites.*

#### *Site 516 – Amber*

*The topography of this site is unfortunately elevated, however the impact could be mitigated by siting a green space area by way of a Pocket Park, to include extensive tree planting and wild meadow areas, and to incorporate a badly needed Play Area for the village. The housing would be screened by the Pocket Park, and this would mitigate the impact at the village gateway entrance. The site is within the 30mph speed limit and offers the possibility of pedestrian connection to that of the estate opposite to reach the village.*

#### *Site 739 – Amber*

*The route from the site to the centre of the village does not have designated footways, which is of concern to the County Highways officers given that the provision of a footway over such a long length could impact on the viability of the scale of development envisaged. Highways officers also considered it unlikely that adequate visibility in both directions could be provided given the 60mph speed limit and proximity to a bend/ junction. The steering committee researched the heritage and landscape impact implications, it was clear that the maximum impact in terms of visibility, change to views and character, and the setting of a Grade II listed dwelling could not be effectively mitigated. The site is not well related to the village and beyond the 30mph speed limit. Following the detailed consideration of this site, it was concluded that the inability to secure a suitable access, the difficulty of achieving a footway link to The Street and the potential for detrimental impact on adjoining heritage assets meant that it is not currently considered deliverable during the Neighbourhood Plan period."*

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

## 8. Introduction (to Part 2)

8.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current 'pre-submission' version of the ENP. This chapter presents:

- An appraisal of the current version of the ENP under the seven SEA topic headings; and
- The overall conclusions at this current stage and recommendations for the next stage of plan-making.

### ENP policies

8.2 The pre-submission version of the ENP puts forward ten policies to guide development in the neighbourhood area and this includes one site allocation policy (ETN3). **Table 5.1** groups the drafted policies under the five broad themes as set out within the ENP.

**Table 5.1 ENP policies**

Reference	Policy Name
<b>Planning Strategy</b>	
ETN1	Spatial Strategy
<b>Housing</b>	
ETN2	Housing Development
ETN3	Land south-west of Wickham Market Road
<b>Natural Environment</b>	
ETN4	Protection of Important Views and Landscape Character
ETN5	Recreational Disturbance Avoidance and Mitigation
ETN6	Biodiversity and Habitats
ETN7	Local Green Spaces
<b>Historic Environment and Design</b>	
ETN8	Non-Designated Heritage Assets
ETN9	Design Considerations
<b>Infrastructure and Services</b>	
ETN10	Village Services and Facilities

## Methodology

- 8.3 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.2**) as a methodological framework.
- 8.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.
- 8.5 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Neighbourhood Plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the assessment as appropriate.

## 9. Assessment of the plan

### Plan contents, aims and objectives

- 9.1 A key aim of the Easton Neighbourhood Plan (ENP) is to identify land to deliver the forecasted housing need over the plan period. The East Suffolk Council's Suffolk Coastal Local Plan (SCLP) identifies an indicative need for 44 new dwellings in Easton for the period 2018-2036. Through already gained planning permissions, there is a residual requirement of 11 new dwellings. A key aim of the ENP is to involve the community of Easton in identifying where future development should be allowed to take place over the plan period.
- 9.2 The ENP policies ETN1 to ETN3 identify the spatial strategy of the plan, which involves an allocation on the land south-west of Wickham Market Road (ETN3) for 12 new dwellings. The site is located on the edge of the existing settlement.
- 9.3 Policy ETN1 – Spatial Strategy outlines the focus for and accommodation of development in the neighbourhood area.
- 9.4 Policy ETN2 – Housing Development outlines how the residual housing requirement will be met and how disused agricultural buildings can play a part in the housing allocations.
- 9.5 Policy ETN3 – Land south-west of Wickham Market Road allocates the site to be brought forward for housing development, outlining the benefits it will potentially deliver within the neighbourhood area.
- 9.6 Additionally, ENP policy ENT3 seeks to guide housing mix in line with SCLP Policy 5.8 (unless there is a need for a different mix), which states *“new development should provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location, reflecting where feasible the identified need, particularly focusing on smaller dwellings”*. Furthermore, ENP policy ETN9 highlights the need for new development proposals to reflect the local characteristics and circumstances in the ENP area and that they must create and contribute to a high quality, safe and sustainable environment.
- 9.7 Moreover, another key aim of the ENP is to identify the important natural and historic features that should be protected. The following policies in the ENP work towards this protection:
  - ETN4 – Protection of Important Views and Landscape Character provides for the protection and enhancement of important views, landscape character, heritage and rural character of the neighbourhood area.
  - ETN5 – Recreational Disturbance Avoidance and Mitigation outlines the requirement to make financial contributions towards mitigation measures to avoid adverse effects on European sites.
  - ETN6 – Biodiversity and Habitats outlines the expectation for proposals to retain existing features of biodiversity value and provide net gain that is proportionate to the scale and nature of the proposal.
  - ETN7 – Local Green Spaces designates six local green spaces.



- ETN8 – Non-Designated Heritage Assets ensures the retention and protection of named historic environment assets.
- Additionally, ETN9 – Design Considerations ensures proposals for new development reflects the local characteristics and circumstances within the neighbourhood area, and further ensures proposals contribute to the environment in a positive way.
- Finally, ETN10 – Village Services and Facilities lists several services and facilities, highlighting that development that enhances them will be supported where there is no adverse effect on the natural and historic environment.

9.8 The assessment is presented below under seven topic headings, reflecting the established assessment framework (see **Section 3**). A final section (**Chapter 10**) then presents overall conclusions.

## Biodiversity and geodiversity

9.9 Growth in the neighbourhood area is not constrained by designated sites as there are no Ramsar sites, Special Protection Areas (SPAs), Special Areas of Conservation (SACS) or Sites of Special Scientific Interest (SSSIs) within or within proximity to the ENP area. Additionally, the parish does not overlap with SSSI Impact Risk Zones (IRZs) for the type of development to be brought forward through the ENP, in particular the residential development proposed through policy ETN3.

9.10 Although Areas of Outstanding Natural Beauty (AONBs) are primarily landscape designations, the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) is located approximately 6km southeast of the ENP area, the ENP does fall into the identified Zone of Influence (ZOI) for the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). The ZOI indicates areas from which residents will likely travel to visit the coast, thus causing recreational disturbance and biodiversity impacts. A contribution towards mitigation by the developer is required in this instance – for smaller scale development (less than 50 dwellings) this a financial contribution to the RAMS. For sites of more than 50 dwellings, or sites in sensitive locations, a bespoke approach including a financial contribution and a demonstration of on-site and/or off-site mitigation measures may be required<sup>17</sup>.

9.11 There are no Biodiversity Action Plan (BAP) Priority Habitats on the proposed site included in Policy ETN3, however there are areas of deciduous woodland and coastal and floodplain grazing marsh located in proximity to the west and north and the neighbourhood area has additional areas of good quality semi-improved grassland, lowland meadows, and traditional orchards. The ENP could make reference to these BAP habitat areas and work to ensure no loss or damage occurs to them, as well as enhance and connect them through landscape-led design and green infrastructure. The Living England Habitat Map identifies that the site included in policy ETN3 is likely to support acid, calcareous and/or neutral grassland and dwarf shrub heath; the wider ENP area is also likely to support arable and horticultural land, broadleaved, mixed and yew woodland, built-up areas and gardens and coniferous woodland. The site included in ETN3 is not identified as part of any National Habitat Network

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<sup>17</sup> East Suffolk Council (2022) 'Habitat mitigation (RAMS)' can be accessed [here](#).

enhancement or expansion zones, however the eastern part of the parish is covered by Network Enhancement Zone 1 and Network Enhancement Zone 2.

- 9.12 All development proposals (with or without the ENP) are now expected to deliver demonstrable 10% net gains in biodiversity in support of nature recovery (in line with the Environment Act 2021). However, the ENP could promote a greater amount of net gain - policy ETN6 requires development proposals to retain existing features of biodiversity value, and states that biodiversity net gain should be proportionate to the scale and nature of the proposal. This could be achieved by working with guidance contained in the East Suffolk Environmental Guidance Note (2020)<sup>18</sup>, which suggests forming wildlife corridors and planting appropriate native species on development sites to support wildlife. Additionally, ENP policy ETN5 outlines the need for development to contribute towards mitigation measures through the Suffolk Recreational Disturbance Avoidance and Mitigation Strategy (RAMS).
- 9.13 Overall, with no deviations from the baseline anticipated and the opportunity to enhance biodiversity and geodiversity, **minor positive effects** are deemed most likely for this theme.

## Climate change

- 9.14 Fluvial flood risk is not a significant constraint, as the proposed site under ENP policy ETN3 is located within Flood Zone 1. The northern site boundary is located next to a tributary of the River Deben and is at partial risk of surface water flooding, however this is unlikely to impede development. ENP policy ETN9 states that development proposals will be supported where surface flooding is not created or added to; additionally, policy ETN3 states sustainable drainage systems (SUDS) will be implemented through development at the proposed site.
- 9.15 There are limited safe pedestrian routes throughout Easton and no local transport options. Therefore, it is likely private vehicular use in Easton will continue and increase in the future, causing increases in the absolute emission contributions for the Easton neighbourhood area. However, given the level of development likely to come forward during the plan period is small scale, this is not likely to be significant in the wider context. Additionally, the proposed site under policy ETN3 is located close to existing services and facilities within Easton. Policy ETN9 states proposals will be supported where one electric vehicle charging point per new off-street parking place created is provided, encouraging sustainable transportation.
- 9.16 The proposed site under policy ETN3 could deliver climate change mitigation measures which support low-emission, resource, and energy efficient, and resilient development, and this is most likely to be guided by the existing policy context and the proposed ENP policy framework.
- 9.17 The ENP is strongly design focused and does not contain proposals that significantly influence climate mitigation and carbon neutral targets. As the level of growth within the neighbourhood area is set by the SCLP, there are limited opportunities for measurable changes in terms of per capita emissions. However, Policy ETN9 states that development proposals should demonstrate

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<sup>18</sup> East Suffolk Council (2020) 'Environment Guidance Note' can be accessed [here](#).

how they satisfy the requirements of the Easton Development Design Principles. This includes reviewing development proposals against flood zones and addressing flood risks where necessary. Furthermore, the policy ETN9 states development proposals should be in line with the National Model Design Code, which states:

- A network of green spaces and green infrastructure should be created to provide multiple benefits, including climate change resilience.
- Designing streets to consider potential future climate change impacts.
- Designing places and buildings to respond to climate change through being energy efficient and minimising carbon emissions, through reducing greenhouse gas emissions, minimising embodied energy, and adapting to climate risks like rising temperature and increased flood risk; and
- Designing places and buildings to contribute to the efficient use of water.

9.18 As there is little to no deviation from the baseline, **broadly neutral effects** are considered most likely in relation to this theme.

## Landscape

9.19 Although the Suffolk Coast and Heaths AONB is located approximately 6km southeast of the ENP area, the ENP does fall into the identified zone from which residents will likely travel to visit the coast – as such, it is expected recreational disturbance and landscape impacts can originate here and a contribution towards mitigation is required<sup>19</sup>.

9.20 The ENP is located within the 83 South Norfolk and High Suffolk Claylands National Character Area (NCA) and two landscape character areas identified in the Suffolk Coastal Landscape Character Assessment 2018 - Easton and Glevering Estate Claylands and the Deben Valley. These landscapes have associated sensitivities, like increased development in and around traditional centres and pressure on the transport network.

9.21 Additionally, there are Tree Preservation Orders (TPOs) and local green spaces within the ENP area. These make important contributions to the character and setting of the built environment in Easton and should be maintained and enhanced where possible. Policy ETN6 states existing features of biodiversity value should be retained, including trees. Policy ETN7 allocates six local green spaces, which support access to nature for the community and allow connectivity between green infrastructure.

9.22 Policy ETN1 in the ENP outlines landscape protection in the spatial strategy, stating development proposals will only be permitted where they will not have an unacceptable impact on the landscape. Additionally, ENP policy ETN4 outlines the importance of landscape for the neighbourhood area and development should regard, conserve, and enhance landscape character and key views. Furthermore, ENP policy ETN5 outlines the need to financially contribute towards mitigation measures through the Suffolk Recreational Disturbance Avoidance and Mitigation Strategy.

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<sup>19</sup> East Suffolk Council (2022) 'Habitat mitigation (RAMS)' can be accessed [here](#).

- 9.23 The ENP is strongly design focused. Policy ETN3 outlines specific requirements to mitigate any landscape and visual impact concerns associated with development at the proposed site, including designating public open space to minimise visual impacts, providing a mix of single storey and two storey housing designed and located to minimise landscape impact and screen planting using native species to minimise visual impact. Policy ETN9 states that proposals will be supported where the key features of the area, including landscape character, are maintained, and enhanced; there is no loss of important open, green, or landscaped areas that contribute to the character and appearance of the settlement, and the principles of the Easton Design Guide are adhered to.
- 9.24 Overall, the spatial strategy and the plan policies in place to protect the landscape and secure a design-led approach in development, as well as protect and enhance a network of open spaces, are likely to lead to **minor positive effects** for this theme.

## Historic environment

- 9.25 Growth within and surrounding the settlement area is expected to be constrained by designated heritage assets; in the ENP area there are a total 31 listed buildings (one Grade I, 30 Grade II), in addition to a scheduled monument and the Easton Conservation Area. The most recent Easton Conservation Area Appraisal undertaken in 2014 highlighted that inappropriate new development and the cumulative effect of incremental change are a threat to the special qualities contributing to the conservation area. Therefore, any new development within and within proximity to the village boundary has the potential to put pressure on the conservation area.
- 9.26 The proposed site under policy ETN3 is located adjacent to the conservation area with one listed building located nearby, the Grade II listed Verandah Cottages. There is existing screening from the site, but the setting of this listed building could still be impacted by inappropriate development. Policy ETN3 indicates the importance of minimising impacts to nearby heritage assets and requires an open space setting along the frontage of the site.
- 9.27 Additionally, there are a number of locally important, non-designated heritage assets within the ENP area. These are to be retained and protected under policy ETN8.
- 9.28 Policy ETN1 requires development proposals to only be permitted where they will not have an unacceptable impact on the historic built environment. Furthermore, ETN9 states that proposals will be supported where special features and qualities identified in the conservation area appraisal are maintained and enhanced.
- 9.29 Overall, it is recognised that the spatial strategy has the potential to impact heritage settings in the neighbourhood area, but the plan policies identify measures which help to reduce the significance of impacts, the effects are considered likely to be minimal/ **broadly neutral** at this stage.

