

Strategic Environmental Assessment (SEA) for the Ufford Neighbourhood Plan

Environmental Report to accompany the submission version of the
Neighbourhood Plan

Ufford Neighbourhood Plan Steering Group

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Quality information

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Non-Technical Summary

What is Strategic Environmental Assessment?

A Strategic Environmental Assessment (SEA) has been undertaken to inform the Ufford Neighbourhood Plan (hereafter referred to as 'the UNP'). This process is required by the SEA Regulations.

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to help avoid adverse environmental and socio-economic effects through the Neighbourhood Plan and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

What is the Ufford Neighbourhood Plan?

The UNP has been prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012.

Purpose of this Environmental Report

This Environmental Report, which accompanies the proposed submission version of the UNP, is the latest document to be produced as part of the SEA process.

The purpose of this Environmental Report is to:

- Identify, describe, and evaluate the likely significant effects of the UNP and alternatives.
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the UNP and its relationship with other relevant policies, plans and programmes.
- Relevant aspects of the current and future state of the environment and key sustainability issues for the area.
- The SEA Framework of objectives against which the UNP has been assessed.
- The appraisal of alternative approaches for the UNP.
- The likely significant effects of the UNP.
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the UNP.
- The next steps for the UNP and accompanying SEA process.

Consideration of reasonable alternatives for the UNP

Top-Down Considerations (e.g. Strategic Factors)

The SCLP defines Ufford as a 'Small Village' in the settlement hierarchy, which is the smallest classification, and provides the area with an indicative housing target of 44 new homes to be delivered by 2036. SCLP Table 3.5 identifies that (as of the end of March 2018) all 44 new homes had already gained planning permissions. However, in January 2024, East Suffolk District Council issued an updated indicative target for Ufford of seven additional new homes after applying the SCLP contingency multiplier of 16.5% to the 44 homes initially identified within the SCLP. Ufford's Housing Needs Assessment (HNA)¹ also concludes that up to 18 affordable homes are likely to be required to meet locally identifiable needs.

Furthermore, it is recognised that the housing position for East Suffolk (and could change in the coming months in light of the planning reforms proposed through the latest [NPPF consultation](#) (scheduled to close in September 2024). The planning reforms include a proposal to reintroduce mandatory housing targets for local authority areas, including updated housing figures based on the revised housing calculation approach set out in the consultation.

Bottom-Up Considerations (e.g. Site Availability)

In October and November 2023, Ufford Neighbourhood Plan Steering Group undertook a six-week 'Landowner Engagement' exercise, profiling available sites within the neighbourhood area for an allocation in the UNP.² At the end of the exercise, two sites had been submitted by their owners for consideration. These two sites were also submitted during the SCLP's 'Call for Sites', and their suitability considered in East Suffolk's Strategic Housing and Economic Land Availability Assessment (2018) (SHELAA).³ Both sites were noted to be potentially suitable for development but with site specific constraints which would need addressing (including in relation to access, flood risk, highways impacts, and contamination). Neither site was taken forward as an allocation within the SCLP.

Ufford Neighbourhood Plan Steering Group re-assessed the two sites in terms of their suitability for a potential Neighbourhood Plan allocation, taking into account the findings of the East Suffolk SHELAA, National Planning Practice Guidance and additional locally-specific criteria reflecting community responses on planning issues (to date).

Appraisal Part 1: Growth scenarios for the UNP

Options to be Assessed

The following two growth scenarios ('options') have been considered as reasonable alternatives through the SEA.

- **Option A:** Meet indicative housing needs during the plan period (informed by the Local Authority's position on housing requirement); and

¹ AECOM (October 2022): 'HNA for the UNP', accessible [here](#)

² Ufford Parish Web Site (2024). 'Comment on the draft Ufford Neighbourhood Plan' can be accessed [here](#).

³ East Suffolk District Council (2018). 'Strategic Housing and Economic Land Availability Assessment can be accessed [here](#).

- **Option B:** Exceed indicative housing needs during the plan period (informed by the HNA position on affordable housing requirement).

Part 1 of the appraisal considers the relative sustainability merits of the options, with findings presented as a commentary on effects. To support the appraisal findings, the two options have been ranked in terms of their sustainability performance against the relevant SEA Theme. It is anticipated that this will provide the reader with a likely indication of the relative performance of the options in relation to each theme considered.

Table 4-1 to Table 4-6 within the main body of the Environmental Report present the detailed appraisal findings of the appraisal of the two spatial strategy options for each of the SEA themes. A summary of the appraisal findings is presented in **Table NTS1** below, accompanied by conclusions.

Table NTS1: Summary of Appraisal Findings

SEA Theme		Option A	Option B
Air, Land, Soil and Water Resources	Rank	1	2
	Significant?	No	No
Biodiversity	Rank	1	2
	Significant?	No	No
Climate Change (Including Flood Risk)	Rank	1	2
	Significant?	No	No
Community Wellbeing and Transportation	Rank	2	1
	Significant?	No	Yes - Positive
Historic Environment	Rank	1	2
	Significant?	Yes - Mixed	Yes - Mixed
Landscape	Rank	1	2
	Significant?	No	No

Overall, whilst the appraisal has concluded that there is not likely to be significant environmental effects for a number of SEA themes, a range of impacts have been identified which has informed their sustainability performance. This is discussed below.

Option A emerges as the more favourable option across the following themes: Air, Land, Soil and Water Resources, Biodiversity, Climate Change (Including Flood Risk), Historic Environment and Landscape. In comparison to Option B, a lower growth option (Option A) will likely require a smaller area of land clearance, which will reduce the severity of effects on local resources, landscape, and heritage

assets and their setting. Additionally, due to the smaller influx of people into the neighbourhood area associated with Option A, impacts on local services, facilities, and travel network will also be reduced when compared to a larger growth option if the necessary capacity upgrades are not delivered alongside the development. Finally, a lower levels of growth is also associated with a lower carbon footprint, from reduced energy consumption and transport journeys during construction and operation.

Option B performs more favourably than Option A with respect to the Community Wellbeing and Transportation SEA theme. This is because the higher growth scenario will likely trigger the need to deliver homes in affordable tenures, which unlikely to be the case for Option A. With affordability of homes a key issue, both locally and nationally, Option B would likely deliver significant positive effects for the neighbourhood area.

Preferred Approach for the UNP

Given that an objective of the emerging UNP is to ensure '*that future housing development addresses the needs of the changing demographics of the village*', and there is a demonstrated need for affordable homes in the neighbourhood area, Ufford Neighbourhood Plan Steering Group have decided to proceed with **Option B** to ensure that additional homes in affordable tenures can be secured in the neighbourhood area.

Appraisal Part 2: Consideration of site options

Site availability within the neighbourhood area

East Suffolk's 2018 SHELAA identifies seven sites within Ufford as potentially suitable for development (for various uses).

Since the publication of the SHELAA, Ufford Neighbourhood Plan Steering Group have reached out to the landowners of these sites to confirm availability and support for a potential UNP allocation (including an indication of preferred uses). Community engagement on the sites has also been completed to establish potential site preferences. Five sites have since been discounted following this process

On this basis, the SEA has considered the relative sustainability merits of the remaining two sites in the neighbourhood area which may be taken forward as a UNP allocation. A straight site assessment has been undertaken, with the constraints and opportunities for each site discussed under each SEA theme. The assessments undertaken through the SEA have been undertaken separately to the initial site options and assessment process completed by the Steering Group.

Details of the two sites being assessed are shown in **Figure NTS1** below. Specifically:

- **Site A:** Former Crown Nursery Site
- **Site B:** Notcutts Nursery Site

The detailed appraisal findings are presented in **Table 4.10** and **Table 4.11** within the main body of the Environmental Report. A summary of the appraisal findings is presented in **Table NTS2** (overleaf).



Figure NTS1: Shortlisted site options considered through the SEA

Summary of Site Option Appraisal Findings

A summary of the findings is presented in **Table NTS2** below. This provides an indication of how the sites have performed in relation to each of the SEA themes, with the colouring as follows:

- Green: likely positive effects resulting from an allocation at this location.
- Yellow: likely to be limited or no effects resulting from an allocation at this location.
- Blue: likely to be uncertain effects resulting from an allocation at this location (i.e., there are constraints, but the effects are perhaps dependent or influenced on the design and mitigation measures which could be brought forward as part of a proposal); and
- Red: likely negative effects resulting from an allocation at this location.

Table NTS2: Summary of SEA Site Appraisal Findings

Site	Air Quality, Land, Soil, and Water Resources	Biodiversity	Climate Change	Community Wellbeing and Transportation	Historic Environment	Landscape
A						
B						
Key						
Likely adverse effect				Likely positive effect		
Neutral / no effect				Uncertain effect		

Whilst uncertainty remains for both sites **with regard to the Air Quality, Land, Soil, and Water Resources theme, Site A performs slightly more favourably than Site B**, mostly due to the grade of agricultural land that underlies the site. Whilst there is potential for BMV land to be permanently lost at both sites, there is a higher likelihood that Site B would result in more BMV land being lost, due to the presence of Grade 2 agricultural land within its boundaries. There is also more potential for land contamination issues at Site B, given the presence of a historic landfill site on its southern boundary. Finally, local air quality and water resources have the potential to have similar adverse effects as a result of development at the two sites; however, mitigation could be designed-in (i.e., via natural drainage solutions) to alleviate the flood risk issues.

Regarding the Biodiversity theme, both sites have the potential for adverse effects (without mitigation measures). This is primarily due to the proximity of internationally and nationally designated conservation sites to both sites, as demonstrated by their inclusion within an SSSI IRZ that includes residential developments. Additionally, both sites are identified to contain green corridors in Ufford's Environmental Report. While both sites have the potential to indirectly impact BAP Priority habitats surrounding them, Site A presents a greater risk of direct effects on these habitats

due to their presence within its site boundary (whereas there are no BAP Priority habitats within Site B). For this reason, **Site B is a more favourable option with respect to the Biodiversity theme.**

As the indicative capacity at both locations is similar (between 20-25 homes), their construction and operational carbon footprint are likely to be comparable. However, due to Site A's closer proximity to the settlement of Ufford, it is expected to generate more active transport journeys, potentially leading to a reduction in overall emissions when compared to Site B. With regard to flood risk, both sites contain areas of high and medium surface water flood risk. It should be noted that adverse effects related to surface water flooding can be avoided through the design interventions or by avoiding vulnerable areas of the site. **Overall, for the Climate Change theme, both sites perform equally, with uncertainty remaining.**

Housing availability and affordability is an issue in Ufford; both sites would deliver houses in market and affordable tenures, which would help to address an identified need in the local community and provide significant beneficial effects. Regarding transport links, both sites benefit from being located on the B1438 and adjacent to bus stops, which provide access within Ufford and to the wider area. Regarding accessibility to Ufford's amenities by foot, Site A is connected to the village by an existing footpath. For this reason, **Site A is a more favourable option than Site B for the Community Wellbeing and Transport theme.**

Both sites perform similarly with respect to the Historic Environment theme as development at neither site is anticipated to result in any adverse effects on the integrity or setting of any nationally designated heritage assets. Regarding non-designated heritage assets, applications for new development within the neighbourhood area (particularly associated with Site B) should ensure that archaeological finds (including details of their significance) are appropriately recorded in line with best practice guidance.

From a Landscape perspective, both sites have the potential for adverse effects, although Site A is likely to have a comparatively smaller adverse impact due to its proximity to the existing built-form of the village. Both sites have the potential to impact views from the Suffolk Coast & Heaths NL, which may lead to adverse impacts in the absence of mitigation (e.g., from visual screening). However, both sites are sheltered by other developments or vegetation, and are not positioned at a higher elevation than the NL, reducing the potential significance of any effects.

Overall, the appraisal findings highlight that 'uncertain effects' and 'likely adverse effects (without mitigation measures)' are likely for both sites under one or more SEA themes. **If the emerging UNP takes forward either of these sites as an allocation, it will be important for new development areas to appropriately address any concerns or constraints associated with the sites.**

Preferred Approach for the UNP

The preferred approach for the UNP is to allocate Site A (the ‘Former Crown Nursery’ site) for new development totalling between 20-25 homes (including a percentage of affordable homes). The preferred approach has been informed by the various surveys and evidence base documents prepared to support the Neighbourhood Plan (to date), responses from community consultation events, and the SEA findings.

It is recognised that Site A has been granted permission for commercial uses. The landowner is open to discussions for potential housing at this location, and East Suffolk Council have indicated that they would support a housing allocation at this location. On this basis, it is anticipated that engagement will take place between the Steering Group and the site developer with respect to the design of the proposed scheme. Design Guidelines and Codes⁴ have been established for the neighbourhood area with a view to shaping the way new development is brought forward during the plan period.

The site-specific policy for the proposed site allocation within the UNP (see Policy UFF16: Former Crown Nursery Site) contains further detail with respect to design and mitigation considerations which aim to address any potential constraints to development. These aspects are further discussed within the plan appraisal section of the Environmental Report (presented in **Chapter 5** in the main body of the report).

