

Strategic Environmental Assessment for the Barrow cum Denham Neighbourhood Plan

Scoping Report

Barrow cum Denham Neighbourhood Plan Steering
Group

June 2020

Quality information

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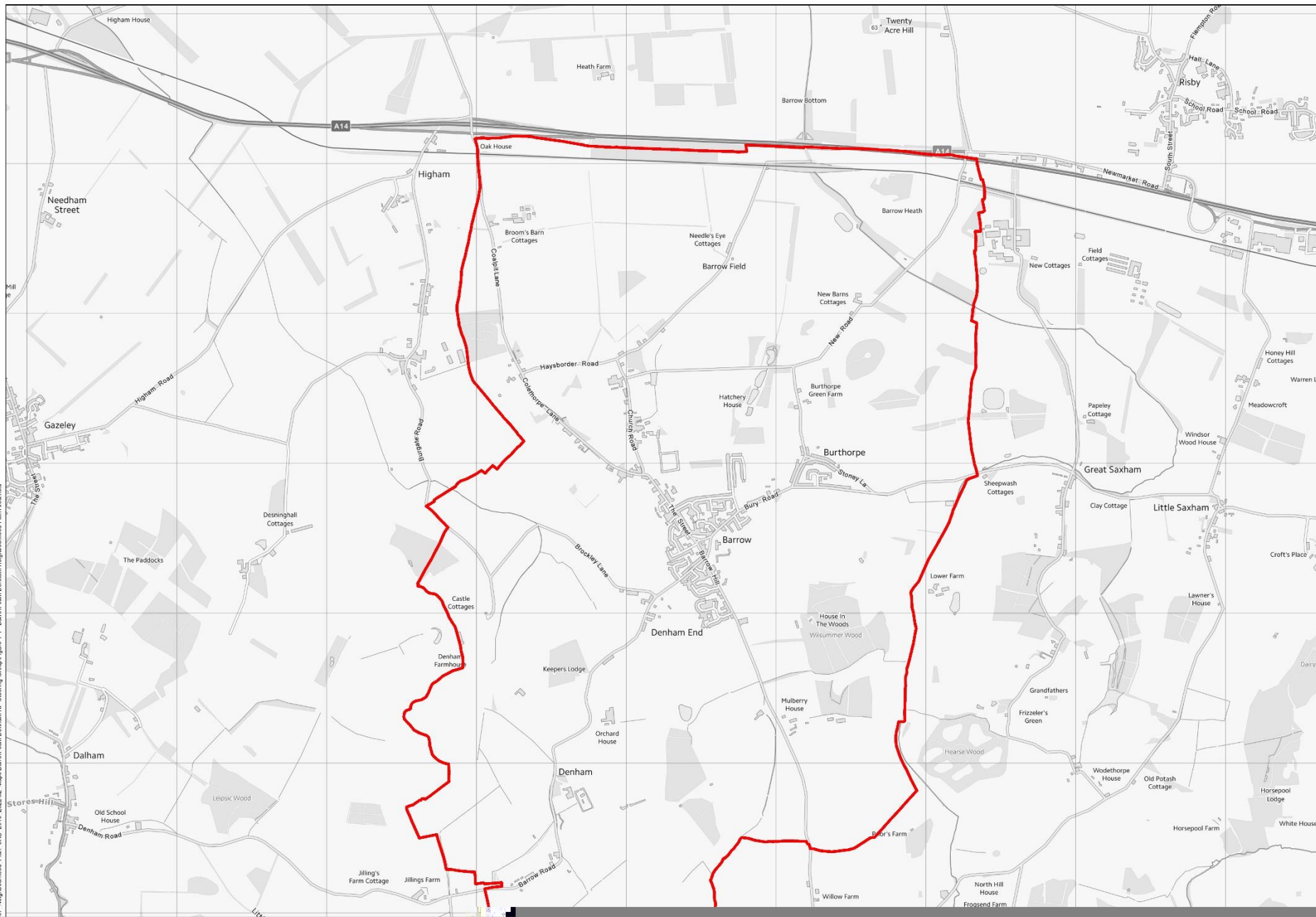
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LEGEND

Barrow cum Denham Neighbourhood Plan Area

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Purpose of Issue

FINAL

Client

BARROW CUM DENHAM NEIGHBOURHOOD PLAN STEERING GROUP

Project Title

STRATEGIC ENVIRONMENTAL ASSESSMENT FOR THE BARROW CUM DENHAM NEIGHBOURHOOD PLAN

Drawing Title

BARROW CUM DENHAM NEIGHBOURHOOD PLAN AREA

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1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment in support of Barrow cum Denham's emerging Neighbourhood Plan.
- 1.2 The Barrow cum Denham Neighbourhood Plan 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 St Edmundsbury's Vision 2031, specifically the Bury St Edmunds Vision 2031 (adopted in 2014). Due regard is also given to the emerging West Suffolk Local Plan Review.
- 1.3 It is currently anticipated that the Neighbourhood Plan will be submitted to West Suffolk Council in 2021. Key information relating to the Barrow cum Denham Neighbourhood Plan is presented in **Table 1.1**.

Table 1.1: Key facts relating to the Barrow cum Denham Neighbourhood Plan

Name of Responsible Authority	Barrow cum Denham Parish Council
Title of Plan	Barrow cum Denham Neighbourhood Plan
Subject	Neighbourhood planning
Purpose	<p>The Barrow cum Denham Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with St Edmundsbury's Vision 2031, with due regard given to the emerging West Suffolk Local Plan Review.</p> <p>The Barrow cum Denham Neighbourhood Plan will be used to guide and shape development within the Neighbourhood Plan area.</p>
Timescale	To 2040
Area covered by the plan	The Barrow cum Denham Neighbourhood Plan area covers the parish of Barrow cum Denham in West Suffolk (Figure 1.1).
Summary of content	The Barrow cum Denham Neighbourhood Plan will set out a vision, strategy and range of policies for the Neighbourhood Plan area.
Plan contact point	<p>Mark Howard, Barrow cum Denham Parish Council</p> <p>Email address: mark.howard275@gmail.com</p>

Relationship of the Barrow cum Denham Neighbourhood Plan with the West Suffolk Local Plan

- 1.4 In April 2019, Forest Heath District Council (FHDC) and St Edmundsbury Borough Council (SEBC) merged to form West Suffolk Council. The West Suffolk Local Plan (consisting of the former FHDC area and former SEBC area Local Plan documents) sets out the long term planning and land use policies within West Suffolk. The Local Plan includes documents previously referred to as the Local Development Framework (LDF). In this respect, the local plan for West Suffolk Council currently includes the following documents¹:
- Forest Heath Core Strategy (adopted 2010);
 - Forest Heath and St Edmundsbury Joint Development Management Policies Document (adopted 2015);
 - Site Allocations Local Plan (2019);
 - St Edmundsbury Core Strategy (adopted 2010); and
 - St Edmundsbury's Vision 2031; consisting of three Local Plans; Bury St Edmunds Vision 2031, Haverhill Vision 2031 and Rural Vision 2031 (adopted 2014).
- 1.5 Located within the SEBC area, the Barrow cum Denham Neighbourhood Plan is being prepared in the context of the St Edmundsbury's Vision 2031, specifically the Bury St Edmunds Vision 2031 (adopted in 2014).
- 1.6 Following the amalgamation of St Edmundsbury and Forest Heath Councils to West Suffolk Council, a Local Plan Review was deemed necessary. Once adopted, the West Suffolk Local Plan will establish a spatial strategy in relation to housing and employment growth for the period 2019 to 2040 (as well as dealing with other land uses such as retail and community) and allocate sites to deliver that strategy. In light of the current health measures in place in response to the COVID-19 pandemic, the Regulation 18 issues and options consultation which was planned for May 2020 has been postponed until further notice².
- 1.7 West Suffolk Council have suggested a housing target of 238 dwellings for the Neighbourhood Plan area. This is based on the settlement gaining a greater share of the housing burden based on its classification as a 'Key Service Centre' within the Settlement Hierarchy of the Local Plan. However, an independent and objective Housing Needs Assessment completed on behalf of Barrow cum Denham Parish Council suggested a requirement for 154 dwellings. In this respect (and with ongoing discussions with West Suffolk Council at present) it is anticipated that the Barrow cum Denham Neighbourhood Plan will seek to allocate between 154 and 238 dwellings during the plan period to meet local needs.
- 1.8 Neighbourhood plans will form part of the development plan for West Suffolk, alongside, but not as a replacement for the Local Plan. Neighbourhood plans are required to be in general conformity with the Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in West Suffolk, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.

SEA for the Barrow cum Denham Neighbourhood Plan

SEA Screening for the Neighbourhood Plan

- 1.9 The Barrow cum Denham Neighbourhood Plan has been screened in by West Suffolk Council as requiring a Strategic Environmental Assessment (SEA).

¹ West Suffolk Council (2020): 'West Suffolk Local Plan (consisting of the former Forest Heath and St Edmundsbury areas)', [online] available to access via: <https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/west-suffolk-local-plan-former-forest-heath-and-st-edmundsbury-areas.cfm> last accessed [19/06/20]

² West Suffolk Council (2020): 'West Suffolk Local Plan Review', [online] available to access via: <https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/west-suffolk-local-plan-review.cfm> last accessed [19/06/20]

- 1.10 A Neighbourhood Plan requires SEA where it is likely to have significant environmental effects. In this respect, the Barrow cum Denham Neighbourhood Plan has been screened in as requiring an SEA process for the following reasons:
- The Neighbourhood Plan will allocate new development in the parish. This includes potentially in environmentally sensitive locations, such as:
 - locations with sensitivity for the historic environment; and
 - locations with sensitivity for European and nationally designated sites for biodiversity, including the Breckland Special Protection Area (SPA) and Breckland Site of Special Scientific Interest (SSSI).
- 1.11 In light of this screening 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).

SEA explained

- 1.12 SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues.
- 1.13 The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts. Through this approach, the SEA for the Barrow cum Denham Neighbourhood Plan seeks to maximise the emerging plan's contribution to sustainable development.
- 1.14 SEA is undertaken to meet specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).
- 1.15 Two key procedural requirements of the SEA Regulations are that:
- i. 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; and
 - ii. A report (the 'Environmental Report') is published for consultation alongside the Draft Plan (i.e. the draft Barrow cum Denham Neighbourhood Plan) that presents outcomes from the environmental assessment (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.

This Scoping Report

- 1.16 This 'Scoping Report' is concerned with item 'i' above. It presents a suggested scope for the SEA so that the designated authorities (Historic England, Natural England and the Environment Agency) can provide timely comment.

SEA 'Scoping' explained

- 1.17 Developing the draft scope for the SEA as presented in this report has involved the following steps:
- i. Defining the broader context for the Barrow cum Denham Neighbourhood Plan and associated SEA (i.e. EU, UK Government and local policy and commitments), to summarise the regulatory and legislative landscape;
 - ii. Establishing the baseline for the SEA, (i.e. the current and future situation in the area in the absence of the Barrow cum Denham Neighbourhood Plan, in order to help identify the plan's likely significant effects;
 - iii. Identifying particular problems or opportunities ('issues') that should be a particular focus of the SEA; and
 - iv. Developing a SEA Framework comprising objectives and appraisal questions on the basis of these issues which can then be used to appraise the draft plan.

Structure of this Report

Key Sustainability Issues

1.18 The outcomes of the scoping elements introduced through steps i-iv above have been presented under a series of key environmental themes, as follows:

- Air Quality
- Biodiversity and Geodiversity
- Climatic Factors (including flood risk)
- Landscape
- Historic Environment
- Land, Soil and Water Resources
- Population and Community
- Health and Wellbeing
- Transportation

1.19 The selected environmental themes incorporate the 'SEA topics' suggested by Annex I (f) of the SEA Directive³. These were refined to reflect a broad understanding of the anticipated scope of plan effects. It is intended that presenting the scoping information under these themes will help enable the reader to easily locate the information of greatest interest to them. Once agreed (i.e. subsequent to consultation on this Scoping Report), the suggested scope presented under these nine themes will provide a methodological 'framework' for the environmental assessment of the draft plan and reasonable alternatives.

1.20 The discussion of the scoping information for each theme is presented in Sections 2 to 10.

SEA Framework to assess policy proposals

1.21 The SEA Framework provides a way in which environmental effects can be defined and subsequently analysed based on standard 'tests'. Each proposal within the emerging Barrow cum Denham Neighbourhood Plan will be assessed consistently using the framework.

1.22 The SEA objectives and appraisal questions proposed for the Barrow cum Denham Neighbourhood Plan SEA are presented under each of the themes in Sections 2 to 10.

³ The SEA Directive is 'of a procedural nature' (para 9 of the Directive preamble) and does not set out to prescribe particular issues that should and should not be a focus, beyond requiring a focus on 'the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors' [our emphasis]

2. Air Quality

Focus of Theme

- Air pollution sources
- Air quality hotspots
- Air quality management

Policy Context

2.1 Key messages from the National Planning Policy Framework (NPPF)⁴ include:

- *'Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.'*
- *'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.'*
- *New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.*

2.2 The Air Quality Standards Regulations 2010 transpose into UK law the Ambient Air Quality Directive (2008/50/EC) which sets legally binding limits for outdoor concentrations of major air pollutants which impact public health.

2.3 The government published the 'UK plan for tackling roadside nitrogen dioxide concentrations' in July 2017.⁵ This is the air quality plan for bringing nitrogen dioxide within statutory limits in the shortest possible time. The plan identifies that "the link between improving air quality and reducing carbon emissions is particularly important" and that consequently the UK government is determined to be at the forefront of vehicle innovation by making motoring cleaner.

2.4 Published in January 2018 by the UK Government, 'A Green Future: Our 25 Year Plan to Improve the Environment'⁶ sets out a number of goals and policies in order to help the natural world regain and retain good health. In this context, Goal 1 'Clean Air' and the policies contained within 'Chapter 4: Increasing resource efficiency and reducing pollution and waste' within the 25-year plan directly relate to the air quality SEA theme.

2.5 The Clean Air Strategy 2019 identifies how government will tackle all sources of air pollution and is aimed at complementing the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan. The strategy proposes new goals to cut public exposure to particulate matter pollution and sets out the comprehensive action that is required from across all parts of government and society to meet these goals. The proposed measures include new legislation

⁴ HM GOV (2018): 'Revised National Planning Policy Framework', [online] available to access via: <https://www.gov.uk/government/collections/revised-national-planning-policy-framework> last accessed [18/03/20]

⁵ DEFRA (2017) 'UK plan for tackling nitrogen dioxide concentrations' [online], available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-plan-overview.pdf

⁶ HM GOV (2018): 'A Green Future: Our 25 Year Plan to Improve the Environment', [online] available to access via: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf last accessed [18/03/20]

and new local powers to take action in areas with an air pollution problem, including through the creation of 'Clean Air Zones'.

2.6 At the local level the Core Strategy (adopted 2010)⁷ for the St Edmundsbury area outlines the framework for managing expected growth within the borough, setting out specific policies to tackle potential challenges within the next two decades. The following policies in the Vision directly relate to the Air Quality theme:

- Policy CS2 Sustainable Development

2.7 Additionally, the Bury St Edmunds Vision 2031⁸ outlines a framework for managing the expected growth in the town over the next two decades. The Vision contains thematic aspirations and actions including town planning policies, one of which directly corresponds to the Air Quality theme:

- Aspiration 20: Issues of Deprivation are Considered and Dealt with Appropriately.

Baseline Summary

Summary of Current Baseline

2.8 Local Planning Authorities are required to publish annual Air Quality Annual Status Reports (ASRs) to discharge their monitoring obligations under Part IV of the Environment Act (1995). Part IV of the Environment Act 1995 and Part II of the Environment (Northern Ireland) Order 2002 requires local authorities in the UK to review air quality in their area and designate Air Quality Management Areas (AQMAs) if improvements are necessary. Where an AQMA is designated, an Air Quality Action Plan (AQAP) must then be put in place.

2.9 Across West Suffolk, air quality is considered generally good and continues to show long-term improvement at monitored locations throughout the district. As of May 2020, there are no AQMAs declared within the Neighbourhood Plan area. There are currently three declared AQMAs within West Suffolk, with their distance from Barrow-cum-Denham shown below.

- **Sicklesmere Road AQMA** - 11.5km to the east;
- **Great Barton AQMA** - 12.4km to the north east; and
- **Newmarket AQMA** - 12.1km to the west.

2.10 The most recently available air quality data for West Suffolk District is presented in the 2018 Annual Status Report (ASR)⁹. The ASR identifies that the main source of pollution in the area is from road traffic. Nitrogen dioxide (NO₂) from vehicle emissions is the primary pollutant identified and monitoring for this pollutant is carried out across the district, focussing on busy roads in market towns. Other pollutants, such as particulates, sulphur dioxide and carbon monoxide, have been previously assessed and confirmed as not being at risk of exceeding respective air quality objectives.

2.11 The A14 borders the northernmost boundary of the Neighbourhood Plan area and is likely to be a 'pollution hotspot' due to traffic passing west towards the town of Bury St Edmunds. However, no formal assessment of air quality has currently been undertaken at this location.

Summary of Future Baseline

2.12 New housing and employment provision taken forward within the parish and the wider area, including through the West Suffolk Local Plan, has the potential for adverse effects on air quality through increasing traffic flows and associated levels of pollutants such as NO₂.

⁷ St Edmundsbury Borough Council (2010): Core Strategy [online] available at: https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/Core-Strategy-December-2010.pdf

⁸ St Edmundsbury Borough Council (2014): Bury St Edmunds Vision 2031 [online] available at: https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/BSE-vision-2015v6-hi-res-compressed.pdf

⁹ West Suffolk Council (2018) Air Quality Annual Status Report [online] https://www.westsuffolk.gov.uk/environment/upload/West-Suffolk-ASR_2018_final.pdf

2.13 However, this is unlikely to lead to exceedances of air quality objectives in the Neighbourhood Plan area given the existing low baseline.

Key Sustainability Issues

- There are no AQMAs within the Neighbourhood Plan area. However, the ASR notes that the road network within the wider district is vulnerable to air pollution issues associated with congestion.
- Emissions associated with road transport (primarily NO₂) are the main pollutant of concern.
- Due to the absence of any significant air quality issues within the Neighbourhood Plan area itself, **the air quality theme has been scoped out for the purposes of the SEA process.**

3. Biodiversity and Geodiversity

Focus of Theme

- Nature conservation designations
- Geological sites
- Habitats
- Species

Policy Context

3.1 At the European level, the EU Biodiversity Strategy¹⁰ was adopted in May 2011 in order to deliver an established new Europe-wide target to *'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'*.