## Land, soil, and water resources

- 9.30 The effects of increased land use in the ENP through housing development should be investigated to fully understand the impacts on the Deben (Brandeston Bridge – Melton) Water Body. Awarded a failed chemical status in 2019 for the presence of hazardous substances, increased pollution could cause the waterbody's quality to decrease further (for example, through increased waste entering the waterbody).
- 9.31 The ENP does not introduce policy around water protection for the whole neighbourhood area, however policy ETN3 outlines the provision for SUDS on the allocated site to help mitigate surface water runoff which will reduce the amount of water reaching the waterbody. Furthermore, policy ETN9 states that proposals will be supported where any water run-off would not add to or create surface water flooding; this would also the amount of pollution travelling to the Deben (Brandeston Bridge – Melton) waterbody is reduced.
- 9.32 Much of the ENP area is underlain by Grade 3 (Good to Moderate) and Grade 2 (Very Good) agricultural land, with sections of Grade 4 (Poor) largely following the path of the River Deben. The results show that most of the undeveloped areas of land in the ENP area have a Moderate (20-60%) area to High (>60%) likelihood of being underlain by best and most versatile land (BMV). The ENP does not include a specific policy to protect this land. However, the neighbourhood plan does include policies that will indirectly benefit land, soil, and water resources within Easton – such as ensuring there is no detrimental impact on the landscape through a mix of housing types (ETN3), retaining existing features in the landscape (ETN6) and ensuring there is no loss of important open and green areas (ETN9).
- 9.33 The allocated site under policy ETN3 is greenfield; as such, it is likely to lead to negative effects in relation to soil resources as development is taking place on land that could potentially support arable usages, resulting in a permanent loss that cannot be mitigated.
- 9.34 Overall, despite the inevitable **minor negative effects** of developing on a greenfield site, the spatial strategy and plan policies perform well in relation to this theme.

## Community wellbeing

- 9.35 By allocating land to meet the forecasted housing need over the plan period, the ENP performs positively in relation to this theme. By ensuring there is a mix of housing under ENP policy ETN3 the plan is ensuring the development caters for a variety of people. Furthermore, this policy provides benefits for existing residents of Easton by providing a new equipped play area, a new open space and improved footway links and provision for safe pedestrian crossings across the wider public rights of way (PRoW) network.
- 9.36 Additionally, there are local green spaces within the ENP area that make important community wellbeing contribution through supporting access to nature for the community. Policy ETN7 identifies and designates six local green spaces.

- 9.37 There is a small but varied group of community assets and infrastructure in Easton, including individual businesses, a church, a primary school, a campsite, a public house, the car park, a playing field, a cricket and bowls club, the village club and the play areas and open spaces. These are designated and protected under policy ETN10 – and proposals for the enhancement of these services and facilities will be supported where there is no detrimental impact to the natural and historic environment as well as the amenity of the Easton residents.
- 9.38 Considering these points, **significant positive effects** are considered a likely outcome in relation to this theme when considering the spatial strategy and the plan policies.

## Transportation

- 9.39 There are no train stations in the ENP area, nor do any bus routes service the area. The ENP highlights that the road through the village of Easton tends to form a rat-run for vehicles travelling between the A12 at Wickham Market and the A1120 at Earl Soham. This stretch of road often results in speeding but traffic calming measures are limited due to the historic character of the village. The ENP is well served with a good network of public footpaths and PRow. There are no policies within the ENP relating to local transportation implementation or improvement.
- 9.40 Policy ETN3 indicates the proposed site is located close to the existing settlement core, reducing the need to travel by vehicle to reach services and facilities. Additionally, policy ETN3 requires the development at the allocated site to provide a footway link and the provision of safe pedestrian travel across the wider PRow network in the area. Policy ETN9 outlines proposals will be supported where they maintain or enhance the safety of the highway network, ensuring permeability through new housing areas and connecting new development to the heart of the existing settlement and providing one electric vehicle charging point per new off-street parking place. New parking spaces will reduce congestion issues experienced by increased parking on roads.
- 9.41 Overall, with growth anticipated in the neighbourhood area with or without the ENP, increases in the baseline vehicle use on local roads are inevitable. As there are no sustainable modes of transport operating in the ENP area, the plan has made provision for electric vehicle charging points and improvements to the public rights of way network. As such, **neutral effects** are expected under the spatial strategy and the plan policies.



# 10. Conclusions and recommendations

## Conclusions

- 10.1 The appraisal considers that the only significant effects likely to arise in the implementation of the ENP are positive in nature and relate to the SEA theme of community wellbeing. This reflects the vision of the ENP to have a “*thriving and vibrant community*”, and the policies linked to housing – including ensuring delivered housing meets the needs of the community.
- 10.2 Minor positive effects are expected for the SEA themes of biodiversity and geodiversity and landscape, reflecting the importance the ENP places on the natural environment and design-led development, as well as the avoidance and mitigation measures provided by the spatial strategy and plan policies.
- 10.3 Neutral effects are concluded in relation to the SEA themes of climate change, historic environment, and transportation, reflecting the plan’s avoidance and mitigation measures that ensure new development does not cause significant deviations from the baseline conditions recorded.
- 10.4 Minor negative effects are predicted in relation to the SEA theme of land, soil, and water resources. This is due to the potential loss of best and most versatile land (BMV) and a greenfield site allocation that cannot be mitigated for.

## Cumulative effects

- 10.5 The housing allocation will benefit the wider Housing Market Area in meeting locally identified housing needs and positive cumulative effects are considered likely in this respect. Biodiversity net gains are also considered likely to contribute towards achieving positive cumulative effects that enhance biodiversity connections within and beyond the district.

## Recommendations

- 10.6 No recommendations have been identified at this stage.

## **Part 3: What are the next steps?**



# 11. Next steps

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

## Plan finalisation

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

11.3 Assuming the examination leads to a favourable outcome, the ENP will then be subject to a referendum, organised by East Suffolk Council. If more than 50% of those who vote agree with the ENP, then it will be 'made'. Once 'made', the ENP will become part of the Development Plan for East Suffolk Council, covering the defined neighbourhood area.

## Monitoring

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

11.5 It is anticipated that monitoring of effects of the ENP will be undertaken by East Suffolk Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects have been identified that would warrant additional or more stringent monitoring at this stage.

# Appendix A Regulatory requirements

As discussed in **Chapter 1** above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. **Table AA.1** overleaf links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table AA.2** explains this interpretation. **Table AA.3** identifies how and where within the Environmental Report the regulatory requirements have/ will be met.

**Table AA.1 Questions answered by this Environmental Report, in-line with an interpretation of regulatory requirements**

Environmental Report question	In line with the SEA Regulations, the report must include... <sup>20</sup>
What is the plan seeking to achieve?	<ul style="list-style-type: none"> <li>An outline of the contents and main objectives of the plan.</li> </ul>
What is the sustainability 'context'?	<ul style="list-style-type: none"> <li>Relationship with other relevant plans and programmes.</li> <li>The relevant environmental protection objectives established at international or national level.</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.</li> </ul>
What's the scope of the SEA?	<ul style="list-style-type: none"> <li>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.</li> <li>The environmental characteristics of areas likely to be significantly affected.</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.</li> </ul>
What is the sustainability 'baseline'?	<ul style="list-style-type: none"> <li>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.</li> <li>The environmental characteristics of areas likely to be significantly affected.</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.</li> </ul>
What are the key issues and objectives?	<ul style="list-style-type: none"> <li>Key problems/issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment.</li> </ul>
What has plan-making / SEA involved up to this point?	<ul style="list-style-type: none"> <li>Outline reasons for selecting the alternatives dealt with.</li> <li>The likely significant effects associated with alternatives.</li> <li>Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.</li> </ul>
What are the assessment findings at this stage?	<ul style="list-style-type: none"> <li>The likely significant effects associated with the Regulation 14 version of the plan.</li> <li>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the Regulation 14 version of the plan.</li> </ul>
What happens next?	<ul style="list-style-type: none"> <li>The next steps for the plan making /SEA process.</li> </ul>

<sup>20</sup> NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

**Table AA.2: Questions answered by this Environmental Report, in-line with regulatory requirements**

Schedule 2	Interpretation of Schedule 2		
The report must include...	The report must include...		
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>	i.e. answer – <i>What's the scope of the SA?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>	
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'baseline'?</i>	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'		
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	i.e. answer - <i>What are the key issues &amp; objectives?</i>	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance		
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal		
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]	
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.		
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]	
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan		
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]	

**Table AA.3: ‘Checklist’ of how (throughout the SA process) and where (within this report) regulatory requirements have been, are and will be met.**

Regulatory requirement	Discussion of how requirement is met
<b>Schedule 2 of the regulations lists the information to be provided within the SA Report</b>	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 (‘What is the plan seeking to achieve’) presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters have been considered in detail through scoping work, which has involved dedicated consultation on a Scoping Report. The ‘SEA framework’ – the outcome of scoping – is presented within Chapter 3 (‘What is the scope of the SEA?’).
3. The environmental characteristics of areas likely to be significantly affected;	
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The SEA framework is presented within Chapter 3 (‘What is the scope of the SEA’). Also, the SEA Scoping Report presents key messages from the context review.  With regards to explaining “ <i>how...considerations have been taken into account</i> ”, Chapter 7 explains the Steering Group’s ‘reasons for supporting the preferred approach’, i.e., explains how/ why the preferred approach is justified in light of alternatives appraisal.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapter 6 presents alternatives appraisal findings (in relation to housing growth, which is a ‘stand-out’ plan policy area).  Chapters 9 presents an appraisal of the plan. With regards to assessment methodology, Chapter 8 explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g., timescale.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The assessment highlights certain tensions between competing objectives, which might potentially be actioned by the Examiner, when finalising the plan.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 4 and 5 deal with ‘Reasons for selecting the alternatives dealt with’, in that there is an explanation of the reasons for focusing on particular issues and options.  Also, Chapter 7 explains the Parish Council’s ‘reasons for selecting the preferred option’ (in-light of alternatives assessment).

Regulatory requirement	Discussion of how requirement is met
9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 11 presents measures envisaged concerning monitoring.
10. A non-technical summary of the information provided under the above headings	The NTS is provided at the beginning of this Environmental Report.
<b>The SA Report must be published alongside the Draft Plan, in accordance with the following regulations</b>	
authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	At the current time, this Environmental Report is published alongside the 'pre-submission' version of the Easton Neighbourhood Plan, with a view to informing Regulation 14 consultation.
<b>The SA must be taken into account, alongside consultation responses, when finalising the plan.</b>	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	Assessment findings presented within this Environmental Report, and consultation responses received, have been fed back to the Steering Group and have informed plan finalisation.

# Appendix B Scoping information

## B.1 Air quality

### Policy context

**Table B1.1** below presents the most relevant documents identified in the policy review for the purposes of the Neighbourhood Plan.

**Table B1.1 Plans, policies and strategies reviewed in relation to air quality**

Document title	Year of publication
<a href="#">National Planning Policy Framework (NPPF)</a>	2021
<a href="#">The Clean Air Strategy</a>	2019
<a href="#">UK plan for tackling roadside nitrogen dioxide concentrations</a>	2017
<a href="#">A Green Future: Our 25 Year Plan to Improve the Environment</a>	2018
<a href="#">Suffolk Coastal Local Plan</a>	2020
<a href="#">East Suffolk Air Quality Strategy</a>	2021

The key messages emerging from the review are summarised below:

- The ENP will be required to be in general conformity with the NPPF, which predominantly seeks early planning to reduce/mitigate air quality impacts in development and to take advantage of opportunities to improve air quality. Measures to improve air quality include traffic and travel management and green infrastructure provision. Strategic development is expected to be focused on locations that have or will be provided with high levels of accessibility; supporting both a reduced need to travel and offering a genuine choice of transport modes. Smaller-scale development should consider the potential for cumulative effects in relation to air quality.
- Air Quality Management Areas (AQMAs) are declared in areas which exceed national objectives for levels of particulates, nitrogen dioxide, sulphur dioxide, ozone, benzene, polycyclic aromatic hydrocarbons, butadiene, carbon monoxide, lead and/or nitrogen oxides.
- To improve air quality across the UK, national strategies have in the last few decades focused on regulatory frameworks, investment by industry in cleaner processes, and a shift in the fuel mix towards cleaner forms of energy (largely at point sources). Whilst there are dedicated strategies to reducing roadside emissions (as a significant source of nitrogen dioxide emissions), recent objectives outlined in the Clean Air Strategy seek to recognise wider sources (including smaller contributors and diffuse sources) that contribute to poor air quality.
- The ENP will also be required to be in general conformity with the relevant policies outlined in the Suffolk Coastal Local Plan, including:
  - Policy SCLP7.1: Sustainable Transport.
  - Policy SCLP9.1: Low Carbon & Renewable Energy.
  - Policy SCLP10.3: Environmental Quality.



- Policy SCLP11.2: Residential Amenity.
- The East Suffolk Air Quality Strategy is a response to AQMA declarations. It establishes a strategic framework to drive air quality considerations to the heart of Council policies, procedures, and decisions, to ensure that East Suffolk is well placed to maintain good air quality and secure future improvements across the district. The aims of the East Suffolk Air Quality Strategy are as follows:
  - Raise public awareness of the importance of air quality.
  - Reduce emissions of particulate matter (PM2.5) within the district.
  - Encourage and enable active travel to benefit air quality and improve public health.
  - Document the efforts made to improve air quality across the different areas of the council.

## Baseline summary

In line with the Local Air Quality Management (LAQM) as set out in Section 82 of the Environment Act (1995), Councils are required to assess Air Quality standards within the region on an annual basis. There are currently two AQMAs in East Suffolk, located in Stratford St Andrew and Woodbridge, which are both declared due to elevated concentrations of nitrogen dioxide (NO<sub>2</sub>). The neighbourhood area is not within or nearby to either of these two AQMAs.

