

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

Environmental Report

Bentley Parish Council

February 2021

## Quality information

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## Revision History

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V3	Feb 2021	Final draft for Locality review	Rosie Cox	Environmental Planner
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# Non-Technical Summary (NTS)

## Introduction

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Bentley Neighbourhood Development Plan.

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the Bentley Neighbourhood Plan is a legal requirement.<sup>1</sup> This is a Non-Technical Summary (NTS) of the SEA Environmental Report.

The Bentley Neighbourhood Plan is being prepared by the Parish Council in the context of the adopted Babergh Local Plan (2006), and the emerging Babergh and Mid Suffolk Joint Local Plan.

Once 'made' the Neighbourhood Plan will have material weight when deciding on planning applications, alongside the Babergh Local Development Framework.

The Neighbourhood Plan is at an advanced stage of preparation, with the SEA Environmental Report, including this NTS, accompanying the Submission version of the Neighbourhood Plan.

## Structure of the Environmental Report/ this NTS

SEA reporting essentially involves answering the following questions in turn:

1) What has plan-making / SEA involved **up to this point?**

- including in relation to 'reasonable alternatives'.

2) What are the SEA findings **at this stage?**

- i.e. in relation to the draft plan.

3) What happens **next?**

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

## What is the Plan seeking to achieve?

The Bentley Neighbourhood Plan has a clear vision to "*conserve the sense of community within Bentley, to ensure that we have the robustness to meet the challenges ahead - to enhance our rural nature and agricultural surroundings, for a safe and vibrant place to live for generations to come.*" To achieve this vision, the following nine objectives have been identified, across six themes:

### **Housing**

1. To encourage the development of appropriate housing for the stated needs of the village, in terms of size and style and across the age demographic.

### **Built Environment**

2. To maintain and enhance a strong rural identity and sense of place for the parish, through environmentally sustainable and sensitive small-scale development.
3. To ensure new development is designed to reflect local character and incorporates measures that reduces environmental impact.

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

### **Natural Environment**

4. To retain, encourage, and enhance local natural habitats, to conserve Priority Species and increase biodiversity, and to maintain the strong sense of rural place within the parish. To enhance habitat connectivity (wildlife corridors) to allow species to move into and across these habitats.
5. To have regard for our duty of care to the Suffolk Coasts and Heaths Area of Outstanding Natural Beauty within the parish and its setting, and to protect its special qualities, particularly tranquillity and large skies in a rural landscape.

### **Historic Environment**

6. To conserve and enhance our heritage assets

### **Development of Infrastructure and Services**

7. To encourage safe and sustainable options for travel in and around the village for pedestrians, cyclists, and horse riders.
8. To support the creation of infrastructure, such as fast broadband and transport links that allow commuting via public transport, to encourage a broad age spectrum within the village.

### **Community Facilities**

9. To conserve and enhance the sense of robust, resilient, vibrant community within the village, maintaining the village as a safe and desirable place to live for all its residents.

## **What is the scope of the SEA?**

The scope of the SEA is reflected in a list of themes, objectives, and assessment questions, which, taken together indicate the parameters of the SEA and provide a methodological ‘framework’ for assessment. A summary framework is presented below, and a full framework which includes assessment questions is provided within the main Environmental Report (see **Table 3.2**).

<b>SEA theme</b>	<b>SEA objective</b>
Biodiversity	Protect and enhance biodiversity and geodiversity sites and features, by avoiding impacts on the integrity of European designated sites and delivering demonstrable biodiversity net gains locally.
Climate change	Reduce the contribution to climate change made by activities within the Neighbourhood Plan area.
	Support the resilience of the Neighbourhood Plan Area to the potential effects of climate change, including flooding
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape, including the AONB and its setting.
Historic environment	Protect, conserve and enhance the historic environment within and surrounding the Neighbourhood Plan area
Land, soil and water resources	Ensure the efficient and effective use of land.
	Protect and enhance water quality and use and manage water resources in a sustainable manner.

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Population and community	Ensure growth in the Parish is aligned with the needs of all residents and capacity of the settlement and social infrastructure, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.
Health and wellbeing	Improve the health and wellbeing of residents within the Neighbourhood Plan area.
Transportation	Promote sustainable transport use and active travel opportunities and reduce the need to travel.

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## Plan-making/ SEA up to this point

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

As such, Part 1 of the Environmental Report explains how work was undertaken to develop and assess a 'reasonable' range of alternative approaches to the allocation of land for housing, or alternative sites.

Specifically, Part 1 of the report -

- 1) explains the process of establishing the reasonable alternatives;
- 2) presents the outcomes of assessing the reasonable alternatives; and
- 3) explains reasons for establishing the preferred option, in light of the assessment.

The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing, given the following considerations:

- Bentley NP objectives, particularly the core objective to understand housing needs and allocate sites for development;
- Housing growth is known to be a matter of key interest amongst residents and other stakeholders; and
- The delivery of new homes is most likely to have a significant effect compared to the other proposals within the Plan. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

## Establishing the reasonable alternatives

The Environmental Report explains how reasonable alternatives were established subsequent to process of considering the strategic policy context ('top down' factors) and the site options in contention for allocation ('bottom-up' factors).

This work identified four site options with the potential to deliver growth within Bentley. These options as listed below are depicted in **Figure 5.1** of the Environmental Report, and form the alternative options for appraisal;

- **Option A:** Land south of Station Road and west of Bergholt Road.
- **Option B:** Land west of Church Lane
- **Option C:** Land east of Bergholt Road
- **Option D:** Land east of Capel Road

## Assessing the reasonable alternatives

The table below presents summary findings for the assessment of these options, with detailed findings presented in **Chapter 6** of the Environmental Report.

SEA theme		Option A	Option B	Option C	Option D
Biodiversity	Likely effect	Neutral	Neutral	Neutral	Neutral
	Rank	3	2	2	1
Climate change	Likely effect	Neutral	Uncertain	Neutral	Neutral
	Rank	3	4	2	1
Landscape	Likely effect	Significant negative	Minor negative	Minor negative	Minor negative
	Rank	4	3	2	1
Historic environment	Likely effect	Uncertain	Minor negative	Neutral	Neutral
	Rank	2	3	1	1
Land, soil and water resources	Likely effect	Significant negative	Minor negative	Minor negative	Minor negative
	Rank	3	2	2	1
Population and communities	Likely effect	Significant positive	Minor positive	Minor positive	Minor positive
	Rank	1	3	2	2
Health and wellbeing	Likely effect	Neutral	Neutral	Neutral	Neutral
	Rank	3	2	3	1
Transportation	Likely effect	Minor negative	Minor negative	Minor negative	Minor negative
	Rank	2	3	2	1

### Summary:

Overall, Option A is the only option considered for its potential to lead to significant negative effects in relation to the SEA themes of landscape and land, soil and water resources. The effects relate to the potential loss of around 4ha of high-quality agricultural land and the encroachment of the urban area within the setting of the AONB. However, considering economies of scale, Option A is also has the potential for significant positive effects in relation to the SEA theme of population and communities through the potential to deliver more affordable homes and supporting infrastructure.

In terms of the ranking of options, Option D performs notably well across most SEA themes, particularly as a result of the utilisation of small areas of brownfield land (redundant agricultural buildings) and the avoidance of flood risk and effects in relation to the historic environment. Option D also connects well to the existing PRoW network, with opportunities to support new residents with good access to recreational and active travel routes.

Aside from Option A, Options B-D broadly perform on par in terms of likely effects, and minor negative effects are anticipated under all options in relation to the landscape, land, soil and water resources, and transportation themes. This predominantly reflects a loss of greenfield land and the subsequent effects on landscape character. However, a lack of brownfield alternatives is noted. Furthermore, Option B is noted for additional potential minor negative effects which relate to known archaeological resources at the site.

## Developing the preferred approach

The Parish Council's reasons for developing the preferred approach (Option D) in light of the alternatives assessment are identified below:

*The Parish Council supports Option D, namely allocation of the site at the Fruit Farm, Capel Road for around 15 dwellings.*

*It does not support any other potential site; in particular, the loss of visual amenity if Option B were to be developed would be a severe blow to the character of the village.*

*The Parish Council recognises that some negative impact on the landscape could result from the loss of boundary planting on Capel Road (Option D) and that an allocation should seek to minimise any loss and compensate for this loss through replacement planting at the rear of the visibility splays to the vehicular access.*

## Assessment findings at this stage

Part 2 of the Environmental Report presents an assessment of the Submission version of the Bentley Neighbourhood Plan. Assessment findings are presented as a series of narratives under the 'SEA framework' topic headings. The following conclusions are reached:

Overall, the assessment has determined that the current version of the Bentley Neighbourhood Plan is likely to lead to predominately positive effects. **Significant long-term positive effects** are anticipated in relation to population and communities and health and wellbeing through supporting sustainable growth of the community and healthy lifestyles. The Neighbourhood Plan seeks to deliver housing to meet local needs; and ensures the type of housing being developed is likely to support the needs of all sectors of the local community. Further to this the Neighbourhood Plan supports the vitality and viability of the Neighbourhood area through the protection and enhancement of the high-quality public realm, community infrastructure, and access to local services (including health services).

**Minor positive effects** are predicted for biodiversity and climate change given the Neighbourhood Plan policy framework sets out a number of requirements which support local and national climate change objectives/ targets. Notably the premise for biodiversity protection, enhancement, and net gain embedded through the Neighbourhood Plan policy framework will lead to positive effects directly and indirectly for biodiversity and climate change respectively.

**Neutral effects** are anticipated in relation to the landscape and historic environment SEA themes. Proposed growth in the parish has been underpinned by evidence to ensure development maintain and where possible enhance Bentley's historic assets, landscape features and local villagescape; and maintain the characteristic rural setting of the AONB.

**Neutral effects** are also anticipated in relation to the transportation theme. Any adverse effects at Station/ Capel road are anticipated to be suitably mitigated, and the plan sets out support for local transport improvements, green infrastructure gains, and possible reduced car use.

**Minor negative effects** are predicted in relation to land, soil and water resources given proposed site allocations will result in the loss of greenfield, BMV agricultural land (although it is noted that development at Land at Oakleigh would take place with or without the Neighbourhood Plan). It is however noted that the effects in relation to agricultural land resources are **uncertain** until site-level assessments can determine precise soil quality at the site. Furthermore, these effects are considered likely under any growth scenario or alternative site options, given a lack of available options within areas of brownfield or lower quality agricultural land.

## Cumulative effects

Cumulatively the Bentley NP seeks to complement the provisions of the emerging Joint Local Plan by; allocating land to meet residual housing needs, seeking development proposals which contribute to the locally required mix of housing types and tenures, and supporting delivery of high-quality development which complements its setting, settlement form and village identity.



The growth proposed through the NDP may slightly exceed that currently planned for in the emerging Joint Local Plan which could increase the cumulative recreational pressures placed on internationally designated biodiversity. However, the provisions of the Suffolk Coast RAMS should ensure that cumulative effects are not significant.

It is recognised that cumulatively, growth across the district will occur within the setting of the AONB. The supplementary evidence provided through the Bentley NP in relation to design principles and masterplanning in Bentley is likely to cumulatively support the AONB and its Management Plan aims to protect the integrity and special qualities of the nationally valued landscape.

Cumulative positive effects are therefore anticipated overall.

## Recommendations

Following initial assessment of the Neighbourhood Plan, it was recommended that the site allocations policies (BEN3 and BEN4) be revised to consider the landscape, historic environment, and transport implications of new development. Specifically, it was recommended that the supporting text requirement for *“all existing mature trees along the Capel Road frontage and the site boundary planting shall be retained”*, should be moved into policy. Given the accessibility issues at Capel Road, the policy requirement could be adjusted to *“retain trees where possible and deliver suitable replantation where access provision is made, and retention is not possible”* to increase the weight of the requirement and strengthen the policy framework overall. This recommendation has now been incorporated into the Plan.

## Next steps

Part 3 of the report explains the next steps that will be taken as part of plan-making and SEA.

## Plan finalisation

Following submission, the plan and supporting evidence will be published for further consultation, and then subjected to 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 the Local Plan.

Assuming that the examination leads to a favourable outcome, the Neighbourhood Plan will then be subject to a referendum, organised by Babergh District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be ‘made’. Once ‘made’, the Bentley Neighbourhood Plan will become part of the Development Plan for Babergh District, covering the defined Neighbourhood Plan area.

## 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 Babergh District 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 Bentley NP that would warrant more stringent monitoring over and above that already undertaken by Babergh District Council.

# 1. Introduction

## Background

- 1.1 AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Bentley Neighbourhood Plan (NP).
- 1.2 The NP is being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012 and in the context of the adopted Babergh Local Plan (2006), and the emerging Babergh and Mid Suffolk Joint Local Plan.
- 1.3 Once 'made' the Bentley NP will have material weight when deciding on planning applications, alongside the Babergh Local Development Framework.
- 1.4 SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the Bentley NP is a legal requirement.<sup>2</sup>

## SEA explained

- 1.5 It is a requirement that SEA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on SEA.
- 1.6 In-line with the Regulations, a report (known as the Environmental Report) must be published for consultation alongside the draft plan that "*identifies, describes and evaluates*" the likely significant effects of implementing "*the plan, and reasonable alternatives*".<sup>3</sup> The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.7 More specifically, the Report must answer the following three questions:
  10. What has plan-making / SEA involved up to this point?
    - including in relation to 'reasonable alternatives'.
  11. What are the SEA findings at this stage?
    - i.e. in relation to the draft plan.
  12. What happens next?

## This Environmental Report

- 1.8 This report is the Environmental Report for the Bentley NP. It is published alongside the 'Submission' version of the plan, under Regulation 16 of the Neighbourhood Planning Regulations (2012, as amended).
- 1.9 This report essentially answers questions 1, 2 and 3 in turn, to provide the required information.<sup>4</sup> Each question is answered within a discrete 'part' of the report.
- 1.10 However, before answering Q1, two initial questions are answered to further set the scene; what is the plan seeking to achieve? And what is the scope of the SEA?

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<sup>2</sup> Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations ('the SEA Regulations'). The CNP was subject to formal screening in 2020.

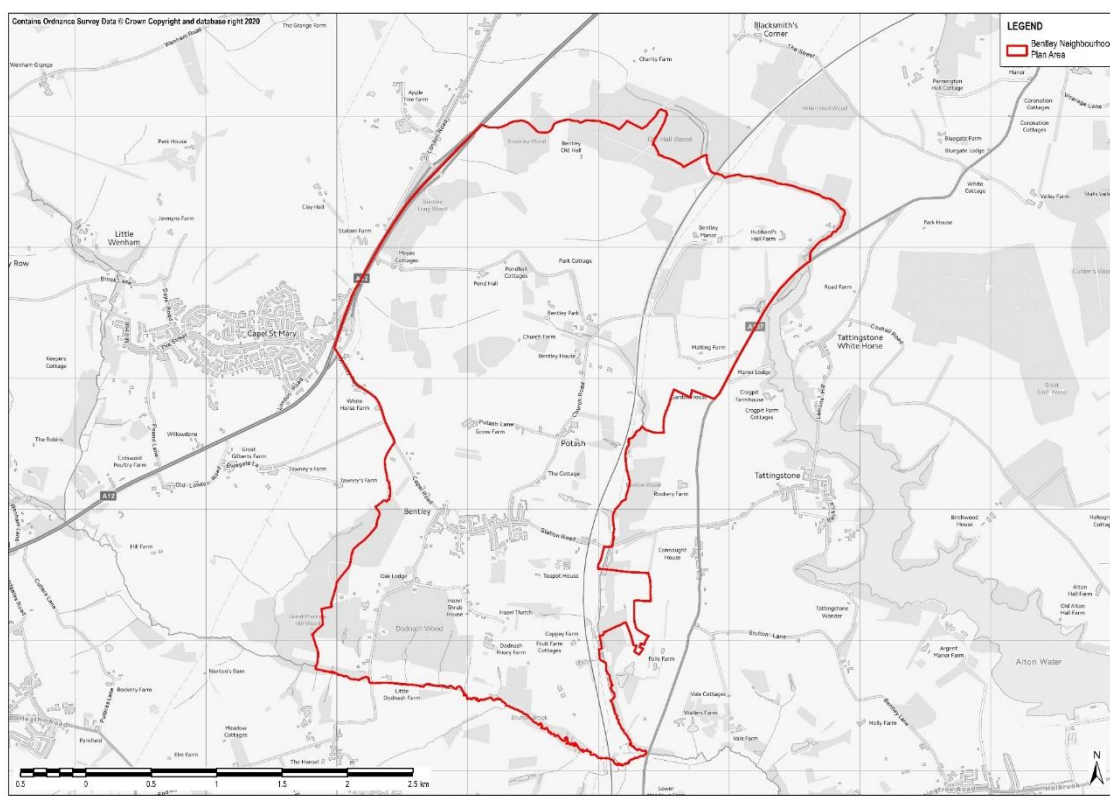
<sup>3</sup> Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

<sup>4</sup> See **Appendix A** for further explanation of the regulatory basis for answering certain questions within the Environmental Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

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

### Introduction

- 2.1 This section considers the strategic planning policy context provided adopted Babergh Local Plan (2006) and the emerging Babergh and Mid Suffolk Joint Local Plan, before then presenting the Neighbourhood Plan vision and objectives. **Figure 2.1** below presents the Plan area.



**Figure 2.1 Bentley Neighbourhood Plan area**

### Strategic planning policy context

- 2.2 As previously identified, the Bentley NP is being prepared in the context of the adopted Babergh Development Plan and the emerging Babergh and Mid Suffolk Joint Local Plan. The adopted Development Plan comprises the following key documents:
- Saved policies from the Babergh Local Plan Alteration No.2 (2006)
  - Babergh Core Strategy (2014)
  - Suffolk Minerals and Waste Local Plan (SMWLP) (2020)
- 2.3 The emerging Babergh and Mid Suffolk Joint Local Plan will provide a framework for development to 2036 and will replace the saved policies of the adopted 2006 Local Plan and the adopted Babergh Core Strategy. Minerals and waste planning will continue to be the responsibility of Suffolk County Council.
- 2.4 The Bentley NP must be in general conformity with the strategic policies of the Development Plan, as per footnote 16 of the National Planning Policy Framework (NPPF) (2019). Additionally, the NPPF states that *“local planning authorities may give weight to relevant policies in emerging plans”* according to set criteria which includes its stage of preparation. The emerging Joint Local Plan is at a later plan stage, with consultation on a ‘Pre-Submission’ version of the Plan during November and December 2020. The Joint Local Development

- Scheme (July 2020) identifies that following this consultation, submission of the Joint Local Plan is anticipated early in 2021.
- 2.5 The settlement hierarchy set out in the adopted Core Strategy identifies Bentley as a ‘hinterland village’ within the ‘functional cluster’ of Capel St Mary and near Ipswich; the main service centre for employment, retail and services.
- 2.6 The emerging Joint Local Plan continues to categorise Bentley as a ‘Hinterland Village’ where the scale and location of development will depend upon the role of settlement in the settlement hierarchy as well as “*the spatial distribution, the capacity of existing physical and social infrastructure or new/ enhanced infrastructure, as well as having regard to the natural, built and historic environment.*” The Plan identifies a settlement boundary around Bentley “*in order to demonstrate the extent of land which is required to meet the development needs of the Plan*” and Policy LS01 allocates the ‘Land West of Church Lane’ (within the defined settlement boundary) for the development of 20 new homes.
- 2.7 Further, the Place Maps and Policies of Part 3 of the emerging Local Plan identify key landscape values attributed with Bentley. This includes Ancient Estate Farmlands, Ancient Estate Claylands, Rolling Valley Farmlands and Ancient Woodland in the immediate surrounds of the settlement, as well as the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) in the south and south-west. Bentley also falls within the Suffolk Coast Recreation disturbance Avoidance & Mitigation Strategy’s (RAMS) 13km Zone of Influence where contributions will be sought for all developments proposing the delivery of new dwellings.

## Housing numbers

- 2.8 The emerging Joint Local Plan (Pre-Submission draft November 2020) identifies that there are 32 dwellings with outstanding planning permission granted as of 1<sup>st</sup> April 2018 in Bentley contributing to a total requirement for an additional 52 homes in the period up to March 2037.
- 2.9 This leaves a need to identify how at least 20 additional dwellings will be delivered to satisfy the requirement for 52 homes in the period up to March 2037. Policy LS01 of the emerging Joint Local Plan, which allocates the ‘Land West of Church Lane’ for 20 homes could meet this residual need.

## Bentley Neighbourhood Plan vision statement and objectives

- 2.10 The following vision has been established for the Bentley Neighbourhood Plan:

*“Our vision is to conserve the sense of community within Bentley, to ensure that we have the robustness to meet the challenges ahead - to enhance our rural nature and agricultural surroundings, for a safe and vibrant place to live for generations to come.”*

- 2.11 To achieve this vision, nine objectives have been identified across six themes:

### **Housing**

1. To encourage the development of appropriate housing for the stated needs of the village, in terms of size and style and across the age demographic.

### **Built Environment**

2. To maintain and enhance a strong rural identity and sense of place for the parish, through environmentally sustainable and sensitive small-scale development.
3. To ensure new development is designed to reflect local character and incorporates measures that reduces environmental impact.

### **Natural Environment**

4. To retain, encourage, and enhance local natural habitats, to conserve Priority Species and increase biodiversity, and to maintain the strong sense of rural place within the parish. To enhance habitat connectivity (wildlife corridors) to allow species to move into and across these habitats.
5. To have regard for our duty of care to the Suffolk Coasts and Heaths Area of Outstanding Natural Beauty within the parish and its setting, and to protect its special qualities, particularly tranquillity and large skies in a rural landscape.

#### ***Historic Environment***

6. To conserve and enhance our heritage assets

#### ***Development of Infrastructure and Services***

7. To encourage safe and sustainable options for travel in and around the village for pedestrians, cyclists, and horse riders.
8. To support the creation of infrastructure, such as fast broadband and transport links that allow commuting via public transport, to encourage a broad age spectrum within the village.

#### ***Community Facilities***

9. To conserve and enhance the sense of robust, resilient, vibrant community within the village, maintaining the village as a safe and desirable place to live for all its residents.

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

### Introduction

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

### Consultation

- 3.2 The SEA Regulations require that “*when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.<sup>5</sup> As such, these authorities were consulted in December 2020. No response was received from the Environment Agency. The responses received from Natural England and Historic England are detailed in **Table 3.1** below.

**Table 3.1: Scoping consultation responses**

Scoping Consultation Response	SEA update/ response
<p><b>Natural England</b>  <b>Dawn Kinrade, Consultations Team</b></p> <p>Thank you for your consultation on the above dated 11 December 2020. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p><b>Natural England has no specific comments to make on this neighbourhood plan SEA scoping.</b></p>	<p>Many thanks for your review and response.</p>
<p><b>Historic England</b>  <b>Edward James, Historic Places Advisor</b></p> <p>Thank you for your email requesting a scoping opinion for the Bentley Neighbourhood Plan SEA.</p> <p>We would refer you to the advice in Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment, which can be found here: <a href="https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/">https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/</a>. This advice sets out the historic environment factors which need to be considered during the Strategic Environmental Assessment or Sustainability Appraisal process, and our recommendations for information you should include.</p> <p>We would also refer you to Historic England Advice Note 3: Site Allocations and Local Plans. This advice note sets out what we consider to be a robust process for assessing the potential impact of site allocations on any relevant heritage assets. In particular we would highlight the Site Selection Methodology set out on Page 5. This is similar to the methodology used to assess potential impacts on the setting of heritage assets (Good Practice Advice 3) but is focused specifically on the site allocation process.</p> <p>We would expect a proportionate assessment based on this methodology to be undertaken for any site allocation where there was a potential impact, either positive or negative, on a heritage asset, and the SEA consequently to advise on how any harm should be minimised or mitigated, and about</p>	<p>Many thanks for your review and response.</p> <p>Noted with thanks, Advice Note 8 has been considered and reviewing in the policy context of the ‘historic environment’ theme.</p> <p>Noted with thanks, Advice Note 3 has been considered and reviewing in the policy context of the ‘historic environment’ theme.</p>

<sup>5</sup> These consultation bodies were selected “*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes*” (SEA Directive, Article 6(3)).

## Scoping Consultation Response

## SEA update/ response

opportunities for enhancement. Advice Note 3 can be found here: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

We note that our response to the Screening suggested that an SEA would not in our view be necessary from the perspective of any potential significant effects on the historic environment, but we are nonetheless please to see the inclusion of Section 6 and consider that the information referenced is likely to be proportionate in this case.

Noted, with thanks.

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.

Noted, with thanks.

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.

Noted, with thanks.

## The SEA framework

3.3 The SEA scope is summarised in a list of themes, objectives and assessment questions, known as the SEA framework. **Table 3.2** presents the SEA framework as broadly agreed in 2020.