3.2 Key messages from the National Planning Policy Framework (NPPF) include:

- One of the three overarching objectives of the NPPF is an environmental objective to *'contribute to protecting and enhancing our natural, built and historic environment' including by 'helping to improve biodiversity.'*
- *'Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value [...], take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.'*
- *'Planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with the statutory status or identified quality in the development plan); and minimising impacts on and providing net gains for biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures.'*
- *'To protect and enhance biodiversity and geodiversity, plans should:*
 - a) *Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
 - b) *Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.'*

3.3 The Natural Environment White Paper (NEWP)¹¹ sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was in part a response to the UK's failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. It includes commitments to:

¹⁰ European Commission (2011): 'Our life insurance, our natural capital: an EU biodiversity strategy to 2020', [online] available to access via: <http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP_resolution_april2012.pdf> last accessed [18/03/20]

¹¹ Defra (2012): 'The Natural Choice: securing the value of nature (Natural Environment White Paper)', [online] available to access via: <<http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>> last accessed [18/03/20]

- Halt biodiversity loss support functioning ecosystems and establish coherent ecological networks by 2020;
 - Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;
 - Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
 - Address barriers to using green infrastructure to promote sustainable growth.
- 3.4 The UK Biodiversity Action Plan¹² (BAP) identifies priority species and habitats requiring conservation action. Although the UK BAP has been superseded, BAP priority species and habitats have been used to draw up statutory lists of priority species and habitats in England.
- 3.5 Reflecting the commitments within the Natural Environment White Paper and the EU Biodiversity Strategy, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' aims to *'halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'*¹³.
- 3.6 The recently published 25 Year Environment Plan¹⁴ sets out the Government's environmental plan of action over the next quarter century, in the context of Brexit. The Plan aims to tackle the growing problems of waste and soil degradation, improving social justice through tackling pollution and promoting the mental and physical health benefits of the natural world. It also sets out how the Government will address the effects of climate change. These aims are supported by a range of policies which are focused on the following six key areas:
- Using and managing land sustainably;
 - Recovering nature and enhancing the beauty of landscapes;
 - Connecting people with the environment to improve health and wellbeing;
 - Increasing resource efficiency, and reducing pollution and waste;
 - Securing clean, productive and biologically diverse seas and oceans; and
 - Protecting and improving the global environment.
- 3.7 In this context, Goal 3 'Thriving plants and wildlife' and the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Chapter 5 'Securing clean, productive and biologically diverse seas and oceans' directly relate to the biodiversity and geodiversity SEA theme.
- 3.8 The Suffolk Strategic Partnership highlight the unique biodiversity features of the County and acknowledges the importance of maintaining and enhancing these "special and distinctive" elements in their Community Strategy¹⁵. It recognises some of these characteristics as essentially irreplaceable and acknowledges the climate related challenges that are likely to ensue over the coming 20 years.
- 3.9 The Suffolk Planning Biodiversity Action Plan¹⁶ (2012) developed by the Suffolk Biodiversity Planning Group aims to help Local Authority and other planning departments to meet their legal obligations towards biodiversity. The action plan sets out 5 broad targets:
- Ensure development avoids adverse impacts on biodiversity;

¹² JNCC (2007) UK BAP priority species [online] <http://archive.jncc.gov.uk/page-5717>

¹³ DEFRA (2011): 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services', [online] Available to access via: <https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services> > last accessed [18/03/20]

¹⁴ HM GOV (2018): 'A Green Future: Our 25 Year Plan to Improve the Environment', [online] available to access via: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf last accessed [18/03/20]

¹⁵ Suffolk Strategic Partnership (2008) Transforming Suffolk – Suffolk's Community Strategy 2008 to 2028 [online] available at: https://www.ipswich.gov.uk/sites/default/files/scd07_-_suffolk_community_strategy.pdf

¹⁶ Suffolk Biodiversity Partnership (2012) Suffolk Local Biodiversity Action Plan [online] available at:

https://www.suffolkbis.org.uk/sites/default/files/biodiversity/priorityspecieshabitats/actionplans/Planning_BAP_Final%2018%20May%202012.pdf

- Where avoidance is not possible, mitigate residual impacts of developments;
 - Where mitigation is not possible, compensate for losses incurred during development;
 - Enhance developments for biodiversity; and
 - Ensure biodiversity is taken into consideration during, and after, the construction phase of development.
- 3.10 The Suffolk Nature Strategy¹⁷ (2015) describes the challenges and opportunities for Suffolk's natural environment, articulating key natural environment priorities, recommendations and actions.
- 3.11 At the local level, the following policies within the Core Strategy (adopted 2010) for the St Edmundsbury area directly relate to the Biodiversity and Geodiversity theme:
- Policy CS2: Sustainable Development; and
 - Policy CS13: Rural Areas.
- 3.12 Additionally, the following aspiration within the Bury St Edmunds Vision 2031 directly corresponds to the Biodiversity and Geodiversity theme: Aspiration 26 'The Historic and Natural Environment is Managed, Protected, Maintained and Enhanced'.

Baseline Summary

Summary of Current Baseline

European and Nationally designated sites

- 3.13 There are no European or nationally designated sites directly within the Neighbourhood Plan area. In the wider context, the Breckland Special Protection Area (SPA) and Special Area of Conservation (SAC) are located to the north of the Neighbourhood Plan area. These sites contain habitats and species listed in the annexes of both the European Habitats Directive (92/43/EEC) and the European Birds Directive (79/409/EEC).
- 3.14 The Breckland SPA and SAC cover a vast stretch of land at just under 40,000ha. The sites are characterised by an extensive area of grass heath (and some heather heath), large arable fields, and the largest coniferous forest in lowland England. Together, these support over 2000 priority species, many of which are confined to the area, or have their core UK distribution there. Both sites are underpinned by several Sites of Special Scientific Interest (SSSIs). The Breckland SPA is designated for noted populations of the bird species; Stone curlew (*Burhinus oedichnemus*), Nightjar (*Caprimulgus europaeus*) and Woodlark (*Lullula arborea*).¹⁸ Comparatively, the qualifying habitats and species of the Breckland SAC are summarised from the Joint Nature Conservation Committee (JNCC) as follows¹⁹:
- Inland dunes with open grassland with grey-hair grass (*Corynephorus sp.*) and common bent grass (*Agrostis*) of inland dunes;
 - Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation: Naturally nutrient-rich lakes or lochs which are often dominated by pondweed;
 - European dry heaths;
 - Semi-natural dry grasslands and scrubland facies: Dry grasslands (*Festuco-Brometalia*) and scrublands on chalk or limestone;
 - Alluvial forests with Black Alder (*Alnus glutinosa*) and European Ash (*Fraxinus excelsior*);
 - Alder woodland on floodplains (*Alno-Padion*, *Alnion incanae*, *Salicion albae*); and
 - Great crested newt (*Triturus cristatus*).

¹⁷ Suffolk County Council (2015) Suffolk's Nature Strategy [online] available at: <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/suffolks-countryside-and-wildlife/Suffolks-Nature-Strategy-2015.pdf>

¹⁸ Natural England – Designated Sites View [online] available at: <https://designatedsites.naturalengland.org.uk/>

¹⁹ JNCC (no date): 'Breckland SAC', [online] available to access via: <https://sac.jncc.gov.uk/site/UK0019865>

- 3.15 Alongside the impacts of development, the Site Improvement Plan (SIP) for Breckland SPA and SAC²⁰ identifies the following threats to the sites:
- Forestry and woodland management;
 - Changes in species distributions;
 - Stone curlew monitoring and intervention;
 - Air pollution; impact of atmospheric nitrogen deposition;
 - Public access/ disturbance;
 - Climate change;
 - Habitat fragmentation;
 - Inappropriate weed control; and
 - Inappropriate pest control.
- 3.16 Likewise, the Breckland Farmland SSSI is located directly to the north of Neighbourhood Plan area and shares an overlapping designation with the Breckland SPA and SAC. Covering an area of approximately 13,000 ha and notified in November 2000, the citation statement confirms that the SSSI was primarily notified for supporting populations of Stone Curlew²¹. Based on the most recently completed condition assessments undertaken between 2008 and 2009, 100% of the Breckland Farmland SSSI was classified as having a 'favourable' condition.
- 3.17 In the wider context, the following SSSIs are located within a 5km radius from the Neighbourhood Plan area and all share an overlapping designation with either the Breckland SPA or Breckland SAC: Black Ditches, Cavenham SSSI; Lackford Lakes SSSI; West Stow Heath SSSI; Red Lodge Heath SSSI; and Cherry Hill and The Gallops, Barton Mills SSSI.
- 3.18 SSSI Impact Risk Zones (IRZ) are a GIS tool/dataset which maps zones around each SSSI according to the sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location, including residential, rural-residential and rural non-residential. Natural England is a statutory consultee on development proposals that might impact on SSSIs. In this respect, the whole of the Neighbourhood Plan area overlaps with either one or multiple SSSI Impact Risk Zones for the types of development likely to be taken forward during the plan period (i.e. residential, rural-residential or rural non-residential development types).

Locally designated sites

- 3.19 At the local level, the Neighbourhood Planning Steering Group confirm that there are three Roadside Nature Reserves located in Denham. One of which is located at Brockley Lane. The remaining two are located near to the Denham Estate (between Denham and Dalham).
- 3.20 There are a variety of Biodiversity Action Plan (BAP) Priority Habitats located within or within proximity to the Neighbourhood Plan area, including areas of deciduous woodland, good quality semi-improved grassland, and traditional orchard.
- 3.21 Some of the areas of deciduous woodland BAP Priority Habitat are also identified as areas of ancient semi-natural woodland, including Wilsummer Wood (located to the south of Barrow village) and Hockerill Wood (located to the north west of Denham Estate). Wilsummer Wood is also designated as a County Wildlife Site.
- 3.22 **Figure 3.1** (overleaf) shows the designated wildlife sites, SSSI IRZs, and BAP priority habitats located within and within the immediate surroundings of the Neighbourhood Plan area.

²⁰ Natural England (2015) Site Improvement Plan: Breckland [online] available at: <http://publications.naturalengland.org.uk/publication/5075188492271616>

²¹ Natural England (no date): 'Breckland Farmland SSSI', [online] available to access via: <https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s2000442> last accessed [18/06/20]

Summary of Future Baseline

- 3.23 Habitats and species will potentially face increasing pressures from future development within the Neighbourhood Plan area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change. This has the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.
- 3.24 The Neighbourhood Plan presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species and designated sites at an early stage of planning for future growth. To maintain and improve the condition of biodiversity in the future, it will be important to not only protect and enhance important habitats but the connections between them. It will be crucial to effectively coordinate the delivery of housing, employment and infrastructure to ensure that opportunities to improve green infrastructure and ecological corridors are maximised within the Neighbourhood Plan area and in the surrounding areas.

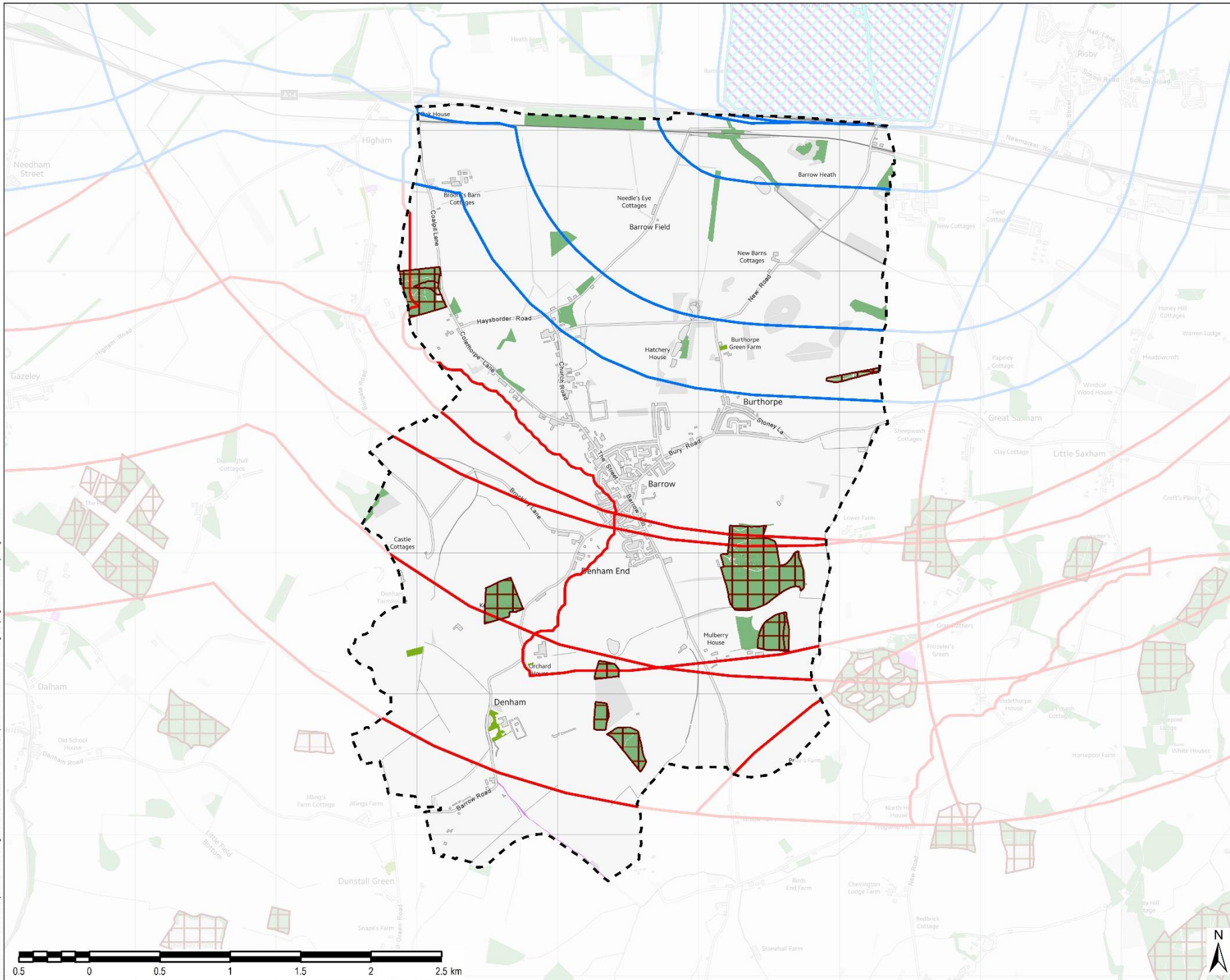
Key Sustainability Issues

- The nearest European designated sites are located to the north of the Neighbourhood Plan area, namely: Breckland SPA and SAC;
- There are six SSSIs within 5km of the Neighbourhood Plan area: Breckland Farmland SSSI; Black Ditches, Cavenham SSSI; Lackford Lakes SSSI; West Stow Heath SSSI; Red Lodge Heath SSSI; and Cherry Hill and The Gallops, Barton Mills SSSI.
- The whole of the Neighbourhood Plan area overlaps with either one or multiple SSSI Impact Risk Zones for the types of development likely to be taken forward (i.e. residential, rural-residential or rural non-residential development types).
- There are three Roadside Nature Reserves located in Denham.
- There are a variety of Biodiversity Action Plan (BAP) Priority Habitats located within or within proximity to the Neighbourhood Plan area, including areas of deciduous woodland, good quality semi-improved grassland, and traditional orchard.
- Some of the areas of deciduous woodland BAP Priority Habitat are identified as areas of ancient semi-natural woodland, including Wilsummer Wood and Hockerill Wood.
- Wilsummer Wood is also designated as a County Wildlife Site.

What are the SEA objectives and appraisal questions for the Biodiversity and Geodiversity SEA theme?

SEA objective Assessment Questions

Protect and enhance all biodiversity and geodiversity	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support the integrity of the European designated sites located within proximity to the Neighbourhood Plan area? • Support the status of the nationally and locally designated sites within and within proximity to the Neighbourhood Plan area? • Protect and enhance priority habitats and species, including those listed in the annexes of the European Habitats Directive and the European Birds Directive? • Achieve a net gain in biodiversity? • Support enhancements to multifunctional green infrastructure networks? • Support access to, interpretation and understanding of biodiversity and geodiversity?
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LEGEND

- Barrow cum Denham Neighbourhood Plan Area
- Ancient Woodland
- Special Protection Area (SPA)
- Site of Special Scientific Interest (SSSI)
- SSSI Impact Risk Zones - Residential**
- Any residential developments with a total net gain in residential units.
- Residential development of 100 units or more.
- Biodiversity Action Plan Priority Habitats**
- Deciduous Woodland
- Good Quality Semi-improved Grassland
- Traditional Orchard

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Purpose of Issue **FINAL**

Client **BARROW CUM DENHAM NEIGHBOURHOOD PLAN STEERING GROUP**

Project Title **STRATEGIC ENVIRONMENTAL ASSESSMENT FOR THE BARROW CUM DENHAM NEIGHBOURHOOD PLAN**

Drawing Title **BIODIVERSITY DESIGNATIONS**

Drawn CN	Checked JW	Approved RP	Date 04/06/2020
AECOM Internal Project No. 60571087		Scale @ A4 1:35,000	

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Drawing Number **FIGURE 3.1** Rev **01**

4. Climate Change

Focus of Theme

- Contribution to climate change
- Effects of climate change
- Climate change adaption
- Flood risk

Policy Context

4.1 The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It requires the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report aiming to understand the current and future climate risks and opportunities. The evidence report contains six priority risk areas requiring additional action in the next five years, see below²² :

- Flooding and coastal change risks to communities, businesses and infrastructure;
- Risks to health, well-being and productivity from high temperatures;
- Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
- Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
- Risks to domestic and international food production and trade; and
- New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals.

4.2 The UK Climate Change Act²³ was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement. The Climate Change Act 2008 (2050 Target Amendment) Order 2019 means that there is now in place a legally binding target of net zero by 2050. The Climate Change Act includes the following:

- Commits the UK government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050. This includes reducing emissions from the devolved administrations (Scotland, Wales and Northern Ireland), which currently account for about 20% of the UK's emissions. The 100% target was based on advice from the CCC's 2019 report, 'Net Zero – The UK's contribution to stopping global warming' and introduced into law through the Climate Change Act 2008 (2050 Target Amendment) Order 2019.
- The Act requires the Government to set legally binding 'carbon budgets'. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The carbon budgets are designed to reflect the cost-effective path to achieving the UK's long-term objectives. The first five carbon budgets have been put into legislation and run up to 2032.
- The Committee on Climate Change was set up to advise the Government on emissions targets, and report to Parliament on progress made in reducing greenhouse gas emissions.
- The Act requires the Government to assess the risks and opportunities from climate change for the UK, and to prepare for them. The Committee on Climate Change's Adaptation Sub-

²² GOV.UK: 'UK Climate Change Risk Assessment Report January 2017', [online] available to access via: <<https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017>> last accessed [18/03/20]

²³ GOV.UK (2008): 'Climate Change Act 2008', [online] accessible via <<http://www.legislation.gov.uk/ukpga/2008/27/contents>> last accessed [19/09/18]

Committee advises on these climate change risks and assesses progress towards tackling them. The associated National Adaptation Programme requires the Government to assess the risks to the UK from climate change, prepare a strategy to address them, and encourage key organisations to do the same.

4.3 Key messages from the National Planning Policy Framework (NPPF) include:

- One of the three overarching objectives of the NPPF is an environmental objective to *'contribute to protecting and enhancing our natural, built and historic environment' including by 'mitigating and adapting to climate change' and 'moving to a low carbon economy.'* 'The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.'
- *'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.'*
- *'Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.'*
- Direct development away from areas at highest risk of flooding (whether existing or future). *'Where development is necessary, it should be made safe for its lifetime without increasing flood risk elsewhere.'*

4.4 The Clean Air Strategy released in 2019 sets out the Government plans for dealing with all sources of air pollution. The strategy sets out proposals in detail and indicates how devolved administrations intend to make their share of emissions reductions, and complements the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan.

4.5 In May 2019, the UK Parliament declared a climate emergency, with a view to explicitly acknowledging that human activities are significantly affecting the climate, and actions to mitigate and adapt to climate change should be paramount. This declaration has been mirrored by several local planning authorities across the country.