The East Suffolk area is governed by two-tier authorities – a District Council (East Suffolk Council) and a County Council (Suffolk County Council). Suffolk County Council have a duty to proactively engage with the District Council as soon as an air quality issue is identified and have the responsibility for changes needed to the highways system, including transport planning. However, the Highways Authority are ultimately responsible for strategic transport interventions, and these remain outside of the scope of the ENP. At a more local level, areas of poorer air quality are generally associated with traffic hotspots, particularly associated with school drop off and collection.

## Future baseline

Future growth in the neighbourhood area will ultimately affect the levels of traffic and congestion experienced, and in the absence of suitable planning and mitigation this could lead to a deterioration in air quality. However, it is unlikely that this will be significant given the moderate housing needs of the neighbourhood area. Nevertheless, suitable mitigation measures should be incorporated into the design of new development areas to maintain air quality.

Positive planning could also be beneficial for air quality through opportunities to improve accessibility, particularly in terms of active travel and encouraging more local walkable journeys and sustainable connections.

## Key issues

Following the consideration of the baseline information and policy context review, the following key issues within the neighbourhood area are identified in relation to air quality:



- There are currently two AQMAs in East Suffolk, however the neighbourhood area is not within or nearby to either of these two AQMAs. Given this, and the moderate housing needs of the neighbourhood area, it is unlikely that development in the area will have a significant impact on air quality.
- The effects of traffic and congestion on air quality will still be considered through the transportation theme in **Chapter B.8**.

Due to the absence of any significant air quality issues raised in relation to the draft ENP, **the air quality theme has been scoped out for the purposes of the SEA process.**

## B.2 Biodiversity and geodiversity

### Policy context

**Table B2.1** below presents the most relevant documents identified in the policy review for the purposes of the Neighbourhood Plan SEA.

**Table B2.1 Plans, policies and strategies reviewed in relation to biodiversity and geodiversity**

Document title	Year of publication
<a href="#">National Planning Policy Framework (NPPF)</a>	2021
<a href="#">The Clean Air Strategy</a>	2019
<a href="#">UK plan for tackling roadside nitrogen dioxide concentrations</a>	2017
<a href="#">A Green Future: Our 25 Year Plan to Improve the Environment</a>	2018
<a href="#">Suffolk Coastal Local Plan</a>	2020
<a href="#">Biodiversity Action Plan</a>	2018

The key messages emerging from the review are summarised below:

- The ENP will be required to be in general conformity with the NPPF, which highlights that opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity. This includes using a strategic approach to maintaining and enhancing networks of habitats and green infrastructure at the wider catchment or landscape scale.
- Support is given through the NPPF to establishing coherent ecological networks that are more resilient to current and future pressures. Trees notably make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, and that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards).
- Over the past decade, policy (e.g., The Natural Environment White Paper and Biodiversity 2020) has demonstrated a move away from the traditional approach of protecting biodiversity, to a wider landscape approach to enhancing biodiversity, as part of the overall aims to halt biodiversity loss. The 25 Year Environment Plan places emphasis on improvements to the natural environment; identifying the need to “*replenish depleted soil, plant trees, support wetlands and peatlands, rid seas and rivers of rubbish, reduce greenhouse gas emissions, cleanse the air of pollutants, develop cleaner, sustainable energy and protect threatened species and habitats*”. Working at a landscape scale transformation is expected to connect habitats into larger corridors for wildlife.
- The Environment Act 2021 sets parameters for biodiversity gain as a condition of planning permission, as well as biodiversity gain site registers and biodiversity credits. The Act identifies a general duty to conserve and enhance biodiversity, including through biodiversity reports and local nature recovery strategies. Local nature recovery strategies will identify biodiversity priorities for the strategy area as well as a local habitat map. Habitat maps are expected to include recovery

and enhancement areas which are or could become of importance for biodiversity.

- The ENP will also be required to be in general conformity with the relevant policies outlined in the Suffolk Coastal Local Plan, including:
  - Policy SCLP8.2: Open Space.
  - Policy SCLP9.6: Sustainable Drainage Systems.
  - Policy SCLP10.1: Biodiversity and Geodiversity.
- The Biodiversity Action Plan, published by the East Suffolk Drainage Board, identifies objectives for the conservation and enhancement of biodiversity within the drainage district, and goes on to describe targets and actions that will hopefully delivery these objectives. It is hoped that implementing the plan will contribute to the achievement of improvements and increased areas of priority habitats and species.

## Baseline summary

### Designated sites

The Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) was designated in 1970 with the purpose of conserving and enhancing the habitats and biodiversity of the special heathlands, woodlands, estuaries, and coast<sup>21</sup>. A zone has been defined where residents will likely travel to visit the coast, which includes the neighbourhood area, and this has recreational disturbance impacts. As a result, the Suffolk Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) has been developed and requires all new development within the zone to make a financial contribution towards mitigating these impacts.

There are no designated sites within or near the neighbourhood area, but there are several Sites of Special Scientific Interest (SSSI) Impact Risk Zones (IRZ) that cover the neighbourhood area. However, as the proposed development does not exceed 50 units, Natural England do not need to be consulted on the likely risks the development pose to the SSSI.

### Priority habitats and species

As shown in **Figure B2.1**, there are a variety of Biodiversity Action Plan (BAP) priority habitats located within or within proximity to the ENP, including coastal and floodplain grazing marsh, deciduous woodland, good quality semi-improved grassland, lowland meadows, and traditional orchard.

Coastal and floodplain grazing marsh is defined in the Biodiversity Action Plan as a “periodically inundated pasture, or meadow with ditches which maintain the water level, containing standing brackish or fresh water”. The mosaic of habitats within these sites provides diverse conditions, which support a wide range of plants, invertebrates, birds, and animals.

Priority species benefiting from the coastal and floodplain grazing marsh Habitat Action Plan include:

- Water vole.

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<sup>21</sup> Suffolk Coast and Heaths (no date): ‘What is an Area of Outstanding Natural Beauty?’, [online] available to access via [this link](#)

- Barn owl.
- Kestrel.
- Overwintering bird population.
- Breeding waders (e.g., redshank, avocet and lapwing).

The Suffolk Biodiversity Information Service lists Suffolk's priority species<sup>22</sup>, including several species of reptiles and amphibians, birds, mammals, bees, beetles, butterflies, moths, and spiders. Many of these species are protected under the Wildlife and Countryside Act 1981 (as amended) and under Section 41 of the Natural Environment and Rural Communities Act 2006. Hence, the BAP priority habitats are likely to support populations of such species.

In terms of the national habitat network, the eastern side of the neighbourhood area is covered by Network Enhancement Zone 1 and Network Enhancement Zone 2. The former is *"land connecting existing patches of primary and associated habitats which is likely to be suitable for creation of the primary habitat"*, and the latter is *"land connection existing patches of primary and associated habitats which is less likely to be suitable for creation of the primary habitat"*<sup>23</sup>.

There is also a small area of Restorable Habitat in the northeastern corner of the neighbourhood area, which is an *"area of land, predominantly composed of existing semi-natural habitat where the primary habitat is present in a degraded or fragmented form and which are likely to be suitable for restoration"*.

## Future baseline

Habitats and species will potentially face increasing pressures from future development within the neighbourhood area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change. This has the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.

The ENP presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats and species at an early stage of planning for future growth. To maintain and improve the condition of biodiversity, it will be vital to not only protect and enhance important habitats, but also the connections between them. It will be crucial to effectively coordinate the delivery of new development to ensure that opportunities to improve green infrastructure and ecological corridors are maximised.

## Key issues

Following the consideration of the baseline information and policy context review, the following key issues within the neighbourhood area are identified in relation to biodiversity and geodiversity:

- A network of BAP Priority Habitats exist across the plan area, and it will be important to ensure that the spatial strategy and policies of the ENP seek to support this network, particularly by avoiding habitat loss and fragmentation, but

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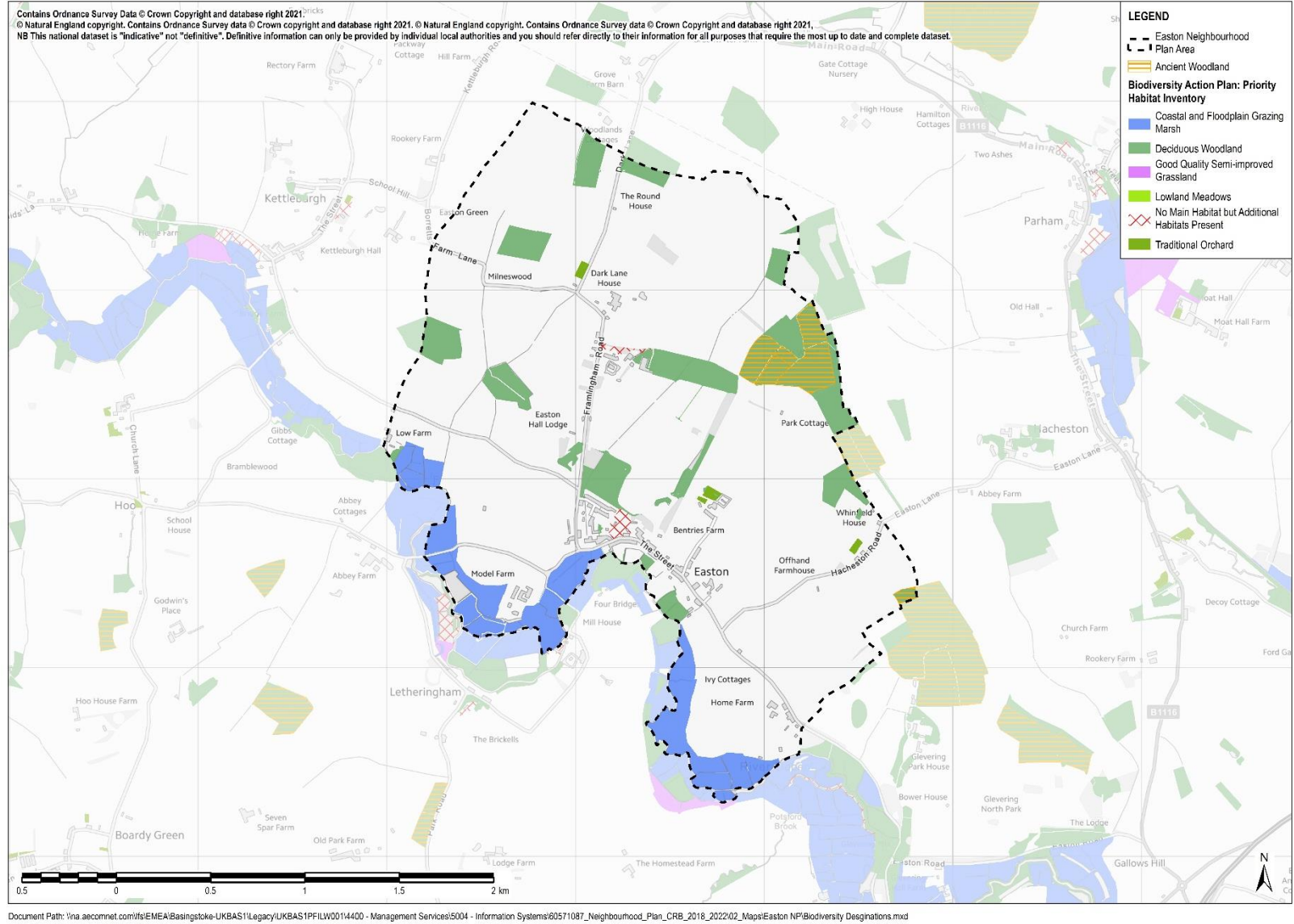
<sup>22</sup> Suffolk Biodiversity Information Service (2021): 'Priority species and habitats', [online] available to access via [this link](#)

<sup>23</sup> Natural England (2020): 'National Habitat Network Maps', [online] available to access via [this link](#)

also by supporting any opportunities that arise to extend or enhance this network.

- One of the key BAP Priority Habitats present in the neighbourhood area is coastal and floodplain grazing marsh, which provide a habitat for water vole, barn owl, kestrel, overwintering bird population, and breeding waders (e.g., redshank, avocet and lapwing).
- Priority species within the neighbourhood area include several species of reptiles and amphibians, birds, mammals, bees, beetles, butterflies, moths, and spiders.
- The eastern side of the neighbourhood area is covered by Network Enhancement Zone 1, and there is a small area of Restorable Habitat in the northeastern corner of the neighbourhood area, which the ENP should seek to conserve.

## Figure B2.1 Biodiversity Action Plan (BAP) Priority Habitats in the neighbourhood area



## B.3 Climate change

### Policy context

**Table B3.1** below presents the most relevant documents identified in the policy review for the purposes of the Neighbourhood Plan SEA.

**Table B3.1 Plans, policies and strategies reviewed in relation to climate change**

Document title	Year of publication
<a href="#">National Planning Policy Framework (NPPF)</a>	2021
<a href="#">UK Climate Change Act</a>	2008
<a href="#">UK (second) National Adaptation Programme 2018 to 2023</a>	2018
<a href="#">The Clean Air Strategy</a>	2019
<a href="#">Clean Growth Strategy</a>	2019
<a href="#">Net Zero Strategy: Build Back Greener</a>	2021
<a href="#">UK Sixth Carbon Budget</a>	2020
<a href="#">25-Year Environment Plan</a>	2019
<a href="#">National Infrastructure Assessment</a>	2018
<a href="#">UK Climate Change Risk Assessment</a>	2017
<a href="#">Flood and Water Management Act</a>	2010
<a href="#">National Flood and Coastal Erosion Risk Management Strategy</a>	2020
<a href="#">Suffolk Coastal Local Plan</a>	2020
<a href="#">Environmental Guidance Note</a>	2020
<a href="#">Suffolk Flood Risk Management Strategy</a>	2016

The key messages emerging from the review are summarised below:

- The ENP will be required to be in general conformity with the NPPF, which requires proactive planning to both mitigate and adapt to climate change. Planning policies are expected to improve the resilience of communities and infrastructure to climate change impacts, avoid inappropriate development in the flood plain, and support the move to a low carbon economy. The NPPF recognises the potential for planning to shape places in ways that contribute to radical reductions in greenhouse gas (GHG) emissions, and deliver long-term resilience, including through reuse, regeneration, and conversion.
- The Clean Air Strategy, Clean Growth Strategy, Net Zero Strategy, and the 25-Year Environment Plan are a suite of documents which seek to progress the government's commitment under the UK Climate Change Act to becoming net zero by 2050. The documents set out detailed proposals on how the government will tackle all sources of air pollution, whilst maintaining an affordable energy supply and increasing economic growth. This parallels with the 25-year Environment Plan, which further seeks to manage land resources sustainably, recover and reinstate nature, protect soils and habitats, increase resource efficiency, improve water quality, and connect people with the



environment. The documents also interlink with the government's commitment to decarbonising transport, a recognised challenge that needs more work in a timely manner if government are to achieve net zero targets. Furthermore, the decarbonisation plan recognises the twinned need to undertake action to adapt the transport sector and increase resilience to climate change risks; and this challenge is more directly addressed through the UK's National Adaptation Programme.