**Table 3.2: SEA framework**

SEA theme	SEA objective	Assessment questions (will the proposal help to...)
Biodiversity	Protect and enhance biodiversity and geodiversity sites and features, by avoiding impacts on the integrity of European designated sites and delivering demonstrable biodiversity net gains locally.	<ul style="list-style-type: none"> <li>Protect and enhance European, Nationally and locally designated sites, including supporting habitats and mobile species that are important to the integrity of these sites?</li> <li>Protect and enhance priority habitats and species and the areas that support them, such as ancient woodland?</li> <li>Achieve a net gain in biodiversity?</li> <li>Support enhancements to multifunctional green infrastructure networks?</li> <li>Support access to, interpretation and understanding of biodiversity and geodiversity?</li> </ul>
Climate change	Reduce the contribution to climate change made by activities within the Neighbourhood Plan area	<ul style="list-style-type: none"> <li>Reduce the number of journeys made by polluting vehicles?</li> <li>Promote the use of sustainable modes of transport including walking, cycling and public transport?</li> <li>Increase the number of new developments meeting or exceeding sustainable design criteria?</li> <li>Generate energy from low or zero carbon sources?</li> <li>Reduce energy consumption from non-renewable resources?</li> </ul>
	Support the resilience of the Neighbourhood Plan	<ul style="list-style-type: none"> <li>Avoid development in areas at risk of flooding, considering the likely future effects of climate change?</li> </ul>

SEA theme	SEA objective	Assessment questions (will the proposal help to...)
	Area to the potential effects of climate change, including flooding	<ul style="list-style-type: none"> <li>• Ensure that inappropriate development does not take place in areas at higher risk of flooding, considering the likely future effects of climate change?</li> <li>• Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change?</li> <li>• Sustainably manage water runoff, reducing surface water runoff (either within the plan area or downstream)?</li> <li>• Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan Area?</li> <li>• Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?</li> </ul>
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape, including the AONB and its setting.	<ul style="list-style-type: none"> <li>• Protect and enhance the setting of the AONB?</li> <li>• Preserve the integrity of the national and local landscape character areas covering the Neighbourhood Plan area?</li> <li>• Conserve and enhance local diversity and character?</li> <li>• Protect locally important viewpoints contributing to the sense of place and the visual amenity of the Neighbourhood Plan area?</li> <li>• Retain and enhance landscape features that contribute to the rural setting, including trees and hedgerow.</li> </ul>
Historic environment	Protect, conserve and enhance the historic environment within and surrounding the Neighbourhood Plan area	<ul style="list-style-type: none"> <li>• Conserve and enhance buildings and structures of architectural or historic interest, both designated and non-designated, and their setting?</li> <li>• Conserve and enhance the special interest, character and appearance of locally important features and their settings?</li> <li>• Support the integrity of the historic setting of key monuments of cultural heritage interest as listed on the Suffolk HER?</li> <li>• Support access to, interpretation and understanding of the historic evolution and character of the environment?</li> <li>• Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies?</li> </ul>
Land, soil and water resources	Ensure the efficient and effective use of land.	<ul style="list-style-type: none"> <li>• Avoid the loss of high-quality agricultural land resources?</li> <li>• Avoid the unnecessary sterilisation of, or hindering of access to mineral resources in the Plan area?</li> <li>• Promote the use of previously developed land, vacant &amp; derelict brownfield land opportunities?</li> </ul>
	Protect and enhance water quality and use and manage water resources in a sustainable manner.	<ul style="list-style-type: none"> <li>• Support improvements to water quality?</li> <li>• Ensure the timely provision of wastewater infrastructure?</li> <li>• Ensure appropriate drainage and mitigation is delivered alongside development?</li> </ul>



SEA theme	SEA objective	Assessment questions (will the proposal help to...)
		<ul style="list-style-type: none"> <li>• Protect groundwater and surface water resources from pollution?</li> <li>• Maximise water efficiency and opportunities for water harvesting and/ or water recycling?</li> </ul>
Population and communities	Ensure growth in the Parish is aligned with the needs of all residents and capacity of the settlement and social infrastructure, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.	<ul style="list-style-type: none"> <li>• Provide everyone with the opportunity to live in good quality, and affordable housing?</li> <li>• Support the provision of a range of house types and sizes?</li> <li>• Meet the needs of all sectors of the community?</li> <li>• Provide flexible and adaptable homes that meet people's needs, particularly the needs of an ageing population?</li> <li>• Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people?</li> <li>• Encourage and promote social cohesion and active involvement of local people in community activities?</li> <li>• Promote the use of sustainable building techniques, including use of sustainable building materials in construction?</li> <li>• Minimise fuel poverty?</li> <li>• Maintain or enhance the quality of life of existing local residents?</li> <li>• Support the provision of land for allotments and cemeteries?</li> </ul>
Health and wellbeing	Improve the health and wellbeing of residents within the Neighbourhood Plan Area.	<ul style="list-style-type: none"> <li>• Promote accessibility to a range of leisure, health and community facilities, for all age groups?</li> <li>• Provide and enhance community access to open green spaces?</li> <li>• Promote the use of healthier modes of travel, including active travel networks?</li> <li>• Improve access to the countryside for recreational use?</li> <li>• Avoiding any negative impacts to the quality and extent of existing recreational assets, such as formal or informal footpaths?</li> </ul>
Transportation	Promote sustainable transport use and reduce the need to travel.	<ul style="list-style-type: none"> <li>• Support the key objectives within the Suffolk Local Transport Plan to encourage more sustainable transport?</li> <li>• Enable sustainable transport infrastructure enhancements?</li> <li>• Ensure sufficient road capacity to accommodate new development?</li> <li>• Promote improved local connectivity and pedestrian and cyclist movement?</li> <li>• Facilitate on-going high levels of home and remote working?</li> <li>• Improve road safety?</li> <li>• Reduce the impact on residents from the road network?</li> <li>• Improve parking facilities?</li> </ul>

**Part 1: What has plan-  
making/ SEA involved  
to this point?**

## 4. Introduction (to Part 1)

### Overview

- 4.1 Whilst work on the 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.
- 4.2 More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to addressing a particular issue that is of central importance to the Plan, namely the allocation of land for housing, or alternative sites. Land is currently being identified to deliver against residual housing needs and meet the overall Local Plan requirement to deliver 52 dwellings in the period up to March 2037.

### Why focus on sites?

- 4.3 The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing, given the following considerations:
- Bentley NP objectives, particularly the core objective to understand housing needs and allocate sites for development;
  - Housing growth is known to be a matter of key interest amongst residents and other stakeholders; and
  - The delivery of new homes is most likely to have a significant effect compared to the other proposals within the Plan. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

### Structure of this part of the report

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

## 5. Establishing reasonable alternatives

### Introduction

- 5.1 The aim here is to explain the process that led to the establishment of alternative sites and thereby present “*an outline of the reasons for selecting the alternatives dealt with*”.<sup>6</sup>
- 5.2 Specifically, there is a need to explain the strategic parameters that have a bearing on the establishment of options (in relation to the level and distribution of growth) and the work that has been undertaken to date to examine site options (i.e. sites potentially in contention for allocation in the Bentley NP). These parameters are then drawn together in order to arrive at ‘reasonable alternatives’.

### Strategic parameters

- 5.3 The adopted Babergh Core Strategy (2014) identifies Bentley has a ‘Hinterland Village’ where development will be accommodated according to local housing needs, as well as the role and capacity of the settlement in terms of provisions and infrastructure. No allocations are made in the Core Strategy that would have a bearing on growth options in the NDP at this current time.
- 5.4 Whilst the strategic directions of the emerging Babergh and Mid-Suffolk Joint Local Plan continue to identify Bentley as a ‘Hinterland Village’, Policy SP04 of the Regulation 19 ‘Pre-Submission’ Draft (November 2020) directs 9% of the proposed growth between 2018 and 2037 towards Babergh Hinterland Villages.
- 5.5 Table 04 continues from Policy SP04 to identify minimum housing requirements for Neighbourhood Plan areas. The Table identifies that there are 32 dwellings with outstanding planning permission since April 2018, which contribute to a total requirement for an additional 52 homes in Bentley in the period April 2018 to March 2037. This leaves a residual requirement for land to deliver an additional 20 homes. Policy LS01 allocates the ‘Land West of Church Lane’ to meet this residual requirement.
- 5.6 At this current stage, it is recognised that collaboratively, the Parish Council and Local Planning Authority are revisiting and revising the outstanding planning permissions to date, and there is some uncertainty in relation to the amount of development that will contribute towards the target for 52 homes in the period up to March 2037.
- 5.7 The Draft Bentley NP identifies additional planning permissions in the period between April 2018 and August 2020 that equate to a total contribution of 43 dwellings in the period up to March 2037. This would leave a residual requirement for 9 homes to meet the identified need for a total of 52 homes. At this stage it is recognised that the residual need will fall between 9 and 20 homes; which ultimately remains a relatively ‘low growth’ scenario.
- 5.8 Whilst uncertainty remains around the commitments and completions to date, and therefore the residual housing needs to be met through the Bentley NP allocations, the Bentley NP does recognise a strategic need to deliver a minimum of 9 homes over the Plan period. In doing so, and considered alongside local community preferences, the Plan also recognises the potential for an alternative site to that proposed in the Regulation 19 ‘Pre-Submission’ Draft of the emerging Joint Local Plan to meet these needs.

### Affordable housing needs

- 5.9 The Bentley Neighbourhood Plan Housing Needs Assessment (AECOM, 2020) identified that a total of 18 affordable homes would be required over the Plan period. It is anticipated that the developments on the Oakleigh and Fruit Farm sites (as allocated within the Regulation 14 draft Bentley NP) would provide approximately 10 affordable homes in line with NPPF (2019) defined requirement of 35%. As a result, there is likely to be a shortfall in provision of affordable

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<sup>6</sup> Schedule 2(8) of the SEA Regulations.

housing over the Plan period and the potential for a higher growth scenario to address this need is recognised.

## Site options

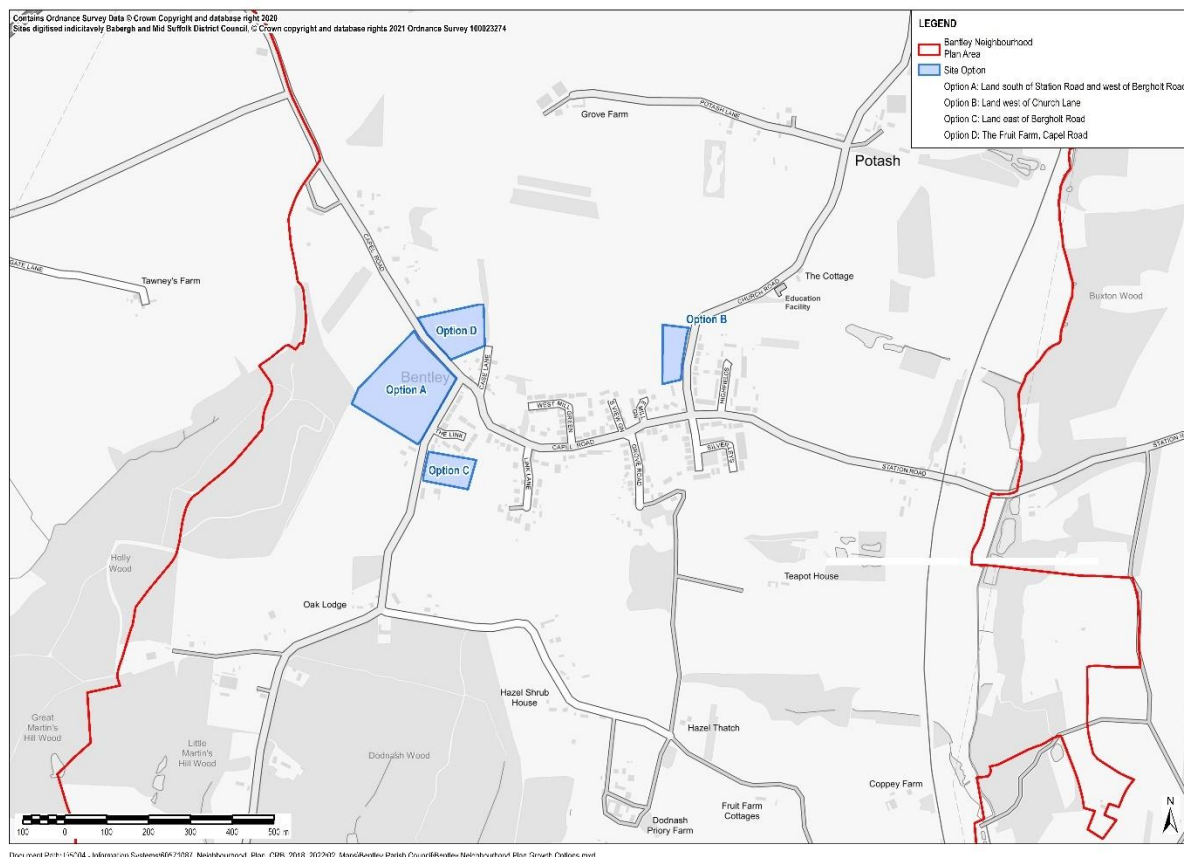
5.10 The Babergh and Mid-Suffolk Strategic Housing and Economic Land Availability Assessment (SHELAA) October 2020 is the most up to date evidence in relation to land availability in Bentley. This identifies four available sites as follows:

- Land south of Station Road and west of Bergholt Road. A 4ha greenfield site in agricultural use with the potential to yield up to 60 homes.
- Land west of Church Lane. A 0.5ha greenfield site in agricultural use with the potential to yield up to 20 homes.
- Land east of Bergholt Road. A 0.84ha greenfield site currently used as paddocks with the potential to yield up to 20 homes.
- Land east of Capel Road. A roughly 6.25ha predominantly greenfield site that was discounted in the SHELAA for its poor connectivity to the existing settlement area.

5.11 However, the 'Land east of Capel Road' has been resubmitted with a reduced development area of 0.74ha focused at the existing 'Fruit Farm'. The development area focused east of Capel Road and north of Case Lane is being reconsidered for its potential to integrate with the settlement form and yield up to 16 new homes.

5.12 The sites (including the updated 'Fruit Farm' site) are identified in **Figure 5.1**.

**Figure 5.1 Available sites in Bentley**



## Establishing reasonable alternatives

5.13 Considering the parameters discussed above, the four available sites form the basis for four 'alternative' options for growth in Bentley as follows:

- 5.14 **Option A:** A higher growth option which progresses the ‘**Land south of Station Road and west of Bergholt Road**’ to deliver significantly more development than required to meet residual needs (c. 60 homes). This higher growth option is explored for its potential to deliver against residual affordable housing needs identified in the Parish.
- 5.15 **Option B:** A medium growth option which progresses the ‘**Land west of Church Lane**’ in line with the identified provisions of the emerging Joint Local Plan (c. 20 homes).
- 5.16 **Option C:** A medium growth option which progresses the ‘**Land east of Bergholt Road**’ to deliver more than the need identified through the Bentley NP, but in line with the latest iteration of the emerging Joint Local Plan (c. 20 homes).
- 5.17 **Option D:** A lower growth option which progresses the ‘**Fruit Farm**’ site east of Capel Road (c. 16 homes). Whilst a lower growth option, it will still meet and exceed the residual need identified through the Bentley NP.

## 6. Assessing the reasonable alternatives

- 6.1 This chapter provides the assessment of the four alternative options identified for appraisal (established in the previous chapter). The options are as follows:
- **Option A:** Land south of Station Road and west of Bergholt Road
  - **Option B:** Land west of Church Lane
  - **Option C:** Land east of Bergholt Road
  - **Option D:** Fruit Farm, Capel Road

### Methodology

- 6.2 For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping (see **Table 3.2**) as a methodological framework. **Green** is used to indicate significant positive effects, whilst **red** is used to indicate significant negative effects. Minor effects are also identified, with **light green** indicating minor positive effects and **amber** indicating minor negative effects. Where appropriate neutral effects, or uncertainty will also be noted. Uncertainty is noted with **grey** shading.
- 6.3 Every effort is made to predict effects accurately; however, where there is a need to rely on assumptions in order to reach a conclusion on a ‘significant effect’ this is made explicit in the appraisal text.
- 6.4 Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate **a rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of ‘significant effects’. Numbers are used to highlight the option or options that are preferred from an SEA perspective with 1 performing the best.
- 6.5 Finally, it is important to note that effects are predicted taking into account the criteria presented within Regulations.<sup>7</sup> So, for example, account is taken of the duration, frequency and reversibility of effects.

<sup>7</sup> Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

## Biodiversity

	Option A	Option B	Option C	Option D
<b>Likely effect</b>	<b>Neutral</b>	<b>Neutral</b>	<b>Neutral</b>	<b>Neutral</b>
<b>Rank</b>	<b>3</b>	<b>2</b>	<b>2</b>	<b>1</b>

- 6.6 All sites are located within the 13km “Zone of Influence” of the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site where development will be expected to mitigate the impacts of additional recreational pressures through appropriate contributions. This will be in accordance with the Suffolk Recreational Disturbance Avoidance Mitigation Strategy (RAMS) and the sites are not differentiated in this respect.
- 6.7 All options also fall within the Impact Risk Zone (IRZ) of Freston and Culter’s Woods with Holbrook Park Site of Special Scientific Interest (SSSI); located to the east of the parish. Housing growth within the IRZ has the potential for effects at the designated site, and the identified threshold for further consultation with Natural England applies to residential development of 50 dwellings or more. The low growth proposed at Option B, C and D will not trigger a requirement for further consultation, however; the higher growth proposed at Option A will. The triggering of this threshold naturally indicates a greater potential for negative effects at Option A when compared to the remaining options, though it is considered unlikely that these effects will be of significance (particularly when considered alongside the potential for mitigation).
- 6.8 All four of the options would direct development to sites which are currently wholly or predominately greenfield, agricultural land; with little apparent potential for particularly sensitive habitats.
- 6.9 It is noted that Option B holds wildlife value in light of the Church Road roadside hedge and water filled ditch present; with a number of woodland species previously recorded on the road frontage. The roadside hedge is also recognised as a major dormouse route, functioning as a part of a wildlife corridor. Previous applications have demonstrated that the hedge would have to be broken in two places to provide 2-lane access and egress to the site. It is considered that loss of/ damage to the hedge would lead to negative effects on biodiversity, notably through disturbance to the established habitat corridor for dormice. However, policy requirements are likely to ensure that any loss of habitat is suitably mitigated; for example; through habitat re-creation to ensure dormice can still maintain a corridor through the site. The delivery of mitigation may also present the opportunity to deliver habitat enhancements and biodiversity-net gain, however it is unlikely that this would be significant through the development process.
- 6.10 Options C and D also hold local biodiversity value, notably at Option C this includes the roadside hedge containing coppice stools of hazel and field maple. Option C may require the loss of roadside hedgerow to provide site access, however this is uncertain at this stage. Paddocks to the east of the site are of unknown quality, but unlikely to be species rich. Re-provision and enhancement measures on-site could ensure long-term minor negative effects are avoided and residual minor positive effects are achieved.
- 6.11 Mature trees along the Capel Road frontage and site boundary planting (mature trees/ hedgerows) of Option D are particularly notable, with the potential to support numerous species and function as a wildlife corridor. However, like Option B, any enhancement measures are unlikely to be significant given the scale of development at the site.
- 6.12 The potential to enhance biodiversity with supporting green infrastructure and habitat creation is recognised under all options. However, through a greater potential to avoid loss of existing features, Option D is considered to perform marginally better than Options B and C.
- 6.13 It is noted that Option A may have an increased opportunity to deliver green infrastructure/ net gain given the increased size and capacity of the site compared to all other options.
- 6.14 Overall, Option D performs most positively, given the option could support local biodiversity, with the potential for biodiversity enhancements as part of a landscape-led approach to design

which demonstrates net gains. This could equally be said for Options B and C, however; it is noted that there may be requirements for mitigation to address any loss of existing hedgerow features in development of site access; making the options marginally less preferable when compared to Option D. Option A falls within a SSSI IRZ zone for 50 units or more and is therefore not considered to perform as well when compared to the other options. However, it is considered that this could be suitably mitigated through landscape led design and capitalising upon greater opportunities for net-gain across a larger site area. A requirement for biodiversity net gain on-site in development will be required to ensure the delivery of minor long-term positive effects, but at this stage, and assuming mitigation will avoid negative effects on local habitats, residual neutral effects are considered likely for all options overall.

## Climate change

	Option A	Option B	Option C	Option D
<b>Likely effect</b>	Neutral	Uncertain	Neutral	Neutral
<b>Rank</b>	3	4	2	1

- 6.15 In terms of climate change adaptation, risk from rivers and watercourses (fluvial flooding) is limited to areas in the north, east and south of the parish and none of the options would direct growth to areas which are affected by fluvial flood risk.
- 6.16 However, surface water flood risk within the plan area is more extensive and all options, except Option D, are directly affected. By avoiding areas of known surface water flood risk, Option D is considered to perform better when compared to the remaining options.
- 6.17 A significant proportion of Option A, to the south west of the site is of high risk of surface water flooding. Furthermore, the only lower-lying land surrounds the historically important Holly Wood, which falls within the AONB extension. Sustainable drainage systems will be required on-site to address risks and improve drainage and attenuation rates. Mitigation is considered likely to ensure residual neutral effects at a minimum, improved drainage could ultimately also support minor long-term positive effects.
- 6.18 An area to the north of Option B, as well as an area along the eastern boundary (Church Road) is at medium risk (extending into high risk further north along Church Road). The topography of this site also stands out as an additional factor in the consideration of flood risk. The site is elevated above the road and increases in hard surfacing could exacerbate areas of higher risk along Church Road through increased surface water run-off. Historic local flood events at Church Road have highlighted particular issues in this location; namely the implication for school access, with Bentley Primary School situated just north-east of the site, further along Church Road. Whilst development could bring benefits in terms of measures to improve drainage and attenuation rates, the scale of development proposed at the site is not considered likely to bring about significant change or improvement. In contrast, the greater need for effective mitigation at this location is highlighted, and uncertainty in relation to residual effects is noted at this stage.
- 6.19 There is a small area of land at medium risk of surface water flooding to the southeast of Option C. Incorporation of sustainable drainage on site is considered likely to ensure negative effects are avoided, and residual neutral effects are considered likely overall. Measures to improve drainage and attenuation rates could ultimately support minor long-term positive effects, however, when considering the scale of development at the site, any benefits in this respect are likely to be negligible.
- 6.20 In terms of climate change mitigation, it is considered that there is limited potential to meaningfully differentiate between the sites in relation to reducing contributions to climate change. No site is identified for any significant opportunities to improve upon the baseline. Whilst options could be ranked to some extent in terms of their accessibility to Bentley's limited range of services, this is explored under the 'population and communities' theme. In the context of Bentley's rural location each site is considered to have equal car dependency for accessing services at higher tier settlements; being located on the edge of the existing settlement.



- 6.21 It is considered that there are negligible differences in terms of the ability to achieve ambitious building emissions standards in support of decarbonisation. This is given all sites are relatively small-scale; reflecting the low growth needs identified for the parish. It is however considered that as economies of scale are achieved, opportunities to achieve higher building standards could be capitalised upon. Option A could therefore perform marginally better than the remaining options.
- 6.22 Overall, it is considered that progression of any option alone is not likely to have a significant effect on climate change, which is a global issue. Option D performs most positively given it is sustainably located and is not at risk of flooding. Option A is considered to perform marginally better than Option C; on-site mitigation is likely to ensure residual neutral effects in relation to flood risk at both sites, but the greater scale of development at Option A has minor benefits in terms of the potential to secure drainage improvements and resilience standards. Option B is considered the worst performing of the options given surface water flood risk and topography issues at this location.

## Landscape

	Option A	Option B	Option C	Option D
Likely effect	Significant negative	Minor negative	Minor negative	Minor negative
Rank	4	3	2	1

- 6.23 None of the options are located within the recent extension to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) within the Plan area, however Options, A, C and D are located closer to the AONB, with a greater potential to affect the landscape setting.
- 6.24 Option A is a wholly greenfield site bordering the AONB proposed extension. The loss of greenfield land and the effects of a 60 dwelling scheme encroaching on the AONB here, as well as the potential disruption of views in this location, could potentially have significant long-term negative effects.
- 6.25 Option C is a wholly greenfield site and may require the removal of an established hedgerow in order to gain vehicle access to the site; impacting on important features that contribute to the landscape character of this approach to the village centre. Minor long-term negative effects are considered likely in development at this location.
- 6.26 Option D is a mix of both greenfield and brownfield land which is relatively self-contained with vegetative screening along Station Road. The southwestern boundary of Option D (which coincides with the north western boundary of Option A) is identified as holding a key local view towards the settlement which should be retained and could be enhanced in development. Overall, residual minor negative effects are considered likely as a result of greenfield loss, however, this is offset to some extent through the utilisation of areas of brownfield land, and the potential for development to frame and enhance key views into the settlement.
- 6.27 Option B, although furthest from the proposed AONB extension, given its steep topography (elevated above the road by as much as 1.5 metres), development has the potential to negatively affect key views and the landscape character in the north of the settlement. North of Option B along Church Lane is a key view towards the settlement – noteworthy given the steep topography of the site at this location. There is also a key view to the wider landscape identified along Church Lane coinciding with the eastern site boundary of Option B.
- 6.28 In terms of Option B, further detail is provided by the supplementary landscape work carried out for the site by the NP Steering Group; which demonstrates where uninterrupted views of the site exist (notably from the north, east and west). These views are of great value locally, with many coinciding with local footpaths (i.e. footpath 40 – Potash Lane to Church Road). The view at footpath 40 (looking south towards the settlement boundary) is particularly sensitive as it overlooks the whole site from a raised perspective. Avoidance and mitigation of negative effects in this respect is considered likely to be difficult to achieve. Residual minor negative

effects are considered likely, and the impacts upon local character are considered greater when compared to the likely residual effects of development at Options C and D.

- 6.29 It is also noted that all options fall within the locally designated Special Landscape Area (SLA). All options perform equally in this respect.
- 6.30 In terms of the connection to the existing settlement, Options A - C adjoin the built-up area. However, Option A is disconnected from the settlement by Station Road (Capel Road) and would likely set precedent for further growth into the open landscape, in the setting of the AONB. Option B also has the potential to set precedent for further growth into the open landscape to the north and west of the settlement, adversely impacting upon the rural setting. Option C extends development south of the settlement and would be relatively in keeping with the existing settlement pattern with Bergholt Road providing a notable urban edge. Option D is a similar distance from the amenities of the existing settlement, is mixed green and brownfield and is relatively self-contained with sporadic built form to the north and south. Development may therefore have a reduced impact on the surrounding high quality open rural landscape given screening provided by existing vegetation and neighbouring development.
- 6.31 Overall, Option A proposes a larger development scheme and adjoins the AONB. Development would create an urban extension into the setting of a nationally important landscape and there is the potential for significant negative effects. The effectiveness of mitigation will ultimately be dependent upon aspects such as design, layout and massing; factors which remain uncertain in the absence of detailed applications. Option A is therefore not considered to perform as well as the remaining options in relation to landscape. Given the topography of Option B, and a greater potential for development to affect locally valued views, the potential impacts on landscape character are considered greater in Option B when compared to Options C and D, though residual minor long-term negative effects are anticipated at all three options. Through the utilisation of small areas of brownfield land, Option D is considered to perform marginally better than Option C.

## Historic environment

	Option A	Option B	Option C	Option D
<b>Likely effect</b>	<b>Uncertain</b>	<b>Minor negative</b>	<b>Neutral</b>	<b>Neutral</b>
<b>Rank</b>	<b>2</b>	<b>3</b>	<b>1</b>	<b>1</b>

- 6.32 In terms of designated and non-designated heritage assets within the parish, Dodnash Priory is the only scheduled monument present, and there are 14 Listed Buildings scattered across the Neighbourhood Area. Only two of these Listed Buildings are located in the village centre, and none of the designated heritage assets are in close proximity to site options.
- 6.33 Two of the options are notable for their archaeological potential. Option B is located within an area with a known archaeological site complex (HER no. 006) recorded as cropmarks by aerial photography. Dense multi-period archaeological remains have been recorded in this area and therefore a pre-determination evaluation would be required for this site. The potential for minor long-term negative effects in development is highlighted at this stage.
- 6.34 Option A is identified as adjoining an area of archaeological potential, where appropriate investigation should be sought prior to development. Whilst it is recognised that there is a greater potential for residual neutral effects at this location, an element of uncertainty remains until on-site investigation has been conducted. It is considered that any proposal at both Option A and B should seek to identify potential impacts upon the existence of archaeological remains, so that appropriate mitigation can be agreed prior to development.
- 6.35 In terms of settlement character and setting, there is little to add to that set out above under the 'landscape' SEA theme. Options C and D are considered to perform reasonably. Option C relates reasonably well to the village street scene while Option D is relatively contained, limiting potential for impact on the village's rural setting and identity. Development at Options A and B has the potential to affect the rural setting of the parish, impacting upon the distinctive settlement pattern (Option A) and far reaching views (Option B).

- 6.36 Overall, Option B is not considered to perform as well as the remaining options given its known archaeological values. Options C and D are considered to perform marginally better than Options A and B through avoidance of effects in relation to the historic environment.