Appraising the proposed submission version of the UNP

The proposed submission version of the UNP presents 16 planning policies for guiding development in the neighbourhood area. These were developed following extensive community consultation and evidence gathering.

Chapter 5 within the main body of the Environmental Report presents the findings of the appraisal of the proposed submission version of the UNP. Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the Environmental Report presents the findings of the assessment as a commentary of effects under the following themes:

- Air Quality, Land, Soil and Water Resources.
- Biodiversity.
- Climate Change (Including Flood Risk)
- Community Wellbeing and Transportation
- Historic Environment
- Landscape

Overall, **no significant negative effects are considered likely in implementation of the UNP.**

Significant positive effects are expected in relation to the Community Wellbeing and Transportation theme, through the delivery of local housing in affordable tenures, the safeguarding of existing community services, facilities, and

⁴ AECOM (2023): ‘Ufford Design Guidelines and Codes’, accessible [here](#)

employment areas, and by designating Local Green Spaces. It is recognised that the Design Guidelines and Codes which have been established for the neighbourhood area will also help to shape the way new development is brought forward during the plan period.

Mixed effects are anticipated for the Landscape theme. Whilst high-quality development is encouraged through the site allocation and design policies, impacts will be dependent on the extent to which the design of the scheme appropriately respects the relationship between the built and natural environment. Nonetheless, it is recognised that impacts are most likely to be positive in light of the policy provisions within the UNP.

Minor positive effects are considered most likely in relation to Climate Change (Including Flood Risk) by encouraging sustainable transport methods, protecting the neighbourhood area's regulatory ecosystem services and the implementation of a sustainable drainage scheme on the new site allocation.

Moderate positive effects are considered most likely in relation to the Biodiversity theme, due to the safeguarding of woodland south of the allocation site and designation of green/blue corridors and LGS. In light of the conclusions from the HRA, it is anticipated that there would be no adverse effects to the integrity of European designated sites, either alone or in-combination with other plans and projects, associated with the policies and proposals within the UNP. However, as the proposed site allocation seeks to deliver 20-25 new homes and is within an SSSI IRZ for residential development, further consultation with Natural England might be required to determine whether the applications will have any significant impacts to the integrity of nationally designated sites in proximity to Ufford.

Minor negative effects are predicted in relation to the following SEA themes:

- **Historic Environment**, due to the potential presence of non-designated monuments near to the proposed site allocation; and
- **Air, Land, Soil, and Water Resources** due to the loss of Grade 3 (potentially BMV) agricultural land.

Given that several locally listed monuments on the Suffolk Heritage Explorer have been identified in the area surrounding the proposed site allocation. On this basis, **the SEA recommends** that additional text could be included in a relevant policy which reflects the potential presence of local monuments, along with precautionary measures should a monument be identified during the construction of the development. It is recognised that plan makers have incorporated the recommendation within Policy UFF10 'Historic Environment'.

Monitoring

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 UNP to identify any unforeseen effects early and take remedial action as appropriate.

It is anticipated that monitoring of effects of the UNP will be undertaken by East Suffolk Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of

the UNP that would warrant more stringent monitoring over and above that already undertaken by East Suffolk Council.

Next steps

This is the version of the SEA Environmental Report which accompanies the UNP for submission to the Local Planning Authority, East Suffolk Council, for subsequent Independent Examination. At Independent Examination, the UNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.

If the Independent Examination is favourable, the UNP will be subject to a referendum, organised by East Suffolk Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the UNP will become part of the Development Plan for the parish.

1. Introduction

1.1. Background

- 1.1.1. AECOM has been commissioned to undertake an independent Strategic Environmental Assessment in support of the emerging Ufford Neighbourhood Plan.
- 1.1.2. The Ufford Neighbourhood Plan (henceforth known as the 'UNP') is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan is being prepared in the context of East Suffolk Council's Suffolk Coastal Local Plan to 2036 (adopted in 2020) (henceforth known as the 'SCLP').
- 1.1.3. It is currently anticipated that the UNP will be submitted to of East Suffolk Council in later in 2024. Key information relating to the UNP is presented in **Table 1-1** below.

Table 1-1: Key Facts Relating to the Neighbourhood Plan

Name of Responsible Authority **Ufford Neighbourhood Plan Steering Group**

Title of Plan	Ufford Neighbourhood Plan
Subject	Neighbourhood planning
Purpose	<p>The Ufford Neighbourhood Plan is being prepared under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012, and in the context of the Suffolk Coastal Local Plan (2020).</p> <p>The Ufford Neighbourhood Plan will be used to guide and shape development within the neighbourhood area.</p>
Timescale	2024 to 2036
Area covered by the plan	The neighbourhood area covers the civil parish of Ufford, located in Suffolk (East Suffolk District).
Summary of content	The Ufford Neighbourhood Plan will set out a vision, strategy, and range of policies for the neighbourhood area.
Plan contact point	<p>J.H., Clerk to Ufford Parish Council</p> <p>Email: ufford.pc@hotmail.com</p>

1.2. SEA Screening for the Ufford Neighbourhood Plan

- 1.2.1. A Neighbourhood Plan requires Strategic Environmental Assessment (SEA) where it is likely to have significant environmental effects. In this respect, Neighbourhood Plans are more likely to be screened in as requiring an SEA if both the following apply:
- the Neighbourhood Plan is being prepared in an area with significant environmental constraints, such as, for example, Special Areas of Conservation, Sites of Special Scientific Interest, or large concentrations of heritage assets; and
 - the Neighbourhood Plan is likely to allocate sites for development.⁵
- 1.2.2. The draft UNP was screened by East Suffolk Council in April 2024. The screening process is based upon consideration of standard criteria to determine whether the UNP is likely to have “significant environmental effects”, and subsequently whether there is a need for SEA. The screening concluded that an SEA (and Habitats Regulation Assessment [HRA]) is required because the neighbourhood area is in proximity to several European designated sites and is intending to designate a site for a housing development⁶.
- 1.2.3. In light of this outcome, an SEA process is being undertaken to meet the specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).⁷

1.3. SEA Explained

- 1.3.1. SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues. The aim of SEA is to inform the plan-making process with a view to avoiding and mitigating potential negative impacts and maximising the potential for positive effects. Through this approach, the SEA for the UNP seeks to maximise the emerging plan’s contribution to sustainable development.
- 1.3.2. Two key procedural requirements of the SEA Regulations are that:
- When deciding on ‘the scope and level of detail of the information’ which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues.
 - A report (the ‘Environmental Report’) is published for consultation alongside the plan that presents outcomes from the environmental

⁵ DLUHC (February 2022): Chief Planner’s Newsletter, February 2022 ‘Strategic Environmental Assessment for Neighbourhood Plans: Timely and effective screening’ accessible [here](#).

⁶ East Suffolk Council (April 2024): ‘SEA Screening Opinion for the draft UNP’ *The SEA and HRA Screening Opinions contribute to the evidence base for the UNP*.

⁷ UK Government (2004) ‘The Environmental Assessment of Plans and Programmes Regulations 2004’ can be accessed [here](#).

assessment (i.e., discusses ‘likely significant effects’ that would result from plan implementation) and reasonable alternatives.

1.3.3. This ‘Environmental Report’ is concerned with item ‘ii’ above.

1.4. Structure of this Environmental Report

1.4.1. This document is the SEA Environmental Report for the UNP and hence needs to answer all four of the questions listed below with a view to providing the information required by the SEA Regulations.

Table 1-2: Questions that Must be Answered by the SEA Environmental Report to Meet the Regulatory⁸ Requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ⁹
What is the plan seeking to achieve?	An outline of the contents and main objectives of the plan.
What is the sustainability ‘context’?	Relationship with other relevant plans and programmes. The relevant environmental protection objectives , established at international or national level. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What is the scope of the SEA?	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.
What is the sustainability ‘baseline’?	The environmental characteristics of areas likely to be significantly affected. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What are the key issues and objectives?	Key problems/issues and objectives that should be a focus of (i.e., provide a ‘framework’ for) assessment.
What has plan-making/SEA involved up to this point?	Outline reasons for selecting the alternatives dealt with. The likely significant effects associated with alternatives . 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.

⁸ Environmental Assessment of Plans and Programmes Regulations 2004

⁹ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

Environmental Report
question

In line with the SEA Regulations, the report must include...⁹

What are the assessment
findings at this stage?

The likely significant effects associated with **the submission version of the plan**.

The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing **the submission version of the plan**.

What happens next?

The next steps for the plan making / SEA process.

2. Local Plan Context and Vision for the Neighbourhood Plan

2.1. Local Plan Context for the UNP

- 2.1.1. Located within East Suffolk, the UNP is being prepared in the context of the SCLP (2020-2036)¹⁰ which was adopted in September 2020. The SCLP covers the former Suffolk Coastal part of East Suffolk and sets out the long-term planning and land use policies within East Suffolk (excluding the former district of Waveney, which has its own separate Local Plan).
- 2.1.2. Ufford is identified as a 'small village' within Policy SCLP3 'Settlement Hierarchy'. The policy confirms that development requirements will be delivered through site allocations within the Local Plan or in Neighbourhood Plans, plus through windfall development in accordance with other policies in the SCLP. Table 3.5 within the SCLP outlines the housing position with respect to each settlement within the Suffolk Coast. Whilst no housing allocations are included for Ufford, Table 3.5 provides an indicative contribution of 44 homes during the plan period (which have come forward via existing completions and commitments). However, in January 2024, East Suffolk District Council issued an updated indicative target for Ufford of seven additional new homes after applying the SCLP contingency multiplier of 16.5% to the 44 homes initially identified within the SCLP.
- 2.1.3. Policy SCLP5.2 'Housing Development in Small Villages' states that residential development will be permitted within defined settlement boundaries where it is a small group of dwellings of a scale appropriate to the size, location and character of the village, or as infill development (in accordance with Policy SCLP5.7. Additionally, the policy goes on to state that residential development will also be permitted on exception sites adjacent or will related to defined settlement boundaries in accordance with Policy SCLP5.11.
- 2.1.4. Neighbourhood plans will form part of the development plan for East Suffolk, alongside, but not as a replacement for the SCLP. 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.

¹⁰ East Suffolk Council (2020): 'Local Plans: Suffolk Coastal Local Plan', [online] accessible [here](#)

2.2. Vision and Objectives for the UNP

2.2.1. The vision for the UNP captures the community's views and aspirations for the neighbourhood area as expressed through the neighbourhood planning process. It forms the basis on which the neighbourhood objectives and proposed policies have been formulated.

2.2.2. The vision is as follows:

'Ufford parish will maintain its distinctive and separate identity, protecting the spaces between us and the neighbouring villages to prevent coalescence. There will be a range of housing types and tenures to suit all ages, supported by good rural village amenities. Development will be environmentally, economically and socially sustainable. It will be well designed and fit within the character of the parish. Green spaces, the natural environment and local heritage will be protected. Ufford will continue to be an attractive village that meets the needs of its community'

2.2.3. The UNP also includes five objectives which will help to deliver the vision:

- 'Housing objective: To ensure that future housing development addresses the needs of the changing demographics of the village by providing a variety of housing of appropriate size and scale. New housing should ensure that the distinctive character of the village is maintained, should be well designed and environmentally and socially sustainable.
- Environment objective: To protect the rural landscape setting, green spaces and historic environment of the parish, whilst promoting, managing and enhancing its existing wildlife/biodiversity assets and encouraging an active environmental role for the community.
- Accessibility objective: To ensure that new development improves and enhances accessibility for both residents and visitors to the village through protecting public rights of way and encouraging the creation of safe routes for pedestrians and cyclists, which connect to village services.
- Community objective: To protect and enhance the parish's existing community facilities and supporting the development of appropriate new facilities; and
- Business objective: To support appropriate new and existing small-scale businesses and enable them to thrive in Ufford'

3. What is the Scope of the SEA?

3.1. Summary of SEA Scoping

- 3.1.1. The SEA Regulations require that: *‘When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies’*.¹¹
- 3.1.2. In England, the consultation bodies are Natural England, the Environment Agency, and Historic England.¹² These authorities were consulted on the scope of the SEA for a period of five weeks between April and May 2024.
- 3.1.3. The purpose of scoping was to outline the ‘scope’ of the SEA through setting out the following information:
- A context review of the key environmental and sustainability objectives of national, regional, and local plans and strategies relevant to the UNP.
 - Baseline data against which the UNP can be assessed.
 - The key sustainability issues for the UNP; and
 - An ‘SEA Framework’ of objectives against which the UNP can be assessed.
- 3.1.4. The full SEA Scoping Report is available on the UNP website¹³. The key sustainability issues for each SEA theme, and the SEA Framework, are presented below.
- 3.1.5. Responses received on the Scoping Report, and how they have been considered and addressed through the SEA, are summarised in **Table 3.1**.

¹¹ ‘Government (2004). ‘The Environmental Assessment of Plans and Programmes Regulations 2004’ can be accessed [here](#).

¹² In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme’.

¹³ Including the context review and baseline data for the neighbourhood area, for each SEA theme.