- East Suffolk Council declared a climate emergency in July 2019 and has committed to become carbon neutral by 2030. The actions taken so far by the Council to address climate change revolve around the following:
  - Energy Efficiency.
  - Renewable Energy.
  - Nature and Wildlife.
  - Siting and Orientation.
  - Sustainable Travel.
  - Surface water run-off.
  - Water Conservation.
  - Materials and Waste.
- Suffolk Flood Risk Management Strategy is used as a tool to help everyone understand and manage flood risk within the county. The Strategy's primary focus is on 'local flooding' from surface water, groundwater, or ordinary watercourses such as streams and ditches. This type of 'flash flooding', generally caused by localised heavy rainfall, appears to be increasingly common. The main aim of the strategy is to reduce the risk of flooding and the misery and economic damage that flooding causes, in a sustainable manner. In addition to this, any flood management activities carried out will aim to enhance the built and natural environment.
- The ENP will also be required to be in general conformity with the relevant policies outlined in the Suffolk Coastal Local Plan, including:
  - Policy SCLP9.1: Low Carbon & Renewable Energy.
  - Policy SCLP9.2: Sustainable Construction.
  - Policy SCLP9.5: Flood Risk.
  - Policy SCLP9.6: Sustainable Drainage Systems.
  - Policy SCLP9.7: Holistic Water Management.

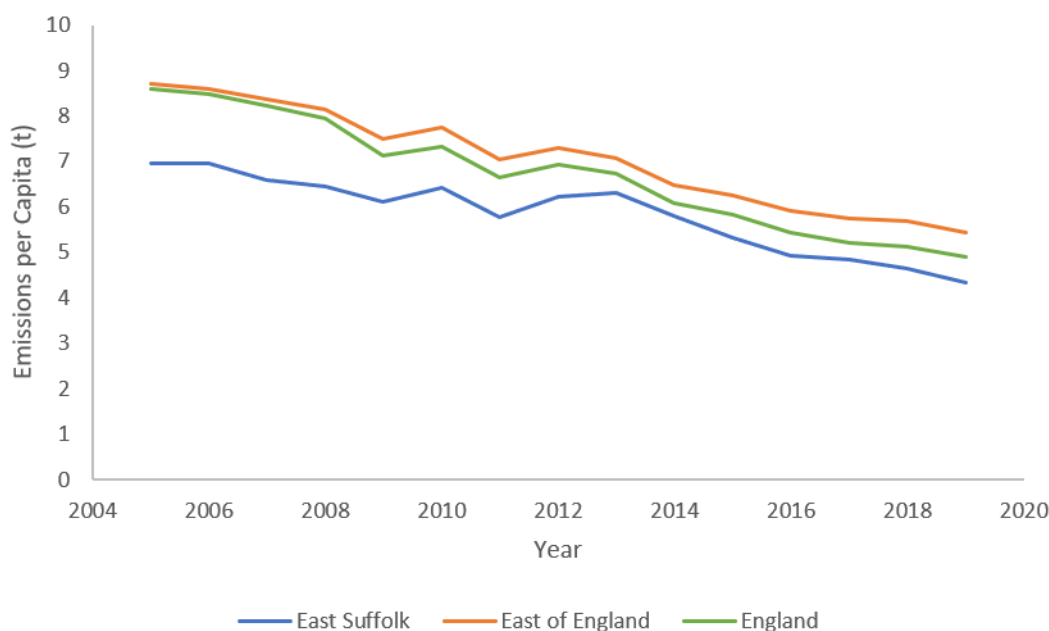
## Baseline summary

### Contribution to climate change

In the 2019 amendment to the Climate Change Act, the government committed to reaching 'net zero' carbon emissions by 2050. Carbon dioxide (CO<sub>2</sub>) emissions from the built environment are monitored and recorded at the local authority level.

**Figure B3.1** indicates that CO<sub>2</sub> emissions per capita (t) in East Suffolk have been consistently lower than both the East of England and England during the period 2005

to 2019. East Suffolk has seen a 37.7% reduction in emissions per capita between 2005 and 2009, which is comparable to the 37.5% reduction seen for the East of England. However, this figure is lower than the 42.9% reduction in emissions seen for England.



**Figure B3.1 CO<sub>2</sub> emissions per capita (t) for the period 2005 to 2019<sup>24</sup>**

Transport is the largest emitting sector in the UK, producing 27% of total emissions in 2019<sup>25</sup>. Of this, 91% came from road transport vehicles (111 MtCO<sub>2</sub>e). The biggest contributors to this were cars and taxis, which made up 61% of the emissions from road transport (68 MtCO<sub>2</sub>e).

Many areas within the Suffolk Coastal Local Plan do not have access to convenient public transport and many local roads are single track and unsuitable for conventional public transport such as buses. As a result, transport emissions from cars travelling on minor roads contribute significantly to overall emissions in the neighbourhood area.

The uptake of Ultra Low Emission Vehicles (ULEVs) will contribute positively towards the reduction of road transport related emissions. In line with assumptions made by the Department for Transport's 'Road to Zero' report (2018), it is assumed that ULEV uptake will increase rapidly in the coming decade and therefore aside from HGVs, all vehicles could be ultra-low emission (powered either by hydrogen or electricity) by 2030.

There are no fast or rapid charging locations within the neighbourhood area, however there is a charging location at the Co-Op in nearby Wickham Market.

### Effects of climate change

Research on the probable effects of climate change in the UK was released in 2018 by the UK Climate Projections (UKCP18)<sup>26</sup> team. UKCP18 gives climate information

<sup>24</sup> UK Gov (2021): 'UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2019' [online] available to access via [this link](#)

<sup>25</sup> UK Gov (2021): 'Transport and environment statistics: Autumn 2021' [online] available to access via [this link](#)

<sup>26</sup> Data released 26th November 2018 [online] available to access via [this link](#)

for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and level of confidence in each prediction.

As highlighted by the research, the effects of climate change (under medium emissions scenarios 50th percentile and RCP6) for the East of England during the period 2020-2039 compared to the period 1981-2000 are likely to be as follows:

- A central estimate of increase in annual mean temperatures of between 0.3°C and 1.4°C.
- A central estimate of change in mean precipitation of 0 to +8% in winter and 0 to -6% in summer.

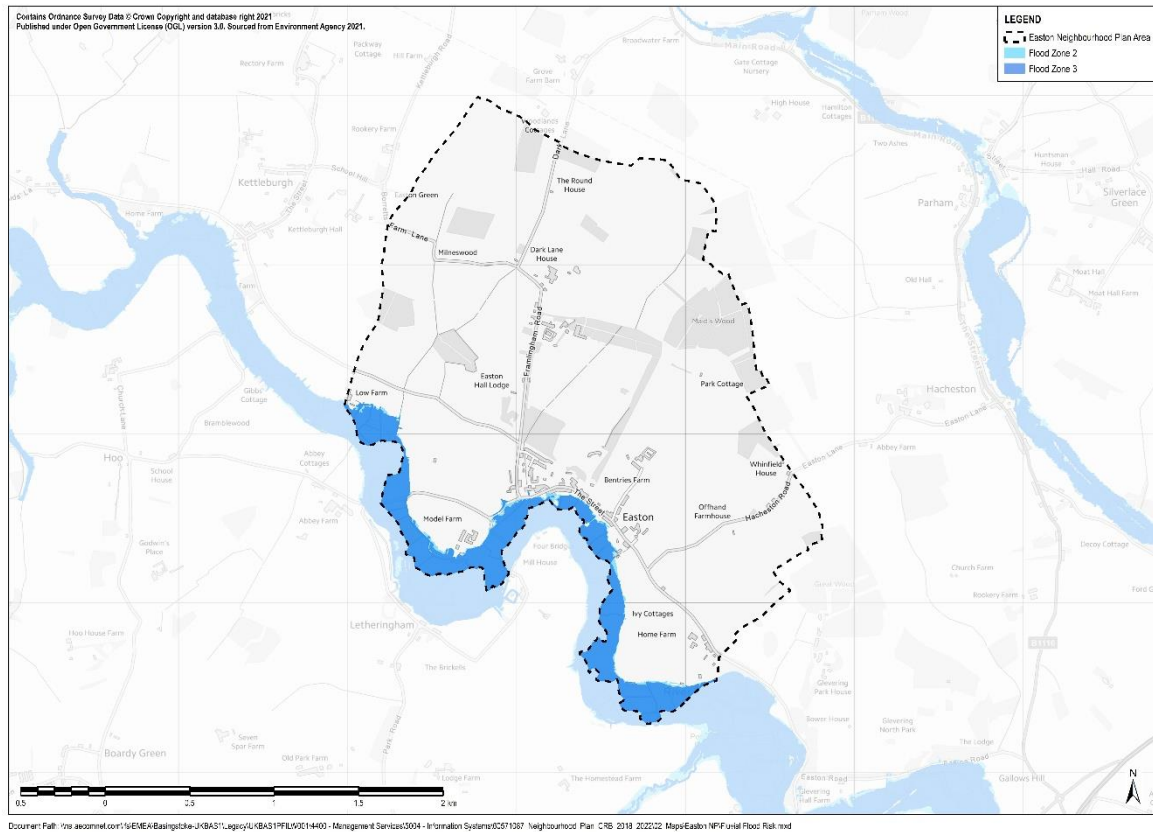
As a result of these changes, the neighbourhood area may face increasing risks related to climate change, including:

- Increased incidence of heat related illnesses and deaths during summer.
- Increased incidence of illnesses and deaths related to exposure to sunlight (e.g., skin cancer, cataracts).
- Increased risk of injuries and deaths due to the number of storm events.
- Effects on water resources from climate change.
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain.
- Increased risk of flooding, including vulnerability to 1:100-year floods.
- A need to upgrade flood defences.
- Soil erosion due to flash flooding.
- Loss of species that are at the edge of their southerly distribution.
- Spread of species at the northern edge of their distribution.
- Increased drought and flood related problems.
- Risk of road surfaces melting more frequently due to increased temperature.
- Flooding of roads.

### Flood risk

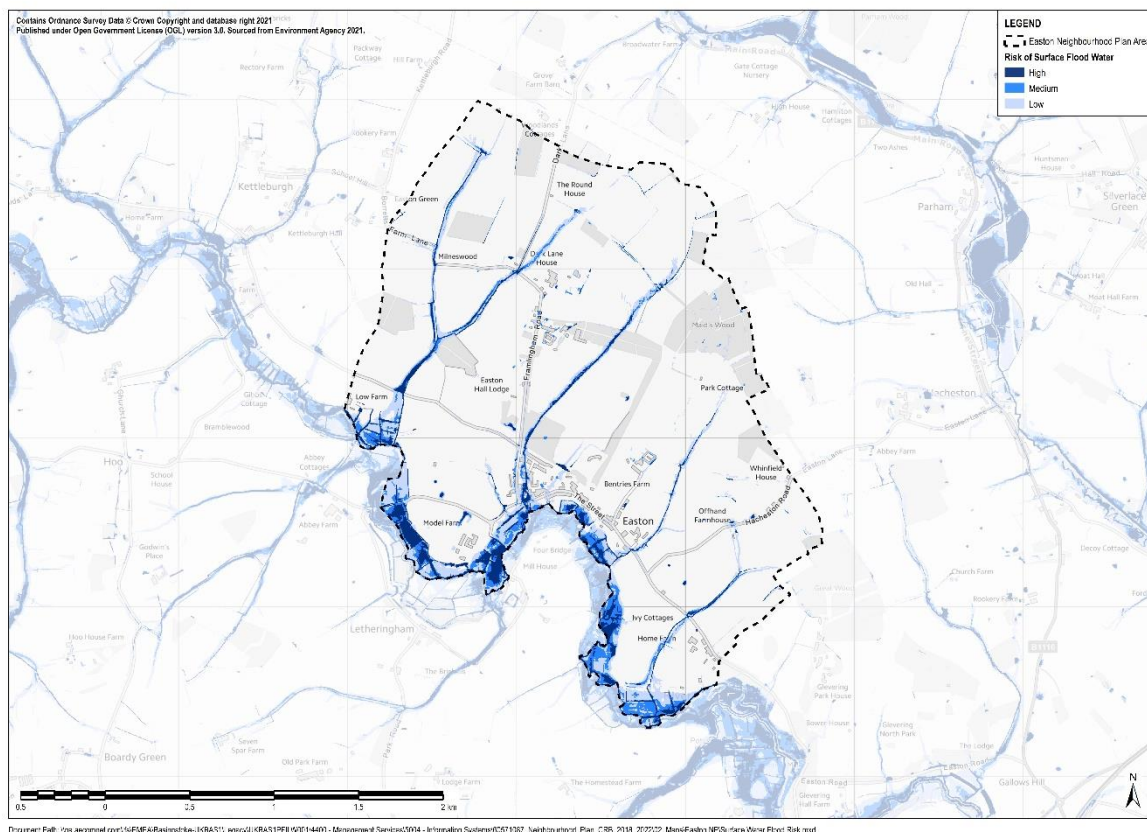
The entire neighbourhood area lies within the Deben Operational Catchment. The southern boundary of the neighbourhood area follows the River Deben.

As shown in **Figure B3.2**, fluvial flood risk in the neighbourhood area largely follows the course of the River Deben. Although there are properties south of The Street, where the flood risk is concentrated, none of the properties in this area fall directly into Flood Zone 3. Nevertheless, future development in Easton should avoid this area as the risk of fluvial flooding is high.