## Land, soil and water resources

	Option A	Option B	Option C	Option D
Likely effect	Significant negative	Minor negative	Minor negative	Minor negative
Rank	3	2	2	1

- 6.37 All options are located on greenfield land; the loss of which has the potential for long-term minor negative effects with regards to the efficient use of land. Given the larger size of Option A, it is considered that this is worst performing. Option D includes some brownfield land (redundant agricultural buildings) and therefore is best performing in this respect.
- 6.38 In terms of the location of the best and most versatile agricultural land, a detailed classification has not been undertaken in all parts of the Neighbourhood Plan area. As such, there is a need to rely on the Pre-1988 Agricultural Land Classification to provide an indication of the land classification. The Pre-1988 classification identifies that all options are wholly covered by Grade 2 (Best and Most Versatile) agricultural land. As such it is considered that the development of all options will lead to permanent loss of BMV agricultural land, and permanent negative effects in relation to this SEA theme. The effects under Option A are considered to be of greater significance than all other options given the site is larger in size.
- 6.39 Option A lies within Mineral Safeguarding Zone (MSZ). Appropriate consideration will need to be given to ensure that resources are not unnecessarily sterilised, in accordance with the Suffolk Minerals & Waste Local Plan (2020).
- 6.40 In terms of water resources, Babergh District is served by Anglian Water Services (AWS). It is recognised that the Environment Agency recently published a document entitled 'Areas of Water Stress: final classification' which included a map of England, identifying areas of relative water stress. The whole of AWS' supply area is shown as an area of 'Serious' water stress, based upon the amount of water available per person both now and in the future. The NPPF (2019) states that Local Plans should plan positively to ensure the provision of infrastructure for water supply, including an assessment of its quality and capacity. In the context of the current assessment, it is anticipated that the Water Resources Management Plan (WRMP) prepared by AWS will be expected to address long-term water resource issues associated with growth in the Neighbourhood Plan area. Furthermore, the low level of residual housing need required within the Plan area is unlikely to lead to significant effects. It is noted that Option A has the capacity to significantly exceed the residual need and therefore is worst performing in this respect.
- 6.41 Overall, it is considered that development under any of these options will result in the loss of greenfield and high-quality agricultural land; leading to permanent negative effects in relation to soil resources. These effects are likely to be of significance under Option A given the greater extent of loss of high-quality soil resources at this site. The effects of development on mineral resources would also need to be considered under this option. Option D is considered to perform marginally better than Options B and C through its utilisation of areas of previously developed land.

## Population and communities

	Option A	Option B	Option C	Option D
<b>Likely effect</b>	<b>Significant positive</b>	<b>Minor positive</b>	<b>Minor positive</b>	<b>Minor positive</b>
<b>Rank</b>	<b>1</b>	<b>3</b>	<b>2</b>	<b>2</b>

- 6.42 Options B-D are considered to perform on a par in relation to the populations and communities SEA objectives, as it is assumed all three options would deliver the residual housing need in full (9 dwellings) and lead to minor long-term positive effects. Option A however is anticipated to lead to positive effects of greater significance given the increased dwelling capacity at this site (60 dwellings).
- 6.43 All options perform positively by directing growth to sites with the indicative capacity to deliver over 10 dwellings and secure affordable homes in line with emerging Local Plan policy thresholds<sup>8</sup>. However as above, Option A is best performing in this respect given the increased level of growth and subsequent potential increased affordable home delivery.
- 6.44 Options A, C and D are considered to perform on a par in terms of the potential to support sustainable access to local services and facilities. This is because growth under any of the options would offer broadly similar potential to walk to the limited range of services in the village, whilst also necessitating car dependency for access to higher tier services outside the village. Option B is further from the majority of services and facilities in the village, with the exception of the village school located to the west of the settlement.
- 6.45 Given economies of scale, it is considered that Option A may lead to greater positive effects by delivering more infrastructure alongside housing development at the site. This could include built infrastructure, green infrastructure and/ or opportunities for net gains in biodiversity; supporting high quality, connected communities.
- 6.46 Overall, positive effects are considered likely under all options, but these effects are considered likely to be of greater significance under Option A given the greater scale of development at the site. Option B is considered the worst performing of the options, given its location slightly further away from most of the services and facilities in the village.

## Health and wellbeing

	Option A	Option B	Option C	Option D
<b>Likely effect</b>	<b>Neutral</b>	<b>Neutral</b>	<b>Neutral</b>	<b>Neutral</b>
<b>Rank</b>	<b>3</b>	<b>2</b>	<b>3</b>	<b>1</b>

- 6.47 Existing healthcare services are located outside the settlement area and as such, all options are considered to perform broadly on par; i.e. residents at any of the sites will need to travel to access healthcare facilities.
- 6.48 The parish has a good Public Rights of Way (PRoW) network, which extends along the eastern site boundary of Option D and to the north of Option B. Notably, the PRoW along the boundary of Option D connects to a popular 7km Circular walk around the parish. Option D, followed by Option B are therefore considered to perform marginally better than Options A and C through their ability to connect with existing footpaths and promote active travel in this respect, as well as their enhanced recreational connections with the surrounding countryside.
- 6.49 All options are considered likely to benefit from reasonably good access to the green and open spaces which support recreational opportunities within the Parish and the options are not differentiated in this respect.

<sup>8</sup> Babergh and Mid Suffolk Reg 19 Local Plan Policy SP02 – Affordable Housing states that *a contribution of 35% affordable housing<sup>18</sup> will be required on sites of ten or more dwellings or 0.5ha or more.*

- 6.50 Overall, through greater opportunities to support healthy and active lifestyles with good connections to existing infrastructure, Option D, followed by Option B are considered to perform marginally better than Options A and C (which are considered to perform on par with each other). Despite this, all options are considered likely to lead to broadly neutral effects, with no significant deviation from the baseline.

## Transportation

	Option A	Option B	Option C	Option D
<b>Likely effect</b>	<b>Minor negative</b>	<b>Minor negative</b>	<b>Minor negative</b>	<b>Minor negative</b>
<b>Rank</b>	<b>2</b>	<b>3</b>	<b>2</b>	<b>1</b>

- 6.51 All options are considered likely to require infrastructure improvements to accommodate highways access and ensure safe pedestrian access. Proposals under any option will be required to consult further with the Highways Authority.
- 6.52 Options A, C and D are considered to perform on a par in terms of the potential to support sustainable access to services and facilities. This is because growth under any of the options would offer broadly similar potential to walk to the limited range of services in the village, whilst also necessitating car dependency for access to higher tier services outside the village. Option B relates least well to the majority of services and facilities in the village, with the exception of the village school located to the west of the settlement. It is noted that the village is working with Suffolk County Council to designate the lane along the eastern boundary of Option B as a 'quiet lane'. Once designated, further vehicular traffic along the lane is likely to be even less desirable for both drivers and the walkers, riders, and cyclists sharing the lane.
- 6.53 Sustainable travel options are limited in the village, with all options performing equally in terms of access to rail services (located at Manningtree and Ipswich). There are two bus stops located centrally within the village, although only one service runs daily to Ipswich. It is therefore difficult to distinguish between options in this respect. The parish does however have a good Public Rights of Way (PRoW) network, which extends along the eastern site boundary of Option D and to the north of Option B.
- 6.54 Overall it is considered that all options will be required to establish safe vehicular and pedestrian access as part of development proposals, and that all options with the exception of Option B have good connection with village amenities. Options A, C and D are therefore considered to perform marginally better than Option B. Option B also performs least positively in light of the 'quiet lane' being designated adjacent to the site; which will require low levels of motorised traffic use. Option D is also considered to perform marginally better than Option A and C given its direct connection with the existing PRoW network. Options A and C perform on a par with each other in relation to the transport SEA objective. However, any new development is considered likely to increase car usage in the Plan area to some degree, as residents continue to travel to higher-order settlements to access a wider range of goods and services.

## Summary findings

SEA theme		Option A	Option B	Option C	Option D
Biodiversity	Likely effect	Neutral	Neutral	Neutral	Neutral
	Rank	3	1	2	1
Climate change	Likely effect	Neutral	Uncertain	Neutral	Neutral
	Rank	3	4	2	1
Landscape	Likely effect	Significant negative	Minor negative	Minor negative	Minor negative
	Rank	4	3	2	1
Historic environment	Likely effect	Uncertain	Minor negative	Neutral	Neutral
	Rank	2	3	1	1
Land, soil and water resources	Likely effect	Significant negative	Minor negative	Minor negative	Minor negative
	Rank	3	2	2	1
Population and communities	Likely effect	Significant positive	Minor positive	Minor positive	Minor positive
	Rank	1	3	2	2
Health and wellbeing	Likely effect	Neutral	Neutral	Neutral	Neutral
	Rank	3	2	3	1
Transportation	Likely effect	Minor negative	Minor negative	Minor negative	Minor negative
	Rank	3	2	3	1

- 6.55 Overall, Option A is the only option considered for its potential to lead to significant negative effects in relation to the SEA themes of landscape and land, soil and water resources. The effects relate to the potential loss of around 4ha of high-quality agricultural land and the encroachment of the urban area within the setting of the AONB. However, considering economies of scale, Option A is also has the potential for significant positive effects in relation to the SEA theme of population and communities through the potential to deliver more affordable homes and supporting infrastructure.
- 6.56 In terms of the ranking of options, Option D performs notably well across most SEA themes, particularly as a result of the utilisation of small areas of brownfield land (redundant agricultural buildings) and the avoidance of flood risk and effects in relation to the historic environment. Option D also connects well to the existing PRoW network, with opportunities to support new residents with good access to recreational and active travel routes.
- 6.57 Aside from Option A, Options B-D broadly perform on par in terms of likely effects, and minor negative effects are anticipated under all options in relation to the landscape, land, soil and water resources, and transportation themes. This predominantly reflects a loss of greenfield land and the subsequent effects on landscape character. However, a lack of brownfield alternatives is noted. Furthermore, Option B is noted for additional potential minor negative effects which relate to known archaeological resources at the site.

## 7. Developing the preferred approach

- 7.1 The Parish Council's reasons for developing the preferred approach (Option D) in light of the alternatives assessment are identified below:

*"The Parish Council supports Option D, namely allocation of the site at the Fruit Farm, Capel Road for around 15 dwellings. There may also be scope at the rear of this land for affordable housing on a Rural Exception Site; the Parish Council is exploring this option outside of the Neighbourhood Plan.*

*It does not support any other potential site; in particular, the loss of visual amenity if Option B were to be developed would be a severe blow to the character of the village.*

*The Parish Council recognises that some negative impact on the landscape could result from the loss of boundary planting on Capel Road (Option D) and that an allocation should seek to minimise any loss and compensate for this loss through replacement planting at the rear of the visibility splays to the vehicular access."*

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



## 8. Introduction (to Part 2)

8.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current 'Submission' version of the Bentley NP. This chapter presents:

- An appraisal of the current version of the Bentley NP under the eight SEA theme headings; and
- The overall conclusions at this current stage and recommendations for the next stage of plan-making.

### Bentley Neighbourhood Plan policies

8.2 The Bentley NP puts forward 25 policies to guide development in the Plan area and this includes two site allocation policies 'Land at Oakleigh' and 'Land at the Fruit Farm'. **Table 5.1** groups the drafted policies under the six broad policy themes set out within the Neighbourhood Plan.

**Figure 8.1 Bentley Neighbourhood Plan policies**

#### Policy reference and title by theme

##### Spatial strategy

<b>BEN1</b>	Spatial strategy
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##### Housing

<b>BEN2</b>	Housing Development
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<b>BEN3</b>	Land at Oakleigh, Capel Road
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<b>BEN4</b>	Land at the Fruit Farm, Capel Road
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<b>BEN5</b>	Affordable Housing on Rural Exception Sites
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<b>BEN6</b>	Housing Mix
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<b>BEN7</b>	Measures for New Housing Development
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##### The Built Environment

<b>BEN8</b>	Developing Design
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<b>BEN9</b>	Flooding and Sustainable Drainage
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<b>BEN10</b>	Renewable Energy in Developments
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<b>BEN11</b>	Parking Standards
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<b>BEN12</b>	Development Affecting the Area of Outstanding Natural Beauty
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<b>BEN13</b>	Protecting Bentley's Landscape Character
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<b>BEN14</b>	Protecting Habitats and Wildlife Corridors
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<b>BEN15</b>	Recreational Disturbance Avoidance and Mitigation
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<b>BEN16</b>	Dark Skies and Street Lighting
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##### Historic Environment

<b>BEN17</b>	Heritage Assets
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<b>BEN18</b>	Buildings of Local Significance
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##### Development of Infrastructure and Services

<b>BEN19</b>	Sustainable Transport and Infrastructure Services
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<b>Community Facilities</b>	
<b>BEN20</b>	Protecting Existing Services and Facilities
<b>BEN21</b>	Sport and Recreation Facilities
<b>BEN22</b>	Local Green Spaces
<b>BEN23</b>	Community Technology
<b>BEN24</b>	Broadband
<b>BEN25</b>	Infrastructure Delivery

## Methodology

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

# 9. Assessment of the plan

## Introduction

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

## Biodiversity

- 9.2 There are no internationally designated nature conservation sites within Bentley Parish, however the Neighbourhood Plan area is located within the 13km “Zone of Influence” (Zol) of the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site, located to the east of the settlement. It was therefore concluded at the Habitats Regulations Assessment (HRA) ‘Screening’ stage that without mitigation, further consideration was required at the Appropriate Assessment (AA) stage to determine whether the Bentley Neighbourhood Plan, alone or in-combination with other plans and projects, would adversely affect the integrity of internationally designated sites as a result of the ‘recreational disturbance’ impact pathway.
- 9.3 In applying the HRA Test 2 –the integrity test at AA stage - based on the development type and proximity to Habitats (European) sites, it is concluded that mitigation needs to be embedded in the Plan in relation to residential developments of more than 50 dwellings to avoid impacts from recreational disturbance from the Plan alone.
- 9.4 The predicted in combination effects resulting from other plans or projects was also assessed through the AA and avoidance and/or mitigation measures considered/ recommended. The AA subsequently concludes that embedded mitigation measures for projects will need to be considered in project level HRA/AA reports and secured by way of a legal agreement attached to any planning consent. Therefore, there will be no need for further assessment for this Neighbourhood Plan, and the Neighbourhood Plan, with mitigation secured, is not considered likely to result in any adverse effect on the Integrity of the internationally designated sites in scope, either alone or in combination with other plans and projects. The SEA supports the conclusions and recommendations of the HRA.
- 9.5 As discussed through the HRA, the Suffolk Coast Recreational Disturbance Avoidance Mitigation Strategy (RAMS) is a key consideration for development proposals within the Zol, and this is reflected through the Neighbourhood Plan policy framework. In line with Policy BEN15 (Recreational Disturbance Avoidance and Mitigation) *“all residential development within the zones of influence of European sites will be required to make a financial contribution towards mitigation measures [...] to avoid adverse in-combination recreational disturbance effects on European sites.”*
- 9.6 In terms of the site allocations, Land at the Fruit Farm site is located within the 13km Zol of the Stour and Orwell Special Protection Area (SPA) and Special Area of Conservation (SAC). The Neighbourhood Plan recognises that it will be necessary for developers to make a contribution towards mitigating the potential impact of the development on the protected areas, in accordance with Policy BEN15. In addition, specific on-site measures are required to help mitigate potential impacts on the wider area. Policy BEN4 (Land at the Fruit Farm, Capel Road) requires that *“A contribution to the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy will be necessary and residents of the new properties should be provided with leaflets about the local public rights of way network. Additional dog-waste bins shall also be provided.”* It is however recognised that further mitigation may need to be embedded into the planning policy framework in line with the AA conclusions set out above.
- 9.7 There are no nationally designated nature conservation sites within Bentley Parish, however Freston and Culter’s Woods With Holbrook Park Site of Special Scientific Interest (SSSI) is located approximately 800m east of the parish. The parish falls within Impact Risk Zones (IRZs) for the SSSI where residential development of 50 dwellings or more will require further

consultation with Natural England. However, the low level of additional growth proposed through the Neighbourhood Plan does not reach this threshold.

- 9.8 In line with development principles set out in the Parish Design Guidelines (AECOM, 2019), proposals for site allocations will be required maintain all existing mature trees along the Capel Road frontage and the site boundary planting. This requirement (and further biodiversity gains) are shown in detail through the illustrative masterplan proposed for Land at the Fruit Farm; and will support ecological connectivity throughout the new development and wider surrounds.
- 9.9 Protecting and enhancing the Parish's valued biodiversity resource and green infrastructure network is a key objective for the Neighbourhood Plan. Bentley's ancient woodlands are of local significance, encompassed in the South Suffolk Ancient Woodlands Cluster (Suffolk Nature Strategy 2014) and designated County Wildlife Sites (CWSs). Bentley also contains many species rich hedgerows and veteran trees. Springs, ponds, streams, two large reservoirs are also present that support ecological connectivity within and outside of the parish. The Neighbourhood Plan sets out a number of provisions to help limit potential effects of new development on these features and areas of biodiversity interest in and surrounding the Plan area, and support enhancements. Policies BEN22 (Local Green Spaces) and BEN14 (Protecting Habitats and Wildlife Corridors) are notable in this respect. Policy BEN14 states that *"development proposals should avoid the loss of, or substantial harm to, important trees, hedgerows and other natural features such as ponds."* Furthermore, *"Proposals that are likely to have an adverse impact on protected habitats will not normally be permitted"*.
- 9.10 Policy BEN8 (Development Design) encourages the enhancement of linkages between local habitats; supporting proposals where they *"incorporate measures to protect and enhance biodiversity, with regard to the emerging Environment Bill, and to consider the NPPF requirement for measurable net gain in biodiversity, preserving trees, hedgerows, and other wildlife corridors, and including measures such as the installation of swift bricks on every new house."* The support for net-gain is reiterated through Policy BEN14 and is anticipated to lead to positive effects in the long term, delivering measurable resilience to current and future pressures.
- 9.11 There is currently no street lighting in the village, and it is recognised that artificial light can have an adverse impact on nature conservation (i.e. through disturbance). Policy BEN16 (Dark Skies and Street Lighting) therefore requires that that *"Any future outdoor lighting systems should have a minimum impact on the environment by minimis[ing] light pollution and adverse effects on wildlife."*
- 9.12 Overall, assuming the recommendations set through the HRA are adopted, it is considered that the premise for biodiversity protection, enhancement, and net gain embedded through the Neighbourhood Plan policy framework is predicted to have **minor long-term positive effects** for biodiversity.

## Climate change

- 9.13 The climate change SEA objectives have a dual focus of reducing the contribution of the Neighbourhood Plan area to climate change and supporting resilience to the potential effects of climate change, particularly flooding. In practice, development plans can contribute to mitigating the effects of climate change by minimising greenhouse gas emissions from the built environment. Adapting to the effects of climate change includes ensuring development is directed away from areas at greatest risk of flooding and limiting effects of extreme weather.
- 9.14 In terms of adapting to climate change, the Bentley Neighbourhood Plan performs well overall; focussing growth away from areas of fluvial flood risk. Flood risk from rivers and watercourses (fluvial flooding) is limited to areas in the north, east and south of the parish and affects few if any residential properties. Neither of the site allocations are at risk of surface water flooding, although several areas in Bentley are prone to this, particularly along Church Road, Station Road, Capel Road, Hazel Shrub, and Bergholt Road. Policy BEN9 (Flooding and Sustainable Drainage) therefore requires that all new proposals *"appropriately manage on site drainage"*. Specifically, the installation of grey water recycling and rainwater and stormwater harvesting within schemes is supported through Policy BEN9 (Flooding and Sustainable Drainage) in

order to reduce the potential for development to worsen surface water flooding. This is reiterated through Policy BEN8 (Development Design) which sets out support for proposals where they “*prevent water runoff that would add-to or create surface water flooding*” and “*incorporate grey water recycling and rainwater and stormwater harvesting.*”

- 9.15 Well planned green infrastructure can help an area adapt to and manage the risks of climate change (including flood risk). Enabling and providing for green infrastructure within the Parish is therefore a key opportunity in which the Plan can help to promote climate change adaptation measures. Policy BEN14 (Protecting Habitats and Wildlife Corridors) and Policy BEN22 (Local Green Spaces) perform positively in this respect. Notably, Policy BEN14 supports proposals “*where they provide a net gain in biodiversity through, for example:*
- *the creation of new natural habitats including ponds;*
  - *the planting of additional native trees and hedgerows; and*
  - *restoring and repairing fragmented biodiversity networks.*”
- 9.16 In 2019, Babergh District Council voted to support Suffolk’s county-wide aim of becoming carbon neutral by 2030. The Neighbourhood Plan recognises that minimising energy demands from development and increasing the generation of energy from renewable sources can make a significant contribution to reducing carbon emissions. Therefore, for both site allocations the Neighbourhood Plan expects development to secure energy efficiency and sustainability objectives of the Local Planning Authority and NPPF (2019). This is in line with principals set out within the AECOM Design Guide (2019), and includes renewable energy schemes; grey water, surface water and storm water harvesting and recycling provision.
- 9.17 The design principles set out above have informed Policy BEN10 (Renewable Energy in Developments) which sets out energy efficiency criteria for development to adhere to unless it can be demonstrated to be unviable. This includes:
- *“Incorporating best practice in energy conservation, be designed to achieve maximum achievable energy efficiency through the use of high quality, thermally efficient building materials and which are energy efficient in their manufacturing, transport, and building processes; [and]*
  - *Maximising the benefits of solar gain in site layouts and orientation of buildings.*”
- 9.18 Policy BEN10 also requires that proposals to accord with the energy hierarchy; prioritising sustainable energy sources to help meet local and national emissions targets.
- 9.19 Support for energy efficiency is provided further through Policy BEN16 (Dark Skies and Street Lighting). Policy BEN16 states that “*schemes should reduce the consumption of energy by promoting efficient outdoor lighting technologies, keeping the night-time skies dark and reducing glare.*”
- 9.20 Provisions set out in Policy BEN19 (Sustainable Transport Infrastructure and Services) and Policy BEN11 (Parking Standards) are likely to be effective at reducing emissions from transport; targeting local improvements that can support a modal shift and active travel opportunities. In this respect, there is little to add to the discussion presented below, under the ‘Transportation’ SEA theme. Notably in terms of support for lower-emission vehicles (i.e. Electric Vehicles), Policy BEN11 (Parking Standards) requires that “*Cabling for electric vehicle charging provision should be fitted to each dwelling, in line with Suffolk parking standards.*” Furthermore, “*all new non-residential development should include electric vehicle EV charging provision in accordance with the minimum standards in the current Suffolk Parking Guidelines.*”
- 9.21 It is also worth noting that Policy BEN23 (Communications Technology) and Policy BEN24 (Broadband) may lead to indirect positive effects through increasing opportunities for working from home. This is anticipated to reduce the need for residents to travel, particularly at ‘rush hour’, and is considered likely to become a longer-term trend in light of the ongoing COVID-19 pandemic.
- 9.22 Overall, it is considered that the Neighbourhood Plan is likely to lead to **minor positive effects** in relation to the climate change SEA theme. The Neighbourhood Plan seeks to deliver

sustainably located growth; supports the uptake of active travel, reduced travel, and EV's; and seeks to ensure development proposals contribute to Babergh's carbon neutral target through sustainable design and construction.

## Landscape

- 9.23 Bentley is a rural settlement in the setting of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB). The Suffolk Landscape Character Assessment characterises the rural landscape as “*ancient estate farmlands*”. The Neighbourhood Plan recognises the value of the landscape in and around Bentley Parish, stating that it is “*essential that new development should have regard to the character of the surrounding landscape and, in particular, to the setting of the nationally significant landscape of the Suffolk Coast and Heaths AONB.*”
- 9.24 The 2020 extension to the AONB puts most of the parish in the AONB setting. The Suffolk Coast and Heaths AONB Partnership Position Statement (December 2015) states that “*the setting, including the views into and out of the AONB, is considered to be the area within which development and land management proposals, by virtue of their nature, size, scale, siting, materials, or design can be considered to have an impact, positive or negative, on the natural beauty and special qualities of the nationally designated landscape*”. This is reflected through the Neighbourhood Plan; with Policy BEN12 (Development Affecting the Area of Outstanding Natural Beauty) stating that “*development will not be permitted where it would have a significant adverse impact on the natural beauty and special qualities of the AONB and its setting, and which cannot be adequately mitigated.*” Furthermore, “*Development proposals within the Area of Outstanding Natural Beauty, or within its setting, should be informed by landscape and visual impact assessment to assess and identify potential impacts and to identify suitable measures to avoid or mitigate these impacts.*”
- 9.25 Policy BEN1 (Spatial Strategy) focusses growth within the designated settlement boundary, thereby ensuring that the undeveloped rural countryside and AONB setting is preserved and remains largely undeveloped.
- 9.26 The Babergh Core Strategy identifies the majority of the parish (with the exception of small areas to the west) as a Special Landscape Area (SLA), although the emerging Joint Local Plan does not propose to carry the SLA local landscape designations forward. However, the Landscape Appraisal carried out for the parish (2019) states that “*the northern part of the Parish has a weight of evidence to support its recognition as a valued landscape due to its intact historic patterns of settlement, ancient woodland, remnant parkland and rural lanes.*” This attractive landscape adds to the amenity value of the village, connecting Bentley with the open countryside. Policy BEN13 (Protecting Bentley's Landscape Character) therefore requires that all development proposals refer to the Landscape Character Appraisal to ensure any potential effects on the local landscape (see criteria set out in Policy BEN13) are suitably mitigated. Furthermore, proposals are required to “*demonstrate how the landscape characteristics of the site and its vicinity have been considered in preparing the scheme.*”
- 9.27 In support of the preparation of the Neighbourhood Plan a Design Guide has been prepared by AECOM (2019) to inform new development proposed in the area. It presents a summary of the key characteristics of the Neighbourhood Plan area, reflecting the sensitivity of the local landscape (as discussed above). Together with the Neighbourhood Plan Landscape Appraisal (2019), these documents have been used to inform specific design guidelines; ensuring the positive aspects of the character of the village are maintained and where possible enhanced. In line with Policy BEN8 (Development Design) planning applications must “*satisfy the requirements of the Development Design Checklist*” (prepared by AECOM), and “*demonstrate how they meet the general design principles [...] and take account of the Bentley Design Guide.*” Furthermore, “*proposals will be supported where they:*
- *maintain and preserve the existing quiet and tranquil atmosphere of Bentley and enhance the character of the village and its setting; [and]*
  - *reflect the qualities and character of the setting of the village within a high quality rural landscape, as identified in the Bentley Landscape Character Appraisal.*”

- 9.28 In terms of the site allocations, Land at the Fruit Farm is a greenfield site located on the edge of the settlement to the north west, in the SLA and the setting of the AONB extension. However, the site is relatively self-contained, and proposals will be required to retain *“mature trees along the Capel Road frontage and the site boundary planting”*. Furthermore, it is expected that the development will be carried out in accordance with the Concept Plan prepared by AECOM, which details open green space and screening plantation along Capel Road. Design criteria set out, in addition to the wider Neighbourhood Plan policy framework, is anticipated to mitigate the impact of proposed development on the existing landscape.
- 9.29 The Neighbourhood Plan sets out development principles for Land at Oakleigh; similarly requiring that all existing mature trees along the Capel Road frontage and the site boundary planting shall be retained. For both site allocations it is recommended that a requirement for the retention of trees where possible (and replanting where retention is not possible) be moved into the policy rather than supporting text (Policy BEN3 and BEN4). This will increase the weight of the requirement and strengthen the policy framework overall.
- 9.30 Outside of the specific site allocations, Policy BEN5 (Affordable Housing on Rural Exception Sites) states that *“Where sites for affordable housing in the countryside are brought forward with an element of market housing, both housing tenures should be built to the same design standards and contribute towards the character of the area.”* This will likely lead to positive effects in the long term, ensuring important, sensitive aspects of the village are enhanced, conserved and/ or avoided through new rural development.
- 9.31 Overall, it is considered that the Neighbourhood Plan policy framework provides a level of protection for valued features, views and open countryside within and surrounding the Parish. This includes the amended AONB and it is recognised that proposed Neighbourhood Plan policy requirements will be underpinned by the AONB Management Plan, and policy requirements of the emerging Joint Local Plan. Neighbourhood Plan site allocations have been developed using the Bentley Landscape Character Appraisal, parish Design Guidelines and masterplanning which are considered to suitably mitigate the potential for residual negative effects. **Neutral effects** are anticipated, and there is opportunity to strengthen the policy framework in line with the recommendation above.

