

Strategic Environmental Assessment for the Barrow cum Denham Neighbourhood Plan

Environmental Report to accompany the submission version of
the Neighbourhood Plan

Barrow cum Denham Neighbourhood Plan Steering Group

September 2024

Quality information

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Revision History

Revision	Revision date	Details	Authorized	Name	Position
V1.0	29 th June 2022	Interim SEA Options Assessment	13 th September 2022	Z.K.	Chair, Neighbourhood Group
V2.0	11 th September 2023	Regulation 14 consultation version	12 th September 2023	R.W.	Neighbourhood Group Sub- Committee Member
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SEA Summary Note

Overview of plan making / SEA work to date

Key deliverables

Documents produced as part of the SEA process to date includes:

- The SEA Scoping Report (July 2020), which contained information about the neighbourhood area's environment and community.
- The Interim SEA Options Assessment Report (July 2022) which presented the assessment of reasonable alternatives.
- The SEA Environmental Report which accompanied Regulation 14 consultation (September 2023) which identified, described, and evaluated the likely significant effects of the Neighbourhood Plan and alternatives¹.

Purpose of this document

This Environmental Report accompanies the submission version of the Barrow cum Denham Neighbourhood Plan and considers the implications of the revisions to the Neighbourhood Plan for the SEA findings previously presented at Regulation 14 consultation (in September 2023). This includes relating to the potential for any likely significant effects that may arise as part of the revisions.

The SEA Environmental Report which was prepared for (and accompanied) the Regulation 14 version of the Barrow cum Denham Neighbourhood Plan has been revisited to reflect the revisions made to the Neighbourhood Plan policies. The updated document is presented below. Where appropriate, the SEA findings have been updated to reflect the revisions to the Neighbourhood Plan policies (as discussed below). A proportionate approach has been undertaken to reflect the scope of the revisions.

Appraising the updates to the Neighbourhood Plan

Methodology

The updates to the Barrow cum Denham Neighbourhood Plan have been screened for likely significant effects. The purpose of this screening exercise is to establish whether the proposed updates are likely to lead to significant effects in relation to the findings previously presented in the Regulation 14 version of the Environmental Report, which should then be appraised in more detail.

The focus of the screening is on the proposed updates to the Barrow cum Denham Neighbourhood Plan; however, explicit consideration is also given to the effects of the Barrow cum Denham Neighbourhood Plan as updated (i.e., the cumulative effects of the updates and the rest of the Barrow cum Denham Neighbourhood Plan as submitted).

¹ The alternatives assessment presented in the Interim SEA Options Assessment Report was updated as appropriate at this stage of plan making to reflect comments received from plan makers on the preferred approach for the Neighbourhood Plan.

Findings of the screening exercise

The following table presents the findings of the screening of the updates to the Barrow cum Denham Neighbourhood Plan.

Table SN1: Screening the updates made to the Neighbourhood Plan

Update (Policy ref.)	Focus (changes in relation to...)	Screened in?	Rationale
Policy BCD2	<p>Housing number reduction from 170 homes (within the Regulation 14 version) to a maximum of 165 homes (within the submission version).</p> <p>This aligns with the updated indicative capacity outlined within the West Suffolk Local Plan Submission Draft (2024), which was previously 170 homes in West Suffolk's Preferred Options document (2022).</p>	No	<p>The changes do not constitute a change in the overall aim and focus of the wider Neighbourhood Plan policies and do not impact on the overall spatial strategy. This is given that the proposed site allocations have remained the same.</p> <p>As the total number of homes to be delivered within the submission version of the Neighbourhood Plan is slightly fewer than the total within the Regulation 14 version, no further additional effects are anticipated which should be considered in more detail.</p> <p>It should be noted that it has not been possible to take account of the Government's proposed reforms to the NPPF and new proposed standard method for calculating housing need within this report. The consultation runs to 24th September 2024.</p>
Policy BCD5	Change to the name of the policy from 'Development and High-Quality Design' to 'New Development and High-Quality Design'.	No	The revisions do not comprise any significant changes to the overall aim and focus of the policy.

Screening conclusions

The SEA Regulations require the SEA process to identify, describe and evaluate the likely significant effects of the Barrow cum Denham Neighbourhood Plan and alternatives.

The screening of the updates has concluded that **the submission version of the Barrow cum Denham Neighbourhood Plan would not have any additional significant effects to those presented in the SEA Environmental Report which accompanied the Regulation 14 consultation on the Neighbourhood Plan.**

In light of the above, in association with the requirements of the SEA Regulations, further detailed assessment work is not required to explore the implications of the updates to the Barrow cum Denham Neighbourhood Plan.

Summary of the preferred approach for the Neighbourhood Plan

The preferred approach for the Neighbourhood Plan has been informed by the various surveys and evidence base documents prepared to support the Neighbourhood Plan (to date), responses from community consultation events, and the SEA findings. Further details on the preferred approach is presented in the Non-Technical Summary and the main body of the Environmental Report (presented below).

The Neighbourhood Group state the following²:

“As part of the basis of our strategic site selection decision we primarily gave weight to the St Edmundsbury Council (now West Suffolk Council) Rural vision 2031, Section 20: Paragraph 4, which states that the close proximity of the small settlements of Denham and Burthorpe should be protected from coalescence with Barrow.

“Our chosen strategic site option at Barrow Hill, as set out in Policy BCD2 of the emerging Neighbourhood Plan, ensures that this will not occur. Our primary objectives in selecting the above combination of sites from the AECOM Report are set out below:

- *No risk of coalescence with neighbouring settlements and protection of existing green spaces.*
- *No conflict with Historic buildings or monuments.*
- *A cohesive relationship with existing new development in an area of the village which has been undergoing recent transition.*
- *Access points not on the main thoroughfare to Bury.*
- *Good visibility when exiting the sites.*

“Site BD8 has been allocated for employment purposes, which could accommodate a Community Care home.

“The landowners of these sites are local to our Parish, and we felt that we would be able to secure greater benefit for the whole community, in addition to S106 monies (subsequent to our decision on site selection we have secured an agreement with the landowners for a Community Fund to be set up).

“The Parish Council notes that West Suffolk has an emerging Local Plan, which contains alternative strategic site options for the growth of Barrow. For the avoidance of doubt, the Parish Council also gave due consideration to these sites but rejected them in favour of the selected amalgam of sites at Barrow Hill. The rationale for discounting the sites which now form part of the emerging West Suffolk Local Plan can therefore be summarised as follows:

*“**BD9** selected by WSC to accommodate 15 dwellings (originally 20). Our reasons for not selecting this site are as follows:*

- *Erodes green space between border of Barrow and Denham risking coalescence.*
- *Proximity to Listed buildings*
- *Access to site at a point where the road narrows and on a bend.*
- *Poor visibility when exiting the site, considered a driving hazard.*

*“**BD13** selected by WSC to accommodate 150 dwellings. Our reasons for not selecting this site as follows:*

- *When originally assessed was on the basis of accommodating 77 dwellings which would have been on the western side only.*

² Barrow cum Denham Parish Council (August 2024): ‘Reasons for selecting the preferred approach – Note to AECOM’

- *Coalescence with Burthorpe, green space between settlements would be eroded.*
- *Concerns regarding access on to the main Bury Road, as a potential hazard.*
- *Proximity to listed buildings.”*

Non-Technical Summary

What is Strategic Environmental Assessment?

A Strategic Environmental Assessment (SEA) has been undertaken to inform the Barrow cum Denham Neighbourhood Plan. This process is required by the SEA Regulations.

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

What is the Barrow cum Denham Neighbourhood Plan?

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

Purpose of this Environmental Report

This Environmental Report, which accompanies the submission version of the Barrow cum Denham Neighbourhood Plan, is the latest document to be produced as part of the SEA process.

The purpose of this Environmental Report is to:

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

The Environmental Report contains:

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

Consideration of reasonable alternatives for the Barrow cum Denham Neighbourhood Plan

Housing numbers to deliver through the Neighbourhood Plan

A Housing Needs Assessment (HNA) was completed in 2019 to contribute to the evidence base for the Neighbourhood Plan³. In terms of housing numbers, the HNA suggested a target of 154 dwellings for the neighbourhood area. At the time of completing the HNA, engagement with West Suffolk Council suggested a higher target of 225 dwellings. Given a total of 77 dwellings had already been secured through existing completions and commitments within the neighbourhood area, it was anticipated that a residual target of between 77 dwellings (based on the conclusions of the HNA) and 148 dwellings (based on the engagement with West Suffolk) would be delivered during the plan period.

Since the completion of the HNA, the emerging West Suffolk Local Plan has continued to develop, including discussions between West Suffolk Council and Barrow cum Denham Parish Council regarding housing numbers. As reflected in 'Part Three: Site Allocations' within the West Suffolk Local Plan Preferred Options consultation document⁴, West Suffolk Council provides an indicative target of 170 new dwellings for the neighbourhood area⁵.

Consideration of potential site options

In recognition of the above, Barrow cum Denham Parish Council completed a local call for sites in October 2020, along with a consideration of sites which were included in West Suffolk's Issues and Options Site Submission Review⁶.

The Neighbourhood Plan Steering Group (with support from an independent planning consultancy) completed assessments of the various sites⁷ in the parish in terms of their suitability, availability, and achievability for the purposes of a potential Neighbourhood Plan allocation.

A total of 15 sites were assessed. Following this process, eight sites were given a 'red' rating (i.e., unsuitable for development). Reasons listed within the site assessment report include access issues, relative distance from Barrow village centre (encroaching into the open countryside, contrary to local policy provisions), potential coalescence between settlements, concerns regarding impacts to the setting of designated heritage assets, and adverse impacts to the character of the built form within the village.

A total of seven sites were identified as appropriate locations to consider as possible allocations for the Barrow cum Denham Neighbourhood Plan. One site was given a 'green' rating (i.e., suitable without constraints) and six sites were given an 'amber' rating (i.e., potentially suitable, with some minor constraints). The sites are listed in **Table NTS1** below.

³ The HNA accompanies the evidence base for the Neighbourhood Plan

⁴ West Suffolk Council (2022): 'West Suffolk Local Plan Preferred Options – Part Three: Site Allocations', [online] available to access [here](#)

⁵ It is recognised that the West Suffolk Local Plan Submission Draft (2024) provides an updated indicative capacity of 165 homes for the neighbourhood area, slightly fewer than the number proposed within the Preferred Options document.

⁶ Forming part of an issues and options consultation which was completed between October and December 2020 to inform the development of the emerging West Suffolk Local Plan.

⁷ The initial site assessment report contributes to the evidence base for the Barrow cum Denham Neighbourhood Plan and accompanies the evidence base for the Neighbourhood Plan.

Table NTS1: Sites taken forward for further consideration through the SEA

SEA ID	Name of site, address	Size (Ha) ⁸
BD1	Land south of Stoney Lane	0.39
BD6	Land east of Barrow Hill	8.60
BD8	Land south of Barrow Forge	1.41
BD9	Land south of Denham Lane	0.66
BD10	Old Bakehouse Site	0.13
BD12	Land west of Barrow Hill	3.50
BD13	Land south of Bury Road	10.0

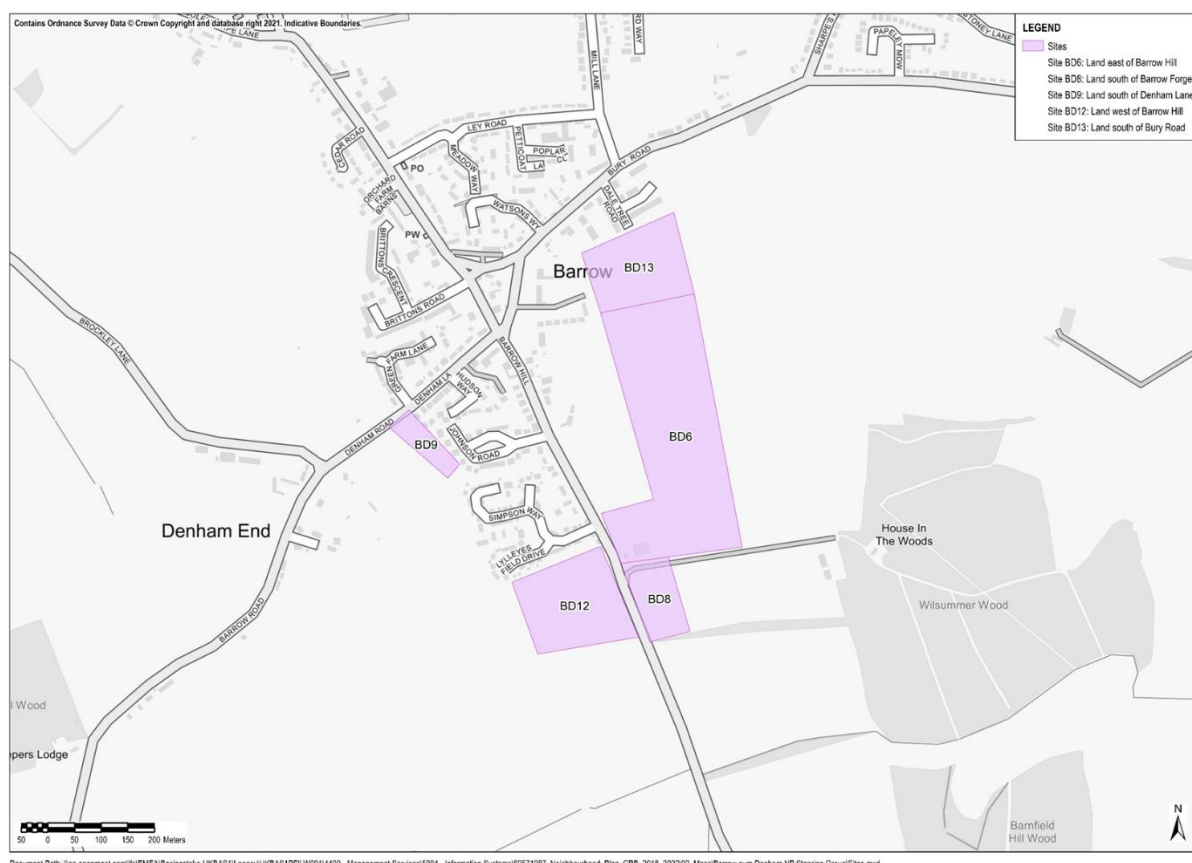
With further respect to the seven sites, Site BD10 has since been delivered (an infill site providing one dwelling). Site BD1 has also been excluded at this stage in light of:

- The relatively small size of the site, and the availability of alternative larger sites which can positively contribute to local housing requirements and potentially unlock a greater percentage of affordable dwellings.
- Further reflection on some of the site constraints, with access identified as a key concern; and
- The location of the site within Burthorpe, to the west of the main settlement of Barrow village (i.e., the preferred location of growth as per local policy provisions, with Barrow identified as a 'key service centre').