4.6 The Flood and Water Management Act²⁴ highlights that alternatives to traditional engineering approaches to flood risk management include:

- Incorporating greater resilience measures into the design of new buildings, and retro-fitting properties at risk (including historic buildings);
- Utilising the environment in order to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water;
- Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere;
- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
- Creating sustainable drainage systems (SuDS).²⁵

²⁴ Flood and Water Management Act (2010) [online] available to access via:
<<http://www.legislation.gov.uk/ukpga/2010/29/contents>> last accessed [18/03/20]

²⁵ N.B. The provision of Schedule 3 to the Flood and Water Management Act 2010 came into force on the 1st of October 2012 and makes it mandatory for any development in England or Wales to incorporate SuDs.

- 4.7 Further guidance is provided in the document 'Planning for SuDS'.²⁶ This report calls for greater recognition of the multiple benefits that water management can present. It suggests that successful SuDS are capable of 'contributing to local quality of life and green infrastructure'.
- 4.8 West Suffolk Council has declared a Climate Emergency status on the 19th September 2019 and at the same time, are committed to making the authority net-zero carbon by 2030. Further context is provided by the recent commitment by environmental law firm Client Earth to request that all local authorities with emerging Local Plans to "*explain how they will set evidence-based carbon reduction targets and ensure these targets are then central to their new planning policy.*"²⁷
- 4.9 The West Suffolk Sustainability Strategy 2013-2018²⁸ set out to raise awareness of climate change and the economic opportunities therein through increasing the resilience of residents and businesses in the district. Effects of climate change on the living environment in areas such as indoor air pollution, overheating, and flood damage are highlighted as key concerns.
- 4.10 The West Suffolk Growth Investment Strategy Energy Framework²⁹ (2018) sets out the case for and identifies the opportunities for positive impacts on the local energy system, supporting planned interventions and the future prosperity of West Suffolk.
- 4.11 A Level 1 Strategic Flood Risk Assessment (SFRA) and Outline Water Cycle Study³⁰ was completed for the former Forest Heath District Council and St Edmundsbury Borough Council in 2009. In the Forest Heath area this led to a Level 2 SFRA³¹ and Water Cycle Study Stage 2³² (Full Strategy) in 2011, as well as a further Water Cycle S

Baseline Summary

Summary of Current Baseline

Contribution to climate change

- 4.14 CO₂ emissions from the built environment are monitored and recorded at Local Authority level. **Figure 4.1** (below) indicates that CO₂ emissions for Suffolk have declined over the period of 2005- 2017, broadly in line with regional and national statistics. However, emissions are marginally higher in Suffolk (5.5 kt CO₂) than for the East of England (5.0 kt CO₂) and England as a whole (5.1 kt CO₂), and have been for the past decade. The largest contributing sector for total emissions in 2017 was the transport sector (48.9%), specifically from A roads (74.2%).

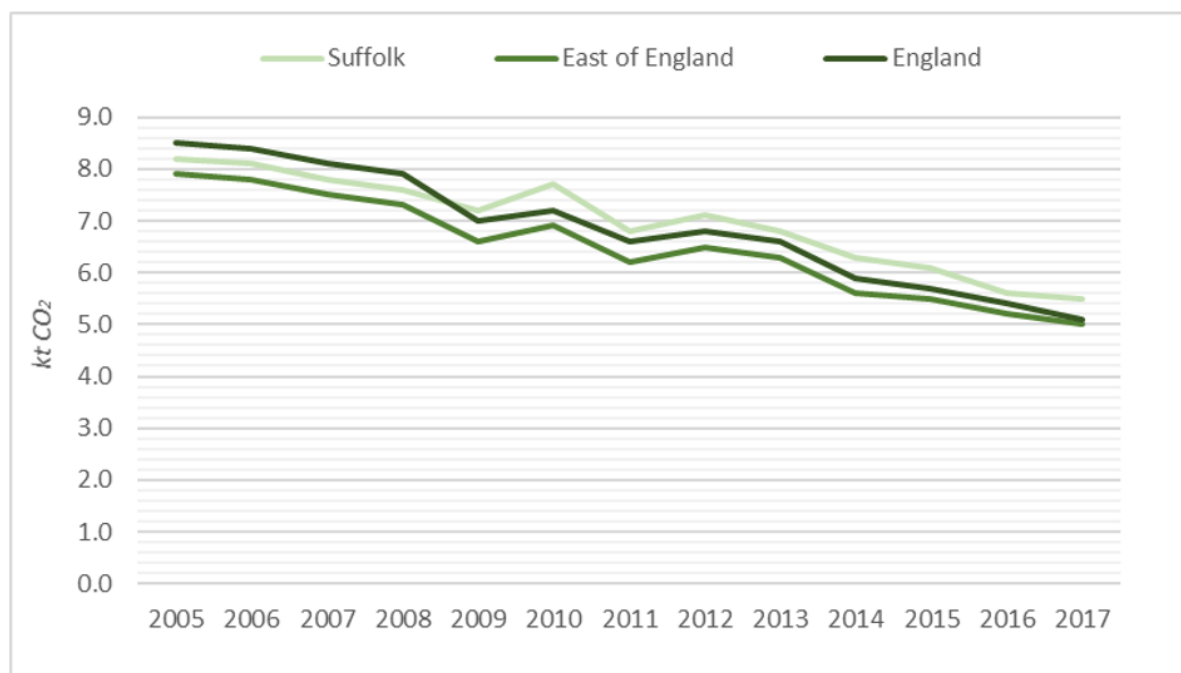


Figure 4.1 Total per capita CO₂ emissions estimates within the scope of influence of counties 2005-2017 (kt CO₂)³⁴

Potential effects of climate change

- 4.15 The outcome of research on the probable effects of climate change in the UK was released in 2018 by the UK Climate Projections (UKCP18)³⁵. UKCP18 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.
- 4.16 As highlighted by the research, the effects of climate change (under medium emissions scenarios 50th percentile) for the East of England during the period 2040-2059 compared to the period 1981-2000 are likely to be as follows:
- An increase in winter mean temperature of 2.2 °C and an increase in summer mean temperature of 2.8 °C;
 - A change in winter mean precipitation greater than +10% and summer mean precipitation greater than -10%.

³⁴ Department for Business, Energy and Industrial Strategy (2019) UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2017 [online], available from: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2017> [accessed 28/05/20].

³⁵ Data released 26th November 2018 [online] available to access via: <https://www.metoffice.gov.uk/research/collaboration/ukcp> last accessed [18/03/20]

4.17 Resulting from these changes, a range of risks may exist for the Neighbourhood Plan area, including:

- Effects on water resources from climate change
- Reduction in availability of groundwater for extraction
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain
- Increased risk of flooding, including increased vulnerability to 1:100 year floods
- A need to increase the capacity of wastewater treatment plants and sewers
- A need to upgrade flood defences
- Soil erosion due to flash flooding
- Loss of species that are at the edge of their southerly distribution
- Spread of species at the northern edge of their distribution
- Increased demand for air-conditioning
- Increased drought and flood related problems such as soil shrinkages and subsidence
- Risk of road surfaces melting more frequently due to increased temperature
- Flooding of roads

4.18 West Suffolk Council declared a climate emergency in September 2019.³⁶

Flood risk

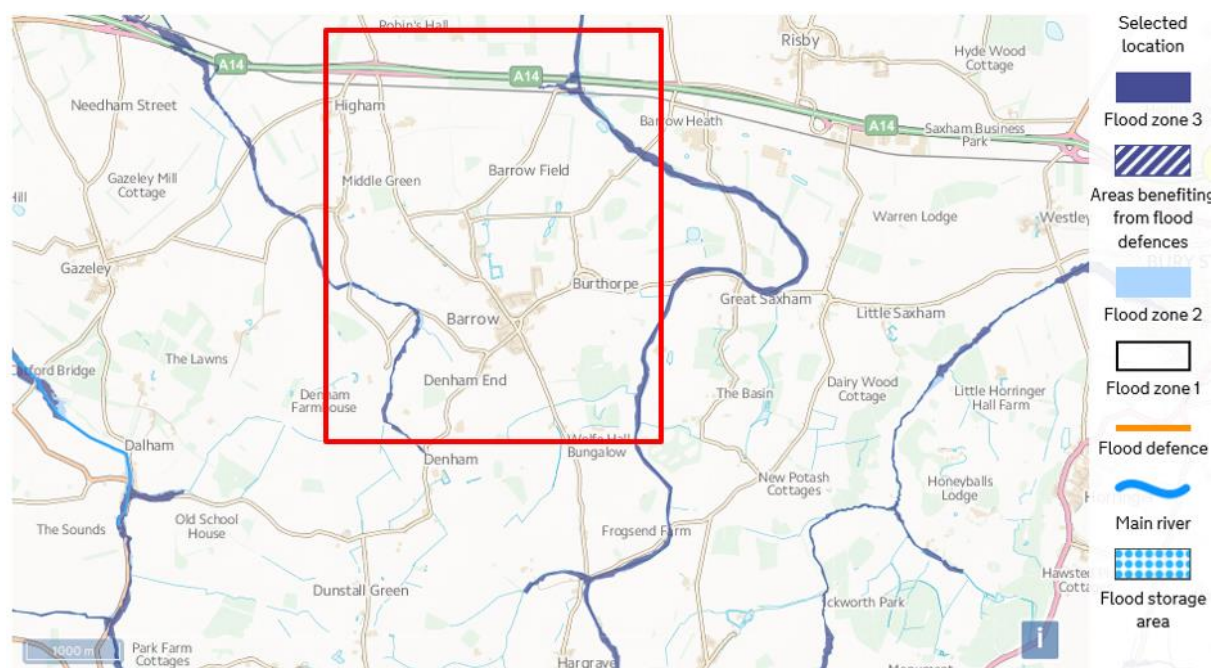


Figure 4.2: Fluvial flood risk within the Neighbourhood Plan area³⁷

4.19 **Figure 4.2** (above) illustrates fluvial flood risk within the Neighbourhood Plan area. Areas at highest risk (i.e. a 1 in 100 or greater annual probability of flooding) broadly align with the Cavenham Stream (a tributary of the River Lark) which is located to the north and east of the Neighbourhood Plan area).

³⁶ West Suffolk Council (2019) Minutes Thursday 19th September 6.30pm [online] available from: <https://democracy.westsuffolk.gov.uk/mgAi.aspx?ID=21352>

³⁷ GOV UK (2019): 'Flood Map for Planning', [online] available at: <https://flood-map-for-planning.service.gov.uk/> last accessed [18/03/20]

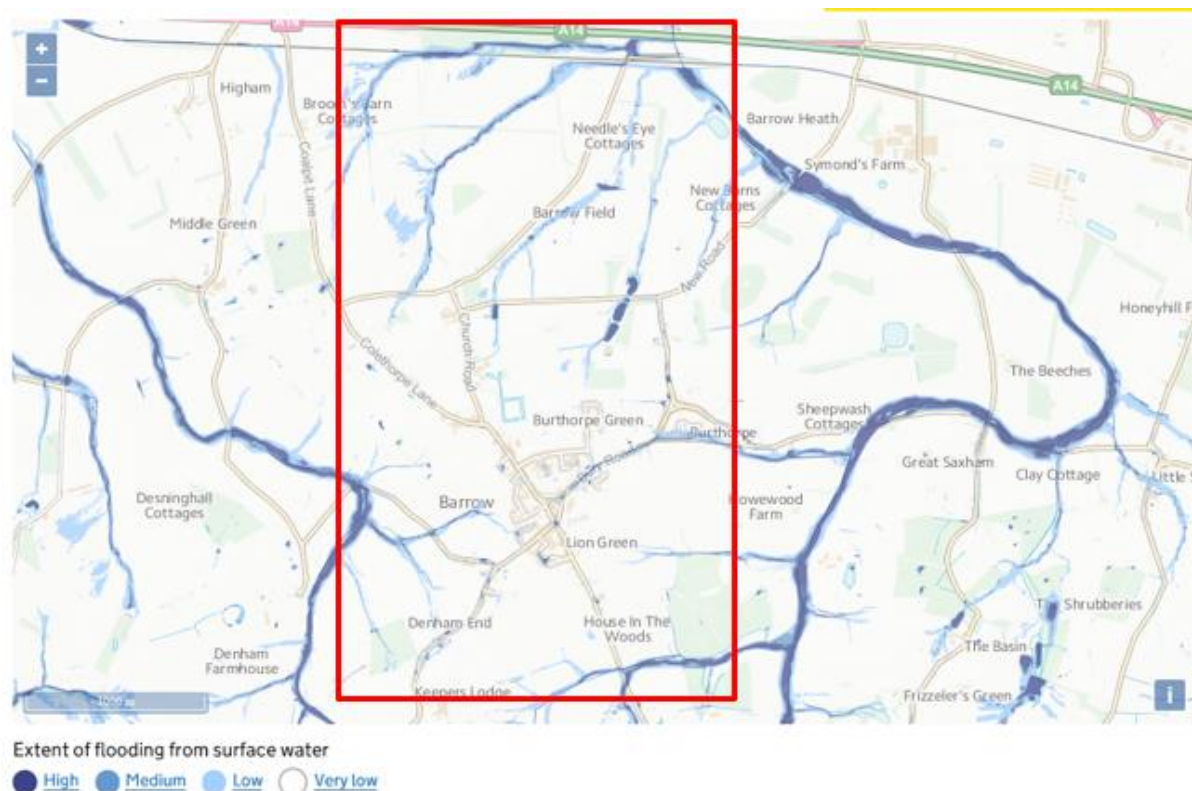


Figure 4.3: Surface water flood risk within the Neighbourhood Plan area³⁸

4.20 Surface water flood risk is prevalent in the Neighbourhood Plan area, with areas of medium-high risk within the settlement boundaries (shown in **Figure 4.3** above). The following areas are particularly susceptible: Bury Road, the sluice at New Road; and Denham End.

Summary of Future Baseline

- 4.21 Climate change has the potential to increase the occurrence of extreme weather events in the Neighbourhood Plan area. This is likely to increase the risks associated with climate change, with an increased need for resilience and adaptation. Specifically, new development areas have the potential to increase flood risk through factors such as changing surface and ground water flows, overloading existing inputs to the drainage and wastewater networks or increasing the number of residents exposed to areas of existing flood risk.
- 4.22 Widespread implementation of sustainable urban drainage systems (SuDS) could help reduce the risk from surface water runoff, though it will continue to be important that new development avoids introducing large new areas of non-permeable hardstanding wherever possible.
- 4.23 In terms of climate change contribution, per capita greenhouse gas emissions generated in the Neighbourhood Plan area may continue to decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies, including electric cars. However, increases in the built footprint of the Neighbourhood Plan area would contribute to increases in the absolute levels of greenhouse gas emissions.
- 4.24 West Suffolk's declaration of a climate emergency in 2019 will likely see greater focus on the role that plan-making can play in tackling harmful emissions.

³⁸ GOV UK (2017): 'Long term flood risk assessment for locations in England', [online] available to access via: <<https://flood-warning-information.service.gov.uk/long-term-flood-risk/>> last accessed [18/03/20]

Key Sustainability Issues

- Any increases in the built footprint of the Neighbourhood Plan area (associated with the delivery of new housing and employment land) has the potential to increase overall greenhouse gas emissions in the parish.
- The largest sector for CO₂ emissions in 2017 was the Transport sector, contributing 48.9% to the total emissions.
- West Suffolk Council has recently declared a climate emergency and has resolved to support local authorities (and, by extension, Neighbourhood groups) to help tackle climate change through plan-making where possible.
- The areas at highest risk of fluvial flooding (Flood Zone 3) are those surrounding the Cavenham Stream (a tributary of the River Lark) which is located to the north and east of the Neighbourhood Plan area.
- Surface water flood risk is prevalent in the Neighbourhood Plan area, with areas of medium-high risk within the settlement boundaries. The following areas are particularly susceptible: Bury Road, the sluice at New Road; and Denham End.
- The Neighbourhood Plan should seek to increase the resilience of the Neighbourhood Plan area to the effects of climate change by supporting and encouraging adaptation strategies.

What are the SEA objectives and appraisal questions for the Climate Change SEA theme?

SEA objective	Assessment Questions
Reduce the contribution to climate change made by activities within the Neighbourhood Plan area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Reduce the number of journeys made? • Reduce the need to travel? • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources? • Reduce energy consumption from non-renewable resources?
Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Ensure that inappropriate development does not take place in areas at higher risk of flooding, taking into account the likely future effects of climate change? • Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change? • Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)? • Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan area? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?

5. Landscape

Focus of Theme

- Nationally protected landscapes
- Landscape and villagescape character and quality
- Designated and non-designated sites and areas
- Visual amenity

Policy Context

- 5.1 The European Landscape Convention³⁹ of the Council of Europe promotes the protection, management and planning of the landscapes and organises international co-operation on landscape issues. The convention was adopted in October 2000 and is the first international treaty to be exclusively concerned with all dimensions of European landscapes.
- 5.2 Key messages from the National Planning Policy Framework (NPPF) include:
- *‘Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty [...]. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.’*
 - Strategic policies should set out an overall strategy making provision for *‘conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.’*
 - Planning policies and decisions should ensure that developments *‘are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).’*
 - *‘Planning policies and decisions should contribute to and enhance the natural and local environment by:*
 - protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils*
 - recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and*
 - remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.’*
- 5.3 The policies contained within Chapter 2 ‘Recovering nature and enhancing the beauty of landscapes’ and Goal 6 ‘Enhanced beauty, heritage and engagement with the natural environment’ of the Government’s ‘A Green Future: Our 25 Year Plan to Improve the Environment’ directly relates to the landscape SEA theme.
- 5.4 At the local level, the following policies within the Core Strategy (adopted 2010) for the St Edmundsbury area directly relate to the Landscape theme:
- Policy CS2: Sustainable Development;
 - Policy CS3: Design and Local Distinctiveness; and
 - Policy CS13: Rural Areas.

³⁹ Council of Europe (2000): ‘European Landscape Convention’, [online] available to access via: <https://www.coe.int/en/web/landscape> last accessed [18/03/20]

- 5.5 Additionally, the following aspiration within the Bury St Edmunds Vision 2031 directly corresponds to the Landscape theme: Aspiration 26 'The Historic and Natural Environment is Managed, Protected, Maintained and Enhanced'.

Baseline Summary

Summary of Current Baseline

Nationally protected landscapes

- 5.6 The Neighbourhood Plan area is not within or within proximity to a National Park, Area of Outstanding Natural Beauty (AONB) or any Green Belt land. The nearest nationally protected landscape, the Suffolk Coast and Heaths AONB, is located approximately 30km to the south east of the Neighbourhood Plan area (at its nearest point). Additionally, the Cambridge Green Belt is located approximately 20km to the west of the Neighbourhood Plan area.