Table 3-1: Consultation responses received on the SEA Scoping Report

Consultation Response	How the Response was Considered and Addressed
<p>Historic England</p> <p>Adviser (response received on 2nd May 2024)</p> <p><i>‘...We are pleased to see reference to the advice and methodology contained with Historic England’s various recommended good practice and advice notes which set 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.</i></p> <p><i>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 minimised or mitigated.</i></p> <p><i>We are pleased to see that Ufford’s local non-designated heritage assets will be included in the assessment, and the Historic Environment Record has been and will be further consulted at a higher level. In line with Historic England’s advice, we recommend that the HER is consulted rather than the Gateway as this is more likely to be up to date. We are also pleased to see a specific question has been included to consider the Conservation Area.</i></p> <p><i>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) 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</i></p>	<p>Comment noted.</p> <p>The recommendations have been considered by plan makers during the preparation of UNP policies.</p> <p>Impacts to the historic environment associated with the policies and proposals within the UNP are discussed within the assessment of reasonable alternatives (Chapter 4) and appraisal of UNP policies (Chapter 5) in this Environmental Report.</p> <p>Where appropriate, the SEA has made recommendations with a view to encouraging positive outcomes within the neighbourhood area associated with new development areas, including with respect to potential mitigation and enhancement measures.</p>

Consultation Response

How the Response was Considered and Addressed

opportunities for securing wider benefits for the future conservation and management of heritage assets...

Environment Agency

Sustainable Places Planning Adviser (response received on 7th May 2024)

'...Thank you for consulting us on the Strategic Environmental Assessment (SEA) Scoping Report for the Ufford Neighbourhood Plan.

...

Environmental Constraints

We have identified that the Neighbourhood Plan Area will be affected by the following environmental constraints:

Flood Risk

Based on a review of environmental constraints for which we are a statutory consultee, we find that there are areas of fluvial flood risk and watercourses within the neighbourhood plan area. In particular, we note that the boundary does extend into areas of Flood Zones 2 and 3 of the River Deben and Byng Brook.

On the basis that future development is steered away from the sensitive aspects of the environment highlighted, we do not consider there to be potential significant environmental effects relating to these environmental constraints. Nevertheless, we recommend the inclusion of relevant policies to cover the management of flood risk. Allocation of any sites and any windfall development delivered through the Plan period should follow the sequential approach. National Planning Policy Framework (NPPF) paragraph 167 sets this out.

Comments noted.

The recommendations have been considered by plan makers during the preparation of UNP policies.

Potential impacts to land, soil and water resources associated with the policies and proposals within the UNP are discussed within the assessment of reasonable alternatives (Chapter 4) and appraisal of UNP policies (Chapter 5) in this Environmental Report.

Where appropriate, the SEA has made recommendations with a view to encouraging positive outcomes within the neighbourhood area associated with new development areas, including with respect to potential mitigation and enhancement measures.

Consultation Response

How the Response was Considered and Addressed

Water Resources

Being in one of the driest areas of the country, our environment has come under significant pressure from potable water demand. New developments should make a significant contribution towards reducing water demand and mitigate against the risk of deterioration to our rivers, groundwater and habitats from groundwater abstraction.

We recommend you check the capacity of available water supplies with the water company, in line with the emerging 2024 Water Resources Management Plan which is due to be published in 2023. The Local Planning Authorities Water Cycle Study and Local Plan may indicate constraints in water supply and provide recommendations for phasing of development to tie in with new alternative strategic supplies.

New development should as a minimum meet the highest levels of water efficiency standards, as per the policies in the adopted Local Plan. In most cases development will be expected to achieve 110 litres per person per day as set out in the Building Regulations &c. (Amendment) Regulations 2015. However, a higher standard of water efficiency (e.g. 85 l/p/d) should be considered, looking at all options including rainwater harvesting and greywater systems. Using the water efficiency calculator in Part G of the Building Regulations enables you to calculate the devices and fittings required to ensure a home is built to the right specifications to meet the 110 l/p/d requirement. We recommend all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

Developments that require their own abstraction where it will exceed 20 cubic metres per day from a surface water source (river, stream) or from underground strata (via borehole or well) will require an abstraction licence under the terms of the Water Resources Act 1991. There is no guarantee that a licence will be granted as this is

Consultation Response

How the Response was Considered and Addressed

dependent on available water resources and existing protected rights. The relevant abstraction licencing strategy for your area provides information on water availability and licencing policy at Abstraction licensing strategies (CAMS process) - GOV.UK.

...

Source Protection Zones

Your plan includes areas which are located on Source Protection Zones 3. These should be considered within your plan if growth or development is proposed here. The relevance of the designation and the potential implication upon development proposals should be considered with reference to our Groundwater Protection guidance: <https://www.gov.uk/government/collections/groundwater-protection...>

Natural England

Adviser (response received on 2nd May 2024)

'...Natural England has no specific comments to make on the scope of this neighbourhood plan's SEA. However, we refer you to the advice in the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan...'

Comment noted.

The annex has been a useful source of evidence during the subsequent stages of the SEA process.

3.2. Key Sustainability Issues

Air Quality, Land, Soil and Water Resources

- There are no Air Quality Management Areas (AQMA) within the neighbourhood area.
- Emissions associated with road transport (primarily NO₂) are the main pollutant of concern in Ufford.
- The neighbourhood area contains three distinct longitudinal bands of Grade 4 Poor, 3 Good to Moderate, and 2 Very Good agricultural land, with grades improving as one moves from east to west.
- In the absence of a detailed Agricultural Land Classification (ALC) assessment it is currently not possible to determine whether the Grade 3 areas can be classified as Grade 3a (i.e., best and most versatile land) or Grade 3b land.
- There are no Minerals and Waste Sites or Waste Water Treatment Plant Safeguard Areas identified in Ufford as defined by the Suffolk Minerals and Waste Plan.
- The water resources located within and within proximity to the neighbourhood area include the River Deben (a main river) and Byng Brook (an ordinary watercourse), alongside a network of drainage ditches.
- The neighbourhood area falls within the East Suffolk and Essex Water Resource Zone, which experiences pressures due to climate change and population growth.
- The entirety of the neighbourhood area is within Surface Water S419-Deben NVZ and Groundwater G78-Sandlings and Chelmsford zone.

Biodiversity

- Whilst there are no internationally designated sites for biodiversity conservation located within the neighbourhood area, there are four of these sites within 10 km (the closest being 1.1 km south).
- There are also no nationally designated sites for biodiversity conservation located within the neighbourhood area; however, there are three sites within 5 km (the closest being 3.3 km south).
- All of the neighbourhood area overlaps with a Site of Special Scientific Interest (SSSI) Impact Risk Zone (IRZ) for all development types (except household applications).
- There are three County Wildlife Sites (CWS) in the neighbourhood area.
- There are a variety of Biodiversity Action Plan (BAP) Priority Habitats located within or within proximity to the neighbourhood area, including areas of

deciduous woodland, coastal and floodplain grazing marsh, good quality semi-improved grassland, and wood-pasture and parkland.

- Some of the areas of deciduous woodland BAP Priority Habitat are identified as areas of ancient woodland, including Ufford Thicks and an unnamed wood.
- The neighbourhood area has an extensive network of blue and green wildlife corridors.

Climate Change (Including Flood Risk)

- Any increases in the built footprint of the neighbourhood area (associated with the delivery of new housing and employment land) has the potential to increase the area's overall greenhouse gas emissions.
- The largest sectors for CO₂ emissions in 2021 were Transport and Commercial.
- East Suffolk Council declared a climate emergency in 2019 and has resolved to support neighbourhood groups to help tackle climate change through plan-making.
- The areas at highest risk of fluvial flooding (Flood Zone 3) are those surrounding the River Deben and its tributaries in the south-eastern and central regions of the neighbourhood area.
- Areas of High and Medium risk of surface water flooding also broadly follow the River Deben and its tributaries, although there are additional areas of higher risk found extending to the west.
- The UNP should seek to increase the resilience of the neighbourhood area to the effects of climate change by supporting and encouraging adaptation strategies.

Community Wellbeing and Transportation

- In 2021 the population of Ufford was 1,016 – an increase of 7% from 948 in 2011.
- The neighbourhood area contains one Lower Super Output Area (LSOA) within the 50% most deprived LSOAs in England for the following Index of Multiple Deprivation domains: Barriers to Housing and Services; and Living Environment Deprivation.
- In 2021, the majority of households within the neighbourhood area owned their property outright or with a mortgage/loan (at 80%), with an additional 1% in shared ownership. Private rent and social rent accounted for 8% and 11% of the area's tenure mix, respectively.
- The neighbourhood area has a limited range of local community facilities, meaning residents rely on neighbouring areas (such as Melton and Wickham Market) to access services and facilities.

- As the neighbourhood area is predominantly rural, there is a good supply of local woodland and rivers, many of which can be accessed by the extensive public footpath network.
- The neighbourhood area's road network consists mostly of unclassified roads passing through Ufford village; however, there is one A Road (A12) and one B road (B1438).
- As there is no train station in Ufford, public transport is only available in the form of buses, of which there are three services that pass through the neighbourhood area.
- Ufford is home to a public right of way (PRoW) network comprised of footpaths, bridleways, and restricted byways.

Historic Environment

- The neighbourhood area contains 28 listed buildings (27 Grade II and one Grade I) which are protected through the Listed Buildings and Conservation Areas Act 1990.
- The neighbourhood area is home to a conservation area: 'Ufford with part of Melton', designated for the number and quality of its traditional buildings.
- There are 13 features within Ufford based on a high-level review of the Suffolk Historic Environment Record (HER) and Historic England research records.

Landscape

- Suffolk Coast & Heaths National Landscape (NL) is located 950 m east of Ufford.
- Ufford sits within two National Character Area (NCA): the Suffolk Coast & Heaths NCA, covering the eastern half of the neighbourhood area; and South Norfolk and High Suffolk Clayland's, covering the western half of the neighbourhood area.
- Suffolk's Landscape Character Assessment mapping identifies that Ufford falls within four Suffolk Character Areas: Ancient Rolling Farmlands; Plateau Estate Farmlands; Rolling Estate Sandlands; and Valley Meadowlands.
- East Suffolk's mapping system indicates that there are several Tree Preservation Orders (TPOs) within Ufford. These are all found near the neighbourhood area's southern boundary, close to The Avenue.
- There is low land in the central and south-eastern regions, with higher land found in the west and north-east.

3.3. SEA Framework

- 3.3.1. The SEA Framework provides a way in which environmental effects can be defined and subsequently analysed based on standard 'tests'. Each

proposal within the current version (i.e., the submission version) of the UNP has been assessed consistently using the Framework.

Table 3-2: SEA Framework for the UNP

SEA Objective	Assessment questions (will the option/proposal help to...)
Air Quality, Land, Soil and Water Resources	
Ensure the efficient and effective use of land and protect and enhance air and water quality.	<ul style="list-style-type: none"> • Avoid the loss of high-quality agricultural land resources? • Promote any opportunities for the use of previously developed land, or vacant / underutilised land? • Avoid impacts on water quality? • Support improvements to water quality? • Ensure appropriate drainage and mitigation is delivered alongside development? • Protect the neighbourhood area's waterbodies? • Maximise water efficiency and opportunities for water harvesting and/ or water recycling? • Protect the integrity of mineral resources? • Avoid adverse impacts on air quality?
Biodiversity	
Maintain and enhance the extent and quality of biodiversity habitats and networks within and surrounding the neighbourhood area.	<ul style="list-style-type: none"> • Protect and enhance internationally, nationally, and locally designated sites, including supporting habitats and mobile species that are important to the integrity of these sites? • Protect and enhance priority habitats and the links between them? • Achieve a net gain in biodiversity? • Support habitat restoration or new habitat creation? • Support enhancements to multifunctional green infrastructure networks and the network of open spaces?
Climate Change (Including Flood Risk)	
Reduce the contribution to climate change made by activities in the neighbourhood area.	<ul style="list-style-type: none"> • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Improve or extend local footpaths, cycle paths or strategic green infrastructure routes? • Encourage opportunities for new development to meet or exceed sustainable design criteria? • Generate energy from low or zero carbon sources? • Reduce energy consumption from non-renewable resources? • Support the transition to electric vehicles?

SEA Objective	Assessment questions (will the option/proposal help to...)
Support the resilience of the neighbourhood area to the potential effects of climate change, including flood risk.	<ul style="list-style-type: none"> • Avoid inappropriate development in areas at risk of flooding, considering the likely future effects of climate change? • Improve and extend green infrastructure networks in the neighbourhood area? • Sustainably manage water runoff? • Increase the resilience of the local built and natural environment? • Ensure the potential risks associated with climate change are duly considered in the design of new development in the neighbourhood area?