Nevertheless, the Neighbourhood Plan Steering Group recognises the potential of Site BD1 (reflecting the findings of the site assessment process) and acknowledges that the site may come forward during the lifetime of the plan period (just not specifically as a Neighbourhood Plan allocation).

The remaining five 'amber' sites are the focus for the SEA. The sites are located within or adjacent to Barrow village and shown in the figure below.

⁸ Represents total site size and not necessarily the total developable area.



Spatial strategy options consider through the SEA

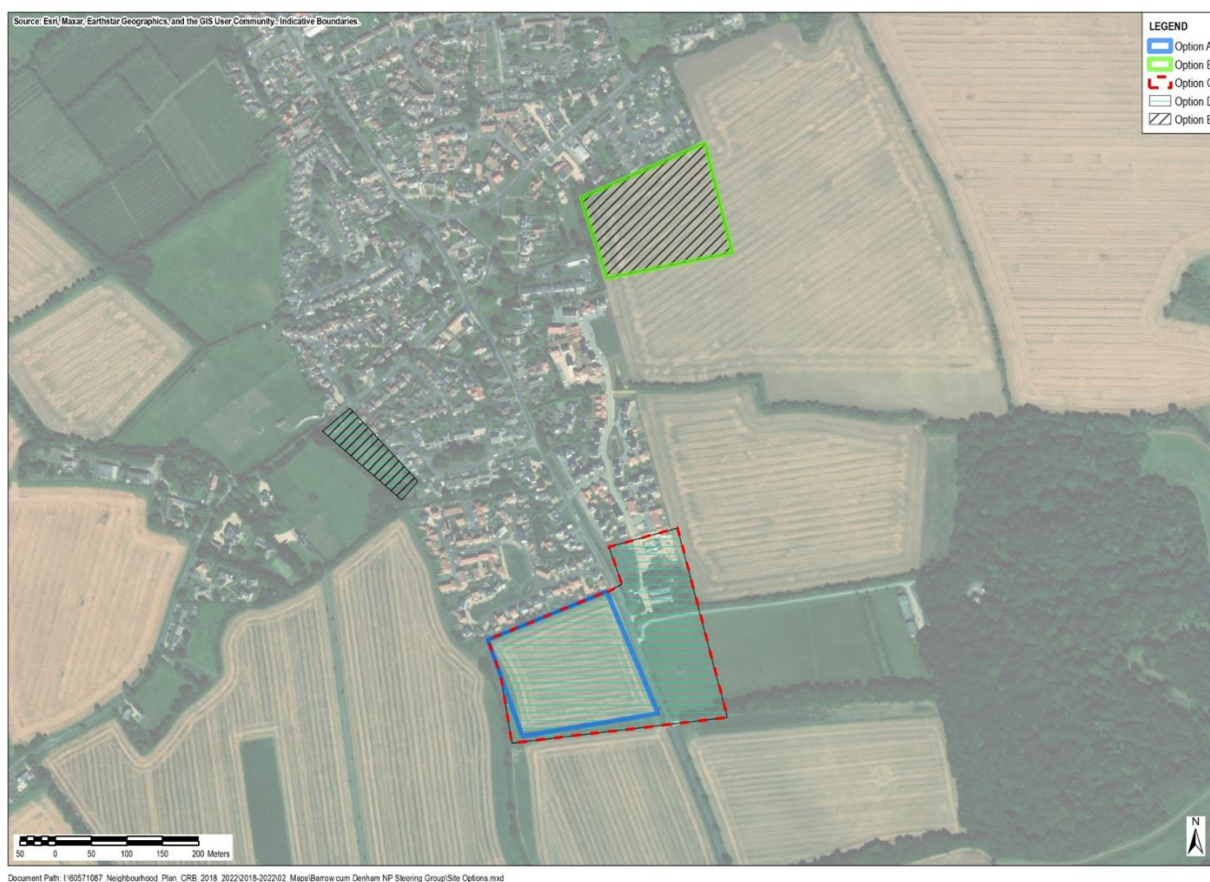
To support the choice of a development strategy for the Barrow cum Denham Neighbourhood Plan, the SEA process has assessed a number of spatial strategy options as reasonable alternatives. These spatial strategy options comprise packages of the sites identified above, which are summarised below⁹.

- **Option A:** Delivery of new housing through an allocation at Site BD12.
- **Option B:** Delivery of new housing through an allocation at Site BD13.
- **Option C:** Delivery of new housing through allocations at Site BD6, Site BD8 and Site BD12. Specifically, the sections of the site which, when combined, create a neat curtilage to the southern part of the village.
- **Option D:** Delivery of new housing through allocations at Site BD6, Site BD8, Site BD9 and Site BD12. All four sites are identified as having direct access to the existing road network.
- **Option E:** Delivery of new housing through allocations at Site BD9 and Site BD13. These sites are West Suffolk Council's preferred site options¹⁰.

⁹ The full areas of the sites (as put forward through the 'call for sites', and West Suffolk's Issues and Options Site Submission Review) have been considered within the site assessment process. For the purposes of the SEA, the areas of the sites which have been included within the options appraisal reflect the locations which are considered the most suitable areas to take forward for new development (i.e., the least constrained parts of the sites). This reflects the conclusions of the site assessment process, and community preferences with regards to the potential location of new development within the neighbourhood area.

¹⁰ Within the Preferred Options consultation document (and within the West Suffolk Local Plan Submission Draft), the area proposed for Site BD13 reflects the total area of the site (as considered within the site assessment process). It is recognised that the area of the site proposed through the SEA options appraisal (which is a reduced area, reflecting the site assessment conclusions) might not be large enough to meet the housing target of 170 dwellings. Therefore, for some of the options, additional sections of the site(s) (i.e., those identified as the more constrained areas reflecting the site assessment conclusions) may also need to come forward to meet the housing target.

The map below visually presents these five options.



Summary of appraisal findings

Table 4.2 to Table 4.9 within the main body of the Environmental Report present the full assessment findings of the appraisal of the five spatial strategy options for each of the SEA themes. A summary of the appraisal findings is presented below.

Table NTS2: Rankings of sustainability performance against each SEA theme

SEA theme	Rank of preference				
	Option A	Option B	Option C	Option D	Option E
Biodiversity and Geodiversity	=3	=1	=3	=3	=1
Climate Change	=3	=1	=3	=3	=1
Landscape	2	4	1	3	5
Historic Environment	=1	=4	=1	=1	=4
Land, Soil and Water Resources	=3	=3	1	2	5
Population and Community	3	=1	=4	=4	=1
Health and Wellbeing	3	=1	=4	=4	=1
Transportation	=3	=1	=3	=3	=1

In conclusion, all options have the potential to impact upon the integrity of internationally and nationally designated sites for biodiversity, as the number of new dwellings to come forward (totalling up to 170 dwellings) may exceed SSSI IRZ thresholds. However, given the relative distance of the Site BD9 and Site BD13 from Wilsummer Wood CWS, Option B and Option E are somewhat more favourable options in relation to the biodiversity and geodiversity SEA theme.

While all the sites are adjacent to the existing built-up areas of Barrow village, Site BD13 is the closest to village amenities and (along with Site BD9) benefits from pedestrian connectivity to these amenities. Site BD6, Site BD8 and Site BD12 are located to the south of the village, at further distance from the centre, and do not currently benefit from pedestrian access. In this respect, Option B and Option E are more favourable in relation to the climate change, population and community, health and wellbeing, and transportation SEA themes. If Option A, Option C, or Option D are taken forward, proposals should seek to improve connections to the village centre and maximise opportunities for active travel.

From a landscape character perspective, Option C is likely to perform most favourably given the potential to create a neat edge to the south of Barrow village. Comparatively, Option B and Option E are the least favourable options considering the potential coalescence concerns and departure from the existing built form.

With respect to the historic environment SEA theme, it is not anticipated that there would be any significant impacts to the integrity or setting of any nationally designated heritage assets as associated with Option A, Option C, and Option D. Consultation with Historic England is encouraged to ensure that development proposals at Site BD13 (as proposed through Option B and Option E) seek to implement sensitive design techniques which respect and enhance the setting of the two listed buildings within proximity to the site. Regarding non-designated heritage assets, applications for new development within the neighbourhood area (particularly associated with Option A, Option C, and Option D) should ensure that archaeological finds (including details of their significance) are appropriately recorded in line with best practice guidance.

As the proposed site allocations comprise areas of greenfield land (identified as Grade 2 land within the predictive ALC assessment), all options have the potential to result in the permanent loss of productive agricultural land which cannot be mitigated. However, as the north eastern section of the site area proposed through Option C comprises a small area of previously developed land, this option is slightly more favourable with regards to the land, soil, and water resources SEA theme.

The development of larger sites increases the viability of providing housing of an appropriate type and tenure (including affordable housing) to meet local needs. Larger sites also have the potential to be sensitively and creatively designed to incorporate green and blue infrastructure enhancements at a scale which can positively contribute to local networks, linking areas together and positively contributing to biodiversity and landscape objectives (with indirect benefits to health and wellbeing). In this respect, all options (which encompass sites with relatively large areas) have the potential to deliver wider benefits for the community. However, this might be challenging for the areas proposed through Option C and Option D (Site BD6, Site BD8, and Site BD12) given the land ownership issues at these locations, and the potential difficulties associated with bringing forward a coordinated and master planned design across multiple site areas. Additionally, a section of Site BD6 is provisionally allocated for employment uses within the West Suffolk Local

Plan Preferred Options consultation document. This could potentially reduce the capacity for housing, contributing less to local targets.

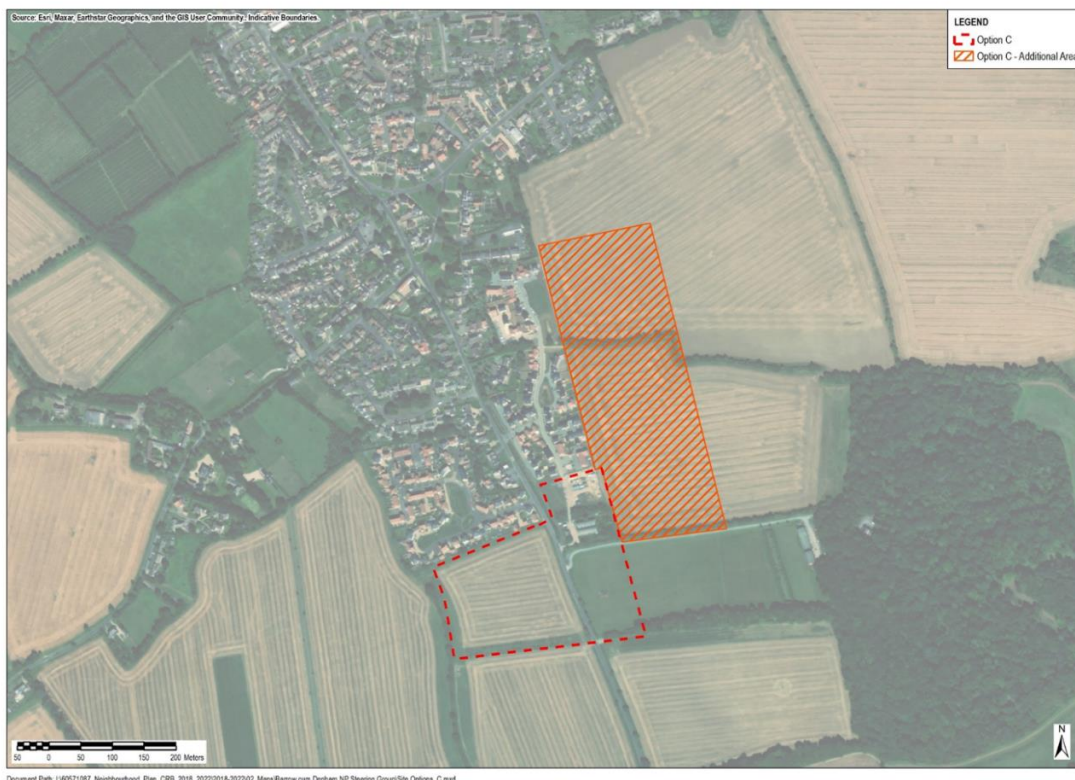
The preferred approach for the Neighbourhood Plan

A maximum of 165 homes¹¹ is to be met through the combination of sites proposed through **Option C** (i.e., Site BD6, Site BD8, and Site BD12). The preferred approach has been informed by the various surveys and evidence base documents prepared to support the Neighbourhood Plan (to date), responses from community consultation events, and the SEA findings. The Neighbourhood Plan states:

“The mixed-use site allocation is located in an area which has already successfully accommodated new housing growth in the recent past and which can deliver additional sustainable growth. Larger scale development to the South of Barrow will ensure that the settlement identity and character of nearby Denham and Burthorpe will also be protected from future erosion and coalescence.

“The identified BCD2 site allocation is characterised as a transitional, modern area of the village, which is less sensitive to future development change than other, more constrained, edge of settlement areas, closer to the historic village core and its sensitive heritage assets. Notwithstanding this relationship, all existing services within Barrow will be fully accessible to the Site allocated under Policy BD2, via sustainable travel modes.”

Further discussions between the neighbourhood group, the Parish Council, and site promoters have taken place with respect to the design of the preferred site allocation. In this context, the boundary has been extended to encompass the full area of Site BD6 (as shown in the figure below).



¹¹ It is recognised that the West Suffolk Local Plan Submission Draft (2024) provides an updated indicative capacity of 165 homes for the neighbourhood area, slightly fewer than the indicative capacity of 170 which was proposed within the Preferred Options document. The submission version of the Neighbourhood Plan seeks to align with the updated indicative total.

The key constraints to development within the additional area primarily link to the landscape and heritage sensitivities. The Site Options and Assessment (SOA) findings confirm the following:

- The site is open to the north and east, however the site contains limited landscape features of value and could be considered of medium sensitivity in terms of visual amenity due to intervisibility with the surrounding landscape. However, development of the site would require a defensible boundary and landscape-buffer to the east.
- The site is flat and part of wider agricultural fields to the east of the village and surrounded on three sides by open fields with views across open countryside.
- There are no significant constraints to development. However, further assessment would be required to understand other environmental issues such as archaeological finding and recreational pressure.

With respect to the above, the Neighbourhood Plan recommends that the site is brought forward via a comprehensive concept diagram (see Figure 4 within the Neighbourhood Plan), working collaboratively with site promoters to ensure that the scheme:

- Appropriately addresses any constraints to development.
- Delivers key community aspirations through the design of new development areas (e.g., the provision of new community assets and infrastructure); and
- Positively contributes towards the wider visions and objectives for the neighbourhood area.

The site-specific policy for the proposed site allocation within the Barrow cum Denham Neighbourhood Plan (see Policy BCD2) contains further detail with respect to design and mitigation considerations which aim to address any potential constraints to development.

Appraisal of the submission version of the Barrow cum Denham Neighbourhood Plan

The submission version of the Barrow cum Denham Neighbourhood Plan presents 12 planning policies for guiding development in the neighbourhood area. These were developed following extensive community consultation and evidence gathering.