**Figure B3.2 Fluvial flood risk in the neighbourhood area**

As shown in **Figure B3.3** overleaf, surface water flooding in the neighbourhood area also largely follows the course of the River Deben, but also expands further into the Plan area. Areas of particular concern include parts of Sanctuary Bridge Road, Hall Road, The Street, School Lane, Dark Lane, and Borretts Farm Lane. Notably, the areas where these roads have a medium to high flood risk appear to be in the same locations as streams and ditches that feed into the River Deben.



**Figure B3.3 Surface water flood risk in the neighbourhood area**

According to the Suffolk Flood Risk Management Strategy, there were 1095 incidents of surface water flooding reported between 2012 and 2015 caused by heavy and/or prolonged rainfall. A Preliminary Flood Risk Assessment (PFRA) was undertaken by Suffolk County Council to satisfy obligations under the Flood Risk Regulations 2009. This work identified key areas in Suffolk where the potential risk of surface water flooding is thought to be greatest. This has allowed the Council to rank the main towns/villages at risk in the county. Easton does not feature on this list as there are not many properties at risk.

## Future baseline

Climate change has the potential to increase the occurrence of extreme weather events in the neighbourhood area. This is likely to increase the risks associated with climate change, with an increased need for resilience and adaptation. Specifically, new development areas have the potential to increase flood risk through factors such as changing surface and ground water flows, overloading existing inputs to the drainage and wastewater networks, or increasing the number of residents exposed to areas of existing flood risk.

In terms of climate change contribution, per capita GHG emissions generated in the neighbourhood area may continue to decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies, including electric cars. However, increases in the built footprint of the neighbourhood area would contribute to increases in the absolute levels of GHG emissions.



## Key issues

Following the consideration of the baseline information and policy context review, the following key issues within the neighbourhood area are identified in relation to climate change:

- East Suffolk Council declared a climate emergency in July 2019 and has committed to become carbon neutral by 2030. The ENP should seek to maximise opportunities to support actions in tackling climate change. This may be through encouraging sustainable transport technologies, such as the use of EVs, and utilising sustainable drainage systems.
- Source data from the Department of Energy and Climate Change shows that East Suffolk has recorded lower CO<sub>2</sub> emissions per capita than both the East of England and England between 2005 and 2019. However, the reduction in emissions per capita in East Suffolk during this period has been lower than for England, which suggests that despite the strong commitments being made regarding climate change, current actions are not keeping up with those demonstrated at the national level.
- The transport sector continues to be a key challenge in terms of reducing emissions. Many areas within the Suffolk Coastal Local Plan area do not have access to convenient public transport and many local roads are single track and unsuitable for conventional public transport such as buses. The ENP provides opportunities to guide development towards the most accessible locations in the area and develop local infrastructure improvements or active travel opportunities.
- Fluvial flood risk in the neighbourhood area is largely linked to the River Deben. No existing dwellings within the neighbourhood area fall directly into Flood Zone 3, however future development in Easton should be concentrated away from the River Deben and consider future flood risk.
- Surface water flooding in the neighbourhood area is also largely linked to River Deben. Areas of particular concern include parts of Sanctuary Bridge Road, Hall Road, The Street, School Lane, Dark Lane, and Borretts Farm Lane. Notably, these areas appear to be in the same locations as streams and ditches that feed into the River Deben. Future development in Easton should incorporate Sustainable Drainage Systems (SuDS) and permeable surfaces to minimise the risk of surface water flooding.
- A Preliminary Flood Risk Assessment (PFRA) was undertaken by Suffolk County Council to identify key areas in Suffolk where the potential risk of surface water flooding is thought to be greatest. This has allowed the Council to rank the main towns/villages at risk in the county. Although Easton does not feature on this list, future development should be concentrated away from the areas of particular concern identified above.

## B.4 Landscape

### Policy context

**Table B4.1** below presents the most relevant documents identified in the policy review for the purposes of the Neighbourhood Plan SEA.

**Table B4.1 Plans, policies and strategies reviewed in relation to landscape**

Document title	Year of publication
<a href="#">National Planning Policy Framework (NPPF)</a>	2021
<a href="#">The 25 Year Environment Plan</a>	2018
<a href="#">The National Design Guide</a>	2019
<a href="#">National Model Design Code</a>	2021
<a href="#">Suffolk Coastal Local Plan</a>	2020
<a href="#">Suffolk Coastal Landscape Character Assessment</a>	2018
<a href="#">Settlement Sensitivity Assessment</a>	2018

The key messages emerging from the review are summarised below:

- The ENP will be required to be in general conformity with the NPPF which gives great weight to conserving and enhancing protected landscapes, as well as landscape character and scenic beauty. The scale and extent of development within these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.
- The NPPF recognises the role of green infrastructure in landscape settings, as well as the importance of designated biodiversity sites, habitats, woodland, historic features, agricultural land, and cultural landscapes. The positive contribution that land remediation can make in terms of addressing despoiled, degraded, derelict, contaminated and unstable land is also recognised.
- The 25-year Environment Plan and National Design Guide complement each other with their aims for a cleaner, greener country which puts the environment first and celebrates the variety of natural landscapes and habitats. Design is focused on beautiful, enduring, and successful places, which respond to local character and provide a network of high quality green open spaces.
- The ENP will also be required to be in general conformity with the relevant policies outlined in the Suffolk Coastal Local Plan, including:
  - Policy SCLP10.4: Landscape Character.
  - Policy SCLP11.8: Parks and Gardens of Historic or Landscape Interest.
- Proposals for development should be informed by, and sympathetic to, the special qualities and features as described in the Suffolk Coastal Landscape Character Assessment and Settlement Sensitivity Assessment. Development proposals will be expected to demonstrate their location, scale, form, design, and materials will protect and enhance:
  - The special qualities and features of the area.

- The visual relationship and environment around settlements and their landscape settings.
- Distinctive landscape elements including but not limited to watercourses, commons, woodland trees, hedgerows and field boundaries, and their function as ecological corridors.
- Visually sensitive skylines, seascapes, river valleys and significant views towards key landscapes and cultural features.
- The growing network of green infrastructure supporting health, wellbeing, and social interaction.

## Baseline summary

### Nationally protected landscapes

The ENP does not fall within a designated landscape area. However, the Suffolk Coast and Heaths AONB, a low-lying coastal landscape of astonishing variety, falls within the Suffolk Coastal Local Plan area and is located to the southeast of the neighbourhood area.

### National character areas

The neighbourhood area falls within the 83 South Norfolk and High Suffolk Claylands National Character Area<sup>27</sup>. This is an area of high and predominantly flat clay plateau, which is incised by numerous small-scale wooded river valleys with complex slopes. The underlying geology is chalk, which forms the principal aquifer, and shallow marine deposits overlain with glacial till, buried river gravels, lake sediments and bands of glacial outwash deposits.

### Local landscape and village scape character

Landscape and village scape character play an important role in understanding the relationship between people and place, identifying recognisable and distinct patterns in the landscape which make one area different from another. Landscape and village scape character assessments can help identify the value of landscapes and village scapes, in terms of both visual and amenity value, and they can also help identify the significance of the impacts resulting from development. Assessments often provide indications of the overall landscape sensitivity and landscape capacities for key areas within the regions.

The Suffolk Coastal Landscape Character Assessment identifies 33 landscape character areas, two of which fall within the neighbourhood area. Landscape character areas are unique areas that occur in only one place and are therefore geographically specific. They have their own individual character and identify.

The north of the neighbourhood area falls within the Easton and Glevering Estate Claylands, which is a small parcel of plateau land sandwiched between the upper reaches of the Deben Valley on the south west side and the Ore Valley to the north east. This area is entirely rural with only a few scattered farms, and with a regular, wooded estate farmland character heavily influenced by the two historic estates located here – Easton and Glevering. The overall impression is of scenic, well-managed farmland, and the associated vernacular estate architecture (local

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<sup>27</sup> Natural England (2014): 'NCA Profile: 83 South Norfolk and High Suffolk Claylands (NE544)', [online] available to access via [this link](#)



domestic building style) makes a very positive contribution. Land use is predominantly arable farmland, interspersed with woodland, although there is a large block of (horse) pasture within and to the west of Easton Park.

Farms of ancient origin can be found within the Easton and Glevering Estate Claylands, such as Bentries Farm in Easton. The current 18th century house was built on an island within an ancient moat that dates to the medieval period. The area provides an example of the late 1800s trend for ornate 'Model Farms' such as Easton Farm Park – today a farm museum and visitor centre. This has attractive brick and weather boarded buildings with ornate white painted timber edgings. Such farmsteads tend to enhance the landscape.

The south of the neighbourhood area falls within the Deben Valley, which is the longest and most complex of all Suffolk Coastal river valleys. The valley is sinuous and the course of the river on the valley floor is strongly meandering. The central section of the valley has notably little public access to the flood plain, which is believed to be a result of estate control of land in the zone around Easton and Gleveringham. Visual experience varies but is overall very scenic with a strong sense of traditional rural heritage and settlement pattern. Downstream, the wide flood plain's water meadows maintain a traditional and historic character. In the neighbourhood area, the views are enclosed by plantation woodland.

### Tree preservation orders

Implemented by local planning authorities, Tree Preservation Orders (TPOs) are designated to protect specific trees, groups of trees, or woodlands in the interests of their amenity value. When considering 'amenity' the local planning authority will likely take into consideration the following criteria<sup>28</sup>:

- Visibility: the extent to which the trees or woodlands can be seen by the public.
- Individual, collective, and wider impact: considering the importance of the trees or woodlands in relation to their cultural or historic value, contribution to and relationship with the landscape, and/or their contribution to the character or appearance of a conservation area.

East Suffolk Council have designated numerous TPOs in the interest of their amenity value, including several within the neighbourhood area. As shown in **Figure B4.1**, this includes a large area of trees, small group of trees, and 10 individual trees in the centre of Easton, as well as a woodland adjacent to the Cricket Ground.

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<sup>28</sup> GOV.UK (2014): 'Tree Preservation Orders – General', [online] available to access via [this link](#)



**Figure B4.1 TPOs in the neighbourhood area<sup>29</sup>**

### Visual amenity

It is useful to note that the views across the neighbourhood area are also an important consideration in the planning process as the scale, height and mass of development can ultimately impact important views if they are not considered and assessed through the process. Changes, such as development and landscape change, can see these views degraded overtime.

### Future baseline

New development has the potential to lead to incremental changes in landscape quality in and around the neighbourhood area. In the absence of the ENP, more speculative development may come forward within the open countryside or countryside setting, which could place increased pressure on local settings. This may negatively impact upon the landscape and villagescape features which contribute to the distinctive character of the neighbourhood area.

Locally distinctive landscape and villagescape features, characteristics and special qualities can be protected, managed, and enhanced through the ENP. New development that is appropriately designed and landscape-led has the potential to support the area's inherent landscape character and quality. This may, for example, include regeneration and brownfield development that improves the village setting, delivering green infrastructure improvements and/or new recreational opportunities and enhanced framing of key views.

### Key issues

Following the consideration of the baseline information and policy context review, the following key issues within the neighbourhood area are identified in relation to landscape:

- The Suffolk Coastal Landscape Character Assessment identifies two landscape character areas that fall within the neighbourhood area. These are the Easton and Glevering Estate Claylands and the Deben Valley. Low density development

<sup>29</sup> East Suffolk Council (2021): 'Tree Preservation Orders (TPO)s', [online] available to access via [this link](#)

and building vernacular are key aspects identified as contributing to the character of these landscape areas, which can be promoted design aspects / protected in plan-making.

- East Suffolk Council have designated numerous TPOs in the interest of their amenity value, including several within the neighbourhood area. This includes a large area of trees, small group of trees, and 10 individual trees in the centre of Easton, as well as a woodland adjacent to the Cricket Ground. These TPOs contribute to the landscape and character of the neighbourhood area, which is why they have been offered protection.
- New development has the potential to lead to incremental change in landscape and villagescape character, and visual amenity.

## B.5 Historic environment

### Policy context

**Table B5.1** below presents the most relevant documents identified in the policy review for the purposes of the Neighbourhood Plan SEA.

**Table B5.1 Plans, policies and strategies reviewed in relation to the historic environment**

Document title	Year of publication
<a href="#">National Planning Policy Framework (NPPF)</a>	2021
<a href="#">The 25 Year Environment Plan</a>	2018
<a href="#">The National Design Guide</a>	2019
<a href="#">National Model Design Code</a>	2021
<a href="#">Historic England Advice Note 1: Conservation Area Appraisal, Designation and Management</a>	2019
<a href="#">Historic England Advice Note 3: The Setting of Heritage Assets</a>	2017
<a href="#">Historic England Advice Note 8: Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)</a>	2016
<a href="#">Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans</a>	2015
<a href="#">Suffolk Coastal Local Plan</a>	2020

The key messages emerging from the review are summarised below:

- The key high-level principles for the conservation and enhancement of the historic environment are as follows:
  - The historic environment is a shared resource.
  - Everyone should be able to participate in sustaining the historic environment.
  - Understanding the significance of places is vital.
  - Significant places should be managed to sustain their values.
  - Decisions about change must be reasonable, transparent, and consistent.
  - Documenting and learning from decisions is essential.
- The significance of places is the key element which underpins the conservation and enhancement of the historic environment. Significance is a collective term for the sum of all the heritage values attached to a place, be it a building, an archaeological site, or a larger historic area such as a whole village or landscape.
- The ENP will be required to be in general conformity with the NPPF, which ultimately seeks to conserve and enhance historic environment assets in a manner appropriate to their significance. The NPPF seeks planning policies and decisions which are sympathetic to local character and history without preventing or discouraging appropriate innovation of change. The NPPF supports the use of area-based character assessments, design guides and codes and

masterplans to help ensure that land is used efficiently while also creating beautiful and sustainable places.