National character areas

- 5.7 National Character Areas (NCAs) are landscape areas which share similar characteristics, following natural lines in the landscape rather than administrative boundaries. Developed by Natural England, NCA profiles describe the natural and cultural features that shape each of these landscapes, providing a broad context to their character. The Neighbourhood Plan area overlaps with two NCAs: The Brecks (northern section); South Suffolk and North Essex Clayland (central and southern section).
- 5.8 The Brecks NCA, also known as Breckland is identified for "an ages-old identity, a very particular land use history and a richly distinctive wildlife, which sets it apart from all surrounding landscapes."⁴⁰ The Brecks is among the warmest and driest parts of the UK which combined with its free-draining soils "has greatly influenced the landscape character and led to the development of dry heath and grassland communities". The area is a major producer of vegetables and cereals, with over two-thirds of the land under cultivation. The dry heath and grassland are also known to support a diversity of plants, invertebrates and breeding birds, as recognised with the associated biodiversity designations within this area (see Chapter 3). There are four Statements of Environmental Opportunity (SEOs) associated with this NCA as follows:
- SEO1: Conserve, enhance and increase public awareness of the distinctive historic landscape of the Brecks, which is of national and international significance, through securing and expanding its unique and varied habitat mosaic, protecting and managing its sensitive periglacial landscape and rich historic environment.
 - SEO2: Manage the Brecks' distinctive agricultural landscape to benefit biodiversity and soil and water quality, by promoting sustainable but productive farming practices that are able to adapt to changing agricultural economics, the considerable challenge of climate change and the increasing water stress within the NCA.
 - SEO3: Manage the Brecks' forest plantations and woodlands to combine commercial forestry and fuel production with a mix of habitats for rare and endangered plants and animals, enhancing both their capacity and capability as a national recreational resource and their role in climate change adaptation and regulation.
 - SEO4: Encourage measures which lead to the enhancement of landscape character and the historic environment, the sense of place and tranquillity, and the conservation of historic features when considering the design and location of new development and infrastructure and land management options, securing multiple benefits through the provision and management of high-quality green infrastructure networks.
- 5.9 South Suffolk and North Essex Claylands NCA⁴¹ is "an ancient landscape of wooded arable countryside with a distinct sense of enclosure. There is a complex network of old species-rich hedgerows, ancient woods and parklands, meadows with streams and rivers that flow

⁴⁰ Natural England (2015) National Character Area Profile 85. The Brecks [online] available at: <http://publications.naturalengland.org.uk/publication/4282581?category=587130>

⁴¹ Natural England (2014) National Character Area Profile 86. South Suffolk and North Essex Clayland [online] available at: <http://publications.naturalengland.org.uk/publication/5095677797335040?category=587130>

eastwards.” Much of the land is utilised for farming and recent changes in farming methods have “had an impact on farmland habitats such as hedges and ponds, and once-common species of arable land such as tree sparrow, grey partridge, cornflower and brown hare have declined in numbers.” There are four SEOs associated with this NCA as follows:

- SEO1: Maintain and enhance the character of this gently undulating, rural landscape by maintaining agricultural productivity and encouraging sustainable land management practices that protect and enhance the landscape, geodiversity and biodiversity assets and benefit carbon storage and water quality, as well as the over-riding sense of place.
- SEO2: Protect and enhance the area’s ancient woodland cover, parkland trees, river valley plantations and ancient hedgerows, through the management of existing woods and the planting of new woods, hedgerows and hedgerow trees to benefit landscape character, habitat connectivity and a range of ecosystem services, including timber provision, the regulation of soil erosion and the strengthening of the sense of place and history.
- SEO3: Enhance the slow-flowing, winding rivers and their pastoral valley flood plains that provide linkages through the landscape, including redundant sand and gravel extraction sites, for their ecological, historical and recreational importance. This will support the operation of natural processes and their contribution to biodiversity, geodiversity, soil quality, water availability, regulating water flow and the character of the area.
- SEO4: Conserve and enhance the distinctive character of the Dedham Vale Area of Outstanding Natural Beauty with its much visited ‘Constable Country’ and improve opportunities for people to enjoy and understand the distinctive assemblage of historic landscapes outside the AONB. Ensure that access and recreational resources are managed to be compatible with the tranquillity of the area and the special qualities of protected landscapes, while providing a valuable health, education and access resource.

Local landscape character

5.10 Landscape character plays an important part in understanding the relationship between people and place, identifying recognisable and distinct patterns in the landscape which make one area different from another. Landscape character can assist in the assessment of the likely significance of effects of change resulting from development and the value of landscape, both in visual and amenity terms. West Suffolk is a rural district with a varied landscape. The settlements within the district are generally distinct and set within the rural landscape. This means that the gaps between the settlements play a key role in retaining settlement identities.

5.11 The Brecks’ Special Qualities analysis report⁴² explores the extent to which different aspects of the Brecks’ heritage are significant in terms of their sensitivity to change and the degree to which they are valued, and this work includes a viewpoint analysis. The Brecks’ are located directly to the north of the Neighbourhood Plan area.

5.12 The Suffolk Landscape Character Assessment (LCA)⁴³ provides an assessment of the landscape character across the County and will form part of the evidence base for the emerging West Suffolk Local Plan Review. The assessment identifies a variety of Landscape Typologies within West Suffolk, including:

- Ancient Rolling Farmland;
- Undulating Estate Farmlands;
- Undulating Ancient Farmlands;
- Wooded Chalk Slopes;
- Rolling Estate Chalklands;
- Estate Sandlands;
- Rolling Estate Sandlands;

⁴² Sheilsflynn (no date) Brecks’ Special Qualities: An analysis of identity and sense of place [online] available at: <http://www.breakingnewground.org.uk/assets/LCAP/Brecks-Special-Qualities-Report-low-res.pdf>

⁴³ Suffolk Landscape Character Assessment [online] available at: <http://www.suffolklandscape.org.uk/>

- Plateau Estate Farmlands; and
- Valley Meadows and Fens.

5.13 In this respect, most of the Neighbourhood Plan area is within the 'Plateau Estate Farmlands' Landscape Typology. A corridor of land alongside the eastern boundary of the Neighbourhood Plan area (surrounding Cavenham Stream) is within the 'Wooded Chalk Slopes' Typology.

5.14 The key characteristics, key forces for change, and land management guidelines for the Plateau Estate Farmlands Landscape Typology are summarised below⁴⁴:

Key characteristics:

- Flat landscape of light loams and sandy soils;
- Large scale rectilinear field pattern;
- Network of tree belts and coverts;
- Large areas of enclosed former heathland;
- 18th- 19th & 20th century landscape parks;
- Clustered villages with a scattering of farmsteads around them; and
- Vernacular architecture is often 19th century estate type of brick and tile.

Key forces for change:

- Expansion of existing settlements into this landscape and creation of new settlement patterns and clusters associated with infrastructure development;
- Conversion and expansion of farmsteads for residential uses;
- Large-scale agricultural buildings in open countryside;
- Redevelopment of former airfield sites to new uses;
- Changes in the management and use of landscape parklands;
- The introduction of new agricultural techniques;
- Leisure as a driving force for changes in economic activity.

Land management guidelines

- Reinforce the historic pattern of regular boundaries;
- Restore the quality of elm hedges with coppice management;
- Restore, maintain and enhance the network of tree belts and pattern of small plantations found across much of this landscape type; and
- Restore, maintain and enhance the historic parklands and the elements within them.

5.15 The key characteristics, key forces for change, and land management guidelines for the Wooded Chalk Slopes Landscape Typology are summarised below⁴⁵:

Key characteristics:

- Rolling valleys;
- Shallow free-draining chalk soils;
- Scattered plantation woodlands;
- Fringed with ancient woodland;
- Planned rectilinear field patterns;

⁴⁴ Suffolk Landscape (no date): 'Plateau Estate Farmlands', [online] available to access via: <<http://www.suffolklandscape.org.uk/landscapes/Plateau-estate-farmlands.aspx>> last accessed [19/06/20]

⁴⁵ Suffolk Landscape (no date): 'Wooded Chalk Slopes', [online] available to access via: <<http://www.suffolklandscape.org.uk/landscapes/Wooded-chalk-slopes.aspx>> last accessed [19/06/20]

- Hawthorn hedges with few trees;
- Compact villages and a scattering of farms; and
- Flint and thatch vernacular buildings.

Key forces for change:

- Change of land use to horse paddocks;
- Construction of large agricultural buildings;
- Expansion of garden curtilage;
- Impact of deer on the condition of woodland cover; and
- Changes to settlement form pattern and building style.

Land management guidelines

- Reinforce the historic pattern of regular field boundaries;
- Maintain and increase the stock of hedgerow trees;
- Maintain the area of woodland cover; and
- Conserve and enhance areas of chalk grassland.

Tree preservation orders

5.16 Implemented by local planning authorities, Tree Preservation Orders (TPOs) are designated to protect specific trees, groups of trees or woodlands in the interests of their amenity value. When considering 'amenity' the local planning authority will likely take into consideration the following criteria⁴⁶:

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

5.17 In this context, West Suffolk Council have allocated several TPOs across the county in recognition of their amenity value⁴⁷. It is currently not possible to view the location of TPOs outside of the designated conservation areas within the district. As there are no conservation areas within Barrow cum Denham, contact with West Suffolk Council is required to ascertain whether there are any TPOs within the Neighbourhood Plan area.

Visual amenity

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

Summary of Future Baseline

5.19 New development has the potential to lead to incremental but small changes in landscape and villagescape character and quality in and around the Neighbourhood Plan area. This includes from the loss of landscape features and areas with an important visual amenity value.

5.20 In the absence of the Neighbourhood Plan, inappropriate levels of development within the open countryside could negatively impact upon the landscape features which contribute to the distinctive character and setting of the Neighbourhood Plan area.

⁴⁶ GOV.UK (2014): 'Tree Preservation Orders – General', [online] available to access via: <<https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas>> last accessed [18/03/20]

⁴⁷ West Suffolk Council (2020): 'Tree Preservation Orders', [online] available to access via: <<https://www.westsuffolk.gov.uk/planning/trees.cfm>> last accessed [19/06/20]

Key Sustainability Issues

- The nearest nationally protected landscape, the Suffolk Coast and Heaths AONB, is located approximately 30km to the south east of the Neighbourhood Plan area (at its nearest point).
- The Neighbourhood Plan area is however within a locally distinctive landscape.
- The Neighbourhood Plan area is within The Brecks NCA and the South Suffolk and North Essex Clayland NCA. The NCA profiles list several key characteristics and statements of environmental opportunities for these areas.
- Reflecting the results of the Suffolk LCA, the Neighbourhood Plan area is within the 'Plateau Estate Farmlands' and the 'Wooded Chalk Slopes' Landscape Typologies.
- The Suffolk LCA describes the key characteristics, key forces for change, and land management guidelines for the 'Plateau Estate Farmlands' and the 'Wooded Chalk Slopes'.
- West Suffolk Council have allocated several TPOs within the district in the interest of their amenity value. It is currently not possible to determine whether any of the TPOs are within the Neighbourhood Plan area.
- The views across the parish are also an important consideration in the planning process as the scale, height and mass of development can ultimately impact important views if they are not considered and assessed through the process.

What are the SEA objectives and appraisal questions for the Landscape SEA theme?

SEA objective	Assessment Questions
Protect and enhance the character and quality of landscapes and villagescapes.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve and enhance the natural beauty and special qualities of the Neighbourhood Plan area? • Conserve and enhance locally important landscape and villagescape features within the Neighbourhood Plan area? • Conserve and enhance local diversity and character? • Protect locally important viewpoints contributing to the sense of place and visual amenity of the Neighbourhood Plan area?

6. Historic Environment

Focus of Theme

- Designated and non-designated heritage assets
- Setting, special qualities and significance of heritage assets
- Locally important heritage assets
- Historic character of the Neighbourhood Plan area

Policy Context

6.1 Key messages from the National Planning Policy Framework (NPPF) include:

- Heritage assets should be recognised as an *'irreplaceable resource'* that should be conserved in a *'manner appropriate to their significance'*, taking account of *'the wider social, cultural, economic and environmental benefits'* of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- Plans should set out a *'positive strategy'* for the *'conservation and enjoyment of the historic environment'*, including those heritage assets that are most at risk.
- *'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'*

6.2 The policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Goal 6 'Enhanced beauty, heritage and engagement with the natural environment' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment' directly relates to the historic environment SEA theme.

6.3 The Government's Statement on the Historic Environment for England⁴⁸ sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.

6.4 Historic England is the statutory body that helps people care for, enjoy and celebrate England's spectacular historic environment. Guidance and advice notes provide essential information for local planning authorities, neighbourhood groups, developers, consultants, landowners and other interested parties on historic environment considerations, and are regularly reviewed and updated in light of legislative changes. The following guidance and advice notes are particularly relevant and should be read in conjunction with the others.

6.5 Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 – Second Edition (February 2019)⁴⁹ outlines ways to manage change that conserves and enhances historic areas in order to positively contribute to sustainable development. Principally, the advice note emphasises the importance of:

- Understanding the different types of special architectural and historic interest which underpin the designations; and
- Recognising the value of implementing controls through the appraisal and/or management plan which positively contribute to the significance and value of conservation areas.

⁴⁸ HM Government (2010): 'The Government's Statement on the Historic Environment for England', [online] available to access via: <http://webarchive.nationalarchives.gov.uk/+/http://www.culture.gov.uk/reference_library/publications/6763.aspx> last accessed [18/03/20]

⁴⁹ Historic England (2019): 'Conservation Area Designation, Appraisal and Management: Advice Note 1 (second edition)', [online] available to access via: <<https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/>> last accessed [17/06/20]

- 6.6 Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA): Historic England Advice Note 8 (December 2016)⁵⁰ provides support to all stakeholders involved in assessing the effects of certain plans and programmes on the historic environment. It offers advice on heritage considerations during each stage of the SA/SEA process and helps to establish the basis for robust and comprehensive assessments.
- 6.7 Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2nd Edition) (December 2017)⁵¹ provides general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views can contribute to setting. Specifically, Part 2 of the advice note outlines a five stepped approach to conducting a broad assessment of setting:
- Step 1: Identify which heritage assets and their settings are affected;
 - Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
 - Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
 - Step 4: Explore ways to maximise enhancement and avoid or minimise harm; and
 - Step 5: Make and document the decision and monitor outcomes.
- 6.8 Neighbourhood Planning and the Historic Environment: Historic England Advice Note 11 (October 2018)⁵² outlines the importance of considering the historic environment whilst preparing the plan (section 1), which culminates in a checklist of relevant issues to consider, followed by an overview of what this means in terms of evidence gathering (section 2). Sections 3 to 5 of the advice note focus on how to translate evidence into policy, understand the SEA process and Historic England's role in neighbourhood planning.
- 6.9 At the local level, the following policies within the Core Strategy (adopted 2010) for the St Edmundsbury area directly relate to the Historic Environment theme:
- Policy CS2: Sustainable Development;
 - Policy CS3: Design and Local Distinctiveness; and
 - Policy CS13: Rural Areas.
- 6.10 Additionally, the following aspiration within the Bury St Edmunds Vision 2031 directly corresponds to the Historic Environment theme: Aspiration 26 'The Historic and Natural Environment is Managed, Protected, Maintained and Enhanced'.

Baseline Summary

Summary of Current Baseline

Historic overview of the Neighbourhood Plan area

- 6.11 The following paragraphs have been summarised from the 'A Short History of Barrow' article on the Barrow cum Denham Parish Council website⁵³:

"While it is not known when Barrow was first settled, implements have been found dating back to the Palaeolithic era. However, the name of the village most probably comes from the Old English 'bearu', a grove, and not, as is sometimes thought, from the burial mounds of the same name.

⁵⁰ Historic England (2016): 'SA and SEA: Advice Note 8' [online] available to access via: <<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>> last accessed [18/03/20]

⁵¹ Historic England (2017): 'Setting of Heritage Assets: 2nd Edition', [online] available to access via: <<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>> last accessed [18/03/20]

⁵² Historic England (2018): 'Neighbourhood Planning and the Historic Environment', [online] available to access via: <<https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/>> last accessed [18/03/20]

⁵³ Barrow cum Denham Parish Council (2015): 'A Short History of Barrow', [online] available to access via: <<http://www.barrowcumdenhampc.com/village-information/history/>> last accessed [19/06/20]

“In the late Anglo-Saxon age, the village of Barrow belonged to King Edward the Confessor (r. 1042-1066) and is listed in the Domesday Book. Under the Normans, various noble families had the overlordship, including the Marshals, the Passelewes, Giffards and Tibetofts.

“In 1267, King Henry III (r. 1216-1277) granted Maud Passelewe the right to hold a weekly market at her manor in Barewe (sic).

“Under the Tudors, the manor of Barrow was sold in 1540 to Sir Clement Heigham. A devout Catholic, he rallied to the standard of Queen Mary, who was living at Framlingham Castle when the news came to her in July 1553 that her half-brother, Edward VI, had died. The Queen amply rewarded Sir Clement, making him Speaker of the House of Commons in the 1554 Parliament, which reunited the English Church with Rome, and eventually, Lord Chief Baron of the Exchequer. With the accession of Mary’s Protestant half-sister, Elizabeth, Sir Clement was obliged to retire from public life and died in 1570 in the manor house he had recently constructed. His splendid tomb may be seen in Barrow Church. Sir Clement’s son, Sir John, was also a Member of Parliament, but in contrast to his father, was a staunch Puritan. He is believed to have entertained Queen Elizabeth at the Manor House.

“Another prominent Barrovian is Mary Beale (1633-1699), born in the village as the daughter of the rector, John Cradock. She is one of the first woman in England to earn her living from her art as a portrait painter. She studied under Sir Peter Lely among others and had a studio in London from 1670 until her death. She is buried at St James’s, Piccadilly. Some of her portraits may be seen in Moyses Hall Museum in Bury and at the National Portrait Gallery. Another prominent figure was Edith Crack who was the last of several generations of hurdle makers and is believed to have been the only female hurdle maker in England. When she retired in 1978, this ancient craft ceased to be practised in Barrow.

“Barrow Church (All Saints) is a Grade I listed building. Some way off from the main settlement but adjacent to the former manor (as is often the pattern), the present building, although much altered and added to, is believed to have been erected in the 13th Century during the reign of Henry III, replacing an earlier Norman church, which would itself have replaced a wooden Saxon church. Nearby is Barrow Hall, a Grade II listed building, which has a moat enclosing the site of an ancient manor house. Another building of note is the Town Estate Room, which dates from the 17th Century but has a probable mediaeval core. Barrow Mill was demolished in 1926.

“The village hall was completed in 1955 and was built in honour of the coronation of the present Queen Elizabeth. The village sign was erected in 1991 and designed locally. It features a sword (to represent the Bronze Age swords uncovered in 1850), a steam traction engine (used extensively a century ago to help with harvesting and ploughing), a hurdle (see above), trees (to symbolise the village’s name) and ducks (another Barrow attraction)!

“Until comparatively recently, like most villages, Barrow was almost entirely self-sufficient, although most people of working age now travel to work. It is interesting to note that as late as 1981, there were a village shop (Watson’s Stores), a hairdresser’s, a pottery, a veterinary surgery and a doctor’s surgery all around the Green alone.”

Designated heritage assets and areas

Listed buildings

- 6.12 Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent. The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms.
- 6.13 The Planning (Listed Buildings and Conservation Areas) Act (1990)⁵⁴ protects listed buildings and conservation areas. It enforces controls on buildings and areas of special architectural or historical interest. The Neighbourhood Plan area contains one Grade I, one Grade II* and 30 Grade II nationally designated buildings which are protected through the Listed Buildings and

⁵⁴ Planning (Listed Buildings and Conservation Areas) Act (1990) [online] available at: <https://www.legislation.gov.uk/ukpga/1990/9/contents>

Conservation Areas Act 1990. The Grade I and II* listed buildings are as follows (as listed on Historic England's National Heritage List)⁵⁵:

- Church of All Saints (Grade I); and
- Church of St Mary (Grade II*).

Scheduled Monuments:

- 6.14 The Ancient Monuments and Archaeological Areas Act (1979)⁵⁶ allows the investigation, presentation and recording of matters of archaeological or historical interest and makes provision for the regulation of operations or activities which may affect ancient monuments and archaeological areas. Scheduled Monuments are nationally designated sites which are protected under the Act, and there are three within or within proximity to the boundaries of the Neighbourhood Plan area (as follows):

Moated site and associated fishpond to the south east of Barrow Hall: Designated in October 1981, the asset survives with a variety of original features and is a good example of a high status moated domestic enclosure⁵⁷.

Moated site at Denham Hall: Designated in March 2001, the site at Denham Hall survives well. The island remains largely undisturbed by post-medieval and modern activity and will likely retain archaeological evidence for structures and other features relating to the development and character of the site throughout its periods of occupation⁵⁸.