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

- Biodiversity and Geodiversity.
- Climate Change.
- Landscape.
- Historic Environment.
- Land, Soil, and Water Resources.

- Population and Community.
- Health and Wellbeing; and
- Transportation.

In the context of the above, the assessment has concluded that the submission version of the Neighbourhood Plan is likely to have **long-term positive effects in relation to the ‘Population and Community’ and ‘Health and Wellbeing’ SEA themes**. This primarily links to the Neighbourhood Plan’s support for high-quality development proposals which would deliver suitable and appropriate housing for the local community (via a range of types and tenures), safeguard and improve the availability of services, facilities and amenities, and support opportunities for local employment. These policy provisions will support social inclusion, and community and economic vitality. The Neighbourhood Plan is also likely to facilitate improvements to the public realm (including through green infrastructure enhancements) and encourage healthy outdoor recreation and relaxation. These policy provisions will support the quality of life of residents.

The Neighbourhood Plan will also deliver **long-term positive effects in relation to the ‘Landscape’ and ‘Historic Environment’ SEA themes**. These benefits largely relate to the Neighbourhood Plan’s emphasis on protecting and enhancing the relationship between natural and built environment, protecting important landscape and heritage features, and facilitating improvements to the quality of the public realm. While the proposed site allocation is sensitive from a landscape and heritage perspective, it is considered that the neighbourhood plan policies provide a detailed overview of the proposed mitigation and enhancement measures which positively address the sensitivities. Nevertheless, **the SEA recommends** that new development proposals within the neighbourhood area should ensure that any archaeological finds (including details of their significance) are appropriately recorded in line with best practice guidance.

Additionally, **the Neighbourhood Plan will bring minor long-term positive effects in relation to the ‘Biodiversity and Geodiversity’ SEA theme** by encouraging proposals to protect existing and establish new habitats, enhance ecological networks (including through green infrastructure enhancements), and deliver net gains. Providing any recommendations within the HRA are incorporated into the submission version of the Neighbourhood Plan, it is anticipated that there would be no adverse effects to the integrity of these sites, either alone or in-combination with other plans and projects.

Uncertain effects are considered likely in respect to climate change and flood risk. The Neighbourhood Plan has the potential to lead to positive effects through supporting proposals that promote the inclusion of low carbon technologies and the use of local and traditional building materials, encourage sustainable and active travel, and proactively respond to the potential impacts of climate change through the implementation of appropriate drainage solutions. However, it is recognised that new development would lead to inevitable increases in greenhouse gas emissions due to an increase in the built footprint of the neighbourhood area.

The plan also makes provision for transportation; encouraging proposals which would deliver new and enhanced public rights of way and improvements to the local transport network. This will allow for safe and active transportation around the neighbourhood area and better access to locations further afield. As such, **minor**

long term positive effects are anticipated for transportation through the implementation of the Neighbourhood Plan.

It is expected the Neighbourhood Plan will bring forward **minor long term positive effects for land, soil, and water resources** in the neighbourhood area by incorporating several provisions will help support the capacity of the landscape to regulate soil and water quality. Whilst the proposed site allocation will potentially result in the permanent loss of areas of productive agricultural land, opportunities to meet housing needs purely through the redevelopment of brownfield land within the neighbourhood area are relatively limited.

Monitoring

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

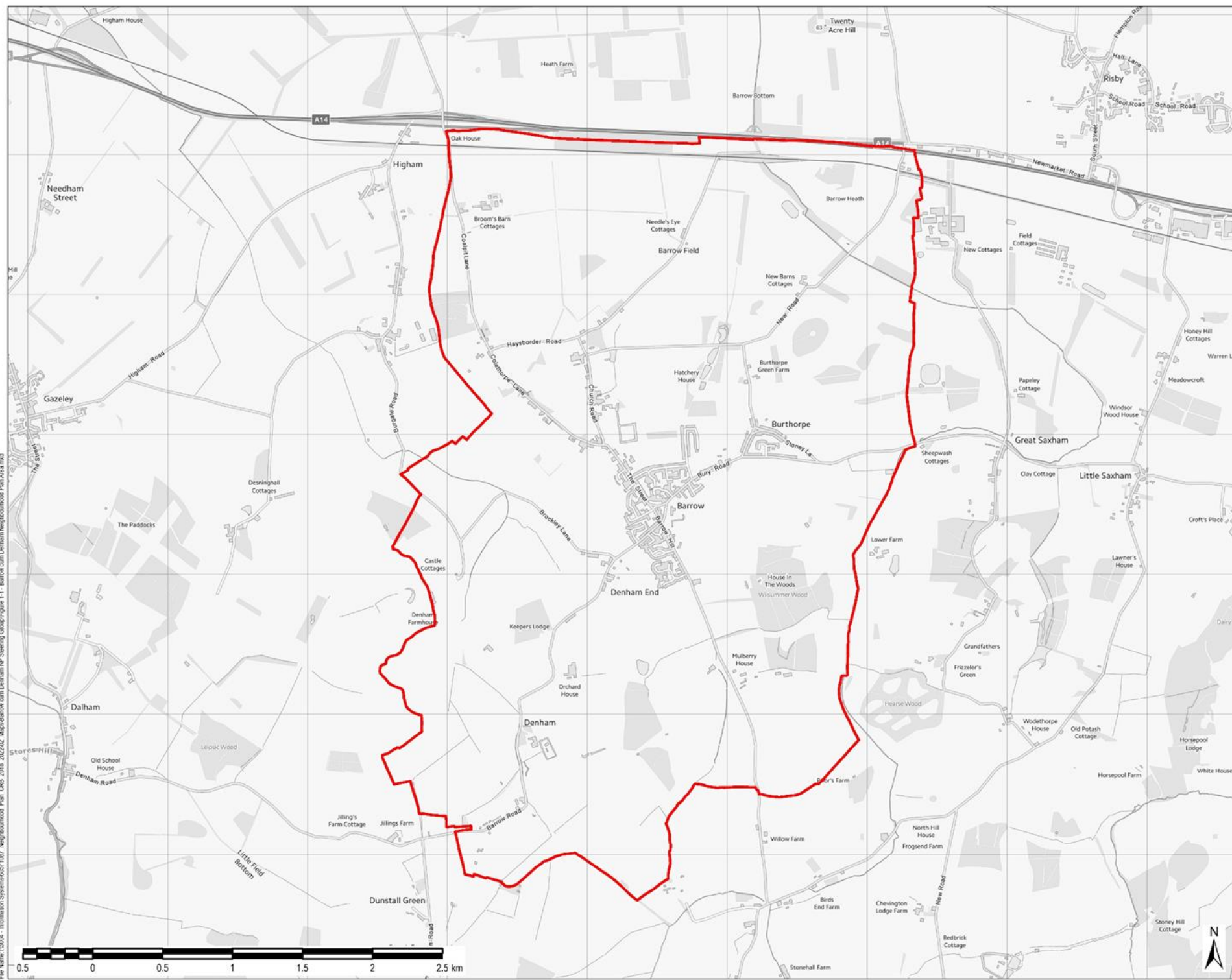
It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by West Suffolk Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the Neighbourhood Plan that would warrant more stringent monitoring over and above that already undertaken by West Suffolk Council.

Next steps

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

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

File Name: I:\5004 - Information Systems\60571087 - Neighbourhood Plan - O&B 2018 - 2022\2022 - Maps\Barrow cum Denham NP Steering Group\Figure 1.1 - Barrow cum Denham Neighbourhood Plan Area.mxd



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

Drawn CN	Checked JW	Approved HP	Date 04/05/2020
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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 2024. Key information relating to the Barrow cum Denham Neighbourhood Plan is presented in **Table 1.1** below.

Table 1.1: Key facts relating to the 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 area.</p>
Timescale	To 2041
Area covered by the plan	The neighbourhood 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 area.
Plan contact point	Turley Consultancy: steven.kosky@turley.co.uk

SEA screening for the Barrow cum Denham Neighbourhood Plan

- 1.4 A Neighbourhood Plan requires SEA where it is likely to have significant environmental effects. In this respect, Neighbourhood Plans are more likely to be screened in as requiring an SEA if both the following apply:
- 1) the Neighbourhood Plan is being prepared within a neighbourhood area with significant environmental constraints, such as, for example, Special Areas of Conservation, Sites of Special Scientific Interest, or large concentrations of heritage assets; and
 - 2) the Neighbourhood Plan is likely to allocate sites for development.¹²
- 1.5 The Barrow cum Denham Neighbourhood Plan has been screened in by West Suffolk Council as requiring a Strategic Environmental Assessment (SEA). 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).
- 1.6 In light of this outcome, an SEA process is being undertaken to meet the specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations)¹³.

SEA explained

- 1.7 SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts and maximising the potential for positive effects. Through this approach, the SEA for the Barrow cum Denham Neighbourhood Plan seeks to maximise the emerging plan's contribution to sustainable development.
- 1.8 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.
 - 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.
- 1.9 This 'Environmental Report' is concerned with item 'ii' above.

¹² DLUHC (February 2022): Chief Planner's Newsletter, February 2022 "Strategic Environmental Assessment for Neighbourhood Plans: Timely and effective screening" accessible [here](#)

¹³ UK Government (2004) 'The Environmental Assessment of Plans and Programmes Regulations 2004' can be accessed [here](#).

Structure of this Environmental Report

1.9 This document is the SEA Environmental Report for the Barrow cum Denham Neighbourhood Plan and hence needs to answer all four of the questions listed below with a view to providing the information required by the SEA Regulations. Each of the four questions is answered in turn within this report, as follows:

Table 1.2: Questions that must be answered by the SEA Environmental Report to meet the regulatory¹⁴ requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ¹⁵
What is the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents and main objectives of the plan.
What is the sustainability 'context'?	<ul style="list-style-type: none"> Relationship with other relevant plans and programmes. The relevant environmental protection objectives, established at international or national level. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What's the scope of the SEA?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. The environmental characteristics of areas likely to be significantly affected. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What is the sustainability 'baseline'?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. The environmental characteristics of areas likely to be significantly affected. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What are the key issues and objectives?	<ul style="list-style-type: none"> Key problems/issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment.
What has plan-making/SEA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with. The likely significant effects associated with alternatives. Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.
What are the assessment findings at this stage?	<ul style="list-style-type: none"> The likely significant effects associated with the submission version of the plan. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the submission version of the plan.
What happens next?	<ul style="list-style-type: none"> The next steps for the plan making / SEA process.

¹⁴ Environmental Assessment of Plans and Programmes Regulations 2004

¹⁵ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

2. Local Plan context and vision for the Neighbourhood Plan

Local Plan context for the Neighbourhood Plan

- 2.1 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 documents¹⁶:
- 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).
- 2.2 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).
- 2.3 Following the amalgamation of St Edmundsbury and Forest Heath Councils to West Suffolk Council, a Local Plan Review was deemed necessary. Once adopted, the emerging 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. A preferred options consultation¹⁷ on the emerging Local Plan was undertaken in May 2022. The latest Local Development Scheme document¹⁸ highlights that the pre-submission (Regulation 19) consultation on the emerging Local Plan is expected in January 2024. In May 2024, the emerging Local Plan was submitted to the Secretary of State for independent examination¹⁹.
- 2.4 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

¹⁶ West Suffolk Council (2020): 'West Suffolk Local Plan (consisting of the former Forest Heath and St Edmundsbury areas)' can be accessed [here](#).

¹⁷ West Suffolk Council (2022): 'Preferred Options Consultation', can be accessed [here](#)

¹⁸ West Suffolk Council (2023): 'Local Development Scheme June 2023 (update) – West Suffolk Local Plan programme' can be accessed [here](#)

¹⁹ West Suffolk Council (2024): 'West Suffolk Local Plan Examination in Public', can be accessed [here](#)

development in West Suffolk, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.

Vision, aims, and objectives for the Neighbourhood Plan

2.5 The vision for the Barrow cum Denham Neighbourhood Plan captures the community's views and aspirations for the neighbourhood area as expressed through the neighbourhood planning process. It forms the basis on which the neighbourhood objectives and proposed policies have been formulated.

2.6 The vision is as follows:

“The Parishes of Barrow and Denham have their own strong sense of individual local identity and community values, and through the production of this Neighbourhood Plan, seeks to set out a clear pathway into the future to strengthen and secure the long-term integrity of the Neighbourhood Plan Area.”

2.7 The vision is accompanied by a number of objectives which are grouped into the following six inter-related topics:

- The built and natural environment.
- Housing supply and sustainable new homes.
- New and existing community facilities.
- Support for local business and employment.
- Health and wellbeing; and
- Active transport and accessibility.

3. What is the scope of the SEA?

Summary of SEA scoping

- 3.1 The SEA Regulations require that: “When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”.
- 3.2 In England, the consultation bodies are Natural England, the Environment Agency, and Historic England.²⁰ These authorities were consulted on the scope of the SEA in July 2020.
- 3.3 The purpose of scoping was to outline the ‘scope’ of the SEA through setting out the following information:
- A context review of the key environmental and sustainability objectives of national, regional, and local plans and strategies relevant to the Barrow cum Denham Neighbourhood Plan.
 - Baseline data against which the Neighbourhood Plan can be assessed.
 - The key sustainability issues for the Neighbourhood Plan; and
 - An ‘SEA Framework’ of objectives against which the Barrow cum Denham Neighbourhood Plan can be assessed.
- 3.4 The full SEA Scoping Report is available on the Neighbourhood Plan website and accompanies the evidence base for the Neighbourhood Plan. Responses received on the Scoping Report, and how they were addressed, have been summarised below.

Table 3.1: Consultation responses received on the SEA Scoping Report

Consultation response	How the response was considered and addressed
Historic England <i>Historic Places Adviser (response received on 27th July 2020)</i>	
We are pleased to note the reference to a number of Historic England Advice documents, including Advice Note 8: <i>Sustainability Appraisal and Strategic Environmental Assessment</i> . As you are aware, this advice sets out the historic environment factors which need to be considered during the Strategic Environmental Assessment or Sustainability Appraisal process, and our recommendations for information you should include.	Comment noted.

²⁰ In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme.’