- As set out in the NPPF, it should be ensured that the design of streets, parking areas, other transport elements, and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code. Design Codes can set out a necessary level of detail in sensitive locations, for example, with heritage considerations, and they can set out specific ways to maintain local character.
- Planning Practice Guidance expands on the NPPF recognising the proactive rather than passive nature of conservation.
- The role of the historic environment, as part of healthy and thriving ecosystems, landscapes, and cultural values, including settlement identity, is reiterated through the key messages of the 25 Year Environment Plan and National Design Guide.
- Historic England's Advice Notes provide further guidance in relation to the conservation and enhancement of the historic environment. Of relevance for the ENP is the emphasis on the importance of:
  - Understanding the different types of special architectural and historic interest which underpin designations, as well as how settings and/or views contribute to the significance of heritage assets.
  - Recognising the value of implementing controls through neighbourhood plans, conservation area appraisals, and management plans.
  - Appropriate evidence gathering, including clearly identifying those issues that threaten an area or assets character or appearance, and that merit the introduction of management measures.
- In addition to conserving the historic environment, the ENP should seek to identify opportunities to enhance the fabric and setting of the historic environment. It should also seek to rejuvenate features and areas which are at risk of neglect and decay.
- The ENP will also be required to be in general conformity with the relevant policies outlined in the Suffolk Coastal Local Plan, including:
  - Policy SCLP11.3: Historic Environment.
  - Policy SCLP11.4: Listed Buildings.
  - Policy SCLP11.5: Conservation Areas.
  - Policy SCLP11.6: Non-Designated Heritage Assets.
  - Policy SCLP11.8: Parks and Gardens of Historic or Landscape Interest.
- The Council will work with partners, developers, and the community to conserve and enhance the historic environment and to ensure that, where possible, development makes a positive contribution to the historic environment. The policies of the NPPF will be applied in respect of designated and non-designated heritage assets.

## Baseline summary

### Designated heritage assets and areas

The neighbourhood area has a rich historic environment, recognised through several designated heritage assets and areas. This includes one Grade I listed building, 30 Grade II listed buildings, one scheduled monument, and the Easton Conservation Area (see **Figure B5.1**). Further detail on these assets is provided below.

### Listed buildings

Listed buildings are nationally designated buildings which are protected through the Listed Buildings and Conservation Areas Act 1990<sup>30</sup>. According to the National Heritage List for England, the neighbourhood area contains one Grade I listed building and 30 Grade II listed buildings.

The Grade I listed building, the Church of All Saints, is a medieval parish church dating back to the 13th Century and restored in the late 1880s<sup>31</sup>. Notably, Grade I listed buildings are the rarest form of listed building and therefore have a higher significance than the other grades.

### Scheduled monuments

The Ancient Monuments and Archaeological Areas Act (1979) allows the investigation, presentation and recording of matters of archaeological or historical interest and makes provision for the regulation of operations or activities which may affect ancient monuments and archaeological areas. Scheduled Monuments are nationally designated sites which are protected under the Act.

There is one scheduled monument in the neighbourhood area, which is the moated site at Bentries Farm. Around 6,000 moated sites are known in England<sup>32</sup>. They consist of wide ditches, often or seasonally water-filled, partly or completely enclosing one or more islands of dry ground on which stood domestic or religious buildings. The peak period during which moated sites were built was between about 1250 and 1350 and by far the greatest concentration lies in central and eastern parts of England. They form a significant class of medieval monument and are important for the understanding of the distribution of wealth and status in the countryside.

The moated site at Bentries Farm exhibits well preserved earthworks and the greater part of the island is unencumbered by buildings. It will retain important archaeological information concerning the construction and use of the site, and organic material will be preserved in waterlogged deposits in the moat. The monument includes a sub-rectangular moated site located on a hill overlooking the village of Easton and the valley of the River Deben to the southwest.

### Conservation areas

Conservation areas are designated because of their special architectural and historic interest. Conservation area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and providing a greater understanding and articulation of its character and significance - mentioned within

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<sup>30</sup> Planning (Listed Buildings and Conservation Areas) Act (1990) [online] available to access via [this link](#)

<sup>31</sup> Historic England (2021): 'Church of All Saints', [online] available to access via [this link](#)

<sup>32</sup> Historic England (2021): 'Moated site at Bentries Farm', [online] available to access via [this link](#)

the 'Conservation Area Designation, Appraisal and Management' advice note by Historic England<sup>33</sup>.

The Easton Conservation Area covers a large proportion of the village. The area was originally designated by East Suffolk Council in 1972 and confirmed by re-designation by Suffolk Coastal District in 1991.

The Easton Conservation Area Appraisal (2014)<sup>34</sup> identifies the overall character of Easton is very much one of a picturesque old Suffolk village which retains its traditional form and appearance. Despite some intrusive 20th Century development and some small-scale incremental change having taken place, the village continues to retain the special characteristics which strongly justify its conservation area designation.

The Appraisal highlights that inappropriate new development, and the cumulative effect of increment change, are a constant threat to the special architecture and historic interest of the Conservation Area. Detrimental change can take many forms, from infill with poorly designed new houses to modern replacement windows in old buildings. New development should respect the grain of the conservation area, including preservation of building lines, relationship to gardens, streets, parking and farmland, scale, density and uses.

### Locally important heritage features

It should be noted that not all the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life – whether at home, work, or leisure. Although not designated, many buildings and areas are of historic interest and are important to local communities. For example, open spaces and key distinctive buildings are likely to have a local historic value.

Under Policy SCLP11.8 (Parks and Gardens of Historic or Landscape Interest), the Suffolk Coastal Local Plan has given several historic parklands the status of Non-Designated Heritage Assets. This includes Easton Park, within the neighbourhood area, and Glevering Hall Park, southeast of the neighbourhood area.

A separate assessment of the buildings and features that make a “*positive contribution*” to the neighbourhood area has been prepared and published as a supporting document to the draft ENP. The purpose of the assessment was to ascertain whether any of these buildings would satisfy the Non-Designated Heritage Assets criteria. 20 have been found to meet these criteria, which are:

- 1-2 Pound Cottages, Pound Corner.
- 3-4 Pound Cottages, Pound Corner.
- 5-6 Pound Cottages, Pound Corner.
- 7-8 Pound Cottages, Pound Corner.
- The Stables, The Street.
- Former Carriage House, The Street.

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<sup>33</sup> Historic England (2016): 'Conservation Area Designation, Appraisal and Management Advice Note 1', [online] available to access via [this link](#)

<sup>34</sup> East Suffolk Council (2019): 'Conservation area appraisals', [online] available to access via [this link](#)



- Octagon House, The Street.
- Ivy Cottage and White Horse PH outbuildings, The Street.
- Almond Tree Cottage, The Street.
- Rosemary Cottage, The Street.
- Pump House and Lavender Cottage, The Street.
- The Old Post Office, The Street.
- Rose Villa, The Street.
- Easton Primary School, The Street.
- Little Willows, The Street.
- Old Kingdom Hall, The Street.
- Double Bungalow, The Street.
- The Village Hall, The Street.
- 1-3 School Lane.
- Rose Cottage and Sunnyside, School Lane.

The Suffolk Historic Environment Record (HER) identifies the important distinctive structures or features that positively contribute to local distinctiveness and sense of place. A search of the HER (accessed via the Heritage Gateway<sup>35</sup>) produces over 41 records for the neighbourhood area.

During the subsequent stages of the SEA process (where appropriate, and subject to the availability of such information), the Suffolk HER will be reviewed in greater detail to determine the potential impacts to non-designated heritage features resulting from the provisions within the ENP.

### Heritage at risk

Since 2008, Historic England has released an annual Heritage at Risk Register. The Register highlights the Grade I and Grade II\* listed buildings, scheduled monuments, historic parks and gardens, registered battlefields, wreck sites and conservation areas deemed to be 'at risk'. Within the neighbourhood area, there are no designated heritage assets or areas on the Heritage at Risk Register.

It is important to note that the Heritage at Risk Register does not contain information about the status of Grade II listed buildings for areas outside of London. As such, it is currently not possible to determine whether any of the Grade II listed buildings within the neighbourhood area are at risk.

Encouraging and facilitating improvements to the condition of heritage assets within the neighbourhood area is recognised as an opportunity for the ENP.

### Future baseline

New development in the neighbourhood area has the potential to impact on the fabric and setting of heritage assets; for example, through inappropriate design and layout, and increasing the impacts of traffic within conservation areas. It should be

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<sup>35</sup> Heritage Gateway (2021): 'Quick Search', [online] available to access via [this link](#)

noted, however, that existing legislation, the NPPF, and the Suffolk Coastal Local Plan offer a degree of protection to heritage assets and their settings.

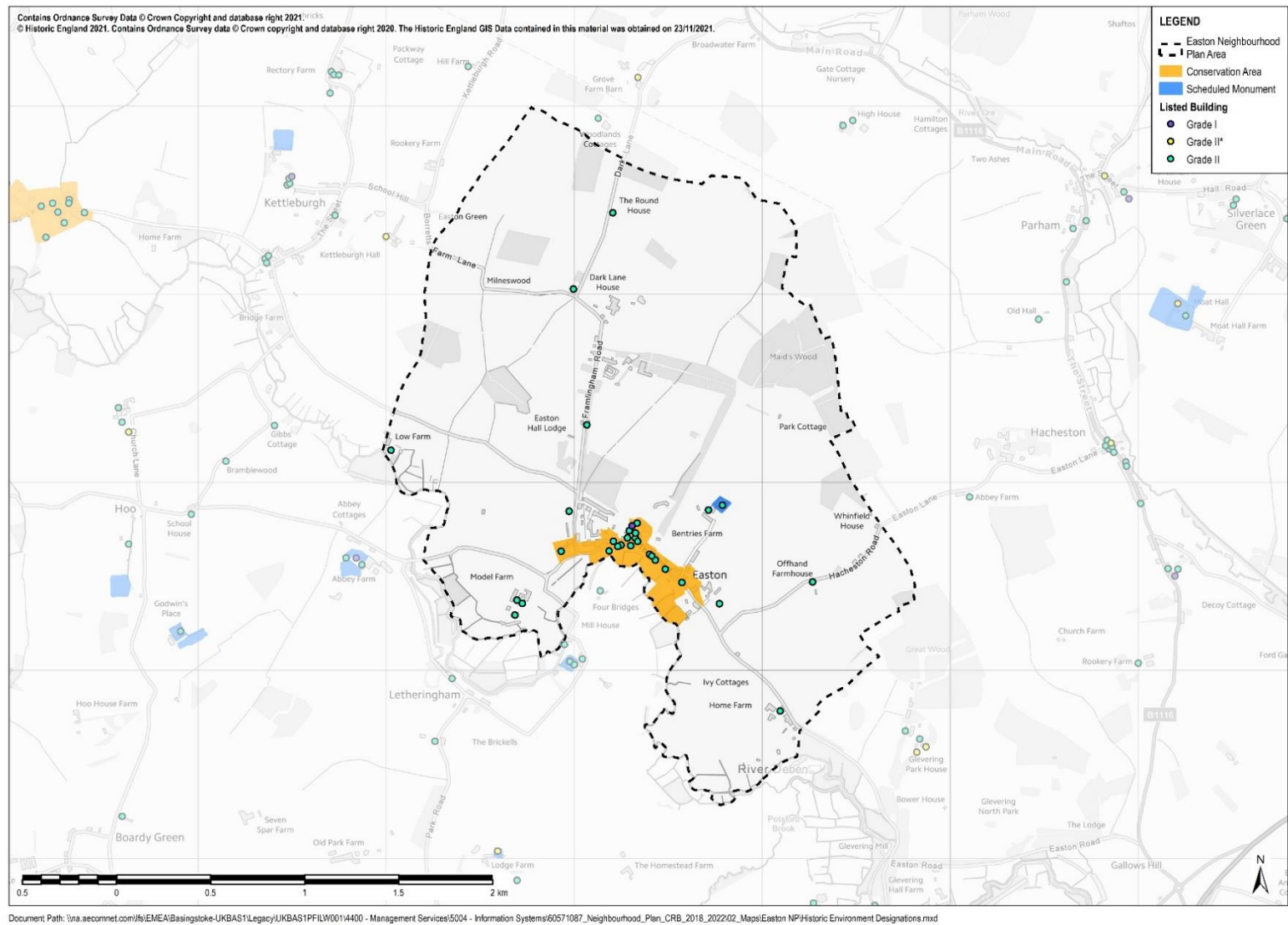
New development need not be harmful to the significance of a heritage asset, and in the context of the neighbourhood area there may be opportunity for development to enhance the historic setting of the settlements within the area, support historic landscape character, and better reveal the significance of assets and their settings.

## Key issues

Following the consideration of the baseline information and policy context review, the following key issues within the neighbourhood area are identified in relation to the historic environment:

- The neighbourhood area contains a wealth of designated heritage assets, including one Grade I listed building, 30 Grade II listed buildings, and one scheduled monument. It is vital that these assets are conserved as they contribute significantly to the historic value of the neighbourhood area.
- The Easton Conservation Area covers a large proportion of the village, and despite some intrusive 20th Century development and small-scale incremental change having taken place, the village continues to retain the special characteristics. As such, future development within or in the setting of the Conservation Area should be sensitive in its design.
- The draft ENP has identified 20 Non-Designated Heritage Assets that make a “*positive contribution*” to the neighbourhood area. These assets are still significant, despite their non-designated status, and should be protected as they hold value to the local community.
- There are over 41 records for the neighbourhood area on the Historic Environment Record (HER), including important distinctive structures and features. During the subsequent stages of the SEA process (where appropriate, and subject to the availability of such information), the Suffolk HER will be reviewed in greater detail to determine the potential impacts to non-designated heritage features resulting from the provisions within the ENP.
- It will be important to ensure that future development avoids / minimises impacts upon the historic environment and maximises opportunities to improve the public realm and green infrastructure, to the indirect benefit of heritage settings.

Figure B5.1 Conservation areas, scheduled monuments and listed buildings within the neighbourhood area



## B.6 Land, soil and water resources

### Policy context

**Table B6.1** below presents the most relevant documents identified in the policy review for the purposes of the Neighbourhood Plan SEA.