Motte and bailey at Denham Castle: Located approximately 100m to the west of the Neighbourhood Plan area boundary, the monument is one of the oldest on the Heritage Register and has not yet been reviewed under the Monuments Protection Programme. In this respect, Historic England note that these monuments do not yet have the full descriptions of their modernised counterparts⁵⁹.

Conservation areas

- 6.15 Conservation areas are designated because of their special architectural and historic interest. Conservation area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and providing a greater understanding and articulation of its character - mentioned within the 'Conservation Area Designation, Appraisal and Management' advice note by Historic England⁶⁰. In this respect, there are no conservation areas within Barrow cum Denham and therefore it is currently not possible to determine a detailed understanding of the special interest and historic character of the Neighbourhood Plan area through a consideration of a Conservation Area Appraisal or similar..

Locally important heritage features

- 6.16 It should be noted that not all the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life – whether at home, work or leisure. Although not designated, many buildings and areas are of historic interest and are important by local communities. For example, open spaces and key distinctive buildings are likely to have a local historic value.
- 6.17 The Historic Environment Record (HER) for Suffolk, accessed via the Heritage Gateway⁶¹, identifies the important distinctive structures or features that positively contribute to the local

⁵⁵ Historic England (2020): 'National Heritage List – Advance Search', [online database] available to access via: <<https://historicengland.org.uk/listing/the-list/advanced-search>> last accessed [04/04/20]

⁵⁶ Ancient Monuments and Archaeological Act (1979) [online] available at: <https://www.legislation.gov.uk/ukpga/1979/46>

⁵⁷ Historic England (2020): 'Moated site and associated fishpond to the south east of Barrow Hall', [online] available to access via: <<https://historicengland.org.uk/listing/the-list/list-entry/1019805>> last accessed [19/06/20]

⁵⁸ Historic England (2020): 'Moated site at Denham Hall', [online] available to access via: <<https://historicengland.org.uk/listing/the-list/list-entry/1019803>> last accessed [19/06/20]

⁵⁹ Historic England (2020): 'Motte and bailey at Denham Castle', [online] available to access via: <<https://historicengland.org.uk/listing/the-list/list-entry/1006020>> last accessed [19/06/20]

⁶⁰ Historic England (2016): 'Conservation Area Designation, Appraisal and Management Advice Note 1', [online] available to access via: <<https://www.historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>> last accessed [18/03/20]

⁶¹ Heritage Gateway (2020): 'Historic Environment Record for Suffolk', [online database] available to access via: <<https://www.heritagegateway.org.uk/gateway/>> last accessed [04/04/20]

distinctiveness and sense of place of the Neighbourhood Plan area. Following a high-level review of the HER, there are 71 features within Barrow (including records of ring ditches and pits; archaeological findspots dating to the Roman, Neolithic and Bronze Ages; Post-Medieval buildings; and ancient woodlands) and a further ten features within Denham (including local buildings; a 19th Century chimney; ancient woodland; and an archaeological findspot dating to the Bronze Age). These heritage assets are available to view on the Suffolk Heritage Explorer⁶², with a high-level overview provided below in **Figure 6A**.

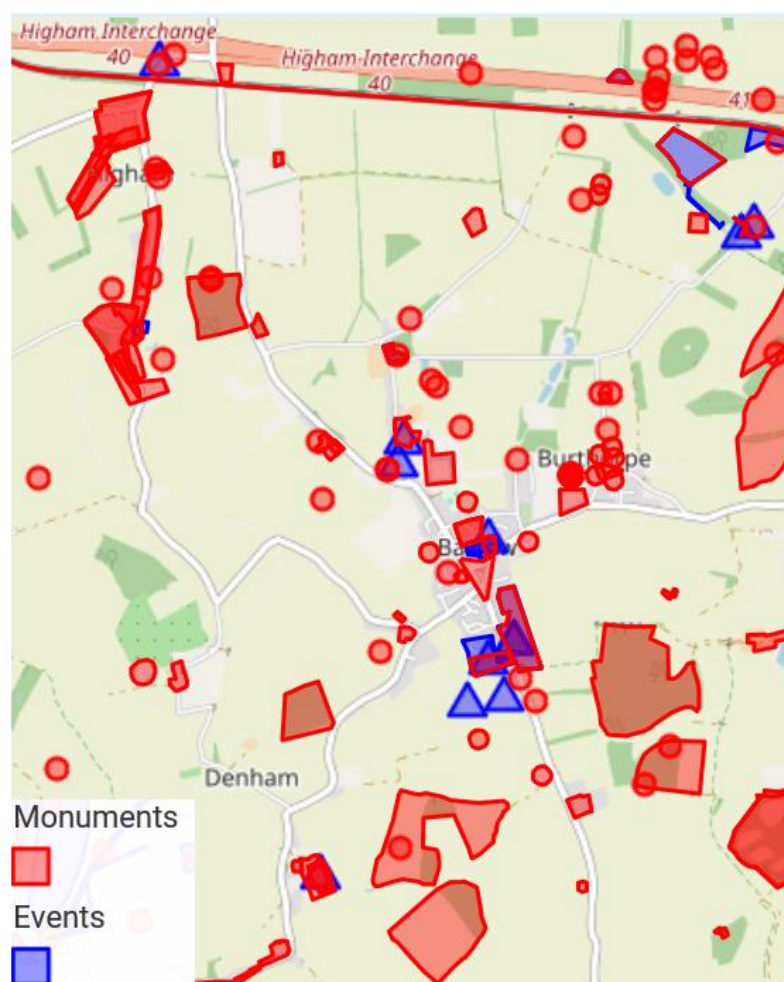


Figure 6A: Local Heritage Features within and surrounding Barrow cum Denham

Heritage at risk

- 6.18 Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I and Grade II* listed buildings, scheduled monuments, historic parks and gardens, registered battlefields, wreck sites and conservation areas deemed to be 'at risk'. According to the 2019 Heritage at Risk Register for the East of England⁶³, none of the heritage assets within the Neighbourhood Plan area considered to be 'at risk'.
- 6.19 It is important to recognise that the Heritage at Risk Registers for areas outside of London do not contain information about the status of Grade II listed buildings. As such, it is currently not possible to determine whether the Grade II listed building within the Neighbourhood Plan area are at risk.
- 6.20 **Figure 6.1** (below) shows the location of the designated heritage assets located within and within the immediate surroundings of the Neighbourhood Plan area.

⁶² Suffolk Heritage Explorer (2020): 'The Historic Environment Record for Suffolk – Interactive Map', [online] available to access via: <<https://heritage.suffolk.gov.uk/>> last accessed [19/06/20]

⁶³ Historic England (2019): 'Heritage at Risk Register for the East of England', [online] available to access via: <<https://historicengland.org.uk/images-books/publications/har-2019-registers/>> last accessed [19/06/20]

Summary of Future Baseline

- 6.21 New development areas in the Neighbourhood Plan area have the potential to impact on the fabric and setting of heritage assets; for example, through inappropriate design and layout. It should be noted, however, that existing historic environment designations offer a degree of protection to heritage assets and their settings.
- 6.22 Alongside, new development need not be harmful to the significance of a heritage asset, and in the context of the Neighbourhood Plan area there may be opportunity for new development to enhance the historic setting of the village and better reveal assets' heritage significance.

Key Sustainability Issues

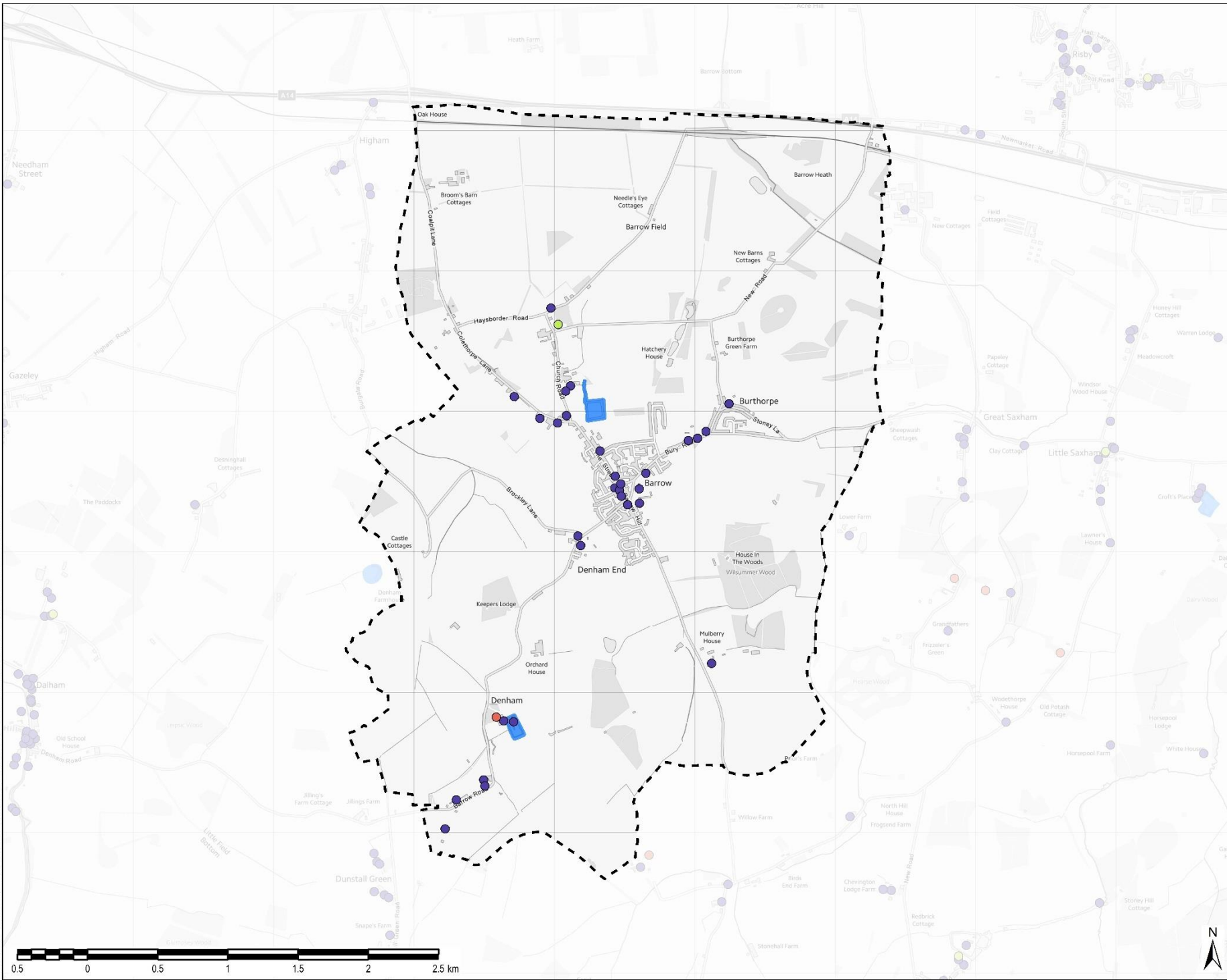
- The Neighbourhood Plan area has a rich historic environment.
- The Neighbourhood Plan area contains one Grade I, one Grade II* and 30 Grade II nationally designated buildings which are protected through the Listed Buildings and Conservation Areas Act 1990.
- It is currently not possible to determine whether the Grade II listed buildings within the Neighbourhood Plan area are at risk.
- There are three scheduled monuments within or within proximity to the Neighbourhood Plan area which are protected under the Ancient Monuments and Archaeological Areas Act 1979.
- There are no conservation areas within Barrow cum Denham and therefore it is currently not possible to determine a detailed understanding of the special interest and historic character of the Neighbourhood Plan area.
- Following a high-level review of the Suffolk HER, there are 71 features within Barrow. This includes records of ring ditches and pits; archaeological findspots dating to the Roman, Neolithic and Bronze Ages; Post-Medieval buildings; and ancient woodlands.
- The Suffolk HER lists a further ten features within Denham, including local buildings; a 19th Century chimney; ancient woodland; and an archaeological findspot dating to the Bronze Age.

What are the SEA objectives and appraisal questions for the Historic Environment SEA theme?

SEA objective Assessment Questions

Protect, conserve and enhance heritage assets within the Neighbourhood Plan area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting? • Conserve and enhance the special interest, character and appearance of locally important features and their settings? • Support the integrity and the historic setting of sites of archaeological or historic interest recorded on the HER? • Support access to, interpretation and understanding of the historic evolution and character of the environment? • Conserve and enhance archaeological remains, including historic landscapes? • Provide a positive strategy for the conservation and enhancement of the area's historic environment by guiding development proposals to address issues identified as threats to the character or appearance of heritage assets? • Guide development proposals to secure remediation of issues identified as affecting heritage assets and prevent cumulative impacts?
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File Name: I:\504 - Information Systems\6071087_Neighbourhood Plan_CRII_2018_202022_Maps\Barrow cum Denham NP Steering Group\Figure 6.1 - Historic Environment Designations.mxd



THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

LEGEND

- Barrow cum Denham Neighbourhood Plan Area
- Scheduled Monument
- Listed Building**
- Grade I
- Grade II*
- Grade II

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Purpose of Issue		FINAL	
Client		BARROW CUM DENHAM NEIGHBOURHOOD PLAN STEERING GROUP	
Project title		STRATEGIC ENVIRONMENTAL ASSESSMENT FOR THE BARROW CUM DENHAM NEIGHBOURHOOD PLAN	
Drawing Title		HISTORIC ENVIRONMENT DESIGNATIONS	
Drawn CN	Checked JW	Approved RP	Date 08/06/2020
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FIGURE 6.1		01	

7. Land, Soil and Water Resources

Focus of Theme

- Quality of agricultural land
- Water resources and water quality
- Mineral safeguarding areas

Policy Context

- 7.1 The EU's Soil Thematic Strategy⁶⁴ presents a strategy for protecting soil resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.
- 7.2 Adopted in October 2000, the purpose of the EU Water Framework Directive (WFD) is to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater, driving a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention is to establish a 'framework for integrated catchment management' across England. The Environment Agency is establishing 'Significant Water Management Issues' and recently presented second River Basin Management Plans to ministers. The plans seek to deliver the objectives of the WFD namely:
- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems;
 - Promote the sustainable use of water;
 - Reduce the pollution of water, especially by 'priority' and 'priority hazardous' substances;
 - Ensure the progressive reduction of groundwater pollution; and
 - Contribute to achieving 'good' water quality status for as many waterbodies as possible by 2027.
- 7.3 Key messages from the NPPF include:
- *'Planning policies and decisions should contribute to and enhance the natural and local environment by:*
 - protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; and*
 - recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'*
 - Prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.
 - *'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.'*
 - *'Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.'*

⁶⁴ European Commission (2006): 'Soil Thematic Policy', [online] available to access via: http://ec.europa.eu/environment/soil/index_en.htm last accessed [18/03/20]

- Planning policies and decisions should ‘give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs’, and ‘promote and support the development of under-utilised land and buildings.’
 - Taking a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.
 - Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.
 - The government has produced a separate plan that specifically deals with planning policy in relation to waste management; this should be read in conjunction with the NPPF.
- 7.4 Along with the policies contained within Chapter 1 ‘Using and managing land sustainably’ and Chapter 4 ‘Increasing resource efficiency, and reducing pollution and waste’, Goal 2 ‘Clean and plentiful water’, Goal 5 ‘Using resources from nature more sustainably and efficiently’ and Goal 8 ‘Minimising waste’ of the Government’s ‘A Green Future: Our 25 Year Plan to Improve the Environment’ directly relates to the land, soil and water resources SEA theme.
- 7.5 Other key documents at the national level include Safeguarding our Soils: A Strategy for England⁶⁵, which sets out a vision for soil use in England, and the Water White Paper⁶⁶, which sets out the Government’s vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.
- 7.6 In terms of waste management, the Government Review of Waste Policy in England⁶⁷ recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials. The National Waste Management Plan⁶⁸ provides an analysis of the current waste management situation in England and evaluates how it will support the implementation of the objectives and provisions of the revised Waste Framework Directive⁶⁹. This includes an assessment of the need for new collection schemes, additional waste infrastructure and investment channels, as well as providing general or strategic waste management policies.
- 7.7 The Suffolk Minerals & Waste Development Scheme seeks to outlay the “*programme for the preparation of the Suffolk Minerals and Waste Development Framework*”⁷⁰ as Suffolk County Council have decided that it will produce a single Suffolk Minerals & Waste Local Plan to replace all three of the existing Development Plan Documents. The Plan will make provision for minerals and waste development until 2036 and will identify further sites for sand and gravel extraction as well as plan for the provision of waste facilities equivalent to the amount of waste arising within the County. The Suffolk Minerals and Waste Local Plan was submitted to the Planning Inspectorate in December 2018 for examination in public.
- 7.8 River Basin Management Plans (RBMPs) set out a framework for how all river basin stakeholders, including water companies and local communities, can help improve the quality of the water environment. There are eight RBMPs in England which all have a harmonised plan period of 2015-2021 and are reviewed every five years. West Suffolk falls within the Anglian River Basin District and the Anglian River Basin Management Plan⁷¹ provides a framework for protecting and enhancing the benefits provided by the water environment.

⁶⁵ Defra (2009): ‘Safeguarding our Soils: A strategy for England’, [online] available to access via: <<https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>> last accessed [18/03/20]

⁶⁶ Defra (2011): ‘Water for life (The Water White Paper)’, [online] available to access via: <<http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>> last accessed [18/03/20]

⁶⁷ Defra (2011): ‘Government Review of Waste Policy in England’, [online] available at: <<http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf>> last accessed [18/03/20]

⁶⁸ DEFRA (2013) Waste Management Plan for England [online] available to access via: <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf> last accessed [18/03/20]

⁶⁹ Directive 2008/98/EC

⁷⁰ Suffolk County Council (2018) Suffolk Minerals & Waste Development Scheme [online] available at: <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Public-Enquiry/PC-6-Suffolk-Minerlas-Waste-Development-Scheme.pdf>

⁷¹ Environment Agency (2015) Water for life and livelihoods – Part 1: Anglian river basin district River basin management plan [online] available at:

- 7.9 Water Resource Management Plans (WRMP) are prepared by water companies to ensure supply continues to meet demand into the future, even under water stressed conditions. WRMPs cover 25-year planning periods to ensure that long term needs, trends and changes are considered appropriately at a strategic level. Anglian Water supply the West Suffolk area⁷² and the 2015 WRMP is soon to be replaced by the Draft WRMP 2019. The 2019 report will detail how Anglian Water will manage water resources between 2020 and 2045. The current plan covers the period 2015 to 2040 and key elements of this plan include:
- Supporting water efficiency;
 - Reducing the number of leaks from the pipes transporting water;
 - Transferring water from areas with a surplus to those with a shortage; and
 - Developing long-term additional supplies.
- 7.10 The adopted Suffolk County Council Minerals Core Strategy⁷³, Minerals Specific Site Allocations⁷⁴ and Waste Core Strategy⁷⁵ all form part of the current Suffolk Minerals & Waste Development Framework.
- 7.11 The West Suffolk Brownfield Register⁷⁶ comprises all brownfield sites that have been assessed as appropriate for residential development after meeting initial conditions such as being capable of supporting development of five or more dwellings and being suitable and available for housing development.
- 7.12 The West Suffolk Contaminated Land Strategy⁷⁷, in line with statutory requirements, ensures that contaminated land is identified and remediated to a state where the land is suitable for use and does not pose a significant risk to health or the environment.
- 7.13 At the local level, the following policies within the Core Strategy (adopted 2010) for the St Edmundsbury area directly relate to the Land, Soil and Water Resources theme:
- Policy CS2: Sustainable Development
- 7.14 Additionally, the following policies and aspirations within the Bury St Edmunds Vision 2031 directly correspond to the Land, Soil and Water Resources theme:
- Policy BV10: Housing on Brownfield Sites;
 - Aspiration 10: Both New and Existing Development have high Environmental Standards of Resource Efficiency; and
 - Aspiration 14: The Provision of Infrastructure and Services helps to Facilitate and Meet the Growing Needs of Town and the Surrounding Hinterland.