Consultation response	How the response was considered and addressed
<p>We note that this neighbourhood plan has been screened in for SEA on the basis that it will be allocating land for the construction of at least 154, and possibly up to 238 residential units within the neighbourhood area. We agree that there is therefore the likelihood for the neighbourhood plan to cause significant effects on the historic environment.</p>	<p>Comment noted. Potential impacts to the historic environment associated with the policies and proposals within the Neighbourhood Plan is presented within Chapter 4 and Chapter 5 of this Environmental Report.</p>
<p>We welcome the inclusion of the five-step process deriving from <i>Good Practice Advice Note 3: The Setting of Heritage Assets</i>. However, we note the development of a site may not only affect the setting of an asset and therefore suggest that the advice and process found in <i>Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans (as opposed to GPA3)</i>, although similar, may be of more relevance to this exercise as it specifically relates to our suggested process for assessing the potential impact of site allocations and ways in which to minimise or mitigate harm.</p>	<p>Comment noted. The documents have been a useful source of reference during the SEA process.</p>
<p>We are pleased to note that the potential for non-designated archaeological heritage assets is considered, and that Suffolk HER has been consulted at a high level. We note the evidence gap highlighted regarding the understanding of the character of the plan area, and therefore recommend that, in order to ensure that its conclusions are robustly justified, the SEA assessment should be informed by the production of an historic area assessment or neighbourhood area character assessment.</p>	<p>Comment noted. Potential impacts to landscape character and the historic environment associated with the policies and proposals within the Neighbourhood Plan is presented within Chapter 4 and Chapter 5 of this Environmental Report.</p>
<p>Historic England strongly advises that the conservation and archaeological staff of the relevant local planning authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), which should be consulted as part of the SEA process. In addition, they will be able to advise how any site allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.</p>	<p>Comment noted.</p>

Consultation response	How the response was considered and addressed
<p>To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SA/SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that, despite the SA/SEA, these would have an adverse effect upon the environment.</p>	<p>Comment noted.</p>
<p>Environment Agency <i>East Anglia Area (West) (response received on 27th July 2020)</i></p>	
<p>We have reviewed the report and we agree with the following key issues which fall within Environment Agency's remit:</p> <ul style="list-style-type: none"> • Biodiversity and geodiversity • Climate change and flood risk • Water resources and water quality 	<p>Comment noted.</p>
<p>We welcome the identified key SEA objectives in particular:</p> <ul style="list-style-type: none"> • Support the resilience of the neighbourhood area to the potential effects of climate change, including flooding • Use and management of water resources in a sustainable manner • Protect and enhance all biodiversity and geodiversity 	<p>Comment noted.</p>
<p>Natural England <i>Norfolk and Suffolk Team (response received on 23rd July 2020)</i></p>	
<p>Natural England does not have any specific comments on this SEA Scoping Report for the neighbourhood plan.</p>	<p>Comment noted.</p>
<p>However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.</p>	<p>Comment noted. The advice within the annex has been a useful reference point during the SEA process.</p>

3.5 Since the publication of the SEA Scoping Report in July 2020, it is acknowledged that there have been several emerging policy drivers and evidence base documents which have informed the development of the Neighbourhood Plan. Key sources of evidence in this respect include the revised [NPPF](#) (2023), the [Environment Act](#) (2021), the [Levelling-Up and Regeneration Bill](#) (2022), and the preferred options consultation on the emerging Local Plan (and accompanying Interim Sustainability Appraisal Report and evidence base)²¹.

²¹ AECOM (2022): 'Sustainability Appraisal (SA) of the West Suffolk Local Plan: Interim SA Report', available to access [here](#)

3.6 These policy considerations and evidence base documents have been essential sources of evidence during the subsequent stages of the SEA process.

3.7 The key sustainability issues and SEA Framework are presented below.

Key sustainability issues

Air Quality

- There are no Air Quality Management Areas (AQMA) within the neighbourhood area. However, the latest Annual Status Report 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.

3.8 Due to the absence of any significant air quality issues within the neighbourhood area itself, **the air quality theme has been scoped out for the purposes of the SEA process.**

Biodiversity and Geodiversity

- The nearest European designated sites are located to the north of the neighbourhood area, namely: Breckland SPA and SAC.
- There are six SSSIs within 5km of the neighbourhood 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 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 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 (CWS).

Climate Change

- Any increases in the built footprint of the neighbourhood area (associated with the delivery of new housing and employment land) has the potential to increase 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 declared a climate emergency in 2019 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 area.
- Surface water flood risk is prevalent in the neighbourhood 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 area to the effects of climate change by supporting and encouraging adaptation strategies.

Landscapes

- The nearest nationally protected landscape, the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB), is located approximately 30km to the south east of the neighbourhood area (at its nearest point).
- The neighbourhood area is within The Brecks National Character Area (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 Landscape Character Assessment (LCA), the neighbourhood 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 Tree Preservation Orders (TPO) within the district in the interest of their amenity value. It is currently not possible to determine whether any of the TPO are within the neighbourhood 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.

Historic Environment

- The neighbourhood area has a rich historic environment.
- The neighbourhood 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 area are at risk.

- There are three scheduled monuments within or within proximity to the neighbourhood 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 area.
- There are 71 features within Barrow based on a high-level review of the Suffolk Historic Environment Record (HER). 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.

Land, Soil, and Water Resources

- The provisional Agricultural Land Classification (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 area include the Cavenham Stream (a tributary of the River Lark), alongside a network of drainage ditches.
- The neighbourhood 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 Nitrate Vulnerable Zone (NVZ), and the 'Anglian Chalk' Ground Water NVZ.
- There are three Source Protection Zones (SPZ) within the neighbourhood 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 area is within the category of 'broad sand and gravel extraction, aggregate handling and recycling services' in association with the Suffolk Minerals Core Strategy.

Population and Community

- The largest age group within the population are those aged 60 or over (31.8%), which indicates an ageing population within the neighbourhood area.
- Population growth within the neighbourhood 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 area.
- The neighbourhood 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.

Health and Wellbeing

- 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 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 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.

Transportation

- The A14, which is part of the strategic road network, runs adjacent to the northern half of the neighbourhood area. Junctions onto the A14 suffer from congestion.
- Whilst the neighbourhood 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 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%).

SEA Framework

3.9 The SEA Framework provides a way in which environmental effects can be defined and subsequently analysed based on standard 'tests'. Each proposal within the current version (i.e., the submission version) of the Barrow cum Denham will be assessed consistently using the framework.

Table 3.2: SEA Framework of objectives and assessment questions

SEA Objective	Assessment questions to consider for the allocations / proposals within the Barrow cum Denham Neighbourhood Plan
Biodiversity and Geodiversity	
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 area? • Support the status of the nationally and locally designated sites within and within proximity to the neighbourhood 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?
Climate Change	
Reduce the contribution to climate change made by activities within the neighbourhood area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • 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?

SEA Objective	Assessment questions to consider for the allocations / proposals within the Barrow cum Denham Neighbourhood Plan
<p>Support the resilience of the neighbourhood area to the potential effects of climate change, including flooding</p>	<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 area? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?
<p>Landscape</p>	
<p>Protect and enhance the character and quality of landscapes and villagescapes.</p>	<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 area? • Conserve and enhance locally important landscape and villagescape features within the neighbourhood area? • Conserve and enhance local diversity and character? • Protect locally important viewpoints contributing to the sense of place and visual amenity of the neighbourhood area?
<p>Historic Environment</p>	
<p>Protect, conserve, and enhance heritage assets within the neighbourhood area</p>	<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?

SEA Objective	Assessment questions to consider for the allocations / proposals within the Barrow cum Denham Neighbourhood Plan
Land, Soil, and Water Resources	
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?
Population and Community	
<p>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> <p>Reduce deprivation and promote a more inclusive and self-contained community.</p>	<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? • 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?

SEA Objective	Assessment questions to consider for the allocations / proposals within the Barrow cum Denham Neighbourhood Plan
Health and Wellbeing	
<p>Improve the health and wellbeing residents within the neighbourhood area.</p>	<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?
Transportation	
<p>Promote sustainable transport use and reduce the need to travel.</p>	<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?

4. Consideration of reasonable alternatives through the SEA

Introduction

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

Defining reasonable alternatives

- 4.3 Whilst work on the Barrow cum Denham Neighbourhood Plan has been underway for some time, the aim here is not to provide a comprehensive explanation of work to date, but rather to explain work undertaken to develop and appraise reasonable alternatives.
- 4.4 In the context of the above, this chapter of the Environmental Report presents information on reasonable alternative approaches to addressing key issues that are of central importance to the Barrow cum Denham Neighbourhood Plan.

Housing numbers to deliver through the Neighbourhood Plan

- 4.5 A Housing Needs Assessment (HNA) was completed in 2019 to contribute to the evidence base for the Neighbourhood Plan²². In terms of housing numbers, the HNA suggested a target of 154 dwellings for the neighbourhood area. At the time of completing the HNA, engagement with West Suffolk Council suggested a higher target of 225 dwellings. Given a total of 77 dwellings had already been secured through existing completions and commitments within the neighbourhood area, it was anticipated that a residual target of between 77 dwellings (based on the conclusions of the HNA) and 148 dwellings (based on the engagement with West Suffolk) would be delivered during the plan period.
- 4.6 Since the completion of the HNA, the emerging West Suffolk Local Plan has continued to develop, including discussions between West Suffolk Council and Barrow cum Denham Parish Council regarding housing numbers. As reflected in 'Part Three: Site Allocations' within the West Suffolk Local Plan Preferred Options consultation document²³, West Suffolk Council provides an indicative target of 170 new dwellings for the neighbourhood area²⁴.

²² The HNA accompanies the evidence base for the Neighbourhood Plan.

²³ West Suffolk Council (2022): 'West Suffolk Local Plan Preferred Options – Part Three: Site Allocations', [online] available to access [here](#)

²⁴ It is recognised that the West Suffolk Local Plan Submission Draft (2024) provides an updated indicative capacity of 165 homes for the neighbourhood area, slightly fewer than the number proposed within the Preferred Options document.

4.7 In this context, a key focus of the Barrow cum Denham Neighbourhood Plan is to identify and allocate site(s) to meet housing needs.

Consideration of potential site options

4.8 In recognition of the above, Barrow cum Denham Parish Council completed a local call for sites in October 2020, along with a consideration of sites which were included in West Suffolk’s Issues and Options Site Submission Review²⁵.

4.9 The Neighbourhood Plan Steering Group (with support from an independent planning consultancy) completed assessments of the various sites²⁶ in the parish in terms of their suitability, availability, and achievability for the purposes of a potential Neighbourhood Plan allocation.

4.10 A total of 15 sites were assessed. Following this process, eight sites were given a ‘red’ rating (i.e., unsuitable for development). Reasons listed within the site assessment report include access issues, relative distance from Barrow village centre (encroaching into the open countryside, contrary to local policy provisions), potential coalescence between settlements, concerns regarding impacts to the setting of designated heritage assets, and adverse impacts to the character of the built form within the village.

4.11 A total of seven sites were identified as appropriate locations to consider as possible allocations for the Barrow cum Denham Neighbourhood Plan. One site was given a ‘green’ rating (i.e., suitable without constraints) and six sites were given an ‘amber’ rating (i.e., potentially suitable, with some minor constraints). The sites are listed in **Table 4.1** below.

Table 4.1: Sites taken forward for further consideration through the SEA

SEA ID	Name of site, address	Size (Ha) ²⁷
BD1	Land south of Stoney Lane	0.39
BD6	Land east of Barrow Hill	8.60
BD8	Land south of Barrow Forge	1.41
BD9	Land south of Denham Lane	0.66
BD10	Old Bakehouse Site	0.13
BD12	Land west of Barrow Hill	3.50
BD13	Land south of Bury Road	10.0

4.12 With further respect to the seven sites, Site BD10 has since been delivered (an infill site providing one dwelling). Site BD1 has also been excluded at this stage in light of:

- The relatively small size of the site, and the availability of alternative larger sites which can positively contribute to local housing requirements and potentially unlock a greater percentage of affordable dwellings.

²⁵ Forming part of an issues and options consultation which was completed between October and December 2020 to inform the development of the emerging West Suffolk Local Plan.

²⁶ The initial site assessment report contributes to the evidence base for the Barrow cum Denham Neighbourhood Plan and accompanies the evidence base for the Neighbourhood Plan

²⁷ Represents total site size and not necessarily the total developable area.

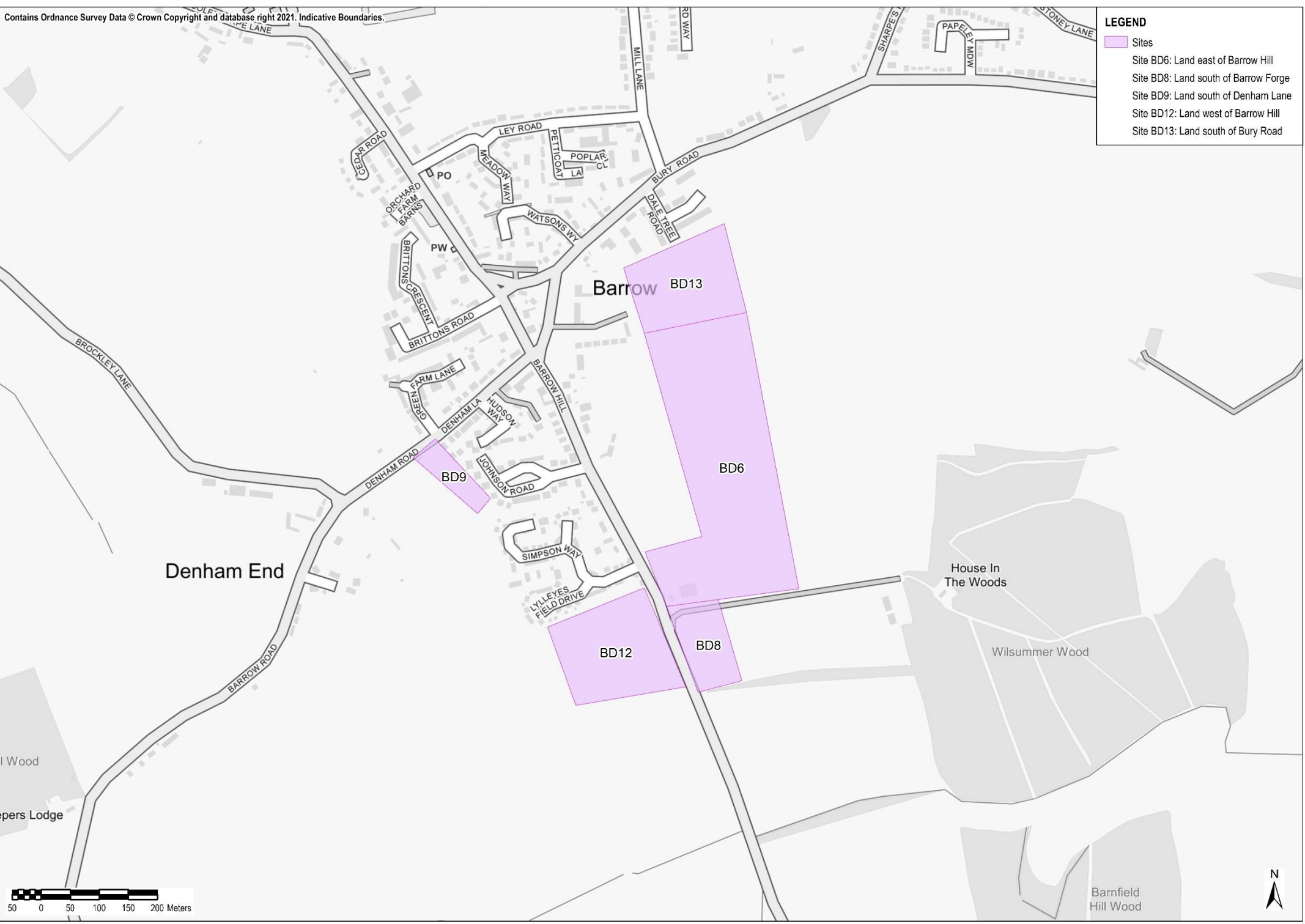
- Further reflection on some of the site constraints, with access identified as a key concern; and
- The location of the site within Burthorpe, to the west of the main settlement of Barrow village (i.e., the preferred location of growth as per local policy provisions, with Barrow identified as a 'key service centre').