Community Wellbeing and Transportation

Ensure growth in the neighbourhood area is aligned with the needs of all residents and in suitably connected places, supported by the appropriate and timely provision of infrastructure to enable cohesive and inclusive communities.	<ul style="list-style-type: none"> • Provide everyone with the opportunity to live in good quality and affordable housing? • Support the provision of a range of house types and sizes targeted at aligning the housing stock with local needs? • Provide flexible and adaptable homes that meet people's changing needs? • Improve the availability and/ or accessibility of local services and facilities? • Encourage and promote social cohesion and active involvement of local people in community activities? • Contribute to improving aspects of deprivation in the neighbourhood area? • Maintain or enhance the quality of life of existing and future residents?
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Historic Environment

Protect, conserve and enhance the historic environment within and surrounding the neighbourhood area.	<ul style="list-style-type: none"> • Conserve and enhance buildings and structures of architectural or historic interest, both designated and non-designated, and their settings? • Conserve and enhance the special interest, character and appearance of locally important features and their settings? • Protect the integrity of the historic setting of key monuments of cultural heritage interest as listed in the Suffolk HER? • Protect the integrity of the Conservation Area and its setting? • Support the undertaking of early archaeological investigations and, where appropriate, recommend mitigation strategies?
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SEA Objective	Assessment questions (will the option/proposal help to...)
	<ul style="list-style-type: none"> • Support access to, interpretation and understanding of the historic evolution and character of the neighbourhood area?
Landscape	
Protect and enhance the character and quality of the immediate and surrounding landscape and villagescape, including green infrastructure corridors.	<ul style="list-style-type: none"> • Protect and/ or enhance the integrity and setting of the Suffolk Coast & Heaths National Landscape? • Protect and/or enhance the integrity of the Suffolk Coast & Heaths National Landscape NCA, Ancient Rolling Farmlands SCA, Plateau Estate Farmlands SCA, Rolling Estate Sandlands SCA and Valley Meadowlands SCA? • Protect and/ or enhance local landscape character and quality of place? • Conserve and enhance local identity, diversity, and settlement character? • Identify and protect locally important viewpoints which contribute to character and sense of place? • Protect and extend/ enhance green infrastructure corridors? • Protect visual amenity? • Retain and enhance landscape features that contribute to the rural setting, including trees and hedgerows?

4. Consideration of Reasonable Alternatives through the SEA

4.1. Introduction

- 4.1.1. In accordance with the SEA Regulations the Environmental Report must include:
- An outline of the reasons for selecting the alternatives dealt with; and
 - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.1.2. The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, how the SEA process has informed the consideration of different approaches for key elements of the UNP.

4.2. Establishing Reasonable Alternatives

- 4.2.1. Whilst work on the UNP 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.
- 4.2.2. In the context of the above, this chapter of the Environmental Report presents information on reasonable alternative approaches to addressing key issues that are of central importance to the UNP.

Top-Down Considerations (e.g. Strategic Factors)

- 4.2.3. The SCLP defines Ufford as a 'Small Village' in the settlement hierarchy, which is the smallest classification, and provides the area with an indicative housing target of 44 new homes to be delivered by 2036. SCLP Table 3.5 identifies that (as of the end of March 2018) all 44 new homes had already gained planning permissions. However, in January 2024, East Suffolk District Council issued an updated indicative target for Ufford of seven additional new homes after applying the SCLP contingency multiplier of 16.5% to the 44 homes initially identified within the SCLP. Ufford's Housing Needs Assessment (HNA)¹⁴ also concludes that up to 18 affordable homes are likely to be required to meet locally identifiable needs.
- 4.2.4. Furthermore, it is recognised that the housing position for East Suffolk (and could change in the coming months in light of the planning reforms proposed through the latest [NPPF consultation](#) (scheduled to close in September 2024). The planning reforms include a proposal to reintroduce mandatory housing targets for local authority areas, including updated housing figures based on the revised housing calculation approach set out in the consultation.

¹⁴ AECOM (October 2022): 'HNA for the UNP', accessible [here](#)

Bottom-Up Considerations (e.g. Site Availability)

- 4.2.5. In October and November 2023, Ufford Neighbourhood Plan Steering Group undertook a six-week 'Landowner Engagement' exercise, profiling available sites within the neighbourhood area for an allocation in the UNP.¹⁵ At the end of the exercise, two sites had been submitted by their owners for consideration. These two sites were also submitted during the SCLP's 'Call for Sites', and their suitability considered in East Suffolk's Strategic Housing and Economic Land Availability Assessment (2018) (SHELAA).¹⁶ Both sites were noted to be potentially suitable for development but with site specific constraints which would need addressing (including in relation to access, flood risk, highways impacts, and contamination). Neither site was taken forward as an allocation within the SCLP.
- 4.2.6. Ufford Neighbourhood Plan Steering Group re-assessed the two sites in terms of their suitability for a potential Neighbourhood Plan allocation, taking into account the findings of the East Suffolk SHELAA, National Planning Practice Guidance and additional locally-specific criteria reflecting community responses on planning issues (to date).

4.3. Defining Reasonable Alternatives

- 4.3.1. In the context of the above, the consideration of reasonable alternatives for the SEA has been presented in two parts, as follows:
- **Part 1: Growth scenarios for the UNP**
 - **Part 2: Consideration of site options within the neighbourhood area**

Appraisal Part 1: Growth scenarios for the UNP

Options to be Assessed

- 4.3.2. The following two growth scenarios ('options') have been considered as reasonable alternatives through the SEA.
- **Option A:** Meet indicative housing needs during the plan period (informed by the Local Authority's position on housing requirement); and
 - **Option B:** Exceed indicative housing needs during the plan period (informed by the HNA position on affordable housing requirement).
- 4.3.3. Part 1 of the appraisal considers the relative sustainability merits of the options, with findings presented as a commentary on effects. To support the appraisal findings, the two options have been ranked in terms of their sustainability performance against the relevant SEA Theme. It is anticipated that this will provide the reader with a likely indication of the relative performance of the options in relation to each theme considered.

¹⁵ Ufford Parish Web Site (2024). 'Comment on the draft Ufford Neighbourhood Plan' can be accessed [here](#).

¹⁶ East Suffolk District Council (2018). 'Strategic Housing and Economic Land Availability Assessment can be accessed [here](#).

Appraisal Findings

4.3.4. **Table 4-1 to Table 4-6** below present the findings of the appraisal of the two spatial strategy options for each of the SEA themes.

Table 4-1: Appraisal Findings (Air Quality, Land, Soil, and Water Resources)

Discussion of Potential Effects and Relative Merits of Options	Rank of Preference	
	Option A	Option B
<p>It is recognised that transport emissions are a key contributor to air quality concerns within East Suffolk. Given that the neighbourhood area's residents mostly rely on neighbouring areas for many services and facilities, an increase in journeys made by private vehicles to and from the neighbourhood area has the potential to worsen local air quality. In this respect, the higher growth strategy (Option B) would perform less favourably given the increased likelihood of it bringing more private vehicles to the neighbourhood area.</p> <p>According to the ALC, a large area of Ufford is underlain by Best and Most Versatile (BMV) land. The neighbourhood area also has areas of previously developed (brownfield) land, which would be preferable locations for future developments from a land and soil perspective. Overall, a smaller growth scenario (Option A) is likely to perform more favourably in this regard. However, the significance of this effect would be more dependent on the specific location of the development; therefore, some uncertainty remains.</p> <p>Developments can have adverse impacts local water resources, for example, by straining local water supplies, disrupting natural drainage, and increasing water pollution through runoff. Whilst these impacts can be mitigated through design choices (such as the use of permeable surfaces), a higher growth scenario is likely to place additional pressure on the capacity of existing infrastructure and strain on water resources. Therefore, Option A also performs slightly better than Option B in this regard.</p>	1	2

Table 4-2: Appraisal Findings (Biodiversity)

Discussion of Potential Effects and Relative Merits of Options	Rank of Preference	
	Option A	Option B
<p>Developments can lead to adverse effects on biodiversity. For example, clearing land for construction can lead to the loss of habitats and directly injure local fauna, while increased human activity can also cause disturbances during both the construction and operation phases of the development. The likelihood for potential adverse effects from developments on biodiversity is particularly heightened in ecologically sensitive areas. An example of such an area is land that falls within a designated SSSI IRZ, which is the case for almost the entirety of the neighbourhood area. In this respect, Option A would perform more favourably than Option B due to the lower rate of growth resulting in fewer potential impacts, although it is noted that impacts are significantly influenced by the location of where new development comes forward. It is also noted both options would likely require consultation with Natural England due to the SSSI IRZ overlapping the neighbourhood area.</p> <p>However, it is also worth noting that mitigation for such issues (and enhancements to the biodiversity baseline) can be included in development design by preserving green spaces within development sites and by incorporating green infrastructure enhancements, which can deliver net-gains for nature, tackle local air quality concerns by widening tree and vegetation cover, and increase the number of alternative spaces for recreational uses. In this respect, the higher growth option (Option B) may lead to larger</p>	1	2

Discussion of Potential Effects and Relative Merits of Options

Rank of Preference

development sites coming forward and increase the viability of delivering green infrastructure enhancements and net gains for nature.

Table 4-3: Appraisal Findings (Climate Change [Including Flood Risk])

Discussion of Potential Effects and Relative Merits of Options

Rank of Preference

Developments can contribute to climate change through increased carbon emissions from construction activities, energy use (during operation and construction), and transportation.

Option A	Option B
1	2

During the construction phase, Option A would perform more favourably than Option B as a lower growth option may result in fewer materials being used and help to limit emissions being released from construction activities.

During the operational phase of the development, the extent to which the options support climate change mitigation efforts is dependent (in part) on a strategy which promotes new development at locations in closer proximity to local services and facilities, public transport networks, and walking and cycling networks. In this respect, Option A would also perform more favourably than Option B. This is because the neighbourhood area has a limited number of services and facilities, which means residents will need to travel to neighbouring areas to access these; a larger number of properties is likely to lead to a larger number of journeys by private transport to services and facilities in the wider area. A smaller growth scenario would therefore limit potential increases in local CO₂ emissions.

Regarding surface water flood risks, it is anticipated that any surface water run-off issues could largely be addressed through appropriate drainage management through the design of new development proposals. Therefore, both options perform similarly in this respect, with Option A slightly more favourable than Option B due to fewer interventions needed.

Table 4-4: Appraisal Findings (Community Wellbeing and Transportation)

Discussion of Potential Effects and Relative Merits of Options

Rank of Preference

With regards to housing numbers, a local HNA for the neighbourhood area identifies an affordable housing need of 18 homes. In this respect, Option B would perform more favourably as it is more likely to trigger SCLP Policy 5.10's requirement for developments of ten or more units to make provision for one in three units to be offered in affordable tenures. This is particularly likely if development is brought forward on larger sites, which can accommodate higher levels of growth and increase the viability of bringing forward a diverse housing mix (in terms of type, tenure, and affordability).

Option A	Option B
2	1*

A larger growth scenario (i.e. Option B) would mean that more households will live in the neighbourhood area. This has both positives and negative effects. On one hand, more households would result in a greater boost to the local economy within the village, with more people spending money in the neighbourhood area (although it is noted that services and facilities within Ufford are relatively limited). On the other hand, a larger influx of households to the area may also increase pressure on local services and amenities if appropriate community infrastructure is not delivered alongside new housing.

Discussion of Potential Effects and Relative Merits of Options

Rank of Preference

With regard to local transport, a higher growth option may have a greater adverse impact on the local road network in comparison to a lower growth option. With more residents, there is likely to be a greater increase in localised traffic, which can lead to more local congestion (which can impact locals' commute times and health).

Table 4-5: Appraisal Findings (Historic Environment)

Discussion of Potential Effects and Relative Merits of Options

Rank of Preference

Ufford is home to many heritage assets of varying importance. Developments can have both direct and indirect impacts on historic assets. Direct impacts may include physical damage or alteration to the asset itself due to construction activities, whilst indirect impacts may arise from changes in the local environment caused by the development. For example, increased traffic, noise pollution, or changes in land use patterns could impact the historic asset's setting.

Whilst direct effects can be avoided by choosing development sites away from the area's historic assets, indirect effects can still occur if the development affects an asset's setting. With respect to indirect impacts, the lower growth option (i.e. Option A) is likely to be more favourable, given the smaller development footprint and the lower number of additional people and vehicles it would introduce to the area.

Ufford village has the greatest concentration of heritage assets in the neighbourhood area, and future growth is likely to be located within proximity of the village (given the relative sustainability performance of available site options). On this basis, higher growth through Option B may have a greater impact on the historic environment in comparison to the lower growth option (Option A). However, the extent of the impacts (i.e., positive or negative) depend on how the significance and special qualities of the historic environment are reflected within the design of new development areas which come forward.

Option A	Option B
1*	2*

Table 4-6: Appraisal Findings (Landscape)

Discussion of Potential Effects and Relative Merits of Options

Rank of Preference

Suffolk Coast & Heaths National Landscape (NL) is located 950m east of Ufford, meaning that housing developments have the potential for adverse impacts on views towards, and out of, the NL (in addition to local landscape and villagescape character). This is because developments can alter landscapes through land clearance and the erection of buildings, leading to habitat loss and aesthetic changes. Considerations at the design stage, such as preserving green spaces and incorporating landscaping practices, can mitigate these adverse effects and maintain visual harmony with the surrounding environment. The significance of the impact will also be dependent on the location of the development (related to the site's elevation from the ground, and whether there is any existing screening surrounding the site). Whilst uncertainty remains for both options, the larger growth strategy (i.e. Option B) is associated with a larger development footprint and a larger quantity of houses to be built, which has a greater potential for negative adverse effects on the surrounding landscape.