Baseline Summary

Summary of Current Baseline

Soil resources

- 7.15 The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural land' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile'

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718327/Anglian_RBD_Part_1_river_basin_management_plan.pdf

⁷² Anglian Water (2019) Water resources management plan [online] available at: <https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/water-resources-management-plan/>

⁷³ Suffolk County Council (2008) Minerals Core Strategy [online] available at: <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Minerals-Core-Strategy-Adopted-Version.pdf>

⁷⁴ Suffolk County Council (2009) Minerals Specific Site Allocations [online] available at: <https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/minerals-specific-site-allocation-documents/>

⁷⁵ Suffolk County Council (2011) Waste Core Strategy [online] available at: <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Waste-Core-Strategy.pdf>

⁷⁶ West Suffolk Council (2019) Brownfield Register [online] available at: https://www.westsuffolk.gov.uk/planning/Planning_Policies/brownfield-register.cfm

⁷⁷ West Suffolk Council (2019) West Suffolk Contaminated Land Strategy [online] available at: <https://www.westsuffolk.gov.uk/environment/upload/WSC-Contaminated-Land-Strategy-2019.pdf>

(BMV) land and Grades 3b to 5 of poorer quality. In this context, there is a need to avoid loss of higher quality 'best and most versatile' agricultural land.

- 7.16 In terms of the location of the best and most versatile agricultural land, a detailed classification has not been undertaken for the areas of undeveloped land in Barrow-cum-Denham. The provisional ALC dataset provided by Natural England indicates that the undeveloped areas of Barrow cum Denham Parish are predominantly underlain by areas of Grade 2 (southern and western sections) and Grade 3 (northern and eastern sections) agricultural land. The Neighbourhood Plan area therefore has the potential to contain some of the best and most versatile land for agricultural purposes.
- 7.17 However, in the absence of a detailed 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. Nevertheless, the results of the 'Predictive Best and Most Versatile (BMV) Land Assessment' for Eastern England provided by Natural England⁷⁸ indicates that most of the undeveloped areas of land within Barrow-cum-Denham have a greater than 60% chance of being underlain by BMV agricultural land. This broadly aligns within the national data.

Water resources and quality

- 7.18 The water resources located within and within proximity to the Neighbourhood Plan area include the Cavenham Stream (a tributary of the River Lark), alongside a network of drainage ditches. The River Lark is located approximately 6km to the north east of the Neighbourhood Plan area and flows through the settlement of Bury St Edmunds. The Neighbourhood Plan area is identified as a water scarce area.
- 7.19 Barrow cum Denham is located within the Anglican River Basin District, overlapping with the 'Lark' Operational Catchment⁷⁹. There are ten waterbodies within the 'Lark' Operational Catchment, one of which are identified as flowing alongside the north eastern and eastern boundaries of the Neighbourhood Plan area, namely: Cavenham Stream.
- 7.20 As shown on the Environment Agency's Catchment Data Explorer, the most recently completed water quality assessments undertaken in 2016 classifies the Cavenham Stream⁸⁰ as having a 'good' chemical status and a 'good' ecological status. Although the watercourse has an overall classification as 'good', the primary reasons which could potentially lead to a deterioration in water quality are attributed to ground water and surface water abstraction activities linked to the water industry and to agricultural and land management practices.
- 7.21 The Nitrates Directive (91/676/EEC) requires Member States to identify areas where groundwater have nitrate concentrations of more than 50 mg/l nitrate or are thought to be at risk of nitrate contamination. Areas associated with such groundwater are designated as Nitrate Vulnerable Zones (NVZs) within which, Member States are required to establish Action Programmes to reduce and prevent further nitrate contamination. In this regard, the Neighbourhood Plan overlaps the 'Ely Ouse and Cut-off channel' Surface Water NVZ, and the 'Anglian Chalk' Ground Water NVZ. However, it is useful to note that as the Neighbourhood Plan is likely to allocate land for residential development and potential employment areas, such uses are not considered to significantly increase the risk of pollution to the NVZs.
- 7.22 Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. In this respect, there are three SPZs within the Neighbourhood Plan area. Specifically: 'Zone I: Inner Protection Zone' (north eastern section), 'Zone II: Outer Protection' (central and southern sections) and Zone III 'Total Catchment' (western and north western sections).

⁷⁸ Natural England (2017) Likelihood of Best and Most Versatile (BMV) Agricultural Land – Eastern Region [online] available from: <<http://publications.naturalengland.org.uk/publication/6205542189498368?category=5208993007403008>> last accessed [17/06/20]

⁷⁹ Environment Agency (2020): 'Catchment Data Explorer – Lark Operational Catchment', [online] available to access via: <<https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3249>> last accessed [17/06/20]

⁸⁰ Environment Agency (2020): 'Catchment Data Explorer – Cavenham Stream', [online] available to access via: <<https://environment.data.gov.uk/catchment-planning/WaterBody/GB105033043000>> last accessed [17/06/20]

Mineral resources

- 7.23 Mineral resources are defined as natural concentrations of minerals or, in the case of aggregates, bodies of rock that are, or may become, of potential economic interest due to their inherent properties. They make an essential contribution to the country's prosperity and quality of life. Since minerals are a non-renewable resource, minerals safeguarding is the process of ensuring that non-minerals development does not needlessly prevent the future extraction of mineral resources, of local and national importance⁸¹.
- 7.24 The Suffolk Minerals Core Strategy identifies mineral extraction sites within the County. In this respect, the northern section of the Neighbourhood Plan area is within the category of 'broad sand and gravel extraction, aggregate handling and recycling services'⁸².

Summary of Future Baseline

- 7.25 Future development has the potential to affect water quality through diffuse pollution, wastewater discharges, water run-off, and modification. Water companies are likely to maintain adequate water supply and wastewater management over the plan period, and the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality within the Neighbourhood Plan area and wider area. However, it will be important for new development to avoid impacts on water quality and to contribute to reducing consumption and improving efficiency.
- 7.26 Due to the prevalence of BMV agricultural land within sections of the undeveloped areas of the parish, new developments which are located outside of the settlement will likely lead to losses of higher quality (best and most versatile) agricultural land.

Key Sustainability Issues

- The provisional ALC dataset provided by Natural England indicates that the undeveloped areas of Barrow cum Denham Parish are predominantly underlain by areas of Grade 2 and Grade 3 agricultural land.
- In the absence of a detailed 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.
- The results of the 'Predictive Best and Most Versatile (BMV) Land Assessment' for Eastern England indicates that most of the undeveloped areas of land within Barrow-cum-Denham have a greater than 60% chance of being underlain by BMV land.
- The water resources located within and within proximity to the Neighbourhood Plan area include the Cavenham Stream (a tributary of the River Lark), alongside a network of drainage ditches.
- The Neighbourhood Plan area is identified as a water scarce area.
- The primary reasons which could potentially lead to a deterioration in water quality are attributed to ground water and surface water abstraction activities linked to the water industry and to agricultural and land management practices.
- The Neighbourhood Plan overlaps the 'Ely Ouse and Cut-off channel' Surface Water NVZ, and the 'Anglian Chalk' Ground Water NVZ.
- There are three SPZs within the Neighbourhood Plan area. Specifically: 'Zone I: Inner Protection Zone', 'Zone II: Outer Protection' and Zone III 'Total Catchment'.
- Regarding mineral resources, the northern section of the Neighbourhood Plan area is within the category of 'broad sand and gravel extraction, aggregate handling and recycling services' in association with the Suffolk Minerals Core Strategy.

⁸¹ GOV.UK (2014): 'Minerals Guidance', [online] available to access via: <<https://www.gov.uk/guidance/minerals>> last accessed [18/03/20]

⁸² Suffolk County Council (2019) Key Diagram- Map A Suffolk Minerals and Core Strategy [online] available at: <<https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Minerals-Core-Strategy-Adopted-Version.pdf>> last accessed [17/06/20]

What are the SEA objectives and appraisal questions for the Land, Soil and Water Resources SEA theme?

SEA objective	Assessment Questions
Ensure the efficient and effective use of land.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> Promote the use of previously developed land? Avoid the development of the best and most versatile agricultural land, which in the parish may comprise Grade 1 to 3a agricultural land? Protect the integrity of mineral safeguarding areas?
Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> Reduce the amount of waste produced? Support the minimisation, reuse and recycling of waste? Maximise opportunities for local management of waste in order to minimise export of waste to areas outside? Encourage recycling of materials and minimise consumption of resources during construction?
Use and manage water resources in a sustainable manner.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> Support improvements to water quality? Minimise water consumption? Protect surface water resources?

8. Population and Community

Focus of Theme

- Population size
- Population density
- Age structure
- Deprivation
- Housing mix and affordability
- Education and skills

Policy Context

8.1 Key messages from the NPPF include:

- One of the three overarching objectives of the NPPF is a social objective to; *'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.'*
- To support the Government's objective of significantly boosting the supply of housing, strategic policies *'should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'*
- The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site where possible.
- Recognise the important contribution of small and medium sized development sites in meeting housing needs. Local Plans should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, and neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites.
- In rural areas, planning policies and decisions should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high-quality public spaces, which encourage the active and continual use of public areas.
- Ensuring that there is a *'sufficient choice of school places'* and taking a *'proactive, positive and collaborative approach'* to bringing forward *'development that will widen choice in education'*.

8.2 The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change⁸³ warns that society is underprepared for an ageing population. The

⁸³ Select Committee on Public Service and Demographic Change (2013): 'Ready for Ageing?', [online] available to access via: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/> last accessed [18/03/20]

report states that *'longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises'*. The report recognises that the supply of specialist housing for the older generation is insufficient for the demand. There is a need for central and local Government, housing associations, and house builders to ensure that these housing needs are better addressed, giving as much priority to promoting an adequate market of social housing for the older generation as is given to the younger generation.

- 8.3 The West Suffolk Housing Delivery Study (2019)⁸⁴ is a report that focusses on how West Suffolk Council can work with private and public sector partners to deliver the new homes that are needed in the area over the next 15-20 years. It supports the West Suffolk Housing Strategy⁸⁵ 2018-2023, which sets out to increase the supply, range and quality of housing available for current and future residents.
- 8.4 The West Suffolk Strategic Framework 2018-20⁸⁶ includes provisions for supporting and investing in West Suffolk Communities and businesses, with the aim of encouraging *"growth in prosperity and quality of life for all"*.
- 8.5 The West Suffolk Growth Investment Strategy⁸⁷ aims to support the delivery of the growth priorities in the West Suffolk Strategic Framework 2018-2020, and the West Suffolk Medium Term Financial Strategy for 2017-20. These seek to drive economic growth in a manner beneficial to all plan area residents, blending financial, economic and social considerations.
- 8.6 At the local level, the following policies within the Core Strategy (adopted 2010) for the St Edmundsbury area directly relate to the Population and Community theme:
- Policy CS5: Affordable Housing;
 - Policy CS6: Gypsies, Travellers and Travelling Showpeople;
 - Policy CS9: Employment and the Local Economy;
 - Policy CS10: Retail, Leisure, Cultural and Office Provision; and
 - Policy CS14: Community infrastructure capacity and tariffs.
- 8.7 Additionally, the following policies and aspirations within the Bury St Edmunds Vision 2031 directly correspond to the Population and Community theme:
- Aspiration 1: Every Resident Has A Sustainable and Suitable Home;
 - Aspiration 4: The Local Economy Is Prosperous and Dynamic;
 - Aspiration 14: The Provision of Infrastructure and Services Helps to Facilitate and Meet the Growing Needs;
 - Aspiration 16: More People Access Cultural and Leisure Opportunities;
 - Aspiration 20: Issues of Deprivation are Considered and Dealt with Appropriately;
 - Policy BV12: New and Existing Local Centres and Community Facilities;
 - Policy BV21: Allotments; and
 - Policy BV24: Safeguarding Educational Establishments.

⁸⁴ West Suffolk Council (2019) The West Suffolk Housing Delivery Study [online] available at:

https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/West-Suffolk-Housing-Delivery-Report.pdf

⁸⁵ Forest Heath and St Edmundsbury Council (2018) West Suffolk Housing Strategy 2018 – 2023 [online] available at:

https://www.westsuffolk.gov.uk/Council/Policies_Strategies_and_Plans/upload/Housing-Strategy-2018-2023.pdf

⁸⁶ Forest Heath & St Edmundsbury Council (2017) West Suffolk Strategic Framework [online] available at:

https://www.westsuffolk.gov.uk/Council/Policies_Strategies_and_Plans/upload/StrategicFramework2018-20.pdf

⁸⁷ Forest Heath & St Edmundsbury Council (2017) West Suffolk Growth Investment Strategy [online] available at:

https://www.westsuffolk.gov.uk/Council/Policies_Strategies_and_Plans/More_plans_and_policies/upload/WestSuffolkGrowthInvestmentStrategy.pdf

Baseline Summary

Summary of Current Baseline

Population

- 8.8 Census data presented in **Table 8.1** (below) shows that the population of Barrow cum Denham has increased by 16.8% between 2001-2011, higher than the totals for St Edmundsbury (13.1%), the East of England (8.5%) and England as a whole (7.9%). Notably, the rate of population increase in Barrow cum Denham was nearly double that of the East of England region in the same time period and over double that of England as a whole.

Table 8.1 Population change (2001-2011)

	Barrow cum Denham	St Edmundsbury	East	England
2001	1,604	98,193	5,388,140	49,138,831
2011	1,874	111,008	5,846,965	53,012,456
Population change 2001-2011	16.8%	13.0%	8.5%	7.9%

Source: ONS, Tables KS001 (2001) and KS101EW (2011), AECOM calculations

Age structure

- 8.9 **Table 8.2** (below) shows that the most populous age bracket of the Neighbourhood Plan area is 60+, representing nearly 32.0% of the population of Barrow cum Denham. This indicates that the proportion of the population aged 60+ is notably higher in the Neighbourhood Plan area than in St Edmundsbury district (25.7%), the East of England region (23.9%) and England as a whole (22.3%).

Table 8.2: Age structure, 2011

Age band	Barrow cum Denham	St Edmundsbury	East	England
0-15	20.3%	18.3%	18.9%	18.9%
16-24	7.4%	10.5%	10.9%	11.9%
25-44	21.0%	26.1%	26.5%	27.5%
45-59	19.5%	19.4%	19.8%	19.4%
60+	31.8%	25.7%	23.9%	22.3%
Total population	1,874	111,008	5,846,965	53,012,456

Source: ONS (2011) Table KS102EW, AECOM calculations

Household deprivation

- 8.10 Census statistics measure deprivation across four 'dimensions' of deprivation, summarised below:

- **Employment:** Any person in the household (not a full-time student) that is either unemployed or long-term sick.

- **Education:** No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
- **Health and Disability:** Any person in the household that has generally ‘bad’ or ‘very bad’ health or has a long-term health problem.
- **Housing:** The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.

Table 8.3 Household deprivation

	Barrow cum Denham	St Edmundsbury	East	England
Household not deprived in any dimension	48.1%	46.8%	44.8%	42.5%
Households deprived in 1 dimension	34.4%	33.3%	32.9%	32.7%
Households deprived in 2 dimensions	15.8%	16.3%	17.9%	19.1%
Households deprived in 3 dimensions	1.6%	3.3%	3.9%	5.1%
Households deprived in 4 dimensions	0.1%	0.3%	0.4%	0.5%

8.11 Based on the information presented in **Table 8.3** (above), a lower percentage of households are deprived within the Neighbourhood Plan area in comparison to the totals for St Edmundsbury, East of England and England. Most of the households in the Neighbourhood Plan area are deprived in one or two dimensions, similar to the regional and national trends.

Index of multiple deprivation

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

- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).
- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- **Education, Skills and Training:** The lack of attainment and skills in the local population.
- **Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
- **Crime:** The risk of personal and material victimisation at local level.
- **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
 - **‘Geographical Barriers’:** relating to the physical proximity of local services.
 - **‘Wider Barriers’:** relating to access to housing, such as affordability.
- **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
 - **‘Indoors Living Environment’** measures the quality of housing.
 - **‘Outdoors Living Environment’** measures air quality and road traffic accidents.

8.13 Two supplementary indices (subsets of the Income deprivation domains), are also included:

- **Income Deprivation Affecting Children Index:** The proportion of all children aged 0 to 15 living in income deprived families.
- **Income Deprivation Affecting Older People Index:** The proportion of all those aged 60 or over who experience income deprivation.

8.14 Lower Super Output Areas (LSOAs)⁸⁸ are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2019, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales.

8.15 The Neighbourhood Plan area lies within the St Edmundsbury 008A LSOA, which is ranked overall as within the 30% least deprived areas of the county. However, it is ranked within the 50% most deprived areas with regards to living environment and deprivation.

Housing tenure

8.16 As per **Figure 8.1** (below), most residents within the Neighbourhood Plan area own their home outright (74.6%), greater than estimates for the district (66.9%), East (67.6%) and England as a whole (63.3%). Comparatively, a low number of residents in Barrow cum Denham live in socially and privately rented accommodation (23.7%).

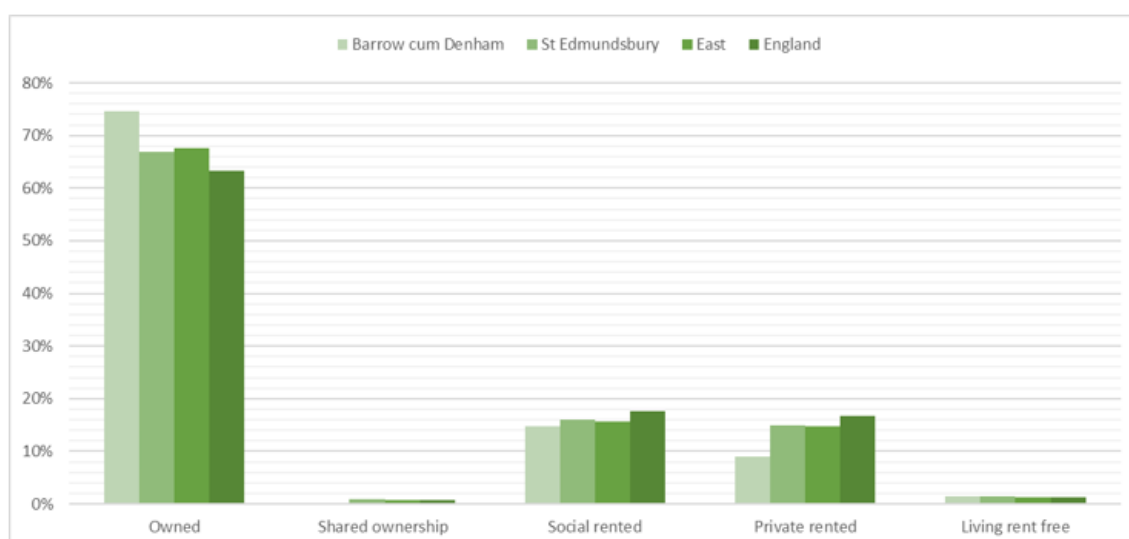


Figure 8.1: Housing tenure

Source: ONS (2011) Table QS405EW, AECOM calculations

Education

8.17 Census data presented in **Figure 8.2** (overleaf) shows that a comparatively high number of residents in the Neighbourhood Plan area hold no qualifications (24.6%) in comparison to St Edmundsbury (22.4%), the East of England (22.5%) and England as a whole (20.7%). However, of those residents which do, many residents in Barrow cum Denham have Level 4 qualifications (26.5%) in comparison to St Edmundsbury (24.6%), the East of England (22.5%) and England as a whole (20.7%). This indicates a degree of disparity with regards to education levels between residents within the Neighbourhood Plan area.