4.13 Nevertheless, the Neighbourhood Plan Steering Group recognises the potential of Site BD1 (reflecting the findings of the site assessment process) and acknowledges that the site may come forward during the lifetime of the plan period (just not specifically as a Neighbourhood Plan allocation).

4.14 The remaining five 'amber' sites are the focus for the SEA. The site locations and areas are shown in the figure below, located on land which is situated within or adjacent to Barrow village.

LEGEND

- Sites
- Site BD6: Land east of Barrow Hill
- Site BD8: Land south of Barrow Forge
- Site BD9: Land south of Denham Lane
- Site BD12: Land west of Barrow Hill
- Site BD13: Land south of Bury Road



Spatial strategy options to consider through the SEA

4.15 To support the choice of a development strategy for the Barrow cum Denham Neighbourhood Plan, the SEA process has assessed a number of spatial strategy options as reasonable alternatives. These spatial strategy options comprise packages of the sites identified above, which are summarised below²⁸.

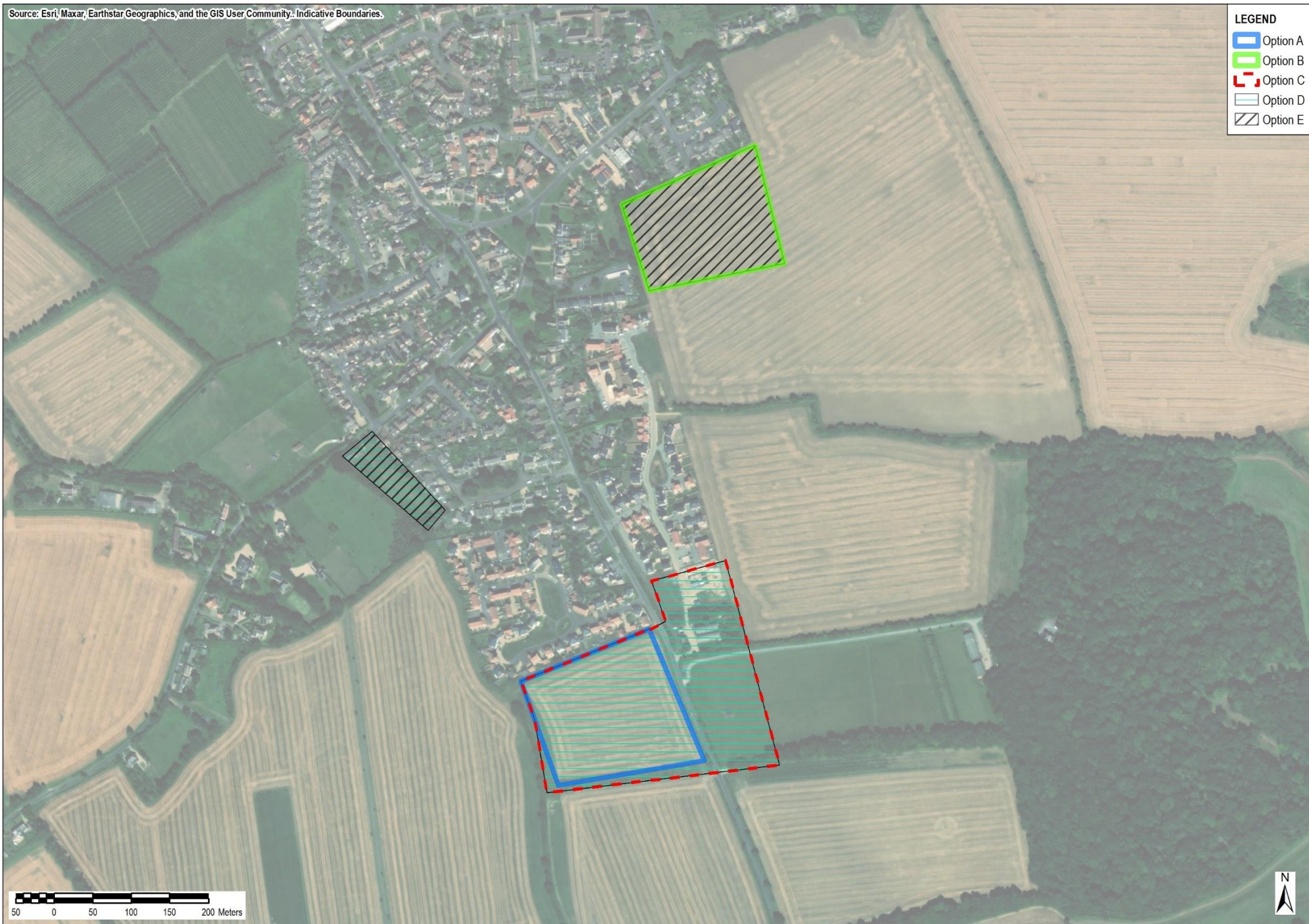
- **Option A:** Delivery of new housing through an allocation at Site BD12.
- **Option B:** Delivery of new housing through an allocation at Site BD13.
- **Option C:** Delivery of new housing through allocations at Site BD6, Site BD8 and Site BD12. Specifically, the sections of the site which, when combined, create a neat curtilage to the southern part of the village.
- **Option D:** Delivery of new housing through allocations at Site BD6, Site BD8, Site BD9 and Site BD12. All four sites are identified as having direct access to the existing road network.
- **Option E:** Delivery of new housing through allocations at Site BD9 and Site BD13. These sites are West Suffolk Council's preferred site options²⁹.

4.16 The map below visually presents these five options.

²⁸ The full areas of the sites (as put forward through the 'call for sites', and West Suffolk's Issues and Options Site Submission Review) have been considered within the site assessment process. For the purposes of the SEA, the areas of the sites which have been included within the options appraisal reflect the locations which are considered the most suitable areas to take forward for new development (i.e., the least constrained parts of the sites). This reflects the conclusions of the site assessment process, and community preferences with regards to the potential location of new development within the neighbourhood area.

²⁹ Within the Preferred Options consultation document (and also within the West Suffolk Local Plan Submission Draft), the area proposed for Site BD13 reflects the total area of the site (as considered within the site assessment process). It is recognised that the area of the site proposed through the SEA options appraisal (which is a reduced area, reflecting the site assessment conclusions) might not be large enough to meet the housing target. Therefore, for some of the options, additional sections of the site(s) (i.e., those identified as the more constrained areas reflecting the site assessment conclusions) may also need to come forward to meet the housing target.

- LEGEND**
- Option A
 - Option B
 - Option C
 - Option D
 - Option E



Appraisal findings

4.17 Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the appraisal has been presented through eight SEA Themes, as follows:

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

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

4.19 Sources of information to support the appraisal has included (amongst others): Ordnance Survey maps, MAGIC Interactive Map³⁰, the Environment Agency's Flood Risk Maps for England³¹, Natural England's Agricultural Land Classification maps³², Google Earth³³, reports and interactive mapping layers available on West Suffolk Council's webpages³⁴, the Suffolk Historic Environment Record³⁵, and baseline studies provided by the Neighbourhood Plan Steering Group.

4.20 **Table 4.2** to **Table 4.9** below present the findings of the appraisal of the five spatial strategy options for each of the SEA themes.

³⁰ MAGIC (2021): 'Interactive Map', [online] available to access via [this link](#)

³¹ Environment Agency (2021): 'Flood Map for Planning', [online] available to access via [this link](#)

³² Natural England (2021): 'Regional Agricultural Land Classification Maps and Likelihood of Best and Most Versatile Land', [online] available to access via [this link](#)

³³ Google (2021): 'Google Earth', [online] available to access via [this link](#)

³⁴ West Suffolk Council (2022): 'Environmental Services', [online] available to access via [this link](#)

³⁵ Suffolk Council (2022): 'Suffolk HER – Heritage Explorer', [online] available to access via [this link](#)

Table 4.2: Appraisal findings: Biodiversity and Geodiversity

Discussion of potential effects and relative merits of options	Rank of preference				
	A	B	C	D	E
<p>Option A: Allocation at Site BD12</p> <p>Option B: Allocation at Site BD13</p> <p>Option C: Allocations at Site BD6, Site BD8 and Site BD12</p> <p>Option D: Allocations at Site BD6, Site BD8, Site BD9 and Site BD12</p> <p>Option E: Allocations at Site BD9 and Site BD13</p>					
<p>There are no internationally or nationally designated sites directly within the neighbourhood area. In the wider context, the Breckland Special Protection Area (SPA) and Breckland Special Area of Conservation (SAC) are located to the north of the neighbourhood area (north of the A14 trunk road). 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). It is important to highlight that the potential site allocations considered through all options fall within the 12km buffer zone for the Breckland SPA and Breckland SAC. As such, development through all options has the potential to impact the integrity of these internationally designated sites in the absence of mitigation measures.</p> <p>Although there are no nationally designated sites within the neighbourhood area, there are several Sites of Special Scientific Interest (SSSI) within proximity, including Cavenham SSSI; Lackford Lakes SSSI; West Stow Heath SSSI; Red Lodge Heath SSSI; and Barton Mills SSSI. In this respect, the whole of the neighbourhood area overlaps with either one or multiple SSSI Impact Risk Zones (IRZ) for the types of development likely to be taken forward during the plan period. With reference to the potential site allocations, the SSSI IRZ threshold is associated with 'any residential developments of 100 units or more'. As the indicative housing requirement for the neighbourhood area totals 170 new dwellings, consultation with Natural England may be required to determine whether the applications will have any significant impacts to the integrity of these sites.</p> <p>Outside of areas with statutory protection, County Wildlife Sites (CWS) are some of the most important areas for wildlife in Suffolk and can support both locally and nationally threatened wildlife species and habitats. In this regard, Site BD6, Site BD8, and Site BD12 (as proposed through Option A, Option C and Option D) are part of larger agricultural fields that extend eastwards to the adjacent Wilsummer Wood CWS (which comprises areas of deciduous woodland and ancient woodland priority habitats). Therefore, new development areas at these locations have the potential to impact Wilsummer Wood CWS (i.e., through enhanced access, disturbance and trampling). Nevertheless, sensitive design at these locations also has the potential to strengthen the integrity of the CWS, including through the provision of green buffers or corridors between the CWS and development areas. Proposals for larger sites have the potential to be designed incorporate green infrastructure enhancements at a scale which can positively contribute to local networks, linking areas together and positively contributing to biodiversity objectives. In this context, all options have the potential to enhance ecological networks through new development areas, providing proposals are designed to deliver measurable, proportionate, and appropriate biodiversity net gains in line with national and local policy.</p> <p>In conclusion, all options have the potential to impact upon the integrity of internationally and nationally designated sites for biodiversity, as the number of new dwellings to come forward (totalling up to 170 dwellings) may exceed SSSI IRZ thresholds. However, given the relative distance of the Site BD9 and Site BD13 from Wilsummer Wood CWS, Option B and Option E are more favourable options in relation to the biodiversity and geodiversity SEA theme.</p>	3	1	3	3	1

Table 4.3: Appraisal findings: Climate Change

Discussion of potential effects and relative merits of options	Rank of preference				
	A	B	C	D	E
<p>Option A: Allocation at Site BD12</p> <p>Option B: Allocation at Site BD13</p> <p>Option C: Allocations at Site BD6, Site BD8 and Site BD12</p> <p>Option D: Allocations at Site BD6, Site BD8, Site BD9 and Site BD12</p> <p>Option E: Allocations at Site BD9 and Site BD13</p>					
<p>In response to the UK Government’s commitment to tackling the climate crisis, West Suffolk Council declared a Climate Emergency in September 2019 and at the same time, are committed to making the authority net-zero carbon by 2030. In the context of this, it will be important for the Barrow cum Denham Neighbourhood Plan to encourage proposals which seek to mitigate and adapt to climate change.</p> <p>In terms of climate change mitigation, road transport is a significant contribution to emissions within West Suffolk. Therefore, development within proximity to Barrow village centre (i.e., locations within the neighbourhood area with the greatest variety of services and facilities) will, to an extent, help limit greenhouse gas emissions from transport through encouraging new development in locations with proximity to the key amenities and public transport networks. Whilst all the sites are adjacent to the existing built-up areas of Barrow village, Site BD13 is the closest and (along with Site BD9) benefits from pedestrian connectivity. Site BD6, Site BD8 and Site BD12 are located to the south of the village, at further distance from the centre, and do not currently benefit from pedestrian access. In this respect, Option B and Option E are more favourable options in terms of limiting emissions from transport.</p> <p>New development areas have the potential to increase flood risk through factors such as changing surface and ground water flows, overloading existing inputs to the drainage and wastewater networks or increasing the number of residents exposed to areas of existing flood risk. In relation to adapting to the effects of climate change, Barrow village is wholly located within Flood Zone 1 which represents areas of England which have a low fluvial flood risk potential. Given that all potential site allocations are within Flood Zone 1, fluvial flood risk is unlikely to comprise a significant constraint to development through all options. It is also considered that the provisions of the NPPF and local policy (including relating to the sequential / exception test) will help guide development away from potential flood risk areas and ensure that appropriate mitigation measures are implemented.</p> <p>Regarding surface water flood risk issues, areas at ‘medium’ to ‘high’ risk within Barrow village are primarily located along the road network. The potential site allocations mostly comprise areas of ‘very low’ or ‘low’ risk. However, as all the sites are greenfield land, allocations at these locations are likely to increase areas of hardstanding and potentially increase the surface water flood risks to surrounding locations. Nonetheless, it is anticipated that surface water flood risk issues could largely be contained to all sites via the use of appropriate drainage systems which would minimise the risk of surface water run-off to surrounding areas. Overall, flood risk concerns are likely to be similar with respect to all options in the absence of any significant issues with the potential site allocations.</p> <p>Potential impacts relating to climate change are largely dependent on the extent to which mitigation and adaptation measures are incorporated into the design of new development areas. Therefore, if Option A, Option C, or Option D are taken forward, proposals should seek to improve connections to the village centre and maximise opportunities for active travel. This is further discussed within the ‘transportation’ appraisal section, presented in Table 4.9 later in this Chapter.</p>	3	1	3	3	1