## Historic environment

- 9.32 The parish has a rich history and a number of historic assets present. Policy BEN17 (Heritage Assets) and BEN18 (Buildings of Local Significance) therefore seek to ensure that development proposals affecting local heritage assets and buildings of local significance are given appropriate consideration. In line with Policy BEN17, proposals must *“preserve or enhance the significance of the heritage assets of the Village, their setting, and the wider built environment”* amongst other criteria set out. Other criteria include contributing *“to the Village’s local distinctiveness, built form, and scale of its heritage assets, as described in the AECOM Design Guidelines.”* As discussed above, the Design Guidelines (2019) seek to ensure that positive aspects of the village are protected and enhanced; setting design principles and a design ‘checklist’ for proposals to respond to. Specifically, design principles include:
- “Reflect, respect and reinforce local architecture and historic distinctiveness;
  - Respect surrounding buildings in terms of scale, height, form and massing; and
  - Adopt contextually appropriate materials and details.”
- 9.33 These principals are reinforced through Policy BEN8 (Development Design), which further requires proposals consider the design checklist; supporting proposals where they:
- *“produce designs that respect and address the character, scale, height and density of the locality; [and]*
  - *as appropriate, include external front and rear gardens designed to take account of the context of the development, including the character of the surrounding area.”*

- 9.34 Furthermore, in order to manage the potential impacts of growth, Policy BEN1 (Spatial Strategy) requires that new development will be focused within the designated Settlement Boundaries, thereby ensuring that the rural countryside and settlement pattern is preserved.
- 9.35 These policies are anticipated to lead to long term positive effects overall, meeting Neighbourhood Plan objectives to “*maintain and enhance a strong rural identity and sense of place for the parish*” and “*to ensure new development is designed to reflect local character*”.
- 9.36 In terms of the site allocations, neither are constrained by designated heritage assets. However, it is noted that large and small areas of woodland and planting within the parish contribute greatly to local historical values. For both site allocations the Neighbourhood Plan policies (BEN3 and BEN4) require that “*all existing mature trees along the Capel Road frontage and the site boundary planting shall be retained*”. This is of importance because the Capel Road frontage is formed by an ancient boundary ditch.
- 9.37 Overall it is considered that the Neighbourhood Plan and its supporting evidence, alongside the higher-level policy suite, provides a robust framework for the protection and enhancement of the historic environment. **Neutral effects** are anticipated.

## Land, soil and water resources

- 9.38 While minor aspects of the Fruit Farm site allocation are brownfield land (redundant agricultural buildings), development at the proposed site allocations will result in the loss of greenfield land and minor long-term negative effects are considered likely in relation to land and soil resources as a result. However, it is recognised that this reflects a lack of alternative wholly brownfield options available in the village rather than inefficient land use.
- 9.39 The precise soil quality is unknown at this stage. Indicative data suggests that the majority of the Bentley settlement (including both site allocations) is underlain by Grade 2 agricultural land; which is acknowledged as BMV land within the NPPF (2019). As such it is considered likely that development at both sites would lead to loss of areas of this valuable resource, leading to long term negative effects in terms of the land, soil and water SEA theme. However, a level of uncertainty remains, and it is recognised that any alternative growth site is also likely to result in similar effects (with no available options in areas of lower quality agricultural land).
- 9.40 Supporting biodiversity and facilitating enhancements to green infrastructure provision in the Neighbourhood Plan area will likely improve the quality of land and water resources. This will promote the ability of natural processes to support soil and water quality. Key policies in this regard includes Policy BEN14 (Protecting Habitats and Wildlife Corridors), Policy BEN21 (Sport and Recreation Facilities) and Policy BEN22 (Local Green Space).
- 9.41 It is considered that any issues surrounding water resources, including wastewater treatment, will be a matter for Anglian Water. The Water Resources Management Plan (WRMP) (2019) sets out how water supply and demand will be balanced over the next 25 years; ensuring adequate supply to homes whilst also protecting the environment.<sup>9</sup> The Neighbourhood Plan policy framework supports specific design opportunities in this respect; notably Policy BEN8 (Development Design) and BEN9 (Flooding and Sustainable Drainage) support proposals where they “*incorporate grey water recycling and rainwater and stormwater harvesting*”.
- 9.42 Overall, **minor long-term negative effects** are considered an inevitable consequence of growth and the loss of greenfield land in the village. The effects in relation to agricultural land resources are **uncertain** until site-level assessments can determine precise soil quality at the sites. Negative effects in this respect relate specifically to Land at the Fruit Farm given development at Land at Oakleigh would take place with or without the Neighbourhood Plan.

## Population and communities

- 9.43 The Neighbourhood Plan provides for around 58 additional dwellings to be developed in the Parish throughout the plan period. In addition to the implementation of planning permissions,

<sup>9</sup> Anglian Water (2019) Water Resource Management Plan 2019 [online] available at: <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf>



- growth will be met through site allocations identified in Policies BEN 3 and BEN 4. The delivery of housing to meet local needs is anticipated to lead to significant positive effects in the long term.
- 9.44 Policy BEN1 (Spatial Strategy) defines a settlement boundary within which housing development will be predominantly located; supporting social cohesion and accessible development in terms of local connections. Support is provided through the policy for appropriate uses in the surrounding countryside which *“are essential for the operation of existing businesses, agriculture, horticulture, forestry, outdoor recreation and other exceptional uses”*, where certain criteria is met (see Policy BEN1). Minor long-term positive effects for communities are anticipated overall.
- 9.45 Affordability of housing remains a significant barrier for many seeking their own homes in Bentley. The Neighbourhood Plan Housing Needs Assessment (AECOM, 2020) identified that a total of 18 affordable homes would be required over the plan period. It is anticipated that the developments on the Oakleigh and Fruit Farm sites would provide approximately 10 affordable homes in line with NPPF (2019) defined 35%. The Neighbourhood Plan therefore also supports proposals for affordable housing on rural exception sites (Policy BEN5) *“where there is a proven local need”* and provided the housing meet criteria set out in Policy BEN5.
- 9.46 In terms of the housing mix, it is noted that Bentley has an ageing demographic, with over 40% of residents aged over 60. There is therefore a growing need for bungalows and accessible smaller houses, as residents wish to downsize, and potentially need to access more support services as they age. This is supported by conclusions of the Village Questionnaire, which indicated a clear need for downsized accommodation for older residents. To address this need, Policy BEN4 (Land at the Fruit Farm, Capel Road) states that *“Housing proposals should provide a mix of sizes in accordance with Policy BEN 6 as well as a mix of houses and bungalows.”*
- 9.47 High-quality design is promoted throughout the Neighbourhood Plan; notably through Policy BEN8 (Development Design), which requires applications to *“demonstrate how they satisfy the requirements of the Development Design Checklist in Appendix B of this Plan and take account of the Bentley Design Guide”*. General design principles include *“Harmonise with and enhance the existing settlement in terms of physical form, movement pattern and land use”* and *“Reinforce or enhance the established character of streets and other space”*. As a result, long-term positive effects are anticipated for population and community in respect of providing new high-quality and appropriate homes.
- 9.48 The Neighbourhood Plan also recognises the importance of homes meeting the latest nationally described space standards (Policy BEN7). This will deliver positive effects through encouraging enough space in homes to ensure that they can be used flexibly by a range of residents.
- 9.49 The village contains many locally valued service and facility provisions, the retention of which is protected through Policy BEN20 (Protecting Existing Services and Facilities) and Policy BEN21 (Sport and Recreation Facilities). In addition to providing protection to village assets, the policies outline support *“for the provision, enhancement and/or expansion of facilities.”* Policy BEN22 (Local Green Spaces) subsequently outlines the designation of seven new green spaces, identified through a village Local Green Space Appraisal. The delivery of new green spaces will contribute positively towards enhancing the local green infrastructure network, including promoting active travel routes. Improved accessibility will also be supported through Policy BEN19 (Sustainable Transport and Infrastructure Services) which seeks to improve walking and cycling links to key local services and subsequently improve traffic flow.
- 9.50 Policy BEN25 further sets out support for infrastructure improvements in the village, stating that *“Planning permission will only be granted where the infrastructure necessary to make the scheme acceptable in planning terms is available or capable of being made available before the development is occupied.”*
- 9.51 Both site allocations are in close proximity to the centre of the village and short walking distance from local amenities and services, supporting sustainable growth in the parish. The parish Design Guide (AECOM, 2020) will further ensure that development proposals are

appropriately planned and capitalise upon enhanced access to the village centre. Notably, the development design checklist (referenced throughout the policy framework) includes asking if proposals *“Integrate with existing paths, streets, circulation networks and patterns of activity”*.

- 9.52 The Neighbourhood Plan recognises the importance of ensuring that future broadband provision in the village keeps pace with improvements to technology. It is considered that Policy BEN23 (Communications Technology) and Policy BEN24 (Broadband) will lead to positive effects for the population and community through improving opportunities for residents to work from home. This is likely to be significant for the village given the current COVID-19 pandemic and the global shift to home-working.
- 9.53 Overall it is considered that the Neighbourhood Plan will lead to **significant long-term positive effects** in relation to the population and communities SEA theme. This is through the delivery of a range of new homes to meet the needs of all sectors of the community; alongside the protection and enhancement of the high-quality public realm, community infrastructure, and accessibility of services.

## Health and wellbeing

- 9.54 Green spaces within the village, and access to the wider countryside are important to promote a healthy lifestyle and retain the rural setting of Bentley Parish. The Neighbourhood Plan seeks to protect existing green spaces; notably through designating seven important green sites in the village as Local Green Space (Policy BEN22). Proposed designations reflect the findings of the Local Green Space Appraisal undertaken for the Neighbourhood Plan (which demonstrates how certain local spaces meet the criteria in paragraph 100 of the NPPF (2019)) and will restrict development to that which is essential for each site. This will maintain the important contributions made by the sites to the character and setting of the local built environment.
- 9.55 Protection is further provided to existing amenity, sport or recreation open space or facilities in the parish through Policy BEN21 (Sport and Recreation Facilities). Policy BEN21 precludes loss unless *“it can be demonstrated that the space or facility is surplus to requirement”* or *“replacement for the space or facilities lost is made available”*. Maintaining important green infrastructure in the Parish is anticipated to lead to positive effects in the long term.
- 9.56 Positive effects in this respect are also anticipated through Policy BEN14 (Protecting Habitats and Wildlife Corridors) and BEN8 (Development Design) through providing support for biodiversity net-gain (including, for example, *“the creation of new natural habitats including ponds”*). This will contribute positively towards ensuring the village’s wide range of open space, including natural green and blue infrastructure, is maintained and enhanced for a variety of uses; including recreation and relaxation.
- 9.57 A network of high-quality green infrastructure is also considered to lead to positive effects through promoting connectivity and sustainable movement. Bentley residents value their Public Rights of Way (PRoW) network of 64 footpaths and three bridleways and regularly use the rural lanes in Bentley to connect to these. Access to the local countryside contributes to the villagers’ health and well-being in terms of both mental and physical health. In line with Policy BEN19 (Sustainable Transport Infrastructure and Services), proposals therefore *“must demonstrate that safe walking and cycling links to key local services and community facilities including the village pub and shop exist or are capable of being created as part of the development.”*
- 9.58 Delivering improvements to the local footpath network while maintaining the rural character of the village is a priority for residents and is reflected through AECOM’s design guide (2019). Policy BEN8 (Development Design) requires planning applications to take account of the Bentley Design Guide and Design Checklist. Specifically, the design checklist asks *‘does the proposal positively contribute to the quality of the public realm and streetscape?’*
- 9.59 It is also noted that the village is working with Suffolk County Council and other villages to designate some of the narrower lanes which are popular with walkers, cyclists and horse-riders as “Quiet Lanes”. The Suffolk Green Access Strategy addresses access for walking and cycling

on the wider highway network, including footways and quiet lanes. The strategy highlights that *“Green access is key to developing people’s health and wellbeing.”*

- 9.60 In terms of accessibility of the site allocations, Land at the Fruit Farm requires proposals to include pedestrian and cycle access onto Case Lane and visitor car parking. This will support connectivity between the site and the village centre and encourage the uptake of active travel; supporting healthy lifestyles.
- 9.61 Site allocations have reasonably good access to health facilities, with Constable Country Rural Medical Practice is situated just outside of the Neighbourhood Plan area. The closest hospital is in Ipswich (Ipswich General), situated approximately 8.6km from the main settlement, as the crow flies. In terms of wider services and facilities located within the Parish, Policy BEN20 (Protecting Existing Services and Facilities) seeks to ensure that places that serve the needs of Bentley will be encouraged where they contribute to the quality of village life and improve the sustainability of the village. Equally, change of facilities will be supported where proven need for the community is shown; supporting the growth and longevity of the village.
- 9.62 A significant number of residents are of limited mobility, meaning that they need direct access to vehicles from their houses; any inability to park cars outside their own houses, because other residents or visitors have parked in that space, can have a serious impact on quality of life. Policy BEN11 (Parking Standards) therefore seeks to ensure all members of the community have safe, accessible residential parking; requiring *“a minimum of two parking spaces per dwelling, within the curtilage of the dwelling”* for all one, two, and three-bedroom residential developments. Ensuring new development meets the parking needs of residents will support community cohesion, delivering a safe and healthy local environment.
- 9.63 Overall, it is considered that the low level of growth proposed through the Neighbourhood Plan is unlikely to significantly impact on access to healthcare services, or accessibility within and around the village. The Neighbourhood Plan provides support for development that enhances access to and quality of green spaces and green infrastructure networks; supports improvements to local active travel routes; and protects community infrastructure which supports specialist groups. **Residual minor long-term positive effects** are therefore predicted.

## Transportation

- 9.64 Due to its relatively remote location and lack of public transport Bentley has a high level of car ownership. This trend is considered likely to continue given Bentley currently has no public transport that would enable commuting or high street shopping in neighbouring centres. High car ownership currently places pressure on space, particularly given many roads off the main Station/ Capel Road are narrow, single lane and with limited capacity for safe and suitable parking. To ensure road safety and accessibility is not worsened, Policy BEN11 (Parking Standards) requires that *“Development proposals should maintain or enhance the safety of the highway network ensuring that all vehicle parking is designed to be integrated into the site without creating an environment dominated by vehicles.”*
- 9.65 The speed of vehicles along the village’s roads has been highlighted as an issue for the community, particularly the Station/Capel Road forming the main road through the village. This road is used as an emergency cut-through route whenever there is a blockage on the A12 or A137, bringing heavy and unsuitable traffic through the village. In terms of Land at the Fruit Farm, it is considered that gaining vehicular access to the site from Capel Road is likely to necessitate the removal of most of the frontage hedge to provide safe visibility. It is therefore required (as illustrated through the AECOM concept plan for the site) that compensatory tree planting should be provided within the development. Policy BEN4 also requires that proposals *“enable traffic calming on Capel Road and [provide] an extension of the footway to link the site with the village centre.”* This will contribute positively towards mitigating against potential adverse effects, notably facilitating active travel for shorter journeys within the village.
- 9.66 Another key objective for the Neighbourhood Plan is to protect its rural country lanes so that pedestrians (including school children), cyclists, horse riders and other non-motorised vehicle users can continue to use Bentley’s lanes safely for recreation and sustainable travel. Policy

BEN8 (Development Design) therefore sets out support for proposals where they “*will not generate additional vehicles on a designated Quiet Lane such that it would result in that Lane carrying average vehicle movements in excess of 1,000 a day and/or 85th percentile speeds in excess of 35 mph.*”

- 9.67 The need to utilise opportunities to promote the use of public and green transport is reflected through AECOM’s design guide (2019). Policy BEN8 (Development Design) further requires planning applications to take account of the Bentley Design Guide and Design Checklist. Specifically, the design checklist asks; “*Are the new points of access appropriate in terms of patterns of movement?*” and “*do the new points of access and street layout take regard for all users of the development; in particular pedestrians, cyclists and those with disabilities?*”
- 9.68 Bentley residents highly value the vast Public Rights of Way (PRoW) network, and South Suffolk Cycle Route B which extends through the village. Improvements to the local footpath and cycle network is a priority for residents to improve connectivity whilst retaining the village’s rural character. In line with Policy BEN19 (Sustainable Transport Infrastructure and Services), proposals therefore “*must demonstrate that safe walking and cycling links to key local services and community facilities including the village pub and shop exist or are capable of being created as part of the development.*” Ensuring the safety and accessibility of the community, including vulnerable groups will support the long-term sustainability of development; supporting a greater shift towards, active, sustainable travel where possible.
- 9.69 Finally, it is also considered that ensuring that future broadband provision in the village keeps pace with improvements to technology (Policy BEN 23 (Communications Technology) and Policy BEN24 (Broadband)) may lead to increased, long-term levels of working from home. This is likely to reduce road users, particularly at peak times, supporting reduced levels of congestion and improved traffic flow. Positive effects in this respect have the potential to be significant for the village given the current COVID-19 pandemic and the global shift seen to home-working.
- 9.70 Overall, the small-scale growth proposed through the Neighbourhood Plan is not considered likely to lead to any significant negative effects on transport. Design guidelines set out, in addition to the masterplan created for Land at the Fruit Farm, is considered likely to ensure any adverse effects on traffic at Station/Capel Road will be suitably mitigated. The Neighbourhood Plan also supports local improvements to the footpath/ cycle network, green infrastructure delivery, and opportunities to work from home. **Neutral effects** are therefore concluded.

# 10. Conclusions and recommendations

## Conclusions

- 10.1 Overall, the assessment has determined that the current version of the Bentley Neighbourhood Plan is likely to lead to predominately positive effects. **Significant long-term positive effects** are anticipated in relation to population and communities and health and wellbeing through supporting sustainable growth of the community and healthy lifestyles. The Neighbourhood Plan seeks to deliver housing to meet local needs; and ensures the type of housing being developed is likely to support the needs of all sectors of the local community. Further to this the Neighbourhood Plan supports the vitality and viability of the Neighbourhood area through the protection and enhancement of the high-quality public realm, community infrastructure, and access to local services (including health services).
- 10.2 **Minor positive effects** are predicted for biodiversity and climate change given the Neighbourhood Plan policy framework sets out a number of requirements which support local and national climate change objectives/ targets. Notably the premise for biodiversity protection, enhancement, and net gain embedded through the Neighbourhood Plan policy framework will lead to positive effects directly and indirectly for biodiversity and climate change respectively.
- 10.3 **Neutral effects** are anticipated in relation to the landscape and historic environment SEA themes. Proposed growth in the parish has been underpinned by evidence to ensure development maintain and where possible enhance Bentley's historic assets, landscape features and local villagescape; and maintain the characteristic rural setting of the AONB.
- 10.4 **Neutral effects** are also anticipated in relation to the transportation theme. Any adverse effects at Station/ Capel road are anticipated to be suitably mitigated, and the plan sets out support for local transport improvements, green infrastructure gains, and possible reduced car use.
- 10.5 **Minor negative effects** are predicted in relation to land, soil and water resources given proposed site allocations will result in the loss of greenfield, BMV agricultural land (although it is noted that development at Land at Oakleigh would take place with or without the Neighbourhood Plan). It is however noted that the effects in relation to agricultural land resources are **uncertain** until site-level assessments can determine precise soil quality at the site. Furthermore, these effects are considered likely under any growth scenario or alternative site options, given a lack of available options within areas of brownfield or lower quality agricultural land.

## Cumulative effects

- 10.6 Cumulatively the Bentley NP seeks to complement the provisions of the emerging Joint Local Plan by; allocating land to meet residual housing needs, seeking development proposals which contribute to the locally required mix of housing types and tenures, and supporting delivery of high-quality development which complements its setting, settlement form and village identity.
- 10.7 The growth proposed through the NDP may slightly exceed that currently planned for in the emerging Joint Local Plan which could increase the cumulative recreational pressures placed on internationally designated biodiversity. However, the provisions of the Suffolk Coast RAMS should ensure that cumulative effects are not significant.
- 10.8 It is recognised that cumulatively, growth across the district will occur within the setting of the AONB. The supplementary evidence provided through the Bentley NP in relation to design principles and masterplanning in Bentley is likely to cumulatively support the AONB and its Management Plan aims to protect the integrity and special qualities of the nationally valued landscape.
- 10.9 Cumulative positive effects are therefore anticipated overall.

## Recommendations

10.10 Following initial assessment of the Neighbourhood Plan, it was recommended that the site allocations policies (BEN3 and BEN4) be revised to consider the landscape, historic environment, and transport implications of new development. Specifically, it was recommended that the supporting text requirement for *“all existing mature trees along the Capel Road frontage and the site boundary planting shall be retained”*, should be moved into policy. Given the accessibility issues at Capel Road, the policy requirement could be adjusted to *“retain trees where possible and deliver suitable replantation where access provision is made, and retention is not possible”* to increase the weight of the requirement and strengthen the policy framework overall. This recommendation has now been incorporated into the Plan.

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

# 11. Next steps

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

## Plan finalisation

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

11.3 Assuming that the examination leads to a favourable outcome, the Neighbourhood Plan will then be subject to a referendum, organised by Babergh District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once 'made', the Bentley Neighbourhood Plan will become part of the Development Plan for Babergh District, covering the defined Neighbourhood Plan Area.

## Monitoring

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

11.5 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by Babergh District 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 Bentley NP that would warrant more stringent monitoring over and above that already undertaken by Babergh District Council.



# Appendix A Regulatory requirements

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

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

		Questions answered	As per regulations... the Environmental Report must include...
<b>Introduction</b>	What's the plan seeking to achieve?		<ul style="list-style-type: none"> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
	What's the SEA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> <li>Relevant environmental protection objectives, established at international or national level</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> <li>Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> <li>The environmental characteristics of areas likely to be significantly affected</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> <li>Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment</li> </ul>
<b>Part 1</b>	What has plan-making / SEA involved up to this point?		<ul style="list-style-type: none"> <li>Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>The likely significant effects associated with alternatives</li> <li>Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan</li> </ul>
<b>Part 2</b>	What are the SEA findings at this current stage?		<ul style="list-style-type: none"> <li>The likely significant effects associated with the draft plan</li> <li>The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan</li> </ul>
<b>Part 3</b>	What happens next?		<ul style="list-style-type: none"> <li>A description of the monitoring measures envisaged</li> </ul>

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

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

**Table AA.2: 'Checklist' of how (throughout the SA process) and where (within this report) regulatory requirements have been, are and will be met.**

Regulatory requirement	Discussion of how requirement is met
<b>Schedule 2 of the regulations lists the information to be provided within the SA Report</b>	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 ('What is the plan seeking to achieve') presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters have been considered in detail through scoping work, which has involved dedicated consultation on a Scoping Report. The 'SEA framework' – the outcome of scoping – is presented within Chapter 3 ('What is the scope of the SEA?'). More detailed messages, established through a context and baseline review are also presented in Appendix B of this Environmental Report.
3. The environmental characteristics of areas likely to be significantly affected;	
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The SEA framework is presented within Chapter 3 ('What is the scope of the SEA'). Also, Appendix B presents key messages from the context review. With regards to explaining " <i>how...considerations have been taken into account</i> ", Chapter 7 explains the Steering Group's 'reasons for supporting the preferred approach', i.e. explains how/ why the preferred approach is justified in light of alternatives appraisal.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapter 6 presents alternatives appraisal findings (in relation to housing growth, which is a 'stand-out' plan policy area). Chapters 9 presents an appraisal of the plan. With regards to assessment methodology, Chapter 8 explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g. timescale.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The assessment highlights certain tensions between competing objectives, which might potentially be actioned by the Examiner, when finalising the plan. Also, specific recommendations are made in Chapter 10.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 4 and 5 deal with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues and options. Also, Chapter 7 explains the Parish Council's 'reasons for selecting the preferred option' (in-light of alternatives assessment).
9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 11 presents measures envisaged concerning monitoring.
10. A non-technical summary of the information provided under the above headings	The NTS is provided at the beginning of this Environmental Report.
<b>The SA Report must be published alongside the Draft Plan, in accordance with the following regulations</b>	
authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the	At the current time, this Environmental Report is published alongside the 'submission' version of the Bentley Neighbourhood Plan, with a view to informing Regulation 16 consultation.

**Regulatory requirement****Discussion of how requirement is met**

accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)

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**The SA must be taken into account, alongside consultation responses, when finalising the plan.**

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The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.

Assessment findings presented within this Environmental Report, and consultation responses received, have been fed back to the Steering Group and have informed plan finalisation.

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# Appendix B Scoping information

## Air quality

### Context review

#### National

The UK's Air Quality Strategy<sup>10</sup> details a long-term vision for improving air quality in the UK, which involves objectives and policies for the different pollutants and the environmental implications associated with these.

Key messages from the National Planning Policy Framework<sup>11</sup> (NPPF) include:

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

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

The Clean Air Strategy 2019<sup>12</sup> identifies how government will tackle all sources of air pollution and is aimed at complementing the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan. The strategy proposes new goals to cut public exposure to particulate matter pollution and sets out the comprehensive action that is required from across all parts of government and society to meet these goals. The proposed measures include new legislation and new local powers to take action in areas with an air pollution problem, including through the creation of 'Clean Air Zones'.

The government published the 'UK plan for tackling roadside nitrogen dioxide concentrations' in July 2017.<sup>13</sup> This is the air quality plan for bringing nitrogen dioxide within statutory limits in the shortest possible time. The plan identifies that "the link between improving air quality and reducing carbon emissions is particularly important" and that consequently the UK government is determined to be at the forefront of vehicle innovation by making motoring cleaner.

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<sup>10</sup> DEFRA (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf)

<sup>11</sup> MHCLG (2019) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_w eb.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_w eb.pdf)

<sup>12</sup> DEFRA et al. (2019) Clean Air Strategy 2019 [online] available from: <https://www.gov.uk/government/publications/clean-air-strategy-2019>

<sup>13</sup> DEFRA (2017) 'UK plan for tackling nitrogen dioxide concentrations' [online], available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/633269/air-quality-plan-overview.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-plan-overview.pdf)

Published in January 2018 by the UK Government, 'A Green Future: Our 25 Year Plan to Improve the Environment'<sup>14</sup> sets out a number of goals and policies in order to help the natural world regain and retain good health. In this context, Goal 1 'Clean Air' and the policies contained within 'Chapter 4: Increasing resource efficiency and reducing pollution and waste' within the 25 year plan directly relate to the air quality SEA theme.