Option A	Option B
1	2

Summary of Appraisal Findings

- 4.3.5. **Table 4-7** below summarises the rankings of the options in terms of their relative performance for each SEA theme. This is followed by the key conclusions of the appraisal findings.

Table 4-7: Summary of Appraisal Findings

SEA Theme		Option A	Option B
Air, Land, Soil and Water Resources	Rank	1	2
	Significant?	No	No
Biodiversity	Rank	1	2
	Significant?	No	No
Climate Change (Including Flood Risk)	Rank	1	2
	Significant?	No	No
Community Wellbeing and Transportation	Rank	2	1
	Significant?	No	Yes - Positive
Historic Environment	Rank	1	2
	Significant?	Yes - Mixed	Yes - Mixed
Landscape	Rank	1	2
	Significant?	No	No

- 4.3.6. Overall, whilst the appraisal has concluded that there is not likely to be significant environmental effects for a number of SEA themes, a range of impacts have been identified which has informed their sustainability performance. This is discussed below.
- 4.3.7. **Option A emerges as the more favourable option across the following themes: Air, Land, Soil and Water Resources, Biodiversity, Climate Change (Including Flood Risk), Historic Environment and Landscape.** In comparison to Option B, a lower growth option (Option A) will likely require a smaller area of land clearance, which will reduce the severity of effects on local resources, landscape, and heritage assets and their setting. Additionally, due to the smaller influx of people into the neighbourhood area associated with Option A, impacts on local services, facilities, and travel network will also be reduced when compared to a larger growth option if the necessary capacity upgrades are not delivered alongside the development. Finally, a lower levels of growth is also associated with a lower carbon footprint, from reduced energy consumption and transport journeys during construction and operation.

- 4.3.8. **Option B performs more favourably than Option A with respect to the Community Wellbeing and Transportation SEA theme.** This is because the higher growth scenario will likely trigger the need to deliver homes in affordable tenures, which unlikely to be the case for Option A. With affordability of homes a key issue, both locally and nationally, Option B would likely deliver significant positive effects for the neighbourhood area.

Preferred Approach for the UNP

- 4.3.9. Given that an objective of the emerging UNP is to ensure '*that future housing development addresses the needs of the changing demographics of the village*', and there is a demonstrated need for affordable homes in the neighbourhood area, Ufford Neighbourhood Plan Steering Group have decided to proceed with **Option B** to ensure that additional homes in affordable tenures can be secured in the neighbourhood area.

Appraisal Part 2: Consideration of site options

Site Availability within the neighbourhood area

- 4.3.10. East Suffolk's 2018 SHELAA identifies seven sites within Ufford as potentially suitable for development (for various uses); these are listed in **Table 4-8**, below.

Table 4-8: Sites Identified As Potentially Suitable for Development in the East Suffolk SHELAA (2018)

SHELAA Site Reference	Address	Site Area (ha)	Proposed Use	Existing Use
177	Land opposite the depot Yarmouth Road, Ufford	8.99	Employment / Mixed Use / Football club	Former nurseries (disused)
420	Land east of Crownfields	2.88	Housing	Agricultural land and business uses
424	Land off Barrack Lane, Ufford, IP13 6DU	1.46	Housing	Vacant land
512	Land at Lodge Road, Ufford	1.15	Housing	Agriculture
556	Grove Farm	30.44	Housing/Business and office	Agriculture

SHELAA Site Reference	Address	Site Area (ha)	Proposed Use	Existing Use
561	Crown Nursery, High Street	4.95	Housing/Open Space/Office/Care Home	Employment (nursery)
1054	Land adj. Copse Corner, Byng Hall Road, Ufford	5.10	Housing	Agriculture

4.3.11. Since the publication of the SHELAA, Ufford Neighbourhood Plan Steering Group have reached out to the landowners of these sites to confirm availability and support for a potential UNP allocation (including an indication of preferred uses). Community engagement on the sites has also been completed to establish potential site preferences. Five sites have since been discounted following this process

4.3.12. On this basis, the SEA has considered the relative sustainability merits of the remaining two sites in the neighbourhood area which may be taken forward as a UNP allocation. A straight site assessment has been undertaken, with the constraints and opportunities for each site discussed under each SEA theme. The assessments undertaken through the SEA have been undertaken separately to the initial site options and assessment process completed by the Steering Group.

4.3.13. Details of the two sites being assessed are presented below in **Table 4-9** and shown in **Figure 4-1**. The assessment findings which follow are presented in **Table 4-10** and **Table 4-11**.

Table 4-9: Sites Taken Forward for Further Consideration Through the SEA

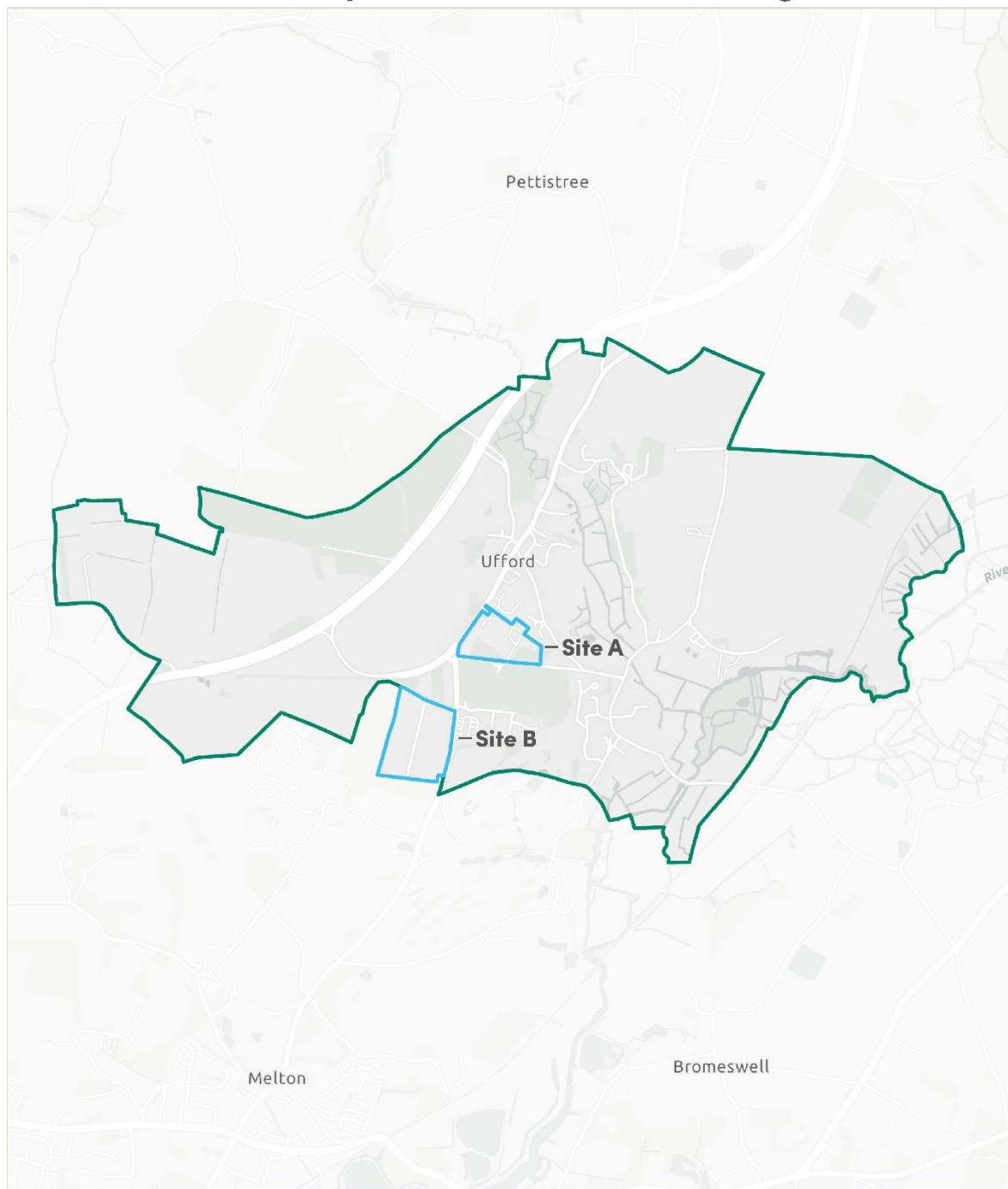
SEA ID	Name of Site, Address	Size (Ha) ¹⁷	Indicative Capacity
Site A¹⁸	Former Crown Nursery, Yarmouth Road	4.95	24 homes
Site B	Notcutts Nursery, Yarmouth Road	8.99	20-25 homes

¹⁷ Represents total site size and not necessarily the total developable area.

¹⁸ It should be noted that at the time of writing, the Site A has been granted permission for commercial uses. The landowner is open to discussions for potential housing at this location, and East Suffolk Council have indicated that they would support a housing allocation at this location.

Figure 4-1: Shortlisted Site Options Considered Through the SEA

Shortlisted site options considered through the SEA



 Neighbourhood area boundary
Site A: Crown Nursery
Site B: Notcutts

AECOM

Note: Site B's southern and western boundary overlap with the neighbourhood area boundary

Table 4-10: Assessment Findings – Site A

SEA Theme Site A: Former Crown Nursery



Air Quality,
Land, Soil, and
Water
Resources

There are no air quality management areas (AQMA) within Ufford; as such, allocating any site for development would not contribute to air quality concerns in the neighbourhood area. The closest AQMA to the neighbourhood area is 3 km south-west, in Woodbridge. The latest air quality annual status report (ASR) (from 2023) indicates the monitoring station recorded concentrations below the annual mean concentration target for nitrogen dioxide (NO₂). Nonetheless, allocating this site for housing development would result in more traffic on the roads, and a subsequent increase in NO₂, which will likely to have a negative effect on the local air quality. However, given the size of the site, the new development area could support opportunities for on-site green infrastructure enhancements which would help to absorb pollutants and improve air quality at the local level and mitigate this impact. As such, uncertainty remains for air quality.

The indicative Agricultural Land Classification (ALC) for the Eastern region of England provided by Natural England identifies that the site is on Grade 3 'Good to Moderate' agricultural land, which will be permanently lost during development. Without a detailed assessment it is not possible to determine if this is Grade 3a (BMV) or 3b (not BMV) land, so there remains uncertainty regarding whether or not BMV land will be permanently lost.

The East Suffolk 2019 SHELAA notes that the site has a record of land contamination (no additional details are recorded).

With regard to water resources, Site A contains a pond, and 170 m west are streams connected to Byng Brook (although between the site and Byng Brook are other residential properties and a road). The site is also located within the Byng Brook operational catchment. It will be important for development to ensure water runoff does not enter the pond or streams to avoid adverse effects.

Overall, **uncertain effects** are concluded to be the most likely if this site was taken forward.

SEA Theme Site A: Former Crown Nursery

Biodiversity	<p>The closest internationally/nationally designated site for biodiversity conservation to Site A is Deben Estuary (a Ramsar site, Special Protection Area (SPA), and SSSI), located 1.9 km south. There are several other internationally/nationally designated sites within 5 km of Site A. Due to its proximity to SSSIs, Site A falls within an SSSI IRZ for all planning applications (except householder applications). Development at this site, therefore, could lead to negative effects on biodiversity. As allocating this site for development could result in increased pressure on a SSSI designation, consultation with Natural England will be required.</p> <p>With regard to features present within and surrounding the site, BAP Priority Habitat can be found in, and surrounding, the site. Within the site, a strip of traditional orchard BAP habitat can be found by its western boundary, and deciduous woodland BAP habitat by its western boundary. Additional deciduous woodland and wood pasture and parkland BAP habitat can be found adjacent (south and to the east) to the site to the site. Due to the presence of BAP priority habitats within the site boundary, it is possible that development at this site would lead to direct adverse effects to these habitats. The BAP habitats near Site A also have the potential to be indirectly impacted by development through increased noise and light pollution.</p> <p>There is vegetation within the site that should be retained and enhanced as far as possible to avoid biodiversity impacts and to help deliver biodiversity connectivity and net gains. This is especially important as the southern half of Site A is marked as a green corridor in Ufford's Environmental Report.¹⁹</p> <p>Overall, negative effects are considered likely if development comes forward on this site. This reflects the proximity of the site to several international / national designations, and the BAP Priority Habitats surrounding the site boundary.</p>
Climate Change	<p>Development of this site will lead to inevitable increases in greenhouse gas emissions, linked to the construction phase of development, the increase in the built footprint of Ufford, as well as an intensification of use at this site. As this site is of a relatively small scale, the potential increase in greenhouse gas emissions is not likely to be significant. Additionally, the site is located adjacent to bus stops, which will allow residents ease of access to the local public transport, which may reduce the number of private vehicle trips.</p> <p>Regarding flood risk, the site and its surrounding area is wholly within Flood Zone 1 and as such is at low risk of fluvial flooding. The majority of the site is also mostly at very low risk of surface water flooding; however, the central and southern areas of the site are noted to be at high and medium risk for surface water flooding. It is noted that such risks can be mitigated through avoiding developing this part of the development site, or by including appropriate design elements such as the inclusion of sustainable drainage systems (SuDS).</p> <p>Overall, given any level of growth in Ufford will lead to an increase in CO₂ emissions, and the presence of high surface water flood risk within the site boundary, uncertain effects are concluded most likely for this SEA theme if this site was taken forward for development. The extent to which the options have the potential to support climate change mitigation and adaptation efforts depends on the specific location, design, layout and scale of development, and the inclusion of features to support climate resilience.</p>

¹⁹ Ufford Neighbourhood Plan Steering Group (2023). 'Environmental Report' can be accessed [here](#).