Table 4.4: Appraisal findings: Landscape

Discussion of potential effects and relative merits of options	Rank of preference				
	A	B	C	D	E
<p>The neighbourhood area is not within or within proximity to a National Park, Area of Outstanding Natural Beauty, or any Green Belt land. In this context, none of the options would adversely impact the integrity of any nationally protected landscapes. At the local level, landscape and villagescape character plays an important part in understanding the relationship between people and place, identifying recognisable and distinct patterns which make one area different from another. Landscape and villagescape character can assist in the assessment of the likely significance of effects of change resulting from new development areas, both in visual and amenity terms. A summary of the sensitivities for each site is provided below:</p> <ul style="list-style-type: none"> • Option A – Whilst an allocation at Site BD12 would be in keeping with the existing built-form and development patterns (i.e., containing development to the west of Barrow Hill), the development of the whole site area would extend the village approximately 250m to the south, into the open countryside. Although the site is relatively open in character, it is contained from views on three sides by trees and hedgerows (assisted in part by its flat topography). The site is overlooked by to the north by homes and gardens on Simpson Way, and forms part of the southern gateway into the village (via Barrow Hill). • Option B – An allocation at Site BD13 would elongate the settlement to the east, which currently comprises areas of open countryside. Arguably, new development areas would be less in keeping with the existing built form and development patterns, but the design of the new development could link with the existing housing to the north and west. The site is relatively overlooked in this respect but is predominantly flat. Some longer views to the north east towards the neighbouring settlement of Burthorpe are possible, with the potential intervisibility between the site and Burthorpe an important consideration. • Option C – Allocations at Site BD6, Site BD8 and Site BD12 would extend the village to the south by approximately 100m. However, the extent of development to the west of Barrow Hill, once complete, would align with the existing historic pattern to the east of Barrow Hill. The north eastern sections of the proposed site boundary are already in partial use, comprising areas of brownfield land which are perhaps less sensitive to new development (and more suited for redevelopment). However, the relationship between the sites, the properties along Simpson Way, Wilsummer Woods CWS, and the southern gateway in to the village (via Barrow Hill), are important considerations. • Option D – While impacts are similar to those associated with Option C, the addition of Site BD9 would partially reduce the gap between Barrow and Denham End, contributing to the potential coalescence of these settlements. Nevertheless, Site BD9 is relatively screened from view due to the vegetation (tree corridor) along its western boundary. In this respect, development at this location is not necessarily likely to increase any perceived coalescence between these two settlements or change the character of any views between the settlements. However, there are likely to be some views into the northern and eastern sections of the site from properties located along Denham Lane and Johnson Road. • Option E – Reflecting the potential coalescence concerns between Barrow and Denham End (as associated with Site BD9) and the contrast from the existing 					

Option A: Allocation at Site BD12

Option B: Allocation at Site BD13

Option C: Allocations at Site BD6, Site BD8 and Site BD12

Option D: Allocations at Site BD6, Site BD8, Site BD9 and Site BD12

Option E: Allocations at Site BD9 and Site BD13

Discussion of potential effects and relative merits of options	Rank of preference				
	A	B	C	D	E
<p>development patterns (as associated with Site BD13), Option E is perhaps the most sensitive from a landscape and villagescape perspective.</p> <p>In summary, Option C is likely to perform most favourably in relation to the landscape SEA theme given the potential to create a neat edge to the south of the settlement (including within some areas of previously developed land). Comparatively, Option B and Option E are the least favourable options considering the potential coalescence concerns and departure from the existing built form. However, it is important to note that proposals for larger development areas (as proposed through all options) have the potential to positively contribute to wider landscape objectives through sensitive design. For example, delivering net gains in biodiversity and green infrastructure enhancements have the potential to help conserve and enhance landscape and villagescape character, including its special qualities and sense of place. For example, enhanced habitats (trees, hedgerows, grass, shrub, etc.) can form important parts of the landscape, and also provide a role in landscape buffering and planting, providing screening to restrict undesirable views. They can also play a role in contributing towards local distinctiveness and a sense of place.</p>					

Table 4.5: Appraisal findings: Historic Environment

Discussion of potential effects and relative merits of options	Rank of preference				
	A	B	C	D	E
<p>Option A: Allocation at Site BD12</p> <p>Option B: Allocation at Site BD13</p> <p>Option C: Allocations at Site BD6, Site BD8 and Site BD12</p> <p>Option D: Allocations at Site BD6, Site BD8, Site BD9 and Site BD12</p> <p>Option E: Allocations at Site BD9 and Site BD13</p>					
<p>In relation to historic environment constraints, the neighbourhood area contains one Grade I, one Grade II* and 30 Grade II nationally designated buildings, along with three scheduled monuments. Given the concentration of heritage assets within Barrow village, potential impacts to the historic environment are possible through options comprising sites within proximity to the existing village boundary. Whilst none of the sites contain any nationally designated heritage assets, an overview of the potential sensitivities is provided below:</p> <ul style="list-style-type: none"> • Site BD13 is potentially within the setting of the Grade II listed ‘The Weeping Willow Public House’ (to the north west) and the Grade II listed ‘Barrow House and Carriage Gateway’ (to the west). • Site BD6, Site BD8 and Site BD12 are all located over 400m to the south of the nearest nationally designated heritage assets. These heritage assets (listed buildings along Barrow Hill) are screened from view by the existing built-up areas within the village boundary. • Site BD9 is approximately 150m to the north west of two Grade II listed buildings (within Denham End). Given the visual screening provided by vegetation along the western boundary of the site, an allocation at this location is not likely to impact upon the setting of these buildings. <p>Reflecting the above, it is not anticipated that there would be any significant impacts to the integrity or setting of any nationally designated heritage assets as associated with Option A, Option C, and Option D. Consultation with Historic England is encouraged to ensure that development proposals at Site BD13 (as proposed through Option B and Option E) seek to implement sensitive design which respects and enhances the setting of nearby heritage assets.</p> <p>With reference to non-designated heritage assets and features, the Historic Environment Record (HER) for Suffolk contains a total of 71 locally important heritage features which contribute to the character and setting of the neighbourhood area. Available to view on the Suffolk Heritage Explorer (accessible here), this online tool provides an indication as to whether any of the sites may include structures or features of archaeological importance. Following a high-level review of the Suffolk Heritage Explorer, Site BD6, Site BD8 and Site BD12 perhaps have the greatest potential to contain undiscovered archaeological remains. Geophysical surveys and archaeological evaluations to date (as accessed on the Explorer), on land to the east and west of Barrow Hill, has recorded early Bronze Age features (including pottery fragments and animal bones), Roman tegula (roof tiles), and Medieval (late 12th - 13th century) remains. There are no monuments or events listed (or recorded) within Site BD9 and Site BD13, reflecting the information available on the Heritage Explorer. Nevertheless, this might be due to an absence of any surveys or evaluations at these locations to date. In the context of the above, applications for new development within the neighbourhood area (particularly associated with Option A, Option C, and Option D) should ensure that any archaeological finds (including details of their significance) are appropriately recorded in line with best practice guidance.</p>	1	4	1	1	4

Table 4.6: Appraisal findings: Land, Soil, and Water Resources

Discussion of potential effects and relative merits of options	Rank of preference				
	A	B	C	D	E
<p>Option A: Allocation at Site BD12</p> <p>Option B: Allocation at Site BD13</p> <p>Option C: Allocations at Site BD6, Site BD8 and Site BD12</p> <p>Option D: Allocations at Site BD6, Site BD8, Site BD9 and Site BD12</p> <p>Option E: Allocations at Site BD9 and Site BD13</p>					
<p>Regarding the location of the best and most versatile land for agricultural purposes, a detailed agricultural land classification (ALC) assessment has not been undertaken within the neighbourhood area. The provisional ALC dataset provided by Natural England indicates that the undeveloped areas surrounding Barrow village are predominantly underlain by areas of Grade 2 agricultural land (which is some of the best and most versatile land for agricultural purposes). As all the proposed site allocations comprise areas of greenfield land, all options have the potential to result in the permanent loss of productive agricultural land which cannot be mitigated. However, as the north eastern section of the site area proposed through Option C and Option D (Site BD6) comprises a small area of previously developed land, these options are slightly more favourable in this respect.</p> <p>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 and ponds. None of the potential site allocations contain or are within proximity to the Cavenham Stream, with limited impacts to the water environment associated with all options. However, all the potential site allocations are within the 'Ely Ouse and Cut-off channel' Surface Water Nitrate Vulnerable Zone (NVZ), the 'Anglian Chalk' Ground Water NVZ, and Source Protection Zone II 'Outer Protection'. In this respect, development proposals should be encouraged to deliver nitrate and water neutrality in line with latest guidance. However, this is a regional issue which is perhaps beyond the scope of the Neighbourhood Plan to address.</p> <p>Adopted in July 2020, the Suffolk Minerals and Waste Plan (accessible here) identifies areas for minerals and waste safeguarding. None of the potential site allocations are within a mineral consultation area (as shown on the safeguarding and proposals map). However, the map indicates that Site BD9 (as proposed through Option D and Option E) is within the boundary of a waste water treatment plants safeguarded area.</p>	3	3	1	2	5

Table 4.7: Appraisal findings: Population and Community

Discussion of potential effects and relative merits of options	Rank of preference				
	A	B	C	D	E
<p>Option A: Allocation at Site BD12</p> <p>Option B: Allocation at Site BD13</p> <p>Option C: Allocations at Site BD6, Site BD8 and Site BD12</p> <p>Option D: Allocations at Site BD6, Site BD8, Site BD9 and Site BD12</p> <p>Option E: Allocations at Site BD9 and Site BD13</p>					
<p>Accessibility to services and facilities is a key determinant of residents' quality of life. With regards to community assets, Barrow village is generally well served by local service offer. This includes a primary school (although it is recognised that the school is at full capacity), play school, village hall, a doctor's surgery, two pubs, three village shops, recreation grounds, and sporting facilities. It also has a well-used post office which serves many of the surrounding villages.</p> <p>While all the sites are adjacent to the existing built-up areas of Barrow village, Site BD13 is the closest and (along with Site BD9) benefits from pedestrian connectivity to the village centre. Site BD6, Site BD8 and Site BD12 are located to the south of the village, at further distance from the centre, and do not currently benefit from pedestrian connectivity. In this respect, Option B and Option E are more favourable options in terms of access to services and facilities.</p> <p>Proposals for larger sites have the potential to generate developer contributions which could provide additional (or expand the existing) services and facilities offer within the neighbourhood area, positively contributing to community vitality and wellbeing. Development of larger sites also increases the viability of providing housing of an appropriate type and tenure (including affordable housing) to meet local needs. In this respect, all options (which encompass sites with relatively large areas) have the potential to deliver wider benefits for the community. However, delivering a larger scheme is perhaps more challenging with respect to Site BD6, Site BD8 and Site BD12 given the multiple land ownership issues at these locations. The site area proposed through Option C and Option D encompass sections of each of the three sites to create a neat edge to the south of the village. Therefore, an allocation at these locations would require cooperation between landowners to bring forward a masterplan for this area which could help to unlock the potential of the sites. Additionally, Site BD6 is provisionally allocated for employment uses within the West Suffolk Local Plan Preferred Options consultation document. This could potentially reduce the capacity for housing, contributing less to local targets.</p>	3	1	4	4	1

Table 4.8: Appraisal findings: Health and Wellbeing

Discussion of potential effects and relative merits of options	Rank of preference				
	A	B	C	D	E
<p>Option A: Allocation at Site BD12</p> <p>Option B: Allocation at Site BD13</p> <p>Option C: Allocations at Site BD6, Site BD8 and Site BD12</p> <p>Option D: Allocations at Site BD6, Site BD8, Site BD9 and Site BD12</p> <p>Option E: Allocations at Site BD9 and Site BD13</p>					
<p>The benefits to wellbeing and mental health resulting from close contact with the natural environment are well-documented. In the context of the above, the performance of the options depends on the delivery of green infrastructure provision alongside new development. Proposals should therefore be encouraged to enhance green and blue infrastructure networks within the neighbourhood area. This could include via the incorporation of amenity greenspace, natural and semi-natural greenspaces, green corridors, and other outdoor areas (e.g., allotments, play spaces and community gardens).</p> <p>Proposals for larger sites have the potential to be sensitively and creatively designed to incorporate green and blue infrastructure enhancements at a scale which can positively contribute to local networks, linking areas together and positively contributing to biodiversity and landscape objectives (with indirect benefits to health and wellbeing). In this context, all options (which include relatively large sites) have the potential to deliver net gains in biodiversity and green infrastructure enhancements which can help conserve and enhance the special qualities of the neighbourhood area. This might be challenging for the areas proposed through Option C and Option D given the land ownership issues at these locations, and the potential difficulties associated with bringing forward a coordinated and master planned design across multiple site areas.</p> <p>Whilst all options are likely to encourage active lifestyles by facilitating development within proximity to Barrow village centre, Option B and Option E are likely to perform more favourably. This is given the relative proximity of the potential site allocations in these options to local services and facilities (including local green and blue areas such as Barrow Green and Barrow Lake), and the relative disjoint of Site BD6, Site BD8 and Site BD12 from these amenities. Additionally, Site BD9 and Site BD13 (as proposed through Option B and Option E) are the only sites which currently benefit from pedestrian connectivity to the village centre.</p>	3	1	4	4	1

Table 4.9: Appraisal findings: Transportation

Discussion of potential effects and relative merits of options	Rank of preference				
	A	B	C	D	E
<p>Option A: Allocation at Site BD12</p> <p>Option B: Allocation at Site BD13</p> <p>Option C: Allocations at Site BD6, Site BD8 and Site BD12</p> <p>Option D: Allocations at Site BD6, Site BD8, Site BD9 and Site BD12</p> <p>Option E: Allocations at Site BD9 and Site BD13</p>					
<p>With reference to local public transport networks, the neighbourhood area is not connected to the national rail network. Although there are bus routes which pass through Barrow village centre and connect to neighbouring settlements, service frequency is recognised as a key barrier to public transport use. Reflecting the above, there is a high dependency on private vehicles. Options which do more to reduce the dependence on private vehicles for undertaking some day-to-day activities within the neighbourhood area are better performing in relation to this SEA theme. In this respect, new development areas should be encouraged to provide connectivity and accessibility to local public transport networks and maximise opportunities for safe walking and cycling to local services and facilities. Delivering new development at Site BD6, Site BD8 and Site BD12 (as proposed through Option A, Option C and Option D) is perhaps less likely to reduce the reliance on private vehicles within the neighbourhood area. This is given their location to the south of the village, relative inaccessibility from local bus stops (which are predominantly contained within the village centre, and along Bury Road), and lack of pedestrian connections to the village centre from these locations.</p> <p>Regarding site access, most of the sites are connected to the existing highways network. Site BD6, Site BD8 and Site BD12 are accessible via a turning from Barrow Hill, and Site BD12 is accessible via a turning from Denham Road. While some of these entry points might need to be widened and upgraded to accommodate additional traffic, this is likely to be possible at these locations. Comparatively, Site BD13 is not currently connected to the existing highways network. However, there is potential to establish access into the northern section of the site (via a continuation of Dale Tree Road) or into the eastern section of the site (via the relatively narrow Lion Green). Access via Lion Green would require the removal of privately owned garages and is perhaps a less viable option the Dale Tree Road (which is wider, more suited for two-way traffic, and benefits from pedestrian connectivity to public transport options along Bury Road). Reflecting the above, site access is not likely to be problematic for Site BD13.</p>	3	1	3	3	1

Summary of appraisal findings

4.21 The table below summarises the rankings of the options with regards to their relative performance in relation to each SEA Theme.