**Table B6.1 Plans, policies and strategies reviewed in relation to land, soil and water resources**

Document title	Year of publication
<a href="#">National Planning Policy Framework (NPPF)</a>	2021
<a href="#">The 25 Year Environment Plan</a>	2018
<a href="#">Safeguarding our Soils: A strategy for England</a>	2009
<a href="#">Future Water: The government's water strategy for England</a>	2011
<a href="#">Water for Life</a>	2011
<a href="#">The National Waste Management Plan</a>	2013
<a href="#">Suffolk Coastal Local Plan</a>	2020
<a href="#">Suffolk Minerals and Waste Local Plan</a>	2020

The key messages emerging from the review are summarised below:

- The ENP will be required to be in general conformity with the NPPF, which seeks to protect high quality soil resources and improve the water environment, recognising the wider benefits of natural capital, and derived from ecosystem services. Furthermore, the NPPF recognises the need to take account of the long-term implications of climate change and build resilience in this respect. The NPPF encourages efficient land use, utilising brownfield land opportunities and land remediation schemes where appropriate and delivering environmental gains.
- The 25-year Environment Plan presents a focus for environmental improvement in the next couple decades, with aims to achieve clean air, clean and plentiful water, and reduced risk from environmental hazards. This includes measures to improve soil quality, restore and protect peatlands, use water more sustainably, reduce pollution, maximise resource efficiency and minimise environmental impacts. This leads on from and supports the soil strategy for England (Safeguarding our Soils) which seeks to ensure that all England's soils will be managed sustainably, and degradation threats tackled successfully by 2030, as well as the national water strategies which seek to secure sustainable and resilient water resources and improve the quality of waterbodies, and the national waste plan which seeks to identify measures being taken to move towards a zero-waste economy.
- The ENP will be required to be in general conformity with the Suffolk Minerals and Waste Local Plan, which contains planning policies for determining planning applications for minerals and waste development, as well as safeguarding the same from other forms of competing development.
- The ENP will also be required to be in general conformity with the relevant policies outlined in the Suffolk Coastal Local Plan, including:

- Policy SCLP3.5: Infrastructure Provision.
- Policy SCLP9.2: Sustainable Construction.
- Policy SCLP10.3: Environmental Quality.
- Development proposals will be expected to protect the quality of the environment and to minimise and, where possible, reduce all forms of pollution and contamination. Development proposals will be considered in relation to impacts on:
  - Soil and loss of agricultural land.
  - Land contamination and its effects on sensitive land uses.
  - Water quality and the achievement of Water Framework Directive objectives.
  - Light pollution.
  - Noise pollution.

## Baseline summary

### Soil resources

The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural land' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' (BMV) land and Grades 3b to 5 of poorer quality. In this context, there is a need to avoid loss of higher quality BMV agricultural land.

As shown in **Figure B6.1** overleaf, the neighbourhood area is predominantly underlain by Grade 3 (Good to Moderate) and Grade 2 (Very Good) agricultural land<sup>36</sup>. However, in the absence of a detailed assessment at this location, it is currently not possible to determine whether the Grade 3 agricultural land in the neighbourhood area is Grade 3a (i.e., BMV land) or Grade 3b (poorer quality). There is also some Grade 4 (Poor) agricultural land in the neighbourhood area, which largely follows the path of the River Deben.

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<sup>36</sup> Natural England (2011): 'Agricultural Land Classification map Eastern Region (ALC008)' [online] available to access via [this link](#)



**Figure B6.1 ALC and BMV classification in the neighbourhood area**

Also shown in **Figure B6.1** are the results of the predictive BMV land assessment for East of England<sup>37</sup>. The results show that most of the undeveloped areas of land in the neighbourhood area have a Moderate (20-60% area BMV) to High (>60% area BMV) likelihood of being underlain by BMV agricultural land. Following a similar pattern to the ALC, the land following the path of the River Deben has a Low (<20% area BMV) likelihood of being underlain by BMV agricultural land.

Easton falls within a Minerals Consultation Area. Policy MP10 (minerals consultation and safeguarding areas) within the Suffolk Minerals and Waste Local Plan states that “District and Borough Councils should consult the County Council when a proposal falls within the Minerals Consultation Area”.

### Water resources and quality

The neighbourhood area is located within the Deben Operational Catchment, or more specifically within the Deben (Brandeston Bridge – Melton) Water Body catchment area. As mentioned under the Climate Change theme, the southern boundary of the neighbourhood area follows the River Deben.

As shown on the Environment Agency’s Catchment Data Explorer<sup>38</sup>, the most recently completed water quality assessments undertaken in 2019 classifies the Deben Water Body as having a ‘moderate ecological status’. In terms of physico-chemical quality elements, the Deben is marked as ‘bad’ for dissolved oxygen. The Deben also does not support good hydrological regime. In terms of chemical properties, the Deben failed on priority hazardous substances due to the presence of high levels of mercury and its compounds, nonylphenol, and perfluorooctane sulphonate (PFOS).

<sup>37</sup> Natural England (2017): ‘Likelihood of Best and Most Versatile (BMV) Agricultural Land – Strategic scale map Eastern Region (ALC020)’, [online] available to access via [this link](#)

<sup>38</sup> Environment Agency (2021): ‘Deben (Brandeston Bridge – Melton) Water Body’, [online] accessible via [this link](#)



Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply<sup>39</sup>. The entire neighbourhood area falls within a Zone III (Total Catchment) SPZ.

Nitrate Vulnerable Zones (NVZs)<sup>40</sup> denote areas at risk from agricultural nitrate pollution and the neighbourhood area falls within the Deben Surface Water NVZ. NVZs identify rules in relation to the use of fertilisers and manures as well as a requirement to prevent water pollution from farm areas.

Easton also falls within a Waste Water Treatment Plants Safeguard Area.

## Future baseline

Future development has the potential to affect water resources and quality through increased consumption, diffuse pollution, waste-water discharges, water run-off, and modification. However, water companies are likely to maintain adequate water supply and wastewater management over the plan period, and the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality within the neighbourhood area. It will be important for new development to avoid negative impacts on water quality and to contribute to reducing consumption and improving efficiency where possible.

Given the presence of BMV land within parts of the neighbourhood area, new development areas have the potential to result in the permanent loss of productive agricultural land. In this respect, the ENP should seek to retain greenfield land and make best use of brownfield sites for development, though it is important to note that this is dependent on the availability of such sites.

It is unlikely that the small-scale development being proposed through the ENP will have a significant impact on the wider area's NVZ designation given the strategic scale of the overall NVZ. Additionally, a large source of detriment to NVZ comes from agricultural use, which is not anticipated to be brought forward through the ENP.

## Key issues

Following the consideration of the baseline information and policy context review, the following key issues within the neighbourhood area are identified in relation to land, soil, and water resources:

- According to the ALC, the neighbourhood area is predominantly underlain by Grade 3 (Good to Moderate) and Grade 2 (Very Good) agricultural land. There is also some Grade 4 (Poor) agricultural land in the neighbourhood area, which largely follows the path of the River Deben.
- Most of the undeveloped areas of land in the neighbourhood area have a Moderate (20-60% area BMV) to High (>60% area BMV) likelihood of being underlain by BMV agricultural land. Following a similar pattern to the ALC, the land following the path of the River Deben has a Low (<20% area BMV) likelihood of being underlain by BMV agricultural land. Plan-making should therefore prioritise brownfield land where possible, and where this is not possible, greenfield sites with lower quality agricultural land should be prioritised.

<sup>39</sup> GOV.UK (2017): 'Groundwater Protection', [online] available to access via [this link](#)

<sup>40</sup> GOV.UK (2021): 'Nitrate Vulnerable Zones', [online] available to access via [this link](#)



- The neighbourhood area is located within the Deben Operational Catchment, or more specifically within the Deben (Brandeston Bridge – Melton) Water Body catchment area, which has been defined as having a 'moderate ecological status'. Moreover, the entire neighbourhood area falls within a Zone III (Total Catchment) SPZ and the Deben Surface Water NVZ. Consequently, there is a need to protect and improve ecological water quality and ensure development does not negatively impact water quality.
- Plan making should consider how local decisions affect water supply, such as water accessibility issues, and ensure that appropriate drainage infrastructure is in place to accommodate new development areas.

## B.7 Community wellbeing

### Policy context

**Table B7.1** below presents the most relevant documents identified in the policy review for the purposes of the Neighbourhood Plan SEA.

**Table B7.1 Plans, policies and strategies reviewed in relation to community wellbeing**

Document title	Year of publication
<a href="#">National Planning Policy Framework (NPPF)</a>	2019
<a href="#">National Planning Practice Guidance – Healthy and Safe Communities</a>	2019
<a href="#">The 25 Year Environment Plan</a>	2018
<a href="#">Health Equity in England: The Marmot Review 10 Years On</a>	2020
<a href="#">Planning for Sport Guidance</a>	2019
<a href="#">Suffolk Coastal Local Plan</a>	2020
<a href="#">Suffolk Joint Health and Wellbeing Strategy</a>	2019

The key messages emerging from the review are summarised below:

- The ENP will be required to be in general conformity with the NPPF, which overall seeks to retain and enhance access to community services and facilities, including health facilities, educational facilities, and open space. The NPPF recognises the benefits of a range of local provisions supporting community needs, including in rural areas. The framework seeks to protect settlement and community identities. Furthermore, the NPPF recognises the benefits of creating cohesive communities, in safe environments where crime and the fear of crime do not undermine the quality of life of residents.
- The NPPF recognises the role of development plans in helping to deliver access to high quality open spaces and opportunities for sport and physical activity which contribute to the health and wellbeing of communities. The health benefits of access to nature, green spaces and green infrastructure are further reiterated through the 25-year Environment Plan.
- The 2020 Health Equity in England Report identifies that the health gap between less and more deprived areas has grown in the last decade, where more people can expect to spend more of their lives in poor health, and where improvements to life expectancy have stalled, or even declined.
- The Planning for Sport Guidance seeks to help the planning system provide formal and informal opportunities for everyone to take part in sport and be physically active. The Guidance outlines 12 'planning-for-sport' principles.
- The ENP will also be required to be in general conformity with the relevant policies outlined in the Suffolk Coastal Local Plan, including:
  - Policy SCLP8.1: Community Facilities and Assets.
  - Policy SCLP8.2: Open Space.
  - Policy SCLP8.3: Allotments.

- Policy SCLP10.1: Biodiversity and Geodiversity.
- Policy SCLP11.2: Residential Amenity.
- The vision of the Suffolk Joint Health and Wellbeing Strategy outlines that *“people in Suffolk live healthier, happier lives”* and aims to *“narrow the differences in healthy life expectancy between those living in our most deprived communities and those who are more affluent through greater improvements in more disadvantaged communities”*.

## Baseline summary

### Population and age structure

The population of the neighbourhood area stood at 331 at the time of the 2011 census<sup>41</sup>. According to 2020 population estimates, the population of the neighbourhood area has increased to 375, which represents a 13.3% increase.

The gender breakdown for the neighbourhood area stands at 50.7% female and 49.3% male, marking a relatively even gender balance. In comparison, the gender breakdown for East Suffolk stands at 51.4% female and 48.6% male<sup>42</sup>.

In terms of age breakdown, 20.5% of the population in the neighbourhood area is aged 0 to 17 years, 54.4% is aged 18-64, and 25.1% is aged 65+ years. The Office of National Statistics (ONS) figures<sup>43</sup> suggest that there will be an additional 7.5 million people aged 65+ in the UK in 50 years' time.

### Index of Multiple Deprivation

The Index of Multiple Deprivation 2019 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).
- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- **Education, Skills and Training:** The lack of attainment and skills in the local population.
- **Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability, and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
- **Crime:** The risk of personal and material victimisation at local level.

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<sup>41</sup> City Population (2021): 'Easton', [online] available to access via [this link](#)

<sup>42</sup> City Population (2021): 'East Suffolk', [online] available to access via [this link](#)

<sup>43</sup> ONS (2021): 'Overview of the UK population: January 2021', [online] available to access via [this link](#)

- **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
  - ‘Geographical Barriers’: relating to the physical proximity of local services
  - ‘Wider Barriers’: relating to access to housing, such as affordability.
- **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
  - ‘Indoors Living Environment’ measures the quality of housing.
  - ‘Outdoors Living Environment’ measures air quality and road traffic accidents.
- Two supplementary indices (subsets of the Income deprivation domains), are also included:
  - **Income Deprivation Affecting Children Index:** The proportion of all children aged 0 to 15 living in income deprived families.
  - **Income Deprivation Affecting Older People Index:** The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs)<sup>44</sup> are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales.

The neighbourhood area is within the Suffolk Coastal 002A LSOA which is ranked 19,396 out of the 32,844 LSOAs in England for the IMD. This is amongst the 50% least deprived neighbourhoods in the country for this category.

Conversely, for the ‘Barriers to Housing and Services Domain’, this LSOA ranked 3,420 out of 32,844 LSOAs in England. This is amongst the 20% most deprived neighbourhoods in the country for this category and shows that physical and financial accessibility of housing and local services is poor in the neighbourhood area when compared to England.

Similarly, for the ‘Living Environment Deprivation Domain’, this LSOA ranked 852 out of 32,844 LSOAs in England. This is amongst the 10% most deprived neighbourhoods in the country for this category and shows that the quality of the local environment is poor in the neighbourhood area when compared to England.

Suffolk Coastal 002A is one of 146 LSOAs in the East Suffolk local authority district. Using the IMD rank of average summary measure, this local authority ranked 158 in 2019, out of 317 local authorities.

### Housing tenure

The following information was determined following a local Household Survey in the neighbourhood area:

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<sup>44</sup> DCLG (2019): ‘Indices of Deprivation Explorer’, [online] available to access via [this link](#)

- 75% of respondents felt there was a need for small houses (1 or 2 bed) for purchase.
- 58% of respondents indicated support for affordable housing.
- 41% of respondents indicated support for retirement or sheltered housing.
- 40% felt there was a need for housing for rent.
- 36% of respondents felt there was a need for large houses (3+ bed) to purchase.
- 22% of respondents felt there was a need for flats (1 or 2 bed) for purchase or rent.
- Only 19% felt there was a need for care homes.

### **Community assets and infrastructure**

The following service, facilities, and amenities can be found within the neighbourhood area, mainly concentrated in the village of Easton:

- White Horse Easton (public house).
- Easton Farm Park (farm visitor centre, tourist attraction).
- The Bennett Kings (lodging).
- All Saints' Church Easton.
- Easton Primary School.
- Wilderness Park Flowers (online florist).
- Ho'ih Living (online homeware shop).
- Easton Farm Park Campsite.
- Martley Hall STUD (equestrian centre).
- Easton Grange Wedding Venue Suffolk.