8.18 The Primary School serves other parishes as well as Barrow and Denham and is at full capacity. Its facilities will be impacted by future growth within the Neighbourhood Plan area.

⁸⁸ MHCLG (2019): Indices of Deprivation Explorer', [online] available at: http://dclgapps.communities.gov.uk/imd/iod_index.html

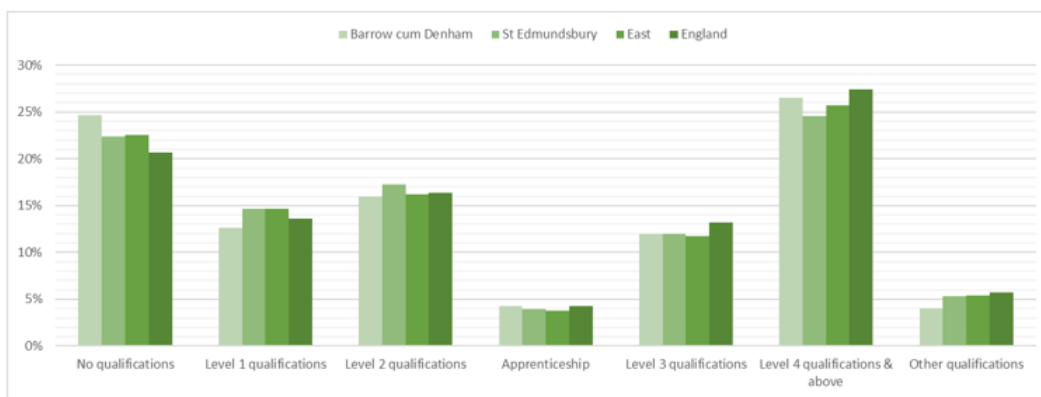


Figure 8.2: Level of Qualification

Source: ONS (2011) Table QS501EW, AECOM calculations

Employment

8.19 **Figure 8.3** (below) shows statistics for occupational bands of residents within the Neighbourhood Plan area. Accordingly, the following occupation types are the most common:

- Professional occupations (16.9%);
- Skilled trades occupations (14.4%);
- Managers, directors, senior officials (12.7%); and
- Associate professional & technical occupations (12.1%).

8.20 The proportion of residents in skilled trades is notably higher than figures for the district (12.6%), regional (11.9%) and national averages (11.4%). Further, residents who work in caring, leisure & other service occupations (11.4%), though not as common as other professions within Barrow cum Denham, is comparatively high in comparison to averages for St Edmundsbury (10.1%), the East (9.3%) and England as a whole (9.3%).

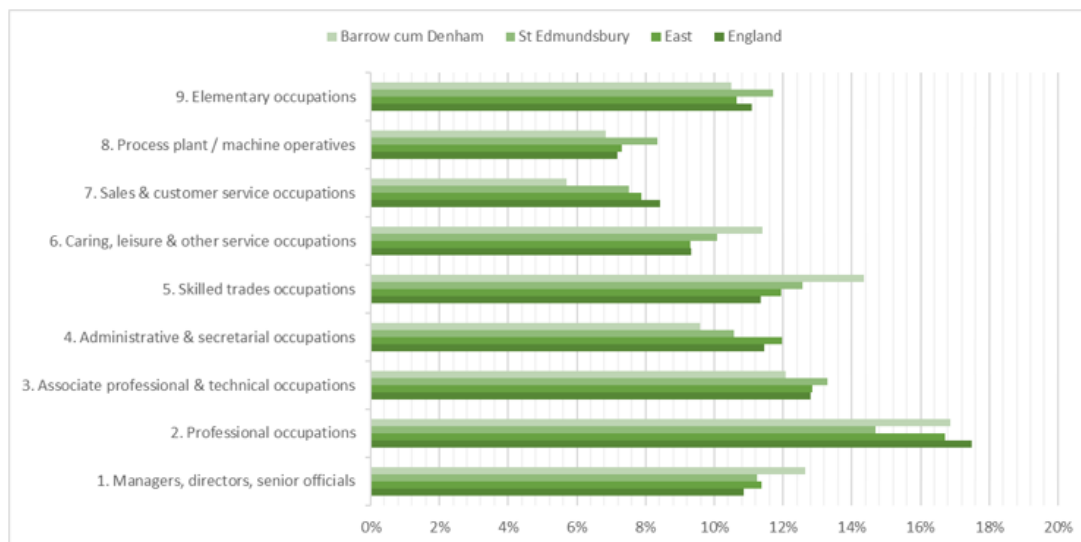


Figure 8.3 Occupation of usual residents

Source: ONS (2011) Tables KS608EW and KS610EW, AECOM calculations

Community assets

8.21 With regards to community assets, Barrow is generally well served by local service offer. The village area concentrated in the Barrow settlement has a primary school, play school, a doctor's surgery, two pubs, three village shops and a hairdresser. It also has a well-used Post Office

which serves many of the surrounding villages, sheltered accommodation, recreation grounds, sporting facilities and a stable. There are many clubs and organisations for all ages. Community events include the Village Fete, Flower Show, Bonfire Night and Beer Festival⁸⁹.

Summary of Future Baseline

8.22 As the population of the Neighbourhood Plan area continues to age, this could potentially negatively impact upon the future vitality of the local community and economy of certain parts of the Neighbourhood Plan area, whilst also placing additional pressures to existing services and facilities. The suitability (e.g. size and design) and affordability of housing for local requirements depends on the implementation of appropriate housing policies through the Local Plan and Neighbourhood Plan. Unplanned development may have wider implications in terms of transport and access to infrastructure, or the natural environment.

Key Sustainability Issues

- The largest age group within the population are those aged 60 or over (31.8%), which indicates an ageing population within the Neighbourhood Plan area.
- Population growth within the Neighbourhood Plan area has been high between 2001-2011 (16.8%) in comparison to district-level, regional and national figures.
- A higher percentage of residents have no qualifications in comparison to the district-level, regional and national figures. The Primary School is at full capacity, and its facilities will be impacted by future growth within the Neighbourhood Plan area.
- The Neighbourhood Plan area has a range of local community facilities which serve the needs of the local community and play a vital role in supporting the Parish's sense of identity.

What are the SEA objectives and appraisal questions for the Population and Community SEA theme?

SEA objective	Assessment Questions
Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Encourage and promote social cohesion and encourage active involvement of local people in community activities? • Minimise fuel poverty? • Maintain or enhance the quality of life of existing local residents? • Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people?
Reduce deprivation and promote a more inclusive and self-contained community.	<ul style="list-style-type: none"> • Support the provision of land for allotments and cemeteries? • Provide housing in sustainable locations that allow easy access to a range of local services and facilities?
Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support the provision of a range of house types and sizes? • Support enhancements to the current housing stock? • Meet the needs of all sectors of the community? • Provide quality and flexible homes that meet people's needs? • Promote the use of sustainable building techniques and materials? including use of sustainable building materials in construction?

⁸⁹ Barrow cum Denham Parish steering group (2014): Parish Plan (part II) [online] available at: <http://www.barrowcumdenhampc.com/wp-content/uploads/2017/02/Part-II.pdf>

9. Health and Wellbeing

Focus of Theme

- Health indicators and deprivation
- Influences on health and wellbeing

Policy Context

9.1 Key messages from the NPPF include:

- One of the three overarching objectives of the NPPF is a social objective to; *‘support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural wellbeing.’*
- *‘Planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.’*
- Policies and decisions should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
- Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. Development should avoid building on existing open space, sports and recreational buildings and land, including playing fields.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

9.2 In relation to other key national messages in relation to health, Fair Society, Healthy Lives⁹⁰ (‘The Marmot Review’) investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is: “overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities”.

9.3 Health Equity in England: The Marmot Review 10 Years On (2020) has been produced by the Institute of Health Equity and commissioned by the Health Foundation to mark 10 years on from the landmark study Fair Society, Healthy Lives (The Marmot Review).⁹¹

The report highlights that:

- people can expect to spend more of their lives in poor health;
- improvements to life expectancy have stalled, and declined for the poorest 10% of women;
- the health gap has grown between wealthy and deprived areas; and
- place matters – for example living in a deprived area of the North East is worse for your health than living in a similarly deprived area in London, to the extent that life expectancy is nearly five years less.

⁹⁰ The Marmot Review (2011): ‘The Marmot Review: Implications for Spatial Planning’, [online] available to access via: <https://www.nice.org.uk/media/default/About/what-we-do/NICE-guidance/NICE-guidelines/Public-health-guidelines/Additional-publications/Spatial-planning/the-marmot-review-implications-for-spatial-planning.pdf> last accessed [18/03/20]

⁹¹ Health Equity in England: The Marmot Review 10 Years on (2020) [online] available to access via <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on> last accessed [15/06/20]

- 9.4 The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.
- 9.5 The St Edmundsbury area Green Infrastructure Strategy⁹² informs land use planning and development management decision making with regard to the former District's green infrastructure. The document provided "an analysis of existing green infrastructure provision in the context of future growth and sets out a 'greenprint' (protection and enhancement of existing green infrastructure and the provision of new green infrastructure in advance of, and alongside, future development) for new and enhanced existing green infrastructure." A new Green Infrastructure Strategy for the whole district will be commissioned as evidence for the West Suffolk Local Plan.
- 9.6 The Joint Strategic Needs Assessments for Suffolk⁹³ aims to accurately assess the health needs of the local population in order to improve the physical and mental health and wellbeing of individuals and communities. The State of Suffolk Report 2019 Report⁹⁴ provides more detailed information on likely changes over the next twenty-year period.
- 9.7 The Suffolk Joint Health and Wellbeing Strategy 2016 - 2019 sets the long-term strategic framework for improving health and wellbeing in Suffolk. The refreshed report is informed by the State of Suffolk Report 2015 as a key part of the Joint Strategic Needs Assessment and is the final refresh of the original ten-year strategy (2012 - 2022). It focuses on the issues of inequalities, demographic pressures and re-designing services to meet need and enhance opportunities for prevention.
- 9.8 The Suffolk Safety, Health and Wellbeing Strategy 2019 to 2022⁹⁵ builds on the work of the previous years, describing Suffolk County Council's approach to managing safety, health and wellbeing. It sets out the priorities and plans for the Council over a three-year period, including how health and safety performance will be measured and reviewed.
- 9.9 Additionally, the following policies and aspirations within the Bury St Edmunds Vision 2031 directly correspond to the Health and Wellbeing theme:
- Policy CS2: Sustainable Development;
 - Aspiration 2: Walkable Neighbourhoods Enable Communities to Meet Their Day-To-Day Needs;
 - Aspiration 15: A Wide Range of Top Quality Cultural and Leisure Opportunities are Offered to Residents and Visitors;
 - Aspiration 17: All Residents, Visitors and Those Working in the Borough, Have Access to Good Quality Health Facilities, Information and Activities; and
 - Aspiration 19: An Ageing Population is Adequately Provided for.

⁹² St Edmundsbury Borough Council (2009) St Edmundsbury Green Infrastructure Strategy [online] available at: https://www.westsuffolk.gov.uk/planning/upload/Non-Tech-Summary_SEPT-09_low-res.pdf

⁹³ Healthy Suffolk (2019) Joint Strategic Needs Assessment (JSNA) [online] available at: <https://www.healthysuffolk.org.uk/jsna>

⁹⁴ Suffolk JSNA (2019) The State of Suffolk Report 2019 [online] available at: <https://www.healthysuffolk.org.uk/uploads/SF1160 - JSNA State of Suffolk Report 2019 20 Plus v2.0.pdf>

⁹⁵ Suffolk County Council (2019) Our Safety, Health and Wellbeing Strategy 2019/22 [online] <https://www.suffolk.gov.uk/assets/council-and-democracy/our-aims-and-transformation-programmes/SHAW-Strategy-2019-22.pdf>

Baseline Summary

Summary of Current Baseline

Public Health Profile for West Suffolk

- 9.10 The Public Health England West Suffolk Health Profile (2019)⁹⁶ gives a picture of people's health in West Suffolk. It is designed to act as a 'conversation starter', to help local government and health services understand their community's needs, so they can work together to improve people's health and reduce health inequalities.
- 9.11 The Profile identifies that life expectancy is 5.4 years lower for men and 3.9 lower for women in the most deprived areas of West Suffolk than in the least deprived areas. However, mortality rates (under 75 mortality rate from all causes, infant mortality rate, mortality rate from all cardiovascular diseases, and mortality rate from cancer) are significantly better than England averages. Given the recent administrative boundary changes however, some of the data has not been compared to England, and on this basis, the 2018 profiles are also identified to provide greater detail.
- 9.12 The 2018 health profiles for the Forest Heath and St Edmundsbury areas⁹⁷ identify that St Edmundsbury performs significantly worse than the England average for two health indicators; hospital stays for self-harm, and dementia diagnoses (aged 65+). In addition, life expectancy for both men and women is higher than the England average in the St Edmundsbury area.
- 9.13 Although the most deprived areas in Suffolk are concentrated in towns and other urban areas, highly localised rural deprivation occurs when small pockets of deprivation are masked in the data by areas of relative affluence. Very small areas of deprivation are difficult to identify and may mean people do not receive the same levels of resource and intervention that a larger and more defined area would.
- 9.14 Research into hidden needs in Suffolk highlighted the additional challenges facing rural communities in the County, such as higher domestic fuel costs, extra transport costs, and accessibility to education services and employment opportunities. Key issues affecting the health and wellbeing of rural communities include:⁹⁸
- low paid work;
 - fuel poverty;
 - high housing costs;
 - unemployment among young people;
 - social isolation, especially among older people;
 - difficulty accessing healthcare services such as GPs and dentists;
 - lack of suitable public transport options; and
 - poor broadband and mobile phone network availability.

Health indicators and deprivation

- 9.15 Census data presented in **Figure 9.1** (below) illustrates that with regards to general health, 47.2% of the population in the Neighbourhood Plan area report 'very good health', in line with figures for St Edmundsbury (47.3%), the East (47.2%) and England as a whole (47.2%). Most of the population in the Neighbourhood Plan area report having at least 'good' health (83.6%), aligning with figures for the district (83.1%), the East (82.5%) and England as a whole (81.4%).

⁹⁶ Public Health England (2019) Local Authority Health Profile 2019 [online] available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000245.html?area-name=west%20suffolk>

⁹⁷ Public Health England (2018) Local Authority Health Profiles [online] available at: <https://fingertips.phe.org.uk/profile/health-profiles>

⁹⁸ Healthy Suffolk (2019) State of Suffolk Report 2019 [online] available at: <https://www.healthysuffolk.org.uk/jsna/state-of-suffolk-report/sos19-where-we-live>

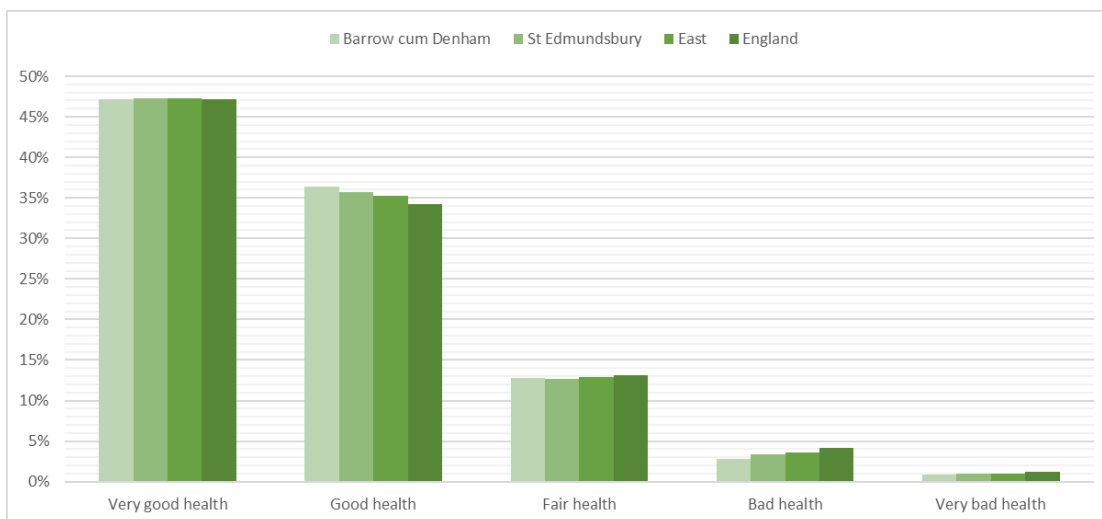


Figure 9.1 General health

Source: ONS (2011) Table KS301EW, AECOM calculations

9.16 **Figure 9.2** (below) shows that with regards to long term health, most residents in the Neighbourhood Plan area are not affected in terms of their day-to-day activities (84.6%). This is higher than the figures for St Edmundsbury (83.6%), the East (83.3%) and England as a whole (82.4%). Further, few residents’ report that their day-to-day activities are limited ‘a lot’.

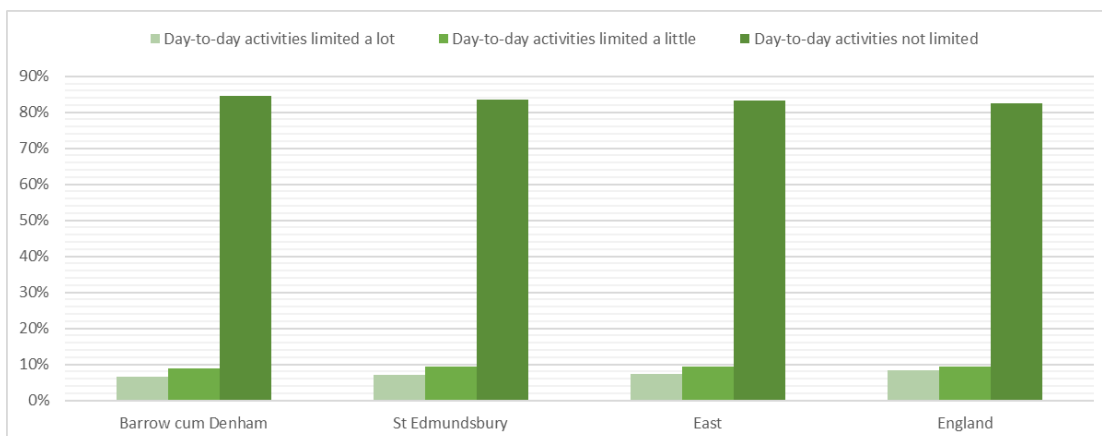


Figure 9.2 Long term health category

Source: ONS (2011) Table KS301EW, AECOM calculations

9.17 Regarding the availability of healthcare services, the Barrow Surgery is located within the Neighbourhood Plan area, at Barrow Hill. At the wider level, the Guildhall Surgery is located approximately 11km to the east of the Neighbourhood Plan area within Bury St Edmunds (~20 minute journey via car or public transport). The results of the Parish Plan completed in 2017 indicated that 61% of respondents were registered at the surgery in Barrow, with 25% registered at surgeries within Bury St Edmunds and Newmarket⁹⁹.