Table 4.10: Summary of rankings by SEA Theme

SEA Theme	Option A	Option B	Option C	Option D	Option E
Biodiversity and Geodiversity	=3	=1	=3	=3	=1
Climate Change	=3	=1	=3	=3	=1
Landscape	2	4	1	3	5
Historic Environment	=1	=4	=1	=1	=4
Land, Soil and Water Resources	=3	=3	1	2	5
Population and Community	3	=1	=4	=4	=1
Health and Wellbeing	3	=1	=4	=4	=1
Transportation	=3	=1	=3	=3	=1

4.22 In conclusion, all options have the potential to impact upon the integrity of internationally and nationally designated sites for biodiversity, as the number of new dwellings to come forward (totalling up to 170 dwellings) may exceed SSSI IRZ thresholds. However, given the relative distance of the Site BD9 and Site BD13 from Wilsummer Wood CWS, Option B and Option E are somewhat more favourable options in relation to the biodiversity and geodiversity SEA theme.

4.23 While all the sites are adjacent to the existing built-up areas of Barrow village, Site BD13 is the closest to village amenities and (along with Site BD9) benefits from pedestrian connectivity to these amenities. Site BD6, Site BD8 and Site BD12 are located to the south of the village, at further distance from the centre, and do not currently benefit from pedestrian access. In this respect, Option B and Option E are more favourable in relation to the climate change, population and community, health and wellbeing, and transportation SEA themes. If Option A, Option C, or Option D are taken forward, proposals should seek to improve connections to the village centre and maximise opportunities for active travel.

4.24 From a landscape character perspective, Option C is likely to perform most favourably given the potential to create a neat edge to the south of Barrow village. Comparatively, Option B and Option E are the least favourable options considering the potential coalescence concerns and departure from the existing built form.

4.25 With respect to the historic environment SEA theme, it is not anticipated that there would be any significant impacts to the integrity or setting of any nationally designated heritage assets as associated with Option A, Option C, and Option D. Consultation with Historic England is encouraged to ensure that development proposals at Site BD13 (as proposed through Option B and Option E) seek to implement sensitive design techniques which respect and

enhance the setting of the two listed buildings within proximity to the site. Regarding non-designated heritage assets, applications for new development within the neighbourhood area (particularly associated with Option A, Option C, and Option D) should ensure that archaeological finds (including details of their significance) are appropriately recorded in line with best practice guidance.

- 4.26 As the proposed site allocations comprise areas of greenfield land (identified as Grade 2 land within the predictive ALC assessment), all options have the potential to result in the permanent loss of productive agricultural land which cannot be mitigated. However, as the north eastern section of the site area proposed through Option C comprises a small area of previously developed land, this option is slightly more favourable with regards to the land, soil, and water resources SEA theme.
- 4.27 The development of larger sites increases the viability of providing housing of an appropriate type and tenure (including affordable housing) to meet local needs. Larger sites also have the potential to be sensitively and creatively designed to incorporate green and blue infrastructure enhancements at a scale which can positively contribute to local networks, linking areas together and positively contributing to biodiversity and landscape objectives (with indirect benefits to health and wellbeing). In this respect, all options (which encompass sites with relatively large areas) have the potential to deliver wider benefits for the community. However, this might be challenging for the areas proposed through Option C and Option D (Site BD6, Site BD8, and Site BD12) given the land ownership issues at these locations, and the potential difficulties associated with bringing forward a coordinated and master planned design across multiple site areas. Additionally, a section of Site BD6 is provisionally allocated for employment uses within the West Suffolk Local Plan Preferred Options consultation document. This could potentially reduce the capacity for housing, contributing less to local targets.

Developing the preferred approach

Choice of sites taken forward for the purposes of the Neighbourhood Plan

- 4.28 A maximum of 165 homes³⁶ is to be met through the combination of sites proposed through **Option C** (i.e., Site BD6, Site BD8, and Site BD12). The preferred approach has been informed by the various surveys and evidence base documents prepared to support the Neighbourhood Plan (to date), responses from community consultation events, and the SEA findings.
- 4.29 Specifically, the Neighbourhood Plan states:

“The mixed-use site allocation is located in an area which has already successfully accommodated new housing growth in the recent past and which can deliver additional sustainable growth. Larger scale development to the South of Barrow will ensure that the settlement identity and character of nearby Denham and Burthorpe will also be protected from future erosion and coalescence.

“The identified BCD2 site allocation is characterised as a transitional, modern area of the village, which is less sensitive to future development change than

³⁶ It is recognised that the West Suffolk Local Plan Submission Draft (2024) provides an updated indicative capacity of 165 homes for the neighbourhood area, slightly fewer than the indicative capacity of 170 which was proposed within the Preferred Options document. The submission version of the Neighbourhood Plan seeks to align with the updated indicative total.

other, more constrained, edge of settlement areas, closer to the historic village core and its sensitive heritage assets. Notwithstanding this relationship, all existing services within Barrow will be fully accessible to the Site allocated under Policy BD2, via sustainable travel modes.”

4.30 Since the completion of the reasonable alternatives assessment, further discussions between the neighbourhood group, the Parish Council, and site promoters have taken place with respect to the design of the preferred site allocation. In this context, the boundary has been extended to encompass the full area of Site BD6 (as shown in the figure below).

4.31 The key constraints to development within the additional area primarily link to the landscape and heritage sensitivities. The Site Options and Assessment (SOA) findings confirm the following:



- The site is open to the north and east, however the site contains limited landscape features of value and could be considered of medium sensitivity in terms of visual amenity due to intervisibility with the surrounding landscape. However, development of the site would require a defensible boundary and landscape-buffer to the east.
- The site is flat and part of wider agricultural fields to the east of the village and surrounded on three sides by open fields with views across open countryside.
- There are no significant constraints to development. However, further assessment would be required to understand other environmental issues such as archaeological finding and recreational pressure.

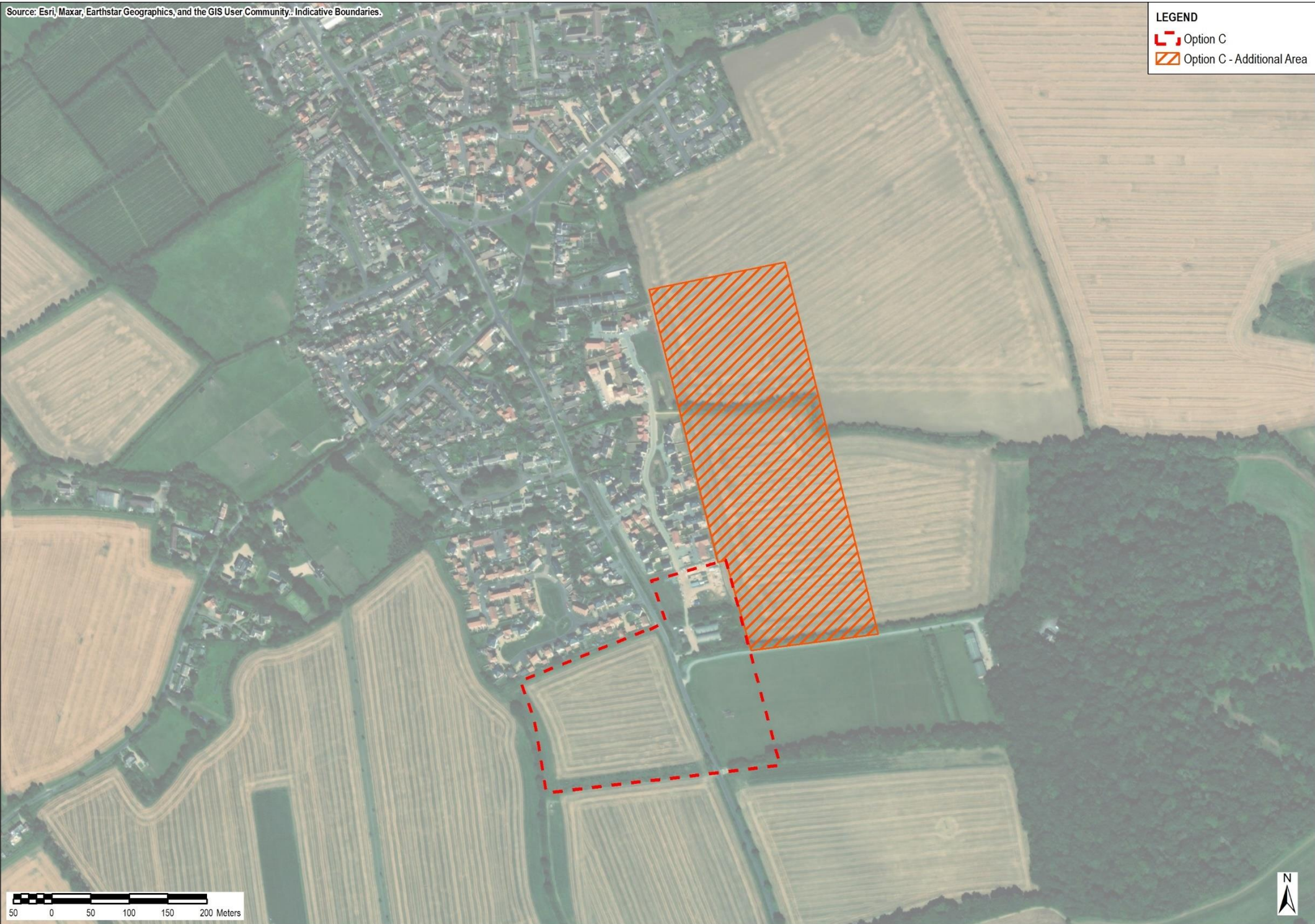
4.32 With respect to the above, the Neighbourhood Plan recommends that the site is brought forward via a comprehensive concept diagram (see Figure 4 within the Neighbourhood Plan), working collaboratively with site promoters to ensure that the scheme:

- Appropriately addresses any constraints to development.
- Delivers key community aspirations through the design of new development areas (e.g., the provision of new community assets and infrastructure); and
- Positively contributes towards the wider visions and objectives for the neighbourhood area.

4.33 The site-specific policy for the proposed site allocation within the Barrow cum Denham Neighbourhood Plan (see Policy BCD2) contains further detail with respect to design and mitigation considerations which aim to address any potential constraints to development. These aspects are further discussed within the plan appraisal section of the Environmental Report (presented in **Chapter 5**, below).

LEGEND

-  Option C
-  Option C - Additional Area



5. Appraisal of the submission version of the Neighbourhood Plan

Introduction

5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the submission version of the Barrow cum Denham Neighbourhood Plan. This chapter presents:

- An appraisal of the current version (i.e., the submission version) of the Barrow cum Denham Neighbourhood Plan under the eight SEA theme headings.
- Consideration of potential cumulative effects; and
- The overall conclusions at this current stage.

Barrow cum Denham Neighbourhood Plan policies

5.2 To support the implementation of the vision statement for the Barrow cum Denham Neighbourhood Plan, the submission version of the plan puts forward 12 policies to guide new development within the neighbourhood area. Specifically:

Policy reference	Policy name
BCD1	The Spatial Planning Strategy
BCD2	Strategic Site Allocation: Land at Barrow Hill
BCD3	Non-Strategic Housing Delivery
BCD4	Special Needs and Local Affordable Housing
BCD5	New Development and High-Quality Design
BCD6	Sustainable Design and Construction
BCD7	Local Employment Strategy
BCD8	Support for New and Existing Community Facilities
BCD9	Support for New Sport and Recreation Facilities
BCD10	Ecology and the Natural Environment
BCD11	Protection of Local Heritage Assets
BCD12	Active Transport and Accessibility

Approach to this appraisal

- 5.3 For each theme, 'significant' effects of the submission version of the Barrow cum Denham Neighbourhood Plan on the baseline are predicated and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. For example, account is taken of the probability, duration, frequency, and reversibility of the effects as far as possible. These effect 'characteristics' will be described within the assessment, as appropriate.
- 5.4 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high-level nature of the Barrow cum Denham Neighbourhood Plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects to ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.
- 5.5 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.

Biodiversity and Geodiversity

- 5.6 Given the proximity of the neighbourhood area to internationally and nationally designated sites for biodiversity and geodiversity, a Habitats Regulation Assessment (HRA)³⁷ process has been completed for the Neighbourhood Plan. Providing any recommendations within the HRA are incorporated into the submission version of the Neighbourhood Plan, it is anticipated that there would be no adverse effects to the integrity of these sites, either alone or in-combination with other plans and projects.
- 5.7 Although there are no nationally designated sites within the neighbourhood area, there are several Sites of Special Scientific Interest (SSSI) within proximity, including Cavenham SSSI; Lackford Lakes SSSI; West Stow Heath SSSI; Red Lodge Heath SSSI; and Barton Mills SSSI. In this respect, the whole of the neighbourhood area overlaps with either one or multiple SSSI Impact Risk Zones (IRZ) for the types of development likely to be taken forward during the plan period. With reference to the proposed site allocation through Policy BCD2, the SSSI IRZ threshold is associated with 'any residential developments of 100 units or more'. As the proposed site allocation through Policy BCD2 seeks to deliver a maximum of 165 homes, consultation with Natural England may be required to determine whether the applications will have any significant impacts to the integrity of these sites.
- 5.8 In light of the key sensitivities listed above, a key objectives within the Neighbourhood Plan is to respect and enhance the natural environment. This is recognised and acknowledged within several policies which will 1) help limit potential effects on features and areas of ecological interest and 2) support the resilience of green infrastructure networks. This is further discussed below.

³⁷ AECOM (September 2024) – HRA Report' *The HRA contributes to the evidence base for the Neighbourhood Plan.*

- 5.9 With respect to the preferred site allocation, the site is part of larger network of agricultural fields that extend eastwards to the adjacent Wilsummer Wood CWS (which comprises areas of deciduous woodland and ancient woodland priority habitats). Therefore, new development areas at these locations have the potential to impact Wilsummer Wood CWS (i.e., through enhanced access, disturbance and trampling). Sensitive design at these locations also has the potential to strengthen the integrity of the CWS, including through the provision of green buffers or corridors between the CWS and development areas. In this respect, Policy BCD2 states that the site should deliver green infrastructure, including the creation of deliverable biodiversity and habitat enhancements.
- 5.10 The nature, scale, timing, and duration of some development activities can result in the disturbance of protected species. This can include effects of poor air quality on designated sites, and severance of ecological networks from new development areas. In this respect, the Neighbourhood Plan also sets out provisions which will support and enhance habitats, species, and ecological networks. A key policy in this respect is Policy BCD10, which confirms that development must protect and enhance biodiversity to ensure an overall biodiversity net gain. This includes measures to support the ecological improvement of wildlife habitats and ensuring resilience through incorporating a variety of species into new development areas.
- 5.11 Overall, Neighbourhood Plan policies should help ensure that ecological sensitivities are appropriately considered during the planning, construction, and operational phases for new development proposals which come forward during the plan period, whilst also delivering net gains.