SEA Theme Site A: Former Crown Nursery

Community Wellbeing and Transportation

Ufford is amongst the 20% most deprived neighbourhoods in England for access to housing and services domain, according to the latest Index of Multiple Deprivation (IMD) results). Therefore, there is a need for additional housing, especially affordable housing. As the indicative capacity for the site is larger than nine, this would trigger SCLP Policy 5.10's requirement to deliver one in three units in affordable tenures. The delivery housing, especially those in affordable tenures, will help to address local needs, providing long term positive effects for the local area.

Ufford has a limited range of services and facilities located within the neighbourhood area, meaning residents usually travel to the wider area to access these. Consequently, due to the location of the development, it is likely there will still be a continued reliance on private vehicles to access locations and services outside the neighbourhood area; however, this would be an issue across the neighbourhood area. Site A is relatively well positioned to benefit from the services, facilities, and public transport options within the neighbourhood area, being located adjacent to Ufford's settlement boundary. The site benefits from being within a ten-minute walk to services and facilities along the B1438 and The Avenue, and is also located adjacent a bus stop (served by the 63 and 64 services, which offer school services and journeys to Ipswich and Aldeburgh on weekdays and Saturdays).

Access to the local road network is good at this site, being located adjacent to the B1438 (although it is noted that existing access to the site would have to be modified to accommodate an increased level of use). This is one of the neighbourhood area's most well-connected roads, passing through the Ufford village, and connecting to the A12, which continues to Lowestoft to the north and Ipswich to the south. Whilst the introduction of additional vehicles on local roads could lead to an increase in congestion, the risk of this is low as congestion is not currently understood to be an issue on the B1438 and the proposed level of development is relatively small.

Overall, **positive effects** are considered likely if this site is allocated for development. Firstly, the site will deliver houses (of which a proportion will be offered in affordable tenures) that will help address local need. Also, the site's location is relatively well positioned to benefit from the services and facilities that are present in the neighbourhood area, and is also located well to benefit from local public transport options and the local road network.

Historic Environment

This site is not located in proximity to any international, national, or local historic environment designations, nor does it sit within the setting of any historical conservation areas in Ufford.

Within 50 m of the site there are several monuments listed on the Suffolk Heritage Explorer,²⁰ including an iron age pit and a roman or saxon artefact. Consequently, other artefacts may be present on the site; if any are encountered during construction, advice from an archaeologist should be sought.

Overall, **neutral / no effects** are concluded likely for this SEA theme.

²⁰ Suffolk HER (2024). 'Suffolk Heritage Explorer' can be accessed [here](#).

SEA Theme Site A: Former Crown Nursery

Landscape	<p>Suffolk Coast & Heaths National Landscape (NL) is located 2.3 km south and east of Ufford. Effects on views from the NL are likely to be limited due to the existing built form and woodland to the south and east of this site, as well as the site being located on a similar elevation to the designation. Additionally, being located adjacent to Ufford's settlement boundary, the site adjoins existing development to the north, which will reduce the impact on views into the neighbourhood area.</p> <p>The site is constrained by the presence of Tree Preservation Orders (TPOs) that are found on the site's north-eastern border. Whilst these TPOs are outside of Site A's boundary, their root protection zones extend into the site; therefore, direct effects to the TPOs are still possible from development at this site.</p> <p>With regard to topography at a neighbourhood area scale, Site A is located between high ground to the west and low ground to the east. Development of this site may impact on views from the east of this site, although, the tree cover to the east of the site will likely lessen these impacts.</p> <p>Overall, neutral / no effects are considered likely if this site is allocated. This reflects the site's position being located adjacent to Ufford's settlement boundary (and therefore, adjacent to other housing developments) and being sheltered by trees to the south and east.</p>
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Key

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

Table 4-11: Assessment Findings – Site B

SEA Theme Site B: Notcutts Nursery



Air Quality, Land, Soil, and Water Resources

There are no air quality management areas (AQMA) within Ufford; as such, allocating any site for development would not contribute to air quality concerns in the neighbourhood area. The closest AQMA to the neighbourhood area is 3 km south-west, in Woodbridge. The latest air quality annual status report (ASR) (from 2023) indicates the monitoring station recorded concentrations below the annual mean concentration target for nitrogen dioxide (NO₂). Nonetheless, allocating this site for housing development would result in more traffic on the roads, and a subsequent increase in NO₂, which will likely to have a negative effect on the local air quality. However, given the size of the site, new development areas could support opportunities for on-site green infrastructure enhancements which would help to absorb pollutants and improve air quality at the local level. As such, uncertainty remains for air quality.

The indicative ALC for the eastern region provided by Natural England identifies that the majority of the site falls within Grade 3 'Good to Moderate' land, which will be permanently lost during development. Without a detailed assessment it is not possible to determine if this is Grade 3a (BMV) or 3b (not BMV) land, so there remains uncertainty regarding whether or not BMV land will be permanently lost for this part of the site. The north-western corner of the site is noted to be Grade 2 'Very Good' land, which is BMV land. Therefore, development in this corner of the site is likely to result in the permanent loss of BMV land.

SEA Theme Site B: Notcutts Nursery

Air Quality, Land, Soil, and Water Resources (cont....)	<p>The East Suffolk 2019 SHELAA notes that the site has a record of land contamination from the presence of Acid Dispenser Compound. Additionally, the site is located adjacent to a historic landfill site on its southern border ('St Audrey's Hospital', used for household waste). Consequently, there may be additional land contamination issues on/near the site.</p> <p>With regard to water resources, located within the site are two reservoirs, one on the site's northern boundary and one on the site's southern boundary. The southern reservoir is designed to catch excess water run-off from the irrigation system used in the nursery but is currently empty. The northern reservoir is currently full and is topped up from Artesian wells on the western boundary of the site. The site is also located within the Deben (Brandeston Bridge - Melton) operational catchment. It will be important for the development to ensure water runoff does not enter the pond or streams to avoid adverse effects.</p> <p>Overall, negative effects are concluded to be the most likely if this site was taken forward due to presence of BMV land and water resources within boundary.</p>
Biodiversity	<p>The closest internationally/nationally designated site for biodiversity conservation to Site B is Deben Estuary (a Ramsar site, Special Protection Area (SPA), and Site of Special Scientific Interest (SSSI)), located 1.5 km south. There are several other internationally/nationally designated sites within 5 km of Site B. Due to its proximity to SSSIs, Site B falls within an SSSI Impact Risk Zones (IRZs) for all planning applications (except householder applications). Development at this site, therefore, could lead to negative effects on biodiversity. As allocating this site for development could result in increased pressure on a SSSI designation, consultation with Natural England will be required.</p> <p>With regard to features present within and surrounding the site, no Biodiversity Action Plan (BAP) Priority Habitat is located within the site; however, Site B is bordered by BAP habitat on its north, west, and southern boundaries. Firstly, adjacent to Site B's southern and western border is deciduous woodland Biodiversity Action Plan (BAP) Priority Habitat. To the north of the site, over Old Bredfield Road, is traditional orchard BAP priority habitat. Finally, to the north-east, over Yarmouth Road, can be found wood-pasture and parkland BAP priority habitat. Although direct impacts to these BAP habitats are unlikely from development on Site B, given their close proximity to the site, there remains potential for these habitats to be disturbed by development on this site through increased noise and light pollution.</p> <p>There is also vegetation within Site B's boundary that should be retained and enhanced as far as possible to avoid biodiversity impacts and to help deliver biodiversity connectivity and net gains. This is especially important as the entire border of Site B overlaps with an area marked as a green corridor in Ufford's Environmental Report.²¹</p> <p>Overall, negative effects are considered likely if development comes forward on this site. This reflects the proximity of the site to several international / national designations, and the additional BAP Priority Habitats within the site boundaries as well as in proximity.</p>

²¹ Ufford Neighbourhood Plan Steering Group (2023). 'Environmental Report' can be accessed [here](#)

SEA Theme Site B: Notcutts Nursery

Climate Change	<p>Development of this site will lead to inevitable increases in greenhouse gas emissions, linked to the construction phase of development, the increase in the built footprint of Ufford, as well as an intensification of use at this site. As this site is of a relatively small scale, the potential increase in greenhouse gas emissions is not likely to be significant. Additionally, the site is located adjacent to bus stops, which will allow residents ease of access to the local public transport, which may reduce the number of private vehicle trips.</p> <p>Regarding flood risk, the site and its surrounding area is wholly within Flood Zone 1 and as such is at low risk of fluvial flooding. The majority of the site is also mostly at very low or low risk of surface water flooding; however, there are two small areas of medium surface water flood risk located on the site's southern border. A small area at high risk of surface water flooding is also located adjacent to the south-eastern border of the site. It is noted that such risks can be mitigated through avoiding developing this part of the development site, or by including appropriate design elements such as the inclusion of sustainable drainage systems (SuDS).</p> <p>Overall, given any level of growth in Ufford will lead to an increase in CO₂ emissions, and the presence of medium surface water flood risk within the site boundary, uncertain effects are concluded most likely for this SEA theme if this site was taken forward for development. The extent to which the options have the potential to support climate change mitigation and adaptation efforts depends on the specific location, design, layout and scale of development, and the inclusion of features to support climate resilience.</p>
Community Wellbeing and Transportation	<p>Ufford is amongst the 20% most deprived neighbourhoods in England for access to housing and services domain, according to the latest Index of Multiple Deprivation (IMD) results). Therefore, there is a need for additional housing, especially affordable housing. As the indicative capacity for the site is larger the nine, this would trigger SCLP Policy 5.10's requirement to deliver one in three units in affordable tenures. The delivery housing, especially those in affordable tenures, will help to address local needs, providing long term positive effects for the local area.</p> <p>Ufford has a limited range of services and facilities located within the neighbourhood area, meaning residents usually travel to the wider area to access these. Consequently, due to the location of the development, it is likely there will still be a continued reliance on private vehicles to access locations and services outside the neighbourhood area; however, this would be an across the neighbourhood area. Site B is well positioned to benefit from Ufford's public transport options, being located adjacent a bus stop (served by the 63 and 64 services, which offer school services and journeys to Ipswich and Aldeburgh on weekdays and Saturdays). The site benefits from being within a 15-minute walk to many of Ufford's services and facilities; however, there is no existing public footpath between the site and the existing footpath network.</p>

SEA Theme Site B: Notcutts Nursery

Community Wellbeing and Transportation (cont.....)	<p>Access to the local road network is good at this site, being located adjacent to the B1438 (although it is noted that existing access to the site would not be suitable for the increased level of use). This is one of the neighbourhood area's most well-connected roads, passing through the Ufford village, and connecting to the A12, which continues to Lowestoft to the north and Ipswich to the south. Whilst the introduction of additional vehicles on local roads could lead to an increase in congestion, the risk of this is low as congestion is not currently understood to be an issue on the B1438 and the proposed level of development is relatively small.</p> <p>Overall, positive effects are considered likely if this site is allocated for development. Firstly, the site will deliver houses (of which a proportion will be offered in affordable tenures) that will help address local need. Also, the site's location is relatively well positioned to benefit from local public transport options and the local road network.</p>	
Historic Environment	<p>This site is not located in proximity to any international, national, or local historic environment designations, nor does it sit within the setting of any historical conservation areas in Ufford.</p> <p>The Suffolk Heritage Explorer (SHE),²² records one monument within the site boundary – a token halfpenny from 1668. The SHE also records several other monuments within 50 m of the site. If any historic artefacts are encountered during construction, advice from an archaeologist should be sought.</p> <p>Overall, neutral / no effects are concluded likely for this SEA theme.</p>	
Landscape	<p>Suffolk Coast & Heaths National Landscape (NL) is located 2.2 km south and east of Ufford. Effects on views from the NL are likely to be limited due to the existing non-residential built form and woodland to the south and east of this site, as well as the site being located on a similar elevation to the designation. Additionally, the site is near to existing development to the east, which will reduce the impact on views into the neighbourhood area.</p> <p>With regard to topography at a neighbourhood area scale, Site B is located between high ground to the west and low ground to the east. Development of this site may impact on views from the east of this site, although, screening from tree cover and nearby existing development will likely lessen these impacts.</p> <p>The site is not within or adjacent to Ufford's settlement boundary. Consequently, this could have adverse effects on the local landscape, despite the cover offered by surrounding vegetation.</p> <p>Whilst the site benefits from screening from vegetation and non-residential developments, adverse effects (without mitigation measures) are considered likely if this site is allocated. This reflects the site's position as away from the settlement boundary of Ufford.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral / no effect		Uncertain effect

²² Suffolk HER (2024). 'Suffolk Heritage Explorer' can be accessed [here](#).