A greater variety of services, facilities and amenities is available within the neighbouring towns of Wickham Market and Framlingham.

### **Green infrastructure networks**

Access to the nation's gardens, parks, woodlands, and rivers have played a huge part in helping people through the pandemic. Almost nine in ten adults surveyed in England reported that being in nature makes them very happy and nearly three quarters of adults were concerned about biodiversity loss in England<sup>45</sup>. The research also revealed the importance of local parks and green spaces to the nation's mental and physical wellbeing.

The NPPF enables the designation and protection of land of particular importance to local communities as Local Green Spaces (LGS) in Neighbourhood Plans. Such designations rule out new development on them other than in very special circumstances. A separate Local Green Space Appraisal has been undertaken as part of the preparation of the Neighbourhood Plan, and proposes the following spaces for LGS designation:

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<sup>45</sup> Natural England (2020): 'People and Nature Survey', [online] available to access via [this link](#)

- Village Green.
- Village and Highway verges.
- Informal play area adjacent to Hunt Kennels.
- Informal Green Space and signpost, Pound Corner.
- Easton closed cemetery green space around St Andrews Church.
- Easton Parish Council private open cemetery.

## Future baseline

As the population of the neighbourhood area continues to age, this could potentially have a negative impact upon the future vitality of the local community in certain parts of the area, whilst also placing additional pressures to existing services and facilities.

The suitability (e.g., size and design) and affordability of housing for local requirements depends on the implementation of appropriate housing policies throughout the ENP. Unplanned development may have wider implications in terms of transport and access to infrastructure, or the natural environment.

The importance of local services and facilities, and access to open green spaces and recreational areas has been further highlighted through the ongoing pandemic. These factors are more likely to be appropriately considered and addressed through planned development rather than unplanned development.

The Covid-19 pandemic has also changed the way people work and shop. For many people, working from home is likely to continue to form part of a more flexible approach.

## Key issues

Following the consideration of the baseline information and policy context review, the following key issues within the neighbourhood area are identified in relation to community wellbeing:

- According to 2020 population estimates, the population of the neighbourhood area stands at 375. The 44 new dwellings proposed for the area will result in a significant increase in the population, and the potential to therefore affect community identity and cohesion.
- Based on the 2019 IMD data, the Suffolk Coastal 002A LSOA is amongst the 50% least deprived neighbourhoods in the country. However, for the 'Barriers to Housing and Services Domain' this LSOA is amongst the 20% most deprived neighbourhoods in the country, and for the 'Living Environment Deprivation Domain' this LSOA is amongst the 10% most deprived neighbourhoods in the country. It is important that the ENP supports improvements in relation to these barriers.
- Following a household survey in the neighbourhood area, it was found that 75% of respondents felt there was a need for small houses (1 or 2 bed) for purchase, and 58% of respondents indicated support for affordable housing. Proposed development in the neighbourhood area should seek to address this demand.

- The services, facilities, and amenities within the neighbourhood area supports community vitality and the quality of life of residents, with the availability of community assets essential for continued growth within the area.
- As the requirements of the working population continue to change, particularly in response to the Covid-19 pandemic, there is likely to be a requirement for adaptable dwellings which can accommodate more flexible working practices.



## B.8 Transportation

### Policy context

**Table B8.1** below presents the most relevant documents identified in the policy review for the purposes of the Neighbourhood Plan SEA.

**Table B8.1 Plans, policies and strategies reviewed in relation to transportation**

Document title	Year of publication
<a href="#">National Planning Policy Framework (NPPF)</a>	2021
<a href="#">The Transport Investment Strategy – Moving Britain Ahead</a>	2017
<a href="#">Suffolk Coastal Local Plan</a>	2020
<a href="#">Suffolk Local Transport Plan</a>	2011
<a href="#">Suffolk Green Access Strategy</a>	2020

The key messages emerging from the review are summarised below:

- The ENP will be required to be in general conformity with the NPPF, which seeks the consideration of transport issues from the earliest stages of plan-making and development proposals to address any known issues and maximise opportunities to increase accessibility, particularly by walking, cycling and public transport. Larger developments are expected to be delivered in areas which are or can be made sustainable by limiting the need to travel and offering a genuine choice of transport modes. However, it is recognised that sustainable transport solutions will vary between urban and rural environments.
- National transport strategies set out investment priorities which ultimately all seek to improve the connectivity, effectiveness and reliability of transport networks, whilst reducing impacts on the natural environment (including through decarbonisation). Furthermore, they place great emphasis on making cycling and walking the natural choice for shorter journeys, or as part of a longer journeys. This includes investment in new and upgraded infrastructure, changing perceptions, and increasing safety.
- The ENP will also be required to be in general conformity with the relevant policies outlined in the Suffolk Coastal Local Plan, including:
  - Policy SCLP7.1: Sustainable Transport.
  - Policy SCLP7.2: Parking Proposals and Standards.
- Development proposals should be designed from the outset to incorporate measures that will encourage people to travel using non-car modes to access home, school, employment, services, and facilities. Development will be supported where:
  - Any significant impacts on the highways network are mitigated.
  - It is proportionate in scale to the existing transport network.
  - All available opportunities to enable and support travel on foot, by cycle or public transport have been considered and taken.

- It is located close to and provides safe pedestrian and cycle access to services and facilities.
  - It is well integrated into and enhances the existing cycle network, including the safe design and layout of new cycle routes and provision of covered, secure cycling parking.
  - It is well integrated into, protects and enhances the existing pedestrian routes and the public rights of way network.
  - It reduces conflict between users of the transport network including pedestrians, cyclists, users of mobility vehicles and drivers, and does not reduce road safety.
  - The cumulative impact of new development will not create severe impacts on the existing transport network.
- The Suffolk Local Transport Plan (2011-2031) sets out Suffolk County Council's long-term transport strategy for the next 20 years. The Plan seeks to *“maintain and, over time, improve Suffolk’s transport networks, reduce congestion, and improve access to jobs and markets”*. The Plan shows how transport will play its part in supporting and facilitating future sustainable economic growth by:
    - Maintaining (and in the future improving) transport networks.
    - Tackling congestion.
    - Improving access to jobs and markets.
    - Encouraging a shift to more sustainable travel patterns.
  - The Suffolk Green Access Strategy sets out a vision *“to get more people using and enjoying Suffolk’s green access network”*. The Strategy focuses on how green access can benefit quality of life and how it can contribute to the council’s corporate priorities.

## Baseline summary

### Rail network

There are no train stations within the neighbourhood area, and the closest available train station is Wickham Market in Campsea Ashe, 3.2 kilometres east of Wickham Market itself. This station is run by Abellio Greater Anglia and serviced by Greater Anglia. The station is on the East Suffolk Line which runs between Lowestoft and Ipswich, which offer connections to London Liverpool Street.

### Bus network

Buses do not serve the village of Easton and as such there is no public transport link to connect nearby settlements or enable commuting to Wickham Market train station.

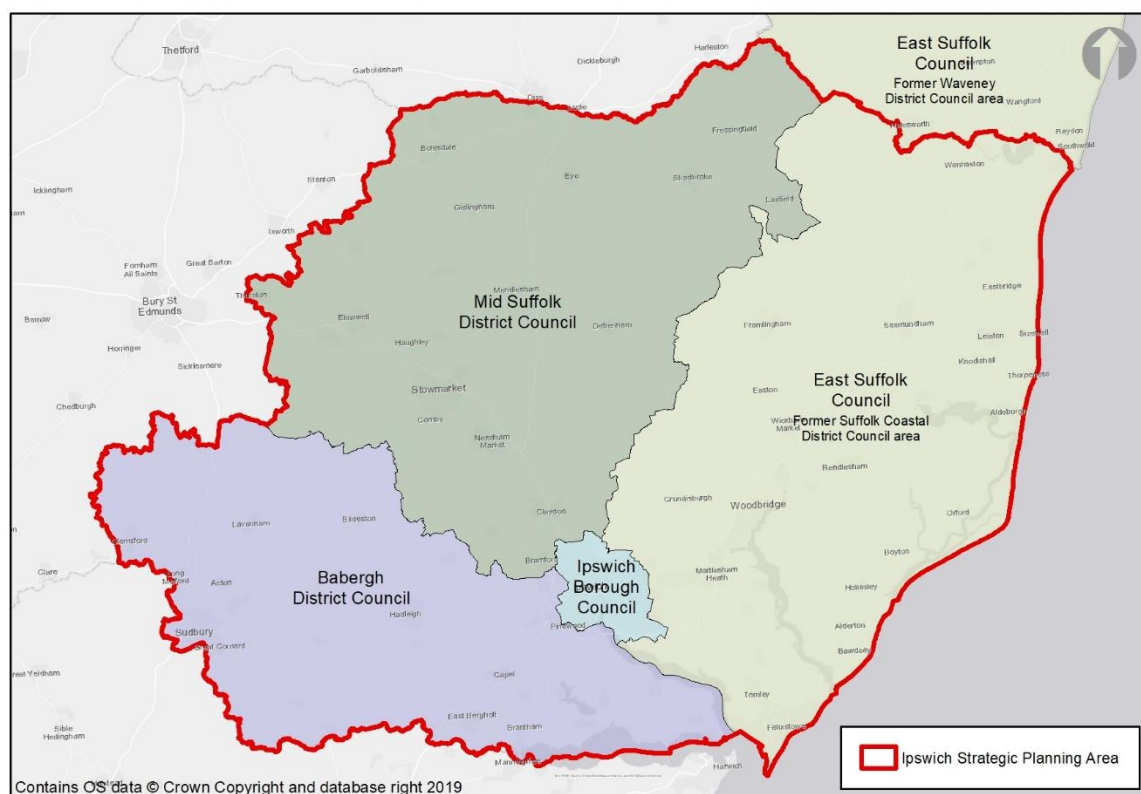
### Road network and congestion

East Suffolk Council has identified a series of key issues which the Local Plan will seek to address. One of these issues is the reliance on private motor cars and lack of public transport provision. Many areas within the Local Plan do not have access to convenient public transport and many local roads are single track and unsuitable for conventional public transport such as buses. This is reflected by the level of household vehicle ownership in the district which amounts to 86% compared to a national average of 74% (Census, 2011). Furthermore, approximately 44% of

people in the district use a car as their primary mode of travel to work compared to a national average of 37%.

As shown in **Figure B8.1** below, Easton falls within the Ipswich Strategic Planning Area. To mitigate the cumulative impacts of growth in this area on junctions and roads in and around Ipswich, and to promote healthy travel options, a package of transport measures has been identified to reduce vehicle movements, which includes:

- Transport infrastructure to encourage and support sustainable modes of transport.
- A Bus Quality Partnership.
- A Smarter Choices programme.
- Review of car parking and pricing strategies.
- Review of park and ride strategy.
- Junction improvements.



**Figure B8.1 Map of the Ipswich Strategic Planning Area<sup>46</sup>**

The draft ENP highlights that the road through the village of Easton tends to form a rat-run for vehicles travelling between the A12 at Wickham Market and the A1120 at Earl Soham. The wide and relatively straight roads can result in frequent occurrences of speeding, and as such, the implementation of a traffic calming scheme for the village of Easton is high on the list of priorities. However, there

<sup>46</sup> Ipswich Borough Council (no date): 'Ipswich Strategic Planning Area', [online] available to access via [this link](#)

remains a funding shortfall as such schemes are reliant on the availability of County Council funds.

### Public rights of way network (PRoW)

Department of Transport figures published in October 2020 show that between May and July 2020, 39% of people reported walking more and 38% reported cycling more than before the outbreak of the pandemic.

Suffolk County Council's Rights of Way Improvement Plan complements the Local Transport Plan by identifying changes that will secure an improved network, contributing to its four shared priorities of reducing congestion, accessibility, air quality and safety.

In designing and assessing development proposals, the PRoW network should be considered as a means of encouraging physical activity, providing access to the natural environment, supporting tourism, reducing travel by vehicular modes, reducing carbon emissions and (where relevant) aiding recreational avoidance of sensitive sites.

Suffolk contains one of England's most extensive networks of PRoWs. The network exceeds 5,700 kilometres, compared with approximately 6,500 kilometres of roads.

The neighbourhood area has a good network of well-maintained public footpaths, enabling walks to Kettleburgh and Parham to be made. Opportunities to supplement the network, perhaps through landowners allowing permissive routes to be established, could be established through the ENP.

### Future baseline

Given the rural nature of the neighbourhood area, and lack of public transport options, in the absence of strategic transport interventions, growth in the area will likely increase the reliance on the private vehicle for travel. Therefore, new development has the potential to increase traffic and cause congestion within the neighbourhood area, principally at junctions on key routes. This is likely to continue to be more pronounced during peak times (i.e., rush hours and holiday seasons).

There might be opportunities to improve public transport networks within the neighbourhood area to facilitate more sustainable modes of transport whilst alleviating pressures on main road networks. Similarly, the provision of infrastructure to promote at home (i.e., remote) working is likely to positively contribute towards these aims.

Whilst negative effects of new development on the transport network are likely to be mitigated in part by new infrastructure, there will be a continuing need for development to be situated in accessible locations.

### Key issues

Following the consideration of the baseline information and policy context review, the following key issues within the neighbourhood area are identified in relation to transportation:

- There are no train stations within the neighbourhood area, nor are there any buses servicing the area, which has caused a reliance on private vehicles.

Alternative sustainable modes of transport should be explored alongside the proposed development to reduce private vehicle usage where possible.

- The recovery from the COVID-19 pandemic has the potential to change travel patterns in the short, medium and (potentially) longer term. As such, residents in the neighbourhood area may have a reduced need to travel outside of the Parish due to remote working arrangements. The ENP could therefore support measures to improve self-containment and meeting more needs locally.
- Through traffic is a key concern, and improvements to public transport options within the neighbourhood area is key to addressing this. With an increase in dwellings in Easton, there will likely be more private vehicles using the road network, and therefore mitigation is necessary (though it is noted that strategic intervention is unlikely).

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