Climate Change

- 5.12 In response to the UK Government's commitment to tackling the climate crisis, West Suffolk Council declared a Climate Emergency in September 2019 and at the same time, are committed to making the authority net-zero carbon by 2030. As such, the Barrow cum Denham Neighbourhood Plan should encourage design features that help the area to mitigate and adapt to climate change and increase the resilience of the neighbourhood area and its community. These stipulations will help to tackle the climate crisis.
- 5.13 The extent to which the Neighbourhood Plan has the potential to support climate change mitigation efforts is dependent (in part) on a distribution strategy which promotes development at locations in closer proximity to the existing services and facilities in the neighbourhood area. The proposed site allocation includes areas of land located to the south of Barrow village, at further distance from the village centre, that do not currently benefit from pedestrian access. In this respect, Neighbourhood Plan policy provisions seek to improve connections to the village centre and maximise opportunities for active travel (see Policy BCD2 and Policy BCD12). These provisions will support a limitation of emissions by encouraging opportunities to engage with sustainable and active travel within the neighbourhood area.
- 5.14 Further contributing to climate change mitigation efforts, Policy BCD6 seeks to ensure that proposals minimise the carbon footprint of the development, supporting low and zero carbon energy sources (where appropriate) and promoting the efficient re-use and recycling of resources. This policy will help

to reduce emissions through supporting sustainable design and construction methods within new development areas.

5.15 With reference to adapting to the effects of climate change, Barrow village is wholly located within Flood Zone 1 which represents areas of England which have a low fluvial flood risk potential. Given that the proposed site allocation is within Flood Zone 1, fluvial flood risk is unlikely to comprise a significant constraint to development. Policy BCD2 confirms that the proposed site allocation should include sustainable drainage facilities to tackle surface water concerns. Additionally, Policy BCD10 seeks to enhance green infrastructure and deliver net gains within the neighbourhood area. These policy provisions will positively respond to the potential effects of climate change (particularly from extreme weather events) through providing summer shading and shelter and reducing surface water run-off issues. It is also anticipated that the provisions of the NPPF and Local Plan policy will help to guide development away from the areas at highest risk of flooding.

Landscape

5.16 The neighbourhood area is not within or within proximity to a National Park, Area of Outstanding Natural Beauty, or any Green Belt land. In this context, the proposed site allocation through Policy BCD2 is not likely to adversely impact the integrity of any nationally protected landscapes.

5.17 At the local level, landscape and villagescape character play an important part in understanding the relationship between people and place, identifying recognisable and distinct patterns which make one area different from another. Landscape and villagescape character can assist in the assessment of the likely significance of effects of change resulting from new development areas, both in visual and amenity terms. An overview of the landscape and villagescape considerations for the proposed site allocation (and how these have been addressed through Neighbourhood Plan policy provisions) is provided below:

- The allocation would extend the village to the south and to the east. The relationship between the site, the properties along Simpson Way, Wilsummer Woods CWS, and the southern gateway in to the village (via Barrow Hill), are important considerations.

5.18 With respect to these sensitivities, it will be important for development to consider the key characteristics of the local landscape and the key features that contribute to the special qualities of the neighbourhood area. A key policy in this regard is Policy BCD2, which confirms that the site allocation should deliver enhanced landscaping and green infrastructure, alongside biodiversity and habitat creation. Additionally, Policy BCD5 confirms that the design of new development areas should have full regard to the rural character of the development site location and seek to preserve or enhance that character.

5.19 Any additional growth in the neighbourhood area will be non-strategic in scale and primarily focused within the defined settlement boundaries for the existing built-up area of Barrow and Burthorpe. This will ensure that there is a good relationship between new development and existing services and facilities and that the undeveloped rural countryside around Barrow cum Denham and Burthorpe is suitably preserved for appropriate countryside and other uses (see

Policy BCD1 and Policy BCD3). This will also help guide development to be in-keeping with the surrounding environment, reducing the visual impact of the development and respecting the important relationship between the built and natural environment.

Historic Environment

5.20 The Neighbourhood Plan has taken a proactive approach to protecting and enhancing the historic environment. With reference to the proposed site allocation (see Policy BCD2), the key heritage constraints and considerations for development proposals (and how these have been addressed through Neighbourhood Plan policy provisions) are identified as follows:

- There are nationally designated heritage assets (listed buildings along Barrow Hill) within proximity to the site, although these are likely screened from view by the existing built-up areas within the village boundary. Policy BCD11 confirms that proposals for new development which indirectly affect, but are proximate to, listed buildings or other heritage assets in Barrow and Denham, should provide a clear justification for the works, to ensure such development does not cause harm to their setting and should provide evidence that any impact of the proposed development is clearly outweighed by the public benefits.
- The site has a relatively high potential to contain undiscovered archaeological remains, with geophysical surveys and archaeological evaluations on land to the east and west of Barrow Hill recording Bronze Age features (including pottery fragments and animal bones), Roman tegula (roof tiles), and Medieval (late 12th - 13th century) remains. In this respect, **the SEA recommends** that new development proposals within the neighbourhood area should ensure that any archaeological finds (including details of their significance) are appropriately recorded in line with best practice guidance.

5.21 These sensitivities are further reflected by Neighbourhood Plan policies and proposals which focus on the conservation and enhancement of both designated and non-designated heritage assets, and their settings. Specifically, the design stipulations under Policy BCD2 and Policy BCD3 will guide new development proposals that may come forward during the plan period to respect their surroundings. They will also ensure development proposals work to improve the quality of the built environment through the consideration of materials to use, public realm improvements and appropriate building form. This will benefit the historic environment by ensuring new development does not detract from the historic character of the area or the setting of heritage features.

Land, Soil, and Water Resources

5.22 The site allocated under Policy BCD2 is a greenfield site which is likely underlain by Grade 2 'Very Good' agricultural land, which has a high likelihood of being some of the best and most versatile land for agricultural uses. As such, there is the potential for productive agricultural land loss through developing this site which cannot be mitigated. However, opportunities to meet housing needs purely through the redevelopment of brownfield land within the neighbourhood area are relatively limited. Nonetheless, Policy BCD3 supports

the principle of brownfield redevelopment at suitable locations which will help to encourage the most efficient use of land within the neighbourhood area.

- 5.23 Neighbourhood Plan policies also work to maintain and enhance land, soil, and water resources in the neighbourhood area. Key policies in this regard include Policy BCD2 and Policy BCD10 which aim to protect and expand green infrastructure networks and discourage proposals which would result in unacceptable levels of soil, air, water, or noise pollution. This will help to safeguard the natural environment within the neighbourhood area.
- 5.24 Concerning the protection of water resources, Policy BCD2 affirms that new development areas should incorporate sustainable urban drainage through design. This will indirectly contribute to water quality improvements through limiting suspended solids entering watercourses from surface water run-off. Additionally, the proposed site allocation does not contain any watercourses.
- 5.25 The Neighbourhood Plan also has a strong focus on protecting the open countryside from inappropriate levels of development. For example, several policies also seek to protect key features of landscape and biodiversity interest in the open countryside (see Policy BCD1 and Policy BCD3). While these policies do not specifically seek to address land, soil and water resources, the policies will indirectly help promote and protect these resources, including the promotion of high-quality green networks in the neighbourhood area and the protection and enhancement of key landscape and villagescape features. This will help support the capacity of the landscape and villagescape to regulate soil and water quality.

Population and Community

- 5.26 With reference to new housing, the Neighbourhood Plan allocates 'Land at Barrow Hill' for a maximum of 165 homes. The choice of site allocation has been informed by the various surveys and evidence base documents prepared to support the Neighbourhood Plan, responses from community consultation events, and the SEA findings. This is further discussed within **Chapter 4** of the Environmental Report, presented above.
- 5.27 More broadly with respect to housing provision, the Neighbourhood Plan also supports opportunities for small infill, or other brownfield redevelopments, to come forward for new homes within the defined village Settlement Boundaries of Barrow and Burthorpe. Such developments will be judged on their merits and will be expected to meet all of the relevant development criteria within Policy BCD3. Additionally, Policy BCD4 supports opportunities to deliver housing for specific demographics within the neighbourhood area which could benefit from additional provision (e.g., the elderly population, or vulnerable groups with protected characteristics). This will help to ensure that development is reflective of the needs of the community and is appropriate for its location.
- 5.28 A key aspect of the Neighbourhood Plan is to ensure that the provision of community facilities and recreation facilities continues to reflect the needs of a changing and increasingly diverse population, and that these facilities are accessible to all. Key policies in this respect include Policy BCD8 and Policy BCD9 which seek to protect and support the provision of local services and facilities to enable people to live locally. Development proposals which would

result in the loss of a key facility within the neighbourhood area will only be supported in the exceptional circumstances.

- 5.29 The Neighbourhood Plan also seeks to promote the economic vitality of the neighbourhood area and support employment opportunities, specifically through Policy BCD7. By protecting existing employment areas, supporting proposals to expand employment areas in suitable locations, and facilitating opportunities to work from home and support remote working, this will help to maintain and revitalise the local economy.

Health and Wellbeing

- 5.30 The quality of development is a key influence on the quality of life of residents. Neighbourhood Plan provisions primarily focus on ensuring that appropriate mitigation measures are incorporated to address any potential constraints to development, in addition to ensuring that new development is safe, attractive, inclusive, and accessible, incorporates an appropriate mix of new housing, and does not cause unnecessary noise and light pollution. Key policies in this regard include Policy BCD2 and Policy BCD5, with these stipulations also helping to improve the health and wellbeing of the community by encouraging active lifestyles.
- 5.31 The quality of housing will also be supported by Policy BCD6 which set out several provisions which seek to support energy efficient and low carbon development. This will help to address issues such as fuel poverty, which is important in the current economic climate given the rising costs of living. In this respect the Neighbourhood Plan will help facilitate the delivery of high quality and inclusive homes and neighbourhoods with the potential to promote the physical and mental health and wellbeing of residents.
- 5.32 More broadly, Neighbourhood Plan policies and proposals have a strong emphasis on delivering public realm improvements (including through green infrastructure provision). Green infrastructure provides space for recreation and relaxation, and access to nature has been evidenced to improve people's health and wellbeing, through encouraging healthy outdoor recreation and relaxation.

Transportation

- 5.33 Regarding connectivity and accessibility within the neighbourhood area, development proposals should encourage opportunities to help increase sustainability, connectivity, and accessibility (where possible). However, it is recognised that public transport options within the neighbourhood area are relatively limited in the absence of a train station and given the infrequent bus services. This is primarily due to the rurality of neighbourhood area. Nonetheless, opportunities to encourage active and sustainable transport options within the neighbourhood area (including through the design of new development areas) should be encouraged and enhanced wherever possible. This is a key aspiration of Policy BCD12.
- 5.34 With respect to the proposed site allocation through Policy BCD2, the site is accessible via a turning from Barrow Hill or via a turning from Denham Road. While some of these entry points might need to be widened and upgraded to accommodate additional traffic, this is likely to be possible at these locations.

The south-western portion of the site benefits from an extant outline planning permission which contains the proposed principal vehicular, pedestrian and cycle access into the site. Additionally, the policy confirms that proposals should help to facilitate walking and cycling opportunities in the neighbourhood area and contribute towards improving sustainable transport opportunities.

Conclusions at this current stage

- 5.35 In the context of the above, the assessment has concluded that the submission version of the Neighbourhood Plan is likely to have **long-term positive effects in relation to the ‘Population and Community’ and ‘Health and Wellbeing’ SEA themes**. This primarily links to the Neighbourhood Plan’s support for high-quality development proposals which would deliver suitable and appropriate housing for the local community (via a range of types and tenures), safeguard and improve the availability of services, facilities and amenities, and support opportunities for local employment. These policy provisions will support social inclusion, and community and economic vitality. The Neighbourhood Plan is also likely to facilitate improvements to the public realm (including through green infrastructure enhancements) and encourage healthy outdoor recreation and relaxation. These policy provisions will support the quality of life of residents.
- 5.36 The Neighbourhood Plan will also deliver **long-term positive effects in relation to the ‘Landscape’ and ‘Historic Environment’ SEA themes**. These benefits largely relate to the Neighbourhood Plan’s emphasis on protecting and enhancing the relationship between natural and built environment, protecting important landscape and heritage features, and facilitating improvements to the quality of the public realm. While the proposed site allocation is sensitive from a landscape and heritage perspective, it is considered that the neighbourhood plan policies provide a detailed overview of the proposed mitigation and enhancement measures which positively address the sensitivities. Nevertheless, **the SEA recommends** that new development proposals within the neighbourhood area should ensure that any archaeological finds (including details of their significance) are appropriately recorded in line with best practice guidance.
- 5.37 Additionally, **the Neighbourhood Plan will bring minor long-term positive effects in relation to the ‘Biodiversity and Geodiversity’ SEA theme** by encouraging proposals to protect existing and establish new habitats, enhance ecological networks (including through green infrastructure enhancements), and deliver net gains. Providing any recommendations within the HRA are incorporated into the submission version of the Neighbourhood Plan, it is anticipated that there would be no adverse effects to the integrity of these sites, either alone or in-combination with other plans and projects.
- 5.38 **Uncertain effects are considered likely in respect to climate change and flood risk**. The Neighbourhood Plan has the potential to lead to positive effects through supporting proposals that promote the inclusion of low carbon technologies and the use of local and traditional building materials, encourage sustainable and active travel, and proactively respond to the potential impacts of climate change through the implementation of appropriate drainage solutions. However, it is recognised that new development would lead to

inevitable increases in greenhouse gas emissions due to an increase in the built footprint of the neighbourhood area.

5.39 The plan also makes provision for transportation; encouraging proposals which would deliver new and enhanced public rights of way and improvements to the local transport network. This will allow for safe and active transportation around the neighbourhood area and better access to locations further afield. As such, **minor long term positive effects are anticipated for transportation** through the implementation of the Neighbourhood Plan.

5.40 It is expected the Neighbourhood Plan will bring forward **minor long term positive effects for land, soil, and water resources** in the neighbourhood area by incorporating several provisions will help support the capacity of the landscape to regulate soil and water quality. Whilst the proposed site allocation will potentially result in the permanent loss of areas of productive agricultural land, opportunities to meet housing needs purely through the redevelopment of brownfield land within the neighbourhood area are relatively limited.

6. What are the next steps?

Next steps

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

Monitoring

- 6.3 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.
- 6.4 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by West Suffolk Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the Neighbourhood Plan that would warrant more stringent monitoring over and above that already undertaken by West Suffolk Council.

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