Summary of Site Option Appraisal Findings

4.3.14. A summary of the findings is presented in **Table 4-12** below. This provides an indication of how the sites have performed in relation to each of the SEA themes, with the colouring as follows:

- Green: likely positive effects resulting from an allocation at this location.
- Yellow: likely to be limited or no effects resulting from an allocation at this location.
- Blue: likely to be uncertain effects resulting from an allocation at this location (i.e., there are constraints, but the effects are perhaps dependent or influenced on the design and mitigation measures which could brought forward as part of a proposal); and
- Red: likely negative effects resulting from an allocation at this location.

Table 4-12: Summary of SEA Site Appraisal Findings

Site	Air Quality, Land, Soil, and Water Resources	Biodiversity	Climate Change	Community Wellbeing and Transportation	Historic Environment	Landscape
A						
B						
Key						
Likely adverse effect				Likely positive effect		
Neutral / no effect				Uncertain effect		

4.3.15. Whilst uncertainty remains for both sites **with regard to the Air Quality, Land, Soil, and Water Resources theme, Site A performs slightly more favourably than Site B**, mostly due to the grade of agricultural land that underlies the site. Whilst there is potential for BMV land to be permanently lost at both sites, there is a higher likelihood that Site B would result in more BMV land being lost, due to the presence of Grade 2 agricultural land within its boundaries. There is also more potential for land contamination issues at Site B, given the presence of a historic landfill site on its southern boundary. Finally, local air quality and water resources have the potential to have similar adverse effects as a result of development at the two sites; however, mitigation could be designed-in (i.e., via natural drainage solutions) to alleviate the flood risk issues.

4.3.16. Regarding the Biodiversity theme, both sites have the potential for adverse effects (without mitigation measures). This is primarily due to the proximity of internationally and nationally designated conservation sites to both sites, as demonstrated by their inclusion within an SSSI IRZ that includes residential developments. Additionally, both sites are identified to contain

green corridors in Ufford's Environmental Report. While both sites have the potential to indirectly impact BAP Priority habitats surrounding them, Site A presents a greater risk of direct effects on these habitats due to their presence within its site boundary (whereas there are no BAP Priority habitats within Site B). For this reason, **Site B is a more favourable option with respect to the Biodiversity theme.**

- 4.3.17. As the indicative capacity at both locations is similar (between 20-25 homes), their construction and operational carbon footprint are likely to be comparable. However, due to Site A's closer proximity to the settlement of Ufford, it is expected to generate more active transport journeys, potentially leading to a reduction in overall emissions when compared to Site B. With regard to flood risk, both sites contain areas of high and medium surface water flood risk. It should be noted that adverse effects related to surface water flooding can be avoided through the design interventions or by avoiding vulnerable areas of the site. **Overall, for the Climate Change theme, both sites perform equally, with uncertainty remaining.**
- 4.3.18. Housing availability and affordability is an issue in Ufford; both sites would deliver houses in market and affordable tenures, which would help to address an identified need in the local community and provide significant beneficial effects. Regarding transport links, both sites benefit from being located on the B1438 and adjacent to bus stops, which provide access within Ufford and to the wider area. Regarding accessibility to Ufford's amenities by foot, Site A is connected to the village by an existing footpath. For this reason, **Site A is a more favourable option than Site B for the Community Wellbeing and Transport theme.**
- 4.3.19. **Both sites perform similarly with respect to the Historic Environment theme** as development at neither site is anticipated to result in any adverse effects on the integrity or setting of any nationally designated heritage assets. Regarding non-designated heritage assets, applications for new development within the neighbourhood area (particularly associated with Site B) should ensure that archaeological finds (including details of their significance) are appropriately recorded in line with best practice guidance.
- 4.3.20. **From a Landscape perspective, both sites have the potential for adverse effects, although Site A is likely to have a comparatively smaller adverse impact** due to its proximity to the existing built-form of the village. Both sites have the potential to impact views from the Suffolk Coast & Heaths NL, which may lead to adverse impacts in the absence of mitigation (e.g., from visual screening). However, both sites are sheltered by other developments or vegetation, and are not positioned at a higher elevation than the NL, reducing the potential significance of any effects.
- 4.3.21. Overall, the appraisal findings highlight that 'uncertain effects' and 'likely adverse effects (without mitigation measures)' are likely for both sites under one or more SEA themes. If the emerging UNP takes forward either of these sites, it will be important for new development areas to appropriately address any concerns or constraints associated with the sites.

Preferred Approach for the UNP

- 4.3.22. The preferred approach for the UNP is to allocate Site A (the 'Former Crown Nursery' site) for new development totalling between 20-25 homes (including a percentage of affordable homes). The preferred approach has been informed by the various surveys and evidence base documents prepared to support the Neighbourhood Plan (to date), responses from community consultation events, and the SEA findings.
- 4.3.23. It is recognised that Site A has been granted permission for commercial uses. The landowner is open to discussions for potential housing at this location, and East Suffolk Council have indicated that they would support a housing allocation at this location. On this basis, it is anticipated that engagement will take place between the Steering Group and the site developer with respect to the design of the proposed scheme. Design Guidelines and Codes²³ have been established for the neighbourhood area with a view to shaping the way new development is brought forward during the plan period.
- 4.3.24. The site-specific policy for the proposed site allocation within the UNP (see Policy UFF16: Former Crown Nursery Site) contains further detail with respect to design and mitigation considerations which aim to address any potential constraints to development. These aspects are further discussed within the plan appraisal section of the Environmental Report (presented in **Chapter 5**, below).

²³ AECOM (2023): 'Ufford Design Guidelines and Codes', accessible [here](#)

5. Appraisal of the submission version of the UNP

5.1. Introduction

- 5.1.1. The aim of this chapter is to present appraisal findings and recommendations in relation to the proposed submission version of the UNP. This chapter presents:
- An appraisal of the policies and proposals within the UNP under each SEA theme.
 - Consideration of potential cumulative effects; and
 - The overall conclusions at this current stage.

5.2. Ufford Neighbourhood Plan Policies

- 5.2.1. To support the implementation of the vision statement for the UNP, the proposed submission version of the plan puts forward 16 policies to help shape new development within the neighbourhood area. Specifically:

Table 5-1: Policies in the Ufford Neighbourhood Plan

Policy Reference	Policy Name
Policy UFF1	Design
Policy UFF2	New housing
Policy UFF3	Housing mix
Policy UFF4	Rural and community-led exception sites
Policy UFF5	Local Green Spaces
Policy UFF6	Landscape character
Policy UFF7	Important views
Policy UFF8	Biodiversity/nature conservation
Policy UFF9	Ecological corridors
Policy UFF10	Historic environment
Policy UFF11	Non-designated Heritage Assets
Policy UFF12	Dark skies

Policy Reference	Policy Name
Policy UFF13	Access and connections
Policy UFF14	Community facilities
Policy UFF15	New and existing business
Policy UFF16	Former Crown Nursery

5.3. Approach to the Appraisal

- 5.3.1. For each theme, ‘significant’ effects of the proposed submission version of the UNP on the baseline are predicated and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. For example, account is taken of the probability, duration, frequency, and reversibility of the effects as far as possible. These effect ‘characteristics’ will be described within the assessment, as appropriate.
- 5.3.2. Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high-level nature of the UNP. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects to ensure all assumptions are explained. 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 plan in more general terms.
- 5.3.3. Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. 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 UNP 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.

5.4. Air, Land, Soil, and Water Resources

- 5.4.1. With regard to land and soil resources, the site allocated under Policy UFF16 is likely underlain by Grade 3 ‘Good to Moderate’ agricultural land, avoiding the neighbourhood area’s best agricultural land (Grade 2 – Very Good). The Grade 3 land has the potential to be BMV land. However, without a detailed assessment, there remains uncertainty as to whether this land is BMV or not. Therefore, there is the potential for productive agricultural land loss through developing this site which cannot be mitigated. It is important to note that the site was a former garden nursery, so some of the site has previously been developed on, which will already reduce the size of the potential area of BMV agricultural land.

- 5.4.2. More broadly, there are several policies in the UNP (UFF5: Local Green Spaces, UFF8: Biodiversity/nature conservation and UFF9: Ecological corridors) which aim to protect and expand local green infrastructure networks. This will indirectly protect land and soil resources across the neighbourhood area. By doing this, it will help support the capacity of the neighbourhood area to regulate soil and water quality.
- 5.4.3. In order to protect water resources across the entire neighbourhood area, Policy UFF1: Design supports developments that are resilient to climate change by including design elements such as water capture, grey water recycling and water saving. Additionally, Policy UFF1 supports developments that incorporate sustainable drainage systems. Collectively, these will help to reduce the potential adverse effects of developments on the local area's water resources. With respect to the proposed allocation, Policy UFF16 also states that separate water systems for surface water and foul water will be provided as part of the development. This will ensure that local water systems will not be adversely affected by the development.
- 5.4.4. There are no direct references to air quality in the UNP; however, Policy UFF13 will indirectly support local air quality improvements in the neighbourhood area (and its surroundings) by improving local active travel networks. It is also worth noting that air quality is not a significant issue in the neighbourhood area, given the absence of any AQMAs or recorded exceedances in air quality standards.

5.5. Biodiversity

- 5.5.1. Given the proximity of the neighbourhood area to internationally and nationally designated sites for biodiversity and geodiversity, a Habitats Regulation Assessment (HRA) process has been completed for the UNP²⁴. The HRA concludes:

Policies UFF2: New Housing and UFF16: Former Crown Nursery Site were identified as having potential Likely Significant Effects on Habitat Sites as the result of increased recreational disturbance. As a result, both policies were subject to further consideration through appropriate assessment.

The impact of increased recreation arising from housing growth has already been recognised in Local Plan HRA work. This has led to collaborative working between the four Suffolk local planning authorities that lie within 13km of the coastal and heathland Habitat Sites. Taking a strategic approach to the Habitat Site mitigation has resulted in the development of the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS).

The Strategy sets out a tariff-based approach to mitigating the additional recreation pressure risks associated with new residential development. The RAMS sets out an integrated suite of avoidance and mitigation measures that are supported by comprehensive evidence and experience gained from other Habitat Site mitigation strategies.

²⁴ East Suffolk Council (April 2024): 'HRA Screening Statement and Appropriate Assessment for the UNP'

As confirmed by the conclusions of the Suffolk Coastal Local Plan HRA, The Suffolk Coast RAMS is considered to provide adequate measures to mitigate any impacts arising from planned housing growth.

- 5.5.2. In light of the above conclusions from the HRA, it is anticipated that there would be no adverse effects to the integrity of these sites, either alone or in-combination with other plans and projects, associated with the policies and proposals within the UNP. However, as the proposed site allocation seeks to deliver 20-25 new homes and is within an SSSI IRZ for residential development, further consultation with Natural England might be required to determine whether the applications will have any significant impacts to the integrity of nationally designated sites in proximity to Ufford.
- 5.5.3. In light of the key sensitivities listed above, and the rural setting of the neighbourhood area, a key objective within the UNP is to protect and enhance the natural environment. This is recognised and acknowledged within several policies which will help limit potential effects on features and areas of ecological interest and support the resilience of green infrastructure networks. This is discussed below.
- 5.5.4. With respect to the housing allocation in Policy UFF16, development at the site will aim to retain all existing trees and hedges and will only remove these features if specific justification is given and compensatory measures provided. This is especially important in the western extent of the site where there is a Biodiversity Action Plan designation for Traditional Orchard habitat. Woodland and ponds adjacent to the site, which is designated as a wildlife corridor in the local Environmental Report,²⁵ will be conveyed to Ufford Parish Council to ensure the safeguarding of these local ecologically important areas.
- 5.5.5. The nature, scale, timing, and duration of some development activities can result in the disturbance of protected species. This can include effects of poor air quality on designated sites, and severance of ecological networks from new development areas. In this respect, the UNP also sets out provisions which will support and enhance habitats, species, and ecological networks. A key policy in this respect is UFF8: Biodiversity/nature conservation, which confirms that development must protect and enhance biodiversity to ensure an overall biodiversity net gain. This is complemented by Policies UFF5: Local Green Spaces and UFF9: Ecological corridors, which identify, and protect, particularly sensitive sites for ecological conservation in the neighbourhood area. The inclusion of UFF12: Dark skies is also valuable in reducing adverse effects from developments on local fauna.
- 5.5.6. Overall, UNP policies should help ensure that ecological sensitivities are appropriately considered during the planning, construction, and operational phases for new development proposals which come forward during the plan period, while also delivering net gains.

²⁵ Ufford Neighbourhood Plan Steering Group (2023). 'Environmental Report' can be accessed [here](#).