## Local

Local Planning Authorities are required to monitor air quality across their administrative area under Section 82 of the Environment Act (1995), report regularly to Defra and take action where nationally set levels are likely to be exceeded. Monitoring is undertaken to assess levels of nitrogen dioxide (NO<sub>2</sub>), sulphur dioxide, ozone, benzene and particulates. Where exceedances exist, areas are declared as Air Quality Management Areas (AQMAs) and local authorities are required to produce an Air Quality Action Plan (AQAP) to improve air quality in the area.

In the context of Bentley Parish, while no AQAP exists for Babergh District, the latest Air Quality Action Plan (AQAP) for neighbouring authority Ipswich Borough is of relevance. Notably, the Ipswich AQAP (2019 – 2024)<sup>15</sup> identifies as a key measure, the need to coordinate the delivery of green travel plans between Suffolk County Council, Mid Suffolk and Babergh District Council. This is with the intention of promoting travel alternatives and reducing the need to travel every day.

A number of policies within the Babergh Local Plan Core Strategy indirectly relate to the air quality theme, including:

- CS15 Implementing Sustainable Development in Babergh;
- CS12 Sustainable Design and Construction Standards;
- CS14 Green Infrastructure; and
- CS21 Infrastructure Provision.

The emerging Joint Local Plan proposes Policies SP08 (Strategic Infrastructure Provision), and LP17 (Environmental Protection) which provide further support for improved air quality across the district areas.

## Baseline review

### Current baseline

In line with the Local Air Quality Management (LAQM) as set out in Section 82 of the Environment Act (1995), Babergh District Council is required to assess Air Quality standards within the region on an annual basis.

There are no Air Quality Management Areas (AQMAs) within Bentley Parish. The closest are the five Ipswich AQMAs, located approximately 6km north east of the parish boundary within Ipswich city centre:

- Ipswich AQMA No. 1 – declared 11/04/2006
- Ipswich AQMA No. 2 – declared 11/04/2006
- Ipswich AQMA No. 3 – declared 11/04/2006
- Ipswich AQMA No. 4 – declared 14/12/2010
- Ipswich AQMA No. 5 – declared 12/09/2017

All AQMAs have been designated as a result of NO<sub>2</sub> exceedances.<sup>16</sup>

<sup>14</sup> HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

<sup>15</sup> Ipswich Borough Council (2019) Ipswich Borough Council Air Quality Action Plan 2019 – 2024 [online] available at: [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/air\\_quality\\_action\\_plan\\_2019\\_-\\_executive\\_approved\\_pdf\\_version.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/air_quality_action_plan_2019_-_executive_approved_pdf_version.pdf)

<sup>16</sup> Department for Environment Food & Rural Affairs (date unknown) UK Air – Air Information Resource [online] available at: [https://uk-air.defra.gov.uk/aqma/local-authorities?la\\_id=133](https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=133)

## Future baseline

New housing and employment provision within the parish has the potential for adverse effects on air quality through increasing traffic flows and associated levels of pollutants such as NO<sub>2</sub>. Traffic and congestion arising from new development within the area has the potential to increase emissions and reduce air quality in sensitive locations, such as the Ipswich AQMAs.

The Bentley Neighbourhood Plan proposes low levels of additional growth that are unlikely to significantly affect AQMAs in nearby Ipswich. Further, it is recognised that the Bentley Neighbourhood Plan policy framework itself provides an opportunity to improve public realm and the movement of pedestrians and cyclists, thus encouraging more local journeys and sustainable connections.

## Key issues and opportunities

The following key issues emerge from the context and baseline review:

- There are no AQMAs declared within the Neighbourhood Plan Area, however Ipswich nearby does contain 5 AQMAs which are sensitive to increases in traffic flows. Given the close connections and service role of Ipswich in relation to Bentley, there is a potential for development in Bentley to affect congestion in Ipswich. However, low levels of additional growth are being proposed through the Bentley Neighbourhood Plan (less than 20 additional dwellings) such that the potential for significant effects is notably diminished.

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

## Biodiversity

### Context review

#### National

Key messages from the National Planning Policy Framework<sup>17</sup> (NPPF) include:

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

<sup>17</sup> MHCLG (2019) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)



- Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.
- Take a proactive approach to mitigating and adapting to climate change, considering the long-term implications for biodiversity.
- The presumption in favour of sustainable development does not apply where development requiring appropriate assessment because of its potential impact on a habitats site is being planned or determined.

The Government's 25 Year Environment Plan<sup>18</sup> (2018) sets out a strategy for managing and enhancing the natural environment, embedding 'net gain' principles as key to environmental considerations. These aims are supported by a range of policies which are focused on six key areas. In this context, Goal 3 'Thriving plants and wildlife' and the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Chapter 5 'Securing clean, productive and biologically diverse seas and oceans' directly relate to biodiversity and geodiversity.

The Biodiversity 2020 Strategy<sup>19</sup> (2011) presents a strategy for England's wildlife and ecosystem services which builds on the Natural Environment White Paper<sup>20</sup> and sets out the "strategic direction for biodiversity for the next decade". The strategy aims to halt biodiversity loss and improve ecological networks and ecosystems for all people.

The UK Biodiversity Action Plan<sup>21</sup> (BAP) identifies priority species and habitats requiring conservation action. Although the UK BAP has been superseded, BAP priority species and habitats have been used to draw up statutory lists of priority species and habitats in England.

## Local

The Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) is a partnership between East Suffolk Council, Ipswich Borough Council and Babergh and Mid Suffolk District Councils. Its aim is to reduce the impact of increased levels of recreational use on Habitat Sites (also often called European Sites), due to new residential development in the Suffolk Coast area, and to provide a simple, coordinated way for developers to deliver mitigation for their developments.

The RAMS project allows for a strategic approach to mitigating the in-combination effects of development on these designated areas and allows mitigation to be delivered across the project area.

Babergh Local Plan Core Strategy Policy CS14 'Green Infrastructure' relates directly to the biodiversity theme. The emerging Babergh and Mid Suffolk Joint Local Plan Policy SP09 'Enhancement and Management of the Environment' also directly relates to this theme.

## Baseline review

### Current baseline

#### European designated sites

There are no internationally designated nature conservation sites within Bentley Parish. However, the Neighbourhood Plan area is located within the 13km "Zone of Influence" of the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site, located to the east of the settlement.

The Stour and Orwell estuaries straddle the eastern part of the Essex/ Suffolk border in eastern England. The estuaries include extensive mud-flats, low cliffs, saltmarsh and small areas of vegetated shingle on the lower reaches. The mud-flats hold *Enteromorpha*, *Zostera* and *Salicornia* spp. The site also includes an area of low-lying grazing marsh at Shotley Marshes on the south side of the Orwell. In summer, the site supports important numbers of breeding *Avocet Recurvirostra*

<sup>18</sup> HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/673203/25-year-environment-plan.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf)

<sup>19</sup> Defra (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services [online] available at: <https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>

<sup>20</sup> Defra (2012) The Natural Choice: securing the value of nature (Natural Environment White Paper) [online] available at: <http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>

<sup>21</sup> JNCC (2007) UK BAP priority species [online] <http://archive.jncc.gov.uk/page-5717>

*avosetta*, while in winter they hold major concentrations of waterbirds, especially geese, ducks and waders. The geese also feed, and waders roost, in surrounding areas of agricultural land outside the SPA. The site has close ecological links with the Hamford Water and Mid-Essex Coast SPAs, lying to the south on the same coast.<sup>22</sup>

### Suffolk Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS)

In 2016, Natural England identified the Suffolk coast as a priority for strategic and proactive planning engagement and mitigation.

The Suffolk Coast Recreation disturbance Avoidance and Mitigation Strategy (RAMS) partnership (East Suffolk Council, Ipswich Borough Council and Babergh and Mid Suffolk District Councils) was subsequently formed with the aim of reducing the impact of increased levels of recreational use on European Sites due to new residential development in the Suffolk Coast area, and to provide a simple, coordinated way for developers to deliver mitigation for their developments.

RAMS applies within the identified Zone of Influence (ZOI) - the area where increased residential development will result in likely significant effects. As set out in the strategy, evidence shows that there is a 13 km Zone of Influence (ZOI) around the relevant European Sites in the Suffolk Coast area (this includes East Suffolk, Ipswich Borough and Babergh and Mid Suffolk Council areas - i.e. including the Neighbourhood Plan area).

Increased recreation without mitigation could result in the significant features of the sites being degraded or lost. In turn, these internationally important areas could lose their birds and habitat, (and therefore their designations), and the Suffolk Coast could lose significant important areas for birds, plants and wildlife generally.

Any new residential development within the ZOI will be required to mitigate the effects of the development and show how this will be achieved prior to approval of planning permission. In smaller development this is most efficiently achieved through payment of the RAMS contribution only. For sites comprising of more than 50 dwellings and in more sensitive locations, a bespoke approach including payment of RAMS and demonstration of on-site/ off-site mitigation measures may be required. The Suffolk Coast RAMS Habitat Regulation Assessment (HRA) provides guidance in this respect, as agreed with Natural England.

### Nationally designated sites

There are no nationally designated nature conservation sites within Bentley Parish, however Freston and Culter's Woods With Holbrook Park Site of Special Scientific Interest (SSSI) is located approximately 800m east of the parish. **Freston and Culter's Woods with Holbrook Park SSSI** was notified in 1986 and is 142ha in size. Based on the most recent condition assessment the SSSI is classed as:

- 61.23% Unfavourable – Recovering
- 42.74% Unfavourable – No change
- 12.31% Unfavourable - Declining

The citation for the SSSI states:<sup>23</sup>

*“These woods together comprise one of the largest areas of ancient woodland in Suffolk. They contain a variety of woodland types typical of light, sandy soil and spring-fed valleys. There is a long history of management which includes the creation of a deer park and the medieval introduction of Sweet Chestnut *Castanea sativa*, a tree more commonly planted in Kent and Essex. The coppice stools in Holbrook Park are amongst the largest recorded in Britain with many stools exceeding 3m in diameter. The woods support a distinctive ground vegetation and are among the best Bluebell *Hyacinthoides non-scriptus* woods in Suffolk.”*

The parish falls within Impact Risk Zones (IRZs) for the SSSI where residential development of 50 dwellings or more will require further consultation with Natural England. However, it is noted that the

<sup>22</sup> Place Services (2020)

<sup>23</sup> Natural England (2020) Designated sites - Freston and Cutlers Woods with Holbrook Park [online] available at: <https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1004157.pdf>

low level of additional growth proposed through the Draft Regulation 14 version of the Neighbourhood Plan does not reach this threshold.

### Ancient woodland

Bentley's ancient woodlands are encompassed in the South Suffolk Ancient Woodlands Cluster<sup>24</sup> and are designated County Wildlife Sites (CWSs). These woodlands are well known for their spring display of bluebells. The native Bluebell is just one of 16 species of ancient woodland flora that have been recorded in these woods.

### Locally designated sites

There are a number of designated County Wildlife Sites (CWSs) and Local Wildlife Sites (LWSs) within the Parish, and these are known locally generally coincide with Ancient Woodland and priority habitats.

### Priority habitats and species

Bentley's protected habitats and species have been recorded to inform the development of the Neighbourhood Plan. These are listed below (including numbers):

- Amphibians: Toad, Smooth Newt (2)
- Reptiles: Adder, Grass Snake, Slowworm, Common Lizard (4)
- Birds: (95)
- Mammals: Bat species (7), Badger, Otter, Hare, Hedgehog, Dormouse, Harvest Mouse Water Shrew (total 14)
- Dragonflies and Damselflies: Variable Damselfly, Scarce Emerald Damselfly (2)
- Butterflies: White Admiral, White letter Hairstreak (2)
- Moths: (24)
- Bees: Large Gorse Mining Bee, Ridge-saddled Carpenter Bee (2)
- Beetles: European Stag Beetle + 21 others (22)
- Plants (other than trees): Bluebell, Bee Orchid, Early-purple Orchid, Heath Speedwell, Eyebright, Field Scabious, Heather, Wild Strawberry, Common Valerian, Tormentil, Wood Sorrel, Stinking Chamomile, Corn Mint, Corn Spurrey, Yellow-glandular Hawkweed, Wood Spurge, Pillwort, Butchers Broom, Common Cudweed, Mousetail (20).
- Trees: Native Black Poplar (1).
- Habitats: Coastal and flood plain grazing marsh, deciduous woodland, ancient woodland, good quality semi-improved grassland, and traditional orchards.

Of note in relation to the list above, Bentley parish is a hotspot for both dormice and stag beetles. Breeding Hazel dormice, a legally protected and Priority species, are present in all of Bentley's ancient woodlands and several of its ancient hedgerows. Disturbance of this species is not permitted. Stag beetles, which are classified as 'near threatened' by Natural England and a Priority Species in the UK and Suffolk Biodiversity Action Plan, inhabit the woodland edges where they receive more sunlight. This flagship species breeds throughout the parish, its subterranean larvae feeding on underground decaying wood of hedgerows, trees, and shrubs in varied habitats including residents' gardens.

### Future baseline

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

<sup>24</sup> Suffolk County Council (2014): 'Suffolk Nature Strategy' [online] available at: <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/suffolks-countryside-and-wildlife/Suffolks-Nature-Strategy-2015.pdf>

County Wildlife Sites act as wildlife corridors and have the potential to be impacted by new development which can remove the connection between habitats for species such as birds. Ecological sites can also be impacted by poor air quality and water quality, and factors such as noise and lighting can disturb vulnerable species.

New residential development within the parish also has the potential to impact upon the Stour and Orwell Estuaries SPA and Ramsar site as a result of recreational disturbance in combination with other plans and projects. Any future development will be required, through the RAMS, to set out mitigation to avoid adverse impacts on the integrity of the European site(s).

In addition to mitigating against adverse effects, the Neighbourhood Plan also presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species and designated sites at an early stage of planning for future growth. To maintain and improve the condition of biodiversity in the future, it will be important to not only protect priority habitats but to enhance the connections between them; utilising opportunities for net-gain where possible. It will be crucial to effectively coordinate the delivery of housing, employment and infrastructure to ensure that opportunities to improve green infrastructure and ecological corridors are maximised, both within the Plan area and in the surrounding areas.

## Key issues and opportunities

The following key issues emerge from the context and baseline review:

- The Neighbourhood Plan area falls within the 13km 'Zone of Influence' (Zol) for the Stour and Orwell Estuaries SPA and Ramsar site. In accordance with the Suffolk Coast RAMS (and Natural England), residential development in the Zol will require mitigation to avoid adverse impacts on the integrity of the habitats within scope through increased recreational pressure. Potential effects will need to be considered both alone and in combination with other plans and projects.
- The County Wildlife Sites and Local Wildlife Sites and habitats within the Plan area host a variety of plant and animal species that contribute to biodiversity and support ecological connectivity. These areas should be retained and enhanced in development.
- New development provides opportunities to enhance ecological connections in the Plan area and deliver demonstrable biodiversity net gains.

## Climate change

### Context review

#### National

Key messages from the National Planning Policy Framework<sup>25</sup> (NPPF) include:

- Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.
- Inappropriate development in areas at high risk of flooding should be avoided by directing development away from areas of highest risk (whether existing or future).
- Strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources.

<sup>25</sup> MHCLG (2019) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_w eb.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_w eb.pdf)

- Plans should take account of the effects of climate change in the long term, considering a range of factors including flooding. Adopt proactive strategies to adaptation and manage risks through adaptation measures including well planned green infrastructure.
- Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbate the impacts of physical changes to the coast.

One of the three overarching objectives of the NPPF is an environmental objective to 'contribute to protecting and enhancing our natural, built and historic environment' including by 'mitigating and adapting to climate change' and 'moving to a low carbon economy.' 'The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

The Flood and Water Management Act (2010)<sup>26</sup> sets out measures to ensure that risk from all sources of flooding, not just rivers and seas, are managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; roll back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

The UK Climate Change Act<sup>27</sup> was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement.

The Climate Change Act includes the following:

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

The Committee of Climate Change published a 2012 report entitled 'How Local Authorities Can Reduce Emissions and Manage Climate Change Risk'<sup>28</sup> which emphasises the crucial role councils have in helping the UK meet its carbon targets and preparing for the impacts of climate change. It

<sup>26</sup> Flood and Water Management Act (2010) [online] available at: <http://www.legislation.gov.uk/ukpga/2010/29/contents>

<sup>27</sup> HM Government (2008): 'Climate Change Act 2008' [online] available at: <http://www.legislation.gov.uk/ukpga/2008/27/contents>

<sup>28</sup> CCC (2012) 'How local authorities can reduce emissions and manage climate risks' [online] available at: <https://www.theccc.org.uk/publication/how-local-authorities-can-reduce-emissions-and-manage-climate-risks/>

outlines specific opportunities for reducing emissions and highlights good practice examples from local authorities.

The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report<sup>29</sup> containing six priority risk areas requiring additional action in the next five years:

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

The Clean Air Strategy<sup>30</sup> released in 2019 sets out the Government plans for dealing with all sources of air pollution. The strategy sets out proposals in detail and indicates how devolved administrations intend to make their share of emissions reductions, and complements the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan.

The Committee of Climate Change published a 2012 report entitled 'How Local Authorities Can Reduce Emissions and Manage Climate Change Risk'<sup>31</sup> which emphasises the crucial role councils have in helping the UK meet its carbon targets and preparing for the impacts of climate change. It outlines specific opportunities for reducing emissions and highlights good practice examples from Local Authorities.

Department for Transport (2020) Decarbonising Transport: Setting the Challenge (2020)<sup>32</sup> sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050.

In February 2020, the government announced a new £5 billion 5-year funding package to overhaul bus and cycle links for every region outside London.<sup>33</sup> This builds on the Government's determination to make buses work better for their passengers. The details of these programmes will be announced in the upcoming National Bus Strategy, to be published later in 2020, and follows the allocation of £170 million to support more electric buses, increase rural mobility and trial new 'Superbus' services.

Cycle routes will also see a major boost across the country with over 250 miles of new, high-quality separated cycle routes and safe junctions in towns and cities to be constructed across England, as part of the multibillion pound package announced.

<sup>29</sup> DEFRA (2017) 'UK Climate Change Risk Assessment Report January 2017' [online] available at: <https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017>

<sup>30</sup> HM Gov (2019) Clean Air Strategy 2019 [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/770715/clean-air-strategy-2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf)

<sup>31</sup> CCC (2012) 'How local authorities can reduce emissions and manage climate risks' [online] available at: <https://www.theccc.org.uk/publication/how-local-authorities-can-reduce-emissions-and-manage-climate-risks/>

<sup>32</sup> Department for Transport (2020) Decarbonising Transport: Setting the Challenge [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/876251/decarbonising-transport-setting-the-challenge.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/876251/decarbonising-transport-setting-the-challenge.pdf)

<sup>33</sup> Department for Transport (2020) Major boost for bus services as PM outlines new vision for local transport [online] available at: <https://www.gov.uk/government/news/major-boost-for-bus-services-as-pm-outlines-new-vision-for-local-transport>

### Local

The Suffolk Climate Action Plan sets out the ambition to continue working towards a target of reducing carbon emissions by 60% by 2025, alongside strategies for a “credible pathway” for doing so.<sup>34</sup>

The Babergh Local Plan Core Strategy outlines policies aimed at mitigating carbon emissions, including:

- Policy CS12, Sustainable Design and Construction Standards; and
- Policy CS13, Renewable/Low Carbon Energy.

Additionally, policy SP10 (Climate Change) of the emerging Babergh and Mid Suffolk Joint Local Plan directly relates to this theme.

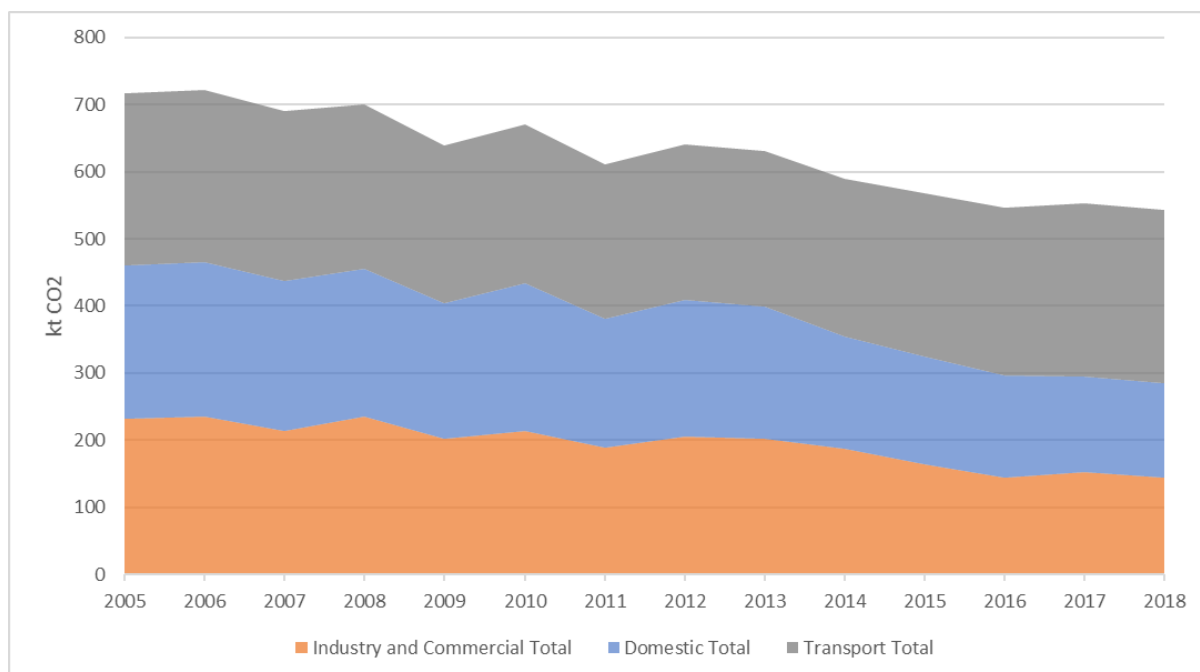
## Baseline review

### Current baseline

#### Climate change mitigation

As shown in **Figure AB.1**, the largest contributing sector of CO<sub>2</sub> emissions in Babergh District in 2018 was the Transport sector (47.5% of total), which has been the case since 2005.

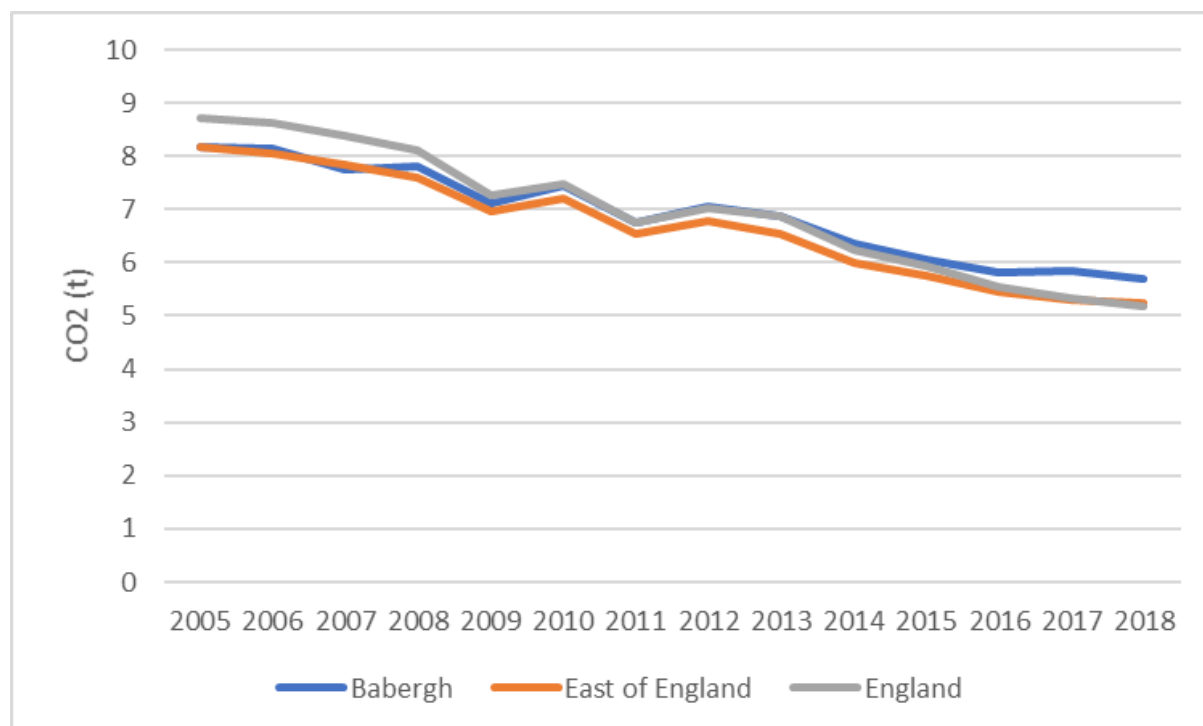
**Figure AB.1: CO<sub>2</sub> emissions (kt) per sector (2005- 2018) in the Babergh District**



**Figure AB.2** (overleaf) presents data over the period 2005- 2018 relating to CO<sub>2</sub> emissions.<sup>35</sup> In this regard, CO<sub>2</sub> emissions in Babergh District are higher than comparative figures for the East of England and England as a whole. Additionally, CO<sub>2</sub> levels have decreased at a slower rate between 2016-2018 in Babergh District (-2.0%) in comparison to regional (-3.8%) and national figures (-6.2%).

<sup>34</sup> Suffolk Climate Action Plan, available at: <http://www.greensuffolk.org/assets/Greenest-County/SCCP/Climate-Change/Suffolk-Climate-Action-Plan-2-FINAL.pdf>

<sup>35</sup> Department of Energy and Climate Change (2019) '2005 to 2017 UK local and regional CO2 emissions – data tables' [online] available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2017>

**Figure AB.2: Carbon dioxide emissions (t) 2005 – 2018**

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

Electric vehicles (EVs) do not burn fuel and create almost no noise. They are battery powered and have the potential to be 'zero-emission vehicles' (ZEVs) if powered by renewable electricity. As of May 2020, 0.16% of vehicles in Suffolk County are fully electric and there are 120 charging points across the County. In terms of the Neighbourhood Plan area, there are a small number of charging points located within 2km of the Plan border. However, within 5km of the Plan border, there are a greater number of charging points, particularly in the Ipswich centre.

The Suffolk Climate Emergency Plan (2020) sets out "Encouraging greater take-up of public transport and active travel (walking and cycling) and a massive roll-out of zero emissions vehicles" as a key priority for local action.<sup>36</sup>

Reducing greenhouse gas (GhG) emissions is widely acknowledged as a key element of climate change mitigation. CO<sub>2</sub> emissions in particular are associated with a changing climate and will become an area of even greater focus for mitigating climate change following Babergh District Council's declaration of a climate emergency in 2019, and pledge to make its activities, as far as possible, carbon neutral by 2030

### Renewable energy

The Department for Business, Energy and Industrial Strategy publishes annual statistics on renewable energy generation, disaggregated by Local Authority. The most recently published data is for 2018 and shows that Babergh has a total renewable energy installed capacity of 14.0 megawatts (see **Table AB.1**). Renewable energy generation has grown in Babergh between 2014 and 2018 by 86.7%, predominately as a result of significant increase in photo-voltaics (PV), i.e. solar panels.