Summary of Future Baseline

9.18 Health and wellbeing levels within the Neighbourhood Plan area are generally good, with a high percentage of residents reporting ‘good’ or ‘very good’ health, and a low percentage of residents reporting that their activities are limited in some way.

9.19 However, an ageing population within the Neighbourhood Plan area may increase the reported cases of disability, reduce the levels of good health, and place future pressures on health

⁹⁹ Barrow cum Denham Parish Council (2017): ‘Parish Plan Part 2’, [online] available to access via: <<http://www.barrowcumdenhampc.com/wp-content/uploads/2017/02/Part-II.pdf>> last accessed [18/06/20]

services in the wider area. Similarly, ongoing cuts to community services have the potential to lead to effects on health and wellbeing to key population groups (i.e. elderly population).

- 9.20 Obesity is also seen as an increasing issue by health professionals, and one that will contribute to significant health impacts on individuals, including increasing the risk of a range of diseases, including heart disease, diabetes and some forms of cancer.
- 9.21 Poor mental health is associated with low long term life quality, a larger number of hospitalisations and deaths. Experts indicate that problems surrounding the worsening of mental health, including secondary dependencies such as alcoholism are likely to worsen over time without suitable changes within communities.

Key Sustainability Issues

- The findings of the Public Health Profile for West Suffolk (and nationally) indicate that the ageing population will continue to increase, levels of physical activity are lower than average, and the mental health of residents is a key concern.
- Rural areas within the parish are particularly sensitive to deprivation issues which impact health and wellbeing, including perceived inaccessibility and isolation.
- Most of the population in the Neighbourhood Plan area report having at least 'good' health (83.6%), aligning with figures for the district (83.1%), the East (82.5%) and England as a whole (81.4%).
- Approximately 6.5% of residents within the Neighbourhood Plan area report that their day-to-day activities are limited in some way.
- The results of the Parish Plan indicated that 61% of respondents were registered at the surgery in Barrow, with 25% registered at surgeries in Bury St Edmunds and Newmarket

What are the SEA objectives and appraisal questions for the Health and Wellbeing SEA theme?

SEA objective	Assessment Questions
Improve the health and wellbeing residents within the Neighbourhood Plan area.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Promote accessibility to a range of leisure, health and community facilities, for all age groups? • Address the key challenges identified in the JSNA and Public Health Profile for West Suffolk? • Provide and enhance the provision of community access to green infrastructure in accordance with Accessible Natural Greenspace Standards? • Protect and enhance access to nature via greenspace and footpaths? • Promote the use of healthier modes of travel? • Improve access to the countryside for recreational use? • Avoiding any negative impacts to the quality and extent of existing recreational assets, such as formal or informal footpaths?

10. Transportation

Focus of Theme

- Transportation infrastructure
- Traffic flows and congestion
- Accessibility
- Car ownership
- Travel to work

Policy Context

- 10.1 European and UK transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth.
- 10.2 Key messages from the NPPF include:
- *‘Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*
 - i. The potential impacts of development on transport networks can be addressed;*
 - ii. Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised;*
 - iii. Opportunities to promote walking, cycling and public transport use are identified and pursued;*
 - iv. The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account; and*
 - v. Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.’*
 - *‘Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.’*
- 10.3 At the local level, each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008. In this regard, the Suffolk Local Transport Plan 2011-2031¹⁰⁰ sets out a “long-term transport strategy to support economic growth, reduce the environmental impact of transport and improve health outcomes” in the region. The Plan notes the central role that transport plays in unlocking economic growth and identifies that delivering the necessary infrastructure to enable plan area residents to travel more easily by foot, bicycle or bus will help to reduce the dominance of travel by private car in the area, mitigating the impact of heavy road traffic at peak periods. There are also provisions to work with West Suffolk Council “improve access” to railway stations.
- 10.4 At the local level, several policies and aspirations within the Core Strategy (adopted 2010) for the St Edmundsbury area and the Bury St Edmunds Vision 2031 directly relate to the Transportation theme.

¹⁰⁰ Suffolk County Council (2011) Suffolk’s Local Transport Plan 2011 – 2031 [online] available at: <https://www.suffolk.gov.uk/roads-and-transport/transport-planning/transport-planning-strategy-and-plans/>

Baseline Summary

Summary of Current Baseline

Rail network

- 10.5 The main rail link serving Barrow cum Denham is the Ely-Ipswich line, which runs through the northernmost part of the Neighbourhood Plan area. Although there is no railway station within the Neighbourhood Plan area itself, Bury St Edmunds station (which is used to access services to the east) is located approximately 9km from the parish (c.15 minutes via car), and Kennett (which is used to access services to the west) is 9km and 10 minutes by car. These stations offer two services hourly to Ipswich and Cambridge, operated by Greater Anglia. Journey times are c.30 minutes to Ipswich from Bury St Edmunds and c.34 minutes to Cambridge from Kennett.
- 10.6 Higham station (now closed) was located 1km north west of the Neighbourhood Plan area boundary. Survey results of residents from the Parish Plan¹⁰¹ indicate that a large proportion of residents (41.4%) would use the station for commuting to work and recreational services if it were re-opened.

Bus network

- 10.7 With regards to the local bus network, there are nine bus stops within the Neighbourhood Plan area, most of which are within to the village centre. Two services are operational:
- **Service 312-** Bury St Edmunds- Newmarket (services up to 4 times per day)
 - **Service 985-** Bury St Edmunds- Risby (one service per day, Mon-Fri)
- 10.8 Additionally, during school term there are buses to take the children to the middle and secondary schools in Bury St Edmunds. The Parish Plan highlights the presence of various traffic calming points on the roads and a speed monitoring group, as speeding is of concern, not only with cars but also HGVs and farm machinery.
- 10.9 Results from the Parish plan also indicate that increasing the frequency of services for travel to work, particularly in the evening, would motivate residents to use bus services more regularly (35% of participants held this opinion).

Road network and congestion

- 10.10 The A14, which is part of the Strategic Road Network, runs adjacent to the northern half of the Neighbourhood Plan area. Suffolk County Council¹⁰² has identified that the A14 itself and its' junctions experience high levels of congestion. Although not located within the Neighbourhood Plan area, there is potential for excess vehicles from Coalpit lane (which intersects the A14 beyond the parish border) to increase congestion further. Beyond the A14, there are a network of smaller lanes that run through the parish, extending to each corner of the parish boundary (Colethorpe Lane, Bury Road, Barrow Road and Barrow Hill).
- 10.11 Traffic and congestion are noticeable issues in some locations. This is primarily because the village is on a route to and from the junctions on the A14, which also forms part of the Suffolk Lorry Route network¹⁰³, used frequently by freight and haulage companies' HGVs. Also notable is information provided from the Parish Council¹⁰⁴ which indicates that traffic in the lanes to the west of the Neighbourhood Plan area (i.e. Denham) is a hazard. As a result, residents tend to drive into Barrow for local facilities due to the perceived safety issues associated with walking and cycling. This then further contributes to traffic and congestion.

¹⁰¹ Barrow cum Denham Parish steering group (2014): Parish Plan (part II) [online] available at: <http://www.barrowcumdenhampc.com/wp-content/uploads/2017/02/Part-II.pdf>

¹⁰² Suffolk County Council SEA Scoping Report response for the West Suffolk Local Plan.

¹⁰³ Suffolk County Council (n.d.) Suffolk Lorry Route Network Map [online] available at: <https://www.suffolk.gov.uk/assets/Roads-and-transport/lorry-management/Lorry-Route-Map-Amended-MAY-17.pdf>

¹⁰⁴ Barrow cum Denham Parish steering group (2014): Parish Plan (part II) [online] available at: <http://www.barrowcumdenhampc.com/wp-content/uploads/2017/02/Part-II.pdf>

Cycle and footpath network

10.12 **Figure 10.1** (below) shows the extent of public rights of way (PRoWs), bridleways and footpaths within the Neighbourhood Plan area. The Parish Plan notes that footpaths and a bridleways are used mostly by dog walkers and horse riders.

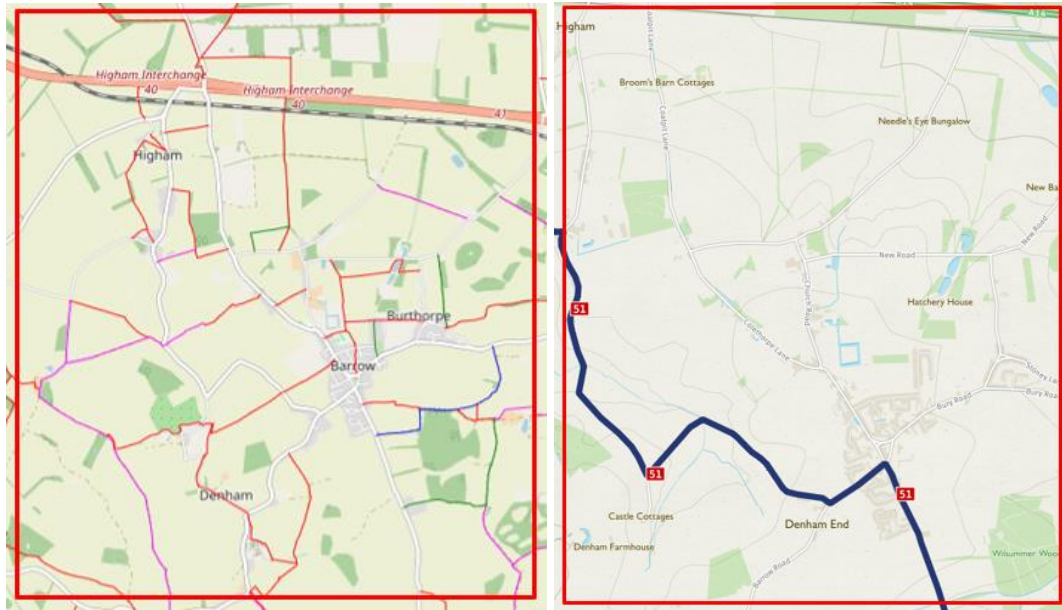


Figure 10.1: PRoW and Cycle Routes within and surrounding the Neighbourhood Plan area

10.13 Regarding cycle routes, one national cycle path runs through the northern part of the Neighbourhood Plan area: Route 51 (shown in **Figure 10.1** above). In the wider context, Route 52 links Ipswich to Bury St Edmunds and uses a section of road that used to form the Eastbound carriageway of the A14 at Haughley Bends for a traffic-free route for cyclists.

Availability of cars and vans

10.14 **Figure 10.2** (below) demonstrates that, in terms of car ownership, most residents in the Neighbourhood Plan area have access to at least one car and/or van (88.2%). This is higher than the averages for St Edmundsbury (84.1%), the East (81.5%) and England as a whole (74.0%). A higher percentage of residents also own at least two cars and/or vans (39.5%) in comparison St Edmundsbury (31.2%), the East (29.1%) and England as a whole (25.0%).

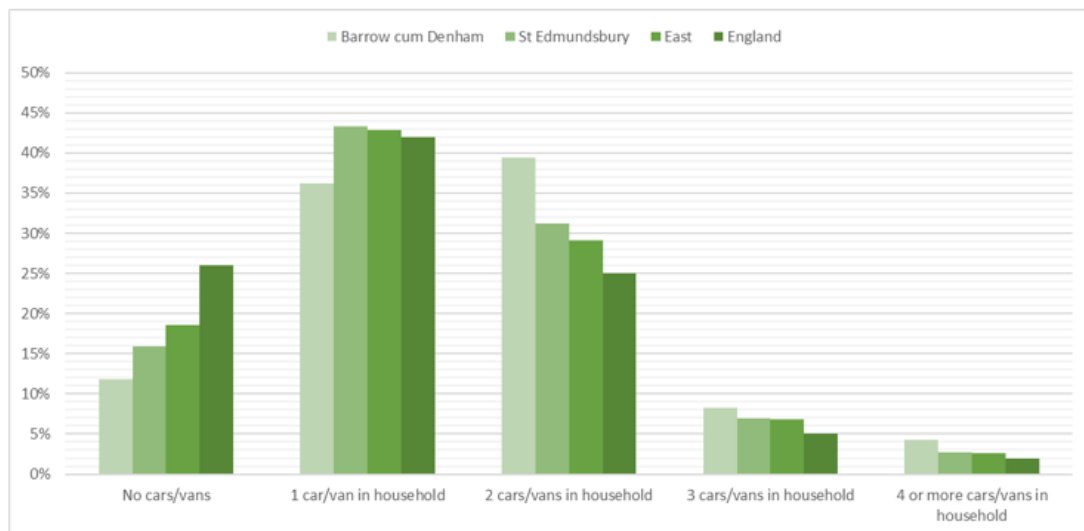


Figure 10.3 Car ownership

Source: ONS (2011) Table KS404EW, AECOM calculations

Travel to work

10.15 **Figure 10.3** (below) indicates that most residents in the Neighbourhood Plan area travel to work via car or van (50.6%), higher than figures for the district (46.1%), the East (41.4%) and England as a whole (37.0%). Approximately 5.3% of residents report working from home. A relatively low number of residents' travel to work on foot (4.8%) when compared to figures for St Edmundsbury (9.7%), the East of England (6.8%) and England as a whole (7.0%).

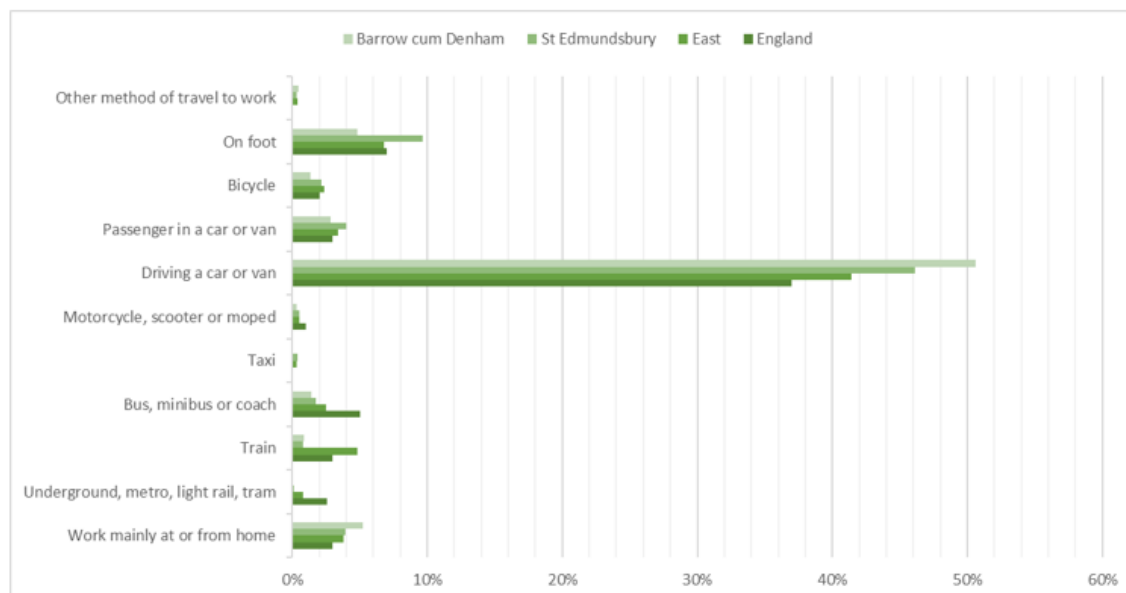


Figure 10.3 Method of travel to work (% of total)

Source: ONS (2011) Table QS701EW, AECOM calculations

Summary of Future Baseline

10.16 New development has the potential to increase traffic and cause congestion within the Neighbourhood Plan area, principally at junctions on key routes. This is likely to continue to be more pronounced during peak times (i.e. rush hours). This is particularly significant in the local context, due to the pressures from the local road networks.

10.17 However, development within the Neighbourhood Plan area has the potential to lead to some enhancements to the transport network in order to promote more sustainable modes of travel, such as the existing pedestrian and cycle network.

10.18 Additionally, there are opportunities to improve public transport networks within the Neighbourhood Plan area in order to facilitate more sustainable modes of transport whilst alleviating pressures on main road networks. Similarly, the provision of infrastructure to promote at home (i.e. remote) working is likely to positively contribute towards these aims.

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

Key Sustainability Issues

- The A14, which is part of the strategic road network, runs adjacent to the northern half of the Neighbourhood Plan area. Junctions onto the A14 suffer from congestion.
- Whilst the Neighbourhood Plan area is not directly connected to the national railway network, it is relatively accessible to Kennett for services to the west (including Cambridge) and accessible to Bury St Edmunds for services to the east (including Ipswich).
- Public transport links are variable, with two services operating infrequent routes at seven bus stops in the village and school services.

- A higher percentage of residents also own at least two cars and/or vans (39.5%) in comparison St Edmundsbury (31.2%), the East (29.1%) and England as a whole (25.0%).
- Most residents in the Neighbourhood Plan area travel to work via car or van (50.6%), higher than figures for the district (46.1%), the East of England (41.4%) and England as a whole (37.0%).
- A relatively low number of residents' travel to work on foot (4.8%) when compared to figures for St Edmundsbury (9.7%), the East of England (6.8%) and England as a whole (7.0%).

What are the SEA objectives and appraisal questions for the Transportation SEA theme?

SEA objective	Assessment Questions
Promote sustainable transport use and reduce the need to travel.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Encourage modal shift to more sustainable forms of travel? • Facilitate working from home and remote working? • Improve road safety? • Reduce the impact on residents from the road network?

11. Next Steps

Subsequent stages for the SEA process

- 11.1 The five stages of the SEA process¹⁰⁵ are identified below. Scoping (the current stage) is the second stage of the SEA process.
- i. Screening;
 - ii. Scoping;
 - iii. Assess reasonable alternatives, with a view to informing preparation of the draft plan;
 - iv. Assess the draft plan and prepare the Environmental Report with a view to informing consultation and plan finalisation;
 - v. Publish a 'statement' at the time of plan adoption in order to 'tell the story' of plan-making / SEA (and present 'measures concerning monitoring')
- 11.2 The next stage will involve appraising reasonable alternatives for the Barrow cum Denham Neighbourhood Plan. This will consider alternative policy approaches for the plan, including alternative spatial strategies. The findings of the appraisal of these alternatives will be fed back to the Barrow cum Denham Neighbourhood Plan Steering Group (the Neighbourhood Plan group) so that they might be taken into account when preparing the draft plan.
- 11.3 Once the draft ('Regulation 14 version') plan has been prepared by the Neighbourhood Plan group, it will be subjected to SEA and the Environmental Report prepared for consultation alongside it.
- 11.4 Following submission to West Suffolk Council, and consultation, the Neighbourhood Plan will be put forward for Independent Examination.

Consultation on the Scoping Report

- 11.5 Public involvement through consultation is a key element of the SEA process. At this scoping stage, the SEA Regulations require consultation with statutory consultation bodies but not full consultation with the public.
- 11.6 The statutory consultation bodies are the Environment Agency, Historic England and Natural England. The Scoping Report has been released to these three statutory consultees.
- 11.7 Consultees are invited to comment on the content of this Scoping Report, in particular the evidence base for the SEA, the identified key issues and the proposed SEA Framework.
- 11.8 The consultation period runs from Monday 22nd June 2020 to Monday 27th July 2020. Comments on the Scoping Report should be sent to:
- Ryan Putt, AECOM
- Email address: ryan.putt@aecom.com
- 11.9 All comments received on the Scoping Report will be reviewed and will influence the development of the SEA where appropriate.

¹⁰⁵ In accordance with the stages set out in the National Planning Practice Guidance