5.6. Climate Change (Including Flood Risk)

- 5.6.1. In response to the UK Government's commitment to tackling the climate crisis, East Suffolk Council declared a Climate Emergency in 2019, which commits the district on a pathway towards carbon neutrality by 2030. As such, the UNP should encourage design features that help the area to mitigate and adapt to climate change and increase the resilience of the neighbourhood area and its community. Such features are included in several UNP policies.
- 5.6.2. Firstly, Policy UFF1 Design supports developments that: incorporate energy efficient construction; are designed to include renewable energy generation systems and electric charging points; are designed to be resilient to climate change and the associated flooding and temperature changes; and incorporate sustainable drainage systems to increase further resilience to flooding. Overall, these will ensure that proposals minimise their carbon footprint during their construction and use.
- 5.6.3. The extent to which the UNP has the potential to support climate change mitigation efforts is dependent (in part) on a distribution strategy which promotes development at locations in closer proximity to the existing services and facilities in the neighbourhood area. The proposed site allocation in UFF16 is located adjacent to existing village, meaning that most of the neighbourhood area's existing services and facilities are within a 10-minute walking distance (with the site already benefiting from pedestrian access along a footpath adjacent to the B1438). Improvements to the local active travel network (through Policy UFF13 and the allocation in Policy UFF16) will also make active travel a more attractive option within the neighbourhood area. Additionally, the allocation site benefits from being located adjacent to a bus stop, which will facilitate access to the local public transport network and provide an alternative option to travel by private vehicle. In summary, these provisions will support a limitation of emissions by encouraging opportunities to engage with sustainable and active travel within the neighbourhood area.
- 5.6.4. While there are areas of Ufford that are located within Flood Zone 3 (the highest rating for risk of flooding from rivers), the allocation within Policy UFF16 avoids this area, and is located in Flood Zone 1. Despite this, there are surface water flood issues on site, with a small area of the site partially overlapping with an area at high risk for surface water flooding. Policy UFF16 seeks to alleviate the flood risk potential by implementing a sustainable drainage scheme to address these potential flooding issues.
- 5.6.5. With further emphasis on adapting to the impacts of climate change, UNP policies related to the conservation/enhancement of the local green infrastructure network within the neighbourhood area (UFF5: Local Green Spaces, UFF8: Biodiversity/nature conservation and UFF9: Ecological corridors) will positively respond to the potential effects of climate change (particularly from extreme weather events) through providing summer shading and shelter and reducing surface water run-off issues.

5.7. Community Wellbeing and Transportation

- 5.7.1. The preferred approach for the UNP is to allocate the 'Former Crown Nursery' site for new development totalling between 20-25 homes (including a percentage of affordable homes to address local needs identified within the HNA). The choice of site allocation has been informed by the various surveys and evidence base documents prepared to support the UNP, responses from community consultation events, and the SEA findings. This is further discussed within **Chapter 4** of the Environmental Report, presented above.
- 5.7.2. More broadly in terms of housing provision, the UNP also supports opportunities for small infill (no more than six dwellings) and rural development sites for small-scale affordable housing schemes. Such developments will be judged on their merits and will be expected to meet all of the relevant development criteria within Policy UFF2: New housing and Policy UFF4: Rural and community led exceptions sites, respectively.
- 5.7.3. The UNP also ensures that new housing will reflect the needs of the neighbourhood area through Policy UFF3: Housing mix, which prioritises smaller to medium sized dwellings in new developments. For new dwellings in affordable tenures, the policy outlines that 50% should be in affordable rent tenures, with the other 50% in affordable ownership tenures.
- 5.7.4. The UNP also seeks to safeguard the neighbourhood area's existing community infrastructure through Policy UFF14: Community facilities from adverse effects posed by any potential developments in the area. Additionally, development that provides new facilities or enhances existing local facilities will be supported.
- 5.7.5. The UNP also seeks to promote the economic vitality of the neighbourhood area and support employment opportunities, specifically through Policy UFF15: New and existing business. By supporting new appropriate businesses, supporting proposals for the small-scale expansion of existing businesses, and facilitating opportunities to work from home and support remote working, this will help to maintain and revitalise the local economy.
- 5.7.6. Regarding accessibility within the neighbourhood area, Policy UFF13: Access and connections seeks to encourage opportunities to help increase sustainability, connectivity, and accessibility (where possible). A particular focus of the policy is to make the neighbourhood area more attractive for walkers and cyclists. The housing allocation in Policy UFF16 requires that the new development includes safe and convenient pedestrian and cycle access from Yarmouth Road through the site to the adjacent recreation ground and the wider village and its community facilities. This would help to mitigate the potentially adverse effects on local roads (such as congestion) arising from the influx of new vehicles associated with the new housing development.
- 5.7.7. Consideration has also been given to parking issues in Policy UFF1: Design, which includes design recommendations for new developments to

follow that will help reduce car-related crimes and increase parking availability in key areas of the neighbourhood area (for cars and bicycles).

- 5.7.8. On a broader scale, UNP policies also have a strong emphasis on delivering public realm improvements by protecting and enhancing the local natural, cultural, and historic environment (policies such as UFF5: Local Green Spaces, UFF7: Important views, and UFF10: Historic environment). This will support the quality of life of local residents and visitors to the neighbourhood area.

5.8. Historic Environment

- 5.8.1. The UNP has taken a proactive approach to protecting and enhancing the historic environment. Most notably, this is through two policies under the Environment section: UFF10: Historic environment and UFF11: Non-designated Heritage Assets. Firstly, Policy UFF10 outlines that proposals affecting designated heritage assets will only be supported if they preserve or enhance the asset's significance, retain important buildings, reuse redundant assets, respect local distinctiveness and scale, understand the asset's importance. Policy UFF11 ensures that developments consider locally important heritage assets, designating 15 non-designated heritage assets, which will be an important consideration for any development coming forward that would affect them or their setting.
- 5.8.2. Under the Housing and Design policy section, policies UFF1: Design, UFF2: New housing, UFF4: Rural and community-led exception sites include provisions to ensure that new developments avoid adverse effects on the local historic environment context. Policy UFF1 requires that developments should be architecturally similar to the existing buildings in Ufford (with respect to the design and materials used in the new development), whilst also seeking opportunities to enhance the setting of important heritage assets within the neighbourhood area, where there are opportunities to do so. Policy UFF1, as well as Policy UFF2, also include provisions that require new developments to be proportionate in scale with respect to the historic character of the neighbourhood area, and respectful of the medieval layout of the village and Ufford's existing settlement boundary. Overall, these policies will benefit the historic environment by ensuring new development does not detract from the historic character of the area or the setting of heritage features.
- 5.8.3. With regard to the UNP's site allocation (Policy UFF16), there are no internationally / nationally listed heritage assets or conservation areas within or surrounding the site. Consequently, there are no references to heritage within the policy. However, it is noted that several locally listed monuments on the Suffolk Heritage Explorer have been identified in the surrounding area. On this basis, **the SEA recommends** that additional text could be included in a relevant policy which reflects the potential presence of local monuments, along with precautionary measures should a monument be identified during the construction of the development.

5.9. Landscape

- 5.9.1. The neighbourhood area is located approximately 2 km west of Suffolk Coast & Heaths National Landscape NL. Whilst the proposed site allocation through Policy UFF16 has the potential to have an adverse effect on views towards, and from, the designation, these are unlikely to be significant due to the nature of the development (residential houses), the topography of the site, and the visual screening provided by nearby buildings and trees surrounding the site. Additionally, as specified in the allocation policy (Policy UFF16), the development will safeguard adjacent woodland, which provides valuable screening. The site location is also adjacent to the existing built environment of the village, with new development at this location perhaps less-likely to impact the character of any potential views of the village from within the NL.
- 5.9.2. At the local level, landscape and villagescape character play an important part in understanding the relationship between people and place, identifying recognisable and distinct patterns which make one area different from another. Landscape and villagescape character can assist in the assessment of the likely significance of effects of change resulting from new development areas, both in visual and amenity terms. On this basis, Design Guidelines and Codes²⁶ have been established for the neighbourhood area with a view to shaping the way new development is brought forward during the plan period – including with respect to preserving and enhancing the distinctiveness and qualities of the village.
- 5.9.3. For example, three policies have been included in the UNP that directly address effects of developments on the local landscape and villagescape. Firstly, UFF6: Landscape character protects the landscape and villagescape by prohibiting development within the neighbourhood area that could adversely impact its visual and scenic value, particularly in the Area of Local Landscape Sensitivity along the River Deben valley. It mandates that any acceptable development must include landscape improvements and respect the area's natural and historical significance. Policy UFF7: Important views – ensures that development proposals consider their impact on 15 important public views, and those that would negatively affect the landscape or character of these views are not supported. Policy UFF12: Dark skies also outlines a preference for residential developments to not include streetlights (assuming there are no safety concerns), which will help limit light pollution locally, and preserve the neighbourhood area's intrinsically dark landscapes.
- 5.9.4. Under the Housing and design policies section, Policies UFF1: Design and UFF2: New housing safeguard the landscape and villagescape by ensuring new developments conform to design guidelines that require developments to be in-keeping with the existing historic and rural value of the neighbourhood area through maintaining the medieval layout of the village, focusing on areas within the settlement boundary, community connectivity, and preserving natural views. Where development is proposed outside of

²⁶ AECOM (2023): 'Ufford Design Guidelines and Codes', accessible [here](#)

the settlement boundary, Policy UFF4: Rural and community led exceptions sites stipulates that they do not negatively impact the neighbourhood area's historic or natural assets.

- 5.9.5. Policy UFF8 to Policy UFF11 focus on conserving the neighbourhood area's ecological networks and heritage features, which will also provide an extra layer of protection to the existing rural and historic environment in the neighbourhood area.

5.10. Cumulative effects

- 5.10.1. The UNP seeks to complement the existing Suffolk Coastal Local Plan with detailed local policies and a proposed spatial strategy that aligns with local policy provision. In combination with development in the other parishes surrounding Ufford, however, cumulative impacts in relation to air quality, traffic, and congestion are considered possible in the absence of strategic transport interventions.

5.11. Conclusions at this current stage

- 5.11.1. Overall, **no significant negative effects are considered likely in implementation of the UNP.**
- 5.11.2. **Significant positive effects are expected in relation to the Community Wellbeing and Transportation theme**, through the delivery of local housing in affordable tenures, the safeguarding of existing community services, facilities, and employment areas, and by designating Local Green Spaces. It is recognised that the Design Guidelines and Codes which have been established for the neighbourhood area will also help to shape the way new development is brought forward during the plan period.
- 5.11.3. **Mixed effects are anticipated for the Landscape theme.** Whilst high-quality development is encouraged through the site allocation and design policies, impacts will be dependent on the extent to which the design of the scheme appropriately respects the relationship between the built and natural environment. Nonetheless, it is recognised that impacts are most likely to be positive in light of the policy provisions within the UNP.
- 5.11.4. **Minor positive effects are considered most likely in relation to Climate Change (Including Flood Risk)** by encouraging sustainable transport methods, protecting the neighbourhood area's regulatory ecosystem services and the implementation of a sustainable drainage scheme on the new site allocation.
- 5.11.5. **Moderate positive effects are considered most likely in relation to the Biodiversity theme**, due to the safeguarding of woodland south of the allocation site and designation of green/blue corridors and LGS. In light of the conclusions from the HRA, it is anticipated that there would be no adverse effects to the integrity of European designated sites, either alone or in-combination with other plans and projects, associated with the policies and proposals within the UNP. However, as the proposed site allocation seeks to deliver 20-25 new homes and is within an SSSI IRZ for residential development, further consultation with Natural England might be required to

determine whether the applications will have any significant impacts to the integrity of nationally designated sites in proximity to Ufford.

5.11.6. **Minor negative effects** are predicted in relation to the following SEA themes:

- **Historic Environment**, due to the potential presence of non-designated monuments near to the proposed site allocation; and
- **Air, Land, Soil, and Water Resources** due to the loss of Grade 3 (potentially BMV) agricultural land.

5.11.7. Given that several locally listed monuments on the Suffolk Heritage Explorer have been identified in the area surrounding the proposed site allocation. On this basis, **the SEA recommends** that additional text could be included in a relevant policy which reflects the potential presence of local monuments, along with precautionary measures should a monument be identified during the construction of the development. It is recognised that plan makers have incorporated the recommendation within Policy UFF10 'Historic Environment'.

6. What are the next steps?

6.1. Plan Finalisation

- 6.1.1. This is the version of the SEA Environmental Report which accompanies the UNP for submission to the Local Planning Authority, East Suffolk Council, for subsequent Independent Examination. At Independent Examination, the UNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.
- 6.1.2. If the Independent Examination is favourable, the UNP will be subject to a referendum, organised by East Suffolk Council. If more than 50% of those who vote agree with the UNP, then it will be 'made'. Once made, the UNP will become part of the Development Plan for the parish.

6.2. Monitoring

- 6.2.1. 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 UNP to identify any unforeseen effects early and take remedial action as appropriate.
- 6.2.2. It is anticipated that monitoring of effects of the UNP will be undertaken by East Suffolk Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the UNP that would warrant more stringent monitoring over and above that already undertaken by East Suffolk Council.