<sup>36</sup> Ricardo Energy & Environment (2020) Suffolk Climate Emergency Plan Technical Report [online] available at: <http://www.greensuffolk.org/assets/Greenest-County/SCCP/SCCP/Misc/2020-06-01-REE-SCEP-Technical-Report-FINAL.pdf>



**Table AB.1 Renewable energy installed capacity (MW) in the Babergh District (2014- 2018)<sup>37</sup>**

	Photo-voltatics	Onshore Wind	Hydro	Anaerobic Digestion	Offshore Wind	Wave /Tidal	Sewage Gas	Landfill Gas	Municipal Solid	Biomass	Animal biomass	Plant biomass	Cofiring	Total
<b>2014</b>	7.5	0.1	-	0.5	-	-	-	0.1	-	-	-	-	-	<b>7.5</b>
<b>2018</b>	12.6	0.0	-	1.2	-	-	-	0.1	-	-	-	-	-	<b>14.0</b>

### Climate change adaptation

Research on the probable effects of climate change in the UK was released in 2018 by the UK Climate Projections (UKCP18) team. UKCP18 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

As highlighted by the research, the effects of climate change for the East of England by 2050 in a 'medium emissions' scenario are likely to be as follows:

- An increase in winter mean temperature of 2.2 °C and an increase in summer mean temperature of 2.8 °C;
- A change in winter mean precipitation greater than +10% and summer mean precipitation greater than -10%.

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

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

### Flood risk

11.6 As shown in **Figure AB.3** overleaf, fluvial flood risk in the Neighbourhood Plan area is greatest east of the railway line and at the southern border of the Plan area around Stutton Brook.

<sup>37</sup> DBEIS (2018), Regional Renewable Statistics [online] available at: <https://www.gov.uk/government/statistics/regional-renewable-statistics>



**Figure AB.5 Bentley resident canoeing on Church Road**

### Future baseline

In line with UK trends and national commitments, emissions are likely to continue to fall as energy efficiency measures, renewable energy take-up and new technologies, such as EVs and solar PV, become more widely adopted. Notably, the Government has consulted on changes to England's Building Regulations introducing a 'Future Homes Standard' and the Department for Transport recently published 'Decarbonising Transport; setting the challenge' a first step towards publishing a full transport decarbonisation plan.

In the future, new development could 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. It is further recognised that climate change has the potential to increase the occurrence of extreme weather events such as enhanced precipitation, which can increase surface water runoff, for example from Stutton Brook. This has the potential to put residents, property and development at a high risk of flood exposure.

However, in line with the NPPF (2019) sequential testing is likely to ensure that development within areas at highest risk of flooding is largely avoided, and development is likely to deliver mitigation such as Sustainable Drainage Systems (SuDS).

## Key issues and opportunities

The Plan area is partially affected by areas of high fluvial flood risk, however these areas do not infiltrate the main settlement of Bentley, so are unlikely to pose a substantial risk with regards to development. Surface water flooding at Church road has the potential to pose a risk to future housing development and development should consider appropriate mitigation, including the use of the sustainable drainage systems.

CO<sub>2</sub> emissions for Babergh have steadily declined over the period of 2005- 2018, in line with regional and national statistics, but at a slightly slower rate. Given that the transport sector is the largest contributor to emissions in the District, any development in the Plan area should consider the need to provide access to sustainable or low carbon travel options, that meet the needs of consumers and improves mobility, whilst also reducing emissions.

Babergh District Council has recently declared a climate emergency and has resolved to support local authorities (and, by extension, Neighbourhood groups) to help tackle climate change through plan-making where possible. The Neighbourhood Plan should seek to maximise opportunities to support Council actions in tackling climate change. This may include through encouraging renewable energy technologies in small-scale developments in the Parish; i.e solar PV and water heating, continuing the upward trend seen across the district (**Table AB.1** above).

## Landscape

### Context review

#### National

Key messages from the National Planning Policy Framework<sup>40</sup> (NPPF) include:

- Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty [...]. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.
- Strategic policies should set out an overall strategy making provision for ‘conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.
- Planning policies and decisions should ensure that developments ‘are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).
- Planning policies and decisions should contribute to and enhance the natural and local environment by:
  - protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils;
  - recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and
  - remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
- The government attaches great importance to Green Belts, whose fundamental aim is to prevent urban sprawl by keeping land permanently open. The general extent of Green

<sup>40</sup> MHCLG (2019) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_w eb.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_w eb.pdf)

Belts is established and can only be altered in exceptional circumstances through preparation or review of a Local Plan.

The national design guide (2019)<sup>41</sup> sets out the characteristics of well-designed places and demonstrates what good design means in practice. It is based on national planning policy, practice guidance and objectives for good design as set out in the National Planning Policy Framework. Specific, detailed and measurable criteria for good design are most appropriately set out at the local level.

National Character Area (NCA) profiles are published by Natural England and divide England in 159 distinct natural areas based on their landscape, biodiversity, geodiversity, historic, cultural and economic characteristics.<sup>42</sup> NCAs follow natural features in the landscape and are not aligned with administrative boundaries. NCA profiles describe the features which shape each of these landscapes, providing a broad context to its character.

The Government's 25 Year Environment Plan<sup>43</sup> states the intention to work with relevant authorities to deliver environmental enhancements within all 159 NCAs across England. Along with the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes', Goal 6 'Enhanced beauty, heritage and engagement with the natural environment' of the Government's "A Green Future: Our 25 Year Plan to Improve the Environment" directly relates to the Landscape.

## Local

The Suffolk Landscape Character Assessment (2011) identifies landscape typologies across the County at a highly localised scale.<sup>44</sup>

The Joint Babergh and Mid Suffolk Landscape Character Guidance (2015) provides further evidence of local landscape sensitivities and identifies key character features at a settlement-specific scale.<sup>45</sup>

A number of policies within the Babergh Local Plan Core Strategy indirectly relate to the landscape theme, including:

- CS2 Settlement Pattern Policy; and
- CS14 Green Infrastructure

Further, Policy LP19 in the emerging Joint Local Plan directly relates to the landscape theme.

## Baseline review

### Current baseline

Bentley is a rural settlement in the setting of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB). The draft Bentley Neighbourhood Plan identifies that the visual origins of Bentley village as a dispersed settlement pattern are still evident in form of the village which has no historic centre but a sequence of small focal points such as the pub, war memorial and station. The cul-de-sac developments have a relatively uniform character with a number comprising just single storey dwellings. These areas contrast with the more eclectic mix of housing along the historic lanes which run perpendicular to the main road and include a range of houses dating to different periods. These lanes also retain a rural character often with no footpaths, kerbs or street lighting. Due to new infill housing being accessed off the main road through the village, the rural and eclectic character of the perpendicular lanes remains intact and forms an important characteristic of the village.

### Suffolk Coast & Heaths AONB

<sup>41</sup> MHCLG (2019) National Design Guide [online] available at: <https://www.gov.uk/government/publications/national-design-guide>

<sup>42</sup> Natural England (2012) 'National Character Area profiles' [online] <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

<sup>43</sup> HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

<sup>44</sup> Suffolk County Council (2011), 'Suffolk Landscape Character Assessment' [online], available from: [http://www.suffolklandscape.org.uk/landscape\\_typology.aspx](http://www.suffolklandscape.org.uk/landscape_typology.aspx)

<sup>45</sup> Babergh District Council (2015), 'Joint Babergh and Mid Suffolk Landscape Guidance' [online], available from: <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Joint-Landscape-Guidance-Aug-2015.pdf>

Suffolk Coast & Heaths AONB stretches over 40,537 hectares and is designated for its special heathlands, woodlands, estuaries and coast. As a result of recent boundary extensions<sup>46</sup>, the AONB extends into the Plan area in the south-west, encompassing Stutton Brook and the woodland surrounding it – Dodnash Wood, Holly Wood and Great Martin's Hill Wood (see **Figure AB.6**). The AONB Management Plan<sup>47</sup> identifies around 34% of the AONB has a wildlife designation, and around 4 million people visit the area yearly. 33 different objectives are identified for the management of the landscape, relating to the core themes of; landscape, coast and estuaries, land use and wildlife, enjoying the area, and working together.

**Figure AB.6: Suffolk Coast and Heaths AONB boundary revision 2020**



### National Character Areas

Bentley Parish is covered by National Character Area - **NCA 82 Suffolk Coast and Heaths**. The A12 / western boundary of the Parish also marks the boundary with the neighbouring NCA 86 South Suffolk and North Essex Clayland. Key features of the Suffolk Coast and Heaths include:

- Inland valleys containing small-scale historic patterns of irregular drained meadow enclosure, bounded by elm hedgerows.
- Settlement is sparse, with small isolated villages and farmsteads.
- A rich archaeology with numerous country house estates.
- Areas of older, mainly broadleaved plantation woodland, occurring within the estate and landscape parklands along the Stour and Orwell valley slopes as well as along the A12 corridor.
- Suffolk County Landscape Character Assessment

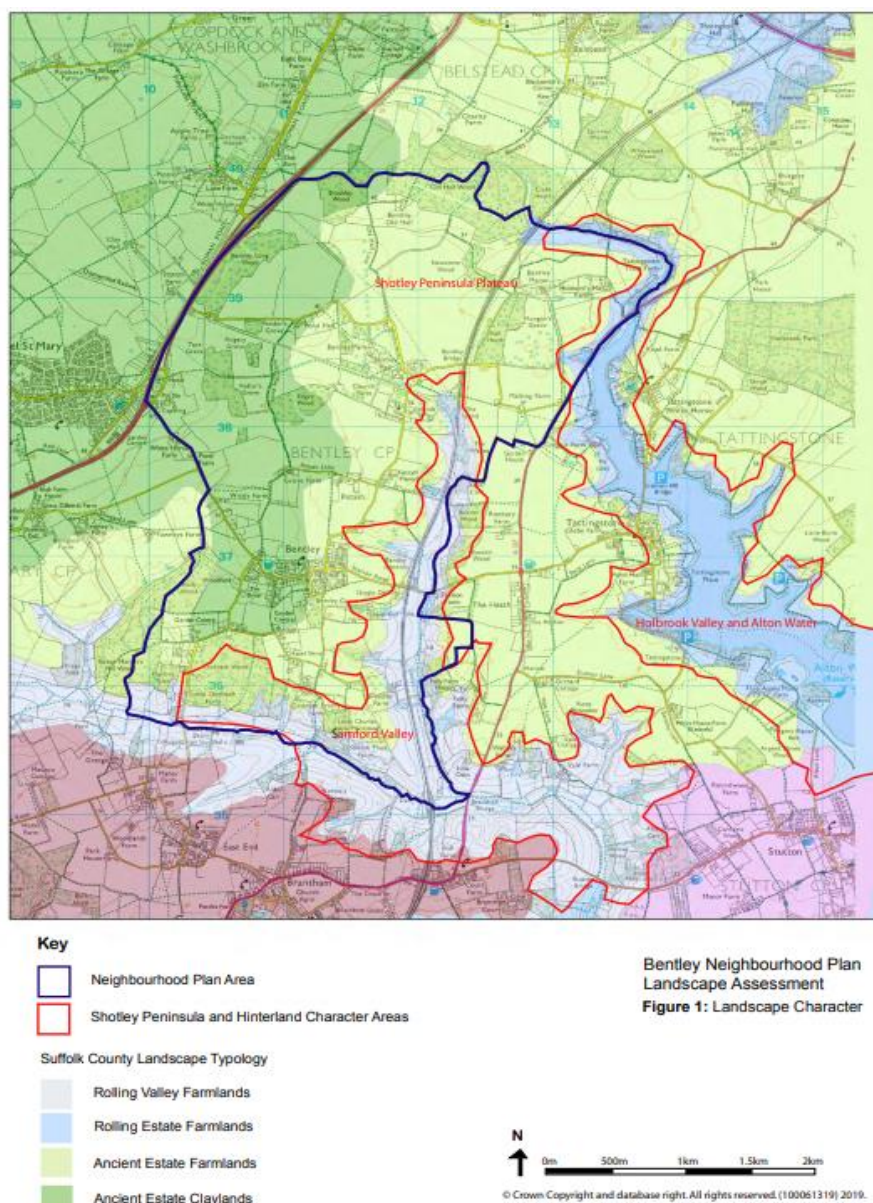
The landscape of Bentley Parish is divided into the following three main character types in the Suffolk County Landscape Character Assessment (SCLCA) (see **Figure AB.7**):

- **'Rolling Valley Farmlands'** (within the Samford Valley and its tributary);
- **'Ancient Estate Farmlands'** (forming the majority of the landscape above the incised valley slopes)
- **'Ancient Estate Claylands'** (which forms the marginally higher plateau landscape (above the c. 40m contour) in the west of the Parish);

'Rolling Estate Farmlands' also extend partially into the Plan area in the northeast, though this is away from the settlement area.

<sup>46</sup> DEFRA (2020) Extensions to the Suffolk Coast and Heaths AONB [online] available at: <https://www.gov.uk/government/publications/areas-of-outstanding-national-beauty-aonb-extensions-to-the-suffolk-coast-and-heaths-aonb>

<sup>47</sup> Suffolk Coast & Heaths AONB Advisory Committee and Partnership (2018) Suffolk Coast & Heaths Area of Outstanding Natural Beauty Management Plan 2018 – 2023 [online] available at: <https://www.suffolkcoastandheaths.org/wp-content/uploads/2020/03/2018-23-SCH-Management-Plan.pdf>

**Figure AB.7: Suffolk County Landscape Character Assessment; Bentley Parish**

### Former Special Landscape Area

A **Special Landscape Area (SLA)** is a local landscape designation identified in the 1980's, reflecting attractive combinations of landscape elements.

Most of the Parish was formerly designated as the Dodnash Special Landscape Area. Although the original assessment which led to these areas being designated is not available, the following types of landscape are known to be included:

- River valleys which still possess traditional grazing meadows with their hedgerows, dykes, and associated flora and fauna;
- Historic parklands and gardens; and
- Other areas of countryside where undulating topography and natural vegetation, particularly broadleaved woodland, combine to produce an area of special landscape quality and character.

## Bentley Neighbourhood Plan Landscape Appraisal (2019)

Alison Farmer Associates was appointed by Bentley Parish Council to undertake a landscape appraisal<sup>48</sup> of the Parish, in order to provide a robust evidence base to support the development of policy within the emerging Neighbourhood Plan. The appraisal builds on evidence discussed above and seeks to establish more detailed baseline data on settlement character and landscape context, in addition to assessing sensitivity and capacity of areas to accommodate change.

Consideration is given to identifying key landmarks and key views in and out of the settlement as well as gateways. The following landscape features have been identified as important elements contributing to local sense of place:

- Open space adjacent to the village pub
- Bentley Grove lime trees
- Small scale pastures south of the village hall and west of Grove Road
- Historic parkland associated with Bentley Hall
- Rural lanes

The appraisal has identified 10 key views throughout the Parish which are regarded as reflecting the special qualities of the Neighbourhood Plan area and which are highly valued by local residents. Further, the appraisal focusses on the immediate fringes of the settlement of Bentley and considers the sensitivity and capacity of the landscape fringing the settlement to accommodate development. The setting of the village has been divided into two areas for the purposes of assessment. These areas and their sensitivities, including capacity for development, are detailed below.

### Peripheral Area 1: Bentley North and Eastern Fringes

This peripheral area forms the northern and eastern edges of Bentley village and comprises medium scale arable fields as part of the plateau as well as the upper valley slopes to the Samford Valley tributary in the east. This landscape has a relatively open simple character and is predominately arable with woodland forming a treed skyline in the middle distance. Topography is gently sloping, increasing in gradient at the upper slopes of the valley. The subtle variations in topography and historic rural lanes are important in defining the setting to this part of the village.

The following factors increase the sensitivity of this landscape to development:

- Changing topography, as land dips into the river valley to the east;
- Historic character of the lanes;
- General lack of visibility of the village from the wider landscape;
- Linear form of the village; and
- Dispersed pattern of development in the wider area.

Overall this area has limited capacity for new housing development. Nevertheless, two areas are noted as having some capacity for new residential development:

- **Church Road:** Housing along Church Road which does not increase the width of the settlement or create a new abrupt, uniform, urban edge or reinforce cul-de-sac housing which is not characteristic. Care will need to be taken to retain the rural character of Church Road.
- **Capel Road:** Housing development to the rear of properties on Capel Road. This area may be suitable for community and/or retirement houses, but care would need to be taken to retain the rural and vegetated character of the settlement edge and public right of way to the east, due to its close proximity to key village facilities.

### Peripheral Area 2: Bentley Southern and Western Fringes

<sup>48</sup> Alison Farmer Associates (2019) Bentley Neighbourhood Plan Landscape Appraisal [online] available at: <https://bentleyneighbourhoodplan.files.wordpress.com/2020/09/landscape-final-report-dec-19.pdf>



This peripheral area forms the southern and western fringes of the settlement. This is transitional landscape between the relatively flat landscape of plateau farmland and the upper valley slopes of the Samford Valley (the latter being included within the recent extension to the Suffolk Coast and Heaths AONB). Small scale pasture enclosures occur close to the village edge with land uses including pasture, horticulture, orchards and some pony paddocks. There are also areas of larger scale arable fields often fringed with woodland on the upper valley slopes. Mature woodland and individual mature oak trees and hedgerows provide a strong sense of enclosure while some planting such as poplar shelterbelts and leylandii hedges appear out of place. Sections of dead elm hedgerows and bracken are noticeable towards the southern end of Grove Road.

The following factors increase the sensitivity of this landscape to development:

- Small scale enclosure pattern which forms a transition from built edge to wider arable landscape;
- Areas of open space which penetrate the village and reinforce sense of place and settlement form and provide a setting to historic buildings;
- Small scale nature of the rural lanes;
- Land within the setting of the proposed extension to the Suffolk Coast and Heaths AONB;
- Inter-visibility across the Samford Valley and increased visual sensitivity on open slopes; and
- Proximity to valued ancient woodland.

The landscape has some capacity for small infill development within existing housing plots where they are a reasonable size e.g. along **Grove Road**, although care would need to be taken to retain the rural character of the small pastures to the west.

Where there is a strong wooded backdrop there may also be scope for small scale development which is visually contained although care will be needed to provide a sufficient landscape buffer between new development and existing habitats and/or areas of landscape designation. Two areas are noted as having some capacity:

- The former garden centre area off **Bergholt Road**. Here there may be scope for low density housing or low-key employment in association with the enhancement of the landscape including the removal of non-native vegetation and urban boundary treatment. This site is not without constraint including the proximity and setting of the AONB (the recent extension to the AONB in particular), the sensitivity of the ancient woodland adjacent and the narrow, sinuous and rural character of the lane which accesses the site.
- Land south of **Capel Road** and northwest of **Bergholt Road**. This area whilst visually contained, is constrained by the setting of the AONB extension and nearby ancient woodland. However, the area may be able to accommodate limited development of a linear nature along the roads. There is scope to set development back from Capel Road to provide a new village open space/village gateway whilst maintaining views and vistas to the wider landscape when departing from the village. Care will need to be taken to retain views from the lanes towards wider farmland and woodland and any new housing should be seen with a wooded backdrop. Large scale housing development and cul-de-sac arrangements that undermine the historic character of the village should be avoided.

## Future baseline

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

However, locally distinctive landscape features, characteristics and special qualities can be protected, managed and enhanced through the Neighbourhood Plan. New development that is appropriately designed/ masterplanned, and landscape-led, has the potential to support the area's inherent landscape character and quality. This may, for example, include regeneration and brownfield

development that improves the village setting, delivering green infrastructure improvements and/ or new recreational opportunities and enhanced framing of key views.

## Key issues and opportunities

- The Parish lies predominantly within the setting of the Suffolk Coast and Heath AONB, with special qualities and values attributed with this landscape. Inappropriate development has the potential to erode the setting of the AONB and the rural nature of the Parish. Key sensitivities that could be affected by future development include river valleys and countryside which contribute to the overall rural feel of the area. Unique landscape features may require further safeguarding in development, including sparse farmstead settings and historic character areas.
- Important viewpoints have been identified in Bentley, which reflect the special qualities of the Neighbourhood Plan area and are highly valued by local residents. Development should seek to preserve these views and countryside visibility where possible.
- The Bentley Landscape Character Appraisal focusses on the immediate fringes of the settlement of Bentley and considers the sensitivity and capacity of the landscape here, providing key evidence and detail to underpin future growth strategies.

## Historic environment

### Context review

#### National

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

- Strategic policies should set out an overall strategy making provision for ‘conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.
- Planning policies and decisions should ensure that developments ‘are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).
- Heritage assets should be recognised as an ‘irreplaceable resource’ that should be conserved in a ‘manner appropriate to their significance’, taking account of ‘the wider social, cultural, economic and environmental benefits’ of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- Plans should set out a ‘positive strategy’ for the ‘conservation and enjoyment of the historic environment’, including those heritage assets that are most at risk.
- When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss of less than substantial harm to its significance.

These messages are supported by the national Planning Practice Guidance (PPG)<sup>49</sup> which itself includes the key message that local authorities should set out in their Local Plans a positive strategy for the conservation and enjoyment of the historic environment which recognises that conservation is not a passive exercise and that identifies specific opportunities for the conservation and enhancement of heritage assets.

The national design guide (2019)<sup>50</sup> sets out the characteristics of well-designed places and demonstrates what good design means in practice. It is based on national planning policy, practice guidance and objectives for good design as set out in the National Planning Policy Framework.

<sup>49</sup> Ministry of Housing, Communities and Local Government (2016), Planning Practice Guidance [online], available from: <https://www.gov.uk/government/collections/planning-practice-guidance>

<sup>50</sup> MHCLG (2019) National Design Guide [online] available at: <https://www.gov.uk/government/publications/national-design-guide>

Specific, detailed and measurable criteria for good design are most appropriately set out at the local level.

Along with the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes', Goal 6 'Enhanced beauty, heritage and engagement with the natural environment' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment'<sup>51</sup> directly relates to the Historic Environment.

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

Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 (February 2019)<sup>52</sup> outlines ways to manage change that conserves and enhances historic areas in order to positively contribute to sustainable development and provides information on the relationship with local and neighbourhood plans and policies. Principally, the advice note emphasises the importance of:

- Understanding the different types of special architectural and historic interest which underpin the designations; and
- Recognising the value of implementing controls through the appraisal and/or management plan which positively contribute to the significance and value of Conservation Areas.
- Clearly identifying those issues that threaten the area's character or appearance and that merit the introduction of management measures.

Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA): Historic England Advice Note 8 (December 2016)<sup>53</sup> provides support to all stakeholders involved in assessing the effects of certain plans and programmes on the historic environment. It offers advice on heritage considerations during each stage of the SA/SEA process and helps to establish the basis for robust and comprehensive assessments.

Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2<sup>nd</sup> Edition) (December 2017)<sup>54</sup> provides general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views can contribute to setting. Specifically, Part 2 of the advice note outlines a five stepped approach to conducting a broad assessment of setting:

- Step 1: Identify which heritage assets and their settings are affected;
- Step 2: Assess the degree to which these settings contribute to the significance of the heritage asset(s) or allow significance to be appreciated;
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
- Step 4: Explore ways to maximise enhancement and avoid or minimise harm; and
- Step 5: Make and document the decision and monitor outcomes.

Neighbourhood Planning and the Historic Environment: Historic England Advice Note 11 (October 2018)<sup>55</sup> outlines the importance of considering the historic environment whilst preparing the plan

<sup>51</sup> HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online]

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

<sup>52</sup> Historic England (2019): 'Conservation Area Designation, Appraisal and Management: Advice Note 1' [online] available from: <https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/>

<sup>53</sup> Historic England (2016): 'SA and SEA: Advice Note 8' [online] available at: <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

<sup>54</sup> Historic England (2017): 'Setting of Heritage Assets: 2<sup>nd</sup> Edition' [online] available at: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

<sup>55</sup> Historic England (2018): 'Neighbourhood Planning and the Historic Environment' [online] available at: <https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/>

(section 1), which culminates in a checklist of relevant issues to consider, followed by an overview of what this means in terms of evidence gathering (section 2). Sections 3 to 5 of the advice note focus on how to translate evidence into policy, understand the SEA process and Historic England's role in neighbourhood planning.

## Local

A number of policies within the Babergh Local Plan Core Strategy indirectly relate to the historic environment theme, including:

- CS2 Settlement Pattern Policy; and
- CS14 Green Infrastructure

Further, the emerging Joint Local Plan provides Policy LP21 (The Historic Environment) which directly relates to this theme.

## Baseline review

### Current baseline

#### Early Origins and Evolution of the Parish

The Domesday Book records 7 households with one mill and one church within Bentley Parish. By the time of the 1st Edition OS in the late 1800's the settlement across the Parish comprised a dispersed pattern with clusters of dwellings at junctions (such as at the Case Is Altered Public House or Bentley Station) or manor houses (such as Bentley Grove or Bentley Hall and Park). The latter was associated with the Parish Church and an area of parkland landscape and carried the place name Bentley. It was not until the 1960s and 1970s that development focused along Capel and Station Roads in the southern half of the Parish. This development, including the introduction of small-scale housing estates accessed off the main road, has over time filled in the gaps between dwelling clusters. The result was the creation of a more nucleated settlement which then took the name Bentley Village. The isolated location of the present-day Parish Church and Primary School is a reminder of the more dispersed origins of settlement pattern in the Parish. This pattern is also reflected in the relatively dense network of narrow rural lanes which connected dwellings and farms, and the polyfocal nature of the village which has no historic core.<sup>56</sup>

### Designated heritage assets

Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent. In terms of designated heritage assets within the Plan area, there are five Grade II\* listed buildings and nine Grade II listed buildings:

- Meeting Hall (Grade II\*)
- Stables, Bentley Hall, Approximately 30 Metres South Of Bentley Hall (Grade II)
- Hubbard's Hall (Grade II)
- Little Dodnash Farmhouse (Grade II)
- Maltings Farmhouse (Grade II)
- Maltings House (Grade II)
- Bentley Grove (Grade II)
- Church Of St Mary (Grade II\*)
- Old Hall (Grade II\*)
- Maltings Cottage (Grade II)
- Pump In Front Of And Approximately 7 Metres East Of Maltings House (Grade II)

<sup>56</sup> AFA (2019): 'Landscape Character Appraisal' [online] available at: <https://bentleyneighbourhoodplan.files.wordpress.com/2020/09/landscape-final-report-dec-19.pdf>

- Bentley Hall (Grade II\*)
- Barn On Opposite Side Of Road And Approximately 100 Metres North East Of Bentley Hall (Grade II\*)
- Pond Hall (Grade II)
- Bentley War Memorial (Grade II)

Also, on the south side of Dodnash Wood is the site of the Dodnash Priory, a designated Scheduled Monument. The scheduled area comprises “*a large pond, probably remains of fishponds, a fragment of flint wall on its side and an area of lumps and bumps extending over parts of two fields*”.<sup>57</sup> The flint wall is identified locally as falling, unmaintained and at risk, particularly from vandalism, from which it requires enhanced protection.

### Heritage at risk

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I and Grade II\* listed buildings, scheduled monuments, historic parks and gardens, registered battlefields, wreck sites and conservation areas deemed to be ‘at risk’. As of November 2019, there is one building within the Plan area that is identified to be ‘at risk’: **Barn north east of Bentley Hall, Bentley Hall Road**, a barn built C15, timber-framed and brick nogging. It is redundant and is only suitable for a very low-key use. It is structurally unstable and water is penetrating the walls in places, accelerating decay of its structure. Historic England and the Local Authority are involved in on-going discussions with the owner to secure the conservation of the barn.

### Local designations

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

The Suffolk Historic Environment Record (HER)<sup>58</sup> identifies 74 monument records which lie either wholly or partially within the Plan area. These largely comprise of; farmsteads, railway stations, used and disused railway lines, a medieval deer park, Mesolithic, Neolithic, Bronze-Age, Roman and Anglo Saxon findspots, ancient woodland, and cropmarks.

### Future baseline

Viewpoints in Bentley are potentially susceptible to insensitive design and layout from the development of new housing, employment and infrastructure which may affect historic landscapes and historic landscape features. Designated and undesignated heritage assets within the Plan area have the potential to receive notable harm from development due to insensitive design, layout or massing.

However, there is also the potential for future development to provide beneficial enhancement of heritage assets or their settings within the Plan area, particularly through public realm and access improvements or opportunities to better reveal the significance of an asset.

## Key issues and opportunities

There are 14 listed buildings within the Neighbourhood Plan area, five of which are Grade II\* listed. Development within the plan area requires the preservation and maintenance of these assets and their settings, subject to detailed matters of design and layout.

There is a designated heritage asset ‘at risk’ within the Plan area which should not be made susceptible to further harm in future development. Further, any opportunities to support the restoration of this asset should be encouraged.

<sup>57</sup> Suffolk County Council (2020) Suffolk Heritage Explorer [online] available at: <https://heritage.suffolk.gov.uk/map>

<sup>58</sup> Ibid.

Assets acknowledged for their local heritage value could benefit from additional policy protections and provisions within the Bentley Neighbourhood Plan.

## Land, soil and water resources

### Context review

#### National

Key messages from the National Planning Policy Framework<sup>59</sup> (NPPF) include:

- Planning policies and decisions should contribute to and enhance the natural and local environment by:
  - Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils.
  - Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.
  - Prevent new or existing development from being ‘adversely affected’ by the presence of ‘unacceptable levels’ of soil pollution or land instability and be willing to remediate and mitigate ‘despoiled, degraded, derelict, contaminated and unstable land, where appropriate’.
- Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or ‘brownfield’ land.
- Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.
- Planning policies and decisions should ‘give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs’, and ‘promote and support the development of under-utilised land and buildings.’
- Taking a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.
- Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.
- Ensure that, wherever possible, development helps to improve local environmental conditions including water quality, taking into account relevant information such as river basin management plans.

Since July 2017 the Government’s Planning Practice Guidance (PPG) requires Local Planning Authorities to publish a Brownfield Land Register, and review it at least once a year, in order to identify all previously developed sites with potential for delivering new development. This is to help achieve maximum planning value and efficiency from available land, whilst avoiding unnecessary land take at greenfield sites.<sup>60</sup> Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.<sup>61</sup>

<sup>59</sup> MHCLG (2019) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>60</sup> MHCLG (2017) Guidance: Brownfield Land Registers [online] available at: <https://www.gov.uk/guidance/brownfield-land-registers>

<sup>61</sup> Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

The Government's 25 Year Environment Plan was published in 2018 and presents the 'goals for improving the environment within a generation and leaving it in a better state than we found it'.<sup>62</sup> The implementation of this plan aims to achieve clean air, clean and plentiful water, reduced risk from environmental hazards, and managed exposure to chemicals. Specific policies and actions relating to environmental quality include:

- Improving soil health and restoring and protecting our peatlands;
- Respecting nature in how we use water;
- Reducing pollution; and
- Maximising resource efficiency and minimising environmental impacts at end of life.

Safeguarding our Soils: A strategy for England<sup>63</sup> sets out a vision for soil use in England which includes better protection for agricultural soils, protecting stores of soil carbon, improving the resilience of soils to climate change and preventing soil pollution. The essential message in relation to development is that pressure on soils is likely to increase in line with development pressure and the planning system should seek to mitigate this.

The Water Framework Directive<sup>64</sup> (2000) requires a management plan to be prepared for water catchment areas to inform planning and help meet objectives and obligations in areas such as water efficiency and sustainable drainage.

The Water White Paper 2011<sup>65</sup> sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

The Government's Water Strategy for England<sup>66</sup> (2008) provides strategy for the water sector up until 2030, which aims to sustainably deliver secure water supplies and an improved and protected water environment. It sets out actions within the following areas:

- Water demand;
- Water supply;
- Water quality;
- Surface water drainage;
- River and coastal flooding;
- Greenhouse gas emissions;
- Charging for water; and
- Regulatory framework, competition and innovation.

Water for life<sup>67</sup> (2011) sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

The National Waste Management Plan<sup>68</sup> provides an analysis of the current waste management situation in England and evaluates how it will support the implementation of the objectives and provisions of the revised Waste Framework Directive<sup>69</sup>. This includes an assessment of the need for

<sup>62</sup> DEFRA (2018) 25 Year Environment Plan [online] available at: <https://www.gov.uk/government/publications/25-year-environment-plan>

<sup>63</sup> DEFRA (2009) Safeguarding our Soils: A strategy for England [online] available at: <https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>

<sup>64</sup> Directive 2000/60/EC of the European Parliament and of the Council establishing a framework for the Community action in the field of water policy.

<sup>65</sup> Defra (2011) Water for life (The Water White Paper) [online] available at: <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>

<sup>66</sup> Defra (2011) Future Water: the Government's Water Strategy for England [online] available at: <https://www.gov.uk/government/publications/future-water-the-government-s-water-strategy-for-england>

<sup>67</sup> Defra (2011) Water for life [online] available at: <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>

<sup>68</sup> DEFRA (2013) Waste Management Plan for England [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/265810/pb14100-waste-management-plan-20131213.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf)

<sup>69</sup> Directive 2008/98/EC

new collection schemes, additional waste infrastructure and investment channels, as well as providing general or strategic waste management policies.

The EU Nitrates Directive (91/676/EEC) requires member states to identify areas where groundwater has nitrate concentrations of more than 50 mg/l nitrate or is thought to be at risk of nitrate contamination. These areas are designated as Nitrate Vulnerable Zones (NVZs) and as such are recognised as being at risk from agricultural nitrate pollution. Member states are required to establish Action Programmes in order to reduce and prevent further nitrate contamination.

## Local

The Babergh Water Cycle Study (2011)<sup>70</sup> considers the following issues, addressing the constraints that they may pose to future development and, where applicable, discusses the improvements necessary to achieve the required level of development throughout the planning period, until 2031:

- Water Resources and Supply;
- Wastewater Collection and Treatment;
- Water Quality and Environmental Issues;
- Flood Risk; and
- Demand Management and Sustainable Drainage Systems.

The Anglian Water Services (AWS) Water Resource Management Plan (WRMP) (2019)<sup>71</sup> is a technical document written primarily for regulators, as well as other technical stakeholders, following principles set out in the Water Resources Planning Guideline. The 2019 WRMP:

- Promotes the efficient and effective use of available resources, through an ambitious, customer supported and cost-beneficial demand management programme that includes including reducing leakage by 22% by 2025 and 42% by 2045, with average per capita consumption falling to 120 l/h/d by 2045.
- Improves the resilience of public water supplies by adapting to climate change from 2020 and moving to a higher level of service for all customers by 2025. The reduced risk of severe restrictions is cost beneficial and supported by customers.
- Supports the delivery of a wider resilience strategy to reduce the population served by a single supply to 14% by 2025, with a long term ambition to reach zero by 2035.
- Enhances the environment by reducing abstraction in sensitive areas, including the capping of time-limited abstraction licences by 2022.
- Is supported by customers, who have been consulted extensively.
- Reflects feedback from consultation, including early adaptation to climate change, improving drought resilience, planning for growth, and the need to develop a plan that represents 'best-value' over the long-term.
- Fully considers every potential water resource option, including third party options and intercompany transfers.

A number of policies within the Babergh Local Plan Core Strategy indirectly relate to the land, soil and water resources theme, including:

- CS2 Settlement Pattern Policy;
- CS3 Strategy for Growth and Development;
- CS12 Sustainable Design and Construction Standards; and
- CS21 Infrastructure Provision.

<sup>70</sup> Babergh District Council (2011) The Babergh Water Cycle Study [online] available at: <https://www.babergh.gov.uk/assets/Strategic-Planning/Babergh-Core-Strategy/CoreStrategyCoreDocList/BDCWaterCycleStudyFinalv2Report.pdf>

<sup>71</sup> Anglian Water (2019) Water Resource Management Plan 2019 [online] available at: <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf>



Further, the emerging Joint Local Plan provides Policy LP17 (Environmental Protection) which directly relates to this theme.

## Baseline review

### Current baseline

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

In this regard, the majority of the Bentley settlement is underlain by very good quality land (Grade 2). The remaining part of the Plan area is underlain by Grade 3 land (good to moderate), with the exception of some small areas of non-agricultural land.

Additionally, based on the results of the 'Predictive BMV Land Assessment', the majority of the Bentley settlement has a greater than 60% likelihood of containing BMV land, whilst the surrounding areas contain a 'moderate' likelihood of containing BMV land (20 – 60%).

The early origins of settlement within the Parish have been influenced by the underlying geology and drainage system. Most of the Parish has an underlying geology of Red Crag Formation giving rise to light sandy, free draining soils. The tributary valleys to the south eastern and southern boundaries of the Parish consist of the heavier soils of London Clay (AFA, 2019) .

The primary watercourse within the Parish is the Samford stream which flows through an east-west steep sided valley and forms the southern boundary of the Parish. Flowing in from the north is a notable northern-south orientated tributary which creates the eastern edge of the Parish. At the north eastern corner of the Parish is a further stream which feeds into Alton Water. Beyond the valleys the Parish comprises an elevated farmed plateau which is gently undulating (AFA, 2019) .

### Mineral resources

The Suffolk Minerals and Waste Local Plan (SMWLP)<sup>72</sup> identifies that besides indigenous land-won sand and gravel, the supply of aggregates to Suffolk is made up from sand and gravel imported from surrounding counties, imported crushed rock, marine dredged sand and gravel, and indigenous and imported recycled construction, demolition and excavation waste. The SMWLP allocates nine sites for the extraction of sand and gravel; one of which lies east of the Plan area at Tattingstone. Further, the entire Plan area lies within a Minerals Consultation Area.

### Water resources

Babergh District is served by one water company, Anglian Water Services (AWS). The Environment Agency have published a document entitled 'Areas of Water Stress: final classification' which included a map of England, identifying areas of relative water stress. The whole of AWS' supply area is shown as an area of 'Serious' water stress, based upon the amount of water available per person both now and in the future.<sup>73</sup>

Within their Water Resource Management Plans (WRMPs) water companies refer to their Water Resource Zones (WRZs). A WRZ is the largest possible zone in which all resources, including external transfers, can be shared and hence the zone in which all customers experience the same risk of supply failure from a resource failure.<sup>74</sup> Babergh District is served by the East Suffolk WRZ.<sup>75</sup> Demand is predicted to increase in the East Suffolk WRZ by 5-10% between 2017 to 2045.

<sup>72</sup> Suffolk County Council (2020) Suffolk Minerals and Waste Local Plan [online] available at: <https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/suffolk-minerals-and-waste-development-scheme/>

<sup>73</sup> Environment Agency (date unknown) Areas of water stress: final classification [online] available at: <https://www.iow.gov.uk/azservices/documents/2782-FE1-Areas-of-Water-Stress.pdf>

<sup>74</sup> Babergh District Council (2011) Babergh Water Cycle Study [online] available at: <https://www.babergh.gov.uk/assets/Strategic-Planning/Babergh-CoreStrategy/CoreStrategyCoreDocList/BDCWaterCycleStudyFinalv2Report.pdf>

<sup>75</sup> Anglian Water (2019) Water Resource Management Plan 2019 [online] available at: <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf>

## Future baseline

Future development has the potential to affect water quality through increased consumption, diffuse pollution, waste-water discharges, water run-off, and modification. It is considered that AWS will seek to address any water supply and wastewater management issues over the plan period in line with the WRMP 2019; and the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality within the Plan area and wider area. However, it will be important for new development to avoid impacts on water quality and to contribute to reducing consumption and improving efficiency.

The majority of the Neighbourhood Plan area has potential to be BMV agricultural land, including areas of Grade 2 land. Future development within the Neighbourhood Plan area could therefore lead to the loss of high-quality soil resources.

## Key issues and opportunities

A significant proportion of the Neighbourhood Plan area is underlain by land classified as the best and most versatile (BMV) agricultural land. Future development should seek to avoid loss of BMV land wherever possible.

The WRMP states that even with the proposed demand management strategy, the Essex Suffolk WRZ will be in a resource deficit by 2044-2055.<sup>76</sup> The WRMP has outlined measures required to address predicted shortfalls and investment priorities over the Plan period, and development in the Plan area should not undermine these measures.

# Population and communities

## Context review

### National

Key messages from the National Planning Policy Framework<sup>77</sup> (NPPF) include that planning policies should:

- Provide the social, recreational and cultural facilities and services the community needs, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship, whilst guarding against the unnecessary loss of community facilities and services.
- Retain and develop accessible local services and community facilities in rural areas.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high-quality public spaces, which encourage the active and continual use of public areas.
- Enable and support healthy lifestyles through provision of green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
- Ensure that there is a 'sufficient choice of school places' and taking a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.

<sup>76</sup> Anglian Water (2019) Water Resource Management Plan 2019 [online] available at: <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf>

<sup>77</sup> MHCLG (2019) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

National Planning Practice Guidance (NPPG)<sup>78</sup> identifies that:

- Local Planning Authorities should assess their development needs working with the other local authorities in the relevant housing market area or functional economic market area in line with the duty to cooperate. This is because such needs are rarely constrained precisely by local authority administrative boundaries.
- Local planning authorities should secure design quality through the policies adopted in their local plans. Good design is indivisible from good planning and should be at the heart of the plan making process.
- A healthy community is a good place to grow up and grow old in. It is one which supports healthy behaviors and supports reductions in health inequalities. It should enhance the physical and mental health of the community.
- Green infrastructure is a network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. Local Plans should identify the strategic location of existing and proposed green infrastructure networks. Where appropriate, supplementary planning documents can set out how the planning, design and management components of the green infrastructure strategy for the area will be delivered.

The Select Committee on Public Service and Demographic Change report *Ready for Ageing?* (2013)<sup>79</sup> warns that society is underprepared for the ageing population. The report says that “*longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises*”. The report says that the housing market is delivering much less specialist housing for older people than is needed. Central and local government, housing associations and house builders need urgently to plan how to ensure that the housing needs of the older population are better addressed and to give as much priority to promoting an adequate market and social housing for older people as is given to housing for younger people.

## Local

The Babergh & Mid Suffolk District Councils Joint Homelessness Reduction and Rough Sleeping Strategy Homelessness Strategy 2019-2024 sets out the homelessness strategy in the area<sup>80</sup>. The strategy presents six key priorities with associated actions to enable the delivery of the Councils’ shared vision for the service over the next five years.

The Babergh & Mid Suffolk District Councils Communities Strategy 2019-2036 sets out the goal of developing “resilient and connected” communities. The strategy guides interventions for building closer relationships across a wide range of communities.

A number of policies within the Babergh Local Plan Core Strategy directly relate to the population and communities theme, including:

- CS2: Settlement Pattern Policy;
- CS3: Strategy for Growth and Development;
- CS18: Mix and Types of Dwellings;
- CS19: Affordable Homes; and
- CS21: Infrastructure Provision.

Further, the emerging Joint Local Plan provides strategic and local plan policies which directly relate to this theme, including, but not limited to; SP01 - SP04, SP08, and LP01 – LP11.

<sup>78</sup> Department for Communities and Local Government (2012) National Planning Practice Guidance <sup>[online]</sup> available at: <http://planningguidance.communities.gov.uk/>

<sup>79</sup> Select Committee on Public Service and Demographic Change (2013) *Ready for Ageing?* [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/>

<sup>80</sup> Babergh & Mid Suffolk District Councils Joint Homelessness Reduction and Rough Sleeping Strategy 2019-2024 <https://www.babergh.gov.uk/assets/Housing-and-Homelessness/Housing-Strategy/HRRSS-2019-2024-Final.pdf>

## Baseline review

### Current baseline

As shown in **Table AB.2** (below), population estimates for Bentley parish indicate that the population of the area increased by 2.2% between 2011 and 2019 (mid-year estimate). This is lower in comparison to estimates for the District (4.9%), the East of England (6.6%) and England as a whole (6.1%).

**Table AB.2: Population estimates (2011- 2019)**

Date	Bentley	Babergh	East of England	England
<b>2011</b>	776	87,740	5,846,965	53,012,456
<b>2019 mid-year estimate</b>	793	92,036	6,236,072	56,286,961
<b>Population Change between 2011- 2019 mid estimate</b>	+2.2%	+4.9%	+6.6%	+6.1%

Census data (2011) presented in **Table AB.3** (below), shows that the 60+ age category is the largest age group in the Plan area. This trend is also seen in Babergh, the East of England and England as a whole. However, the proportion of residents within this older age category is more pronounced than comparative figures for the District, the East of England and England as a whole.

**Table AB.3: Age structure**

	Bentley	Babergh	East of England	England
<b>0-15</b>	15.9%	18.1%	18.9%	18.9%
<b>16-24</b>	5.3%	9.1%	10.9%	11.9%
<b>25-44</b>	18.3%	22.4%	26.5%	27.5%
<b>45-59</b>	21.5%	21.1%	19.8%	19.4%
<b>60+</b>	39.1%	29.3%	23.8%	22.3%
<b>Total Population</b>	776	87,740	5,846,965	53,012,456

### Household deprivation

Census statistics measure deprivation across four 'dimensions' of deprivation, summarized below:

- **Employment:** Any person in the household (not a full-time student) that is either unemployed or long-term sick.
- **Education:** No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
- **Health and Disability:** Any person in the household that has generally 'bad' or 'very bad' health or has a long term health problem.
- **Housing:** The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.

**Table AB.4: Relative household deprivation**

	<b>Bentley</b>	<b>Babergh</b>	<b>East of England</b>	<b>England</b>
<b>Household not deprived</b>	49.7%	47.5%	44.7%	42.5%
<b>Deprived in 1 dimension</b>	32.8%	33.2%	32.9%	32.7%
<b>Deprived in 2 dimensions</b>	15.9%	16.5%	17.9%	19.1%
<b>Deprived in 3 dimensions</b>	1.5%	2.7%	3.9%	5.1%
<b>Deprived in 4 dimensions</b>	0.0%	0.2%	0.4%	0.5%

A large proportion of households are not deprived in any area; a higher proportion than comparative figures for Babergh, the East of England and England.

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

- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).
- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- **Education, Skills and Training:** The lack of attainment and skills in the local population.
- **Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
- **Crime:** The risk of personal and material victimisation at local level.
- **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
  - ‘Geographical Barriers’: relating to the physical proximity of local services
  - ‘Wider Barriers’: relating to access to housing, such as affordability.
- **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
  - a) ‘Indoors Living Environment’ measures the quality of housing.
  - b) ‘Outdoors Living Environment’ measures air quality and road traffic accidents.
    - Two supplementary indices (subsets of the Income deprivation domains), are also included:
      - a) Income Deprivation Affecting Children Index: The proportion of all children aged 0 to 15 living in income deprived families.
      - b) Income Deprivation Affecting Older People Index: The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs)<sup>81</sup> are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as

<sup>81</sup> DCLG (2019): Indices of Deprivation Explorer’, [online] available at: [https://dclgapps.communities.gov.uk/imd/iod\\_index.html](https://dclgapps.communities.gov.uk/imd/iod_index.html)

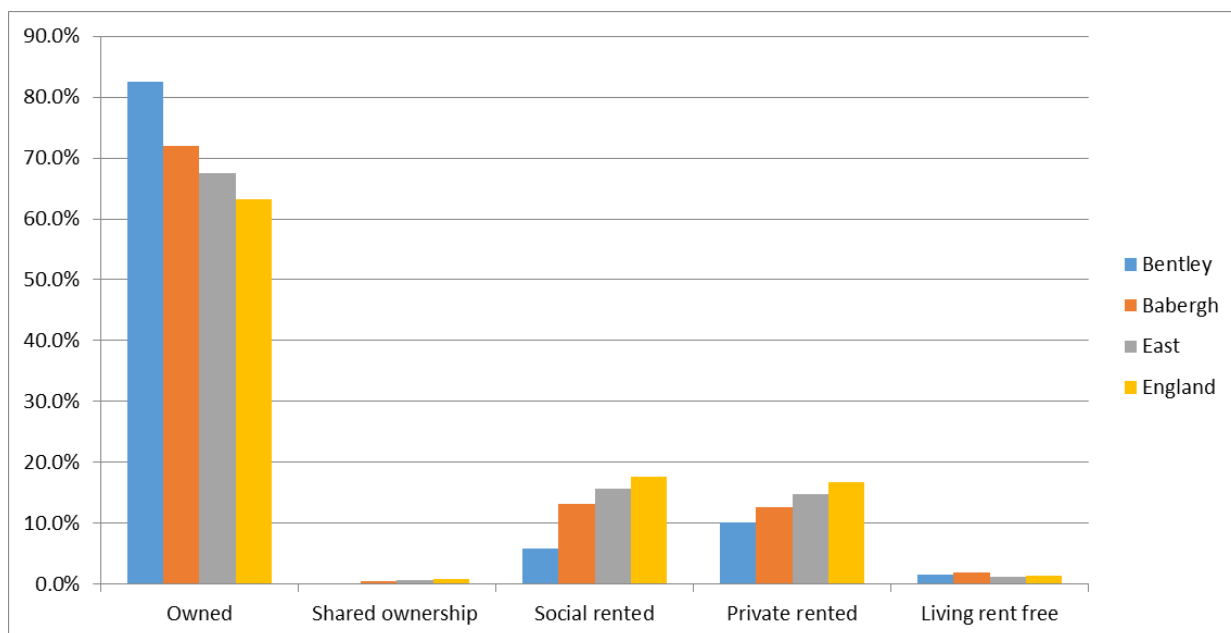
consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2019, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales.

In this regard, Bentley sits within the Babergh 010D LSOA, which is one of the 20% least deprived neighbourhoods in the country.

## Housing tenure

As shown in **Figure AB.8** the majority of residents in the Plan area own their own homes (82.5%), greater than comparative figures for Babergh (71.9%), the East (67.6%) and England as a whole (63.3%). In comparison, a low proportion of residents rent accommodation privately or socially (15.9%), lower than figures for the District (25.6%), the Region (30.4%) and England (34.5%).

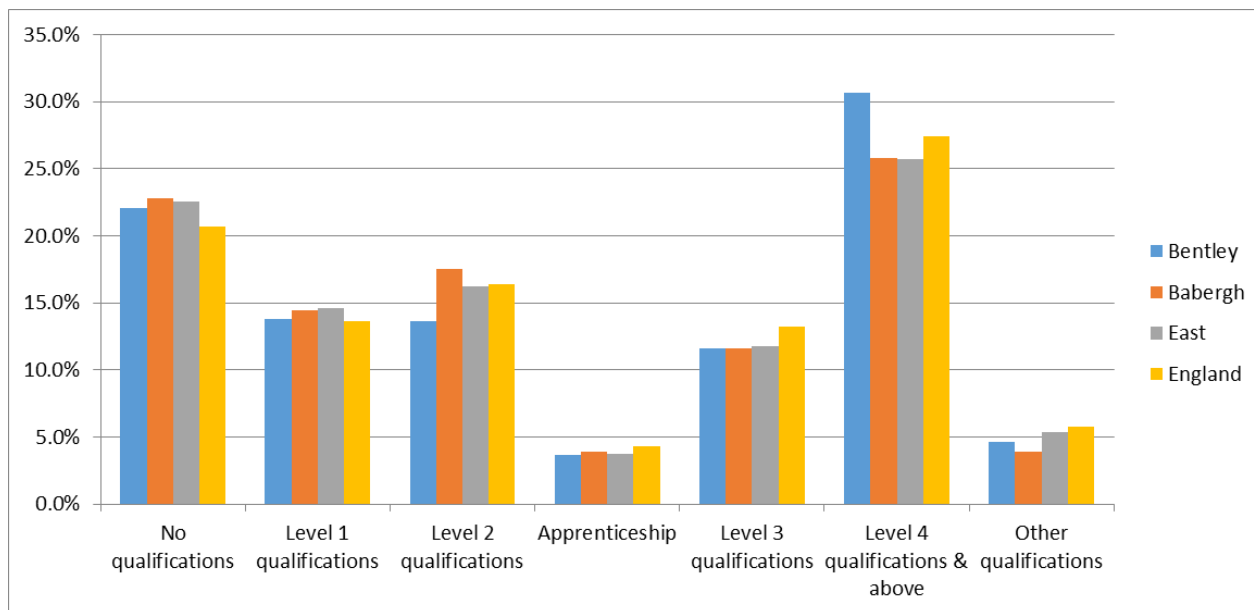
**Figure AB.8: Housing tenure for Bentley**



## Level of qualification

**Figure AB.9** overleaf shows the highest level of qualifications for residents in the Plan area. In this regard, a large proportion of residents in Bentley have at least a Level 4 qualification or above (30.6%). In comparison, 25.8% of residents in Babergh, 25.7% of residents in the East, and 27.4% of residents in England have Level 4 qualifications and above.

**Figure AB.9: Highest level of qualification**

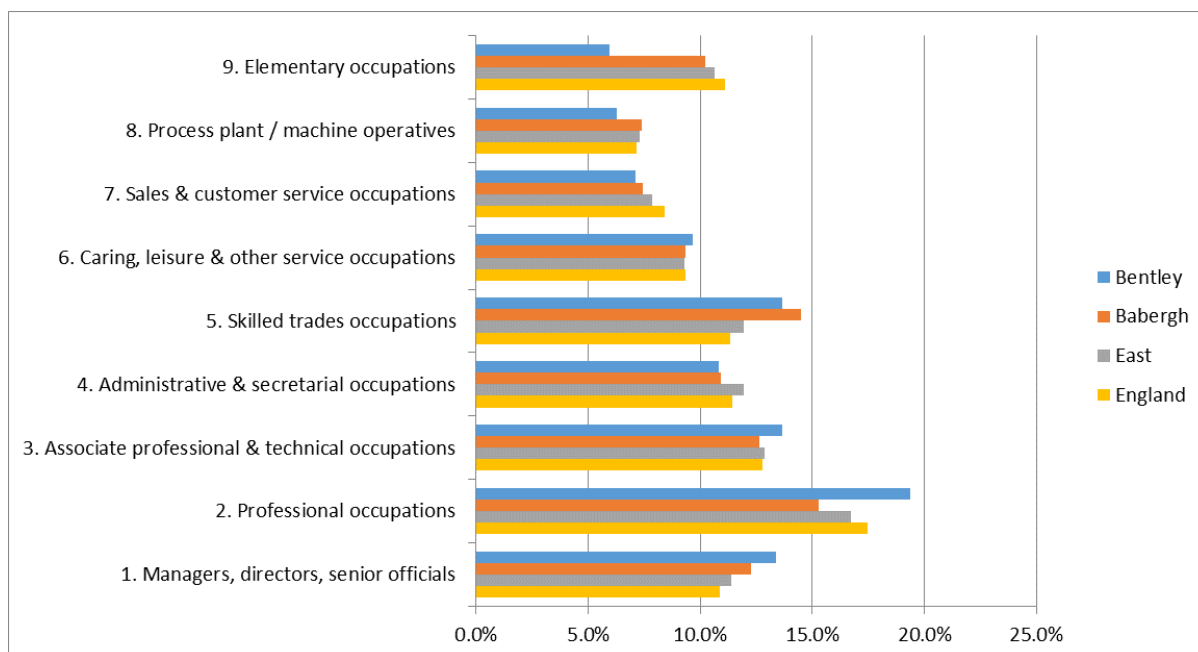


## Employment

Regarding employment within the Neighbourhood Plan area **Figure AB.10** below shows, the following three occupational categories support the most residents:

- Professional occupations (19.4%)
- Skilled trades occupations (13.7%)
- Associate professional & technical occupations (13.7%)

**Figure AB.10: Occupation of usual residents**



## Community services

Bentley Parish Council describes the Plan area as: ‘a thriving community with many social events taking place from Aerobics to Open Mic Nights to our own Firework Display. Regular events take place in the Village Hall, at our Community Pub, ‘The Case is Altered’ or on our Village Playing Field’.

The settlement of the Parish is localised to the lower half of the Plan area, and contains the majority of the community services, including local pubs, Bentley Primary School, the Reformed Baptist Church, Bentley Riding School and Briar Campsite.

### Future baseline

The population will continue to grow, although it is recognised that current trends indicate this will be a slower rate than that of district, regional and national comparators.

The suitability (e.g. size and design) and affordability of housing to meet local needs will depend on the implementation of appropriate housing policies through the Local Plan and Neighbourhood Plan. Unplanned development may have wider implications in terms of delivering the right mix of housing types, tenures and sizes in suitably connected places.

Increases in vehicle congestion brought about by development has the potential to put strain on the existing access issues discussed within **Chapter 10**. As the population of the Plan area continues to increase and age, this could potentially negatively impact upon the future vitality of the local community and economy of certain parts of the Plan area, whilst also placing additional pressures on existing services and facilities either within the Parish or in the surrounding areas.

However, new development could also enhance access to the local employment offer and enable increased levels of working from home within the Plan area, depending on the exact location, design and layout of development. Consideration should also be given to access to schools and local services/ facilities in this respect, recognising the importance of connectivity to support sustainable growth.

## Key issues and opportunities

The population of Bentley increased by 2.2% between the period of 2011 and 2019 (based on mid-year estimates). Population growth was lower in the Parish over the period of 2001- 2011 than comparative figures for Babergh, the East of England as a whole. Additionally, a large proportion of residents in the Plan area are aged 60 or over (39.1%). Development should acknowledge the specialist needs of an ageing population with regards to their accessibility to key community services, such as recreational areas and shops.

Levels of deprivation within the Plan area are low. Additionally, a high proportion of residents have level 4 qualifications and above (30.6%). As the population of Bentley continues to grow, it is important that development continues to support low levels of deprivation by targeting more isolated areas that can be linked to employment and other key services located in the south of the Plan area.

## Health and wellbeing

### Context review

#### National

Key messages from the National Planning Policy Framework<sup>82</sup> (NPPF) include that planning policies should:

- Enable and support healthy lifestyles through provision of green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
- Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.

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<sup>82</sup> MHCLG (2019) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)



- Help deliver access to high quality open spaces and opportunities for sport and physical activity to contribute to the health and well-being of communities.

National Planning Practice Guidance (NPPG)<sup>83</sup> identifies that local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making.

The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

The Fair Society, Healthy Lives ('The Marmot Review')<sup>84</sup> investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is: *“overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities”*.

Health Equity in England: The Marmot Review 10 Years On (2020) has been produced by the Institute of Health Equity and commissioned by the Health Foundation to mark 10 years on from the landmark study Fair Society, Healthy Lives (The Marmot Review).<sup>85</sup> The report highlights that:

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

## Local

The Joint Strategic Plan Refresh 2016-2020<sup>86</sup> provides an assessment of the current and future health and wellbeing needs of the people of Babergh and Mid Suffolk until 2020.

A number of policies within the Babergh Local Plan Core Strategy indirectly relate to the health and wellbeing theme, including:

- CS2 Settlement Pattern Policy;
- CS3 Strategy for Growth and Development;
- CS14 Green Infrastructure; and
- CS21 Infrastructure Provision.

Further, the emerging Joint Local Plan provides Policies SP08 – SP10, LP17, LP25, LP26, LP30 – LP35 which directly relate to this theme.

## Baseline review

### Current baseline

#### Health indicators

<sup>83</sup> Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

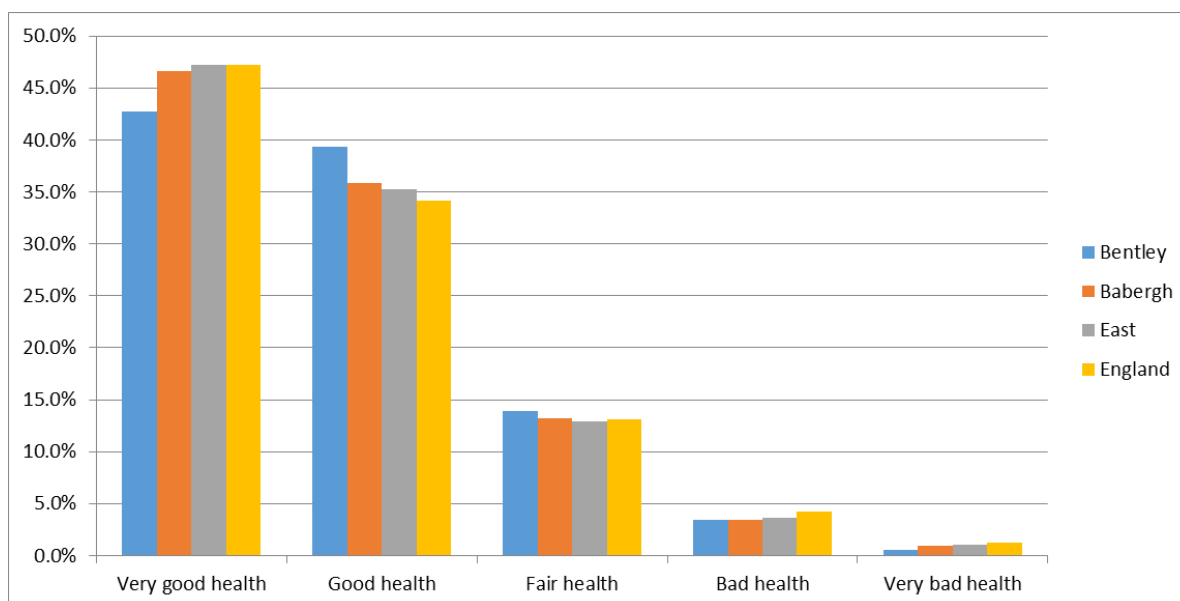
<sup>84</sup> The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available at: <http://www.nice.org.uk/nicemedia/live/12111/53895/53895.pdf>

<sup>85</sup> Health Equity in England: The Marmot Review 10 Years on (2020) <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

<sup>86</sup> Joint Strategic Plan Refresh 2016-2020 available at: <https://www.babergh.gov.uk/assets/The-Council/Performance/Joint-Strategic-Plan-2016-2020.pdf>

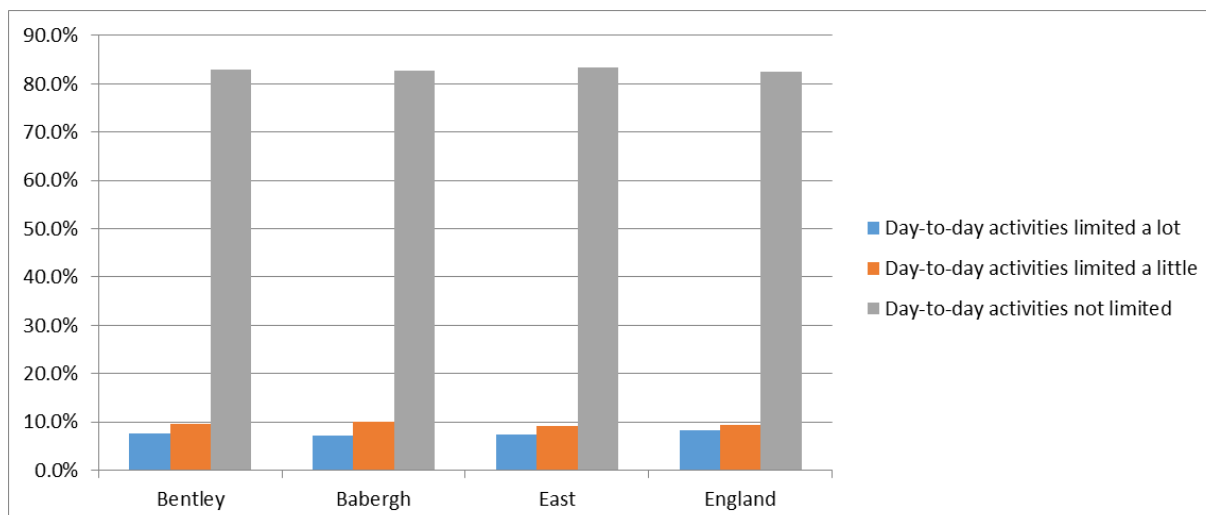
**Figure AB.11** shows that general health in the Plan area is 'good' or 'very good' (82.1%), in line with District-level and Regional figures (82.4% and 82.5% respectively), and higher than averages for England as a whole (81.4%).

**Figure AB.11: General health**



11.7 Census data presented in **Figure AB.12** shows that the majority of residents with disabilities are not limited in their day-to-day activities (82.9%). This is in line with statistics for Babergh (82.6%) and England (82.4%), though slightly below averages for the region (83.3%).

**Figure AB.12: Disability**



Research into hidden needs in Suffolk highlighted the additional challenges facing rural communities in the County, such as higher domestic fuel costs, extra transport costs, and accessibility to education services and employment opportunities. Key issues affecting the health and wellbeing of rural communities include<sup>87</sup>:

- low paid work;
- fuel poverty;
- high housing costs;
- unemployment among young people;

<sup>87</sup> Healthy Suffolk (2019) State of Suffolk Report 2019 [online] available at: <https://www.healthysuffolk.org.uk/jsna/state-of-suffolk-report/sos19-where-we-live>

- social isolation, especially among older people;
- difficulty accessing healthcare services such as GPs and dentists;
- lack of suitable public transport options; and
- poor broadband and mobile phone network availability.

The State of Suffolk Report (2019)<sup>88</sup> outlines key issues from the Joint Strategic Needs Assessment for Suffolk. In 2017, Babergh, was ranked in the lowest 20% of local authorities for social mobility, which indicates that people from disadvantaged backgrounds in these areas are less likely than people from other areas to overcome disadvantage. Generally, smoking prevalence is lower in Babergh as an affluent district.

Additionally, some of the following trends prevalent within the County are identified in the JSNA:

- Currently, about 1 in 5 people living in Suffolk are aged 65 or over. Over the next 20 years, this is forecast to change, with 1 in 3 Suffolk residents being aged 65 or over, compared to 1 in 4 for England.
- Young people aged 16-17 who are not in education, employment or training are sometimes referred to as being NEET. Suffolk is within the worst performing 20% of local authorities in England in this regard.
- In Suffolk, the employment rate is higher than the national average. In the year to December 2018, 365,200 people in Suffolk were in employment, meaning that nearly 4 in 5 adults of working age were in work (78.5%). However, with an older age profile than most areas of the UK, Suffolk has a lower proportion of people of working age compared to other parts of the country.
- In 2016/17, it was estimated that 1 in 5 working age adults in Suffolk were living with a disability (around 80,000 people) and nearly 1 in 2 state pension aged adults were living with a disability (around 87,000 individuals).
- Severe Mental Illness (SMI) describes conditions such as schizophrenia, bipolar disorder and other psychoses (conditions which involve losing touch with reality or experiencing delusions). In 2017/18, nearly 6,600 people registered with a GP in Suffolk had a diagnosis of SMI.
- In 2016/17, more than 6 in 10 adults were overweight or obese in Suffolk.
- Suffolk residents typically live longer than the England average and females generally live longer than males.
- Of around 4,500 new cancer diagnoses in Suffolk in 2014, nearly 2,000 were attributed to major modifiable risk factors: around 900 were linked to smoking, 250 to unhealthy weight and 200 to a lack of fruit and vegetables.

### Healthcare provision

With regards to healthcare provision, Constable Country Rural Medical Practice is situated on the south boundary of the Plan area. The closest hospital is in Ipswich (St Clements Hospital), situated approximately 8.6km from the main settlement, as the crow flies.

### Open spaces

11.8 There are a number of open spaces in the Parish, including:

- Newcombe Wood and Great Martins Wood Village Playing Field
- School Playing Field
- St Mary's Church grounds
- Capel Road Club

<sup>88</sup> Mid Suffolk Council (2019) JSNA Summary [online] available from: [https://www.healthysuffolk.org.uk/uploads/SF1160\\_-\\_JSNA\\_State\\_of\\_Suffolk\\_Report\\_2019\\_Ex\\_Summary\\_LR.pdf](https://www.healthysuffolk.org.uk/uploads/SF1160_-_JSNA_State_of_Suffolk_Report_2019_Ex_Summary_LR.pdf)

## Future baseline

The lack of direct healthcare services within the Plan area coupled with the ageing population of Bentley (see **Chapter 8**) has the potential to lead to the decline in access to core services for residents. It is vital that the Neighbourhood Plan seeks to support the retention and improvement of important facilities within the Plan area, such as open spaces and health facilities, and access to Public Rights of Way (PRoW) in order to support healthy lifestyles in future years. The importance of local accessibility has been highlighted during the course of the ongoing pandemic.

With ongoing advances in technology, healthcare and lifestyles, people are tending to live longer than before. Suffolk has fewer working age people relative to older people than the national average, which may result in increased demand for health and care services. Given the ageing population of Suffolk and the financial challenges facing the NHS and social care, it is likely that more housing aimed at older people will be required in the future.

The mental and physical health of residents in the Plan area have the potential to worsen over time, in line with trends identified in the Suffolk JSNA. Recognising that people's health is determined primarily by a range of social, economic and environmental factors, social prescribing seeks to address people's needs in a holistic way.

## Key issues and opportunities

- Planning should seek to improve activity within the Plan area through the maintenance and provision of local green spaces, active travel routes, recreational opportunities and countryside access.
- Development should support high levels of local accessibility and seek to ensure appropriate access to key health services within and surrounding the Plan area.

## Transportation

### Context review

#### National

Key messages from the National Planning Policy Framework<sup>89</sup> (NPPF) include:

- Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
  - The potential impacts of development on transport networks can be addressed;
  - Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised;
  - Opportunities to promote walking, cycling and public transport use are identified and pursued;
  - The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account; and
  - Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.
- Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

<sup>89</sup> MHCLG (2019) National Planning Policy Framework [online] available at [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

National Planning Practice Guidance (NPPG)<sup>90</sup> identifies that it is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan.

The Transport Investment Strategy - Moving Britain Ahead (2017)<sup>91</sup> sets out the Department for Transport's approach for future investment decisions and priorities. At the local level, the strategy relies on devolved decision-making where local communities have the power and will be backed by funding. Investment aims to achieve a transport network that is reliable, well-managed, safe, and works for everyone. The transport system should also provide smooth, fast and comfortable journeys, and have the right connections in the right places.

The Cycling and Walking Investment Strategy (2016)<sup>92</sup> sets out the objectives that the DfT are working towards to meet the following walking and cycling ambition for England:

*"We want to make cycling and walking the natural choice for shorter journeys, or as part of a longer journey"*

The objectives and target set to measure progress towards the 2040 ambition are to:

- Double cycling, where cycling activity is measured as the estimated total number of bicycle stages made each year, from 0.8 billion stages in 2013 to 1.6 billion stages in 2025;
- Reverse the decline in walking activity;
- Reduce the rate of cyclists killed or seriously injured on England's roads, measured as the number of fatalities and serious injuries per billion miles cycled, each year; and
- Increase the percentage of children aged 5 to 10 that usually walk to school.

Department for Transport (2020) Decarbonising Transport: Setting the Challenge (2020)<sup>93</sup> sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050.

In February 2020, the government announced a new £5 billion 5-year funding package to overhaul bus and cycle links for every region outside London.<sup>94</sup> This builds on the Government's determination to make buses work better for their passengers. The details of these programmes will be announced in the upcoming National Bus Strategy, to be published later in 2020, and follows the allocation of £170 million to support more electric buses, increase rural mobility and trial new 'Superbus' services.

- Cycle routes will also see a major boost across the country with over 250 miles of new, high-quality separated cycle routes and safe junctions in towns and cities to be constructed across England, as part of the multibillion pound package announced

## Local

Each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008. The Suffolk Local Transport Plan 2011-2031 is published by Suffolk County Council and sets out proposed transport solutions for the plan area up to 2031, with a focus on enabling sustainable economic growth.

<sup>90</sup> Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

<sup>91</sup> Department for Transport (2017) Transport Investment Strategy - Moving Britain Ahead [online] available at: <https://www.gov.uk/government/publications/transport-investment-strategy>

<sup>92</sup> Department for Transport (2016) Cycling and Walking Investment Strategy [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/512895/cycling-and-walking-investment-strategy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/512895/cycling-and-walking-investment-strategy.pdf)

<sup>93</sup> Department for Transport (2020) Decarbonising Transport: Setting the Challenge [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/876251/decarbonising-transport-setting-the-challenge.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/876251/decarbonising-transport-setting-the-challenge.pdf)

<sup>94</sup> Department for Transport (2020) Major boost for bus services as PM outlines new vision for local transport [online] available at: <https://www.gov.uk/government/news/major-boost-for-bus-services-as-pm-outlines-new-vision-for-local-transport>

A number of policies within the Babergh Local Plan Core Strategy indirectly relate to the health and wellbeing theme, including:

- Policy CS7: Strategic Site Allocation - Babergh Ipswich Fringe
- Policy CS15: Implementing Sustainable Development in Babergh

Further, the emerging Joint Local Plan provides policies SP08, LP32, and LP33 which directly relate to this theme

## Baseline review

### Current baseline

#### Local transport infrastructure

The main road running through the Bentley settlement is Capel Road at the west end of the village, and Station Road at the east; the change happening at the War Memorial and the junction with Church Road. The rest of the Plan area is only accessible via narrow country lanes, some of which are poorly signposted.

There are no train stations within the Plan area. The Parish is relatively equal distance from Manningtree Ipswich train stations (approximately 7km from the Bentley settlement). Connectivity from Ipswich train station is notably good, with services to Cambridge, Peterborough, London and Norwich. However there are slightly more services from Manningtree, notably Harwich to London as well as Norwich to London

The bus service offer is limited within the parish. There is a daily service which runs from Ipswich to East Bergholt. There is also a community bus service which occasional offers pre-booked group organised transport from Capel to Bentley.

#### Strategic road network

Bentley is situated between two large towns: Colchester and Ipswich, which are likely to be commuting hubs for current and future residents. The A12 is the main vein connecting the Parish to these two areas. The A137 finishes at Colchester, but the A12 continues southwards, linking the Plan area to London and further to the south east coast.

#### Footpaths and cycle networks

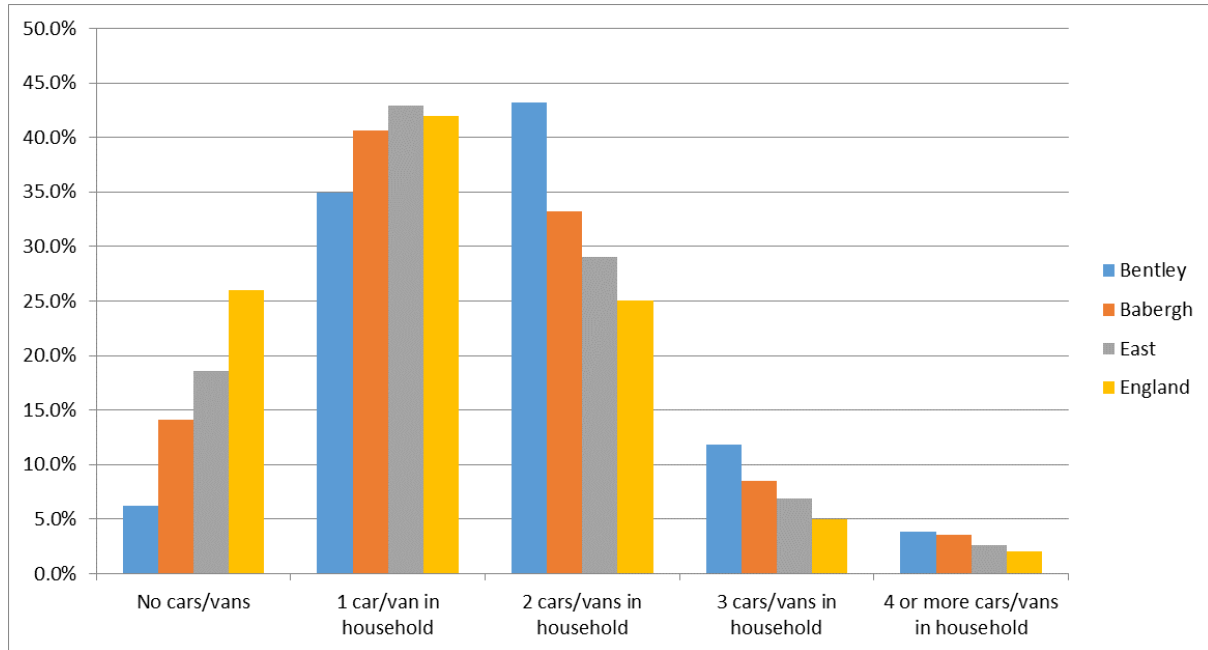
There are a number of footpaths and bridleways which connect rural parts of the Plan area to the main settlement.

There are no cycle networks within the Plan area. However, National Cycle Route 1 is situated just beyond the northern boundary.

#### Car ownership

Car ownership in the Plan area (shown in **Figure AB.13** overleaf) is comparatively higher than district-level, regional and national figures. A low proportion of residents own no cars/vans (6.2%). However, 43.2% of residents own at least 2 or more cars/vans in Bentley. In comparison, only 33.3% of residents in Babergh own at least 2 cars/vans, whilst 29.1% of those in the East region and 25.0% of those nationally own 2 vehicles.

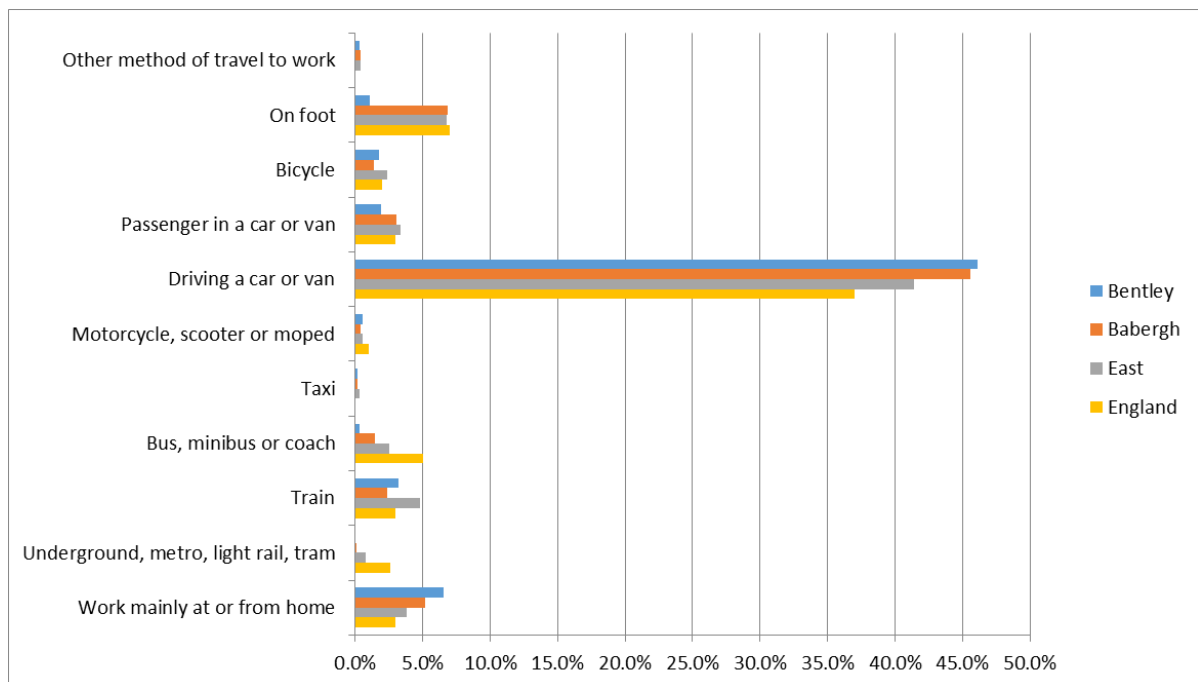
**Figure AB.13: Car ownership**



**Travel to work**

As shown in **Figure AB.14**, a large number of residents in the Plan area travel to work via car or van (46.1%), noticeably greater than national figures (37.0%). Additionally, a comparatively high proportion of residents work mainly at or from home (6.5%).

**Figure AB.14: Method of travel to work**



**Future baseline**

In the absence of strategic transport interventions, growth in the Plan area is likely to continue trends which favour the private vehicle as the primary mode of transport. New development therefore has the potential to increase traffic and lead to additional localised congestion issues which in turn may reduce road safety. A key concern in this respect is the dual carriage way and the ‘rat run’ impacts. Further to this, it is considered that public transport use is likely to remain low compared with private car use given the lack of accessible public transport options.

The Neighbourhood Plan can support small-scale infrastructure improvements and active travel opportunities that seeks to maximise opportunities for pedestrian and cyclist movements. Additionally, given trends towards working from home in Bentley, particularly when considering the ongoing COVID-19 pandemic, it is important for planning to ensure sufficient infrastructure to enable suitable internet connectivity.

## Key issues and opportunities

In the absence of strategic transport interventions, growth in the Plan area is likely to continue prevalent trends in which residents' favour private vehicles as the transport mode of choice/ necessity. It will therefore be important to locate any additional growth in areas which maximise pedestrian and cycle route connections within the settlement and beyond and support higher levels of self-containment.

Higher than average percentages of residents in the Plan area work from home when compared to the district, region and nation and this trend is forecast to become more prevalent when considering the ongoing pandemic. Opportunities to capitalise on this positive trend should be maximised.

Public transport is variable. Bus services are few and infrequent, and there are no train stations within the Plan area. Future development could seek to ensure appropriate connections to existing infrastructure and improve access to the extensive PROW network within the Plan area to encourage more sustainable modes of transportation.



